



Historic England

**Examination of East Cambridgeshire Plan**  
**Single Issue Review**  
**Historic England, Hearing Statement**

Question 21

Paragraph 3.5.6

October 2022

Historic England is the principal Government adviser on the historic environment, advising it on planning and listed building consent applications, appeals and other matters generally affecting the historic environment. Historic England is consulted on Local Development Plans under the provisions of the duty to co-operate and provides advice to ensure that legislation and national policy in the National Planning Policy Framework are thereby reflected in local planning policy and practice.

The tests of soundness require that Local Development Plans should be positively prepared, justified, effective and consistent with national policy. Historic England's representations on the Publication Draft Local Plan are made in the context of the requirements of the National Planning Policy Framework ("the Framework") in relation to the historic environment as a component of sustainable development.

# Historic England Hearing Statement

## Introduction

- 1.1 This statement addresses the Inspector's question 21 with regards paragraph 3.5.6 of the Local Plan.
- 1.2 This hearing statement should be read alongside Historic England's comments submitted at previous consultation stages of the Local Plan.

## Matters and Issues for East Cambridgeshire Local Plan Single Issue Review

### Issues

#### Q.21 Is paragraph 3.5.6 justified in relation to the stated status of the Broad Areas?

##### Summary

It is Historic England's view that paragraph 3.5.6 is not justified and is not consistent with national policy. The principle of development has not been established for all parts of the broad locations. Indeed, there are potential impacts on the historic environment (two grade II\* listed windmills) for two of these locations. These impacts should be explored through Heritage Impact Assessment.

#### **Paragraph 3.5.6 is not justified. The Principle of development has not been established for all parts of the broad locations.**

We note that the Council is proposing to state in the supporting text at paragraph 3.5.6 that the '**principle of development coming forward of the Broad Areas is now established**'.

We would question this statement. Whilst we appreciate that two of the five identified sites have recently received planning permission for development, that does not necessarily confer that the principle of development has been established on all broad location sites. Each site needs to be considered on its merits. And for at least two of the other sites in Soham there are potential heritage issues that need to be explored.

The fact that 5 broad locations had been identified in the 2015 Local Plan that '**COULD be developed in the future**' does not mean that they should or would be developed. Indeed, it would be possible to find that only, say, 4 were suitable but that the 1800 dwellings attributed to the broad locations in the housing supply table could be accommodated across a smaller number of locations.

#### **Potential impacts on the historic environment should be explored through Heritage Impact Assessments.**

Moreover, in our previous advice we had recommended that if there was an intention for the other two Soham sites to be allocated/developed then a Heritage Impact Assessment (HIA) should be prepared now as part of the Plan preparation process to consider the likely impact of development on the significance of the two grade II\* windmills, Northfield Windmill and Downfield Windmill, (including their settings), the suitability of the site, and any implications in terms of capacity, mitigation and enhancement needed.

If the sites were brought forward, then reference should be made in the policy and supporting text to the heritage assets and any necessary mitigation identified through the HIA.

To our knowledge these HIAs have not been prepared. In the absence of this evidence, there has been no detailed consideration of impacts on the historic environment.

This therefore further confirms our view that the principle of development across all of the Broad Areas has not been explored or established.

Therefore, in our view, the Plan is **not sufficiently justified.**, it is **not consistent with national policy** which states that heritage assets should be conserved in a manner appropriate to their significance (NPPF paragraph 189). To that end, and taking into account the tests of soundness set out in paragraph 35 of the NPPF (2021), we find the allocation **unsound**.

#### **Recommend deleting part of 3.5.6.**

We consequently strongly recommend the deletion of the phrase,

*'whilst..., **in the meantime the principle of development coming forward on the Broad Areas is now established** .*

The sentence would then read,

Therefore, ~~**whilst**~~ the locations are broadly identified ~~**at this stage**~~ – and it is intended that the specific site boundaries will be identified through the next Local Plan review, ~~**in the meantime the principle of development coming forward on the Broad Areas is now established**~~.

#### **Recommend preparation of Heritage Impact Assessments.**

If the Council is minded to continue with these broad locations, then we continue to suggest the completion of a brief, proportionate HIA for both Soham sites now to inform the suitability of the site per se in heritage terms, to consider the likely impact on heritage, any capacity issues and any necessary mitigation and enhancement.

The findings of the HIAs should then be used to inform the revised wording in the SIR Plan.

We would be happy to advise on the scope of the HIAs if that would be helpful.