

# Former Union Cinema, Gordon Street, Luton, LU1 2QP

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### Non-Technical Summary

In October 2016, Heritage Planning Services Ltd was commissioned by GPS Estates Ltd (the client) via Michael Hardiman & Associates LLP (the agent) to prepare a heritage statement for the former Union Cinema, Gordon Street, Luton, LU1 2QP (hereafter referred to as the Project Site). Permission is being sought for a large scale residential scheme involving the retention of the majority of the façade to the existing building and the erection of a new building behind and to the northern end.

The Project Site comprises the former 1930s Art Deco Union Cinema building and small courtyard to the southwest. The imposing structure dominates Gordon Street and occupies a prominent position on the crest of the hill. Internally, the building can be seen to have been stripped of original fixtures and fittings to facilitate the conversion to a night club. Whilst not regarded as nationally significant, the building represents a prominent part of Luton's early 20<sup>th</sup> century history and therefore has local significance and should be seen as a heritage asset. As such, plans to regenerate the site whilst retaining significant elements, such as the decorative façade are suggested to have a positive impact on the significance and preservation of the heritage asset.

It is considered that there is a low to medium potential for archaeological deposits to be preserved on site and that these are likely to be limited to Post Medieval foundations belonging to the former Welch's Hat Factory, with the construction of the former industrial site having potentially truncated earlier archaeological layers.

Considering the above, it is suggested that any further recording and investigation may be carried out by condition and may involve the completion of a Photographic or Level 2 building recording prior to inception of groundwork. Furthermore, monitoring of the site during significant groundwork may be considered.



#### 1. Introduction

### **Background**

- 1.1. In October 2016, Heritage Planning Services Ltd was commissioned by GPS Estates Ltd (the client) via Michael Hardiman & Associates LLP (the agent) to prepare a heritage statement for the former Union Cinema, Gordon Street, Luton, LU1 2QP (hereafter referred to as the Project Site). Permission is being sought for a large scale residential scheme involving the retention of the majority of the façade to the existing building and the erection of a new building behind and to the northern end.
- 1.2. The Heritage Statement has been requested to inform on the significance of the former Union Cinema, to determine the built and archaeological heritage of the site and to understand the harm that may be caused to that heritage asset and to provide suitable mitigation advice to minimise that harm.
- 1.3. This document has been compiled by Sam Driscoll BA (Hons), MA, MCI*f*A and is completed under HPS project reference HPS-145/16.



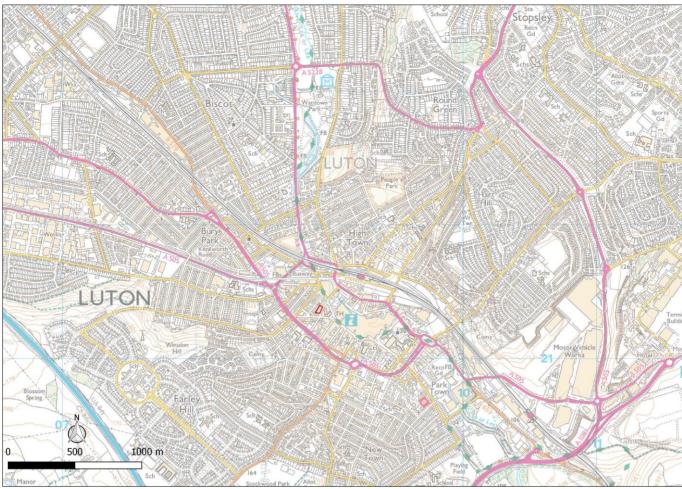


Figure 1: General location of the Project Site (centred on NGR 508927,221369 outlined in red)

### The Project Site and Study Area

1.4. The Project Site is located in the central area of the town of Luton, Bedfordshire and comprises buildings belonging to the former Union Cinema, designed by <sup>1</sup>Leslie H. Kemp in 1934 and opened on the 11<sup>th</sup> October 1937. The building is located to on Gordon Street and is accessible from both Gordon Street and Lancret's Path, to the rear. The development area is located just within the northern extent of Luton Town Conservation Area. The area represents the central core of the historic town, which today is defined by 19<sup>th</sup> – 20<sup>th</sup> century development, comprising a mix of urban residential, retail, office and leisure facilities.

 $<sup>^1</sup>$  Kemp & Tasker - Leslie H Kemp and Frederick E Tasker were English architects who practiced in the 1930s as Kemp & Tasker.





Figure 2: Detailed location of the Project Site (outlined in red)

- 1.5. The original course of the River Lea is located 160m to the northeast of the Project Site. The site is located on the southwest river escarpment, which can be seen in the topography of the Project Site, which drops away steeply to the northeast.
- 1.6. Geologically the site is defined by Quaternary sand and gravel, glaciofluvial deposits, overlaying Late Cretaceous Holywell Nodular Chalk and New Pit Chalk formation.
- 1.7. A radius of 750m has been given for the Study Area within the DBA.

### **Site Visit**

1.8. The Project Site was accessed on the 26<sup>th</sup> October 2016. The footprint of the proposed development area is defined by the standing buildings belonging to the former 1930s cinema, which have been converted for use as a nightclub in recent history. A small courtyard is undeveloped to the south of the structure. The building is now standing derelict. The interior displays the modern décor, fixtures



and fittings belonging to the recent incarnation of the premises and no original features were identified at the time of the visit.

1.9. The Art Deco building is constructed in brick, with English Bond coursing. The façade displays a first floor, limestone balcony, with multi lite window, embellished with fluted ionic columns supporting a limestone relief. Fluted limestone vertical columns divide the remainder of the exterior, which is otherwise plain. As expected, there are very few windows on the façade, with just seven small openings noted to the southern end of the building and two at ground level to the north, presumably in the region of working areas and stairs. A decorative unglazed brick lattice is preserved to the north of the façade, which would appear to be a vent.



Photo 1 North facing view of the former Union Cinema (Project Site).





Photo 2 East facing elevation of the former Union Cinema, first floor detail.



Photo 3 Restricted view of northwest facing elevation from Lancret's Path.





Photo 4 Northeast facing view of courtyard from Lancret's Path.

# 2. Planning Policy

### **NPPF**

2.1. "In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary." Paragraph 128.



#### 3. Aims

- 3.1. The aim of this study is to:
  - Identify the presence of designated and non-designated cultural heritage assets within the Study Area;
  - Identify the potential of the Project Site to include archaeological deposits and to determine, where possible, their condition and likely level of survival;
  - Provide an assessment of the known or predicted heritage assets considering their archaeological, historic, architectural and artistic interests;
  - Define the potential development impact to the archaeological resource;
  - Assess the significance of the non-designated assets that formed the basis for refusal of planning permission.

### 4. Methodology

- 4.1. This document has been prepared in accordance with the CIfA Standard and Guidance for historic environment desk-based assessment (revised Dec 2014), which states that a DBA 'will determine, as far as is reasonably possible from existing records, the nature, extent and significance of the historic environment within a specified area' and that in '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' (CIfA 2014: 4).
- 4.2. All work was carried out in line with the following standards and guidance-
  - Standard and guidance for historic environment desk-based assessment. The Chartered Institute for Archaeologists Guidance Document, University of Reading, Reading;
  - The Management of Archaeological Projects-2. English Heritage, 1991;
  - National Planning Policy Framework (NPPF) Paragraph 128. Communities and Local Government 2012.
- 4.3. The study involved consultation of available archaeological and historical information from documentary, cartographic and historic environment record sources.



- 4.4. The aim was to produce a document that not only considered the potential for archaeological remains on the Project Site, but to also put these into their historical and archaeological context.
- 4.5. The primary repositories for information consulted comprised:
  - Central Bedfordshire Council Historic Environment Record;
  - National Heritage List for England (NHLE);
  - Geological Maps;
  - Ordnance Survey maps of the site and its environs;
  - Historical maps and documents held in the Bedfordshire Archives and Records Service, local libraries or other archives (where relevant);
  - Appropriate archaeological and historical journals and books;
  - Unpublished research reports and archives, including those held by relevant museums and local societies.

## 5. Archaeological and Historical Baseline Survey

### Introduction

5.1. The information presented here is derived from sources including the Central Bedfordshire Historic Environment Record, the Historic England AMIE database, the National Heritage List for England (NHLE) and surviving cartographic resources, along with other published or documentary sources.

### **Designated Assets**

- 5.2. There are no scheduled monuments within the Study Area.
- 5.3. There are 60 Listed Buildings in the Study Area, but all of these are Grade II and will not be impacted upon by the development. Although there will be a minor increase to the height of the Project Site, it is considered that there will be a neutral impact, due to the density of existing buildings in Luton and existing impeded visibility.

#### **Events**

5.4. Distances given in the following text relate to the location of each event in relation to the Project Site.



- 5.5. St George's Square Renaissance, Luton, Bedfordshire: An Archaeological Investigation (HPS Event ID 5. 94m northeast). Six trenches were excavated in 2005. The investigation revealed 500mm -1.1m of modern deposits, comprising made ground sealing 20<sup>th</sup> century tarmac surfaces. Trenches 1 - 3 revealed truncated Victorian or Edwardian walls and surfaces between 550mm – 700mm below ground level (bgl). (Doyle & Williams 2005, 15 - 17).
- 5.6. The Mall, Arndale: An Archaeological Evaluation (HPS Event ID 2. 94m northeast). Two trenches were excavated. Trench 1 revealed modern material sealing evidence of a 19th century cellar cut into the natural, along with floor surfaces. Whilst the report doesn't make the depth clear, it is believed that the features were encountered c. 1.1m bgl (Doyle & Brogan; 8).
- 5.7. Flowers Way (HPS Event ID 24. 370m southeast). A watching brief carried out in 1996 revealed Post Medieval human remains in the vicinity of a Victorian cemetery.
- 5.8. Archaeological Evaluation at 21-25 Chapel Street (HPS Event ID 3. 450m SSE). Four trenches were excavated, revealing evidence of modern rubble and loose tarmac to a depth >1.18m bgl. 19<sup>th</sup> century cellar walls were identified in Trench 3, at an approximate depth of 2.9m bgl (Tong 2015, 8-9).
- 5.9. Crown Court (HPS Event ID 25. 470m SSE). A watching brief carried out between 1988-1989 revealed a flint lined well of potential Medieval date. In addition, 17th - 19th century cellars along Castle Street were seen to truncate further Medieval layers (SMA 1989, 9).
- 5.10. Archaeological Evaluation on Land to the Rear of 28-36 Park Street (HPS ID 22. 550m southeast). A single evaluation trench revealed 19<sup>th</sup> century truncation of stratigraphy down to the natural gravel, to a depth of 1.2m bgl (Crawley 2006, 1).
- 5.11. The remains of Robert de Waudari's <sup>2</sup>adulterine castle, Castle Street. (HPS Event ID 4. 630m SSE). Investigations ahead of the development at Luton's former bus depot revealed evidence of an extensive ditch, potentially associated with Robert de Waudari's castle, built in AD 1139 and demolished in AD 1154. The initial trench evaluation revealed a recut ditch and a gully. Finds included 2 sherds of possible Bronze Age pottery, possible Roman pottery and 13<sup>th</sup> – 14<sup>th</sup> century fabrics. (Coles 2002, 207). Further open area excavation revealed additional cut features. Finds suggest early activity on the site. A Prehistoric presence was identified in the form of 6 sherds of flint tempered pottery along with worked flint, including 12 flakes and a single scraper. A single sherd of

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<sup>&</sup>lt;sup>2</sup> Adulterine castles were fortifications built in England during the 12th century without royal approval.



late Saxon or Saxo-Norman St Neot's type ware was also recovered, however the majority of the pottery dated to the early Medieval period. Groundwork to develop land to the east of Castle Street in 1963 had identified a further portion of the castle ditch, along with banked ground, thought to be associated with a bailey. Excavations in 2002 confirmed the western extension of deposits associated with early Medieval activity, to the western side of Castle Street, in addition to raising the potential for earlier occupation in this area (ibid.).

- 5.12. Land at Castle Street/Holly Street (HPS Event ID 10. 700m SSE). Trial trenching in the vicinity of the castle complex above revealed evidence of a possible boundary ditch, interpreted as a potential field boundary and two post holes. Archaeological deposits were encountered between 700mm 1.25m (Pixley 2005).
- 5.13. Land at the University of Bedfordshire, Park Square (HPS Event ID 16. 610m southeast). Two trenches were excavated within Luton's Medieval core. Trench 1 revealed two human burials, orientated SW-NE, cut into the natural at 850mm bgl. Trench 2 revealed a depth > 2.1m bgl of Post Medieval layers. These were interpreted as backfill of a large feature. The full depth of the fill was not ascertained, and undisturbed natural was not reached (Turner 2009, 8-9).
- 5.14. Archaeological investigations on the western edge of the site of <sup>3</sup>Fulk de Breauté's castle, Park Square (HPS Event ID 13. 610m southeast). Excavation to the southwest of the trench evaluation above revealed significant Medieval activity, in the form of a large ditched feature, interpreted as part of the moat belonging to Fulk de Breauté's castle, along with post holes and gullies defining the footprint of a building. Associated pottery suggested a 12<sup>th</sup> 13<sup>th</sup> century date. Unfortunately, the depth of the archaeological features is not apparent in the report, however site photographs suggest that the moat cut was sealed by > 1m of made ground (Keir 2009, 3).
- 5.15. Archaeological Investigation, Recording, Analysis and Publication at the University of Bedfordshire, Park Street (Phase 2a) (HPS Event ID 19. 710m southeast). Further investigation of Fulk de Breauté's castle complex was carried out in 2009. Excavations revealed an enclosed industrial area with pits, post holes and boundary ditches identified, c. 600mm bgl (Woodley-Marshall et al 2011, 3).
- 5.16. Fairview House, University of Bedfordshire, Park Street (HPS Event ID 23. 680, southeast). Further evidence of Fulk de Breauté's castle was identified as a result of excavation, including a section of the moat and evidence of early abandonment c. AD 1224 (Streatfield 2011, 3).

<sup>&</sup>lt;sup>3</sup> Alternative spelling, Falkes de Breauté Heritage Planning Services Ltd



- 5.17. The combined results of the three investigations of Fulk de Breauté's castle complex revealed that the site was enclosed by a moat measuring up to 12m in width, with a depth of up to 3m, which is likely to have enclosed an area measuring 2.5ha. The site appears to have been occupied in the early Medieval period and abandoned by the mid-14<sup>th</sup> century. Residual Saxon ceramics identified during the excavation suggest earlier activity in the vicinity. This is not surprising when considering that the 12<sup>th</sup> century church of St Mary is located 100m to the north (Woodley-Marshall et al 2011, 12).
- 5.18. Vicarage Street Excavations (HPS Event ID 26. 750m southeast). Excavation revealed a portion of a ditch with a depth exceeding 2.5m. No finds were identified in the fill, however the sealing layer contained 14<sup>th</sup> century ceramic sherds (Luton Museum & Art Gallery 1976, 3). Further investigation was carried out on the site in 2008. Five trenches were excavated revealing ditches and deposits tentatively dated to the 13<sup>th</sup> 14<sup>th</sup> centuries. The features were encountered between 1.2m 1.4m bgl (Riccoboni 2008, 7-10).
- 5.19. Archaeological Evaluation on land at Vicarage Street (HPS Event 11 & 12. 745m southeast). Further investigations were carried out along Vicarage Street in 2010. Medieval features were identified, dating to the period following the demolition of Fulk de Breauté's castle, from AD 1250- 1400. Two short ditches and a large pit containing domestic debris and construction materials were excavated. Following the use of the site in the 13<sup>th</sup> 14<sup>th</sup> century, evidence suggests that the area returned to open land. The results also revealed residual Late Iron Age to Roman pottery in several contexts, along with fragments of Roman box flue tile. A single sherd of pottery similar to 5<sup>th</sup> 6<sup>th</sup> century fabric was also recovered.



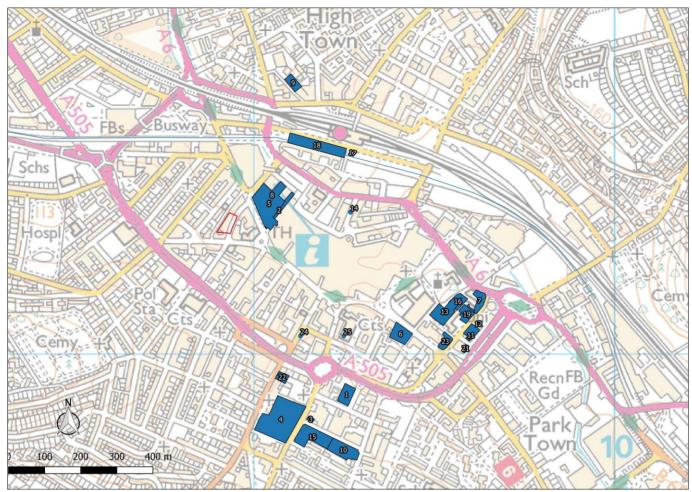


Figure 3: Events within the Study Area

#### **Discussion**

5.20. The Project Site is located within a region of limited archaeological investigation. However, the closest investigations, within 100m radius have revealed the survival of Post Medieval archaeological deposits at 550 – 1.1m bgl (HPS Event ID 2 & 5). Investigations within a 500m radius have revealed significant truncation resulting from the largescale urbanisation of the central area in the 19<sup>th</sup> century, with cellars cutting earlier stratigraphy. Further away, in the region of Castle Street and University of Bedfordshire significant Medieval deposits were encountered between 600mm to 1.25m below ground level.

#### Monuments

#### **Prehistoric**

5.21. Although the HER does not record any Prehistoric sites within the Study Area, assessment of the excavation reports does show residual Bronze Age material occurring in the vicinity of Castle Street (630 SSE) and Late Iron Age finds at Vicarage Street (745m southeast). These find locations occur



in relation to the most significant areas of investigation within the Study Area, prompted by investigations into Robert de Waudari and Fulk de Breauté's castle complexes. It is suggested that this evidence hints at Prehistoric settlement within the Study Area, however the large-scale redevelopment in the Victorian period has limited the potential to investigate further, due to significant truncation of early stratigraphy.

5.22. As there is no recorded evidence of Prehistoric activity close to the Project Site and due to the level of truncation caused by continued redevelopment in the Post Medieval and Modern Periods, the Prehistoric potential of the development area is considered low.

#### Romano-British (AD 44 AD 410)

- 5.23. There is limited evidence for Roman activity at Luton, with residual finds coming from the larger excavation areas referenced above. The most compelling evidence for Roman occupation is represented by building debris and pottery found at Vicarage Road (HPS Mon ID: 3), c. 730m ESE of the Project Site. Street lighting installation in the 1970s revealed Roman tile, pottery and flue tile, which was further corroborated by an evaluation in 1976.
- 5.24. However, further evidence for Romano-British activity in the Study Area is sparse. As such it is unlikely that Romano-British archaeology would be found at the Project Site and therefore the potential must be considered low.

#### **Early Medieval (AD 410 – AD 1066)**

- 5.25. There is limited evidence for early Medieval activity within the Study Area. Residual ceramic sherds were identified during the investigation of Fulk de Breauté's castle complex and late Saxon / Saxo Norman wares were identified during the excavation of the site of Robert de Waudari's castle.
- 5.26. More importantly, Luton is recognised historically as originating in the early Medieval period. There is an 8<sup>th</sup> century reference to Lygetune (Page 1908: 348-375), although it is also put forward as being a Saxon outpost of 6<sup>th</sup> century date, situated located over the River Lea (<a href="http://www.loveluton.org.uk/history/">http://www.loveluton.org.uk/history/</a>).
- 5.27. Regardless, Luton must be considered to have had an early Medieval presence. Page (1908) remarks that "the position of the present centre of the town and of the parish church of St Mary suggests that the original settlement at Luton occupied a piece of low ground close to the River Lea, perhaps



at some important ford" and that "starting from this nucleus the town spread, at first south, up the slopes on that side of the river, later in a north-westerly direction, when the present factories were built...". Although this could conceivably include the Project Site, this is unlikely as the Medieval boundary of the town (see HPS Mon ID: 8) would have had to have fossilised in the Early Medieval period and prior to the castle.

5.28. However, no early Medieval sites have been identified in close proximity to the Project Site and it is unlikely that archaeology dating to this period survives. As such the potential for early Medieval archaeology on the Project Site should be considered low.

#### Medieval (AD 1066 – AD 1539)

- 5.29. The Domesday Book records Luton (or Loitone) as having a large population (<a href="http://opendomesday.org/place/TL0821/luton/">http://opendomesday.org/place/TL0821/luton/</a>). It had been a royal manor during the reign of Edward the Confessor and was reckoned a manor of considerable importance, before it passed out of the royal hands, as testified in a grant to Robert Earl of Gloucester in the 12th century (Page 1908).
- 5.30. There are three prominent archaeological assets within the Study Area that date to the Medieval period. Robert de Waudari's Castle (c. 540m SSE of the Project Site, HPS Mon ID: 6) and the short-lived castle of Fulk de Breauté, located c.650m southeast of the Project Site (HPS Mon ID: 7). This castle was demolished in AD 1224 after it was shown that de Breauté unlawfully damned the River Lea, resulting in flooding to the surrounding property. The boundaries of both these castles are moderately well defined and there is nothing to imply that their extents covered the Project Site. They are in fact recorded as being beyond the Medieval core of the town.
- 5.31. The Project Site is also located within the Medieval town of Luton (HPS Mon ID: 8). The western boundary of the town was probably Lancret's Path just behind the Project Site. Whilst the HER shows the boundary ending on Gordon Street, this street is a recent addition and map regression would place the boundary to the west. The Luton Town Centre Conservation Area appears to confirm this.
- 5.32. A number of excavations within and immediately adjacent to the core of the town have continued to reveal Medieval archaeology including Medieval pottery (HPS Mon ID: 9), occupation (HPS Mon ID: 13, watermills (HPS Mon ID: 11-12) and a possible Medieval manor called Langley's Manor (HPS Mon ID: 10) located c. 500m southeast of the Project Site.
- 5.33. As the Project Site falls within the boundary of the Medieval Town is it possible that previous Medieval activity occurred on or around the development area. However, assessment of the surviving



stratigraphy would suggest that any Medieval archaeology would have been significantly truncated, if not destroyed by the 19<sup>th</sup> century development of the site and later construction of the Union Cinema. As such the potential for Medieval archaeology on the site should be considered low.

#### Post-Medieval (AD 1540 – AD 1900)

- 5.34. Like many other towns across the country, there is a clear increase in activity during the Post-Medieval period (see Project Gazetteer: 14-35). The industrialisation of Luton in the Post-Medieval period is seen through the construction and operation of several industrial sites, including a foundry (HPS Mon ID: 18), two breweries (HPS Mon ID: 26 & 34) and a gasworks (HPS Mon ID: 33). One of Luton's largest industries was established in this period. The straw hat trade started to grow in the late 17<sup>th</sup> early 18<sup>th</sup> centuries and one of the town's most recognised manufacturers, Welch & Sons moved production to the Project Site in the latter half of the 19<sup>th</sup> century.
- 5.35. Whilst there has been significant development on the Project site since the establishment of the Welch's hat factory, the potential for remnants of the 19<sup>th</sup> century buildings to survive is considered medium.

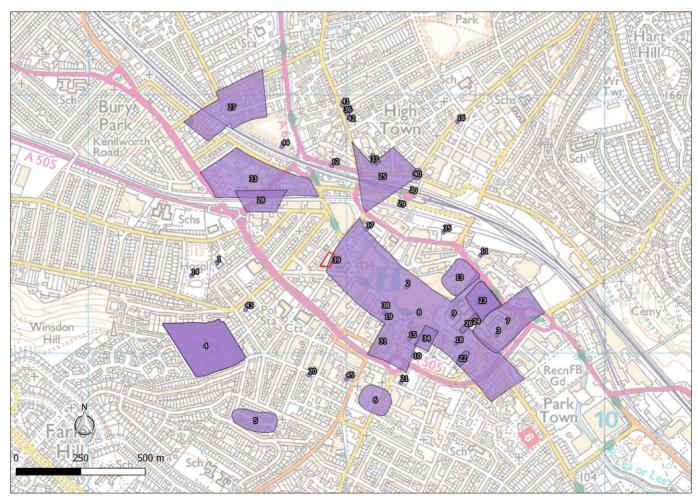


Figure 4: Monuments within the Study Area



## 6. Historic Development of the Project Site

6.1. In the early 19<sup>th</sup> century the main area of development comprised roadside plots spanning the both sides of George Street and Park Road (now Park Street) and branching south down London Road (now Castle Street) and northeast, towards St Mary's Church, on Church Street. Land surrounding the Project Site is developed up to the point of Lancret's Path. However, the Project Site itself is undeveloped at this time (Figure 5).



Figure 5 1815 Map of Luton (Allsopp 2010, 34)

6.2. The 1840's Tithe Map gives a more detailed view of the Project Site, with the plot boundary that would become Gordon Street shown, dividing plots 1460 to the southeast from 1416 to the northwest (Figure 6). The later 19<sup>th</sup> century layout has not yet been established, and the proposed development area is mainly defined by plot 1416, which is described farmland and homestead.

Number	Landowner	Occupier	Description
1416	Rev Richard Lucus	Elizabeth Gregory	Farm Homestead etc
1460	John Jones	Himself	Hose Warehouse and
			Gardens
1461	May Wood	Himself and Others	Houses Gardens etc
1462	Thomas Foster	George Cain and	Cottages
		Others	



1463	Thomas Cook	William Daucer(?) and	Houses Gardens etc
		Others	
1464	Elizabeth Crawley	Herself and another	House and Gardens
1465	Luton Churchwarden(s) of the Parish	Stephen White and	Tower Hill Cottages
		Others	

Table 1 Extract from 1840's Luton Tithe Apportionment

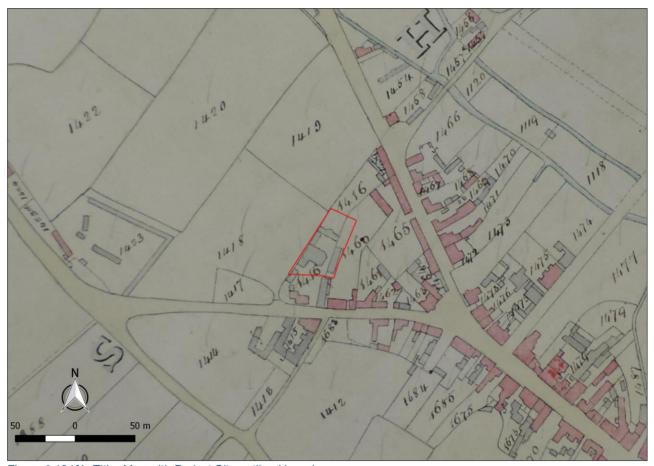


Figure 6 1840's Tithe Map with Project Site outlined in red.

- 6.3. In 1867/1868 Midland railway establish a link from Bedford to London, through Luton. The main line is located 220m to the north of the Project Site.
- 6.4. By 1880 the Project Site had been extensively developed. Gordon Street was not established until the 1890s, however the proposed development area was now part of a complex of industrial buildings belonging to Welch & Sons Straw Hat Factory. Goad's Insurance Plan of Luton (Figure 8) illustrates that the modern day plot is located on the site of warehouses and workshops, including the bleaching house and sulphur chamber fronting Lancret's Path. New technologies and improving transport routes led hat makers like Welch to Luton in the early 1800s. By the latter half of the 19<sup>th</sup> century Welch and Sons had moved their operations to the Upper George Street site (the Project



Site) and although the industry was in its decline, the factory located on the Project Site was paid a visit by the Prince of Wales on December 14<sup>th</sup> 1878.



Figure 7 1880 Town Plan, Ordnance Survey Map (Project Site outlined in red).





Figure 8 1895 Goad Insurance Plan of Luton.

6.5. By the 1920's land between Gordon Street and Lancret's Path had been fully developed (Figure 9). The Project Site was still defined by the large warehouses and buildings associated with the hat works. However, by 1937 the plot has been extensively redeveloped to make way for the Union Cinema, which still occupies the site today (Figure 10).



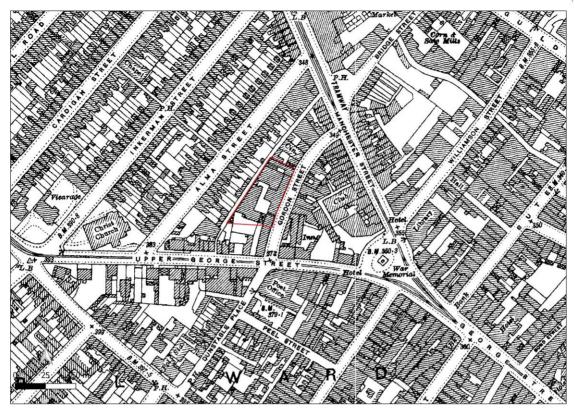


Figure 9 2<sup>nd</sup> Revision Ordnance Survey 1924 (Project Site Outlined in red).

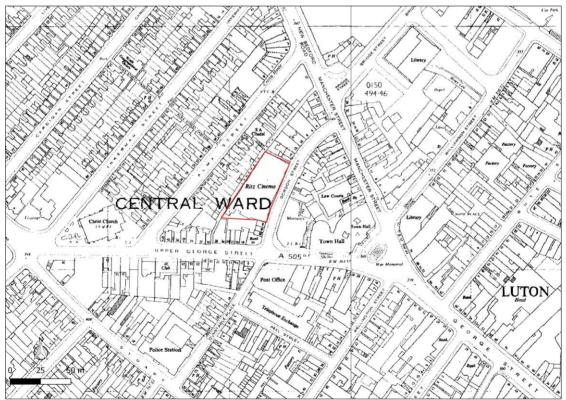


Figure 10 Ordnance Survey 1971 (Project Site outlined in red).



## 7. Impact Assessment (proposals and impact to significance)

- 7.1. The Project Site comprises the former 1930's Art Deco Union Cinema building and small courtyard to the southwest. The imposing structure dominates Gordon Street and occupies a prominent position on the crest of the hill. Internally, the building can be seen to have been stripped of original fixtures and fittings to facilitate the conversion to a night club. Whilst not regarded as nationally significant, the building represents a prominent part of Luton's early 20<sup>th</sup> century history and therefore has local significance and should be seen as a heritage asset. As such, plans to regenerate the site whilst retaining significant elements, such as the decorative façade are suggested to have a positive impact on the significance and survival of the heritage asset.
- 7.2. Regeneration plans will involve the retention of the façade and redevelopment to the rear of the plot and to the north. It is considered that there is a low to medium potential for archaeological deposits to be preserved on site and that these are likely to be limited to Post Medieval foundations belonging to the former Welch's Hat Factory, with the construction of the former industrial site having potentially truncated earlier archaeological layers.
- 7.3. Considering the above, it is suggested that any further recording and investigation may be carried out by condition and may involve the completion of a Photographic or Level 2 building recording prior to inception of groundwork. Furthermore, monitoring of the site during significant groundwork may be considered.



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# 9. Appendices

#### Appendix 1 Event Gazetteer

HPS EV ID	Name	CBC EV
1	Watching Brief: Corner of Oxford Road and Union Street, Luton	EBD96
2	The Mall, Arndale, Luton; An Archaeological Evaluation	EBD97
3	Watching brief: 63-65 Castle Street, Luton	EBD98
4	Excavation at Castle Street, Luton: Robert de Waudari's Castle?	EBD186
5	St George's Square Renaissance, Luton, Bedfordshire: An Archaeological Investigation	EBD408
6	An Archaeological Evaluation at Land to the Rear of 28-36 Park Street, Luton	EBD411
7	Youth House, St Mary's Road, Luton; An Archaeological Evaluation	EBD615
8	St George's Square Renaissance, Luton; an Archaeological Desk-Based Assessment	EBD753
9	114-134 Midland Road, Luton; Air-raid Shelter Record survey	EBD917
10	Land at Castle Street/Holly Street, Luton: Archaeological Field Evaluation	EBD984
11	An Archaeological Evaluation on land at Vicarage Street, Luton; Site A	EBD997
12	An Archaeological Evaluation on land at Vicarage Street, Luton; Site A	EBD997
13	Archaeological investigations on the western edge of the site of Faulk de Breaute's castle, Park Square, Luton	EBD102 6
14	Plaiters' Lea Conservation Area, Luton	EBD104
15	The remains of Robert de Waudari's adulterine castle, Castle Street, Luton	EBD106
16	Land at the University of Bedfordshire, Park Square, Luton; Archaeological trial Trenching	EBD107
17	Luton - Dunstable Busway; Structural Recording	EBD107 8
17	Luton - Dunstable Busway; Structural Recording	EBD107 8
18	Luton Dunstable Busway; Archaeological Observation, Investigation, Recording, Analysis and Publication	EBD107 9
18	Luton Dunstable Busway; Archaeological Observation, Investigation, Recording, Analysis and Publication	EBD107 9
18	Luton Dunstable Busway; Archaeological Observation, Investigation, Recording, Analysis and Publication	EBD107 9
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18	Luton Dunstable Busway; Archaeological Observation, Investigation, Recording, Analysis and Publication	EBD107 9
18	Luton Dunstable Busway; Archaeological Observation, Investigation, Recording, Analysis and Publication	EBD107 9
18	Luton Dunstable Busway; Archaeological Observation, Investigation, Recording, Analysis and Publication	EBD107 9
19	Archaeological Investigation, Recording, Analysis and Publication at the University of Bedfordshire, Park Street, Luton (Phase 2a); UPD & Assessment	EBD111 0
20	Land at the University of Bedfordshire, Vicarage Street (Phase 2a), Luton	EBD114 5
21	4 Lea Road, Luton; Archaeological Excavation, Recording, Analysis and Publication	EBD114 9
22	Archaeological Evaluation at 21-25 Chapel Street, Luton	EBD125 0
23	Fairview House, University of Bedfordshire, Park Street, Luton (Phase 3 - Library and Learning Resources Centre) - UPD	EBD127 7
24	Flowers Way, Luton	EBD132 7



25	Watching Brief - Crown Courts Site	EBD142
26	Trial Excavations south of Vicarage Street	EBD143
		8



#### Appendix 2: Monument Gazetteer

HPS Mon ID	Name	MonType	Period	CBC PRN
1	ROMAN COIN	FINDSPOT	Roman	3878
2	?ROMAN KILN, Waller Street	BUILDING, DRAIN, KILN	Roman	205
3	ROMAN BUILDING DEBRIS AND POTTERY	BUILDING	Roman	10599
4	ROMAN POTTERY	FINDSPOT	Roman	1981
5	ROMAN COIN	FINDSPOT	Roman	1977
6	SITE OF CASTLE, Castle Street/Holly Street	CASTLE, DITCH, PIT, GULLY, POST HOLE, BOUNDARY DITCH?, QUARRY, QUARRY, POST HOLE, STRUCTURE?, POST HOLE, GULLY, DITCH, PIT	Roman-Post Medieval	186
7	SITE OF CASTLE, possibly of Faulke de Breaute	CASTLE, MOAT, MANOR, WALL, FLOOR, BUILDING, GULLY, POST HOLE, PIT, POST HOLE, GULLY	Medieval	185
8	LUTON MEDIEVAL TOWN	TOWN, CELLAR, WALL, YARD, WELL	Medieval	16993
9	MEDIEVAL POTTERY	FINDSPOT	Medieval	1948
10	LANGLEY'S MANOR	MANOR HOUSE	Medieval	10820
11	WATERMILL (Abbey Mill)	WATERMILL	Medieval	10819
12	WATERMILL (North Mill), north of Mill Street	WATERMILL	Medieval/Post Medieval	10818
13	MEDIEVAL & POST-MEDIEVAL OCCUPATION, Church Street	OVEN, WELL, BUILDING	Medieval/Post Medieval	11950
14	POSSIBLE BRICK KILN, at South side of Dallow Road	BRICKWORKS	Post Medieval	9677
15	FRIENDS' BURIAL GROUND, Castle Street	FRIENDS BURIAL GROUND	Post Medieval	8928
16	WINDMILL	BUILDING, WINDMILL	Post Medieval	3167
17	CORN & SAW MILLS	CORN MILL, SAW MILL	Post Medieval	2988
18	FOUNDRY	FOUNDRY	Post Medieval	2898
19	POST-MEDIEVAL POTTERY, George Street	FINDSPOT	Post Medieval	2847
20	EBENEZER CHAPEL BURIAL GROUND, Dumfries Street/Windsor Walk	CEMETERY	Post Medieval	19555
21	UNION CHAPEL BURIAL GROUND, Union Street	CEMETERY	Post Medieval	19554
22	BAPTIST BURIAL GROUND, Park Street	CHURCHYARD	Post-Medieval	9012
23	ST MARY'S PARISH CHURCHYARD	CHURCHYARD	Post-Medieval	8926
24	CHILDREN'S CEMETERY, St Ann's Lane	INHUMATION	Post-Medieval	19531
25	GRAVEL PIT, Midland Road	GRAVEL PIT	Post-Medieval	12383
26	BREWERY, Park Square	BREWERY	Post-Medieval	12376
27	PEST HOUSE (suggested by placename)	INFECTIOUS DISEASES HOSPITAL	Post-Medieval	12363
28	PEST HOUSE (suggested by placename)	INFECTIOUS DISEASES HOSPITAL	Post-Medieval	12363
29	HATFIELD LUTON AND DUNSTABLE BRANCH RAILWAY (Great Northern Railway)	RAILWAY	Post-Medieval	14086
30	FORMER MIDLAND RAILWAY LINE	RAILWAY	Post-Medieval	12933



31	WESLEYAN CHURCHYARD,	CHURCHYARD	Post-	9011
	Chapel Street		Medieval/Moder	
			n	
32	LUTON CEMETERY	CEMETERY, WAR MEMORIAL	Post-	8927
			Medieval/Moder	
22	CASIMORKS	CACWORKS	n n	6004
33	GASWORKS	GAS WORKS	Post-	6804
			Medieval/Moder	
34	LUTON BREWERY, Park Street	BREWERY	n Post-	6541
34	West	BNLVVLNT	Medieval/Moder	0341
	West		n	
35	CHIMNEY OF GREAT	CHIMNEY, STEAM MILL	Post	10528
33	NORTHERN STEAM MILLS,	Crimine 1, 51 E7 WY WHILE	Medieval/Moder	10320
	Guildford Street		n	
36	WWII BOMB IMPACT SITE,	BOMB SITE	wwii	19783
	Frederick Street			
37	AIR RAID SHELTERS, 114-134	AIR RAID SHELTER	WWII	18328
	Midland Road, Luton			
38	WW2 AIR RAID SHELTER,	AIR RAID SHELTER	WWII	17934
	George Street			
39	WW2 AIR RAID SHELTER	AIR RAID SHELTER	WWII	17928
40	WW2 AIR RAID SHELTER	AIR RAID SHELTER	WWII	17927
41	WWII BOMB IMPACT SITE, hat	BOMB SITE	WWII	19785
	warehouse, Frederick Street			
42	WWII BOMB IMPACT SITE,	BOMB SITE	WWII	19784
	Mussons Path			
43	WW2 SURFACE AIR RAID	AIR RAID SHELTER	wwii	18020
	SHELTER			
44	WW2 SPIGOT MORTAR SITE,	SPIGOT MORTAR EMPLACEMENT	WWII	17935
	The Moor			
45	DRESSED STONE BLOCKS	STONE	Unknown	17791



#### Appendix 3 Standards and Guidance

### Methodology

The methodology employed in compiling this document is derived from a number of key sources.

This DBA has been undertaken in accordance with the *Standard and Guidance for historic environment desk-based assessment* (CIfA 2014), which states that a DBA 'will determine, as far as is reasonably possible from existing records, the nature, extent and significance of the historic environment within a specified area' and that in '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 (CIfA 2014: 4).

#### Study Area

A 750m Study Area was established for the Project Site in order to contextualise the known and potential archaeological resource.

#### Data Collation

The DBA involved consultation of available archaeological and historical information from documentary, cartographic, photographic and historic environment record sources. The aim was to produce a document that not only considered the potential for archaeological remains on the Project Site, but to also put these into their historical and archaeological context.

This DBA has been undertaken in accordance with the Chartered Institute for Archaeologists, 2014. Standard Guidance for Historic Environment Desk-Based Assessment. Reading: CIfA.



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