

A12-2: Historic England Statement of Common Ground

Historic England follow up email re SOCG/HIA, 28th March 2022

Good afternoon

Many thanks for meeting me this morning. It is good to see that we should be in position to progress the detailed Statement of Common Ground once the Local Plan Review has been submitted.

We can work on detailed responses to Historic England's Regulation 19 representation, post-submission. These broadly fit into two principal categories:

- Detailed wording for development management policies, to ensure compliance with the NPPF; and
- Undertaking a Heritage Impact Assessment to underpin the West Winch allocation (Policy E2.1).

Meanwhile, I look forward to catching up with you over the coming weeks and months as we work to resolve these outstanding issues.

Regards and best wishes

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From:

Sent: 28 March 2022 12:35

To:

Subject: SOCG/HIA

Dear

It was good to speak with you earlier regarding the Statement of Common Ground.

SOCG Next Steps

To summarise, in taking the SOCG forward I suggest that

- a) Remove refs to Environment Agency
- b) Section 4 and section 5. Use landscape format. Do a table with the following columns:
Policy/para no
HE Reg 19 Comments
KLWN Response (this should say whether you agree or disagree and if you are proposing changes o wording what those changes are

HE Response – leave this blank and I will fill this column in with whether I agree/disagree with your response.

Once we have completed the table it would be good to separate out the table into two tables where we agree and disagree (Areas of Common Ground, Areas of Uncommon Ground/Disagreement) to make it easy for the Inspector to hone in on the outstanding issues (if there are any – let's hope not!).

I suggest you involve your conservation officers in the drafting of the historic environment policy revisions. It needs to mention designated (Listed Buildings, Scheduled Monuments, Registered Parks and Gardens and Conservation Areas) as well as non-designated heritage assets. It needs to consider significance. It should also mention settings. The different tests for substantial and less than substantial harm as well as the different tests for different grades of assets need to be included. Heritage at Risk should also be covered.

More detail is needed for each of the comments made in our reg 19 response – a separate row in the table for each point.

West Winch HIA

For West Winch, we discussed the need for an HIA. This could either be done by consultants or in house (perhaps a combination of the policy team and conservation officers). It needs to be a proportionate approach. We appreciate the site is already allocated in the previous local plan but this is more about looking at what heritage assets there are in the area, thinking about what the impact of development might be on these assets and thinking about what mitigation enhancement measures might be needed and then using that information to inform the policy wording in the Plan.

The main requirements for HIA set out in our advice note HE Advice Note 3 – site allocations in local plans: <https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>

(see methodology on page 5) . There is no one set way to do an HIA – they need to suit the particular circumstances of the site, but they should follow the broad methodology.

In essence, it is important that you

- a) Identify any heritage assets that may be affected by the potential site allocation.
 - b) Understand what contribution the site makes to the significance of the asset
 - c) Identify what impact the allocation might have on that significance
 - d) Consider maximising enhancements and avoiding harm (mitigation)
 - e) Determine whether the proposed allocation is appropriate in light of the NPPFs tests of soundness
- In assessing sites it is important to identify those sites which are inappropriate for development and also to assess the potential capacity of the site in the light of any historic environment (and other) factors.

The report should explore what contribution the site makes to the significance of assets (including the contribution of setting to significance). It should then consider what potential impact the development of the allocation would have on the significance of assets. It should recommend potential mitigation and enhancement measures (ideally in bullet point form) so that these recommendations are very clear and can then be included in the Plan policy for the site.

Consideration should be given to height, density, capacity, open space, landscaping, materials, key views, buffers to protect heritage assets etc. A diagram can also be useful to illustrate these key recommendations and this diagram can then be included in the Plan.

It is really important that these recommendations are then used to formulate the policy criteria (not the other way round). And these recommendations should also inform the masterplan for the site. And of course the SOCG will also need to respond to this and include revised wording.

I attach a brief for an HIA which you might find helpful.

I also mentioned our general advice note on Local Plans which you will find here: HE Good Practice Advice in Planning 1 – the historic environment in local plans: <https://historicengland.org.uk/images-books/publications/gpa1-historic-environment-local-plans/>

I trust you will find this helpful and we look forward to continuing to work with you on the Plan.

I will be on leave from Wednesday 30th until 20th April. Do get in touch if any of the above is unclear. And I suggest we have another meeting when you have sent me the next draft of the SOCG.

Many thanks

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KLWN Local Plan - Statement of Common Ground with Historic England, 25th February 2022

Dear

It was good to speak to you on Wednesday regarding a potential Statement of Common Ground between Historic England and Kings Lynn and West Norfolk in relation to our representations on your Local Plan.

We are committed to working with you on a Statement of Common Ground over the coming weeks, prior to EiP hearings, and hope that we can seek to resolve the outstanding issues. This may be through revised policy wording to address our concerns.

In relation to West Winch, we have indicated that a Heritage Impact Assessment is required. We hope that this work can be completed prior to EiP hearings to inform any changes to policy wording.

We look forward to continuing to work with you on the Draft Local Plan.

Yours sincerely

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Historic England

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