

## 2021 Appendix A: Table of Historic England’s comments on the Draft Greater Norwich Local Plan – Regulation 19

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

Page	Section	Sound/ Unsound Comment	Comments	Suggested Change
	<b>Section 1</b>			
9	Para 24 – Insufficient policy framework for taller buildings /heritage at risk	Unsound	<p>You will be aware that we have raised some concerns regarding the fact that you are not proposing to update the Development Management policies at this stage during the Reg 18 consultation and in subsequent meetings.</p> <p>Whilst paragraph 20 of the Reg 18 Plan left open the possibility for some limited amendment to such policies, and we had also previously been told at Reg 18 that the DM policies would be reviewed in advance of the Reg 19 Plan, this now no longer seems to be the case.</p> <p>Indeed the new text in paragraph 24 makes it clear that the GNLP will be used in conjunction with the existing adopted Development Management Policies.</p> <p>Whilst we accept that this is a perfectly acceptable approach to Plan review, and indeed many of the policies set out in the existing adopted Development Management Plans and the City Centre Conservation Area Appraisal are good and valuable, Historic England continues to have concerns that this still leaves some policy areas lacking.</p> <p>In particular we are concerned that there is a lack of strategic policy framework for taller buildings and the skyline, the detailed approach to designated and non-designated heritage assets and heritage at risk.</p> <p>Please review these policy areas and ensure the Plan provides sufficient</p>	<p><i>Ensure taller buildings and heritage at risk as well as designated and non- designated heritage assets are appropriately covered in the GNLP.</i></p> <p><i>See comments in relation to taller buildings and policy 3.</i></p>

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			policy coverage of these important matters. More detail on these is given later in this table under policy 3 and comments on taller buildings.	
	<b>Section 2</b>		<b>Greater Norwich Profile</b>	
27-28	Paras 104 – 107 and Table 3	Unsound	<p>We welcome the changes made in these paragraphs to better reflect NPPF terminology (scheduled monuments, heritage assets and Registered Parks and Gardens) as well as the additional sentence referencing the city centre's current street pattern reflecting historic influences.</p> <p>We continue to suggest reference to what heritage is at risk and historic landscape characterisation.</p>	<i>Please add a sentence in relation to heritage at risk and also historic landscape characterisation.</i>
	<b>Section 3</b>		<b>The Vision and Objectives for Greater Norwich</b>	
34	Para 125	Unsound	We continue to suggest that you 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. Alternatively you could use the term heritage assets in line with the NPPF.</i>
37	Para 147	Unsound	<p>We welcome the reference to the protection and enhancement of distinctive local characteristics of our city, towns and villages and their separate identities. This is a really important aspect of ensuring a positive strategy for the historic environment in your Plan in line with para 185 of the NPPF. We also welcome the reference to high quality, well designed and beautiful new development picking up on the Building Better Building Beautiful report.</p> <p>However, this paragraph should also refer to landscape.</p>	<i>Also refer to distinctive landscapes.</i>
	<b>Section 4</b>		<b>Climate Change</b>	
42-44	Para 156 ff and table	Unsound	<p>There is currently no reference to the question of climate change and the historic environment. It might be appropriate to include some reference to this in this section of the Plan.</p> <p>Listed buildings, buildings in conservation areas and scheduled</p>	<i>Include reference to climate change in historic environment here</i>

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			<p>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.</p> <p>In developing policy covering this area you may find the Historic England guidance <i>Energy Efficiency and Historic Buildings – Application of Part L of the Building Regulations to historically and traditionally constructed buildings</i> <a href="https://historicengland.org.uk/images-books/publications/energy-efficiency-historic-buildings-ptl/">https://historicengland.org.uk/images-books/publications/energy-efficiency-historic-buildings-ptl/</a> to be helpful in understanding these special considerations.</p>	
	<b>Section 5</b>		<b>The Strategy</b>	
59 - 65	Policy 2 Sustainable Communities	Unsound	<p>We welcome the new reference to the historic environment in Policy 2 and Table 8. These are helpful additions to the policy.</p> <p>Policy 2 would be further improved with specific reference to conservation area appraisals in criterion 5 to read</p> <p>...taking account of landscape or historic character <u>assessments including conservation area appraisals, design guides and codes</u></p>	<p><i>Amend criterion 5 of policy 2 to read,</i></p> <p>...taking account of landscape or historic character <u>assessments including conservation area appraisals, design guides and codes</u></p>
66	Para 202-203	Unsound	<p>The NPPF requires Plans to include a positive strategy for the historic environment (para 185). We continue to suggest that you include 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 it is that we need to protect and enhance.</p>	<p><i>Add more description about what is distinctive/unique etc. about the historic environment of the Norwich and the surrounding area. It is important that the plan is locationally specific and provides more than generic policies and guidance that</i></p>

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				<i>simply repeat national policy.</i>
66	Para 203, 205, 208	Unsound	Replace historic assets with heritage assets in line with the terminology used in the NPPF.	<i>Replace historic assets with heritage assets</i>
66	Para 204	Unsound	<p>We broadly welcome reference to guidance including landscape character assessments conservation area appraisals, listed building and scheduled monuments information and archaeological records.</p> <p>We note reference to heritage impact assessments. We would comment that HIA at planning application stage does not negate the need for Heritage impact assessments for inform site allocations. More on this issue in relation to the site allocations section of the Plan (see Appendix B of our response).</p> <p>Amend scheduled ancient monuments to scheduled monuments, the preferred NPPF term.</p>	<i>Amend scheduled ancient monuments to scheduled monuments, the preferred NPPF term.</i>
66	Para 207	Unsound	At the start of this paragraph, make the point that harm should be avoided in the first instance.	<i>State that harm should be avoided in the first instance.</i>
67	Para 208	Unsound	<p>We welcome reference in this paragraph to Heritage at Risk. In this paragraph</p> <p>Although this paragraph now references Heritage at Risk, there is still no specific mention within the policy. We strongly suggest that Heritage at Risk is specifically mentioned in policy 3.</p>	<i>Add a sentence on Heritage at Risk to Policy 3.</i>
68	Para 222	Unsound	<p>We welcome the addition of this paragraph which mentions the relationship between Green Infrastructure and the historic environment.</p> <p>We suggest replacing Historic Environment assets with heritage assets, the preferred term and in line with the NPPF.</p> <p>The paragraph could be strengthened by adding the following wording:</p>	<p><i>Replace 'historic environment assets' with 'heritage assets'.</i></p> <p><i>Add text in relation to the role of green infrastructure in relation to the historic environment to read,</i></p> <p><i>'Green Infrastructure can have a role</i></p>

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			<p>Green Infrastructure can have a role 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.</p>	<p><i>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.'</i></p>
72	Policy 3 Environmental Protection and Enhancement	Unsound	<p>This policy is quite generic and could be a policy for anywhere in the country. We suggest that you make the policy more locally specific in order to make a positive contribution to local character and distinctiveness in the Greater Norwich Area .</p> <p>Bullet point 1 Whilst we broadly welcome the requirement for heritage impact assessment to accompany proposals for development, more fundamentally, HIA is also needed to inform the Plan making process, the suitability of the site per se and any particular capacity issues/design criteria that should be included in the Plan. HIA to inform planning application is not a substitute for HIA at plan making stage.</p> <p>Bullet point 2 The second bullet point requires amendment. Harm should be avoided in the first instance. Only where harm cannot be avoided should we move on to consider the tests and weighing exercise as set out in the NPPF.</p> <p>And the tests are more subtle than is implied here which just talks about outweighing. Of course, we know that: a) <b>Substantial harm</b> requires <b>substantial public benefits</b> that</p>	<p><i>Make the policy more locally specific.</i></p> <p><i>Suggest reordering bullet points, 2, 1, 3.</i></p> <p><i>Bullet point 1 We re-iterate our advice that HIAs are required to inform site allocations and as part of the evidence base for the Local Plan. These need to be completed before the EiP.</i></p> <p><i>Amend bullet point 2 to more properly reflect the tests in the NPPF. You could add the phrase, 'in accordance with the requirements of the NPPF'.</i></p> <p><i>Amend bullet point 3 to also specifically refer to heritage at risk.</i></p> <p><i>Include a separate paragraph in the</i></p>

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			<p><b>outweigh the harm</b></p> <p>b) Whereas for <b>less than substantial harm, public benefits are weighed against.</b></p> <p>c) And for <b>non-designated heritage assets a balanced judgement</b> is required.</p> <p>You could add the phrase, 'in accordance with the requirements of the NPPF' to help clarify the position.</p> <p><b>Bullet point 3</b></p> <p>Expand this bullet point to make specific reference to the need to address Heritage at Risk.</p> <p>Include a separate paragraph in the policy after 'importance of the heritage asset.' To read, 'The Councils will maintain and update the Heritage at Risk Register and develop a strategy for addressing Heritage at Risk.'</p>	<p><i>policy after 'importance of the heritage asset.' To read, 'The Councils will maintain and update the Heritage at Risk Register and develop a strategy for addressing Heritage at Risk.'</i></p>
	Omission Historic Landscape Characterisation	Unsound	<p>There is still no reference to Historic Landscape Characterisation in the Policy. We again 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 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.</p>	<p><i>Add reference (policy and text) to Historic Landscape Characterisation and Landscape Character Assessments</i></p>
	Evidence base for Historic	Unsound	<p>It is important that your plan is underpinned by appropriate evidence. We would continue to recommend that you review the list of types of</p>	<p><i>Ensure sound evidence base for the historic environment in advance of</i></p>

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	Environment and Topic Paper for the Historic Environment		<p>evidence that we outlined to you in our Reg 18 response. We advise you to carefully consider the list we sent through (see letter dated 16.3.20).</p> <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. Any evidence base should be proportionate.</p> <p>In particular we would highlight the need for a historic environment topic paper, Heritage Impact Assessments of certain sites and also taller buildings evidence base.</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><i>EiP</i></p> <ul style="list-style-type: none"> <li>a) <i>Prepare a topic paper for the historic environment</i></li> <li>b) <i>Prepare HIAs for selected sites</i></li> <li>c) <i>Prepare taller buildings study to inform strategy</i></li> <li>d) <i>Prepare capacity of sites evidence base document</i></li> </ul>
95	Paragraph 312	Sound	We welcome the reference at bullet point two to conserving and enhancing the historic and natural environment.	
96	The Northern City Centre	Unsound	<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>We note the amendments made to the Anglia Square site allocation policy and also to policy 7.1 to reference some of the key principles for development in this area. However, we continue to have some significant concerns regarding the approach to development at Anglia Square and the lack of HIA evidence to inform the allocation. Further more detailed comments are provided in relation to policy 7.1 and site allocation policy GNLP0506.</p>	<i>Undertake detailed HIA for Anglia Square site.</i>
99	East Norwich	Unsound	We recognise the opportunities provided in East Norwich for brownfield regeneration.	<i>Undertake detailed HIA for Carrow Works site and wider East Norwich</i>

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			<p>However, 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>	<p><i>area.</i></p>
102	Policy 7.1 Housing figures	Unsound	<p>Historic England raised concerns regarding some of these housing figures at the Regulation 18 consultation. At the time, we specifically requested HIAs for a number of sites to test and inform the capacity of sites in the Local Plan. These HIAs have not been completed, calling into question the accuracy of the capacity of some of these sites.</p> <p>It would be helpful to know which sites in addition to Anglia Square contribute to the 1558 commitment for the Northern City Centre Area, in order to properly assess whether this is realistic.</p> <p>We note that the figures for East Norwich have doubled from 2,000 to 4,000 dwellings. In the absence of Heritage Impact Assessment, it is difficult to say whether this uplift in capacity is realistic.</p> <p>To that end, we find the Plan unsound as it is not justified since it is not based on sufficient evidence in relation to the historic environment.</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. See separate comment on capacities of</p>	<p><i>Prepare HIAs of key sites to inform site capacity and amend figures accordingly if necessary..</i></p>



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			sites at Appendix B.	
105	Policy 7.1 The City Centre Criterion 5. Built, Natural and Historic Environment	Unsound	<p><b>Title</b> We welcome the change to this title to specifically reference the historic environment.</p> <p><b>First sentence</b> Again this is very generic – please make this more locationally specific to Norwich</p> <p><b>Bullet point 2</b> We welcome the amplification of the second bullet point to include reference to scale mass, height, layout and materials as well as the reference to the character of the Conservation Area and the City Centre Conservation Area Appraisal. We suggest that wording of this criterion is amended and re-ordered to read, <i>New development proposals will respect the character of the city centre conservation area and address the principles set out in the City Centre Conservation Area Appraisal (or any successor), Heritage Impact Assessments and the Taller Buildings and the Skyline Study in particular in relation to scale, mass, height, layout and design. New development will be sustainable and, where appropriate, innovative design.</i></p> <p>We also welcome the deletion of the bullet point in relation to landmark buildings.</p>	<p><i>First sentence – make more locationally specific to Norwich</i></p> <p><i>We suggest that wording of this criterion is amended and re-ordered to read, ‘New development proposals will respect the character of the city centre conservation area and address the principles set out in the City Centre Conservation Area Appraisal (or any successor), Heritage Impact Assessments and the Taller Buildings and the Skyline Study in particular in relation to scale, mass, height, layout and design. New development will be sustainable and, where appropriate, innovative design.’</i></p>
105-106	East Norwich Bullet point 7	Unsound	<p>We again register our concern regarding the doubling of the housing figure from 2000 – 4000 for this area. We question whether this is realistic, in light of historic environment considerations. Again we suggest an HIA is prepared to more properly inform the capacity of these sites and assess the potential impact on the historic environment.</p> <p>We welcome 7<sup>th</sup> bullet point in relation to heritage assets. Whilst it is</p>	<p><i>Complete HIA in advance of EIP to inform capacity of area.</i></p>

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			unfortunate that specific reference to certain key heritage assets has been deleted, we welcome the fact that the policy wording recognises the need to protect not only heritage assets at the sites but also the wider city's heritage assets.	
107	Elsewhere in the urban area	Unsound	There is currently no reference to the need to conserve and enhance the historic environment within the list of bullet points for these areas. Amend the Plan to include a bullet point in relation to the historic environment.	Amend the Plan to include a bullet point in relation to the historic environment.
120 - 121	Policy 7.6	Unsound	<p><b>Evidence base for planning for new settlements</b></p> <p>We note that the authorities are planning for new settlements in the next Plan cycle. We strongly advise that sufficient evidence in relation to the historic environment is prepared to inform the choice of new settlement.</p> <p>We would expect a Heritage Impact Assessment to be undertaken for each of the proposed new settlements in order to assist in comparing the different options and selecting a preferred option..</p> <p>We would then expect more detailed heritage impact assessment of the chosen site to inform the allocation itself e.g. capacity, extent of developable area, areas of open space, landscaping etc. required as heritage mitigation.</p> <p>We note that reference is made to Garden City Principles in paragraph 398. Whilst Historic England broadly welcomes new settlements, it is important that these are carefully located and planned with respect to all three strands of sustainable development. One of the strands of sustainable development includes the protecting and enhancing the historic environment.</p> <p>Landscape (including landscape character areas and historic landscape characterisation) and heritage assets should be considered from the</p>	<p><i>In preparing for a new settlement we strongly advise that sufficient evidence in relation to the historic environment (including a Heritage Impact Assessment) is prepared to assist in the new settlement site selection process.</i></p> <p><i>Policy 7.6 could make it clear what types of evidence will be needed, including heritage impact assessment.</i></p>

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			<p>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.</p> <p>Many Local Plans state that new settlements should come forward as a new 'Garden Village' based on the Town and Country Planning Association's principles for Garden Cities. 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.</p> <p>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,</p> <p>"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".</p> <p>(Emphasis added, pg. 100)</p> <p>In drafting your principles for the development of new garden</p>	

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			communities, we would suggest that you ensure that reference is made to the need to conserve and enhance the historic environment.	
127 - 137	Appendix 2 Glossary	Unsound	We continue to suggest that you add in definitions 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 sale and massing	Unsound	<p>We still consider that there is a need for a taller buildings policy to be included in the GNLP Plan. This should be based on a study/evidence base that looks not only at your existing policy framework but that also explores the issue of the wider city skyline. In our view, this is a key policy area that needs to be addressed in the strategic Plan.</p> <p>We appreciate that you have now included some reference to height at Policy 7.1 in relation to City Centre criterion 5 which is welcome. However, the issue relating to height is not exclusive to the City Centre area.</p> <p>We understand from our meetings that you are not proposing to address this issue through the Greater Norwich Local Plan but instead Norwich City are considering doing a 3D modelling study of the City and update to the Conservation Area appraisal. We understand that this work is likely to feed into future Development Management Local Plan revisions, or a plan under the proposed new system, rather than the current GNLP.</p> <p>However, in our view this is insufficient, particularly given the current growth pressures in Norwich. We continue therefore to recommend 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 this Plan. Ideally this should also consider the question of massing.</p>	<p><i>Undertake evidence base study on tall(er) buildings, massing and the skyline.</i></p> <p><i>Include policy for tall(er) buildings and the skyline in the Plan.</i></p> <p><i>We would be happy to explore this matter with you further.</i></p>

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			<p>The study should investigate the important key views of the city, the skyline as a whole and the contribution that makes to the Conservation Areas and the wider historic environment. It 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>A revision of our advice note is was out for public consultation last year. <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>The Plan should then include a policy for taller buildings and the skyline.</p>	
	Policy for Design	Sound	<p>In our Reg 18 response we raised concerns in relation to lack of policy framework in relation to design and the historic environment</p> <p>We therefore welcome the changes made to the plan in relation to design, local character and the historic environment.</p> <p>Table 8, issue 5 and policy 2 criterion 5 both provide a more considered approach to design and the relationship with local character, landscape, townscape and the historic environment which is welcomed.</p> <p>Likewise, the changes made to Policy 7.1, criterion 5, for the Norwich Urban Area and parish fringes also represent a marked improvement in this policy area.</p>	