



Direct Dial:

Our Ref: PL00022531

Mike Burrell  
Greater Norwich Planning Policy Team Manager  
[gnlp@norfolk.gov.uk](mailto:gnlp@norfolk.gov.uk)

16 March 2020

Dear Mr Burrell

### **Greater Norwich Local Plan Draft Strategy- Regulation 18. March 2020**

Thank you for consulting Historic England on the Greater Norwich Local Plan Regulation 18 Draft including The Strategy and The Sites. As a statutory consultee, our role is to ensure that the conservation of the historic environment is fully integrated into planning policy and that any policy documents make provision for a positive strategy for the conservation and enjoyment of the historic environment.

Our comments below should be read with reference to our previous comments dated 1.2.17, 15.3.18, 4.12.18 and 26.4.19. Please also see our detailed comments in the attached tables, Appendix A in relation to The Strategy and Appendix B regarding The Sites.

### **SUMMARY**

The Greater Norwich Local Plan covers the Strategy and Site Allocations. While commenting on the plan as a whole, Historic England is particularly concerned, in current circumstances, for its implications for Norwich itself. Norwich is one of England's great historic cities, and its architectural and historic character, and the sense of place associated with that, make a profound and wholly beneficial contribution to the city's well-being.

While Norwich City Council has worked very successfully to conserve that character - often in partnership with Historic England - we have become increasingly concerned over recent years by a number of developments which have been harmful, permitted despite the very good plan currently in place, for example Anglia Square.

In this context we have looked at the draft Local Plan with particular interest. Unfortunately we consider that when taken together these documents would not



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provide a sound planning framework for Norwich, and would not protect the city's character, whether understood in terms of the character and appearance of the Norwich City Centre Conservation Area or of the significance of the city's numerous designated heritage assets.

We remain concerned that the allocations plan provides for the redevelopment of Anglia Square at a scale similar to that which would be entailed by the proposals currently before the Secretary of State. We consider that the present scheme - and any of similar scale - would severely harm the character of the Norwich City Centre Conservation Area and harm in varying degrees the significance of many of the city's historic buildings and monuments, including that of the castle, two cathedrals, City Hall and the churches of St Peter Mancroft and St. Giles - the six major landmarks of the city. We await the Inspectors letter and any future policy will need to be guided by these findings.

This points to the need to explore and understand how development of high density can be accommodated within the city in a manner compatible with the conservation of its character. In pursuit of this we advise that the council's should commission evidence both in respect of density and in respect of the relationship between tall buildings, mass and the character of the city. This would provide a more robust evidence base and shape a justified policy approach to tall buildings.

There is much in the documents with which we wholly concur, of course, and in making these comments we hope to assist the councils in what must be a shared objective - that of promoting sustainable development in which the conservation of the city's historic environment supports the social and economic well-being of the city and eth wider area. Developments such as the Forum, the cathedral refectory and, most recently, Norwich City Council's Goldsmiths Street show how the pursuit of development of good quality is consistent with conservation, and this is something which should inform the entire local plan.

Whilst we consider many aspects of the plan to be sound we have identified issues with some of the policies and site allocations which do compromise the overall soundness of the plan.

Under paragraph 35 of the NPPF some aspects of this Plan are unsound as they have not been positively prepared, are not justified, effective, or consistent with national policy. We have identified below some of the key areas where we find the Plan **unsound** and what measures are needed to make the Plan sound. In summary we highlight the following issues:

#### **a) Development Management Policies**

We continue to have significant concerns that the Development Management Policies for the three local authorities have not been reviewed as part of this



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Local Plan (although we note that there is some mention that they may be prior to EIP) for the reasons set out in Appendix A. We recommend that the Development Management Policies are reviewed and incorporated into the Regulation 19 Plan as a matter of priority.

**b) Historic Environment Policy**

It is our view that there is **insufficient policy detail for the historic environment**. The strategic historic environment policy is currently combined with the natural environment policy (Policy 3). We would expect to see a more detailed policies for the historic environment - presumably in the development management policies section of the Plan. Such policies should cover designated heritage assets, non-designated heritage assets including Local lists, archaeology, a policy to address heritage at risk (including provision for a local heritage at risk list), historic shop fronts, historic landscape character etc. The strategic policy inevitably lacks that level of detail but without seeing the detailed policies it is hard to comment on the soundness of the Plan in the round. This further underlines the need to update the development management policies at the same time so the Plan can be read as a whole. It is difficult to see whether the historic environment will be adequately covered without seeing the updated Development Management Policies.

**c) Key principles for development of City sites**

Whilst we broadly welcome the principle of redevelopment of many brownfield sites, it is clearly important that such development does not cause harm to the historic environment of City. To that end we suggest a number of key principles for development which could be incorporated into policy 7.1, section 5 namely:

- Development should be of a scale and massing in keeping with the surrounding area;
- Development should respect and reinterpret the historic grain, street layouts, burgage plots and morphology of the City;
- Development should avoid breaking the skyline or competing with historic landmark buildings across the City;
- Development should use materials in keeping with the historic fabric of the City.

**d) Strategy for tall(er) buildings in Norwich**

In addition to these key principles, we also consider that it would be helpful to undertake a tall buildings study to provide the evidence base and contribute towards the development of an appropriate tall(er) buildings policy for the Plan. This might also consider the question of massing. We would welcome the opportunity to discuss the development of a policy approach to taller buildings in more detail with you. By developing a strategy for height and mass, this will help to secure sustainable development of high quality that protects and enhances the historic environment, character and significance of the City.

**e) Indicative Site Capacity**

We are concerned that some of the indicative capacities for site allocations may not be realistic. To that end we consider that it would be useful for you to prepare an evidence base document outlining the site capacities and the assumptions that have been made in reaching these figures, particularly for the sites in the City. This will provide a means of demonstrating whether the indicative site capacities are justified, realistic and achievable in terms of their impact upon the historic environment (and other factors). Our concerns are set out in more detail in Appendix A and B.

**f) Impact on historic environment for some site allocations**

We are concerned that there is currently **insufficient evidence in relation to the historic environment in terms of site allocations**. Paragraph 31 and 187 of the NPPF requires a proportionate evidence base for Plans. To that end, we suggest that you review the site assessments to ensure that there is sufficient and robust in its consideration of the historic environment. We suggest that a brief **Heritage Impact Assessment (HIA)** is undertaken for **ALL** sites in the Plan following the 5 step methodology, with more detailed HIA being undertaken for selected sites where the heritage issues are greater. We suggest more detailed HIA for the following sites GNLP0409R, GNLP3053 GNLP3054, GNLP0125, GNLP2143, GNLP379, GNLP0229, GNLP 2019 and GNLP0133B and D. This is not an exhaustive list and it may be that in preparing the brief HIAs you identify other sites which also warrant a fuller assessment. We would remind you that paragraph 32 of the NPPF makes it clear that significant adverse impacts should be avoided wherever possible and alternative options pursued. Only where these impacts are unavoidable should suitable mitigation measures be proposed. Further detail is given in the attached table.

**g) Policy wording for some site allocations**

As currently drafted there is either a **lack of criteria or insufficient detail within the site specific policies for the conservation and enhancement of the historic environment**. The NPPF (para 16d) makes it clear that Plans should contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals. Further advice on the content of policies is given in the PPG at paragraph Paragraph: 027 Reference ID: 61-027-20180913 Revision date: 13 09 2018 that states, 'Where sites are proposed for allocation, sufficient detail should be given to provide clarity to developers, local communities and other interested parties about the nature and scale of development'. The policies should be re-worded to include criteria for the protection and enhancement of the historic environment. This will provide greater protection for the historic environment and ensure clear and robust policies are in place that provide the decision maker and developers with



a clear indication of expectations for the sites. Further details of our suggestions in this regard for each of the sites and a comment on site allocations in general are given in the attached table B.

We have suggested a series of other changes to the Plan. Many of these changes suggested do not go to the heart of the Plan's soundness, but instead are intended to improve upon it. We believe that these comments can be addressed by changes to wording in the plan.

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 we have not had the capacity to review the Sustainability Appraisal in any detail at this stage.

Please note that absence of a comment on a policy, allocation or document in this letter does not mean that Historic England is content that the policy, allocation or document is devoid of historic environment issues. We should like to stress that this response 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 as a result of this plan, where we consider that these would have an adverse effect upon the historic environment.

If you have any questions with regards to the comments made then please do get back to me. We suggest that it would be helpful to discuss the Plan and our comments in more detail with you, perhaps by teleconference. In the meantime we look forward to continuing to work with you and your colleagues.

Yours Sincerely

Debbie Mack  
Historic Environment Planning Adviser, Planning Group  
E-mail: [Debbie.Mack@HistoricEngland.org.uk](mailto:Debbie.Mack@HistoricEngland.org.uk)

