Endurance Estates Land Promotion Ltd
(EELP)
March 2026

BIDWELLS

Initial Heritage Assessment

Land East and South of Holt Road, Horsford



BIDWELLS

QUALITY ASSURANCE

SITE NAME:	Land East and South of Holt Road Horsford
CLIENT NAME:	Endurance Estates Land Promotion Ltd
TYPE OF REPORT:	Initial Heritage Assessment
PREPARED BY:	Rowan Easter MSc BSc (Hons)
DATE:	31st March 2026
REVIEWED BY:	Sarah Wearing MSt BA (Hons)
DATE:	31st March 2026

Figure 1 - Cover image is extract of Tithe Map

1.0 Executive Summary

1.1 This Initial Heritage Assessment has been prepared by Bidwells on behalf of Endurance Estates Land Promotion Ltd (EELP) to support the promotion of two sites within the emerging Horsford Neighbourhood Plan: c.25ha of land to the east of the village centre (referred to in this assessment as 'Site A') – forming a draft allocation for approximately 300 dwellings and a community hub buildings, and c.10ha of land south of Holt Road ('Site B') – forming a draft allocation for a sports hub for sport and recreation uses.

1.2 The assessment provides a high-level appraisal of the heritage assets that have the potential to be impacted by the proposals to identify any potential built heritage opportunities and constraints for the sites.

Heritage Assets

1.3 The following heritage assets have the potential to be impacted by the proposals:

LISTED BUILDINGS	
NAME	**GRADE**
Church of All Saints, Horsford	Grade II*;
Horsford Hall	Grade II
SCHEDULED MONUMENT	
Horsford Castle (earth mound)	
NON-DESIGNATED HERITAGE ASSETS	
Barn behind No 106 Holt Road	
Deer Park	

1.4 Heritage Assets that have been scoped out of assessment are identified within Section 4 below.

Conclusion

1.5 In our professional opinion, the proposals would provide a neutral to low adverse impact as a result of the proposed developments of Sites A and B. There will be significant public benefits associated with the scheme, including a new community centre and sports hub which are likely to offset the low levels of less than substantial harm identified.

LISTED BUILDINGS			
NAME	**GRADE**	**NATURE OF IMPACT**	**MAGNITUDE**
Church of All Saints, Horsford	Grade II*;	Adverse	Low adverse impact (less than substantial harm) through change to wider setting
Horsford Hall	Grade II	Neutral (Site A) and Adverse (Site B)	Neutral (Site A) and negligible to low adverse (Site B – secondary effects only)
SCHEDULED MONUMENT			
NAME		**NATURE OF IMPACT**	**MAGNITUDE**
Horsford Castle (earth mound)		Neutral	Nil
NON-DESIGNATED HERITAGE ASSETS			
NAME		**NATURE OF IMPACT**	**MAGNITUDE**
Barn behind No 106 Holt Road		Beneficial	Beneficial impact through retention and reuse
Deer Park		Adverse	Low adverse

BIDWELLS

CONTENTS

1.0 Executive Summary 3
2.0 Introduction 6
Background to the Report 6
Scope and Limitations of the Report 6
3.0 Site Context 9
Location 9
Site Description 9
Historic Context 11
4.0 Heritage Assets 14
Identification of Assets 14
5.0 Assessment of Significance 16
Significance Assessment Methodology 16
Significance Assessment 16
6.0 Proposals 21
7.0 Initial Impact Assessment 23
Initial Assessment 23
Maximising Enhancements and Avoiding Harm 26
8.0 Conclusions 29
9.0 APPENDICES 31
APPENDIX A_HISTORIC ENGLAND RESPONSE TO THE REGULATION 14 CONSULTATION 31
APPENDIX B_METHODOLOGY 33
APPENDIX C_HERITAGE LEGISLATION, POLICY AND GUIDANCE SUMMARY 37
APPENDIX D_LIST DESCRIPTIONS 40

INTRODUCTION

2

2.0 Introduction

Background to the Report

2.1 This Initial Heritage Assessment has been prepared by Bidwells to support the draft allocation of Land East and South of Holt Road, Horsford in the emerging Horsford Neighbourhood Plan and to confirm the sites suitability for their proposed uses from a built heritage perspective.

2.2 The site forms a draft allocation in the emerging Horsford Neighbourhood Plan (Regulation 14 Version October 2025), under Policy SS2A, for approximately 300 dwellings and a community hub building (hereafter referred to as "Site A") on land to the east of the village centre and a sports hub (hereafter referred to as "Site B") on land south of Holt Road for sport and recreation uses.

2.3 Neither site contains any Statutory Listed Buildings, nor are they located within a Conservation Area but they may be regarded to fall within the setting of a number of designated heritage assets.

2.4 As a result, this Initial Heritage Assessment includes a Significance Assessment which identifies the relative heritage value of the identified heritage assets and an Initial Impact Assessment which considers the potential impact of the proposed development on the significance of the heritage assets identified, including the contribution made by setting. This approach to impact-assessment is required in order to satisfy the provisions of Section 66(1) of the Planning (Listed Buildings & Conservation Areas) Act 1990 and the National Planning Policy Framework (NPPF) where the impact of development on a heritage asset is being considered (Paragraphs 207-221).

2.5 A site visit was undertaken in June 2025 and in March 2026.

2.6 Regulation 14 consultation on the Horsford Neighbourhood Plan took place from 16th October to 27th November 2025. Historic England provided comments on the Horsford Neighbourhood Plan (Reg 14) document (provided within Appendix A).

2.7 In relation to the Site, Historic England advised that a Heritage Impact Assessment (HIA) is carried out to inform the site selection and policy wording for potential site allocations under Policy SS2A. The assessment should consider if there are any key views from/to the assets, and if any landscaping/screening or open space is needed to protect the assets. Opportunities for enhancement should also be explored (e.g. better interpretation etc).

2.8 This Assessment responds to the comments of Historic England.

Methodology

2.9 Our methodology is set out in Appendix B.

Heritage legislation, policy and guidance

2.10 The legislation, policy and guidance summary is set out in Appendix C

Scope and Limitations of the Report

2.11 The level of detail provided within this assessments is proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance" as set out in Paragraph 207 of the National Planning Policy Framework.

2.12 This document is not a condition survey or a full conservation management plan and should not be used as such.

2.13 Photographs contained in this report (where no source is given) are those of the author. All maps (unless otherwise stated) are reproduced with the permission of the National Library of Scotland. Sources are provided for all other photographs and images, the copyright of which may remain with the original author. This report should therefore not be used for any purpose that may infringe the original copyright.

2.14 For full details of the site and the proposed development, reference should be made to the plans and documents produced by LDA Design.

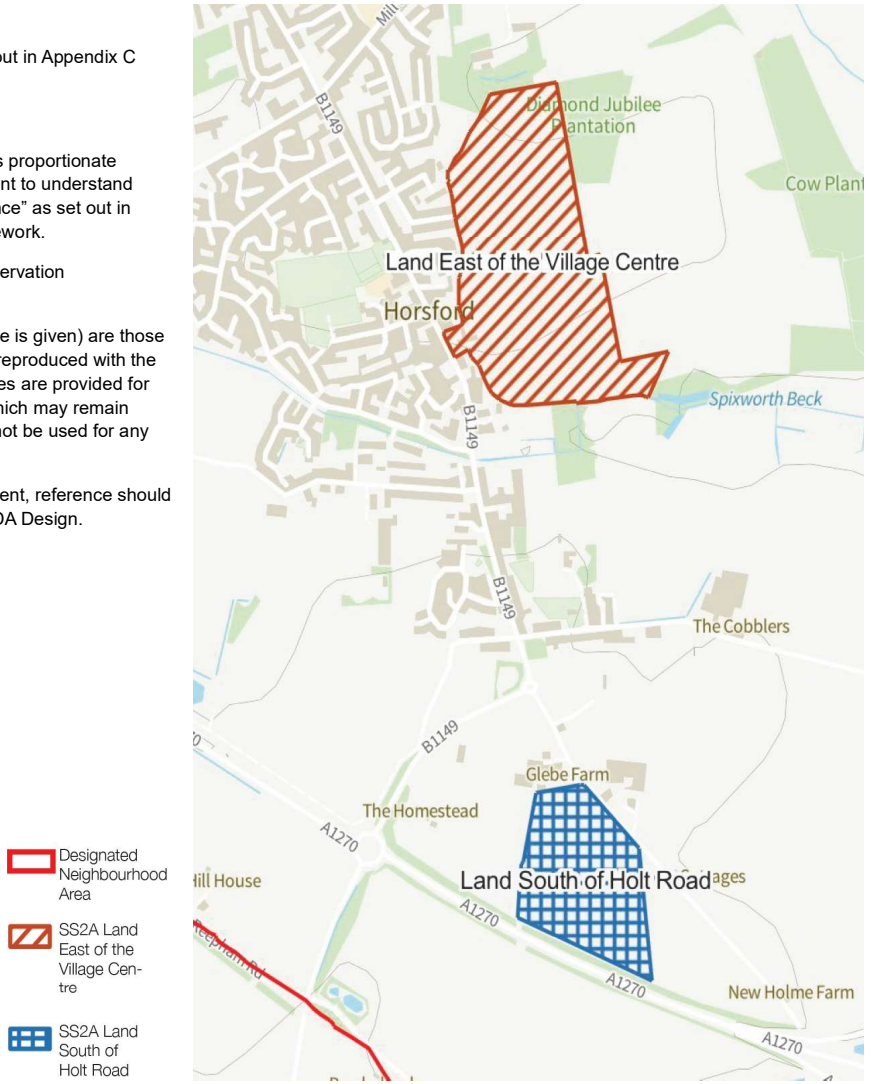


Figure 2 - "New Development Map" Note boundaries shown are indicative and may not be accurate (HORSFORD NEIGHBOURHOOD PLAN 2025 - 2038 REGULATION 14 VERSION, OCTOBER 2025)

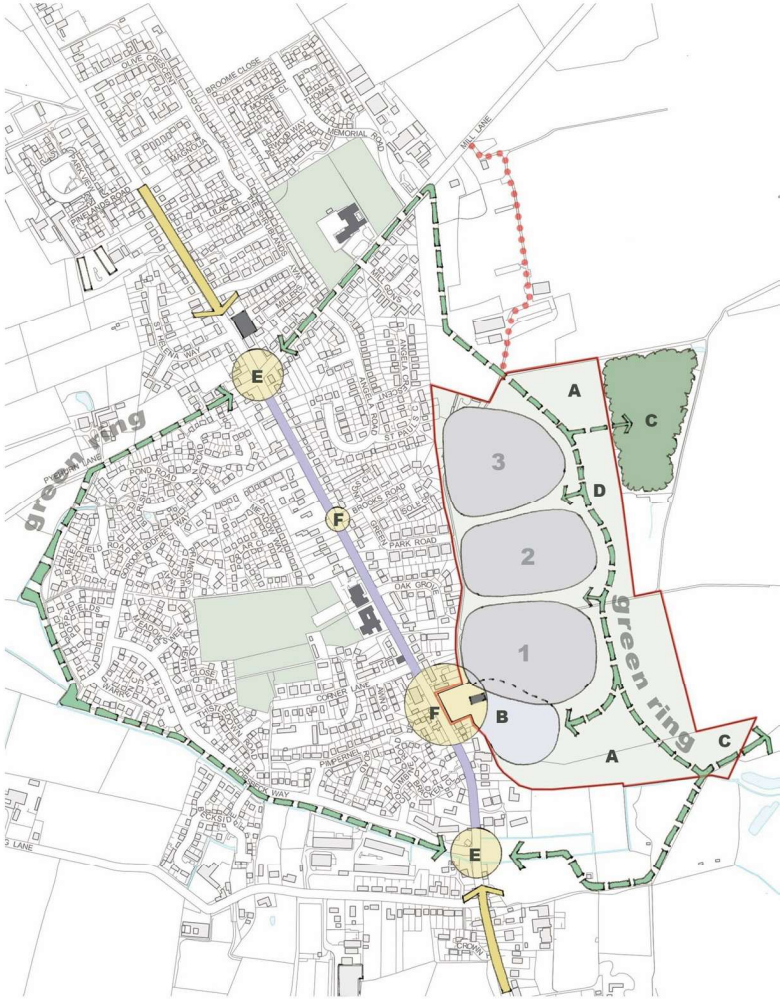


Figure 3 - Development Principles (HORSFORD NEIGHBOURHOOD PLAN 2025 - 2038 REGULATION 14 VERSION, OCTOBER 2025)

SITE CONTEXT

3

3.0 Site Context

Location

3.1 Site A is located on the eastern edge of Horsford, a village situated approximately 5 miles north-west of Norwich in Norfolk. The site is not located within a Conservation Area; however, it lies in close proximity to the built extent of Horsford and forms part of its rural-urban fringe.

3.2 Site B is positioned beyond the main built extent of the village and is accessed via Holt Road. The site is not located within a Conservation Area and is situated within open countryside.

Site Description

Site A

3.3 Site A comprises a series of agricultural fields positioned immediately to the north and east of established residential areas within Horsford. The land is predominantly in arable use and is defined by large, open field parcels with relatively regular boundaries. These are delineated by a combination of hedgerows, tree belts and areas of woodland, particularly along the eastern and southern edges.

3.4 The surrounding area is characterised by a transition from suburban residential development to open countryside. To the west and south, the site is bounded by post-war and late 20th century housing, arranged in a typical suburban layout of cul-de-sacs and estate roads. These residential areas are generally of low density and comprise detached and semi-detached dwellings, predominantly constructed in brick with tiled roofs, reflecting common regional vernacular forms.

3.5 To the north and east, the character becomes more distinctly rural, with expansive tracts of arable farmland interspersed with woodland blocks and shelterbelts. Field patterns are relatively large-scale and open, contributing to a sense of spaciousness and agricultural character. The presence of mature tree belts and woodland edges provides visual containment in parts, although longer views across the landscape are possible, particularly towards the north-east.

3.6 Site A forms part of this transitional landscape, with its western boundary closely defined by the rear curtilages of residential properties, while its remaining boundaries interface with open farmland.

Site B

3.7 Site B comprises a single agricultural field set within a wider expanse of open countryside. It is located to the south of the main settlement edge of Horsford and is physically separated from the village by intervening farmland and infrastructure, including a major road corridor to the west.

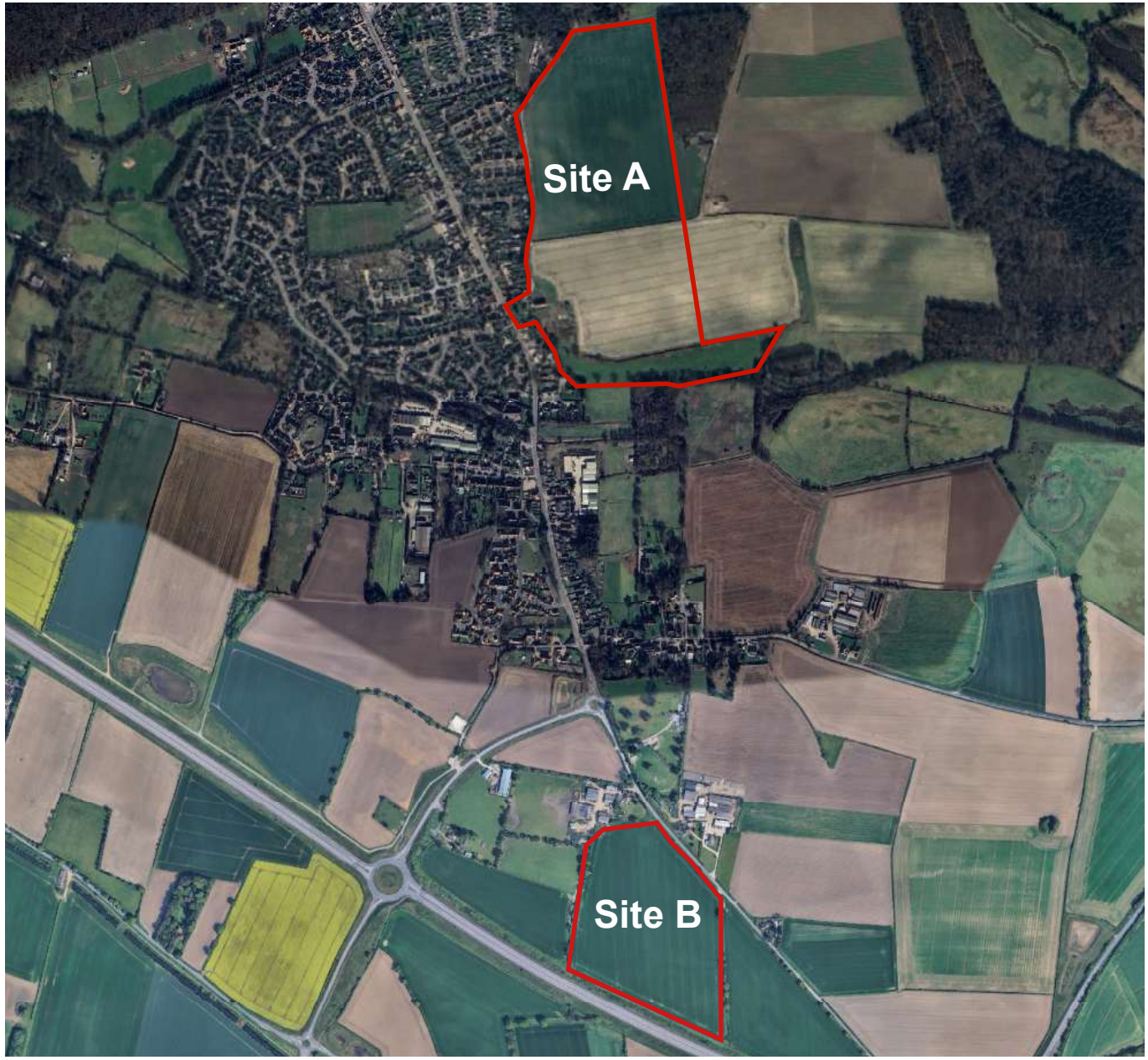


Figure 4 - Approximate Site Location

3.8 The surrounding area is characterised by large-scale, open arable farmland typical of the Norfolk landscape. Fields are generally expansive and regular in form, defined by hedgerows, drainage ditches, and occasional tree lines. The landscape is relatively flat, allowing for long-distance views across the surrounding countryside. Woodland is limited, although there are small clusters of trees and shelterbelts associated with farmsteads and field boundaries.

3.9 Development in the vicinity is sparse and dispersed. To the north, there are small clusters of agricultural buildings and farmsteads, often set within their own plots and accessed via narrow rural lanes. These buildings are generally utilitarian in character, comprising a mix of traditional farm buildings and more modern agricultural structures. Occasional isolated dwellings are also present, typically associated with agricultural use.

3.10 The site itself is enclosed by field boundaries and is bordered to the south and west by a road corridor, which introduces a degree of movement and infrastructure into the otherwise rural setting. Despite this, the overall character of the site remains strongly agricultural and undeveloped.

3.11 The access to the site is via a minor road which terminates locally and does not serve as a through route. As such, the area experiences limited traffic and retains a quiet, rural character, distinct from the more suburban edge conditions seen to the north of Horsford.

3.12 The following images have been included to provide a record of the site as found in June 2025.



Figure 5 - Site entrance to Site A



Figure 6 - General view across Site A



Figure 7 - Barn and outbuildings on Site A



Figure 8 - View across Site B

Historic Context

3.13 The following section provides an overview of the historic development of the site and the immediate surrounding area.

3.14 Historic England Guidance requires assessment of the degree to which an asset's setting makes a contribution to the significance of the asset. Setting is subjective but it incorporates the asset's visual surroundings, its relationship with any other assets, the ways in which the asset is appreciated, together with any historical association or patterns of use.

Map Regression

3.15 An initial review of available historic maps has been undertaken to assist in the understanding of the site's history. Although such cartographic information cannot be considered to be definitive, experience shows that the mapping is often relatively accurate and reliable - particularly the later Ordnance Survey (OS) maps - and taken together with written archival data and physical evidence, can help to refine the history of a site.

3.16 The Tithe map of 1841 shows the Site A as predominantly farmland but with a large gravel pit in the northwest quadrant (site 384). The boundaries of the gravel pit are still evident as markings on aerial photography today.

3.17 At the date of the Tithe records, the entire northern site was in the ownership of Sir Thomas Barrett Lennard, Baronet and leased to John Baker. This included the farmhouse (106 Holt Road) and barn off Holt Road, demonstrating a long-standing connection between the various parcels of land which now form the northern site.

3.18 Site B was known as Plantation Piece. It was also owned by Sir Thomas Barrett Lennard, Baronet and occupied by George Gardiner. To the east of Site B is a pair of cottages. These red brick cottages with distinctive arched windows are still extant today.

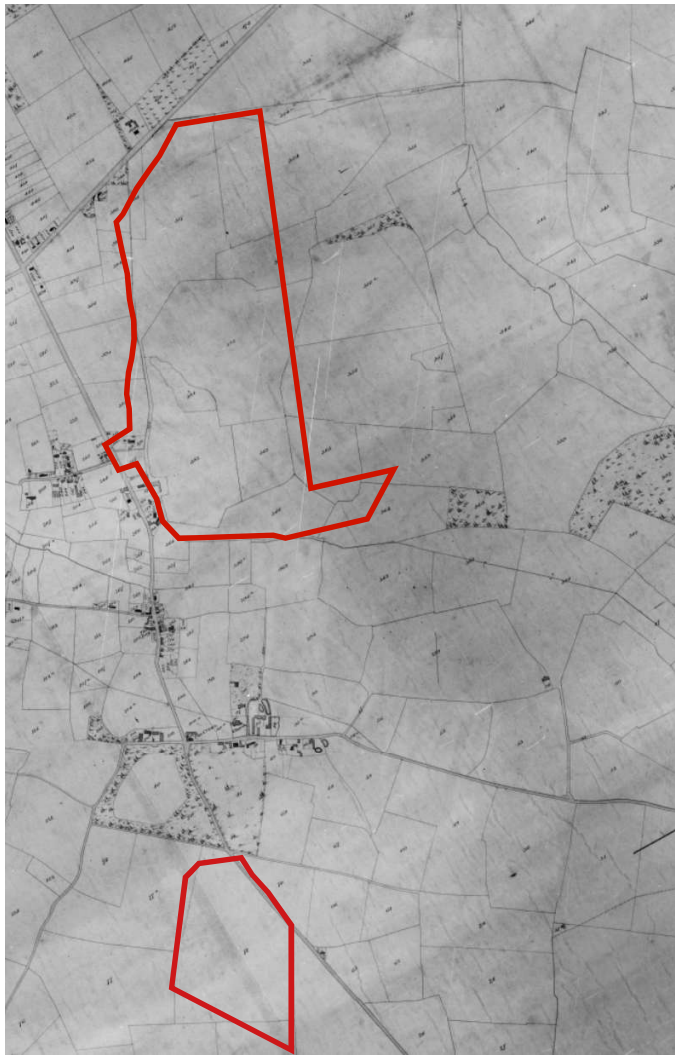


Figure 9 - Tithe Map, circa 1840 with approx site boundaries indicated.



Figure 10 - Detail of Site A showing 106 Holt Road with associated barns. Site 384 is recorded as a gravel pit.

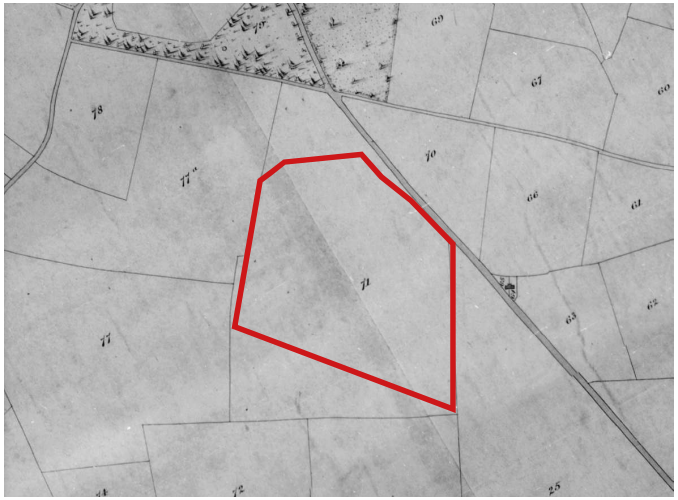


Figure 11 - Detail of Site B. Red brick cottages to the east of the site are already constructed.

3.19 The First Edition OS map, dated 1888, shows little change, although 106 Holt Road has been reconfigured or rebuilt. It is accessed via the lane which also serves as the field and barn access, although the configuration of the buildings means the relationship between them isn't immediately evident.

3.20 Later OS maps show there is limited infill development in the village until the mid-20th century, although residential streets such as Brooke Road were developed. An 1988 aerial photograph shows that a large amount of housing development has been introduced by this date, with the village now centred around the Mill Lane/Holt Road junction and most of Holt Road having an active frontage of buildings.

3.21 Site B experiences little change over the 20th century, with the exception of the development of two new farms to the site's immediate north, Glebe Farm and Dairy Farm. The A1270 Broadland Northway was constructed in phases during the 2010s, with the full route opening in 2020. This severed the former route from Horsford to Norwich and Holt Road travelling south became a dead end.



Figure 12 - Detail of Site A on First OS Map showing 106 Holt Road has been reconfigured or rebuilt

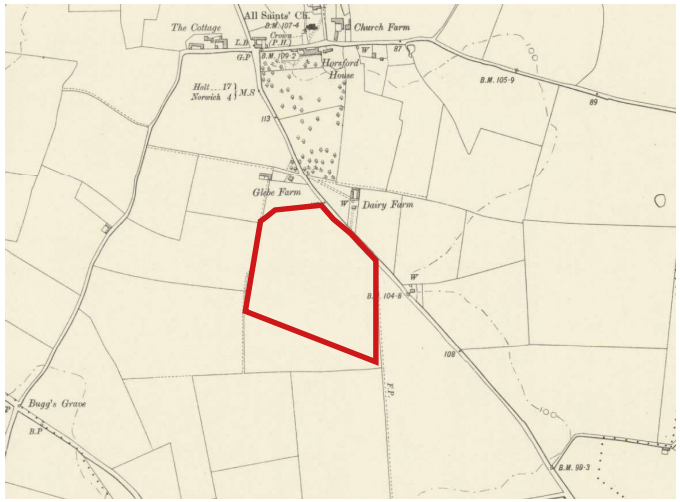


Figure 14 - Detail 1908 OS Map showing Glebe Farm and Dairy Farm have been constructed close to Site B.

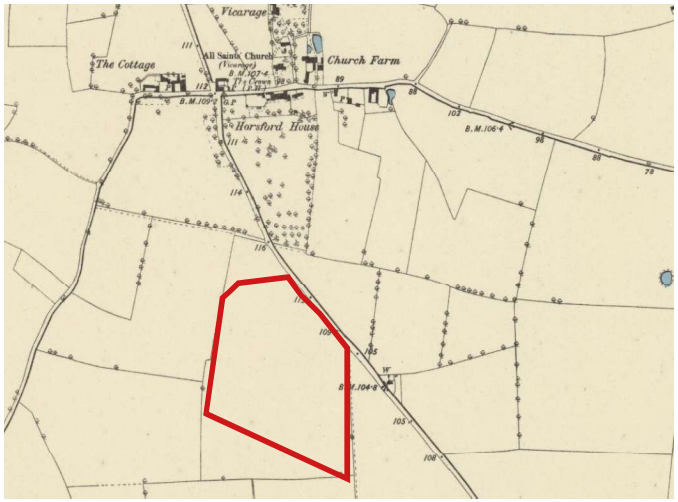


Figure 13 - Detail of Site B on First OS Map showing urrounding agricultural landscape.

HERITAGE ASSETS

4

4.0 Heritage Assets

Identification of Assets

4.1 This section identifies any heritage assets which have the potential to be affected by the proposals, either directly through a material change, or indirectly through a change to the contribution of their settings. The identification of these assets is based on the character of the surrounding area, the nature of the proposed scheme and professional judgement, which is consistent with paragraph 207 of the NPPF in providing a level of detail proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. Below ground heritage assets have not been considered as they are beyond the scope of this assessment.

4.2 The following heritage assets have been identified as having the potential to be impacted by the proposals.

List of Assets

1) Church of All Saints, Horsford – Grade II*;
2) Horsford Hall - Grade II
3) Horsford Castle (earth mound) – Scheduled Monument;
4) Barn behind No 106 Holt Road – Non designated heritage asset;
5) Deer Park – Non designated heritage asset.

4.3 In accordance with 'Step 1' of the GPA3 The Setting of Heritage Assets, some assets have been scoped out of further assessment as they will not be directly or indirectly be impacted by the proposed scheme as a result of topography, intervening distance, built form, vegetation, the sensitivity of the heritage assets, the lack of historic links between the site and the heritage asset and the nature and scale of the proposed changes.

4.4 The following assets have been visited and scoped out of further assessment:

6) Horsford War Memorial - Grade II
7) Littel Orchard - Grade II
8) The Lindens - Grade II

4.5 All relevant Statutory List descriptions can be found in **Appendix D**. Any buildings or structures considered to fall within the curtilage of the above listed buildings would be considered to form part of the listed building and impacts would be assessed accordingly.

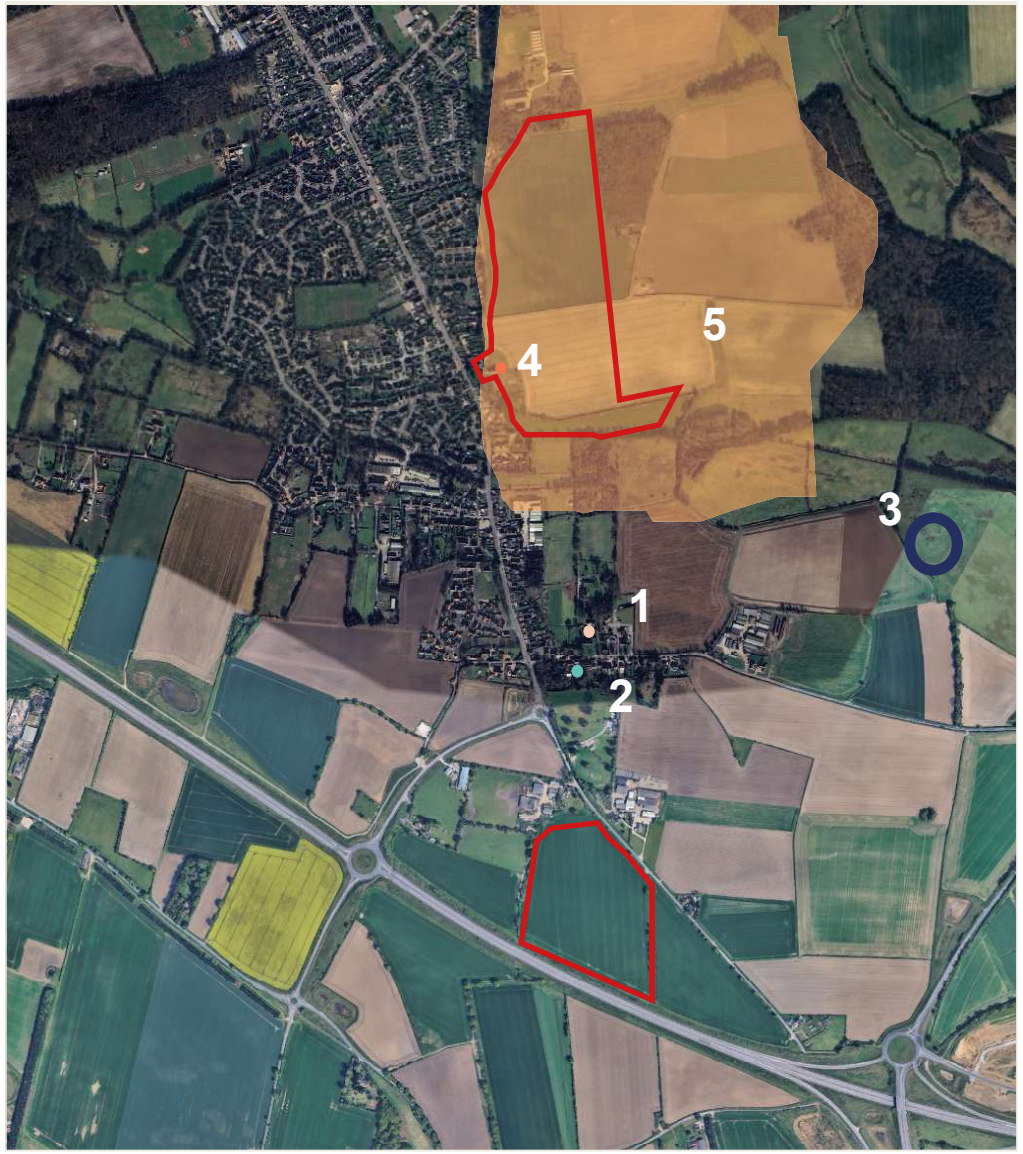


Figure 15 - Heritage Assets Map

ASSESSMENT OF SIGNIFICANCE

5

5.0 Assessment of Significance

Significance Assessment Methodology

5.1 The below evaluation of significance and subsequent conclusions have been assessed in line with the methodology outlined in **Appendix A**, the NPPF and guidance set out in Historic England advice notes.

5.2 The core of an assessment includes an understanding of the value/ significance of a place. There have been numerous attempts to categorise the range of heritage values which contribute to an asset's significance. Historic England's Advice Note 12 '*Statements of Heritage Significance*' sets out a grouping of values as follows:

- ***'Archaeological Interest -*** *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*'.
- ***'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 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 skills, like sculpture*.'
- ***'Historical 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*'.

Significance Assessment

Parish Church of All Saints (Grade II*)

5.3 The Parish Church of All Saints is located on the north side of Church Road in Horsford. It was included on the Statutory List of Buildings of Special Architectural or Historic Interest in 1961 and is designated at Grade II*.

5.4 The church is of medieval origin with later phases of alteration and extension. It is constructed primarily of flint, with areas of flint and brick render, and incorporates stone dressings. The roofs are covered with pantiles and thatch. The plan form comprises a west tower, nave, chancel, north aisle and south porch.

5.5 The west tower, dated to 1456, is of three stages with diagonal buttresses and a stair turret at the north-east corner. It features a Perpendicular-style two-light window to the west, squared traceried sound holes, and two-light bell openings with reticulated tracery. The tower is finished with a battlemented parapet with flushwork detailing. The nave is of four bays and incorporates Perpendicular-style windows with flowing tracery and quatrefoil motifs, some of which have been restored. The north aisle, added in 1869, is gabled and of three bays, with rectangular-headed windows and reticulated tracery. The south porch is a 19th-century addition in the Perpendicular style.

5.6 The chancel is single-bayed and predominantly rendered, with the date "1705" inscribed in the flintwork of the east gable. Fenestration includes lancet windows and a priest's door. Internally, the church retains a mixture of medieval and later features, including a 12th-century Purbeck Marble font, a 13th-century piscina, a 15th-century chancel screen (heavily restored), and fragments of medieval stained glass. Much of the internal fabric reflects 19th-century restoration, including the roof structure and arcades.

5.7 Positive characteristics include the survival of medieval fabric, the quality of the tower, and the historic plan form. Later additions, including the 19th-century aisle and porch, contribute to the building's evolution but are of comparatively lesser significance. The 20th-century boiler house represents a negative or neutral element of limited heritage interest.

Archaeological Interest

5.8 The church occupies a site with clear medieval origins and is likely to overlay earlier phases of activity associated with ecclesiastical use. Given the continuity of use and the presence of historic burials within the churchyard, there is potential for below-ground archaeological remains relating to earlier structures and phases of development. However, the site has been subject to successive phases of construction and alteration which may have disturbed earlier deposits.

5.9 The archaeological interest of the asset is considered to be **medium**.

Architectural and artistic interest

5.10 The church is a good example of a medieval parish church with later additions and restorations. The tower is of particular architectural quality, displaying characteristic Perpendicular detailing and skilled flintwork. The combination of flint, stone dressings and traditional roofing materials contributes to a cohesive and regionally distinctive appearance.

5.11 Internally, the survival of features such as the font, piscina and chancel screen provides a strong sense of historic character, despite the extent of 19th-century restoration. Later interventions are generally sympathetic but do not match the significance of the medieval fabric.

5.12 The architectural and artistic interest of the building is considered to be **high**.

Historical interest

5.13 The church has strong illustrative historical interest as a surviving medieval parish church, reflecting the development of Horsford and its role within the ecclesiastical landscape of Norfolk. The phased development of the building, including later medieval and post-medieval alterations, illustrates changing liturgical practices and local investment over time.

5.14 Associative historical interest is more limited. While the church is linked to the wider historical development of the village, there are no clear associations with individuals or events of national significance.

5.15 The historical interest of the building is considered to be **high**.

Setting

5.16 The immediate setting of the church comprises its churchyard, which has been extended to the west, and the buildings along Church Road. The churchyard is elevated above the road by approximately 1.5m and is enclosed by a red brick retaining wall, providing a degree of visual separation from the street.

5.17 Church Road is narrow, with buildings set close to the road edge, creating a sense of enclosure. Opposite the church is Horsford Hall, a red brick building with a symmetrical plan and rendered pavilion extensions, alongside Flint Cottage and later 20th-century buildings. These contribute to a mixed but generally historic character.

5.18 To the north, the setting becomes more open, with views across agricultural land towards Spixworth Beck and gently rising terrain beyond. These views are partially filtered by trees and modern agricultural structures but retain a broadly pastoral character.



Figure 16 - Church of All Saints

5.19 The setting of the church is considered to make a **moderate beneficial** contribution to its significance.

Contribution of site to setting

5.20 Site A is located approximately 500m to the north of the church and forms part of its wider setting. Intervening vegetation limits inter-visibility, although the tower and roofline can be glimpsed from parts of the site. From the churchyard, the site reads as part of the green horizon beyond the village.

5.21 Site A contributes in a limited way to the rural backdrop of the church but does not form a key component of its immediate setting.

5.22 Site A is considered to make a **low beneficial** contribution to the setting of the church.

5.23 Site B is located approximately 430m south of the church and does not form part of its setting. This is due to intervening trees and buildings, as well as Site B's agricultural rather than village context.

Summary

5.24 Overall, the Parish Church of All Saints is considered to hold a **high** level of significance in heritage terms.

Horsford Hall (Grade II)

5.25 Horsford Hall is a Grade II listed former manor house located on the south side of Church Street in Horsford. It was included on the Statutory List of Buildings of Special Architectural or Historic Interest in 1952.

5.26 The building is predominantly 18th century in date, with evidence of an earlier core, possibly of 17th-century origin. It is constructed of red brick, colourwashed and rendered brick, beneath a pantiled roof. The plan form is symmetrical, comprising a principal range with a double-pile, two-storey wing linked to a single-storey hipped pavilion.

5.27 The principal (north) elevation faces Church Street and is arranged across five bays, with a centrally positioned entrance. The façade reflects alterations undertaken in the early 19th century, when the building was stuccoed and the original six-bay arrangement modified. The later removal of stucco in the late 20th century revealed earlier fabric, including gauged brick arches and possible 17th-century brickwork, enhancing the legibility of the building's development.

5.28 The current windows are timber sash windows with glazing bars, set within timber architraves and rendered lintels formed as skewback arches. The central entrance comprises a six-panel door with a semi-circular fanlight featuring radial glazing bars, framed by a timber doorcase with panelled reveals, a fluted frieze and cornice. The elevation is finished with a plain eaves cornice and a parapet.

5.29 The rear elevation is similarly arranged across five bays and includes a central doorway with an open pedimented doorcase supported on consoles, and a semi-circular fanlight with reticulated tracery. The building retains further architectural detailing, including a timber modillion cornice, brick parapets, and double parapet gables with end stacks.

5.30 Internally, the building retains features of note, including a panelled drawing room. The linked pavilions and arched recesses contribute to the architectural composition, although later lean-to additions to the east are identified as being of no special interest.

5.31 The principal elevations, surviving historic fabric, and architectural detailing form the key elements of significance. Later alterations, including some insertions and ancillary additions, are of lesser or neutral significance.

Archaeological Interest

5.32 The building incorporates evidence of an earlier core, likely dating to the 17th century or earlier, suggesting the potential for below-ground remains associated with earlier phases of occupation. As a former manor house, the site may retain archaeological evidence relating to earlier domestic arrangements, ancillary structures, or land use. However, the site has been subject to successive phases of alteration and development, which may have disturbed earlier deposits.

5.33 The archaeological interest of the asset is considered to be **low** to **medium**.

Architectural and artistic interest

5.34 Horsford Hall is a well-composed example of a country house of predominantly 18th-century date, with later modifications that illustrate its architectural evolution. The symmetrical façade, use of brick with gauged arches, and refined detailing such as the entrance doorcase, sash windows, and cornicing contribute to its architectural quality.

5.35 The removal of later stucco has enhanced the building's evidential and aesthetic value by revealing earlier fabric and construction techniques. The combination of Georgian proportions with earlier structural elements adds to its architectural interest.

5.36 Internally, the survival of features such as the panelled drawing room contributes to the building's character, although the extent of original interior fabric elsewhere is uncertain.

5.37 The architectural and artistic interest of the building is considered to be **medium** to **high**.

Historical interest

5.38 Horsford Hall has strong illustrative historical interest as a prominent house in the village, reflecting the development of Horsford as a rural settlement and its associated estate structure. Its evolution from an earlier core through 18th- and 19th-century alterations demonstrates changing architectural tastes and domestic requirements over time.

5.39 The building's association with the village contributes to its local historical importance, although there is no clear evidence of association with nationally significant individuals or events.

5.40 The historical interest of the building is considered to be **medium** to **high**.

Setting

5.41 Horsford Hall occupies a position on the south side of Church Street, forming part of a historic cluster focused around the parish church and its churchyard. The principal (north) elevation of the Hall faces directly onto Church Street and towards the church, establishing a strong and deliberate relationship between the two assets. This arrangement reflects the historic hierarchy and spatial organisation of the settlement, where the manor house and church form key focal points within a relatively contained village core.

5.42 The immediate setting of the Hall is therefore tight and enclosed, characterised by built form, boundary treatments and the defined edge of the street. This creates a highly focused and intimate setting, where the significance of the asset is primarily experienced through its direct relationship with Church Street and the adjacent ecclesiastical complex.



Figure 17 - Horsford Hall

Views within this setting are generally short-range and controlled, reinforcing the sense of enclosure and historic character.

5.43 To the rear (south) of the Hall lies a large garden area, which historic mapping indicates was previously laid out as formal gardens. This area contributes to the understanding of the Hall as a former manor house, illustrating its status and the extent of its domestic curtilage. However, this aspect of the setting is largely private and not publicly appreciable, being enclosed by boundary treatments including close-boarded fencing. As such, while it contributes to the evidential and historical significance of the asset, it plays a more limited role in its publicly experienced setting.

5.44 Beyond the immediate curtilage, the wider landscape transitions to more open agricultural land to the south. However, due to the enclosed nature of the Hall's immediate surroundings and the screening provided by boundary features, this wider landscape makes only a limited contribution to the way in which the asset is experienced.

5.45 Overall, the setting of Horsford Hall is defined primarily by its immediate, contained relationship with Church Street and the church, with secondary contributions from its historic garden to the rear.

Contribution of site to setting

5.46 Site B is located to the south of Horsford Hall, beyond the rear garden and separated from the asset by intervening land and boundary treatments.

5.47 There is no intervisibility between Site B and Horsford Hall. The Hall itself, and its associated garden, are not visible from Site B, nor is Site B visible from the Hall or from publicly accessible viewpoints within its immediate setting. This is due to a combination of distance, intervening landform, built form, vegetation, and boundary treatments, including the close-boarded fencing enclosing the rear garden of the Hall.

5.48 As set out above, the significance of Horsford Hall is derived principally from its architectural interest and its immediate, focused relationship with Church Street and the church. Its setting is therefore highly localised, and is not dependent on wider landscape views to the south for its appreciation or understanding.

5.49 While the rear garden contributes to the historical understanding of the Hall as a former manor house, this aspect of its setting is private, enclosed, and not publicly experienced. Site B lies beyond this area and does not form part of the designed or functional curtilage of the asset.

5.50 In this context, Site B does not contribute to the significance of Horsford Hall through its setting. The site does not form part of any key views to or from the asset, nor does it influence the way in which the Hall is experienced within its immediate historic context.

5.51 Accordingly, Site B is considered to make a **negligible** contribution to the setting and significance of Horsford Hall.

Summary

5.52 Overall, Horsford Hall is considered to hold a **moderate** level of significance.

Horsford Castle (Scheduled Monument)

5.53 Horsford Castle is a Scheduled Monument comprising a Norman motte and bailey earthwork located to the south-east of the site.

5.54 The monument dates to the late 11th or early 12th century and consists of a raised motte and enclosed bailey. Earthworks survive, although some have been affected by ploughing. The site may have included a stone keep and defensive features such as a barbican

Archaeological Interest

5.55 The monument has significant archaeological value as a well-preserved example of a Norman motte and bailey castle. It has high evidential potential for understanding medieval defensive structures and settlement patterns.

5.56 The archaeological interest is considered to be **very high**.

Architectural and artistic interest

5.57 As an earthwork monument, the castle has limited architectural interest in a conventional sense. However, its form and survival as a legible defensive structure contribute to its significance.

5.58 The architectural and artistic interest is considered to be **medium**.

Historical interest

5.59 The monument has strong historical interest, associated with the Norman Conquest and the establishment of feudal control. Possible links to the Malet family further enhance its significance.

5.60 The historical interest is considered to be **high**.

Setting

5.61 The setting is predominantly agricultural, with woodland and the village of Horsford nearby. While historic parkland features have largely been lost, the openness of the surrounding landscape retains a sense of isolation appropriate to the monument's original function.

5.62 The setting makes a **moderate beneficial** contribution.

Contribution of site to setting

5.63 Site A is approximately 640m away and has no meaningful visual or functional relationship with the monument. Vegetation and topography prevent intervisibility. Similarly, Site B is over 1km to the south west of the asset and has no relationship, being predoiminantly screened by Dairy Farm.

5.64 The sites makes a negligible contribution to the monument's setting.

Summary

5.65 Horsford Castle is of **high** significance, primarily due to its archaeological and historical value.



Figure 18 - Location of Horsford Castle

Barn behind No 106 Holt Road (Non Designated Asset)

5.66 The barn and associated cart shed are located to the rear of 106 Holt Road, Horsford. They are not statutorily listed but are considered non-designated heritage assets.

5.67 The barn is constructed of red brick with a pantile roof, likely originally thatched based on its pitch and gable form. The principal opening is located on the north elevation. The building has been extended, including a two-storey eastern extension and a full-length lean-to on the south side, both of which show evidence of alteration and reduce the legibility of the original form.

5.68 The cart shed is a detached structure aligned north–south, with a raised section likely used for storage. Alterations to openings and the upper hatch have diminished its historic character.

5.69 Historic mapping indicates the buildings formed part of a farmstead present by 1840, associated with a farmhouse, barn and stables.

5.70 Positive characteristics include the survival of the core barn structure and its relationship to the historic farmstead. Negative aspects include later alterations and extensions which detract from the original form, particularly to the cart shed.

Archaeological Interest

5.71 The site forms part of a historic farmstead with origins at least as early as the mid-19th century. While there is potential for below-ground remains associated with agricultural use, this is likely to be limited in scope and has been affected by later development and farming practices.

5.72 The archaeological interest is considered to be **low**.

Architectural and artistic interest

5.73 The barn is a modest example of a traditional agricultural building, reflecting local materials and construction techniques. However, its architectural interest has been reduced by later alterations and extensions. The cart shed retains some evidential value but has also been altered.

5.74 The architectural and artistic interest is considered to be **low**

Historical interest

5.75 The buildings have illustrative historical interest as part of a former farmstead, reflecting 19th-century agricultural practices and land ownership patterns. Documentary evidence provides some insight into their historic use, although this is limited.

5.76 Associative historical interest is limited.

5.77 The historical interest is considered to be **low**.

Setting

5.78 The immediate setting comprises the farmhouse at 106 Holt Road and associated outbuildings. The wider setting includes surrounding agricultural land and a modern agricultural unit.

5.79 The barn's position on a slight incline and proximity to the settlement edge allows it to read as part of the built form of Horsford, despite its agricultural function.

5.80 The setting is considered to make a **moderate beneficial** contribution to its significance.

Contribution of site to setting

5.81 Site A forms part of the agricultural land historically associated with the barn. While this provides a rural context, the loss of historic field boundaries and the presence of modern agricultural structures reduce the legibility of the historic landscape. Site B has no relationship with the barn.

5.82 The site makes a **low beneficial** contribution, with both positive and negative elements.



Figure 19 - Barns and cart shed to rear of 106 Holt Road

Summary

5.83 Overall, the barn and cart shed are considered to hold a low level of significance.

Former Deer Park (Non-Designated Heritage Asset)

5.84 The former deer park is a non-designated heritage asset identified through documentary and cartographic evidence, with origins likely in the medieval period.

5.85 Some earthworks and boundary features survive, although these are fragmentary. There is limited potential for below-ground remains.

5.86 The deer park has illustrative historical interest relating to medieval land use and estate management. Its significance is primarily derived from documentary evidence.

5.87 The former deer park is considered to hold a **low** level of significance.

Setting

5.88 The setting comprises the surrounding agricultural landscape and village. However, the historic park is no longer legible without reference to documentary sources.

5.89 The setting makes a **negligible** to **low** contribution to the asset's significance.

Contribution of site to setting

5.90 Site A lies within the historic extent of the deer park but does not retain visible features associated with it. Its contribution is therefore largely associative. Site B is beyond the medieval core of the village and has relationship to the asset.

5.91 The site makes a **low** to **negligible** contribution to the setting of the asset.

Summary

5.92 The former deer park is considered to hold a low level of significance.

PROPOSALS

6

6.0 Proposals

6.1 Site A extends to approximately 25 hectares. The site has the capacity to accommodate approximately 300 dwellings, alongside a community hub building, open space and landscaped areas. In addition, land within the parcel could be used to deliver Biodiversity Net Gain and contribute towards Nutrient Neutrality offsetting. The emerging proposals also include the provision of green infrastructure, forming the eastern section of a wider 'Green Ring' around the village.

6.2 Access to the site would be provided via a new junction off Holt Road, which would form part of the wider Transport Master Plan and associated traffic management measures.

6.3 Southern Site B would be accessed from Holt Road. The site's topography is well suited to the provision of sports pitches, and it has the capacity to accommodate a range of sports facilities. Broadland District Council has identified a need for additional sports pitches and associated facilities to serve both the parish and the wider area. In response, the Estate has identified a site in close proximity to Horsford Cricket Club and The Nest that could accommodate this requirement. The range of facilities could include a clubhouse, an artificial turf pitch, and a series of natural grass pitches to support adult and junior football. Supporting infrastructure, including car parking and landscaping, would also be incorporated, with planting designed to create a buffer between the site and the Broadland Northway.



Figure 20 - An Emerging Indicative Layout for Site A. (LDA, April 2026)

INITIAL IMPACT ASSESSMENT

7

7.0 Initial Impact Assessment

Initial Assessment

Parish Church of All Saints (Grade II*)

7.1 The church is of **high** significance, with its setting making a **moderate** contribution, including its relationship with the rural landscape to the north.

Location and Siting

7.2 Site A is located approximately 500m to the north of the church and forms part of its wider setting. Verified views from the churchyard demonstrate that the site is perceived as part of the distant rural horizon beyond intervening built form and vegetation, rather than as an immediate component of the church's foreground setting.

7.3 The emerging development framework shows that development would be contained within a defined area, with substantial green infrastructure, including a 'Green Ring', structural planting and open space, retained along the site boundaries . This approach maintains a degree of separation between the built form and the wider countryside, ensuring that the site continues to read as part of a layered landscape.

7.4 Site B is located to the south of the village and is physically and visually separated from the church by intervening development and topography. It does not form part of the church's experiential setting.

Form and Appearance

7.5 The emerging development framework at Site A comprises a moderate-density residential layout arranged in parcels, interspersed with green corridors, open space and landscape features. This pattern reflects the existing settlement grain and avoids the creation of a single dominant built mass.

7.6 In views from the church, development would be partially filtered by vegetation and perceived as an extension of the settlement edge, rather than as a prominent or isolated feature in the landscape. The retention of green infrastructure corridors would maintain visual permeability and glimpses of the wider countryside beyond.

7.7 Site B would comprise predominantly open sports pitches, with limited built form such as a clubhouse and ancillary infrastructure. While elements such as fencing and potential lighting columns may introduce vertical features, these would be experienced within a context already influenced by the Broadland Northway and adjacent land uses.

Other Effects

7.8 The development of Site A would result in a transition from agricultural land to residential use, altering the rural character of part of the church's wider setting. However, the incorporation of substantial green infrastructure, including open space, planting and SuDS features, would help to retain elements of the existing landscape character and soften the urban edge.

7.9 Lighting associated with residential development and sports uses may introduce some urbanising effects, particularly during hours of darkness. However, given the distance from the church and the presence of intervening vegetation and built form, these effects are likely to be limited.

7.10 Noise and activity levels would increase as a result of both residential and recreational uses, although these would not materially affect the experience of the church due to separation distance.

7.11 There remains potential for increased traffic movement through the historic core, including Church Road. This could incrementally affect the tranquillity of the church's immediate setting, although this would depend on traffic routing and management measures. This may be offset by benefits to the church in terms of visitors, particularly as the church already serves as informal village hub.

Conclusion

7.12 The allocation of Site A would result in a **low** level of harm to the significance of the church through changes to its wider rural setting, moderated by the containment of development and the incorporation of green infrastructure. Site B would have a **negligible** to **low** impact. Overall, the level of harm would be less than substantial in NPPF terms.

Horsford Hall (Grade II)

7.13 Horsford Hall is a Grade II listed building of **medium** to **high** significance, with a setting that is primarily localised and focused on Church Street and its immediate surroundings

Location and Siting

7.14 Site A has no relationship with the Hall and does not contribute to its setting. Site B lies to the south but is separated from the Hall by intervening land, vegetation and boundary treatments. There is no intervisibility between the site and the asset. There may be glimpses to the garden of the hall on the roundabout before approaching Site B but these are blocked by a close boarded fence.

Form and Appearance

7.15 The proposed use of Site B for sports pitches would introduce limited built form, which would not be visible from the Hall or affect its architectural appreciation.



Figure 21 - View from churchyard towards Site A, beyond the tree line.

Other Effects

7.16 The principal potential impact relates to increased activity and traffic associated with the sports hub, which may affect the tranquillity of the Hall's rear garden. However, this area is private and enclosed, and the asset's significance is primarily derived from its relationship with Church Street.

7.17 Increased traffic movements along local roads may have a minor adverse effect on the wider setting, although this would not materially affect the significance of the asset.

Conclusion

7.18 Site A would result in **no impact,** while Site B may give rise to a **negligible** to **low adverse** impact through secondary effects only.



Figure 22 - View from Site B facing towards Horsford Hall

Horsford Castle (Scheduled Monument)

7.19 Horsford Castle is a Scheduled Monument of **high** significance, with its value derived primarily from its archaeological and historical interest

Location and Siting

7.20 The monument is located approximately 640m from the sites and has no meaningful visual, spatial or functional relationship with either Site A or Site B. Intervening topography, vegetation and development prevent intervisibility.

Form and Appearance

7.21 Development within the sites would not be visible from the monument and would not affect its appreciation.

Other Effects

7.22 There may be minor increases in activity within the wider area; however, these would not affect the monument's significance or setting.

Conclusion

7.23 The proposed allocations would result in **no harm (neutral impact)** to the significance of Horsford Castle.

Barn and Cart Shed (Non-Designated Heritage Asset)

7.24 The barn and cart shed are non-designated heritage assets of **low** significance, with their setting making a **moderate** contribution to their value as part of a historic farmstead.

Location and Siting

7.25 The emerging development framework indicates that the barn would be integrated within the development area, likely forming part of the proposed community hub near the southern part of Site A. Its relationship with surrounding agricultural land would be altered, but its position within a focal area (community square/green) may reinforce its role as a landmark. The cart shed would likely need to be demolished to facilitate site access.

Form and Appearance

7.26 The introduction of surrounding residential development will change the barn's context from agricultural to semi-urban. However, the framework plan suggests a structured layout with open space and defined character areas, which could allow the barn to remain legible. It is noted that the barn, although adjoined agricultural land, was always closely located to the village core and residential development. The success of this will depend on the scale and design of adjacent buildings, which are not yet defined.

Other Effects

7.27 The shift to active community use would increase activity and movement around the asset. This would secure a viable use and ongoing maintenance, which is highly beneficial.

Conclusion

7.28 The development would result in some change to the setting of the barn, but the retention and reuse of the structure provide a clear opportunity for enhancement. The overall impact is therefore considered to be **beneficial**, subject to detailed design.

Former Deer Park (Non-Designated Heritage Asset)

7.29 The former deer park is a non-designated heritage asset of **low** significance, with very limited physical legibility

Location and Siting

7.30 Site A lies within the historic extent of the deer park. While surviving features are limited, the site forms part of its historic landscape context.

Form and Appearance

7.31 The introduction of residential development would further reduce the legibility of the historic parkland landscape. However, the inclusion of open space, green infrastructure and landscape corridors within the masterplan provides an opportunity to retain elements of openness and reflect historic landscape structure.

Other Effects

7.32 The transition from agricultural land to residential use would alter the historic landscape character. However, the proposed green infrastructure network offers opportunities to integrate interpretation or reference to the historic landscape, subject to further design.

Conclusion

7.33 The impact remains **low adverse,** but the framework plan indicates potential for partial mitigation through landscape design.

Summary

7.34 Overall, the level of harm identified is limited and primarily relates to changes within the wider landscape setting of certain assets. The masterplan demonstrates that impacts can be moderated through layout, landscape design and the integration of green infrastructure.

7.35 A more precise assessment will be prepared at the detailed planning application stage and when the following information is available:

- Building heights and architectural design
- Lighting strategy, particularly for sports pitches.
- Detailed landscape specification and planting maturity
- Confirmed traffic routing and volumes

ASSET	TYPE	POTENTIAL IMPACT
All Saints Church	Grade II*	Low adverse impact (less than substantial harm) through change to wider setting
Horsford Hall	Grade II	Neutral (Site A) and negligible to low adverse (Site B – secondary effects only)
Horsford Castle	Scheduled Monument	Neutral impact
Barn and Cart Shed	Non-designated heritage asset	Neutral to beneficial impact through retention and reuse
Former Deer Park	Non-designated heritage asset	Low adverse impact

Maximising Enhancements and Avoiding Harm

7.36 In accordance with the methodology set out in Historic England Advice Note 3, this section considers how the proposed site allocation could be refined to maximise enhancement and avoid or minimise harm to the significance of heritage assets.

7.37 The assessment recognises that, while some limited harm to the setting of certain heritage assets has been identified (notably the Parish Church of All Saints and the Former Deer Park), there are clear opportunities for design-led mitigation and enhancement through the masterplanning process.

Avoiding and Minimising Harm

Spatial Strategy and Layout

7.38 The emerging development framework already demonstrates a clear approach to locating development within the least sensitive areas of Site A, with substantial areas of green infrastructure retained around the site boundaries and along key corridors . This approach should be maintained and refined through subsequent design stages.

7.39 In particular, built development should remain contained within the defined development parcels, avoiding encroachment into the more sensitive edges of the site, particularly those forming part of the wider rural setting of the church.

7.40 The southern and eastern green infrastructure corridors should be retained and strengthened to preserve a sense of openness and separation between the development and the wider landscape.

7.41 The green corridor aligned with key movement routes and views should be designed to maintain filtered views toward the wider landscape, thereby preserving elements of the church's rural backdrop.

Scale, Massing and Design

7.42 Although detailed design parameters are not yet defined, future proposals should:

- Reflect the prevailing scale and grain of Horsford, avoiding overly prominent or visually intrusive built form on the settlement edge.
- Ensure that development at the eastern and southern edges of Site A is of a reduced scale and density, with building heights carefully controlled to minimise visibility in longer-distance views.
- Incorporate locally appropriate materials and architectural detailing, informed by the village's vernacular, to ensure that new development contributes positively to local character and distinctiveness, in line with national policy and Historic England advice.

Landscape and Visual Mitigation

7.43 Landscape design will play a critical role in mitigating potential impacts on heritage settings:

- Existing vegetation, including Diamond Jubilee Plantation and boundary planting, should be retained and supplemented with additional structural planting.
- A robust landscape buffer should be maintained along the southern boundary adjacent to the Broadland Northway and extended where appropriate to reinforce the rural edge.
- New planting should be designed to provide graduated screening, allowing filtered views rather than complete enclosure, thereby maintaining visual connectivity with the wider landscape.

Barn and Cart Shed

7.44 For the non-designated barn and cart shed:

- The retention and reuse of the barn as part of a community hub should be considered, ensuring that the building remains a legible and meaningful component of the site.
- Any new development in proximity should be carefully designed to respect the scale, form and setting of the historic structure, potentially reflecting the historic farmstead layout where appropriate.
- The immediate setting of the barn should retain some degree of openness to preserve its agricultural character, even within a developed context.

Archaeological Considerations

7.45 Although archaeological interest is generally low across the site, appropriate measures should be taken to:

- Undertake proportionate archaeological investigation, particularly in relation to any surviving features associated with the former deer park.
- Ensure that any identified remains are recorded and, where feasible, preserved in situ or incorporated into the design of open spaces.

Traffic and Movement

7.46 To address potential secondary impacts:

- Traffic management measures should seek to avoid unnecessary increases in vehicle movement through the historic core, particularly along Church Road.
- Enhanced pedestrian and cycle connectivity should be prioritised to reduce reliance on vehicular access and support sustainable movement patterns.

Maximising Enhancement

Green Infrastructure and Landscape Design

7.47 The proposed green infrastructure network provides a significant opportunity to enhance the setting of heritage assets:

7.48 The creation of a 'Green Ring' around the eastern edge of the village will reinforce the transition between built form and countryside, helping to maintain the rural character that contributes to the significance of nearby heritage assets.

7.49 Open spaces, SuDS features, and green corridors should be designed to reflect historic landscape patterns, where possible, and provide visual and experiential continuity with the surrounding countryside.

Interpretation and Public Engagement

7.50 Historic England, in their response to the Regulation 14 consultation, has highlighted the potential for enhanced interpretation of heritage assets, including the Scheduled Monument at Horsford Castle and associated features. In this context, there may be opportunities (subject to agreement with relevant landowners and stakeholders) to:

7.51 Provide interpretation within the development, such as signage, public art or naming strategies, referencing the historic deer park and wider medieval landscape.

7.52 Explore opportunities to improve awareness of nearby heritage assets, including Horsford Castle, for example through wayfinding or interpretation integrated into pedestrian and cycle routes.

7.53 Any such measures would be subject to further discussion and agreement and would not be reliant on land outside the applicant's control.

Enhancement of the Barn

7.54 The proposed reuse of the barn offers a clear heritage benefit, bringing the building into active and viable use will secure its long-term conservation.

7.55 Its incorporation as a community facility has the potential to strengthen local identity and connection to the site's historic use.

Reinforcing Local Character

7.56 The development provides an opportunity to:

- Create a scheme that is informed by the historic character of Horsford, including its settlement pattern, materials and landscape setting.
- Use the historic environment as a positive design driver, ensuring

that new development contributes to local distinctiveness, as encouraged by national policy and Historic England guidance .

Summary

7.57 The emerging development framework demonstrates that there is clear potential to avoid or minimise harm through careful design, layout and landscape strategy, while also delivering meaningful heritage enhancements.

7.58 Key mitigation measures include the containment of built development, retention and strengthening of green infrastructure, and sensitive design of development at site edges. Enhancement opportunities arise particularly through the reuse of the barn, the integration of green infrastructure, and the potential for interpretation of the historic environment.

7.59 Subject to the implementation of these principles through detailed design and future planning applications, the proposed allocation has the potential to accord with national policy objectives to conserve and, where appropriate, enhance the significance of heritage assets.

CONCLUSIONS

8

8.0 Conclusions

8.1 This Initial Heritage Assessment has been prepared by Bidwells on behalf of Endurance Estates Land Promotion Ltd (EELP) to support the promotion of two sites within the emerging Horsford Neighbourhood Plan: c.25ha of land to the east of the village centre (referred to in this assessment as 'Site A') – forming a draft allocation for approximately 300 dwellings and a community hub buildings, and c.10ha of land south of Holt Road ('Site B') – forming a draft allocation for a sports hub for sport and recreation uses.

8.2 The assessment provides a high-level appraisal of the heritage assets that have the potential to be impacted by the proposals to identify any potential built heritage opportunities and constraints for the sites.

8.3 This assessment has been undertaken in accordance with the methodology set out in Historic England Advice Note 3..

8.4 The assessment has demonstrated that there are no heritage assets within the site boundaries, but that a number of designated and non-designated assets lie within the surrounding area, including the Grade II* Parish Church of All Saints, the Scheduled Monument at Horsford Castle, the Grade II Horsford Hall, and non-designated assets comprising the barn and cart shed and the former deer park.

8.5 The principal impact arising from the proposed allocation relates to Site A, which forms part of the wider setting of the Parish Church of All Saints. Development of this site would introduce built form into an area currently characterised by open agricultural land, resulting in a change to the rural backdrop of the church. However, the assessment of verified views and the submitted masterplan demonstrates that the site is experienced as part of the distant and filtered landscape, and that development would be contained within a defined envelope, incorporating substantial green infrastructure and structural planting. As such, the resulting harm to the significance of the church would be limited and less than substantial in NPPF terms.

8.6 The allocation of Site B for sports and recreational uses would have a more limited effect on heritage assets. Due to its separation from the church and other designated assets, and the predominantly open nature of the proposed use, impacts would be negligible to low, with any effects largely confined to potential increases in activity and traffic within the wider area.

8.7 The impact on Horsford Hall would be neutral in respect of Site A, with only minor and indirect effects arising from Site B through potential changes in traffic and activity.

8.8 In relation to non-designated heritage assets, the proposed retention and reuse of the barn and cart shed presents a clear opportunity for enhancement, securing a viable long-term use and contributing positively to the character of the development. The impact on the former deer park would be limited to a low level of harm, reflecting its low significance and limited legibility, with opportunities for mitigation through landscape design.

8.9 The Scheduled Monument at Horsford Castle would experience no change to its setting or significance. There may be opportunities within the scheme to improve access and interpretation of this asset. Initial consultee comments from Historic England suggested they would "welcome improving public access to and from the village to these sites, or opportunities for interpretation of these scheduled monuments and their connection to Horsford".

8.10 Overall, the proposed allocation would result in no harm or, in some areas, low levels of less than substantial harm to the significance of heritage assets, primarily through changes to setting.

8.11 In accordance with the National Planning Policy Framework, such harm must be weighed against the public benefits of the proposal. These include the delivery of housing, the provision of new community and recreational facilities, the creation of green infrastructure, and the opportunity to secure the long-term conservation of the barn through reuse.

8.12 Furthermore, the emerging development framework demonstrates that there is clear scope to avoid or minimise harm through careful design, layout and landscape strategy, and to deliver heritage enhancements, in line with national policy and Historic England guidance. These can be further explored during design development.

8.13 Subject to the implementation of these principles at the detailed design stage, the proposed allocation is considered to represent a sustainable form of development that conserves the significance of heritage assets in a manner proportionate to their importance, and is therefore consistent with the objectives of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the National Planning Policy Framework.

APPENDICES

9

9.0 APPENDICES

APPENDIX A_HISTORIC ENGLAND RESPONSE TO THE REGULATION 14 CONSULTATION

Historic England

Our ref: PL00800291
Your ref:
Date: 14/01/2026

By e-mail to:
Ms Sarah Vergette
Clerk & RFO,
Horsford Parish Council

Direct Dial:
Mobile:

Dear Ms Vergette,

Ref: Horsford Neighbourhood Plan Regulation 14 Consultation

Historic England is the government's advisor on planning for the historic environment including the conservation and enhancement of heritage assets. We champion good design in historic places and support neighbourhood planning to achieve the most for their communities through their policies and allocations. As such our comments are limited to those areas where we have a remit and silence on other areas should not be treated as support or objection.

Your Neighbourhood Plan is an important opportunity to set the agenda for your place, setting out what is important about different aspects of the plan area or specific parts of it, and providing clear policy and guidance to decision makers – be the property owners, planners or developers – to guide how the place should develop over the course of the plan period.

It is the Parish Council's right to decide what planning matters you want to address in your plan so long as it delivers sustainable development and achieves basic conformance with the National Planning Policy Framework and Local Plan's strategic policies, Paragraph 203 of the National Planning Policy Framework (2024) sets out that Plans, including Neighbourhood Plans, should set out a positive strategy for the conservation and enjoyment of the historic environment.

You will need to demonstrate that your plan policies achieve this aim by considering their impacts on the historic environment of the plan areas and that it conforms with the Local Plan's strategic policies for heritage.

In particular, this strategy needs to take into account the desirability of sustaining and enhancing the significance of all types of heritage asset where possible, the need for new development to make a positive contribution to local character and distinctiveness; and ensure that it considers opportunities to use the existing historic environment to help reinforce this character of a place.

Where proposals affect heritage assets (including site allocations) you will need to show that the effect on the 'significance' of those assets has been understood. The NPPF places a high value on the conservation of designated heritage assets including protecting the contribution made by their settings.

Historic England, Brooklands, 24 Brooklands Avenue, Cambridge CB2 8BU
Telephone 01223 582749 | historicengland.org.uk

Historic England is subject to the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by us may therefore become publicly available. For information about our use of your personal data visit: historicengland.org.uk/ /privacy

Historic England

It also sets out a need to consider the effects on non-designated heritage assets, including the effect of development on their significance. Harm to their significance requires clear and convincing justification in planning decisions based on the public benefit that could not otherwise be delivered. Measures should be taken to avoid harm to their significance, or to minimise harm that can't be avoided.

We welcome the production of this neighbourhood plan and are pleased to see that the historic environment within your plan area features throughout your objectives and policies. We recognise the work that members of the steering group have carried out to prepare this draft neighbourhood plan and see that the document is supported by a Sustainability Appraisal considering the impacts of the allocation the Plan has made.

We are pleased to see that the historic environment features throughout the Plan thorough its background, objectives and policies. We further welcome that your Plan is supported by a Design Guidance and Code document and provides both clear guidance and illustrative example of local vernacular, materiality, palette, typography and height which should enable positive design informed by local character and context.

Site Allocation: Policy SS2A: New Development
Whilst there are no designated heritage assets within the site boundary, there are a number designated heritage assets nearby including the grade II* listed Church of All Saints across the valley to the south, together with a cluster of grade II listed buildings. Horsford Castle lies to the southeast of the site.

Whilst noting the Sustainability Appraisal concludes minor positive effects on the historic environment, and the proposed allocation is afforded a degree of screening from existing vegetation and buildings within Horsford, any development of the site has the potential to impact on the significance of these assets through development within their settings.

Given the scale of the proposed allocation, we recommend that a Heritage Impact Assessment (HIA) is carried out to inform the site selection and policy wording for potential site allocations. HIAs should follow the 5 step methodology set out on page 5 in our advice note, HEAN 3 on Site Allocations in Local Plans https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/.

HIAs should be proportionate (both to the scale of the site and the assets affected). The HIA should assess the suitability of the area for development and the impact on the historic environment. The HIA should consider both designated and non-designated heritage assets, built heritage and archaeology.

The assessment should consider if there are any key views from/to the assets, and if any landscaping/screening or open space is needed to protect the assets. Opportunities for enhancement should also be explored (e.g. better interpretation etc).

Historic England, Brooklands, 24 Brooklands Avenue, Cambridge CB2 8BU
Telephone 01223 582749 | historicengland.org.uk

Historic England is subject to the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by us may therefore become publicly available. For information about our use of your personal data visit: historicengland.org.uk/ /privacy

Should the HIA conclude that development in the area could be acceptable, and the site be allocated, the findings/recommendations of the HIA should inform the policy including development criteria and ideally a strategy/concept diagram which expresses the development criteria in diagrammatic form. It is helpful if the recommendations of the HIA are in short succinct bullet point form that can then be transferred across into policy criterion for sites.

If the steering group decides at this stage that is not appropriate or feasible to carry out a proportionate HIA now, then we strongly recommend amending the policy wording to explicitly require that any future planning applications for the site are accompanied by, and informed through, a proportionate HIA.

General Comments
Horsford Castle, and Two Round Barrows Scheduled Monuments:

While sited outside of any development boundary, we would support any opportunity presented via this plan or future development which explores unlocking wider heritage benefits. For example, we would welcome improving public access to and from the village to these sites, or opportunities for interpretation of these scheduled monuments and their connection to Horsford and the contribution they make to your Parish's historic environment.
We would suggest one minor amendment relating to terminology. There are references made to 'Scheduled Ancient Monuments' in the plan and Design Code. We recommend using Scheduled Monument as this is consistent with the NPPF.

We also recommend the inclusion of a glossary containing relevant historic environment terminology contained in the NPPF, in addition to details about the additional legislative and policy protections that heritage assets and the historic environment in general enjoys.

We refer you to our advice on successfully incorporating historic environment considerations into your neighbourhood plan, which can be found here:
https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/.

For any specific advice regarding the historic environment and how to integrate it into your neighbourhood plan. we recommend that you consult your local planning authority conservation officer, and if appropriate the Historic Environment Record at Norfolk County Council.

To avoid any doubt, this letter does not reflect our obligation to provide further advice on or, potentially, object to specific proposals which may subsequently arise as a result of the proposed plan, where we consider these would have an adverse effect on the historic environment.

Historic England, Brooklands, 24 Brooklands Avenue, Cambridge CB2 8BU
Telephone 01223 582749 | historicengland.org.uk

Historic England is subject to the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by us may therefore become publicly available. For information about our use of your personal data visit: historicengland.org.uk/ /privacy

Please do contact me, either via email or the number above, if you have any queries.

Yours sincerely,

[redacted]nd

Historic England, Brooklands, 24 Brooklands Avenue, Cambridge CB2 8BU
Telephone 01223 582749 | historicengland.org.uk

Historic England is subject to the Freedom of Information Act (2000) and Environmental Information Regulations (2004). Any information held by us may therefore become publicly available. For information about our use of your personal data visit: historicengland.org.uk/ /privacy

BIDWELLS

APPENDIX B_METHODOLOGY

Heritage Assets

A heritage asset is defined within the National Planning Policy Framework as "a building, monument, site, place, area or landscape identified as h*aving a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing)*" (NPPF Annex 2: Glossary).

'Designated' assets have been identified under the relevant legislation and policy including, but not limited to: World Heritage Sites, Scheduled Monuments, Listed Buildings, and Conservation Areas. 'Non-designated' heritage assets are assets which fall below the national criteria for designation.

The absence of a national designation should not be taken to mean that an asset does not hold any heritage interest. The Planning Policy Guidance (PPG) states that "*non-designated heritage assets are buildings, monuments, sites, places, areas or landscapes identified by plan-making bodies as having a degree of heritage significance meriting consideration in planning decisions, but which do not meet the criteria for designated heritage assets.*" (Paragraph: 039 Reference ID: 18a-039-20190723)

However, the PPG goes on to clarify that "a substantial majority of buildings have little or no heritage significance and thus do not constitute heritage assets. Only a minority have enough heritage significance to merit identification as non-designated heritage assets."

Meaning of Significance

The concept of significance was first expressed within the 1979 Burra Charter (Australia ICOMOS, 1979). This charter has periodically been updated to reflect the development of the theory and practice of cultural heritage management, with the current version having been adopted in 2013. It defines cultural significance as the "*aesthetic, historic, scientific, social or spiritual value for past, present or future generations. Cultural significance is embodied in the place itself, its fabric, setting, use, associations, meanings, records, related places and related objects. Places may have a range of values for different individuals or groups*" (Page 2, Article 1.2)

The NPPF (Annex 2: Glossary) also defines significance as "t*he value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting.*"

The British Standards BS7913 (2013) notes that "the attributes that combine to define the significance of a historic building can relate to it physical properties or to its context. There are many different ways in which heritage values can be assessed."

Significance can therefore be considered to be formed by a collection of values.

TABLE 01 ASSESSMENT OF SIGNIFICANCE

SIGNIFICANCE	CRITERIA	EXAMPLES
Very High	Building/site/area of international value.	World Heritage Sites, Grade I and II* Listed Buildings, Registered Park and Gardens, Conservation Areas, Scheduled Monuments (with discernible features/ feature above ground) and their settings which are of acknowledged outstanding/ exceptional evidential, aesthetic, historic and/or communal value(s) and/or international importance.
High	Building/site/area of national value.	Grade I and II* Listed Buildings, Registered Park and Gardens, Conservation Areas, Scheduled Monuments (with discernible features/feature above ground) and their settings which are of high evidential, aesthetic, historic and/or communal value(s).
Moderate	Building/site/area of national or local value	Grade II Listed Buildings, Registered Park and Gardens, Conservation Areas, Scheduled Monuments (with discernible features/feature above ground), other built assets (including locally listed buildings and non-designated assets) and their settings which are of good evidential, aesthetic, historic and/or communal value.
Low	Buildings/sites/areas of national and/or regional value, or local assets of identified significance	Grade II Listed Buildings, Registered Park and Gardens, Conservation Areas, Scheduled Monuments (with discernible features/feature above ground), other built assets (including locally listed buildings and non-designated assets and their settings low level of evidential, aesthetic, historic and/or communal value(s).
Negligible	Buildings/sites/areas with some evidence of value but in an incoherent or eroded form of local interest and generally with no statutory protection.	Assets which are of such limited evidential, aesthetic, historic and/or communal value(s) that this is not appreciable.
Neutral/ None	Buildings/sites/areas with no value.	Assets with no surviving heritage value. Buildings of no architectural or historical note.
Unknown	Buildings/sites/areas with an unknown value.	Built heritage assets with some hidden (i.e. inaccessible) potential for significance.

Assessment of Significance

It is important to be proportionate in assessing significance as required in both national policy and guidance as set out in paragraph 207 of the NPPF.

The Historic England document 'Conservation Principles' states that "*understanding a place and assessing its significance demands the application of a systematic and consistent process, which is appropriate and proportionate in scope and depth to the decision to be made, or the purpose of the assessment*."

The document goes on to set out a process for assessment of significance, but it does note that not all of the stages highlighted are applicable to all places/ assets.

- Understanding the fabric and evolution of the asset;
- Identify who values the asset, and why they do so;
- Relate identified heritage values to the fabric of the asset;
- Consider the relative importance of those identified values;
- Consider the contribution of associated objects and collections;
- Consider the contribution made by setting and context;
- Compare the place with other assets sharing similar values;
- Articulate the significance of the asset.

At the core of this assessment is an understanding of the value/significance of a place. There have been numerous attempts to categorise the range of heritage values which contribute to an asset's significance. Historic England Advice Note 12 '*Statement of Heritage Significance: Analysing Significance in Heritage Assets*' *2019* provides the following list articulated by PPG15 paragraph: 006 reference ID: 18a-006-20190723:

Archaeological interest - *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.*

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 skills, 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.*

The advice in this document, in accordance with the NPPF, emphasises that the level of detail in support of applications for planning permission and listed building consent should be no more than is necessary to reach an informed decision, and that activities to conserve the asset(s) need to be proportionate to the significance of the heritage asset(s) affected and the impact on that significance.

The British Standards set out a simpler approach which '*is to think of a historic building's significance as comprising individual heritage values'*. These could include townscape characteristics, artistic value, educational value and identity or belonging amongst others.

TABLE 02 ASSESSMENT OF CONTRIBUTION OF SETTING TO ASSET

CONTRIBUTION OF SETTING	EXAMPLES
High	The setting and / or aspects of the setting are fundamental to the key interest/s that define the significance of the heritage asset and is of potential high or very high significance in its own right. For example, a Registered Park and Garden with direct associations with a designated heritage asset.
Medium	Listed Buildings, Scheduled Monuments, Conservation Areas and built assets (including locally listed buildings and non-designated assets) that can be shown to have moderate qualities in their fabric or historical association. Registered Parks & Gardens, historic landscapes with reasonable coherence, integrity, time-depth or other critical factor(s).
Low	The setting and / or aspects of the setting make a slight contribution to the significance of the designated heritage asset, comprising features of low significance and has been subject to substantial loss and erosion of the baseline situation. The ability to appreciate the significance of the designated heritage asset has been severely diminished.
Negligible	The setting and / or aspects of the setting does not contribute to the significance of the designated heritage asset.
Neutral/ None	Contribution uncertain, more information required.

TABLE 03 ASSESSMENT OF CONTRIBUTION OF SITE TO SETTING

CONTRIBUTION OF SITE TO SETTING	EXAMPLES
Positive	The site and / or aspects of the site demonstrably contribute to the significance of the setting heritage asset or aid in the ability to appreciate inherent interest, value and significance.
Negative	The site and / or aspects of the site represent negative impingement which detracts from the significance of the designated heritage asset. The site reduces the ability to appreciate significance.
Neutral	A site which cannot be considered to contribute to the significance of the setting, either positively or negatively. There is no net impact.
None	The site makes no contribution to setting.

It is therefore clear that value-based assessment should be flexible in its application. It is important not to oversimplify an assessment and to acknowledge when an asset has a multi-layered value base, which is likely to reinforce its significance.

Contribution of setting/context to significance

In addition to the above values, the setting of a heritage asset can also be a fundamental contributor to its significance - although it should be noted that 'setting' itself is not a designation. The value of setting lies in its contribution to the significance of an asset. For example, there may be instances where setting does not contribute to the significance of an asset at all.

Historic England's Conservation Principles defines setting as "*an established concept that relates to the surroundings in which a place is experienced, its local context, embracing present and past relationships to the adjacent landscape."*

It goes on to state that "*context embraces any relationship between a place and other places. It can be, for example, cultural, intellectual, spatial or functional, so any one place can have a multi-layered context. The range of contextual relationships of a place will normally emerge from an understanding of its origins and evolution. Understanding context is particularly relevant to assessing whether a place has greater value for being part of a larger entity, or sharing characteristics with other places*" (page 39).

In order to understand the role of setting and context to decision-making, it is important to have an understanding of the origins and evolution of an asset, to the extent that this understanding gives rise to significance in the present. Assessment of these values is not based solely on visual considerations but may lie in a deeper understanding of historic use, ownership, change or other cultural influence – all or any of which may have given rise to current circumstances and may hold a greater or lesser extent of significance.

The importance of setting depends entirely on the contribution it makes to the significance of the heritage asset or its appreciation. It is important to note that impacts that may arise to the setting of an asset do not, necessarily, result in direct or equivalent impacts to the significance of that asset(s).

Where there is modern and recent development within their setting the analysis includes an assessment of whether this conserves, enhances or harms significance. An assessment also proportionately includes all the viewpoints necessary to assess impacts on the contribution made by setting to the significance of the heritage assets and the ability to appreciate that significance.

BIDWELLS

TABLE 04 ASSESSMENT OF HARM AND BENEFIT

CATEGORIES OF HARM AND BENEFIT	EXAMPLES	
Positive	The proposals enhance, benefit or better reveal significance	
Neutral	The proposals preserve or sustain significance, and no harm is caused	
Negative - Less Than Substantial Harm	**High**	Impacts will damage cultural heritage assets; result in the loss of the asset's quality and integrity; cause severe damage to key characteristic features or elements; almost complete loss of setting and/or context of the asset. The asset's integrity or setting is almost wholly destroyed or is severely compromised, such that the resource can no longer be appreciated or understood
	Medium	Moderate impact on the asset, but only partially affecting the integrity; partial loss of, or damage to, key characteristics, features or elements; substantially intrusive into the setting and/or would adversely impact upon the context of the asset; loss of the asset for community appreciation. The asset's integrity or setting is damaged but not destroyed so understanding and appreciation is compromised.
	Low	Some measurable change in assets quality or vulnerability; minor loss of or alteration to, one (or maybe more) key characteristics, features or elements; change to the setting would not be overly intrusive or overly diminish the context; community use or understanding would be reduced. The assets integrity or setting is damaged but understanding and appreciation would only be diminished not compromised
	Negligible	Barely discernible effect on baseline conditions but a slight adverse impact
Negative - Substantial Harm	**Total Loss**	Impacts will destroy cultural heritage assets resulting in their total loss
	Substantial	Impacts will severely damage cultural heritage assets resulting in their almost complete destruction.

Assessing Impact

It is evident that the significance/value of any heritage asset(s) requires clear assessment to provide a context for, and to determine the impact of, development proposals. Impact on that value or significance is determined by first considering the sensitivity of the receptors identified which is best expressed by using a hierarchy of value levels from none to very high.
The following tables illustrate how a level of significance is attributed, followed by the magnitude of the potential benefits or harm as a result of the proposed development in accordance with the NPPF.

Once there is an understanding of the asset's significance, the next stage is to assess the level of impact that any proposed works may have upon that significance. The NPPF states that impacts may result in No Harm, Less than Substantial Harm or Substantial Harm. Historic England state that a positive impact should also be considered. Recent High Court Decisions have confirmed that enhancement to the historic environment should be considered as a public benefit under the provisions of Paragraphs 214 and 215.

It should be noted that impact on setting is measured in terms of the effect that the impact has on the significance of the asset itself – rather than setting itself being considered as the asset.

Where relevant. an assessment of sensitivity may also be undertaken which is based upon the vulnerability of an asset in part or as a whole, to loss of value through change. Sensitivity to change can be applied to individual elements of a building, or its setting, and may differ across the asset. This sensitivity can be measured as **low** (where a change may pose no appreciable threat), **medium** (where a change may diminish the heritage value of an asset), or **high** (where a change may pose a major threat to a specific heritage value of the asset which would lead to substantial or total loss of heritage value).

An asset's sensitivity level also relates to its capacity to absorb change, either change affecting the asset itself or change within its setting (remembering that, according to Historic England The Setting of Heritage Assets – Planning Note 3, 'change' does not in itself imply harm, and can be neutral, positive or negative in effect).

Some assets are more robust than others and have a greater capacity for change and therefore, even though substantial changes are proposed, their sensitivity to change or capacity to absorb change may still be assessed as low.

Summary of Assessment

Overall, it is a balanced understanding of the foreseeable likely effect of proposals on significance as a result of predicted impacts which is being sought through undertaking this process. It should be clearly understood that the level of detail provided within these assessments is "*proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance*" as set out in Paragraph 207 of the National Planning Policy Framework.

Research Methodology

This Heritage Statement is the result of a robust process which assesses relevant documentary research, including Historic Environment Records, historic maps, drawings and reports, as well as archive material where relevant and professional judgment.

APPENDIX C_HERITAGE LEGISLATION, POLICY AND GUIDANCE SUMMARY

Planning (Listed Buildings & Conservation Areas) Act 1990

The primary legislation relating to Listed Buildings and Conservation Areas is set out in the Planning (Listed Buildings & Conservation Areas) Act 1990.

- Section 16(2) states "In considering whether to grant listed building consent for any works the local planning authority or 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."
- Section 66(1) reads: "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."
- In relation to development on land within Conservation Areas, Section 72(1) reads: "Special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area."

As the proposal is not an application for Listed Building Consent and is not within a Conservation Area, Sections 16(2) and 72(1) do not apply in this instance.

National Planning Policy Framework (2024)

The National Planning Policy Framework (NPPF) was revised in December 2024. With regard to the historic environment, the over-arching aim of the policy remains in line with philosophy of the 2012 framework, namely that "*our historic environments... can better be cherished if their spirit of place thrives, rather than withers.*" The relevant policy is outlined within chapter 16, 'Conserving and Enhancing the Historic Environment'. This chapter reasserts that heritage assets can range from sites and buildings of local interest to World Heritage Sites considered to have an Outstanding Universal Value. The NPPF subsequently requires these assets to be conserved in a "*manner appropriate to their significance*" (Paragraph 202).

NPPF directs local planning authorities to require an applicant to *"describe the significance of any heritage assets affected, including any contribution made by their setting" and the level of detailed assessment should be "proportionate to the assets' importance*" (Paragraph 207).

Paragraph 208 states that the significance any heritage asset that may be affected by a proposal should be identified and assessed. This includes any assets affected by development within their settings. This Significance Assessment should be taken into account when considering the impact of a proposal, "t*o avoid or minimise conflict between the heritage asset's conservation and any aspect of the proposal*". This paragraph therefore results in the need for an analysis of the impact of a proposed development on the asset's relative significance, in the form of a Heritage Impact Assessment.

Paragraph 211 states that local planning authorities should have regard to the importance of the retention 'in-situ' of a historic statue, plaque, memorial or monument irrespective of its designation. The paragraph goes on to suggest an explanation of historic or social context should be given rather than removal.

Paragraph 212 requires that "*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.*"

It is then clarified that any harm to the significance of a designated heritage asset, either through alteration, destruction or development within its setting, should require, "*clear and convincing justification*" (Paragraph 213). This paragraph outlines that substantial harm to grade II listed heritage assets should be exceptional, rising to 'wholly exceptional' for those assets of the highest significance such as scheduled monuments, Grade I and grade II* listed buildings or registered parks and gardens as well as World Heritage Sites.

In relation to harmful impacts or the loss of significance resulting from a development proposal, Paragraph 214 states the following:

"*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."*

The NPPF therefore requires a balance to be applied in the context of heritage assets, including the recognition of potential benefits accruing from a development. In the case of proposals which would result in "less than substantial harm", paragraph 215 provides the following: *"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*."

It is also possible for proposals, where suitably designed, to result in no harm to the significance of heritage assets.

In the case of non-designated heritage assets, Paragraph 216 requires a Local Planning Authority to make a "balanced judgement" having regard to the scale of any harm or loss and the significance of the heritage asset. The NPPF therefore recognises the need to clearly identify relative significance at an early stage and then to judge the impact of development proposals in that context.

With regard to Conservation Areas and the settings of heritage assets, paragraph 219 requires Local Planning Authorities to look for opportunities for new development, enhancing or better revealing their significance. Whilst it is noted that not all elements of a Conservation Area will necessarily contribute to its significance, this paragraph states that *"proposals that preserve those elements of a setting that make a positive contribution to the asset (or better reveal its significance) should be treated favourably*."

Broader design guidance is given in Chapter 12, 'Achieving well-designed places'. The 2021 NPPF introduced the requirement for local authorities to prepare design guides or codes, consistent with the principles set out in the National Design Guide and National Model Design Code Documents. These should reflect 'local character' in order to create 'beautiful and distinctive places' (paragraph 133).

Paragraph 139 states that significant weight should be given to development which reflects local design polices, and/or outstanding or innovative designs which promote high levels of sustainability or help raise the 'standard of design' providing they conform to the 'overall form and layout of their surroundings.

Planning Practice Guidance (PPG) (2019)

The Planning Practice Guidance (PPG) was updated on 23 July 2019 and is a companion to the NPPF, replacing a large number of foregoing Circulars and other supplementary guidance.

In respect of heritage decision-making, the PPG stresses the importance of determining applications on the basis of significance and explains how the tests of harm and impact within the NPPF are to be interpreted.

In particular, the PPG notes the following in relation to the evaluation of harm: "in *determining whether works to a listed building constitute substantial harm, an important consideration would be whether the*

adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset's significance rather than the scale of the development that is to be assessed. The harm may arise from works to the asset or from development within its setting." (Ref ID: 18a-018-20190723).

This guidance therefore provides assistance in defining where levels of harm should be set, tending to emphasise substantial harm as a "high test".

In relation to non-designated heritage assets, the NPPG explains the following:

"*Non-designated heritage assets are buildings, monuments, sites, places, areas or landscapes identified by plan-making bodies as having a degree of heritage significance meriting consideration in planning decisions, but which do not meet the criteria for designated heritage assets.*"

It goes on to clarify that: "*A substantial majority of buildings have little or no heritage significance and thus do not constitute heritage assets. Only a minority have enough heritage significance to merit identification as non-designated heritage assets.*"

This statement explains the need to be judicious in the identification of value and the extent to which this should be applied as a material consideration and in accordance with Paragraph 197.

Historic England Conservation Principles: Policies and Guidance 2008

Historic England sets out in this document a logical approach to making decisions and offering guidance about all aspects of the historic environment, including changes affecting significant places. It states that:

"New work or alteration to a significant place should normally be acceptable if: a. there is sufficient information comprehensively to understand the impacts of the proposal on the significance of the place; b. the proposal would not materially harm the values of the place, which, where appropriate, would be reinforced or further revealed; c. the proposals aspire to a quality of design and execution which may be valued now and in the future; d. the long-term consequences of the proposals can, from experience, be demonstrated to be benign, or the proposals are designed not to prejudice alternative solutions in the future" (page 59).

Historic England Making Changes to Heritage Assets Advice Note 2 (February 2016)

This advice note provides information on repair, restoration, addition and alteration works to heritage assets. It advises that *"The main issues to consider in proposals for additions to heritage assets, including new development in conservation areas, aside from NPPF requirements such as social and economic activity and sustainability, are proportion, height, massing, bulk, use of materials, durability and adaptability, use, enclosure, relationship with adjacent assets and definition of spaces and streets, alignment, active frontages, permeability and treatment of setting.*" (page 10)

Historic England Managing Significance in Decision Taking in the Historic Environment Historic Environment Good Practice Advice (GPA) in Planning Note 2 (March 2015)

This advice note sets out clear information to assist all relevant stake holders in implementing historic environment policy in the National Planning Policy Framework (NPPF) and the related guidance given in the Planning Practice Guidance (PPG). These include: "*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.*" (page 1)

Historic England The Setting of Heritage Assets Historic Environment Good Practice Advice (GPA) in Planning Note 3 (Second Edition) (December 2017)

This document presents guidance on managing change within the settings of heritage assets, including archaeological remains and historic buildings, sites, areas and landscapes. Page 6, entitled: *'A staged approach to proportionate decision taking' provides detailed advice on assessing the implications of development proposals and recommends the following broad approach to assessment, undertaken as a series of steps that apply equally to complex or more straightforward cases:*

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'

GPA 3 also provides two checklists against which a setting can be assessed:

Assessment Step 2 Checklist

The starting point for this stage of the assessment is to consider the significance of the heritage asset itself and then establish the contribution made by its setting. The following is a (non-exhaustive) check-list of potential attributes of a setting that may help to elucidate its contribution to significance. It may be the case that only a limited selection of the attributes listed is likely to be particularly important in terms of any single asset.

The asset's physical surroundings

- Topography
- Aspect
- Other heritage assets (including buildings, structures, landscapes, areas or archaeological remains)
- Definition, scale and 'grain' of surrounding streetscape, landscape and spaces
- Formal design eg hierarchy, layout
- Orientation and aspect
- Historic materials and surfaces
- Green space, trees and vegetation
- Openness, enclosure and boundaries
- Functional relationships and communications
- History and degree of change over time

Experience of the asset

- Surrounding landscape or townscape character
- Views from, towards, through, across and including the asset
- Intentional intervisibility with other historic and natural features
- Visual dominance, prominence or role as focal point
- Noise, vibration and other nuisances
- Tranquillity, remoteness, 'wildness'
- Busyness, bustle, movement and activity
- Scents and smells
- Diurnal changes
- Sense of enclosure, seclusion, intimacy or privacy
- Land use
- Accessibility, permeability and patterns of movement
- Degree of interpretation or promotion to the public
- Rarity of comparable survivals of setting
- Cultural associations
- Celebrated artistic representations
- Traditions

Figure 23 - Extract from Historic England GPA3, page 11



Assessment Step 3 Checklist

The following is a (non-exhaustive) check-list of the potential attributes of a development affecting setting that may help to elucidate its implications for the significance of the heritage asset. It may be that only a limited selection of these is likely to be particularly important in terms of any particular development.

Location and siting of development
- Proximity to asset
- Position in relation to relevant topography and watercourses
- Position in relation to key views to, from and across
- Orientation
- Degree to which location will physically or visually isolate asset

Form and appearance of development
- Prominence, dominance, or conspicuousness
- Competition with or distraction from the asset
- Dimensions, scale and massing
- Proportions
- Visual permeability (extent to which it can be seen through), reflectivity
- Materials (texture, colour, reflectiveness, etc)
- Architectural and landscape style and/or design
- Introduction of movement or activity
- Diurnal or seasonal change

Wider effects of the development
- Change to built surroundings and spaces
- Change to skyline, silhouette
- Noise, odour, vibration, dust, etc
- Lighting effects and 'light spill'
- Change to general character (eg urbanising or industrialising)
- Changes to public access, use or amenity
- Changes to land use, land cover, tree cover
- Changes to communications/accessibility/ permeability, including traffic, road junctions and car-parking, etc
- Changes to ownership arrangements (fragmentation/permitted development/etc)
- Economic viability

Permanence of the development
- Anticipated lifetime/temporariness
- Recurrence
- Reversibility

Figure 24 - Extract from Historic England GPA3, page 13

Historic England Analysing Significance in Heritage Assets Advice Note 12 (October 2019)

This document provides guidance on the NPPF requirement for applicants to describe heritage significance in order to aid local planning authorities' decision making. It reiterates the importance of understanding the significance of heritage assets, in advance of developing proposals. This advice note outlines a staged approach to decision-making in which assessing significance precedes the design and also describes the relationship with archaeological desk-based assessments and field evaluations, as well as with Design and Access Statements.

Local Policy

The Greater Norwich Development Plan, Policy 3 (Environmental Protection & Enhancement) stipulates the following:
- Avoiding harm to both designated and non-designated heritage assets and their settings
- Requiring heritage impact assessments where significant effects may arise
- For unavoidable harm, applying the NPPF balance test (public benefits vs harm)
- Encouraging heritage interpretation measures to improve understanding of local heritage

Policy EN5 of the Broadland Development Management DPD requires development proposals to conserve or enhance the significance of heritage assets, including their setting. This is supported by Policy GC4, which seeks high quality design that responds to local character, and Policy EN2, which protects landscape character. These policies are consistent with the NPPF and form the basis of the assessment below.

APPENDIX D_LIST DESCRIPTIONS

PARISH CHURCH OF ALL SAINTS

Listed Building
*Grade: II**
List Entry Number: 1170781
Date first listed: 10-May-1961
List Entry Name: PARISH CHURCH OF ALL SAINTS
Statutory Address 1: PARISH CHURCH OF ALL SAINTS, CHURCH STREET
County: Norfolk
District: Broadland (District Authority)
Parish:Horsford
National Grid Reference: TG 19684 15379
*G.V. II**

Parish Church, medieval and later. Flint, flint and brick render, with stone dressings. Roofs of pantiles and thatch. West tower, north aisle, south porch, nave and chancel. 3 stage tower of 1456 with diagonal buttresses and stair turret to north east. 2-light Perpendicular west window. Squared traceried sound holes with hood moulds. 2-light bell openings with Reticulated tracery. Battlemented flushwork parapet. North aisle, 1869, gabled to east and west. 3 bays. Rectangular headed windows of 2 and 3 lights with Reticulated style tracery. Parapet gables. C20 boiler house at its west end. C13 doorway to north at west end of nave. C19 south porch in Perpendicular style. 4 bay nave with 3-light Perpendicular windows with rectangular heads, and flowing tracery containing central quatrefoil. The outer windows appear heavily restored. One bay chancel, mostly rendered, but with the date 1705 in the flintwork of the gable. Double lancet to north, and 3-light stepped lancets to east. Central southern priest's door with small rectangular chamfered window to its west. Parapet gables. Interior mainly C19. The tower arch has 3 components, from probably at least 2 builds. C15 stair tower door with studded cover strips. Stoup to east of south door. C19, 3 bay north arcade. C19 scissor trussed roofs. C19 chancel arch. Tomb recess in north chancel wall. C13 piscina with cusped head. Stone battlemented candle holder on north wall. Heavily restored C15 screen. C20 altar rails using late C17 stair balusters. C12 font. Rectangular bowl of Purbeck Marble with blind arcade, on 5 columns on modern base. Medieval glass fragments in south nave window. South east nave window by Zettler of Munich c.1893. Wall monument to Jane Maria Day, died 1777 by J. Wilton. Urn on plinth with a wreath. Bequests of 1447, 1457, 1471 and 1473 for "Reparation of Church and Tower". Norfolk Archaeology. Vol. XXXVIII part III.
Listing NGR: TG1968415379

HORSFORD HALL

Listed Building
Grade:II
List Entry Number:1051544
Date first listed:19-Jan-1952
List Entry Name:Horsford Hall
Statutory Address 1:HORSFORD HALL, CHURCH STREET
County:Norfolk
District:Broadland (District Authority)
Parish:Horsford
National Grid Reference:TG 19690 15321
Details
TG 11 NE HORSFORD CHURCH STREET (south side)
G.V. II

Former manor house, mainly C18, but with evidence of earlier core. Built of red brick, colourwashed brick and rendered brick, with pantiled roof. Symmetrical plan with double pile 2 storey wing linked to single storey hipped pavilion. North facade to road, 5 bays with central door. Existing doors and windows inserted over earlier 6 bay facade when the building was stuccoed in the early C19. The stucco has been removed c.1975 revealing the gauged brick arches of the earlier windows, and possibly some early C17 brickwork. Present sash windows have glazing bars, timber architraves and rendered lintels in the form of skewback arches. 6 panel entrance door with semi-circular fanlight with radial glazing bars and timber doorcase with panelled reveals, fluted frieze and cornice. Plain eaves cornice and stuccoed parapet. Rear elevation 5 bays with central door with open pedimented doorcase on consoles. Semi-circular fanlight with Reticulated tracery. Part glazed entrance door. Sash windows with glazing bars and flat gauged brick arches. Timber modillion cornice and brick parapet eaves. Double parapet gables, each with end stack. Links to north have single semi-circular arched recesses to plinth level now with semi-circular casement windows. Pavilion have blind semi-circular arches facing each other to east and west. Each pavilion at the rear has 3 storey height openings with gauged brick semi-circular arches, containing central double glazed doors, flanked by windows, all with glazing bars. Fine panelled drawing room. Lean-to buildings attached at east, not of special interest.

Listing NGR: TG1969015321

Disclaimer: Use of Artificial Intelligence
This report has been produced with the assistance of artificial intelligence (AI) tools. All AI-assisted outputs have been subject to human review and Bidwells retains full professional responsibility for the advice contained herein.

AI systems used in the production of this report are subject to appropriate governance, risk assessment, and oversight. Any personal data or confidential information has been handled in accordance with applicable data protection legislation, RICS requirements, and our Data Protection Policy.

This disclaimer is issued in accordance with the RICS *Responsible Use of Artificial Intelligence in Surveying Practice* professional standard (effective 9 March 2026).

BIDWELLS

Bidwells is a trading name of Bidwells LLP,
a limited liability partnership, registered
in England and Wales with number
OC344553. Registered office: Bidwell House,
Trumpington Road, Cambridge CB2 9LD