



ENGLISH HERITAGE

EAST OF ENGLAND

Clare Skeels – Senior Planning Officer
Planning Policy and Projects
North Hertfordshire District Council

Our ref: HD/P 5255
Your ref:
Telephone 01223 582775

By email only

6 February 2015

Dear Ms Skeels

North Hertfordshire Local Plan 2011-2031: Preferred Options and Revised Statement of Community Involvement.

Thank you for your letter dated 16 December consulting English Heritage on the above two documents. We have no comments to make on the revised Statement of Community Involvement (other than to note our continuing statutory role in plan-making and applicable development management cases). In terms of the Local Plan, we have a number of comments to make on policies and sites as follows:

Chapter 2: Vision and Objectives

Figure 1

2.1 We welcome the reference to the historic environment within Figure 1.

Chapter 3: Economy and Town Centres

Policy ETC6: Town and Local Centres

The town centres of North Hertfordshire are important in terms of the quality and extent of heritage assets, with large conservation areas and a multitude of listed buildings and archaeological sites, plus registered parks and gardens in the case of Letchworth. The local centres are also important for similar reasons, albeit on a smaller scale. As part of the Local Plan's positive strategy for the historic environment as required by Paragraph 126 of the National Planning Policy Framework (NPPF), the approach to the district's town and local centres should seek to conserve and enhance heritage assets. We note and welcome the final sentence of Policy ETC6 which requires proposals to be appropriate to the historic and architectural character of the town and local centres.

This chapter lacks detail of any regeneration opportunities within the town centre relating to retail, leisure and/or commercial activities (chapter 12 only deals with some housing and employment sites in the town centres). There is a role for the Local Plan to outline aspirations for specific sites, which could help to conserve,

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enhance and restore the historic environment. For example, clarity regarding the Churchgate shopping centre in Hitchin would be beneficial. In line with our previous advice (including an Urban Panel visit in 2011), we regard this site as a key opportunity to reinforce and repair the historic character of the town centre.

Chapter 4: Countryside and Green Belt

Policy CGB5: Countryside and Green Belt – existing rural buildings

We recommend that the opening paragraph of this policy is amended to reflect the need to ensure that the significance of historic farm buildings is conserved in any conversion scheme. We suggest the following is included after the first sentence:

'Where buildings are of historic significance, the conversion should ensure that this significance is not harmed and that the setting of the building is respected.'

Chapter 6: Housing and Development Strategy

Policy HDS6: Gypsies, Travellers and Travelling Show people

Part 3, amend to include a reference to potential impact on heritage assets:

'...or on features of biodiversity importance or heritage significance'

Chapter 7: Design

Policy D1: Design and Sustainability

In order to reflect paras 58, 60 and 61 of the NPPF more closely we recommend a reference to the historic environment in this policy. For instance:

Part 1, amend to read – *'respond positively to the site's local context, including the natural and historic environment'*

Chapter 8: Healthy Communities

Policy HC1: Community, leisure, recreation and cultural facilities

To align this with the NPPF (para 61) we recommend that part 4 is amended to read: *'there are no unacceptable impacts on biodiversity, geodiversity, landscape, heritage assets or ability to enjoy the natural or historic environment.'*

Chapter 9: Natural Environment

Policy NE1: Landscape and Environmental Protection

The historic dimension of the landscape cannot be separated from the natural aspects given that the landscape has been shaped by man over centuries. The final sentence of this policy could be amended to read:

'Development proposals that would be detrimental to the natural and historic environment will be refused ...'

Policy NE4: Renewable energy development, p60

In order to align the terminology of this policy with that of the NPPF we suggest that part 2 is amended to read *'environmental quality and heritage assets'*

Policy NE6 Reducing Flood Risk

To ensure that essential details are agreed early in the planning process where they have a bearing on environmental considerations, we suggest that the fourth paragraph should begin: *'Developers will be required to show as part of their planning applications that any flood protection ...'*. Within the same paragraph, we request that a reference is included to heritage assets alongside nature conservation and landscape impacts. This is because drainage solutions may affect heritage assets through physical change and changes to the water table. Below ground archaeology is particularly vulnerable. We suggest the following amendment : *'...which may be necessary do not have an unacceptable impact on nature conservation, heritage assets, landscape and recreation.'*

Policy NE9 Contaminated Land

Contaminated land or buildings may include significant industrial archaeology and other historic fabric that should be retained. We recommend that the policy is clearer in terms of the potential need for conservation of environmental assets within development site and suggest the following amendments:

- In the third paragraph, amend to read *'...as part of a planning application. This should include assessment of the natural and historic environment within the site, and how such assets may be conserved, as appropriate.'*
- In the final sentence, amend to align with the wording in para 61 of the NPPF, as follows: *'Receptors may include human beings, the historic, built and natural environment, including controlled waters'*.

Chapter 10: Historic Environment

We welcome the active approach to the conservation of the district's historic environment set out in this chapter. This takes forward the positive requirement of the NPPF in para 126 and 157 that local plans should contain a clear strategy for enhancing the historic environment.

The reference to Heritage Risk is helpful, and we support the continued updating of the Council's own record of listed buildings at risk. It would be suitable to refer to English Heritage's 2014 national register, and the current entries. The question of enabling development is a difficult one as, by definition, this is exceptional planning policy. We suggest that reference in the plan in para 10.6 is not necessary, and could raise expectations where the circumstances do not merit this approach.

We note that the local plan does not seek to re-state the policies of the NPPF adapted for local circumstances. While we agree that repetition is not needed, you may wish to consider if, for development management purposes, it would be helpful to provide some further coverage. We suggest that any additional coverage would also draw on the Planning Policy Guidance (PPG), to make it accessible to users of the plan.

Within policy HE1 we consider that the positive requirement for conservation and enhancement should be reflected more clearly as the starting point. The historic environment is among environmental matters that must be considered when pursuing sustainable development (para 7, NPPF). The NPPF also refers in para 8 to achieving economic, social and environmental gains jointly. Therefore, a clear steer to this positive starting point at the beginning of policy HE1 would be appropriate.

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The justification for harm to heritage assets should also be more closely aligned to the NPPF, para 132, and it should be noted that where the setting of a heritage asset is part of its significance, harm should also be carefully assessed and weighed against public benefit.

Policy HE1 could also include reference to measures that could actively promote conservation of the historic environment such as the use of planning obligations, where appropriate. See also the comments on policy ID1 below.

English Heritage has commented during the evolution of Policy HE1 and we would be pleased to comment further prior to the next stage of the plan.

Chapter 11: Infrastructure and Delivery

Policy ID1, and paras 11.9 and 1.10 Developer contributions

The potential for developer contributions to be applied to the conservation and enhancement of the historic environment should be referred to in the policy and supporting text, as part of a positive strategy for conservation and enhancement of the historic environment. This might be applicable, for instance, to sites containing heritage assets at risk, whose repair could be secured through a s106 agreement alongside new development.

Policy ID2 Masterplans

We support the Council's proposal to prepare masterplans for key sites, and the reference to the historic environment within the matters to be covered. The character of North Hertfordshire's settlements needs very careful consideration in the preparation of these masterplans, and assessment should not be limited simply to the characteristics of the land to be developed. While masterplans may not be necessary for smaller sites, this does not avoid the need for site specific guidance within the Local Plan (see our comments for Chapter 12).

Chapter 12: Communities

As with previous consultations, due to time and resource constraints we have not been able to assess every site in great detail. Our comments on the sites have been based mainly on desk-top analysis, and we have not been able to judge the potential impacts more accurately on the ground. Even with the strategic sites, we have only been able to carry out rapid site visits and have not had the opportunity to ascertain precise impacts. We have focussed on those sites with the potential for the greatest historic environment impact. This does not mean there are no issues with any other site and we reserve the right to comment further on any site as and when proposals develop.

Please note that we have not considered areas of archaeological interest beyond scheduled monuments in most cases, nor have we looked at historic landscape issues beyond registered historic parks & gardens. However, wider archaeological and landscape impacts are important considerations and need to be factored into site assessment. The possible cumulative impact of a number of site allocations in one location could cause significant harm to the historic landscape. Advice from conservation and archaeological staff at district and county levels should be sought,

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along with consultation of the County Historic Environment Record (HER) for specific heritage assets.

As noted in our earlier Local Plan comments dated 28 March 2013, with a number of preferred sites it is difficult to ascertain the scale of possible impact on heritage assets given the vagueness of the proposed use and the lack of information on how each site might be developed. The specifics of the final use and design may affect our opinion on the suitability of several site allocations, and we suggest that more information is included for sites at the next and final consultation stage. Site-specific policy requirements should be included as a matter of course in the Local Plan, while development briefs may also be advantageous for a number of sites. The NPPF and the PPG states that a Local Plan should make clear what is intended to happen in the area over the life of the plan, where and when this will occur and how it will be delivered. The PPG specifically states that “where sites are proposed for allocation, sufficient detail should be given to provide clarity to developers, local communities and other interests about the nature and scale of development (addressing the ‘what, where, when and how’ questions)”.¹

Chapter 12 Part 1: Development for North Hertfordshire’s own needs

Ashwell

Paragraph 12.5 outlines many of Ashwell’s key heritage assets, although does not mention anything in relation to archaeology or consider the surrounding countryside. There are a number of listed buildings in the countryside around Ashwell (including the Grade II* Bluegates Farmhouse), and several scheduled monuments including Arbury Banks Iron Age hill fort to the south-west of the village.

In terms of the proposed housing site allocation **AS1 (Land west of Claybush Road)**, we have some concerns regarding potential impacts on the significance of Arbury Banks scheduled monument. The site is currently in arable cultivation and is located to the rear of properties on Claybush Road, a number of which are visible on the horizon when viewed from Arbury Banks. The site drops away to the west and the terrain is gently undulating between the site and Arbury Banks. The northern two thirds of its western boundary is quite well screened by field boundary planting, though this is absent at the southern end.

Even if development worked with the existing topography and was of a modest scale, it is likely that at least some of it would be visible from the monument based on the nature of the existing landscape. Without further detail regarding layout, density, building heights and so on, we cannot as yet confirm that development would not have a more than slight impact on the setting of the monument or cause more than minor harm to its significance. It should also be noted that there are prominent views of St Mary’s Church from footpaths and byways approaching Ashwell from the south. While this site would not obscure such views, it could detract by virtue of its location and topography.

Based on the above issues, we therefore advise that if there are other sites put forward which do not impact on heritage assets, these should be preferred.

¹ PPG Reference ID: 12-010-20140306 (last revised 06/03/2014)

Baldock

We welcome the information in the introduction providing an overview of the historic evolution of the settlement, and the section on heritage. As with other settlements, we would like to see the heritage assets of the town shown on the policies map alongside the proposed site allocations.

The importance of the town in Roman times means that appropriate archaeological evaluation of the proposed development sites is necessary prior to the site allocation being finalised. If areas of sensitivity are identified these may need field evaluation, and reveal areas where no development would be suitable, or where open space should be sited.

As advised previously, we have concerns regarding **Site BA1 (Blackhorse Farm)** due to its size and potential impact on the historic character of Baldock. There is a need for very careful assessment of how the development would be integrated into the town without harm to its character – this should include the extent to which facilities such as retail should be provided in the new development, and the effect this might have on the town centre.

It is not clear whether there has been adequate assessment of heritage impacts (the LUC study in 2013 was lacking in this respect), and we again recommend that such assessment occurs. Allocation of the site needs to be justified in terms of historic environment impact.

Such impacts could be mitigated to a degree by high quality urban design. Views towards St Mary's Church are of special concern, and we would expect these to be a key consideration within the master planning of the development. This will not only assist in maintaining a high quality environment but also promote a sense of identity. It is important that this new development relates functionally to Baldock, rather than promoting a separate entity. We note that para 12.16 refers to the matter of integration, but does not make explicit reference to heritage assets. We recommend that para 12.16 should refer to:

- measures to mitigate any impacts on archaeology and the settings of heritage assets
- positive integration of views towards St Mary's church within the proposed layout

As advised previously, **Sites BA2, BA3 and BA5** border a large scheduled monument (the Romano-British settlement of Baldock) and raise concerns in terms of impact on its significance. The setting of the monument could be greatly affected by the scale of the development. There needs to be proper assessment of significance and the archaeological issues arising from any proposed development. Allocation of these sites needs to be justified in terms of historic environment impact. If the sites are taken forward to the next consultation stage, there would need to be site specific criteria to guide development.

We have no objections to the allocation and development of **Site BA6 (Land at Icknield Way)**, providing that the significance and setting of the adjoining Baldock Conservation Area is safeguarded. There should be site specific criteria at the next consultation stage to guide development.

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Site BA9 (Adjoining Raban Court) and **Site BA8 (Works, Station Road)** provide an important opportunity to enhance the setting of the listed building (Raban Court, grade II) on the corner of Station Road and Royston Road. In view of the reduction in traffic resulting from the completion of the Baldock bypass, it would be appropriate to consider whether the listed building could be given greater protection by wider pavements on both road frontages. The road widening on the opposite corner, associated with Magdelene Court may also provide some leeway. This is a prominent building and its long-term protection should be given careful consideration, as opportunities arise. Development to the north-east side within BA9 should respect the setting of this building. There should be site specific criteria at the next consultation stage to guide development.

Codicote

Site CD2 (Codicote Garden Centre) lies to the west of the Grade II* listed Church of St Giles, with the potential for impact on the church's significance through change within its setting. This should be assessed to ascertain the level of impact. If there is impact, and if the site is taken forward to the next consultation stage, there would need to be site specific criteria to guide development.

Site CD3 (Land north of The Close) lies to the south of the Grade II* listed The Bury. We have previously advised (in February 2013) that there needs to be an assessment to judge whether there is an impact on the significance of this listed building through change within its setting. It is not clear whether this assessment has been carried out. If there is impact, and if the site is taken forward to the next consultation stage, there would need to be site specific criteria to guide development.

Graveley

Site GR1 (Land at Milksey Lane) lies partly within Graveley Conservation Area. Although reduced in size from previous consultations, it could still have a notable impact on the significance of the conservation area (the Sustainability Appraisal picks up on this). Allocation of the site needs to be justified in terms of historic environment impact. If the site is taken forward to the next consultation stage, there would need to be site specific criteria to guide development.

Great Ashby and North-East of Stevenage

We have previously commented on Sites GA1 and GA2 in our response of February 2013. Both sites formed part of a larger North East of Stevenage in the 2013 consultation, where we expressed considerable concerns about the potential impact on the historic environment (including historic landscape character, Chesfield Church and Park and Weston Park). The reduced size of both sites will address some of these concerns, but we still have a number of issues as follows:

Site GA1 (Land at Roundwood) lies a short distance (c.350m) to the east of the scheduled and Grade II* listed remains of Chesfield Church at Manor Farm, which includes other listed buildings. We note that this site is subject to a planning application (ref 10/00583/1) for up to 360 homes which was first received in March 2010 but remains undetermined. It would appear that English Heritage has not been consulted on this application, which is surprising given the proximity of the above heritage assets. Development of this site is likely to have a notable impact on the

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significance of these heritage assets through change within their setting. There is a strong rural setting to these heritage assets despite the proximity of Great Ashby, and there would be an erosion of this setting through housing development. It is not clear whether there has been adequate assessment of heritage impacts, and we therefore recommend that such assessment occurs. Allocation of the site needs to be justified in terms of historic environment impact. If the site is taken forward to the next consultation stage, there would need to be site specific criteria to guide development.

We would also welcome the opportunity to comment on the planning application, and will be in contact with your development control colleagues shortly.

Site GA2 (Land off Mendip Way) immediately adjoins a number of Grade II listed buildings at Tilekiln Farm, and potentially also impact on historic landscape character. There will be impact on the significance of the listed buildings through change within their setting, as their rural character is eroded. It is not clear whether there has been adequate assessment of heritage impacts, and we therefore recommend that such assessment occurs. Allocation of the site needs to be justified in terms of historic environment impact. If the site is taken forward to the next consultation stage, there would need to be site specific criteria to guide development.

We assume that access to both sites would occur through the existing Great Ashby area. The 2013 consultation suggested a major new access from the A1(M) for the larger site area, and we expressed concerns in our response in terms of heritage impacts.

Hitchin

We have no comments on any of the preferred housing sites and note that no new employment sites are proposed. There is no discussion of town centre issues and retail sites (see above) and it is not clear what is intended in this part of Hitchin. The centre of Hitchin is rich in heritage assets, but also has a number of potential redevelopment sites which offer opportunities to conserve and enhance the historic environment. We have provided extensive comments on Churchgate in previous correspondence including the 2013 consultation, but there is no detail on the future of this site.

Ickleford

As advised previously, **Site IC1 (Duncots Close)** has the potential to impact on the significance and the setting of Ickleford Conservation Area, particularly given its position as a green and open site on the edge of the conservation area. Allocation of the site needs to be justified in terms of historic environment impact. If the site is taken forward to the next consultation stage, there would need to be site specific criteria to guide development.

Kimpton

As advised previously, **Site KM3 (Land north of High Street)** adjoins Kimpton Bottom Conservation Area and has the potential to impact on the significance and setting of the conservation area, particularly given its position as a green and open site on the edge of built development. Allocation of the site needs to be justified in

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terms of historic environment impact. If the site is taken forward to the next consultation stage, there would need to be site specific criteria to guide development.

Knebworth

As advised previously, **Sites KB1 (Land at Deards End)** and **Site KB2 (Land off Gypsy Lane)** have the potential to harm the significance and setting of the two conservation areas within Knebworth given their overall size. However, much will depend on the final design, which suggests the need for a development brief/s. Another issue is the scheduled 19th century railway bridge off Stevenage Road on the northern edge of the settlement. Works to the deck have been undertaken in recent years, although the increased amount and weight of traffic (including construction vehicles) might need to be explored. Allocation of these sites needs to be justified in terms of historic environment impact. If the sites are taken forward to the next consultation stage, there would need to be site specific criteria to guide development.

Letchworth

We have previously expressed some concerns with **Site LG1 (Land north of Letchworth)** in terms of impact on the historic environment (our February 2013 response). We raised concerns about the setting of two conservation areas (Croft Lane and Norton) and the setting of two scheduled monument at Rodwell Lodge. We also expressed some reservations about the further enlargement of Letchworth, which weakens its original Garden City qualities as a compact settlement.

It is not clear whether there has been adequate assessment of heritage impacts (the LUC study in 2013 was lacking in this respect), and we again recommend that such assessment occurs. Allocation of the site needs to be justified in terms of historic environment impact.

We note that a masterplan is required for this site, with paragraph 12.137 setting out the things the masterplan should consider. There is no reference to the historic environment, despite the potential impacts outline above. We therefore recommend that reference to the historic environment is included in this paragraph in order for the masterplan to address such issues.

As advised previously, **Site LG3 (Land east of Talbot Way)** adjoins Norton Conservation Area, so any redevelopment would need to conserve the significance of this heritage asset and nearby listed buildings. Allocation of the site needs to be justified in terms of historic environment impact. If the site is taken forward to the next consultation stage, there would need to be site specific criteria to guide development. A development brief may also be appropriate to guide proposals, particularly given the scale of potential development.

As advised previously, **Site LG4 (Land north of former Norton School)** adjoins Letchworth Conservation Area with access through the Croft Lane Conservation Area, so any redevelopment would need to conserve the significance of these heritage assets. Allocation of the site needs to be justified in terms of historic environment impact. If the site is taken forward to the next consultation stage, there would need to be site specific criteria to guide development.

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Site LG5 (Land at Birds Hill) adjoins Letchworth Conservation Area, so any redevelopment would need to conserve the significance of this heritage asset. The site may also contain buildings of historic and/or architectural interest, which may be desirable to retain. Allocation of the site needs to be justified in terms of historic environment impact. If the site is taken forward to the next consultation stage, there would need to be site specific criteria to guide development.

Site LG7 (Former Gates Garage, Station Road) is situated within Letchworth Conservation Area, so any redevelopment would need to conserve the significance of this heritage asset as advised previously. The building does not appear to make a positive contribution to the conservation area, at least in terms of its frontage, so its loss should present the opportunity to provide enhancements to this part of the conservation area. If the site is taken forward to the next consultation stage, there would need to be site specific criteria to guide development.

Site LG10 (Former Norton School Playing Field, Croft Lane) adjoins and partly lies within Croft Lane Conservation Area, so any redevelopment would need to conserve the significance of this heritage asset and nearby listed buildings, bearing in mind that access would occur through the conservation area. Allocation of the site needs to be justified in terms of historic environment impact. If the site is taken forward to the next consultation stage, there would need to be site specific criteria to guide development.

Site LG11 (Garden Square Shopping Centre) appears to be a new site not included in previous consultations. The existing shopping centre is limited architectural interest and does not make a very strong contribution to the significance of Letchworth Conservation Area. It is not clear from the consultation document whether the shopping centre would be redeveloped in its entirety, or whether the intention is to accommodate 45 housing units into the existing centre. In the case of the former, this would offer a real opportunity to enhance this part of the conservation area. In the case of the latter, we would want to ensure that any alterations to the shopping centre were sympathetic to the conservation area. If the site is taken forward to the next consultation stage, there would need to be site specific criteria to guide development.

Offley

Site OF1 (Former Allotments, Luton Road) appears to be the combination of Sites O/r1 and O/r2 from the 2013 consultation. The site is partly situated within Offley Conservation Area, with the allotments providing important open space within the setting of the conservation area. As advised previously, the site has the potential to impact on the significance and setting of the conservation area and other heritage assets. Allocation of the site needs to be justified in terms of historic environment impact. If the site is taken forward to the next consultation stage, there would need to be site specific criteria to guide development.

Pirton

While paragraph 12.169 refers to Pirton Conservation Area and prominent historic buildings, there is no reference to the two scheduled monuments within the village which underline Pirton's status as a complex medieval settlement. We have expressed concerns in our previous 2013 comments that the number of dwellings

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proposed for Pirton seems excessive and out of keeping with the existing village. The overall number of proposed dwellings is broadly the same as before, albeit divided between two sites rather than just one.

In 2013, we expressed concerns with Site 64 given its location next to the conservation area, a number of listed buildings and the scheduled moated site next to Rectory Farm. **Site PT1 (Land east of Priors Hill)** is a reduced version of Site 64, presumably to address some of the concerns we raised previously. However, it remains a large site proposed for 88 dwellings and is still likely to have a detrimental impact on the significance of several heritage assets through change within their setting. There are still wider archaeological issues given the historic importance of the village, with the need to establish the archaeological potential of this site. As advised before, the impact of development on the historic environment should be assessed before this site is taken forward. We remain concerned regarding the potential impacts and suitability of this allocation until further information has been produced. Allocation of the site needs to be justified in terms of historic environment impact. If the site is taken forward to the next consultation stage, there would need to be site specific criteria to guide development.

In comparison, **Site PT2 (Holwell Turn, West Lane)** would seem to be less problematic in terms of impact on designated heritage assets, although it lies a short distance to the east of the conservation area. As advised previously, the impact of development on the historic environment should be assessed before this site is taken forward. The archaeological potential of the site would also need to be established.

Preston

Site PR1 (Land off Templars Lane) appears less problematic in terms of impact on designated heritage assets than other sites that have previously been consulted upon for Preston (see comments from 2013 and earlier). It adjoins a Grade II listed building and lies near to the conservation area, so care will need to be taken in terms of impact on its significance. If the site is taken forward to the next consultation stage, there would need to be site specific criteria to guide development.

Reed

As advised previously, **Site RD2 (Farmyard, Brickyard Lane)** could have an impact on the significance and setting of Reed Conservation Area. The site is within the conservation area boundary, presumably drawn deliberately to include this site as part of the conservation area's significance. Reed also contains a very high number of moated farmsteads with associated water management and field systems, with a number of these features scheduled, highlighting the archaeological potential of this site. The impact of development on the historic environment should be assessed before this site is taken forward. We remain concerned regarding the potential impacts and suitability of this allocation until further information has been produced. Allocation of the site needs to be justified in terms of historic environment impact. If the site is taken forward to the next consultation stage, there would need to be site specific criteria to guide development.

Royston

While there are two paragraphs helpfully outlining the heritage of Royston (12.189 and 12.190), there is no reference to its archaeological interest. Therfield Heath is

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referred to as an important open space and biodiversity asset in paragraph 12.187, but there is no acknowledgement of its historic and archaeological importance. There are several scheduled monuments on the heath (pre-historic barrows) which overlook **Site RY1 (Land west of Ivy Farm)** from their higher vantage point. Our previous advice expressed concerns about impact on the significance of the scheduled monuments (as well as potential on-site archaeology issues). The monuments currently enjoy a largely rural setting to the north, with the urban edge of Royston stopping at Ivy Farm. Notwithstanding the railway line and A505, the monuments have expansive views into the Cambridgeshire countryside, which helps to reinforce their significance. The heath and countryside beyond is also prominent as one travels north from the village of Therfield. We therefore consider that development of Site RY1 would be very harmful to the monuments, and recommend that the housing numbers are provided elsewhere.

St Paul's Walden

As advised previously, **Site SP1 (Land south of High Street, Whitwell)** could have a considerable impact on the significance and setting of many heritage assets, with an adjoining conservation area and numerous listed buildings along the High Street. There are historic parks & gardens to the north and south in the form of St Paul's Walden Bury (Grade 1) and The Hoo, Kimpton (Grade II) respectively. Given the topography, development could have a considerable effect on view to and from these parks & gardens. The impact of development on the historic environment should be assessed before this site is taken forward. We remain concerned regarding the potential impacts and suitability of this allocation until further information has been produced. Allocation of the site needs to be justified in terms of historic environment impact. If the site is taken forward to the next consultation stage, there would need to be site specific criteria to guide development.

Stevenage North

As advised previously, we have concerns regarding this proposed strategic site in terms of impact on the historic environment. We note that the site could only proceed if the adjoining land to the south within Stevenage Borough were also included, and so we have assessed the impacts on this basis. It is not clear how much land to the south would be included, but there is a large conservation area on the Stevenage side (St Nicholas and Rectory Lane Conservation Area).

We would certainly resist any development within the conservation area, which has been designated, in part, to protect the land that inspired work by the author E.M. Forster. It also forms part of the setting of Rook's Nest House, a Grade I listed building that is featured in Forster's novel, *Howard's End*. There are views from this listed building across the conservation area and countryside to the west, as well as views from other listed buildings along Weston Road. Such views form a key part of the significance of the listed buildings and the conservation area, particularly as views to the east have been compromised by the Great Ashby housing estate. Even if there is to be no development within the conservation area, care will need to be taken to avoid harmful development on the land beyond (i.e. to the north and west of the footpath).

To the north of the strategic site is Graveley Conservation Area, which covers the majority of the village and includes the Grade I listed Church of St Mary and other

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listed buildings. Again, care would need to be taken to avoid development within the strategic site detracting from the significance and setting of these heritage assets, bearing in mind that views of St Mary's can be seen from the road between Chesfield Park and Graveley.

The impact on Chesfield Park to the east, an undesignated but historic parkland with the scheduled and Grade II* listed remains of Chesfield Church to the north-east, will need to be considered. There may be opportunities for the historic parkland with the development of the proposed country park, such as improved access, interpretation and conservation of this heritage asset.

It is not clear whether there has been adequate assessment of heritage impacts, and we therefore recommend that such assessment occurs. Allocation of the site needs to be justified in terms of historic environment impact. As before, we recommend that further work is undertaken to identify and where possible, overcome potential historic environment issues, which includes a proper assessment of, and potential impacts on, the significance of heritage assets.

We note that a masterplan is required for this site and adjoining land to the south, and it is helpful that paragraph 12.221 refers to some of the above heritage assets. The paragraph should go further though and clarify that the significance of heritage assets needs to be conserved, including views to and from these assets.

Therfield

As advised previously, **Sites TH1 (Land at Police Row)** and **TH2 (Land south of Kelshall Road)** are similarly in close proximity to the scheduled motte and bailey castle and lie close to the historic settlement core. They should be regarded as having archaeological potential for medieval settlement remains whose character and significance would need to be established.

Both sites also adjoin Therfield Conservation Area and would affect its setting. In the case of Site TH1, there is an opportunity to enhance the existing site in a sensitive way to act as the entrance to the conservation area, and there should be site specific criteria at the next consultation stage to guide development.

Site TH2 has been considerably reduced in size since the 2013 consultation, but still has the potential to harm the significance and setting of the conservation area and the surrounding countryside, as well as the Grade II* listed The Old Rectory to the west. It is worth noting that the conservation area covers virtually the entire settlement of Therfield, suggesting a cohesive historic character. As before, the impact of development on the historic environment should be assessed before this site is taken forward. We remain concerned regarding the potential impacts and suitability of this allocation until further information has been produced. Allocation of the site needs to be justified in terms of historic environment impact. If the site is taken forward to the next consultation stage, there would need to be site specific criteria to guide development.

Wymondley

In our response to the two housing options consultations in February and July 2013, we expressed considerable concerns about the potential scale of development at

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Little Wymondley and its impact on the significance and setting of several listed buildings. **Site WY1 (Land south of Little Wymondley)** is a reduced version of Site 232 consulted on in July 2013, which itself was a reduced version of Site 122 consulted in February 2013. On both occasions we highlighted the likely impact on listed buildings including the Grade II* Wymondley House to the north as well as the Grade I Wymondley Bury and Grade II* St Mary the Virgin Church to the east.

Site WY1 is only slightly smaller than Site 232. The site continues to wrap around Wymondley House and a number of Grade II buildings and could have considerable impacts on significance. There may also still be impacts on Wymondley Bury and the church depending on topography, landscaping and building design. As before, we strongly recommend that further work is undertaken to identify and where possible, overcome potential historic environment issues. We have reservations about taking this site forward without further analysis and justification of the impacts and may object to its inclusion at the next consultation stage.

Chapter 12: Part II: Development for Wider Needs of Luton

Cockernhoe and East of Luton

The combined size and scale of the three preferred housing sites on the edge of Luton (**Site EL1: Wandon Park, Site EL2: Wandon Park Extension and Site EL3: West of Cockernhoe**) represent a considerable development area of over 2,000 dwellings which would have a marked impact on the historic environment. In our 2013 responses, and comments on planning applications and earlier plan consultations, we raised concerns about impact on specific heritage assets as well as historic landscape character.

Sites EL1 and EL2 are broadly the same site area as the February 2013 consultation known as East of Luton (and follow similar boundaries to the related planning application). Our consultation response highlighted the need to preserve archaeology and historic landscape features, including Brickkiln Wood (subject of an English Heritage research report). We also drew attention to the proximity of the Grade II registered historic park & garden of Putteridge Bury to the north and the setting of a number of Grade II listed buildings.

Site EL3 is the same site area as the July 2013 consultation known as Site 212A. It lies within 300 metres of Putteridge Bury and in conjunction with Sites EL1 and EL2 would effectively surround the village of Cockernhoe. In our consultation response we expressed particular concerns about the impact on Putteridge Bury and the urbanisation of its southern boundary. While there is a buffer of c.300m, these concerns remain.

The proposed masterplan for these sites, as outlined in paragraph 12.251, refers to minimising visual impact on the historic parts of Cockernhoe, although it is not clear what this means or whether it really can be achieved given the scale of development. There is no reference in this paragraph to addressing impacts on Putteridge Bury which would need to occur. As before, we strongly recommend that further work is undertaken to identify and, where possible, overcome potential historic environment issues. We have reservations about taking these three sites forward without further

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analysis and justification of the impacts and may object to their combined inclusion at the next consultation stage.

Chapter 12: Part III: Reserved Sites for Future Needs

West of the A1(M) at Stevenage

We note that this site is not intended for allocation or development within this plan period, but may come forward in the future to meet Stevenage's development needs. We have previously expressed some concerns on **Site WS1 (West of Stevenage)** in terms of impact on the historic environment. The site does not contain any designated heritage assets, although could affect the setting of a number of listed buildings near to the boundaries. In particular, this includes the Grade I listed Almshoe Bury and the Grade II* farmhouse at Dyes Farm, although there are several Grade II listed buildings too. Symmonds Green Conservation Area is to the east, although on the eastern side of the A1(M).

As before, we recommend that further work is undertaken to identify and where possible, overcome potential historic environment issues, which includes a proper assessment of, and potential impacts on, the significance of heritage assets. The proposed masterplan as outlined in paragraph 12.257 does not refer to addressing impacts on the historic environment; given the proximity of heritage assets such as Almshoe Bury, we strongly recommend that such issues are addressed.

We hope that the above comments are of assistance. If you have any queries or would like to discuss specific points, please do not hesitate to contact me.

Yours sincerely



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