Consultancy Unit Appendix A

South Cambridgeshire District Council

Consultation Response Form

☑ **THIS CONSULTATION IS NOW COMPLETE**

Reference Number:	S/3063/18/FL S/3072/18/FL
Proposal:	External Wall Insulation (revised)
Site Address:	16 Princes Close, Balsham 15 Princes Close, Balsham
Case Officer:	AS
Comments due:	

☐ **Urban Design**

☐ **Landscape**

☑ **Historic Buildings**

☐ **Ecology**

☐ **Environmental Sustainability**

☐ **Trees**

Urban Design

Landscape

Historic Buildings

I object to the proposals, which will result in harm to the significance of these Swedish Houses as non-designated heritage assets and will be of detriment to South Cambridgeshire's historic environment. However, if the Planning Officer is minded to recommend approval, it must be for insulation with the external appearance proposed 'to match existing', which has at least the potential to mitigate the harm to a limited extent.

Proposals to clad Swedish Houses with EWI have received objections across the country and have been withdrawn in other districts. Objections to applications in this district have been received from the Twentieth Century Society, as well as local residents, and Swedish House experts. The Twentieth Century Society is a National Amenity Society which campaigns for the preservation of 20th century architectural heritage, and infrequently comments on applications of this small scale, especially where they were not consulted but approached SCDC of their own volition.

South Cambridgeshire's Local Plan Policy NH/15 states that energy efficiency measures should adequately safeguard heritage significance. Policy NH/14 emphasises the importance of sustaining the special character and distinctiveness of the district's historic environment, and states that development proposals will be supported when they sustain and enhance the significance of heritage assets, **particularly non-designated heritage assets** (NH/14(2)d). The NPPF further emphasises the importance of non-designated heritage assets, and NPPF 197 requires effect on the significance of a non-designated heritage asset to be taken into account in determining an application, requiring a balanced judgement having regard to the scale of harm and the significance of the asset.

Significance is defined as *the value of a heritage asset to this and future generations because of its heritage interest.*

Swedish timber houses ('Swedish Houses') were part of a Government programme that brought 2,444 prefabricated houses to Britain between 1945 – 51, to help combat the housing shortage. Swedish Houses are an early and innovative type of affordable, sustainable, all-timber, prefabricated (or 'flat pack') housing for ordinary people in rural areas. They have architectural and social value. They are exceptional in terms of their innovative Scandinavian design and are described by Historic England as '*significant physical records of the social and economic history of this country immediately after World War II.'* The major contributing factor to their heritage value lies in their distinctive exterior appearance which allows them to be recognised as Swedish Houses. Only a finite number of these important post-war houses survive. Throughout the country they are fast disappearing and changing. South Cambridgeshire has some excellent examples, many in Council ownership.

Initially it was proposed that the EWI would have a 'render' finish. This would have eliminated the character of the buildings resulting in almost total loss of significance, as it has done where EWI has been applied before the value of the Swedish Houses was recognised. As an attached photograph shows, it is not simply the vertical tongue and groove boarding which informs the character of the building and allow it to be recognised, but also the roof detailing, doors and windows, etc.

The current proposal is a bespoke EWI construction which will apparently exactly replicate the tongue and groove boarding. Although the proposed cladding is preferable to the previously proposed cream render it introduces new fabric to the building and replaces the existing cladding with heavy, bulky external layers, the depth of which will be all too apparent where they will hover over the plinth. The detailing, as described above, even if done perfectly, will still comprise replacement fabric, and will have a larger, bulkier appearance than existing. The significance of the buildings will not be *sustained*, even though the houses may remain recognisable as Swedish Houses.

The detailing around the EWI (external wall insulation) should be agreed by condition. The installation of EWI does not just entail replacing the existing cladding. The depth of the EWI is such that the form of the house will change, as will the detailing. The roof will need to be extended at least 120mm to cover the depth of the EWI. Bargeboard and soffit details will be lost if not accurately replicated, characteristic window surrounds and door surround details lost if not accurately replicated; the profile of the cladding, and its application in single storey lengths resulting in overlapping bands to the gables, will be lost if not accurately replicated. Some of these details are proposed to be 'as existing', but not all, and no detailed drawings of these crucial elements have been provided. Indeed no drawings of the external face of the cladding itself have been provided in order to have something against which to judge if the proposed cladding is in fact 'as existing'.

It is for the Case Officer to come to a balanced judgement, considering the scale of harm and the significance of the asset. Should the Officer recommend approval, it is requested that the agreement of details is made a condition of any approval.

Only an objection on the basis of harm to the significance of the building can be considered by the Planning Officer in coming to a balanced judgement under NPPF 197. Nevertheless, I believe that there are measures which could be undertaken for comparable or lower cost with a greater impact on the energy efficiency and EPC rating of these properties which would not compromise their significance. I also have concerns about the appropriate use of EWI, as the original specification submitted with the applications was for a brick substrate, and it is only assumed that the bespoke design now arrived at has taken the performance of a timber building into account. Successful EWI for timber framed properties may require specialist products, design, and application, to account for factors such as control of moisture, high levels of movement, and differences in thermal performance. It is also not clear if known issues with EWI have been considered or addressed, including overheating, introduced damp problems and on some occasions poor air quality for residents.
I understand that the above cannot be taken into account as a planning consideration, and simply note that neither a holistic approach to improving energy efficiency, nor the potential for long term harm appears to have been considered.

C Wignall
22/07/2019

Ecology

Environmental Sustainability

Trees