

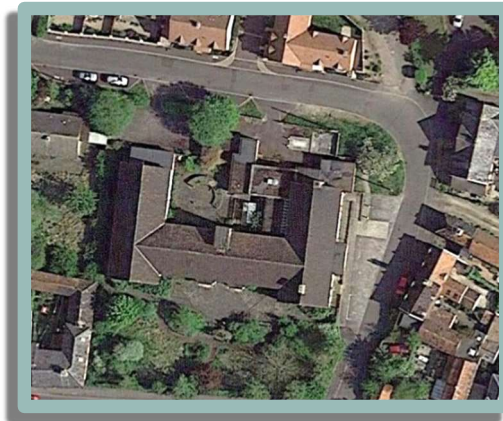
Paddock House

Wellington Road
Eye
Suffolk IP23 7BG

Architectural Management

Architecture and Heritage Consultants

**ADDENDUM TO
HERITAGE STATEMENT
FOR
A NEW HOUSING SCHEME**



November 2023

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1.0 Introduction and Purpose

This document is an addendum to the Heritage Statement produced in October 2019. It is intended to accompany a Planning Application by Icen Homes for minor amendments to the scheme proposals. The object of this addendum is to consider the impact of the changes to the design upon the setting of the nearest Listed buildings and of the Conservation Area.

The site under consideration is Paddock House, Wellington Road, Eye, Suffolk IP23 7BE.

It is produced by Ian Alderton of Architectural Management Ltd. upon commission by Mid Suffolk authority.

This report is to be read in conjunction with the architectural proposals produced by Ingleton Wood architects.

This report will not repeat the information contained in the previous report but will concentrate upon the impact of the proposed changes to the design.

During the assessment of the setting, no detailed historical research into the development of the area has been undertaken. The specific aim of this report is to assess the effect of the changes to the scheme upon the setting of the nearby Listed buildings and the Conservation Area.

The format, techniques and content of this Assessment draw upon the guidance from the English Heritage Publication; Conservation Principles: Policies and Guidance (dated 23rd April 2008), supported by Historic England.

The Guidance provides a comprehensive framework for the sustainable management of the historic environment, within which 'Conservation' is defined as the process of managing change to a significant place and its setting in ways that will best sustain its heritage values, while recognising opportunities to reveal or reinforce those values for present and future generations.

2.0 Preamble

The NPPF Paragraph 194 states 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.*

The application site does not contain any Listed Buildings but is within the vicinity of a several listed buildings and also within the town Conservation Area and could have an impact on their setting.

With regard to Paragraph 194 of the NPPF, the level of detail supplied within this Assessment is considered to be proportionate to the potential impact of the changes proposed to the development, upon the setting.

3.0 General Description of the Application Site

See previous report.

4.0 The Existing Building

The existing building has been demolished and the site cleared.

5.0 Heritage Assets

For reference - copied from previous report.

There are no Listed buildings within the application site. The adjacent heritage assets of note are:

- 14 – 28 Church Road to the south of the proposal site on the opposite side of the road
- 35/36 Wellington Road to the east of the proposal site on the opposite side of the road
- The town Conservation Area

Church Road



The image left shows No's. 22 to 14 Church Road. These are directly opposite the proposal site.



The image right shows No's. 24 – 28 Church Road. These are to the south east of the proposal site.

Wellington Road



The image left shows 35/36 Wellington Road. The two cottages are opposite the eastern side of the site.



The image right shows the church tower which can be seen in rare glimpses from the north side of the site on Wellington Road.

Eye Town Conservation Area



The proposal site is within the Town Conservation Area.

The immediate environs of this part of the CA are predominately in residential use along this part of Church Street and Wellington Road. There is no particular characteristic to describe in this part as it is varied, with a mixture of historic and late C20th housing (especially the most recent new development on the maltings site directly to the north). The buildings on the south side of the street (opposite the site) tend to be set on the back edge of the pavement and be closely spaced or terraced, creating a dense enclave of housing, which narrows and intensifies as one passes the site going eastwards..

The image above shows Church Road, opposite the south side of the site. The trees on the left of the image are those in the foreground of the proposal site.



The image left shows the view westwards along Church Road, with the proposal site on the right of the image behind the trees.

The image right is looking eastwards along Wellington Road with the proposal site on the right of the image. The boundary of the Conservation Area runs along the back edge of the right hand path.



6.0 Description of the Proposals

The proposed application is for the addition of PV panels upon the south and some west facing roof slopes of each of the blocks of buildings.

The proposal can be read from the Ingleton Wood drawings. Below is the overall site plan.



The bank of trees to the south side of the site, between Plots 1 – 3 and Church Street, remains in the proposal.

The proposed PV panels are the flush fixed type, where the upper plane is in line with the roof finishes, as opposed to sitting on top. This gives a more discrete, integrated look to the panels.

7.0 Impact Assessment

Criteria for Assessment

The following section assesses the significance of the setting of the heritage asset, in accordance with Section 16 of the NPPF and Historic England: Conservation Principles: Policies and Guidance and The Setting of Heritage Assets Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (Second Edition) (referred to henceforth as GPA3).

The assessment of how the proposed development will potentially impact upon the setting of the identified heritage assets has been undertaken using the guidance detailed in GPA3. This recommends that an assessment should take into account the following factors when assessing the impact of a development:

- Location and Siting;
- Form and Appearance;
- Additional Effects; and
- Permanence.

The level of change will be assessed upon the following criteria:

Level of Change	Description
Major Beneficial	The proposed changes will substantially alter key elements of the heritage asset in a positive way, better revealing and/or enhancing important characteristics. There would be a substantial improvement to the understanding of important elements of the asset's significance.
Moderate Beneficial	The proposed changes will have a considerable positive effect on key elements of the heritage asset, such that they improve the overall character or significance of the heritage asset. There may be an improvement in key uses and beneficial change (e.g. the creation of coherency) to the characteristics of the asset.
Minor Beneficial	The proposed changes may cause a minor improvement to the character of a heritage asset.
Negligible	The proposed changes will have a very minor effect upon on the heritage asset or very minor impact on the overall character of the surrounding context.
Neutral	The proposed changes will have no impact on the overall character of the surrounding context.
Minor Adverse	The proposed changes will have minor impact on key elements of the heritage asset, such that the overall character of a heritage asset is negatively affected. Change of this magnitude may be acceptable if suitable mitigation is carried out.
Moderate Adverse	The proposed changes will have a considerable negative effect on the overall character and significance of the heritage asset. It will likely disturb key features and be harmful to overall heritage significance. Change of this magnitude should be avoided where possible, but can be minimised or neutralised through positive mitigation.
Major Adverse	The proposed changes will cause a substantial disruption to, or, in some cases, the complete destruction of important features of the heritage asset, such that its significance is substantially harmed. Change of this magnitude should be avoided.

In order to more fully understand the effect of the impact of proposals the following assessment provides a comparable analysis of the heritage value against the level of change. This assessment is based on the criteria set out by International Council on Monuments and Sites* and is a clear way of understanding not just the impact of change but how levels of impact vary according to the value of the heritage asset.

Overall level of impact				
Level of Change	Sensitivity/Significance			
	Neutral	Low	Medium	High
Major Beneficial	Slight	Slight/Moderate	Moderate/Large	Large/Very large
Moderate Beneficial	Neutral/Slight	Slight	Moderate	Moderate/Large
Minor Beneficial	Neutral/Slight	Neutral/Slight	Slight	Slight/Moderate
Negligible	Neutral	Neutral/Slight	Neutral/Slight	Slight
Neutral	Neutral	Neutral	Neutral	Neutral
Negligible	Neutral	Neutral/Slight	Neutral/Slight	Slight
Minor Adverse	Neutral/Slight	Neutral/Slight	Slight	Slight/Moderate
Moderate Adverse	Neutral/Slight	Slight	Moderate	Moderate/Large
Major Adverse	Slight	Slight/Moderate	Moderate/Large	Large/Very large

The following levels of harm may potentially be identified:

- **Substantial harm or total loss.** Harm that would ‘have such a serious impact on the significance of the asset that its significance was either vitiated altogether or very much reduced’
- **Less than substantial harm.** Harm of a lesser level that that defined above
- **No harm (preservation).** A High Court Judgement of 2014 held that with regard to preserving the setting of Listed building or preserving the character and appearance of a Conservation Area, ‘preserving’ means ‘doing no harm’.

Preservation does not mean no change; it specifically means no harm. Historic England guidance states that*Change to heritage assets is inevitable but it is only harmful when significance is damaged.* Thus change is accepted in Historic England’s guidance as part of the evolution of the landscape and environment. What matters is whether such change is natural, harmful or beneficial to the significance of an asset.

With regards to changes in setting, GPA 3 states that*protection of the setting of heritage assets need not prevent change,* with the above statement regarding the type of impact on the significance being key.

The following assessment is limited to considering the effects occasioned upon the setting of the heritage assets by the proposed changes to the scheme.

* ICOMOS (January 2011) Guidance on Heritage Impact Assessments for Cultural World Heritage Properties.

Impact upon the Heritage Assets

Houses on Church Road

The character and the context of the immediate site environs will experience no change due to the proposed addition of PV panels. The size, form and shape of the proposed buildings remain as Consented.

In reality, the three southern most units will be the most visible to Church Street, and only then through the trees. The other plots generally face into the site and are shielded by other buildings. Therefore the visual impact is very slight.

	Heritage Value of immediate setting	Level of Change compared to previous scheme	Change in Overall Impact upon setting
Listed buildings on Church Road	Medium	Negligible	Neutral/Slight

Overall the setting of the listed houses on Church Road is considered to have a **Medium** heritage value. The overall impact due to the change is considered, on balance, to be **neutral**. This is a balanced view taking into account the positive benefits to the environment and to the occupiers of the properties.

Houses on Wellington Road

The proposed changes are not visible from the east (the Wellington Road area).

The Conservation Area

The front range retains the open green space and the bank of trees, enhancing the setting overall.

The effect upon the conservation area is limited to any visual intrusion, as there are no changes to the shape, size or form of the proposed buildings.

The PV panels are an integrated type, flush with the roof finish, which limits the visual intrusion. On the darker roofing materials, the colour contrast is slight and the panels tend to blend in without being noticed.

The increasing commonplace nature of PV's on buildings and the knowledge that they offer a viable contribution to the energy requirements of a property serve to make the panels more attractive to the user and to the observer.

	Heritage Value of immediate setting	Level of Change compared to previous scheme	Change in Overall Impact upon setting
Conservation Area	Medium	Negligible	Neutral/Slight

Overall the setting of this part of the Conservation Area is considered to have a **Medium** heritage value. The overall impact due to the change considered, on balance, to be **neutral**. This is a balanced view taking into account the positive benefits to the environment and to the occupiers of the properties.

8.0 Conclusion

The Planning Regulations state that PV panels will not be permitted upon walls which face the Highway in a CA. It does not mention roofs facing the CA. Therefore the proposal could be deemed acceptable in principle, subject to the impact upon the heritage assets.

PV panels mounted on roofs are becoming very much more commonplace and with that trend comes the increasing acceptance of any visual intrusion that they may make. In effect they are no longer noticed. This is helped by the improvements in design which allow them to be mounted flush with the roof finish. In this scheme, the panels are also somewhat shielded from the view from Church Street and the historic area to the south of the site, by the trees and the physical positioning of the plots some way back from the road.

Until such time that they become ubiquitous, a balance has to be struck between any perceived visual intrusion and the benefits that they bring to the environment and to the users/owners of the buildings upon which they sit. This change in acceptability is carried through to projects where PV panels are being permitted on listed buildings. Indeed, the Royal Borough of Kensington and Chelsea no longer require Listed Building Consent to be obtained for placing panels on grade II and some grade II* buildings.

There is a Historic England Advice Note on *Climate Change and Historic Building Adaptation* (November 2023) which is currently in draft form for consultation, but it positively encourages the use of renewable technologies and in para 31 it notes '*When applications for changes to a building in response to climate change are assessed, a balance will have to be made between the significance of the heritage asset and the public benefits (that is positive climate action) provided by the proposal.* This acknowledges that positive climate action is a public benefit.

In the NPPF paragraph 197 it states that, in determining planning applications, local planning authorities should take account of;

- *the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality;*

This report has analysed the factors which will be occasioned by the change in the proposal and has determined that generally a negligible change will be occasioned to the historic setting, resulting in a neutral impact. The addition of the panels results in a broadly beneficial outcome.

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