

# Greater Norwich Local Plan Statement of Common Ground with Historic England

## Representations on G&T Sites Allocations

Date: 12 July 2023

# Greater Norwich Local Plan (GNLP)

## 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 Gypsy and Travellers 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 during the G&T additional focused consultations. 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" 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 G&T Site Allocations Reg 19 is set out in the appended tables. 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  
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## APPENDIX 1 Table of summary of Historic England representations and responses – G&T Site Allocations

Site	Sound/Unsound	Comments	Councils Response	Potential change to plan	Historic England response
GNLP5004 Land off Buxton Road, Eastgate, Cawston	Unsound	<p>The policy states that an archaeological assessment will be required prior to development which is broadly welcomed. The SA recommends that the policy should make it clear whether these should be desk based or field studies. Moreover, in our view, some assessment is needed to inform any planning application. We therefore advise that the criterion should be amended to read, 'Planning applications should be supported by archaeological assessment including the results of field evaluation where appropriate.'</p> <p>The SA also recommends that the landscaping should be species appropriate to the local area.</p> <p><i>Amend policy to state that 'landscaping should be species appropriate to the local area.'</i></p>	<p>Comment noted, amend policy requirements as per HE comments and to support the NPPF para 194 to require that:</p> <p>(3) <u>Desk based archaeological assessment and, if necessary, a programme of archaeological fieldwork, prior to development</u></p> <p><del>3. An archaeological assessment incorporating a field evaluation will be required prior to development.</del></p> <p>Also, policy requirement:</p> <p>(2). Landscaping will be provided to enhance screening and maintain</p>	<p>Amend Site Policy requirements included in Topic paper: Addendum on G&amp;T Sites (<a href="#">H3.1</a>) in response to Historic England's representation to include,</p> <p>3. <u>Desk based archaeological assessment and, if necessary, a programme of archaeological fieldwork, prior to development</u></p> <p><del>3. An archaeological assessment incorporating a field evaluation will be required prior to development.</del></p> <p>These changes were initially considered in the G&amp;T Topic Paper Appendix B: Site Assessment Update (May 2023) (<a href="#">H3.3</a>)</p>	<p><b>AGREED</b> We consider these changes ensure that the policy is effective and in line with the NPPF.</p>

Site	Sound/ Unsound	Comments	Councils Response	Potential change to plan	Historic England response
			<p>the residential amenities of adjoining properties’</p> <p>is considered consistent with the NPPF para 130 c) which states that ‘planning policies should ensure that developments’ are ‘visually attractive as a result of good architecture, layout and appropriate and effective landscaping.</p> <p>Consequently, the policy as worded is considered to be sound and therefore it is not necessary to make the changes suggested as it is covered by the NPPF. However, the GNLP authorities would not object to the proposed modification being put forward by the Inspector to include reference to ‘species should be appropriate to the local area’.</p>	<p>Amend site policy as requested by HE</p> <p>2. ‘Landscaping, <u>including species appropriate to the local area</u> will be provided to enhance screening and to maintain the residential amenity of adjoining properties’.</p>	

Site	Sound/Unsound	Comments	Councils Response	Potential change to plan	Historic England response
GNLP5005 Strayground Lane, Wymondham Recycling Centre	Sound	No comments	Noted	No change	
GNLP5009 Hockering Lane, Bawburgh	Unsound	<p>Whilst there are no designated heritage assets within the site, the Bawburgh Conservation Area lies to the west of the site but is separated by a block of development. There are listed buildings and scheduled monuments to the north west of the site across the valley. The development has the potential to impact the significance of these heritage assets via a change in their settings.</p> <p>The Site assessment suggests the preparation of a Heritage Impact Assessment. The Sustainability Appraisal identifies negative impact.</p> <p>Given this is one of the more sensitive sites in heritage terms, an HIA should be prepared now to inform the suitability of the site per se and the policy wording. <i>We recommend an HIA is</i></p>	<p>Significant opposition was expressed to site <b>GNLP5009</b> through the public consultation from nearby residents. Amongst other issues, the highway implications to Hockering Lane were raised as a particular area of concern. Following the public consultation, the landowner has decided to withdraw the site from the local plan process, meaning that it is no longer an achievable allocation.</p>	<p>Omit site <b>GNLP5009</b> from the Site Allocations Policies contained in G&amp;T Topic Paper (<a href="#">H3.1</a>) as it is no longer available.</p>	<b>NOTED</b>

Site	Sound/ Unsound	Comments	Councils Response	Potential change to plan	Historic England response
		<p><i>prepared now prior to inform the suitability of the site and policy wording.</i></p> <p><i>Amend policy re archaeological assessment to read 'Planning applications should be supported by archaeological assessment including the results of field evaluation where appropriate.'</i></p> <p><i>And make clear if desk based or field based appropriate.</i></p> <p><i>Add criterion to read '<u>Protect and enhance the trees and hedgerows</u></i></p>			

Site Reference	Sound/ Unsound	Comments	Councils Response	Potential change to plan	Historic England response
		<p>The policy states that an archaeological assessment will be required prior to development. As with the Cawston site it would be helpful for the policy to state if the assessment should be desk based or field based. Moreover, in our view, some assessment is needed to inform any planning application. We therefore advise that the criterion should be amended to read, 'Planning applications should be supported by archaeological assessment including the results of field evaluation where appropriate.'</p> <p>The SA recommends that the policy should protect or where possible enhance the trees and hedgerow surrounding the site, which would be likely to help conserve the landscape character and historic settings of nearby heritage assets in Bawburgh by ensuring the site is appropriately screened. This should be included in the policy.  <u>surrounding the site to conserve the landscape character and historic settings of nearby heritage assets</u></p>			

		<i>in Bawburgh by ensuring the site is appropriately screened'.</i>			
GNLP5014 A47 North Burlingham Junction	Sound	We welcome bullet point 3 in relation to landscaping to protect views of non-designated heritage assets nearby.	Comment noted, significant opposition was expressed to site <b>GNLP5014</b> through the public consultation. Significantly, National Highways responded to the consultation stating that all the land identified as a potential broad location for a Gypsy and Traveller accommodation is now required for landscaping and drainage improvements associated to the Blofield to North Burlingham A47 road improvement scheme. The site has therefore been withdrawn from the local plan process.	Omit site <b>GNLP5014</b> from the Site Allocations Policies contained in G&T Topic Paper ( <a href="#">H3.1</a> ) as the site is no longer available.	<b>NOTED</b>



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GNLP5019 Woodland Stable, Shortthorn Road, Stratton Strawless	Sound	No comments	Noted	No Change	
GNLP5020 Romany Meadow, The Turnpike, Carleton Rode	Sound	<p>Whilst there are no designated heritage assets within the site, there are several grade II listed buildings nearby including The Ashes to the east and a cluster of grade II properties to the northwest.</p> <p>However, the site is quite well contained and intervening landscaping should limit the impact on the historic environment.</p> <p>We welcome bullet point 4 in relation to landscaping to protect views of nearby listed buildings.</p>	Comment noted	No Change	
GNLP5021 The Old Produce Shop, Holt Road, Horsford	Sound	No comments	<p>Some opposition was expressed to site GNLP5021 through the public consultation. Following the consultation, the landowner has reconsidered the site's promotion and has decided to withdraw it from the local plan process, meaning that it is no longer an</p>	Omit site GNLP5021 from the GNLP as it is no longer available as shown in G&T Topic Paper ( <a href="#">H3.1</a> )	<b>NOTED</b>

			achievable allocation. The landowner's decision was partly based on comments posted on social media		
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Site	Sound/ Unsound	Summary of Comments	Councils Response	Potential change to plan	Historic England response
GNLP5022 The Oaks, Foulsham	Sound	<p>This is an extension of an existing site. Whilst there are no designated heritage assets within the site, the grade II* church of St Andrew lies to the south east of the site. There are three grade II listed buildings close by including Manor Farm House to the west, Old Hall to the East and Old Hall Farmhouse to the north east of the site. However, the site is well screened and there is intervening off- site vegetation. Therefore, we consider any impact on designated heritage assets would be minimal.</p> <p>We welcome bullet point 4 in relation to landscaping to protect views of nearby listed buildings.</p>	Comment noted	No Change	
GNLP5023 Strayground Lane, Wymondham	Unsound	<p>The SA states that the policy could be further improved by detailed requirements to consider landscaping measures to reduce potential for adverse effects on the surrounding landscape character.</p> <p><i>Add policy criterion to read '<u>Landscaping measures to reduce potential for adverse effects on the</u></i></p>	<p>Comment noted – the site has been referenced GNLP5028 to include former GNLP5005. The policy requirement has been amended as per HE comments as:</p> <p>'5. <u>Landscape</u></p>	No change	<b>AGREED</b>

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		<i>surrounding landscape character'</i>	screening will be required <u>at the site boundaries</u> to the <del>neighbouring paving company</del> protect residential amenity and landscape character'. This amendment is contained in Topic Paper: Addendum on G&T Sites ( <a href="#">H3.1</a> )		
GNLP5024 Upgate Street, Carleton Rode	Unsound	<p>Whilst there are no designated heritage assets within the site, there are two grade II listed buildings to the north of the site and the New Buckenham Conservation Area to the west of the site. The site assessment states that Bunns Bank Linear Earthwork, which elsewhere in its course is scheduled, is adjacent to the site and should be taken into consideration. This requirement should be included in the policy wording of the Plan. We suggest an additional bullet point to the policy criteria.</p> <p><i>Amend policy wording to add bullet point to read:</i></p> <p><i><u>'Protect the adjacent Bunns Bank Linear Earthwork.'</u></i></p>	<p>Comment noted, the site is approximately 230 metres away from entry 57351 possible fragment of Bunns Bank linear earthwork. Therefore, if the Inspector is minded to include a reference in the supporting text as: '5. A possible fragment of the scheduled monument Bunn's Bank is approximately 230 metres from the site. therefore, an archaeological assessment is required prior to development.'</p>	<p>Amend Topic Paper: Addendum on G&amp;T Sites (<a href="#">H3.1</a>) Site GNLP5024 and include a reference in the supporting text as: '5. A possible fragment of the scheduled monument Bunn's Bank is approximately 230 metres from the site. therefore, an archaeological assessment is required prior to development.'</p> <p>Also add a policy requirement 'To 'protect the Bunns Bank Linear Earthwork an archaeological</p>	<p><b>AGREED.</b> Proposed modification provides greater protection for historic environment ensuring the policy is effective and consistent with the NPPF/</p>

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		<p>However, overall the site is well screened and there is intervening off-site vegetation. Therefore, we consider any impact on designated heritage would be minimal.</p>	<p>Also add a policy requirement 'To 'protect the Bunns Bank Linear Earthwork an archaeological assessment will be required prior to development' as main modifications per HE comments, the Partnership would not object.</p>	<p>assessment will be required prior to development' through as main modifications per HE comments</p>	
<p>Reasonable Alternative Site Policy GNLP5013 Ketteringham Depot land west of Station Lane, Ketteringham</p>	<p>Sound</p>	<p>Whilst there are no designated heritage assets within the site boundary, there are two round barrows (scheduled monuments) to the south of the site and several grade II listed buildings nearby. However, these are all over 500 metres from the site. Given the distance and intervening vegetation, we consider there would be little impact on designated heritage.</p>	<p>Comment noted</p>	<p>No change</p>	

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**Table 2 – Summary of Historic England representations and responses – G&T Site Allocations- Additional Consultation (June-July 2023)**

Site	Sound/Unsound	Comments	Councils Response	Potential change to plan	Historic England response
GNLP5027 Brick Kiln Road, Hevingham	Sound	We note that this is a 'favoured site/reasonable alternative'.  There are no designated heritage assets within the site boundary or nearby. No comments.	Comment noted the site is recommended for allocation.	No change	
GNLP5025 Woodyard, Reepham Road, Foulsham	Unsound	We note that this site is an 'Unreasonable Alternative Site' and is not currently proposed for allocation.  Whilst there are no designated heritage assets within the site boundary, there are a number of designated heritage assets nearby including Old Hall Farm Boundary Wall (grade II listed), Old Hall Farm house (Grade II*) and Manor Farm House (grade II) as well as the Foulsham Conservation Area approximately 200 metres to the west (not 1km as the Site Assessment suggests). The development has the potential to impact the significance of these heritage assets via a change in their settings.	Comment noted the site is not proposed to be allocated and thus expand existing site. This point has been checked Include an errata to the Site Assessment to state a factual correction as per HE Comment clarifying that the Conservation Area is approx. 200 metres to the west and therefore, the development has the potential to impact the significance of these heritage assets via a change in their settings.	Include an errata to the Site Assessment to state a factual correction as per HE comment clarifying that the Conservation Area is approx. 200 metres to the west and therefore, the development has the potential to impact the significance of these heritage assets via a change in their settings. Consequently, a HIA would be required to inform the suitability of the site if the site was considered further.	<b>AGREED,</b> welcome factual correction

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Site	Sound/Unsound	Comments	Councils Response	Potential change to plan	Historic England response
		<p>Before any further consideration for potential allocation we would expect a Heritage Impact Assessment to more fully consider the likely impacts on heritage, the site's suitability and any mitigation required.</p> <p><i>If further consideration for potential allocation, then we would recommend an HIA is prepared to inform the suitability of the site and policy wording.</i></p> <p><i>Amend distance to CA in SA</i></p>	<p>Consequently, a HIA would be required to inform the suitability of the site if the site was considered further.</p>		
GNLP5026 Peddlars Turnpike, Guestwick	Unsound	<p>We note that this site is an 'Unreasonable Alternative Site' and is not currently proposed for allocation.</p> <p>Whilst there are no designated heritage assets within the site boundary, there are a number of designated heritage assets nearby including Old Hall Farmhouse to the south and Station Farmhouse to the north (both grade II). The development has the potential to impact the significance of these heritage assets via a change in their settings. However, the site is</p>	<p>Comment noted the site is not proposed to be allocated.</p> <p>Correct typo 0.5 km radius instead of 5 km radius in errata to the Site Assessment</p>	<p>Correct typo 0.5 km radius instead of 5 km radius in errata to the Site Assessment</p>	<p><b>AGREED,</b> welcome factual correction</p>

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Site	Sound/Unsound	Comments	Councils Response	Potential change to plan	Historic England response
		<p>quite well contained and intervening landscaping should limit the impact on the historic environment.</p> <p>The site assessment refers to a 5km radius- is that correct? Should it read 0.5km?</p> <p><i>Amend radius in SA if necessary.</i></p>			