



Mike Burrell  
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Dear Mr Burrell,

**Re. Greater Norwich Local Plan (GNLP) reg. 18 consultation and Interim Sustainability Appraisal**

Thank you for consulting Historic England on the regulation 18 stage of Greater Norwich Local Plan. As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process. Therefore we welcome the opportunity to comment on the draft documents. We have now had the opportunity to review the documents and can provide the following substantive comments.

Approach to the GNLP:

The current Joint Core Strategy (adopted 2011 amended 2014) contains area wide policies and no detailed development management policies these instead seem to be provided by each separate council via a Development Plan Document (DPD). The GNLP will replace the Joint Core Strategy. Paragraph 1.25 of the draft GNLP states that development management policies will not be amended except in very specific circumstances.

It is unclear what the statutory relationship between these documents will be. If the GNLP contains strategic level policies it is not clear how existing development management policies will be able to deliver these strategic objectives and vision given that the development management policies already exist. This raises fundamental question regarding the ability of the overall plan to provide a sound,





evidence based positive strategy for the conservation and enhancement of the historic environment given that the strategic part of the plan will be retrospectively formulated in isolation of the development management parts of the plan. The approach taken means that there will be a period where the development management policies will not synchronise with the new strategic policies. There is concern that this fundamentally undermines a truly integrated plan-led approach to long term development.

We are concerned that the approach taken will result in any plan being unsound as it will in effect be incomplete and the component parts will not reflect each other. It is for these reasons that even in the event the GNLP is sound itself; it is very unlikely that we will be able to confirm that the entire plan is sound. At this stage we must advise that the development management policies are reviewed to ensure that they align and can deliver the strategic policies of the GNLP. I would be grateful to get more clarification from you with regards to this approach. I am happy to follow up with a meeting or phone call before the next stage in the plan process in order to discuss this more.

#### **Q1. Do you agree with the draft Vision and Objectives for the plan below?**

##### Vision:

The Plan's strategic policies will derive from the Vision and so there needs to be sufficient aspirations in the Vision for the maintenance and enhancement of the historic environment as a strand in the pursuit of sustainable development as defined by paragraph 14 of the NPPF. This will help ensure that the associated strategic policies incorporate a positive and clear strategy to deliver the conservation and enjoyment of the historic environment (as linked to paragraphs 126 and 157 of the NPPF).

The Vision at present consists of only a diagram, which whilst useful lacks sufficient detail to contextualise the aspirations of the plan. The Vision should be locally specific to the plan area of Greater Norwich. It should reference the types of heritage assets which make up the stock of designated and non-designated assets within the Greater Norwich area. It would be helpful to describe the types and nature of settlements which characterise the area. The Vision should recognise the irreplaceable nature of the historic environment and heritage assets. It should also convey the importance of the historic environment and how it helps create a sense of local distinctiveness and contributes towards the creation of high quality places that people want to live and work in. The need to conserve or enhance the historic environment should be referred to explicitly.





We request that the Vision shown in Fig 1 on page 17 of the consultation document is amended to replace *enhanced environments* with *enhanced built, natural and historic environments*.

### Objectives:

The objectives shown in Fig 1 on page 17 of the consultation document are split into six categories; Communities, Homes, Infrastructure, Delivery, Environment, and Economy. None of these categories refer to the historic environment. The emerging Plan should account for the historic environment and the need to pursue its conservation and enhancement as an objective as not doing so risks the Plan being unsound.

It is noted that the Environment category contains an objective to protect and enhance the *built and natural environment*. We request that this is expanded to refer to the *built, natural and historic environment*.

### Heritage at Risk (HAR)

There are number of entries on the National 2017 Heritage at Risk register across all three local authority areas, these are:

**Broadland:** Grade II\* listed Burgh Mill; Grade II\* listed and Scheduled Monument of Drayton Lodge; Grade II\* listed Stockhouse at Manor Farm, Freethorpe; Grade I listed Church of All Saints, Beighton; Grade I listed Parish Church of St Agnes, Cawston; Grade I listed Church of All Saints, Marsham; Grade II\* listed Church of St Peter and St Paul, Oulton; Grade I listed Church of St Margaret, Swannington; Scheduled Roman settlement at Brampton/Buxton with Lammas; and the Scheduled Roman camp and settlement site west of Horstead.

**Norwich:** Grade II\* listed 6, 9, 10 Ninham's Court; Grade II\* listed and Scheduled Bishop Salmon's Porch; Grade II\* listed Bethel Hospital; Grade II\* listed Howard's House, 97 King Street; Grade I listed St Mary the Less, Queen Street; Grade II listed Church of St Mark, City Road; Grade II\* listed Octagon Chapel, Colegate; Grade I listed Church of St George, Tombland; and Mile Cross a conservation area and Grade II listed Registered Park and Garden.

**South Norfolk:** Grade II\* listed Church of St Wandregelius, Bixley; Grade II\* listed Billingford Windmill, Scole; Grade I listed Church of St Nicholas, Bracon Ash; Grade I listed Church of St Mary, Denton; Grade I listed Church of St Mary, Forncett; Grade I listed Church of St Mary, Gissing; Grade II\* listed Church of All Saints, Great Melton; Grade I listed Church of St Mary, Haddiscoe; Grade II\* listed Church of St Botolph,





Morley; Grade II\* listed Church of All Saints, Runhall; Grade I listed Church of All Saints, Shelfanger; Grade I listed Church of St Margaret, Starston; Grade I listed Church of St Mary, Yelverton; Scheduled Arminghall sites, Bixley/Trowse with Newton; Scheduled sites at Markshall, Caistor St Edmund; Scheduled Long Barrow and round barrows on Broome Heath, Ditchingham/Broome; the Scheduled Romano-Celtic temple 590m south east of St James's Church, Wicklewood; and Scheduled Moot Hill, Wymondham.

Given the number of HAR entries across the Plan area we would expect to see some reference to the need to tackle HAR at a strategic level. The presence of these heritage assets and their at risk status should also be considered as part of any site allocation process in order to demonstrate that opportunities that may secure the enhancement of these heritage assets at risk have been identified or to determine areas unsuitable for development due to the potential harm and worsening of conditions that development may cause. The number of entries on the HAR register could also be a useful monitoring indicator.

Support for these buildings/historic assets, or any others that are identified to go on the register during the plan period, may be achieved by creating a policy basis for CIL or other contributions levied at development within proximity to any designated asset on the register and/or grant contributions to development that proposes enhancements to identified heritage assets at risk.

The National Heritage at Risk register only covers Grade I and II\* listed buildings, scheduled monuments and conservation areas. We recommend that the emerging plan includes a policy provision for the creation and management of local Heritage at Risk Register which will cover Grade II listed buildings.

## **Q9. Housing - Which alternative or alternatives do you favour?**

Historic England does not advocate a specific housing growth option, in every option however the impact upon the historic environment will be important. The capacity for the area to accommodate new housing development whilst maintaining its historic environment should be a key consideration, so that the quality and character of neighbourhoods, towns and villages is conserved. Integrating consideration of the historic environment into plan making alongside other considerations is a key principle of sustainable development. Where less successful neighbourhoods are proposed for redevelopment opportunities for enhancement should be a priority.

Allocation of new housing sites should be considered in the most sustainable locations and should get the right densities and character appropriate to the area. This approach will require a careful and detailed analysis of locations to ensure that





distribution of housing is appropriate. The historic environment is a critical factor in this analysis in terms of considering the ability of sites and locations to accommodate new housing without undue harm to heritage assets and their settings.

## **Q12. Do you support the long term development of a new settlement or settlements?**

In principle the idea of a new settlement could be an effective way of delivering the required growth across the plan area in a sustainable way, but this is dependent on the soundness of any future site allocations for a new settlement. Landscape and heritages assets should be considered from the outset when determining the location of a new settlement in order to ensure that development can be delivered whilst having regard to the these assets. It is expected that strategic new settlement policies makes reference to the historic environment and the need for its conservation or enhancement. Without this being demonstrated in the identification and justification of sites, and in the wording of the policies the Plan will be unsound.

It is noted that the consultation document outlines that any new settlement would considered in line with the Town and Country Planning Association's (TCPA) Garden City Principles. It is important at this stage to highlight that whilst these principles are useful and do embody a number of modern town planning concepts, they do not address the historic environment. It is therefore unclear how the TCPA principles can be reconciled with the NPPF's definition of sustainable development in terms of its environmental strand which requires the conservation and enhancement of the historic environment.

Whilst the TCPA Garden Cities Principles are silent on the historic environment, their 2017 publication "*The Art of Building a Garden City*" does provide a further level of detail, particularly with regards to the siting of new settlements. This publication states that,

*"locations for new garden cities should not only **avoid** damaging areas that are protected for their ecological ,landscape, **historic** or climate-resilience value but should actively be located in areas where there can be a positive impact on these assets. Underpinning the consideration of sites for new garden cities or towns should be the extent to which each one ... will allow for **positive impacts** on assets of historic value".*

*(Emphasis added, pg 100)*

The process of identifying the location of a new settlement or even whether this is the right approach for a local authority to take should be underpinned by a strong evidence base from an early stage. A key aspect of this will be the consideration of





regional and sub-regional studies in order to inform the best location for a new settlement to satisfy need, these studies are crucial in terms of understanding connectivity and place before designation. If the option for a new settlement is to be taken forward we encourage the Council to follow this evidence based approach. It is also important to ensure that the decision regarding the need and location of a new settlement is locally-led.

We are very reassured to see that the Greater Norwich New Settlement Topic Paper expands upon the TCPA principles and that point r) of the broad criteria for locating new settlements does consider the impact upon heritage assets.

I have provided specific comments on the two proposed locations for a new settlement in the site allocations section of this letter.

## **Q20. How can the Plan best support cultural, visitor and educational uses in the city centre?**

The conservation and enhancement of the historic environment can bring a range of multi-faceted benefits which can help achieve spatial planning goals, particularly those related to culture, tourism and education. Recognising the role the historic environment has to play in creating locally distinct places can help improve economic prospects for places within the Plan area, can help improve well-being for local residents, and promotes an understanding of local history, culture and identity as well helping to establish a high quality environment that people want to visit. It is important to recognise the opportunities that some developments may have in enhancing the historic environment through public realm improvement, allowing public access to heritage assets or better revealing their significance. A coordinated appreciation of the historic environment which addresses both the heritage assets themselves and their setting will reinforce their integrity and therefore will help ensure that historic places and spaces continue to provide long term public benefits. An integrated approach to policy preparation which recognises the social, economic and environmental dimensions of the historic environment and which seek to conserve this irreplaceable resource maximise the positive contribution the historic environment can make.

The plan area's city and town centres incorporate a rich and varied historic environment with many designated and non-designated heritage assets. Efforts to retain and enhance the vitality and viability of the town centres should therefore be linked to the conservation and enhancement of its historic environment. Policies should encourage the enhancement of local character and the public realm.





**Q27. Employment – Which option or options do you support?**

We do not have a preference and do not advocate a specific employment growth option but we require that all options consider the need to conserve and enhance the historic environment. The presence of heritage assets and their settings should be considered from the outset.

**Q35. Are there other measures that the GNLP can promote to support improved sustainable transport and broadband and mobile networks across the plan area?**

Historic England supports the provision of sustainable transport and telecommunications networks.

Transport

There are a number of major transport infrastructure projects and options discussed within the consultation document. These are large projects, the details of which cannot be adequately considered here. We support a cross boundary strategic level consideration of transport infrastructure and look forward to being involved in specific proposals as they progress.

We do not have a preference for any transport growth option at present until further information and analysis has been carried out with regards to potential heritage impacts. We are keen to ensure that growth and development conserves and enhances the significance of Greater Norwich's heritage assets. All proposed infrastructure schemes and route options should take into consideration their impacts on heritage assets and their setting alongside archaeological potential.

New roads, cycle paths and associated infrastructure, including signage and hard standings for example, will result in impacts on landscape and townscape as such Historic England would want to be reassured that matters of siting, location and design will conserve the historic environment of the area. Therefore, it is important to ensure that transport appraisals properly assess all potential impacts on the historic environment to an appropriate level of detail. We have not considered archaeological issues in this response but would refer you to the HER held by the County Council who should be able to advise in this regard. Consideration should be given to the impact of the proposals upon the setting of both the designated and non-designated assets together with the potential for unknown archaeology.





We would recommend that an assessment of impacts upon townscape, historic landscape and historic assets is included in any future assessment of route and infrastructure options.

We would refer you to our website and pages concerning Transport and the Historic Environment <https://historicengland.org.uk/advice/planning/infrastructure/planning-and-transport/>. These pages set out the principles that Historic England will follow when discussing national transport policy and major transport development.

We would also draw your attention to Streets for All – East of England <https://historicengland.org.uk/images-books/publications/streets-for-all-east-of-england/>. The manual offers guidance on the way our streets are managed. Specifically of includes advice on traffic management, signage, lighting, ground surfaces and verges etc. This document is in the process of being updated but the concepts are still relevant.

## Telecommunications

Advanced, high quality communications infrastructure is essential for sustainable growth. The development of high speed broadband technology and other communications networks also play a vital role in enhancing provision of local community facilities and services. However, the siting and location of telecommunications equipment can affect the appearance of the public realm, streetscene, the historic environment and wider landscapes. The consideration of their positioning is therefore important, particularly in conservation areas. Paragraph 43 of the National Planning Policy Framework (NPPF) states that local planning authorities, in preparing local plans, should support the expansion of electronic communications networks, including telecommunications and high speed broadband but that they should aim to keep the numbers masts and sites to a minimum consistent with the efficient operation of the network.

The NPPF goes on to state that where new sites are required, equipment should be sympathetically designed and camouflaged where appropriate. Crucially, the NPPF identifies the protection and enhancement of the historic environment as being a key strand in what it defines sustainable development (paragraph 7). We would therefore urge the emerging Local Plan, to ensure that any telecommunications policies include a provision for the protection of the historic environment and a requirement for applicants to consider the siting, design and positioning of equipment in this context. Telecommunications policies should have regard to the wider townscape and historic environment.







**Q.36: Which approach do you support for promoting good design of new development?**

A high quality design approach which responds to local distinctiveness and seeks to reinforce local character is encouraged; this should benefit the historic environment. The mass, scale, siting, position and detailed design of development should be appropriate for its location. Development should preserve the character and seek to enhance the setting of conservations areas.

**Q50. Do you support the favoured option for climate change policy?**

As mentioned earlier within this we letter have fundamental concerns regarding the absence of any consideration of the historic environment in the plan's strategic environment objective. We request that any climate changes policies within the plan address the inclusion of renewable technologies within conservation areas and to historic buildings and the wider historic landscape. A sustainable approach should secure a balance between the benefits that such development delivers and the environmental costs it incurs. The policy should seek to limit and mitigate any such cost to the historic environment.

Listed buildings, buildings in conservation areas and scheduled monuments are exempted from the need to comply with energy efficiency requirements of the Building Regulations where compliance would unacceptably alter their character and appearance. Special considerations under Part L are also given to locally listed buildings, buildings of architectural and historic interest within registered parks and gardens and the curtilages of scheduled monuments, and buildings of traditional construction with permeable fabric that both absorbs and readily allows the evaporation of moisture.

In developing policy covering this area you may find the Historic England guidance *Energy Efficiency and Historic Buildings – Application of Part L of the Building Regulations to historically and traditionally constructed buildings* <https://historicengland.org.uk/images-books/publications/energy-efficiency-historic-buildings-ptl/> to be helpful in understanding these special considerations.

It would be helpful for any climate change policy to refer back to the NPPF and what it takes to mean by sustainable development and its multifaceted strands. The conservation and enhancement of the historic environment is a key part of the what sustainable development is taken to mean within the NPPF. It is not therefore especially helpful to separate out sustainable development issues such as climate change and the historic environment. An integrated approach is required in order to achieve sustainable development. Some types of energy efficiency methods and





renewable energy equipment will unquestionably have a detrimental impact upon the historic environment and as such a flexible approach will be required in order to reconcile climate change measures with the conservation of the historic environment in the pursuit of sustainable development. Historic England would advocate against the formation of a climate change policy which does not consider the consequences upon the historic environment and such an approach would be result in the Plan being found unsound.

**Q54. Do you think any changes should be made to the Green Infrastructure network?**

Landscape, parks and open space often have heritage interest, and it would be helpful to highlight this. It is important not to consider 'multi-functional' spaces only in terms of the natural environment, health and recreation but to also recognise their heritage value. It may be helpful to make reference in the text to the role GI can have to play in enhancing and conserving the historic environment. It can be used to improve the setting of heritage assets and to improve access to it, likewise heritage assets can help contribute to the quality of green spaces by helping to create a sense of place and a tangible link with local history. Opportunities can be taken to link GI networks into already existing green spaces in town or existing historic spaces such as church yards, or even road verges, tow paths etc. to improve the setting of historic buildings or historic townscape. Registered Parks and Gardens and other historic green spaces make a substantial contribution to the county's existing green infrastructure network. Maintenance of GI networks and spaces should also be considered so that they continue to serve as high quality places which remain beneficial in the long term.

**Q55. Landscape – Which of these options do you favour?**

The GNLP should recognise that landscape itself constitutes part of the historic environment and is not a separate entity to it. The position of hedge rows and fields markings for example shows how the land was used in the past, and the position and siting of access points, tracks and foot paths often indicate the historical way people would access and travel through the landscape. These features can be a powerful visual remnant of more rural heritage and traditions. The lay out of the landscape, its undulations and wider views can have historic significance as well as landscape significance so it is important to acknowledge this in the Plan. Landscape is also an important aspect of setting, from farm buildings, designed landscape, isolated buildings, villages and townscapes.





The plan pays little attention to designed landscapes and their settings such as registered parks and gardens (RPAG), which are nationally designated heritage assets. The text in paragraph 6.164 which states that there are no nationally designated landscape areas in Greater Norwich, is of concern. There are number of registered parks and gardens throughout the GNLP area, these are:

**Broadland:** Grade II\* RPAG Blickling Hall; Grade II\* RPAG Heydon Hall; Grade II\* RPAG Catton Hall; and Grade II RPAG Salle Park.

**South Norfolk:** Grade II RPAG Ditchingham Hall; Grade II RPAG Rainthorpe Hall; Grade II\* RPAG Intwood Hall; Grade II\* RPAG Kimberley Hall; Grade II RPAG Langley Park; Grade II\* RPAG Raveningham Hall; and Grade II RPAG Crown Point.

**Norwich:** Grade II RPAG The Plantation Garden; Grade II\* RPAG Eaton Park; Grade II RPAG Mile Cross Gardens; Grade II RPAG Wensum Park; Grade II RPAG Heigham Park; Grade II\* RPAG Waterloo Park; Grade II RPAG Norwich City Cemetery; Grade II\* RPAG The Rosary Cemetery; and Grade II RPAG Chapelfield Gardens.

Linking up these RPAGs into Green Infrastructure networks both rurally and in urban centres can help secure access to and knowledge of these heritage assets which will help contribute towards a sound positive strategy for the historic environment as required by the NPPF. This section of the Plan would be strengthened by articulating the link between landscape and green infrastructure with the conservation and enhancement of the historic environment.

Neither of the options proposed contain an integrated approach which positively identifies the relationship between landscape and the conservation of the historic environment. We note that paragraph 6.162 identifies the need to respect character and enhance landscape settings, and whilst this is welcomed it should be expanded upon to recognize the heritage dimension of landscape. A consistent approach across all three local authority areas is preferred.

We are pleased to see that this section of the consultation documents makes reference to landscape character assessments and historic landscape character assessments; we recommend that these sorts of tools are used to support the site identification and allocation process.





**Q56. Should the GNLP protect additional Strategic Gaps and if so where should these be?**

We are pleased to see that the Strategic Gaps are used in order to maintain a distance of separation between settlements in order to retain the identity of settlements and the landscape character of the area. We support this approach and it will be helpful in avoiding the coalescence of settlements. We do not advocate any specific locations for the Strategic Gaps as where they go will depend on where they will be necessary based on growth options and development pressures. We do suggest that Strategic Gaps should be large enough to perform a useful rural space in order to ensure the quality of the land is maintained and they do not become derelict spaces whose sole function is to separate development.

**Q61. Neighborhood Planning – Do you support option NP1? If so which GNLP policies should be “strategic”?**

Yes, we agree that the strategic policies within the GNLP should be identified as such for the purposes of neighborhood planning. It is imperative that a strategic policy exists for the conservation and enhancement of the historic environment, without this the plan will be unsound. The consultation document does not appear to include an option to include a strategic policy on this; we request that one is added.

**Q63. The Broads – Do you support option BR1?**

Yes, we agree that a policy to protect the setting of the Broads is necessary and demonstrates a cross-border approach to planning in the area. We are pleased to see that the policy improvements include greater reference to the special character of the Broads.

**Q64. Are there any current indicators that should be excluded or included in the GNLP monitoring framework?**

We recommend indicators to measure how successful policies relating to the historic environment are. These can include preparation of a local list, completion of conservation area action plans and management plans, reduction in the number of assets that are classified as heritage at risk.





**Q66. Are there any other issues relating to the GNLP you would like to raise?**

Whilst the Site Proposals document does consider the historic environment, the strategic policies and strategic direction outlined within the Growth Options document consistently under-represents the historic environment. Sections of the Growth Options document on culture and landscape touch on history, architecture and historic buildings of Greater Norwich but currently no policy options are being considered which explicitly refer to the wider historic environment or its conservation and enhancement. There is nothing to demonstrate that consideration extends beyond just consideration of historic buildings. The plan should recognize that designated heritage assets include conservation areas, scheduled monuments, registered parks and gardens as well as listed buildings. We expect to see appropriate reference to non-designated heritage assets as well such as locally listed buildings, areas of archaeological importance, other designed or historic landscapes, as well as undiscovered or unknown heritage assets which may well be of national importance.

The GNLP consultation documents and Interim Sustainability Appraisal exhibit an overreliance on national policy and legislation to secure the conservation and enhancement of the historic environment. Whilst listed building consent applications, for example, do not have to be determined in accordance with the development plan rather they should be determined in accordance with the law and the relevant policies of the NPF, the objectives of the local plan and the policies it contains may be a material consideration in those decisions. This approach would result in the near total absence of any policy protection for non-designated heritage assets.

Local development plans must be prepared with the objective of contributing to sustainable development. They should therefore be consistent with the principles and policies set out in the NPPF which defines sustainable development. The conservation and enhancement of the historic environment is a key strand of the environment aspect of this NPPF definition. The NPPF contains objectives for planning (including the objective of protecting and enhancing the historic environment) paragraph 152 states that local authorities should seek opportunities to achieve each of the social, economic, and environmental dimensions of sustainable development and net gains across all three; specific policies about certain topics (including conservation of the historic environment); and specific policies on what the local plan should contain. Local plans must align with those objectives and adhere to specific policies in order to be adopted.

There is considerable concern that current direction of the GNLP consultation documents will not be conducive to developing a sound plan. The GNLP does not appear to comply with paragraph 156 of the NPPF which requires strategic policies to cover the conservation and enhancement of the historic environment. It also does not





align with paragraph 157 which requires the plan to contain a clear strategy for enhancing the historic environment. To rely on national policy for heritage matters prevents the GNLP from having a locally specific policy approach and questions whether the Local Plan meets the NPPF's positive strategy approach advocated in Paragraph 126. Relying on national mechanisms to do this and having no strategy means the plan will be **unsound**.

We recommend that the plan includes additional coverage for the historic environment.

### **Site Allocations**

A Site Proposals Document which covers sites and development boundaries has been provided and this forms part of the Regulation 18 consultation. It accompanies the main consultation Growth Options document, which covers the strategic plan approach.

Paragraph 1.2 of the Site Proposals Document confirms that no decision has been made about which sites will be brought forward into the emerging plan and that the sites which are discussed are done so in order to give an early indication of their possible suitability. Paragraph 1.5 also confirms that consultees can still put forward sites for consideration. It is understood that at this stage it is unlikely that a list of sites to be brought forward into the plan will have been refined, but given our limited capacity it is not practicable or possible for us to comment on each site outlined in the Site Proposals Document. This does not mean that we support the potential allocations or agree with any assessment of suitability. Instead we will offer comments on the methodology used and on the areas identified for the potential new settlement. We will also offer general advice on the site selection process.

#### **Site Proposals document Methodology:**

We are pleased to see that paragraph 2.4 of the Sites Proposals document confirms that the views of local Conservation services and Norfolk County Council's Historic Environment Service have taken into account in the HELAA assessment. We request that the involvement of these key services is continued throughout the plan process. The HELAA appears to have been used as supporting evidence for the Site Proposals document which builds off the initial HELAA data.

The site selection summaries in the Sites Proposals Document are concise whilst being comprehensive. The summaries contain appropriate reference to important issues such as townscape, landscape, character and form, and visual impact throughout. We are very pleased to see that heritage assets such as conservation areas, listed buildings and scheduled monuments have been identified within the





summaries. The site summaries exhibit an understanding of the concept of setting which is referred to throughout; this is extremely welcome as it is a key aspect of a heritage asset's significance. Where negative impacts upon the historic environment as a result of development of a potential allocation have been anticipated the site summaries express this, the site summaries also identify areas where further work will be required in order to further investigate the constraints and opportunities of sites.

The site selection methodology used in the Site Proposals document is appropriate and provides a sound basis for the next stage of the site selection process.

### Mapping

The use of interactive electronic maps at this stage is reasonable given the number of sites, however we recommend that once a short list of sites has been compiled that inset maps are provided in the plan document itself alongside any site specific policy. This will aid initial understanding of the site and will improve the clarity of the plan, specifically in relation to site boundaries. When undertaking this representation we encountered issues accessing some of the maps and the hyperlinks to maps within the Site Proposals document did not work although we were able to access the maps through other parts of the website. As a statutory consultee and key duty to cooperate body, if we cannot distinguish site boundaries we will simply be unable to provide advice on the potential impacts upon the historic environment as we will be unable to determine what heritage assets may be affected and to what extent.

### **Honingham Thorpe (site GNLP 0415 A to G)**

This site is located to the immediate south of the A47 between the small settlements of Honingham and Easton.

There do not appear to be any known designated heritage assets within the site directly but given the scale of the map it is hard distinguish precise boundaries. There are however a number of designated heritage assets near the site which will need to be taken into account as part of the allocation process. These include the Grade I listed Church of St Peter and the Grade II\* listed Church of St Andrew. Given the high grading of these two designated heritage assets Historic England will be a statutory consultee in any prospective planning application affecting the setting of the churches. There are also seven Grade II listed buildings surrounding the site. These include Church Farm House, the Barn at Church Farmhouse, Malthouse, The Old Hall, the Barn at The Old Hall, The Old Horse and Groom and Greenacres Farm House.





The site allocation is largely undeveloped open land, there are also two records indicating the presence of ring ditches within the site area. As the area has not been developed before, therefore the relative lack of recorded evidence should not be interpreted to mean that the site has no heritage interest rather than no one has had to undertake any investigation of the site. Therefore it will be important to consider the possibility that the site may contain undiscovered archaeology and to ensure that the impacts on potential archaeological remains within the site are considered.

Consideration may also need to be given to other local designated and undesignated heritage assets, but the local and county conservation/historic environment services will be best placed to provide advice on this.

The Site Proposals document makes no reference to the presence of designated heritage assets. We are however pleased to see that the Site Proposals document recognises the need for a very significant amount of further work to be carried out in order to investigate the opportunities and constraints of the site. We agree with this assumption and request that extra work involves the production of a Heritage Impact Assessment (HIA) and an exploration of potentially undesignated or undiscovered heritage in the form of archaeology. The HIA should consider landscape implications, the setting of heritage assets and how they relate to their surroundings. These findings should inform the site allocation process.

### **West of Hethel, Stanfield Hall Estate (site GNLP 1055)**

The site contains the Grade II\* listed Stanfield Hall and the associated Grade II listed bridge across the moat east of Stanfield Hall. It is not exactly clear from the maps but it appears that the Grade II listed Limetree Farmhouse also all within the site boundary. There are a number of other Grade II listed buildings around the north and western boundaries of the site which could also be affected; these are generally farm buildings, cottages, a schoolhouse and Browick Hall. The rural setting and relationship of the properties to the surrounding land will therefore be important aspects of these buildings' significance.

The site also contains a number of historic features which have not been designated but maybe of local importance. A large expanse of land to the east of Stanfield Hall and between St Thomas' Lane to the north and Wymondham Road to the south is a former World War Two military airfield, Hethel Airfield. The airfield was used by the United States Army Air Force as a heavy bomber base. In 1964 part of the site was taken over as test track and factory for Lotus Cars. Also running through the site to the south of Hall Farm is the route of the 1881 Wymondham and Forncett Branch Railway – the track was lifted in 1952.







Given the high grading of Stanfield Hall, Historic England will need to be a statutory consultee as part of any prospective applications for planning permission. Stanfield Hall itself dates from 1792, the moat with its Grade II listed bridge is thought to be an 18<sup>th</sup> century ornamental landscape feature. The abridged version of Norfolk County Council's Historic Environment Record (HER) indicates that Stanfield Hall has medieval origins with the current structure being built upon the site of an earlier manor.

A great deal of the historic significance of Stanfield Hall is connected with the two principle phases of building in 1792 and the early years of the 19<sup>th</sup> century that resulted in major early gothic interiors and the house's exterior elevation and landscaping. The latter includes mature planting and incorporates a gate lodge on the main road. The principle windows of the Hall command views to the south, it is unclear if the site was actively managed as part of the Hall's designed setting it does lie within principle views. The allocation site constitutes the wider setting of the building and makes a particular contribution to its historic significance. The development of this site will result in harm to the significance of the building's wider setting and this should be taken into account when considering the allocation of this site. The site allocation entirely surrounds Stanfield Hall and this is of concern.

The Site Proposals document makes no reference to the presence of designated heritage assets. We are however pleased to see that the Site Proposals document recognises the need for a very significant amount of further work to be carried out in order to investigate the opportunities and constraints of the site. We agree with this assumption and request that extra work involves the production of a Heritage Impact Assessment (HIA) and an exploration of potentially undesignated or undiscovered heritage in the form of archaeology related to the medieval origins Stanfield Hall as well as more recent archaeological finds associated with the railway and airfield. The HIA should consider landscape implications, the setting of Stanfield Hall and how it relates to its surroundings. These findings should inform the site allocation process.

### General comments on the site allocation process:

Historic England advocates a wide definition of the historic environment which includes not only those areas and buildings with statutory designated protection but also those which are locally valued and important, as well as the landscape and townscape components of the historic environment. The importance and extent of below ground archaeology is often unknown, although information in the Historic Environment Record (HER) will indicate areas of known interest, or high potential where further assessment is required before decisions or allocations are made. Conservation and archaeology staff within the relevant councils should be consulted





on matters relating to archaeology, landscape/townscape and the historic environment generally.

We often find that while some of the sites in the Plan identify heritage assets as potential constraints, this is not always consistently done for all sites and all heritage assets. There also can be limited information in documents on how sites might be developed, making it difficult for Historic England, and others, to assess their full impact. We are keen that allocated sites include development criteria to guide future proposals, including references to the historic environment where needed (this follows the national Planning Practice Guidance). There is a danger to both heritage assets and potential developers of allocating sites without such criteria and establishing the principle of development without guidance on the issues that need to be addressed at the planning application stage. The significance of heritage assets, and the potential impact of allocations on that significance, will need to be understood and justified.

It should be noted that there are areas of archaeological interest beyond scheduled monuments and historic landscape issues beyond registered historic parks & gardens. Wider archaeological and landscape/townscape impacts are important considerations and need to be factored into site assessment. The possible cumulative impact of a number of site allocations in one location could also cause considerable harm to the historic landscape/townscape.

All sites should be scoped for archaeological potential before taking them forward to the next stage, as there is a high likelihood of archaeological sites not on the HER. Archaeological assessment and evaluation should be in line with the NPPF and best practice guidance so that impacts can be assessed at the earliest opportunity.

Our Advice Note 3 on the historic environment and site allocations may be of use, it is available here: <https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>

### Assessing sites:

Our advice note 3 on site allocations in local plans sets out a suggested approach to assessing sites and their impact on heritage assets. It advocates a number of steps, including understanding what contribution a site, in its current form, makes to the significance of the heritage asset/s, and identifying what impact the allocation might have on significance. This could be applied to the assessment and selecting of sites within a plan.

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
- 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.

If a site is allocated, we would expect to see reference in the policy and supporting text to the need to conserve and seek opportunities to enhance the on-site or nearby heritage assets and their setting, the need for high quality design and any other factors relevant to the historic environment and the site in question.

### Setting

We expect to see appropriate references to setting in policies. As with assessing the impact of site allocations on setting, with a site specific allocation, it is important to understand the significance of any heritage asset/s, and their setting/s, that would be affected by the site allocation in order for the policy to reflect these considerations. This involves more than identifying known heritage assets within a given distance, but rather a more holistic process which seeks to understand their significance and value. Whilst a useful starting point, a focus on distance or visibility alone as a gauge is not appropriate. Site allocations which include a heritage asset (for example a site within a Conservation Area) may offer opportunities for enhancement and tackling heritage at risk, while conversely, an allocation at a considerable distance away from a heritage asset may cause harm to its significance, reducing the suitability of the site allocation in sustainable development terms. We would expect to see this reflected in the policy wording and supporting text.

### **Glossary**

We note that the glossary provides a definition for conservation areas but it does not cover any other heritage assets. Glossaries should include consistent definitions for all heritage assets mentioned in the local plan. These would typically include:





Listed Buildings  
Scheduled Monuments  
Conservation Areas  
Registered Parks and Gardens  
Registered Battlefields  
Protected Wrecks  
Non-designated heritage assets / Local Heritage Assets / Locally Listed Heritage Assets / Locally Listed Buildings

### **Comments on Interim Sustainability Appraisal**

The historic environment should be considered as part of the sustainability appraisal process. We recommend that these comments should be read alongside our Advice Note 8, available here: <https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/>

### **Key Sustainability Issues**

We would suggest that the starting point for considering Key Sustainability Issues for the Historic Environment should include:

- Conserving and enhancing designated and non-designated heritage assets and the contribution made by their settings
- Heritage assets at risk from neglect, decay, or development pressures;
- Areas where there is likely to be further significant loss or erosion of landscape/seascape/townscape character or quality, or where development has had or is likely to have significant impact (direct and or indirect) upon the historic environment and/or people's enjoyment of it
- Traffic congestion, air quality, noise pollution and other problems affecting the historic environment

We would expect to see consideration of opportunities. It is considered that the historic environment can make a significant contribution to the success of development and there may be opportunities for the enhancement of the historic environment which comes from sustainable development proposals. It is considered that the Sustainability Appraisal should highlight these opportunities. Examples of the sorts of opportunities that can be used can be found in our guidance notes in the links above.





We request that the sustainability issues table at the start of section 3 is amended to replace the term *built heritage* with the *historic environment*. The issues set out in this table are appropriate and we are pleased to see reference to the effects of more intangible elements such as pollution, traffic, etc. on the historic environment. We recommend however that heritage at risk is also listed as an issue here.

As outlined earlier in this letter we do not agree with the GNLP objectives which are replicated in section 4 of the Interim SA as they do not contain any reference to the need for the conservation and enhancement of the historic environment as required by the NPPF. Given that these objectives have been used to evaluate the SA objectives we necessarily have fundamental concerns with the SA findings which consider the objective to have a generally positive impact.

We are however pleased to see the inclusion of SA Objective SA13, this objective is appropriate and has been used to assess the potential effects of policies within the GNLP. SA13 makes appropriate reference to setting and the wider historic environment.

We note that a number of the policies would result in significant negative impacts upon the SA13 baseline. We therefore expect to see the inclusion of criterion which address the negative effects of the options to be taken forward.

### Method for Generation of Alternatives

The historic environment should be a factor when considering a method for the generation of alternative proposals. The impact of proposals on the significance of heritage assets should be taken into consideration at an early stage. In terms of sites, this should be based on more than just measuring the proximity of a potential allocation to heritage assets. Impacts on significance are not just based on distance or visual impacts, and assessment requires a careful judgment based on site visits and the available evidence base.

### Conclusion

In preparation of the forthcoming Local Plan we encourage you to draw on the knowledge of local conservation officers, the county archaeologist and local heritage groups.

Please note that absence of a comment on an allocation or document in this letter does not mean that Historic England is content that the allocation or document forms





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part of a positive strategy for the conservation and enjoyment of the historic environment or is devoid of historic environment issues. Where there are various options proposed for a settlement, identification of heritage issues for a particular allocation does not automatically correspond to the support for inclusion of the alternative sites, given we have not been able to assess all of the sites.

Finally, we should like to stress that this opinion 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 where we consider that these would have an adverse effect upon the historic environment.

Sincerely

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