

Greater Norwich Local Plan
Statement of Common Ground with
Historic England

Representations on Part 1 (The
Strategy)

Date: 03/11/2021

Purpose of Statement

1. This document has been prepared to inform the Inspector of the agreed position between GNLP and Historic England in respect of Historic England's representations on the GNLP Part 1 (The Strategy).

Background

2. Historic England are a consultee on the Plan and the GNLP authorities have discussed with Historic England issues raised by them, including objections relating to the soundness of the Plan made at the Regulation 19 stage. The GNLP authorities have considered these representations and produced a response to them. For a number of the representations the GNLP authorities consider that a "minor" additional modification could usefully be made to the Plan and that this does not relate to its "soundness"; for example, a change for clarification purposes, and that this could overcome Historic England's concerns. For other representations the GNLP authorities consider that the Plan is appropriately worded at present and is "sound", and that no modification is necessary; though in some instances the authorities would not object to a wording change being made as a "main" modification if the Inspector deemed it necessary to make the Plan sound.

3. A summary of each representation, together with the GNLP authorities' response including any potential change to the Plan, and the Historic England response to this, is set out in the appended table. The areas of agreement or remaining disagreement are also highlighted.

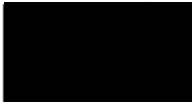
Conclusion

4. The position of the GNLP authorities and Historic England on representations made by Historic England to the GNLP Part 1 Reg 19 Proposed Submission document is set out in the appended table. The Inspector is asked to consider these in assessing the soundness of the Plan, and in determining whether any modifications might be necessary to make the Plan sound.

On behalf of GNLP authorities:
Mike Burrell
GNLP Team Manager



On behalf of Historic England:
Debbie Mack
Historic Environment Planning Adviser



8th November 2021

Appendix 1 - Table of summary of Historic England representations and responses
Part 1 – The Strategy

Appendix 2 – Letter from Historic England re historic assessment work dated
18/10/2021 (emailed).

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APPENDIX 1 Table of summary of Historic England representations and responses

Part 1 – The Strategy

POLICY/ MAP/ PARA NO. etc	REP ID/s	SUPPORT / OBJECT	MAIN ISSUES RAISED	COUNCIL RESPONSE	POTENTIAL CHANGE TO PLAN	HISTORIC ENGLAND RESPONSE
Section 1 – Introducti on						
The GNLP and other local plan documents, 24	23955	Object	You will be aware that we have raised some concerns regarding the fact that you are not proposing to update the Development Management policies. Nevertheless, the new text in paragraph 24 makes it clear that the GNLP will be used in conjunction with the existing adopted Development Management Policies. Whilst we accept that this is a perfectly acceptable approach to Plan review, and indeed many of the policies set out in the existing adopted Development	The GNLP is a strategic plan and is written accordingly. Also, in accordance with the NPPF Plans should be concise and not go into an excessive level of detail. As such the GNLP does not go into a high level of detail that might be appropriate for other local plans such as Development Management Policies Local Plans. Such other plans will also apply and	No change to the Introduction	DISAGREE We continue to have some concerns that the matter of tall buildings and the skyline is not sufficiently addressed in either this Plan or existing Plans. However, if the potential proposed modification to policy 3 and para

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			Management Plans and the City Centre Conservation Area Appraisal are good and valuable, Historic England continues to have concerns that this still leaves some policy areas lacking. In particular we are concerned that there is a lack of strategic policy framework for taller buildings and the skyline, the detailed approach to designated and non-designated heritage assets and heritage at risk.	the GNLP does not need to replicate these, though a possible proposed modification that may help to address the concern relating to heritage assets is suggested in the response to Policy 3 below. The issue of taller buildings is addressed in the response under Policy 7.1 below.		<p>204 were included (Rep 24533) this would go some way to addressing our concerns in relation to tall buildings. The potential proposed modification to policy 7.1 (Rep 23974) would also help address our concerns.</p> <p>The potential proposed modification to policy 3 (Rep 23070) would help to address our concerns in relation to the detailed approach to heritage assets.</p>

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POLICY/ MAP/ PARA NO. etc	REP ID/s	SUPPOR T/ OBJECT	MAIN ISSUES RAISED	COUNCIL RESPONSE	POTENTIAL CHANGE TO PLAN	HISTORIC ENGLAND RESPONSE
Section 2 – Greater Norwich Profile						
The Built and Historic Environment, Table 3 - Numbers of Conservation Areas, Listed Buildings, Scheduled Monuments and Registered Parks and Gardens	23956	Object	Alongside paras 104-107 and Table 3, please add a sentence in relation to heritage at risk and also historic landscape characterisation.	Although not considered necessary for the soundness of the plan, a minor modification could be made for clarity to refer to heritage at risk and historic landscape characterisation in the profile.	Make a minor modification to amend para. 107 so that it reads: In total, there are around 5,800 listed buildings and 90 conservation areas. Scheduled Monuments, significant archaeological potential and historic landscape character, as defined in assessments, add further	AGREE

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					layers to this historic character. It is important that the plan has policies to protect and enhance heritage, including heritage at risk.	
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Section 3 – The vision and objectives for Greater Norwich						
The Vision for Greater Norwich in 2038, 125	23957	Object	Changes in vision text required to replace historic assets with environment .	No changes are required for soundness, however the GNLP authorities accept that minor	Make a minor modification to change the final sentence of para. 125 to	AGREE

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				modifications should be made for clarity.	~Growth will make the best of Greater Norwich's distinct built, natural and historic environment, whilst protecting and enhancing them.	
Environment, 147	23958	Object	We welcome the reference to the protection and enhancement of distinctive local characteristics of our city, towns and villages and their separate identities. We also welcome the reference to high quality, well designed and beautiful new development picking up on the Building Better Building Beautiful report. However, this paragraph should also refer to landscape.	No changes are required for soundness, however the GNLP authorities accept that some minor modifications could be made for clarity to para.147 to include references to landscape characteristics and a further reference to green infrastructure.	Minor modification proposed so that the sentence reads: This GNLP will protect and enhance the distinctive local characteristics of our city, towns and villages and	AGREE

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					<p>their separate identities. <i>The distinctive characteristics of our landscapes will be protected and enhanced.</i></p> <p>This will be achieved by shaping high quality, well designed and beautiful new development <i>with green infrastructure in appropriate locations</i>, with homes large enough to provide for a good quality of life.</p>	
Addressing Climate	23959	Object	There is currently no reference to the question of	Such detail is regarded as being better suited to	No changes to the Climate	AGREE

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Change, Climate Change Statement			<p>climate change and the historic environment.</p> <p>Listed buildings, buildings in conservation areas and scheduled monuments are exempted from the need to comply with energy efficiency requirements of the Building Regulations where compliance would unacceptably alter their character and appearance. Special considerations are also given to locally listed buildings, buildings of architectural and historic interest within registered parks and gardens and the curtilages of scheduled monuments, and buildings of traditional construction.</p>	detailed development management policies rather than a strategy.	Change Statement.	
Section 5 – The Strategy						

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Policy 2 Sustainable Communities	23960	Object	<p>Not sound</p> <p>Policy 2 would be further improved with specific reference to conservation area appraisals in criterion 5 to read</p> <p>...taking account of landscape or historic character assessments including conservation area appraisals, design guides and codes.</p>	<p>The GNLP is a strategic plan and is written accordingly. Also, in accordance with the NPPF Plans should be concise and not go into an excessive level of detail. As such the GNLP does not go into a high level of detail that might be appropriate for other local plans such as Development Management Policies Local Plans. Such other plans will also apply and the GNLP does not need to replicate these. Currently the policy states: “ ... taking account of landscape or historic character assessments, design guides and codes”. It is not necessary to include a complete list of all the variety of documents that</p>	<p>Insert: “including conservation area appraisals” after “historic character assessments” as a minor modification to the plan for factual clarification.</p>	AGREE

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				might be relevant; however, conservation area appraisals are particularly relevant and so it is accepted that inclusion of “including conservation area appraisals” after “historic character assessments” might be beneficial as a minor modification to the plan for factual clarification.		
Policy 3 – Environmental Protection and Enhancement Para 202	23961	Object	Not sound The NPPF requires Plans to include a positive strategy for the historic environment (para 185). Include more here about the distinctive, unique heritage of the area – what makes this special and different from elsewhere?	In addition to general references in the supporting text to Policy 3, Section 2 the Greater Norwich Profile highlights key information about the area, including about heritage assets. This is adequate for the purposes of the Local Plan and accords with NPPF para 15 that requires plans to be succinct. More detailed	No change	AGREE. Whilst more could always be said in relation to the historic environment, the Plan does include a variety of references to heritage throughout. Our concern remains that development in and around Norwich should protect, enhance and even celebrate the

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				information on the area is available in a range of documents, such as conservation area appraisals, landscape character assessments etc. The “strategy” for the historic environment is achieved through Section 3 the Vision and Objectives e.g. para 147, the Plan’s Objectives under “environment”, Policy 2 Sustainable Communities, Policy 3 Environmental Protection and Enhancement, policies in separate Development Management Local Plans, and supporting documents such as Conservation Area appraisals. Hence, there is a positive strategy for the historic environment.		wonderful irreplaceable resource of the historic environment.

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Para 203	23962	Object	<p>Not sound</p> <p>The NPPF requires Plans to include a positive strategy for the historic environment (para 185). Include more here about the distinctive, unique heritage of the area – what makes this special and different from elsewhere?</p>	See response to rep 23961	No change	<p>AGREE</p> <p>Whilst more could always be said in relation to the historic environment, the Plan does include a variety of references to heritage throughout.</p> <p>Our concern remains that development in and around Norwich should protect, enhance and even celebrate the wonderful irreplaceable resource of the historic environment.</p>
Para 203	23963	Object	<p>Not sound</p> <p>Replace historic assets with heritage assets in line with the terminology used in the NPPF.</p>	It is appropriate to reflect the NPPF terminology as requested	Change text to state “heritage assets” instead of “historic assets” in para 203 as a minor modification	AGREE

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Para 204	23966	Object	<p>Not sound</p> <p>Welcome reference to guidance.</p> <p>Note reference to heritage impact assessments. HIA at planning application stage does not negate the need for HIA to inform site allocations.</p> <p>Amend scheduled ancient monuments to scheduled monuments, the preferred NPPF term.</p>	<p>Assessment of heritage issues has been incorporated within the assessment of sites. For some allocation sites that are of particular concern, as highlighted by Historic England, further explanation on the Heritage Assessment has been produced. This is adequate and proportionate as required by NPPF para 31. Also see responses in SoCG on Site Allocations.</p> <p>No objections to revising the term to “scheduled monuments</p>	<p>Change text to state “scheduled monuments” in para 204 as a minor modification</p>	<p>AGREE to the change in text for scheduled monuments.</p> <p>DISAGREE – We welcome the completion of the heritage statements for a number of sites as requested by Historic England. These statements should help inform policies in the Plan. Most of these statements will be considered in more detail in SOCG2 which relates to sites.</p> <p>However, we continue to raise concerns that in our view the GNLP heritage statements for Anglia Square and East Norwich do not really constitute sufficient heritage assessment or HIA. For East Norwich</p>

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						<p>the GNLP heritage statement advises that the masterplanning exercise will consider heritage. Furthermore, the more recent Cotswold Archaeology Built Heritage Appraisal for East Norwich, part of the masterplanning exercise, does not really include a sufficient degree of assessment for an HIA.</p> <p>For Anglia Square the GNLP heritage statement is largely a list of heritage assets, rather than an actual assessment and set of recommendations.</p> <p>Such HIA evidence is important to inform the Plan allocations – both in terms of site capacity</p>

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						<p>(including matters of density and height) and also policy requirements in the Plan (eg potential mitigation/enhancement). Without such information the allocations are not sufficiently justified as they are not based on sufficient evidence.</p> <p>The fact remains that we recommended that HIAs be prepared as part of the evidence base for the Plan in line with guidance on site allocation assessment set out in Historic England's advice notes on Local Plans (GPA1) and Site Allocations (HEAN3) in both our Regulation 18 and Regulation 19 responses, as well as at</p>

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						<p>a number of meetings/in correspondence.</p> <p>It is our view that a heritage impact assessment should be an important part of a proportionate evidence base, especially for large strategic sites and/or where there are particular heritage issues.</p> <p>Heritage Impact Assessments should be prepared prior to allocating sites which are likely to affect heritage assets to test the suitability of these sites in terms of the potential impact on the historic environment.</p> <p>It is important to establish the suitability</p>

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						<p>of the site per se prior to allocation because once a site has been allocated in an adopted Local Plan the principle of development has been established. If the sites are suitable, the measures to avoid harm, or mitigate where harm cannot be avoided, should be incorporated into the site application and its policy. These could include the extent of the allocation, capacity and/or varying densities across the site, location of buffers etc. As such we recommend inclusion of a concept diagram.</p> <p>This is consistent with other similar strategic site allocations across the East of England.</p>

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						We have written to the Council in October 2021 advising on a constructive and pragmatic way forward and suggesting how such heritage assessment could be achieved in the time frame – see Appendix 2 of this SoCG.
Para 205	23964		Not sound Replace historic assets with heritage assets in line with the terminology used in the NPPF	It is appropriate to reflect the NPPF terminology as requested	Change text to state “heritage assets” instead of “historic assets” in para 205 as a minor modification	AGREE
Para 207	23967	Object	Not sound At the start of the paragraph, make the point that harm should be avoided in the first instance	It would be useful for the supporting text to be clarified in this respect, reflecting national policy.	Change text to insert “The aim should be to avoid harm to the historic environment.” at the beginning of	AGREE

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					para 207 as a minor modification	
Para 208	23965	Object	Not sound Replace historic assets with heritage assets in line with the terminology used in the NPPF.	It is appropriate to reflect the NPPF terminology as requested	Change text to state “heritage assets” instead of “historic assets” in para 208 as a minor modification	AGREE
Para 208	23968	Object	Not sound Welcome reference to Heritage at Risk but it should be specifically mentioned in policy 3.	Para 208 is explanation for part of Policy 3 and states: “The policy also includes a flexible approach to the use of historic assets to achieve their retention whilst retaining their historic significance, and in this respect particular encouragement will be given to proposals for restoring those assets that are at risk of being lost.” Policy 3 itself requires “avoiding harm to	No change	AGREE

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				<p>designated and non-designated heritage assets”, and “providing a continued or new use for heritage assets whilst retaining their historic significance”. The policy applies to all heritage assets, which would include those at risk. It is not necessary to separately refer to heritage assets at risk, nor appropriate as it would imply that those assets at risk were of a different status in terms of applying the policy. The avoidance of harm, retention of historic significance and seeking the continuation of an appropriate use should apply irrespective of whether the heritage asset is currently deemed to be at risk or not.</p>		

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				Hence, there should be no change to the Policy in this respect.		
Para 222	23969	Object	<p>Not sound</p> <p>Replace “Historic Environment assets” with “heritage assets”, the preferred term and in line with the NPPF.</p> <p>Add: “Green Infrastructure can have a role to play in enhancing and conserving the historic environment. It can be used to improve the setting of heritage assets and to improve access to it, likewise heritage assets can help contribute to the quality of green spaces by helping to create a sense of place and a tangible link with local history”.</p>	<p>It is appropriate to reflect the NPPF terminology as requested.</p> <p>It would be useful for the supporting text to be clarified in respect of GI and the historic environment.</p>	<p>Change text to state “heritage assets” instead of “historic environment assets” in para 222 as a minor modification.</p> <p>Change text to add “As well as being of importance for the natural environment, Green Infrastructure can have a role to play in enhancing and conserving the historic environment. It can be used to</p>	AGREE

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					improve the setting of heritage assets and to improve access to it, likewise heritage assets can help contribute to the quality of green spaces by helping to create a sense of place and a tangible link with local history." at the end of para 222 as a minor modification.	
Policy 3	23970	Object	Not sound Make the policy more locally specific in order to make a positive contribution to local character and distinctiveness.	The GNLP is a strategic plan, and Policy 3 is written accordingly. The Greater Norwich area encompasses the city of Norwich, urban fringe, towns, hundreds of	No change Re BP2 - If the Inspector is minded to make a change,	DISAGREE UNLESS PROPOSED MODIFICATION IS MADE We would welcome the Proposed Modification

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			<p>BP1 - Welcome the requirement for heritage impact assessment to accompany proposals for development (but also needed for local plan sites).</p> <p>BP2 - Harm should be avoided in the first instance. And the tests are more subtle than implied. Suggest adding the phrase, 'in accordance with the requirements of the NPPF' to help clarify.</p> <p>BP 3 - reference the need to address Heritage at Risk. Include a separate paragraph in the policy after 'importance of the heritage asset.' To read, 'The Councils will maintain and update the Heritage at Risk Register and develop a strategy for addressing</p>	<p>villages and smaller settlements, and large areas of intervening countryside. As such there is great variation in local character and distinctiveness. It is not feasible for the policy to be "locally specific" for all this variety, but it does set out the strategic policy for considering the importance of local character. As stated in the policy, this starts with the Development Strategy of the Plan having regard to retaining the settlement structure and retaining the separate identities of settlements, with specific requirements in the Policy to "create a distinct sense of place and enhance local character". Hence, there should be</p>	<p>inserting "in accordance with the requirements of the NPPF " at the end of BP 2 as a Proposed Modification, then the GN authorities have no objection in principle to this.</p>	<p>set out in the previous column to reference the NPPF.</p>

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			Heritage at Risk.'	<p>no change to the Policy in this respect.</p> <p>BP1 – comments noted. See Rep 23966 re HIA for local plan sites.</p> <p>BP2 – “avoiding harm” is the starting point for this element of the Policy. As a strategic “over-arching” policy it does not go into a high level of detail. The NPPF policies will apply, and in accordance with NPPF para 16(f) it is not necessary to replicate the NPPF. The supporting text at Para 207 relates to this element of the Policy and includes a reference to being in accordance with national policy (i.e. the NPPF), therefore it is felt that the change sought to BP2 is not necessary. However, if</p>		

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				<p>the Inspector is minded to make a change, inserting “in accordance with the requirements of the NPPF” as a Proposed Modification, then the GN authorities have no objection to this.</p> <p>BP3 – the requested change, to refer to the Council maintaining a Heritage at Risk Register and developing a strategy for Heritage at Risk, would not be a planning policy but would relate to the administrative functions of the individual Councils. As such it is not appropriate for inclusion in a Local Plan.</p>		
Policy 3	24530	Object	<p>Not sound</p> <p>Add reference (policy and text) to Historic Landscape Characterisation and</p>	The GNLP is a strategic plan, and Policy 3 is written accordingly. In accordance with the NPPF Local Plans should	<p>No change</p> <p>But no objection in principle to a</p>	DISAGREED UNLESS THE PROPOSED MODIFICATION IS MADE

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			Landscape Character Assessments	<p>be concise and avoid excessive detail. It is not necessary for Policy 3 to go into the level of detail suggested.</p> <p>The policy includes: “Development proposals will be required to conserve and enhance the built and historic environment through:</p> <ul style="list-style-type: none"> - being designed to create a distinct sense of place and enhance local character taking account of local design and other guidance” Such guidance would include things like Historic Landscape Character and Landscape Character assessments. <p>It is not necessary to refer to HLC / LC in the same way as it does not list all the other types of</p> 	<p>modification being made if felt necessary by the Inspector, as set out in the Council response ie:.. to insert “such as Historic Landscape Character and Landscape Character Assessments” after “local design and other guidance“</p>	<p>We would welcome the proposed modification set out in the Councils response to refer to HLC and LCA in the Plan.</p>

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				guidance that might be applicable. However, if the Inspector is of the opinion that further clarification is necessary, then the GNLP authorities have no objection in principle to a change e.g. to insert “such as Historic Landscape Character and Landscape Character Assessments” after “local design and other guidance” as a proposed modification.		
Policy 3	24531	Object	<p>Not sound</p> <p>There would appear to be a lack of heritage evidence to date. In particular we would highlight the need for a historic environment topic paper, Heritage Impact Assessments of certain sites and also taller buildings evidence base.</p>	As set out in the NPPF the evidence base for Local Plans should be proportionate. It is not necessary to undertake excessive evidence gathering. The GNLP evidence base includes a number of specific pieces of work that have been undertaken, but behind	No change	<p>DISAGREE</p> <p>We are pleased to hear that a topic paper is being produced and look forward to seeing that.</p> <p>We appreciate there has been a degree of assessment for all sites. And we are pleased that</p>

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			Any evidence base should be proportionate.	<p>this there is a wealth of general information that is available and also utilised e.g. listed building information, Conservation Area Appraisals etc.</p> <p>A Topic Paper is being produced relating to Policy 3 which includes heritage issues.</p> <p>Assessment of heritage issues has been incorporated within the assessment of sites. For some allocation sites that are of particular concern, as highlighted by Historic England, further explanation on the Heritage Assessment has been produced. This is adequate and proportionate as required by NPPF para 31.</p>		<p>the Council has now undertaken some heritage assessments for sites of particular concern.</p> <p>The majority of assessments have been helpful in demonstrating that consideration has been given to the impact on the historic environment and highlighted the links to the policy wording (albeit in a retrospective way having been completed after the policies were formulated). In essence, these assessments evidence and catalogue the process that has been undertaken in assessing sites and formulating policy.</p>

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				Specific evidence on tall buildings is not necessary for the Plan. Adequate evidence is available through existing documents. Also see responses in SoCG on Site Allocations.		<p>However, as outlined above, in our view the heritage statements for East Norwich and Anglia Square do not constitute assessments as requested by Historic England.</p> <p>Therefore, these two site allocations and associated policies are not justified as they are not based on a proportionate heritage evidence base and are potentially not consistent with national policy (NPPF para 35).</p>
Policy 7 – Strategy for the areas of growth						
Policy 7.1 – The Norwich	24533	Object	The GNLP should include a policy for taller buildings	The existing development management policies and	Add to the end of para 204:	DISAGREED UNLESS THE PROPOSED

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urban area including the fringe parishes Paragraph 304			<p>and the skyline. Current approach (some mentions within policies and intention to produce 3D model of City to inform subsequent DM policy review) is considered insufficient.</p> <p>Recommended scope of study provided in rep.</p>	<p>conservation area appraisals (and any subsequent revisions) including the city centre conservation area appraisal sufficiently cover the considerations required for applications for tall buildings. Norwich City Council is considering creating a 3D model of the city for use in assessment. It is important to note that height is not an isolated issue and that proposals need to be looked at holistically.</p> <p>Policy 3 refers to “avoiding harm to designated and non-designated heritage assets and historic character” and so addresses the issue in general terms. The</p>	<p><i>“Therefore, for proposed buildings that are substantially taller or bulkier than surrounding buildings, or might affect views of or from heritage assets, particular care will need to be taken and for it to be demonstrated that harm is avoided, or minimised where development is justified by overriding benefits that would not otherwise be</i></p>	<p>MODIFICATION IS MADE TO THE POLICY ITSELF</p> <p>Whilst we agree that development needs to be looked at holistically and that the development management policies and City Centre Conservation Area Appraisal go some way to addressing this policy area, with the growth pressures on Norwich, combined with the fact that this is not just an issue related to the City Centre Conservation Area, it remains our view that there is a potential policy vacuum in relation to taller buildings and the skyline.</p>

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				supporting text at para 204 refers to assessing the impacts on heritage assets and states that <i>“This would include the impact of development on the setting of a heritage asset, which can contribute to its significance, and can be undermined by proposals that have substantial mass or height that contrasts with neighbouring historic buildings and the wider area”</i> . Hence, the potential impact of tall buildings is recognised in the Plan. However, this could be made clearer and so it is proposed that at the end of para 204 the following is added as a minor additional modification for clarification: <i>“Therefore,</i>	<i>achieved.”</i> as a minor additional modification for clarification. Also, a possible Proposed Modification to Policy 3 as referred to in the Council’s response, if recommended by the Inspector, would not be objected to: (eg a fourth bullet-point stating: <i>“For proposed buildings that are substantially taller or bulkier than</i>	Although there is reference to height in 7.1 5, this only applies to the City Centre. No reference is made to the issue of height in relation to East Norwich or elsewhere in the urban area. Whilst the proposed change to supporting text is a helpful addition, we suggest that similar wording is included as an additional bullet point within the policy 3 after the existing bullet point on harm to read: <ul style="list-style-type: none"> <i>For proposed buildings that are substantially taller or bulkier than surrounding buildings, or might affect views of or</i>

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				<p><i>for proposed buildings that are substantially taller or bulkier than surrounding buildings, or might affect views of or from heritage assets, particular care will need to be taken and for it to be demonstrated that harm is avoided, or minimised where development is justified by overriding benefits that would not otherwise be achieved.”</i></p> <p>It is felt that such a reference would be adequate and that no corresponding change to Policy 3 would be necessary. However, if the Inspector was minded to recommend a Proposed Modification that inserted similar wording into the Policy (eg a fourth bullet-point</p>	<p><i>surrounding buildings, or might affect views of or from heritage assets, particular care will need to be taken”.</i></p>	<p><i>from heritage assets, particular care will need to be taken’</i></p>

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				stating: “For proposed buildings that are substantially taller or bulkier than surrounding buildings, or might affect views of or from heritage assets, particular care will need to be taken”, then the GN authorities would have no objection to this.		
Paragraph 312	23971	Support	We welcome the reference at bullet point two to conserving and enhancing the historic and natural environment.	Support noted.	No change	AGREE
Paragraph 316	23972	Object	<p>Historic England recognise that this area contains a number of key brownfield sites and understand the importance of regeneration in the area for the city as a whole.</p> <p>We note the amendments made to the Anglia Square site allocation policy and also to policy 7.1 to</p>	Regard has been had to heritage issues as part of the strategic policy writing process. Further heritage assessment has been undertaken for the site at Anglia Square GNLP0506 which does not raise any insurmountable difficulties for the development. However,	No change.	DISAGREE The GNLP heritage statement for Anglia Square published in June 2021 as part of the evidence base is really just a list of heritage assets rather than a heritage impact assessment.

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			reference some of the key principles for development in this area. However, we continue to have some significant concerns regarding the approach to development at Anglia Square and the lack of HIA evidence to inform the allocation. Further more detailed comments are provided in relation to policy 7.1 and site allocation policy GNLP0506	any development will need to be undertaken sensitively with regard to the heritage assets. Also see SoCG on Part 2 of the GNLP - Site Allocations.		An assessment should consider impact on significance of assets, and make recommendations for the site including issues such as capacity, density, height etc Until we see such evidence we cannot conclude that the policy is justified and based on proportionate evidence.
Paragraph 333	24532	Object	We recognise the opportunities provided in East Norwich for brownfield regeneration.	The East Norwich Strategic Regeneration Area is subject to a comprehensive master planning process which	No change	DISAGREE The heritage statement prepared by GNLP in 2021 is not in our view an assessment but

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			<p>Concerns regarding Carrow Works (Abbey/Priory) set out in response to site allocation policy.</p> <p>Question capacity of the East Norwich sites.</p> <p>Suggest detailed HIA is required to appropriately inform development / allocation potential including any necessary mitigation or enhancements that could be made.</p>	<p>has commenced and is ongoing. This work will cover heritage impacts and capacity of the site in more detail.</p> <p>Regard has been had to heritage issues as part of the strategic policy writing process. However, any development will need to be undertaken sensitively with regard to the heritage assets.</p> <p>Also see SoCG on Part 2 of the GNLP - Site Allocations.</p>		<p>instead outlines what work is intended in relation to heritage and the masterplan.</p> <p>Of all the sites in the Local Plan, this site is probably the most important site needing a heritage impact assessment to inform the Local Plan, site capacity and policy wording.</p> <p>Without a heritage impact assessment in place, the Plan is not justified.</p> <p>We appreciate that some heritage work has been undertaken as part of the masterplanning process. However, more fundamentally heritage assessment needs to</p>

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						<p>inform the Plan, not just flow from the Plan.</p> <p>The assessment needs to look at the heritage baseline, assess potential impact of heritage including level of harm and suggest mitigation/enhancement opportunities, advise on capacity etc.</p> <p>Until we see such evidence we cannot conclude that the policy is justified and based on proportionate evidence.</p>
Policy 7.1 – The Norwich urban area including the fringe parishes	23973	Object	Concerns relating to Housing figures (continued concern since Reg 18C) HIA required to test and inform the capacity of sites; these have not been done. This calls into question the	Regard has been had to heritage issues as part of the site assessment process. However, any development will need to be undertaken sensitively with regard to the heritage assets.	No change	<p>DISAGREE</p> <p>In the absence of suitable heritage assessments for Anglia Square or East Norwich, we are unable to confirm whether the dwelling numbers for these sites</p>

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			<p>accuracy of the capacity of some of the sites.</p> <p>Clarification of numbers attributed to Northern City Centre regeneration area would be useful.</p> <p>Difficult to say whether doubling of housing figures at East Norwich from 2,000 to 4,000 is realistic without HIA evidence.</p> <p>We find the Plan unsound as it is not justified since it is not based on sufficient evidence in relation to the historic environment.</p> <p>High densities on brownfield sites may be possible to achieve but it would not be appropriate the densities associated with very tall buildings in metropolitan areas.</p>	<p>Housing figures for Northern City Centre regeneration area had regard to the report produced by the Secretary of State determining the called in application. A significant reduction in housing numbers was made in the allocation from that proposed in the application. This is believed to be a reasonable estimate based on the location, scale and nature of the development.</p> <p>ENSRA The masterplan process will examine how barriers to development can be addressed to deliver exemplar development across the East Norwich Regeneration Areas and</p>		<p>are realistic or acceptable in terms of impacts upon the historic environment.</p> <p>Northern City Centre: Having reviewed the Secretary of States report, there is no specific reference to housing numbers in the report. Evidence is needed to support the housing figures proposed for Anglia Square.</p> <p>ENSRA Therefore, until we have the evidence from the masterplan, we cannot be sure that the figures given for housing numbers in the Plan are realistic or achievable which further underscores the need for more evidence to justify the Local Plan policy</p>

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				<p>as part of this heritage and the historic environment will be considered. It should be reiterated that the masterplan is not starting from housing numbers – instead it is about understanding the site constraints and being guided by these.</p> <p>Also see SoCG on Part 2 of the GNLP - Site Allocations.</p>		including site capacity. Until such evidence is in place the East Norwich allocation is not justified or consistent with national policy (NPPF para 35).
Policy 7.1 Criterion 5 Built, Natural and Historic Environment	23974	Object	<p>The wording of the first sentence is very generic and should be more locationally specific to Norwich,</p> <p>Bullet point two should be amended and re-ordered – suggested wording provided in representation with added emphasis to <i>'Heritage Impact Assessments and</i></p>	The GN Authorities consider that the existing development management policies and conservation area appraisals (and any subsequent revisions) including the city centre conservation area appraisal sufficiently cover the considerations required for applications	<p>First sentence - No change</p> <p>Re bullet point 2 - If the Inspector is minded to make a change to this bullet point, as a Main Modification, then the GN</p>	<p>First sentence - AGREE</p> <p>DISAGREE</p> <p>Bullet point 3. We accept that you have not completed a Tall Buildings study and so it would be inappropriate to refer to this in policy.</p> <p>We also note that the policy wording is an</p>

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			<p><i>the Taller Buildings and the Skyline Study</i>’.</p> <p>(nb. There was a formatting error in the published website version of the document that converted the opening line of this section to a bullet-point and so shows bullet-point 2 as bullet-point 3; the website version is incorrect).</p> <p>Deletion of bullet point relating to landmark buildings in earlier draft welcomed.</p> <p>East Norwich: Concern regarding doubling of housing figure from 2,000 to 4,000. Question whether this is realistic, suggest HIA.</p> <p>Elsewhere in the urban Area: There is currently no reference to the need to</p>	<p>for tall buildings. Norwich City Council is considering creating a 3D model of the city for use in assessment. It is important to note that height is not an isolated issue and that proposals need to be looked at holistically. The policy as worded is considered to be sound and therefore it is not necessary to make the change suggested, however the GNLP authorities would not object to a proposed modification being put forward by the Inspector.</p>	<p>authorities have no objection to this, with a slight amendment to that proposed, changing BP 2 to:</p> <p><i>“New development proposals will respect the character of the city centre conservation area and address the principles set out in the City Centre Conservation Area Appraisal (or any successor), in particular in relation to</i></p>	<p>improvement and would be further improved by the suggested Main Modifications set out in column 5. We would welcome the inclusion of this revised wording.</p> <p>We do still have concerns regarding lack of strategic policy framework for taller buildings for the city as a whole (outside of the City Centre Conservation Area) as set out in our response to Rep 24533.</p> <p>However, if the potential proposed modification to policy 3 and para 204 were included (Rep 24533) this would go some way to addressing our concerns in relation to tall buildings.</p>

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			<p>conserve and enhance the historic environment within the list of bullet points for these areas.</p> <p>Amend the Plan to include a bullet point in relation to the historic environment.</p>		<p><i>scale, mass, height, layout and design. New development will be sustainable and, where appropriate, innovative design.</i></p> <p>Re Elsewhere in the urban area: If the Inspector is minded to make a change to this to include a bullet point referencing the need to conserve the historic environment, as a Main</p>	

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					Modification, then the GN authorities have no objection to this,	
Policy 7.6 Preparing for new settlements	23975	Object	We strongly advise that sufficient evidence in relation to the historic environment is prepared to inform the choice of new settlement.	Agreed. This will be part of the assessment and optioneering process which will support the next local plan.	No change	AGREE
Appendix 2 - Glossary	23976	Object	Soundness objection raised as the glossary does not include definitions for Listed Building and Local List and Registered Park and Garden. Also the definition for Scheduled Ancient Monument should be changed to scheduled monument.	No changes are required for soundness. However, we agree that minor modifications could be made for clarity by including/amending these entries in the glossary.	Minor additional modification to the glossary to include definitions for listed building, local listed building, registered park and garden. Also amend glossary entry from scheduled ancient monument to	AGREE

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					scheduled monument.	

Appendix 2 – Letter from Historic England re historic assessment work dated 18/10/2021 (emailed)



John Walchester

Our ref:

Telephone 01223 582775

18 October 2021

Dear John

Greater Norwich Local Plan HIAs and SOCG

Thank you for meeting with me last week to finalise the Statements of CommonGround and discuss the remaining Heritage Impact Assessments. We thought it would be useful to follow up our meeting with a letter summarising our advice in relation to those HIAs.

Whilst appreciating the time and resource constraints, we continue to recommend the completion of at least some level of HIA for both the East Norwich and Anglia Squaresites.

As you commented in our meeting, there is not really the evidence to justify those sites in terms of the impact on the historic environment; without such evidence those Local Plan allocations themselves are not fully justified. The NPPF (para 35) makes it clear that for Plans to be sound they need to be justified, based on a proportionate evidence base.

We are keen to help you ensure that the right evidence is in place to support those allocations and want to help you find a proportionate and pragmatic way of achieving this.

At our meeting we discussed a potential way forward in terms of the scope of additional work to provide at least some level of assessment; a lighter touch HIA given the circumstances for both these sites, but broadly covering the main requirements for HIA set out in our advice note HEAN 3— site allocations in local plans: <https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/> (see methodology on page 5)

In essence, it is important that you

- a) Identify any heritage assets that may be affected by the potential site allocation.





- b) Understand what contribution the site makes to the significance of the asset
- c) Identify what impact the allocation might have on that significance
- d) Consider maximising enhancements and avoiding harm (mitigation)
- e) Determine whether the proposed allocation is appropriate in light of the NPPFs tests of soundness

In assessing sites it is important to identify those sites which are inappropriate for development and also to assess the potential capacity of the site in the light of any historic environment (and other) factors.

For both sites, some helpful initial work has been undertaken in relation to identification of heritage assets (and some discussion of significance). In both instances, the assessments to date have largely focussed on step (a) of the above 5 step methodology. We would encourage you to seek to undertake some additional work to ensure this evidence is in place for the EiP. This is discussed in more detail in relation to each of the sites below.

East Norwich

We welcome the work undertaken by Cotswold Archaeology – the Heritage Statement to support the emerging masterplan. This report provides a helpful short summary of many of the on-site and nearby heritage assets, including some discussion of their significance. However, whilst a helpful starting point, as we discussed it would be good to add some more to the report to help meet the requirements for an HIA. (Alternatively, this could be a separate, standalone annex to the report).

The report should include a section to explore the potential impact of development of the site upon the heritage assets (and their settings) and investigate the contribution of the site itself to the setting of other heritage assets. Chapter 6 does begin to discuss potential impacts on setting but doesn't really fully explore matters such as impact, harm etc.

The report will also need to be clear which buildings to retain and which are of lower significance or detrimental to the site.

A section on mitigation and enhancement is also recommended. (Chapter 7 of the Cotswold report is about enhancement but it is really quite superficial). This should be summarised as very clear recommendations, ideally as bullet points that could then be used in the Local Plan policy and also to inform the masterplan.

This should consider which buildings etc should be retained, where open space is needed to protect assets/ settings, where additional planting is needed, where there are key views etc. It should also address issues such as capacity, density and height. Ideally this could be illustrated on a diagram.

We discussed that this additional work could either be undertaken in-house or perhaps as an additional piece of work by Cotswold Archaeology. But regardless, it would be helpful if this work was completed in advance of the EiP.

Historic England, Brooklands, 24 Brooklands Avenue, Cambridge CB2 8BU
Telephone 01223 58 2749 HistoricEngland.org.uk

Please note that Historic England operates an access to information policy.





Anglia Square

The heritage statement prepared by GNLP really largely lists the assets in and around the site with little actual assessment of potential impact.

Whilst recognising the time and resource constraints, it would be helpful to prepare a few additional pages to this report which essentially consider steps 2-5 of the Heritage Impact Assessment site selection methodology set out on page 5 of HEAN 3.

The report should explore what contribution the site makes to the significance of assets.

It should then consider what potential impact the development of the allocation would have of the significance of assets.

It should recommend potential mitigation and enhancement measures (ideally in bullet point form) so that these recommendations are very clear and can then be included in the Plan policy for the site. Consideration should be given to height, density, capacity, open space, landscaping, materials, key views etc.

A diagram can also be useful to illustrate these key recommendations.

Ideally this would be completed in house. It need not be long but should cover these main areas. Alternatively, although not ideal, you could explore whether the developers have undertaken some similar work already, or would be in a position to complete it. Again, it would be helpful if this work was completed in advance of the EiP.

Statements Of Common Ground

Thank you for your work on the SOCGs. As you are aware, two of the remaining key issues are the two HIAs for these sites. We very much hope that you will be able to complete these relatively small but important additional pieces of evidence prior to examination. We may then be able to revisit our SOCGs to update the position for the benefit of the Inspector.

We trust that this advice will be useful to you in setting out what we consider is needed for those two sites. Should you wish to discuss the matter in more detail or require any clarification on the above, please do not hesitate to contact us.

Yours sincerely

Debbie Mack
Historic Environment Planning Adviser
Debbie.Mack@HistoricEngland.org.uk

