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# Cavenham Quarry Suffolk

## Proposed Soils Washing Plant



## Cultural Heritage Assessment December 2023

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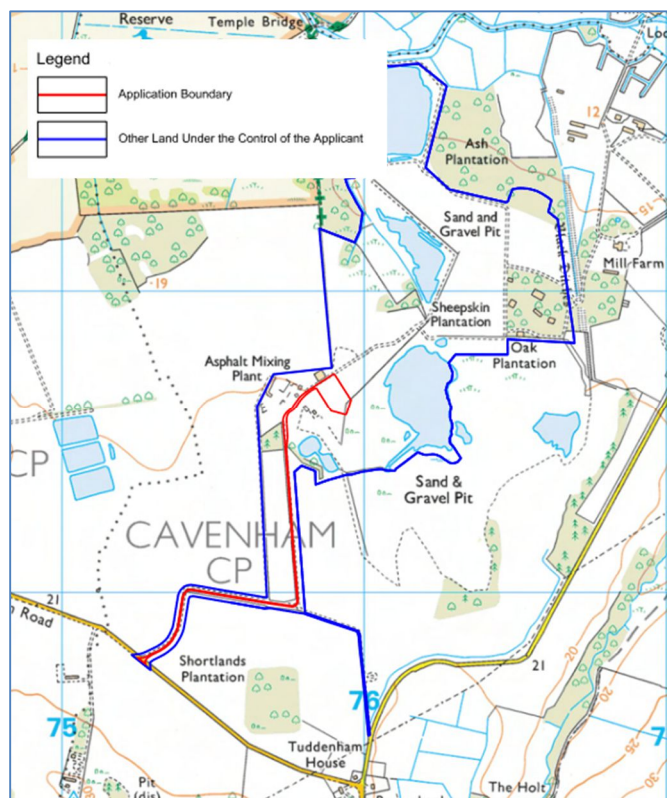
Cover photograph: The proposed development area, March 2023

# 1. Introduction

## 1.1 SCOPE OF THIS REPORT

### 1.1.1 Description of the proposed development

This report, commissioned by PDE Consulting on behalf of Allen Newport Ltd, presents the findings of a cultural heritage assessment for the proposed construction of a soils washing plant at Marston's Pit Quarry, Cavenham, Suffolk (**Figure 1**).



**Figure 1 Location of Proposed Development Area**

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The proposal is for the installation and use of a washing plant for the recycling of inert materials together with associated access onto the highway. The working scheme is shown and described in detail elsewhere in the Planning Statement. The proposed site layout is shown on **Figure 2** and elevations on **Figure 3**.

The planning application (red line) boundary is wholly within the existing recycling area that has already been disturbed and from an archaeological perspective retains no potential having been historically worked, and as can be seen on the cover photograph of this report. This report therefore concentrates on the setting of designated heritage assets.

The Proposed Development Area (PDA) is centred at TL 75958 71712 and covers an area of 0.84ha (excluding the access road) and with the existing access road the area extends to approximately 1.92 ha.

The PDA lies approximately 1.7 kilometre (km) to the north of the village of Cavenham and 2km east of Tuddenham.

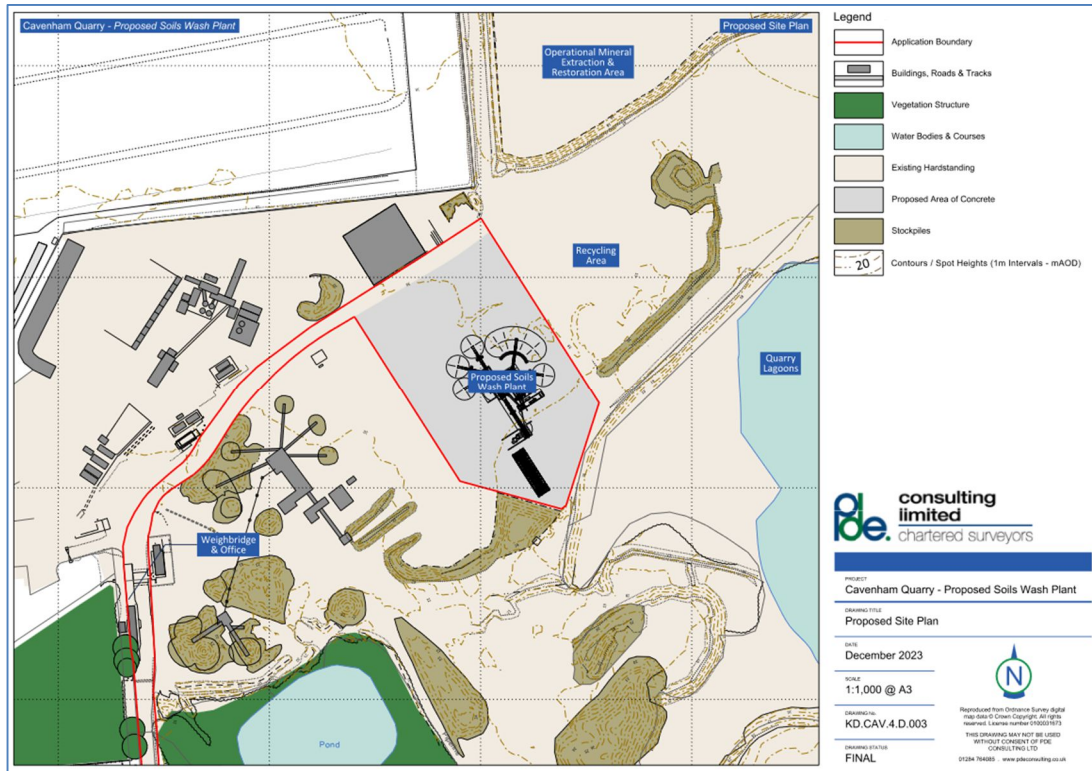


Figure 2 Proposed Site Layout

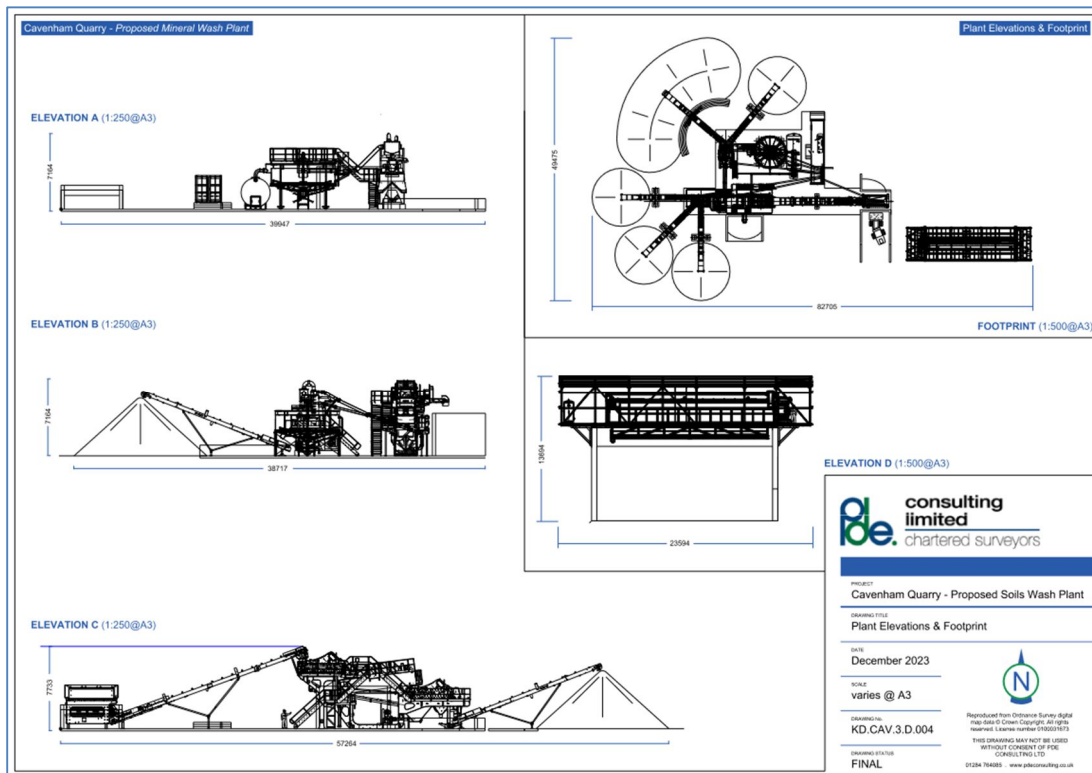


Figure 3 Proposed Elevations

### ***1.1.2 Scope of cultural heritage***

Cultural heritage is represented by a wide range of features that result from past human use of the landscape. These include historic structures, many still in use, above ground and buried archaeological monuments and remains of all periods, artefacts of anthropological origin and evidence that can help reconstruct past human environments. In its broadest form cultural heritage is represented by the landscape and townscape itself.

As noted above The PDA has previously been disturbed to some depth and there is no near surface archaeological potential. This Assessment therefore focuses upon the setting of designated heritage assets in relation to the proposed development.

Indirect effects can occur as a result of significant changes to the setting of a landscape or asset, whether permanent or temporary. This is particularly relevant to designated cultural heritage assets such as World Heritage Sites, Scheduled Monuments, Listed Buildings, Conservation Areas, Registered Parks and Gardens, and Battlefields.

## **1.2 RESEARCH**

In order to assess the effects of the proposed scheme, cultural heritage information within and up to 1km from the boundary of the PDA was examined.

A variety of sources were consulted including the Suffolk Historic Environment Record, DEFRA Magic and the Historic England Archive.

All work has been undertaken in accordance with *Standard and Guidance for Archaeological Desk-Based Assessment* (Chartered Institute for Archaeologists 2008, revised 2012).

## **1.3 RELEVANT LEGISLATION, POLICY AND GUIDANCE**

The importance of archaeology and cultural heritage is clearly recognised at both national and local levels. Certain features that are deemed to be of particular importance are given legal protection through the *Ancient Monuments and Archaeological Areas Act 1979* (Scheduled Monuments) and The Planning (Listed Buildings and Conservation Areas) Act 1990.

### ***1.3.1 Policy and Guidance***

The significance of any effects – both direct and indirect - should be identified as part of a cultural heritage assessment. This is achieved using a combination of the following published guidance and professional judgement.

- *National Planning Policy Framework* updated 2023. Department for Communities and Local Government.
- Planning Practice Guidance (PPG) *Conserving and Enhancing the Historic Environment* updated 2019
- Historic England 2017 *Good Practice Advice 3 – The Setting of Heritage Assets*, 2<sup>nd</sup> edition
- Historic England 2009. *Planning Mitigation and Archaeological Conservation – Resource Assessment*.
- Historic England 2019. *Statements of Heritage Significance (HEAN12)*

### **1.3.2 National Planning Policy Framework**

National planning policy on how cultural heritage should be assessed is given in the National Planning Policy Framework (NPPF), revised in 2023. This covers all aspects of heritage and the historic environment, including listed buildings, conservation areas, registered parks and gardens, battlefields and archaeology.

Significance (for heritage policy) is described at Annex 2 of the NPPF as:

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

Setting is defined within the NPPF as:

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

The most relevant policies within NPPF to this proposal are reproduced below,

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

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

#### **Considering potential impacts**

*199. When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.*

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

*a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;*

*b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II\* listed buildings, grade I and II\* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.<sup>1</sup>*

*201. Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:*

*a) the nature of the heritage asset prevents all reasonable uses of the site; and*

*b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and*

*c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and*

*d) the harm or loss is outweighed by the benefit of bringing the site back into use.*

*202. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.*

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

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

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

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

Planning Practice Guidance (PPG) Conserving and Enhancing the Historic Environment was published in April 2014 (updated in 2019) as a companion to the NPPF, replacing previous Circulars and other supplementary guidance. In respect of heritage decision-making, the PPG stresses the importance of determining applications on the basis of significance, and explains how the tests of harm and impact within the NPPF are to be interpreted.

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

*“Heritage assets may be affected by direct physical change or by change in their setting. Being able to properly assess the nature, extent and importance of the significance of a heritage asset,*

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<sup>1</sup> Non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets.



*and the contribution of its setting, is very important to understanding the potential impact and acceptability of development proposals.*

*Whether a proposal causes substantial harm will be a judgment for the decision taker, having regard to the circumstances of the case and the policy in the National Planning Policy Framework. In general terms, substantial harm is a high test, so it may not arise in many cases. For example, in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset's significance rather than the scale of the development that is to be assessed. The harm may arise from works to the asset or from development within its setting.*

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

*Proposed development affecting a heritage asset may have no impact on its significance or may enhance its significance and therefore cause no harm to the heritage asset. Where potential harm to designated heritage assets is identified, it needs to be categorised as either less than substantial harm or substantial harm (which includes total loss) in order to identify which policies in the National Planning Policy Framework apply.*

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

#### **1.3.4 Historic England: The Setting of Heritage Assets (GPA3)**

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

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

#### **1.3.5 Historic England: Statements of Heritage Significance (HEAN 12)**

HEAN 12 notes that significance is one of the guiding principles running through the historic environment section of the NPPF. The NPPF defines significance as '*the value of a heritage asset to this and future generations because of its heritage interest*'. Such interest may be '*archaeological, architectural, artistic or historic*' and it may derive '*not only from a heritage asset's physical presence, but also from its setting*'. Significance is what conservation sustains, and where appropriate enhances, in managing change to heritage assets.



HEAN 12 sets out three stages that should be followed to provide the planning authority with an understanding of significance of the heritage asset. That understanding:

- must describe significance following appropriate analysis, no matter what the level of significance or the scope of the proposal;
- should be sufficient, though no more, for an understanding of the impact of the proposal on the significance, both positive and negative; and
- sufficient for the LPA to come to a judgment about the level of impact on that significance and therefore on the merits of the proposal.

This approach is embedded into the following assessment.

#### **1.4 ASSESSMENT METHODOLOGY AND SIGNIFICANCE CRITERIA**

In accordance with best practice the significance of an effect should be identified as part of this assessment.

The prediction of effects and the assessment of their significance is based upon the published guidance cited above, measured using the criteria set out in the Design Manual for Roads and Bridges, 2020, LA104 *Environmental Assessment and Monitoring*, and informed by professional experience. These are considered the most transparent available for heritage assessments.

##### ***1.4.1 Type of Impact***

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

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

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

##### ***1.4.2 Likelihood of the impact occurring***

An assessment is made as to the likelihood of the identified impact occurring. Probability is considered as certain, likely, unlikely or not known.

### 1.4.3 Sensitivity

Five categories of sensitivity are identified. These are expanded upon in **Table 1**, below.

**Table 1** Sensitivity of receptor

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

### 1.4.4 Magnitude

The magnitude of change to an archaeological asset or landscape is considered in terms of its vulnerability, its current condition, and the nature of the impact upon it. Magnitude is assessed as major, moderate, minor, negligible or none and the criteria used in this assessment are set out in **Table 2**, below.

**Table 2**      **Magnitude of Change**

Magnitude of Impact (change)		Typical Description
Major	Adverse	Loss of resource and/or quality and integrity of resource; severe damage to key characteristics, features or elements.
	Beneficial	Large scale or major improvement of resource quality; extensive restoration; major improvement of attribute quality.
Moderate	Adverse	Loss of resource, but not adversely affecting the integrity; partial loss of/damage to key characteristics, features or elements.
	Beneficial	Benefit to, or addition of, key characteristics, features or elements; improvement of attribute quality.
Minor	Adverse	Some measurable change in attributes, quality or vulnerability; minor loss of, or alteration to, one (maybe more) key characteristics, features or elements
	Beneficial	Minor benefit to, or addition of, one (maybe more) key characteristics, features or elements; some beneficial impact on attribute or a reduced risk of negative impact occurring.
Negligible/ Neutral	Adverse	Very minor loss or detrimental alteration to one or more characteristics, features or elements.
	Beneficial	Very minor benefit to or positive addition of one or more characteristics, features or elements.

#### 1.4.5 Assessing significance

The criteria are considered together to reach a conclusion upon the significance of residual effects taking into account any mitigation measures. They may be beneficial or adverse or neutral effects (i.e. no change to the existing situation). In some cases, it may not be possible to quantify the significance of an effect, for example due to a gap in information, and this is noted.

**Table 3** presents a matrix of the inter-relationship of environmental value (sensitivity) with magnitude that leads to a conclusion on the significance of an effect.

**Table 3 Matrix of Significance**

		Baseline Sensitivity				
		Very High	High	Moderate	Low	Very Low
Magnitude of Change	Major Beneficial	Major Beneficial	Major-Moderate Beneficial	Moderate Beneficial	Moderate/Minor Beneficial	Minor Beneficial
	Moderate Beneficial	Major-Moderate Beneficial	Moderate Beneficial	Moderate/Minor Beneficial	Minor Beneficial	Minor/Negligible Beneficial
	Minor Beneficial	Moderate Beneficial	Moderate/Minor Beneficial	Minor Beneficial	Minor/Negligible Beneficial	Negligible
	Neutral	Negligible	Negligible	Negligible	Negligible	Negligible
	Minor Adverse	Moderate Adverse	Moderate/Minor Adverse	Minor Adverse	Minor/Negligible Adverse	Negligible
	Moderate Adverse	Major-Moderate Adverse	Moderate Adverse	Moderate/Minor Adverse	Minor Adverse	Minor/Negligible Adverse
	Major Adverse	Major Adverse	Major-Moderate Adverse	Moderate Adverse	Moderate/Minor Adverse	Minor Adverse

#### 1.4.6 Limitations and Assumptions

The surveys and baseline information were based on a snapshot in time and the information, including that obtained through secondary sources, is assumed correct at that time.

### 1.5 AUTHORSHIP

This assessment has been written by Andrew Josephs and Paul Stamper.

Andrew Josephs (BA Hons Archaeology and Environmental Studies, 1985) has extensive experience of all periods and facets of cultural heritage, including the authorship of over 1000 Heritage Statements, many under the EIA Regulations. He was previously Principal Consultant (Director of Heritage and Archaeology) at Entec (now Wood) and Wardell Armstrong, where he started in 1992, becoming of the UK's first consultants in the post-PPG16 era of developer-funded archaeology. Prior to 1992, he worked as a field-based archaeologist and researcher for universities and units in the UK, Europe and the USA. He lectures widely on heritage and was previously visiting lecturer in Environmental Impact Assessment at the University of Nottingham. He is an experienced expert witness.

## 2. Baseline

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

### 2.1 DESIGNATED HERITAGE ASSETS

A study area of 1km from the boundary of the PDA was considered an appropriate distance to assess the potential effects upon the setting of designated heritage assets given the screening effect of hedges, trees, development and topography. Locations are shown on **Figure 4**.



**Figure 4** Designated Heritage Assets (1km radius of PDA boundary shaded white)

### **2.1.1 Scheduled Monuments**

One scheduled monument lies 650m east of the PDA on the eastern side of the current quarry. Black Ditches (list entry 1006065) is a linear earthwork of unknown date, but tentatively ascribed to the Iron Age or Post-Roman period and possibly related to the Icknield Way.

A field inspection in 1986 described it thus:

*“Surviving N section is in unmanaged deciduous wood, with elder & nettles growing on bank. Subsequent missing section runs alongside pasture. Most of earthwork is in managed birch plantation, with much birch growing in ditch and bracken, grass and occasional birch growing on bank. Southernmost 150m of upstanding bank runs between arable fields; here ditch is ploughed over and three 30 x 30 cms wooden posts are set into W face of bank. Gravel quarrying is taking place to SW of surviving S end, separated from it by a fence.”*

### **2.1.2 Listed Buildings**

There are no listed buildings within 1km of the PDA. The nearest is the Grade II Old Plough (list entry 1257945), a 16<sup>th</sup> century house with later alterations, situated 1250m south east of the PDA.

In Tuddenham, 2km to the west, is the Grade I Church of St. Mary (list entry 1037584).

The Grade II\* Church of St Andrew (list entry 1192820), a medieval church restored in 1870, is situated on the southern edge of the village of Cavenham, 1.9km south of the PDA.

### **2.1.3 Other Designated Cultural Heritage Sites**

There are no World Heritage Sites, Conservation Areas, Registered Battlefields or Registered Historic Parks and Gardens within 1km of the PDA boundary.

## **2.2 HISTORIC LANDSCAPE CHARACTERISATION**

The PDA is within HLC category Type 10.0, sub-type 10.1 defined as:

*Type 10.0. BUILT UP AREA. Sub-type 10.1. Built up area – unspecified. A built up area of unspecified type or size*

### 3. Assessment of The Setting of the Designated Assets

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#### 3.1 INTRODUCTION

The impact of a development can be either direct, or indirect. Indirect impacts are those that do not physically affect a cultural heritage asset, townscape or landscape, but that alter the context or setting. Setting is defined through law, policy and good practice guidance.

*Law:* The Planning (Listed Buildings and Conservation Areas) Act 1990 requires that when considering any planning application that affects a listed building a local planning authority must pay special attention to the desirability of preserving or enhancing the character or appearance of that asset and its setting.

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

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

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

Setting is defined within the NPPF as:

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

*Good practice:* The essential good practice guide for assessment is provided by Historic England's *Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets* (2nd Edition, December 2017). That gives general advice on understanding setting, and how it may contribute to the significance of heritage assets and allow that significance to be appreciated, as well as advice on how views contribute to setting.

The 5-step approach recommended by GPA3, (see section 1.3.4, above), has been followed below. As set out in HEAN 12 (section 1.3.5, above) the aim of the assessment is provide sufficient information *'for the LPA to come to a judgment about the level of impact on that significance and therefore on the merits of the proposal.'*



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

A site visit was carried out in April 2023. Google Earth was also used as a tool for understanding the current extent of mineral extraction in the wider landscape.

Based solely upon distance – that is it sits within the 1km study area - Black Ditches is the only asset that could be affected. There would be no impact upon the setting of listed buildings due to a combination of distance, topography and intervening woodland, as shown on **Figure 5**.

### 3.3 STEP 2: ASSESS THE DEGREE TO WHICH THESE SETTINGS AND VIEWS MAKE A CONTRIBUTION TO THE SIGNIFICANCE OF THE HERITAGE ASSET(S) OR ALLOW SIGNIFICANCE TO BE APPRECIATED

The focus of the following assessment is therefore upon Black Ditches which due to proximity is potentially within the setting of the PDA.

The site visit carried out in April 2023 examined the views between the scheduled monument and the PDA. Google Earth (**Figure 6**) also clearly shows that the land between the scheduled monument and the PDA is currently being worked and restored, the working coming to approximately 50m of the monument from the quarry's eastern boundary.



**Figure 5** Designated Heritage Assets in wider landscape and intervening woodland shaded green; development orange. © Google base photo



**Figure 6** The current setting of Black Ditches is clearly visible from the air with mineral workings close to its boundary. Also showing the location and direction of photographs 1-5 © Google base photo



**Figure 7** View along Black Ditches at photograph location 1





**Figure 8** View towards PDA (arrowed red) from Black Ditches at photograph location 1



**Figure 9** View along Black Ditches at photograph location 2





**Figure 10** View towards PDA (arrowed red) – not visible - from Black Ditches at photograph location 2



**Figure 11** View along Black Ditches showing a pronounced bank at photograph location 3





**Figure 12** View towards PDA (arrowed red) – not visible - from Black Ditches at photograph location 3



**Figure 13** View towards Black Ditches (arrowed red) within tree belt from western side of PDA at photograph location 4



**Figure 14** View towards Black Ditches (arrowed red) within tree belt from eastern side of PDA at photograph location 4

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

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

As established above, the only asset with some visibility of the PDA is Black Ditches scheduled monument. The monument sits adjacent to active mineral workings that have been ongoing since at least the 1980s.

There would be views of the PDA at a distance of 650m, filtered by trees along the monument, at the southern end of the scheduled area. There would be no views from the central or northern parts of the monument.

The view would form a very small part of the panorama from that location (no. 1 on **Figure 6**) and would be absorbed into an existing backdrop of development that includes industrial processes (outside the Applicant's land ownership) which is of similar scale to the proposed soil washing plant.

After restoration and closure of the quarry, the soil washing plant would be dismantled.

The effects are assessed as being of negligible magnitude during construction and operation, and neutral after dismantling.

Cumulative effects are also assessed as being of negligible magnitude during construction and operation, and neutral after dismantling, as a result of the addition of an industrial feature next to an existing industrial facility and plant site.

There would be no affect upon our ability to appreciate the significance of the monument.

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

None are considered necessary.

### **3.6 STEP 5: MAKE AND DOCUMENT THE DECISION AND MONITOR OUTCOMES**

In accordance with the EIA Regulations the significance of an effect should be identified taking into account mitigation incorporated into the proposed development. This is achieved using the guidance and methodology set out in **Sections 1.3 and 1.4**.

This is also in accordance with Step 3 of Historic England's guidance (GPA3 2017), which is to assess the effects of the proposed development, whether beneficial or harmful, on the significance of an asset or on the ability to appreciate its setting.

Our assessment of the potential effects of the proposed scheme, based upon heritage guidance and taking into account the findings of other relevant assessments, is set out in **Table 4**, below.

**Table 4**                      **Effects and Evaluation of Significance**

	Type of Effect	Probability of Effect Occurring	Sensitivity	Magnitude of change caused by the proposed development	Significance of change (effect) caused by the proposed development	Rationale
Adverse direct effects upon designated assets of the historic environment	None	Certain	High/Medium	None	Neutral	There will be no adverse direct effects upon statutorily designated assets.
Effects upon archaeology within PDA	None	Certain	N/A	N/A	Neutral	The PDA has been historically disturbed
Indirect effects upon setting of Black Ditches scheduled monument						
Construction and Operation	Negative	Likely	High	Negligible	Negligible	There would be views of the PDA at a distance of 650m, filtered by trees along the monument, at the southern end of the scheduled area. There would be no views from the central or northern parts of the monument. The view would form a very small part of the panorama and would be absorbed into an existing context of mineral workings that have been sited next to the monument for at least 40 years.
After dismantling and restoration	None	Certain	High	None	Neutral	After restoration and closure of the quarry, the soil washing plant would be dismantled and the land restored.
Cumulative Effects	Negative	Likely	High	Negligible	Negligible	The development would have a negligible cumulative effect upon the monument as a result of the addition of an industrial feature next to an existing industrial facility and plant site.



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## 4. Summary

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### 4.1 SCOPE OF WORK

This report presents the findings of a cultural heritage assessment for the proposed construction of a soils washing plant at Marston's Pit Quarry, Cavenham, Suffolk. The proposed development is wholly within the existing recycling area that has already been disturbed and from an archaeological perspective retains no potential. This report therefore concentrates on the setting of designated heritage assets.

The potential effects upon heritage have been assessed within the framework of national planning policy and guidance.

Specifically, this assessment has been undertaken in line with paragraph 194 of NPPF (2023):

*In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance....*

A variety of sources were consulted including the Suffolk Historic Environment Record, DEFRA Magic and the Historic England Archive.

A site visit was carried out in April 2023.

### 4.2 INDIRECT EFFECTS

Based solely upon distance – that is it sits within the 1km study area - Black Ditches is the only asset that could be affected. There would be no impact upon the setting of listed buildings, conservation areas, World Heritage Sites, Historic Parks and Gardens or Battlefields due to a combination of distance, topography and intervening woodland. None lie within 1km of the PDA.

There would be views of the PDA at a distance of 650m, filtered by trees along the monument, at the southern end of the Black Ditches scheduled area. There would be no views from the central or northern parts of the monument. The monument sits adjacent to active mineral workings that have been ongoing since at least the 1980s.

The view of the PDA would form a very small part of the panorama and would be absorbed into an existing backdrop of development that includes industrial processes (outside the Applicant's land ownership) which is of similar scale to the proposed soil washing plant.

After restoration and closure of the quarry, the soils washing plant would be dismantled.

### 4.3 ASSESSMENT OF EFFECTS

The key factor in an assessment is to determine the effects upon significance and how that can affect our ability to appreciate the asset, the test set in Historic England guidance.

The effects are assessed as being of negligible magnitude during construction and operation, and neutral after dismantling.

Cumulative effects are also assessed as being of negligible magnitude during construction and operation, and neutral after dismantling, as a result of the addition of an industrial feature next to an existing industrial facility and plant site.

#### **4.4 CONCLUSION**

Having regard to the baseline conditions and the nature of the proposed development, this assessment has concluded that there will be an adverse effect of negligible magnitude upon the setting of Black Ditches, but no affect upon our ability to appreciate the significance of the heritage asset. In NPPF terms, this effect falls at the lowest end of the 'less than substantial harm' scale.

There would be no effects upon the monument after dismantling and restoration.

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



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