



Historic England

Mr Justin Booij
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Our ref: P01599842

10 November 2025

Dear Mr Booij

**T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**BA1(LAND EAST OF NORTH RD AND NORTH OF RAILWAY LINE); BA10(LAND
BETWEEN RAILWAY LINE AND ROYSTON RD); BA3 (LAND WEST OF A505);
BA2 (LAND SOUTH OF CLOTHALL RD); WALLS FIELD; URBAN OPEN LAND
WEST OF A505, AND LAND WEST OF NORTH RD, BALDOCK
Application No. 25/02571/OP**

Thank you for your letter of 22 October 2025 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

Summary

We see many positive aspects to the proposals but recommend that the Historic Environment Management Plan that is cited in the application be provided with the application. This is in order to outline how important assets would be managed, and how the town's rich heritage will be celebrated and appropriately conveyed to residents and visitors in a consented scheme.

This would provide evidence that both the Growing Baldock Masterplan's heritage vision and NPPF policy are being addressed.

Historic England Advice

Significance

The proposals lie close to a number of designated heritage assets and in a landscape of important undesignated archaeology dating from later prehistory onwards.

Baldock's well preserved archaeological remains include many that illustrate the nationally important transition from iron age tribal population centre to Roman town and part of empire. Parts of the Roman settlement are designated as Scheduled Monuments (NHLE 101635 and 1003548) and are part of, or adjacent to, the



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proposals. Baldock's Conservation Area preserves the mediaeval layout of the planned town that was founded in the twelfth century alongside or over the abandoned Roman settlement. A number of listed buildings stand close by.

Archaeological fieldwork from the 1970s to the present day, including investigations to inform this application, has improved our understanding of the town's early past.

The settings of the scheduled monuments contribute to their significance, preserving elements of the early town's relationship with its agricultural hinterland, the river Ivel and the historically important course of Ermine Street linking Roman London with Lincoln and York. These assets are currently predominantly managed as open spaces, but parts are under threat from ploughing and development creep, while the public presentation and interpretation of the assets could be improved.

The Roman town scheduled monument (NHLE 101635) is on Historic England's Heritage at Risk (HAR) register, because of the continued risk from arable ploughing impacts on buried remains.

Impact

The outline scheme would substantially extend the urban boundaries of Baldock northwards and south eastwards. I welcome that open space and landscaping efforts have been made to reduce the impact of this extension on the settings of the Roman scheduled monuments, often sustaining their existing relationships with the surrounding countryside, Ermine Street and the river valley.

Some impact on that relationship would appear to be created on the South of Blackhorse Farm Roman settlement site (NHLE 1003548) by reason of placing new built development to its east. I am not able to agree with the Heritage ES in its statement (8.5.10) that no significant harm will be created to the setting of this asset, given the current outline nature of the proposals and the proximity of proposed development zones to the asset of up to three storeys.

Some unspecified and limited changes appear to be being considered within the Scheduled Monuments around their interpretation and amenity. Any works would require statutory Scheduled Monument Consent and should be discussed and agreed with Historic England as part of a wider heritage strategy.

The proposals would end ploughing impacts at the Roman town monument (NHLE 101635) which, alongside appropriate future management, would result in the site likely being removed from the HAR register.

Several areas of significant undesigned archaeology have been identified at the application site. Some, such as the bronze age barrow cemetery at site VII and the



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iron age-Romano-British occupation site VIII, preserve extensive and complex remains. Others appear to preserve significant roadside activity along the line of Ermine Street. Many of these sites are proposed for development. The ES (9.6.2) proposes that these are subject to advance archaeological investigation and recording. I recommend that the advice of the County Archaeologist be sought over the policy case for preservation of any of these sites and the scope and detail of excavation work.

The applicants describe an Historic Environment Management Plan in the October 2025 Development Specification by David Lock Associates accompanying the outline planning application. However, this is not included with the material online and is only mentioned in the ES as an unspecified aspiration (9.5.23).

Although possible preservation of significant sites within the development footprint is mentioned in the ES (9.6.7) there appears to have been no exercise in selecting these, or exploration of methodologies and no binding measures are proposed to provide preservation in a detailed scheme.

Although the current application provides useful information on the extent and likely significance of the known heritage assets affected, I am disappointed that current proposals to reduce and offset harm from the scheme are limited to agreed excavation and (possible) signage boards. I do not consider that this meets NPPF 219 which emphasises that LPAs should seek schemes that enhance or better reveal the significance of affected assets. I am disappointed that the Growing Baldock Masterplan's heritage aims and objectives do not appear to have followed through clearly to the application.

The Historic Environment Management Plan cited in the application would be extremely helpful in meeting NPPF 219 and in responding to the Masterplan. It could helpfully provide an overall picture of how settings harms will be managed, how preservation in situ would be agreed and managed post-consent, and importantly how the future interpretation, presentation and management of the site's heritage would be achieved.

In the absence of this document, I am concerned that the proposals do not capitalise on Baldock's extremely rich heritage and risk unmanaged harm to it both during development and afterwards. Without a long-term management plan for the Roman town especially, it may not be possible to remove it from the HAR register.

Policy

The 2013 DCMS policy position on Scheduled Monuments states that the significance of ancient monuments derives not only from their physical presence, but also from their setting.



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NPPF 207 says local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting

NPPF 208 requires that Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.

NPPF 212 places great weight on the conservation of an asset's conservation when considering proposed development's impact on it, irrespective of the level of harm. It goes on to say that any harm or loss of significance requires clear and convincing justification (para 213).

Proposals that create substantial harm should be refused unless that harm is necessary to secure substantial public benefits that outweigh that harm (NPPF 214) while impacts from less-than substantial harm should be weighed against public benefits (NPPF 215).

Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) proportionate to their importance and the impact and make this evidence publicly accessible (NPPF 218).

NPPF 219 encourages that local planning authorities look for opportunities for new development within the setting of heritage assets, to enhance or better reveal their significance.

The 2025 Growing Baldock Masterplan includes reflecting the "rich history and heritage" of Baldock in its Vision. Ideas in the document include the creation of heritage trails, new community assets, public realm and community events and activities.

Position

I recommend that the Historic Environment Management Plan mentioned in the application be provided for comment at this stage, to inform your decision. Agreement of this document would also provide confirmation that the heritage aspirations of the Growing Baldock Masterplan are being met.

Recommendation

Historic England has concerns regarding the application on heritage grounds. We consider that the issues and safeguards outlined in our advice need to be addressed in order for the application to meet the requirements of paragraphs 212,



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218 and 219 the NPPF.

In determining this application you should bear in mind the statutory duty of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess and section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.

Yours sincerely

Adam Single

Inspector of Ancient Monuments

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cc: Daniel Phillips, HCC



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