



JOHN MOORE HERITAGE SERVICES

HERITAGE ASSESSMENT

ON

PROPOSED PETROL FILLING STATION,

WHITEHORSE SERVICE STATION,

CLOTHALL ROAD, BALDOCK

SG7 6PD

AUGUST 2025

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REPORT ISSUED 19th August 2025

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Summary

John Moore Heritage Services was commissioned to undertake a heritage assessment on proposed redevelopment of a service station at Clothall Road, Baldock, Hertfordshire.

The proposal site is located next to the Romano-British small town and Late Iron Age settlement at Baldock Scheduled Monument. As a Scheduled Monument the settlement is recognised as being of national importance, largely due to its archaeological interest.

Heritage assets may be affected by direct physical change or by change to their setting, both of which could affect their significance. The Scheduled Monument will not be physically impacted by the proposals, however the proposed redevelopment is located within the setting of the monument. The most significant elements of the monument's setting are the landscape setting of the monument and its relationship to nearby Iron Age and Romano-British sites: this includes parts of the Iron Age and Romano-British settlement located within Baldock outside the scheduled area and also the sites and monuments within the wider landscape,

Though in close proximity, the extent to which the proposal site contributes to the setting of the Scheduled Monument is limited by its size and character: it forms a small part of the wider suburban environment that surrounds the monument. More significantly perhaps, it may contain archaeological remains that are contemporary with the monument.

Any archaeological remains within the proposal site may not provide a notable contribution to the overall significance of the monument, however a small degree of harm would arise as a result of their loss. In this regard a programme of archaeological investigation is recommended in order to mitigate against any harm. The proposed redevelopment may also result in a slight increase in artificial light to the area; this will be experienced within the existing suburban setting of the monument and is therefore unlikely to alter its setting to any meaningful extent.

The level of harm to the significance of the Romano-British small town and Late Iron Age settlement at Baldock is therefore anticipated to be Negligible.

1 INTRODUCTION

1.1 *Origins of the Report*

The purpose of the report is to provide an appraisal of the potential impact to the *Romano-British small town and Late Iron Age settlement at Baldock* Scheduled Monument as a result of proposed redevelopment at Whitehorse Service Station on Clothall Road, Baldock. This report was commissioned by AJ Planning and Development on behalf of JP & S Services Limited.

The proposal site is situated adjacent to the *Romano-British small town and Late Iron Age settlement at Baldock* Scheduled Monument (List Entry Number: 1016305) and is situated within the Clothall Common archaeological interest area. 53 South Road, located to the east, is a building of local importance and therefore considered a non-designated heritage asset.

1.2 *Location and Description*

The proposal site is situated across approximately 0.16ha of land at the junction of Clothall Road (A507) and South Road, to the east of the town centre in a largely residential area. The site is located within the North Hertfordshire District of Hertfordshire (Figure 1).

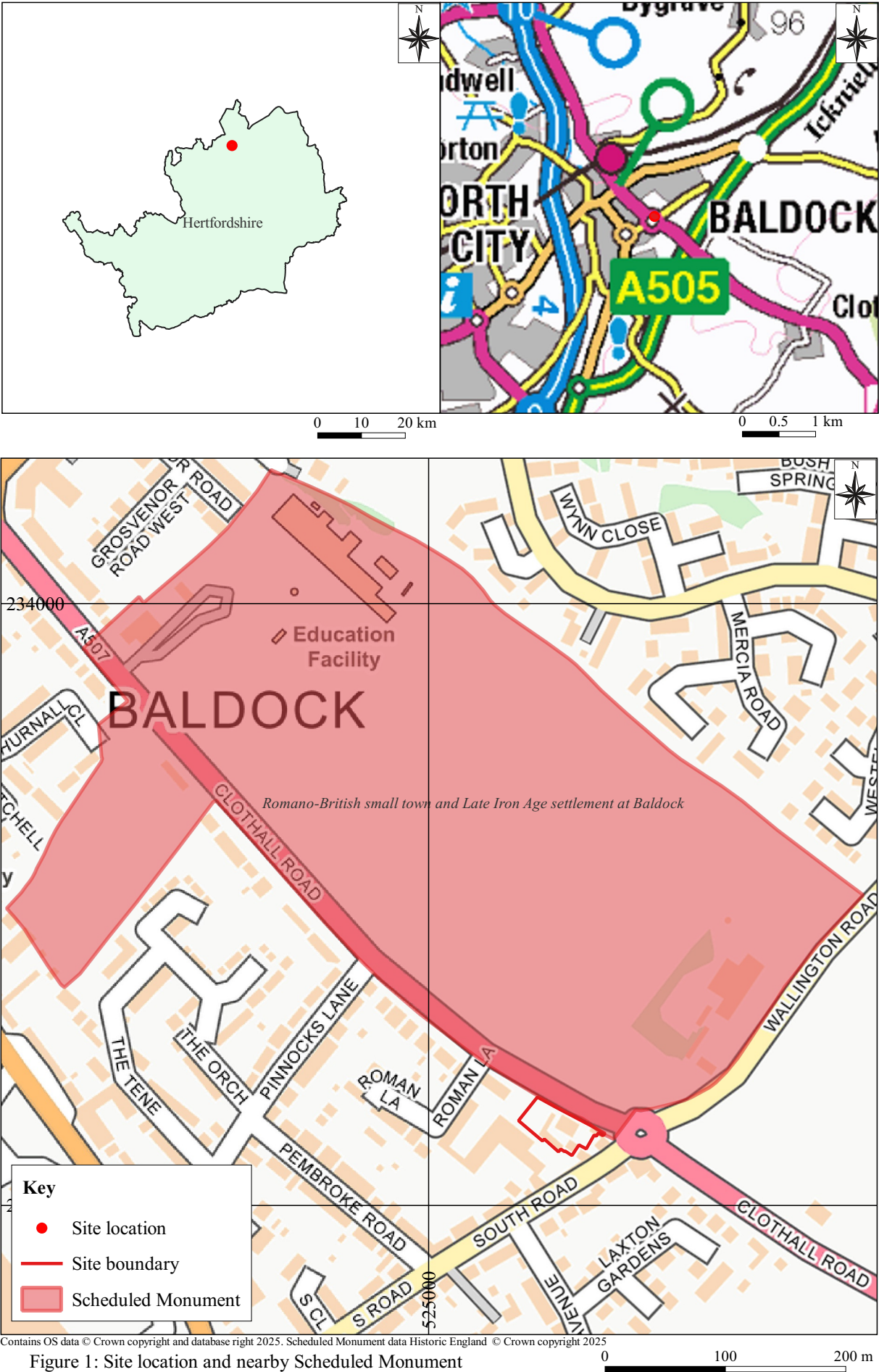
The site contains a number of buildings pertaining to its current and former uses, comprising an abandoned filling station, vehicle repair garage and an outbuilding to an adjacent property. The proposal site is bounded to the north by the route of the A507, to the east by 53 South Road, to the south by the Hen & Chickens public house and to the west by light industrial units.



Plate 1: The proposal site, as seen from Clothall Road

The proposal site and surrounding town is situated on an area of relatively flat ground at approximately 65m AOD. The underlying geology is recorded as Holywell Nodular Chalk Formation and New Pit Chalk Formation¹, overlain by superficial alluvial fan deposits of sand and silt.

¹ <https://geologyviewer.bgs.ac.uk>



1.3 Proposed Development

The proposal, as outlined in planning application 25/01514/FP comprises: *Demolition of existing buildings and for the erection of a new shop, forecourt canopy, car and jet wash, car and cycle parking, EV vehicle charging points, hard and soft landscaping, bin stores and associated development thereto.*

As outlined in the design and access statement to accompanies the application this will include: a detached commercial retail premises with sales area and back of house storage, customer & staff WC facilities; a modern petrol forecourt with pumps & canopy; car parking for staff & customers; 2x electric vehicle charging bays; 1x Air & Water parking bay; a detached enclosed roll over car wash with modern operation and acoustic performance & mitigation standards; a jet wash with side enclosed bays; acoustic fences to separate the site to the south & east and on site commercial refuse enclosure.

2 LEGISLATION AND PLANNING POLICY

2.1 Legislation

The primary legislative framework affecting the historic environment is summarised in the appendix of this report. These pieces of legislation cover a number of different areas of the archaeological record, including: burials, Scheduled Monuments, Listed Buildings and wrecks.

Section 16 of the revised National Planning Policy Framework (NPPF) provides guidance related to heritage issues within the planning process. The chapter is titled Conserving and Enhancing the Historic Environment. This has been paired with a Planning Practice Guidance (PPG), initially published in 2014 and subsequently updated in 2019. This has been paired with a Planning Practice Guidance (PPG), initially published in 2014 and subsequently updated in 2019.

The relevant section is broken down into three separate parts, the latter two of which have their own sub-headings. The first part, Paragraphs 195-199, contains definitions and classifications, along with designations of heritage sites. It concerns the production and implementation of a policy strategy and the requirements of this for Local Authorities. The next group of Paragraphs 200-204 are included under Proposals Affecting Heritage Assets. The final group of Paragraphs 205-214 is sub-titled Considering Potential Impact and is concerned with the impact of any proposals on heritage assets. The full document can be viewed on the government website: <https://www.gov.uk/guidance/national-planning-policy-framework>.

Paragraph 018 of the PPG confirms that within each category of harm, the extent of harm may differ and should be clearly articulated. The tables in the appendix at the end of the report are designed to assist with the description of the level of potential harm. However, it should be borne in mind that it is the degree of harm to the asset's significance rather than the scale of development that is to be assessed.

2.2 Local Planning Policy

The North Hertfordshire Local Plan 2011-2031 was adopted on Tuesday 8 November 2022. The Local Plan is designed to guide the changing use of land in the district and define its future purpose². The district's approach to the historic environment is outlined in Strategic Policy 13 of the Local Plan, which is as follows:

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.

More detailed development guidance policies relevant to this report are:

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

Further policies relating to heritage comprise:

HE2 Heritage at risk

HE3 Non-designated heritage assets

HE4 Archaeology

3 METHODOLOGY

The primary aim of this Heritage Assessment is to identify the significance of heritage assets at risk of harm as a result of the development proposals, and any resulting impact to this significance arising as a result. This is in line with Policy HE1 of the Local Plan and Paragraph 207 of the NPPF, which states:

² <https://www.north-herts.gov.uk/north-herts-local-plan-2011-2031> accessed 11/08/2025

In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.

There is no specific guidance relating to Heritage Assessment; the format and contents of the report are therefore an adaptation of the standards outlined in the Chartered Institute for Archaeologists' guidance paper for Heritage Impact Assessments or Desk-based Assessments (CIfA 2017 updated 2020), Historic England guidance relating to the significance and setting of heritage assets (HE 2017, 2019; see Appendix I) and the requirements of the NPPF and local planning policy.

The principal sources consulted in assessing this site were:

- The National Heritage List for England
- A site visit
- Published and unpublished source material

The sources above have been used:

- To identify the heritage assets at risk of harm as a result of the proposals
- To identify the significance of these heritage assets, including the contribution their settings make to their significance
- To identify the contribution the proposal site makes to the significance of the identified heritage assets
- To consider possible effects, whether adverse or positive, of the scheme on identified heritage assets and on the significance of these assets
- To identify the potential for enhancement or mitigation, as necessary

Setting of Heritage Assets

No designated heritage assets will be impacted physically as a result of the proposals. The assessment therefore interrogates any potential impact to the setting of the assets, and any resulting impact to their significance.

Historic England's (2017) Guidance on the management of a setting of a heritage asset provides a definition of the term setting. This is "*the surrounding in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve.*" The use of the term setting is identified as being separate from other ones such as curtilage, character and context. The potential for harm to a heritage asset therefore involves not only physical damage to the asset but also visual and other sensory impacts within its setting.

Assessment of Harm

National and local planning policy requires the effect of a development on the identified heritage assets to be outlined. Assessment of the level of harm caused to a heritage asset (either designated or non-designated) is reliant on understanding the significance of the heritage asset at risk of impact and the extent to which the proposal site contributes to this significance. The relationship between these and any perceived harm that the development would cause can then be assessed (HE 2017, 2019; see Appendix I).

A proposed development may have no impact on the identified assets or it may sustain and enhance their significance.

Where harm to a designated heritage asset is anticipated the level of harm needs to be established. As outlined in the NPPF these are *less than substantial harm*, *substantial harm* or *total loss*. Approvals that result in substantial harm to a designated heritage asset should be wholly exceptional, and justified by a range of significant factors. Where less than substantial harm is identified the harms must be weighed against the public benefits of the proposal.

Where harm to a non-designated heritage asset is anticipated the scale of any harm to the significance of the heritage asset should be outlined, in order to allow a balanced judgement to be made.

Paragraph 018 of the PPG confirms that within each category of harm, the extent of harm may differ and should be clearly articulated. The tables in the appendix at the end of the report are designed to assist with the description of the level of potential harm.

4 HERITAGE BACKGROUND

4.1 *Designated Heritage Assets*

Designated heritage assets that have the potential to be impacted as a result of the proposed development are listed below; a description of each asset is given, including its significance and its setting. A site visit was conducted on the 13th August 2025 in order to assess the setting of these heritage assets and the potential impact of the proposed development on the identified setting. The photographs included below are illustrative of the setting and location of the assets.

Romano-British small town and Late Iron Age settlement at Baldock

The Scheduled Monument is located immediately north of the proposal site (List Entry Number: 1016305). The monument was first designated on the 11th December 1985, with amendment on the 16th January 1998; a brief outline of the monument follows below. This is derived from the List Description³, the *Baldock Extensive Urban Survey Project Assessment Report* (Thompson, 2002) and *Baldock, The Excavation of a Roman and Pre-Roman Settlement, 1968-72* (Stead and Rigby, 1986).



Plate 2: The Scheduled Monument, as seen from the public footpath that crosses it

The Scheduled Monument covers an area of 18.9ha; the settlement survives as buried archaeological remains lying beneath the buildings and grounds of Hartsfield JMI School, an adjacent agricultural field and a garden centre; a south western limb of the

³ <https://historicengland.org.uk/listing/the-list/list-entry/1016305?section=official-list-entry>

monument extends beneath a sports field known as Bakers Close while the ground underlying Clothall Road is also included.

As is evident from the name of the site, multiple phases of occupation have been identified within the scheduled area, principally dating from the Iron Age and Roman periods. The most significant source of information on the site is derived from excavations undertaken between 1968 – 1972; these were largely undertaken ahead of development to the north of the Scheduled Monument. However, areas that are now scheduled were also investigated. Further evidence of the settlement comes from aerial photographs, chance finds and smaller excavations undertaken outside the scheduled area.

While scattered Neolithic and Bronze Age remains were identified through excavation within the area of the later settlement, the earliest substantial evidence dates to the 1st century BC, the late Iron Age. The late Iron Age settlement was defined to the north east and south west by a series of burial enclosures, while the north, south and western limits of the settlement were defined by trackways. These are likely to represent the intersection of a number of prehistoric long-distance trackways, highlighting the strategic location of the settlement. Archaeological features associated with the pre-Roman settlement include enclosures, round houses, pits and wells, while to the west of the scheduled area two high status late Iron Age burials have been identified. The extent of the settlement, the presence of such high status burials and the range of material culture identified indicates that the settlement may have been a regional tribal centre, possibly an Oppidum of the Catuvellauni tribe.

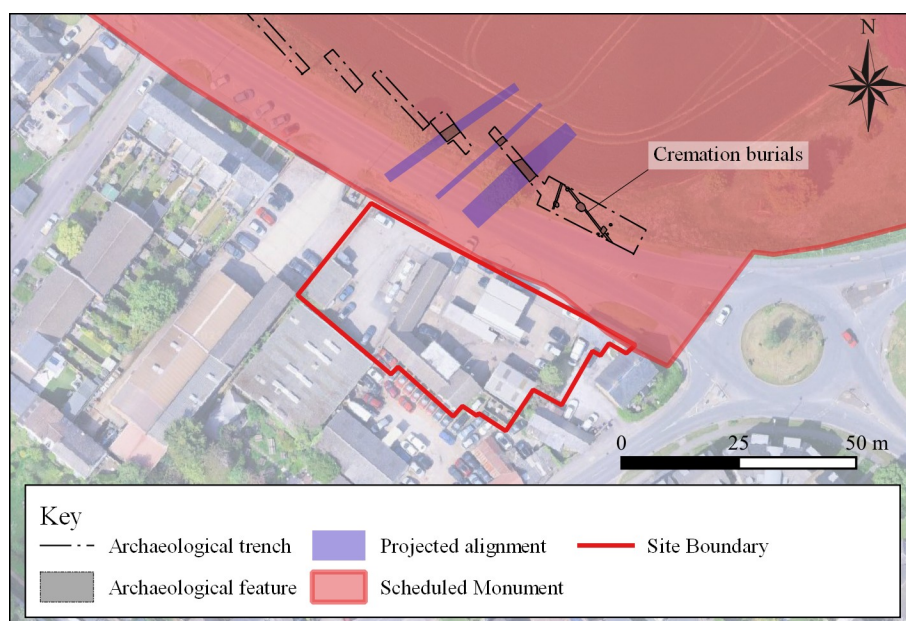


Figure 2: Archaeological features within the environs of the proposal site (after Stead and Rigby 1986)

The core of the settlement appears to have been located to the north west of the proposal site (Thompson 2002, Fig 2), however excavations undertaken immediately north identified three parallel ditches of Late Iron Age date. These were aligned on a north east – south west orientation and when excavated in 1968 were found to contain sherds of pottery dating from the Late Iron Age and early Roman periods (Stead and

Rigby 1986, p.431). Figure 2 details the location of these features and shows the projected route of the ditches based on their orientation. The orientation of the ditches suggests that they might be associated with a road or trackway that intersected the Roman road between Baldock and Braughing (now Clothall Road). An archaeological evaluation undertaken approximately 130m south west of the proposal site identified further early Roman archaeological remains, including a boundary ditch that followed the same alignment as those identified to the north of Clothall Road, perhaps further evidence of the road or trackway (Heritage Network 2004, p.9-10). Alternatively, the features may represent extra-mural settlement or agricultural activity.

The settlement continued to develop in size and density into the Roman period, with areas of occupation extending over the areas formerly used for burials. The settlement appears to have retained its Iron Age character, with the spatial arrangement of the later settlement largely respecting the earlier orientation of boundary ditches and fields. For example, the metalled trackways laid out throughout the settlement in the 1st century AD were found to follow or respect the route of earlier boundary features. Similarly, round houses predominated as the principal form of dwelling until the 3rd century. Despite this continuity the density and extent of the settlement increased significantly, with excavation and geophysical survey showing evidence for an increasingly wide range of buildings and other structures. After the 3rd century the number of stone built rectangular buildings increases, with evidence of stone walling, however the settlement (within the scheduled area at least) does not appear to have been extensively Romanised.

There is evidence that an area to the west of Clothall Road, north west of the proposal site, may have been a focus of ritual activity. The level of investigation in this area has been lower, however, the remains identified also indicate the presence of more high status buildings with a more Romanised character. It is possible that these form part of a more developed Roman town now situated under the area of the later medieval and post-medieval town.

The settlement was surrounded by a number of cemeteries; custom dictated that these were sited outside the bounds of the settlement. The presence of an early Roman cremation cemetery c.20m north of the proposal site is therefore indicative that during the period the area lay outside of the bounds of the settlement. Here eight cremation burials were excavated in advance of road widening in 1968; the burials excavated were dated to the 1st and 2nd century AD on the basis of the grave goods interred within. While the southernmost extent of the cemetery is unknown it appears to have been located alongside the main Roman road between Baldock and Braughing (now Clothall Road). Archaeological investigation undertaken at 72 – 74 South Road at the junction of Clothall Road and South Road (c.30m south east of the proposal site) did not identify any evidence of the cemetery (Heritage Network 2010, p.6).

The significance and setting of the Romano-British small town and Late Iron Age settlement at Baldock

As a Scheduled Monument the site is recognised as being a heritage asset of national importance, largely due to its archaeological interest. The List Description provides a clear assessment of the potential archaeological interest of the remains likely to be present:

Valuable archaeological remains, including foundations, walls, floors, surfaces, pits and ditches, buried beneath the present ground surface will provide further evidence relating to the dating of the settlement, the period of its occupation and the way in which it evolved in response to Roman influence. These features will also illustrate changing methods of construction, the functions of the various structures and the lifestyles, occupations and religious practices of the inhabitants.

Environmental evidence preserved within and beneath the same deposits may provide valuable insights into the diet of the occupants, and the nature of the landscape in which the monument was set.

The site has been subject to some development (and corresponding archaeological investigation), however the greater part of the site remains undeveloped and as such any archaeological remains present are likely to be well preserved. These archaeological remains will have a high level of evidential value, contributing to our existing understanding of the settlement, its layout and development and the populations who inhabited it.



Plate 3: Looking south across the monument towards the hills beyond Baldock

In regards to the communal significance of the Scheduled Monument the site can be partially accessed by the public, with a footpath crossing the larger portion of the site, and the south western limb is currently in use as a playing field. The monument therefore also features to some extent in the lives of the current residents of, and visitors to, Baldock. However, due to the lack of any above-ground remains or interpretation boards the visibility of the monument in the public realm is more limited than it might otherwise be. It should of course be noted that while a lack of public access or the survival of visible remains does not detract from the significance of the monument, it is likely to hamper wider public awareness and interest in the site.

The Scheduled Monument has an aesthetically pleasing, peaceful, and rural character that contrasts with the surrounding suburban environment and provides amenity value for the local population. It should be noted that these positive characteristics have grown from the protection of the site, and as such are not intrinsic to its significance in the same way that its archaeological value is.



Plate 4: Looking east across the Scheduled Monument from Clothall Road

The modern-day setting of the monument is defined by the close proximity of the later settlement of Baldock, which forms the backdrop to the site. This is especially evident to the south west along Clothall Road (Plate 3) and views in this direction have a suburban character. To the north east development at Clothall Common is largely screened by a mature hedgerow that borders the monument (Plate 4), creating a more rural impression. The Scheduled Monument itself forms a large area of open land on the edge of the town, providing a corridor to the countryside to the south east. More significantly for our understanding of the monument, the location of the settlement within the wider landscape aids our understanding of the organisation and development of the late Iron Age and Romano-British landscape. As noted in the List Description:

The monument is one of a number of Roman sites in the area, including the villas at Radwell and Lammas Field (the subject of separate schedulings). The relationship of these sites and the communication routes by which they are linked, are significant for the study of settlement, demographic and economic patterns during the Late Iron Age and the period of the Roman occupation.

While the relationship between these sites cannot be experienced from the monument itself there are other elements of its setting that remain more clearly legible. From the monument the chalk hills to the south east are clearly visible (Plate 3, 4), evoking the site's connection to the prehistoric route Icknield Way, which runs south east along the chalk escarpment. Therefore, while the setting of the monument is not immediately legible together these surviving archaeological sites are a physical

representation of the spatial arrangement of the landscape during the Iron Age and Roman periods, and perhaps therefore provide some insight into the organisation of local populations, settlements and transport networks.

The monument is also associated with buried archaeological remains contemporary with its use, perhaps including outlying settlements, farmsteads and field systems. This has proven to be the case, as seen through the results of archaeological investigation undertaken outside of the scheduled area within Baldock.

Contribution of the proposal site

The proposal site forms a small part of the setting of the Scheduled Monument, located on the southern boundary of the monument on Clothall Road. The existing form of the proposal site is typical of the suburban character of area and it forms part of a small cluster of light industrial units located at the junction of Clothall Road and South Street (Plate 5). In its present form the built character of the proposal site forms a neutral contribution to the Scheduled Monument; the only tangible association the proposal site has with the Scheduled Monument is its proximity.

However, the proposal site does have the potential to contain buried archaeological remains associated with the Scheduled Monument. Any remains present are likely to be contemporary with the monument and as such would provide a contribution to the evidential value of the Scheduled Monument though their potential to increase our understanding of the contemporary archaeological landscape surrounding the monument. However, further investigation would be required to demonstrate both the presence and the contemporaneity of any remains within the proposal site.

Similarly, though the proposal site does not currently provide a visual contribution to the Scheduled Monument its proximity means that unsympathetic development has the potential to result in visual distraction and alter the experience of the monument.



Plate 5: Looking north west toward the proposal site and Scheduled Monument



Plate 6: Looking south east towards the proposal site from within the Scheduled Monument



Plate 7: Looking north west along Clothall Road toward the proposal site and Scheduled Monument

5 DISCUSSION

5.1 The Impact of the Proposals on the Romano-British Small Town and Late Iron Age Settlement at Baldock

The heritage significance of the Scheduled Monument is largely derived from its archaeological interest, which relates to the potential for buried remains to be present.

However, the setting of the monument also contributes to its significance. The proposal site is located adjacent to the Scheduled Monument and therefore any development within the proposal site will be situated within its setting. The potential for indirect impact to the monument arising from the alteration to the setting of the scheduled monument must therefore be considered; this impact may be both physical and visual.

The most significant elements of the monument's setting are the landscape setting of the monument and its relationship to nearby Iron Age and Romano-British sites: this includes parts of the Iron Age and Romano-British settlement located within Baldock outside the scheduled area and also the sites and monuments within the wider landscape, such as the *Settlement Site South of Blackhorse Farm* and the *Radwell Roman Villa*.

Proposals that have the potential to result in alteration to the setting of the monument comprise: the demolition of the existing buildings on the site and the construction of the new garage and associated infrastructure, including the introduction of additional light sources into the environment; erection of a petrol price pylon. The potential impact to the monument falls into two categories; physical harm to archaeological remains located within the setting of the monument and visual harm to the setting of the monument. The proposals will not result in any change to the wider landscape setting of the monument; its intentional positioning within the landscape, and relationship to surrounding sites, will remain evident

Visual Impact

In its current form the proposal site does not contribute meaningfully to the setting of the Scheduled Monument. The proposals are likely to result in a positive change to the existing character of the proposal site; the proposals will rationalise the site, reducing clutter and creating a tidier appearance. The proposed buildings are lower in height to the existing buildings surrounding the site, including the light industrial buildings of R&D Marine and the residential property no.53 South Road, and as such will not appear overly dominant within the street scene. Similarly, the proposed use of the site is in character with the existing mixed use of this part of Clothall Road; the materials proposed are also reflective of the existing context. The aspect of the proposals that must be considered in relation to the visual impact on the Scheduled Monument therefore comes from the potential for the introduction of additional light sources that may detract from the experience of the monument.

There are some factors relating to the existing character of the site, Scheduled Monument and surrounding area that are likely to mitigate against this to some extent, in addition to mitigation measures built into the proposals themselves. The most significant consideration here is that while the aesthetically pleasing, peaceful, and rural character of the scheduled monument is a positive contributor to its overall significance, this contribution is small compared to the most significant aspect of the monument, and the reason it was designated: its archaeological value. Therefore, though issues of visual distraction must be considered, the extent to which harm will be caused as a result is likely to be low.

The existing environment of the proposal site is suburban in character; numerous streetlights are present along Clothall Road, including immediately adjacent to the proposal site. The proposal site therefore falls within the envelope of these lights and the current night time street scene is already defined by the artificial illumination of Clothall Road. This contrasts to the area of the Scheduled Monument, which lies in darkness. The proposals will not change the character of this scene, and though there may be a slight increase in light levels within the area of the service station's forecourt, it is unlikely that this will meaningfully change one's experience of the monument. Plates 3, 6 and 7 demonstrate that trees planted along Clothall Road break up views of the proposal site from the Scheduled Monument to a certain extent, reducing light spill across the monument (though the proposal site is never screened entirely and it should be noted that the area was visited in the summer, when leaf cover was at its greatest. Therefore, the extent to which the site is visible will be higher during winter months and intervisibility may increase).

In regards to the proposed development, the orientation of the principal building is such that the windows will face southeast, away from the Scheduled Monument, therefore reducing the visual imprint of the site from within the monument. Similarly, the lighting on the Clothall Road elevation will be limited to wall mounted downlighters. No lighting is proposed that faces out of the proposal site towards the monument itself; therefore, the additional lighting will be seen in context of the existing streetscene.

The fuel price pylon will introduce an additional light source. However, the orientation of the pylon at a right angle to Clothall Road will reduce its visibility from within the Scheduled Monument to some extent, and while bright in colour, the pylon does not extend above the rooflines of the surrounding buildings and thus will sit within the context of the surrounding built environment.

Archaeological Impact

In addition to visual changes, the proposal site may contain non-designated archaeological remains that would contribute to our understanding of the monument through their evidential value. Due to the size of the site, and our current understanding of the archaeological landscape, the extent to which any remains might contribute to the significance of the scheduled monument is likely to be limited compared to the overall significance of the Scheduled Monument. This will also vary depending on their level of survival, date and extent.

The proposed demolition of the existing buildings and groundworks associated with the new development may result in the truncation or complete removal of any underlying archaeological remains, resulting in a corresponding loss of any archaeological interest they may hold.

The harm to any remains within the proposal site is not likely to result in a high level of harm to the setting of the monument. However, without further archaeological investigation the archaeological significance of the proposal site remains uncertain. It is likely that a programme of archaeological investigation could mitigate the harm caused as a result of the proposals, and the results of the investigation may in fact contribute towards our understanding of the archaeological landscape surrounding the monument.

The level of harm caused to the significance of the *Romano-British small town and Late Iron Age settlement at Baldock* as a result of the proposed development is anticipated to be Negligible.

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7 APPENDIX: LEGISLATION, GRADING ASSETS & LEVELS OF IMPACT

7.1 Primary Legislation

The relevant primary legislative framework for the historic environment is contained in the following acts:

- “*The Hedgerow Regulations*” of 1997, section 97 of the “Environment Act” of 1995 gives protection to hedgerows determined to be of historic importance.
- *Town and Country Planning Act* 1990 – sets out the planning framework.
- *Planning (Listed Buildings and Conservation Areas) Act* 1990 – specific protection for buildings and areas of special architectural or historic interest.
- *Ancient Monuments and Archaeological Areas Act* 1979 – specific protection for monuments of national interest.
- *Historic Buildings and Ancient Monuments Act* 1953 – provision for the compilation of a register of gardens and other land (parks and gardens, and battlefields).

7.2 Grading Heritage Assets and Levels of Impact

As laid out in the NPPF, described above, and in Paragraph 018 of PPG 2014 (Revised 2019) ‘*what matters in assessing whether a proposal might cause harm is the impact on the significance of the heritage asset. As the National Planning Policy Framework makes clear, significance derives not only from a heritage asset’s physical presence, but also from its setting.*’ The NPPF (Annex 2) defines significance as ‘*the value of a heritage asset to this and future generations because of its heritage interest*’ and it may derive ‘*not only from heritage asset’s physical presence, but also from its setting*’. Significance is what conservation sustains, and where appropriate enhances, in managing change to heritage assets. Therefore, the assessment of the impact of a proposed development, or change to a heritage asset, either designated or non-designated, depends on considering the significance of the asset and any perceived harm that could happen to it and/or its setting (Historic England 2015). The potential harm and impacts are to be avoided, minimised, and mitigated, taking opportunities to better reveal or enhance significance, thereby ensuring any unavoidable harmful impacts are justifiable by public benefits, that can be deemed as necessary and otherwise undeliverable (Historic England 2015; Historic England 2019).

HE’s guidance document *Statements of Heritage Significance* (2019) states that an understanding of significance must stem from the interest(s) of the *heritage asset*, whether *archaeological, architectural, artistic, or historic*, or a combination of these. These must:

- Describe significance following appropriate analysis, no matter what the level of significance or the scope of the proposal.
- Be sufficient for an understanding of the impact of the proposal on the significance, both positive and negative.

- Be sufficient for the Local Planning Authority (LPA) to come to judgement about the level of impact on that significance and therefore on the merits of the proposal.

Further guidance is to be found in HE's The Setting of Heritage Assets (2017) which affirms that statements of significance need to consider:

- How the historic character of a place makes it distinctive. This may include its association with people, now and through time; its visual aspects; the features, materials and spaces associated with its history including its original configuration and subsequent losses and changes.
- Contextual relationships between the asset and any other heritage assets that are relevant to the significance including the relationship of one asset to another, same architects, or associative relationships.
- Communal value derives from the meanings of a place for the people who relate to it, or for whom it figures in their collective experience or memory.

Table 1. Criteria for assessing the significance of a heritage asset

Significance	Definition	Relevant Heritage Assets
Very High (International)	Relatively complete and predominantly static landscapes sensitive to change. Internationally significant locations or sites.	World Heritage Sites. Historic landscapes of national or international importance, whether designated or not. Extremely well-preserved historic landscapes with exceptional coherence, time-depth, or other critical factors.
High (National)	Locations or Buildings that have little ability to absorb change without fundamentally altering its present significant character. Well preserved historic landscapes, exhibiting considerable coherence, time depth and other factors. Sites associated with historic nationally and internationally important people or groups.	Scheduled Monuments: Archaeological sites of schedulable quality and significance. Listed Buildings (all grades). Registered Historic Parks and Gardens (all grades). Historic Battlefields.
Medium (Regional)	Locations and Buildings that have a moderate capacity to absorb change without significantly altering their present character, has some environmental value, or is of regional or high local importance.	Local Authority designated sites (e.g.: Conservation Areas and their settings). Undesignated sites of demonstrable regional importance. Averagely well-preserved historic landscapes with reasonable coherence, time-depth, or another critical factor.
Low (Local)	Locations and Buildings tolerant of change without detriment to its character, is of low environmental value, or is	Sites with significance to local interest groups. Sites of which the significance is limited by poor preservation and poor survival of

	of moderate or minor local importance.	contextual associations.
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Proposed developments and changes to heritage assets and their setting can be described as positive, negative, or neutral (Table 3). Definitions of terms used to describe the impact of damage on a heritage assets significance, and how this can be assessed, is contained in the NPPF and PPG (Section 18). From these sources a list of criteria regarding the physical and visual impact of a proposal on the site, building and its setting can be made. These define the degree of harm that can potentially be caused to a heritage asset and facilitates balancing the potential harm identified against the benefits of the proposal.

Table 2. Criteria for the assessment of the degree of harm to the significance of an asset

Degree of Harm	Definition
Total Loss	Total removal of the significance of a heritage asset.
Substantial	Serious harm that would remove or vitiate the significance of a heritage asset. Change to a heritage asset's setting, such that the significance of the asset would be substantially reduced (e.g.: the significance of a designated heritage asset would be reduced to such a degree that its designation would be questionable; the significance of an undesignated heritage asset would be reduced to such a degree that its categorisation as a heritage asset would be questionable).
Less than substantial – High	High level of harm that could be serious, but not so serious as to vitiate or change the significance of a heritage asset. Partial physical loss of a heritage asset, or its setting, or both, such that the asset's significance would be materially affected/considerably devalued, but not totally or substantially lost.
Less than substantial – Moderate to Minor	Slight loss of the significance of a heritage asset. This could include the removal of fabric that forms part of the heritage asset, but that is not integral to its significance. Some harm to the heritage asset's setting, but not to the degree that would result in a meaningful devaluation of its significance. Perceivable level of harm that is enough to be noticeable or material, but insubstantial relative to the overall interest of the heritage asset.
Negligible	A very slight change to a heritage asset which does not result in any overall harm to its significance. Very minor change to a heritage asset's setting such that there is a slight impact, but not materially affecting the heritage asset's significance.
No Impact	No effect to the heritage asset or its setting.

Table 3. Criteria for assessing the impact of change to a heritage asset

Impact	Definition
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Positive	Proposed changes represent a positive strategy for the conservation and enjoyment of the heritage asset and positive contribution to the character of the building. Such changes may: • restore the building to the original structure or fabric • sustains, enhances, or better reveals the significance of the heritage asset • positive contribution to the local character and distinctiveness
Neutral	Proposed changes represent a neutral strategy for the conservation and enjoyment of the heritage asset and neutral contribution to the character of the building. • very minor change to a heritage asset's setting such that there is a slight impact
Negative	Proposed changes represent a negative strategy for the conservation and enjoyment of the heritage asset and negative contribution to the character of the building. Such changes may: • lose or remove original features of the building • causes the asset's significance to be materially affected/considerably devalued • negative contribution to the local character and distinctiveness