



Allocation Site: 342
Land at Home Road/Gibraltar Corner
Kempston, Bedfordshire

Heritage Appraisal



Report prepared for:
Bedford Borough Council

CA Project: MK0614

CA Report: MK0614_342

March 2022



Allocation Site: 342 Land at Home Road/Gibraltar Corner Kempston, Bedfordshire

Heritage Appraisal

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prepared by	Sophie Bell, Heritage Consultant
date	March 2022
checked by	Clive Meaton, Heritage Consultant
date	March 2022
approved by	Duncan Coe, Principal Heritage Consultant
signed	
date	March 2022
issue	2

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<p>Cirencester Building 11 Kemble Enterprise Park Cirencester Gloucestershire GL7 6BQ</p> <p>t. 01285 771022 f. 01285 771033</p>	<p>Milton Keynes Unit 8 – The IO Centre Fingle Drive Stonebridge Milton Keynes Buckinghamshire MK13 0AT</p> <p>t. 01908 564660</p>	<p>Andover Stanley House Walworth Road Andover Hampshire SP10 5LH</p> <p>t. 01264 347630</p>	<p>Suffolk Unit 5, Plot 11 Maitland Road Lion Barn Industrial Estate Needham Market Suffolk IP6 8NZ</p> <p>t. 01449 900120</p>
e. enquiries@cotswoldarchaeology.co.uk			

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1. INTRODUCTION

- 1.1. In December 2021, Cotswold Archaeology was commissioned by Bedford Borough Council to undertake a Heritage Appraisal in respect of land at Home Road, Gibraltar Corner in Kempston, Bedfordshire (hereafter referred to as ‘the Site’). The Site comprises an irregular hexagon currently under arable cultivation, measuring c. 7ha (NGR: TL 01059 47163; Fig. 1). The Site is located within the northern fringes of the hamlet of Gibraltar and c. 200m west of the town of Kempston. It is bounded to the south by Ibbett Close, to the north by Green End Road and Kempston Nurseries and to the west by Home Road, and the A6 is located 180m to the east of the Site.
- 1.2. This appraisal has been commissioned to provide information with regard to potential heritage and archaeology constraints to allocation of this land for development.

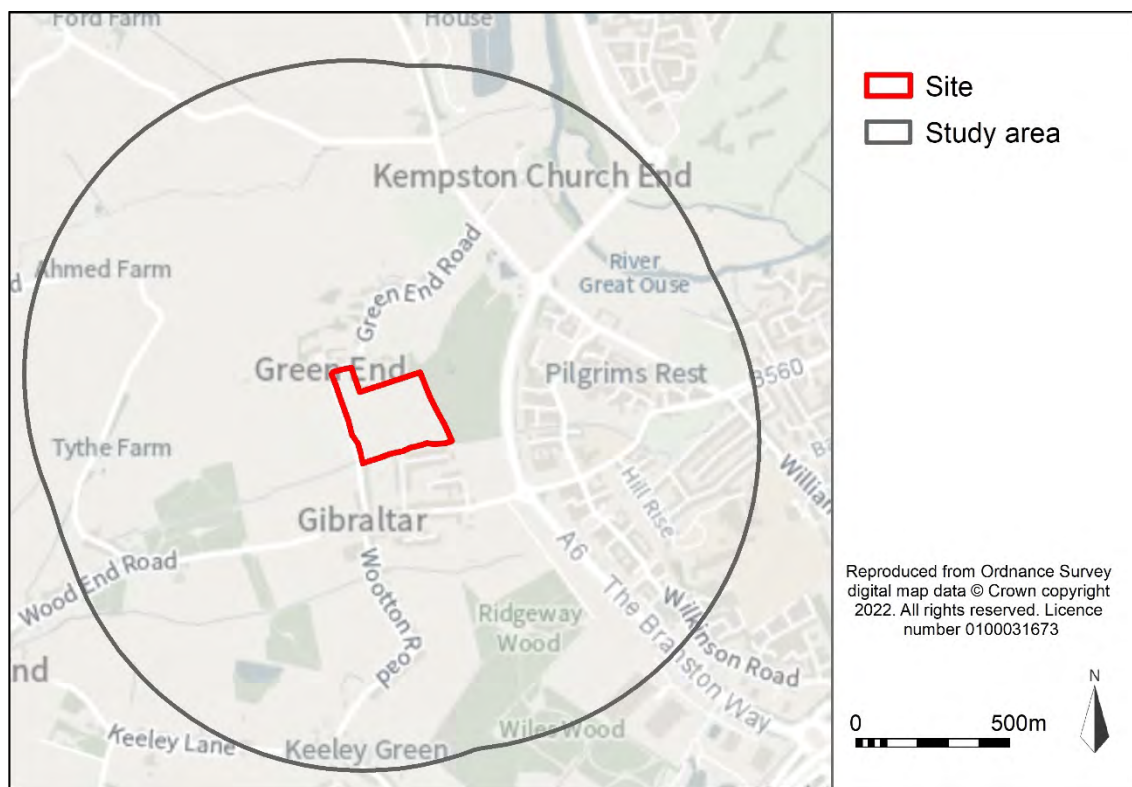


Fig. 1 Site location

Aims

- 1.3. The primary aim of this appraisal is to identify any potential archaeological and heritage constraints which may need to be taken into consideration as part of the decision to allocate this Site for future redevelopment. This appraisal focusses upon the heritage resource within the Site itself, although the resource within the wider landscape is

considered where appropriate (within a 1km study area) to more fully understand the archaeological potential and possible constraints within the Site.

1.4. Designated heritage assets within the environs of the Site were also considered to the extent to which their significance may be affected by development within their settings.

1.5. The objectives of the appraisal are:

- To summarise recorded heritage assets within the Site and in its environs;
- To summarise the potential significance of known or potential buried archaeological remains within the Site boundary;
- To summarise potential built heritage assets within the Site; and
- To identify any designated heritage assets that may be considered as sensitive receptors to development within the Site, including Conservation Areas and nearby Listed Buildings.

Methodology

1.6. The main repositories of information consulted in the preparation of this appraisal comprised:

- Historic England's National Heritage List (NHLE) for information about designated heritage assets, including Listed Buildings and Scheduled Monuments;
- Bedford Historic Environment Record for known heritage assets and previous archaeological works;
- Previous archaeological reports and assessments;
- Other online sources, including British Geological Survey (BGS) Geology of Britain Viewer, aerial imagery and historic mapping; and
- A site visit, which took place in January 2022 to undertake an appraisal of the buildings within the Site and designated heritage assets in the vicinity.

1.7. Known and potential heritage assets within the Site and its surroundings (based on a 1km study area) are discussed in Section 2 (for archaeological remains) and Section 3 (for built heritage assets within the Site and in its environs). Heritage assets are referred to in the text by a unique reference number (**1**, **2**, etc.) keyed to the figures. A gazetteer of all assets has been compiled and is presented as Appendix 2. A bibliography of sources consulted has been included in the References section of this appraisal.

Limitations

- 1.8. This appraisal is a desk-based study and has utilised information derived from a variety of online sources, and informed by a site visit. While the level of detail included within the appraisal provides an overview of the heritage resource and constraints within the Site, any planning applications would need to be accompanied by a full desk-based heritage assessment, in line with the relevant guidance (ClfA 2020).
- 1.9. A walkover survey was conducted within the Site, which was undertaken in dry and but cloudy weather conditions. Access was afforded within the Site, although such observations are limited since archaeological remains can survive below-ground with no visible surface indications of their presence. It is possible that unknown archaeological remains may be present within the Site, and the presence of modern infrastructure may possibly have inhibited identification of any possible upstanding remains. There was also sufficient access to heritage assets to assess likely impacts upon the significance of the assets due to changes to their setting.
- 1.10. The 'settings assessment' presented in Section 3 of this report was carried out in accordance with Historic England's Good Practice Advice Note 3: The Setting of Heritage Assets (2017). Steps 1 and 2 of the assessment process (the identification of assets and the understanding of their significance) were undertaken without constraint (except where specific limitations are referenced i.e., where close access is not possible). Where the potential development options are known or at least the broad parameters are available, a specific narrative has been provided on the potential impacts and opportunities to mitigate these impacts (steps 3 and 4 of the assessment). However, where the potential development proposals are not known, more general statements are offered in regard to impacts and mitigation opportunities. In any case, (as discussed in the concluding remarks of this report) further assessment of these matters would be required to support any planning applications at the Site.

2. SUMMARY OF ARCHAEOLOGICAL RESOURCE

Landscape context

- 2.1. The Site comprises an irregular hexagon currently under arable cultivation, measuring c. 7ha (NGR: TL 01059 47163; Fig. 1). The Site is located within the northern fringes of the hamlet of Gibraltar and c. 200m west of the town of Kempston. It is bounded to the south by Ibbett Close, to the north by Green End Road and Kempston Nurseries and to the west by Home Road, and the A6 is located 180m to the east of the Site. The Site is on a gentle south-facing slope, measuring c. 42m above Ordnance Datum (aOD) in the north and 37m aOD in the south. The River Great Ouse is located 680m north-east of the Site.
- 2.2. The British Geological Survey (BGS Online 2022) record the underlying bedrock geology of the Site as Peterborough Member (Mudstone), a sedimentary bedrock formed approximately 164-166 million years ago in the Jurassic Period, when the local environment was dominated by shallow seas. The Site is located on gravel terraces (Fig. 2) and the majority of the Site has superficial deposits of Head 1 (Clay, Silt Sand and Gravel) and Head 2 (Gravel, Sand, Silt and Clay) formed up to 3 million years ago in the Quaternary Period when the local environment was dominated by subaerial slopes. However, deposits of Alluvium (Clay and Silt) are recorded in the south-east of the Site, formed up to 2 million years ago in the Quaternary Period when the local environment was dominated by rivers. No borehole data is available for the Site.

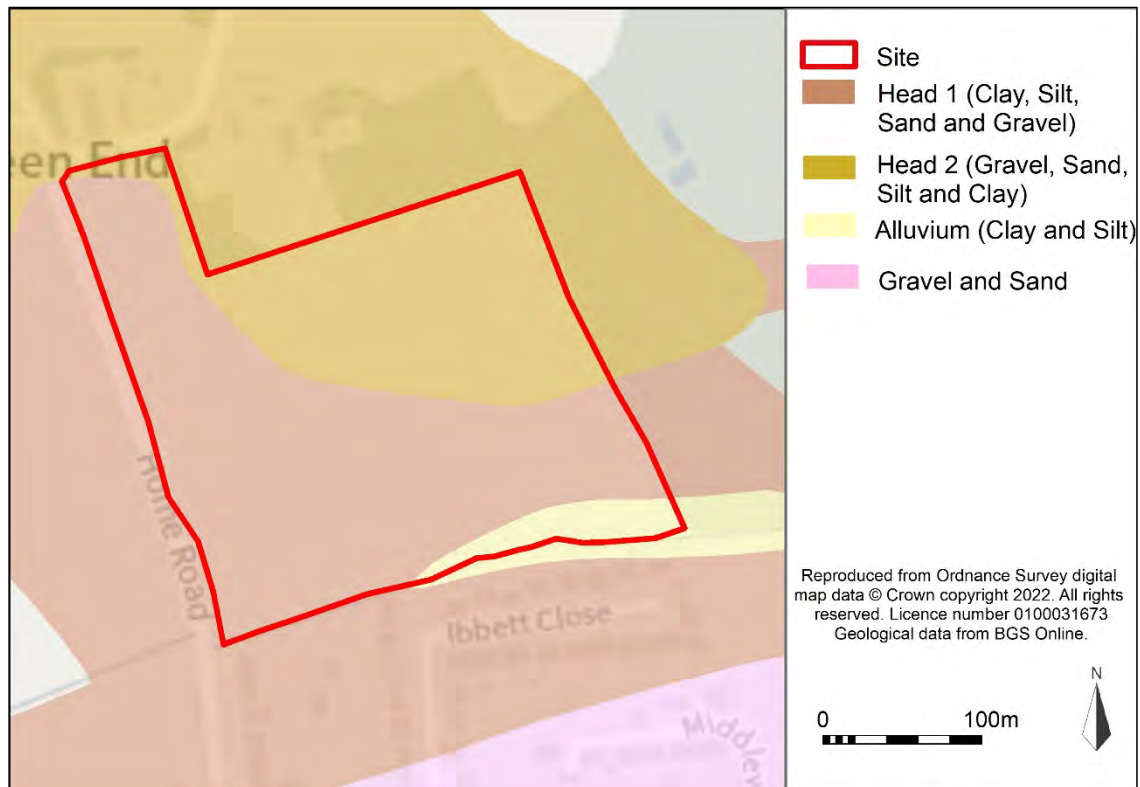
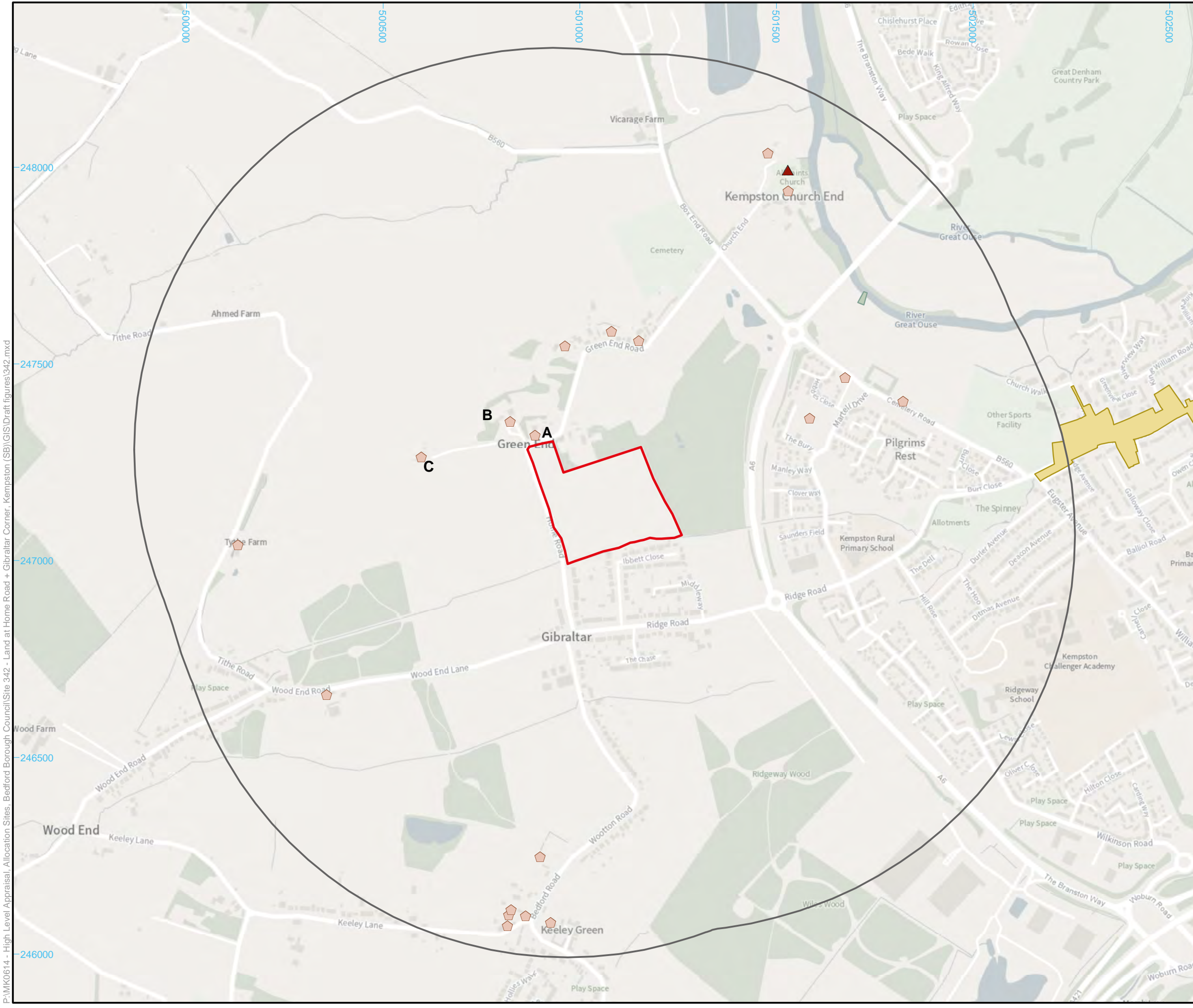


Fig. 2 Superficial geology

Designated heritage assets

- 2.1. No World Heritage Sites, Historic Wrecks or Historic Battlefields are located within the Site or the study area. 'Paved Ford 400yds SE of Kempston Church' (Fig. 3, List Entry Number: 1005412) is the only Scheduled Monument within the study area and is located 660m north-east of the Site. The Site is not located within a Conservation Area, however Kempston Conservation Area is located within the study area 920m east of the Site at its closest point (Fig. 3).
- 2.2. There are twenty Listed Buildings located within the study area. These include the Grade I Listed All Saints Church 790m north-east of the Site (Fig. 3, List Entry Number 1114281) and nineteen Grade II Listed Buildings. The closest buildings to the Site include 'The Cottage, Kempston House' located 25m north of the Site (Fig. 3: **A**), 'Kempston House located 75m north of the Site (Fig. 3: **B**), and Ramsey Cottage located 270m north-west of the Site (Fig. 3: **C**).
- 2.3. Potential non-physical impacts on these assets will be discussed in more detail in Section 3 of this report. Designated heritage assets will not be discussed further in Section 2, unless relevant to the archaeological baseline of the Site.



- Site
- Study area
- ▲ Grade I Listed Building
- ◡ Grade II Listed Building
- Scheduled Monuments
- Kempston Conservation Area



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	Andover	01264 347630
	Cloucester	01285 771022
	Milton Keynes	01908 564660
	Suffolk	01449 900120
www.cotswoldarchaeology.co.uk		
enquiries@cotswoldarchaeology.co.uk		

PROJECT TITLE
Site 342 - Gibraltar Corner

FIGURE TITLE
Designated Heritage Assets

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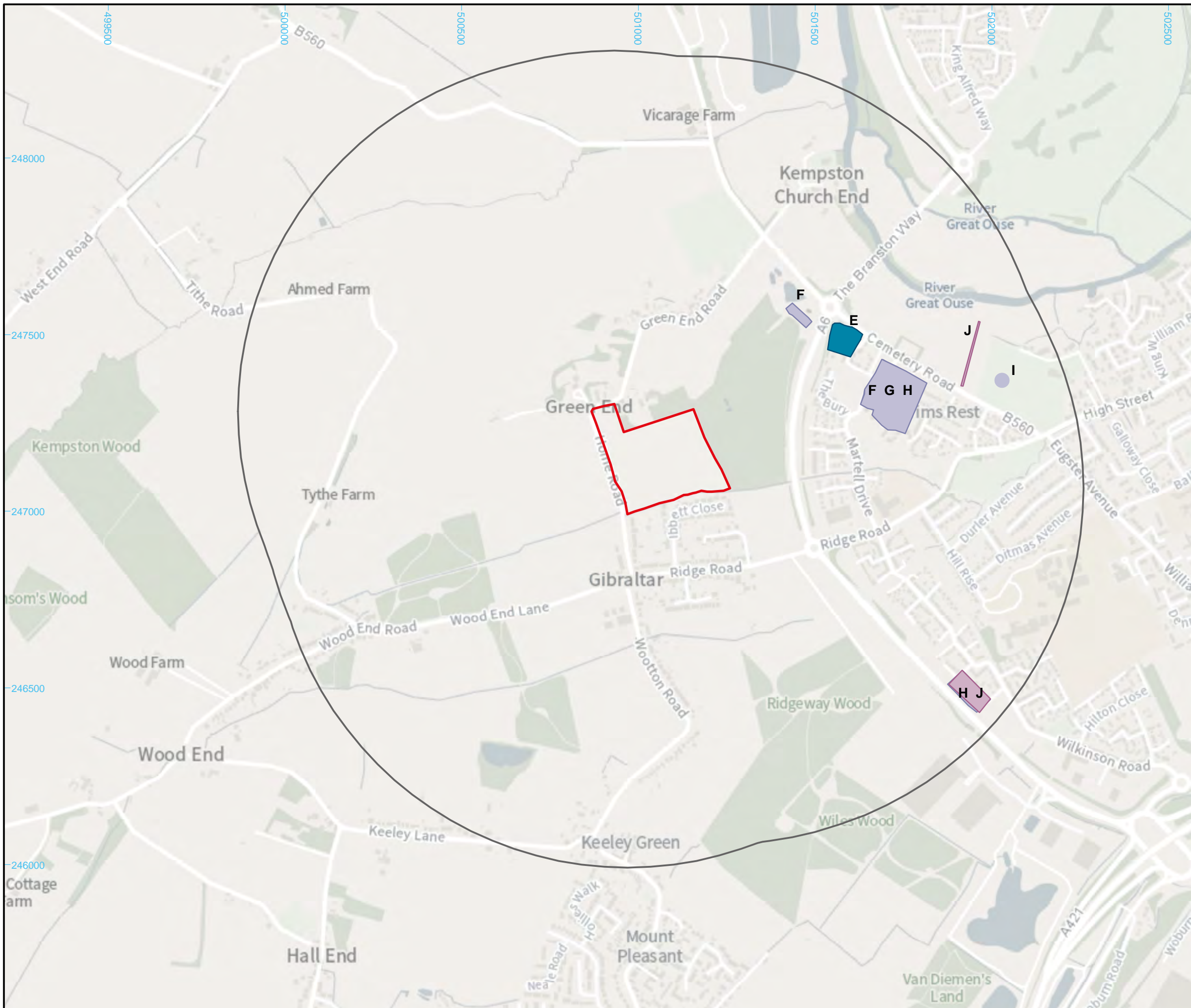
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Prehistoric (Palaeolithic to Middle Iron Age)

- 2.4. A pit of possible prehistoric date was identified during an excavation 180m north-east of the Site in 2016 (Fig. 5: T, Oxford Archaeology 2017). Two pits of Neolithic date were also identified during an evaluation and excavation associated with the Biddenham Loop development 415m north-east of the Site (Fig. 4: E).
- 2.5. The Biddenham Loop development investigations also identified an Early Bronze Age ring ditch 390m north of the Site and pit 490m east of the Site (Fig. 4: F) and two Middle Bronze Age pits 400m east of the Site (Fig. 4: G),
- 2.6. Features dating to the Late Bronze Age or Early Iron Age were also identified during works at the Biddenham Loop. These include pits containing loom weights and hearth waste suggestive of nearby settlement activity 400m east of the Site, and a possible fenceline 820m south-east east of the Site (Fig. 4: H). Three Bronze Age ring ditches were also identified during separate investigations at Cutler Hammer Sportsground, 835m east of the Site (Fig. 4: I).
- 2.7. During the Biddenham Loop investigations Middle Iron Age features identified included a farmstead 700m east of the Site and pits and postholes 835m south-east of the Site (Fig. 4: J).

Late Iron Age and Roman

- 2.8. The Rural Settlements of Roman Britain project record two Roman Roads in the vicinity of the Site. These include one on a south-west to north-east alignment 320m south-west of the Site and another which is projected to follow the route of the modern Cemetery Road 475m to the north-east of the Site (Rural Settlement of Roman Britain 2022, Fig. 5: K and L). A small keyhole excavation at Keeley Corner, 600m south of the Site identified evidence of settlement comprising a ditch, pits, and a large quantity of pottery dating to 50-100 AD (Pollard 1999, Fig. 5: M). An archaeological investigation 570m north of the Site also identified evidence of Roman activity comprising a nucleated roadside settlement, burials, and possible shrine in use from the late 1st century until the end of the 4th century (Albion Archaeology). A pit containing burnt stone, animal bone and Late Iron Age and early Roman pottery was also identified 555m north-west of the Site (Fig. 5: N).



- Site
- Study Area
- Neolithic
- Bronze Age
- Iron Age



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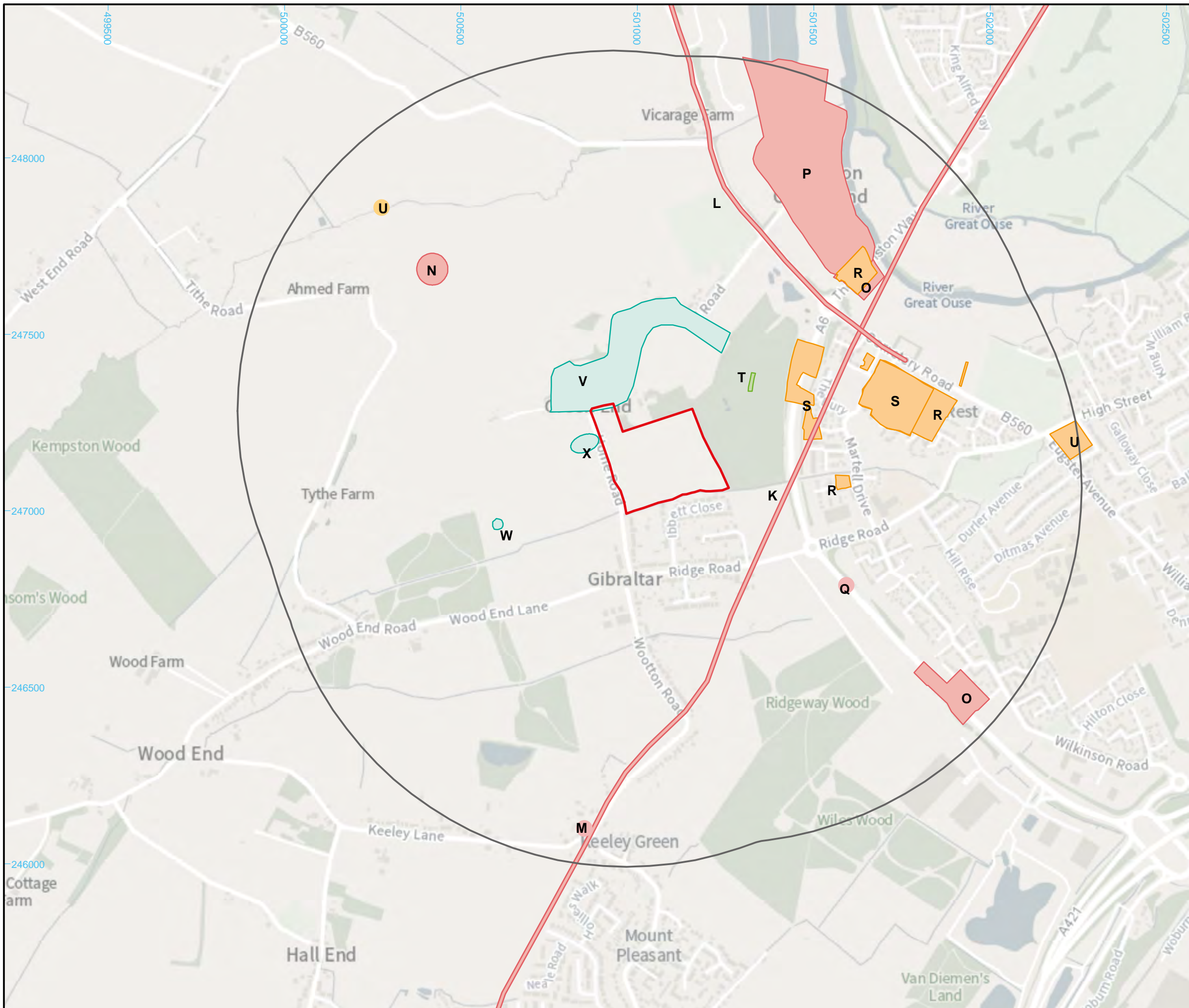


 Andover 01264 347630
 Cirencester 01285 771022
 Milton Keynes 01908 564660
 Suffolk 01449 900120
 www.cotswoldarchaeology.co.uk
 enquiries@cotswoldarchaeology.co.uk

PROJECT TITLE
Site 1333 - Gibraltar Farm

FIGURE TITLE
**Selected recorded heritage assets:
 Palaeolithic to Middle Iron Age**

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- Site
- Study Area
- Late Iron Age/Roman
- Saxon
- Medieval
- Post-medieval



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Cotswold Archaeology

Andover	01264 347630
Cirencester	01285 771022
Milton Keynes	01908 564660
Suffolk	01449 900120

w www.cotswoldarchaeology.co.uk
e enquiries@cotswoldarchaeology.co.uk

PROJECT TITLE
Site 1333 - Gibraltar Farm

FIGURE TITLE
Selected heritage assets: Late Iron Age to Modern

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-
- 2.9. Investigations associated with the Biddenham Loop development identified evidence of nearby settlement 585m north-east of the Site comprising rectangular enclosures, a trackway, and high quantities of residual late Iron Age/early Roman pottery (Fig. 5: O). Eight gullies and several small pits of Late Iron Age to early Roman date were also identified 755m south-east of the Site (Fig. 5: O). A series of archaeological investigations 565m to 985m north east of the Site also identified evidence of Roman activity comprising a possible farmstead (Fig. 4: I), villa, roadside settlement, burials, cremations, ditches and other features dating from the late 1st century until the 7th century (Fig. 5: P), suggesting continued use of a Roman landscape into the early Anglo-Saxon period despite the collapse of Roman administration in the mid-5th century.
- 2.10. During the construction of Bedford Western Bypass ditches, gullies, pits and postholes were identified 435m south-east of the Site (Fig. 5: Q). Whilst none of these features produced any dating evidence, they predated the medieval furrows. Considering the prevalence of Iron Age and Roman features in the landscape, it is likely that these features also date to the Late Iron Age or Roman period.

Early medieval and medieval

- 2.11. During the Biddenham Loop investigations finds dating to the Early Saxon period included two small pits 325m east of the Site, three possible sunken feature buildings, dispersed pits and postholes representing buildings 400m east of the Site, a ditch 690m east of the Site, and two large isolated pits and an inhumation 590m north-east of the Site (Fig. 5: R). Later remains dating to the Late Saxon to Early Norman period were also identified 250m east of the Site and comprised enclosures, pits, buildings, postholes, and ovens representing settlement (Fig. 5: S). Anglo-Saxon cemeteries have been identified 835m north-west of the Site and 935m east of the Site (Fig. 5: U).
- 2.12. Though Gibraltar is a settlement of 20th century origin, the nearby settlements of Kempston and Wootton, whose historic cores are located 1.2km east and 1.2km south of the Site respectively, are both recorded in the Domesday Book. Kempston had a large recorded population of 38 households, land comprising ploughland, woodland and meadow, and a mill. Wootton had a population of 26 households, land comprising ploughland, meadow, and woodland.
- 2.13. An excavation took place 180m north-east of the Site in 2016 (Oxford Archaeology 2017, Fig. 4: T). The excavation identified a small group of truncated Late Saxon pits overlain by the remains of at least three medieval buildings. The earliest building was constructed

out of timber, but the other two structures had stone foundations. A detached kitchen containing three ovens produced a silver coin dating to 1278-1280 AD. The stone foundations and separate kitchen suggest that this was a relatively high-status settlement. The date of this is interesting as the manor of Kempston was divided into three manors in the second half of the 13th century, becoming the manors of Kempston Hastingsbury, Kempston Daubeney and Kempston Brucebury, following the death of John le Scot in 1237 and gifted to each of his three daughters. The initial timber structure suggests that there was a hurry to construct a building of some form on this site, and that this was perhaps never intended to be more than a marking of territory, considering its quick replacement. This, coupled with the finding of a 13th century coin suggest that this could be one of these three manors.

Post-medieval and modern

- 2.14. In the post-medieval period, the Site would have remained as agricultural land, though current buildings and documentary sources for Green End, immediately north of the Site, reflect a date range of 1661-1874, showing that occupation did take place nearby throughout this period (Fig. 5: **V**). Nearby Kempston did not grow significantly until the 19th century. The population of the town and rural land around the town including Green End was 1,035 in 1801, compared to 4,729 in 1901 and 19,375 in 2001 (Beds Archives 2022). A probable post-medieval circular stack is visible on historic aerial photographs in the field to the west of the Site but was not visible during the Site visit (Fig. 5: **W**). The 1804 Enclosure Map (not seen or reproduced, mapped by Bedford HER) shows a post-medieval village green immediately west of the Site (Fig. 5: **X**).
- 2.15. In the 19th and 20th centuries, cartographic sources are useful in charting the historic development of the Site. The 1883 Ordnance Survey Map (not reproduced) shows the east of the Site comprising one large field bounded on the south side by a drainage ditch. The Site does not change on the 1902, 1927, 1944 or 1950 Ordnance Survey Maps (not reproduced). However, the Site's vicinity changes with the construction of properties to form Gibraltar hamlet along Green Lane and Woodend Lane to the south of the Site. A field boundary is also installed along the northern boundary of the eastern Site. The Site has not undergone any significant changes since the 1950s. The Site currently comprises arable land (Photo 1).



Photo 1 Site, taken from Green Lane looking east

3. BUILT HERITAGE SUMMARY

- 3.1. This section considers potential non-physical effects upon the significance of susceptible heritage assets within the Site environs. Non-physical effects are those that derive from changes to the setting of heritage assets as a result of new development. All heritage assets included within the settings assessment are summarised in the gazetteer in Appendix 2, and shown on Figure 3.
- 3.2. Those assets identified as potentially susceptible to non-physical impact, and thus subject to more detailed assessment, are Grade II Listed 'The Cottage, Kempston House' located 25m north of the Site (Fig. 3: **A**), and 'Kempston House located 75m north of the Site (Fig. 3: **B**).
- 3.3. Prior to the Site walkover, Ramsey Cottage 270m north-west of the Site (Fig. 3: **A**), was also considered potentially susceptible to changes in its setting, but during the Site visit it was determined that intervening vegetation provided an effective screen and agricultural land between the asset and the Site would preserve its immediate setting (Photo 4). The agricultural character of the Site sits within a setting comprising a mixed tapestry of 21st century land-uses. The current arable land-use has no meaningful association with the former use of the cottage (as it would if it were an agricultural building). There is no location within the landscape where the key significances of the building can be experienced, while one is also (at the same time) able experience the existing character / land-use of the Site. The agricultural character of the wider landscape around the asset it is a very minor component of heritage significance, lying on the periphery of special architectural and historic interest. This allocation would not result in development in areas which are directly visible from the cottage, nor visible when walking towards the asset along its access road, and therefore the meaningful components of the asset's setting will be unchanged. Therefore, this allocation is not considered to result in any harm to the heritage significance and experience of Ramsey Cottage. Within the wider landscape, other assets were scoped out because they had no tangible historic or functional relationship with the Site, and intervening vegetation, built form and distance meant that there was no intervisibility between the Site and these assets.

Kempston House and The Cottage

Characteristics and Built Form

-
- 3.4. Kempston House (Photo 3) is a late 16th or early 17th century timber-framed house with an 18th century wing to the rear. The building was further extended and remodelled in the mid-19th century. The original wing is of close-studded timber framing with red brick nogging, and a hipped old clay tile roof. It is two storeys high and has attics.
- 3.5. The Cottage is an 18th century house with red brick and a thatched roof. It's two storeys high.

Experience

- 3.6. Kempston House is best appreciated from Home Road where its historic front façade can be appreciated (Photo 3). The Cottage was covered in scaffolding at the time of the Site visit as it was being rethatched. However, it seemed to be best appreciated from the road, where it could be viewed alongside Kempston House as an associated property. Both properties are located close to Home Road, but the road is quiet and does not get much through traffic due to the A6 being located to the east. At present the area around the assets is relatively quiet, protecting their rural ambience. The assets comprise a small cluster of buildings in an area that has not seen much historic development over the years, which adds to the experience as it allows them to be seen within a setting they have occupied for centuries. The modern flagpole in front of Kempston House does slightly reduce the impact of this isolation and presents a modern intrusion into an otherwise historic tableau but as it is only a single flagpole it does not significantly detract from the asset's setting. Generally, their physical surroundings comprise an agricultural landscape consisting of the arable field which makes up the Site to the south-east and pasture with preserved ridge and furrow to the south-west. Other assets in the surrounding area do not appear to have a tangible historical association with these buildings, beyond the possibility that occupiers of these buildings may have worked on agricultural land held by the owners of Kempston House. The areas of pasture and arable land closest to the Site make the strongest contribution to the setting of these buildings through preservation of the Site's immediate rural setting, but agricultural land closer to the north of Gibraltar Corner could also be seen to make a small contribution to the wider setting.



Photo 2 Kempston House

The Contribution of the Site to the Listed Buildings

- 3.7. The Site forms part of this agricultural landscape that would have isolated these properties from other built form in the surrounding area. Cropmarks suggestive of ridge and furrow in the west of the Site suggests that this landscape has been in existence since at least the medieval period.
- 3.8. This agricultural setting makes a positive contribution to the significance of both of these assets, which the Site presently contributes positively to as it provides separation from built form at Gibraltar, allowing Green End to be seen as a historic hamlet in its own right. The change of character (agricultural to residential) would negatively impact on this aspect of the assets' setting, if allowed to encroach too far up Home Road; thus, this could harm its heritage significance. Views from the assets towards most of the Site are readily appreciable as there is no dense intervening tree coverage between the Site boundary and these assets. However, the east is shielded from the Cottage and partially shielded from the House because of modern vegetation and built form associated with a garden nursery immediately adjacent to the Site's boundary in the north-east.
- 3.9. The masterplan for this Site currently indicates that the Site will be subjected to built development up to the southern extent of this garden nursery, and that only the land immediately west of the nursery will be retained as open space. Such an allocation has the potential to cause less than substantial harm (at the lower end of the spectrum) to the significance of these assets through its impact on the perception of these assets within an agricultural landscape and historic hamlet of Green End. In accordance with

policy 41S of the Local Plan and paragraph 202 of the NPPF, this harm will need to be weighed against the public benefits of the proposal(s), but impact on the setting of these assets could be mitigated through allocation of only the southern and eastern parts of the Site for development, and landscaping across the northern part of the Site. It is suggested that some development immediately north of the existing settlement of Gibraltar, whilst potentially visible from the Site, would have a limited impact (limited quantum of less than substantial harm) on the significance of the assets as it would preserve the separation between Green End hamlet and new development..

4. SUMMARY AND RECOMMENDATIONS

- 4.1. This heritage appraisal has been prepared to provide a high-level assessment of the heritage sensitivities with regard to the historic environment resource within and in the vicinity of the Site, including potential archaeological remains and built heritage.

Archaeological remains

- 4.2. Nearby archaeological investigations have identified a number of finds and features dating to the Neolithic to medieval periods. Based on this evidence, the Site is considered to have potential for finds or features dating from the Neolithic to medieval periods, with particular potential for finds dating to the Late Iron Age, Roman and medieval periods. Cropmarks around the Site show that the area has been subjected to Ridge and Furrow. It is likely that buried features associated with Ridge and Furrow and/or other medieval/post-medieval agricultural practices could be present within both parts of the Site.
- 4.3. Any development on the Site in future would result in the disturbance to, or loss of, any buried archaeological remains which may be present. Archaeological remains comprise an important, non-renewable and finite resource, and the construction impacts could result in permanent and irreversible loss of, or damage to, any potential buried archaeological remains which may be present within the Site. Any buried archaeological remains within the Site are unlikely to represent an absolute constraint on development, although the known and potential remains would require consideration as part of the planning process.

Built Heritage

- 4.4. The Site forms part of an agricultural landscape which would have isolated the built heritage assets in Green End hamlet from other built form in the surrounding area. Cropmarks suggestive of ridge and furrow in the west of the Site suggests that this landscape has been in existence since at least the medieval period.
- 4.5. The sense of separation the Site provides from built form at Gibraltar allows Green End and its Listed Buildings to be seen as a historic hamlet in its own right. Changes to this landscape would adversely impact on this aspect of the assets' setting (causing harm to significance), if allowed to encroach too far up Home Road in line with the current masterplans. Views from the assets towards most of the Site is readily appreciable as there is no dense intervening tree coverage between the Site boundary and these assets. The adverse impacts on the setting of these assets (less than substantial harm

to their significance) could be mitigated through development within only the southern and eastern parts of the Site. This would retain the separation between the hamlet of Green End and new development and allow these assets to keep their significance as an intelligible post-medieval hamlet. However, in accordance with policy 41S of the Local Plan and paragraph 202 of the NPPF, any harm will need to be weighed against the public benefits of the proposals when determining how much of the Site are allocated for development.

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1950	Ordnance Survey Map, 1:10,560

APPENDIX 1: HERITAGE STATUTE POLICY & GUIDANCE

Heritage Statute: Scheduled Monuments

Scheduled Monuments are subject to the provisions of the Ancient Monuments and Archaeological Areas Act 1979. The Act sets out the controls of works affecting Scheduled Monuments and other related matters. Contrary to the requirements of the Planning Act 1990 regarding Listed buildings, the 1979 Act does not include provision for the ‘setting’ of Scheduled Monuments.

Heritage Statute: Listed Buildings

Listed buildings are buildings of ‘special architectural or historic interest’ and are subject to the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 (‘the Act’). Under Section 7 of the Act ‘no person shall execute or cause to be executed any works for the demolition of a listed building or for its alteration or extension in any manner which would affect its character as a building of special architectural or historic interest, unless the works are authorised.’ Such works are authorised under Listed Building Consent. Under Section 66 of the Act ‘In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any feature of special architectural or historic interest which it possesses’.

Note on the extent of a Listed Building

Under Section 1(5) of the Act, a structure may be deemed part of a Listed Building if it is:

- (a) fixed to the building, or
- (b) within the curtilage of the building, which, although not fixed to the building, forms part of the land and has done so since before 1st July 1948

The inclusion of a structure deemed to be within the ‘curtilage’ of a building thus means that it is subject to the same statutory controls as the principal Listed Building. Inclusion within this duty is not, however, an automatic indicator of ‘heritage significance’ both as defined within the NPPF (2021) and within Conservation Principles (see Section 2 above). In such cases, the significance of the structure needs to be assessed both in its own right and in the contribution it makes to the significance and character of the principal Listed Building. The practical effect of the inclusion in the listing of ancillary structures is limited by the requirement that Listed Building Consent is only needed for works to the ‘Listed Building’ (to include the building in the list and all the ancillary items) where they affect the special character of the Listed building as a whole.

Guidance is provided by Historic England on '[Listed Buildings and Curtilage: Historic England Advice Note 10](#)' (Historic England 2018).

Heritage Statue: Conservation Areas

Conservation Areas are designated by the local planning authority under Section 69(1)(a) of the Planning (Listed Buildings and Conservation Areas) Act 1990 ('the Act'), which requires that '*Every local planning authority shall from time to time determine which parts of their area are areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance*'. Section 72 of the Act requires that '*special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area*'.

The requirements of the Act only apply to land within a Conservation Area; not to land outside it. This has been clarified in various Appeal Decisions (for example APP/F1610/A/14/2213318 Land south of Cirencester Road, Fairford, Paragraph 65: '*The Section 72 duty only applies to buildings or land in a Conservation Area, and so does not apply in this case as the site lies outside the Conservation Area.*').

The NPPF (2021) also clarifies in [Paragraph 207](#) that '*Not all elements of a World Heritage Site or Conservation Area will necessarily contribute to its significance*'. Thus land or buildings may be a part of a Conservation Area, but may not necessarily be of architectural or historical significance. Similarly, not all elements of the setting of a Conservation Area will necessarily contribute to its significance, or to an equal degree.

National heritage policy: the National Planning Policy Framework

Heritage assets and heritage significance

Heritage assets comprise 'a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest' (the NPPF (2021), Annex 2). Designated heritage assets include World Heritage Sites, Scheduled Monuments, Listed Buildings, Protected Wreck Sites, Registered Parks and Gardens, Registered Battlefields and Conservation Areas (designated under the relevant legislation; NPPF (2021), Annex 2). The NPPF (2021), Annex 2, states that the significance of a heritage asset may be archaeological, architectural, artistic or historic. Historic England's 'Conservation Principles' looks at significance as a series of 'values' which include 'evidential', 'historical', 'aesthetic' and 'communal'.

The July 2019 revision of the Planning Practice Guidance (PPG) expanded on the definition of non-designated heritage assets. It states *that 'Non-designated heritage assets are buildings, monuments, sites, places, areas or landscapes identified by plan-making bodies as*

having a degree of heritage significance meriting consideration in planning decisions, but which do not meet the criteria for designated heritage assets.’ It goes on to refer to local/neighbourhood plans, conservation area appraisals/reviews, and importantly, the local Historic Environment Record (HER) as examples of where these assets may be identified, but specifically notes that such identification should be *made ‘based on sound evidence’*, with this information *‘accessible to the public to provide greater clarity and certainly for developers and decision makers’*.

This defines *non-designated heritage assets* as those which have been specially defined as such through the local HER or other source made accessible to the public by the plan-making body. Where HERs or equivalent lists do not specifically refer to an asset as a *non-designated heritage asset*, it is assumed that it has not met criteria for the plan-making body to define it as such, and will be referred to as a *heritage asset* for the purpose of this report.

The assessment of *non-designated heritage assets* and *heritage assets* will be equivalent in this report, in line with industry standards and guidance on assessing significance and impact. They may not, however, carry equivalent weight in planning as set out within the provisions of the NPPF, should there be any effect to significance.

The setting of heritage assets

The ‘setting’ of a heritage asset comprises ‘the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral’ (NPPF (2021), Annex 2). Thus it is important to note that ‘setting’ is not a heritage asset: it may contribute to the value of a heritage asset.

Guidance on assessing the effects of change upon the setting and significance of heritage assets is provided in ‘Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets’, which has been utilised for the present assessment (see below).

Levels of information to support planning applications

Paragraph 194 of the NPPF (2021) identifies that ‘In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance’.

Designated heritage assets

Paragraph 189 of the NPPF (2021) explains that heritage assets 'are an irreplaceable resource and should be conserved in a manner appropriate to their significance'. Paragraph 199 notes that 'when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance'. Paragraph 200 goes on to note that 'substantial harm to or loss of a grade II listed building...should be exceptional and substantial harm to or loss of designated heritage assets of the highest significance (notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites)...should be wholly exceptional'.

Paragraph 202 clarifies that 'Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including, where appropriate, securing its optimum viable use'.

Bedford Borough Local Plan

Bedford Borough Council Local Plan 2030 was adopted in January 2020. It contains the following policy relevant to the Site.

Policy 41S - Historic environment and heritage assets

- i. Where a proposal would affect a heritage asset the applicant will be required to describe:
 - a. The significance of the asset including any contribution made by its setting and impacts of the proposal on this significance, and
 - b. The justification for the proposal, how it seeks to preserve or enhance the asset/setting or where this is not possible, how it seeks to minimise the harm.
- ii. This description must be in the form of one or a combination of: a desk based assessment; heritage statement; heritage impact assessment; and/or archaeological field evaluation. Further information will be requested where applicants have failed to provide assessment proportionate to the significance of the assets affected and sufficient to inform the decision-making process.

iii. Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset or nondesignated heritage asset of archaeological interest of demonstrably equivalent significance to a scheduled monument, consent will be refused unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- a. the nature of the heritage asset prevents all reasonable uses of the site; and
- b. no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
- c. conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and
- d. the harm or loss is outweighed by the benefit of bringing the site back into use.

iv. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm will be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

v. In considering proposals affecting designated heritage assets or a nondesignated heritage asset of archaeological interest of demonstrably equivalent significance to a scheduled monument, involving their alteration, extension, demolition, change of use and/or development in their setting, the Council will include in their consideration as appropriate:

- a. The asset's archaeological, architectural, artistic and historic interest and any contribution to its significance from setting (including the wider historic landscape)
- b. scale, form, layout, density, design, quality and type of materials, and architectural detailing
- c. boundary treatments and means of enclosure
- d. implications of associated car parking, services and other environmental factors
- e. effect on streetscape, roofscape and skyline including important views within, into or out of heritage assets
- f. impact on open space which contributes positively to the character and/or appearance of heritage assets

g. the positive benefits of the proposal in addressing heritage at risk.

vi. Where heritage assets are included on a Local List and are affected by development proposals the Council will afford weight proportionate to their heritage significance in the decision-making process to protect and conserve the significance which underpins their inclusion. Partial or total loss adversely impacting this significance will require clear and convincing justification.

vii. The effect of proposals on the significance of non-designated heritage assets will be taken into account in determining applications for development. Applications which result in harm or loss of significance to non-designated heritage assets will only be supported if clear and convincing justification has been demonstrated. In making a decision, the Council will weigh the significance of the heritage asset affected against the scale of any harm or loss to it.

viii. Where applications are permitted which will result in (total or partial) loss to a heritage asset's significance (including where preservation in situ of buried archaeological remains is not necessary or feasible), applicants will be required to arrange for further assessment of and recording of this significance in advance of, and where required, during development/works. This assessment and recording must be undertaken by a suitably qualified specialist in accordance with a design brief set by the Council's Historic Environment Team. The work might include: - archaeological and/or historic building fieldwork, - post-excavation/recording assessment, analysis, interpretation, - archiving with the local depository, and - presentation to the public of the results and finds in a form to be agreed with the Council.

As a minimum, presentation of the results should be submitted to the Bedford Borough Historic Environment Record and where appropriate, will be required at the asset itself through on-site interpretation.

Good Practice Advice 1-3

Historic England has issued three Good Practice Advice notes ('GPA1-3') which support the NPPF. The GPAs note that they do not constitute a statement of Government policy, nor do they seek to prescribe a single methodology: their purpose is to assist local authorities, planners, heritage consultants, and other stakeholders in the implementation of policy set out in the NPPF. This report has been produced in the context of this advice, particularly 'GPA2 – Managing Significance in Decision-Taking in the Historic Environment' and 'GPA3 – The Setting of Heritage Assets'.

GPA2 - Managing Significance in Decision-Taking in the Historic Environment

GPA2 sets out the requirement for assessing ‘heritage significance’ as part of the application process. Paragraph 8 notes ‘understanding the nature of the significance is important to understanding the need for and best means of conservation.’ This includes assessing the extent and level of significance, including the contribution made by its ‘setting’ (see GPA3 below). GPA2 notes that ‘a desk-based assessment will determine, as far as is reasonably possible from existing records, the nature, extent and significance of the historic environment within a specified area, and the impact of the proposed development on the significance of the historic environment, or will identify the need for further evaluation to do so’ (Page 3).

GPA3 – The Setting of Heritage Assets

The NPPF (Annex 2: Glossary) defines the setting of a heritage asset as ‘the surroundings in which a heritage asset is experienced...’. Step 1 of the settings assessment requires heritage assets which may be affected by development to be identified. Historic England notes that for the purposes of Step 1 this process will comprise heritage assets ‘where that experience is capable of being affected by a proposed development (in any way)...’.

Step 2 of the settings process ‘assess[es] the degree to which these settings and views make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated’, with regard to its physical surrounds; relationship with its surroundings and patterns of use; experiential effects such as noises or smells; and the way views allow the significance of the asset to be appreciated. Step 3 requires ‘assessing the effect of the proposed development on the significance of the asset(s)’ – specifically to ‘assess the effects of the proposed development, whether beneficial or harmful, on the significance or on the ability to appreciate it’, with regard to the location and siting of the development, its form and appearance, its permanence, and wider effects.

Step 4 of GPA3 provides commentary on ‘ways to maximise enhancement and avoid or minimise harm’. It notes (Paragraph 37) that ‘Maximum advantage can be secured if any effects on the significance of a heritage asset arising from development liable to affect its setting are considered from the project’s inception.’ It goes on to note (Paragraph 39) that ‘good design may reduce or remove the harm, or provide enhancement’.

Heritage significance

Discussion of heritage significance within this assessment report makes reference to several key documents. With regard to Listed buildings and Conservation Areas it primarily discusses

‘architectural and historic interest’, which comprises the special interest for which they are designated.

The NPPF provides a definition of ‘significance’ for heritage policy (Annex 2). This states that heritage significance comprises ‘The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic’. This also clarifies that for World Heritage Sites ‘the cultural value described within each site’s Statement of Outstanding Universal Value forms part of its significance’.

Regarding ‘levels’ of significance the NPPF (2021) provides a distinction between: designated heritage assets of the highest significance; designated heritage assets not of the highest significance; and non-designated heritage assets.

Historic England’s ‘Conservation Principles’ expresses ‘heritage significance’ as comprising a combination of one or more of: evidential value; historical value; aesthetic value; and communal value:

- Evidential value – the elements of a historic asset that can provide evidence about past human activity, including physical remains, historic fabric, documentary/pictorial records. This evidence can provide information on the origin of the asset, what it was used for, and how it changed over time.
- Historical value (illustrative) – how a historic asset may illustrate its past life, including changing uses of the asset over time.
- Historical value (associative) – how a historic asset may be associated with a notable family, person, event, or moment, including changing uses of the asset over time.
- Aesthetic value – the way in which people draw sensory and intellectual stimulation from a historic asset. This may include its form, external appearance, and its setting, and may change over time.
- Communal value – the meaning of a historic asset to the people who relate to it. This may be a collective experience, or a memory, and can be commemorative or symbolic to individuals or groups, such as memorable events, attitudes, and periods of history. This includes social values, which relates to the role of the historic asset as a place of social interactive, distinctiveness, coherence, economic, or spiritual / religious value.

Effects upon heritage assets

Heritage benefit

The NPPF clarifies that change in the setting of heritage assets may lead to heritage benefit. Paragraph 206 of the NPPF (2021) notes that ‘Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably’.

GPA3 notes that ‘good design may reduce or remove the harm, or provide enhancement’ (Paragraph 28). Historic England’s ‘Conservation Principles’ states that ‘Change to a significant place is inevitable, if only as a result of the passage of time, but can be neutral or beneficial in its effects on heritage values. It is only harmful if (and to the extent that) significance is reduced’ (Paragraph 84).

Specific heritage benefits may be presented through activities such as repair or restoration, as set out in Conservation Principles.

Heritage harm to designated heritage assets

The NPPF (2021) does not define what constitutes ‘substantial harm’. The High Court of Justice does provide a definition of this level of harm, as set out by Mr Justice Jay in *Bedford Borough Council v SoS for CLG and Nuon UK Ltd*. Paragraph 25 clarifies that, with regard to ‘substantial harm’: ‘Plainly in the context of physical harm, this would apply in the case of demolition or destruction, being a case of total loss. It would also apply to a case of serious damage to the structure of the building. In the context of non-physical or indirect harm, the yardstick was effectively the same. One was looking for an impact which would have such a serious impact on the significance of the asset that its significance was either vitiated altogether or very much reduced’.

Effects upon non-designated heritage assets

The NPPF (2021) paragraph 203 guides that ‘The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that affect directly or indirectly non-designated heritage assets, a balanced judgment will be required having regard to the scale of any harm or loss and the significance of the heritage asset’.

APPENDIX 2: GAZETTEER OF SELECTED RECORDED HERITAGE ASSETS

Ref	Description	Grade/Period	NGR	HE ref. HER ref.
A	The Cottage (now Old Groom's Cottage), Kempston House, Green End 18th century house with evidence of earlier timber-framed work, thatched roof and red brick. Two storeys.	Grade II, post-medieval	TL 0088 4731	1114284 8706 MBD8706
B	Kempston House, Green End A late 16th or early 17th century house with extensive 18th and 19th century additions and remodelling.	Grade II, post-medieval	TL 0082 4735	1114285 1706 MBD1706
C	Ramsey Cottage Late 17th or early 18th century timber framed house with thatched roof.	Grade II, post-medieval	TL 0059 4726	1321547 1707 MBD1707
II	Medieval settlement A small group of truncated Late Saxon pits overlain by the remains of at least three medieval buildings. The earliest building was constructed out of timber, but the other two structures had stone foundations. A detached kitchen containing three ovens produced a silver coin dating to 1278-1280 AD. The stone foundations and separate kitchen suggest that this was a relatively high-status settlement. A possible prehistoric pit was also identified.	Prehistoric, Anglo-Saxon, medieval	TL 0135 4724	EBB1024

Andover Office

Stanley House
Walworth Road
Andover
Hampshire
SP10 5LH

t: 01264 347630

Cirencester Office

Building 11
Cotswold Business Park
Cirencester
Gloucestershire
GL7 6BQ

t: 01285 771022

Milton Keynes Office

Unit 8 - The IO Centre
Fingle Drive, Stonebridge
Milton Keynes
Buckinghamshire
MK13 0AT

t: 01908 564660

Suffolk Office

Unit 5, Plot 11, Maitland Road
Lion Barn Industrial Estate
Needham Market
Suffolk
IP6 8NZ

t: 01449 900120

e: enquiries@cotswoldarchaeology.co.uk

