

Appendix B: Table of Historic England’s comments on the proposed Allocations in the Draft of the Greater Norwich Local Plan

[Historic England’s comments on the remainder of the Local Plan are set out in Appendix A]

Site Ref.	Location	Sound/ Unsound/ Comment	Comments	Suggested Change
	General comment on site assessment booklets for site allocations and lack of Heritage Impact Assessments	Unsound	<p>At the regulation 18 consultation and in subsequent discussions with the Council, we have made it clear that we did not consider there to be sufficient evidence in relation to the historic environment to support the site allocations.</p> <p>We understand that the HEELA and some site assessments have been revisited during the last year.</p> <p>However, we have reviewed a number of the assessments, both in the HEELA and also the site assessment booklets. Whilst we see that some of the HEELA and site assessments have been revisited, we still find the assessments lacking.</p> <p>Unfortunately, the assessments do not follow the five step methodology for site allocations set out in our Advice note 3 on site allocations. https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/ 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.</p> <p>This is particularly concerning for the sites where we suggested that more detailed Heritage Impact Assessment (HIA) was required (and indeed, we had understood that it was the Council's intention to undertake this work when we met with them last year).</p>	<i>Prepare HIAs for particular sites identified below prior to EIP.</i>

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			<p>In our view, the key sites requiring HIA are: GNLP0409R, GNLP3053 GNLP3054, GNLP 0506, GNLP0125, GNLP2143, GNLP2019 and GNLP0133B and D.</p> <p>The Plan now includes a number of new sites and we would also recommend an HIA for the following new sites GNLP0596R , GNLP 0253 and GNLP0581/2043.</p> <p>We appreciate that there were various reasons why the Councils did not undertake this work prior to consultation on the Regulation 19 Plan.</p> <p>However, 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>The HIAs should assess the suitability (or otherwise) of each area for development and the impact on the historic environment. The HIA should consider the issue of the capacity of the site including issues in relation to height and the impact on the historic environment.</p> <p>Should the HIA conclude that development in the area could be acceptable and the site be allocated, the findings of the HIA should inform the Local Plan policy including development criteria and ideally a strategy diagram which expresses the development criteria in diagrammatic form.</p> <p>We would remind you that paragraph 32 of the NPPF makes it clear that significant adverse impacts should be avoided wherever</p>	

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			possible and alternative options pursued. Only where these impacts are unavoidable should suitable mitigation measures be proposed.	
	General comment on Capacity of site allocations		<p>In our comments we have raised concerns about the indicative capacity of a number of sites.</p> <p>Whilst we consider that it will be possible to achieve high densities on brown field sites compared with the densities of many parts of the city, it would not be appropriate to seek the densities associated with very tall buildings in metropolitan areas.</p> <p>We appreciate the emphasis in national policy on high density development in sustainable locations but highlight paragraph 11b and footnote 6 of the NPPF which states that there may be circumstances where the application of policies in the framework that protect areas or assets of particular importance (including designated heritage assets) provides a strong reason for restricting the overall scale, type or distribution of development in the plan area.</p> <p>Historic England consider that Norwich's historic character is under pressure from recent developments and also the scale of growth envisaged by this Plan.</p> <p>One of the first questions any Inspector will ask at EiP concerns the capacity of the sites to accommodate the level of development indicated in the Plan.</p> <p>To that end 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 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</p>	<i>Prepare an evidence document on site capacities in advance of the EiP.</i>

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			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).	
P5-10	East Norwich	Support	We welcome the references in the supporting text to heritage at paragraphs 2.8, 2.10(vii), 2.13, 2.18-2.21.	
GNLP 0360/30 53/R10	East Norwich Strategic Regeneration Area incl. Deal Ground, Carrow Works, Utilities site and land in front of ATB Lawrence Scott	Unsound	<p>The Deal Ground includes a grade II listed bottle kiln and the southern portion of the site lies within the Trowse Millgate Conservation Area.</p> <p>The Carrow Works site lies within the Bracondale Conservation Area. The site includes the Scheduled Monument, Carrow Priory and grade I listed Carrow Abbey, as well as several grade II listed buildings including Carrow House and several Carrow Works buildings. There are also a number of grade II buildings nearby on the opposite side of Bracondale.</p> <p>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. Further comments on this are given at Appendix A of our comments. 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>We 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 inform the masterplan required under policy 7.1. Will the masterplan be adopted as SPD?</p> <p>We are pleased to see that this policy now includes reference to heritage assets at criterion 6.</p>	<p><i>We continue to strongly advise that an HIA is prepared for the area now ahead of the EiP. This should also be used to inform the site capacity, the policy wording and the development of the masterplan for the Area.</i></p> <p><i>Criterion 6</i> <i>Reorder the sentences, moving the first sentence to the penultimate sentence.</i></p> <p><i>Amend wording in third sentence to read 'conserve or where opportunities arise enhance the character or appearance of the conservation areas'</i></p> <p>Deal Ground <i>In criterion 3, replace 'repair and reuse with be encouraged' with 'repair will be required together with a future maintenance scheme for the asset'.</i></p> <p>Carrow Works <i>Re-frame second sentence of Carrow works bullet point 1 in a more positive manner to more closely reflect the NPPF.</i></p>

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			<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>We welcome criterion 12 in relation to archaeology.</p> <p><u>Deal Ground</u> We broadly welcome criterion 3 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> The reference to demolition of locally listed buildings in bullet point one would appear to be unhelpful and gives the wrong emphasis in relation to conservation and enhancement of heritage assets. We suggest that this second sentence is reframed in a more positive manner to more closely reflect the NPPF. There are a number of unlisted former Colman's industrial buildings on site that are of some historic interest. The potential to retain and adapt these buildings should be identified at para 2.10 vii on page 8.</p> <p>We are particularly concerned about this site, given the heritage assets within this site.</p> <p><u>Utilities Site</u> We welcome bullet point one which acknowledges the heritage significance of the site.</p> <p><u>ATB Lawrence Scott</u> It is not entirely clear where the ATB site is and there is no separate subheading for this area of the site. Is this a new site?</p>	<p><i>Add subheading for ATB site</i></p> <p><i>Add ref at para 2.10 vii to unlisted Colman's industrial buildings of historic interest and the potential retain and adapt these.</i></p>
GNLP00 68	Land adj. to the River Wensum	Unsound	We welcome the changes to policy and the addition of criterion 3 in relation to heritage assets.	<i>Include reference to the Area of Main Archaeological Interest into the</i>

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	and the Premier Inn, Duke Street		The policy would be further improved by including reference to the Area of Main Archaeological Interest into the policy.	<i>policy.</i>
GNLP01 33 - BR	UEA – Land adjoining the Enterprise Centre, Earlham Hall	Unsound	We very much welcome the wording at criterion 2 in relation to heritage. 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.	<i>Continue to suggest HIA for campus as a whole now ahead of the EIP.</i>
GNLP01 33-C	Land at Cow Drive (the Blackdale Building adjoining Hickling House)	-	No comments	
GNLP01 33-D	Land between Suffolk Walk and Bluebell Road	Unsound	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. 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.	<i>We suggest replacing respect with 'conserve and enhance the heritage significance. We also suggest inserting a comma after Terraces.</i> <i>Continue to suggest HIA for campus now ahead of EIP.</i>
GNLP01 33	UEA Land at the Grounds Depot site – student accommodation (400 student beds)	-	Welcome criterion 2 in relation to heritage assets.	
Policy GNLP02 82	Land at Constitution Motors	Sound	Welcome bullet point 1 and reference to locally listed building.	
Policy GNLP04 01	Former Eastern Electricity Headquarters,	Sound	We welcome the new wording in criterion 2 in relation to heritage assets.	.

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	(Dukes Street)			
Policy GNLP04 09AR	Land at Barrack Street, Whitefriars	Unsound	<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>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><i>Criterion 2</i> <i>Reorder the sentences, moving the first sentence to the penultimate sentence</i></p> <p><i>Criterion 3 Change to ‘character or appearance’</i></p> <p><i>Include reference to the Area of Main Archaeological Interest into the policy</i></p> <p><i>Prepare HIA for site now ahead of EiP</i></p>
Policy GNLP04 09BR	Land at Barrack Street, Whitefriars	Unsound	<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>Amend criterion 2 to include ‘conserve and enhance the significance of heritage assets (including any contribution made to that significance by setting)’</p> <p>Prepare HIA for site now ahead of EiP</p>
Policy GNLP04 51	Land adjoining Sentinel House (St Catherine’s Yard) Surrey Street Norwich	Unsound	<p>We broadly welcome the revised wording in relation to heritage at criterion 1.</p> <p>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><i>Criterion 1</i> <i>add the words ‘the significance’ after ‘enhances’.</i></p> <p><i>Include reference to the Area of Main Archaeological Interest into the policy.</i></p>
Policy GNLP05 06	Land at and adjoining Anglia Square	Unsound	<p>We continue to have significant concerns about this allocation – in particular the scale of the allocation and potential to cause harm to the historic environment.</p>	<p><i>Prepare an HIA prior to EiP to inform the site capacity (residential and other uses), potential mitigation and enhancement and policy wording.</i></p>

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			<p>Site capacity – dwellings We note that the capacity of the site has been reduced to 800 dwellings in response to the Secretary of State’s decision in relation to this site.</p> <p>We have previously commented that the capacity of the planning 2018 application site would be closer to 600 dwellings. This was, in part, based on the work undertaken by Ash Sakula https://www.ashsak.com/projects/anglia-square-norwich that put forward a worked illustration of how Anglia Square could be redeveloped so as to provide the facilities required, within a new community in a sustainable manner that conserves and enhances the historic environment and restores the former street pattern of the area.</p> <p>We therefore continue to advise that in our view 600 dwellings should be the maximum for the site.</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. This could in part draw on some of the work done by Ash Sakula, but needs to look more broadly at the impact of potential development as expressed in the allocation (rather than simply the previous application) upon the significance of heritage assets, consider the capacity of the site including issues of height. 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 and 9 Car parking – owing to its central location, car parking should be kept to a minimum on the site. We welcome the reference to low car or car free residential development but remain concerned about the reference to decked parking for the retail element. In our view,</p>	<p><i>Amend site capacity to 600 dwellings as a maximum.</i></p> <p><i>Criterion 5</i> Delete criterion 5 in relation to car parking for the district centre.</p> <p><i>Criterion 6</i> Add the following sentence to the criterion: ‘Any landmark building should not achieve this status through height exceeding that of existing buildings that from the immediate context of the site.’</p> <p><i>Criterion 7</i> Add the words ‘including those’ before ‘at Magdalen Street’. Add sentence to read, ‘The density of development to reflect the wider character and grain of the area.’</p> <p><i>Criterion 11</i> Add sentence to read ‘Reinstatement of historic street pattern.’</p> <p><i>Include reference to the Area of Main Archaeological Interest into the policy.</i></p>

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			<p>car parking should be reduced on the site, making the most of this sustainable location.</p> <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.</p> <p>The criterion should also require a density of development to reflect the character and grain of the area.</p> <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>	
GNLP10 61R	Land known as Site 4, Norwich Airport	Unsound	<p>This would appear to be a new site.</p> <p>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 airport site has the potential to impact upon these heritage assets.</p>	<p><i>Add criterion 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</i></p>

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			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).	<i>contribution made to tier significance by setting).</i>
Policy GNL21 14	Land at and adjoining St Georges Works, Muspole Street	Sound	We welcome the changes made to the policy wording to include specific reference to heritage assets.	
Policy GNL21 63	Friars Quay Car Park, Colegate	Sound	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.	
GNL21 2164	Land west of Eastgate House, Thorpe Road	Sound	We welcome the reference to the Conservation Area in this policy.	
GNL21 3054	St Marys Works and St Marys House (150 dwellings and hotel)	Unsound	<p>Again we suggest a more detailed HIA is prepared for this site.</p> <p>The supporting text at paragraphs 2.93 - 2.98 provide helpful context in relation to heritage and the site.</p> <p>We note that reference is made to a heritage statement and heritage impact assessment in paragraph 2.95. However, we continue to suggest that the HIA should be prepared ahead of the EiP to inform the allocation.</p> <p>Criterion 1 Should read character or appearance in line with legislation</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.</p>	<p><i>Prepare HIA for site now ahead of EiP</i></p> <p><i>Criterion 1 Should read character or appearance in line with legislation.</i></p> <p><i>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 – setting can be part of significance. The sentence would be better is it read ‘conserve and enhance significance of the</i></p>

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			<p>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 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>We welcome criteria 3,4 and 6</p> <p>Criterion 5 Character <u>or</u> appearance rather than <u>and</u> to reflect the legislation</p> <p>The policy would be further improved by including reference to the Area of Main Archaeological Interest into the policy.</p>	<p><i>designated and non-designated heritage assets both on-site and off-site (including any contribution made to that significance by setting).</i></p> <p><i>Criterion 5 Character <u>or</u> appearance rather than <u>and</u></i></p> <p><i>Include reference to the Area of Main Archaeological Interest into the policy.</i></p>
POLICY CC2	147 – 153 Ber Street, Norwich	Unsound	<p>We welcome criterion 2 that references the Conservation Area and listed buildings. It would be helpful to specifically identify some of the key listed buildings including the Grade I listed Church of St John de Sepulchre and other nearby grade II listed buildings.</p> <p>The policy would be further improved by including reference to the Area of Main Archaeological Interest into the policy.</p>	<p><i>Include reference to the Area of Main Archaeological Interest into the policy.</i></p>
POLICY CC3	10 – 14 Ber Street	Sound	<p>We welcome the changes made to this policy to include criteria 2, 3 and 7 which reference heritage assets and archaeology.</p>	
POLICY CC4a	Land at Rose Lane/ Mountergate	Sound	<p>We welcome the changes made to this policy at criterion 4 to reference adjacent heritage assets.</p>	
POLICY CC4b	Land Mountergate/ Prince of Wales Road	Sound	<p>We welcome criteria 3, 4 and 5 of this policy 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.</p>	
POLICY CC7	Hobrough Lane, King Street	Unsound	<p>We welcome bullet point 2 that relates to sensitive conversion of historic buildings, bullet point 3 which refers to the Conservation</p>	<p><i>Include criterion in relation to archaeological assessment in policy.</i></p>

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			Area and listed buildings and bullet point 6 in relation to heritage interpretation. The supporting text mentions that archaeological assessment will be required. This requirement should also be included in the policy.	
POLICY CC8	King Street Stores	Unsound	We welcome criteria 1, 2 and 4 of the policy which relate to historic street frontage, the Conservation Area and listed buildings, scale and form of development and locally listed structures. The supporting text mentions that trial trenching will be required prior to development. This requirement should also be included in the policy.	<i>Include criterion in relation to trial trenching in policy.</i>
POLICY CC10	Land at Garden Street and Rouen Road	Unsound	We 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). We welcome criterion 4 in relation to archaeology.	<i>Delete criterion 2.</i>
POLICY CC11	Land at Argyle Street	Unsound	We welcome the addition of criterion 1 that specifically mentions the conservation area and listed buildings. The supporting text mentions that archaeological investigation will be required. This requirement should also be included in the policy.	<i>Include criterion in relation to archaeological investigation in policy.</i>
POLICY CC13	Land at Lower Clarence Road	Sound	We welcome the inclusion of criteria 1 and 2 in relation to scale and massing and also impact on nearby conservation areas.	
POLICY CC15	Norwich Mail Centre, 13-17 Thorpe Road	Unsound	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 Throe Road). The nearby station is also grade II listed. We welcome mention of the conservation area in the policy at criterion 1. The policy should also mention the listed buildings.	<i>Include reference to the listed buildings in the policy and supporting text.</i>
POLICY CC16	Land adjoining Norwich City	Sound	We welcome the changes to this policy to include criterion 2 that specifically references the Bracondale Conservation Area and	

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	Football Club north and east of Geoffrey Watling Way		nearby listed buildings including Carrow Priory and Boom Towers.	
POLICY CC18 (CC19)	Land at 140-154 Oak Street and 70-72 Sussex Street	Unsound	We welcome the changes to criterion 1 to include specific reference to the grade II listed Great Hall. The policy would be further improved by including reference to the Area of Main Archaeological Interest into the policy.	<i>Include criterion in relation to archaeological assessment in policy.</i>
POLICY CC24	Land to rear of City Hall	Unsound	We welcome criteria 1, 2 and 4 and in particular welcome the reference to height in criterion 2. The policy would be further improved by including reference to the Area of Main Archaeological Interest into the policy.	<i>Include criterion in relation to archaeological assessment in policy.</i>
POLICY CC30	Westwick Street Car Park	Unsound	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. The supporting text mentions that archaeological investigation will be required. This requirement should also be included in the policy.	<i>Include criterion in relation to archaeological assessment in policy.</i>
Policy R1	Land at The Neatmarket, Hall Road	-	No comments	
POLICY R2	Ipswich Road Community Hub, 120 Ipswich Road,	-	No comments	
POLICY R7	John Youngs Limited, 24 City Road	Sound	We welcome reference in bullet point 2 of the policy to the church and the locally listed residential terraces.	
POLICY	Site of former	Unsound	We welcome the inclusion of bullet point 2 in the policy but	<i>Reference should also be made to</i>

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R13	Gas Holder at Gas Hill		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.	<i>the City Centre Conservation Area and the nearby grade II listed buildings, Bridge House PH and Chalk Hill House.</i>
Policy R14/15	Land at Kett's Hill and east of Bishop Bridge Road	Sound	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.	
POLICY R17	Site of former Van Dal Shoes, Dibden Road,	Sound	We welcome the reference to the locally listed shoe factory building in the policy.	
POLICY R18	Site of former Start Rite Factory, 28 Mousehold Lane	-	No comments	
POLICY R19	Land north of Windmill Road	-	No comments	
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.	
POLICY R29	Two sites at Hurricane Way, Airport Industrial Estate	-	No comments	
Policy R30	Land at Holt Road	-	No comments	
POLICY R31	Heigham Water Treatment Works, Waterworks Road	Sound	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.	
POLICY R33	Site of former Earl of Leicester Public House, 238 Dereham	Sound	We welcome reference to Earlham Cemetery in criterion 1 and to heritage interpretation at criterion 5.	

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	Road			
POLICY R35	Land at Havers Road,	-	No comments	
POLICY R36	Mile Cross Depot	Sound	We welcome bullet point 1 of the policy that references the Conservation Area.	
Policy R37	The Norwich Community Hospital site, Bowthorpe Road,	Sound	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.	
POLICY R38	Three Score, Bowthorpe	Sound	We welcome reference to the Conservation Area and Bowthorpe Hall within bullet point 4 of the policy.	
POLICY R42	Land west of Bluebell Road, and north of Daisy Hill Court/Coral Court, Westfield View	Sound	We welcome the reference to the Eaton Conservation Area in bullet point 1.	

Policy GNLP21 59	Land at 84-120 Ber Street and Mariners Lane Car Park (mixed use incl 150 dwellings)	Comment	This site was in the Reg 18 Plan but doesn't seem to be in the Reg 19 Plan. Has the site been deleted?	
	COLNEY			
COL1	Land adj to Norwich Research Park	Sound	We welcome the addition of criterion 16 and 19 in relation to heritage assets and archaeology.	
GNLP 0331CR	South of Norwich Research Park extension, Colney	-	No comments	
COL2 GNLP 0140C	Colney Strategic Employment Area	Sound	We welcome the addition of criterion 1 in relation to heritage assets	
COL3		-	No comments	
GNLP 0253	Colney Hall, Watton Road, Colney	Unsound	<p>Colney Hall is located at the heart of this allocation. Colney Hall 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.</p> <p>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.</p> <p>Given the scale of this development and the fact that development would surround the listed building, we suggest that an HIA is prepared to assess the suitability of the site and to inform any policy wording.</p>	<i>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.</i>
BAW 2	Bawburgh and Colney Lakes	Sound	We welcome criterion 2 regarding the conservation management plan.	
	COSTESSEY		See section 8 on contingency site.	
COS3/ GNLPS L	Longwater Employment area	-	No comments	

2008				
COS4	Redevelopment of existing uses within the Costessy Longwater Development Boundary	-	No comments	
COS 5	Royal Norfolk Showground	-	No comments	
	CRINGLEFORD			
HOU1	Land north and south of the A11	Sound	No comments	
KES 2	Land west of Ipswich Road	Sound	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.	
	DRAYTON			
DRA1	Land east of Cator Road	Sound	We welcome 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.	Format with numbered bullets.
	EASTON AND HONINGHAM			
EAS1	Land south and east of Easton	Sound	Welcome criteria 8 and 9 and particularly the changes to 9 to make specific reference to St Peters Church.	
	HELLESDON			
HEL 1	Land at Hospital grounds	Sound	Welcome bullet point 4	
HEL2	Land at Royal Norwich Golf Club	-	No comments	
HEL3 GNLP 1020	Extension to burial ground	-	No comments	
HEL4 GNLP 1019	Recreational Open Space	-	No comments	
	RACKHEATH			
Policy	Land to the west	Sound	We welcome the changes to criterion 6 to make it absolutely clear	

GNLP01 72	of Green Lane West		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.	
Policy GNLP03 51	Land at Heathwood Gospel Hall, Green Lane West	-	No comments	
	SPROWSTON			
Policy GNLP01 32	Land off Blue Bar Lane/Salhouse Road, White House Farm	Sound	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 protection of trees in bullet point 6.	
	TAVERHAM			
GNLP03 37R	Land between Fir Covert Road and Reepham Road	-	No comments	
GNLP01 59R	Land off Beach Avenue, Taverham	-	No comments	
	THORPE ST ANDREW	-	No comments	
	TROWSE			
TROW1		Sound	We welcome the changes made to this policy to include specific reference to the Trowse Conservation Area.	
	AYLSHAM			
AYL3		-	No comments	
AYL4		-	No comments	
Policy GNLP03 11, 0595 and 2060	Land south of Burgh Road and west of the A140	Sound	We welcome the change at bullet point 8 to specifically reference Bure Valley Farmhouse.	
GNLP 0596R	Land at Norwich Road	Unsound	This is a new site. Diggens Farmhouse, listed at grade II, lies to the east of the site. We welcome criterion 8 that specifically references	<i>Include a requirement for open space and landscaping at the eastern end</i>

			<p>the asset but suggest that mention should also be made of the need to include open space and landscaping at the eastern end of the site to protect the significance of the asset.</p> <p>Given the proximity of the Farmhouse we suggest that a more detailed Heritage Impact Assessment be undertaken to assess the impact of the proposed development upon the significance of this heritage asset, to establish the suitability or otherwise of the site and to establish appropriate mitigation and enhancement should the site be found suitable. This HIA should be completed in advance of the EIP. If the site is found suitable, the findings of the HIA should then inform the policy wording.</p>	<p><i>of the site.</i></p> <p><i>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.</i></p>
	DISS			
GNLP01 02	Land at Frontier Agriculture Ltd, Sandy Lane	-	No comments	
Policy GNLP21 08	Land south of Spirketts Lane		We welcome the changes to criterion 4 to reference the listed buildings	
Policy GNLP 2136	Land at Briar Farm	-	No comments	
Policy HAR 4	Land at Spirketts Lane	-	No comments	
Policy HAR5	Land off Station Hill	Sound	We welcome the reference to archaeology at criterion 8.	
Policy HAR 6	Land north of Spirketts Lane	-	No comments	
Policy HAR7	Land south of Spirketts Lane	-	No comments	
	HETHEL SEA			
GNLP 2019	South of Hethel Industrial	Unsound	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	<i>We continue to suggest a detailed HIA is undertaken for this site prior to</i>

check	Estate, Bracon Ash		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.	<i>EiP to assess the suitability or otherwise of the site and consider any appropriate mitigation.</i>
Policy HETHE L 1		-	No comments	
Policy HETHE L 2	Land south and south west of Lotus Cars, Hethel	Unsound	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. 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 landscaping along the eastern edge of the site.	<i>We continue to 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 landscaping along the eastern edge of the site.</i>
	LONG STRATTON	-	No comments	
	WYMONDHAM			
GNLP03 54R	Land at Johnson's Farm	Comment	We welcome bullet point 4 relating to listed buildings and the Conservation Area.	
Policy GNLP30 13	Land north of Tuttle Lane	-	No comments	
	ACLE			
GNLP 0378 Policy GNLP 2139	Land west of Acle/North of Norwich Road	-	No comments	
Policy ACL1	Land to the north of Norwich Road	-	No comments	

Policy ACL 2	Land to the south of Acle station	-	No comments	
Policy ACL 3	Land at the former station yard	-	No comments	
	BLOFIELD			
GNLP 2161	Norwich Camping and Leisure	-	No comments	
Policy BL01	Land to the south of the A47 and north of Yarmouth Road	Sound	We welcome the addition of criterion 2 that references the grade II listed Manor Farm Barn to the south of the site.	
	BRUNDALL			
Policy BRU2	Land north of Berryfields, Brundall – open space	-	No comments	
Policy BRU2	Land east of the Memorial Hall, Brundall – open space	-	No comments	
	HETHERSETT			
Policy HET1	Land north of Hethersett	Sound	We welcome the reference to archaeology at criterion 18.	
Policy HET2	Land north of Grove Road	-	No comments	
Policy HET3	Land west of Poppyfields – open space	-	No comments	
	HINGHAM			

GNLP05 03	Land north of Springfield Way and West of Dereham Road	-	No comments	
GNLP05 20	Land south of Norwich Road	Sound	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.	
Policy HIN2	Land adjacent to Hingham Industrial Estate	Sound	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.	
	LODDON AND CHEDGRAVE			
GNLP03 12	Land to the east of Beccles Road	Sound	We welcome the addition of criterion 3 to reference the listed buildings and conservation area.	
GNLP04 63	Land off Langley Road, Chedgrave	Sound	We welcome the addition of criterion 2 to reference the listed buildings and Langley Park registered park and garden.	
Policy LOD3	Land adjacent to Loddon Industrial Estate, Little Money Road	-	No comments	
	PORINGLAND, FRAMINGHAM EARL AND FRAMINGHAM PIGOT			
POLICY POR3	Ex MOD site, pine like	-	No comments	
	REEPHAM			
REP 1	Land off Broomhill Lane	-	No comments	
REP2	Land at former station yard, Station Road	-	No comments	

	WROXHAM	-	No comments	
	VILLAGE CLUSTERS BROAD-LAND			
	BLOFIELD HEATH AND HEMBLINGTON			
GNLP10 48	Land to the East of Woodbastwick Road	-	No comments	
Policy BLO5	Land to the north of Blofield Corner	-	No comments	
	BUXTON WITH LAMAS AND BRAMPTON			
GNLP02 97	Land east of Aylsham Road	-	No comments	
Policy BUX1	Land east of Lion Road	-	No comments	
	CANTLEY	-	No comments	
	CAWSTON, BRANDISTON AND SWANNINGTON			
GNLP02 93	Land East of Gayford Road, Cawston	-	No comments	
CAW1	Land west of existing cemetery – extension to	-	No comments	

	burial ground			
Policy CAW2	Land east of Gayford Road, Cawston	-	No comments	
	COLTISHALL, HORSTEAD WITH STANNINGHALL AND BELAUGH			
GNLP20 19	Land at Rectory Road and south of the Bure Valley Railway	-	No comments	
POLICY COL1	Land at Rectory Road,	-	No comments	
POLICY COL2	Land at Jordan's Scrapyard, Coltishall	Sound	We welcome the addition of criterion 4 to reference the nearby listed limekiln and conservation area.	
	FOULSHAM AND THEMELTHORPE			
GNLP06 05	Land west of Foundry Close,	Sound	We welcome the addition of criterion 2 to reference the nearby listed buildings and conservation area.	
POLICY FOU2	Land at Old Railway Yard, Station Road	Sound	We welcome the addition of criterion 6 to reference the nearby conservation area.	
	FREETHORPE, HALVERGATE AND WICKHAMPTON			
GNLP20	South of	-	No comments	

34	Bowlers Close			
POLICY FRE1	Land north of Palmers Lane,	Sound	We welcome the addition of criterion 4 to reference the nearby listed buildings and requirement for landscaping along the northern boundary.	
	FRETTENHAM	-	No comments	
	GREAT & LITTLE PLUMSTEAD	-	No comments	
	GREAT WITCHINGHAM , LENWADE, WESTON LONGVILLE, ALDERFORD, ATTLEBRIDGE, LITTLE WITCHINGHAM AND MORTON-ON-THE-HILL			
GNLP06 08	Land at Bridge Farm Field, St Faiths Close, Great Witchingham	Sound	We welcome the reference to the listed building at criterion 3.	
	HAINFORD AND STRATTON STRAWLESS		No comments	
	HEVINGHAM	-	No comments	
	HORSFORD, FELTHORPE AND HAVERINGLAND			
GNLP02 64	Dog Lane	-	No comments	

	HORSHAM AND NEWTON ST FAITH			
GNLP01 25	Land west of West Lane	Unsound	<p>This site lies to the east of the Horsham St Faith Conservation Area and its associated listed buildings including the Grade I listed Church of the Blessed Virgin and St Andrew as well as St Faith Priory which is a scheduled monument. Any development of the site has the potential to impact upon the setting of these heritage assets.</p> <p>This is a sensitive site in terms of the potential impact upon these multiple heritage assets, some of which are highly graded. We therefore have some concerns about the allocation of this site.</p> <p>We note and welcome the reference to the church, scheduled Priory and conservation area in bullet point 4.</p> <p>We do however continue to suggest that a more detailed Heritage Impact Assessment be undertaken 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. This HIA should be completed in advance of the EIP. If the site is found suitable, the findings of the HIA should then inform the policy wording.</p>	<p><i>We suggest that a more detailed Heritage Impact Assessment be undertaken <u>in advance of the EIP</u> 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. If the site is found suitable, the findings of the HIA should then inform the policy wording.</i></p>
POLICY HNF1	Land east of Manor Road,	Sound	We welcome the addition of criterion 6 to reference the nearby listed buildings and requirement for landscaping along the eastern boundary.	
POLICY HNF2/ GNLP04 66R	Land east of the A140 and north of Norwich International Airport	-	We welcome the reference to Archaeology at criterion 12.	
POLICY HNF3	Land at Abbey Farm Commercial, Horsham St Faith	Comment	This site is separated from Horsham St Faith and its Conservation Area and listed buildings by the existing industrial estate. Nevertheless, given the proximity of the scheduled St Faith Priory, this area is of archaeological sensitivity. To that end we welcome the reference at bullet point 3 in relation to archaeology.	

	LINGWOOD AND BURLINGHAM, STRUMPSHAW AND BEIGHTON			
POLICY GNLP03 79	Land north of Post Office Road	Sound	We welcome the deletion of this site from the Plan	
GNLP 0380	West of Blofield Road	-	No comments	
GNLP 4016	East of Station Road	-	No comments	
	MARSHAM			
GNLP21 43	Land south of Le Neve Road	Unsound	<p>Whilst there are no designated heritage assets within the site boundary, there are a number of listed buildings to the east of the site including the grade I listed Church of All Saints and the grade II listed Old Rectory, Colenso Cottage and Marsham War Memorial.</p> <p>We welcome the amended wording at criterion 3 to reference other heritage assets.</p> <p>This is a sensitive site in terms of the potential impact upon these multiple heritage assets, some of which are highly graded. We therefore have some concerns about the allocation of this site.</p> <p>We therefore continue to 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. If the site is found suitable, the findings of the HIA should then inform the policy wording.</p> <p>It might also be helpful to illustrate proposed mitigation in the form of a concept diagram for the site e.g. showing where open space and landscaping would be located in the Local Plan.</p>	<p><i>We suggest that a more detailed Heritage Impact Assessment be undertaken <u>in advance of the EiP</u> 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. If the site is found suitable, the findings of the HIA should then inform the policy wording.</i></p> <p><i>It might also be helpful to illustrate proposed mitigation in the form of a concept diagram for the site e.g. showing where open space and landscaping would be located in the Local Plan.</i></p>
	REEDHAM			

POLICY GNLP10 01	Land to East of Station Road	-	No comments	
POLICY GNLP30 03	Mill Road, Reedham	Comment	We welcome the reference to the non-designated heritage asset.	
	SALHOUSE, WOODBASTWI CK AND RANWORTH			
POLICY GNLP01 88	Land adjoining Norwich Road	-	No comments	
	SOUTH WALSHAM AND UPTON- WITH-FISHLEY			
POLICY GNLP 0382	Land north of Chamery Hall Lane	-	No comments	
POLICY SWA1	Land to the rear of Burlingham Road/St Marys Close	--	No comments	
	SPIXWORTH & CROSTWICK	-	No comments	
7	SOUTH NORFOLK VILLAGES NON- RESIDENTIAL SITES			
POLICY BKE 3	Brooke Industrial Estate, Brooke	Comment	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. We suggest that the bullet points are numbered for consistency with the rest of the Plan.	<i>Number the bullet points for consistency with rest of Plan.</i>

8	COSTESSEY CONTINGENCY SITE			
GNLP 0581/2043	Land off Bawburgh Land, north of New Road, east of the A47 (62.42ha urban extension incl. 800 homes)	Unsound	<p>Whilst there are no designated heritage assets 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. This includes the grade I listed church of St Mary and St Wulfstan, grade II* listed Church Farmhouse, The Hermit's House and the Slipper Chapel, together with a number of grade II listed buildings. There are also three scheduled monuments (Bawburgh Bridge and two garden houses near the Hall). Any development of the site has the potential to impact upon the setting of these heritage assets.</p> <p>This is a very large site for development and therefore the scale of the development may have an impact on these sites. Whilst we consider it likely that the site could accommodate development, we suggest that a Heritage Impact Assessment should 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. If the site is found suitable, the findings of the HIA should then inform the policy wording.</p> <p>It might also be helpful to illustrate proposed mitigation in the form of a concept diagram for the site e.g. showing where open space and landscaping would be located in the Local Plan.</p>	<p><i>We suggest that a more detailed Heritage Impact Assessment be undertaken <u>in advance of the EiP</u> 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. If the site is found suitable, the findings of the HIA should then inform the policy wording.</i></p> <p><i>It might also be helpful to illustrate proposed mitigation in the form of a concept diagram for the site e.g. showing where open space and landscaping would be located in the Local Plan.</i></p>