Clopton Hall Rattlesden, Suffolk, IP30 ORN

Heritage Statement

August 2023



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1 Introduction

1.1 This report has been prepared to support a planning and listed building consent application for proposals affecting Clopton Hall, Rattlesden, Suffolk, IP30 ORN. The report has been prepared for the Mr Moody & Dr Dormer.

Purpose

- 1.2 The purpose of the report is to assess the proposed works against national and local policies relating to the historic built environment. This report addresses built heritage matters and does not deal with archaeological matters.
- 1.3 This report should be read in conjunction with the accompanying drawings and Design and Access Statement prepared by Gregori Chiarotti Projects, submitted with the application.

The proposed development

Planning permission and listed building consent are sought for works to refurbish, repair and improve Clopton Hall for continued use as a home.

Background

- 1.5 A previous application for similar but more extensive proposals was made by Gregori Chiarotti Projects but withdrawn in January 2023. Further pre-application discussions have since been held with the local planning authority, the scheme has been amended and a new application has been prepared.
- 1.6 KMHeritage has been engaged to assist in making the new application. In drafting this Heritage Statement we have used information and analysis regarding the history and significance of the site undertaken by Gregori Chiarotti Projects.

Organisation

1.7 This introduction is followed by a description and analysis of the site and its heritage significance in Section 2. Section 3 sets out the national and local policy and guidance relating to the historic built environment that is relevant to this matter. An outline is provided in Section 4 of the proposed scheme and its effects. Section 5 assesses the proposals against that policy and guidance. Section 6 is a summary and conclusion.

Authorship and contributors

- 1.8 The author of this report is Kevin Murphy B.Arch MUBC RIBA IHBC. Kevin was an Inspector of Historic Buildings in the London Region of English Heritage and dealt with a range of major projects involving listed buildings and conservation areas in London. Prior to English Heritage, he had been a conservation officer with the London Borough of Southwark and was Head of Conservation and Design at Hackney Council between 1997 and 1999. He trained and worked as an architect and has a specialist gualification in urban and building conservation. Kevin has dealt with a number of listed rural properties including proposals for the Grade II* Brandsby Hall in Yorkshire, the suitability of the Grade I Holkham Hall in Norfolk for a listed building management agreement, works to a Grade II barn in Hampshire, the conversion of the Grade II Streete Court in Surrey to hotel use, the repair and alteration of the Grade II Holmesdale Farmhouse in Sussex, and others.
- 1.9 Additional support was provided by Anne Roache MA. MSc. Anne is an experienced heritage professional who has worked for leading commercial organizations in the fields of property, planning and law. She has a specialisation in the archaeology, architectural and social history of London.

2 The site and its context

Introduction

- 2.1 This section of the report describes the site and its heritage significance. It draws on work undertaken by Gregori Chiarotti Projects for the Heritage Statement accompanying the withdrawn 2022 application for planning permission and listed building consent. The Gregori Chiarotti work included a review of the available planning history of the site. Figures below are courtesy of the Gregori Chiarotti research. Clopton Hall and its grounds is referred to as the site in this report.
- 2.2 This section of the report contains some illustrations of the building and historical proposals. The Design & Access Statement prepared by Gregori Chiarotti Projects contains a much larger range of visual information and should be referred to when reading this section. That information includes: historical planning application drawings and detailed photo sheets of the exterior and interior of the property

Clopton Hall

- 2.3 Clopton Hall is a country house located approximately one kilometre north east of the village of Rattlesden in Suffolk. The site comprises the house, the landscaped gardens to the south, a partial medieval moat and some out buildings. It is adjacent to Clopton Hall farmstead, known as Clopton Green Farm, in separate ownership, to the north.
- 2.4 The Clopton Hall that is the subject of this application should not be confused with the Grade II listed building with the same name located in the village of Clopton near Woodbridge, or the Grade II* listed building of the same name at Clopton Green (Wickhambrook), both also in Suffolk.



Figure 1: Clopton Hall location (indicated by pin)



Figure 2: Clopton Hall looking northwest from the gardens

2.5 The building was listed Grade II in 1954, and the list description reads as follows:

RATTLESDEN CLOPTON GREEN TL 95 NE 3/87 Clopton Hall - (formerly listed as Clopton 15.11.54 Hall and stables) - II Former manor house, late C16 core with alterations of 1681 as dated on chimney, and later. Timber-framed and plastered, with rusticated quoins of c.1681 and coved eaves cornice. Plaintiled roofs, the wings hipped. External early C17 chimneys of red brick with diaper-patterned terracotta friezes around base of shafts. (the date 1681 in plaster upon one chimney indicates a remodelling date). An axial chimney of red brick at centre of main range. C19 flat roofed dormers with sashes. Half-H plan: a 3-window main range, with set-forward wings to left and right. 2 storeys and attics. Sashes probably of c.1681: pairs of 24-light small-paned sashes linked by a mullion; a rare survival in Suffolk, although most or all of the sashes are C19 or C20 replacements. Flush frames and square panes with thick glazing bars. Central entrance with giant Doric pilasters and segmental pediment: a 6-panelled entrance door with pediment was restored c.1980 (a 2 storey flat-roofed C19 porch-obscuring the earlier entrance was removed at this time). Interior believed to have C17/C18 panelling, and some panelling of C17 with arcaded overmantel. A rear extension of 1835 (later remodelled) together with extensive wrought iron verandahs was demolished c.1980. Partial medieval moat.

- 2.6 The list description was most recently amended in 1988.
- 2.7 Clopton Hall, therefore, and to paraphrase and extend the list description, is a former hall house that was built circa 1585 and is known to have been remodelled in 1681. It has two stories with attics above, and it is built over a partial basement. The property has a 4-window main range façade with set-forward hipped wings on a half-H plan layout. The flat roofed dormers with sashes date from the 19th century. The property is timber framed and rendered elevations with rusticated guoins of c.1681 and coved eaves cornice. Part of the building was burnt down and replaced in the 19th century. The property was at one point much more substantial, with a rear extension and wrought iron verandas along two sides dating from 1835. These were demolished around 1980. A two-storey flatroofed 19th century porch was obscuring the earlier entrance and it was also removed c.1980. The top of the east chimney was rebuilt in the 1980s after it was damaged by heavy gales and smashed part of the roof in January 1976. The dislodged moulded bricks were reinstated. The sash windows probably date from c.1681 with flush frames and square panes with thick glazing bars. The front and rear elevation pairs of small-paned sash windows linked by a mullion are a rare survival in Suffolk, although most or all of the sashes are 19th-20th century replacements.

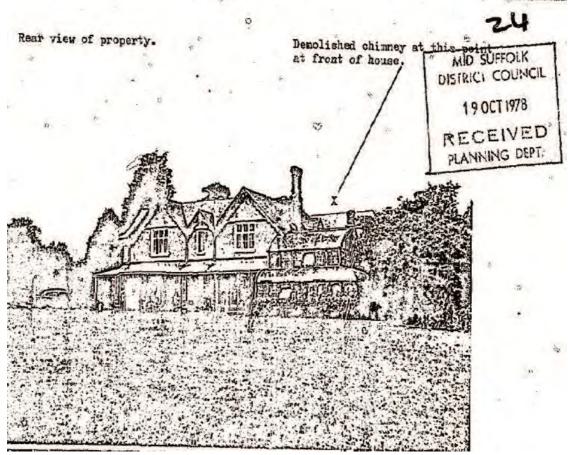


Figure 3: Photograph from Planning Application ref: N/73/2371/TW granted January 1974 for "alterations and conversion of main building and outhouses"



Figure 4: Existing Front Elevation Drawing from Planning Application ref: N/73/2371/TW, ibid

- 2.8 On entering the house, the panelled front door opens into the double height entrance hall. Off the entrance hall are two of the principal reception rooms, the dining room and library, which are well proportioned and retain many period features including open fireplaces and panelling. The drawing room, located in the west wing, can be accessed either through the library or from the porch on the western elevation. The large kitchen/breakfast room sits within the east wing of the property along with the adjoining boot room and secondary staircase to the first floor. On the first floor there are four spacious bedrooms, including the principal bedroom with an en-suite bathroom. In addition there is a study and a large family bathroom. From the first floor there are two staircases, one in the east wing and one in the west wing, servicing the second floor at either end of the property. On the second floor there are four bedrooms, partially height restricted, with a bathroom and two store rooms.
- 2.9 To the north of the Hall, there is a partial medieval moat which is also still visible to the front and eastern side of the Hall. The property is approached from the north along a drive past Clopton Green Farm from Green Road, past the adjacent farm and across a bridge over the moat. The house was commandeered during the Second World War by American forces and the road to the house was introduced in order to move heavy vehicles, and the bridge dates from this period. It is in a poor condition.



Figure 5: Ordnance Survey 1884

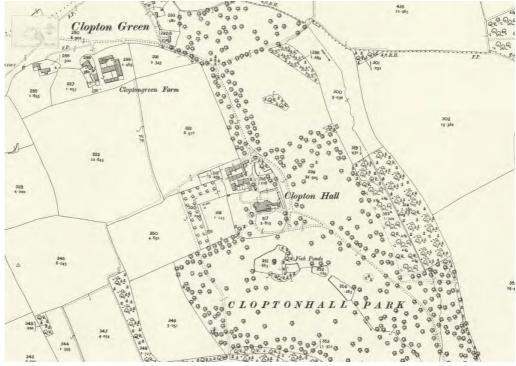


Figure 6: Ordnance Survey 1904



Figure 7: Ordnance Survey 1952

The heritage context of the site

- 2.10 The heritage context of the site has been established through a search of the Suffolk Historic Environment Record (using the Suffolk Heritage Explorer), the National Heritage List for England and resources provided by Mid-Suffolk District Council.
- 2.11 Clopton is, as noted above, a Grade II listed building. There are no conservation areas; the nearest conservation area is the Rattlesden Conservation Area, covering that village, and topography prevents visibility of Clopton Hall from the village. There are no other designated heritage assets possessing intervisibility with the site. Figure 8 shows the Hall in relation to designated heritage assets... For the purposes of this report we have considered the Clopton Hall farmstead and the Clopton Hall park as nondesignated heritage assets. Figure 9 shows the Hall in relation to its landscaped gardens and the Clopton Hall farmstead to the north.

The heritage significance of the site and its context

Assessing heritage significance: concepts and terminology

2.12 World Heritage Sites, scheduled monuments, listed buildings, protected wreck sites, registered parks and gardens, registered battlefields or conservation areas are 'designated heritage assets', as defined by the National Planning Policy Framework (NPPF). Other buildings and structures identified as having heritage significance can be considered as 'non-designated heritage assets', and this can include locally listed buildings or assets included in the local HER.



Figure 8: heritage assets in the vicinity of Clopton Hall © 2023 Babergh District Council and Mid Suffolk District Council



Figure 9: Extract from HER mapping, with HER asset reference numbers ©2023 Suffolk County Council

2.13 Heritage 'significance' is defined in the NPPF as

'the value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting'.

2.14 The Historic England '*Historic Environment Good Practice Advice in Planning Note 2*' puts it slightly differently - as 'the sum of its architectural, historic, artistic or archaeological interest'.

- 2.15 'Conservation Principles, Policies and Guidance for the sustainable management of the historic environment' (English Heritage, 2008) describes a number of 'heritage values' that may be present in a 'significant place'. These are evidential, historical, aesthetic and communal value.
- 2.16 'Heritage significance' and 'heritage values' are assumed to be conceptually equivalent to each other, and to the statutory term which is the '*special architectural or historic interest*' of a listed building or a conservation area.

'Historic interest' or 'Historical', 'Evidential' or 'Communal' value

- 2.17 Clopton Hall is a familiar building type: a country house that has grown by adaptation from simpler (though still probably patrician) origins in the Early Modern period through 19th and 20th century modifications to the circumstances in which we find it today. The country house typology is central to not just the architectural history but the social history of England generally and the countryside in particular, representing as it does so many aspects of society and culture over an extended period. Country houses have, by definition, a direct relationship to the life, economy and culture of the rural landscape and Clopton Hall is not just significant for its relationship to the adjacent farmstead, outbuildings and its landscaped gardens, but also for its links to the wider (and ongoing) agricultural landscape as well.
- 2.18 In terms of Historic England's 'Conservation Principles' the building provides us with 'evidence about past human activity' and by means of its fabric, design and appearance communicates information about its past.

'Architectural interest', 'artistic interest' or 'aesthetic value'

2.19 Though its origins lie in a 16th century hall house there is little in the Hall now that is legible of that ancestry, though the symmetrical plan with central entrance hall and lateral reception rooms in relation to the (later) wings

does allow a sense of how the original hall house might have been experienced.

- 2.20 In aesthetic terms, Clopton Hall is an example of the 'Georgianising' of earlier buildings that occurred from the late 17th century onwards, and is highly significant for that reason alone. It is a good example of how at a certain point historically (i.e. the Restoration) when confidence and money combined to invest in the emerging fashionable classical styles experienced by wealthy individuals on the Grand Tour. It retains core fabric from this era, overlaid with the 19th century alterations and interventions that are also an imitable feature of this typology and represent a second point in time when wealth enabled further elaboration. The aesthetic significance of the house lies in not just its Early Modern or late 17th century style, but in the subsequent 19th and 20th century changes and the visual story they tell about the building.
- 2.21 That said, the Hall and its curtilage has experienced less than entirely sensitive intervention over time and particularly during the later 20th century period. In addition, and as is common with many country houses (and the reason for the demise of many) the upkeep and maintenance of the Hall has not necessarily kept pace with the demands and challenges of a building built and altered over more than four centuries. While this has not obscured the overall significance of the site in any essential way, it has the potential to do so unless significant works to repair and upgrade the listed building are undertaken.
- 2.22 A key aspect of the Hall's heritage significance is that the interventions in the building's fabric have been many and various over an extended period, and some internal work is clearly intended to mimic earlier work. Alteration has occurred at some times in a major way (and this is referred to above), but on many other occasions specific works window replacement, introduction of the 2nd-3rd

floor stairs, insertion of services, creation of ensuite bathrooms, etc - has occurred in a random and anonymous fashion, in varying degrees of formality and quality and with varying effects on the more centrally significant aspects of the overall listed building. The heritage sensitivity of the Hall thus varies considerably throughout the building.

Conclusion

2.23 Despite the depredations of time and the challenges of upkeep, Clopton Hall remains an important listed building that possesses clear evidential, historical, aesthetic and communal value. It is a very good example of the English country house. It contains within its fabric and expresses in its appearance the evolution of this typology over a number of centuries with all the aesthetic, historical, social and economic associations that such a building has.

3 The legislative, policy and guidance context

Introduction

3.1 This section of the report briefly sets out the range of national and local policy and guidance relevant to the consideration of change in the historic built environment.

The Planning (Listed Buildings and Conservation Areas) Act 1990

- 3.2 The legislation governing listed buildings and conservation areas is the Planning (Listed Buildings and Conservation Areas) Act 1990 ('the Act').
- 3.3 Section 16(2) says that 'In considering whether to grant listed building consent for any works the local planning authority or the Secretary of State shall 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'
- 3.4 Section 66(1) of the Act says that 'In considering whether to grant planning permission for development which affects a listed building or its setting, the local respects listed planning authority or, as the case may be, the Secretary of State shall 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'.
- 3.5 Section 72(1) of the Act requires decision makers with respect to any buildings or other land in a conservation area to pay 'special attention... to the desirability of preserving or enhancing the character or appearance of that area'.

The National Planning Policy Framework

3.6 The National Planning Policy Framework (NPPF) was first published in 2012 with the most recent update being published on 20 July 2021¹

Proposals affecting heritage assets

- 3.7 Chapter 16 of the National Planning Policy Framework: 'Conserving and enhancing the historic environment' deals with Heritage Assets describing them as 'an irreplaceable resource' that 'should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations' (paragraph 189).²
- 3.8 Paragraph 194 brings the NPPF in line with statute and case law on listed buildings and conservation areas. It says that:

'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.'

3.9 In terms of the local authority, paragraph 195 requires that they:

'identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a

¹ First published on 27 March 2012 and updated on 24 July 2018, 19 February 2019 and 20 July 2021. Ministry of Housing, Communities & Local Government (2021) Revised National Planning Policy Framework. Online: www.gov.uk/guidance/national-planning-policy-framework

² The policies set out in this chapter relate, as applicable, to the heritage-related consent regimes for which local planning authorities are responsible under the Planning (Listed Buildings and Conservation Areas) Act 1990, as well as to planmaking and decision-making.

heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.'

3.10 Paragraph 197 says that 'In determining applications, local planning authorities should take account of:

a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;

b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and

c) the desirability of new development making a positive contribution to local character and distinctiveness.'

Considering potential impacts

- 3.11 Paragraph 199 advises local planning authorities that '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.'
- 3.12 Paragraph 200 continues: 'Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:

a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;

b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.' ³

3.13 In terms of proposed development that will lead to substantial harm to (or total loss of significance of) a designated heritage asset, paragraph 201 states that 'local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

(a) the nature of the heritage asset prevents all reasonable uses of the site; and

(b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and

(c) conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and

(d) the harm or loss is outweighed by the benefit of bringing the site back into use.'

- 3.14 It continues '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' (paragraph 202).
- 3.15 In considering the effect of an application on the significance of a non-designated heritage asset the local authority should employ a 'balanced judgement' in

³ Non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets.

regard to the scale of any harm or loss and the significance of the heritage asset (paragraph 203).

- 3.16 Paragraph 204 requires that 'Local planning authorities should not permit the loss of the whole or part of a heritage asset without taking all reasonable steps to ensure the new development will proceed after the loss has occurred' (paragraph 204).
- 3.17 Where a heritage asset is to be lost, the developer will be required to 'record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible' (paragraph 205).⁴
- 3.18 In terms of development within the setting of heritage assets, paragraph 206, advises that 'local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably' (paragraph 206).
- 3.19 The setting of a heritage asset is defined in the NPPF as:

'The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral'.⁵

 ⁴ Copies of evidence should be deposited with the relevant historic environment record, and any archives with a local museum or other public depository.
⁵ https://www.gov.uk/guidance/national-planning-policy-framework/annex-2-glossary

Planning Practice Guidance

- 3.20 Planning Practice Guidance⁶ provides streamlined guidance for the National Planning Policy Framework and the planning system. The section entitled 'Conserving and Enhancing the Historic Environment' gives guidance on matters relating to protecting the historic environment under the following headings:
 - Overview: historic environment;
 - Plan making: historic environment;
 - Decision-taking: historic environment;
 - Designated heritage assets;
 - Non-designated heritage assets;
 - Heritage Consent Processes; and
 - Consultation and notification requirements for heritage related applications.

Historic England Planning Advice⁷

Good Practice Advice

- 3.21 Historic England publish guidance regarding the setting of heritage assets and how to assess the effect of change on that setting. This provides 'information on good practice to assist local authorities, planning and other consultants, owners, applicants and other interested parties in implementing historic environment policy in the National Planning Policy Framework (NPPF) and the related guidance given in the national Planning Practice Guide (PPG)'.
- 3.22 These notes are:

⁶ Ministry of Housing, Communities & Local Government (2019). Revised National Planning Policy Framework. Online: www.gov.uk/guidance/conservingand-enhancing-the-historic-environment

⁷ Historic England, *The Planning System*, Online:

historicengland.org.uk/advice/planning/planning-system

- GPA 1: The Historic Environment in Local Plans (2015);
- GPA 2: Managing Significance in Decision-Taking in the Historic Environment (2015);
- GPA 3: The Setting of Heritage Assets (2nd ed., 2017);
- GPA 4: Enabling development and heritage assets (2020).

Historic England Advice Notes

- 3.23 These advice notes covering various planning topics in more detail and at a more practical level. They have been prepared by Historic England following public consultation.
- 3.24 The documents most relevant to the proposed development are:
 - HEAN 2 Making Changes to Heritage Assets
 - HEAN 10 Listed Buildings and Curtilage
 - HEAN 12: Statements of Heritage Significance: Analysing Significance in Heritage Assets

Conservation Principles, Policies and Guidance for the sustainable management of the historic environment

3.25 This document⁸ has been referred to in Section 2 of this report. It describes a number of 'heritage values' that may be present in a 'significant place'. These are evidential, historical, aesthetic and communal value. The conservation area, listed buildings and locally listed buildings have evident special architectural and historic interest. Any proposals for the site must have regard for the preservation of this special interest.

⁸ English Heritage (2008) Conservation Principles, Policies and Guidance for the sustainable management of the historic environment. Online: https://historicengland.org.uk/images-books/publications/conservation-principles-sustainable-management-historic-environment

The Mid-Suffolk Local Plan

- 3.26 For the purposes of this report, and given the location of the site, the heritage policies of the Mid-Suffolk Local Plan have been used to assess the effect of the proposed works on the special architectural or historic interest/heritage significance of Clopton Hall.
- 3.27 However, the 1998 Local Plan document is being replaced by a new Joint Local Plan document for Babergh and Mid Suffolk districts. The 1998 Local Plan has mostly been superseded by policies from the Core Strategy and Focussed Review and the Stowmarket Area Action Plan.
- 3.28 Reference has also been made to the heritage policies of the Babergh Local Plan, and no conflict or omission has been identified (specifically with saved Babergh Local Plan policy CN06 'Listed Buildings -Alteration/Extension/Change of Use').
- 3.29 The heritage policies in the Local Plan that are relevant to the proposals for Clopton Hall are as follows. All are 'saved' policies.
- 3.30 HB1 'Protection of historic buildings': this states that 'The District Planning Authority places a high priority on protecting the character and appearance of all buildings of architectural or historic interest. Particular attention will be given to protecting the settings of listed buildings'
- 3.31 HB2 'Demolition of listed buildings' seeks to prevent the demolition of listed buildings save for the existence of 'exceptional circumstances'.
- 3.32 HB3 'Conversions and alterations to historic buildings' states that

Proposals for the conversion of, or alteration to, listed buildings or other buildings of architectural or historic interest will only be permitted in exceptional circumstances and will be required to meet high standards of design, detailing, materials and construction. Listed building consent will be granted if the district planning authority is satisfied that:-

- The proposal would not detract from the architectural or historic character of the existing building or its setting;

- And, in the case of a timber framed building, the structure of the frame including its infill material remains largely unaltered.

3.33 HB4 'Extensions to listed buildings' says that:

Listed building consent will be granted for the extension of listed buildings if the district planning authority is satisfied that:-

- the proposed extension will not dominate the original building by virtue of its siting, size, scale or materials;

- the proposal does not detract from the architectural or historic character both externally and internally for which the building is listed.

- 3.34 HB5 'Preserving historic buildings through alternative uses' states that 'The District Planning Authority will support the use of buildings of architectural or historic interest in a manner compatible with their character and setting... the change of use of listed buildings or other buildings of historic or architectural interest will be approved if the proposed use preserves the building and its setting without undue alteration.
- 3.35 HB7 'Protecting gardens and parkland of historic interest' states that 'The District Planning Authority will refuse development that would adversely affect the character, appearance or landscape features of gardens or parkland of historic interest, particularly those included in the national register compiled by English Heritage'

4 The proposed works and their effect

Introduction

- 4.1 This section of the report describes the proposed works to Clopton Hall and its site in terms of their effect on the heritage significance of the site and its context, described and analysed earlier in this report.
- 4.2 The proposed scheme is described in the drawings, Schedule of Works and Design & Access Statement by Gregori Chiarotti Projects submitted with the application, and in other submission documents.
- 4.3 Pre-application advice was sought from the local planning authority in respect of the proposals and the ongoing evolution of the design in response to this advice is detailed in the Design & Access Statement.

The need for and purpose of the proposed scheme

- 4.4 Clopton Hall is a country house. That is its original use, its optimum viable use and its intended use.
- 4.5 As noted earlier in this report, the property has experienced some insensitive intervention over time and the upkeep and maintenance of the Hall has not necessarily kept pace with the demands and challenges of a large and complex listed building built with a long history.
- 4.6 The property is now in need of significant investment to repair and refurbish the site as a whole in order to permit its continued use as a country house and to sustain that use for the long term. This objective is consistent with and will result in the preservation and enhancement of Clopton Hall as a building of special architectural or historic interest.

The proposed scheme

4.7 The proposed works to Clopton Hall are set out in detail (and with illustrations) in the Schedule of Works that

accompanies the applications. The submission includes door and window drawings and individual room drawings.

- 4.8 In summary these works include:
 - Alteration of the stairs and the insertion of new flights of stairs in the west wing of the house and associated works (see the Design & Access Statement for a detailed account of the proposals, investigative works and discussions with the local planning authority)
 - New lead roof with roof lights set flush to the east one-storey side addition and associated works.
 - The removal of modern fittings and the new installation of kitchen, cloakroom, WC, ensuite and bathrooms.
 - All existing windows to be repaired.
 - The demolition of the shed and oil tank to the south-east of the main house; the existing oil tank to be relocated and replaced with double skin underground fuel oil tank.
 - Erection of a new barn-style L-shaped building on the site of the shed and oil tank, which will provide garage and storage space, turning its external walls toward the garden, thereby screening car-related activity from the south elevation and garden.
 - The existing boundary wall to be repaired and the construction of new front and side gates.
 - The bridge on the moat to be replaced by grass ground banks.
 - The removal of non-original balustrade walls on the rear elevation.
 - New front landscaped garden.

- The renewal of the heating system and the installation of an air source heat pump system.
- Installation of photovoltaic solar panels on garage roof.

The effect of the proposed works on heritage significance

- 4.9 The above list might give the impression of a substantial project affecting the Hall; the proposals are, in fact modest. Individually and cumulatively the proposed works intervene at the site in a specific way that is sufficient, in each instance, to repair, renew and upgrade to the extent needed. The works are far from excessive and are commensurate with the overall purpose of the project to preserve the special interest of the Hall while securing its optimum viable use for the future.
- 4.10 Where fabric is affected by the proposed works, careful consideration has been given to its individual significance in the context of the overall significance of the Hall. A balance has been sought between preserving/avoiding interference in historic fabric and reasonable intervention in fabric of more recent date to satisfy practical domestic needs. This applies to all the works in and to the main listed building and to boundary walls.
- 4.11 A specific example is the lack of connection between storeys and the separated locations of stairs that makes circulation in the house difficult. The proposal for new stairs, from ground to second floors, in the west wing and the creation of new hallways will address this issue. As part of this, the relatively recent (19th or early 20th century) stairs from first to second floor and the associated partition will be removed to improve access and permit the creation of an ensuite bathroom to Bedroom 2. This work has been finalised on the basis of physical opening up and investigation, discussion with the local planning authority and examination of options in order to reach the optimum solution that balances

heritage significance against improvements to the house. It also provides the heritage benefit of removing the stairs from its harmful position straddling an original window.

- 4.12 The replacement of an oil tank and shed with a new barnlike structure to provide covered parking and storage space occurs in a location removed from the main house and it will be screened so as to maintain the overall pastoral appearance of the view south from the Hall. That said, the design uses a vernacular style to satisfy a practical need and the structure will sit comfortably as a clearly ancillary building to the Hall. Photovoltaic solar panels will be screened from the main house.
- 4.13 Works to the moat bridge and the grounds will reinstate a more appropriate landscaped setting for the Hall. The bridge is a relatively modern and clumsy construction and its removal, along with landscaping work generally, will enhance the setting of the listed building.
- 4.14 There will be a modestly positive effect on the setting of the adjacent unlisted farmstead from the proposed works and ongoing use of the house.

Summary and conclusion: the effect of heritage significance

- 4.15 In summary, that which is important in heritage terms and which survives at Clopton Hall, is protected, repaired and successfully integrated by means of the proposed works. The overall proposals respect the special architectural or historic interest of the Hall and its grounds. They preserve and enhance that special architectural or historic interest while updating the building for continued use as a home.
- 4.16 The analysis that we have undertaken and which is set out above leads us to conclude that the proposals for Clopton Hall will preserve the special architectural or historic interest of the Grade II listed building.
- 4.17 We consider that the proposed scheme will not just preserve heritage significance and special architectural or

historic interest, but positively enhance heritage significance and special interest over their present circumstances, for the reasons given in this section of the report. No harm to heritage significance is caused by the proposed scheme. This point is discussed further in the next section of the report.

5 Compliance with legislation, policy and guidance

Introduction

5.1 This report has provided a detailed description and analysis of the heritage significance of Clopton Hall and its context, and has described how the proposed works would affect that heritage significance.

The Planning (Listed Buildings and Conservation Areas) Act 1990

- 5.2 The conclusion of our assessment, contained in previous sections in this report, is that the proposed works preserve and enhance the special architectural and historic interest of Clopton Hall and will have no effect on any conservation area. The proposed scheme thus complies with Sections 66(1) and 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990.
- 5.3 To be clear, our assessment is that the proposal goes beyond mere preservation and will enhance the special architectural or historic interest of the listed building.

The National Planning Policy Framework

The level and nature of 'harm' caused by the proposed development

- 5.4 Having concluded that the proposal will preserve and enhance the relevant designated heritage assets, we now consider whether harm – in the sense used by the National Planning Policy Framework – is caused to these heritage assets.
- 5.5 As outlined in Section 3, the NPPF identifies two levels of potential 'harm' that might be caused to a heritage asset by a development: 'substantial harm (or total loss of significance)' or 'less than substantial' harm. Both levels of harm must be caused to a *designated* heritage asset in this instance the Grade II Clopton Hall and its curtilage

structures. Harm to non-designated heritage assets is not allocated a level.

- 5.6 The only potential for 'substantial harm' (Paragraph 201 of the NPPF) would be if the proposed development for the site caused the loss of something *central* to the special interest of Clopton Hall. The proposed works evidently do not give rise to this level of harm.
- 5.7 Similarly, we also do not believe that any net 'less than substantial harm' (Paragraph 202 of the NPPF) to the listed buildings is caused by the proposed works, given that they categorically result in securing the optimum viable use of the site - a public benefit explicitly identified in the NPPF⁹. Our analysis of the proposed works, provided earlier in this report, when considered in relation to legislation, policy and guidance, concludes that no harm is caused to special interest or significance. This is explained further below.
- 5.8 The existing listed building, as a result of less than appropriate interventions (such as the first to second floor stairs in the west wing plus later interventions) and a lack of maintenance in the past, has already experienced a degree of harm to its core heritage significance. Removal of, say, the first to second floor stairs in the west wing, may cause a very minor loss of evidential value - at some point in the relatively recent history of the building a clumsy intervention that obscured an original window was made to create utilitarian access stairs to the second floor. The intervention resulted in the loss of earlier but not notably significant fabric and introduced fabric of no notable value in itself. What evidence is provided by this feature of the listed building is negligible in its contribution to the overall heritage values that make up the building's significance. Its removal is of similarly little note, but the reinstatement of the adjacent window is a notably positive step.

⁹ At Paragraph 202

5.9 The net result of all the interventions involved in the proposed works is indisputably enhancing and positive. The existing harm to the heritage significance of the site is reversed, and this conclusion is wholly valid while taking account of interventions such as the removal of the stairs as discussed above. A sensible and reasonable assessment of the overall project, its effects and its benefits leads to a reliable conclusion that no harm is, on balance, caused by the proposals.

Specific requirements of the NPPF in respect of heritage assets

- 5.10 This report has referred to and used a detailed description and analysis of the significance of the site and its heritage context, as required by Paragraph 194 of the National Planning Policy Framework.
- 5.11 The proposed development complies with Paragraph 199 of the NPPF in that it conserves the heritage assets affected. Special architectural or historic interest is preserved and enhanced, and no harm to heritage significance is caused. Paragraphs 200, 201 and 202 of the National Planning Policy Framework are therefore not engaged in consideration of the proposed works. Paragraph 203 is not relevant in this instance.
- 5.12 In summary, the proposed works very definitely strike the balance suggested by the NPPF they intervene in the relevant designated heritage asset, Clopton Hall, in a manner commensurate to its special interest and heritage significance. This balance of intervention versus significance is described in detail earlier.

Mid-Suffolk Local Plan

- 5.13 In addressing the requirements of the NPPF the proposal fully respects and comply with the saved heritage policies of the Mid-Suffolk Local Plan.
- 5.14 No demolition affecting the listed building is proposed (Policy HB2) nor is it proposed to extend the listed

building (Policy HB4). The proposed works clearly comply with Policy HB3 'Conversions and alterations to historic buildings' in that they obviously 'meet high standards of design, detailing, materials and construction' and will 'not detract from the architectural or historic character of the existing building or its setting'.

6 Summary and conclusion

- 6.1 After an Introduction, this report, at Section 2, sets out a brief history of the site and its context, identifies the heritage assets, and assesses heritage significance. Section 3 identifies the legislative, policy and guidance context for the development. The proposed scheme and its heritage effects are assessed in Section 4.
- 6.2 In terms of the heritage significance of the listed building, we conclude that despite the depredations of time and the challenges of upkeep, Clopton Hall remains an important listed building that possesses clear evidential, historical, aesthetic and communal value. It is a very good example of the English country house. It contains within its fabric and expresses in it appearance the evolution of this typology over a number of centuries with all the aesthetic, historical, social and economic associations that such a building has.
- 6.3 The proposed works will involve significant investment to repair and refurbish the site as a whole in order to permit its continued use as a country house and to sustain that use its optimum viable use for the long term. This objective is consistent with and will result in the preservation and enhancement of Clopton Hall as a building of special architectural or historic interest.
- 6.4 We conclude that the things that are important in heritage terms and which survive at Clopton Hall are protected, repaired and successfully integrated by means of the proposed works. The overall proposals respect the special architectural or historic interest of the Hall and its grounds. They preserve and enhance that special architectural or historic interest while updating the building for continued use as a home. The analysis that we have undertaken and which is set out in this report leads us to conclude that the proposals for Clopton Hall will preserve the special architectural or historic interest of the Grade II listed building.

6.5 Section 5 demonstrates how the proposed works will comply with legislative, policy and guidance. The proposed works will comply with S.66(1) and S.72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990. The proposed scheme is consistent with the design and heritage policies of the National Planning Policy Framework, and Mid-Suffolk's Local Plan.



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