



Norfolk County Council

Norfolk Minerals and Waste Local Plan

MIN 25 – land at Manor Farm, Haddiscoe

**Heritage Impact Assessment including
Archaeological Desk-Based Assessment**



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1. Introduction

1.1 What is the purpose of a heritage impact assessment?

The National Planning Policy Framework 2023 (NPPF) Glossary defines heritage assets as being “a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest”. All heritage assets have a significance, and it is the purpose of a heritage impact assessment to explore the significance of the identified heritage assets in order to understand what impact new development may have on them. In accordance with paragraph 199 of the NPPF great weight is to be given to the conservation of a heritage asset, noting that the more important the asset the greater the weight that should be afforded to its conservation. Any harm or loss to a designated heritage asset (including its setting) requires clear and convincing justification, and in some cases should only occur in wholly exceptional circumstances.

The setting of a heritage asset can contribute to its significance. Where appropriate consideration must be given to the setting of the identified heritage asset and how this influences our understanding of its importance. The relationship between heritage assets can also impact on our understanding of the past and therefore can play an important role in their significance. The setting of a designated heritage asset is not purely visual; noise, dust and vibration during active mineral extraction can also affect the setting of a designated heritage asset.

Therefore, the purpose of the heritage impact assessment is to:

- identify key heritage assets and settings that may be affected by potential mineral extraction site MIN 25 considered for inclusion within the Norfolk Minerals and Waste Local Plan;
- understand the significance of the heritage asset, including the features that contribute to its significance;
- explore the impact of development on the significance of the heritage asset and/or the setting;
- consider possible mitigation measures or enhancement opportunities that may arise from the proposed development; and
- determine the impact new development would have on the heritage asset with mitigation measures in place.

1.2 Standards and Guidance

The following standards and guidance documents have been adhered to:

- Historic England, Mineral Extraction and Archaeology (Historic England, 2020)
- Norfolk County Council, Standards for development Led Archaeology in Norfolk (Robertson et al , 2018)
- Historic England, The Historic Environment and Site Allocations in Local Plans (Historic England, 2015a)
- Historic England, Managing Significance in Decision-Taking in the Historic Environment (Historic England 2015b)
- Historic England, The Setting of Heritage Assets (Historic England 2017)

1.3 Significance of Heritage Assets

Identification of the significance value of heritage assets can be a value judgement. The following categories have been used to assess the significance of heritage assets:

High – Heritage assets of international or national significance and/or of extraordinary merit. This can include Grade I and Grade II* listed buildings and Scheduled Ancient Monuments.

Medium – Heritage assets that are considered important at a national or regional level due to their special interest. This can include Grade II listed buildings and Conservation Areas.

Lesser – Locally important heritage assets, including historic townscapes (outside of Conservation Areas).

Negligible – Heritage assets of limited local importance with little special interest.

Unknown – The importance of the heritage asset has not been determined.

1.4 Levels of Impact

Following categorization of significance, the potential levels of impact of the proposed development on the heritage asset has also been considered and has been determined as falling into one of the categories listed below. Impacts could be either positive or negative and this is reflected in the individual assessments

Major Adverse – complete destruction/removal of the heritage asset, e.g., removal of below-ground archaeological remains by mineral extraction

Minor Adverse – A change adversely affecting the significance of a heritage asset, e.g., a minor visual change to the setting of a listed building

Neutral – The proposed mineral extraction and associated activities have no effect on the heritage assets.

Minor Beneficial – The proposed mineral extraction contributes positively to the significance of a heritage asset e.g., an area containing below-ground archaeological remains adjacent to mineral extraction is removed from cultivation and preserved under grassland.

Major Beneficial - The proposed mineral extraction significantly enhances the significance of a heritage asset e.g., removal of industrial buildings/plant from the setting of a heritage asset.

1.5 Mitigation and Levels of Harm

Levels of impact are then reconsidered in the light of proposed or existing mitigation/enhancement measures.

A final review of the findings determines the level of harm on the identified heritage asset:

Substantial Harm

Less Than Substantial Harm

Neutral

Less Than Substantial Positive

Substantial Positive

1.6 Site Details

Site Name: land at Manor Farm (between Loddon Road and Thorpe Road), Haddiscoe

Minerals and Waste Plan site allocation reference: MIN 25

National Grid Reference: TM 4390 9731

Area: c. 22 ha

Estimated mineral resource: 1.3 million tonnes of sand and gravel

Estimated extraction rate: 150,000 tonnes per annum over 11 years

Proposed restoration scheme: Restoration to a combination of acid grassland, woodland planting and shallow wetland/pond.

NCCES Consultation Number: CNF41405

1.7 Planning History

Between 2008 and 2011 a series of applications relating to mineral extraction were made in relation to the land at Manor Farm, Haddiscoe including an additional area of land south of the B1136 Loddon Road:

Planning Application Reference C/7/2008/7004

Application type: [EIA screening and scoping opinion request \(Earsham Gravels Ltd\)](#)

Proposal: Sand and gravel extraction / inert waste recycling with use of recycling residuals and imported waste materials to assist in restoration

Status: Screening Environmental Statement Required

Decision date: 19/03/2008

Planning Application Reference C/7/2010/7012

Application type: [EIA screening and scoping opinion request \(Earsham Gravels Ltd\)](#)

Proposal: Proposed extraction of sand and gravel with processing of aggregates and concrete batching

Status: Screening Environmental Statement Required

Decision date: 10/06/2010

Planning Application Reference C/7/2011/7020

Application type: [Full application \(Earsham Gravels Ltd\)](#)

Proposal: Extraction, processing, bagging and sale of sand and gravel with concrete batching and erection of solar panels within plant site void.

Status: Application refused

Decision date: 19/02/2013

Planning Appeal Reference APP/X2600/A/13/2197841

Application type: Appeal against a refusal to grant planning permission (Earsham Gravels Ltd)

Status: Appeal Refused - [Appeal Decision](#)

Decision date: 04/06/2014

The 2011 application included an area south of the B1136 Loddon Road, west of St Mary's Church. More recently a new planning application has been made excluding this area:

Planning Application Reference FUL/2022/0056

Application type: [Full application \(Breedon Trading Ltd\)](#)

Proposal: Extraction of sand and gravel with low level restoration to meadow species rich grassland with an ephemeral water body

Status: Undecided (as at September 2023)

The Norfolk Minerals and Waste Local Plan (NM&WLP) is planning for the quantum of mineral required in Norfolk for a Plan Period to the end of 2038. To meet the forecast need for sand and gravel the allocation of specific sites will be required. The specific site allocation MIN 25 was proposed by Breedon Group in response to a 'call for sites' in 2017. A number of other sites were also proposed by various mineral operators and landowners across the county. Following two rounds of consultation including with statutory consultees and assessment of the sites by planning officers it has been concluded that MIN 25 is one of the sites that is suitable for allocation in the NM&WLP when considered against the reasonable alternatives. The site allocation is for 1.3 million tonnes of sand and gravel which would be extracted in 9 years based on the 150,000 tonnes estimated annual extraction rate. The current planning application is for a lesser tonnage to be extracted, as it is not proposed for the sand to be removed from the site.

The Publication version of the Norfolk Minerals and Waste Local Plan (NM&WLP) (2022) contains the following assessment of the historic environment for site MIN 25:

M25.3 Historic environment: The historic landscape character of the site is Twentieth Century agriculture with boundary loss and agriculture with 18th to 19th Century piecemeal enclosure. The site is within a wider historic landscape character of 20th century agriculture with enclosure, boundary loss and boundary loss with a relict element; agriculture with 18th to 19th century piecemeal enclosure and modern built-up areas of small farm clusters and residential development. The wider historic landscape character also includes enclosed drained rectilinear grazing marsh (17th to 20th century enclosure), enclosed wetland meadow, mineral extraction, and woodland (carr woodland, regenerated alder carr woodland and 18th to 20th century plantation woodland).

M25.4 There are four Listed Building within 250m of the site; they are Grade II White House Farm (70m away), Grade I Church of St Mary (110m away), Grade II Monument to William Salter set in the churchyard wall (130m away) and Grade II Haddiscoe War Memorial (110m away). There are 13 Listed Buildings within 2km of the site. There are mature screen planting forming hedgerows on all sides of the site, except a section of the eastern boundary closest to Manor Farm; which is the landowner's property. The site is separated from the Church of St Mary by the B1136, Loddon Road, and the screen planting along the road. Views of the church from the road would not be affected by the mineral extraction. The site is enclosed by mature screen planting and users of the road would not have views of the mineral extraction when viewing the church. Due to the screen planting around the site, with the addition of bunding during the extraction phases, it is considered that mineral extraction within this site would not adversely affect the setting of the Church, the monument in the churchyard wall, the War Memorial or White House Farm.

M25.5 There are no Scheduled Monuments, Conservation Areas or Registered Historic Parks and Gardens within 2km of the site. A planning application for mineral extraction at this site would need to include a Heritage Statement to identify heritage assets and their settings, assess the potential for impacts and identify appropriate mitigation measures if required.

M25.6 Archaeology: There are Historic Environment records of multi-period finds and features within the site boundary. The site is in a wider landscape with a significant number of finds and features from multiple periods. Therefore, there is the potential that unknown archaeology exists on the site and an assessment of the significance of archaeological remains will be required at the planning application stage, in order to protect and mitigate the impact of mineral extraction in this site. The archaeology assessment may initially be desk-based but may need to be followed up with field surveys and trial-trenching.

2. Archaeological Desk-Based Assessment

A considerable amount of archaeological work took place prior to the 2011 and 2022 applications. These investigations are tabulated below:

NCCES Event Number	Type of Investigation	Dates of work	Reference
ENF151810	Desk-based assessment	01/06/08 - 30/06/08	Watkins, 2008
ENF136660	Geophysical (gradiometer) survey	01/07/08 - 30/09/08	Railton, 2008
ENF121858	Fieldwalking and metal-detecting survey	29/09/08 - 01/10/08	Barnett, 2009
ENF122106	Trial Trenching	17/11/08 - 02/12/08	Morgan & Hodges, 2009
ENF151930	Desk-based assessment (Environmental statement chapter)	01/08/21 - 31/08/21	Josephs, 2021

Taking into account the results of all the above investigations a brief for mitigation (archaeological excavation) was issued by Norfolk County Council Environment Service historic environment strategy and advice team on 22/08/2022 (Hickling, 2022). A Written Scheme of Investigation has been approved (Josephs, 2022) and wording for archaeological planning conditions agreed.

2.1 Heritage Impact Assessment – Below-Ground Archaeological Remains

Description of heritage assets: Below ground archaeological remains including:

- NHER [49678](#), ring-ditch of probable Bronze Age date
- NHER [49679](#), NHER [52651](#), linear features of probable Roman date
- NHER [49680](#), possible settlement activity of probable late Saxon or medieval date

Significance: Lesser

Level of Impact: Major Adverse

Mitigation: Preservation by record (archaeological Excavation) agreed

Level of Harm: Less than substantial harm

2.2 Archaeological assessment conclusions

One of the authors of this document is the leader of the team that advises all Local Planning Authorities in Norfolk, including The Broads Authority and Norfolk County Council on matters related to below-ground archaeology. In relation to MIN 25, all the iterative phases of archaeological investigation normally undertaken in advance of the determination of a Town and Country Planning Act application have already been completed.

Heritage assets affected by the site allocation:

- NHER 49678, ring-ditch of probable Bronze Age date.
- NHER 49679 NHER 52651, linear features of probable Roman date
- NHER 49680, possible settlement activity of probable late Saxon or medieval date

Contribution the site in its current form makes to the significance of the heritage assets:

Current arable use of the site preserves below-ground archaeological remains below the current level truncation caused by cultivation

Impact the allocation might have on that significance: Major adverse, mineral extraction will remove/destroy all conventional Holocene archaeological remains

Enhancements and avoiding harm: Preservation by record (archaeological Excavation) agreed

Is site allocation appropriate? Yes

The above is in line with the principles set out in 'Historic England, Mineral Extraction and Archaeology' (Historic England, 2020)

3. Built Heritage

3.1 Heritage Impact Assessment – Built Heritage

The site is currently an arable agricultural field. The proposed mineral extraction development would consist of two main stages, the extraction of the mineral over a period of less than 10 years, followed by phased restoration to a lower level to a nature conservation afteruse including grassland and a shallow wetland. Both stages of development have the potential to affect the setting of designated heritage assets.

A heritage impact assessment has been submitted with the 2022 planning application (Breedon, 2022, [FUL/2022/0056](#)). This considered the impact on the settings of designated heritage assets.

The most obvious and important designated heritage asset whose significance may be affected through change in setting caused by the proposed quarrying is the church of St Mary, Haddiscoe. The significance of many Norfolk churches is not just through their intrinsic historic, archaeological and architectural value. The setting of many churches through views approaching/from churches enhances significance as do views encountered in the landscape that take in more than one church.

A screen of trees approximately 20-25m thick was planted around the same time as the 2008-2011 planning applications. The trees in the screen are more than 10 years old and form a strong and coherent visual barrier and will also to some extent mitigate any impacts from noise and dust caused by quarrying operations.

It is unclear if there ever were views in the Haddiscoe area where multiple churches (St. Matthias, Thorpe, All Saints, Thurlton) could be seen. The existing tree screen probably negates any such views that may have existed.

The Specific Site Allocation Policy for MIN 25 within the Norfolk Minerals and Waste Local Plan (NM&WLP) specifies an 100m buffer for any quarry operations from the nearest residential dwellings. The nearest dwellings to the boundary of MIN 25 are 1 and 2 Church Lane (TM 4392 9698). This would push the extraction area approximately 40m north of the northern side of the existing tree belt.

In the Publication version of the NM&WLP (2022) the Specific Site Allocation Policy for MIN 25 contains the following requirements of particular relevance to this assessment:

- The submission of acceptable noise and dust assessments and a programme of mitigation measures to deal appropriately with any amenity impacts; mitigation measures should include setting back the working area at least 100 metres from the nearest residential properties.
- The submission of an acceptable Landscape and Visual Impact Assessment which will identify any potential impacts to the wider landscape and suggest appropriate mitigation measures; particularly regarding views from nearby properties, surrounding roads, and provide protection of the setting of nearby listed buildings. The mitigation measures should include a combination of advanced planting with native species and bunds.
- The submission of an acceptable phased working and progressive restoration scheme to a nature conservation afteruse, including retention of boundary hedgerows and trees, to provide landscape and biodiversity net gains.
- The submission of an acceptable Heritage Statement to identify heritage assets and their settings (including the Grade 1 Listed Church of St Mary, Grade II Listed monument in the churchyard wall, Grade II Listed Haddiscoe War Memorial, and the Grade II Listed White House Farm), assess the potential for impacts and identify appropriate mitigation measures if required.
- The submission of an appropriate archaeological assessment, which must be prepared in consultation with Norfolk County Council; this may initially be desk-based but may need to

be followed up with field surveys and trial trenching. The archaeological assessment will be used by Norfolk County Council / Historic Environment Service to agree appropriate mitigation measures.

Taking into account the following proposed controls on noise, dust and vehicle movement set out in planning application FUL/2022/0056 this constitutes less than substantial harm to the setting of St Mary's Church:

- Limits on hours of operation to prevent noise nuisance (hours are expected to be 08:00 to 17:00 on weekdays and 08:00 to 13:00 on Saturdays with no operations on Sundays or bank holidays).
- Water suppression as necessary to prevent unacceptable dust emissions.
- 3m high grass seeded screening bunds constructed between extraction area and closest dust sensitive receptors.
- Existing screen of hedgerow and trees around site perimeter will be retained.
- All HGVs to be covered prior to leaving the site.
- Exhaust silencers and white noise reversing alarms on mobile plant vehicles.
- On-site vehicle speeds to be kept below 10mph.
- Phased and progressive working and restoration to a low level.
- Mineral extraction working area to be no more than 2.5ha at any one time.
- No material to be imported for restoration.
- No mineral processing, except mobile screening, to take place on the site.

Designated heritage assets within 1km of the proposed quarry which have some potential intervisibility have been considered in the following tables. A map of the location of the designated heritage assets in relation to site MIN 25 is contained in Appendix 2.

The [Guidance on the Assessment of Mineral Dust Impacts for Planning \(2016\)](#) published by the Institute of Air Quality Management states that for sand and gravel workings impacts from dust are uncommon beyond 250m from the nearest dust generating activities. The guidance also states that it is commonly accepted that the greatest impacts will be within 100m of a source.

Vibration is not a significant factor in sand and gravel extraction in Norfolk due to the method and depth of working the mineral and therefore vibration has been excluded from the assessment tables below as there would be no adverse impacts.

The National Planning Practice Guidance (NPPG) states that a noise impact assessment should be carried out by the proposer of a mineral development at the planning application stage. The NPPG (Paragraph: 021 Reference ID: 27-021-20140306) contains information on appropriate noise standards for normal mineral operations as follows: "Mineral planning authorities should aim to establish a noise limit, through a planning condition, at the noise-sensitive property that does not exceed the background noise level (LA90,1h) by more than 10dB(A) during normal working hours (0700-1900). Where it will be difficult not to exceed the background level by more than 10dB(A) without imposing unreasonable burdens on the mineral operator, the limit set should be as near that level as practicable. In any event, the total noise from the operations should not exceed 55dB(A) LAeq, 1h (free field)."

Vehicle access for removing mineral from the quarry is proposed be off Crab Apple Lane. The traffic route for HGVs will start at Crab Apple Lane, then right onto the B1136 Loddon Road/Ferry Road for processing at the existing Norton Subcourse quarry. The route out of Norton Subcourse Quarry back along the B1136 Loddon Road to the A143 would be no change to that already permitted to take place from Norton Subcourse Quarry until 2036.

The assessment in the following tables takes the policy requirements in Policy MIN 25 in the NM&WLP as the baseline and considers whether any further mitigation measures would be required.

Description of heritage assets	Church of St Mary , Grade I Listed, NHLE 1169126 , NHER 64710	Monument to William Salter , set in churchyard wall, Grade II Listed, NHLE 1373170
Location	Church Lane, Haddiscoe TM 43931 96897	Set in churchyard wall 20 metres south of south door of St Mary's Church, Church Lane, Haddiscoe, TM 43938 96876
Significance	High	Medium
Distance from site boundary	102m to site boundary 129m to extraction area	127m to site boundary 150m to extraction area
Assessment of level of visual impact	Minor Adverse. There are very limited ground level views from/to the proposed quarry area due to the existing tree belt around site MIN 25. There would be no change to this if permission for quarrying was granted.	Neutral. The massing of St. Mary's church shields the monument from the proposed quarry. There would be no change to this if permission for quarrying was granted.
Contribution of MIN 25 to significance	The MIN25 area makes some contribution to the significance of the heritage assets. The undulating arable land north and west of the church accentuate the relatively prominent position of the church.	Minimal. There is no intervisibility with MIN 25
Assessment of noise and dust impact	Minor adverse due to distance. The church is 129m from the extraction area. As this is more than 100m away, noise and dust impacts could be effectively mitigated and controlled.	Minor adverse due distance. The monument is 150m from the proposed extraction area. As this is more than 100m away, noise and dust impacts could be effectively mitigated and controlled.
Assessment of traffic impact	Minor adverse. The HGV access point on Crab Apple Lane towards Loddon Road (B1136) would be at least 420m from the Church and traffic would then turn right to access the existing Norton Subcourse quarry.	Neutral due to distance. The HGV access point on Crab Apple Lane towards Loddon Road (B1136) would be at least 450m from the monument and traffic would then turn right to access the existing Norton Subcourse quarry.
Level of Harm	Less than substantial harm	Neutral
Mitigation	Existing tree screen, compliance with site allocation policy requirements and proposed controls detailed in application FUL/2022/0056	No additional mitigation required.

Description of heritage assets	Haddiscoe War Memorial , Grade II Listed, NHLE 1453240 , NHER 64710	White House Farmhouse , Grade II Listed, NHER 43089 , NHLE 1373172	Milestone at TM 4444 9690 , Grade II Listed, NHER 43086 , NHLE 1169228
Location	St Mary's Churchyard, Junction of Church Lane and Church Hill (A143), Haddiscoe, TM 43993 96863	White House Farmhouse, Thorpe Road, Haddiscoe; TM 44270 97231	Milestone at TM 4444 9690, The Street, Haddiscoe
Significance	Medium	Medium	Medium
Distance from site boundary	114m to site boundary 137m to extraction area	66m to site boundary 199m to extraction area	376m to site boundary 397m to extraction area
Assessment of level of visual impact	Neutral. Trees within the churchyard and the massing of St. Mary's church shields the memorial from the proposed quarry. There would be no change to this if permission for quarrying was granted.	Neutral. Existing trees/hedges and buildings either side of Thorpe Road mean there are no views from/to the proposed quarry area. There would be no change to this if permission for quarrying was granted.	Neutral. Existing trees/hedges and buildings either side of Beccles Road/The Street mean there are no views from/to the proposed quarry area.
Contribution of MIN 25 to significance	Minimal. There is no intervisibility with MIN 25	Minimal. There is no intervisibility with MIN 25	Minimal. There is no intervisibility with MIN 25
Assessment of noise and dust impact	Minor adverse due to distance. The War Memorial is 137m from the extraction area. As this is more than 100m away, noise and dust impacts could be effectively mitigated and controlled.	Minor adverse due to distance. White House Farmhouse is 199m from the extraction area. As this is more than 100m away, noise and dust impacts could be effectively mitigated and controlled.	Neutral. Site MIN 25 is 376m from the milestone so there would be no adverse noise and dust impacts due to distance.
Assessment of traffic impact	Neutral due to distance. The HGV access point on Crab Apple Lane towards Loddon Road (B1136) would be at least 500m from the War Memorial and traffic would then turn right to access the existing Norton Subcourse quarry.	Neutral due to distance. The HGV access point on Crab Apple Lane towards Loddon Road (B1136) would be at least 590m from White House Farm House and traffic would then turn right to access the existing Norton Subcourse quarry.	Neutral due to distance. The HGV access point on Crab Apple Lane towards Loddon Road (B1136) would be at least 930m from the milestone and traffic would then turn right to access the existing Norton Subcourse quarry.
Level of Harm	Neutral	Neutral	Neutral
Mitigation	No additional mitigation required.	No additional mitigation required.	No additional mitigation required.

Description of heritage assets	Thorpe Hall, Grade II Listed NHER 10710 , NHLE 1050527	Church of St Matthias, Grade I Listed NHER 10703 , NHLE 1306674
Location	Thorpe Hall, Church Road, Haddiscoe, TM 43678 97984	Church of St Matthias, Church Road, Haddiscoe TM 43597 98097
Significance	Medium	High
Distance from site boundary	310m to site boundary 349m to extraction area	445m to site boundary 484m to extraction area
Assessment of level of visual Impact	Minor Adverse. The existing tree screen is visible beyond an intervening hedge on the distant horizon.	Minor Adverse. The existing tree screen is visible beyond an intervening hedge on the distant horizon.
Contribution of MIN 25 to significance	Low to minimal. There is very limited intervisibility with MIN 25	Low to minimal. There is very limited ground level intervisibility with MIN 25
Assessment of noise and dust impact	Neutral. Site MIN 25 is 310m from Thorpe Hall so there would be no adverse noise and dust impacts due to distance.	Neutral. Site MIN 25 is 445m from the church so there would be no adverse noise and dust impacts due to distance.
Assessment of traffic impact	Neutral due to distance. The HGV access point on Crab Apple Lane towards Loddon Road (B1136) would be at least 610m from Thorpe Hall and traffic would then turn right to access the existing Norton Subcourse quarry.	Neutral due to distance. The HGV access point on Crab Apple Lane towards Loddon Road (B1136) would be at least 710m from Thorpe Hall and traffic would then turn right to access the existing Norton Subcourse quarry.
Level of Harm	Less than substantial harm	Less than substantial harm
Mitigation	Existing tree screen, compliance with site allocation policy requirements and proposed controls detailed in application FUL/2022/0056	Existing tree screen, compliance with site allocation policy requirements and proposed controls detailed in application FUL/2022/0056

3.2 Conclusions

Archaeological assessment conclusions

The heritage assets potentially affected by mineral extraction within proposed site allocation MIN 25 consist of both below ground archaeology, buildings and structures. A number of archaeological investigations have been carried out to support the current planning application. This evidence has been reviewed by the Norfolk Historic Environment Team, appropriate mitigation identified through a Written Scheme of Investigation agreed, and the wording of a planning condition agreed for inclusion of mitigation in any future grant of planning permission. It is concluded that impacts on archaeological assets can be appropriately mitigated for future mineral extraction within site allocation MIN 25.

Built heritage conclusions

This Heritage Impact Assessment has considered built heritage assets within 1km of the proposed allocation; details of these, their relationship to the site; potential impacts and levels of harm are shown in the previous assessment tables. The assessment indicates that the level of harm will be neutral for the Milestone, White House Farm, Haddiscoe War Memorial, and the Monument to William Salter and less than substantial harm for the Church of St Mary, Thorpe Hall and the Church of St Matthias with appropriate mitigation measures. Mitigation measures relate not only to visual impacts but also to noise, dust and lighting.

Traffic

The HGV traffic for the site is intended to use an improved junction between Crab Apple Lane and the B1136 Loddon Road, with traffic turning right towards Norton Subcourse Quarry for processing away from Haddiscoe and the Church of St. Mary and the other designated assets close to the Church. There would be intervisibility between the junction and the Church of St Mary. However, the B1136 already has a level of HGV traffic and the HGVs from site MIN 25 would only be visible for a short time as they turn into and out of the junction. The HGV movements would result in a Minor Adverse impact resulting in less than substantial harm to the setting of the Church of St Mary for the duration of extraction.

After processing at Norton Subcourse Quarry, the HGV traffic leaving Norton Subcourse Quarry would then travel along the B1136 towards the A143 as currently occurs in accordance with the existing planning permission for Norton Subcourse Quarry. The B1136 is a main distributor road in the Norfolk Route Hierarchy and as such is suitable for use by HGV traffic. The A143 can be accessed from either end of Loddon Road, therefore HGV quarry traffic from Norton Subcourse Quarry currently accesses the A143 from either end of the B1136 depending on the location of the market for the mineral.

Visual impact

The site allocation has mature boundary planting in place along the northern, western and southern edges which screens the site from the majority of viewpoints, and limits intervisibility. Existing buildings and topography limit the intervisibility between the site and the designated heritage assets, such that none of the identified assets has intervisibility between themselves and the site at ground level. The allocation site is visible from the towers of both churches, although this is a long-range view from the Church of St Matthias and neither of the towers are open or accessible to the public.

Noise, dust and lighting

The site allocation policy MIN 25 states that development will require the submission of acceptable noise and dust assessments and a programme of mitigation measures to deal appropriately with any amenity impacts. As there are residential properties closer to the site than the heritage assets, any mitigation measures for amenity impacts would also appropriately address any potential noise and dust impacts relevant to the heritage assets. Policy MIN 25 also requires mitigation measures to provide protection of the setting of nearby listed buildings, including a combination of advanced planting with native species and bunds.

In addition, future planning applications would be required to comply with the other relevant policies in the NM&WLP which include Development Management Criteria Policy MW1. Policy MW1 requires proposals to demonstrate that the development would not have an unacceptable impact on local amenity and health (including noise levels, air quality, dust, light pollution). Paragraphs 6.9 to 6.17 of the NM&WLP set out further details on pollution and amenity impacts and examples of measures to remove or reduce emissions at source.

The other mitigation measures proposed in planning application FUL/2022/0056 and summarised in section 3.1 of the HIA are considered to be matters of detail for a planning application, not a local plan site allocation policy.

The proposed site allocation incorporates indicative standoff areas from the site boundary to mitigate potential impacts from noise and dust. The current planning application also incorporates standoff areas although some of these are different from those in the allocation due to the greater level of detail on the working scheme and potential impacts in the planning application. The proposal within the site allocation is that the mineral extracted would be transported to the nearby plant at Norton Subcourse for processing. Therefore, it is concluded that the impacts to built heritage assets would be subject to no more than less than substantial harm.

There are residential properties nearer to the B1136 and the site boundary than the church. Therefore, in setting back the working area at least 100m from the nearest residential property, it will also be at least 100m from the church and the historic churchyard. As stated in the HIA assessment table, the church is over 100m from the site boundary and 129m from the extraction area. Therefore, no change is required to the site allocation policy in this regard.

Public Right of Way

The Haddiscoe BR5 bridleway runs across the northern third of the site in an east-west orientation. The restoration proposed in the allocation policy would reinstate this bridleway following temporary diversion during the extraction period. There is currently no intervisibility from the bridleway to the majority of the designated assets and this would not change on restoration. There is currently a view of the tower of St Mary's Church above the treeline from the bridleway. During the extraction phase the temporary diversion of the bridleway would result in the loss of this view from some of the bridleway. On restoration and reinstatement of the bridleway along its current route, the view of St Mary's Church tower from the bridleway would be visible again.

Restoration

The proposed restoration in the site allocation Policy MIN 25 is to a combination of grassland, woodland and wetland/shallow pond feature. This is very similar to the proposed restoration scheme in the current planning application (appendix 3) which includes the reinstatement of hedgerows, including one along the line of PRow BR5 which is shown on the 1946 aerial survey photography but was subsequently removed postwar. This, together with other hedgerow planting, will subdivide the site into similarly sized fields to those that existed historically providing an enhancement to the setting of the surrounding heritage assets. As the mineral company proposes to retain the boundary planting on restoration, and this is also required by the site allocation policy, the very limited intervisibility between the designated assets and the site will not change following restoration. A modification should be proposed to paragraph M25.23 (Restoration) to add: "Restoration shall include the retention of boundary hedgerows and trees and should include the reinstatement of historic hedgerows and field boundaries informed by Historic Landscape Characterisation". Policy MP7: 'Progressive working, restoration and afteruse' states that restoration proposals must demonstrate that "the scheme has been informed by the historic environment and historic landscape character assessments and the restoration enhances the historic environment." Therefore, no changes to Policy MIN 25 are required.

Overall conclusion

The proposed specific site allocation MIN 25 will play a part in meeting the forecast need for sand and gravel during the Plan Period to 2038. It is considered that the site allocation can achieve this without causing unacceptable impacts and specific to this assessment will not result in unacceptable harms to the significance of the built heritage assets in proximity to the site. For

archaeology, acceptable mitigation measures have already been agreed in relation to the planning application, and the NMW&WLP policies would require a similar approach should the current application not be granted.

The proposed site allocation policy is justified in terms of its potential impacts and appropriate mitigation measures, is deliverable, and is consistent with the NPPF including the need to conserve heritage assets, including archaeology, in a manner appropriate to their significance.

4. Bibliography

Author	Publication date	Document title	Publisher
Barnett, A	2009	An Archaeological Fieldwalking Survey at Manor Farm, Haddiscoe	NAU Archaeology Report 1935b, unpublished
Breedon	2022	Environmental Statement, 12.0 Cultural Heritage (planning application reference FUL/2022/0056)	Breedon Trading, unpublished
Hickling, S. A.	2022	Brief for Open-Area Excavation as Part of a Programme of Archaeological Mitigatory Works, Areas 2 and 3 of Manor Farm, land north of Loddon Road, Haddiscoe, Mineral Extraction	Norfolk County Council, unpublished
Historic England	2015a	The Historic Environment and Site Allocations in Local Plans	Historic England
Historic England	2015b	Managing Significance in Decision-Taking in the Historic Environment Historic Environment Good Practice Advice in Planning: 2	Historic England
Historic England	2017	The Setting of Heritage Assets Historic Environment Good Practice Advice in Planning Note 3 (Second Edition)	Historic England
Historic England	2020	Mineral Extraction and Archaeology	Historic England, Swindon
Josephs, A.	2021	12.0 Cultural Heritage	Breedon Aggregates Environmental Statement, unpublished
Josephs, A.	2022	Haddiscoe Quarry Archaeological Mitigation Strategy and Written Scheme of Investigation	Andy Josephs Associates, unpublished
Morgan, S. and Hodges, L	2009	An Archaeological Evaluation at Manor Farm, Haddiscoe, Norfolk	NAU Archaeology Report 2026, unpublished

Author	Publication date	Document title	Publisher
Robertson, D., Albone, J., Watkins, P., Percival, J. W., Hickling, S., Hamilton, H., Heywood, S., Shoemark, J., Tremlett, S and Jarvis, C.	2018	Standards for Development-Led Archaeological Projects in Norfolk	Norfolk County Council, unpublished
Railton, M	2008	Geophysical Surveys of Land at Manor Farm, Haddiscoe, Norfolk	North Pennines Archaeology Report CP741, unpublished
Watkins, P	2008	An Archaeological Desk-based Assessment of Land at Manor Farm, Haddiscoe, Norfolk	NAU Archaeology Report 1857, unpublished

Appendix 1 – Views to/from Designated Heritage assets



Plate 1 Looking North from St. Mary's church towards the proposed quarry area



Plate 2 Looking Southeast from junction Of Crab Apple Lane and Loddon Road towards St. Mary's Church.



Plate 3 Looking North from top of tower, St. Mary's Church towards MIN25



Plate 4 Looking North from the Monument to William Salter towards St. Mary's Church.



Plate 5 Looking North from War Memorial towards the proposed quarry area



Plate 6 looking Southwest from Thorpe Road (White House Farmhouse) towards the proposed quarry area



Plate 7 looking South from Thorpe Hall towards the proposed quarry area

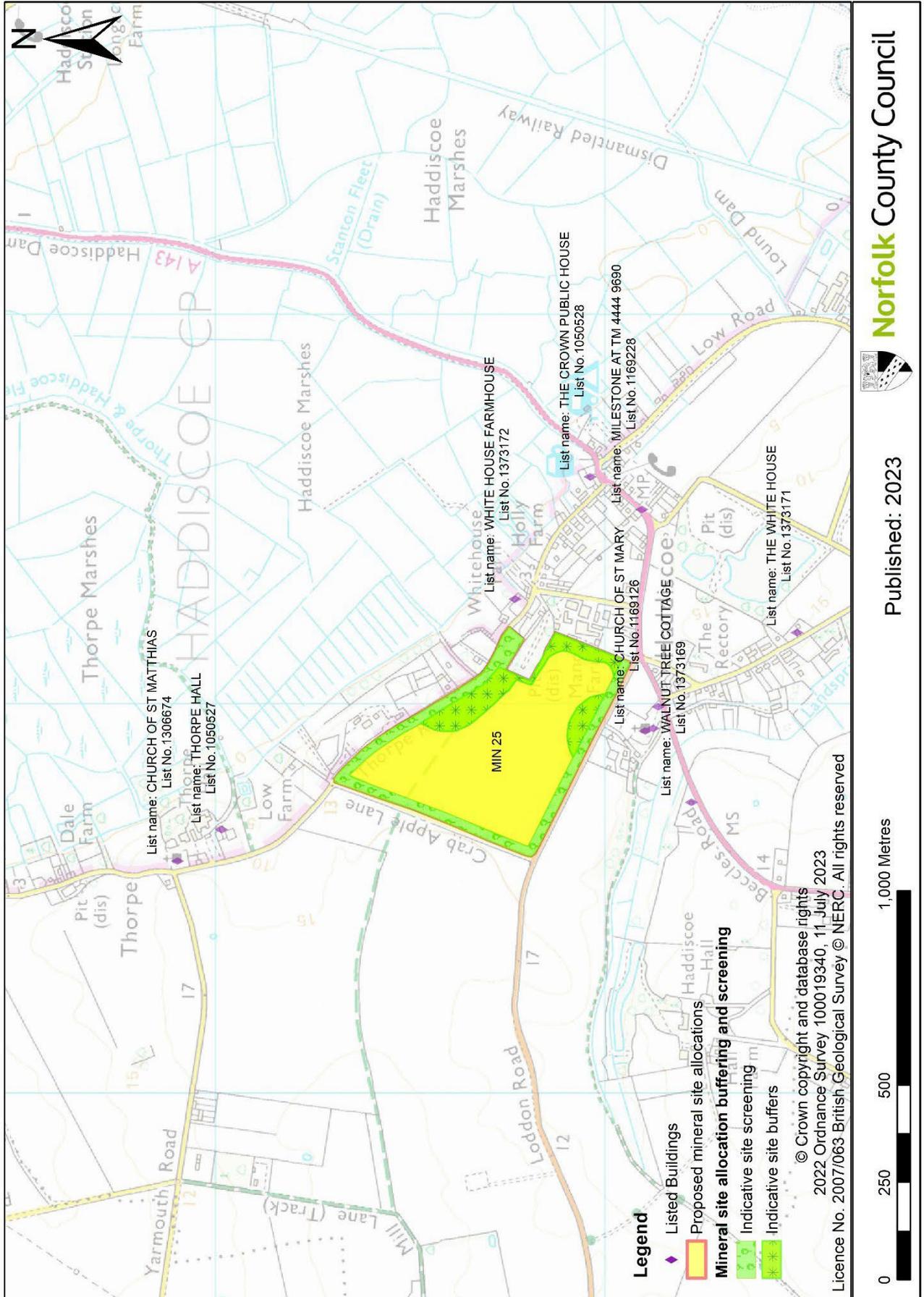


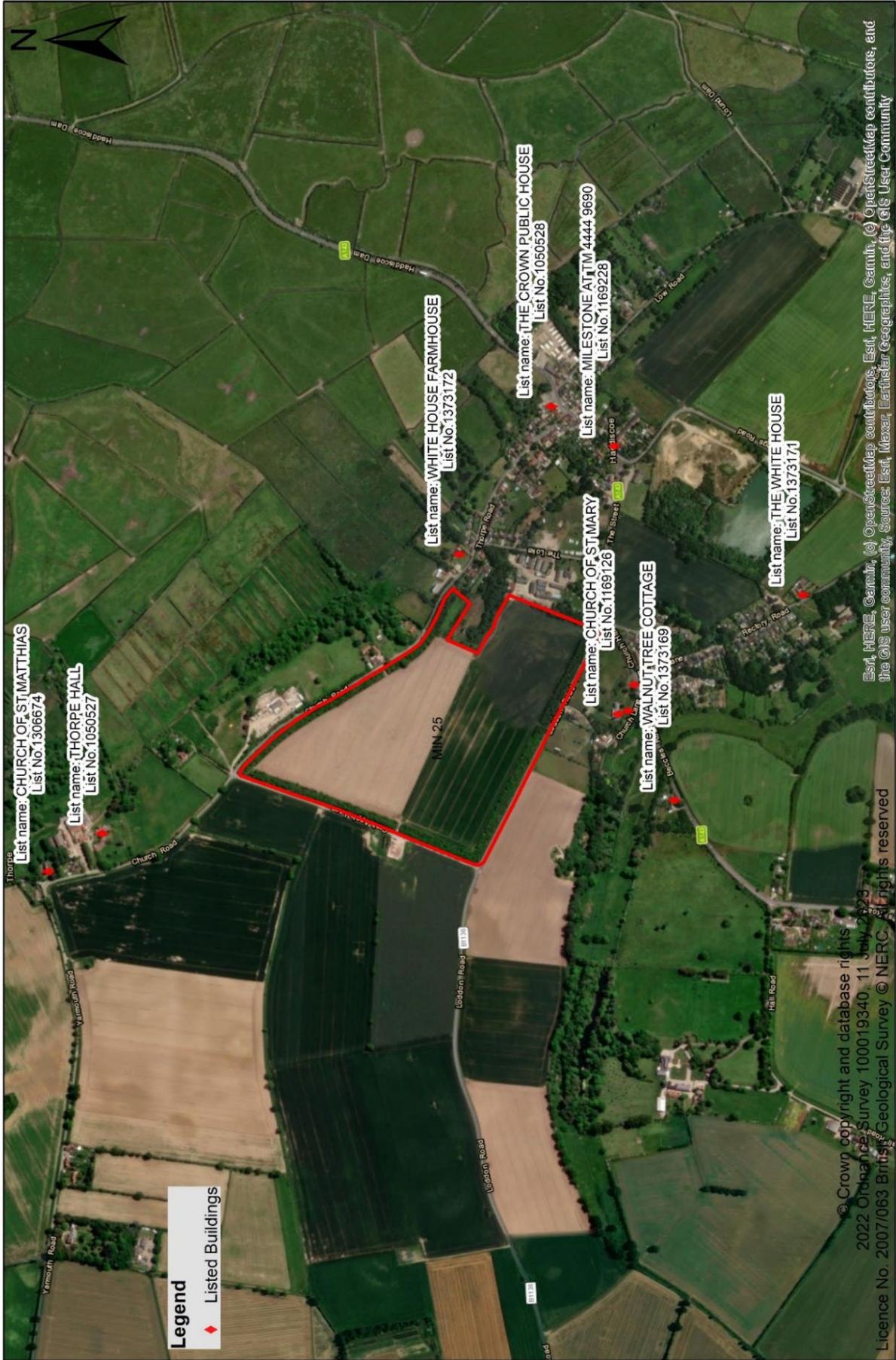
Plate 8 looking South from Church of St Matthias towards the proposed quarry area



Plate 9 Looking South from top of tower, St. Matthias's Church towards MIN25, St Mary's Church in centre right of frame

Appendix 2 – Maps of designated heritage assets and site MIN 25











Appendix 3 – Concept Restoration Plan for application FUL/2022/0056

