



**Examination of North Norfolk Local Plan**  
**Matter 5**  
**Places and Housing Sites**  
**Historic England, Hearing Statement**  
December 2023

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 5 – Places and Housing Sites.
- 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 5: Places & Housing Sites**

**Issue: Whether the housing allocations, settlement boundaries and policy designations in the plan are justified and consistent with national policy and whether the site-specific policies for the allocations are effective.**

- 2.1 Historic England (HE) has agreed some revised policy wording with North Norfolk District Council in relation to a number of sites including NW01/B, NW62A, ST23/2, BRI02 as set out in our SOCG.
- 2.2 However, there are a number of outstanding issues both in relation to some of these and other sites as set out in our SOCG and below in our hearing statement. Our comments relate to the following sites:
- Land West of Pine Tree Farm, Norwich Road (C22/2)
  - Land North of Valley Lane (H17)
  - Land at Heath Farm (H20)
  - Land East of Tunstead Road (HV01/B)
  - Land at Norwich Road & Nursery Drive (NW01/B)
  - Land West of North Walsham (NW62/A)
  - Land South of Butts Lane (SH18/1B)
  - Land North of Yarmouth Road, East of Broadbeach Gardens (ST23/2)
  - Land East of Astley Primary School (BRI01)
  - Land West of Astley Primary School (BRI02)
  - Land off Cromer Road & Church Lane (MUN03/B)
- 2.3 We have set out our concerns and the proposed wording we are seeking to ensure that the policies are justified, effective and consistent with national policy.
- 2.4 Each site is considered on a separate page of this statement.

## **5.2 Cromer**

### **5.2.5 Land West of Pine Tree Farm, Norwich Road (C22/2)**

**d) Have the impacts and effects of development been properly taken into account?**

**i) Are the site-specific requirements for development of the site justified, consistent with national policy and would they be effective?**

2.5 Historic England welcomes the preparation of the revised Heritage Impact Assessment (HIA)<sup>1</sup> for the enlarged site. The HIA considers the potential impacts of the development on heritage assets and makes a number of helpful policy recommendations.

2.6 As set out in our SoCG, in reviewing the HIA again, Historic England has identified three mitigation recommendations from the HIA that are missing from the policy criteria. These are:

- Landscaped buffer along the western boundary of the site
- Dwellings of one or one and a half storey height on the southernmost part of the site.
- Enhance existing tree belt and landscaping close to Pine Tree Farm and adjacent to Norwich Road (A149).

2.7 It is our view that the impacts, effects and consequent recommendations in the HIA have not been fully taken into account in the policy formulation. To that end, the site-specific requirements for the development of the site would not be effective and would not be consistent with national policy to secure the conservation and enhancement of the historic environment.

2.8 We therefore recommend that the policy criteria are amended as follows:

4. Careful attention to site layout, building heights and materials in order to minimise the visual impact of the development on the Norfolk Coast Area of Outstanding Natural Beauty. Building heights should be restricted to one or 1.5 storey height on southern part of site;

8. Retention and enhancement of hedgerows and trees around and within the site, including the protection of existing woodland within site and the provision of a landscaped buffer along the southern and western boundaries;

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<sup>1</sup> see Historic Impact Assessment – updated examination document C10 which includes assessments for all sites

15. Development should preserve and enhance the setting of the grade II listed Pine Tree Farmhouse through careful layout, design and landscaping including enhancement of tree belt and landscaping close to the Farmhouse.

2.9 The inclusion of this change would help to ensure that site-specific requirements for development of the site are **justified** by the findings of the HIA, **consistent with national policy** and **effective** in conserving and enhancing the historic environment.

## **5.4 Holt**

### **5.4.3 Land North of Valley Lane (H17)**

**d) Have the impacts and effects of development been properly taken into account?**

**i) Are the site-specific requirements for development of the site justified, consistent with national policy and would they be effective?**

2.10 Historic England welcomes the preparation of the HIA for the site. The HIA considers the potential impacts of the development on heritage assets and makes a number of helpful policy recommendations.

2.11 As set out in our SoCG, in reviewing the HIA again, Historic England has identified two mitigation recommendations from the HIA that are missing from the policy criteria. These are:

- Seek to retain a view toward the Glaven Valley from Norwich Road
- A Heritage Statement is required to assess the archaeological importance of the site.

2.12 There is currently a good view of the Glaven Valley from Norwich Road between numbers 4a and 6. It is this view that should be retained through careful master planning of the site.

2.13 It is our view that the impacts, effects and consequent recommendations in the HIA have not been fully taken into account in the policy formulation. To that end the site-specific requirements for the development of the site would not be effective and would not be consistent with national policy to secure the conservation and enhancement of the historic environment.

2.14 We therefore recommend an additional policy criterion as follows:

- 'Retention of view towards Glaven Valley from Norwich Road (between 4a and 6 Norwich Road) through careful master planning.'

2.15 The inclusion of this change would help to ensure that site-specific requirements for development of the site are **justified** by the findings of the HIA, **consistent with national policy** and **effective** in conserving and enhancing the historic environment.

2.16 We agree with the Council that the second point regarding heritage statement is covered by policy ENV7.

#### 5.4.4 Land at Heath Farm (H20)

d) Have the impacts and effects of development been properly taken into account?

i) Are the site-specific requirements for development of the site justified, consistent with national policy and would they be effective?

2.17 Historic England welcomes the preparation of the HIA for the site. The HIA considers the potential impacts of the development on heritage assets and makes a number of helpful policy recommendations.

2.18 As set out in our SoCG, in reviewing the HIA again, Historic England has identified a key mitigation recommendation from the HIA that is missing from the policy criteria which relates to density and height:

- Low density and single storey development to the southern, northern and western parts of the site

2.19 It is our view that the impacts, effects and consequent recommendations in the HIA have not been fully taken into account in the policy formulation. To that end the site-specific requirements for the development of the site would not be effective and would not be consistent with national policy to secure the conservation and enhancement of the historic environment.

2.20 We therefore recommend an additional policy criterion as follows:

- 'Low density, single storey development to the southern, northern and western parts of the site.'

2.21 The inclusion of this change would help to ensure that site-specific requirements for development of the site are **justified** by the findings of the HIA, **consistent with national policy** and **effective** in conserving and enhancing the historic environment.

## **5.5 Hoveton**

### **5.5.3 Land East of Tunstead Road (HV01/B)**

**d) Have the impacts and effects of development been properly taken into account?**

**i) Are the site-specific requirements for development of the site justified, consistent with national policy and would they be effective?**

2.22 Historic England welcomes the preparation of the HIA for the site. The HIA considers the potential impacts of the development on heritage assets and makes a number of helpful policy recommendations.

2.23 As set out in our SoCG, in reviewing the HIA again, Historic England has identified a key mitigation recommendation from the HIA that is missing from the policy criteria which relates to density and height:

- Lower density, single storey dwellings on the northern part of the site

2.24 It is our view that the impacts, effects and consequent recommendations in the HIA have not been fully taken into account in the policy formulation. To that end the site-specific requirements for the development of the site would not be effective and would not be consistent with national policy to secure the conservation and enhancement of the historic environment.

2.25 We therefore recommend amending policy criterion 1 as follows:

- ‘1. Delivery of a carefully designed residential development that will integrate into the surrounding character, with lower density, single storey dwellings on the northern part of the site.’

2.26 The inclusion of this change would help to ensure that site-specific requirements for development of the site are **justified** by the findings of the HIA, **consistent with national policy** and **effective** in conserving and enhancing the historic environment.



## **5.6 North Walsham**

### **5.6.3 Land at Norwich Road & Nursery Drive (NW01/B)**

**d) Have the impacts and effects of development been properly taken into account?**

**i) Are the site-specific requirements for development of the site justified, consistent with national policy and would they be effective?**

2.27 Historic England welcomes the preparation of the HIA for the site. The HIA considers the potential impacts of the development on heritage assets and makes a number of helpful policy recommendations.

2.28 As set out in our SoCG, in reviewing the HIA again, Historic England has identified that the HIA recommendation for lower density single storey development to be located at the south of the site has not been incorporated into the policy.

2.29 Whilst recognising that the Council have chosen not to include this in their policy wording, our preference would be for this requirement to be included in the policy criteria, in line with the HIA recommendations.

2.30 We therefore recommend an additional policy criterion as follows:

- 'Low density, single storey development to the southern part of the site.'

2.31 The inclusion of this change would help to ensure that site-specific requirements for development of the site are **justified** by the findings of the HIA, **consistent with national policy** and **effective** in conserving and enhancing the historic environment.

#### 5.6.4 Land West of North Walsham (NW62/A)

d) Have the impacts and effects of development been properly taken into account?

i) Are the site-specific requirements for development of the site justified, consistent with national policy and would they be effective?

2.32 Historic England welcomes the preparation of the HIA for the site. The HIA considers the potential impacts of the development on heritage assets and makes a number of helpful policy recommendations.

2.33 HE welcomes the proposed modifications to policy (PMIN/14.3/04 & PMIN/14.3/05) which better reflects the recommendations of the Heritage Impact Assessment.

2.34 However, the policy should also reference open space/sports facilities in the southern portion of the site to protect the battlefield site as has been included in the draft masterplan SPD (document [EX010](#)) for the site.

2.35 While we acknowledge and welcome the inclusion of this in the emerging draft masterplan/development brief, our preference would be for this requirement to be included in the Local Plan policy criteria.

2.36 We therefore recommend an additional policy criterion as follows:

- 'Open space/sports facilities should be include in the southern portion of the site to protect the battlefield site and its setting.'

2.37 The inclusion of this change would help to ensure that site-specific requirements for development of the site are **justified** by the findings of the masterplan, **consistent with national policy** and **effective** in conserving and enhancing the historic environment.

## **5.7 Sheringham**

### **5.7.6 Land South of Butts Lane (SH18/1B)**

**d) Have the impacts and effects of development been properly taken into account?**

**i) Are the site-specific requirements for development of the site justified, consistent with national policy and would they be effective?**

2.38 Historic England welcomes the preparation of the HIA for the site. The HIA considers the potential impacts of the development on heritage assets and makes a number of helpful policy recommendations.

2.39 As set out in our SoCG, in reviewing the HIA again, the main mitigation recommendations from the HIA that are missing from the policy criteria relate to density and height. These are:

- Lower density dwellings on the north and the western extents of the site
- Single storey dwellings on the west of the site to respect the wider landscape

2.40 It is our view that the impacts, effects and consequent recommendations in the HIA have not been fully taken into account in the policy formulation. To that end the site-specific requirements for the development of the site would not be effective and would not be consistent with national policy to secure the conservation and enhancement of the historic environment.

2.41 We therefore recommend an additional policy criterion as follows:

- *‘Low density, development in the northern and western parts of the site. With single storey development on the west of the site.’*

2.42 The inclusion of this change would help to ensure that site-specific requirements for development of the site are **justified** by the findings of the HIA, **consistent with national policy** and **effective** in conserving and enhancing the historic environment.

## **5.8 Stalham**

### **5.8.4 Land North of Yarmouth Road, East of Broadbeach Gardens (ST23/2)**

**d) Have the impacts and effects of development been properly taken into account?**

**i) Are the site-specific requirements for development of the site justified, consistent with national policy and would they be effective?**

2.43 Historic England welcomes the preparation of the HIA for the site. The HIA considers the potential impacts of the development on heritage assets and makes a number of helpful policy recommendations.

2.44 HE welcomes the proposed modifications to policy (PMIN/16.2/03 & PMIN/16.2/04) which better reflects the recommendations of the Heritage Impact Assessment.

2.45 As set out in our SoCG, however, the HIA recommendation regarding density on the western part of the site, open space on the eastern part of the site and density and landscaping on the northern part of the site has not been incorporated into the policy. While we appreciate that density and landscaping are mentioned in the policy, the specifics of the locations of these are not.

2.46 It is our view that the impacts, effects and consequent recommendations in the HIA have not been fully taken into account in the policy formulation. To that end the site-specific requirements for the development of the site would not be effective and would not be consistent with national policy to secure the conservation and enhancement of the historic environment.

2.47 We therefore recommend the following changes to the criterion 1 and the proposed modification for criterion 7 to read:

- *1 Prior approval of a master plan to address access, mix of uses including provision of serviced employment land, layout, density of development (with low density development on the western and northern parts of the site) , landscaping and conceptual appearance.*
- *'7. . appropriate Layout and design, of landscape buffering, particularly on the northern, eastern and western boundaries of the site and an area of open space on the eastern part of the site, should be implemented, in order to protect and enhance the settings of the adjacent Listed Buildings, other nearby heritage assets and the Stalham Conservation Area;'*

2.48 The inclusion of this change would help to ensure that site-specific requirements for development of the site are **justified** by the findings of the HIA, **consistent with national policy** and **effective** in conserving and enhancing the historic environment.

## **5.11 Briston**

### **5.11.3 Land East of Astley Primary School (BRI01)**

**d) Have the impacts and effects of development been properly taken into account?**

**i) Are the site-specific requirements for development of the site justified, consistent with national policy and would they be effective?**

2.49 Historic England welcomes the preparation of the HIA for the site. The HIA considers the potential impacts of the development on heritage assets and makes a number of helpful policy recommendations.

2.50 As set out in our SoCG, in reviewing the HIA again, the main mitigation recommendations from the HIA that is missing from the policy criteria are:

- Development should conserve, or where appropriate enhance, the significance of nearby heritage assets (including any contribution made to that significance by setting) including, Manor Farmhouse, a grade II listed building.
- Respect and reflect the massing and heights of surrounding dwellings and buildings, many of which are single and one and a half storeys in height;
- Existing hedgerows / landscaping to be retained and enhanced on the eastern, western and southern boundaries and preferably on northern boundary depending on access arrangements;

2.51 It is our view that the impacts, effects and consequent recommendations in the HIA have not been fully taken into account in the policy formulation. To that end the site-specific requirements for the development of the site would not be effective and would not be consistent with national policy to secure the conservation and enhancement of the historic environment.

2.52 We therefore recommend amending policy criterion 1 as follows:

- *‘Retention of existing roadside hedges and setting back of development on both road frontages. Retention and enhancement of hedgerows along southern and eastern boundaries.’*

2.53 We also recommend adding a new criterion:

- *‘Development to respect height and massing of surrounding area.’*

2.54 The inclusion of this change would help to ensure that site-specific requirements for development of the site are **justified** by the findings of the

HIA, **consistent with national policy** and **effective** in conserving and enhancing the historic environment.

- 2.55 We note the proposed modification PMIN/19.1/02 to add a new policy criterion to BRI02 as follows:

*Development should conserve or where appropriate enhance the significance of heritage assets (including any contribution made to the significance by setting) both within the site and the wider area including Manor Farmhouse, a Grade II listed building.*

- 2.56 However, this would be more appropriate for policy BRI01 which is closer to the Manor Farmhouse.

**m) Are Briston and Melton Constable considered to be two settlements, and if so is physical coalescence of settlements an issue?**

- 2.57 HE had previously raised the issue of coalescence in relation to this site. We welcome the commitment to set back development along the road frontage to maintain a sense of openness and separation in criterion 1 of site BRI02. This helps to address our previous concerns.

#### 5.11.4 Land West of Astley Primary School (BRI02)

d) Have the impacts and effects of development been properly taken into account?

i) Are the site-specific requirements for development of the site justified, consistent with national policy and would they be effective?

2.58 Historic England welcomes the preparation of the HIA for the site. The HIA considers the potential impacts of the development on heritage assets and makes a number of helpful policy recommendations.

2.59 As set out in our SoCG, in reviewing the HIA again, the main mitigation recommendations from the HIA that is missing from the policy criteria are:

- Respect and reflect the massing and heights of surrounding dwellings and buildings, which are a mixture of single and two storeys
- Landscaping to the eastern boundary should be extended and enhanced to create a gap between the settlements
- Open space should be located on the eastern boundary to further create a gap between the settlements

2.60 It is our view that the impacts, effects and consequent recommendations in the HIA have not been fully taken into account in the policy formulation. To that end the site-specific requirements for the development of the site would not be effective and would not be consistent with national policy to secure the conservation and enhancement of the historic environment.

2.61 We therefore recommend amending policy criterion 9 as follows:

- *9. Retention and enhancement of existing hedgerows and landscaping to all the site boundaries particularly to the east and west. Landscaping and open space along eastern boundary to retain gap between settlements; and,*

*We also recommend a new criterion to read:*

- *'Development to respect height and massing of surrounding area.'*

2.62 We note the proposed modification PMIN/19.1/02 to add a new policy criterion to BRI02 as follows:

*Development should conserve or where appropriate enhance the significance of heritage assets (including any contribution made to the significance by*



*setting) both within the site and the wider area including Manor Farmhouse, a Grade II listed building.*

2.63 However, this would be more appropriate for policy BRI01 which is closer to the Manor Farmhouse.

**m) Are Briston and Melton Constable considered to be two settlements, and if so is physical coalescence of settlements an issue?**

2.64 HE had previously raised the issue of coalescence. We welcome the commitment in criterion 1 to set back development along the road frontage to maintain a sense of openness and separation. This helps to address our previous concerns.

## **5.13 Mundesley**

### **5.13.3 Land off Cromer Road & Church Lane (MUN03/B)**

**d) Have the impacts and effects of development been properly taken into account?**

**i) Are the site-specific requirements for development of the site justified, consistent with national policy and would they be effective?**

2.65 Historic England welcomes the preparation of the revised HIA for to reflect the new site area. The HIA considers the potential impacts of the development on heritage assets and makes a number of helpful policy recommendations.

2.66 HE welcomes criterion 1 and 2 which capture the recommendations in the HIA.