



Historic England

EAST OF ENGLAND OFFICE

Ms Laura Mundy
Suffolk Coastal and Waveney District Councils

Direct Dial: 01223 582746

Our ref: PL00043162
24 August 2017

Dear Ms Mundy

Re: Neighbourhood Plan for Wenhaston with Mells Hamlet 2017- 2031

Thank you for consulting Historic England about your Neighbourhood Plan. As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process. Therefore we welcome the opportunity to comment on the Submission Draft of the Wenhaston with Mells Hamlet Neighbourhood Development Plan (NDP).

In general, we welcome this comprehensive and informative NDP document. In line with National Planning Policy Framework (NPPF) policy for plan making (Paragraph 157), neighbourhood development plans should contain a clear strategy for the enhancement of the historic environment throughout. We are pleased to note therefore that the heritage of Wenhaston and Mells Hamlet is well represented throughout the document. However, we are disappointed that our previous advice to include a map of the parish which includes designated and proposed non-designated heritage assets has not been taken account of, and would stress again how useful such a map would be in properly identifying these assets within your plan.

We welcome Policy WwMP4, which aims to conserve the fabric and setting of heritage assets which are potentially affected by energy efficiency measures. We recommend, however, that this policy is reworded as follows to ensure compatibility with the NPPF: *"...will be accompanied by an assessment to ensure that any harm to heritage significance caused by proposed energy efficiency measures is clearly and convincingly justified"*. We would also recommend that reference is made in the supporting text to the policy that listed buildings, buildings in conservation areas and scheduled monuments are exempted from the need to comply with energy efficiency requirements of the Building Regulations where compliance would unacceptably alter their character and appearance, or harm their significance. Special considerations under Part L of the Regulations 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.

Further information can be found in the Historic England advice Energy Efficiency and



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Historic Buildings - Application of Part L of the Building Regulations to historically and traditionally constructed buildings, which is available to download here:

<https://historicengland.org.uk/images-books/publications/energy-efficiency-historic-buildings-ptl>, and a link to which we recommend is included in the NDP.

The neighbourhood plan process offers the opportunity for a community to assess whether there are local features and/or buildings that significantly contribute to Wenhaston's unique historic character, and afford them a level of protection and consideration in decision taking. We are therefore pleased to note the presence of the section identifying local non-designated heritage assets in the neighbourhood area, and the inclusion of the potential for adding more to the list as they are discovered. Historic England's guidance on Local Listing can be found here: HE Advice Note 7 - Local Listing: <https://www.historicengland.org.uk/images-books/publications/local-heritage-listing-advice-note-7/>.

Recognizing all the heritage assets within the neighbourhood area in this way contributes to the NDP's effectiveness in ensuring their conservation or enhancement, especially if any of those heritage assets are currently at risk. If any of the designated or non-designated heritage assets in the plan area are presently considered to be at risk, we would recommend that you consider including a strategy for their enhancement in the NDP.

With regard to non-designated heritage, we also welcome Policy WwM P12 which specifically deals with non-designated heritage assets. We recommend, however, that the last section of this policy is re-worded as follows to bring it in line with the NPPF: *"Planning applications affecting these assets would be required to provide a heritage statement demonstrating that the potential harmful impacts to the asset's significance have been clearly identified, avoided or minimised where possible. Where harm remains, applications are required to provide clear and convincing justification for any harmful impacts on significance."*

The conservation officer at Suffolk Coastal District Council is the best placed person to assist in the development of your Neighbourhood Plan. They can help you to consider how the strategy might address the area's local heritage assets. Your local authority might also be able to provide you with general support in the production of your Neighbourhood Plan. National Planning Practice Guidance 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.

We would also recommend that you speak to the staff at Suffolk County Council who look after the Historic Environment Record and give advice on archaeological matters.



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They should be able to provide details of not only any designated heritage assets but also locally-important buildings, archaeological remains and landscapes. Some Historic Environment Records may also be available on-line via the Heritage Gateway (www.heritagegateway.org.uk <<http://www.heritagegateway.org.uk>>). It may also be useful to involve local voluntary groups such as the local Civic Society, local history groups, building preservation trusts, etc. in the production of your Neighbourhood Plan.

Further information and guidance on how heritage can best be incorporated into Neighbourhood Plans has been produced by Historic England. This signposts a number of other documents which your community might find useful in helping to identify what it is about your area which makes it distinctive and how you might go about ensuring that the character of the area is retained. These can be found at:-

[<http://www.historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>](http://www.historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/)

With regard to terminology and definitions, we recommend the inclusion of a glossary containing relevant terminology contained in the NPPF, in addition to details about the additional legislation and policy protections that heritage assets enjoy.

In general, where referring to 'heritage and conservation', we recommend using the terminology 'historic environment', in line with the NPPF.

We would also suggest that the NDP provides links to these relevant Historic England documents:

HE Advice Note 2 - making changes to heritage assets:

[<https://historicengland.org.uk/images-books/publications/making-changes-heritage-assets-advice-note-2/>](https://historicengland.org.uk/images-books/publications/making-changes-heritage-assets-advice-note-2/)

HE Good Practice Advice in Planning 3 - the setting of heritage assets:

[<https://content.historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/gpa3.pdf/>](https://content.historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/gpa3.pdf/)

Finally, we should like to stress that this advice is based on the information provided by Suffolk Coastal Council in the email of 19 July 2017. To avoid any doubt, this does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed NDP, where we consider these would have an adverse effect on the historic environment.

If you have any queries about this matter or would like to discuss anything further, please do not hesitate to contact me.



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Yours sincerely,

Edward James
Historic Places Advisor, East of England
Edward.James@HistoricEngland.org.uk



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