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Our ref: PL0022531

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Dear Mr Burrell

**Greater Norwich Local Plan Draft Strategy- Regulation 19. March 2021**

Thank you for consulting Historic England on the Greater Norwich Local Plan Regulation 19 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, 4.12.1, 26.4.19 and 16.3.20. 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, 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.

In line with paragraph 185 of the National Planning Policy Framework (NPPF) it is important that the Plan should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats.





The Plan has been strengthened since the previous draft to ensure a more positive strategy for the historic environment. However there are some key areas of the Plan and the supporting evidence base that require further improvement to ensure that the Plan is sound. We have a number of concerns: we will identify those areas of the Plan that we consider to be unsound and set this out in our comments below and in the attached appendices.

### **Changes to the Plan from Reg 18 to Reg 19 to afford greater protection to the historic environment**

We welcome many of the changes you have made in response to our comments at Regulation 18. There have been significant improvements to the wording of some of the strategic policies (notably policies 3 and 7.1) to afford greater protection to the historic environment.

In addition we appreciate the many changes you have made to policy wording for site allocations, amending or adding criteria that specifically relates to heritage assets.

These changes have helped to provide a more robust Plan and a more positive strategy for the Historic Environment, as required by paragraph 185 of the NPPF.

### **Remaining issues in relation to the soundness of the Plan and the protection of the historic environment**

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:

#### **1. Insufficient Evidence base to support and justify the policies in the Plan**

We continue to highlight that there is insufficient evidence to justify the policies in the Plan. There are 3 inter-related areas where we consider there needs to be more evidence:





**a) Site allocations – site assessment including Heritage Impact Assessment**

In our regulation 18 response and in subsequent discussions with the Council, we have made it clear that we do not consider there to be sufficient evidence in relation to the historic environment to support the site allocations.

Whilst we see that some of the HEELA and site assessments have been revisited, we still find the assessments lacking. They do not follow the five step methodology for site assessment set out in Historic England's advice note on Site Allocations.

Therefore we continue to advise that **Heritage Impact Assessments (HIAs) should be prepared to provide a suitable evidence base for the Plan. We advise that these should be prepared in advance of the EiP. This is a matter of priority, given the timetable for the Plan.**

We had previously requested HIAs of all sites – but in view of time and capacity constraints, we had agreed with the Council a shorter list of key sites to focus upon. In our view, the key sites requiring HIA are **GMLP0409R, GMLP3053 GMLP3054, GMLP 0506, GMLP0125, GMLP2143, GMLP2019 and GMLP0133B and D**. We also suggest HIAs for the following new sites **GMLP0596R, GMLP0253 and GMLP0581/2043**.

**b) Indicative Site Capacity**

Following on from that, we are still concerned that **some of the indicative capacities for site allocations are unrealistic**. 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 needs to take into account the historic environment and historic character of 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). This could be informed by the Heritage Impact Assessments (see above) and the taller buildings study (see below).

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

Having reviewed the adopted development management policies and also City Centre Conservation Area appraisal, we consider that there is still **insufficient policy framework in relation to the matter of taller buildings and their**





**effect on the skyline.** Given the level of growth anticipated by the Plan, we consider this to be an important strategic issue that should form part of this Plan.

We continue to suggest that you **undertake a tall buildings study in advance of the EiP** to provide the evidence base and contribute towards the development of an appropriate tall(er) buildings policy for inclusion in the Plan. This should include a consideration of the impact of taller buildings on the significance of the historic environment.

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.

We would welcome the opportunity to discuss the development of a policy approach to taller buildings in more detail with you.

## **2. Changes required to policy wording to make the Plan sound**

### **a) Historic Environment Policy (Policy 3)**

We welcome the changes to Policy 3 but there are a number of further changes needed to make this policy sound.

### **b) Key principles for development of City sites – (Policy 7.1)**

We broadly welcome the changes made to this policy to afford greater protection to the historic environment but again there are a number of further changes needed to make this policy sound.

### **c) Policy wording for some site allocations**

As highlighted above the policy wording for the vast majority of site allocations is now much improved. There are just a few remaining areas that require additional wording. The HIAs, once prepared, should also inform the policy wording.

Further detail on the above points is given in the attached tables, Appendix A and B.

### **Other minor changes to the Plan**

We have also suggested a series of other changes to the Plan in the attached tables. 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 the wording in the plan.





## **Sustainability Appraisal**

We have reviewed the Sustainability Appraisal. The Appraisal identifies significant adverse effects for the historic environment for a number of sites in the pre-mitigation assessment.

In looking at the assessment it would appear to be largely distance based in its approach and doesn't really explore issues of impact on heritage significance. In the absence of the HIAs that we had suggested were produced, it is difficult to make these judgements. We therefore have some concerns about the approach taken in the Sustainability Appraisal in respect of the historic environment.

## **Conclusion**

Although we appreciate that there have been many changes made to the Plan in response to our comments at Regulation 18 which is welcome, there are still a number of fundamental issues which make the Plan unsound. In particular, a lack of robust evidence base for the historic environment means that the plan is not sufficiently justified. Secondly, we note that a number of changes to policy wording are required to ensure that the Plan is consistent with the NPPF.

## **Closing comments**

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 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, particularly in relation to further evidence in the form of HIAs, taller buildings study and capacity study. We





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would urge you to address these issues soon. Rushing the plan through without a robust evidence base is likely to be counterproductive and could result in delays at EiP.

In the meantime we look forward to continuing to work with you and your colleagues. We would also ask that you engage with us in the preparation of a Statement of Common Ground, well in advance of the EiP so we can seek to resolve many of these outstanding issues.

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