



ENGLISH HERITAGE

EAST OF ENGLAND

By email:
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Direct Dial: 01223 582746
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Our Ref: HD/P5382

Your Ref:

30th June 2014

For the attention of Mark Edgerley

Dear Mr. Edgerley

**PUBLIC CONSULTATION COMMUNITY INFRASTRUCTURE LEVY –
PREIMINARY DRAFT CHARGING SCHEDULE, STATEMENT OF
COMMUNITY INVOLVEMENT**

Thank you for requesting comments from English Heritage on the above two documents as per your letter dated 21st May 2014.

Our comments are as follows:

**COMMUNITY INFRASTRUCTURE LEVY – PREIMINARY DRAFT
CHARGING SCHEDULE**

English Heritage does not wish to make detailed comments on the level at which the Community Infrastructure Levy (CIL) charge is set for Suffolk Coastal District. We recognise, however, that it will be important to ensure that the charge does not have an adverse effect on the protection that the Council affords to designated and non-designated heritage assets and the historic environment within the district.

Suffolk Coastal District's designated heritage assets include 2,242 listed buildings, 115 scheduled monuments and 34 conservation areas.

The National Planning Policy Framework (NPPF) sets out a presumption in favour of sustainable development and clearly identifies the historic environment as a relevant matter for consideration in achieving this.

In certain contexts, it may be appropriate to consider exemptions or discretionary relief from CIL, where the viable future of a heritage asset is at issue, or its significance is threatened by intrusive development.

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We note that there is no reference in the Infrastructure Delivery Plan to Heritage; the Infrastructure Delivery Plan and Charging Schedule should include confirmation that heritage assets in Suffolk Coastal District will continue, for the present, to be eligible for s106 contributions; the important issue will be to ensure that this aspect is not vulnerable to being sacrificed as the last call on a prospective developer's financial contributions.

With regard to relief from CIL, we urge the Council to reserve the right to offer CIL relief for particular cases which affect heritage assets in order to avoid unintended harm to the historic environment through the application of CIL. For example, there may be instances where the requirement to pay CIL would threaten the viability of schemes designed to ensure the reuse of heritage assets identified as being 'at-risk' through enabling development.

We do not wish to object to the draft schedule, but hope that there will be opportunities for discussion and flexibility in the future where significant heritage issues arise, to ensure heritage protection is sustained in accordance with the NPPF.

We also strongly advise that local conservation staff are involved throughout the further preparation and implementation of the Draft Charging Schedule and the DPD as they are often best placed to advise on local historic environment issues.

STATEMENT OF COMMUNITY INVOLVEMENT

We welcome the reference to English Heritage as a statutory consultee under government regulations at Page 7 in the section on "Who the council will involve in the preparation of planning policy documents." There is a typo on this page, in the third paragraph, "know" should read "known."

We also welcome the accompanying reference to English Heritage in Appendix 1 as one of the "Specific Consultation Bodies."

The reference to English Heritage's status as a Duty to Co-operate stakeholder is also welcomed.

Aside from this, we do not wish to make any specific comments on the Statement of Community Involvement.

We look forward to continued consultation from the district council on relevant planning policy and planning application matters

Please do not hesitate to contact me if you wish to discuss any of these comments.

Yours sincerely

Mark White
Historic Environment Planning Adviser, East of England and East Midlands

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