HERITAGE ASSESSMENT

LAND OFF GREENFIELD ROAD, EAST DEREHAM, NORFOLK

Client: Orbit Homes

19th February 2016
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SUMMARY

This Heritage Assessment has assessed the potential impact of the proposed development on land at Greenfield Road, East Dereham on below ground archaeology and on the setting and significance of nearby heritage assets. The assessment is based on documentary and map search and a site inspection in January 2016, which recorded the current condition of the proposed development site and surrounding heritage assets.

The surrounding landscape east of East Dereham includes heritage assets of national importance, dating, principally, from the Modern period. This reflects the changing nature of the historic landscape which has evolved from prehistoric forest through a later prehistoric period of, probably, arable farming to a period of re-forestation, and more recently, agricultural and modern residential development. The proposed development site, however, contains no recognized evidence of archaeologically significant activity and landscape trends suggest only low potential for remains of Roman period date. These, if present, would be of local significance.

The absence of archaeological evidence from the proposed development site has been noted, as has the low potential for significant archaeology to be present. In this circumstance a mitigation strategy is proposed to ensure that the development enhances the historic environment. This comprises Observation, Recording, Reporting and Archiving during development. This programme of works, secured by planning condition, will ensure that any archaeological evidence below ground will be recorded, should it be found, and that the impact of development will be no harm for the purposes of the NPPF.

The effect of development on the setting and significance of heritage assets with a zone of theoretical impact has also been assessed and mitigation of the visual effects of development designed as part of the proposed scheme. This comprises a green corridor created to maintain views of the Dereham windmill from the Hall Lane bridge over the A47. At Greenfield Road, Dereham the scale of the areas affected by residential development and the nature of the ground, together with the anticipated nature of the impact, suggests that the harm to the significance of the Dereham windmill will be modest to slight.
1.0 INTRODUCTION AND SCOPE OF STUDY

1.1 Introduction

1.1.1 This Heritage Assessment has been researched and prepared by Michael Dawson of CgMs Consulting, on behalf of Orbit Homes.

1.1.2 The assessment considers the impact of development in an area which is bounded by the A47 Norwich Road to the south and housing development along Wheatcroft Way and Elderberry Drive to the north. The site is largely flat land and occupies former farmland which, in 1999, was crossed by a temporary access road to facilitate housing development to the east. The site is centred at National Grid Reference TG 00331 12809 (Fig 1).

1.2 Scope of Study

1.2.1 The objectives of the report can be summarised as follows:

- To assess the potential of the proposed development area to contain archaeological evidence.

- To assess the potential survival of archaeology at the proposed development area, its condition and extent.

- To assess the potential significance of any archaeology and to examine whether this might be the subject of further evaluation or mitigation.

- To assess the potential impact of development on the significance of heritage assets due to construction within in their settings.

1.2.2 Evidence from published and archive sources and from Norfolk Historic Environment Records (HER) has been examined for the proposed development area. In addition, HER records and other evidence up to 750m surrounding the proposed development area have been examined to determine the landscape pattern of archaeological and historic development. The latter provides the basis for assessing the potential presence of archaeological data and to establish the baseline from which to assess the visual and perceptual impact of the proposed development.

1.2.3 The area covered by the Zone of Theoretical Visibility was also assessed by field inspection. The landscape, topography and vegetation were noted in relation to heritage
assets. This preliminary assessment was based on the potential impact of the proposed scheme on the landscape and in particular on the historic environment. Of specific concern was the potential impact on the setting of listed buildings, Conservation Areas, Scheduled Ancient Monuments (SAM), registered parks and gardens (RPG) and on assets considered to be of equivalent importance to designated historic assets. In the case of the Greenfield Road only one heritage assets, the Dereham windmill (Grade II) was deemed to be at risk.

1.2.4 The site was visited by Michael Dawson on 22nd January 2016.
2.0 **PLANNING BACKGROUND AND DEVELOPMENT PLAN FRAMEWORK**

2.1 **Introduction**

2.1.1 The principal source of law that forms the basis of this assessment is primary legislation, Planning (Listed Buildings and Conservation Areas) Act 1990. Guidance from government provides a useful aid to the interpretation and implementation of the law and of current government policy and the principal statement of government policy in England is the NPPF published in March 2012.

2.1.2 Further guidance on the application of policy has been published by English Heritage comprising Setting and Heritage Assets 2011 and more recently *Historic Environment Good Practice Advice in Planning Note 3 The Setting of Heritage Assets* (Historic England, 2015).

2.1.3 Development Plan Policy sets out the spatial vision, objectives and policies for managing development across the local authority area.

2.2 **National Legislation**

2.2.1 Legislation regarding buildings and areas of special architectural or historic interest is contained in the Planning (Listed buildings and Conservation Areas) Act 1990 (the 1990 Act).

2.2.2 Section 66 of the 1990 Act requires that:

(1) In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.

2.2.3 Sec 72 of the 1990 Act requires that:

(1) In the exercise, with respect to any buildings or other land in a conservation area, of any powers under any of the provisions mentioned in subsection (2), special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.

2.2.4 Protection of the fabric of Scheduled Ancient Monuments is established by the Ancient Monuments and Archaeological Areas Act 1979, the protection of their setting is rendered material by policy guidance (NPPF).
2.3 National Planning Policy Framework (March 2012)

2.3.1 In March 2012, the government published the National Planning Policy Framework (NPPF).

2.3.2 The NPPF promotes sustainable development as a fundamental theme in planning and provides a series of ‘Core Planning Principles’ (Paragraph 17). These core principles of sustainable development highlight that planning should be a creative exercise in finding ways to enhance and improve the places in which people live, that it should secure high quality design and a good standard of amenity, and that heritage assets should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations.

2.3.3 The guidance that relates to the historic environment and developments which may have an effect upon it is contained within Section 12, ‘Conserving and Enhancing the Historic Environment’, Paragraphs 126-141.

2.3.4 Heritage Assets are defined in Annex 2 of the NPPF as: a building, monument, site, place, area or landscape positively identified as having a degree of significance meriting consideration in planning decisions. They include designated heritage assets (as defined in the NPPF) and assets identified by the local planning authority.

2.3.5 A Designated Heritage Asset comprises a: World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area.

2.3.6 Significance is defined as: The value of a heritage asset to this and future generations because of its heritage interest. This interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting.

2.3.7 Setting is defined 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 an asset, may affect the ability to appreciate that significance or may be neutral.

2.3.8 In paragraph 128, the NPPF states that when determining applications, LPAs should require applicants to describe the significance of the heritage assets affected and any contribution made by their setting. The level of detail provided should be proportionate to the significance of the asset and sufficient to understand the impact of the proposal on this significance. According to Paragraph 129, LPAs are also obliged to identify and assess the significance of any heritage asset that may be affected by a proposal and
should take this assessment into account when considering the impact upon the heritage asset.

2.3.9 Paragraph 131 emphasises that local planning authorities should take account of the desirability of new development making a positive contribution to local character and distinctiveness.

2.3.10 Paragraph 132 states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation. It emphasises that the weight given to an asset’s conservation should be proportionate to its significance, and that clear and convincing justification will be required for loss and harm to heritage assets.

2.3.11 Paragraph 132 states that ‘substantial harm’ or loss of a designated heritage asset of the highest significance (i.e. Grade I and II* listed buildings, grade I and II* parks and gardens, scheduled monuments, wrecks, battlefields and World Heritage Sites) should be wholly exceptional. It also states that substantial harm to grade II listed buildings and parks and gardens should be exceptional. The NPPF does not define further what is meant by substantial harm.

2.3.12 Paragraphs 133 and 134 address the balancing of harm against public benefits. This guidance lays down a clear dividing line between causing substantial harm or total loss of significance on the one hand, and those cases where the harm is less than substantial. Proposals that would result in substantial harm or total loss of significance should be refused, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss. The guidance emphasizes that where less than substantial harm will arise as a result of a proposed development, this harm should be weighed against the public benefits of a proposal.

2.3.13 The National Planning Practice Guidance (updated 10th April 2014)

2.3.14 The NPPF is supported by the National Planning Practice Guidance (NPPG) which is an on-line resource, updated in April 2014. In relation to the historic environment, paragraph 001 states that:

Protecting and enhancing the ‘historic environment’ is an important component of the National Planning Policy Framework’s drive to achieve sustainable development (as defined in Paragraphs 6-10). The appropriate conservation of heritage assets forms one of the ‘Core Planning Principles’.

2.3.15 Paragraph 002 makes a clear statement that any decisions relating to listed buildings and their settings and conservation areas must address the statutory considerations of
the Planning (Listed Buildings and Conservation Areas) Act 1990 as well as satisfying the relevant policies within the National Planning Policy Framework and the Local Plan.

2.3.16 The key element of the NPPG in relation to this application relates to the setting of heritage assets. This is addressed in paragraph 013 where the guidance stresses assessment of the impact of a proposed development on the setting of a heritage asset needs to take into account, and be proportionate to, the significance of the asset being considered and the degree to which the proposed development enhances or detracts from the significance of the asset and the ability to appreciate the significance. Paragraph 013 outlines that the setting of an asset may be more extensive than its curtilage.

2.3.17 The NPPG notes that although the extent and importance of setting is often expressed in visual terms, it can also be influenced by other factors such as noise, dust and vibration. Historic relationships between places can also be an important factor stressing ties between place that may have limited or no intervisibility with each other. There may be historic, as well aesthetic connections that contribute or enhance the significance of one or more of the heritage assets.

2.3.18 Paragraph 013 concludes stating:

The contribution that setting makes to the significance of the heritage asset does not depend on there being public rights or an ability to access or experience that setting. This will vary over time and according to circumstance. When assessing any application for development which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change. They may also need to consider the fact that developments which materially detract from the asset’s significance may also damage its economic viability now, or in the future, thereby threatening its ongoing conservation.

2.3.19 Paragraph 017 of the NPPG provides additional guidance on substantial harm. It states:

What matters in assessing if a proposal causes substantial 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. 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.

2.3.20 The harm may arise from works to the asset or from development within its setting. While the impact of total destruction is obvious, partial destruction is likely to have a considerable impact but, depending on the circumstances, it may still be less than substantial harm or conceivably not harmful at all, for example, when removing later inappropriate additions to historic buildings which harm their significance. Similarly, works that are moderate or minor in scale are likely to cause less than substantial harm or no harm at all. However, even minor works have the potential to cause substantial harm.

2.3.21 Paragraph 134 of the NPPF outlines that where a proposed development results in less than substantial harm to the significance of a heritage asset, the harm arising should be weighed against the public benefits accruing from the proposed development. Paragraph 020 of the NPPG outlines what is meant by public benefits:

Public benefits may follow from many developments and could be anything that delivers economic, social or environmental progress as described in the National Planning Policy Framework (Paragraph 7). Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and should not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits.

2.3.22 Historic Environment Good Practice Advice in Planning Note 3

The Setting of Heritage Assets (Historic England, 2015)

2.3.23 Historic England has recently published guidance concerning the assessment of effects on the setting of heritage assets (Historic Environment Good Practice Advice in Planning Note 3 The Setting of Heritage Assets, March April 2015). This guidance proposes a five stage programme of assessment: (1) identifying the assets affected, (2) assessing the contribution setting makes to significance, (3) assessing the effect of the proposed development, (4) maximising enhancement and minimising harm, (5) making and monitoring the decision and outcomes. The methodology adopted for the purposes of this assessment, the details of which are set out in the Appendix, has had

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1 PPS 5: Historic Environment Planning Practice Guide (Communities and Local Government (DCLG), English Heritage, Department of Culture, Media and Sport (DCMS), March 2010 has now been withdrawn with effect from 27th March 2015.
regard to and is broadly based upon the five stage programme of assessment referred to in the guidance.²

2.3.24 The document defines the extent of setting with reference to the following:

- That it is not fixed and may change according to new information or understanding
- That it can include many assets (such listed buildings within a Conservation Area, which may have settings of their own).
- That it may reflect the wider character of a townscape or landscape
- That in urban areas it is linked to consideration of townscape and urban design.

2.3.25 The guidance sets out a staged process for assessing the implications of proposed developments on setting:

1. Identification of heritage assets affected and their settings
2. Assessment of whether and what contribution the setting makes to the significance of a heritage asset.
3. Assessing the effects of proposed development on the significance of a heritage asset.
4. Maximising enhancement and reduction of harm on the setting of heritage assets.
5. Making and documenting the decision and monitoring outcomes.

2.3.26 The guidance reiterates the NPPF in stating that any harm to significance, should be weighed against the public benefits of the scheme.

² Based originally on The Setting of Heritage Assets (English Heritage, 2011)
2.3.27 Case Law

2.3.28 Consideration of the Court of Appeal decision in relation to Barnwell Manor Wind Energy Ltd v East Northamptonshire District Council [2014] EWCA Civ 137

2.3.29 Of relevance to this application is the recent Court of Appeal decision of Barnwell Manor Wind Energy Ltd v East Northamptonshire District Council [2014] EWCA Civ 137, issued on 18 February 2014. The case relates to the quashing by the High Court of a decision of a Planning Inspector to grant planning permission for a four-turbine wind farm on land north of Catshead Woods, Sudborough, Northamptonshire. There were three grounds of challenge presented to the High Court against the Inspector’s decision to grant planning permission, all three of which were then considered further by the Court of Appeal. These were:

1. The Inspector had failed to have special regard to the desirability of preserving the settings of Listed Buildings, taking into account Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990. The Court of Appeal ruled that it was Parliament’s intention in enacting section 66(1) of the 1990 Act that decision-makers should give “considerable importance and weight” to the desirability of preserving the setting of listed buildings when carrying out the balancing exercise.

2. The Inspector either misapplied planning policy guidance in relation to substantial harm to the significance of listed buildings or, if he correctly applied it, he failed to give adequate reasons for his conclusion that the harm to the setting of the listed buildings involved would in all cases be less than substantial. The Court of Appeal concluded that the Inspector did not assess the contribution made by the setting of Lyveden New Bield (the key listed building involved, to its significance as a heritage asset. The Inspector considered there to be less than substantial harm to the significance as he considered that the wind farm would not be so distracting that it would not prevent, or make unduly difficult, an understanding, appreciation or interpretation of the significance of the elements that make up Lyveden New Bield or Lyveden Old Bield or their relationship to each other. The Court of Appeal considered that ability of the public to appreciate a heritage asset is one, but not the only, factor to be considered when assessing the contribution that setting makes to the significance of a heritage asset. The contribution that setting makes does not depend on there being ability to access or experience the setting.

3. The key issue in the 3rd ground considered by the Court of Appeal was that the Inspector had concluded that there was not substantial harm as any ‘reasonable observer’ would be able to see and understand that the wind farm was a modern
addition to the landscape, separate from the planned historic landscape, or building they were within, or considering, or interpreting. The ruling outlined that the policy guidance in PPS5 and the Practice Guide does not suggest that the question whether the harm to the setting of a designated heritage asset is substantial can be answered simply by applying the "reasonable observer" test adopted by the Inspector. The Court of Appeal concluded that:

"If the "reasonable observer" test was the decisive factor in the Inspector’s reasoning, as it appears to have been, he was not properly applying the policy approach set out in PPS5 and the Practice Guide. If it was not the decisive factor in the Inspector’s reasoning, then he did not give adequate reasons for his conclusion that the harm to the setting of Lyveden New Bield would not be substantial. Since his conclusion that the harm to the setting of the designated heritage assets would in all cases be less than substantial was fed into the balancing exercise in paragraphs 85 and 86, the decision letter would have been fatally flawed on grounds 2 and 3 even if the Inspector had given proper effect to the section 66(1) duty. (Para 44)

2.3.30 The key outcome of the ruling in relation to this application is that Section 66 of the 1990 Act requires the decision maker to give considerable importance and weight to the desirability of preserving the setting of the listed building when balancing harm against benefit as required by paragraphs 133 and 134 of the NPPF. This is a matter of process in the decision making rather than a change in the way that impact and harm is assessed. The Barnwell Manor ruling does not require that the effect and, therefore, harm to an asset arising from a proposed development to be assessed any higher than prior to the ruling. That is, harm arising from a development is based on the effect it has on the contribution that setting makes to the significance of a heritage asset. The Court of Appeal ruling stresses that it is the weight that is accorded to the harm that is the important element in the test for the decision maker. This in turn leads to the appropriate weighting of the harm arising from a development against the public benefits accrued from the development. This does not require for the level of harm arising to be automatically graded as being higher as the nature of the harm is dependent on how it affects the significance of the asset (see para 2.35 below). The test is the weight that is put on this harm in the planning balance.

2.3.31 The second key outcome from the Barnwell Manor ruling is the importance of adequate articulation of how the assessment of harm has been arrived at. The assessment of the level of harm on listed buildings has to be based on the contribution that the setting of an asset makes to its significance and how a proposed development affects this. This should not be on such narrow grounds such as whether a reasonable observer would always be able to understand that / know that the latter was a modern
addition to the landscape. The process required here is the 5 staged approach to the assessment of the setting of a heritage asset as outlined in English Heritage’s Setting of Heritage Assets (2011) as outlined in paragraphs 2.29-2.32 above.

2.3.32 Another, recent, judicial review case in the High Court is also relevant (Bodham, NNDC v SSCLG & Mack 21/1/4). Here the impact was of a turbine on Barningham Hall and in this case Robin Purchase QC supported the findings of the Barnwell case.

2.3.33 Finally, a yet more recent case Forge Fields V Sevenoaks District Council (12th June 2014) was before Mr Justice Lindblom in the High Court who noted in para (48) As the Court of Appeal has made absolutely clear in its recent decision in Barnwell, the duties in sections 66 and 72 of the Listed Buildings Act do not allow a local planning authority to treat the desirability of preserving the settings of listed buildings and the character and appearance of conservation areas as mere material considerations to which it can simply attach such weight as it sees fit. If there was any doubt about this before the decision in Barnwell it has now been firmly dispelled. When an authority finds that a proposed development would harm the setting of a listed building or the character or appearance of a conservation area, it must give that harm considerable importance and weight.

2.3.34 In a recent decision by the Secretary of State (APP/L2630/A/13/2196884) the impact of less than substantial harm caused by a proposed development on Wymondham Abbey was considered. In supporting the inspector, Mr J P Sargent, the Secretary of State agreed that the harm to the setting by the proposed development amounted to less than substantial harm and that ‘like the inspector, and taking into account the Barnwell Manor judgement, he considered that this is still a level of harm to which considerable weight and importance should be attached’ (SoS 14/IR130).

2.3.35 In short, these court decisions (and the recent Secretary of State’s decision) emphasise that a local authority or an inspector, at appeal, must demonstrate ‘special regard’ has been given to the desirability of preserving the building or setting. The judgements also emphasise that heritage assessment should consider a wide range of factors in assessing impact, not simply relying on single issues such as whether a visitor can distinguish between historic and modern features without it affecting their understanding of a monument. The Barnwell decision emphasizes the breadth of potential factors affecting the relationship between setting and significance.

2.4 Local Plan Policy

2.4.1 The adopted Breckland Local Plan comprises of a suite of Development Plan Documents that set out the strategic planning policies for the whole of the authority’s administrative area. These development plan documents have been prepared under
2.4.2 The Core Strategy, adopted in 2009, outlines the vision and overall objectives for development in Breckland up to 2026 and sets out where new housing and other development should be focused.

2.4.3 The Core Strategy also contains the district-wide Development Control policies for Breckland that will inform future planning decisions. These cover specific topics such as affordable housing, housing density, employment, retail, tourism, protecting rural facilities, re-use of rural buildings, flood risk, and protecting the natural and built environment.

2.4.4 Breckland Core Strategy and Development Control Policies Development Plan Document December 2009

Policy DC 17 Historic Environment

Any development that will affect a Listed Building or a Conservation Area will be subject to comprehensive assessment. New development will be expected to preserve and enhance the character, appearance and setting of Conservation Areas, Scheduled Monuments, Historic Parks and Gardens and other areas of historic interest. Where a proposed development will affect the character or setting of a Listed Building, particular regard will need to be given to the protection, preservation and enhancement of any features of historic or architectural interest.

The conversion of buildings of particular architectural or historic merit for economic or residential purposes in locations that would otherwise be unacceptable will be considered where this would ensure the retention of the building. Proposals will be considered against relevant guidance including national policy advice (currently PPS7 & PPG15) and specialist publications such as ‘Enabling Development and the Conservation of Significant Places’ produced by English Heritage.

Sites of archaeological interest and their settings will be protected, enhanced and preserved; development which has an unacceptable impact upon a site of archaeological interest will not be permitted. Where it is considered appropriate in cases where development coincides with the location of a known or suspected archaeological interest an archaeological field evaluation will be required. Where the
benefits of a particular development are considered to outweigh the importance of retaining archaeological remains in situ satisfactory excavation and recording of remains will be required before development is begun.

Replacement of dwellings

In the case of traditional dwellings (11) which positively contribute to the character of Breckland, replacement will only be acceptable where the application is accompanied by a Design and Access Statement which includes a structural survey that demonstrates that the demolition is necessary and that there is no alternative and viable solution of renovation to provide an acceptable standard of accommodation.

2.4.5 Conclusion: In considering any planning application for development, the planning authority will be mindful of the framework set by government policy, in this instance the NPPF, by current Development Plan Policy and by other material considerations.
3 ASSESSMENT METHODOLOGY

3.1 Introduction

3.1.1 This assessment of the predicted effects of the proposed development at Greenfield road, Dereham, on heritage assets, has involved the following stages:

- Data gathering from national, regional and local sources to establish the constituents of the historic environment.
- Site based inspection and confirmation of the baseline conditions of the historic environment.
- Desk based assessment to establish the potential for direct impacts within the proposed development site boundary.
- Appraisal of the topography to assess the level of impact on heritage assets through the visual impact on their settings.
- Assessment of the predicted effects of the development on the heritage assets identified as being constituents of the historic environment and forming the baseline conditions.
- Consideration of the policy protection afforded to heritage assets within legislation and national, regional and local planning policy.

3.1.2 Guidance consulted in this assessment has included:

- National Planning Policy Framework [NPPF 27th March 2012]
- The Setting of Heritage Assets [English Heritage Oct 2011]
- Ancient Monuments and Archaeology Areas Act 1979
- Planning (Listed Buildings and Conservation Areas) Act 1990
- Seeing History in the View [English Heritage 2011]
- Historic Environment Good Practice Advice in Planning Note 3 The Setting of Heritage Assets [Historic England, 2015]

3.1.3 In addition to the guidance above, The Norfolk Historic Landscape Characterisation (HLC) Project was used when establishing the baseline conditions of the visual envelope.

3.1.4 In considering the indirect impact of the proposed development, the difference in emphasis between statute and guidance has been noted. In primary legislation, the test with regard to listed buildings is whether special regard has been paid to the
preservation of their settings. In concert the NPPF emphasises an approach in which the salient point is whether the contribution that setting makes to the significance of a heritage asset is so affected that the significance of the asset (i.e. its value) is altered, whether positively or negatively. This is expressed by NPPF paragraph 132 ‘Significance can be harmed or lost through alteration or destruction of the heritage assets or development within its setting’. NPPF para 137 notes that local planning authorities should treat favourably applications that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset. In circumstances where an application does not do this, local planning authorities are required to ‘weigh any [such] harm against the wider benefits of the application’ (para 134).

### 3.2 Impact Assessment Methodology

#### 3.2.1 Direct Harm or Loss

The assessment of direct harm or loss to heritage assets has been approached by survey in accordance with NPPF. This policy requires ‘developers to submit an appropriate desk based assessment and, where desk based research is insufficient, to properly assess the interest, through a field evaluation’.

#### 3.2.3 Indirect Harm or Loss through Effects on the Setting of Heritage Assets

This assessment takes account of the potential visual and perceptual impacts of the proposed residential development at Greenfield Road on the settings of heritage assets which in this case comprise the; listed Dereham windmill.

The setting of heritage assets within the visual envelope has been considered as part of this assessment. The visual envelope is based upon a study area of 100m radius within which elements of the proposed development can be seen or distinguished as separate from existing development.

The setting of assets is defined by 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 an asset, may affect the ability to appreciate that significance or may be neutral’.

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1 Section 66, Town and country Planning Act 1990
3.2.7 Historic England, as English Heritage, has published guidance on the factors that should be considered when assessing impacts on the setting of heritage assets and these factors are listed below and have been taken into account where relevant in this assessment:

- Visual dominance
- Scale
- Intervisibility
- Vistas and sight-lines
- Movement, sound and light impacts
- Unaltered settings

3.2.8 Historic England (English Heritage) has also published recent advice concerning the assessment of effects on the setting of heritage assets (The Setting of Heritage Assets, 2015). This advice proposes a five stage programme of assessment: (1) identifying the assets affected, (2) assessing the contribution setting makes to significance, (3) assessing the effect of the proposed development, (4) maximising enhancement and minimising harm, (5) making and monitoring the decision and outcomes. The methodology adopted for the purposes of this assessment, the details of which are set out below, has had regard to this and is broadly based upon the five stage programme of assessment referred to in the guidance.

3.2.9 The methodology adopted for the purposes of this assessment consists of a staged process, as follows:

- **Step 1:** The baseline heritage assets located within the study area are identified and their heritage significance described as required by NPPF.
- **Step 2:** The setting of each heritage asset forming part of the baseline is identified and described.
- **Step 3** The contribution which setting makes to the heritage significance of the asset is then determined.
- **Step 4:** The magnitude of the impact on the heritage significance of each heritage asset is identified. This is a measure of the degree to which the heritage significance of the asset will be increased or diminished by the proposed development. Where the only potential impact is on the setting of the heritage asset, only that part of the heritage significance derived from its setting can be affected. The assessment of magnitude of impact must therefore be weighted proportionately. REGARD is had at this stage and, where relevant, to the factors referred to above, together with development attributes taken from Historic England’s advice on the Setting of Heritage Assets, 2015. Having identified the magnitude of impact, the sensitivity of
an asset to impacts on its heritage significance is considered by reference to the
heritage importance of the asset and the policy protection it is afforded in statute
or policy and the level of harm identified. The criteria used to signify the level of
heritage importance assigned to each of the assets included within this assessment
are set out in Appendix 4 below.
4 BASELINE – HISTORIC ENVIRONMENT

4.1 The Historic Environment

4.1.1 The area within which the development is proposed lies within the parish of East Dereham. The proposed development will be constructed on almost level ground to the south of the former line of Hall Lane and astride the proposed route of Greenfield Road, east of East Dereham. The Historic Landscape Character assessment by Norfolk County Council 2004 describes the immediate area of the proposed development as part of an area of 20th century agriculture, subject to parliamentary enclosure with some later boundary loss. Modern field patterns have a short chronological range. They are the product of change and development since the 19th century, and mostly since World War II. Modification of such field patterns is not a completed process however; it is still ongoing. According to locality, from farm to farm, there is variation in the age of these field patterns.

4.1.2 The visual envelope within which the development can be seen is limited by the level topography, the embankment flanking the A47 and existing housing which largely encloses the site to east and west. An area of greenspace surrounds the grade II listed windmill. The existing buildings have reduced significant visibility to little over 100m. In carrying out this Heritage Assessment in respect to the effect of the setting of heritage assets the diminishing visual effect of the proposed development together with the significance quotient of heritage assets provides the framework for Stage 1 and the identification of heritage assets which might be affected by the proposed development.

4.2 Geology and topography

4.2.1 Geology

4.2.2 The British Geological Survey indicates that the solid geology of the site comprises the White Chalk Subgroup, a sedimentary bedrock formed approximately 66 to 100 million years ago in the Cretaceous Period when the local environment was dominated by warm chalk seas. These rocks were formed in warm shallow 'Chalk' shelf seas with little sediment input from land. They often consist of a calcareous ooze of the microscopic remains of plankton, especially the disc shaped calcite plates or coccoliths that make up the spherical coccolithophores.4

4 http://www.bgs.ac.uk/discoveringGeology/geologyOfBritain/viewer.html accessed 8/1/16
4.2.3 The drift geology comprises glacial Till - Diamicton. These are geologically superficial deposits formed up to 3 million years ago in the Quaternary Period when the local environment was dominated by Ice Age conditions. These rocks were formed in cold periods with Ice Age glaciers scouring the landscape and depositing moraines of till with outwash sand and gravel deposits from seasonal and post glacial meltwaters.

4.2.4 The soil types are generally re-deposited clays and shale.

4.2.5 **Topography**

4.2.6 The proposed development area is located to the east of the historic small town of East Dereham lying in the parish of Dereham, Norfolk. The topography is almost level ground at approximately 52m AOD. To the south the ground falls away gently towards Yaxham and Mattishall, whilst to the north the land rises gently towards Swanton Morley before the shallow valley of the River Wensum some 5-6km away. The development area is rough grassland, former farmland.
5.0 **ARCHAEOLOGICAL AND HISTORICAL BASELINE**  
(Including Map Regression Exercise)

5.1 **Introduction**

5.1.1 The Heritage Assessment which follows is divided into two parts. In the first, the direct impact of the proposed development is addressed with reference to heritage assets within 750m of the proposed development, based on an HER search at Norfolk County Council. It is founded on the principles of NPPF and summarises the sequence of documentary, survey and other evidence for historic and archaeological activity in a short descriptive section. From this evidence of patterning in the landscape an assessment of the likely direct impact of the proposed expansion is made (Sec 7). In the second part of this assessment the visual impact of the development on the heritage assets within the visual envelope is assessed based on the staged approach outlined in section 3 above. A gazetteer of heritage assets is provided at Appendix 1.

5.1.2 Data obtained from Historic England and the Local Planning Authority confirms that there are no designated heritage assets (Listed Buildings, Scheduled Monuments, Conservation Areas, Registered Battlefields or Parks and Gardens) on the application site.

5.1.3 The data obtained from the county HER includes records within the search area in which metal detecting and field walking have produced ‘spreads’ of material. This evidence is included in the assessment below and, where appropriate, attention is drawn to the nature of finds which in some cases are likely to have resulted from chance loss, such as shoe buckles or horse trappings, in contrast to those related to task specific events which might indicate settlement or short term sedentary activity.
5.2 Archaeology and Historic Baseline

Prehistoric

<table>
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<tr>
<th>Period</th>
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<tr>
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</tr>
<tr>
<td>Bronze Age</td>
<td>1,800 BC</td>
<td>600 BC</td>
</tr>
<tr>
<td>Iron Age</td>
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Historic

<table>
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</thead>
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<td>410</td>
</tr>
<tr>
<td>Saxon/Early Medieval</td>
<td>AD 410</td>
<td>1066</td>
</tr>
<tr>
<td>Medieval</td>
<td>AD 1066</td>
<td>1485</td>
</tr>
<tr>
<td>Post Medieval</td>
<td>AD 1486</td>
<td>1749</td>
</tr>
<tr>
<td>Modern</td>
<td>AD 1750</td>
<td>Present</td>
</tr>
</tbody>
</table>

Timescales used in this report

5.2.1 Palaeolithic

5.2.2 A single Palaeolithic flint flake has been recovered from agricultural land close to Neatherd Moor (HER25485), although no finds have been made within the proposed development area.

5.2.3 The presence of Palaeolithic archaeology is notoriously hard to predict. The majority of evidence from the wider region is from stray artefacts with few in-situ sites and represents re-deposited material found amongst glacial outwash. Overall, the proposed development area can probably be defined as having a very low potential.

5.2.4 Prehistoric: Mesolithic, Neolithic, Bronze Age

5.2.5 There is no Mesolithic, Neolithic, Bronze Age or Iron Age evidence recorded from the development site itself on the Norfolk HER, but prehistoric material has been found within the 750km radius search area.

5.2.6 By the later prehistoric period the proposed development area would probably have lain in a landscape exploited for agriculture and settlement. The location within the open ground of the Breckland, south of the River Wensum, could have supported settlement during the Neolithic, Bronze Age and Iron Age although it is most likely
that the area was farmland, perhaps cleared during the Neolithic, as farming practice became increasingly sedentary.

5.2.7 Despite the absence of prehistoric evidence recorded from the proposed development area its topographical location and evidence from the wider study area, which includes a polished Neolithic Axe (HER28302) and scrapers (HER25485, 24990) other flint (HER28321, 32832), possibly early pre-historic ditches (HER19012), Bronze Age hearths (HER 2843, 2844, 10832) and pits HER58061, suggests there is slight potential for below ground archaeology of these periods. The prehistoric material of both Neolithic and Bronze Age date forms two broad clusters. One lies to the north on marginally higher ground (c53m AOD) on Neatherd Moor, the other to the south beyond Old Hall Farm and there is single pit possibly indicating settlement on the route of the A467 (HER10832). This pattern correlates with the findings of the regional the Research Frameworks Project (1997, 2011) which highlights period specific expectations and emphasizes the potential of higher ground from the Mesolithic period onwards. Valley bottom sites, as a focus for task specific activity and later more sedentary settlement, increase in significance during the Neolithic and later prehistoric periods.

5.2.8 Iron Age material has been found in only one location (HER19306), to the east of the proposed development site beyond the Badley Moor Nursery. Once again this suggests a preference for slightly higher ground by communities during the 1st millennium BC. The archaeological evidence outlined above suggests potential of the proposed development site to include evidence from the later prehistoric period is low and that any material found is likely to be local in significance.
5.2.9 **Roman**

5.2.10 Evidence of Roman period activity has been found to the east of the proposed development site (HER37541, 19306, 19014) in two locations which may indicate the site of an extended agricultural settlement of fields and dwellings. Such sites are typical of the Roman period and form part of a spare settlement pattern in which rural communities tend towards the slightly higher ground.
5.2.11 Historically the proposed development site lies in an area of Norfolk in which Roman activity is characterised as predominantly rural but in the later Roman period became associated with the military in an area described as the Saxon Shore. In 1997 Chris Going noted that 'study of ... rural settlement had not progressed as rapidly as might be desired' (Going 1997, 38) a sentiment echoed in the more recent revision of the Research Frameworks (Medleycott, 2011, 31, 46-47). In the study area evidence of Roman period activity is predominantly metal detector finds, though none have been recovered from the proposed development area. The metal detected finds may represent areas of metal detector activity rather than Roman period settlement but the pattern of finds on the higher ground, nevertheless, suggests that the proposed development area may have slight potential for Roman period archaeology. Were such evidence to be recovered it is likely, in comparison with the sites known from the HER, to be of local significance.

5.2.12 **Anglo-Saxon, Medieval and Early Post-Medieval**

5.2.13 In the post-Roman and Anglo-Saxon period the proposed development area lay on land which was to become the parish of East Dereham although the settlement centre of East Dereham was some way to the west.

5.2.14 The earliest record of Dereham dates to AD 903 when the manor was granted to the monastery of Ely, by Ethelwold Bishop of Winchester, in the reign of the King Edgar. At Domesday (1086) it remained with the church of St Edeldrede, the monastery of Ely. The manor comprised five carucates\(^6\) of land with 16 villains\(^7\), 25 borderers\(^8\). The land was managed with 3 carucates in demean\(^9\), and 7 amongst the tenants, with pannage\(^10\) for 300 swine. The manor had three mills with three beasts of burden, twelve young cattle, 20 swine, 100 sheep, 7 socmen\(^11\), 30 acres of land, and 2 of meadow, 3 acres of wood.

5.2.15 This lordship continued as part of the possession of the monastery of Ely until the foundation of the Bishop’s see there in 1109, when it was assigned to the Bishop, and

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\(^6\) The amount of land which could be ploughed by 8 oxen in a year, some 120 customary acres

\(^7\) Farmers of substantial standing, forerunner of later yeomen farmers

\(^8\) Usually a map who had built a cottage on the edge of common or waste, usually a grade or servile tenure below villain.

\(^9\) The home farm, land retained by the lord for his own use and worked on by tenants in part return for their tenancies elsewhere.

\(^10\) Right of tenants to pasture their pigs in the lord’s woods

\(^11\) Tenants who owed rent but not military service
made a part of his barony. The parish remained under the Bishop until the parish was taken from the church by Elizabeth I.

5.2.16 The HER records several locations from which medieval artefacts have been recovered (HER19306, 25593, 255594, 28232, 30949). Of these the strap end (HER30949), harness stud and Jews harp (HER 28321), brass harness stud (HER25594), late Saxon pin, buckle and coins (HER25593), probably reflect chance losses. Nevertheless the pottery (HER19306) and grouping of finds (HER 25593, 25485, 28321) may indicate somewhat isolated farms within the parish. There is no medieval evidence, however, from either the development area or the immediate vicinity which suggest the location of medieval activity beyond agriculture. The location of the proposed development site suggests that whilst the focus of medieval activity was East Dereham itself the slightly raised location within the Breckland could have been cultivated from before the 11th century.

5.2.17 Although there is no present day evidence of ridge and furrow within the proposed development site, the nature of the evidence suggests medieval activity within the proposed development area is most likely to be related to agriculture and, therefore, of local significance.

5.2.18 **Post Medieval and Modern (including map regression exercise)**

5.2.19 Map and documentary evidence provides a wealth of detail for the proposed development site during the Post Medieval and Modern periods. The proposed development area appears to have remained agricultural land farmed by the Harbord family, Lords of Effingham, during the 17th century, when the parish was recorded by Blome in Britannia 1673 as ‘abounding in woollen yarn’. It suggests a large part of the parish was given over to grazing. However, by the end of the 18th century the woollen cloth industry in Norfolk was in decline and, whilst Dereham was still noted for its woollen market, the 19th century saw an upsurge in arable farming.

5.2.20 Medieval farming in Norfolk had developed its own system of agriculture based on whole year and half year lands, but progressively from the 17th century enclosure of common land in the parish took place. The earliest is that of the ‘great close or Hundred acre close lying in South field’ and successive episodes are known from 1626, 1676, 1765, and 1792. The earliest map of the area by Faden is at too small a scale to show individual fields but by 1815 the large scale Enclosure Award Map based on the

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Act of 1810 shows individual fields belonging to Thomas Wright Esq, Thomas Utting, W W Lee-Warner on behalf of the Church, the Rev C H Wollaston and the Right Honourable Harriett, Dowager Countess of Essex.

5.2.21 The HER has recorded elements of the modern landscape as development increased throughout the 19th century. Just to the north of the proposed development site the Dereham (Cherry Lane) windmill was built in 1836. One of three windmills it was wind-powered and remained in use until 1922 when the sails were removed. It continued to grind corn using a steam engine until the 1930s when it became derelict. From 1986 it was restored and refurbished with new curb ring, cap, sails and fantail. The mill was initially opened to the public, but later closed and after several years was taken into local authority ownership, opening as a community exhibition centre in 2013 with permission for café and toilet block.

5.2.22 The windmill reflects the rising price of grain in the years following the Napoleonic Wars. Increasingly the parish farmland was turned to arable and by the mid-century a significant local malting trade had developed. At the same time the construction of railways provided transport for farm produce to the nearby market of Norwich as well as further afield.

5.2.23 The OS series shows the gradual erosion of the smaller field boundaries of the 1810/15 inclosure to create larger arable fields. The close adjacent to the windmill retained its long narrow form from enclosure, but was subdivided longitudinally and by 1929 small buildings can be seen just within the northern boundary of the proposed development site. These remained until the 1950s and may have survived until the 1990s when Cherry Lane, which ran to the north of the windmill had become a track and Greenfield Road had been constructed to the south. It is likely the remains of these buildings were removed in the 1990s when the temporary development road was constructed (see Fig 5).

5.2.24 The pattern of land use during the late 19th and 20th century, summarised above, suggests there is no potential for significant archaeology of the modern period at the site. The creation of Greenfield Road to the south of the windmill has almost certainly removed most of the evidence of the small buildings in the southern part of the windmill close. The map evidence suggests there is no potential here for significant archaeology of the modern period.

5.3 Assessment of Significance: Below Ground Archaeology

5.3.1 There are no designated archaeological assets within the study site. In the wider study area the Dereham (Cherry Lane) windmill is the only building of historic interest within visual range of the proposed development. The setting of the windmill includes open
greenspace and modern housing. The function of the windmill as community exhibition centre and its visibility in the area of Greenfield Road suggests that development will not affect its significance due to changes in its setting and it will not be harmed by the proposed development. The impact of development is considered in Section 7 below.

5.3.2 The potential of the site to have been the location of significant archaeological activity has been examined above, period by period, from the early prehistoric to the modern period. The potential of the topography to have been the site of significant remains from the early prehistoric (Palaeolithic to Neolithic) has been assessed as low and given the nature of later agricultural activity the significance of any surviving evidence from this period is likely to be eroded and therefore, of only local interest.

5.3.3 Evidence from the later prehistoric period has also been examined and the potential of the site to have been the location of significant activity from the later Neolithic to late Iron Age has been assessed as low with activity most likely to be on higher ground to the east. The significance of evidence from this period, subject to the disturbance during the modern period due to agricultural activity is, therefore, also, likely to be local.

5.3.4 The historic period has slightly greater potential for survival. During the Roman period the uncertainty surrounding the extent of deposits found to the east hints at the possibility that the enclosed agricultural landscape of this period might extend to the west. Whilst the remains may be eroded by later, modern activity, this period may yield some evidence of local interest.

5.3.5 The medieval period is characterised by limited evidence largely related to the development of agriculture. Agricultural activity across the site is assumed from the early descriptions of the parish and Post-medieval map evidence. It is likely that this area was initially arable land, possible cleared progressively (assarting) from the early Saxon period; later it is likely that it was pasture as the demand for woolen textiles increased. In the 19th century, following enclosure, the land was almost certainly arable and this was the case throughout the 20th century. The potential for other than agricultural evidence at the site in the medieval period is low whilst the significance of that archaeology would be local at most. The agricultural regime of the 19th and 20th century suggests that any medieval evidence will be truncated and will not be significant.

5.3.6 The modern period has seen the transformation of the proposed development site from small fields and, based on current evidence, there is no potential for the proposed development site to contain significant modern period archaeology.
5.3.7 If further Prehistoric and later features do survive they are likely to be truncated, but would have slight potential to contribute to the wider regional research objectives identified by Medleycott 2011.

The proposed development site in 2016 looking south-westwards towards from Greenfield Road.

Aerial photograph of the proposed development site in 2006 (©GoogleEarth)
Dereham (Cherry Lane) Windmill in its contemporary setting (January 2016)
6 SITE CONDITIONS AND THE PROPOSED DEVELOPMENT

6.1 Site Conditions

6.1.1 Site inspection in January 2016 recorded the condition of the proposed development area. (See above). In brief it comprises a former agricultural landscape of ploughed arable land crossed by former, temporary, access tracks.

The proposed master plan area

6.2 The Proposed Development: Residential

6.2.1 The proposed development is residential use with areas of landscaping.

6.2.2 The nature of the proposed development is such that it must be assumed construction and landscaping will occur within the entire area of the development and that this will remove any archaeological deposits.
7 IMPACT ASSESSMENT

7.1.1 Introduction:

7.1.2 In general the base line data indicates that the site has low potential to contain archaeological evidence and that a swathe across the centre of the site has already been the subject of earlier development. The LIDAR data (see Appendix 2) and aerial photograph (Fig 5) also gives a clear indication of the extent of the landscape changes in these areas.

7.1.3 Walkover survey, map and topographical evidence gathered to determine the visual and perceptual impact of the proposed development suggests a zone of potential impact is limited to some 100m. It is constrained by the largely flat topography, housing, trunk road embankment and existing hedged land boundaries.

7.1.4 These two factors and the detailed Masterplan of the proposed development provide the basis for the following assessment of impact.

7.2 The Significance of the Evidence and Policy – Direct Impacts on Below Ground Archaeology

7.2.1 The NPPF in section 12 Conserving and Enhancing the Historic Environment, employs the concept of significance as the basis for assessing impact on the historic environment and historic assets; paragraph 135 notes that ‘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 affect directly or indirectly non-designated heritage assets, a balanced judgment will be required having regard to the scale of harm or loss and the significance of the heritage asset’.

7.2.2 Heritage Assets

7.2.3 The proposed developments at Greenfield Road, will take place in an agricultural field location which has seen some development activity (access route to late 20th century development). The land is presently grassland with some ploughed areas. The desk-based survey and site conditions indicate that there is low potential for archaeology of all periods, but should deposits be found they would be of probably local significance. In this area there is only low potential for development to affect below ground archaeology.
7.2.4 Mitigation

7.2.5 Mitigation of the effects of development can take several forms and NPPF, para 131, notes that when determining planning application, local planning authorities should take account of the ‘the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation’.

7.2.6 At Dereham the scale of the areas affected by residential development and the nature of the ground, together with the anticipated nature of the archaeological resource, suggests any surviving archaeology will be disturbed and of local character. An appropriate mitigation strategy, in light of the potential significance of the archaeological resource, which would sustain and enhance understanding of the heritage assets at risk, is a programme of observation, recording, reporting and archiving. This programme could be secured by planning consent condition.

7.2.7 Impact Assessment on Below Ground Archaeology

7.2.8 The proposed development falls within that group of development sites where there is no evident potential for significant surviving archaeological evidence. The impact of development, therefore, is potentially on locally significant deposits. By following this programme the impact of development on the historic environment will be neutral (no harm) for the purposes of the NPPF.

7.3 The Significance of the Evidence and Policy – Impacts on the Setting and Significance of Heritage Assets.

7.3.1 The policy and methodological context of development has been outlined in detail in sections 2 and 3 (above). The following sections details those assets which have the potential to be harmed by the presence of the development either by the visual presence of new structures within the setting of heritage assets or due to the perception that the development has so changed the setting of a heritage assets that its significance itself has changed.

7.3.2 Heritage Assets

7.3.3 As noted above, the proposed development at Greenfield Road, will take place in a green field location which has seen residential development in the surrounding area from the later 20th century. The site itself is presently grassland with some ploughed areas and the visual impact of the proposed development has been assessed as limited...
to some 100m. Within this area there is only one significant heritage asset: the Dereham or Cherry Lane windmill (Grade II). The assessment below follows the staged approach recommended by Historic England, establishing the significance of the windmill, its setting, assessing the importance of the setting to the windmill and the nature of the impact of development on its significance.

7.3.4 Dereham Windmill (Grade II)

7.3.5 **Significance:** Dereham Mill, also known as Norwich Road or Cherry Lane Mill is a five-storey tower mill with a boat shaped cap winded by a *fantail*. The mill had four *double Patent sails*. The tower is 42 feet (12.80m) to the curb. The lower section of the *upright shaft* remains, with a 9 feet (2.74m) diameter cast iron *great spur wheel* with wooden *cogs*. The *crown wheel*, which received the drive from the engine, is of wood.

7.3.6 East Dereham tower mill was built in 1836 by Michael Hardy, a miller & baker and James Hardy, a millwright. The mill was shown on the O.S. map of 1838 as standing on Cherry Drift, later to become Cherry Lane, just off the Norwich Road. The mill was almost certainly built to take advantage of the agricultural conditions of the early 19th century following the 1815 enactment of the Corn Laws which protected cereal grain producers in Britain against foreign competition. The 42ft, five storey red brick tower was 24ft in diameter at the base and topped with a Norfolk boat shaped cap and a 6 bladed fantail. The two pairs of patent sails on an iron wind shaft drove 2 pairs of stones, a flour mill and jumper. The tower’s external wall was constructed of Flemish bond brickwork, while the inside was of English bond rendered with plaster. The outer brick face appeared to be only half a brick in thickness and was not bonded properly to the interior of the wall. The wall at the base of the tower was 2ft 6in thick and a cambered arch was above each of the windows and doors. Carved on the bridge beam above the southwest pair of stones was the inscription: *E. SAUL 22 SEPTR 46*.

7.3.7 In 1844 the mill was sold to William Fendick and the business was carried on after his death, by Fendick's widow Sarah until 1871 when their son William took over. A steam engine was installed as auxiliary power and William worked the mill until his death in 1904. Although inherited by his son it was sold in 1909 to Charles Robert Gray and Arthur James Milk. Gray died in 1922 and the sails were removed about this time and the steam engine was replaced by a paraffin engine. Milk died in 1926 and the firm was carried on by William Robert Gray, Arthur Payne Milk and Henry Jonas Harding Garlick trading as Robert Gray Ltd. The mill was worked by engine until 1937. The mill, now disused was sold to Greens Nurseries.13

7.3.8 The windmill was listed grade II on 1st August 1972 and briefly described at that time as: "*Probably 19th century, early multi-storey circular tower mill. Windows, missing,*
7.3.9 Since that time the windmill has been extensively restored and the history of that restoration published by Wikipedia. After the Second World War Green's Nurseries applied to convert the mill to residential use but this was refused and a repair notice was served in November 1974. In December 1977, the remains of the cap and the windshaft were removed by Lennard & Lawn (Millwrights) Ltd and the mill was sold in 1978 to Breckland District Council for £1. The brickwork, floors, windows and doors were repaired in spring 1979 by a scheme supported by the Manpower Services Commission and in July 1979, Breckland District Council approved further restoration work to complete the first phase of the restoration.

7.3.10 In March 1983, permission was granted to the Girl Guides and Toc H to use the mill as a meeting room on a weekly basis during the summer months, but by January 1984, the mill had been vandalised and in December 1984, Breckland District Council approved repair work to the mill as a landmark and agreed to investigate the possibility of installing an electricity and water supply. The work was undertaken by John Lawn and the mill was formally opened to the public on 14 September 1987.

7.3.11 In 2002, the mill was taken over by Dereham Town Council and in July 2003, the Friends of Dereham Mill applied unsuccessfully for a National Lottery Awards for All grant to fund a comprehensive survey. On 13 January 2004, the mill lost half a sail in a gale. In November 2007, planning permission was granted for a visitor centre to be built at the mill. It was reported that a Heritage Lottery Fund grant was being sought to enable the restoration of the mill to working order. However, the application for lottery funds was turned down and a new group of Trustees formed in 2011. They were successful in gaining funding to restore and reopen Dereham Windmill as a Community Exhibition Centre. It reopened in September 2013 with monthly exhibitions from local schools and community groups.

7.3.12 Today the windmill is run by the Trustees and Friends of Dereham Windmill. It was formally opened to the public as a community exhibition centre and on the 20th June 2015, the Community Hall and Coffee Shop was opened.

7.3.13 The windmill was described by Pevsner and Wilson (Pevsner 2002, 295).

7.3.14 Setting: The windmill is located on the northern part of a small green, formerly agricultural land, sub-divided into a long rectangular closes (see OS for the 19th century) and in the 19th century largely arable land. Today the green also provides the location of car parking and is the site of the Community Hall and Coffee Shop.
north of the mill lie the Cherry Lane allotments of Dereham Town Council, and to the east and west, beyond the green, 20\textsuperscript{th} century housing. The proposed development site lies to the south of the green and will occupy the former agricultural field now bounded by the A47 to the south and a small part of a field to the east. The wider setting comprises the eastern suburbs of East Dereham as they extend along the Norwich Road.

![Dereham (Cherry Lane) Windmill in its contemporary setting with car parking in the foreground and Community Hall to the right (January 2016). Looking north west from Greenfield Road.](image)

7.3.15 **Significance and Setting:** The green provides excellent views of the windmill and its sails provide a distinctive landmark. Views from within the housing development to the west are constrained to glimpses between buildings as are views from within the housing estate to the east. From the allotments views are limited by the hedgerow along Hall Lane which forms the southern boundary. The setting has clearly changed from its original arable hinterland when the mill was built to take advantage of the agricultural conditions of the early 19\textsuperscript{th} century.

7.3.16 The setting today reminds viewers of the origins of the mill, but much of its significance lies in its survival and as an example of what Ling has described as ‘not just a building but a massive and intricate piece of specialised machinery’ (Ling 2015, 6). Moreover the significance of the windmill in heritage terms has changed from its original role to that of a museum exhibit and community center. It has been monumentalised and recreated as a community asset for leisure rather than food production.

7.3.17 **Impact Assessment:** The visibility of the mill from the surrounding allotments and existing housing will not be affected by the proposed development. Views from the proposed development site itself will be reduced to glimpses between buildings. The principal view from the south now afforded by the Hall Lane bridge over the A47 will be somewhat constrained but a green space has been proposed which will maintain the view over the field and between the houses of the proposed development. The impact of

\[14 \text{https://en.wikipedia.org/wiki/East_Dereham_Windmill accessed 17/2/16}\]
further housing on the significance of the mill will not affect its principal interest as a relic of the 19th century, nor challenge understanding of its former function. The presence of the development immediately adjacent to the existing housing will be almost imperceptible from ground level beyond the green spaces represented by the allotments and within the existing housing.

7.3.18 However the scale of the housing will inevitably increase the sense of suburban encroachment on the windmill and erode its former farmland setting. The change to the setting, which will be beyond the green in which the mill is located will not substantially affect perceptions of its workings or method of work, and will not affect perceptions or understanding of its historic development. There will, however, be a modest effect on the views from what is presently farmland. These effects must considered in the light of existing development, including the A47, and the undiminished enthusiasm of the Friends groups for refurbishment and use of the mill as a community centre, the latter potentially enhanced by the increased local population.

7.3.19 Mitigation

7.3.20 Mitigation of the effects of development has been developed as part of the design iteration. A green corridor has been created to maintain views of the windmill from the south from the Hall Lane bridge. Mitigation can take several forms and NPPF, para 131, notes that when determining planning application, local planning authorities should take account of the ‘the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation’.

7.3.21 Impact Assessment on the Significance of Heritage Assets due to Development within their Settings

7.3.22 At Dereham the scale of the areas affected by residential development and the nature of the ground, together with the anticipated nature of the impact, suggests that the harm to the significance of the Dereham windmill will be modest to slight (see Appendix 4, Table 5).
8.0 SUMMARY AND CONCLUSIONS

8.1 Summary

8.1.1 This report has assessed the potential impact of the proposed development on below ground archaeology and on the setting and significance of heritage assets at Greenfield Road, East Dereham. The assessment has been based on documentary and map search and a site inspection in January 2016, which recorded the current condition of the proposed development site and surrounding heritage assets.

8.1.2 The surrounding landscape, east of East Dereham, includes heritage assets of national importance, dating, principally, from the Modern period. This reflects the changing nature of the historic landscape which has evolved from prehistoric forest through a later prehistoric period of, probably, arable farming to a period of re-forestation, pasture and more recently, arable agricultural and modern residential development. The proposed development site, however, contains no recognized evidence of archaeologically significant activity and landscape trends suggest only low potential for remains of Roman period date. These, if present, would be of local significance.

8.2 Conclusion

8.2.1 The absence of archaeological evidence from the proposed development site has been noted, as has the low potential for archaeology of significance to be present. In this circumstance a mitigation strategy is proposed to ensure that the development enhances the historic environment. This comprises Observation, Recording, Reporting and Archiving during development. This programme of works, secured by planning condition, will ensure that any archaeological evidence below ground will be recorded, should it be found, and that the impact of development will be no harm for the purposes of the NPPF.

8.2.2 The effect of development on the setting and significance of heritage assets within a zone of theoretical impact has also been assessed and mitigation of the visual effects of development designed as part of the proposed scheme. This comprises a green corridor created to maintain views of the windmill from the south from the Hall Lane bridge over the A47.

8.2.3 At Dereham the scale of the areas affected by residential development and the nature of the ground, together with the anticipated nature of the impact, suggests that the harm to the significance of the Dereham windmill will be modest to slight (see Appendix 4, Table 5).
9.0 SOURCES CONSULTED

Austen L 1997 Palaeolithic and Mesolithic, 5-10 in Glazebrook (ed) 1997


British Regional Geology, 1964 East Anglia and Adjoining Areas, HMSO


Cook M 1984 Looking Back at Dereham, Dereham:Nostalgia


Glazebrook J 1997 Research and archaeology: A framework for the Eastern Counties 1 Resource Assessment, EAA Occ Papers 3

Going C 1997 'Roman', in Glazebrook J (ed) 1997 35-43

Ling J 2015 Windmills of Norfolk, Gloucester:Amberley

Medleycott M 2011 Research and Archaeology: A Revised Framework for the Eastern Counties, EAA 24

Norton B 1990 The Story of East Dereham, Chichester:Phillimore


Wade K 1997 Anglo-Saxon and Medieval Rural, in Glazebrook J, (ed) 47-55
Williamson T 2006 *England’s Landscape East Anglia*, London: Collins


**General**

Norfolk Historic Environment Record (LHER)

Parish collection based on village of East Dereham in Norfolk Archives

Historic Maps, in particular OS Series from the 1883/1889 1st edition onwards.

**Archive and Documentary**

East Dereham Tithe Award and Map 1839 (NRO: DN/TA 267)
Enclosure Act (Map and Awards) 1810/15 C/SCA2 87A & 87
Faden W 1797 Map of Norfolk (NRO Local Hist)
Bryant A 1826 Map of Norfolk, (NRO published by Barringer J C 1999 Larks Press Dereham)

**General**

Norfolk Historic Environment Record (HER)

Historic Maps, in particular OS 1:2500 Series from the 1883 1st edition onwards.
Figure 1: Land at Greenfield Road

Site location
Fig 2
Proposed Development Site based on Faden's Map of Norfolk 1797
Fig 3
Proposed Development Site based on the Inclosure Award 1815

Not to scale
Illustrative only
Fig 4
Proposed Development Site based on the Tithe Award 1839

Not to scale
Illustrative only
APPENDIX 1

HER Baseline Data
**ARCHAEOLOGY DESK BASED ASSESSMENT**  
**Land at Greenfield Road, Dereham**  

**SOURCES OF INFORMATION**

**NORFOLK HISTORIC ENVIRONMENT RECORD (HER)**

Heritage data within 750m of the proposed development site:

<table>
<thead>
<tr>
<th>Norfolk HER</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>1024</td>
<td>Avenue House, South Green (site of)</td>
</tr>
<tr>
<td>2843</td>
<td>Possible Bronze Age hearth</td>
</tr>
<tr>
<td>2844</td>
<td>Possible bronze Age hearth</td>
</tr>
<tr>
<td>10832</td>
<td>Prehistoric pit or hearth</td>
</tr>
<tr>
<td>12003</td>
<td>Dereham Windmill 1836*</td>
</tr>
<tr>
<td>12696</td>
<td>Post-Medieval brickworks</td>
</tr>
<tr>
<td>13588</td>
<td>Route of Wymondham to Wells Railway</td>
</tr>
<tr>
<td>13600</td>
<td>Route of Lynn and Dereham Railway</td>
</tr>
<tr>
<td>13776</td>
<td>19th century seat, wrought iron &amp; wood</td>
</tr>
<tr>
<td>13794</td>
<td>19th century maltings</td>
</tr>
<tr>
<td>13795</td>
<td>19th century leather factory &amp; later soap works</td>
</tr>
<tr>
<td>15179</td>
<td>Prehistoric burnt flint</td>
</tr>
<tr>
<td>15923</td>
<td>Post medieval workhouse - demolished</td>
</tr>
<tr>
<td>19012</td>
<td>Undated linear feature</td>
</tr>
<tr>
<td>19014</td>
<td>Roman pottery scatter</td>
</tr>
<tr>
<td>19306</td>
<td>Prehistoric flint, Iron Age, Roman, late Saxon &amp; medieval pottery (from field walking)</td>
</tr>
<tr>
<td>24990</td>
<td>Prehistoric flint including Neolithic scraper</td>
</tr>
<tr>
<td>25485</td>
<td>Palaeolithic flake &amp; Neolithic scraper</td>
</tr>
<tr>
<td>25593</td>
<td>Late Saxon, Medieval and post medieval artefacts - Metal detecting</td>
</tr>
<tr>
<td>25594</td>
<td>Medieval material – from metal detecting</td>
</tr>
<tr>
<td>28302</td>
<td>Mesolithic and Neolithic flint, incl Neolithic axe and Roman ceramics (Samian) from metal detecting and field walking</td>
</tr>
<tr>
<td>28321</td>
<td>Neolithic, medieval and Post med finds (metal detecting)</td>
</tr>
<tr>
<td>30949</td>
<td>Late Saxon strap end</td>
</tr>
<tr>
<td>32832</td>
<td>Multi period finds – Neolithic, Bronze Age, Medieval and Post-Medieval pottery</td>
</tr>
<tr>
<td>34295</td>
<td>16th-17th century brass harness fitting</td>
</tr>
<tr>
<td>34739</td>
<td>Old Jolly Farmers, Toftwood*</td>
</tr>
<tr>
<td>35711</td>
<td>Post medieval brick kiln</td>
</tr>
<tr>
<td>37542</td>
<td>Post medieval material from metal detecting</td>
</tr>
<tr>
<td>37541</td>
<td>Multi-period finds Roman to Post medieval</td>
</tr>
<tr>
<td>41376</td>
<td>Site of Norwich Road Chapel</td>
</tr>
<tr>
<td>46177</td>
<td>Borrow House, Dumpling Green</td>
</tr>
<tr>
<td>54764</td>
<td>Modern field drains</td>
</tr>
<tr>
<td>55624</td>
<td>Air Ministry sidings</td>
</tr>
<tr>
<td>58091</td>
<td>Early Bronze Age pit and Post med field boundaries</td>
</tr>
</tbody>
</table>

* Listed Buildings
APPENDIX 2

LIDAR Data
LiDAR Data Plot

Data Type: DSM
Resolution: 1m

Site Boundary

Direction of Illumination

Contains public sector information licenced under the Open Government Licence v3.0
APPENDIX 3

OS Map Data (Envirocheck)
Norfolk
Published 1884
Source map scale - 1:10,560

The historical maps shown were reproduced from maps predominantly held at the scales adopted for England, Wales and Scotland in the 1840's. In 1854 the 1:2,500 scale was adopted for mapping urban areas; these maps were used to update the 1:10,560 maps. The published date given therefore is often some years later than the surveyed date. Before 1935, all OS maps were based on the Cassini Projection, with independent surveys of a single county or group of counties, giving rise to significant inaccuracies in outlying areas. In the late 1940's, a Provisional Edition was produced, which updated the 1:10,560 mapping from a number of sources. The maps appear unfinished - with all military camps and other strategic sites removed. These maps were initially overprinted with the National Grid. In 1970, the first 1:10,000 maps were produced using the Transverse Mercator Projection. The revision process continued until recently, with new editions appearing every 10 years or so for urban areas.

Map Name(s) and Date(s)

Order Details
Order Number: 34239689_1_1
Customer Ref: D137293
National Grid Reference: 600390, 312820
Slice: A
Site Area (Ha): 12.76
Search Buffer (m): 1000

Site Details
56, Greenfields Road, Dereham, NR20 3TE
Historical Map - Slice A

Norfolk
Published 1907
Source map scale - 1:10,560
The historical maps shown were reproduced from maps predominately held at the scale adapted for England, Wales and Scotland in the 1840’s. In 1854 the 1:2,500 scale was adopted for mapping urban areas, these maps were used to update the 1:10,560 maps. The published date given therefore is often some years later than the surveyed date. Before 1938, all OS maps were based on the Cassini Projection, with independent surveys of a single county or group of counties, giving rise to significant inaccuracies in outlying areas. In the late 1840’s, a Provisional Edition was produced, which updated the 1:10,560 mapping from a number of sources. These maps were initially overprinted with the National Grid. In 1970, the first 1:10,000 maps were produced using the Transverse Mercator Projection. The revision process continued until recently, with new editions appearing every 10 years or so for urban areas.

Order Details
Order Number: 34239689_1_1
Customer Ref: D137293
National Grid Reference: 600390, 312820
Slice: A
Site Area (Ha): 12.76
Search Buffer (m): 1000

Site Details
56, Greenfields Road, Dereham, NR20 3TE

Map Name(s) and Date(s)
Norfolk
Published 1929
Source map scale - 1:10,560
The historical maps shown were reproduced from maps predominately held at the scale adopted for England, Wales and Scotland in the 1840's. In 1854 the 1:2,500 scale was adopted for mapping urban areas; these maps were used to update the 1:10,560 maps. The published date given therefore is often some years later than the surveyed date. Before 1939, all OS maps were based on the Cassini Projection, with independent surveys of a single county or group of counties, giving rise to significant inaccuracies in outlying areas. In the late 1940's, a Provisional Edition was produced, which updated the 1:10,560 mapping from a number of sources. The maps appear unfinished - with all military camps and other strategic sites removed. These maps were initially overprinted with the National Grid. In 1970, the first 1:10,000 maps were produced using the Transverse Mercator Projection. The revision process continued until recently, with new editions appearing every 10 years or so for urban areas.
The historical maps shown were reproduced from maps predominately held at the scale adopted for England and Wales and Scotland in the 1840s. In 1854 the 1:2,500 scale was adopted for mapping urban areas; these maps were used to update the 1:10,560 maps. The published date given therefore is often some years later than the surveyed date. Before 1938, all OS maps were based on the Cassini Projection, with independent surveys of a single county or group of counties, giving rise to significant inaccuracies in outlying areas. In the late 1840s, a Provisional Edition was produced, which updated the 1:10,560 mapping from a number of sources. The maps appear unfinished - with all military camps and other strategic sites removed. These maps were initially overprinted with the National Grid. In 1970, the first 1:50,000 maps were produced using the Transverse Mercator Projection. The revision process continued until recently, with new editions appearing every 10 years or so for urban areas.
Norfolk
Published 1952
Source map scale - 1:10,560

The historical maps shown were reproduced from maps predominantly held at the scale adopted for England, Wales and Scotland in the 1840’s. In 1854 the 1:2,500 scale was adopted for mapping urban areas, these maps were used to update the 1:10,560 maps. The published date given therefore is often some years later than the surveyed date. Before 1918, all OS maps were based on the Cassini Projection, with independent surveys of a single county or group of counties, giving rise to significant inaccuracies in outlying areas. In the late 1940’s, a Provisional Edition was produced, which updated the 1:10,560 mapping from a number of sources. The maps appear unfinished - with all military camps and other strategic sites removed. These maps were initially overprinted with the National Grid. In 1970, the first 1:10,000 maps were produced using the Transverse Mercator Projection. The revision process continued until recently, with new editions appearing every 10 years or so for urban areas.

Map Name(s) and Date(s)

Order Details
Order Number: 34239688_1_1
Customer Ref: D137293
National Grid Reference: 600390, 312820
Slice: A
Site Area (Ha): 12.76
Search Buffer (m): 1000

Site Details
56, Greenfields Road, Dereham, NR20 3TE

Historical Map - Slice A
APPENDIX 4

Impact on Setting Methodology
IMPACT ON SETTING - METHODOLOGY

Impact on Setting

Historic England has recently published guidance concerning the assessment of effects on the setting of heritage assets (Historic Environment Good Practice Advice in Planning Note 3 The Setting of Heritage Assets, April 2015). This guidance proposes a five stage programme of assessment: (1) identifying the assets affected and their setting, (2) assessing the contribution setting makes to significance, (3) assessing the effect of the proposed development, (4) Assessing the effect of the proposed development on the significance of the asset(s), (5) monitoring the decision and outcomes. The methodology adopted for the purposes of this assessment, which is set out below, is based upon the first four stages of this process.

The methodology adopted for the purposes of this assessment consists of a staged process, as follows:

- **Step 1:** The baseline heritage assets located within the study area whose setting is likely to be affected by the development are identified and their heritage significance described as required by NPPF.

- **Step 2:** The setting of each heritage asset forming part of the baseline is identified and described. The contribution which setting makes to the heritage significance of the asset is then determined.

- **Step 3:** The magnitude of the impact on the heritage significance of each heritage asset is identified. This is a measure of the degree to which the heritage significance of the asset will be increased or diminished by the proposed development. Where the only potential impact is on the setting of the heritage asset, only that part of the heritage significance derived from its setting can be affected. The assessment of magnitude of impact must, therefore, be weighted proportionately. Regard is had at this stage to the following checklist of development attributes (taken from English Heritage guidance ‘The Setting of Heritage Assets, 2011’):
Archaeology Desk Based Assessment
Land at Greenfield Road, Dereham

<table>
<thead>
<tr>
<th><strong>Location and siting of development</strong></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Proximity to asset</td>
<td></td>
</tr>
<tr>
<td>Extent</td>
<td></td>
</tr>
<tr>
<td>Position in relation to landform</td>
<td></td>
</tr>
<tr>
<td>Degree to which location will physically or visually isolate asset</td>
<td></td>
</tr>
<tr>
<td>Position in relation to key views</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>The form and appearance of the development</strong></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Prominence, dominance, or conspicuousness</td>
<td></td>
</tr>
<tr>
<td>Competition with or distraction from the asset</td>
<td></td>
</tr>
<tr>
<td>Dimensions, scale and massing</td>
<td></td>
</tr>
<tr>
<td>Proportions</td>
<td></td>
</tr>
<tr>
<td>Visual permeability (extent to which it can be seen through)</td>
<td></td>
</tr>
<tr>
<td>Materials (texture, colour, reflectiveness, etc)</td>
<td></td>
</tr>
<tr>
<td>Architectural style or design</td>
<td></td>
</tr>
<tr>
<td>Introduction of movement or activity</td>
<td></td>
</tr>
<tr>
<td>Diurnal or seasonal change</td>
<td></td>
</tr>
</tbody>
</table>

| **Other effects of the development**          |                                                                 |
| Change to built surroundings and spaces       |                                                                 |
| Change to skyline                             |                                                                 |
| Noise, odour, vibration, dust, etc            |                                                                 |
| Lighting effects and ‘light spill’            |                                                                 |
| Change to general character (eg Suburbanising or industrialising) |                                                                 |
| Changes to public access, use or amenity      |                                                                 |
| Changes to land use, land cover, tree cover   |                                                                 |
| Changes to archaeological context, soil chemistry, or hydrology |                                                                 |
| Changes to communications/accessibility/permeability |                                                                 |

| **Permanence of the development**            |                                                                 |
| Anticipated lifetime/temporariness           |                                                                 |
| Recurrence                                   |                                                                 |
| Reversibility                                |                                                                 |

| **Longer term or consequential effects of the development** |                                                                 |
| Changes to ownership arrangements            |                                                                 |
| Economic and social viability                |                                                                 |
| Communal use and social viability            |                                                                 |

*Table 1 Criteria for measuring change in the setting which may imply change in the significance of an Historic Asset (Based on ‘The Setting of Heritage Assets’ English Heritage 2011a)*
Table 2 Criteria for establishing the magnitude of impact brought about by development on heritage assets.

- **Step 4**: Having identified the magnitude of impact, the sensitivity of an asset to impacts on its heritage significance is considered by reference to the **heritage importance** of the asset and the policy protection it is afforded in statute or policy. The criteria used to signify the level of heritage importance assigned to each of the assets included within this assessment are set out in Table 3 below.

Table 3 Criteria for assessing the heritage importance of assets.
<table>
<thead>
<tr>
<th>Substantial Adverse</th>
<th>Moderate Adverse</th>
<th>Slight Adverse</th>
<th>Negligible</th>
<th>Neutral</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>High</strong></td>
<td>Substantial harm/High</td>
<td>Less than substantial harm/Moderate</td>
<td>Less than Substantial Harm/Moderate</td>
<td>Less than Substantial Harm/Slight</td>
</tr>
<tr>
<td><strong>Medium</strong></td>
<td>Less than substantial harm/Moderate</td>
<td>Less than substantial harm/Moderate</td>
<td>Less than substantial harm/Slight</td>
<td>No Harm/Insignificant</td>
</tr>
<tr>
<td><strong>Low</strong></td>
<td>Less than substantial harm/Moderate</td>
<td>Less than substantial harm/Slight</td>
<td>Less than substantial harm/Slight</td>
<td>No Harm/Insignificant</td>
</tr>
</tbody>
</table>

Table 4 The significance and magnitude of impact matrix which is used in Stage 4 to help portray the assessment of impact in terms of ‘harm’ as employed in NPPF where only ‘substantial harm’ is defined.\(^\text{15}\)

The matrix in Table 4 provides a mechanism which illustrates a series of gradations between the ‘substantial harm’ of the NPPF and less than substantial harm, calibrated against the significance of the heritage asset. Table 5 provides a descriptive guide to the levels of harm from substantial harm through less than substantial to no harm.

\(^{15}\) Substantial harm is equated to ‘total loss of significance of a designated heritage asset’ (NPPF para 133)
### Table 5: Criteria for correlating significance of impact to National Planning Policy

<table>
<thead>
<tr>
<th>Significance of impact</th>
<th>Degree of harm and relationship to NPPF heritage policy</th>
</tr>
</thead>
</table>
| High                   | - Substantial harm to the significance of a designated heritage asset such that there was a “total loss of significance of a designated heritage asset”.  
- Substantial harm to the significance of a non-designated heritage asset of comparable significance to a designated asset, such that there would be a “total loss of significance to the heritage asset”.  
- Development scheme would require wholly exceptional benefits, or meet the criteria in paragraph 133 of the NPPF. |
| Moderate               | - Less than substantial harm to the significance of a designated heritage asset,  
- Requires substantive development scheme benefits.  
- High impact to a non-designated heritage asset of medium sensitivity/significance.  
- Would require a balanced judgement with substantive development scheme benefits. |
| Modest                 | - Less than substantial harm where there is low impact to the significance of a designated heritage asset  
- Would require a balanced judgement with moderate development scheme benefits.  
- Medium impact to a non-designated heritage asset of medium sensitivity/significance.  
- Would require a balanced judgement with moderate development scheme benefits. |
| Slight                 | - Less than substantial harm to the significance of a designated heritage asset,  
- Requiring only small benefits due to the small degree of harm.  
- Substantial or moderate adverse impact to a non-designated heritage asset of low sensitivity/significance.  
- Would require a balanced judgement with relatively small development scheme benefits. |
| Insignificant          | - Very low degree of harm, requiring little action or no action to secure heritage interest of the affected heritage assets. |