

**St Boisil's Residents' Association
c/o Tower Road
Tweedmouth
TD15 2BD**

Dear Mr Sittambalam

6th September 2017

Planning application 17/02774/FUL

Development: Erection of 3 x 3 storey dwellings at St Aidan's House, Palace Street, Berwick upon Tweed TD15 1HN

I refer to the above planning application and I would like to object to the proposals for the following reasons on behalf of St Boisil's Residents' Association.

The Developer has previously made an application 17/01852/FUL (May 2017) for 3 x 3 storey dwellings on this site. The new application is exactly the same as the previous one in terms of its position, structure, footprint and height. Consequently my initial objections are still relevant.

1. Design, character and appearance.

The proposed three new dwellings are to be sited in the former playground of St Aidan's House within 4.2m from the quay walls a designated ancient monument and separated from the structure by a line of trees that are the subject of a tree preservation order, as well as being within the Conservation Area.

This location is very sensitive and any building must respect the overall character of the historic features and be in scale with those features and the surrounding properties.

In an earlier planning permission 12/00144/FUL for the conversion of the former school building which is St Aidan's House to three dwellings, it was proposed to provide three garages, a workshop and greenhouse on the rear school yard in support of that development. Only part of the roof of that proposed garage building would have been visible when viewed from across the river and when walking along the walls themselves.

That building was to be single storey and sited away from the walls and trees. The Conservation Officer and the County Archaeologist did have some concerns about the relationship and construction. Consequently the redesigned garage block was a timber construction fixed to the existing thick concrete paving slabs. The approach approved was to treat this building as if it were a garden outbuilding with no need for any foundations.

The current proposals are for a much more substantial building in a similar location but this would now be three storeys in height (approximate overall height over 10m) The form of the development would be an uninterrupted

mass of building that would tower over the walls and be completely dominant and overpowering in views into and out of the 3 Conservation Areas of Berwick, Tweedmouth and Spittal.

At present St. Aidan's School House and the two neighbouring properties to the east step back away from the fortifications, widening the vista from the footpath on the walls. The proposed building will destroy the visual enjoyment of walking the Walls. The setting at this situation will be marred and by its overwhelmingly massive, blank gable ends which will interfere with the views, especially when walking the walls clockwise.

The building would be designed to have major areas of fenestration and Juliet balconies over the first and second floors looking out over the river. The materials used would be random stone with Art-stone quoins, sills, lintels and jams under a slated roof. The mass of building, its material form and lots of glass would introduce an alien and inappropriate feature to the historic landscape at this point which would harm the setting and character of the walls themselves.

Whereas the proposed garage block was designed so that no foundations were required, in this case the building regulations do require the provision of proper depth of foundations. On the submitted plans the applicant suggests that they would be provided at a depth of 0.75m, but it is my understanding that a deeper foundation is required. However even if the 0.75m depth is acceptable to the building inspector given the concerns expressed previously by the Conservation Officer and the archaeologist a foundation depth of 0.75m will result in invasive and potentially harmful effect on the archaeology of the area. The disturbance that would arise because of the construction would be likely to have a detrimental affect on the foundations of the walls themselves.

It is my view that the proposal is completely unsympathetic in design, character and appearance with the vernacular of the area and given its historic setting.

2. Affect on the conservation area, listed buildings, designated ancient monuments and archaeological features that collectively make up the heritage assets

It is entirely because of inappropriate design, layout, scale and overall approach to the proposals that objection is raised because of the significant harm that will result to the designated and non designated heritage assets.

These designated and non designated heritage assets have been clearly identified by Historic England, North East Office, in their letter of 20 June 2017 to the Council. I support their concerns that *“individually and certainly collectively these heritage assets form a significant group which need to be sensitively and appropriately considered with regards to impact on them by the proposed development to their settings and significance.”*

I note that the applicant has not provided any such assessment but from my consideration of the advice from Historic England as to how to consider heritage aspects I conclude that the impact would be major and disastrous.

I would like to support Val Robson, the Conservation Officer's response to the council, dated 13 July 2017 who states -

*"Building Conservation are also concerned regarding the the appropriateness of **any built form** on this area of open land due to the sensitivity of its location adjacent to important grade 2* listed buildings and the Scheduled Monument (Town Walls) and the current views through to St. Aidans House which would be lost as part of any development".*

3. Loss of tree preservation order trees and overall damage to the appearance of the conservation area

There is a substantial line of trees along the boundary of the site and next to the walls. These have been given protection by being the subject of a tree preservation order and also by being located within the conservation area. (The illustrations show 5 trees, now there are only 3)

The proposed development will threaten the safety and long life of those trees because of the construction of the proposed houses and the nearness of them to those trees both to their root systems and crowns.

The removal of the trees and the substantial pruning will significantly destroy the setting and character of this sensitive part of the conservation area.

4. The lack of details provided contrary to the advice provided in the NPPF

The Design and Access Statement is woefully lacking in information.

It is not accompanied by any properly researched Heritage statement and consequently does not meet the necessary requirements and safeguards that are required to be examined as stated in the NPPF.

It is also noted that in both the previous application 17/01852/FUL and the present application 17/012774/FUL the information given asserts 'that there does not appear to be any archaeological issues but site monitoring will be carried out during excavations of the foundations and trenches'

Nick Best, NCC Conservation Team, Archaeology's response to the council, dated 16th July 2017 *"no assessment of archaeological potential has been undertaken and the application does not identify how the proposal has been informed by the significance of the heritage resource or how impacts to the resource will be mitigated.*

It is clear that the proposed development has potential to impact significant unrecorded features and deposits and to harm the setting and therefor the significance of known heritage assets, including Berwick Town Walls".

In view of these omissions and given the very sensitive nature of the site I urge the Council to refuse the application as being unable to meet the requirements of paragraph 128 of the NPPF.

This development fails to meet the extremely high quality, in terms design, layout and materials, needed to justify a scheme that could enhance and not cause harm to this historic environment. Consequently I would hope it is recommend for refusal.

I would be grateful if you could consider all the points of objections that I have made above and present these objections to the Development Control Committee when they meet to determine the application.

Yours sincerely

Margaret Thomas
Chairman
St Boisil's Residents' Association