



Historic England

[REDACTED]
Central Bedfordshire Council
Priory House, Monks Walk
Chicksands
Shefford
Beds
SG17 5TQ

[REDACTED]
Our ref: P01012485

25 January 2019

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T&CP (Development Management Procedure) (England) Order 2015 & Planning (Listed Buildings & Conservation Areas) Regulations 1990

**LAND TO THE SOUTH EAST OF PROLOGIS PARK, MARSTON GATE,
BEDFORD, MK43 0XP
Application No. CB/18/04600/OUT**

Thank you for your letter of 17 December 2018 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

Summary

This application proposes the development of a large complex of storage buildings and associated infrastructure on open land to the north of the M1 motorway adjacent to the existing Marston Gate industrial site. This would bring large scale building into an area not previously developed, increasing the visual impact on the setting of several designated heritage assets at Brogborough, Ridgmont, Husborne Crawley and Apsley Guise but also impact on the historic complex at Segenhoe which has previously not been visually affected by either the industrial area or motorway. We consider this would result in harm to the historic significance of these designated heritage assets in terms of the National Planning Policy Framework.

Historic England Advice

This application concerns the development of Prologis Park Marston Gate II which would expand the existing logistics park to provide up to 166,000 square metres of B8 accommodation and associated uses, parking and access roads. The site lies in a shallow valley to the east of the main railway line and to the north of the M1



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motorway. The size of the site and the number and scale of the warehouse buildings proposed mean the development has the potential to affect the setting and significance of a number of designated heritage assets in the surrounding area. Historic England's advice relates principally to highly graded heritage assets.

Significance of Heritage Assets near the Application Site

Situated on a promontory on the south-east facing scarp of the Bedfordshire Greensand ridge to the north of the application site is the medieval ringwork at Brogborough Park Farm. It lies in the grounds of The Round House, a derelict 19th century building, listed grade II. The ringwork is a scheduled monument. They are rare nationally with only 200 recorded examples and less than 60 with baileys. As such, and as one of a limited number and very restricted range of Anglo-Saxon and Norman fortifications, ringworks are of particular significance to our understanding of the period. As a defensive structure its location on raised ground with views out over the adjacent valleys and countryside illustrates its function. Where the rural landscape survives, this retains the historic context of the site and contributes to its setting and significance.

Ridgmont village is predominantly linear village running north east to south west along a spur of the Lower Greensand Ridge overlooking the Marston Vale with the application site to its north. Much of the Ridgmont was developed by the Bedford Estate which gives the village the coherent character of an estate village. At the centre of the village is the Church of all Saints of 1854-5 by G. G. Scott. This is described as 'brilliantly exploiting its high position with a west tower and broach spire in a landscape where towers only are the norm' in the Buildings of England series by Charles O'Brien and Nikolaus Pevsner (page 271). It is a rural village, sited to take advantage of the topography and the surrounding countryside contributes to its significance and appreciation. It is designated as a conservation area and the church is listed grade II*.

Segenhoe lies to the south east of Ridgmont and was the historic site of the village. It now comprises a highly significant group of historic sites: the Manor House and the ruined church (both grade II*) and Maltings Spinney moat and earthworks (a scheduled monument). Like Ridgmont, these sites lie on high ground overlooking the valley and development site.

Segenhoe Manor is a very fine example of an early eighteenth century small gentry country house. It is built in the classical style, the façade forming a perfectly proportioned grid articulated by the equally well-proportioned sash windows. The centre of the building is emphasised to the north with a slight projection of the central bay and to the south with the closer spacing of the three central windows. Classical details ornament the central doorcases. It has a box-like verticality with the two principal floors set over a raised basement and the vertical character is continued in the tall chimneys flanking either side of the roof. The interiors are also very fine. The majority of rooms on the ground and first floors are fully panelled and a very decorative staircase with turned balusters, carved treaded and inlaid floor connects the two floors. The house is set on rising ground (emphasising its upright character) with a prospect over the landscape to the north, towards the application site. The



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landscape setting illustrates the function of the building as a country house and contributes to its appreciation. The house is listed grade II*.

Old All Saints Church, Segenhoe is a roofless, ruined church but the surviving walls and tower contain fabric from the twelfth to nineteenth centuries. This illustrates the long history of the building and how parish churches were often subject to many phases of work reflecting the importance of the building within the community. The church also illustrates ecclesiastical architectural design from these periods. It sits within its churchyard and forms part of a group with the neighbouring houses, the Manor and Maltings Spinney. The rural setting around the group tells the story of how the village was relocated and the new church at Ridgmont built in the nineteenth century. The countryside provides a quiet setting which accords with the religious and ruined character of the site. It is a scheduled monument and listed grade II*.

Maltings Spinney, situated to the south east of the application site, is a fine example of a medieval moated enclosure and the earthworks relating to its outer court and the cultivation of the adjacent land. The designation notes its importance is enhanced by being part of a well-articulated medieval complex including the nearby manor, deserted settlement and church. The moated site is now covered by woodland which to some extent filters views out from within that part of the monument. However, from the surrounding fields there are views out across the rural landscape. Although the landscape has evolved, the surviving rural character provides a continuum of the historic setting and contributes to the appreciation of the historic significance of the monument.

Husborne Crawley comprises of two conservation areas. The oldest part of the village around the Church of St. James at Church End lies on higher ground to the north. The conservation area appraisal for Church End notes its location at the eastern end of a greensand outcrop in a rural agricultural setting. It highlights the extensive views to the north and east and in particular those from the churchyard. It contains a fine group comprising the church, adjacent manor and nearby Crawley Park House. The church dates from the thirteenth century but was extensively remodelled in the early twentieth century. Like many historic churches it is prominently sited, reflecting the importance of the building to the community.

The eastern part of the Husborne Crawley conservation area consists of a linear settlement along the boundary wall of Woburn park with a succession of terraced model cottages built in the 1850s by the Bedford Estate and the village school at the northern end. The area is flanked by the trees behind the estate wall on its eastern side and open fields on the west and north and there are some views out of the village to the north east from School Lane towards the application site.

Apsley Guise conservation area is situated to the south west of the development site on the same ridge as Husborne Crawley. The centre of the village is based around a market place with the grade II* listed church of St Botolph set away from the village on a promontory at its northern side along with an informal scatter of historic buildings including the Old House, dating from 1575. The northern boundary of the conservation area is an informal one, with some mature trees and widely spaced



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properties. From parts of the village edge and the fields immediately beyond it the valley containing the application site can be seen.

The great historic estate of Woburn Abbey lies to the south of the development site. It comprises a grand Palladian mansion listed at grade I with flanking service courtyards and pleasure grounds lying within an extensive parkland landscape with numerous historic ancillary buildings and all showcasing the work of the country's leading architects and landscape designers from the seventeenth to nineteenth centuries. It is highly designated and park and buildings together form a very important historic landscape. As a major country estate the rural landscape surrounding the historic park illustrates the function of the estate and contributes to an appreciation of this aspect of its significance. From parts of the estate beyond the park there are views out across the wider landscape which both contribute to the design of the park and express the control of the estate over this land.

Impact on the Significance of Designated Heritage Assets

To the north of the proposed development site on steeply rising ground is the scheduled ringwork at Brogborough Park Farm. No illustrations have been produced of views that would be experienced from the higher parts of the earthworks or close to the monument so it is difficult to assess the full visual impact of the proposed development. However, viewpoint 10 (at Brogborough Middle Farm) is situated in the same line of sight but closer to the application site and on lower ground. This shows the existing building clearly, although partly broken up by planting in front of it. It also shows the proposed development as a line of tall buildings higher than the tree line and tall enough to obscure the ridge of high ground across the valley including St James' Church in Ridgmont. Views from or close to the Scheduled ringwork would be from a higher vantage point than viewpoint 10 which could reveal more of the new buildings, possibly part of the roofs, making a greater impact. However, it does appear from viewpoint 10 that the development would introduce extensive modern building of a type and scale alien to the building traditions of the rural landscape which the ringwork, because of its location, was intended to command. We are concerned that this would detract from an appreciation of the ringwork's historic function and harm its significance.

As has been described above, Ridgmont village has a linear form and views from the main road are generally framed by the buildings to either side, including in the direction of the application site. However, on the northern side, to the rear of the houses there are views in the direction of the development site as well as when approaching the conservation area from the north- west.

Though views from the north eastern side of the village are filtered by the Lowhill Plantation and both Lydds Hill and Station Road are sunk in hollow ways as they enter the village it is likely that the new development would be visible when experiencing the north eastern side of the village conservation area in the fields immediately adjacent to it. At the northern end of the conservation area there are more open views north-westwards towards the development site without wooded areas to filter them. No images have been produced to illustrate this effect but it seems likely the proposed buildings would be seen with Lowhill Plantation framing



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the view. This could erode the rural character of this part of Ridgmont's setting and result in harm to the significance of the conservation area.

While All Saints' church, Ridgmont, has an immediate setting which is constrained by building in the village to the north the distinctive spire of the church acts as a landmark within the surrounding countryside, as has been described above. It is clearly visible from the development site itself and the view of the church from here and from the surrounding countryside to the north illustrates the importance of the building to the community and enables its appreciation. The development would significantly compromise or potentially remove the ability to appreciate the church from this area to the northern side of the M1. While other views towards the spire may already be compromised by the motorway and existing industrial park, the expansion of the latter would significantly increase its visual presence in the landscape and detract from the rural setting of the church.

As noted above the principal elevation of Segenhoe Manor faces north-west in the direction of the development site. Set on raised ground and with the principal floors set on a raised basement it has a prospect over this land. From the other side of the valley, within the development site, the upper floors of the house are visible in the distance which suggests return views are possible. The front of the house is also clearly seen from the Ridgmont Road with few hedges and only occasional small trees between house and motorway. The motorway is at this point in a cutting so while it can be clearly heard cannot be seen from the house. The existing industrial buildings at Marston gate are also hidden by the land rising towards Ridgmont village. The result is to have left the Manor's setting surprisingly unaffected by this modern development.

During pre-application discussion with the applicants' agent we expressed concern that the proposed development might not only be visible from the immediate setting of the house but from the principle rooms on the first floor. We requested that visual impact assessment be carried out but it is disappointing that no images have been produced to illustrate either of these aspects. In the absence of visual material to illustrate the development from here is difficult to be clear about the extent to which the development would be visible from the house, gardens and surrounding area. However, viewpoint 13 shows a view from a point near Malting Spinney, to the east of the Manor. From here the proposed development would be screened by trees to the rear of the Manor, along the drive to the house and along the motorway. Even in summer these would not entirely screen the development, suggesting it would have an impact on the setting of Malting Spinney and its Scheduled moated site.

However, most of these trees would not appear in views from in front of the Manor. This lack of vegetation, closer proximity to the development site and the elevation position of ground and first floor principal rooms mean the visual impact on the landscape setting of the Manor could be pronounced. We are concerned that by eroding the landscape setting which illustrates the historical role of the house and contributes to its appreciation the proposed development would result in harm to its historic significance.



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The views from within the churchyard of Old All Saints Church, Segenhoe to the north are largely enclosed by the substantial boundary hedge. The tower is relatively modest in height and does not seem to be visible from the application site. However, there is potential for views from the gateway to the churchyard and the access lane. These would be over the same ground as those from the front of Segenhoe Manor and could have a similar effect on the church's rural setting. No illustrations have been produced to establish this impact.

Viewpoint 2 illustrates the proposed development from just north of the Husborne Crawley Church End conservation area. This shows that while the motorway and existing Marston Gate development is visible from here the scale of the proposed new building would further erode the landscape setting of the village. The parish church sits on higher ground and the churchyard to the east of the building opens out to provide expansive views across the countryside to the north east. These views include the motorway and existing development but otherwise comprise rural fields with the church at Ridgmont acting as a corresponding landmark to the east. The proposed development would extend the area of modern industrial building into this landscape compounding the visual impact on the setting. Viewpoint 3 is located in the eastern part of the Church End conservation area, beside the historic core of the village. This also illustrates how the proposed development would appear, extending large scale industrial development across part of the landscape, eroding the rural character of the countryside.

The eastern part of the Husborne Crawley conservation area includes the village school and the White Horse public house, important parts of the estate village, along with characteristic estate cottages at its northern end. Viewpoint 4 is located across School Lane from the conservation area boundary and shows how the proposed development would appear as a large, elongated built mass above the distant trees, extending development of a form and scale alien to the rural setting of the conservation area. This would detract from an appreciation of this setting and the contribution it makes to the significance of the conservation -area.

Viewpoint 1 is situated beyond the Apsley Guise conservation area but gives a helpful impression of how the historic settlement is sited on rising ground overlooking the valley to the north which includes the application site. As the image shows, the existing development is visible but the proposed would extend the development and have a greater visual impact. It seems likely that when leaving the conservation area to the north or passing along its boundary the proposed development would appear as a large, elongated built mass above the distant trees, bringing development of a form and scale alien to the rural setting of the conservation area and detracting from it.

Although there is an extensive belt of trees behind the estate wall along the northern edge of Woburn Park the trees are not densely planted and have high canopies of branches. There are therefore likely to be some gaps affording views towards the application site from the rising ground inside the boundary wall. During pre-application discussions we raised the possibility that further inside the park there might also be potential for views of the landscape beyond it due to the elevation of



the road running through the estate. In addition to this the agricultural landscape around the park adds to an understanding of Woburn as a major rural estate, as noted above. The application documents have not identified or illustrated these potential views from inside the walled park but viewpoint 5, taken from outside the park, shows how the new development would appear in views from the agricultural landscape which forms its setting. Viewpoint 4 is also a helpful illustration of this effect. The erosion of the rural landscape caused by the development would compromise the setting and significance of the estate.

Policy and Guidance Context

The Planning (Listed Buildings and Conservation Areas) Act 1990 establishes that in considering applications for planning permission for development which affect a listed building or its setting local planning authorities shall have special regard to the desirability of preserving the building or its setting (paragraph 66.1). Special attention shall also be paid to the desirability of preserving or enhancing the character or appearance of a conservation area in the exercise of any powers under the planning Acts (paragraph 72). In this case we would stress that the proposed development will affect the settings of Scheduled Monuments and grade II* listed buildings which fall within the top 5.5% of listed buildings nationally.

The National Planning Policy Framework (NPPF) states that the purpose of the planning system is to achieve sustainable development and that protection and enhancement of the historic environment is an overarching objective in this (paragraphs 7 and 8). The significance of listed buildings, conservation areas, registered historic parks and scheduled monuments can be harmed or lost by development in their setting. The NPPF states that clear and convincing justification should be made for any such harm and that 'great weight' should be given to the conservation of such designated heritage assets irrespective of the level of harm caused (paragraphs 193 and 194). This weight and the justification for harm should be especially convincing where harm to assets of a high grade of listing is concerned. Paragraph 200 also states that the Council should favour those proposals for development which preserve those elements of setting that make a positive contribution to the heritage asset or better reveal its significance.

The Practice Guide to the NPPF establishes that the setting of a listed building is the surroundings in which it is 'experienced' and that 'the contribution that setting makes to the significance of the heritage asset does not depend on there being public rights or an ability to access or experience that setting.' Moreover, the guide states that 'although views of or from an asset will play an important part, the way in which we experience an asset in its setting is also influenced by ... our understanding of the historic relationship between places.' It is important to consider setting in this way when development is proposed which, like the current application, is of a scale sufficient to have a visual impact on large areas of countryside in which multiple heritage assets lie, often visually interrelated to each other.

Historic England Position

Paragraph 189 of the NPPF requires applicants to describe the significance of heritage assets affected by proposed development and the contribution their setting



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might make to that significance. Sufficient information should also be provided to enable an understanding of the potential impact of the development on the asset. While the current application is accompanied by extensive documentation we have identified a number of areas in which insufficient evidence has been submitted to allow a full assessment of the visual impact of the proposed development and so satisfy the requirements of paragraph 189. We have commented on the possibility of the development being visible from inside Woburn park and we are particularly concerned by the lack of information on the visibility of the development from and near the Scheduled ringwork at Brogborough Park Farm and from near and inside Segenhoe Manor and Old All Saints' church. It is important that these are given further consideration and viewpoint images produced to illustrate the likely visibility of the proposed development as has been done with other locations.

While this additional information is important in satisfying paragraph 189 we have considered this application and on the basis of the information available. We are concerned that development of the application site would result in harm to significance of several designated heritage assets in the vicinity and not preserve those elements of setting that make a positive contribution to the assets and better reveal their significance in terms of the NPPF, paragraphs 193 and 200. In areas where the existing industrial development and M1 motorway are visible the proposed development would significantly increase the impact of large scale industrial building on the rural landscape including the noise and artificial lighting associated with it. We are concerned that this effect would degrade the setting of the Brogborough ringwork, Apsley Guise, Ridgmont and Husbourne Crawley conservation areas, including St James' parish church and the wider landscape setting of Woburn park. It could also affect views from inside the park boundary wall.

In addition, we are concerned that the new development would intrude into the setting of Segenhoe Manor, Old All Saints' Church and Matlings Spinney moated site, a group of assets which, because of the topography are relatively unaffected by views of either the existing Marston Gate buildings or the motorway. Key information on this impact needs to be submitted, but we are seriously concerned by the likely visual impact as well as intensification of noise and artificial light associated with the proposed development.

Because of the harmful impact on the setting and historic significance of these designated heritage assets we consider the development would not achieve the NPPF's overarching aim of promoting sustainable development. Paragraph 196 requires the Council to consider any public benefit which might be delivered by the proposals and weigh this against the harmful impact and seek clear and convincing justification for it. We would appreciate the opportunity to advise further once the additional information described above is available but would raise serious concerns about the application at this stage.

Recommendation

Historic England has serious concerns about the application on heritage grounds. We are concerned that there could be a harmful effect on the historic significance of



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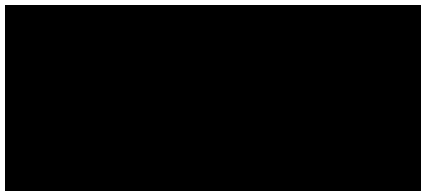


the Brogborough ringwork, Apsley Guise, Ridgmont and Husboune Crawley conservation areas, including St James' parish church, the wider landscape setting of Woburn park and views from inside the park boundary wall. It could also harm the setting of Segenhoe Manor, Old All Saints' Church and Matlings Spinney moated site, a group of assets which, because of the topography are relatively unaffected by views of either the existing Marston Gate buildings or the motorway. While further information is needed on some aspects of this impact we are concerned that development of the application site would not constitute sustainable development in terms of the NPPF.

We consider that the application does not meet the requirements of the NPPF, in particular paragraph numbers 7, 8, 189, 193, 194, 196 and 200. In determining this application you should bear in mind the statutory duty of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess and section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.

Your authority should take these representations into account in determining the application. If you propose to determine the application in its current form, please inform us of the date of the committee and send us a copy of your report at the earliest opportunity. Please contact me if we can be of further assistance.

Yours sincerely



Inspector of Historic Buildings and Areas



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