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Dear Ms Cowie

**Bedford Local Plan 2040 Draft Plan Strategy Options and Draft Policies  
Consultation June 2021**

Thank you for consulting Historic England on the Draft Plan Strategy Options and Draft Policies Consultation for Bedford Local Plan. As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully considered at all stages and levels of the local planning process.

We have reviewed the Draft Plan and consultation material. As a general comment, Historic England welcomes emerging plan and work undertaken to date.

**Site Assessment**

We are pleased to note that a considerable degree of site assessment has already been undertaken in relation to the historic environment. These are set out in the Site Assessment pro-formas as well as the historic environment Excel spreadsheet. We welcome the additional table. This helps to ensure the process is both robust and transparent.

To date, the assessment of sites is fairly high level and brief but provides a useful starting point, in particular helping to identify immediate showstoppers. We note that many of the sites are shown as amber and the table notes that further assessment in terms of significance, impact on that significance, potential mitigation and enhancements etc will be needed.





As we have discussed previously, further assessment will be needed of the sites. This further assessment, known as **Heritage Impact Assessment** (HIA) should follow the 5 step methodology set out in our advice note, HEAN 3 on Site Allocations in Local Plans <https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>.

HIAs should be proportionate (both to the scale of the site and the assets affected). All potential sites will need to be appraised against potential historic environment impacts. It is imperative to have this robust evidence base in place to ensure the soundness of the Plan. We recommend that the appraisal approach should avoid merely limiting assessment of impact on a heritage asset to its distance from, or inter-visibility with, a potential site.

Site allocations which include a heritage asset (for example a site within a Conservation Area) may offer opportunities for enhancement and tackling heritage at risk, while conversely, an allocation at a considerable distance away from a heritage asset may cause harm to its significance, rendering the site unsuitable.

Impacts on significance are not just based on distance or visual impacts, and assessment requires a careful judgment based on site visits and the available evidence base. Cumulative effects of site options on the historic environment should be considered too.

The following broad steps might be of assistance in terms of assessing sites:

- Identify the heritage assets on or within the vicinity of the potential site allocation at an appropriate scale
- Assess the contribution of the site to the significance of heritage assets on or within its vicinity
- Identify the potential impacts of development upon the significance of heritage asset
- Consider how any harm might be removed or reduced, including reasonable alternatives sites
- Consider how any enhancements could be achieved and maximised
- Consider and set out the public benefits where harm cannot be removed or reduced

The HIAs should assess the suitability of each area for development and the impact on the historic environment. Should the HIA conclude that development in the area could be acceptable and the site be allocated, the findings of the HIA should inform the Local Plan policy including development criteria and a strategy diagram which expresses the development criteria in diagrammatic form.





## **Alternative Growth Options**

There are four emerging preferred options 2a – 2d.

These options include different combinations of the following:

- a) Further regeneration within the Bedford / Kempston urban area, particularly of any available brownfield sites
- b) Expansion of the Bedford / Kempston urban area;
- c) Rail based parishes Kempston Hardwick, Stewartby, Wixams
- d) Southern parishes – Cotton End, Elstow, Kempston Rural, Shortstown, Wilstead and Wootton
- e) East parishes Cardington, Cople, Great Barford, Little Barford, Roxton, Willington and Wyboston
- f) Wyboston New Settlement
- g) Little Barford New Settlement

We have analysed each of these potential areas for growth in terms of their potential to impact upon the historic environment. These aspects are outlined below. We have focussed our attention on designated heritage assets.

For the avoidance of doubt, we have not considered archaeological issues in this brief, desk-based assessment but would refer you to the HER who should be able to advise in this regard. We have also not identified non-designated assets.

It should be noted that there are areas of archaeological interest beyond scheduled monuments and historic landscape issues beyond registered historic parks & gardens. Wider archaeological and landscape/townscape impacts are important considerations and need to be factored into site assessment. The possible cumulative impact of a number of site allocations in one location could also cause considerable harm to the historic landscape/townscape.

All sites should be scoped for archaeological potential before taking them forward to the next stage, as there is a high likelihood of archaeological sites not on the HER. Archaeological assessment and evaluation should be in line with the NPPF and best practice guidance so that impacts can be assessed at the earliest opportunity.

### **a) Further regeneration within the Bedford / Kempston urban area, particularly of any available brownfield sites;**

Regeneration and densification can be useful in accommodating the required growth. However, where there are opportunities for densification, this must be managed





carefully in a way that seeks to conserve and enhance the historic environment. Much of the central area of Bedford is designated as a Conservation Area.

We refer you to our publication, '**Increasing residential density in historic environments**' which can be found [here](#). This study explores the factors that can contribute to successfully delivering developments which increase residential density in historic environments. It uses a combination of literature review and case studies to provide a series of recommendations to support decision making.

Whilst taller buildings may be appropriate in some areas, there is an on-going question of scale. It is important that densification, including tall buildings, respects and does not harm the historic environment. We recommend that you consider undertaking a tall buildings study to inform your strategy and include a policy for tall buildings in your Plan.

Finally, densification is particularly appropriate in the context of brownfield development. Whilst densification of some areas may be appropriate, it is important to protect and enhance open spaces within urban areas and villages as these open spaces can constitute an important aspect of the character of a place, may help protect the setting of heritage assets or even be a heritage asset in their own right. Open spaces can provide important green lungs and help in tackling climate change. And they may also serve as important recreation and leisure areas.

#### **b) Expansion of the Bedford / Kempston urban area;**

The NPPF (paragraph 73) states that the supply of large numbers of new home often can be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns. Criterion c of the paragraph states that they should 'set clear expectations for the quality of the development and how this can be maintained (such as by following Garden City Principles).

That said, Bedford has already experienced large scale urban extensions. The river and its floodplain represent a constraint both to the east and west of the town. There are also several historic villages and conservation areas around the existing built up area, which raises the issue of coalescence and the importance of maintaining the integrity, separation and identity of these communities. To that end, urban extensions will need to be carefully considered, taking the impact on the historic environment into account.

#### **c) Rail based parishes Kempston Hardwick, Stewartby, Wixams**





The principal designated heritage assets in these parishes include the scheduled monument - Kempston Moated site, Stewartby Conservation Area including the Sir Malcolm Stewart Trust Common Room and Homes, both listed at grade II and the Stewartby brickworks (kilns and chimneys) also listed at grade II.

This area has already experienced significant growth. Further growth will need to conserve and enhance these heritage assets.

**d) Southern parishes – Cotton End, Elstow, Kempston Rural, Shortstown, Wilstead and Wootton**

There is a wide variety of designated heritage assets within these southern parishes. We have listed these assets below:

- Cotton End includes a number of listed buildings including the grade II\* Manor house and several grade II listed buildings.
- Elstow – the parish of Elstow includes Elstow Conservation which contains the scheduled monument, Elstow Manor House, Moot Hall (scheduled and grade II\*), grade I listed parish church of St Mary and St Helena, grade I Hillersdon Mansion, grade II\* Bunyan's Mead. There are also a large number of grade II listed buildings both within the conservation area and to the south along Wilstead Road.
- Kempston Rural includes the grade I listed All Saints Church and Church Tower, Grade II\* Box End and a large number of grade II listed buildings scattered throughout the parish.
- Shortstown – There are 5 grade II listed buildings in the northern part of the parish and to the south of the parish, the Cardington Shed's are both listed at grade II\*.
- Wilstead – the church of All Saints is listed at grade II\* but the remaining listed buildings in the village are all listed at grade II.
- Wootton – The parish of Wootton includes the Wootton Conservation Area, grade I listed St Mary the Virgin church, grade II\* Wootton House and numerous grade II listed buildings, mostly focussed on the conservation area and village itself but also some isolated farmsteads.

Elstow, Kempston Rural and Wootton have most highly graded assets and are likely to be most sensitive to development in terms of impacts on the historic environment.

Development within all of the southern parishes has the potential to impact upon these designated heritage assets and their settings. Clearly without knowing exactly where development will be located it is hard to state whether this level of development will be acceptable. In considering sites, it will be important to give





consideration to impacts on the historic environment. This will necessitate the need for Heritage Impact Assessments of sites, both to judge the suitability of the site per se and also to identify any mitigation measures needed or opportunities for enhancing heritage assets.

**e) East parishes Cardington, Cople, Great Barford, Little Barford, Roxton, Willington and Wyboston**

Again there is a wide variety of designated heritage assets within these southern parishes. We have listed these assets below:

- Cardington - The Parish of Cardington includes Cardington Conservation Area. The conservation area includes the grade II Registered Park and Garden to Hoard's House, as well as numerous listed buildings including Howards House, listed at grade II\* with the remaining listed buildings both inside and outside of the conservation area being listed at grade II. There are also several scheduled monuments in the parish including the site of a deserted village, a settlement site north of Chapel End Farm as well as a Neolithic and Bronze Age mortuary.
- Cople - includes a number of listed buildings. The majority of these are grade II listed although the church of All Saints is listed at grade I. There are several scheduled monuments in the northern part of the parish, several of which are associated with a Neolithic and Bronze Age mortuary complex as well as several barrows.
- Great Barford - There are 3 Conservation Areas in Great Barford (Great Barford, Great Barford Hill and Green End). Barford Bridge is scheduled and listed at Grade I. The parish church of All Saints are listed at Grade II\* and there are numerous grade II listed buildings throughout the village.
- Little Barford - The parish includes the grade II\* Church of Saint Denys as well as three grade II listed buildings; Lower Farmhouse, a barn to the north of Lower Farmhouse and cottages 1-4.
- Roxton - The Parish of Roxton includes Roxton Conservation Area. There are also a number of listed buildings including the Congregational Chapel and Parish Church of Saint Mary Magdalen, both listed at grade II\* with the remaining listed buildings all grade II.
- Willington - The Dovecote and Stables at the former Manor house are both listed at grade I and scheduled. The Docks moated site is also scheduled. There are also a large number of grade II listed buildings throughout the village. Birchfield Farm is a scheduled moated site with associated fishponds and leats in the northern part of the parish.
- Wyboston – The parish of Wyboston includes a number of scattered grade II listed buildings and three scheduled monuments - Palaceyard Wood medieval





moated enclosure and associated enclosures, woodland bank and cultivation earthworks, Chawston Manor medieval moated site and associated fishpond and a Moated enclosure and associated building platforms at The Lane, Wyboston.

These eastern parishes have a particular concentration and clustering of scheduled monuments along the Ouse river valley. There are also a number of Conservation areas along this valley too.

Development within these parishes and along this river corridor has the potential to impact upon these designated heritage assets and their settings. There are particular settings issues associated with the scheduled monuments along this sensitive river corridor.

Clearly without knowing exactly where development will be located it is hard to state whether this level of development will be acceptable. In considering sites, it will be important to give consideration to impacts on the historic environment. Heritage Impact Assessments will be required for sites, both to judge the suitability of the site per se and also to identify any mitigation measures needed or opportunities for enhancing heritage assets.

#### **f) Wyboston New Settlement (Denybrook Garden Village) ID977**

##### On-site Designated Heritage assets

There are a number of designated heritage assets within the site boundary include the grade II listed Dairy Farmhouse, Chestnuts Farmhouse, Eaton Tithe Farmhouse, Sudbury Farmhouse, Moat Cottage. There is also a scheduled monument (Moated Enclosure and associated building platforms, The Lane, Wyboston) that appears to lie just within the site boundary.

##### Nearby Designated Heritage Assets

There are a number of nearby heritage assets nearby including several grade II listed buildings in Chawston, Colesden, Channels End and Colmworth. To the north west of the site there are several scheduled monuments nearby the moated site know as 'The Camps' and associated fishponds as well as Bushmead's Priory (include the grade I listed Priory and several other listed buildings). To the south of the site lies another scheduled monument, Chawston Manor medieval moated site and associated fishpond.

Chawston Manor forms one of a pair of moated sites in the vicinity of Wyboston. This proximity will allow chronological and social comparisons between the two sites. Documentary evidence concerning the history of Chawston Manor moated site





further enhances its importance. The silts within the ditches and the water-logged deposits in the fishpond will contain environmental and artefactual evidence related to the occupation of the site; and, despite some disturbance caused by later constructions, the island will retain the buried remains of earlier buildings. The major part of the western enclosure is undisturbed and will also retain buried archaeological features.

Development of a new settlement has the potential to impact upon these designated assets and their settings as well as non-designated heritage assets. We strongly advise that a heritage impact assessment is undertaken of this site to better understand the potential impacts of development on these heritage assets.

We understand that the developers have provided an HIA. We would be interested to see this assessment and will need to ensure that the scope is sufficient. It will need to take into account heritage assets in the wider area including Bushmead Priory etc.

We note that this site is currently rated amber in your historic environment comments.

**g) Little Barford New Settlement (Top Farm, land east and west of Barford Road, Little Barford) ID907**

**On-site Designated Heritage assets**

Assuming we have identified the correct site ID for this proposed new settlement, the site includes the grade II\* Church of Saint Denys as well as three grade II listed buildings – Lower Farmhouse, a barn to the north of Lower Farmhouse and cottages 1-4.

**Nearby Designated Heritage Assets**

There are a number of grade II listed buildings to the east of the site along the A1 and the St Neots Conservation area and associated listed buildings lies to the north of the site. Tempsford Langford End Conservation Area and associated listed buildings lies to the South of the site and to the south west lies Roxton Conservation Area and associated listed buildings. To the east lie two isolated listed buildings, Lansbury Farmhouse and Hardwicke Farmhouse, both listed at grade II and further to the east lies Abbotsley Conservation Area including the grade II\* listed church and a number of other listed buildings

Development of a new settlement has the potential to impact upon these designated assets and their settings as well as non-designated heritage assets. The presence of the grade II\* listed church will require particular attention. We strongly advise that a







heritage impact assessment is undertaken of this site to better understand the potential impacts of development on these heritage assets.

We note that your historic environment RAG assessments are red for this site. We too have concerns, given the highly graded asset within the site boundary and also in the absence of any HIA to date.

## **h) Comments on the other new settlement options considered in Development Strategy Topic Paper**

### **i) Twinwoods**

Twinwoods wraps around to the north, south and east of the village of Milton Ernest. It incorporates or is immediately adjacent to three scheduled monuments and potentially affects the setting of two grade I and some grade II listed buildings. Two of the scheduled monuments relate to the shrunken medieval village, the other a set of enclosures. The grade I listed buildings are Milton Ernest Hall which is William Butterfield's only complete country house and the parish church of All Saints.

We appreciate this is not currently one of the preferred options being considered. There are clearly some highly grade heritage assets in the surrounding area. The impact on these assets would require careful examination through Heritage Impact Assessment, were this option to be reconsidered as a possibility in the future.

### **ii) Colworth**

Lee Farm / Colworth has been identified as a potential new settlement site. There are a number of designated assets within the site including the grade II\* listed Colworth House, and New Farmhouse and Antonie Farmhouse, both listed at grade II. There are also numerous heritage assets located around the site. The site lies adjacent to and includes a small part of the Sharnbrook Conservation Area. The Conservation Area includes the grade I listed Church of St Peter, together with approximately 40 buildings or structures listed at grade II.

A further cluster of listed buildings, including All Saints Church and a further 11 buildings listed at grade II lie to the north west of the site within the village of Souldrop. Hinwick Lodge and Barn, both listed at grade II, lie to the north of the site whilst to the north west Hinwick House is listed at grade I and Hinwick Hall and the garden entrance gates both at grade II\*. In addition, there are a further 25 buildings listed at grade II in the vicinity and Hinwick House Registered Park and Garden is listed at grade II.





The Podington Conservation area contains a further 24 listed buildings including the grade I listed church of St Mary and to the south west, Odell Conservation Area contains approximately 20 listed buildings including the grade I listed All Saints Church. Hobbs Green Farmhouse (grade II) lies outside of the conservation area but closer to the site allocation. In addition, there is a scheduled monument, a moated site in Castle Close, just to the south east of the site as well as Wold Farm Moated Enclosure, a scheduled monument, to the west of the site.

The HER indicates that this is an area of very high archaeological potential with a high concentration of records in this area dating from the late prehistoric through to twentieth century features. These include late pre-historic enclosure, iron age cropmarks, iron age ditches, rectangular enclosure, iron age pottery, a Roman road, a Roman site, Tofte Manor, medieval bloomeries (iron works) and a World War II searching battery.

Given this rich concentration of heritage assets, any development at Colworth therefore has the potential to impact upon these assets or their settings.

Again, we appreciate this is not currently one of the preferred options being considered. There are clearly some highly grade heritage assets in the surrounding area. The impact on these assets would require careful examination through Heritage Impact Assessment, were this option to be reconsidered as a possibility in the future.

### **Summary and comparison of options 2a-2d.**

As has been highlighted above, each of the different potential areas for growth contain a range of heritage assets and there is potential for development in these areas to impact on those assets and, in particular, their settings. Much will depend on the precise location and quantum of development, as well as the ultimate design.

In considering options for growth, further assessment will be needed of the various impacts on the historic environment. To that end, the site assessment undertaken to date will also need to be combined with further, more detailed, **heritage impact assessment**, as outlined in the section above on-site assessment, to determine the suitability or otherwise both of individual sites and broader growth options.

Having reviewed the **Sustainability Appraisal**, we note that the assessment records uncertain effects for the historic environment for all the different growth options. Whilst this is in part understandable, given precise locations for development are still to be determined, there has been little or no assessment of the relative merits of the broad spatial options in terms of the historic environment in the assessment. We





suggest that a **narrative comparing the different options** and their likely impacts on the historic environment be prepared.

So to conclude, within the southern parishes we have identified several parishes as being perhaps more sensitive to development (particularly Elstow but also Wootton and Kempston Rural); in the eastern parishes there are sensitivity issues around the settings of a cluster of scheduled monuments as well as a number of Conservation Areas.

And of the two preferred new settlement options, it would seem that whilst Little Barford is perhaps slightly more sensitive to development than Wyboston in terms of impacts on the listed buildings (having a grade II\* church within the site), the scheduled monuments close to Wyboston give rise to different settings issues and sensitivities that will need careful consideration and assessment.

### **Policy Wording for sites**

If, having completed the heritage impact assessments, it is concluded that a site is suitable for allocation, we would remind you to include appropriate policy criteria for the historic environment in the policy.

Rather than repeating our previous advice, please refer to the advice we gave you on policy wording in our Issues and Options response last year.

It can also be helpful to refer to an HIA in the policy wording. Concept diagrams can also be useful to include in the plan to illustrate key site considerations/recommendations.

## **7.0 Development Management Policies**

### **Bedford Borough Design Guide (page 48)**

We welcome the preparation of a Design Guide. It would be helpful to mention the historic environment in paragraph 7.28. It would be helpful to have a specific policy in the Plan for the Design Guide to sit under.

We have been consulted on the SEA for the Design Guide and look forward to commenting on the Design Guide itself as it emerges.





## **Tall Buildings Study and Policy**

Given the growth pressures that will be experienced by Bedford over the coming years, we strongly recommend that the matter of Tall buildings and the skyline needs to be addressed in a new DM policy. We recommend that you commission a tall buildings study. See our advice note HEAN 4 and the consultation draft of HEAN 4. Any policy should indicate what considerations are needed for taller buildings, where buildings may or may not be appropriate etc. and in particular consider in the impact on the historic environment. We would be happy to advise further regarding the detail of such a study.

## **Supporting Evidence**

### **Landscape Character Assessment/Historic Landscape Characterisation**

We welcome the section on Historic Landscape Character within the LCA (paras 2.15 – 2.84) which provides helpful context. However, we continue to request that the finer grained historic landscape characterisation is updated to better inform future development and growth options.

### **Historic England – OX Cam research work**

Historic England has commissioned consultants to undertake some work looking at development in the OxCam Arc. 'Measuring Impact: Managing Change' looks at the question, 'How should the form of growth in the Oxford-Cambridge arc positively respond to the Historic Environment'. This research is due to report later this year and we hope to be able to share this with you at this time as it may provide useful evidence to inform your Local Plan work.

## **Other comments**

A number of other, minor comments on the plan are included in the attached table Appendix A.

In preparation of the forthcoming Bedford Local Plan, we encourage you to draw on the knowledge of local conservation officers, archaeologists and local heritage groups.

Please note that absence of a comment on an allocation or document in this letter does not mean that Historic England is content that the allocation or document forms part of a positive strategy for the conservation and enjoyment of the historic environment or is devoid of historic environment issues. Where there are various






options proposed for a settlement, identification of heritage issues for a particular allocation does not automatically correspond to the support for inclusion of the alternative sites, given we have not been able to assess all of the sites.

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.

We trust that these comments are helpful to you in developing the Local Plan. Should you have any queries, please do not hesitate to contact us.

We suggest it might be helpful to set up a meeting to discuss our comments and, in particular, heritage impact assessments and policy wording for site allocations. Please feel free to suggest some dates.

Yours sincerely

  
Historic Environment Planning Adviser



