



Historic England

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Our ref: PL00028568  
Your ref:  
Date: 22 Feb 2018  
Direct Dial: 01223 582747

By email only to: [LocalPlan@centralbedfordshire.gov.uk](mailto:LocalPlan@centralbedfordshire.gov.uk)

Dear Planning Policy Team,

**Ref: Central Bedfordshire Council Local Plan Pre-Submission Draft and Sustainability Appraisal**

Thank you for consulting Historic England on the Central Bedfordshire Local Plan Pre-Submission Draft and Sustainability Appraisal. As a statutory consultee, our role is to ensure that the conservation of the historic environment is fully integrated into planning policy and that any policy documents make provision for a positive strategy for the preservation and enjoyment of the historic environment.

Our comments below should be read with reference to our previous response dated 14 August 2017.

**SUMMARY**

Under paragraph 182 of the National Planning Policy Framework ('The Framework') this Plan is unsound as it has not been positively prepared, is effective, or consistent with national policy. We have identified in detail below where we find the Plan unsound and what measures are needed to make the Plan sound. Please note that given some issues run throughout the Plan not all unsound policies have been labelled as unsound.

There is a lack of a detailed and proportionate historic environment evidence base underpinning the Plan and the Sustainability Appraisal. This is a particular issue for the identification of appropriate Strategic Site Allocations, therefore more detail has been provided on these policies.

Whilst we appreciate that the Plan should be read as a whole, in the absence of a strategic policy for the historic environment, awareness of the relevance of the historic environment is limited and could be missed. We have, therefore,



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recommended changes to specific strategic policies to address this omission to ensure that a positive strategy for the historic environment is embedded through the Plan. In particular we have recommended the inclusion of supporting text and specific policy references for heritage assets and identified mitigation in the Strategic Site Allocation section of the Plan.

## **DETAILED COMMENTS**

### **4: Vision and Objectives**

We repeat our previous comments that while we welcome the reference to heritage and settings in SO3, we recommend that the term “historic environment” is used. It would also be helpful to reference Heritage at Risk as part of a strategic objective. It is noted that the objectives are not labelled as a policy.

### **5: The Spatial Strategy**

We repeat our previous comments that whilst a Spatial Strategy Approach has been provided which includes provision to enhance and protect heritage, the term “historic environment” should be used rather than “heritage” in bullet point three. It is noted that the Spatial Strategy Approach is not labelled as a policy.

### **6: The Proposed Locations for Growth**

#### **Policy SP1: Growth Strategy**

We appreciate the role of Central Bedfordshire in the aspirations for growth between Cambridge, Milton Keynes and Oxford. Its location on the current and emerging strategic transport infrastructure network make it an ideal location for sustainable development.

However, the chosen strategic allocations and their capacity is not underpinned by an evidence base assessing landscape character (including historic environment character), impact on heritage assets, or capacity within the allocation for the proposed growth. As such, whilst there may be capacity for significant development within Central Bedfordshire, this has not been supported by an evidence-based approach to identifying potential allocations or determining their extent. This has resulted in strategic site allocations which are significantly harmful to the historic environment.

We note that there is a Site Assessment Technical Document (July 2017) which is not one of the technical supporting studies which are part of the current consultation. These site assessments were made at a standard 30 dwellings per hectare, regardless of contextual location with those sites over two hectares allowing 40% of the site for infrastructure. Appendix D contains the site assessments. For most sites, including many strategic sites, there is no mention of the historic environment. Where it is referenced, it provides scant analysis based on whether it is substantial harm or not. There is no consideration of cumulative harm to multiple heritage assets or the scale of what is judged to be, by implication, less than substantial harm.



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The Framework requires an adequate, up-to-date and relevant evidence base (paragraph 158). Specific evidence is required for the historic environment (paragraph 169) and, where there are major expansion options, assessments of landscape character (paragraph 170). Landscape character in historic environment terms is different to that of the natural environment, although there is overlap.

The strategic site allocations and future areas of growth have not been allocated with a proportionate evidence base, therefore we find these policies and allocations unsound. With many of the proposed allocations, the lack of evidence underpinning the Sustainability Appraisal and policy framework could be rectified resulting in amended allocation boundaries and specific policy direction to aid developers. Going forwards into the partial review, a strategic assessment of where there is capacity for growth within the landscape, given the environmental designations in the area is critical to achieving sustainable development.

## **Policy SP2: National Planning Policy Framework – Presumption in Favour of Sustainable Development**

We reiterate our previous comments that reference back to the meaning of sustainable development as defined by the NPPF is welcomed. We question the need to include the third paragraph of this policy. We would suggest that the matter of out of date policies is adequately addressed in the legislation and does not need to be re-iterated here. If for example the NPPF was updated and rendered a Local Plan policy out of date, then that in itself would be a material consideration and would be covered by the second paragraph of the policy and indeed section 38 of the Planning and Compulsory Purchase Act.

## **7: Implementation**

### **SP3: Generic Requirements for Strategic Sites**

Whilst we welcome the references to masterplans, integration and local context in this policy; the absence of the historic environment in this strategic policy is a significant omission. The lack of a strategic policy for the historic environment places undue reliance on the individual policies within the plan and, more importantly, means that the plan does not set a positive strategy for the historic environment as the suite of policies currently are drafted.

For this overarching site specific policy for strategic allocations, given the historic environment impacts set out below, we would expect to see a requirement for heritage impact assessments for each site which guide development briefs and masterplans. These assessments should guide development is coming forward so that all effort is made to avoid harm to the historic environment through the masterplanning and design of the site and, where this is not possible, mitigation measures are put in place.

Given that the policy specifies equivalent measures for transport and green infrastructure, we find that the policy is unsound owing to the lack of protection of and positive strategy for the historic environment in these strategic site allocations.



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## 7.7 Site Specific Allocation Policies

The use of standard text for the historic environment in all the strategic site allocation policies is inappropriate. Each site has different historic environment impacts and these should guide the provision for the historic environment within the policy. Where small textual amendments are suggested below to strategic site allocation policies, this does not mean that these amendments will make the policy sound, given the generic nature of the text.

### Policy SA1: North of Luton

This allocation affects a number of designated and non-designated heritage assets which are not identified in the policy or on the allocation map. There is no supporting text with this policy. Whilst we welcome that there are specific measures for the historic environment in this policy, their content, the lack of contextual information and the absence of a requirement in policy SP3 for a heritage impact assessment means that the historic environment is vulnerable to inappropriate development. As currently drafted we find the policy unsound.

#### THE ASSETS

As previously noted, a number of the heritage assets which could be affected by development in this area are of high significance, particularly the scheduled monument of Dray's Ditches and the landscape associated with Sundon Manor (which is also known as Sundon Park). Dray's Ditches (which stretches east and west of the A6 on the urban edge of Luton), is a designated heritage asset of the highest significance and constitutes a substantial Iron Age boundary earthwork. Sundon Park remains largely unaltered since the early 19th century, with a 17th/18th century park laid over a medieval landscape. There are many important archaeological features, including the buried remains of the former manor house, several parkland earthworks and areas of ridge-and-furrow (the latter forming a scarce resource within Central Bedfordshire). Within the immediate vicinity of Sundon Park are a shrunken medieval village and the remains of a medieval deer park. Some features remain enigmatic and would benefit from further field evaluation, such as a large polygonal earthwork within the centre of Sundon Park that could have had a variety of purposes.

The significance of Sundon Park therefore derives from the ensemble of features which make up the overall heritage asset, which provide an insight into manorial life in the medieval and post-medieval periods. It has considerable value due to its archaeological and historic interest, and has the potential to reveal additional features of interest. The significance of Sundon Park also derives from its setting, which remains predominantly rural despite the proximity of Luton.

The park occupies higher ground above the town and forms part of the backdrop to the village of Lower Sundon as well as the nearby Chilterns AONB. Sundon Park in itself contributes to the significance and setting of designated heritage assets; including the grade I listed Church of St Mary and three grade II listed buildings to the



north. A Historic England Archaeological Desk-based Assessment of Sundon Park (Series n<sup>o</sup> 54-2012) is available in our research database here: <http://research.historicengland.org.uk/>

Bordering the proposed allocation is the aforementioned grade I Church of St Mary's at Lower Sundon. Given the proximity of the site to the church, coupled with proposed allocation SE1 (see below) M1 Junction 11a Sundon Rail Freight Interchange, there is significant potential cumulative harm to the setting and significance of the church.

## THE POLICY

Negative impacts on the heritage assets affected by this proposed allocation depend on the proximity, design and mitigation of built development and the location of the M1-A6 link road. Positive impacts could be made through bringing Sundon Park into public use and the protection of the setting of Drays Ditches as part of the wider green infrastructure provision.

The identification of green infrastructure to mitigate the visual impacts of development upon the significance of heritage assets in point 7 is welcomed, subject to the addition of, *"...and the significance of heritage assets and their setting."*

Point 9 covers the proposed A6 to M1 junction 11a link road. We note that the policy proposes, *"...no undue impact on the AONB, heritage assets and biodiversity and provides for the mitigation and enhancements where feasible."* Again, we would request that the policy reads, *"...heritage assets and their setting..."*

Whilst we welcome point 10 covering non-designated heritage assets of archaeological interest, the policy makes the assumption that the appropriate mitigation is preservation through record. For the reasons set out above, this is unlikely to be an appropriate course of action for such a highly significant site which may have the potential to trigger paragraph 139 of the National Planning Policy Framework.

Point 11 states that harm to the significance of designated heritage assets within the site boundary and the setting of designated heritage assets nearby will be mitigated. Therefore, the allocation for in the region of 4,000 homes and a minimum of 20 hectares of employment land is beyond the capacity of the allocation to deliver whilst maintaining sustainable development given the number of environmental assets in and surrounding the proposed allocation.

This leads us to conclude that without an analysis of the capacity of the site and a heritage impact assessment, this allocation is unsound. We note that an Urban Capacity Report (July 2017) forms part of the evidence base but that it's limited coverage does not include detailed analysis of the proposed strategic site allocations in context. Although it is worth highlighting how critical contextual understanding of a site and its capacity is. As the report also identifies at paragraph 3.10, the average Victorian terrace density is 60-80 dwellings per hectare.



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If this allocation and policy is brought forward we would expect to see all the points raised relating to Policy SP3, SA1 and supporting text to be addressed in order that due consideration is given to the historic environment.

## SUSTAINABILITY APPRAISAL

For the reasons set out above we disagree with the assessment in Appendix VIIa of the Sustainability Appraisal (page 12) that the allocation of this site would have neutral or uncertain effects on the historic environment.

### **Policy SE1: M1 Junction 11a – Sundon Rail Freight Interchange (RF1)**

This proposed allocation needs to be reviewed to understand its cumulative impacts on the historic environment along with SA1. The site is within the setting of the grade I Church of St Mary's at Lower Sundon which also borders proposed allocation SA1. Therefore, there is significant potential cumulative harm to the setting and significance of the church.

We welcome the reference to heritage assets within the policy. We reiterate our earlier comments that references should read, "...*heritage assets and their setting*..." However, we would question how the allocation of the Rail Freight Interchange, in the words of the policy, "...*will:...preserve and enhance heritage assets within and around the site*..." and recommend that this bullet point is expanded to cover this aspect, given the cumulative effects detailed in SA1 and SE1.

## SUSTAINABILITY APPRAISAL

The Sustainability Appraisal Appendix VIIa assesses this site as having a neutral effect on the historic environment (page 58). The cumulative effects of allocating this site and SA1 have not been assessed. As such, and given the points raised above in relation to SE1 and SA1, we disagree with the overall assessment relating to the historic environment.

### **Policy SA2: Marston Vale New Villages**

This allocation affects a number of designated heritage assets which are not identified in the policy or on the allocation map. There is no supporting text with this policy.

We find this proposed allocation unsound on principle. The multiple highly designated heritage assets directly affected by this site and their landscape would be irrevocably harmed by the introduction of development of this scale.

Despite this assessment, if the proposed allocation is taken forward, we find the policy as currently drafted unsound. Whilst we welcome that there are specific measures for the historic environment in this policy, their content, the lack of contextual information and the absence of a requirement in policy SP3 for a heritage impact assessment means that the historic environment is vulnerable to inappropriate development. This site should not be allocated without a heritage



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impact assessment and capacity study setting out where, if anywhere, a new village/s can be sited without harming the designated heritage assets.

## THE ASSETS

Grade II\* the Moat Farmhouse sited within the scheduled Moat Farm moated enclosure border the site allocation. The house dates to the early C15 with C16 alterations and was restored in 1880. Moat Farm survives in a very good condition and is one of the finest examples of a single island moated site in Bedfordshire. The importance of the monument is enhanced by the direct association between the moated site and a range of well-preserved earthworks which include the remains of part of a contemporary settlement. The relationship between these two aspects of the monument provides important evidence for the social and economic development of the overall site, illustrating both the interdependence of these contrasting forms of settlement and the disparity between the lifestyles of the inhabitants.

We note the omission from the proposed site allocation of grade II Thrupp End Farmhouse and the scheduled medieval village and moated sites at Thrupp End which are to the south of Moat Farm. Given that the proposed site essentially encircles these designated heritage assets using the boundary of the scheduled monument, the fact that they are omitted from the allocation is immaterial. Thrupp End medieval settlement is a good example of a Bedfordshire deserted village associated with a high status manorial residence. Although modified by ploughing the monument retains considerable potential for the preservation of structural remains within the settlement and the moated areas. The monument currently has a well-preserved setting which highlights the isolation and agricultural nature of these settlements. Including the monument within this allocation without adequate policy protection has the potential to completely remove its setting and, therefore, harm the significance of the scheduled monument. Its relationship with the scheduled site at Moat Farm is a further consideration. More information on the extent of the site can be found here: <https://www.historicengland.org.uk/listing/the-list/list-entry/1010364>

We note the omission from the proposed site allocation of grade II The Roundhouse and the scheduled ringwork at The Roundhouse, Brogborough Park Farm. Given the proposed allocation completely encircles these designated heritage assets using the boundary of the scheduled monument; the fact that it is omitted from the allocation is immaterial. Ringworks are medieval fortifications built and occupied from the late Anglo-Saxon period to the later 12th century. They are rare, with only 200 recorded examples nationally and less than 60 with baileys, like here at Brogborough. Whilst the setting of these designated heritage assets had been affected by mining, it has been restored.

Also bordering the proposed allocation are the grade I Church of St Mary the Virgin and the separate grade I Tower belonging to St Mary the Virgin. Both the Church and the Tower are designated at Grade I in part for its group value with other surviving elements of medieval Marston Mortaine, including the Grade II\* listed Moreteyne Manor, and the scheduled moat and medieval settlement earthworks. The setting and significance of this church and tower draw from this medieval landscape



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We would note that several grade II buildings are in the immediate vicinity of the proposed allocation.

## THE POLICY

Whilst we welcome point 6 covering non-designated heritage assets of archaeological interest given the archaeological potential of the area, the policy makes the assumption that the appropriate mitigation is preservation through record. For the reasons set out above, this is unlikely to be an appropriate course of action for such a highly significant area which may trigger paragraph 139 of the National Planning Policy Framework.

Point 7 states that harm to the significance of designated heritage assets within the site boundary and the setting of designated heritage assets nearby will be mitigated. Therefore, the allocation for in the region of 5,000 homes and a minimum of 40 hectares of employment land is beyond the capacity of the allocation to deliver whilst maintaining sustainable development given the number of environmental assets affected by the proposed allocation.

This leads us to conclude that without an analysis of the capacity of the site, a landscape assessment and a heritage impact assessment to inform the allocation, the allocation of the site in its current form is unsound. If, based on evidence, an allocation is possible, we would expect to see the points raised relating to Policy SP3 and SA2 above to be addressed in the policy and supporting text in order that due consideration is given to the historic environment.

## SUSTAINABILITY APPRAISAL

Without further evidence whether the effects are major or minor negative cannot be confirmed (page 37 Sustainability Appraisal Appendix VIIa).

### **Policy SE2: M1 Junction 13 – Marston Gate Expansion**

This allocation affects grade II Ridgmont Station and the setting of a number of designated heritage assets which are not identified in the policy or on the allocation map. There is no supporting text with this policy.

## THE ASSETS

Grade II Ridgmont Station borders the proposed allocation at its western edge. To the north of the site is the scheduled Ringworks and grade II The Roundhouse, detailed above. To the south west of the site there are a number of listed buildings in Husbourne Crawley (including grade II\* Crawley House), to the south a number in Ridgmont (including grade II\* All Saint's Church), and to the south east a collection of highly designated heritage assets in Segenhoe (grade II\* Segenhoe Manor, scheduled and grade II\* All Saint's Church, and the scheduled Maltings Spinney). Also to the south are the grade I Registered Park and Garden of Woburn Abbey and a collection of grade II listed buildings along Mill and Turnpike Roads.



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Whilst we note the 8 hectares of screening and landscaping mitigation proposed in the policy, the up to 35 hectares of warehousing and distribution provision would have an intrusive presence on what is a flat landscape. Given the average height and standard palette of materials for warehousing, we would expect an assessment of the impact of allocating this site in the landscape and, should it be allocated, design mitigation measures included within the policy. Any landscape assessment should look both to the landscape character assessment, but also to the historic environment landscape value in terms of setting and significance, which can be missed in assessments. In addition, we would expect an assessment of views, including elevated views from properties, from highly designated heritage assets. These include All Saint's Church in Ridgemont, All Saint's Church in Segenhoe, Segenhoe House, Maltings Spinney, Crawley House, and Woburn Registered Park and Garden.

## SUSTAINABILITY APPRAISAL

The assessment of neutral / unknown effect on the historic environment in the Sustainability Appraisal Appendix VIIa (page74) is based on a distance-based assessment. The topography of the area and the type and location of designated heritage assets indicate that this assessment does not provide a full assessment of impact. It is important to understand the significance of any heritage assets, and their settings, that would be affected by a potential site allocation. This involves more than identifying known heritage assets within a given distance, but rather a more holistic process which seeks to understand their significance and value. Whilst a useful starting point, a focus on distance or visibility alone as a gauge is not appropriate. An allocation at a considerable distance away from a heritage asset may cause harm to its significance, reducing the suitability of the site allocation in sustainable development terms.

We also would note that any cumulative impacts owing to the proximity of SA2 also have not been considered. As potential negative impacts on the historic environment have not been assessed, we cannot agree with the assessment of neutral/unknown.

### **Policy SA3: East of Arlesey**

This allocation affects a number of designated heritage assets which are not identified in the policy or on the allocation map. There is no supporting text with this policy.

## THE ASSETS

Two grade II listed buildings are on the border of the proposed allocation in Arlesey – Green Farmhouse and Church Farmhouse. They will be severed from what remains of their context through potentially being surrounded by development. The proposed site is bordered in Fairfield by the grade II Fairfield Hospital and the grade II Church at Fairfield Hospital. The site also projects round Fairfield towards the grade II Isolation Hospital which, because its function, is set on the edge of the settlement.



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## POLICY

We note the policy requirement in 1b for a country park on the eastern edge of the allocation to maintain some degree of separation between Arlesey and Fairfield Park.

Whilst we welcome point 5 covering non-designated heritage assets of archaeological interest given the archaeological potential of the area, the policy makes the assumption that the appropriate mitigation is preservation through record. This may not be appropriate.

Points 6 and 7 cover harm to designated heritage assets within and in the vicinity of the proposed site. Neither point refers to setting of heritage assets, as identified previously. This omission is important given the potential impact on significance through development within the settings of heritage assets identified above.

## SUSTAINABILITY APPRAISAL

The Sustainability Appraisal Appendix VIIa (page 25) does not identify that the two listed farmhouses in Arlesey will be severed from their settings by the proposed allocation. As such, we disagreed with the assessment that the effect will be neutral/unknown.

### **Policy SA4: East of Biggleswade**

This allocation affects a number of designated heritage assets which are not identified in the policy or on the allocation map. There is no supporting text with this policy.

## THE ASSETS

To the south of the allocation is the scheduled monument Stratton Park moated enclosure and association manorial earthworks. This site includes a fine example of a Bedfordshire moated enclosure, importantly associated with the well-preserved remains of contemporary manorial out-works and building platforms. The flat island is slightly raised above the surrounding land.

Also affected are the scheduled Newton Bury moated site to the south east, grade II Sunderland Hall farmhouse to the north east; and to the north the Sutton Conservation Area, the grade I Church of All Saints, scheduled and listed grade II\* Sutton Packhouse Bridge, and a number of grade II listed buildings. To avoid repetition, please see our comments below on 7.9 Identified Locations for Future Growth regarding these sites.

## POLICY

Whilst we welcome point 5 covering non-designated heritage assets of archaeological interest given the archaeological potential of the area, the policy makes the assumption that the appropriate mitigation is preservation through record. This may not be appropriate.



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We note point 7 states that, “...*relevant and reasonable measures to preserve those assets [all designated heritage assets] and their settings...*” However, as the affected assets have not been identified in the policy or supporting text, this part of the policy is ineffective. The policy also assumes that mitigation is the first stage of dealing with harm to heritage assets rather than designing out harm.

## SUSTAINABILITY APPRAISAL

Without further evidence whether the effects are major or minor negative, the assessment of minor/unknown cannot be confirmed (Sustainability Appraisal Appendix VIIa, page 48).

### **Policy SE3: A1 Corridor Holme Farm, Biggleswade**

This allocation affects a number of designated heritage assets which are not identified in the policy or on the allocation map. There is no supporting text with this policy.

## THE ASSETS

The Sustainability Appraisal Appendix VIIa (page 66) states that a listed building is within the proposed allocation. The mapping is unclear, so we are assuming this refers to the grade II Spring Water Pumping Station, Engine House and Pump Master’s House. The Walls and Gates are listed separately at grade II. It would be helpful to clarify in the policy and supporting text which assets are directly affected, particularly as these assets will also have a group value. Immediately to the north of the site is grade II Holme Grove and to the east of the site is the scheduled Holme Mill Iron Bridge. The landscape is flat therefore views from Landford, where there are a number of listed buildings should be considered. We note that there are a number of wind turbines in this location.

## POLICY

The policy does not refer to the heritage assets and there is no supporting text. As such the historic environment is not protected.

## SUSTAINABILITY APPRAISAL

The Sustainability Appraisal Appendix VIIa (page 66) does not identify all the heritage assets potentially affected by the development. Specifically there are three list entries for multiples of buildings either within or adjacent to the proposed site. As such we cannot support the assessment of neutral/unknown.

### **Policy SE4: Former RAF Base, Henlow**

This allocation affects a number of designated heritage assets which are not identified in the policy or on the allocation map. There is no supporting text with this policy.



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## THE ASSETS

RAF Henlow was established in 1917. It was one of a very small number of airfields retained after Armistice in November 1918. In 1924 it became the permanent home until 1965 of the School of Aeronautical Engineering and was one of the RAF's largest bases by 1940. Notably Frank Whittle was a student in 1932. The site current has three sets of buildings listed at grade II: Building 190 (Coupled General Service Shed), Buildings 186,187, 188 AND 189 (Aircraft Hangers), and Buildings 370 WITH 330 (Officer's Mess). More information can be found here: <https://www.historicengland.org.uk/listing/the-list/list-entry/1391623>, <https://www.historicengland.org.uk/listing/the-list/list-entry/1391624>, and <https://www.historicengland.org.uk/listing/the-list/list-entry/1391625>. The designated and non-designated heritage assets on this site have a group value which needs to be considered as part of any potential allocation.

We would note that immediately adjacent to the site are grade II\* Old Ramerick Manor and grade II 190 Hitchin Road and the effect on their significance of development within their settings should be considered as part of this allocation. There also are numerous designated heritage assets in the surrounding settlements which have the potential to be affected by development on this scale.

## POLICY

We note the policy requirement that, *"[d]evelopment proposals must ensure the protection of all listed buildings, their setting and important views within the site..."* This does not consider the interrelationship between RAF Henlow and the surrounding landscape, settlements and designated heritage assets outside of the site. The lack of even generic policy provision or supporting text is particularly noticeable for this site.

If this is taken forward as an allocation we would suggest that any future masterplan could seek to reflect the site's former use as an airfield. Good interpretation of the aerodrome's heritage significance and history may help to make sure that future development reflects this important history. Part of the strategy for interpretation might include reflecting the layout of the aerodrome in the masterplan eg street patterns and open space naming streets or parks and buildings after names associated with the aerodrome. Good examples of masterplanning following this approach may be found at Alconbury and Waterbeach in Cambridgeshire.

## SUSTAINABILITY APPRAISAL

We could not find a detailed assessment in the Sustainability Appraisal Appendix VIIa. In the overview table (page 51) the historic environment assessment is unknown. We would expect to see more detailed evidence and assessment for the site to be brought forward as an allocation.



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## **Policy HA1: Small and Medium Allocations**

We have been unable to check in site in detail, however it is clear that the small and medium sites have similar issues with lack of evidence or consideration for the historic environment and lack of details within the policy and supporting table.

There are a number of sites, listed below, which require further consideration. Their inclusion on the list does not automatically mean that they should not be allocated, neither does omission from this list mean that there are no historic environment issues. We note at least two proposed allocations where listed farmhouses will be surrounded by development thereby losing their setting and context.

HAS04

HAS05

HAS06

HAS07

HAS09 (we particularly note the impact on grade II Yew Tree Farmhouse)

HAS12

HAS14 (we particularly note the impact on grade II Moor End Farmhouse)

HAS16

HAS24

HAS26

HAS27

HAS28

HAS35

HAS40 (we particularly note its proximity to grade II registered landscape at Moggerhanger and that it encircles two grade II listed building groups)

HAS41

HAS45

HAS48

## **7.9 Identified Locations for Future Growth**

### **West of Luton**

Historic England has concerns regarding development in this location and the potential impact upon the setting of collection of grade I, II\* and II buildings at Luton Hoo, grade II\* Luton Hoo registered park and garden, grade II Stockwood Park stables and landscape, and other grade II buildings in the vicinity. As set out above, we would expect any proposed allocation in this area to be based on evidence including a heritage impact assessment and capacity study.

### **North, South and East of Tempsford (east of the A1)**

There are a number of designated and non-designated assets in the area. A Heritage Impact Assessment will need to carefully consider the potential for development to impact upon these assets. In carrying out an assessment we would refer you to two publications which may be of use in assessing this site. The first,



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<https://www.historicengland.org.uk/images-books/publications/nine-thousand-miles-of-concrete/> is essentially an audit of airfields. Tempsford is mentioned and is rated 2 (low grade). The rating is weighted in favour of original buildings and structures with the percentage of original structures remaining and state of repair being taken into account. It is worth noting in Tempsford's case that it does have a historically significant structure remaining in the 'barn' used by SOE Agents before flying out into enemy territory. Therefore we also would recommend that standard investigation would be needed to establish in any earlier airfield remains lie beneath the surface. The other publication we would highlight is: <https://content.historicengland.org.uk/images-books/publications/historic-military-aviation-sites/heag048-historic-military-aviation-sites.pdf/>.

We also would refer you to our comments above on RAF Henlow about the role of masterplanning airfields. These comments are equally applicable to Tempsford if any part of it is brought forward as an allocation.

### **Land East of Biggleswade (east of proposed allocation, south of Sutton, west of Dunton)**

This area includes scheduled Newton Bury Moated Site and grade II Sunderland Hall Farmhouse. The moated site at Newton Bury is a well-preserved example of a small, double- island type which retains evidence of the water management system. Despite alterations to the monument, particularly the infilling of sections of the ditches and the later use of the moated enclosures as a farm, the major part of the site has survived with minimal disturbance. Environmental evidence will be preserved in the silts within the ditches, and the islands will contain evidence of the original buildings. The monument lies in an area where moated sites are particularly numerous enabling chronological and social variations to be explored. The existence of historical records relating to the ownership of the site further enhances its importance. More information on Sunderland Hall Farmhouse can be found here: <https://www.historicengland.org.uk/listing/the-list/list-entry/1114482>

A number of designated heritage assets in Sutton also would be affected by this indicative area of future growth. We would particularly highlight the scheduled and listed grade II\* Packhorse Bridge is medieval with later repairs, more information can be found here: <https://www.historicengland.org.uk/listing/the-list/list-entry/1321630>. The information on grade I Church of All Saints can be found here: <https://www.historicengland.org.uk/listing/the-list/list-entry/1138081>. Considerations relating to scheduled Strattons Park Moated Site have been set out above at Policy SA4. As set out above, we would expect any proposed allocation in this area to be based on evidence including a heritage impact assessment and capacity study.

### **Apsley Guise (North of the Railway Line)**

Historic England has concerns regarding development in this location and the potential impact upon the setting of Woburn Abbey through views from the registered landscape, the setting of a number of churches and the Brogborough Ringwork scheduled monument. As set out above, we would expect any proposed allocation in



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this area to be based on evidence including a heritage impact assessment and capacity study.

### **Policy SA5: Houghton Regis Strategic Allocation**

This allocation affects a number of designated heritage assets which are not identified in the policy or on the allocation map. There is no supporting text with this policy.

Whilst we note that outline planning permission has been granted for the Houghton Regis North Strategic Allocation, we would still expect the policy and supporting text to set out specific details, in particular identifying the Thorn Spring scheduled monument. As currently drafted, we note the generic bullet points relating to heritage assets within the policy for both site 1 and site 2.

### **8: Green Belt, Coalescence and Settlements**

#### **Policy SP4: Development in the Green Belt**

Given our fundamental comments on the site allocations and their evidence base, we have not been able to review the new technical study on the Green Belt, nor have we made any assessment about the release of any Green Belt land that is proposed.

#### **Policy SP5: Preventing Coalescence and Important Countryside Gaps**

We welcome this policy which should be of benefit to the historic environment. The policy would be strengthened if the benefits associated with the historic environment were more explicitly articulated in the policy and supporting text.

### **11: Housing**

#### **Policy H8: Assessing planning applications for Gypsy and Traveller sites.**

We suggest that this policy is amended have regard to the wider landscape and historic environment.

#### **Policy H9: Assessing planning applications for travelling show people sites**

We suggest that this policy is amended have regard to the wider landscape and historic environment.

### **12: Employment**

#### **12.9 Rural and Visitor Economy**

We welcome the amendments in paragraph 12.9.3 following our previous comments.



## **Policy EMP4: Rural and Visitor Economy**

We welcome the amendments to the policy following our previous comments.

### **13: Retail and Town Centres**

#### **Dunstable Town Centre**

We welcome the amendments in paragraph 13.4.6 which responds to some of our previous comments.

#### **Policy R3: Town Centre Development**

We welcome the amendments to the policy following our previous comments.

### **14: Transport**

#### **Policy T2: Highway Safety and Design**

We would reiterate our previous comments that the policy should include reference to the need for development to have regard to the historic environment. There are also opportunities which could be recognised in the policy, for example encouraging alternatives to car use can result in the removal of redundant highway furniture and reduction or removal of road markings which can have positive impacts upon the historic environment.

### **15: Environmental Enhancement**

We would request that reference to the role the historic environment and heritage plays in contributing to the valued character and nature of the area is specifically included alongside landscape, ecology, and settlement pattern.

Paragraph 15.1.3 outlines the need for development to protect and enhance the environment. This is a welcome inclusion but it is recommended that it refers to both the built and natural environment. Both the Council's Environmental Framework and Design Guide are referred to throughout this chapter. Both of these documents contain dedicated sections on the historic environment which is helpful and further supports the need to have a reference to the historic environment at this point in the Plan.

Paragraph 15.2.1 specifies the historic environment falls within the remit of Green Infrastructure considerations which is welcomed.

#### **Policy EE1: Green Infrastructure**

We support the inclusion of a Green Infrastructure policy. We would recommend that the policy is amended to refer to the function that Green Infrastructure can have in enhancing and conserving the historic environment. The policy refers to the enhancement of landscape character, it is suggested that the historic environment is



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also considered here. Green Infrastructure can be used to improve the setting of heritage assets and to improve access to it, likewise heritage assets can help contribute to the quality of green spaces by helping to create a sense of place and tangible link with history.

## **15.6 Landscape Character and Value**

In paragraph 15.6.1 we recommend reference to '*historic environment*' rather than '*historic*'. We would note that landscape character assessments, particularly those accommodating major developments, can be deficient in assessing the landscape value relating to scheduled monuments and their settings. The historic environment's role in landscape character could be more explicit in paragraphs 15.6.6 and 15.6.7. We welcome the section on valued landscapes and the explanation in 15.6.9. Again, we request that a reference to '*historic environment*' rather than '*historic*' is made.

### **Policy EE5: Landscape Character and Value**

We welcome the inclusion of this policy and the requirement for landscape enhancement. It is recommended however that the policy be expanded to refer to the role the historic environment has to play in understanding the landscape. Many tracks, green lanes, field boundaries and settlement patterns are remnants of past use and provide evidence of how the landscape has evolved over time. The objective of protecting and enhancing the landscape and recognition of its links to cultural heritage can help improve how the historic environment is experienced and enjoyed.

### **Policy EE6: Tranquillity**

We support the inclusion of this policy. The aural atmosphere can be an important aspect of the historic environment and can affect how it is experienced and understood. The policy could be strengthened by referencing the benefits that this consideration can bring to the conservation and enhancement of the historic environment.

### **Policy EE13: Outdoors sport, leisure and open space**

We welcome the amendments to the policy following our previous comments. We note that the policy refers to '*heritage*'. As noted in our previous comments, '*historic environment and setting*' is the recommended terminology.

### **Policy EE14: Applications for Minerals and Waste Development**

The policy should outline how the Council expects high quality site restoration and aftercare to be secured, it is likely this will occur via the imposition of a suitably worded condition or via a legal agreement.

Neither the supporting text nor the policy make reference to the historic environment and the potential impacts that mineral extraction and waste developments can have upon it, particularly in relation to archaeology. It is requested that this policy is



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amended to have consideration of the impacts upon the historic environment and to have regards for its conservation and enhancement.

## **16: Climate Change and Sustainability**

### **Policy CC1: Climate Change and Sustainability**

We would recommend that the policy is made clearer as the term *'any new development'* could include extensions or other work to heritage assets. A sustainable approach should secure a balance between the benefits that such development delivers and the environmental costs it incurs. The policy should seek to limit and mitigate any such cost to the historic environment.

Listed buildings, buildings in conservation areas and scheduled monuments are exempted from the need to comply with energy efficiency requirements of the Building Regulations where compliance would unacceptably alter their character and appearance. Special considerations under Part L are also given to locally listed buildings, buildings of architectural and historic interest within registered parks and gardens and the curtilages of scheduled monuments, and buildings of traditional construction with permeable fabric that both absorbs and readily allows the evaporation of moisture.

In developing policy covering this area you may find the Historic England guidance *Energy Efficiency and Historic Buildings – Application of Part L of the Building Regulations to historically and traditionally constructed buildings* <https://content.historicengland.org.uk/images-books/publications/energy-efficiency-historic-buildings-ptl/heag014-energy-efficiency-partL.pdf> to be helpful in understanding these special considerations.

### **Policy CC2: Renewable Energy Development**

We welcome the requirement for development to have no unacceptable impacts upon heritage assets, sensitive landscapes and townscapes. It is recommended that the policy is amended to use the term *'historic environment and its setting'* rather than *'heritage assets'*.

## **17: High Quality Places**

### **Materials and Detailing**

Paragraph 17.1.10 would benefit from consideration of streetscape, particularly given the issues of connectivity and traffic management is an area for exploration. For streetscape improvements we would refer you to the Streets for All publications which are currently out for consultation: <https://historicengland.org.uk/images-books/publications/streets-for-all/>. These documents provide updated practical advice for anyone involved in planning and implementing highways and other public realm works in sensitive historic locations. It sets out means to improve public spaces without harming their valued character, including specific recommendations for works



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to surfaces, street furniture, new equipment, traffic management infrastructure and environmental improvements.

The advice draws on the experience of Historic England's planning teams in the development of highways and public realm schemes. Case studies show where highways works and other public realm schemes have successfully integrated with and enhanced areas of historic or architectural sensitivity. Please also see our advice for highways engineers and designers:

<https://historicengland.org.uk/advice/caring-for-heritage/streets-for-all/highway-engineers-and-designers/>.

### **Policy HQ1: High Quality Development**

In the sixth bullet point we recommend this amendment, “...to the existing natural, built and historic environment...”

### **Radio and Telecommunications**

This section should make reference to the impact that siting of communications equipment can have on the historic environment. The Cabinet Siting and Pole Siting Code of Practice provides more advice:

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/59027/2/Revised\\_Cabinet\\_and\\_Pole\\_Siting\\_COP\\_Nov\\_16.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/59027/2/Revised_Cabinet_and_Pole_Siting_COP_Nov_16.pdf)

### **Policy HQ7: Public Art**

We request that this policy is amended to have regard to the historic environment and its setting. There is also an opportunity to acknowledge the potential of the historic environment to innovate and inspire public art and to improve local knowledge and links to local heritage.

### **Policy HQ11: Modern Methods of Construction**

This policy is likely to refer to new build developments only but that is not clear and could be interpreted as applying to all developments of all scales. The use of modern construction techniques on a listed building for example, may detrimentally affect existing historic fabric elsewhere in the building therefore risking damage to the heritage asset contrary to the objective of the NPPF to conserve and enhance the historic environment. It is recommended that the policy is clarified as at this stage as it's remit is unclear to prospective applicants and decision makers. Please also see our comments to Policy CC1.

### **18: Historic Environment**

We welcome the references, following our earlier comments to heritage at risk in the supporting text and policies. We request that references to Historic England's Heritage at Risk Register do not include '@'. We would welcome a reference to how the chapter integrates with the chapter on Environmental Enhancement.



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As an overarching point, given the references to non-designated heritage assets in the policies, a local list or other mechanism for recording archaeology, landscapes, buildings and areas of local importance would be welcomed to support the policies. Historic England has published guidance pertaining to Local Listing which you may find helpful: <https://historicengland.org.uk/images-books/publications/local-heritage-listing-advice-note-7/> We would recommend that as a minimum a local authority has established criteria for identifying non-designated heritage assets, and ideally has a local list of assets linked to planning policies in their Local Plan. A good example is Peterborough:

[http://www2.peterborough.gov.uk/environment/listed\\_buildings/locally\\_listed\\_buildings.aspx](http://www2.peterborough.gov.uk/environment/listed_buildings/locally_listed_buildings.aspx)

There are enough appeal cases to indicate that inspectors regard non-designated heritage assets, and something on a local list, as an important material consideration in planning decisions. In fact, where there isn't a local list, some inspectors have been unable to give as much weight to a non-designated heritage asset. Our website contains a number of appeal cases and if you search for 'locally listed heritage asset' or 'non-designated heritage asset', you will get relevant ones: <http://www.historicengland.org.uk/advice/hpg/planning-cases/> Robust provision for these heritage assets will increase the soundness of your forthcoming plan.

### **Policy HE1: Archaeology and Scheduled Monuments**

We welcome a policy on archaeology and scheduled monuments. We recommend that the final paragraph is reviewed. As it covers substantial harm to designated and non-designated heritage assets, it should be noted that the thresholds in paragraph 133 and paragraph 135 of the Framework are different. However, if you are intending to apply this paragraph to non-designated archaeology of equivalent significance to scheduled monuments only (paragraph 139), this should be made clear. The policy also omits a key element of the test in paragraph 133 – that the harm or loss is necessary. It is not enough for substantial public benefits to outweigh the substantial harm, the harm itself needs to be necessary to achieve the public benefits. The paragraph should be amended to remain consistent with the Framework.

### **18.3 Historic Landscapes and Development**

We welcome a section on historic landscapes. Not all historic landscapes are designated as registered parks and gardens and we are pleased to see reference to this in the supporting text. Non-designated historic landscapes are non-designated heritage assets and, as such, can be included in a local list of such heritage assets. We would welcome a list of non-designated historic landscapes in the Plan or in a local list which is then embedded through the relevant policies. Such a list can provide clarity for users of the Plan.

### **Policy HE2: Historic Parks and Gardens**

We welcome the reference to non-designated historic parks and gardens in the policy. Whilst the evidence required from applicants should be proportionate, the



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requirement for a Historic Parks and Gardens Heritage Statement only related to designated and not non-designated parks and gardens. This should be amended to ensure that a proportionate statement is provided. This is important given the level of growth and locations of growth proposed in this Plan. The final sentence of the policy on harm does not meet the tests set out in the Framework and should be reviewed.

We also note a typographical error in the final paragraph whereby '*Development proposals*' is not preceded by a space.

#### **18.4 Built Heritage**

We note that following our previous comments that the '*Archaeology*' section has been renamed '*Archaeology and Scheduled Monuments*', given scheduled monuments can also be above ground structures and constitute built heritage. However, as this section remains as '*Built Heritage*' this still might lead to confusion. For greater clarity, either the section should be entitled '*Listed Buildings and Conservation Areas*' or the supporting text should clarify how upstanding scheduled monuments relate to the Built Heritage section.

#### **18.5 Listed Buildings**

We note a typographical error in paragraph 18.5.1, "...*repair, renovation, alteration and extension of should not...*" Paragraph 18.5.2 does not make sense as it begins in the middle of a sentence. Given the paragraph is discussing loss and demolition, it is important to be clear and not leave room for interpretation or confusion.

#### **Policy HE3: Built Heritage**

Again, clarity should be given in the policy as to whether this applies to non-designated upstanding structures which are non-designated heritage assets. We also recommend that the fourth bullet point does not finish mid-word. There is an opportunity in this policy to make reference to historic shopfronts, as set out in our previous advice.

The policy should make specific reference to the need to consider the impact upon the special architectural or historic interest of listed buildings, the policy at present focuses more on the statutory obligations set by the Planning (Conservation and Listed Buildings) Act 1990 as it relates to conservation areas, and does not equally consider the separate considerations for listed buildings.

### **19: Development in the Countryside**

#### **Policy DC3: Rural Workers Dwellings.**

We welcome the clarification to the policy following on from our previous comments.



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## **Policy DC4: Rural Workers Dwellings**

We request that this policy is amended to require development to have regard to the historic environment and its setting.

## **Policy DC5: Equestrian Development**

We request that this policy is amended to require development to have regard to the historic environment and its setting. The need for equestrian development to be considered in the context of Landscape Character Assessment is welcomed.

### **Appendix 1: List of acronyms and technical terms**

We note a typographical error in the listed building description with a reference to 'cartilage'. Missing from the list are these terms:

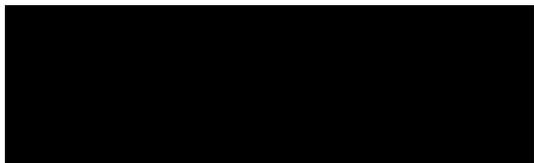
- Heritage asset
- Non-designated heritage asset
- Registered Park and Garden
- Scheduled Monument

## **Conclusion**

Please note that absence of a comment on a policy, allocation or document in this letter does not mean that Historic England is content that the policy, allocation or document is devoid of historic environment issues.

Finally, we should like to stress that this opinion is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise where we consider that these would have an adverse effect upon the historic environment.

Yours sincerely



**Dr Natalie Gates**

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