

From: Johnson, Claire
Sent: 28 Mar 2018 15:15:53 +0100
To: Fosker, Edward
Subject: 27 Old Clements lane, Haverhill

Hi Ed,

Please find Conservation response to Heritage Statement and Engineer's report re above.

Heritage Statement

Para 9 of the submitted Heritage Statement advises

'The Local Planning Authority has quoted policy on such buildings as relevant in the determination of this application. Policy DM16 of the local plan requires that plans identified as affecting buildings identified as Local Heritage Assets must have regard to the sustainability and protection of the asset and its setting. However, if there is no list, no building including 27 Clements Lane can be placed on it. Whilst the aim of the policy is quite clear, and the sentiment behind it is understood its application in this instance is considered erroneous'

The definition of a Heritage Asset can be found in National Planning Policy Framework Guidance, Annex 2 - Glossary

A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage Assets includes designated heritage assets and assets identified by the local planning authority (including local listing).

The word 'including' should not be interpreted to the exclusion of those not included on a list.

The guidance goes on to advise -

How are non-designated heritage assets identified?

Local lists incorporated into Local Plans can be a positive way for the local planning authority to identify non-designated heritage assets against consistent criteria so as to improve the predictability of the potential for sustainable development.

It goes on to state

When considering development proposals local planning authorities should establish if any potential non-designated heritage asset meets the definition in the National Planning Policy Framework at an early stage in the process. Ideally, in the case of buildings, their significance should be judged against published criteria, which may be generated as part of the process of producing a local list.

The NPPF guidance makes no distinction between a non designated heritage asset included on a local list and one which is not. The phrase 'when considering development proposals' confirms it is possible to identify non designated heritage assets as late as at an application stage. The words 'potential non designated heritage asset' further supports this interpretation.

Ideally but not exclusively, their significance should be judged against published criteria.

Finally - Historic England Advice Note 7 - Local Heritage Listing, further supports the Local Authority's approach, confirming the absence of any particular heritage asset from the local list does not necessarily mean that it has no heritage value, simply, as in this instance, that it has yet to be identified.

DM16 sets out the requirements of an application affecting a local heritage asset. It does not state the policy exclusively applies to buildings included on a local list. Whilst 27 Old Clements Lane does not appear on the Authority's Local list of Non Designated Heritage Assets the pre-ambule to policy DM16 clearly states these lists will be the subject of review, enabling the addition and removal (if applicable) of assets as and when they are identified.

The application of policy DM16 in this instance is not therefore considered to be 'erroneous' but relevant together with para 128, 135 of the NPPF.

Criteria adopted to identify 27 Old Clements Lane as a non designated heritage asset.

The pre-ambule to DM16 sets out broad criteria for the identification of local heritage assets (non designated heritage assets) advising the importance of such buildings can be due to their location, their appearance, their significance as part of a wider group or their role in the social or economic development of settlement or area in which they are located.

Whilst a more detailed criteria has not been formally adopted by the LPA to identify non designated heritage assets, Historic England Advice Note 7 Local Heritage Listing May 2016, acknowledges a range of methods can be used to identify undesignated heritage assets however the following selection criteria are commonly used by local planning authorities and were used to identify 27 Old Clements Lane as a non designated Heritage Asset.

- Age: The age of an asset may be an important criterion and the age range can be adjusted to take into account distinctive local characteristics
- Rarity: Appropriate for all assets, as judged against local characteristics
- Aesthetic value: The intrinsic design value of an asset relating to local styles, materials or

- any other distinctive local characteristics
- Group value: Groupings of assets with a clear visual, design or historic relationship
- Evidential value: The significance of a local heritage asset of any kind may be enhanced by a significant contemporary or historic written record
- Historic association: The significance of a local heritage asset of any kind may be enhanced by a significant historical association of local or national note, including links to important local figures
- Archaeological interest: This may be an appropriate reason to designate a locally significant asset on the grounds of archaeological interest if the evidence base is sufficiently compelling and if a distinct area can be identified
- Designed landscapes : Relating to the interest attached to locally important designed landscapes, parks and gardens
- Landmark status : An asset with strong communal or historical associations, or because it has especially striking aesthetic value, may be singled out as a landmark within the local scene
- Social and communal value: Relating to places perceived as a source of local identity, distinctiveness, social interaction and coherence; often residing in intangible aspects of heritage contributing to the “collective memory” of a place

Although not specified with the guidance, it would appear that where the guidance has been used to formulate established criteria, a building or structure must meet two or more of these significance-measuring criteria to be identified as a non-designated heritage asset.

The LPA’s initial assessment has been updated to include relevant information detailed in the Applicant’s Heritage Statement.

Significance of 27 Old Clements Lane

27 Old Clements Lane is a double fronted two-storey house with a modified rear outshut most likely dating from the early part of the 19th century. We are advised a semi-basement extends below both the main and rear range and its separate access may have provided access to a workshop possibly associated with some parts of the textile industry. The front elevation is largely symmetrical benefitting from a shallow pitched hipped, slate roof. The windows at ground and first floor have both changed although the bays are thought to have been an early alteration. The proportions of the original windows at both ground and first floor to the front elevation have been respected.

Access is via a short flight of steps protected by an open fronted steeply pitched gabled porch with finial, which it would appear has altered little in appearance since the late 19th century/original construction. (reference taken from photo included in Applicant's Heritage Statement). A pebble dash render encases the entire building where previously the flank walls were, at one stage, fair faced brickwork.

The original outshuts have been modified to provide first floor accommodation and the interior has been significantly altered. However, in the absence of any control over internal works, the outward appearance of the building rather than its interior is the main focus of a non designated heritage asset.

The structural engineer's report advises the construction of the main range is 225mm solid brick with later upper floors over the rear outshuts constructed of single skin brickwork.

I believe the building is not only a non designated heritage asset which appears to be highly visible but also makes a positive contribution to the character of the area, setting aside the modern development on the opposite side of the road.

In response to the selection criteria above –

- Age - The building is mid to late 19th century, possibly earlier.
- Rarity - The building represents a design that has now become uncommon or exceptional to the locality, particularly given the presence of the cellar potentially used as a workshop associated with the textile industry (please refer to Applicant's Heritage Statement). This in itself is quite unusual and of particular local interest and significance due to the presence of the Gurteen factory within the town.
- Aesthetic Value - The building has undergone a number of changes not unexpected or uncommon to a building of this age. Despite these changes, however, the building exhibits a positive architectural appearance in the streetscape and is still recognisable as the building from the picture of the late 19th century included in the Applicant's Heritage Statement.
- Group Value - The building forms a group with the immediately adjacent historic buildings which although much altered are of similar scale.
- Evidential Value None known at time of writing
- Historical Association - The Heritage Statement advises it is possible the cellar may have provided workshop space for a textile worker where elements of the trade required a damp atmosphere. It is possible therefore the construction of the building and the use of the cellar relates to the significant growth of the town associated with its expansion as a textile town during the 19th century.
- Archaeological Interest - Not applicable.
- Designated Landscapes - Not applicable
- Social and Communal Values - None known at the time of writing.

The building therefore meets 5 of the 7 applicable significance-measuring criteria, and can therefore be identified as a non-designated heritage asset.

Condition of the building

Consideration is given to the condition of the building and the works necessary to repair the building. The existence of a cementitious render is regrettably not uncommon to historic buildings but typically the repairs required as a result of its existence tend to be more onerous where applied to a timber framed building or one constructed of clay lump. Whilst a number of cracks have been identified within the render, it would appear these are largely associated at the junction between the different construction phases, which is to be expected, together with the prolonged inadequacy/failure of drainage.

The recommendations made include the reduction of ground levels, the overhaul/replacement of existing ground foul and stormwater drainage arrangements; reroofing to include the bay windows; repairs to cracked render involving potential repairs to the brickwork behind and the replacement of joinery. The works also include upgrading the single skin extensions, internal re-plastering throughout; new services; provision of adequate ventilation to ground floors together with extensive treatment works to the timbers forming the suspended ground floor, no details provided; new kitchen and bathrooms.

We are advised that these works would, in the opinion of the engineers, be neither practical nor cost effective.

Whilst it is accepted the extent of repairs is considerable they would not appear, from the details provided, to be anything out of the ordinary for a building of this age which has suffered from the lack of general maintenance. The failings identified would appear to be largely superficial rather than structural and, whilst viability is not a consideration from a conservation point of view, no breakdown of costs has been provided to demonstrate the works would not be cost effective.

I would suggest these would be relevant when assessing the application. N.B. Costs associated with new kitchen bathrooms, services, finishes, groundworks associated with regularising levels would be required when redeveloping the site or indeed typically desirable by a new owner when the property changes hands and in my experience are not considered to be overly onerous by new owners taking on the challenge, when they are aware of the work involved. The upgrading of thermal elements is similarly today common practice when buildings of this age change hands. I would therefore similarly question the relevance of such associated costs when considering viability.

Despite the early changes the building is still considered to meet the criteria of a non designated heritage asset worthy of retention. Based on the information provided the proposed demolition would prove contrary to policy DM16, in particular insofar as the proposal to demolish the building will entail an unacceptable loss. In cases where the works would cause harm to a local heritage asset clear justification for the works must be provided so that the harm can be weighed against any public benefits. I would suggest the additional information

regarding costs, to include the value of the property following completion of the works, is relevant when you assess the acceptability of the application.

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