



Historic England

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Our ref:
Your ref:
Date: 14 Jun 2017
Direct Dial: 01223 582747

By email to: Annette.Feeney@norfolk.gov.uk

Dear Ms Feeney

Ref: Norfolk Sand and Silica Examination in Public – Area of Search E

Thank you for consulting Historic England about the additional information provided by Norfolk County Council in respect of the allocation of Area of Search E (AOS E) as part of the Norfolk Sand and Silica Review. Having considered the further evidence provided by Norfolk County Council, Historic England maintains our representations in respect of the inclusion of AOS E. We will address some specific points raised in the paper below.

Historic England's request for more evidence

Norfolk's statement that we did not consistently ask at the early stages for further evidence and assessment in our earlier representations is incorrect. We have consistently stated through our advice that more evidence and assessment was required to justify the inclusion and, if included, size of AOS E. This can be found in our advice letters of 28 April 2015 and 29 July 2015, as well as more recent advice dated 23 June 2016 and 24 October 2016. Suitable evidence could be produced by means of a number of methodologies, including Heritage Impact Assessment or Historic Environment Characterisation. In our earlier letters, we did not illustrate our request for further evidence and assessment with specific methodologies. It is appropriate for Historic England to set out what evidence and justification is likely to be required. How this evidence is collected and presented is for the local authority to decide.

We agree that Norfolk has been subject to a Historic Landscape Characterisation. However, this high-level overview document does not address the specific concerns with regard to AOS E in sufficient detail.



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Representation 91602

This reference relates to an extract of a longer email sent by Mike Stubbs on his last day working for Historic England on 23 June 2016. Following on from our formal consultation response of the 23 June 2016, Mike was seeking to find a way forward with Norfolk and summarized the discussion in an email. He was clear that the contents of the email were both part of the public record but also a basis for further discussions between Norfolk and Historic England to resolve our submissions in respect of AOS E. Our subsequent consultation responses and correspondence with Norfolk documents our position as the plan evolved.

Norfolk County Council's Matter 2 Hearing Statement

The Council's Matter 2 statement sets out that up to 20 hectares is required from the Areas of Search. Areas of Search D, E, F, I, and J combined total c.1,000 hectares. AOS E is the largest proposed allocation. Historic England considers that an appropriate justification has not currently been made to include the highly sensitive historic landscape of AOS E and that the 20ha required could be found within Areas of Search D, F, I and J.

We note that in their Matter 2 statement Norfolk state that areas of search rather than preferred areas are appropriate because not enough information is present to identify Leziate beds. They go on to say: *"The methodology used for defining the Areas of Search has sought to remove those areas of the resource subject to the highest levels of constraints, so that they represent areas where planning permission may be granted subject to a suitable planning application."* This gets to the heart of our concern. Historic England considers it is likely that extraction works within a significant part of AOS E boundary as currently defined are likely to generate significant objections in terms of preserving and enhancing the historic environment. Allocating an AOS without sufficient evidence about the historic environment, could cause avoidable conflict within the planning system at a later stage.

Modification to Areas of Search Policy

We welcome Norfolk's commitment to make modifications to their policy to address our concerns.

The modification proposed in the paper is helpful but still does not address our fundamental concern about a lack of evidence and adequate justification to allow a fully informed allocation of AOS E. Therefore the allocation of AOS E remains unsound under the tests set out by the NPPF.

Conclusion

Whilst it is normally sufficient to follow the Council's proposed approach with AOS E, in this case, the evidence of the initial desktop study, the number and significance of heritage assets, the importance of their surrounding landscape, their group value and the high potential for significant impact leads us to the conclusion that further evidence and assessment is needed before identifying and defining this AOS.



In the absence of this evidence or suitable modifications to address our concerns, the justification for the inclusion of AOS E has not been made. Therefore, in the absence of a refined Area of Search and / or modifications to policy and / or supporting text, the most appropriate way forward at this stage would be the deletion of AOS E from the Plan.

Yours sincerely



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