



**Examination of Kings Lynn and West Norfolk Local Plan**

**Matter 5, Issue 5**

**Settlements and Sites**

**Q152 Downham Market Town Centre and Retailing**

**Q166 Hunstanton – Land south of Hunstanton Commercial Park**

**Q195 Castle Acre**

**Historic England, Hearing Statement**

**December 2022**

Historic England is the principal Government adviser on the historic environment, advising it on planning and listed building consent applications, appeals and other matters generally affecting the historic environment. Historic England is consulted on Local Development Plans under the provisions of the duty to co-operate and provides advice to ensure that legislation and national policy in the National Planning Policy Framework are thereby reflected in local planning policy and practice.

The tests of soundness require that Local Development Plans should be positively prepared, justified, effective and consistent with national policy. Historic England's representations on the Publication Draft Local Plan are made in the context of the requirements of the National Planning Policy Framework ("the Framework") in relation to the historic environment as a component of sustainable development.

# Historic England Hearing Statement

## Introduction

- 1.1 This statement addresses the Inspector's questions with regards Matter 1 of the Local Plan.
- 1.2 This hearing statement should be read alongside Historic England's comments submitted at previous consultation stages of the Local Plan on 29<sup>th</sup> April 2019 and 27<sup>th</sup> September 2021.

## Matters and Issues for Kings Lynn and West Norfolk Local Plan Review

### MATTER 5 – SETTLEMENTS AND SITES

**Issue 5: Are the proposed settlement and site allocations policies justified, taking into account the reasonable alternatives, and are they positively prepared in meeting the Borough’s development needs, effective in terms of deliverability over the Plan period and consistent with national policy in enabling sustainable development?**

#### ***Downham Market: Town Centre Area and Retailing (Policy F1.1)***

**152. Should Policy F1.1 and its supporting text make more detailed reference to the specific character and appearance of Downham Market?**

2.1 In our regulation 19 response Historic England commented that ‘The policy could be improved by making more detailed reference to the specific character and vernacular of Downham Market within the policy as in paragraphs 10.2.4 and 5.’

2.2 The Council has proposed a modification to paragraph 10.1.4 to read:

10.1.4 The town has a wealth of historic buildings and other heritage assets, reflected in an extensive Conservation Area and numerous listed buildings. The distinctive Victorian Clock Tower provides a focal point in the handsome Town Square. [Further information is available through the Conservation Area Character Statement for Downham Market \(link to document\)](#)

2.3 Historic England welcomes this proposed change and this matter has been agreed through our signed Statement of Common Ground.

#### ***Hunstanton: Land South of Hunstanton Commercial Park (Policy F2.3)***

**166. Is Policy F2.3 consistent with national policy in respect of the approach to Heritage Assets?**

2.4 Whilst there are no designated heritage assets within the proposed site allocation, there are two grade II\* listed building to the north of the site as part of Smithdon school, the scheduled and grade II\* listed remains of the Chapel of St Andrew to the south east and a grade II listed water tower to the west.

2.5 We acknowledge that this site was allocated in the 2016 SADMP and indeed permission has been granted in 2016 for the site. However, we continue to

have concerns regarding this allocation and the impact on the historic environment.

- 2.6 We have stated on a number of occasions over the last decade that development in this location would harm the significance and setting of the Grade II\* listed Smithdon High School to the north and the Grade II\* listed and scheduled remains of St Andrew's Chapel to the south-east. Development of the site would further divorce the school from its rural context and surroundings and impact on views to and from the school. Indeed, we have raised concerns as recently as September 2022 in our consultation response to the full planning application for this site.
- 2.7 Built in the early 1950s, it has associations with agricultural training and was intended to be located on the edge of town. Its setting has already been compromised to the north and west, meaning that its eastern and southern setting is even more important to maintain. The development site would also detract from the setting of the listed and scheduled chapel, which currently enjoys a largely rural and remote location within the countryside.
- 2.8 Although the draft policy (criteria 4c and e) refers to the need to minimise impact on these heritage assets (as well as the North Norfolk AONB) and the submission of a heritage asset statement, development in this location will still represent a marked change in the landscape and the growth of Hunstanton. Furthermore, the introduction of additional planting into the landscape may, in itself, cause harm rather than mitigate impacts.
- 2.9 Therefore, whilst we maintain our concerns about the site and the impact of development on the historic environment, we acknowledge that the principle of development has been established, both through previous local plan allocation and also planning permission. Careful mitigation through landscaping and design will be key to minimising harm to heritage assets. Criterion 4c and e will be helpful in this regard. The policy could be further strengthened by adding reference to the need to conserve or where appropriate enhance the significance of heritage assets in line with the requirements of the NPPF.

**195. Is the allocation of the site at Castle Acre – Land west of Massingham Road justified given its proximity to the Castle Acre Conservation Area and a listed building?**

- 2.10 As commented during the previous local plan consultations, we continue to have some concerns about this site in terms of its location on the edge of Castle Acre Conservation Area and its proximity to a listed building. However,

it remains a more preferable site than some other potential sites within the village.

- 2.11 The policy requirement for development to conserve the setting of the conservation area and listed building is welcomed and the need for the design and layout to preserve and enhance the conservation area. However, the conservation area character statement identifies an important unlisted building within the site. It is not clear from the policy or supporting text what would happen to this building, with the potential for its demolition and resulting harm to the significance of the conservation area.
- 2.12 As currently drafted, the plan is unsound in terms of its effectiveness, deliverability and consistency with national policy. Planning Practice Guidance, Paragraph: 002 Reference ID: 61-002-20190315, Revision date: 15 03 2019 states that: Where sites are proposed for allocation, sufficient detail should be given to provide clarity to developers, local communities and other interested parties about the nature and scale of development.
- 2.13 Paragraph 16d of the NPPF also states that only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan. Protecting and enhancing the historic environment is a strand of the environmental objective of the planning system (Paragraph 8c) and Local Plans should set out a positive strategy in this respect (Paragraph 190).
- 2.14 In order to make the plan sound, there should be wording that requires development to retain and conserve the important unlisted building. We recommended that G22.1 is amended to include a requirement that development should retain and conserve the important unlisted building.
- 2.15 We note that planning permission has now been granted for this site.
- 2.16 The Council is now proposing additional wording as a proposed modification in the supporting text at paragraph 12.3.2 to highlight the Conservation Area Character Statement for Castle Acre as follows:

12.3.2 Castle Acre has a number of historic character buildings and a large part of the village is designated a Conservation Area to preserve and enhance its special historic and architectural quality. In the main the older buildings are of two storeys with pitched roofs, and the predominant building material is rough knapped flint with orange / red brick quoin and also red brick itself. Roofs are normally in orange / red clay pantiles. Further information, regarding designated and significant non-designated heritage assets is available through the Conservation

[Area Character Statement for Castle Acre \(add link\).](#)

- 2.17 Historic England welcomes this proposed change and this matter has been agreed through our signed Statement of Common Ground. Although not a change to the policy this does help clarify the position in relation to the building.