TOWN AND COUNTRY PLANNING ACT 1990

SECTION 78

LOCAL INQUIRY

PROOF OF EVIDENCE

OF

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BROADLAND AND SOUTH NORFOLK COUNCILS

APPEAL BY:
Quantum Land (Brundall) Ltd against the refusal of Broadland District Council to grant outline planning permission 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.

PLANNING INSPECTORATE REFERENCE: APP/K2610/W/19/3239986
LOCAL PLANNING AUTHORITY REFERENCE: 20171386

AUGUST 2020

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1. Qualifications and Experience

1.1 My name is Chris Bennett. I am the Senior Heritage and Design Officer for Broadland and South Norfolk Councils.

1.2 I am a chartered member of the Royal Town Planning Institute and a Full Member of the Institute of Historic Building Conservation. I have a degree and a diploma in Town and Country Planning, a Masters in Building Conservation, and a Post Graduate Certificate in Urban Design.

1.3 I am a heritage and design specialist with over twenty years experience, working for the local authorities of Lichfield, Norwich, South Norfolk and Broadland Councils. For the past five years I have worked as the Senior Heritage and Design Officer for South Norfolk Council. For the last year I have also acted as the design adviser for Broadland Council, formally taking the role of Senior Heritage and Design Officer for both councils from January 2020.

1.4 I was not involved with original consideration of the planning application, being the Senior Heritage and Design Officer for only South Norfolk Council at that time. I have therefore only considered this case in the context of this Appeal.

2. Scope of Evidence

2.1 The planning application was determined by planning committee on 10th July 2019 and the decision notice was issued shortly thereafter on the 19th July 2019.
2.2 This proof has been provided in connection with the third reason for refusal, which was that the development would have a less than substantial harmful impact on the setting of Blofield Church (a Grade I Listed Building).

2.3 My evidence will focus on the significance of St Andrew and St Peters Church, the setting of the church, and the impact of the development on that setting. It should be read in conjunction with the proof of evidence submitted by my colleague Charles Judson and Robin Taylor of South Norfolk District Council who will be giving evidence on landscape issues.

2.4 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 I confirm that the opinions expressed are my true and professional opinions.

3. Legislative & Policy Context

3.1 Planning (Listed Buildings and Conservation Areas) Act 1990

Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 establishes the legislative context for development affecting listed buildings:

‘In considering whether to grant planning permission for development which affects a listed building or its setting, the Local Planning Authority or, as the case may be, the Secretary of State, shall 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.’
3.2 **National Planning Policy Framework**

3.2.1 Section 16 of the NPPF, sets out the Government’s policies on conserving and enhancing the historic environment. With regard to preserving significance, the relevant paragraphs of the NPPF are Paragraphs 190, 193 and 195.

3.3 **Adopted Joint Core Strategy for Broadland, Norwich and South Norfolk (JCS)**

3.3.1 Policy 1 of the JCS states:

> “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, the protection of their settings, the encouragement of high-quality maintenance and repair and the enhancement of public spaces.”

4.0 **Historic England Guidance on assessing setting**

4.1 Paragraph 19 of the Historic England Guidance on ‘The Setting of Heritage Assets’ (2017) (Core Document 8.31) sets out a series of steps which have been followed in assessing the implications of the proposed development:

- Step 1: identifying the heritage assets affected and their settings
- Step 2: assessing whether, how and to what degree these settings make a contribution to the significance of the heritage asset(s)
- Step 3: assessing the effect of the proposed development on the significance of the asset(s)
- Step 4: maximising enhancement and minimising harm
- Step 5: making and documenting the decision and monitoring outcomes
4.2 The church of St Andrew and St Peter Blofield is the only designated heritage asset which has a setting affected by the development proposal.

5. **Assessment of significance and special interest of St Andrew and St Peter, Blofield**

5.1 The significance of a heritage asset is defined in Annex 2: Glossary of the NPPF 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.’

5.2 The Church of St Andrew and St Peter is a Grade I listed building. The list description provides some detail on the elements of significance as to why the building is listed, but should not be treated as exhaustive.

5.3 Pevsner and Wilson (1997) (Core Documents 8.33) describe the church as

> “The largest church in the immediate neighbourhood. It has a big, tall W tower which looks later C14,.....But there is a string of bequests for its construction between 1427 and 1438.” Cautley (1949) (Core Document 8.35) states that it has a “Fine typical Norfolk tower.”.

5.4 The Norfolk Churches website (Core Document 8.36) describes the church as

> “Riding the crest of the hill like a great ship. St Andrew is the largest of the churches in the marshes between Norwich and Yarmouth” and states that the great tower is one of the tallest in Norfolk.
5.5 Historically Blofield was the administrative centre of the Blofield Hundred administrative area, which extended 13 miles on the north side of the River Yare from the edge of Norwich to Hardley Cross. Later the even larger Blofield Rural District Council covered an area to the edge of Great Yarmouth. Belying its current size, the settlement historically had significantly more administrative importance than is currently attached to it, and this may have been a factor in why the church tower is the largest in the area, dominating the surrounding countryside including views from neighbouring settlements such as Brundall.

5.5 The perpendicular tower dating from C14/C15 is a significant architectural feature of the church and is important with regard to its historical significance. It is the highest church tower visible within the surrounding rural area, highlighting its importance and significance as an architectural and historic building to not only the settlement of Blofield as its parish church, but also the surrounding rural area which includes the village edge of neighbouring Brundall.

5.6 In historic terms the tower is symbolic of the period in architecture when the perpendicular towers were purposely built taller, and Norfolk is particularly renowned for the height and size of its flint church towers during this period. The building of the church towers reflected a period of more intense piety and is historically symbolic of the social dynamics of this part of the country at the time. They are a reflection of the wealth of medieval patrons in the county during
this period and the great financial cost to communities, who would have funded their erection.

6. **Assessment of the setting St Andrew and St Peter’s Church, Blofield**

6.1 The setting of a heritage asset is defined in Annex 2: Glossary of the NPPF 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.’

6.2 Many aspects of the architectural and historic significance attached to the church, as described in the list description, are best appreciated and experienced from viewing the church in close proximity within the immediate setting of its churchyard, and also from visiting the inside of the church. The development will have no impact on these aspects of experiencing the church and its significance.

6.3 However, the church tower has architectural and historic importance and significance in terms of its height and visual dominance as an architectural form, and one that has dominated the surrounding area for over five centuries as the principal landmark and focal point in the area. This can only truly be experienced and appreciated through viewing it from a distance within its surrounding rural context. Views within the wider setting of the church, which include views from the appeal site including the footpaths that currently run along the south and west sides of the field. These views therefore make an
important contribution to appreciating the architectural significance of the church and its historical importance as a key historic landmark building within the wider community.

6.0 **Assessment of impact of the development on the setting**

6.1 The development will result in the development of an agricultural field across which the church tower can currently be viewed from the public footpaths which run along its south and west sides. These paths currently provide views of the church tower of within the rural settlement of Brundall that is still clearly distinct separate from the settlement of Brundall. The church tower is still therefore experienced within a wider rural agricultural setting and clearly as a focal point of the Blofield settlement/parish.

6.2 Due to development of a significant part of the appeal site, some of these views will no longer exist and from other views the church will be viewed within a more urbanised environment. Having the appearance of the modern housing estate dwellings, however well designed, within the remaining views and those created through public access will not be the same as viewing the church within a rural landscape of fields and hedgerows that characterise the views at present, and which can be considered important to its wider setting as a rural parish church – the largest church tower acting as a visual marker for the most important historic settlement within the surrounding rural area, and one which has maintained its rural character being surrounded by agricultural fields.
6.3 New publicly accessible viewpoints of the church will be created from the public space to be provided at the west end of the appeal site and also along the edge to the north. These will provide additional views which will be of some benefit. The benefit from creating new views are however considered to reduce rather than remove the level of harm. In views from and around the appeal site the church tower will be viewed within a more urbanised setting where there will be less of a distinct rural separation between the settlements of Blofield and Brundall. Views from the general location towards Blofield Church within its current wider rural setting will not be as extensive as they were and the views will contain significantly more urban development. However, because this is not the only view of the church within its rural setting, the impact will be at the lower end of the ‘less than substantial’ spectrum of harm.

Conclusion

7.1 For the reasons set out above, I am of the opinion that proposed development will not preserve the setting of the grade I listed St Andrew and St Peters Church, Blofield and that it will result in less than substantial harm to the setting and the significance of heritage asset. This should be given special regard in determining the appeal in accordance with paragraph 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and given great weight in accordance with paragraph 193 of the NPPF.