



CATSS

CAMPAIGNERS AGAINST TWO SILICA SITES | SHOULDHAM AND MARHAM

CATSS - We Object to Quarrying in AOS E and the overlap of SIL 02 the Preferred Area On Historical Grounds

The Historic Environment Impact Assessment of AOS E and SIL 02 April 2019 with focus on Pentney Priory Gatehouse, suggested that a large area of SIL02 should be withdrawn from the plan as it was incompatible with the historic setting and context of this scheduled monument. What is not covered in this impact statement is the buried remains of part of this Augustinian Priory; there is nothing visible above ground but is revealed by crop marks, covering approximately 13.5 hectare area to the South towards the river Nar, and to the East and West. Surely this area should be designated as an area of historical importance? The finds could well stretch the length of the area of the former SIL02, now subsumed as part of AOS E, as the river Nar was diverted in the monastic period. Settlements and artefacts undiscovered would be lost forever if any quarrying was to take place. Given the significance and proximity to the six sites, three either side of the Nar, surely a very detailed historic analysis and archaeological study should be paramount and Norfolk County Council should exclude this area and remove it from their plan.

NCC Historic Environment Impact Assessment dated April 2019 of SIL02 cites from NPPF(2019), *'The surroundings in which..... may change... evolve'*. Does this suggest that the assessment isn't truly focussed on looking after our rich history but that 'progress' is quarrying under the banner of change and evolve? What is the point of NCC placing any restrictive criteria on any area of search in that case, or for that matter why not reveal all the deposits of silica sand in Norfolk as recorded by the British Geological Survey and say the whole of West Norfolk is open to be quarried? (It is interesting that NCC makes use of the NPPF in their favour when it suits their aim, in this case the citation above in favour of 'development' around heritage assets but ignores other important parts of NPPF that conserve minerals and primary materials - Sect 17, para 204.b.)

Additionally, the same assessment proposes a 2Km exclusion Zone to the East of Pentney Priory Gatehouse as sufficient not to impinge on that landscape; the assessment cites NPPF para 194 that any bunding would impose an unacceptable constraint on that view. However, only 1Km is proposed to the South of this historic building; with a similar flat landscape over the Fen towards Spring Lane this seems

at odds with protecting the view towards or away from the Gatehouse. We appeal to NCC to look at this oversight again and propose the same restrictions to the South of Pentney Priory Gatehouse as there is to the East. This area SIL 02 was also objected to by MOD (DIO), so why has NCC seen fit to include it?

The centre of AOSE, Shoudham Warren, is a medieval landscape and an area of high archaeological possibility. The area rises above the landscape and is highly likely to be a medieval farmed network. The remnants of an ancient spring on the hill of the Warren with a Rhododendron avenue being an important area for archaeological study. Within the Warren itself, areas used in WW2 are preserved and a rifle butt within close proximity of the entrance; the historic links to our past evident and in need of protection.

Just to the south of Shouldham Warren and on the northeast extremity of Shouldham village, lie the earthworks of Shouldham Priory (see chart on pg 28 of the Historic Environment Impact Assessment referred above). There are also buried remains of part of a gravel road that runs along the south side of Abbey farm. This road is potentially Roman; approx 5m wide. The road east of the adjacent field can be seen from the air. Roman pottery has been found in this area and archaeological remains are possible within the vicinity. There is also thought to be bronze age artefacts and the area should be protected for its historical setting and for archaeological study.

A quarry in AOS E and/or the overlap of SIL 02 the Preferred Area would irreversibly change the local landscape and affect the historical character of the area and the many historical monuments and their setting. This is supported by NCC's own Historic Environment Impact Assessment of AOS E and SIL 02.