



Examination of Greater Norwich Local Plan

Matter 3, Issue 1 and 6

Strategy for the Areas of Growth

Historic England, Hearing Statement

January 2022

Historic England is the principal Government adviser on the historic environment, advising it on planning and listed building consent applications, appeals and other matters generally affecting the historic environment. Historic England is consulted on Local Development Plans under the provisions of the duty to co-operate and provides advice to ensure that legislation and national policy in the National Planning Policy Framework are thereby reflected in local planning policy and practice.

The tests of soundness require that Local Development Plans should be positively prepared, justified, effective and consistent with national policy. Historic England's representations on the Publication Draft Local Plan are made in the context of the requirements of the National Planning Policy Framework ("the Framework") in relation to the historic environment as a component of sustainable development.

Historic England Hearing Statement

Introduction

- 1.1 This statement addresses the Inspector's questions with regards Matter 3 of the Local Plan.
- 1.2 This hearing statement should be read alongside Historic England's comments submitted at previous consultation stages of the Local Plan.

Matters and Issues for Greater Norwich Local Plan

Matter 3 Strategy for the Areas of Growth

Issue 1 The Norwich Urban Area including the fringe parishes

A number of sites referred to in this policy including East Norwich Strategic Regeneration Area and Anglia Square will be the subject of separate sessions within the hearing programme.

1. Is the approach set out in Policy 7.1 to focus development in the city centre, in strategic regeneration areas in East Norwich, the Northern City Centre and at strategic urban extensions and urban locations justified by the evidence and consistent with the overall vision, objectives and spatial strategy of the Plan? Is this strategy deliverable?

- 2.1 It is Historic England's view that there is **insufficient historic environment evidence to support some of the sites** which contribute to the Strategy for the Areas of Growth. This therefore **calls into question the capacity** of some sites which in turn **raises important questions about the overall deliverability of the strategy** as a whole.
- 2.2 In particular we have concerns about two major sites; **East Norwich and Anglia Square** sites. Together these sites comprise a total of **4800 dwellings**.
- 2.3 We continue to raise concerns that in our view the GNLP heritage statements for Anglia Square and East Norwich do not really constitute sufficient heritage assessment or Heritage Impact Assessments (HIA). For East Norwich the GNLP heritage statement advises that the masterplanning exercise will consider heritage. Furthermore, the more recent Cotswold Archaeology Built Heritage Appraisal for East Norwich, part of the masterplanning exercise, does not really include a sufficient degree of assessment for an HIA.
- 2.4 For Anglia Square the GNLP heritage statement is largely a list of heritage assets, rather than an actual assessment and set of recommendations.
- 2.5 Such HIA evidence is important to inform the Plan allocations – both in terms of site **capacity** (including matters of density and height) and also policy requirements in the Plan (e.g. potential mitigation/enhancement). Without such information the allocations are not sufficiently justified as they are not based on sufficient evidence.
- 2.6 The fact remains that we recommended that HIAs be prepared as part of the evidence base for the Plan in line with guidance on site allocation

assessment set out in Historic England's advice notes on Local Plans (GPA1) and Site Allocations (HEAN3) in both our Regulation 18 and Regulation 19 responses, as well as at a number of meetings/in correspondence.

- 2.7 It is our view that a heritage impact assessment should be an important part of a **proportionate evidence base**, especially for large strategic sites and/or where there are particular heritage issues.
- 2.8 Heritage Impact Assessments should be prepared prior to allocating sites which are likely to affect heritage assets to test the suitability of these sites in terms of the potential impact on the historic environment.
- 2.9 It is important to establish the suitability of the site per se prior to allocation because once a site has been allocated in an adopted Local Plan the principle of development has been established. If the sites are suitable, the measures to avoid harm, or mitigate where harm cannot be avoided, should be incorporated into the site application and its policy. These could include the extent of the allocation, capacity and/or varying densities across the site, location of buffers etc. As such we recommend inclusion of a concept diagram.
- 2.10 In light of this, we question the capacity of both of these sites.
- 2.11 In particular, in the case of East Norwich, the councils own recent masterplanning exercise is already concluding that 4000 dwellings is not achievable on the site. They suggest a figure of 3469. In our view, even this figure is likely to be too high and has potential to harm the historic environment.
- 2.12 And we have raised concerns in our representations in relation to Anglia Square regarding the proposed capacity of the site (at 800 dwellings). We have suggested a lower figure closer to 600 dwellings might be more appropriate.
- 2.13 But in both cases, in the absence of HIAs it is hard to draw firm conclusions in relation to capacity.
- 2.14 Given that in our view two of the large sites are **not sufficiently justified by historic environment evidence**, giving rise to **uncertainties in relation to capacity** for both these large sites, it is our view that this **raises important questions about the deliverability of the strategy** as a whole.
- 2.15 We will leave further detail in relation to these specific sites for the separate hearings.

6. Do the site-specific requirements in Policy 7.1 relating to the East Norwich Strategic Regeneration Area duplicate those set out in Policy GNLP0360/3053/R10?

- 2.16 Yes, in comparing the site-specific requirements for East Norwich listed in Policy 7.1 and Policy GNLP/0360/3052/R10, there is a considerable degree of overlap and duplication between the two policies.
- 2.17 For example, in Policy 7.1, the second bullet point on page 106 of the Draft Strategy refers to *an inclusive, resilient and safe community...*, which is repeated in Policy GNLP0360/0353/R10 criterion 2 on page 16 of the Sites Plan.
- 2.18 Then in Policy 7.1, the first bullet point on page 106 of the Draft Strategy refers to *an exemplar design approach* but in Policy GNLP0360/0353/R10 the 5th bullet point on page 17 of the sites plan talks of *an exemplar high quality, locally distinctive design* – so the wording here is similar but slightly different.
- 2.19 These are just two of many such examples in the policies.
- 2.20 Whilst the site requirements in both policies are broadly good, it is perhaps a little confusing to have two separate, fairly detailed lists that are similar but not exactly the same. This could in turn lead to a degree of uncertainty about the requirements for the site.
- 2.21 Paragraph 16d of the NPPF makes it clear that policies should be *clearly written and unambiguous, so it is evident how a decision maker should react to development proposals*.
- 2.22 Planning Practice Guidance, Paragraph: 002 Reference ID: 61-002-20190315, Revision date: 15 03 2019 states that: *Where sites are proposed for allocation, sufficient detail should be given to provide clarity to developers, local communities and other interested parties about the nature and scale of development. Where a local plan contains both strategic and non-strategic policies, the non-strategic policies should be clearly distinguished from the strategic policies*.
- 2.23 Given the duplication and slight variations in wording, the policies as currently worded **do not provide a clear, and unambiguous** policy framework to the decision maker, **nor do they provide clarity** to developers, local communities and other interested parties. Finally, the strategic policy 7.1 is **not clearly distinguished** in scope and content from the detailed site-specific

policy GNLP0360/0353/R10. Therefore, it is **not consistent with national policy**.

- 2.24 It is our view that policy 7.1 should be much shorter and focus on the broad strategic matters e.g. masterplan required, overall site capacity, broad vision for area, potential mix of uses etc. The detailed site-specific policy GNLP0360/0353/R10 should more appropriately contain the detailed site-specific requirements. This would avoid unnecessary duplication, potential for inconsistencies and thus the potential for confusion.