LAND EAST OF MEMORIAL HALL, BRUNDALL

APPEAL AGAINST REFUSAL OF PLANNING PERMISSION (LPA REF: 20171386)

PROOF OF EVIDENCE: HERITAGE

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APPEAL REF: APP/K2610/W/19/3239986
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1.0 INTRODUCTION

Experience

1.1 My name is Joanna Burton, I am a Heritage Director at Barton Willmore, a national planning and design practice. I have been instructed by Quantum Land (Brundall) Ltd ("the Appellant") to give independent expert evidence to this inquiry with reference to heritage matters raised by the proposed development at land known as Land East of Memorial Hall, Brundall ("the site").

1.2 I have over ten years’ experience in the heritage planning sector, including two years at English Heritage (former) before joining Beacon Planning Ltd, an independent planning consultancy specialising in the historic environment where I was promoted to Head of Heritage. I have been at Barton Willmore for nearly three years. I have an undergraduate degree in History from Durham University, a postgraduate Master of Philosophy degree in Medieval History from the University of Cambridge and a Master of Studies degree in Interdisciplinary Design for the Built Environment, also from the University of Cambridge.

1.3 I have been a full member of the Institute of Historic Building Conservation since April 2014 and currently sit on the Regional Branch Committee. I am a mentor for post-graduate students at the University of Cambridge Land Economy Department.

1.4 Throughout my career I have acted as expert witness to several planning inquiries on heritage matters. I have acted for appellants, a local planning authority and a Rule 6 party on schemes including the conversion of a Grade II listed building in Maidstone to foodstore and office use, and a tall building proposal on the Regent’s Canal in the London Borough of Tower Hamlets affecting multiple designated and non-designated assets and their settings.

1.5 My work as national heritage lead at Barton Willmore includes the provision of heritage advice to clients proposing development affecting a wide range of heritage assets. I regularly assess the significance of heritage assets, including the contribution made by their setting together with the impacts of proposed development.

1.6 I was not involved in this scheme prior to the lodgement of the appeal.
Declaration

1.7  The evidence which I have prepared and provide for this appeal reference APP/K2610/W/19/3239986 in this proof of evidence is true and has been prepared and is given in accordance with the guidance of my professional institution. I confirm that the opinions expressed are my true and professional opinions.

Background

1.8  As demonstrated by Figure 1: Site Context Plan in the document titled ‘Land East of Memorial Hall: Landscape and Visual Impact Assessment’ (July 2017) (hereafter ‘the LVIA’) (CD1.8), the Site is located in the northern part of Brundall, within an indent in the existing settlement pattern, such that the Site is bordered to the east, south and west by Brundall’s defined settlement limit.

1.9  The Site is bordered by:

- the Run Dike and the Norfolk Premier Golf Club to the north;
- Brundall Road, residential properties adjacent to Highfield Avenue and the Westfield Mission Church to the east;
- Residential properties adjacent to Westfield Road, Deacon Close, Meadow View and Links Avenue to the south; and
- Brundall Memorial Hall, playing fields, Public Right of Way (PRoW) FP2 to the west.

1.10 The application subject to this appeal is in hybrid form. Full permission is sought for Phase 1 (23 dwellings) and outline permission for up to 147 further dwellings, open space, and associated development. The description of development is:

“Outline planning application with the details of appearance, landscaping, layout and scale reserved for later determination, with the exception of Phase 1 for which details of all matters in relation to the 23 dwellings within that Phase are provided. Development to comprise: up to 170 dwellings (Use Class C3), and a community/sports pavilion (Class D1 and D2 use), a Country Park, formal and/or informal outdoor sports provision, access, and other earthworks and engineering works. All development, works and operations to be in accordance with the Development Parameters Schedule and Plans.”
1.11 This is referred to as the 'Proposed Development' throughout my evidence.

1.12 The only heritage asset alleged to be affected by the proposed development by Broadland District Council (hereafter BDC) is the Grade I listed Church of St Andrew and St Peter in Blofield. The church is located at a distance of approximately 1.15km from where the site boundary meets Links Avenue. The north-eastern corner of the site is the closest point to the church but retains a separation distance of over 400m from the red line boundary, with the proposed extent of built form as shown on dwg. 26007 07 Development Parameters Plan 2 Maximum Building Heights and Built Development Extents at a minimum distance of approximately 600m (CD2.19).

1.13 The Proposed Development was amended during the determination period to introduce a greater set back to the built development extent on the north-western corner (please see dwg. 26007 07 Development Parameters Plan 2 Maximum Building Heights and Built Development Extents CD2.19). The built development extent restricts built form to the south-eastern portion of the site, leaving a parcel to the west and corridor along the Run Dike as open space. Significantly for heritage matters, the layout retains a viewing corridor from the Memorial Hall and recreational land to the west in the direction of the Church of St Andrew and St Peter.

1.14 The retention of this corridor mitigates the perceived impact previously identified by the BDC Conservation Officer (Historic Environment) as set out at paragraph 4.7 of the Officer’s Report dated 10 July 2019 (CD3.1) (my emphasis added):

“*My previous concerns primarily related to the harm that the development would cause to the setting of the grade I listed church of St Andrew and St Peter in Blofield, by blocking and encroaching upon this view that is also protected through Policy 3 of the Brundall Neighbourhood Plan.*

*Amendments have been made to the footprint of the development to push it back slightly at its north-western corner. This should mean that the view of the church from the northern end of Links Avenue is no longer blocked by the development and will not encroach upon it to the same extent as it previously did when viewed from the Memorial Hall.*”

**Reason for Refusal**

1.15 BDC refused the hybrid planning permission despite a recommendation for approval from BDC Officers.
1.16 The Officer’s Report sets out the comments from the BDC Conservation Officer (Historic Environment) at paragraph 4.7. In these comments, the BDC Conservation Officer confirmed that the amended plans subject to this appeal would not give rise to a setting impact that would be harmful to the significance of the church: “although there will be some change to the setting of the church this will not be harmful”.

1.17 At paragraph 4.31, the Officer’s Report sets out the response from Historic England who in this instance deferred to the advice of BDC’s specialist officers.

1.18 In the Officer’s Report, the Case Officer appears to misinterpret the advice of the BDC Conservation Officer, equating the identified change to the setting as causing a degree of less than substantial harm at paragraph 5.76:

“The comments of the Councils [sic] Historic Environment [officer] on the appended application at 4.7 indicate that whilst there will be some change to the setting of the Church of St Andrew and St Peter, this will not be harmful and can be qualified as less than substantial harm.”

1.19 Nevertheless, the Case Officer found in the planning balance this less than substantial harm would be outweighed by the public benefit of the delivery of recreational open space, green infrastructure and linkages to existing rights of way (paragraph 5.114).

1.20 Notwithstanding the recommendation for approval and absence of any heritage objection from BDC specialist officers and statutory consultees, the application was refused at Planning Committee in part on historic environment grounds. The historic environment reason for refusal (reason for refusal no. 3) reads as follows (CD3.4):

“The development results in harm, albeit less than substantial harm, to the setting of the Grade 1 Listed Church of St Andrew and St Peter when viewed from the Memorial Hall and the public footpath connecting Links Avenue with Golf Links Road. The public benefits of the proposal are not considered to outweigh this harm and the proposal therefore conflicts with Policy 1 of the JCS, Policy 3 of the BNP and paragraph 196 of the NPPF.”

Scope of Evidence

1.21 This evidence deals with the heritage issues raised by BDC in the historic environment reason for refusal which alleges an impact on the Grade I listed Church of St Andrew and St Peter.
1.22 To my knowledge, BDC did not require any heritage assessment to be provided with the application at the time of submission. My scope of evidence will therefore include an assessment of heritage significance proportionate to the significance of the built heritage assets affected and the potential scale of impact. This is set out in Section 3.0.

1.23 My evidence has been informed by visits to the appeal site and Church of St Andrew and St Peter on 2 March 2020.

1.24 My evidence should be read in conjunction with that of Mr Robin Meakins (Planning Witness), Mr Matt Chart (Landscape Witness) and Mr Ian Roberts (Transport Witness).
2.0 HERITAGE DECISION-MAKING FRAMEWORK

2.1 Below is a summary of the relevant heritage decision-making framework with particular reference to listed buildings.

Legislation

Planning (Listed Buildings and Conservation Areas) Act 1990

2.2 Listed buildings are afforded statutory protection by the Planning (Listed Buildings and Conservation Areas) Act 1990 (the Act 1990).

2.3 Section 66 of the Act confers protection on the significance of listed buildings when determining planning applications. It requires local planning authorities or the Secretary of State to have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses in determining applications for development which affects a listed building or its setting.

The Development Plan

2.4 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that applications for planning permission be determined in accordance with the development plan unless other material considerations indicate otherwise.

2.5 For the purposes of this appeal, the development plan consists of:

- Joint Core Strategy for Broadland, Norwich and South Norfolk 2011/2014 (JCS) (CD4.3)
- Broadland Site Allocations Development Plan Document 2016 (SA DPD) (CD4.2)
- Broadland Development Management Plan Document 2015 (DM DPD) (CD4.1)
- Brundall Neighbourhood Plan 2016 (BrNP) (CD4.4)
- Blofield Neighbourhood Plan 2015 (BlnP) (CD4.5)

2.6 The key policies relevant to my evidence are:

- Policy 1 (Addressing Climate Change and Protecting Environmental Assets) (JCS)
- Policy 2 (Promoting good design) (JCS)
- GC1 (Presumption in Favour of Sustainable Development) (DM DPD)
- GC4 (Design) (DM DPD)
• Policy 3 (Important views) (BrNP)

2.7 ‘Policy 1: Addressing climate change and protecting environmental assets’ of the JCS guides, *inter alia*, that the built environment, heritage assets and the wider historic environment will be conserved and enhanced through the protection of buildings and structures which contribute to their surroundings and the protection of their settings.

2.8 ‘Policy 2: Promoting good design’ of the JCS is not referenced in the heritage reason for refusal but includes policies on respecting local distinctiveness, including the landscape setting of settlements and the historic environment, taking account of conservation area appraisals.

2.9 ‘Policy GC4 – Design’ of the DM DPD is again not cited in the heritage reason for refusal. Nevertheless, it guides that proposals should pay adequate regard to the environment, character and appearance of an area and reinforce local distinctiveness through careful treatment of space throughout the development, the appearance of the new development, scale and landscaping.

2.10 ‘Policy 3 (Important views)’ of the BrNP identifies the view specifically from the Memorial Hall towards the Grade I listed Church of St Andrew and St Peter as important. The location is indicated on Figure 4 of the policy document. The supporting text references views to the north east across agricultural land from the Memorial Hall community facility and path connecting Links Avenue and Golf Links Road towards the church.

2.11 The policy wording guides that the Plan seeks to protect and enhance the views to the north east from the Memorial Hall. The policy does not prohibit any development within these views, but provides that any development or alterations within these views must ensure that the key features of the view can continue to be enjoyed, including distant buildings.

**Other Considerations**

*National Planning Policy Framework (2019)*

2.12 The National Planning Policy Framework (hereafter the Framework) (CD9.1) sets out government planning policy. Part 16 sets out policies for conserving and enhancing the historic environment.

2.13 Paragraph 189 requires applicants to describe the heritage significance of any assets affected by the proposed development as follows:
“In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary.”

2.14 Paragraph 190 confers a similar duty on local planning authorities:

“Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset’s conservation and any aspect of the proposal.”

2.15 Paragraph 192 guides that local planning authorities, in determining planning applications, should take account of:

a) “the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;

b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and

c) the desirability of new development making a positive contribution to local character and distinctiveness.”

2.16 Paragraphs 193-202 provide guidance to assist with decision-making. These paragraphs reflect the statutory test at section 66 of the 1990 Act where applicable to listed buildings. Paragraphs of particular relevance include:

“193. When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset,
the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

194. Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:

a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;

b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.

195. Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

a) the nature of the heritage asset prevents all reasonable uses of the site; and

b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and

c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and

d) the harm or loss is outweighed by the benefit of bringing the site back into use.

196. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm
should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.”

2.17 Paragraph 200 deals with development within conservation areas, world heritage sites, and within the setting of heritage assets.

“200. Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.”

Planning Practice Guidance (2014 with updates)

2.18 Implementation of the Framework is supported by the Planning Practice Guidance (PPG). This was first published in 2014 and most recently updated on 23 July 2019 (CD8.32).

2.19 Paragraph 013 sets out further guidance on setting and how this should be taken into account.

Best Practice Guidance

Historic England Guidance Notes

2.20 Historic England’s Good Practice Advice (GPA) notes provide advice to local planning authorities, planning and other consultants, owners, applicants and other interested parties to support decision-making when managing change to the historic environment through the planning system.

2.21 GPA 2 ‘Managing Significance in Decision-Taking in the Historic Environment’ (2015) (CD8.30) provides information on good practice to assist local authorities, planning and other consultants, owners, applicants and other interested parties in implementing historic environment policy in the Framework and PPG. In particular, the document sets out useful information on assessing the significance of heritage assets, using appropriate expertise, historic environment records, recording and furthering understanding, neglect and unauthorised works, marketing and design and distinctiveness.

2.22 GPA 3 ‘The Setting of Heritage Assets’ (2017) (CD8.31) sets out guidance against the background of the Framework and the related guidance given in the PPG, on managing change
within the settings of heritage assets. This is provided with reference to the statutory obligation on decision-makers to have special regard to the desirability of preserving listed buildings and their settings and the policy objectives of the NPPF and the PPG in establishing the twin roles of setting: that it can contribute to the significance of a heritage asset and can allow that significance to be appreciated.
3.0 HERITAGE BASELINE

Methodology

3.1 Understanding the significance of heritage assets, including the contribution made by their setting, is important to understanding the potential impact of proposed development and in turn the acceptability of any proposals (PPG paragraph 007 Ref ID 18a-007-20190723, CD8.32). This provides the interpretation to paragraphs 189 and 190 of the Framework which require both applicants and local planning authorities respectively to describe and assess the significance of heritage assets affected by proposed development.

3.2 “Listed buildings” are those identified to be of “special architectural or historic interest” (Section 1[1], the Act 1990). In considering whether to add a building to the list, the Secretary of State may take into account not only the building but also any respect in which its exterior contributes to the architectural or historic interest of any group of buildings of which it forms part; and the desirability of preserving, on the ground of its architectural or historic interest, any feature of the building consisting of a man-made object or structure fixed to the building or forming part of the land and comprised within the curtilage of the building (Section 1[3], the Act 1990).

3.3 A “listed building” means a building which is for the time being included in a list compiled or approved by the Secretary of State and includes any object or structure fixed to the building together with any object or structure within the curtilage of the building which, although not fixed to the building, forms part of the land and has done so since before 1st July 1948 (Section 1[5], the Act 1990).

3.4 In planning policy terms, heritage significance is defined in Annex 2 of the Framework as:

“The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting.”

3.5 Archaeological interest is defined in Annex 2 of the Framework to be:

“There will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.”
3.6 Architectural, artistic and historic interest is defined in the PPG (Paragraph: 006 Reference ID: 18a-006-20190723):

“Architectural and artistic interest: These are interests in the design and general aesthetics of a place. They can arise from conscious design or fortuitously from the way the heritage asset has evolved. More specifically, architectural interest is an interest in the art or science of the design, construction, craftsmanship and decoration of buildings and structures of all types. Artistic interest is an interest in other human creative skill, like sculpture.

Historic interest: An interest in past lives and events (including pre-historic). Heritage assets can illustrate or be associated with them. Heritage assets with historic interest not only provide a material record of our nation’s history, but can also provide meaning for communities derived from their collective experience of a place and can symbolise wider values such as faith and cultural identity.”

3.7 Setting is defined in Annex 2 of the Framework as:

“The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.”

3.8 Historic England’s setting guidance document GPA 3 ‘The Setting of Heritage Assets’ (2017) (hereafter GPA 3) (CD8.31) provides guidance against the background of the Framework and the PPG on managing change within the setting of heritage assets. This is provided with reference to the statutory obligation on decision-makers to have special regard to the desirability of preserving listed buildings and their settings and the policy objectives of the NPPF and the PPG in establishing the twin roles of setting: that it can contribute to the significance of a heritage asset and can allow that significance to be appreciated.

3.9 GPA 3 makes clear that the setting of an asset cannot be definitively mapped or defined as the surroundings of an asset can change over time. Setting is not itself an asset; its importance is derived from what it contributes to the significance of the heritage asset or to an ability to appreciate that significance. This contribution can be positive, negative or neutral.
3.10 Whilst setting is not purely a visual consideration, views can form a key part of setting. Paragraphs 10-13 of GPA 3 provides further assistance in understanding the contribution made by views. It guides that those views that contribute more to understanding the significance of an asset include, *inter alia*: those where the composition of an asset within the view was a fundamental aspect of design or function; those where town- or village-scapes reveal views with unplanned or unintended beauty; those with historical associations (such as viewing points and the topography of battlefields); those with cultural associations and those that have become historically cherished; and those where relationships between assets or natural features or phenomena are particularly relevant.

3.11 The guidance makes an important distinction between the analysis of setting and landscape assessment at paragraphs 14-16. At paragraph 14 the guidance states:

“While landscapes include everything within them, the entirety of very extensive settings may not contribute equally to the significance of a heritage asset, if at all. Careful analysis is therefore required to assess whether one heritage asset at a considerable distance from another, though intervisible with it – a church spire, for instance – is a major component of the setting, rather than just an incidental element within the wider landscape.”

3.12 It goes on to provide further guidance to assist with dealing specifically with church towers and spires in recognition of their potentially extensive visibility:

“Being tall structures, church towers and spires are often widely visible across land- [sic] and townscapes but, where development does not impact on the significance of heritage assets visible in a wider setting or where not allowing significance to be appreciated, they are unlikely to be affected by small-scale development, unless that development competes with them, as tower blocks and wind turbines may. Even then, such an impact is more likely to be on the landscape values of the tower or spire rather than the heritage values, unless the development impacts on its significance, for instance by impacting on a designed or associative view.” (GPA 3, page 7)

3.13 Part 2 of GPA3 seeks to establish a staged approach to proportionate decision-taking comprising five assessment steps:

- Step 1: Identify which heritage assets and their settings are affected
• Step 2: Assess the degree to which these settings and views make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated
• Step 3: Assess the effects of the proposed development, whether beneficial or harmful, on the significance or on the ability to appreciate it
• Step 4: Explore ways to maximise enhancement and avoid or minimise harm
• Step 5: Make and document the decision and monitor outcomes

3.14 My assessment of significance follows the heritage interest approach to significance set out in the Framework using the definitions reproduced above from Annex 2 of the Framework and the PPG. The methodology for determining significance is based on desk-top research together with fieldwork to inform a professional judgment against the heritage interests. The methodology for understanding the contribution made by setting has been informed by the guidance set out in GPA 3.

Heritage Baseline

Scope

3.15 There are no designated or non-designated heritage assets within the site.

3.16 The site does not form part of a conservation area or other such larger designated asset.

3.17 On the basis of the above, there is no direct physical impact on any above ground heritage assets.

3.18 I have undertaken an online search of the Norfolk Historic Environment Record via the Heritage Gateway website¹ and Norfolk Explorer website². This did not identify any potential non-designated built heritage assets within site.

3.19 Impacts on heritage assets can extend to the contribution made by their settings. Step 1 of GPA 3 requires the identification of any heritage assets with potential to be affected by development within their setting.

3.20 A desk-top search of the National Heritage List for England via the Historic England website³ identifies 19 listed buildings within approximately 1km of the site boundary (Figure 1, LVIA,

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¹ Heritage Gateway [online] <https://www.heritagegateway.org.uk/gateway/>.
CD1.8). These are concentrated in Brundall to the south and Blofield to the northwest of the site.

3.21 The only heritage asset alleged by BDC to be impacted by the appeal development is the Grade I listed Church of St Andrew and St Peter (list entry number 1304595). Through desk-top assessment and fieldwork I concur that this is the only asset which needs to be assessed. The scope of my setting assessment is therefore focussed on the single asset of the Grade I listed Church of St Andrew and St Peter.

3.22 The Church of St Andrew and St Peter was first listed on 25 September 1962 at Grade I. The list description is CD8.29. The record in the ‘Norfolk Heritage Explorer’ is reproduced as Appendix 1.

**Statement of Significance**

3.23 As a Grade I listed building the Church of St Andrew and St Peter is a heritage asset of the 'highest significance' (paragraph 194 of the Framework).

3.24 The Statement of Common Ground describes the special architectural and historic interest as follows:

“The architectural and historic significance of the church lies in it being a good example of medieval perpendicular style and the level of intactness of its architectural form with significant features such as the font, monuments, the dado remains of a rood screen and stained glass.”

**Heritage interests**

3.25 As set out above, the Framework establishes a heritage interest approach to understanding significance based upon archaeological, architectural, artistic and historic. This approach helps to elucidate the special architectural and historic interest. The significance of the asset is considered below with reference to these interests.

3.26 The earliest fabric in the church dates to the 14th century with later additions, notably including the 15th century four stage tower. The extent of survival of late medieval fabric lends the church a degree of archaeological interest by virtue of aiding an understanding of the original construction and its later adaptation. Such buildings are, however, well represented nationally
together with extensive other material culture from the medieval period such that it forms part of a much more extensive evidence base documenting past human activity from this period.

3.27 The church is of exceptional architectural and artistic interest, documenting the Perpendicular style of English Gothic architecture that flourished in ecclesiastical buildings from the mid-late 14\textsuperscript{th} century to the middle of the 16\textsuperscript{th} century (Appendix 2 Photos 1-2). It is constructed from flint with stone dressings in the Norfolk tradition. Its form comprises a nave and chancel, with north and south aisles, a west tower and north porch, with a north boiler house and a south vestry. The traceried windows and doorways are generally in the Perpendicular style, reflecting the 14\textsuperscript{th} century date of the original construction and major additions in the 15\textsuperscript{th} century. The tower is in four stages with flushwork on the buttresses, polygonal stair turret and battlemented parapet.

3.28 The artistic interest is concentrated in the interior which displays fine examples of craftsmanship and decoration, including a rood screen base with painted saints, bench ends with carved poppy-heads and a 15\textsuperscript{th} century font decorated with scenes from the life of Christ. Further artistic works are found in the funerary monuments in the chancel and north aisle which include a mid-17\textsuperscript{th} century monument in carved alabaster commemorating Edward Paxton and his nine children.

3.29 In summary, the church is of exceptional architectural and artistic interest as an example of the Perpendicular style with medieval, post-medieval and later artistic decorative and commemorative works of craftsmanship.

3.30 The church is of a considerable size and status, with one of the tallest towers in Norfolk. This marks its importance to the medieval community of Blofield and is illustrative of the importance of religion within the social and economic fabric of medieval communities and those that followed. It also stands as testament to the prosperity of medieval Blofield, a community that was made rich by the wool trade. The church replaced an earlier Norman structure, recorded in the Domesday Book of 1088 as ‘Blafelda’ and comprising 671 households, placing it within the largest 20\% of settlements recorded in the survey.\footnote{Open Domesday [online] \texttt{<https://opendomesday.org/place/TG3309/blofield/>} Accessed 10 March 2020.}

3.31 The commemorative plaques and funerary monuments document past individuals of status within the parish. This commemorative tradition has extended through to the 20\textsuperscript{th} century with stained glass documenting the life of Margaret Harker, a former director of the Norfolk Red Cross.
3.32 The church is therefore of exceptional historic interest, giving evidence for past lives, communities and events from the mid-late medieval period to the present day.

Contribution made by setting

3.33 Assessment Step 2 of GPA 3 requires an assessment of the degree to which the setting and views contribute to the significance of the asset or allow an appreciation of that significance. The guidance provides a series of visual and non-visual attributes that can contribute to an understanding of ‘the setting’. Not all attributes are necessarily relevant. These are considered below following the headings used in GPA 3.

The asset’s physical surroundings

3.34 The church’s immediate surroundings are characterised by the churchyard in which it is located (Appendix 2 Photo 3). The churchyard is bounded to the road on its northern edge by a flint wall with lych gate lined with mature trees. The churchyard is bounded along its other boundaries by mature planting, all of which create a sense of enclosure and clearly delineate the churchyard from the public realm. The churchyard itself is characterised by greenery, creating an open setting within the confines of its boundary. The churchyard is thus a well-defined open space of a specific and recognisable character that is the expected setting of a church, immediately signalling its use. In this sense, the churchyard forms an intended element of the setting, sharing an important functional and associative relationship with the principal building and one that makes a great contribution to its significance.

3.35 The church is situated within the village of Blofield, with 20th century development to the west and a cluster of earlier development to the east as shown on the 1887 1:10,560 Ordnance Survey Plan (Appendix 3). The rectory that historically served the church is located on the opposite side of Church Road to the north. The core of the village by the late-19th century was located to the north of the church along Yarmouth Road. 20th century development has extended the settlement further south, with development along Stocks Lane and Brundall Road to the west and Church Road to the east with the effect of integrating the church into the built form of the village (1975 1:10,000 Ordnance Survey Plan, Appendix 3). Nevertheless, the church retains a peripheral relationship by virtue of the open aspect to the south.

3.36 The church shares a close relationship with the villagescape of Blofield. The site by contrast is located on the periphery of the historic core of Brundall, a separate, neighbouring settlement to the south with its own church (St Lawrence). The site therefore shares no historic or functional relationship with the Church of St Andrew and St Peter.
Experience of the asset

3.37 At close quarters, the immediate setting of the church is defined by its churchyard which creates a quiet, contemplative setting that complements and is important to understanding and experiencing the ecclesiastical use and architecture of the building.

3.38 Although the land to the south is open, the planting along the southern boundary of the churchyard prevents views outwards, giving the churchyard an enclosed character (Appendix 2 Photos 3 and 6). Views to the site from the church at ground level are not therefore possible, even in winter. The site therefore makes no contribution to an experience of the asset at close range.

3.39 The church is experienced as part of the village of Blofield which aids an understanding of the asset as a rural parish church (Appendix 2 Photos 4 and 5). Despite its size, it has limited prominence within the villagescape being generally screened by the topography and built form. From within the village it is perhaps best experienced travelling from the junction of Church Road, Brundall Road and Stocks Lane to the west from where the scale of the west tower can be fully appreciated (Appendix 2 Photo 5).

3.40 The topography and built form of the village is such however that from further afield there are views towards the church tower. As expressions of religious devotion and significant buildings within the community, rural parish church towers were generally intended to be prominent structures visible at distance. The height of the example at Blofield was also likely an expression of the status and wealth of this community. This visibility potentially creates an extensive setting.

3.41 Paragraph 14 of GPA 3 makes a clear distinction between the analysis of setting and landscape assessment in such instances where heritage assets have extensive settings. It specifically cites church spires as an example where careful analysis is required to assess whether one heritage asset at a considerable distance from another is a major component of the setting or an incidental element within the wider landscape. In this instance, the analysis required is not with reference to intervisibility between assets but rather views to the asset; the principle set out in the guidance is considered relevant.

3.42 The prominence of the church tower is general to the surrounding landscape; it is not in relation to any individual wider views of designed importance. As a result of its height and location on higher ground, there are such incidental views to the tower to the west of Blofield on the approach along Yarmouth Road where it can be seen rising above the golf course (LVIA Figure 5 Site Context Photograph 11, CD1.8). It is also visible in north-easterly views from
PRoW Brundall FP2 (LVIA Figure 5 Site Context Photograph 1, CD1.8). Views are also permitted from the northern end of Links Avenue (LVIA Figure 5 Site Context Photograph 2, CD1.8) across the site itself and along the eastern portion of PRoW Brundall FP1 where it travels along the southern boundary of the site.

3.43 In these views, the church tower is seen at considerable distance across extensive open space that is generally either agricultural in character, or more intentionally landscaped (the golf course). The detailed architectural and artistic interest of the building cannot be appreciated or experienced in these longer views. What can be appreciated is an understanding of the asset as a rural parish church located within the village of Blofield.

3.44 Notwithstanding the above, the rural quality of the view from the site has been partially eroded as a result of the urban expansion of both Blofield and Brundall which has introduced modern development into the wider setting.

3.45 The view to the church from the Memorial Hall has been specifically protected through Policy 3 (Important views) of the BrNP. The supporting text also makes reference to views from the footpath linking Links Avenue and Golf Links Road. Whilst I acknowledge that the church tower is a prominent feature, this is not a viewpoint that was intended to be of any particular importance over and above other incidental views across the landscape in which the tower is similarly visible.

3.46 The terminus of Links Avenue that gives rise to this view is not of any historic importance relative to the church, being the result of the 20th century development of the first memorial hall and its later replacement together with the neighbouring 20th century residential expansion of Brundall. This development shares no historic relationship with the church and vice versa; being (considerably) later development, the church tower was not designed specifically with the composition of this view in mind.

3.47 In addition, when compared against the attributes set out in paragraph 11 of GPA 3 and summarised in paragraph 3.10 above, it is not a viewpoint that makes an increased contribution to the significance of the asset over and above other examples.

3.48 I conclude therefore that this view is not a major component of the setting, but rather the tower appears as an incidental element within the wider landscape.

Summary

3.49 In summary, the greatest contribution that the setting makes to an understanding and appreciation of the special architectural and historic interest of the Church of St Andrew and
St Peter is made by its immediate setting comprising the churchyard and extending to the villagescape along Church Road.

3.50 The site shares no historic associative or functional relationship with the church, therefore any contribution it makes to its significance would be by virtue of visual attributes of setting. With regards to intervisibility, the site is not visible from within the churchyard and therefore has no bearing on an experience of the asset at close quarters which is where its architectural and artistic interest can be best appreciated. The church is however intended to have a wider visual setting and can be seen from the site. The open character of the site permits views to the asset that contribute to an understanding of the building as a high status, rural parish church. These views are incidental and make no more important contribution than other views gained from nearby vantage points.
4.0 HERITAGE IMPACT ASSESSMENT

4.1 Step 3 of GPA 3 provides a methodology for assessing potential impacts on the setting of heritage assets, whether beneficial or harmful. Assessing the potential scale of impact is an exercise of professional judgment, applying an understanding of the effects of the development on the significance of the heritage assets established in the baseline condition. This is set out below following the headings in GPA 3.

Impact Assessment

Location and siting of development

4.2 The site is located on the periphery of Brundall and forms part of a neighbouring settlement to Blofield in which the heritage asset is located. At its closest the proposed built form is situated c.600m from the church; and from the identified view from the Memorial Hall this extends to over 1km. By virtue of the distance alone, the impacts of the Proposed Development, restricted to a maximum of 11m in height from finished ground level (dwg. 26007 07 Development Parameters Plan 2 Maximum Building Heights and Built Development Extents, CD2.19), would not have a significant visual impact. This is notwithstanding that the site is not visible from within the churchyard. The location and siting of development together with the proposed maximum height is such that there will be no change to an experience of the asset at close quarters where its architectural and artistic interest can be best appreciated. Those elements of the setting that make the greatest contribution to the significance of the asset will therefore remain unchanged.

4.3 The Proposed Development will be visible in the view from the northern extent of Links Avenue. To mitigate any potential impact, the parameters have been amended in response to comments from the BDC Conservation Officer (Historic Environment) to leave a viewing corridor to the church tower (dwg. 26007 07 Development Parameters Plan 2 Maximum Building Heights and Built Development Extents, CD2.19). The BDC Conservation Officer confirmed that this amendment was adequate to mitigate any potential harm to the significance of the asset (cited at 1.16 above).

4.4 I acknowledge that this view to the church will change with the appearance of residential form within the field of vision. This will comprise a partial erosion of the rural character of the foreground of the view with the change from agricultural land to residential built form. However, as demonstrated by dwg. 26007 09 Development Parameters Plan 4 Recreational Zones (CD2.19), a view to the church tower from the Memorial Hall across informal outdoor space and county park beyond will be retained. The church tower will be viewed across high
quality landscaping as set out in Section 8 of the Design and Access Statement (CD2.19), capable of being secured through the appropriate use of planning conditions and/or at the reserved matters stage. This will sustain the attributes of setting that contribute to the church’s significance, namely an ability to appreciate the scale and status of the church seen at this distance and its position within the rural settlement of Blofield across the valley.

4.5 Moreover, this viewpoint has not been identified to be any more sensitive than others. There are numerous other viewpoints that offer an appreciation of the same attributes that will be unaffected by the proposed development. These include views from the open space retained within the site, for example along the Run Dike and to the west of the Memorial Hall, views from the site’s northern boundary, views from PRoW Brundall FP2 and views from Yarmouth Road.

4.6 I acknowledge that the development will encroach on views permissible from the footpath along the southern site boundary. These views are not available across the length of this footpath. The retention of the view from the Memorial Hall will permit an appreciation of the church from this aspect such that an ability to appreciate the church from this location will not be lost.

Form and appearance of development & Wider effects of the development

4.7 Matters of scale have been fixed with parameters restricting the height of development to a maximum of 11m from finished ground level. This will ensure that the Proposed Development does not compete with the prominence of the tower in longer range views across the landscape.

4.8 The land use of the site will change from agricultural land to residential development with significant areas retained as open space. Given its distance from the church, the site forms a small part of a much larger wider setting, the vast majority of which will remain unaffected. The scale of development proposed is not considered to result in a fundamental change to the wider character of the setting as a whole.

4.9 This assessment is informed by the guidance in GPA 3 that notes that small scale development that does not compete with towers (such as tower blocks or wind turbines) are unlikely to impact the significance of assets visible within a wider setting (CD8.31, page 7).

Permanence of the development

4.10 It is acknowledged that this is a permanent form of development, hence care has been taken to mitigate the impacts on the church through design. The reserved matters stage on the outline elements offers further opportunity to control detailed matters of design across the
larger portion of the developable area to ensure that this is a high-quality development that reinforces local distinctiveness where seen in conjunction with the church, and to design the public open space to ensure it provides a green and open foreground in the retained view to the church from Links Avenue.

Conclusions

4.11 It is important that an assessment of impact is based upon an understanding of the attributes of setting, to distinguish between change and harm, and to understand whether the change is a change to the landscape character or to heritage values. I acknowledge that the Proposed Development will affect a change to the character of the setting in the discrete location of the site; in the light of guidance at paragraph 14 of GPA 3 my assessment has sought to understand whether this change would affect the special interest of the Church of St Andrew and St Peter.

4.12 My assessment has determined that those setting attributes that contribute positively to the significance of the asset will remain unchanged. There will be no change to the experience of the asset at close quarters. In the view from Links Avenue – a view not of any particular significance in the context of the setting of the asset – even with the introduction of development within the periphery of this view, there will be no diminishing of an ability to understand and appreciate the Church of St Andrew and St Peter as a high-status ecclesiastical building serving the rural settlement of Blofield.

4.13 In my professional judgment, for the reasons as set out above, the Proposed Development will not have any adverse impact on the special interest of the Church of St Andrew and St Peter.

4.14 This finding is supported by the consultation response from Historic England set out at 4.17 of the Committee Report which deferred to the specialist officers of BDC. Whilst this does not confirm that the Historic England Officer found no adverse impact, at worst it strongly suggests that Historic England did not find an impact that warranted comment.

4.15 With Historic England having deferred to the advice of BDC's internal historic environment consultee, the BDC Conservation Officer confirmed that whilst the Proposed Development would affect a change to this view, this is not a change that would result in a material adverse impact. I concur with this assessment.

4.16 It is important to make the distinction between a change that would have a neutral (or beneficial) impact, and a change that would have a harmful impact. The PPG is clear that proposed development may have no impact on an asset's significance (or enhance it) and in this scenario would cause no harm (paragraph 018 Reference ID: 18a-018-20190723 CD8.32).
4.17 The Case Officer appears to have misinterpreted the specialist advice of the BDC Conservation Officer by equating the change to a degree of less than substantial harm. This is in clear conflict with the specialist advice of the Conservation Officer providing the specialist advice in line with the guidance in paragraph 190 of the Framework, and the guidance in the PPG which confirms that change is not by default harmful.

**Assessment Against the Decision-making Framework**

4.18 A full assessment against the Development Plan and other material considerations is undertaken in the Planning Witness’s evidence. I set out below an assessment specifically against those historic environment policies (except where the planning balance is required in which event I defer to the expert evidence of the Planning Witness).

4.19 By virtue of my finding of no harm, the proposals are considered to be in accordance with the objectives of ‘Policy 1: Addressing climate change and protecting environmental assets’ of the JCS which guides, *inter alia*, that the built environment, heritage assets and the wider historic environment will be conserved and enhanced through the protection of buildings and structures which contribute to their surroundings and the protection of their settings.

4.20 For the same reason, the Proposed Development is considered to meet the requirements of ‘Policy 2: Promoting good design’ of the JCS and ‘Policy GC4 – Design’ of the DM DPD through respecting the historic environment.

4.21 ‘Policy 3 (Important views)’ of the BrNP identifies the view from the Memorial Hall towards the Grade I listed Church of St Andrew and St Peter as important. The Policy wording guides that the Plan seeks to protect and enhance the views to the north east from the Memorial Hall. The policy does not prohibit any development within these views, but provides that any development or alterations that does occur within these views it must be ensured that the key features of the view can continue to be enjoyed, including distant buildings.

4.22 The BDC Conservation Officer was satisfied that this offset would be sufficient to avoid any adverse impact. My analysis above has demonstrated how, with the amended Parameter Plan, the Proposed Development will ensure that the view to the church as a distant building will continue to be enjoyed from this location.

4.23 It is also worth noting that this retained view will only have peripheral development visible on its eastern edge, leaving a large swathe of the site as green open space with public access from which views to the church will be able to be enjoyed. This includes the proposed country park along the Run Dike from which views to the church tower can be gained.
4.24 By virtue of sustaining the significance of the listed building, the Proposed Development meets the objectives of Chapter 16 of the Framework, including specifically paragraph 192 which highlights the desirability of sustaining heritage assets and paragraph 200 which guides that proposals that preserve elements of setting that make a positive contribution to the asset should be treated favourably. On this basis, there is no requirement to engage the test at paragraph 196 of the Framework (or indeed at paragraph 195).
5.0 REASON FOR REFUSAL NO. 3

5.1 In refusing the application, BDC found a degree of less than substantial harm to the setting of the Grade I listed Church of St Andrew and St Peter when viewed from the Memorial Hall and the public footpath connecting Links Avenue with Golf Links Road. BDC’s Statement of Case elaborates at paragraph 4.11 that the Proposed Development will "further urbanise the area and further erode the wider rural setting of the church and this will consequently result in a harmful impact on the wider rural setting of the listed church."

5.2 At its closest, the extent of built form is still some 600m from the church; on this basis it could not be considered to encroach upon its rural setting to the degree that this would adversely impact its significance. Fundamentally, the rural setting of the church, situated at over half a kilometre from the closest built form, will remain rural in character.

5.3 The wording of the reason for refusal alleges a localised impact on the specific viewpoint from the Memorial Hall and views from PRoW Brundall FP1. I have considered the view from the Memorial Hall and conclude that, whilst there will be some erosion of the wider rural character of this view, the visibility of the church as a distant building will be able to be enjoyed and its status will still be appreciable.

5.4 I acknowledge that views to the church will become screened as one travels eastwards along PRoW Brundall FP2 to Golf Links Road. Like the view from the Memorial Hall, this is not a vantage point of any particular heritage significance. Moreover, the tower will remain prominent from many other viewpoints, including large areas within the site retained as open space that will become publicly accessible. Finally, the church tower becomes screened towards the eastern end of the footpath such that the church is not visible across the length of this footpath regardless of the Proposed Development.

5.5 On this basis, I do not consider that the loss of the visibility of the church tower from a stretch of this footpath when taken in the context of the wider setting of the church would have an impact on an ability to understand and appreciate its special interest.

5.6 As highlighted in GPA 3, care needs to be undertaken to establish the difference between landscape assessment and setting. Paragraph 14 states: "While landscapes include everything within them, the entirety of very extensive settings may not contribute equally to the significance of a heritage asset, if at all" (CD8.31). On the basis of the above, the Proposed Development is not considered to impact a major component of the extensive setting of the church.
5.7 BDC acknowledge at paragraph 4.11 of their Statement of Case that the rural setting of the church has already been denuded, that there will be no direct impact on the church and that its immediate setting will be unaffected. On this basis, it concludes that the degree of harm "can be considered at the low end of less than substantial."

5.8 I would add to this further mitigating factors, including the distances of the Proposed Development as cited above, the retention of the view from the Memorial Hall and the creation of newly publicly accessible vantage points from which the church will be able to be seen. Furthermore, BDC’s own Statement of Case places much of the special interest on features that are experienced from the interior of the building, citing the font, monuments, dado remains of a rood screen and stained glass. These are all features of significance that would not be affected by setting impacts.

5.9 Whilst I disagree that the proposals would result in harm, were any harm to be found (contrary to my judgment), these factors in combination would have to place it at the very bottom end of less than substantial (i.e. negligible harm).

5.10 Whilst I acknowledge that the Framework guides that if there is harm caused then great weight must be given to the conservation of designated heritage assets, irrespective of whether this is substantial or less than substantial, the public benefits to be weighed in the balance as per paragraph 196 would need to be sufficient only to outweigh a very modest degree of harm. This exercise is undertaken by the Planning Witness. However, as set out in my analysis above, my judgment is that there would be no harm caused, and therefore paragraph 196 would not be engaged.
6.0 SUMMARY AND CONCLUSIONS

6.1 This chapter sets out my conclusions and should be taken as the summary proof.

6.2 This evidence deals with the heritage issues raised by BDC in the heritage reason for refusal which alleges an impact on the Grade I listed Church of St Andrew and St Peter. There are no other heritage assets with potential to be affected.

6.3 As a Grade I listed building, the 14th century Church of St Andrew and St Peter an asset of the highest significance. Its significance is derived chiefly from its architectural and artistic interest as an example of the Perpendicular style with medieval, post-medieval and later artistic decorative and commemorative works of craftsmanship, and its historic interest in giving evidence for past lives, communities and events from the mid-late medieval period to the present day.

6.4 The greatest contribution that the setting makes to an understanding and appreciation of the special architectural and historic interest of the church is its immediate setting comprising the churchyard and extending to the villagescape along Church Road. The site shares no historic associative or functional relationship with the church, therefore any contribution it makes to its significance would be by virtue of visual attributes of setting.

6.5 The site is not visible from within the churchyard and therefore has no bearing on an experience of the asset at close quarters which is where its architectural and artistic interest can be best appreciated. The church is however intended to have a wider visual setting and can be seen from the site. The open character of the site permits views to the asset that contribute to an understanding of the building as a high status, rural parish church. Whilst these views do make a positive contribution, these are incidental and make no more important contribution than other views gained from nearby vantage points.

6.6 Notwithstanding the above, the parameters of the Proposed Development have been amended so that the view from the Memorial Hall identified in Policy 3 of the BrNP view will be retained in full through a corridor of green open space. This design change was considered by the specialist officer at BDC to successfully mitigate any potential impact on the listed building. Historic England was consulted and reviewed the application, and having done so chose to defer to the advice of the BDC conservation team. No adverse heritage impact has therefore to date been identified by historic environment planning specialists. Indeed, BDC did not seek a Heritage Statement as part of the submission documents, such is the lack of sensitivity of the site relative to the historic environment constraints.
6.7 I likewise find no adverse heritage impact. On this basis, I consider that the Proposed Development preserves the special interest of the asset, thereby meeting the objectives of Policy 1 of the JCS, Policy 3 of the BrNP and Chapter 16 of the Framework. In the event that a material adverse impact is found, given the scale of development relative to the extensive setting of the asset together with the localised nature of the impact, this would have to be at the lowest end of the scale of less than substantial harm (i.e. negligible harm). The evidence provided by the Planning Witness demonstrates that in this scenario, the public benefits would weigh favourably in the planning balance.

6.8 I therefore respectfully conclude that the Church of St Andrew and St Peter is not a constraint preventing the successful determination of this appeal.
APPENDIX 1

Norfolk Heritage Explorer Church of St Andrew and St Peter Entry
Record Details

NHER Number: 10265
Type of record: Building
Name: SS Andrew's and Peter's Church, Blofield

Summary

A very large church dedicated in 1427. Restorations in 1880 are reported as finding Norman work. The style is generally early Perpendicular although the clerestory is Decorated. Inside is a 15th century font that depicts scenes from the Life of Christ and a monument dated 1630 to the Paston family. The helmet that hung above this monument is now in the NCM. Whilst moving headstones in the churchyard a late Saxon knife was found. Excavations to put in a pipe recovered a piece of Roman pottery.

Images - none

Location

Grid Reference: TG 3351 0917
Map Sheet: TG30NW
Parish: BLOFIELD, BROADLAND, NORFOLK

Full description

Norman? 14th-15th centuries.
See (S1).
E. Rose (NAU), 1979.

Late Saxon knife from yard, see (S2).
Helmet from Paston monument on loan to NCM.
E. Rose (NAU).

Pipe trench, 500mm deep and 300mm wide dug from churchyard wall south towards tower.
At TG 3352 0922 a basal sherd of Roman greyware, not especially abraded in spoil heap, otherwise nothing of archaeological significance noted in what was all grave disturbed ground.
A. Robson (NA), 13 July 2000.

July 2004.
Faculty granted for stained glass to be moved from the east window of the north aisle to its centre.

Monument Types

- CHURCH (Medieval - 1066 AD to 1539 AD)
- CHURCH (Post Medieval - 1540 AD to 1900 AD)

Associated Finds

- POT (Roman - 43 AD to 409 AD)
- KNIFE (Late Saxon - 851 AD to 1065 AD)
- FONT (Medieval - 1066 AD to 1539 AD)
- PISCINA (Medieval - 1066 AD to 1539 AD)
- TILE (Medieval - 1066 AD to 1539 AD)
- WALL PAINTING (Medieval - 1066 AD to 1539 AD)
- WINDOW (Medieval - 1066 AD to 1539 AD)
Protected Status

- Listed Building

Sources and further reading


<S2> X-ray: Xray.
<S3> Leaflet: 2000. The Parish Church of St. Andrew and St Peter, Blofield, Norfolk: Historical Guide.

Related records - none

Find out more...

- Parish Summary: Blofield (Parish Summary)

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APPENDIX 2

Photographs

2 March 2020
Photo 1. North elevation of Church of St Andrew and St Peter as seen from Church Road
Photo 2. West elevation of Church of St Andrew and St Peter as seen from the churchyard
Photo 3. View from Church Road, looking southeast

Photo 4. View west along Church Road
Photo 5. View to church tower from junction of Church Road and Stocks Lane

Photo 6. View southwest from Blofield FP12 at southern churchyard boundary
Photo 7. View to the church tower from the Run Dike
APPENDIX 3

Historic Ordnance Survey Plans
Landmark Historical Map
County: NORFOLK
Published Date(s): 1887
Originally plotted at: 1:10,560
Landmark Historical Map
County:
Published Date(s): 1975
Originally plotted at: 1:10,000
This product is printed on stock and in a process that conforms to the PEFC standards for sustainably managed forests.