



Project: A47-A11 Thickthorn Junction

Planning Act 2008

Deadline 1 (13th October 2021): Written Representation

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Our Ref: PL00332122

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The Historic Buildings and Monuments Commission for England (HBMCE) is better known as Historic England, and we are the Government's adviser on all aspects of the historic environment in England - including historic buildings and areas, archaeology and historic landscape. We have a duty to promote conservation, public understanding and enjoyment of the historic environment. We are an executive Non-Departmental public body and we answer to Parliament through the Secretary of State for Digital Culture, Media and Sport.

Historic England do not intend to attend the issue specific or open floor hearings in person.

Written Representation:

1. Introduction

The applicant has provided a full Environmental Statement (ES) with a Cultural Heritage chapter (Chapter 6) which includes the results of geophysical surveys and archaeological trial trenching. Historic England has been engaged in pre-application discussions with the applicant's heritage consultants at and before the Scoping Opinion Stage of the proposals and the previous advice given is summarised in Section 6.3 of Appendix 6.1 of the ES.

Historic England is in agreement with the baseline data considered in the Cultural Heritage Chapter of the ES and the list of designated and non-designated heritage assets set out in Appendix 6.1 (Cultural Heritage information). We are also in agreement with the methodology used to assess the cultural heritage datasets within Chapter 6.

2. Designated Heritage Assets

The Cultural Heritage assessment establishes that there are no scheduled monuments, grade I or grade II* listed buildings, registered parks and gardens, registered battlefields or conservation areas within the DCO boundary itself.





Two scheduled monuments, a conservation area and a grade II* registered park and garden have been identified in the wider study area along with a number of grade II listed structures. Advice on grade II buildings will be provided by South Norfolk District Council's Conservation Team and are not considered further within this written representation.

The conservation area (Cringleford) and grade II* registered park and garden (Intwood Hall List Entry Number 1000320) are identified within the Cultural Heritage Assessment as lying outside of the Zone of Theoretical Visibility (ZTV). One of the scheduled monuments, 'Two round barrows near Norwich Lodge, Ketteringham Hall' (List Entry Number 1002888) is also located outside of the ZTV. We agree with the findings of the ES that there would be no impact on these three designated heritage assets.

Historic England's advice on designated heritage assets will therefore be limited to the scheduled monument of 'Two tumuli in Big Wood' (List Entry Number 1003977). The monument comprises the earthwork mounds of two round barrows of probable Bronze Age date and any associated buried archaeological remains. It lies within a 'cut-out' within the overall DCO boundary area and consequently is surrounded on all sides by the proposed development area. Of the two separate areas which make up the scheduled monument, the westernmost barrow lies closest to the DCO boundary at a distance of c.10m. The potential for both physical and setting impacts to this designated heritage asset were raised as a concern by Historic England during initial pre-application discussions.

The aerial photograph and Lidar assessment (Section 6.5.20-24 of Appendix 6.1) has provided detailed information about the extent of the earthwork remains of the scheduled barrows and of the former quarrying around them. It is apparent that the former quarrying extended close to the barrow mounds and will have removed much of their immediate archaeological context. However, potential remains for associated buried archaeological deposits to be present both close to and within the wider area surrounding the monument.

As the 'Two tumuli in Big Wood' scheduled monument is located outside of the DCO boundary there would be no direct, physical impact on the barrow earthworks or on any buried archaeological remains within the scheduled area.

The close proximity of the DCO boundary to the scheduled monument means that there is potential for indirect impacts on the monument's setting through visual changes, and through changes in noise or light levels.





The two barrows are located at the top of a south-facing slope overlooking the small valley of a tributary of the River Yare. Despite previous changes to the landscape context of the two barrows, most notably the construction of the existing A11, which lies in a cutting immediately to the west, the topographic relationship between the barrows and the valley still exists. Although the landscape surrounding the scheduled monument is currently wooded and there is no inter-visibility between the barrows and the watercourse at present potential currently exists for this to be the case if the trees were to be removed in the future.

The proposed construction of the Cantley Lane Link Road on an embankment immediately to the south of the two barrows and the diversion of the watercourse would result in a substantial change to the landscape context of the two barrows. The relationship between the barrows, valley and watercourse would be permanently and adversely altered resulting in harm to the significance of the scheduled monument.

Section 6.10 of the Cultural Heritage Chapter of the ES assesses the likely significant effects of the proposed scheme on the 'Two tumuli in Big Wood' scheduled monument.

The ES identifies that there would be a major temporary construction phase impact on the scheduled monument, giving a 'large adverse significance of effect' (Section 6.10.3). This would arise from construction activities taking place in close proximity to the scheduled monument and would be limited to the construction phase. Section 6.10.6 of the ES considers that there would be no permanent construction phase residual effects, with all impacts effectively mitigatable through archaeological recording.

Section 6.10.7 of the ES considers the operational phase residual effects of the proposed scheme. It identifies that the change to the setting of the 'Two tumuli in Big Wood' scheduled monument, primarily through the permanent alteration of its landscape context, would be a moderate impact 'giving a moderate adverse significance of effect'.

Potential impacts from noise and light levels are included in the assessment in Section 6.10.7. However, it is noted in Section 6.10.16 that there would potentially be a minor to moderate reduction in noise levels at the scheduled monument. Section 6.10.17 indicates that night-time lighting will remain at the current levels with no additional adverse impact on the scheduled monument.





Table 6-10 of the ES sets out the operation phase residual effects and recommended mitigation measures. With regards to the visual impact of the proposed scheme on the 'Two tumuli in Big Wood' scheduled monument, the proposed mitigation comprises focussed planting and screening of the new infrastructure. However, we note that Sheet 2 of the Environmental Masterplan (Section 6.8 of the ES) shows tree planting only on the southwest embankment of the Cantley Lane Link Road adjacent to the westernmost scheduled barrow. The north-eastern embankment is shown on the plan as 'species rich grassland'. Whilst it may be appropriate to retain some view of the westernmost barrow from the link road to provide visual context for the proposed information board (see below) careful consideration needs to be given to balancing the levels of screening and visibility.

We note the proposal to include an information board to identify the barrows and explain their landscape context (Chapter 6, Section 6.9.9). As noted in Section 6.9.10, the provision of an information board relating to the scheduled monument has potential to deliver some public benefit along with the additional knowledge gained from the archaeological investigations carried out for the scheme (Table 6-10).

3. Non-Designated Heritage Assets

The Cultural Heritage Chapter of the ES (Chapter 6) identifies a wide range of non-designated heritage assets within the DCO application boundary and wider study area.

The archaeological surveys already undertaken have identified previously unrecorded buried archaeological remains and a high potential for further such non-designated heritage assets to be present within the application site boundary.

We note that not all parts of the application site were available for investigation prior to submission of the ES. Further field survey (including trial trenching and test-pitting) was proposed for Spring 2021. Geo-archaeological monitoring of the geotechnical investigation works within the watercourse valley to the south of the 'Two tumuli in Big Wood' scheduled monument was also proposed. Historic England has not yet seen the results of these further phases of archaeological investigations.

Advice regarding the impact of the proposed scheme on non-designated archaeological heritage assets is being provided by Norfolk County Council Environment Service. However, Historic England retain an interest in the non-designated archaeological heritage assets within the scheme area in our capacity as a provider of specialist archaeological science advice to the Norfolk County Council Archaeological Advisors and





to the Applicant and their Archaeological Consultants/Contractors. Consequently, we consider that we should be consulted on the draft Archaeological Written Scheme of Investigation.

4. Conclusion

Historic England is satisfied with the baseline information considered in the Cultural Heritage Chapter of the ES and with the assessment methodology employed. We are also broadly in agreement with the conclusion drawn in the ES with regard to the potential impacts on designated heritage assets.

Historic England considers that the proposed scheme would have an adverse impact on the 'Two tumuli in Big Wood' scheduled monument through permanent change to its landscape setting. We consider that this change would result in harm to the significance of this designated heritage asset. Historic England considers that, with the proposed mitigation measures in place, the harm to the significance of the 'Two tumuli in Big Wood' scheduled monument would be at a moderate level of 'less than substantial harm' in terms of the National Policy Statement for National Networks.

Paragraph 5.134 of the National Policy Statement for National Networks requires that where a proposal will lead to less than substantial harm to the significance of a designated heritage asset, the harm should be weighed against the public benefit of the proposal.

Section 7.2 of the ES (National Policy Statement for National Networks Accordance Table) considers how the impact on the 'Two tumuli in Big Wood' scheduled monument can be weighed against the longer term and wider economic, transport, environmental and community benefits of the Scheme as set out in Section 7.1 (the case for the Scheme). It concludes that the public benefits of the proposed scheme are considered to 'outweigh any effects on sensitive designated heritage asset receptors'.

Historic England considers it likely that, with appropriate mitigation measures in place, including the proposed heritage interpretation and archaeological knowledge gain, the wider public benefits of the proposed scheme can be weighed favourably against the moderate level of less than substantial harm to the significance of the 'Two tumuli in Big Wood' scheduled monument which would arise from the proposed scheme.





Historic England

In the event that the development is consented, we would be concerned to ensure that the historic environment is adequately and appropriately considered, and that the DCO is appropriately worded to ensure appropriate mitigation would be delivered.

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