

Historic England

Ms Felicia Blake
Ipswich Borough Council
Grafton House
15 - 17 Russell Road
Ipswich
Suffolk
IP1 2DE

Our ref: PL00121006

2 March 2020

Dear Ms Blake

Ref: Ipswich Borough Council Local Plan Core Strategy and Policies Development Plan Document Review - final draft, and Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document Review - Final Draft (January 2020)

Thank you for consulting Historic England on the Ipswich Borough Council Local Plan Core Strategy and Policies Development Plan Document Review - final draft, and Site Allocations and Policies (incorporating IP-One Area Action Plan) Development Plan Document Review - Final Draft (January 2020). As a statutory consultee, our role is to ensure that the conservation of the historic environment is fully integrated into planning policy and that any policy documents make provision for a positive strategy for the preservation and enjoyment of the historic environment.

Our comments below should be read with reference to our previous response dated 13th March 2019.

SUMMARY

Under paragraph 35 of the National Planning Policy Framework ('The Framework') we consider that this Plan is unsound as some aspects are not effective, or consistent with national policy. We have identified in detail below where we find the Plan unsound and what measures are needed to make the Plan sound. In particular we have recommended the inclusion of specific policy references for heritage assets and identified mitigation within Policies SP2 (Land Allocated for Housing), SP4 (Opportunity Sites), SP5 (Land Allocated for Employment Use), SP11 (The Waterfront), SP12 (Education Quarter), and SP13 (Portman Quarter).

DETAILED COMMENTS

Policy CS2: The Location and Nature of Development

Policy CS2: The Location and Nature of Development outlines how the sustainable



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growth and regeneration of Ipswich will be achieved. This includes focussing new residential development and community facilities into the town centre, the Waterfront, Portman Quarter, and Ipswich Garden Suburb and into or within walking distance of the town's district centres, and supporting community development, which we support. We note the reference to higher density homes, which is understandable in an urban setting, but are concerned that the term is treated as a synonym for tall buildings / flats. This appears to be confirmed in the final paragraph of Policy CS2 which states: *"In the interests of maximising the use of previously developed land, development densities will be high in the town centre, Portman Quarter and Waterfront, medium in the rest of IP-One and in and around the district centres, and low elsewhere, provided that in all areas it does not compromise heritage assets and the historic character of Ipswich."*

The inference here is that 'high density' could 'comprise' the historic character of Ipswich, presumably by way of tall buildings affecting the setting of these assets, impacting on their significance.

While we welcome the aspiration that densities should not compromise heritage assets and the historic character of Ipswich, we consider that this section on densities needs to be clarified, and 'high', 'medium' and 'low' densities defined. The policy should also make it clear that good design should not only respect the historic character of an area, but respond to it. High density does not need to take the form of flats, and we would refer you to our 'Increasing Residential Density publication from 2018:

<https://historicengland.org.uk/images-books/publications/increasing-residential-density-in-historic-environments/>

Indeed the presence of heritage assets does not automatically preclude high density development, and high density development is often compatible with the character of an historic place and can provide an opportunity to reconnect a fractured, fragmented or damaged historic townscape. CS2 as currently drafted could preclude such development.

Policy CS3: IP-One Area Action Plan;
SP2: Land Allocated for Housing;
SP4: Opportunity Sites;
SP5: Land Allocated for Employment Use;
Policy SP11: The Waterfront;
Policy SP12: Education Quarter; and
Policy SP13: Portman Quarter

We are extremely concerned about the lack of clarity regarding the status of the IP-One Area Action Plan, the lack of clear delineation of the opportunity areas, and the absence of robust policies for these which in our view renders this aspect of the Plan



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not effective, and therefore unsound. The IP-One Area covers the historic core of Ipswich, and contains the highest concentration of the town's designated heritage assets. Ipswich is particularly special in that it has origins as one of only four international ports in the Middle Saxon period. As a major Anglo-Saxon centre engaged in long-distance trade, it has an internationally important archaeological record from this time. The town's early fortunes were linked to the developing Anglo-Saxon kingdom of East Anglia, and *Gipeswic* was a likely trading settlement founded by the Royal House, notably associated with the burial ground at Sutton Hoo. The area also includes a number of notable listed buildings, as well as parts of several Conservation Areas. The appropriate management of the historic environment will therefore be a significant consideration in the design and deliverability of new development within the IP-One area, and it is therefore critical that the Plan provides a clear framework against which future development proposals can be assessed to ensure that these important assets are conserved and enhanced in line with the requirements of the NPPF.

Status of the IP-One Area Action Plan

Policy CS3: IP-One Area Action Plan discusses the IP-One Area Action Plan, and advises that the Council will "prepare and implement an IP-One Area Action Plan" and goes on to state that the Area Action Plan will include policies, which amongst other things will "define the extent of the Waterfront and the Portman Quarter", "allocate sites for development", "set down development principles", and identify heritage assets which development should have regard to" etc. The way this section is currently drafted suggests that this work has yet to be completed, and that in due course a new Area Action Plan will be prepared, clarifying the opportunity area boundaries, and setting out detailed policy criteria against which development proposals will be tested. However, following conversation with the Council we now understand this not to be the case, and in fact that the IP-One Area Action Plan has already been finalised and incorporated into the current Site Allocations and Policies DPD review (January 2020). We therefore find Policy CS3 highly confusing and misleading. Our main concern is that the Plan should be readable and useable. This document is likely to be read by developers, home owners and other planning professionals, and in places (most notably those sections discussing the IP-One Area) it is extremely difficult to follow. If it is the case that the IP-One Area Action Plan has been completed and is incorporated into the Regulation 19 Plan, then Policy CS3 and supporting text need to clearly state this. Notwithstanding this, it is our contention that the Council has not followed CS3 in that it has not clearly defined the extent of the opportunity areas (Policy CS3, criteria a), has not set down the development principles which will be applied to new development (Policy CS3, criteria c), and has not identified the heritage assets which development proposals will need to have regard to and integrate new development with the existing townscape (Policy CS3, criteria e). These issues are discussed in detail below.



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Delineation of Opportunity Areas

With regards the delineation of the opportunity areas, it is unclear which boundaries the Council is promoting through this Plan, and which areas are covered by Policies SP11, SP12, and SP13. The Policies Map IP-One Area inset and Chapter 6 of the Plan shows detailed boundaries for eight opportunity areas, namely:

- Opportunity Area A - Island site;
- Opportunity Area B - Merchants Quarter;
- Opportunity Area C - Mint Quarter and surrounding area;
- Opportunity Area D - Education Quarter and surrounding area;
- Opportunity Area E - Westgate;
- Opportunity Area F - River and Princess Street Corridor;
- Opportunity Area G - Upper Orwell and Canal side; and
- Opportunity Area H - Holywells

However, these areas do not appear to match up with the illustrative boundaries given in Diagram 3: The Ipswich Key Diagram, or the names for these areas given in Policies SP11 (The Waterfront), SP12 (Education Quarter), and Policy SP13 (Portman Quarter). This is important because as drafted it is unclear whether for example, SP11 (The Waterfront) comprise and covers the full extent of Opportunity Area A - Island Site, and Opportunity Area B - Merchants Quarter as illustrated in Chapter 6 etc. For the Plan to be effective the opportunity areas need to be clearly defined and labelled on the policies map, so that it is clear which policy and supporting text relates to which area, and the extent of the land in question.

Policy coverage and a lack of robust wording to guide development

We consider that there needs to be greater clarity within the Plan regarding the status of the IP-One opportunity areas. Chapter 6 of the Site Allocation document provides further information on the opportunity areas, setting out development principles for each area, which we welcome. However, these principles are not set out in policies SP11, SP12, and SP13, and it would appear that the other opportunity areas in this section of the Plan (see our comments regarding the mismatch of opportunity areas above) don't have policies at all. Nor are they set out in Policies SP2: Land Allocated for Housing, SP4: Opportunity Sites, or SP5: Land Allocated for Employment Use. It is therefore unclear what status these development principles have in the context of decision-making. This issue is further confounded when the Local Plan allocations are factored in. Paragraph 6.1 of the Plan makes it clear that the individual allocation policies take precedence over the Opportunity Area guidance and site sheets for an individual area. This does not give a consistent vision for each area with clarity for a developer on what development to bring forward or the ability for the Council to set out what development will meet the aspirations for the area. This is particularly critical for non-allocated sites, where there is an inherent risk that speculative applications may



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come forward with no overarching framework to guide development.

We understand that the Council considers that the Plan should be read as a whole and on this basis they consider that it is not necessary to include these criteria within policies SP2, SP4, SP5, SP11, SP12, and SP13. Whilst we appreciate that the Plan should be read as a whole, awareness of the relevance of the historic environment is often limited and could be missed, and so it should be made clear to the decision maker how they should react and which other Local Plan policies, SPDs and guidance apply as per NPPF paragraph 16d and 20d. Ideally this is best achieved through one policy for each opportunity area which specifically sets out the main criteria and parameters for that land. Robust site specific policies will help to articulate the vision for each opportunity area, setting out the means to improve connectivity, legibility, and ones experience of historic places, and help to ensure the key design and heritage principles are employed consistently and to a high quality. It would also help the Council to meet Paragraph 185 of the NPPF which requires Local Plans to set out a positive strategy for the historic environment.

We request that you review the wording for these policies again; identifying which heritage assets (or their settings) would be affected by the proposed development. Where a potential impact is identified, wording should be included in the policy and supporting text to this effect. This wording should incorporate the design principles set out in Chapter 6 of the Plan, and should include/draw on/reference, where relevant the Archaeological Character Zone by Archaeological Character Zone recommendations set out in Appendix 3 of the Council's Development & Archaeology supplementary planning document (SPD) (November 2018), as well as the Council's Urban Character SPD. This will make it clear to developers how they are expected to respond to the varied and often complex heritage issues which have been identified, and ensure a unified design response to avoid any sense of piecemeal and un-co-ordinated development. It may also be beneficial to elevate the Development Options plans (i.e. those illustrating the development options and design guidelines) from chapter 6 into the policies to ensure that they are given adequate weight in the decision-making process. Without this information the policies as drafted are not effective and therefore unsound.

Other allocations sites with heritage issues

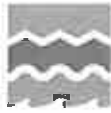
We draw your attention to the land allocated for future housing growth & associated infrastructure improvements known as ISPA4.1. This site includes the Grade II Listed Everton School Westerfield House in the north-western portion of the site, and is adjacent to/within the wider setting of other Grade II Listed buildings, notably Allens House, and Laceys Farmhouse which lie just outside the allocation boundary to the east. Development will need to preserve and where possible enhance these assets and their settings where this setting contributes to their significance. Given the proximity of these assets we would expect to see a Heritage Impact Assessment



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prepared to inform the redevelopment of this area. This document will need to assess the contribution which this land makes to those elements which contribute towards the significance of the heritage assets (designated and non-designated), and determine what impact its development might have upon their significance. Any specific measures required to remove or mitigate any harm to these assets should then be included in a site specific policy for ISPA4.1.

Policy CS4: Protecting our Assets

We welcome the changes to criterion 3 regarding the Council's commitment to a local list in policy.

Policy DM15: Tall Buildings

We welcome the changes to Policy DM15, but request that criterion 'i' is amended to read:

Preserves strategic and local views, with particular reference to the settings of conservation areas, listed buildings, scheduled monuments, and other heritage assets, and the wooded skyline visible from and towards central Ipswich.

We remain concerned that the tall building arc identified on the IP-One Policies Map still includes a significant area within the setting of the Grade I Listed Willis Building. Designed by Norman Foster in 1970-71 as a headquarters for global insurance broker Willis, Faber and Dumas (known as Willis in 2012), it is exceptional as the first large, multi-level building by one of Britain's most significant modern architects hailed internationally shortly after completion and recognised by architectural awards. One of its most striking features is its curvilinear glass curtain walling that reflects the surrounding buildings. Any new tall building therefore has the potential to impact on the setting, and therefore significance of this important building, and on this basis we advise pulling back the arc boundary in the immediate vicinity to avoid these potential impacts. Our Tall buildings advice note provides more information on taking an informed approach to tall building policy writing, using understanding of local character, distinctiveness and the significance of heritage assets, as well as pertinent issues. You can access it by following the link below:

<https://historicengland.org.uk/images-books/publications/tall-buildings-advice-note-4/>

Policy DM13: Built Heritage and Conservation

We note the changes to this policy following our Regulation 18 advice.



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Policy DM14: Archaeology

We welcome the changes to this policy following our Regulation 18 advice.

Conclusion

Please note that absence of a comment on a policy, allocation or document in this letter does not mean that Historic England is content that the policy, allocation or document is devoid of historic environment issues.

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.

Yours sincerely,

Andrew Marsh
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