Draft Glaven Valley Conservation Area Appraisal – Summary of Consultation Responses (consultation period 21 November 2022- 31 March 2023)

Total Written Representations: 27

Full comments received available on request.



PARISH/TOWN COUNCILS		
Summary of Comments / Issues Raised (including page / paragraph number where indicated)	Council Response and Action / Recommendation	
Blakeney PC (ref: PC01)		
 We want the saltmarshes to remain in the Conservation Area, i.e. to continue to enjoy their present level of protection, We wish for the modern housing area on Saxlingham Road to be retained within the protected area, as well as the field, We are also happy to sign up to the coordinated response with other parishes. 	 Agree. These will be retained within the CA. Noted. The modern housing is not considered to make a positive contribution to the character and appearance of the Conservation Area and so will remain excluded. No additional action recommended. 	
Baconsthorpe PC (ref: PC02)		
 Request the Glaven Valley CA be extended as shown in the areas hatched green on the maps attached. Part of this extension is in the Bodham parish boundary. The proposed boundary follows, and includes, New Road from the Parish Boundary with Bodham, just to the west of the communication mast and down to join Allotment Lane and joins the northern Baconsthorpe Conservation Area boundary as its south side. It joins Hall Lane, following the Parish Boundary down to Becketts Farm. It would join the current boundary of the Glaven Conservation Area at Hawksmere, just behind Hempstead Mill. This would then connect the upper Glaven to the present Glaven Valley Conservation Area as also suggested by the River Glaven Conservation Group. 	O Agree. The boundary has been amended to include the proposed areas, based on some of the rationale provided.	
Brinton PC (ref: PC03)		
 Request the extension of the boundary of the GVCA to include the village of Sharrington and its surrounding fields. It is something of an anomaly as to why Sharrington has not been included. Sharrington was 	 Noted/Clarification. Partially agree, The Glaven Valley Conservation Area has been extended to the east and south boundaries of Sharrington Conservation Area (excluding any modern housing around Sharrington and 	

- Request the extension of the boundary of the GVCA to include the village of Sharrington and its surrounding fields. It is something of an anomaly as to why Sharrington has not been included. Sharrington was included in the Glaven Valley Village Conservation Area Appraisals recently undertaken, along with the 10 other villages within the Glaven Valley.
- Sharrington forms part of the setting of the Glaven Valley and its landscape is very much shaped by the river Glaven. The criteria used to define the special interests of the Glaven Valley CA apply equally to Sharrington and its hinterland as it does to the other 10 villages.
- The Swan Inn is also labelled on the map, located north east of the village on the corner of Sharrington Common. This building which exists today is not included in any Conservation area and we request the
- Noted/Clarification. Partially agree, The Glaven Valley Conservation Area has been extended to the east and south boundaries of Sharrington Conservation Area (excluding any modern housing around Sharrington and Thornage) and the Conservation Area has been extended to encompass the tributary and spring near Valley Farm. There is no compelling evidence for the inclusion of the partial field west of Sharrington nor the area north of the A148, which includes partial fields and the poorer quality modern agricultural buildings that would not contribute positively to the Conservation Area.
- Noted/Clarification. The former Swan Inn is an isolated building that has minimal visual connection with the main road today and it is not thought

inclusion of the 'Common' Fields as well as this historic building into the GVCA. Its position on the road towards Holt (today the A148) would have been an important resting place attracting eighteenth century travellers using this primary route.

- We note that in the Glaven Valley Appraisal document that Faden's map of Norfolk is referred to as giving a detailed view of the Glaven at that time, i.e. 1797. The Appraisal document goes on to say that the map shows all the major villages in the area, listing all the villages on the map apart from Sharrington even though Sharrington is highlighted on Faden's map, along with its Common, Church and Sharrington Hall.
- We request that the field area to the north of Brinton, marked M on map 06 should remain within the GVCA.
- A number of the field ponds have survived today and are worthy of protection as they are integral to the heritage and history of the village.
- Area marked in red on the attached map would adjoin the extension proposed by NNDC/Purcell on map 7 of the Glaven Valley Conservation Area proposal which includes Little Thornage and Breck Farm and would therefore be contiguous with the Glaven valley Conservation Area. We also request the reinstatement of fields marked 'L' in Brinton which have previously been in the GVCA but have now been suggested for exclusion.

to contribute significantly to the special interest of the Conservation Area. **No additional action recommended.**

- Noted. Amended. It was originally not included as Sharrington was not within the GVCA. The map shows all the villages of Norfolk.
- Noted. Field M to be retained as part of the extension of GCVA.
- Noted. Unfortunately it is not possible to protect every field pond in the area. No additional action recommended.
- Noted. Following the retention of the villages in the GVCA, the parts marked L are now retained too. Subsequently the addition of Sharrington into the GVCA means the area marked in red is also included in the boundary.

Wiveton PC (ref: PC04)

- Key characteristics include the River Glaven, a nationally important chalk stream, Pasture, wet grassland, marsh, and reed habitats adjoining it, Farmland and mainly deciduous woodland and heath. Villages with flint and pantile buildings, churches, flint walls. Scattered buildings, significant individual houses, mills. Linked by narrow lanes, tracks and paths. A working/living environment for businesses, jobs, and housing. A place for recreation, leisure, and tourism.
- The GVCA should embrace a holistic approach to the Glaven Valley and include wider issues such as the management and conservation of the landscape and the environment in which buildings and settlements sit. There are a number of Rural Conservation Areas elsewhere in the country which take this approach and include settlement and landscape issues as part of their wider contribution to the economy and tourism. These are the attributes which people come to see and enjoy, thereby improving local prosperity.
- Specifically, these Rural Conservation Areas take on a much wider and strategic role: Locally, the Heydon/Salle Conservation Area plan aims

Noted. The remit of the conservation area designation and the subsequent appraisal process is by nature focused largely on the built environment as this is what the designation is intended to protect. The appraisals do discuss the wider environment and setting as far as it contributes to the special interest of the GVCA, however it is beyond the remit of the appraisal process to engage in detailed discussion of environmental measures more broadly.
No additional action recommended.

- to protect the special qualities of the landscapes so that any changes occur in a sympathetic way without harm to the environment.
- The Settle-Carlisle Railway Conservation Area not only aims to protect the physical infrastructure but to conserve/enhance opportunities such as local and regional landmarks in the Yorkshire Dales National Park
- Swaledale and Arkengarthdale Barns and Wall Conservation Area in the Yorkshire Dales National Park. This is aimed at not only the preservation and appearance of traditional farm buildings, but also farmsteads and settlements. It looks at the interrelationship of spaces and key views and, amongst other things, the contribution made by green spaces and their biodiversity value.
- The GVCA document is littered with references to the landscape, manmade and natural. Therefore, the GVCA should have as its context, wider policies such as AONB, SSSIs, Norfolk Ramsar, SPA. This includes NNDC: North Norfolk Landscape Character Assessment as part of the Local Plan. This should be explicitly recognised in writing as a policy context for the management plan. A chapter is needed to rectify this.
- Churches in the GVCA should be included both for their impact on the vistas in and around the Glaven Valley (there are places in Wiveton Parish where 4 of the churches can be seen at once) and as buildings in their own right. The GVCA should have policies to protect/enhance these and their setting in the landscape, in respect of new development and landscape changes. This is an issue for Wiveton Parish Council with the proposed development in front of the Wiveton Bell that will impinge on the vistas of the church and village green. This is a serious omission in the GVCA.
- There are no substantive policies for changes alongside and around the River Glaven e.g. farming, woodland management, hedgerow changes and physical development will have a dramatic impact on the setting of settlements, architecture and buildings. A notable example is Cooks Marsh Barn which is alongside the River Glaven and will visually impact on Wiveton (in addition to Cley in which parish it is located). It is detrimental to the management plan of the approved Wiveton Conservation Area.
- The Quarry at Brecks Farm is being taken out of the GVCA boundary/protection; this then becomes ripe for development which might not be appropriate for the GVCA. It is better included and

 Noted. However, none of the examples cited actually deal with the wider landscape in the management section, likely because the CA designation as a management tool does not offer specific environmental protections, beyond tree works. No additional action recommended.

 Noted. Better referencing to the North Norfolk Landscape Character Assessment has been included within the text of the appraisal.

Clarification. With the retention of the village conservation areas in the GVCA, all the Parish Churches now remain in the boundary too.

- Noted. Only policies relating to planning are enforceable, the appraisal is a
 guidance document which relates primarily to the built environment in its
 wider planning context. It therefore cannot stipulate policies which pertain
 to agri-environment management or stewardship. No additional action
 recommended.
- Noted. The Quarry will now be retained in the GVCA as the point has been made that in time it will cease to be used for quarrying and future use of the site would need to take into account the conservation area designation.

- protected. Whilst not at Wiveton, there will be other examples in the Glaven Valley where there may be pressure for development.
- O Development and redevelopment of agricultural buildings for domestic and commercial uses in the Glaven Valley. An example is the approved hotel on the marsh by the Glaven River which will visually impact on Wiveton, Cooks Marsh Barn. It is also detrimental to the management plan of the approved Wiveton Conservation Area. Over time there will be other proposals which may be inappropriate for the Glaven Valley. The management plan needs to include policies on this.

 Noted/Clarification. Any applications for redevelopment of agricultural buildings into new uses will be assessed according to existing national and local planning policies, on a case by case basis. It is beyond the remit of the conservation area appraisal and management plan to include policies on this.

Stody with Hunworth PC (ref: PC05)

- Stody with Hunworth Parish Council generally welcomes the new GVCA Appraisal, but has some reservations. We recognise that in the overall history of Planning and Conservation in England, Conservation Areas, first established in the 1970s, are a success story.
- The PC appreciates NNDC's move to extend the consultation period, and the setting up of two new Public Meetings on 9th March, in addition to the first Public Meeting in November 2022. Three of our councillors have attended these meetings and reported back to PC Meetings in December last year, and in March 2023.
- The importance of watermills in the history and current look of the GV is emphasised again and again maybe even too much? Hunworth Mill must be one of the most attractive and sensitively "modernised" mills remaining in the GV?
- We question the suggestions that some straightened stretches of the Glaven are retained to demonstrate the moves by previous generations to boost the water supply to mills? In today's challenging natural environment, we think that the health of the river and its water quality, which is enhanced by meanders, is the best option to follow.
- p.9. LH col. Why is the new Stody Village Conservation Area, agreed in early 2022, not included in the list?
- o p.12. RH col. We believe 75mm diameter of tree trunks is too small, and suggest 150mm.

- Noted. The Summary of Special Interest has been amended to reflect other important aspects of the Glaven Valley that contribute to its significance, in addition to the presence of watermills, both former and extant.
- **Noted/Clarification**. Please see below page for comments on river straightening.
- Noted. The map shows what the situation was when the review was begun. A second map has been added to show the situation in 2022 when the village CAs review was complete.
- Clarification. The 75mm diameter is not stipulated by NNDC, it is national planning policy enshrined in The Town and Country Planning (Tree Preservation) (England) Regulations, 2012.

- p. 15 LH col. Thought five mills in GVCA? Glandford, Letheringsett, Thornage, Hunworth & Hempstead?
- o p.15. RH col. Use of word expansive twice
- o p. 18 Mid col. There was no Anglo-Saxon centre of Hunworth around the isolated church.
- NB. Hunworth Hall & barns built late 17thc. Hunworth Mill is 18thc (cf. Liz Waites doc. attached)
- The settlement around Hunworth Green does NOT date from the Middle Ages, but is much later.
- p. 33. Mid col. last sentence does not make sense is it all estate farmlands?
- p.52. LH col. Thought Hunworth Mill now removed from Hunworth CA, into GVCA?
- p.58. Seven Thatched Cottages at Hunworth & Stody surely built between the Wars, not between 1906-50?
- p.72.RH col. Beck Farm, Beck Farm Cottage and Barns are all in parish of Hunworth, not Thornage (although they all have a Holt NR25 postcode)
- p.89. LH col. Retaining straightened sections of River Glaven just above some mills for historical reasons clashes with ecological preference for meanders.
- p.90. RH col. Last para. Some home owners & landlords cannot afford timber frame windows, but agree any uPVC windows should be of "high quality and imitate wooden windows" & doors where possible?
- o p.92. RH col. Can solar panels be placed discretely in back gardens as well as on non-primary elevations?
- p. 93. Mid col. The uPVC windows debate! Whilst not ideal, uPVC windows and doors demonstrate that not all properties are historic and "set in aspic".
- o p.95. RH col. Straight vs meandering rivers again!
- p.122. Stody with Hunworth PC is split on whether Stody Lodge and seven thatched cottages in Hunworth & Stody should be locally listed.
 We are aware that the Stody estate is not keen on this, but most PC members believe the Lodge and thatched cottages have architectural merit, although their style is atypical of the Glaven Valley.
- p.128. Beck Farm, Beck Farm Cottage & Barn are all in parish of Hunworth not Thornage. The PC is relaxed re local listing status for these.

- Noted. Amended.
- Clarification. That is the category given to that area in the Landscape Character Assessment.
- o **Noted.** It has now been removed, subsequently amended.
- Clarification. The time period relates to the historic OS mapping.
- Noted. Amended.
- Clarification. It does not say all straightened sections but some. It is important to retain some of the straightened sections for their heritage value.
- Clarification. It says that the preference for replacement of uPVC windows at the end of their lives is with new timber windows but that if that is not possible, the uPVC windows will be of high quality and closely imitate timber windows as far as is possible.
- O Clarification. The implication is yes.
- Clarification. This is a balanced section that says the ecological and heritage benefits should be weighed up in order to decide what is appropriate and recommends some sections of straightened river are preserved. No additional action recommended.
- Noted/Clarification. Stody Lodge and cottages their atypical style reinforces their being part of an estate and illustrate how large estates often created/influenced the built environment we see today. No additional action recommended.
- Noted. Beck Farm amended.

- o p.132. Heath House, Hunworth Rd, Holt NR25 6SR is in parish of Holt, not Hunworth.
- Noted. Heath House amended.

Thornage PC (ref: PC06)

- The Glaven Valley Conservation Area Appraisal ("GVCAA"), at its seventh draft, should have been in a form that was near finalisation. Certainly, that was the public expectation when the current consultation exercise was quietly commenced on 30th November 2022.
- Concerns both about the timing and length of the consultation period (albeit extended) and the tokenist nature of that exercise, as reflected by the style of presentations at the public meetings and lack of willingness to engage conscientiously in Q&A sessions, including recording the main points.
- While it is appreciated that NNDC has wanted to capture specific views from consultees in written form, the current exercise is the poorer for the perception, if not the fact, that this consultation has not been a truly engaged process. This is reflected by the fact that we have been obliged, because of time constraints, to focus on higher level issues and not on detailed wording concerns revealing the overly desk based exercise undertaken by the authors.
- It also has to be borne in mind that, parallel with the GVCAA's gestation, has been the finalisation of the new draft District Local Plan ("DLP"). We note, and have commented previously, that Policy ENV7 of the DLP is effectively outworked through the new suite of Conservation Area Appraisals ("CAAs"). Therefore, these CAAs are a key development management tool to its outworkings (see Para. 6.7.8) to the extent that Policy ENV7(8) is premised upon the basis that a CAA Management Plan will have adopted development plan status for the purposes of future planning application determinations.
- We note, and have commented previously, that Policy ENV7 of the DLP is effectively outworked through the new suite of Conservation Area Appraisals ("CAAs"). Therefore, these CAAs are a key development management tool to its outworkings (see Para. 6.7.8) to the extent that Policy ENV7(8) is premised upon the basis that a CAA Management Plan will have adopted development plan status for the purposes of future planning application determinations.
- Regrettably, however, the current draft of the GVCAA, now released for public consultation, is not sufficiently "fit for purpose".

- Noted/Clarification. The public consultation exercise is the first opportunity for members of the public and interested parties to have sight of the current draft of the appraisal. To get to this point the document has gone through many iterations, given the size of the designation and the issues raised, the initial drafts involved officers making sure that the document was fit for purpose and could be issued for public consultation purposes.
- Noted/Clarification. Rather than the usual recommended consultation period of six weeks, the consultation exercise in this case was initially extended to eight weeks so as not to clash too much with the festive period, then following feedback was then extended further to a total of nineteen weeks. It involved advertising on NNDC's website, the issuing of press releases, promotion on NNDC social media platforms and within the Outlook magazine that is delivered to all households within the District, contact with all affected Parish Councils and Local Members and the running of public meetings in Holt and Blakeney. The size of the designation would have made a leaflet drop to every household both unfeasible and costly.
- Noted. Conservation Area Appraisals are guidance rather than policy documents. As such, where appraisals exist, they are a material planning consideration and work in support of the emerging Policy EN7(8) rather than outworking it.

- In essence, the GVCAA fails to meet the requirements of Section 69(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 ("the 1990 Act"); for it fails to articulate why those "parts of their area are areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance" (s.69(1)(a).
- The GVCA was designated in 1984 (see p.7) under s.277(1) of the previous Town and Country Planning Act 1971 (as amended).
 However, the designation statement has never been a publicly accessible document, and, the reasons for designation have never been disclosed by NNDC. Nonetheless, as the statutory test was and remains the same, it must have been that the entirety of the designated area included sufficient "areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance".
- Given that the GVCAA is re-justifying these designation reasons as well
 as proposing amendments to the boundaries it needs to state clearly,
 and, with sufficient detail, how the prescribed statutory basis
 continues to apply.
- Accordingly, unless these "special interests" are now properly
 articulated in the GVCAA then there is insufficient justification for
 changing the 1984 designation boundaries given, in effect, the
 removal of a significant level of specific statutory regulation (and
 protection). Simply relying on "good practice", alone, is not enough as
 a justification nor the historic practice of planning officer judgment.
- Where the GVCAA currently fails is that it does not look at the totality
 of the designation area i.e. buildings as well as landscape in their
 overall context the jigsaw picture as a whole with the built elements
 as pieces or sections.
- Concerningly, particularly to this Parish Council the GVCAA still does not identify what makes the GVCA special and why its needs this level of statutory heritage protection. While Section 2 makes an attempt to do so it reads as a bit of a muddle in which these criteria are not clearly articulated. The nearest, albeit subjectively phrased and in need of improved wording, is its final sub-paragraph: "Locals and visitors value the area highly, with people loving the peaceful, rural landscape, heritage interests of the milling industry [Query: what about the churches and other buildings?] and the important ecology of the river. "What is missing is the key "why" factor.

- Noted. Amendments to the text have been made to better articulate the special interest.
- Noted/Clarification. As many of the Council's conservation area designations date back to the 1970s/80s, it is not uncommon for the original reasons for designation to be lost to the annals of time. Indeed, it is only in more recent times that best practice requires the special interest to be properly appraised. 40 years ago, this was not the case.
- o **Noted.** Additional justification has been added within the latest draft.

- **Noted/Clarification.** The original focus on the buildings reflected the fact that conservation areas are primarily about preserving and enhancing the built environment. This said, additional discussion of the landscape has been incorporated into the latest draft.
- Noted/Clarification. Section 2 has now been re-written for the purposes of the latest draft and now better identifies what makes the designation special, including the absence of modern development.

- We suggest that it is the (continuing) visible absence of modern built development (in all forms) and other visually detracting features that, collectively, retain the GVCA's special architectural and historic interest and allow its various special architectural and historic interests to be appreciated, both individually and collectively, in their respective contextual settings.
- Looking further [Query: why?] Section 5.1 (p.70), under the heading
 "Heritage Assets" starts with the assertion "The Glaven Valley
 Conservation Area, a heritage asset in its own right, contains
 numerous individual heritage assets, including both designated and
 non-designated buildings". While agreed, the underlined phrase has
 not been made as a statement nor (necessarily) explained earlier. We
 are advised that this omission must be addressed.
- Further, if the authors are referring to the definition now provided within Annex 2 of the current National Planning Policy Framework (NPPF) (2021) then that needs to be footnoted. We also seek the addition of the word "Specific" in the chapter title, which would assist the reader's understanding of what is being covered.
- There is too lack a focus and too great an emphasis (query: the
 experience of the authors and/or brief given by NNDC officers) on the
 limited remaining built heritage (absent the Village CA) and not the
 totality, even of the significantly reduced whole.
- Even that built heritage focus fails, adequately, to address the
 presence of the various churches, both individually and collectively,
 and their undeveloped rural context. This is exemplified by the ability,
 from a variety of public viewpoints, to see all three or at least two of
 Blakeney, Wiveton and Cley Churches across the Glaven valley.
 Similarly, views of, say, Hunworth Church across open fields, equally
 highlight its historic landmark qualities.
- The current imbalance is evidenced by these "tell tell" indicators:
 (a) the choice of FAQs;
 - (b) the designation section wording of page 10 (middle column);
 - (c) the phrasing of Section 4.6 ("Setting") (p.61);
 - (d) the middle section of page 92 (no Article 4 Directions). These all emphasise "built" heritage and not the wider application, as used in the NPPF's Glossary.
- Indeed, this lack of understanding is highlighted by the proposal that Cley Marshes should be taken out of the GVCA because of other "natural environment designations" (p. 102); but that justification fails

- Clarification. The point of this section is to explain this. Each subsequent subsection articulates the designated and non-designated heritage assets that fall within the CA. The sentence referred to is the introductory summary sentence that introduces the section. With regards to it not being discussed earlier, section 1.3 on p10 does explain that a conservation area is made up of individual buildings and monuments and other features including topography and open spaces.
- Noted/Clarification. A footnote here is not considered necessary. You
 could argue then that footnotes are needed throughout the document
 when the NPPF is referenced at the outset in section 1.
- Noted/Clarification. Heritage Assets is the title of this section in all the other CAAs – unclear what benefit is there in changing it here.
- Noted/Clarification. The contribution of church towers to views is mentioned in both section 4.3.0 Long Range Views and 4.3.2 Shorter Range Views.
- Clarification. The FAQs are the same as previous CAAs. In the interests of consistency so is the wording of the designation section, section on setting, and Article 4 Directions. These all correctly place the emphasis on the built environment for which the conservation area controls primarily relate.
- Noted. The Cley Marshes have now been retained within the Glaven Valley Conservation Area, collectively the feedback received has better illustrated their value as a landscape shaped and managed by people

to recognise the particular statutory protection that is currently given to development related issues through the 1990 Act, which is not provided by reliance on "setting" arguments or the other "natural environment" designations. It also misunderstands "the heritage morphology" that has occurred to the Glaven Valley over the centuries which, while chronicled in this draft GVCAA, fails to address how that morphology is still evident; for it must have been at the time of designation in 1984 so what is the significant change in heritage circumstances?

- It further fails to appreciate the significance of the specific statutory duty under s.72(1) on NNDC to give "special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area." when addressing merits-based planning decisions. That is why the Swaledale CA was made and recognises, despite both its AONB plus National Park statuses as well.
- While the justification for no longer having an overarching GVCA now covering the Village CAs is "to remove an anomaly" (p. 96: middle column) the use of that word is a misnomer and reveals the underlying shortcoming of the current GVCAA. This is compounded by this change being predicated (as well as justified) upon the basis that the issue of setting will address the connectivities between the two CA designations. However, "setting" in its technical sense is not defined. It needs to be; for we are advised that it is a concept that even the Courts have struggled to define as well as Historic England. The GVCAA Glossary (p.120) fails in that regard as well as being out of date.
- Given the desire of the authors still to focus on built heritage it would be simpler, clearer and more certain simply to keep the Village CAs within the current GVCA designated area and only make minimal changes to the boundaries, e.g. around Holt.
- Finally, we are advised that the GVCA statement that NNDC does not deem necessary any Article 4 Directions to unlisted buildings (p.92). The current wording erroneously suggests that Article 4 only applies to built property and not land. The tension, and, perhaps contradiction, that a blanket ban on restricting the use of permitted development rights can, we are advised, and also lead to are detracting visual anomalies of uses and/or materials which would otherwise fail the test of under s.72(1) of the 1990 Act of preservation preserve or enhancement of the character or appearance of the GVCA.

over time, as well as demonstrating their intrinsic link historically between the coast and the inland areas of the Glaven Valley by supporting trade links.

o Clarification. A definition of setting is on p61.

o Clarification. The villages are now retained within the GVCA.

Noted/Clarification. Central Government has made it clear that Local Authorities should consider making Article 4 Directions only in exceptional circumstances. It has also confirmed that there should be a particularly strong justification for the withdrawal of PD rights across a wide area. In this case, there are not considered to be any exceptional circumstances or strong justification to warrant such a withdrawal of PD rights.

- It still uses prescriptive wording and randomly swops between "will be", "will not be" and "should be" (pp.89-90); but as both are only advisory ("Conservation Philosophy" and "Recommendations", raises not just the textural but also the more fundamental question, why?
- As well as sharing the consensus view of other affected Parish Councils
 that the GVCAA is significantly deficient we are regrettably obliged to
 point out that the deficiencies are sufficiently fundamental that a
 comprehensive re-drafting exercise is required if the GVCAA is to have
 true credibility, and, as a development management tool. Accordingly,
 in the wider public interest, we urge NNDC officers and members not
 to progress with the current version and to take careful account of the
 matters raised above.
- Clarification. As well as planning guidance documents, appraisals also have an educative role in terms of outlining best practice and making recommendations on appropriate work. As not all of these areas will be the subject of planning control, it is not always possible to use consistent or categorical language.
- Noted. This feedback has been taken on board and whilst officers do not concur with all of the alleged deficiencies, a significant re-drafting exercise has been undertaken in response.

Cley PC (ref: PC07)

- The salt marshes which forms the northern part of the current conservation area should be retained within the revised GVCA. These developed as a result of the embankments built by Sir Henry Calthorpe in 1687 and Van Hasedunck in 1649, which both reduced the scour of the Glaven estuary, and permitted the silting up of the Glaven and created the Salt Marshes. The marshes are therefore a historical artefact created by manipulating waterways (similar to that which created Selbrigg Pond), making them heritage assets. They are also part of the setting of the Glaven Ports and villages.
- AONB designation differs from that of Conservation Areas, and lacks the statutory protection that can only be given to development issues through the 1990 Planning (Listed Buildings and Conservation Areas) Act 1990.
- Article 4 directions should be applied to unlisted buildings removing permitted development rights.
- The Glaven Valley villages should remain within the GVCA as they are integral to the landscape in terms of key views and vistas. They are the backbone on which the valley wealth depended. There would be no heritage and therefore no need for a conservation area without them. It's the interplay between the built heritage and the natural form that creates the rural conservation area. The removal of the villages ignores the connectivity between the conservation areas and their settings.
- The car park east of Cley is located on the far southern tip of the original Cley Hall woodlands. It should be retained with the Valley Conservation area to give it the protection it deserves. Especial concern is expressed regarding the surrounding trees. Had the

Agree. The villages and salt marshes have now been included in the boundary, see earlier comments for more detail.

- Noted. Article 4 Directions are not being pursued at this time, please see earlier comment for further detail.
- o Agree. The villages have now been retained in the GVCA.

 Noted. This area of land was an anomaly in the boundary, and is not considered to contribute to the special interest of the conservation area.
 No additional action recommended. prospect of its removal from the GVCA been raised at the time the village conservation area was reviewed, the community would have objected, but at the time it was felt this land was protected through its inclusion in the GVCA.

INTERESTED PARTIES

River Glaven Conservation Group (ref: IP01)

Summary of Comments / Issues Raised (including page / paragraph number where indicated)

Council Response and Action / Recommendation

Commend the depth and detail of text, and use of photographs. Our principle interest lies in the proposed boundary changes, focused on the extensions, but we have also looked carefully at those areas to be excluded.

- We start with the exclusions, and we say we find the reasons for their deletion to be convincing, with near all the outcome of residential encroachment. The exceptions are a quarry and two others which we would define as technical planning matters, at Stody and the Salt Marshes areas.
- We note a more general theme, threaded in a few places in the document, explicit at Chapter 6, paragraph 6.3 page 64; "Man Made Versus Natural River", and the lack of discussion by the 'natural river' organisations. The RGCG feel this requires a separate two page document, and while not part of the RGCG response to the GVCA consultation, should sit alongside for future discussion.
- There is one major omission from the document which is in the Appendix C schedule of all listed Heritage Assets. While all the buildings in Glandford are now shown, those for Letheringsett and Little Thornage are now 'lost'. The Letheringsett with Glandford Parish Council have written to request the re-instatement of these listed buildings as were shown in the March 2021 consultation, to which they gave a detailed response.

Proposed GVCA Boundary Extensions

• Selbrigg Pond & Red House: boundary extension welcomed. Document identifies Baconsthorpe Castle as the source of the river, just 200 meters upstream. We suggest that there is a good case for going beyond the proposal as it stands to embrace the river and the flanks as far as the Castle, a SAM. We consider this is worthy in landscape

- Noted/Clarification. Such a standalone document falls outside of the remit
 of the conservation area appraisal process. Hence, it is not something that
 the Local Planning Authority would be able to take forward at this time.
- Clarification. Only the heritage assets that sit solely within the Glaven Valley Conservation Area have been shown, due to the scale of the area. For the heritage assets within the individual village Conservation Areas, please refer to the village specific Conservation Area Appraisals. In the case of Letheringsett and Little Thornage all the heritage assets sit within the village boundaries.

- terms, but also the number of connected footpaths. This is the only sizeable area in the whole Glaven system where this exists.
- The broad area starts at Selbrigg Pong and clockwise would be bounded by Snow Hill, Church Farmhouse, West Beckham Church and the footpaths which pass through the centre of Baconsthorpe Wood, Baconsthorpe Castle, Hall Lane, and Becketts Farm to return to Selbrigg Pond. The whole area has seen little development, and retains much feeling of an old and relatively unspoilt landscape. There are valuable pieces of ancient woodland, and to some tracks bounded on both sides by the number of species of bush and tree edging, with flora characteristic of old woodland.
- Hempstead Hall & Green Farm: Support, but also suggest some further additions. The stretch which runs from Hall Cottage to just short of the river, and at that point looks across to Holt Lowes, SAC. A small but strong stream follows this alignment to enter the main river, but why not include this further small areas to the main river facing Holt Lowes. In addition the land is bounded by Moreclose Plantation and the river makes a very attractive area. The landowner is Green Farm, and with permission could be accessed opposite Hempstead Mill.
- Brinton & South of Thornage: we note the areas of exclusion at Brinton. Also the small area to the south of Thornage which lies between the B110, the lane to Kendles and Jahne Track; both these are not in the Brinton or Thornage Conservation Area, and as such to be deleted. The remaining partial area is proposed for inclusion and is part of the 07 Breck Farm area at the southern end.
- Breck Farm (just of the A148): This is the largest area proposed for extension of the current GVCA boundary. The RGCG is delighted to see this proposal. In addition to being a valuable landscape, it also indirectly reflects of the historic importance of the crossroads as being a staging post of the east-west medieval route across the Glaven at Little Thornage Ford for travelers and pilgrims, and no doubt also north-south from the Glaven Ports to settlements inland.
- Lawn Farm: The RGCG are supportive of this extension; but suggest
 that there is a case for extending further. It could also embrace the
 Lowes drainage and wetland area, and the lake at Green Plantation. It
 might be noted that the land abuts the Holt Hall land, 83 acres, which
 has wetland and a tributary.
- Holt: There a number of areas proposed for exclusion due to encroaching development, principally residential, which also applies to

 Noted. The area is similar to that proposed by Baconsthorpe PC, some of which has now been incorporated into the new boundary. Some areas suggested are not appropriate as the additions would be fields, a track and a disused pit. Blakeney at Saxlingham Road, and part of Cley car park. Holt has four areas for exclusion, but one extension RGCG supports. This is to south of Holt, an oblong block of fields. It will act as a buffer to development spreading to the boundary of Holt Country Park.

Friends of North Norfolk (ref: IP02)

- The key characteristics have to be the views, both outward and inward. In recent times there have been a few unfortunate developments that have impacted these in the Glaven Valley. In all cases the threat and ability of the applicant to go to appeal have made it difficult and expensive for the Local Authority to resist these developments. It would be useful if there were to be a source of funding support available to NNDC in such cases within Conservation Areas.
- On page 86, the dramatic prediction for the Glaven to become tidal as far as Bayfield Lake is lightly skipped over, not making it clear whether this would come about by a managed process or the more likely catastrophic collapse of the sea bank that currently protects it. As Flood Warden for the village of Wiveton this is an obvious concern as a breach would not just make the Glaven tidal as far as Bayfield Lake, but potentially so significant damage to part of the Cley and Wiveton Conservation Areas.
- Page 96. There are a few suggestions for unacceptable changes which are perhaps more hopes that implementable actions. For example that the enlargement of field boundaries should be discouraged, where there are no mechanisms by which such hopes might be achieved.
- Clarification. All of this is from the North Norfolk AONB Climate Action Plan, accessed in 2018 and which is no longer available online. The point of Bayfield Lake is also made in a Norfolk Rivers Trust document (2.5 on p8) https://norfolkriverstrust.org/wp-content/uploads/2018/07/Glaven-Catchment-Outreach-Report-NGP-2014-min.pdf
- Noted. The management proposals are intended to be 'best practice' guidance in most cases, this recognises that it won't always be possible but should be the aim where possible in order to protect the special interest of the Conservation Area.

Sharrington Village Hall Management Committee (ref: IP03)

- I refer to our website where the late Peter Chapman, a resident of the village, posted a very comprehensive history of Sharrington. His research quoted the Domesday Book reference to Sharrington having 9 smallholders before 1086 and holdings over double that thereafter.
- We can record 7 'historical' farms in the village, of which four can be traced to larger estate ownership.
- I submit that Sharrington forms a sufficient historical link to land usage in the River Glaven catchment area and should be included in the Glaven valley conservation area.

 Noted. See above responses, Sharrington is now within the GVCA boundary.

NCC Mineral Planning Authority (ref: IP04)

- The Mineral Planning Authority notes the intention to amend the boundary of the Conservation Area to remove the area of the permitted mineral working at Breck Farm, Stody (your reference H). The plan shown in the review consultation does not show the mineral working as it is currently permitted.
- An additional area of land to the northwest known as Pinkney's Field was permitted on 15 August 2019. I have attached the decision notice for this permission (C/1/2018/1016), together with the red line plan. As with the adjacent mineral working the approved restoration is to provide an agricultural reservoir to assist the farming enterprise and reduce the reliance on summer abstraction.
- **Noted.** The Quarry is now being retained in response to request from parish council.

PFA Coastal Ward Member (ref: IP05)

- The GVCAA fails to meet the requirements of Section 69(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 ("the 1990 Act"); for it fails to articulate why those "parts of their area are areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance" (s.69(1)(a), thereby warranting the additional general duty placed upon NNDC, as local planning authority, and, resulting level of statutory protection given by Section 72(1) of the 1990 Act (see further below).
- Furthermore, as the current GVCAA proposes changes to the current GVCA boundary that exercise is now unsound; for it worryingly leaves open to question whether the correct statutory yardstick has been applied.
- Rural CAs are a rare phenomenon and no specific list is publicly accessible. Nevertheless, what is clear from the seven we have identified is that each is unique. Most significantly, and, where the GVCAA currently fails is that it does not look at the totality of the designation area i.e. buildings as well as landscape in their overall context the jigsaw picture as a whole with the built elements as pieces or sections.
- The proposal that Cley Marshes should be taken out of the GVCA because of other "natural environment designations" (p. 102); but that justification fails to recognise the particular statutory protection that is

Noted. As outlined above, the document has been re-drafted to more clearly articulate the special interest.

- Clarification. Rural CAs are rare because the additional controls introduced through designation primarily relate to the built environment. This said, the latest draft does give greater weight to the contribution made by the wider landscape.
- **Noted.** See above for reasoning behind the proposal to now retain the marshes.

currently and can only given to development related issues through the 1990 Act, which is not provided by reliance on "setting" arguments or the other "natural environment" designations. It also misunderstands "the heritage morphology" that has occurred to the Glaven Valley over the centuries which, while chronicled in this draft GVCAA, fails to address how that morphology is still evident; for it must have been at the time of designation in 1984 so what is the significant change in heritage circumstances?

- Given the desire of the authors still to focus on built heritage it would be simpler, clearer and more certain simply to keep the Village CAs within the current GVCA designated area and only make minimal changes to the boundaries, e.g. around Holt.
- Finally, we are advised that the GVCA statement that NNDC does not deem necessary any Article 4 Directions to unlisted buildings (p.92) removing permitted development rights raises the following concerns which we believe have, already, lead to the "law of unforeseen consequences i.e. issues which could have been avoided if a less prescriptive approach had been taken to this issue. (1) First, the current wording erroneously suggests that Article 4 only applies to built property and not land. 2) The tension, and, perhaps contradiction, that a blanket ban on restricting the use of permitted development rights can, we are advised, and also lead to are detracting visual anomalies of uses and/or materials which would otherwise fail the test of under s.72(1) of the 1990 Act of preservation preserve or enhancement of the character or appearance of the GVCA.
- Rather, there is too lack a focus and too great an emphasis (query: the
 experience of the authors and/or brief given by NNDC officers) on the
 limited remaining built heritage (absent the Village CA) and not the
 totality, even of the significantly reduced whole.

Noted. This has been actioned.

Noted/Clarification. Please refer to earlier response to the use of Article 4
 Directions. No additional action recommended.

• Noted. Please refer to earlier response regarding the focus on built heritage (p.8).

PUBLIC COMMENTS		
Summary of Comments / Issues Raised	Council Response and Action / Recommendation	
(including page / paragraph number where indicated)		
Anonymous (ref: A01)		
 It would appear the cartographer data and environmental data group that the Glaven Valley area has been taken by you from the wetland shaded maps of ordnance and accordingly then if this is the case then only anything that falls within that map area will apply as the area is designated by you. This then leads me to suppose that all matters applying to trees, grasses, resident animals, grasses and wildflowers are the basis upon which you justify the areas you have designated as being within the GVCA and anything that doesn't fall within that area is of no consequence. Property dates in Sharrington known to some of us do not follow Purcell's findings as I know for a fact of a farm which dates 16th/17th century and adding this to many other buildings, monuments, church, pilgrim cross must mean Sharrington falls into the category of inclusion in the GVCA. Historical buildings you state are part of the GVCA, as you state various places and villages i.e. Stody, that conform to this aspect of your plans that to date you have presented. Some of these villages you state are already designated conservation villages however, because you state they are already categorized in that type of conservation there is no need to place them in the GVCA plan. Consider that the management proposals are not appropriate and should be sent back to the drawing board. I have considered the archaeological aspect of the area you are defining, we have not protected this area properly. We have the pilgrim's route, make sure these areas are protected by GVCA standards. 	 Noted/Clarification. The nature of conservation areas is that they rely on definite boundary lines. Whilst this may not necessarily suit the more transient nature of marshland, the boundary must be confined to the area around the mouth of the Glaven for it to have relevance and meaning in a planning context. Noted. The building in question has not been divulged, and no evidence has been provided that demonstrates the date given by Purcell is inaccurate. As such no change can be made. Noted. The villages have now been retained in the GVCA so retain both designations. Noted. The reasons which underpin this statement have not been clarified. However, the management proposals are similar to previous appraisals already carried out and adopted, and are based on the findings of the appraisal. Noted. Known archaeology is discussed in the appraisal, some of which benefits from Scheduled Ancient Monument protection. 	
Anonymous (ref: A02)		
We wonder why residents whose homes are proposed for exclusion from the Conservation Area have not been informed directly. Surely it is crucial to proactively canvas their opinions. Not taking into account the views and	 Noted. In order to try and capture as many viewpoints as possible, the consultation was advertised via the NNDC website, the issuing of press releases, promotion on NNDC social media platforms and 	

validity of the exercise.
Don't consider the management proposals are appropriate, we live within the area of Holt designated as "Holt II" on the boundary map in section

wishes of all affected stakeholders potentially diminishes the democratic

the consultation was advertised via the NNDC website, the issuing of press releases, promotion on NNDC social media platforms and within the Outlook magazine that is delivered to all households within the District, contact with all affected Parish Councils and Local Members and the running of public meetings in Holt and Blakeney. The size of the designation would have made a leaflet

- 7.3.8. We are very disappointed that the homes here are described as "...modern housing of average quality..." and "proposed for removal from the Glaven Valley CA..."
- We challenge this assessment. The homes in Winns Close in particular are a (probably) unique enclave of exceptionally well cared for bungalows maintained to a high standard throughout. We believe that this is in no small part as a consequence of their inclusion in the conservation area. We believe that the protection offered by inclusion within the conservation area is important, and cannot understand any proposal to remove this protection. Surely more protection is better than less.
- Accordingly we strongly object to removal of homes in Winns Close from the conservation area and request that they continue to be included within its boundary.

- drop to every household both unfeasible and costly. Given the scale of the area, we have to recognise that there will be people who are not aware, which is why word of mouth also plays an important role in spreading awareness.
- Noted/Clarification. In order to ensure that conservation areas remain relevant and fit for purpose, appraisals are obliged to identify land or buildings which do not make a contribution to the special historic or architectural interest of the designation. This is not a judgement on the condition or management of these sites, it is simply an objective assessment of whether a particular building or area is deserving of inclusion or whether it devalues the currency of conservation. No additional action recommended.

Anonymous (ref: A03)

- o It seems the publicity related to this has been woefully inadequate.
- The document is very difficult to follow and needs a complete revamp to make it simpler and clearer.
- Changes to the boundaries of the conservation area often lack a rationale.
 For example, it is not clear why Cley car park is now partly excluded. Why have there been changes to the boundaries in Cley?
- The whole area of the coastal strip covering the Blakeney Fresh Marshes and the Cley Bird Reserve has now been excluded. The rationale for this is not clear.

- Noted. Please see above comments regarding the advertising of the consultation.
- Noted. The document itself follows the same form as the previously adopted appraisals have, which includes Holt, Baconsthorpe, Wells, Cley and Blakeney among others, the format of which has been commended by Historic England. To change this now would be inconsistent with the approach taken so far.
- Noted/Clarification. With regard to Cley car park, only part of the car park and part of the Hall were within the boundary originally, likely an anomaly as it is not best practice to cut through a building or area, as such this area was removed from the Cley Conservation Area and should now also be removed from the Glaven Valley Conservation Area as it would no longer be contiguous with the revised boundary.
- Noted/ Clarification. The area including the Saltmarshes has now been retained within the GVCA boundary.

Anonymous (ref: A04)

- I would like to draw your attention to the mill once located in Lower Sharrington, the area between Brinton and Sharrington on a tributary to the River Glaven.
- The current draft of the GVCA excludes this area but it is of historical importance. Furthermore it strengthens the need to reinstate the village of Sharrington into the conservation area and to include the field 'M' of map 6,
- **Noted.** Sharrington, along with the other Glaven Valley Villages has now been included within the GVCA boundary.

- page 107; a catchment of the River Glaven from the historic Valley Farm field.
- The excellent North Norfolk Landscape Character Assessment, 2018 Final draft, comprehensively sets out the need to conserve this unique landscape. However, the draft 'GLAVEN Valley Conservation Area' (GVCA only attributes 'endnote no.50' to this document. The document itself quotes: "1.11 this report can be used to consider landscape character when planning any type of change......" Yet nowhere else in the GVCA draft is reference made to this document which shows far better suggested boundary lines to the proposed conservation area, especially using contour lines to encapsulate the valley.

Noted. The draft appraisal has been amended to make better reference to the North Norfolk Landscape Character Assessment. The two documents are intended to complement each other as planning tools, rather than repeat the same information; although they are complementary, they focus on different aspects of the Glaven Valley but do have some crossover. The Conservation Area is primarily a built heritage designation, which is reflected in the appraisal, where the Landscape Character Assessment is by nature more focused on landscape and environmental issues.

Anonymous (ref: A05)

- We request that comments are read by the Committee in conjunction with the Parish Council submission.
- We can only assume the omission of Sharrington from the GVCA is an oversight, we were astonished to discover it is not.
- Don't think management proposals are appropriate as they make no mention of Sharrington and surrounding fields. Excluding Sharrington and surrounding area from its rightful place within the Glaven Valley will be a travesty for future generations.

 Noted. Sharrington has now been included within the GVCA boundary.

Anonymous (ref: A06)

- There are plenty of good things in these proposals, but I, for one need to understand why the review, and the changes proposed therein, are really necessary. As with the village review there is a real danger that overzealous enthusiasm could lead to a policy that would end up freezing the area in time.
- I am totally in favour of recognizing the history and how things have developed in the past, but the reason the Glaven Valley is of interest now, is because it has been sensitively developed, over time, to meet the modern requisites for agriculture, housing, tourism, forestry, environmental goals and even entrepreneurial living. This has been achieved by those who actually live and work there, acting within the framework of planning regulations existing at the time. Too much further restrictions will lead to mothballing the very area which this review is trying to protect.
- The level of importance given to mills seems to be disproportionately great:
 a) The Glaven is not unique- there were mills on lots of other rivers
- Clarification. Local Authorities are required to regularly review and publish management proposals for conservation areas within their jurisdiction. The Glaven Valley and the village Conservation Areas were earmarked several years ago as priority cases due to their sensitivity to development pressure as well as their early designation date. Many of the Conservation Areas within North Norfolk have never been reviewed since they were designated, and certainly do not have any form of appraisal to help understand why there were originally designated. In order to successfully manage change within the conservation areas, we have to understand what the special interest is. The appraisal process allows a thorough understanding of why the conservation areas were worthy of designation in the first place, as well as setting out proposals for how best to maintain that special interest well into the future.
- Noted. The Glaven may not be unique in having had several mills along its length, however, the volume of mills concentrated in a

- b) it is surprising to read of the importance that they (heritage minded people) are attaching to preserving the straight parts of the river. It is difficult to see where this fits with the Environment Agency's wish to see the river restored to its original meandering, with 'ripples and rills', as had to be carried out on the stretch outside Hunworth, at considerable expense, as mitigation for giving Stody Estate permission to build a reservoir c) it is even more difficult to see how it fits beside the Norfolk Rivers/Environmental Agency's enthusiasm to introduce Beavers which will not only completely change the character of the Glaven River valley and local landscape but also destroy many of the mature trees along its banks.
- The proposal that where there are existing buildings etc. that do not fit into the stated vernacular, these should be got rid of is somewhat concerning.
 What about functionality on working farms or modernisation of homes.
- The suggested default position of not allowing the removal of mature trees on any planning application is really concerning and will simply add more cost and bureaucracy to an already over regulated system. There are hundreds of mature trees along the Glaven Valley, many planted by the owners of the land on which they sit. If one or two are in a place that interferes with sensible proposed development, either residential or business, that stipulation becomes an unnecessarily onerous restriction.
- Reference is made to existing views across the countryside needing to be preserved. Is it proposed to restrict farmers/landowners or residents from planting new trees or woods that might alter these view? The landscape has evolved over years and must be allowed to continue to do so. The normal planning rules have done a perfectly good job so far. What about people wishing to put in solar panels either on their roofs or beside their houses or businesses?
- I have always failed to understand why the section that takes in Stody Lodge and runs up to the edge of Briston was added in, on one of the past reviews. This latest assessment clearly states that neither the Lodge nor the thatched cottages are of the same vernacular that are considered typical of the look that this Review is seeking preserve. The buildings are relatively modern and quite a way from the Glaven, the woods dense and mainly confers and the surrounding countryside uncharacteristically flat for the Glaven Valley. I think the boundary of the GVCA should be brought back to the proposed Heritage boundary of Hunworth.
- Protection against large modern housing estates in this area are welcomed but it is good to see that it is recognised that there could be small clusters of new housing on the edge of villages – albeit in the right vernacular. These

- relatively short stretch is noteworthy and is a characteristic feature of the area contributing to way the landscape has historically been manipulated by people, including straightening sections of the river in association with creating the mills. Although the presence of mills is not the only distinctive feature of the Glaven Valley Conservation Area, and the appraisal has been amended to reflect other aspects that contribute to its special interest. Please also refer to earlier discussion of re-meandering straightened sections of the river.
- Clarification. The Appraisal seeks to define what is important about the character and appearance of a defined area and to identify its important characteristics. It is also a vital tool to enable the active management of the conservation area. The management proposals are intended to reflect best practice guidance, but they are not rigid policies, they recognise that best practice is not always possible, for a variety of reasons.
- Clarification. Tree works as part of any planning application are assessed on a case by case basis, but as above, the management proposals set out best practice approaches, which are not always possible to achieve, but the proposals present a baseline to work from.
- Noted/Clarification. Particularly important/key views should be protected as far as is possible, the conservation area designation is not intended to stand in the way of change, but to minimise the potential for harm to the character and appearance of the area.
- Clarification. Stody Lodge and the cottages their atypical style reinforces their being part of an estate and illustrate how large estates often created/influenced the built environment we see today. They may not be particularly old in building terms, however, this does not diminish the value they contribute to the character of the area. Richness and variety often enhance CAs, it is not always about sameness and uniformity.
- Clarification. The area that takes in Stody Lodge was already part of the Glaven Valley Conservation Area, this is the first full review of the designation.

- are much needed to keep the villages alive and provide housing that local working people can afford to live in. There are many who do not want to live on housing estates.
- Recognition that efforts to convert and save existing old barns should be encouraged is a positive, however it should not stifle entrepreneurial use by prohibiting the odd modern building to be sensitively incorporated if that is what is required for the development to work.
- The same comments that were made by the Parish Council for the Hunworth and Stody Heritage review should apply – that the area must be allowed to move with the times and not become mothballed by over expensive or unnecessarily stringent restrictions.

 Noted. The Conservation Area designation is not a means of preserving everything in aspic and preventing change. Instead it is about ensuring that change is managed appropriately given the sensitivities of the area.

Anonymous (ref: A07)

- The evidence of Medieval pilgrims travelling through Little Thornage supports the local intelligence in Sharrington that suggests the ancient, restored cross in Bale Road (Grid Reference: TG 03131 36675 and listed monument) was a resting place and 'way marker' for Walsingham pilgrims.
- Although Domesday of 1086 does not record a church on Bale Road, research suggests that a place of worship could have been on the site of the current church. However there is a medieval church at Thornage which is en route from Little Thornage to Sharrington.
- Without further historical research documentation cannot currently be produced to further support the theory that Sharrington was indeed part of the 'Long Water Walsingham Way' but the possibility cannot be ignored and further supports the inclusion of the village in the Glaven Valley Conservation Area.

 Noted. The appraisal document has been amended to make mention of the medieval cross and the possible pilgrims route through Sharrington.

Anonymous (ref: A08)

- Stody Estate is a family business which has a proven track record, over generations, of preserving and enhancing both its built heritage and surrounding environment.
- Our primary ask is to remove the area hatched orange in the attached from this Conservation Area. This area is entirely owned by Stody Estate, the vast majority of it is not built heritage but arable fields, managed woodland, grass and environmental stewardship. This area includes our main farm yard and accompanying reservoirs and quarry. The few houses and buildings within this area are all owned and managed by us, already in a highly sensitive way, with no holiday lets and the houses provide for local working families and colleagues on the Estate.
- Noted. Conservation area appraisals exist to objectively assess what makes a particular area special. They do not pass subjective judgement on the way land and buildings have been managed over time.
- Noted. As above, decisions on whether a particular piece of land or building is included within a Conservation Area must be based objectively upon their special interest and contribution to that particular area. They cannot be influenced by the way holdings are managed at any one point in time, however good that stewardship may be.

- Stody Lodge, South Lodges and Thatched Cottages are all owned by the Estate and mostly lived in by Estate workers. They are also managed and maintained very sensitively and we don't see any possible justification, reason or benefit to locally list them. As per our discussions, I'm told the only reason to local list them is "to recognise them" however why can't this be achieved by simple text in this re-appraisal document?
- As per the village reviews, our remaining comments and concerns centre around the Draconian and very restrictive language being used to stop sensible new development and deliver energy efficient and affordable housing.
- P12- 3rd column, end of 1st para; ADD "Agricultural holdings are exempt when they have long term Forestry Commission Management Plans and licenses"
- P82- DISAGREE that uPVc is a "significant threat" to individual buildings and the Conservation area. This is far too strong. uPVC is entirely suitable in non-listed buildings, delivering much required energy efficiency and carbon neutral homes/buildings. There are also modern forms of timber-looking but non timber windows that would not be detrimental to heritage and enable much needed cost and energy efficiency.
- Pls remove "uPVC should not be used in historic buildings and are undesirable on modern buildings". Solar panels can only go on south facing roofs and residents should therefore be able to add them, even if road facing.
- P89- Remove "new development should be the minimum necessary to meet the required demands for housing"
- Remove "agricultural buildings will be built with reference to traditional materials and forms". This is completely impractical, modern crop stores have extremely strict hygiene and food safety standards that require modern materials.

 Noted/Clarification. Stody Lodge and cottages – these are characterful buildings which compare favourably against our adopted local listing criteria. Their atypical style reinforces their being part of an estate and illustrate how large estates often created/influenced the built environment we see today. No additional action recommended.

- Noted. This will be added into the text.
- Clarification. The appraisal states a preference for replacement of uPVC windows at the end of their lives with new timber windows but that if that is not possible, the uPVC windows should be of high quality and closely imitate timber windows as far as is possible.
- Noted/Clarification. When read in context, the appraisal outlines the reasons why uPVC is not well suited to historic buildings. These relate to the loss of historic fabric, aesthetic deficiencies and the impact on breathability. The appraisal therefore makes the case for building conservation being considered alongside energy conservation to ensure that alterations do not negatively impact the conservation area. Cumulatively over time, changes to traditional fenestration can have a negative impact on the character and appearance of an area.
- Noted. As has been noted by others, the relative absence of modern development within the Glaven Valley is one of its defining characteristics. Hence, in order to prevent possible harm occurring, it is considered important that development is commensurate with the area and does not exceed the minimum necessary to meet local demand.
- Noted. Change 'will be' for 'should be' it already says "as far as possible" i.e. not where it conflicts with H&S.

- P90- remove uPVC condition that they should be replaced with timber windows. See earlier points re modern timber looking windows and energy/cost efficiency.
- P91- We DISAGREE that "Any change in the Conservation Area or close to it will require assessment (i.e. a Heritage Impact Assessment.) This is far too strong a restriction
- 3rd column, 1st para Pls replace "Advice is usually given" with "Advice might, but is not compulsory, be given...." Given our own extensive knowledge and experience we should be allowed to continue to do our own Heritage Impact Assessment and not require expensive consultants.
- P93- This significantly undervalues the carbon impact of having leaky windows/houses/buildings vs "embodied whole house carbon". The former is MUCH greater than the latter and so again we ask that for non-listed houses/buildings, a far more flexible approach to energy efficiency (timber-looking) is allowed.
- There is also a very important distinction to make that not every house/building in the Conservation is "historic". Most aren't and should therefore be allowed to take advantage of renewables and modern building materials to achieve the Govt legislated target of carbon neutral.
- P94- There has NOT been a trend to create larger fields recently, the
 opposite is true, we have planted miles of hedges, as is evidenced when you
 compare the Glaven Valley to Cambridgeshire.
- Remove "only individual new buildings are likely to be appropriate". There
 ARE opportunities for small scale, sustainable housing developments on
 villages other than just Holt and Blakeney. These will be an important part
 of keeping these villages ALIVE, sustainable and meeting vital housing
 demand. At the moment Hunworth and Stody are completely unaffordable
 for non-ABs to live in other than rent from Stody Estate!
- Remove "New development should be of the same or lesser scale and massing of the buildings around it"
- Remove "If new development areas are required, these are most likely to be appropriate on the peripheries of the larger settlements of Blakeney and Holt"

- Noted. See above discussion with regard to uPVC. Change 'if this isn't possible' to 'Where this is not possible or reasonable'.
- Clarification. The impact assessment need not be a standalone document but just a paragraph in a DAS, depending on the scale of the works, and the significance of the building.
- o **Noted.** Change to 'is often, but not always' or similar.
- Noted. In practice, this is a nuanced issue in which energy conservation and building conservation are both important considerations- ideally both can be combined together harmoniously. Invariably, however, within a conservation area appraisal, the emphasis will tend to be placed upon building conservation. This said, with the Council having declared a Climate Emergency, weight is increasingly being given to reducing carbon and fossil fuel dependency. Hence, it is acknowledged that balances do need to be struck.
- Noted. In practice, decisions are made on a case-by-case basis with more recent buildings likely to be less sensitive to change.
- Noted/Clarification. Whilst this is certainly true in localized areas, the map on P46 shows a more general trend for hedgerows and field boundaries being removed.
- **Clarification** Read in context the paragraph begins with: 'Any new development should respect the character of the immediate part of the Conservation Area in which it is proposed, in order to preserve the differentiation between areas within the Conservation Area and so preserve the diversity of the Conservation Area as a whole.' The appraisal has to reflect the wider policy context in which development needs to be sustainable and directed towards existing population centres with a particular level of service.

Anonymous (ref: A09)

- Request the extension of GVCA boundary to include a number of important fields and buildings in and around the village of Sharrington. Sharrington has several tributaries which flow and feed the Glaven which gave rise to an agricultural industry which is still ongoing; weaving and milling. These
- Noted. See above for more detailed discussion, but Sharrington has now been included within the GVCA.

- industries helped feed the coastal trade in the Glaven Valley with its exports via the Glaven ports.
- Sheep are still grazed in the village and surrounding fields today.
 Sharrington has several historic buildings, including farmhouses and the Hall, whose estate played a key role in the ownership and management of the land in and around the village.
- Sharrington has many heritage assets; the pilgrims cross, high church tower which is visible with clear views across the agricultural land.

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Anonymous (ref: A010)

 Having read through the Brinton Parish Council submission several times I find that a compelling case has been made to include Sharrington in the Glaven Valley Conservation Area.

Noted. See above.

Anonymous (ref: A011)

- "The remnants of the Anglo-Saxon settlement continue to form the northwest end of the village with the proximity of the church and hall of particular importance. The settlement around the green is likely early medieval and reflects common relocation of the village centre"
- I noted the statement on page 15/111 that 'The history of Hunworth appears not to be well-researched'. I consider my 15 years of research justify my comments and corrections to the draft document. Hunworth has a massive archive in the Norfolk Record Office and the British Library. It is one of a small minority of villages having a complete manorial record from the first records post Conquest.
- I would question the inclusion of the hall as a feature of Anglo-Saxon settlement. The church is Anglo Saxon. The hall was built in 1700. The only link between these buildings is their physical proximity. Underlying this linkage is the classic mis-assumption that in medieval times, the manorial hall was always to be found close to the church as an indication of the close link between landed and religious power. Hunworth's land was held by at least seven different manors: there was no manorial hall until 1700.
- O When the Bacon family bought the local manors from de Bozom, they conducted an intensive survey of all land in the manor. I transcribed this document and analysed the field use as a basis for my comparative study of agriculture in Hunworth between the C16 and c18. There is no reference to a Village Green in that document. I would therefore question the assumption that Hunworth's Village Green is of medieval or even Early

Noted. We will be going back to Purcell in due course on some of the historical detail to ensure its accuracy. But beyond the correction of factual inaccuracies, whilst some of the information shared here provides helpful historical background and is welcomed, appraisals can only ever provide an overview of the history of the village. In the interests of limiting length, they cannot be exhaustive/detailed accounts of local personalities and events. This is particularly true of the Glaven Valley appraisal as within it are several settlements which all have their own extensive appraisals in place which do go into more detail than it is possible to do for the wider area.

- Modern heritage. Again, underlying these statements there appears to be another mis-assumption that all villages had a village green.
- Page 3- It is a shame that this discussion of the significance of the landscape and its link with past and current agricultural practice is so brief. The main agricultural system was in the medieval and early modern period that of sheep/corn farming. Refer. The current farming system of the Stody Estate has many parallels with the historic land management practices. This farming system was based on large open fields on which flocks of sheep were rotated with corn. Such an agricultural system did not require many labourers; hence the small number of households and houses in this area.
- "Hunworth exists because it was located at the confluence of two rivers, as reflected in its name" I don't understand this statement as I only know of one river in Hunworth: the Glaven and had always understood that its name was based on the value of a single Hun
- Section 3.1- From my reading of this section, there appears to be a misunderstanding of the nature of the Domesday survey. It was not a census and did not record households. It was based on landholders and their ability to contribute to the King's military security. It was not primarily interested in the nature of the land and therefore is not a good source for the study of the landscape. Households should be replaced with Landholders.
- The King owned all the land in England and all roads were the Kings roads.
 In many manorial documents one will find references to the regia via. The sentence speculating on the link between the King and the naming of one road in Hunworth should ideally be deleted.
- Although the history of Hunworth has not been updated since that of Alan Lambert, there is a wealth of historical source material in the Norfolk Record Office to which I can find very little reference in this section.
- "The Povere family, who were of French origin, owned Hunworth in the twelfth century, before it passed to the De Briston family. The De Stodeys held Hunworth in the early-fourteenth century, the Braunch family in the fifteenth and early-sixteenth and the Bozouns in the mid/ late-sixteenth century. Sir Nicholas Bacon, a notable statesman at the court of Elizabeth I, acquired Hunworth and Stody in 1572 and the two settlements remained in Bacon ownership until the arrival of the Britiffe family in 1700.06". There are some errors in this paragraph. Sir Nicholas Bacon bought the manor of Stody in 1571 and that of Hunworth in 1592. The land in Hunworth, I'm repeating a point made earlier, was owned by several different manors:

- there is a clear distinction to be made between that of land holding and the physical settlement.
- 3.2. Like the church at Stody, the church was reconstructed during the fifteenth century
- 3.3 SEVENTEENTH AND EIGHTEENTH CENTURY- Obviously there were many other sixteenth and seventeenth century houses in Hunworth as a study of the probate records reveals. It might be helpful to introduce the term 'extant'. Also one should not assume that because a building has a date on its wall that is contemporary to its building.
- "It is thought that the present Hunworth Hall was built by Edmund Britiffe, paymaster to the king, in c.1700". This is not correct. Edmund Britiffe who was 'Paymaster to the King' died in 1770 and was the son of Edmund Britiffe who built Hunworth Hall.
- "Robert Britiffe, a Norwich barrister and MP and Recorder for Norwich, acquired the estate in the early-eighteenth century, from his brother Edmund who had fallen upon financial difficulties. Upon receiving the estate, Britiffe employed the well-known cartographer, James Corbridge, to draw up an estate plan in 1726". Robert Britiffe's main claim to fame was his relationship with Sir Robert Walpole of Houghton Hall, for whom he acted as land agent. The two brothers worked closely together on developing the Hunworth Estate as is shown by their correspondence in the Norfolk Record Office.
- Having studied this estate map in some detail for my dissertation, I would like to point out that it is not a complete survey of the village. Thus rather like the Domesday Survey one has to take account of the purposes of the survey. This is why James Corbridge only included those properties in which the Britiffe's had a direct interest.

Anonymous (ref: A012)

- It would have been helpful if your feedback form had been set up as an interactive form which could simply be completed online and emailed rather than having to be downloaded (which it only appears to do as a PDF) and then emailed.
- I am a resident of Cley. I believe that the village should remain within the rural conservation area, as should the salt marshes. I believe these are integral to the landscape.
- Noted. Agreed, this is helpful feedback and will be explored for future consultations.
- Noted. The villages and the saltmarshes have now been retained in the GVCA boundary.

 I wonder how effective any of these regulations are when buildings such as Arcady in Cley appear to be able to be built notwithstanding its considerable impact on the village green. Noted. As built, Arcady was an unauthorized form of development. The enforcement notice seeking its demolition has since been upheld by the Planning Inspectorate. Its impact within the conservation area was one of the main reasons for this. The Cley Conservation Area Appraisal was one of the key documents in the appeal hearing.

Anonymous (ref: A013)

- I am writing to support Brinton Parish Council's request to extend the boundary of the GVCA to include the village of Sharrington together with 2 historic properties and surrounding fields which are not currently in the Village Conservation Area but which form a fundamental part of the setting and character of the village and its built heritage. The 2 historic properties are Valley Farm, Grade 11 listed, and the old Swan Pub situated on the edge of what would have been Sheepwalk, Common.
- Milling, a key industry in the Glaven Valley, also took place in Sharrington and a mill was recorded in Sharrington on the Glaven tributary in 1584. The presence of a water mill demonstrates the importance of the agricultural use of the land and Sharrington's connection with the Glaven and its water mills.
- Sharrington's rich agricultural history owes much to the availability of water from the tributaries which run through Sharrington and feed into the Glaven.
- The medieval period, the heyday of the Glaven ports, has left the village with its earliest surviving monuments and buildings. The ancient stone cross dating from between the tenth and sixteenth centuries is listed in the schedule of monuments as Listed Grade 2 and is believed to stand in its original position. The cross is on the highly important pilgrimage route to Walsingham which was the main centre of pilgrimage in England between the C12 and C14 centuries. Pilgrims included Henry 11, Edward 1,Henry V11 and Edward 111. It is believed the cross was erected as a preaching station/waymarker on the very important pilgrimage route through Sharrington to Walsingham. In medieval times visits to Walsingham were second only to Canterbury with pilgrims likely to have journeyed to Sharrington via the Glaven Ports.

 Noted. Sharrington and a number of fields between the village and Brinton, Thornage and Letheringsett and Valley Farm have also been incorporated. See above comments for rationale behind not including the former Swan Inn.

Anonymous (ref: A014)

- It was an interesting presentation given on the 9th March. The Glaven Valley Appraisal and Management plan is one of the better management documents I have read in my capacity as a Landscape Architect.
- To be brief, I thought that the council's view of a conservation area being primarily concerned with the built environment and, in particular, period buildings and structures, and with regard to changing boundaries to remove some buildings built in the 1990's is somewhat short sighted.
- Generally, the only opportunity for villages and small towns to expand is on land around its periphery. It is not possible to build 'period properties' by definition, and new properties will always need to meet a more stringent design requirement than the last. The council has an opportunity and authority to limit and control this expansion, as expansion is almost unavoidable. But within this expansion keeping control of the building and their curtilage will go some way to protect the whole built environment, not just the buildings, which listing is very good at.
- In summary, removing the 1990's Pereers Close, Holt peripheral development from the conservation area will permit uncontrolled changes in buildings and gardens, which generally have the worst outcomes for the sense of arrival when entering a village or small town. And the sense of arrival is hugely important of the Genius Loci of a place. Keeping the conservation boundary as it is will help provide some control of this sense of arrival.
- Noted/Clarification. An area has to be identified by the local authority as having a definite architectural quality or historic interest to merit designation (NPPF paragraph 191). From the NPPF: 'When considering the designation of conservation areas, local planning authorities should ensure that an area justifies such status because of its special architectural or historic interest, and that the concept of conservation is not devalued through the designation of areas that lack special interest.'
- Noted. With regard to the above, the area of Pereers Close is not considered to meet the criteria of having special architectural or historic interest to justify retention in the conservation area. Nor does it make a positive contribution to the overall significance of the Glaven Valley. As such, it cannot be used solely as a tool to prevent uncontrolled changes. No additional action recommended.

Anonymous (ref: A015)

- As things stand, there are arguably strong grounds this Review would not be certain of withstanding Appeal. Would the style, manner and content of the Review inspire confidence in the mind of an Inspector?
- Apart from Breck Farm and Selbrigg Pond, the exclusionists seem to have the upper hand. There is an arbitrariness about the exclusions. Whereas other settlements in the GVCA have their own designated Conservation Areas and remain included, as soon as Stody is granted its own designated Conservation Area, it is excluded. Where is the logic?
- O Because the Salt Marshes are not made for human habitation ought not to condemn them to exclusion. Their importance to the GVCA (extolled by the Review's authors for wildlife habitats) is quite the reverse. The absence of human dwellings is why it is bird sanctuary. A superb Visitors' Centre is there for the right reasons and why the Salt Marshes are one of the jewels in the GVCA crown. One can be forgiven for perceiving a certain à la carte,
- Clarification. The review has followed the guidance in Historic England's Conservation Area Advice Note 1. It has also involved additional public meetings and a longer than usual consultation period. Therefore, whilst significant changes to the text are now proposed from the original document, these are a reflection of the valuable feedback received. Should members agree to a further round of consultation, there is no reason to believe that the final appraisal will not be a robust and valuable document.
- Noted/Clarification. The proposal when the draft conservation area appraisal was released for public consultation, saw all the village conservation areas removed from the GVCA to avoid duplication. Following the consultation this has now been amended, all the villages, including Stody, have now been retained. The Saltmarshes have also now been retained.

- even random, approach to criteria. The reader should feel there is consistency in the use of a criterion.
- The arguments put forward about the undesirability of duplicating or overlapping designations do not add up in an area possessed of so much value that it has some 80 settlement Conservation Areas, a Rural Conservation Area (GVCA) an AONB and SSIs.
- At the PP & BH WP meetings, officers kept stressing that averting the threat of development could not be considered as valid grounds for seeking conservation protection. However, the authors of the Appraisals, including this one, include a section called 'Pressures From Development'. So, it is not possible to be so dogmatic about the development issue. Councillors at the above committee meetings grasped and spoke eloquently on the issue of perspective, cautioning against the picture postcard superficiality of just the present, when there was a truly remarkable history through which the Glaven Valley has evolved.
- While resident in Stiles Farmhouse the former master of Ipswich School who was a historian compiled a brief history of the Church and Wayside Cross. He found the Cross once had a fourth and southerly way. This led to the water mill. Nearby the site of the water mill is the Grade 11 listed farmhouse which is in Sharrington but not included in any Conservation Area. It is named VALLEY Farmhouse which calls into question why it has been excluded from the GVCA. It is also the spring of a chalk stream.
- The GVCA boundaries were drawn too tightly. Sharrington, its heritage assets, its wild life habitats and its hinterland belong geographically, historically and environmentally inside the GVCA. Put it in and then issue it for public consultation. Unless there is some unlikely groundswell of opinion that it should be excluded, it should remain where it rightfully belongs, along with Stody and the Salt Marshes, within the GVCA.
- At last Thursday's meeting of our Parish Council, the question arose of the land north of Brinton village being proposed for exclusion from the GVCA and rightly so.
- Nobody could deny the range of work in the recent Appraisal published by the Council's experts of choice, Purcell. However, the sheer scope of the Review means inevitably that some dimensions could have been overlooked and important avenues not researched.
- One Historic dimension overlooked in the Appraisal is that of religion. On the interiors of churches in the Glaven ports are graffiti by the hundreds of sailing ships because their crews believed in heavenly protection.

- Noted/Clarification. The conservation area designation in and of itself does not prevent development taking place, it is instead a tool for positively managing change. As discussed above, reasons for designation must demonstrate 'special architectural or historic interest', a desire to prevent development is not sufficient justification to designate an area, nor would it succeed in its goal either as the conservation area does not stop development. The appraisal sets out guidance for ways to achieve new development successfully and sustainably, without resulting in harm to the conservation area.
- Noted. The GVCA has now been amended to include Sharrington and some of its hinterland, which includes Valley Farm. This applies also the Saltmarshes, Stody and the land north of Brinton.

 Noted/Clarification. Whilst the religious history is an important aspect of the Glaven Valley, the appraisal is not intended to be an in depth study of the historical development of the area. The text has been amended to shed more light on the areas role as

- "Walsingham was one of the four great shrines in medieval Christendom, ranking alongside Jerusalem, Rome and Santiago da Compostella." It was created before the Norman Conquest by Richeldis de Faverches in 1061, after experiencing an Apparition. Pilgrimage was a holy duty and undertaken with great care. To reach Walsingham, the Glaven ports were the perfect gateway.
- From the Glaven ports to Walsingham countless thousands of pilgrims made their way on foot heading for the first route marker, namely the 14th century Wayside Cross at Sharrington, which in all probability had a reputation not just in the Glaven ports but internationally.
- Commentators have pointed to the anomaly of Stody, granted its village
 Conservation designation only to be deprived of its GVCA status. All the
 other villages have overlapping, duplicate designations. So, why not Stody?
- Geographically, Sharrington lies within the Glaven Valley. The historic links with the most famous of Glaven landowning families is strong. Its wetlands together with the soil peculiar to this area make for high quality farming. The powerful connection with pilgrimage clinches its possession of unique and special credentials for Inclusion in the GVCA.
- That the railways left the Glaven Valley alone meant they left the Valley unspoilt and tranquil. It was a close run thing, as the Station Master's House in Holt Road Cley demonstrates. It was built in expectation of a railway connection which did not materialise. Graham Allen grasped the tremendous opportunity which this heritage oasis created for NNDC and, when it was threatened with a thoughtless Letheringsett Bypass scheme, the GVCA was born.
- Norfolk County Council's Chief Surveyor produced a Letheringsett Bypass which would marked the end of the Glaven Valley because all routes would require an elevated, fast road through the Valley's heart, disfiguring the skyline with HGVs, destroying habitats and delivering, at high speed, voluminous traffic at the inadequate Holt roundabout next to the Primary School. Graham Allen and NNDC moved to create protection in the form of a Rural Conservation Area in 1984. Had that horrendous scheme not been successfully overturned, there would not have been an unspoiled Glaven Valley today.

part of the pilgrimage routes, however, for detailed studies of this other historical texts should be referred to.