Statement of Common Ground
between East Suffolk Council and
Historic England

Matters relating to the historic environment

Local Plan covering the former Suffolk Coastal area

August 2019
Purpose of Statement

1 This Statement of Common Ground sets out the agreed position between Historic England and East Suffolk Council (the Council) with respect to the historic environment.

2 Historic England made a number of representations to the Regulation 19 Final Draft Local Plan consultation in relation to the historic environment. The Inspector’s Matter, Issues and Questions issued on 24th June 2019 are relevant to a number of the representations. This Statement of Common Ground relates to the following policies/representations:

- Introduction (Rep ID: 1029),
- Environmental Context (Rep ID: 1030 & 1031),
- First paragraph of vision (Rep ID: 1032),
- Policy SCLP3.4 & Table 3.6 (Rep ID: 1036 & 1038),
- Policy SCLP11.1 (Rep ID: 1051 & 1052),
- Policy SCLP11.3 (Rep ID: 1055),
- Policy SCLP11.4 (Rep ID: 1057, 1058 & Inspector’s question: 4.38),
- Policy SCLP11.5 (Rep ID: 1062 & 1063),
- Policy SCLP11.6 (Rep ID: 1059, 1061 & Inspector’s question: 4.40),
- Policy SCLP11.8 (Rep ID: 1065),
- Policy SCLP12.2 (Rep ID: 1078 & Inspector’s question: 3.19),
- Policy SCLP12.3 (Rep ID: 1080, 1082 & Inspector’s question: 3.9),
- Policy SCLP12.5 (Rep ID: 1084 & Inspector’s question 3.14),
- Policy SCLP12.16 (Inspector’s question 3.22),
- Policy SCLP12.19 (1085 & Inspector’s question: 3.24),
- Policy SCLP12.20 (Rep ID: 1087),
- Policy SCLP12.24 (Rep ID: 1089),
- Policy SCLP12.25 (Rep ID: 1092 & 1093 & Inspector’s question 3.32),
- Policy SCLP12.29 (Rep ID: 1101, 1103 & 1105),
- Policy SCLP12.32 (Rep ID: 1108, 1109 & Inspector’s question: 3.44),
- Policy SCLP12.33 (Rep ID: 1111, 1112 & Inspector’s question 3.46), and
Agreed Position

The parties agree to the main and additional modifications below. The parties agree that subject to the modifications the Plan is sound in respect of matters below. Insertions are shown in underline and deletions are shown in strikethrough.

Paragraphs 1.1, the Vision, 6.2, 9.57 and Appendix C

Historic England have raised representations (Rep ID: 1029 and 1032) that there should be consistent references to the historic environment through the Local Plan. The modifications below would resolve this issue.

Changes to supporting text

Modification to Paragraph 1.1:

“Suffolk Coastal is a uniquely attractive place to live and work, combining a strong economy with a natural, and built and historic environment second to none. Those advantages however present the Council with the challenge of balancing the delivery of development that continues to stimulate and support the economy and provides attractive and affordable homes for current and future generations, with the need to preserve and enhance the precious, but sometimes vulnerable environment. This Local Plan seeks to be ambitious in growing the District’s economy, in particular recognising the opportunities presented by the Port of Felixstowe, the energy sector and key transportation routes, boosting the delivery of homes to contribute to addressing the national housing shortage and responding to needs for a greater mix of homes and increasing the delivery of affordable housing, whilst improving infrastructure provision and conserving our natural, built and historic environment.”

Modification to Vision for Suffolk Coastal 2018-2036:

“Significant levels of growth which maintains the distinctive character and role of settlements, while conserving and enhancing the built, historic and natural environments will have been planned for and delivered.”

Modification to Paragraph 6.2:

Sustainable growth in tourism can promote a better understanding and appreciation of the natural and, built and historic environment, which in turn will help to maintain these finite resources for future generations.
Modification to Paragraph 9.57:

It is important to ensure that new development does not impede flood flows, reduce flood storage capacity, or exacerbate problems of flooding in areas downstream through an increase in run-off from impermeable surfaces such as roofs and paved areas. A common way of achieving this is through use of sustainable drainage systems (SuDS). Sustainable drainage systems can take up large areas of land on development sites and therefore significantly influence the layout through good design which responds to built, historic and natural surroundings.

Modification to Appendix C (Policy SCLP12.34):

Protection of the natural, historic and built environments

Number of applications which have an impact on the natural, historic and built environment

Environmental Context - Paragraphs 1.13 & 1.32

Historic England representations (Rep ID: 1030 and 1031) have stated that the Plan should quantify the archaeological and historic parks and gardens interest through numbers of scheduled monuments and registered parks and gardens. The modifications below would resolve this issue.

Changes to supporting text

Modification to Paragraph 1.13

In terms of built the historic environment, there are 36 Conservation Areas with around 2,300 Listed Buildings, alongside a rich archaeological interest, historic parks and gardens and a military history, 117 Scheduled Monuments, 8 registered historic parks and gardens, 17 locally identified historic parks and gardens and 1 protected wreck, alongside a military history, all of which combine to form the historic landscape.

Modification to Cultural section of Table at Paragraph 1.32

High number and quality of heritage assets.

Environmental Context / Historic Environment

Historic England representations (Rep ID: 1030, 1031 and 1055) have stated that the Plan (in the Suffolk Coastal Context and Historic Environment sections) should quantify archaeological
and historic parks and gardens through numbers of scheduled monuments and registered parks and gardens and there should be more specific references to the historic environment of Suffolk Coastal. The modifications below, in Chapter 11, would resolve this issue.

**Changes to supporting text**

**Modification to Paragraph 11.19:**

The acknowledged quality of the built, natural and historic environments within the District is one of its key assets, making it an attractive area to live, work and visit. The District is home to around 2,300 Listed Buildings, 36 Conservation Areas, over 100 Scheduled Monuments, more than 7,300 sites of archaeological interest and 67 Parks and Gardens of Special Historic Interest as well as a number of 17 locally identified historic parklands and 1 protected wreck, alongside a military history. Within the District the heritage assets characteristic of the area reflect the important coastal, cultural, farming and military history and relate to a diverse range of building typologies including resort tourism, aviation, landed estates and park and garden structures amongst many others. Of international importance is the archaeological Anglo-Saxon royal burial site of Sutton Hoo; Bawdsey Manor which is significant for the development of radar; and Snape Maltings, a cultural venue of outstanding significance. The quality of the Suffolk Coastal area is crowned by these highly valuable sites, the diversity of which illustrates the variation of the area’s distinctiveness.

**Policy SCLP3.4: Proposals for Major Energy Infrastructure Projects**

Representations from Historic England (Rep ID: 1036 and 1038) recommend that setting is included in the bullet point related to historic assets in Table 3.6 and that provisions for the historic environment are included in the policy. The representations also note that noise and light can affect the historic environment. The modifications below would resolve this issue.

**Changes to supporting text**

**Modification to Environment section of Table 3.6:**

Potential impact on designated heritage assets and non-designated heritage assets and archaeological assets, and their settings, in the areas within and surrounding Major Energy Infrastructure Projects.

“Impact of light pollution to nocturnal species, and on the AONB and the historic environment”
“Habitat loss and noise disturbance for species and noise disturbance regarding the historic environment”

“Effect of light and dust on nature conservation sites and the historic environment”

Modification to paragraph 3.55:

“As well as the social impacts affecting the communities nearby, the environmental impacts of a site on the coast, within the Area of Outstanding Natural Beauty and close to protected landscapes such as Sizewell Marshes and Minsmere Nature Reserve, and the impact on the Suffolk Seascape will need to be assessed both during construction and beyond. Impacts on the historic environment should be avoided, and if not possible, minimised. Opportunities to co-locate infrastructure may reduce impacts, and there may be opportunities to enhance the setting of assets through restoration after construction, operation and decommission.”

Changes to policy

Modification to policy SCLP3.4:

Insert new criterion below the current criterion e) to read:

“f) Requirement for a robust Heritage Impact Assessment;”

Policy SCLP11.1: Design Quality

Representations from Historic England (Rep ID: 1051, 1052 and 1109) state that the supporting text could specifically refer to examples within Suffolk Coastal, that the policy should refer to elements of local distinctiveness and character, and through further review of the site allocations the Plan should provide a definition for innovative design. The modifications below would resolve this issue.
Changes to supporting text

Modification to Paragraph 11.4:

“The National Planning Policy Framework establishes the importance of supporting innovative and outstanding design. The Council encourages this across the District where it is respectful of its surroundings. In areas of more limited design quality the Council encourages development to significantly enhance design quality through innovative and creative means. Innovative design should be understood to include, but not be limited to, high levels of sustainability and new construction methods and materials.”

Modification – new paragraph directly below Paragraph 11.4:

“The local character and distinctiveness of Suffolk Coastal are derived from the diversity of architecture, landscape and coastal setting. These have given risen to an architectural typology not just of farmhouses, picturesque cottages and churches but of resort tourism, military research and defence, agri-industry, park and garden structures, energy and landed estates. Buildings and structures that typify the District range from 16th century moot halls, a wide representation of 16th and 17th century farmhouses, the grandest Georgian country house in Suffolk, designed 18th and 19th century landscapes and 19th and 20th century military airfields, towers and pagodas.”

Policy SCLP11.4: Listed Buildings

Historic England representations (Rep ID: 1057 and 1058) recommend that the statutory provisions in relation to listed buildings are referred to and that criterion a) as currently drafted is not sound as it implies that setting has a separate significance to a listed building. Inspector’s question 4.38 asks whether the policy is consistent with national policy as set out in paragraph 190 of the Framework in regard to the setting of a Listed Building. The modifications below would resolve this issue.

Changes to supporting text

Modification to paragraph 11.31:

Listed Buildings are designated heritage assets and, as such, are afforded a high level of protection. There are around 2,300 Listed Buildings in the District. Listed Building consent will be required for many works relating to Listed Buildings, and is a separate consent to planning permission. National planning policy relating to Listed Buildings, as designated assets, is contained in the National Planning Policy Framework and will be applied alongside policy SCLP11.4. As set out in the relevant sections of the Planning (Listed Buildings and Conservation Areas) Act 1990, a planning application and listed building consent application
that impacts a listed building, or its setting, must have regard to the desirability of preserving the listed building or its setting or any features of special architectural or historic interest which it possesses.

**Changes to policy**

*Modification to policy SCLP11.4:*

a) Demonstrate a clear understanding of the significance of the building and/or its setting alongside an assessment of the potential impact of the proposal on that significance.

**Policy SCLP11.5: Conservation Areas**

Representations from Historic England (Rep ID: 1062) state that the opening sentence of the supporting text requires further explanation. The modifications below would resolve this issue. Representations from Historic England (Rep ID: 1063) states that the criteria for assessing the impact of development on a Conservation Area should be applied to the setting of a Conservation Area as well. The Inspector’s question 4.39 asks whether the listed criteria related to the demolition of buildings in a Conservation Area are consistent with the NPPF and justified. The changes set out below would address these issues.

*Change to supporting text*

*Modification to Paragraph 11.32:*

Conservation Areas are designated heritage assets and are afforded a high level of protection under the relevant sections of the Planning (Listed Buildings and Conservation Areas) Act 1990 and in National Planning Policy.

**Changes to policy**

*Modifications to policy SCLP11.5 (due to the scale of the modifications the Policy is set out in its entirety):*

Development within, or which has potential to affect the setting of, Conservation Areas will be assessed against the relevant Conservation Area Appraisals and Management Plans and any subsequent additions or alterations. Developments should be of a particularly high standard of design and high quality of materials in order to preserve or enhance the character or appearance of the area.

Proposals for development within a Conservation Area should:
a) Demonstrate a clear understanding of the significance of the conservation area alongside an assessment of the potential impact of the proposal on that significance;
b) Preserve or enhance the character or appearance of the conservation area;
c) Be of an appropriate design, scale, form, height, massing and position;
d) Retain features important to settlement form and pattern such as open spaces, plot divisions, position of dwellings, hierarchy of routes, hierarchy of buildings, and their uses, boundary treatments and gardens; and
e) Use high quality materials and methods of construction which complement the character of the area.

Proposals for development which affect the setting of a Conservation Area should be considered against criteria a), c) and e) above.

Proposals which involve the demolition of non-listed buildings that make a positive contribution to a Conservation Area, as including those identified in Conservation Area Appraisals and Management Plans, will only be permitted where be expected to demonstrate:

f) The building has no architectural, historic or visual significance; or
g) The building is structurally unsound and beyond technically feasible and economically viable repair (for reasons other than deliberate damage or neglect); or
h) All measures to sustain the existing use or find an alternative use/user have been exhausted.

In all cases, proposals for demolition should include comprehensive and detailed plans for redevelopment of the site.

Policy SCLP11.6: Non-Designated Heritage Assets

Representations from Historic England (Rep ID: 1059 and 1061) state that the reference to non-designated archaeological assets of demonstrably equivalent significance to scheduled monuments (as per footnote 63 to para 194 (b) of the NPPF) being subject to Policy SCLP11.3 should be incorporated into Policy SCLP11.6 or Policy 11.7. Historic England representations also raise that the policy may prevent areas, parks and gardens, or archaeological sites being identified. Inspector’s question 4.40 asks whether the policy is consistent with national policy in paragraph 197 of the Framework in terms of the significance of a building. The modifications below would resolve this issue.

Changes to supporting text

Modification to paragraph 11.34:
Non-designated heritage assets can vary in type and form, and should possess a degree of heritage significance that merits consideration in planning decisions. Non-designated heritage assets can be either buildings or structures, or non-built assets such as archaeological assets and parks and gardens. The Council encourages Neighbourhood Plans to identify non-designated heritage assets, examples of such can be seen in the Great Bealings and Martlesham Neighbourhood Plans. Neighbourhood planning groups seeking to identify Non-Designated Heritage Assets are encouraged to work with the Council in developing the necessary identification criteria, particularly in respect of potential Non-Designated Heritage Assets that are not buildings or structures.

Main modification to paragraph 11.35:

In relation to archaeological assets, any non-designated heritage assets that are deemed to be of equal importance to a Scheduled Monument by way of a heritage assessment and/or government guidance should be considered under the same policy as a Scheduled Monument, in accordance with paragraph 194 and footnote 63 of the NPPF. In this case, Policies SCLP11.3 and SCLP11.7 along with the National Planning Policy Framework will apply.

Modification to paragraph 11.39:

Scheduled Monuments, and non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to scheduled monuments, are nationally significant assets and afforded great protection in the National Planning Policy Framework.

Changes to policy

Modification to the first paragraph of Policy SCLP11.6:

Proposals for the re-use of Non-Designated Heritage Assets which are buildings or structures will be supported if compatible with the elements of the fabric and setting of the building or structure which contribute to its significance. New uses Applications, including those for a change of use, which result in harm to the significance of a Non-Designated Heritage Asset or its setting will be considered based on the wider balance of the scale of any harm or loss, and the significance of the heritage asset.”

Main modification to the final paragraph of Policy SCLP11.6:

“Neighbourhood Plans can identify Non-Designated Heritage Assets. However, the protection afforded to these should be no more than that provided to Non-Designated Heritage Assets protected by this policy. Buildings or structures Heritage assets identified as Non-Designated Heritage Assets should at least meet the Council’s criteria for identifying Non-Designated Heritage Assets.
Policy SCLP11.8: Parks of Gardens of Historic or Landscape Interest

Representations from Historic England (Rep ID: 1065) state that it is essential to set out what the criteria are for identifying historic parks and gardens. The modifications below would resolve this issue.

*Changes to supporting text*

*Modification – new paragraph directly below Paragraph 11.44:*

The criteria for identifying the existing Historic Parks and Gardens are set out below:

- The extent of parkland coverage is significant, or has been in the past, usually in excess of 50 hectares;
- The parkland either provides, or did so in the past, the setting of an historic house;
- The parkland’s historical development is considered unique within the District;
- The parkland’s evolution has been influenced by a notable landscape designer;
- The parkland contains fine examples of those features associated with historic parklands. These features are as follows:
  - Free standing parkland trees,
  - Parkland tree belts, clumps and woodland,
  - Exotic planting,
  - Avenues,
  - Hedges,
  - Grassland,
  - Lakes,
  - Fish ponds and stews,
  - Fountains, cascades and canals,
  - Moats,
  - Ha-has,
  - Parkland buildings,
  - Walls,
  - Kitchen gardens, and
  - Gatehouses, lodges and gateways;
- The parkland positively contributes to the wider, surrounding, landscape; and
- When lying adjacent to a settlement, the parkland provides an attractive setting and, indeed may have a relationship with that settlement.

The boundaries of Historic Parks and Gardens are defined by:

- That area currently forming the visual extent of parkland, and
- Any additional area which historically formed part of the extent of parkland and which continues to display remnants of that former park.

Policy SCLP12.2: Strategy for Felixstowe

Representations from Historic England (Rep ID: 1078) state that the portrait of Felixstowe could be improved by highlighting more specifically its seaside, mainly non-designated, architectural legacy. The modifications below would resolve this issue.

Changes to supporting text

Modification to Paragraph 12.21:

The town serves many important functions in respect of community and education provision alongside a range of shopping opportunities and facilities for the residents of Felixstowe and the surrounding communities. Felixstowe also benefits from its coastal location and retains an attractive resort with access to the beach providing a range of complementary resort attractions and traditional seaside activities, alongside a rich architectural heritage and high quality buildings. **This heritage is reflected in the two extensive Conservation Areas that serve to preserve and enhance the predominantly unlisted late Victorian and Edwardian architectural legacy of the resort.** Felixstowe is also home to the largest container port in the country which provides a variety of economic opportunities and jobs locally as well as supporting the national and international economies.

Policy SCLP12.3: North Felixstowe Garden Neighbourhood

Representations from Historic England (Rep ID: 1101, 1103, and 1105) highlighted the impact that the North Felixstowe Garden Neighbourhood could have on the historic environment, but at the Regulation 19 consultation Historic England did not have capacity to review the North Felixstowe Garden Neighbourhood Heritage Impact Assessment. Having subsequently reviewed the Heritage Impact Assessment Historic England commented that the Heritage Impact Assessment should be referenced in the Policy. The following modification would take account of this comment.

Modification to Policy SCLP12.3:

h) Setting of Listed Buildings in proximity to the site to be preserved Measures to sustain, and where possible enhance or better reveal the significance of heritage assets and their settings, having regard to the conclusions of the Council’s North Felixstowe Garden Neighbourhood Heritage Impact Assessment;
Policy SCLP12.5: Land at Brackenbury Sports Centre

Representations from Historic England (Rep ID: 1084) state that the site is next Grade II Listed Tyndale House which has not been identified in the policy or supporting text. Inspector’s question 3.14 asks whether the policy would be effective in conserving the significance of the Grade II Listed Tyndale House. The modifications below would resolve this issue.

Modification to Paragraph 12.82:

Development which provides units targeted at the ageing population will be welcomed as will the delivery of smaller units to provide a mix of residential opportunities which. Development should preserve respect the setting of surrounding Listed Buildings and residential uses, with particular regard to Grade II Tyndale House.

Modification to policy SCLP12.5 through an additional criterion:

i) Design, layout and landscaping of the development should be carefully designed to preserve the setting of the adjacent Grade II Listed Tyndale House.

Policy SCLP12.14: Spa Pavilion to Manor End

Representations from Historic England (Rep ID: 1078) state that the portrait of Felixstowe could be improved by highlighting more specifically its seaside, mainly non-designated, architectural legacy. Inspector’s question 3.19 asks whether the policy would be effective in sustaining and enhancing the significance of the Conservation Area and is it consistent with national policy. The modifications below would resolve this issue.

Changes to policy

Modification to the final paragraph of policy SCLP12.14:

Between the Pier and the Spa Pavilion, activities which promote cultural attractions including cafes, restaurants and shops on the ground floor will be supported where they respect make a positive contribution to the significance of the two Conservation Areas designation, and respect the Registered Gardens and respect the Edwardian and Victorian architectural heritage of the resort.

Policy SCLP12.16: Felixstowe Leisure Centre
The Inspector, through question Q3.22, has asked if the policy is effective in sustaining and enhancing the significance of the Conservation Area and if the policy is consistent with national policy in this regard.

**Changes to supporting text**

**Modification to Paragraph 12.164:**

Any future redevelopment of this site will need to reflect make a positive contribution to the Conservation Area and architectural heritage of Felixstowe and provide a built form that promotes includes attractive spaces for resort, tourist and recreational uses that support both the day time and night time economy of Felixstowe.

**Changes to policy**

**Modification to policy SCLP12.16 through an additional criterion:**

Design and layout which complements the prominent seafront location and makes a positive contribution to character of the significance of the Conservation Area;

**Policy SCLP12.19: Brightwell Lakes**

Representations from Historic England (Rep ID: 1085) state that neither the policy nor the supporting text reference the scheduled bowl barrows and pill box within the site nor the bowl barrows in close proximity to the site. Inspector’s question 3.24 asks whether the policy would be effective in conserving the significance of the Scheduled Monuments within and close to the site. The modifications below would resolve this issue.

**Changes to supporting text**

**Modification to Paragraph 12.185:**

There are Scheduled Monuments within and in close proximity to the site, including a scheduled bowl barrow and pill box, and development will need to ensure that these are protected. Provision of a Heritage Park, in substantial accordance with the design principles of the concept diagram (Drawing No: 3167712) conditioned with the outline permission (DC/17/1435/OUT), will help to ensure development respects the historic environment. The design principles set out in the aforementioned concept diagram aim to create an attractive formal park style setting to heritage assets overlooked by homes while maintaining key views through the development.
Changes to policy

Modification to policy SCLP12.19 through inclusion of a new criterion:

q) Provision of a Heritage Park to preserve the significance of the Scheduled Monument bowl barrow and non-designated heritage assets along with protection of other Scheduled Monuments on and surrounding the site.

Policy SCLP12.20: Land at Felixstowe Road

Representations from Historic England (Rep ID: 1087) state that neither the policy nor the supporting text reference the nearby cluster of scheduled bowl barrows which are part of the Seven Hills barrow cemetery. The modifications below would resolve this issue.

Changes to supporting text

Modification to Paragraph 12.191:

The business park should include a focal outside area containing public seating and public art. To support the green infrastructure throughout the site, significant landscaping will be required to reduce the visual impact of the business park and ensure it is a complementary neighbour to the Crematorium and Scheduled Monuments adjacent. Opportunities should also be explored to integrate and connect landscaping to the existing Public Rights of Way Network in the area. The site is surrounded by known archaeological sites recorded in the Historic Environment Record, and to the west, cropmarks include a Bronze Age barrow cemetery of at least four barrows, likely associated with the wider group of Scheduled Monuments at Seven Hills, which is of outstanding local importance. Suffolk County Council have highlighted that an Archaeological Assessment is to be undertaken at an appropriate design stage prior to the granting of outline, technical details or full planning permission to inform viability of schemes, mitigation requirements and conservation in situ of significant remains.

Changes to policy

Modification to policy SCLP12.20 – fourth paragraph:

Exceptional design will be expected to provide a high quality and well screened business destination appropriate to the site’s location in the setting of the AONB and the nearby cluster of Scheduled Monuments that form part of Seven Hills barrow cemetery, in terms of scale, massing, materials and lighting.

Policy SCLP12.24: Land at Humber Doucy Lane
Historic England representations (Rep ID: 1089) state that there is no policy reference to neighbouring Listed Buildings. The modifications below would resolve this issue.

**Changes to supporting text**

**Modification to paragraph 12.212:**

The area of land in Ipswich Borough includes the land to the immediate south west of the site and the land to the immediate north west of the site. Development should also seek to preserve the significance of the Listed Buildings to the north and east of the site. These are Allens House, Laceys Farmhouse, and the Garden Store north of Villa Farmhouse.

**Changes to policy**

**Modification to policy SCLP12.24 through an additional criterion:**

h) Design, layout and landscaping of the development should be carefully designed to preserve the setting of the nearby listed buildings.

**Policy SCLP12.25: Suffolk Police HQ, Portal Avenue, Martlesham**

Historic England representations (Rep ID: 1092 and 1093) state that there is no reference to the three scheduled monuments that border the site. Inspector’s question 3.32 asks whether the policy would be effective in conserving the significance of designated heritage assets. The modifications below would resolve this issue.

**Changes to supporting text**

**Modification to paragraph 12.230:**

This site affects an area of extremely high archaeological significance and potential, on the former Martlesham Heath in the area of a series of at least eight Bronze-Age/prehistoric barrows which are either extant monuments or cropmarks. Three of the aforementioned eight bowl barrows are Scheduled Monuments and are outside but in close proximity to the site boundary to the north and west. The centre of the site includes below ground remains of one of these eight bowl barrows.

**Changes to policy**

**Modification to policy SCLP12.25 through an additional criterion:**
m) Design, layout and landscaping to respect the site’s close proximity to three Scheduled Monuments, and a Bowl Barrow on site.

Policy SCLP12.29: South Saxmundham Garden Neighbourhood

Representations from Historic England (Rep ID: 1080 and 1082) stated that as the Heritage Impact Assessment had not been reviewed they were unable to state whether opportunities to avoid harm had been taken and suggested that there may be specific mitigation recommendations that could form part of the policy.

Changes to supporting text

Modification to paragraph 12.186:

The Heritage Impact Assessment advises that built development in this part of the site should be avoided. Proposals on the site would need to consider their impact on heritage assets and their settings, including those identified in the Heritage Impact Assessment; Grade II* Listed Church of St John the Baptist, Grade II Listed Hurts Hall, Saxmundham Conservation Area, Grade II Listed Crown House, Grade II Listed The White House, Grade II Listed Monks Cottages, and Grade II Listed Benhall Stores.

Changes to policy

Modification to criterion j) of Policy SCLP12.29:

j) Design and development of the site which, having regard to the Council’s South Saxmundham Garden Neighbourhood Heritage Impact Assessment, is sympathetic to the south entrance of Saxmundham, the Conservation Area and heritage assets, and views of the sensitive landscape and heritage setting to the east, as informed by heritage impact assessment will be required;

Policy SCLP12.32: Former Council Offices, Melton Hill

Historic England representations (Rep ID: 1108 and 1109) raise concern about the prominent location both the site has in relation to neighbouring heritage assets and landscape. Inspector’s question 3.44 asks whether the policy would be effective in conserving the significance of designated Heritage Assets. The modifications below would resolve this issue.

Changes to supporting text

Modification to paragraph 12.336:

The design of the development will need to be distinctive and innovative whilst appropriate in terms of the proximity to the Grade II Listed Maltings Cottage and Woodbridge
Conservation Area as well as the Area of Outstanding Natural Beauty and the prehistoric settlement and group of barrows at Sutton Hoo.

Policy SCLP12.34: Strategy for the Rural Areas

Historic England representations (Rep ID: 1073) states that the approach to the portraits of the area is more generic when applied to the rural areas. The modifications below would resolve this issue.

Changes to supporting text

Modification to paragraph 12.366:

The vernacular architecture of the Suffolk claylands is well represented by a plethora of early manor houses, moated sites and 16th and 17th timber framed farmhouses with associated ranges including bakehouses, barns and granaries that were built using locally derived materials: hedgerow tree species, clay peg tiles and pantiles, thatch and lime render and early examples of brick. Examples of these building materials can be found in villages across the District complemented by the use of reed thatch in coastal areas.

Schedule of representations not subject to a modification

The Historic England representations below are not seeking modifications to the Plan and are therefore not covered by this Statement (Rep ID: 1042, 1043, 1071, 1044, 1112, 1045, 1083, 1034, 1040, 1047, and 1041).
Signatures

Signature:  
Print name: Philip Ridley  
Position: Head of Planning and Coastal Management  
Authority: East Suffolk Council

Signature:  
Print name: Dr Natalie Gates  
Position: Team Leader - Partnerships  
Authority: Historic England