

## Appendix A: Table of Historic England's comments on the Draft Greater Norwich Local Plan

[Historic England's comments on the proposed Allocations are set out in Appendix B]

Page	Section	Support/ Object/ Comment	Comments	Suggested Change
	<b>Section 1</b>			
P6	Section 1 para 2	Support	Welcome the reference to heritage and the historic environment.	
P9	Section 1 para 20	Object	<p>We note that you are not proposing to update the Development Management policies at the present time. This approach is of concern to us. It would be helpful if the Plan could be read as a consistent whole, both for decision makers, developers and the public.</p> <p>Paragraph 20 of the draft GNLP states that development management policies will not be amended except in very specific circumstances.</p> <p>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.</p>	<i>Please update Development Management policies too.</i>

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			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 again advise that the development management policies are reviewed to ensure that they align and can deliver the strategic policies of the GNLP.	
	<b>Section 2</b>			
25	Paras 93-96	Object	We suggest a little more descriptive detail about the heritage in the Local Plan area. What is unique and distinctive about this place? What needs to be protected, conserved and enhanced? What heritage is at risk? What about historic landscape characterisation?	<i>We suggest a little more descriptive detail about the heritage in the Local Plan area. What is unique and distinctive about this place? What needs to be protected, conserved and enhanced? What heritage is at Risk? What about historic landscape characterisation?</i>
25	Para 93	Object	We suggest changing historic assets to heritage assets, in accordance with the terminology used in the NPPF.	<i>Change historic assets to heritage assets,</i>
25	Para 95	Object	We suggest you use the term Registered Parks and Gardens.	<i>Use the term Registered Parks and Gardens</i>
26	Para 96	Object	We suggest you use the term scheduled monuments rather than ancient monuments, in line with the NPPF. Modern convention is to refer to scheduled monuments rather than scheduled ancient monuments, given that a wide range and age of monuments are scheduled.	<i>Use the term scheduled monuments rather than ancient monuments</i>
26	Table 3	Object	As above – use the terms Scheduled Monuments and Registered Parks and Gardens	<i>Use the terms Scheduled Monuments and Registered Parks and Gardens</i>
	<b>Section 3</b>			

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31	110	Object	Change historic assets to historic environment. The historic environment is considered the most appropriate term to use as a topic heading as it encompasses all aspects of heritage, for example the tangible heritage assets and less tangible cultural heritage.	<i>Change historic assets to historic environment.</i>
34	Environment	Object	It would be helpful to separate out the natural and historic environment here?	<i>separate out the natural and historic environment</i>
34	Para 132	Object	We welcome the reference to distinctive local characteristics of our city, towns and villages. However, also need to refer to landscape. Again would be helpful if you can describe in more detail what is unique and special about your area in terms of heritage.	<i>Also refer to distinctive landscapes. Describe in more detail what is unique and special about your area in terms of heritage.</i>
35	Objectives	Object	We broadly welcome the objective for the environment. Again it might be helpful to either separate out into Natural and historic environment or at least change the title to include specific reference to built, historic and natural environment.	<i>Either separate out into Natural and historic environment or at least change the title to include specific reference to built, historic and natural environment.</i>
	<b>Section 5</b>			
56 - 62	Policy 2 Sustainable Communities	Object	There is no mention of the historic environment in this policy on sustainable communities. Paragraph 8 of the NPPF makes it clear that achieving sustainable development means that the planning system has three overarching objectives, the third of which is an environmental objective to contribute to protecting and enhancing our natural built <b>and historic environment</b> . To that end we would expect to see reference to the historic environment in the policy on page 61 and also in the key issues addressed by the policy as set out in Table 2.	<i>Include reference to the historic environment in the policy as required by para 8 of the NPPF.</i>
P64 - 68	Policy 3 Environmental Protection and Enhancement			

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	Para 176	Support	We welcome this paragraph including brief mention of heritage at risk.	
	Para 177-179	Object	We would like to see more here about the distinctive, unique heritage of the area – what makes this special and different from elsewhere? Think about building materials, building styles, local vernacular, settlement form and pattern and so on and try to describe that here. We need to know what we have that we need to protect and enhance.	<i>Add more description about what is distinctive/unique etc. about the historic environment of the area.</i>
	Para 179 and 180	Object	Replace historic assets with heritage assets for the reasons set out above	<i>Replace historic assets with heritage assets</i>
	Para 182	Object	Make the point that harm should be avoided in the first instance. Be careful when talking about weighing against public benefits – there are different tests depending upon the grade of asset and the degree of harm. Suggest making reference here to the NPPF.	<i>State that harm should be avoided in the first instance.</i>  <i>Add the following to the end of the last sentence ...in accordance with the various tests set out in the NPPF.</i>
	Omission – Heritage at Risk	Object	Add a policy and paragraph on heritage at risk. There are a high number of assets on the Heritage at Risk Register in this Local Plan Area. Summarise the type of assets at risk. State what you are planning to do to address this.	<i>Add a policy on Heritage at Risk.</i>
	Omission – Historic Landscape Characterisation	Object	We suggest adding reference (policy and text) to Historic Landscape Characterisation and Landscape Character Assessments. Landscape character assessments, particularly those accommodating major developments, can be deficient in assessing the landscape value relating to scheduled monuments and their settings. The historic environment has an important role to play in understanding the	<i>Add reference (policy and text) to Historic Landscape Characterisation and Landscape Character Assessments</i>

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			landscape. Many tracks, green lanes, field boundaries and settlement patterns are remnants of past use and provide evidence of how the landscape has evolved over time. The objective of protecting and enhancing the landscape and recognition of its links to cultural heritage can help improve how the historic environment is experienced and enjoyed.	
	Natural Environment	Object	Make the link between green infrastructure and the natural environment. 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. 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 to improve the setting of historic buildings or historic townscape. 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.	<i>Add text to make the link between green infrastructure and the natural environment.</i>
P68	Policy 3	Object	We suggest adding the words, 'in accordance with the requirements of the NPPF either after historic environment or after historic asset.  Again change historic asset to heritage asset, the preferred term.  Suggest separate policy for Natural Environment	<i>Add the words, 'in accordance with the requirements of the NPPF either after historic environment or after historic asset.</i>  <i>change historic asset to heritage asset</i>

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				<i>separate policy for Natural Environment</i>
P69	Q22	Object	It is difficult to see whether the historic environment will be adequately covered without seeing the updated Development Management Policies. We would expect such policies to 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. This 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.	<i>Update Development Management policies to create a complete Plan.</i>
	Omission- Evidence base for Historic Environment and Topic Paper for the Historic Environment	Comment	<p>It is important that your plan is underpinned by appropriate evidence. We would recommend that the following evidence for the historic environment is used in the preparation of your Local Plan.</p> <p>Any evidence base should be proportionate. However, with a local plan we would expect to see a comprehensive and robust evidence base. Sources include:</p> <ul style="list-style-type: none"> <li>• National Heritage List for England. <a href="http://www.historicengland.org.uk/the-list/">www.historicengland.org.uk/the-list/</a></li> <li>• Heritage Gateway. <a href="http://www.heritagegateway.org.uk">www.heritagegateway.org.uk</a></li> <li>• Historic Environment Record.</li> <li>• National and local heritage at risk registers. <a href="http://www.historicengland.org.uk/advice/heritage-at-risk">www.historicengland.org.uk/advice/heritage-at-risk</a></li> <li>• Non-designated or locally listed heritage assets (buildings, monuments, parks and gardens, areas)</li> <li>• Conservation area appraisals and management plans</li> <li>• Historic characterisation assessments e.g. the Extensive</li> </ul>	

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			<p>Urban Surveys and Historic Landscape Characterisation Programme or more local documents.  <a href="http://www.archaeologydataservice.ac.uk/archives/view/EUS/">www.archaeologydataservice.ac.uk/archives/view/EUS/</a></p> <ul style="list-style-type: none"> <li>• Environmental capacity studies for historic towns and cities or for historic areas e.g. the Craven Conservation Areas Assessment Project.  <a href="http://www.cravencdc.gov.uk/CHttpHandler.ashx?id=11207&amp;p=0">www.cravencdc.gov.uk/CHttpHandler.ashx?id=11207&amp;p=0</a></li> <li>• Detailed historic characterization work assessing impact of specific proposals.</li> <li>• Heritage Impact Assessments looking into significance and setting especially for strategic sites or sites with specific heritage impacts</li> <li>• Visual impact assessments.</li> <li>• Archaeological assessments.</li> <li>• Topic papers.</li> </ul> <p>There would appear to be a lack of heritage evidence to date. It is important that your plan is built on a sound and robust evidence base.</p> <p>We advise you to carefully consider the list above.</p> <p>We advocate the preparation of a topic paper in which you can catalogue the evidence you have gathered and to show how that has translated into the policy choices you have made. Do this from the start, as a working document, that you add to throughout the plan preparation process, not just before EiP.</p> <p>It is also useful to include in this a brief heritage assessment of each site allocation, identifying any heritage issues, what you have done to address them and how this translates into the wording in your policy</p>	

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			for that site allocation policy.	
P91	The City Centre Para 271	Support	This section recognises the unrivalled historic environment of the historic city centre which is welcomed.	
P91	Para 273	Support	We welcome the reference to the need to make the best use of its distinctive assets.	
P91	Para 274	Object	Bullet point 2 should be amended to read conserving and enhancing the historic and natural environment to more closely reflect the NPPF	<i>Amend second bullet point to read conserving and enhancing the historic and natural environment</i>
P92	The Northern City Centre	Object	<p>Historic England recognise that this area contains a number of key brownfield sites and understand the importance of regeneration in the area for the city as a whole.</p> <p>The allocation proposes the redevelopment of Anglia Square at a density similar to that proposed in the planning application currently before the Secretary of State. We consider that any development of the scale envisaged would cause a high degree of harm to the character and appearance of the City Centre conservation area, as well as harm of varying degrees to many designated heritage assets, including some of the city's most important.</p> <p>Evidence prepared by Historic England for the Inquiry suggested that 600 dwellings, rather than 1200 would be a more appropriate scale. Historic England has also expressed fundamental concern regarding the proposed landmark building and in particular its height. The Norwich skyline is important to the character of the town as a whole and in particular the City Centre Conservation Area. For a number of years we have stated that development should not break the skyline in the City.</p> <p>There are clearly differences of opinion in relation to this site in particular but a number of key principles can be drawn from this case</p>	<p><i>Include key principles for development within the Plan.</i></p> <p><i>Review policy in light of Inspectors findings.</i></p>



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			<p>and applied to other redevelopment sites in the City.</p> <p>They are as follows:</p> <ul style="list-style-type: none"> <li>• Development should be of a scale and massing in keeping with the surrounding area;</li> <li>• Development should respect and reinterpret the historic grain, street layouts, burgage plots and morphology of the City;</li> <li>• Development should avoid breaking the skyline or competing with historic landmark buildings across the City;</li> <li>• Development should use materials in keeping with the historic fabric of the City.</li> </ul> <p>It will be necessary to review the policy in the light of the Inspectors findings in relation to Anglia Square.</p>	
	East Norwich	Object	<p>We recognise the opportunities provided in East Norwich for brownfield regeneration.</p> <p>One of our key concerns in this area relates to Carrow Works (Abbey/Priory). We have set out in more detail our concerns in Appendix B in relation to this site but in summary, we question the capacity of the site and suggest that a more detailed Heritage Impact Assessment be undertaken before the next draft of the Plan to inform the suitability or otherwise of the site, the likely impact of development upon the significance of heritage assets, the extent of the developable area and hence capacity of the site, any necessary mitigation or enhancements that could be made and then any changes required to policy wording.</p>	<i>Undertake detailed HIA for Carrow Works site.</i>
P97	Policy 7.1	Object	Historic England has some concerns regarding the housing figures.	<i>Amend housing figures if necessary</i>

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	Housing figures		<p>In particular the figures provided in the table for housing include those for both Anglia Square (awaiting the Inspector's decision) but it is Historic England's view that the capacity of that site is closer to 600 than 1200 dwellings) and the Carrow Works (where we have suggested caution regarding the capacity of the site and have requested that a more detailed HIA be undertaken to more carefully consider the likely impact of development upon heritage assets and thus the likely capacity of the site).</p> <p>Whilst we consider that it will be possible to achieve high densities on brown field sites compared with the densities of many parts of the city, it would not be appropriate to seek the densities associated with very tall buildings in metropolitan areas.</p> <p>We appreciate the emphasis in national policy on high density development in sustainable locations but highlight paragraph 11b and footnote 6 of the NPPF which states that there may be circumstances where the application of policies in the framework that protect areas or assets of particular importance (including designated heritage assets) provides a strong reason for restricting the overall scale, type or distribution of development in the plan area.</p> <p>Historic England consider that Norwich's historic character is under pressure from recent developments permitted without or against our advice (Pablo Fanque House, new student accommodation below St. Giles) and by proposals such as those for Anglia Square.</p> <p>We are concerned at some of the indicative site capacity figures given in the site allocations (and contributing to this table).</p> <p>One of the first questions any Inspector will ask at EiP concerns the</p>	<p><i>following the Inspectors decision on Anglia Square and upon completion of an HIA for Carrow Works.</i></p> <p><i>Prepare an evidence base document to consider indicative site capacities of allocations.</i></p>

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			<p>capacity of the sites to accommodate the level of development indicated in the Plan.</p> <p>To that end we consider that it is essential evidence base document is prepared outlining the site capacities and the assumptions that have been made in reaching these figures, particularly for the sites in the City. The evidence should set out the indicative site capacity, site area, density (as dwellings per hectare dph), assumed maximum height, surrounding heights of development, other on site and off site capacity considerations (e.g. heritage, natural environment etc.). This will provide a helpful starting point for us to be able to consider whether the indicative site capacities are justified, realistic and achievable in terms of their impact upon the historic environment (and other factors).</p> <p>We refer you to our publication, '<b>Increasing residential density in historic environments</b>' which can be found <a href="#">here</a>. This study explores the factors that can contribute to successfully delivering developments which increase residential density in historic environments. It uses a combination of literature review and case studies to provide a series of recommendations to support decision making. In addition we commend the work by Ash Sakula in relation to Anglia Square and the demonstration of how that particular site could be developed at high density whilst respecting the historic environment.</p>	
P98			<p>Historic England broadly supports redevelopment of brownfield sites both in the City Centre, (including the northern city centre), east Norwich and the wider urban area. However, all such development should conserve and enhance the historic environment and be of an appropriate scale and massing, reflecting the grain and historic street</p>	

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			patterns of the City.	
P100	5. The Natural and Built Environment	Object	<p>We suggest that this section should also refer to the historic environment in the title to read, The built, natural and historic environment.</p> <p>We suggest that the first word of the first sentence should be To rather than The.</p> <p>We broadly welcome bullet points one and two.</p> <p>We suggest the addition of the following bullet points as key principles of development:</p> <ul style="list-style-type: none"> <li>• Development should be of a scale and massing in keeping with the surrounding area;</li> <li>• Development should respect and reinterpret the historic grain, street layouts, burgage plots and morphology of the City;</li> <li>• Development should avoid breaking the skyline or competing with historic landmark buildings across the City;</li> <li>• Development should use materials in keeping with the historic fabric of the City.</li> </ul> <p>We have concerns regarding bullet point 3 which encourages landmark buildings at the gateways to the city centre. While landmark buildings are not necessarily an issue per se, invariably such buildings are often tall and out of scale with the surrounding area. The particular skyline and historic setting of the city of Norwich as a whole means that the area is particularly sensitive to such development. Any such development must be of an appropriate scale</p>	<p><i>Amend title to read, The built, natural and historic environment.</i></p> <p><i>The first word of the first sentence should be To rather than The.</i></p> <p><i>Suggest the addition of the following bullet points as key principles of development:</i></p> <ul style="list-style-type: none"> <li>• <i>Development should be of a scale and massing in keeping with the surrounding area;</i></li> <li>• <i>Development should respect and reinterpret the historic grain, street layouts, burgage plots and morphology of the City;</i></li> <li>• <i>Development should avoid breaking the skyline or competing with historic landmark buildings across the City;</i></li> <li>• <i>Development should use materials in keeping with the historic fabric of the City.</i></li> </ul> <p><i>Delete bullet point 3 in relation to</i></p>

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			and not harm the significance of heritage assets including for example the City Centre Conservation Area through development within its setting. To that end we recommend the deletion of bullet point 3.	<i>landmark buildings.</i>
P101	Bullet point 4	Object	We welcome bullet point 4 in relation to heritage assets. We suggest the use of the word including before Carrow as there are other heritage assets besides those listed.	<i>We suggest the use of the word including before Carrow as there are other heritage assets besides those listed.</i>
P103 – P105	Policy 7.2	Object	We recommend including something on the individual characters of the main settlements in this section.	<i>Include something on the individual characters of the main settlements</i>
P119 - 130	Appendix 2 Glossary	Object	Add in definition for Listed Building and Local List and Registered Park and Garden. Change Scheduled Ancient Monument to scheduled monument for the reasons set out above.	<i>Add in definition for Listed Building and Local List and Registered Park and Garden. Change Scheduled Ancient Monument to scheduled monument</i>
	Omission Policy for tall(er) buildings and scale and massing	Object	<p>We also consider that it is essential that a tall buildings study is undertaken to provide the evidence base and contribute towards the development of an appropriate tall(er) buildings policy for the Plan. Ideally this should also consider the question of massing. The study should investigate the important key views of the city, the skyline as a whole and the contribution that makes to the Conservation Area and the wider historic environment and should establish if there is scope for tall(er) buildings and if so where and where not.</p> <p>Our advice note in relation to tall buildings provides further guidance in this respect Tall buildings – Advice Note 4 <a href="https://historicengland.org.uk/images-books/publications/tall-buildings-advice-note-4/">https://historicengland.org.uk/images-books/publications/tall-buildings-advice-note-4/</a></p>	<p><i>Include policy for tall(er) buildings.</i></p> <p><i>Undertake evidence base study on tall(er) buildings, massing and the skyline.</i></p>

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			<p>A revision of our advice note is currently out for public consultation and can be found here <a href="https://historicengland.org.uk/whats-new/news/tall-buildings-advice-consultation/">https://historicengland.org.uk/whats-new/news/tall-buildings-advice-consultation/</a></p> <p>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 of the character and significance of the City.</p>	
	Omission – Policy for Design	Object	<p>The Plan, as currently drafted, lacks policy provision for design. We appreciate that this may sit within a review of development management policies. However, given our comments regarding the need to review the DM policies too, we include comment here in relation to design. We strongly encourage provision for the historic environment throughout the plan, not solely within heritage focused policies. Most particularly, we seek a specific requirement for consideration of the historic environment within the design policies of the local plan which should seek to draw on opportunities offered by the historic environment and reflect local character and distinctiveness. This should not stymie contemporary development but should require an appreciation of the significance and character of the historic environment in producing a high standard of design.</p> <p>We highlight the recent publication Building Better Building Beautiful Commission report which may help shape your policy in this area.</p>	<i>Include policy for design in Plan.</i>