

**Local List (Buildings of Townscape Interest)
Supplementary Planning Document
Consultation Statement
September 2013**

Following revisions made to the draft Local List in response to representations made, Ipswich Borough Council undertook a further period of public consultation for a four week period in February and March 2013. The Council received four letters of representation objecting to the inclusion on the draft Local List. A brief summary of the issues are as follows:

Name of respondent	Responses received requesting removal from the draft Local List	Response
East of England Co-operative society	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 frustrate any redevelopment proposals for the site.	Local Listing is not a statutory designation. The Council has had within the 1997 Local 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.
Norfolk and Suffolk NHS Foundation Trust	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.
SEH Developments	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.

Mr J Mason	The property does 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.
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Ipswich Borough Council undertook a public consultation on the draft Local List (Buildings of Townscape Interest) for a six week period in September and October 2012. The Council received 13 letters of representation objecting to inclusion on the Local List from owners. A brief summary of the issues are as follows:

Respondee	Responses received requesting removal from the draft Local List	Response
St Clement's Congregational Church, Linda S Russell, Mr J Mason,	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.
Norfolk and Suffolk NHS Foundation Trust,	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.
Linda S Russell.	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.
Norfolk and Suffolk NHS Foundation Trust	That the SPD had not been subject to a sustainability report.	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

		<p>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>
<p>Norfolk and Suffolk NHS Foundation Trust.</p>	<p>Conflicts with Core Strategy Policy CS19 and CS9 and is inconsistent with DM9.</p>	<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 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.</p>

Norfolk and Suffolk NHS Foundation Trust.	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.
Mr and Mrs Jackson Mr and Mrs Skeates Mr and Mrs Brookes Mr and Mrs Skirrow Mr and Mrs Crane S Barnes Mr and Mrs Norman Mr and Mrs Hawes S O'Donnell R Allen and E Pope	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.
Mr and Mrs Jackson Mr and Mrs Skeates Mr and Mrs Brookes Mr and Mrs Skirrow Mr and Mrs Crane S Barnes Mr and Mrs Norman Mr and Mrs Hawes S O'Donnell R Allen and E Pope	Errors had been found in the list.	Officers have gone through the list and have found some errors which have been rectified.
Mr and Mrs Jackson Mr and Mrs Skeates Mr and Mrs Brookes Mr and Mrs Skirrow Mr and Mrs Crane S Barnes Mr and Mrs Norman Mr and Mrs Hawes S O'Donnell R Allen and E Pope	Questions as to why some properties were included and yet other seemingly identical ones were not on the List.	It was explained that the Suffolk Dictionary of Architects is a good starting point for a study of local architects and their work. However it is not exhaustive and in some cases it has not been possible to identify individual houses ascribed to an architect. The intention is that with the publication of the Local List that if individuals have knowledge of a building that they feel should be included that they contact the Council who will consider new entries.

As part of an initial consultation process on the Council's Local List supplementary planning document (SPD), a letter was sent 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 we had a total of 20 replies. 16 expressed a wish not to be placed on the Local List and 4 were happy to be on the list. The brief summary of issues below was published in September 2012 and accompanied the public consultation in September and October 2012.

Respondee	Responses received requesting removal from the draft Local List	Response
Mr J Mason Linda S Russell Mr and Mrs Hendry R Nickells Miss A Soderberg Ms J Samant R Watson	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.
R Nickells Miss A Soderberg Mr J Mason	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.
Mr J Mason R Nickells	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.
T Skirrow	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.
Mrs Kenna S Peck R Watson	Inclusion on the list would create a security risk arising from the publication of the list on the Council's website.	The proposed Local List supplementary planning document will be available to view on the Council's website. The format will be colour photographs of each property with a brief description/history. Photographs of statutorily listed buildings are available on the internet on the Images of England website and there has been no correlation between this and a decrease in security of those buildings that the Council is aware of. Nearly all of these buildings are visible from the public highway and therefore are no more at risk than their neighbours.

		<p>The Council has had Conservation Area Appraisals featuring photographs of individual properties on the internet for 5 years and has never been made aware that this has caused a heightened security risk.</p>
<p>East of England Co-operative Society</p>	<p>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>	<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 20th Century buildings. In addition, due to the list being a voluntary effort there was no mechanism for periodic review.</p>