



Historic England

EAST OF ENGLAND OFFICE

PLANNING ACT 2008 (AS AMENDED) – SECTION 88 AND THE INFRASTRUCTURE  
PLANNING (EXAMINATION PROCEDURE) RULES 2010 (AS AMENDED) - RULE 6

REPRESENTATIONS OF THE HISTORIC BUILDINGS AND MONUMENTS  
COMMISSION FOR ENGLAND (HISTORIC ENGLAND)

APPLICATION BY HIGHWAYS ENGLAND

FOR AN ORDER GRANTING DEVELOPMENT CONSENT FOR THE: A47 WANSFORD  
TO SUTTON DEVELOPMENT CONSENT ORDER

APPLICATION REF: TR010039

OUR REFERENCE: PL00331862

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## 1. Introduction

- 1.1. The Historic Buildings and Monuments Commission for England (HBMCE) is better known as Historic England, and we are the Government's adviser on all aspects of the historic environment in England - including historic buildings and areas, archaeology and historic landscape. We have a duty to promote conservation, public understanding and enjoyment of the historic environment. We are an executive Non-Departmental public body and we answer to Parliament through the Secretary of State for Digital Culture, Media and Sport (DCMS).
- 1.2. The development would be for a new 2.6 km section of dual carriageway on the A47 from Wansford in the west to Sutton in the east, including additional infrastructure and connecting roads.
- 1.3. As set out in our S.56 response we are aware the proposed development lies in a highly sensitive area for the historic environment and will have a direct impact upon one scheduled monument and is within the setting of a range of other high value heritage receptors.
- 1.4. Historic England has been engaged in pre-application discussions with the applicant's heritage consultants at and before the Scoping Opinion Stage of the proposals and our engagement is summarised in Section 6.4.10 of Chapter 6.1 and elsewhere in the Environmental Statement (ES).
- 1.5. The applicant has provided a full ES with a Cultural Heritage chapter (see Chapter 6) which includes the results of geophysical surveys and archaeological trial trenching.
- 1.6. Historic England considers the baseline data provided in the Cultural Heritage Chapter of the ES and its appendices, to be suitable for this assessment. The list of designated and non-designated heritage assets set out in Appendix 6.1 (Cultural Heritage information) are likewise appropriate. Similarly, we consider the methodology used to assess the cultural heritage datasets within Chapter 6 is sufficient for this development.
- 1.7. We note the ES has identified 12 key designated heritage assets with a potential to experience significant effects and one non-designated heritage asset. We confirm this accord with our own assessment of the heritage receptors that are likely to be most affected by the scheme. Of those, the following are within the remit of Historic England for comment.





- Scheduled monument known as the 'Cropmark site of a barrow cemetery and a quadrilateral ditched enclosure, together with pits and a pit alignment, approximately 837 m south-east of Sacrewell Farmhouse. (LEN 1006796)
- Scheduled monument of Wansford Bridge (LEN 1006835) also listed at Grade I
- Grade II\* listed Sacrewell Mill, Mill House and stables (LEN 1127493)
- Grade I listed Churches of St Michael at Sutton (1127517), Church of John the Baptist at Upton (LEN 1127440) and the Church of John the Baptist, Wansford (LEN 1127440)
- Conservation Areas of Thornhaugh, Stibbington and Sutton

Advice on grade II buildings, non-designated assets and archaeological matters will be provided by Peterborough District Council's Conservation and Archaeological Teams and are not considered further within this written representation.

1.8. We will also provide comments on the non-designated but significant locally listed building known as,

- Wansford Road Railway Station (ES References 53529, WAN1, WAN2, WAN11)

1.9. We also note the applicant has provided detailed analysis of the significance of heritage assets (see Table 4: Assessment of Value & Sensitivity) and impact (Table 5: Assessment of Impacts) in Appendix 6.1 Cultural Heritage Information.

1.10. We broadly support the conclusions reached in the ES for the majority of the assets considered. However, Historic England have expressed concerns about the use of matrices to assess impacts and harm, particularly in relation to the translation of language around the significance of impacts from EIA assessment to the language used in Planning Policy documents such as the NPPF and the NPSNN. We have therefore provided additional narrative in relation to a small number of assets below.

## 2. Designated Heritage Asset: Barrow Cemetery Scheduled Monument

### *Introduction*

2.1 Historic England's primary consideration in relation to this development, is the impact upon the scheduled monument known as,





*'Cropmark site of a barrow cemetery and a quadrilateral ditched enclosure, together with pits and a pit alignment, approximately 837m south-east of Sacrewell Farmhouse'*  
List Entry Number 1006796 (See also ES Chapter 6.6.8).

## *Significance*

- 2.2 This is the buried remains of up to seven prehistoric burial sites known as ring ditches or ring barrows. The scheduled monument also includes settlement evidence such as the quadrilateral enclosure, and also a number of smaller, overlapping single-ditched enclosures, and a prehistoric pit alignment. All of these remains are only visible as cropmarks on aerial photographs. Although there is no surface expression of these features, there will be extensive and well-preserved archaeological features present below the plough soil.
- 2.3 The ring ditches are believed to represent the buried remains of a Bronze Age round barrow cemetery, which is one of the largest and most significant grouping of burials in the area. The enclosures are believed to relate to the use of the land as a farmstead in a later period of prehistory and into the Roman Period. Together they show a continuity of activity in the landscape over several millennia.
- 2.4 The ring ditches vary considerably in size and complexity. The smallest one is some 15 m in diameter and has a single large ditch around the outside. There are also several more complex burials within the group, that include a large ring ditch in the middle of the cemetery some 40 m wide, with evidence of internal features.
- 2.5 There is also a barrow that sits immediately adjacent to the A47 in the south western area of the scheduled monument. This is also a complicated double ring ditch, which is both unusual and rare in its own right. The ES Chapter 6 describes the significance and survival of this feature well and provides excerpts from the geophysical surveys (see 6.6.8 - 6.6.10 and Captions 1 and 2).
- 2.6 The features on Toll Bar Field sit on a terrace above the northern side of the river Nene which rises gently away from the northside of the existing A47. The road forms the southern boundary of the scheduled monument. The site is bounded by a stream to the north (now part of the tail race for Sacrewell Mill), which joins a stream to the east of the site. These then flow as a small tributary down to the Nene. The cemetery, and then the later period settlements, were situated across a naturally draining area of land at the confluence of these streams and overlooking the river. Locations such as this have long been chosen as the focus for prehistoric burial activity.



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- 2.7 The list entry for the monument was reviewed in 2018 and the site has been subject to a geophysical survey which is reproduced in the ES (see Appendix 6.5). The research undertaken for the review of the designation, combined with the geophysical survey has confirmed the presence of the prehistoric cemetery. The review of the designation has also resulted in the designated area being extended to the north and it now includes the full extent of the known settlement. The survey reproduced in appendix 6.5 shows the former smaller area of the monument prior to its extension in 2018
- 2.8 The remains found here are designated for the following reasons. These are also set out in the list entry,
- **Period:** the round barrow cemetery and ditched enclosure demonstrate a significant sequence of development throughout the late prehistoric and Romano-British periods and offer an important understanding of the economic and social activities within the area during the period of occupation;
  - **Survival:** despite having previously subject to ploughing, aerial photographs and geophysical (magnetometer) survey have shown that archaeological features survive as buried deposits;
  - **Potential:** deposits in the infilled ditches and the buried land surface will preserve important archaeological information relating to the construction and use of the site, as well as the impact of prehistoric and Roman occupation on the wider landscape;
  - **Finds:** the abundance of Romano-British finds recovered from the site, all indicate a prolonged period of occupation;
  - **Group value:** a study of the monument and its relationship to other prehistoric and Roman sites in the area will make a valuable contribution to the understanding of later prehistoric occupation and funerary activity in the Nene Valley, along with civil and military control during its Roman occupation
- 2.9 The monument has been designated since its discovery in 1962, and although there have been many other important archaeological discoveries in the area, this site is still one of the larger groups or clusters of surviving prehistoric burials and is an archaeological asset of national importance. We confirm our view that the asset holds high heritage values in relation to historical, evidential and social value and has a high overall significance.

## *Impact*



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- 2.10 As set out in the ES, the impact of the development on the scheduled monument has largely been avoided. This is through mitigation by design. The new dualled route primarily follows the line of the existing road, and the new carriageways would be built to the south of the existing road. The road corridor and the development boundary respects for the most part the southern edge of the monument and avoids impacts upon it.
- 2.11 In particular the works would avoid the southern most of the ring ditches. This is one of the more important features in the cemetery group (see ES Chapter 6.6.8 - 6.6.10 and Captions 1 and 2), and the avoidance of impacts on this particular barrow was an important design and mitigation consideration, which we have supported.
- 2.12 As set out in the ES (see 6.6.8 and 6.7.10) a small triangular section of the scheduled monument measuring 6 m x 9 m or some 27 m<sup>2</sup> is within the red line boundary. This is a small but direct impact upon the monument which would result in a permanent change. As set out in the ES, there are no known features of high evidential or archaeological significance in this part of the scheduled monument.
- 2.13 Because it is small but direct impact, we consider that in regard to the EIA process it is still a significant effect and would represent harm to a designated heritage asset in terms of planning Policy. The degree of harm would, in our view, be less than substantial in nature.
- 2.14 The changes to the road corridor would also have the potential to result in a small change to the significance of the asset through a development within its setting. This is from an erosion of the rural setting of the monument to the south and an increase in the separation of the river and monument. We would also consider that this impact would need to be considered as a harmful residual effect in EIA terms. But again, the degree of harm to the significance of the asset from changes to its setting is less than substantial in nature and at the lower end of the spectrum.

### *Policy*

- 2.15 The avoidance of direct impact on designated assets is an important principle and direct impacts on scheduled monuments are rare. Policy directs us towards sustaining and enhancing assets (see NPSNN 5.130) and great weight is given to their conservation in decision making (see NPSNN 5.131). Likewise, any impacts, significant effects or harm need clear and convincing justification (NPSNN 5.131).





- 2.16 In addition, Para 5.132 recognises that 'any' harmful impact on the significance of a designated heritage asset should be weighed against the public benefit, and that the greater the harm, the greater the justification that will be needed. In this case policy 5.134 is also relevant in that 'Where the proposed development will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal...'
- 2.17 The 2021 version of the National Planning and Policy Framework (NPPF) is also relevant in relation to the principles required to test this development. In particular, it establishes a presumption in favour of sustainable development in the planning system (paragraphs 7, 8, 10 and 11) which also identifies protection of the historic environment as an important element of achieving sustainable development. Further policy principles relating to the historic environment are set out in Chapter 16 of the NPPF,
- 2.18 Paragraph 199 requires the planning authorities to place 'great weight' on the conservation of designated heritage assets, and states that the more important the asset the greater the weight should be, 'this is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance'.
- 2.19 Paragraph 200 States that 'any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification'.
- 2.20 Paragraph 202 states that where a development proposal will lead to 'less than substantial harm' to the significance of a designated heritage asset, this harm should be 'weighed against the public benefits of the proposal...'
- 2.21 Paragraph 203 also goes on to state states that 'the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. 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.'

### *Historic England Position*

- 2.22 We confirm our view that the Scheduled Monument has very high heritage values, is of national importance, and therefore direct impacts and impact upon the setting of the asset should be avoided as far as possible.







- 2.23 During pre-application discussions the stated objective of the applicant, and therefore the primary mitigation, was through a design led approach that sought to keep the road on the same alignment as the existing carriageway. This avoided all direct impacts upon the scheduled monument, and we have supported this approach.
- 2.24 During the later stages of the pre-application process a design modification was put forward which placed a small triangular section of the scheduled monument within the scheme's development boundary. This design modification allowed a re-alignment of the new road to the east which, in turn resulted in a smaller footprint of the scheme within the floodplain of the river Nene.
- 2.25 Historic England understands from discussions with the applicant that this would result in a significant reduction in the environmental impact of the development upon the floodplain of the Nene and this meaningfully reduces the land that would need to be acquired for the scheme. Justification for this impact, and in particular for this element of the scheme are provided in the ES.
- 2.26 We are therefore aware that this change in alignment, if consented, would result in small but direct residual impact on the scheduled monument. The proposed intervention would avoid the areas that are of higher evidential and historical value (and one of the most important barrows in the group) and the overall significance of the scheduled monument would be retained. The ES states the mitigation for loss if consented would be through excavation of the impacted area and public dissemination of the results.
- 2.27 We have therefore concluded that although this is a significant effect, the degree of harm is less than substantial in planning policy terms
- 2.28 We have also considered the impact of the development upon the significance of the asset through a change in its setting. Although there will be a clear change in the setting of the asset, we do not consider this will greatly affect or increase the effects or the level of harm to the asset overall.
- 2.29 As is set out in the NSPNN we are aware it is for the Examining Authority (ExA) to weigh that balance in relation to the harm and benefit. The ExA would therefore need to be content that the benefits would outweigh the harm and that the impact can be justified in terms of those tests set out in NPSNN. We do not consider policy 5.1.33 would apply





in this case, and therefore the Secretary of state would need to have regard to policies 5.130, 5.132 and 5.134 in the decision-making process. In terms of the NPPF this is also set out in paragraphs 200 and 202.

- 2.30 As noted in 6.7.10, Historic England have requested that evidence is provided to show that the impact upon the monument is justified by the reduction in environmental impact elsewhere on the scheme and by the scheme itself. We have been reassured this is the case, and that this information and the resulting public benefits of the scheme are set out fully in the ES. We can confirm that this is also signposted in the heritage chapters.
- 2.31 Given a small area of the monument is within the scheme boundary, the DCO will take the powers of the 1979 Ancient Monuments and Archaeological Areas Act (The 1979 Act). The ExA would therefore need to be content that the provision for archaeology within the DCO is sufficient to ensure this archaeological work is discharged appropriately Act.
- 2.32 At present however we are concerned the DCO provisions does not reference Historic England and we consider this is a matter that would need to be amended or clarified prior to approval.

### *Conclusion*

- 2.33 We have concluded that the development would result in a small direct and residual impact upon the monument. This would be a significant effect and in policy terms would result in harm to a designated heritage asset. We have however concluded this would be less than substantial in nature, for the reasons given above.
- 2.34 We can confirm that we accept the design adopted by the applicant in relation to this asset, and the position with regards to impacts. In doing so we have considered both the direct impact upon the monument and changes that would occur to its setting.
- 2.35 The wording of the DCO provision does not reference Historic England. This remains a concern going into the examination.

### 3.0 Other Designated Heritage Assets

#### *Sacrewell Mill*

#### *Significance*





- 3.1 The complex at Sacrewell Mill, consists of the mill, the Mill House and stables wing (LEN 1127493) which are listed at Grade II\*. The buildings represent a well preserved early 18th Century mill, with the house joined at right angles to the mill with a stable wing to the north. The complex is roofed in the famous Collyweston stone slates.
- 3.2 This is a fine set of buildings, and the intact nature of the mill, complete with working mill machinery, cast iron overshot wheel, wheel pit, and internal machinery makes this an additionally rare and important heritage asset. Its importance is enhanced through its association with the Sacrewell Farm visitor centre, which provides public access to the mill. The mill therefore derives significance from high evidential, historical, aesthetic values. Its accessibility to the public adds high social and communal attributes to the value of this asset.
- 3.3 The group derives additional significance from its informal setting which includes the mill yard and lane, and its associated waterbody. This includes the mill stream and mill pond to the east of the main building, and the tail race which is downstream of the mill to the west.

### *Impact*

- 3.4 There is no impact from the development upon either the buildings or the stream and water bodies that are integral to the mill. These run primarily east to west and are not in area affected by the development. The dualling works however mean that a new southern access and underpass is required to Sacrewell Farm and the Mill, which would be from the new Wansford East roundabout.
- 3.5 The ES rightly concludes there would be impacts during construction and although adverse, would be temporary. There would however also be some permanent changes to its setting from the development. Our primary consideration is therefore the impact of the development upon the significance of the mill from residual changes within its setting.
- 3.6 We have assessed the mill and although the site is screened by mature trees, we are of the view the changes to the area to the south of the farm are likely to result in a localised erosion of the rural and agricultural setting of the mill. This would be exacerbated by the changes to the southern approach for which a new modern underpass is required. This land and the southern access contributes to the setting of the asset and therefore the changes have the potential to be harmful in policy terms.





## *Policy and Position*

- 3.7 In relation to this asset, we consider the primary consideration would need to be given to sustaining and enhancing assets, including the 'contribution of their settings' (see NPSNN 5.130). In addition, great weight is given to their conservation in decision making (see NPSNN 5.131), and this policy goes on to say that significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Likewise, any impacts, significant effects or harm need clear and convincing justification (NPSNN 5.131).
- 3.8 In terms of the assessment Historic England can confirm that we are broadly in agreement with the applicant's assessment of this assets as set out in Chapter 6.7.17 and Table 6.6. and agree with the conclusion that the harm to this asset would be worse during construction.
- 3.9 We have however concluded there would also be a modest residual impact and effect from the permeant changes to the road network south of the buildings, and through a small loss of its setting. This is through changes to the way in which the asset would be approached from the south. In our view, this is likely to result in some harm to the significance of this highly designated asset. Overall however this would however be a relatively modest level of harm and at the lower end of less than substantial.
- 3.10 Again, we do not consider policy 5.1.33 would apply in this case, and therefore the Secretary of state would need to have regard to polices 5.130, 5.132 and 5.134 in coming to a decision. Given the policy considerations the ExA would therefore need to be content that the benefits outweigh the harm and that the impact can be justified in terms of those tests set out in NPSNN.

## *Wansford Bridge (LEN 1006835)*

- 3.11 Wansford Bridge is both a Scheduled Monument and is listed at Grade I. It is a fine limestone bridge which formerly carried the Great North Road over the River Nene. Consisting of twelve arches; and dating variously to c. 1577 and repaired in 1674, 1672 and 1795. It replaced an earlier wooden bridge and continued as the main road bridge until the village was bypassed in 1929.
- 3.12 Although of high significance and dual designated, the assessment work has identified the asset would not be visible either to or from the development and therefore the effect of the proposal would not be significant in EIA terms. We can confirm that we







support this conclusion provided by the applicant and do not have any further comments in this regard

## *Churches and Conservation Areas*

- 3.13 We confirm we have also considered the Grade I listed churches at Sutton, Upton and Wansford and the Conservation Areas of Thornhaugh, Stibbington and Sutton. We note their significance as designated heritage assets, but we do not have any further comments regarding these assets at this time.

## 4.0 Non-Designated Heritage Asset - Wansford Road Station

### *Significance*

- 4.1 As set out in the ES (chapter 6.6.61) the A47 currently passes over a disused section of the former Stamford to Wansford railway line. The railway opened in February 1857 and was originally designed to connect the area between Stamford and Wansford to the London and North Western Railway line. Commercially challenged, heavily opposed by the adjoining Midlands line and beset with issues it eventually closed in 1931. The route had 4 stations located at Barnack, Ufford, Wansford Road and Wansford.
- 4.2 A small section of the disused line which includes the former Wansford Road Railway Station is within the scheme boundary. Built in 1867, the station is constructed from local limestone, it comprises a single storey central station building with side extensions. It is locally listed (see ES reference WAN1), and the station group also includes a large section of the original platform, the original gates and gate piers at the road access from the A47, and a contemporary linesman's hut.
- 4.3 The group is completed by a second locally listed structure, which is a road bridge (ES reference WAN2). This asset is described in the ES as an 'excellent example of a skew arch bridge with a five-ring brick barrel displaying fine workmanship throughout. The asset is built of local limestone in a rusticated finish with red brick detailing'.
- 4.4 Although this is a very good group of railway assets with high heritage value, they were assessed for designation in 2018 by Historic England and did not to meet the test to be added to the National Heritage list. The station for example had been much altered when converted into a dwelling and in the 80 or so years between the station closing and the designation review. The bridge and other assets were also deemed not sufficiently unusual.







- 4.5 Former rail infrastructure does have considerable public interest and has strong communal and social values. The station buildings, the bridge, the railway line, the intact section of platform, linesman's hut, the gates and gate piers, make a good collection of interrelated contemporary railway assets with both group value and a degree of significance.
- 4.6 Although the station and bridge are not formally recognised on the National Heritage List they have been identified as important and placed on the local list maintained by the Local Planning Authority. They are therefore defined for the purposes of this assessment as Non-designated Heritage Assets (NDHA).
- 4.7 Because of the interrelated and contemporary nature of the railway infrastructure, the route and cut for the railway line, sections of platform, linesman's hut, gates and gate piers form a part of the setting of the locally listed NDHA's. They contribute positively to the significance of the NDHA's and enhance their value.
- 4.8 We note a degree of ambiguity in relation to the status of the former railway line, the hut, platform, gates and gate piers as to their status as locally listed assets or as non-designated heritage assets and we agree that clarification from the LPA as to their status would be useful to support this examination.

### *Impact*

- 4.9 The development requires total demolition of the station building, part of the platform, and the demolition and removal of the gates and gate piers. The ES (see 6.6.8) notes a section of the platform and linesman's hut could be retained in situ. The demolition of the bridge is not part of the development and the general arrangement plans (ES Chapter 2.6, Sheet 4) shows the bridge would be retained and used as a maintenance and access track and cycle path. The route of the former railway line would also be retained.
- 4.10 The works would therefore result in a total loss of significance of the station building. We consider this to be a detrimental residual effect in EIA terms which is equivalent to substantial harm in planning policy terms, albeit for a NDHA.
- 4.11 The loss of a part of the platform, and removal of the gates and gate piers represent a total loss of significance for these features and would also be a significant effect and harmful in policy terms. As they also form part of the setting and contribute to the significance of the non-designated assets (station and bridge), their removal would





therefore also result in a harm to the significance of the NDHA's from a loss of features that contribute positively to their setting.

## *Policy*

4.12 The work proposed at this location is set out in the ES and the justification is provided and signposted in the heritage chapter. In policy terms the NPSNN as a more senior policy document does not provide much detail with regards to non-designated heritage assets and for example paragraph 5.131 & 5.133 refer only to designated heritage assets.

4.13 The 2021 revised version of the NPPF is however more helpful in direction with regard to this situation and for example paragraph 203. States that,

*'...the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. 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.'*

4.14 Paragraph 5.139 of the NPSNN does however state that,

*'A documentary record of our past is not as valuable as retaining the heritage asset and therefore the ability to record evidence of the asset should not be a factor in deciding whether consent should be given.'*

4.15 NPSNN 5.140 also says that,

*'Where the loss of the whole or part of a heritage asset's significance is justified, the Secretary of State should require the applicant to record and advance understanding of the significance of the heritage asset before it is lost (wholly or in part). The extent of the requirement should be proportionate to the importance and the impact.'*

## *Historic England's Position*

4.16 We note these features are primarily outside of Historic England's remit and we recommend the ExA take into consideration the views of the Councils specialist Conservation team with regards to this asset group.





- 4.17 We do however consider that together they form a good grouping of railway related infrastructure and they have retained heritage values and significance as heritage features albeit in a local context. The loss of significance for some assets would be total, and there would be additional harm to the setting of the retained assets. In our view this loss and the harm to the significance of the remaining assets from the development within their setting is regrettable but accept it is unavoidable.
- 4.18 We note the applicant has made provision for recording these assets (see ES 6.8.6, and 6.8.7). We would consider this an appropriate response to satisfy NSPNN paragraph 5.140, as would an approach that seeks to recover original building materials during demolition (as set out in the ES see chapter 6.8.9). We consider this should also include the gates and gate piers and platform materials.
- 4.19 As set out in NSPNN paragraph 5.139 this response is not as 'valuable' as retaining the asset and would not make up for the overall loss of significance and heritage values.
- 4.20 The ExA would therefore need to give consideration to the policies set out in the NPSNN at 5.139 & 5.140, and we also recommend that regard is given to paragraph 203 of the NPPF when coming to a decision.
- 4.21 We do however wish to note that discussion are on-going between the applicant (as owner of the station group) and other local parties with regard to controlled demolition and relocation of a number of assets in the Station building group. Including the main Station building itself.
- 4.22 In our view If this course of action, namely recording, careful demolition and rebuilding (we recommend this includes the gates, gate piers and platform) could be secured, then some elements of the significance of the buildings would potentially be retained. Again, we recognise this is not as valuable as retaining the assets in situ. It is however arguable that the overall heritage harm and the negative effects would be reduced if this approach was successful, and some significance would be vested in the building at a new location. Provided this location allowed for public access and interpretation.
- 4.23 We therefore consider that the applicant should be asked to provide further details to the ExA in relation to this matter. In particular, confirmation is required that this outcome is available to the applicant and details of the mechanism by which it would be secured, as per paragraph 204 of the NPPF.





## 5.0 Written Scheme of Investigation (WSI) and Development Consent Order (DCO)

### *WSI*

- 5.1 The Cultural Heritage Chapter of the ES (Chapter 6) identifies a wide range of non-designated heritage assets within the DCO application boundary and wider study area. The archaeological surveys already undertaken have identified previously unrecorded buried archaeological remains and a high potential for other non-designated heritage assets and archaeological deposits to be present within the application site boundary.
- 5.2 Advice regarding the impact of the proposed scheme on non-designated archaeological heritage assets is being provided by Peterborough City Councils archaeological specialists. However, Historic England retain an appropriate interest in the small area of the scheduled monument that is within the application boundary, as well as other non-designated archaeological heritage assets also within the boundary. This is in our capacity as a provider of specialist archaeological science advice to the both the Council's Archaeological Advisors and to the Applicant and their Archaeological Consultants and Contractors. We accept that approval of the scheme WSI is however primarily a matter for the LPA and their archaeological advisors.
- 5.3 Consequently, we confirm our view that should consent be granted then Historic England would need to be consulted on the draft Environmental Management Plan and the Archaeological Written Scheme of Investigation. We note the WSI has not yet been produced, however the applicant has stated in the ES (see 6.8.14 to 6.8.20) that Historic England will be a consultee in drawing up the protocol.
- 5.4 In relation to 6.8.18, Historic England would normally anticipate an Outline WSI to have been supplied with the ES. This is in order to provide structure and chapter headings for a subsequent scheme specific detailed WSI. We note that PCC has stated that they would prefer archaeological WSI to be written by the appointed archaeological contractor. Given this approach we would be content for this work to be managed post determination provided the ExA and PCC are content there are sufficient safeguards within the DCO wording to ensure the delivery of a full archaeological mitigation strategy.

### *DCO wording.*

- 5.5 Given the discussion set out in our advice above in relation to the impact upon the Scheduled Monument, we are aware the DCO if granted would assume the statutory powers for consenting works to a Scheduled Monument.







- 5.6 Under Chapter 6 of the ES it is noted that Historic Buildings and Monuments Commission for England or Historic England should be a consultee on the Environmental Management Plan. Given that works will be undertaken within the Scheduled Monument we would consider this approach as appropriate.
- 5.7 We would however anticipate that this also needs to be reflected in the wording of the DCO at Schedule 2. We are not a named party in the DCO nor noted in Scheduled 2, and furthermore the DCO does not acknowledge either the Historic Buildings and Monuments Commission for England or Historic England.
- 5.8 In our view the archaeological provision in the DCO would need to be rectified with amended wording to address this matter and we recommend the ExA seek further information from the applicant in this regard.
- 5.9 The applicant would also need to take responsibility for amending the statutory list following works to the scheduled monument and this would also need to be noted as a provision within the DCO and with an appropriately worded section in the ES. Again, we recommend the ExA seek further information from the applicant over this matter
- 6.0 **Conclusion**
- 6.1 Historic England are broadly content with the proposed layout and design. We have provided further information with regards to the scheduled monument and the non-designated heritage assets.
- 6.2 In relation to the barrow group scheduled monument we concluded that the development would result in a small direct and residual impact. This would be a significant effect and in policy terms would result in harm to a designated heritage asset. We have however concluded this would be less than substantial in nature.
- 6.3 With regards Sacrewell Mill, we concluded there would also be a modest residual impact and a small loss of its setting. This is through changes to the road network to the south of the buildings. This would result in some harm to its significance but at the lower end of less than substantial.
- 6.4 We have also identified the demolition of Wansford Road Station would result in substantial harm to a non-designated heritage asset, and there would be additional







harm to the setting of a retained non-designated assets from the loss of the station and other features associated with the station. Due to the design and layout of the road this is regrettable but unavoidable, however further assurances should be sought in relation to the proposal to carefully demolish and rebuild the building at another location.

- 6.5 In relation to the Historic Environment matters and in coming to a decision the ExA would therefore need to weigh the harm against the benefits, as set out policy.
- 6.6 We do have some concerns with regards to the DCO wording and the role of Historic England. We consider these are matters that would need to be addressed prior to the consent being granted

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14th February 2022



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