

**STATEMENT OF COMMON GROUND BETWEEN ENGLISH HERITAGE
AND THE GEATER NORWICH DEVELOPMWENT PARTNERSHIP**

Joint Core Strategy for Broadland, Norwich and South Norfolk

November 2010

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Introduction

1. This Statement of Common Ground has been prepared by the Greater Norwich Development Partnership (GNDP). It relates to the representations in respect of the joint core strategy for Broadland, Norwich and South Norfolk (JCS) made at the Regulation 27 submission stage by English Heritage.
2. English Heritage made a number of representations at the regulation 27 stage. Some of these are no longer relevant, and some have been addressed through the schedule of minor changes proposed at submission by the GNDP.
3. This statement of common ground reflects the agreed position between the parties following an exchange of correspondence.

Events since Submission

Revocation of Regional Spatial Strategies

1. The principal relevant event since the submission of the JCS in March, 2010, was the decision by the Government, following the General Election, to revoke regional spatial strategies. In response, a number of drafting changes have been submitted to the inspectors before the JCS undergoes examination. As it would no longer be appropriate to include references to the East of England Plan, other than in a historic context, some of the representations submitted by English Heritage are no longer applicable.
2. This applies to the following representations
 - 11419 – supporting text to policy 9 – a reference to policy ENV6 of the East of England Plan is no longer appropriate
 - 11426 – policy 10: references – it is no longer appropriate to refer to policies ENV 6 and ENV 7 from the East of England Plan
 - 11428 – policy 11: references – it is no longer appropriate to include a reference to policy ENV six of the East of England Plan

In the case of 11426 and 11428 references should be included to PPS5 *Planning for the historic environment* to highlight the importance of the historic environment in the area covered by the core strategy policy.
3. The parties agree that these representations, or the parts relating to policies in the East of England Plan are no longer applicable, subject to appropriate references to PPS5 being included.
4. In the event that the inspectors consider references to the East of England Plan should be retained, the parties agree that a consistent approach should be taken, and that appropriate reference to policy ENV6 of the East of England Plan should be made.

Publication of PPS5 *Planning for the historic environment*, March 2010

5. On 23 March 2010 the Government published Planning Policy Statement 5 *Planning for the historic environment*. This supersedes national policy for the historic environment contained in PPGs 15 and 16.
6. The soundness of the Joint Core Strategy in relation to the historic environment should be assessed in the context of this newly

published national advice. The paragraphs and policies of PPS5 that have particular relevance are summarised below.

7. Paragraph 7 of PPS5 addresses the Government's objectives for the historic environment, which include:

- Ensuring that the positive contribution of heritage assets to local character and sense of place is recognised and valued
- Ensuring that consideration of the historic environment is integrated into planning policies promoting place-shaping

8. Policy HE2 Evidence base for plan making:

Local planning authorities should ensure they have evidence about the historic environment in their area. The level and detail of the evidence should be proportionate and sufficient to inform adequately the plan making process.

9. Policy HE3 Local Planning Approaches

- HE3.1 Local Development Frameworks should set out a positive proactive strategy for the conservation and enjoyment of the historic environment in their area. This should take account of (*inter alia*): its influence on the environment and an area's sense of place; its potential to be a catalyst for regeneration and the stimulus it can provide to inspire new development of imaginative and high quality design.
- HE3.2 The level of detail contained in a LDF should reflect the scale of the area covered by the plan and the significance of the heritage assets within it.
- HE3.4 At a local level plans should consider the qualities and local distinctiveness of the historic environment and how these can contribute to the development of the spatial vision in the LDF core strategy. Heritage assets can be used to ensure continued sustainability of an area and promote a sense of place.

10. Policy HE5 Monitoring indicators

Local planning authorities should consider how they can best monitor the impact of their planning policies and decisions on the historic environment. They should pay particular attention to the degree to which individual or groups of heritage assets are at risk of loss or decay.

11. The parties agree that PPS5 does not suggest major changes are necessary to the Joint Core Strategy, but consider that the increased emphasis on the role of heritage in place-shaping and the design of new development is a matter which should be accommodated through further minor changes.
12. English Heritage acknowledges and supports the Historic Charactersiation and Sensitivity Assessment 2009 undertaken by Norfolk County Council for the Greater Norwich Development Partnership. This provides additional strategic analysis of the historic environment in the plan area. The parties expect this to be used in the plan making process as it goes forward, supplemented by further characterisation, including conservation area appraisals. Taken together with the known designations in the area, we consider the requirements of PPS5, policy HE2, to be met.
13. The terminology used in PPS5, particularly the reference to heritage assets (defined in PPS5, para 5), suggests only minor changes to the Joint Core Strategy. The additional emphasis on monitoring also suggests minor changes to the Joint Core Strategy.

Schedule of Minor Changes

1. At submission, the GNDP submitted a schedule of proposed minor changes (submission document JCS 2) which included a number of suggested amendments where it was considered that the text of the JCS could be clarified or made more complete by changes which would not alter its fundamental intentions.
2. A number of these changes addressed points raised by English Heritage in whole or in part.
3. Relevant representations are
 - 11409 – spatial vision fourth bullet under “The urban area of Norwich”. The wording has been amended to omit the phrase “contemporary medieval city” in response to the concern expressed by English Heritage that the phrase is too limiting.
 - 11410 – spatial vision – towns villages and rural area – bullet 6. This has been amended to include a reference to “historic character and quality” as requested by English Heritage.
 - 11411 – policy 1 right hand column, last paragraph, line 5. The wording has been amended to refer to “the protection of their settings”. This incorporates some of the wording requested by English Heritage. It does not specifically refer to conservation areas, as these are considered by the GNDP to be covered through the phrase “wider historic environment”.
 - 11414 – policy 1 – references. A reference to the Historic Characterisation and Sensitivity Assessment has been added to the references in response to the representation by the English Heritage.
 - 11416 –policy 2-spatial planning objectives – spatial planning objective 9 has been added in response to the representation by English Heritage. Policy references – Historic Characterisation and Sensitivity Assessment has been added in response to the representation by English Heritage.
 - 11426 – policy 10 – references. Reference to PPGs 15 and 16 has been added in response to the representation by English Heritage. (
 - 11427 – policy 11 – bullet 1 – the words “contemporary medieval” have been omitted and the words “and its distinctive character, as identified in Conservation Area appraisals, through innovative” have been added in response to the representation by English Heritage.
4. The parties agree that in respect of representations 11409,11411 and 11416, the changes proposed partially meet the concerns expressed by English Heritage and that in respect of the other representations listed the changes proposed in the schedule of minor changes fully meet the concerns expressed by English Heritage, with the exception of new references to PPS5 proposed by English Heritage to which the GNDP agree.

Remaining Areas of Dispute and further minor amendments to reflect PPS5

Partially met representations and PPS5 changes

Representation 11409

English Heritage's suggested wording seeks both to emphasise the historic importance of Norwich and the need for new development to be sensitive to its context. We wish to maintain the last part of our representation which is appropriate in the context of the explicit advice in PPS5 objectives and policy (HE3.1 and 3.4), relating to sense of place, place-shaping and design.

Representation 11411

English Heritage agrees with the suggested GNDP change but requests that 'heritage features' be changed to 'heritage assets' to accord with PPS5 terminology. This also helps the sense of the paragraph since conservation areas are defined as heritage assets.

Representation 11414

English Heritage suggests that reference to PPS5 would also be helpful.

Representation 11416

English Heritage withdraws the recommendations for additions to the bullet points since these points are covered elsewhere. The GNDP change to include a reference to objective 9 at the end of policy 2 is welcome. English Heritage requests an additional reference to PPS5 on page 38.

Representation 11425

English Heritage welcomes the GNDP change to the key diagram which partially meets our concern.

Representation 11426

Reference to PPS5 should be made in place of the GNDP change referring to PPGs 15 and 16

Representation 11428

English Heritage recommends that PPS5 should be referred to instead of the East of England Plan.

Areas of Dispute

Representations 11406 and 11418

English Heritage wishes to maintain these representations relating to the distribution of housing numbers in the plan area and the need for further assessment if allocations are subject to flexible interpretation.

Representation 11429

PPS5 policy HE5 supports a strong monitoring framework. English Heritage would be pleased to discuss this further with GNDP.

Representations 11421, 11422, 11424

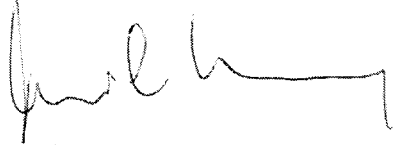
English Heritage wishes to maintain these representations.

Withdrawn representations: 11403, 11413, 11419

* Confirmation

The parties agree that this statement reflects their agreed position

Signed on behalf of Greater Norwich Development Partnership:




Position:

(STRATEGIC DIRECTOR AND CHIEF PLANNER, BROADLAND DISTRICT COUNCIL)

Date: 11/11/10

Signed on behalf of English Heritage:



Position:

Regional Planner, East of England.

Date: 11/11/10

* The wording of this statement was agreed prior to the recent judgement that Regional Strategies remain part of the development plan. The parties agree that the inspectors will need to take account of this.

