

# Anglia Square, Norwich

## Environmental Statement **Chapter 8: Archaeology**

CgMs Heritage, part of the RPS  
Group, on behalf of  
Weston Homes Plc and Columbia  
Threadneedle

Author Name: Duncan Hawkins  
Tel: 020 7583 2231  
Email: [duncan.hawkins@cgms.co.uk](mailto:duncan.hawkins@cgms.co.uk)

March 2018

**Iceni Projects Ltd**  
Flitcroft House 114-116 Charing Cross Rd, London WC2H 0JR  
T 020 3640 8508 F 020 3435 4228 W [iceniprojects.com](http://iceniprojects.com)

## 8. CHAPTER 8: ARCHAEOLOGY

### INTRODUCTION

#### Purpose

---

- 8.1 This Chapter has been produced by CgMs Heritage, part of the RPS Group. CgMs Heritage are one of the largest heritage teams within the UK with a proven track record relating to the successful delivery of sustainable major urban developments involving effects on archaeology, both within London – including the recent Sugar Quay development - and also other cities across the country, including the French Quarter, Southampton, the Bath Southgate development and the Westgate, Oxford development. The Westgate redevelopment project was awarded “Best Archaeological Project” at the national British Archaeological Awards in 2016. The archaeological team lead for the Anglia Square project has over 20 years’ experience in the heritage sector and is a Full Member of the Chartered Institute for Archaeologists (the UK’s leading professional body for archaeologists) and is also a Fellow of the Society of Antiquaries of London.
- 8.2 The chapter summarises relevant legislation, policy and guidance and describes the methods used to gather baseline information and assess impacts. It then presents a summary of the currently available baseline archaeological information, including an assessment of the potential for previously unrecorded archaeological remains to be present, drawing upon an Archaeological Impact Assessment prepared in 2016 (**Appendix 8.1**). This assessment of potential is further informed by an examination of the building plans for the construction of the current Anglia Square development, held in the Norwich Record Office.
- 8.3 This chapter of the ES assesses the likely significant effects of the proposed Development upon Archaeological remains and is supported by the Archaeological Impact Assessment provided in **Appendix 8.1**. The potential effects of the proposed development upon the significance of archaeological assets as a result of physical loss or change in setting during the construction and post construction phases are assessed and mitigation measures proposed as appropriate. Residual effects following the implementation of mitigation measures are then assessed, along with the cumulative effects associated with the proposed Development in combination with surrounding development activity.
- 8.4 This chapter has been prepared following discussions with the City of Norwich’s archaeological advisors at Norfolk County Council, who have agreed the scope of this assessment, which utilises a study area extending 250m from the site boundary. Earlier proposed schemes on the site have been supported by archaeological evaluation, the results of which are incorporated in the Archaeological Impact Assessment.

## Characteristics

---

- 8.5 The Site lies within the City of Norwich to the north of St Crispin's Road, bounded by Magdalen Street to the east, Edward Street to the north and Pitt Street and New Botolph Street to the west, and is centred on NGR TG 2302 0935. The main part of the Site, known as Anglia Square, comprises a complex of retail, leisure and office buildings, a multi storey car park and two open car parking areas, with a group of older commercial buildings and a modern chapel at the southwest corner. There are two separate parts to the Site, being parcels of land to the north and west of Edward Street. The entire Site measures approximately 4.51 hectares in extent.

## Background

---

- 8.6 The Site is situated in the north part of Norwich City Centre, within the Medieval city walls constructed in the thirteenth century and has experienced ongoing development in some form over the course of over 1400 years. By the start of the twentieth century the Site comprised a dense urban townscape of both residential and industrial buildings and spaces. The trend for locating industrial buildings in this area continued through the first half of the twentieth century with large areas cleared for factories and works. Up until the mid-twentieth century the streetscape included Boltolph Street, passing from the southern end of St Augustine Street as it exists in the present day, moving in a south easterly direction to join with Magdalen Street. Extending southwards from Boltolph Street were St George's Street and Calvert Street, both of which still survive to the south of the flyover.
- 8.7 At least three bomb strikes are known to have dropped within the Site during the Second World War. In 1945, just before the War ended, the City of Norwich Plan was prepared for, and published by, the City of Norwich Corporation. Central to the regeneration proposals was the Inner Link Road, which was designed to direct traffic around the city centre. Large scale clearance was required to allow the construction of the flyover for St Crispin's Road that now marks the southern boundary of the Site, erasing the former historic streetscape. The Site itself was reserved for the Anglia Square scheme, although the wider intended development was never fully realised.
- 8.8 The opportunity now exists to address what has been an underutilised area of poor quality townscape for almost 50 years, and finally realise the original mid-twentieth century ambitions for the comprehensive redevelopment of the entire Site, but with a mixed use scheme appropriately integrated into its surroundings in terms of, for example, connectivity, external-facing active frontages to the surrounding roads, and scale relative to adjoining townscape, that delivers a range of heritage and public benefits.
- 8.9 The Site is generally relatively flat, sloping slightly from north west (c. 5.5m aOD) to south east (c. 4.4m aOD). The natural topography of the Site is thought to have been more undulating, but has been levelled by human development and activity.

## Study Area

---

- 8.10 For the purposes of the baseline assessment, a Study Area was drawn to include all designated and non-designated archaeological assets within a 250m radius of the Site boundary. This Study Area was agreed following consultations with the archaeological advisors to Norwich City Council.

## Proposals

---

- 8.11 Full details of the proposed Development are provided in Chapter 5, and are only summarised here.
- 8.12 Proposals for the Site comprise demolition of all existing buildings, excepting Gildengate House and its associated podium block which would be retained, remodelled and reclad to improve its outward appearance. Demolition would also include 43/45 Pitt Street, a locally listed building.
- 8.13 New buildings would be constructed on all three parts of the Site, ranging from 2 to 12 storeys in height, with a tower element of 25 storeys. The blocks would be arranged to form 6 distinct areas of built form, set out around two new principal north-south and east-west pedestrian/cycle routes running across the Site, and focussed on two public open spaces, one of which would be a retained and improved Anglia Square along with a new public space to the west.
- 8.14 Blocks A, D, E and H of the proposed Development have been aligned along the historic course of Botolph Street. This would deliver a high quality pedestrian link between Magdalen Street and St Augustine Street / Pitt Street, successfully reconnecting St Augustine Street with Norwich City Centre and better revealing the lost historic network of streets that were swept away by post war clearance. The block alignment for the Site would also reveal the lost line of St George Street to the north of St Crispins Road.
- 8.15 Anglia Square and St George Square would represent impressive public spaces and nodal points within the proposed Development, capturing views towards St Augustine's Church and also the Cathedral tower and spire at various points.
- 8.16 The likely impact of the proposed Development, particularly on buried archaeological remains within the Site, will be mixed. With the exception of the proposed cinema, there are no proposed basement levels in the development which would completely remove archaeological remains within their extents. Pile clusters will vary in density across the Site. Where piling is proposed at 2% - 5% by area, archaeological remains at depth can be preserved *in situ*, Where particular buildings require higher density pile cores, or there are specific impacts such as lift shafts and the lowest part of the raked floor of the cinema, requiring areas of deeper excavation, there is likely to be a high impact on buried archaeological remains.

## POLICY CONTEXT

### Legislation

---

- 8.17 Legislation regarding archaeology, including scheduled ancient monuments, is contained in the Ancient Monuments and Archaeological Areas Act 1979, amended by the National Heritage Act 1983 and 2002, and updated in April 2014. This act protects the fabric of Scheduled Monuments, but does not afford statutory protection to their settings.

### National Policy

---

- 8.18 In March 2012, the Government published the National Planning Policy Framework (NPPF), which replaced previous national policy relating to heritage and archaeology.

#### National Planning Policy Framework (2012)

Section 12 of the NPPF, entitled 'Conserving and enhancing the historic environment' provides guidance for planning authorities, property owners, developers and others on the conservation and investigation of heritage assets. Overall, the objectives of Section 12 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.

- 8.19 Section 12 of the NPPF recognises that intelligently managed change may sometimes be necessary if heritage assets are to be maintained for the long term. Paragraph 128 states that planning decisions should be based on the significance of the heritage asset, and that the level of detail supplied by an applicant should be proportionate to the importance of the asset and should be no more than sufficient to review the potential impact of the proposal upon the significance of that asset.

- 8.20 Heritage Assets are defined in Annex 2 of the NPPF as: 'a building, monument, site, place, area or landscape positively identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. They include designated heritage assets (as defined in

the NPPF) and assets identified by the local planning authority during the process of decision-making or through the plan-making process.’

8.21 Annex 2 also defines Archaeological Interest as a ‘heritage asset which holds or potentially could hold evidence of past human activity worthy of expert investigation at some point. Heritage assets with archaeological interest are the primary source of evidence about the substance and evolution of places, and of the people and cultures that made them.’

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

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

- In specific relation to designated heritage assets paragraph 133 of the NPPF states that, 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 loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:
- the nature of the heritage asset prevents all reasonable uses of the site; and;
- no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
- conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and the harm or loss is outweighed by the benefit of bringing the site back into use.

8.24 Paragraph 134 states that, 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 securing its optimum viable use.

8.25 Paragraph 135 states that, the effect of an application on the significance of an undesignated 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 assets.

8.26 In short, government policy provides a framework which:

- Protects nationally important designated Heritage Assets (which include World Heritage Sites, Scheduled Ancient Monuments, Listed Buildings, Protected Wreck Sites, Registered Parks and Gardens, Registered Battlefields or Conservation Areas);
- Protects the settings of such designations;
- In appropriate circumstances, seeks adequate information (from desk based assessment and field evaluation where necessary) to enable informed decisions, and
- Provides for the excavation and investigation of sites not significant enough to merit in-situ preservation.

8.27 On the 25th March 2015 Historic England (formerly English Heritage) withdrew the PPS5 Practice Guide. This document has been replaced with three Good Practice Advice in Planning Notes (GPAs), 'GPA1: Local Plan Making' (Published 25th March 2015), 'GPA2: Managing significance in Decision-Taking in the historic Environment' (Published 27th March 2015) and 'GPA3: The Setting of Heritage Assets (Second Edition Published December 2017). A further document entitled 'GPA4: Enabling Development' is yet to be adopted.

8.28 The GPAs provide supporting guidance relating to good conservation practice. The documents particularly focus on the how good practice can be achieved through the principles included within national policy and guidance. As such, the GPAs provide information on good practice to assist LPAs, planning and other consultants, owners, applicants and other interested parties when implementing policy found within the NPPF and PPG relating to the historic environment.

## Local Policy

---

### Local Plan

8.29 There are three parts to the Norwich Local Plan, adopted November 2014, being the Joint Core Strategy (JCS), the Development Management Policies Plan (DM), and the Site Allocations and Site Specific Policies Plan. The JCS, adopted by Broadland, Norwich and South Norfolk Councils, is the key planning policy document for the Greater Norwich area. The JCS was adopted in March 2011, and amended by the Broadland Part of the Norwich Policy Area: Local Plan, adopted in January 2014

8.30 Selected JCS and DM policies are shown below, focusing upon those pertinent to the historic built environment.

### Local Plan

## **Joint Core Strategy (Broadland District Council, Norwich City Council and South Norfolk Council, (March 2011; amendments adopted January 2014)**

### *Policy 2: Promoting Good Design*

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

In particular development proposals will respect local distinctiveness including as appropriate, [*inter alia*]:

- The historic hierarchy of the city, towns and villages, maintaining important strategic gaps;
- The landscape character and historic environment, taking account of conservation area appraisals and including the wider countryside and the Broads area; and,
- Townscape, including the city and the varied character of our market towns and villages.

This will be achieved by ensuring that:

- Major development areas providing over 500 dwellings or 50,000m<sup>2</sup> of non-residential floorspace, and areas of particular complexity will be masterplanned using an inclusive, recognised process demonstrating how the whole scheme will be provided and ensuring that it is well related to adjacent development and infrastructure.
- All residential development of 10 units or more will be evaluated against the Building for Life criteria published by CABI (or any successor to this standard) achieving at least 14 points (silver standard); and
- Design and Access Statements for non-residential development will meet similar high standards.

### *Policy 11: Norwich City Centre*

The regional centre role will be enhanced through an integrated approach to economic, social, physical and cultural regeneration to enable greater use of the city centre, including redevelopment of brownfield sites. It will be the main focus in the sub-region for retail, leisure and office development. Housing and educational development will also reinforce the vibrancy of the city centre. Its role will be promoted by [*inter alia*]:

- Enhancing the historic city, including its built, archaeological and environmental assets and its distinctive character as identified in Conservation Area appraisals, through innovative, sustainable design.

---

## Local Plan

### Development Management Policies Plan

#### *Policy DM9 – Safeguarding Norwich’s heritage*

All development must have regard to the historic environment and take account of the contribution heritage assets make to the character of an area and its sense of place (defined by reference to the national and local evidence base relating to heritage, including relevant detailed advice in conservation area appraisals).

Development shall maximise opportunities to preserve, enhance, or better reveal the significance of designated heritage assets and that of any other heritage assets subsequently identified through the development process. It will also promote recognition of the importance of the historic environment through heritage interpretation measures.

Where proposals which involve the unavoidable loss of any designated or locally identified heritage asset are accepted exceptionally under this policy, a legally binding commitment from the developer must be made to implement a viable scheme before any works affecting the asset are carried out.

#### Locally identified heritage assets

Where locally identified heritage assets are affected by development proposals, their significance should be retained within development wherever reasonably practicable. Development resulting in harm to or loss of significance of a locally identified asset will only be acceptable where:

- a) there are demonstrable and overriding benefits associated with the development; and
- b) it can be demonstrated that there would be no reasonably practicable or viable means of retaining the asset within a development.

---

#### Other Heritage Assets

Consideration will be given to the protection of heritage assets which have not been previously identified or designated but which are subsequently identified through the process of decision making, or during development. Any such heritage assets, including artefacts, building elements or historical associations which would increase the significance of sites and/or adjoining or containing buildings, will be assessed for their potential local heritage significance before development proceeds. Where heritage assets newly identified through this process are demonstrated by evidence

and independent assessment to have more than local (i.e. national or international) significance, there will be a presumption in favour of their retention, protection and enhancement. Where heritage assets newly identified through this process are demonstrated to have local significance, development proposals affecting them will be determined in accordance with the criteria for existing locally identified heritage assets as set out in this policy. Any assessment of local significance should be made in accordance with the criteria set out in Appendix 7 of this plan. [Note: the Appendix 7 referred to is that in the Local Plan, not in this Environmental Statement]

#### Historic Environment Record

Development proposals affecting designated and locally identified heritage assets will be expected to show that the significance of these assets has been adequately assessed and taken into account by reference to the Historic Environment Record and the relevant local evidence base. Where a heritage asset is lost or its significance harmed the asset must be recorded and placed on the Historic Environment Record.

## METHODOLOGY AND ASSESSMENT CRITERIA

### Identifying the Study Area

---

- 8.31 A Study Area was drawn to include both the Site in its entirety and also the surrounding wider context. The extent of the study area is proportionate to the scale and nature of the proposal. It has also been determined to be proportionate, recognising the high density of archaeological assets within Norwich. Its extents were established through discussion with the archaeological advisors to Norwich City Council to ensure its acceptability.
- 8.32 The Study Area was drawn to include all designated and undesignated archaeological assets within a 250m radius of the Site boundary.

### Methodology for establishing baseline conditions

---

- 8.33 The baseline assessment, included within the Archaeological Impact Assessment as **Appendix 8.1**, comprises an examination of evidence on the Norfolk Historic Environment Record (NHER) and other sources, including Norwich Archive, in line with national, regional and local policy and guidance. The report also includes the results of a comprehensive map regression exercise and a site visit conducted in April 2016 as well as an assessment of the likely impact caused by the current Anglia Square development based on architectural plans and sections held in Norwich Record Office.

### Desk Survey

---

- 8.34 Baseline data has been gathered from the Norwich Historic Environment Record (HER), the Norwich Archive, the National Heritage List for England for information on Scheduled Monuments, Registered Historic Parks and Registered Battlefields and online sources (A Vision of Britain, Archaeological Data Service, Access to Archives, Britain From Above, British Geological Survey, Google Earth, Heritage Gateway and Old Maps) in order to identify and characterise archaeological assets that may be affected by the proposed Development and the potential archaeological interest of the Site:
- 8.35 Baseline data from the above sources is presented in the Archaeological Impact Assessment report (**Appendix 8.1**). This was undertaken in accordance with the Chartered Institute for Archaeologists' 2014 Standard and Guidance for Historic Environment Desk-Based Assessment. **Appendix 8.1** includes mapping which shows the location of all of the identified designated archaeological assets within 250m of the Site.

## Consultation

---

- 8.36 The proposed Development has been the subject of detailed consultation with the archaeological advisor to Norwich City Council and Norfolk County Council, commencing in 2016 and continuing through to the present. A site walkover was undertaken on 25<sup>th</sup> August 2016 with Ken Hamilton, then archaeological advisor to Norwich City Council. On the basis of this and the nature of the proposed development, Mr Hamilton agreed in principle that no further archaeological evaluation would be required for the scheme, that it could be scoped out of the Environmental Impact Assessment, and that any required archaeological works could be achieved through conditions placed upon planning consent.
- 8.37 Subsequent to this Mr Hamilton left his post, and consultation continued with Dr James Albone. As a result of alterations to the proposed scope of the development, Dr Albone subsequently requested that archaeology be scoped in to the Environmental Impact Assessment (email 29<sup>th</sup> January 2018) on the grounds that central and eastern areas of the site had not previously been archaeologically investigated and that there was a potential for the scheme to significantly impact on buried archaeological remains.

## Methodology for Assessing Potential Effects, Identifying Mitigation Measures and Assessing Residual Effects

---

- 8.38 In accordance with the NPPF and local planning policy, an Archaeological Impact Assessment has been prepared to support the planning application and inform the preparation of this chapter. The Archaeological Impact Assessment forms **Appendix 8.1**. This ES Chapter draws on the information in the Archaeological Impact Assessment to describe the baseline conditions in terms of the archaeological significance of the identified assets and the potential impact of the Development on their significance.
- 8.39 Potential 'receptors' comprise identified archaeological assets, including both designated (World Heritage Sites, Scheduled Monuments, Protected Wreck Sites and Registered Battlefields) and also non-designated sites. Further details on these can be found in the 'Existing Baseline Conditions' section below.
- 8.40 The approach outlined below has been followed to assess likely significant effects, identify outline mitigation measures, and assess likely residual effects:
1. Consideration of best practice / guidance;
  2. Use of professional judgement;

3. Consideration of the baseline information obtained, scheme details and issues raised through consultation with interested parties as a result of responses to the EIA Scoping Report and through post-scoping consultation (where appropriate);
4. Prediction of potential effects based on baseline information and scheme details;
5. Identification of effects which, in particular, could be considered to be potentially significant in terms of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011 (SI No 1824) (hereinafter referred to as “the EIA Regulations”);
6. Identification of appropriate mitigation measures; and
7. Prediction of residual effects based on baseline information, details of the proposed Development and mitigation measures.

### **Methodology for Assessing Effects on Setting of Heritage Assets**

---

8.41 The assessment of setting effects has been undertaken in line with the five step assessment process presented in Historic England’s 2017 Guidance: The Setting of Heritage Assets (Historic Environment Good Practice Advice in Planning 3):

1. Identify which archaeological assets and their settings are affected.
2. Assess the degree to which these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated.
3. Assess the effects of the proposed development, whether beneficial or harmful, on that significance or on the ability to appreciate it.
4. Explore ways to maximise enhancement and avoid or minimise harm.
5. Make and document the decision and monitor outcomes.

8.42 In the current context, Steps 1-3 are the most relevant, Step 4 having been addressed as far as practicable through embedded mitigation and Step 5 being outside the scope of the EIA process.

### **Significance criteria**

---

8.43 The following section outlines the criteria that have been used to establish the sensitivity of receptors, magnitude of impact and significance of effect.

## Sensitivity

8.44 The sensitivity of heritage assets to impacts depends on factors such as the condition of the Site and the perceived heritage value and importance of the Site. The value of the receptor (the heritage asset) is defined by its importance in terms of national, regional or local statutory or non-statutory protection and grading of the asset. Where undesignated assets are affected reference is made to relevant designation criteria (Historic England's Principles of Selection for Listed Buildings and Scheduled Monuments, supported by the relevant Selection Guides). These documents provide criteria for determining the importance of specific classes of asset. **Table 8.1** presents the scale of values that have been assigned to heritage assets; this is based on guidance provided in the Design Manual for Roads and Bridges, Volume 11.3. (HA 208/07)

**Table 8.1: Sensitivity / importance of Heritage Assets**

Sensitivity	Importance	Definition / Example of Archaeological Receptor
<b>Very High</b>	International	World Heritage Sites (including nominated sites) Assets of acknowledged international importance Assets that contribute significantly to acknowledge international research objectives
<b>High</b>	National	Scheduled Monuments and Area of Archaeological Importance Archaeological sites of schedulable quality and importance Registered Battlefields Protected Wreck Sites Registered Parks and Gardens (all grades) Non-designated assets, including landscapes, of demonstrable national importance
<b>Medium</b>	Regional	Undesignated assets, including landscapes, of demonstrable regional importance
<b>Low</b>	Local	Assets with significance to local interest groups

## Magnitude of Impact

8.45 'Impacts' result from change in the significance (as defined in the NPPF) of the asset attributable to the Development, and the magnitude of impact reflects the degree of change in the asset's significance.

8.46 Change can arise as a result of construction on below-ground archaeological assets; change can also affect the setting of an archaeological asset caused by the proximity of new structures, by noise or dust, or other elements.

8.47 Such change can be adverse or beneficial, temporary or permanent, reversible or irreversible. **Table 8.2** presents the magnitude of impact criteria related to heritage assets.

**Table 8.2: Criteria for Determining the Magnitude of Impact**

<b>Magnitude of Impact</b>	<b>Example of Adverse Change</b>	<b>Example of Beneficial Change</b>
<b>Major</b>	<p><b>Total or substantial loss of the significance of an archaeological asset.</b></p> <p>Substantial harm to an archaeological asset's setting, such that the significance of the asset would be totally lost or substantially reduced (e.g. the significance of a designated archaeological asset would be reduced to such a degree that its designation would be questionable or the significance of an undesignated archaeological asset would be reduced to such a degree that its categorisation as an archaeological asset would be questionable).</p>	<p><b>Prevention of further degradation</b> of the asset consistent with safeguarding its heritage significance</p> <p><b>Increase accessibility and understanding</b> of visible assets by removal of visibly intrusive elements</p>
<b>Moderate</b>	<p><b>Partial loss or alteration of the significance of an archaeological asset.</b></p> <p>Considerable harm to an archaeological asset's setting, such that the asset's significance would be materially affected/considerably devalued, but not totally or substantially lost.</p> <p>This equates to less than substantial harm in the terms of the NPPF.</p>	<p><b>Reduce rate of current degradation</b></p> <p>Improve setting</p> <p>Enhance existing character</p>
<b>Minor</b>	<p><b>Slight loss of the significance of an archaeological asset.</b></p> <p>This could include the removal of fabric that forms part of the archaeological asset, but that is not integral to its significance (e.g. the demolition of later extensions/additions of little intrinsic value).</p> <p>Some harm to the archaeological asset's setting, but not to the degree that it would materially compromise the significance of the archaeological asset.</p> <p>Perceivable level of harm, but insubstantial relative to the overall interest of the archaeological asset.</p> <p>This equates to less than substantial harm in the terms of the NPPF, at the lower end of the scale.</p>	<p><b>Reintroduce accessibility to below-ground archaeological asset</b></p>
<b>Negligible</b>	<p><b>A very slight change to the significance of an archaeological asset.</b></p> <p>This could include a change to a part of an archaeological asset that does not materially contribute to its significance.</p> <p>Very minor change to an archaeological asset's setting such that does not affect its significance.</p>	<p><b>Reintroduce accessibility to below-ground archaeological asset</b></p>

**Significance of effects**

8.48 Significance of effect has been determined with reference to the sensitivity of the asset affected and the magnitude of the impact. **Table 8.3** provides a matrix to act as a guide to determining significance.

8.49 The matrix is not intended to mechanise judgement of the significance of effect, but to act as a check to ensure that judgements regarding sensitivity, magnitude of impact and significance of effect are reasonable and balanced in order to allow for professional judgement. In some cases the matrix

allows a choice of significance of effect when a magnitude of impact and a value are combined. In these cases the individual attributes of a specific asset, along with any relevant site specific factors and consideration of other influencing elements, have been taken into account when considering which is the most appropriate significance of effect to apply.

8.50 Based on professional judgement, a “significant” effect in terms of the EIA Regulations is considered to be one of moderate significance or above. Such effects require mitigation if they are adverse. All effects that are considered to be significant with regard to the EIA Regulations are highlighted in bold in **Table 8.3**.

**Table 8.3: Guidelines for Determining Significance of Effect**

Sensitivity	Magnitude			
	Negligible	Minor	Moderate	Major
Very High	Slight/ Negligible	<b>Moderate/Major</b>	<b>Major</b>	<b>Major</b>
High	Negligible	<b>Moderate/slight</b>	<b>Moderate/ Major</b>	<b>Major</b>
Medium	Negligible	Slight	<b>Moderate</b>	<b>Moderate/Major</b>
Low	Negligible	Negligible	Slight	<b>Moderate/ Slight</b>

## EXISTING BASELINE CONDITIONS

### Introduction

---

- 8.51 Archaeological assets within the Site and surrounding area, and the Site's potential for the presence of additional, as-yet undiscovered, archaeological assets have been established through desk-based review of existing data sources, site inspection visits, and previous programmes of archaeological trial trenching within the Site itself.
- 8.52 The following sections present a summary of the baseline information gathered from these sources with particular reference to receptors which are likely to be directly impacted by the Development. Designated archaeological assets are referred to by their Heritage List number prefixed 'List', undesigantated assets recorded on the county Historic Environment Record are referred to by their Norfolk HER number.

### Designated Heritage Assets

---

- 8.53 There are no designated archaeological assets (World Heritage Sites, Scheduled Monuments, Protected Wreck Sites or Registered Battlefields) either within the Site or within the wider 250m study area. These categories of archaeological assets have therefore been scoped out of further consideration in this assessment.

### Baseline Conditions

---

- 8.54 A detailed assessment of the baseline conditions is provided within **Appendix 8.1**, including the historical development of the Site and its surroundings.
- 8.55 The Site falls within an area identified as The Area of Main Archaeological Interest by Norwich City Council in the Local Plan Development Management Policies document, in Policy DM9, and appears on the Council's Policies mapping. It covers the extent of the walled Medieval city and a few outlying suburbs, including the Site, and provides the basis for judging any development proposal according to the significance of remains likely to be found within the Site. Whilst this Area is not one of the five designated Areas of Archaeological Importance under the 1979 Ancient Monuments and Archaeological Areas Act, it nonetheless has the potential to contain significant archaeological remains of regional importance, and has been assessed accordingly.
- 8.56 The Site has been subject to previous archaeological investigation in the 1970s, in 2007 and in 2010. These investigations have established that there are substantial surviving buried archaeological deposits and features in some areas within the Site, principally relating to the Anglo Saxon, Early and Late Medieval and Post Medieval periods. These investigations were largely confined to the

western half of the site, and demonstrated that in this area the archaeological remains were sealed by up to 1m of modern made ground, and were themselves up to a metre deep in places. Some deposits and cut features, including the Late Anglo Saxon defensive ditch were deeper still, and not excavated to their full depth.

- 8.57 However, the construction of the Anglia Square complex on the Site in the 1960's is likely to have truncated significant areas of this archaeological potential. Documents relating to this development are held in the Norfolk Record Office, and include detailed construction plans and sections for the present multi-storey car park and retail complex. Further evidence for the construction of the Anglia Square development takes the form of film and photographic archives.
- 8.58 These documents are not reproduced here because they are subject to copyright, and cannot be reproduced in any form until 70 years after the death of the architect. However, they are freely accessible at the Norfolk Record Office. A full list of the documents accessed and a brief description of their content can be found in Appendix 4 of the accompanying Archaeological Impact Assessment (**Appendix 8.1**).
- 8.59 The documents show that the car park is likely to have caused significant truncation, with lift shaft pits excavated to a depth of 12 feet (3.66m) below ground level and dug with sides battered at a 45 degree angle. The foundation trenches themselves were dug to a depth of up to 8 feet (2.44m) below ground level, whilst some of the foundation slabs were planned to extend more than 10 feet (3.05m) below ground level. The foundations for the elevated roads surrounding the car park are likely to have been similarly intrusive, being built on foundations 7 feet (2.13m) deep.
- 8.60 Plans and sections for the cinema complex indicate that the foundations are likely to extend to a depth of 5 to 7 feet (1.524m to 2.13m) in places, whilst an accompanying sewer was laid at a depth of over 8 feet (2.44m). The foundation section for the HMSO office block (Sovereign House), suggests a substantial depth of foundations. Although the full extents of these are not shown, the section shows two pipes at depths of 6ft (1.83m) and 5 feet 7 (1.70m) feet below ground level respectively. These were sealed by a 6 inch (0.15m) concrete slab, itself sealed by dumps of assorted material in 6 inch (0.15m) bands. Piles and pile caps are also shown, the latter at depths of 3 feet (0.91m).
- 8.61 The depth of the piles for the HMSO office block is not given, although notation on a separate drawing indicates that weight bearing piles should be a minimum of 11 feet 6 inches (3.51m) deep, whilst the piles for the Odeon Cinema varied between 8 feet (2.44m) and over 12 feet (3.66m) in depth.
- 8.62 In the light of this, extensive disturbance of archaeological deposits is expected as a result of the construction of the existing Anglia Square development. Contemporary ground level at the time of construction is recorded variously as 12 feet (3.65m) at the Cinema aOD 13 feet (3.94m) aOD at the

Car Park and between 11 ft 2 inches (3.40m) and 13ft (3.94m) aOD on the HMSO site. These figures indicate that the current ground level (ranging between c. 4.40m aOD and 5.50m aOD) has been raised since the construction plans have been drawn up. As a result, truncation is likely to be deeper relative to the modern ground surface than might otherwise be expected.

- 8.63 The Norfolk HER contains no record of prehistoric finds or features within the Site, and none were found during the course of previous archaeological investigations on the Site. Findspots within the Study Area include an *in situ* Upper Palaeolithic or Early Mesolithic scatter of worked flints 110m to the south east of the Site (MNF61890), whilst residual Mesolithic and Neolithic struck flints have been recovered from other archaeological investigations within the Study Area. On the basis of this evidence, the likely potential for the Site to contain buried remains of prehistoric date is considered low.
- 8.64 The main concentration of Roman activity in the vicinity of Norwich comprises the Roman town of Venta Icenorum, some 5km to the south of the Site. However, a worn Roman coin has been recovered from within the Site (MNF22) and Roman pottery has been found during nearby archaeological excavations within the study area, whilst a bronze Roman oil lamp was also found at St Augustine's gate in the late 18<sup>th</sup> century (MNF 648). These isolated finds suggest that there was Roman activity in the area, although the quantity of finds recovered is low. In the light of this, and the absence of any Roman finds or features identified in the previous archaeological works on the site, the archaeological potential for Roman remains to be encountered within the Site is considered low.
- 8.65 Norwich has its origins in the Anglo-Saxon period, when it developed as a major trading centre, known as *Norwic*. It lay astride the river Wensum, and the Late Anglo Saxon defensive circuit has been identified within the Site itself. These follow the eastern edge of Botolph Street before curving to the north east at the northern end of Botolph Street and then east towards Edward Street. The eastern half of the Site lies within this defensive circuit and therefore within the late Anglo Saxon town.
- 8.66 Evidence for the Anglo Saxon town and associated activity is abundant in close proximity to the Site and includes evidence for industries such as metalworking, including both smelting and smithing, and also horn working, whilst timber built structures and numerous rubbish pits have also been found in excavation. Excavations on Oak Street, to the south west of the Site, have identified the foundations of a substantial building, possibly a church (MNF43646).
- 8.67 A number of churches pre-dating the Norman Conquest are known within Norwich. Two of these appear to have lain within the Site. The first of these is St Botolph's Church (MNF587), located on the original junction of Botolph Street and Magdalen Street. Skeletal remains recovered in this area during work in the 1960s in this area are likely to be related. St Olave's Church, established in the Late Saxon period, and recorded as being demolished in 1546 also lay within the Site (MNF452).

This is depicted on historic maps, and has been mapped in the vicinity of the Pitt Street roundabout, although reused material from the church has been recorded in a Post Medieval building within the Site, and numerous *in situ* and disarticulated remains have been found in trenching in the area, indicating the likely location of the churchyard. The recorded location of All Saint's Church, recorded in the Domesday and taken down in 1550, is only 40m to the east of the Site boundary (MNF589), whilst St Paul's Church, also now demolished lay 150m to the east.

- 8.68 In the light of this evidence, the likelihood of there being Anglo Saxon remains present within the Site is high. These are likely to include remains associated with two churches, including both structural remains and associated burials. Within the line of the Late Saxon defences there is also likely to be surviving evidence for Anglo Saxon occupation in the form of both domestic and industrial activity, whilst the defences themselves are also likely to be present.
- 8.69 The Anglo Saxon defensive ditch was gradually infilled in the Medieval period, being replaced by a new defensive ditch in AD 1253, which was supplemented by a new city wall between 1294 and 1343. These new defences encompassed a larger area, and lay some distance to the west and north of the Site, and the Site itself lay well within the expanded Late Medieval city, and incorporated both the churches of St Olave's and St Botolphs and their associated burial grounds.
- 8.70 Both documentary and archaeological evidence points to Medieval occupation within the Site. Archaeological excavation has identified evidence for occupation and industry along the frontage to Botolph Street, although this had seen some truncation by later cellars. Despite this a number of structures were found, along with yards, hearths and evidence for iron working, numerous pits and two wells. Both St Olave's and St Botolph's churches remained in use into the early Post Medieval period, whilst there was a Medieval cross, Stump Cross, located on the boundary of the southeast corner of the Site near Magdalen Street (MNF26429).
- 8.71 Evidence from the surrounding area also highlights the potential Medieval occupation, with evidence for domestic settlement, rubbish pits, iron working, horn working and tanning, whilst there is evidence for the establishment of several hospitals and almshouses.
- 8.72 In the light of all of this evidence, the potential for further unknown Medieval remains to be encountered within the Site is considered high.
- 8.73 Archaeological interventions within and surrounding the Site have identified further evidence for domestic and industrial activity. Along Botolph Street, surviving evidence for fifteenth and sixteenth century structures was identified, whilst a large sixteenth century hall-house was also identified fronting on to the east side of the former line of George Street (MNF284). Numerous extraction pits and rubbish pits have also been identified.

- 8.74 Early maps of the area, including the 1696 Clear Map of Norwich show the density of Post Medieval occupation, with buildings fronting onto streets with wards behind. Some areas of open ground are shown to the north, south and east of the site, but these were later developed, as is seen on later maps of the 18<sup>th</sup> and 19<sup>th</sup> century. Despite the truncation caused by later cellars, the presence of Post Medieval remains within evaluation trenches on the Site indicates that there is a high potential for Post Medieval remains on the Site.
- 8.75 Modern development on Site has seen a dramatic change to the Site's form. The original road layout of the Late Medieval period was retained through the Post Medieval until the 1960s, when considerable redevelopment of the area and the establishment of Anglia Square took place. Maps of the late 19<sup>th</sup> and 20<sup>th</sup> century show much development on the Site, with the construction of new buildings, including a cinema and a factory. There was major redevelopment and landscaping of the Site in the 1960s onwards with the road layout altered significantly and widespread clearance of the Site in advance of the construction of the new Anglia Square, with a multi storey car park to the north and also Sovereign House to the south, whilst elsewhere more open areas were used to provide further car parking space. More recently, some of the buildings in the west of the Site have been demolished and the land used as car parking.
- 8.76 Past developments will have had a variable impact on the below ground archaeology. Modern construction of the present multi-storey car park and retail / office complex will have had a severe and widespread negative impact through the cutting of foundations and services, and the excavation of any basements or cellars. The impact of the surface car parking to the north and west of the site is considered to be low. The destructive impact of nineteenth century cellared buildings upon below ground archaeology has already been demonstrated through previous excavation. The construction of these buildings occupying existing and former street frontages is considered likely to have had a severe and localised impact on below ground archaeological deposits. Pre-nineteenth century developments are considered to have a moderate and localised impact on below ground archaeology.
- 8.77 On the basis of this baseline assessment, it is considered that the Site has a low potential for the presence of hitherto unrecorded archaeological remains of the prehistoric and Roman periods, but that the potential for Anglo Saxon, Early and Late Medieval and Post Medieval remains on the Site is high. These remains are likely to be regionally significant, and their sensitivity to impact is therefore considered to be **medium**.

### **Predicted impacts**

---

- 8.78 The proposals for the Site comprise a mixed use development, involving the demolition of existing buildings and new development on the positions of these and on currently undeveloped land within the Site boundary.

- 8.79 The new Development will include the construction of an enhanced retail/leisure/commercial/hotel development, two public squares and streets, a new cinema, a new multi storey car park, and the relocation of Surrey Chapel to a new site on Edward Street. The Development includes proposals for several large structures, including a 25 storey tower. The proposed layout would also reinstate the line of St George's Street, reflecting the historic streetscape that was lost when the area suffered post-war clearance.
- 8.80 Development may adversely affect archaeological assets during the construction phase, when significance may be lost as a result of physical removal of an archaeological asset or as a result of change in the setting of the asset, and during its operational or post-construction phase, when significance may be lost as a result of change in setting.
- 8.81 The scale of the Development has the potential to impact negatively on any undesignated archaeological assets within the Site. The construction of the complex will include extensive demolition and construction activities which are likely to involve significant earthworks, foundations and piling, all of which have the potential to impact negatively on buried archaeological features and deposits within the Site.
- 8.82 This assessment has already established that there are no designated archaeological remains within the Site or Study Area, and consequently these have been scoped out of further consideration. It has, however demonstrated that there are likely to be Anglo Saxon, Medieval and Post Medieval remains on the Site likely to be of regional importance which have a **medium** sensitivity to impacts.

# ASSESSMENT OF POTENTIAL EFFECTS

## Construction Effects

- 8.83 Where construction activities physically impact upon buried archaeological remains, leading to their destruction, the impact is both permanent, and irreversible. There are no designated archaeological assets within the Site. However, both the Archaeological Impact Assessment undertaken in support of the proposed Development and previous archaeological fieldwork on the Site have identified that there is a high potential for previously unrecorded archaeological remains of Anglo Saxon, Early and Late Medieval and Post Medieval date to be present within the Site, considered to be of **medium** significance. The absence of basements as part of the proposed Development (with the exception of the proposed cinema), along with the use of dispersed pile clusters in some areas, combined with the depth of the archaeological deposits encountered to date on Site will allow some archaeological remains to be preserved in situ. Elsewhere, localised impacts such as high density pile clusters, the lowest part of the raked cinema floor, deep lift shaft pits or impacts on burial grounds have the potential to result in the complete loss of significance and an impact of **Major** magnitude. In the light of this, and using the methodology outlined above and utilising professional judgement, it is considered that this impact would have a **Moderate** significance of effect, without mitigation. This would comprise a **Significant** impact in terms of the EIA regulations
- 8.84 The baseline information presented above constitutes Step 1 of the five step setting assessment process recommended by Historic England. It has established that there are no designated archaeological assets sufficiently close to, or associated directly with the Site such that there is a potential for their setting (and therefore any contribution this setting makes to the asset's significance) to be impacted upon by the proposed Development. It is therefore concluded that the construction phase will not affect the setting of any archaeological assets.

## Operational Effects

- 8.85 Potential operational or post-construction phase potential effects are restricted to those resulting from changes to the setting of archaeological assets. Because no archaeological assets were identified which might be impacted in this way, there is no potential for the proposed development to affect the setting of designated assets during the operational phase.

## Mitigation Measures

---

- 8.86 Significant adverse effects would result from the unmitigated loss of the archaeological assets identified or potentially present within the Site during the construction phase. Specific mitigation measures are proposed for this effect only.

- 8.87 The depth of the archaeological remains and design of the proposed Development will allow the preservation of archaeological remains in situ in some areas. In other areas, however, there will be specific negative impacts on buried archaeological remains. In these areas, the physical loss of archaeological assets during the construction phase will be offset by a phased programme of archaeological works. This may comprise further evaluation work to verify and augment the results of the previous work on the Site and to inform the scope of subsequent archaeological mitigation, which is likely to comprise archaeological excavation, recording and analysis leading to publication.
- 8.88 This scope and extent of these works will be agreed in advance with the archaeological advisors to Norwich City Council, and monitored by them throughout the phases of fieldwork and reporting. It is considered that such work could be undertaken post-consent, secured by planning condition.
- 8.89 No mitigation measures will be required for the operational phase of works.

#### Residual Effects

---

- 8.90 Mitigation is proposed in relation to the loss of archaeological assets within the Site. Their physical loss would either be completely prevented through their preservation in situ or offset through their preservation by record; as there would be no perceptible loss to the historic environment and the recording and analysis would fully realise their potential as sources of archaeological data, it is considered that the latter would fully offset the physical loss of such remains. Following this programme of archaeological work there would therefore be a **slight** residual effect. This is **not significant** in the terms of the EIA Regulations.
- 8.91 No operational/post-construction impacts have been identified.

#### Cumulative Effects

---

- 8.92 Type 2 cumulative effects are the combined effects of several development schemes (in conjunction with the proposed Development) which may, on an individual basis be insignificant but, cumulatively, have a significant effect.
- 8.93 The ES Chapter has given consideration to ‘cumulative effects’ for a number of schemes, as agreed with NCC during the scoping process (email dated 12 January 2018).

**Table 8.4: Schemes Scoped in for Assessment of Cumulative Effects**

Project Name	Project Reference and Description	Status

<p>St Annes Wharf King Street Norwich Norfolk</p>	<p>04/00605/F: The demolition of existing buildings to slab level and the development of the following mixes; 437 residential units ,2128 sq m of A1,A2 , A3 and D2 uses(max.2000 sq m A1),the provision of 305 car parking spaces, riverside walkway, public open space and hard and soft landscaping including external lighting ,seating, bollards, walkways, cycle paths, steps and ramps, internal access roads, delivery bays, boundary enclosure, new vehicle and pedestrian and cycle access points, alteration of existing access points and associated infrastructure works</p>	<p>Consented 16 March 2006</p> <p>Under construction</p>
<p>Land North Of Carrow Quay Kerrison Road Norwich</p>	<p>11/02104/O: Outline application with full details of access for residential-led development of between 200 and 250 No. residential flats (Use Class C3) and 140 car parking spaces with commercial office space (Class B1a), groundsman's facilities (Class B8), community uses (Class D1/D2) and associated works including Riverside Walk and access road</p>	<p>Consented 28 Jun 2013</p> <p>A lawful start has been made on site.</p>
<p>Barrack Street Development Site Barrack Street Norwich</p>	<p>15/01927/O: Outline application with all matters reserved for the erection of up to 200 dwellings, together with public open space and up to 127 car parking spaces for B1 office use and 150 residential parking spaces.</p>	<p>Consented 12 August 2016</p>
<p>The Quad, All Saints Green, Norwich</p>	<p>16/00790/F: Construction of a 244 student bedroom development with management facilities and amenities; flexible office/business space with independent access, and associated landscaped courtyard (revised)</p>	<p>Consented 28 October 2016</p>
<p>St Marys Works Duke Street Norwich NR3 1QA</p>	<p>16/01950/O: Outline planning application to include the demolition of office/workshop buildings; part demolition/part retention, conversion and extension of St Mary's Works building and redevelopment of the site to provide circa 151 residential units (Use Class C3); circa 4,365sqm office floor space (Use Class B1a); circa 3,164sqm hotel and ancillary restaurant facility (Use Class C1); circa 451sqm retail (Use Class A1/A5); circa 57sqm gallery space (A1/D1); circa 124 parking spaces</p>	<p>Resolution to grant consent, awaiting s.106 Agreement for issue of decision</p>

	and associated landscaping works (amended description and plans)	
Land And Buildings North East Side Of Spitfire Road Norwich	17/00016/F: Construction of hotel with associated parking, landscaping and highways works	Consented 6 December 2017
St Stephens Tower St Stephens Street Norwich, NR1 3QN	17/00357/F: Redevelopment of St Stephens Tower for student accommodation with vertical extensions, demolition of ancillary structures to facilitate a new link building and landscaping.	Consented 8 September 2017
Car Park Rear Of Premier Travel Inn Duke Street Norwich, NR3 3AP	17/01078/F: Redevelopment of car park site to provide student accommodation	Awaiting decision
St Crispins House Duke Street Norwich NR3 1PD	17/01391/F Change of Use application in respect of the conversion and extension of an existing 3, 4 and 5 storey office building (B1 use class) to student accommodation (sui generis use class) containing 614 student bed spaces and communal accommodation at ground floor level, to include common room facilities and a gymnasium. Associated external works.	Awaiting decision

8.94 This assessment has identified that no archaeological assets (either designated or undesignated), which lie beyond the confines of the Site itself, will be impacted by the proposed Development, and in the light of this, no cumulative effects on archaeological assets have been identified.

## SUMMARY

- 8.95 This assessment has identified that there will be no impacts on designated or undesignated assets or their settings outside the Site itself. Within the Site there is a high potential for previously unrecorded archaeological remains of Anglo Saxon, Early and Late Medieval and Post Medieval date, considered to be of **Medium** significance. Survival of these archaeological remains is likely to be variable, with the construction of the current Anglia Square likely to have caused significant truncation of archaeological features and deposits in some areas.
- 8.96 It is anticipated that the design of the proposed Development should afford the opportunity for some archaeological remains to be preserved in situ. However, there will be localised impacts such as the lower part of the raked floor of the cinema, lift shafts and high density pile clusters, which have the potential to result in the complete loss of significance and an impact of **Major** magnitude during the construction phase. In the light of this it is considered that this impact would have a **Moderate** significance of effect, without mitigation. This would comprise a **Significant impact** in terms of the EIA regulations.
- 8.97 No impacts are predicted on archaeological assets or their setting in the post-construction or operational phase of the proposed Development.
- 8.98 Mitigation is proposed in relation to the loss of archaeological assets within the Site. Their physical loss would either be completely prevented through their preservation in situ or offset through their preservation by record; as there would be no perceptible loss to the historic environment and the recording and analysis would fully realise their potential as sources of archaeological data, it is considered that the latter would fully offset the physical loss of such remains. Following this programme of archaeological work there would therefore be a **slight** residual effect. This **is not significant** in the terms of the EIA Regulations.
- 8.99 Because identified impacts on archaeological assets will be confined to the limits of the Site itself, no cumulative effects have been identified.