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Dear Greater Norwich Local Plan Review Team

Greater Norwich Local Plan Scoping Consultation

Thank you for contacting Historic England about the Greater Norwich Local Plan Scoping Consultation. As the Government's adviser for the historic environment, we are keen to ensure that conservation and enhancement of heritage assets are taken into account at all stages and levels of the planning process

We provide an overview of the key issues, themes and opportunities afforded by the historic environment of the area before addressing the questions posed in the public consultation. We have also provided some more detailed comments in this letter as you embark upon the preparation of your Local Plan under the new plan-making system.

Greater Norwich heritage - key issues, themes and opportunities for the Local Plan

The city of Norwich, positioned in the east of Norfolk 17 miles from the coast, was first settled between the 5th and 7th centuries and at the time of the Norman Conquest the city was one of the largest in England. It is characterised by extant mediaeval architecture, such as the Romanesque 11th century Cathedral. The city is particularly notable for its many churches; during the Mediaeval period, there were 57 within the city walls more than any city north of the Alps, 31 of which still exist. Norwich Castle was founded by William the Conqueror between 1066 and 1075 and was controversially repaired and refaced in Bath stone in the 1830s, standing as an early attempt to redevelop a heritage asset in a sensitive manner. Portions also remain of the 4km long city walls, constructed in the late 13th and early 14th century and originally surrounding a larger area than the City of London.

Alongside this is much Victorian and 20th-century construction facilitated by the arrival of the railways. Sites such as the Carrow Works are indicative of the importance of Greater Norwich within the food industry, whilst also presenting ample opportunity for heritage-led redevelopment. The University of East Anglia opened in the west of the city in 1963, bringing academic and economic growth to the region. It features 17 conservation areas, around 1500 listed buildings, 24 scheduled monuments, and 14 Registered Parks and Gardens. 8 of Norwich's churches sit on the Heritage at Risk register, threatening a central part of the historic character of the city.

Norwich is positioned between the gently undulating East Anglian plain, providing long sightlines of the city from afar, and the marshlands of the Broads. The Broads themselves push into the city, giving Norwich the unique status of sitting partially within a national park, and the River Wensum.

The Cambridge-Norwich tech corridor presents new opportunities for growth, but Norwich remains relatively isolated by infrastructure, with connections to Cambridge and the Midlands limited by railway capacity at Ely in Cambridgeshire. It also faces a challenge in meeting the housing need, placing additional pressure on the city to expand. It is therefore essential that the historic environment continues to be carefully managed in order to promote the most sustainable growth possible.

The district of Broadland sits generally to the north of Norwich. Consisting of 65 civil parishes, it includes the towns of Acle to the far east, Aylsham in the far north, Reepham, Sprowston, and Thorpe St. Andrew, as well as many villages dispersed throughout. Broadland has a diverse landscape, with the Broads stretching in from the east and the East Anglian plain from the west. This natural environment has shaped the historic environment, particularly through the vernacular architecture of the region, which relies heavily on locally available materials such as clay and flint. Several settlements have roots in the Roman occupation of Britain, but, having enjoyed prosperity in the 18th and early 19th centuries thanks to the wool trade, many of the towns maintain a Georgian and early Victorian architectural form, with characteristic Norfolk Red brick and clay roof tiles.

Notably, it contains 1021 listed buildings, 23 scheduled monuments, 4 Registered Parks and Gardens, and 20 conservation areas, with one in Acle sitting on the Heritage at Risk register.

Like much of Norfolk, Broadland is dominated by a series of elaborately stately homes, such as the Blickling Estate. The grade I listed Blickling Hall was the site of a manor belonging to Harold Godwinson; the iteration standing today is Jacobean with a local flavour through its ornamental chimneys and Dutch gables. Its gardens are grade II* listed, along with numerous other buildings throughout its grounds. This estate is just one part of a rich rural heritage inheritance across the region, illustrative of the history of wealth and splendour found in Norfolk.

Broadland's growth post-Industrial Revolution was restricted by its rural and semi-isolated character, something which remains true to this day, particularly with the target area for growth in the region remaining focussed on Norwich and the south-west of the Greater Norwich region. A primary challenge, then, continues to be promoting heritage-sensitive economic growth in the district, taking advantage of its numerous conservation areas and other heritage assets, which would in turn continue to allow the preservation of the historic environment in the region.

South Norfolk spans 119 civil parishes; its principal town is Wymondham in the north of the district, 10 miles south-west of Norwich. It contains a comparatively high number of heritage assets: 2964 listed buildings, 38 scheduled monuments, 7 Registered Parks and Gardens, and 52 conservation areas. Its history reaches back to the Neolithic, and many of its towns and villages enjoy a mix of medieval and 18th and 19th century architecture. Though flint is a less common vernacular building material in the district than the rest of the county, it does feature a

strong tradition of timber framing, as well as ornamental brickwork and clay lump. Clay tiling is a common roofing material, particularly with older buildings, and black glazed tiles are a particular feature of South Norfolk.

An area to the east of the district sits within the Broads, a unique man-made landscape which gives the region its own distinctive character, shaping the development of the historic environment. The Halvergate Marshes conservation area sits on the Heritage at Risk register. This large marshland contains many drainage mills, first developed in the early 17th century in response to saltwater flooding the Broads. This fusion between the historic and natural environment makes the Broads, and thus South Norfolk, unique.

It is for this reason that Historic England is keen to ensure that the emerging plan gives full consideration to the historic environment, both in the choice of site allocations and policy criteria for sites, as well as through a robust and clear suite of historic environment and other policies that seek to both protect but also enhance the historic environment.

We have reviewed the Scoping consultation material with a view to providing advice on heritage matters.

Public Consultation Questions

Question 1 – Are there any other key Strengths, Weaknesses, Opportunities or Threats that should be included in the SWOT analysis for Greater Norwich? Why?

We welcome the reference to the historic environment as a strength. We recommend referring to heritage assets rather than historic assets to use the NPPF terminology.

We consider heritage to be an opportunity, for example the conversion of historic buildings to provide homes.

Question 2 – Is there any other baseline data that we should consider when developing our SWOT and analysis of the key issues facing Greater Norwich?

We recommend referring to the following baseline data for the SWOT Analysis.

- National Heritage List for England [NHLE](#) You can download data from the NHLE through our [Open Data Hub](#)
- Historic Environment Record
- National and Local [Heritage at Risk](#) Registers
- Landscape Character Assessment
- Historic Landscape Characterisation
- Conservation Area Appraisal and Management Plans – update where needed
- Local List (NDHA) – criteria and list

There is a range of other evidence that you will need to support your plan. Some of this is already available while you will need to commission other new work as part of your proportionate evidence base. See our response to question 19.

Question 3 - Do you agree with the proposed broad structure of the GNLP 2045 above? [See bullet points below] If not, please suggest an alternative approach or approaches which could be taken to structuring the plan.

- The growth strategy and the settlement hierarchy
- Site allocations
- Locally specific policies – these will be a more limited number of locally specific policies than in previous local plans which will complement, and in a limited number of cases add to, national decision-making policies.

We welcome the proposed broad structure of the GNLP 2045 Plan. We provide further comments on locally specific policies in question 18.

Question 5

- **How can the GNLP 2045 support the development of brownfield sites?**
- **What development types would you support as part of our updated Growth Strategy?**

The Plan should include a for the re-use and conversion of historic industrial buildings. This will help to support the development of brownfield sites as part of the wider strategy for growth.

Question 11 - Should the GNLP 2045:

- Provide additional coverage of rural housing and development outside settlement limits beyond that contained in the draft NPPF?
- Retain aspects of existing local policy concerning housing outside settlement limits, such as self-build and custom-build housing, barn and other rural building conversions, replacement dwellings, the subdivision of existing dwellings, and dwellings connected to rural enterprises?

We welcome the inclusion of policies to support barn and other rural building conversions.

Question 13 - How should the GNLP 2045:

- help strengthen the city, town, district and local centres?
- deal with thresholds for retail impact assessments?
- address the evening and the late-night economy in the city centre?

Advice can be found on our website in relation to [historic towns and high streets](#) as well as our [Heritage Led Regeneration Toolkit and case studies](#)

Historic Shop Fronts:

High streets and retail in general are under considerable pressure at the present time. The Local Plan should seek opportunities to support High Streets and enhance the historic environment of these areas. The retention of original/historic or significant shop fronts

elements is often integral to the character of these buildings and that of the wider street scene.

The Local Plan should highlight the importance of retaining or restoring historic shop front features. This is both in terms of the positive contribution historic shop fronts make to the character of an area, but also the economic benefit of providing traditional and bespoke shopping units to shop owners.

A good example of how historic shop fronts can positively contribute to an area both aesthetically and economically is where Derby City Council teamed up with English Heritage (now Historic England) to help restore an area of Victorian and Edwardian shops, the Strand. The restoration of a number of shops within the area has meant that a previously underused section of the city provides bespoke shopping, now sees a much larger footfall and is considered to be a national success. The council have also seen a ripple effect of surrounding properties being restored.

Similarly, more recent [High Street Heritage Action Zones](#) throughout the country have seen similar benefits. Further advice in relation to Historic Town Centres and High Streets is provided [here](#).

Meanwhile or Flexible Uses: Strategies could consider meanwhile or flexible use.

Question 14 - How can the GNLP 2045 support the ongoing development of tourism, whilst responding sensitively to the local area?

There may be other opportunities for the plan to consider and capitalise on Greater Norwich's historic environment in supporting the ongoing development of tourism while ensuring that impacts are avoided or minimised.

Question 16 - How should the GNLP 2045 support

- Improved accessibility to housing, employment, services, sports and other community facilities?
- Delivery of wastewater treatment capacity and address nutrient neutrality?
- Clean power and net zero objectives?

Renewable Energy

The UK Government is encouraging local authorities and other organisations to put climate risk at the centre of decision making. Historic England is therefore supportive of renewable energy development and supports the inclusion of a policy for renewable energy.

Our advice note [Commercial Renewable Energy Development Historic Environment Advice Note 15](#) provides further advice on Local Plans and renewable energy including site selection and development of policies and maps in plans.

Historic Buildings – Energy and Carbon Efficiency

We also refer you to our recent advice note [Adapting Historic Buildings for Energy and Carbon Efficiency](#) and suggest including this link within this section.

Re-use of Buildings

In addition to heritage protection, there is also now further imperative to make the case for the reuse of buildings in order to meet carbon reduction targets and to support a low waste circular economy. We therefore recommend the inclusion of a policy to promote the re-use of buildings.

The greenest buildings already exist. The repair, maintenance, continued use and reuse of buildings is one of the easiest ways to avoid the unnecessary release of additional carbon and the generation of waste associated with demolition and new build.

The UK has the oldest building stock in Europe with around 21% of buildings constructed before 1919, and 80% of the buildings that will exist in 2050 have already been built. Historic buildings will play a critical role in helping the UK transition to a Net Zero society.

Question 17 - Should the GNLP 2045:

- **Set the most demanding local standards possible for water efficiency?**
- **Include higher or new standards for nature recovery and allocate sites for nature recovery or biodiversity enhancement?**
- **Identify sites for enhanced green infrastructure, including Suitable Alternative Natural Greenspace, and set local green infrastructure standards?**

The Plan should include appropriate policies for the protection and enhancement of green and blue infrastructure.

Historic England would highlight that Green and Blue Infrastructure should not only be considered in terms of the natural environment, health and recreation but also the role it can play in conserving and enhancing the historic environment. It can be used to:

- conserve and enhance heritage assets
- improve setting of heritage assets
- improve access to heritage assets
- create a sense of place and tangible link with local history
- create linkages between heritage assets and other green infrastructure

Conservation and enhancement of the natural environment is an important facet of sustainable development. There is an important synergy between the historic and natural environment. Countryside, landscape parks and the open spaces in our cities, towns and villages 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 refer 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 condition and setting of heritage assets and to improve access to them. Likewise, the historic environment can help contribute to the quality, character and distinctiveness of green spaces by helping to create a sense of place and a tangible link with local history.

Opportunities can be taken to link new GI networks into already existing green spaces in town or existing historic spaces such as churchyards 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.

Local Green Space can have the dual benefit of helping protect and enhance the setting of heritage assets. This potential synergy should be highlighted in the Plan. However, not all formal sports provision may have a positive impact on heritage – for example – it would not be appropriate to level a site to provide sports pitches where there is sensitive archaeology. Likewise, floodlights, changing room facilities etc may have a negative impact on the setting of heritage assets. Therefore, careful consideration is needed in this regard.

Question 18 - How should the GNLP 2045 plan for high-quality design that promotes sustainability and responds to local landscape and townscape character and the historic environment?

The introduction of National Development Management Policies (NDMPs) provides a valuable opportunity for the Local Plan to focus more strongly on place-specific matters and more locally specific policies, including the historic environment in the Greater Norwich Area. This means that there is the potential for policies that draw on the area's historic character, reinforce local distinctiveness, and promote heritage-led placemaking, ensuring that conservation and enhancement contribute positively to growth and identity.

The need to balance sustainable development with conserving and enhancing the historic environment will present a challenge, but the creation of the new local plan gives ample opportunity to embrace the rich and varied heritage of Greater Norwich through development that is sensitive to the historic environment.

We therefore recommend that careful consideration is given to preparing evidence-based policies in relation to the key themes outlined below. There may also be wider opportunities for the Plan to capitalise on Greater Norwich's historic environment, while avoiding or minimising harm, including in relation to archaeology, Heritage at Risk, tourism, town centres, and minerals.

We suggest that you consider developing policy approaches for the following:

- The historic environment, where there are issues or opportunities specific to Greater Norwich, including particular towns, villages, locations, or thematic areas requiring a tailored approach (including designated and non-designated heritage assets). This could also include policies to address Heritage at Risk. You may wish to consider including locally specific policies for some of the following themes:

- The potential for conversion of former industrial buildings, eg the legacy of the food and shoe industries such as Carrow Works and the many former shoe factory sites etc.
- Norwich City Parks
- The importance of Norwich City Walls,
- Norwich Skyline and key views together with building heights and densities
- The vernacular architecture of Greater Norwich, The influence of the Broads on historic development in the region.
- The prominence of windpumps/windmills in the landscape.
- Conserving and enhancing the settings of heritage assets of particular prominence, significance, and sensitivity (for example Blickling).
- A Local List
- Site allocation policies that account for the need to conserve and enhance heritage assets, informed by proportionate Heritage Impact Assessment, particularly in areas where significant growth is proposed (e.g. urban extensions or new settlements)
- Design policies, guides and codes that clarify how development should respond to local character, informed by evidence such as Conservation Area Character Appraisals and Management Plans, and assessments of building height and density.
- The re-use and retrofit of historic buildings.
- Approaches to flood risk management and climate change that take account of heritage assets and areas of historic character.
- Renewable energy policies and/or areas informed by proportionate evidence on the historic environment.

We strongly recommend that you update your Conservation Area Appraisals to inform future development and change. Other sources of information and advice include:

- [National Design Guide](#) and [National Model Design Code](#) or replacement guidance e.g. emerging Planning Practice Guidance on Design

Suggested guidance

There is a wide range of advice and guidance that can assist you in preparing the Local Plan, such as:

- Historic England's [Good Practice Advice Note on the Historic Environment in Local Plans](#)
- Historic England's Advice Note 3 [The Historic Environment and Site Allocations in Local Plans](#) provides a 5-step methodology for site assessment
- Historic England's Advice Note 4 [Tall Buildings: Historic England Advice Note 4](#)
- Historic England's Advice Note 7 [Local Heritage Listing](#)
- Historic England Advice Note 18 on [Adapting Historic Buildings for Energy and Carbon Efficiency](#)
- Historic Environment [Good Practice Advice in Planning: 3 The Setting of Heritage Assets](#)
- Historic England's Advice Note 8 [Sustainability Appraisal and Strategic Environment Assessment](#)

Question 19 - Should:

- the scope of any of the proposed evidence studies be changed?
- any other evidence be updated or commissioned to prepare the GNLP 2045?
 - o See <https://gnlp.oc2.uk/document/94/35208#topofdoc> for proposed evidence studies and their scopes

There is a range of other evidence that you will need to support your plan. Some of this is already available while you will need to commission other new work as part of your proportionate evidence base.

- National Heritage List for England [NHLE](#) with data available via the Historic England [Open Data Hub](#)
- Historic Environment Record
- National and Local [Heritage at Risk](#) Registers
- Heritage Impact Assessments for potential site allocations
- Landscape Character Assessment Historic Landscape Characterisation
- Renewable Energy Study
- Conservation Area Appraisal and Management Plans – update where needed
- Local List (NDHA) – criteria and list

Table 1 sets out your current proposed evidence. We make the following comments:

New Settlements Study – this should include consideration of the historic environment (designated and non-designated heritage assets as well as historic landscape characterisation and landscape character assessment)

Housing Capacity Study – will this include consideration of capacity in light of heritage?

SEA – we look forward to the opportunity to comment at Scoping

Densification and Brownfield opportunities plus Townscapes Study – this will need to give careful consideration of the historic environment including historic grain, key heritage views, character of Conservation Areas, impacts on heritage assets. See Historic England's Advice Note 4 [Tall Buildings: Historic England Advice Note 4](#) We would wish to be consulted on this evidence-based document.

Landscapes Study – This should include both Landscape Character Assessment and Historic Landscape Characterisation

Heritage Assessments and Design Codes We welcome the intention to include the South Norfolk and Broadland Design Code, and to consider a Design Codes for Norwich. We also

welcome the intention to prepare Heritage Impact assessments to support site selection and policy wording of specific site allocations.

Historic England notes that Greater Norwich has previously prepared a number of heritage assessments to support preparation of the former Local Plan. However, this evidence was prepared quite late in the Plan preparation process and did not fully meet the 5-step site selection HIA methodology set out in our advice note [The Historic Environment and Site Allocations in Local Plans](#).

For this new Plan, we strongly recommend that **Heritage Impact Assessments (HIAs)** should be prepared for any new strategic growth options or site allocations where designated heritage assets could be affected, recognising that harm can arise through development affecting their settings much earlier in the plan preparation to both inform site selection and also to inform the mitigation and enhancement opportunities and consequent policy wording for the Local Plan.

Norfolk and Suffolk Energy Action Plan Will this also explore the opportunities for renewable energy? This should be informed by proportionate evidence on the historic environment.

Question 20 - Do you consider that our proposed approach to engagement at the statutory consultation stages correctly identifies:

- the purpose of each stage of engagement?
- The target audience(s) at each stage?
- Appropriate engagement methods throughout?
 - o See [Greater Norwich Local Plan - GNLP 2045 Regulation 20 Scoping Consultation](#) for engagement strategies at Reg-20, Reg-23, and Reg-27 stages

Please explain your answers.

Question 21 - Are there any additional methods of engagement you would like to see included in our engagement strategy – particularly where these would help us to support hard to reach groups?

We would be grateful if you could add our general casework email address eastplanningpolicy@HistoricEngland.org.uk to the consultation database. This should be used for all planning policy consultations.

To assist our assessment of the plan's potential heritage impacts, we would be grateful if you could provide the GIS shapefiles for all proposed site allocations and site-specific designations (e.g., protected views, renewable energy zones, and tall building areas) alongside the public consultation documents.

Additionally, please identify any specific allocations that you believe would particularly benefit from direct advice from Historic England. Potential policies that interact with the historic environment or character of places.

Whilst recognising your Digital First approach to engagement, there may be occasions when we require a PDF of your consultation documentation to enable us to keep a record of the consultation material.

In addition, we may need to submit our comments as a letter/table to provide an overarching narrative of our comments/themes, to comment on things that are missing from the Plan or to comment on evidence/or lack of.

Future Engagement

Historic England is not a plan-making body, but we would be pleased to cooperate with the Council and to prepare a Statement of Common Ground in due course.

Question 22 Is there anything else you think is missing from this consultation or you would like to comment on in relation to the GNLP 2045?

We understand from other authorities in the Norfolk area that there is a proposed consistent methodology for assessing sites developed by the Norfolk Strategic Planning Framework. We welcome this joined up and co-ordinated approach across the County. We would however welcome the opportunity to comment on the methodology before it is used to assess the sites. Please send this through for comment.

It is important that the site selection methodology gives proportionate and appropriate consideration of the historic environment. We refer you back to our advice letter dated 3rd March 2026 regarding site selection methodology including heritage impact assessment.

Concluding comments

In preparation of the forthcoming local plan, we encourage you to draw on the knowledge of local authority conservation officers and archaeologists as well as local heritage groups.

Please be particularly mindful of potential changes to requirements for development management policies with the new NPPF and ensure that your Plan scope aligns with the most up to date policy framework.

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.

Thanks again for consulting Historic England on the review of your Local Plan. If you have any questions or would like to discuss anything further, please do not hesitate to contact me.

I would be grateful if you would confirm receipt of this letter.



Yours sincerely

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