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11. INTRODUCTION

- 11.1 This chapter of the Environmental Statement (ES) considers the potential impact of the development proposal on the Historic Environment. In particular, it considers the likely significant effects of the Proposed Development on designated and non-designated heritage assets.
- 11.2 This chapter describes the scope, relevant legislation, assessment methodology and the baseline conditions currently existing at the Site and its surroundings. It then considers any potential significant environmental impacts the Proposed Development would have on this baseline environment, the mitigation measures required to prevent, reduce or offset any significant adverse impacts and the likely residual impacts after these measures have been employed.

METHODOLOGY

- 11.3 The relevant legislation, policy and guidance are listed below.

Legislation

- 11.4 The applicable legislative framework is summarized as follows:
- Ancient Monuments and Archaeological Areas Act, 1979; and
 - Planning (Listed Buildings and Conservation Areas Act), 1990.

Policy

- 11.5 Applicable national policy comprises the National Planning Policy Framework (2021), and specifically the following paragraphs:
- 11.6 Paragraph 194
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.
- 11.7 Paragraph 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.

11.8 Paragraph 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.*

11.9 Paragraph 202

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

11.10 Paragraph 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.

11.11 Applicable local planning policy comprises the following:

- West Suffolk Local Plan (consisting of the former Forest Heath and St Edmundsbury areas)¹
- South Cambridgeshire Local Plan (Adopted 2018)²
- Suffolk Minerals & Waste Local Plan (adopted 2020)

11.12 Relevant policies comprise the following:

¹ https://www.westsuffolk.gov.uk/planning/Planning_Policies/local_plans/west-suffolk-local-plan-former-forest-heath-and-st-edmundsbury-areas.cfm

² Note, while the development is located wholly within West Suffolk there is still the possibility of indirect impact on the settings of assets within South Cambridgeshire, so relevant policies have been included here.

Forest Heath and St Edmundsbury Local Plan: Joint Development Management Policies Document (Feb 2015)

11.13 Policy DM15 – Listed Buildings

Proposals to alter, extend or change the use of a listed building, or development affecting its setting, will be permitted where they:

- a) demonstrate a clear understanding of the significance of the building and/or its setting, alongside an assessment of the potential impact of the proposal on that significance;...*
- d) are of an appropriate scale, form, height, massing, and design which respects the existing building and its setting;...*
- g) respect the setting of the listed building, including inward and outward views;*
- h) respect the character or appearance of a park, garden or yard of historic or design interest, particularly where the grounds have been laid out to complement the design or function of the building. A curtilage and/or setting which is appropriate to the listed building, and which maintains its relationship with its surroundings should be retained; and...*

... All development proposals should provide a clear justification for the works, especially if these works would harm the listed building or its setting, so that the harm can be weighed against any public benefits. The level of detail of any supporting information should be proportionate to the importance of the building, the works proposed and sufficient to understand the potential impact of the proposal on its significance and/or setting.

11.14 Policy DM17: Conservation Areas

Proposals for development within, adjacent to or visible from a Conservation Area should:

- a) preserve or enhance the character or appearance of the Conservation Area or its setting, and views into, through, and out of the area; ...*
- b) be of an appropriate scale, form, height, massing, alignment and detailed design which respect the area's character and its setting; ...*
- g) demonstrate a clear understanding of the significance of the Conservation Area and/or its setting, alongside an assessment of the potential impact of the proposal on that significance. The proposal should demonstrate how the key characteristics of the character area have been addressed.*

All development proposals should provide a clear justification for the works, especially if these works would harm the significance of a Conservation Area or its setting, so that the harm can be weighed against any public benefits. The level of detail of any supporting information

should be proportionate to the importance of the area, the works proposed and sufficient to understand the potential impact of the proposal on its significance and/or setting.

11.15 Policy DM20: Archaeology

Development will not be acceptable if it would have a material adverse effect on Scheduled Ancient Monuments or other sites of archaeological importance, or their settings.

On sites of archaeological interest, or of potential archaeological importance, provided there is no overriding case against development, planning permission will be granted subject to satisfactory prior arrangements being agreed.

This will include one or a combination of the following:

- *an appropriate desk based assessment and/or field evaluation of the archaeological interest or significance prior to determination.*
- *the preservation of archaeological remains in situ;*
- *the adequate recording of the heritage asset by archaeological investigation before development commences (preservation by record).*

South Cambridgeshire Local Plan (Adopted 2018)

11.16 Policy NH/14: Heritage Assets

Development proposals will be supported when:

- a) They sustain and enhance the special character and distinctiveness of the district's historic environment including its villages and countryside and its building traditions and details;*
- b) They create new high quality environments with a strong sense of place by responding to local heritage character including in innovative ways.*

2. Development proposals will be supported when they sustain and enhance the significance of heritage assets, including their settings, as appropriate to their significance and in accordance with the National Planning Policy Framework, particularly:

- c) Designated heritage assets, i.e. listed buildings, conservation areas, scheduled monuments, registered parks and gardens;*
- d) Non-designated heritage assets including those identified in conservation area appraisals, through the development process and through further supplementary planning documents;*
- e) The wider historic landscape of South Cambridgeshire including landscape and settlement*

patterns;

- f) Designed and other landscapes including historic parks and gardens, churchyards, village greens and public parks;*
- g) Historic places;*
- h) Archaeological remains of all periods from the earliest human habitation to modern times.*

Suffolk Minerals & Waste Local Plan (adopted 2020)

11.17 Policy GP4: General environmental criteria

Minerals and waste development will be acceptable so long as the proposals, adequately assess (and address where applicable any potentially significant adverse impacts including cumulative impacts) on the following...

- f) Historic environment, archaeology, heritage assets, and their setting;*

11.18 Policy WP 17: Design of waste management facilities

Waste management facilities will be considered favourably where they incorporate...

- d) measures which will protect, preserve and where practicable enhance the natural, and historic environment including the setting, landscape and built environment...*

Guidance

11.19 The applicable guidance is summarized as follows:

- National Planning Practice Guidance (DCLG 2014, as updated);
- Principles of Cultural Heritage Impact Assessment in the UK (IEMA, IHBC & CIfA 2021);
- Statements of Heritage Significance: Analysing Significance in Heritage Assets Historic England Advice Note 12; and
- The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 (Historic England 2017).

Scoping

11.20 Scoping was initially undertaken in November 2022. In accordance with the Scoping Report, this Chapter assesses the potential for significant effects to buried archaeological remains and the potential for significant effects to the heritage assets through setting change.

Consultation

11.21 Table 11-1 provides a summary of the consultation activities undertaken in support of the preparation of this Chapter.

Table 11-1
Consultations

Organisation	Individuals	Meeting/Form of Consultation	Summary Outcome
Suffolk HER	SLR staff LPA HER Officer	Access to Heritage Records	Conclusions as outlined in this chapter
Cambridgeshire HER	SLR staff LPA HER Officer	Access to Heritage records	Conclusions as outlined in this chapter

Assessment Methodology

Study Area

11.22 For the purposes of archaeological baseline data collection, a 1km study area was utilised for heritage assets of an archaeological nature to establish the archaeological potential within the Site. A 250m radius was utilised around the pipeline and lagoon.

11.23 For the purposes of a settings assessment a search area of 1km was selected. For the purposes of setting the lagoon and pipeline have been excluded as they are to be buried underground and will not have the capacity to impact setting.

Sensitivity Criteria

11.24 Table 11- sets out the sensitivity criteria for the Historic Environment.

Table 11-2
Sensitivity criteria³

Sensitivity	Definition
Very High	Very high importance and rarity, international scale and very limited potential for substitution <ul style="list-style-type: none"> World Heritage Sites

³ Adapted from DMRB (2020) LA 104 Environmental Assessment and Monitoring

Sensitivity	Definition
High	<p>High importance and rarity, national scale, and limited potential for substitution</p> <ul style="list-style-type: none"> Assets described as being of the 'highest significance' within the NPPF (paragraph 200) <ul style="list-style-type: none"> Scheduled Monuments Registered Battlefields Grade I and II* Listed Buildings Grade I and II* Registered Parks and Gardens Conservation Areas including a high number of Grade I and II* Listed Buildings Archaeological remains of demonstrable equivalence to a Scheduled Monument
Medium	<p>Medium or high importance and rarity, regional scale, limited potential for substitution</p> <ul style="list-style-type: none"> Grade II Listed Buildings Other Conservation Areas Grade II Registered Parks and Gardens Archaeological remains contributing to regional research frameworks
Low	<p>Low or medium importance and rarity, local scale</p> <ul style="list-style-type: none"> Locally listed buildings Other archaeological remains
Negligible	<p>Very low importance and rarity, local scale</p>

11.25 The criteria that have been used to assess the magnitude of the impacts are defined in Table 11-1.

Table 11-1
Magnitude of Change (Impact) Criteria⁴

Magnitude		Definition
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

⁴ DMRB (2020) LA 104 Environmental Assessment and Monitoring

Magnitude		Definition
Negligible	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
No change		No loss or alteration of characteristics, features or elements; no observable impact in either direction

Significance of Effect

- 11.26 The sensitivity of the receiving environment together with the magnitude of the impact defines the significance of the potential effect, as identified within Table 11-2.

Table 11-2
Level of Effect Matrix⁵

		Magnitude of Impact				
Sensitivity		No change	Negligible	Minor	Moderate	Major
	Very high	Neutral	Slight	Moderate or large	Large or very large	Very large
	High	Neutral	Slight	Slight or moderate	Moderate or large	Large or very large
	Medium	Neutral	Neutral or Slight	Slight	Moderate	Moderate or large
	Low	Neutral	Neutral or Slight	Neutral or slight	Slight	Slight or moderate
	Negligible	Neutral	Neutral	Neutral or slight	Neutral or slight	Slight

- 11.27 These terms are summarized below.

- Very Large Effect: effects at this level are material in the decision-making process – significant effects.
- Large Effect: effects at this level are likely to be material in the decision-making process – likely significant effects.

⁵ DMRB (2020) LA 104 Environmental Assessment and Monitoring

- Moderate Effect: Effects at this level can be considered to be material decision-making factors - – possible significant effects.
- Slight Effect: Effects at this level are not material in the decision-making process – insignificant effects.

- 11.28 In concluding the likelihood of a significant effect, professional judgement is considered. The effect on the cultural heritage resource is not significant when the impact does not substantially diminish the heritage interest of the cultural heritage resource (DMRB)⁶.
- 11.29 The characteristics of the impacts are described in terms of adverse/beneficial, direct/indirect, temporary (reversible)/permanent (irreversible), together with timescales where appropriate (short, medium, long term).

Limitations and Assumptions

- 11.30 The prediction of direct impacts has been prepared with regard to a baseline including all standard desk-based resources. Whilst the lack intrusive fieldwork could be regarded as a limitation, the baseline assessment is considered reasonably reflective of the archaeological potential of the footprint of the Proposed Development. The assessment of in-direct (setting) effects was also undertaken using all standard desk-based resources.

BASELINE CONDITIONS

- 11.31 An Historic Environment Desk Based Assessment has been undertaken to assess the potential effect of the proposals on heritage assets. This is appended in full to this chapter, see Appendix 11.A. Pertinent points are summarised below.
- 11.32 The overall archaeological potential for the Site is generally low, with the exception of possible remains associated with the World War Two airfield RAF Wrattling Common (**CB15159**) and the possible route of *Worsted Street* Roman Road (**MCB9602/07970**).
- 11.33 The possible location of *Worsted Street* (07970 and WTH 007) on the HER places it partially within the boundary of the Anaerobic Digestion (AD) facility, with the pipeline crossing it. However, the recorded route is conjectural and the geophysical survey does not provide strong evidence for the presence of a road, albeit it may have been affected by ‘noise’ along the northern boundary and a single linear was recorded which may be associated with a roadside field boundary or (if it is the road itself) evidence suggestive that the road has been truncated (due to a general lack of associated response).
- 11.34 There is the high potential for archaeological remains associated with RAF Wrattling Common (**CB15159**) within the vicinity of the proposed lagoon and northern portion of the pipeline. Well documented on maps and aerial photographs, the Site is located over at least two former Nissan Huts used as bomb stores, the footprints of which are still partially visible on LIDAR and aerial

⁶ DMRB (2020) LA 106 Cultural Heritage:20

photography. With the airfields demolition, any surviving remains would likely consist of the buried remains of the roads, building foundations and hardstanding.

- 11.35 The potential for prehistoric remains is considered low, with only one feature, a possible ring ditch (**WTH 005**), identified in proximity to the Site, and only scattered isolated find spots in the wider area.
- 11.36 There is a negligible/nil chance of Anglo-Saxon to Early Medieval features, with only one metal detected strap-end fragment (**WTH 026**) located within the footprint of the pipeline. All other recorded evidence is centred around Haverhill to the southeast, with no spatial pattern or correlation that would link them to the Site.
- 11.37 A low chance for medieval features is identified, with medieval features, consisting of Horseheath Park (**MCB17529**) and Limbery Moat (**01170**) located close to the Site, though any associated remains would be likely agricultural (field boundaries etc.)
- 11.38 Other features within the Site may include post-medieval/modern agricultural remains, such as field boundaries, which are evidenced on historic mapping and shown on LIDAR and aerial photographs.
- 11.39 Within the southern portion of the Site Boundary, there is the potential for remains associated with the Stour Valley railway (**SUF 075**) and Spring Grove Farm (**WTH 055**), though both have been disturbed by later development, and are located in an area not to be disturbed as part of the design.
- 11.40 The archaeological baseline has concluded there is the potential for the Proposed Development to impact on archaeological remains within the Site.
- 11.41 The Heritage Baseline, in accordance with the Historic England Good Practice in Planning Advice Note 3 'The Setting of Heritage Assets' (2017) and Advice Note 12 'Statements of Heritage Significance' (2019), identified potential impact through settings change from the development on one asset (full methodology outlined in the baseline report in **Appendix 11.A**):
- Silver Street Farmhouse (**NHLE 1236109**)

ASSESSMENT OF EFFECTS

- 11.42 The Proposed Development has the potential to result in both direct (onsite) and indirect (offsite) impacts upon heritage assets. The potential effects described below are those that have been identified within Appendix 11.A.

Receptors and Sensitivity

Onsite

- 11.43 The baseline presented within Appendix 11.A identified the following potential archaeological buried remains within the boundary of the Proposed Development:
- Worsted Street Roman Road (WTH 007/07970);
 - RAF Wratting Common (CB15159);
 - Post-medieval field boundaries and footpaths;

- Other remains, consisting of geophysical anomalies detected, that may or may not be archaeological in origin, but were not clearly identifiable as features.

11.44 If present, these potential buried remains would be of **low** importance ('sensitivity'), with the exception of Worsted Street (CB15159), which would be of **medium** importance due to its potential ability to contribute to the East of England Regional Research Framework (2021).⁷

Offsite

- 11.45 The following sensitive potentially receptors are located within the vicinity of the Proposed Development and could be sensitive to setting change.
- Silver Street Farmhouse (NHLE 1236109). This asset is of medium importance ('sensitivity').

Operational Phase Effects

Onsite

- 11.46 The proposals involve groundworks that would remove any potential buried remains within the footprint of the works. In the worst case the magnitude of impact would therefore be **major adverse**. The overall significance of effect to any remains would be no greater than **moderate adverse** based on the expected archaeological importance of such remains as set out in the baseline.

Offsite

Silver Street Farmhouse (NHLE 1236109).

- 11.47 Silver Street Farmhouse is a Grade II listed building, and would be of medium importance/sensitivity for EIA purposes. Its sensitivity derives primarily from its historic and architectural interest, with contributing factors to its setting including the farmstead within which it is located and the wider rural landscape, though both aspects of the setting have been heavily altered since the building was constructed.
- 11.48 It was identified within the heritage assessment (Appendix 11.A) that the proposed development would result in a minor change to the wider rural landscape within which the asset is set, and possible minor changes to the peripheral views to the south from the asset. However, development would not affect the understanding and appreciation of the asset within the immediate setting of its farmstead, the understanding of important setting elements on approaches to the asset, or intervisibility between the asset and remaining elements of the pre-18th century landscape within which the asset is appreciated and understood. The location of the Site in comparison to the asset, as well as the screening caused by the topography and vegetation (existing and planned) means that there would not be intervisibility between the asset, and development from key approaches from the south, nor would any important views to and from the asset be affected. It was therefore

⁷ LIA-Rom 10: Can we map the development of Late Iron Age and Roman roads?

identified that the asset would experience **no harm** as a result of changes to the wider setting, and therefore there would be no adverse effect on the asset.

MITIGATION

Archaeology

- 11.49 Archaeological investigation works on the Site to date have consisted of geophysical survey undertaken in the eastern field of the proposed AD facility. Further geophysical survey of the western field, the route of the pipeline, and the lagoon, may provide further information as to the possible archaeological remains within the Site.
- 11.50 Further investigative works around the possible location of Worsted Street Roman Road (**WTH 007/07970**) and RAF Wrattling Common (**CB15159**) through trial trenching would confirm whether or not archaeological remains are present and in what condition. These works would inform any further necessary archaeological mitigation (if any is needed at all).

Heritage

- 11.51 Vegetation screening has been included as part of the proposed development design, and will contribute to minimising any potential indirect effect on heritage assets. As no harm has been identified to any heritage assets as a result of the proposed development, no further mitigation is required.

RESIDUAL EFFECTS

Archaeology

- 11.52 Residual effects with regard to the buried archaeological resource would remain as stated above. However, they should be considered against the outcome of any archaeological recording. Archaeological reporting would be made available to the public and academic communities such that the removal of buried archaeological remains would release heritage capital through the provision of an otherwise hidden educational resource. This could be a potential public benefit.

Heritage

- 11.53 Residual impacts with regard to heritage would remain as stated above, with the visual effects of the changes to Silver Street Farmhouse resulting in **no harm**, with no adverse effect on the asset.

ASSESSMENT OF CUMULATIVE EFFECTS

- 11.54 When considering likely significant cumulative effects, this assessment has considered the following:
- Inter-cumulative effects (i.e. those that occur as a result of the Proposed Development in combination with other developments).

- 11.55 The 'other developments' includes any development that is known within the planning system and any development where construction has yet to commence. Where construction has commenced, the other development is considered to be part of the existing baseline conditions.

Inter-cumulative Effects

- 11.56 In terms of archaeological sites, cumulative impacts will principally arise where each development removes individual areas of preserved archaeological remains resulting in a gradual erosion and fragmentation of the total archaeological resource of the region. Development would contribute to the cumulative physical loss of archaeological remains from development in general within the region. However, in all cases of development, including that at the Site, this would be offset by the contribution made to archaeological understanding of the area through evaluation/excavation and recording.
- 11.57 In terms of setting impacts the committed developments, considered in respect to cumulative effects to the setting of heritage assets comprise:
- The construction of 145 dwellings and associated infrastructure and open space, Land West Of Three Counties Way, Three Counties Way, Withersfield. Suffolk (**DC/22/0469/RM**);
 - Demolition of 2 No. existing agricultural chicken sheds and construction of a single storey detached dwelling (**21/02788/FUL**)
- 11.58 None of the above schemes would affect the heritage assets identified above. As such, there would be no cumulative impacts as a result of setting change.

SUMMARY OF EFFECTS

- 11.59 There are potential archaeological remains located within the Site. Of highlight is the possible route of *Worsted Street* Roman Road (**07970** and **WTH 007**), which may run over the northern boundary of the AD facility, and the remains associated with RAF Wrattling Common (**CB15159**). The extent and condition of remains is presently unknown.
- 11.60 Other remains within the Site may include medieval/post-medieval agricultural remains, primarily former field boundaries, as well as footpaths. The possibility for other unknown remains exists as well.
- 11.61 The effect to all known and potential buried archaeological remains due to the proposed development is considered to be to be **Not Significant** in terms of EIA.
- 11.62 It is expected that any mitigation required for direct impacts could be undertaken as a condition to consent, most likely further investigation of possible features, and the recording of any archaeological remains (should they be present).
- 11.63 Possible indirect impact was identified for one designated heritage asset, Silver Street Farmhouse (NHLE 1236109), a Grade II listed building.
- 11.64 It was assessed that only minor changes to the wider agricultural landscape would result from the proposed development, and that **no harm** would be caused to the asset or any of the key contributors to its setting. The effect to this asset is considered to be **Not Significant** in terms of EIA.

11.65 Screening has already been proposed as part of the design for the proposed development, and this will contribute to minimising any possible effect on heritage. No additional mitigation is proposed in consideration to indirect effects.

11.66 No cumulative effects have been identified.