

CONSERVATION TEAM CONSULTATION APPLICATION RESPONSE

APPLICATION REF:	25/02571/OP
CASE OFFICER:	JB
APPLICATION SITE:	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.
DESCRIPTION OF WORKS:	Outline Application : Growing Baldock Development Site: Outline planning application with all matters reserved except for means of highway access into the development from the A505/Royston Road, North Road and Clothall Road for: up to 3,200 homes, up to 16ha of employment, waste and leisure infrastructure, a mixed use local centre, up to 1 secondary school, up to 2 x primary schools, up to 1 SEND school, health hub, green infrastructure (including parks, formal sports provision, play, habitat areas, informal open space and structural planting), internal street network, access junctions and railway crossing, public transport infrastructure, pedestrian/cycle network (including PRoW diversions, active travel routes, mobility hubs and crossing of the railway), utilities and drainage infrastructure including diversions of existing and provision of new infrastructure, pumping stations, sustainable drainage, primary substations, rising main/strategic sewer and renewable energy infrastructure), ground remodelling/earthworks and any necessary demolitions (as amended by plans and documents received 26.02.2026)
RECOMMENDATION: Under ref: 24/00920/SCOP I took the view that the conservation area is some distance to the south-west, is surrounded by modern settlement and commercial premises (Appendix 2 Page 26, HIA submitted with that application) and that topographically there is no clear intervisibility between the site and the conservation area (other than the church spire), and agreed that the potential effects of the proposals will not be dependent upon screening subject to seasonal or diurnal change. I noted that it is stated that the proposals will not alter the skyline or silhouette. Next, I note that the nearest listed building (The Compasses) is about 50m away (Appendix 2 Page 29, HIA) whilst the application site is also c. 600m from the church at its closest point (Appendix 2 Page 31, HIA). With respect to the setting of Blackhorse Farmhouse, The Nook, Long Bailey, and The Compasses I note that there is no built form proposed within the immediate vicinity of any of the listed buildings (an intervening greenspace buffer is indicated on the masterplan). Furthermore, I note the assessment for the two Scheduled Monuments: i) Romano-British small town and Late Iron Age settlement off Clothall Road and ii) Settlement site south of Blackhorse Farm, and the fact that the masterplan includes sufficient greenspace adjacent	

to the scheduled monuments to ensure that there will be a limited tangible increase in built form within their immediate vicinity.

I noted at 5.13 of the HIA that *'The Strategic Masterplan will take into consideration the wider visibility of the church spire, and there is the potential for some improvement of views towards it and greater accessibility of these views (which are currently from private/inaccessible agricultural land)'*. Evidence as to how some improvement of views towards the church spire is made possible will be required in due course.

At the SCOP stage and indeed now, I have not seen any evidence or have separately come to the view that there would be any direct adverse impact upon, or harm identified to the significance of known designated heritage assets.

In my opinion whilst there will a significant impact upon the wider setting of the Baldock Conservation Area and the setting of several other Designated Heritage Assets, the proposal satisfies the provisions of Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the aims of Section 16 of the NPPF and Policy HE1 of the North Hertfordshire Local Plan 2011-2031.

SITE CONTEXT:

As stated at 1.3.1 of the **Historic Environment Management Plan February 2026 - Issue No.1:**

The Site covers seven land parcels within c. 220ha that were defined within the North Hertfordshire Local Plan (North Herts Council 2022; Fig. 2). These are predominantly agricultural land on the northern and eastern edges of the town of Baldock, c. 50km to the north of London and c. 21.5km to the south-east of Bedford.

Although I was consulted on this application on 22 October 2025, I did not respond by the end of the consultation period on 14 November 2025. However, on 25 June 2024 I commented under ref: 24/00920/SCOP for up to 3,000 homes; up to 19 hectares of employment land; strategic 'green infrastructure'; a mixed-use local centre; education provision; and associated infrastructure. The current application includes the following document ***Growing Baldock Environmental Statement Volume 1: Text – Chapter 8: Built Heritage*** and which sets out the Current Baseline under 8.4.

8.4.1 There are no designated heritage assets within the areas of the Site proposed for development, however there is one scheduled monument which falls partially within the red line boundary, and there are a number of listed buildings, scheduled monuments and a conservation area within close proximity of the site boundaries. No non-designated heritage assets have been identified by the Local Planning Authority during pre-application consultations or during the course of this Heritage Impact Assessment.

8.4.2 The Proposed Development has the potential to affect the setting of a number of designated heritage assets and consequently their significance, and they are therefore the subject of the HIA (Appendix 8.1) and are considered further below.

8.4.3 The heritage assets identified as being potentially susceptible to impacts and therefore addressed further comprise:

- *The Baldock conservation area;*
- *Two scheduled monuments: The Romano-British small town and Late Iron Age settlement off Clothall Road and the Settlement site south of Blackhorse Farm;*
- *Four Grade II listed dwellings along North Road (The Nook, Long Bailey, Blackhorse Farmhouse and The Compasses);*
- *The Grade I Church of St Mary, Baldock.*

DETAILED ANALYSIS AND CONSIDERATIONS:

I concur with 8.4.8 of the submitted GBES – Built Heritage that ‘outward views from within the conservation area are prevented by the local topography, as well as the intervening built form which surrounds the historic core’. Under 8.4.9, I concur that the application site ‘forms part of the open landscape setting which physically surrounds the settlement of Baldock (and contained within that is the conservation area), however it is not appreciable from within it. The settlement of Baldock is visible from the application site to the north, however the distinctive character and appearance of the area is not appreciable from this distance, and with the exception of the Church of St Mary, none of the individual historic buildings are discernible’.

It is noted under 8.4.11 that:

There are two scheduled monuments one which is partially located within the Site and another which is within close proximity of the Site. Both of which adjoin the existing settlement of Baldock. These comprise the Romano-British small town and Late Iron Age settlement off Clothall Road and the Settlement site south of Blackhorse Farm. Both scheduled monuments are currently experienced as areas of open greenspace on the edges of Baldock but are not visually tangible historic features (i.e. there is no visible built form or clear earthworks which give them prominence).

I understand that the masterplan has been designed to include sufficient green space to mitigate the effect of the development along North Road.

I concur with the view that none of the listed building DHAs are considered particularly susceptible to the level of change posed and “the masterplan has further mitigated this potential negligible effect on setting through the inclusion of a very substantial area of green space (Bygrave Common) (including landscaping, parkland and open space) which would intervene between these assets and the new residential areas” (8.4.19).

8.5.16 The Proposed Development will take into consideration the wider visibility of the church spire, and there is the potential for some improvement of views towards it and greater accessibility of these views (which are currently from private/ inaccessible agricultural land). Strategic views from the development to Baldock, particularly to St Mary’s church, to be reinforced by planting, alignment of streets and routes and parcel and block layout along view corridor (as per Design Principles).



I am aware of Adam Single’s comments (Historic England) dated 10 November 2025 raising concerns regarding the application on heritage grounds including:

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).

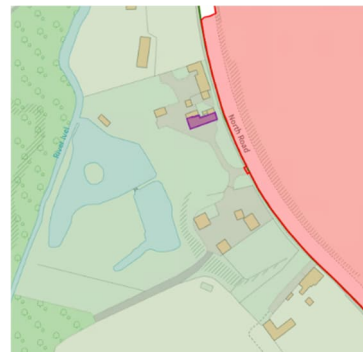
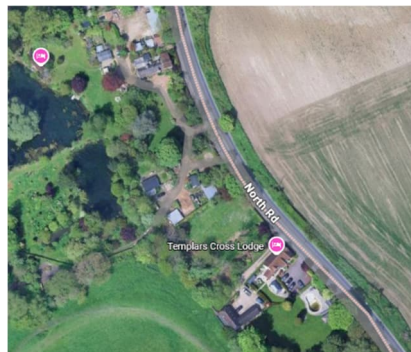
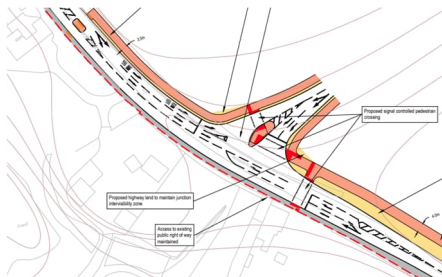
Although possible preservation of significant sites within the development footprint is mentioned in the ES (9.6.7) there appears to have been no exercise in selecting these, or exploration of methodologies and no binding measures are proposed to provide preservation in a detailed scheme.

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.

Whilst I generally agree that the setting of currently identified Designated Heritage Assets is unlikely to be significantly affected by the proposed development, the 'narrative' of arriving at Baldock from the northeast via Bygrave Road will significantly and irrevocably change. The development will impact upon the perception of Baldock being seen as a modest-sized North Hertfordshire town. This experience from this approach would see a substantial urban extension not too dissimilar in size to that experienced at Biggleswade to the north (the Kings Reach development). When approaching from the north long North Road the main entrance into the site as depicted in the left-hand image below lies beyond The Compasses (grade II) whilst in front in the image below right is Templars Cross (formerly grade II listed on 15 August 1974 but delisted on 19 October 2012). This engineered highway proposal will not have such a harmful impact upon the setting of heritage assets to merit an objection on heritage grounds.



Having considered the Summary of Effects at 8.7.4 and 8.7.5, whilst I acknowledge the view in the GBES – Built Heritage that “*within the settings of these assets the carefully developed proposals have effectively mitigated any adverse effects through design and layout, and no harm would therefore be posed to the significance of the designated*

heritage assets”, can this actually be relied upon at this stage without assessing fully detailed proposals.

I have noted Andy Instone’s response dated 12 November 2025 (*Senior Historic Environment Advisor, Hertfordshire LEADS - Environmental Sustainability Hertfordshire LEADS provides Landscape, Ecology, Archaeology, Design and Sustainability support to planning departments in Hertfordshire*). I have also read Historic England’s responses dated 10 November and 26 March 2026 and I concur with the summary in their first response (see extracts below):

..... 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.....

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.

As was the case with Historic England, NHC’s Conservation Team was consulted on 18 March 2026. In an email to the Conservation Team on 25 March 2026, the case officer says that “*there have been helpful discussions regarding archaeology with HCC Archaeology and Historic England*”. I note particularly the new **HEMP** document and the **Environmental Statement Addendum Volume 1: Text Chapter 8: Built Heritage**.

I note the following in HE’s second response from 26 March.

We welcome submission of the new HEMP document and I confirm withdrawal of my November 2025 concerns as a result.

We suggest that you seek the views of your specialist conservation and archaeological advisers, as relevant.

It is not necessary for us to be consulted on this application again, unless there are material changes to the proposals. However, if you would like detailed advice from us, please contact us to explain your request.

It is noted that at this outline stage, the HEMP is an iterative document that will be reviewed and updated throughout the life of the project. I further note the following at 2.1.2 of the HEMP.

As the development is currently at the outline planning stage, definitive designs have not yet been produced. As such, this is an iterative document that provides details of where archaeology will influence the detailed design of the development. This document will:

- a) Highlight current management issues;*
- b) Detail iterative strategies for the protection and enhancement of the archaeological heritage assets, particularly the Scheduled Monument in Walls Field, in order to ensure their continued significance;*

- c) Detail a commitment to an iterative design approach for all stages of the project, with archaeological data and future mitigation results feeding into the design for the development, such as for: land use, built form, green space, street layout and SuDs design;
- d) Outline opportunities for community engagement and the enhancement of public knowledge of the site and its significance; and
- e) Outline future management procedures and how the HEMP will be implemented and reviewed.

Considering the purpose of the HEMP and that this principally falls outside of my expertise and qualification to comment, I do not intend offering further comment in this response and leave this matter with County's Senior Historic Environment Advisor to address.

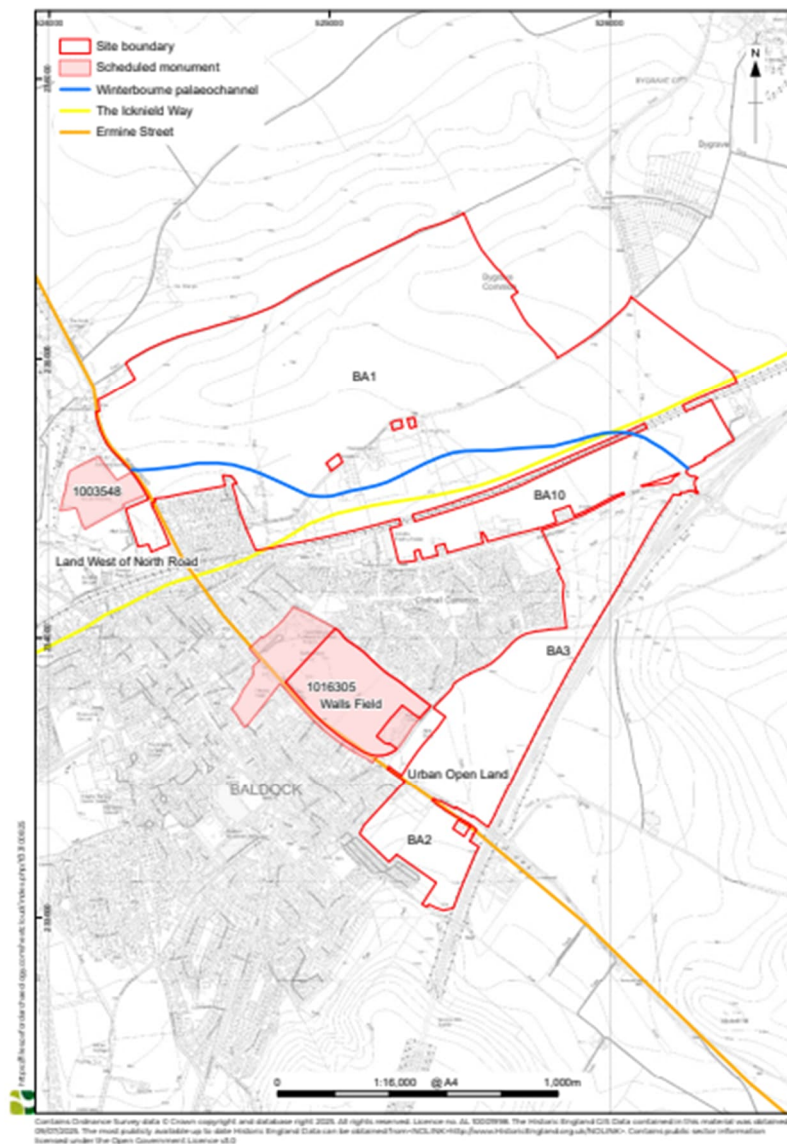


Figure 2: Site layout with affected Scheduled Monuments

HERITAGE POLICY ASSESSMENT:

Planning (Listed Building and Conservation Areas) Act 1990:

Section 66(1) (NB: No part of application site lies within the Baldock Conservation Area, so Section 72(1) does not directly apply)

North Hertfordshire Local Plan 2011-2031:

Policy HE1

NPPF (December 2024):

The following paragraphs are relevant:

- **135 c)** *(sympathetic to local character and history, including the surrounding built environment),*
- **207** *(local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting)*
- **210** *(desirability of new development making a positive contribution to local character and distinctiveness),*
- **212** *(great weight should be given to the asset's conservation),*
- **213** *(clear and convincing justification), and*
- **215** *(harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use).*
- **218** *(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).*
- **219** *(opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably).*

CONCLUSION:

I find the current proposal **UNOBJECTIONABLE.**

OFFICER: Mark Simmons

DATE: 08/05/2026