



Historic England

**Examination of Publication Draft
Norfolk Minerals and Waste Local Plan
Matter 4
Historic England, Hearing Statement
May 2024**

Historic England is the principal Government adviser on the historic environment, advising it on planning and listed building consent applications, appeals and other matters generally affecting the historic environment. Historic England is consulted on Local Development Plans under the provisions of the duty to co-operate and provides advice to ensure that legislation and national policy in the National Planning Policy Framework are thereby reflected in local planning policy and practice.

The tests of soundness require that Local Development Plans should be positively prepared, justified, effective and consistent with national policy. Historic England's representations on the Publication Draft Local Plan are made in the context of the requirements of the National Planning Policy Framework ("the Framework") in relation to the historic environment as a component of sustainable development.

Historic England Hearing Statement

Introduction

- 1.1 This statement addresses the Inspector's questions with regards Matter 4, Question 7.
- 1.2 This hearing statement should be read alongside Historic England's comments submitted at previous consultation stages of the Local Plan, and the [Statement of Common Ground](#) (SOCG) December 2023 between Historic England and Norfolk County Council.

Matter 4 Whether the Mineral Extraction Sites proposed for sand and gravel, carstone and silica sand extraction are acceptable in planning and environmental terms and are deliverable.

Issue: Whether the methodology for the identification of future sites is robust and whether the identified sites are acceptable in planning and environmental terms and are deliverable.

Questions:

7. Specific Site Allocation MIN 25 – land at Manor Farm, Haddiscoe - Does the assessment adequately consider the impact of mineral extraction operations on heritage assets, the living conditions of nearby residents and tourism?

SUMMARY

2.1 Historic England continues to have serious concerns regarding the proposed allocation of site MIN25 at Manor Farm, Haddiscoe. It is our view that it would lead to unacceptable level of harm to heritage assets of the highest significance (particularly St Mary’s Church, grade I listed) that is not adequately mitigated. It is therefore not consistent with national policy for minerals and the protection of the historic environment.

Introduction

2.2 In considering question 7 and in view of Historic England’s remit, our response will focus on the impact on designated heritage assets. We will first identify the key heritage assets that may be affected, the extent to which the impact on those assets has been assessed, the relevant planning policy position and finally whether the allocation is appropriate in light of the assessment and policy.

Designated Heritage Assets

2.3 The proposed site allocation MIN25 at Manor Farm, Haddiscoe is close to a number of designated heritage assets including the Grade I Listed Church of St Mary, Haddiscoe. The grade I listed St Matthias Church, Thorpe lies to the north of the site. There are a number of grade II heritage assets nearby including: the White House Farmhouse, Thorpe Hall, Haddiscoe War Memorial and a monument to William Salter in St Marys Churchyard.

2.4 Given their highly graded status we provide further detail in relation to the significance of the two churches.

2.5 a) St Mary's Church, Haddiscoe

This grade I listed church lies just 110m away from the site allocation, with its churchyard (part of the curtilage and a noise sensitive receptor) being just approximately 20 metres across the B1136.

2.6 St Mary's is among Norfolk's most striking round tower churches. It holds exceptional architectural and historic interest, reflected in its listing at grade I which places it in the top 2.5% of listed buildings nationally.

2.7 St Mary's slightly elevated position on an escarpment lends it a dramatic presence in the rural landscape which in evolving forms it has been the highest status structure for almost a thousand years.

2.8 The land falls away sharply to south of the church, giving it a particular prominence when seen from the south, including from the main part of Haddiscoe village.

2.9 To the north, including the proposed quarry site, the land is quite different, being typically flat, open, arable land. This is a working agricultural landscape that has evolved across time, but retains this overarching character that allows the parish church to be experienced in its important historic agricultural setting. This is illustrated particularly well in important views east along Loddon Road on the south boundary of the site.

2.10 Though not readily accessible to the public, panoramic views are available over this landscape setting from St Mary's tower, which served as a local defensive lookout during the Second World War. The application site, being very large and close to the church, has a dominant part in these views.

2.11 b) St Matthias Church, Thorpe

To the north stands another important historic church, St Matthias, also a round tower church and also a grade I listed building.

2.12 Together, the parish churches of Thorpe and Haddiscoe mark historic settlement along this side of the lowland area that includes the Broads. There is a visual connection across the proposed allocation site between the two grade I listed churches.

Heritage Impact Assessment

2.13 Historic England has requested the completion of a Heritage Impact Assessment for this site over a number of years as part of the evidence base for the Minerals and Waste Local Plan.

- 2.14 This is in line with our [Historic England Advice Note 13 on Mineral Extraction and Archaeology](#). This advice requires the preparation of Heritage Impact Assessments to evaluate the extent to which the significance of any assets may be harmed and to identify measures to remove or reduce that harm. [Historic England Advice Note 3: The Historic Environment and Site Allocations in Local Plans](#) sets out advice on site allocations in Local Plans.
- 2.15 The HIA methodology set out in our advice note advocates a 5-step process. The final step in that process is to determine whether the proposal site allocation is appropriate in light of the NPPFs tests of soundness.
- 2.16 The advice note also states that decisions should be clearly stated and evidenced within the Local Plan, particularly where site allocations are put forward where some degree of harm cannot be avoided, and be consistent with legislative requirements.
- 2.17 Two heritage assessments that have been prepared in relation to this site:
- 2.18 **i) Heritage Impact Assessment, Norfolk County Council December 2023**
A Heritage Impact Assessment for the site has now been completed in December 2023 by Norfolk County Council ([ED B19](#)). This has been prepared as evidence to support the Minerals and Waste Local Plan.
- 2.19 We welcome the preparation of an HIA for the site. The HIA has been helpful to better understand some of the potential impacts of extraction at this site allocation.
- 2.20 The HIA identifies a degree of harm to several heritage assets including The Church of St Mary, Church of St Matthias both listed at grade I and Thorpe Hall listed at grade II. The HIA states that the level of harm would be less than substantial.
- 2.21 The HIA concludes that the existing tree belt around the allocation site, compliance with the site allocation policy requirements and other local plan policies, through the type of controls proposed in planning application FUL/2022/0056 would provide adequate mitigation measures for the setting of the nearby listed buildings.
- 2.22 It is our view that the HIA underplays the impact on the historic environment, in particular the Church of St Mary and its setting which contributes to its significance.

2.23 **ii) Cultural Heritage Assessment as part of Environmental Statement to support planning application, Breedon, 2022**

A separate Heritage Impact Assessment was submitted with the 2022 planning application (Breedon, 2022, [FUL/2022/0056](#)).

2.24 This assessment identified a negligible adverse impact of slight significance on the view from the church of St Mary, Haddiscoe.

2.25 The assessment of the proposal's impact to the setting of heritage assets, particularly the two churches, focuses on views between the site and the designated heritage assets.

2.26 It is our view that this assessment underplayed the impact of the proposed development on heritage assets. It also fails to consider wider impacts such as noise, vibration, dust and traffic.

Harm to Heritage Assets – Historic England position

2.27 The Heritage Impact Assessments both identify a degree of harm to heritage assets, although it is our view that the level of harm identified is underplayed.

2.28 Historic England continue to have serious concerns about the introduction of an extraction site at Haddiscoe due to the level of harm it would cause to the historic environment, primarily due to its impact on the significance of St Mary's Church, Haddiscoe and other heritage assets including the historic and group value of the Thorpe and Haddiscoe round tower churches.

2.29 We have consistently set out our concerns in relation to this site dating back over ten years.

2.30 Whilst the proposed allocation site is now entirely north of Loddon Road and so would have a lower impact than the scheme that was refused ten years ago, this amendment does not remove the harm to the significance of the grade I building or reduce it to a level of low harm.

2.31 Significance is defined in the National Planning Policy Framework as the value of a heritage asset to this and future generations because of its heritage interest. It derives not only from an asset's physical presence but also from its setting.

2.32 The contribution that setting makes to the significance of an asset does not depend on there being public rights or an ability to access or experience that setting. (Planning Practice Guidance Paragraph: 013 Reference ID: 18a-013-20190723 Revision date: 23 07 2019).

2.33 Views of, or from, an asset play an important part but the way we experience an asset in its setting is also influenced by other factors such as noise, landscape character, land uses, and our understanding of the historic relationship between places.

2.34 It is our view that there would be multiple impacts on factors that contribute to the significance of St Mary's Church, and the ability to appreciate that significance. These include impacts on views, landscape character/historic relationship and environmental factors such as noise, dust and vibration:

2.35 a) Views

While the most prominent views of the church would not be affected, the development would result in the loss of north views of the church tower as historic landmark in an expansive agricultural setting, particularly reducing the ability to appreciate the church away from a busy road.

2.36 b) Landscape Character and Historic Relationship

The development would disrupt and diminish the historic and group value of the Thorpe and Haddiscoe round tower churches, permanently altering the intervening landscape and intruding into views.

The proximity and scale of the site mean the temporary and permanent changes in the important agricultural setting would be a major factor in views from the tower, exacerbated by alignment with views to Thorpe.

2.37 c) Environmental issues – noise, dust and vibration

Environmental factors such as industrial noise and vibration may also detract from the experience of the church in its rural surroundings as any increase over existing is likely to be found disruptive and alien in character.

2.38 There would be adverse impacts on multiple factors that contribute to the significance of St Mary's Church, and the ability to appreciate that significance, which are not adequately mitigated. This would lead to harm to the significance of heritage assets, most particularly the grade I listed St Mary's Church. In NPPF terms, the harm to the significance of St Mary's Church would be 'less than substantial' and should be weighed against public benefit.

Relevant Planning Policy

2.39 Relevant minerals policy is clear that there should be no unacceptable adverse impacts on the historic environment (NPPF para 210f).

- 2.40 As grade I listed buildings, very great weight (NPPF para 199) should be given to the conservation of these assets when considering both temporary and permanent impacts of the proposal on their significance.

Proposed Modification

- 2.41 We welcome the proposed modification to paragraph M25.23 in relation to site restoration. However, this clearly does not address and mitigate the harm to the Church during the operation of the site.

Conclusions

- 2.42 Therefore, Historic England continues to have serious concerns regarding the proposed allocation of this site. It is our view that it would lead to unacceptable level of harm to heritage assets of the highest significance (particularly St Mary's Church) that is not adequately mitigated. It is therefore **not consistent with national policy** for minerals and the protection of the historic environment.