

# **King's Lynn and West Norfolk Local Plan: Site Allocations and Development Management Policies**

## **Independent Examination**

### **Statement for Issue 14: Castle Acre**

**On behalf of Holkham Estate and Grange Developments  
- Representation number 1249**

**June 2015**

#### **Prepared by**

Savills (UK) Limited  
*Unex House*  
*132-134 Hills Road*  
*Cambridge*  
*CB2 8PA*

CAPL/329263/A6/HH

**Kings Lynn and West Norfolk Local Plan: Site Allocation and Development Management Policies – Independent Examination**

**Savills (Representation number: 1249) Statement on behalf of Holkham Estate and Grange Developments**

**Issue 14: Castle Acre**

“Question 14.1 –

Is there evidence that any elements of the proposed development west of Massingham Road (G22.1) are not justified, sustainable, viable, available or deliverable? If such evidence exists what alternatives are available and have they been satisfactorily considered by the Council?”

- 1.1 Savills (UK) Ltd has been instructed by the Holkham Estate and Grange Developments to submit relevant and necessary hearing statements in response to the Kings Lynn and West Norfolk Site Allocations and Development Management Policies Examination. Savills (UK) Ltd have previously submitted representations in response to previous rounds of consultation, including Preferred Options consultation in September 2013 and Pre-Submission Publication in January 2015. These related to a number of matters, but included the proposed allocation of land to the west of Massingham Road, Castle Acre.
- 1.2 Savills (UK) Ltd has submitted a planning application in June 2015 to Kings Lynn and West Norfolk Council on behalf of the Holkham Estate and Grange Developments for;  
  
*“Hybrid application comprising: full planning application for the demolition of existing buildings and the erection of four dwellings (Use Class C3) with associated access, landscaping and infrastructure, and; outline planning application with all matters reserved apart from access for the erection of up to eleven dwellings (Use Class C3)”.*
- 1.3 This application follows two previous applications submitted in relation to a smaller part of the site, which is occupied by three derelict cottages (known as Rose Cottages and Albemar).
- 1.4 The most recent of these was an application for the ‘Demolition of derelict cottages and construction of four dwellings and garages with access’, at Rose Cottage, Massingham Road, Castle Acre (application reference 14/01181/F). This application was refused planning permission on the 3rd December 2014 for the following reasons:
  1. *The proposal fails to deliver a comprehensive development of site G22.1 as required by proposed policy G22.1 and therefore fails to full take account of the opportunities available for improving the character and quality of the area as required by paragraph 64 of the NPPF.*
  2. *Given the concerns expressed by English heritage and harm they have identified, it is not considered that, in the absence of a comprehensive scheme for site G22.1, the public*

*benefits of the scheme outweigh the harm caused to the character of the Conservation Area caused by the loss of the existing cottages, contrary to paragraph 134 of the NPPF and policy CS12.*

*3. The site forms part of a wider Local Plan housing allocation, G22.1, and as such should provide affordable housing in accordance with proposed policy DM8 and Core Strategy policy CS09. No such provision has been made as part of this proposal and the proposal is therefore contrary to the provisions of proposed policy DM8 and to Core Strategy policy CS09.*

- 1.5 A similar application for 'demolition of derelict cottages and construction of four dwellings and garages with access' at Rose Cottage, Massingham Road, was submitted in February 2014 but withdrawn by the applicant, in light of a revised scheme coming forward.
- 1.6 We consider that the new planning application, which covers approximately 1.23ha of land (including land for access and highways improvements) responds to these reasons for refusal, providing a comprehensive development of the entire site. The nature of the hybrid application means that the land which fronts Massingham Road can come forward immediately for development, whilst at the same time allowing flexibility over the land further to the west which is the subject of the outline application. An Indicative Layout (see **Appendix 1**) supports the application, and shows how the site can come forward in a comprehensive manner.
- 1.7 The proposal is supported by a Design and Access Statement (see **Appendix 2**) which shows how the proposal will improve the character and quality of the area, as required by paragraph 64 of the NPPF. Rose Cottages and Albemar are dwellings which have been unoccupied for some time and are in a poor state, detracting visually from the appearance of the Conservation Area. The garden land to the rear is unkempt and adds to the eyesore. The Heritage Statement concludes that these buildings are of some limited significance, which is historical rather than architectural. Although the harm caused by their demolition is less than substantial, the public benefit of the development, in a co-ordinated manner and the removal of a detracting eyesore, outweighs the harm caused.
- 1.8 Further details of how the public benefit outweighs the harm caused to the character of the Conservation Area can be found in the Heritage Statement contained within **Appendix 3**. This explains the effect of the proposal on the significance of Castle Acre Conservation Area, and the setting of Stone Barn, a grade II listed building, situated on the opposite side of Massingham Road. This concludes that any harm is out-weighed by the public benefit of developing the land.

- 1.9 Comprehensive development of the site also allows for affordable housing to come forward, which is policy compliant at 20%.

Is there any evidence that the proposed development is not justified?

- 1.10 We consider that the proposed allocation is justified i.e. the most appropriate strategy when considered against reasonable alternatives, based on proportionate evidence. The site is proposed to be developed for up to 15 dwellings, which provide a low density development, in-keeping with the surroundings. Private amenity space, landscaping, public open space and appropriate infrastructure can all be accommodated within the site.

Is there any evidence that the proposed development is not sustainable?

- 1.11 The site is considered to be in a sustainable location, a short distance away from local amenities. It has good pedestrian links to the centre of the settlement, which are further improved through proposed footpath improvements along the edge of the site. The primary school, playing fields and village facilities are all within walking distance.
- 1.12 There are bus services available within walking distance of the site, providing links to Fakenham and Kings Lynn. The nearest rail station is approximately 13 miles away in Kings Lynn, providing direct hourly services between Kings Lynn, Ely, Cambridge and London Kings Cross.
- 1.13 There are two secondary schools within a 5 mile (8km radius), and school buses are provided to both schools from the settlement. There are also various facilities within Castle Acre, including local stores, a post office, sports pitches, pubs and a café.
- 1.14 Employment opportunities can be found at the nearby settlements of Kings Lynn and Fakenham. There are a limited number of opportunities in the local settlements, which are generally tourism/leisure related.

Is there any evidence that the proposed development is not viable?

- 1.15 The Holkham Estate is a major landowner within Norfolk and have actively promoted and progressed planning applications on a number of similar sites, of varying sizes, in the past. The Estate does not consider this application to be unviable in any way. Likewise, Grange Developments are a local housebuilder who undertake work of a similar scale, and have a proven track record of successful residential developments. The site has been actively promoted for a number of years, and there are no reasons why the site could be considered to be unviable.

Is there any evidence that the proposed development is not available?

- 1.16 The western part of the site is owned by the Holkham Estate, and the land fronting Massingham Road is under option by Grange Developments. This land is within a private family ownership, and in the process of being transferred to Grange Developments. The current cottages and their associated garden land are vacant. The land needed for the highways improvements are owned by Norfolk County Highways. A land registry search has shown no reasons why the land availability could be considered to be restricted.

Is there any evidence that the proposed development is not deliverable?

- 1.17 In support of the submitted planning application, a number of technical studies have been undertaken. These conclude that there are no technical reasons why development of the site could not come forward and is therefore considered deliverable from a technical perspective.
- 1.18 A Transport Statement and detailed highways drawings accompany the application. Visibility splays of 2.4m by 59m, as requested by NCC Highways, can be accommodated. These show that the site can safely be accessed from Massingham Road.
- 1.19 Pre-application discussions have taken place with Norfolk County Highways. As a result of these discussions, it is proposed that the western side of Massingham Road is to be realigned to provide a constant 4.8m road width across the development frontage. A 1.8m wide footpath will be constructed to link in with the footpath that currently terminates at the southern boundary of Albemar. This will provide a safe walking route to the primary school.
- 1.20 A Flood Risk Assessment and Foul Water Drainage Strategy has been prepared in support of the application. The site is not located within the flood zone. The surface water runoff from the proposed development has been considered. The surface water runoff from the dwellings will discharge into plot soakaways within the back gardens of the plots. The soakaways have been designed to contain up to and including the 1 in 100 year storm event including the effects of climate change.
- 1.21 Surface water runoff from the access road will discharge into the soakaway located beneath the public open space. This will also add to the ecology and amenity potential of the site.
- 1.22 With the mitigation measures put in place, the proposed development will result in low risk to the site users and residents. No existing development adjacent or downstream of the site will be at an increased risk of flooding due to the effects of the proposed development.
- 1.23 The foul drainage will be connected to the existing foul public sewer. It is likely that all of the outline development site will discharge by a gravity sewer in the new access road to a pumping station in the south west corner of the site.

- 1.24 A number of ecological surveys have taken place. These are currently on-going due to seasonal constraints, but there are no ecological reason why a comprehensive development of the site can not be achieved.
- 1.25 There are no trees on site that would be effected by the proposals. All of the existing hedges that surround the detailed application area will be retained.
- 1.26 The presence and subsequent demolition of buildings on the site does give rise to the presence of localised areas of Made Ground and as such, these soils have been identified as potentially containing contamination. Whilst the presence of Made Ground will need to be investigated it is not envisaged that this will pose a particular barrier to redevelopment. The section of the site used as agricultural fields is considered unlikely to have been affected by contamination.
- 1.27 There are therefore no technical reasons which would restrict deliverability of the site.

If such evidence exists what alternatives are available and have they been satisfactorily considered by the Council?

- 1.28 Land to the west of Massingham Road, Castle Acre, is available, deliverable and achievable, in compliance with the requirements set out the NPPF. There are therefore no reasons why alternative sites should be considered. We consider the proposed allocation to be the most suitable and sustainable location for development within the settlement. It is close to local amenities, and there are no technical reasons why development of the site cannot come forward as soon as possible. The progression of a planning application on the site shows the landowners strong commitment to bringing this site forward, and demonstrates how a policy complaint, comprehensive development can come forward. Alternatives have been considered by both the local Council and parish Council, and this site is considered to be the most suitable. The Parish Council have also shown their support for the proposals.

## **APPENDIX 1 – INDICATIVE LAYOUT**





## **APPENDIX 2 – DESIGN AND ACCESS STATEMENT**

**JOHN SELBY** BA MSc IHBC  
CONSERVATION & PLANNING

## **Design & Access Statement**

**Land west of  
Massingham Road  
Castle Acre  
Norfolk  
PE32 2BG**

**28<sup>th</sup> May 2015**

**Design & Access Statement**

Land west of Massingham Road, Castle Acre

<b>Contents</b>	<b>Page</b>
<b>1.0 INTRODUCTION &amp; PRE-APPLICATION ADVICE</b>	<b>3</b>
<b>2.0 USE</b>	<b>6</b>
<b>3.0 AMOUNT</b>	<b>6</b>
<b>4.0 LAYOUT, SCALE &amp; APPEARANCE</b>	<b>7</b>
<b>5.0 LANDSCAPING</b>	<b>9</b>
<b>6.0 ACCESS</b>	<b>10</b>
<b>7.0 CONCLUSION</b>	<b>10</b>

## 1.0 INTRODUCTION & PRE-APPLICATION ADVICE

- 1.1 This Design & Access Statement has been written to support a hybrid planning application for detailed planning permission for the demolition of Rose Cottages and 'Albemar' and the erection of four dwellings, with associated access, landscaping and infrastructure and an outline planning application with all matters reserved, apart from access, for the erection of up to eleven dwellings, all on land to the west of Massingham Road, Castle Acre.
- 1.2 This Statement has been written to follow the guidance provided by the Commission for Architecture and the Built Environment (CABE) contained in *Design & Access Statements: How to write, read and use them* (reprinted 2007).
- 1.3 The site lies at the northernmost part of Castle Acre village on the west side of Massingham Road. The area, which forms the full planning application, is occupied by a pair of derelict cottages (Rose Cottages) sited at the back of the verge, very close to the highway. It also includes the house known as Albemar, which is gable-onto and sited very close to the highway. Further south of Albemar lies an estate of modern dwellings the majority of which are semi-detached. The level of the site drops westwards away from Massingham Road considerably with a gentler slope southerly along the western boundary back towards the village. The application site retains established native hedging and the land beyond these boundaries is open countryside. To the east on the opposite side of the road, is the listed 'Stone Barn' and associated flint roadside walls. The barn has been converted to residential use with further recent development behind.
- 1.4 An application for planning permission for the demolition of Rose Cottages and the erection of four dwellings with garages and access was submitted in 2014 (ref. 14/00148/F). This was withdrawn in April 2014 and a revised scheme submitted, again proposing four dwellings following the demolition of Rose Cottages (ref. 14/01181/F). The design of the resubmitted scheme for four dwellings reflected a farmyard and was developed following extensive pre-application discussion with planning and conservation officers and incorporated the views of the Council's Conservation Areas Advisory Panel.

1.5 The revised application (14/01181/F) was refused on the 3<sup>rd</sup> December 2014 for the following reasons:

1. The proposal fails to deliver a comprehensive development of site G22.1 as required by proposed policy G22.1 and therefore fails to fully take account of the opportunities available for improving the character and quality of the area as required by paragraph 64 of the NPPF.
2. Given the concerns expressed by English Heritage and the harm they have identified, it is not considered that, in the absence of a comprehensive scheme for site G22.1, the public benefits of the scheme outweigh the harm caused to the character of the Conservation Area caused by the loss of the existing cottages, contrary to paragraph 134 of the NPPF and policy CS12.
3. The site forms part of a wider Local Plan housing allocation, G22.1, and as such should provide affordable housing in accordance with proposed policy DM8 and Core Strategy policy CS09. No such provision has been made as part of this proposal and the proposal is therefore contrary to the provisions of proposed policy DM8 and to Core Strategy policy CS09.

1.6 An application is now submitted addressing the reasons for the refusal of the previous one. It now includes a hybrid application relating to the site of Albemar with Rose Cottages and the development of the rest of the allocated site to the west.

1.7 The intention with the hybrid application is to provide a co-ordinated approach to the development of the site allocated for residential development in the Borough Council's *Site Allocations and Development Management Policies: Pre- Submission Document (January 2015)*. The outline element of the application demonstrates how the total site may be developed and the full application shows how buildings of local distinctiveness will help to secure a development appropriate to the locality. The proposal helps to achieve the Borough Council's aspiration for the site, taking account of the pre-application advice and the reasons for the refusal of the previous planning application.

1.8 The full application area is within the Castle Acre Conservation Area. As mentioned above, it forms the eastern part of a larger site, allocated in the emerging Local Development Framework document for future development across the Borough to 2026. Policy G22.1 sets out the policy intentions for the whole site and the hybrid application is made with this in mind.

**Policy G22.1 Castle Acre - Land west of Massingham Road, Castle Acre**



- 1.9 Land amounting to 1.1 hectares to the west of Massingham Road, as shown on the Policies Map, is allocated for residential development of 15 dwellings. Development will be subject to compliance with all of the following:
1. Submission of a Heritage Asset Statement that establishes that development would enhance and preserve the setting of the Conservation Area and the setting of the adjacent Grade II Listed Building.
  2. The design and layout of the development, and in particular its massing and materials, shall preserve and enhance Castle Acre Conservation Area;
  3. Submission of details showing how sustainable drainage measures will integrate with the design of the development and how the drainage system will contribute to the amenity and biodiversity of the development. A suitable plan for the future management and maintenance of the SUDS should be included with the submission;
  4. In order to achieve development that preserves and enhances the character of this part of the village, the Council requires a coordinated scheme on the entire site and the incorporation of a significant landscaping belt along the northern and western site boundaries to soften any impact of development on the wider landscape. Details of this shall be agreed by the LPA prior to use of the land taking place;
  5. Development is subject to the demonstration of safe highway access and provision of appropriate footway improvements that meet the satisfaction of the local highway authority;
  6. Provision of affordable housing in line with the current standards.
- 1.10 The National Planning Policy Framework (NPPF) places sustainability at the centre of planning policy, as a 'golden thread' running through both plan-making and decision-taking<sup>1</sup>, and establishes a presumption in favour of sustainable development in the planning system.
- 1.11 The NPPF also seeks to protect the historic environment and heritage assets. A Heritage Statement has been submitted supporting this application and explaining the effect of the proposal on the significance of Castle Acre Conservation Area and the setting of Stone Barn, a grade II listed building, situated on the opposite side of Massingham Road. This accords with requirement no. 1 of policy G22.1.

---

<sup>1</sup> NPPF p.4

## **2.0 USE**

- 2.1 The area which forms the detailed application is currently residential. Rose Cottages and Albemar are dwellings which have been unoccupied for some time and are in a poor state, detracting visually from the appearance of the Conservation Area. The garden land to the rear is unkempt and adds to the eyesore. The Heritage Statement concludes that these buildings are of some limited significance, which is historical rather than architectural. Although the harm caused by their demolition is less than substantial, the public benefit of the development of the allocation site, in a co-ordinated manner and the removal of a detracting eyesore, outweighs the harm caused. The Heritage Statement concludes that the proposed development is in accordance with the guidance contained in the NPPF (paragraph 134).
- 2.2 The area of the detailed application is surrounded by residential properties, mostly a mix of detached and semi-detached houses. The proposed residential use is appropriate for the site, which is allocated for such a use.
- 2.3 The area of the outline application lies to the west of Rose Cottages, Albemar and their garden land and is part of a larger arable field with boundary hedges.

## **3.0 AMOUNT**

- 3.1 Four detached four bedroom dwellings with garages are proposed within the detailed application with associated access, landscaping and infrastructure. These replace Rose Cottages, a pair of two bedroom dwellings and Albemar, which is a three bedroom house. The outline application proposes an additional 11 dwellings on the remainder of the allocated site, which in total covers 1.1 hectares.
- 3.2 The outline application demonstrates how the remainder of the allocation site can be developed, with all matters reserved, apart from access, for the erection of up to eleven dwellings, all on land to the west of Massingham Road, Castle Acre.

#### **4.0 LAYOUT, SCALE & APPEARANCE**

- 4.1 The outline application area shows how that part of the site can be developed from the new proposed access road. The area of the detailed application shows linear development along Massingham Road, set behind a proposed flint wall which follows the sight lines required by the new access.
- 4.2 The proposed layout is influenced by the grade II listed Stone Barn to the north east and the positioning of the access road to service the outline application. Both Rose Cottages and Albemar are elevated in terms of the street scene and Rose Cottages creates a pinch point in Massingham Road on the approach to the village. The removal of the existing buildings allows the opportunity to provide a safe footway as required by the Highways Authority, backed by a strong flint faced wall with the new dwellings set further back and lower than the road level to accommodate the natural fall in the ground levels to the south and west. This frontage layout will provide a softer visual approach on entering the village and removes the distraction to the Stone Barn currently provided by the derelict cottages. The access to the outline application area is positioned close to the northern boundary which provides a clear open space immediately in front of Stone Barn which will maintain the views currently enjoyed.
- 4.3 The proposed development envisages the creation of a group of buildings in traditional materials of flint, red brick and clay pantile. The style of development closely reflects the character of the locality and follows the advice of the Borough Council's Conservation Areas Advisory Panel. The selection of materials and style of construction seeks to echo those found on existing flint faced properties and boundary walls adjacent to the site thus reinforcing the local distinctiveness of the area, whilst mitigating any harm caused to heritage assets.
- 4.4 The proposed site layout shows unit 1 in the form of a traditional farmhouse with deep sliding sash, timber windows and a lean-to side projection. It is sited at the southern end of the site, furthest away from the grade II listed Stone Barn. It has an overall footprint of 131m<sup>2</sup> with 211m<sup>2</sup> internal floorspace and 21m<sup>2</sup> garage area. The main eaves is 4.9m with a ridge height of 9.3m and the garage eaves is 2.4m with a ridge height of 5.7m.
- 4.5 Unit 2 is in the form of a pair of traditional cottages, again facing the road. This dwelling has an overall footprint of 96m<sup>2</sup> with 164m<sup>2</sup> internal floorspace and 21m<sup>2</sup> garage area. The main eaves is 4.9m with a ridge height of 8.2m and the garage eaves is 2.4m with a ridge height of 5.8m. Units 1 and 2 have separate garaging behind the proposed roadside flint wall. External joinery will be in timber.



- 4.6 Units 3 and 4 are in the form of farm buildings. Unit 3 is designed as a main barn with a lean-to addition to the east, covered by the continuation of the main roof slope. It has an overall footprint of 143m<sup>2</sup> with 205m<sup>2</sup> internal floorspace and 29m<sup>2</sup> garage area. The main eaves is at 5.2m with a ridge height of 8.7m and the garage eaves is 2.35m. Again timber windows and doors are proposed.
- 4.7 Unit 4, which is at the north end of the site, closest to the Stone Barn, is designed as a 1<sup>3</sup>/<sub>4</sub> height barn outbuilding with its lower section nearest the Stone Barn. It has an overall footprint of 160m<sup>2</sup> with 233m<sup>2</sup> internal floorspace and 34m<sup>2</sup> garage area. The main eaves is 4.2m with a ridge height of 7.4m and the garage eaves is 2.3m with a ridge height of 4.15m.
- 4.8 Access to the western part of the site (the area covered by the outline application) is via a new road opening off the northern end of the Massingham Road frontage. A new Type 3 access-road is shown, with a 10m-radius bell-mouth, and visibility in excess of the minimum required 2.4m x 59m splays. The new 1.8m-wide footpath in front of the four new dwellings on Massingham Road continues north and then turns into the 'outline' site on the south side of the new access-road. A 1.5m wide footpath on the north side of the new road starts at the tangent of the bell-mouth. The location and configuration of this new site-access is the only aspect of the 'outline' application for which detailed approval is sought. (The detailed layout is shown on the engineer Plandescil's drawing number 20028/002). An Illustrative Plan for the remainder of the site is submitted. It shows 11 new homes plus associated roads and public open space, and has been used to develop initial drainage proposals (see 4.11 below).
- 4.9 Locating the new junction at the extreme north end of the site places it beyond the listed buildings on the opposite side of the road, minimising its impact on the Heritage Asset. Room is left for a pair of semi-detached houses fronting onto Massingham Road south of the new site-access. These two new units are shown following the general building-line of the four new homes on the 'detailed' site, and it is anticipated that their floor slab would be set at a similar level. A future detailed application would determine the massing and appearance of these two houses, but they would respond positively yet sympathetically to their immediate context, including the listed building.
- 4.10 The new 4.8m-wide access-road leads westward into the site, with a 1.5m footpath on the north side. The southern footpath narrows from 1.8m to 1.5m as it heads into the site. In the Illustrative Plan the view from Massingham Road into the 'outline' site is terminated by two new homes. Their main elevation is positioned obliquely across this key vista, leading the eye south towards the heart of the new development, a 600sqm Public Open Space enjoying views out over the shallow valley to west. On the east side of the new road as it swings to the south is a run of detached and semi-detached

new homes, arranged facing the street to provide good levels of natural surveillance to the footpath and Public Open Space. The building line is shown as 'relaxed' but broadly regular, with garages set back to avoid cars dominating the street-scene.

- 4.11 As stipulated in the allocation policy text, a preliminary Sustainable Urban Drainage scheme (SUDS) has been designed by project engineers Plandescil. This is based on restricting peak rainwater run-off to its current 'green-field' rate, by storing peak-load storm-water in attenuation tanks under the public open space. The Illustrative Plan also shows a new pumping-station in the south-west corner of the 'outline' site, serving all 15 units proposed in the hybrid application. For more information on drainage see Plandescil's Flood Risk Assessment and Preliminary Drainage Strategy submitted separately.

## **5.0 LANDSCAPING**

- 5.1 Hard landscaping is proposed to the dwellings fronting Massingham Road, sited behind a new flint wall.
- 5.2 Long views of the outline application area from the northern end of Massingham Road and looking south from West Acre Road are significant. Policy G22.1 requires the incorporation of a significant landscaping belt along the northern and western site boundaries to soften any impact of development on the wider landscape.
- 5.3 The Illustrative Plan includes a generous margin for screen-planting on the northern and western site-boundaries of the 'outline' site. This is generally shown densely planted with trees, but these are thinned out adjacent to the Public Open Space to allow some views out to the west. A second broken line of trees on the east side of the Public Open Space, adjacent to the access-road, ensures that the screening is largely complete in the long views towards the site from the west. Further dense tree-planting is suggested around and behind the pumping station, screening it from adjacent new and existing properties.

## **6.0 ACCESS**

6.1 The proposal has been prepared following the advice of Graham Worsfold, Assistant Engineer Estate Development, who stated in an e-mail dated the 17<sup>th</sup> February 2015 that,

“In principle the Highway Authority have no objection to the proposals and I have the following comments:

1. Massingham Road will need to be widened along the site frontage in order to provide a carriageway of at least 4.8m.
2. The existing footway should be extended across the whole site frontage.
3. In the absence of evidence to suggest otherwise sightlines of 2.4m x 59m would be required at the junction of the access road with Massingham Road.
4. Developments comprising 9-25 dwellings can be served via a shared surface type 5 or type 6 road.
5. Where houses are proposed either side of a type 3 road I would expect a footway to be provided to both sides of the carriageway.
6. Size 3 turning heads are required at the end of the proposed estate road.
7. Private drives should have at least size 5 turning heads.
8. Parking should be provided in accordance with current guidance i.e. 1 for 1 bed unit, 2 for 2 or 3 bed unit & 3 for 4 bed unit.
9. The four houses south of the main junction should take vehicular access direct from Massingham Road.
10. Areas of verge should be at least 1m wide.

6.2 The application has been made following this advice. Also, the number of garages, private and parking spaces shown meet the minimum standards required by the Highways Authority.

## **7.0 CONCLUSION**

7.1 The application site has been developed in conjunction with the requirements set out in Policy G22.1. It is considered that the design and layout of the development, in particular the massing and materials, shall preserve and enhance the Castle Acre Conservation Area, providing an attractive and sustainable development which will contribute positively to the Council's housing supply.

## **APPENDIX 3 – HERITAGE STATEMENT**

**JOHN SELBY** BA MSc IHBC  
CONSERVATION & PLANNING

## **Heritage Statement**

**Land west of  
Massingham Road  
Castle Acre  
Norfolk  
PE32 2BG**

**28<sup>th</sup> May 2015**

**Heritage Statement**

Land west of Massingham Road, Castle Acre

<b>Contents</b>	<b>Page</b>
<b>1.0 INTRODUCTION &amp; PLANNING HISTORY</b>	<b>3</b>
<b>2.0 PLANNING POLICIES</b>	<b>5</b>
<b>3.0 HERITAGE ASSETS</b>	<b>7</b>
<b>4.0 HISTORICAL DEVELOPMENT</b>	<b>8</b>
<b>5.0 SIGNIFICANCE</b>	<b>14</b>
<b>6.0 HERITAGE IMPACT ASSESSMENT</b>	<b>16</b>
Impact on character of the conservation area	<b>16</b>
Impact on the setting of designated heritage assets	<b>17</b>
Harm & Public Benefit	<b>18</b>
<b>7.0 CONCLUSION</b>	<b>19</b>
<b>REFERENCES</b>	<b>20</b>

(Photographs taken by the author on the 9<sup>th</sup> December 2013 unless otherwise stated).

## 1.0 INTRODUCTION & PLANNING HISTORY

- 1.1 This Heritage Statement has been written to support a hybrid planning application for detailed planning permission for the demolition of Rose Cottages and 'Albemar' and the erection of four dwellings, with associated access, landscaping and infrastructure and an outline planning application with all matters reserved, apart from access, for the erection of up to eleven dwellings, all on land to the west of Massingham Road, Castle Acre. The National Planning Policy Framework (NPPF) requires an applicant to describe the significance of any heritage assets affected by the proposal, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance (paragraph 128).
- 1.2 This Statement provides an appraisal of the heritage asset and assesses significance in accordance with the policies contained in the NPPF. The impact of the proposed works on the significance of the heritage asset is then described and considered.
- 1.3 The site lies at the northern most part of Castle Acre village on the west side of Massingham Road. The part of the site, which forms the full planning application, is occupied by a pair of derelict cottages (Rose Cottages) sited at the back of the verge, very close to the highway. It also includes the house known as Albemar, which is gable-onto and sited very close to the highway. Further south of Albemar, and beyond the site boundary, lies an estate of twentieth century dwellings, the majority of which are semi-detached. The level of the site drops westwards away from Massingham Road considerably with a gentler slope southerly along the western boundary back towards the village. The application site retains established native hedging and the land beyond these boundaries to the west is open countryside. To the east on the opposite side of the road, is the grade II listed 'Stone Barn' and associated flint roadside walls. The barn has been converted to residential use with further recent development behind.
- 1.4 An application for planning permission for the demolition of Rose Cottages and the erection of four dwellings with garages and access was submitted in 2014 (ref. 14/00148/F). This was withdrawn in April 2014 and a revised scheme submitted, again proposing four dwellings following the demolition of Rose Cottages (ref. 14/01181/F). The design of the resubmitted scheme for four dwellings reflected a farmyard and was developed following extensive pre-application discussion with planning and conservation officers and incorporated the views of the Council's Conservation Areas Advisory Panel.
- 1.5 The site comprised Rose Cottages and their garden land, but again did not include the site of Albemar to the south. This land now forms part of a larger site, which besides Rose Cottages and Albemar, includes land to the west,

identified in the emerging Local Development Framework as suitable for residential use for fifteen dwellings (policy G22.1)<sup>1</sup>.

1.6 The revised application (14/01181/F) was refused on the 3<sup>rd</sup> December 2014 for the following reasons:

1. The proposal fails to deliver a comprehensive development of site G22.1 as required by proposed policy G22.1 and therefore fails to fully take account of the opportunities available for improving the character and quality of the area as required by paragraph 64 of the NPPF.
2. Given the concerns expressed by English Heritage and the harm they have identified, it is not considered that, in the absence of a comprehensive scheme for site G22.1, the public benefits of the scheme outweigh the harm caused to the character of the Conservation Area caused by the loss of the existing cottages, contrary to paragraph 134 of the NPPF and policy CS12.
3. The site forms part of a wider Local Plan housing allocation, G22.1, and as such should provide affordable housing in accordance with proposed policy DM8 and Core Strategy policy CS09. No such provision has been made as part of this proposal and the proposal is therefore contrary to the provisions of proposed policy DM8 and to Core Strategy policy CS09.

1.7 An application is now submitted addressing the reasons for the refusal of the previous one. It now includes a hybrid application relating to the site of Albemar with Rose Cottages and the development of the rest of the allocated site to the west.

1.8 The form of the proposed development still reflects a group of farm buildings (stables, barn, cottages and farmhouse), but arranged along the side of Massingham Road with a new road to the north of the site, providing access to the remainder of the allocated land to the west, which forms the outline application area.

---

<sup>1</sup> Site Allocations and Development Management Policies: Pre-Submission Document (January 1025)



## **2.0 PLANNING POLICY & GUIDANCE**

- 2.1 The Planning (Listed Buildings and Conservation Areas) Act 1990 states that in considering applications for development which affects a heritage asset or its setting, local planning authorities shall have special regard to the desirability of preserving the building or its setting (paragraph 66.1). Special attention shall also be paid to the desirability of preserving or enhancing the character or appearance of a conservation area in the exercise of any powers under the planning Acts (paragraph 72).
- 2.2 The NPPF expands on the 1990 Act. It identifies protection and enhancement of the historic environment as an important element of sustainable development and establishes a presumption in favour of sustainable development in the planning system (paragraphs 6, 7 and 14). The NPPF also states that the significance of listed buildings and conservation areas can be harmed or lost by alteration to them or by development in their setting (paragraph 132) and that the conservation of heritage assets is a core principle of the planning system (paragraph 17). Furthermore, paragraph 137 states that proposals which preserve those elements of the setting that make a positive contribution to, or better reveal the significance of the heritage assets should be treated favourably.
- 2.3 The policies of the NPPF relevant to this proposal are as follows:
- Paragraph 128. “In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance.”
  - Paragraph 129. “Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset’s conservation and any aspect of the proposal.”
  - Paragraph 134. “Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use”.

- Paragraph 137. “Local planning authorities should look for opportunities for new development within Conservation Areas...and within the setting of heritage assets to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably.”
  - Paragraph 61, “Although visual appearance and the architecture of individual buildings are very important factors, securing high quality and inclusive design goes beyond aesthetic considerations. Therefore, planning policies and decisions should address the connections between people and places and the integration of new development into the natural, built and historic environment”.
- 2.2 The Borough Council’s LDF Core Strategy supports these aims and seeks to promote design in keeping with the locality, whilst protecting the character of conservation areas and the setting of listed buildings.
- 2.3 Castle Acre is designated a Key Rural Service Centre in the Borough Council’s Core Strategy, “identified as having potential to accommodate growth to sustain the wider rural community”. In the Preferred Options for a Detailed Policies and Sites Plan, (which closed for public consultation in October 2013), some 0.46 hectares of land to the west of Massingham Road, Castle Acre was allocated for residential development. The Site Allocations and Development Management Policies: Pre-Submission Document (January 2015) confirms the allocation under policy G22.1.
- 2.4 The detailed application area forms a part of this draft allocation and the outline application covers the remainder.



The application site from the north  
(Photograph supplied by P. Grange)

### 3.0 THE HERITAGE ASSETS

- 3.1 The site lies within Castle Acre Conservation Area, which was designated in 1971. In 1990, the Conservation Area was extended to embrace the area of St James's Green, including the area occupied by Rose Cottages and Albemar. The revised Conservation Area Character Statement was published in 2009. Rose Cottages, which form part of the application site, are identified in the Character Statement as being of local interest. Albemar, lying south of Rose Cottages, is not identified as a building of local interest. Neither building is listed. Across the road (east) of the application site is the Stone Barn, which is a grade II listed building.
- 3.2 St James's Green, which is to the east of the application site, is the location of a medieval market in existence since the time of Edward I.<sup>2</sup> Its full extent is not known. Edwin Rose suggests that the name suggests that it may have been under the control of the parish church, some distance away within the town earthworks. There are two additional listed buildings in St James's Green, but they are distant from the application site and their setting is unaffected by the proposal.
- 3.3 Further south of the application site are the remains of the castle and the Cluniac priory, both scheduled ancient monuments and grade I listed ruins. The 'planned town' of Castle Acre is of high archaeological significance. The application site lies to the north of the village, well away from the principal archaeological areas and the town earthworks. Massingham Road forms part of the ancient Peddars Way track which runs to the Norfolk coast at Holme-next-the-Sea. The application site is on the west side of the track.
- 3.4 Thus the designated heritage assets affected by the proposal are the conservation area and the Stone Barn. Rose Cottages comprise a non-designated heritage asset, identified in the Conservation Area Character Statement as being of local interest.



The Stone Barn with Rose Cottages to the right and the view from St James's Green (right) with Rose Cottages centre left.

<sup>2</sup> Edwin Rose notes September 2005 in NHER 32918

## 4.0 HISTORICAL DEVELOPMENT

### Rose Cottages

- 4.1 Rose Cottages are built of brick and have an asymmetrical pantile roof. The cottages have been extended and fitted with modern windows and plastic doors and the brickwork has been painted white.
- 4.2 They probably date from the early nineteenth century at a time when Castle Acre experienced a rapid population growth, which had reached 1,567 in 1851, representing a 74% increase in less than forty years.<sup>3</sup> During the nineteenth century Castle Acre was notorious for being an 'open village', where rapacious landlords crammed people into poorly built lodgings, as opposed to 'closed villages' where a single landlord could exercise more control. Sarah Spooner writing the 'parish notes' for Castle Acre states, "The controversial gang system of labour originated in villages like Castle Acre, which provoked moral outrage on behalf of the poor by the middle and upper classes. A curate living in Castle Acre in the mid-nineteenth century remarked that conditions in the village 'exceeds anything of which I have had experience in the moral degradation of its poor. I have been to Sierra Leone, but I have seen shameless wickedness in Castle Acre such as I have never witnessed in Africa.'"<sup>4</sup>
- 4.3 It was during this time that Rose Cottages were built probably to house agricultural labourers and their families, in the form of a pair of dwellings with gable end chimney stacks. The cottages were built of a local soft red brick. They appear on the 1840 parish Tithe Map.



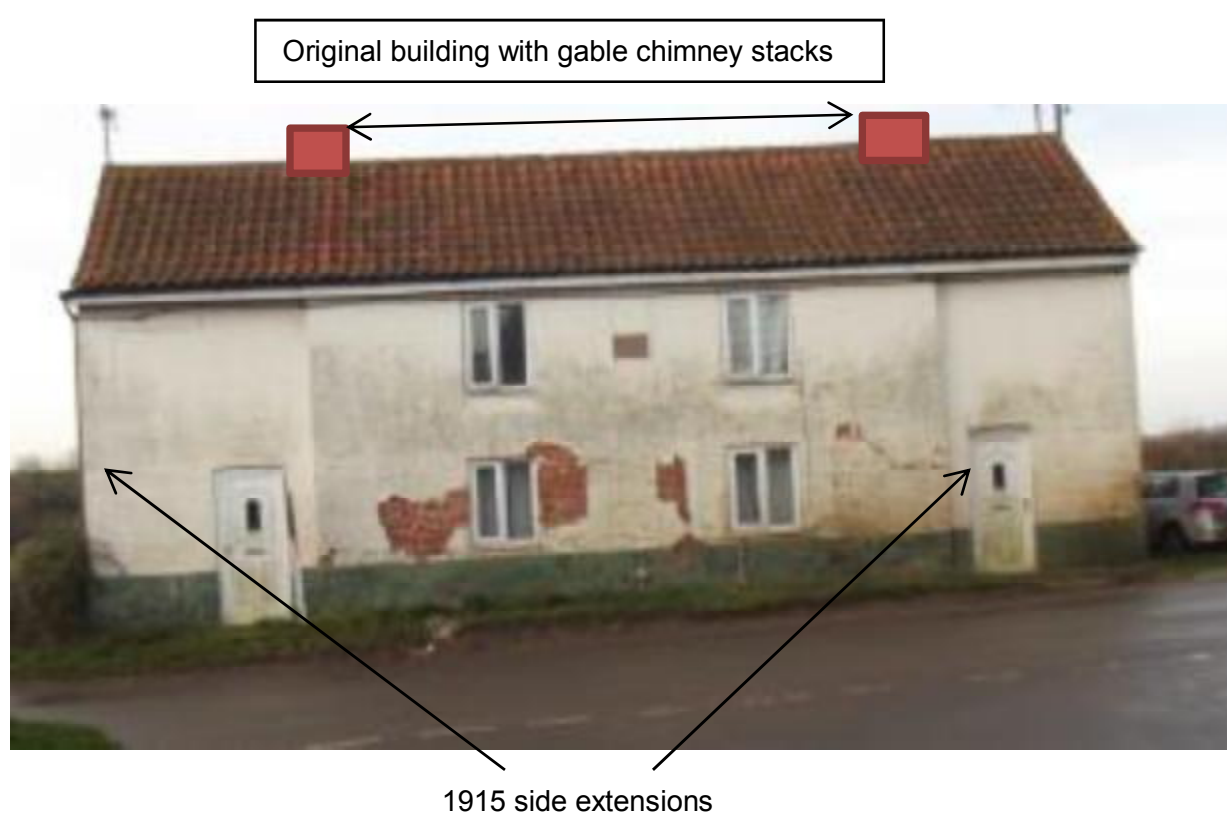
Tithe Map 1840

<sup>3</sup> Garry 2009

<sup>4</sup> NCC NHER Castle Acre Parish Notes



- 4.4 In 1915, the cottages were 'renovated' and a plaque recording the event is positioned on the front elevation, with the initials 'JF'. The renovation may have been necessary to upgrade fairly squalid accommodation. At that time each cottage comprised one living room on the ground floor and one above with a rear outshut. The renovation involved creating second rooms on both ground and first floor at each end of the building. So the accommodation comprised a kitchen and a living room on the ground floor and stairs leading to two upstairs bedrooms and a box room with all principal rooms having fireplaces. Original fireplaces were replaced and the stacks were remodelled.



- 4.5 Some fifty years or so later, a further 'renovation' included the provision of a bathroom and rear lean-to extensions to provide more up to date kitchens with hot and cold water. These date from around 1950 and were built of common brick. The row of privies and coal sheds, located against the roadside wall to the north, which served the cottages were allowed to fall into disrepair and have now largely disappeared.



Remains of privies behind roadside wall

- 4.6 No original internal features appear to have survived the two phases of renovation and fireplaces, for example, have either been removed or replaced with mid-twentieth century types.

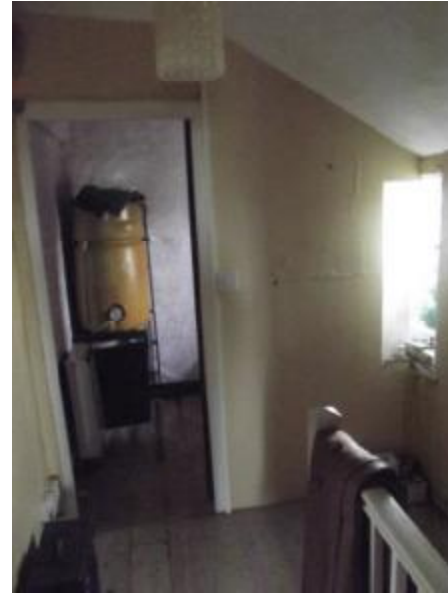


Mid twentieth century rear lean-to extensions (Photograph supplied by P. Grange)



Interior of north cottage: top left sitting room or parlour in original building with mid C20 fireplace. Top right hall and front door in 1915 extension  
Bottom left living-room/kitchen with fireplace range removed. Bottom right upstairs box room





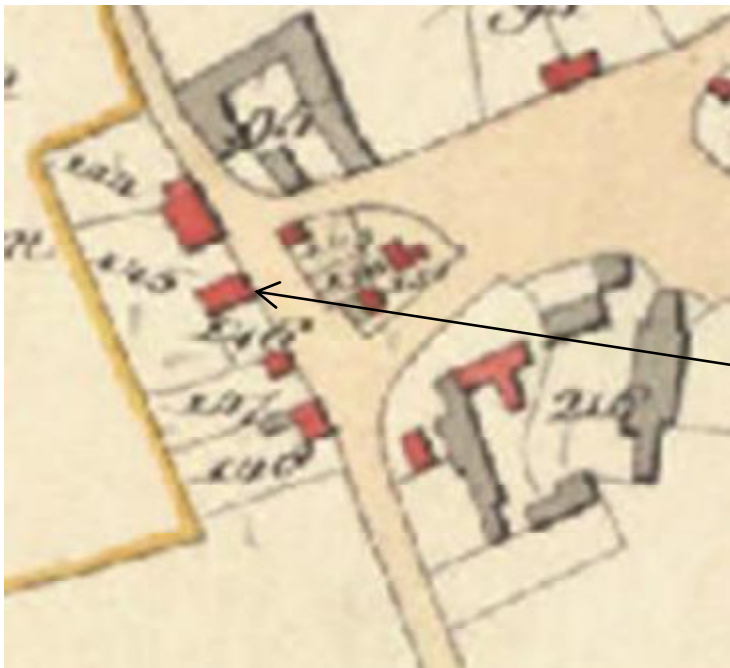
Interior of north cottage bedrooms showing removed fireplaces



Interior of south cottage: Living-room (left) with replacement fireplace and bedroom (right) with fireplace removed

## Albemar

- 4.7 Albemar probably pre-dates Rose Cottages. It appears on the 1840 tithe map gable end onto Massingham Road. The form of the property appears to have changed little from that shown on the 1905 Ordnance Survey map.



1840 Tithe Map



1905 OS Map





- 4.8 Yet it retains inside the remains of a ground floor eighteenth century fireplace on the east side of the house, and an exposed floor frame with axial beam, possibly of similar date.



- 4.9 To the north of this ground floor living room is a smaller room containing a small cast iron fireplace and bread oven, probably of mid nineteenth century date. The upper part of its stack has been removed.



Fireplace and bread oven

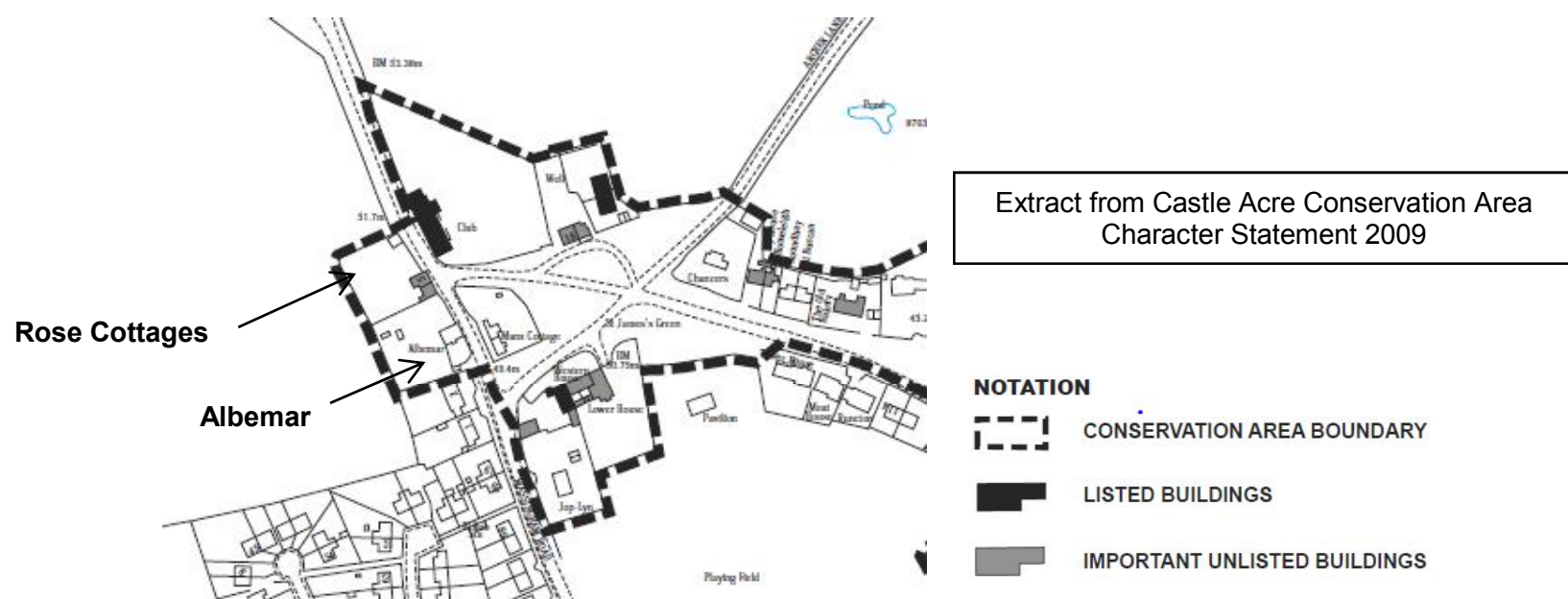
Rear kitchen

Stairs

- 4.10 The building seems to have undergone alterations possibly around the same time as Rose Cottages and a rear kitchen has been added with a west gable chimney stack. This in turn has been modified in the twentieth century, when the staircase was replaced. Elsewhere no internal features of interest have survived. In common with Rose Cottages, Albemar is in a poor condition.

## 5.0 SIGNIFICANCE

- 5.1 Significance may be assessed on a scale from very high to none depending on the values society places on a particular historic asset. English Heritage considers that these values may be 'evidential' (from past activities or remains), historical, aesthetic, communal (commemorative or symbolic, cultural, social or spiritual) or natural<sup>5</sup>. In assessing significance, the importance of the setting of the heritage asset should also be considered.
- 5.2 The designated heritage assets are of high significance; these include Castle Acre Conservation Area and the grade II listed Stone Barn. The impact of the proposal on the character of the Conservation Area and the setting of the listed building needs to be assessed. This is done in section 6 below.
- 5.3 Rose Cottages are described in the Conservation Area Character Statement as an 'Important Unlisted Building', unlike the adjacent 'Albemar' which is not. Some 173 of these buildings are identified in the Statement. "These important unlisted buildings have been identified because of their prominent position, use of traditional materials, their character is substantially intact and often because they relate to other historic buildings close by."<sup>6</sup> No specific reason for designating Rose Cottages as an important unlisted building is given. The building is prominent and close to Stone Barn, but has been substantially rebuilt and extended in the twentieth century and its character is no longer intact. The resulting mix of different brick has been masked by white paint. Though prominent, Rose Cottages no longer make a positive contribution to the Conservation Area; rather it detracts.



<sup>5</sup> English Heritage 2008 pp. 27-40

<sup>6</sup> Character Statement p.12

- 5.4 Unlike Albemar, Rose Cottages are considered to have some significance, which is probably historical rather than architectural and concerns their prominence. The Conservation Area boundary was redrawn in 1990 with the specific intention of including the cottages and the adjacent Albemar house with their gardens. This is the only land on the east side of Massingham Road included in the Conservation Area and was probably done so to control the form and design of future development, to ensure that it would be in keeping, and would enhance the Conservation Area, whilst protecting the setting of the Stone Barn. The significance of Rose Cottages and Albemar should be viewed in that context. They have some limited historic interest, but are much altered and in poor condition. They occupy a significant location on land identified to be suitable for residential development. The remainder of the allocated land, which forms the area of the outline application, lies outside the Conservation Area boundary and whilst long views of it from Massingham and West Acre Roads remain significant, this part of the allocated site slopes away from the Conservation Area and has little impact on it.
- 5.5 Rose Cottages and Albemar are located along the Peddars Way Roman road and face St James's Green, which is a common edge settlement outside the mediaeval town of Castle Acre. Such settlements have local significance and usually date from the eleventh to twelfth centuries. The extent of the original St James's Green is not known and the application site could have potential for buried archaeological remains, the significance of which may be affected.



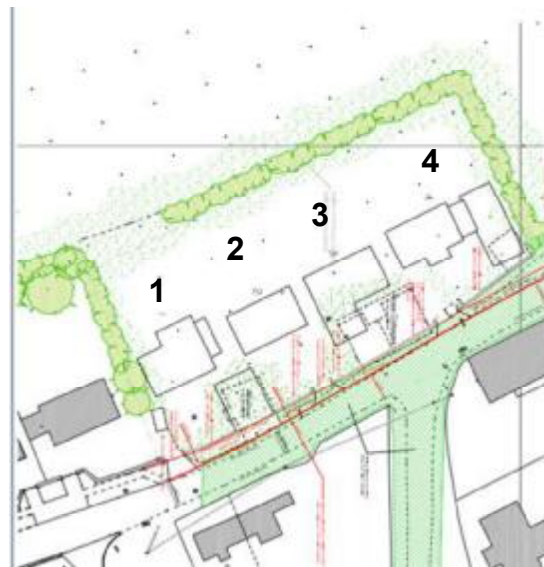
Rose Cottages (left) and the Stone Barn viewed from the south and right the overgrown rear garden to the west with open countryside beyond and Albemar to the right



## 6.0 HERITAGE IMPACT ASSESSMENT

### Impact on the Character of the Conservation Area

- 6.1 Currently, the site comprises three run-down roadside cottages set in an unkempt and overgrown garden with partially collapsed outbuildings. The site is an eyesore and given its prominence, adversely affects the character of the Conservation Area. The cottages are prominent, but have historical rather than architectural significance. Provided their history is recorded, as it is here, their removal and replacement would not harm the character and appearance of the Conservation Area.
- 6.2 The proposed development envisages the creation of a group of buildings in traditional materials of flint, red brick and clay pantile. The style of development closely reflects the character of the locality and follows the advice of the CAAP. Further details are supplied in the Design & Access Statement and drawings accompanying the application. The proposed site layout shows unit 1 in the form of a farmhouse. Unit 2 is in the form of traditional cottages, facing the road, whilst units 3 and 4 are in the form of farm buildings.



- 6.3 The proposed dwellings are set back to enable improved highway visibility, but the 'hard edge' to the road which the existing cottages provide, is maintained by the provision of a flint wall, extending the existing roadside wall sited opposite the Stone Barn.
- 6.4 The existing cottages have limited visual merit and though they could be renovated, the extent of alteration required and the level of rebuilding would result in their near replacement with little benefit resulting. The plaque dating the 1915 renovation of Rose Cottages, which substantially changed their appearance and removed any internal features of merit, could be salvaged and incorporated into the proposed new roadside wall, retaining reference to the cottages. Both Rose Cottages and Albemar have now been fully recorded in this Heritage Statement. The replacement of the cottages would result in an enhancement of the Conservation Area.

- 6.5 The site of the outline application, which covers the remainder of the residential allocation, is situated west of the gardens to Rose Cottages and Albemar. It abuts the Conservation Area boundary. Its development will have no impact on the character and appearance of the Conservation Area. Long views of the site from the northern end of Massingham Road and looking south from West Acre Road are of greater significance. The subsequent detailed application will be designed to take regard of this and will be influenced by the style of development proposed along the Massingham Road frontage.



### Impact on the Setting of Designated Heritage Assets

- 6.6 The Stone Barn heralds the arrival into Castle Acre from Great Massingham and occupies a prominent roadside position. The barn is associated with buildings on St James's Green from where its yard is entered. Its setting on Massingham Road is not enhanced by the much altered cottages and the unkempt land which surrounds them, including the partially collapsed roadside wall and privy buildings.



- 
- 6.7 The proposed housing will complement and not visually compete with the Stone Barn. The new buildings are sufficiently distant and substantially lower than the barn and will improve its setting when viewed from both directions along the road. The design of the proposed scheme in the form of vernacular buildings will complement the setting of the Stone Barn. The provision of a new roadside wall will retain the hard edge, reflecting the boundary walls to the barn yard across the road. The removal of the scruffy pair of cottages can only amount to a significant improvement to the barn's setting, as it does to the appearance of the Conservation Area. Their relationship to the barn is a detraction and their replacement, built as a traditional farm group, using locally appropriate materials, will enhance the setting.
- 6.8 The proposed development of the outline application site has no impact whatsoever on the Stone Barn.

### **Harm and Public Benefit**

- 6.9 The demolition of Rose Cottages and Albemar will have an impact on the present appearance of the Conservation Area. The former is considered to make a positive contribution to the character despite its parlous condition and substantial rebuilding in the twentieth century. Demolition will result in harm to the significance of a designated heritage asset; in this case, the Castle Acre Conservation Area. The Borough Council has a statutory duty to preserve and enhance the character or appearance of designated conservation areas. The NPPF encourages new development in conservation areas which enhances or better reveals its significance. Proposals which make a positive contribution should be treated favourably.
- 6.10 The level of harm caused by the proposed demolition and development is (in terms of the NPPF) less than substantial. As a result, the application has to be weighed against the public benefits which may accrue.
- 6.11 In this case the development of the site is part of a comprehensive development of the Borough Council's housing allocation for Castle Acre. The hybrid application demonstrates how the total site may be developed and the full application component shows how buildings of local distinctiveness will help to secure a development appropriate to the locality. The proposal helps to achieve the aspiration expressed in the proposed policy G22.1, which in turn has the public benefit of meeting the Council's housing needs across the Borough.
- 6.12 The proposal results in change, but change is not necessarily harmful, particularly when the appearance of the public realm is visually improved; in this case by the development of an unsightly site which detracts from the character and appearance of the Conservation Area.

- 6.13 In refusing the previous application for part of the site, the Borough Council accepted that the existing buildings could be demolished if an acceptable, suitably designed replacement was proposed as part of a co-ordinated development of the entire 1.1 hectares allocation site. The hybrid application, does this and provides a proposed access, meeting County Highways requirements, to the north of Rose Cottages to ensure access to the entire allocated site.

## **7.0 CONCLUSION**

- 7.1 The proposal involves the demolition of Rose Cottages and Albemar, which have some historical significance, although not designated heritage assets. It proposed to build four new dwellings to replace them. This forms part of the housing allocation for the village identified by the Borough Council. An outline application is being made concurrently to develop the remainder of the site to the west with access off Massingham Road to highway standards.
- 7.2 The demolition causes less than substantial harm to the significance of the Conservation Area. This harm is outweighed by the public benefit of developing the proposed allocated land in a co-ordinated manner to meet the Borough Council's housing target.
- 7.3 The present proposal accords with the intent expressed in policy G22.1 and it provides a co-ordinated scheme, delivering a satisfactory development of the allocated site, sensitive to the significance of the designated heritage assets.
- 7.4 The hybrid application, now delivers a comprehensive development as required by the Borough Council, improving the character and appearance of the area. Harm is outweighed by the public benefit the development brings, satisfying paragraph 134 of the NPPF.

---

**REFERENCES**

Borough Council King's Lynn & West Norfolk	<i>Castle Acre Conservation Area: Character Statement</i>	Revised edition May 2009
Department of Communities & Local Government	<i>National Planning Policy Framework</i>	March 2012
Department of Communities & Local Government	<i>Historic Environment Planning Practice Guide (HEPPG).</i>	March 2010
English Heritage	<i>Conservation Principles: Policies and Guidance</i>	2008
Garry, Mary-Anne	<i>Castle Acre: A Social History</i>	Larks Press, Dereham 2009
Norfolk County Council	<i>Norfolk Historic Environment Record (NHER)</i>	From Norfolk Explorer website