

1 March 2023

Ms Eleanor Attwood
Planning Officer, East Suffolk Council,
East Suffolk House, Riduna Park,
Station Road, Melton,
Woodbridge, IP12 1RT

Dear Ms Attwood

Re: DC/22/4945/FUL Demolition and reconstruction of building to form 2no. residential dwellings. 115 College Road Framlingham Woodbridge Suffolk IP13 9EU

Background

I write on behalf of the Suffolk Preservation Society (SPS) regarding the proposed demolition of 115 College Road, known as The White Cottage, and replacement with a pair of semidetached dwellings. The property is prominently located at the entrance to the conservation area when approaching from the north. It is a simple late Georgian cottage dating from c.1800 and is an increasingly rare regional survival of a timber framed, weatherboarded vernacular building.

White Cottage is unoccupied and has been without a beneficial use for a long period of time. In recent years SPS has raised its concerns with the College and the Council and encouraged a viable, conservative solution to be sought. We therefore supported the 2019 extant consent for the sensitive scheme of repair and re-use (ref: 19/3669/FUL).

Disappointingly the consented work has not been carried out and the building condition has been allowed to deteriorate further. Since the consent was granted roof tiles have slipped and the resultant water ingress will accelerate the deteriorating condition of the building. Accordingly, in January 2022 we urged the local authority to take necessary action within its powers under S215 of the Town and Country Planning Act to require the owner to deal with the poor state of the building. We considered that this course of action would be in accordance with the authority's own Local Planning Enforcement Plan (March 2019) which when considering S215 Notices states that: *It is likely we will use a Section 215 Notice in connection with a prominent and derelict site, particularly if it has started to attract fly tipping, or an important town centre street frontage that has fallen into disrepair, particularly if it falls within a Conservation Area.* The response to our request for action was that the council preferred to continue negotiations with the owners of the property which has, presumably, led to the current application for the demolition and replacement of White Cottage.

It is our view that a programme of conservative repair, seeking to maximise the retention of historic fabric, and to bring the building back into a viable long-term use should be the starting point of any scheme. We are therefore extremely disappointed that total demolition is now proposed.

Significance of The White Cottage

The relevant guidance for determining an application for demolition of an unlisted heritage asset can be found at para. 203 of the NPPF. It states that the effect on the *significance* (my emphasis) of a non-designated heritage asset should be taken into account in determining an application and makes clear that a balanced judgment will be required, having regard to the scale of any harm or loss and the significance of the asset. In this case the loss of significance would be total.

The Framlingham Conservation Area appraisal (2013) describes The White Cottage in the following terms: *“The simple form and humble material palette is a rare and refreshing example in the character area of a vernacular building sitting quietly in its environment. The weather boarded walls and black glazed pan tile roof are not only unusual details in this character area, but the building is the only example of a completely weather boarded dwelling in the entire conservation area. For these reasons therefore, this building makes a very important contribution to the character of the conservation area.”* The cottage has a prominent roadside location and has an architectural, social and historic value which contributes to the significance of the conservation area and the wider College with its broad collection of historic buildings. It is accepted by all parties that the cottage is a non-designated heritage asset and the very fact that the conservation area character appraisal has specifically identified the cottage as making a positive contribution to the locality’s character and appearance should justify its retention and refurbishment.

The Applicant’s own Heritage Assessment, accompanying this application, states that *The White Cottage is considered to be a rare example in Suffolk of a Georgian timber framed and weather-boarded domestic building, a high percentage of which have been at least partially rebuilt in masonry, or have had their weather-boarding replaced by render. As a result of the above, The White Cottage is considered to be of strong local architectural and historical interest.*

The White Cottage therefore has both architectural and historic townscape significance which the local planning authority should weigh heavily in the balance when assessing the future of this building.

Condition of The White Cottage

We note that that the application for demolition is supported by a structural engineer’s report prepared by JP Chick and Partners Ltd in April 2022, which states at 9.1 that *it is unlikely that much of the structure will be suitable for retention.* We also note that the Design and Access Statement provides comparison figures for the cost of repairing vs demolition and new build.

The conclusion that it is unviable to repair is predictable. We are unaware of any repairs or ongoing maintenance since we first raised our concerns with the College in 2010 and it is therefore unsurprising that the condition of the fabric has been compromised and the building is showing evidence of accelerating disrepair.

We consider that the absence of any efforts to protect the structure from further degradation constitutes neglect and planning guidance within the NPPF at para 196 is clear that *Where there is evidence of deliberate neglect of, or damage to, a heritage asset, the deteriorated state of the heritage asset should not be taken into account in any decision.*

Proposed Redevelopment

We note that, unlike the previous 2016 application for demolition and replacement of White Cottage, the current proposals seek to retain something of the essential character of the cottage by retaining the scale and form of the original. However, it is our view that the building regulation requirements of a new residential building and the use of predominately new materials will result in a pair of cottages which lack the essential vernacular character of White Cottage and will provide, at best, a neutral contribution to the character of the conservation area.

It is common ground that the building currently makes a positive contribution to the conservation area and therefore its total loss proposed under the current proposals will result in harm. This is contrary to policy SCLP11.5 (Conservation Areas) of the Suffolk Coastal Local Plan which requires development to preserve or enhance the character or appearance of the conservation area. We would remind the lpa that with regard to designated conservation areas the statutory duties under S.72 of the Planning (LBCA) Act 1990 require the decision maker to pay *special attention to the desirability of preserving or enhancing the character or appearance of the area.*

Conclusion

We welcome the College's desire to find a solution to this longstanding problem but continue to urge for a conservative approach. Para. 203 of the NPPF requires a balanced judgement to be made having regard to the scale of any harm or loss and the significance of an undesignated heritage asset.

It is our view that the loss of the heritage asset should be the last resort and proposals should aim to retain the significance of the heritage asset rather than recreate something similar but modern. We note the conclusion that the retention of the building would not be economically viable and therefore urge that the lpa consider whether enabling development elsewhere on the College's estate may be appropriate to meet any verified conservation deficit. Alternatively, options could be explored to transfer the ownership of this important local vernacular building to a suitable conservation body.

We trust that you will give these observations full consideration in the assessment of this planning application.

Yours Sincerely,

Fiona Cairns
Director
BA(hons), Dip TP Dip BldgCons(RICS) MRTPI IHBC

Ccs - Framlingham Ward Councillor
Chairman - Framlingham Historical Society
Chairman – Framlingham Town Council
Robert Scrimgeour, Principle Conservation Officer

