

From: [Eve, David](#)
To: [A47 NorthTuddenham to Easton](#)
Subject: Historic England Rule 8 Written Representations and Examining Authority's 1st Questions
Date: 26 August 2021 18:10:32
Attachments: [A47 Easton Tuddenahm Os 8.21.pdf](#)
[A47 Tuddenham Easton reps 21 V.2.pdf](#)

Please find attached copies of the above documents being sent in advice on the D1 deadline of 1st September as I am due to go on leave. Please do let me know if you need any additional advice.

You might also like to know that we have agreed a SOCG with the applicant and have returned this to them today.

I would appreciate it if you could acknowledge receipt of these attachments for our records.

Best wishes

David

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**PLANNING ACT 2008 (AS AMENDED) – SECTION 89 AND THE
INFRASTRUCTURE PLANNING (EXAMINATION PROCEDURE) RULES 2010 (AS
AMENDED) - RULE 8**

**APPLICATION BY HIGHWAYS ENGLAND FOR AN ORDER GRANTING
DEVELOPMENT CONSENT FOR THE A47 NORTH TUDDENHAM TO EASTON,
NORFOLK**

APPLICATION REF: TR010038

**REPRESENTATIONS OF THE HISTORIC BUILDINGS AND MONUMENTS
COMMISSION FOR ENGLAND (HISTORIC ENGLAND)**

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1. Summary

- 1.1 The project would comprise the construction, operation and maintenance of an altered section of the A47 in Norfolk including 9km of new carriageway, two new junctions, removal of an existing roundabout, construction of four bridges, a new side road to Sandy Lane, widening an existing junction and associated work to existing roads and public rights of way, road closures, utilities works and temporary construction facilities.
- 1.2 The development has the potential to affect archaeological deposits of interest, both directly and indirectly. A mitigation strategy has been presented by the applicant, which includes a programme of archaeological works that will inform preservation strategies, either preserving remains in situ or by record. We will not comment on this strategy and associated documents in detail and are content for Norfolk County Council's Historic Environment Service to comment.
- 1.3 In the applicant's assessment of the designated heritage assets within a Zone of Theoretical Visibility around the development which could be affected by the proposed development four grade I listed buildings, three grade II* listed buildings and 19 grade II listed buildings were identified along with 244 undesignated heritage assets. Due to the scale of the development, there is potential for visual impact on these designated assets which could harm their historic significance. The significance of these assets and the impact on them has been assessed by the applicants. We would defer advice on grade II listed buildings and non-designated heritage assets including archaeology to the





County Council and local planning authorities but have commented on the assessment of the grade I and II* listed buildings.

- 1.4 We consider the significance of these designated assets and the impact on them has been appropriately assessed. We accept the applicants' assessment that no significant harm would result from the development as regards the grade I and II* listed buildings, with the exception of the grade II* listed St Andrew's parish church at Honingham and the grade I listed parish church of St Peter at Easton. We agree with the applicant that there would be a degree of harm to the historic significance of both these churches due to changes in their settings. We agree that this would be less than substantial harm in terms of the National Policy Statement for National Networks and National Planning Policy Framework

2. Introduction

- 2.1 The Historic Buildings and Monuments Commission for England (HBMCE), known as Historic England, are the Government's adviser on all aspects of the historic environment in England - including historic buildings and areas, archaeology and historic landscape – and have a duty to promote public understanding and enjoyment. HBMCE are an executive Non-Departmental Public body sponsored by the Department for Digital Culture, Media and Sport (DCMS) and we answer to Parliament through the Secretary of State for Digital Culture, Media and Sport. Our remit in conservation matters intersects with the policy responsibilities of a number of other government departments – particularly the Ministry of Housing, Communities and Local Government, with their responsibilities for land use planning matters. The National Heritage Act (2002) gave HBMCE responsibility for maritime archaeology in the English area of the UK Territorial Sea.
- 2.2 The Cultural Heritage chapter of the Environmental Statement (ES) identifies four grade I listed buildings, three grade II* listed buildings and 19 grade II listed buildings along with 244 undesignated heritage assets as being within the study area around the development. The construction also has potential to impact on undesignated archaeological deposits. Our interest chiefly focusses on the seven highly designated assets that could be affected by the proposed development. We would defer advice on grade II listed buildings and non-designated heritage assets including archaeology to the County Council and local planning authorities but would comment on the assessment of the grade I and II* listed buildings.

Historic Buildings and Areas

- 2.3 The proposed development follows the route of the existing A47 from the point where it ceases being a dual carriageway to the west of Norwich at Easton to a point south of North Tuddenham. The existing A47 by-passes the historic settlements of Easton, Honingham, Hockering and North Tuddenham. The grade I listed parish church of St Peter at Easton is set to the south of the existing road and due to the road having been constructed on levelled ground built into a slope below the church the historic building is higher than the



roadway. St Andrew's church is at some distance from the village of Honingham and separated from it by the existing A47 but the churchyard stands immediately beside the road. It is listed at grade II*. The grade I listed church of St Michael, Hockering stands to the north of the existing A47 but is set further away from the carriageway than the other churches. We will comment on the impact on the setting of these heritage assets in detail.

- 2.4 At greater distance from the proposed development are the grade I listed churches of All Saints, East Tuddenham, and St Mary, North Tuddenham and the grade II* listed West Lodge Farmhouse near Easton. We will comment on this impact of the proposed development on the setting of these heritage assets.

Archaeology

- 2.5 As development has the potential to harm archaeological deposits of interest, both directly and indirectly. A mitigation strategy has been presented by the applicant, which includes a programme of archaeological works that will inform preservation strategies, either preserving remains in situ or by record. We would accept the strategy in broad terms and consider that these matters are adequately covered in the proposed methodology. We will not comment on this strategy and associated documents in detail but are content for Norfolk County Council's Historic Environment Service to comment.

3. Historic England Advice: Historic Buildings and Areas

Comments in Regard to Environmental Statement Chapter 6, Cultural Heritage (document 6.1), Environmental Statement Appendices Appendix 6.1 Cultural Heritage Information (document 6.3), Environmental Statement Appendices Appendix 7.5 Representative Viewpoints (document 6.3) and Environmental Statement Figures

- 3.1 As noted in the introduction above the proposed development follows the route of the existing A47 from the point where it ceases being a dual carriageway to the west of Norwich at Easton to a point south of North Tuddenham. The existing A47 by-passes the historic settlements of Easton, Honingham, Hockering and North Tuddenham.
- 3.2 The Environmental Statement (ES) Chapter 6 (Cultural Heritage) and Appendix 6.1, Cultural Heritage Information consider the significance of the designated heritage assets affected by the proposed development and the effect on that significance. We would accept the findings but wish to comment in detail on the grade I and II* listed buildings.
- 3.3 The grade I listed church of All Saints, East Tuddenham (National Heritage List number 1077352) is considered and due to its distance from the proposed development it is concluded in the ES Chapter 6 that there would be no adverse impact on its setting. We would agree with that assessment.





- 3.4 The grade I listed church of St Mary, North Tuddenham (National Heritage List number 1169192) is considered and due to its distance from the proposed development it is concluded in the ES Chapter 6 that there would be no adverse impact on its setting. We would agree with that assessment.
- 3.5 The grade II* listed West Lodge Farmhouse near Easton (National Heritage List number 1050771) is considered as, although it does not have the height of the church towers falls with the Zone of Theoretical Visibility. Due to its distance from the proposed development, it is concluded in the ES Chapter 6 that there would be no adverse impact on its setting. We would agree with that assessment.
- 3.6 The grade I listed church of St Michael, Hockering (National Heritage List number 1077354) is considered as the proposed development would be relatively close. However, the carriageway alignment would take traffic further away from the listed building than the existing road. The works would also retain the existing road layout and plating which presently form part of the immediate setting of the church to its south. The Assessment in the ES Chapter 6 concludes that there would be no adverse impact on its setting. We would agree with that assessment.
- 3.7 St Peter's parish church at Easton is listed at grade I. It stands close to the southern side of the existing A47 and roundabout. The proposed development would increase the scale of the carriageway and junction in this area bringing the potential for a greater visual and audible effect on an experience of the historic building.
- 3.8 There is a summary of the historic significance of the building and its setting are contained in the ES volume 6, Appendix 6.1 (Cultural Heritage Information, 6.3.47-53). The church originated in the 12th century from which evidence of its round tower remains from its collapse in 1778. There is also other early fabric remaining including the ornate south doorway but large parts of the church also date from the 13th and 15th centuries.
- 3.9 The church stands in a modest churchyard at the top of gently rising land south of the valley of the river Tud. This position, between the river valley and the more open arable land to the south of the church, and the early date of some parts of the building could suggest evidence of early medieval settlement in the area. However, the church stands apart from any other historic building. Some 19th century houses can be found to the east on the Dereham Road but most of this development, including the current A47 is modern. That St Peter's was historically isolated in farmland also adds to its historic significance as the product of a rural community. Something of this quality can still be understood despite this modern development and the church retains a relatively secluded feeling which better facilitates an experience of it as an ancient sacred space.
- 3.10 As is noted in paragraph 6.3.49 of the ES chapter 6, appendix 6.1, the loss of the tower has made St Peter's less visible from Easton village and the planting on the east, west and northern sides screens it from views on these sides to





give the churchyard an 'enclosed' quality. Paragraph 6.8.11 of the ES chapter 6 acknowledges that the proposed removal of some existing planting and part of the earthen bank on the northern boundary of the churchyard and possible appearance of the new footbridge in views above the trees could affect the setting of St Peter's. Figures 7.6.8 (A-D) in the ES Figures (document 6.2) show a view from the southern part of the churchyard towards the church with the development behind. In figure 7.6.8C the proposed footbridge can be seen through the trees, giving an indication of the proximity and likely impact of the development. Figure 7.6.8D shows the proposed replacement planting mature at 15 years having reduced this visibility.

- 3.11 In addition to visibility part of this impact could also derive from traffic noise. Paragraph 6.3.51 of appendix 6.1 acknowledges that road noise can be heard from the existing A47 and that this can be intrusive. Chapter 6 of the ES (paragraph 6.8.24) assesses the effect of noise on the church and churchyard as having a 'minor adverse' impact but predicts that in the long term (after landscaping has matured over 15 years) the effects would be 'negligible'.
- 3.12 We would acknowledge that the proposed mitigation by landscaping will reduce the impact, both of sight and sound. The ES (chapter 6 paragraph 6.8.25) concludes that overall, the operational effects of the development would have a 'moderate adverse' effect. We would accept that conclusion and equate this impact with a degree of harm to the significance of the listed building. Placing this in terms of the National Networks National Policy Statement we conclude this would be 'less than substantial' harm under paragraph 5.134.
- 3.13 The historic significance of the grade II* listed parish church of St Andrew, Honingham and its setting are considered in paragraphs 6.3.54-60 of appendix 6.1 of Chapter 6 of the ES. St Andrew's chiefly dates from the early 14th century and this phase of work gives it its most notable features. The tall, elegant west tower with stepped angled buttresses dates from that period. The upper stage of the tower was added in the 15th century and has decorative flushwork panels of high quality and tall pinnacles which lend it a distinctive profile.
- 3.14 St Andrew's church lies at some distance from Honingham village and stands immediately to the north of the Norwich Road, the former main route into Honingham which has been upgraded to serve as part of the existing A47. To the west and north of the church are open fields which fall away towards where the River Tud loops around the higher ground on which the church stands. To the east is a sizeable area of woodland. The churchyard extends almost to the roadside with a pedestrian lychgate at its western side and white painted picket fences and gates at the vehicular entrance to the site on the eastern side. While the land on which the current A47 sits is level the church stands slightly above it which, combined by the open aspect of the churchyard makes the church a major landmark when seen from the road.
- 3.15 The setting of St Andrew's church could well suggest an early date for the establishment of settlement at this site, but the church is today isolated from





other historic building and the countryside remains rural on three sides. This rural setting contributes to an appreciation of the church's historic significance. The appearance and sound of traffic on the road detracts from the quiet and contemplative qualities of both church and churchyard, but the proposed development could significantly increase that effect as well as bring a much greater visual impact.

- 3.16 Paragraph 6.8.13 of the ES, chapter 6 Cultural Heritage states that the church 'would experience large scale changes to its setting' from the development. It goes on to note that the new Norwich Road junction would 'create urbanising elements in its current rural setting' and that there would be 'loss of rural views of the church from the south and west due to the new carriageway passing adjacent to the southwest corner of the churchyard.'
- 3.17 It is proposed to implement landscaping between the churchyard and current A47 and the new carriageway to soften views from the churchyard. The ES Figures (document 6.2) includes figure 7.6.7C showing a view from the churchyard boundary towards the Norwich Road junction. The landscaping when mature at 15 years is shown in figure 7.6.7D. We would accept that the proposed landscaping would reduce the visibility of the new road and traffic on it some extent. However, given the proximity of the carriageway, its elevation (and that of the Norwich Road junction) and lighting on the junction we consider that the sound and appearance of the road would still be appreciable from the churchyard and an intrusive experience.
- 3.18 Even with the landscaping the 'loss of rural views from the south and west' and 'urbanising' effect of the junction as noted by the applicants in 6.8.13 of the ES, chapter 6 Cultural Heritage, would remain. We therefore agree with the conclusion in that paragraph that there would be a 'major adverse' effect on the church and equate the impact with harm to the significance of the listed building, caused through development in its setting. Placing this in terms of the National Networks National Policy Statement we conclude this would be 'less than substantial' harm under paragraph 5.134, although the changes to the setting would be profound and this might be considered a quite high level of harm within that category.
- 3.19 During development of the project the applicant responded to our concerns about the proximity of the new carriageway, and in particular the visibility of Norwich Road junction (which would be elevated about the main carriageway), and the junction was moved to the east. We would acknowledge that this has brought a significant reduction in impact. Moving the carriageway and junction further south could reduce the impact further and potentially allow more space for a deeper belt of landscaping. However, we consider this would still bring the development into views of the church tower in its rural landscape from the south and so is unlikely to entirely remove the harmful impact.

4. Historic England Advice: Archaeology





Comments in Relation to Environment Statement Chapter 6, Cultural Heritage (document 6.1) and Environmental Statement Appendices Appendix 6.1 Cultural Heritage Information, Environmental Statement Appendices Appendix 6.3 Archaeological Evaluation

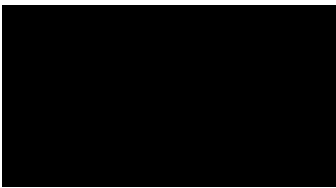
- 4.1 The potential impacts of the proposed Scheme have been summarised in the Environmental Statement (ES). Historic England is in agreement with the methodology used to assess the cultural heritage datasets in the Cultural Heritage Chapter of the ES and with the conclusions reached in relation to non-designated archaeological heritage assets. We consider that there will be both direct and indirect impacts on archaeological deposits and that the direct impacts could be significant for any below ground heritage assets located within the footprint of the proposed works as well as throughout the entire Principal Application Site. We have no further comment to make on this strategy and associated documents and are content for Norfolk County Council's Historic Environment Service to comment.

5. Conclusions

- 5.1 In terms of the potential impact on archaeology at the development site Historic England is satisfied with the assessment and evaluation methodology presented in Chapter 6 of the ES. A mitigation strategy has been presented by the applicant, which includes a programme of archaeological works that will inform preservation strategies, either preserving remains in situ or by record. We would accept the strategy in broad terms and consider that these matters are adequately covered in the proposed methodology. Non-designated buried archaeological remains fall within the remit of Norfolk County Council's Historic Environment Service and we will defer to them for detailed comments on this aspect of the scheme. However, Historic England maintain an interest in the non-designated buried archaeological remain as a provider of specialist archaeological science advice.
- 5.2 We are content with the assessment of the impact on historic buildings and areas carried out by the applicant and with their conclusions, although we would defer to the local planning authorities concerning impact on grade II listed buildings. We agree with the applicant that there would be a measure of harm to the historic significance of the grade I listed parish church of St Peter, Easton and the grade II* listed parish church of St Andrew, Honingham due to changes in their setting. We agree that this would be less than substantial harm in terms of the National Policy Statement for National Networks (NPSNN) paragraph 5.134. We would acknowledge the proposed mitigation in terms of landscaping at both sites and (during development of the project) redesign of the Norwich road junction have reduced the impact on the listed buildings.
- 5.3 The proposed development should be considered in terms of paragraph 5.131 of the National Policy Statement for National Networks, including giving great weight to the conservation of the heritage assets (St Peter's and St Andrew's churches). As paragraph 5.132 states any harmful impact on the significance of



the designated heritage assets in question should be weighed against the public benefit of development, recognising that the greater the harm to the significance of the heritage asset, the greater the justification that will be needed for any loss. As the level of harm would, in our view, be less than substantial we would recommend the requirements of paragraph 5.134 are applied so the harm should be weighed against the public benefits of the proposal.



David Eve
Inspector of Historic Buildings and Areas

