



Historic England

Hilary Hanslip
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Planning Policy and Delivery Team
Suffolk Coastal and Waveney District Councils
Council Offices
Melton Hill
Woodbridge
Suffolk
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Our ref:
Your ref:
Date: 31 August 2016

By email to: Hilary.hanslip@eastsoffolk.gov.uk

Dear Ms Hanslip

Ref: Submission consultation on Framlingham Neighbourhood Plan

Thank you for consulting Historic England on the submitted Framlingham Neighbourhood Plan. Historic England is primarily concerned with the impact of the Plan on the historic environment and our comments will therefore focus on those aspects of the Plan. We attach for your information a copy of our response to Framlingham Town Council at pre-submission consultation stage at the end of this letter. Our comments below should be read alongside our previous letter.

The challenges, vision and objectives are set out on pages 18 to 21 of the Plan. We remain disappointed that the requirement in Paragraph 126 of the National Planning Policy Framework (NPPF) to set out a positive strategy for the conservation and enjoyment of the historic environment is not reflected in the Vision Statement and Objectives for Framlingham. We would expect that preserving and enhancing the historic environment would be an essential element of the Plan, given the challenges and vision as set out in the Plan. We also would note a small change to paragraph 2.2 – omitting ‘ancient’ from ‘scheduled ancient monument’.

We are concerned about the absence of an historic environment policy and the reliance on the local plan, paragraph 5.18. As set out in our Hearing Statement relating to your Site Allocations and Area Specific Policies DPD, Historic England understands that you are proposing to replace or delete a number of policies from the 2001 Local Plan as part of the Core Strategy including policies:



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- AP1 Conservation Area – control of development and enhancement
- AP4 Historic parks and gardens
- AP28 Areas to be protected from development

Whilst replacement policies are proposed for policies AP4 and AP28, there does not appear to be a replacement for the Conservation Area policy. We advise that there is not a sufficiently strong, robust strategy for the historic environment and a lack of specific historic environment policies relating to conservation areas, listed buildings, scheduled monuments and archaeology etc., either within Suffolk Coastal's submitted Plans or the Core Strategy itself. Therefore, the absence of a positive strategy for the historic environment in Framlingham's Neighbourhood Plan, as required by paragraph 126 of the NPPF, is extremely concerning given its reliance on the Local Plan to provide a local framework for heritage.

We welcome the policy and supporting text on residential design (FRAM4). With the policy on low energy design and construction (FRAM5), we are surprised that there is no consideration for alterations to listed buildings, buildings in conservation areas and scheduled monuments which are exempted from the need to comply with energy efficiency requirements of the Regulations where compliance would unacceptably alter their character and appearance. Special considerations under Part L are also given to locally listed buildings, buildings of architectural and historic interest within registered parks and gardens and the curtilages of scheduled monuments, and buildings of traditional construction with permeable fabric that both absorbs and readily allows the evaporation of moisture. Any policy encouraging energy efficiency should note that the application will be different in relation to these classes of buildings, particularly where there is an identified action (page 71, considered 'non-policy') to identify and encourage specific initiatives to improve energy efficiency in older houses. Further information can be found in the Historic England advice *Energy Efficiency and Historic Buildings – Application of Part L of the Building Regulations to historically and traditionally constructed buildings* <https://content.historicengland.org.uk/images-books/publications/energy-efficiency-historic-buildings-ptl/eehb-partl.pdf/>

We welcome the identification of important views as part of policy FRAM6. We also welcome the identification of locally important green spaces and policy FRAM7. One of the Local Green Spaces (Black Meadow – see page 36) is located within Framlingham Castle scheduled monument to the north of the Castle. We would recommend that the undeveloped rural character of this green space is retained and, where possible, the significance of the scheduled monument is enhanced. The area should not be used for play areas, courts, hard standing or other infrastructure. Any such works would require Scheduled Monument Consent.

We recommend corresponding identification and policy for locally important heritage assets. This is particularly important at the Neighbourhood Plan level as your authority is yet to create a list having adopted the criteria for buildings in October 2015 and refers to Supplementary Planning Guidance on Historic Parks and Gardens from December 1995 for



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the list of non-registered parks. Historic England has published Advice Note 7 on local listing: <https://www.historicengland.org.uk/images-books/publications/local-heritage-listing-advice-note-7/> which you may find helpful.

We welcome the identification of the character and appearance of the conservation area and the setting of listed buildings in policy FRAM14 on tourism. However, we would note that this should also consider scheduled monuments and the landscape setting of Framlingham, as per policy FRAM6. We would note that consideration of the setting of heritage assets could be made explicit in each of the site allocations. This is particularly relevant to FRAM24, FRAM28 and FRAM29.

For all the policies we would reiterate our earlier recommendation that consideration is given to reproducing or otherwise incorporating into the Plan the map entitled '*Summary of Character Features –Framlingham Conservation Area*' from the Framlingham Conservation Area Appraisal. This map helpfully sets out the boundaries of the conservation area, the listed buildings, unlisted buildings that make a positive contribution, important open/green/tree spaces, the scheduled area of the castle, historic environment record sites, important views, definitive footpaths and important walls.

Finally, we should like to stress that this opinion is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise where we consider that these would have an adverse effect upon the historic environment.

We hope that the above comments of assistance. Please let me know if you have any queries.

Yours sincerely

Dr Natalie Gates

Principal, Historic Places Team



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Eileen A Coe
Town Clerk
Framlingham Town Council

Our ref:
Your ref:
Date: 27 August 2015

Dear Ms Coe

Ref: Pre Submission Consultation on Draft Framlingham Neighbourhood Plan,

Thank you for consulting Historic England on the pre submission draft of your Neighbourhood Plan. Historic England is primarily concerned with the impact of the Plan on the historic environment and our comments will therefore focus on those aspects of the Plan. Several of the points we raise will be similar to the concerns we raised to Suffolk Coastal Council when responding to their consultation on the Sustainability Appraisal Scoping Report for this Plan.

The introduction to the Plan contains a section on Location and History, which makes reference to the Castle, though it would be helpful to note that the Castle is now a Scheduled Monument and Listed at Grade I. The reference to the town centre being designated a conservation area and containing 74 listed buildings is also helpful. It should also be noted that there are a number of listed buildings that lie within the parish, but are outside both the boundaries of the conservation area and town.

Pages 10 and 11 of the Plan set out the vision from Framlingham and the objectives for the Plan. Whilst this vision includes a reference to extending and enhancing the green environment, Historic England is disappointed that no similar reference is included to preserving or enhancing the historic environment, especially given the significance of the historic environment contained within the plan area. The objective for *'sensitive development which protects and enriches the landscape and built setting'* together with the objective to *'priorities local distinctiveness'* are again welcomed, but these do not explicitly protect the historic environment and we would wish to see more explicit acknowledgement of the importance of the historic environment to Framlingham, and a robust protection for the historic environment within the Policies of the Plan. As noted in our letter to Suffolk Coastal Council, both the 1990 Planning (listed buildings and conservation areas) Act and the National Planning Policy Framework (NPPF) set out expectations for the protection of heritage assets and it will be important for this Plan to be in conformity with those higher ranking documents. This might be done through expanding the section of the Plan entitled 'Renewables and Green Space' to cover all aspects of the Environment (the NPPF recognises that there are 3 components to the environment; the natural, built and historic environment). This might then provide the



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location to introduce a policy or policies providing specific protection to the historic environment along the lines of:

All new developments must safeguard the settings of designated heritage assets, and developments within or abutting the conservation area will be required to preserve or enhance the character and appearance of the Framlingham conservation area. When considering applications for replacement buildings in the conservation area, there will be a presumption in favour of retaining all buildings (listed and unlisted) that make a positive contribution to the conservation area. Developments that obstruct or appear over-prominent in the key views and vistas set out in appendix B of the Plan and the Important Views identified in the Conservation Area Appraisal will not be supported.

The Plan allocates a number of sites for specific purposes. None of these sites fall within the boundaries of the Framlingham conservation area, but two of the housing sites (H2 – Atlas Fram/New Road and H3 – Green Shed) abut the conservation area boundaries, and these in particular will require sensitive handling. We therefore welcome the principle H2 that requires new housing to be proportionate and appropriately scaled, along with H9 that requires the highest quality of design, but it will also be important for the new housing to be appropriately sited so that the right degree of enclosure is provided to the existing streets that face on to the conservation area.

Finally, we recommend that consideration is given to reproducing or otherwise incorporating into the Plan the map entitled ‘*Summary of Character Features – Framlingham Conservation Area*’ from the Framlingham Conservation Area Appraisal. This map helpfully sets out the boundaries of the conservation area, the listed buildings, unlisted buildings that make a positive contribution, important open/green/tree spaces, the scheduled area of the castle, historic environment record sites, important views, definitive footpaths and important walls. All of these contribute to the unique sense of place that the town processes and merit protection.

Please let me know if I can be of any further assistance in this matter.

Yours sincerely

David Grech
Historic Places Adviser



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