

North Norfolk District Council Local Plan examination
Statement of Common Ground

As Agreed between NNDC and Historic England
November 2023

1. The Purpose of the Statement

- 1.1 The Statement of Common Ground (SoCG) has been prepared between North Norfolk District Council (The Council) and Historic England. The purpose of the SoCG is to inform the Inspector of areas of agreement and disagreement between the two parties in relation to the submitted North Norfolk Local Plan [A1]. Such document references used in this Statement are those used in the North Norfolk Local Plan Examination document library and are indicated in square brackets. These documents can be accessed on the North Norfolk District Council Examination web site [Home | Local Plan Examination Library \(north-norfolk.gov.uk\)](https://www.norfolk.gov.uk).
- 1.2 The statement reflects the ongoing process of communication throughout Plan preparation including discussions undertaken during June and July 2023.

2. Background

- 2.1 Historic England is the public body that helps people care for, enjoy and celebrate England's spectacular historic environment. Established under section 32 of the National Heritage Act 1983 it was originally called English Heritage. Its operational name changed to Historic England on 1st April 2015. Historic England is the Government's adviser on all aspects of the historic environment.
- 2.2 The Council has consulted Historic England at each stage of the preparation of the Local Plan. In addition, there has been ongoing engagement in relation to the preparation of the Historic Environment Background Paper [EL C10 & C10.1], which details the ongoing consultation and feedback carried out in preparing the Local Plan historic environment policy ENV 7 and the format and production of Historic Impact Assessments (HIA) in relation to an agreed list of preferred and alternative sites, as part of the Local Plan process. A summary of the details of this engagement is set out in the Duty to Co-Operate [EL A8]. As a result of the dialogue, policy ENV 7 Protecting & Enhancing the Historic Environment, was updated and refined to add further clarity to the policy. All of the HIA recommendations were considered and additional details added to a number of the site allocation policies to reflect these, where appropriate.
- 2.3 The Council worked collaboratively with Historic England in preparing the HIA methodology and template, which incorporated a desktop assessment of heritage assets, a site survey, an evaluation of impact and recommended mitigation measures. The Council and Historic England agreed the sites that were assessed, and the assessment conclusions were shared with Historic England. Additional mitigation maps were produced for five sites where the potential mitigation measures were considered to be more complex.
- 2.4 Historic England formally responded to the Regulation 19 consultation and the Council has reviewed these comments, as detailed in Appendix J of the Submitted Consultation Statement Schedule 3- Summary of representations received [A5.10]. As a result, a number of proposed minor modifications as set out in Appendix 1 of this document and detailed in Appendix K Schedule 4 - Schedule of proposed additional minor modifications, [A5.11] have been submitted along with the Local Plan.
- 2.5 Notwithstanding the areas of common ground as set out above and in detail at Appendix 1, there are areas, as set out at Appendix 2 of this document, that are identified as ones that the parties are not in total agreement.

3. Statement of Common Ground Agreements

3.1 The following statements have been identified, which the parties agree are common ground.

3.2 Agreement 1 – Duty to co-operate:

The signatories agree that the Plan has been prepared in accordance with the “duty to co-operate” imposed by section 33A of the Planning and Compulsory Purchase Act 2004 in that NNDC has co-operated with Historic England through constructive and ongoing engagement in the formation of policy and supporting evidence as set out in the Duty to Cooperate Statement of Compliance [A8], and the Historic Environment Background Paper 10, which incorporates the Heritage Impact Assessments [C10 & C10.1].

3.3 Agreement 2 – Areas of Agreement taking account of proposed minor modifications

3.4 The signatories agree that the proposed modifications detailed in Appendix 1 fully or partially address the matters raised by Historic England at Regulation 19 and can be identified as areas of common ground.


3.5 Agreement 3 – Areas of Disagreement

3.6 The signatories agree that the remaining areas, as detailed in Appendix 2, in relation to Historic England’s Regulation 19 responses, but nevertheless, are areas of disagreement.

3.7 Agreement 4 -Continue work to resolve matters of disagreement through the examination process

3.8 The signatories agree to continue working towards resolving the areas of disagreement, as detailed in Appendix 2, through the examination process.

4. Signatories

North Norfolk District Council		
Name and Position	Signature	Date
Caroline Dodden, Senior Planning Officer	C.Dodden	6.11.23
Historic England		
Debbie Mack, Historic Environment Planning Adviser		3.11.23

APPENDIX 1

Areas of Agreement

Policy/ Paragraphs of Local Plan	HE comment at Regulation 19	Regulation 19 Reference number	NNDC comment / proposed modification and reference	Full or partial resolution	HE response (post Regulation 19)
2 Spatial Portrait, Vision, Aims & Objectives	Summary comment (covering LPS716-746 detailed responses). General comment - HE welcomes the emerging plan and the work undertaken to date.	LPS764	See detailed responses below relating to proposed modifications.	N/A	-
2.3 Spatial Vision, para. 3	Include reference to the historic environment in para. 3. Could also mention scheduled monuments and Registered Parks and Gardens.	LPS716	Comment noted. The Vision for Norfolk is set out in detail in 2.4 the Strategic Aims & Objectives , where the second point of Objective 2 is Protecting Character, by 'contributing to the positive management of change in the historic environment protecting, enhancing and maintaining the unique qualities and character of the District, the wider landscape and its designated and un-designated (see modification below PMIN/2.4/01) heritage assets.'	N/A	Noted
2.4 Strategic Aims & Objectives Objective 2b.	Change the word un- designated to non designated in line with the terminology used in the NPPF.	LPS717	Agree. Minor modification proposed PMIN/2.4/01 Section 2 Bullet 2 ... the wider landscape and its designated and un-designated non designated heritage assets.	Full	HE welcomes proposed modification.

1.5 The Duty to Cooperate	Should HE be mentioned here? HE would welcome the preparation of a Statement of Common Ground with HE in due course.	LPS718	The section details the Norfolk Strategic Forum which oversees the production of the Norfolk Strategic Planning Framework (NSPF) document. This sets out to demonstrate how the Local Planning Authorities and public bodies have fulfilled their legal duties around the strategic impact across local authority boundaries.	N/A	Noted. Welcome preparation of SOCG.
3. Delivering Climate resilient Sustainable Growth	HE welcomes the Plan's increased emphasis on Climate Change. We recognise the urgent need for positive action and are committed to achieving net zero. HE considers these goals to be compatible with conserving and learning from the historic environment.	LPS719	Comment noted.	N/A	-
Policy CC1 Delivering Climate Change Resilient Sustainable Growth	HE broadly welcome this policy and particularly the reference at criterion h for conserving and enhancing the historic environment and landscape character.	LPS720	Comment noted.	N/A	-
Policy CC3 Sustainable	HE broadly support the proposed policy	LPS722	Comments noted. The Council does not consider it necessary to amend the policy	N/A	Noted.

Construction, Energy Efficiency & Carbon Reduction	direction. In developing the policy HE offers further advice. The key climate change message is the need to articulate an evidence-based case for the importance of the historic environment in respect of the embodied carbon value of historic buildings and in particular the benefits of retention and reuse of old buildings, together with sustainability of traditional building materials and design.		as requested. The comment does not relate specifically to the strategic policy proposed and covers matters that are addressed through other specific policies across this Plan such as ENV8 High Quality Design and ENV7 Protecting and Enhancing the Historic Environment. No change proposed.		
Policy ENV2 Protection & Enhancement of Landscape & Settlement Character	HE welcome the reference to Conservation Areas and Registered Parks and Gardens in this policy.	LPS725	Comment noted.	N/A	-
6.7 Protecting & Enhancing the Historic Environment Paragraph 6.7.2	Change term Historic Parks and Gardens to Registered Parks and Gardens.	LPS726	Agree. Minor modification proposed PMIN/6.7/01 to update term to Registered Parks and Gardens in para. 6.7.2 'There are 81 Conservation Areas, 2265 Listed Buildings, including 94 Grade I and 202 Grade II*, 86 Scheduled Monuments and 33 Historic Registered Parks and Gardens within the District. There are also	Full	HE welcomes proposed modification.

			more than 250 buildings on the Council's Local List. '		
Policy ENV 7 Protecting & Enhancing the Historic Environment Inclusion of three requested subheadings for criteria 8, 9 and 10.	Reinstate former subheadings of Conservation Areas, Archaeology and Heritage at Risk to Policy ENV7.	LPS727	Agree. Minor modification proposed PMIN/ENV7/02 to Policy ENV 7. Conservation Areas 8. Development proposals will conserve and where opportunities arise..... Archaeology 9. Development proposals should identify assets of archaeological significance.... Heritage at Risk 10. Development proposals that bring into use or improve an asset so it is no longer deemed at risk on the Heritage at Risk Register....	Full	HE welcomes proposed modification.
Policy ENV 7 Protecting & Enhancing the Historic Environment Para. 6.7.3 and new associated footnote	Add Local List Criteria and Local List as an Appendix to the Plan.	LPS727	Agree to part minor modification PMIN/6.7/02 to amend text in Paragraph 6.7.3 and add associated footnote. 6.7.3 The number of non-designated heritage assets on the list is likely to increase over time as new buildings and other assets are identified. The Council uses Local Listing criteria as a guide to select buildings or structures for local listing in North Norfolk. ⁽⁸⁷⁾ The requirements of the policy equally apply to any local heritage assets identified and listed in adopted Neighbourhood Plans. 87. https://www.north-norfolk.gov.uk/tasks/conservation/locally-listed-buildings/	Partial	HE welcomes proposed modification.

Policy ENV8 High Quality Design	HE welcome the policy and references to local character and the historic environment. We also welcome the references to the North Norfolk Design Guide and Landscape Character Assessment.	LPS729	Comment noted.	N/A	-
Policy NW01/B: Land at Norwich Road, North Walsham	Policy NW01/B Land at Norwich Road & Nursery Drive, North Walsham should include HIA recommendations and mitigation measures.	LPS735 (PC079)	<p>Agree to proposed modifications in part, PMIN/14.1/05 (specifically proposed by NNDC PC079) to update policies relating to Heritage Impact mitigation to be fully in line with the mitigation options put forward in the HIA and Site Assessment Booklet.</p> <p>Insert new criterion (no. 6) after criterion 5 of the Policy and amend subsequent criterion number accordingly.</p> <p>6. Retain and enhance landscaping along southern, south-western and north-eastern boundaries of the site, whilst retaining and strengthening existing hedgerows within the site boundary, with particular regard to the northern boundary adjacent to Nursery Drive;</p> <p>The Conclusions of the HIA have been taken into consideration in the selection and finalisations of the preferred site allocations and policy requirements. More</p>	Partial	<p>HE welcomes the proposed modification to policy which better reflects the recommendations of the Heritage Impact Assessment.</p> <p>However, the HIA recommendation for lower density single storey development to be located at the south of the site has not been incorporated into the policy.</p> <p>Whilst recognising that the Council have chosen not to include this in their policy wording, our preference would be for this requirement to be included in the policy</p>

			information can be found in the site assessment booklets.		criteria, in line with the HIA recommendations.
Policy NW62/A: Land west of North Walsham	Policy NW62/A Land west of North Walsham should include HIA recommendations/ wording.	LPS736 (PC083)	<p>Agree in part, proposed modifications PMIN/14.3/04 & PMIN/14.3/05 (addressed by NNDC through PC083) to amend Criterion 6 and 7 of the Policy to the following:</p> <p>6. Proposals should appropriately use design, layout and landscaping to protect and enhance heritage assets and their settings, including designated and non-designated heritage assets, including the 'Bat lefield Site'. Landscape buffering and open space should be used to protect and enhance Enhancements should provide This should include a design, layout and landscaping that protects the Listed Buildings at Bradmoor Farm;</p> <p>7. retain and enhance existing hedgerows on Greens Road, and the south-eastern and western boundaries. Landscape buffers and/or green corridors will be provided along the existing urban edge of the town to protect the amenity of existing residential areas, and along Weaver's Way and the northernmost boundary. Retain existing mature trees along Skeyton Road and the eastern boundary of the site.</p> <p>The development brief for the North Walsham West extension is currently being consulted upon (September/ October 2023). The brief states on page 102 that</p>	Partial	<p>HE welcomes the proposed modification to policy which better reflects the recommendations of the Heritage Impact Assessment.</p> <p>The policy should also reference open space/sports facilities in the southern portion of the site to protect the bat lefield site as has been suggested through the masterplan.</p> <p>While we welcome the inclusion of this in the emerging draft masterplan/development brief, our preference would be for this requirement to be included in the Local Plan policy criteria, in line with the HIA recommendations.</p>

			<i>'The 'Battlefield Site' to the south of the site will be protected by the proposed southern landscape buffer. This buffer is designed to create an appropriate, rural edge for the proposals, but will also provide an element of open space protection to the 'Battlefield Site.'</i>		
Policy SH07 Former Allotments, Weybourne Road, Adjacent to The Reef, Sheringham	HE welcome criteria 1 and 2.	LPS737	Comment noted.	N/A	-
Policy ST23/2 Land north of Yarmouth Road, east of Broadbeach Gardens	Amend Criterion 7 and 9 making specific reference to Stalham Conservation Area and a number of listed buildings, and set out mitigation measures as recommended in the HIA for the western, eastern and northern boundaries of the site.	LPS739 (PC091 & PC092)	Agree to proposed modifications in part. (PC091 and PC092) and proposed modifications PMIN/16.2/03 & PMIN/16.2/04.merging and amending criterion 7 and 9 to read as follows: 7. . appropriate layout, and design, and of landscape buffering , particularly on the eastern and western boundaries of the site, should be implemented, in order to protect and enhance respect the settings of the adjacent Listed Buildings, other nearby heritage assets and the Stalham Conservation Area ; 9. provision of landscape buffering on the western boundary of the site to mitigate impacts on nearby heritage assets and the Stalham Conservation Area;	Partial	HE welcomes the proposed modification to policy which better reflects the recommendations of the Heritage Impact Assessment. However, the HIA recommendation regarding density on the western part of the site, open space on the eastern part of the site and density and landscaping on the northern part of the site has not been

			<p>The matters of density and landscaping are included in Criterion 1 of Policy ST23/2 which requires <i>Prior approval of a master plan to address access, mix of uses including provision of serviced employment land, layout, density of development, landscaping and conceptual appearance.</i> Along with details of open space the matters cited will form part of the master plan for the development of the site.</p>		<p>incorporated into the policy</p> <p>While we appreciate that density and landscaping are mentioned, the specifics of the location of these are not. Our preference would be for this requirement to be included in the policy criteria, in line with the HIA recommendations. We suggest adding the word density into criterion 7 and reference to open space on eastern part of site would be helpful.</p>
Policy W07/1 Land adjacent Holkham Road	There are no designated heritage assets within this site. We welcome the reference to Holkham Hall Registered Park and Garden and Wells Conservation Area in the policy.	LPS741	Comment noted.	N/A	-
Policy BLA04/A Land East of Langham Road	There are no designated heritage assets on this site. The Glaven Valley CA lies a	LPS742	Comment noted.	N/A	-

	considerable distance away from the site and so development in this location should have limited impact upon the Conservation Area and its setting. We welcome the reference to views of Blakeney Church.				
Policy BRI02 Land west of Astley Primary School	Policy BRI02 Land west of Astley Primary School. Amend the Policy to incorporate HIA wording and also Key Development Considerations diagram.	LPS744	<p>Agree to proposed modification in part, reference PMIN/19.1/02 to add a new policy criterion as follows: Development should conserve or where appropriate enhance the significance of heritage assets (including any contribution made to the significance by setting) both within the site and the wider area including Manor Farmhouse, a Grade II listed building.</p> <p>The Conclusions reached in the Site Assessment booklet took account of the HIA recommendations and concluded that the site is well contained within the landscape with development either side adjacent to the road frontage. The Booklet assessment also noted the concern regarding coalescence between the two settlements from a landscape impact perspective. Although coalescence is not explicitly referred to in the policy wording, criterion 9 requires <i>Retention and enhancement of existing hedgerows and</i></p>	Partial	<p>HE welcomes the proposed modification to policy which better reflects the recommendations of the Heritage Impact Assessment.</p> <p>However, HE continue to recommend that the HIA recommendations for mitigation are included in the policy.</p>

			<i>landscaping to all the site boundaries particularly to the east and west;</i>		
Policy E7 Tat erset Business Park	Policy E7 Tat erset Business Park The Policy needs amending to fully incorporate the wording from the HIA.	LPS746	Agree to proposed modification in part to add a further criterion to the policy PMIN/22.1/04 as follows: 7. Two Scheduled Monuments are situated to the southwest of the site. Development of the site should preserve or enhance these designated heritage assets and their settings.	Partial	HE welcomes the proposed modification to policy.

APPENDIX 2

Areas of Disagreement

Policy/ Paragraphs	HE comment at Regulation 19	Regulation 19 Reference numbers	NNDC comment	HE response (post Regulation 19)
2 Spatial Portrait, Vision, Aims & Objectives	<p>Summary comment (covering LPS716-746 detailed responses). HE highlight the following three issues, which are considered to compromise the overall soundness of the plan:</p> <ol style="list-style-type: none"> 1. the Historic Environment Policy ENV7, where there are considered to be a number of remaining issues with the policy wording, 2. Historic Environment Paper including Heritage Impact Assessments, where ideally the plan is amended to include the HIA recommendations and Key Development Consideration Diagrams. In addition, comments relating to specific HIA's; and 3. the Wind Energy Areas Map, Figure 5. It is considered that the evidence base to support the identification of areas suitable for such development 	LPS764	<p>See detailed comments:</p> <ul style="list-style-type: none"> • above in Appendix 1, and • below, to specific consultation responses including LPS721, LPS727, and LPS730. 	-

	is incomplete, as it does not consider heritage assets.			
Figure 5 Wind Energy Areas map in association with Policy CC2 Renewable & Low Carbon Energy	<p>Include consideration of heritage assets and their setting in development of Wind Energy Map (Figure 5) (<i>in support of Policy CC2 Renewable & Low Carbon Energy</i>) and amend figure accordingly.</p> <p>Alternatively, delete figure 5 and provide greater reference to heritage assets and settings in the policy and supporting text.</p> <p>If the map remains, we would expect additional text on the map to make it clear that detailed assessment has not been undertaken in relation to heritage assets and their settings with corresponding supporting text in the Plan</p>	LPS721	<p>Additional text to Figure 5 title: Wind Energy Areas (<i>based on Landscape Sensitivity Assessment SPD 2021</i>) proposed to give further clarity PMIN/3.2/05.</p> <p>The Council does not consider it necessary to amend Figure 5 as proposed, given its strategic nature covering the district and that designated heritage assets are identified on the Policies Map. Heritage assets and their settings are adequately considered at point 2b of the criteria-based element of the Policy.</p> <p>The map is considered to be a necessary element of the Policy, in providing a positive energy strategy in accordance with Paragraph 155 of the NPPF and which has been informed by guidance in the national PPG, to provide greater certainty for opportunities regarding renewable energy development.</p>	<p>While Historic England support the promotion of renewable energy, we continue to have significant concerns regarding the lack of historic environment evidence underpinning the draft policy and mapping (figure 5).</p> <p>Whilst we acknowledge that the proposed text offers some clarification, we do not consider this sufficient and continue to find the policy and figure 5 unsound for the following three reasons:-</p> <ol style="list-style-type: none"> 1. The identification of specific areas as being suitable for wind energy development is not justified as it is not based upon a sufficiently robust evidence base. There has been no consideration of heritage assets and their settings. We refer you to Historic England Advice Note 15 (February 2021) for further information on commercial scale renewable energy development. 2. The areas which have been identified for wind energy

				<p>development could lead to pressure for such developments in locations which would be likely to result in harm to a number of North Norfolk's most important designated heritage assets. Therefore, it is not effective in protecting the historic environment and is not consistent with national policy.</p> <p>3. A receptor buffering approach is neither appropriate nor sufficient to assess impact upon the significance of heritage assets.</p> <p>In order to make the Plan sound we have recommended that ideally the wind energy map should give consideration to heritage assets and their setting, as described in Historic England Advice Note 15. This additional-evidence is needed now to inform the map. The policy wording and supporting text should also be strengthened. Alternatively, in the absence of additional evidence in relation to the historic environment, we recommend that the figure should be deleted from the Plan.</p>
Policy CC7 Flood Risk & Surface Water Drainage	Reference should be made to the consideration of	LPS723	The Council does not consider it necessary to amend the policy as	We maintain that the policy should include reference to archaeology

	archaeology in planning for SUDs, not only in terms of excavation of land (and potential archaeology) but also in terms of dewatering waterlogged archaeology.		requested. The comment does not relate specifically to the strategic policy proposed and covers matters that are addressed through other specific policies across this Plan, such as ENV7 Protecting and Enhancing the Historic Environment.	and propose the following criterion: <i>'The design of SuDS should take the presence of any buried archaeology into consideration. Direct impacts on buried archaeology should be avoided. Buried archaeological deposits can also be damaged by changes to the water management regime in an area such as a change in groundwater levels or soil moisture content. Where proposals will impact on the significance of designated or non-designated heritage assets, appropriate mitigation should take place as part of the SuDS proposal. Developers should undertake early discussions with Historic England and North Norfolk Council.'</i>
Policy ENV7	The Policy is much improved but there are some remaining issues: In relation to non-designated heritage assets, reference should be made to the need for a balanced judgement	LPS727	Reference to a balanced judgement in the Policy wording with regard to non-designated assets is not considered necessary, being a repetition of the NPPF guidance (para. 203) and as such, would not add any further clarity to the policy.	Criterion 7 of ENV7 currently simply requires sufficient information to demonstrate that any harm has been assessed. As currently worded it fails to indicate how the decision maker should respond. The NPPF para 16 d makes it clear that policies should be 'clearly written and unambiguous, so it is evident how a decision maker

				<p>should react to development proposals’.</p> <p>In the absence of a reference to balanced judgement, the policy fails to indicate how a decision maker should react in the case of proposals affecting non-designated heritage assets.</p> <p>This is also inconsistent with the approach being taken in this policy for designated heritage assets at the end of criterion 5. The plan is therefore internally inconsistent.</p> <p>While it is important that policies don’t repeat the NPPF verbatim, they should both be consistent with and reflect the NPPF.</p> <p>Therefore, we continue to recommend that reference is made to the need for a balanced judgement in criterion 7.</p>
Policy DS1 Development Site Allocations	Revisit supporting text and policy wording to ensure sufficient detail and consistent approach. Amend policies to include recommended wording from HIAs in line with HE’s Advice Note on Site Allocations HEAN3 (paras. 3.1-3.2).	LPS728	The conclusions of the HIAs have been taken into consideration in the evaluation and selection of the preferred site allocations and policy requirements. Professional judgement has been used to determine which of the HIA	We have reviewed the HIAs and Site assessment booklets again and provide our comments on each site below.

	In addition, include the Key Development Considerations diagrams for Policy H20, Policies MUN03/B, ST23/2, BRI01, BRI02 within the Plan.		recommendations to include within the policy wording. More detail can be found in the individual Site Assessment Booklets. The Key Considerations Diagrams are considered to be useful guidance within the published HIA Background Paper 10.	
Policy C22/2 Land west of Pine Tree Farm	Revisit supporting text and policy wording to ensure sufficient detail and consistent approach. Amend policies to include recommended wording from HIAs in line with HE's Advice Note on Site Allocations HEAN3 (paras. 3.1-3.2).	LPS730	The conclusions of the HIAs have been taken into consideration in the evaluation and selection of the preferred site allocations and policy requirements. More detail can be found in the individual Site Assessment Booklets. For information, a further HIA has been carried out for the enlarged site Policy C22/2 Land west of Pine Tree Farm and is included within the updated HIA Background Paper 10.	<p>We welcome the preparation of the revised HIA for the enlarged site.</p> <p>In reviewing the HIA again, the three mitigation recommendations from the HIA that are missing from the policy criteria are:</p> <ul style="list-style-type: none"> • Landscaped buffer along the western boundary of the site • Dwellings of one or one and a half storey height on the southernmost part of the site. • Enhance existing tree belt and landscaping close to Pine Tree Farm and adjacent to Norwich Road (A149). <p>We therefore recommend that the policy criteria are amended as follows:</p>

				<p>4. Careful attention to site layout, building heights and materials in order to minimise the visual impact of the development on the Norfolk Coast Area of Outstanding Natural Beauty. <u>Building heights to be restricted to one or 1.5 storey height on southern part of site;</u></p> <p>8. Retention and enhancement of hedgerows and trees around and within the site, including the protection of existing woodland within site and the provision of a landscaped buffer along the southern <u>and western</u> boundaries;</p> <p>15. Development should preserve and enhance the setting of the grade II listed Pine Tree Farmhouse through careful layout, design and landscaping <u>including enhancement of tree belt and landscaping close to the Farmhouse.</u></p>
Policy H17 Land north of Valley Lane	Criterion 1 of the policy falls short of the recommendations of the HIA. Revisit supporting text and policy wording to ensure sufficient detail and consistent approach. Amend policies to include	LPS731	Comments noted. The Council does not consider it necessary to amend the Plan as proposed. Bullet point 1. The proposed development is located to the rear of existing dwellings which already	In reviewing the HIA again, the two mitigation recommendations from the HIA that are missing from the policy criteria are: <ul style="list-style-type: none"> • Seek to retain a view toward the Glaven Valley from Norwich Road

	recommended wording from HIAs in line with HE's Advice Note on Site Allocations HEAN3 (paras. 3.1-3.2).		<p>impact on views of the Glaven Valley,</p> <p>Bullet point 2. There is already a requirement in Policy H17 under criterion 3 to retain and enhance mature hedgerows and trees around the site.</p> <p>Bullet point 3. There is already a requirement in Policy H17 under criterion 2 to provide appropriate landscaping to soften the development edge with Spout Hill CWS.</p> <p>Bullet point 4. This requirement is already set out in Policy ENV7. The requirements for archaeological assessments are addressed elsewhere in the Plan.</p>	<ul style="list-style-type: none"> • A Heritage Statement is required to assess the archaeological importance of the site. <p>There is currently a good view of the Glaven Valley from Norwich Road between numbers 4a and 6. It is this view that should be retained through careful master planning of the site.</p> <p>We therefore recommend an additional policy criterion as follows:</p> <p><u>'Retention of view towards Glaven Valley from Norwich Road (between 4a and 6 Norwich Road) through careful master planning.'</u></p> <p>We concur that the second point regarding heritage statement is covered by policy ENV7.</p>
Policy H20 Land at Heath Farm	Add recommended wording from HIA and include Key Development Considerations diagram.	LPS732	<p>Comments noted. The Council does not consider it necessary to amend the Plan as requested.</p> <p>A modification to the policy (PMIN/12.2/02) in relation to landscaping has been proposed at Criterion 2:</p> <p>2. provision of a landscape buffer, of approximately 1.3 hectares adjacent</p>	<p>We welcome the intention to include proposed modification regarding a buffer to protect the heritage assets in the south eastern part of the site. However, as currently drafted the policy wording is ambiguous.</p>

			<p>to the east and south-eastern boundary of the site; The form of development, its impact on heritage assets and the need or otherwise for single storey buildings can be considered at application stage.</p>	<p>It is also not clear whether this is in addition to criterion 2 or to replace criterion 2.</p> <p>In reviewing the HIA again, the main mitigation recommendation from the HIA that is missing from the policy criteria relates to density and height:</p> <ul style="list-style-type: none"> • Low density and single storey development to the southern, northern and western parts of the site <p>We therefore recommend an additional policy criterion as follows:</p> <p><i><u>'Low density, single storey development to the southern, northern and western parts of the site.'</u></i></p>
Policy H27/1 Land at Heath Farm	Replace policy wording of Criterion 1 to incorporate recommendations of the HIA.	LPS733	The Council does not consider it necessary to amend the Plan as proposed. The conclusions of the HIA have been taken into consideration in the selection and finalisations of the preferred site allocations and policy requirements. More information can be found in the site assessment booklets. The site is no longer	Site allocation deletion noted.

			available for development as per modification PMIN/12.3/01.	
Policy HV01/B Land east of Tunstead Road	Revisit supporting text and policy wording to ensure sufficient detail and consistent approach. Amend policies to include as requested including recommended mitigation measures set out in HIA.	LPS734	The Council does not consider it necessary to amend the Plan as proposed. The points are already addressed within the site-specific policy for HV01/B	<p>In reviewing the HIA again, the main mitigation recommendation from the HIA that is missing from the policy criteria relates to density and height:</p> <ul style="list-style-type: none"> • Lower density, single storey dwellings on the northern part of the site <p>We therefore recommend amending policy criterion 1 as follows:</p> <p>‘1. Delivery of a carefully designed residential development that will integrate into the surrounding character, <i>with lower density, single storey dwellings on the northern part of the site.</i>’</p>
Policy SH18/1B Land south of Buts Lane	Revisit supporting text and policy wording to ensure sufficient detail and consistent approach. Amend policy wording to include mitigation measures recommended within HIA.	LPS738	<p>The Council does not consider it necessary to amend the Plan as proposed.</p> <p>The provision of landscape buffers is already included within the site-specific policy. Potential impacts on Conservation Areas and their settings is covered elsewhere in the Plan.</p>	<p>In reviewing the HIA again, the main mitigation recommendations from the HIA that is missing from the policy criteria relates to density and height:</p> <ul style="list-style-type: none"> • Lower density dwellings on the north and the western extents of the site • Single storey dwellings on the west of the site to respect the wider landscape

				<p>We therefore recommend an additional policy criterion as follows:</p> <p><i><u>'Low density, development in the northern and western parts of the site. With single storey development on the west of the site.'</u></i></p>
<p>Policy BRI01 Land east of Astley Primary School</p>	<p>There is no reference to the Grade II listed Manor Farmhouse in the supporting text or policy. The policy and paragraph should be amended accordingly. Coalescence of settlements is to be avoided. It is important to maintain the character and distinctiveness of settlements.</p> <p>The Key Development Considerations diagram in the Historic Environment Paper should be included in the Plan.</p>	<p>LPS743</p>	<p>The Council does not consider it necessary to amend the Plan as proposed.</p> <p>The requirements are already set out in the criteria in the site-specific policy. However, the Council subsequently agrees with HE that the policy could usefully incorporate further wording around recognising the historic environment. (We are seeking to agree a further modification – specific wording to be agreed and proposed under the appropriate hearing session).</p> <p>It is not possible to determine the most suitable location for open space at this time. This will be determined through the application process.</p> <p>The Key Considerations Diagrams are considered to be useful as</p>	<p>In reviewing the HIA again, the main mitigation recommendations from the HIA that is missing from the policy criteria are:</p> <p>Development should conserve, or where appropriate enhance, the significance of nearby heritage assets (including any contribution made to that significance by setting) including, Manor Farmhouse, a grade II listed building.</p> <ul style="list-style-type: none"> • Respect and reflect the massing and heights of surrounding dwellings and buildings, many of which are single and one and a half storeys in height; • Existing hedgerows / landscaping to be retained and enhanced on the eastern, western and southern

			<p>guidance within the publicly available HIA document.</p>	<p>boundaries and preferably on northern boundary depending on access arrangements;</p> <p>We therefore recommend amending policy criterion 1 as follows:</p> <p><i>'Retention of existing roadside hedges and setting back of development on both road frontages. <u>Retention and enhancement of hedgerows along southern and eastern boundaries;</u></i></p> <p><i>New criterion:</i> <i><u>'Development to respect height and massing of surrounding area.'</u></i></p>
<p>Policy BRI02 Land west of Astley Primary School</p>	<p>Consideration should be given to the coalescence of the villages of Melton Constable and Briston be the removal of this important gap. Include the Key Development Considerations diagram.</p>	<p>LPS744</p>	<p>More detail can be found in the individual Site Assessment Booklets. The matter of coalescence is discussed in the Briston Site Assessment Booklet for BRI02, where it is concluded that this matter can be dealt with through appropriate site specific policies in respect of landscaping and the design of the site. The Key Considerations Diagrams are considered to be useful as</p>	<p>We welcome the commitment to set back development along the road frontage to maintain a sense of openness and separation in criterion 1.</p> <p>In reviewing the HIA again, the main mitigation recommendations from the HIA that is missing from the policy criteria are: Respect and reflect the massing and heights of surrounding</p>

			<p>guidance within the publicly available HIA document.</p>	<p> dwellings and buildings, which are a mixture of single and two storeys</p> <ul style="list-style-type: none"> • Landscaping to the eastern boundary should be extended and enhanced to create a gap between the set lements • Open space should be located on the eastern boundary to further create a gap between the set lements <p>We therefore recommend amending policy criterion 9 as follows:</p> <p><i>9. Retention and enhancement of existing hedgerows and landscaping to all the site boundaries particularly to the east and west. <u>Landscaping and open space along eastern boundary to retain gap between settlements;</u> and, New criterion: <u>'Development to respect height and massing of surrounding area.'</u></i></p>
<p>Policy MUN03/B Land off Cromer Road and Church Lane.</p>	<p>Amend policy wording to include recommendations from HIA. Include the Key Development Considerations diagram.</p>	<p>LPS745</p>	<p>The policy as writ en already addresses the proposed modifications raised in each bullet point. The Key Considerations Diagrams are considered to be useful as</p>	<p>We welcome criterion 1 and 2 which capture the recommendations in the HIA.</p>

	Update HIA to reflect new site area.		guidance within the published Historic Environment Background Paper 10. The updated HIA for the new site is set out in the updated Background Paper	
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