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Our ref: P01574866

22 April 2024

Dear Ms Lawty

**T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**LAND TO THE EAST OF WEST WINCH VILLAGE, KING'S LYNN
Application No. FUL/2024/0001**

Thank you for your letter of 22 March 2024 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

Historic England Advice

Significance of heritage assets

There are a number of designated heritage assets in the area around the proposed access road. They include:

- Church of All Saints, North Runcton (Grade I)
- Church of St Mary, West Winch (Grade II*)
- West Winch War Memorial (Grade II)
- The Mill, West Winch (Grade II)
- Old Dairy Farmhouse, West Winch (Grade II)
- The Gables, West Winch (Grade II)
- Bull Cottage, West Winch (Grade II)
- North Runcton War Memorial (Grade II)
- North Runcton Lodge (Grade II)
- The Old Rectory, North Runcton (Grade II)

We understand that there are a wide range of archaeological sites known along the route. Roman period settlement evidence has for example been identified in the northern half of the route, as well as a background of prehistoric evidence. In term of archaeology, recent geophysical survey (Chapter 7: Appendix 3: Geophysical Survey Report - Parts 1, 2 & 3) has also identified several new sites and anomalies of



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archaeological interest.

In addition, a substantial moated site lies immediately to the south of St Mary's Church and the West Winch War Memorial. The three sites create an interesting group, with the church relating to the historic farmstead and the moat being a possible manorial site contemporary with St Mary's. All three heritage assets have a long-standing relationship to agricultural land which contributes to an understanding to them as structures in a rural community. In addition, the church is a landmark building in this rural setting, emphasising its pre-eminent status in the community.

There is also a well-preserved medieval landscape within the study area, with settlements centred on around West Winch and North Runcton. Both villages have a strong medieval character defined by the Grade I and II* Churches, and from other features including the moated site at West Winch. Although the moated site is non-designated, we would consider this feature to be of equivalent value in Planning Policy term and is likely to relate to some form of manorial complex, one of several medieval moated manors running along the fen edge.

The rural character of the landscape surrounding the above cited heritage assets therefore forms an important part of their significance.

Impact of proposals

Proposals are for a new 40mph access road with roundabout, access junctions and overpass across Rectory Lane (WWHAR), associated with the West Winch Housing development (13/01615/OM and 18/02289/OM).

Proposals would introduce a new built form into the wider rural landscape and adversely impact the setting of a number of heritage assets in the area around the access road: Proposals would change how the churches of All Saints (Grade I) and Saint Mary (Grade II*) would be viewed and approached and their rural setting would be partly eroded.

The road would also bisect the two medieval villages of West Winch and North Runcton and therefore would divide these two closely related settlements. The assessment of impact would need to reflect this relationship and how this would be impacted by the development. It is not clear at this stage if the applicant has taken this into consideration

The proposed overbridge over Rectory Lane would potentially be highly visible and intrusive to the rural setting of North Runcton and West Winch, though we note that no detailed sections for the overbridge appear to have been provided.





Given the scale of the proposed development and the surrounding landscape character, this development would be visible across a large area and would, as a result, affect the significance of heritage assets at some distance from the site itself.

The proposed development would also have a potential impact on the significant on a number of non-designated and archaeological sites.

Policy consideration

The National Planning Policy Framework sets out the desirability of sustaining and enhancing the significance of heritage assets, paragraph 205. It continues that great weight should be given to their conservation and that any harm requires clear and convincing justification, paragraphs 205 and 206. Where a proposal will lead to less than substantial harm, this should be weighed against the public benefits of the proposal, paragraph 208 and 209.

Historic England's Position

We recognise that there are potential strong public benefits to proposals, but we are concerned that, at present, we cannot yet confirm that the mitigation proposed would be successful and we are therefore unclear about the validity of the conclusions in the Environmental Statement (ES).

We note the applicant has provided a full ES chapter on heritage matters (Chapter 7 Archaeology and Heritage), with associated desk-based assessment, geophysical survey and WSI.

We broadly accept the assessment of heritage impacts of the ES. However, no heritage-specific viewpoints or photomontages are given in order to address the impact assessment under Chapter 7 of the National Planning Policy Framework.

Proposals repeatedly refer to landscape mitigation strategies which would reduce the impact of proposals on heritage assets. However, further clarity is needed about what the details of these mitigation strategies are in order to be able to fully assess whether the proposed mitigations would be sufficient to reduce the level of harm that would be caused as per the ES (Chapter 6, Tables 6.1-6.9). In particular, details about mitigation strategies for the road's setting impact on the two medieval settlements (West Winch and North Runcton), the two medieval churches and the moated site are needed.

With regards to archaeology, a clear mitigation strategy should be agreed with the Norfolk County Council archaeologist as per the policy requirements of the NPPF.

It is clear there are significant non-designated and archaeological heritage assets with





evidential value present across the development area. The significance of these assets has not yet been fully determined and the applicant has confirmed there has not been a trenched evaluation at this time.

We note the response from the LPA archaeological advisors and support the request for a suitable condition to be applied to the permission, and that a two-phase approach to the work is envisaged.

Although we support the need for the condition, we would recommend a trenched evaluation is undertaken prior to the determination of the scheme. This is to ensure that the significance of the non-designated heritage assets and archaeological is determined. Once the scheme has been approved it will not be possible to provide any meaningful mitigation through design changes, such as amending the design or route to avoid areas of high significance.

We recognise this is a decision for the determining authority, but we recommend evaluation is undertaken prior to the determination of the scheme as an approach that represents a significant mitigation of risk, allowing for a more robust approach to mitigation by design.

Given the varied richness of heritage assets and historic landscapes potentially affected by these proposals, we recommend further work is undertaken to consider opportunities for unlocking the wider heritage benefits of this scheme and its wider development. This could for example consider a strategy for wayfinding, connectivity and heritage interpretation of these heritage assets; such enhancements would add a heritage value to the area. Other strategies could for example explore promotion or provision of sustainable routes between villages, and King's Lynn.

Recommendation

Historic England has concerns regarding the application on heritage grounds.

We recommend you do not grant consent at this time until the issues raised above have been addressed, in order for the application to meet the requirements of paragraphs 205, 206, 208 and 209 of the NPPF.

Yours sincerely,

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Inspector of Historic Buildings and Areas

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