LP21 The Historic Environment

Object

Legally Compliant Y

Not Sound N

Duty To co-operate Y

The CN policies of the Babergh Local Plan and Core Strategy made commitments to respect, identify and preserve conservation areas as areas of significant local heritage and historic value. CN08 and CN09 provided specific guidance and in the explanatory texts associated with these at 7.43 other potential Conservation areas were identified.

*Possible areas for designation as conservation areas following detailed survey and consultation work are:*

*Boxted;*

*Chattisham;*

*Hintlesham (Church and Hall area);*

*Hitcham (around the Church);*

*Holbrook, (The Royal Hospital School Site);*

*Lawshall;*

*Lower Layham;*

*Milden Shimpling;*

***Sproughton (Lower Street);***

*Washbrook,(The Street);*

*Wattisham; and Wherstead.*

For some reason we aren’t aware of this does not appear to have been followed through for Sproughton before this point in time and it was not designated as such. Sproughton’s Neighbourhood Plan team is now pursuing this designation to protect the abundance of Listed, Old, Historically significant and historically linked buildings in the Villages Northern fringe and the historically linked green borders, Roman Road and historic waterway.

However we are amazed that there is not one word about Conservation Areas in policy LP21 which is supposed to replace the previous Heritage policies.

Policy LP21 is very subjective as are many of the new JLP policies which will give substantial ‘wiggle room’ to developers which may lead to unintended adverse consequences. We have seen application after application being questioned by our Planning Committee against present objective policies and being told by Planning Officers that those policies were difficult to defend in an appeal and therefore could not be used as the basis for a refusal. What possible chance is there of a subjective policy open to argument on opinion that doesn’t even mention Conservation Areas to offer any protection to unacceptable development in a conservation area.

As a policy to respect identified conservation areas, protecting and preserving the best of our developing heritage and local history this policy is inadequate and simply not sound or fit for purpose. Unless the underlying purpose is to abandon all but individual nationally listed heritage assets (National Monuments) ignoring and allowing to be destroyed historic assets that have value within an area.

**Summary**

LP21 replaces previous CN policies for Heritage and Conservation Area assets. However, it is subjective and therefore limitlessly arguable based on opinion, and therefore legal argument, especially in relation to Conservation Areas which are not even mentioned in the policy. This policy appears to offer no objective direction in relation to local heritage beyond the directions of the NPPF. So as a local policy it is of little purpose, not sound, subjective and weak providing little support or local guidance.

LP21 follows NPPF and other relevant legislation on their national standards but only sets local procedures for planning presentation to be considered subjectively on opinion which has no legally arguable strength. It provides no locally specific or objective guidance to support community and district aims or values. This policy needs to respect community values and identify the districts intentions for heritage preservation and provide defensible guidance for the electorate and decision makers in the planning process.