

## 2.0 LEGISLATIVE AND STATUTORY CONSTRAINTS

2.1. There are no statutory designated heritage assets located within either sites F2.3 or F2.5.

2.2. Approximately 350m to the southeast of site F2.3 is Hunstanton Chapel (Chapel of St Andrew). This is a scheduled monument (OCN 223) and listed Grade II\* (1077919). The scheduling record is an old county number and was not reviewed under the Monuments Protection Programme. As such, there is no scheduling description available for this monument.

2.3. The chapel is also listed Grade II\* as the Chapel of St Andrew, Barret Ringstead, added to the list in June 1953. The list description reads as follows:

*Ruins of the Church of St. Andrew, 500 metres west of Barret Ringstead Farm- house. C13 and C14 evidence. Rubble chalk lump, stone dressings and quoins. Single-cell oblong plan, roofless. South side with featureless door opening, paired stone dressed double lancets C13, featureless large window opening. Walls to eaves level. East traceryless Decorated [sic] window with gable standing above it. One west gable opening, blank north side. Scheduled Ancient Monument, County Number 223.*

2.4. To the north of the application site is Smithdon Secondary School. This was Grade II\* listed in 1993. The list description reads as follows:

*HUNSTANTON KINGS LYNN ROAD TF 64 SE 213/1/10001 Smithdon School inc. main block, water tower, workshops and kitchens.*

*Secondary school. 1950-54. Alison and Peter Smithson. Painted steel frame with buff sandlime brick infill. Flat roof. Windows originally of steel, without subframes, but now many of these have been changed to timber. 2 storeys, with single storeyed workshops and kitchens to north. Compact, almost symmetrical rectangular plan around two courtyards, with central double-height hall spanning two main ranges. Classrooms fully glazed, with obscured panels below cill height. Ground floor of lower proportions than upper floor. Steel framed water tower with steel tanks, between main block and attached kitchen, and brick chimney adjacent. An important building with innovative steelwork designed on the plastic theory.*

2.5. The gymnasium is also listed Grade II\*:

*School gymnasium. 1950-54. Alison and Peter Smithson. Steel frame and buff sandlime brick infill; flat roof. Freestanding symmetrical block of one tall storey in height; upper part of wall delineated by horizontal division and of taller proportion than lower floor. Obscured solid panels to ends; long side of nine bays wide with end bays broader than those between and of solid brickwork, while central seven bays to upper part of wall are fully glazed. Later swimming pool attached is not of special interest. The gymnasium is an integral part of this important school.*

2.6. To the southwest of the application site is a brick water tower constructed in 1897 in a Neo-Romanesque style. This was listed Grade II in September 1984. The list description reads as follows:

*Watertower 1897. Brick. Rectangular on plan, 3 storeys. 3 bays. Neo- Romanesque. Ground floor battered plinth, first and second floor string courses. Arched door to east side with panel above. 2 recessed blank panels, 3 to other sides. First floor one arched headed opening window, 2 arched blank panels. Third floor 3 oculi with metal glazing bars to each face. 2 centre and 2 angle pilasters to each face. Elaborate parapet corbelled out with overlapping courses, machicolation like brackets, parapet divided with 3 panel battlements. This watertower is the only surviving one of 2 built for New Hunstanton.*

2.7. Listed buildings and their settings are protected via the provisions of section 66(1) of the Planning (Listed Building and Conservation Areas) Act 1990. This states that local planning authorities must pay special regard to the desirability of preserving listed buildings and their settings when exercising their planning functions.

2.8. A spur at the southern end of the Hunstanton Conservation Area is located to the northwest of the application site. Its setting is not considered to be affected by the proposals by virtue of the intervening development between it and the application site. There has not been any suggestion from Historic England that its significance would be affected by this development. It is not therefore considered further.

## 3.0 HISTORY OF THE SITE AND SURROUNDINGS

3.1. Occupation at Hunstanton goes back many years as part of wider prehistoric activity in this part of Norfolk. The Icknield Way passes through Ringstead nearby, and archaeological evidence has identified Bronze and Iron Age finds. Occupation continued through the Roman period, with a fort nearby at Brancaster and the Peddars Way passing to the east.

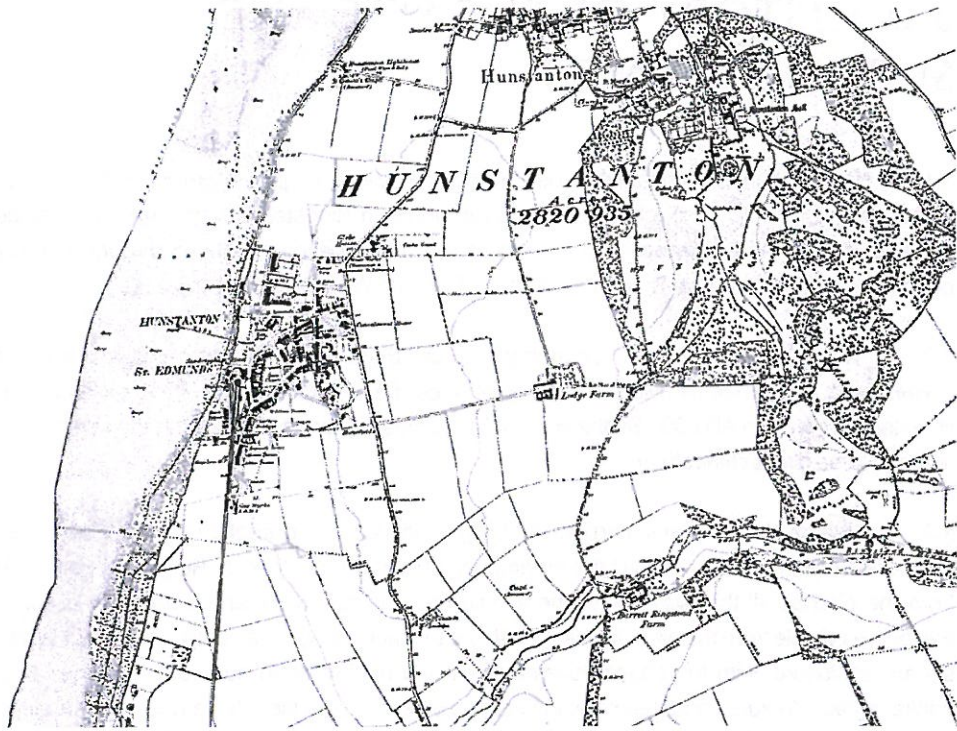
3.2. The name 'Hunstanton' comes from the Old English for Hunstan's village or homestead – *'Hunstan's tun'*. There is evidence nearby of Anglo Saxon occupation, with a settlement at Old Hunstanton dated to AD 500. By the time of the Domesday survey in the C11, the settlement was referred to as *'Hunestanestuna'*.

3.3. Little of Hunstanton's medieval buildings survive. One exception is the ruined Chapel of St Andrew which formerly served the community at Barret Ringstead or Ringstead Parva. Aside from the chapel, all that survives of the settlement are earthworks and cropmarks of medieval enclosures visible from the air. These suggest that the main village site comprised a double ditched square enclosure, with the chapel located within the northwestern quadrant. A series of other banks, sunken features and platforms indicate a settlement that included a possible manor house and central street. It is hypothesised that the village was abandoned after the plague outbreak of 1348-9 (Robertson, 2007). In 1809, the chapel was described as having been 'dilapidated many years' (Blomefield, 1809).

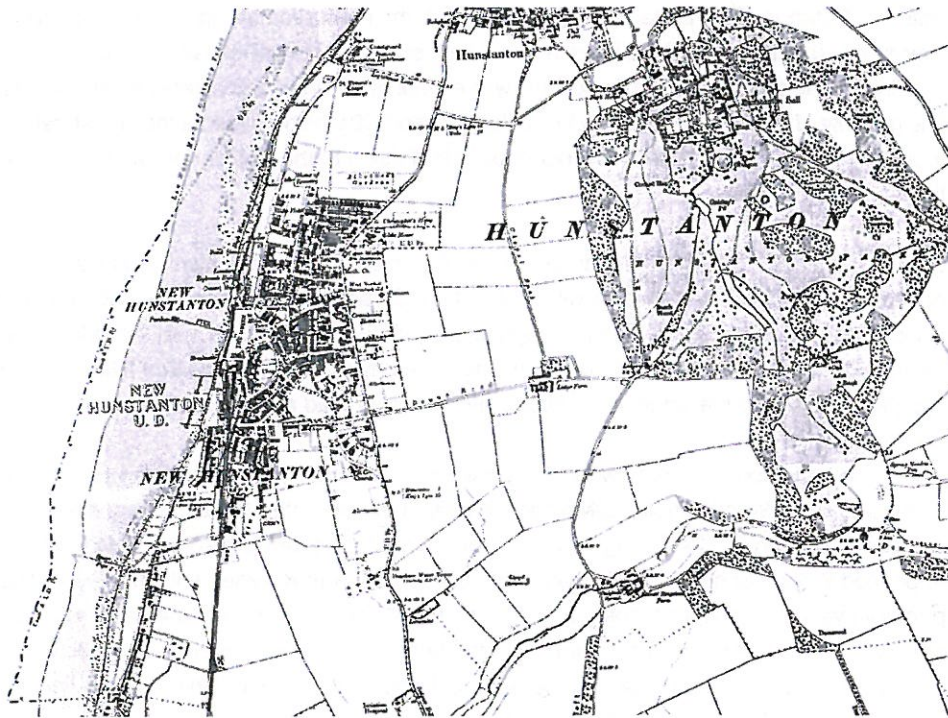
3.4. The manor of Hunstanton was granted to Ralph Fitzherluin, whose daughter married Roland L'Estange. This began a long dynasty, with the manor remaining in the Le Strange family ever since. The manor house is located to the east of Hunstanton at Hunstanton Hall. The current building on the site dates to C17 and later, with elements including the gatehouse as early as C15. The majority of the hall unfortunately burnt down in the C19 which initiated a major restoration, only to suffer a similar fate in 1951. This prompted the division of the hall into private apartments and their subsequent sale.

3.5. The 1890 1:10,560 Ordnance Survey (OS) plan shows the extent of Hunstanton Park, appearing as a well-treed feature within an otherwise agricultural landscape. 'Old' and 'New' Hunstanton are clearly shown as two geographically distinct settlements, with the older settlement located to the north adjoining Hunstanton Hall. The newer C19 settlement of 'New Hunstanton' stands separately to the south, located between the main road and the sea front.

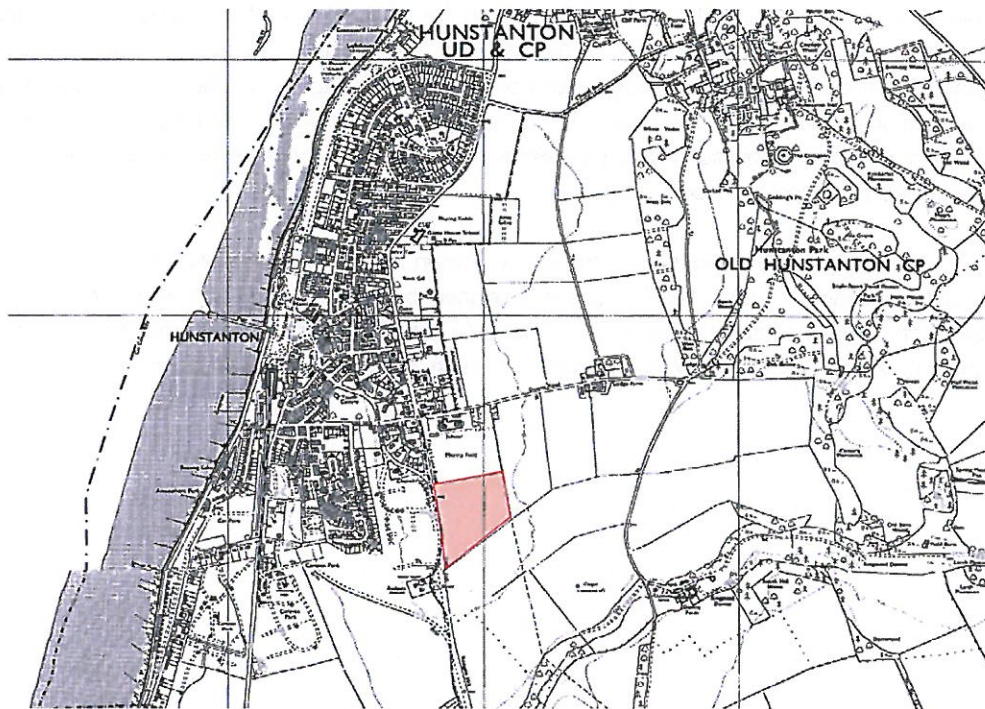
3.6. Hunstanton as it is now known grew up in the mid C19. It was the terminus of the Hunstanton and West Norfolk Railway which arrived in 1862 after the encouragement of Henry Styleman Le Strange. Le Strange's vision was to create a seaside resort to rival Brighton. He appointed William Butterfield to prepare a master plan for a new settlement. The layout that was prepared was based around open spaces, and the architectural style of the buildings looked to materials and construction as a forerunner of the Arts and Crafts movement that was to come later in the century. Just as the railway 'lifeline' arrived, Le Strange died suddenly, passing the estate to his son Hamon who oversaw its rapid expansion.



1890 1:10,560 OS plan



1929 1:10,560 OS plan



1971 1:10,000 OS plan  
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3.7. The second half of the C19 saw the growth of the seaside resort, complete with hotels, boarding houses, shops, private residences, gas works, bathing machines, and even a pier. At its heart was the Town Hall, constructed in 1894, which stood next door to the Royal Hotel. This hotel was the first new building to be built in the resort nearly 50 years earlier.

3.8. Although constructed in 1897, the water tower first appears on the 1928 1:2,500 OS plan, labelled as 'Heacham Water Tower'. It stood in an isolated position to the south of the town on a bend in the road which has since been bypassed. The tower was one of two, with a second tower now demolished on the corner of Lincoln Street and Cromer Road to the north. The Heacham Water Tower was converted to flats in the 1980s and is now known as Redgate House.

3.9. The town continued to grow throughout the early decades of the C20, infilling as well as extending on the northern and southern fringes. Expansion continued after the Second World War, with the 1971 1:10,000 OS plan showing significant new areas of housing at the northern end, with additional extensions to the south. The general planning of the town centre however, with the central green and pier remained unchanged.

3.10. Development on the eastern side of the main road (A149) was sparse throughout the first half of the C20. Glebe House at the northern end and Lodge Farm at the southern tip – both visible on the first OS map – were the largest developments on this side of the road, which otherwise had an open character comprising either small scale development or open spaces such as allotments and a recreation ground. The land to the southeast was agricultural, divided into a series of fields with linear field boundaries.

3.11. By the publication of the 1971 OS plan, development had started to overspill onto the eastern side of the road. A major new development was the construction of what is labelled on the

plan as 'Hunstanton Secondary Modern School' on the southern side of Downs Road. This was constructed within the northern half of an existing field. The southern portion of this field forms the application site and follows the historic field boundaries. A housing development was constructed opposite on the northern side of Downs Road, complete with fire station. By the time of the 1982 OS plan, the housing had substantially increased, with new development including Nursery Drive, Pine Close and Cypress Place.

3.12. Hunstanton Secondary Modern is now known as the Smithdon High School. It was officially opened in March 1955, and was designed by Brutalist architects Peter and Alison Smithson. It was named after the Smithdon Hundred, a historic administrative area which broadly forms the school's catchment area. It continues in use today with over 1000 pupils.

## 4.0 STATEMENT OF SIGNIFICANCE

### 4.1. Introduction

4.1.1. The National Planning Policy Framework (NPPF) makes clear that local planning authorities require applicants to demonstrate an understanding of the significance of any 'heritage asset' affected by a development proposal. It also makes clear that the level of information required 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).

4.1.2. A 'heritage asset' is defined in Annex 2 of the NPPF as an element 'identified as having a degree of significance meriting consideration in planning decisions because of its heritage interest.' This includes statutorily designated heritage assets and assets identified by the local planning authority (e.g. local listing).

4.1.3. Significance is also defined in Annex 2 of the NPPF, as the value of any heritage asset to this and future generations due to its 'heritage interest'. It goes on to say this interest may be archaeological, architectural, artistic or historic, and/or derived from the asset's setting.

4.1.4. This section will identify the heritage interests of the three heritage assets potentially affected, along with the contribution made by their setting with specific reference to the application site.

### 4.2. Chapel of St Andrew

4.2.1. As a scheduled monument, this chapel must be considered generally to be of very high heritage significance.

#### ***Archaeological interest***

4.2.2. This interest has the potential to inform about past activities, and provides evidence about the substance and evolution of a place and the culture that made it, especially in the absence of written records.

4.2.3. Dating to the C13 and C14, the archaeological interest of this monument is considered to be the main source of its heritage significance. The fabric of the structure provides a source of information about past societies of a time that is not richly supported by written records. It is therefore a principal source of information about the people that inhabited this part of Norfolk during the medieval period, their cultures, beliefs and practices.

4.2.4. The chapel also contributes to and aids our understanding and interpretation of the associated cropmarks and earthworks relating to the deserted medieval village of Ringstead Parva which the chapel served.

#### ***Architectural and artistic interest***

4.2.5. The architectural interest of the chapel has been substantially denuded by its ruined

condition which has removed the majority of its architectural features. It is described in Pevsner and Wilson as follows:

*Ruinous. A plain oblong. On the S a pair of blocked lancet windows, on the W an opening, on the E a large window, but without tracery. Probably C13 with C14 alterations.*

4.2.6. Nonetheless, the chapel's dereliction adds to its atmospheric isolation, standing as a ruined structure against the skyline at some distance from public vantage points. Rather fortuitously, this state of dereliction has added to its artistic interest.

#### **Historic interest**

4.2.7. Historic interest derives from the way past people, events and aspects of life can be connected through a place to the present, often by the meanings of the place for the people who relate to it or for whom it figures in collective memory or experience.

4.2.8. The chapel is in a ruinous state, and public access is limited. It is therefore only seen from a distance, and even then views from the A149 are fleeting by virtue of the topography and field boundaries. The date that the chapel fell out of use is not known, however clearly it has been redundant for a number of centuries such that it is likely to have little association with local residents.

4.2.9. The Chapel is the only above ground connection to the deserted medieval village of *Ringstead Parva*, giving a presence to the former settlement that now, aside from the chapel, only survives below ground.

#### **Setting**

4.2.10. Historic England has recently published new guidance on the setting of heritage assets, 'Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets' (March 2015). This supersedes the guidance document published in 2011. It carries forward the steps for assessing the contribution made by the setting to the significance of an asset, and the impacts of development on this setting (assessment steps 2 and 3 respectively). The following assessment follows Assessment Step 2 set out on pages 9 and 10 of the 2015 document.

#### **The asset's physical surroundings**

4.2.11. The asset is situated in an isolated position, set within agricultural farmland some distance from built development. Although it has an open setting, the rolling nature of the topography restricts long range views in some directions. Hunstanton is set on high ground to the north of a small wooded valley along which a stream flows, rising at Ringstead Downs. The chapel is set on the northern side of this valley on Redgate Hill which continues to rise to the north towards Hunstanton.

4.2.12. The application site comprises a separate field enclosed by boundaries. It forms part of a much larger agricultural landscape which characterises the wider setting of the monument to its north, east and south. The fields to the west of the monument form a buffer between it and the suburban C20 sprawl of Hunstanton that has crept southwards down Redgate Hill over the latter part of the C20.





View northwards along the A149 towards Hunstanton with chapel extreme right



View from the western side of the A149

**Experience of the asset**

4.2.13. The asset is experienced as an isolated ruin set within an open landscape. The quiet, isolated nature of the asset's physical surroundings adds drama to its ruinous state, appearing as a 'lost' structure within a timeless (albeit modern agricultural) landscape. As a ruin, the chapel stands quiet and still within the landscape. The lack of public access to the ruin adds to its sense of solitude.

4.2.14. This is however to forget, when viewing the monument from the A149, the busy nature of the road with a constant stream of traffic, and the housing development on the western side to one's back. The noise of the road intrudes into the sense of solitude, as does the suburban character of modern development at the southern tip of Hunstanton which is a reminder of the monument's close proximity to the town.

4.2.15. Looking northeast from the A149 at the valley bottom, the chapel is viewed against the skyline, set within a rolling, open landscape. The rolling topography increases the drama of the view, with the chapel standing against the horizon (although seen at some distance).

4.2.16. Looking southeast from the A149 to the north, the chapel is well screened by the hedged field boundary. Where it is visible, the rolling topography reduces its visibility such that only the upper portions are visible, and even then the chapel is difficult to pick out against the rural background due to the distance.

4.2.17. The asset shares an associative relationship with the earthworks and below ground remains that are the vestiges of the medieval settlement which the chapel served. These are understood to be localised around the chapel.

4.2.18. The application site plays little direct role in the experience of the asset aside from forming a part of a much larger rural area. However, the field boundaries separate the asset from the site visually and spatially, such that there is little interaction between the two. Furthermore, there is no known associative relationship, with the deserted medieval village understood to be restricted to the area around the monument.

**4.3. Smithdon High School**

4.3.1. The school and its gymnasium are both listed in the higher tiers at Grade II\* and therefore



The southern approach along the A149



View to the school from the A149

sit within the top 8% of the nation's listed buildings. They must therefore be considered to be of very high heritage significance in general terms.

#### **Archaeological interest**

4.3.2. The school complex dates to the mid-C20, with later alterations. The fabric itself tells us little of the societies and cultures that made it that could not be understood from other sources, and is not itself of any particular archaeological interest.

#### **Architectural and artistic interest**

4.3.3. The architectural interest of the school is outstanding as reflected in its Grade II\* status. The school is heralded as the first Brutalist building in Britain, the forerunner of an architectural movement pioneered by the school's architects Alison and Peter Smithson (Pevsner and Wilson, 2002, p. 444).

4.3.4. The school takes a simple plan form, comprising a rectangle with two courtyards and central full height hall. This followed an established courtyard plan, however its appearance was reinvented through its expression and use of materials and construction which was later to become an important theme of New Brutalism (Harwood, 2010). The classrooms were originally arranged on the upper floor, with the ground floor providing staff rooms, cloakrooms and dining area along with other ancillary supporting accommodation. Much of this ground floor accommodation has now been put to other uses. The staircases between the floors were open tread, an arrangement that was revolutionary at the time although never to be repeated.

4.3.5. Inspired by Mies van der Rohe, the building has a steel frame that was originally almost entirely glazed, with brick elements apparently added by the architects to lend the building a sense of permanence (Harwood, 2010). All the steels, brickwork, services etc are expressed which gives the building an honesty, but as Pevsner concluded, the effect is 'much too austere for a school' (Pevsner and Wilson, 2002, p. 444).

4.3.6. The gymnasium to the west of the school is a separate block but follows the same principles. It has a symmetrical form, but to suit its function the long north and south walls are constructed in gault brickwork as opposed to glass. This was in contrast to the east and west walls which were originally fully glazed.



View northwards along the A149 to the Downs Road junction

4.3.7. The two school buildings do not survive unchanged. The school has suffered from many problems stemming from the building's design and construction. The extensive floor to ceiling glazing made the building extremely hot in summer and cold in winter, and caused great temperature gradients between the north and south sides of the building. The steel frame was prone to warping, with too few expansion joints and its location in a harsh coastal environment. The glass was not set within a sub-frame, such that when the frame warped the glass either popped out or shattered. Between 1984 and 1991, black panels were inserted on the lower sections of the first floor windows along with the east and west walls of the gymnasium, and the windows now sit within timber sub-frames. Whilst this has made the building more comfortable, it has somewhat compromised the original design aesthetic.

4.3.8. The design is not without its critics. Whilst innovative and influential, its 'fitness for purpose' has been questioned. Pevsner and Wilson quote a contemporary review, which commented that the 'building seems to ignore the children for which it was built' (2002, p. 444). This same theme is reiterated in Jonathan Glancey's review: 'The school was proof...that Modern architects were not necessarily functionalists' (p. 193). Nonetheless, whether influential for the right or wrong reasons, this building situated in the vanguard of British modernism must be considered to be of very high architectural interest.

#### **Historic interest**

4.3.9. The school will have some historic interest to the local community who have attended it since its opening in the mid-C20. Its primary interest however is found in its architectural form and its influence on the post-war Brutalist movement that briefly flourished in the UK rather than its historic value.

#### **Setting**

##### ***The asset's physical surroundings***

4.3.10. The asset is located on the southern side of Downs Road, on the eastern side of the A149. The main school building is arranged perpendicular to the main road, with the listed gymnasium in between the main school block and the road.

4.3.11. The school is located on the high ground at the top of Redgate Hill. It sits within a roughly square plot, with the school buildings arranged parallel to Downs Road at the northern end of the

site. The remainder of the site is set out as playing fields. The western boundary with the A149 is lined with pine trees which create a clear boundary to the road and filter the views into the site. The eastern boundary is hedged, allowing views outwards to the open farmland beyond. The southern boundary takes two forms: the eastern half is bordered with a hedge, whereas the western half is well treed to screen the commercial park which sits to the south.

4.3.12. The school is located to the south of a residential development. Before the construction of the school, this land was open allotments with just two structures fronting the northern side of Downs Road (see 1928 OS plan). Following the construction of the school, the land appears to have undergone further development and is now characterised by suburban residential housing.

4.3.13. To the south of the school is Hunstanton Commercial Park built in the 1980s, introducing built development on its southern aspect. The school is however otherwise surrounded by agricultural farmland to its southeast and east. To the west is the C20 development of Hunstanton.

#### ***Experience of the asset***

4.3.14. The effect of the boundary planting on the southern and western edges of the playing field is to give the school a strong boundary, clearly separating the site from the wider town. As such, it stands as a discrete land parcel on the eastern side of the A149. This is reduced on its northern and eastern aspects (and south-eastern corner), where there is greater connectivity by virtue of the open nature of the site on its northern edge which forms the main entrance to the school site, and the lower hedge on the eastern side of the playing fields. Nonetheless, it stands as a separate entity, separate from the public realm and residential areas as expected of a school site.

4.3.15. The playing field stands to the south of the school and is clearly defined by the boundary planting. As such, it forms the integral element within the setting of the school – allowing views to the full length of the south façade whilst sharing a close functional and associative relationship with the asset. It creates an important sense of space and openness around the main school buildings, allowing the south façade of the main school building to take centre stage in views northwards across the playing fields. The playing field also forms a break in development, with the school sandwiched between the Commercial Park to the south and residential development to the north. The wide scale of the A149 and the green verges give the school buildings and playing field breathing space from the suburban residential development of the town on its western aspect. This lends the school site a greater sense of status and distinction from the otherwise rather ordinary suburban development of the town in the immediate area.

4.3.16. The housing to the west of the A149 shares little relationship with the site, screened by the boundary treatment and taking an entirely different architectural form and use. Similarly, the commercial buildings to the south do not make any positive contribution, taking another different architectural style and relating to a later phase of development that does not share any important connection to the school. The wider landscape to the east complements the green character of the school playing field, giving the school an open, green character in views from the A149 eastwards. This continues in views southeast where they can be gained to the east of the commercial park.

4.3.17. Despite the space around the school, the rather modest scale of the building, its set back nature from the road, and the treed boundary all serve to hide it from public view; it is not a

prominent feature in the approach from the A149. The commercial park exacerbates this, screening views to the school site on the approach from the south, such that you would not necessarily know that the school was there until at close quarters.

4.3.18. In summary, from the northern side, the asset is experienced as an extension of the town, with suburban residential development butting up to the northern elevation of the school on the northern side of Downs Road and along the A149. It has a peripheral location however, surrounded by open landscape to the south and east, with the exception of the commercial park buildings which screen the school from the approach to the south.

#### **4.4. Water tower**

4.4.1. As a Grade II listed building, the asset must generally be considered to be of high significance.

##### ***Archaeological interest***

4.4.2. The water tower is of very little archaeological interest, dating to a period that is extensively documented both in the written and material record. Furthermore, any evidence that it may have provided pertaining to its original use has been eroded through its later conversion to residential flats. Its archaeological interest is therefore considered to be low.

##### ***Architectural and artistic interest***

4.4.3. The water tower takes an interesting form with its castellated parapet and Romanesque detailing. Its scale and ornate detailing renders it something of a landmark feature when entering and exiting Hunstanton, standing guard over the A149. The external elevations have been handled sensitively, with openings inserted within the profile of the Romanesque arches and recesses, such that its external character has been reasonably well preserved. On this basis, it is considered to be of high architectural interest.

##### ***Historic interest***

4.4.4. The water tower is the surviving one of two that originally served Hunstanton. It documents the boom in seaside resorts throughout the Victorian and Edwardian period which saw Hunstanton established as a holiday destination. This character has remained over the C20 and C21, with tourism the central contributor to the local economy. It is therefore considered to be of high historic interest.

#### **Setting**

##### ***The asset's physical surroundings***

4.4.5. The asset is surrounded by C20 development of between one and two storeys with attics which has entirely changed its context. Historically the asset stood some distance from the edge of the town, but expansion over the C20 has engulfed it such that now it sits within the suburban residential development that characterise the edges of the town. The building line of this later



View southwards along A149 to water tower

development sits forward of the water tower in relation to the road, such that the water tower is very much embedded within this wider residential development.

#### **Experience of the asset**

4.4.6. The water tower is prominent in views travelling north and south along the A149 by virtue of its height, which was itself a necessity of its function. Located at the top of Redgate Hill, it forms quite a landmark, although the two and a half storey development of Redgate Heights obscures much of it from view in the approach from the south.

4.4.7. The asset originally stood close to the road, in an isolated location surrounded by open land. This context has been almost entirely lost, with the main road having moved westwards and with the town having extended to engulf the water tower. This expansion has spread further southwards, such that the water tower is not even on the edge of the main settlement, but well and truly forms part of the main development of the town. The open space to the east of the water tower between it and the A149 is a vestige of its former context, but does little to alleviate the sense of suburban development in the immediate vicinity.

4.4.8. The setting of the asset is not therefore considered to make an important contribution to the heritage significance of the asset.

## 5.0 PROPOSED DEVELOPMENT

### Land allocation

5.1. Two land parcels are being promoted through the local plan process as sites F2.3 and F2.5 for housing and commercial use respectively. Both sites are contained within the field located to the south of Hunstanton Commercial Park, which comprises the application site. The employment site is located directly to the south of the existing commercial park, with the remainder of the field zoned for residential development.

### Outline application

5.2. The proposals for land south of Hunstanton Commercial Park comprise residential development (including housing with care accommodation), a care home and light industrial/commercial development on a 6 ha site.

5.3. All matters are reserved aside from access.

## 6.0 IMPACT OF DEVELOPMENT ON SIGNIFICANCE

6.1. For the purposes of the land allocation process, and given that this application is made in outline only with all matters aside from access reserved, it is primarily the principle of development on this site that requires assessment.

### **Impact on the Chapel of St Andrew**

6.2. The application site is some distance from the asset, therefore the question is the impact of development on the wider agricultural landscape setting.

6.3. Historic England (formerly English Heritage) have commented on the land allocations as part of the consultation process. In their comments on F2.3, they raise concerns as to the impact on the setting of the chapel, stating that development on this site would detract from its rural and remote setting.

6.4. It is acknowledged that development on this site will change the character of the application site from one of agricultural land to suburban housing. In doing so, the edge of Hunstanton on the eastern side of A149 will creep closer towards the scheduled and listed monument. In the wider context of the chapel and the existing extent of Hunstanton however, this change is not considered to be so substantial such that the sense of its remoteness or rural setting would be materially altered.

6.5. The asset will retain its remote character, with the proposed development edge maintaining a buffer between it and the monument. The existing field boundary already separates the field from the monument. This will be augmented further to strengthen this degree of separation between the town and the monument. The overriding rural nature of the surrounding landscape will remain unchanged.

6.6. In the main approach from the south, the chapel is seen some distance from the road. The levels are such that development would not impinge on this view. Similarly, the existing field boundary screens views to the chapel when travelling south along the A149, such that it is not a prominent feature in the landscape. Development on this site would not therefore distract from important views to the monument.

6.7. Any loss would therefore be limited to the loss of a small, discrete parcel within a much larger rural landscape. It is considered here that the impact of this on the setting of the chapel would be negligible. The application site makes no important contribution to our understanding or appreciation of the monument, and sufficient rural land would be retained around the monument as to maintain its rural and remote setting. The retention of this wider open character is demonstrated by the 1971 OS plan above which has been marked up to show the application site. This highlights the modest size of the application site in the context of the much greater scale of the asset's surrounding rural landscape.



## Impact on Smithdon High School

6.8. The application site itself has no associative or functional relationship with the school, therefore in this respect development on this site would not cause harm. The issue is rather how development here changes the way in which the school is 'experienced'.

6.9. It is acknowledged that the proposals for land parcels F2.3 and F2.5 would increase the amount of development on the eastern side of the A149 which has historically been less developed, and introduce a quantum of development to the south of the school site.

6.10. Historic England commented that this change would 'further divorce the school from its rural context and surroundings and impact on views to and from the school'. The rural context of the school has not been identified to make an important contribution to its significance. Notwithstanding this, the impact on this rural landscape is explored below.

6.11. The open setting to the east of the site, which allows open views across the playing fields to open land beyond, would be entirely retained, as would the playing field itself which is a feature of the setting which makes the greatest contribution to the significance of the building.

6.12. Views outwards from the school buildings to the application site would be at some distance across the playing fields and through the boundary screening. Development on the site could be of an appropriate mass and scale on its northern boundary to mitigate the impacts further of the appearance of development in this location.

6.13. Historic England commented that the proposals would 'have a notable impact approaching the school from the south'. When travelling northwards along the A149, the school buildings are not visible from a distance. Even at closer range they can only be glimpsed through the trees, and even then are seen at some distance across the playing fields. It is not until one approaches the school itself that the buildings begin to be revealed, by which time the application site is behind you. It is not considered therefore that the development, with appropriate scale and massing, would have any detrimental impact on views from the south.

6.14. It is acknowledged that setting is not simply a visual consideration. Development on this site will alter the experience of the approach from the south by increasing the sense of built development before one nears the school. However, the school does not enjoy an isolated position, with development stretching southwards beyond the school site along the western side of the A149. Therefore, the sense of suburban residential development already forms part of this approach, albeit mostly limited to the western side of the road. Nonetheless, the introduction of housing here is an extension of the existing suburban character, which already forms part of the setting of the asset, and is therefore insignificant.

6.15. Perhaps most fundamentally however, the significance of this asset lies primarily in its architectural interest, comprising an influential building by internationally renowned architects who went on to establish the New Brutalism movement in the UK. It derives little significance therefore from its setting, it is rather the design itself and association with Alison and Peter Smithson – neither of which will be affected by these proposals.

### **Impact on the water tower**

6.16. Given the extent of change that the setting of the water tower has undergone, changing it from one of splendid isolation to integration into Hunstanton proper, development on the site to the east of the A149 is not considered to have an adverse impact on its heritage significance.

### **Alternative sites**

6.17. Historic England suggest that alternative sites to F2.3 and F2.5 should be developed. Notwithstanding the fact that it is considered here that, with sufficient attention paid to the reserved matters stage these sites can accommodate change without serious harm, the sites suggested by Historic England are not available. Land to the north of Downs Road is not available (please refer to the analysis of alternative sites as set out in 'Preferred Options for a Detailed Policies and Sites Plan, July 2013), and land to the south of Hunstanton is the subject of a current application for 120 dwellings (ref. 14/01022/FM). If this is successful, it nevertheless does not meet the identified need to provide 220 new dwellings within the town as set out in CS05 of the Core Strategy. Therefore sites F2.3 and F2.5 remain necessary.

## 7.0 CONCLUSIONS

7.1. The adopted Core Strategy (2011) has identified the application site to be a location for employment expansion. The Inspector's Report (May 2011) confirmed in paragraph 82 that an extension in the broad location of sites F2.3 and F2.5 was sound on the basis that 'the town has long since 'broken out' to the east of the A149 in that area'. Clearly, this site was considered capable of accommodating development without causing unacceptable levels of harm to the surrounding heritage assets. This is consistent with our assessment.

7.2. When examining the Core Strategy, the Inspector ordered the removal of a broad arrow indicating expansion of the town to the southeast. Historic England have suggested that the application site could be considered to fall within this area. The left hand side of this arrow is positioned to the south of the roundabout with the A149 and B1161, and sweeps northeastwards to create an arc. Although clearly indicative and broad brush, the application site does not fall within this zone.

7.3. The emerging Site Allocations Plan is at an advanced stage and therefore carries some weight. Policies F2.3 and F2.5 deal with the application site and both promote the site for residential and employment use respectively.

7.4. Emerging Policy F2.3 states that development will be subject to mitigating landscaping to minimise the impact of development on the setting of Smithdon High School and St Andrew's Chapel. This is accepted by the applicant, and the indicative scheme demonstrates how such landscaping could be provided. Clearly the water tower is not considered to comprise a constraint on development in this location. A further condition on development in this location is the preparation of a Heritage Asset Statement. That is in part the purpose of this report which has concluded that the scale of the impacts are such that the proposals are not considered to result in harm to the heritage significance of the high school, chapel or water tower. It is considered that the development on site F2.3 can comply with emerging policy.

7.5. Neither the policy nor justification text with relation to site F2.5 make reference to heritage impacts, therefore the setting of the school, monument and water tower cannot be considered by the Council to be a significant constraint on development on this site. Indeed the emerging land promotion seeks a reallocation of land allocated in the 1998 Local Plan (Saved Policy 7/4), and has therefore previously been found to be an acceptable location for development.

7.6. Core Strategy Policy CS05 deals with Hunstanton. It sets out a strategy to allocate at least 220 dwellings to the east and/or south of the town. It also guides that the strategy will seek to enhance the local character of the town and in particular respect the heritage of Hunstanton. Policy CS08 is an area wide policy promoting sustainable development, a strand of which is an objective to sustain and enhance the historic environment. Policy CS12 deals specifically with environmental assets. It guides that proposals to protect and enhance the historic environment will be encouraged and supported.

7.7. Paragraph 126 of the NPPF guides that local planning authorities should set out a positive strategy for the conservation of the historic environment. Paragraph 131 guides that when determining planning applications, local planning authorities should take account of the

desirability of sustaining and enhancing the significance of heritage assets. Paragraph 132 states that great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be. It goes on to guide that substantial harm to heritage assets of the highest significance, including Grade II\* listed buildings and scheduled monuments, should be exceptional.

7.8. This heritage assessment has identified that the principle of development in the location of sites F2.3 and F2.5 is acceptable without causing material harm to the setting of adjacent heritage assets. It is considered that the development on the site can be designed and delivered in such a way, along with mitigation landscaping, so as to safeguard their heritage significance.

7.9. Notwithstanding the above, should it be considered that material harm would arise, this would be limited and clearly less than substantial. In this scenario, the public benefit delivered through meeting an identified housing need and provision of a care home facility is considered to outweigh any limited harm. The proposals in this instance would therefore be considered to accord with paragraph 134 of the NPPF.