



Historic England

EAST OF ENGLAND OFFICE

Mr Philip Isbell
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Direct Dial: 01223 582751

Our ref: P00524468

2 June 2017

Dear Mr Isbell

**T&CP (Development Management Procedure) (England) Order 2015 & Planning (Listed Buildings & Conservation Areas) Regulations 1990
LODGE FARM, KERSEY ROAD, LINDSEY, IPSWICH, IP7 6QA
Application No. B/16/00955**

Thank you for your email of 17th May 2017 regarding the proposed amendments to the above planning application. On the basis of this information, we offer the following advice to assist your authority in determining the application.

Summary

The proposed development comprises the construction of a three bedroom detached 'eco-dwelling'. The majority of the structure would be single storey and terraced into the application site, however it would incorporate a corten steel clad 'landmark' tower structure in the centre of the building. The application site lies due north of three scheduled monuments, one of which (St James' Chapel) is also grade I listed. Historic England provided previous advice on this scheme dated the 9th September 2016, 31st October 2016 and 18th January 2017 (Our ref: P00524468). The advice below should be read in conjunction with our previous comments.

Historic England Advice

The application site lies to the north of three scheduled monuments - *St James' Chapel* (List Entry No. 1006066), *Manorial bank adjacent to Lindsey Chapel* (List Entry No. 1006027) and *Lindsey Castle* (List Entry No. 1006042). St James' Chapel is also grade I listed and there are several nearby grade II listed buildings.

Our advice on the last set of amendments (January 2017) re-emphasised our concerns over the proposed design of the eco-dwelling; specifically the tapering angular shape, sharp roofline and enhanced verticality of the landmark tower. We were concerned with the style of the cladding and the use of glazing, and how the tower would impose a notably modern structure, of unfamiliar form and design, on the historic landscape. It was our view that the development would distract and intrude



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upon the way the adjacent designated heritage assets (particularly St James' Chapel) are experienced, resulting in harm to their significance. The January 2017 amendments included a revised Landscape and Visual Assessment and Heritage Statement, and new landscaping proposals to better screen and reduce the visibility between the development and the scheduled monuments. Whilst we welcomed the new screening, we did note that it would not completely negate the visual impact. We also disagreed with some of the conclusions of the Heritage Statement, specifically that the proposed development would result in only a '*negligible harmful impact*'.

Following a meeting between Babergh District Council, Historic England, Essex Place Services and the applicant's architect on the 18th April 2017, amendments have been made to the proposed design. These comprise reducing the height of the tower by 1.26m and reducing some elements of its plan form, re-orientating the cladding on the tower, removing the south study window, re-colouring the window frames to match the corten steel, and adjusting the southern and western elevations to make the tower more vertical and less tapered.

We broadly welcome these changes and the applicant's willingness to address some of our concerns. The decrease in size and height and changes to fenestration would reduce the visibility of the tower, whilst re-orientating the cladding and having a less tapering effect also acts to reduce the 'verticality' which we had highlighted in our previous advice. These changes, coupled with the enhanced landscaping proposals, would decrease the visual intrusion of the development in shared views with St James Chapel, and in views looking out from the other scheduled monuments. To this end the impact upon the setting of the scheduled monuments would be reduced.

However, we do still have a number of reservations with the development. In the first instance, we would note that although the tapering effect has been reduced on some parts of the tower, the internal angle of the slope of the southeast corner has actually been decreased - which gives the southern elevation a more dramatic and prominent appearance than the previous design. We also note that there have been no updates or addendums to the heritage statement, which was the subject of discussions during the meeting on 18th April 2017. Secondly, in terms of the overall impact of the development, we continue to have concerns with the impact from the proposals upon the historic character of the asset's settings and the resulting harm to significance. We would reiterate our previous comments that the single storey / terraced element of the proposals would have a low visual impact and, although we would consider it to result in some harm to the significance of the designated heritage, we accept that the level of harm would be low. However we remain of the view that the inclusion of the tower would place a notably modern structure, of unfamiliar form and design within the setting of the heritage assets, with a design that is unreflective of the traditional style, form or materials of the surrounding built development (historic or otherwise). To this end, and despite the amendments, the development would still change the character of the surroundings and would intrude into a landscape which, although not identical,



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reflects the heritage assets' contemporary surroundings and provides important historic context. There would remain a degree of visual intrusion, particularly with seasonal variations and whilst the screening establishes itself. It should also be highlighted that there would be an additional change in the way the heritage assets are experienced from a more impermeable vegetation screen, which further separates them from the landscape to the north.

NPPF paragraph 132 requires great weight to be given to the conservation of a heritage asset. The more important the asset, the greater the weight should be and scheduled monuments and grade I listed buildings are considered to be heritage assets of the highest significance. It is also relevant to note section 66(1) of the Planning (Listed Buildings and Conservation Areas), which provides special regard to the desirability of preserving the setting of listed buildings. The NPPF requires *any* harm to have clear and convincing justification and for that harm to be weighed against the public benefits of a proposal. NPPF paragraph 137 seeks for proposals with the setting of heritage assets to enhance or better reveal their significance.

The proposed development would impact upon the setting of the designated heritage assets, although the level of impact has been reduced (but not removed) by the proposed changes to the scale, height and design of the tower structure. There remains an adverse impact from the design and style of the proposed development and the inclusion of the tower. It is our view that the proposed development would still result in harm to the significance of the designated heritage assets (most notably St James' Chapel), in line with NPPF 132 and 134, and would not enhance or better reveal significance of the assets, in line with NPPF 137. We continue to have reservations over the application in its current form, in particular the level of public benefits against the level of harm, and the need for the tower.

Should the Council propose to approve the application, you should be fully satisfied that there is a clear and convincing justification for the harm, and crucially that it is outweighed by the public benefits of this single residential dwelling. We would emphasise the comments from our previous advice that a key consideration in any planning decision should be whether the benefits of the development could be achieved through a scheme resulting in less harm to the significance of the heritage assets. A focus of this would be whether the development could be provided without the tower, which is the most intrusive element of the current design.

Whilst we will not be objecting to the proposed development in principle, we would support additional design changes to further reduce the level of impact and harm, building upon the amendments already incorporated. For example, addressing the southeast angle highlighted above, changes in the long vertical window on the southern elevation, or changes in the overall design to better reflect the traditional



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style, scale, form and materials of the surrounding built development. Should the tower be removed completely, we would have no further concerns with the development. Addendums to the heritage statement to reflect the amendments and our previous comments (in regards to setting) would also be of benefit. Should the application be approved, we would recommend conditions are attached to secure the relevant elements of the amended design (as appropriate) and to require all landscape planting and enhancement to be in place before the commencement of any building works, thereby allowing the vegetation to establish and provide maximum screening between the proposed development and the heritage assets.

Recommendation

Historic England has concerns regarding the application on heritage grounds. We welcome the recent amendments; however continue to have reservations as to the overall level of impact and harm. Additional changes to the design of the development could further reduce this and ensure the application better meets the requirements of paragraphs 132, 134 and 137 of the NPPF. In determining this application you should also bear in mind the statutory duty of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess, and section 38(6) of the Planning and Compulsory Purchase Act 2004 to determine planning applications in accordance with the development plan unless material considerations indicate otherwise.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If, however, you propose to determine the application in its current form please inform us of the date of the committee and send us a copy of your report at the earliest opportunity.

Please contact me if we can be of further assistance.

Yours sincerely

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