

17 April 2023

Mr Grant Heal
East Suffolk Council,
East Suffolk House
Riduna Park,
Station Road, Melton,
Woodbridge
IP12 1RT

Dear Mr Heal

DC/23/0553/FUL Proposal to carefully demolish existing timber clad bungalow and erect a new 3 bedroom property with 2No. parking spaces

38 Berners Road Felixstowe Suffolk IP11 7LF

I write on behalf of the Suffolk Preservation Society (SPS) regarding the proposed demolition of 38 Berners Road and the redevelopment of the site to form a substantial five bed dwelling with parking. The SPS is concerned by the inadequate level of heritage assessment of the intrinsic architectural and historic interest of the weatherboarded bungalow. The submission is insufficient to make a reliable judgment about the contribution the building makes to the character and appearance of the Felixstowe Conservation Area. Furthermore, we have concerns about the design quality of the proposed replacement in terms of the scale, design and layout, which have the potential to harm the special interest of the conservation area, a designated heritage asset.

Non Designated Heritage Asset

We note that the Consultation Draft of the Felixstowe Conservation Area Appraisal identifies this building as a Positive Non Listed Building, and accordingly should be treated as a Non Designated Heritage Asset (NDHA). Notwithstanding the map regression that forms part of the Design and Access Statement, the application is not supported by a heritage statement or adequate analysis of the fabric of the building, other than to highlight its neglected condition since 2019 when the photograph was taken for the appraisal document. It is clear from that document and from Google Street View that the weatherboarded cottage has a 19th century sash (without horns) on the front elevation which is presumably salvaged.

The D&A statement also indicates the exceptionally high boundary wall on the western boundary and draws attention to the historic OS maps which show, as late as the 1940s, a much larger structure on the site. Therefore, with the obvious conflict between the conservation area appraisal suggesting that the cottage is a positive Non-Designated Heritage Asset, and the applicant's

submission suggesting otherwise, the local planning authority should call for a more comprehensive assessment of the historical and architectural significance of the building. This should be carried out by an independent conservation accredited expert. At which point, the advice of your inhouse conservation advisors should be sought to determine whether the contribution this building makes to the conservation area is sufficient to resist the application for demolition.

Proposed Design

With regard to the design of the proposed replacement building, we share the concerns expressed by the Felixstowe Society, namely that the building is both too tall for the relatively narrow plot, and it should relate better to the adjacent small bungalows. We share their concerns about the quality of the elevational treatment, failing to draw upon the rich architectural vocabulary of the adjacent Edwardian buildings which display a rich palette of bays, balconies, decorative brickwork, window dressings, chimneys and sash windows. We also feel particularly strongly that the proposed forecourt parking is harmful to the character and appearance of the conservation area, which, although some of the neighbouring properties have sadly lost their boundary walls in the 20th century, has at least avoided significant levels of off-road parking in front gardens. It is important therefore that new development follows this basic townscape layout.

Summary

The SPS considers that the application should not be progressed until the significance of the existing building is fully understood and a considered judgement made about its intrinsic value as a heritage asset can be made. Thereafter, if the council are minded to support the total loss of the NDHA, greater effort should be made to design a building that positively enhances the character and appearance of Berner Street. The SPS does not consider that the submitted proposal is of a sufficiently high standard to meet the statutory duty to preserve or enhance the character and appearance of the conservation area, nor the national land local policies which require this duty to be met.

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

Felixstowe Town Council
Felixstowe Society
Felixstowe Ward Councillor