



Examination of the Broads Authority Local Plan

Matters, Issues and Questions

Historic England, Hearing Statement

June 2018

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 Matters 9, 10, 11, and 12 of the Local Plan. This Hearing Statement has been written with reference to the Council's Schedule of Proposed Changes (March 2018).
- 1.2 This hearing statement should be read alongside Historic England's comments submitted at previous consultation stages of the Local Plan dated: 8th April 2016, 11th April 2016, 1st February 2017, 5th January 2018.

Inspector's Questions

Matter 9 – Natural and Historic Environment

Issue – Does the Plan set out positively prepared policies for conserving and enhancing the natural and historic environment which are justified, effective and consistent with national policy?

Q b. Do policies PUBSP5, PUBDM10 and PUBDM11 provide an effective framework for conserving and enhancing heritage, which is in line with national guidance? Is the requirement to consider employment, recreation or tourism uses in preference to residential use, as set out in policy PUBDM11, justified and soundly based?

As outlined within our representation dated 5th January 2018, Historic England considers these three policies to be robust and that they provide a good strategic policy basis for the conservation and enhancement of the historic environment. Policies PUBSP5 and PUBDM10 comprehensively address The Broads' varied heritage assets. We are pleased to see that the Council's Schedule of Proposed Changes (March 2018) includes an amendment (ref. 35 pg. 6) to the supporting text to address conservation areas at risk as advised in our previous representation.

We welcome proposed change ref. 36 pg. 7 of the Schedule in principle, however as worded it doesn't make sense as it only refers to physical remains and not any information that may occur as a result. The amendments should cover both the physical remains AND the information they generate, this change will strengthen the policy and will better reflect the NPPF.

In terms of Policy PUBDM11, regarding the re-use of historic buildings, Historic England advocates that the best use for a historic building is its original use. If it is not possible to return the building to its original use an alternative beneficial use that is commensurate with the building's conservation should be sought. Historic England has no preference as to what this use should be and indeed alternative uses will depend on the level of intervention required to facilitate that use in accordance with conservation best practice. This will ultimately be founded upon the merits of each individual case, the condition of each individual building and the unique opportunities each building will present. Equally, planning for a range of different uses can contribute to the vitality and character of an area. The adaptive reuse of historic or traditional buildings can be especially useful in helping to support the rural economy. Certainly this approach is a good place making principle when the impacts of a dominant use are seen to be detrimental to the quality, distinctiveness and character of an area for example through the dominance of second homes which remain unoccupied for long periods of time. From a historic environment perspective these policies are well considered, appropriate and in accordance with the NPPF's concept of sustainable development.

The Schedule of Proposed Changes (ref. 38) includes adding the Norfolk and Suffolk Historic Environment Record (HER) to the list of relevant documents. This is a welcome change and will signpost readers to the HER for more information and better reflects paragraph 128 of the NPPF which states that the HER should be consulted as a minimum.

Matter 10 – Other environment policies

Issue – Does the Plan set out positively prepared policies for conserving and enhancing the natural and historic environment which are justified, effective and consistent with national policy?

Q d. (part iv) Does policy PUBDM18 give sufficient recognition to the effect of utilities infrastructure on the historic environment.

In order to provide adequate protection and to provide a positive strategy for the historic environment the policy should identify the link between place, locality and the historic environment within the context of utilities infrastructure developments. Utilities infrastructure can have significant impacts upon the character and appearance of heritage assets such as conservation areas which are sensitive to the accumulation of utilities equipment. We welcome proposed change ref. 49 pg. 9 which, if included, will give sufficient

recognition to the effect of utilities of the historic environment. We also welcome proposed change ref. 50 pg 70 which is a change we requested.

Matter 11 – Transport, the economy and tourism

Issue – Does the Plan set out positively prepared policies for sustainable travel and safe access, and supporting a thriving economy and tourism sector which are justified, effective and consistent with national policy?

Q d. (part i) Does policy PUBDM24 provide sufficient protection for the natural and historic environment

The policy would be strengthened by adding reference to conserve or where appropriate enhance the historic environment alongside landscape character in policy criterion ii). We therefore welcome proposed change ref. 55 pg. 81 however; this was not raised specifically in our previous response which was an oversight.

Matter 12 – Site Specific policies

Issue – Are the proposed allocations justified, effective, developable/deliverable and in line with national policy?

Policy PUBBEC 1: Former Loaves and Fishes, Beccles

Q b. Does the policy provide suitable protection for the historic environment?

The policy encourages the enhancement of the historic environment in the first instance. Given the Council has made the assessment of the site and feels that it is one capable of enhancement we would support their amendment.

Policy PUBBEC 2: Beccles residential moorings (Hippersons Boatyard)

Q b. Does the policy provide sufficient protection for the historic environment?

The policy does reference the presence of the nearby conservation area but the policy does not provide sufficient protection for the historic environment as

it does not refer to the need to have regard to the setting of the conservation area. Although the site itself is not in the conservation area, its development has the potential to detrimentally affect the significance of the conservation if it is not sensitively designed. Proposed change ref. 79 pg. 141 is welcomed as it proposes to include specific reference to the conservation area and its setting. The policy would be strengthened however if amended to, *'Development should preserve or where opportunities arise enhance the character or appearance of the Conservation Area and its setting'*. This is based on the wording in Part 2, paragraph 69 (a) of the Planning (Listed Buildings and Conservation Areas) Act 1990 and para 137 of the NPPF.

Policy PUBHOV3: Brownfield land off Station Road

Q c. Does the policy provide suitable protection for the historic environment?

As advised in our previous representation the policy should refer to the need for development to consider the setting of the nearby scheduled monument of Wroxham Bridge. We note proposed change re. 101 pg. 162, but the wording is weaker than the NPPF. We recommend that the wording is changed to *"development proposals will conserve and where appropriate enhance the setting of the nearby Wroxham Bridge Scheduled Monument"*. This is based on the wording in the Planning Practice Guidance Paragraph: 003 Reference ID: 18a-003-20140306 Revision date: 06 03 2014.

Conclusions

- 2.1 To conclude, Historic England recommended a number of minor changes to improve the effectiveness and soundness of the plan. We are pleased to see that these changes appear in the Council's Schedule of Proposed Changes (March 2018).
- 2.1 The Schedule includes a number of changes which are not addressed within the Inspector's Matters, Issues and Questions, so they have not been discussed here. The changes proposed however are all positive and will improve the effectiveness of the Plan.