

From: Peart, Simon
Sent: 17/07/2012 12:53:04
To: Kirk, Debbie
Subject: FW: Cofferridge Close, Stony Stratford.

Debbie

As you are aware, I attended a meeting of 25th June at Cofferridge Close with the agents for the applicant (from Barton Willmore and CgMs) and English Heritage in order to discuss the current scheme. There was subsequently an email from Kim Morris on 5th July. Both of these were very useful in understanding the background to the current scheme, the interpretation of the site and the proposed design.

The email notes the comments of Paul Affleck (Senior Conservation Officer) who has commented on the scheme previously. As discussed at the meeting, since then, part of the Cofferridge Close scheme, nos. 7-23 Silver Street, has been listed and the National Planning Policy Framework (NPPF) has replaced PPS5. My reading of the English Heritage advice report that considered the designation of Cofferridge Close is that, had the commercial part of the scheme not undergone the previous scheme of alteration, it would have been listed. Falling short of being nationally designated, the report did convey the importance of the scheme, summarising:

'Cofferridge Close does not therefore meet the exacting criteria of intactness that is required to merit statutory listing but is recognised for its strong local interest as an important development in post-war town-planning that integrated the new town of Milton Keynes with the existing market town of Stony Stratford.'

The commercial part of Cofferridge Close is a non-designated heritage asset in its own right, but also forms part of a designated heritage asset (Stony Stratford conservation area) and is within the setting of numerous other designated heritage assets (i.e. nearby listed buildings), including the residential part of the scheme. It is the impact upon these assets that must be considered.

The significance of Cofferridge Close is tied to both the development of Milton Keynes new town and its immediate setting, the historic market town. The process of establishing the lasting contribution made by Milton Keynes new town to planning and architecture is only in its infancy, however, Cofferridge Close is one of the earliest major works of MKDC, and at the time, served as a realisation of the type of architecture to be employed on this scale throughout the new town. Even in the traditional setting of Stony Stratford, with its wealth of historic buildings, the architects for the scheme, Derek Walker and Wayland Tunley, did not shy from the same modern, Miesian principles that underpin the most successful developments of the new town. They did however ensure that the scheme reflected its traditional surroundings, in particular adapting its facing materials, height and bay proportion. Similarly, existing and generous new landscaping achieved a balance between built and natural forms, providing a quiet place to shop and work away from the busy High Street and giving reference to the Orchard which occupied part of the site previously.

Undoubtedly, the most striking feature of the commercial part of the Cofferridge Close scheme are the colonnades, particularly the High Street elevation (although now in mutilated form) and the principal colonnade which runs along the site, perpendicular to High Street. The latter forms a key part of the SE elevation, albeit its simplicity is undermined by the later glass and steel canopy structure. The SE elevation runs for a considerable length, after the colonnade terminates, the repeated bay proportion and rhythm of the building is expressed through the protruding ribs, between which the fenestration is neatly positioned.

The primary, linear range of the building links the High Street end of the scheme with the flats and houses at Silver Street, providing a near continuous frontage which helps to unify the scheme as a whole. Whilst there is a certain strength to the architecture, particularly in the colonnades, the plan form and position of the building within the site creates a series of spaces (the main parking area, the garden/orchard area and servicing area) that compliment the scheme. The main car parking area was initially softened with a generous bank of landscaping and parking spaces set close to trees. Whilst the bank has been compromised by the later alterations, the overall character of car park is an informal one whose intensity does not overpower the leafy character of the site. To the other side of the building are a number of trees which form part of the generous green area, free of car parking and built structures. As referred to in the listing, this area provides an 'extended garden' for some of the properties in Cofferridge Close.

Whilst I am able to appreciate the design team have made real efforts, using non-standard solutions, to limit the impact of the scheme, it appears to me that the size and format of the store required on the site, and the requisite facilities – such as parking and servicing, cause a number of issues.

Firstly, it necessitates the removal of a significant proportion of the commercial part of Cofferridge Close, leaving only what I would estimate to be about 35% of it standing. The result would be two disparate elements of the scheme (Silver St. and High St. ends) which would have a poor visual relationship with each other, instead being isolated. With such a small proportion of the original commercial building remaining (only 4 of the original 15 main colonnade bays would survive) the original, linear emphasis of the scheme would be lost. The surviving element, complete with the later, unfortunate scheme of alterations (these are not to be rectified as part of this scheme) will be token reminder of the design concept of the original

Secondly, the relationship between the new and the old. Whilst the new store would reinstate some frontage along the NE/SW axis it would fail to tie the scheme together in a meaningful fashion, the scheme doesn't pick up the rigid bay proportion and rhythm of the

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remaining building. This would be exacerbated by the proposed step back in frontage at the junction of new and old, where the line of the current colonnade is abruptly truncated in order to accommodate a deeper parking arrangement. Due to the position and footprint of the new building, it would dominate the remaining elements of Cofferridge Close from all but the High Street elevation, imposing itself on the setting.

Thirdly, the impact on the landscaping scheme, which is particular relevance at Cofferridge Close. Whilst a number of trees have been retained, there are a number of mature trees to be removed. I am concerned about the reliance on trees placed within parking spaces to offset the loss of existing trees. In particular, I would note the significant reduction in the depth of the green / orchard area, this will clearly have an impact on the overall character and appearance of the site, particularly given the various pedestrian routes across the site. The wrap-around nature of the proposed car parking will alter the ambience of the current area by creating the feel of a larger single car park. This differs from the current parking which has informal nature to it.

In summary, I am of the view that the current proposal would fail to sustain the significance of the non-designated heritage asset (Cofferridge Close), the significance of the designated heritage asset (Stony Stratford Conservation Area) and the contribution made towards the significance of the designated heritage assets, 7-23 Silver Street, by their setting.

The above comments do not preclude some level of adaptation or removal of the current Cofferridge Close scheme should it be justified. However, in my opinion, the current scheme does not strike the correct balance from a heritage perspective and causes significant harm to both Cofferridge Close and the Stony Stratford conservation area. There may of course be other material factors for you to take into account, I would of course be grateful if you could inform me of any elements of the scheme which deliver public benefit that might outweigh the harm caused, as advised in the NPPF.

Regards

Simon

A selection of NPPF paragraphs of particular relevance.

Foreword:

Our historic environment – buildings, landscapes, towns and villages – can better be cherished if their spirit of place thrives, rather than withers.

Achieving Sustainable Development:

- 7** *an environmental role – contributing to protecting and enhancing our natural, built and historic environment*
- 9** *Pursuing sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment,*
- 60** *Planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles. It is, however, proper to seek to promote or reinforce local distinctiveness.*
- 131** *In determining planning applications, local planning authorities should take account of:*
- *the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
 - *the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and*
 - *the desirability of new development making a positive contribution to local character and distinctiveness*

The NPPF says for non-designated heritage assets:

- 135** *The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that affect directly or indirectly non designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.*

For designated heritage assets:

- 132** *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. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification*
- 133.** *Where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:*
- *the nature of the heritage asset prevents all reasonable uses of the site; and*
 - *no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation;*

and

- *conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and*
- *the harm or loss is outweighed by the benefit of bringing the site back into use.*

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