



# Luton Borough Council

## Marsh Farm Mixed Use Development

### Archaeology and Heritage Desk-Based Assessment

**June 2013**

Ropemaker Court, 11-12 Lower Park Row, Bristol, BS1 5BN

Tel: 0113 219 7109

Email: [martin.brown@wyg.com](mailto:martin.brown@wyg.com)



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### Document Checking:

Prepared by:	Martin Brown Principal Archaeologist	Signed:	
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Checked by:	Kirsten Holland Principal Archaeologist	Signed:	
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Verified by:	Steve Mustow Director	Signed:	
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## 1.0 Introduction

This Archaeological and Heritage Desk-Based Assessment has been prepared by Martin Brown, Principal Archaeologist, WYG on behalf of Luton Borough Council to inform an outline planning application for new mixed use development at Marsh Farm, Luton, Bedfordshire.

### 1.1 Aims and Objectives

In accordance with the Institute for Archaeologists (IfA) standard definition of a desk-based assessment (Standard and Guidance for Desk-Based Assessment, 2012):

Desk-based assessment will determine, as far as is reasonably possible from existing records, the nature, extent and significance of the historic environment within a specified area. Desk-based assessment will be undertaken using appropriate methods and practices which satisfy the stated aims of the project, and which comply with the Code of conduct, Code of approved practice for the regulation of contractual arrangements in field archaeology, and other relevant by-laws of the IfA. In a development context desk-based assessment will establish the impact of the proposed development on the significance of the historic environment (or will identify the need for further evaluation to do so), and will enable reasoned proposals and decisions to be made whether to mitigate, offset or accept without further intervention that impact.

This study examines the cultural heritage potential of the proposed development site and the surrounding area. The aim of the study is to:

- Identify recorded cultural heritage sites within the site boundary;
- Identify the potential for previously unrecorded sites to be present within the site;
- Identify potential impacts and mitigation strategies where appropriate; and
- Make recommendations for further work where required.

Cultural heritage within this context includes all buried and upstanding archaeological remains, built heritage sites, historic landscapes and any other features that contribute to the archaeological and historic interest of the area.



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This baseline assessment considers the cultural heritage potential within the site itself, the surrounding area and wider local and regional context. This assessment does not attempt to plot and review every archaeological find and monument; rather it aims to examine the distribution of evidence and to use this to predict the archaeological potential of the study area and the likely significance of the development proposals on those remains.

### 2.0 Site and Development Description

The development site is located to the north west of Luton, Bedfordshire. The site is centred on TL 06500 25500 (506500, 225500) and lies approximately 125m above the Ordnance Datum. A site location plan can be seen in Appendix A.

The site extends to approximately 6 hectares. The site is currently open ground, but was previously occupied by Holy Cross Church and housing. The boundary of the site is illustrated on Figure 2, Appendix E. Photographs of the site can be seen in Appendix B.

The site is currently accessed from Purway Close. The Moakes defines the north western boundary of the site, Northwell Drive and a large roundabout to the north and north east and a footpath to the south east.

The proposed development comprises construction of a residential development with associated, supporting retail units as part of a regeneration agenda. The reader is referred to the Design and Access Statement and submitted application drawings for full details.

### 3.0 Methodology

#### 3.1 Assessment Methodology

Impact assessment has been carried out through the consideration of baseline conditions in relation to the elements of the scheme that could cause cultural heritage impacts. Baseline conditions are defined as the existing environmental conditions and in applicable cases, the conditions that would develop in the future without the scheme. In accordance with best practice this report assumes that the scheme will be constructed, although the use of the word 'will' in the text should not be taken to mean that implementation of the scheme is certain.

No standard method of evaluation and assessment is provided for the assessment of impact significance upon cultural heritage, therefore a set of evaluation and assessment criteria have been developed using a



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combination of the Secretary of State's criteria for Scheduling Monuments (Scheduled Monument Statement, Annex 1), Design Manual for Roads and Bridges, Volume 11, Part 3, Section 2, HA 208/07 and Transport Analysis Guidance (TAG Unit 3.3.9, Heritage of Historic Resources Sub-Objective). Professional judgment is used in conjunction with these criteria to undertake the impact assessment. The full assessment methodology can be seen in Appendix C.

### 3.2 Sources Consulted

A study area of 1km radius from grid reference TL 06500 25500 has been examined to assess the nature of the surrounding cultural heritage sites and to place the recorded sites within their context. In addition a number of other sites immediately outside of this area but relevant to the study have been considered.

This study has been undertaken taking into consideration the historical and archaeological background of the proposed development area. The sources consulted were:

- Central Bedfordshire and Luton Historic Environment Record (HER);
- English Heritage and Local Planning Authority for designated sites;
- Historic mapping;
- Aerial photography;
- Bedfordshire and Luton Archives and Records Service; and
- Appropriate documentary sources and archaeological journals.

No site walkover survey was undertaken because of public order issues.

## 4.0 Legislation and Planning Policy Context

### 4.1 Ancient Monuments and Archaeological Areas Act 1979

Scheduled Monuments are designated by the Secretary of State for Culture, Media and Sport on the advice of English Heritage as selective examples of nationally important archaeological remains. Under the terms of Part 1 Section 2 of the Ancient Monuments and Archaeological Areas Act 1979 it is an offence to damage, disturb or alter a Scheduled Monument either above or below ground without first obtaining



permission from the Secretary of State. This Act does not allow for the protection of the setting of Scheduled Monuments.

## **4.2 Planning (Listed Buildings and Conservation Areas) Act 1990**

The Act outlines the provisions for designation, control of works and enforcement measures relating to Listed Buildings and Conservation Areas. Section 66 of the Act states that the planning authority must have special regard to the desirability of preserving the setting of any Listed Building that may be affected by the grant of planning permission. Section 72 states that special attention shall be paid to the desirability of preserving or enhancing the character or appearance of Conservation Areas.

## **4.3 National Planning Policy Framework 2012**

The National Planning Policy Framework (NPPF) sets out the Government's national planning policies including those on the conservation of the historic environment. The NPPF covers all aspects of the historic environment and heritage assets including designated assets (World Heritage Sites, Scheduled Monuments, Listed Buildings, Protected Wreck Sites, Conservation Areas, Registered Parks and Gardens and Registered Battlefields) and non-designated assets. The NPPF draws attention to the benefits that conserving the historic environment can bring to the wider objectives of the NPPF in relation to sustainability, economic benefits and place-making (para 126).

The NPPF states that the significance of heritage assets (including their settings) should be identified, described and the impact of the proposal on the significance of the asset should be assessed. The planning application should include sufficient information to enable the impact of proposals on significance to be assessed and thus where desk-based research is insufficient to assess the interest, field evaluation may also be required. The NPPF identifies that the requirements for assessment and mitigation of impacts on heritage assets should be proportional to their significance and the potential impact (para 128).

The NPPF sets out the approach local authorities should adopt in assessing development proposals within the context of applications for development of both designated and non-designated assets. Great weight should be given to the conservation of designated heritage assets and harm or loss to significance through alteration or destruction should require clear and convincing justification. Substantial harm to or loss of a grade II listed building, park or garden should be exceptional. Substantial harm to or loss of designated heritage assets of the highest significance, notably scheduled monuments, protected wreck sites, battlefields, grade I and II\* listed buildings, grade I and II\* registered parks and gardens, and World





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Heritage Sites, should be wholly exceptional (para 132). Additional guidance is given on the consideration of elements within World Heritage Sites and Conservation Areas (para 138).

Where there is substantial harm to or total loss of significance of a designated heritage asset a number of criteria must be met alongside achieving substantial public benefits (para 133). Where there is less than substantial harm the harm should be weighted against the public benefits of the development (para 134). Balanced judgements should be made when weighing applications that affect non-designated heritage assets (para 134). The NPPF also makes provision to allow enabling development (para 140) and allowing development which enhances World Heritage Sites and Conservation Areas (para 127).

Where loss of significance as a result of development is considered justified, the NPPF includes provision to allow for the recording and advancing understanding of the asset before it is lost in a manner proportionate to the importance and impact. The results of these investigations and the archive should be made publically accessible. The ability to record evidence should not however be a factor in deciding whether loss should be permitted (para 141).

### 4.4 Local Policy and Guidance

The Luton Local Plan (adopted in 2001) contains two policies relevant to the development and heritage:

- ENV6: Archaeology and;
- ENV7: Listed Buildings.

The full text of the relevant policies can be seen in Appendix D. There are additional policies relevant to heritage but not this development including: ENV8 (Development affecting Conservation Areas).

## 5.0 Baseline Data

### 5.1 Designated Sites

There are no World Heritage Sites, Conservation Areas, Registered Parks and Gardens or Registered Battlefields within the study area.

There is one Scheduled Monument, Waulud's Bank, and one Grade II Listed Building, Little Bramingham Farmhouse within the study area. These are detailed in Appendix E and their locations can be seen on



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Figure 2. Waulud's Bank is a Neolithic enclosure approximately 600m to the south of the proposed development and consists of extant earthworks and moderately well preserved sub-surface remains. Little Bramingham Farmhouse is a 17<sup>th</sup> century timber-framed farmhouse with 20<sup>th</sup> century alterations approximately 500m to the east of the proposed development.

### 5.2 Archaeological and Historic Background

The Historic Environment Record holds details for an additional 24 recorded heritage sites within the study area and five archaeological events. Details of the sites can be seen in Appendix E and their locations can be seen on Figure 2. Bracketed numbers within the text refer to the identifier in the Appendix E table and Figure 2.

#### 5.2.1 Prehistoric (up to 43AD)

The earliest evidence for activity in the vicinity of the development site is a find of a possible Mesolithic pick-like tool identified at excavations at Legrave Marsh (Albion Archaeology 2005, p12). The proposed development is located near the Icknield Way, a major routeway from the Neolithic through to Saxon times which had a major influence on settlement within these periods (Albion Archaeology 2005, p6). In addition the Theed Way, another route thought to be of Prehistoric origin runs East-West a little way to the North of the Site (HER 10843).

There are significant Neolithic remains in and around Waulud's Bank (HER 820), including at least one temporary dwelling. It may be seen as part of a wider Neolithic ritual landscape that includes the Icknield Way, Maiden Bower causeway at Dusntable, the Barton Hill Farm Henge at Streatley and a number of long barrows (Dyer 1964 1-15).

The Bronze Age is represented by a late Bronze Age spearhead (HER 14740), found in 1963 at Little Wood, Farley Hill (Albion Archaeology 2005, p12) and pottery fragments found on Spinney Road (HER 14674), as well as some flint artefacts identified at Waulud's Bank.

Waulud's Bank (HER 820) is a large D-shaped enclosure approximately 600m to the south of the proposed development, dating primarily to the Iron Age. Excavations undertaken from the 19<sup>th</sup> century onwards have identified remains dating from the Neolithic through to the Roman and medieval periods, indicating that this site was a focus of settlement activity for a prolonged period. A possible long barrow is noted here by the HER, although this identification is uncertain (HER 797). Although originally identified as defensive (VCH



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1904: 42, 268-9), 20<sup>th</sup> century investigations have indicated not only settlement, but also ceremonial and ritual aspects connected to the source of the River Lea at the site (RCHME 1994).

Later Prehistoric activity close to the study area is demonstrated by Dray's Ditches (HER 113), a linear earthwork that cuts across the gap between the Streatley Ridge and the Galley and the Warden Hills. In doing so it cuts both the Theed Way and the Icknield Way, both of which are known to have been long distance trade routes at this time. As such, Dray's Ditches may represent an Iron Age territorial or tribal boundary. The ditches seem to have retained some importance into the Roman period as antiquarians recorded a number of Romano-British cremations here during the construction of the New Bedford Road in 1830 (Ibid).

### **5.2.2 Roman/Romano British (43AD to c.450AD)**

Pottery, animal bone and pieces of baked clay were found at the supposed site of a Roman kiln near Waulud's Bank and a possible Roman house was discovered nearby at Bramingham Road, including a possible mosaic. An archaeological evaluation identified evidence of Romano-British settlement, including structural features near to the River Lea in 1991 (HER 15817).

In addition to the Roman remains at Waulud's Bank noted above, Roman settlement has been identified at Limbury (HER115) and has produced significant evidence of settlement continuing from the later Iron Age into the 2<sup>nd</sup> Century. Several other settlement sites are suspected at Waller Street, Round Green and Grange Farm, Biscot. At the corner of Park Street and Seymour Road, a Romano-British rubbish pit or shallow ditch suggests the presence of a substantial Romano-British building in this area (Albion Archaeology 2005, p14).

Further Roman settlement activity is indicated by a potential Roman road (HER 2836), coins and domestic items (HER 15850) around Sundon Park, approximately 600m to the west of the proposed development. The burials noted above at Dray's Ditches (HER 113) indicate further Roman period activity, but also a continuity in landuse, population and probably belief, albeit with Roman accretions, from the later Iron Age.

### **5.2.3 Early Medieval (450AD to 1066AD)**

Early medieval activity in Luton is thought to centre on Limbury, south of Waulud's Bank, extending south east towards the core of modern Luton (Albion Archaeology 2005, p15), dating from the 5<sup>th</sup> through 8<sup>th</sup> centuries, joined by a series of dispersed hamlets around the areas of Biscot, Leagrave, Hyde, Stapleford and Brache. The Saxon settlement at "Lyg-tun" or Luton was established by the 10<sup>th</sup> century, when the



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original church was built (Albion Archaeology 2005, p16). The place name Luton means “settlement or farm on the river Lea” (Mills 2011: 310).

Under the terms of the ‘Danelaw’ treaty in AD878, Luton found itself right on the boundary between the two parts of the divided England. The Anglo-Saxon Chronicle states that Luton was reclaimed from the Danes in AD917, by Edward the Elder (VCH 1904: 42, Albion Archaeology 2005, p16). Although several antiquarian authorities (e.g. Wadmore, 1920: 35-7) suggest that Waulud’s Bank may have been fortified, or at least occupied at this time, none of the excavations undertaken have recovered early medieval material to support the theory.

Within the study area, Theedway or Ede Way is noted by the HER (HER 10843). This routeway is believed to be Prehistoric in origin, but is known to have existed as a salt way in the early medieval and medieval periods.

### **5.2.4 Medieval Period (1066AD-c.1540AD)**

By the time of the Domesday survey, Luton manor is listed as being among the king’s lands, and it had been in the hands of the Crown since the reign of Edward the Confessor, within the Flitt Hundred (Albion Archaeology 2005, p9).

Remains of medieval ridge and furrow earthworks at Waulud’s Bank suggest that the study area was given over to agricultural land in this period. Field names noted on the tithe map of 1842 indicate the possible locations of a moated site (HER 3450), a medieval hospital (HER 12361) and a manorial site at Limbury.

### **5.2.5 Post-Medieval Period (c.1540AD to 1900AD) and Modern (1900AD to present)**

Luton became a substantial settlement during the 17<sup>th</sup> century, with the arrival of the hat and plait, or woven straw crafts. These became industries and grew substantially into the 19<sup>th</sup> century, driving population growth. Other important crafts in the post-medieval period included brewing and brick making. Into the 20<sup>th</sup> century, engineering industries became more important to the town, leading to extensive bomb damage during the Second World War (Albion Archaeology 2005, p11).

Within the study area, Post medieval remains are characterised by cropmarks and earthworks representing former field boundaries noted on the 1842 Tithe map (HER 12411, 12412, 12413, 170).

Little Bramingham Farmhouse (HER 5968) is a Grade II listed building, dating to the 17<sup>th</sup> century. The site is visually separated from the proposed development by housing. The presence of the farmhouse reinforces the interpretation



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that this area was agricultural land from at least the post-medieval period onwards. Holy Cross Church (HER 13546), built in 1976, occupied a large proportion of the proposed development site until its demolition.

There are several sites within the study area of unknown date. These consist of two woodlands (HER 13162 and 13163) and nearby enclosure cropmarks (HER 16651) and a probable quarry (HER 12410). Two other sites record the presence of undated human remains (HER 2838 and 2839).

### 6.0 Historic Mapping Survey

A selection of historic maps is presented in Appendix F, including early Ordnance Survey maps, the 1842 Tithe Map and a number of early 19<sup>th</sup> century estate plans that predate the Tithe survey.

The earliest mapping examined for the site was 1810, depicting land to be sold from the estates of Sir Edmund Filmer (BRO/323) which showed the proposed development site, as did a second document in the same bundle circa 1820. Neither plan showed any features of note on the Site but recorded its field names as "West Fields", with Waulud's given as "Wallards", and showed them both as arable. Great Bramingham Wood was not depicted, as it was in separate ownership, but the sinuous field boundary now fossilised as the northern part of the modern Waulud's Bank Drive was shown. Unfortunately no Inclosure map was available at the Bedfordshire Archives but the Filmer plans indicate a pre-1800 date for the field boundaries depicted by the Ordnance Survey.

The 1842 Tithe Map for Luton Parish (MAT 30/1/2) showed Great Bramingham Wood within its current boundaries and the Site subdivided into a number of fields and closes. A copy of the Ordnance Survey Second Edition 6" map included annotations taken from the Tithe Map and Inclosure Award giving field names. These names are purely descriptive, including "Long Field" and "Three Acres" and "Penhill West Field"; Pen may be of Celtic derivation meaning end, top or head, or could be the owner's name (Mills 2010: 364-66).

The Ordnance Survey 1<sup>st</sup> Edition 25" (Sheet XXIX.12) was published in 1880 and showed the Site was agricultural land bounded to the West by a track that becomes part of what became Waulud's Bank Drive during the establishment of the Marsh Farm estate, and the to the East by a sinuous lane now fossilised as Northwell Drive. The landform remained the same through the OS Second Edition (1901), with some minor subdivision of fields to the West of the Site, the Third Edition (1926) and the Revised Third Edition (1938). The 1895 6" Ordnance Survey map formed the base for a map of the Luton (Rural) Parish Order (MCDP4) but again the field pattern remained constant and no features are described. The 1938 map includes two



small, faint, rectangular pencil annotations but they have no legend and appear to be accidental. The Site also survives the Second World War without apparent change, as the 1947 1:10,560 aerial photographs held in the Bedfordshire and Luton HER also show no change to the field pattern and no temporary development, such as military camps. In addition the aerial photographs show no visible crop or soil marks. By the time of the 1969 aerial photo survey (HSL UK BED 8/4/69 Run 9 7389/90 and Run 10 7832) the site was still in agricultural use but by 1976 the Marsh Farm estate had been constructed and although Great Bramingham Wood survived, the site has been thoroughly obscured by development (HSL 76 24 24/6/76 Run 11 0981).

## 7.0 Site Walkover Survey

A site walkover survey was undertaken at Waulud's Bank on Friday 7<sup>th</sup> June 2013 to undertake an assessment of any impact of the proposed development on setting. The weather was bright and dry. Photographs of the site can be seen in Appendix B. HER 797, the supposed Long Barrow was also visited but no trace of it could be seen. The Site itself was not visited on foot but development and landscape are considered likely to have obscured any pre-existing features. The developed urban character of the area was noted.

Waulud's Bank is in good condition, perhaps in spite of its urban fringe location. Nevertheless, comments made by Mr Coleman at the Bedfordshire and Luton HER indicate that there is a good deal of local pride surrounding the monument. Currently, the setting of the monument is only impacted by development as one looks north toward Marsh Farm, due to extensive planting, including some mature trees. The nearby tower blocks have limited impact but do not significantly affect the understanding, appreciation or significance of the site, particularly since the view southwards across the site from the source of the River Lea does not include the developed area.

## 8.0 Heritage Potential and Impact Assessment

There are no recorded heritage assets within the proposed development area. However, evidence suggests that the Site still retains potential for some surviving remains, including the presence of Romano-British settlement and burials along the Icknield Way to the East of the Site, as well as the anecdotal account of the discoveries of "pottery and bone" during the construction of Marsh Farm (Simco, 1984: 110). Two factors may be regarded as important here: the higher ground is associated with both settlement and travel prior to the draining and management of low-lying, waterlogged areas, while the site at Waulud's Bank,



reached by passing close to the Site, has provided a focus for ritual activity from the Neolithic period onwards.

It could be argued that the reference to the discovery of “pottery and bone” (Ibid) indicate that the previous development and, potentially, demolition works have effectively removed any archaeological deposits present within the proposed development area. However, without formal confirmation of this it is impossible to say that remains are no longer present with any certainty. It is the view of Mr Martin Oake, Archaeologist for Central Bedfordshire, that this uncertainty mean that further works are likely to be required to assess the presence or absence of further remains, in line with NPPF. Indeed, it is entirely possible that, while remains directly affected by construction will have been removed, archaeological deposits may well survive between the footprints of the buildings. The previous discoveries strongly suggest that there is moderate to high potential for archaeological deposits to be present though previous development may have had a major impact on them.

Although Waulud’s Bank is of High significance by virtue of its Scheduled status, the proposed development is some distance away from the monument. In addition, both the trees and the development found between the Site and the Scheduled Monument mean that they are not intervisible. The impact is therefore of Negligible impact and Neutral effect. The listed Little Bramingham Farm is also designated so of High significance. Like Waulud’s Bank it is separated from the proposed development by other, later buildings, again meaning that the proposed development has Negligible impact and Neutral effect on this designated asset.

## 9.0 Proposed Evaluation and Mitigation Measures

Martin Oake, Archaeologist for Central Bedfordshire indicated during a consultation meeting on 7<sup>th</sup> June 2013 that the HER reference to remains coming from the site and the evidence for significant levels of later Prehistoric and Romano-British activity in the study area meant that he considered there was still potential for archaeological deposits to be present at the Site. His opinion is that unless remains can be shown to not be present, whether through the impact of previous development or other agency, then further works will be required to confirm or disprove the presence of archaeological deposits within the proposed development area. In consequence of this it is recommended that a scheme of field evaluation is devised in line with Institute for Archaeologists Standard and Guidance for Field Evaluation (IFA 2008).



## 10.0 Residual Effects and Conclusions

The results of this assessment indicate that the area around the Site is rich in archaeological monuments and deposits, particularly of later Prehistoric and Romano-British origin. It is not currently possible to say for certain that the Site includes any archaeological remains but there is circumstantial evidence that material was found during the construction of the previous development on the Site. Further evaluation will be required to assess this evidence, as well as the effect that previous development has had on any remains.

The proposed development is likely to have a significant adverse impact on any remains present. However, until the presence of archaeological deposits is proven this cannot be confirmed. In the event that remains are identified, their further investigation ahead of development will increase the knowledge base for the human past of the region. In addition, there may be opportunity to enhance public understanding and appreciation of the heritage of the area through public information, outreach and presentation relating to any discoveries.





## References

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Simco, A. (1984) Survey of Bedfordshire: Roman Period.

Victoria County History (1904) Bedfordshire, I.

Wadmore, B. (1920) Earthworks of Bedfordshire.

### **Historic Mapping & Archives**

Ordnance Survey 25" Sheet xxix.12, First Edition 1880

Ordnance Survey 25" Sheet xxix.12, Second Edition 1901

Ordnance Survey 25" Sheet xxix.12, Third Edition 1926

Ordnance Survey 25" Sheet xxix.12 Revised Third Edition 1938

Ordnance Survey 6" Sheet xxix.12 NE Second Edition 1892

323 (uncatalogued MSS) Estates of Sir Edmund Filmer Bart.



## Marsh Farm Regeneration

(c.1820) Marsh Farm plan

(1810) General Plan of land to be sold.

MAT 30/1/2 (1842) Tithe of Luton Parish

BH 469 (1887) Plan of the Marsh Farm Leagrave, showing the cultivation of the land, December 1887

MCDP 4 (1895) Map showing the boundaries of the parishes of Leagrave, Limbury, Stopsley and Hyde: The Luton (Rural) Division of Parish Order

MC1/3/3/14-17 (c 1892) Second Edition OS 6" annotated to show field names from Inclosure Awards and Tithe

### **Aerial Photographs**

RAF 1947 1:10560 Central Beds HER: TL02

HSL UK BED 8/4/69 Run 9 7389/90

HSL UK BED 8/4/69 Run 10 7832

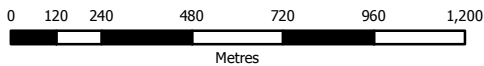
HSL 76 24 24/6/76 Run 11 0981



# Appendices



## **Appendix A – Site Location Plan**



Arndale Court  
 Headingley  
 Leeds  
 LS6 2UJ  
 TEL: +44 (0)113 2787111  
 FAX: +44 (0)113 2750623  
 e-mail: enviro@wyg.com



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Sheet Size: **A4** Scale of Original: **1:20,000**

Client: **Luton Borough Council**

Project: **Mixed Use Development at Marsh Farm**

<b>PMC</b> Created:	<b>MB</b> Checked:	<b>June 2013</b> Date:	<b>V1</b> Version:
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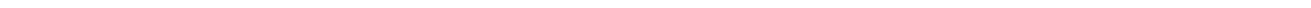
Title:

**Site Location Plan**

Office: <b>4154</b>	Project No: <b>A082192</b>	Figure No: <b>1</b>
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## **Appendix B – Site Photographs**





**Photograph 1: Waulud's Bank, looking south-east from the source of the river Lea**



**Photograph 2: Waulud's Bank, looking south-west from the source of the river Lea**





## **Appendix C – Assessment Methodology**



### Cultural Heritage Impact Assessment Methodology

No standard method of evaluation and assessment is provided for the assessment of significance of effects upon cultural heritage, therefore a set of evaluation and assessment criteria have been developed using a combination of the Secretary of State’s criteria for Scheduling Monuments (Scheduled Monument Statement, Annex 1), Design Manual for Roads and Bridges, Volume 11, Part 3, Section 2, HA 208/07 and Transport Analysis Guidance (TAG Unit 3.3.9, Heritage of Historic Resources Sub-Objective). Professional judgement is used in conjunction with these criteria to undertake the impact assessment.

### Value

The table below provides guidance on the assessment of cultural heritage value on all archaeological sites and monuments, historic buildings, historic landscapes and other types of historical site such as battlefields, parks and gardens, not just those that are statutorily designated.

Value	Examples
Very High	World Heritage Sites, Scheduled Monuments of exceptional quality, or assets of acknowledged international importance or can contribute to international research objectives Grade I Listed Buildings and built heritage of exceptional quality Grade I Registered Parks and Gardens and historic landscapes and townscapes of international sensitivity, or extremely well preserved historic landscapes and townscapes with exceptional coherence, integrity, time-depth, or other critical factor(s)
High	Scheduled Monuments, or assets of national quality and importance or than can contribute to national research objectives Grade II* and Grade II Listed Buildings, Conservation Areas with very strong character and integrity, other built heritage that can be shown to have exceptional qualities in their fabric or historical association. Grade II* and II Registered Parks and Gardens, Registered Battlefields and historic landscapes and townscapes of outstanding interest, quality and importance, or well preserved and exhibiting considerable coherence, integrity time-depth or other critical factor(s)
Medium	Designated or undesignated assets of regional quality and importance that contribute to regional research objectives Locally Listed Buildings, other Conservation Areas, historic buildings that can be shown to have good qualities in their fabric or historical association Designated or undesignated special historic landscapes and townscapes with



Value	Examples
	reasonable coherence, integrity, time-depth or other critical factor(s) Assets that form an important resource within the community, for educational or recreational purposes.
Low	Undesignated assets of local importance Assets compromised by poor preservation and/or poor survival of contextual associations but with potential to contribute to local research objectives. Historic (unlisted) buildings of modest quality in their fabric or historical association Historic landscapes and townscapes with limited sensitivity or whose sensitivity is limited by poor preservation, historic integrity and/or poor survival of contextual associations. Assets that form a resource within the community with occasional utilisation for educational or recreational purposes.
Negligible	Assets with very little or no surviving cultural heritage interest. Buildings of no architectural or historical note. Landscapes and townscapes that are badly fragmented and the contextual associations are severely compromised or have little or no historical interest.

**Magnitude**

The magnitude of the potential impact is assessed for each site or feature independently of its archaeological or historical value. Magnitude is determined by considering the predicted deviation from baseline conditions. The magnitude of impact categories are adapted from the Transport Assessment Guidance (TAG Unit 3.3.9) and Design Manual for Roads and Bridges, Volume 11, Part 3, Section 2, HA 208/07.

Magnitude of Impact	Typical Criteria Descriptors
Substantial	Impacts will damage or destroy cultural heritage assets; result in the loss of the asset and/or quality and integrity; cause severe damage to key characteristic features or elements; almost complete loss of setting and/or context of the asset. The assets integrity or setting is almost wholly destroyed or is severely compromised, such that the resource can no longer be appreciated or understood. (Negative) The proposals would remove or successfully mitigate existing damaging and discordant impacts on assets; allow for the restoration or enhancement of characteristic features; allow the substantial re-establishment of the integrity, understanding and setting for an area or group of features; halt rapid degradation



Magnitude of Impact	Typical Criteria Descriptors
	and/or erosion of the heritage resource, safeguarding substantial elements of the heritage resource. (Positive)
Moderate	Substantial impact on the asset, but only partially affecting the integrity; partial loss of, or damage to, key characteristics, features or elements; substantially intrusive into the setting and/or would adversely impact upon the context of the asset; loss of the asset for community appreciation. The assets integrity or setting is damaged but not destroyed so understanding and appreciation is compromised. (Negative) Benefit to, or restoration of, key characteristics, features or elements; improvement of asset quality; degradation of the asset would be halted; the setting and/or context of the asset would be enhanced and understanding and appreciation is substantially improved; the asset would be bought into community use. (Positive)
Slight	Some measurable change in assets quality or vulnerability; minor loss of or alteration to, one (or maybe more) key characteristics, features or elements; change to the setting would not be overly intrusive or overly diminish the context; community use or understanding would be reduced. The assets integrity or setting is damaged but understanding and appreciation would only be diminished not compromised. (Negative) Minor benefit to, or partial restoration of, one (maybe more) key characteristics, features or elements; some beneficial impact on asset or a stabilisation of negative impacts; slight improvements to the context or setting of the site; community use or understanding and appreciation would be enhanced. (Positive)
Negligible / No Change	Very minor loss or detrimental alteration to one or more characteristics, features or elements. Minor changes to the setting or context of the site. No discernible change in baseline conditions (Negative). Very minor benefit to or positive addition of one or more characteristics, features or elements. Minor changes to the setting or context of the site No discernible change in baseline conditions. (Positive).

Magnitude (scale of change) is determined by considering the predicted deviation from baseline conditions. Quantifiable assessment of magnitude has been undertaken where possible. In cases where only qualitative assessment is possible, magnitude has been defined as fully as possible.

During the assessment any embedded mitigation has been considered in the impact assessment and this is clearly described in this section (cross referring the development description). Therefore, the magnitude of the impacts described herein will be stated before and after additional mitigation has been taken into consideration.



# Marsh Farm Regeneration

Impacts may be of the following nature and will be identified as such where relevant:

- Negative or Positive.
- Direct or indirect.
- Temporary or permanent.
- Short, medium or long term.
- Reversible or irreversible.
- Cumulative.

## Significance

By combining the value of the cultural heritage resource with the predicted magnitude of impact, the significance of the effect can be determined. This is undertaken following the table below. The significance of effects can be beneficial or adverse.

Significance of Effects	Magnitude of Impact			
	Substantial	Moderate	Slight	Negligible / no Change
Very High	Major	Major – Intermediate	Intermediate	Minor
High	Major – Intermediate	Intermediate	Intermediate – Minor	Neutral
Medium	Intermediate	Intermediate – Minor	Minor	Neutral
Low	Intermediate – Minor	Minor	Minor – Neutral	Neutral
Negligible	Minor-Neutral	Minor-Neutral	Neutral	Neutral

Significance should always be qualified as in certain cases an effect of minor significance could be considered to be of great importance by local residents and deserves further consideration. The significance of effect is considered both before and after additional mitigation measures proposed have been taken into account.

Effects of intermediate significance or greater are considered to be significant effects within the context of planning policy and Environmental Impact Assessment.



## **Appendix D – Planning Policies**



**Luton Borough Local Plan – Adopted 2001**

Policy ENV6 Archaeology

Planning permission will not be granted for development that would adversely affect sites of archaeological interest and their settings, whether scheduled or not. The Borough Council will also require:

- A. the results of an archaeological evaluation to be submitted as part of any application; and
- B. the preservation in situ, and provision for appropriate management, of those remains and their settings considered to be of particular importance; and
- C. provision for recording and/or excavation by an accredited organisation prior to the commencement of development where in situ preservation is not justified.

Policy ENV7 Listed Buildings

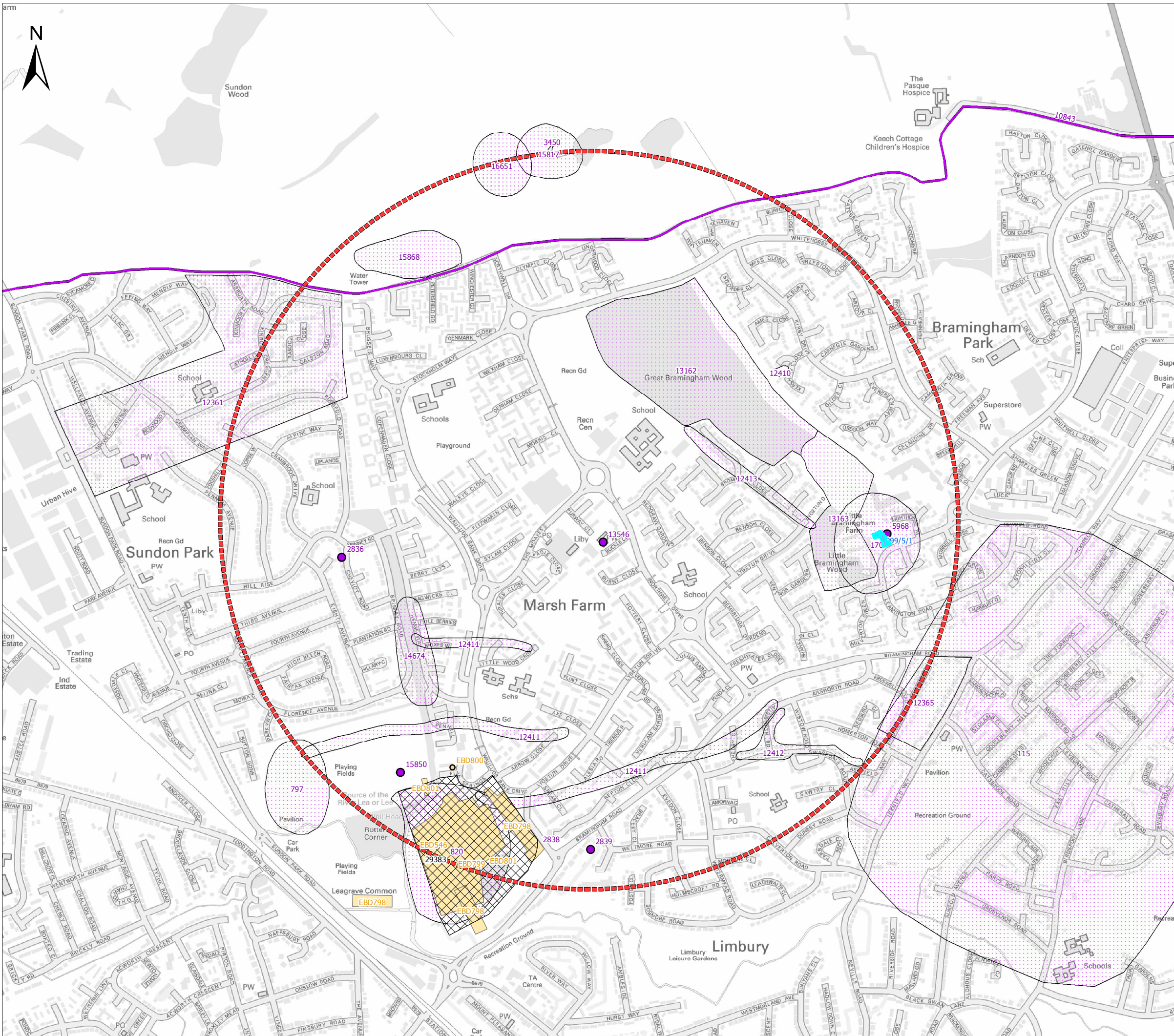
When considering proposals affecting a Listed Building:

- A. consent will not be given for the complete or partial demolition of a listed building, unless it can be shown that there are very special circumstances as to why the building cannot be retained and returned to an appropriate use;
- B. consent will not be given for any extensions or alterations to the interior or exterior of a listed building, which are likely to detract from its historic interest or architectural character and appearance;
- C. planning permission for the change of use of a listed building will only be granted where the proposal:
  - i. would not harm the character or setting of the building; and
  - ii. would contribute to the continued preservation of the building or its restoration;
- D. planning permission will not be granted for development, which is likely to adversely affect the setting of a listed building. removed or damaged and, where appropriate, are incorporated within the internal layout of the building.



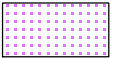





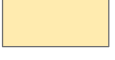


## **Appendix E – Recorded Heritage Sites**





**Legend**

-  Site Boundary
-  Study Area
-  MarshFmLutonHERMons\_region
-  MarshFmLutonHERMons\_polyline
-  MarshFmLutonHERMons\_point
-  Listed Building
-  MarshFmLutonHERSchedMon\_region
-  MarshFmLutonHEREvents\_point
-  MarshFmLutonHEREvents\_region


0 65 130 260 390 520 650  
Metres

<b>PMC</b> Created:	<b>MB</b> Checked:	<b>April 2013</b> Date:	<b>V1</b> Version:
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Arndale Court  
Headingley  
Leeds  
LS6 2UJ

TEL: +44 (0)113 2787111  
FAX: +44 (0)113 2750623  
e-mail: enviro@wyg.com



Sheet Size: **A3** Scale of Original: **1:10,000**

Client: **Summerfield Developments Ltd**

Project: **Taunton Road, Wellington Somerset**

Title: **Recorded Heritage Sites**

Office: <b>4154</b>	Project No: <b>A081504</b>	Figure No: <b>2</b>
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**Recorded Heritage Sites (Luton and Central Bedfordshire Historic Environment Record)**

Identifier	Grid Reference	Period	Description	Grade
29383; 820	TL 0617 2459	Neolithic - Roman	Neolithic enclosure known as Waulud's Bank. Surviving earthworks define a large D-shaped enclosure. Some earthworks survive up to 1m in height and there is a largely infilled external ditch 15-20m across. Limited excavations have recorded Neolithic and Bronze Age flints and pottery. Later Iron Age and Roman material has also been recorded in the ditches indicating re-use of the monument.	Scheduled Monument
999/5/1; 5968	TL 0729 2544	Post-Medieval	Little Bramingham Farmhouse. A 17th century timber framed L-plan farmhouse. Considerably altered, extended and re-fronted but in a sympathetic timber framed style. Tiled roof and casement windows.	Listed Building Grade II
2836	TL 0583 2540	?Roman	A possible Roman road in Sundon Park based on two parallel ditch sections observed in 1952 water pipe trenches.	
15850	TL 0598 2481	Roman	A Roman coin of Antoninanus of Carausius (287-293AD) from the Camulodunum mint found at Sundon Park recreation ground near Waulud's Bank.	
2838	TL 0636 2461	Unknown	Findspot of human skeletons recorded by Worthington G Smith and identified on OS mapping.	
2839	TL 0650 2460	Unknown	Inhumation found at Bramingham Road with no grave foods or other finds.	
13546	TL 06538 25440	Modern	Holy Cross Church at Marsh Farm was opened in December 1976, dedicated in Sept 1977 and consecrated June 1983.	



Identifier	Grid Reference	Period	Description	Grade
15868	TL 060 262	Roman	Finds from around the water tower at Sundon include a barbed and tanged arrowhead of a probable Bronze Age date, Iron Age and Roman pottery, Roman coins a key handle, an awl tracer and a sherd of medieval pottery.	
3450	TL 063 265	?Medieval	A possible moated site.	
13162	TL 068 258	Unknown	Great Bramingham Wood is an ancient woodland consisting of old coppice with ash, hazel and field maple under oak standards.	
13163	TL 071 255	Unknown	Little Bramingham Wood is an ancient woodland.	
15817	TL 063 264	Iron Age / Roman	To the west of Bramingham Farm a field walking survey on the 1990s collected evidence for Iron Age and Roman occupation. Flint gritted pottery of early Iron Age date associated with scatters of burnt flints. Late pre-Roman Iron Age and early Roman pottery were also recovered. This may have been one of several farmsteads along the ridge top or one in a shifting settlement pattern.	
16651	TL 062 264	Prehistoric	Two conjoined curvilinear enclosure cropmarks located at the head of a dry valley running off to the NE.	
12361	TL 0544 2586	Medieval	Historic field name of Spittal Hill suggests the site of a medieval hospital lies in the vicinity.	
14674	TL 0603 2514	Bronze Age	Bronze Age collared urn fragments were found during the digging of house foundations in Spinney Road.	
12413	TL 0693 2561	Post-Medieval	Linear cropmarks west of Little Bramingham Wood. The main linear feature is the alignment of a post-medieval field boundary shown on the tithe map.	



Identifier	Grid Reference	Period	Description	Grade
170	TL 0727 2543	Medieval / Post-Medieval	Linear earthwork, Little Bramingham Farm. A reference in the early 19th century to a "square entrenchment" in the garden of a farm house but identified to be part of the former south-eastern boundary of Little Bramingham Wood.	
12410	TL 0701 2590	Unknown	Ploughed down earthworks of a small hollow, east of Great Bramingham Wood. A probable former quarry pit.	
797	TL 0570 2477	?Neolithic	Site of a possible long barrow at Waulud's Bank, however this identification is uncertain. Now a recreation ground but formerly a ploughed field.	
12411	TL 0636 2495	Medieval / Post-Medieval	Ploughed down earthworks of three linear features shown on 1940s aerial photographs. These are probably remnants of pre-enclosure common fields which have now been largely destroyed and built over.	
12412	TL 0698 2491	Unknown	Several linear earthworks visible in meadow land adjoining a stream on 1940s aerial photographs. This area has now been developed and built over.	
12365	TL 0740 2500	Neolithic / Medieval	Bury Hill, an historic field name which is usually indicative of a medieval manorial site. It is also the location of finds of polished flint axes, arrowheads etc.	



Identifier	Grid Reference	Period	Description	Grade
115	TL 0775 2485	Roman	Roman settlement centred around a villa, Limbury/Biscot. An extensive area of Roman activity related to material found at Biscot gravel pit, Stoney Hill and Gooseberry Hill. In 1928 part of a substantial building was found during building work with a possible mosaic. During building work in the 1950s in the Runfold Avenue and Wodecroft Road areas remains of a settlement along the Ickniel Way were identified. Settlement dated to the 3rd to 4th centuries on coin and pottery evidence but late Iron Age coins and 1st-2nd century Samian ware may indicate earlier occupation.	
10843	-	Neolithic to Post-Medieval	Thiodweg (Theedway or Ede Way). An ancient routeway first recorded in AD926 but probably prehistoric in origin and a salt way in Saxon and medieval periods. Alignment survives as tracks, footpaths and field boundaries for most of its length across the county but rarely follows modern roads.	
EBD799	TL 0613 2459	Prehistoric	Waulud's Bank, A prehistoric Enclosure at Luton; An analytical earthwork survey completed of the monument.	
EBD800	TL 0613 2483	N/A	Waulud's Bank, Leagrave; Watching Brief on the construction of sewage trenches that did not identify any archaeological remains.	
EBD546	TL 0614 2459	N/A	Waulud's Bank; Geophysical Survey. A number of anomalies were recorded including potential field ditches and a possible D-shaped enclosure.	
EBD798	TL 0611 2457	N/A	Waulud's Bank, Luton; Geophysical Survey. Slight evidence for archaeological features located on the eastern margin of the site, although there was quite a lot of interference.	

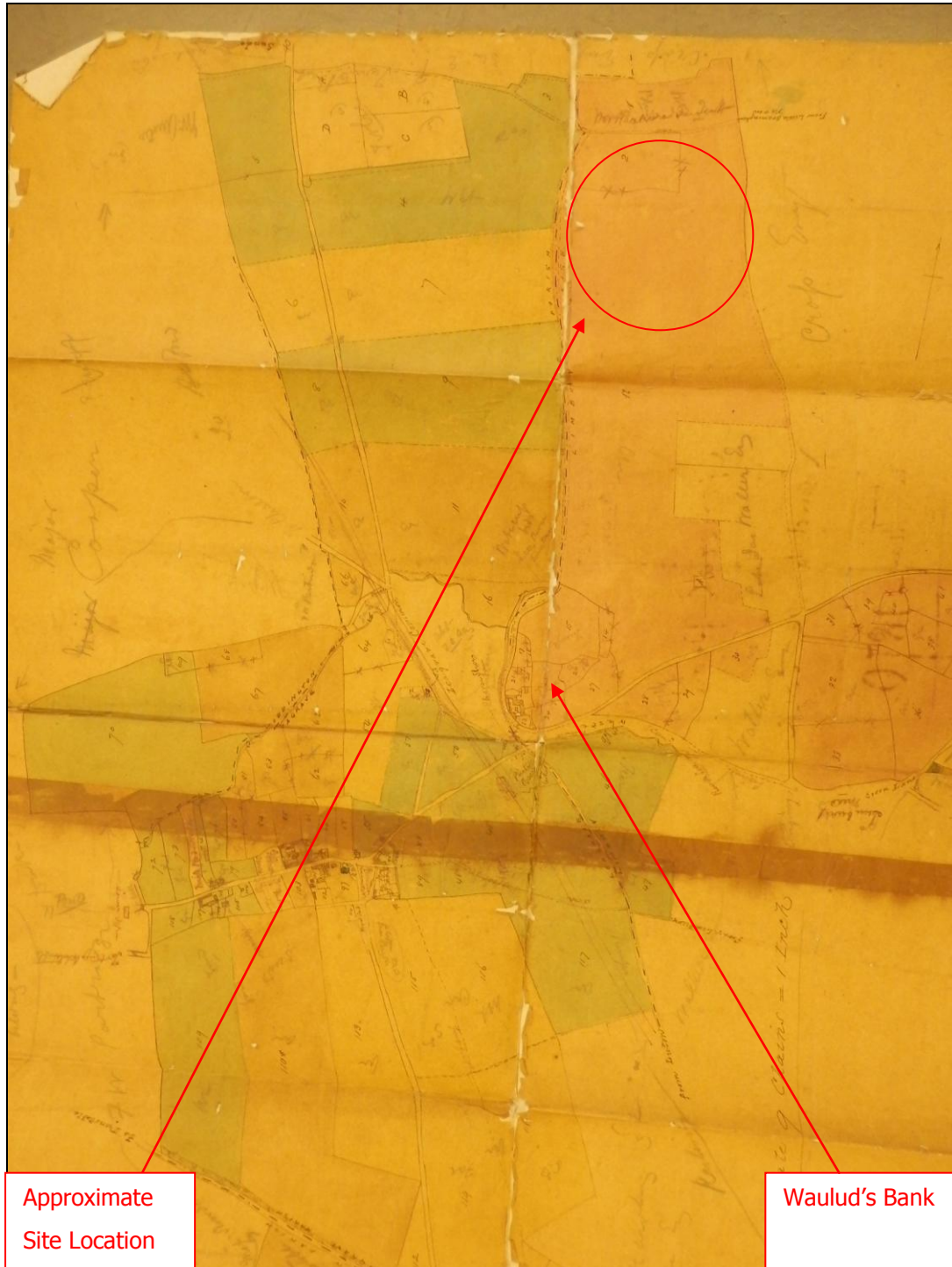
# Marsh Farm Regeneration



Identifier	Grid Reference	Period	Description	Grade
EBD801	TL 0616 2468	Neolithic	A Secondary Neolithic Camp at Waulud's Bank. Two trenches cut and right angles across the bank and ditch. Identified a Neolithic hut, lithics and pottery as well as evidence for the sequence of fills in the ditches.	



## **Appendix F – Historic Mapping**



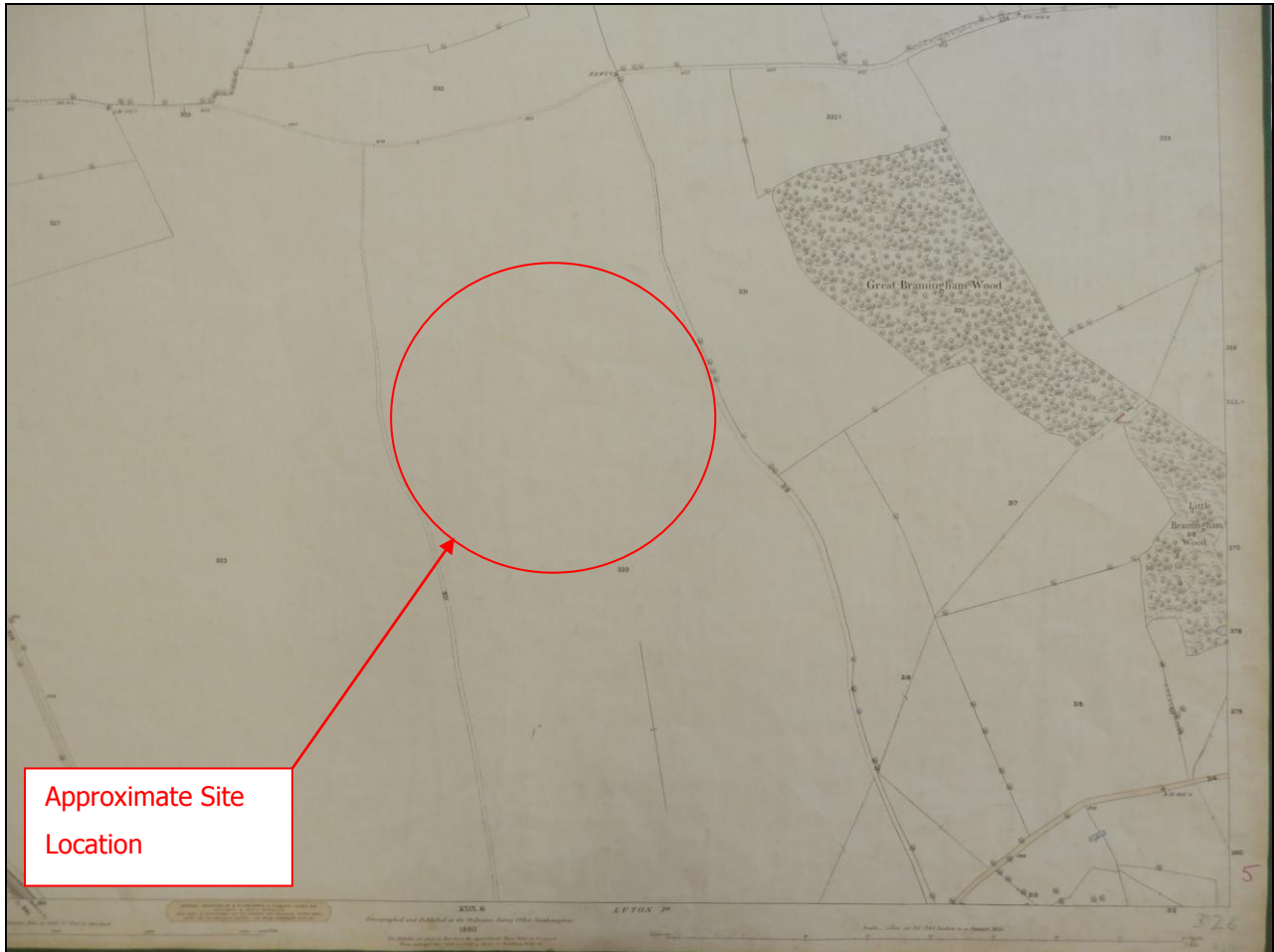
**Sir Edmund Filmer Papers: Map of Land to be Sold, 1810**

(Not to scale)



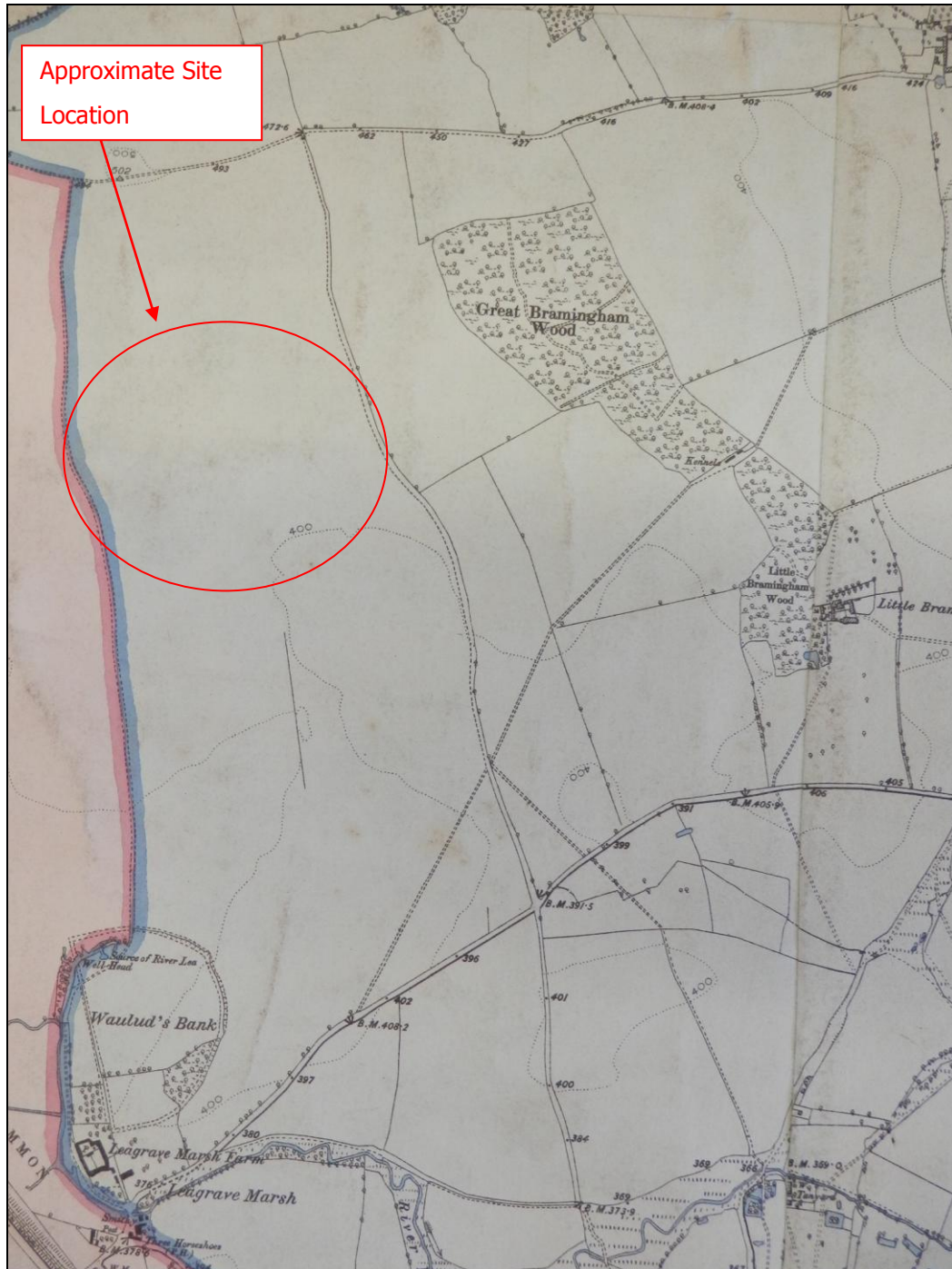


**Title Map of Luton Parish (1842)**



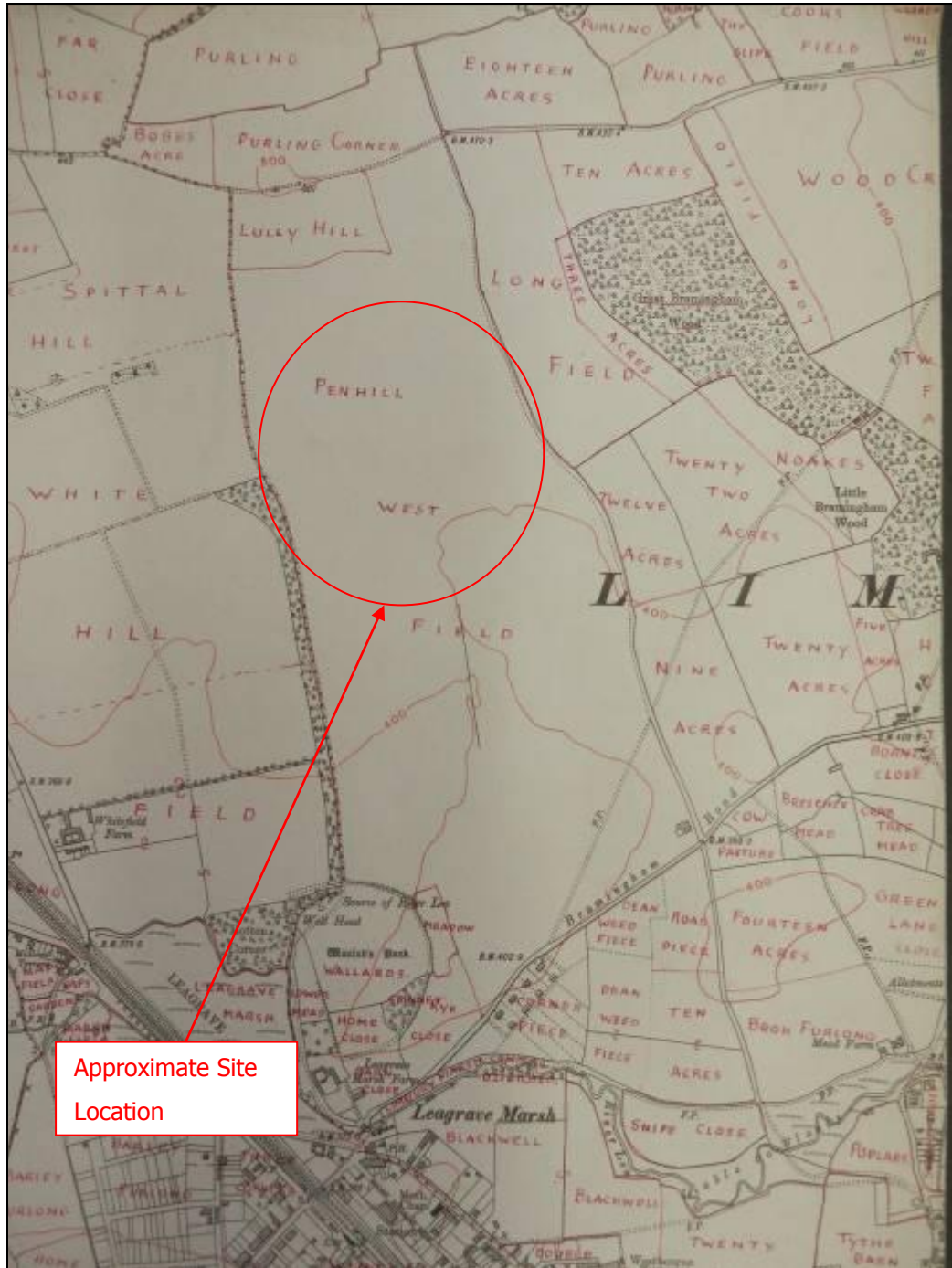
**Ordnance Survey First Edition Map, 1880**

(Not to scale)



**MCDP 4 (1895) Map showing the boundaries of the parishes of Leagrave, Limbury, Stopsley and Hyde: The Luton (Rural) Division of Parish Order, 1895**

(Not to scale)



Ordnance Survey Second Edition Map, 1901, with annotated fieldnames from the 1842 Tithe.

(Not to scale)



**Ordnance Survey Revised Third Edition Map, 1938**

(Not to scale)



## **Appendix G – Report Conditions**



**Archaeology and Heritage Desk-Based Assessment, Marsh Farm Regeneration Area, Luton**

This report is produced solely for the benefit of **Luton Borough Council** and no liability is accepted for any reliance placed on it by any other party unless specifically agreed by us in writing.

This report is prepared for the proposed uses stated in the report and should not be relied upon for other purposes unless specifically agreed by us in writing. In time technological advances, improved practices, fresh information or amended legislation may necessitate a re-assessment. Opinions and information provided in this report are on the basis of WYG using reasonable skill and care in the preparation of the report.

This report refers, within the limitations stated, to the environment of the site in the context of the surrounding area at the time of the inspections. Environmental conditions can vary and no warranty is given as to the possibility of changes in the environment of the site and surrounding area at differing times.

This report is limited to those aspects reported on, within the scope and limits agreed with the client under our appointment. It is necessarily restricted and no liability is accepted for any other aspect. It is based on the information sources indicated in the report. Some of the opinions are based on unconfirmed data and information and are presented accordingly within the scope for this report.

Reliance has been placed on the documents and information supplied to WYG by others, no independent verification of these has been made by WYG and no warranty is given on them. No liability is accepted or warranty given in relation to the performance, reliability, standing etc of any products, services, organisations or companies referred to in this report.

Whilst reasonable skill and care have been used, no investigative method can eliminate the possibility of obtaining partially imprecise, incomplete or not fully representative information. Any monitoring or survey work undertaken as part of the commission will have been subject to limitations, including for example timescale, seasonal, budget and weather related conditions.

Although care is taken to select monitoring and survey periods that are typical of the environmental conditions being measured, within the overall reporting programme constraints, measured conditions may not be fully representative of the actual conditions. Any predictive or modelling work, undertaken as part of the commission will be subject to limitations including the representativeness of data used by the model and the assumptions inherent within the approach used. Actual environmental conditions are typically more complex and variable than the investigative, predictive and modelling approaches indicate in practice, and the output of such approaches cannot be relied upon as a comprehensive or accurate indicator of future conditions.

The potential influence of our assessment and report on other aspects of any development or future planning requires evaluation by other involved parties.

The performance of environmental protection measures and of buildings and other structures in relation to acoustics, vibration, noise mitigation and other environmental issues is influenced to a large extent by the degree to which the relevant environmental considerations are incorporated into the final design and specifications and the quality of workmanship and compliance with the specifications on site during construction. WYG accept no liability for issues with performance arising from such factors.

8 November 2012  
WYG Environment Planning Transport Ltd