

Babergh and Mid Suffolk Joint Local Plan

Statement of Common Ground

Between

Babergh and Mid Suffolk District Councils (B&MSDC)

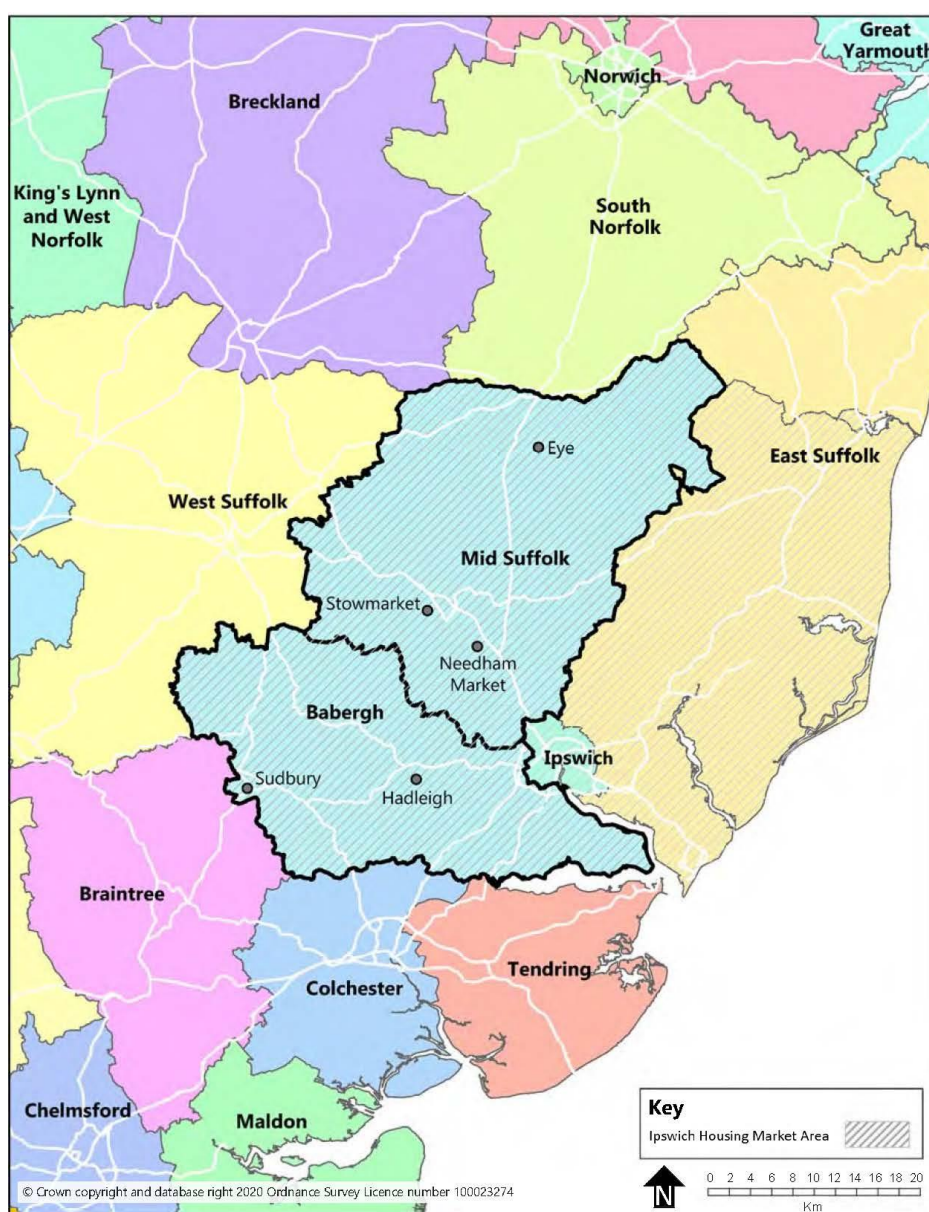
and

Historic England

(Interim) November 2020

1. Areas covered by the Statement of Common Ground

The Statement of Common Ground relates to the area covered by the local planning authorities of Babergh District Council and Mid Suffolk District Council.



2. Signatories to this Statement of Common Ground

The signatories to this Statement of Common Ground are:

- Babergh District Council;
- Mid Suffolk District Council; and
- Historic England.

3. Purpose and scope of Statement of Common Ground

Local planning authorities have a statutory duty to co-operate with specified bodies in relation to strategic planning matters. Historic England are a prescribed body subject to the duty to co-operate as set out in the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) and are required to be involved in the plan-making process.

Objections were raised by Historic England to the consultation on the Babergh and Mid Suffolk Joint Local Plan Preferred Options document (July 2019), that the heritage section of the Joint Local Plan did not properly assess the heritage impact of site allocations. Babergh and Mid Suffolk District Councils have sought to address these concerns as detailed in this Statement of Common Ground which should be read as a work in progress.

4. Strategic matters being addressed

- i) Heritage impact concerns.

Historic England commented in respect of the evidence base for site allocations:

It is important that sites that are selected as allocations are based on an understanding of their potential impact upon the historic environment. Whilst we welcome the Councils' identification of designated heritage assets with a given distance of the potential sites and the illustration of these on the place maps, the Councils need to undertake a more holistic process which seeks to understand the significance of these assets and the contribution which each site makes to this significance. Whilst a useful starting point, a focus on distance or visibility alone as a gauge of impact is not appropriate. Historic England Advice Note 3 (The Historic Environment and Site Allocations in Local Plans) sets out a methodology designed to assist local planning authorities in this process. However, it is also important that any mitigation measures identified as part of any Heritage Impact Assessment are reflected in the Policy framework of the Local Plan. We strongly advise that Heritage Impact Assessments are prepared for LA053 (Brantham), LA055 and LA054 (Capel St Mary), LA041 (Chilton), LA008 (Copdock and Washbrook), LA060 and LA061 (east Bergholt), LA075 (Shotley Street), LA001, LA002, and LA003 (Claydon and Barnham), LA078, LA079 (Stowupland), LA084, LA088, LA089, and LA090 (Thurston), and LA094 and LA095 (Woolpit).

Outcome

A district-wide Heritage Impact Assessment (HIA) for Local Plan Site Allocations has been undertaken. Engagement with Historic England took place during March and April 2020 as the methodology was developed. In April 2020, Historic England confirmed their support for the methodology and the approach to presenting the site assessments.

A draft stage 1: strategic appraisal was produced in May 2020. Further detailed work was undertaken at stage 2.

Sites LA053 (Brantham), LA055 (Capel St Mary), LA008 (Copdock and Washbrook), LA075 (Shotley Street), LA001, LA002 and LA003 (Claydon and Barham), LA078 (Stowupland), LA089 (Thurston) and LA095 (Woolpit) have all been assessed through a detailed Heritage Impact Assessment.

Sites LA054 (Capel St Mary), LA041 (Chilton), LA060 and LA061 (East Bergholt), LA084, LA088 and LA090 (Thurston) and LA094 (Woolpit) have all now been granted permission and have not been assessed through detailed Heritage Impact Assessment.

Site LA079 (Stowupland) is no longer being proposed in the Joint Local Plan and has not been assessed through Heritage Impact Assessment.

As a result of the stage 1 appraisal, Heritage Impact Assessments were also undertaken on three further sites which were LA051 (Botesdale and Rickinghall), LA013 (Sproughton) and LA116 (Sproughton).

Following the Heritage Impact Assessment, site LA051 (Botesdale and Rickinghall) is no longer being proposed in the Joint Local Plan.

Other matters

Other matters that were raised included the following.

Matter to be addressed:

- The site allocations policies require more detail – *At the moment, heritage assets are not always referenced in the site specific policies. Paragraph 16d of the NPPF makes it clear that policies should provide a clear indication of how a decision maker should react to a development. The policies should be re-worded to include criteria for clarity and to provide greater protection for the historic environment and robust policies that provide the decision maker and developers with a clear indication of expectations for the sites. Further details of our suggestions in this regard are given in the attached table.*

Outcome

- Heritage assets are now detailed in the site-specific policies.

Matter to be addressed:

- Concerns regarding hamlet allocations and the approach to settlement boundaries – *We strongly advise that all allocations are illustrated on the place maps and that these are keyed up to show that are intended for small-scale growth only, and that the policy is amended to include a new criterion to policy SP3 at bullet D to make it clear that development will only be permitted where it can be demonstrated that “special regard” has been had to preserving and enhancing any designated heritage assets or their settings.*

Outcome:

- Small sites within settlement boundaries are now been shown as allocations rather than within settlement boundary expansions.

Matter to be addressed:

- *Suggested a number of changes to the Historic Environment Policy (Policy LP20) to ensure consistency with the NPPF, legislation and to provide greater protection to the historic environment.*

Outcome:

- The Councils have re-worded the policy to comply with the National Planning Policy Framework and restructured the policy with headings.



It is agreed that Babergh and Mid Suffolk District Councils have responded positively to the suggestions and recommendations made by Historic England, in particular through undertaking a district-wide Heritage Impact Assessment and more detailed assessment for the sites mentioned by Historic England where no planning permission existed.

While Historic England has confirmed their support for the methodology and the approach to presenting the site assessments, they have yet to see the final report and revised policy wording. Historic England will need to review these and any other policy changes in detail before agreeing a final Statement of Common Ground prior to Submission.

5. Process for reviewing the Statement of Common Ground

The Statement of Common Ground will be reviewed prior to submission of the Joint Local Plan for Examination, unless exceptional urgent matters emerge requiring faster review and will be updated where amendments are necessary.

6. Signatories

<div>Signed on behalf of Babergh District Council</div> <div></div> <div>Name: Tom Barker Position: Assistant Director Sustainable Communities</div>	<div>Date: 11/11/20</div>
<div>Signed on behalf of Mid Suffolk District Council</div> <div></div> <div>Name: Tom Barker Position: Assistant Director Sustainable Communities</div>	<div>Date: 11/11/20</div>

Signed on behalf of the Historic England

Date: 11th November 2020

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Name: Andrew Marsh

Position: Historic Environment Planning Adviser, East of
England.