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Central Bedfordshire Council
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Our ref: PL00469602

24 August 2018

[REDACTED]
Scoping Opinion: Prologis Park Marston Gate Phase II, Ridgmont, Bedford, MK43 0XP

**Development of up to 166000sqm of B8 class use
Application No. CB/18/02804/SCO**

Thank you for your letter of 03 August 2018 consulting Historic England about the above EIA Scoping Report. This relates to the development of Prologis Park Marston Gate II, a development of up to 166,000 square metres of B8 accommodation with associated uses. The site area is approximately 44.5 hectares of which roughly 30 hectares would comprise built development. It is located to the east of the established Prologis Park Marston Gate which comprises nine warehouses. The land is currently used as arable farm land. A further proposal for a warehouse scheme to the west of the existing development is being designed.

The development of this site could, potentially, have an impact upon a number of designated and non-designated heritage assets and their settings in the area around the site. Historic England are concerned that the proposed study area is too limited given the scale of development proposed. This does not appear to be specifically defined but seems to be c.1 kilometre given the small number of designated heritage assets specifically mentioned in the Archaeology and Built Heritage section. Our initial desk-top study indicates there are 45 designated heritage assets within 2 kilometres of the proposed development boundary. A number of these assets lie just beyond the 1 kilometre boundary. These include several scheduled monuments, grade II* listed churches and other buildings and conservation areas. The historic estate of Woburn Abbey lies to the west and part of the grade I registered historic landscape lies within the 2 kilometre zone. We would therefore draw your attention, in particular, to the following:

Woburn Abbey
Malting Spinney Medieval Moat and earthworks
Ridgmont Ringwork



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All Saints Old Church, Segenhoe
Church of All Saints, Ridgmont
Segenhoe Manor
St James Church
Crawley House

And the conservation areas at Husborne Crawley and Ridgmont

There are also a number of Grade II listed buildings, the settings and context of which will need to be fully considered. We would also expect the Environmental Statement to consider the potential impacts which the proposals might have upon any heritage assets which are not designated. These should also be included as they are valued components of the historic environment. This information is available via the local authority Historic Environment Record (www.heritagegateway.org.uk <<http://www.heritagegateway.org.uk>>) and relevant local authority staff.

In line with the requirements of the National Planning Policy Framework and Planning Practice Guidance we would expect the Environmental Statement to contain a thorough assessment of the potential impact of the development on the significance of any heritage assets affected, including any impact caused by development in their setting. This is defined in the Framework as *'the surroundings in which a heritage asset is experienced.'*

The "Historic Environment Good Practice Advice in Planning Note 3 the Setting of Heritage Assets", provides general advice on understanding setting and how it may contribute to the significance of heritage assets. It also recommends a staged approach to assessing the proposals affecting the setting of heritage assets. Views and visual considerations will be an important component of setting. However, a consideration of other environmental factors such as noise, traffic and light should also be included. The assessment should be carried out in accordance with established policy and guidance, including the National Planning Policy Framework. The Planning Practice Guidance contains guidance on setting (Paragraph: 013 Reference ID: 18a-013-20140306), which is amplified by the Historic England document. Together, these provide a thorough discussion of setting and set out our guidance on the methods for considering the impact of development on setting. We note the proposed methodology for assessment would be guided by this.

Whilst standardised EIA matrices derived from Design Manual for Roads and Bridges (DMRB) Vol 11, ICOMOS's guidance, or similar, are useful tools, we consider the analysis of setting (and the impact upon it) as a matter of qualitative and expert judgement which cannot be achieved solely by use of systematic matrices or scoring systems. Historic England therefore recommends that, if used, these matrices should be seen primarily as material supporting a clearly expressed and non-technical narrative argument within the cultural heritage chapter. The EIA should use the ideas



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of benefit, harm and loss (as set out in the NPPF) to set out 'what matters and why' in terms of the heritage assets' significance and setting, together with the effects (including both positive and negative effects) of the development upon them.

It is important that the assessment is designed to ensure that all impacts are fully understood. Section drawings and techniques such as photomontages are a useful part of this. We note there are viewpoints proposed in relation to the landscape and visual impact assessment but these should also be used to enable an assessment of the impacts on the historic environment. We would welcome the opportunity to advise on these viewpoints in due course.

We trust that this letter is helpful, but should you have any queries, please do not hesitate to contact me.

Yours sincerely,

[REDACTED]
Clare Campbell
Principal Inspector of Historic Buildings and Areas



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