



Heritage Gap Analysis Study for Neighbourhood Plan

Produced for Cathedral Magdalen & St Augustine's Forum

Revision Schedule

Heritage gap analysis study for neighbourhood plan

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1. Introduction

- 1.1 Neighbourhood Plans (NP) were introduced under the Localism Act 2011. The National Planning Policy Guidance 2018 (NPPF) and Planning Practice Guidance on Neighbourhood Planning (PPGNP) (updated to 13.9.2018) provide further guidance amongst others. The NP should have regard to national policy. There is no set evidence base for a NP, and the evidence on which the NP is based should be proportionate and robust, it is this evidence which is used to explain the intention and rationale of the policies in the draft local plan.
- 1.2 Planning authorities such as Norwich City Council or Norfolk County Council should share relevant evidence where it is available. Where a NP contains policies on housing these should take account of the most up to date evidence of housing need. Further guidance can be found in the PPGNP and the associated links:
<https://www.gov.uk/guidance/neighbourhood-planning--2>
- 1.3 Section 3 of the NPPF discusses the role and position of non-strategic policies, such as NP from para. 28 to 37, including conserving and enhancing the historic environment. Section 16 Conserving and enhancing the historic environment of the NPPF discusses the value of heritage from universal to local value stating that these heritage assets are an irreplaceable resource. Para. 185 states that:

'Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:
 - a) *The desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;*
 - b) *The wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;*
 - c) *The desirability of new development making a positive contribution to local character and distinctiveness; and*
 - d) *Opportunities to draw on the contribution made by the historic environment to the character of a place.'*
- 1.4 Historic England published 'Historic England Advice Note 11: Neighbourhood Planning and the Historic Environment' (AN11) on 16.10.2018. It sets out why heritage issues are important in the neighbourhood planning process, what evidence may be appropriate and where help may be sought. This considers 'designated' (protected) and 'non-designated' (lacking formal protection) 'heritage assets'.
- 1.5 The CMSA Forum is at the stage of evidence gathering. Identification of evidence, identification of gaps, and progressing towards filling those gaps to identify the issues affecting the historic environment.

2. Baseline evidence

- 2.1 Page 7 of AN11 sets out an historic environment checklist for neighbourhood planning groups and Section 2 discusses an evidence base. Part of the evidence base is about community values through community engagement, and part about an audit of what is protected and its condition.

Community values

- 2.2 Opportunities exist to record community values on a geographical basis via an app, <https://placecheck.info/en/> which is free to community groups. A number of other community planning toolkits are also available, some are set out on page 12 of AN11.
- 2.3 Further work in this area may be needed.

Conservation Area

- 2.4 The current City Centre Conservation Area Appraisal and Management Plan (Appraisal) was approved and published in 2007. At 11 years old, it is out of date and does not take into consideration new national and local planning policy and guidance and did not follow best practice for designation at the time (the Anglia Square shopping complex would have been removed). The proposed plan area is covered by Northern City, Anglia Square, Northern Riverside and Colegate character areas.
- 2.5 The Appraisal, included the area covered by the Northern City Centre Area Action Plan which has expired (2016), and principle national and local planning policies which have been updated as follows:
- a) National Planning Policy Framework, July 2018
 - b) Conservation Area Designation, Appraisal and Management, as amended February 2016
 - c) Joint Core Strategy as amended, January 2014
 - d) Development Management Policies Plan, December 2014
 - e) Site Allocations and Site Specific Policies Plan, December 2014
 - f) Emerging local plan documents 2018 onwards
- 2.6 The new North City Neighbourhood Plan area includes 1. Northern City; 2. Anglia Square; 3. Northern Riverside; and, 4. Colegate. (A further six character areas are covered by the CMSA).
- 2.7 The North City area has changed significantly and will change further, some derelict sites will be developed, and other buildings and sites replaced, with growth overtime. The Appraisal was not developed in a modern policy context and given its date is unlikely to have been adopted at that time as an SPD, more likely as an SPG which carries slightly less weight in relation to other planning policies in modern planning.
- 2.8 Discussion with the City Council suggests that they consider that the Appraisal is fit for purpose, there is no wish to revisit the document. Based on the above evidence the document appears to be unsound. In terms of policy hierarchy an adopted NP has the same status as a local plan document, this is of higher importance than a conservation area

appraisal SPG. Although there is lethargy to update the Appraisal resolving the currency of the contents of the document which are relevant to the NP area is possible through the NP.

- 2.9 The key areas for updating are in relation to national and local policy, other matters of context including history and archaeology where there has been further research, current and former uses, revision to character areas, policies and guidance and management plans for future development and regeneration. The maps will also need to be updated, with their accuracy improved. In particular the views and the location of designated and non-designated heritage assets. This/these map(s) and lists could be an addendum to the NP to allow for ease of updating.

Historic Environment Record

- 2.10 Norfolk Historic Environment Record which will include buildings, archaeology and find spots and any reports written regarding the historic environment record. The map extract below gives an indication of some of the known entries on the HER, this is a partial record <http://www.heritage.norfolk.gov.uk/>. The full information will be provided free in relation to the NP.
- 2.11 On the map, red dots and lines are scheduled monuments, blue squares are listed buildings, orange triangles are find spots. The red hatched areas vary from monuments to areas where archaeological research has been undertaken.



National Designation Database

- 2.12 Hosted by Historic England the designation database holds listed buildings, scheduled

monuments, registered parks and gardens, wrecks (river) and battlegrounds. No world heritage site exists within Norfolk. A dataset within a given area can be requested directly from Historic England. It will be up to date at the time of request.

World War II City Bomb Map

- 2.13 Held at the Records Office at County Hall the bomb map can quickly indicate those areas affected and where historic building are likely to have been damaged and perhaps rebuilt. Repairs and rebuilding can affect the value of the fabric of the historic environment and can also offer opportunities for change.

Heritage At Risk (HAR)

- 2.14 Formerly known as buildings at risk (BAR), national and local heritage at risk register includes all types of heritage asset. Many 'non buildings' are also considered at risk across England. Both the national and Norwich HAR are drawn up on the basis of information collated by the conservation team at the City, this information is supplemented by Historic England. Both are updated and published annually. The latter includes grade II listed non-ecclesiastical buildings and unlisted buildings of architectural or historic merit in addition to other categories collated by Historic England. The 2018 details are set out below.
- 2.15 There are 4 heritage assets on the national Heritage at Risk (HAR) register, managed by Historic England within the plan area: Church of St George, Tombland (grade I); Octagonal Chapel, Colgate (grade II*); Church of St Mary the Less, Queen Street (grade I); Bishop Salmon's Porch, The Close (scheduled monument and grade II*).
- 2.16 St George's and St Mary's churches also form part of the local HAR register for the plan area, there are a further 9 assets on the 2017 Norwich City register which fall within the plan area: 3a Wright's Court (part of 1-3 Wright's Court)(Grade II), Elm Hill; 26-28 Elm Hill (Grade II*); The Cat and Fiddle PH, 105 Magdalen Street (Grade II); 107-109 Magdalen Street (grade II); Precinct Wall (Cathedral) St Faith's Lane (west end) (grade II*); telephone call box, St Andrew's Plain (unlisted); Ethelbert Gate, Tombland (scheduled monument and grade I); 16 Elm Hill (grade II).
- 2.17 Conservation areas can also form part of the HAR register. The City Centre Conservation Area covers a large area, some areas are not at risk and others certainly are, indeed much of the north city area could be considered at risk. However, because the whole conservation area is not at risk, this means that it has not been added to the HAR register, this perhaps prejudices funding availability.
- 2.18 No full survey of the NP area has been undertaken. It is possible that there are hidden items at risk, such as basements. Options include undertaking an informed valuation of all designated heritage assets and specific use types of non-designated assets (for example occupied single family homes are more likely to be in good condition).

Area of Main Archaeological Interest within the City Walls

- 2.19 Within the Norwich City Walls (a scheduled monument) the area is designated as an 'area of archaeological interest' under development management policy DM9 of the Norwich City Local Plan. This means that where below ground works are proposed, and archaeology is

possible, further consideration of the archaeology including perhaps trial excavation will be needed. This is often an undefined development cost.

- 2.20 Greater awareness of the policy could be highlighted through the NP.

Heritage Interpretation

- 2.21 Policy DM9 also signposts the need for heritage interpretation, further details are contained in the Heritage Interpretation SPD. Similarly, to the area of archaeological interest there is an undefined but usually smaller cost, and lack of awareness.

Buildings and Structures of Local Architectural or Historic Importance

- 2.22 The Norwich Society had developed a list of 122 buildings across the City which they consider are of sufficient architectural or historic merit to be considered non-designated heritage assets and offered a degree of protection.
- 2.23 Norwich City Council have a list of locally listed buildings both within and without conservation areas, many of these are those on the Norwich Society list. Further buildings may be included in the Appraisal.
- 2.24 Yet others may be identified from other or new work by the Norfolk Vernacular Buildings Group or the Norwich Society or other groups, work in relation to development proposals, or perhaps community work.
- 2.25 There is no identified single source of these buildings, possibly leading to confusion. Introducing one location which is easily to update would be positive. Combining the lists may require further survey and investigation.

Regeneration

- 2.26 Any area which may be considered under the NP for regeneration could helpfully involve further research. Creating a consolidated known history for the site, to identify any potential archaeology, any historic assets which might be hidden, the opportunity for re-establishment of historic street or plot patterns or other matters which the Forum thought relevant. The research would need to be done on a site by site basis. Actual archaeological excavation would be carried out at the developer's cost, unless the community can establish a trust.

3. Funds and Support

- 3.1 With a NP in place following agreement at referendum 25% of the revenues of the Community Infrastructure Levy generated from development within that area will benefit the community. In areas without a parish or town council the City Council (in this case) would engage with the community to establish priorities. Identifying projects within the NP is important but other ways of identifying priorities are possible. (PPGNP para 003).
- 3.2 Locality and RTP/Planning Aid offer technical and financial support through <https://neighbourhoodplanning.org/> . Grants of up to £9,000 may be available, and a further £8,000 if there are complex issues.
- 3.3 Locality funding within the City Council may be available.
- 3.4 The Heritage Funding Directory sets out known available funding for the heritage sector. The database has 460 sources covering museums, heritage, conservation, buildings, education and publications. It is difficult to narrow down the potential funding source without knowing exactly what will be required by the Forum. Grants or loans to fill the gaps identified here fall outside the Architectural Heritage Fund's remit.
- 3.5 There are a number of grants available to build skills within the community. We can train and supervise volunteers to carry out various elements of research, which would reduce costs, increase the skills in the historic environment within the community and increase knowledge of the locality within the community more generally, where volunteers discuss what they are doing with friends and family.
- 3.6 National Lottery Fund/Heritage Lottery Fund, most programmes require some match funding and not from the NLF/HLF all of the schemes below may be applicable to the heritage gaps identified. The relevancy depends on who runs the project, who delivers the project, who benefits from the project, and the extent of the project. Further research will be needed:
 - a) Awards for All – for improving places and spaces that matter to communities that make a difference to the community £300-10,000.
 - b) Reaching Communities - £10,000+ for up to 5 years for organisations who want to take action on the issues that matter to people and communities and can include staff salaries, project activities, running costs, equipment and organizational development
 - c) Partnerships - £10,000 for up to 5 years for organisations which work together with shared goals and values. Similar inclusion to Reaching Communities, perhaps less relevant.
 - d) Sharing Heritage – Projects of £3,000-10,000 a year or less to complete and has not yet started and is people focused. People will have learnt about heritage or developed skills or changed their attitudes and/or behaviour and more.
 - e) Our heritage – is similar for projects over £10,000 and less than 3 years to complete.
 - f) Resilient heritage – £3,000-250,000 supports existing groups taking on new work for example or a particular building. The Norwich Society or other existing body might apply where the group take on new activities for example.
- 3.7 Historic England undertakes a programme of thematic research increasing understanding in certain areas. Current potentially relevant research early history, Coastal Marine and

Maritime, Faith and Commemoration, Industrial, Urban and Public Realm Heritage. There may be some opportunities under the themes to use Norwich case studies or assimilate existing research.

- 3.8 Heritage Action Zones have been allocated a further 4 years of grant funding with schemes running 2020-23, there could be up to 60 across the country. Existing schemes are located in King's Lynn and Lowestoft, in communities where the heritage is considered to be at risk. Deprivation indices may be high in parts of the CMSA Area with investment in property and the historic environment a low priority, but timing is crucial. The approved planning application for Anglia Square, subject to decision to call in the application by the Secretary of State, could impact on the chance of success of any HAZ application. The chance of a successful HAZ bid is low due to the existing scheme at Kings Lynn, limited resources, and the perception of Norwich as thriving with other sources of government funding. Where the Anglia Square Scheme is approved the inward investment opportunities could act as a catalyst for the regeneration of the north city area and a HAZ application is unlikely to be successful.
- 3.9 The City Council are required to provide assistance to communities to develop their NP. The level of support provided may begin with provision of evidence, discussion of the processes and running their necessary elements to progress the NP through to adoption. Also, the introduction of any Article 4 Directions will require support in kind from the City Council.
- 3.10 The New Anglia Local Enterprise Partnership offer a 'community challenge fund' which can be used to fund schemes which help persons back into the jobs market. This may be an avenue to explore further where evidence collection is intended to be done by volunteers. The lead organisation must already be operating in the area.

4. Article 4 Directions

- 4.1 Article 4 Directions remove permitted development rights on different types of uses or on particular changes of use. There are two common types which may be relevant to the NP. Those relating to dwelling houses which might restrict the removal of front boundary walls for example in a conservation area, and removing the right to change offices to residential (Class O).
- 4.2 There are two existing Article 4 Directions in Norwich. One at Bracondale and the other at Heigham Grove both in relation to conservation areas.
- 4.3 Flats do not benefit from permitted development rights; all development requires planning permission. Buildings in multiple uses may not have permitted development rights, it will be dependent on circumstances. Some new development may have been granted conditional planning permission where the permitted development rights are removed by condition.
- 4.4 Listed building and scheduled monuments require applications under separate legislation.
- 4.5 Directions can either be made immediately and confirmed after public consultation where there is a risk that the architectural detailing will be lost in the intervening time (6 months) or can be made following consultation where the risk is less, such as Class O, as notification to the Council is required. Statutory time periods apply as do statutory notices and procedures.
- 4.6 The Council would wish to advertise before the making of the direction on the removal of the right to change from offices to residential (Class O). They have advised that they would wish to give a years' notice, this would allow a number of building owners to make the necessary application before the Direction comes into place. This may of course mean that all appropriate buildings may have approval to be converted before the Direction is made, removing the purpose of the suggested Direction.
- 4.7 A community group cannot make Directions, there is no reason why such a group could not inform such a process with surveys for example on areas of concern and details of addresses which should be covered. The Council or other government body need to run the process.

5. References

<https://www.historicengland.org.uk/advice/hpg/historic-environment/neighbourhoodplanning/>

<https://www.historicengland.org.uk/advice/hpg/decisionmaking/NPPF/>

<https://www.gov.uk/guidance/neighbourhood-planning--2>

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/229749/Neighbourhood_planning.pdf