



Allocation Site: 687 Wyboston Lakes Wyboston Bedfordshire

Heritage Appraisal



Report prepared for: Bedford Borough Council

CA Project: MK0614

CA Report: MK0614_687

January 2022



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1. INTRODUCTION

- 1.1. In December 2021, Cotswold Archaeology was commissioned by Bedford Borough Council to undertake a Heritage Appraisal in respect of land at Wyboston Lakes (hereafter referred to as 'the Site'). The Site comprises a broadly rectilinear plot occupied by commercial buildings and agricultural land, measuring c. 40ha in extent (NGR: TL 16862 57537; Fig. 1). The Site is located within the southern fringes of Eaton Socon and it is bounded to the east by the lakes associated with Wyboston Lakes, to the south by lakes and agricultural land, to the north by the route of the A428 and to the west by the route of the A1.
- 1.2. This appraisal has been commissioned to provide information with regard to potential heritage sensitivities and archaeological potential and significance in respect of allocation of this land for development. The proposed allocation type for this Site is mixed comprising residential and commercial (employment) development.

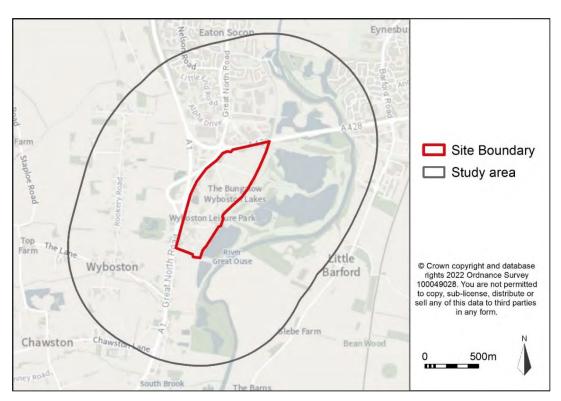


Fig. 1 Site location

Aims

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

the heritage resource within the Site itself, although the resource within the wider landscape is considered where appropriate (within a 1km study area) to more fully understand the archaeological potential and possible constraints within the Site.

- 1.4. Designated heritage assets within the environs of the Site were also considered to the extent to which their significance may be affected by development within their settings.
- 1.5. The objectives of the appraisal are:
 - To summarise recorded heritage assets within the Site and in its environs;
 - To summarise the potential significance of known or potential buried archaeological remains within the Site boundary;
 - To summarise potential built heritage assets within the Site; and
 - To identify any designated heritage assets that may be considered as sensitive receptors to development within the Site, including Conservation Areas and nearby Listed Buildings.

Methodology

- 1.6. The main repositories of information consulted in the preparation of this appraisal comprised:
 - Historic England's National Heritage List (NHLE) for information about designated heritage assets, including Listed Buildings and Scheduled Monuments:
 - Bedford Historic Environment Record for known heritage assets and previous archaeological works;
 - Previous archaeological reports and assessments;
 - Other online sources, including British Geological Survey (BGS) Geology of Britain Viewer, aerial imagery and historic mapping; and
 - A site visit, which took place in January 2022 to undertake an appraisal of the buildings within the Site and designated heritage assets in the vicinity.
- 1.7. Known and potential heritage assets within the Site and its surroundings (based on a 1km study area) are discussed in Section 2 (for archaeological remains) and Section 3 (for built heritage assets within the Site and in its environs). Heritage assets are referred to in the text by a unique reference number (1, 2, etc.) keyed to the figures. A gazetteer of all assets has been compiled and is presented as Appendix 2.

A bibliography of sources consulted has been included in the References section of this appraisal.

Limitations

- 1.8. This appraisal is a desk-based study and has utilised information derived from a variety of online sources, and informed by a site visit. While the level of detail included within the appraisal provides an overview of the heritage resource and constraints within the Site, any planning applications would need to be accompanied by a full desk-based heritage assessment, in line with the relevant guidance (CIfA 2020).
- 1.9. A walkover survey was conducted within the Site by Rose Karpinski on 18th January 2022, which was undertaken in dry and clear weather conditions. Access was afforded within the Site, although such observations are limited since archaeological remains can survive below-ground with no visible surface indications of their presence. It is possible that unknown archaeological remains may be present within the Site, and the presence of modern infrastructure may possibly have inhibited identification of any possible upstanding remains. There was also sufficient access to heritage assets to assess likely impacts upon the significance of the assets due to changes to their setting.

2. SUMMARY OF ARCHAEOLOGICAL RESOURCE

Landscape context

- 2.1. The Site is located to *c.* 560m to the north-east of Wyboston and on the southern fringes of Eaton Socon. The River Great Ouse lies *c.* 175m to the east of the Site at its nearest extent and lakes associated with the Wyboston Leisure Park also lie to the east of the Site. The Site lies within the river valley of the Great Ouse and lies at *c.* 18m above Ordnance Datum (AOD) within the north-western extent of the Site and slopes down to *c.* 15m AOD within its eastern extent.
- 2.2. The bedrock geology of the Site comprises Peterborough Member (mudstone). This bedrock formed in the Jurassic Period, 164 166 million years ago, when the local environment was dominated by shallow seas (British Geological Survey 2022). The superficial geology of the Site comprises river terrace deposits of gravel and sand, which formed up to 3 million years ago when the local environment was dominated by rivers. To the east of the Site is the alluvium of the River Great Ouse, which formed during the formation of the river up to 2 million years ago (Fig. 2).

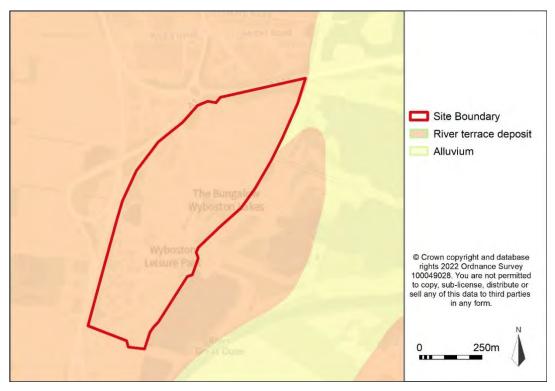


Fig. 2 Superficial geology

2.3. Ground investigation works were carried out within the northern extent of the Site in 2020 by Applied Geology (2020). The investigation included four boreholes to a depth of 8.2m to 10.2m below ground level (bgl) and nine trial pits to a depth of 1.8m and

3.0m bgl. The results of the investigation identified topsoil and made ground to a depth that varied between 0.2m and 2.3m bgl. River terrace deposits were encountered at 1.8m bgl and in some areas were identified at ground level. This was followed by Oadby Member from 1.6-2.8m bgl and continued below the depth of investigation.

2.4. The British Geological Survey records borehole surveys in proximity to the Site. The nearest borehole was surveyed *c*. 120m to the west of the Site (Eaton Socon Western By-pass 1-9; TL15NE3/1-I; NGR: 516620, 257750) to a depth of 18.9m (British Geological Survey 2022). The borehole recorded topsoil to a depth of 0.15m bgl, followed by red boulder clay identified as sandy, silty clay with inclusions of stone to a depth of 1.83m bgl. At this depth river terrace gravels were identified to a depth of 3.35m bgl. This deposit was followed by silt and then silty clay to a depth of 4.45m bgl.

Designated heritage assets

2.5. No designated heritage assets are recorded within the Site. The Two Grade II Listed Buildings are located *c.* 85m and *c.* 130m to the north of the Site. Two Grade II Listed Buildings lie *c.* 95m and *c.* 105m to the south of the Site (Fig. 3).

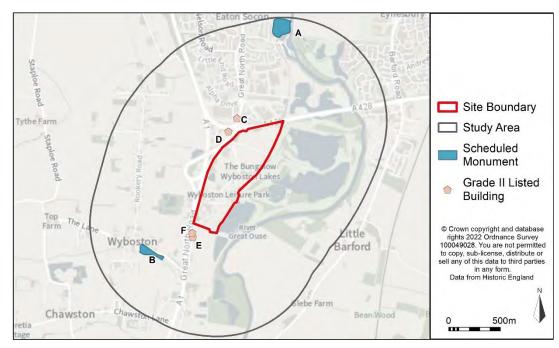


Fig. 3 Designated heritage assets

2.6. Within the wider landscape, further Grade II and II* Listed Buildings have been recorded along with two Scheduled Monuments (Fig. 3). No further designated

heritage assets such as Grade I Listed Buildings, Registered Battlefields or World Heritage Sites are present in the study area.

Previous archaeological investigations

2.7. No archaeological investigations have been recorded within the Site. An archaeological evaluation was carried out in 1997 and 2001 by Wessex Archaeology c. 85m to the north of the site at its nearest point (Wessex Archaeology 1997; 2001). These were followed by an excavation carried out in 2006 (Foundations Archaeology 2006). The investigations identified the remains of a pit dated to the Neolithic period, a multi-phased Roman field system (dated between the 2nd and 4th centuries AD), and the remains of an Anglo-Saxon sunken feature buildings suggestive of settlement activity. The results of relevant investigations are discussed below, as appropriate.

Prehistoric

- 2.8. It is considered rare for remains dated to this period to occur in Bedfordshire and three hand axes found in the study area have been unequivocally dated to the Palaeolithic period (Fig. 4, **Palaeolithic findspot**). No remains dated to the Palaeolithic period have been recorded within the Site. A findspot of an artefacts scatter comparing lithic flakes and animal bone were identified *c*. 70m to the north of the Site (Fig. 4, see **Palaeolithic findspot**). It is incredibly rare to identify both faunal remains and lithic tools together during this period and Wymer (1999, 126) suggests that the lithic artefacts were not necessarily associated with the faunal remains. During the Palaeolithic period, communities would have practiced a non-sedentary hunter-gatherer subsistence strategy and could have ranged far across the region, likely focused along river systems as evidence by the findspot in proximity to the Site.
- 2.9. No artefacts or deposits dated to the Mesolithic period have been recorded within the Site. Within the study area several findspots comprising flint scatters have been identified *c*. 630m to the north-east of the Site (Fig. 4, see **Mesolithic findspot**). No further evidence of Mesolithic activity has been identified in proximity to the Site.
- 2.10. No artefacts or remains dated to the Neolithic period have been recovered from within the Site (cropmarks potentially of prehistoric period within the Site are discussed below), although the landscape is abundant with Neolithic evidence. Approximately 90m to the north of the Site, a Neolithic pit containing a red antler pick and further pits containing struck flints were identified (Fig. 4, 1; Foundations Archaeology 2006). Further north, *c.* 470m and *c.* 810m to the north of the Site, evidence of the remains

of possible Neolithic hearths were identified (Fig. 4, **2a-b**). The evidence comprised shallow ditches filled with burnt stone, and environmental evidence of wood ash. A limited amount of pottery sherds was also identified and dated to the Neolithic period. This evidence suggests an occupation base in the landscape and to the east of the Site there is evidence of ceremonial activity. Approximately 850m to the north-east of the Site are the cropmark remains of a cursus monument (Fig. 4, **3**). Cursus monuments are long, narrow rectangular enclosures formed of a bank with external ditches. The function/use of such monuments is not known, however it is believed they were ceremonial pathways (Darvill 2008, 120). Certainly, this area was used extensively throughout the Neolithic period and it is possible that the course of the river Great Ouse formed an integral part of this prehistoric landscape.

- 2.11. The remains of cremations dated to the Bronze Age were identified *c*. 950m to the north-east of the Site (Fig. 4, 4). Further evidence of possible round barrows have also been identified *c*. 850m to the north-east of the Site (Fig. 4, 5). Further evidence of possible later prehistoric activity has been identified from cropmarks in the landscape (Fig. 4, see **Cropmark**). Cropmarks within the vicinity of the Site suggest further remains of later prehistoric activity. They have been interpreted as evidence of a multi-phased landscape dating between the prehistoric and Roman periods and include possible field systems and enclosures.
- 2.12. Further evidence that attests to later prehistoric activity within the Site's vicinity dates to the Iron Age, although no evidence has been identified within the Site. Postholes dated to the Iron Age have been identified c. 950m to the north-east of the Site (Fig. 4, 8) and suggests the presence of Iron Age activity in the vicinity of the Site. However, much of the evidence of Iron Age activity is also associated within Roman activity (Fig. 4, 6 and 8). Also c. 950m to the north-west of the Site is evidence of Roman agricultural ditches and possible drove-way (track; Fig. 4, 8). Approximately 580m and c. 860m to the south of the Site cropmarks suggestive of possible later Iron Age to Roman enclosures and field systems have been identified (Fig. 4, 6). This evidence of multi-phased activity suggests the landscape was continually occupied from the prehistoric period into the Roman period.

Cropmarks within and in vicinity of the Site

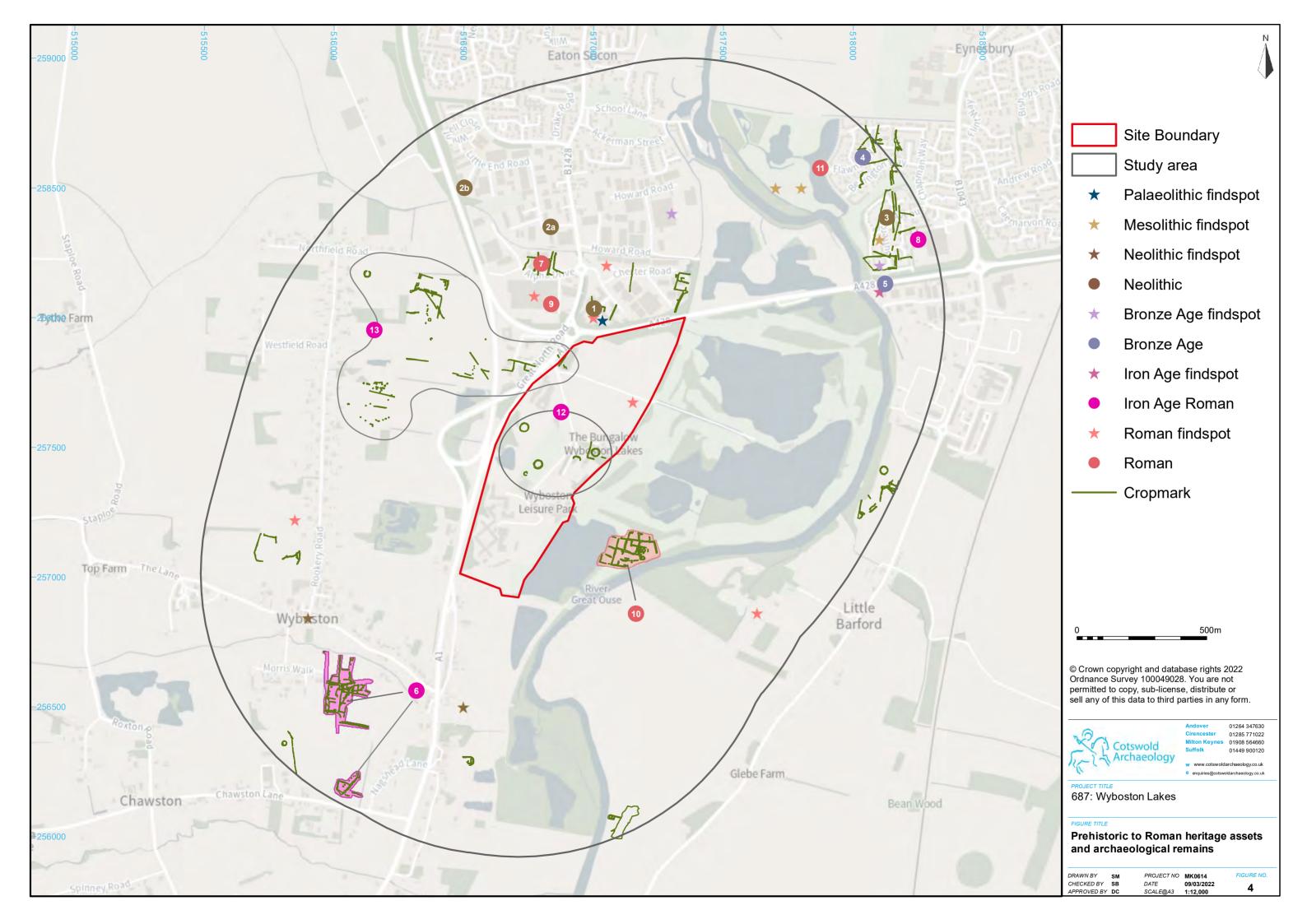
2.13. Cropmarks have been identified within the Site (see Fig. 4, 12). The cropmarks lie within the central extent of the Site and form the remains of possible ring and linear ditches. These cropmarks have been interpreted as the remains of possible barrows

and enclosures. At least three (possibly four) potential barrows have been recorded and measure *c*. 30m in diameter. Barrows can vary widely in diameter from a few metres across to more than 50m in diameter. Barrows were predominately constructed during the Neolithic and Bronze Age periods and can form part of wide ceremonial landscapes. It is also possible that these are the remains of dwellings (round houses) and could be associated with domestic occupation of later prehistoric to Roman date.

- 2.14. The linear cropmarks are suggestive of enclosures, and these have been interpreted as later prehistoric (Iron Age) to Roman in period. As such, it is possible that the Site contains the remains of Bronze Age (or possibly earlier) to Roman activity. However, there is no information to suggest that these cropmarks have been archaeological investigated. Therefore, the interpretation of their origins is speculation at this stage. It should be noted that pottery sherds dated to the Roman period were identified within the north-eastern extent of the Site. Although limited, this does attest to activity during the Roman period (Fig. 4, Roman findspot).
- 2.15. Further cropmarks located along the north-western boundary of the Site and further to the west of the Site have also been interpreted as later prehistoric to Roman in date (Fig. 4, 13). These cropmarks are suggestive of linear ditched features. Some of which are double-ditched and have been interpreted as a boundary ditch or enclosure. A cluster of several discrete cropmark anomalies have also been identified and these rare the remains of possible pits. Further to this a cluster of rectilinear cropmarks are suggestive to be a possible Roman occupation site. Again, no archaeological investigations have been recorded in this locality and as such the interpretation cannot currently be substantiated.

Romano-British

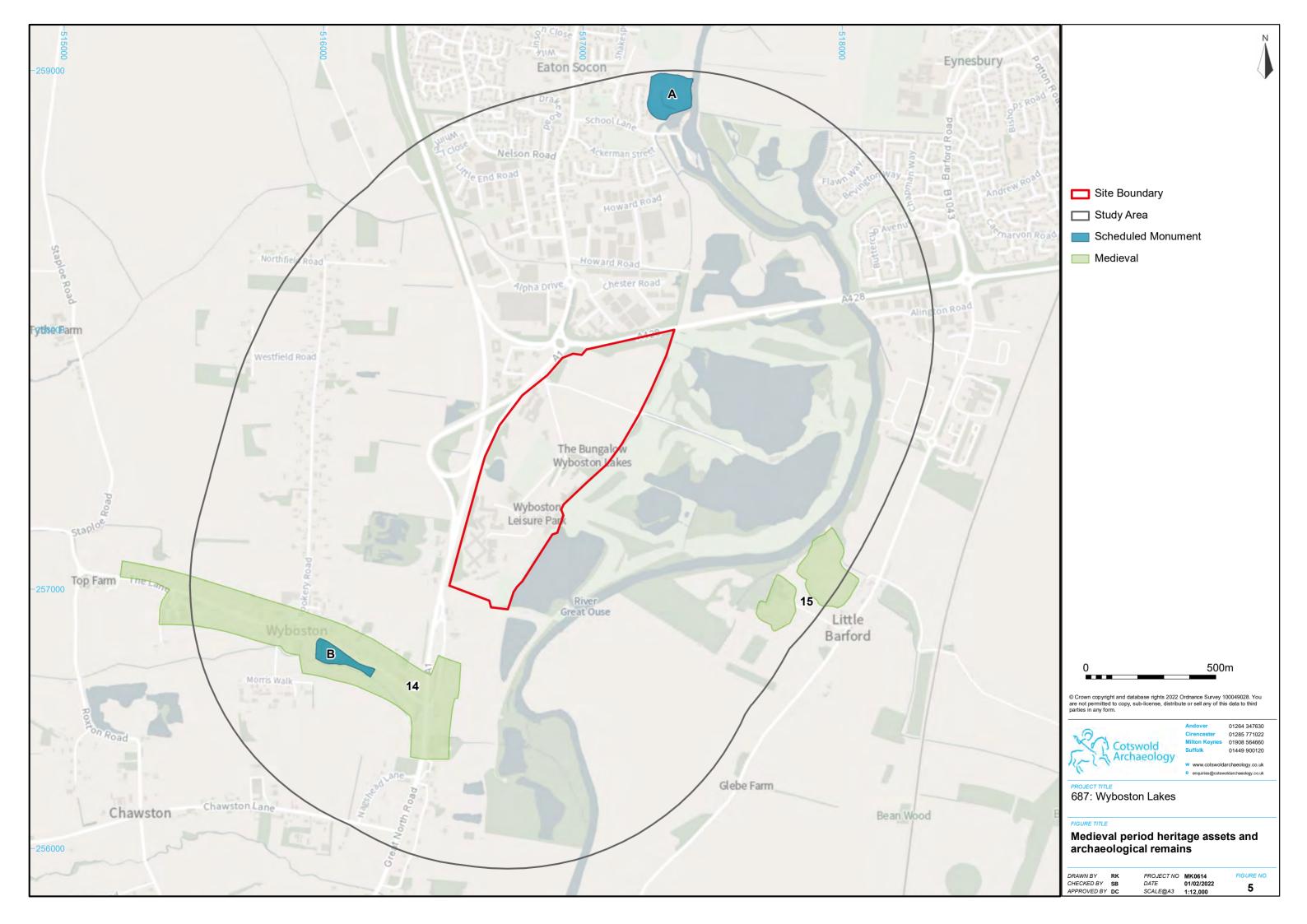
2.16. Evidence of Roman period activity has been observed as cropmark features *c.* 350m north of the Site (Fig. 4, 7). These cropmarks indicate the possible presence of an enclosure Site and surface finds of brooches, coins and jewellery as well as weapons from this area suggest that this was the site of a high status Roman settlement. Evidence of Roman field systems have been observed as cropmark features to the south of this area of likely settlement *c.* 190m north of the Site (Fig. 4, 9). This field system was likely associated with the area of settlement identified provisionally to the north of this.



- 2.17. Evidence of a further high status Roman settlement in the form of a villa has been identified *c.* 800m north-east of the Site (Fig. 4, **11**) here cropmarks have been identified which appear to show a Roman villa with a large courtyard.
- 2.18. A possible Roman farmstead has been identified *c*. 215m south-east of the Site (Fig. 4, 10), this contained evidence of Roman settlement activity including a corn drying oven which suggests the there to have been a farm associated with this settlement.

Early medieval and medieval

- 2.19. The Site lies in the historic parish of Eaton Socon, Wyboston was recorded as a settlement in the Domesday Book of 1086 with a population of 40 households under 6 owners (Powell-Smith 2022). This indicates that there was a substantial medieval period occupation in this area.
- 2.20. Wyboston medieval settlement is thought to have been located *c.* 300m south of the Site (Fig. 5, **14**). This has likely been estimated from historic map sources, a subrectangular moated enclosure (NHLE: 1012076) associated with this settlement has been identified *c.* 500m south-west of the Site (Fig. 5, **B**). This is likely to have been the location of the manor of Wyboston settlement.
- 2.21. A deserted medieval village has been identified c. 800m east of the Site (Fig. 5, 15). This is located across the River Great Ouse from the Site as such it is unlikely that the settlement here held any influence over the land within the Site.
- 2.22. The proximity of the medieval settlement of Wyboston and the deserted medieval village indicates that it is unlikely that the Site was settled during the medieval period. It is likely that it made up part of the agricultural hinterland associated with Wyboston settlement.
- 2.23. The Hillings, Castle Hills: a ringwork castle associated with a Saxon vill, shifted medieval village and a windmill mound is located c. 820m north of the Site (NHLE: 1009629, Fig. 5, **A**). this identified high status medieval period occupation within the study area. However it is not thought that this will have held any influence over activities within the Site.



Post-medieval and modern

- 2.24. Jeffery's 1765 map of Bedfordshire (Fig. 6) shows the Site to be outside of an area of settlement and undeveloped, it is likely that this depicts farmland within the Site.
- 2.25. There is no Tithe map Eaton Socon Parish, as such land use and ownership within the Site during the early post medieval period is unknown. However, it is likely that the field made up part of the agricultural hinterland of the settlement of Eaton Socon.
- 2.26. The First Edition Ordnance Survey Map (Fig. 7) shows the Site to be made up of a number of portions of land, none developed, all appear to be in agricultural use. The Second Edition Ordnance Survey Map (Fig. 8) doesn't depict any changes within the Site, no signs of development are seen, and it appears that the Site remained under agricultural use during this period.

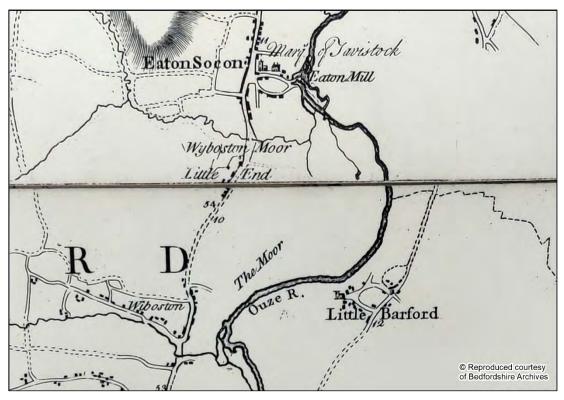


Fig. 6 Extract of Jeffery's 1765 Map of Bedfordshire

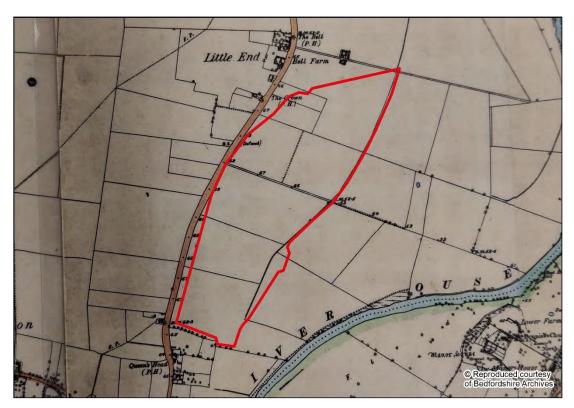


Fig. 7 Extract of the 1st Edition Ordnance Survey Map



Fig. 8 Extract of the 2nd edition Ordnance Survey Map

2.27. At some point in the Site's history it was utilised for quarrying, the result of which can be seen in the Site today with the substantial lake features. In areas of the Site that

have not been subject to quarrying, built forms in the form of conference centres, office space, a spa, restaurants and golf facilities have all been constructed within the Site.

3. BUILT HERITAGE SUMMARY

- 3.1. This section considers receptors that might be affected by development within the Site through the alteration of their setting. At this initial stage, the settings appraisal has been prepared with reference Steps 1 and 2 of the Second Edition of Historic England's 2017 'Good Practice Advice in Planning: Note 3' (GPA3; see Appendix 1).
- 3.2. As part of Step 1, three nearby Listed Buildings have been identified as sensitive to development within their settings, with the potential to impact on their significance as designated heritage assets. These include:
 - The Crown Inn (PH) (NHLE: 1146453, Grade II)
 - 66 and 68 Great North Road (NHLE: 1114929, Grade II)
 - 64 Great North Road (NHLE: 1114928, Grade II)
- 3.3. The initial appraisal has identified that there would be no non-physical impact upon the significance of any other Listed Buildings within the study area, as a result of changes to the use and/or appearance of the Site. The unaffected assets comprise Grade II Listed Bell Farmhouse (NHLE: 1321214, Fig. 3, **C**). Bell Farmhouse is separated from the Site by a major roadway and dense vegetation, there will be no visual impact on Bell Farmhouse by changes within the Site, nor does the Site contribute towards the significance of Bell Farmhouse. Due consideration has been given to the changes that development of the Site would bring about, and it is concluded that development on the Site would not alter or effect the significance of these buildings through alteration to their setting.
- 3.4. The three heritage assets, that have the potential to be affected by future development on the Site, are discussed below.

64 and 66 and 68 Great North Road

- 3.5. The Grade II Listed 66 and 68 Great North Road is a 17th century House built along Great North Road, Grade II Listed 64 Great North Road also 17th century in origin built along Great North Road. These buildings will be assessed together as the key elements of the setting of both buildings is the same and any changes within the Site are likely to have the same impact on both buildings.
- 3.6. 66 and 68 Great North Road's listing description is as follows:

House. C17. Colour washed rough cast over timber frame, ground floor of N wing of colour washed brick. Old clay tile roof. L-plan, one storey and attics. N wing has 2 sashes with glazing bars to ground floor and 2 box dormers, one with 2-light casement one with 2-light horizontal sash. S projecting gable has 2 C20 ground floor casements. Doors to LH and centre of N wing, central one with gabled hood. Rebuilt ridge stack of 3 joined shafts.

Historic England 1983



Photo 1 View of 66 and 68 Great North Road

3.7. 64 Great North Road's listing description is as follows:

House, formerly the Queen's Head public house. C17, refronted C18. Colour washed brick over timber frame, old clay tile roof. 3-room plan, 2 storeys. 3 flush sashes to each floor, all with glazing bars, ground floor ones with cambered heads. C19 4-panel door and moulded surround, in line with rebuilt red brick double ridge stack.

Historic England 1983

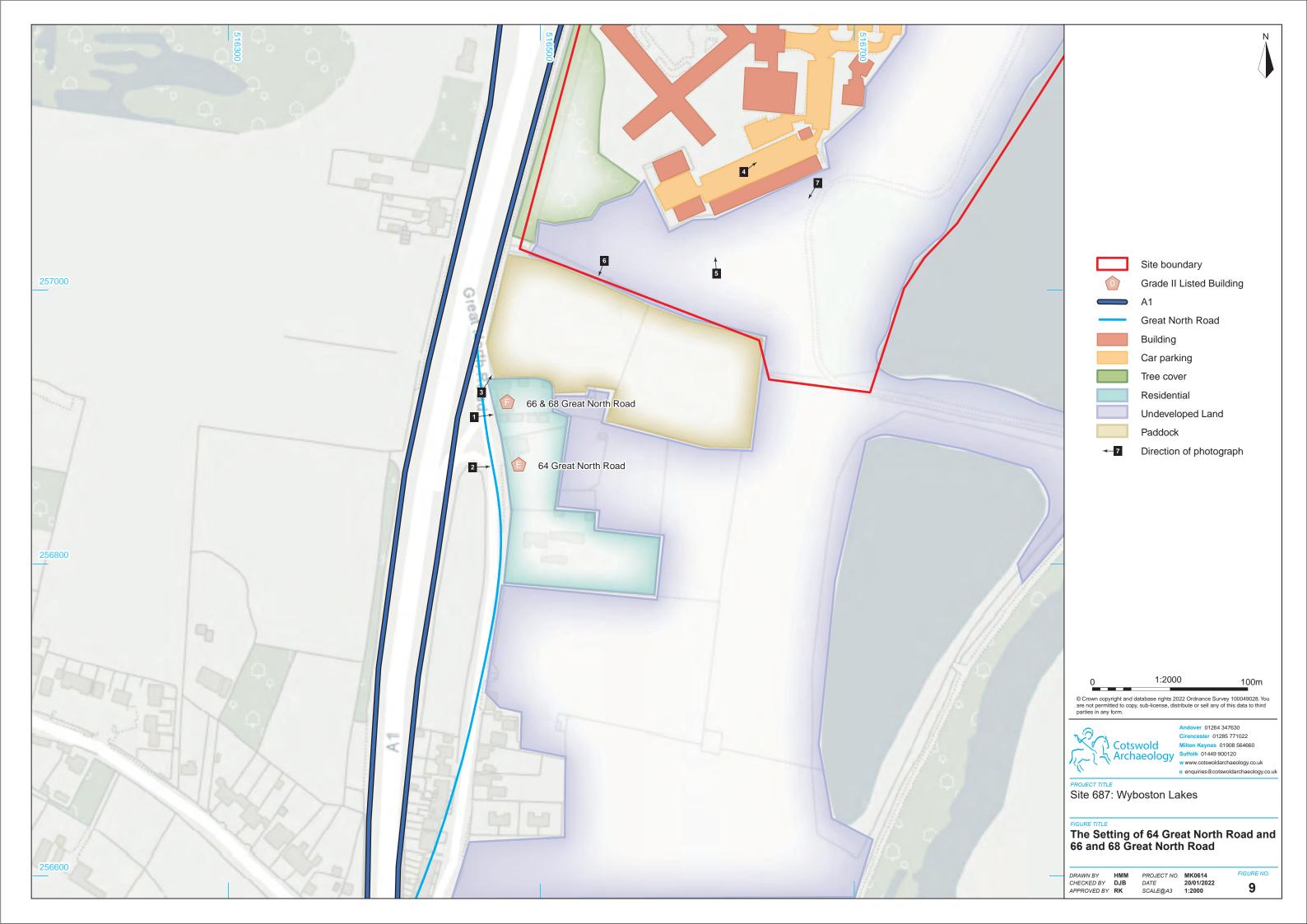




Photo 2 View of 64 Great North Road

- 3.8. The wider setting contributes little to the setting of the Houses, and can be seen as widely negative to the west (Fig. 9). Both buildings derive their significance from their architectural style and historic association with the Great North Road, which they are situated along. 64 Great North Road, is a former pub, which would have served travellers along this key routeway. The buildings association with one another is a positive element of the setting of the each as their contemporary date displays the former character of this road, prior to the construction of the A1 as a major routeway.
- 3.9. These buildings are located *c*. 25m east of the A1, which runs on a north south alignment. This has resulted in both houses being dominated by noise and activity associated with this routeway. To the rear of these buildings lie their gardens, beyond which lies undeveloped land to the River.
- 3.10. To the north of 66 and 68 Great North Road lies an area of paddock, which houses horses. This contributes a positive aspect of the setting of this building, as it is open space which has not been developed.
- 3.11. The Site is located *c.* 85m to the north of 66 and 68 Great North Road, and is separated from the Site by the area of paddock land. Current buildings within the Site are visible across this paddock (Photo 3).
- 3.12. The southern extent of the Site is partially developed with a mix of office buildings and industrial style buildings (Photo 4/5), which are mostly single storey and do not hold much prominence in the landscape. The Site also contains a number of pylons and high voltage power cables run through the Site and are visible from the Listed Buildings (Photo 3).



Photo 3 View towards buildings in the south of the Site from 66 and 68 Great North Road



Photo 4 view of buildings within the Site



Photo 5 View of buildings in the southern extent of the Site

- 3.13. The Houses are visible from the southern boundary of the Site (Photo 6), due to the topography of the Site, the houses are also visible from the undeveloped land in the south of the Site (Fig. 7). This means that any development within the southern extent of the Site would be visible from the upper elevations of both 64 and 66 and 68 Great North Road.
- 3.14. Views towards the Site from the Listed Buildings may change if development were to take place in the southern portion of the Site. This however is not a key view or a view that the buildings derive any historic significance from, as such this change in the wider landscape could not be considered to be harmful.



Photo 6 View of Listed Buildings from the southern boundary of the Site



Photo 7 View of the Listed Buildings from south of the Site

The Crown Inn

3.15. The Crown Inn is a Grade II Listed Building built in the 17th Century, its official listing description is as follows:

Public house. C17 with C19 alterations. Colour washed rough cast over timber frame. Old clay tile roof. 3-room plan, 2 storeys. 3 C19 canted bays to ground floor, 3 2-light casements to first floor, all with leaded lights. Front door in moulded surround with flat cut-bracketed hood. One gable end stack to S, one ridge stack, both brick with colour washed rough cast. Various one and 2-storeyed additions to rear.

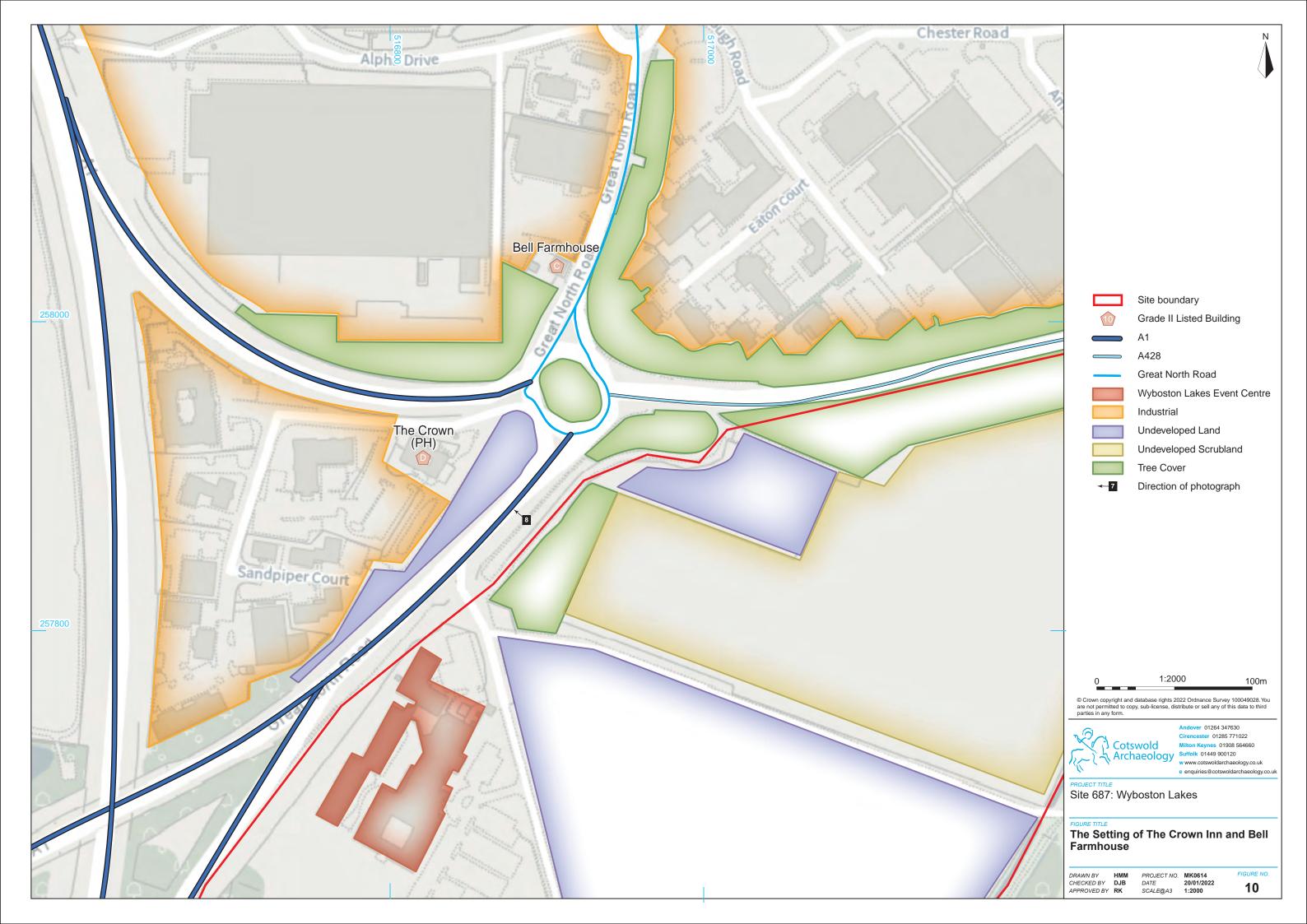
Historic England 1983

3.16. The Crown Inn is located off the A1 (Fig. 10) (Photo 8) and next to a busy junction, this means that the Inn sits in a location with a lot of activity, movement and noise. To the west of the Inn lies land in a mixed industrial use, which is also the characteristic of the land to the north of the Inn. The building does not derive any significance from its wider landscape, which is widely negative.



Photo 8 View of The Crown Inn

- 3.17. The building derives its significance from its historic fabric, architectural style and the longevity of use which it has sustained. The wider setting of the lnn does not add value to the lnn, as it is largely modern in form and the lnn is juxtaposed next to the busy A1.
- 3.18. The Inn was likely a convenient location for travellers along the Great North Road, as it is conveniently placed on the outskirts of St Neots. The continuation of this use



- adds to the communal value of this building, as does its historic association with the Great North Road.
- 3.19. The Site lies *c*. 100m to the east of The Crown Inn. The land within the Site does not contribute towards the significance of the Inn and the land within the Site can be considered to presently represent a neutral aspect of the setting of the Inn.
- 3.20. Changes within the Site, if in the northern extent may be visible from The Crown Inn, however, these changes would be across a major roadway and any views to the Site would be interrupted by this roadway and the streetlighting along it. At present the western edge of the Site nearest to the Inn is surrounded by tree cover, shielding the Site from the A1 and the Crown Inn.
- 3.21. The Site has no known historic association with the Inn, and changes within the Site would not alter the historic significance of the Inn. Nor could changes within the Site create such a significantly more negative aspect of the setting of the Inn than that in which it currently sits.

4. SUMMARY AND RECOMMENDATIONS

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

Archaeological remains

- 4.2. There is the potential for prehistoric to Roman period features to be present within the Site, if these have not been removed through recent more intensive plough damage or the foundations required to construct present the buildings on Site. Indeed, cropmarks located within the central part of the Site suggests some presence of possible later prehistoric to Roman period activity remains within the Site. As their nature, extent and date are can only be anticipated, the significance of the cropmarked features cannot be confirmed. Nevertheless, it is anticipated that they retain some heritage significance.
- 4.3. It is likely that during the medieval and post-medieval period the Site was unoccupied and likely made up part of the rural hinterland of nearby settlements. Any buried archaeological remains associated with this period (and type of activity) would likely be of only limited heritage significance.
- 4.4. The built structures within the Site will have had a limited localised impact on the presence of any archaeological remains. It is likely that archaeological survival outside of areas of built form will be good.
- 4.5. Any development on the Site in future would result in the disturbance to, or loss of, any buried archaeological remains which may be present. Archaeological remains comprise an important, non-renewable and finite resource, and the construction impacts could result in permanent and irreversible loss of, or damage to, any potential buried archaeological remains which may be present within the Site. Any buried archaeological remains within the Site would require consideration as part of the planning process. The requirement for these further investigations (field evaluations) accords with Local Plan Policy 41S (part ii) and paragraph 194 of the NPPF.

Built Heritage

4.6. The Crown Inn is not thought to be susceptible to changes to its significance from changes within the Site as it does not derive its heritage significance from its wider setting.

- 4.7. 64 Great North Road and 66 and 68 Great North Road are not thought to be susceptible to changes in their significance through changes within their wider setting, specifically the Site, so long as changes within the Site are sympathetic to these buildings.
- 4.8. Should development take place in the south of the Site, due consideration to the setting of 64 and 66 and 68 Great North Road will be required. A belt of trees in the southern extent of the Site would shield the houses from development within the Site.

Conclusion

- 4.9. The potential archaeological remains within the Site are likely to retain some evidential value and be of heritage significance. Further investigation of these potential remains, would be required to support a planning application.
- 4.10. Dependent on the scale and form of the proposed development it is not thought that built heritage will be a sensitive to development of this Site. This is due to the Listed Buildings not deriving their significance from the use of the land within the Site.
- 4.11. The historic environment resource within and in the vicinity of the Site will require consideration as part of the planning process if there are proposals in the future for any redevelopment, guided by relevant legislation, planning policy and guidance documents (Appendix 1).

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APPENDIX 1: HERITAGE STATUTE POLICY & GUIDANCE

Heritage Statute: Scheduled Monuments

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

Heritage Statute: Listed Buildings

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

Note on the extent of a Listed Building

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

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

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

Guidance is provided by Historic England on '<u>Listed Buildings and Curtilage: Historic England Advice Note 10</u>' (Historic England 2018).

National heritage policy: the National Planning Policy Framework Heritage assets and heritage significance

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

The July 2019 revision of the Planning Practice Guidance (PPG) expanded on the definition of non-designated heritage assets. It states that 'Non-designated heritage assets are buildings, monuments, sites, places, areas or landscapes identified by plan-making bodies as having a degree of heritage significance meriting consideration in planning decisions, but which do not meet the criteria for designated heritage assets.' It goes on to refer to local/neighbourhood plans, conservation area appraisals/reviews, and importantly, the local Historic Environment Record (HER) as examples of where these assets may be identified, but specifically notes that such identification should be made 'based on sound evidence', with this information 'accessible to the public to provide greater clarity and certainly for developers and decision makers'.

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

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

The setting of heritage assets

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

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

Levels of information to support planning applications

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

Designated heritage assets

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

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

Bedford Borough Local Plan

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

Policy 41S - Historic environment and heritage assets

- i. Where a proposal would affect a heritage asset the applicant will be required to describe:
 - a. The significance of the asset including any contribution made by its setting and impacts of the proposal on this significance, and
 - b. The justification for the proposal, how it seeks to preserve or enhance the asset/setting or where this is not possible, how it seeks to minimise the harm.
- ii. This description must be in the form of one or a combination of: a desk based assessment; heritage statement; heritage impact assessment; and/or archaeological field evaluation. Further information will be requested where applicants have failed to provide assessment proportionate to the significance of the assets affected and sufficient to inform the decision-making process.
- iii. Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset or nondesignated heritage asset of archaeological interest of demonstrably equivalent significance to a scheduled monument, consent will be refused unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:
 - a. the nature of the heritage asset prevents all reasonable uses of the site; and
 - b. no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
 - c. conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and
 - d. the harm or loss is outweighed by the benefit of bringing the site back into use.
- iv. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm will be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

- v. In considering proposals affecting designated heritage assets or a nondesignated heritage asset of archaeological interest of demonstrably equivalent significance to a scheduled monument, involving their alteration, extension, demolition, change of use and/or development in their setting, the Council will include in their consideration as appropriate:
 - a. The asset's archaeological, architectural, artistic and historic interest and any contribution to its significance from setting (including the wider historic landscape)
 - b. scale, form, layout, density, design, quality and type of materials, and architectural detailing
 - c. boundary treatments and means of enclosure
 - d. implications of associated car parking, services and other environmental factors
 - e. effect on streetscape, roofscape and skyline including important views within, into or out of heritage assets
 - f. impact on open space which contributes positively to the character and/or appearance of heritage assets
 - g. the positive benefits of the proposal in addressing heritage at risk.
- vi. Where heritage assets are included on a Local List and are affected by development proposals the Council will afford weight proportionate to their heritage significance in the decision-making process to protect and conserve the significance which underpins their inclusion. Partial or total loss adversely impacting this significance will require clear and convincing justification.
- vii. The effect of proposals on the significance of non-designated heritage assets will be taken into account in determining applications for development. Applications which result in harm or loss of significance to non-designated heritage assets will only be supported if clear and convincing justification has been demonstrated. In making a decision, the Council will weigh the significance of the heritage asset affected against the scale of any harm or loss to it.
- viii. Where applications are permitted which will result in (total or partial) loss to a heritage asset's significance (including where preservation in situ of buried archaeological remains is not necessary or feasible), applicants will be required to arrange for further assessment of and recording of this significance in advance of, and where required, during development/works.

This assessment and recording must be undertaken by a suitably qualified specialist in accordance with a design brief set by the Council's Historic Environment Team. The work might include: - archaeological and/or historic building fieldwork, - post-excavation/recording assessment, analysis, interpretation, - archiving with the local depository, and - presentation to the public of the results and finds in a form to be agreed with the Council.

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

Good Practice Advice 1-3

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

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

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

GPA3 – The Setting of Heritage Assets

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

Step 2 of the settings process 'assess[es] the degree to which these settings and views make a contribution to the significance of the heritage asset(s) or allow significance to be

appreciated', with regard to its physical surrounds; relationship with its surroundings and patterns of use; experiential effects such as noises or smells; and the way views allow the significance of the asset to be appreciated. Step 3 requires 'assessing the effect of the proposed development on the significance of the asset(s)' – specifically to 'assess the effects of the proposed development, whether beneficial or harmful, on the significance or on the ability to appreciate it', with regard to the location and siting of the development, its form and appearance, its permanence, and wider effects.

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

Heritage significance

Discussion of heritage significance within this assessment report makes reference to several key documents. With regard to Listed buildings and Conservation Areas it primarily discusses 'architectural and historic interest', which comprises the special interest for which they are designated.

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

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

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

 Evidential value – the elements of a historic asset that can provide evidence about past human activity, including physical remains, historic fabric, documentary/pictorial records.
 This evidence can provide information on the origin of the asset, what it was used for, and how it changed over time.

- Historical value (illustrative) how a historic asset may illustrate its past life, including changing uses of the asset over time.
- Historical value (associative) how a historic asset may be associated with a notable family, person, event, or moment, including changing uses of the asset over time.
- Aesthetic value the way in which people draw sensory and intellectual stimulation from a historic asset. This may include its form, external appearance, and its setting, and may change over time.
- Communal value the meaning of a historic asset to the people who relate to it. This may
 be a collective experience, or a memory, and can be commemorative or symbolic to
 individuals or groups, such as memorable events, attitudes, and periods of history. This
 includes social values, which relates to the role of the historic asset as a place of social
 interactive, distinctiveness, coherence, economic, or spiritual / religious value.

Effects upon heritage assets

Heritage benefit

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

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

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

Heritage harm to designated heritage assets

The NPPF (2021) does not define what constitutes 'substantial harm'. The High Court of Justice does provide a definition of this level of harm, as set out by Mr Justice Jay in *Bedford Borough Council v SoS for CLG and Nuon UK Ltd*. Paragraph 25 clarifies that, with regard to 'substantial harm': 'Plainly in the context of physical harm, this would apply in the case of demolition or destruction, being a case of total loss. It would also apply to a case of serious

damage to the structure of the building. In the context of non-physical or indirect harm, the yardstick was effectively the same. One was looking for an impact which would have such a serious impact on the significance of the asset that its significance was either vitiated altogether or very much reduced'.

Effects upon non-designated heritage assets

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

APPENDIX 2: GAZETTEER OF SELECTED RECORDED HERITAGE ASSETS

Ref	Description	Grade/Period	NGR	HE ref. Beds HER ref. Cambs HER ref.
Α	The Hillings, Castle Hills: a ringwork castle associated with a Saxon vill, shifted medieval village and a windmill mound	Scheduled Monument	TL 17336 58909	1009629
В	Moated Enclosure and associated building platforms, The Lane, Wyboston	Scheduled Monument	TL 1601 5675	1012076 474
С	Bell Farmhouse	Grade II Listed	TL 1690 5802	1321214
D	The Crown Inn	Grade II Listed	TL 1682 5789	1146453
E	64 Great North Road	Grade II Listed	TL 1648 5687	1114928
F	66 and 68 Great North Road	Grade II Listed	TL 1647 5692	1114929
1	Neolithic pits with artefacts comprising an antler pick and flint implements.	Neolithic	TL 1709 5799	16709
2 (a-b)	Remains of hearths formed of shallow pits containing burnt stone.	Neolithic	TL 1683 5834 TL 1649 5850	00369 28834
3	South cursus, Eynesbury as evidence from cropmarks.	Neolithic	TL 18132 58362	17676
4	Pits and enclosures and the remains of cremations dated to the Bronze Age.	Bronze Age	TL 18067 58594	17704
5	Remains of a ring ditch (possibly a barrow).	Bronze Age	TL 181 581	10198
6	Remains of a enclosures and field systems.	Iron Age – Roman	TL 1603 5655 TL 1605 5619	17147 22312
7	The remains of enclosures and cropmarks suggestive of Roman activity.	Roman	TL 168 581	15202
8	Postholes dated to the Iron Age and evidence of Roman agricultural ditches and possible drove-way.	Iron Age – Roman	TL 18246 58317 TL 18169 58280	15825 17705
9	Evidence of former field systems.	Roman	TL 1684 5805	16505
10	The location of a possible Roman farmstead.	Roman	TL 171 571	476
11	The remains of a possible Roman villa.	Roman	TL 1784 5855	04253

Ref	Description	Grade/Period	NGR	HE ref. Beds HER ref. Cambs HER ref.
12	Cropmarks interpreted as ring ditches and the possible remains of barrows. Linear cropmarks interpreted as enclosures.	Later prehistoric - Roman	TL 168 576	480
13	Cropmarks interpreted as ditched enclosures, and evidence of an occupation focus.	Later prehistoric – Roman		22309 16738 1881 1882 480 629
14	Wyboston Medieval Settlement	Medieval	TL 159 567	17149
15	Deserted Medieval Settlement	Medieval	TL 1775 2694	1806



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