



Examination of Greater Norwich Local Plan
Matter 8, Issue 1
East Norwich Strategic Regeneration Area
Hearing Statement
June 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 and during the previous hearings.

Matter 8 Strategic Growth Areas Allocations

Issue 1 East Norwich Strategic Regeneration Area

1 The work undertaken for the Stage 2 illustrative masterplan indicates that the capacity of the site should be reduced to 3,362 from the 4,000 identified in the submitted plan. Is this capacity justified by the evidence and does it adequately reflect the site constraints?

2.1 Historic England's hearing statement in January 2022 set out our concerns in relation to capacity and site constraints.

2.2 We welcome the reduction in site capacity from 4,000 to 3,362. We welcome some of the changes made to the masterplan to address some of our concerns in relation to impacts on heritage. However, in summary, we do not consider that these changes go far enough. There needs to be more open space and set back around some of the key heritage assets in order to avoid harm to their significance, in particular removing proposed development from land to the south of Carrow Abbey. This could, in turn, affect the overall capacity of the site.

Continued lack of Heritage Impact Assessment

2.3 A full heritage impact assessment has still not been prepared for the site. In a letter to GNLP in Autumn 2021 we had made some suggestions for additional work in relation to heritage to complete the Heritage Baseline Study. As far as we are aware, this work has not been done. There is still no assessment of impact and no recommendations for mitigation/enhancement to inform policy wording.

Desk Based Archaeological Assessment

2.4 In March we received the Desk Based Assessment for the site. It is a thorough and appropriate assessment of the site's archaeological potential within the constraints of the sources available at the time of its production (June 2021). However, a number of sources of information (e.g. Norfolk air photo library, Norfolk Records Office) were not available at that time due to Covid restrictions. These sources can now be accessed, and it would be desirable that they are consulted, and the findings added as an addendum to the DBA so that the assessment is as comprehensive as possible.

- 2.5 We do however appreciate that the Council has sought to assess capacity in a different way through the development of a draft masterplan and SPD.

Changes to the Masterplan

- 2.6 We appreciate that some of changes have been made to the draft masterplan following our comments in January 2022. The changes include moving the building line south from Carrow House, changes to the south of the abbey and the removal of some development on the Bracondale street frontage. We also note that further consideration has been given to building heights and mass including incorporating maps of site sensitivities and also heights in the SPD.
- 2.7 However, in our view, these changes do not go far enough. We have been asked to provide detailed comments on the SPD to the Council and we will provide those comments separately. However, our key areas of concern regarded the masterplan/SPD, in so far as it relates to the Local Plan, are set out below.
- 2.8 Appendix 1, the East Norwich Strategic Regeneration Area, Stages 1 and 2 Bridging Document (dated May 2022) includes some amendments to the Masterplan. Specific parts of the Masterplan area are identified on page 5, Section 4, (Overview of Masterplan Amendments Required) and the following pages.
- 2.9 On page 9, relating to **Area 5** (the setting of Carrow House) it is positive to see development moved away from the grade II* listed conservatory but the presence of building in this area still projects eastward into the park impinging on the relationship between Carrow House and Abbey.
- 2.10 As regards **Area 6** (the setting of Carrow Abbey, page 9) there has been little apparent reduction in proposed development, and just some minor reconfiguring of layout in this area. The previous comments in the masterplan about the effect of surface car parking on the setting of heritage assets is simply repeated, again without justification from a heritage assessment which actually considers the impact of the proposed site use. It is our view however that the car park, although not ideal, is at least open. This openness is important to setting and should be further enhanced by appropriate landscaping, rather than built development.
- 2.11 There is some reduction in the amount of development in the setting of Saint Andrews church, (**Area 7**, page 11) allowing more open space at the corner of the site closest to the church. This is a positive development.

- 2.12 **Area 8** (the housing east of Carrow Abbey) has not been identified as raising any issues regarding heritage even though we have clearly commented about the sensitive relationship between this development and Carrow Abbey and there is no response to this in the comments on page 13 .
- 2.13 In appendix 2, the Stage 2 Masterplan Summary of May 2022, figure 14 on page 28 refers to the heights of buildings. However, these are only broadly defined in areas with ranges of storey heights given. It is not entirely clear but, it does appear that in certain areas the heights have actually increased. These broad ranges are in fact less helpful in determining the impact of development on heritage assets than the previous version where specific heights were given. This includes areas along the river where the scale of development has the potential to harm a range of heritage assets are where reduction in height of development may therefore be needed. In the absence of appropriate assessment of height, it is difficult to determine the extent to which this would be harmful to heritage.

What further changes would we like to see to the masterplan/SPD?

- 2.14 We continue to recommend that there should be no built development in **Area 6**. This area of land should be kept open, ideally with the setting of the Abbey being enhanced by breaking out the concrete car park area and returning the land to green space through careful landscaping. This is an important part of the setting of the Abbey as it is the main approach to the Abbey and enables the collection of buildings including the stables and lodge to be read as part of the Abbey complex.

Reduced Site Capacity

- 2.15 It therefore remains our view that **the capacity of the site needs to be further reduced** to enable the provision of sufficient buffers/heritage mitigation around highly graded heritage assets and suitable heights across the site.

4. Does Policy GNLP0360/3053/R10, including the suggested modifications proposed by the Partnership, provide an effective framework for the delivery of the East Norwich Strategic Regeneration Area?

- 2.16 Our response will focus on the historic environment aspects of the policy. In determining whether the policy provides an effective framework for the delivery of the ENSRA, it is important to consider policy guidance and advice on policy wording, before considering the degree to which the policy meets these standards.

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

- 2.17 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’*.
- 2.18 **Planning Practice Guidance** Paragraph: 002 Reference ID: 61-002-20190315 Revision 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.’*
- 2.19 **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.’*
- 2.20 Having considered the policy, advice and guidance in relation to site allocation policy wording, to what extent does the revised policy provide an effective framework for delivery of development at East Norwich?

Some heritage criteria provided in policy

- 2.21 Policy GNLP0360/3053/R10 and supporting text does include a number of references to the historic environment which is welcomed.

Welcome improvements to policy wording

- 2.22 We welcome some of the changes that have been made to policy 7.1 and Policy GNLP0360/0353/R10.
- 2.23 **Policy 7.1** In particular, we welcome the simplification of policy 7.1 and removal of some of the more detailed aspects of that policy to create a more strategic, overarching policy. This also removes the risk of duplication or the possibility of the policies being inconsistent with slightly different wording covering the same things.

- 2.24 Policy 7.1 has reduced the proposed capacity of the site in line with the masterplan which is also welcomed. However, we still have some concerns regarding the capacity of the site, particularly in light of the comments made above in relation to the masterplan especially our concern regarding any development around the stables area and also our concerns in relation to heights. **We consider that this capacity may need to be further reduced.**
- 2.25 **Policy GNL0360/0353/R10** We welcome criterion 6 in relation to locally distinctive design of a scale and form which respects its context and setting.
- 2.26 We also welcome criterion 19 in relation to the conservation and long-term management of the bottle kiln.
- 2.27 In addition, we welcome criterion 22 in relation to a strategy of heritage interpretation for the Carrow works site. The important legacy of the Colman family needs to be both celebrated and reflected in the future development of the site.
- 2.28 Finally we welcome 24 in relation to the Utilities site and heritage significance.

Remaining issues with policy wording

- 2.29 However, a number of issues remain:
- a) Form of policy wording in relation to different heritage assets**
- 2.30 We note that the phrase, '**conserve and where opportunities arise enhance heritage assets**' is used throughout the policy and supporting text.' We would normally recommend this form of words specifically in relation to Conservation Areas. This is based on the wording in Part 2, paragraph 69 (a) of the Planning (Listed Buildings and Conservation Areas) Act 1990 and paragraph 206 of the NPPF.
- 2.31 However, where a combination of heritage assets is being referred to, we would recommend the following phrase, '**Development should conserve/sustain or where appropriate enhance the significance of heritage assets (noting that significance may be harmed by development within the setting of an asset)**'. This is based on the wording in the NPPF and Planning Practice Guidance Paragraph: 002 Reference ID: 18a-002-20190723 Revision date: 23 07 2019.
- 2.32 Ideally the policy and supporting text should be amended accordingly throughout the policy and supporting text. We have provided an example of the form of text in relation to criterion 7 below, but **this should also be**

applied throughout the rest of the policy and supporting text (e.g. para 4 of policy 7.1).

b) No Reference to Registered Park and Garden at Criterion 7

- 2.33 There is currently no reference in criterion 7 of the policy to the nearby Grade II Crown Point Registered Park and Garden (Whitlingham County Park). The policy should be amended accordingly.

c) No reference to specific heritage mitigation or enhancements in policy

- 2.34 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 evidence 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 Ideally an HIA should have been undertaken which would give recommendations for mitigation and enhancement that could then be used in the policy wording and to shape the masterplan.
- 2.36 In the absence of this, the masterplan is the next best thing and can be used to identify appropriate mitigation and enhancement measures for inclusion in the policy wording.
- 2.37 As currently drafted, with insufficient reference to mitigation and enhancement measures the policy is less likely to be either sufficient, justified or effective. The policy should be amended to include specific mitigation and enhancements.

d) Insufficient reference to requirements for Archaeological Investigation

- 2.38 We appreciate that archaeological assessment is referenced at criterion 13 of the policy. It would be helpful if this was located with the other heritage criteria and was more detailed.

Recommended changes to policy GNLP0360/0353/R10 wording

- 2.39 Therefore, in light of our comments above, we recommend a number of changes to the policy GNLP0360/0353/R10 to make it more effective and consistent with national policy.

a) Recommended changes to policy wording for Criterion 7

We suggest that criterion 7 of the policy is replaced with the following:

7 Development should conserve, or where appropriate enhance, the significance of designated and non-designated heritage assets both on-site and nearby (noting that significance may be harmed by development within the setting of an asset). Designated assets in and around the site include Carrow Abbey and St Andrews Church (both GI) Carrow House Conservatory (GII) and numerous GII listed buildings, Carrow Priory scheduled monument, Bracondale and Trowse Millgate Conservation Areas and Crown Point Registered Park and Garden (GII). Great weight should be given to the conservation of designated assets.*

Development should include a range of heritage mitigation and enhancement measures identified through the SPD and masterplan including (but not only):

- a) Repair and re-use of heritage assets; including provision for their long-term maintenance/management;*
- b) Protection of views from key views into and from the site including from Crown Points RGG across the City, St Andrews Church and the interconnection between the Abbey and Carrow House and from key heritage assets across the City;*
- c) Draw upon local character and distinctiveness;*
- d) Protect and enhance the Broads.*

b) Recommended changes to policy wording for Criterion 13 (ideally moved to be number 8 after other heritage matters)

13 Archaeological investigations are required in those areas of the site not previously subject to archaeological evaluation. These should be carried out prior to the determination of any planning application. The scope of any archaeological works should be agreed with Norfolk County Council (and Historic England where necessary in relation to the Scheduled Monument).

c) Recommended changes to policy wording for Deal Ground/May Gurney Section Additional new criterion for Deal Ground/May Gurney

Provision of open space to the north of St Andrews Church to provide an appropriate open setting with links to the wider landscape beyond;

d) Recommended changes to policy wording for Carrow Works section
To be added to criterion 21 for Carrow Works section

Development to the north and east of the Abbey Gardens should be of a height which would not visually impinge on the gardens. There should be no new built development south of the Abbey and around the Stables and Lodge buildings. There should be suitable landscaping to enhance the significance of the highly graded Carrow Abbey and reinstate the historic garden and approach to the Abbey;

SUMMARY

- 2.40 Whilst we welcome the reduction in the stated site capacity for East Norwich, we continue to have concerns about the capacity of the site. This is because we are concerned with the extent of development in some locations (especially south of the Abbey around the Lodge and Stables). We are also concerned about the heights of proposed development in some areas. Therefore, we consider that the capacity of the site may need to be further reduced to reduce harm to the historic environment.
- 2.41 Secondly, we consider that a number of changes to policy wording set out above would help to make the policy more effective and consistent with national policy.