

12.0 CULTURAL HERITAGE

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12.1 Introduction

SCOPE OF THIS REPORT

Description of the proposed development

- 12.1.1 This report, commissioned by Breedon Trading Ltd, presents the findings of a cultural heritage desk-based assessment, fieldwalking, geophysical survey and trial trenching for proposed gravel extraction at Haddiscoe, Norfolk (**Figures 12.1 and 12.2**).
- 12.1.2 The working scheme is described in detail elsewhere in the Planning Statement and Chapter 3 of this Environmental Statement.
- 12.1.3 In brief, the Proposed Development Area (PDA) contains around 650,000 tonnes of gravel that will be extracted dry (i.e. no dewatering). Sand will be extracted, but not be processed, and will be retained on site as restoration backfill. The gravel, once dug, is dry screened at the face to remove the waste sand. The screened gravel is transported to the existing Norton Subcourse quarry for further processing. Access/egress is via the Crab Apple Lane onto the B1136.
- 12.1.4 Restoration will be to lower-level agriculture with no imported fill (**Figure 12.2**).
- 12.1.5 The PDA extends to approximately 21.5 hectares of agricultural land and peripheral woodland screening, and is centred at approximately TM 4390 9730.

Setting and geology

- 12.1.6 Haddiscoe lies within the Broadland region, to the west of a series of low-lying marshes that flank the River Waveney. The village lies on a strip of higher ground between marshes to the north and a minor water course, the Landspring Beck, to the south. The PDA lies to the north-west of the village, on land that rises gently towards to the west and south, reaching a maximum elevation of approximately 15m OD.
- 12.1.7 The underlying geological deposits are characterised by glacial sands and gravels, the PDA lying to the east of the boulder clay plateau that dominates

the geology of southern Norfolk (Funnell 2005). The underlying solid geology of the area consists of chalk (BGS 1985).

- 12.1.8 The character of this area was dramatically changed during the Roman period when a phase of marine transgression led to the formation of a large estuary at the mouth of the Bure and Yare rivers. These estuarine conditions extended as far as Haddiscoe, flooding the area of the present-day marshes. Peat deposits contemporary with the pre-Roman landscape now lie buried beneath large quantities of alluvial silt and clay, deposited as the marine water receded (Murphy 2005¹).

Scope of cultural heritage

- 12.1.9 Cultural heritage is represented by a wide range of features that result from past human use of the landscape. These include historic structures, many still in use, above ground and buried archaeological monuments and remains of all periods, artefacts of anthropological origin and evidence that can help reconstruct past human environments. In its broadest form cultural heritage is represented by the landscape and townscape itself.
- 12.1.10 The report considers both direct and indirect effects upon cultural heritage. Indirect effects can occur as a result of significant changes to the setting of a landscape or asset, whether permanent or temporary. This is particularly relevant to designated cultural heritage assets such as World Heritage Sites, Scheduled Monuments, Listed Buildings, Conservation Areas and Registered Parks and Gardens.

DESK-BASED RESEARCH

- 12.1.11 In order to assess the effects of the proposed scheme, cultural heritage information within and up to 2km from the boundary of the PDA was examined.
- 12.1.12 A variety of sources were consulted including the Norfolk Historic Environment Record, the Historic England Archive, DEFRA Magic, an examination of historical works and readily available local history materials,

¹ Murphy, P. 2005. 'Coastal Change and Human Response' in Ashwin, T. and Davison, A. (eds) *An Historical Atlas of Norfolk*. Phillimore. 6–7.

and archaeological assessments carried out in connection with previous planning proposals.

- 12.1.13 The research has been undertaken by Andrew Josephs and the former Norfolk Archaeological Unit. All work has been undertaken in accordance with *Standard and Guidance for Archaeological Desk-Based Assessment* (Chartered Institute for Archaeologists 2008, revised 2012).

FIELD-BASED RESEARCH

- 12.1.14 Geophysical survey was carried out by NPA Archaeology in 2008. Field walking and trial-trenching was undertaken by the former Norfolk Archaeological Unit in 2009.

RELEVANT LEGISLATION, POLICY AND GUIDANCE

Historic Environment Statutory Legislation

- 12.1.15 The importance of cultural heritage is clearly recognised at both national and local levels. **Table 12.1** summarises the statutory legislation relating to the historic environment relevant to this study.

Table 12.1 Historic Environment Statutory Legislation

Legislation	Key Issues
Burial Act (1857)	Under Section 25 of the 1857 Act, it is a criminal offence to remove human remains from any place of burial without a licence from the Ministry of Justice.
Ancient Monuments and Archaeological Areas Act (1979)	It is a criminal offence to carry out any works on or near to a Scheduled Ancient Monument without a Scheduled Monument Consent.
Protection of Military Remains Act (1986)	The Act outlines the criteria for designating a military crash site. Certain activities are prohibited at protected sites, without the authority of the Secretary of State.
Planning (Listed Buildings and Conservation Areas) Act (1990)	No works can be carried out in relation to a listed building without listed building consent. Designation of an area as a 'conservation area' introduces general controls over demolition and development within that area.
Treasure Act (1996)	The 1996 Act defines 'Treasure' as any object that is at least 10% gold or silver, associated coins or groups of coins which are over 300 years old, objects formerly classed as 'treasure trove' (i.e. deliberately deposited

	items with a high content of gold or silver) and any objects found in association with the above. Any find of 'Treasure' must be reported to the local Coroner.
Hedgerow Regulations (1997)	It is against the law to remove most countryside hedgerows without permission. A local authority can prohibit the removal of an 'important' hedgerow. The 1997 Regulations define the criteria for determining whether a hedgerow is important, and these include historical and archaeological criteria.

National Policy and Guidance

12.1.16 In accordance with the Town and Country (Environmental Impact Assessment) Regulations 2017, the significance of an effect should be identified as part of heritage assessments. This is achieved using a combination of the following published guidance and professional judgement.

- National Planning Policy Framework, updated 2021. Department for Communities and Local Government.
- Planning Practice Guidance, updated 2019: *Conserving and Enhancing the Historic Environment* <http://planningguidance.planningportal.gov.uk>
- Historic England² 2008. *Conservation Principles: Policies and Guidance for the Sustainable Management of the Historic Environment*.
- Historic England 2017. *The Setting of Heritage Assets* (GPA3)
- Historic England 2019 *Statements of Heritage Significance* (HE Advice Note 12)
- Historic England 2020 *Mineral Extraction and Archaeology* (HE Advice Note 13)

National Planning Policy Framework

12.1.17 National planning policy on how cultural heritage should be assessed is given in the National Planning Policy Framework, updated in 2021. This covers all aspects of heritage and the historic environment, including world heritage sites, scheduled monuments, listed buildings, conservation areas, registered

² Historic England includes its former name English Heritage

parks and gardens, battlefields and archaeology. Of particular relevance to this application are:

194. In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

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

196. Where there is evidence of deliberate neglect of, or damage to, a heritage asset, the deteriorated state of the heritage asset should not be taken into account in any decision.

197. In determining applications, local planning authorities should take account of:

- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
- b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and*

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

198. In considering any applications to remove or alter a historic statue, plaque, memorial or monument (whether listed or not), local planning authorities should have regard to the importance of their retention in situ and, where appropriate, of explaining their historic and social context rather than removal.

Considering potential impacts

199. 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.

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

- a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;*
- b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.³*

201. 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

³ Non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets.

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.*

202. 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.

203. The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

204. Local planning authorities should not permit the loss of the whole or part of a heritage asset without taking all reasonable steps to ensure the new development will proceed after the loss has occurred.

205. Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.

Planning Practice Guidance (PPG) Conserving and Enhancing the Historic Environment

12.1.18 Planning Practice Guidance (PPG) Conserving and Enhancing the Historic Environment was published in April 2014 (updated in 2019) as a companion to the NPPF, replacing previous 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.

12.1.19 In particular, the PPG includes the following in relation to the evaluation of significance and harm:

“Heritage assets may be affected by direct physical change or by change in their setting. Being able to properly assess the nature, extent and importance of the significance of a heritage asset, and the contribution of its setting, is very important to understanding the potential impact and acceptability of development proposals.

Whether a proposal causes substantial harm will be a judgment for the decision taker, having regard to the circumstances of the case and the policy in the National Planning Policy Framework. In general terms, substantial harm is a high test, so it may not arise in many cases. For example, 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.

What matters in assessing whether a proposal might cause harm is the impact on the significance of the heritage asset. As the National Planning Policy Framework makes clear, significance derives not only from a heritage asset’s physical presence, but also from its setting.

Proposed development affecting a heritage asset may have no impact on its significance or may enhance its significance and therefore cause no

harm to the heritage asset. Where potential harm to designated heritage assets is identified, it needs to be categorised as either less than substantial harm or substantial harm (which includes total loss) in order to identify which policies in the National Planning Policy Framework apply.

Within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated.

Historic England: The Setting of Heritage Assets (GPA3)

12.1.20 This Good Practice Advice Note published in 2017 observes that amongst the Government's planning objectives for the historic environment is that conservation decisions are based on the nature, extent and level of a heritage asset's significance and are investigated to a proportionate degree. Historic England recommends the following broad approach to assessment, undertaken as a series of steps that apply proportionately to complex or more straightforward cases:

- Step 1: identify which heritage assets and their settings are affected;
- Step 2: assess whether, how and to what degree these settings make a contribution to the significance of the heritage asset(s);
- Step 3: assess the effects of the proposed development, whether beneficial or harmful, on that significance;
- Step 4: explore the way to maximise enhancement and avoid or minimise harm;
- Step 5: make and document the decision and monitor outcomes.

These steps have been followed in the assessment below.

Local Planning Policy: Norfolk County Council Minerals and Waste Policy

12.1.21 The Norfolk Minerals and Waste Development Plan (2010-2026) consists of three documents:

1. The Norfolk Core Strategy and Minerals and Waste Development Management Policies Development Plan Document (DPD) (the 'Core Strategy'), which was adopted in September 2011.
2. The Norfolk Minerals Site Specific Allocations DPD, which was adopted in 2013. In December 2017 this was amended by the adoption of a Single Issue Silica Sand Review.
3. The Norfolk Waste Site Specific Allocations DPD, which was also adopted in 2013.

12.1.22 The 2010-2026 Core Strategy includes policies directly relating to cultural heritage. These are set out below:

Policy CS14 – Environmental protection (taken from Norfolk County Council 2011, 61-62)

“The protection and enhancement of Norfolk’s natural and built environments is a vital consideration for future minerals extraction and associated development and waste management facilities in the county. In particular, developments must ensure that there are no unacceptable adverse impacts on, and ideally improvements to:

- *Natural resources, including water, air and soil;*
- *The character and quality of the landscape and townscape, including nationally designated landscapes (the Norfolk Coast Area of Outstanding Natural Beauty and the Norfolk and Suffolk Broads);*
- *Biodiversity and geodiversity, including nationally and internationally designated sites and species, habitats and sites identified in Biodiversity and Geodiversity Action Plans;*
- *Heritage assets and their setting, and cultural assets; and*
- *Residential amenity e.g. noise, vibration, dust, lighting, and visual intrusion.*

Where any development proposals would potentially have adverse impacts on any of the assets listed above, the adequacy of any proposed mitigation measures will be assessed on a case-by-case basis.

The highest standards of design, operation and (where relevant) restoration and aftercare of sites must be practised.”

Development Management Policy DM8 – Design, local landscape and townscape character (taken from Norfolk County Council 2011, 81)

Development will be permitted if it will not harm the conservation of, or prevent the enhancement of, key characteristics of its surroundings with regard to the character of the landscape and townscape, including consideration of its historic character and settlement pattern, taking into account any appropriate mitigation measures.

Development will only be permitted where it would be within, or could affect the setting of, nationally or locally registered Historic Parks or Gardens, registered battlefields, conservation areas, listed buildings or the North Norfolk Heritage Coast, where the applicant can demonstrate that the development would not adversely impact on the historic form, character and/or setting of these locations, taking into account any mitigation measures.”

Development Management Policy DM9 – Archaeological sites
(taken from Norfolk County Council 2011, 82)

“Applicants whose proposals could potentially affect heritage assets, or which are in areas with high potential for archaeological interest, will be required to prepare and submit an appropriate desk-based assessment and, where necessary, a field evaluation with their application to the County Council.

Development will only be permitted where it would not adversely affect the significance of heritage assets (and their settings) of national and/or regional importance, whether scheduled or not. Where proposals for mineral extraction or waste management facilities would affect Scheduled Monuments and/or other assets of national and/or regional importance (including their settings), there will be a presumption in favour of their preservation in situ.

Following the results of a site evaluation, development which would potentially affect other heritage assets (not of national or regional importance) could be acceptable if subject to appropriate mitigation measures – such as physical preservation of the archaeology in situ, or preservation by record (including appropriate publication and archiving).”

Regional Research Agenda and Themes

12.1.23 The *Research and Archaeology: a Framework for the Eastern Counties, 1. Resource Assessment East Anglia* including Suffolk was originally published in 1997 and assessed the evidence for the region on a period by period basis. This was followed in 2000 by the *Research and Archaeology: A framework for the Eastern Counties, 2. Research Agenda and Strategy* which again examined the evidence on a period basis. Owing to the amount of fieldwork since 1997, a revised period-based framework was published in 2011 *Research and Archaeology revisited: a revised framework for the East of England* and this has been augmented by the recently updated East of England Regional Research Framework (researchframeworks.org/eoe/research-agenda/ 2021).

ASSESSMENT METHODOLOGY AND SIGNIFICANCE CRITERIA

12.1.24 Four criteria have been considered in evaluating the significance of the residual effects of the proposed development, taking into account any proposed mitigation measures.

Type of Impact

12.1.25 Impacts may be beneficial, adverse, neutral (i.e. no discernible effect) or none. They may be permanent or temporary, of long, medium or short duration, direct or indirect. They may also be cumulative or combined with other effects occurring in the vicinity.

12.1.26 Direct impacts have a physical effect upon an archaeological site, structure or cultural heritage asset. This may lead to the partial or total destruction of that asset.

12.1.27 Indirect impacts of development upon scheduled monuments, listed buildings, parks and gardens and other designated assets of the cultural heritage landscape are more difficult to assess. Consideration should include the context (or setting) of a cultural heritage asset (or place) and how we should assess its significance. Contextual relationships may be visual, but can also be, for example, functional, historical or intellectual.

Likelihood of the impact occurring

12.1.28 An assessment is made as to the likelihood of the identified impact occurring. Probability is considered as certain, likely, unlikely or uncertain.

Sensitivity

12.1.29 Five categories of sensitivity are identified. These are expanded upon in **Table 12.2**, below.

Table 12.2 Definitions of sensitivity

Very high	Sites and settings of <i>international importance</i> , for example World Heritage Sites.
High	Sites and settings of <i>national importance</i> . Scheduled Monuments. Registered Battlefields. Grade I and Grade II* Listed Buildings and Registered Historic Parks and Gardens. Sites may also be discovered as a result of new research that are also of national importance and are candidates for scheduling.
Medium	Sites and settings of <i>regional importance</i> . Archaeological sites and features that are not considered sufficiently important or well-preserved to be protected as Scheduled Monuments. Grade II Listed Buildings and Grade II Registered Historic Parks and Gardens. Conservation Areas.
Low	Archaeological sites and structures, and other components of the historic environment that contribute to the local landscape. Locally designated assets.
Negligible	Archaeological sites and structures, and other components of the historic environment of very low importance.

Magnitude

12.1.30 The magnitude of change to a cultural heritage asset or landscape is considered in terms of its vulnerability, its current condition and the nature of the impact upon it. With respect to sub-surface archaeology, there may be a degree of uncertainty of the magnitude of change, and where this is the case it is noted. Magnitude is assessed as major, moderate, minor or negligible/none and the criteria used in this assessment are set out in **Table 12.3**, below.

Table 12.3 Criteria for Assessing Magnitude of Change⁴

Magnitude of impact (change)		Typical description
Major	Adverse	Loss of resource and/or quality and integrity of resource; severe damage to key characteristics, features or elements.
	Beneficial	Large scale or major improvement of resource quality; extensive restoration; major improvement of attribute quality.
Moderate	Adverse	Loss of resource, but not adversely affecting the integrity; partial loss of/damage to key characteristics, features or elements.
	Beneficial	Benefit to, or addition of, key characteristics, features or elements; improvement of attribute quality.
Minor	Adverse	Some measurable change in attributes, quality or vulnerability; minor loss of, or alteration to, one (maybe more) key characteristics, features or elements.
	Beneficial	Minor benefit to, or addition of, one (maybe more) key characteristics, features or elements; some beneficial impact on attribute or a reduced risk of negative impact occurring.
Negligible	Adverse	Very minor loss or detrimental alteration to one or more characteristics, features or elements.
	Beneficial	Very minor benefit to or positive addition of one or more characteristics, features or elements.
No change		No loss or alteration of characteristics, features or elements; no observable impact in either direction.

⁴ Source: Design Manual for Roads and Bridges, 2020, LA104 *Environmental Assessment and Modelling*, page 14

Assessing significance

12.1.31 **Table 12.4** presents a matrix of the inter-relationship of environmental value (sensitivity) with magnitude that leads to a conclusion on the significance of an effect.

Table 12.4 Inter-relationship of sensitivity with magnitude⁵

	Magnitude of impact (degree of change)					
		No change	Negligible	Minor	Moderate	Major
Environmental value (sensitivity)	Very high	Neutral	Slight	Moderate or large	Large or very large	Very large
	High	Neutral	Slight	Slight or moderate	Moderate or large	Large or very large
	Medium	Neutral	Neutral or slight	Slight	Moderate	Moderate or large
	Low	Neutral	Neutral or slight	Neutral or slight	Slight	Slight or moderate
	Negligible	Neutral	Neutral	Neutral or slight	Neutral or slight	Slight

12.1.32 Finally, the suggested relevance of the significance of an effect in relation to decision making is presented in **Table 12.5**.

⁵ Source: Design Manual for Roads and Bridges, 2020, LA104 *Environmental Assessment and Modelling*, page 15

Table 12.5 Significance of effects in relation to decision making

Significance category	Typical description
Very large	Effects at this level are material in the decision-making process.
Large	Effects at this level are likely to be material in the decision-making process.
Moderate	Effects at this level can be considered to be material decision-making factors.
Slight	Effects at this level are not material in the decision-making process.
Neutral	No effects or those that are beneath levels of perception, within normal bounds of variation or within the margin of forecasting error.

12.2. Baseline

12.2.1 The Norfolk Historic Environment Record (NHER) was consulted for a record of sites, monuments and events. The event number for this assessment is ENF151930. The excellent service of Peter Watkins of Norfolk Community and Environmental Services is gratefully acknowledged.

12.2.2 The Historic England Archive (Listing the List) and Defra's Magic map was also consulted to verify the location of designated heritage assets.

DESIGNATED HERITAGE ASSETS

12.2.3 A study area of 2km from the boundary of the PDA was considered an appropriate distance to assess the potential effects upon the setting of designated heritage assets. After a site visit, the study area was reduced to 250m for Grade II assets given the screening effect of hedges, trees, development and topography.

Scheduled Monuments

12.2.4 There are no scheduled monuments within 2km. The nearest are the remains of St Olave's Priory (list entry 1003909), 2.8km north east. There is no intervisibility with the PDA.

Listed Buildings

12.2.5 There are two Grade I listed assets within 2km of the PDA and three Grade II. Locations are shown on **Figure 12.3** and their descriptions summarised in **Table 12.6**.

Table 12.6 Listed Buildings within study area

Asset	National Heritage List reference	Distance from PDA boundary	Description⁶
Church of St Mary, Haddiscoe Grade I	1169126	100m south	Parish church. C11 with C13 and C15 remodelling. Flint with limestone and red brick dressings. Lead roofs over nave, aisle and porch; chancel slated. West tower, nave, north aisle, south porch, chancel. Round west tower, probably late C11, divided into stages by three stone bands.
Church of St Matthias, Thorpe Grade I	1306674	450m north west	Parish church. C11 with later additions and fenestration, chancel rebuilt 1838. Flint with limestone dressings; red brick chancel. Thatched nave; slate roofs over chancel and south porch. West tower, nave, chancel, south porch. West tower late C11 with later upper stages.
White House Farmhouse Grade II	1373172	75m east	Farmhouse, early C18. Colourwashed brick and flint, front wall rendered. Black glazed pantile roof. Two storeys and attics, lobby entrance plan. Symmetrical facade of five bays; sashes with glazing bars and architraves. Central doorway.
Monument to William Salter, set in churchyard wall, 20m south of south door of St. Mary's Church Grade II	1373170	130m south	Wall monument, C18. Limestone with black incised lettering. Memorial to William Salter, the driver of the Yarmouth stage coach, died 1776.
War memorial Grade II	1453240	125m south	First World War memorial with Second World War addition in Haddiscoe Churchyard

⁶ Source: National Heritage List England (NHLE)

Asset	National Heritage List reference	Distance from PDA boundary	Description ⁶

Other Designated Cultural Heritage Sites

12.2.6 There are no World Heritage Sites, Conservation Areas, Registered Parks and Gardens or Battlefields within 2km of the PDA boundary.

ARCHAEOLOGICAL BACKGROUND

Desk-based assessment

12.2.7 A comprehensive desk-based assessment (DBA) was carried out in 2008 to identify and assess the archaeological potential of the PDA and accompany a previous planning application on a larger application site, including land to the south of Loddon Road and a slightly larger red line area for the Manor Farm land. The study area covered a 2.5km radius of the PDA. As part of the current application a new search was made of the NHER for a 1km radius of the PDA and cross-checked against the original research. The 2008 DBA⁷ is submitted with the planning application and the research contained within it is summarised and enhanced below.

12.2.8 The original assessment utilised information on known archaeological sites held in the NHER, combined with an examination of relevant cartographic, documentary and other sources, which provided the historical and archaeological context of the site. The other sources included published sources, previous archaeological reports and web-based material.

⁷ Watkins, P. 2008 *An archaeological desk-based assessment of land at Manor Farm, Haddiscoe, Norfolk*. NAU Report 1857.

- 12.2.9 The only additional data within the NHER since 2008 relates to the field-based evaluation work undertaken for the original planning application.
- 12.2.10 Maps are included at **Figures 12.4 and 12.5**.
- 12.2.11 The DBA identified cropmarks of prehistoric, Roman, medieval and post-medieval period within the PDA (24146⁸, 49678, 52651) and these were assessed further by field evaluation (see below).
- 12.2.12 The prehistoric period is well represented in the area, and the cropmark of a ring ditch (49678) lies within the PDA, as well as many more within the 2.5km radius. A possible Neolithic long barrow or mortuary enclosure (44860) is also recorded in the wider landscape. It was concluded that a later Neolithic/earlier Bronze Age barrow group once lay on the high ground at the edge of the marshes (12164).
- 12.2.13 The Roman period is similarly well represented in Haddiscoe, with the cropmarks of enclosures, boundaries, and another possible ring-ditch within the extraction area (24146). A silver coin hoard (28212) was also found here on the north-eastern edge of the PDA, along with several artefacts. The wider area also showed signs of prolific Roman occupation. The conclusion drawn was that there was a possibility of Roman remains being present on the site.
- 12.2.14 The Saxon period provided little evidence in Haddiscoe, although it is likely that the village itself was well formed by the late Saxon period. The village was mentioned in the Domesday Book. The parish church incorporates a 11th century round tower. Any late Saxon activity may have clustered around the church and make it a possibility that remains may be found of this date.

⁸ NHER reference

- 12.2.15 The medieval period may have brought the Knights Templar to Haddiscoe, with references to a preceptory here. A 'massive wall' found near Crab Apple Lane may have been associated with this, although the conclusion was drawn that the preceptory lies under Manor Farm, which is a post-medieval building, but with medieval origins. The likelihood of the preceptory extending into the extraction area was seen as a distinct possibility.
- 12.2.16 Since the post-medieval period the PDA is considered to have been under agricultural use, with some changing of boundaries and road alignments to the periphery.

Geophysical Survey

- 12.2.17 A geophysical survey was undertaken by North Pennines Archaeology between July and October 2008. The report⁹ is submitted with the planning application. The survey used geomagnetic/magnetometer survey, conducted using hand-held gradiometers. The PDA was divided into three areas, with Area 1 to the south of the Loddon Road now excluded from the PDA. That Area was rich in archaeology with probable Roman field systems and enclosures.
- 12.2.18 Area 2 was located in the north of the PDA and measured 9.5ha. Trees bounding the site to the north, south and west prevented survey in those areas. A modern fence on the eastern side gave a strong dipolar response in the survey. Area 3 was located to the south of Area 2, and measured 7.5ha.
- 12.2.19 No clear archaeological features were identified in either Area and Area 3, in particular, was dominated by a large spread of dipolar magnetic responses, probably due to fired/ferrous material in the soil.
- 12.2.20 Interpretative plots are shown on **Figures 12.6 and 12.7**.

⁹ Railton, M. 2008. *Geophysical Surveys of Land at Manor Farm, Haddiscoe, Norfolk*. NPA report no. CP741

Fieldwalking

- 12.2.21 A fieldwalking and metal detecting survey was carried out by NAU Archaeology from September to November 2008. This involved systematic walking of transects 20m apart, and any finds recovered were plotted with a hand-held Global Positioning System (GPS) unit.
- 12.2.22 The results revealed finds of worked flint, recovered from across the PDA, and burnt flints were noted in the south-west corner of the PDA. Occasional Roman pottery was identified, with a concentration in the south-western corner. Medieval and post-medieval artefacts were found evenly spread (probably reflective of manuring). No Saxon finds were made.
- 12.2.23 The distribution of artefacts is shown on **Figure 12.8**.
- 12.2.24 The report¹⁰ is submitted with the planning application.

Trenching Evaluation

- 12.2.25 An evaluation by trial trenching was carried out by NAU Archaeology in November and December 2008. A total of 79 trenches were dug, with 60 in the PDA (NHER24146) and 19 in the excluded area (NHER 51517). The report¹¹ is submitted with the planning application.
- 12.2.26 The evaluation covered approximately 2% of the PDA and it was intended to investigate the possible archaeological features and areas of archaeological potential identified during the earlier phases of work. The following summary is taken from the evaluation report. **Figures 12.9 and 12.11** illustrate the results.

¹⁰ Barnett, A. 2009 *An Archaeological Fieldwalking Survey at Manor Farm, Haddiscoe*. NAU report no.1935b

¹¹ Morgan, S and Hodges, L.. 2009 *An Archaeological Evaluation at Manor Farm, Haddiscoe*. NAU report no. 2026

- 12.2.27 The northern part of the PDA contained undated features, some of which appear to be field boundaries shown on the 1809 Enclosure map. The trenches in the south eastern part contained, for the most part, linear field boundaries, some of which could also be seen on the aerial photographic survey by the National Mapping Programme. It was found that some of these features dated from the Roman and early medieval periods. Of the two dateable pits in this area, one was found to be Iron Age and the other medieval.
- 12.2.28 The south-western part of the PDA consisted of linear field boundaries and possible settlement enclosures, some of which can be seen on the aerial photographic survey by the National Mapping Programme and also the Enclosure map of 1809. The features were likely to be Roman and formed the northern edge of the dense archaeological site to the south of the Loddon Road, now excluded.
- 12.2.29 The main factor in determining the location of the archaeological features found in the evaluation appears to be the nature of the soils. It would seem that those archaeological features which also appear on the aerial photographic and geophysical surveys, occur in areas of sand and gravel soils rather than on clay soils. The central part of the PDA has the most clayey soil and it is here that very few archaeological features appear to exist reflecting a less attractive geology for settlement in comparison to better drained sands and gravels. However, it may also be the case that there is a lower rate of survival of archaeological features on areas of clayey soil, as the topsoil and subsoil were also thinner here than on the sand and gravel.
- 12.2.30 In general, it would seem that the features shown on the Enclosure map of 1809 and on the aerial photographic survey by the National Mapping Programme appear to have been uncovered in greater quantities in this evaluation than those shown on the geophysical survey. Also, features were found during this project which did not appear on any of the previous surveys. Interestingly, these features were not necessarily found to be any shallower than those features that were recorded in the surveys. Also, the fills of these

features were not markedly different material from those that were recorded in the surveys.

12.2.31 The results appear to suggest that the interfluvium on which Haddiscoe is situated was a focus of agricultural and settlement activity from the Roman period onwards. The Roman focus lay predominantly to the south of the Loddon Road and to the west of the Church of St Mary, with its northern boundary creeping into the south western corner of the PDA.

Historic Landscape

12.2.32 The Historic Landscape Characterisation (HLC) for the PDA is covered by two references (**Figure 12.12**):

- HNF38007 (the northern half of the PDA), described as 20th century agriculture (boundary loss) in a landscape of 18th-19th century enclosure (Piecemeal style Parliamentary enclosure); and
- HNF38008 (the southern half of the PDA), described as 18th-19th century enclosure (Piecemeal style Parliamentary enclosure).

12.2.33 During the Roman period much of the land to the east of Haddiscoe was flooded as part of a large estuarine landscape at the mouth of the Bure, Yare and Waveney rivers. This landscape led to the settlement pattern seen today where towns and villages are located at the break of slope between the low-lying marshes and the slightly elevated higher ground.

12.2.34 Archaeological records present little evidence for Saxon activity and settlement, but this may reflect a lack of investigation and fragility of the archaeological record. Pre-Norman foundations of the churches in the area would certainly suggest that settlements were largely established by the late Saxon period. Haddiscoe and its surrounding villages were all included in the Domesday Book; Haddiscoe being a *berewick* - an outlying estate - of Stigand, Archbishop of Canterbury.

12.2.35 It is highly likely that from the medieval period onwards the PDA has been in continuous agricultural use. The earliest maps of the broader area show an

agricultural landscape dominated on the higher plateau land by arable with smaller enclosures of pasture and extensive grazing marshes on the low-lying land. Faden's Map of Norfolk of 1797 is the first to show the PDA in any detail (**Figure 12.13**). Land use and settlement pattern is similar to today but field boundaries, roads and tracks have changed. Crab Tree Lane is not shown, and two tracks cross the PDA. These may correspond to cropmarks and ditches seen in the evaluation. The straightness of Crab Apple Lane and the straight field boundaries within the PDA point to a reorganisation of the landscape here at, or soon after enclosure in 1809. The tithe map of 1840 (**Figure 12.14**) shows the reorganisation in place, with the parish boundary between Haddiscoe and Thorpe crossing the centre of the PDA in a broadly east – west direction, and again apparently straightened.

12.2.36 The Ordnance Survey of 1894 shows little additional change in the 19th century, **Figure 12.15**.

AERIAL PHOTOGRAPHY and LiDAR

12.2.37 The NHER includes a plot of cropmarks recorded by the National Mapping Programme. An extract (**Figure 12.16**) is shown below, focussed on the PDA. Some of these were tested as part of the trenching evaluation .

12.2.38 The PDA is completely featureless on LiDAR, as might be expected of intensively ploughed fields (**Figure 12.17**).

12.3. Direct Impacts and Mitigation

DIRECT IMPACTS

- 12.3.1 The nature of mineral extraction results in the total loss of the archaeological resource wherever extraction takes place, and the potential loss or damage in other areas associated with infrastructure and landscaping.
- 12.3.2 The PDA lies within an area of moderate multi-period archaeological potential, as has been confirmed by desk-based study and field-based evaluation.
- 12.3.3 The trenching in particular identified a couple of foci, but largely the PDA was devoid of archaeology and the features found were truncated by ploughing.

MITIGATION OF DIRECT IMPACTS ON ARCHAEOLOGY

Overview

- 12.3.4 In accordance with planning policy, loss of archaeology needs to be offset by a programme of mitigation. There is no evidence of any archaeology requiring preservation *in situ*. NPPF recognises that an acceptable alternative is preservation by record through archaeological excavation, recording, analysis and publication appropriate to significance of the archaeological resource. All features encountered should be investigated and recorded in accordance with standards published by the Chartered Institute for Archaeologists and Historic England.
- 12.3.5 Based upon the results of the trial-trenching one focus has been excluded from the extraction area. Whilst not of national importance, and therefore its preservation is not a requirement, its location on the periphery of the PDA has allowed it to be avoided and will be protected under a temporary topsoil bund.
- 12.3.6 The other focus in the eastern part of the PDA would be subject to open-area excavation in advance of extraction.
- 12.3.7 These areas are shown on **Figure 12.18**.
- 12.3.8 A Strip Map and Sample (SMS) or watching brief is not proposed for the remainder of the PDA.

12.3.9 Details of methodologies will be formalised in a Written Scheme of Investigation (WSI), agreed with Norfolk County Council, prior to development commencing. A draft of the WSI is submitted in Appendix 12.6 for Norfolk County Council to review.

Open area excavation

12.3.10 In summary, the main objectives of the excavation would be:

- to establish the presence/absence, nature, extent and state of preservation of archaeological remains and to excavate and record these in detail where they are observed;
- to understand more fully the nature of archaeological remains within this area and in particular identify potential for settlement or activity associated with the early history of Haddiscoe, including Saxon and Knights Templar remains;
- to recover artefactual material, especially that useful for dating purposes;
- To be science-led, so that should deposits be exposed that contain palaeoenvironmental or datable elements, appropriate sampling and post-excavation analysis strategies will be initiated. The project will be organised so that specialist consultants who might be required to conserve or report on finds, or advise or report on other aspects of the investigation (e.g. palaeoenvironmental analysis), can be called upon and undertake assessment and analysis of such deposits. On-site sampling and post-excavation assessment and analysis will be undertaken in accordance with Historic England's guidance in *Environmental Archaeology: a guide to the theory and practice of methods, from sampling and recovery to post-excavation -2nd edition 2011*.

ASSESSMENT OF SIGNIFICANCE

12.3.11 The residual effects upon archaeology are assessed as slight adverse. This is offset by contribution to knowledge and the potential to reveal important information relating to the establishment and development of Haddiscoe in the Saxon and medieval era.

12.4. Assessment of the Setting of Listed Buildings

INTRODUCTION

12.4.1 National Planning Policy Framework Paragraph 194 requires applicants to describe the significance of any heritage assets likely to be affected by development proposals. The paragraph states that the level of detail should be proportionate to an asset's importance and no more than is sufficient to understand the potential impact of the proposal.

12.4.2 Significance (for heritage policy) is described at Annex 2 of the National Planning Policy Framework as:

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

Setting is defined within the NPPF as:

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

12.4.3 The key policy guidance is *Historic England: The Setting of Heritage Assets (GPA3 - 2017)*.

12.4.4 This recommends the following broad approach to assessment, undertaken as a series of steps that apply proportionately to complex or more straightforward cases:

- Step 1: identify which heritage assets and their settings are affected;
- Step 2: assess whether, how and to what degree these settings make a contribution to the significance of the heritage asset(s);

- Step 3: assess the effects of the proposed development, whether beneficial or harmful, on that significance;
- Step 4: explore the way to maximise enhancement and avoid or minimise harm;
- Step 5: make and document the decision and monitor outcomes.

12.4.5 The assessment followed that methodology.

STEP 1: IDENTIFY WHICH HERITAGE ASSETS AND THEIR SETTINGS ARE AFFECTED

12.4.6 A site visit was carried out in April 2022 before the majority of trees had come into leaf. Based upon that visit it was concluded that the setting of three listed buildings were potentially sensitive due to proximity and views. Their setting was assessed without entering onto private land. Google Earth was also used as a tool to understand setting and context within the wider landscape. Buildings scoped out of assessment are discussed in **Table 12.7**.

Table 12.7 Listed Buildings Scoped Out Of Assessment

Asset	National Heritage List reference	Scoped out (with justification)
Monument to William Salter	1373170	To south of church, with no intervisibility with PDA
War memorial	1453240	To south-east of church, with no intervisibility with PDA

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

The Church of St Mary, Haddiscoe

- 12.4.7 The Church of St Mary, Haddiscoe (**Figure 12.19**) is one of a number of distinctive round tower churches in the area. These are a group of historical significance, dating from the late Saxon/early Norman era. The location of the Church tends to enhance its prominence and grandeur. It is actually of quite modest size, but, particularly when approached from the south it can be viewed sitting on a topographical eminence on the northern bank of the Landspring Beck valley. This view has attracted artists, including John Alfred Arnesby Brown (1866–1955) (**Figure 12.20**).
- 12.4.8 A second view, of less prominence but nevertheless of importance, is from the west and along the Loddon Road when driving or walking towards Haddiscoe. The road gradually rises up towards the Church in a landscape of gently rolling agricultural land (**Figure 12.21**).
- 12.4.9 Both these views enhance the significance of the Church in its landscape and since its construction these views have changed little, except for the introduction of some field boundaries. Neither view will be affected by the proposed development and the development will not be visible in the same visual ‘envelope’.
- 12.4.10 To the north of the Church (towards the PDA) the landscape has the character of open countryside in agricultural use, one that has changed both since the Church’s construction (by enclosure) and again in the 20th century through field boundary loss. The Church sits in the fork of two roads, including the busy A143 (50m to the south east) and the B1136 (Loddon Road), 90m to the north. This affects tranquillity and vehicular movement is intrusive.
- 12.4.11 Between the Church’s ancient boundary wall and the Loddon Road is an 80m buffer of recent cemetery and future land and views of the PDA from the Church at ground level are entirely blocked by tree planting along the Loddon Road. This is a wide and substantial screen, with a depth of about 20m, which means that even in winter there would be no views of mineral extraction.
- 12.4.12 This can be seen on **Figures 12.22-12.24**. The locations of Figures 12.20-12.23, and the current context of the Church is shown on **Figure 12.25**.

- 12.4.13 There would be views northwards over the PDA from the Church tower, but this is not a view enjoyed by the public. In future, and after restoration, this view whilst slightly altered due to lowering of the land surface, would not be perceptible as a post-industrial landscape and would be restored to agriculture.
- 12.4.14 The view to St Matthias Church, Thorpe, whilst not a designed view, does hold historical significance given the near contemporary date of the two churches. This will be unaffected by the proposed development.

The Church of St Matthias, Thorpe

12.4.15 The position of the Church is on rising ground above the flood plain of the River Waveney and was no doubt chosen to give it prominence in the landscape. The tower is visible from distance across extensive areas of flat land to the north and east, but less so to the south and west where the view is more enclosed due to woodland around the Church. This creates a sense of enclosure and tranquillity which is today somewhat lacking at St Mary's (**Figures 12.26 and 12.27**). There is no inter-visibility with the PDA due to vegetation and intervening development and views south to St Mary's would be unaffected, **Figure 12.28**.

White House Farmhouse

12.4.16 Despite proximity to the PDA, at 75m to the boundary, there is no intervisibility between the asset and the PDA. White House Farmhouse is enclosed within a hedged and fenced curtilage, set below the level of Thorpe Road (**Figure 12.29**) There are no views of the PDA at ground level due to topography, development and woodland bordering the PDA, **Figure 12.30**.

12.4.17 Even in winter, any views from first floor windows would most probably be highly filtered through the dense branches of planting along Thorpe Road and development, including recently converted barns immediately to the west of White House (**Figure 12.31**). Potential effects from noise and dust are considered in other reports.

STEP 3: ASSESS THE EFFECTS OF THE PROPOSED DEVELOPMENT, WHETHER BENEFICIAL OR HARMFUL, ON THE SIGNIFICANCE OR ON THE ABILITY TO APPRECIATE IT

12.4.18 The key factor is to determine the effects upon significance and how that can affect our ability to appreciate the assets, the test set in Historic England guidance. Effects may be visual or contextual (such as historical), and the current setting is important.

12.4.19 From the above assessment, we have reached the conclusions set out in **Table 12.8**. This is before any mitigation is designed in, which is addressed in Step 4, below.

Table 12.8 Assessment of setting in relation to PDA and magnitude of change in significance

Asset	Current setting	Change and Magnitude
Church of St Mary	Separated from PDA by 20m deep tree belt, Loddon Road and 80m of modern cemetery land. Intrusion from traffic (movement and noise). No views of PDA at ground level.	No change at ground level. Views from church tower over PDA, but not accessible to public. No change in views towards the Church from key directions (south and west) Negligible adverse effect of slight magnitude due to change in view from Church tower during operations and after restoration. No change in view towards Church of St Matthias.
Church of St Matthias	Contained within a wooded environment. No views of PDA from ground level or tower.	No change. Key views to and from church unaffected.
White House Farmhouse	Set below the level of Thorpe Road. No views of the PDA at ground level due to topography, vegetation and development.	No change to views. Potential effects of noise and dust considered in other reports.

STEP 4: EXPLORE WAYS TO MAXIMISE ENHANCEMENT AND AVOID OR MINIMISE HARM

12.4.20 No specific mitigation measures are considered necessary.

STEP 5: MAKE AND DOCUMENT THE DECISION AND MONITOR OUTCOMES

12.4.21 The residual effects of the proposed development are documented below,
Table 12.9.

Table 12.9 Evaluation of residual effects upon designated heritage assets (source DRMB *op cit*)

Direct / Indirect	Asset	Sensitivity	Magnitude of change	Significance of Effect	Relevance to Decision making
Direct effects	Statutorily Protected Heritage Assets	High	No change	Neutral	No change
Indirect effects upon setting of designated assets and significance	Church of St Mary	High	Negligible	Slight	Not a material factor in the decision-making process if mitigation is adopted at detailed design stage
	Church of St Matthias	High	No change	Neutral	No change
	White House Farm	Medium	No change	Neutral	No change
	Other designated heritage assets (scheduled monuments, Grade II* assets)	High	No change	Neutral	No change

October 2022

12.5 Summary

SCOPE OF WORK

- 12.5.1 This report, commissioned by Breedon Trading Ltd, presents the findings of a cultural heritage desk-based assessment and field-based evaluation for proposed gravel extraction at Manor Farm, Haddiscoe. It considers both direct and indirect effects upon cultural heritage. Direct effects are those that physically affect a cultural heritage asset. Indirect effects can occur as a result of changes to the setting of a cultural heritage landscape or asset, whether permanent or temporary. This is particularly relevant to designated features of national importance, such as World Heritage Sites, Scheduled Monuments, Listed Buildings, Conservation Areas and Registered Parks and Gardens.
- 12.5.2 In order to assess the effects of the proposed scheme, cultural heritage information within and up to 2km from the boundary of the PDA was examined.
- 12.5.3 A variety of sources were consulted including the Norfolk Historic Environment Record, the Historic England Archive, DEFRA, aerial photography, readily available local history materials and archaeological assessments carried out in connection with a previous planning application.

DIRECT EFFECTS UPON ARCHAEOLOGY AND MITIGATION

- 12.5.4 The PDA lies within an area of moderate multi-period archaeological potential, as has been confirmed by desk-based study and field-based evaluation within the PDA.
- 12.5.5 In accordance with planning policy, loss of archaeology needs to be offset by a programme of mitigation. There is no evidence of any archaeology requiring preservation *in situ* but a small focus of Roman activity marking the northern edge of a possible settlement (in the south west corner of the PDA) will be protected under by a stand-off excavation area and fencing.
- 12.5.6 A second focus, covering an area of about 2ha in the eastern part of the PDA, may contain evidence related to the historic development of Haddiscoe and

will be subject to open-area excavation. This is recognised by NPPF as an acceptable alternative and would be accompanied by recording, analysis and publication appropriate to significance of the archaeological resource.

- 12.5.7 Details of methodologies will be formalised in a Written Scheme of Investigation (WSI), agreed with Norfolk County Council. A draft of the WSI is presented in Appendix 12.6 for NCC to review.

INDIRECT EFFECTS AND MITIGATION

- 12.5.8 The potential indirect impacts of the proposed development on designated heritage assets have been assessed.
- 12.5.9 There is no intervisibility with the PDA at ground level from any designated asset due to topography, intervening vegetation and distance.
- 12.5.10 Only one view of the PDA has been identified, from the church tower of St Mary, Haddiscoe. The change in this view is assessed under criteria set out in Historic England guidance as being negligible adverse and of slight significance. There would be no discernible effect upon its setting during operations or after restoration.
- 12.5.11 The effect upon all other designated assets is considered neutral (i.e. no change to the existing situation).
- 12.5.12 There would be no effect upon our ability to appreciate the significance of any of the assets, the test set by Historic England.
- 12.5.13 No specific mitigation is required.

CONCLUSION

- 12.5.14 Having regard to the baseline conditions, the nature of the proposed development and the proposed measures that would be effective in mitigating the impacts of the scheme, the residual effects upon archaeology are assessed as slight adverse. This is offset by the potential to contribute to our knowledge of archaeology,
- 12.5.15 There would be one effect of slight significance upon the view from the tower of The Church of St Mary, Haddiscoe. There is no effect upon other designated heritage assets.

12.5.16 With mitigation in place, secured via a planning condition, archaeology and heritage should therefore not be a factor in the decision-making process, as set out in Table 5, Section 1.6 above.

12.5.17 The proposed development therefore accords with both local and national cultural heritage policy.