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# Heritage Impact Assessment

Land East of Wixams, Bedfordshire

March 2021

**Heritage Impact Assessment**  
**Land East of Wixams, Bedfordshire**

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## 1.0 INTRODUCTION

### Purpose and Scope

- 1.1 Barton Willmore has been instructed by L&Q to prepare a Heritage Impact Assessment to support the promotion of land East of Wixams, Bedfordshire (“the Site”) for residential development of up to 2,000 dwellings.
- 1.2 Paragraph 185 of the National Planning Policy Framework (NPPF) guides that plan-making should set out a positive strategy for the conservation of the historic environment recognising ‘the wider social, cultural, economic and environmental benefits’ conservation can bring as well as the ‘opportunities the contribution the historic environment can make to the character of a place’.
- 1.3 Paragraph 189 of the NPPF requires applicants to describe the significance of those assets potentially affected by proposed development. This assessment should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposed development on that significance. That is the purpose of this statement.
- 1.4 The assessment follows the 5-step approach advised in Historic England’s guidance on Site Allocations in Local Plans (Advice Note 3, 2015). The Statement of Significance adheres to the heritage interest-led approach set out in the NPPF, comprising archaeological, architectural, artistic, and historic interest. This has been guided by the definitions provided in the updated ‘Planning Policy Guidance (2014, as updated)’<sup>i</sup>. The assessment of the contribution made by the setting of the heritage assets follows the staged assessment approach set out in Historic England’s guidance document ‘Historic Environment Good Practice Advice in Planning Note 3 (Second Edition): The Setting of Heritage Assets’ (GPA3, 2017)<sup>ii</sup>.
- 1.5 The Statement of Significance set out in this report has been informed by a site visit undertaken in February 2021 along with desktop research.
- 1.6 The scope of this Heritage Statement appraises the heritage significance of the built structures. It does not consider the known or unknown archaeological potential of the site.

## 2.0 SITE CONTEXT

2.1 The Site is located to the east of the settlement of Wixams, approximately 3 km south of Bedford. The site is formed of a parcel of land on the edge of the village and is currently agricultural land. The Site is bordered by the A6 to the west and agricultural fields to the east. The easternmost edge of the Site lies adjacent to the John Bunyan Trail bridleyway which bisects the fields, running parallel to the A6 and A600 and is a well-used recreational route.

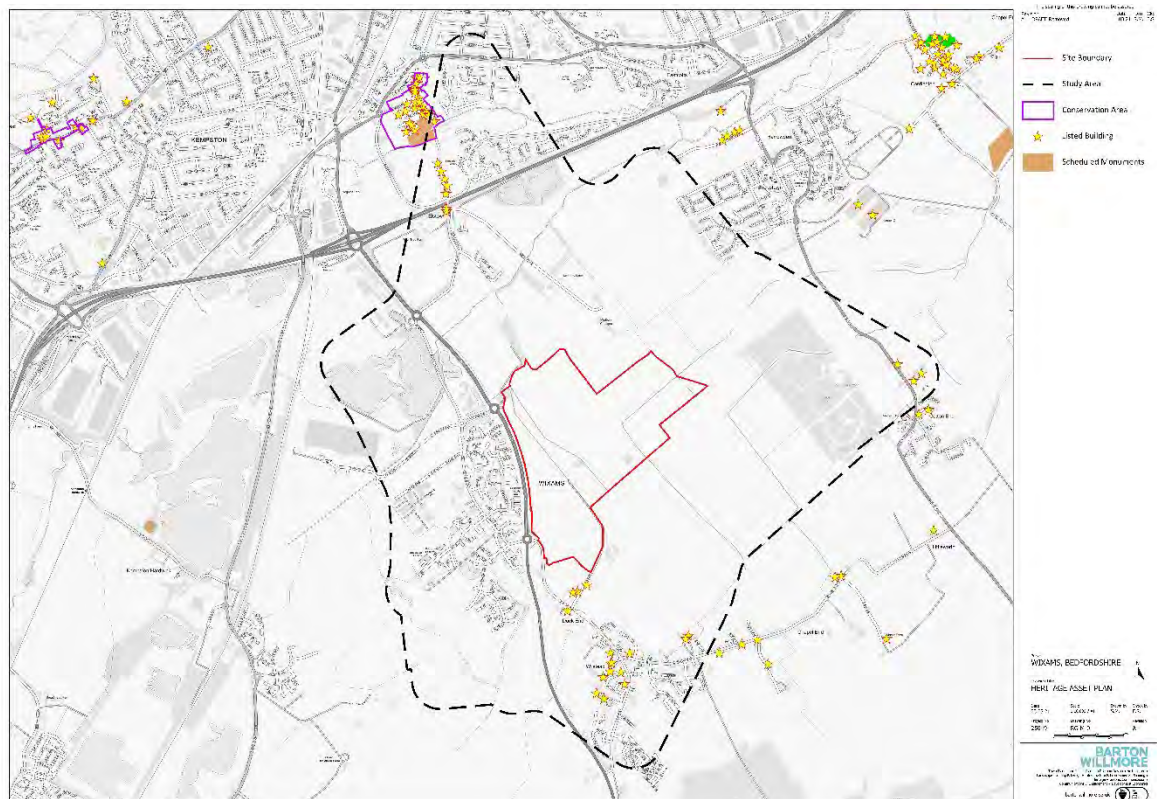


Figure 1 Heritage Asset Plan

### Heritage Assets

#### Designated Heritage Assets

2.2 A study area of 1km was identified as being appropriate for the nature of the proposed development. Within this study area a number of designated heritage assets have been identified as having the potential to be impacted by the proposed development. Following the site visit, the following designated assets have been taken forward for assessment, including two assets outside of the 1km study area. These are shown on Figure 1 above:

- 4no. Grade II listed buildings at Duck End Lane: Vicarage Farmhouse; Dove Cottage; Duck End Farmhouse; and, Barn at Duck End Farm.
- 12no. listed buildings at Wilstead; including, Grade II\* Parish Church of All Saints.
- Cardington Hangers – both listed at Grade II\*.
- Elstow Conservation Area; including listed buildings and scheduled monument.

2.3 The site visit and desktop research confirmed that the group of listed buildings at Cotton End within the study area would not be affected by the proposals. This is due to the intervening distance, topography and landscape features, including the Shocott Spring woodland that provides a significant landscape buffer to the Cotton End heritage assets. As such, they have been scoped out of this assessment.

2.4 Whilst the Elstow Conservation Area and Cardington Hangers are not located within the 1km study area, it is considered that there is potential for an impact on their setting and have therefore been scoped in.

2.5 Listed buildings and conservation areas are statutorily protected through the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended (“the Act”). Section 66 places a statutory duty for the desirability to preserve the settings of listed buildings. There is no statutory duty to preserve the setting of a conservation area or scheduled monument.

#### *Non-designated Heritage Assets*

2.6 At the time of writing, Bedford Borough Council does not have a Local List identifying non-designated heritage assets.

2.7 An online search of the Bedfordshire Historic Environment Record (HER) has identified a number of entries within 1km of the Site which are predominantly archaeological deposits. By virtue of their distance from the Site and the nature of the assets, none of the entries relating to built heritage are considered to be impacted by the potential development of the Site. The scope of this Heritage Statement does not include a consideration of known or unknown archaeological potential of the Site.

#### **Heritage Policy Framework**

2.8 A summary of the relevant heritage decision-making framework is set out below. The full policy framework is set out in Appendix 2.

## **National Planning Policy**

- 2.9 The NPPF sets out the Government planning policy, with Chapter 16 providing policy guidance for conserving and enhancing the historic environment. The guidance recognises the importance of preserving heritage assets in a manner appropriate to their significance and guides that any harm or loss to their significance should require clear and convincing justification. Implementation of the NPPF is supported by the Planning Practice Guidance (PPG).
- 2.10 Paragraph 193 advises that great weight should be given to an asset's conservation; the more important the asset, the greater this weight should be. It goes on to state that significance can be harmed or lost through alteration or destruction of the heritage asset, or development within its setting. Any such harm or loss should require clear and convincing justification.
- 2.11 Paragraphs 195 and 196 set out two decision-making tests where proposals would lead to substantial and less than substantial harm, respectively. Paragraph 196 guides that where a development proposal would lead to less than substantial harm, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.
- 2.12 Implementation of the NPPF is supported by the Planning Practice Guidance (PPG) (2014 with updates).

### 3.0 STATEMENT OF SIGNIFICANCE

#### Definitions

- 3.1 Heritage significance is defined in Annex 2 of the National Planning Policy Framework (2019) (NPPF) as:

**“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. Significance derives not only from a heritage asset’s physical presence, but also from its setting.”**

- 3.2 The NPPF definition of significance further guides that in the planning context, heritage interest may be archaeological, architectural, artistic or historic. The definitions below are provided in the updated Planning Practice Guidance (PPG)

**“Archaeological Interest: As defined in the Glossary to the NPPF, there will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.**

**Architectural and Artistic Interest: These are interests in the design and general aesthetics of a place. They can arise from conscious design or fortuitously from the way the heritage asset has evolved. More specifically, architectural interest is an interest in the art or science of the design, construction, craftsmanship and decoration of buildings and structures of all types. Artistic interest is an interest in other human creative skill, like sculpture.**

**Historic Interest: An interest in past lives and events (including pre-historic). Heritage assets can illustrate or be associated with them. Heritage assets with historic interest not only provide a material record of our nation’s history, but can also provide meaning for communities derived from their collective experience of a place and can symbolise wider values such as faith and cultural identity”.**

- 3.3 The setting of a heritage asset is described in Annex 2 of the NPPF as:

**“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 may be neutral.”**



## Statement of Significance

3.4 The heritage interests of the heritage assets identified in Section 2 are considered below:

*4no. Grade II listed buildings at Duck End Lane: Vicarage Farmhouse; Dove Cottage; Duck End Farmhouse; and Barn at Duck End Farm.*



*Figure 2 (L) Vicarage Farm; (R) Barn at Duck End Farm.*



*Figure 3 (L) Duck End Farmhouse; (R) Dove Cottage.*

3.5 This group of buildings are located to the western end of the village of Wilstead, along Duck End Lane with Vicarage Farmhouse<sup>iii</sup> at the junction with Bedford Road. They are listed for their special architectural and historic interest, largely dating to the 17<sup>th</sup>-century, and constructed in the local vernacular with later additions.

### *Setting*

3.6 The setting of Vicarage Farmhouse is clearly defined in the landscape by its residential curtilage and former agricultural outbuildings. To the east and south remain open fields that were historically associated with the farmstead, whilst to the north lies Duck End Farm. These aspects contribute positively to the setting of Vicarage Farmhouse, however the modern houses located to the west that line the southern side of Bedford Road do

not. The Site lies to the north of Bedford Road, at a distance from Vicarage Farmhouse and buffered by mature planting and does not contribute to its setting.

- 3.7 Along Duck End Lane is Duck End Farmhouse<sup>iv</sup> and Barn, and Dove Cottage<sup>v</sup>. These buildings have a close spatial relationship, although Dove Cottage appears to have no associative links to the farm. Dove Cottage has a clear residential curtilage defined by planted boundaries with agricultural land to its east. Across the lane is Duck End Farmhouse and Barn. These two buildings hold group value as part of the historic farmstead. To their north and west are fields laid to pasture which remain associated with the farmstead. The Site lies to the north beyond these fields and whilst there are glimpsed views through mature trees and planting, the Site contributes little to their heritage significance other than forming part of their wider agricultural context.



Figure 4 1809 Wilshamstead Parish Inclosure Map (Genealogist)

*14no. Listed buildings at Wilstead; including the Grade II\* Parish Church of All Saints*



*Figure 5 (L) All Saints Church; (R) No.s 7 & 8 Church Road.*



*Figure 6 (L) The Old Manor House; (R) Manor Farmhouse and Granary, viewed from Cotton End Road.*

- 3.8 The village of Wilstead lies within the study area c.600m to the south of the Site and includes 14 listed buildings. Outside of the study area further to the east are 4no. Grade II listed buildings along Cotton End Road.
- 3.9 The majority of the listed buildings within the study area are concentrated along Church Road and Vicarage Lane to the west of the Bedford/Luton Road within the historic core of the village and close to the Grade II\* Parish Church of All Saints. The heritage significance of the Church and other listed buildings within this grouping is derived from their architectural and historic interest, providing evidence of the early development of Wilstead. The Church is the oldest of the group, with 13<sup>th</sup> century origins and later alterations and editions, including by Sir Arthur Bloomfield in the latter 19<sup>th</sup> century. The surrounding residential properties date primarily from the 17<sup>th</sup> and 18<sup>th</sup> centuries and are constructed in the local vernacular, incorporating timber framing, thatch and red brick.
- 3.10 Manor Farmhouse and its Granary are situated to the north of the village, set back from Cotton End Road with a long, forked drive across an open field providing both residential and farm access. Manor Farmhouse is one of the oldest residential properties within the

village of Wilstead, dating from the 16<sup>th</sup> century. The property is of timber framed construction with an H-plan form beneath a tiled roof. The granary associated at the farmstead is also listed and confers the status and importance of the farm.

### *Setting*

- 3.11 The setting of the listed buildings around, and including, the Church relates to the historic development of the village, with buildings located to the east and open fields to the west. The building plots are generally well defined through the use of hedgerows, whilst the churchyard itself is heavily treed. To the south of the Church, Little Church Farm and Church Farm were historically one entity, until Church Farm was separated in the mid-19<sup>th</sup> century.<sup>vi</sup> The Site makes no contribution to the significance of these assets, being located c.600m to the north and detached by the intervening built and natural environment.
- 3.12 The setting of the Manor Farm listed buildings, comprises agricultural land to the north with the built form of the village to the south. Nevertheless, mature hedgerow planting along field boundaries obscure views between the Site and Manor Farm. Furthermore, evidence provided by historic mapping does not indicate any associative or functional relationship between Manor Farm and the Site. The Site does not, therefore, contribute to the significance of these assets other than forming part of their wider landscape setting.

### *Cardington Hangers*



*Figure 7 Cardington Hanger's viewed from the John Bunyan Trail*

- 3.13 The two Cardington Hangers are located outside of the study area, some 1.6km to the north of the Site. However, they have been scoped in due to the large scale of the buildings and their visibility from the Site.

- 3.14 As Grade II\* listed buildings, the Cardington Sheds are listed at the higher tiers of designation and the list descriptions note the importance of the Sheds to the development of airship technology in Europe.
- 3.15 The heritage significance of the two sheds is derived primarily from their architectural and historic interest. The Sheds are rare surviving examples of early airship hangars, with only three of this date surviving throughout the UK. Shed 1 is the only in situ example in Europe of a pre-1918 airshed. Shed 2 is later, dating from 1928 and is formed from a shed transported from Pulham, Norfolk which was then enlarged to house the R100 airship. Their rarity both nationally and internationally increases their significance and means that the sheds as a group and individually are of exceptional historic interest.
- 3.16 Both sheds are vast in size and their construction in the early 20<sup>th</sup> century as some of the largest buildings of their type in Britain makes them an important remnant in the development of airship technology in the UK, both in use for commercial and military use. Their industrial appearance and scale make them landmark structures within the surrounding landscape. Their design and materiality are entirely functional in nature and their size reflects the scale of the airships being constructed within them. They do not display any particular architectural features of note and their architectural interest derives from their construction as a piece of industrial scale engineering.

#### *Setting*

- 3.17 The setting of No.1 and No.2 Sheds is intrinsically linked given their close associative links. Historically the land to the west and south of the Sheds contained the airfield associated with the development of the airships at the site and its use during the Second World War as an RAF base. Remnants of earthworks and features associated with the airfield remain visible on aerial photographs and satellite imagery. However, much of the surrounding area was left to grass as typical of airfields.
- 3.18 The settlement of Shortstown is located to the northwest of the sheds and the RAF site was immediately to the north of the sheds. Both were important features within their wider setting. Historically, the settlement of Shortstown, RAF Cardington and the Sheds all shared a close functional and associative relationship well into the late 20<sup>th</sup> century. Whilst the land to the south, east and west of the Sheds remained open to allow for the manoeuvring of the large-scale airships. The tethering mast was located approximately 900m to the south of Shed 2. In more recent times, the closure of the RAF base in 2000 and its redevelopment for housing has resulted in a change to the setting of the Sheds in this location.



*Figure 8 View towards the Hanger's from the public footpath adjacent to the Site.*

- 3.19 Due to the scale of the Sheds, they are considered landmark structures that are visible within the wider landscape. There are several long-distance views of the sheds, in which they appear visually prominent, particularly the iconic views from Cardington in the east, and the A600, the John Bunyan Trail and A6 to the southwest.
- 3.20 The Site is located 1.6km to the southwest of the Sheds and is not considered to contribute to their significance, given there is no historic or associative links between the two. However, the Site does allow for long distance views from the public footpaths that cross the Site, as well as fleeting views from the A6 across the open land towards them, with their silhouette identifiable on the skyline. Nevertheless, given the speeds of vehicles travelling along the A6, the views are not significant and more generally, the long-distance views of the Sheds are commonplace in the area due to their large scale and massing.

*Elstow Conservation Area; including associated listed buildings and scheduled monument*



Figure 9 (L) Moot Hall and the Green; (R) view from Wilstead Road east towards the Abbey Church and ruins

3.21 The Elstow Conservation Area is located c.1.6km to the north of the Site. Its boundary is concentrated on the Green and Moot Hall and the adjacent Abbey Church of St Mary and St Helena and the scheduled remains of Hillersden Mansion and Elstow Abbey. The adopted Elstow Conservation Area Character Appraisal and Management Plan (2010) identifies the following principal features of the area as:

- **"The village Green with its Moot Hall (a museum) and remains of the medieval market cross**
- **The group of historic and architecturally important buildings comprising the Abbey church of St Mary and St Helena, church tower and remains of the Hillersden Mansion**
- **The rows of 'black and white' timber framed buildings along the east side of the High Street**
- **The wealth of historic buildings throughout the conservation area.**
- **The archaeological significance of the area**
- **Views from the High Street across to the church, tower and Hillersden Mansion ruins**
- **Strong historic associations with John Bunyan**
- **The row of Southill estate cottages on the north side of West End Lane."**

*Setting*

*Figure 10 Aerial view highlighting the wider context of the Elstow Conservation Area (outlined in red) (Google Satellite View, March 2021)*

- 3.22 The Conservation Area Character Appraisal and Management Plan identifies the contribution of its setting as:

**“Open spaces outside Elstow Conservation Area also impact upon its character, in particular the fields to the west between the A6 / Abbeyfields and the village; these provide distant views of the church and its associated tower and the village. These longer distance views are crucial to the setting of Elstow village and their importance has been recognised by being identified in the Local Plan as ‘Protected Views’ (Policy BE34a).”**

- 3.23 A key contributor to the significance of the Elstow Conservation Area is the parcel of open land which lies to its west, as identified above and largely included within the boundary. Outside of the Conservation Area’s boundary is open land to the south, beyond the brook, which whilst excluded from the boundary, is the remaining area of open land that refers back to Elstow’s historic rural character.
- 3.24 In addition to the open land to the south, there are several Grade II listed buildings spaced at regular intervals along the Wilstead Road to the south of the village which contribute to the heritage significance of the conservation area highlighting the importance of the route through the village during the medieval and late-medieval period. However, the remaining surroundings comprises C20 housing and commercial



developments and transport routes which provide a clear edge and boundary to the conservation area.

- 3.25 The Site is located c. 1.6km to the south of the conservation area and is severed from the conservation area by the A421 cutting. There are no views between the two owing to the topography of the land and presence of wooded belts to either side of the A421. Whilst the Site may form part of the wider rural context of Elstow, it does not contribute to the heritage significance of the area as a medieval village.

## 4.0 IMPACT ASSESSMENT

- 4.1 The assessment below seeks to identify the likely scale of impact resulting from the development of the Site for residential development up to 2,000 dwellings at a density of 30-40 dwellings per hectare with access taken from the A6. Whilst the layout of the development has not yet been submitted, the below assessment considers potential mitigation measures that would reduce any perceived heritage impact.
- 4.2 From the desk-top study and site visit, it was identified that the areas to the south near Duck End Lane and to the north have the greatest sensitivity in heritage terms and this should inform any emerging proposals for the Site.

### Impact on Heritage Assets



*Figure 11 Aerial view of the Site (outlined in red) (Google satellite view, March 2021)*

### ***Duck End Lane***

- 4.3 The group of Grade II listed buildings at Duck End Lane have the potential to be affected through development in their wider surroundings due to the proposed introduction of built form on the land to their north. This is particularly the case for Duck End Farmhouse and Barn due to the Site boundary adjoining the open land to the rear of the farmstead. From the site survey, it was noted, however, that the boundary to the farmhouse and barn is heavily planted, which screens the Site and heavily filters views looking north. Further

trees have been planted in recent years on the field immediately north of the Farmhouse which will increase the level of screening already experienced.

4.4 Notwithstanding, it is acknowledged that setting attributes are both visual and non-visual, and the change in character to the site has potential to erode the wider landscape setting of the asset which is characterised by large open fields divided by drainage ditches and hedgerows. However, it is not considered that the Site makes any meaningful contribution to how the asset is appreciated within the wider landscape, nor does it contribute to its heritage significance.

4.5 The erosion of this wider landscape setting, when considered alongside the existing and proposed landscape features, combined with the careful consideration of height, scale and massing of development could further reduce its impact through the careful modelling of the scheme, with lower building heights to the south closest to this group of listed buildings.

#### *Listed buildings at Wilstead*

4.6 The two groups of listed buildings at Wilstead are concentrated within the historic core of the village and to the east at Manor Farm. It is considered that these listed buildings would not be affected by the development of the Site.

4.7 For those listed building surrounding and including the Church, their significance is drawn from the historic core of the village and their relationships with one another as well as their wider residential context. This would not be altered by the development of the Site.

4.8 Regarding the group of Grade II listed buildings at Manor Farm, whilst these buildings lie further into the countryside surrounding Wilstead compared to those listed buildings close to the Church, they are surrounded by land that holds an associative and functional relationship with the farmstead which will not be altered by the development of the Site. Moreover, given the distances between the Site and the Manor Farm listed buildings, it is considered that there is a substantial buffer between the two which is further screened by way of existing hedgerows and field boundaries alongside the topography of the land. As such, the setting of Manor Farm, and by extension its heritage significance, would be sustained.

### ***Cardington Hangers***

- 4.9 The Grade II\* listed Cardington Hangers are a prominent landmark to the south of Bedford given their large size. Whilst the significance of these buildings relates to their scale and massing, they were constructed to be functional buildings in association with the development of airship technology rather than landmark structures in themselves.
- 4.10 The two Shed's are visible in several locations across the Site and its surroundings, particularly given the public footpaths that cross the Site. The proposed development of the Site would bring development closer to the Shed's but it would still be at some distance from them and would not compete with their scale and prominence in the locality. It is therefore considered that the proposed development of the Site would not affect the significance of these two listed buildings. Furthermore, the proposed development could incorporate new viewing corridors and increased public access with views towards the Shed's that would better reveal their significance.

### ***Elstow Conservation Area; including listed buildings and scheduled monument***

- 4.11 The Elstow Conservation Area is located c1.6km to the north of the Site. As discussed in Section 3 of this report, its setting is relatively self-contained, being largely defined by the expansion of Bedford to the north, east and west, and by the A421 cutting to the south. The site survey confirmed that there is no inter-visibility between the Site and the Conservation Area due to the topography of the land and intervening built and natural environment. Additionally, there is no historic association or functional relationship between Elstow and the Site. The proposed development of the Site would not therefore affect the heritage significance of the Elstow Conservation Area, its listed buildings or scheduled monument.

## 5.0 CONCLUSIONS

- 5.1 As set out in the statement of significance, the Site is not considered to make any contribution to the heritage significance of any of the identified heritage assets. Any impact arising from the development of the Site would be through the introduction of built form within their wider contextual surroundings by virtue of allocating the Site for development.
- 5.2 The setting of the heritage assets is largely confined to their immediate surroundings, however the Grade II listed buildings at Duck End Lane and the Grade II\* Cardington Hangers would experience the greatest change in their wider contextual surroundings due to the proximity of the Site and potential for built development on what is currently open agricultural land. Nevertheless, this is unlikely to affect their heritage significance given the existing landscape features within and surrounding the Site.
- 5.3 The future development of the Site would incorporate mitigation measures that would future reduce the perceived impact. It would be recommended that these include the retention and incorporation of existing historic landscape features such as copses, hedgerows and waterways to guide developable areas. Within the developable area's consideration would be given to the layout, scale and massing of the development which would all seek to mitigation impact on the wider surroundings of the heritage assets.
- 5.4 It would be recommended that any built form to the east of the Site by the John Bunyan Trail is set back with a landscape buffer with connections through to this recreational route. Viewing corridors could also be created here to better reveal the significance of the Grade II\* listed Cardington Hangers as a prominent landmark on the skyline.
- 5.5 Likewise, development close to Duck End would be recommended to have a lower density and scale to sustain the existing character along the lane. There are opportunities here to incorporate elements of the local vernacular such as to retain the local distinctiveness of the area, to further sustain the significance of the heritage assets in this location.
- 5.6 In principle, it is therefore proposed that the Site could be developed, subject to detailed design and landscaping proposals, in a manner that would preserve the special interest of the identified heritage assets, with minimal harm being caused to their setting. The heritage assets detailed within this Heritage Impact Assessment would not preclude the allocation of the Site for residential development and as such, the allocation would accord with the statutory duty set out in the 1990 Act and principles contained within the NPPF.

- 5.7 Should the Council consider that the proposed allocation of this Site would result in harm to the setting of any of the heritage assets identified, it is suggested that this would be within the bracket of less than substantial harm and that any low level of harm could be mitigated in any future planning application and reserved matters through considerate design, scale, layout and massing taking into account the mitigation measures identified above.

## References

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<sup>i</sup> MHCLG: Planning Policy Guidance, 2014 (as amended)

<sup>ii</sup> Historic Environment Good Practice Advice in Planning Note 3 (Second Edition): The Setting of Heritage Assets' (GPA3, 2017)

<sup>iii</sup>

<https://bedsarchives.bedford.gov.uk/CommunityHistories/Wilstead/VicarageFarmWilshamstead.aspx>

<sup>iv</sup>

<https://bedsarchives.bedford.gov.uk/CommunityHistories/Wilstead/DuckEndFarmWilshamstead.aspx>

<sup>v</sup>

<https://bedsarchives.bedford.gov.uk/CommunityHistories/Wilstead/DoveCottageWilshamstead.aspx>

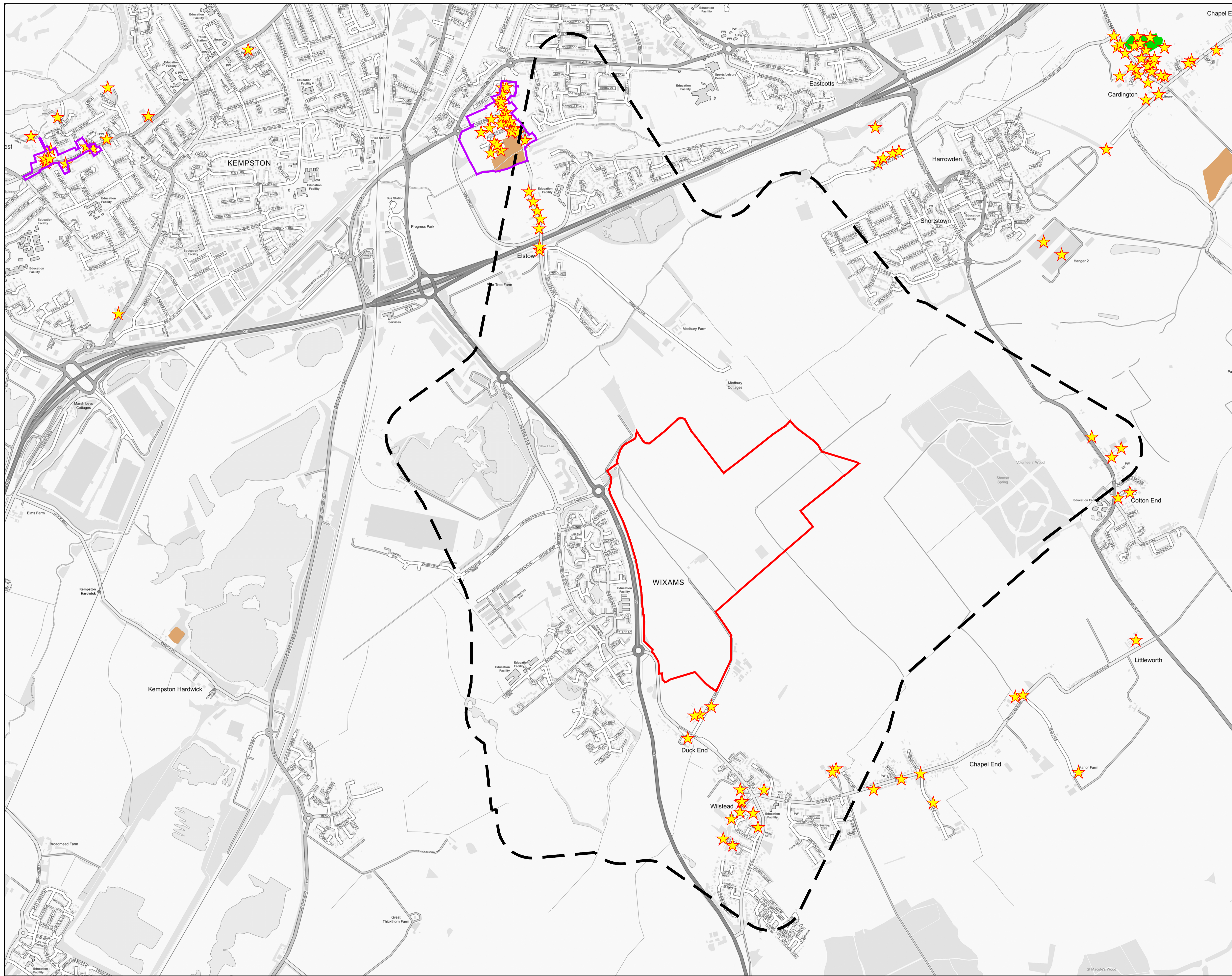
<sup>vi</sup>

<https://bedsarchives.bedford.gov.uk/CommunityHistories/Wilstead/LittleChurchFarmWilshamstead.aspx>

# **APPENDIX 1**

## **Heritage Asset Plan**





- Site Boundary
- Study Area
- Conservation Area
- ★ Listed Building
- Scheduled Monuments

Project:  
**WIXAMS, BEDFORDSHIRE**

Drawing Title:  
**HERITAGE ASSET PLAN**

Date: 03.03.21 Scale: 1:10,000 @A1 Drawn by: S.M. Check by: E.S.  
 Project No: 25649 Drawing No: RG-M-01 Revision: A

N

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# **APPENDIX 2**

## **Decision-Making Framework**

## **National Planning Policy Framework**

The National Planning Policy Framework (NPPF) (2019) sets out government planning policy. Chapter 16 sets out policies for conserving and enhancing the historic environment.

Paragraph 189 requires applicants to describe the heritage significance of heritage assets potentially affected by proposed development. This should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. Paragraph 190 places an onus on local planning authorities to identify and assess the significance on any heritage asset that may be affected, and to take this assessment into account when considering the impact of a proposal.

Paragraph 192 states that local planning authorities, in determining planning applications, should take account of: the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and the desirability of new development making a positive contribution to local character and distinctiveness.

Paragraph 193 advises that great weight should be given to an asset's conservation; the more important the asset, the greater this weight should be. It goes on to state that significance can be harmed or lost through alteration or destruction of the heritage asset, or development within its setting. Any such harm or loss should require clear and convincing justification.

Paragraphs 195 and 196 set out two decision-making tests where proposals would lead to substantial and less than substantial harm respectively. Paragraph 196 guides that where a development proposal would lead to less than substantial harm, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.

Paragraph 200 guides local planning authorities to look for opportunities for new development within conservation areas 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 or better reveal the significance of the asset should be treated favourably.

Implementation of the NPPF is supported by the Planning Practice Guidance (PPG), 2014 with updates. Paragraph 013 provides guidance regarding the setting of heritage assets. It notes that the setting of a heritage asset is defined in the Glossary of the National Planning Policy Framework.

All heritage assets have a setting, irrespective of the form in which they survive and whether they are designated or not. The setting of a heritage asset and the asset's curtilage may not have the same extent.

The extent and importance of setting is often expressed by reference to the visual relationship between the asset and the proposed development and associated visual/physical considerations. Although views of or from an asset will play an important part in the assessment of impacts on setting, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust, smell and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. For example, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each.

The contribution that setting makes to the significance of the heritage asset does not depend on there being public rights of way or an ability to otherwise access or experience that setting. The contribution may vary over time.

When assessing any application which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change. They may also need to consider the fact that developments which materially detract from the asset's significance may also damage its economic viability now, or in the future, thereby threatening its ongoing conservation.

(Paragraph: 013 Reference ID: 18a-013-20190723)

### **Local Planning Policy**

The Development Plan for Bedford Borough Council includes:

- Local Plan 2030

#### ***Local Plan***

#### **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 non-designated 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 non-designated 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, roovescape 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.

### ***Local Plan Review***

The Local Plan Review Issues and Options consultation held between 14 July and 4 September 2020. These will help write a draft plan which is proposed to be open for consultation in mid-2021.