



**Examination of North Norfolk Local Plan**  
**Matter 9**  
**Delivering Climate Resilient Sustainable Growth Policies**  
**Historic England, Hearing Statement**  
January 2024

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 – Delivering Climate Resilient Sustainable Growth policies.
- 1.2 This hearing statement should be read alongside Historic England's comments submitted at previous consultation stages of the Local Plan, and the Statement of Common Ground (SOCG) between Historic England and North Norfolk District Council (EX023).

## **Matter 9: Delivering Climate Resilient Sustainable Growth (CC policies)**

**Issue: Whether the policies for delivering climate resilient sustainable growth are positively prepared, justified, effective and consistent with national policy.**

**Questions:**

**9.1 Are the CC policies positively prepared, justified, effective and consistent with national policy? Are any main modifications necessary, and if so what should these be?**

2.1 Our detailed comments in relation to policy CC2 are set out under question 9.2.

### **Policy CC7 Flood Risk & Surface Water Drainage**

2.2 Historic England has suggested that reference should be made to the consideration of archaeology in planning for SuDS, not only in terms of the excavation of land (and potential archaeology) but also in terms of dewatering.

2.3 As set out in the SOCG, Historic England maintains that the policy should include reference to archaeology and propose the following criterion:

*'The design of SuDS should take the presence of any buried archaeology into consideration. Direct impacts on buried archaeology should be avoided. Buried archaeological deposits can also be damaged by changes to the water management regime in an area such as a change in groundwater levels or soil moisture content. Where proposals will impact on the significance of designated or non-designated heritage assets, appropriate mitigation should take place as part of the SuDS proposal. Developers should undertake early discussions with Historic England and North Norfolk Council.'*

2.4 The inclusion of this additional criterion would help to ensure the policy is **consistent with national policy** and **effective** in conserving and enhancing the historic environment.

**9.2 Does Policy CC2 provide appropriate guidance for the consideration of Renewable & Low Carbon Energy projects in the district? Are areas classified as moderate-high sensitivity in the Landscape Sensitivity Assessment SPD suitable for development in principle as proposed, and is the assessment sufficiently detailed to determine this? Should moderate-high sensitivity or less be reflected in Figure 5, which appears to be solely based on AONB & Broads designations? Are the other criteria in the policy justified and would they be effective? Has potential windfarm development at the district's airfields been sufficiently assessed to justify the less restrictive policy?**

**Support for promotion of Renewable Energy but concerns regarding evidence and policy wording.**

2.5 While Historic England support the promotion of renewable energy, we continue to have significant concerns regarding the lack of historic environment evidence underpinning the draft policy and mapping (figure 5).

**Minor modification welcomed but insufficient**

2.6 Whilst we acknowledge that the proposed minor modification PMIN/3.2/05 (Examination Document A5.11 [Appendix K: Schedule 4 - Schedule of Proposed Additional Minor Modifications](#)) offers some clarification, we do not consider this sufficient and continue to find the policy and figure 5 unsound.

**Three reasons why policy and map unsound**

2.7 It is considered that the approach of Policy CC2 and the wind energy map is unsound for the following three reasons:-

**1)The identification of specific areas as being suitable for wind energy development is not justified as it is not based upon a sufficiently robust evidence base.**

2.8 The evidence used to inform this policy and map is primarily landscape based (the [North Norfolk Landscape Sensitivity Assessment](#) (LSA) SPD). Whilst the SPD is a helpful starting point, the assessment states that it '*gives no consideration to specific cultural heritage/archaeological issues associated with individual designated heritage assets and their settings*' (see para 1.20 f LSA).

2.9 Closer examination of the Assessment reveals that it is not completely devoid of consideration for historic environment issues. For example, paragraph 2.31 mentions cultural heritage and lists key historic parks and gardens as well as scheduled monuments, conservation areas and listed buildings. However, these do not appear to have not been taken into account in the definition of wind energy areas. Meanwhile the individual assessments for each landscape character type identifies key heritage assets in each area although again they

do not appear to have been taken into account in the definition of wind energy areas.

- 2.10 However, the question remains, is the assessment undertaken to date sufficient in relation to the historic environment, and more importantly, does the resultant output (in terms of the wind energy map) adequately reflect historic environment sensitivities and provide a positive strategy for the conservation and enhancement of the historic environment?
- 2.11 It is our view that there has been insufficient consideration of heritage assets and their settings which in turn makes the policy and map unsound. This opinion is closely linked with the fact that the proposed wind areas are likely to result in harm to heritage assets that could otherwise be avoided. We expand on this under reason 2 below.
- 2.12 We refer you to [Historic England Advice Note 15](#) (February 2021) for further information on commercial scale renewable energy development: Paragraphs 23-27 sets out advice regarding how to assess areas for renewable energy development and the importance of considering heritage assets.

## **2) The areas which have been identified for wind energy development are potentially harmful to heritage assets**

- 2.13 The areas which have been identified for wind energy development could lead to pressure for such developments in locations which would be likely to result in harm to a number of North Norfolk's most important designated heritage assets.
- 2.14 Consequently, the approach to the identification of specific areas as being suitable for wind turbine developments does not demonstrate that the plan is setting out a "*positive strategy for the conservation and enjoyment of the historic environment*" as is required in the NPPF paragraph 196. Therefore, it is **not effective** in protecting the historic environment and is **not consistent with national policy**.
- 2.15 For example, the area identified as suitable for wind turbines would appear to include 13 registered parks and gardens including a small part of the grade I listed Holkham Hall RPG as well as 6 GII\* registered parks and gardens. The area also contains numerous conservation areas including the three very large conservation areas at Glaven Valley, Mannington and Wolterton as well as Gunton Park. The NPPF para 206 makes it clear that heritage assets can be harmed through development within its setting. We are concerned that this potential harm has not been fully explored through the existing evidence.
- 2.16 Furthermore, whilst the Plan identifies former RAF bases as potentially suitable for larger scale wind turbines, these areas are not devoid of historic environment issues. One such example is, RAF Coltishall. This airfield is a Conservation Area, includes two scheduled monuments and a listed building. Airfields can also contain particularly well-preserved archaeology raising the

possibility of nationally important undesignated heritage assets within these areas.

### **3) A receptor buffering approach not appropriate.**

- 2.17 We would emphasise that a receptor buffering approach is neither appropriate nor sufficient to assess impact upon the significance of heritage assets since it fails to engage with their historic landscape, designed landscape, topographic or archaeological context.

### **Further Concerns**

#### **NPPF recent amendment**

- 2.18 Our concern in relation to this policy and map is strengthened by the recent amendments to the NPPF clarifying policy in relation to onshore wind (paragraph 163 and footnotes 57 and 58).

#### **Inconsistency between detailed assessment maps and figure 5**

- 2.19 We are also concerned that some of the more detailed assessment undertaken in the LSA study is not fully reflected in the map of areas suitable for wind energy (figure 5) which appears to be based primarily on the Areas of the AONB and the Broads. The LSA mapping was more nuanced and reflected differences in sensitivity of different character areas including river valleys for example. This detail appears to have been lost in the production of figure 5. The rationale for this is unclear.

- 2.20 In addition, we are surprised and concerned to see that areas assessed as having moderate to high sensitivity in the LSA study are still considered to be suitable for wind turbines as shown on figure 5.

#### **Greater clarification needed in relation to airfield categories**

- 2.21 It is unclear exactly why the airfields have a less restrictive policy. As highlighted above, these areas are not devoid of historic environment issues. One such example is, RAF Coltishall. This airfield is a Conservation Area, contains two scheduled monuments and a listed building. Airfields can also contain particularly well-preserved archaeology raising the possibility of nationally important undesignated heritage assets within these areas. We therefore have some concerns about this less restrictive approach for the airfields.

### **Recommendations to make Plan sound**

#### **The need for additional evidence now to inform Figure 5**

- 2.22 It is our view that the Landscape Sensitivity Assessment does not give sufficient consideration to heritage assets. A separate more heritage specific assessment is needed now. In order to make the Plan sound we recommend

that the wind energy map should give greater consideration to heritage assets and their setting, as described in [Historic England Advice Note 15](#) at paragraphs 23-27. This additional evidence is needed now to inform the map.

- 2.23 This further assessment should follow the advice described in our advice note. Consultation with Historic England is recommended in the development of a methodology and review of findings. We recognise that any further assessment should be proportionate, realistic, achievable and not unduly onerous. We would welcome further discussion in this respect.
- 2.24 As part of this assessment we would recommend that that all registered parks and gardens, scheduled monuments and conservation areas should be excluded from the area identified as suitable for wind turbines. If a settings buffer is also used, any settings buffer should be bespoke to each heritage asset; we suggest that a fixed proximity-based receptor buffering approach should be avoided. If a settings buffer is not used then suitable caveats will be needed in the policy wording/supporting text and on the map.
- 2.25 Figure 5 should then be amended accordingly.
- 2.26 With respect to listed buildings, there needs to be strong caveats in policy and on the map itself requiring detailed heritage impact assessment for listed buildings (and other heritage assets including their settings) at planning application stage.

#### **The need for additional policy wording and supporting text**

- 2.27 In order to make the plan sound we also recommend that the policy wording and supporting text should also be strengthened in relation to heritage assets.
- 2.27 We recommend the following additional wording supporting text, policy and figure 5. We have included the current wording with suggested changes shown in underlined and red.

#### **Onshore Wind Energy**

3.2.8 The PPG states that proposals for wind energy development should not be considered acceptable unless it is located in an area identified as suitable for wind energy development in a Local or Neighbourhood Plan and following consultation, it can be demonstrated that the planning impacts identified by the affected local community have been fully addressed.

3.2.9 Wind energy development proposals will be supported in principle where it can be demonstrated that the landscape sensitivity for the proposed scale of turbine does not exceed 'Moderate - High'. This sensitivity classification maintains opportunities for wind energy development of up to 60m hub/100m tip height across the least sensitive parts of the District. This approach would also allow for large scale wind energy proposals (80m hub, 130m tip wind turbines) at four of the district's airfields; West Raynham, Sculthorpe, Little Snoring and

Coltishall. All proposals should complement the particular characteristics of the surrounding landscape and the LCA will assist in assessing the impact of individual proposals.

*The Wind Energy Areas identified on Figure 5 as suitable areas for such development are essentially priority areas of search for wind turbine development. This does not define the suitability of individual sites for development, nor does it guarantee that an application will be approved in these areas – each case will be considered on its merits at application stage. In addition to being located in these broad areas, proposals will need to meet the policy criteria relating to environmental and amenity impacts set out in Policy CC2. Matters including the number, height, location and design of turbines and associated infrastructure will be considered at application stage. Applicants should explore opportunities for mitigation and enhancement.*

*A detailed heritage impact assessment will be required during the planning application process for each site to consider all designated and non-designated heritage assets and their settings. The Landscape Sensitivity Assessment, which identifies sensitive landscapes and some heritage assets, should be used as a starting point for landscape and heritage assessments for applications. Applications should include visualisations showing the relationship to heritage assets and settings. Viewpoints should be agreed in consultation with interested parties. Cross boundary impacts should be addressed. Harm to the significance of heritage assets should be avoided or minimised through careful and sensitive siting and design.*

## **Policy CC 2**

### **Renewable & Low Carbon Energy**

1. Renewable energy proposals, including from community-led initiatives, will be supported and considered in the context of Sustainable Development and climate change, taking account of the wider environmental, social and economic benefits of renewable energy gain and its contribution towards energy supply.
2. Proposals for renewable energy technology including the landward infrastructure for offshore renewable schemes or the integration of renewable technology on existing or proposed structures with any associated infrastructure, will be supported where the site is located in an area that does not exceed ‘moderate-high’ sensitivity within the Landscape Sensitivity Assessment 2021 SPD and it is demonstrated that any individual or cumulative adverse impacts would be satisfactorily mitigated in respect of all of the following:
  - a. the visual impacts on the surrounding landscape, townscape and landscape character;
  - b. the special qualities of all designated nationally important landscapes and heritage assets including their settings as informed by a site-specific heritage impact assessment including visualisations where these are required to properly understand impacts;
  - c. the special qualities of nationally and internationally designated conservation sites and their qualifying features, habitats and biodiversity;



d. residential and local amenity relating to (visual dominance, noise, fumes, odour, vibration, glint and glare, shadow flicker traffic generation, broadcast interference;

e. air traffic safety, radar, reflected light, radar and telecommunications; and,

f. there is appropriate details / mechanism in place to restore the land to its original use and the removal of the technology at the end of its generating term.

3. The location of all planning proposals for wind turbines will be informed by Figure 5 - Wind Energy Areas, which details the suitable areas for such development and, following consultation, must demonstrate that the planning impacts identified by the affected local community have been fully addressed.

***Additional recommended text for figure 5.***

*'It should be noted that those areas identified as potentially suitable have only been the subject of detailed assessments in respect of Landscape Sensitivity Assessment. No detailed assessment has been undertaken in respect of other factors such potential impacts upon heritage assets or their settings. Any proposal will need to consider such as part of a detailed heritage impact assessment.'*

2.28 The inclusion of these changes to policy wording, supporting text and, importantly, appropriate amendments to both the content and text of figure 5 would help to deliver the dual aims of delivering much needed renewables whilst ensuring that the policy is **justified** by the evidence, **consistent with national policy** and **effective** in conserving and enhancing the historic environment.

2.29 Historic England are willing to continue to work with North Norfolk to seek to find an appropriate way forward in relation to additional assessment (including methodology and revised policy wording that gives sufficient consideration to the historic environment.