

**INTRODUCTION: GENERAL COMMENTS – SUMMARIES**

## General Comments

<b>STRATEGY QUESTION: SETTLEMENT/ SITE REFERENCE:</b>	Introduction comments
<b>TOTAL NUMBER OF REPRESENTATIONS:</b>	6
<b>SUPPORT/ OBJECT/ COMMENT BREAKDOWN:</b>	0 Support, 4 Object, 2 Comment

<b>RESPONDENT (OR GROUP OF RESPONDENTS)</b>	<b>SUPPORT/ OBJECT/ COMMENT</b>	<b>BRIEF SUMMARY OF COMMENTS</b>	<b>MAIN ISSUES REQUIRING INVESTIGATION</b>
Historic England	Object	<p>General comment on site assessment booklets for site allocations:            Whilst we have not had the capacity to review every site assessment in the Site Assessments booklet, we have looked at a number of the assessments.            We are concerned that there is currently insufficient evidence in relation to the historic environment in terms of site allocations. To that end, we suggest that you review the site assessments to ensure that there is sufficient and robust in its consideration of the historic environment.            We refer you to our advice on the Historic Environment and Local Plans and Sites Allocations which is set out in the following documents:            HE Good Practice Advice in Planning 1 “The historic environment in local plans: <a href="https://historicengland.org.uk/images-books/publications/gpa1-historic-environment-local-plans/">https://historicengland.org.uk/images-books/publications/gpa1-historic-environment-local-plans/</a>            HE Advice Note 3 “The Historic Environment and site allocations in local plans: <a href="https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/">https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/</a></p>	<p>Insufficient evidence in site assessments relating to historic environment. Suggest review of assessments to ensure that there is sufficient and robust consideration of the historic environment. Reference to Historic England Guidance</p> <p>Suggestion that a brief Heritage Impact Assessment (HIA) is undertaken for ALL</p>

	<p>Our advice note 3 on site allocations in local plans sets out a suggested approach to assessing sites and their impact on heritage assets (a Heritage Impact Assessment or HIA). It advocates 5 steps, including understanding what contribution a site, in its current form, makes to the significance of the heritage asset/s, and identifying what impact the allocation might have on significance. This should be applied to the assessment and selecting of sites within a plan.</p> <p>In essence, it is important that you</p> <ol style="list-style-type: none"> <li>a) Identify any heritage assets that may be affected by the potential site allocation.</li> <li>b) Understand what contribution the site makes to the significance of the asset</li> <li>c) Identify what impact the allocation might have on that significance</li> <li>d) Consider maximising enhancements and avoiding harm</li> <li>e) Determine whether the proposed allocation is appropriate in light of the NPPFs tests of soundness</li> </ol> <p>In assessing sites it is important to identify those sites which are inappropriate for development and also to assess the potential capacity of the site in the light of any historic environment (and other) factors. This should be more than a distance based criteria but rather a more holistic process which seeks to understand their significance and value. Whilst a useful starting point, a focus on distance or visibility alone as a gauge is not appropriate.</p> <p>We suggest that a brief Heritage Impact Assessment (HIA) is undertaken for ALL sites in the Plan following the 5 step methodology, with more detailed HIA being undertaken for selected sites where the heritage issues are greater. It is important that the evidence base is proportionate and so the level of detail will vary depending on the site, its size and the number and significance of heritage assets affected. We have identified a number of sites in this table and the covering letter where a more detailed assessment would be required. This is not an exhaustive list and it may be that in preparing the brief HIAs you identify other sites which also warrant a fuller assessment.</p> <p>The findings of the assessments should then be incorporated into the relevant site allocations policies (e.g. site capacity, potential mitigation and enhancements etc.)</p>	<p>sites in the Plan following the 5 step methodology, with more detailed HIA being undertaken for selected sites where the heritage issues are greater. The findings of the assessments should then be incorporated into the relevant site allocations policies (e.g. site capacity, potential mitigation and enhancements etc.) to form part of the evidence base for the Local Plan.</p>
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		The assessments could be included either in the Site Assessments or into the Historic Environment Topic Paper. Either way, it is important that they form part of the evidence base for the Local Plan.	
Historic England	Object	<p>General Comment on site allocations policy wording:  It is important that policies include sufficient information regarding criteria for development. Paragraph 16d of the NPPF states that policies should provide a clear indication of how a decision maker should react to a development proposal. Development should conserve or where appropriate enhance the significance of heritage assets including [list heritage assets on site and nearby] including any contribution made to their significance by their settings. Appropriate mitigation measure including ... will be required’.</p> <p>As previously advised the policy wording should mention the specific designated heritage assets both on site and nearby.</p> <p>The policy and supporting text should also refer to specific appropriate mitigation measures e.g. landscaping or careful design or maintaining key views or buffer/set back/breathing space etc.</p> <p>Therefore, please revisit the site allocations and ensure that policy wording/supporting text is consistent with the advice above.</p> <p>By making these changes to policy wording the Plan will have greater clarity, provide greater protection to the historic environment and the policies will be more robust.</p> <p>Given the inclusion of reference to significance and setting we suggest that these terms (which are quite technical) are included in a glossary.</p>	<p>Revisit the site allocations and ensure that policy wording/supporting text is consistent with Paragraph 16d of the NPPF.</p> <p>By making these changes to policy wording the Plan will have greater clarity, provide greater protection to the historic environment and the policies will be more robust.</p> <p>Given the inclusion of reference to significance and setting we suggest that these terms (which are quite technical) are included in a glossary.</p>
Historic England	Object	In the last para for settlements, the text states that all new and carried forward allocations...measures to protect the environment. Can you please insert the words historic and natural environment to make it clear that we mean both?	Clarification required that environment includes ‘historic environment’

Orbit Homes	Object	<p>We strongly object to the approach to the site assessment taken within the draft GNLP Sites document. Our comments below should be read in conjunction with the comments made on the approach to village clusters which are interlinked to how the site assessment approach has been undertaken and preferred sites decided.</p> <p>The decisions made within the draft GNLP Sites document are informed by the individual site assessment booklets which in turn have been informed by the various iterations of the HELAA.</p> <p>It is noted that no site assessment booklets have been produced for the South Norfolk Village Clusters given the proposed approach to produce a separate document to allocate these sites (see comments on this approach in Section 2).</p> <ul style="list-style-type: none"> <li>• It is not clear how the SA has featured in the site assessment process. We suggest that this is made more explicit for the next round of consultation, and would welcome any clarity on this point in the meantime.</li> <li>• Some of the site assessment stages which have taken place are vague in detail and process. For example, the Stage 3 commentary recorded includes both attributed and non-attributed commentary (so it is unclear whether comments are from promoters, the Council, other stakeholders of objectors), and whilst it includes some stakeholder comments (e.g. Wildlife Trust) it does not include others.</li> <li>• Stage 4 (Discussion of Submitted Sites) does not include any written evidence (such as written minutes of discussions; a record of what criteria shaped these discussions; or a list of main outcomes), so it is not clear to a member of the public or a developer why a particular site has been excluded from the next stage of assessment.</li> </ul> <p>We suggest that without further clarity on this matter, the assessment process is flawed. Again, this matter should be addressed as part of the next round of consultation.</p>	<p>Objection to process of site assessment including gaps (such as SN village clusters, statutory consultees) an absence of supporting evidence.</p> <p>Suggestion that this issue needs clarifying as soon as possible &amp; remedied by the next consultation.</p>
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Environment Agency (Eastern Region)	Comment	Any site allocations that will result in works in, under, over or within 8 metres (m) from a fluvial main river and from any flood defence structure or culvert or 16m from a tidal main river and from any flood defence structure or culvert may need an Environmental Permit for Flood Risk Activities from the Environment Agency for works. Application forms and further information can be found at: <a href="https://www.gov.uk/guidance/flood-risk-activities-environmental-permits">https://www.gov.uk/guidance/flood-risk-activities-environmental-permits</a> . Anyone carrying out these activities without a permit where one is required, is breaking the law.	General instructions relating to development around fluvial main rivers, tidal main rivers and flood defence structures.
Historic England	Comment	General Comment: We suggest that the bullet points in the site allocations are numbers to make it easier to reference policy and use the Plan	Policy formatting could be clearer for reference.