

Objection to new Maltings application 25/00792/CCD: Part demolition, alterations and extension to existing theatre and other ancillary works

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SUMMARY

I strongly object to this proposal. It will cause substantial harm to the conservation area and the setting of the exceptional listed buildings that form part of the town.

1. It is my assertion that this project fails to align with the National Planning Policy Framework (NPPF) and the Northumberland Local Plan (NLP) and poses a significant threat to the town's historic character.
2. I find fault with the design – a lofty, contemporary building featuring flat roofs, modern materials, and prominent branding – as incompatible with the historic roofscape and key views, such as those involving the Grade I listed Town Hall spire.
3. I challenge the subjective claim that “high-quality modern design” is sufficient mitigation for the aesthetic harm caused.
4. I question the touted public benefits, such as job creation and visitor projections, for lacking robust evidence.
5. I condemn the consultation process as inadequate, with only a few percent of residents engaged.

Ultimately, I believe that this development prioritizes branding and convenience over Berwick's heritage, failing to mitigate harm let alone enhance the conservation area.

1. HERITAGE IMPACT: THREAT TO HISTORIC CHARACTER

* The NPPF demands that: “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 (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance” (paragraph 199). Yet the Heritage Statement accompanying the proposal admits: **“The result will be a taller, more contemporary building in the conservation area in entirely different materiality” and “All views towards the building will change.”** These irrevocable changes threaten the much-loved views and the setting of key heritage assets such as the Grade I listed Town Hall spire and the Old Bridge, which is a scheduled monument.

* The statement further acknowledges: **“The most sensitive elements of the conservation area which will experience change as a result of the proposed development are key views towards Berwick when approaching from the south.** Views from Old Berwick Bridge, from the Royal Tweed Bridge and from Union Brae, Tweedmouth (view 0143) provide panoramic views across Berwick's dense roofscape.” It points out that the existing Maltings building preserves these views with its similar height, clay pantiles, and pitched roof broken into sections, reflecting the lack of large, single-roofed buildings in these vistas, and then claims “the proposed scheme also looks to

preserve this view.” However, it immediately contradicts this by admitting the new building **“will be more visually prominent, as it will be taller, more contemporary, and have flat roofs.”**

* The visualisations reveal a structure that significantly disrupts the town’s historic roofscape, with the new height encroaching on iconic landmarks. Some of the visualisations of the far reaching views are completely inadequate, relying on red lines to indicate the building rather than a full rendering. Some of the views are also unrealistically zoomed out.

2. DESIGN FLAWS: INCOMPATIBLE AND INSENSITIVE

* The design’s flat roofs are justified as a means “to reduce the height of the proposed building as far as possible while maintaining the functionality of the internal spaces” (e.g. the 280-307 seat theatre and cinema spaces). This is misleading and not borne out by the visualisation. A comparison of the visualisation from the first public consultation exhibition to the second shows that the flat roof design is taller than the previous pitched roof. This contradicts their claim to a lower overall height and creates a stark and unpleasant contrast with Berwick’s traditional pitched-roof skyline, as referenced in the Heritage Statement’s own description of the conservation area’s “vertical rhythm.” The Design and Access Statement details these internal requirements, but the proposal provides no evidence that alternative designs – such as pitched roofs with adjusted internal layouts – were explored to harmonise better with Berwick’s character. The Energy Statement’s focus on operational efficiency (e.g. ASHPs, Page 10) offers no heritage offset, leaving the flat-roof decision as a functional choice rather than a heritage-sensitive one.

* The choice of materials further disrupts the existing composition rather than “bedding in” as claimed. The Heritage Statement asserts that the brickwork “reflects the local vernacular” (Section 3.12) and the architect claims it “matches tones of the local stone” (Material Palette), yet the “variation in coursing and relief detailing” (Design and Access Statement) prioritizes a contemporary look over the traditional brick bonds and detailing typical of Berwick’s historic buildings.

* Large expanses of unframed glazing and weathered Corten steel cladding have no historical precedent in Berwick’s Georgian and Victorian fabric and do not enhance the conservation area. Neither does the metal “brise-soleil,” introduced to reduce heat in the café area. This is a purely functional choice, not a traditional form, and entirely out of place in this historic architectural landscape.

* Finally, the prominent “MALTINGS” lettering proposal is highly inappropriate. The architect states: “Large graphic architectural lettering crowns the central form and adds variation to the roof profile.” This will dominate the view from the river. There can be no justification for such a feature, which is without precedent in the conservation area and seems to exist only to fulfil a desire to brand an expensive building in a vulgar, unimaginative fashion.

3. INADEQUATE MITIGATION: SUBJECTIVE AND UNCONVINCING

- * The Heritage Statement argues that the “high-quality modern design” and careful choice of materials mitigate any harm, a claim repeated several times in the Design and Access Statement, as if it were a settled standard upon which everyone agrees. Yet, this is a subjective response, heavily dependent on individual preferences, and cannot be used to wave away the serious issues of such a monumental change to the conservation area.
- * The Heritage Statement argues that the irrevocable changes to views and the intrusion of a “taller, more contemporary building” will be entirely mitigated by various factors. One is that the unpopular Sports Direct building will be partially obscured – an interesting approach, disguising an overlarge, unsympathetic building by placing an even larger, even more uncompromising one in front of it.
- * Another suggestion is that harm will be mitigated by the archaeological work done and the addition to the archaeological record. I cannot object to such an increase in knowledge about Berwick’s past, but can it really be used as a reason to inflict considerable aesthetic harm?
- * The claim that the scheme “looks to preserve” views (Section 3.3.2) is misleading and unsubstantiated by evidence, contradicting the visual impact of a taller, flat-roofed, contemporary structure. This is not mitigation but an admission of harm dressed up as progress, failing to meet the NPPF’s demand for conservation.

4. PUBLIC BENEFITS: UNPROVEN AND OVERSTATED

- * The proposal is keen to convince that public benefits will diminish or mitigate any harm, yet these claims are often made without robust evidence.
- * Only 6 full-time equivalent (FTE) jobs will be created, and while there’s a claim of 100 wider jobs, the proposal lacks economic modelling, revenue projections, or employment data to support feasibility.
- * The “commercial return for the town” through visitor spending is vague, with no financial analysis or estimates to validate the impact.
- * The projection of 135,000 annual visitors by 2030, up from 60,000 tickets/year (Planning Statement) lacks attendance forecasts, market analysis, or data on current trends to justify the increase. It depends upon doubling their current use of the Maltings. Two cinemas in an era of Hollywood disasters and streaming at home is a high-risk strategy even in the best economic times.

- * Energy cost savings through electrification and Air Source Heat Pumps are unquantified, as are maintenance costs for this large, complex structure in an exposed site – a design that relies on looking clean and fresh for commercial appeal.
- * The seagull question, well understood by Berwick residents, is little discussed, with mitigation such as unsightly netting is likely to cause further harm to the conservation area.
- * Little information is given on how other solutions to the Maltings' future might have been approached, leaving the overwhelming impression that this was the only option available, further weakening the case for its benefits. The aspiration of culture-led regeneration is often stated but there is little evidence to back it up.

5. FLAWED CONSULTATION: UNREPRESENTATIVE AND DISMISSIVE

- * The public consultation has been extremely underwhelming.
- * The Statement of Community Engagement (SCE) documents a process spanning two phases (July 2024 and January 2025) and four public exhibitions attracting approximately 300 attendees (Section 3.2) – at most 2.3% of Berwick's 13,000 residents (Planning Statement, Page 4).
- * The first phase, an exhibition at the Maltings open for five hours over two sessions (20th and 24th July 2024), offered a 6-page PDF download and online comments from August 2nd to 19th. The second, in January 2025, lasted seven hours in the Maltings bar. It was not signposted. Feedback forms were supplied but no pens or seating. Few exterior images were shown on the display boards, the emphasis being on the new facilities.
- * Across both phases, designs were physically available for just 12 hours, with no clear outreach to diverse groups like younger residents, low-income families, or those with accessibility needs, despite Berwick's challenges with low wages and limited education facilities (Planning Statement, Page 6).
- * Support for the project dropped from 82% in July 2024 to 63% in January 2025 which was a 19% decline when the flat roof design was shown. However these increased public concerns seem to have been downplayed in the rush to get to planning.
- * The SCE quotes an average of 72.5% support shown at the two consultations, but this is meaningless as the two groups are not independent, and the group sizes are different. Since the second design supersedes the first, it would be fairer to ignore the first, smaller sample and quote support for the design as being 63%.
- * The 448 total responses represent just 3.4% of the population, with no demographic breakdown.

* The SCE claims extensive stakeholder engagement with groups like CAAG, Berwick Civic Society, Berwick Town Council, and Historic England but provides no evidence of their input or influence. Some people were represented in multiple groups, risking homogeneity of input.

* This inadequate process sidelines the majority, erodes trust, and risks long-term opposition, threatening Berwick's social fabric.

CONCLUSION

This proposal prioritizes branding and convenience over Berwick's heritage, with a design that is entirely at odds with its historic character and that will not 'bed in' with Berwick. It does not enhance the conservation area as the Northumberland Local Plan demands. The unconvincing mitigations, unproven benefits and a questionable consultation do not pass the NPPF's heritage balancing test. There will be substantial harm to Berwick if this application is permitted.