



Historic England

Planning Policy and Delivery Team
Neighbourhood Plans
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NR33 0EQ

Our ref: 2016 06 20
Kessingland pre-
submission NP

Your ref: _____
Telephone _____

20th June 2016

By email only to: waveneylocalplan@eastsoffolk.gov.uk

Dear Ms Fox,

Kessingland Neighbourhood Development Plan 2016 – 2030 Pre Submission Consultation.

Thank you for your email of 16th May 2016 and submission of papers dealing with the Kessingland Neighbourhood Plan pre-submission consultation. Historic England has recently made a separate submission to the call for sites consultation undertaken by Waveney District Council in preparation for their new Local Plan.

Historic England is primarily concerned with the impact of proposals on the historic environment and our comments will focus on those aspects of the plan. We would confine our comments to this principal duty when considering planning policies and site allocations. The Neighbourhood Plan sets out to allocate sites to the north-west of the village.

Your Neighbourhood Plan includes a number of designated heritage assets including:

- Grade I Church of St Edmund on Church Road
- Grade II The Old Rectory on Church Road
- Grade II 59 High Street
- Grade II The Ark on London Road
- Grade II Pond Farmhouse on London Road

Historic England Comments

It is important that the Neighbourhood Plan safeguards those elements which contribute to the importance of historic assets. This will assist in ensuring they can be enjoyed by future generations of the area and make sure that the Neighbourhood Plan it is in line with national planning policy.

National Planning Practice Guidance (NPPG) is clear that where it is relevant, Neighbourhood Plans need to include enough information about local heritage to guide planning decisions and to put broader strategic heritage policies from the local authority's local plan into action at a neighbourhood scale. If appropriate this should include enough information about local non-designated heritage assets including sites of archaeological interest to guide decisions.

Historic England, Brooklands, 24 Brooklands Avenue, Cambridge CB2 8BU
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Historic England would wish to set out some proposed revisions to policy and text, for consideration prior to its final submission. These comments are made against the background that the Kessingland Neighbourhood Plan does allocate land for development.

Reference to Local Plan Policy

This section from paragraph 2.29 to 2.31 includes reference to strategic policies in the adopted Core Strategy. As you state the Neighbourhood Plan must be in general conformity with the Core Strategy. Policy CS 17 (Built and Historic Environment) applies in so far as the first line is concerned and where it states *'The District Council will work with partners and the community to protect and enhance the built and historic environment in the District'*.

We recommend the addition of this policy on page 16.

Neighbourhood Plan objectives paragraph 3.3.

Heritage assets are expected to be conserved and enhanced for generations to come. A positive strategy will address all the necessary means of achieving that end, the consequence of which may stretch into many other areas of land-use planning such as design, infrastructure and natural environment policies. The pre-submission Neighbourhood Plan would benefit from reference to this positive strategy in the Neighbourhood Plan objectives at paragraph 3.3 to include a new bullet that 'Heritage assets both designated and non-designated must be conserved in a manner appropriate to their special interest or significance and this includes the impacts of development within their setting'

This also links to policy SA1 which addresses the impacts of development on the setting of Pond Farm.

Section 6 Housing allocations.

The three proposed housing sites at SA1 (former Ashley Nurseries Site – also referred to as land at London Road), SA2 (land at Laurel Farm West and South) and SA3 (land at Laurel Farm East) are located to the north of the village. Housing development at SA 1 does have potential to affect the setting of the nearby Pond Farm and this is set out in policy SA1. Historic England would support the reference to setting and would also draw attention to our Good Practice Advice Note 3 (GPA3) which deals with the setting of heritage assets and which sets out a detailed approach for the assessment of setting upon the significance (special interest) of an affected heritage asset. Reference to this guidance would most appropriately sit within a footnote to paragraph 6.14 and with additional text to say 'attention is drawn to the Historic Environment Good Practice Advice Note produced by Historic England in collaboration with the Historic Environment Forum'.



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Glossary

We recommend glossary definitions that deal with heritage assets and include both designated and non-designated assets. We also recommend reference to the setting of a heritage asset (which can also be found in the National Planning Policy Framework). Historic England has a web resource that may assist here and this can be found at <https://historicengland.org.uk/advice/hpg/hpr-definitions/>

We hope that the above comments are of assistance.

Yours sincerely

Michael Stubbs

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