

Heritage Response on behalf of Noble Foods Ltd to Site Options Ref GNLP3035
Fengate Farm (alternative option) and GNLP2143 Land South of Le Neve Road
(preferred option), Marsham
January 2021

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Report

Heritage Response on behalf of Noble Foods Ltd to Site Options Ref: GNLP3035 - Fengate Farm (alternative option) and GNLP2143 - Land South of Le Neve Road (preferred option)

Site

Fengate Farm and Land to South of Le Neve Road, Marsham

Client

Noble Foods Limited

Planning Authority

Broadland District Council

Site Centred At

NGR TG 19610 24200 and TG 19485 23702

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Contents

<i>Executive Summary</i>	<i>iii</i>
1.0 Introduction	1
2.0 Planning background and development plan framework	4
3.0 Location and significance of heritage assets	8
4.0 Assessment of potential heritage impacts should site come forward for allocation	14
5.0 Summary and conclusions	20
Sources consulted	21

List of Figures

- Figure 1** Location and extent of Site Options GNLP3035 - Fengate Farm (alternative site) and GNLP2143 – Land to South of Le Neve Road (preferred option)
- Figure 2** Aerial view of alternative Site Option GNLP3035 - Fengate Farm
- Figure 3** Aerial view of preferred Site Option GNLP2143 – Land South of Le Neve Road
- Figure 4** Designated Heritage assets in vicinity of the site options (i.e. within 1km).
- Figure 5** Extract from 1885-7 Ordnance Survey map showing the site options and immediate environs at this time.
- Figure 6** Extract from 1950 Ordnance Survey map showing the site options and immediate environs at this time.
- Figure 7** Extract from 1973-9 Ordnance Survey map showing the site options and immediate environs at this time. Note the agricultural buildings on the Fengate Farm site, which are evident at this time.
- Figure 8** Extract from 2000 Ordnance Survey map showing the site options and immediate environs at this time.

Executive Summary

This heritage report has been prepared on behalf of Noble Foods Limited, who are promoting land at Fengate Farm (GNLP3035) for an alternative residential site in Marsham. It considers the preferred Site Option GNLP2143 - South of Le Neve Road and the alternative GNLP3035 - Fengate Farm site, both located on the edge of the Marsham settlement. Both are assessed in the evolving Greater Norwich Local Plan (GNLP) and are assessed in the Draft GNLP Sites document (Marsham Booklet – Regulation 18 Assessment). The assessments included in the Draft GNLP Sites document identified the GNLP2143 – Land to South of Le Neve Road as the preferred option. GNLP 3035 – Fengate Farm was identified as an unreasonable site. The Draft GNLP Sites document has been reviewed and outlines the potential impacts that future development of the two sites would have, including on the settings of those heritage assets located in the vicinity of each site.

The key objectives of this report are to:

- Review the heritage impact assessment for the two site options, to determine if we concur with the recommendations and conclusions reached for each site option.
- Assess further the potential heritage impacts associated with the future development of each site option.
- Recommend appropriate locations for development within the GNLP3035 – Fengate Farm site, which could be developed with limited impact on the settings of nearby heritage assets, if the site was to be brought forward for allocation. This would consider if there are any constraints presented by the heritage assets that would limit where development could occur within the land parcel.
- Recommend appropriate landscape buffers and other mitigative measures to ensure that the settings of nearby heritage assets are adequately protected.

The main conclusion with reference to the GNLP3035 - Fengate Farm site is that future development could occur, should it come forward for allocation. Where development does occur, however, the design approach will require careful consideration to ensure that the settings of nearby heritage assets are not impacted visually. These measures should include sensitively sited development, which is of a restrained scale with adequate landscaped buffers and natural screening introduced, particularly along the eastern and southern boundaries. Subject to these measures being utilised, the settings of the nearby heritage assets identified, which include 'The Willows' and the 'Village Hall', would not be adversely impacted by future development within the site. In this regard, there are no heritage constraints that would prevent the site from being brought forward for allocation for development purposes.

The heritage constraints associated with the GNLP2143 – Land South of Le Neve Road site are considered greater. The proximity of the potential allocation site to a number of heritage assets, which include the Grade I listed All Saints Church, raises a number of heritage sensitivities. Any future development within the site is highly likely to adversely impact the setting and landmark qualities of the church tower, in particular. Even with appropriate mitigative measures, such as the utilisation of landscape buffers and natural screening, it is considered that between 25 and 35 residential units on this site will be perceived in the key views of the church, particularly from the west and south-west (there is an extensive network of public tracks in these areas). The All Saints Church building has prominence in surrounding views, including those from Norwich Road and from the potential allocation site. The open nature of the agricultural fields to the west and south-west contribute to the open setting of the heritage asset, with the church tower having prominence from these vantage points. The church tower is also evident in views from the western end of High Street, Marsham and is largely unimpeded visually from this vantage point. The allocation of the Land South of Le Neve Road site to accommodate 25-35 dwellings and an extension to the

cemetery, has the potential to visually impede the views noted, which would impact on the landmark qualities and setting of the heritage asset. The views noted contribute to the semi-rural setting of the heritage asset.

In heritage terms, it is our opinion that the GNLP3035 – Fengate Farm site is less sensitive. The potential heritage impacts associated with the GNLP2143 – Land South of Le Neve Road site are considered greater, with any future development within this site likely to adversely impact the semi-rural setting and landmark qualities of the Grade I listed All Saints Church, in particular.

1.0 Introduction

Background

- 1.1** This heritage report has been prepared on behalf of Noble Foods Limited, who are promoting land at Fengate Farm (GNLP3035) for an alternative residential site in Marsham. It considers the preferred Site Option GNLP2143 - South of Le Neve Road and the alternative GNLP3035 - Fengate Farm site, both located on the edge of the Marsham settlement. Both are assessed in the evolving Greater Norwich Local Plan (GNLP), with the Land South of Le Neve Road site identified as the preferred option for mixed use allocation. The Fengate Farm site was ruled out as an unreasonable site on a number of grounds including site access, with previous assessments also identifying potential heritage impacts. The Regulation 18 HELAA concluded that the Fengate Farm site should score amber and the Land to the South of Le Neve Road should score green. The Draft GNLP Sites document has been reviewed and outlines the potential impacts that future development of the two site options would have, including on the settings of those heritage assets located in the vicinity of each site.
- 1.2** The Fengate Farm site is located to the north of High Street and to the south of Fengate Lane (National Grid Reference TG 19610 24200 – figures 1 and 2). The Land to the South of Le Neve Road site is located to the west of Norwich Road and south-west of Croft Lane (National Grid Reference TG 19485 23702 – figures 1 and 2).
- 1.3** In accordance with the Paragraph 189 of the *National Planning Policy Framework* (NPPF 2019) and the requirement for applicants to describe the significance of heritage assets including contribution to setting, this report draws together available information on designated and non-designated heritage assets that are likely to be impacted by potential future development within the site.
- 1.4** The key objectives of this report are to:
- Review the heritage impact assessment for the two site options, to determine if we concur with the recommendations and conclusions reached for each option.
 - Assess further the potential heritage impacts associated with the future development of each site option.
 - Recommend appropriate locations for development within the GNLP3035 – Fengate Farm site, which could be developed with limited impact on the settings of nearby heritage assets, if the site was to be brought forward for allocation. This would consider if there are any constraints presented by the heritage assets that would limit where development could occur within the land parcel.
 - Recommend appropriate landscape buffers and other mitigative measures to ensure that the settings of nearby heritage assets are adequately protected.
- 1.5** This report considers built heritage only.

Location and description

Fengate Farm site

- 1.6** The Fengate Farm (GNLP3035) site is located to the north of High Street and to the south of Fengate. There are a number of former agricultural buildings on the site, which date from the later 20th century.
- 1.7** To the north of the site are a number of mainly later 20th century residential buildings located on the south side of Fengate Lane. To the east are a number of altered 19th

century buildings, which include The Plough Inn, which sits on the corner of the Norwich Road and Fengate Lane. These buildings have seen notable change over time.

- 1.8 To the south-east of the site is the Grade II listed 'The Willows' (NHLE no. 1050920 – Figure 4), which is located at the eastern end of High Street (north side).
- 1.9 To the south of the site is the Grade II listed 'Village Hall' (NHLE no. 1050919 – Figure 4), which is located on the north side of High Street.
- 1.10 The site is not located within a Conservation Area nor are there any in the immediate vicinity.

Land to south of Le Neve Road site

- 1.11 There are no standing buildings within the Land to South of Le Neve Road site (GNLP2143).
- 1.12 To the east is a group of listed buildings, which include the Grade I listed All Saints Church (NHLE no. 1250332 – Figure 4, located on the west side of Church Lane), the Grade II listed 'The Old Rectory' (NHLE no. 1372969) and the Grade II listed 'Colenso Cottage' (NHLE no. 1372970), which is located on the west side of the Norwich Road.
- 1.13 The site is not located within a Conservation Area nor are there any in the immediate vicinity.

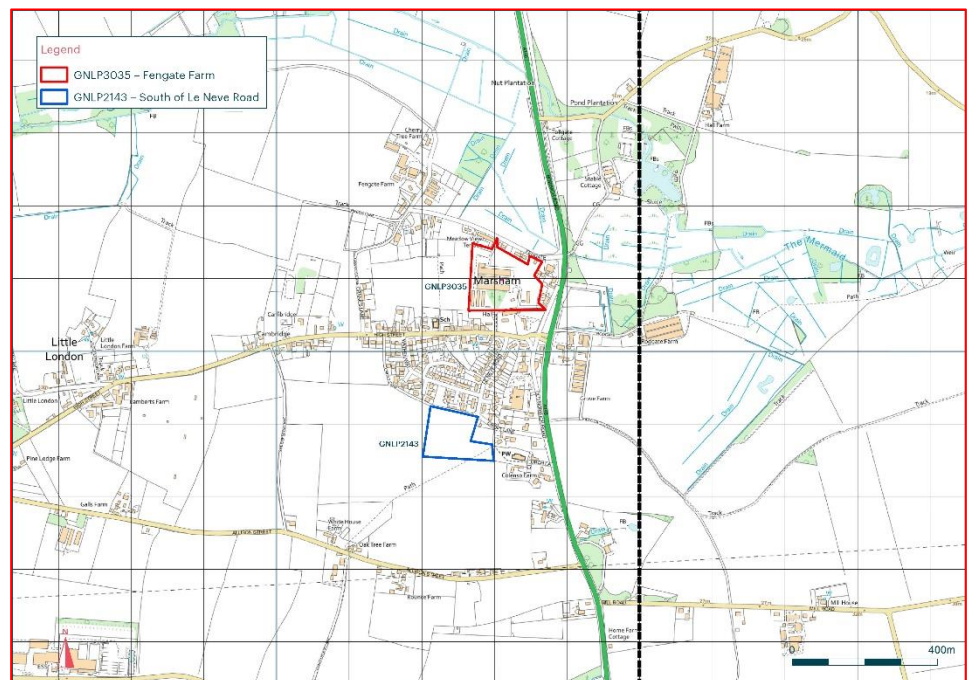


Figure 1 Location and extent of Site Options GNLP3035- Fengate Farm (alternative site) and GNLP2143 – Land to South of Le Neve Road (preferred site)



Figure 2 Aerial view of alternative Site Option GNL3035 - Fengate Farm



Figure 3 Aerial view of preferred Site Option GNL2143 - South of Le Neve Road

2.0 Planning Background and Development Plan Framework

Planning (Listed Building and Conservation Areas) Act 1990

2.1 The *Planning (Listed Building and Conservation Areas) Act 1990* sets out broad policies and obligations relevant to the protection of Listed Buildings and Conservation Areas and their settings.

2.2 Section 66(1) states:

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.

National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG)

2.3 Government policy in relation to the historic environment is outlined in Section 16 of the *National Planning Policy Framework (NPPF 2019)*, entitled *Conserving and Enhancing the Historic Environment*. This provides guidance for planning authorities, property owners, developers and others on the conservation and investigation of heritage assets. Overall, the objectives of Section 16 of the NPPF can be summarised as seeking the:

- Delivery of sustainable development;
- understanding the wider social, cultural, economic and environmental benefits brought by the conservation of the historic environment;
- conservation of England's heritage assets in a manner appropriate to their significance; and
- recognition of the contribution that heritage assets make to our knowledge and understanding of the past.

2.4 Section 16 of the NPPF recognises that intelligently managed change may sometimes be necessary if heritage assets are to be maintained for the long term.

2.5 Paragraph 185 relates to local development plans and states as follows:

Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:

a) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;

b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;

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

d) opportunities to draw on the contribution made by the historic environment to the character of a place.

2.6 Paragraph 190 states that:

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.

2.7 The key test in NPPF paragraphs 193-196 is whether a proposed development will result in substantial harm or less than substantial harm. However, substantial harm is not defined in the NPPF.

2.8 Paragraph 196 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.

2.9 The NPPF is supported by the *National Planning Practice Guidance* (NPPG). Paragraph 18a-001 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.

2.10 Paragraph 18a-002 states that:

Where changes are proposed, the National Planning Policy Framework sets out a clear framework for both plan-making and decision-making in respect of applications for planning permission and listed building consent to ensure that heritage assets are conserved, and where appropriate enhanced, in a manner that is consistent with their significance and thereby achieving sustainable development. Heritage assets are either designated heritage assets or non-designated heritage assets.

2.11 The NPPG outlines 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 places that may have limited or no inter-visibility with each other. This may be historic as well as aesthetic connections that contribute or enhance the significance of one or more of the heritage assets.

2.12 Paragraph 197 states:

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 judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

Local Planning Policy

2.13 The Broadland Local Plan comprises a number of documents that include the *Joint Core Strategy for Broadland, Norwich and South Norfolk* (JCS 2011 amended 2014), the *Development Management Policies Document* (DMPD 2015) and the *Site Specific Allocations and Policies Document* (SSAPD 2015).

2.14 The JCS 2011 contains a number of overarching policies that are relevant, including Policy 1: Addressing climate change and protecting environmental assets and Policy 2: Promoting good design, which recognise the importance of the district's heritage. The relevant part of Policy 1 states:

The built environment, heritage assets, and the wider historic environment will be conserved and enhanced through the protection of buildings and structures which contribute to their surroundings, the protection of their settings, the encouragement of high-quality maintenance and repair and the enhancement of public spaces.

2.15 The relevant part of Policy 2 states:

All development will be designed to the highest possible standards, creating a strong sense of place.

In particular development proposals will respect local distinctiveness including as appropriate:

- *the landscape character and historic environment, taking account of conservation area appraisals and including the wider countryside; and*
- *townscape, including the city and the varied character of our market towns and villages*

2.16 The emerging *Greater Norwich Local Plan 2018-2038* (Emerging GNLP) also contains a number of relevant heritage conservation policies, which Noble Foods Limited also intends to submit representations on. The Site Options GNLP2143 - Land to South of Le Neve Road and GNLP3035 - Fengate Farm are both included in the Emerging GNLP and are assessed in the Draft GNLP Sites document. The assessments included in the Draft GNLP Sites document identified GNLP2143 – South of Le Neve Road as the preferred option and GNLP 3035 – Fengate Farm as an unreasonable site.

Other Guidance

Historic Environment Good Practice Advice In Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment (Historic England 2015)

2.17 The purpose of this document is to provide information to assist local authorities, planning and other consultants, owners, applicants and other interested parties in implementing historic environment policy in the NPPF and NPPG. It outlines a six-stage process to the assembly and analysis of relevant information relating to heritage assets potentially affected by a proposed development:

- Understand the significance of the affected assets;
- Understand the impact of the proposal on that significance;
- Avoid, minimise and mitigate impact in a way that meets the objectives of the NPPF;
- Look for opportunities to better reveal or enhance significance;
- Justify any harmful impacts in terms of the sustainable development objective of conserving significance and the need for change; and
- Offset negative impacts on aspects of significance by enhancing others through recording, disseminating and archiving archaeological and historical interest of the important elements of the heritage assets affected.

Historic Environment Good Practice Advice In Planning Note 3: The Setting of Heritage Assets (Historic England 2017)

2.18 Historic England’s Historic Environment Good Practice Advice in Planning Note 3 provides guidance on the management of change within the setting of heritage assets.

2.19 The document restates the definition of setting as outlined in Annex 2 of the NPPF. Setting is also described as being a separate term to curtilage, character and context; while it is largely a visual term, setting, and thus the way in which an asset is experienced, can also be affected by noise, vibration, odour and other factors. The document makes it clear that setting is not a heritage asset, nor is it a heritage

designation, though land within a setting may itself be designated. Its importance lies in what the setting contributes to the significance of a heritage asset.

2.20 The Good Practice Advice Note sets out a five-stage process for assessing the implications of proposed developments on setting:

1. Identification of heritage assets which are likely to be affected by proposals;
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; and
5. Making and documenting the decision and monitoring outcomes

2.21 The guidance reiterates the NPPF in stating that where developments affecting the setting of heritage assets results in a level of harm to significance, this harm, whether substantial or less than substantial, should be weighed against the public benefits of the scheme.

3.0 Location and significance of heritage assets

Introduction

- 3.1** The designated and non-designated heritage assets in the immediate and wider environs of the site options are discussed below; those designated heritage assets in the wider vicinity (within 1km) of each site option are shown in Figure 4.

Designated Heritage Assets

Listed Buildings

Fengate Farm site

- 3.2** There are no listed buildings within the Fengate Farm site. In the immediate vicinity, however, there are a number of listed buildings, which are discussed in turn below.

The Willows: Grade II listed

- 3.3** 'The Willows' is Grade II listed (NHLE no. 1050920) and located approx. 35 metres to the south-east of the site. The NHLE list description for the heritage asset is cited below.

Former farm-house, c.1700 of red brick and colour washed brick with smut pantile roof. 2-storeys and attics extended in C18 or C19 with 2 storeys to the north. Facade to east once 5 bays, though C20 2 storey timber frame porch masks central section. Brick plinth, corbelled brick plat band at first floor level, string course at eaves level and clasping pilasters with capitals at each end. Windows inserted in C20. South gable has 2 C20 windows at first floor, and 2 blocked windows to attic. Central sun dial dated 1651. Curved gables at each end with plat bands at attic floor level and gable stacks. 3, C20 flat roofed dormers with casement windows. Hipped roof extension and single C20 extension to north not of special interest. Tie irons in the form of "I. G."

- 3.4** The heritage asset is glimpsed in views from High Street, but the inter-visibility between the Fengate Farm site and the listed building is hindered by natural screening. In this regard, the setting of the heritage asset is contained and limited to the glimpsed views of the principal south and east elevations from High Street.

Village Hall: Grade II listed

- 3.5** Located approx. 40 metres to the south of the site is the Grade II listed 'Village Hall' (NHLE no. 1050919 – Figure 4), which is located on the north side of High Street. The NHLE list description for the heritage asset is cited below.

Improvement Institute, now village hall, built 1857 of red brick and black pantiles. Single storey 'L'-shaped plan. Facade 3 windows with central porch. Brick rusticated to corners and corbelled brick eaves. 3 light casement windows with flat gauged brick arches with projecting key blocks. Rusticated brick quoins on porch with semi-circular gauged brick arch over entrance with blocked oculus above. Over the entrance an inscribed stone panel. End gable stacks. C19 and C20 extensions at rear not of special interest. Inscription over the entrance door "Mutual Improvement Institution". To the left of the door tablets inscribed "J. H. Warnes, May 10th 1859" and "This Institute was established by George Shreeve, November 2nd 1857". Bricks on porch variously inscribed, including "Miss L. Warnes".

- 3.6** The heritage asset is of an intimate single-storey scale, with its principal south elevation fronting High Street. The existing natural screening at the rear is substantial and impedes any visual connections between the heritage asset and the Fengate Farm site to the north.

3.7 Other listed buildings within the wider vicinity of the Fengate Farm site include the following:

- ‘Grove Farmhouse’, which is Grade II listed (NHLE no. 1050921) and located approx. 120 metres to the south-east.
- ‘Bolwick Hall’, which is Grade II listed (NHLE no. 1372982) and located approx. 280 metres to the north-east.
- ‘Garden House at Bolwick Hall’, which is Grade II listed (NHLE no. 1050871) and located approx. 310 metres to the north-east.
- ‘Stable Block at Bolwick Hall’, which is Grade II listed (NHLE no. 1050872) and located approx. 310 metres to the north-east.

Land South of Le Neve Road site

3.8 There are no listed buildings within the Land South of Le Neve Road site. In the immediate vicinity, however, there are a number of listed buildings, which are discussed in turn below.

All Saints Church: Grade I listed

3.9 All Saints Church is Grade I listed (NHLE no. 1250332) and adjoins the site. The NHLE list description for the heritage asset is cited below.

Parish Church. C13 and later, of flint with stone dressings and slate roof. West tower, north aisle, south aisle, south porch, nave, clerestory, vestry and chancel. 2 stage tower with diagonal buttresses, C14 2 light windows, 1 light sound hole, 2 light belfry openings with flowing tracery to north, and decayed or debased, to east, west and south. Chequered flint parapet. 5 bay north aisle with blocked western door, stepped buttresses and late C15 3 light Perpendicular windows. 5 bay south aisle with 4 late Perpendicular 3 light windows with 3 centred stilted arches. South porch with diagonal buttresses with tall C14 doorway, one light windows and within C13 door to church. 5 bay clerestory, with 3 light Perpendicular windows with quatrefoil in shallow 2 centred arch. Chancel with diagonal and angle buttresses, mainly C19 restoration with C19 windows. Lean-to vestry on north side with squint to west, and 3 light window. Mediaeval north and south oak doors. North aisle with niche, piscina and doorway to Rood Loft stairs. 5 bay arcade with octagonal piers with base and capitals, possibly C14 to south and C15 to north. Fine C15 single hammerbeam roof with later tie beams and binders, reinforcing alternate trusses. Octagonal wall timber posts with bases capitals and arch braces, supported on carved stone corbels. Spandrels of some arch braces have tracery carved angels at the ends of the hammerbeams. South aisle with piscina at east end. Chancel arch with the remains of C15 screen, Decorated with sixteen painted saints. Font on 2 steps, the upper decorated with pointed quatrefoils. Bowl with seven sacraments and last judgement. Poppyhead ends to restored benches. Chancel stained glass by Kempe.

3.10 The heritage asset is prominent in surrounding views including those from Norwich Road and the site. The open nature of the agricultural fields to the west and south-west contribute to the open setting of the heritage asset, with the church tower having prominence from these vantage points.

Old Rectory: Grade II listed

3.11 ‘The Old Rectory’ is Grade II listed (NHLE no. 1372969) and is located approx. 50 metres to the east of the site. The NHLE list description for the heritage asset is cited below.

Former Rectory, early C19 and later, of colour washed red brick and gault brick with slate roofs. Double pile of 2 storeys and attics, extended to the east with 2 storey front, and with single storey service wing to the west. Double pile section has 3 sash windows on each elevation, with glazing bars and segmental gauged brick arches.

'Italianate' porch to north with half glazed double doors and semi-circular fanlight within. Taller eastern pile of gault brick has facade of 3 windows to east, with plinth, double pilasters at the corners, and plat band at first floor level. Sash windows with glazing bars, stone sills and gauged brick arches. Hipped roofs with 5 axial stacks. Included for group value.

- 3.12** The heritage asset is not overly prominent visually from its immediate environs. Its south elevation is partially evident from the churchyard that adjoins it to the south, although views of the heritage asset are impeded from the agricultural fields to the west and south-west.

Colenso Cottage: Grade II listed

- 3.13** 'Colenso Cottage' (NHLE no. 1372970 – Grade II listed) is located on the west side of the Norwich Road approx. 130 metres to the south-east of the site. The NHLE list description for the heritage asset is cited below.

House, c.1700, extended 1837, of red brick and pantiles. 'L'-shaped plan, of 2 storeys and attic with single storey at rear. Original building, 3 windows, with flint plinth, clasping pilasters with moulded brick capitals, moulded brick plat band at first floor level at south and east and at attic floor level on east gable. Central projecting brick door surround with moulded brick cornice and segmental pediment. Faded dummy window over door with segmental brick arch. C20 sash windows in reduced openings under flat brick soldier arches at first floor level, under plat band at ground floor level. C19 extension to east, 2 windows with C20 sash windows with gauged segmental brick arches. Door to left with rendered brick surround. Eaves raised over C18 section, to form brick dentil eaves over whole buildings. C18 single storey wing at rear with brick dentil eaves. End gable stacks and off-centre axial stack corresponding with the gable of the C18 house. Extension added in 1837 as a Registry Office.

- 3.14** The heritage asset has visual prominence from the Norwich Road to the east, with the agricultural fields to its west contributing to its rural setting in backdrop views.

Marsham War Memorial: Grade II listed

- 3.15** The Marsham War Memorial (NHLE no. 1464599) is located to the east of All Saints Church and dates from circa 1920.

- 3.16** The locations of the listed buildings identified above are shown in Figure 4.

Conservation Areas

- 3.17** There are no Conservation Areas in the immediate or wider vicinity (i.e. within 1 km) of the Site Options.

Non-Designated Heritage Assets

Locally Listed Buildings

- 3.18** There are no Locally Listed Buildings within or in the vicinity of the Site Options.

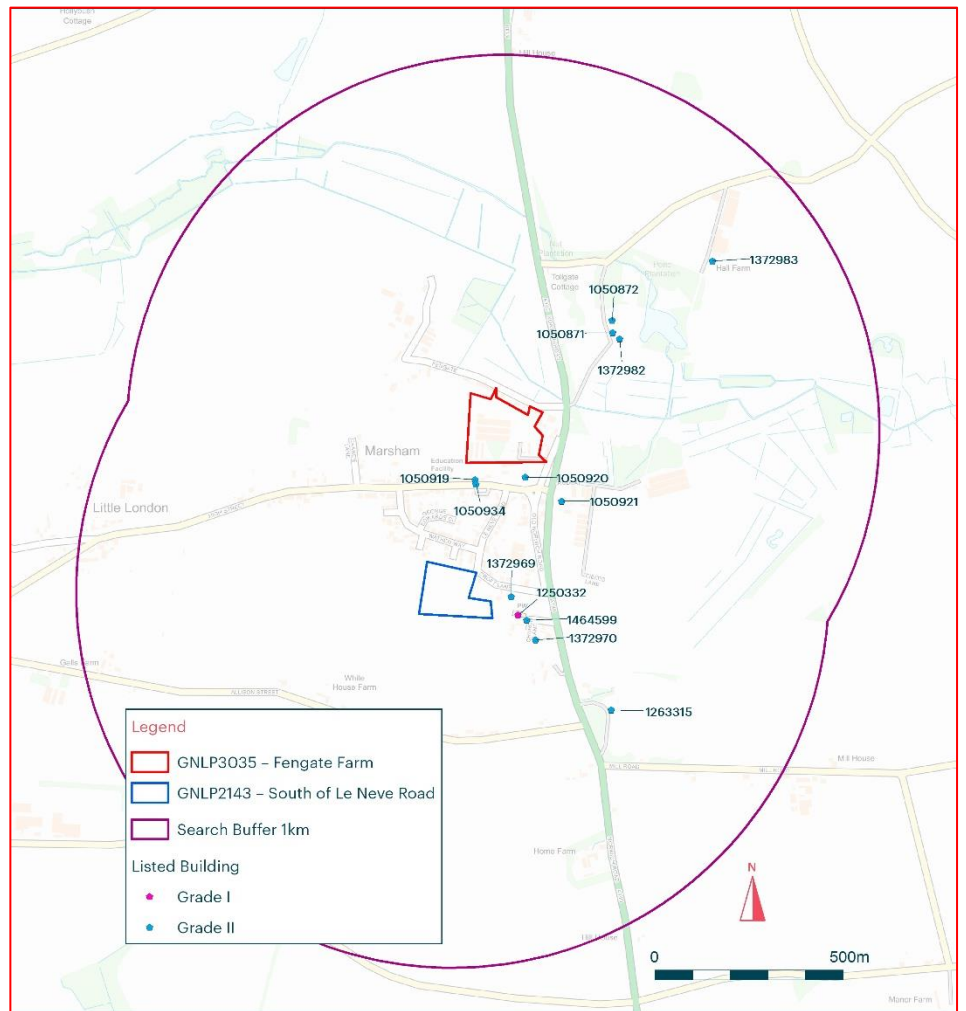


Figure 4 Designated Heritage assets in vicinity of the site options (i.e. within 1km).

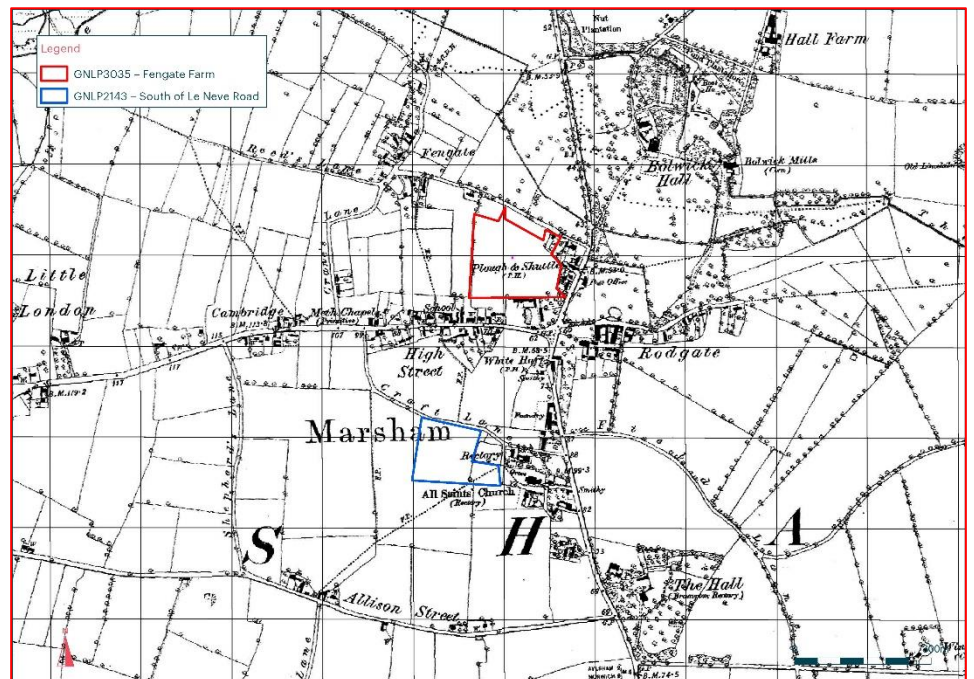


Figure 5 Extract from 1885-7 Ordnance Survey map showing the site options and immediate environs at this time.

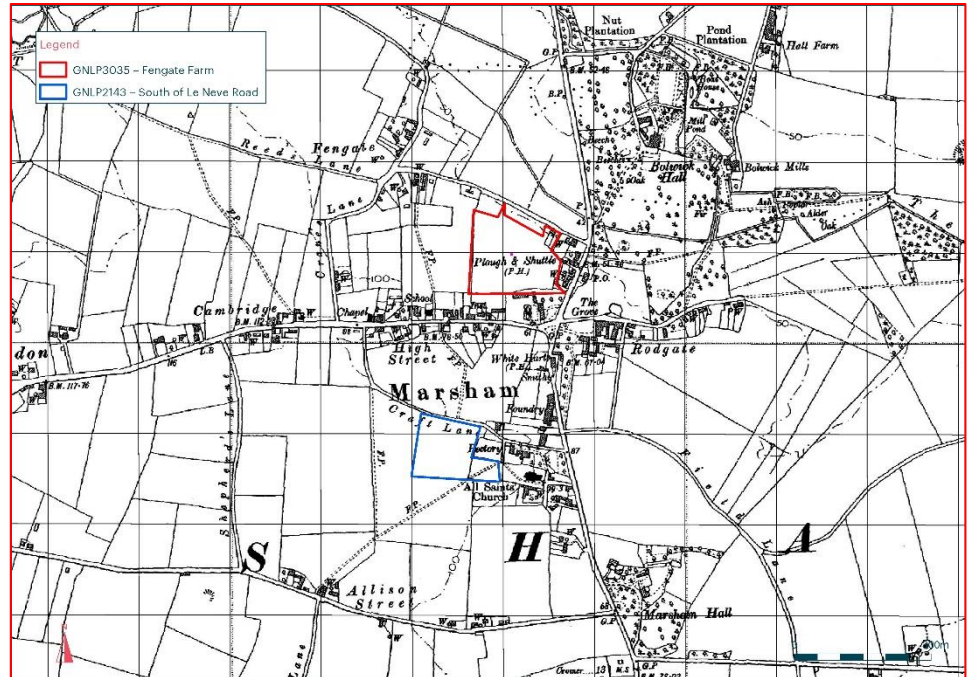


Figure 6 Extract from 1950 Ordnance Survey map showing the site options and immediate environs at this time.

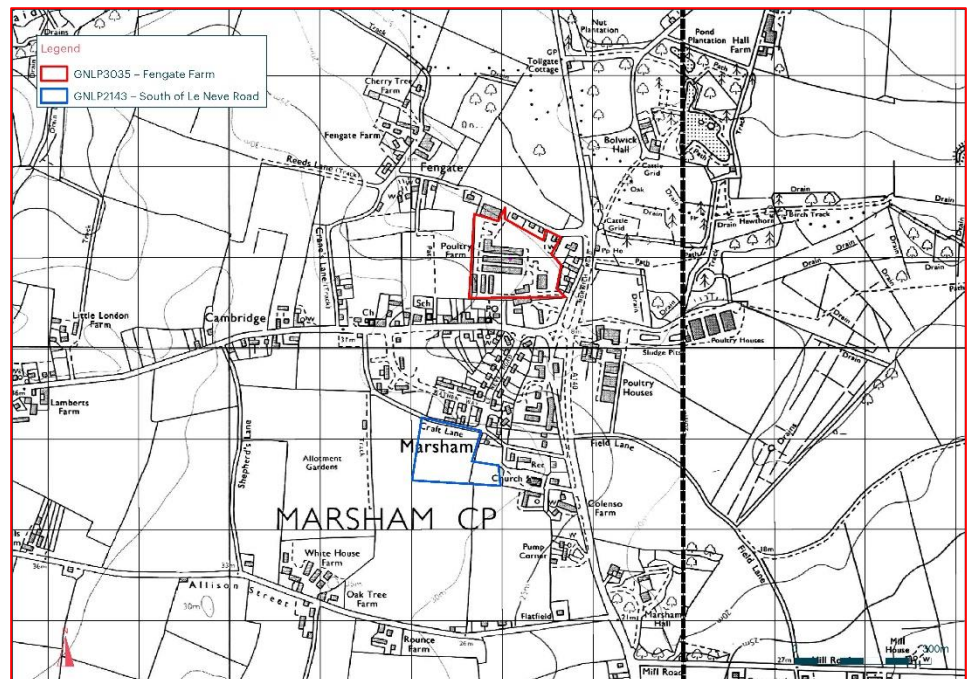


Figure 7 Extract from 1973-9 Ordnance Survey map showing the site options and immediate environs at this time. Note the agricultural buildings on the Fengate Farm site, which are evident at this time.

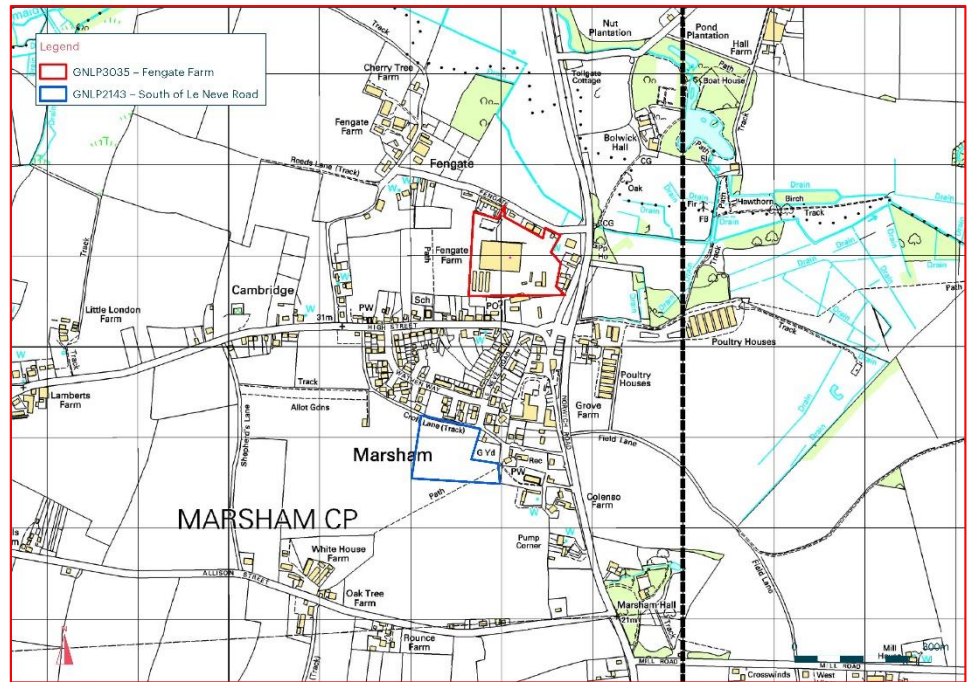


Figure 8 Extract from 2000 Ordnance Survey map showing the site options and immediate environs at this time.

4.0 Assessment of potential heritage impacts

Background

- 4.1** This section assesses the potential heritage impacts associated with site options GNLP2143 – Land to South of Le Neve Road and GNLP3035- Fengate Farm.
- 4.2** The key objectives of this assessment are to:
- Review the heritage impact assessment for the two site options, to determine if we concur with the recommendations and conclusions reached for each site option.
 - Assess further the potential heritage impacts associated with the future development of each site option.
 - Recommend appropriate locations for development within the GNLP3035 – Fengate Farm site, which could be developed with limited impact on the settings of nearby heritage assets, if the site was to be brought forward for allocation. This would consider if there are any constraints presented by the heritage assets that would limit where development could occur within the land parcel.
 - Recommend appropriate landscape buffers and other mitigative measures to ensure that the settings of nearby heritage assets are adequately protected.

Potential impacts of future development on heritage assets

Generally

- 4.3** A heritage impact assessment of the alternative and preferred site options has been carried out within the Site Assessment 13 – Historic Environment of GNLP: Regulation 18(C). The commentary below assesses the potential impacts that development within each would have on the settings of those heritage assets in the vicinity of each site.
- 4.4** The heritage assets identified in Section 3 are discussed further below. Each is discussed with reference to the impact assessments prepared as part of the Draft GNLP Sites document (Stage 6 – Detailed Site Assessments of Reasonable Alternative Sites and Stage 7 – Settlement Based Appraisal of Reasonable Alternative Sites and Identification of Preferred Site/s for Regulation 18C Draft Plan Consultation). The relevant concluding text is italicised with a response provided below in each case.

Fengate Farm site

- 4.5** The Marsham Booklet does not specifically mention the Grade II listed buildings in the immediate and wider vicinity of the Fengate Farm site, with the exception of Bolwick Hall and outbuildings, located to the north-east of the site.

Listed buildings in immediate vicinity

- 4.6** Those heritage assets in close proximity to the site include the Grade II listed ‘The Willows’ and ‘Village Hall’, both located on the north side of High Street.
- 4.7** As noted, the grounds and landscape elements contribute to the significance and setting of the Willows. The heritage asset is glimpsed in views from High Street, but the inter-visibility between the Fengate Farm site and the listed building is hindered by natural screening. In this regard, the setting of the heritage asset is contained and limited to the glimpsed views of the principal south and east elevations from High Street. In this regard, the Fengate Farm site has capacity to accommodate future development without adversely impacting the setting of the heritage asset, subject to development being of an intimate scale, low density and adequately screened.

- 4.8** The Village Hall is of an intimate single-storey scale, with its principal south elevation fronting High Street. The existing natural screening at the rear is substantial and impedes any visual connections between the heritage asset and the Fengate Farm site to the north. It is also noted that the larger more substantial former agricultural building within the site is not evident in backdrop views of the heritage asset. With this in mind, any future development within the site which is of a restrained scale and of a low density is unlikely to be evident, subject to its placement and the retention of natural screening along the southern edge of the site.

Listed buildings in wider vicinity

- 4.9** There is no inter-visibility between the Fengate Farm site and the Grade II listed 'Grove Farmhouse', which is located approx. 120 metres to the south-east. The farmhouse benefits from natural screening (east side of the Norwich Road), with extensive natural screening also located on the west side of the road. This hinders any visual connections between the heritage asset and the site.
- 4.10** To the north-east of the Fengate Farm site is a group of listed buildings at Bolwick Hall. These heritage assets are a considerable distance to the north-east of the site (between 290 and 310 metres approx.). The locations of these heritage assets combined with the existing natural screening along the east side of the Norwich Road, however, is such that future development within the Fengate Farm site would not impact on their settings, given the separation between them.

Streetscape of High Street, Old Norwich Road and Fengate Lane

- 4.11** High Street, which is located to the south of the Fengate Farm site, is characterised by a mix of 19th and 20th century development, which is mainly of two-storeys. While a number of these buildings make a positive contribution to the streetscape, the inter-visibility between them and the Fengate Farm site is hindered by existing vegetation along the southern edge of the latter. The majority of the existing development along the western end of High Street (north side) also sits at a raised level, which has the advantage of ensuring that, where future development does occur within the Fengate Farm site, it would not be perceived in backdrop views of the existing buildings.
- 4.12** The laneway along Fengate Lane, which adjoins the site to the north, comprises mainly later 20th century residential development with some 19th century buildings (altered) at its eastern end and to the north-west of the site (refer to figures 5-8). The Fengate Farm site is currently accessed from the laneway, with glimpsed views of the former agricultural buildings. With reference to the 19th century buildings, these have seen notable alteration over time although their original form is still discernible. In this regard, there is scope for future development to occur within the site, subject to it being sensitively site, of a restrained scale and utilising adequate natural screening.
- 4.13** The Old Norwich Road, which adjoins the Fengate Farm site to the east, includes a number of altered 19th century buildings such as the Plough Inn. These buildings benefit from existing natural screening at the rear, which hinders inter-visibility between them and the site. There is also more recent development to the south-west of the Plough Inn, which is evident in backdrop views of the Inn building.

HELAA conclusion	Further comments	Stage 7 – Settlement based appraisal of reasonable alternative sites and reason considered to be unreasonable
<p><i>This is a 3 ha site previously used as a poultry unit. That use ceased in 2011 and it's now vacant but a number of disused buildings from the former business remain on the site. The proposal is for residential development and it is located adjacent to the settlement limit. Initial Highways comments indicate that no access could be achieved of Fengate However, access off old Norwich Road subject to highway improvements could be an option. In addition, the site is within walking distance to Marsham Primary School, although the High Street is not paved throughout, also bus stop, village hall and local PH nearby. There are no insurmountable topographical issues affecting the site and the land is grade 3 agricultural land. Aylsham STW has no spare capacity, and the local sewerage network is almost at capacity. There are no surface water sewers in Marsham. It will require enhancement to the WRC treatment capacity. In terms of Biodiversity, the Norfolk Valley Fens SAC/Buxton Heath SSSI and Cawston and Marsham Heaths SSSI are within 3km, a CWS approx. 350m to the east. Bolwick Hall and its garden house and stable block, approx. 270 m to the north east. In conclusion, the site is considered suitable for the land availability assessment.</i></p>	<p><i>Development Management</i></p> <p><i>Site has recent history of refusals for similar scale of development in part in principle but also due to issues of access, visual impact, residential amenity due to contours of site and unsuitable location for scale of development (unsustainable). For these reasons the proposal is not considered suitable for further consideration.</i></p>	<p><i>This former piggeries site is well located in relation to the form and character of the settlement and was considered to be worthy of further investigation due to the benefits of redeveloping previously used land rather than a greenfield site. However, after careful consideration it is considered unreasonable for allocation as there has been a history of planning refusals in terms of access, visual impact and residential amenity. The site is not acceptable in highway terms as Fengate Lane is not of a sufficient standard to accommodate development traffic and the junction with the A140 poses a safety concern. The footway connection to Marsham Primary School is not continuous and it is not possible to improve this within the constraints of the highway</i></p>

Response

- 4.14** With reference to the 'Development Management' comments citing potential 'visual impact and unsuitable location for scale of development', it is considered that there is scope for development to occur within the Fengate Farm site.
- 4.15** The heritage impact assessment in paragraphs 4.5-13 above has established that while there are some heritage sensitivities, this should not prevent development occurring within the site. Subject to potential future development being sensitively sited, of a restrained scale and utilising adequate natural screening, the significance and setting of the heritage assets identified would not be adversely impacted. In this regard, and subject to the relevant mitigative measures being utilised, there are no heritage constraints that would prevent the site from being brought forward for allocation for development purposes.

- 4.16** The Marsham Booklet specifically mentions the Grade I listed All Saints Church, which is located to the east of the Land South of Le Neve Road site.

Listed buildings in immediate vicinity

- 4.17** Those heritage assets in close proximity to the site include the Grade I listed All Saints Church and the Grade II listed Old Rectory, both located to the east of the site.
- 4.18** The All Saints Church building has prominence in surrounding views, including those from Norwich Road and the site. The open nature of the agricultural fields to the west and south-west contribute to the open setting of the heritage asset, with the church tower having prominence from these vantage points (there is an extensive network of public tracks in these areas). The church tower is also evident in views from the western end of High Street, Marsham and is largely unimpeded visually from this vantage point. The allocation of the Land South of Le Neve Road site to accommodate 25-35 dwellings and an extension to the cemetery, has the potential to visually impede the views noted, which would impact on the landmark qualities and setting of the heritage asset. The views noted contribute to the semi-rural setting of the heritage asset.
- 4.19** It is also noted that Historic England has objected to the allocation of this site, citing the following reasons:

Sensitive site in terms of the potential impact upon multiple heritage assets, some of which are highly graded. We therefore have some concerns about the allocation of this site. Whilst there are no designated heritage assets within the site boundary, there are a number of listed buildings to the east of the site including the grade I listed Church of All Saints and the grade II listed Old Rectory, Colenso Cottage and Marsham War Memorial.

Suggest a more detailed Heritage Impact Assessment be undertaken to assess the impact of the proposed development upon the significance of these heritage assets, to establish the suitability or otherwise of the site and to establish appropriate mitigation and enhancement should the site be found suitable. If the site is found suitable, the findings of the HIA should then inform the policy wording.

It might also be helpful to illustrate proposed mitigation in the form of a concept diagram for the site e.g. showing where open space and landscaping would be located.

- 4.20** We concur with the reasoning behind the above objection, given that any future development within the site will cause some harm to the setting of All Saints Church, in particular. Even with implementation of mitigative measures, such as landscaping, any new development is likely to be perceived in the views noted above.
- 4.21** Site Assessment 13 – Historic Environment of GNLP: Regulation 18(C) also concludes that the proposed development at Site Option GNLP2143 – Land to South of Le Neve Road would have a major negative impact on the setting of the All Saints Church.
- 4.22** The Old Rectory is less prominent visually, given its more restrained two-storey scale and set back from the Norwich Road. Its south elevation is partially evident from the churchyard that adjoins it to the south, although the existing brick wall partially conceals the heritage asset from this vantage point. The views of the heritage asset are also impeded from agricultural fields to the west and south-west. While there would be some harm associated with future development on the site on the setting of the heritage asset, this would likely be at the lower end of the harm scale for the reasons cited.

- 4.23** Colenso Cottage has a high degree of prominence in views from the Norwich Road, located to the east. The agricultural fields that adjoin the heritage asset to the south and west contribute to its rural setting. In this regard, any future development on the site has the potential to impact on the setting of the heritage asset, given that it may be visible in backdrop views of the cottage.
- 4.24** The setting of the Marsham War Memorial, which is located close to the east elevation of All Saints Church, is unlikely to be impacted by future development within the site (subject to it being of a restrained scale and utilising adequate landscape buffers and natural screening).

Marsham Booklet extract (Regulation 18 Assessment)

HELAA conclusion	Further comments	Stage 7 – Settlement based appraisal of reasonable alternative sites and reason for allocating
<p><i>The site lies to the south of Marsham village, south of Croft Lane, it overlays a previously promoted site and is proposed for residential development and extension to the adjacent cemetery. Initial evidence suggests the Highways Authority support the site, and it has access to bus services and Marsham Primary School but is also close to listed buildings including the church. Sewerage infrastructure upgrades would be required to serve growth in this location and local wastewater treatment capacity is known to be very limited. There is a SAC and two SSSIs within 3km which may require mitigation. Development would not result in the loss of any locally protected public open space or high quality agricultural land, and there is no known constraint from utilities infrastructure, contamination or flood risk. Subject to the above constraints being mitigated, in principle the site is considered suitable for the land availability assessment. However, as it overlaps site GNLPO229, it will not be counted to avoid duplication and will therefore be marked as unsuitable.</i></p>	<p><i>Development Management</i></p> <p><i>Likely ok from landscape perspective. Need Heritage Officer view on impact of setting of church.</i></p>	<p><i>This is the only site considered suitable for allocation in Marsham. It is allocated subject to vehicular access via Le Neve Road.</i></p> <p><i>Development will need to respect the setting of the adjacent Grade I listed church and provide an extension to the cemetery if required.</i></p>

Response

- 4.25** It is noted that comments from Council's Heritage Officer have not been included in the above assessment. The proximity of the potential allocation site to a number of heritage assets, of which All Saints Church benefits from the highest Grade I listing status, raises a number of heritage sensitivities. The heritage asset is prominent in surrounding views including those from Norwich Road and the site. The open nature of

the agricultural fields to the west and south-west contribute to the open setting of the heritage asset, with the church tower having prominence from these vantage points. As noted, any future development within the site is highly likely to adversely impact the setting and landmark qualities of the church tower, in particular. Even with appropriate mitigative measures, such as the utilisation of landscape buffers and natural screening, it is considered that between 25 and 35 residential units on this site will be perceived in the key views of the church, particularly from the west and south-west.

5.0 Summary and conclusions

- 5.1** A heritage impact assessment of Site Options GNLP2143 - Land South of Le Neve Road (preferred option) and GNLP3035 - Fengate Farm (alternative option), both located on the edge of the Marsham settlement, has been carried out to determine if we concur with the conclusions and recommendations reached. Both are included in the evolving Greater Norwich Local Plan (GNLP) and are assessed in the Draft GNLP Sites document (Marsham Booklet – Regulation 18 Assessment). The assessments included in the Draft GNLP Sites document identified the GNLP2143 – South of Le Neve Road as the preferred option. GNLP 3035 – Fengate Farm was identified as an unreasonable site. The Draft GNLP Sites document has been reviewed and outlines the potential impacts that future development of the two site options would have, including on the settings of those heritage assets located in the vicinity of each site.
- 5.2** The main conclusion with reference to the GNLP3035 - Fengate Farm site is that future development could occur, should it come forward for allocation. Where development does occur, however, the design approach will require careful consideration to ensure that the settings of nearby heritage assets are not impacted visually. These measures should include sensitively sited development, which is of a restrained scale with adequate landscaped buffers and natural screening introduced, particularly along the eastern and southern boundaries. Subject to these measures being utilised, the settings of the nearby heritage assets identified, which include ‘The Willows’ and the ‘Village Hall’, would not be adversely impacted by future development within the site. In this regard, there are no heritage constraints that would prevent the site from being brought forward for allocation for development purposes.
- 5.3** The heritage constraints associated with the GNLP2143 – Land South of Le Neve Road site are considered greater. The proximity of the potential allocation site to a number of heritage assets, which include the Grade I listed All Saints Church, raises a number of heritage sensitivities. Any future development within the site is highly likely to adversely impact the setting and landmark qualities of the church tower, in particular. Even with appropriate mitigative measures, such as the utilisation of landscape buffers and natural screening, it is considered that between 25 and 35 residential units on this site will be perceived in the key views of the church, particularly from the west and south-west (there is an extensive network of public tracks in these areas). The All Saints Church building has prominence in surrounding views, including those from Norwich Road and from the potential allocation site. The open nature of the agricultural fields to the west and south-west contribute to the open setting of the heritage asset, with the church tower having prominence from these vantage points. The church tower is also evident in views from the western end of High Street, Marsham and is largely unimpeded visually from this vantage point. The allocation of the Land South of Le Neve Road site to accommodate 25-35 dwellings and an extension to the cemetery, has the potential to visually impede the views noted, which would impact on the landmark qualities and setting of the heritage asset. The views noted contribute to the semi-rural setting of the heritage asset.
- 5.4** In heritage terms, it is our opinion that the GNLP3035 – Fengate Farm site is less sensitive. The potential heritage impacts associated with the GNLP2143 – Land South of Le Neve Road site are considered greater, with any future development within this site likely to adversely impact the semi-rural setting and landmark qualities of the Grade I listed All Saints Church, in particular.

Sources

Cartographic: Ordnance Survey

1885-7 Ordnance Survey Map

1907 Ordnance Survey Map

1950 Ordnance Survey Map

1973-9 Ordnance Survey Map

2000 Ordnance Survey Map

2006 Ordnance Survey Map

2020 Ordnance Survey Map

Websites

Heritage Gateway - www.heritagegateway.org.uk

Historic England - The National Heritage List for England - historicengland.org.uk/listing/the-list