

From: Eggeling, Alice
To: [Caroline Jeffery](#)
Cc: [redacted text](#)
Subject: RE: Norfolk Single Issue Silica Sand Review
Date: 31 January 2017 15:52:13
Attachments: [image89c2a4.JPG](#)

Dear Caroline,

Thank you for your comments which you have obviously given great consideration to. We are disappointed to note the responses but we appreciate that you have let us know your thoughts. Due to limited resources, we will not be attending the EiP but we will expect the inspector to take account of our comments and this on-going dialogue when considering the plan.

Best Regards,

Alice Eggeling

Historic Places Planning Advisor

Historic Places

Planning Group | East of England

[Redacted text](#)

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From: Jeffery, Caroline [Redacted text](#)
Sent: 27 January 2017 16:46
To: Eggeling, Alice
Cc: Drake, Richard
Subject: Norfolk Single Issue Silica Sand Review

Alice,

Following our telephone conversation last week about AOS E in the Silica Sand Review, I have compared the notes that I took during the telephone conversation with the existing Areas of Search Policy and I consider that all of the issues that you raised are already covered by the Areas of Search Policy and/or the supporting text to AOS E.

On this basis, we consider that no modifications are required to the Areas of Search Policy

or the supporting text. The issues discussed during the telephone conversation and my responses to them (in green) are detailed below:

1. Historic England is content with the wording of the policy for areas of search in general and its protection of the historic environment and archaeology.

Noted

2. HE have concerns about the principal of extraction within AOS E and would prefer a more detailed evidence base at the Local Plan stage. AOS E is part of the wider sensitive landscape that is in the centre of the scheduled monuments and listed buildings. Shouldham Warren is part of the medieval landscape. The SW corner of AOS E is the least problematic in terms of setting and historic landscape character. The potential impacts of a mineral extraction site (of less than 40 hectares) on the historic environment, within the 816 hectare area of search would vary depending on the location of the site. Therefore, as AOS E is an area of search and not a specific site we do not consider that additional evidence is appropriate at this stage because the size and location of a future mineral extraction site within AOS E is not currently known. Paragraphs E.3, E.4 and E.5 describe the historic environment of AOS E and highlight the constraints to mineral extraction due to the historic assets. Paragraph E.5 also includes information on parts of AOS E that are recommended to be avoided by mineral extraction.

The AoS Policy details the requirements for an archaeological assessment to be provided at the planning application stage and refers to the need for compliance with adopted Policy DM9. The AoS Policy also requires a Landscape and Visual Impact Assessment, including suitable mitigation measures to address any impacts and a Heritage Statement, to assess the potential for impacts and identify appropriate mitigation measures, to be provided at the planning application stage. The AoS Policy states that the mineral resource is present in a historically complex and significant environment. It also states that applications should consider the potential for early engagement with Historic England, the Norfolk Historic Environment Service and Conservation Officers.

We consider that the information contained in the Silica Sand Review addresses the concerns raised by Historic England and that the appropriate stage for more detailed evidence to be gathered is at the planning application stage.

3. You raised concerns that a developer could submit a planning application within AOS E that HE may object to and that the developer would not expect an objection to an application within an allocated area of search.

Areas of Search are defined as “areas where knowledge of mineral resources may be less certain but within which planning permission may be granted particularly if there is a potential shortfall in supply.” The definition of Areas of Search is different to Specific Sites which are defined as “where viable mineral resources are known to exist, landowners are supportive of minerals development and the proposal is likely to be acceptable in planning terms.” Therefore there is a notable difference in the certainty of whether land within an area of search will be granted planning permission, compared with land in a specific site. As stated in relation to point 4 below, the historic environment context of AOS E has been detailed in the

supporting text and the AOS Policy which we consider adequately flags up this constraint to developers.

4. AOS E is a critically sensitive historic environment and landscape is part of the significance of the historic environment and is a consideration of Historic England in the assessment of any planning application. This should be reflected in the AOS policy.

Paragraphs E.3, E.4 and E.5 of the Silica Sand Review detail the historic environment of AOS E. The AoS Policy states that the mineral resource is present in a historically complex and significant environment. It also states that applications should consider the potential for early engagement with Historic England, the Norfolk Historic Environment Service and Conservation Officers. The AOS Policy requires a Landscape and Visual Impact Assessment, Heritage Statement and Archaeological Assessment.

5. Developers need to be aware that potential impacts may not be able to be suitably mitigated. Developers need to be aware that mitigation needs to be appropriate and will need to satisfy HE that there isn't a significant impact to the historic environment.

The Areas of Search Policy states that a Landscape and Visual Impact Assessment will need to include suitable mitigation measures to address the impacts [on the historic environment] and manage change in ways that will best sustain heritage values. The Areas of Search Policy also states that the Heritage Statement will need to assess the potential for impacts and identify appropriate mitigation to sustain heritage values if required. The Areas of Search Policy refers to the adopted Archaeological Sites Policy DM9. Policy DM9 states that "development will only be permitted where it would not adversely affect the significance of heritage assets (and their settings) of national and/or regional importance, whether scheduled or not."

As stated in response to point 3, within the NPPG definition of areas of search there is a difference in the certainty of whether land within an area of search will be granted planning permission, compared with land in a specific site.

6. Planning applications will be considered in accordance with the historic environment and will need to satisfy Historic England that they are appropriate. Planning applications must be in accordance with the NPPF. Planning applications might be objected to by Historic England if they don't protect the historic assets.

Noted. The Areas of Search Policy states that development will be subject to compliance with national legislation, policy and guidance. We consider that the AoS Policy and the adopted Core Strategy and Development Management Policies are also compliant with the NPPF. We recognise that Historic England may object to planning applications if they don't protect historic assets. The AoS Policy advises applicants to undertake early engagement with Historic England.

7. Note that the areas of search are the least constrained areas, not that there are no constraints.

The supporting text to AOS E details the constraints relevant to this area of search and therefore the Silica Sand Review recognises the constraints and does not imply

that AOS E is not constrained.

Please let me know if you consider that I have missed out anything significant from our conversation.

Regards

Caroline Jeffery

Principal Planner (Minerals and Waste Policy)

Planning Services

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Community and Environmental Services Department

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