

10 June 2021

Mr Jason Burgess
Planning Officer
Ipswich Borough Council
West Grafton House
15-17 Russell Road
Ipswich, Suffolk, IP1 2DE

Dear Mr Burgess,

Application reference: DC/21/00566/FUL Erection of 2-storey building comprising a 2-Form Entry Primary School (Use Class F1(a)) and Nursery (Use Class F1(a)), with roof-top Multi-Use Games Area and enclosures, external playground, hard and soft landscaping, cycle and scooter parking, access arrangements, and associated works, including substation (following demolition of existing buildings and structures).

48 - 68 Carr Street, Ipswich, Suffolk, IP4 1EW

I write on behalf of the Suffolk Preservation Society (SPS) regarding the above application for the erection of a primary school and nursery in Carr Street, Ipswich which will involve the total demolition of the locally listed buildings on the site. SPS has previously responded to the developer consultation and again at the pre-app stage of the application where we welcomed the re-use of this currently redundant site in an area of the town which will benefit from investment. We also raised no objection to the change of use of the site from retail to educational uses. However, we have a number of concerns which have not been addressed in the submitted application.

Demolition of 48-68 Carr Street

SPS considers that the total demolition of the locally listed building on the site is highly regrettable and is contrary to policy. Whilst the need for a new primary school in a town centre location is not questioned, evidence that full consideration has been given to alternative sites, which would not require the loss of part of Ipswich's valued local heritage, should be provided.

The streetscape at this end of Carr Street retains a high degree of historic interest which is demonstrated by the fact that many of the buildings facing the street were included on the Ipswich local list in 2013. Moreover, the recently amended 2020 list includes an enhanced amount of detail on the importance of 48-68 Carr Street. As well as their considerable townscape interest, the early 1900s buildings are locally significant as they originally formed the Co-op department store and incorporate a high level of detailing at first and second storey level including decorative cornices,

parapets and significant inscriptions: 'Ipswich Industrial Cooperative Society Limited' and '1909 Each for All and All for Each' (associated with the co-operative movement).

It is therefore highly regrettable that this proposal requires the total loss of these important buildings. Their demolition clearly runs contrary to Ipswich BC's policy within IP048 of façade retention and Ipswich local plan policy DM9 which is clear that there is a presumption in favour of retaining and repairing locally listed buildings. This approach to non-designated heritage assets is confirmed in the allocation of the site (IP048) for a mixed residential/ retail redevelopment which highlights that the Carr Street facades are locally listed and that historic buildings should be respected and enhanced as a development principle of this site.

The proposals

The loss of these non-designated heritage assets on the site may only be justified by an exemplary scheme of such distinction that it outweighs their loss. Nevertheless, we consider that the proposals fail to demonstrate a level of design which successfully responds to the context of its location on Carr Street. Whilst we support a modern contemporary architectural to design rather than a pastiche approach, creating a strong sense of place, this must respect local distinctiveness and contribute positively to the streetscape.

The proposals however show little regard to the context of historic buildings on Carr Street. The Design and Access statement highlights the inclusion of a burgundy and cream colour palette, to resemble that found in the buildings to be demolished, as a response to the context of the site. If, however the scheme is to deliver meaningful improvements to the character and appearance of this part of Ipswich, we would expect reference to the context of remaining buildings adjacent and opposite the historic facades on Carr Street. This should for example include a step up in building height to 38 Carr Street and 1st floor fenestration which responds to the scale, design and rhythm of the windows on nearby buildings.

Moreover, whilst we support the proposed retention of the historic co-op signage on the replacement buildings, we are disappointed that arguably the most significant example on the Carr Street/ Cox Land corner does not appear to be included in the scheme as currently presented and we would urge that an undertaking is given to retain this feature or provide full justification for its loss. Similarly, SPS does not agree with the proposals outlined for the 1960's mural in Cox Lane and consider that arrangements for its retention or relocation intact must be agreed as part of this application.

Conclusion

SPS supports the long-awaited redevelopment of this site but is disappointed that the proposals will require the total demolition of local heritage assets. Although currently disused and in need of restoration, 48-68 Carr Street makes a positive contribution to the historic character of this part of Ipswich.

SPS does however, note that the design process which was undertaken by the applicant, as detailed in the Design and Access statement, gave consideration to schemes which would involve the conversion of the existing buildings or the retention of the Carr Street facades. Whilst this

concluded that these options were not practical or financially viable for the delivery of the required educational facilities on this site, we urge that, if IBC officers are to support the total demolition of this heritage asset, the authority's decision must be based on evidence as to the viability of more preferable options including alternative sites

In accordance with local plan policy DM9, the local authority must only permit the loss of locally listing buildings if it can be demonstrated that the replacement building is of an equal or higher standard of design. The National Design Guide also confirms the importance of good design responding effectively to historic character as part of understanding and responding to context and identity. With this in mind, and for the reasons set out above, SPS considers that further improvements must be sought

We hope that the above is helpful in the progression of this application.

Yours sincerely

A handwritten signature in black ink, appearing to read 'B. Philbidge', with a small flourish at the end.

Bethany Philbidge
BSc(Hons) MSc MRTPI
Planning Officer

cc Ipswich Society
Ipswich Conservation and Design Panel
Ward Councillors
Ipswich BC Heritage team