

# Ipswich Borough Council Final Draft Local Plan Review

## Statement of Common Ground between Ipswich Borough Council as Local Planning Authority and Historic England

8<sup>th</sup> October 2020



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**Statement of Common Ground between  
Ipswich Borough Council as Local Planning Authority  
and  
Historic England – 8th October 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. It should be read alongside the appendices document which set out mutually agreed proposed minor modifications to policy and supporting text.

**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. Policy DM14 Archaeology sets out requirements for development proposals which may disturb remains below ground.
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 guidance and are linked to the site allocation policies. In addition, the Inspectors have requested that any specific individual site requirements form part of the SP policy. 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 regularly 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. The condition of the buildings is reviewed regularly, and action is underway to address the buildings currently at risk, through pro-active 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 on 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. Through a series of constructive meetings between the Historic England and Ipswich Borough Council on the 30<sup>th</sup> June 2020, 1<sup>st</sup> September 2020 and 21<sup>st</sup> September 2020 and subsequent email exchanges, the two parties have successfully resolved the outstanding issues. The table below sets out the final agreed position between the parties.

## Historic England Objections to the Final Draft Ipswich Local Plan

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. The Statement should be read alongside the appendices document which set out the mutually agreed proposed modifications to policy and supporting text. Proposed new text is shown underlined and ~~deleted text~~ is shown struck through.

Table 1 - HE Regulation 19 objections, areas of common ground and mutually agreed amendments

<b>Representation ID</b>	<b>Policy/Chapter</b>	<b>Representation</b>	<b>Specific Amendment(s) Requested</b>	<b>Areas of Agreement</b>	<b>Areas of Disagreement (including reasons if applicable)</b>
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.	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.	Paragraph 8.54 of Policy CS2 sets out that residential densities are defined in Policy DM23 (The Density of Residential Development), however this can be clarified by elevating the information into the policy text from the supporting text.  'In the interests of maximising the use of previously developed land, development densities will be high in the town centre, Portman Quarter and Waterfront, medium in the rest of IP-	N.A

		<p>Should also make clear that good design should not 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).</p>		<p>One and in and around the district centres, and low elsewhere, provided that in all areas it does not compromise heritage assets and the historic character of Ipswich. <u>Further detail on the Council's approach to density is out in Policy DM23 The Density of Residential Development.</u></p> <p>The Council will 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.</p> <p>Amend Policy CS2, final paragraph, as follows:          'In the interests of maximising the use of previously developed land, development densities will be high in the town centre, Portman Quarter and Waterfront,</p>	
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				medium in the rest of IP-One and in and around the district centres, and low elsewhere, provided that in all areas it <del>does not compromise</del> <u>respects and responds positively to the</u> heritage assets and the historic character of Ipswich.’	
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 state this.	<p>The work on the IP-One Area Action Plan has been completed and is incorporated in the Site Allocations and Policies Plan Document. It is accepted that this would benefit from greater clarity.</p> <p>Policy text – ‘The Council <del>will prepare</del> <u>have prepared</u> and <del>implement</del> <u>are implementing</u> 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 Action Plan <del>will include</del></p>	N.A

				<p><u>includes policies which:</u></p> <p>Policy text – ‘Sites and designated areas within the IP-One area <del>will be</del> <u>are identified</u> on a revision of the policies maps <del>to be prepared</del> <u>alongside the DPD.</u>’</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</p> <p>SP4: Opportunity Sites</p> <p>SP5: Land Allocated for Employment Use</p> <p>SP11: The Waterfront</p> <p>SP12: Education Quarter</p> <p>SP13 Portman Quarter</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 to and integrate new development within the existing townscape.</p>	<p>We recommend the inclusion of specific policy references for heritage assets and identified mitigation within policies</p> <p>SP2: Land Allocated for Housing</p> <p>SP4: Opportunity Sites</p> <p>SP5: Land Allocated for Employment Use</p> <p>SP11: The Waterfront</p> <p>SP12: Education Quarter</p> <p>SP13 Portman Quarter</p>	<p>The SP policies set out the Borough Council’s preferred approach to the location of specific functions within the IP-One Area. To address concerns that the SP policies fail to set down the development principles which will be applied to new development, it is proposed to set out the site related development constraints within the SP policies including heritage</p>	N.A

				<p>assets which development proposals will need to have regard to. Addition policy text will be added to the SP policies in order to cross reference between the allocation policies and the guidance contained within the site sheets.</p> <p>The heritage assets affected by development are also set out on the site sheets and should be considered alongside the requirements referred to in the SP policies.</p> <p>The IP-One Opportunity Areas are a hybrid of character areas and development briefs. In light of comments from Historic England the Borough Council has reviewed the Opportunity Areas to better articulate character areas and a vision for each Opportunity Area. The new text includes additional historic</p>	
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				<p>environment information on each Opportunity Area and signposts relevant policies and supporting documents (see appendices 1-9).</p> <p>During the course of discussions with Historic England it was considered necessary to clarify that in order to meet the requirements of scheduled monument consent development proposals will need to demonstrate a very high level of public benefit. It was suggested that this information should be included within Opportunity Areas B and C (see appendices 3 and 4) and development management policy DM14 Archaeology (see appendix 12). It was also proposed to include the information within the relevant site sheets.</p> <p>Amend site sheets IP011a, IP011b, IP035, IP048a, IP048b and</p>	
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				IP154b to include the following line - <u>'In order to obtain scheduled monument consent, development proposals directly affecting the scheduled monument will need to deliver significant public benefit.'</u>	
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). This will be clarified by inserting a map at the start of Chapter 6 with the eight Opportunity Areas individually labelled and allocated sites identified (see appendix 1).	N.A
26661	Delineation of the Opportunity Areas  SP2: Land Allocated for Housing SP4: Opportunity Sites SP5: Land Allocated for Employment Use	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	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.	The SP policies set out the Borough Council's preferred approach to the location of specific functions within the IP-One Area. It is proposed to set out the site related development constraints	N.A

	<p>SP11: The Waterfront          SP12: Education Quarter          SP13 Portman Quarter</p>	<p>does not give a consistent vision for each area.</p>		<p>within the SP Policies including heritage assets which development proposals will need to have regard to. Additional policy text will be added to the SP policies in order to cross reference between the allocation policies and the guidance contained within the site sheets.</p> <p>The heritage assets affected by a proposed development are also set out in the site sheets and should be considered alongside the requirements referred to in the SP Policies.</p> <p>The IP-One Opportunity Areas are a hybrid of character areas and development briefs. In light of comments from Historic England the Borough Council has reviewed the Opportunity Areas to better articulate character areas and a vision for each</p>	
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				Opportunity Area. The new text includes additional historic environment information on each Opportunity Area and signposts relevant policies and supporting documents (see appendices 1-9).	
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 which contribute towards the significance of the heritage assets	Heritage Impact Assessment of ISPA4.1 required. Any specific measures required from the assessment then integrated into a site specific policy.	Ipswich Borough Council have completed a Heritage Impact Assessment for Humber Doucy Lane (IPSA 4.1). Site sheet ISPA4.1 has been amended to take forward the recommendations made in the HIA and will inform the joint master planning of the site. The amended text is set out in appendix 10.	N/A

		(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.			
26667	Policy DM15 Tall Buildings	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 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	Amend criterion 'i' as follows; "Preserves strategic and local views, with 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."  Pull back the tall building arc on the IP-One policies map.	Amend Policy DM15, criterion 'i', to include reference to 'the settings of' conservation areas and 'scheduled monuments': 'Preserves strategic and local views, with particular reference to <u>the settings of</u> conservation areas, listed buildings, <u>scheduled monuments</u> , and other heritage assets, and the wooded skyline visible from and towards central Ipswich.'  <u>IP-One Policies Map (Tall Buildings Arch)</u>  The Council shares	N.A

		boundary in the immediate vicinity. Our Tall buildings advice note provides more information.		Historic England's desire to protect the setting and significance of the town's most important buildings. The Council have amended the tall building arc to pull back the arc boundary in the immediate vicinity of the Willis Building and the churchyards of St Peters, St Mary at the Quay and St Nicholas Churches (see appendix 11).	
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Signatures



Signed

Name: Martyn Fulcher

Position: Head of Development

Date: 8<sup>th</sup> October 2020

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Signed :

Name: Andrew Marsh

Position : Historic Environment Planning Adviser, East of England

Date: 8<sup>th</sup> October 2020

Historic England