

14 March 2022

Ms Amey Yuill
Planning Officer,
West Suffolk Council,
West Suffolk House,
Western Way,
Bury St Edmunds, IP33 3YU

Dear Ms Yuill,

DC/22/0105/FUL | Planning application - a. one dwelling (following demolition of the existing Dower House) b. workshop with covered parking and c. orangery, Breckey Ley Old Town Lane Nowton IP29 5LT

I am writing on behalf of the SPS to object to the application for the demolition of the Dower House at Breckey Ley. The Heritage Statement, submitted by Asset Heritage Consulting, proposes that the three storey Gothic house was built by H F Bacon as the Dower House to Nowton Park in the 1880s for J H P Oakes widowed sister. Nowton Park was the estate of John Henry Oakes, who established the important local banking family and the report sets out the historical, architectural and social associations of the unlisted country house and the Dower House. The heritage assessment also confirms that examples of H F Bacon's work have been included on the statutory list (United Reform Church, Whiting St and Gurneys Bank (subsequently Barclays, Abbeygate St, both in nearby Bury St Edmunds and both listed grade II). The report also confirms that the house forms part of a group, including The Stables and The Lodge, all located within the Breckey Ley Parkland, which is entered on the Suffolk Historic Environment Record.

Notwithstanding the fact that West Suffolk Council has not compiled a Local List, the Council have confirmed in their early pre-application discussion with the applicant that in the opinion of the local planning authority the Dower House is a Non-Designated Heritage Asset (NDHA) (para. 3.4.1 Design and Access Statement). In addition, Historic England's recent guidance on Local Listing, Note 7 (January 2021) provides clear criteria for the effective assessment of NDHAs by local planning authorities, as well as all other stakeholders. It states that architectural, historic interest and group value are all important considerations in the assessment of whether a building meets the threshold of a NDHA. The applicant's submission successfully evidences that this building meets these criteria.

We note the Conservation Officer's subsequent comments that *the building is of low significance, being of an overall unremarkable design, and in poor condition* but consider that the building is a skilled and well-detailed piece of design and in a good state of preservation. Whilst appearing tired, it is not in such a state that its condition should be a material consideration in supporting the case for total demolition. Furthermore, to demolish a building as justification for developing a more sustainable building is contrary to sound conservation philosophy and runs counter to best

practice. Most built environment professionals would accept that retention and upgrading of a traditional building is far more sustainable approach in an age of Net Zero.

The proper test for assessing the application for demolition of a NDHA can be found in the NPPF at para 203 which requires a balanced judgement when weighing applications that directly affect non-designated heritage assets, having regard to the scale of any harm or loss and the significance of the asset. The SPS accept that the building may not meet the threshold for listing, however, it demonstrates both architectural and historic merit and therefore should be considered an NDHA which should weigh heavily in favour of its retention.

In the option of the SPS, the proposals will result in substantial harm to the heritage asset as all significance will be sept away by the proposed demolition. Furthermore, associative significance with the stables and lodge will also be lost. The NPPF tells us as that heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance (para.189) and when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (para.199). We therefore call for the application for demolition to be rejected in favour of refurbishment and adaptation.

It has been demonstrated by the applicant that the Dower House has considerable local architectural, social and historical significance. The Conservation Officer has also originally confirmed that it qualifies as an NDHA, and the reasons for changing this position lack a robust and defensible argument. The comments made by the Conservation Officer are brief and do not assess the building against the best practice criteria set out in Historic England Guidance. SPS considers that the loss of the asset fails to meet local policy (DM16) and national policy objectives (NPPF 189 and 199). In summary, the substantial harm should be weighed heavily against the limited benefits of providing a single-family dwelling.

We trust that you find these comments helpful in the assessment of this case.

Yours sincerely,



Fiona Cairns IHBC MRTPI
Director

Ward Councillor
Heritage team
Victorian Society