

# Development Management

## Central Bedfordshire Council

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## MEMORANDUM

<b>From :</b>  Martin Oake Archaeologist		<b>To :</b>  Alex Harrison Principal Planning Officer	
<b>Please Contact :</b>  Martin Oake	<b>Our Reference :</b>  <b>CB/15/03078/REG3</b>	<b>Your Reference :</b>	<b>Date :</b>  17 December 2015

**Application No:** CB/15/03078/REG3  
**Location:** Stratton Business Park, Pegasus Drive, Biggleswade  
**Proposal:** Outline: B1, B2 & B8 use employment development with associated infrastructure and ancillary works; all matters reserved except means of access

Archaeology Reference: HER/16159/MKO

Thank you for the opportunity to comment on this application. My comments are based on the original application and the later amendments, in particular plans 17377-SK1010K (revised site layout) and B1400.401 (revised advanced planting).

Prior to the application the proposed development site was known to contain a ring ditch, the remains of a Bronze Age funerary monument (HER 16159) at the northern end of the site and evidence of Iron Age settlement at its southern end (HER 16157); these are heritage assets with archaeological interest as defined by the *National Planning Policy Framework (NPPF)*. Immediately to the north of Dunton Lane is Stratton Park moated enclosure and associated manorial earthworks (HER 520). This site is a Scheduled Monument (National Heritage List for England Number 1012161) and a designated heritage asset of the highest significance (*NPPF paragraph 132*). The setting of a designated heritage asset forms part of its significance and any development within that setting will have an impact on the significance of the designated asset.

The site is also located in an extensive archaeological landscape containing sites and features dating from the prehistoric to post-medieval periods. This landscape includes evidence of later prehistoric and Roman settlement and field systems (HERs 13956, 15327,

16158,16823, 16824 and 18284), remains of Saxon and medieval settlement (HERs 518 and 17738) and field systems (HER 17786) and post-medieval activity (HER 16162). The proposed development site has the potential to contain previously unidentified archaeological remains relating to the identified in the surrounding area.

The application contains a *Heritage Statement* (Albion Archaeology, August 2015) which includes the results of an archaeological field evaluation of the proposed development site, comprising a geophysical survey and a programme of trial trenching, and a consideration of the impact of the proposal on the setting of the Stratton Park Moat Scheduled Monument. The impact of the proposed development is also dealt with in the *Design and Access Statement* (Woods Hardwick, August 2015 as revised in November 2015) and the *Planning Support Statement* (Woods Hardwick, July 2015).

*The proposed development will have an impact on:*

The setting of the Stratton Park Moat and associated earthworks Scheduled Monument

The buried archaeological remains within the proposed development.

This is an application for outline planning permission with all matters reserved except for access and so details of the proposed development are necessarily limited. As a consequence it is difficult to assess the impact of the proposal on both the setting of the Scheduled Monument and buried archaeological remains. The intent of the application is to "...provide a framework within which future occupiers can submit reserved matters applications for individual parcels". The detailed development will be left to the dictates of market requirements and will be dependent on the specific requirements of the businesses that occupies each individual plot. It is, therefore, only possible to assess the impact of the proposal on the designated heritage asset and heritage assets with archaeological interest in general terms. There is a particular difficulty in assessing the impact on the setting of the Stratton Park Moat Scheduled Monument without details of the scale and nature of the buildings and structures that will occupy the site.

### **Setting of the Stratton Park Moat Scheduled Monument**

The Scheduled Monument comprises a square moated enclosure of medieval date at the western end of the monument, probably a manorial residence (McOmish et al 2009), with a "...complex network of hollow-ways, fields and platforms..." (<https://www.historicengland.org.uk/listing/the-list/list-entry/1012161>) surviving as earthworks to the east of the moated enclosure; these earthworks have been interpreted as the remains of contemporary manorial outworks. The Scheduled Monument originally formed part of a "...complex and dynamic landscape that included elements contemporary and earlier settlement", it would have been "...embedded within in a network of settlement, trackways and fields..." of which the earthworks to the east of the moat are a surviving fragment (McOmish et al 2009, 29). It has been suggested that the moated enclosure was located to take advantage of a slight natural ridge, with the moat towards the highest point of the ridge. This means that the "...moat is highly visible and overlooks the ground to the east" (McOmish et al 2009, 29).

As described above, the setting of the Scheduled Monument when it was in use would have been complex. To the north and north west it would have been dominated by the contemporary settlement of Stratton (HER 518), the site of which is now largely occupied by the Stratton housing development, there is also evidence that there was some further contemporary settlement to the east (HER 17738). The rest of the Monument's setting

would have consisted of an extensive and open agricultural landscape comprising a palimpsest of fields, trackways and woodlands.

The modern landscape reflects the extensive changes to the settlement pattern and cultivation practices since the moat was occupied but the open, agricultural elements of the setting of the Monument still exists to the south, south east and north east, even if the details of that landscape have changed in the intervening centuries. The main changes to the setting have occurred to the south west with the development of Stratton Business Park and Stratton housing development to the north west. These changes certainly have an impact on the setting of the Scheduled Monument introducing suburban and industrial elements to it. However, in spite of the intrusions in to the setting it is still possible to appreciate and understand the context of the Scheduled Monument and its relationship to the landscape as well as its original historical context.

The proposed development will introduce a major new element to the setting of the Stratton Park moat designated heritage asset by extending Stratton Business park eastwards on to land immediately to the south of the Monument. The northern boundary of the proposed development site is immediately south of Dunton Lane which forms a common boundary with the Scheduled Monument which brings development substantially closer to it than it is at present; effectively only the width of Dunton Lane will lie between the development and the Scheduled Monument.

The *Heritage Statement* (6.2.1) describes the Scheduled Monument. It suggests that the earthworks to the east of the moat "...derive significance from their association with the moat." The National Heritage List for England description of the Monument does not make this distinction. While these earthworks are associated with the moated site they are designated in their own right as part of the overall complex of surviving medieval earthworks and are equal in significance to the moated site. The original setting of the Scheduled Monument is described (6.2) as being on the southern edge of the Stratton settlement with farmland beyond. It is noted that few features of the contemporary medieval landscape are now visible in the area, however, the Heritage Statement goes on to say "...the generally open appearance (of the landscape) is redolent of the farmed landscape around Stratton village as it might have appeared in the medieval period." This is, indeed, an accurate summary of the situation and indicates that the present setting of the Scheduled Monument, the open agricultural landscape, makes a substantial contribution to our understanding and appreciation of the Stratton Park Moat and associated earthworks and contributes to the significance of the monument; even if that setting has been substantially altered and is compromised to the west of the Monument. It is also suggested that topography is the most important element of the setting for our understanding of the form and function of the monument. I do not agree with this, the visibility of the monument is only part of the setting, it is the character and quality of the setting which allows us to understand the Monument and how it relates to the monument. If the setting of the Monument is altered from an open rural landscape which represents the original character of its environment to an urban or industrial, alien to its original function and context, no matter how visible the Monument remains from the wider landscape it is no longer possible to understand and appreciate the Monument's function and relation to its context with the result there is a substantial loss to the significance of the designated heritage asset.

The impact of the proposed development on the setting of the Scheduled Monument is discussed on the 8.1 of the Heritage Statement. It is noted that proposed development site includes few surviving visible remains of earlier landscape, largely field boundaries of post-medieval origin, none of which are contemporary with the designated heritage asset, and relatively few buried archaeological remains. Although the development will result in the loss of these features it is concluded that this will have a negligible impact on the setting of

the Scheduled Monument. These remains do not contribute very much to the significance of the setting of the Stratton Park Moat Scheduled Monument and their loss will not result in a major loss of significance to the designated heritage asset.

In 8.1.2 – 8.1.4 of the Heritage Statement various aspects of the landscape setting of the Scheduled Monument are discussed. It is concluded that the impact of the proposed development on the historic landscape context and topographical context of the designated heritage asset will be negligible to low. The impact on what is described as the aesthetic landscape context of the Scheduled Monument is assessed as being moderate on the grounds that it would increase and extend intrusive elements in the landscape in to the area immediately to the south of the Scheduled Monument; in particular the manorial earthworks which are more exposed than the moated site which is screened by vegetation. Sensitive landscaping and design of the development with careful placement and sympathetic design of large buildings are identified as having the potential to provide appropriate and adequate mitigation for the impact of the proposed development on the setting of the designated heritage asset.

There are a number of issues relating to the impact of the proposed development on the setting of the Stratton Park moated enclosure and associated manorial earthworks designated heritage asset. The application is for outline consent which mean that details of the development including the scale and layout of the build development and landscaping proposals are either lacking or presented in only indicative form. This makes it very difficult to assess the impact on the setting of the Scheduled Monument. I am concerned about the following:

The overall impact of the scale, massing and design of the proposed development - The Design and Access Statement says (2.4.1) that the building line could be set back from Dunton Lane to provide a landscaped street scene to acknowledge the Scheduled Monument. It goes on to state (2.4.2) that it is the intention to create landscaped street views along Dunton Lane, stepping back the building line to sensitively acknowledge the Scheduled Monument. The original site plan (17377-SK1010F) showed the built development extending very close to the north west corner of the site. Although the revised site layout plan (17377-SK1010K) shows the northern limit of the built development in the same position the layout of the development has been changed so that the northern part of the development is car parking with the first line of buildings to the south, moving them further away from the Schedule Monument. In Woods Hardwick's email of 30<sup>th</sup> November it is suggested that smaller scale buildings could be located at the northern end of the site which, in conjunction with the location of the car parking in this area would also help to reduce the impact of the development on the setting of the Monument. Setting back the main building line from the northern boundary of the site and placing car parking on the northern edge of the built development will serve to lessen the impact on the setting of the designated heritage asset. However, there is no information on the height and massing of the buildings, particularly those in the northern part of the site. There is also no suggestion that a design guide or approved set of parameters for the design of the development and landscaping will be required to control the designs of structures which will otherwise be left to the requirements of market conditions. Without adequate controls at the outline stage it will be impossible control the design of the development and ensure that its impact on the setting of the Scheduled Monument is minimised.

The location of an access point on the northern edge of the development off Dunton Lane – The original application included access to the site from Dunton Lane, although it was suggested that this would be a secondary access point with the main access being from the west through the existing Business Park via Pegasus Drive. No details of this access were provided within the application and once constructed it had the potential to attract additional

street lighting, signage and advertising. Overall an access off Dunton Lane would have had a major impact on the setting of the designated heritage asset. However, the revised site layout plan (17377-SK1010K) shows that the access off Dunton Lane has been deleted from the development proposal. This removes the impact that this part of the proposal on the setting of the designated heritage asset of Stratton Park Moat.

Landscaping along the northern edge of the site fronting on to Dunton Lane – This is the most sensitive part of the site in relation to the Scheduled Monument because it is very close to it. Screening along the Dunton Lane frontage is key to reducing the impact of the proposed development on the setting of the Scheduled Monument. On the information initially provided in the application it was suggested that the northern edge of the development will be designed to integrate the development into the local setting and help to meet the requirements of the objectives of the Biggleswade Green Wheel. In particular this included provision of a formal path or track along the northern edge of the proposed development site, immediately to the south of Dunton Lane. The landscaping associated with creation of the new public right of way appeared to be minimal and would not have provided appropriate screening between the development and the Stratton Park Moat Scheduled Monument. Creation of a public right of way along the northern edge of the development would have also brought a further element of suburbanisation to what is, at present, an open rural landscape and would have been contrary to the Basic Principles of the Green Wheel which says the route should “Cause no harm to archaeological sites and their settings.” It would have been likely to compromise the provision of adequate screening for the Scheduled Monument along the northern edge of the site. Revised plan B1400.401 (revised advanced planting) shows new landscaping proposals for the northern part of the site. This comprises a woodland hedge of up to 2.5m in height on the immediate Dunton Lane boundary with an area of lower woodland shrub planting studded with specimen trees to the south of the hedge. This is a more substantial planting proposal. While it might increase a sense of enclosure around the Monument whose setting has been shown to be an open agricultural landscape, the more substantial planting will certainly increase the screening of the development from the Monument and its immediate area. The revised site layout plan (17377-SK1010K) also shows the line of the Biggleswade Green Wheel Link has been moved south along the northern edge of the car parking. This is a more appropriate location for the path and will help to reduce its impact on the setting of the Scheduled Monument.

It is claimed in the *Planning Supporting Statement* (6.15) that objections to the allocation of this site for development were mainly technical rather than to the principle of the developing the site as an extension to Stratton Business Park. This is not the case, both English Heritage and the Archaeology Team objected to the principle of allocating this site on the grounds of its impact on the setting of the Stratton Park Moat Scheduled Monument. English Heritage’s objection was heard at the Enquiry in to the Site Allocations DPD (2011), though this objection was rejected by the Inspector and the site was allocated. However, Policy EA1 of the Site Allocations DPD requires that development of the site will be subject to “Appropriate mitigation against the impact on the Stratton Park Scheduled Ancient Monument”.

Paragraph 132 of the *NPPF* says that:

“Substantial harm to or loss of designated heritage assets of the highest significance, notably scheduled monuments, protected wreck sites, battlefields, grade I and II\* listed buildings, grade I and II\* registered parks and gardens, and World Heritage Sites, should be wholly exceptional”.

*And paragraph 133 goes on to say that:*

“Where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss...”

The application states (*Planning Supporting Statement* 6.39 ff) that the overall impact of the setting of the Scheduled Monument would be low and significance of the impact on the Scheduled Monument would be moderate. It also goes on to say (6.42) that the impact in the Monument needs to be balanced against the economic and social benefits the proposed development would bring.

I do not agree that the impact of the setting of the Stratton Park Moat Scheduled Monument and therefore on the significance of the designated heritage asset will be low and of only moderate significance. The open agricultural setting of the Monument is, as acknowledge in the *Heritage Statement* “...is redolent of the farmed landscape around Stratton village as it might have appeared in the medieval period...” even taking into account changes to the landscape that have occurred since the medieval period. Although the setting has been compromised by development on the west side of the Monument, including the existing Stratton Business Park to the south west, this does not justify extending the development eastwards into closer proximity to the Monument and seriously damaging its setting. Efforts have been made with the revisions to the application to mitigate the impact of the proposed development on the setting of the Stratton Park moat designated heritage asset by increasing the screening on the northern boundary of the site and moving the building line as far south as possible, placing a car park in front the first line of buildings and indicating that the height of those buildings will be restricted. These changes to the original application will reduce the impact of the proposal in the Scheduled Monument. However, the extent and scale of the development will result in a loss of a substantial part of the setting of the Stratton Park moat Scheduled Monument greatly reducing the open agricultural landscape setting of the Monument and making it difficult to appreciate and understand the Monument and its context. In my opinion, in spite of the best available mitigation proposals available in the context of the development proposal, this will result in substantial harm to the significance of the designated heritage asset. On that basis the test in paragraph 133 of the *NPPF* of whether the development provides a substantial public benefit which outweighs the harm to the significance of the designated heritage asset.

**If it is decided that the public benefit of the development outweighs the harm to the heritage asset and planning consent is granted it will be necessary to ensure that the revised advanced planting scheme identified in plan B15003.401 is secured. It should be included in a condition requiring approval of a landscaping plan before development commences. Control will also be required over development parameters including the northern limit of the building line, heights of the buildings and materials and finishes with the objective of keeping the northern extend of built development as far south as possible and ensuring that at least the first set of buildings are single storey. This could be secured by a condition requiring the approval of a development parameters plan before development commences.**

### ***Other Archaeological Remains***

Prior to the submission of the planning application and following discussions with the Archaeology Team an archaeological field evaluation comprising a geophysical survey and programme of trial trenching were undertaken. The results of the evaluation are described in the *Heritage Statement* (Albion Archaeology 2015). The evaluation confirmed the existence and defined the extent and character of archaeological sites and features known to exist

within the proposed development site (HERs 16157 and 161259); it also located a number of sites and features that had not previously been identified. Using the results of the evaluation the *Heritage Statement* identifies seven archaeological zones within the site:

Zone 1 – An area containing features on the periphery of the medieval settlement known to exist to the north of Dunton Lane and evidence of ,probably modern, horticultural activity.

Zone 2 – Remains of a Bronze Age ring ditch, a funerary monument.

Zone 3 – An early - middle Iron Age enclosed settlement with possible later Bronze Age origins.

Zone 4 – An early - middle Iron Age enclosed settlement.

Zone 5 – A late Iron Age – early Roman settlement.

Zone 6 – Peripheral activity associated with the settlements identified in Zones 3, 4 and 5 consisting of linear features probably representing field systems and agricultural features.

Zone 7 – Areas of the proposed development site outside the defined areas of Zones 1 – 6, where the evaluation did not identify extensive or substantial archaeological remains.

The *Heritage Statement* assesses the heritage assets with archaeological interest in Zones 1 and 3 – 5 as being of local to regional significance with the Bronze Age ring ditch in Zone 2 being of regional significance. The Zone 2 ring ditch is certainly of regional significance. The medieval remains in Zone 1 are likely to be associated with the Scheduled Monument to the north of Dunton Lane and could, therefore, be argued to be of equivalent significance, however, in isolation any medieval remains in this zone are probably better considered to be of regional significance as the importance understanding the origins, development and dynamics of medieval rural settlement has been identified in the published regional and local research frameworks. Horticultural activity, particularly in the Ivel Valley, has been recognised as having considerable importance in Bedfordshire (Oake et al 2007). I believe that the later prehistoric and Roman settlements in Zones 3, 4 and 5 are, individually, of regional significance as they have the potential to enhance our understanding of the origins and development of settlements in these periods as well as the internal organisation and function of settlements in these periods and the transition between Iron Age and Roman periods. Their value is enhanced by their close proximity which will allow us to understand the relationship between sites over time and the dynamics of the developing settlement pattern and landscape through time. They also form part of an extensive contemporary landscape that is known to exist in the surrounding area. On this basis I think that Zones 3 – 5 are of regional significance. The features in Zone 6 form part of the landscape contemporary with the settlements in Zones 3 – 5. As such they too are of regional rather than local significance as their value is enhanced by association with the settlements they served, allowing us to understand the interrelationships between settlements and the landscapes that supported them. The identified archaeological remains in Zone 7 are limited in extent, though it likely that there are some features within this zone which relate to the sites identified in the other zones.

It is suggested in the *Heritage Statement* that there will be an adverse impact on buried archaeological remains from the groundworks required in the construction of the proposed development. The magnitude of this impact is assessed as ranging from low to moderate

and low to high, with the overall assessment being of a moderate impact of slight to moderate significance. This is on the basis that the archaeological remains are generally robust and while there will be locally high impact the remains will largely remain intact and the coherence of the remains will be largely retained. At one level it is difficult to predict the archaeological impact of a development proposal that is only in outline. However, the indicative site layout reflects a density and extent of build development similar to that for the existing Stratton Business Park immediately to the west. It must be assumed that the indicative layout is an accurate reflection of the final development. On that basis there is very little of the proposed development that will not be occupied by buildings or structures in the form of industrial/commercial buildings, car parks or elements infrastructure. Construction of all these elements of proposed development will require groundworks which will impact on buried archaeological remains resulting in their destruction and a total loss of significance to the heritage assets with archaeological interest. Even if small pockets of archaeological deposits were not directly affected by groundworks their relationship with remains would be lost and the integrity and coherence of the archaeological remains would also be lost, destroying their significance. Given the extent and density of the proposed development suggested by the indicative site plan, I do not agree that the magnitude and significance of the impact on buried archaeological remains can be classed as no greater than moderate. It is unlikely that there will be any substantial or coherent survival of archaeological remains once the development is completed. Thus, in my opinion the both the magnitude and significance of the impact on buried archaeological remains and on the significance of the heritage assets with archaeological interest that they represent should be considered to be high throughout the proposed development site.

Mitigation of the direct impact of the proposal on archaeological remains is also discussed in the *Heritage Statement*. It is suggested that a programme of archaeological investigation in advance of development or preservation *in situ* of archaeological remains through the design of the development would provide appropriate strategies for mitigating the impact of development on buried archaeological remains. On the basis of the information contained in the outline application the proposed development is likely to result in the total loss of significance of the heritage assets with archaeological interest that lie within the proposed development site. The archaeological remains within the site are of regional significance which is enhanced by the relationship between the sites and features which illustrate the origins, development and organisation of the contemporary landscape and settlement pattern. However, their significance is such that they do not merit refusing planning permission or amending the planning application in order to protect the archaeological remains provided that appropriate strategies are put in place to mitigate the impact of the proposal on the significance of the development on the heritage assets with archaeological interest. Any strategy would have to include either the investigation, recording, analysis and publication of all archaeological remains directly affected by the proposed development or the preservation *in situ* of archaeological remains within the development in such a way that any preserved remains are a coherent whole which maintain the significance of the remains; the partial preservation *in situ* of parts or fragments of larger sites will not be acceptable. It should also include a programme of public outreach and engagement including amongst other activities public open days during excavations, lectures explaining the results and significance of the results of the excavations and interpretative material incorporated within the development. This can be secured by attaching the following condition to any planning permission granted in respect of this application:

***"No development shall take place within each phase of the development until a written scheme of archaeological resource management has been submitted to and approved in writing by the Local Planning Authority. The said development shall only be implemented in full accordance with the approved scheme of archaeological resource management."***

***This written scheme will include the following components, completion of each of which will trigger the phased discharging of the condition:***

***(i) A method statement for the investigation and recording of any archaeological remains present;***

***(ii) A method statement for the preservation in situ and management of archaeological sites and features that have been identified for protection;***

***(iii) A post-excavation assessment and updated project design (to be submitted within six months of the completion of fieldwork at (i), unless otherwise agreed in advance in writing by the Local Planning Authority);***

***(iv) Completion of post-excavation analysis, preparation of site archive ready for deposition at a store approved by the Local Planning Authority, completion of an archive report, and submission of a publication report (to be completed within two years of the completion of fieldwork at (i), unless otherwise agreed in advance in writing by the Planning Authority);***

***(v) A Programme of interpretation, public outreach and community engagement.***

**Reason: (1) To record and advance understanding of the archaeological resource which will be unavoidably destroyed as a consequence of the development in accordance with Chapter 12 of the *National Planning Policy Framework*.**

**(2) : This condition is pre-commencement as a failure to secure appropriate archaeological investigation in advance of development would be contrary to paragraph 141 of the *National Planning Policy Framework (NPPF)* that requires the recording and advancement of understanding of the significance of any heritage assets to be lost (wholly or in part).**