



Historic England

NORFOLK MINERALS SITE ALLOCATIONS DPD: SINGLE ISSUE SILICA SAND REVIEW

STATEMENT BY HISTORIC ENGLAND

AREA OF SEARCH (AOS) E

Statement following Hearing Session on Thursday 15 March 2017

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Introduction

In carrying out its statutory role in protecting and managing the historic environment Historic England gives advice to local planning authorities, including minerals and waste authorities, on certain categories of applications affecting the historic environment.

Historic England is consulted on local plan documents under the provisions of the duty to co-operate and provides advice to ensure that legislation, national policy in the National Planning Policy Framework are 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 in relation to the Norfolk Minerals Site Allocation DPD are made in the context of the requirements of the National Planning Policy Framework ("the NPPF") in relation to the historic environment as a component of sustainable development.

This statement addresses the Inspector's questions with regards to the soundness of Area of Search E (AOS E) and the need for Heritage Impact Assessment at allocation stage, rather than at planning application stage.

This hearing statement should be read alongside Historic England's comments submitted at previous consultation stages in March and October 2016 and our e-mailed correspondence with Norfolk County Council (three e-mails submitted at the Examination in Public given document references G60, G70 and G80).

Historic England's Duty to Co-Operate

Historic England seeks to work with Norfolk County Council and other stakeholders, to ensure an adequate supply of minerals which, it is recognised, may only be worked where they naturally occur. In responding to consultations on the plan, Historic England has worked with officers of Norfolk County Council to provide adequately worded policies against which planning applications may be assessed to ensure that operations will not have unacceptable adverse impacts on the historic environment.

Historic England has identified some concerns with regard to the methodology used to assess potential impacts to identify heritage assets, the wider historic environment and to select sites. However, we have worked with Norfolk to produce a positive framework of assessment for future applications where that has been possible.

It is against this positive context in addressing all other Areas of Search put forward by the plan, that we have expressed concern with regard to the designation of AOS E.

As was reiterated at the EiP, Historic England are content that Norfolk County Council has fulfilled its duty to co-operate in an appropriate way and that the Council and Historic England have reached a positive agreement in all matters other than how to proceed with AOS E.

AOS E – Historic Environment

AOS E is an area centred on Shouldham Warren. This area is significant with regard to the historic environment for two reasons:

- A well-preserved monastic Medieval landscape with high evidential, social and historical value
- An area of high archaeological potential

Medieval landscape

The wider area supported an unusually high number of medieval religious communities including several sites of female religious orders. Whilst broadly following the Nar Valley and its tributary streams, these various religious houses can be seen to be geographically grouped around the natural island of Shouldham Warren.

Shouldham Warren itself is a feature of Medieval origin, capitalising on the natural island formed between streams. This area is criss-crossed by paths which link the priories and is read as part of the wider Medieval landscape. The warren would have generated income for one or more of the religious communities, providing revenue from meat and fur. It is an important part of the Medieval farmed landscape.

As noted at the EIP, this wider landscape does not benefit from any direct designation but contributes value to the historic environment and should be considered an undesignated heritage asset. Where further assessment reviews the interrelationships between the Medieval sites within and around this landscape, a clearer understanding of the level of significance of Shouldham Warren and the wider landscape of AOS E may be made.

The landscape is also acknowledged to be of historic significance indirectly within the listing of individual designated assets as demonstrated in the extracts from the list descriptions of the following heritage assets:

- Scheduled Monument and Grade II listed Blackborough Priory. – *A Medieval Nunnery– Blackborough Priory is of interest as one of a group of seven monastic foundations of different orders and varying size located in or immediately adjacent to the Nar Valley, the two nearest being Augustinian priories at Wormegay, some 2.5km to the south west, and at Pentney, 3.5km to the south west.*
- Scheduled Monument and Grade II* Listed Marham Abbey – *A Cistercian Nunnery - The abbey has additional importance as one of a group of seven monastic foundations of different orders and varying size located in and immediately adjacent to the Nar valley, the two nearest being a Gilbertian double house for both monks and nuns at Shouldham, about 2.5km to the west and an Augustinian priory at Pentney, a similar distance to the north west*
- Scheduled Monument and Grade I Listed remains of Pentney Priory - *An Augustinian Monastery - The priory has additional interest as one of at least seven monastic foundations situated in or adjacent to the Nar Valley, of which two others, including the associated Wormegay Priory, were of the Augustinian Order.*
- Scheduled Monument – *Wormegay Priory – An Augustinian Priory - Wormegay Priory is the westernmost of six religious houses, including three foundations of the Augustinian order, located on either side of the River Nar, and is unique among them in being on an island in the fen. One of the other two Augustinian houses is the priory at Pentney, 4.75km to the east, with which it was eventually united. It is given additional interest by its proximity to the motte and bailey castle at Wormegay (1km south east), held by the Bardolph family, who were patrons of the priory.*

As demonstrated by the last extract, the religious houses did not occupy the landscape in isolation with many contemporaneous villages, churches, field systems, warrens and great houses, examples of which survive as some of the 35 listed buildings in close

proximity to AOS E, eight of which are Grade I or Grade II* listed (shown on the accompanying annotated map appendix I) together with eight Scheduled Monuments.

The collective experience of this dense concentration of heritage assets makes the area of high sensitivity and as noted, the landscape itself is a valuable and contributing part of the historic environment.

Archaeological Potential

Norfolk is internationally important in terms of surviving evidence of early human activity. The quality of land in the Nar Valley is such that there always is very high potential for settlement from the earliest periods. Archaeological remains from the Palaeolithic, Mesolithic and Neolithic periods are often concentrated along riverine environments and their associated sands and gravels. As such, these archaeological remains are vulnerable to substantial harm or complete destruction by minerals extraction.

This part of Norfolk is of special historic interest in that it has been continuously occupied from the earliest periods of human activity to the present day with settled communities from the Iron Age, Roman and Romano-British, Saxon, Danish, Norman and post-Medieval periods. For many of these early periods, activity was also often concentrated around riverine environments.

When reviewing flood maps of AOS E, provided within the draft DPD, it is noted that Shouldham Warren forms a natural island, a fact which would also likely have been exploited by early communities. As such, Shouldham Warren and the areas within the AOS to the immediate north and south, are likely to be of high archaeological potential. The small river valleys within the area are of value as part of the archaeological record and the setting informing the understanding of surviving remains.

Whilst archaeological potential does not necessarily conflict with the allocation of an AOS, it is important factor when considering the significance and likely historic value of locations within the AOS.

Sensitivity of the landscape

The heritage significance of the landscape and the interrelationships between individual historic elements is such that Historic England has great concern regarding the suitability of the area for designation as an AOS. There are few areas within the 823 hectare AOS that would not be located in an area of high sensitivity.

Unusually, Historic England request that because of the cumulative value of the landscape and the group value of the individual heritage assets, the allocation of the AOS should be fully informed by an understanding of the significance of the historic landscape and the relationship between individual assets, designated and undesignated.

If this detailed understanding to be provided identifying areas that may be of lesser significance or identifying areas that have a higher degree of tolerance to change, Historic England would seek to work with Norfolk County Council in the allocation of more a more focused AOS or Preferred Sites.

At present it appears that development within any part of the AOS could harm the significance of the Medieval landscape. As a result of the need to understand and protect the wider rural setting of the many designated heritage assets, it is reasonable to require the decision to allocate the AOS to be informed by an understanding of the potential impact to the historic environment. Accordingly, Historic England has requested a Heritage Impact Assessment at and an Historic Landscape Characterisation study at allocation stage.

Until such time as evidence has been provided to inform the decision, it is considered inappropriate to designate this area as an AOS.

Development Pressure

We understand that the extraction of silica sand is a water compatible extraction process. On the assumption that the extraction of silica sands might preferably be carried out in locations that are not prone to flooding, such sites may be considered to be more attractive to a developer than those which are of higher flood risk. Reviewing the flood maps within the draft DPD, it can be seen that only three locations are free from flood risk;

- The sensitive central landscape of Shouldham Warren,
- The area between Shouldham and Shouldham Thorpe Conservation Area and
- The land between Shouldham and Marham Priors.

All three of these areas are visually and archaeologically sensitive and Historic England has concern that these locations are likely to experience a high degree of development pressure.

Positive Planning Process

Whilst the detail of an application is usually considered at the planning application stage, minerals developers should have a reasonable expectation of the ability to achieve a positive planning application somewhere within an AOS, where appropriate assessment and mitigation are provided. At present, there is insufficient evidence for Historic England to be able to support an application for development within AOS E. Accordingly, it is our view that allocation of the AOS risks a situation where an AOS may not be able to provide positive planning outcomes. As the government's adviser on the historic environment, we would seek to avoid this as unnecessary, costly and of limited public benefit.

The allocation of an AOS is not a neutral designation, it would carry weight in the assessment of impacts of any application. Historic England takes seriously the duty to

facilitate this process but, cannot currently support the principle of minerals extraction within AOS E.

Unsuitability of assessment at application stage

The historic characterisation of the entire AOS and its interrelationships are considered important to understand before determining the suitability of extraction. The potential strategic significance and value of this landscape are of a scale that assessment is more appropriate at allocation, rather than detailed planning stage. This might reasonably be expected to be beyond the scope of any one single development proposal which would consider the immediate impact of works to the historic environment in a manner proportionate to the significance of the immediate landscape and the individual impacts of the planning application. This would potentially omit characterisation of the wider area, particularly where the landscape itself is not designated as a heritage asset.

As a result of the above concerns, Historic England have repeatedly requested that a Heritage Impact Assessment and Historic Environment Characterisation be carried out at allocation stage, so that the likely impacts of development coming forward within the area may be assessed at a strategic level. Where this assessment identifies areas within AOS E where it may be possible to extract silica sands without significant harm, then allocation as an AOS, or preferably as a preferred site, may be possible to support.

Conclusion

Based on the current evidence, Historic England are unable to support allocation of the AOS as any applications coming forward within it are likely to cause substantial harm to the historic significance of the landscape. Until such time as evidence suggests that applications can come forward without harm to this landscape or that parts or all of the landscape is not of significant historic value, Historic England cannot support the proposed AOS.