



Examination of Greater Norwich Local Plan

Matter 8, Issue 1

East Norwich Strategic Regeneration Area

Hearing Statement

January 2022

Introduction

- 1.1 This statement addresses the Inspector's questions for Matter 8.
- 1.2 It should be read alongside Historic England's comments submitted at previous consultation stages.

Matter 8 Strategic Growth Areas Allocations

Issue 1 East Norwich Strategic Regeneration Area

- 1. The report to the Cabinet of Norwich City Council on 16 November 2021 indicates that the expected number of homes on the site should be reduced to 3469. Is the capacity of 4000 homes for the East Norwich Strategic Regeneration Area realistic and justified by the evidence?***

Capacity of site unsound

- 2.1 Historic England consider that the capacity of 4000 homes for the East Norwich SRA is neither realistic, justified by the evidence nor consistent with national policy and the allocation is therefore **unsound**.
- 2.2 Whilst recognising that this brownfield site in a sustainable location has great potential for strategic regeneration to help meet the growth needs of Norwich, Historic England has raised concerns regarding the capacity of the East Norwich site over several years.

A site rich in heritage assets

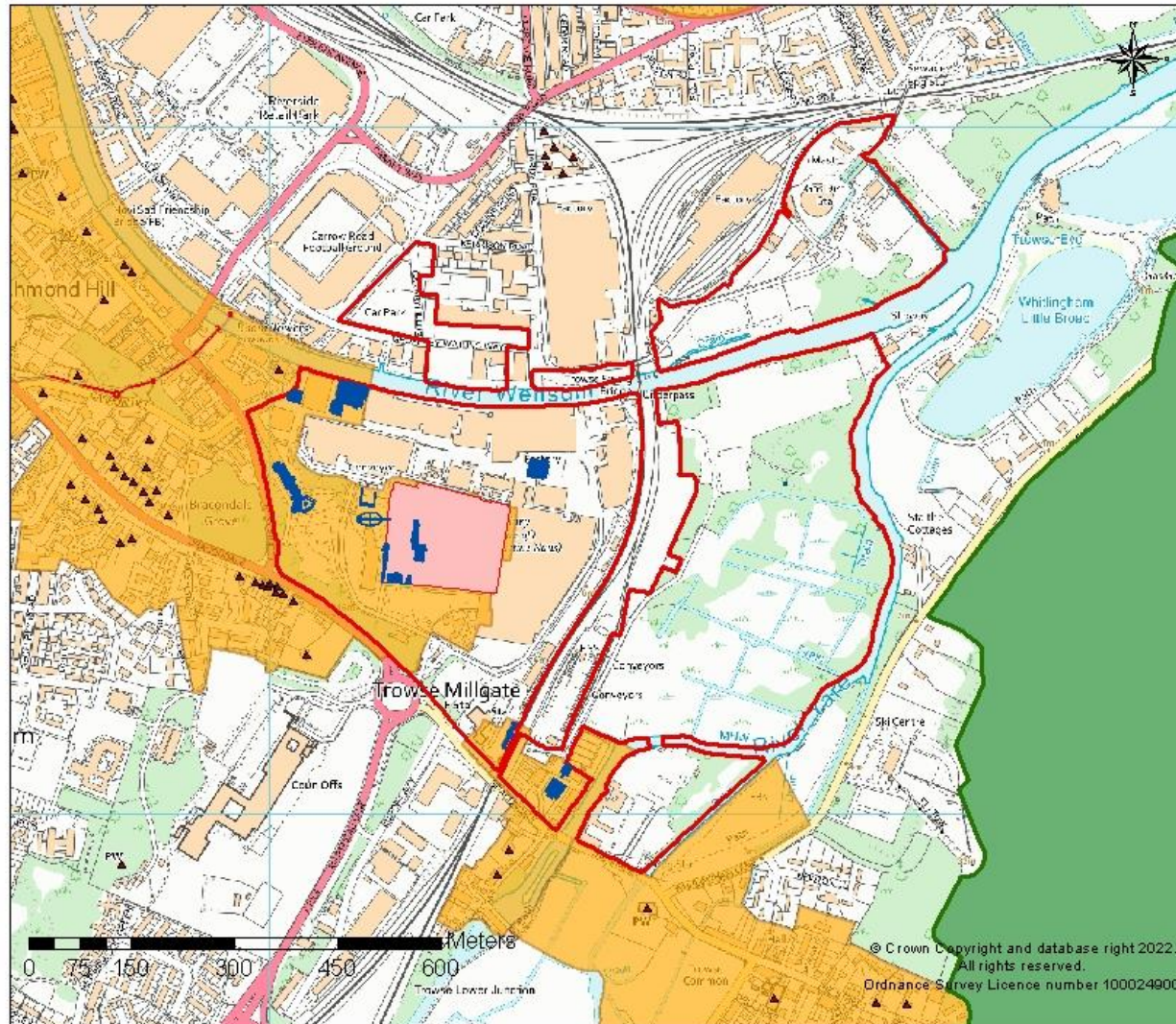
- 2.3 The site and surrounding area has a rich heritage including a number of highly graded designated heritage assets.
- 2.4 Carrow Works is a fascinating site with a rich history encompassing the medieval monastic period through to the nineteenth and twentieth century industrial works of the Colman's factory with its strong identity with the city and the associated domestic buildings and landscape. The site lies within the Bracondale Conservation Area. It includes the Scheduled Monument, Carrow Priory and grade I listed Carrow Abbey, grade II* Conservatory to Carrow House as well as several grade II listed buildings. The former factory was developed along the bank of the River Wensum, leaving Carrow Abbey with a separate garden setting which it shared with Carrow House. There are also a number of grade II buildings nearby on the opposite side of Bracondale.
- 2.5 The Deal Ground includes a grade II listed bottle kiln and part of the site lies within the Trowse Millgate Conservation Area. The Grade II Registered Park and Garden, Crown Point, lies to the east and contains the grade II* Whitlingham Hospital and several grade II listed buildings, while the grade I listed St Andrews church, Trowse, is close to the south western corner. The Deal Ground includes land which was historically the flood plain of the River Yare and has remained undeveloped, making it a positive element in the setting of several heritage assets.

- 2.6 Historic England's Listing team recently reviewed many buildings on the site. Several assets were listed and amendments made to existing listings/scheduling.
- 2.7 Development has the potential to affect these heritage assets and their settings.

The table summarises the designated heritage assets on site. These are shown on the subsequent illustrative maps.

No.	List Entry Number	Name of Asset	Grade/ Scheduled	Amended /New
1	1205742	Carrow Abbey	I	Amended
2	1116888	Carrow Works Block 92, King Street,	II	Amended
3	1372826	Carrow Works blocks 7, 7A, 8A and 8 including metal canopy attached to block 7, Carrow Works	II	Amended
4	1004031	Carrow Priory (ruined portions), Carrow Works,	Scheduled	Amended
5	1292106	Carrow House, King Street,	II	Amended
6	1479038	Carrow House Conservatory	II*	Added
7	1478214	Eastern air raid shelter at Carrow Works	II	New
8	1478346	Trowse Railway Station	II	New
9	1478166	Flint wall and 19 attached pet tombs, Approximately 40m west of Carrow Abbey,	II	New
10	1478591	Lodge, gardener's cottage and former cart shed to Carrow Abbey	II	New
11	1478657	K6 Telephone Kiosk outside the entrance of the former mustard seed drying shed, Carrow Works,	II	New
12	1478122	Former Mustard Seed Drying Shed, Carrow Works,	II	New
13	1268401	Timber-drying bottle kiln at NGR TG2475007481	II	Amended
14	1478318	Walls steps and paved surfaces of the sunken garden near Carrow Abbey, approximately 33m west of Carrow Abbey,	II	New
15	1478264	Late C19 engine house at Trowse Sewage Pumping Station, Trowse Pumping Station,	II	New
16	1478662	Early C20 engine house, boiler house and coal store at Trowse Sewage Pumping Station	II	New
		Bracondale Conservation Area		
		Trowse Millgate Conservation Area		

Designated Heritage Assets in and around the East Norwich Strategic Regeneration Area



Legend

- ▲ Listed Buildings outside Regeneration Area
- Scheduled Monuments
- Listed Buildings within Regeneration Area
- Crown Point Registered PAG
- Strategic Regeneration Area
- Conservation Areas

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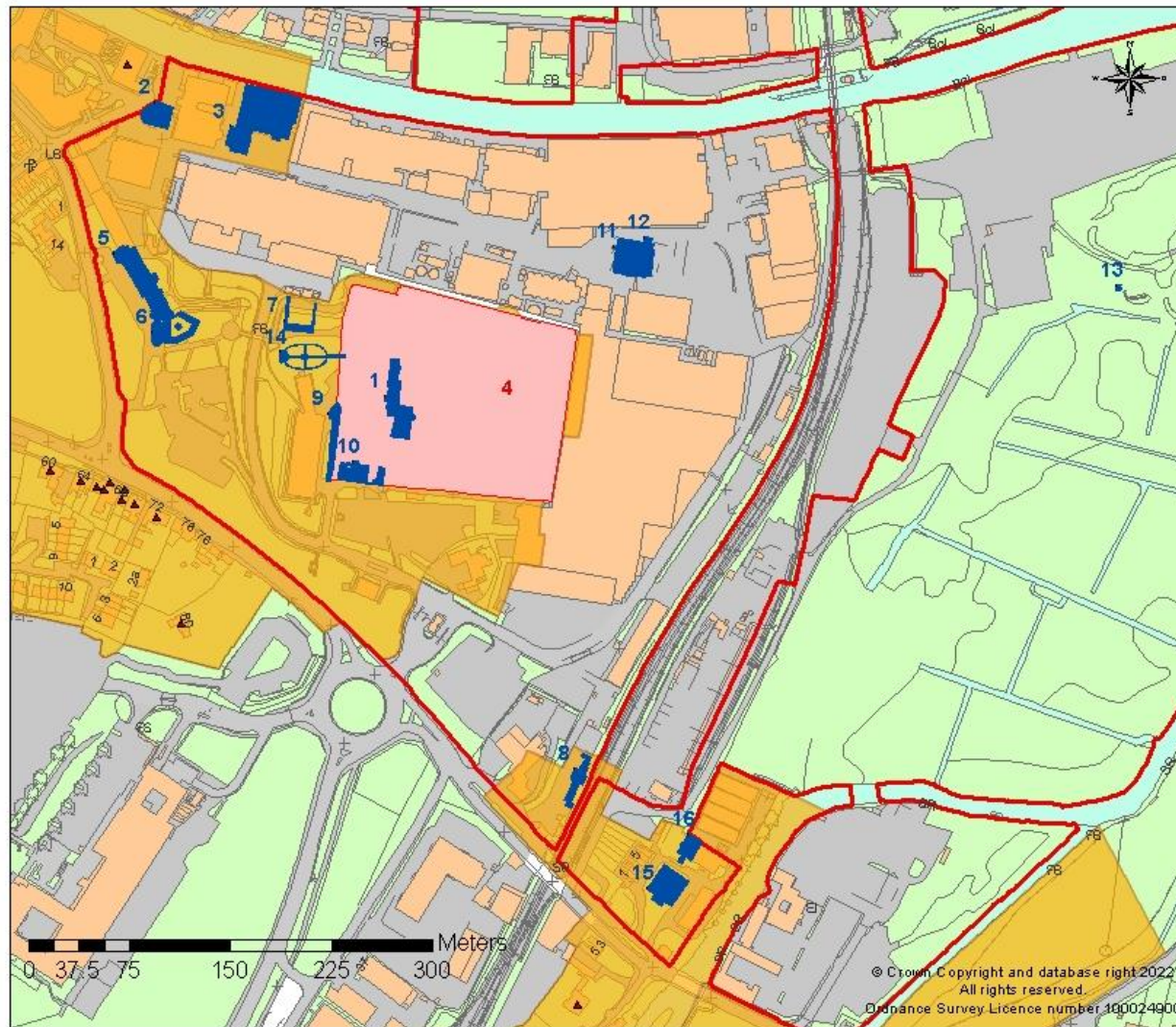
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Designated Heritage Assets within the East Norwich Strategic Regeneration Area numbered (see table)



Legend

- ▲ Listed Buildings outside Regeneration Area
- Scheduled Monuments
- Listed Buildings within Regeneration Area
- Strategic Regeneration Area
- Conservation Areas

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The need for a Heritage Impact Assessment to inform the site allocation including potential capacity

- 2.8 To properly inform the capacity of the site (and the policy for the allocation) Historic England has advocated the preparation of a **Heritage Impact Assessment (HIA)**, in line with the advice given in the Historic England Advice Note on Site Allocations [HEAN3](#)
- 2.9 Our Growth Options response in March 2018 highlighted the importance of assessing potential sites using the 5 step HIA methodology set out in HEAN 3. We reiterated this advice in subsequent Local Plan consultations, and specifically in relation to this East Norwich site at Regulation 18 (March 2020) and Regulation 19 (March 2021).
- 2.10 Of all the sites in the draft GNLP, given the concentration of designated heritage assets, particularly on site but also nearby, this is perhaps the most important site in the Plan for the preparation of an HIA.

Insufficient heritage evidence to justify site allocation; the evidence that does exist points to reduced capacity

- 2.11 In June 2021 the Councils issued a series of Heritage Statements, including one for East Norwich [East Norwich Heritage Statement](#). However, this is not an HIA but simply sets out the Councils intention to prepare a site masterplan.
- 2.12 The preparation of a site masterplan is ongoing. Whilst the masterplan work draws on a Built Heritage Appraisal and Archaeological Desk-Based Assessment by Cotswold Archaeology, 2021, and is a step in the right direction, these documents do not constitute an HIA as recommended in HEAN 3.
- 2.13 As highlighted in our [SOCG HE and GNLP](#), the Built Heritage Appraisal is more of a baseline assessment and mainly focusses on listing the various heritage assets on site and their significance. We advised that this initial assessment should ideally be expanded to assess the likely impact of development on significance of heritage assets, include some broad recommendations on key heritage issues that will need to be addressed in the Local Plan policy (including potential mitigation and enhancement measures). This should inform both the policy and then the masterplan. To our knowledge, this additional work has not been completed.
- 2.14 However, the initial draft Masterplan Stage 1 [Part 1](#) and [Part 2](#) November 2021 itself concludes that the capacity of the site is 3,469 dwellings, significantly short of the 4000 homes allocation.

2.15 Moreover, Historic England has concerns about some of the specific proposals for development being brought forward in the East Norwich draft masterplan.

- At the core of the Carrow Abbey site the ruins of the mediaeval Priory, the grade I listed Abbey House and buildings associated with them form a distinct group. The master plan proposes the erection of multiple residential buildings to the south of the Abbey's garden which would form an area of new development wrapping around Stable Cottages and stretching from it to The Lodge. This development would separate the Abbey from its historic stables (Stable Cottages) and the Lodge from the historic approach to it and the Abbey as well as build on part of the historic gardens. This would result in harm to the significance of the Abbey, Priory, Lodge and Stable Cottages.
- Since the development of the factory in the 19th century the gardens to Abbey house have been bordered by trees on their east and north sides which has provided a sense of separation between the garden and factory. The plan proposes buildings of up to six storeys in height adjacent to the northern edge of the garden as well as taller buildings on the waterfront beyond and buildings of four or five storeys to the east, possibly with designed gaps in the planting belt allowing views from these properties towards the Abbey. We consider it important that this development should not visually impinge on the gardens by being visible above or through the perimeter planting and that harm to the significance of the scheduled monument and the grade I listed house could result from this. In line with policy we would seek enhancements to the significance of the Abbey through improvements to its setting.
- The area between Carrow Abbey and Carrow House was historically small-scale parkland. It has been affected by a modern access road and factory building but predominantly remains green space and includes a grade II listed sunken garden and historic boundary wall to the Abbey. The plan proposes some small-scale housing units to replace the factory building, but more substantial building is shown close to the grade II* listed conservatory to Carrow House and gardens associated with it. We are concerned that harm to the conservatory and Carrow House could result from this and potentially from the 7-storey building proposed to the north east of the House. Again, we would look for enhancements to the significance of the Abbey and House in this area.
- The masterplan suggests buildings on the riverfront part of the Carrow Abbey site and on the Waterside North site might be 10 or 11 storeys in

height. The effect of this on views from Crown Point Registered Park and Garden and how it might change the experience of the historic city and its rural edge is unclear but has the potential for harmful impact on these heritage assets. This might also impact upon the Abbey site itself.

- The western part of the masterplan area called The Villages includes part of the valley of the River Yare opposite Crown Point and Trowse village conservation area. The visual impact of proposed buildings up to 4 or 5 storeys in height needs to be established, but the effect of developing the south west corner of The Villages area of the masterplan area (referred to as the May Gurney site) is clearer. This is close to the grade I listed parish Church of St Andrew, which historically stood in open land between Trowse Millgate and Trowse Newton surrounded by water courses. The May Gurney site is presently largely used for surface car parking, but the proposed plan would extend development across the whole site and bring buildings closer to the church with potential harm to its significance. Restricting development to the presently built-on part of this site while reverting the western half to form part of the County Wildlife Site proposed for the rest of The Villages would reduce impact on the church and actively enhance its setting.

- 2.16 The concerns above relate to the scale and extent of new building proposed across the masterplan site area. This leads to concerns that the proposed number of residential units for the site is in excess of what can be accommodated without harm to designated heritage assets.

Conclusion

- 2.17 Ultimately the capacity of the site should be informed by an appropriate evidence base, including an HIA as advised by Historic England in HEAN 3.
- 2.18 Instead, the Council appears to be retrospectively justifying its allocation through the preparation of masterplan evidence very late in the Plan preparation process. And even the initial findings of their own evidence shows that there is insufficient capacity for 4000 dwellings, placing the figure at 3469.
- 2.19 And on the basis of the draft masterplan, it is Historic England's view that 3469 homes illustrated in the masterplan, would harm the historic environment. Therefore, in our view, the capacity of the site should be much lower than even 3469 and should be properly informed through HIA.
- 2.20 To conclude, it is Historic England's view that the capacity of 4000 homes is **not sufficiently justified**. The Councils own masterplan evidence concludes a capacity of 3469. And in our view, having carefully considered that masterplan, this would still cause a degree of harm to the historic

environment. Therefore, it is **not consistent with national policy** which states that heritage assets should be conserved in a manner appropriate to their significance (NPPF paragraph 189). To that end, and taking into account the tests of soundness set out in paragraph 35 of the NPPF (2021), we find the allocation **unsound**.

4b. To what extent do the sites constraints such flood risk, contamination, heritage, adjoining uses, and landscape features impact upon the deliverability of the site over the plan period and the total likely yield?

- 2.20 All these constraints have an impact on the deliverability and the total likely site yield. Given our remit, the focus of our response will be the historic environment.
- 2.21 Paragraphs 2.3 – 2.7 of our statement illustrate the wealth of heritage across the site. Not only are there a number of designated heritage assets, most notably the scheduled Carrow Priory and grade I listed Carrow Abbey within the site, but also a whole range of other heritage. There are also many nearby heritage assets – conservation areas, listed buildings and Crown Point Registered Park and Garden, together with the wider cityscape and skyline - which could potentially be affected by development of this scale.
- 2.22 Archaeology mitigation will likely be a significant factor, adding time and cost to the delivery of any scheme. This therefore will have an impact on site deliverability.
- 2.23 The range of heritage interest on and around the site will inevitably also affect yield. The matter of site capacity has been explored in detail under issue 1 and so will not be repeated here, but suffice to say, it is our view that the site cannot deliver 4000 homes, or even the 3,469 homes now suggested in the draft masterplan, without causing harm to the historic environment.

8. Does the Policy effectively ensure the protection and enhancement of heritage and other assets on or close to the site?

Policy, Guidance and Advice in relation to scope of policy wording

- 2.24 It is important that policies include sufficient information regarding criteria for development. Paragraph 16d of the **NPPF** states that policies should provide ‘a clear indication of how a decision maker should react to a development proposal’.
- 2.25 **Planning Practice Guidance** Paragraph: 002 Reference ID: 61-002-20190315Revision date: 15 03 2019 also makes it clear 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.'

- 2.26 **Historic England's Advice Note on Site Allocations** [HEAN3](#) includes a section on site allocation policies at paragraphs 3.1 – 3.2. It states, '*The level of detail required in a site allocation policy will depend on aspects such as the nature of the development proposed and the size and complexity of the site. However, it ought to be detailed enough to provide information on what is expected, where it will happen on the site and when development will come forward including phasing. Mitigation and enhancement measures identified as part of the site selection process and evidence gathering are best set out within the policy to ensure that these are implemented.*'

Some heritage criteria provided in policy

- 2.27 Policy GNLP0360/3053/R10 and supporting text include a number of references to the historic environment which is welcomed.
- 2.28 Criteria 5, 6, 8 and 12 of the policy for the strategic allocation all include historic environment components. Criterion 3 of the Deal Ground section of the policy, Criteria 2 and 3 of Carrow Works, and criterion 1 of the Utilities site all refer to the historic environment.
- 2.29 In addition, in policy 7.1, bullet 6 of the East Norwich section also includes reference to the historic environment which is welcomed.
- 2.30 All of these criteria provide some level of protection to heritage assets on and near the site. But is this enough and is it effective?

Capacity issue not properly addressed – implications for historic environment

- 2.31 One of the biggest factors affecting the effectiveness of the policy in protecting and enhancing the historic environment is the site capacity, including densities and building heights of the sites. For the reasons outlined above, we have concerns regarding the capacity of the site indicated in the Plan and consider that the current proposals are likely to have a detrimental impact on the historic environment.
- 2.32 Whilst this issue is beginning to be explored through the preparation of a masterplan, the capacity of the site indicated in the allocation is already being shown to be unachievable through the Council's own masterplanning work. And early indications are that the draft masterplan, showing just 3469 homes is still, in our view, likely to cause harm to the historic environment.

- 2.33 It is our view that issues such impact on significance of heritage assets, capacity, height, density etc should more properly be explored through HIA in advance of allocation to inform site capacity, mitigation measures and policy wording.

Potential mitigation and enhancements not included in policy

- 2.33 The policy should also more clearly indicate any potential heritage mitigation and possible enhancements needed. This should be informed and evidenced by an HIA. In the absence of this evidence, it is difficult to draft policy wording that effectively ensures the protection and enhancement of the historic environment.

Conclusion

- 2.34 Therefore, it is our view that the policy criteria, whilst making some reference to the historic environment, should be more detailed, specific and, in particular, informed by an HIA which would provide specific recommendations for mitigation and enhancement opportunities that could then be incorporated into policy wording. This would make the policy more effective in protecting and enhancing the historic environment.
- 2.35 The fact that no HIA has been undertaken and that the masterplan work is on-going means that the policy criteria have not been informed by appropriate evidence and are less likely to be either sufficient, justified or effective.
- 2.36 The 4000-home site capacity indicated in the allocation is already being shown to be unachievable through the Council's masterplanning work. And even the draft masterplan showing just 3469 homes is still, in our view, likely to cause harm to the historic environment.