

**Appendix A: Table of Historic England’s comments on the Draft Norfolk Minerals and Waste Local Plan Local Plan Publication Draft**

Page	Section	Sound/ Unsound	Comments	Suggested Change
11	Para 2.8/2.9 and site assessments for allocations	Unsound	<p><b>Historic Environment and Archaeology assessment</b>                      We have reviewed the site assessments methodology and the site assessments themselves.</p> <p>Whilst these are a helpful starting point, they do not constitute Heritage Impact Assessments. As advised in previous consultations, we continue to request that Heritage Impact Assessments are prepared to inform a number of the more sensitive the allocations.</p> <p>Our advice note 13 <a href="#">Mineral Extraction and Archaeology</a> sets out the requirement for heritage impact assessments to inform site allocations in Minerals Plans.</p> <p>It states, ‘Where potential allocations are identified as being likely to impact on heritage assets, undertake an appropriate Heritage Impact Assessment 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’.</p> <p>The 5-step methodology for HIA is set out on page 5 of our advice note HEAN 3 <a href="#">Site Allocations in Local Plans</a>.</p>	Prepare Heritage Impact Assessments for the sites indicated in the table below prior to EiP to inform site allocation and revised policy wording.
16	3.21- 3.23 Carstone	Unsound	We welcome the reference to Carstone. It is important that provision should be made to protect historic sources of building stone from sterilisation from non-minerals development or from overuse as fill etc. in order that they might be used for the future repair of historic properties or even for new build using traditional vernacular. The plan should provide an appropriate Policy which would facilitate the reopening of historic sources of building stone where they are needed for the future repair of historic properties/ building in the traditional vernacular.	Ensure provision is made for the use of Carstone in repairs of historic buildings and for new build in the traditional vernacular materials.

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22-24	Map 1 Key Diagram	Comment	We note that the map includes lots of different designations but no heritage designations. Whilst we appreciate that putting individual listed buildings on such a map of this scale would be difficult, area-based designations e.g. Conservation Areas, Registered Parks and Gardens and scheduled monuments could be included and would help to identify a wider range of environmental factors.	Include heritage designations e.g. conservation areas, registered parks and gardens and scheduled monuments on the map.
27	Policy MW1	Unsound	<p>Although our preference would be for a separate historic environment policy, we recognise that this policy is now much more detailed in relation to the historic environment which is welcomed.</p> <p>We note that the policy has been expanded to include greater reference to the historic environment which is welcomed. This has included reference to the NPPF, balancing harm and public benefit and avoiding harm in the first.</p> <p>The policy does reference cumulative effects and enhancement which is welcomed.</p> <p>The policy now also includes reference to the need to conserve and where opportunities arise enhance the historic environment which is welcomed.</p> <p>In the list of bullet points we suggest a minor rewording to read;</p> <ul style="list-style-type: none"> <li>the <del>setting</del> significance of heritage assets (<u>including any contribution made to significance by setting</u>) and protected landscapes,</li> </ul> <p>Although this represents an improvement on the previous draft of the policy, we remain concerned that the policy does not provide sufficient protection for the historic environment. Normally we would expect to see a specific separate policy for the historic environment in a Minerals and Waste Local Plan. This policy is insufficient as it stands. This policy remains unsound as it does not meet the requirements of paragraph 210(f) of the Framework.</p>	<p>Include a separate policy for the historic environment to more closely reflect the requirements of the NPPF. This should cover matters such as the need to conserve and enhance heritage assets and their settings and incorporate the relevant tests in relation to harm.</p> <p>The separate historic environment policy should also address below ground archaeology.</p>

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			<p>In fact, Policy MW2 appears to be a similar list of areas to cover in paragraph 210 but provides limited historic environment criteria against which planning applications will be assessed so as to ensure that there are no unacceptable adverse impacts.</p> <p>As this policy underpins all the other policies in the plan we are concerned that, as drafted, this policy undermines the plan.</p> <p>We are also concerned about the lack of detail in relation to below ground archaeology in this policy. In relation to archaeology, we offer the following more detailed advice:</p> <p>When considering the historic environment, it is necessary to consider the below ground archaeological remains which includes structures, artefacts, and deposits/features of palaeoenvironmental and geoarchaeological interest such as palaeochannels.</p> <p>The potential for these sorts of remains to be present, both within the area of proposed works and in the adjacent areas needs to be investigated as part of the desk-based assessment and evaluation stages.</p> <p>The impacts of the proposed extraction works also need to be considered in terms of the direct and indirect impacts that may occur. This includes the potential for the works to alter the groundwater levels within the areas of the proposed works and in adjacent areas, which may affect the movement of water through archaeological deposits, or the preservation conditions. If this occurs it can result in the damage or even loss of vulnerable archaeological remains, such as waterlogged wood, leather or palaeoenvironmental remains, or effect the preservation of archaeological materials (e.g. peat).</p>	

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			<p>There is also the potential for the effects of mineral extraction to impact adjacent areas. For example, hydrological assessments were carried out before, during and after the extraction of materials at the Over quarry, Cambridgeshire, which demonstrated that ground water levels were lowered by between 2 to 5m up to 500m from the quarry face (French 2004, Environmental Archaeology vol 9).</p> <p>We would therefore recommend that the following Historic England documents are referred to in terms of the materials that may be present and how the potential impacts could be investigated, such as changes to the groundwater levels or chemistry in the area:</p> <p>Preservation of Archaeological Remains (2016):  <a href="https://historicengland.org.uk/images-books/publications/preserving-archaeological-remains/">https://historicengland.org.uk/images-books/publications/preserving-archaeological-remains/</a></p> <p>Environmental Archaeology (2011):  <a href="https://historicengland.org.uk/images-books/publications/environmental-archaeology-2nd/">https://historicengland.org.uk/images-books/publications/environmental-archaeology-2nd/</a></p> <p>Geoarchaeology (2015):  <a href="https://historicengland.org.uk/images-books/publications/geoarchaeology-earth-sciences-to-understand-archaeological-record/">https://historicengland.org.uk/images-books/publications/geoarchaeology-earth-sciences-to-understand-archaeological-record/</a></p>	
31	6.30	Unsound	<p>Whilst we broadly welcome the requirement for a heritage and archaeology statement to accompany a planning application, for some sites this assessment work may need to be done prior to allocation within the Local Plan as part of the evidence base. We would expect to see this work completed prior to EiP. Further detail on this is given in relation to the comments on specific sites later in this table.</p>	Prepare HIAs for sites MIN96 Spixworth and MIN25 Haddiscoe.
52	Policy WP2 Spatial Strategy for Waste	Unsound	<p>We welcome the addition of designated heritage assets as a bullet point in this policy. Conservation Areas should also be added to this list as they are designated heritage assets.</p>	Amend text to read;

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	Management Facilities		<p>Substantial harm is a very high bar. Less than substantial harm is still harm and harm should be avoided in the first instance. We suggest that you reword this bullet point to delete the word substantial and add reference to significance and setting.</p> <p>The bullet point would then read:</p> <ul style="list-style-type: none"> <li>a designated heritage asset, including listed buildings, registered parks and gardens, <u>conservation</u> areas and scheduled monuments, or their settings if the proposed development would cause <del>substantial</del> harm to <del>or</del> the <del>less</del> <u>significance</u> of the heritage asset (<u>including any contribution to significance by setting</u>).</li> </ul>	<ul style="list-style-type: none"> <li>a designated heritage asset, including listed buildings, registered parks and gardens, <u>conservation</u> areas and scheduled monuments, or their settings if the proposed development would cause <del>substantial</del> harm to <del>or</del> the <del>less</del> <u>significance</u> of the heritage asset (<u>including any contribution to significance by setting</u>).</li> </ul>
60	Policy WP11 Disposal of inert waste by landfill	Sound	We welcome the changes made to criterion d to reference the historic environment. We also welcome the text at paras W11.3 and W11.4 regarding restoration and Historic Landscape Characterisation.	-
61	Policy WP12 Non-Hazardous and hazardous waste landfill	Sound	We welcome the changes made to criterion e to reference the historic environment. We also welcome the text at paras W11.3 and W11.4 regarding restoration and Historic Landscape Characterisation.	-
65	Policy WLP15 Whitlingham Water Recycling Centre	Sound	We welcome the reference to Crown Point RPG in the policy.	-
66	WLP16 Design of Waste Management Facilities	Sound	We welcome bullet e) in policy WP16 on the use of design to protect, conserve and, where opportunities arise, enhance the historic environment.	-
69	Carstone Requirement and Shortfall	Unsound	We note the section on Carstone. Carstone is probably the most important building stone within the county and can be seen in historic buildings and structures of western Norfolk. It is largely quarried today for construction rather than conservation purposes, but it is essential that some extraction takes place for building stone uses and that	Consider site allocation for Carstone as building stone for conservation purposes (rather than just for general construction).

Page	Section	Sound/ Unsound	Comments	Suggested Change
			<p>minimal crushing of good quality carstone takes place for construction purposes.</p> <p>We note that there is one site allocation later in the Plan for Carstone although the Plan states that this is of insufficient quality for use as a building stone.</p> <p>We therefore we recommend that an alternative site for building stone be sought. It is important that such stone is available for historic conservation work and also for limited use in new build where using traditional building materials can be a helpful design tool in picking up on local vernacular, character and distinctiveness in sensitive design.</p>	
73	MP2.1	Unsound	We note that this section includes a list of factors that have been considered in the spatial strategy for minerals. We are very concerned to see that there is still no reference to the historic environment in this regard.	Ensure that historic environment is given due consideration in spatial strategy and (if it has) add reference to the historic environment in this paragraph.
75	Policy MP2 Spatial Strategy for Minerals Extraction	Unsound	<p>We welcome the addition of designated heritage assets as a bullet point in this policy. Conservation Areas should also be added to this list as they are designated heritage assets.</p> <p>Substantial harm is a very high bar. Less than substantial harm is still harm and harm should be avoided in the first instance. We suggest that you reword this bullet point to delete the word substantial and add reference to significance and setting.</p> <p>The bullet point would then read:</p> <ul style="list-style-type: none"> <li>a designated heritage asset, including listed buildings, registered parks and gardens, <u>conservation areas</u> and scheduled monuments, or their settings if the proposed development would cause <del>substantial</del> harm to <del>or</del> the <del>less</del> <u>significance of the heritage asset (including any contribution to significance by setting).</u></li> </ul>	<p>Amend text to read;</p> <ul style="list-style-type: none"> <li>a designated heritage asset, including listed buildings, registered parks and gardens, <u>conservation areas</u> and scheduled monuments, or their settings if the proposed development would cause <del>substantial</del> harm to <del>or</del> the <del>less</del> <u>significance of the heritage asset (including any contribution to significance by setting).</u></li> </ul>

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76	Policy MPSS1 Silica sand extraction sites	Sound	We welcome the criteria based policy approach for Sand and Silica given the many factors that have made it difficult to allocate Areas of Search.  We welcome criteria c, d, e and f.	-
79	Policy MP5 Core River Valleys	Sound	We welcome the reference to the historic environment.	-
80	Policy MP6 Cumulative impacts and phases of workings	Sound	The cumulative impact of mineral workings on the historic environment can be significant. We therefore welcome this policy.	-
81	MP7.8	Sound	We welcome the reference to historic character and landscape characterisation in paragraph MP7.8.	-
82	Policy MP7 Progressive working, restoration and after use	Unsound	We welcome the reference to restoration proposals being informed by the historic environment. We suggest a very slight amendment to the wording to read: <ul style="list-style-type: none"> <li>The scheme has been informed by the historic environment and historic landscape characterisation and landscape character assessments and the restoration enhances the historic environment.</li> </ul> <p>Historic landscape characterisation and landscape character assessments are slightly different but have complementary roles.</p>	Amend text to read; <ul style="list-style-type: none"> <li>The scheme has been informed by the historic environment and historic landscape characterisation and landscape character assessments and the restoration enhances the historic environment.</li> </ul>
87	Policy MP11 Mineral Safeguarding Areas and Mineral Consultation Areas	Sound	We welcome the reference to the conservation benefits of carstone.	-
107	Policy MIN12 (land north of	Sound	Whilst there are no designated heritage assets within the site boundary, there are three listed buildings to the east of the site, including the	-

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	Chapel Lane, Beetley		<p>Grade I listed Church of Mary Magdalene and Old Hall and Beetley Hall, both listed at grade II. Given the open nature of the landscape in this area, extraction at the site could have an impact on the wider setting of the church.</p> <p>We welcome the specific reference to the nearest heritage assets to read 'heritage assets and their settings (including the grade I listed Church of Mary Magdalene and grade II listed Old Hall and Beetley Hall)...'</p>	
111	MIN 51 and MIN13 and MIN08 Land west of Bilney Road, Beetley	Sound	<p>There are no designated heritage assets on site. The grade II* church of St Peter, Manor Farmhouse listed t grade li and a scheduled monument (a deserted medieval village) lie to the west of the sites whilst to the north of the site lies East Bilney and several listed buildings, the closets of which is the grade II listed Almshouses.</p> <p>We welcome the specific reference to the nearest heritage assets in the policy.</p>	-
116	MIN200 Land west of Cuckoo Lane, Carbrooke	Sound	<p>Although there are no designated heritage assets within the site boundary, the grade II listed Mill House and Windmill lie just to the south of the site. Given the proximity of these assets, we have concerns that extraction at the site will impact upon the settings of these assets. There are also a number of other listed buildings including the church of St Peter and St Paul to the north of the site as well as a scheduled monument. To the south east of the site lies the Carbrooke Conservation Area which also includes several listed building.</p> <p>We welcome the specific reference to the nearest heritage assets in the policy.</p>	-
117- 121	MIN 202 Land south of Reepham Road, Attlebridge	-	No comments	-



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122-125	MIN 37 Frettenham and Buxton	-	No comments	-
130	MIN 64 Land at Grange Farm, Buxton Road, Horstead	Sound	<p>Although there are no designated heritage assets within the site boundary, there is a scheduled monument (Roman camp and settlement site) to the south of the site, grade II* listed All Saints Church to the east and scheduled monument Great Hautbois old church and grade II* listed Church of St Theobald's to the north east of the site. Any extraction at the site has the potential to impact upon the settings of these heritage assets.</p> <p>We welcome the specific reference to the nearest heritage assets in the policy.</p>	-
131-135	MIN 65 Land north of Stanninghall Quarry	Unsound	<p>Whilst there are no designated heritage assets within the site boundary, there are a number of designated heritage assets nearby including the grade II listed Horstead Lodge to the east of the site, the Coltishall and Horstead Conservation Area to the north east of the site (containing a number of listed buildings including the grade I listed Church of St John the Baptist), and a Roman Camp scheduled monument just to the north of the site. We have concerns regarding the potential impact on the setting of these various heritage assets.</p> <p>We understand that this site now has planning permission and to that end the principle of development has been established. Nevertheless, it is still important for the policy to set out an appropriate policy framework for the protection of the historic environment as the extant planning permission may not be implemented and an alternative application may be submitted.</p> <p>Whilst we broadly welcome criteria f and g of the policy, the policy would be improved by specifically referencing mitigation measures identified through the planning application process.</p>	Reference mitigation measures identified through the planning application process in the policy.
136-139	MIN 96 Land at Grange Farm	Unsound	Whilst there are no designated heritage assets within the site boundary, there are a number of designated heritage assets quite close by	We continue to recommend the preparation of a brief HIA prior to EiP

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	(between Spixworth Road and Coltishall Lane, Spixworth)		<p>including a cluster of grade II listed buildings at Grange Farm, a cluster at Spixworth Hall and Meadow Farmhouse, also grade II listed. The grade I Church of St Peter and Church of the Blessed Virgin and St Andrew and the grade I listed Priory, also scheduled, both lie within the Horsham St Faiths Conservation Area to the west of the site. Minerals extraction in this location therefore has the potential to affect the setting of a number of designated heritage assets.</p> <p>We note the proposed mitigation buffer to the south east boundary (shown on the map) of the site which is broadly welcomed. We do welcome criteria a, c and d.</p> <p>However, given our concerns regarding the impact on a number of nearby designated assets we recommended that a Heritage Impact Assessment is completed at this stage to assess the suitability or otherwise of the allocation and extent of the site and consider any mitigation that might be necessary should the site be found suitable from a heritage perspective. The findings of the HIA would then need to inform the policy and supporting text.</p> <p>Whilst we appreciate that the site is already allocated and that an application is due in 2023, we would still expect the preparation of a brief heritage impact assessment to inform the policy wording, particularly, in respect of potential mitigation for the site.</p>	to inform potential mitigation and enhancement measures which should then be incorporated into the policy wording.
141-144	MIN6 Land off East Winch Road, Mill Drove, Middleton, King's Lynn	Unsound	<p>We have no objections to the allocation of this site, which would have limited impact on designated heritage assets. However, the site will be for the extraction of carstone, a material that can be used for building stone purposes. Carstone is probably the most important building stone within the county and can be seen in historic buildings and structures of western Norfolk. It is largely quarried today for construction rather than conservation purposes, but it is essential that some extraction takes place for building stone uses and that minimal crushing of good quality carstone takes place for construction purposes.</p> <p>We note from the first paragraph that the carstone deposit in this site allocation is unsuitable for building stone use. We hope this has been</p>	We continue to recommend that an alternative site for building quality Carstone is identified.

Page	Section	Sound/ Unsound	Comments	Suggested Change
			<p>based on a thorough investigation of the deposit within the site and it can be clearly demonstrated that the mineral is of insufficient quality for conservation purposes. If the evidence is lacking, then Policy MIN 6 should include reference to the need for further investigation to establish the quality of the carstone deposit before extraction takes place. This might prevent good quality stone from being needlessly wasted.</p> <p>In our previous response we raised the issue of exploring the possibility of an alternative site for building stone be given that that this site is of insufficient quality for use as a building stone. It is important that such stone is available for historic conservation work and also for limited use in new build where using traditional building materials can be a helpful design tool in picking up on local vernacular, character and distinctiveness in sensitive design.</p>	
145-149	MIN206 Land at Oak Field, west of Lynn Road, Tottenhill	Sound	<p>The Tottenhill Row Conservation Area is located to the west of the site. Mineral extraction has the potential to impact upon the setting of the conservation area. However, there is already some former mineral extraction closer to the Conservation Area. The nearest listed building is over 1 km away.</p> <p>We welcome the specific reference to the nearest heritage assets in the policy.</p>	-
150-154	MIN 40 Land east of Grandcourt Farm, East Winch	Unsound	<p>We have previously raised concerns with this site in terms of the potential impact of on the significance and setting of the Grade II* listed church in East Winch, just 50 metres away. We welcome the inclusion of screening around the edge of the site allocation as shown on the Proposals Map, but there is no certainty that the impact on heritage assets will be properly considered.</p> <p>We appreciate that an application was submitted for this site in 2018 and whilst Historic England originally objected to the proposal in August 2018 we recommended that an appropriate restoration scheme should be agreed including restoring the land opposite the church to grassland.</p>	We suggest the deletion of the word <i>arable</i> in criterion k.

Page	Section	Sound/ Unsound	Comments	Suggested Change
			We note that criterion K does now refer to the field opposite the church must be restored to arable agricultural land which is welcomed. We suggest the removal of the word arable as pasture would also be acceptable.	
155-159	SIL01 Land at Mintlyn South, Bawsey	Unsound	<p>The boundaries of this area of search (AOS) are in close proximity of a number of heritage assets comprising the ruined parish church of St Michael (grade II*) and a font against the south façade of Whitehouse Farmhouse (GII).</p> <p>Other non-designated assets exist and include a series of crop marks related to undated ditches and banks together with a possible Bronze Age barrow.</p> <p>We welcome the reference in the supporting text to nearby heritage assets and the need to provide a heritage statement and LVIA to identify appropriate mitigation with any planning application. We welcome the reference to this in the policy. We also welcome the reference to archaeology requirements in the policy and supporting text.</p> <p>We welcome the reference to the listed church in the policy. We suggest that other listed structure, the font, is also referenced.</p>	Add reference to the font.
160-165	MIN 69 Land north of Holt Road, Aylmerton	-	No comments	-
166-170	MIN115 Land at Lord Ansons's Wood, near North Walsham	Sound	We welcome the reference in paragraph M115.3 and 115.5 to the nearby heritage assets and the need to provide a heritage statement to identify appropriate mitigation with any planning application. We welcome the reference to a heritage statement in the policy as well as reference to nearby heritage assets. We also welcome the reference to archaeology requirements in the policy and supporting text.	-
171-174	MIN 207 Land at Pinkney Field, Briston	Unsound	This site is located within the Glaven Valley Conservation Area. The nearest listed building is the grade II* remains of the church of St Peter and St Paul and the nearest scheduled monument is the Castle Hill	Reference mitigation measures identified through the planning application process in the policy.

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			<p>Medieval ringwork at Hunworth. We have concerns regarding this site given its location within the conservation area.</p> <p>We understand that this site now has planning permission and to that end the principle of development has been established. Nevertheless, it is still important for the policy to set out an appropriate policy framework for the protection of the historic environment as the extant planning permission may not be implemented and an alternative application may be submitted.</p> <p>Whilst we broadly welcome criteria e, f and g of the policy, the policy would be improved by specifically referencing mitigation measures identified through the planning application process.</p>	
175-179	MIN 208 Land south of Holt Road, East Beckham	Sound	<p>Whilst there are no designated heritage assets within the site boundary, there are a number of grade II listed buildings to the south of the site and the Upper Sheringham Conservation Area and Sheringham Hall registered park and garden lies to the north of the site.</p> <p>We welcome the reference in paragraph M208.3 - 208.5 to the nearby heritage assets and the need to provide a heritage statement to identify appropriate mitigation with any planning application. We welcome the reference to this in the policy including specific reference to heritage assets. We also welcome the reference to archaeology requirements in the policy and supporting text.</p>	-
180-184	MIN 25 Land at Manor Farm (Between Loddon Road and Thorpe Road), Haddiscoe	Unsound	<p>Whilst there are no designated heritage assets within the site boundaries, there are a number of grade I and grade II listed buildings in close proximity to the site. Of particular concern is the impact on the setting of the Grade I listed Church of St Mary, just 110m away and also the grade II listed White House Farm only 70 metres away. Whilst we note that indicative site buffers/screening are shown on the map, we are still very concerned at the potential impact of the proposed allocation on heritage assets.</p> <p>We note that the plan states that users of the road would not have views of the mineral extraction when viewing the church, but that is not the</p>	Prepare a proportionate HIA now ahead of the application and EiP to consider the suitability of the site and inform its extent and any potential heritage mitigation. The findings of the HIA would then need to inform the policy and supporting text.

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			<p>same as not affecting the setting. Setting impacts can are not just visual but can include noise, dust, vibration etc.</p> <p>Indeed, in relation to the previous application on this site we raised strong objections and we advised that <i>'In considering the contribution to the historic significance of the church made by its setting, it is clear that some harm will result from the proposed quarry, both during its period of activity and from the permanent change to the landscape.'</i></p> <p>Although we appreciate that unlike the previous application, the allocation is just to the north of the road. However, we continue to have concerns regarding the potential impact of the allocation on heritage assets.</p> <p>To that end we recommended that a Heritage Impact Assessment is completed at this stage to assess the suitability or otherwise of the allocation and extent of the site and consider any mitigation that might be necessary should the site be found suitable from a heritage perspective. The findings of the HIA would then need to inform the policy and supporting text.</p> <p>Whilst we appreciate that an application is due in late 2022, we would still expect the preparation of a heritage impact assessment to inform the policy wording in the Local Plan, particularly, in respect of potential mitigation for the site.</p> <p>We do welcome criteria a, b, g and h. In addition, we welcome the screening to the around the edge of the site as shown on the map extract.</p>	