

TOWN AND COUNTRY PLANING ACT 1990
TOWN AND COUNTRY PLANNING (INQUIRIES PROCEDURE)

RULES 2000

TOWN AND COUNTRY PLANNING APPEALS (DETERMINATION BY INSPECTORS)
(INQUIRIES PROCEDURES) (ENGLAND) RULES 2000

**REPRESENTATION FROM INTERESTED PARTIES OPPOSED TO
THE APPEAL – OWNERS OF 7-13 & 23 SILVER STREET**

Mr. Terence Cook, Ms Angela Cook, Dr. Michael Saward, Ms Sarah Driver, Ms Amanda Farr,
Dr. Annabelle Dytham, Mr. Richard Crabbe

(Contact: Ms Angela Cook, 7 Silver St, Stony Stratford, MK11 1JS)

**THE PARTIAL DEMOLITION OF THE EXISTING BUILDINGS AT COFFERIDGE CLOSE
AND THE CONSTRUCTION OF A NEW FOOD STORE WITH THE RECONFIGURATION
OF THE CAR PARKING (AMENDED DESCRIPTION, AMENDED PLANS AND AMENDED
SUPPORTING INFORMATION).**

AT

PROPERTIES AT COFFERIDGE CLOSE, STONY STRATFORD

Planning Inspectorate reference: APP/Y0435/A/13/2205359

Council Reference: 11/00143/FUL

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– OWNERS OF 7-13 & 23 SILVER STREET

23 NOVEMBER 2013

The following is a joint submission by the owners of the five town houses 7, 9, 11, 13 and 23 Silver Street. The houses together with the four apartments and entrance archway are the listed residential element of the present Cofferridge Close scheme. We object to planning proposal 11/00143/FUL and agree with Milton Keynes Council's grounds for refusal due to the harm caused to the significance of the designated heritage asset 7 – 23 Silver Street and the entrance archway and the detrimental impact on the residential amenity of the listed building arising from an overdevelopment of the site.

1.Cofferridge Close

1.1 Cofferridge Close is a mixed use development comprising small scale retail, offices, community and residential elements within a carefully designed landscape referencing historic uses of the Close. Cofferridge Close sits in the heart of the Stony Stratford conservation area.

1.2 Cofferridge Close is significant in the history of the new city of Milton Keynes being the first major development by the newly formed Milton Keynes Development Corporation (MKDC). The scheme served as an early example of the architectural style to be employed at this scale throughout the most successful developments of the new town. Cofferridge Close was designed and built between 1970-1976 under MKDC's then chief architect Derek Walker and project architect Wayland Tunley.

1.3 In relation to scale and use of materials care was taken to integrate the modern development into the fabric of historic Stony Stratford. A rich 'wrap-around' landscape design introduced new planting but also retained some existing mature trees, part of a town orchard and an area of open green space.

1.4 The landscaping softened the bold built form, separated pedestrians from car parking areas and provided an extended garden for the people living in the town houses and apartments comprising the residential element of the scheme. Careful consideration of setting is judged to be an important element in successful post war design.

1.5 The Cofferridge Close scheme (but not including the private residential element which was assessed separately) was assessed for listing by English Heritage (EH) in May 2012 but was not added to the statutory list due to the unsympathetic alterations that have occurred over the years.

1.6 Nevertheless the EH assessment was clear that had it not been for the alterations it would have been statutorily listed. EH recognised Cofferridge Close for its high quality architecture, strong local interest and historic significance 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.

1.7 Commenting on the significance of the Cofferridge Close scheme in the history of Milton Keynes the Conservation and Archaeology Manager for Milton Keynes Council has said 'the process of

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establishing the lasting contribution made by Milton Keynes new town planning and architecture is only just beginning.'

2. The town houses and apartments 7-23 Silver Street and the entrance archway.

2.1 The houses, apartments and entrance archway are the residential element of the Cofferridge Close scheme and an integral part of the development. 7-23 Silver Street including the archway was listed Grade II by English Heritage in May 2012. The building is only the second in modern Milton Keynes to be added to the statutory list the first being the Central Milton Keynes shopping building.

2.2 The five town houses, four apartments and entrance archway front onto Silver Street and form the southern boundary of the MKDC scheme. The listed archway is the sole vehicular access into Cofferridge Close.

2.3 The listed building 7-23 Silver Street relies on the rest of the originally executed scheme, its architecture, landscape, massing, design and materials, to reinforce context and significance as a designated heritage asset. Listed building guidance states that 'setting' can extend much further than the 'curtilage' of the building and can include landscapes, street scenes and layouts that are part of its context plus views to and from it. English Heritage recommends when assessing the implication of development affecting 'setting':

'Assess whether, how and to what degree these settings make a contribution to the significance of the heritage asset. (English Heritage- The setting of Heritage Assets- June 2012 p.15 4.1).

2.4 The three storey houses and the apartments have a rear aspect into Cofferridge Close where the visual link with the rest of the built form and the landscape is boldly made. The view of the southern end wall of the office block is softened with espaliered pear trees. The rear view from the main middle floor living space in the town houses is through floor to ceiling sliding glass doors leading to full width balconies. The main living space has an intentional inside/outside feel dependent on the open aspect of the Close with its area of green space, orchard and other trees, raised bund and planting.

2.5 In its original design all residencies enjoyed a rear view over a rich landscape design. The view over the retained orchard and open green space is largely unaltered. Loss of a significant portion of the raised bund running alongside the south west elevation of the office block together with loss of the pergolas and other planting has been particularly detrimental to the rear views from the apartments and no. 23 Silver Street. However the retained element of the bund ensures that the design intent of the original landscape remains legible.

2.6 In the listing decision EH linked 7-23 Silver Street with the tradition of housing set by Span in Greenwich in the 1950s. Although a smaller scale project EH judged 7-23 Silver Street to be equally successful in civic and context terms as other listed schemes of the same era and tradition such as

the Alexandra Road (Grade II*), Branch Hill and Duboyne estates (both Grade II) built by the London Borough of Camden in the 1970s under Neave Brown. As in the case of Cofferridge Close landscape design was an important component of comparable projects of the same era highlighted by EH in their listing decision.

3. Objection on grounds of harm to the significance of 7-23 Silver Street and detrimental impact on amenity.

3.1 The appellant's proposal would demolish a very large proportion of the built element of the Cofferridge Close scheme as well as 70% of the green space. 1000 square metres of green space at the heart of the scheme would be taken out leaving only a residual piece between the new store and the car parking area. The historic orchard carefully retained in the MKDC development would be destroyed as well as a large number and variety of mature trees and the remaining areas of the raised bund along the south east facade of the office building.

3.2 The value of this green space was recognised when the planning committee rejected a planning application by a previous owner to turn much of the orchard into car parking (application numbers MK/401/95 and MK/402/95). Other alterations within these applications were permitted but after visiting the Close committee members decided that additional parking was not acceptable on the area of open green space and trees. The residents of the town houses submitted objections to this planning application at the time of public consultation.

3.3 The proposed development would therefore remove most of the carefully designed context both architecture and landscape that are the 'setting' of 7-23 Silver Street and the context in which the building is appreciated and understood as a designated heritage asset.

3.4 The built elements of the original scheme that would remain (7-23 Silver Street and the office and retail units fronting onto and directly behind the High Street) are left as isolated remnants with a poor visual link in the form of the retained section of the colonnade running back from the High Street.

3.5 The proposed redevelopment would introduce eight short stay (2 hrs) parking spaces along the tree line directly behind numbers 7 to 13 Silver Street and eight further parking spaces beyond the trees towards the service delivery area. Currently there is no parking directly behind the houses and the long stay parking closest to the properties is tucked out of view for a distance so that parked cars are not directly in view when looking towards the open green area from the main living room. The parking spaces along the edge of the orchard area were introduced in 1995 by a previous owner. The house deeds for 7-23 Silver Street stipulate no parking along the edge of this green space the clear intent being to give an uninterrupted view over the green space, orchard and built form from the middle floor main living room.

3.6 The proposal to site new parking directly behind the town houses shows little consideration for the residential amenity or privacy of people whose main living space and balcony face directly out over the Close.

3.7 As residents of the town houses we strongly disagree with the statement in the appellant's grounds of appeal that the disturbance in Cofferridge Close arising from the proposed development would be comparable to what we experience at present. Currently long stay parking spaces are located on the orchard side of the Close which reduces traffic movement behind 7-13 Silver Street and the apartments. Traffic conditions in the Close reduce to that of a quiet residential street after 6 p.m. on weekdays and from 4 p.m. on Saturday until Monday morning. In the evenings and at weekends Cofferridge Close has an air of tranquillity which may surprise those who only experience the space at busier times of the day.

3.8 In contrast to current traffic conditions the development proposes an increase in parking provision and short stay parking (2 hrs) for all cars in the Close seven days a week. Parking spaces on the orchard side of the Close would be sited directly behind the listed houses. The demolition of the long, linear office building and the setting back of the new store would expose much of the rest of the car park to the residential building. Store opening times are likely to be at least from 8 a.m. until 8 p.m. Monday to Saturday and 10 a.m. until 4 p.m. on Sunday. Articulated lorry deliveries increase from two to eight a day. Lorries will be routed from the north end of the High Street along Church Street, Market Square and Silver Street. The residents of the houses and apartments will therefore experience up to sixteen articulated lorry movements a day at both back and front of their properties. In comparing present traffic conditions within the Close with what is proposed account should also be taken of an increase in number of refuse lorries, vehicle deliveries from the supermarket's independent suppliers, home delivery vehicles and supermarket trolleys.

3.9 We are concerned about the increased likelihood of damage to the brick pillars of the listed archway from increased numbers of articulated lorries entering and leaving Cofferridge Close. The damage from scrapes and hits to the pillars is evident; more extensive damage that has occurred has been repaired. Significant 'hits' can be felt and heard across the whole building and the experience of being at home when this happens is alarming. We question whether a listed structure should be subject to the increased likelihood of this kind of damage occurring.

3.10 The aim of the landscaping proposed for the redevelopment is primarily to soften the car park and service area although an attempt is made to recall some elements of what would be removed. Even in its current somewhat altered state the present landscape is a pleasant, legible, designed component of the 1970's scheme and possess a quality that would not be matched by a much reduced landscape and fairly standard trees planted between parking spaces, albeit that some would be 'flagship' specimens. The loss of amenity for the residential element of the current scheme would be very considerable.

4. Conclusion

4.1 The proposed supermarket development would result in considerable harm to the setting of the listed building 7-23 Silver Street because it would remove a large proportion of the original scheme which is the context in which the significance of the designated heritage asset is fully understood and appreciated both by those living in the properties and those viewing them from outside. The MKDC scheme was a bold modern intervention in a historic market town and the level of demolition proposed would rob 7-23 Silver Street of most of its meaningful context. The proposal is detrimental to the character and appearance of the designated heritage asset 7-23 Silver Street and the entrance arch.

4.2 The setting of a listed building encompasses views both to and from it and we question the appellant's assessment of the setting of 7-23 Silver Street which focuses very much on the 'quality' of view from the individual properties, the detrimental effect on these views from alterations to the original scheme and the relevance to setting of the colonnade running back from the High Street. The appellant's case is that the degradations over time have been sufficiently detrimental to the setting of the listed building to justify the level of demolition proposed and replacement with a development which it is alleged will enhance the setting of the heritage asset. We contend that the alterations to the original scheme are relatively minor and reversible, that the integrity and legibility of the original scheme remains intact and that the appellant's proposal would cause significant harm to the setting of the listed building and would not be an enhancement.

4.3 In relation to 7-23 Silver Street the issue of the cumulative impact on setting of alterations over time is relevant particularly as the building is recently listed. English Heritage guidance makes the following recommendation:

'Where the impacts of proposals for successive developments (or a proposal that may generate an additional cumulative impact) affecting the setting of a heritage asset are considered to be potentially detrimental to its significance, assessment of their overall, as well as individual, impact is appropriate. (English Heritage- The Setting of Heritage Assets- June 2012 4.5 p.25)

No such assessment has been carried out in relation to 7-23 Silver Street and the entrance arch.

4.3 We agree with Milton Keynes Council that the proposal is contrary to policies HE5 and HE6 of the Milton Keynes Local Plan 2001-2011, Policy CS19 (previously CS20) of the Core Strategy (adopted 10th July 2013) and paragraphs 134 and 135 of the National Planning Policy Framework.

For reasons of loss of setting to the detriment of the character, appearance and significance of a listed building of national interest and on grounds of loss of residential amenity we respectfully request the Inspector to dismiss this appeal.