

Appendix A: Table of Historic England’s comments on the Draft Regulation 18 South Norfolk Village Clusters Housing Allocations Plan

Section	Support/ Object	Comments	Suggested Change
Plan Objectives		We broadly support object 3 Protect the character of villages and their settings. However, we suggest that specific reference is made to the historic environment in this objective. Also, it is not just about protecting the character of villages and their settings but also the wider landscape	<i>Include reference to the need to protect and enhance the historic environment in this objective.</i> <i>Include reference to wider landscapes.</i>
Policy SNVC1 Standard requirements		We support the principle of a standard policy to avoid un-necessary repetition in policies. However, there is currently no mention of the historic environment in this policy. We suggest that there should be a criterion to reference the historic environment.	<i>Include criterion for the historic environment to read</i> <i>Development should conserve/sustain or where appropriate enhance the significance of designated and non-designated heritage assets both on-site and in the surrounding area. This includes any contribution made to its significance by its setting.</i>
Policy SNVC2 Design		We broadly support the criterion in this policy. However, specific reference should be made to local vernacular and materials. Reference should also be made to heritage assets and their settings.	<i>Refer to local vernacular and materials.</i> <i>Refer to heritage assets and their settings.</i>
Site Assessment		We are concerned that there is insufficient evidence in relation to the historic environment to support some of the site allocations. We have reviewed the HEELA methodology and criteria and have also reviewed several the assessments, both in the HEELA and the more site assessment booklets. Whilst these are a helpful starting point and goes	

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		<p>some way with the RAG assessments etc., we are looking for more detail, particularly in relation to the amber sites.</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/ (often referred to as Heritage Impact Assessments or HIAs). In particular, they do not properly consider the significance of the heritage assets, the contribution of setting to that significance, the impact of development upon the significance of those assets and do not consider potential mitigation and enhancement.</p> <p>Therefore, HIAs should be prepared for a number of sites; this is imperative to ensure a robust evidence base for the Local Plan. These should be prepared in advance of the next draft of the Plan to inform whether some sites are suitable, but for the majority of sites to inform the potential mitigation and the policy wording. 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. It should consider significance of assets (include any contribution made to that significance by setting), the impact of development upon the significance of those assets (level of harm etc), and make recommendations about potential mitigation (density, height, layout, open space landscaping etc).</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>	

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		<p>We would remind you that paragraph 32 of the NPPF makes it clear that significant adverse impacts should be avoided wherever possible and alternative options pursued. Only where these impacts are unavoidable should suitable mitigation measures be proposed.</p>	
Evidence Base		<p>We have set out our concerns in relation to insufficient historic environment evidence to support some site allocations and the need for HIAs.</p> <p>It is important that your plan is underpinned by appropriate evidence.</p> <p>Any evidence base should be proportionate. However, with a local plan we would expect to see a comprehensive and robust evidence base. Sources include:</p> <ul style="list-style-type: none"> • National Heritage List for England. www.historicengland.org.uk/the-list/ • Heritage Gateway. www.heritagegateway.org.uk • Historic Environment Record. • National and local heritage at risk registers. www.historicengland.org.uk/advice/heritage-at-risk • Non-designated or locally listed heritage assets (buildings, monuments, parks and gardens, areas) • Conservation area appraisals and management plans • Historic characterisation assessments e.g. the Extensive Urban Surveys and Historic Landscape Characterisation Programme or more local documents. www.archaeologydataservice.ac.uk/archives/view/EUS/ • Environmental capacity studies for historic towns and cities or for historic areas e.g. the Craven Conservation Areas Assessment Project. www.cravenc.gov.uk/CHttpHandler.ashx?id=11207&p=0 • Detailed historic characterization work assessing impact of specific proposals. • Heritage Impact Assessments looking into significance and setting especially for strategic sites or sites with specific heritage impacts • Visual impact assessments. • Archaeological assessments. 	

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		<ul style="list-style-type: none"> • Topic papers. <p>We advise you to carefully consider the list above.</p> <p>We advocate the preparation of a topic paper in which you can catalogue the evidence you have gathered and to show how that has translated into the policy choices you have made. Do this from the start, as a working document, that you add to throughout the plan preparation process, not just before EiP.</p> <p>It can also be useful to include in this a brief heritage assessment of each site allocation, identifying any heritage issues, what you have done to address them and how this translates into the wording in your policy for that site allocation policy.</p>	
General comment of site allocations and policy wording		<p>General comments on allocations</p> <p>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.</p> <p>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>Typical wording for the policy criterion might be:</p> <p>Development should conserve or where appropriate enhance the significance of heritage assets including <i>[list heritage assets on site and nearby – these should include designated and non-designated heritage assets]</i> including any contribution made to their significance by their settings. Appropriate mitigation measures [as identified through the</p>	

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		<p>Heritage Impact Assessment] including ... will be required.'</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>	
		Please note we have only reviewed the preferred sites, not the shortlisted or rejected sites.	
Alburgh and Denton		<p>No preferred sites</p> <p>No changes to settlement limits</p> <p>No comments</p>	
Alpington, Yelverton and Bergh Apton			
Site SN0400 Church Meadow, Alpington		Although this site is located quite close to the grade, I listed St Mary's Church, the site is tucked behind existing development and so the impact on the heritage asset and its setting would be minimal.	
Site SN0529SL Nichols Road, Alpington		No comments	
Site SN0412REV Former Concrete works, Church Road, Bergh Apton		<p>There are no designated heritage assets on site. However, there is a cluster of grade II listed buildings to the east of the site. However, the redevelopment of the former cement works will enhance the setting of these assets rather than detract from them.</p> <p>The policy for this site should reference the nearby heritage assets.</p>	<p><i>Add policy criterion to read,</i></p> <p><i>Development should preserve and enhance the significance of the nearby listed buildings (including any contribution made to that significance by setting).</i></p>
Aslacton, Great			

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Moulton and Tibenham			
Settlement limit change		No comments	
Site SN0459 Land off Church Road, Aslacton		Whilst there are no designated heritage assets within the site boundary, there is a grade II listed Church Farmhouse to the south east of the site. However, given the distance and intervening development and vegetation, we consider that the development of the proposed allocation would have limited impact of the setting of the heritage asset.	
Barford, Marlingford, Colton and Wramplingham		No preferred sites No changes to settlement limits No comments	
Barnham Broom, Kimberley, Carleton Forehoe, Runhall and Brandon Parva			
Site SN0018SL Land north of Norwich Road, adj 101		No comments	
Site SN2110 Land south of Norwich Road, Barnham Broom		No comments	
Site SN4051 Land on the corner of Bell Road and Norwich Road, Barnham Broom		No comments	
Bawburgh		No changes to settlement limits	
Site SN4053 Land to the east of	Object	Whilst there are no designated heritage assets within this site, the site lies immediately to the south of the boundary of the Bawburgh Conservation	<i>Complete an HIA to inform the allocation of the site including</i>

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Stocks Hill		<p>Area. Any development of this site therefore has the potential to affect the Conservation area and its setting including views into and out of the Conservation area.</p> <p>A heritage impact assessment of the site should be undertaken to assess the impact of the proposed development on the Conservation Area and determine if allocation of this site is appropriate, and if it is what mitigation may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement.</p>	<i>any mitigation, enhancement and policy wording.</i>
Bressingham			
Site: SN3019, Land west of School Road	Object	<p>Although there are no designated heritage assets on site, the site lies immediately opposite the grade II listed Pine Tree Cottage. Development of this site has the potential to impact upon the significance of this designated heritage assets through development within its setting.</p> <p>A heritage impact assessment of the site should be undertaken to assess the impact of the proposed development on the listed building and determine if allocation of this site is appropriate, and if it is what mitigation may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement.</p>	<i>Complete an HIA to inform the allocation of the site including any mitigation, enhancement and policy wording.</i>
Site: SN4036 - Land to the east of School Road	Object	<p>Although there are no designated heritage assets on site, the site lies immediately adjacent to the grade II listed Pine Tree Cottage. Development of this site has the potential to impact upon the significance of this designated heritage assets through development within its setting.</p> <p>A heritage impact assessment of the site should be undertaken to assess the impact of the proposed development on the listed building and determine if allocation of this site is appropriate, and if it is what mitigation may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement.</p>	<i>Complete an HIA to inform the allocation of the site including any mitigation, enhancement and policy wording.</i>
Brooke, Kirstead and Howe			
Site:		Although there are no designated heritage assets on site, the site lies to the	<i>Complete an HIA to inform the</i>

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SN0432REVA, East of Norwich Road		<p>south east of the grade II listed Brooke Lodge, dating from c1835 and to the north of the Brooke Conservation Area. Any development of the site has the potential to impact on the significance of these designated heritage assets.</p> <p>A heritage impact assessment of the site should be undertaken to assess the impact of the proposed development on the listed building and conservation area and determine if allocation of this site is appropriate, and if it is what mitigation may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement.</p>	<i>allocation of the site including any mitigation, enhancement and policy wording.</i>
Bunwell			
Site: SN0537, Land to the north of Bunwell Street		There are no designated heritage assets on site. Green Farmhouse listed at grade II, lies to the east of the site. However, given the distance we consider that the development of the proposed allocation would have limited impact of the setting of the heritage asset.	
Burston, Shimpling and Gissing		To be considered as part of the Diss and District Neighbourhood Plan	
Carleton Rode		No comments	
Dickleburgh		To be considered as part of the Dickleburgh Neighbourhood Plan	
Ditchingham, Broome, Hedenham and Thwaite			
Site: SN0373, Land between Thwaite Road and Tunneys Lane		No comments	
Site: SN2011SL, Land off Lamberts Way, Ditchingham		No comments	
Earsham			
Site: SN0218, Land north of The Street		No comments	

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SN0390, Land east of School Road		There are no designated heritage assets on site. The Close listed at grade II, lies to the south of the site. However, given the distance we consider that the development of the proposed allocation would have limited impact of the setting of the heritage asset.	
Forngett St Mary and Forngett St Peter		No preferred sites No changes to settlement limits No comments	
Gillingham, Geldeston, and Stockton			
Site: SN0437, Land off Kells Way, Geldeston		There are no designated heritage assets on site. However, the site is adjacent to the Gedleston Conservation Area. There is also a pair of grade II listed cottages to the west of the site at West End. Any development of the site has the potential to impact on the significance of these designated heritage assets. A heritage impact assessment of the site should be undertaken to assess the impact of the proposed development on the listed building and conservation area and determine if allocation of this site is appropriate, and if it is what mitigation may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement.	<i>Complete an HIA to inform the allocation of the site including any mitigation, enhancement and policy wording.</i>
Site: SN0478, Land south of GIL 1, Gillingham		No comments	
Hales and Heckingham, Langley with Hardley, Carleton St Peter, Claxton, Raveningham and Sisland			
Site: Part of SN0308, Land off Briar Lane, Hales		Whilst there are no designated heritage assets on the site, the former Hales Hospital (grade II listed) lies to the east of the site. Therefore, any development of this site has the potential to impact upon the setting (and	<i>Complete an HIA to inform the allocation of the site including any mitigation, enhancement</i>

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		<p>significance) of this heritage asset.</p> <p>A heritage impact assessment of the site should be undertaken to assess the impact of the proposed development on the listed building and determine if allocation of this site is appropriate, and if it is what mitigation may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement.</p>	<p><i>and policy wording.</i></p>
<p>Hempnall, Topcroft Street, Morningthorpe, Fritton, Shelton and Hardwick</p>			
<p>Site: SN0220SL, Land at Millfields</p>		<p>Whilst there are no designated heritage assets on the site, the disused windmill (grade II listed) lies to the east of the site. Therefore, any development of this site has the potential to impact upon the setting (and significance) of this heritage asset.</p> <p>A heritage impact assessment of the site should be undertaken to assess the impact of the proposed development on the listed building and determine if allocation of this site is appropriate, and if it is what mitigation may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement.</p>	<p><i>Complete an HIA to inform the allocation of the site including any mitigation, enhancement and policy wording.</i></p>
<p>Site: SN1015, Land adjacent to the primary school, The Street</p>		<p>The site is located almost entirely within the Hempnall Conservation Area. It lies opposite two grade II listed buildings, Lime Tree Cottage, and Pevensey House and close to a third grade II listed building, the Hollies. Therefore, any development of this site has the potential to impact upon the significance of these heritage assets.</p> <p>A heritage impact assessment of the site should be undertaken to assess the impact of the proposed development on the listed buildings and conservation area and determine if allocation of this site is appropriate, and if it is what mitigation may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including</p>	<p><i>Complete an HIA to inform the allocation of the site including any mitigation, enhancement and policy wording.</i></p>

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		any mitigation and enhancement.	
Heywood		No comments	
Keswick and Intwood		No preferred sites No changes to settlement limits No comments	
Ketteringham		No preferred sites No changes to settlement limits No comments	
Kirby Cane and Ellingham			
Site: SN0305, Land South of Mill Road, Ellingham		No comments	
Site: SN0348, Land to the South of Old Yarmouth Road, Kirby Row, Kirby Cane		No comments	
Site: SN3018, Florence Way, Ellingham		No comments	
Little Melton and Great Melton			
Site: SN1046REV, Glenhaven, Great Melton Road, Little Melton		No comments	
Site: SN4052, Land south of School Lane and east of Manor Farm Barns, Little Melton		Whilst there are no designated heritage assets on the site, the Manor House (grade II listed) lies to the south west of the site. Therefore, any development of this site has the potential to impact upon the significance of this heritage asset. A heritage impact assessment of the site should be undertaken to assess	<i>Complete an HIA to inform the allocation of the site including any mitigation, enhancement and policy wording.</i>

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		the impact of the proposed development on the listed building and determine if allocation of this site is appropriate, and if it is what mitigation may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement.	
Morley and Deopham		No preferred sites No changes to settlement limits No comments	
Mulbarton, Bracon Ash, Swardeston and East Carleton		Although we understand that changes are proposed to the settlement limits, these are not clearly shown on the maps.	
Site: SN0204, Bobbins Way, Swardeston		No comments	
Site: SN2038, South of Rectory Lane, Mulbarton		No comments	
Needham, Brockdish, Starston and Wortwell			
Site: SN2036, Land at the junction of High Road and Low Road, Wortwell		<p>Whilst there are no designated heritage assets within this site, the grade II listed Bell Inn lies opposite this site. Another grade II listed property, known as Premises of Mr Brown, lies to the north of the site. Therefore, any development of this site has the potential to impact upon the significance of these heritage assets.</p> <p>A heritage impact assessment of the site should be undertaken to assess the impact of the proposed development on the listed buildings and determine if allocation of this site is appropriate, and if it is what mitigation may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement.</p>	<i>Complete an HIA to inform the allocation of the site including any mitigation, enhancement and policy wording.</i>

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		This is an important rural gap site in the village and consideration should be given to that role in combination with the setting of the heritage assets.	
Site: SN2065REV, Land north of High Road and Harmans Lane, Needham		<p>Whilst there are no designated heritage assets within this site, the grade I listed Church of St Peter, its boundary wall listed at grade II and Ivy Farmhouse, also listed at grade II lie to the south west of the site. Therefore, any development of this site has the potential to impact upon the significance of these heritage assets.</p> <p>A heritage impact assessment of the site should be undertaken to assess the impact of the proposed development on the listed buildings and determine if allocation of this site is appropriate, and if it is what mitigation may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement.</p> <p>Again, this is an important rural gap site in the village and consideration should be given to that role in combination with the setting of the heritage assets.</p>	<i>Complete an HIA to inform the allocation of the site including any mitigation, enhancement and policy wording.</i>
Site: SN4069SL, Land south of Scole Road, Brockdish		<p>The site is located entirely within the Brockdish Conservation Area and opposite the grade II listed White House Farmhouse. Therefore, any development of this site has the potential to impact upon the significance of these heritage assets including the setting of the Farmhouse.</p> <p>A heritage impact assessment of the site should be undertaken to assess the impact of the proposed development on the listed building and conservation area and determine if allocation of this site is appropriate, and if it is what mitigation may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement.</p>	<i>Complete an HIA to inform the allocation of the site including any mitigation, enhancement and policy wording.</i>
Newton Flotman and Swainsthorpe			
Site: SN4024,		No comments	

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Land off Alan Avenue, Newton Flotman			
Pulham Market and Pulham St Mary			
Site: SN1024, Ladbrookes, Tattlepot Lane, Pulham Market		<p>This site lies immediately adjacent to the Pulham Market Conservation Area. Therefore, any development of this site has the potential to impact upon the significance of the Conservation Area.</p> <p>A heritage impact assessment of the site should be undertaken to assess the impact of the proposed development on the conservation area and determine if allocation of this site is appropriate, and if it is what mitigation may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement.</p>	<i>Complete an HIA to inform the allocation of the site including any mitigation, enhancement and policy wording.</i>
Site: SN1052REV, Land at Norwich Road, Pulham St Mary		Although Hill Farmhouse, grade II listed lies to the north of the site, the site is screened by the intervening woodland and so no impact would be had on the significance of this asset.	
Rockland St Mary, Hellington and Holverston			
Site: SN2007, Land south of New Inn Hill, Rockland St Mary & (Part of) SN0531, Land west of Lower Road, Rockland St Mary		<p>Whilst there are no designated heritage assets within the site boundary, three grade II listed buildings (Old Hall and two barns) lie around the western end of the site. We therefore have concerns about built development of the western end of the site.</p> <p>A heritage impact assessment of the site should be undertaken to assess the impact of the proposed development on the listed buildings and determine if allocation of this site is appropriate, and if it is what mitigation may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and</p>	<i>Complete an HIA to inform the allocation of the site including any mitigation, enhancement and policy wording.</i>

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		enhancement.	
Site: SN2064REV, Land to the south of The Street, Rockland St Mary		No comments	
Roydon		To be considered as part of the Diss and District Neighbourhood Plan	
Saxlingham Nethergate		No preferred sites No changes to settlement limits No comments	
Scole		To be considered as part of the Diss and District Neighbourhood Plan	
Seething and Mundham		No comments on the proposed changes to settlement limits.	
Site: SN0405, Land to North and South of Brooke Road, Seething		A significant portion of this site lies within the Seething Conservation Area. Therefore, any development of this site has the potential to impact upon the significance of the Conservation Area. A heritage impact assessment of the site should be undertaken to assess the impact of the proposed development on the conservation area and determine if allocation of this site is appropriate, and if it is what mitigation may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement.	<i>Complete an HIA to inform the allocation of the site including any mitigation, enhancement and policy wording.</i>
Site: SN2148, Land to the west of Mill Lane, Seething		No comments	
Site: SN0406SL, Land to the west of Seething Street, Seething		This site lies within the Seething Conservation Area. Therefore, any development of this site has the potential to impact upon the significance of the Conservation Area. A heritage impact assessment of the site should be undertaken to assess the impact of the proposed development on the conservation area and determine if allocation of this site is appropriate, and if it is what mitigation	<i>Complete an HIA to inform the allocation of the site including any mitigation, enhancement and policy wording.</i>

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		may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement.	
Site: SN0587SL, Land to the west of Seething Street, Seething		<p>This site is adjacent to the Seething Conservation Area and close to the grade II listed Breydon Cottage and The Walnuts. Therefore, any development of this site has the potential to impact upon the significance of these heritage assets.</p> <p>A heritage impact assessment of the site should be undertaken to assess the impact of the proposed development on the listed buildings and conservation area and determine if allocation of this site is appropriate, and if it is what mitigation may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement.</p>	<i>Complete an HIA to inform the allocation of the site including any mitigation, enhancement and policy wording.</i>
Spooner Row and Suton			
Site: SN0444, Land west of Bunwell Road, Spooner Row		<p>Whilst there are no designated heritage assets within the site, the site lies immediately to the north east of the grade II listed property, The Orchards. Therefore, any development of this site has the potential to impact upon the significance of this heritage asset. We appreciate that the property is well screened by existing landscaping.</p> <p>However, a heritage impact assessment of the site should be undertaken to assess the impact of the proposed development on the listed building and determine if allocation of this site is appropriate, and if it is what mitigation may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement.</p>	<i>Complete an HIA to inform the allocation of the site including any mitigation, enhancement and policy wording.</i>
Site: SN0567, Land south of Station Road and west of Queensland,		No comments	

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Spooner Row & (Part) SN2082, Land south of Station Road and east of Top Common			
Stoke Holy Cross, Shotesham and Caistor St Edmund & Bixley			
Site: SN0202, Land north of and adjoining Long Lane, Stoke Holy Cross		No comments	
Surlingham, Bramerton and Kirby Bedon		No preferred sites No changes to settlement limits No comments	
Tacolneston and Fornsett End			
Site: (Part of) SN1057, Land to the west of Norwich Road		No comments	
Tasburgh			
Site: SN4079, Land north of Church Road and west of Tasburgh School		<p>While there are no designated heritage assets within the site, the grade II listed Old Hall Farmhouse lies immediately to the north west of the site. In addition, the scheduled monument (a hillfort, known as 'Camp in Village', lies to the north of the site, which also includes the grade I listed Church of St Mary, and grade II listed war memorial and Rectory.</p> <p>Therefore, any development of this site has the potential to impact upon the significance of these heritage assets. We are particularly concerned about the potential impacts on the Farmhouse, given its proximity.</p>	<i>Complete an HIA to inform the allocation of the site including any mitigation, enhancement and policy wording.</i>

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		<p>We do however appreciate this is seeking to increase the density of an existing allocation.</p> <p>A heritage impact assessment of the site should be undertaken to assess the impact of the proposed development on the listed buildings and conservation area and determine if allocation of this site is appropriate, and if it is what mitigation may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement.</p>	
Tharston, Hapton and Flordon			
Site: SN4048, Land to the north of The Street, Hapton		No comments	
Thurlton and Norton Subcourse			
Site: SN0149, Land adjacent to Holly Cottage, west of Beccles Road, Thurlton		No comments	
Thurton and Ashby St Mary		No preferred sites No changes to settlement limits No comments	
Tivetshall St Mary and Tivetshall St Margaret			
Site: SN0319, Pear Tree Farm, West of The		No comments	

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Street, Tivetshall St Margaret			
Site: SN3002SL, Land south of Green Pastures, west of The Street, Tivetshall St Margaret		<p>There are no designated heritage assets on the site. There are two grade two listed buildings, Croft House and Croft Cottage to the south east of the site. Therefore, any development of this site has the potential to impact upon the significance of these heritage assets.</p> <p>A heritage impact assessment of the site should be undertaken to assess the impact of the proposed development on the listed buildings and determine if allocation of this site is appropriate, and if it is what mitigation may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement.</p>	<i>Complete an HIA to inform the allocation of the site including any mitigation, enhancement and policy wording.</i>
Toft Monks, Aldeby, Haddiscoe, Wheatacre and Burgh St Peter			
Site: (Part of) SN0414, Land south of Beccles Road, Haddiscoe		<p>Whilst there are no designated heritage assets on site, the grade I listed St Marys Church, together with a War Memorial and monument to William Salter, both of which are listed at grade II, lie to the west of the site. Therefore, any development of this site has the potential to impact upon the significance of these heritage assets through development within the setting of the assets.</p> <p>A heritage impact assessment of the site should be undertaken to assess the impact of the proposed development on the listed buildings and determine if allocation of this site is appropriate, and if it is what mitigation may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement.</p>	<i>Complete an HIA to inform the allocation of the site including any mitigation, enhancement and policy wording.</i>
Site: SN4017, Land north of Staithe Road,		No comments	

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Burgh St Peter			
Site: SN4015SL, Land west of Mill Road, Burgh St Peter		No comments	
Wacton		No preferred sites No changes to settlement limits No comments	
Wicklewood			
Site: SN0577REVA and REVB, Land to the south of Wicklewood Primary School		No comments	
Site: SN4045SL, Land south of Hackford Road		<p>Whilst there are no designated heritage assets on this site, the grade I listed church of All Saints and the grade II listed war memorial lie to the north of the site. However, the intervening trees provide an effective screen to the site. We suggest that additional planting along the northern boundary of the site would help to safeguard the setting of the church.</p> <p>A heritage impact assessment of the site should be undertaken to assess the impact of the proposed development on the listed buildings and determine if allocation of this site is appropriate, and if it is what mitigation may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement.</p>	<p><i>Complete an HIA to inform the allocation of the site including any mitigation, enhancement and policy wording.</i></p> <p><i>Reference the grade I listed church and grade II war memorial in the policy and include a requirement for landscaping along the northern edge of the site to protect the setting of the church</i></p>
Winfarthing and Shelfanger			
Site: SN4050, Land to the west of Hall Road, Winfarthing		No comments	

Section	Support/ Object	Comments	Suggested Change
Site: SN4055, Land off The Street, Winfarthing		<p>Whilst there are no designated heritage assets on this site, the Winfarthing Conservation Area and grade II listed School house lie approximately 50metres to the north of the site. Therefore, any development of this site that the potential to impact upon the significance of these heritage assets through development within the setting of the assets.</p> <p>A heritage impact assessment of the site should be undertaken to assess the impact of the proposed development on the listed buildings and determine if allocation of this site is appropriate, and if it is what mitigation may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement.</p>	<i>Complete an HIA to inform the allocation of the site including any mitigation, enhancement and policy wording.</i>
Woodton and Bedingham			
Site: SN0262, Land north of Church Road, Woodton		<p>Whilst there are no designated heritage assets on this site, the grade II listed Rectory lies to the east of the site and the grade II listed Manor Farmhouse lies to the north of the site. Therefore, any development of this site that the potential to impact upon the significance of these heritage assets through development within the setting of the assets.</p> <p>A heritage impact assessment of the site should be undertaken to assess the impact of the proposed development on the listed buildings and determine if allocation of this site is appropriate, and if it is what mitigation may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement.</p>	<i>Complete an HIA to inform the allocation of the site including any mitigation, enhancement and policy wording.</i>
Site: SN0268SL, Land north of Church Road, Woodton		No comments	
Site: (Northern End of) SN0278,		No comments	

Section	Support/ Object	Comments	Suggested Change
Land south of Church Road, Woodton			
Wrenningham Ashwellthorpe and Fundenhall			
Site: SN0017SL - Land to the west of New Road, Ashwellthorpe & SN0242 - Land to the west of New Road, Ashwellthorpe		No comments	
Site: SN2183 - Land south of Wymondham Road, Wrenningham		<p>This site lies just to the north of the grade II* Poplars and grade II listed associated barn. Therefore, any development of this site that the potential to impact upon the significance of these heritage assets through development within the setting of the assets.</p> <p>We have particular concerns about this site, leading us to question the very principle of development on the site. The extent of the historic settlement is clearly defined, and there are views of the roof of the Poplars across the field in question. Development would impact the setting of these assets.</p> <p>A heritage impact assessment of the site should be undertaken to assess the impact of the proposed development on the listed buildings and determine if allocation of this site is appropriate, and if it is what mitigation may be required. The findings of the HIA should inform whether the site is allocated and if it is, the policy criterion including any mitigation and enhancement.</p>	<i>Complete an HIA to inform the allocation of the site including any mitigation, enhancement and policy wording.</i>
Monitoring		We recommend including an indicator for the historic environment included in the framework.	<i>Include an indicator for the historic environment in the framework.</i>
Sustainability		We are concerned at the over-reliance of GIS distance-based analysis for	

Section	Support/ Object	Comments	Suggested Change
Appraisal		<p>the Sustainability Appraisal (paras 5.1.1 – 5.13. The report itself comments of the limitations of this and states that it is not technically appraisal. And little of no potential for reach conclusions on significant effects. The report uses the example of biodiversity features. The same issue applies for heritage assets.</p> <p>A purely distance based approach is not appropriate. The impact of proposals on the significance of heritage assets should be taken into consideration at an early stage. In terms of sites, this should be based on more than just measuring the proximity of a potential allocation to heritage assets.</p> <p>Impacts on significance are not just based on distance or visual impacts, and assessment requires a careful judgment based on site visits and the available evidence base. The application of a standard proximity test (e.g. is the site within a set distance of a heritage asset) should not be used as it can lead to misleading results.</p> <p>A simple matrices approach is not considered sufficient. We would want to see a narrative-based approach that properly considers more nuanced issues in relation to setting and significance of both designated and non-designated heritage assets.</p> <p>The analysis at section 9.8 again seems to overly focus on proximity.</p> <p>We welcome the reference at 9.8.6 for the need to ensure policy in place to mitigate for historic environment impacts. We have identified a number of sites where we consider further heritage assessment is needed. These assessments should make recommendations regarding appropriate mitigation and this should then be incorporated into individual site policy wording.</p> <p>In future SA reports, please ensure the correct notation is used for listed</p>	

Section	Support/ Object	Comments	Suggested Change
		<p>buildings eg grade1 should be grade I, grade 2 should be grade II.</p> <p>The findings of the Analysis on pages 48 -52, and Table A further highlights our concern that the analysis has been overly focused on distance.</p> <p>We note that Scheduled monuments do not appear in Table A</p> <p>The appraisals from p76 following do give a slightly fuller discussion of the historic environment; however, the analysis is still somewhat superficial.</p> <p>This again points to the need for HIAs of particular sites.</p>	