Cotswold Archaeology

Allocation Site: 1246
Greyfriars
Bedford

Heritage Appraisal

Report prepared for:
Bedford Borough Council

CA Project: MK0614

CA Report: MK0614_1246

March 2022

Andover Cirencester Milton Keynes Suffolk

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issue	**2**

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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 Greyfriars, Bedford (hereafter referred to as 'the Site'). The Site comprises four parcels of land. Parcel 1, the smallest part of the Site, is a sub rectangular piece of land occupied by a six storey apartment block and garages, measuring *c*. 0.25ha (NGR: TL 04420 50055, Fig. 1). This is bounded to the east by Greyfriars Road (A600), to the north by Bromham Road, to the west by Conduit Road and to the south by Greyfriars Play Area. The largest part of the Site, Parcel 2, is an irregular piece of land occupied by a car park, measuring *c*. 1.61ha (NGR: TL 04566 49973; Fig. 1). It is bounded to the south and west by Greyfriars Road (A600), to the north by Bromham Road, and to the east by Hassett Street. Parcel 3 is located to the east of Parcel 2, east of Hassett Street, north of Bedford Bus Station, south of Brace Street and west of Allhallows, measuring 0.43 hectares (NGR: TL 04707 49964; Fig. 1). Parcel 4 is located to the south of Bedford Bus Station and Thurlow Street, west of Allhallows east of River Street and north of Midland Road, measuring 0.40 hectares (NGR: 04714 49817). The Site is located 260m west of Bedford High Street.

1.2. This appraisal has been commissioned to provide information on potential heritage and archaeology constraints with respect to consideration of the Site for development allocation.

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 500m study area) to more fully understand the archaeological potential and possible constraints within the Site in response to the brief provided by Bedford Borough Council as part of the invitation to tender.

1.4. Designated heritage assets within the environs of the Site were also considered, and an assessment of the extent to which their significance may potentially be affected by development within their settings was undertaken in accordance with Historic England's Good Practice Advice Note 3: The Setting of Heritage Assets (2017*)* (see Appendix One).

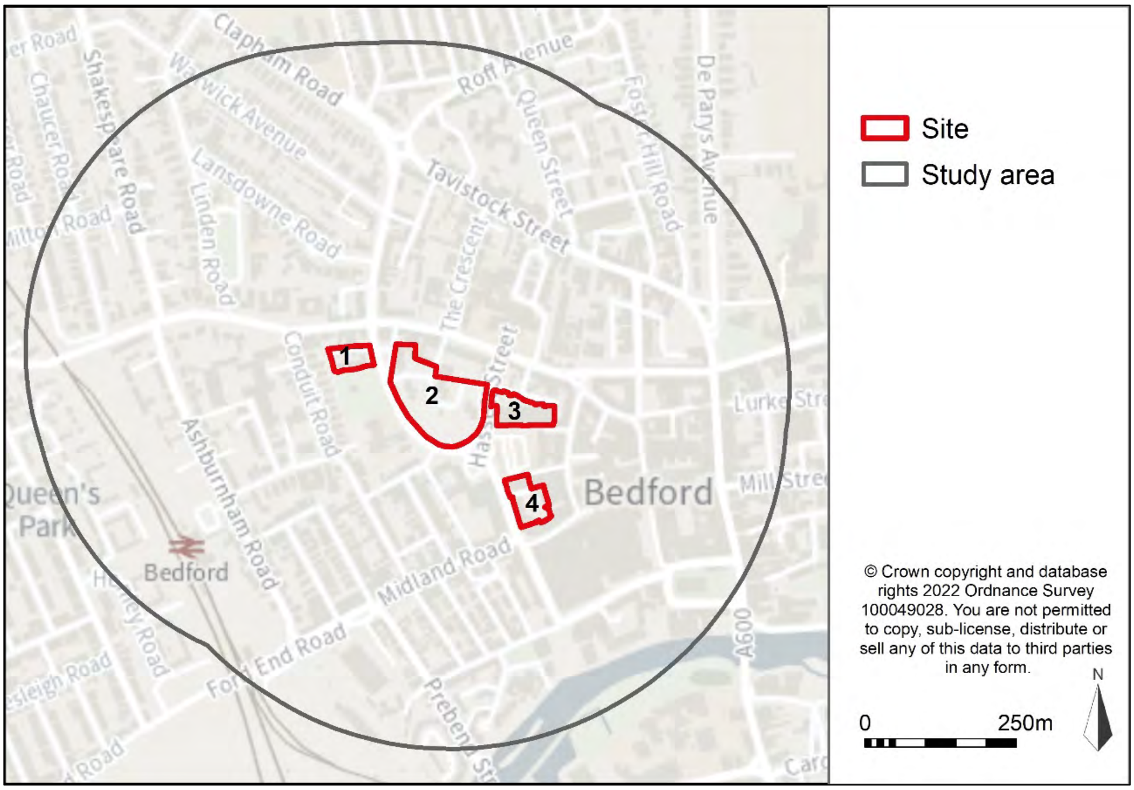


Fig. 1 Site location

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
- Two site visits which took place in January and March 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 500m 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 has been 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. Walkover surveys were conducted within the Site, which were undertaken in January and March 2022 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.

1.10. The 'settings assessment' presented in Section 3 of this report was carried out in accordance with Historic England's Good Practice Advice Note 3: The Setting of Heritage Assets (2017). Steps 1 and 2 of the assessment process (the identification of assets and the understanding of their significance) were undertaken without constraint (except where specific limitations are referenced i.e., where close access is not possible). Where the potential development options are known or at least the broad parameters are available, a specific narrative has been provided on the potential impacts and opportunities to mitigate these impacts (steps 3 and 4 of the assessment). However, where the potential development proposals are not known, more general statements are offered in regard to impacts and mitigation opportunities. In any case, (as discussed in the concluding remarks of this report) further assessment of these matters would be required to support any planning applications at the Site.

2. SUMMARY OF ARCHAEOLOGICAL RESOURCE

Landscape context

2.1. The Site comprises four parcels of land. Parcel 1, the smallest part of the Site, is a sub rectangular piece of land occupied by a six-storey apartment block and garages, measuring c. 0.25ha (NGR: TL 04420 50055, Fig. 1). This is bounded to the east by Greyfriars Road (A600), to the north by Bromham Road, to the west by Conduit Road and to the south by Greyfriars Play Area. The largest part of the Site, Parcel 2, is an irregular piece of land occupied by a surface level car park, measuring c. 1.61ha (NGR: TL 04566 49973; Fig. 1). It is bounded to the south and west by Greyfriars Road (A600), to the north by Bromham Road, and to the east by Hassett Street. Parcel 3 is a multistorey car park with retail units on the ground floor, located to the east of Parcel 2, east of Hassett Street, north of Bedford Bus Station, south of Brace Street and west of Allhallows, measuring 0.43 hectares (NGR: TL 04707 49964; Fig. 1). Parcel 4 is 20th century retail units with residential accommodation above them, is located to the south of Bedford Bus Station and Thurlow Street, west of Allhallows east of River Street and north of Midland Road, measuring 0.40 hectares (NGR: 04714 49817).

2.2. The Site occupies a gentle, south-facing slope, measuring 34m above Ordnance Datum (aOD) in the north, sloping down to 32m aOD in the south. The Site is located 285m north of the current northern bank of the River Great Ouse. The Site is located 260m west of Bedford High Street.

2.3. The British Geological Survey (BGS Online 2021) records the underlying bedrock geology in Parcels 3 and 4 and the southern part Parcel 2 of the Site as Great Oolite Group (Limestone and [subequal/subordinate] Argillaceous Rocks, Interbedded). Parcel 1 and the northern part of Parcel 2 contain Kellaways Clay Member (Mudstone). Both are sedimentary bedrock, formed approximately 164-170 million years ago and 164-166 million years ago respectively in the Jurassic Period, when the local environment was dominated by shallow seas. The Site is also located on gravel terraces comprising Stoke Goldington Member (Sand and Gravel) in the north and Felmersham Member (Sand and Gravel) in the south, formed up to 3 million years ago in the Quaternary Period when the local environment was dominated by rivers. These drift deposits would suggest flooding associated with the River Great Ouse, and were likely formed as the river and any former tributaries cut deeper into the underlying bedrock leaving gravel terraces behind.

2.4. One borehole has been extracted from the south-east of the Site (NGR: TL 04580 49940, BGS Ref: TL04NW8) and records a stratigraphy profile which generally confirms the geology described above.

Designated heritage assets

2.5. No World Heritage Sites, Historic Wrecks or Historic Battlefields are located within the Site or the study area. The closest Scheduled Monument to the Site comprises the 'Remains of the George Inn', a 15th-16th century gateway located 390m south-east of the Site (Fig. 2: **A**).

2.6. Bedford Town Centre Conservation Area intrudes slightly into the northern extent of the Site (Parcel 2), and is located immediately to the north of the remainder of the Site (Fig. 3).

2.7. There are fifty Listed Buildings located within the study area. These include three Grade I Listed Buildings, two Grade II* Listed Buildings and 45 Grade II Listed Buildings. The Grade I Listed Buildings comprise 'St Paul's Church' 440m south-east of the Site (List Entry Number: 1321436, Fig. 2) the 'Statue of John Howard' located 490m south-east of the Site (List Entry Number 1321437, Fig. 2) and 'St Peter's Church' located 430m north-east of the Site (List Entry Number: 1146340, Fig. 2). The two Grade II* Listed Buildings comprise three separate structures at Bedford Modern School and a Public Library (List Entry Numbers: 1138232, 1129009, Fig. 2) located 300m south-east of the Site. The closest Grade II Listed Buildings to the Site comprise '22 & 24 Bromham Road', '26-36 Bromham Road' and '38-48 Bromham Road', which are 19th century houses along the south side of Bromham Road, approximately 40m north of the Site (Fig. 2: **B**).

2.8. Any potential development impacts on the setting and significance of Designated Heritage Assets are considered in Section 3 of this report.

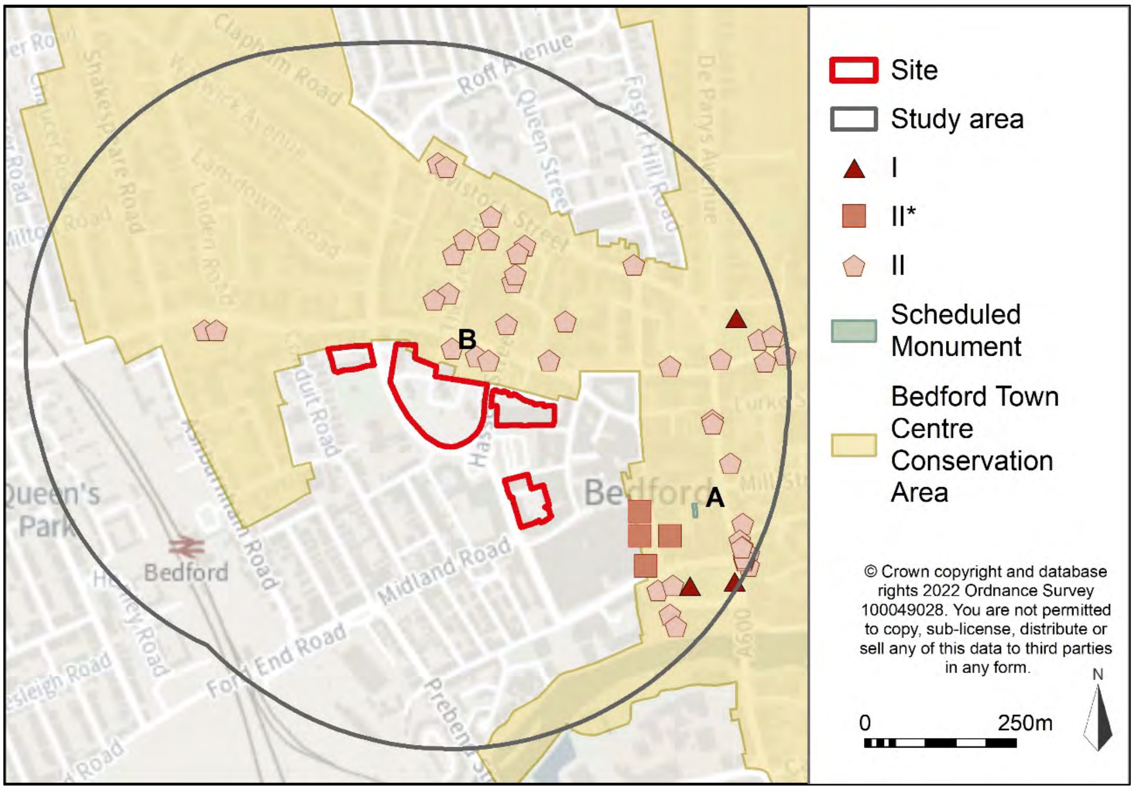


Fig. 2 Designated Heritage Assets

Relevant Archaeological Investigations

2.9. One trial trench evaluation (Fig. 3: **C**) and one watching brief (Fig. 3: **D**) have taken place within the south of Parcel 2 of the Site. One watching brief has also taken place in the vicinity of the Site at Priory Lower School, 25m south of the Site (Fig. 3: **E**). None of these investigations recorded archaeological evidence pre-dating the post-medieval period. An evaluation comprising two trenches took place between Parcels 3 and 4 at Bedford Bus Station in 2014 and identified several cut features (Fig. 3: **F**, Archaeological Solutions 2014). Two of the features contained medieval pottery. The results of these investigations will be discussed below, where relevant.

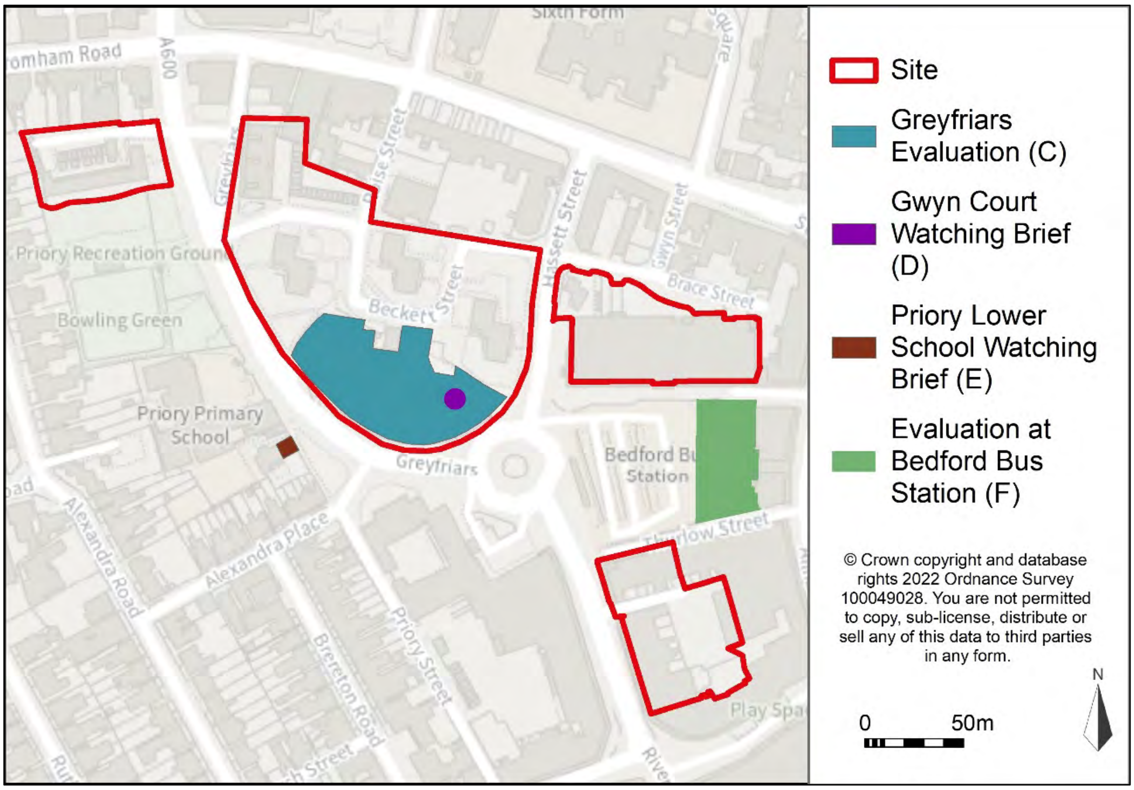
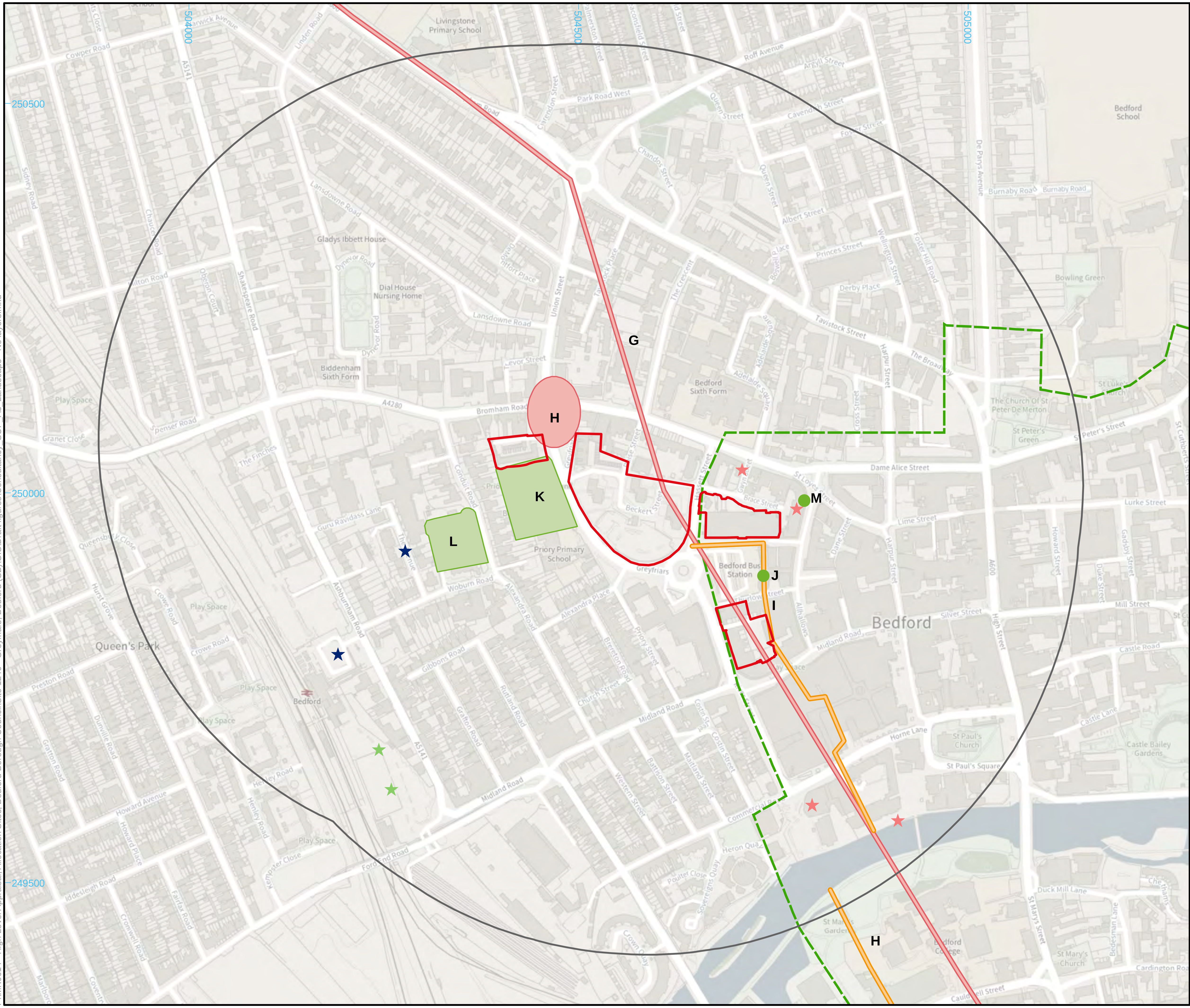


Fig. 3 Relevant archaeological investigations

Prehistoric

2.10. Palaeolithic artefacts are most commonly found as redeposited finds (i.e., not within their original context), comprising lithic (stone) artefacts such as hand axes, cores or flakes; the majority of which have been recovered from river gravel terrace deposits. Findspots of Palaeolithic date have been recorded on these gravel terrace deposits within the study area (Fig. 4). The Site is located on the same gravel terraces and it is possible that further finds dating to this period could be present within these deposits.



N

Site

Study area

Palaeolithic findspot

Roman Road

Roman

Roman findspot

Burh ditches

Extent of medieval Bedford

Medieval

Medieval findspot

0 200m

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PROJECT TITLE
Site 1246 - Greyfriars

FIGURE TITLE
Selected heritage assets

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2.11. No finds or features dating to the Mesolithic, Neolithic, Bronze Age or Iron Age have been identified within the study area, suggesting that this was not a focus point for activity during these periods or that later built form from the medieval to modern periods truncated earlier remains.

Romano-British

2.12. The exact location of the Ickleford (23km south of the Site) to Bedford Roman Road is unknown but if projected from its known route along London Road over the River Ouse, it may have passed through Parcels 2 and 4 on a broadly north-west to south-east alignment (Fig. 4, **G**). A layer of limestone slabs identified 50m south-east of the Site along this projected route in 1958 may be part of this road (Viatores 1964).

2.13. A burnt tile-lined structure containing Roman pottery was identified close to the projected route of the road (Fig. 4, **H**) in the late 19th century. Though the exact location of this feature is not known, it was located close to the junction of Bromham Road and Greyfriars, and therefore likely close to the northern boundary of the Site. The structure probably represents either a hypocaust system associated with occupation or a kiln representing industrial activity. Findspots of Roman pottery and coins have also been recorded close to the projected Roman Road, particularly around Parcel 3 (Fig. 4). This suggests that activity in the area during this period was most likely concentrated around the road.

Early medieval and medieval

2.14. In the late 8th century, King Offa of Mercia (ruled 757-796) established a series of defensive burhs (defensive enclosures) in Mercian England to defend against Viking seaborne attacks, including one at Bedford (Haslam, 1987). These burhs were generally located along main rivers so that the burh and bridge would block access up the rivers. These burhs became centres of administration and focal points for trade activity.

2.15. The first documentary source relating to Bedford is the late 9th century treaty between King Alfred and King Guthrum which established the Danelaw, an area under the jurisdiction of Danish rulers, in England (preserved in 11th century Cambridge Corpus Christi MS 383). In the treaty, the boundary between Alfred's England and Guthrum's Danelaw ran along the River Lea to its source, then up to Bedford and finally along the River Great Ouse to Watling Street, but this boundary did not last long.

2.16. Bedford subsequently became the site of one of Edward the Elder's (ruled 899-924) burhs in 915-916, again part of a strategic network of defensive settlements intended to stop Viking attacks and recapture Danelaw territories. This burh was concentrated around the modern High Street area of Bedford to the north and south of the River Great Ouse, and ditches south of Parcel 3 and east of Parcel 4 preserve the western boundary of the burh (Fig. 4, **I**).

2.17. An evaluation comprising two trenches took place at Bedford Bus Station, between Parcels 3 and 4, in 2014 (Fig. 3: **F**, Archaeological Solutions 2014). The trenches were located in the vicinity of the projected boundary ditch. Trench 1 contained no features of archaeological interest. Trench 2, located within the south of the evaluated area (Fig. 4: **J**), identified a number of linear features on a broad north-west to south-east alignment, comprising two ditches, a pit and a gully. Two of the features (a gully and a pit) contained three sherds of 10th to 12th century pottery between them, but no substantial defensive ditches were identified. The area was heavily truncated by modern development, and both trenches were waterlogged. Though the evaluation did not identify the Saffron Ditch, due to the limited nature of the evaluation (only two trenches on a north-south alignment) it is possible that the ditch is still located in the near vicinity. Scatters of residual early medieval pottery have been recorded immediately west of purported location of these ditches (not mapped), but no features of this date have been identified west of the anticipated boundary which confirms that this is likely to delineate the rough extent of activity at Bedford during this period.

2.18. In the Domesday Book of 1086, Bedford had no recorded population which is sometimes the case for large towns, and three churches (OpenDomesday 2022). This suggests that a substantial settlement had formed by this time.

2.19. Greyfriars Friary was a house of Franciscan Friars located on the modern Greyfriars Road (Fig. 4, **K**). Originally founded in 1238, it was dissolved in 1538 but the West range continued to be used as a domestic dwelling until it was demolished in 1899. A deed of 1539-40 granted the Friary to John Gostwyk, and mentions a church, belfry and burial ground at the Greyfriars. John Speed's map of Bedford in 1610 (not reproduced) shows a range of buildings around three sides of a courtyard with a tower in the middle of the north range and a wall running north towards an arched gate on Bromham Road. Parcels 1 and 2 lay within the grounds of the Friary.

2.20. A medieval moated enclosure can be seen on historic aerial photographs and maps, lying 65m south-west of the Site (Fig. 4: **L**). Whilst most of the moat has been destroyed by modern development the southern side remains extant. The function of the moat is unknown, but it may have been agricultural and/or associated with Greyfriars Friary, which was located 40m to the east. All Hallows Church, historically located 140m east of the Site and demolished in the 17th century, also had medieval origins (Fig. 4, **M**).

2.21. The town of Bedford is depicted on the Gough Map of Great Britain, which is believed to date to the second half of the 14th century. This demonstrates that the town was considered large and significant enough to warrant depicting at this time. However, the Speed map of 1610 (not reproduced) shows that the north-west of the town did not generally extend beyond the boundary of the early medieval burh. The possible extent of Bedford town in the medieval period, as devised by Bedford Historic Environment Record and based on historic maps and the results of archaeological investigations, is shown on Fig. 4. Whilst findspots of medieval pottery have been recorded outside of this area (Fig. 4), these have generally been recorded close to the possible medieval extent of the town and the Friary. The exception to this is several findspots of medieval pottery 380m south-west of the Site at Bedford Station.

Post-medieval and modern

2.22. During the post-medieval and early modern periods, the town derived most of its trade from its position on the River Great Ouse. The 1765 Blatt Map of Bedford and 1815 Ordnance Survey Drawing of Bedford (not reproduced) show that the Site remained just outside of the town until the arrival of the railways in the mid-19th century when the town expanded west towards the railway line. This is supported by the results of archaeological investigations in and around the Site.

2.23. A watching brief in the south-east of the Site (Figs. 3: **D**) identified a stone-lined well of probable 19th century date. A watching brief also took place at Priory Lower School, 25m south of the Site (Fig. 3: **E**) in 2016-2017. Observation of the construction works identified very limited archaeological evidence. The area of development was heavily truncated by previous building and drainage works. The only features of note were a dark waterlogged deposit underlying modern building remains and overlying a possible ditch or depression in the geological horizon. The waterlogged deposits probably represent flooding or marshland and suggest that this was marginal land prior to settlement in the mid-19th century.

2.24. During the 19th century, a range of different industries developed alongside residential settlement, including ice-cream making, blacksmiths and cabinetmaking. These buildings are shown on the 1884, 1901, 1926 and 1950 Ordnance Survey maps (not reproduced) as densely constructed small, terraced houses which supported these industries. These earlier buildings were demolished and replaced with new tower blocks in the 1960s. An evaluation on the Site in 2012 (Fig. 3: **C**, Albion Archaeology 2013) identified some deeper foundations associated with this 19th century activity but generally recorded heavy truncation of the site due to the construction of the tower blocks. A considerable amount of overburden was also recorded across this area. No pre-19th century features were identified. It is likely that the former tower blocks will have removed any archaeological features within their footprint, but that archaeological features could survive beneath the overburden elsewhere within this part of the Site.

2.25. Parcel 1 is occupied by a 6-storey block of flats and garages (photos 1-2). Parcel 2 is currently occupied by three 12-storey tower blocks, Greyfriars Carpark, and a three-storey block of flats, fast food outlets and convenience stores (photos 3-4). Parcel 3 is occupied by a multi-storey carpark and retail space which was refurbished in the latter part of the 2010s (photos 5-6), and Parcel 4 is occupied by two blocks of 20th century small retail units (photos 7-8).

Photo 1 South façade of tower block on the west of the Site

Photo 2 North façade of the tower block and garages on the west of the Site

Photo 3 Towerblocks and Greyfriars Carpark

Photo 4 Greyfriars shops and tower blocks

Photo 5 Multi-storey car park and retail units in Parcel 3

Photo 6 Multi-storey car park, taken from the junction of Brace Street and Gwyn Street

Photo 7 Retail units in the north of Parcel 4, taken from the bus station

Photo 8 Retail units in the south of Parcel 4, taken from River Street

3. BUILT HERITAGE SUMMARY

3.1. This section considers potential non-physical effects upon the significance of susceptible heritage assets within the Site environs. Non-physical effects are those that derive from changes to the setting of heritage assets as a result of new development. All heritage assets included within the settings assessment are summarised in the gazetteer in Appendix 2 and shown on Figure 2.

3.2. Those assets identified as potentially susceptible to non-physical impact, and thus subject to more detailed assessment, are 'Bedford Town Conservation Area' and the Grade II Listed '22 & 24 Bromham Road', '26-36 Bromham Road' and '38-48 Bromham Road', recorded under three separate designations by Historic England. All are located within the Conservation Area. These are discussed in greater detail within the remainder of this section. Listed buildings on the north side of Bromham Road are also potentially going to be affected by redevelopment of the Site, but they have no known historical association with the Site and the potential impacts on these assets are not anticipated to be different to the impacts of development on the whole Conservation Area and as such these assets will not be discussed separately.

3.3. Other Listed Buildings are located within the study area but these have been scoped out of this report as they are visually screened or separated from the Site by intervening modern built development and infrastructure. They also have no discernible historical association with the Site. As indicated by the form of the current tower blocks, which are visible from the wider landscape around Bedford such as from Clapham Road looking towards the centre of town[1], any redevelopment of the Site at similar heights could be visible from the wider landscape, and possibilities to mitigate these impacts should be explored when further details on the development design is available.

Bedford Town Conservation Area and Listed Buildings on Bromham Road

3.4. Bedford Town Conservation Area generally abuts the Site's northern boundary, and slightly intrudes into a very small part of the north of the Site. Here, the Conservation Area covers historic buildings on Bromham Road and some surrounding side streets.

Characteristics and Built Form

[1] View of tower blocks from Clapham Road available at https://www.google.com/maps/@52.1464159,-0.4831773,3a,75y,139.63h,84.78t/data=!3m6!1e1!3m4!1s0egvsqNHN9AUmXB-kGIOSw!2e0!7i16384!8i8192

3.5. The Conservation Area primarily focuses on Bedford's historic High Street and 19th century development to the east. The Bedford Conservation Area Appraisal states that it derives its distinctiveness from:

- Its location at the heart of an historic market town, with a rich legacy of historic structures, particularly from the C18 and C19, including 114 listed buildings;
- Its relationship with the River Great Ouse as a primary topographic feature in an unaccented valley landscape, as an east-west axis and anchor of built form and also as an historic source of trade and sustenance and with a present function as a key amenity space;
- The survival of a medieval street pattern based upon an even older north-south route to and from the river crossing point and upon the layout of two fortified Saxon burh's protected by ditches, including the surviving King's Ditch;
- The continuing significance of the river crossing point, which is marked by the Town Bridge, a listed structure and part of a scheduled ancient monument;
- The survival of ancient sites, including the Castle mound and early church buildings, and a legacy of archaeological potential;
- Its ability to tell a coherent story of settlement from the Saxon period to the present day;
- Its long term civic and educational role and the associated range of historic buildings and spaces;
- The consistency of plot layout, building lines, building scale and proportion and an intricate but accessible skyline;
- Enclosure of the private realm;
- Building and tree framed views, with subtle accents such as St Paul's spire and the suspension bridge;
- The consistent quality of its Georgian and Victorian architecture and the presence of mature public space and tree planting;
- The predominant use of red and soft yellow-grey stock brick, slate and red clay tiles and timber sash windows, in variety and often with richly detailed entrances, recessed porches and decorative features but also with an important vein of ashlar and stucco;
- The unifying presence of stone kerbs and stone sett detail to carriageway margins.

3.6. The Listed Buildings along Bromham Road (Fig. 2: **B**) are located within this Conservation Area so will be considered alongside it. The buildings are early 19th century houses built in Neoclassical design (photos 9 and 10).

Photo 9 38-48 Bromham Road

Photo 10 22-30 Bromham Road

Experience and contribution of the Site to the Conservation Area

3.7. The Conservation Area is best experienced and appreciated at proximity, from within its extent. Areas of particular note are the historic High Street, Harpur Street and the Castle, where Bedford's historic character has largely been maintained through retention of historic buildings. Closer to the Site, many properties along Bromham Road add to the character of the Conservation Area, though the tired condition of some of buildings mean that they do not currently contribute as fully to the Conservation Area as they may once have done. The buildings which make a particularly positive contribution include 22-48 Bromham Road, and the buildings of Bedford Sixth Form 100m north of the Site. Other buildings along the street frontage, such as 52-62 Bromham Road (photos 11-12), do contain some historic fabric, but modern alterations have largely overwhelmed their historic character, creating a generally negative impact on this part of the Conservation Area. Views from Harpur Street towards Parcels 3 and 4 (photos 13-14) show that neither the multi-storey carpark nor the current retail units are visible from this location. The twelve storey tower blocks within Parcel 2 were also not discernible from this location The Site has no tangible historical or visual association with this part of the Conservation Area, and currently have no effect (positive or negative) on its appreciation.

3.8. The built-form within the Site looks tired and unkempt, in particular the 12-storey tower blocks in Parcel 2 which do not conform to the massing, scale, materials and form of buildings along Bromham Road or the surrounding area and the retail units in Parcel 4. The smaller 6-storey building in Parcel 1 looks relatively well-maintained and tidy and its brick/whitewash façades are more in keeping with the area, but the garages immediately north of it look dated and poorly cared for. Parcel 3, whilst looking less tired since the refurbishment in the late 2010s, is also not in keeping with the surrounding area. However, these buildings do not generally detract from appreciation of the Conservation Area to the north of the Site as the tower blocks and other built structures within the Site are not visible from the majority of Bromham Road or elsewhere within the Conservation Area. Any visibility between Bromham Road and the 12-storey tower blocks is generally limited to views down the side roads, where there are gaps in intervening built-form. Furthermore, the space between each of these tower blocks mean that, when visible, they do not completely dominate the skyline and do not overwhelm the Conservation Area.

3.9. Views from the rear of 22-48 Bromham Road are negatively affected by Parcel 2 of the Site. Whilst historically these views most likely contained two-storey built form in relative proximity, buildings pre-dating the 1960s redevelopment of the area, would have been more contemporary with 22-48 Bromham Road, and hence, may have shared greater levels of architectural form, material, massing and scale. Currently, there is no architectural or historical link between the Bromham buildings and the Site. However, at present, the distance between 22-48 Bromham Road and the tall tower blocks mean that the buildings do not feel completely dwarfed by these 1960s concrete intrusions. In general, the Site currently makes a negative contribution to the experience of the Conservation Area and these Listed Buildings, though the effect is small.

Potential development impacts

3.10. The Site is proposed for residential led development with some retail units. Whilst detailed development proposals were not available at the time of writing this report, it is understood that there could be up to 500-600 residential units included in the allocation. At present, the Site contains 204 residential units on Parcel 2 (68 per tower block), 45 in Parcel 1, and 12 in Parcel 4, a combined total of 261. Therefore, any new structures, constructed to replace the existing buildings on a similar scale, would not be adequate to address an allocation of this scale. Therefore, it is anticipated that a greater density of built form (perhaps more tower blocks on the car park in Parcel 2) and taller buildings would be needed to reach residential numbers which are double that of the Site's existing units. Whilst general allocation of the Site could result in some improvements to the setting of these assets through more sensitive design and materials than the existing structures, it is anticipated that allocation on this scale may result in a much larger density of tall buildings which could dwarf the Conservation Area, particularly around Bromham Road, and increase the current negative effect to the setting of the Conservation Area and the Listed Buildings along the south side of the road. It is suggested that a smaller allocation for the Site, perhaps in the region of 400 units spread across all four parcels, would be more appropriate for this Site and help to reduce any harm, however in accordance with policy 41S of the Local Plan and paragraph 202 of the NPPF, this harm will need to be weighed against the public benefits of the proposal(s) in determining the number of allocated units. Furthermore, it is anticipated that, once more detailed development proposals are available, a full Settings Assessment is carried out to identify any specific constraints which could not be determined at this stage. This assessment should also address potential impacts on the wider landscape, where relevant.

Photo 11 58-60 Bromham Road

Photo 12 62 Bromham Road

Photo 13 View towards Parcel 3 from Harpur Street – looking down St Loyes Street

Photo 14 View towards Parcel 4 from Harpur Street – looking down Paradine Court

4. SUMMARY FINDINGS

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. Previous archaeological investigations within the Site (Albion Archaeology 2013) have identified significant levels of modern truncation within the footprint of the existing tower blocks. Archaeological features could survive outside of these footprints but are likely to have been extensively truncated by modern services and infrastructure.

4.3. Due to the presence of underlying gravel terraces within the Site, the Site has potential for finds dating to the Palaeolithic period. If finds dating to this period are present within the Site, they are most likely to comprise isolated unstratified finds. Though the Site is located outside of the area occupied by the Greyfriars Priory main buildings, features relating to the priory could conceivably be present with the Site. Such evidence is most likely to comprise boundary ditches, burials, remains of smaller structures or evidence of agricultural activity. Parcels 3 and 4 also have potential for evidence of activity associated with the western extent of Saxon and medieval Bedford. Such features have the potential to advance understanding of the extent of the town during these periods. The Site also has potential for finds or features associated with 19th century occupation and industrial activity in this area of Bedford, predating the redevelopment of the Site in the 1960s. Any finds or features within the Site are likely to be of no more than local significance.

4.4. Any development on the Site in future would result in the disturbance to, or loss of, any buried archaeological remains which may be present. Archaeological remains comprise an important, non-renewable and finite resource, and the construction impacts could result in permanent and irreversible loss of, or damage to, any potential buried archaeological remains which may be present within the Site. Any buried archaeological remains within the Site are unlikely to represent an absolute constraint on development, although the known and potential remains would require consideration as part of the planning process.

Built Heritage

4.5. The Site is located immediately adjacent to the Bromham Road part of Bedford Town Conservation Area. In its current form, it does not have a significant impact on this part of the Conservation Area as views from the road towards the site are generally restricted by intervening built development. Whilst views from the Grade II Listed 22-48 Bromham Road are spoilt by the untidy, large forms of the three tower blocks within the Site, the visual impact of these towers on the assets are somewhat mitigated by the distance between them and the spacing of the towers, ensuring that they do not physically overwhelm the Listed Buildings.

4.6. Whilst detailed development proposals were not available at the time of writing this report, it is understood that there could be up to 500-600 residential units included in the allocation. At present, the Site contains 261 residential units. Therefore, any new structures, constructed to replace the existing buildings on a similar scale, would not be adequate to address an allocation of this scale. It is anticipated that a greater density of built form (perhaps more tower blocks on the car park in Parcel 2) and taller buildings would be needed to reach residential numbers which are double that of the Site's existing units.

4.7. Whilst the allocation of the Site could result in some opportunities for improvements to the setting of these assets via more sensitive design and materials than the existing structures, it is anticipated that allocation on this scale may result in a much larger density of tall buildings which could dwarf the Conservation Area, particularly around Bromham Road, and increase the negative effect to the setting of the Conservation Area and the Listed Buildings along the south side of the road. It is suggested that any new tall structures should maintain a similar distance from 22-48 Bromham Road. Smaller structures of 2-3.5 storeys could be built on the land between 22-48 Bromham Road and the 12-storey towers without having a significant impact on the Listed Buildings, if designed sensitively.

4.8. Furthermore, a smaller allocation for the Site would help to reduce this harm, however in accordance with policy 41S of the Local Plan and paragraph 202 of the NPPF, this harm will need to be weighed against the public benefits of the proposal(s) in determining the number of allocated units.It is anticipated that, once more detailed development proposals are available, a full Settings Assessment is carried out to identify any specific constraints which could not be determined at this stage. This assessment should also address potential impacts on the wider landscape, where relevant.

5. REFERENCES

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1926	Ordnance Survey Map, 1:2,500
1950	Ordnance Survey Map, 1,2,500

APPENDIX 1: HERITAGE STATUTE POLICY & GUIDANCE

Heritage Statute: Scheduled Monuments

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

Heritage Statute: Listed Buildings

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

Note on the extent of a Listed Building

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

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

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

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

Heritage Statue: Conservation Areas

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

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

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

National heritage policy: the National Planning Policy Framework

Heritage assets and heritage significance

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

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

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

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

The setting of heritage assets

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

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

Levels of information to support planning applications

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

Designated heritage assets

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

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

Bedford Borough Local Plan

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

Policy 41S – Historic environment and heritage assets

i. Where a proposal would affect a heritage asset the applicant will be required to describe:

> a. The significance of the asset including any contribution made by its setting and impacts of the proposal on this significance, and
>
> b. The justification for the proposal, how it seeks to preserve or enhance the asset/setting or where this is not possible, how it seeks to minimise the harm.

ii. This description must be in the form of one or a combination of: a desk based assessment; heritage statement; heritage impact assessment; and/or archaeological field evaluation. Further information will be requested where applicants have failed to provide assessment proportionate to the significance of the assets affected and sufficient to inform the decision-making process.

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

a. the nature of the heritage asset prevents all reasonable uses of the site; and

b. no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and

c. conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and

d. the harm or loss is outweighed by the benefit of bringing the site back into use.

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

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

a. The asset's archaeological, architectural, artistic and historic interest and any contribution to its significance from setting (including the wider historic landscape)

b. scale, form, layout, density, design, quality and type of materials, and architectural detailing

c. boundary treatments and means of enclosure

d. implications of associated car parking, services and other environmental factors

e. effect on streetscape, roofscape and skyline including important views within, into or out of heritage assets

f. impact on open space which contributes positively to the character and/or appearance of heritage assets

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

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

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

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

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

Good Practice Advice 1-3

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

Managing Significance in Decision-Taking in the Historic Environment' and 'GPA3 – The Setting of Heritage Assets'.

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

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

GPA3 – The Setting of Heritage Assets

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

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

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

Heritage significance

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

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

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

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

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

Effects upon heritage assets

Heritage benefit

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

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

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

Heritage harm to designated heritage assets

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

Effects upon non-designated heritage assets

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

APPENDIX 2: GAZETTEER OF SELECTED RECORDED HERITAGE ASSETS

Ref	Description	Grade/Period	NGR	**HE ref.** HER ref.
A	**Remains of the George Inn** A 15th-16th century gateway, The only surviving secular medieval building in Bedford.	Scheduled Monument, medieval	TL 0499 4980	**1004674** DBD2326 991
B	**22 and 24 Bromham Road, 26-36 Bromham Road, 38-48 Bromham Road** A pair of 19th century houses (22 and 24) and terraced 19th century houses (26-36 and 38-48). Three storeys.	Grade II, modern	TL 0459 5007 TL 0463 5005 TL 0465 5005	**1138025** 1269 **1128994** 1270 **1128993** 1271
C	**Trial trench evaluation at Greyfriars** Identified some foundations associated with 19th century industrial and residential activity on the Site. Generally heavily truncated due to construction of tower blocks in the 1960s. A considerable amount of overburden recorded across this area. No pre-19th century features were identified. It is likely that the former tower blocks will have removed any archaeological features within their footprint, but that archaeological features could survive beneath the overburden elsewhere within this part of the Site.	Modern	TL 0457 4994	EBB837
D	**Watching brief at Gwyn Court** A stone-lined well of probable 19th century date was the only feature identified during the watching brief.	Modern	TL 04606 49936	EBD302 16112 MBD16066
E	**Watching brief at Priory Lower School** The area was heavily truncated by previous building and drainage works. The only features of note were a dark waterlogged deposit underlying modern building remains and overlying a possible ditch or depression in the geological horizon.	Post-medieval	TL 0451 4991	EBB1044
F	**Evaluation at Bedford Bus Station** Evaluation comprised two trenches. It identified two ditches, a pit and a gully in the southern part of the Site. Two of the features (a gully and a pit) contained Saxo-Norman and medieval (10th-12th) century pottery. The site was heavily truncated by modern development and the trenches were subject to waterlogging.	Medieval	TL 0474 4990	EBB907

Ref	Description	Grade/Period	NGR	**HE ref.** HER ref.
G	**Ickleford to Bedford Roman Road** The exact location of the Ickleford to Bedford Roman Road is unknown but line is based on projection from its known route along London Road over the River Ouse. Limestone slabs have been found along this projected route.	Roman	TL 0634 4621 TL 0475 4974	10480 MBD10480 7681 MBD7681
H	**Tile-lined structure** Found in 1884. Remains of a hypocaust or a kiln, contained Roman pottery.	Roman	TL 0446 5010	249 MBD249
I	**Western boundary of Edward the Elder's burh** The south-west extent of the burh at Bedford is shown by a boundary ditch and the north-west extent by the Saffron Ditch, a former watercourse which ran through Bedford town centre.	Early medieval	TL 051 493 TL 0476 4975	1198 MBD1198 MBB22812
J	**Cut features and medieval pottery** Two ditches, a pit and a gully in the southern part of the Site. Two of the features (a gully and a pit) contained Saxo-Norman and medieval (10th-12th) century pottery.	Medieval	TL 0474 4990	EBB907
K	**Greyfriars Friary** Founded in 1238 and dissolved in 1538.	Medieval	TL 0444 4999	268 MBD268
L	**Moated enclosure** Only the southern extent of the moat survives. Moat is rectangular and about 10m wide.	Medieval	TL 0434 4993	15396 MBD15456
M	**All Hallows Church** All Hallows Church was demolished some time after 1610. Skeletons recovered from the Site have been identified, dating to the 12th-13th centuries. This suggests that the church had medieval origins.	Medieval	TL 0479 4999	13498 MBD18750

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