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Direct Dial: 01223 582775

Our ref: PL00751046

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Dear Mr Harris

## **South Norfolk Village Clusters Housing Allocations Local Plan -Regulation 18 July 2021**

Thank you for consulting Historic England on the South Norfolk Village Clusters Housing Allocations Local Plan. As a statutory consultee, our role is to ensure that the conservation of the historic environment is fully integrated into planning policy and that any policy documents make provision for a positive strategy for the conservation and enjoyment of the historic environment.

Please also our detailed comments in the attached table. We provide a summary of the main comments below.

### **SUMMARY**

Whilst we consider many aspects of the plan to be sound we have identified issues with some of the policies and site allocations which do compromise the overall soundness of the plan.

Under paragraph 35 of the NPPF some aspects of this Plan are unsound as they have not been positively prepared, are not justified, effective, or consistent with national policy. We have identified below some of the key areas where we find the Plan **unsound** and what measures are needed to make the Plan sound. In summary we highlight the following issues

#### **a) Evidence Base for Potential Allocations**

There is a **lack of a detailed and proportionate historic environment evidence base** for some parts of the Plan. Paragraph 31 and 187 of the NPPF requires a proportionate evidence base for Plans.



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### **Importance of considering historic environment impact in site allocation**

The identification of potential sites for development within a Local Plan is an important step in establishing where change and growth will happen across a local authority area, as well as the type of development and when it should occur. It is important that the sites that are selected as allocations are based on an understanding of their potential impact upon the historic environment. Several the Council's proposed sites have the potential to impact on heritage assets.

### **Assessment to date**

We appreciate that you have undertaken a process of site assessment to date. We have reviewed the HEELA methodology and criteria and have also reviewed a number of the assessments, both in the HEELA and also the more site assessment booklets.

Whilst these are a helpful starting point and goes some way with the RAG assessments etc. we are looking for more detail, particularly in relation to the amber sites.

Unfortunately, the assessments to date do not follow the five-step methodology for site allocations set out in our Advice note 3 on site allocations.

<https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/> (often referred to as Heritage Impact Assessments or HIAs). In particular, they do not properly consider the significance of the heritage assets, the contribution of setting to that significance, the impact of development upon the significance of those assets and do not consider potential mitigation and enhancement.

### **The need for Heritage Impact Assessments of some sites**

Therefore HIAs should be prepared for a number of sites identified in the Appendix and set out in the list below; this is imperative to ensure a robust evidence base for the Local Plan. These should be prepared in advance of the next draft of the Plan to inform whether some sites are suitable per se, but for the majority of sites to inform the potential mitigation and the policy wording.

In order to help refine which growth allocations to take forward, we would suggest that a Heritage Impact Assessment (HIA) is undertaken of each of the sites following sites (also identified in Appendix A):

SN4053, SN3019, SN4036, SN0432REVA, SN0437, Part of SN0308, SN0220SL, SN1015, SN4052, SN2036, SN2065REV, SN4069SL, SN1024, SN2007, & (Part of)





SN0531, SN0405, SN0406SL, SN0444, SN4079, SN3002SL, (Part of) SN0414, SN4045SL, SN4055, SN0262, SN2183

It is worth emphasising that the inclusion of a site within this list does not automatically mean that it should not be allocated, neither does omission from this list mean that there are no historic environment issues. However, it is clear the issues outlined in this response (in particular the lack evidence and absence of specific development criteria within Policies) will apply to many of the sites proposed for allocation in the Plan. We would therefore urge the Council to review all their site-specific policies to ensure that these general principles are applied to all relevant allocations.

**Site:** SN2183 - Land south of Wymondham Road, Wreningham

It is worth highlighting at this point that we do have particular in principle concerns regarding suitability of this site and suggest more detailed HIA will be needed for this site.

### **Recommended approach to HIAs**

We would refer you to our Advice Note 3 'The Historic Environment and Site Allocations in Local Plans which sets out a methodology for HIA on page 5.

We recommend that the appraisal approach should avoid merely limiting assessment of impact on a heritage asset to its distance from, or inter-visibility with, a potential site. Site allocations which include a heritage asset (for example a site within a Conservation Area) may offer opportunities for enhancement and tackling heritage at risk, while conversely, an allocation at a considerable distance away from a heritage asset may cause harm to its significance, rendering the site unsuitable. Cumulative effects of site options on the historic environment should be considered too.

The following broad steps might be of assistance in terms of assessing sites:

- Identify the heritage assets on or within the vicinity of the potential site allocation at an appropriate scale;
- Assess the contribution of the site to the significance of heritage assets on or within its vicinity;
- Identify the potential impacts of development upon the significance of heritage asset;
- Consider how any harm might be removed or reduced, including reasonable alternatives sites;
- Consider how any enhancements could be achieved and maximised; and





- Consider and set out the public benefits where harm cannot be removed or reduced

The HIAs should assess the suitability of each area for development and the impact on the historic environment. Should the HIA conclude that development in the area could be acceptable and the site be allocated, the findings of the HIA should inform the Local Plan policy including development criteria and a strategy diagram which expresses the development criteria in diagrammatic form.

The HIAs should be proportionate (to significance of assets and the likely impact, and also the size of site).

We would remind you that paragraph 32 of the NPPF makes it clear that significant adverse impacts should be avoided wherever possible and alternative options pursued. Only where these impacts are unavoidable should suitable mitigation measures be proposed. Further detail is given in the attached table.

### **b) Policy wording for some site allocations**

As currently drafted there is either **a lack of criteria or insufficient detail within the site specific policies for the conservation and enhancement of the historic environment**. The NPPF (para 16d) makes it clear that Plans should contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react development proposals. Further advice on the content of policies is given in the PPG at paragraph Paragraph: 027 Reference ID: 61-027-20180913 Revision date: 13 09 2018 that states, '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'.

We note your intention to draft a generic policy that will apply to all sites and can see some merit in this approach. Such a policy will need to reference the historic environment.

However, in addition, it will be important sites where there is heritage impact to include specific criteria for the protection and enhancement of the historic environment. This will provide greater protection for the historic environment and ensure clear and robust policies are in place that provide the decision maker and developers with a clear indication of expectations for the sites.





Where a potential impact is identified, wording should be included in the policy and supporting text to this effect. We suggest the inclusion of additional bullet point in the site allocation. Ideally, the suggested bullet point should mention the specific asset(s), the policy requirement (see wording in appendix) and any potential mitigation required. Further details in relation to site allocation wording are given in the Appendix.

### **Closing comments**

We have suggested a series of other changes to the Plan. Many of these changes suggested do not go to the heart of the Plan's soundness, but instead are intended to improve upon it. We believe that these comments can be addressed by changes to wording in the plan.

In preparation of the forthcoming local plan, we encourage you to draw on the knowledge of local conservation officers, the county archaeologist and local heritage groups.

Please note that absence of a comment on a policy, allocation or document in this letter does not mean that Historic England is content that the policy, allocation or document is devoid of historic environment issues. We should like to stress that this response 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 as a result of this plan, where we consider that these would have an adverse effect upon the historic environment.

If you have any questions with regards to the comments made then please do get back to me. In the meantime we look forward to continuing to work with you and your colleagues.

Yours sincerely,

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