



Allocation Site: 764
Land north of St Neots Road
South of the A421

Heritage Appraisal



Report prepared for:
Bedford Borough Council

CA Project: MK0614

CA Report: MK0614_764

January 2022



Allocation Site: 764 Land north of St Neots Road South of the A421

Heritage Appraisal

CA Project: MK0614

CA Report: MK0614_764

prepared by	Rose Karpinski, Heritage Consultant
date	January 2022
checked by	Sophie Bell, Heritage Consultant
date	January 2022
approved by	Duncan Coe, Principal Heritage Consultant
signed	
date	January 2022
issue	1

This report is confidential to the client. Cotswold Archaeology accepts no responsibility or liability to any third party to whom this report, or any part of it, is made known. Any such party relies upon this report entirely at their own risk. No part of this report may be reproduced by any means without permission.

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

CONTENTS

1.	INTRODUCTION.....	3
2.	SUMMARY OF ARCHAEOLOGICAL RESOURCE	6
3.	THE SETTING OF HERITAGE ASSETS.....	17
4.	SUMMARY AND RECOMMENDATIONS.....	27
5.	REFERENCES.....	29

DRAFT

ILLUSTRATIONS

- Fig. 1 Site location plan
- Fig. 2 Superficial Geology within the Site
- Fig. 3 Selected Designated Heritage Assets
- Fig. 4 Prehistoric to Medieval Non-Designated Heritage Assets
- Fig. 5 Extract of the 1838 Tithe Map of Renhold
- Fig. 6 Extract of the First Edition Ordnance Survey Map of 1891
- Fig. 7 Extract of the Second Edition Ordnance Survey Map of 1902
- Fig. 8 The Setting of Howbury Ringwork and Medieval Trackway

PHOTOGRAPHS

- Photo 1 View of the Site
- Photo 2 View of Howbury Ringwork from the north
- Photo 3 View of Howbury Ringwork from the west
- Photo 4 view of trackway leading from Howbury Ringwork
- Photo 5 View from the Site towards Howbury Ringwork
- Photo 6 View of the Site from Howbury Ringwork
- Photo 7 View of Great Dairy Farm

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 north of St Neots Road and south of the A421 (hereafter referred to as 'the Site'). The Site comprises an irregularly shaped network of agricultural fields, measuring c. 22ha (NGR:511008 251485; Fig. 1). The Site is located within the eastern fringes of Renhold and it is bounded to the east and north by agricultural fields, to the south by St Neots Road and to the west by the A421.
- 1.2. This appraisal has been commissioned to provide information with regard to potential heritage and archaeology constraints to allocation of this land for development.



Fig. 1 Site location plan

Aims

- 1.3. The primary aim of this appraisal is to identify any potential archaeological and heritage constraints which may need to be taken into consideration as part of the decision to allocate this Site for future redevelopment. This appraisal focusses upon the heritage resource within the Site itself, although the resource within the wider landscape is considered where appropriate (within a 1km study area) to more fully understand the archaeological potential and possible constraints within the Site.

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

1.5. The objectives of the appraisal are:

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

Methodology

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

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

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

Limitations

1.8. This appraisal is a desk-based study and has utilised information derived from a variety of online sources, and informed by a site visit. While the level of detail included within the appraisal provides an overview of the heritage resource and constraints within the

Site, any planning applications would need to be accompanied by a full desk-based heritage assessment, in line with the relevant guidance (ClfA 2020).

- 1.9. A walkover survey was conducted within the Site by Rose Karpinski on 18th January, 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.

DRAFT

2. SUMMARY OF ARCHAEOLOGICAL RESOURCE

Landscape context

- 2.1. The Site is located to the south of the A421 north of St Neots Road in the eastern extent of the village of Renhold. The surrounding land is predominantly in use for agricultural fields, beyond some residential development c. 40m south of the Site. The Site lies on a gentle slope with the north of the Site sitting at c. 33m aOD (above Ordnance Datum) and the south of the Site sitting at c. 36m aOD, the low level runs through the Site alongside the brook which feeds to the River Great Ouse which lies, at its closest, c. 340m south of the Site.



Photo 1. View of the Site

- 2.2. The bedrock geology is recorded within the Site as Peterborough Member Mudstone, a sedimentary bedrock which formed between 164 and 166 million year ago during the Jurassic Period when the local environment was dominated with shallow seas (British Geological Survey 2022). There are a number of superficial geologies recorded within the Site (Fig. 2). Oadby Member Diamicton is the predominant deposit, which formed up to 2 million years ago in the Quaternary Period when the local environment was dominated by ice age conditions (British Geological Survey 2022). In the south of the Site Biddenham Member sand and gravel is record, this formed up to 3 million years ago during the Quaternary Period, when the local environment was dominated by rivers (British Geological Survey 2022). Running through the Site is a deposit of Head, clay, silt, sand and gravel which formed up to 3 million years ago during the Quaternary Period when the local environment was dominated by subaerial slopes (British Geological Survey 2022).

2.3. No boreholes are recorded to have been driven within the Site.

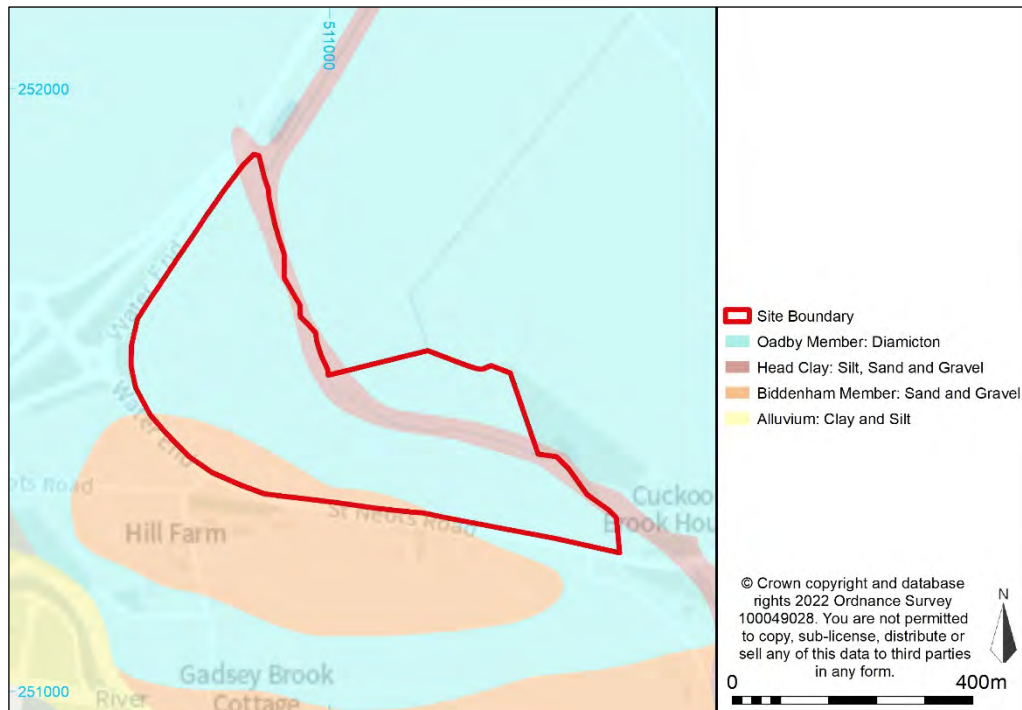


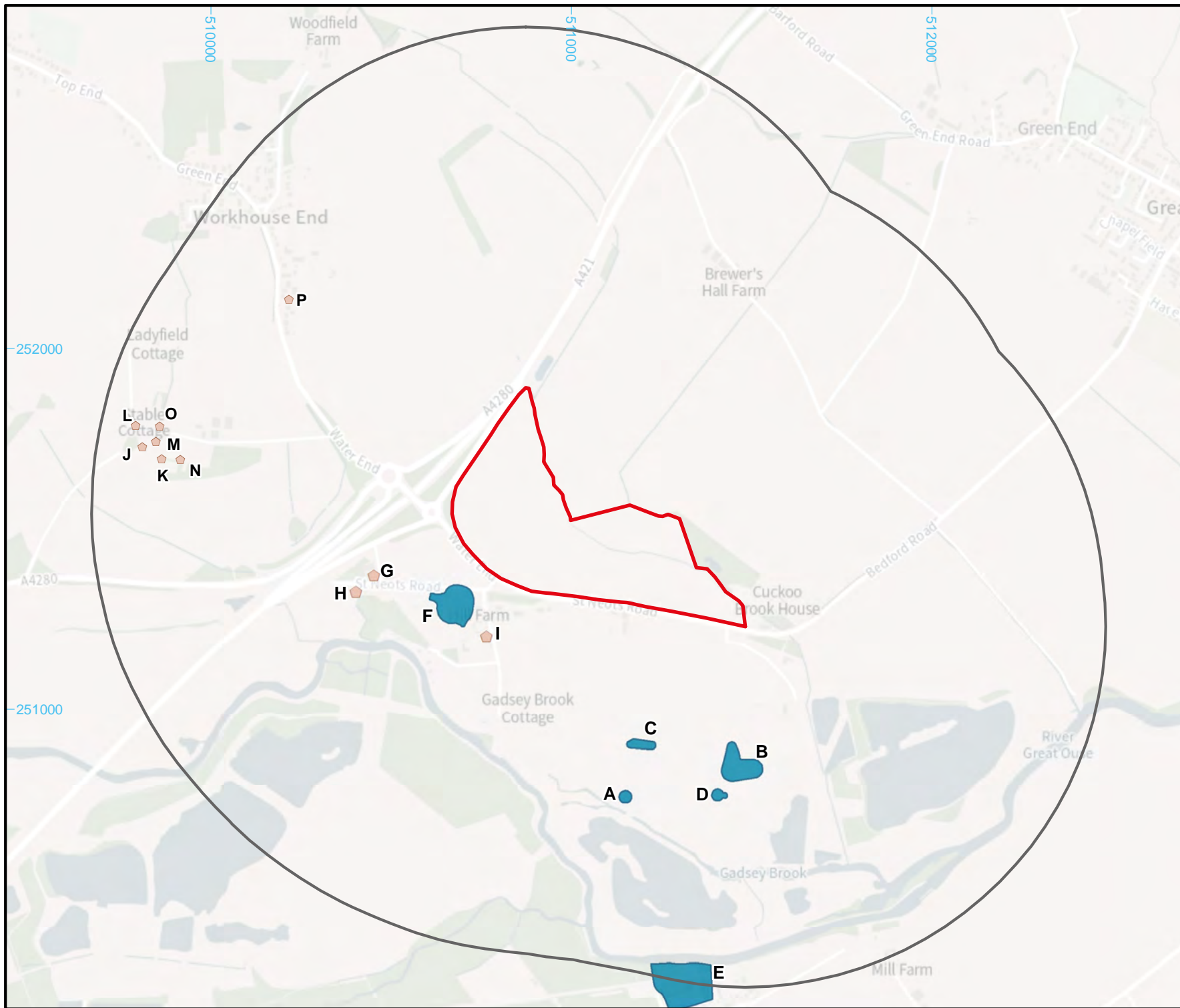
Fig. 2 Superficial Geology within the Site

Designated heritage assets

2.4. There are no designated heritage assets recorded within the Site, nor is the Site situated within a Conservation Area; there are no Conservation Areas within the study area.

2.5. There are five Prehistoric Scheduled Monuments to the south of the Site; a Hengi-form monument lies c. 520m south of the Site (NHLE: 1015586, Fig. 3, **A**), a Henge, henge type monument and bowl barrow lies c. 340m south of the Site (NHLE: 1015587, Fig. 3, **B**), two bowl barrows lie c. 380m south of the Site (NHLE: 1015589, Fig. 3, **C**) and a Bowl Barrow lies c. 480m south of the Site (NHLE: 1015590, Fig. 3, **D**). 'The Docks' moated Site and dock lies c. 990m south of the Site (NHLE: 1012079, Fig. 3, **E**). Howbury ringwork and medieval trackway lies c. 80m south-west of the Site (NHLE: 1009627, Fig. 3, **F**).

2.6. A number of Listed Buildings are also within the study area. A selected number of these are discussed, and listed in Appendix 3 below.



- Site Boundary
- Study Area
- Scheduled Monument
- Grade II Listed Building



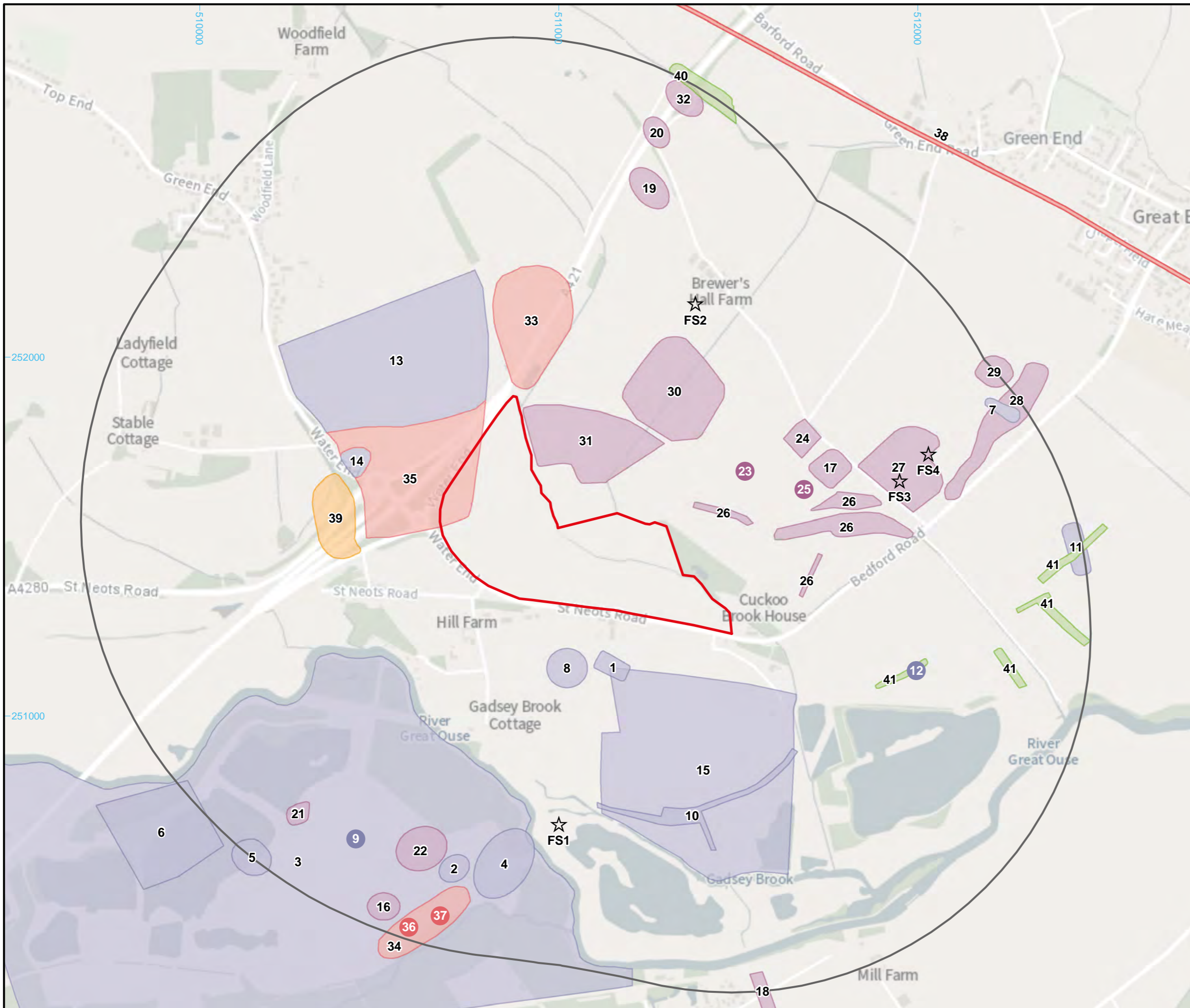
© Crown copyright and database rights 2022 Ordnance Survey 100049026. You are not permitted to copy, sublicense, distribute or sell any of this data to third parties in any form.

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

PROJECT TITLE
 Site 764: Land north of St Neots Road and south of the A421

FIGURE TITLE
 Selected Designated Heritage Assets


DRAWN BY	RK	PROJECT NO.	MK0614	FIGURE NO.
CHECKED BY	SB	DATE	10/03/2022	3
APPROVED BY	DC	SCALE @ A1	1:14,000	



- Site Boundary
- Study Area
- Early Prehistoric
- Later Prehistoric
- Roman
- Early Medieval
- Medieval
- ☆ Find Spot



© Crown copyright and database rights 2022 Ordnance Survey 100049028. You are not permitted to copy, sub-license, distribute or sell any of this data to third parties in any form.



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

PROJECT TITLE
 Site 764: Land north of St Neots Road and South of the A421

FIGURE TITLE
 Prehistoric to Medieval Non-Designated Heritage Assets

DRAWN BY RK	PROJECT NO MK0614	FIGURE NO.
CHECKED BY SB	DATE 31/01/2022	4
APPROVED BY DC	SCALE@A3 1:10,000	

-
- 2.7. Grade II Listed Great Dairy Farm lies c. 260m south-west of the Site (NHLE: 1114908: Fig. 3, **G**). Grade II Listed Fairfield Cottage lies c. 310m south-west of the Site (NHLE: 1138234, Fig. 3, **H**). Grade II Listed Hill Farmhouse lies c. 150m south of the Site (NHLE: 1321205, Fig. 3, **I**). Grade II Listed 52 Green End (NHLE: 1311969), located c. 680m north-west of the Site (Fig. 3, **P**).
- 2.8. Grade II Listed Howbury Hall (NHLE: 1138189) is located c. 875m north-west of the Site (Fig. 3, **J**). A number of auxiliary buildings associated with the Hall are also Listed such as the Grade II Listed Stable Block (NHLE: 1321202) located c. 900m north-west of the Site (Fig. 3, **L**). The Grade II Listed Dower Cottage (NHLE: 1114907) is located c. 850m north-west of the Site (Fig. 3, **O**). The Grade II Listed Dairy and Laundry to Howbury Hall (NHLE: 1311948) located c. 840m north-west of the Site (Fig. 3, **M**). Grade II Listed Ice House to Howbury Hall (NHLE: 1138221) located c. 800m west of the Site (Fig. 3, **K**). The Grade II Listed Garden Wall to Howbury Hall (NHLE: 1321203) is located c. 780m west of the Site (Fig. 3, **N**).
- 2.9. Potential non-physical impacts on these assets will be discussed in more detail in Section 3 of this report. Designated heritage assets will not be discussed further in Section 2, unless relevant to the archaeological baseline of the Site.

Prehistoric

- 2.10. There is no recorded prehistoric activity within the Site.
- 2.11. A single Palaeolithic find has been made within the study area c. 590m south of the Site (Fig. 4, **FS1**). It is likely that the river valley to the south of the Site would have been attractive during the Palaeolithic period.
- 2.12. Cropmark features have been identified through appraisals of aerial photographs, mostly undertaken as part of the national mapping programme, these identify potential features below ground through either the enhancement or the reduction of crop growth due to below ground features. Cropmarks indicating the presence of early prehistoric funerary activity have been identified to the south of the Site from c. 130m south to the extent of the study area (Fig. 4, **1, 2, 3, 4, 5, 6, 8, 9, 15**). Here cropmarks indicating ring ditches, enclosures and causeways have been identified which all indicate possible prehistoric funerary activity. These are in a close proximity to Scheduled monuments which lie in the river valley which also are indicative of ceremonial and funerary activity. These cropmarks combined with the Scheduled Monuments indicate that this area of the river valley was highly utilised for ceremonial

and funerary functions during the prehistoric period and it is likely that there was a high level of settlement in the surrounding area to support these activities. When excavated these have revealed remains of Neolithic to Bronze Age date c. 340m south-west of the Site (Fig. 4, **3**, South Midlands Archaeology 1991). A Neolithic burial was revealed c. 990m south-west of the Site (Fig. 4, **6**, Bedfordshire Archaeology 1996).

- 2.13. Evidence of early prehistoric funerary activity has also been identified as cropmarks c. 980m north-east of the Site (Fig. 4, **7**) where a probable round barrow cemetery has been identified. Also c. 970m east (Fig. 4, **11**) where further ring ditch or barrow features have been identified as cropmarks and c. 530m east where cropmarks indicate the presence of a further barrow (Fig. 4, **12**)
- 2.14. A prehistoric field system has been provisionally identified through cropmark evidence c. 540m south of the Site (Fig. 4, **10**).
- 2.15. Cropmarks indicating possible settlement activity have been identified c. 50m north-west and 240m north-west of the Site (Fig. 4, **13** and **14**). These show a possible Bronze Age to Roman settlement complex, in the form of an agglomeration of curvilinear enclosure with a further two smaller enclosures located to the east. These cropmark features have not been investigated, as such their date could be later, and these may instead represent a Late Iron Age to Roman settlement. Also a curvilinear enclosure which also has not been investigated but its form appears to suggest Bronze Age to Roman period date.
- 2.16. Later Prehistoric activity has been identified throughout the study area. In the south within the river valley features have been identified which indicate settlement activity, such as enclosure features (Fig. 4, **16**, **21** and **22**). One of which located c. 700m south-west of the Site (Fig. 4, **22**) comprised a sub rectangular ditched enclosure, a smaller triangular enclosure was also attached to its south-eastern end. The enclosure features contained evidence of roundhouses, post holes and domestic waste. Indicating that this was a point of long-term settlement during the Iron Age period.
- 2.17. Further evidence of funerary activity has been identified provisionally dating to the later prehistoric period is a triple boundary and ring ditch feature c. 980m south of the

Site (Fig. 4, **18**), the boundary is recorded at a right angle to the river indicating that this may have been a trackway from the river to a funerary monument.

- 2.18. Iron Age settlement has been identified c. 860m north of the Site (Fig. 4, **19**) here excavations undertaken revealed roundhouses, ditches, pits and postholes indicative of a farmstead settlement. A further Iron Age settlement comprising two ditched enclosures was identified c. 900m north of the Site (Fig. 4, **20**). A single round house was round which contained a hearth in the centre, a single un-urned cremation was also found however this is thought to be of Roman date. To the north of this an inhumation grave of a single adult was identified c. 1km north of the Site (Fig. 4, **32**). this was the only burial identified during a trial trench evaluation (Northamptonshire Archaeology 2004) and has been provisionally dated to the Late Iron Age or Early Roman period, however no dating evidence was recovered.
- 2.19. A network of enclosure features has been identified directly to the north-east of the Site (Fig. 4, **31** and **30**) the presence of these indicates that there is the potential for widespread settlement across this area.
- 2.20. It appears that settlement was focused to the east of the Site (Fig. 4, **17**, **23**, **24**, **25**, **26**, **27**, **28**, **29**), from this area a large number of cropmarks indicating the presence of enclosure features, which are likely to have contained settlement or be associated with settlement such as field boundaries have been identified.
- 2.21. These cropmarks likely indicate regions of possible settlement activity and due to the formation of the cropmarks this activity has been ascribed to the Iron Age to Roman period, during which time enclosures became more regular and squared compared to the more curvilinear enclosures observed during the early prehistoric periods.
- 2.22. There is a general trend across the monuments identified within the study area for early prehistoric cropmark features to be located to the south of the Site in the river valley. With later prehistoric features (Iron Age to Iron Age transition into Roman) to be found to the north and north-east of the Site along the hillsides dropping towards the valley. Should any prehistoric activity be present within the Site it is more likely that it would fall into the later prehistoric phase of activity.

Romano-British

- 2.23. Roman period activity has been recorded within the Site (Fig. 4, **35**) A curvilinear enclosure system, 2 cremations and 2 four post structures were revealed dating to

the early Roman Period, following this a 2nd to 3rd century settlement which consisted of a series of enclosures located along a pair of trackways was identified. Associated with these were a number of roundhouses, a probable rectilinear building, a number of pottery kilns, corn dryer, a cremation cemetery and 7 inhumation burials. This indicates a substantial settlement in the region, which may have spread south eastwards, beyond the scope of the investigation, across the whole Site.

- 2.24. A Roman period enclosure feature has been identified c. 35m north of the Site (Fig. 4, **33**) this also contained a network of field boundaries, showing further evidence of Roman utilisation of the land close to the Site.
- 2.25. In the river valley, evidence of Roman period occupation has been identified c. 840m south of the Site (Fig. 4, **34, 36, 37**). This comprised enclosure and ditches indicating land management and occupation. The proximity to the river indicates that this was a substantial pull factor in deciding to settle at that location.
- 2.26. Finds of a Roman date have been made throughout the study area a Roman Brooch was found c. 530m north of the Site (Fig. 4, **FS2**) and Roman coins have been found c. 640m north-east and c. 760m north-east of the Site (Fig. 4, **FS3** and **FS4**).
- 2.27. The former Roman Road (Viatores No. 225) is projected to run c. 1.1km north of the Site (Fig. 4, **38**). This route connected Sandy with Sharnbrook. During this period, the Site lay in the hinterland to integral routes of movement.

Early medieval

- 2.1. The Site predominantly lies within the historic parish of Renhold, the name is thought to derive from the Old English for 'roe-deer nook of land' (University of Nottingham 2022). A small portion of the Site lies within the historic parish of Great Barford.
- 2.2. Evidence of early medieval activity has been identified within the study area c. 240m west of the Site (Fig. 4, **39**) short lived early medieval occupational evidence was identified (Northamptonshire Archaeology 2004). Beam slot and post built structures along with pits and fence lines were associated, the buildings were near the boundary ditch for the settlement, within the settlement, there appear to have been subdivisions between land associated with each building.
- 2.3. It was during the late Anglo-Saxon period that Howbury ringwork and medieval trackway (Fig. 3, **F**) was constructed c. 80m south-west of the Site, this will have had

a sphere of influence over the surrounding areas, and it is likely that there was a certain amount of settlement associated with this, which has either been lost to modern development, or is yet to be identified in the archaeological record. However, there is no evidence to suggest that buried archaeological remains associated with the Ringwork survive within the Site. Whilst some early interpretations of this castle were that it was a Roman amphitheatre, there is also the theory that it may have been built by the Danes in their defence of the Danelaw which ran through Bedford.

- 2.4. 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 383¹). 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.

Medieval

- 2.5. During the medieval period there is no recorded activity within the Site.
- 2.6. The Scheduled medieval moated Site (Fig. 3, **E**) is located c. 990m south of the Site. This is a rectangular moated Site connected to the river. The moated Site has outer moated enclosures and is thought to have been the location of a medieval manor, chapel and dovecote.
- 2.7. Medieval settlement evidence has been identified c. 1km north of the Site (Fig. 4, **40**), where several ditches, pits and postholes have been identified (Northamptonshire Archaeology 2004) containing pottery of a medieval date.
- 2.8. A network of cropmarks that are thought to represent a medieval to post-medieval field system have been identified c. 450m east of the Site (Fig. 4, **41**). This indicates that the land surrounding the Site was under arable cultivation during this period.

Post-medieval and modern

- 2.9. The tithe map of 1838 (Fig. 5) Renhold shows the Site to be made up of eight portions of land each owned by Frederick Polhill Esquire and occupied by Thomas Street, the land is associated with Great Dairy Farm. Portions 243, 244 and 242 in the north-west of the Site are recorded as being in use as grass, whilst plots 249, 250, 251, 252

¹ <https://parker.stanford.edu/parker/catalog/mv340ty8592>

and 253 are recorded as being under arable cultivation. There is no tithe map available for Great Barford which a small section of the Site lies within. The stream which runs through the Site is depicted on the tithe map along the boundary between Renhold and Great Barford parishes. The use of the land suggest that the Site formed pasture and grazing land during the 19th century.

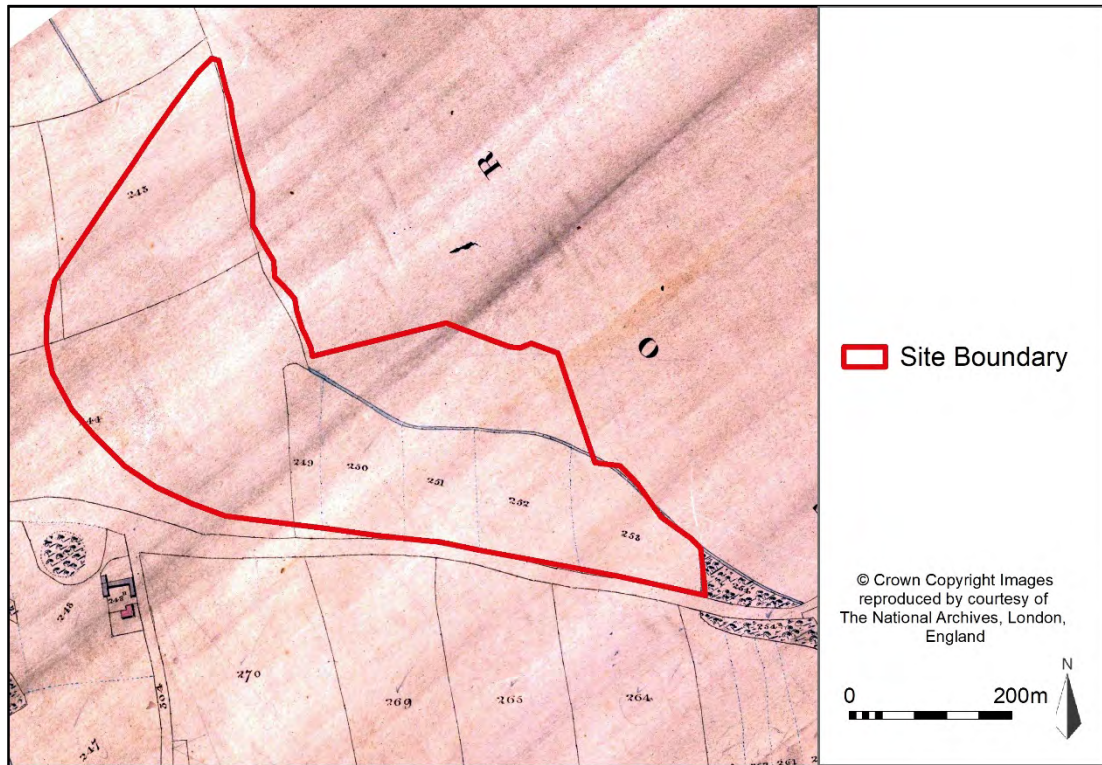


Fig. 5 Extract of the 1838 Tithe Map of Renhold

- 2.10. The first edition ordnance survey map of 1891 (Fig. 5) shows there to have been no significant changes within the Site, the division between the land parcels in the south of the Site have been removed, suggesting that the use of this land may have changed to pasture, or this may display a change in farming practices to the utilisation of larger fields for arable crops.
- 2.11. No further changes within the Site are illustrated on the second edition Ordnance Survey Map (Fig. 6). No development is known to have taken place within the Site.
- 2.12. The introduction of the A421 to the north of the Site in 2006 resulted in the portions of land which made up the north of the Site being removed. The Site now consists of two fields, one irregular shaped portion which curves around the A421, and the small irregularly shaped portion to the north of the brook which runs through the Site.



Fig. 6 Extract of the First Edition Ordnance Survey Map of 1891

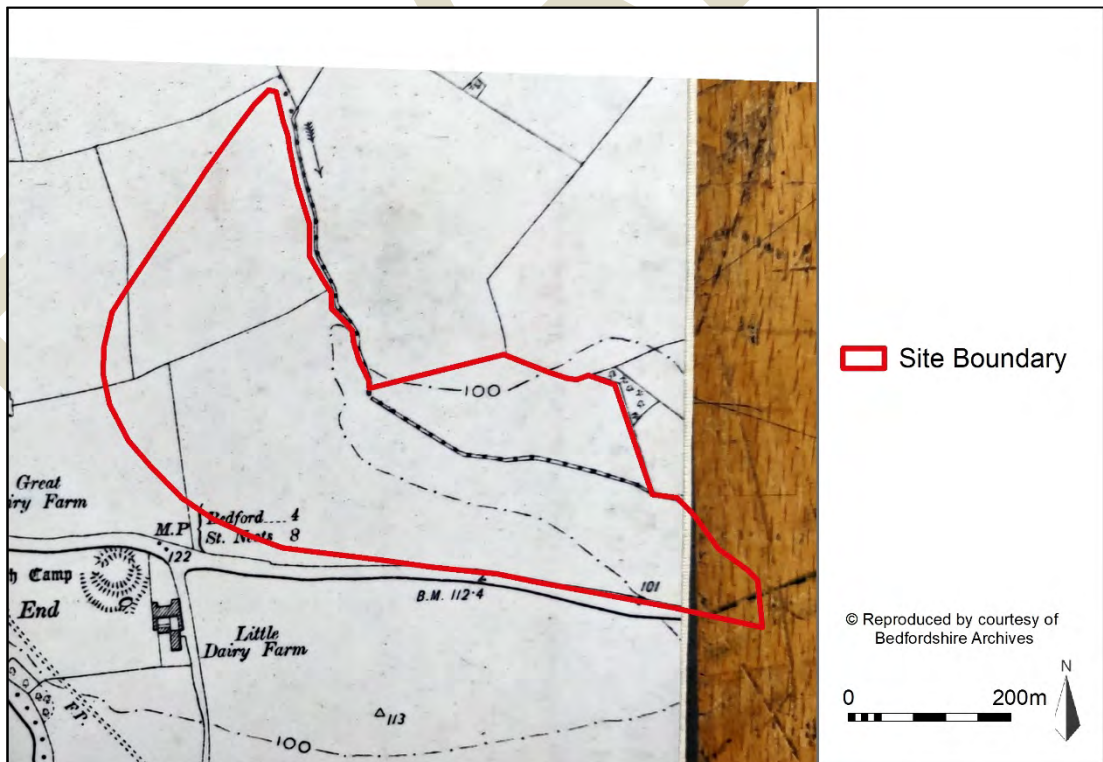


Fig. 7 Extract of the Second Edition Ordnance Survey Map of 1902

3. THE SETTING OF HERITAGE ASSETS

- 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, designated heritage assets have been identified as sensitive to development within their settings, with the potential to impact on their significance as designated heritage assets. These include:
- Howbury Ringwork and Trackway (NHLE: 1009627, Scheduled Monument); and
 - Great Dairy Farm (NHLE: 1129006, 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 Fairfield Cottage (Fig. 3, **H**), Grade II Listed Hill Farmhouse (Fig. 3, **I**) Grade II Listed Howbury Hall and associated buildings (Fig. 3, **J-O**) and Grade II Listed 52 Green End (Fig. 3, **P**).
- 3.4. Fairfield Cottage has been dismissed from further assessment due to the lack of historic association between the Site and the cottage and the fact that Fairfield Cottage does not derive its historic significance from the use of land within the Site.
- 3.5. Hill Farmhouse has been dismissed from further assessment due to a lack of historic association between the house and the Site and the fact that Hill Farmhouse does not derive its significance from the use of land within the Site. Hill Farmhouse's setting is principally domestic, with an enclosed garden to the rear, it derives no heritage significance from the land within the Site, and its significance is derived principally from its historic fabric and character. Due to the change in the function of this building and its modern setting, agricultural land use in the wider area does not contribute towards the significance of Hill Farmhouse. There is no direct intervisibility between the farmhouse and the Site due to intervening modern built form, vegetation and topography.
- 3.6. Howbury Hall and associated buildings (Fig. 3, **J-O**) do not derive any of their heritage significance from the land within the Site and this is principally derived from their

architectural style, historic fabric and group association, as such they have been dismissed from further assessment. Howbury Hall shares a historic association with the land within the Site, however a change in use within the Site will not alter the significance of the building (in effect the historical association will not be lost, even though the character of the Site will be changed). These buildings share no intervisibility with the Site. These buildings have also been cut off from the landscape within the Site by the introduction of the A421 which lies between the buildings and the Site.

- 3.7. Grade II Listed 52 Green End (Fig. 3, **P**) has also been dismissed from further assessment due to the lack of intervisibility between the Site and the house, the lack of historic association between the Site and the house and the fact that 52 Green End does not derive its historic significance from the use of land within the Site. 52 Green End is nestled in a residential setting, and is cut off from the agricultural landscape surrounding it, including the land within the Site.
- 3.8. 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 Listed Buildings through alteration to their setting.
- 3.9. The two heritage assets, that have the potential to be affected by future development on the Site, are discussed below.

Howbury Ringwork and Trackway: Scheduled Monument

- 3.10. Howbury ringwork is situated at the top of a steep slope which falls southwards to the River Great Ouse, it includes part of a later medieval droveway which ran through the castle site this was likely unmetalled and formed by prolonged use for the transportation of goods and livestock.
- 3.11. Ringworks are medieval fortifications which were built and occupied from the late Anglo-Saxon period onwards. They comprised a small, defended area containing buildings which was surrounded or partly surrounded by a substantial ditch and a bank surmounted with a timber palisade or stone wall. Ringworks acted as strongholds for military operations and are rare nationally with only 200 recorded examples.
- 3.12. The archaeological remains remain undisturbed, as such Howbury Ringwork retains its potential for the recovery of environmental evidence from the fills of the ditch and

the buried land surfaces beneath the rampart banks, any evidence may contribute towards a detailed understanding of the nature of the monument and the status and economy of its inhabitants.

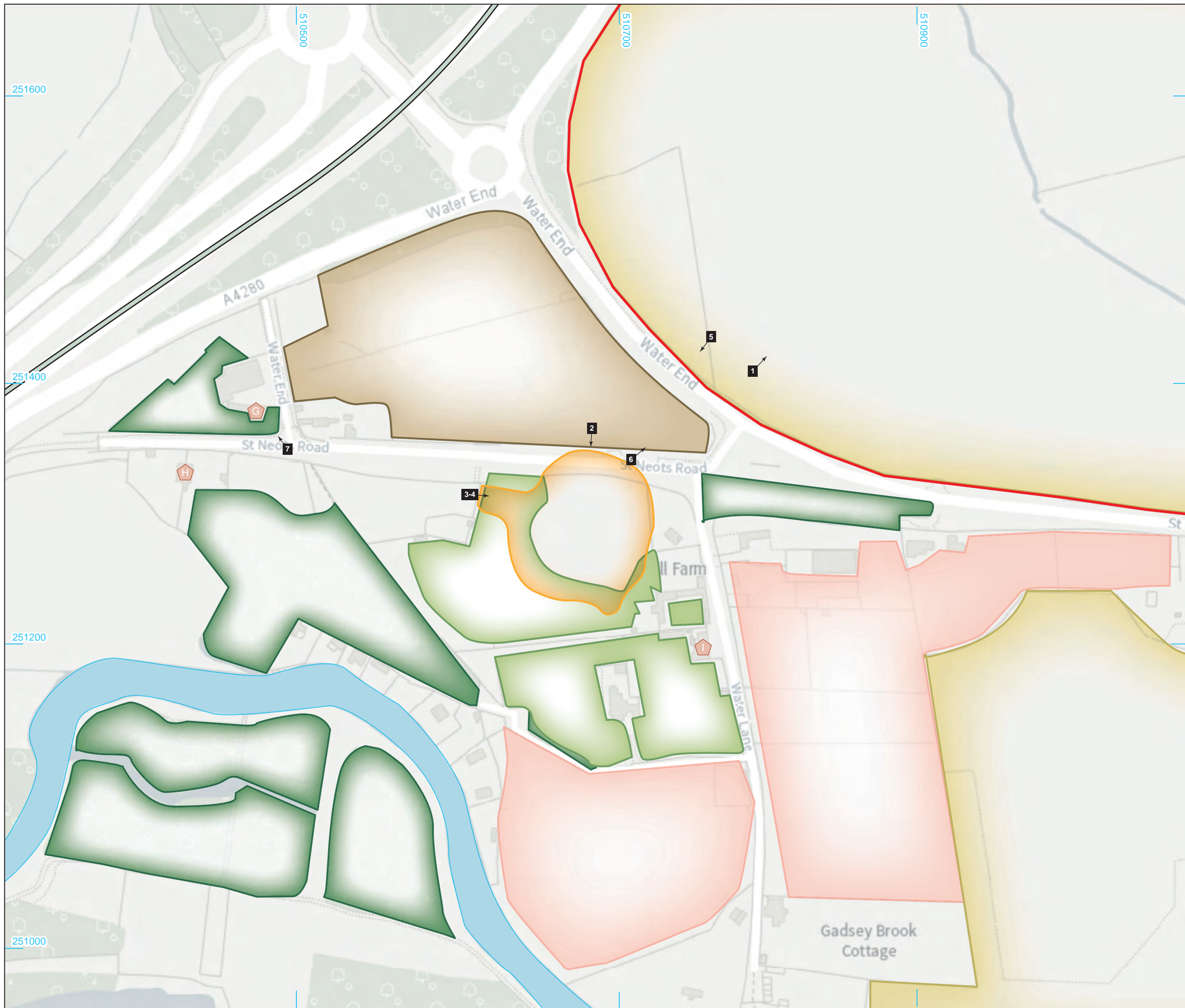
3.13. The ringwork was once known as Addingreves Castle and comprises an earthen bank 8m wide but up to 3m high enclosing a circular area 40m in diameter, the bank is breached by two entrances, one to the west and the other to the north-east. Surrounding the ringwork is a ditch which is up to 24m wide, this is now mostly infilled but is still 1m deep, suggesting that this was once much deeper.

3.14. Howbury Ringwork was thought to be Roman amphitheatre in the early 19th century, and is now considered to be a Norman castle, however, some believe it may have been built by the Danes in their defence of the Danelaw which ran through Bedford, this has not been proven.

Setting of Howbury Ringwork

3.15. Howbury Ringwork is set directly to the south of St Neots Road (Fig. 8), which is a quiet residential road with little traffic and few houses. Howbury is enclosed by thick vegetation to the north (Photo 2) which also shields it from the road noise and activity associated with the A421 to the north.

3.16. Howbury Ringwork now sits within a residential garden (Photo 3) which makes up a key part of its immediate setting. This represents a negative aspect of the setting of the Ringwork, as the proximity to the house removes the sense of scale and dominance that the mound was designed to hold. The earthwork remains have been demoted to a garden feature, from a castle from which authority would have been found.



- Site boundary
- Scheduled Monument
- Grade II Listed Building
- Domestic garden
- Agricultural Land
- Pasture
- Scrubland
- Woodland
- River Great Ouse
- A421
- ← 7 Direction of photograph

0 1:2500 125m

© Crown copyright and database rights 2022 Ordnance Survey 100049028. You are not permitted to copy, sub-license, distribute or sell any of this data to third parties in any form.

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

PROJECT TITLE
 Site 764: Land north of St Neots Road and south of the A421

FIGURE TITLE
 The Setting of Howbury Ringwork and Medieval Trackway

<small>DRAWN BY</small> HMM	<small>PROJECT NO.</small> MK0614	<small>FIGURE NO.</small>
<small>CHECKED BY</small> DJB	<small>DATE</small> 20/01/2022	8
<small>APPROVED BY</small> RK	<small>SCALE@A3</small> 1:2500	



Photo 2 View of Howbury Ringwork from the north



Photo 3 View of Howbury Ringwork from the west

- 3.17. Earthwork remains of the trackway can be seen from the west leading west towards Bedford (Photo 4). These add to the significance as they display the amount of traffic and movement which moved through the castle, demonstrating that it was a place frequented in the landscape.
- 3.18. The ringwork is situated c. 130m north-east of the River Great Ouse, and is on a hill overlooking the river valley. This proximity to the river would have enabled the castle to have a network of river trade and control over who and what made it to Bedford or onwards to Great Barford. This proximity is a positive aspect of the setting of the Ringwork.
- 3.19. The surrounding landscape to the Ringwork is mixed (Fig. 7) and comprises residential properties and gardens, as well as woodland, scrubland and pasture and

agricultural land. The residential properties in proximity to the Ringwork contribute a negative aspect of the setting, as they limit the prominence of the earthwork within the immediate landscape. The other elements of the wider setting contribute a neutral aspect of the setting of the Ringwork.

- 3.20. Prior to the construction of the A421 the Ringwork was positioned adjacent to a major routeway between Bedford and St Neots, as it had been during the medieval period. The construction of the road, resulted in the ringwork losing its position along a main road, which was a key part of its historic setting. Whilst this change could be considered positive in that it removed traffic directly adjacent to the monument, this has resulted in the loss of a key element of its setting.



Photo 4 view of trackway leading from Howbury Ringwork

Contribution of the Site to Howbury Ringwork and potential impacts

- 3.21. The Site is located c. 80m to the north of Howbury Ringwork and is separated from the monument by two roads and an area of scrubland. There is no known historic association between the Site and Howbury Ringwork, however it is possible that during the medieval period the land within the Site was under arable cultivation which may have been under the influence of Howbury Ringwork..
- 3.22. From the Site Howbury Ringwork is not visible (Photo 5), there is no indication that the remains of a castle lie to the south of the Site. From Howbury Ringwork the Site is not visible (Photo 6), this is in part due to the dense vegetation which surrounds Howbury Ringwork but also the scrubland and roads which sit between them.



Photo 5 View from the Site towards Howbury Ringwork



Photo 6 View of the Site from Howbury Ringwork

3.23. The Site is proposed for an employment allocation, which could include both small and larger scale employment units. Such a change within the Site may be visible from Howbury Ringwork, meaning that views across the road towards the Site could be altered and the rooftops of larger buildings may be visible. However, these specific existing views are not authentic representative experiences of the medieval landscape. They do not play a meaningful role in the story or interpretation of the Ringwork. Such a subtle (distant) change in this aspect (via the potential for the rooftops of large buildings to be visible) will have no material impact on the significance or experience of the Ringwork.

3.24.

3.25. The increased traffic which may result from the change of use within the Site, could result in increased movement within the wider setting of the Ringwork. This change in activity level is unlikely to result in increased traffic along St Neots Road, as such the buffer between the monument and the roadway would still be in place shielding the monument from activity in the wider area. This change in the wider landscape would not cause harm to significance of the monument nor would it harm ones experience of the heritage significance.

3.26. The agricultural character of the Site sits within a setting comprising a mixed tapestry of 21st century land-uses. While the Site is likely to have historically formed part of the agricultural setting of Howbury Ringwork, the relationship is tenuous. Any changes in character of the Site will not have a material impact (cause harm) to the heritage significance of the Ringwork.

Great Dairy Farm

3.27. Great Dairy Farm is a Grade II Listed farmhouse which lies along St Neots Road.

3.28. Great Dairy Farm's listing description is as follows:

Farmhouse. C18 and early C19. Earlier rear wing is timber framed, with red brick infill, with colour washed rough cast render. Later front block is red brick with colour washed plaster facade incised to imitate ashlar. C20 tile roofs. Double-pile plan with 2-span roof. 2 storeys. Front block: ground floor has 2 rectangular bays with French windows. First floor has 2 2-light casements with glazing bars in architrave surrounds with brackets to sills. They flank small 2-light casement, under flat stucco arch with keystone, also with brackets to sill. Central doorway under gabled timber porch with trellis-work sides, wavy-edged bargeboards and drop finial. Red brick paired stacks to both gable ends. Eaves level brick band to gable ends. Rear block: various casements, all C20. One-storey out house additions to W and E.

Historic England 1983

3.29. The building is shielded from St Neots Road by a large number of mature trees and shrubbery (Photo 7). This restricts its prominence in the landscape. The building presides over a large amount of scrubland to its east (Fig. 7). The building derives its significance from its architectural style and historic character.

3.30. The setting of Great Dairy Farm has been significantly altered by the introduction of the A421 to the north. This resulted in severing the connection between Great Dairy Farm and the village of Renhold.

- 3.31. The farmhouse has had an historic association with the land within the Site as it is recorded as managing the land in the Tithe map of 1838. This association has since been lost and the land within the Site is no longer managed by Great Dairy Farm. This former association does not confer a meaningful contribution to the significance of the farmhouse, as such the change of character within the Site to employment land would not constitute a harmful change to the farmhouse. Furthermore, this historical association will not be lost in any effect.



Photo 7 View of Great Dairy Farm

- 3.32. There is limited intervisibility between the Site and Great Dairy Farm, due in part to topography but also due to the vegetative cover afforded to the house. The potential for employment scale development (large buildings) with the Site may result in the upper levels (rooftops) of new buildings within the Site being visible from Great Dairy Farm, however, this change would not detract from the appreciation of Great Dairy Farm. It is from the south that the key elevation of the building can be appreciated, roofs of buildings to the east would not detract from the experience of this key element of the building's significance.
- 3.33. Other changes to the existing road layout (such as a new roundabout, as depicted on the available masterplan / parameters plan) would have no impact on the heritage significance of the building or the way it is significances are experienced.
- 3.34. The agricultural character of the Site sits within a setting comprising a mixed tapestry of 21st century land-uses. While the agricultural use of the Site has had an historical association with the former use of the farmstead, the relationship is tenuous. There is no location within the landscape where the key significances of the building can be

experienced, while one is also (at the same time) able experience the existing character / land-use of the Site. Thus, the agricultural character of the Site is a very minor component of heritage significance, lying on the periphery of special architectural and historic interest. The development would bring a perceptible change in character to the Site; however, this would result in a barely perceptible or negligible degree of harm to heritage significance (and the experience thereof).

DRAFT

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. This report has found that the Site has the potential to contain later prehistoric activity, which has been observed in the land surrounding the Site.
- 4.3. There is the potential for Roman period remains to be within the Site as they have been identified in proximity to the Site.
- 4.4. The Site also holds the potential to contain remains associated with Howbury Ringwork and early medieval occupation in the wider area. However, it is likely that the Site would have made up part of the agricultural hinterland of any settlement, the remains of which would be of limited heritage significance, despite the proximity to Howbury Ringwork,. 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.
- 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 are unlikely to represent those of the highest significance such as Scheduled Monuments, all known and potential remains will require consideration as part of the planning process.

Built Heritage

- 4.6. The Site lies in proximity to Howbury Ringwork and trackway Scheduled Monument. Development within the Site will change the character of a component part of the setting of monument that does not play a meaningful role in its significance. It is possible that elements of new built form could be visible from the Ringwork. However, these changes would have no impact (cause no harm) to the heritage significance of the Ringwork.

-
- 4.7. Great Dairy Farm (Grade II Listed Building) has a historic association with the land within the Site, however the likely changes to the character of the Site would not result in harm to the significance of Great Dairy Farm or the way it is experienced.

DRAFT

5. REFERENCES

Bedfordshire Archaeology 1996 Volume 22

British Geological Survey 2022 Geology of Britain Viewer, 1:50,000 geological mapping, bedrock and superficial - <http://mapapps.bgs.ac.uk/geologyofbritain3d/index.html>

Historic England 2008 Conservation Principles, Policies and Guidance for the Sustainable Management of the Historic Environment

Historic England 2015 Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment

Historic England 2016 Historic England Advice Note 1: Conservation Area Designation, Appraisal and Management

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

Historic England 2019 Historic England Advice Note 12: Statements of Heritage Significance: Analysing Significance in Heritage Assets

Margary, I., D. 1973 Roman Roads in Britain. London: John Baker

Ministry of Housing, Communities and Local Government 2021 National Planning Policy Framework (NPPF); published July 2021

Northamptonshire Archaeology 2004 A421 Great Barford Bypass, Bedfordshire - Trial Trench Evaluation

OpenDomesday 2022 The Domesday Book <https://opendomesday.org/>

Planning (Listed Buildings and Conservation Areas) Act 1990 Act of UK Parliament

South Midlands Archaeology 1991 21 Willington Quarry p 11-12

The Rural Settlement of Roman Britain 2022 Map <https://archaeologydataservice.ac.uk/archives/view/romangl/map.html>

University of Nottingham 2022 Key to English Place-Names
<http://kepn.nottingham.ac.uk/map/place/Bedfordshire/Renhold>

Cartographic sources

1838	Tithe Map of Renhold
1891	1st Edition Ordnance Survey
1902	2nd Edition Ordnance Survey

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).

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, roovescape and skyline including important views within, into or out of heritage assets
- f. impact on open space which contributes positively to the character and/or appearance of heritage assets
- g. the positive benefits of the proposal in addressing heritage at risk.

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

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

viii. Where applications are permitted which will result in (total or partial) loss to a heritage asset's significance (including where preservation in situ of buried archaeological remains is not necessary or feasible), applicants will be required to arrange for further assessment of and recording of this significance in advance of, and where required, during development/works.

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

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

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’.

DRAFT

APPENDIX 2: GAZETTEER OF SELECTED RECORDED HERITAGE ASSETS

Ref	Description	Grade/Period	NGR	HE ref. HER ref.
A	Hengi-form monument 480m south of Dairy Farm	Scheduled Monument Neolithic	511157 250754	1015586
B	Henge, henge type monument and bowl barrow 500m south-east of Dairy Farm	Scheduled Monument Neolithic	511473 250850	1015587
C	Two bowl barrows 330m south of Dairy Farm	Scheduled Monument Bronze Age	511190 250900	1015589
D	Bowl barrow 550m south-east of Dairy Farm	Scheduled Monument Bronze Age	511405 350761	1015590
E	'The Docks' moated site and dock, Willington	Scheduled Monument Medieval	511306 250232	1012079
F	Howbury ringwork and medieval trackway	Scheduled Monument Medieval	510680 251290	1009627
G	Great Dairy Farm	Grade II 18th century	510450 251370	1114908
H	Fairfield Cottage	Grade II 17th and 18th century	510400 251320	1138234
J	Howbury Hall	Grade II 18th century	509810 251730	1138189
K	Ice House to Howbury Hall	Grade II 19th century	509860 251700	1138221
L	Stable Block to Howbury Hall	Grade II 18th century	509790 251780	1321202
M	Dairy and Laundry to Howbury Hall	Grade II 18th century	509850 251740	1311948
N	Garden Wall to Howbury Hall	Grade II 18th century	509920 251690	1321203
O	Dower Cottage	Grade II 18th century	509860 251785	1114907
P	52 Green End	Grade II 18th century	510220 252140	1311969
I	Hill Farmhouse	Grade II 18th and 19th century	510764 251200	1321205
1	Cropmarks indicating possible funerary activity	Neolithic to Bronze Age	511140 251130	MBB21997
2	Cropmark indicating the presence of a double ring ditch with a single causeway	Neolithic to Bronze Age	510700 250570	MBD14455
3	Features including ring ditches, and enclosure features	Neolithic to Bronze Age	510100 250500	MBD1478
4	Cropmark indicating the presence of a ring ditch and enclosure	Neolithic to Bronze Age	510800 250500	MBD16674
5	Cropmark indicating the presence of a ring ditch feature	Neolithic to Bronze Age	510140 250600	MBB22164
6	Early Prehistoric enclosure and occupational evidence	Neolithic to Iron Age	509800 250600	MBD337
7	Cropmarks indicating the presence of a round barrow cemetery	Bronze Age	512200 251800	MBD600
8	Cropmark indicated a ring ditch	Bronze Age	511020 251130	MBD15480
9	Cropmark indicating the presence of a ring ditch feature	Bronze Age	510430 250650	MBB22163

Ref	Description	Grade/Period	NGR	HE ref. HER ref.
10	Cropmarks indicating early prehistoric field system	Bronze Age	511390 250740	MBB21998
11	Cropmarks indicating the presence of ring ditches or barrow features	Bronze Age to Iron Age	512440 251460	MBB22013
12	Cropmarks indicating a possible barrow or hut circle	Bronze Age to Iron Age	511990 251120	MBB22015
13	Cropmarks indicating possible settlement	Bronze Age to Roman	510540 251990	MBB21995
14	Cropmarks indicating possible settlement	Bronze Age to Roman	510430 251710	MBB21996
15	Cropmarks indicating ring ditches and possible henge monuments	Prehistoric	511400 250800	MBD594
16	Enclosure feature	later prehistoric	510510 250470	MBD14457
17	Subrectangular enclosure feature	Iron Age	511750 251690	MBD9834
18	Cropmarks indicating the presence of a ditched boundary and ring ditch	Iron Age	511600 250000	MBD985
19	Iron Age Farm Settlement comprising domestic round houses within an enclosure	Iron Age	511250 252470	MBD18203
20	Iron Age settlement containing two enclosures a round house and a single cremation	Iron Age	511272 252627	MBD18688
21	Cropmarks indicating the presence of Iron Age settlement enclosures	Iron Age	510270 250720	MBB22165
22	Iron Age Farmstead - large double enclosure	Iron Age	510640 250630	MBD14451
23	Cropmark indicating an enclosure feature	Iron Age to Roman	511510 251680	MBB22006
24	Cropmark indicating a possible enclosure	Iron Age to Roman	511670 251770	MBB22007
25	Cropmark indicating a small Iron Age to Roman enclosure	Iron Age to Roman	511680 251640	MBB22008
26	Cropmarks indicating possible enclosure features	Iron Age to Roman	511680 251470	MBB22009
27	Cropmarks indicating a possible area of Iron Age to Roman Settlement	Iron Age to Roman	511960 251690	MBB22010
28	Cropmarks indicating a possible field system	Iron Age to Roman	512230 251820	MBB22011
29	Cropmarks indicative of settlement activity	Iron Age to Roman	512210 251960	MBB22012
30	Enclosure network	Iron Age to Roman	511300 251900	MBD15549
31	Cropmarks indicating a possible later prehistoric settlement	Iron Age to Roman	511000 251700	MBD1800
32	Inhumation grave of single adult in crouched position	Iron Age to Roman	511350 252722	MBD18689
33	Roman period enclosure feature	Roman	510900 252100	MBD15401
34	Site of Roman occupation	Roman	510600 250400	MBD14456
35	Roman period settlement evidence	Roman	510600 251600	MBD16675
36	Cropmarks indicating the presence of a small square ditched enclosure	Roman	510570 250410	MBB22524
37	Cropmarks indicating the presence of Roman field boundary's	Roman	510660 250450	MBB22525
38	Roman Road (Viatores no. 225)	Roman	511200 253050	MBD728

Ref	Description	Grade/Period	NGR	HE ref. HER ref.
39	Early to late medieval settlement activity	Early Medieval to Medieval	510378 251533	MBD18687
40	Medieval Settlement Evidence	Medieval	511408 252744	MBD18690
41	Cropmarks indicating the possible presence of medieval to post medieval field boundaries	Medieval to Post Medieval	512200 251300	MBB22016
Find Spots				
FS1	Flint Hand axe	Lower Palaeolithic	511000 250695	MBB21529
FS2	Roman Brooch	Roman	511000 252000	MBB19973
FS3	Roman coin	Roman	511950 251660	MBB19430
FS4	Roman coin	Roman	512025 251730	MBB19629, MBB19630, MBB19631
FS5	Medieval finger ring	Medieval	511910 251200	MBB20078
FS6	Medieval lead seal die	Medieval	510400 251900	MBD15971

Andover Office

Stanley House
Walworth Road
Andover
Hampshire
SP10 5LH

t: 01264 347630

Cirencester Office

Building 11
Cotswold Business Park
Cirencester
Gloucestershire
GL7 6BQ

t: 01285 771022

Milton Keynes Office

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

t: 01908 564660

Suffolk Office

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

t: 01449 900120

e: enquiries@cotswoldarchaeology.co.uk

