

MORRISONS, LETCHWORTH
HERITAGE STATEMENT

29075

JULY 2026



On Behalf of: *MBH Design Studio*
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Glossary and Abbreviations

Glossary

Term	Definition
Aesthetic Value	Value deriving from the ways in which people draw sensory and intellectual stimulation from a place.
Archaeological Site	A place or group of physical sites in which evidence of past human activity is preserved; the place where a historic asset is located.
Architectural Interest	The architectural interest of a building may include its design, designer, materials, setting and the extent to which these characteristics survive. These factors are grouped under two headings: Design and Setting.
Communal Value	Value deriving from the meaning of a place for the people who relate to it, or for whom it figures in their collective experience or memory.
Conservation Area	An area of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance, designated under the Planning (Listed Buildings and Conservation Areas) Act 1990.
Cultural Significance/Cultural Heritage Value	The aesthetic, historic, scientific, social, or spiritual value of a heritage asset for past, present or future generations.
Designated Historic/Heritage Asset	A World Heritage Site, Scheduled Monument, Registered Battlefield, Registered Park and Garden, Listed Building, Protected Wreck Site or Conservation Area designated as such under the relevant legislation.
Physical Impacts	Potential physical impacts on heritage assets or buried archaeological remains which may survive relate to the possibility of disturbing, removing, or destroying in situ remains and artefacts during development works (including excavation, construction, and other works associated with the Proposed Development). Physical impacts have the capacity to result in impacts of high magnitude as they could potentially result in the destruction or removal of a heritage asset.
Evidential Value	Value deriving from the potential of a place to yield evidence about past human activity.
Harm	A change for the worse, here primarily referring to the effect of inappropriate interventions on the heritage values of a historic asset.
Historic/Heritage Asset	An identifiable component of the historic environment. It may consist or be a combination of an archaeological site, a historic building or area, historic park and garden or a parcel of historic landscape. Nationally important historic assets will normally be designated.
Historic Environment	All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and deliberately planted or managed.
Historic Interest	Historic interest is in such things as a building's age, rarity, social historical interest and associations with people or events that have had a significant impact on Scotland's cultural heritage. Historic interest is assessed under three headings; Age and rarity: Social historical interest: and Association with people or events of national importance.

Term	Definition
Historic Value	Value deriving from the ways in which past people, events and aspects of life can be connected through a place to the present.
Listed Building	A building of special architectural or historic interest which is included in a list compiled or approved by the UK Government.
Locally Listed Building	A building, structure, or feature which has been designated an important part of Birmingham's heritage due to its architectural, historic or archaeological significance, but is not considered to meet the criteria for national designation.
Non-Designated Heritage Asset	A heritage asset which is not designated, usually identified by local historic environment records and protected by NPPF and local planning policy.
Registered Battlefield	A list of nationally important battlefields recorded on the Register of Historic Battlefields administered by Historic England.
Registered Park and Garden	An area of specifically designed landscape recorded on the Register of Parks and Gardens of Special Historic Interest in England under the National Heritage Act 1983 and administered by Historic England.
Scheduled Monument	A monument which is included in the Schedule of Monuments compiled and maintained by the UK Government under the Ancient Monuments and Archaeological Areas Act 1979.
Setting	The surroundings in which a historic asset is understood, experienced and appreciated, embracing present and past relationships to the surrounding landscape. Its extent is not fixed and may change as the asset and its surroundings evolve. Setting is not itself a heritage asset, though land within a setting may contain other heritage assets. Elements of a setting may make an adverse (diminishment) or positive (beneficial) contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.
Setting Impacts	Potential impacts which include consideration of whether any change as a result of a proposed development would constitute an adverse impact (diminishment) to those attributes of the setting of the assets which directly contribute to their significance rather than simply being an alteration to, or addition of a new element to the existing settings of these assets. Where a new development may be located within the setting of an asset but does not diminish the significance of the asset or the ability to appreciate that significance, it may have a neutral impact.
Significance	The sum of the cultural heritage values of a place, often set out in a statement of significance.
World Heritage Site	A natural or cultural site, area or structure recognised as being of Outstanding Universal Value and inscribed under the UNESCO Convention Concerning the Protection of the World Cultural and Natural Heritage 1972.
Written Scheme of Investigation	A written statement on the objectives of a project, including methods, timetable and resources. These form the framework for the execution of the project through to completion, set out in sufficient detail to be quantifiable, implemented and monitored. The project design may be updated following post-excavation assessment.

Abbreviations

Abbreviation	Term
AD / CE	<i>Anno Domini</i> / Common Era
ADS	Archaeological Data Service
ALGAO	Association of Local Government Archaeological Officers
AOD	Above Ordnance Datum
BC / BCE	Before Christ / Before Common Era
BGS	British Geological Survey
CifA	Chartered Institute for Archaeologists
CUCAP	Cambridge University Collection of Aerial Photography
DLUHC	Department of Levelling-Up, Housing and Communities
HIA	Heritage Impact Assessment
HER	Historic Environment Record
ISO	International Organization for Standardization
LLB	Locally Listed Building
MHCLG	Ministry of Housing, Communities and Local Government
NGR	National Grid Reference
NHLE	National Heritage List for England
NLS	National Library of Scotland
NPPF	National Planning Policy Framework
NTS	Non-Technical Summary
OS	Ordnance Survey
PAS	Portable Antiquities Scheme
PPG	Planning Practice Guidance
RO	Registered Organisation
UNESCO	United Nations Educational, Scientific and Cultural Organization
WHS	World Heritage Site
WSI	Written Scheme of Investigation

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Non-Technical Summary

AOC Archaeology Group was commissioned by MBH Design Studio Ltd to undertake a Heritage Statement (HS) for the proposed car park infrastructure project at Morrisons, Letchworth (hereafter – the ‘Site’, Figure 1). The Site lies within the local authority administrative area of North Herts Council.

This assessment has found there is a Low potential for previously unidentified archaeological remains to be found within the Site. There is considered to be a Low potential for finds or features from the prehistoric, Roman, medieval and Post-medieval periods to be present within the Site. The Site was likely undeveloped agricultural land prior to the construction of Letchworth Garden City in the 20th century. However, it should be noted that there have been no archaeological investigations carried out within the Site and limited archaeological investigations carried out in the 500m Study Area. Therefore, the absence of evidence could reflect a genuine absence of activity or could be as a result of a lack of archaeological research in the area. Any archaeological remains that were to be found could be of Negligible to High importance, dependant on the nature, form and extent of their survival.

Any direct physical impacts within the Site would be limited to the addition of one single head floodlight, an Airserv Air Unit, an Airserv Vacuum Unit and the addition of two new valeting bays which would also be installed. These would result in an extremely limited to negligible impact upon any buried archaeology within the Site. In accordance with national and local planning policies on heritage, it is advised that North Herts Council may require an archaeological investigation by non-intrusive and/or intrusive methods to further investigate the potential for archaeological finds or features to remain on the Site. Any such requirement would be determined in consultation with North Herts Council.

This assessment considers the potential for the Proposed Development to result in impacts upon the character and settings of designated and locally listed heritage assets within 500m of the Site. This includes consideration of whether any such change would constitute an adverse impact (diminishment) to those attributes of the designated assets which directly contribute to their significance rather than simply being an alteration to, or addition of a new element to the existing character or settings of these assets.

With the exception of the Grade II* Listed Spirella Building and Letchworth Conservation Area the Proposed Development has been assessed as having no impacts upon their settings or character and therefore there is no mitigation required.

A Neutral level of impact has been predicted upon the setting of the Grade II* Listed Spirella Building (Asset 2, Listed Entry No. 1347670). Therefore no harm to the Spirella Building is predicted, as the Proposed Development would neither diminish nor enhance the ability to appreciate its significance. Thus the policy tests as set out in NPPF are not invoked and no mitigation is proposed beyond that inherent to the design (i.e. proposed screening etc.)

A Neutral level of impact has been predicted upon the setting of Letchworth Conservation Area (Asset 1). Therefore no harm to Letchworth Conservation Area (Asset 1) is predicted.

Thus the policy tests as set out in NPPF are not invoked and no mitigation is proposed beyond that inherent to the design (i.e. proposed screening etc.) It is considered that the character and appearance of Letchworth Conservation Area would be preserved, and that the Proposed Development would not conflict with Local Plan Policies SP13 and HE1.

1 Introduction

1.1 Development Site

- 1.1.1 AOC Archaeology Group was commissioned by MBH Design Studio Ltd to undertake a Heritage Statement (HS) for the proposed car park infrastructure project at Morrisons, Letchworth (hereafter – the ‘Site’, Figure 1). The Site lies within the local authority administrative area of North Herts Council.

1.2 Development Proposal

- 1.2.1 MBH Design Studio commission AOC Archaeology Group to undertake a HS. Electrical Vehicle (EV) Parking with infrastructure has been approved and constructed within the car park at Morrisons as per Planning Application 25/00466/FP. Seven parking bays have also been removed.
- 1.2.2 It is proposed that the existing development would be completed with the addition of two new Closed Circuit Television (CCTV) cameras installed at a height of 2.7m on poles measuring 3m in height. An Airserv Air Unit and an Airserv Vacuum Unit two and new valeting bays would also be installed. Four single head floodlights would be installed to a height of 4m, attached to the back plate of the EV charging stations (Planning Application 26/00853/FP). At the time of AOC’s site visit on the 27th of July three of the charging stations had the poles installed although no floodlights had been fitted.
- 1.2.3 The Site covers an irregularly shaped area of tarmac and existing carpark measuring 1.05 ha centred at National Grid Reference (NGR) TL 21553 32653 and located in the northwest of the Morrisons Car Park. The Site is bound to the northwest by a road, Station Way, and on all other sides by the existing car park. The Site is located 87m Above Ordnance Datum (AOD).

1.3 Topographical and Geological Conditions

- 1.3.1 The bedrock geology is recorded as being Holywell Nodular Chalk Formation and New Pit Chalk Formation (undifferentiated)-Chalk, a sedimentary bedrock formed between 100.5 million years ago and 89 million years ago during the Cretaceous period and the superficial deposit is recorded being Lowestoft Formation-Diamicton, a sedimentary deposit formed between 480 thousand years ago and 423 thousand years ago during the Quaternary period (BGS 2026). There are no boreholes recorded within Site and the few that are closest, potentially part of the Morrisons development, are listed as confidential (BGS 2026).

1.4 Government and Local Planning Policies

Legislative Framework

- 1.4.1 Parliamentary legislation for Listed Buildings and Conservation Areas is provided by the Planning (Listed Building and Conservation Areas) Act 1990, whilst specific legislation for Scheduled Monuments is provided by the Ancient Monuments and Archaeological Areas Act

1979. The most recent legislation, the Levelling Up and Regeneration Act 2023, includes provision for designated heritage assets including Scheduled Monuments, Listed Buildings and Registered Parks and Gardens, as well as placing a statutory duty on Local Planning Authorities to maintain Historic Environment Records (HERs). With regard to World Heritage Sites, Scheduled Monuments, Registered Parks and Gardens, Protected Wrecks and ‘*other area[s] of land included in a register maintained by the Historic Buildings and Monuments Commission for England [Historic England]*’, Section 102 of the 2023 Act amends Section 58 of the Town and Country Planning Act 1990 to include a new section, Section 58B, which states that:

In considering whether to grant planning permission or permission in principle for the development of land in England which affects a relevant asset or its setting, the local planning authority or (as the case may be) the Secretary of State must have special regard to the desirability of preserving or enhancing the asset or its setting (TCPA 1990, Section 58 as amended by LURA 2023, Section 102).

- 1.4.2 However, it should be noted that for the recent Hamilton Hill Solar Farm appeal decision the Inspector commented that this amendment “*is not in force by Royal Assent and secondary legislation is required for it to come into force*” (Thompson 2024, 2). Therefore, whilst weight should be attached to Section 102 of LURA, until the 1990 Town and Country Planning Act is amended the legislative framework remains as set out in Sections 66(1) and 72(1) of the 1990 Planning (Listed Building and Conservation Areas) Act which cover Listed Buildings and Conservation Areas respectively.

National Planning Policy

- 1.4.3 The National Planning Policy Framework (NPPF) was published by the Ministry of Housing, Communities and Local Government (MHCLG) and was last updated in February 2025. The NPPF sets out the Government’s planning policies for England and how these should be applied. It provides a framework within which locally prepared plans for development can be produced and assessed. Chapter 16 of the document is concerned with ‘Conserving and enhancing the historic environment’. It identifies heritage assets as ‘*an irreplaceable resource*’ and notes that they “*should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations*” (MHCLG 2025, para 202).
- 1.4.4 Where designated assets are concerned great weight should be given to the asset’s conservation. The more important the asset the greater the weight should be. Any harm to or loss of significance should require:

Clear and convincing justification. Substantial harm to or loss of:

- *Grade II listed building or grade II registered parks or gardens should be exceptional;*

- *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 (ibid., para 213).*

- 1.4.5 Regarding proposals that are predicted to lead to substantial harm or the total loss of significance to a designated asset, Paragraph 214 states that *“local planning authorities should refuse consent, 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” (ibid., para 214).* Where *“a development proposal will lead to less than substantial harm to the significance of a designated asset”*, Paragraph 215 states that *“this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use” (ibid., para 215).*
- 1.4.6 Impacts upon non-designated heritage assets are also a pertinent planning consideration: Paragraph 216 states that *“In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset” (ibid., para 216).*
- 1.4.7 Where a heritage asset is to be lost, either in part or in whole, as a result of the development, the local planning authority should require developers to *“record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible” (ibid., para 218).*
- 1.4.8 Historic England define harm in their Conservation Principles (2008) as a *“change for the worse, here primarily referring to the effect of inappropriate interventions on the heritage values of a place” (Historic England 2008, 71).*

Local Planning Policies

- 1.4.9 Local Plans contain the Local Authority policies for land-use and development control across a district. The North Hertfordshire Local Plan 2011 – 2031 was adopted in November 2022 and includes the following policies relevant to this assessment:

Policy SP13: Historic environment

The Council will balance the need for growth with the proper protection and enhancement of the historic environment. When considering the impact of a proposed development on the significance of a designated heritage asset, great weight will be given to the asset’s conservation and the management of its setting. We will pursue a positive strategy for the conservation and enjoyment of the historic environment through:

- a) Maintaining a strong presumption in favour of the retention, preservation and enhancement of heritage assets and their setting according to their significance;*

- b) Identifying sites on the national register of Heritage at Risk or on the Council's 'At Risk' register;*
- c) Periodic reviews of Conservation Areas and other locally designated assets; and*
- d) Publication of detailed guidance (North Hertfordshire Local Plan 2011 – 2031, 2022, 76)*

Policy HE1: Designated Heritage Assets

Planning applications relating to Designated Heritage Assets or their setting shall be accompanied by a Heritage Assessment/Justification Statement that:

- i. Assesses the significance of heritage assets, including their setting;*
- ii. Justifies and details the impacts of any proposal upon the significance of the designated heritage asset(s); and*
- iii. Informs any necessary measures to minimise or mitigate against any identified harms.*

Planning permission for development proposals affecting Designated Heritage Assets or their setting will be granted where they (as applicable):

- a) Enable the heritage asset to be used in a manner that secures its conservation and preserves its significance;*
- b) Incorporate a palette of materials that make a positive contribution to local character or distinctiveness, where it is appropriate and justified; and*
- c) Will lead to less than substantial harm to the significance of the designated heritage asset, and this harm is outweighed by the public benefits of the development, including securing the asset's optimum viable use.*

Where substantial harm to, or loss of significance, of a designated heritage asset is proposed the Council shall refuse consent unless it can be demonstrated that the scheme is necessary to deliver considerable public benefits that outweigh the harm or loss.

12.1 Designated heritage assets include Scheduled Monuments, Listed Buildings, Conservation Areas and Registered Parks and Gardens. National guidance states that great weight should be given to the conservation of those asset, including (where appropriate) securing an asset's optimum viable use. (ibid., p168)

Policy HE3: Non-Designated Heritage Assets

Permission for a proposal that would result in harm to, or the loss of, a non-designated heritage asset will only be granted provided that a balanced judgement has been made that assesses the scale of harm to, or loss of significance of the non-designated asset and, where the proposal results in the loss of a non-designated heritage asset:

- a) The replacement building contributes to preserving the local character and distinctiveness of the area; and*

- b) *Where the asset is located in a conservation area a continuous contract for the demolition and redevelopment of the site has been secured, unless there are justifiable grounds for not developing the site. (North Hertfordshire District Council, North Hertfordshire Local Plan 2011 – 2031, 2022, 170)*

Policy HE4: Archaeology

Permission for development proposals affecting heritage assets with archaeological interest will be granted provided that:

- a) *Developers submit an appropriate desk-based assessment and, where justified, an archaeological field evaluation.*
- b) *It is demonstrated how archaeological remains will be preserved and incorporated into the layout of that development, if in situ preservation of important archaeological remains is considered preferable; and*
- c) *Where the loss of the whole or a material part of important archaeological remains is justified, appropriate conditions are applied to ensure that the archaeological recording, reporting, publication and archiving of the results of such archaeological work is undertaken before it is damaged or lost.*

Where archaeological sites have been assessed to meet the criteria for inclusion on adopted registers or maps of locally important heritage assets these shall be treated in the same way as archaeology areas and areas of archaeological significance.

Areas of as yet, unknown archaeology may be identified during research, or through the planning or plan making process. These sites or areas should be treated in the same way as archaeology areas and areas of archaeological significance. (ibid., 171)

Planning Practice Guidance (PPG)

- 1.4.10 The DLUHC and MHCLG published Planning Practice Guidance in April 2014 to expand upon the NPPF; it is a Live Document and the section on the historic environment was last updated in July 2019. Section 18a of the guidance is concerned with ‘Conserving and Enhancing the Historic Environment’. The Guidance notes that “*conservation is an active process of maintenance and managing change. It requires a flexible and thoughtful approach to get the best out of assets as diverse as listed buildings in everyday use and as yet undiscovered, undesignated buried remains of archaeological interest*” (DLUHC & MHCLG Live Document).
- 1.4.11 PPG requires assessments to consider the potential for harm of a Proposed Development on heritage assets in order to understand the impact on the significance of the heritage asset (*ibid.*, para 18). Where designated heritage assets will be impacted upon, the PPG requires the assessment to clearly state whether that harm will be substantial or less than substantial.
- 1.4.12 When considering whether a proposal would cause substantial harm to a designated asset, PPG observes that:

Substantial harm is a high test, so it may not arise in many cases. For example, in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset's significance rather than the scale of the development that is to be assessed. The harm may arise from works to the asset or from development within its setting.

While the impact of total destruction is obvious, partial destruction is likely to have a considerable impact but, depending on the circumstances, it may still be less than substantial harm or conceivably not harmful at all, for example, when removing later additions to historic buildings where those additions are inappropriate and harm the buildings' significance. Similarly, works that are moderate or minor in scale are likely to cause less than substantial harm or no harm at all. However, even minor works have the potential to cause substantial harm, depending on the nature of their impact on the asset and its setting (ibid.).

Setting Guidance

- 1.4.13 The NPPF defines the setting of a heritage asset as 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” (MHCLG 2025, Glossary).

- 1.4.14 Historic England also provide guidance on setting:

The ‘setting of a heritage asset’ is defined in the Glossary of the National Planning Policy Framework. A thorough assessment of the impact on setting needs to take into account, and be proportionate to, the significance of the heritage asset under consideration and the degree to which proposed changes enhance or detract from that significance and the ability to appreciate it.

Setting is the surroundings in which an asset is experienced, and may therefore be more extensive than its curtilage. All heritage assets have a setting, irrespective of the form in which they survive and whether they are designated or not.

The extent and importance of setting is often expressed by reference to visual considerations. Although views of or from an asset will play an important part, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. For example, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each.

The contribution that setting makes to the significance of the heritage asset does not depend on there being public rights or an ability to access or experience that setting. This will vary over time and according to circumstance.

When assessing any application for development which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change. They may also need to consider the fact that developments which materially detract from the asset's significance may also damage its economic viability now, or in the future, thereby threatening its on-going conservation (Historic England 2017, 4).

Public Benefit

1.4.15 NPPF sets out three objectives to achieving sustainable development: economic; social; and environmental (MHCLG 2025, para 8). Proposals for social value/public benefit can contribute to developments achieving these objectives. In terms of heritage and archaeology, “Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats” (*ibid.*, para 203). Any proposal for a social value/public benefit strategy should take into account:

- a) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;*
- b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;*
- c) the desirability of new development making a positive contribution to local character and distinctiveness; and*
- d) opportunities to draw on the contribution made by the historic environment to the character of a place (ibid.).*

1.4.16 PPG provides a definition and guidance for public benefit where a development can achieve sustainable objectives (DLUHC & MHCLG Live Document, para 20) and where there is the potential for harm to heritage assets. PPG states that that “Public benefits should flow from the proposed development” and that benefits “should be of a nature or scale to be of benefit to the public at large and not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits” (*ibid.*).

1.4.17 The Chartered Institute for Archaeologists (CIfA) (2021) and The Association of Local Government Archaeological Officers (ALGAO) (Mann 2023) have also recently noted the need for public benefit in archaeology.

1.5 Planning Considerations Pertaining to the Site

1.5.1 The Local Planning Authority is advised on all archaeological matters by Hertfordshire Historic Environment Advisory Service.

- 1.5.2 There are no heritage assets within the Site.
- 1.5.3 The Site is located within Letchworth Conservation Area (Asset 1).
- 1.5.4 Within the 500m Study Area there is one Grade II* Listed Building (Asset 2) and 14 Grade II Listed Buildings (Assets 3-14 & 42-43),
- 1.5.5 Within the 500m Study Area there is one Grade II Register Park and Garden; Broadway, Letchworth (Asset 17). The Broadway is given a wider area within the Hertfordshire County Council HER which includes the enclosing Broadway Road.
- 1.5.6 There are no Scheduled Monuments, Registered Parks and Gardens, Registered Battlefields or World Heritage Sites within the Site of the 500m Study Area.
- 1.5.7 This HS has been produced to support two planning applications at Morrisons Letchworth; one for floodlights and one for Air/Vac units.
- 1.5.8 A previous planning applications; Planning Application 25/00466/FP noted the location of the Site within the Letchworth Conservation Area (Asset 1). This was not refused on heritage grounds but the potential impact on the appearance of Letchworth Conservation Area was noted. The Decision notice stated that:

'4.2.20 The proposed development would be within a supermarket car park. The supermarket building is well-designed and whilst the supermarket and associated car park does not significantly detract from the heritage significance of the conservation area, it does not make a material positive contribution, nor would the proposed development. As indicated earlier in this report the proposed development would not appear incongruous within its context, and as such it is considered that the character and appearance of the conservation area would be unharmed by the proposal.'

4.2.21 Therefore, it is considered that the character and appearance of the conservation area would be preserved, and that the proposal would not conflict with Local Plan Policies SP13 and HE1'

- 1.5.9 The North Hertfordshire Local Plan 2011 – 2031 states that:

Particular care will be required when considering the scale, layout, design and materials of development proposals within or adjacent to conservation areas. They must be designed to harmonise with their surroundings and in conservation areas preserve or enhance the character or appearance of the heritage asset. (ibid., p169)

1.6 Limitations of Scope

- 1.6.1 This assessment is based upon data obtained from publicly accessible archives as described in the Data Sources in Section 3.2 and a site visit. Heritage assets within 500m of the Site were identified. An extract from the Hertfordshire County Council Historic Environment Record (HER) was received by AOC on the 3rd of July 2026 and the National Heritage List for England

(NHLE) was accessed in July 2026. The information presented in the gazetteer regarding known heritage assets is current to these dates.

- 1.6.2 It should be noted that the report has been prepared under express instructions and solely for the use of MBH Design Studio Ltd and their partners. All the work carried out in this report is based upon AOC Archaeology Group's professional knowledge and understanding of current (July 2026) and relevant United Kingdom standards and codes, technology, and legislation.
- 1.6.3 Changes in these areas may occur in the future and cause changes to the conclusions, advice and/or recommendations given. AOC Archaeology Group does not accept responsibility for advising MBH Design Studio Ltd or associated parties of the facts or implications of any such changes in the future.

2 Aims and Objectives

- 2.1.1 The aim of this assessment is to identify the cultural heritage value of the Site proposed for development. The evidence presented and the conclusions offered will provide a comprehensive basis for further discussion and decisions regarding heritage constraints on the future development of this Site and for the formulation of a further mitigation strategy, should this be required.
- 2.1.2 The objectives to be undertaken in pursuing this study will be focused on assessing the heritage significance of the Site by examining a variety of evidence for upstanding and buried remains of heritage interest including World Heritage Sites, Scheduled Monuments, Listed Buildings, Conservation Areas, Registered Parks and Gardens and Registered Battlefields, non-designated heritage assets, and Locally Listed Buildings within 500m of the Site. The assessment is based upon data obtained from publicly accessible archives as described in Data Sources (Section 3.2).

3 Methodology

3.1 Standards

- 3.1.1 The scope of this assessment meets the requirements of current planning regulations set out in Planning Practice Guidance (DLUHC & MHCLG Live Document); National Planning Policy Framework (MHCLG 2025); Ancient Monuments and Archaeological Areas Act 1979; Planning (Listed Buildings and Conservation Areas) Act 1990; and Town and Country Planning Act, 1990 as amended by the Levelling-up and Regeneration Act, 2023; and local planning policies.
- 3.1.2 AOC Archaeology Group conforms to the standards of professional conduct outlined in the Chartered Institute for Archaeologists (CIfA) Code of Conduct (CIfA 2025a), the CIfA Standard and Guidance for Commissioning Work or Providing Consultancy Advice on Archaeology and the Historic Environment (CIfA 2020a), the CIfA Standards and Guidance for Historic Environment Desk-Based Assessments (CIfA 2020b), the CIfA Regulations for Professional Conduct (CIfA 2025b), and other relevant guidance.
- 3.1.3 AOC Archaeology Group is a Registered Organisation (RO) of CIfA. This status ensures that there is regular monitoring and approval by external peers of our internal systems, standards and skills development.
- 3.1.4 AOC is ISO 9001:2015 accredited, in recognition of the Company's Quality Management System.

3.2 Data Sources

- 3.2.1 The following data sources were consulted during preparation of this assessment:
- National Heritage List for England (NHLE) for designated heritage asset data;
 - The Hertfordshire County Council HER for records of designated and non-designated assets and previous archaeological interventions;
 - North Hert Council for information on Letchworth Conservation Area and Letchworth Conservation Area Appraisal;
 - Historic Maps held by the British Library and the National Library of Scotland;
 - Archaeological Data Service (ADS) for heritage data including grey literature reports, archaeological journals, and the Excavation Index for England;
 - Aerial photography images from Historic England's online Aerial Photo Explorer, the Britain from Above website, the National Collection of Aerial Photography (NCAP) website and the Cambridge Collection of Aerial Photography (CUCAP) website;
 - The Environment Agency for any available LiDAR imagery of the Site;
 - Google Earth Pro™ for current and historical satellite imagery of the Site;
 - The Genealogist website for relevant parish Tithe maps and apportionment details;

- British Geological Survey (BGS) data for information about the geological character of the Site;
- The East of England Regional Research Framework for archaeology and heritage; and
- Other online resources.

3.3 Report Structure

- 3.3.1 Each heritage asset and previous archaeological investigation (event) referred to in the text is listed in the Gazetteer in Appendix 1. Each has been assigned an 'Asset/Event No.' unique to this assessment, and the Gazetteer includes information regarding the type, period, grid reference, NHLE/HER reference number, statutory protective designation, and other descriptive information, as derived from the consulted sources.
- 3.3.2 Each heritage asset/event referred to in the text is plotted on the location map (Figure 2) at the end of the report, using the assigned Asset/Event Nos. The Site is shown outlined in red.
- 3.3.3 All features of potential heritage significance located within 500m of the Site have been included in the assessment. The aim of this is to identify known heritage assets which may be subject to physical impacts and to help predict whether any similar hitherto unknown archaeological remains survive within the Site and thus may be impacted.
- 3.3.4 All sources consulted during the assessment, including publications, archived records, photographic and cartographic evidence, are listed amongst the References in Section 7.

3.4 Assessment Criteria

- 3.4.1 The assessment aims to identify the known and likely archaeological potential of the Site and the relative value or importance of such a resource / asset. The criteria for assessing these factors are laid out in detail in Appendix 2.
- 3.4.2 The criteria for assessing archaeological potential are expressed in this report as ranging between the scales of High, Medium, Low and Uncertain, criteria for which are also noted in Appendix 2.
- 3.4.3 Levels of importance in the report are expressed as ranging between the scales of Very High, High, Medium, Low, Negligible and Unknown. The importance of heritage assets is determined firstly by reference to existing designations – for example Scheduled Monuments are already classified as Nationally Important and are therefore of High importance. For assets where no designation has previously been assigned, the likely importance of that resource has been based upon the available evidence and professional knowledge and judgement.
- 3.4.4 The likely magnitude of the impact of the Proposed Development works is determined by identifying the degree of change from the Proposed Development upon the 'baseline' conditions of the Site and the heritage resource identified in the assessment. This impact can be either adverse (negative), beneficial (positive) or neutral and is ranked according to the scale of high, medium, low, negligible or neutral.

Assessment of Setting Impacts

3.4.5 The setting assessment has been undertaken in line with the requirements of NPPF and Historic England setting guidance.

3.4.6 The NPPF definition of setting is set out above in Section 1.3.

3.4.7 In December 2017, Historic England published an updated guidance document on setting as part of their Good Practice Advice Notes intended to explain how to apply the policies contained in the NPPF. This document states:

Setting is not itself a heritage asset, nor a heritage designation, although land comprising a setting may itself be designated. Its importance lies in what it contributes to the significance of the heritage asset or to the ability to appreciate that significance (Historic England 2017, 4).

3.4.8 The Historic England guidance states:

A thorough assessment of the impact on setting needs to take into account, and be proportionate to, the significance of the heritage asset under consideration and the degree to which proposed changes enhance or detract from that significance and the ability to appreciate it (ibid., 2).

3.4.9 The guidance sets out the ways in which setting may contribute to the value of a heritage asset. It advocates a five-stage approach which comprises:

Step 1: Identify which heritage assets and their settings are affected;

Step 2: Assess the degree to which these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated;

Step 3: Assess the effects of the Proposed Development, whether beneficial or harmful, on that significance or on the ability to appreciate it;

Step 4: Explore ways to maximise enhancement and avoid or minimise harm;

Step 5: Make and document the decision and monitor outcomes (ibid., 8).

3.4.10 The guidance provides a checklist of potential attributes of setting which may contribute to or make appreciable the significance of the asset in question. Historic England acknowledges that the checklist is non-exhaustive and that not all attributes will apply in all cases.

3.4.11 The assessment of the impact on setting undertaken for this assessment has followed the staged approach outlined in the Historic England guidance on setting. It has had regard to the checklist therein but, in the interest of being proportionate to the importance of the asset and the potential magnitude of impact, only discusses those attributes which apply to the assets and the potential impacts.

3.4.12 Site visits were undertaken to all designated and locally listed heritage assets within the 500m Study Area, insofar as they were publicly accessible and safe to access. Where assets were not directly accessible, assessments were made from the most appropriate publicly accessible and safe location. These site visits established the current setting of the assets,

how setting contributes to the significance and appreciation of the assets and how the Proposed Development could potentially impact upon setting, such that it could cause harm and affect significance.

- 3.4.13 It is noted that, in many cases identified impacts upon setting are ‘neutral’ and as such, it is not always necessary or appropriate to propose mitigation or enhancement measures. Where relevant, mitigation and enhancement measures are identified as part of this assessment.

Assessment of Physical Impacts

- 3.4.14 The assessment of physical impacts will be undertaken in line with the assessment criteria noted above and in Appendix 2. This will be done by establishing the historic environment baseline through examination of the data sources outlined in Section 3.2 and a walkover survey. The Proposed Development will be assessed against the established historic environment baseline, and potential physical impacts on known and unknown heritage assets will be identified.

Assessment of Harm

- 3.4.15 Where designated heritage assets are concerned, PPG requires an assessment to be made as to the level of harm which could be caused to designated heritage assets by a Proposed Development (DLUHC & MHCLG Live Document, para 18). It requires a judgement to be made as to whether that harm is ‘substantial’ or ‘less than substantial’ (MHCLG 2025, para 212) and the level of harm predicted establishes the planning test to be applied (*ibid.*, paras 214 and 215).
- 3.4.16 Historic England define harm in their Conservation Principles (2008) as a “*change for the worse, here primarily referring to the effect of inappropriate interventions on the heritage values of a place*” (Historic England 2008, 71).
- 3.4.17 The PPG notes that ‘substantial’ harm is a ‘high test’ and that as such it is unlikely to result in many cases (DLUHC & MHCLG Live Document). What matters in establishing whether harm is ‘substantial’ or not, relates to whether a change would seriously adversely affect those attributes or elements of a designated asset that contribute to, or give it, its significance (*ibid.*, para 18).
- 3.4.18 There are no designated heritage assets within the Site and as such will be no physical impacts upon designated heritage assets and no harm. In the case of the Proposed Development the potential for harm relates solely to potential impacts upon the settings of designated assets within the 500m Study Area.
- 3.4.19 Assessment of harm resulting from impacts upon the setting of heritage assets will relate to whether a change would seriously adversely affect those attributes or elements of the setting of an asset that contribute to, or give it, its significance resulting in change for the worse. This will be considered in line with criteria for magnitude of impact in Appendix 2. However, it

should be noted that change will not always lead to harm and that there is potential for beneficial as well as neutral impacts. Where there are beneficial, neutral or no impacts there will be no harm.

4 Archaeological and Historical Evidence

4.1 Chronology

- 4.1.1 The chronological framework below (Table 1) has been employed based broadly on the period divisions defined by the East of England Regional Research Frameworks (2011) and the HER data received from Hertfordshire County Council.

Table 1: Chronology for Time Periods used in Assessment

Period Names		Date Range
Prehistoric	Palaeolithic	Lower & Middle Palaeolithic c.800,000 to c.40,000 BC
		Upper Palaeolithic: c.40,000 to c.8,000 BC
	Mesolithic	Early Mesolithic: c.8,000 to c.6,500 BC
		Later Mesolithic: c.6,500 to c.4,000 BC
	Neolithic	Early Neolithic: c.4,000 to c.2,200 BC
		Middle Neolithic: c.3,400 to c.2,800 BC
		Late Neolithic: c.2,800 BC to c.2,100 BC
	Bronze Age	Early Bronze Age: c.2,100 to c.1,500 BC
		Middle Bronze Age: c.1,500 to c.1,150 BC
		Late Bronze Age: c.1,150 to c.800 BC
Iron Age / Roman	Iron Age	Early Iron Age: c.800 to c.500 BC
		Middle Iron Age: c.500 to c.150 BC
		Late Iron Age: c.150 BC to AD 43
Medieval	Roman / Romano-British	AD 43 to 410
	Early Medieval	AD 410 to 1066
Post-Medieval	High / Late Medieval	AD 1066 to 1500
	Early Post-Medieval	AD 1500 to 1750
	Industrial	AD 1750 to 1900
Modern		AD 1900 to present day

4.2 Prehistoric/Roman

- 4.2.1 There are no prehistoric or Roman heritage assets recorded in the HER within the Site.
- 4.2.2 Within the 500m Study Area there are six finds or features dating to the prehistoric period (Assets 17-21 & 44) and a findspot of pottery that may date to the Late Iron Age or the Roman period (Asset 22).
- 4.2.3 The Icknield Way (Asset 21), situated 220m to the northwest of the Site at its closest point is an ancient trackway that extends along the Chiltern ridge. It dates from the Early Neolithic Period to the Late Iron Age and was partly updated in the Roman period.
- 4.2.4 In 1927 a quantity of pottery was found in Newells Road, Letchworth (Asset 22), situated 413m to the northeast of the Site. Although believed to be Roman pottery, the quality was poor and could also indicate a Late Iron Age date.
- 4.2.5 Three further findspots of possible Roman date; Samian and Castor ware dating to the mid 2nd to the 4th century AD (Asset 23); a coin of Vespasian (Asset 24) and a possible Roman Annular

Ornament (Asset 25) have also been found in the 500m Study Area. Of these findspots the closest to the Site is the coin of Vespasian (Asset 24) at a distance of 259m to the southeast.

- 4.2.6 There is considered to be a Low potential for previously unrecorded prehistoric or Roman evidence to be present within the Site, particularly given the redevelopment of the Site in the 20th and 21st centuries. However, it should be noted that whilst there is a paucity of evidence, there have been no specific archaeological investigations carried out within the Site or the 500m Study Area, and so the absence of evidence could reflect a genuine absence of activity or could be as a result of a lack of archaeological research in the area.

4.3 Medieval

- 4.3.1 There are no medieval heritage assets recorded within the Site.
- 4.3.2 Within the 500m Study Area there is only one find or feature dating to the medieval period. During the construction of Letchworth Garden City a group of burials was found while digging sewers on the Quadrant. This burial ground is marked by Asset 26 at a distance of 341m to the northeast of the Site. The burial ground is just south of the Icknield Way (Asset 21) and the historic parish boundary. Skeletons in graves and cremations in urns were uncovered, accompanied by ironwork and bronze objects. Several horses were also recorded as buried in large pits some with stirrups and other horse gear. Although these horse burials were in the same area it is not clear if they are the same date as the cemetery.
- 4.3.3 The medieval settlement of Letchworth, situated roughly 2.5km to the south of the Site had a recorded population of 15 households in the Domesday Book of 1086 (Powell-Smith, 2026: Letchworth).
- 4.3.4 Due to the paucity of medieval evidence within the 500m Study Area, there is considered to be a Low potential for any previously unrecorded medieval archaeological remains to be present within the Site, particularly given the redevelopment of the Site in the 20th and 21st centuries. Any such remains could range from Negligible to High importance (especially if there were any surviving early medieval remains), depending on the nature, form and extent of their survival.

4.4 Post-Medieval

- 4.4.1 There are no Post-medieval finds or features recorded within the Site.
- 4.4.2 There are two Post-medieval finds or features within the 500m Study Area, the Railway Bridge at Spring Lane (Asset 28) and the Great Northern Railway: Cambridge Branch (Asset 45). The railway line is situated 20m to the north of the Site.
- 4.4.3 Early pre-Ordnance Survey maps of the Site tend to be schematic and lacking in detail, although they give some idea of the nature of settlement in the surrounding area. The earliest maps of the region, such as those by Saxton (1579, Figure 3) and Blaeu (1665, not illustrated) show very little detail of the region. Saxton's map depicts Hitchin (labelled as "*Hytchin*") and medieval Letchworth (labelled as "*Letchworthe*"). This allows the Site to be approximately

located on Saxton's map near a dashed line which probably represents the old parish boundary, just to the north of the Site. However, no details are depicted within the vicinity of the Site.

- 4.4.4 As cartographic techniques progressed in the 19th century with the Ordnance Survey maps, more detail around the Site can be seen. The Ordnance Survey Old Series published in 1834 (Figure 4) shows the Site in a field of an unspecified agricultural nature immediately to the south of the Great Northern Railway: Cambridge Branch (Asset 45).
- 4.4.5 The Tithe map of 1839 (not illustrated) shows that the Site is within Plot 42 called "*The Leys*" which was in use as a "*Meadow*" indicating its pastoral use.
- 4.4.6 The Ordnance Survey maps of 1884 (Figure 5) and 1899 (Figure 6) show the Site in a clearer cartographic resolution than the Ordnance Survey Old Series published of 1834 (Figure 4). However, no further details are depicted within the Site or its nearby vicinity.
- 4.4.7 The possibility of remains or artefacts from the post-medieval period being present on the Site cannot be discounted. Whilst this has been considered, on balance, due to the absence of known finds or features dating to this period within proximity of the Site, the potential for post-medieval remains or artefacts to be present on the Site is considered to be Low. Any remains would likely be related to the agricultural use of the Site and as per Table 1 of Appendix 2 would likely be considered to be of Negligible importance.

4.5 Modern

- 4.5.1 With the exception of the extant Morrisons car park there are no modern features recorded within the Site.
- 4.5.2 Twenty five modern heritage assets are within the 500m Study Area including one Grade II* Listed Building (Asset 2), 14 Grade II Listed Buildings (Assets 3-14 & 42-43) and the Registered Park and Garden of Broadway (Asset 17, List Entry No. 1000908).
- 4.5.3 The closest of the Listed Buildings to the Site is the Grade II* Listed Spirella Building (Asset 2, Listed Building No. 1347670) constructed in 1912 and further extended in 1913 to 1914 and 1919 to 1920.
- 4.5.4 The Registered Park and Garden of Broadway (Asset 16, List Entry No. 1000908) is situated 88m to the northeast of the Site at its closest point.
- 4.5.5 Letchworth Garden City is the world's first Garden City representing Ebenezer Howard's principles of uniting the benefits of town and country in a newly designed settlement. Howard chose Letchworth Manor in 1903 as the basis for the new settlement. The estate was situated between the settlements of Hitchin and Baldock. It contained medieval Letchworth and was mostly to the south of the Great Northern Railway: Cambridge Branch (North Herts Council, 2001: 6; Asset 45).

- 4.5.6 The 1,014 acres of land was too small for the planned settlement and other assets were also purchased near Baldock, Willian and Norton which allowed the First Garden City Ltd to be registered on the 1st of September 1903 (North Herts Council, 2001: 6).
- 4.5.7 Letchworth Garden City utilised an existing line of trees for the main axis of Broadway and Letchworth Conservation Area appraisal records that many of these trees remain lining the road (North Herts Council, 2001: 7). This axis runs at an angle from Hitchin Road through the area that was reserved for the Town Square to the railway station. The Town Square was never built and remains as an open square within Broadway.
- 4.5.8 The Ordnance Survey mapping from 1925 (Figure 7) shows the Site in an area of open ground to the west of three plots of land containing a Bank, Police Station, and a Sunday School with associated Church. The northwest edge of the Site fronts on to Station Way/Station Place matching its current configuration.
- 4.5.9 The Ordnance Survey map of 1973 (Figure 8) shows that the Site is developed, albeit as a “Car Park”. Residential housing borders the Site to the west and the Bank and Police Station remain in plots of land to the east. The Broadway Hotel is also depicted on this map (labelled “Hotel”).
- 4.5.10 Given the size of the Site itself and the redevelopment of the Site as a car park in the later 20th and early 21st century there is considered to be a Low potential for any previously unrecorded modern archaeological remains to be present within the Site. Any such remains would likely be related to the use of the site as a car park and be considered to be of Negligible importance.

4.6 Previous Archaeological Events

- 4.6.1 There are no records of any previous archaeological events in the HER within the Site.
- 4.6.2 Within the 500m Study Area three building recording surveys have been undertaken (Events 38 & 40-41) and one archaeological evaluation (Event 39).
- 4.6.3 The evaluation at Broadwater Dale Garages (Event 39) was undertaken in 2010 at a distance 419m to the southwest of the Site and consisted of three long trial trenches. Only modern land drains were revealed along with some hydrocarbon contamination from the garages.

4.7 Aerial Imagery

- 4.7.1 Aerial photographs available on Historic England’s online Aerial Photo Explorer, the National Collection of Aerial Photographs (NCAP) website and Britain from Above show the Site and surrounding area from 1951 to 1996. These photographs confirm the depiction of the Site as seen on the historic maps as discussed above. No previously unrecorded features were seen on the photographs.

- 4.7.2 Historic satellite imagery provided by Google Earth™ shows the Site from December 2000 to February 2025. The satellite imagery shows the Site as part of the car park since at least December 2000. No previously unrecorded features were seen on the satellite imagery.

4.8 Walkover and Setting Assessment Survey

- 4.8.1 A walkover survey of the Site was undertaken to confirm land use on Site and with the aim of identifying any previously unknown remains. The survey took place on the 27th of July 2026 in clear, sunny weather with good visibility in all directions.
- 4.8.2 The walkover survey confirmed the current level of development within the Site (Plates 1-4). Three of the EV charging stations had the floodlight poles installed but no floodlights fitted. The proposed Airserv Air Unit, an Airserv Vacuum Unit two and new valeting bays had also not been installed.
- 4.8.3 The walkover survey confirmed the extremely limited level of intervisibility of the Site from beyond its immediate vicinity due to intervening buildings and vegetation (Plates 1-6).
- 4.8.4 No previously unrecorded features were seen on the walkover survey.
- 4.8.5 A Setting Assessment Survey was also undertaken on the 27th of July 2026. Visits were undertaken to every identified heritage asset, insofar as they were publicly accessible and safe to access, in order to confirm the potential for setting impacts. Where assets were not directly accessible, they were assessed from the most appropriate publicly accessible and safe location. In most cases intervening topography, built structures and vegetation was noted to completely obscure any potential intervisibility. Assets that were not found to have any intervisibility with the Site have been scoped out of this assessment. The results of the setting assessment are discussed in Section 5.

5 Setting and Character Assessment

5.1 Setting Assessment Criteria

- 5.1.1 This section considers the potential for the Proposed Development to result in impacts upon the character or settings of designated and locally listed heritage assets within 500m of the Site. This includes consideration of whether any such change would constitute an adverse impact (diminishment) to those attributes of the designated assets which directly contribute to their significance rather than simply being an alteration to, or addition of a new element to the existing character or settings of these assets. Where a new development may be located within the setting of an asset but does not diminish the significance of the asset or the ability to appreciate that significance, it may have a neutral impact. This is in line with the NPPF definition of setting which states that “*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*” (MHCLG 2025, Glossary).
- 5.1.2 The assessment considers all designated and locally listed heritage assets within 500m of the Site. Visits were undertaken to every identified heritage asset, insofar as they were publicly accessible and safe to access, in order to confirm the potential for character and setting impacts. Where assets were not directly accessible they were assessed from the most appropriate publicly accessible and safe location. In most cases intervening topography, built structures and vegetation was noted to completely obscure any potential intervisibility. Where vegetation has been listed as a screening factor it should also be noted that the survey was undertaken in July and that in autumn and winter months the level of screening provided will likely be lower.
- 5.1.3 This assessment found that there was little to no intervisibility between the Site and designated heritage assets within the 500m Study Area. The only designated heritage assets with potential for intervisibility with the Site are the Grade II* Listed Spirella Building (Asset 2, Listed Building No. 1347670) at a distance of 81m to the northwest and Letchworth Conservation Area (Asset 1).

5.2 Asset Considered for Setting Assessment

The Spirella Building, associated fountain, lamp standards and steps (Asset 2, Grade II Listed Building No. 1347670)*

- 5.2.1 The Spirella Building was built as an Arts & Crafts clothing factory in 1912. It was extended between 1913 to 1914 and further extended between 1919 to 1920. The building is now in use as commercial offices.
- 5.2.2 From within the car park at Morrisons adjacent to the main portion of the Site the upper storey of the Spirella Building is visible (Plate 2). However, intervening trees would severely inhibit any intervisibility of the floodlights of the Proposed Development from the upper storey of the Spirella Building (Plate 3).

- 5.2.3 The Proposed Development would therefore present, at worst, a barely perceptible change to the setting of the Grade II* Listed Building, and that change would not diminish or enhance the significance of the asset or the ability to appreciate its significance resulting in a Neutral impact.

Letchworth Conservation (Asset 1)

- 5.2.4 As stated in Section 1.5 previous Planning Application 25/00466/FP noted the location of the Site within Letchworth Conservation Area (Asset 1)
- 5.2.5 Letchworth Conservation Area was first designated in December 1974 with amendments made in 1990. It is the World's First Garden City and represents the principles of Ebenezer Howard in uniting the benefits of town and country in a newly designed settlement. Howard's principles are clearly shown in the layout of Letchworth from the Master Plan to individual housing layouts and are a vital consideration in understanding the special interest and character of the Conservation Area. (North Hertfordshire District Council, Letchworth Conservation Area, 2001, paras 2.1 & 2.2)
- 5.2.6 The Proposed Development would be within the existing car park of Morrisons Supermarket. The current supermarket and its associated infrastructure does not significantly detract from the heritage significance of Letchworth Conservation Area. The Proposed Development would not add an incongruous, intrusive element within the existing car park of Morrisons Supermarket.
- 5.2.7 The Proposed Development would therefore present, at worst, a barely perceptible change to the setting of Letchworth Conservation Area. Therefore it is considered that the character and appearance of the Conservation area would be preserved, and that the proposal would not conflict with Local Plan Policies SP13 and HE1.

5.3 Summary of Harm

- 5.3.1 With the exception of the Grade II* Listed Spirella Building and Letchworth Conservation Area (Asset 1) the Proposed Development has been assessed as having no impacts upon the settings or character of designated assets within the 500m Study Area and therefore there is no mitigation required.
- 5.3.2 A Neutral level of impact has been predicted upon the setting of the Grade II* Listed Spirella Building. Therefore no harm to the Spirella Building is predicted, as the Proposed Development would neither diminish or enhance the ability to appreciate its significance. Thus the policy tests as set out in NPPF are not invoked and no mitigation is proposed beyond that inherent to the design (i.e. proposed screening etc.)
- 5.3.3 A Neutral level of impact has been predicted upon the setting of Letchworth Conservation Area (Asset 1). Therefore no harm to Letchworth Conservation Area (Asset 1) is predicted. Thus the policy tests as set out in NPPF are not invoked and no mitigation is proposed beyond that inherent to the design (i.e. proposed screening etc.)



6 Impacts and Mitigation

6.1 Physical Impacts

- 6.1.1 Potential physical impacts on known or unknown buried archaeological remains which may survive relate to the possibility of disturbing, removing, or destroying in situ remains and artefacts during ground-breaking works (including excavation, construction, and other works associated with the Proposed Development) on this Site. In the context of this development, physical impacts have the capacity to result in impacts of high magnitude as they could potentially result in the destruction or removal of any archaeological deposits which may be present.
- 6.1.2 This assessment has found there is a Low potential for previously unidentified archaeological remains of all periods to be found within the Site. The Site was likely undeveloped agricultural land prior to the construction of Letchworth Garden City in the 20th century and its development as a car park in the latter half of the 20th century.
- 6.1.3 However, it should be noted that there have been no archaeological investigations carried out within the Site and limited archaeological investigations carried out in the 500m Study Area. Therefore, the absence of evidence could reflect a genuine absence of activity or could be as a result of a lack of archaeological research in the area. Any archaeological remains that were to be found could be of Negligible to High importance, dependant on the form and extent of their survival.
- 6.1.4 However, any further physical impacts within the Site would be limited to the addition of one single head floodlight, an Airserv Air Unit, an Airserv Vacuum Unit and the addition of two new valeting bays. These would result in a Negligible impact upon any buried archaeology within the Site, given the limited footprint of the ground breaking required to install them.

6.2 Settings and Character Impacts

- 6.2.1 All designated and locally listed heritage assets within the 500m Study Area were considered for potential impacts to their character or setting as a result of the Proposed Development. This has included consideration of whether any such change would constitute an adverse impact (diminishment) to those attributes of the designated assets which directly contribute to their significance rather than simply being an alteration to, or addition of a new element to the existing settings of these assets. The character and setting assessment was undertaken in line with the requirements of NPPF and Historic England setting guidance.
- 6.2.2 The Proposed Development has been assessed as having No impacts on all designated assets with the exception of the Grade II* Listed Spirella Building (Asset 2, Listed Entry No. 1347670). The Proposed Development would present, at worst, a barely perceptible change to the setting of the Spirella Building, but that change would not diminish or enhance the significance of the asset or the ability to appreciate its significance resulting in a Neutral impact.

- 6.2.3 A Neutral level of impact has been predicted upon the setting of Letchworth Conservation Area (Asset 1). Therefore no harm to Letchworth Conservation Area (Asset 1) is predicted. Thus the policy tests as set out in NPPF are not invoked and no mitigation is proposed beyond that inherent to the design (i.e. proposed screening etc.)

6.3 Mitigation

- 6.3.1 National planning policies and planning guidance contained within the National Planning Policy Framework (MHCLG 2025), Planning Practice Guidance (DLUHC & MHCLG Live Document), as well as local plan policies, require a mitigation strategy that is designed to take cognisance of the possible impacts upon heritage assets by a Proposed Development on the Site and avoid, minimise, or offset any such impacts as appropriate. It is noted that the NPPF states that a local planning authority should require developers to “*record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact*” (MHCLG 2025, para 218).
- 6.3.2 This assessment has found there is a Negligible potential for physical impacts as a result of the Proposed Development. In accordance with national and local planning policies on heritage, it is advised that North Herts Council may require an archaeological investigation by non-intrusive and/or intrusive methods to further investigate the potential for archaeological finds or features to remain on the Site. Such mitigation would probably take the form of an archaeological Watching Brief. Any such requirement would be determined in consultation with North Herts Council.
- 6.3.3 With the exception of the Grade II* Listed Spirella Building the Proposed Development has been assessed as having no impacts upon their settings or character and therefore there is no mitigation required.
- 6.3.4 As the Proposed Development would present, at worst, a Neutral impact on the setting of the Grade II* Listed Spirella Building (Asset 2, Listed Entry No. 1347670) and Letchworth Conservation Area (Asset 1). No harm is predicted in terms of the NPPF. Thus the policy tests as set out in NPPF are not invoked and no mitigation is proposed beyond that inherent to the design (i.e. proposed screening etc.)

7 References

7.1 Bibliographic References

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7.2 Cartographic References

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Ordnance Survey, 1899. *Hertfordshire Sheet VII.NE*, Revised: 1897, Published: 1899

Ordnance Survey, 1899. *Hertfordshire Sheet VII.SE*, Revised: 1896 to 1897, Published: 1899

Ordnance Survey, 1899. *Hertfordshire Sheet VII.SW*, Revised: 1896 to 1897, Published: 1899

Ordnance Survey, 1922. *Bedfordshire Sheet XXVII.10*, Revised: 1921, Published: 1922

Ordnance Survey, 1925. *Hertfordshire Sheet VII.SE*, Revised: 1921, Published: 1925

Ordnance Survey, 1925. *Bedfordshire Sheet XXVII.SW*, Revised: 1921, Published: 1925

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Ordnance Survey, 1970. *TL23 – B//**. Revised: 1901 to 1968, Published: 1956, Reprinted: 1970

Ordnance Survey, 1973. *TL2032-TL2131 – AA*, Revised: 1968, Published: 1973

7.3 Aerial Photography

The following aerial photographs were viewed online in July 2026 using Historic England's online Aerial Photo Explorer, Britain from Above and the National Collection of Aerial Photographs (NCAP) website:

Date	Sortie/Flight Reference	Photo Number	Type	Link
19 Feb 1951	EAW034697	N/A	Oblique	Aerial Photo Historic England
03 May 1972	HSL/UK/72/0052	0409	Vertical	Image Details - Air Photo Finder - NCAP
22 June 1981	HSL/BEDS/81/0001	8600	Vertical	Image Details - Air Photo Finder - NCAP
18 July 1996	AF/96C/0565	1785	Vertical	Image Details - Air Photo Finder - NCAP



Plates



Plate 1: View west of the Site



Plate 2: View northwest of the Site; upper storey of Grade II* Listed Spirella Building Asset 2, Grade II* Listed Building No. 1347670) in view



Plate 3: View west of the Site; upper storey of Grade II* Listed Spirella Building (Asset 2, Grade II* Listed Building No. 1347670) in view



Plate 4: View south of the Site from northern entrance of Morrisons Car Park



Plate 5: View southwest of the Site from northern entrance of Morrisons Car Park



Plate 6: View northeast from northern entrance of Morrisons Car Park

Figures

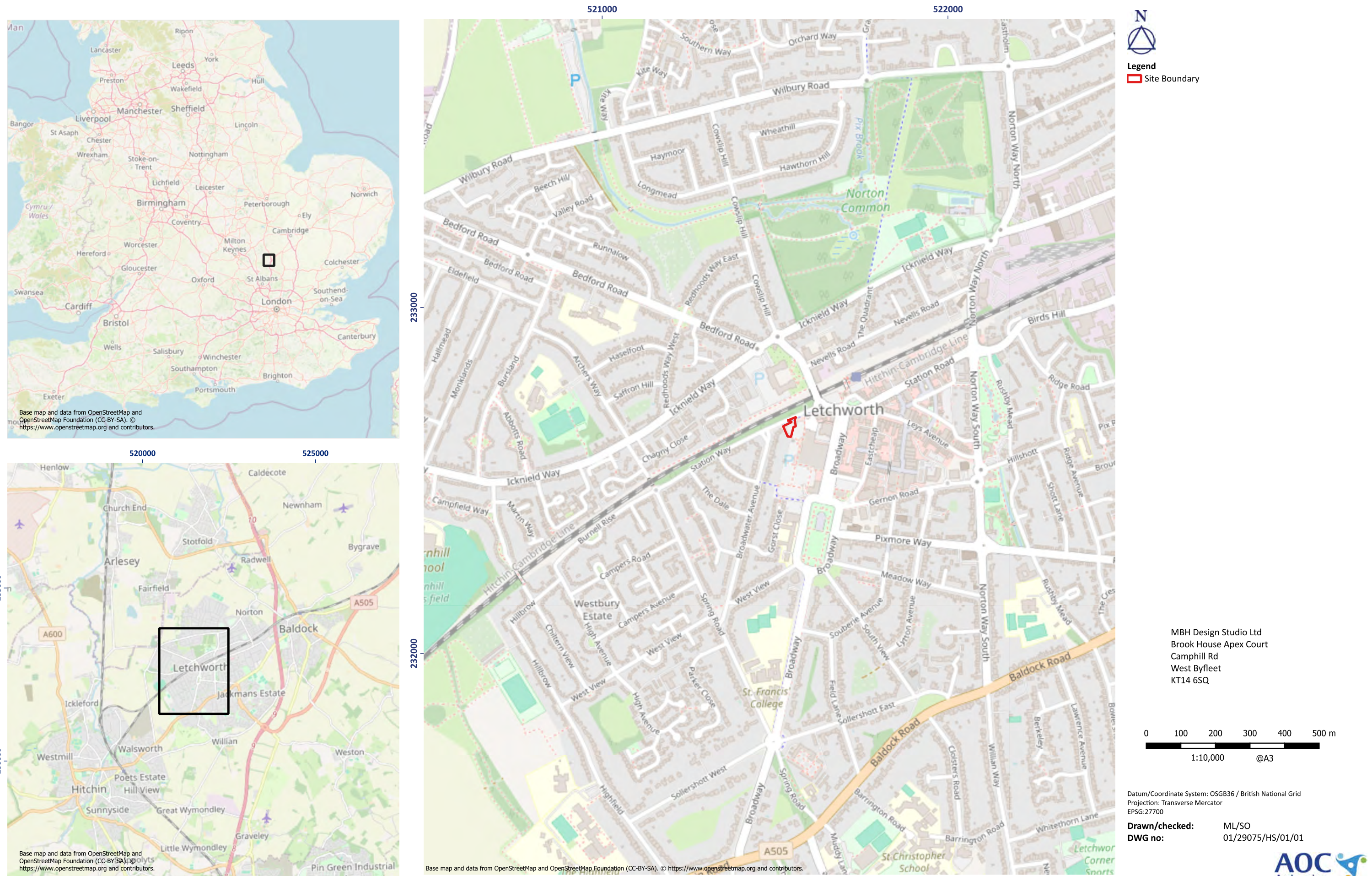


Figure 1: Site Location

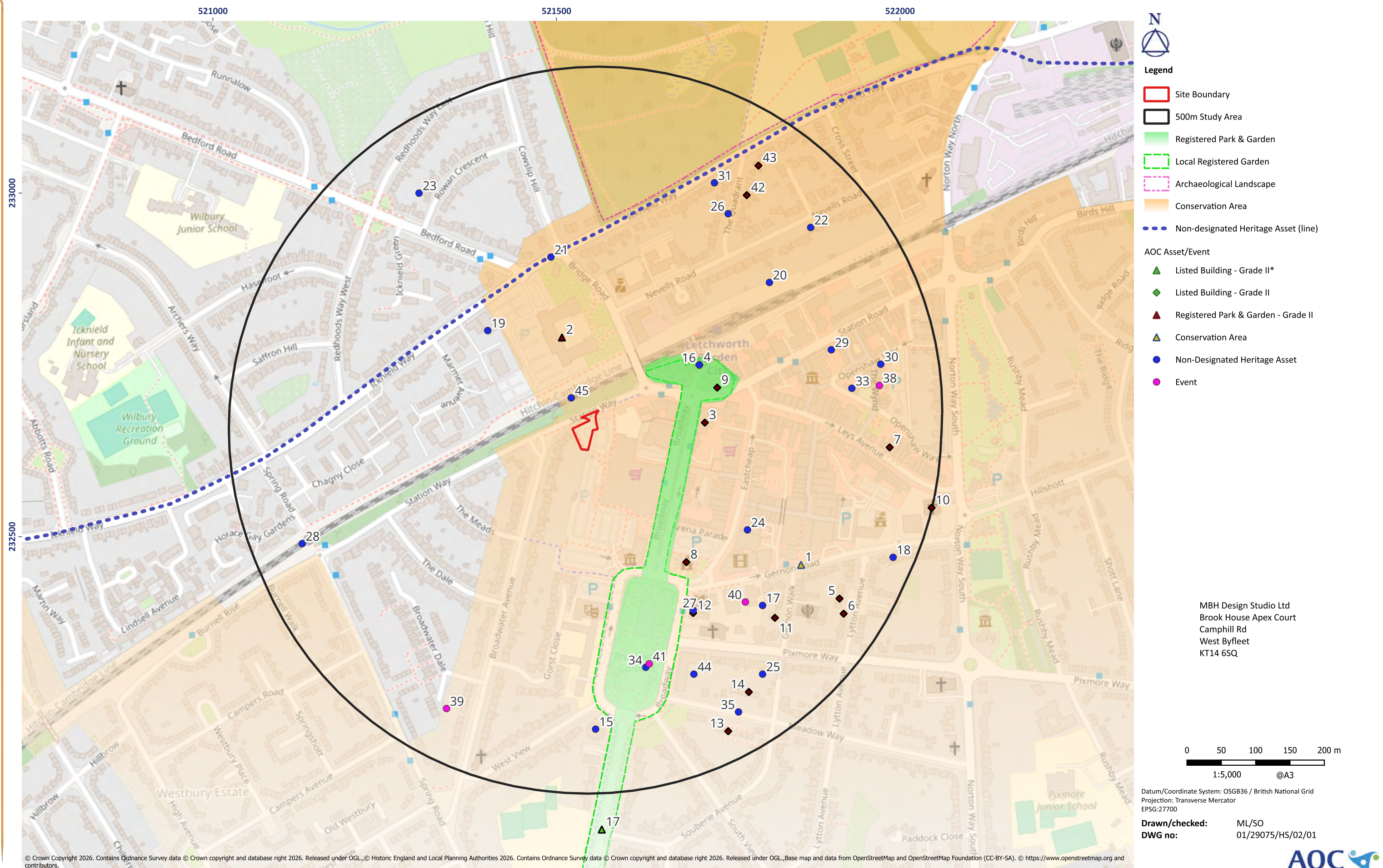


Figure 2: Heritage Assets and the 500m Study Area



Legend

Approximate Site Location

MBH Design Studio Ltd
Brook House Apex Court
Campill Rd
West Byfleet
KT14 6SQ

Not To Scale, Approximate North

Drawn/checked: ML/SO
DWG no: 01/29075/HS/03/01

Figure 3: Extract from a map by Saxton, 1574

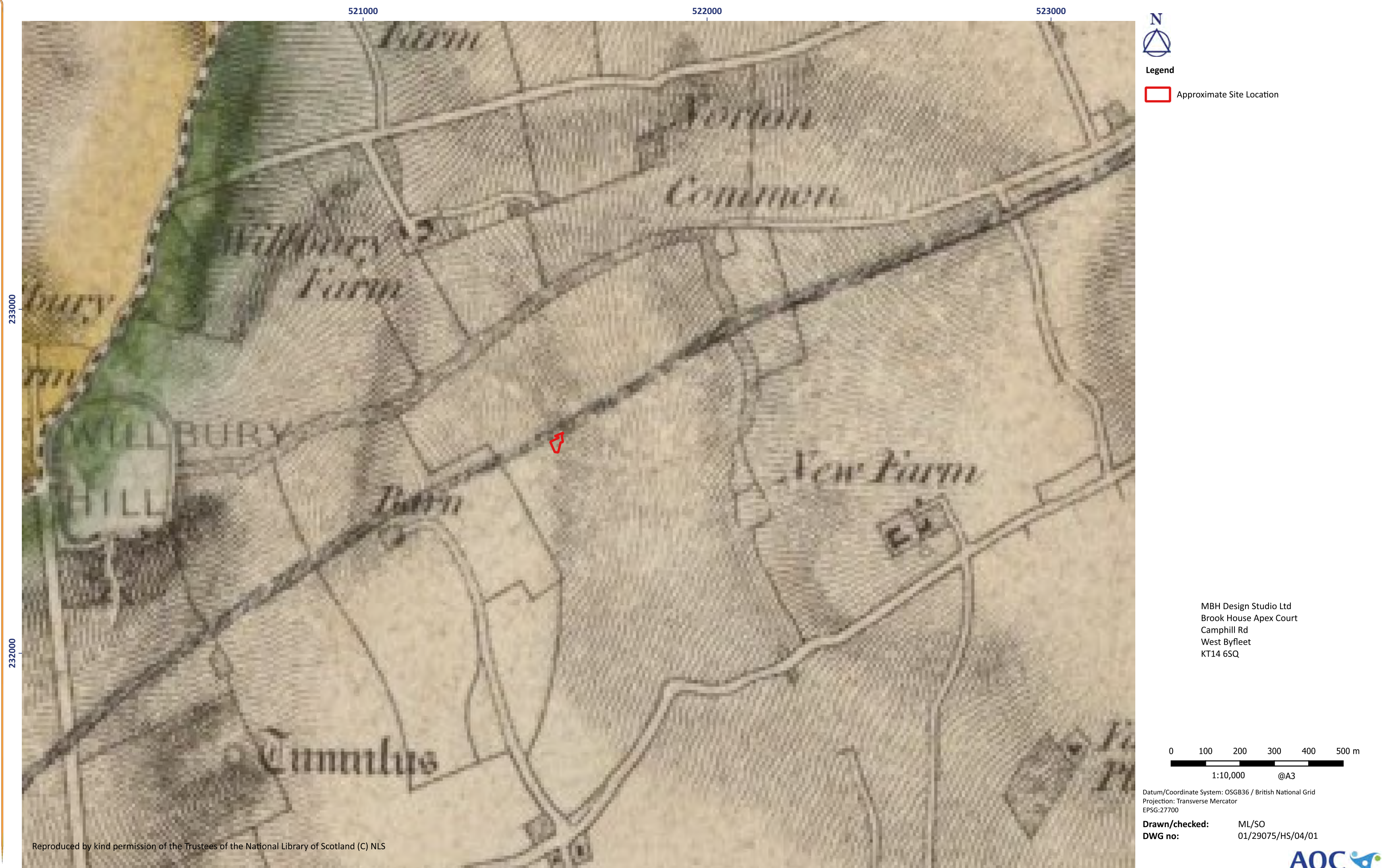


Figure 4: Extract from Ordnance Survey Old Series mapping, 1834

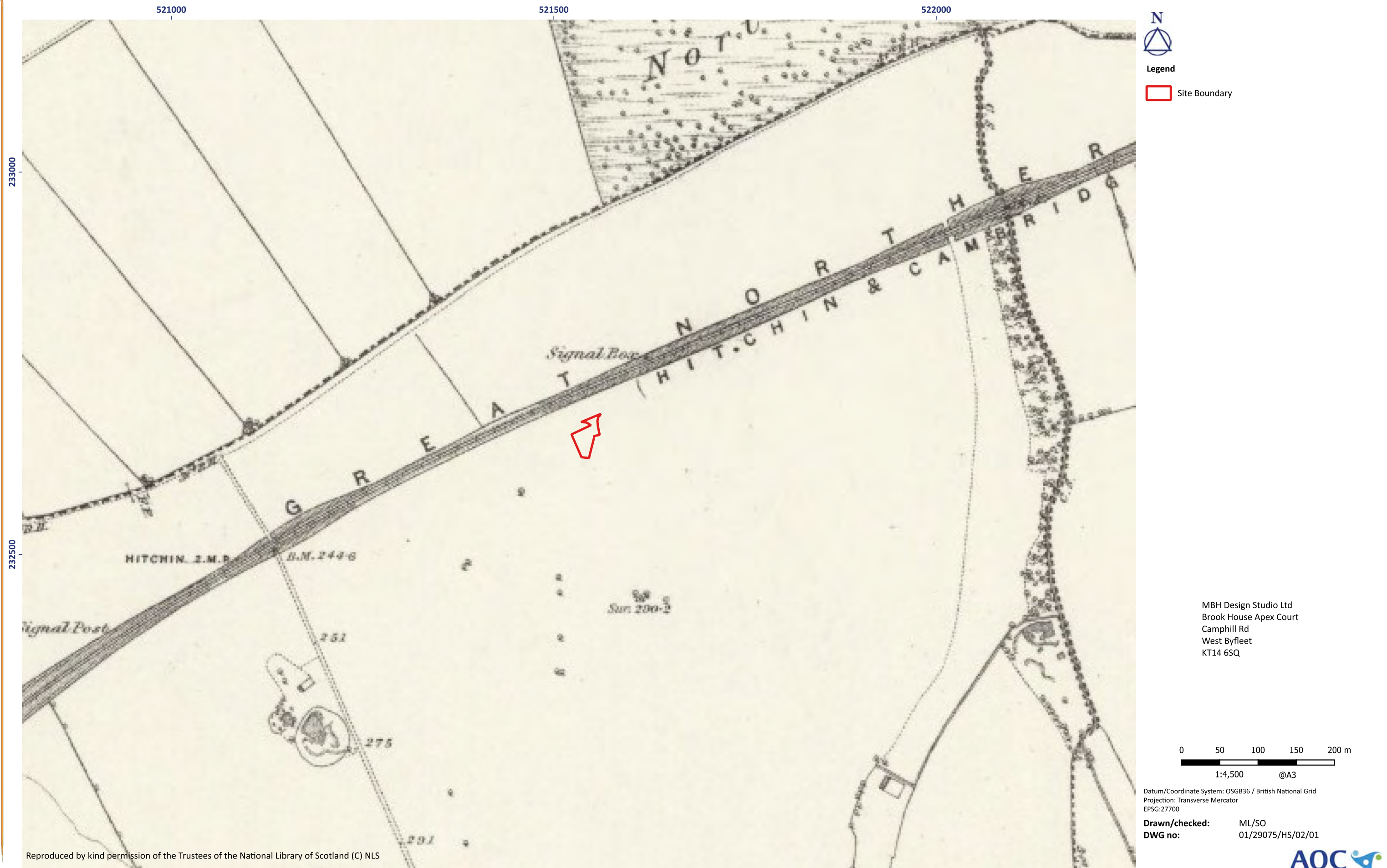


Figure 5: Extract from Ordnance Survey map, 1884

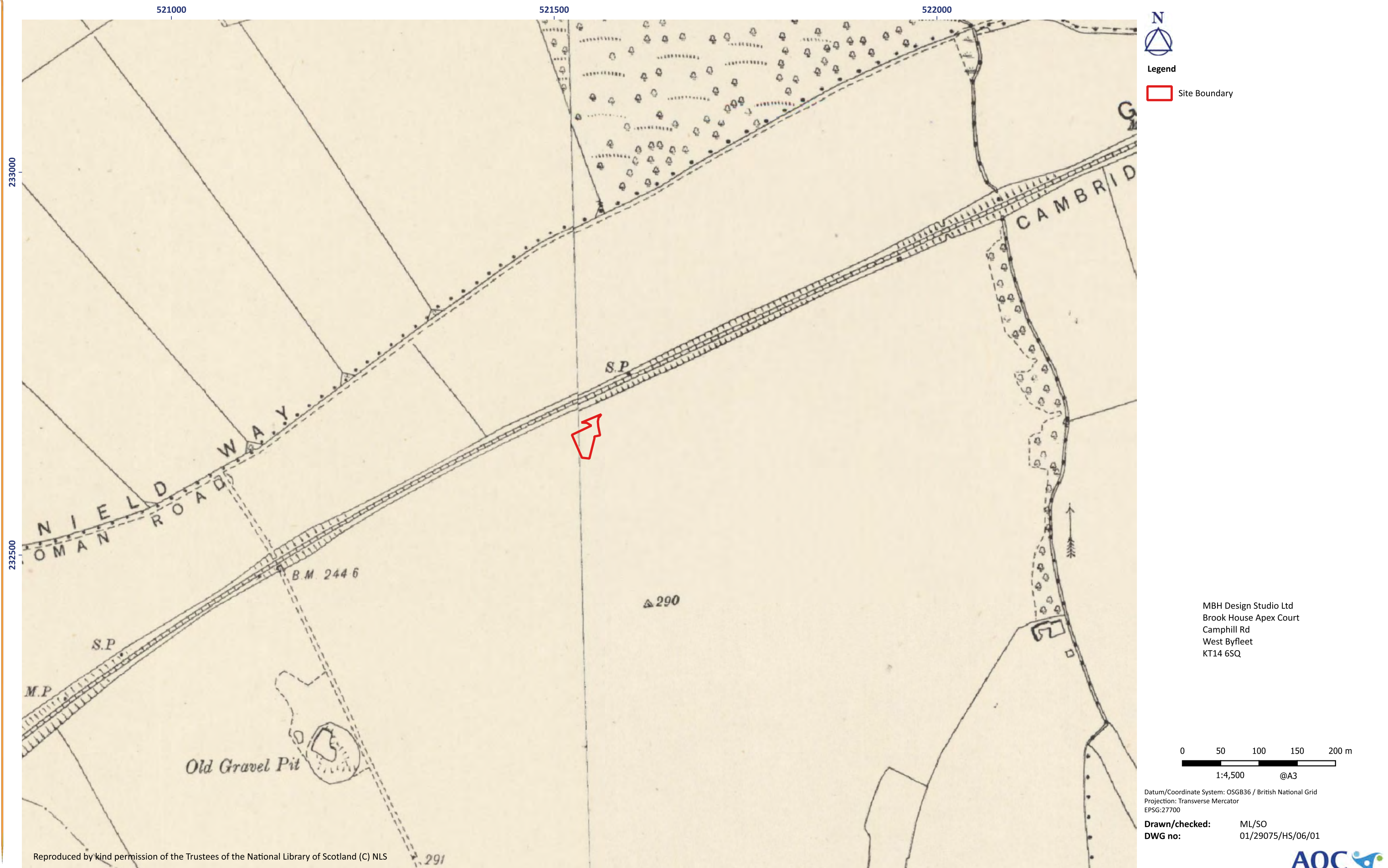


Figure 6: Extract from Ordnance Survey map, 1899

233000

232500

521500

522000



Legend

Site Boundary

MBH Design Studio Ltd
Brook House Apex Court
Camphill Rd
West Byfleet
KT14 6SQ

0 50 100 150 m
1:3,000 @A3

Datum/Coordinate System: OSGB36 / British National Grid
Projection: Transverse Mercator
EPSG:27700

Drawn/checked: ML/SO
DWG no: 01/29075/HS/07/01

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Figure 7: Extract from Ordnance Survey mapping, 1925

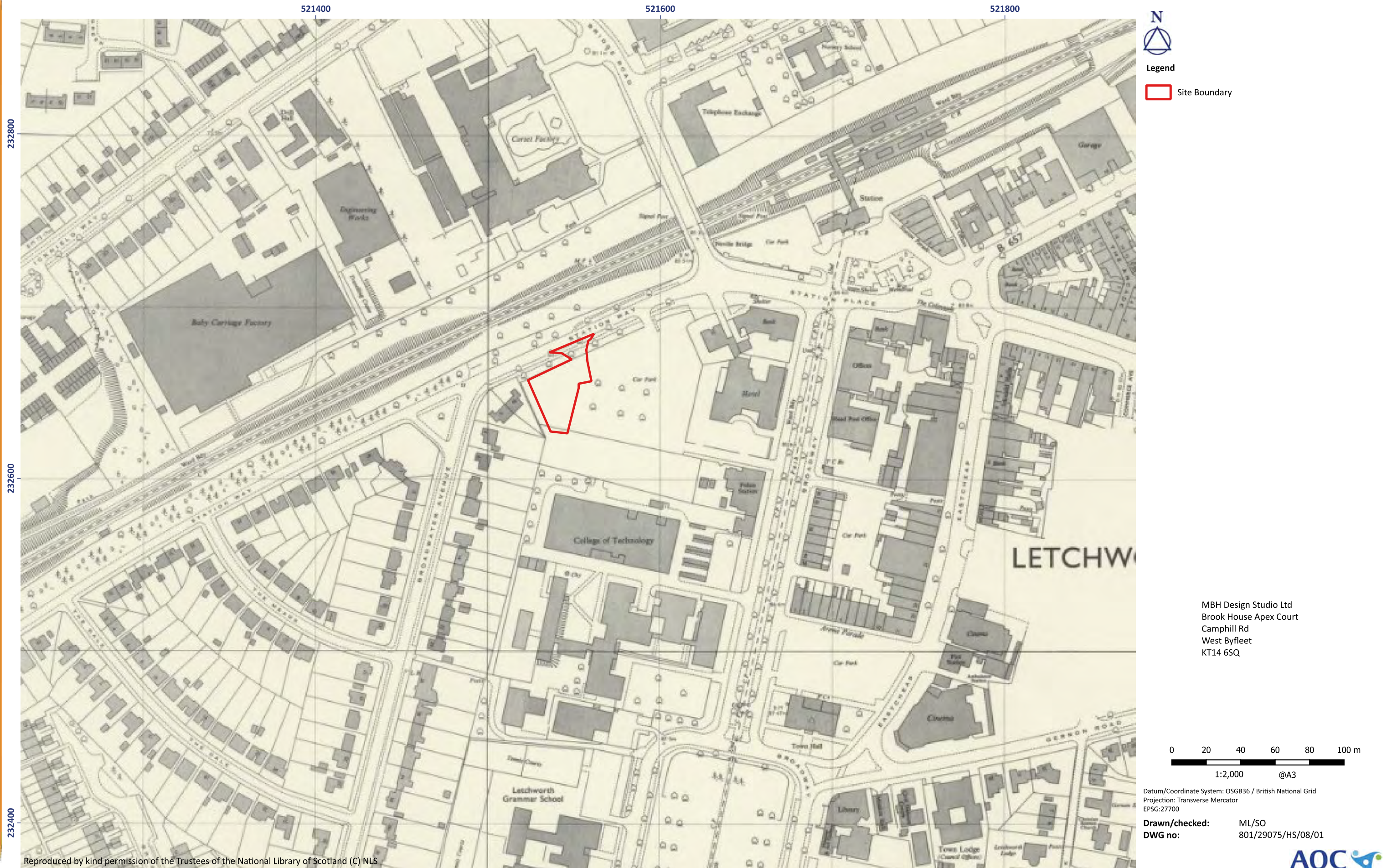


Figure 8: Extract from Ordnance Survey map, 1973

Appendix 1. Gazetteer of Heritage Assets

Asset / Event Number	Asset / Event Name	Status	NHLE / HER Reference	Type of Asset / Event	Period	Easting	Northing	Description
1	Letchworth Conservation Area	Conservation Area	N/A	Conservation Area	N/A	521856	232459	The Conservation Area was first designated in 1974 and comprises eight Character Areas: Area One - The Cheap Cottage Exhibition and Early Grouped Layouts; Area Two - The Glebe Lands - Common View, Glebe Road, North Avenue and Green Lane and part of Icknield Way; Area Three - Early Pioneer Estates – Pix Estate, Ridge Road, Birds Hill, Rushby Mead, Ridge Avenue, Shott Lane; Area Four - Small Middle Class housing and The 1907 Exhibition; Area Five - Post 1914 Estates - Jackmans Place, Campers Estate, The Crescent, Pixmore Way and Rushby Mead; Area Six - Larger Garden City Housing - The Glade, Broadway and part of Pasture Road; Area Seven - Letchworth Lane and Area Eight - Campfield Way and Highover Road. Letchworth is the World's First Garden City and represents the principles of Ebenezer Howard in uniting the benefits of town and country in a newly designed settlement. Howard's principles are clearly shown in the layout of Letchworth from the Master Plan to individual housing layouts and are a vital consideration in understanding the special interest and character of the Conservation Area. Howard went one step further than other housing reformers at the turn of the 20th century and worked with his pioneering company, to purchase an undeveloped estate and began to layout a complete settlement including housing, industry and open spaces. Being the first Garden City in the world Letchworth has international influence on Town Planning. Letchworth set new environmental and architectural

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								standards for the 20 th century particularly in regard to housing design and layout.
2	The Spirella Building, Associated Fountain, Lamp Standards And Steps	Listed Building - Grade II*	1347670 / 16561 - MHT16561	Clothing Factory	Modern	521508	232790	Clothing Factory. Monumental 1912-22 Arts & Crafts factory complex, a key feature of the Garden City, designed by Cecil Horace Hignett (1879-1960), built in the Arts and Crafts style in 1912, extended 1913-14, and further extended in 1919-20. Now in use as commercial offices.
3	Garden City Corporation Offices	Listed Building - Grade II	1347671	Corporation Offices	Modern	521716	232666	BROADWAY 1. 5255 (east side) Garden City Corporation Offices TL 2132 8/27 II 2. 1913 by B Parker and R Unwin. Office building in a classical style akin to New England colonial work. It appears to have started the Neo-Georgian fashion in the town centre. Three storeys and dormers. Symmetrical facade with slightly projecting end and central bays. Fenestration 1:4: :4:1. Hipped, tiled roof with brick stacks and central wooden cupola with clock below. Brown brick with eaves cornice and second floor sill string. Rendered ground floor with Tuscan pilasters carrying entablature. Open loggia at north end. Gauged flat brick arches to sash windows with exposed boxing and glazing bars. Round-arched opening to ground and first floor of central bay

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4	Booking Hall, Public Rooms, Offices And Footbridge At Letchworth Station	Listed Building - Grade II	1174849	Train Station Booking Hall	Modern	521708	232750	This former Great Northern Station replaced a temporary station built in 1904. Arts and Crafts manner. One and a half storeys. Symmetrical front with recessed entrance between splayed bays. Tiled roof with red brick stacks with moulded caps. Red brick walls with eaves cornice and half-timbered gable with brick nogging at south-west end. Flat-topped, 6-light dormer over entrance. Gauged segmental brick arches to recessed sash windows. Segmental-arched entrance to booking hall below wooden canopy. Adjacent entrance porch to office with architraved doorway and battlemented parapet. Bay windows flanking entrance with panelled parapet surmounted by balls. Lifts on footbridge in the form of towers with pyramidal roofs. Two storey booking hall decorated in Art Nouveau manner with exposed timber work.
5	7-17, Lytton Avenue	Listed Building - Grade II	1101997	Terraced Housing	Modern	521912	232410	1907 by C M Crickmer. Terrace based on cottage vernacular models. Awarded first prize in class III of the 1907 Urban Cottages Competition. Two storeys, one window each. Symmetrical facade with Nos 9 and 15 with projecting gabled bays. Half hipped tiled roofs with multi-form brick stack. Roughcast walls. Tile-hung gables jettied over 6-light bay windows to Nos 9 and 15. Ripped dormers. Four-light mullioned windows with glazing bars and tile labels. Boarded doors
6	19-25, Lytton Avenue	Listed Building - Grade II	1174364	Terraced Housing	Modern	521918	232388	1907 by Courtenay Crickmer. Terrace based on cottage vernacular models. Exhibited in the 1907 Urban Cottages Exhibition. Two storeys. Two windows each. Symmetrical facade with jettied, paired bays to first floor. Tiled roofs with roughcast stacks. Roughcast wall with tile string at first floor level. Tile-hung, bracketed jetties. Two and three light casement windows with glazing bars. Boarded doors. Included for group value.

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7	52-58, Leys Avenue	Listed Building - Grade II	1101996	Parade of Shops	Modern	521985	232630	1909 by Allen Foxley. Parade of shops with living accommodation above. Two storeys. Symmetrical facade with 3 projecting pedimented entrance bays. Fenestration 1:2:2:2:2:1. Tiled roofs with brick stacks. Roughcast walls with brick dressings and pilaster strips on quoins. Three-light, transom and mullion casement windows with glazing bars; entrance bays with paired oriel windows. Arched entrances flanked by brick pilasters. Central pediment with ornamental plasterwork incorporating the date 1909.
8	Town Hall	Listed Building - Grade II	1393610	Town Hall	Modern	521689	232463	Letchworth Town Hall is designated for the following principal reasons. * It is the primary civic building in Letchworth constructed by Bennett and Bidwell, noted architects with many listed buildings amongst their oeuvre. * Located in a prominent position in the townscape, it has strong historic interest as the Town Hall of the first Garden City, arguably the most influential town planning development of the C20. * It has a balanced and well-tutored, external architectural presence comparable in architectural quality to other contemporary Town Halls of the Neo Georgian style. * It has been little altered externally and internally and retains its plan form and many historic fixtures and fittings Letchworth Town Hall, by Robert Bennett and Wilson Bidwell, constructed in 1934-1935. Red brick laid in Flemish bond, with stone dressings and a plain tile-covered hipped roof. Rectangular plan with slightly projecting wings to the front and rear

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9	Letchworth Garden City War Memorial	Listed Building - Grade II	1413410	War Memorial	Modern	521734	232717	War Memorial, First and Second World Wars; unveiled 1921; designed by Onslow E Whiting; constructed of limestone.
10	The Free Church	Listed Building - Grade II	1102001	Free Church	Modern	522046	232542	1923 by B Parker. Classical style with Greek cross plan form. Welsh slate roofs. Brown brick with red brick dressings and wooden modillion cornice carried round the open pediments of the 4 arms of the building. Architraved sash windows with flat gauged brick arches, dressings and glazing bars. Main east front with 3-bay arcaded entrance approached by steps. This is the most important of the post WW I buildings in Letchworth. Represents a radical change in style and materials from the informal Arts and Crafts idiom to a more formal classicism.
11	Vasanta Hall	Listed Building - Grade II	1390556	Meeting Hall	Modern	521818	232382	Meeting Hall for Theosophical Society. 1914 by W.H. Cowlshaw (1869-1957) with planned extension executed 1922 by Crickmer and Foxley, and minor late-C20 alterations. Brown brick with concrete flat roofs. Single storey meeting hall with semi-circular entrance wing.
12	The Museum	Listed Building - Grade II	1102022	Museum	Modern	521699	232389	1914 and 1920 by Barry Parker. Major additions 1960-5 by C M Crickmer. Classical style building originally intended to be part of a larger block. Three storeys. Symmetrical facade with projecting entrance bays. Fenestration 1:1:3:1:1. Tiled roof with coped gables. Brick ridge stack. Brick front. Architraved sash windows with glazing bars. Windows of entrance bay in Portland stone vertical recesses, with cornices to first floor windows. First floor windows in arched recesses. Ground floor with entablature at first floor level. Architraved doorways with segmental open pediments.

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13	8-32, Meadow Way	Listed Building - Grade II	1174390	Cottages	Modern	521750	232217	1924-5 by C M Crickmer. Part of one of the most successful of the grouped developments in the Garden City using detached and semi-detached cottages with terraces to form a green on either side of Meadow Way. The cottages were designed for single business women who shared communal dining facilities located in the central block on the north side. One and a half and two storeys. Nos 12 to 28 (even) are symmetrically designed with 2 projecting central bays. Hipped tiled roofs with gabled dormers and red brick stacks. Roughcast walls. Casement windows with glazing bars.
14	3-21, Meadow Way	Listed Building - Grade II	1347698	Cottages	Modern	521780	232274	1916 by C M Crickmer. Part of one of the most successful of the grouped developments in the Garden City using detached and semi-detached cottages with terraces to form a green on either side of Meadow Way. The cottages were designed for single business women who shared communal dining facilities located in the central block. One and a half and two storeys. Nos 7 to 19 (odd) are symmetrically designed with projecting end and central bays. Hipped tiled roofs with gabled dormers and red brick stacks. Roughcast walls. Casement windows with glazing bars. Nos 7 to 19 (odd) have 4-light bay windows linked by canopy extending over paired entrances. Nos 3, 5 and 21 have entrances with canopies.
15	The Church of St Michael The Archangel, Letchworth	Non- Designated Heritage Asset	1485017	Church	Modern	521557	232220	A Certificate of Immunity was issued under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended, as the Secretary of State does not intend to list this building or these buildings to which the notice relates for the period set out below.

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16	Letchworth Railway Station	Non-Designated Heritage Asset	7181 - MHT7181	Building	Modern	521708	232750	1912 Great Northern station in Arts & Crafts style. The booking hall, public rooms, offices and footbridge are all listed structures, built in 1912 by the Great Northern Railway to replace a temporary station built in 1904. The style is Arts & Crafts, although the two-storey booking hall, with exposed timbers, is decorated in Art Nouveau style. Sources (1) Unpublished document: Wild, Sarah (HCC). 1994. Survey. (2) Bibliographic reference: Fitzpatrick-Matthews, Keith J, & Fitzpatrick-Matthews, Tony. 2009. The archaeology of Letchworth Garden City. Photo, p3 (3) Digital archive: Listed Buildings description. (4) Cartographic material: OS 25 inch map, 3rd edition (1913-1925). 1922
17	Broadway, Letchworth	Registered Park & Garden - Grade II	1000908 / 7319 - MHT7319	Park and Garden	Modern	521566	232074	Early C20 central town gardens and square approached by a formal tree-lined boulevard, forming the approach to the heart of the first garden city.
17	Palaeolithic And Neolithic Flint Implements, 31 Gernon Road, Letchworth	Non-Designated Heritage Asset	352 - MHT352	Find Spot	Prehistoric	521800	232400	Numerous flint implements from the garden of 31 Gernon Road (Letchworth Museum (Acc 377, 386, 400, 573, 1544, 1550, 1816)); listed in the Morris Gazetteer as Neolithic <1> though one of the flints (Acc 1550) is recorded by Letchworth as Palaeolithic. The latter flint was donated in September 1915 <2> Sources (1) Unpublished document: Morris Gazetteer. (2) Bibliographic reference: Letchworth Mus gazetteer

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18	Neolithic Worked Flints, 51 Gernon Road, Letchworth	Non-Designated Heritage Asset	353 - MHT353	Find Spot	Prehistoric	521990	232470	Neolithic worked flints found in the garden of 51 Gernon Road, Letchworth <1> . Letchworth Museum (Acc 8639). There is a spread of similar Neolithic worked flint around Gernon Road <2, 3> ; see also [352, 357, 2280, 2281]. Sources (1) Unpublished document: Morris Gazetteer. (2) Bibliographic reference: Fitzpatrick-Matthews, Keith J, & Fitzpatrick-Matthews, Tony. 2009. The archaeology of Letchworth Garden City. - p15 (3) Report: Fitzpatrick-Matthews, Keith. 2008. Howard Park and Howard Garden, Letchworth Garden City, Herts: archaeological desk based assessment. desk-based assessment. RNO 2348 p5
19	Flints, Icknield Way, Letchworth	Non-Designated Heritage Asset	1292 - MHT1292	Flints	Prehistoric	521400	232800	Flints (prehistoric period uncertain) found by G J Buller. Sources Index: Letchworth Museum Catalogue.
20	Palaeolithic Handaxe, 195 Nevells Road, Letchworth	Non-Designated Heritage Asset	16251 - MHT16251	Hand Axe	Prehistoric	521810	232870	Hand Axe. Found at the end of the rear garden at 195 Nevells Road, Letchworth. The implement is 'a pointed type, of dark grey flint, very good condition, with no trace of post-depositional damage'.
21	The Icknield Way	Non-Designated Heritage Asset	4182 - MHT4182	Monument	Prehistoric	521492	232907	TRACKWAY (? , Early Neolithic to Late Iron Age - 4500 BC to 49 AD) ROAD (Roman - 50 AD to 409 AD) Ancient route along the Chiltern ridge, at least partly updated in the Roman period and which still survives NE of Luton. HER coordinates: 525000, 234500

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22	Late Iron Age Or Romano-British Pottery, Letchworth	Non-Designated Heritage Asset	1268 - MHT1268	Roman Pottery	Late Iron Age / Roman	521870	232950	A quantity of broken Roman pottery was found in Nevells Road, Letchworth in 1927 <1> . 'Mr Moss Eccardt said the pottery is of poor quality and may well be late Iron Age' <2> . Letchworth Museum (Acc 4386, 4047). Sources (1) Article in serial: Westell, W Percival. 1926. Roman and pre-Roman antiquities in Letchworth Museum; Trans East Herts Archaeol Soc 7/3, 258-81. - p277 (2) Index: OS Records. (3) Index: Letchworth Museum Catalogue.
23	Romano-British Pottery, Grosvenor Road, Letchworth	Non-Designated Heritage Asset	1448 - MHT1448	Roman Pottery	Roman	521300	233000	Pottery, including Samian and Castor ware, the date range mid 2 nd to mid 4 th century . Sources Unpublished document: Morris Gazetteer
24	Roman Coin, Picture Palace, Eastcheap, Letchworth	Non-Designated Heritage Asset	1262 - MHT1262	Roman Coin	Roman	521778	232510	Coin of Vespasian, found in April 1922 <1> . The cinema is shown on the 1922 OS map <2> , on the east side of Eastcheap. The coin was presumably found during the cinema's construction, one of the early amenities for the new Garden City. Sources (1) Index: Letchworth Museum Catalogue. (2) Cartographic material: OS 25 inch map, 3rd edition (1913-1925). 1922
25	Possible Roman Annular Ornament, Meadow Way, Letchworth	Non-Designated Heritage Asset	1457 - MHT1457	Roman Annular Ornament	Roman	521800	232300	Annular ornament, possibly Roman, found at Meadow Way. Letchworth Museum (Acc 1554). Sources Unpublished document: Morris Gazetteer

26	Pagan Saxon Cemetery, The Quadrant, Letchworth Garden City	Non-Designated Heritage Asset	15642 - MHT15642	Saxon Cemetery	Medieval	521750	232970	Inhumations and cremations, with finds; and horse burials. 'During the early years of building the Garden City' a group of burials 'was found while digging sewers on The Quadrant, just south of the Icknield Way'; the site is close to the historic parish boundary. There were 'both skeletons in graves and cremations in urns; some of the burials were accompanied by ironwork and bronze objects. Several horses were buried in large pits in the same area, some with stirrups and other horse gear, but it is not clear that they were of the same date as the cemetery'. Sources (1) Bibliographic reference: Fitzpatrick-Matthews, Keith J, & Fitzpatrick-Matthews, Tony. 2009. The archaeology of Letchworth Garden City. - p26 (2) Unpublished document: Information from Keith Fitzpatrick-Matthews, North Hertfordshire Museum. E-mail, 12.10.2009 (3) Report: Fitzpatrick-Matthews, Keith. 2008. Howard Park and Howard Garden, Letchworth Garden City, Herts: archaeological desk based assessment. desk-based assessment. RNO 2348 Fig 7
27	Letchworth Museum, The Broadway, Letchworth	Non-Designated Heritage Asset	13508 - MHT13508	Museum	Modern	521699	232393	Part of the Garden City's civic layout around the Broadway, the Museum was built in 1914 and 1920 by Barry Parker. It is in classical style, and was originally intended to be part of a larger block. Major additions were finally made in 1960-65 by C M Crickmer. The building, in brick and Portland stone, has three storeys with a symmetrical façade, and projecting entrance bays.

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28	Railway Bridge, Spring Lane, Letchworth	Non-Designated Heritage Asset	5619 - MHT5619	Railway Bridge	Post-Medieval	521130	232490	Railway bridge with cattle arch. Brick with wing walls and parapet. Single arch height 9ft, width 10ft <1>. The road beneath has been pedestrianised and the bridge is in good condition <2> . Sources (1) Index: Branch Johnson, W. Survey of Industrial Monuments in Herts. Record 3570 (1966) (2) Unpublished document: Wild, Sarah (HCC). 1994. Survey. 20.1.1994
29	45-49 Station Road, Letchworth, Garden City	Non-Designated Heritage Asset	13684 - MHT13684	Apartment and Shop	Modern	521900	232772	Apartment and Shop. A two-storey range designed by Barry Parker and Raymond Unwin for the First Garden City during the first phase of construction in 1906-1910. The whole block retains a distinct Arts & Crafts appearance
30	Bennett's Motor Works, 27 The Wynd, Letchworth Garden City	Non-Designated Heritage Asset	13685 - MHT13685	Garage and Workshop	Modern	521972	232751	Garage and Workshop, 1910. A single-storey brick building with a steep pitched tiled roof, this was built c.1910 as Bennett's Motor Works, serving the new Garden City, and is relatively unchanged.
31	217 Icknield Way, Letchworth Garden City	Non-Designated Heritage Asset	15687 - MHT15687	Detached House	Modern	521730	233015	Detached House. Winner of First Prize in the 1905 Cheap Cottages exhibition. It was designed in 1905 for the exhibition by Percy Houfton.
33	Fenner's Building, Openshaw Way, Letchworth Garden City	Non-Designated Heritage Asset	13686 - MHT13686	Factory	Modern	521930	232716	Factory. A striking two-storey building, rendered and painted white, with attic and pitched tile roof; along the side facing Openshaw Way is FENNER'S BUILDING in large attached letters. Currently divided into small units, it has been altered, but is an early Garden City industrial building, dating before 1925, and may retain original features.

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34	WWII Air Raid Shelters, Kennedy Gardens, Letchworth Garden City	Non-Designated Heritage Asset	12630 - MHT12630	WW2 Air Raid Shelters	Modern	521630	232310	Three air raid shelters found in the Kennedy Gardens in the centre of Letchworth during landscaping works were of Stanton type, of pre-cast concrete segments. They were uniform in design and size, with electric lighting. Their exact date is not known. They have been filled with foamed concrete after recording. Sources (1) Report: Semmelmann, Karin. 2003. Kennedy Gardens, Letchworth Garden City, Herts: historic building record. building recording. RNO 1430 (2) Bibliographic reference: Stanton Ironworks Co Ltd. c.1940. Stanton tubular reinforced concrete air-raid shelters.
35	21 & 8-32 Meadow Way, Letchworth, Garden City	Non-Designated Heritage Asset	13510 - MHT13510	Cottages	Modern	521765	232245	1916 and 1923 cottages by Crickmer, grouped around a green; designed for single business women with communal dining facilities.
37	Norton Common, Letchworth Garden City	Non-Designated Heritage Asset	15707 - MHT15707	Landscape	Unknown	521790	233310	COMMON LAND of unknown date. Norton Common is no longer common land; in 1904 it was incorporated by Barry Parker and Raymond Unwin into their master plan for the first Garden City as the major public open space. Unwin designed an avenue of trees (planted 1919-20) across it, with a path, as a formal landscape feature when the SE part of the common began to be redeveloped as a recreation ground. Other parts remain wild, crossed by the Pix Brook.
38	Historic Buildings Impact Assessment For The Town Centre, Letchworth	Event	EHT1127	Building Recording	N/A	521970	232720	Assessment of every building in two areas at the north end of Letchworth town centre, The Wynd and The Arena, in advance of proposed demolition and redevelopment. Carried out by Heritage Network.

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	Garden City, 2007							
39	Evaluation At Broadwater Dale Garages, Letchworth, 2010	Event	EHT1597	Intervention - Trial Trench	N/A	521340	232250	Three long trial trenches on the footprints of new housing revealed only modern land drains and some hydrocarbon contamination from the garages. There were no archaeological finds, features or deposits. Carried out by Heritage Network.
40	Building Recording At Land Off Gernon Road Letchworth Garden City, 2021	Event	EHT8889	Building Recording	N/A	521775	232405	Carried out by Oxford Archaeology East.
41	Building Recording At Kennedy Gardens, Letchworth Garden City, 2003	Event	EHT5328	Building Recording	N/A	521635	232315	Carried out by Heritage Network.
42	Annemuir	Listed Building - Grade II	1102005	Cottage	Modern	521777	232997	1905 by Lionel F Crane. One of the best 1905 Cheap Cottages. One and a half storeys. One window. Simple timber-framed building clad in weather-boarding and incorporating jettied ends. Tiled roof. Brick ridge stack.
43	221, Icknield Way	Listed Building - Grade II	1101991	Cottage	Modern	521794	233040	1905 by Bennett and Bidwell. Cottage in the vernacular style. Awarded second prize in Class I of the 1905 Cheap Cottages Exhibition. One and a half storeys. Three windows gabled front. Tiled roof with brick stack. Weather-boarded brick walls.

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44	Neolithic Implements, Museum Garden, Letchworth	Non-Designated Heritage Asset	357 - MHT357	Flint Sinker	Prehistoric	521700	232300	Flint sinker, Letchworth Museum (Acc 6055); hammerstone, Letchworth Museum (Acc 99); flint scraper, Letchworth Museum (Acc 1538) and two flints, Letchworth Museum (Acc 50). Sources (1) Unpublished document: Morris Gazetteer
45	Great Northern Railway: Cambridge Branch	Non-Designated Heritage Asset	N/A	Railway	Post-medieval	521522	232703	Great Northern Railway: Cambridge Branch. Mapped on Ordnance Survey Old Series mapping published in 1834.

Appendix 2. Assessment Scope and Criteria

Scope of the Assessment

This report details the results of a Heritage Impact Assessment and aims to identify and map the nature of the heritage resource within the site and surrounding study area. Where possible, the assessment will evaluate the likely impact from Proposed Development, upon the known and potential heritage resource. This report will include recommendations for mitigation measures and / or further archaeological works; where the archaeological potential of the site warrants, or where additional information on the site is required.

Further works could include additional research, monitoring of geotechnical investigations, programmes of archaeological surveying and / or field evaluation. The results of any further studies can be used to inform the nature of any subsequent mitigation measures (if required) and provide advice upon the scope and design of the Proposed Development.

The assessment has used the sources listed in the main text to identify and map heritage assets and other relevant find spots or evidence within the site and defined study area. Heritage assets are defined in national planning guidance and can include designated assets (Scheduled Monuments, Listed Buildings etc.), standing, buried or submerged remains, historic buildings and structures, parks and gardens and areas, sites and landscapes - whether designated or not.

Assessment Criteria

Consideration of archaeological potential will be informed by the number, density and distribution of known heritage assets of a specific period and/or type within the Study Area. The proximity of such assets to the Site and/or the similarities/dissimilarities in topographical location between the Site and the location of known assets will also be a factor in determining potential. Previous land use on the Site will also be a consideration in assessing potential, as later disturbance may have removed or damaged earlier buried archaeological remains and therefore may have reduced the potential for archaeological remains to survive on Site. Consideration will also be given to evidence from landform change in the study area and the possibility that natural deposits such as colluvium or alluvium may have buried archaeological remains. The potential for surviving archaeological evidence of past activity within the Site is expressed in the report as ranging between the scales of:

- High – The available evidence suggests a high likelihood for past activity within the site and a strong potential for archaeological evidence to survive intact or reasonably intact;
- Medium – The available evidence suggests a reasonable likelihood for past activity within the site and consequently there is a potential that archaeological evidence could survive.
- Low – The available evidence suggests archaeological evidence of activity is unlikely to survive within the site, although some minor land-use may have occurred.

- Uncertain - Insufficient information to assess.

Buried archaeological evidence is, by its very nature, an unknown quantity which can never be 100% identified during a desk-based assessment. The assessed potential is based on available evidence but the physical nature and extent of any archaeological resource surviving within the site cannot be confirmed without detailed information on the below ground deposits or results of on-site fieldwork.

Where known heritage assets are identified, the importance of such assets is determined by reference to existing designations where available. For assets where no designation has been assigned, an informed assessment has been made of the likely historic, artistic, or archaeological importance of that resource based on professional knowledge and judgement.

Adjustments to the classification (Table 3, below) are occasionally made, where appropriate; for some types of finds or assets where there is no consistent value, and the importance may vary. Levels of importance for any such areas are generally assigned on an individual basis, based on professional judgement and advice.

Table 2: Assessing the Importance of a Heritage Assets

LEVEL OF IMPORTANCE	DEFINITION
VERY HIGH	World Heritage Sites and other designated or non-designated assets with demonstrable Outstanding Universal Value.
HIGH	Assets of high importance and rarity and those considered to be important at a national level., e.g. Scheduled Monuments (or non-designated assets of schedulable quality and importance), Grade I and II* Listed Buildings, Grade I and II* Registered Parks and Garden and Registered Battlefields. Well preserved historic landscapes, whether inscribed or not, with exceptional coherence, time depth, or other critical factor(s)
MEDIUM	Assets of medium importance and rarity and those considered to be important at a regional level. Designated or non-designated assets including Grade II Listed Buildings and Conservation Areas; well preserved structures or buildings of historical significance, historic landscapes or assets of a reasonably defined extent and significance, or reasonable evidence of occupation / settlement, ritual, industrial activity etc. Examples may include burial sites, deserted medieval villages, Roman roads and dense scatters of finds.
LOW	Assets of low importance and rarity and those considered to be important at a local level. Locally listed buildings or non-designated assets with some evidence of human activity which have the potential to contribute to local research objectives, structures or buildings of potential historical merit. Examples include assets such as historic field systems and boundaries, agricultural features such as ridge and furrow, etc.
NEGLIGIBLE	Assets of very low importance which are common. Heritage assets with very little or no surviving archaeological interest or buildings and landscapes of no historical significance. Examples include destroyed antiquities, buildings of no architectural merit, or relatively modern landscape features such as quarries, field boundaries, drains and ponds etc.

LEVEL OF IMPORTANCE	DEFINITION
UNKNOWN	Insufficient information exists to assess the importance of a feature (e.g. unidentified features on aerial photographs).

The likely magnitude of the impact of the Proposed Development works is determined by identifying the level of change from the Proposed Development upon the ‘baseline’ conditions of the Site and the heritage resource identified in the assessment. This effect can be either adverse (negative), beneficial (positive) or neutral. The criteria for assessing the magnitude of impact are set out in Table 4 below.

In certain cases, it is not possible to confirm the magnitude of impact upon a heritage resource, especially where anticipated buried deposits exist. In such circumstances a professional judgement as to the scale of such impacts is applied.

Table 3: Criteria for Determining Magnitude of Impact

LEVEL OF MAGNITUDE	DEFINITION
ADVERSE	
HIGH	Considerable impacts fundamentally changing the baseline condition of the receptor, leading to total or considerable alteration of the asset or its setting – e.g. complete or almost complete destruction of the archaeological resource; dramatic visual intrusion into the setting of the asset resulting in considerable adverse change; significant increase in noise or changes in sound quality; extensive changes to use. Considerable impacts to or loss of designated heritage assets of the highest significance, notably Scheduled Monuments, Protected Wreck Sites, Registered Battlefields, Listed Buildings, Registered Parks and Gardens, and World Heritage Sites.
MEDIUM	Impacts changing the baseline condition of the receptor materially but not entirely, leading to partial alteration of the asset or its setting – e.g. a large proportion of the archaeological resource damaged or destroyed; visual intrusion into key aspects of the setting of the asset; and changes in noise levels or use of an asset that would result in detrimental changes to character.
LOW	Detectable impacts which alter the baseline condition of the receptor to a small degree – e.g. a small proportion of the surviving archaeological resource is damaged or destroyed; minor severance, change to the setting or structure or increase in noise; and limited encroachment into character of a historic landscape.
NEGLIGIBLE	Barely distinguishable adverse change from baseline conditions, where there would be very little appreciable impact on a known asset, possibly because of distance from the development, method of construction or landscape or ecological planting, which are thought to have no long-term effect on the significance of the asset.
NEUTRAL	
NEUTRAL	A change to the asset or its setting which does not result in harm or benefit. This may occur where there is a perceptible change, but that change does not diminish or enhance the significance of the asset or the ability to appreciate its significance.

LEVEL OF MAGNITUDE	DEFINITION
BENEFICIAL	
NEGLIGIBLE	Barely distinguishable beneficial change from baseline conditions, where there would be very little appreciable impact on a known asset and little long-term effect on the significance of the asset.
LOW	Minimal enhancement to an asset or its setting, such as removal of minor inappropriate features, limited improvements to setting or reduction in severance; slight changes in noise or sound quality; minor changes to use; resulting in a small improvement which would lead to enhancement of the ability to appreciate the significance of an asset.
MEDIUM	Changes to key to an asset or its setting resulting in material enhancements which allow for greater appreciation of the asset and/or its setting. For example, removal of an inappropriate later addition allowing for the assets significance to be reveal; removal of an inappropriate feature in an asset's setting allowing the contribution of setting to the assets significance to be better understood or substantial reductions in noise or disturbance such that the significance of known asset would be enhanced.
HIGH	Substantial positive changes to an asset and key elements of its setting which would greatly enhance its significance and the ability to appreciate that significance; this might result from the removal of adverse or considerably distracting features from the setting of an asset; significant decrease in noise or changes in sound quality; changes to use or access.

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