



March 2021



BIDWELLS

INITIAL HERITAGE ASSESSMENT LAND AT ROXTON

Quality Assurance

Site name: Land at Roxton, Bedfordshire

Client name:

Type of report: Initial Heritage Assessment

Prepared by:

Signed

Date 24 March 2021

Reviewed by:

Signed

Date 25 March 2021



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1.0 Introduction

1.1 This Initial Heritage Assessment has been prepared

in relation to the proposed allocation of the Land at Roxton, hereafter known as the 'site'. The report seeks to identify heritage assets both in and around the site, and to inform design proposals for its potential development.

1.2 The site is an area of approximately 22.26 hectares of land. It is located to the south west of the Black Cat Roundabout on the A1 and to the north of the village of Roxton. The Bedford Road forms the western boundary of the site with the A1 forming the eastern boundary. The majority of the site is currently in arable use, however, there is also a garden centre in the north-west of the site.

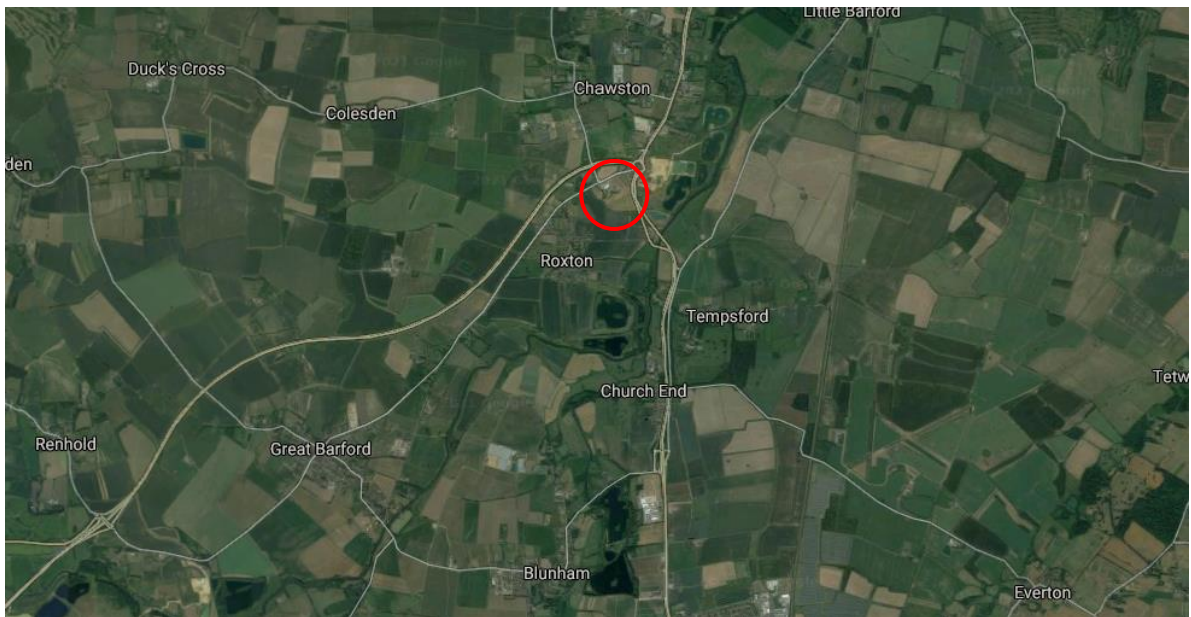


Figure 1 - indicative site location (Google maps)

1.3 The purpose of this report is to assess the effects of potential development of the site in relation to the significance or setting of the identified heritage assets. This approach to assessment is in accordance with Paragraph 189 of the NPPF, ensuring that consideration of the site for development has had due regard for such effects. It also confirms with the advice provided in Historic England's Advice Note 3 The Historic Environment and Site Allocations in Local Plans.

1.4 This document has been prepared by Daniele Haynes BA(Hons) MSc (Senior Heritage Consultant) and reviewed by Kate Hannelly-Brown MSc BSc (Hons) IHBC (Associate, Heritage & Design).

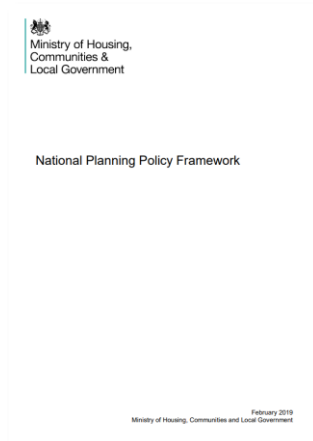
2.0 Heritage Legislation, Policy and Guidance Summary

Planning (Listed Buildings & Conservation Areas) Act 1990

- 2.1 The primary legislation relating to Listed Buildings and Conservation Areas is set out in the Planning (Listed Buildings & Conservation Areas) Act 1990.
- Section 16(2) states *“In considering whether to grant listed building consent for any works the local planning authority or the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.”*
 - Section 66(1) reads: *“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 features of special architectural or historic interest which it possesses.”*
 - In relation to development within Conservation Areas, Section 72(1) reads: *“Special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.”*
- 2.2 With regard to this particular application, the provisions of Section 16(2) and 72(1) do not apply as there are no direct physical works to a listed building and the site is not located within a Conservation Area.

National Planning Policy Framework

- 2.3 The National Planning Policy Framework (NPPF) was published in June 2019, replacing the previously-published 2012 and 2018 Frameworks. With regard to the historic environment, the over-arching aim of the policy remains in line with philosophy of the 2012 framework, namely that *“our historic environments... can better be cherished if their spirit of place thrives, rather than withers.”* The relevant policy is outlined within chapter 16, ‘Conserving and Enhancing the Historic Environment’.
- 2.4 This chapter reasserts that heritage assets can range from sites and buildings of local interest to World Heritage Sites considered to have an Outstanding Universal Value. The NPPF subsequently requires these assets to be conserved in a *“manner appropriate to their significance”* (Paragraph 184).
- 2.5 NPPF directs local planning authorities to require an applicant to “describe the significance of any heritage assets affected, including any contribution made by their setting” and the level of detailed assessment should be *“proportionate to the assets’ importance”* (Paragraph 189).
- 2.6 Paragraph 190 states that the significance any heritage asset that may be affected by a proposal should be identified and assessed. This includes any assets affected by development within their settings. This Significance Assessment should be taken into account when considering the



impact of a proposal, *“to avoid conflict between the heritage asset’s conservation and any aspect of the proposal”*. This paragraph therefore results in the need for an analysis of the impact of a proposed development on the asset’s relative significance, in the form of a Heritage Impact Assessment.

- 2.7 Paragraph 193 requires 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.”*
- 2.8 It is then clarified that any harm to the significance of a designated heritage asset, either through alteration, destruction or development within its setting, should require, *“clear and convincing justification”* (Paragraph 194). This paragraph outlines that substantial harm to Grade II listed heritage assets should be exceptional, rising to *‘wholly exceptional’* for those assets of the highest significance such as scheduled monuments, Grade I and Grade II* listed buildings or registered parks and gardens as well as World Heritage Sites.
- 2.9 In relation to harmful impacts or the loss of significance resulting from a development proposal, Paragraph 195 states the following:
“Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, 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.”*
- 2.10 The NPPF therefore requires a balance to be applied in the context of heritage assets, including the recognition of potential benefits accruing from a development. In the case of proposals which would result in “less than substantial harm”, paragraph 196 provides the following:
“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.”
- 2.11 It is also possible for proposals, where suitably designed, to result in no harm to the significance of heritage assets.
- 2.12 In the case of non-designated heritage assets, Paragraph 197 requires a Local Planning Authority to make a “balanced judgement” having regard to the scale of any harm or loss and the significance of the heritage asset.
- 2.13 The NPPF therefore recognises the need to clearly identify relative significance at an early stage and then to judge the impact of development proposals in that context.

- 2.14 With regard to Conservation Areas and the settings of heritage assets, paragraph 200 requires Local Planning Authorities to look for opportunities for new development, enhancing or better revealing their significance. While it is noted that not all elements of a conservation Area will necessarily contribute to its significance, this paragraph states that *“proposals that preserve those elements of a setting that make a positive contribution to the asset (or better reveal its significance) should be treated favourably.”*

Planning Practice Guidance (PPG)

- 2.15 The Planning Practice Guidance (PPG) was updated on 23 July 2019 and is a companion to the NPPF, replacing a large number of foregoing Circulars and other supplementary guidance.
- 2.16 In relation to non-designated heritage assets, the NPPG explains the following:
“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.”
- 2.17 It goes on to clarify that: “A substantial majority of buildings have little or no heritage significance and thus do not constitute heritage assets. Only a minority have enough heritage significance to merit identification as non-designated heritage assets.”
- 2.18 This statement explains the need to be judicious in the identification of value and the extent to which this should be applied as a material consideration and in accordance with Paragraph 197.

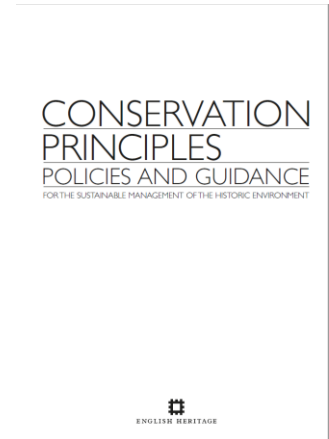
Historic England Analysing Significance in Heritage Assets Advice Note 12 (October 2019)

- 2.19 This document provides guidance on the National Planning Policy Framework requirement for applicants to describe heritage significance in order to aid local planning authorities’ decision making. It reiterates the importance of understanding the significance of heritage assets, in advance of developing proposals. This advice note outlines a staged approach to decision-making in which assessing significance precedes the design and also describes the relationship with archaeological desk-based assessments and field evaluations, as well as with Design and Access Statements.
- 2.20 The advice in this document, in accordance with the NPPF, emphasises that the level of detail in support of applications for planning permission and listed building consent should be no more than is necessary to reach an informed decision, and that activities to conserve the asset(s) need to be proportionate to the significance of the heritage asset(s) affected and the impact on that significance. This advice also addresses how an analysis of heritage significance could be set out before discussing suggested structures for a statement of heritage significance.

Historic England Conservation Principles: Policies and Guidance 2008

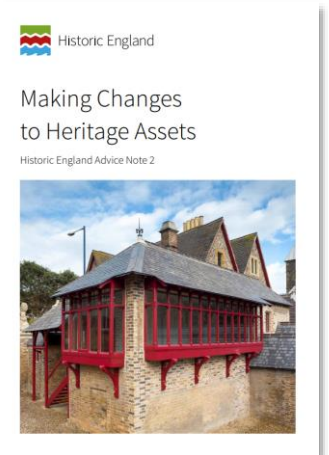
2.21 Historic England sets out in this document a logical approach to making decisions and offering guidance about all aspects of the historic environment, including changes affecting significant places. It states that:

“New work or alteration to a significant place should normally be acceptable if: a. there is sufficient information comprehensively to understand the impacts of the proposal on the significance of the place; b. the proposal would not materially harm the values of the place, which, where appropriate, would be reinforced or further revealed; c. the proposals aspire to a quality of design and execution which may be valued now and in the future; d. the long-term consequences of the proposals can, from experience, be demonstrated to be benign, or the proposals are designed not to prejudice alternative solutions in the future” (page 59).



Historic England Making Changes to Heritage Assets Advice Note 2 (February 2016)

2.22 This advice note provides information on repair, restoration, addition and alteration works to heritage assets. It advises that *"The main issues to consider in proposals for additions to heritage assets, including new development in conservation areas, aside from NPPF requirements such as social and economic activity and sustainability, are proportion, height, massing, bulk, use of materials, durability and adaptability, use, enclosure, relationship with adjacent assets and definition of spaces and streets, alignment, active frontages, permeability and treatment of setting."* (page 10)



Historic England Managing Significance in Decision Taking in the Historic Environment Historic Environment Good Practice Advice (GPA) in Planning Note 2 (March 2015)

2.23 This advice note sets out clear information to assist all relevant stake holders in implementing historic environment policy in the National Planning Policy Framework (NPPF) and the related guidance given in the Planning Practice Guidance (PPG). These include: *“assessing the significance of heritage assets, using appropriate expertise, historic environment records, recording and furthering understanding, neglect and unauthorised works, marketing and design and distinctiveness.”* (page 1)

Historic England The Setting of Heritage Assets Historic Environment Good Practice Advice (GPA) in Planning Note 3 (Second Edition) (December 2017)

2.24 This document presents guidance on managing change within the settings of heritage assets, including archaeological remains and historic buildings, sites, areas and landscapes. Page 6, entitled: ‘A staged approach to proportionate decision taking’ provides detailed advice on assessing the implications of development proposals and recommends the following broad approach to assessment, undertaken as a series of steps that apply equally to complex or more straightforward cases:

- Step 1: Identify which heritage assets and their settings are affected
- Step 2: Assess 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
- Step 3: Assess the effects of the proposed development, whether beneficial or harmful, on the significance or on the ability to appreciate it
- Step 4: Explore ways to maximise enhancement and avoid or minimise harm
- Step 5: Make and document the decision and monitor outcomes



Local Policy

2.25 Bedford Borough Local Plan 2030

2.26 Bedford Borough Local Plan outlines the Council's plan for the extent of growth within the borough and where development should take place until 2030. The document was formally adopted by the Council on the 15th January 2020. The following policies are considered to be of relevance:

2.27 Policy 29 – Design quality and principles

“All new development should:

- i. Be of the highest design quality and contribute positively to the area's character and identity, and*
- ii. Respect the context within which it will sit and the opportunities to enhance the character and quality of the area and local distinctiveness, and*
- iii. Protect and where appropriate, enhance heritage assets and their settings and successfully integrate with the historic environment and character, ...”*

2.28 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, 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.

2.29 Policy 72S – Additional strategic employment development

“Proposals for new “B” use class development on sites of 5 ha and above, not previously allocated for such a use will be supported subject to meeting all of the following criteria:

- ...vi. *Appropriate mitigation of any landscape biodiversity (species or habitats) or heritage impact can be achieved in order to provide a development which respects its surroundings, provides sufficient landscaping/green infrastructure and accords with Policy 41S.”*

3.0 Methodology

Heritage Assets

- 3.1 A heritage asset is defined within the National Planning Policy Framework as “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. It includes designated heritage assets and assets identified by the local planning authority (including local listing)*” (NPPF Annex 2: Glossary).
- 3.2 To be considered a heritage asset “*an asset must have some meaningful archaeological, architectural, artistic, historical, social or other heritage interest that gives it value to society that transcends its functional utility. Therein lies the fundamental difference between heritage assets and ordinary assets; they stand apart from ordinary assets because of their significance – the summation of all aspects of their heritage interest.*” (*Managing Built Heritage: The Role of Cultural Values and Significance* Stephen Bond and Derek Worthing, 2016.)
- 3.3 ‘Designated’ assets have been identified under the relevant legislation and policy including, but not limited to: World Heritage Sites, Scheduled Monuments, Listed Buildings, and Conservation Areas. ‘Non-designated’ heritage assets are assets which fall below the national criteria for designation.
- 3.4 The absence of a national designation should not be taken to mean that an asset does not hold any heritage interest. The Planning Policy Guidance (PPG) 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.*” (Paragraph: 039 Reference ID: 18a-039-20190723)
- 3.5 The PPG goes on to clarify that “*a substantial majority of buildings have little or no heritage significance and thus do not constitute heritage assets. Only a minority have enough heritage significance to merit identification as non-designated heritage assets.*”

Meaning of Significance

- 3.6 The concept of significance was first expressed within the 1979 Burra Charter (Australia ICOMOS, 1979). This charter has periodically been updated to reflect the development of the theory and practice of cultural heritage management, with the current version having been adopted in 2013. It defines cultural significance as the “*aesthetic, historic, scientific, social or spiritual value for past, present or future generations. Cultural significance is embodied in the place itself, its fabric, setting, use, associations, meanings, records, related places and related objects. Places may have a range of values for different individuals or groups*” (Page 2, Article 1.2)
- 3.7 The NPPF (Annex 2: Glossary) also defines significance as “*the value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological,*

architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting."

- 3.8 Significance can therefore be considered to be formed by “*the collection of values associated with a heritage asset.*” (‘Managing Built Heritage: The Role of Cultural Values and Significance’ Stephen Bond and Derek Worthing, 2016.)

Assessment of Significance/Value

- 3.9 It is important to be proportionate in assessing significance as required in both national policy and guidance as set out in paragraph 189 of NPPF.
- 3.10 The Historic England document ‘Conservation Principles’ states that “*understanding a place and assessing its significance demands the application of a systematic and consistent process, which is appropriate and proportionate in scope and depth to the decision to be made, or the purpose of the assessment.*”
- 3.11 The document goes on to set out a process for assessment of significance, but it does note that not all of the stages highlighted are applicable to all places/ assets.
- Understanding the fabric and evolution of the asset;
 - Identify who values the asset, and why they do so;
 - Relate identified heritage values to the fabric of the asset;
 - Consider the relative importance of those identified values;
 - Consider the contribution of associated objects and collections;
 - Consider the contribution made by setting and context;
 - Compare the place with other assets sharing similar values;
 - Articulate the significance of the asset.
- 3.12 At the core of this assessment is an understanding of the value/significance of a place. There have been numerous attempts to categorise the range of heritage values which contribute to an asset’s significance. Historic England’s ‘*Conservation Principles*’ sets out a grouping of values as follows:

Evidential value – ‘*derives from the potential of a place to yield evidence about past human activity...Physical remains of past human activity are the primary source of evidence about the substance and evolution of places, and of the people and cultures that made them...The ability to understand and interpret the evidence tends to be diminished in proportion to the extent of its removal or replacement.*’ (Page 28)

Aesthetic Value – ‘*Aesthetic values can be the result of the conscious design of a place, including artistic endeavour. Equally, they can be the seemingly fortuitous outcome of the way in which a place has evolved and been used over time. Many places combine these two aspects... Aesthetic values tend to be specific to a time cultural context and appreciation of them is not culturally exclusive.*’ (Pages 30-31)

Historic Value – ‘*derives from the ways in which past people, events and aspects of life can be connected through a place to the present. It tends to be illustrative or associative... Association with a notable family, person, event, or movement gives historical value a particular resonance...The historical value of places depends upon both sound identification and direct experience of fabric or landscape that has survived from the past, but is not as easily diminished*

by change or partial replacement as evidential value. The authenticity of a place indeed often lies in visible evidence of change as a result of people responding to changing circumstances. Historical values are harmed only to the extent that adaptation has obliterated or concealed them, although completeness does tend to strengthen illustrative value'. (Pages 28-30)

Communal Value – *“Commemorative and symbolic values reflect the meanings of a place for those who draw part of their identity from it, or have emotional links to it... Social value is associated with places that people perceive as a source of identity, distinctiveness, social interaction and coherence. Some may be comparatively modest, acquiring communal significance through the passage of time as a result of a collective memory of stories linked to them...They may relate to an activity that is associated with the place, rather than with its physical fabric...Spiritual value is often associated with places sanctified by longstanding veneration or worship, or wild places with few obvious signs of modern life. Their value is generally dependent on the perceived survival of the historic fabric or character of the place, and can be extremely sensitive to modest changes to that character, particularly to the activities that happen there”. (Pages 31-32)*

- 3.13 Value-based assessment should be flexible in its application. It is important not to oversimplify an assessment and to acknowledge when an asset has a multi-layered value base, which is likely to reinforce its significance.

Contribution of setting/context to significance

- 3.14 In addition to the above values, the setting of a heritage asset can also be a fundamental contributor to its significance - although it should be noted that 'setting' itself is not a designation. The value of setting lies in its contribution to the significance of an asset. For example, there may be instances where setting does not contribute to the significance of an asset at all.
- 3.15 Historic England's Conservation Principles defines *setting* as “an established concept that relates to the surroundings in which a place is experienced, its local context, embracing present and past relationships to the adjacent landscape.”
- 3.16 It goes on to state that “*context embraces any relationship between a place and other places. It can be, for example, cultural, intellectual, spatial or functional, so any one place can have a multi-layered context. The range of contextual relationships of a place will normally emerge from an understanding of its origins and evolution. Understanding context is particularly relevant to assessing whether a place has greater value for being part of a larger entity, or sharing characteristics with other places*” (page 39).
- 3.17 In order to understand the role of setting and context to decision-making, it is important to have an understanding of the origins and evolution of an asset, to the extent that this understanding gives rise to significance in the present. Assessment of these values is not based solely on visual considerations but may lie in a deeper understanding of historic use, ownership, change or other cultural influence – all or any of which may have given rise to current circumstances and may hold a greater or lesser extent of significance.
- 3.18 The importance of setting depends entirely on the contribution it makes to the significance of the heritage asset or its appreciation. It is important to note that impacts that may arise to the setting

of an asset do not, necessarily, result in direct or equivalent impacts to the significance of that asset(s).

Assessing Impact

- 3.19 It is evident that the significance/value of any heritage asset(s) requires clear assessment to provide a context for, and to determine the impact of, development proposals. Impact on that value or significance is determined by first considering the sensitivity of the receptors identified which is best expressed by using a hierarchy of value levels.
- 3.20 There are a range of hierarchical systems for presenting the level of significance in use; however, the method chosen for this project is based on the established ‘James Semple Kerr method’ which has been adopted by Historic England, in combination with the impact assessment methodology for heritage assets within the *Design Manual for Roads and Bridges* (DMRB: HA208/13) published by the Highways Agency, Transport Scotland, the Welsh Assembly Government and the department for Regional Development Northern Ireland. This ‘value hierarchy’ has been subject to scrutiny in the UK planning system, including Inquiries, and is the only hierarchy to be published by a government department.
- 3.21 The first stage of our approach is to carry out a thoroughly researched assessment of the significance of the heritage asset, in order to understand its value:

SIGNIFICANCE	EXAMPLES
Very High	World Heritage Sites, Listed Buildings, Scheduled Monuments and Conservation Areas of outstanding quality, or built assets of acknowledged exceptional or international importance, or assets which can contribute to international research objectives. Registered Parks & Gardens, historic landscapes and townscapes of international sensitivity.
High	World Heritage Sites, Listed Buildings, Scheduled Monuments, Conservation Areas and built assets of high quality, or assets which can contribute to international and national research objectives. Registered Parks & Gardens, historic landscapes and townscapes which are highly preserved with excellent coherence, integrity, time-depth, or other critical factor(s).
Good	Listed Buildings, Scheduled Monuments, Conservation Areas and built assets (including locally listed buildings and non-designated assets) with a strong character and integrity which can be shown to have good qualities in their fabric or historical association, or assets which can contribute to national research objectives. Registered Parks & Gardens, historic landscapes and townscapes of good level of interest, quality and importance, or well preserved and exhibiting considerable coherence, integrity time-depth or other critical factor(s).
Medium/ Moderate	Listed Buildings, Scheduled Monuments, Conservation Areas and built assets (including locally listed buildings and non-designated assets) that can be shown to have moderate qualities in their fabric or historical association. Registered Parks & Gardens, historic landscapes and townscapes with reasonable coherence, integrity, time-depth or other critical factor(s).

Low	Listed Buildings, Scheduled Monuments and built assets (including locally listed buildings and non-designated assets) compromised by poor preservation integrity and/or low original level of quality of low survival of contextual associations but with potential to contribute to local research objectives. Registered Parks & Gardens, historic landscapes and townscapes with modest sensitivity or whose sensitivity is limited by poor preservation, historic integrity and/or poor survival of contextual associations.
Negligible	Assets which are of such limited quality in their fabric or historical association that this is not appreciable. Historic landscapes and townscapes of limited sensitivity, historic integrity and/or limited survival of contextual associations.
Neutral/ None	Assets with no surviving cultural heritage interest. Buildings of no architectural or historical note. Landscapes and townscapes with no surviving legibility and/or contextual associations, or with no historic interest.

3.22 Once the value/ significance of an asset has been assessed, the next stage is to determine the assets 'sensitivity to change'. The following table sets out the levels of sensitivity to change, which is based upon the vulnerability of the asset, in part or as a whole, to loss of value through change. Sensitivity to change can be applied to individual elements of a building, or its setting, and may differ across the asset.

3.23 An asset's sensitivity level also relates to its capacity to absorb change, either change affecting the asset itself or change within its setting (remembering that according to Historic England The Setting of Heritage Assets – Planning Note 3, 'change' does not in itself imply harm, and can be neutral, positive or negative in effect).

3.24 Some assets are more robust than others and have a greater capacity for change and therefore, even though substantial changes are proposed, their sensitivity to change or capacity to absorb change may still be assessed as low.

SENSITIVITY	EXPLANATION OF SENSITIVITY
High	High Sensitivity to change occurs where a change may pose a major threat to a specific heritage value of the asset which would lead to substantial or total loss of heritage value.
Moderate	Moderate sensitivity to change occurs where a change may diminish the heritage value of an asset, or the ability to appreciate the heritage value of an asset.
Low	Low sensitivity to change occurs where a change may pose no appreciable threat to the heritage value of an asset.

3.25 Once there is an understanding of the sensitivity an asset holds, the next stage is to assess the 'magnitude' of the impact that any proposed works may have. Impacts may be considered to be adverse, beneficial or neutral in effect and can relate to direct physical impacts, impacts on its

setting, or both. Impact on setting is measured in terms of the effect that the impact has on the significance of the asset itself – rather than setting itself being considered as the asset.

MAGNITUDE OF IMPACT	TYPICAL CRITERIA DESCRIPTORS
Very High	<p>Adverse: Impacts will destroy cultural heritage assets resulting in their total loss or almost complete destruction.</p> <p>Beneficial: The proposals would remove or successfully mitigate existing and significant damaging and discordant impacts on assets; allow for the substantial restoration or enhancement of characteristic features.</p>
High	<p>Adverse: Impacts will damage cultural heritage assets; result in the loss of the asset's quality and integrity; cause severe damage to key characteristic features or elements; almost complete loss of setting and/or context of the asset. The assets integrity or setting is almost wholly destroyed or is severely compromised, such that the resource can no longer be appreciated or understood.</p> <p>Beneficial: The proposals would remove or successfully mitigate existing damaging and discordant impacts on assets; allow for the restoration or enhancement of characteristic features; allow the substantial re-establishment of the integrity, understanding and setting for an area or group of features; halt rapid degradation and/or erosion of the heritage resource, safeguarding substantial elements of the heritage resource.</p>
Medium	<p>Adverse: Moderate impact on the asset, but only partially affecting the integrity; partial loss of, or damage to, key characteristics, features or elements; substantially intrusive into the setting and/or would adversely impact upon the context of the asset; loss of the asset for community appreciation. The assets integrity or setting is damaged but not destroyed so understanding and appreciation is compromised.</p> <p>Beneficial: Benefit to, or partial restoration of, key characteristics, features or elements; improvement of asset quality; degradation of the asset would be halted; the setting and/or context of the asset would be enhanced and understanding and appreciation is substantially improved; the asset would be brought into community use.</p>
Minor/Low	<p>Adverse: Some measurable change in assets quality or vulnerability; minor loss of or alteration to, one (or maybe more) key characteristics, features or elements; change to the setting would not be overly intrusive or overly diminish the context; community use or understanding would be reduced. The assets integrity or setting is damaged but understanding and appreciation would only be diminished not compromised.</p> <p>Beneficial: Minor benefit to, or partial restoration of, one (maybe more) key characteristics, features or elements; some beneficial impact on asset or a stabilisation of negative impacts; slight improvements to the context or setting of the site; community use or understanding and appreciation would be enhanced.</p>
Negligible	Barely discernible change in baseline conditions
Nil	No change in baseline conditions.

Summary

3.26 The aim of this Initial Heritage Appraisal is to provide an early assessment of the heritage assets that may be affected by development on the site and some of the key parameters for that development to take into account aspects of built heritage impact.

4.0 Historic Context

- 4.1 An initial review of available historic maps has been undertaken to assist in the understanding of the site's history. Although such information cannot be considered to be definitive, experience shows that the mapping is often relatively accurate and reliable - particularly the later Ordnance Survey (OS) maps - and taken together with written archival date and physical evidence can help to refine the history of a site.
- 4.2 The earliest written record of Roxton is within the Domesday Survey of 1089, however there is archaeological evidence of earlier human settlement in the area. The village was chiefly an agrarian settlement for much of its history.
- 4.3 The 1882 Ordnance Survey shows the built form of the village predominantly focused upon the High Street. Roxton Park occupies much of the area to the west of the village High Street and Bedford Road. To the east of the High Street, the map shows the school and Church of St Mary Magdalen with open fields beyond. The site forms part of this open field system.

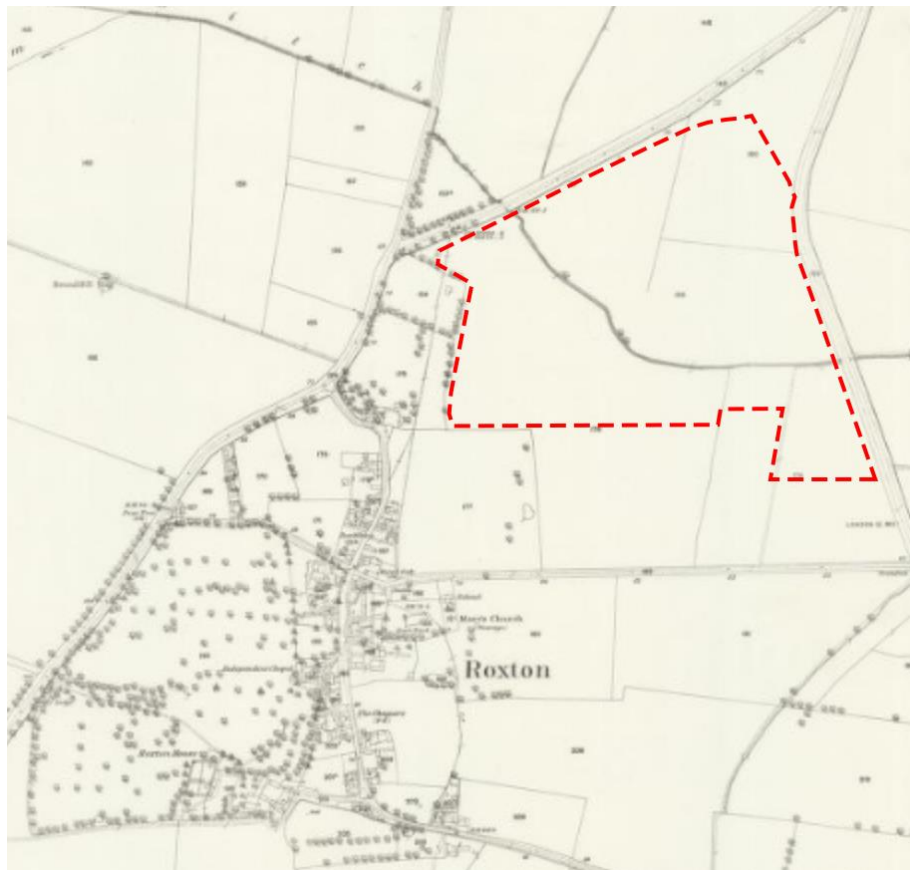


Figure 2 Extract from the 1882 OS Map with the site boundary marked in red

- 4.4 There was little change to the form of the village over the course of the early to mid-20th century.

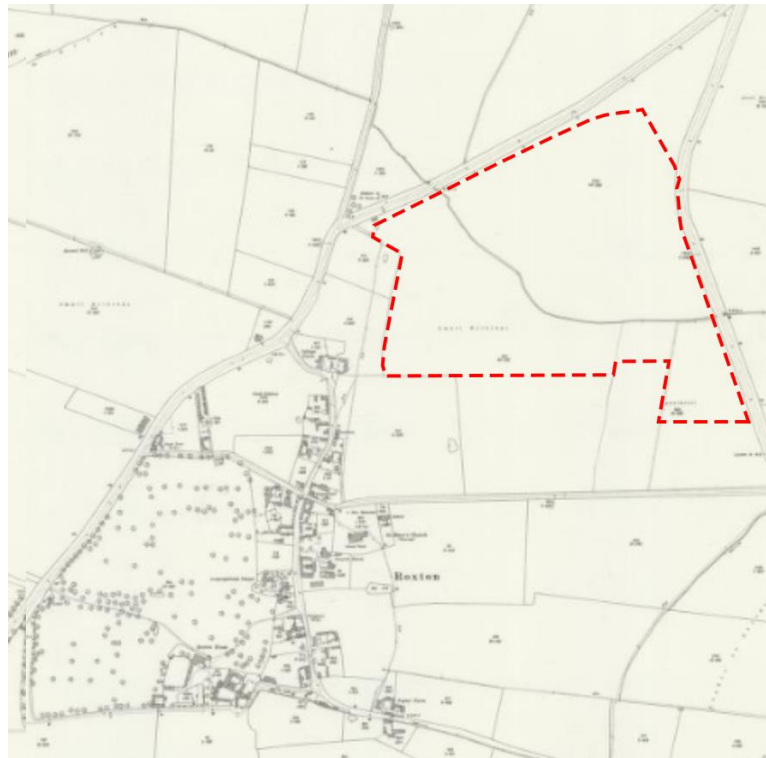


Figure 3 Extract from the 1926 OS Map with the site boundary marked in red

- 4.5 By the 1973 OS Map, the village has expanded with new development in the south-east of the village and in the north-west by Bedford Road. By this date, the Great North Road had been upgraded to form the A1 with the Black Cat Roundabout also visible on this map. On the site, large industrial structures had been erected in the north-west of the site. These buildings were positioned either side of a central access road.

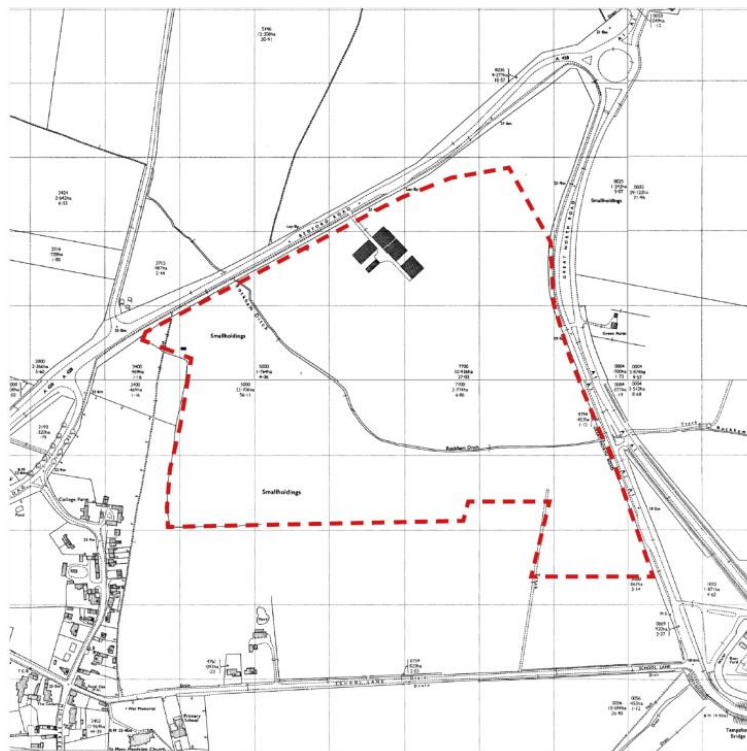


Figure 4 - 1970-1973 OS map

5.0 Heritage Assets

- 5.1 This section identifies heritage assets which surround the site. In this case, the following heritage assets are local to the proposed development and have been identified as they may be affected by future development on the site. The identification of these assets is consistent with ‘**Step 1**’ of the GPA3 The Setting of Heritage Assets.
- 5.2 Although there are a number of assets within the local surrounding area, the location and significance of many of them results in them having no perceptible individual relationship with the proposed site. For this reason, only the heritage assets which may be considered to be affected by future development have been identified.
- 5.3 From an initial review, it is apparent that the site does contribute, to varying extents and in separate parts, to the setting of a number of heritage assets. In some cases, the site forms part of an ‘immediate’ setting, whilst in other cases, the site forms part of what may be termed an ‘extended’ setting; or in other words, a more distant connection. In the case of this site, the following heritage assets may be affected by the development of the proposed site:
1. Roxton Conservation Area;
 2. College Farmhouse – Grade II Listed Building;
 3. Parish Church of St Mary Magdalen – Grade II* Listed Building.



Figure 5 Aerial showing the location of the assets discussed within this report

- 5.4 As identified above, there are a number of other assets which have the potential to be affected by proposed development within the site, depending on the scale, location and massing of any such proposal.
- 5.5 All relevant Statutory List descriptions can be found in **Appendix 1**. Any buildings or structures considered to fall within the curtilage of the above listed buildings would be considered to form part of the listed building and impacts would be assessed accordingly.

6.0 Initial Significance Assessment

- 6.1 The relative significance of the individual assets and the contribution made by their setting is set out below. This assessment also includes a consideration of how the existing site in its current form contributes to this setting, in what way and to what degree.

Roxton Conservation Area

- 6.2 For the purposes of assessment, where we consider the Roxton Conservation Area, we are considering the Conservation Area as a term of designation but also with reference to the built assets which it contains; in other words, we assess the Conservation Area as a grouping of buildings and spaces and the manner in which these relate to their surroundings. Thus, consideration of effects on the setting of a Conservation Area also takes into account potential effects on the setting of built assets within that designated area.
- 6.3 The Roxton Conservation Area was first designated in December 1971 and subsequently revised in August 2003. There is no published Character Appraisal for the Conservation Area. The designation focuses upon the historic core of the village extending from College Farm in the north to Ford Lane in the south incorporating Roxton House in the west and the Church of St Mary Magdalen in the east.
- 6.4 The built form within the Conservation Area is of a domestic scale and is predominantly in residential use, although there are also some buildings which have a more agricultural aesthetic. The buildings themselves are a range of ages and styles and are positioned within irregular plots creating a varied streetscape and building line. A number of the properties within the village are statutorily listed at Grade II, whilst the Congregational Chapel and the Church of St Mary Magdalen are Grade II*
- 6.5 The Conservation Area is linear in form following the narrow, meandering route of the High Street. The designation has a very enclosed character, particularly in the north, where the curves in the road terminate with mature trees or buildings whilst within the plots high boundary treatments or ancillary structures also restrict views out. However, towards the south of the Conservation Area, there are places where the wider area can be glimpsed.
- 6.6 Within the designation, there are three areas of open space, around the churchyard of St Mary Magdalen, Millennium Green and part of Roxton Park, all three of which are bound by fences or boundary walls creating a sense of privacy. The private gardens of the properties also add to the green character of the area.
- 6.7 The Roxton Conservation Area is a fine example of a linear village which retains evidence of its evolution. It is therefore considered to be of a **good** level of significance.

Setting

- 6.8 The setting Conservation Area is formed by various agricultural fields which are bounded by the Bedford Road and A421 in the west, the Black Cat roundabout and associated infrastructure in the north, the A1 in the east and the River Ouse in the east and south.
- 6.9 The enclosed character of the Conservation Area, as well as areas of later development which have been constructed in the south and south-east, result in a lack of a strong visual connection with much of this wider area. Views out across are possible along the periphery of the Conservation Area, however, these views are curtailed by the wider infrastructure which also brings a level of noise and disruption.

- 6.10 As such, it is considered to make a **moderate beneficial** contribution to the designation's significance.

Contribution of the site to setting

- 6.11 The site is located a circa 70m to the east of the Roxton Conservation Area at its closest point. In most instances, there is no direct visual relationship between the site and the Conservation Area; however, there are views from within the private spaces of the northern element as well as views from within the grounds of the Church of St Mary Magdalene. These views are not significantly long in range as they are curtailed by the infrastructure beyond and interrupted by existing built form.
- 6.12 It is considered that the contribution that the site makes to the setting of the Conservation Area ranges in value from **minor beneficial** to **negligible beneficial** to **neutral**. The western element of the site, which holds the most significant intervisibility, is considered to make a **minor beneficial** contribution whilst as one moves eastwards, as the site becomes further visually separated and enclosed by infrastructure, the site makes a **negligible beneficial** contribution. The garden centre and land to the direct east are considered to make a **neutral** contribution.

College Farmhouse – Grade II Listed Building



Figure 6 View of College Farmhouse from the south

- 6.13 College Farmhouse was first added to the Statutory List of Buildings of Special Architectural or Historic Interest on the 13th July 1964 at Grade II.
- 6.14 The building dates to the 16th and 17th centuries and was constructed as a farmhouse. The name “College Farm” is thought to come from the fact that the building and its associated farm was previously owned by an Oxford or Cambridge College. Indeed, Trinity College, Cambridge owned land nearby in the 19th century.
- 6.15 The building is two storeys in height and T-shaped in plan. It is timber framed, with sections of close studding to the cross wing and adjoining main range of the property. The noggings of the building are whitewashed render. The gabled roof is covered with clay tiles and has three red chimney stacks, two end stacks on the north and southern ends and a ridge stack positioned behind the entry lobby. The windows across the building are multi-paned casements and the timber front door into the property is of the 20th century. There are a number of single storey extensions to the structure, constructed in brick.

- 6.16 The building continues to be in use as a private home and, as such, the interior was not assessed for this report.
- 6.17 Overall, College Farmhouse is a fine example of an early farmhouse in Roxton and is therefore considered to hold a **good** level of significance.

Setting

- 6.18 College Farm House is located at the northern end of the High Street with the southern elevation set on the back of the verge ensuring it forms a notable structure in the streetscape. To the west of the property are its private gardens which give the structure a domestic character. To the east of the building is a courtyard with a new-build dwelling to the north east and the associated former farmyard to the east and south-east. The former farmyard has been separated from the farmhouse by a low brick wall and the buildings on the plot are now in residential use, although still have an agricultural aesthetic. Open fields extend beyond the building's immediate setting and within these is a large barn to the north-east of the farmhouse. As such, the setting of College Farmhouse is considered to make a **moderate/good beneficial** contribution to its significance.



Figure 7 View from the north-east toward College Farmhouse

Contribution of the site to setting

- 6.19 The application site boundary is located approximately 100m to the east of College Farmhouse and 250m to the north-east, with a field separating the two. The site forms part of the open field system within which the building is experienced.
- 6.20 The site is considered to make varying levels of contribution to the setting of the building with the western element forming **good beneficial** part of College Farmhouse's setting. As you move east across the site the contribution reduces to **minor/negligible beneficial**, with the north-

eastern element, the garden centre and land beyond, making a **neutral** contribution to the setting of the building.

Parish Church of St Mary Magdalen – Grade II* Listed Building

- 6.21 The Church of St Mary Magdalen was first added to the Statutory List of Buildings of Special Architectural or Historic Interest on the 13th July 1964 at Grade II*.
- 6.22 The Church of St Mary Magdalen is a brown cobblestone building with ashlar dressings and a slate roof. It is thought that the existing building stands on the site of an earlier church with the earliest known incumbent of the village dating to 1235. However, the earliest parts of the existing building are the south aisle, nave and chancel, all of which date to the 14th century. The square west tower dates to the 15th century and is buttressed and battlemented. The vestry dates to the 19th century as does the chancel arch, possibly both created as part of the building's restoration in 1848.



Figure 8 - Church of St Mary Magdalen

- 6.23 Internally, the building is known to have an octagonal column topped with moulded arches. There are also a number of elements surviving from the medieval church such as a 14th century octagonal font, a 15th century chancel screen (restored in 1974) and medieval brasses and effigies.
- 6.24 The building continues to be in use as a place of worship and a centre of the community. As such it can be publicly appreciated both internally and externally.
- 6.25 Overall, the Church of St Mary Magdalen is a good example of a medieval parish church and is therefore considered to hold a **good/high** level of value.

Setting

- 6.26 The immediate setting of the church is formed by its associated churchyard. Within the churchyard are gravestones and mature trees whilst the boundary is defined by hedgerows and trees, all of which gives the building a tranquil and enclosed setting.

- 6.27 The wider setting of the church allows it to be understood as a rural parish church with the village of Roxton to the west and open fields to the east. Views of the church from within the village itself are restricted by the enclosed character of the High Street although glimpses of the tower can be had from the Millennium Gardens. The church tower can also be seen from the surrounding fields, although due to the relatively low scale nature of the building its landmark nature is fairly restricted. There are no views of it across the village from the south and views in the north are filtered through vegetation. ensuring the building forms a landmark in the area.
- 6.28 The immediate setting of the building is therefore considered to make a **good beneficial** contribution to its significance whilst the wider setting is considered to be **moderate/good** beneficial.



Figure 9 View from the churchyard of St Mary Magdalen looking north toward the site

Contribution of the site to setting

- 6.29 The application site is located approximately 280m to the north of the Church of St Mary Magdalen. Although the intervening vegetation and built form to the north and north-west of the church results the visual relationship between the two being limited. The site does, however, form part of its wider setting in which the church is experienced. As such, the site is considered to make a **minor beneficial** contribution to the church's setting although this reduces as you move north and east to **negligible beneficial**. Elements of the site in the north-east including the garden centre and land beyond are considered to make a **neutral** contribution to the setting of the building.
- 6.30 It should be noted that the open field directly to the north of the church, known as "Land north of School Lane", has been allocated for housing development under Policy 27 of the Bedford Local Plan. In addition, an outline application for a development of up to 50 dwellings on the land has been submitted under application 21/00014/MAO. Should this application be approved, and the land be developed, the relationship between the site and the church would be reduced as the church would be separated from its context to the north.

7.0 Impact Considerations

Listed Building Considerations

- 7.1 The statutory duty under Section 66(1) of the Planning (Listed Building and Conservation Areas) Act 1990 sets out that any development should “*have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.*”
- 7.2 ‘Setting’ is defined as the “surroundings in which the asset is experienced”, and a reduction in the ability to appreciate the existing character of this site may result in a reduction in the ability to appreciate the identified listed buildings in a setting which supports their significance.
- 7.3 The contribution which the site makes to the setting of the identified listed building(s) differs depending on its relationship with them. Where possible, development should take the opportunity to provide improvements to settings where possible/relevant.
- 7.4 Therefore, the degree to which a sense of contribution that the site makes to the setting of these assets can be maintained will relate directly to the extent to which the integrity of the setting can be preserved.
- 7.5 If elements of harm are identified as a result of the proposed allocation, in order to accord with the national policy, this potential harm would need to be clearly outweighed by “public benefits” as set out in paragraphs 193-200 of the NPPF.

Conservation Area considerations

- 7.6 The statutory duty under section 72(1) of the Planning (Listed Building and Conservation Areas) Act 1990, with applies to development within Conservation Areas, sets out that special attention shall be paid to “*the desirability of preserving or enhancing the character or appearance of the Conservation Area*”.
- 7.7 In this instance this does apply as the site is not within the Conservation Area boundary. However, when considering the proposed site within the context of the Conservation Area, it is important to consider the historic use and relationship of the site but also views in, out and through the site, and the contribution these make to its setting and overall significance in order to satisfy the requirements of the NPPF paragraphs 193-200.

Non-designated asset considerations

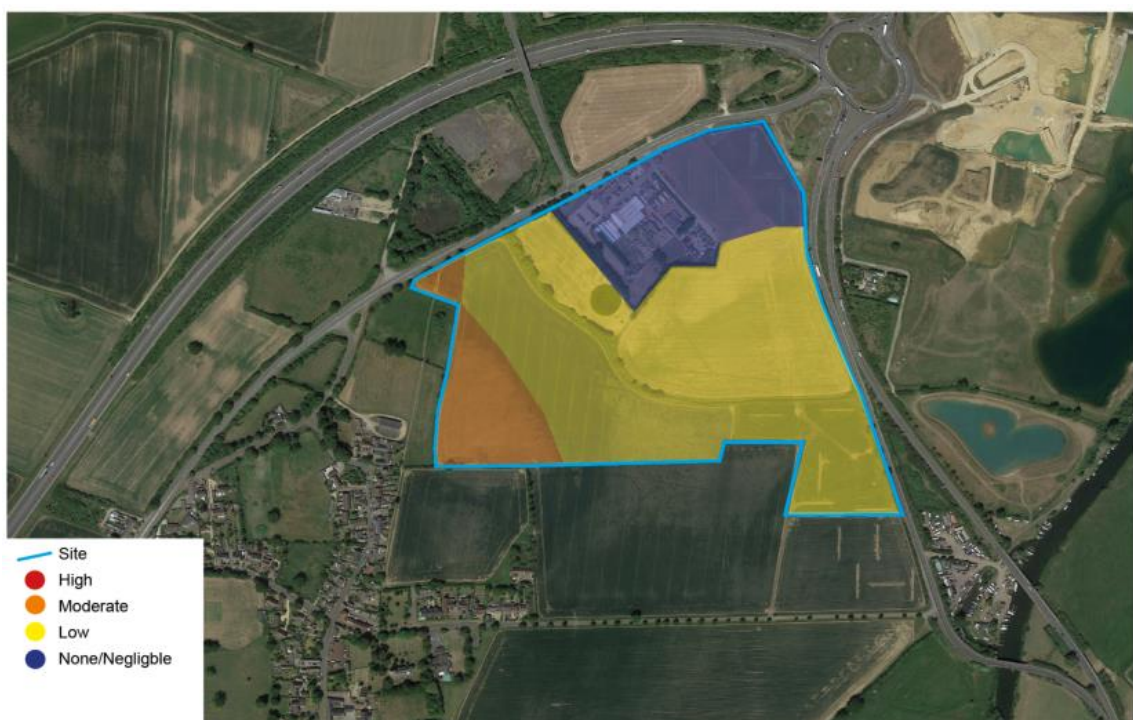
- 7.8 In terms of any non-designated heritage assets identified, paragraph 197 of the National Planning Policy Framework requires a “*balanced judgement*” to be undertaken when considering impact on these assets alongside other material considerations.

8.0 Design Parameters

- 8.1 The following section identifies where proposals for the development should take into account the relevant heritage considerations and how these considerations can be taken forward into the proposed design to minimise impacts and maximise benefits to character and appearance.

Location of development

- 8.2 Development within the site will result in an apparent change within the setting of a number of assets. A reduction in the ability to appreciate the open character of the site may result in a reduction in the ability to appreciate the assets in a setting which supports their significance. However, it is not necessarily the case that the whole site forms an equally significant part of the assets setting. Therefore, the degree to which a sense of openness and existing character can be maintained within the site will relate directly to the extent to which the integrity of the setting can be preserved.
- 8.3 When considering a potential approach to the location of development for the site, the settings of the identified assets will need to be taken in to account. To help with this, a sensitivity map is shown below to highlight the differing levels of sensitivity the site holds, in terms of built heritage considerations.



- 8.4 It is considered that the majority of the site holds areas a low level of sensitivity whilst the western side has been highlighted as being of moderate sensitivity due to its proximity to College Farmhouse and the views of this parcel of the site from Church of St Mary Magdalen. This is not to say these parcels cannot be developed but that the placement, scale, and detailed design will need to be consider the potential impact upon the heritage assets.
- 8.5 The north-eastern element is considered to hold a very low sensitivity due to its partial use as a garden centre, close proximity to the Black Cat roundabout and overall screening provided by the existing vegetation.

Landscape

- 8.6 The importance of landscaping to the context of the assets is essential to the successful development of the site. As a result, the intention should be to retain the effectiveness of landscaping as well as the retention/reinforcement of any existing vegetation on site. This approach will assist in retaining the site's existing contribution to the setting of the adjacent assets and help to screen parcels of development where considered appropriate.
- 8.7 The successful approach of landscaping used to screen development is already demonstrated by the screening provided to the garden centre currently on site.

9.0 Initial Impact Assessment



Figure 10 – Site plan showing primary and emergency vehicular access

9.1 An initial assessment of the potential impact considerations of the proposed development is as follows:

- The partial loss or erosion of the wider open setting of the identified heritage assets which may result in a reduction of the wider rural context; however, this loss can be mitigated through the inclusion of buffers of open space and/or enhanced landscaping across the site, where appropriate, as well as the potential for green corridors through the site to retain a connection to the wider landscape.
- Proposed access points are located to the north, ensuring the site would be read as part of the modern infrastructure to the north.
- Existing vegetation around the existing garden centre

9.2 The extent of the impact on the assets, through change to their settings, reduces as one moves eastwards across the site. The allocation of the site is considered to likely result in a level of harm which would be *'less than substantial'*, it is considered that this harm would be at the lower end of the scale and through careful design moving forward could be further mitigated and potentially eliminated.

10.0 Summary

- 10.1 This Initial Heritage Assessment has been prepared on behalf of Mrs Diane Sharman, Miss Emma Banks, Executors of Phillip Russell deceased, Huntingdon Freeman’s Charity and the Rowanmoor Trustees Limited (British Gardens Centres) in relation to the potential allocation of the site and to assess the likely impacts arising.
- 10.2 It is evident from site assessment that the existing condition of the site contributes to the setting of a number of heritage assets to varying extents.
- 10.3 At this early stage, if masterplanning is informed by the content of this Initial Appraisal and the parameters set, there is potential that impacts would be at the level of “*less than substantial*” harm in terms of the policies of the NPPF – although it is not possible to define any more precisely the levels of impact at this stage until more detail is available. The careful placement, scale and detailed design of the proposed built form, along with a considered landscaping scheme, could ensure this level of harm is mitigated to its lowest level or eliminated altogether.
- 10.4 It would be our intention to continue to advise the design team through the development of the scheme to ensure that the principles laid out in this document are fully considered and developed in forward masterplanning and detailed design, to enable impacts on built heritage assets to be minimised where possible.
- 10.5 The result of this iterative and informed design approach will be that the aspects of heritage impact will be fully addressed through the design process, with the intention to ensure that the provisions of the relevant legislation are satisfied, and that National and Local Policies are adhered to.

APPENDIX 1

STATUTORY LIST DESCRIPTIONS



BIDWELLS