



Ipswich Borough Council
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Our ref: PL00121006

17 September 2021

Dear

Re: Ipswich Local Plan Review 2018-2036 Proposed Main Modifications

Thank you for consulting Historic England on the Ipswich Local Plan Review 2018-2036 Proposed Main Modifications. As the Government's adviser on the historic environment, Historic England is keen to ensure that the protection of the historic environment is fully considered at all stages and levels of the local planning process.

We welcome the production of this consultation paper, but do not currently have capacity to provide detailed comments on every modification, and have instead focussed on those issues raised by Historic England in our Regulation 18 and 19 responses, and which have subsequently been resolved via the preparation of the our Statement of Common Ground, October 2020 (Document I30.1). I hope you find the following observations helpful.

GENERAL COMMENTS

We understand that the consultation comprises two main documents:

- (1) Core Strategy and Policies Development Plan Document Main Modifications; and
- (2) Site Allocations and Policies (Incorporating IP-One Area Action Plan) Development Plan Document Main Modifications

We welcome the various changes to the structure of the Plan which have substantially improved its legibility making it much easier to follow.

CORE STRATEGY AND POLICIES DEVELOPMENT PLAN DOCUMENT MAIN MODIFICATIONS



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We welcome the inclusion of the changes agreed through our Statement of Common Ground, October 2020 (Document I30.1). In particular the additional supporting text for Policy DM14 (Archaeology) highlighting the presence of Scheduled Monuments within Opportunity Areas A and B, and the addition of criterion 'I' in Policy DM15 (Tall Buildings) which now includes reference to scheduled monuments, and the importance of setting in considering impacts on the historic environment. We particularly pleased to see the amendment to the Tall Building Arc (reference PCM39) to pull back the arc boundary in the immediate vicinity of the Grade I listed Willis Building and the churchyards of St Peter's Church, St Mary at the Quay, and St Nicholas Churches.

Finally, we're pleased to see inclusion of revised policy wording and supporting text (paragraph 8.26) for Humber Doucy Lane (Policy ISPA4.1). We particularly welcome the references to the Council's Heritage Impact Assessment (HIA) and that proposals will have to demonstrate how the effects on heritage assets are taken into account and mitigated. We further support the reduction in site capacity from 496 to 449 dwellings.

SITE ALLOCATIONS AND POLICIES (INCORPORATING IP-ONE AREA ACTION PLAN) DEVELOPMENT PLAN DOCUMENT MAIN MODIFICATIONS

Again, we welcome the inclusion of the changes agreed through our Statement of Common Ground, October 2020 (Document I30.1). We particularly welcome the various revised policy wording and supporting text set out in Chapter 5 (Site Allocations and Policies) in relation to the historic environment within the IP-One Action Area. These modifications stipulate the approach to be followed with reference to both designated and non-designated heritage assets, making explicit where archaeological investigations and/or Heritage Impact Assessments will be required as part of the supporting evidence at the masterplanning/planning application stage. They also determine that the types and extent of archaeological remains will be a significant factor in informing the design, layout and construction methods of proposals. Historic England is satisfied that this additional work required can be undertaken prior to the determination of any planning application for these sites and will provide further feedback at the masterplanning and planning application stages of the development process.

We're also pleased to see the various references throughout the documents to the Council's substantial historic environment evidence-base, and Supplementary Planning Documents (SPDs). These include the Council's Conservation Area Character Appraisals for all the conservation areas including those within and adjacent to the IP-One Area, the Ipswich Urban Characterisation Study Supplementary



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Planning Document (which cover parts of the town outside the conservation areas to explore the character and interest of these areas and provide design guidance to support the management of future development), an Urban Archaeological Database and Development and Archaeology Supplementary Planning Document.

Overall Historic England is content that the modifications will ensure that adequate protection is given to the historic environment in and around the IP-One Area and are consistent with national policy.

CONCLUSION

Finally, we should like to stress that this response 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 as a result of this plan, where we consider that these would have an adverse effect upon the historic environment.

If you have any questions with regards to the comments made, then please do get back to me. I would be very happy to meet to discuss these comments further. In the meantime, we look forward to continuing to work with you and your colleagues. I would be grateful if you could confirm receipt of this letter.

Yours sincerely,

Historic Environment Planning Adviser, Planning Group



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