

Appendix A: Table of Historic England's comments on the Draft Regulation 19 South Norfolk Village Clusters Housing Allocations Plan

Section	Sound/ Unsound	Comments	Suggested Change
A19	Comment	The Plan states that maps showing site boundaries are included alongside the policies. However, this is not the case. They are not included in the PDF version of the plan but on separate individual settlement policy maps. It would be helpful if site maps were included in the Plan itself next to the policy.	<i>Include maps in Plan itself next to policies</i>
Plan Objectives	Sound	We welcome the reference to the historic environment and landscapes in Objective 3.	
A31 and A34	Sound	We very much welcome the preparation of the Heritage Impact Assessments to inform the site selection process and site allocation policies.	
A31 and A35	Sound	We very much welcome the preparation of the LVAs to inform the site allocation policies.	
Evidence Base	Comment	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.	
Alburgh and Denton		No comments	
Alpington, Yelverton and Bergh Apton			
Policy VC ALP1 Site SN0400 West of Church Meadow, Alpington	Sound	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.	
Policy VC BAP1 Site SN0412REV Former Concrete Batching Plant, south of Church	Sound	We welcome the addition of the policy criterion in relation to listed buildings.	

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Road, Bergh Apton			
Aslacton, Great Moulton and Tibenham			
Policy VC ASL1 Site SN0459 Land off Church Road, Aslacton	Sound	Whilst there are no designated heritage assets within the site boundary, there is the 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 on the setting of the heritage asset.	
Policy VC GRE1 North of High Green, west of Heather Way	Sound	Whilst there are no designated heritage assets within the site boundary, there are two grade II listed buildings on High Green to the south of the site. Any development of the site has the potential to impact on the significance of these designated heritage assets. The site lies to the north of site VC GRE2 which has the benefit of planning consent for residential development. Assuming this permission is implemented, this site would form a logical extension. We welcome the second bullet point to minimise the visual impact and integrate the site into the landscape.	
Policy VC GRE2 Land north of High Green opposite White House Bungalow	Unsound	Whilst there are no designated heritage assets within the site boundary, there are two grade II listed buildings on High Green to the south of the site. Any development of the site has the potential to impact on the significance of these designated heritage assets. We note that this site has the benefit of planning permission. However, it is helpful that there are still policy criteria in this policy for any new planning permission. It would be helpful to add a heritage criterion to read, 'Development that preserves and enhances the significance of nearby listed buildings on High Green (including any contribution made to that significance by setting).'	<i>Add new criterion to read: 'Development that preserves and enhances the significance of nearby listed buildings on High Green (including any contribution made to that significance by setting).'</i>
Barford, Marlingford, Colton and Wrampingham			
VC BAR1	Unsound	Whilst there are no designated heritage assets within the site boundary, the	<i>Amend bullet point 5 to read:</i>

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Land at Cock Street and Watton Road		<p>grade II listed Sayers Farmhouse lies to the south west of the site. There are glimpsed views farmhouse from the site. Any development of the site has the potential to impact on the significance of this listed building.</p> <p>We welcome the completion of an HIA to consider the impact of development on this asset and the non-designated Cock Inn.</p> <p>We welcome the reference to Sayers Farm in bullet point 4 and the reference to heritage assets in bullet point 5.</p> <p>We recommend that Sayers Farmhouse should also be referenced in bullet point 5 in relation to layout and design. The bullet point would read:</p> <p>'...given to the setting of <u>Sayers Farmhouse</u> and The Cock Inn.'</p>	<p><i>'...given to the setting of <u>Sayers Farmhouse</u> and The Cock Inn.'</i></p>
Barnham Broom, Kimberley, Carleton Forehoe, Runhall and Brandon Parva			
Policy VC BB1 Corner of Norwich Road and Bell Road	-	No comments	
Bawburgh			
Policy VC BAW1 Land east of Stocks Hill	Unsound	<p>Whilst there are no designated heritage assets within this site, the site lies immediately to the south of the boundary of the Bawburgh Conservation 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>We welcome the preparation of an HIA for the site. The HIA makes several recommendations. These have been included in bullet point 2 and 4 which is welcomed.</p> <p>Bullet point 3 states that the HER should be consulted to determine the</p>	<p><i>Amend criterion 3 to read...</i></p> <p><i>'Planning applications should be supported by archaeological assessment including the results of field evaluation where appropriate.'</i></p>

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		<p>need for any archaeological surveys prior to development. However, this is different to the recommendation in the HIA which states that 'Require investigation on the proposed site prior to development commencing to identify and further historic activity'.</p> <p>In our view, some assessment is needed to inform any planning application.</p> <p>We therefore advise that bullet point 3 should be amended to read, 'Planning applications should be supported by archaeological assessment including the results of field evaluation where appropriate.'</p>	
<p>Bressingham</p> <p>Site: SN4036 - Land to the east of School Road</p>	Unsound	<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 asset through development within its setting.</p> <p>We welcome the preparation of an HIA for the site.</p> <p>Whilst we welcome the recommendation of the HIA to provide an area of open space to preserve views of the building and create a degree of separation, we note that this area is also now being proposed as an area of informal car parking.</p> <p>We have some concerns as to whether an area of open space to protect the setting of the listed building is compatible with the land also being used as a car park. We suggest that consideration should be given to locating the car park in another area of the site, or even off-site – for example it might be more appropriate to locate the car park on the same side of the road as the school to reduce the number of children crossing the road.</p> <p>If you are going to pursue the car park option on-site, we suggest the addition of wording to criterion 2 to read, 'Consideration should be given to the design of the car park to ensure that the grade II listed Pine Tree Cottage including its setting is conserved and enhanced.'</p> <p>Criterion 1 of the policy suggests that there should be frontage development</p>	<p><i>Consider carefully the most appropriate location for a carp park if required.</i></p> <p><i>Add the following at criterion 2 'Consideration should be given to the design of the car park to ensure that the grade II listed Pine Tree Cottage including its setting is conserved and enhanced.'</i></p> <p><i>Review criterion 1 in relation to frontage development in light of HIA comments.</i></p> <p><i>Amend criterion 4 to read 'Planning applications should be supported by archaeological assessment including the results of field evaluation where appropriate.'</i></p>

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		<p>and yet the HIA was specific about the need to set development back from the frontage. We suggest you review the wording of criterion 1 accordingly.</p> <p>We welcome criterion 3 and 5 of the policy.</p> <p>Bullet point 4 states that the HER should be consulted to determine the need for any archaeological surveys prior to development. However, this is different to the recommendation in the HIA which states that 'This site would need to be investigated prior to development'. In our view, some assessment is needed to inform any planning application.</p> <p>We therefore advise that bullet point 4 should be amended to read, 'Planning applications should be supported by archaeological assessment including the results of field evaluation where appropriate.'</p>	
Brooke, Kirstead and Howe			
Settlement Limit Amendment Site SN0020SL Land east of High Green and north of The Mallows Walk	Unsound	<p>Although this is not an allocated site in the Local Plan, the settlement limit is being amended to incorporate this land.</p> <p>The land lies within the Brooke Conservation Area and just to the south of The Warren (grade II listed). Any development of the land has the potential to impact on the significance of these designated heritage assets.</p> <p>There does not appear to be an HIA for this site. We recommend the preparation of an HIA for this site ahead of the EiP.</p> <p>Notwithstanding this, we have some reservations about the approach to the extension of settlement limits because it is unclear how site-specific policy requirements e.g. mitigation measures recommended in an HIA, can be secured in the absence of a site-specific policy.</p>	<i>Prepare an HIA</i>
Policy VC BRO1 Site: SN0432REVA, East and West of the B1332 Norwich Road	Unsound	<p>Although there are no designated heritage assets on site, the site lies to the 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><i>Update the HIA to include the land to the west of the road.</i></p> <p><i>Amend criterion 9 to read 'Planning applications should be supported by archaeological</i></p>

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		<p>We welcome the preparation of an HIA for the site. However, the HIA only covers the eastern portion of the site and does not consider the land to the west of the road, the development of which is likely to have a greater impact on the setting of Brooke Lodge. We recommend that the HIA is updated to reflect this. The recommendations from the revised HIA should be used to inform the policy wording.</p> <p>That said, the extensive landscaping between the proposed site and the listed Lodge would limit the impact of development on the historic environment.</p> <p>Bullet point 9 states that the HER should be consulted to determine the need for any archaeological surveys prior to development. In our view, some assessment is needed to inform any planning application. We therefore advise that bullet point 9 should be amended to read, 'Planning applications should be supported by archaeological assessment including the results of field evaluation where appropriate.'</p>	<p><i>assessment including the results of field evaluation where appropriate.'</i></p>
Bunwell			
Policy VC BUN 1 Site: SN0537, Land to the north of Bunwell Street	Sound	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.	
Policy VC BUN2 Land opposite Lilac Farm, Bunwell Street	Unsound	<p>There are no designated heritage assets within the site boundary. However, Lilac Farmhouse (grade II listed) lies opposite the site, and Bunwell Manor Hotel and The Cottage, also grade II listed, lie to the north of the site. Any development of the site has the potential to impact on the significance of these designated heritage assets.</p> <p>We welcome the preparation of an HIA for the site. The HIA makes a number of helpful recommendations for the site. Some of these have been included in the policy (bullet points 1 and 2) but not all.</p> <p>In bullet point 1 it would be helpful to make clear that the views should link Lilac Farmhouse (grade II) to the open countryside. The HIA also advises development should be set back from the road frontage to retain an open setting. Add criterion to state this.</p>	<p>Amend bullet point 1 to make it clear that the views should link Lilac Farmhouse (grade II) to the open countryside.</p> <p>Add criterion to state that development should be set back from the road frontage to retain an open setting.</p> <p>Bullet point 2 would be reworded to also reference Bunwell Manor Hotel.</p>

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		Bullet point 2 would be reworded to also reference Bunwell Manor Hotel.	
Burston, Shimpling and Gissing	-	To be considered as part of the Diss and District Neighbourhood Plan	
Carleton Rode			
Policy VC CAR1 Land west of Rode Lane	Unsound	<p>Whilst there are no designated heritage assets within the site boundary there are two grade II listed buildings (Flaxlands Farmhouse and The Plough Inn) on the opposite side of the road. Any development of the site has the potential to impact on the significance of these designated heritage assets.</p> <p>We appreciate that this site was allocated in the previous local plan and indeed has an existing planning permission.</p> <p>We welcome the reference in the policy criteria to Flaxlands Farmhouse, but the policy should also mention the Plough Inn (also grade II listed).</p>	<i>Add reference to the Plough Inn in the second bullet point.</i>
Dickleburgh		To be considered as part of the Dickleburgh Neighbourhood Plan	
Ditchingham, Broome, Hedenham and Thwaite			
Policy VC DIT1 Site: SN0373, Land between Thwaite Road and Tunneys Lane	-	No comments	
Earsham			
Policy VC EAR1 SN0390, Land east of School Road	Unsound	<p>There are no designated heritage assets on site. The Close, listed at grade II, lies to the south of the site. The grade I listed All Saints Church lies to the north 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 assets.</p> <p>We welcome the preparation of the HIA. The HIA makes a number of helpful recommendations in relation to site density and views of the church.</p>	<p><i>Amend bullet point 1 to reference lower density on eastern part of site and views of the church.</i></p> <p><i>Amend criterion 4 to read 'Planning applications should be supported by archaeological assessment including the results</i></p>

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		<p>We broadly welcome bullet points 1,2 and 4 of the policy but consider that bullet point 1 could be more specific in relation to density on the eastern part of the site and views of the church.</p> <p>Bullet point 4 states that the HER should be consulted to determine the need for any archaeological surveys prior to development. In our view, some assessment is needed to inform any planning application. We therefore advise that bullet point 4 should be amended to read, 'Planning applications should be supported by archaeological assessment including the results of field evaluation where appropriate.'</p>	<i>of field evaluation where appropriate.'</i>
Forncett St Mary and Forncett St Peter			
Gillingham, Geldeston, and Stockton			
Policy VC GIL1 Site: SN0478 South of Geldeston Road and Daisy Way	-	No comments	
Policy VC GEL1 Site: SN0437, Land off Kells Way, Geldeston	Unsound	<p>There are no designated heritage assets on site. However, the site is adjacent to the Gedlestone 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.</p> <p>We welcome the preparation of the HIA. The HIA recommends that development needs to respect the form and layout of the Kells Estate. This is reflected in criterion 2.</p> <p>Bullet point 4 states that the HER should be consulted to determine the need for any archaeological surveys prior to development. In our view, some assessment is needed to inform any planning application. We therefore advise that bullet point 4 should be amended to read, 'Planning applications should be supported by archaeological assessment</p>	<i>Amend criterion 4 to read 'Planning applications should be supported by archaeological assessment including the results of field evaluation where appropriate.'</i>

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		including the results of field evaluation where appropriate.'	
Hales and Heckingham, Langley with Hardley, Carleton St Peter, Claxton, Raveningham and Sisland			
Policy VC HAL1 Site: Part of SN0308, Land off Briar Lane, Hales	Unsound	<p>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 significance) of this heritage asset.</p> <p>We welcome the preparation of the HIA and revised HIA for the enlarged site.</p> <p>We have some concerns for the north eastern portion of the site. We welcome the reference in paragraph 17.16 of the supporting text to views and heights and layout. However, this should be incorporated into the policy itself.</p> <p>The policy should be amended to include a new criterion to read,</p> <p><i>Protect views of the grade II listed Hales Hospital from Briar Lane, careful layout, design and landscaping, including 1 and 1.5 storey dwellings in the north east of the site to protect and enhance the listed building as recommended in the HIA.</i></p> <p>Bullet point 5 states that the HER should be consulted to determine the need for any archaeological surveys prior to development. In our view, some assessment is needed to inform any planning application. We therefore advise that bullet point 5 should be amended to read, 'Planning applications should be supported by archaeological assessment including the results of field evaluation where appropriate.'</p>	<p><i>Add criterion to read</i></p> <p><i>Protect views of the grade II listed Hales Hospital from Briar Lane, careful layout, design and landscaping, including 1 and 1.5 storey dwellings in the north east of the site to protect and enhance the listed building as recommended in the HIA.</i></p> <p><i>Amend criterion 5 to read 'Planning applications should be supported by archaeological assessment including the results of field evaluation where appropriate.'</i></p>
Policy VC HAL2	Unsound	Whilst there are no designated heritage assets on the site, the former Hales	<i>Add criterion to read</i>

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Land at Yarmouth Road west of Hales Hospital		<p>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 significance) of this heritage asset.</p> <p>We welcome the preparation of the HIA and revised HIA for the enlarged site.</p> <p>We appreciate that this site was allocated in the previous local plan and also has the benefit of planning permission and that development has commenced.</p> <p>Reference should be made to the nearby listed Hales Hospital with the addition of a criterion to read: <i>'Protect and enhance the grade II listed Hales Hospital through careful layout, design and landscaping'.</i></p> <p>Bullet point 4 states that the HER should be consulted to determine the need for any archaeological surveys prior to development. In our view, some assessment is needed to inform any planning application. We therefore advise that bullet point 4 should be amended to read, 'Planning applications should be supported by archaeological assessment including the results of field evaluation where appropriate.'</p>	<p><i>'Protect and enhance the grade II listed Hales Hospital through careful layout, design and landscaping'.</i></p> <p><i>Amend criterion 4 to read 'Planning applications should be supported by archaeological assessment including the results of field evaluation where appropriate.'</i></p>
Hempnall, Topcroft Street, Morningthorpe, Fritton, Shelton and Hardwick			
Policy VC HEM1 Site: SN0220SL, Land at Millfields, Hempnall	Unsound	<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>We welcome the preparation of the HIA. The HIA makes a number of helpful recommendations. We welcome the references to the HIA and recommendations in paragraph 18.15 and also in bullet points 1 and 2 of the policy.</p>	<p><i>Add criterion to read: 'Careful layout and design to keep views open, retain visual prominence of windmill and incorporate views of windmill from public spaces'.</i></p> <p><i>Amend criterion 6 to read 'Planning applications should be supported by archaeological</i></p>

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		<p>However, not all of the recommendations are reflected in the policy. Therefore, we suggest the addition of a bullet point to read: <i>'Careful layout and design to keep views open, retain visual prominence of windmill and incorporate views of windmill from public spaces'</i>.</p> <p>Bullet point 6 states that the HER should be consulted to determine the need for any archaeological surveys prior to development. In our view, some assessment is needed to inform any planning application. We therefore advise that bullet point 6 should be amended to read, <i>'Planning applications should be supported by archaeological assessment including the results of field evaluation where appropriate.'</i></p>	<i>assessment including the results of field evaluation where appropriate.'</i>
Heywood	-	No comments	
Keswick and Intwood	-	No comments	
Ketteringham	-	No comments	
Kirby Cane and Ellingham			
Policy VC ELL1 Site: SN0305, Land South of Mill Road, Ellingham	Sound	We welcome the references to the Conservation Area and Church in bullet point 3.	
Policy VC ELL2 Site: SN3018, Land at Florence Way, Ellingham	-	No comments	
Little Melton and Great Melton			
Policy VC LM1 Land south of School Lane and east of Burnthouse Lane, Little Melton	Unsound	<p>The grade II listed barn at Elm Farm lies within the site. Therefore, any development of this site has the potential to impact upon the significance of this heritage asset.</p> <p>We welcome the preparation of the HIA.</p> <p>The HIA makes a number of helpful recommendations in relation to the barn. We welcome the references in paragraph 23.8 and in bullet points 4, 5 and 6 of the policy which reflect these recommendations. It is clearly</p>	<p><i>Explore opportunities to access the far part of the site by alternative means (not across the open area to protect the setting of the barn). Amend policy wording accordingly.</i></p> <p><i>Amend criterion 7 to read 'Planning applications should be</i></p>

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		<p>important for this land to remain open and we welcome that being reflected in policy.</p> <p>We do have some concerns about the possibility of one part of the site being accessed across this open land by the barn. Any access road is likely to also include lighting etc and would harm the significance of the listed barn through development within its setting. It would be preferable for that part of the site to be accessed either through the development that is currently being built, or alternatively directly off Burnthouse Lane. We recommend that alternative access options be explored, and the policy wording amended accordingly to reduce harm to the listed building.</p> <p>Bullet point 7 states that the HER should be consulted to determine the need for any archaeological surveys prior to development. In our view, some assessment is needed to inform any planning application. We therefore advise that bullet point 7 should be amended to read, 'Planning applications should be supported by archaeological assessment including the results of field evaluation where appropriate.'</p>	<p><i>supported by archaeological assessment including the results of field evaluation where appropriate.'</i></p>
Morley and Deopham	-	No comments	
Mulbarton, Bracon Ash, Swardeston and East Carleton			
Policy VC MUL1 Land east of Bluebell Road and north of The Rosery	-	No comments	
Policy VC SWA1 Site: SN0204, Land off Bobbins Way, Swardeston	-	No comments	
Policy VC SWA2 Land on Main Road Swardeston	Unsound	Bullet point 3 states that the HER should be consulted to determine the need for any archaeological surveys prior to development. In our view, some assessment is needed to inform any planning application.	<p><i>Amend criterion 3 to read 'Planning applications should be supported by archaeological</i></p>

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		We therefore advise that bullet point 3 should be amended to read, 'Planning applications should be supported by archaeological assessment including the results of field evaluation where appropriate.'	<i>assessment including the results of field evaluation where appropriate.'</i>
Policy VC BRA1 Land at Norwich Road	Unsound	<p>Whilst there are no designated heritage assets on the site, there is a grade II listed Thatched Cottage to the north east of the site and the Bracon Ash and Hethel War Memorial to the north of the site. Home Farmhouse, also listed at grade II, lies 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>We appreciate that this site was allocated in the previous local plan and that an application for the site has been submitted, pending determination.</p> <p>We welcome the reference to Home Farm and Thatched cottage and their settings in bullet point 2.</p> <p>Bullet point 4 states that the HER should be consulted to determine the need for any archaeological surveys prior to development. In our view, some assessment is needed to inform any planning application. We therefore advise that bullet point 4 should be amended to read, 'Planning applications should be supported by archaeological assessment including the results of field evaluation where appropriate.'</p>	<i>Amend criterion 4 to read 'Planning applications should be supported by archaeological assessment including the results of field evaluation where appropriate.'</i>
Needham, Brockdish, Starston and Wortwell			
Policy VC NEE1 Land north of High Road and east of Harmans Lane	Unsound	<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>The site 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>Amend criterion 4 to read 'Planning applications should be supported by archaeological assessment including the results of field evaluation where appropriate.'</i>

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		<p>We welcome the preparation of the HIA. Although there are views along the road of the church from in front of the site, the site itself is set back. We welcome the reference to appropriate boundary treatments in the supporting text and policy.</p> <p>Bullet point 4 states that the HER should be consulted to determine the need for any archaeological surveys prior to development. In our view, some assessment is needed to inform any planning application. We therefore advise that bullet point 4 should be amended to read, 'Planning applications should be supported by archaeological assessment including the results of field evaluation where appropriate.'</p>	
Settlement Limit Amendment Site SN5045SL Land north of Wortwell United Reform Church and West of High Road	Unsound	<p>Although this is not an allocated site in the Local Plan, the settlement limit is being amended to incorporate this land.</p> <p>Although the land does not include any designated heritage assets, the site is located between two grade II listed buildings – the United Reform Church and 155 High Road. Therefore, any development of this site has the potential to impact upon the significance of these heritage assets.</p> <p>There does not appear to be an HIA for this site. We recommend the preparation of an HIA for this site ahead of the EiP.</p> <p>Notwithstanding this, we have some reservations about the approach to the extension of settlement limits because it is unclear how site-specific policy requirements e.g. mitigation measures recommended in an HIA, can be secured in the absence of a site-specific policy.</p>	<i>Prepare HIA</i>
Policy VC WOR 1 North and South of High Road	Unsound	<p>Whilst there are no designated heritage assets within the site boundary, Redenhall church (grade I listed) is very visible from the northern part of the site.</p> <p>We welcome the reference to the GI listed St Mary's church, Redenhall in paragraph 26.23 and the reference to design and layout including building heights to the reflect the prominence of the site in the River Valley Landscape. We also welcome bullet point 4 of the policy.</p> <p>We recommend an HIA is prepared for this site to fully assess the impact and ensure the appropriate mitigation is in place within the policy.</p>	<i>Prepare HIA and amend policy, if necessary, with appropriate mitigation measures.</i>

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Policy VC WOR 2 Site: SN2036, Land at the junction of High Road and Low Road, Wortwell	Unsound	<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>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> <p>We welcome the preparation of the HIA. The HIA includes a number of helpful recommendations. Bullet point 3 of the policy reflects the recommendation in relation to historic grain.</p> <p>The policy should also include a criterion reflecting the HIA recommendation in relation to landscaping to read,</p> <p><i>'Enhance landscaping along the west boundary, particularly behind the village green'</i></p> <p>Bullet point 2 states that the HER should be consulted to determine the need for any archaeological surveys prior to development. In our view, some assessment is needed to inform any planning application. We therefore advise that bullet point 2 should be amended to read, 'Planning applications should be supported by archaeological assessment including the results of field evaluation where appropriate.'</p>	<p><i>Add criterion to read</i></p> <p><i>'Enhance landscaping along the west boundary, particularly behind the village green'</i></p> <p><i>Amend criterion 2 to read</i></p> <p><i>'Planning applications should be supported by archaeological assessment including the results of field evaluation where appropriate.'</i></p>
Newton Flotman and Swainsthorpe			
Policy VC NEW1 Site: SN4024, Land off Alan Avenue, Newton Flotman	-	No comments	
Policy VC NEW2 Land adjacent Alan Avenue	-	No comments	

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Pulham Market and Pulham St Mary			
Policy VC PSM1 Site: SN1052REV, Land north of Norwich Road and west of Poppy's Lane, 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			
Policy VC ROC1 Site: SN2007, Land south of New Inn Hill, Rockland St Mary & (Part of) SN0531, Land west of Lower Road, Rockland St Mary	Unsound	<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 on the western end of the site.</p> <p>We welcome the preparation of the HIA.</p> <p>However, we disagree that the impacts Old Hall Barn and Farmhouse will be negligible. The collection of farm buildings has a relationship to the wider landscape. There needs to be a degree of set back and open space in the far western portion of the site to reduce the impact on these listed buildings. This should be added as a new policy criterion.</p> <p>The HIA also suggests that the footpath link near the barn would need to consider the relationship to the barn and use appropriate materials. This should be included in the policy at criterion 4 to read <i>'Careful consideration should be given to the relationship of the footpath to the listed barn and appropriate materials used'</i>.</p> <p>Bullet point 5 states that the HER should be consulted to determine the need for any archaeological surveys prior to development. In our view, some assessment is needed to inform any planning application.</p>	<p><i>Add wording to criterion 4 to read 'Careful consideration should be given to the relationship of the footpath to the listed barn and appropriate materials used'.</i></p> <p><i>Add new criterion to read: 'The most western part of the site should be left open to protect and enhance the setting of the listed buildings.'</i></p> <p><i>Amend criterion 5 to read 'Planning applications should be supported by archaeological assessment including the results of field evaluation where appropriate.'</i></p>

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		We therefore advise that bullet point 5 should be amended to read, 'Planning applications should be supported by archaeological assessment including the results of field evaluation where appropriate.'	
Policy VC ROC2 Site: SN2064REV, Land to the south of The Street, Rockland St Mary	Unsound	We welcome the preparation of the HIA. The site should include criterion in relation to archaeology given the presence of finds within the site as identified in the HIA.	<i>Add criterion in relation to archaeology.</i>
Roydon	-	To be considered as part of the Diss and District Neighbourhood Plan	
Saxlingham Nethergate	-	No comments	
Scole	-	To be considered as part of the Diss and District Neighbourhood Plan	
Seething and Mundham			
Policy VC SEE1 Site: SN2148, Land to the west of Mill Lane, Seething	-	No comments	
Settlement Limit Amendment West of Seething Road to include sites SN406SL, SN587SL, and SN0588SL	Unsound	Part of this land lies within the Seething Conservation Area or adjacent to the Conservation Area. There are two grade II listed buildings opposite. Therefore, any development of these sites has the potential to impact upon the significance of these heritage assets. We note that HIAs have been completed for two of these sites which identified moderate impacts on the historic environment. A number of helpful mitigation measures were proposed in the HIAs but it is not clear how these recommendations will be carried forward into the Plan as there is no policy for the settlement limit amendments. We therefore have concerns that the potential impacts on the historic environment will not be properly addressed. Finally, we suggest that an HIA should be prepared for site SN0588SL. Notwithstanding this, we have some reservations about the approach to the	<i>Prepare an HIA for SN0588SL.</i>

Section	Sound/ Unsound	Comments	Suggested Change
		extension of settlement limits because it is unclear how site-specific policy requirements e.g. mitigation measures recommended in an HIA, can be secured in the absence of a site-specific policy.	
Spooner Row and Suton			
Policy VC SP01 Site: SN0444, Land west of Bunwell Road, Spooner Row	Unsound	<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>We welcome the preparation of the HIA. We welcome paragraph 34.8 and the second bullet point of the policy in relation to strengthening boundary vegetation.</p> <p>Bullet point 5 states that the HER should be consulted to determine the need for any archaeological surveys prior to development. In our view, some assessment is needed to inform any planning application. We therefore advise that bullet point 5 should be amended to read, 'Planning applications should be supported by archaeological assessment including the results of field evaluation where appropriate.'</p>	<i>Amend criterion 5 to read 'Planning applications should be supported by archaeological assessment including the results of field evaluation where appropriate.'</i>
Policy VC SPO2 Site: SN0567, Land south of Station Road and west of Queensland, Spooner Row	-	No comments	
VC SPO3 Land at School Lane, Spooner Row	-	No comments	
VC SPO4 Land at Chapel Road	-	No comments	
Stoke Holy			

Section	Sound/ Unsound	Comments	Suggested Change
Cross, Shotesham and Caistor St Edmund & Bixley			
VC STO1 Site: SN0202, Land north of and adjoining Long Lane, Stoke Holy Cross	-	No comments	
Surlingham, Bramerton and Kirby Bedon	-	No comments	
Tacolneston and Fornsett End			
VC TAC1 Site: (Part of) SN1057, Land to the west of Norwich Road	-	No comments	
VC TAC2 Land adjacent the Fields	Unsound	Bullet point 6 states that the HER should be consulted to determine the need for any archaeological surveys prior to development. In our view, some assessment is needed to inform any planning application. We therefore advise that bullet point 6 should be amended to read, 'Planning applications should be supported by archaeological assessment including the results of field evaluation where appropriate.'	<i>Amend criterion 6 to read 'Planning applications should be supported by archaeological assessment including the results of field evaluation where appropriate.'</i>
Tasburgh			
Site: SN4079, Land north of Church Road and west of Tasburgh School	Unsound	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. Therefore, any development of this site has the potential to impact upon the significance of these heritage assets. We are particularly concerned about	<i>The policy should be amended to include this area of open space/orchard/playing field in the north eastern third of the site to protect and enhance the setting of Old Hall Farmhouse. The capacity of the site should be reduced accordingly.</i>

Section	Sound/ Unsound	Comments	Suggested Change
		<p>the potential impacts on the Farmhouse, given its proximity.</p> <p>We do however appreciate this is seeking to increase the density of an existing allocation.</p> <p>We welcome the preparation of the HIA. However, we disagree with some of the HIA findings. It is our view that the setting of the Old Hall Farmhouse would be affected by development across the whole site.</p> <p>We would like to see approximately one third (the northeast) of the site left as orchard or, potentially a playing field extension for the school, but with no built development. Housing development should be contained within the south eastern two thirds of the site to reduce harm to the significance of the listed building by development within its setting.</p> <p>This may have an impact on the capacity of the site and it may not be possible to accommodate 25 dwellings on the site at a density in keeping with the surrounding character of the village.</p> <p>The policy should be amended to include this area of open space/orchard/playing field in the north eastern third of the site to protect and enhance the setting of Old Hall Farmhouse. The capacity of the site should be reduced accordingly.</p> <p>Bullet point 4 states that the HER should be consulted to determine the need for any archaeological surveys prior to development. In our view, some assessment is needed to inform any planning application. We therefore advise that bullet point 4 should be amended to read, 'Planning applications should be supported by archaeological assessment including the results of field evaluation where appropriate.'</p>	<p><i>Amend criterion 4 to read 'Planning applications should be supported by archaeological assessment including the results of field evaluation where appropriate.'</i></p>
Tharston, Hapton and Flordon	-	No comments	
Thurlton and Norton Subcourse			

Section	Sound/ Unsound	Comments	Suggested Change
VC THU1 Land north of Blacksmiths Gardens	Unsound	<p>Whilst there are no designated heritage assets within the site boundary, the grade I listed All Saints Church lies to the north of the site. Therefore, any development of this site has the potential to impact upon the significance of this heritage asset. However, the church is at some considerable distance and there is substantial planting between the church and the site and therefore we do not consider it likely to have an impact on the heritage asset.</p> <p>Bullet point 3 states that the HER should be consulted to determine the need for any archaeological surveys prior to development. In our view, some assessment is needed to inform any planning application. We therefore advise that bullet point 3 should be amended to read, 'Planning applications should be supported by archaeological assessment including the results of field evaluation where appropriate.'</p>	<i>Amend criterion 3 to read 'Planning applications should be supported by archaeological assessment including the results of field evaluation where appropriate.'</i>
VC THU2 Site: SN0149, Land adjacent to Holly Cottage, west of Beccles Road, Thurlton	-	No comments	
Thurton and Ashby St Mary	-	No comments	
Tivetshall St Mary and Tivetshall St Margaret			
VC TIV1 Site: SN0319, Pear Tree Farm, West of The Street, Tivetshall St Margaret	-	No comments	
Settlement Limit Amendment Site: SN3002SL, Land south of	Sound	<p>Although this is not an allocated site in the Local Plan, the settlement limit is being amended to incorporate this land.</p> <p>There are no designated heritage assets on the site. There are two grade</p>	

Section	Sound/ Unsound	Comments	Suggested Change
Green Pastures, west of The Street, Tivetshall St Margaret		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. We welcome the preparation of the HIA. The HIA identifies the impact as neutral and does not recommend mitigation.	
Toft Monks, Aldeby, Haddiscoe, Wheatacre and Burgh St Peter			
Policy VC HAD1 Site: (Part of) SN0414, Land south of Haddiscoe Manor Farm	Unsound	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. We welcome the preparation of the HIA. We welcome the proposal to locate the development further south, leaving an area of open land at the northern end of the site closest to the A143 to protect the setting of the church. We particularly welcome criterion 6 and 7 of the policy. Bullet point 8 states that the HER should be consulted to determine the need for any archaeological surveys prior to development. In our view, some assessment is needed to inform any planning application. We therefore advise that bullet point 8 should be amended to read, 'Planning applications should be supported by archaeological assessment including the results of field evaluation where appropriate.'	<i>Amend criterion 8 to read 'Planning applications should be supported by archaeological assessment including the results of field evaluation where appropriate.'</i>
Policy VC BUR1 Site: SN4017, Land north of Staithe Road, Burgh St Peter	-	No comments	
Wacton	-	No comments	
Wicklewood			

Section	Sound/ Unsound	Comments	Suggested Change
Policy VC WIC1 Site: SN0577REVA and REVB, Land to the south of Wicklewood Primary School	-	No comments	
Policy VC WIC2 Site: SN4045SL, Land off Hackford Road	Unsound	<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>We welcome the preparation of the HIA. We welcome bullet points 1 and 2 of the policy. We suggest the addition of and words, 'and enhance' after conserve in the first bullet point to read: 'to conserve <u>and enhance</u> the immediate setting...' to more closely reflect the NPPF.</p>	<i>In first bullet point add, 'to conserve <u>and enhance</u> the immediate setting...'</i>
Policy VC WIC3 Land at Hackford Road	Unsound	<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 south of the site. The grade II listed Old Mill House lies 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>There is a degree of separation of the site from the church.</p> <p>We do appreciate that this is an existing allocation and it has a planning application pending determination.</p> <p>We welcome the second bullet point relating to the landscaping and the church and its setting and suggest the addition of the words conserve and enhance to more closely reflect the NPPF.</p>	<i>In second bullet point, add <u>Visual impact on and to conserve and enhance St Andrew and All Saints Church and its setting</u></i>
Winfarthing and Shelfanger			
Policy VC WIN1	-	No comments	

Section	Sound/ Unsound	Comments	Suggested Change
Site: SN4050, Land to the west of Hall Road, Winfarthing			
Policy VC WIN2 Site: SN4055, Land off The Street, Winfarthing	Unsound	<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>We welcome the preparation of the HIA. The HIA makes a number of helpful recommendations, some of which are incorporated into bullet point 1 of the Policy. We suggest the addition of a bullet point to capture the second recommendation of the HIA to read: 'Consideration of the local vernacular and distinctiveness especially materials, with reference to the CA Appraisal.'</p>	<i>Add bullet point to read, 'Consideration of the local vernacular and distinctiveness especially materials, with reference to the CA Appraisal.'</i>
Woodton and Bedingham			
Site: SN0262, Land south of Church Road, Woodton	Sound	<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>We appreciate that the allocation has been moved away from these heritage assets which is welcomed.</p>	.
Wreningham Ashwellthorpe and Fundenhall			
Policy VC ASH1 Site: SN0017SL - Land to the west of New Road, Ashwellthorpe & SN0242 - Land to the west of New	-	No comments	

Section	Sound/ Unsound	Comments	Suggested Change
Road, Ashwellthorpe			
Monitoring	Comment	We continue to 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 Appraisal	Comment	<p>We are concerned at the over-reliance of GIS distance-based analysis for the Sustainability Appraisal (paras 5.3.7 – 5.3.10). The report itself comments of the limitations of this and states that it is not technically appraisal. And little or no potential to reach conclusions on significant effects. The report uses the example of biodiversity features. The same issue applies for heritage assets.</p> <p>We do however welcome the preparation of Heritage Impact Assessments (noted at para 5.3.18)</p> <p>The analysis at section 9.8 seems to pick up on the findings of the HIAs and also the inclusion of many of those recommendations in the supporting text or policies of the Plan which is welcomed.</p> <p>In future SA reports, please ensure the correct notation is used for listed buildings e.g. grade1 should be grade I, grade 2 should be grade II.</p> <p>The findings of the Analysis on pages 69-95, further highlights our concern that some of the analysis has been overly focused on distance.</p> <p>We note that Scheduled monuments do not appear in Table A.</p>	