

Greater Norwich Local Plan
Statement of Common Ground with
Historic England

Representations on Part 2 (Site
allocations)

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 2 (Site Allocations).

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 2 (Site Allocations) 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 2 – Site Allocations

Greater Norwich Local Plan (GNLP)

APPENDIX 1 Table of summary of Historic England representations and responses

Part 2 – Site Allocations

Policy/ Map/ Para no. etc	Rep ID/s	Support/ Object	Main Issues Raised	Council response	Potential change to plan	Historic England response
Site assessme nts booklet introductio n	23977	Object	Soundness objection raised relating to site assessment booklets and lack of Heritage Impact Assessments. Insufficient evidence in relation to the historic environment to support the site allocations. The assessments do not follow the five step methodology for site allocations set out in our Advice note 3. They do not properly consider the significance of the heritage assets, the impact of development upon the significance of those assets or mitigation and enhancement. This is particularly concerning for the sites where we suggested more detailed HIA was required and we continue to advise that	Regard has been had to heritage issues as part of the site assessment process. Further heritage assessment has been undertaken for the sites identified by Historic England which has not raised any insurmountable difficulties for their development. However, it is acknowledged that development will need to be undertaken sensitively with regard to heritage assets which is recognised in the supporting text and policy requirements for those sites.	No change	DISAGREE We are pleased to see that further heritage assessment has now been undertaken for most of the identified sites. It is important that the recommendations of these Heritage Statements are included in the Plan. Therefore HE has suggested some additional policy wording for some

Greater Norwich Local Plan (GNLP)

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			these are prepared. Some new sites will also require HIAs.			<p>specific sites where Heritage Statements were produced. This suggested wording is included in this column. The suggested wording reflects the recommendations of the assessments. GNLP have agreed this proposed wording.</p> <p>It is HE's view that a heritage impact assessment is still needed for two sites: East Norwich and Anglia Square.</p>
Existing allocations carried forward (Norwich) CC2	23994	Object	Identification of key listed buildings affected by allocation should be listed in policy. Policy wording should also make reference to the 'Area of Main Archaeological Interest'	This is an existing allocation which is being carried forward. The area of main archaeological interest is referenced in supporting text paragraph 2.104	. A factual correction is proposed as an Additional Modification to	AGREED

Greater Norwich Local Plan (GNLP)

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				<p>Archaeological importance is included under heritage assets and so addressed under Norwich City Council's existing adopted Development Management Policy 9 'Safeguarding Norwich's heritage', GNLP policy 3 Environmental Protection and Enhancement as well as within the NPPF. However, in recognition of the concentration of archaeology within Norwich an "area of main archaeological interest" has previously been identified that includes the site in question. A reference highlighting this in policy could usefully be included for those sites affected by it, and so a factual correction is</p>	<p>add to the policy: The site is located within the Norwich Area of Main Archaeological Interest. An archaeological assessment will be required as part of a planning application.</p>	

Greater Norwich Local Plan (GNLP)

Policy/ Map/ Para no. etc	Rep ID/s	Support/ Object	Main Issues Raised	Council response	Potential change to plan	Historic England response
				proposed as a minor modification to the Plan		
CC3	23995	Support	Welcome updates made to policy wording (criteria 2,3&7) since regulation 18 to reference heritage assets and archaeology	Support noted	None	AGREED
CC4a	23996	Support	Welcome changes made to allocation policy since regulation 18C consultation with reference to heritage assets	Support noted Archaeological importance is included under heritage assets and so addressed under Norwich City Council's existing adopted Development Management Policy 9 'Safeguarding Norwich's heritage', GNLP policy 3 Environmental Protection and Enhancement as well as within the NPPF.	A factual correction is proposed as an Additional Modification: Add sentence to paragraph 2.120 to state: " Development of the sites must address a number of constraints including its location within	AGREED

Greater Norwich Local Plan (GNLP)

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				However, in recognition of the concentration of archaeology within Norwich an “area of main archaeological interest” has previously been identified that includes the site in question. A reference highlighting this in policy could usefully be included for those sites affected by it, and so a factual correction is proposed as a minor modification to the Plan.	the City Centre Conservation Area and the Area of Main Archaeological Interest.” A factual correction is proposed as an Additional Modification: add additional Criterion in policy: “The site is located within The Area of Main Archaeological Interest. An archaeological assessment will be required as part of a	

Greater Norwich Local Plan (GNLP)

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					planning application”	
CC4b	23997	Support	Welcomes criteria 3, 4 and 5 which reference heritage assets. It will be important that density and scale of development on this site properly reflects the character of the Conservation Area.	Support noted Archaeological importance is included under heritage assets and so addressed under Norwich City Council’s existing adopted Development Management Policy 9 ‘Safeguarding Norwich’s heritage’, GNLP policy 3 Environmental Protection and Enhancement as well as within the NPPF. However, in recognition of the concentration of archaeology within Norwich an “area of main archaeological interest” has previously been	A factual correction is proposed as an Additional Modification: add additional Criterion in policy: “The site is located within The Area of Main Archaeological Interest. An archaeological assessment will be required as part of a	AGREED

Greater Norwich Local Plan (GNLP)

Policy/ Map/ Para no. etc	Rep ID/s	Support/ Object	Main Issues Raised	Council response	Potential change to plan	Historic England response
				identified that includes the site in question. A reference highlighting this in policy could usefully be included for those sites affected by it, and so a factual correction is proposed as a minor modification to the Plan.	planning application”	
CC7	23998	Object	Requirement for archaeological assessment is mentioned in supporting text; this should also be included in the policy.	Archaeological importance is included under heritage assets and so addressed under Norwich City Council's existing adopted Development Management Policy 9 'Safeguarding Norwich's heritage', GNLP policy 3 Environmental Protection and Enhancement as well as within the NPPF. However, in recognition of the concentration of archaeology within	A factual correction is proposed as an Additional Modification: add additional Criterion in policy: “The site is located within The Area of Main Archaeological Interest. An archaeological assessment will be	AGREED

Greater Norwich Local Plan (GNLP)

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				Norwich an “area of main archaeological interest” has previously been identified that includes the site in question. A reference highlighting this in policy could usefully be included for those sites affected by it, and so a factual correction is proposed as a minor modification to the Plan.	required as part of a planning application”	
CC8	23999	Object	<p>Update to criteria relating to historic street frontage, the Conservation Area and listed buildings, scale and form of development and locally listed structures since reg 18C welcomed</p> <p>Supporting text mentions trial trenching will be required prior to development, this should be included in policy.</p>	<p>Archaeological importance is included under heritage assets and so addressed under Norwich City Council’s existing adopted Development Management Policy 9 ‘Safeguarding Norwich’s heritage’, GNLP policy 3 Environmental Protection and Enhancement as well as within the NPPF. However, in recognition</p>	<p>A factual correction is proposed as an Additional Modification: add additional Criterion in policy: “The site is located within The Area of Main Archaeological Interest. An archaeological</p>	AGREED

Greater Norwich Local Plan (GNLP)

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				of the concentration of archaeology within Norwich an “area of main archaeological interest” has previously been identified that includes the site in question. A reference highlighting this in policy could usefully be included for those sites affected by it, and so a factual correction is proposed as a minor modification to the Plan. Although not believed to be necessary for soundness, the Councils would not object to a reference in policy to “trial trenching” in principle”	assessment will be required as part of a planning application” If the Inspector is minded to include a requirement in the policy for “trial trenching” the GNLP authorities have no objection to this in principle.	
CC10	24000	Object	Welcome the changes to the policy to include reference to the Conservation area and listed buildings at criterion 1 (criterion 2 is the same as criterion 1. Delete criterion 2).	Appreciation of amendments since regulation 18C acknowledged. Highlighting of typographical error	A typographical error has been highlighted. Deletion of the repeated point is appropriate.	AGREED

Greater Norwich Local Plan (GNLP)

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			We welcome criterion 4 in relation to archaeology.	repeating the same policy requirement twice and suggestion one is deleted acknowledged.	It is appropriate for this correction to be made as an additional / minor modification.	
CC11	24001	Object	<p>Welcomes the addition of criterion 1 that specifically mentions the conservation area and listed buildings.</p> <p>The supporting text mentions that archaeological investigation will be required. This requirement should also be included in the policy.</p>	Archaeological importance is included under heritage assets and so addressed under Norwich City Council's existing adopted Development Management Policy 9 'Safeguarding Norwich's heritage', GNLP policy 3 Environmental Protection and Enhancement as well as within the NPPF. However, in recognition of the concentration of archaeology within Norwich an "area of main archaeological interest" has previously been	<p>A factual correction is proposed as an Additional Modification: add additional Criterion in policy:</p> <p>"The site is located within The Area of Main Archaeological Interest. An archaeological assessment will be required as</p>	AGREED

Greater Norwich Local Plan (GNLP)

Policy/ Map/ Para no. etc	Rep ID/s	Support/ Object	Main Issues Raised	Council response	Potential change to plan	Historic England response
				identified that includes the site in question. A reference highlighting this in policy could usefully be included for those sites affected by it, and so a factual correction is proposed as a minor modification to the Plan.	part of a planning application"	
CC13	24002	Support	We welcome the inclusion of criteria 1 and 2 in relation to scale and massing and also impact on nearby conservation areas.	Support noted	None	AGREED
CC15	24003	Object	This site is located adjacent to the St Matthews Conservation Area. There are also two grade II listed buildings to the north of the site (The Coach and Horses public house and 60 Thorpe Road). The nearby station is also grade II listed.	No changes are required for soundness, however the GNLP authorities accept that modifications could be made for clarity by including reference to nearby grade II listed heritage assets.	No change However, there is no objection in principle to a Proposed Modification being made to: amend criterion 1 by: inserting reference to	DISAGREED UNLESS THE PROPOSED MODIFICATION IS MADE Historic England maintain that the policy should also mention the listed buildings.

Greater Norwich Local Plan (GNLP)

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			<p>We welcome mention of the conservation area in the policy at criterion 1.</p> <p>The policy should also mention the listed buildings.</p>		grade II listed buildings (The Coach and Horses public house, 60 Thorpe Road and Norwich train station) as a Proposed Modification,	
CC16	24004	Support	We welcome the changes to this policy to include criterion 2 that specifically references the Bracondale Conservation Area and nearby listed buildings including Carrow Priory and Boom Towers.	Support noted	None	AGREED
CC18 (CC19)	24005	Support	<p>Land at 140-154 Oak Street and 70-72 Sussex Street Unsound</p> <p>We welcome the changes to criterion 1 to include specific reference to the grade II listed Great Hall.</p> <p>The policy would be further improved by including reference</p>	<p>The Area of Main Archaeological Interest is listed as a constraint in the supporting text.</p> <p>Archaeological importance is included under heritage assets</p>	A factual correction is proposed as an Additional Modification: add additional Criterion in policy:	AGREED

Greater Norwich Local Plan (GNLP)

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			to the Area of Main Archaeological Interest into the policy. Include criterion in relation to archaeological assessment in policy.	and so addressed under Norwich City Council's existing adopted Development Management Policy 9 'Safeguarding Norwich's heritage', GNLP policy 3 Environmental Protection and Enhancement as well as within the NPPF. However, in recognition of the concentration of archaeology within Norwich an "area of main archaeological interest" has previously been identified that includes the site in question. A reference highlighting this in policy could usefully be included for those sites affected by it, and so a factual correction is proposed as a minor modification to the Plan.	"The site is located within The Area of Main Archaeological Interest. An archaeological assessment will be required as part of a planning application" A factual correction is proposed as an Additional Modification: add additional Criterion in policy: "The site is located within The Area of Main Archaeological Interest. An	

Greater Norwich Local Plan (GNLP)

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					archaeological assessment will be required as part of a planning application”	
CC24	24006	Object	<p>We welcome criteria 1, 2 and 4 and in particular welcome the reference to height in criterion 2.</p> <p>The policy would be further improved by including reference to the Area of Main Archaeological Interest into the policy.</p>	<p>The Area of Main Archaeological Interest is listed as a constraint in the supporting text.</p> <p>Archaeological importance is included under heritage assets and so addressed under Norwich City Council’s existing adopted Development Management Policy 9 ‘Safeguarding Norwich’s heritage’, GNLP policy 3 Environmental Protection and Enhancement as well as within the NPPF.</p>	<p>A factual correction is proposed as an Additional Modification: add additional Criterion in policy: “The site is located within The Area of Main Archaeological Interest. An archaeological assessment will be required as</p>	AGREED

Greater Norwich Local Plan (GNLP)

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				However, in recognition of the concentration of archaeology within Norwich an “area of main archaeological interest” has previously been identified that includes the site in question. A reference highlighting this in policy could usefully be included for those sites affected by it, and so a factual correction is proposed as a minor modification to the Plan.	part of a planning application”	
CC30	24007	Object	<p>We welcome the revisions to criteria 2 and 5 to specifically reference listed buildings, the City Centre Conservation Area scheduled monument and scale and massing as well as heritage interpretation.</p> <p>The supporting text mentions that archaeological investigation will be required. This requirement should also be</p>	<p>The Area of Main Archaeological Interest is listed as a constraint in the supporting text.</p> <p>Archaeological importance is included under heritage assets and so addressed under Norwich City Council’s existing adopted</p>	<p>A factual correction is proposed as an Additional Modification: add additional Criterion in policy: “The site is located within The Area of</p>	AGREED.

Greater Norwich Local Plan (GNLP)

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			included in the policy. Include criterion in relation to archaeological assessment in policy.	Development Management Policy 9 'Safeguarding Norwich's heritage', GNLP policy 3 Environmental Protection and Enhancement as well as within the NPPF. However, in recognition of the concentration of archaeology within Norwich an "area of main archaeological interest" has previously been identified that includes the site in question. A reference highlighting this in policy could usefully be included for those sites affected by it, and so a factual correction is proposed as a minor modification to the Plan.	Main Archaeological Interest. An archaeological assessment will be required as part of a planning application"	

Greater Norwich Local Plan (GNLP)

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R7	24008	Support	We welcome reference in bullet point 2 of the policy to the church and the locally listed residential terraces.	Support noted	None	AGREED
R13	24009	Object	We welcome the inclusion of bullet point 2 in the policy but continue to suggest that reference should also be made to the City Centre Conservation Area and the nearby grade II listed buildings, Bridge House PH and Chalk Hill House.	No changes are required for soundness, however the GNLP authorities accept that modifications could be made for clarity by including reference to the nearby City Centre Conservation Area and the nearby grade II listed buildings, Bridge House PH and Chalk Hill House in criterion 2	No change However, there is no objection in principle to a Proposed Modification being made to criterion 2 by: inserting reference to the City Centre Conservation Area and the nearby grade II listed buildings, Bridge House PH and Chalk Hill House	DISAGREED UNLESS THE PROPOSED MODIFICATION IS MADE Historic England maintain that reference should be made in the policy to the Conservation Area and listed buildings.

Greater Norwich Local Plan (GNLP)

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R14/15	24010	Support	We welcome the reference to the City Centre and St Mathew's conservation areas as well as the Thorpe Hamlet conservation area. We welcome criterion 3 in relation to important views.	Support noted	No change	AGREED
R17	24011	Support	We welcome the reference to the locally listed shoe factory building in the policy.	Support noted	No change	AGREED
R20	24012	Support	POLICY R20 Land east of Starling Road Sound We welcome bullet point 2 of the policy that references the Conservation Area and locally listed terraces.	Support noted	No change	AGREED
R31	24013	Support	We welcome the changes to criterion 2 to specifically reference St Bartholomew's Church and the various locally listed buildings. We welcome criterion 9 relating to archaeological assessment. (Updates since reg 18C draft)	Support noted	No change	AGREED

Greater Norwich Local Plan (GNLP)

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R33	24014	Support	We welcome reference to Earlham Cemetery in criterion 1 and to heritage interpretation at criterion 5.	Support noted	No change	AGREED
R36	24015	Support	We welcome bullet point 1 of the policy that references the Conservation Area.	Support noted	No change	AGREED
R37	24016	Support	We welcome the changes to the policy wording to make specific reference to the Earlham Cemetery Registered Park and Garden and listed Jewish Mortuary Chapel.	Support noted	No change	AGREED
R38	24017	Support	We welcome reference to the Conservation Area and Bowthorpe Hall within bullet point 4 of the policy.	Support noted	No change	AGREED

Greater Norwich Local Plan (GNLP)

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R42	24018	Support	We welcome reference to the Conservation Area and Bowthorpe Hall within bullet point 4 of the policy.	Support noted	No change	AGREED
GNLP 0068	23980	Object	We welcome the changes to policy and the addition of criterion 3 in relation to heritage assets. The policy would be further improved by including reference to the Area of Main Archaeological Interest into the policy.	<p>The Area of Main Archaeological Interest is listed as a constraint in the supporting text.</p> <p>Archaeological importance is included under heritage assets and so addressed under Norwich City Council's existing adopted Development Management Policy 9 'Safeguarding Norwich's heritage', GNLP policy 3 Environmental Protection and Enhancement as well as within the NPPF. However, in recognition of the concentration of</p>	A factual correction is proposed as an Additional Modification: add additional Criterion in policy: "The site is located within The Area of Main Archaeological Interest. An archaeological assessment will be required as part of a	AGREED

Greater Norwich Local Plan (GNLP)

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				archaeology within Norwich an “area of main archaeological interest” has previously been identified that includes the site in question. A reference highlighting this in policy could usefully be included for those sites affected by it, and so a factual correction is proposed as a minor modification to the Plan.	planning application”	
GNLP013 3BR	23981	Object	We continue to suggest that a detailed HIA is prepared for the campus as a whole to inform future development and the impact on the historic environment.	Regard has been had to heritage issues as part of the site assessment process. Further heritage assessment has been undertaken which does not raise any insurmountable difficulties for the development. However, any development will need to be undertaken sensitively with regard to the heritage assets. This	No change However, there is no objection in principle to a Proposed Modification being made to insert at the end of criteria 2: “a Heritage Impact Assessment	DISAGREED UNLESS THE PROPOSED MODIFICATION IS MADE We welcome the completion of a heritage statement for the site in Summer 2021. It provides a fair, thorough and helpful explanation of the

Greater Norwich Local Plan (GNLP)

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				<p>is recognised in paragraph 2.33 and criteria 2 which requires the protection and enhancement of the significance of the heritage assets as part of any development.</p> <p>If the Inspector thinks it is appropriate, the GN authorities have no objection in principle to a Proposed Modification being made to insert at the end of criteria 2:</p> <p>“a Heritage Impact Assessment should be undertaken, including the need for archaeological evaluation and recording, and regard should be had to the recommendations of the GNLP Heritage Statement (June 2021)”</p>	<p>should be undertaken, including the need for archaeological evaluation and recording, and regard should be had to the recommendations of the GNLP Heritage Statement (June 2021)”</p>	<p>background to the Enterprise Centre, Earlham Hall and this site in particular.</p> <p>The assessment makes a number of helpful recommendations regarding mitigation which will ensure that the policy is effective in conserving and enhancing the historic environment. These various mitigation measures should be more closely reflected in the policy.</p> <p>To that end we recommend the following change to policy:</p>

Greater Norwich Local Plan (GNLP)

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						<p>At end of criterion 2 add: ...and landscaping, a Heritage Impact Assessment should be undertaken, including the need for archaeological evaluation and recording, and regard should be had to the recommendations of the GNLP Heritage Statement (June 2021)</p> <p>Add additional bullet: <u>An archaeological assessment will be required at an early stage prior to development.</u></p>

Greater Norwich Local Plan (GNLP)

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GNLP 0133DR	23982	Object	<p>Criterion 2 has been very much improved by reference to heritage assets. We suggest replacing respect with 'conserve and enhance the heritage significance. We also suggest inserting a comma after Terraces.</p> <p>We continue to suggest that a detailed HIA is prepared for the campus as a whole to inform future development and the impact on the historic environment.</p>	<p>A typographical error has been highlighted. The GNLP authorities accept that a minor modification could be made to correct the following error:: 'addition of a comma after the word 'Terraces' and before the word 'Grade' in criterion 2 of the policy text.</p> <p>Regard has been had to heritage issues as part of the site assessment process. Further heritage assessment has been undertaken which does not raise any insurmountable difficulties for the development. However, any development will need to be undertaken sensitively with regard to the heritage assets. This is recognised in</p>	<p>A factual correction is proposed as an Additional Modification: 'addition of a comma after the word 'Terraces' and before the word 'Grade' in criterion 2 of the policy text.</p> <p>If the Inspector thinks it appropriate, the authorities have no objection in principle to a Proposed Modification to replace the word 'respect' with 'conserve</p>	<p>DISAGREED UNLESS THE PROPOSED MODIFICATION IS MADE</p> <p>Welcome the Council's proposal to insert a comma.</p> <p>HE maintain that it would be helpful to replace the word respect with conserve and enhance in line with the NPPF.</p> <p>We welcome the completion of a heritage statement for the site in Summer 2021.</p> <p>It provides a helpful summary of the background to the</p>

Greater Norwich Local Plan (GNLP)

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				<p>paragraph 2.37 and criteria 2</p> <p>If the Inspector thinks it is appropriate, the GN authorities have no objection in principle to a Proposed Modification being made to criteria 2 to replace “respect” with “conserve and enhance”; and insert at the end of criteria 2:</p> <p>“a Heritage Impact Assessment should be undertaken, including the need for archaeological evaluation and recording, and regard should be had to the recommendations of the GNLP Heritage Statement (June 2021)”.</p>	<p>and enhance’ in Criterion 2, and add to the end of criterion 2: “a Heritage Impact Assessment should be undertaken, including the need for archaeological evaluation and recording, and regard should be had to the recommendations of the GNLP Heritage Statement (June 2021)”.</p>	<p>UEA site, masterplan etc and DFS etc.</p> <p>The assessment makes a number of helpful recommendations regarding mitigation which will ensure that the policy is effective in conserving and enhancing the historic environment. These various mitigation measures should be more closely reflected in the policy.</p> <p>To that end we recommend the following change to policy:</p>

Greater Norwich Local Plan (GNLP)

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						<p>Amend criterion 2 to insert the following:</p> <p>replace the word 'respect' with 'conserve and enhance' in Criterion 2, and add to the end of criterion 2: "a Heritage Impact Assessment should be undertaken, including the need for archaeological evaluation and recording, and regard should be had to the recommendations of the GNLP Heritage Statement (June 2021)"</p>

Greater Norwich Local Plan (GNLP)

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GNLP 0282	23983	Support	Policy GNLP0282 Land at Constitution Motors Sound Welcome bullet point 1 and reference to locally listed building.	Support noted	No change	AGREED
GNLP 0401	23984	Support	We welcome the new wording in criterion 2 in relation to heritage assets.	Support noted	No change	AGREED
GNLP 0409AR	23985	Object	<p>We welcome the reference to the heritage assets in paragraphs 2.56 – 2.62.</p> <p>We suggest that the first sentence of criterion 2 is moved to later in the criterion, perhaps as the penultimate sentence in this paragraph.</p> <p>Criterion 3 Should read character or appearance in line with legislation</p>	<p>Regard has been had to heritage issues as part of the site assessment process. Further heritage assessment has been undertaken which does not raise any insurmountable difficulties for the development. However, any development will need to be undertaken sensitively with regard to the heritage assets. This</p>	<p>A factual correction is proposed as an Additional Modification: add additional Criterion in policy: “The site is located within The Area of Main Archaeologica</p>	<p>AGREED factual correction re archaeology.</p> <p>DISAGREED UNLESS THE PROPOSED MODIFICATIONS ARE MADE We welcome the completion of a heritage statement for the site in Summer 2021.</p>

Greater Norwich Local Plan (GNLP)

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			<p>The policy would be further improved by including reference to the Area of Main Archaeological Interest into the policy.</p> <p>Again we suggest a more detailed HIA is prepared for this site.</p>	<p>is recognised in paragraphs 2.56 – 2.57 and criteria 2 and 3 which require the preservation and enhancement of the significance of the heritage assets. If the Inspector feels that it is appropriate, the GNLP authorities have no objection in principle to Proposed Modifications being made for the suggestions that: the first sentence of criterion 2 is moved to later in the criterion, perhaps as the penultimate sentence in this paragraph; and that Criterion 3 should read character or appearance in line with legislation; and that a criterion is added: “An appropriate programme of</p>	<p>I Interest. An archaeological assessment will be required as part of a planning application”</p> <p>The GNLP authorities have no objection in principle to Proposed Modifications being made to: move the first sentence of criterion 2 to become the penultimate sentence; and for Criterion 3 to read “character or</p>	<p>It provides a helpful summary of the of position including in relation to the permission currently being implemented.</p> <p>The assessment includes a helpful set of recommendations most of which are already included in the policy.</p> <p>However, reference should also be added in the policy to archaeology.</p> <p>To that end we recommend the following change to policy:</p> <p>Add new criterion to read:</p>

Greater Norwich Local Plan (GNLP)

Policy/ Map/ Para no. etc	Rep ID/s	Support/ Object	Main Issues Raised	Council response	Potential change to plan	Historic England response
				<p>archaeological mitigation should be carried out”.</p> <p>Archaeological importance is included under heritage assets and so addressed under Norwich City Council’s existing adopted Development Management Policy 9 ‘Safeguarding Norwich’s heritage’, GNLP policy 3 Environmental Protection and Enhancement as well as within the NPPF. However, in recognition of the concentration of archaeology within Norwich an “area of main archaeological interest” has previously been identified that includes the site in question. A reference highlighting this in policy could usefully be included for those sites</p>	<p>appearance”; and that a criterion is added: “An appropriate programme of archaeological mitigation should be carried out”.</p>	<p><u>An appropriate programme of archaeological mitigation should be carried out.</u></p>

Greater Norwich Local Plan (GNLP)

Policy/ Map/ Para no. etc	Rep ID/s	Support/ Object	Main Issues Raised	Council response	Potential change to plan	Historic England response
				affected by it, and so a factual correction is proposed as a minor modification to the Plan.		
GNLP 0409BR	23986	Object	<p>Criterion 2 would be improved by using the phrase 'conserve and enhance the significance of heritage assets (including any contribution made to that significance by setting)'</p> <p>Again continue to suggest a more detailed HIA is prepared for this site.</p>	<p>Regard has been had to heritage issues as part of the site assessment process. Further heritage assessment has been undertaken which does not raise any insurmountable difficulties for the development. However, any development will need to be undertaken sensitively with regard to the heritage assets. This is recognised in paragraphs 2.56 – 2.57 and criteria 1 and 2 which require the preservation and enhancement of the</p>	<p>No change</p> <p>However, the GNLP authorities would not object to a proposed modification being put forward by the Inspector to add to criterion 2: "This should conserve and enhance the significance of heritage assets (including any contribution made to that</p>	<p>DISAGREED UNLESS THE PROPOSED MODIFICATION IS MADE</p> <p>Historic England maintain that the changes suggested in column 4 should be made to the policy.</p> <p>We welcome the completion of a heritage statement for the site in Summer 2021.</p> <p>The assessment includes a helpful set of</p>

Greater Norwich Local Plan (GNLP)

Policy/ Map/ Para no. etc	Rep ID/s	Support/ Object	Main Issues Raised	Council response	Potential change to plan	Historic England response
				<p>significance of the heritage assets.</p> <p>The policy as worded is considered to be sound; however the GNLP authorities would not object to a proposed modification being put forward by the Inspector to add at the end of criterion 2: "This should conserve and enhance the significance of heritage assets (including any contribution made to that significance by setting)", and "An appropriate programme of archaeological mitigation should be carried out".</p>	<p>significance by setting)"; and a new criterion added: "An appropriate programme of archaeological mitigation should be carried out".</p>	<p>recommendations most of which are already included in the policy.</p> <p>However, reference should also be added in the policy to archaeology.</p> <p>To that end we recommend the following change to policy:</p> <p>Add new criterion to read: <u>An appropriate programme of archaeological mitigation should be carried out.</u></p>

Greater Norwich Local Plan (GNLP)

Policy/ Map/ Para no. etc	Rep ID/s	Support/ Object	Main Issues Raised	Council response	Potential change to plan	Historic England response
GNLP 0451	23987	Object	<p>(Unsound) We broadly welcome the revised wording in relation to heritage at criterion 1. We suggest the addition of the words 'the significance' after 'enhances'.</p> <p>The policy would be further improved by including reference to the Area of Main Archaeological Interest into the policy.</p>	<p>The policy as worded is considered to be sound and therefore it is not necessary to make the change suggested in this representation, however the GNLP authorities would not object to a proposed modification being put forward by the Inspector inserting the words '<i>the significance</i>' after 'enhances' in criterion 1.</p> <p>Archaeological importance is included under heritage assets and so addressed under Norwich City Council's existing adopted Development Management Policy 9 'Safeguarding Norwich's heritage', GNLP policy 3 Environmental Protection and Enhancement as well as within the NPPF.</p>	<p>A factual correction is proposed as an Additional Modification: add additional Criterion in policy: "The site is located within The Area of Main Archaeological Interest. An archaeological assessment will be required as part of a planning application"</p> <p>The GNLP authorities would not object to a</p>	AGREED

Greater Norwich Local Plan (GNLP)

Policy/ Map/ Para no. etc	Rep ID/s	Support/ Object	Main Issues Raised	Council response	Potential change to plan	Historic England response
				However, in recognition of the concentration of archaeology within Norwich an “area of main archaeological interest” has previously been identified that includes the site in question. A reference highlighting this in policy could usefully be included for those sites affected by it, and so a factual correction is proposed as a “minor modification” to the Plan.	proposed modification being put forward by the Inspector to insert “ <i>the significance</i> ” after ‘ <i>enhances</i> ’ in criterion 1	
GNLP 0506	23988	Object	<p>Continued significant concerns about this allocation, in particular the scale of the allocation and potential to cause harm to the historic environment.</p> <p>Although scale of development has been reduced from 1250 to 800 in response to Secretary of State’s decision in response to the called in planning application,</p>	Any development will need to be undertaken sensitively with regard to the heritage assets. This is recognised in paragraph 2.73 and criteria 6 and 7 which requires the conservation and enhancement of the significance of the heritage assets.	A factual correction is proposed as an Additional Modification: add additional Criterion in policy: “The site is located within the Area of	<p>AGREED Factual correction re archaeology</p> <p>DISAGREED UNLESS THE PROPOSED MODIFICATION IS MADE Historic England maintain that the</p>

Greater Norwich Local Plan (GNLP)

Policy/ Map/ Para no. etc	Rep ID/s	Support/ Object	Main Issues Raised	Council response	Potential change to plan	Historic England response
			<p>this is still considered too high with the recommendation that this should be closer to 600.</p> <p>It is not clear from the policy wording what scale of other development can be accommodated on site.</p> <p>A Heritage Impact Assessment should be undertaken prior to EiP to inform the allocation and policy wording. Without an HIA, the allocation is not sufficiently justified as the potential impact on the historic environment has not been sufficiently assessed.</p> <p>Criterion 5 & 9 – car parking should be kept to a minimum on site. Welcome reference to low car or car free residential development in policy, however concern raised regarding the reference to decked car parking for the retail element.</p>	<p>Archaeological importance is included under heritage assets and so addressed under Norwich City Council's existing adopted Development Management Policy 9 'Safeguarding Norwich's heritage', GNLP policy 3 Environmental Protection and Enhancement as well as within the NPPF. However, in recognition of the concentration of archaeology within Norwich an "area of main archaeological interest" has previously been identified that includes the site in question. A reference highlighting this in policy could usefully be included for those sites affected by it, and so a factual correction is</p>	<p>Main Archaeological Interest. An archaeological assessment will be required as part of a planning application" The GNLP authorities would not object to a proposed modification being put forward by the Inspector to add the words 'including those' before "at Magdalen Street" in Criterion 7'.</p>	<p>policy should say, 'including those'.</p> <p><u>DISAGREED</u> <u>HE still has concerns in relation to the following 3 main issues:</u> HIA Regarding the HIA, the heritage statement that has been prepared by the city council provides factual information and lists heritage assets.</p> <p>By its own admission the Council's heritage statement <i>'does not attempt to describe how these heritage assets derive their significance in relation to Anglia</i></p>

Greater Norwich Local Plan (GNLP)

Policy/ Map/ Para no. etc	Rep ID/s	Support/ Object	Main Issues Raised	Council response	Potential change to plan	Historic England response
			<p>Criterion 6 Given the concern about the height of development expressed in the judgement, the policy should be amended to make clear that any landmark building should not achieve this status through height exceeding that of existing buildings which form the immediate context of the site.</p> <p>Criterion 7 We broadly welcome the addition of criterion 7 in relation to heritage assets. We suggest that the policy would be improved by adding the words 'including those' before 'at Magdalen Street'. By using the word including, you ensure that you are not accidentally excluding other heritage assets. The criterion should also require a density of development to reflect the character and grain of the area.</p>	<p>proposed as a "minor modification" to the Plan. Reference made to Ash Sakula work supporting an allocation closer to 600 – this was presented at the public inquiry for the Anglia Square planning application, it was acknowledged at the time that this scheme was not viable in the current market conditions.</p> <p>Heritage issues were considered as part of the site assessment process, and a further Heritage Statement has been produced setting out information relating to relevant heritage assets. The potential impacts on the historic environment will need to be fully considered and</p>		<p><i>Square or analyse the impact on the significance of those heritage assets that would result from the development of Anglia Square'. In essence, it is not an assessment.</i></p> <p>Without an HIA, the allocation is not sufficiently justified as the potential impact on the historic environment has not been sufficiently assessed.</p> <p>Scale of Development – Criterion 1 gives no indication of scale of other uses eg office/retail floorspace, number</p>

Greater Norwich Local Plan (GNLP)

Policy/ Map/ Para no. etc	Rep ID/s	Support/ Object	Main Issues Raised	Council response	Potential change to plan	Historic England response
			<p>Criterion 11 It would be helpful to include reinstating the historic street pattern in this criterion.</p> <p>Archaeology The policy would be further improved by including reference to the Area of Main Archaeological Interest into the policy.</p> <p>The representation provides suggested revised wording for criterion 5,6,7,11.</p>	<p>addressed as part of any future planning application. However given that there are no designated assets within the site allocation site and therefore no such assets would be physically affected by the proposal, the main issue for consideration is the impact on the setting of the assets in question. Many of the site's current buildings and car parks are identified as negative features in the Norwich City Centre Conservation Area Appraisal and in principle the replacement of these existing commercial buildings and car parks with well-designed modern buildings would be a significant benefit to the area. Therefore it would</p>		<p>of student accommodation units etc. Without this information it is difficult to assess the acceptability of the overall impact of development.</p> <p>Viability HE has suggested that a figure closer to 600 dwellings might be more appropriate. The Council state that the Ash Sakula scheme, for 600 dwellings presented at the public inquiry, was not viable under current market conditions.</p> <p>However, surely the overall viability of the scheme will</p>

Greater Norwich Local Plan (GNLP)

Policy/ Map/ Para no. etc	Rep ID/s	Support/ Object	Main Issues Raised	Council response	Potential change to plan	Historic England response
				<p>seem that there is no reason why appropriate development cannot be achieved in principle; subject to the consideration of the following at the planning application stage.</p> <ul style="list-style-type: none"> • impact upon the conservation area, • impact upon listed buildings and other designated heritage assets in proximity to the site • impact on middle distance and long views. <p>Details such as height of buildings, car-parking etc would need to be determined as part of the consideration of a specific proposal through a planning application.</p>		<p>depend on market conditions (which change over time), the precise mix of uses and also the availability of public subsidy. This issue needs further exploration and justification.</p>

Greater Norwich Local Plan (GNLP)

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				The policy as worded is considered to be sound and therefore it is not necessary to make the changes suggested, however the GNLP authorities would not object to a proposed modification being put forward by the Inspector to add the words 'including those' before 'at Magdalen Street in Criterion 7'.		
GNLP 1061R	23989	Object	(Unsound) There are no heritage assets within the site boundary. However, to the north west of the site lies the Horsham St Faith Conservation Area and a number of associated listed buildings including the grade I listed Church of the Blessed Virgin and St Andrew and the grade I listed and scheduled Priory as well as numerous grade II listed buildings. Development on the	The policy as worded is considered to be sound and therefore it is not necessary to make the change suggested in this representation, however the GNLP authorities would not object to a proposed modification being put forward by the Inspector inserting an additional criterion 'to conserve and enhance	No change However the GNLP authorities would not object to a Proposed Modification being put forward by the Inspector to	DISAGREED UNLESS THE PROPOSED MODIFICATION IS MADE Historic England maintain that the policy should make reference to the assets to the north as set out in the 5 th column.

Greater Norwich Local Plan (GNLP)

Policy/ Map/ Para no. etc	Rep ID/s	Support/ Object	Main Issues Raised	Council response	Potential change to plan	Historic England response
			<p>airport site has the potential to impact upon these heritage assets.</p> <p>To that end, we suggest that a criterion is added to the policy to conserve and enhance the significance of the Horsham St Faith Conservation Area, listed buildings including the Grade I listed Church of the Blessed Virgin and St Andrew and the grade I listed and scheduled Priory as well as numerous grade II listed buildings (including any contribution made to tier significance by setting)</p>	<p>the significance of the Horsham St Faith Conservation Area, listed buildings including the Grade I listed Church of the Blessed Virgin and St Andrew and the grade I listed and scheduled Priory as well as numerous grade II listed buildings (including any contribution made to their significance by setting) into the policy.</p>	<p>insert an additional criterion: “to conserve and enhance the significance of the Horsham St Faith Conservation Area, listed buildings including the Grade I listed Church of the Blessed Virgin and St Andrew and the grade I listed and scheduled Priory as well as numerous grade II listed buildings (including any contribution made to their</p>	

Greater Norwich Local Plan (GNLP)

Policy/ Map/ Para no. etc	Rep ID/s	Support/ Object	Main Issues Raised	Council response	Potential change to plan	Historic England response
					significance by setting)	
GNLP 2114	23990	Support	We welcome the changes made to the policy wording to include specific reference to heritage assets.	Support noted Archaeological importance is included under heritage assets and so addressed under Norwich City Council's existing adopted Development Management Policy 9 'Safeguarding Norwich's heritage', GNLP policy 3 Environmental Protection and Enhancement as well as within the NPPF. However, in recognition of the concentration of archaeology within Norwich an "area of main archaeological interest" has previously been	A factual correction is proposed as an Additional Modification: add additional Criterion in policy: "The site is located within the Area of Main Archaeological Interest. An archaeological assessment will be required as part of a	AGREED

Greater Norwich Local Plan (GNLP)

Policy/ Map/ Para no. etc	Rep ID/s	Support/ Object	Main Issues Raised	Council response	Potential change to plan	Historic England response
				identified that includes the site in question. A reference highlighting this in policy could usefully be included for those sites affected by it, and so a factual correction is proposed as a “minor modification” to the Plan.	planning application”	
GNLP 2163	23991	Support	We welcome the changes made to the policy wording to include specific reference to heritage assets, grain and massing and archaeology on this site. Paragraph 2.85 also provides helpful supporting text in relation to heritage.	Support noted	No change	AGREED
GNLP 2164	23992	Support	GNLP 2164 Land west of Eastgate House, Thorpe Road Sound We welcome the reference to the Conservation Area in this policy.	Support noted	No change	AGREED

Greater Norwich Local Plan (GNLP)

Policy/ Map/ Para no. etc	Rep ID/s	Support/ Object	Main Issues Raised	Council response	Potential change to plan	Historic England response
GNLP 3054	23993	Object	<p>Supporting text at paragraphs 2.93 - 2.98 provide helpful context in relation to heritage and the site.</p> <p>It is suggested that a detailed HIA is prepared for the site</p> <p>Criteria 3,4 and 6 welcomed</p> <p>Criteria 1 and 5 should read “character <u>or</u> appearance in line with legislation (rather than character <u>and</u> appearance as currently written)</p> <p>Criterion 2 We suggest that the first sentence of criterion 2 is moved to later in the criterion, perhaps as the penultimate sentence in this paragraph. The final sentence of this is not quite right - significance can in part be derived from setting. The sentence would be better if it read ‘conserve and enhance</p>	<p>Archaeological importance is included under heritage assets and so addressed under Norwich City Council’s existing adopted Development Management Policy 9 ‘Safeguarding Norwich’s heritage’, GNLP policy 3 Environmental Protection and Enhancement as well as within the NPPF. However, in recognition of the concentration of archaeology within Norwich an “area of main archaeological interest” has previously been identified that includes the site in question. A reference highlighting this in policy could usefully be included for those sites affected by it, and so a factual correction is</p>	<p>A factual correction is proposed as an Additional Modification: add additional Criterion in policy: “The site is located within the Area of Main Archaeological Interest. An archaeological assessment will be required as part of a planning application”.</p> <p>Also, a factual correction as an Additional Modification to</p>	<p>AGREED factual change re archaeology.</p> <p>We welcome the completion of a heritage statement for the site in Summer 2021.</p> <p>It provides a helpful summary of the of planning history and site context.</p> <p>The assessment includes a helpful set of recommendations.</p> <p>There are already several heritage criteria in the Local Plan policy. These are closely aligned with the heritage statement, and</p>

Greater Norwich Local Plan (GNLP)

Policy/ Map/ Para no. etc	Rep ID/s	Support/ Object	Main Issues Raised	Council response	Potential change to plan	Historic England response
			<p>significance of the designated and non-designated heritage assets both on-site and off-site (including any contribution made to that significance by setting)</p> <p>The policy would be further improved by including reference to the Area of Main Archaeological Interest into the policy</p>	<p>proposed as a “minor modification” to the Plan.</p> <p>Regard has been had to heritage issues as part of the site assessment process. Further heritage assessment has been undertaken which does not raise any insurmountable difficulties for the development. However, any development will need to be undertaken sensitively with regard to the heritage assets. This is recognised in paragraph 2.93 – 2.98 and criteria 1,2,3,4,5,6 and 11 which address heritage assets.</p> <p>The policy as worded is considered to be sound and therefore it is not necessary to make the</p>	<p>the second sentence of criteria 2: delete reference to listed buildings on site (as there are none within the defined red line boundary) to state: Proposals will include the protection of the locally listed buildings on the site and the enhancement of the significance of the setting of designated heritage</p>	<p>possibly better in Local Plan.</p> <p>DISAGREED UNLESS THE PROPOSED MODIFICATION TO 1, 2 and 5 IS MADE _Historic England maintain that the policy should be amended to include the changes suggested to criteria 1, 2 and 5</p>

Greater Norwich Local Plan (GNLP)

Policy/ Map/ Para no. etc	Rep ID/s	Support/ Object	Main Issues Raised	Council response	Potential change to plan	Historic England response
				change suggested, however the GNLP authorities would not object to a proposed modification being put forward by the Inspector in accordance with those suggested by Historic England in this representation relating to the wording of criteria 1,2,5	assets both on and off site The GN authorities have no objection in principle to Proposed Modifications being made for: - Criteria 1 and 5 to read “character <u>or</u> appearance” (rather than character <u>and</u> appearance); - Criterion 2 the first sentence is moved to later in the criterion, as the penultimate sentence in the	

Policy/ Map/ Para no. etc	Rep ID/s	Support/ Object	Main Issues Raised	Council response	Potential change to plan	Historic England response
					paragraph; and the final sentence to read ‘conserve and enhance significance of the designated and non-designated heritage assets both on-site and off-site (including any contribution made to that significance by setting)’.	
East Norwich (2.8)	23978	Support	We welcome the references in the supporting text to heritage at paragraphs 2.8, 2.10(vii), 2.13, 2.18-2.21	Support noted	No change	AGREED

Greater Norwich Local Plan (GNLP)

Policy/ Map/ Para no. etc	Rep ID/s	Support/ Object	Main Issues Raised	Council response	Potential change to plan	Historic England response
East Norwich 0360/3053 /R10	23979	Object	<p>There are numerous designated heritage assets affected by these sites, any development of these sites has the potential to affect these designated heritage assets and their settings.</p> <p>We are very concerned about the very high number of dwellings (4000, rather than previously 2000 in Reg 18 Plan) anticipated from this area. This is likely to give rise to very high-density development on the sites, which may have a harmful impact on the historic environment.</p> <p>Continue to strongly advise that the HIA should be prepared for the whole site ahead of the EiP to inform the allocation and in particular the capacity of the site. The HIA should then inform the masterplan.</p>	<p>Any development will need to be undertaken sensitively with regard to the heritage assets. This is recognised in paragraph 2.10 vii, 2.13,2.18, 2.19, 2.20,2.21, and criteria 6, Deal Ground criteria 3, Carrow Works criteria 1 & 2, Utilities site criteria 1.</p> <p>Heritage issues were considered as part of the site assessment process, and a further Heritage Statement has been produced setting out how heritage will be considered at the masterplan stage. The potential impacts on the historic environment will need to be fully considered and addressed as part of the masterplanning process</p>	<p>No change.</p> <p>However, he GNLP authorities would not object to a proposed modification to the third sentence of criterion 6 to read 'conserve or where opportunities arise enhance the character or appearance of the conservation areas'</p>	<p>DISAGREED</p> <p>Unfortunately there has been no heritage impact assessment completed for the site to inform the capacity of the site.</p> <p>The heritage statement that has been produced by GNLP in summer 2021 is not a Heritage Impact Assessment but simply describes what they are planning to do. A separate Heritage Appraisal has been prepared by Cotswold Archaeology as part of the masterplanning exercise but again</p>

Greater Norwich Local Plan (GNLP)

Policy/ Map/ Para no. etc	Rep ID/s	Support/ Object	Main Issues Raised	Council response	Potential change to plan	Historic England response
			<p>We suggest that the first sentence is moved to later in the criterion, perhaps as the penultimate sentence in this paragraph.</p> <p>In the third sentence, the wording for the conservation areas should be amended to read 'conserve or where opportunities arise enhance the character or appearance of the conservation areas'</p> <p>Criterion 12 relating to archaeology welcomed.</p> <p><u>Deal Ground</u> – Criterion 3 broadly welcomed: but suggest that the phrase 'and reuse encouraged' be replaced with 'required together with a future maintenance scheme for the asset.</p> <p><u>Carrow Works</u> – H.E have particular concerns about this</p>	<p>and as part of any future planning application. There is a high concentration of heritage assets in and adjacent to the site and development must protect and enhanced these assets and their setting as well as having regard to the character and appearance of the conservation area and long views from, into and across the sites. However much of the site is disused former industrial land and buildings and comprehensive redevelopment of the site has the potential to be of significant benefit to the area. There is no reason why appropriate development cannot be achieved in principle on the site; subject to the</p>		<p>this is not really a heritage impact assessment but is more of a baseline assessment and mainly focusses on listing the various heritage assets on site and their significance.</p> <p>Therefore, we have some concerns that the evidence has not been prepared to support the allocation in advance – i.e. allocation not justified/based on evidence.</p> <p>We are encouraged that the master-planning process is including some heritage baseline</p>

Greater Norwich Local Plan (GNLP)

Policy/ Map/ Para no. etc	Rep ID/s	Support/ Object	Main Issues Raised	Council response	Potential change to plan	Historic England response
			<p>site, given the heritage assets within. Reference to demolition of locally listed buildings in bullet 1 is unhelpful & gives wrong emphasis in relation to conservation and enhancement of heritage assets. Suggest that this is reframed in a more positive manner.</p> <p>There are a number of unlisted former Colman's industrial buildings that are of some historic interest – potential to retain and adapt these buildings should be identified at para 2.10, vii.</p> <p><u>Utilities Site</u> – Reference to heritage significance of site welcomed.</p> <p><u>ATB Lawrence Scott</u> – detail of this section of the site is lacking/unclear</p>	<p>consideration of the following at the masterplanning and planning application stage.</p> <ul style="list-style-type: none"> • impact upon the conservation area, • impact upon scheduled monuments, listed buildings and other designated heritage assets on and near the site • impact on key views <p>The policy as worded is considered to be sound and therefore it is not necessary to make the changes suggested, however the GNLP authorities would not object to a proposed modification being put forward by the Inspector</p>		<p>assessment (The Cotswold Archaeology Heritage Appraisal). This initial assessment should ideally be expanded to assess the likely impact of development on significance of heritage assets, include some broad recommendations on key heritage issues that will need to be addressed in the Local Plan policy (including potential mitigation and enhancement measures). This should inform both the policy and then the masterplan.</p>

Greater Norwich Local Plan (GNLP)

Policy/ Map/ Para no. etc	Rep ID/s	Support/ Object	Main Issues Raised	Council response	Potential change to plan	Historic England response
				to the third sentence of criterion 6 to read 'conserve or where opportunities arise enhance the character or appearance of the conservation areas		One of our key concerns is potentially designateable assets. Also concern for capacity of site as a whole. This program for the masterplan should also factor in time for a review of statutory designations.
COL1	24019	Support	<p>Remaining issues in relation to the soundness of the Plan and the protection of the historic environment.</p> <p>We welcome the addition of criterion 16 and 19 in relation to heritage assets and archaeology.</p>	Comment noted	None	AGREED

Greater Norwich Local Plan (GNLP)

Policy/ Map/ Para no. etc	Rep ID/s	Support/ Object	Main Issues Raised	Council response	Potential change to plan	Historic England response
COL2 (GNLP 0140C)	24020	Support	We welcome the addition of criterion 1 in relation to heritage assets	Comment noted	None	AGREED
BAW2	24022	Support	On behalf of Historic England, we welcome criterion 2 regarding the conservation management plan.	Comment noted	No change	AGREED
GNLP 0253	24021	Object	Unsound - Colney Hall is located at the heart of this allocation. It is a late 18th century house with attached orangery listed at grade II. The allocation is for specialist housing for older people, university research and healthcare facilities. We note that criterion 4 refers to sensitive conversion of the Grade II listed Hall and its gardens. We also note and welcome criterion 6 in relation to archaeology. Given the scale of this development and the fact that development	Regard has been had to heritage issues as part of the site assessment process. Further heritage assessment has been undertaken which does not raise any insurmountable difficulties for the development. However, any development will need to be undertaken sensitively with regard to the heritage assets.	No change However, there is no objection to a Proposed Modification to: amend the second sentence of criterion 1 to state: “ <u>A landscape assessment exploring the historic</u> ”	DISAGREED UNLESS THE PROPOSED MODIFICATION IS MADE We welcome the completion of a heritage statement for the site in Summer 2021. The assessment includes a helpful set of recommendations

Greater Norwich Local Plan (GNLP)

Policy/ Map/ Para no. etc	Rep ID/s	Support/ Object	Main Issues Raised	Council response	Potential change to plan	Historic England response
			would surround the listed building, we suggest that an HIA is prepared.	Although the Policy is believed to be sound, the GN authorities have no objection in principle to a Proposed Modification being made to refer to a landscape assessment as suggested by HE.	<u>gardens and parkland setting of the Hall will need to be undertaken.</u> The layout of the development will need to <u>reflect this assessment</u> and retain the significant trees across the site, incorporate high quality landscaping to enhance the woodland setting and provide informal recreational green space”.	most of which are already included in the policy. However, in our view the historic gardens and parkland setting has not been fully explored in the Heritage Statement. It is also important that any new development conserves and enhances this historic garden and parkland setting. Therefore, we recommend separating criterion 1 into 2 and adding additional wording to read:

Greater Norwich Local Plan (GNLP)

Policy/ Map/ Para no. etc	Rep ID/s	Support/ Object	Main Issues Raised	Council response	Potential change to plan	Historic England response
						<p>A masterplan for the whole site. Comprising a mix of uses that is majority C2 but includes research E(gii) and healthcare D1 facilities to make the development exceptional for wellbeing in later life.</p> <p><u>A landscape assessment exploring the historic gardens and parkland setting of the Hall will need to be undertaken.</u> The layout of the development will need to <u>reflect this assessment and</u> retain the significant trees across the</p>

Greater Norwich Local Plan (GNLP)

Policy/ Map/ Para no. etc	Rep ID/s	Support/ Object	Main Issues Raised	Council response	Potential change to plan	Historic England response
						site, incorporate high quality landscaping to enhance the woodland setting and provide informal recreational green space.
KES2/ 0497, KES2	24023	Support	We welcome the changes made to include criterion 8 in relation to the grade II listed church and remains of the Church of All Saints.	Comment noted	No change	AGREED
DRA1	24024	Support	HE welcomes the addition of the last two sentences of this policy that refer to the grade II listed 4 Manor Farm Close. We note the policy needs formatting with numbered bullets.	Comment noted There is no objection to formatting as suggested.	Numbering the bullet points is proposed to be done as an additional modification.	AGREED

Greater Norwich Local Plan (GNLP)

Policy/ Map/ Para no. etc	Rep ID/s	Support/ Object	Main Issues Raised	Council response	Potential change to plan	Historic England response
EAS1	24025	Support	Welcome criteria 8 and 9 and particularly the changes to 9 to make specific reference to St Peters Church	Comment noted	No change	AGREED
HEL1	24026	Support	Welcome bullet point 4	Comment noted	No change	AGREED
GNLP 0172 Rackheat h	24027	Support	We welcome the changes to criterion 6 to make it absolutely clear that land to the west of the A1270 should only be used for open space and to conserve and where opportunities arise enhance the grade II listed Rackheath Hall and bridge.	Comment noted	No change	AGREED
GNLP 0132 Rackheat h	24028	Support	Although Rackheath Hall, grade II listed lies to the east of the site, the intervening vegetation should provide a suitable buffer. We welcome the reference to the historic parkland and need for	Comment noted	No change	AGREED

Greater Norwich Local Plan (GNLP)

Policy/ Map/ Para no. etc	Rep ID/s	Support/ Object	Main Issues Raised	Council response	Potential change to plan	Historic England response
			protection of trees in bullet point 6.			
TROW1	24029	Support	We welcome the changes made to this policy to include specific reference to the Trowse Conservation Area.	Comment noted	No change	AGREED
Site Assessme nt Booklets and Studies, Norwich and Urban Fringe Assessme nt Booklets	24534	Object	Site assessments appear to be lacking. The assessments do not follow the 5 step methodology set out in HE advice note 3. They do not properly consider the significance of the heritage assets, the impact of development upon the significance of those assets and do not consider mitigation and enhancement. This is of particular concern for sites where additional HIA was	Regard has been had to heritage issues as part of the site assessment process. Further heritage assessment has been undertaken which does not raise any insurmountable difficulties for the development. However, any development will need to be undertaken sensitively with regard to the heritage assets.	No change	DISAGREED We welcome completion of most of the Heritage Statements in June 2021 to support the allocations. However, we remain concerned about the absence of evidence to support the East Norwich and Anglia Square allocations.

Greater Norwich Local Plan (GNLP)

Policy/ Map/ Para no. etc	Rep ID/s	Support/ Object	Main Issues Raised	Council response	Potential change to plan	Historic England response
			<p>recommended at reg 18 but has not been carried out.</p> <p>We continue to advise that these HIAs should be prepared; this is imperative to ensure a robust evidence base for the Local Plan. These should be prepared in advance of the EiP. This is a matter of priority, given the timetable for the Plan.</p> <p>Concerns regarding the indicative capacity of a number of sites. HE consider that Norwich's historic character is under pressure.. we consider that it is essential evidence base document is prepared outlining the site capacities and the assumptions that have been made in reaching these figures, particularly for the sites in the City. The evidence should set out the indicative site capacity, site area, density (as dwellings per hectare dph), assumed</p>			

Greater Norwich Local Plan (GNLP)

Policy/ Map/ Para no. etc	Rep ID/s	Support/ Object	Main Issues Raised	Council response	Potential change to plan	Historic England response
			maximum height, surrounding heights of development, other on site and off site capacity considerations (e.g. heritage, natural environment etc.). This will provide a helpful starting point for us to be able to consider whether the indicative site capacities are justified, realistic and achievable in terms of their impact upon the historic environment (and other factors).			
GNLP 0311 0595 2060 0596R Aylsham	24030 24031	1 Support 1 Object	<p>In relation to GNLP0311/0595/2060, we welcome the change at bullet point 8 to specifically reference Bure Valley Farmhouse.</p> <p>In relation to GNLP0596R, Diggens Farmhouse, which is a listed as grade II, lies to the east of the site. We welcome criterion 8 that specifically references the asset but suggest that mention should also be made of the need to include open space and landscaping at the eastern end</p>	<p>The comment is noted and further heritage assessment work has been undertaken in relation to GNLP0596R and the neighbouring Diggens Farmhouse.</p> <p>The GNLP authorities would not object to a Proposed Modification being put forward by the Inspector to amend criteria 8 as suggested by HE.</p>	<p>No change</p> <p>However, the GNLP authorities would not object to a Proposed Modification being put forward by the Inspector to: At end of criterion 8 add:</p>	<p>DISAGREED UNLESS THE PROPOSED MODIFICATION IS MADE</p> <p>We welcome the completion of a Heritage Statement for the site in Summer 2021.</p> <p>It provides a helpful assessment of the</p>

Greater Norwich Local Plan (GNLP)

Policy/ Map/ Para no. etc	Rep ID/s	Support/ Object	Main Issues Raised	Council response	Potential change to plan	Historic England response
			of the site to protect the significance of the asset. We suggest a detailed HIA is undertaken for this site prior to EIP to assess the suitability or otherwise of the site and consider any appropriate mitigation.		<p><u>“Mitigation measures should have regard to the recommendations of the Heritage Statement (June 2021) and include careful design and layout, an area of open space to the west of Diggins Farmhouse and enhanced tree and hedgerow planting”.</u></p>	<p>heritage issues relating to the site.</p> <p>The assessment makes a number of helpful recommendations regarding mitigation (see paras 8.2 and 6.3 of the Heritage Statement) which will ensure that the policy is effective in conserving and enhancing the historic environment.</p> <p>These various mitigation measures should be more closely reflected in the policy.</p> <p>To that end we recommend the</p>

Greater Norwich Local Plan (GNLP)

Policy/ Map/ Para no. etc	Rep ID/s	Support/ Object	Main Issues Raised	Council response	Potential change to plan	Historic England response
						<p>following change to policy:</p> <p>At end of criterion 8 add: <u>Mitigation measures should have regard to the recommendations of the Heritage Statement (June 2021) and include careful design and layout, an area of open space to the west of Diggens Farmhouse and enhanced tree and hedgerow planting.</u></p>
GNLP 2108	24032	Support	Policy GNLP2108 Land south of Spirketts Lane We welcome the changes to criterion 4 to reference the listed buildings	Comment noted	No change	AGREED

Greater Norwich Local Plan (GNLP)

Policy/ Map/ Para no. etc	Rep ID/s	Support/ Object	Main Issues Raised	Council response	Potential change to plan	Historic England response
HAR5	24535	Support	We welcome the changes to criterion 4 to reference the listed buildings	Comment noted	No change	AGREED
GNLP 2109	24033	Object	Whilst we welcome the reference to the grade II listed building at criterion 4, the policy needs to say that there is a need to conserve and where appropriate enhance the significance of the heritage asset including any contribution made to that significance by setting. It is more than just protecting residential amenity. We continue to suggest a detailed HIA is undertaken for this site to assess the suitability or otherwise of the site and consider any appropriate mitigation.	The comment is noted about enhancing nearby heritage assets and their setting. Further heritage assessment work has been undertaken in relation to GNLP2109. The policy is believed to be sound; however the GNLP authorities would not object to a proposed modification being put forward by the Inspector as suggested by HE.	No change However the GNLP authorities would not object to a proposed modification being put forward by the Inspector to amend criteria 4 to: “Layout, <u>height</u> and design to protect the residential amenity and <u>conserve and enhance the</u>	DISAGREED UNLESS THE PROPOSED MODIFICATION IS MADE HE maintain that the policy wording should be amended. We welcome the completion of a Heritage Statement for the site in Summer 2021. It provides a helpful assessment of the heritage issues relating to the site.

Greater Norwich Local Plan (GNLP)

Policy/ Map/ Para no. etc	Rep ID/s	Support/ Object	Main Issues Raised	Council response	Potential change to plan	Historic England response
					<p><u>significance</u> of the nearby Grade II Little Potash (Brunel House)".</p>	<p>The assessment makes a number of helpful recommendations regarding mitigation which will ensure that the policy is effective in conserving and enhancing the historic environment.</p> <p>Some of these are already included in the policy, others are not.</p> <p>Therefore, we recommend the following amendment to policy</p> <p>4 Layout, <u>height</u> and design to protect the residential amenity</p>

Greater Norwich Local Plan (GNLP)

Policy/ Map/ Para no. etc	Rep ID/s	Support/ Object	Main Issues Raised	Council response	Potential change to plan	Historic England response
						and <u>conserve and enhance the significance</u> of the nearby Grade II Little Potash (Brunel House).
Hethel 2	24034	Object	<p>Whilst there are no designated heritage assets within the site boundary, the grade II listed Little Potash/Brunel House and Corporation Farmhouse lie to the east of the site.</p> <p>There is currently no mention of these heritage assets in the policy or supporting text or of the need to conserve and enhance the significance of the heritage assets (including any contribution made to that significance by setting). We suggest that the policy be amended to refer to these heritage assets and the need to conserve and enhance them and also to the need for appropriate</p>	The policy as worded is considered to be sound. However, the GNLP authorities would not object to a proposed modification being put forward by the Inspector to make the change suggested by HE.	No change However the GNLP authorities would not object to a proposed modification being put forward by the Inspector to: reference the Grade II listed Little Potash/Brunel House and Corporation Farmhouse that	<p>DISAGREED UNLESS THE PROPOSED MODIFICATION IS MADE</p> <p>HE maintains that the policy should reference the grade II listed Little Potash/Brunel House.</p>

Greater Norwich Local Plan (GNLP)

Policy/ Map/ Para no. etc	Rep ID/s	Support/ Object	Main Issues Raised	Council response	Potential change to plan	Historic England response
			landscaping along the eastern edge of the site.		lie to the east of the site.	
GNLP 0354R	24035	Support	We welcome bullet point 4 relating to listed buildings and the Conservation Area.	Comment noted	No change	AGREED
BLO1	24036	Support	We welcome the addition of criterion 2 that references the grade II listed Manor Farm Barn to the south of the site.	Comment noted	No change	AGREED
HET1	24037	Support	We welcome the reference to archaeology at criterion 18.	Comment noted	No change	AGREED

Greater Norwich Local Plan (GNLP)

Policy/ Map/ Para no. etc	Rep ID/s	Support/ Object	Main Issues Raised	Council response	Potential change to plan	Historic England response
GNLP 0520 Hingham	24038	Support	We welcome the addition of criterion 9 to reference the two grade II listed buildings (Lilac Farmhouse and Blenheim Cottage) to the south of the site.	Comment noted	No change	AGREED
HIN2	24039	Support	We welcome the addition of criterion 4 to reference the grade II listed Alexander's Farmhouse lies to the east of the site and White Lodge, also listed at grade II lies to the north of the site.	Comment noted	No change	AGREED
GNLP 0312 Loddon & Chedgrave	24040	Support	We welcome the addition of criterion 3 to reference the listed buildings and conservation area.	Comment noted	No change	AGREED
GNLP046 3R Loddon & Chedgrave	24041	Support	We welcome the addition of criterion 2 to reference the listed buildings and Langley Park registered park and garden	Comment noted	No change	AGREED

Greater Norwich Local Plan (GNLP)

Policy/ Map/ Para no. etc	Rep ID/s	Support/ Object	Main Issues Raised	Council response	Potential change to plan	Historic England response
COL2	24042	Support	Welcome the addition of criterion 4 to reference the nearby listed limekiln and conservation area.	Comment noted	No change	AGREED
GNLP 0605 Foulsham	24043	Support	Welcome the addition of criterion 2 to reference the nearby listed buildings and conservation area	Comment noted	No change	AGREED
FOU2	24044	Support	Welcome the addition of criterion 6 to reference the nearby conservation area	Comment noted	No change	AGREED
FRE1	24045	Support	Welcome the addition of criterion 4 to reference the nearby listed buildings and requirement for landscaping along the northern boundary	Comment noted	No change	AGREED

Greater Norwich Local Plan (GNLP)

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GNLP 0608R Great Witchingh am etc	24046	Support	Welcome the reference to the listed building at criterion 3	Comment noted	No change	AGREED
GNLP 0125R Horsham & Newton St Faith	24047	Object	Soundness objection raised as this is a sensitive site in terms of potential impact upon multiple heritage assets, some of which are highly graded. Welcome the reference to the church, scheduled Priory and conservation area but continue to suggest that a more detailed Heritage Impact Assessment should be undertaken in advance of the EIP and the findings should inform the policy wording.	Regard has been had to heritage issues as part of the site assessment process. Further heritage assessment has been undertaken which does not raise any insurmountable difficulties for the development. However, any development will need to be undertaken sensitively with regard to the heritage assets. This is recognised in paragraph 6.73 and policy criteria 4 which requires the conservation and enhancement of the significance of the heritage assets and the	No change However the GNLP authorities would not object to a Proposed Modification being put forward by the Inspector to: Amend criterion 4 to read: “...setting. <u>Mitigation measures should have regard to the recommendations of the</u>	DISAGREED UNLESS THE PROPOSED MODIFICATION IS MADE We welcome the completion of a Heritage Statement for the site in Summer 2021. It provides a helpful assessment of the heritage issues relating to the site. The assessment makes a number of helpful recommendations

Greater Norwich Local Plan (GNLP)

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				submission of a Heritage Impact Assessment as part of any planning application. However the GNLP authorities would not object to a Proposed Modification being put forward by the Inspector to include the amendment to criterion 4 suggested by HE.	<u>Heritage Statement (June 2021) and include sensitive design, height and layout, protection of views to and from site and open space on north eastern edge of site. An appropriate programme of archaeological mitigatory work should be completed.</u> Due to the sensitivities of this site a Heritage Impact Assessment will be required.	<p>regarding mitigation which will ensure that the policy is effective in conserving and enhancing the historic environment..</p> <p>These various mitigation measures should be more closely reflected in the policy.</p> <p>To that end we recommend the following change to policy:</p> <p>Amend criterion 4 to read:</p> <p>...setting. This includes but is not limited to a</p>

Greater Norwich Local Plan (GNLP)

Policy/ Map/ Para no. etc	Rep ID/s	Support/ Object	Main Issues Raised	Council response	Potential change to plan	Historic England response
						<p><u>Mitigation measures should have regard to the recommendations of the Heritage Statement (June 2021) and include sensitive design, height and layout, protection of views to and from site and open space on north eastern edge of site.</u></p> <p><u>An appropriate programme of archaeological mitigatory work should be completed.</u> Due to the sensitivities of this site a Heritage Impact Assessment will be required.</p>

Greater Norwich Local Plan (GNLP)

Policy/ Map/ Para no. etc	Rep ID/s	Support/ Object	Main Issues Raised	Council response	Potential change to plan	Historic England response
HNF1	24048	Support	Welcome the addition of criterion 6 to reference the nearby listed buildings and requirement for landscaping along the eastern boundary.	Comment noted	No change	AGREED
SL2007, 4016, HNF3	24049	Support	Welcome the reference in relation to archaeology at bullet point 3. The site is separated from Horsham St Faith and its conservation area/listed buildings by the existing industrial estate nevertheless the area is of archaeological sensitivity given the proximity of the scheduled St Faith Priory.	Comment noted	No change	AGREED
GNLP 2143 Marsham	24050	Object	Objection on soundness grounds. No designated assets within the site boundary but a number in close proximity. We welcome the wording at criterion 3 but this is a sensitive site in terms of potential impact upon multiple heritage assets some of which are highly graded and there are some concerns about the allocation of the site.	Regard has been had to heritage issues as part of the site assessment process. Further heritage assessment has been undertaken which does not raise any insurmountable difficulties for the development. However, any development will	No change However, the GNLP authorities would not object to a Proposed Modification being put	DISAGREED UNLESS THE PROPOSED MODIFICATION IS MADE We welcome the completion of a Heritage Statement for the site in Summer 2021.

Greater Norwich Local Plan (GNLP)

Policy/ Map/ Para no. etc	Rep ID/s	Support/ Object	Main Issues Raised	Council response	Potential change to plan	Historic England response
			Continue to suggest that a more detailed Heritage Impact Assessment be undertaken in advance of the EiP . If the site is found suitable the findings of the HIA should inform the policy wording. A concept diagram may also be helpful to show where open space and landscaping would be located.	<p>need to be undertaken sensitively with regard to the heritage assets. This is recognised in paragraph 6.87 and policy criteria 3 which requires the conservation and enhancement of the significance of the heritage assets and the submission of a Heritage Impact Assessment as part of any planning application.</p> <p>However, the GNLP authorities would not object to a Proposed Modification being put forward by the Inspector to amend criteria 3 as suggested by HE.</p> <p>The Heritage Statement for the site will be amended to refer to the WW1 landing ground.</p>	<p>forward by the Inspector to: Replace the last two sentences of criterion 3 with the following: <u>“Mitigation measures should have regard to the recommendations of the Heritage Statement (June 2021 as amended) and include protection of views to and from the church, careful design, height and layout, cemetery extension and open space in</u></p>	<p>It provides a helpful assessment of the heritage issues relating to the site.</p> <p>However, the assessment does not even mention the fact that the site is a First World War Landing Ground that is commemorated by a memorial stone on the edge of the site. This important aspect of Local history should be explored in the Heritage Statement and reference made to it in the policy.</p> <p>We welcome the commitment to amend the heritage statement to</p>

Greater Norwich Local Plan (GNLP)

Policy/ Map/ Para no. etc	Rep ID/s	Support/ Object	Main Issues Raised	Council response	Potential change to plan	Historic England response
					<p><u>eastern part of site to provide buffer to help protect heritage assets and strong landscape buffer to south and east of site. An appropriate programme of archaeological mitigatory work should be carried out".</u></p>	<p>reference the landing ground.</p> <p>The assessment makes a number of helpful recommendations regarding mitigation which will ensure that the policy is effective in conserving and enhancing the historic environment.</p> <p>These various mitigation measures should be more closely reflected in the policy.</p> <p>To that end we recommend the following change to policy:</p>

Greater Norwich Local Plan (GNLP)

Policy/ Map/ Para no. etc	Rep ID/s	Support/ Object	Main Issues Raised	Council response	Potential change to plan	Historic England response
						<p>Replace the last two sentences of criterion 3 with the following: <u>Mitigation measures should have regard to the recommendations of the Heritage Statement (June 2021) and include protection of views to and from the church, careful design, height and layout, cemetery extension and open space in eastern part of site to provide buffer to help protect heritage assets and strong landscape buffer to south and east of site.</u></p>

Greater Norwich Local Plan (GNLP)

Policy/ Map/ Para no. etc	Rep ID/s	Support/ Object	Main Issues Raised	Council response	Potential change to plan	Historic England response
						<u>An appropriate programme of archaeological mitigatory work should be carried out.</u>
GNLP 3003 Reedham	24051	Support	Welcome the reference to the non-designated heritage asset.	Comment noted	No change	AGREED
BKE3 South Norfolk - Non residential	24052	Support	In relation to the wording of the BKE3 Policy we welcome the changes made to criterion 2 in relation to landscaping and boundary treatment. We also welcome the addition of bullet point 3 in relation to Arlington Hall	Comment noted	No change	AGREED
GNLP 0581 2043 Costessey Contingen cy Site,	24053	Object	Within the site boundary, the grade II* listed Lodge Farmhouse lies to the south of the site. To the south west of the site lies the Bawburgh Conservation Area.	Regard has been had to heritage issues as part of the site assessment process. Further heritage assessment has been undertaken which does not raise any	No change However, the GN authorities have no objection to a	DISAGREED UNLESS THE PROPOSED MODIFICATION IS MADE

Greater Norwich Local Plan (GNLP)

Policy/ Map/ Para no. etc	Rep ID/s	Support/ Object	Main Issues Raised	Council response	Potential change to plan	Historic England response
			<p>Changes to plan: We suggest that a more detailed Heritage Impact Assessment be undertaken in advance of the EiP to assess the impact of the proposed development upon the significance of these heritage assets, to establish the suitability or otherwise of the site and to establish appropriate mitigation and enhancement should the site be found suitable.</p>	<p>insurmountable difficulties for the development. However, any development will need to be undertaken sensitively with regard to the heritage assets. Although the Plan is felt to be sound, there are no objections to a Proposed Modification being made to add a criteria on archaeology and heritage assets as suggested by HE.</p>	<p>Proposed Modification to: add an additional criteria: <u>“An appropriate programme of archaeological assessment work should be carried out at an early stage in coordination with Historic Environment Services.</u> <u>Development should conserve and enhance the significance of nearby heritage assets including the grade II* Lodge Farm.</u></p>	<p>We welcome the completion of a Heritage Statement for the site in Summer 2021.</p> <p>It provides a helpful assessment of the heritage issues relating to the site.</p> <p>The assessment makes a number of helpful recommendations regarding mitigation (see section 9) which will ensure that the policy is effective in conserving and enhancing the historic environment.</p> <p>These various mitigation measures</p>

Greater Norwich Local Plan (GNLP)

Policy/ Map/ Para no. etc	Rep ID/s	Support/ Object	Main Issues Raised	Council response	Potential change to plan	Historic England response
					<p><u>Mitigation measures should have regard to the recommendations of the Heritage Statement (June 2021) and include maintaining separation and isolation of Lodge Farm, careful landscaping and highways measures to minimise traffic impacts on the Bawburgh Conservation Area</u>".</p>	<p>should be more closely reflected in the policy.</p> <p>To that end we recommend the following change to policy:</p> <p>Additional criteria:</p> <p><u>An appropriate programme of archaeological assessment work should be carried out at an early stage in coordination with Historic Environment Services.</u></p> <p><u>Development should conserve and enhance the significance of nearby heritage</u></p>

Greater Norwich Local Plan (GNLP)

Policy/ Map/ Para no. etc	Rep ID/s	Support/ Object	Main Issues Raised	Council response	Potential change to plan	Historic England response
						<u>assets including the grade II* Lodge Farm. Mitigation measures should have regard to the recommendations of the Heritage Statement (June 2021) and include maintaining separation and isolation of Lodge Farm, careful landscaping and highways measures to minimise traffic impacts on the Bawburgh Conservation Area.</u>