

# Eddisons

## Design and Access & Heritage Statement



Property / Land at:

39 High Street, Haverhill, CB9 8AE

Application Proposal:

Roofing works, External joinery, Masonry repairs, Removal of fixtures, Replace windows

On Behalf Of:

The 2010 H J Pelly Settlement Trust

Our Reference:

Agent:

Thomas Makey MRICS

## 1. Introduction

This document is submitted on behalf of the 2010 H J Pelly Settlement Trust in support of an application for Listed Building Consent for replacement windows, a flat roof overlay, external joinery and masonry repairs and removal of previous tenant fixtures. This document is also to give additional detailed information to officers and consultees dealing with the application and to inform the public and others with an interest in the proposal about the development.

The proposed window changes are to improve the thermal efficiency of the building. The windows which are proposed for change are not those protected by the listed building status on the front elevation but more modern units to the side and rear. Along with improving the thermal efficiency of the building the change to the side elevation by reducing the size of the windows is suit the proposed future use of the internal space.

The flat roof area to the single storey extension at the rear of this property is in poor condition. The proposal to overlay this roof includes additional insulation to improve the thermal efficiency of this element, this is also a requirement of the Building Regulations.

Minor items of repair and decoration are also included in this scope of work.

### 1.1 The Site

The application site address is 39 High St, Haverhill CB9 8AE as indicated by the red outline on the location plan below.



Figure 1: Location of the subject property.

## 1.2 Proposed Works

The proposed works relate to repair and improvements at the subject property, which aim to provide longevity for the building and further improve its energy efficiency.

In brief, the proposed work to the subject property inc. –

- (i) Replace single glazed windows to side and rear elevations
- (ii) Flat roof repair with a new mineral felt overlay with insulation and waterproofing
- (iii) Undertake decoration to previously decorated joinery and masonry, including render

For full details of the proposed works, please refer to the application submission documents, in particular the proposed schedule of work.

## 1.3 Planning Context

### 1.3.1 Legislation and National Policy

There is national policy and guidance relating to the protection and treatment of the historic environment within the planning process. These identify the historic environment as a non-renewable, fragile, and finite resource and place priority upon its conservation. This includes the setting out of appropriate assessments to ensure damage or loss the resource is permitted only when it is justified.

The National Planning Policy Framework (NPPF), published in 2012 and last updated in December 2023, sets out the UK Governments requirements for the protection and enhancement of the historic environment, and should be read in conjunction with the accompanying Planning Policy Guidance (PPG). The national policy relevant to this assessment is detailed in the Appendix.

### 1.3.2 Local Planning Policy

Local planning authorities are responsible for implementing the requirements articulated by legislation and the NPPF as regards to the protection of the historic environment on a local level, and the formulation of policies to support this obligation. The Site is located within the jurisdiction of West Suffolk which is currently subject to policies set out within the appendix.

### 1.3.3 Relevant Planning Context

A search of the West Suffolk Council planning application website, showed there to be no previous planning applications that have been accepted or denied.

## 2 Impact Assessment

### 2.1 Scope of Assessment

This section considers the impacts of the proposed works upon the significance of known heritage assets.

The scope of assessment gives due respect to Paragraph 200 of the NPPF in efforts to undertake a sufficiently diligent and proportionate approach: "*In determining applications, local planning authorities should require an applicant to describe the significance of any*

*heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary."*

## **2.2 Direct and Indirect Impacts**

Building works are the main source of direct impacts from a proposed development. Such works can cause direct impacts upon the significance of heritage assets.

Works that sustain, maintain, preserve or enhance the significance of heritage assets are beneficial, bringing about a degree of public benefit that, commensurate with the works and significance of the asset are due a positive material consideration in the planning balance. Should a programme of works present an optimal re-use of a designated heritage asset and/or secure its ongoing use, they also weigh positively within the planning balance.

Works that erode those elements of a heritage asset that have heritage significance are detrimental and are due a negative weight in the planning balance.

In the majority of developments, both positive and negative impacts occur, and as such a balance should be struck to ensure that the overall impact is positive or neutral, or that the degree of harmful impact is outweighed by the public benefits of other elements of an application for planning permission.

## **2.3 39 High Street, Haverhill Listing Description**

The listing entry number is 1375517 and the Official list entry from Historic England entry is stated below:

Heritage Category: Listed Building  
Grade: II  
List Entry Number: 1375517  
Date first listed: 26-Jun-1952  
Statutory Address: BARCLAYS BANK, 39, HIGH STREET

The building or site itself may lie within the boundary of more than one authority.

District: West Suffolk (District Authority)

National Grid Reference: TL6728745417

Detail: HAVERHILL

TL6745 HIGH STREET 816-1/5/16 (North East side)  
26/06/52 No.39 Barclay's Bank

II

House. Early C18 in origin; refronted 1822, converted to bank C20 and drastically altered. Gault



brick facade, slate roof with brick internal gable-end stacks. EXTERIOR: 3-storey 5-window front, the central bay breaking forward. Central portico porch carried on pair of fluted Roman Doric columns rising to panelled architrave. 4-panelled door and overlight of 2 concentric circles in panelled reveals in doorcase of reeded pilasters with meander capitals. Two horned sashes either side with 2/2 glazing bars and gauged skewback arches. Five similar sashes to both floors above, those to attic storey shorter. Dentil eaves cornice. Plaque on south gable wall bears date: 1822. INTERIOR: no features earlier than 1980 survive in banking hall. Original plan compromised.

## 2.4 Impact of Proposed Works

### Windows

The windows to be replaced are all single glazed and part of the modern single storey extension to the rear of the property. The windows on the side elevation are on a public foot path and so easily visible, the other windows are only accessible from the flat roof.

Two of the side elevation windows are to be reduced in size. The new windows will all be of a similar style. The openings will be reduced using brickwork of a matching size and style to the existing which has a painted finish. The walls are to be redecorated to ensure continuity. The impact will be minimal however the public will see a change in the side façade. The changes will provide more privacy for those building users working in this area, the current windows are full height and allow a clear view inside the building. The two windows are identified with the red outline on the photograph below.



*Photo 1: Side elevation with windows highlighted that are to be reduced in size*

The new window openings will match the style of the others on this elevation with an angled blue brick cill. The impact therefore is deemed minimal. The large full height windows currently seem out of place due to their size and the proposals will bring these in line with the rest of the elevation.



*Photo 2: Existing window cill detail*

The intention to replace the remaining side elevation windows is to upgrade the thermal performance of these units as they are currently only single glazed and the timber is in poor condition. The windows will be of a matching style but with a uPVC frame. uPVC is a low maintenance and thermally efficient material for window framing and is suitable for windows of this size.

The other windows planned for replacement are those that will clash with the proposed roof height as a result of the increased level of insulation. An upstand of 150mm is required from flat roof level to any opening and three window openings need to be reduced in size to accommodate this. The windows are shown in the photographs below. These are not visible to the public and are not part of the original building as therefore we deem the visual impact to be minimal. The new windows will be double glazed and so will improve the thermal efficiency of the building further.



*Photo 3: North light windows on flat roof*



*Photo 4: Windows to rear on lower flat roof*

The photos above are of the three windows and they highlight the low level of the window cill which will clash with our proposed new roof covering.

## **Roof**

The works on the roof are being made to increase the longevity of its life, by improving thermal efficiency and water tightness. Via installing a mineral felt overlay because the existing one had deteriorated. More insulation is being installed to maximise the efficiency as there is little installed as it is the minor masonry and render repairs will improve the buildings tidiness from the exterior. Windows will be installed after the roof maintenance. They will be smaller and will be the latest PVC windows. The removal of the previous tenants' fixtures will also clean the exterior look up.

## **Decoration**

Re-decoration is planned to the building with previously decorated masonry, render and joinery all to be re-coated. The work will include suitable preparation to remove any loose material and ensure the surfaces are ready for a new coating. The preparations will include isolated repairs as may be necessary.

A breathable masonry paint is to be used on the render and masonry to ensure no moisture is trapped behind it and the building is allowed to 'breathe'.

Flexible water based joinery paint will be used for the external joinery including the doors and windows.

### **3 Summary**

This document demonstrates how the harm caused to the listed building has been weighed against the public benefits of the proposal and would help to secure its optimum viable use.

It is considered that the proposals will not cause overall harm to the significance of 39 High Street, Haverhill, or impact adversely on the setting. It is likely that if these proposals are not implemented, the structural integrity of the asset and its general condition will decline with particular consideration for the flat roof areas.

The roof and window proposals will both improve the thermal efficiency of the building by replacing/upgrading elements that are poor insulators.



## Appendix A Planning Policy

### Legislation

<p><b>Planning (Listed Buildings and Conservation Areas Act (1990))</b></p>	<p>The Planning (Listed Buildings and Conservation Areas) Act 1990 covers the registration of Listed Buildings (that is those buildings that are seen to be of special architectural or historic interest) and the designation of Conservation Area (area of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance).</p> <p>A Listed Building may not be demolished or altered or extended in any manner which would affect its character as a building of special architectural or historic interest without Listed Building Consent being granted.</p> <p>There are three grades of listed building (in descending order):</p> <p>Grade I: buildings of exceptional interest.          Grade II*: particularly important buildings of more than special interest; and          Grade II: buildings of special interest, warranting every effort to preserve them.</p> <p>When making a decision on all listed building consent applications or any decision on a planning application for development that affects a listed building or its setting, a local planning authority must have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. Preservation in this context means not harming the interest in the building, as opposed to keeping it utterly unchanged.</p> <p>The Act requires local planning authorities to pay special attention throughout the planning process to desirability of preserving or enhancing the character or appearance of a Conservation Area.</p>
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Table 1: National Legislation relevant to the proposed works

### National Policy

Title	Content
<p><b>NPPF Chapter 16, Paragraph 196</b></p>	<p>Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:</p> <ul style="list-style-type: none"> <li>a) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;</li> <li>b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;</li> </ul>

	<p>c) the desirability of new development making a positive contribution to local character and distinctiveness; and d) opportunities to draw on the contribution made by the historic environment to the character of a place</p>
<p><b>NPPF Chapter 16, Paragraph 203</b></p>	<p>In determining applications, local planning authorities should take account of:</p> <p>a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;</p> <p>b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and</p> <p>c) the desirability of new development making a positive contribution to local character and distinctiveness.</p>
<p><b>NPPF Chapter 16, Paragraph 205</b></p>	<p>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 (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.</p>
<p><b>NPPF Chapter 16, Paragraph 208</b></p>	<p>Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.</p>

Table 2. National policy relevant to the proposed development, National Planning Policy Framework (NPPF), (published 2012, updated 2023)

## Local Policy

Policy	Content
<p><b>The Historic Environment</b></p>	<p>As well as containing a number of listed buildings, Haverhill contains two conservation areas, within and close to the town centre. These are centred on Queen Street and Hamlet Road. Both have Appraisal and Management Plans which were published in 2008.</p> <p>14.2 In 2031, Haverhill will be a place where:</p> <p>Aspiration 27 The historic and natural environment is protected, maintained and enhanced.</p> <p>Aspiration 28 The new pressures on the town are managed and new development is responsive to local distinctiveness.</p> <p>THE HISTORIC AND NATURAL ENVIRONMENT IS PROTECTED, MAINTAINED AND ENHANCED</p> <p>14.3 Development represents the greatest threat to the historic and natural environment and even infill and brownfield developments can have an impact. Although the most important sites and species are protected by law, the loss of incidental habitats and trees can lead to increasing isolation. There are several local amenity groups with an interest in the historic and natural environment in Haverhill. These represent a valuable resource of local knowledge which could be better used.</p>

	<p>14.4 A Conservation Area Appraisal and Management Plan for each of the two conservation areas was adopted in 2008, identifying key characteristics and the potential threats to that character. They set out a medium to long term strategy to preserve and enhance the character and appearance of the conservation areas and in particular, to deal with the negative areas, problems and pressures identified in the appraisals.</p> <p>14.5 The railway walk provides a key wildlife and access corridor through the town. It connects with parks and natural areas, such as East Town Park, Meldham Washlands and the area off Millfields Way, which adds to its value and makes it an important focus for the natural environment in Haverhill. Better connections to housing areas would make it more accessible to residents</p> <p>14.6 In consultation, the lack of parks and accessible green space in Haverhill was raised as an issue. East Town Park is a small country park located to the south-east of the town, but the nearest large accessible open space is at Clare Country Park. The borough council owns a large quantity of the open space and woodland in and around the town, and it is much enjoyed by residents, but it is expensive to maintain.</p> <p>14.7 The actions to this aspiration are:</p> <ul style="list-style-type: none"> <li>a. Improve connections between the railway walk and nearby residential areas.</li> <li>b. Link the railway walk to the Stour Valley Walk and other footpaths.</li> <li>c. Promote the historic and natural environment for recreational and leisure opportunities.</li> <li>d. Work in partnership with local groups to implement historical and environmental projects.</li> <li>e. Identify opportunities for additional open space for Haverhill residents, including the expansion of East Town Park.</li> <li>f. Explore different options for managing the town's open space and woodland, particularly when planning new green infrastructure.</li> <li>g. Ensure that new green infrastructure linking to existing open spaces is integral to all new development.</li> <li>h. Ensure, where appropriate, that new development contributes to the delivery of projects identified in the Green Infrastructure Study.</li> <li>i. Continue to support and develop community-led initiatives, such as events and competitions, to increase understanding of the environment to protect, promote and enhance the historic and natural environment and its interpretation.</li> <li>j. Ensure that new development seeks to minimise any impacts on biodiversity, providing a net gain wherever possible.</li> <li>k. Support and encourage developers to carry out archaeological assessment at an early stage in the design process.</li> </ul>
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*Table 3: Policy relevant to the historic and natural environment taken from the West Suffolks Council Local Plan on Haverhill 2031 target.*