

**Revisions to the adopted Ipswich Local List (Buildings of Townscape Interest) Supplementary Planning Document (SPD) – Consultation statement July 2016**

**Consultation on proposed additions to the Local List, November 2015**

On 5<sup>th</sup> November 2015 letters were sent to the owners of all the buildings proposed for addition to the Local List, informing them of the inclusion of their property on the Local List. One response was received and it is summarised below.

Respondent	Summary of comment(s)	IBC Response
Private Individual	Support the addition of Hill House to the Local List.	This is welcomed.

**Consultation on proposed additions and revisions to the Local List, January to March 2016**

Proposed additions and revisions to the adopted Local List SPD were published for full public consultation between 29<sup>th</sup> January and 7<sup>th</sup> March 2016. Two responses were received and they are summarised below.

Respondent	Summary of comment(s)	IBC Response
Historic England	No objection to the inclusion of the additional locally listed non-designated heritage assets.  In producing the list entry details Historic England would recommend that the Council considers reference to the aesthetic, evidential, social and communal heritage values within the Historic England Conservation Principles.	Note the reference to the Historic England Conservation Principles document, which has been guidance since 2008 and which the Council is aware of in undertaking its activities.
Natural England	Confirm that they have no comments.	The confirmation is welcomed.

**Previous consultation on the adopted Local List (Buildings of Townscape Interest) SPD (September 2013)**

A call for ideas on the scope and content of the Local List (Buildings of Townscape Interest) SPD was issued through the Local Development Framework Newsletter Number 4 dated March 2011, which was posted to everyone on the Local Plan mailing list and published on the Council's website.

Subsequently a letter was sent in December 2011 to all owners/occupiers of the properties on the draft list stating that their building was being considered and asking for comments. A list of the selection criteria was sent with the letter.

Out of over 200 letters the Council received a total of 20 replies, 16 expressing a wish not to be placed on the Local List and four who were happy to be on the list.

Following receipt of the responses, the Assessment Panel was reconvened to give further consideration to the requests for removal from the Local List. As a result of this process one

property was removed from the list, however, the others were still felt to meet the criteria and were included on the draft list.

The table below summarises the comments received and the Council's response.

<b>Responses received requesting removal from the draft Local List</b>	<b>Response</b>
The building did not meet the selection criteria	It has been made clear that properties need to meet one or more of the nine selection criteria provided that the building or structure's historic form and qualities have not been seriously eroded by unsympathetic alteration. All the selected properties meet at least one of the selection criteria and the general proviso.
An architect of note did not design the building	A number of properties have been added to the list following analysis of the Dictionary of Suffolk Architects 1800-1914. The buildings designed by architects included in the list are architects of local note, some are of regional note and others are nationally known.
The building had been substantially altered	All the buildings on the draft list meet one or more of the selection criteria and have been chosen because of their relatively unaltered state.
Concern that changes would not be able to be made to the building in the future as a result of being locally listed.	Local listing is not a statutory designation unlike "Listing" as undertaken by the Secretary of State and existing permitted development rights are not affected.
That inclusion on the list would significantly hinder future proposals for regeneration of an area. In addition as they were not included in the 1984 list they were not considered to be of sufficient architectural merit or local townscape interest to warrant retention.	<p>The Local List is not a statutory designation and the Local Authority has no additional powers to retain an unlisted building outside of a Conservation Area. Core Strategy Policy DM8 states a presumption in favour of retention and repair of locally listed buildings and emphasises the need for any replacement to be of equal or better design. This does not preclude new development but places a clear focus on achieving a high standard of design.</p> <p>The fact that some buildings were not included in the original 1984 list does not preclude their local interest and character as many buildings were missed especially 20<sup>th</sup> Century buildings. In addition, due to the list being a voluntary effort there was no mechanism for periodic review.</p>

A revised draft of the Local List SPD was prepared in July 2012 (approved by Executive 24<sup>th</sup> July 2012) and was subject to public consultation for six weeks in August to October 2012. In response to representations received, and following discussion with the Portfolio Holder, officers further revised the Local List SPD (the 'Local List') to make clearer the impact on owners of being on the Local List and included a justification for each building and structure.

The table below summarises the comments received and the Council's response.

<b>August – October 2012 Responses received</b>	<b>Response</b>
The building did not meet the selection criteria	It has been made clear that properties need to meet one or more of the nine selection criteria provided that the building or structure's historic form and qualities have not been seriously eroded by unsympathetic alteration. All the selected properties meet at least one of the selection criteria and the general proviso.
The SPD does not include a justification for each building or structure.	This has been recognised as an issue in all the representations and as a result each building or structure now has a description outlining its significance.
Nominations for the Local List were not examined by an independent Panel.	The Conservation and Urban Design Service set up a panel of both external and internal members including local architects, surveyors, members of the Ipswich Society and Councillors and Planning Officers to assess the draft long list against the selection criteria.
That the SPD had not been subject to a sustainability report.	<p>It falls to the Local Planning Authority to determine whether Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA) is needed i.e. whether there are likely to be significant environmental effects. The Local List SPD relates to a higher level policy (in the Core Strategy) which has been subject to a SA, and it does not introduce new policy. As a topic based SPD (as opposed to an areas based SPD for example) it is unlikely to have significant environmental effects and anyway these would have been picked up through the SA of the policy.</p> <p>In the case of this SPD, it is considered that SA/SEA is not required.</p>
Conflicts with Core Strategy Policy CS19 and CS9 and is inconsistent with DM9	<p>A detailed site allocation for an alternative use on 12.57ha of the site at St Clement's will be made in the Site Allocations and Policies document as stated in the policy, and in the supporting text the strategic housing land availability assessment identified the site would be appropriate for approximately 350 homes. The Local List (Buildings of Townscape Interest) merely seeks to preserve those elements of the site that can be incorporated effectively into a residential redevelopment of the site. This would therefore meet the housing delivery objectives within policy CS7.</p> <p>Policy DM9 states that there is a presumption</p>

	in favour of retaining and repairing buildings of local townscape interest. Proposals involving the loss of such buildings will only be permitted if it can be demonstrated by thorough analysis in the Design and Access Statement that the replacement building(s) is of an equal or higher standard of design and incorporates sustainability features. The presumption to 'not normally grant' proposals for the demolition of locally listed buildings is consistent with the presumption in favour of retaining and repairing buildings of local townscape interest.
The Local List lacks clarity in relation to large sites without any accompanying maps.	This comment relates to a complex site which is to be redeveloped involving selective demolition of certain buildings. It has been recognised that in this instance a map outlining the buildings which are included on the Local List would add clarity.
Residents are not clear what impact inclusion on the Local List will have on property owners and property values.	The information on the impact on owners has been expanded in the introduction of the SPD. The Council is unable to determine whether inclusion on the list will have an impact on property values.
Errors had been found in the list.	Officers have gone through the list and have found some errors which have been rectified.

The representations were responded to in full and, as a result, Officers made amendments to the Local List and consulted on the draft Local List for a further four week period from 15<sup>th</sup> February to 14<sup>th</sup> March 2013. A summary of the representations and responses is set out below.

<b>February – March 2013 Responses received</b>	<b>Response</b>
The description does not provide any analysis or explanation as to why the building is considered suitable for the Local List and does not describe in detail which parts of the building are to be included.	It has been recognised that in this case the description was lacking in clarity and this has been amended accordingly.
The numbering provided in the Local List is unclear.	The numbering was not correct and has been amended on the final draft.
One of the buildings included on the list has been too altered to make it a candidate for the Local List.	It has been made clear that properties need to meet one or more of the nine selection criteria provided that the building or structure's historic form and qualities have not been seriously eroded by unsympathetic alteration. All the selected properties meet at least one of the selection criteria and the general proviso.
A request was made for a plan of the site outlining which parts of the buildings were being identified as included on the Local List.	A plan has been prepared and was sent as part of the reply for comment.
That the Local Listing of these buildings will render unviable or seriously	Local Listing is not a statutory designation. The Council has had within the 1997 Local

frustrate any redevelopment proposals for the site.	Plan and the current Core Strategy (2011) a policy relating to the retention and repair of Buildings of Townscape Interest. This does not preclude redevelopment but puts the onus on the developer to demonstrate that any replacement buildings are of an equal or higher standard of design.
The SPD is not consistent with the wording of Policy DM9.	The wording within the Local List SPD has been amended to be in line with the wording of Policy DM9.
The consultation document did not include a map of the parts of the site to be included in the Local List.	This map had been previously agreed and will be part of the final SPD document.
The description made reference to a part of the building which is to be removed under redevelopment.	The description has been reworded to remove reference to this part of the building.
The description does not identify which of the selection criteria relate to the building or provide a reasoned justification.	The description has been further expanded to include an analysis of the significance of the site and which of the selection criteria it meets.
Inclusion on the Local List is an unnecessary control of development.	Local Listing is not a statutory designation and the owners permitted development rights are not affected.
Inclusion may affect development proposals	Development proposals which fall outside of permitted development rights will be looked at in the light of the character of the building and context. A recent extension has been approved and being on the draft Local List did not hinder this proposal.
The building is not of sufficient character to be worthy of retention, the quality of the fabric and materials are not outstanding and the setting of the building is not special.	It has been made clear that properties need to meet one or more of the nine selection criteria provided that the building or structure's historic form and qualities have not been seriously eroded by unsympathetic alteration. All the selected properties meet at least one of the selection criteria and the general proviso.
The property does not meet the selection criteria and the process was not satisfactory.	A full reply was written which outlined the purpose of the Local List, why the property was included and the process undertaken to ensure that the public were informed at all stages.  A further meeting of the selection panel was held to assess the properties in light of the objection made. Having made a further site visit and assessment it was decided by the Panel that the property is removed from the draft Local List.
Asking for inclusion of a property to the Local List.	Additions to the Local List will be assessed annually and the Council will inform owners in writing of their decision.
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The SPD must be considered within the review of the Core Strategy. SOCS support the thrust of the SPD.	-
No comments (Highways Agency).	-

Having responded to the representations made, the draft Local List was finalised for consideration by Executive Committee and it was adopted by the Council on 18<sup>th</sup> September 2013.