

Final Draft Ipswich Local Plan Review

Ipswich Borough Council Note to Accompany
the Ipswich and Historic England
Draft Statement of Common Ground

June 2020

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Explanatory Note

- 1.1 As recognized stakeholders Historic England have been formally consulted at every stage of consultation on the emerging Ipswich Local Plan Review.
- 1.2 The Council met with Historic England following the Issues and Options stage to start discussions regarding the historic environment and approaches for the plan review.
- 1.3 At the Preferred Options stage of plan making, Historic England submitted representations on the Core Strategy DPD. IBC responded positively to the points raised through the Final Draft Local Plan.
- 1.4 Historic England submitted further representation to the Final Draft Local Plan consultation in March 2020 which identified some outstanding issues.
- 1.5 The objective of the Statement of Common Ground is to clarify the position between Ipswich Borough Council and Historic England on matters relating to the conservation of the historic environment in the Final Draft Ipswich Local Plan Review.
- 1.6 Ipswich Officers from the Planning Policy and Conservation Departments have been working together to prepare a draft Statement of Common Ground which responds to the concerns raised by Historic England in their Regulation 19 representation.
- 1.7 Ipswich has put forward its suggested amendments to Historic England and both parties have agreed to work together to progress the draft Statement of Common Ground. Discussions are however at a preliminary stage, and as such Ipswich will be submitting a draft version of the Statement of Common Ground which represents the Council's understanding of the issues raised by Historic England at Regulation 19, and the Council's initial response to these issues.
- 1.8 The draft Statement signals the Council's intentions with respect to the historic environment and a commitment to work with Historic England. It is the Council's intention to submit an updated version of the draft Statement before the examination.

**Statement of Common Ground between
Ipswich Borough Council as Local Planning Authority
and
Historic England – 3rd June 2020**

Scope

1. This Statement of Common Ground identifies areas of agreement and seeks to find a way forward on areas of potential disagreement between Historic England and Ipswich Borough Council (IBC) in relation to Historic England's representations to the Final Draft Ipswich Local Plan Review.

Objective

2. The objective of this Statement of Common Ground is to clarify the position between the named parties on matters relating to the conservation of the historic environment in the Final Draft Ipswich Local Plan Review.

Background

3. Within the Core Strategy and Policies Development Plan Document Review, Policy CS4 Protecting Our Assets, sets out the strategic approach to conserving and enhancing the Borough's built heritage, natural and geological assets. Policy DM13 Built Heritage and Conservation provides detailed policy for use when considering planning applications.
4. Within the Site Allocations Development Plan Document (incorporating the IP-One Area Action Plan) Review, the historic environment is addressed in a number of ways. The site sheets identify where there are historic environment constraints which will need to be taken into consideration in the redevelopment of sites. The site sheets constitute policy and are linked to the site allocation policies. The IP-One Opportunity Area guidelines in Chapter 6 also identify heritage assets which development proposals will need to consider.
5. The Council has produced Conservation Area Character Appraisals for all the conservation areas and these are reviewed from time to time under the Planning (Listed Buildings and Conservation Areas Act 1990. Conservation Officers are in the process of a comprehensive review of all of the borough's conservation areas and working on reappraisals to reflect Historic England's latest guidance, *Conservation Area Appraisal, Designation and Management: Advice Note 1*. The Council has also adopted the Ipswich Urban Characterisation Study Supplementary Planning Document to cover parts of the town outside the conservation areas to explore the character and interest of these areas and provide design guidance to support the management of future development. A comprehensive Urban Archaeological Database has also been prepared for Ipswich and is supported through an interactive Development and Archaeology Supplementary Planning Document. The borough therefore benefits from a number of adopted heritage and design documents which support the objectives of the local plan.

6. Buildings at risk within the Borough are concentrated within IP-One. They are reviewed regularly, and action is underway to address all the buildings currently at risk, through negotiation with the owners, supporting the preparation of funding bids and repairs being undertaken by owners with support of formal enforcement action where necessary. Grade I and II* buildings in Ipswich are dealt with through the national Heritage at Risk register.
7. As recognised stakeholders, Historic England have been formally consulted at every stage of consultation of the emerging Local Plan Review. The Council met with Historic England following the Issues and Options stage to start discussions regarding the historic environment and approaches for the plan review. At the Preferred Options stage of plan making, Historic England submitted representations on the Core Strategy DPD. IBC responded positively to the points raised through the Final Draft Local Plan. Historic England submitted further representation to the Final Draft Local Plan consultation in March 2020 which identified some outstanding issues.
8. The table below sets out the starting position between the parties. Supporting representations are not included.

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Historic England Objections to the Final Draft Ipswich Local Plan

9. Historic England has submitted the following objections to the Final Draft Ipswich Local Plan. Supporting representation are not included in this Statement of Common Ground.

Table 1 CCG Objections and areas of common ground and potential amendments to the Plan, Regulation 19

Representation ID	Policy/Chapter	Representation	Specific Amendment(s) Requested	Areas of Agreement	Areas of Disagreement (including reasons if applicable)
26655	Policy CS2: The Location and Nature of Development	Concerned that 'higher density homes' is a synonym for tall buildings/ flats. Appears to be confirmed in final paragraph of policy. Inference that 'high density' could 'compromise' the historic character of Ipswich, by way of tall buildings affecting the setting of these assets, impacting on their significance. Consider this section on densities needs to be clarified, and 'high', 'medium' and 'low' densities defined. Should also make clear that good design should not	Section on densities needs to be clarified, and 'high', 'medium' and 'low' densities defined. Should also make clear that good design should not only respect the historic character of an area but respond to it.	Policy CS2 is already caveated in terms of heritage issues, however Ipswich Borough Council agree to amend the final paragraph of policy CS2 to strengthen the wording on the historic environment and make clear that good design should not only respect the historic character of an area but also respond to it. Amend policy CS2, final paragraph, as follows: 'In the interests of maximising the use of previously developed land, development densities will be high in	Ipswich Borough Council disagree that the section on densities needs to be clarified. Paragraph 8.54 of Policy CS2 sets out that residential densities are defined in Policy DM23 (The Density of Residential Development). Policy DM23 set out the three minimum density standards for new housing development in Ipswich. High density refers to new housing development of at least 90 dwellings per hectare (dph), medium density refers to new housing developments of at least 40 dph (the average will

		only respect the historic character of an area but respond to it. High density does not need to take the form of flats, see 'Increasing Residential Density publication (2018).		the town centre, Portman Quarter and Waterfront, medium in the rest of IP-One and in and around the district centres, and low elsewhere, provided that in all areas it does not compromise respects and responds to the heritage assets and the historic character of Ipswich.'	be taken as 45 dph) and low density refers to new housing development under 40 dph (the average will be taken as 35 dph). This approach has already been implemented effectively through the adopted Local Plan.
26657/26660	Policy CS3: IP-One Area Action Plan	Extremely concerned about the status of the IP-One Area Action Plan.	If the IP-One Area Action Plan has been completed, then policy CS3 and supporting text need to clearly that this.	The work on the IP-One Area Action Plan has been completed and is incorporated in the Site Allocations and Policies Plan Document. Policy text – 'The Council will prepare have prepared and implement are implementing an IP-One Area Action Plan incorporated in the Site Allocations and Policies Development Plan Document to plan for significant change in central Ipswich. The Area	N.A

				<p>Action Plan will include includes policies which:</p> <p>Policy text – ‘Sites and designated areas within the IP-One area will be are identified on a revision of the policies maps to be prepared alongside the DPD.’</p> <p>Add new map defining and labelling the eight Opportunity Areas at the start of Chapter 6, page 67.</p> <p>The Council also agree to amend all other references throughout the plan, to clarify the status of the IP-One Area Action Plan.</p>	
26654/26657	<p>CS3: IP-One Area Action Plan</p> <p>SP2: Land Allocated for Housing SP4: Opportunity Sites SP5: Land Allocated for Employment Use</p>	<p>The Council has not set down the development principles which will be applied to new development and has not identified the heritage assets which development proposals will need to have regard</p>	<p>We recommend the inclusion of specific policy references for heritage assets and identified mitigation within policies SP2: Land Allocated for Housing SP4: Opportunity Sites</p>	N.A	<p>Within the Core Strategy, Policy CS4 Protecting Our Assets, sets out the strategic approach to conserving and enhancing the Borough’s built heritage, natural and geological assets. Policy DM13 Built</p>

	<p>SP11: The Waterfront SP12: Education Quarter SP13 Portman Quarter</p>	<p>to and integrate new development within the existing townscape.</p>	<p>SP5: Land Allocated for Employment Use SP11: The Waterfront SP12: Education Quarter SP13 Portman Quarter</p>		<p>Heritage and Conservation provides detailed policy when considering planning applications.</p> <p>The site sheets identify where there are historic environment constraints which will need to be taken into consideration in the redevelopment of sites. The site sheets constitute policy. The IP-One Opportunity Area guidelines in Chapter 6 also identify heritage assets which development proposals will need to have regard to.</p> <p>In addition, the Conservation Officer has prepared design guidance based on urban design principles for each of the Opportunity Areas which can be found in Part C IP One Opportunity Areas and includes site analysis and identifies listed buildings</p>
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					as part of the development options section. Appropriate commentary is already included so that any development proposed should be designed in a way that respects and enhances the setting of both listed and historic buildings.
26661	Delineation of the extent of the Opportunity Areas	Greater clarity is need regarding the extent of the opportunity areas.	The opportunity areas need to be clearly defined and labelled on the opportunities map.	Within the IP-One Area, eight opportunity areas have been identified which are defined on the map in Figure 1 (Chapter 2). For clarity it is proposed to insert a map at the start of Chapter 6, page 67, with the eight Opportunity Areas individually labelled.	N.A
26661	Delineation of the Opportunity Areas SP2: Land Allocated for Housing SP4: Opportunity Sites SP5: Land Allocated for Employment Use SP11: The Waterfront	Development principles for each area are not set out in policies SP11, SP12 and SP13. It is therefore unclear what status these development principles have in the context of decision-making. This does not	We request that you review the wording of these policies again, identifying which heritage assets (or their setting) would be affected by the proposed development.	N.A	The function of policies SP11, SP12 and SP13 is to set out the Council's approach to the location of specific functions within the IP-One Area. The heritage assets which would be affected by the proposed

	SP12: Education Quarter SP13 Portman Quarter	give a consistent vision for each area.			development are set out within the site sheets and the IP-One Opportunity Area guidelines (see comments above), both of which constitute policy and should be considered alongside the requirements of the SP policies also referred to above.
26658	Policy ISPA4 Cross Boundary Working to Deliver Sites	Site includes Grade II Listed Everton School Westerfield House, and adjacent to/within the setting of other Grade II Listed buildings (Allens House, and Laceys Farmhouse). Development must preserve and where possible enhance these assets and their settings where this setting contributes to significance. Heritage Impact Assessment required, which must assess the contribution this land makes to those elements	Heritage Impact Assessment of ISPA4.1 required. Any specific measures required from the assessment then integrated into a site specific policy.	Ipswich Borough Council consider that the preparation of the Local Plan has been informed by an appropriate evidence base regarding heritage assets. The Council consider that the plan is justified and based on a proportionate evidence base given that Humber Doucy Lane is a strategic allocation. Policy ISP4.1 is clear that the Council will work with neighbouring authorities to master plan the site and this work will be informed by a Heritage Impact	N/A

		<p>which contribute towards the significance of the heritage assets (designated and non-designated), and determine what impact its development might have upon their significance. Any specific measures required to remove/mitigate any harm should be included in a site specific policy for ISPA4.1.</p>		<p>Assessment. To give Historic England comfort that a Heritage Impact Assessment will be undertaken, Ipswich (Borough Council are willing to agree that a new paragraph on heritage impact is included within Policy ISPA4.</p> <p>The suggested wording is: 'To ensure that the significance of designated assets and their setting are conserved and where possible enhanced, the detailed form of new development at Humber Doucy Lane is to be informed by a Heritage Impact Assessment.'</p>	
26667	Policy DM15 Tall Buildings	<p>Support changes to Policy DM15, but request criterion 'i' is amended. Remain concerned that the tall building arc still includes a significant area within the setting of the Grade I Listed Willis</p>	<p>Amend criterion 'i' as follows; "Preserves strategic and local views, with particular reference to the settings of conservation areas, listed buildings, scheduled monuments,</p>	<p>Amend Policy DM15, criterion 'i', to include reference to 'the settings of' conservation areas and 'scheduled monuments': 'Preserves strategic and local views, with</p>	N.A

		<p>Building. One of its most striking features is its curvilinear glass curtain walling that reflects the surrounding buildings. Any new tall building therefore has the potential to impact on the setting, and therefore significance of this important building, and on this basis, we advise pulling back the arc boundary in the immediate vicinity. Our Tall buildings advice note provides more information.</p>	<p>and other heritage assets, and the wooded skyline visible from and towards central Ipswich."</p> <p>Pull back the tall building arc on the IP-One policies map.</p>	<p>particular reference to the settings of conservation areas, listed buildings, scheduled monuments, and other heritage assets, and the wooded skyline visible from and towards central Ipswich.'</p> <p><u>IP-One Policies Map (Tall Buildings Arch)</u></p> <p>The Council shares Historic England's desire to protect the setting and significance of the towns most important buildings. Your comments at Preferred Options were taken into account in the Final Draft Plan and criteria 'a' of Policy DM15 was amended to include references to heritage assets. In making this change it was considered that the concern regarding the tall building arch has been addressed and through</p>	
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				<p>the application of this policy, policy DM13 (Built Heritage and Conservation) and the provision of the NPPF, the impact on the setting of Listed Buildings such as the Willis Building would be appropriately assessed. If this change did not address the issue, the Council is willing to pull back the arch boundary in the immediate vicinity of the Willis Building and the churchyards of St Peters Church, St Mary at the Quay and St Nicholas Churches.</p>	
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Signatures

Signed

Name

Position

Date

Ipswich Borough Council

Signed

Name

Position

Date

Historic England

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