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Bedford Borough Council

By Email  
PL00636502

[REDACTED]

Our ref:

2021

28 January

Dear Ms Wilson

**Ref: Turvey - Land of Carlton Road HIA Report**

Thank you for your email requesting a comments on this heritage impact assessment.

The HIA has been prepared on behalf of the Turvey Estate Trustees, and examines the potential impact of developing the site known as 'Land off Carlton Road', which is proposed for allocation as part of the Turvey Neighbourhood Plan. The HIA was prepared in 2017, and therefore makes reference to a number of now superseded versions of either policy or advice.

In general, where site allocations are proposed as part of the plan-making process, we refer plan-makers and other stakeholders to Historic England Advice Note 3: Site Allocations and Local Plans. This advice note sets out what we consider to be a robust process for assessing the potential impact of site allocations on any relevant heritage assets. In particular we would highlight the Site Selection Methodology set out on Page 5.

We would expect a proportionate assessment based on this methodology to be undertaken for any site allocation where there was a potential impact, either positive or negative, on a heritage asset, and consequently to advise on how any harm should be minimised or mitigated. Advice Note 3 can be found here:  
<https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>

We agree with the broad high level conclusion of the HIA that there could be a potential for some harm caused by the development of this site. We do not object in principle, however, but would expect the development to avoid or minimise harm



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through design - particularly the detail of the junction, which should avoid over-engineered highways infrastructure.

We consider that the HIA provides follows the methodology set out in the Good Practice Advice 3: Setting of Heritage Assets (distinct from the advice note referenced above, but not inappropriate in the context of the report). However, the precise extent of the potential harm is difficult to conclude more precisely from the information provided, owing to spatial and analytical limitations with the assessment.

For example, although it covers all the relevant heritage assets, it is a relatively brief assessment that is principally descriptive and could perhaps provide a more proportionate and more deeply analytical assessment in line with the significance of the heritage assets potentially affected. For example, whilst it highlights the location and extent of the registered park and garden and house within it, it could also include analysis of the design of the landscape and the parkland features as a hierarchical ensemble, in order to more precisely define the contribution of the site to its significance - particularly in terms of the orientation and layout of the principal house in relation to that landscape and also the proposed allocation.

We note that the report assesses the proposed within a red line that is not in alignment with the extent of site allocation proposed in the Regulation 16 neighbourhood plan. The supporting policy and mapping for the allocation also includes elements of landscape mitigation which are not discussed in the HIA. We would recommend that the HIA be updated to reflect this. At the moment its conclusions do not reflect what is proposed and are therefore challengeable.

Historic England strongly advises that the conservation and archaeological staff of the relevant local planning authorities are closely involved throughout the preparation of the plan and its assessment. They are best placed to advise on; local historic environment issues and priorities, including access to data held in the Historic Environment Record (HER), which should be consulted as part of the HIA process. In addition, they will be able to advise how any site allocation, policy or proposal can be tailored to minimise potential adverse impacts on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets.

To avoid any doubt, this does not reflect our obligation to provide further advice on later stages of Site process and, potentially, object to specific proposals or details thereof which may subsequently arise (either as a result of this consultation or in later versions of the plan/guidance) where we consider that these would have an adverse effect upon the environment.

Yours sincerely,



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