



Historic England

localplan.snc@southnorfolkandbroadland.gov.uk
South Norfolk Place Shaping Team

Our ref:
PL00751046

Telephone 01223 582775

01 March 2023

Dear Mr Harris

South Norfolk Village Clusters Local Plan Regulation 19 Draft Jan – Mar 2023

Thank you for consulting Historic England on the South Norfolk Village Clusters Local Plan Regulation 19 Draft Consultation. 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 see our detailed comments in the attached table. We provide a summary of the main comments below.

SUMMARY

We very much welcome the completion of the Heritage Impact Assessments for a number of sites. The assessments have helped to inform many of the policies providing helpful recommendations for mitigation and enhancement which is welcomed.

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 four issues.



Historic England, Brooklands, 24 Brooklands Avenue, Cambridge CB2 8BU
Telephone 01223 58 2749 HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.
Correspondence or information which you send us may therefore become publicly available.





1. Heritage Impact Assessments

We are delighted to see that Heritage Impact Assessments have been prepared for many sites.

However, there are a few allocations where we recommend the preparation on an HIA now prior to EiP (e.g. VC BRO1 West, VC WOR1). The policy wording should then be amended accordingly. In the absence of an HIA we consider these sites are not sufficiently justified.

There are also some settlement limit extensions where an HIA should also be prepared now ahead of EiP (e.g. SN0020SL, SN0588SL).

Finally, there are some recommendations in HIAs that have not been incorporated into policy. The policies need to be amended to incorporate these HIA recommendations. This applies to a number of sites as set out in the attached table.

Further details of all the relevant sites are given in Appendix A.

2. Settlement Limit extensions

We note that the smaller sites have not been included as allocations but instead the settlement limit has been extended to include that land.

However, there are some extensions which would have an impact on the historic environment and yet, in the absence of a site-specific policy, we are concerned about how the recommendations of the HIAs and any necessary mitigation/enhancement will be secured through an appropriate policy framework.

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: 002 Reference ID: 61-002-20190315 Revision date: 15 03 2019. It 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'*.

3. Archaeology Criterion

Many of the policies include an archaeology criterion which states that 'The HER should be consulted to determine the need for any archaeological surveys prior to development'.

Whilst we welcome the inclusion of a criterion for archaeology, in our view some assessment is needed to inform any planning application (rather than waiting until after permission is granted but before development). This is consistent with the policy set out in para 194 of the NPPF.

We therefore advise that the archaeology criterion should be amended to read, 'Planning applications should be supported by archaeological assessment including





the results of field evaluation where appropriate.' This applies to a number of sites in the Plan.

4. Site-Specific Issues

We have raised a number of quite site-specific issues in relation to the Bressingham, Little Melton, Rockland St Mary and Tasburgh sites. See the attached table for further details of our concerns.

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 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 then please do get back to me. We suggest it would be helpful for us to meet and discuss our comments, resolve any outstanding issues and begin to prepare a Statement of Common Ground. Please contact us to suggest some possible meeting dates.

Debbie Mack
Historic Environment Planning Adviser
Debbie.Mack@HistoricEngland.org.uk

