

# Appendices to Chapter J

## Built Heritage

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Appendix J1 – Built Heritage Baseline Assessment



# Appendix J I

## Built Heritage Baseline Assessment

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# BUILT HERITAGE BASELINE ASSESSMENT

MILTON KEYNES EAST

JCH01144  
Milton Keynes East  
FINAL  
March 2021

## REPORT

### Quality Management

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Prepared by:

**RPS**

**Victoria Brocksopp BA (Hons) MA**  
**Senior Associate Director**

20 Farringdon Street  
London,  
EC4A 4AB

Prepared for:

**ST JAMES GROUP**

**Ashley Spearing**  
**Development Director**

Berkeley House  
15b St George Wharf  
London  
SW8 2LE

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# 1 INTRODUCTION

- 1.1 This Built Heritage Baseline Assessment has been researched and prepared by RPS on behalf of the St James Group with regard to the Site known as Milton Keynes East.
- 1.2 The Site is located within the Borough of Milton Keynes. It principally comprises a large irregularly shaped area of farmland, to the north east of the M1 motorway. The boundary includes sections of London Road (A509) and Newport Road to the north of the M1, and extends south of the M1 to include a section of Tongwell Street (V11). An additional area of land is included to the immediate south of the M1, to the north and east of the Cotton Valley sewage treatment works (Figure 1).
- 1.3 The Milton Keynes Local Plan, Plan:MK (adopted March 2019) allocates those areas of the Site to the north of the M1 for a mixed residential and employment development, as part of the Milton Keynes East Strategic Urban Extension.
- 1.4 The proposed development comprises a:  
*“Hybrid planning application encompassing:*  
*(i) outline element (with all matters reserved) for a large-scale mixed-use urban extension (creating a new community) comprising: residential development; employment including business, general industry and storage/distribution uses; a secondary school and primary schools; a community hub containing a range of commercial and community uses; a new linear park along the River Ouzel corridor; open space and linked amenities; new redways, access roads and associated highways improvements; associated infrastructure works; demolition of existing structures and*  
*(ii) detailed element for strategic highway and multi-modal transport infrastructure, including: new road and redway extensions; a new bridge over the M1 motorway; a new bridge over the River Ouzel; works to the Tongwell Street corridor between Tongwell roundabout and Pineham roundabout including new bridge over the River Ouzel; alignment alterations to A509 and Newport Road; and associated utilities, earthworks and drainage works.”*
- 1.5 The Site entirely surrounds (but does not include) one Grade II listed building which is included on the statutory list as Moulsoe Buildings Farmhouse (currently a Holiday Inn). There are a further twenty one listed buildings (three listed at Grade I and eighteen at Grade II), two conservation areas and three non-designated heritage assets recorded on the local Historic Environment Record (HER) within a 500m radius of the Site (Figure 2). Whilst lying outside of this study area, the Grade II Registered Park and Garden at Campbell Park, Milton Keynes, is also appraised within this report as part of a comprehensive assessment, recognising its position in the landscape with longer distance views north eastwards towards the Site.
- 1.6 This baseline assessment appraises the significance of the identified heritage assets, including any contribution made by their respective settings (and the Site where relevant) to that significance. It assesses potential effects of the proposed development on the identified heritage assets, with reference to the supporting set of parameter plans and landscaping strategy outlined in the Design and Access Statement (by HTA Design).
- 1.7 This baseline assessment uses the terminology of the National Planning Policy Framework, which makes reference to the “heritage significance” of heritage assets, i.e. the value of a heritage asset to this and future generations because of its heritage interest. Within the ES Chapter, which this Built Heritage Baseline Assessment accompanies as Appendix J, the term “significance” has a different meaning in Environmental Impact Assessment terminology and instead refers to the overall effect, taking into account the importance of the receptor and the magnitude of impact.
- 1.8 The findings of this report are based on the known conditions at the time of writing and all findings and conclusions are time limited to no more than 3 years from the date of this report. All maps, plans and photographs are for illustrative purposes only.

- 1.9 A separate Archaeological Desk Based Assessment has been prepared for the Site with regard to archaeological matters.

## 2 LEGISLATIVE AND PLANNING POLICY FRAMEWORK

- 2.1 The statutory requirements and national and local policy provide a clear framework for the consideration of development proposals that affect the historic built environment. The Planning (Listed Buildings and Conservation Areas) Act 1990, provides the overarching statutory requirements in the determination and assessment of development proposals in the historic environment. The National Planning Policy Framework (NPPF) sets out the Government's policies and requirements at a national level and the Planning Practice Guidance reflects the Secretary of State's views on the way policy should be applied. It is acknowledged that matters of legal interpretation are determined in the Courts but the NPPF and the Practice Guidance set out clearly the Government's priorities and aspirations for planning nationally. Historic England documents provide technical advice that is designed to explain and assist in the implementation of legislation and national policy. This hierarchy of statutory duty, policy and best practice has been used to inform the assessment of the application proposals which is included in this statement.
- 2.2 The current national legislative and planning policy system identifies, through the National Planning Policy Framework (NPPF), that applicants should consider the potential impact of development upon 'heritage assets'. This term includes: designated heritage assets which possess a statutory designation (for example listed buildings and conservation areas); and non-designated heritage assets, typically compiled by Local Planning Authorities (LPAs) and incorporated into a Local List or recorded on the Historic Environment Record.

### Legislation

- 2.3 Where any development may affect certain designated heritage assets, there is a legislative framework to ensure proposed works are developed and considered with due regard to their impact on the historic environment. This extends from primary legislation under the Planning (Listed Buildings and Conservation Areas) Act 1990.
- 2.4 The relevant legislation in this case extends from section 66 of the 1990 Act which states that:
- In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.*
- 2.5 This requirement means there is an implicit acknowledgement that although a development proposal may not affect the physical fabric of a listed building, it is possible to affect its character as a building of architectural or historic interest through development that may be located within its setting.
- 2.6 The meaning and effect of these duties have been considered by the courts, including the Court of Appeal's decision in relation to Barnwell Manor Wind Energy Ltd v East Northamptonshire District Council [2014] EWCA Civ 137.
- 2.7 The Court agreed within the High Court's judgement that Parliament's intention in enacting section 66(1) was that decision makers should give 'considerable importance and weight' to the desirability of preserving (i.e. keeping from harm) the setting of listed buildings.
- 2.8 Whilst there is no statutory duty in primary legislation to have regard to the setting of conservation areas there is nevertheless a clear requirement under the NPPF to give great weight to the conservation of heritage assets and their settings (see below).



## National Planning Policy

### National Planning Policy Framework (Ministry of Housing, Communities and Local Government, February 2019)

- 2.9 The NPPF is the principal document that sets out the Government's planning policies for England and how these are expected to be applied.
- 2.10 It defines a heritage asset as a: 'building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest'. This includes both designated and non-designated heritage assets.
- 2.11 Significance is defined within the NPPF Glossary as the value of a heritage asset to this and future generations because of its heritage interest. Significance derives not only from a heritage asset's physical presence, but also from its setting. The NPPF definition further states that in the planning context heritage interest may be archaeological, architectural, artistic or historic.
- 2.12 Section 16: Conserving and Enhancing the Historic Environment relates to the conservation of heritage assets in the production of local plans and decision taking. It emphasises that heritage assets are 'an irreplaceable resource, and should be conserved in a manner appropriate to their significance'.
- 2.13 For proposals that have the potential to affect the significance of a heritage asset, paragraph 189 requires applicants to identify and describe the significance of any heritage assets that may be affected, including any contribution made by their significance. The level of detail provided should be proportionate to the significance of the heritage assets affected. This is supported by paragraph 190, which requires LPAs to take this assessment into account when considering applications.
- 2.14 Under 'Considering potential impacts' the NPPF emphasises that 'great weight' should be given to the conservation of designated heritage assets, irrespective of whether any potential impact equates to total loss, substantial harm or less than substantial harm to the significance of the heritage assets.
- 2.15 Paragraph 196 states that where a development will result in less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.
- 2.16 Paragraph 197 states that the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.
- 2.17 Paragraph 200 notes that local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites and within the setting of heritage assets to enhance or better reveal their significance. It emphasises that proposals that preserve those elements of the setting that make a positive contribution to, or better reveal the significance of, the asset should be treated favourably.

## National Guidance

### Planning Practice Guidance (Ministry of Housing, Communities and Local Government)

- 2.18 The Planning Practice Guidance (PPG) has been adopted in order to aid the application of the NPPF. It reiterates that conservation of heritage assets in a manner appropriate to their significance is a core planning principle.
- 2.19 It is crucial that the significance of a heritage asset is understood and consideration of this incorporated into decision making. Paragraph 7 of the guidance explains that heritage assets may

be affected by, direct physical change or by change in their setting. Being able to properly assess the nature, extent and importance of the significance of a heritage asset, and the contribution of its setting, is very important to understanding the potential impact and acceptability of development proposals.

- 2.20 The Development would have an impact on the setting of a number of heritage assets. The issue of the impact of the proposals on the setting of these heritage assets is an important part of the assessment of the development proposals. The policy guidance states that as part of the assessment of the impact of a proposal, a thorough assessment of the impact on setting needs to take into account, and be proportionate to, the significance of the heritage asset under consideration and the degree to which proposed changes enhance or detract from that significance and the ability to appreciate it.
- 2.21 The guidance in paragraph 13, refers to the definition of setting in the Glossary of the NPPF. The guidance cautions that consideration of the setting must not be limited to a matter of views to or from the asset. It advises that the extent and importance of setting is often expressed by reference to the visual relationship between the asset and the proposed development and associated visual/physical considerations. Although views of or from an asset will play an important part in the assessment of impacts on setting, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. For example, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each.
- 2.22 The guidance sets out to explain how proposals can avoid or minimise harm to the significance of a heritage asset or the wider historic environment. It states that a clear understanding of the significance of a heritage asset and its setting is necessary to develop proposals which avoid or minimise harm. Early appraisals, or specialist investigation can help to identify constraints and opportunities arising from the asset and such studies can reveal alternative development options, for example more sensitive designs or different orientations, that will deliver public benefits in a more sustainable and appropriate way (paragraph 8).
- 2.23 Key elements of the guidance relate to assessing harm. It states that substantial harm is a high bar that may not arise in many cases and that while the level of harm will be at the discretion of the decision maker, generally substantial harm is a high test that will only arise where a development seriously affects a key element of an asset's special interest. It is the degree of harm, rather than the scale of development, that is to be assessed.

## **BS 7913:2003 Guide to the Conservation of Historic Buildings**

- 2.24 The British Standard 7913:2003 Guide to the Conservation of Historic Buildings provides guidance on the assessment of significance. It states that significance represents a public interest, and the planning system, and the policy and legislation which support it, reflect this.
- 2.25 In identifying how significance may be assessed it is stated that heritage has cultural, social, economic and environmental values, and that the attributes that combine to define the significance of a historic building can relate to its physical properties or to its context.
- 2.26 The guidance identifies that there are many different ways in which heritage values can be assessed. It recognises that some heritage bodies of the United Kingdom have suggested that these fall into the following groups:
- a) aesthetic value, derived from ways in which people draw sensory and intellectual stimulation from a place (this encompasses things purposely designed for that effect and those that are not (e.g. the picturesque, the sublime));
  - b) communal value, derived from the meanings of a place for people who relate to it in different ways, associations with social groups and individuals (this changes over time);

- c) evidential value, derived from the potential of a place to yield evidence about the past (e.g. archaeology);
- d) historical value, derived from the ability of a place to demonstrate or illustrate an aspect of the past or association with historic figure or event (for example a battlefield or memorial).

2.27 The guidance goes further to suggest an alternative approach and to think of a historic building's significance as comprising individual heritage values from a list that might include:

architectural, technological or built fabric value; townscape characteristics; spatial characteristics; archaeological value; artistic value; economic value; educational value; recreational value; social or communal value; cultural value; religious value; spiritual value; ecological value; environmental value; commemorative value; inspirational value; identity or belonging; national pride; symbolic or iconic value; associational value; panoramic value; scenic value; aesthetic value; material value; and technological value.

## Overview: Historic Environment Good Practice Advice in Planning

2.28 The PPS5 Practice Guide was withdrawn in March 2015 and replaced with three Good Practice Advice in Planning Notes (GPAs) published by Historic England. *GPA1: The Historic Environment in Local Plans* provides guidance to local planning authorities to help them make well informed and effective local plans. *GPA2: Managing Significance in Decision-Making* includes technical advice on the repair and restoration of historic buildings and alterations to heritage assets to guide local planning authorities, owners, practitioners and other interested parties. *GPA 3: The Setting of Heritage Assets* replaces guidance published in 2011. These are complemented by the Historic England Advice Notes in Planning which include *HEA1: Understanding Place: Conservation Area Designation, Appraisal and Management* (February 2016), *HEA2: Making Changes to Heritage Assets* (February 2016), *HEA3: The Historic Environment and Site Allocations in Local Plans* (October 2015), and *HEA4: Tall Buildings* (December 2015).

### GPA1: The Historic Environment in Local Plans (March 2015)

2.29 This advice note focuses on the importance of identifying heritage policies within Local Plans. The advice echoes the NPPF by stressing the importance of formulating Local Plans based on up-to-date and relevant evidence on economic, social and environmental characteristics and prospects of the area, including the historic environment.

### GPA2: Managing Significance in Decision-Taking in the Historic Environment (March 2015)

2.30 This document provides advice on numerous ways in which decision making in the historic environment could be undertaken, emphasising that the first step for all applicants is to understand the significance of any affected heritage asset and the contribution of its setting to that significance. In line with the NPPF and PPG, the document states that early engagement and expert advice in considering and assessing the significance of heritage assets is encouraged. The advice suggests a structured, staged approach to the assembly and analysis of relevant information:

1. Understand the significance of the affected assets;
2. Understand the impact of the proposal on that significance;
3. Avoid, minimise and mitigate impact in a way that meets the objectives of the NPPF;
4. Look for opportunities to better reveal or enhance significance;
5. Justify any harmful impacts in terms of the sustainable development objective of conserving significance balanced with the need for change; and

6. Offset negative impacts to significance by enhancing others through recording, disseminating and archiving archaeological and historical interest of the important elements of the heritage assets affected.

### **GPA3: The Setting of Heritage Assets (Second Edition; December 2017)**

- 2.31 This advice note focuses on the management of change within the setting of heritage assets. This document replaces GPA3: The Setting of Heritage Assets (March 2017) and Seeing History in the View (English Heritage, 2011) in order to aid practitioners with the implementation of national legislation, policies and guidance relating to the setting of heritage assets found in the 1990 Act, the NPPF and PPG. The guidance is largely a continuation of the philosophy and approach of the 2011 and 2015 documents and does not present a divergence in either the definition of setting or the way in which it should be assessed.
- 2.32 As with the NPPF the document defines setting as ‘the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve’. Setting is also described as being a separate term to curtilage, character and context. The guidance emphasises that setting is not a heritage asset, nor a heritage designation, and that its importance lies in what it contributes to the significance of the heritage asset, or the ability to appreciate that significance. It also states that elements of setting may make a positive, negative or neutral contribution to the significance of the heritage asset.
- 2.33 While setting is largely a visual term, with views considered to be an important consideration in any assessment of the contribution that setting makes to the significance of an asset, and thus the way in which an asset is experienced, setting also encompasses other environmental factors including noise, vibration and odour. Historical and cultural associations may also form part of the asset’s setting, which can inform or enhance the significance of a heritage asset.
- 2.34 This document provides guidance on practical and proportionate decision making with regards to the management of change within the setting of heritage assets. It is stated that the protection of the setting of a heritage asset need not prevent change and that decisions relating to such issues need to be based on the nature, extent and level of the significance of a heritage asset, further weighing up the potential public benefits associated with the proposals. It is further stated that changes within the setting of a heritage asset may have positive or neutral effects.
- 2.35 The document also states that the contribution made to the significance of heritage assets by their settings will vary depending on the nature of the heritage asset and its setting, and that different heritage assets may have different abilities to accommodate change without harming their significance. Setting should, therefore, be assessed on a case-by-case basis.
- 2.36 Historic England recommends using a series of detailed steps in order to assess the potential effects of a proposed development on significance of a heritage asset. The 5-step process is as follows:
  - 1) Identify which heritage assets and their settings are affected;
  - 2) Assess the degree to which these settings and views make a contribution to the significance of a heritage asset(s) or allow significance to be appreciated;
  - 3) Assess the effects of the proposed development, whether beneficial or harmful, on the significance or on the ability to appreciate it;
  - 4) Explore ways to maximise enhancement and avoid or minimise harm; and,
  - 5) Make and document the decision and monitor outcomes.

## HEAN1: Understanding Place: Conservation Area Designation, Appraisal and Management (Second Edition, February 2019)

- 2.37 This document forms revised guidance which sets out the ways to manage change in order to ensure that historic areas are conserved. In particular information is provided relating to conservation area designation, appraisal and management. Whilst this document emphasises that ‘activities to conserve or invest need to be proportionate to the significance of the heritage assets affected,’ it reiterates that the work carried out needs to provide sufficient information in order to understand the issues outlined in Paragraph 129 of the NPPF, relating to the assessment of any heritage assets that may be affected by proposals.
- 2.38 There are different types of special architectural and historic interest that contribute to a Conservation Area’s significance. These include:
- Areas with a high number of nationally designated heritage assets and a variety of architectural styles and historic associations;
  - those linked to a particular industry or individual with a particular local interest;
  - where an earlier, historically significant, layout is visible in the modern street pattern;
  - where a particular style of architecture or traditional building materials predominate; and,
  - areas designated on account of the quality of the public realm or a spatial element, such as a design form or settlement pattern, green spaces which are an essential component of a wider historic area, and historic parks and gardens and other designed landscapes, including those included on the Historic England Register of parks and gardens of special historic interest.
- 2.39 With regard to the setting of conservation areas the guidance makes clear that heritage assets can gain significance from their relationship with their setting and that views from within or outside an area form an important way in which its significance is experienced and appreciated. It clarifies that views may relate to approaches along historic routes or visual connections between different areas that illustrate an important historic relationship, such as between a village and its surrounding agricultural landscape, or from an area of workers’ housing and the factory or extractive landscape that was a source of employment. In other cases a relationship may be part of a formal design, such as a designed view from a park or garden to a feature in the landscape beyond.
- 2.40 The guidance suggests the following factors which may be significant contributors to character:
- Views of rivers, the sea and surrounding hills and glimpses of landscape from urban streets
  - Open spaces, church towers and prominent public buildings that provide landmarks in views or views that illustrate a particular element of the area’s historic development
  - Groups of buildings, both those with a degree of conscious design or with recognised fortuitous beauty and the consequent visual harmony or congruity of development
  - Townscape attributes such as enclosure, definition of streets and spaces and spatial qualities as well as lighting, trees, and verges, or the treatments of boundaries or street surfaces
  - A uniform building height resulting either from past influences or planning restrictions that contribute to the character of views
  - Distant views of the settlement and those in the approach to it
  - Adjacent or nearby heritage assets that gain or contribute significance through views to or from the area
  - Nearby areas of recognised landscape character value such as Areas of Outstanding Natural Beauty (AONBs) or Areas of High Landscape Value, where penetrating or abutting the built-up area, should also be noted and explained.

## HEAN12: Statements of Heritage Significance: Analysing Significance in Heritage Assets (October 2019)

- 2.41 The purpose of this advice note is to provide information on how to assess the significance of a heritage asset. It also explores how this should be used as part of a staged approach to decision-making in which the assessment of significance precedes the design of the proposals.
- 2.42 The document illustrates that the first stage in the process to identify the significance of a heritage asset is to understand its form and history. This includes the historical development of a building or site, an analysis of surviving fabric or features and an analysis of the setting, including the contribution that the setting makes to significance.
- 2.43 Historic England describes heritage interest within the same context as set out in the NPPF and PPG. These are archaeological interest, architectural interest, artistic interest and historic interest. The guidance advises that assessments should describe the likely impact of development proposals and the way in which they may affect significance. It also states that efforts should be made to minimise harm to significance through the design process, with justification given to any residual harm.

### Local Planning Policy

- 2.44 In considering any planning application for development, the planning authority will be mindful of the framework set by government policy, in this instance the NPPF, by current Development Plan Policy and by other material considerations.
- 2.45 The local planning context is currently prescribed by Milton Keynes Council.

### Plan:MK 2016 – 2031 (Adopted March 2019)

- 2.46 Plan:MK sets out the Council's strategic approach to managing growth and development up to 2031. It is now a part of the development plan for the Borough. The plan contains the following policies which are relevant to built heritage and the current application:

#### Policy SD12: Milton Keynes East Strategic Urban Extension

- 2.47 A. Land is allocated at Milton Keynes East – as shown on the Key Diagram and Policies Map – for a comprehensive new residential and employment development to meet the long-term needs of Milton Keynes. Development can commence once the necessary strategic infrastructure required to make the site deliverable is funded and is being delivered. In that circumstance, the development of the site will be allowed to proceed within the plan period as an additional source of housing and employment land supply.
- 2.48 B. Development will be brought forward in line with all relevant policies in Plan:MK, particularly Policies SD1, SD9, SD10 and INF1. A comprehensive development framework for the site will be prepared in accordance with Policies SD1, SD9, SD10 and INF1 and approved by the Council prior to planning permissions being granted.
- 2.49 C. The development framework and subsequent applications for planning permission will establish the quantum and form of development in more detail, but proposals for development will be expected to meet the following criteria (inter alia):
- Be informed by appropriate surveys of archaeology, built heritage and ecology with appropriate mitigation of impact as consistent with other policies of the Plan and the NPPF.

#### Policy HE1 Heritage and Development

- 2.50 A. Proposals will be supported where they sustain and, where possible, enhance the significance of heritage assets which are recognised as being of historic, archaeological, architectural, artistic, landscape or townscape significance. These heritage assets include:
1. Listed Buildings;
  2. Conservation Areas;
  3. Scheduled Ancient Monuments and non-designated Archaeological sites;
  4. Registered Parks and Gardens;
  5. Assets on the MK New-Town Heritage Register; and
  6. Other places, spaces, structures and features which may not be formally designated but considered to meet the definition of 'heritage assets' as defined in Annex 2 of the NPPF.
- 2.51 B. Where appropriate, development proposals must provide an impartial and objective heritage assessment. Where necessary, the Council will require suitably qualified specialists to undertake the heritage assessment. The heritage assessment shall:
1. Assess and describe the significance of the heritage assets affected, identifying those elements that contribute to that significance and, where appropriate, those that do not. The level of detail shall be proportionate to the asset's importance and no more than is sufficient to understand the potential impact of proposals on their significance. Limited and localised alterations to an unlisted building in a conservation area need not be supported by the level of detail required to convey the impact on significance caused by development in the setting of a listed building or by proposed alterations to the built fabric of a listed building.
  2. Be of an analytical and interpretive nature rather than simply provide a description of the assets and the proposed works.
  3. Provide a sound justification for the works, based on the economic, social and environmental benefits delivered by the scheme, for example, promoting the long term care for a heritage asset and/or its setting.
  4. Explain how the scheme has taken account of the significance of the assets in its scope, design and detail, in order to minimise or avoid harm to the heritage assets affected.
  5. Assess the nature and extent of any harm or public benefit arising from the scheme.
  6. Where harm is caused by the proposal, the assessment shall explain why such harm is unavoidable or required to deliver public benefits that outweigh the harm caused.
- 2.52 D. Granting of permission for proposals that result in substantial harm to or total loss of the significance of a designated heritage asset will only be exceptional or wholly exceptional in accordance with national policy and guidance.
- 2.53 E. Permission for proposals that cause less than substantial harm to a designated heritage asset will only be granted where the harm is demonstrably outweighed by public benefits delivered by the scheme.
- 2.54 F. Proposals that result in harm to the significance of non-designated heritage assets will be resisted unless the need for, and benefits of the development clearly outweigh the harm, taking into account the asset's significance and importance, and only once all feasible solutions to avoid and mitigate that harm have been fully implemented.
- 2.55 G. In assessing any potential harm or enhancement to the significance of a heritage asset(s) the following will be considered: 1. Avoiding successive small scale changes that lead to a cumulative loss or harm to the significance of the asset or historic environment; 2. Respecting the character, appearance, special interest and setting of the asset and historic environment; 3. Retaining architectural or historic features which are important to the character and appearance of the asset

(including internal features) in an unaltered state; and 4. Retaining the historic form and structural integrity of the asset.

## **Milton Keynes East Strategic Urban Extension, Development Framework Supplementary Planning Document (March 2020)**

2.56 The Milton Keynes East Development Framework was adopted by the Cabinet of Milton Keynes Council on 10 March 2020 following a call-in of the decision to adopt the SPD on 13 January 2020. The SPD provides guidance on how the allocation of Milton Keynes East (Policy SD12 and other relevant policies) within Plan:MK should be planned and developed. The SPD is an important material consideration when determining relevant planning applications.

2.57 The SPD makes the following conclusions with regard to built heritage and the allocated site:

- Development should not adversely affect the setting of the heritage assets within or on the edge of the site, particularly Caldecote Mill, the hotel within the site and the Grade I listed Church of St Mary in Moulsoe.
- Masterplanning of the site should protect the integrity and character of Moulsoe village, and be respectful of the character of other adjoining areas, such as parts of Newport Pagnell close to the site. Given the level of enclosure separating it from adjacent areas, and given the scale of MKE, the development has an opportunity to create a unique character of its own.

## **Local Planning Guidance**

### **Broughton Conservation Area Review (October 2009)**

2.58 Broughton Conservation Area was designated on 8 February 1978. The Broughton Conservation Area Review provides an analysis of the conservation area's architectural importance, character and appearance. It additionally includes a management plan section, which outlines the Council's approach to managing change within the conservation area.

2.59 With regard to the conservation area's setting, the document identifies that views of the church tower or views of housing that extends southwards out of the village contribute to its significance. It identifies the key vantage points from which views of Broughton can be gained are from the area around the junction of Ambergate with Tanfield Lane and then further west where the new bridge crosses Broughton Brook.

2.60 The guidance states that the village setting is enhanced by the Broughton Brook Linear Park which extends north from the new bridge, affording attractive views across the brook of which the church tower forms a focal point.

2.61 Of relevance to the application and proposals, the council state that they will seek to protect or enhance the key views that contribute to the character or appearance of the conservation area.



## 3 HISTORIC BUILT ENVIRONMENT APPRAISAL

### Historic Development

- 3.1 The Site currently presents as a collection of arable and pasture fields to the north of the M1, traversed by the linear features of London Road (the A509) and Newport Road, with few buildings contained within it. This appearance, however, belies a far more complex history of human settlement and activity, which is detailed within the Archaeological Desk Based Assessment, by RPS.
- 3.2 The 1768 Jeffrey's Map of Buckinghamshire reveals the Site surrounded by a rural landscape and scattered hamlets (Figure 4). The earliest surviving building within the Site is Moulsoe Buildings Farmhouse, also formerly known as Heathend Hall, located to the east of London Road. The property is first shown on the 1814-15 Ordnance Survey Drawing (Figure 6). During this time, London Road was the primary thoroughfare running through the local area, connecting the village of Broughton in the south with the important coaching centre of Newport Pagnell to the north.
- 3.3 The 1886 OS map (1:10,560) (Figure 7) reveals more detail about the layout of Moulsoe Farm, comprising a 3-sided courtyard range, with the detached farmhouse located in the middle of the open side to the west. The enclosed space is subdivided, with a small building located in the centre. There are also a number of outbuildings, located to the east of the main farmstead complex. A small brickworks site is shown further to the north of the Site, also on the eastern side of on London Road.
- 3.4 The 1899 OS map (1:10,560) (Figure 8) shows some change to the Moulsoe Farm complex, with a larger building now extant in the middle of the courtyard. The 1924 OS map (1:10,560) (Figure 9) shows little change to the farmstead, although there has been some demolition and reconfiguration of the outbuildings to the east. The 2002 OS map (Figure 13) shows alterations to the farmstead, in association with its conversion to a hotel. Changes undertaken at this time include works to the historic buildings and construction of a car park to the south of the farmhouse.
- 3.5 In addition to Moulsoe Farm, another farm is shown on historic maps further to the south of the Site, at Moulsoe Barn. It is labelled on the 1886 OS map (1:10,560) as Cottage Farm, with a gravel pit to the south west. In 1924 it is labelled as Waitworths Farm and in 1950 it has been renamed as Hermitage Farm. The farmstead was expanded in the second half of the twentieth century and exists as a functioning farm in the present day.
- 3.6 The construction of the M1 and subsequent expansion of Milton Keynes as a New Town during the second half of the twentieth century brought dramatic change to the Site's surroundings. London Road became severed by the new motorway, with Broughton isolated to the west on one side and the Site to the east on the other. The section of London Road contained within the Site consequently lost its identity as a primary thoroughfare and it has now become a local, secondary route.
- 3.7 During the late twentieth and early twentieth century, those settlements to the west of the Site at Willen and Broughton have become subsumed within the expanding suburbs of Milton Keynes.

### Site Description

- 3.8 The Site is located to the north east of the urban centre of Milton Keynes. It principally comprises a large irregularly shaped area of farmland, to the north east of the M1 motorway, the boundary of which partially follows existing field boundaries and extends as far north as the A422. The boundary includes sections of London Road (A509) and Newport Road to the north of the M1. The boundary extends south of the M1 to include Tongwell Street (V11) as far as Pineham Roundabout, as well as an additional area of land to the north and east of the Cotton Valley sewage treatment works.
- 3.9 The Site is approximately 362ha in size, comprising mainly of open agricultural and pastoral land. The Site is traversed on its approximate north/south axis by the A509 (London Road), with a

secondary road branching off to the north east towards Moulsoe (Newport Road). The agricultural fields are traversed by various trackways.

- 3.10 With regard to built environment the Site contains a farmstead at Hermitage Farm, formerly Cottage Farm. Further to the north are a pair of semi-detached residential properties at 27-29 London Road. None of these buildings are statutorily listed or identified within the local HER and as such are regarded as having no historic or architectural interest.
- 3.11 Towards the centre of the Site (but excluded from the boundary) is a Holiday Inn hotel, the principal building of which is statutorily listed at Grade II under the title of Moulsoe Buildings Farmhouse (and for consistency will be referred to as such in this report).

## Assessment of Heritage Assets

- 3.12 A study area has been identified as the basis for the identification and assessment of heritage assets, extending 500m from the Site boundary. This radius is considered to be a proportionate approach to the assessment, based upon an understanding of the Site, local topography, existing urban development and the nature of the proposed development.
- 3.13 There are no heritage assets within the Site boundary and there would therefore be no direct effects on heritage assets as a result of the proposed development. With regard to heritage assets identified within the study area, the proposed development has potential to alter their settings, i.e. the surroundings within which they are experienced.
- 3.14 The Site entirely surrounds (but does not include) one Grade II listed building, Moulsoe Buildings Farmhouse (currently a Holiday Inn). In addition to this listed building and within a study radius of 500m there are twenty-one listed buildings (three listed at Grade I and eighteen at Grade II), two conservation areas and three non-designated heritage assets recorded on the local HER. A map of heritage assets within the study area is provided at Figure 2. Whilst lying outside of this study area, the Grade II Registered Park and Garden at Campbell Park, Milton Keynes, is also appraised within this report as part of a comprehensive assessment, recognising its position in the landscape with longer distance views north eastwards towards the Site.
- 3.15 The NPPF defines 'significance' as 'the value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting.'
- 3.16 Historic England's 'GPA 3: The Setting of Heritage Assets' (March 2015, revised December 2017) provides a five step process to assess the impact of development within the setting of heritage assets. These steps are outlined below:
- Step 1: identify which heritage assets and their settings are affected;
  - Step 2: assess the degree to which these settings and views make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated;
  - Step 3: assess the effects of the proposed development, whether beneficial or harmful, on the significance or on the ability to appreciate it;
  - Step 4: explore the way to maximise enhancement and avoid or minimise harm; and
  - Step 5: make and document the decision and monitor outcomes.
- 3.17 This Built Heritage Baseline Assessment addresses Steps 1 and 2 of the guidance, identifying and assessing those heritage assets in the surrounding area whose setting and significance may be affected by the Development.

## Moulsoe Buildings Farmhouse, Grade II (List entry number: 1212914)

- 3.18 This Grade II listed building is surrounded by the Site on all sides, although itself remains outside of the Site boundary. It comprises a house dating from the late eighteenth or early nineteenth century, now converted to hotel use. The three-storey building (with half basement) is orientated westwards to face London Road and presents a three-bay elevation as its principal façade, arranged around a central entrance accessed via steps (Figure 17). Above the entrance is a fanlight. The fenestration comprises modern windows beneath flat gauged arches, with those to the third floor being smaller in size. The elevation is otherwise enlivened with a projecting plinth and bands to the first and second floors. The slate covered roof is hipped, with slight coved eaves and chimney stacks to the right. Either side of the main façade there are arched walls, concealing later buildings behind, which the statutory list description states are not of interest.
- 3.19 The significance of the listed building relates primarily to the architectural interest of its fabric and design, which is generally limited to its external appearance. Internally the building has been altered by its conversion to hotel use, although some historic features may remain. It has historic interest illustrating the pattern of settlement across the local landscape.
- 3.20 The setting of Moulsoe Buildings Farmhouse has become much altered from its historic context. In the present day it is experienced alongside later buildings associated with its hotel use and a large car park. A band of tree planting now separates the building from its wider surroundings, which protects it to some degree from the noise and vibration of heavy traffic moving along London Road but visually isolates the property. Despite the planting, the traffic noise remains intrusive to the experience of the listed building. Beyond the hotel complex, to the east are large agricultural sheds, dating from the late twentieth century. In light of these numerous modern changes, the immediate setting of Moulsoe Buildings Farmhouse now makes very little contribution to its significance as a historic, higher status residence and detracts from the manner in which this significance can be appreciated.
- 3.21 More broadly the surrounding network of fields (comprising the Site) continue to provide a visual sense of rurality, but any notion of rural tranquillity is entirely undermined by the noise and vibration of heavy traffic on London Road and the M1. As such, the wider setting of the listed building, including the Site, makes no more than a modest contribution to its significance.

## Moulsoe

- 3.22 The following heritage assets are located in Moulsoe, to the north east of the Site:
- Church of St Mary, Grade I (List entry number: 1212922)
  - First Thatch Cottage, Grade II (List entry number: 1289355)
  - Hillcrest Cottage, Grade II (List entry number: 1212919)
  - Wistaria Cottage, Grade II (List entry number: 1212920)
  - St Mary's Cottage, Grade II (List entry number: 1212921)
  - Screen Enclosing Carrington Graves to North East of Church of St Mary, Grade II (List entry number: 1212925)
  - The Rectory, Grade II (List entry number: 1212926)
  - Yew Tree Cottage, Grade II (List entry number: 1212854)
  - Tickford Park, Grade II (List entry number: 1125465)
  - Tickford Park Farmhouse, Grade II (List entry number: 1332206)
  - Bretigny Cottage, Grade II (List entry number: 1212856)

- Carrington Arms Public House, Grade II (List entry number: 1212858)
- End Thatch, Grade II (List entry number: 1289305)
- Moulsoe Glebe Farm barn, non-designated heritage asset (HER number: MKK5415)
- Moulsoe School, non-designated heritage asset (HER number: MKK5416)

#### *Church of St Mary*

- 3.23 The Church of St Mary is a Grade I listed church, comprising a chancel, nave with clerestory, aisle, south porch and a south west tower (Figure 18). The buildings dates from the fourteenth century but was restored in the nineteenth century by William Burges, at which point the chancel was rebuilt. The windows include tracery from a range of periods, with fourteenth century tracery to the aisle and nineteenth century tracery to the chancel. Whilst not assessed on site, the statutory list description describes the interior of the church, which includes a barrel-vaulted roof, medieval and nineteenth century fonts and a number of brasses and monuments.
- 3.24 The heritage significance of St Mary's relates to its special architectural and historic interest. Its architectural interest is derived from the age and quality of its fabric and its associated evidential value, which traces the evolution of the building over the course of centuries. Historic interest is derived from the association of the church with William Burges, a leading Victorian architect and proponent of the Gothic Revival style.
- 3.25 The immediate setting of the listed church relates to its churchyard and the monuments contained within it, one of which is Grade II listed in its own right (see below). Beyond these environs, its setting includes properties along Newport Road as part of the settlement of Moulsoe. The list description states that the church was partly listed for group value. Whilst it does not specify the other buildings with which it forms a group, it is likely that this relates to The Rectory and nearby timber framed buildings at Wistaria Cottage and St Mary's Cottage (all of which are listed at Grade II).
- 3.26 The church is positioned at a high point in the landscape, which drops down to the south, towards Milton Keynes. The tower features as a focal point on the horizon (Figure 19). The nature of the topography and position of Church Farm to the south, restrict views directly to the south, but views to the south east and south west remain broadly unimpeded. Short and mid-distance views in these directions include a rural setting of agricultural fields, bounded by hedgerows with intermittent bands of tree planting. Longer distance views include views of the M1 and the environs of Milton Keynes, which include large warehouses at Magna Park (which have been designed with graded colour tones to reduce visual impact). These views include some views of the Site, as part of the wider agricultural landscape (Figure 20).
- 3.27 The immediate setting of the churchyard and surrounding historic buildings in Moulsoe contribute positively to the setting of St Mary's. More broadly its elevated position in the landscape contributes positively to the way in which its significance is appreciated, acting as a focal point within Moulsoe and for the wider area. Those parts of the Site which feature in longer distance views from the church and which form part of the surrounding agricultural landscape contribute positively to the way in which the church's special interest is experienced as part of a rural settlement.

#### *Screen Enclosing Carrington Graves to North East of Church of St Mary, Grade II (List entry number: 1212925)*

- 3.28 This Grade II listed structure comprises a stone and iron screen enclosing the Carrington family plot, designed by William Burges c. 1870. It is embellished with heraldic shields, decorative finials and ornamental ironwork, all of which form part of its special interest. The setting of the screen relates most directly to the surrounding churchyard and St Mary's Church. The listing description confirms that it was partly listed for its group value. The position of the screen on the lower slope of the churchyard and surrounding tree planting is such that there is a degree of enclosure to its setting, although it remains visible from Newport Road and was clearly designed to be so. The Site forms

part of the wider surrounding rural landscape but it has no particular bearing on how this listed structure and its special interest is experienced.

*First Thatch Cottage*

- 3.29 First Thatch Cottage originally dates from the seventeenth century but was altered during the 1970s following a fire which destroyed the steeply pitched, thatched roof (now replaced). It comprises a Grade II listed timber framed building of one and a half storeys, with painted brick infill panels. The fenestration comprises casement windows, with attic windows to the gable ends. The list description describes that internally there is a stone inglenook fireplace, along with exposed posts and tiebeams.
- 3.30 The significance of First Thatch Cottage relates to its special architectural and historic interest. Architectural interest is derived from the age of its fabric and the evidential value contained within the timber frame about its construction and subsequent evolution. Historic interest is derived from its vernacular style, which reveals information about local building materials and historic local building techniques.
- 3.31 The setting of First Thatch includes, most immediately, its own gardens within which it is experienced as a domestic property. It is located in close proximity to another timber framed property at Hillcrest Cottage (Grade II), and other historic buildings further to the north around the church, which contribute positively to its setting and an understanding of its historic context. The statutory list description confirms that the property was partly listed for its group value. The landscape drops down considerably to the north of the property, which allows for wide panoramic views to the north, north west and west (Figure 21). These views include some areas of the Site, appearing as part of the wider landscape of agricultural fields surrounding the village. These views of the Site contribute positively to the setting of the listed cottage, by virtue of their rural character.

*Hillcrest Cottage*

- 3.32 Hillcrest Cottage is a Grade II listed timber framed cottage with painted brick infill panels, dating from the seventeenth century in origin but with later alterations. The property has a central two storey section, flanked by single storey elements, all of which is set at a right angle to Newport Road. The roofs are all thatched, with a brick chimney to the taller section.
- 3.33 The heritage significance of Hillcrest Cottage is derived from its special architectural and historic interest. This architectural interest relates to the age and construction of its timber frame, which reveals information about the building's construction and how it has evolved over the course of centuries. Historic interest is derived from the vernacular style of the building, revealing information about historic local building practices and materials.
- 3.34 The immediate setting of Hillcrest Cottage relates to its gardens, within which it is experienced as a domestic residential property. Beyond its gardens, the cottage is experienced alongside historic buildings in Moulsoe including First Thatch (Grade II) in some proximity. This group value is confirmed within the list description. The drop in the landscape to the north allows for wide panoramic views, which reveal parts of the Site as part of the agricultural landscape to the north west. These views (including views of the Site in this direction) contribute positively to the setting of the listed cottage, revealing its identity as part of a rural village.

*Wistaria Cottage*

- 3.35 This Grade II listed cottage includes fabric dating from as early as the sixteenth century, with later alterations. It has a timber framed construction with painted brick infill panels, positioned at a right angle to Newport Road. The original thatch has been replaced with a tiled roof, with three flat topped eaves dormers to the western elevation and one to the eastern elevation. The list description states that internally there is exposed timber framing, a large stone chimney stack with inglenook at ground floor level and a fireplace on first floor, both with heavy chimney beams.
- 3.36 Wistaria Cottage has special architectural and historic interest, derived from the age and evidential value of its timber frame, which reveals information about how it was built and how it has changed

over time. As a vernacular building it has historic interest for the information it reveals about local building materials and practices.

- 3.37 The immediate setting of Wistaria Cottage extends to its gardens as a domestic property. Beyond its domestic surroundings, the setting of this listed building includes other historic buildings in Moulsoe, particularly those in proximity to the Church of St Mary. The position of the cottage at the top of an escarpment allows for wide ranging views over agricultural land to the north, north west and west, which may include some areas of the Site, although views in this direction are screened to some degree by mature garden boundary planting. Views of the agricultural landscape contribute positively to the setting of the listed building, assisting an understanding of its context as part of a historic, rural village.

*St Mary's Cottage*

- 3.38 St Mary's Cottage lies to the north of the Church of St Mary. It comprises a seventeenth century timber framed cottage of one and a half storeys, with later alterations. The framing is largely concealed by the application of external render. The roof is thatched with a central brick chimney and attic dormer windows.

- 3.39 The special interest of St Mary's Cottage relates to the architectural interest of its fabric, in terms of its age, but also the evidential information it embodies demonstrating changes to the building since its original construction. It has historic interest as an example of the local vernacular style.

- 3.40 The setting of St Mary's Cottage includes its gardens most immediately, but it also exists in some proximity to St Mary's Church and Wistaria Cottage as part of a historic group. The listing description confirms that the property was partly listed for its group value. St Mary's Cottage is similar to Wistaria Cottage in its elevated position, with long distance views to the north, north west and west, which may include views of agricultural fields contained within the Site. These views contribute positively to the setting of St Mary's Cottage, as part of the wider landscape which provides context to the rural village of Moulsoe. These views are screened to some degree by adjacent development at Church House.

*The Rectory, Grade II (List entry number: 1212926)*

- 3.41 The Rectory is an eighteenth century house, with nineteenth century alterations. It is constructed in stone, with a tiled and hipped roof. Its two-storey principal façade of three bays is arranged symmetrically around a central entrance. The significance of the house is derived from its special architectural and historic interest, part of which relates to its design as an example of polite architecture. The setting of the property includes its generously sized gardens as well as the adjacent Church of St Mary, with which it has both spatial and functional associations. The degree of boundary planting around the house is such that it is experienced within very enclosed surroundings. The lack of longer distance views is such that the Site does not contribute to the way in which the significance of the listed building is experienced, beyond forming part of the wider landscape which reveals its position as part of a rural village.

*Yew Tree Cottage, Grade II (List entry number: 1212854)*

- 3.42 Yew Tree Cottage lies to the eastern end of Moulsoe, where the landscape drops down from the high point at St Mary's Church. It is a seventeenth century, timber framed house with later alterations. The roadside facing element is two and a half storeys in height, with a range to the rear of one and a half storeys. Both roofs are thatched. The significance of Yew Tree Cottage relates to its special architectural and historic interest. The timber frame embodies information about the building's construction and evolution and it has historic interest as an example of the local vernacular.

- 3.43 The setting of the house includes its gardens and the adjacent road, where it forms a prominent building surrounded by later development. The Site does not contribute to the setting of Yew Tree Cottage, being located further to the west on the far side of the hill.

*Tickford Park, Grade II (List entry number: 1125465)*

- 3.44 The National Heritage List for England records Tickford Park as being located within an area of woodland to the north of Moulsoe. It is not visible from public footpaths and so the following description is based upon the statutory listing description, written when the property was listed in 1972.
- 3.45 The earliest parts of the property date from the sixteenth century but it was much altered during the early nineteenth century in a cottage orne style. It presents a colour washed brick exterior of two storeys (with attic) with patterned tiled roof, rising above a corbelled cornice and eaves level band. A nineteenth century two storey wing connects to a sixteenth century block of two storeys, which is timber framed with the first floor oversailing on exposed corbels.
- 3.46 The heritage significance of Tickford Park appears to relate to the considerable age of its fabric and the complexity of its evolution over the course of a number of centuries. Its timber frame would contain evidential value to inform this understanding.
- 3.47 The area of dense woodland surrounding Tickford Park comprises the listed building's principal setting. Beyond the wooded area the wider rural landscape reinforces an understanding of the property's historic context, which includes areas of the Site to the west. This spatial relationship is more appreciable with reference to cartographic sources, however, rather than as experienced from the listed building itself.

*Tickford Park Farmhouse, Grade II (List entry number: 1332206)*

- 3.48 Tickford Park Farmhouse is not visible from a public footpath or highway. As such the following description is based upon the particularly sparse statutory listing description, which describes it as a two storey property dating to the eighteenth century or earlier, in brick and red tile, with casements and glazing bars.
- The special interest of this listed building appears to relate to the age of its fabric and its historic interest as a historic farmhouse. Given its use as a farmhouse the farmyard and rural surroundings contribute positively to its setting and significance, along with any surviving historic ancillary buildings. The Site lies to the west of the listed building. Views towards the Site appear to be restricted by dense boundary planting around the farmhouse.

*Bretigny Cottage, Grade II (List entry number: 1212856)*

- 3.49 This Grade II house dates from the sixteenth and seventeenth centuries, with later additions. It is a timber framed property with white painted brick infill. The roof comprises a mix of tiles and thatch, with irregular brick chimneys.
- 3.50 The heritage significance of Breitigny Cottage is derived from its special interest, not least relating to the considerable age of its fabric and the evidential value contained within its timber frame. It has further historic interest as part of the historic settlement of Moulsoe and the former village post office and store.
- 3.51 The setting of this listed building includes adjacent properties of varying dates and forms, as well as Newport Road. Whilst contemporary historic properties contribute to the setting of the listed building for the way in which they collectively illustrate the historic appearance of Moulsoe, Bretigny Cottage derives only a limited degree of its significance from its setting. This is due to the degree of modern development in close proximity, as well as the busy and urbanised nature of the road.
- 3.52 The Site lies to the west of Bretigny Cottage, without any inter-visibility between the two areas. This is due to the particular local topography, which rises to a peak around the Church of St Mary and then drops down to the east, with the listed building positioned on its lower slopes on the far side of the village from the Site. The Site forms part of the listed building's wider rural surroundings in its broadest sense, but any contribution to its setting and significance is minimal given the distance between the two areas and lack of inter-visibility.

*Carrington Arms Public House, Grade II (List entry number: 1212858)*

- 3.53 The Carrington Arms Public House dates from c1860, built in the style of William Burges who worked for Lord Carrington at Moulsoe Church. It is constructed in brick with stone dressings, rising two storeys above a plinth, with a first floor stone string course. The roof is steeply pitched and tile covered, with ornamental ridge, brick chimney and, stone gable copings. The principal elevation includes two full height canted bay windows, with chamfered stone mullioned leaded windows, with blank trefoil arched heads at ground floor level. These windows flank a central stone arched door with tiled pentice above. To the right is a further section with a wider stone arched doorway.
- 3.54 The special interest of this listed building is derived from the architectural interest of its form and detailing as well as its historic interest as a purpose built public house. Its setting relates primarily to its grounds, ancillary buildings and car park, as well as the main road. Modern development to the west has reduced the sense of rurality as part of the building's surroundings.
- 3.55 The Site lies far to the west of the public house, without any inter-visibility between the two areas. This is due to the local topography, which rises to a peak around the Church of St Mary and then drops down to the east, with the Carrington Arms positioned on its lower slopes on the far side of the village from the Site. The Site forms part of the listed building's wider rural surroundings in its broadest sense, but any contribution to its setting and significance is minimal given the distance between the two areas and lack of inter-visibility.

*End Thatch, Grade II (List entry number: 1289305)*

- 3.56 End Thatch is a seventeenth century cottage with later alterations. It comprises a timber framed building of two storeys (and attic), with painted brick exterior. The thatched roof is half hipped to the right and is carried down over a lean-to on the left. The statutory listing description states that internally there is a large stone chimney stack with inglenook in the central room, with heavy spine beams and exposed timber framing.
- 3.57 The special interest of this cottage relates to the age of its fabric and the evidential value contained within its timber frame. It derives historic interest as part of the historic settlement of Moulsoe.
- 3.58 The setting of End Thatch relates to adjacent properties at the end of Wood End Lane as a small group. The listed building's removed position, set back from the main road preserves a greater sense of the cottage's rural setting which contributes positively to its significance.
- 3.59 The Site lies far to the west of End Thatch, without any inter-visibility between the two areas. This is due to the local topography, which rises to a peak around the Church of St Mary and then drops down to the east, with the Carrington Arms positioned on its lower slopes on the far side of the village from the Site. The Site forms part of the listed building's wider rural surroundings in its broadest sense, but any contribution to its setting and significance is minimal given the distance between the two areas and lack of inter-visibility.

*Moulsoe Glebe Farm barn, non-designated heritage asset*

- 3.60 Moulsoe Glebe Farm is identified on the local HER and is therefore regarded as a non-designated heritage asset for the purposes of this assessment. It comprises a small, three bay timber framed barn with an outshut to the north, located to the north of the main farmhouse. The building was partly rebuilt in brick during the eighteenth century and it was later extended to create a new aisle. The HER entry states that the roof is comprised of two tie-beamed trusses with queen struts. The barn has a local level of significance, relating to its age and surviving, but altered, historic fabric.
- 3.61 The setting of the barn is derived most directly and positively from the farmstead in which it forms a part and with which it shared historic and functional associations. Adjacent historic buildings in Moulsoe provide some wider context, collectively illustrating the historic appearance of the settlement. The Site forms part of the wider surrounding rural landscape, but it makes only a limited contribution to the manner in which the local interest of the barn is appreciated given the lack of inter-visibility and position further to the east of the village.



*Moulsoe School, non-designated heritage asset*

3.62 Moulsoe School comprises a nineteenth century school and schoolhouse, now converted into a private residence with some later alterations. It has a local level of heritage significance, relating primarily to its historic function as a school and its typical schoolhouse architecture, albeit now in an altered state. The close setting of Moulsoe School has been altered considerably with the construction of modern properties in some proximity on either side in the late twentieth century. More positively, the setting of the former school includes historic properties in the centre of Moulsoe, which provide some historic context to the building. Panoramic views to the north and north west may reveal distant views of the Site, which forms part of the wider rural landscape and which positively contributes to its setting and local significance.

## Willen

3.63 The following heritage assets at Willen fall within the study area:

- Church of St Mary Magdalene, Grade I (List entry number: 1160998)
- Wall Surrounding Church Yard with Gates at East and West Ends, Grade II (List entry number: 1125231)
- Willen War Memorial Obelisk, Grade II (List entry number: 1458606)
- School House, Grade II (List entry number: 1161013)
- Brook Farmhouse, Grade II (List entry number: 1125232)
- The Hospice of Our Lady and St John, Grade II (List Entry number: 1332332)
- Willen Conservation Area

3.64 The listed buildings in Willen are concentrated around the Church of St Mary Magdalene and the triangular green located next to it. School House fronts onto this space from the north, in the middle of which is the Willen War Memorial Obelisk. Brook Farmhouse is located to the south east. All of these listed buildings and structures are located within the Willen Conservation Area.

3.65 The **Church of St Mary Magdalene** dates from 1678, built by Robert Hooke. It comprises a west tower, nave and a nineteenth century apse, all executed in red brick with stone dressings, plinth coping, chamfered quoins and cornices. Stone is also used for architraves and cills to the windows. The tower is of two stages, flanked by one storey sections, with parapets swept up to the tower and decorative stone pineapple-style finials. The lower stage of the tower houses a recessed west entrance accessed via a flight of semi-circular steps. There are stone Corinthian pilasters to the corners of the upper stage of the tower, supporting an entablature and parapet with decorative finials to the corners. The church's fenestration includes tall arched windows to the north and south of the nave, with bulls eye window to the eastern tympanum of the nave. The list description describes the interior, which includes elaborate plaster decoration, a panelled dado and pews, as well as a font, pulpit and reading desk. The heritage significance of the church is derived from its special architectural and historic interest as a statutorily listed building. This significance relates to the interest of its architectural design and association with Robert Hooke, a prominent scientist and architect during the seventeenth century.

3.66 The church is enclosed within a low brick **churchyard wall** (Grade II), which is contemporary with the original church in the late seventeenth century. This wall curves up to gate piers at the eastern and western sides of the church, which comprise large square brick piers with moulded stone cornice cappings and ball finials. The heritage significance of the wall relates to its age and architectural form, as well as its historic association with the Church of St Mary Magdalene.

3.67 In the middle of the triangular green is the **Willen War Memorial Obelisk** (Grade II). It has historic interest for its association with events of the First World War, which it commemorates. Architectural interest is derived from its survival in an unaltered state from its original design.

- 3.68 To the north of the green is **School House** (Grade II), which dates from 1847. It comprises a single storey, red brick former school, with stone dressings, tiled roof and two brick chimneys. The Tudor arched main entrance is housed within a shallow gabled projection with stone bellcote above.
- 3.69 **Brook Farmhouse** (Grade II) dates from the seventeenth century, with eighteenth and nineteenth century alterations. The earlier sections are built with rubble stone, and nineteenth century work is executed in brick. The building is two storeys in height. The roof is half hipped at the eastern end and covered with historic tiles. The fenestration includes timber mullioned and transomed windows with glazing bars to the northern elevation. The main entrance is embellished with architrave surround and flat hood. The property has special architectural and historic interest, derived from the age of its fabric and its evolution over various building phases.
- 3.70 The **Hospice of Our Lady and St John** (Grade II) is a former house dating from the eighteenth century and altered in the nineteenth century. It has special architectural and historic interest, relating to its fabric and the information it reveals about local building practices. The listed building is surrounded by many later buildings associated with its more recent role as a hospice.
- 3.71 As a group of historic buildings, of varying ages, uses and forms, the listed buildings in Willen contribute positively to the settings of each other, revealing information about how the former village developed over the course of centuries before it was subsumed by the expansion of Milton Keynes during the second half of the twentieth century. Excepting Brook Farmhouse and the Willen War Memorial Obelisk, all of the listed buildings are identified within their statutory list descriptions as having group value with each other. Despite the enclosing twentieth century townscape, the verdant environment around the green and in adjacent gardens creates a degree of tranquillity and provides insight into the settlement's former rural character. In this way the close settings of the listed buildings contribute positively to the way in which their significance can be appreciated.
- 3.72 The **Willen Conservation Area** is drawn to include the above group of buildings and green spaces between them. It is a very distinct and concentrated conservation area, ringed to the north and east by later twentieth century development and by Willen Lake (and park) to the south and west. The conservation area derives its character and appearance from the limited amount of good quality built environment contained within it, experienced alongside highly verdant surroundings. These environs preserve a sense of Willen's historic character as a once isolated, peaceful, rural hamlet. The setting of the conservation area, comprising twentieth century townscape, makes no contribution to its significance, other than to demonstrate the nature of twentieth century urbanisation.
- 3.73 The Site lies mostly to the north of M1, separated from this group of listed buildings and the conservation area by the major thoroughfare and modern development. There are no views between the two areas. Whilst historically the Site and Willen formed part of a shared rural landscape, now severed by the M1, there are no specific or direct associations between the two areas.

## Broughton

- 3.74 The following heritage assets at Broughton fall within the study area:
- Church of St Lawrence, Grade I (NHLE ref: 1332313)
  - The Old Rectory, Grade II (NHLE ref: 1160062)
  - Broughton Conservation Area
- 3.75 Once an independent rural estate village, Broughton now exists on the eastern fringe of Milton Keynes. It is reached via the old London Road, around which the houses and church loosely cluster in a linear manner. Now cut off by the A5130 (and more widely by the M1) the village is experienced as a small enclave of historic buildings, subsumed within later twentieth century development. Despite these much altered environs the enclosed nature of the conservation area creates a strong sense of tranquillity, although does not accurately reflect the history of Broughton as a settlement once located along a major route.

- 3.76 The focal point of the conservation area is the village green, next to the fourteenth century Church of St Lawrence (Grade I). The seventeenth century Old Rectory, to the north of the church, is listed at Grade II. Across the conservation area there is a general consistency of appearance across the residential properties, due in part to a short but significant period of investment by the local Tyringham family. These properties tend to be smaller cottages or larger villas of brick construction, facing onto the road and either detached or semi-detached in form. Aside from the church, the former schoolhouse is one of the few non-residential buildings, although it has since been converted to residential use.
- 3.77 The green represents the principal green space of the conservation area, although grassed verges and mature garden planting similarly contribute to creating an attractive verdant appearance, particularly to the north of the conservation area. The green is prominently framed on one side by the red brick wall of The Old Rectory; lower brick walls to smaller properties characterise much of the conservation area as a whole.
- 3.78 The significance of the conservation area as a whole is derived from the quality of its built environment and verdant environs, as well as historic interest from having been developed over a relatively short period by a prominent local family.
- 3.79 Attractive views of the conservation area and the church may be found from the Broughton Brook Linear Park to the north of the bridge, looking north-eastwards, and these views contribute positively to the way in which its significance is experienced. The setting of the conservation area from the east and north has been affected by the presence of the A5130 and modern development, which do not contribute positively to conservation area's significance.
- 3.80 The Site lies primarily to the north of the M1, separated from the conservation area and listed buildings by the major thoroughfare and modern townscape. There is no inter-visibility between the two areas. Whilst historically the Site and Willen formed part of a shared rural landscape, now severed by the M1, there are no specific or direct associations between the two areas.

### **Cambell Park, Milton Keynes, Grade II Registered Park and Garden (List entry number: 1467405)**

- 3.81 Campbell Park is a Grade II registered park and garden located to the north east of Milton Keynes town centre. Since Milton Keynes New Town was designated in January 1967 there were intentions to include parkland in this location around the Grand Union Canal. Proposals for the parkland went through various iterations over the following years, but the eventual design was the product of a design of 1973-1975 by Derek Walker, Stuart Mosscrop and Andrew Mahaddie, revised by Neil Higson around 1980. The park was opened in 1984 and has broadly survived unaltered to the present day.
- 3.82 One of the most notable features of the Site is the distinctive central ridge, which was partly shaped by the tipping of spoil from construction of the New Town's town centre. This ridge terminates in the Belvedere as a high point in the landscape. From the ridge the land drops steeply to the north into a dry valley; lower down to the north east the valley runs into a stream, which follows the north side of the park where there is an area of more formalised gardens. To the south of the Belvedere, the landscape drops into a slightly shallower valley, where a wooded ridge runs along the southern boundary of the Site.
- 3.83 Other features of the park include a cricket pitch and an open-air auditorium. The park also incorporates a series of sculptures from the 1990s onwards by noted artists. Many of the sculptures are tall and provide prominent features in the landscape as well as being works of art. Their scale and setting are reminiscent of obelisks, urns or figurative sculpture in eighteenth century landscape design.
- 3.84 The registered park has historic interest as one of the largest parks to be laid out in England in the twentieth century, drawing upon eighteenth and nineteenth century landscape influences as part of

a contemporary modern design. The layout was also notable for the way in which it accommodated the Grade Union Canal and the existing natural landscape around the River Ouzel, with a large central area of pastoral landscape. The park's quality of design is reflective of the values and wider social history of Milton Keynes as a New Town, as well as the fundamental planning principles which guided its masterplanning.

- 3.85 With regard to the park's setting, the statutory listing description states that the park forms the eastward extension of the town centre, describing how the sites to the north and south were intended for high-value projects that would provide a worthy frame to the park, but are still only partly developed. The list description further acknowledges the group value of the park alongside the Shopping Building, Midsummer Boulevard, which shares its sense of scale and generous use of space, and the Central Library, Silbury Boulevard (both Grade II).
- 3.86 From the park there are views west to the city with its skyline of modern buildings. There are additionally long distance views to the north-east towards the Site and the landscape beyond the M1. These views towards the Site contribute to the setting and significance of the registered park for the way in which they illustrate the relationship of Milton Keynes with the wider countryside, providing some insight into the nature of the local context prior to the designation and construction of the New Town.

## **Cotton Valley Sewage Treatment Works, Pineham, Non-Designated Heritage Asset**

- 3.87 Construction of the Cotton Valley treatment plant at Pineham began in the late 1960s. It contains a group of historically important buildings in the Modernist style, set within verdant landscape surroundings. In this way it reflects the fundamental planning and design principles which have shaped Milton Keynes New Town.
- 3.88 The sewage works form part of an inward looking site which is intentionally screened on some sides. It has no material visual or spatial relationship with other external buildings or sites, either through being appreciated in proximity or through direct views.
- 3.89 The vast majority of the Site lies to the north of the M1. Where a small section drops down to the south of the M1 the boundary wraps around the northern and eastern edges of the sewage works. The inward looking nature of the sewage works is such that the Site makes no more than a minor contribution to its setting and significance.

## **Scoping Exercise**

- 3.90 After undertaking two site assessments a number of heritage assets could be excluded from further detailed appraisal, based upon the significance of the heritage assets, the distance they are located from the Site and the nature of intervening landscape, which would prevent inter-visibility with the proposed development. In addition, there are no known direct historic or cultural associations between the heritage assets identified below and the Site. The following heritage assets were consequently scoped out from further detailed assessment:

### **Moulsoe**

- Yew Tree Cottage
- Bretigny Cottage
- End Thatch
- Carrington Arms Public House

### **Willen**

- Church of St Mary Magdalene, Grade I (List entry number: 1160998)

- Wall Surrounding Church Yard with Gates at East and West Ends, Grade II (List entry number: 1125231)
- Willen War Memorial Obelisk, Grade II (List entry number: 1458606)
- School House, Grade II (List entry number: 1161013)
- Brook Farmhouse, Grade II (List entry number: 1125232)
- The Hospice of Our Lady and St John, Grade II (List Entry number: 1332332)
- Willen Conservation Area

### **Broughton**

- Church of St Lawrence, Grade I (NHLE ref: 1332313)
- The Old Rectory, Grade II (NHLE ref: 1160062)
- Broughton Conservation Area

## 4 PROPOSALS AND ASSESSMENT OF IMPACT

### Proposals

- 4.1 The Milton Keynes Local Plan, Plan:MK (adopted March 2019) allocates a large part of the Site to the north of the M1 for a mixed residential and employment development, as part of the Milton Keynes East Strategic Urban Extension.
- 4.2 Proposals for the Site comprise:
- “Hybrid planning application encompassing:*
- (i) outline element (with all matters reserved) for a large-scale mixed-use urban extension (creating a new community) comprising: residential development; employment including business, general industry and storage/distribution uses; a secondary school and primary schools; a community hub containing a range of commercial and community uses; a new linear park along the River Ouzel corridor; open space and linked amenities; new redways, access roads and associated highways improvements; associated infrastructure works; demolition of existing structures and*
- (ii) detailed element for strategic highway and multi-modal transport infrastructure, including: new road and redway extensions; a new bridge over the M1 motorway; a new bridge over the River Ouzel; works to the Tongwell Street corridor between Tongwell roundabout and Pineham roundabout including new bridge over the River Ouzel; alignment alterations to A509 and Newport Road; and associated utilities, earthworks and drainage works.”*
- 4.3 The proposals are supported with the following parameter plans:
- Land Use
  - Movement and Access
  - Green Infrastructure
  - Building Heights
- 4.4 The residential areas of the proposed development would be brought forward as part of a phased construction programme, as follows:
- Phase 1 – 2025 to 2030
  - Phase 2 – 2031 to 2037
  - Phase 3 – 2038 to 2048
- 4.5 Those areas of the Site in closest proximity to Moulsoe Buildings Farmhouse would be brought forward as part of Phase 2 (to the north) and Phase 3 (in other directions).
- 4.6 The residential areas of the Site proposed in closest proximity to built heritage assets in Moulsoe would be brought forward as part of Phase 3, with more distant land proposed for employment use provided as part of Phase 2. Full details of the phased construction programme are provided separately as part of the planning submission.

### Pre-Application Discussions

- 4.7 The proposed development has been brought forward further to pre-application consultation with Milton Keynes Council (meetings on 27 August 2020 and 2 February 2021). The Built Heritage Baseline Assessment was presented during these discussions and the scope of the study area was agreed with the council’s conservation officer. Draft parameter plans were additionally presented for discussion and comments were fed into the final parameter plans.
- 4.8 Milton Keynes Council responded to the EIA scoping opinion (dated 30th November 2020) as follows:

“The approach for the Heritage Assessment, in particular taking into account the listed buildings in Moulsoe and the Grade II listed Holiday Inn building, is agreed. The potential impacts on those assets should be considered as part of the LVIA work, and further discussions should continue with the Council’s Conservation Officer.”

- 4.9 Historic England provided a consultation response in relation to the EIA scoping opinion (2 November 2020) and declined to comment, stating:

“This application should be determined in accordance with national and local policy guidance, and on the basis of your expert conservation advice.”

- 4.10 Historic England were separately approached for pre-application comments regarding the draft parameter plans and advice was provided (letter dated 3 March 2021, Appendix C). Historic England agreed with the broad findings of the draft Built Heritage Baseline Assessment, that there would be a degree of harm caused to the setting of St Mary’s Church, Moulsoe (in addition to other heritage assets in Moulsoe and Moulsoe Buildings Farmhouse). They additionally suggested a small number of other heritage assets for detailed assessment, although acknowledged that they had been unable to undertake a site visit. The conservation officer at Milton Keynes Council was approached for comment, to re-confirm the scope of assessment, as agreed during pre-application meetings.

## **Assessment of Impact**

- 4.11 In assessing potential effects of the proposed development the principal consideration is whether the significance of the identified heritage assets within the study area would be affected by changes within their settings, i.e. the surroundings in which the asset is experienced. The relevant legislation in this instance stems from s.66 of the 1990 Act, which states that in considering whether to grant planning permission for development which affects a listed building or its setting, the decision maker shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.
- 4.12 The NPPF makes clear that ‘elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or be neutral’. Potential effects of development in this instance relate primarily to visual effects, considering the nature of the proposed development (which would not cause additional noise, vibration or odour). Potential wider effects on setting (such as historic or cultural associations) have also been considered as part of this assessment.

## **Moulsoe Buildings Farmhouse, Grade II**

- 4.13 The location of this Grade II listed building, surrounded by the Site but positioned outside its boundary, is such that Moulsoe Buildings Farmhouse would experience considerable changes to its setting arising from the development of the Site, including some changes that would be regarded as enhancements.
- 4.14 The immediate setting of Moulsoe Buildings Farmhouse is much altered from its historic context, relating largely to its change of use from private domestic residence to a hotel, with various associated extensions and adjacent car park. There are also modern agricultural buildings to the east, which do not contribute positively to the setting of the listed building by virtue of their scale and proximity (although historically there were smaller outbuildings located in this area). In light of these modern changes it is considered that the immediate setting of Moulsoe Buildings Farmhouse does not contribute positively to the way in which its significance is appreciated.
- 4.15 Beyond the immediate environs of the hotel, the wider surroundings of the listed building (including the Site) remain broadly agricultural in character (although not without some minor alterations relating to the shifting of historic field boundaries). Whilst this visual association of the building within a rural context remains appreciable, it is no longer connected to the surrounding land in a functional

sense, the agricultural activity on the site having ceased. As such, the rural environs make a positive contribution to the setting and significance of the listed building, but this contribution is limited. The biggest intrusion to the listed building's surroundings is the more intensive modern usage of London Road, with associated noise and vibration from regular heavy traffic, including HGV lorries.

- 4.16 The area surrounding Moulsoe Buildings Farmhouse is proposed for residential use (Land Use Parameter Plan). This would include the demolition of modern farm buildings to the east of the listed building, which do not contribute to its setting or significance. It is recognised that the transformation of agricultural land to a developed state, would incur an inherent degree of harm to the setting and significance of the listed building. However, appropriate measures may be applied to mitigate the level of harm, through good design and layout. These design aspects would be addressed via a future reserved matters application.
- 4.17 The Green Infrastructure and the Movement and Access parameter plans shows a pedestrian pathway included to the north of Moulsoe Buildings Farmhouse, which would connect the proposed linear park to the west with eastern areas of the Site. At present, most people (unless visiting the hotel directly) drive past the listed building along London Road, from where it is barely visible and its significance cannot be appreciated in any meaningful way. The proposed pedestrian pathway therefore offers important new opportunities for pedestrians to acknowledge the building's existence and experience its significance as a listed building (within the limits created by conifer planting around the listed building and which lies outside of the Site).
- 4.18 The Movement and Access Parameter Plan proposes the downgrading of London Road, with heavy traffic directed to new routes across the wider Site. This downgrading of the road offers a considerable opportunity to enhance the setting of Moulsoe Buildings Farmhouse by reducing both the amount of traffic but also the nature of traffic which uses it. This would return a degree of tranquillity to the building's environs, more akin to its historic context in experiential terms.
- 4.19 In summary, whilst there will be considerable changes to the setting of Moulsoe Buildings Farmhouse arising from development, the parameter plans demonstrate that there would also be some important enhancements to its setting. In weighing the harmful and beneficial effects against each other the overall effect on the significance of Moulsoe Buildings Farmhouse would fall within the "less than substantial" range of harm at a moderate level, using NPPF terminology. Using EIA terminology these effects would be regarded separately as major adverse and moderate beneficial (outlined paragraph J5.8 and Table J5.2, Chapter J: Historic Built Environment), although the degree of harm could be further mitigated through good design and layout as part of future reserved matters applications.

## **Heritage Assets in Moulsoe**

- 4.20 Thirteen listed buildings have been identified in Moulsoe, including the highly graded Church of St Mary (Grade I, all other listed buildings are Grade II) and two non-designated heritage assets. The position of Moulsoe, on a high point in the landscape, is such that there are wide ranging views to the south and west which include partial views of the Site. Longer distance views in these directions include the outer urban fringes of Milton Keynes on the horizon, comprising large warehouses at Magna Park to the south. As such, whilst appreciated most immediately as a rural settlement, Moulsoe is experienced more widely in relation to the adjacent urban settlement.
- 4.21 Development within the Site would affect the settings of some of the heritage assets in Moulsoe to varying degrees, introducing urban development within the mid-distance of existing views towards the urban edge of Milton Keynes. The parameter plans illustrate how effects of development would be screened and mitigated as far as reasonably practicable through the inclusion of appropriate and naturalistic landscaping, as well as by the control of building heights in those areas with greatest visual sensitivity with regards to built heritage (discussed in detail below).
- 4.22 A key design consideration of the proposed development has been potential changes to the setting of the Church of St Mary and effects on its significance. Consideration has also been given to The



Rectory, located to the north of the church on the edge of the settlement, within its own private grounds with boundary planting. The Land Use Parameter Plan shows land to the south of the church allocated as a primary school, along with residential areas and play space beyond. The Building Heights Parameter Plan shows that development within the school grounds would be stepped back from the Site boundaries to the north and west and would be up to one storey/max. 8m ridge height (from existing ground levels +/- 2m) in height, in recognition of the sensitive location in built heritage terms. It is acknowledged that unmitigated views of maintained playing fields may affect the rural setting of the church and the landscaping strategy, detailed in the Design and Access Statement, proposes more naturalistic planting to the boundary to screen these views into the Site. Potential views of development from the Church of St Mary's environs would be additionally minimised by the descending topography to the south, which would restrict views into those parts of the Site lying closest to it (particularly in light of the lower building heights and set back position of development). Church Farm, lying to the south of the church, would additionally assist to screen views of the wider Site.

- 4.23 Further to the south and south west of the primary school site/residential area land within the Site is intended for employment use, which would include warehouse type developments in the foreground of existing views towards Magna Park. Detailed proposals for this part of the Site would be brought forward as part of a reserved matters application, which could include appropriate design mitigation measures. During pre-application discussions (meeting on 2 February 2021) Milton Keynes Council stated that the proposed warehouses and associated landscaping (to be confirmed as part of the future reserved matters application) could have beneficial effects in this location by screening longer distance, unmitigated views towards existing warehouses at Magna Park. In this way the proposed development could additionally deliver enhancement works to the setting of St Mary's Church.
- 4.24 To the west and north west of Moulsoe land within the Site is shown for residential use and a school, with a primary transport route running along the Site's eastern edge. Listed buildings to the north of Newport Road within Moulsoe (First Thatch Cottage, Hillcrest Cottage, Wistaria Cottage, and St Mary's Cottage (all Grade II) would experience views of development to varying degrees; the Church of St Mary may additionally experience distant and restricted views of development to the west, from its higher position in the landscape. The effects of development would be minimised by the positioning of lower height residential buildings along this eastern edge of the Site (up to 2.5 storeys/max. 12.5m ridge height (from existing ground levels +/- 2m), Building Heights Parameter Plan), taking into consideration the undulating contours of the landscape.
- 4.25 A key element of the proposed development, shown on the Green Infrastructure Parameter Plan and discussed in the accompanying Design and Access Statement, is the inclusion of a substantial woodland buffer to the eastern edge of the Site, which would create over six hectares of community woodland. The placement and design of this woodland has been informed by an understanding of the historic local landscape and would partly restore an area of woodland in this location, known as Drake's Gorse. The tree planting would provide appropriate and naturalistic screening to the Site's eastern edge in outward views from Moulsoe, minimising effects of new built form on the settings of the identified heritage assets.
- 4.26 The proposed development would impact to varying degrees on the settings of heritage assets identified in Moulsoe, relating principally to the creation of mid and longer distance views of built form along the eastern edges of the Site, in place of existing agricultural land, as well as to the south of Moulsoe in the foreground of existing views towards the urban edge of Milton Keynes. Whilst mitigation measures have been included within the parameter plans there would remain some level of harm to significance, relating to:
- Church of St Mary, Grade I
  - First Thatch Cottage, Grade II
  - Hillcrest Cottage, Grade II
  - Wistaria Cottage, Grade II

- St Mary's Cottage, Grade II
- The Rectory, Grade II

4.27 Using terms of the NPPF the level of harm is considered to fall within the range of "less than substantial" harm, with The Rectory experiencing a very low level of harm and the other listed buildings low to moderate levels of harm. In weighing associated beneficial effects against any harmful effects of development on the setting and significance of the Church of St Mary it is considered that the overall effect would fall within the "less than substantial" range of the NPPF at a broadly minor level. Paragraph 196 of the NPPF states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal. It is considered that the identified levels of harm arising from the proposed development to the significance of the identified heritage assets would be outweighed by the substantial public benefits which would be delivered in developing this allocated site. Using EIA terminology the overall effects would be regarded as minor adverse (outlined paragraphs J5.9-5.10 and Table J5.2, Chapter J: Historic Built Environment), although the degree of harm could be further mitigated through good design and layout as part of future reserved matters applications.

### **Campbell Park Registered Park and Garden, Grade II**

4.28 There are long distance panoramic views from the high point of Campbell Registered Park and Garden looking to the north east, which include parts of the Site. There would therefore be some long distance views of proposed development from the park, although these views would only be appreciable in relation to this single view and the majority of the park and its significance would be unaffected. The affected view would see the expansion of the outer edges of Milton Keynes to the north east, reducing the degree of visible rural landscape. Whilst this would reduce the degree to which a viewer can appreciate the Registered Park within a wider context, it would not fundamentally alter the way in which the overall importance of the park and its design are currently appreciated. The proposed development would also only affect one element of what is a far wider panoramic view. In NPPF terms, there would be a low degree of harm to the overall significance of the registered park and garden, falling within the range of "less than substantial" harm. Paragraph 196 of the NPPF states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal. It is considered that the low level of harm to the registered park and garden arising from the proposed development would be outweighed by the substantial public benefits which would be delivered in developing this allocated site. Using EIA terminology the effect of the proposed development would be regarded as minor adverse (outlined paragraph J5.11 and Table J5.2, Chapter J: Historic Built Environment).

### **Cotton Valley Sewage Treatment Works, Pineham**

The Green Infrastructure Parameter Plan illustrates that areas of the Site located closest to the Cotton Valley Sewage Treatment Works, at Pineham would fall within the proposed linear park, without any proposed built form. As such, whilst there would be changes introduced to the setting of the non-designated heritage asset, the verdant surroundings of the sewage works which contribute to its significance would remain conserved.

## 5 CONCLUSIONS

- 5.1 This Built Heritage Baseline Assessment has been researched and prepared by RPS on behalf of the St James Group with regard to the Site known as Milton Keynes East.
- 5.2 The Site is located within the Borough of Milton Keynes. It principally comprises a large irregularly shaped area of farmland, to the north east of the M1 motorway. The boundary includes sections of London Road (A509) and Newport Road to the north of the M1, and extends south of the M1 to include a section of Tongwell Street (V11). An additional area of land is included to the immediate south of the M1, to the north and east of the Cotton Valley sewage treatment works (Figure 1).
- 5.3 The Milton Keynes Local Plan, Plan:MK (adopted March 2019) allocates those areas of the Site to the north of the M1 for a mixed residential and employment development, as part of the Milton Keynes East Strategic Urban Extension.
- 5.4 Proposals for the Site comprise:
- 5.5 *Hybrid planning application encompassing: (i) outline permission (with all matters reserved) for a large-scale mixed-use urban extension (creating a new community) comprising: residential development; employment including business, general industry and storage/distribution uses; a secondary school and primary schools; a community hub containing a range of commercial and community uses; a new linear park along the River Ouzel corridor; open space and linked amenities; new redways, access roads and associated highways improvements; associated infrastructure works; demolition of existing structures and (ii) detailed permission for strategic highway and multi-modal transport infrastructure, including: new road and redway extensions; a new bridge over the M1 motorway; a new bridge over the River Ouzel; works to the Tongwell Street corridor between Tongwell roundabout and Pineham roundabout including new bridge over the River Ouzel; alignment alterations to A509 and Newport Road; and associated utilities, earthworks and drainage works.*
- 5.6 The Site entirely surrounds (but does not include) one Grade II listed building which is included on the statutory list as Moulsoe Buildings Farmhouse (currently a Holiday Inn). There are a further twenty one listed buildings (three listed at Grade I and eighteen at Grade II), two conservation areas and three non-designated heritage assets recorded on the local Historic Environment Record (HER) within a 500m radius of the Site (Figure 2). Whilst lying outside of this study area, the Grade II Registered Park and Garden at Campbell Park, Milton Keynes, is also appraised within this report as part of a comprehensive assessment, recognising its position in the landscape with longer distance views north eastwards towards the Site.
- 5.7 This baseline assessment has identified that there would be “less than substantial” harm in varying degrees (minor to major) arising to the setting and significance of the following heritage assets:
- Moulsoe Buildings Farmhouse, Grade II
  - Church of St Mary, Grade I
  - First Thatch Cottage, Grade II
  - Hillcrest Cottage, Grade II
  - Wistaria Cottage, Grade II
  - St Mary’s Cottage, Grade II
  - The Rectory, Grade II
  - Campbell Registered Park and Garden
- 5.8 The identified harm arises from the replacement of agricultural land within the Site with built form and infrastructure, which would appear in close proximity to Moulsoe Buildings Farmhouse and

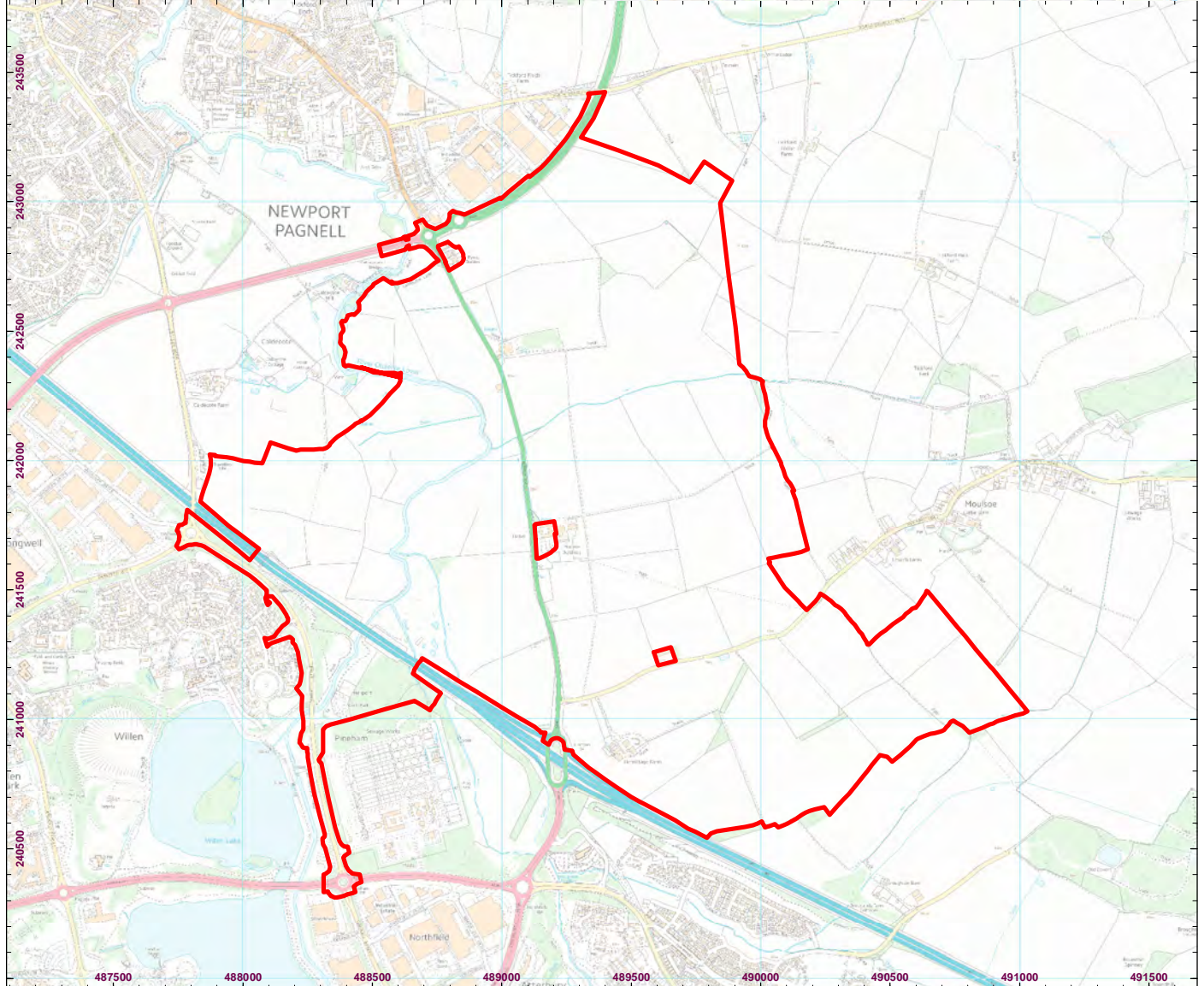
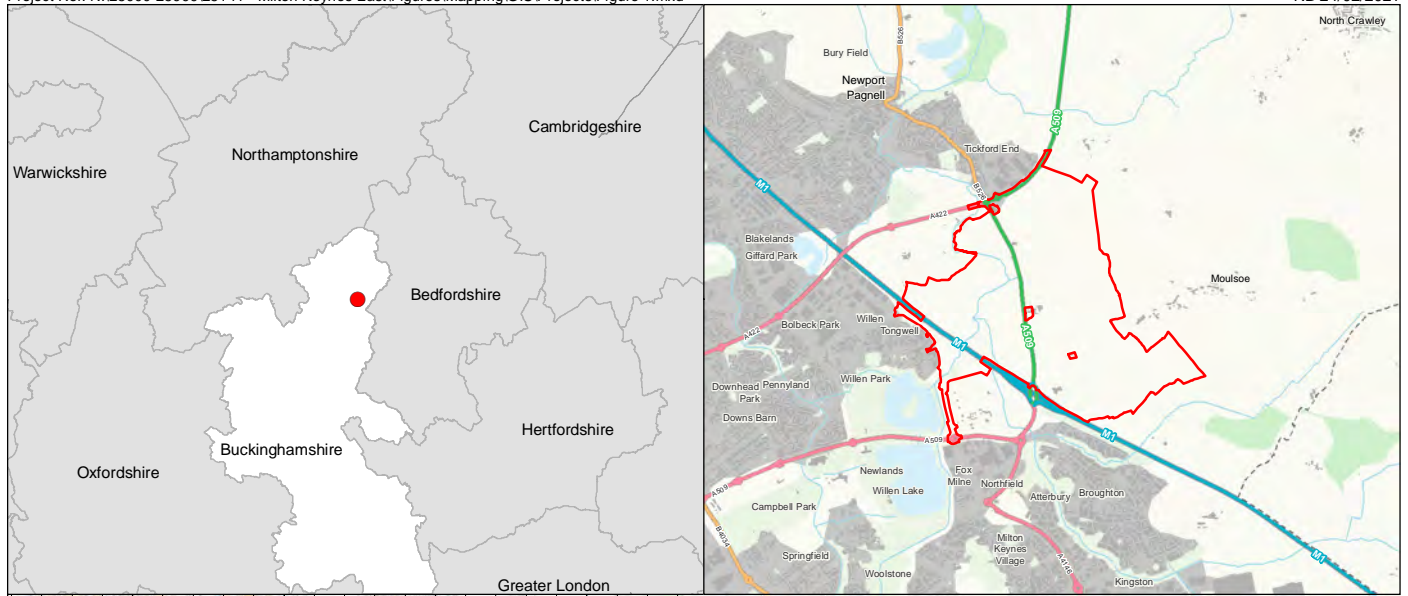
more distantly in relation to listed buildings in Moulsoe and, further still, Campbell Park Registered Park and Garden.

- 5.9 The proposed development would additionally deliver a range of heritage benefits. Particular benefits may be derived in relation to Moulsoe Buildings Farmhouse, by the downgrading of London Road and by new pedestrian routes which create new opportunities to appreciate the special interest of the currently under-recognised listed building. Heritage benefits may also be deliverable by using well designed new development and associated landscaping to screen existing poor quality views from the Church of St Mary towards warehouses at Magna Park.
- 5.10 The degree of harmful or beneficial effects of development may be further mitigated through appropriate design measures as part of future reserved matters applications.
- 5.11 There would nevertheless remain a degree of resultant harm as a result of the proposed development. Paragraph 196 of the NPPF states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal. It is considered that the level of harm to the identified heritage assets arising from the proposed development would be outweighed by the substantial public benefits which would be delivered in developing this allocated site.



**APPENDICES**

## Appendix A Maps



 Site Boundary

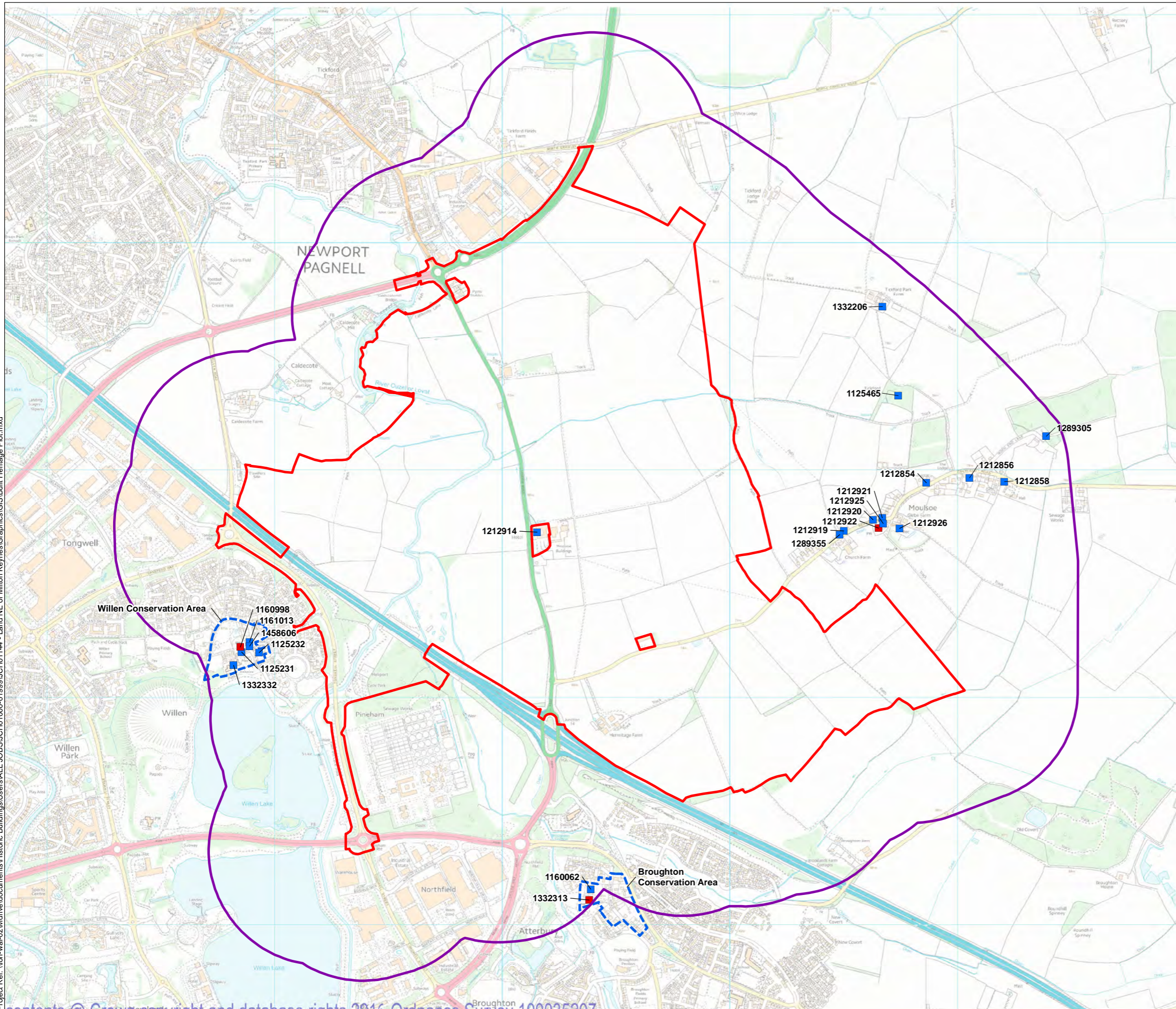


0 250 500m  
Scale at A4: 1:25,000



Figure 1  
Site Location

Project Ref: \\non-wa-02\drive\documents\Historic\_Buildings\Users\ALL\_JOBS\CH01000-01999\CH01144 - Land NE of Milton Keynes\Graphics\GIS\Built\_Heritage\_Plot.mxd



**Legend**

- Site Boundary
- 500m search radius

Designated Heritage Assets:

**Listed Buildings**

**Grade**

- I
- II
- Conservation Areas

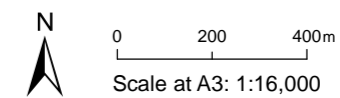
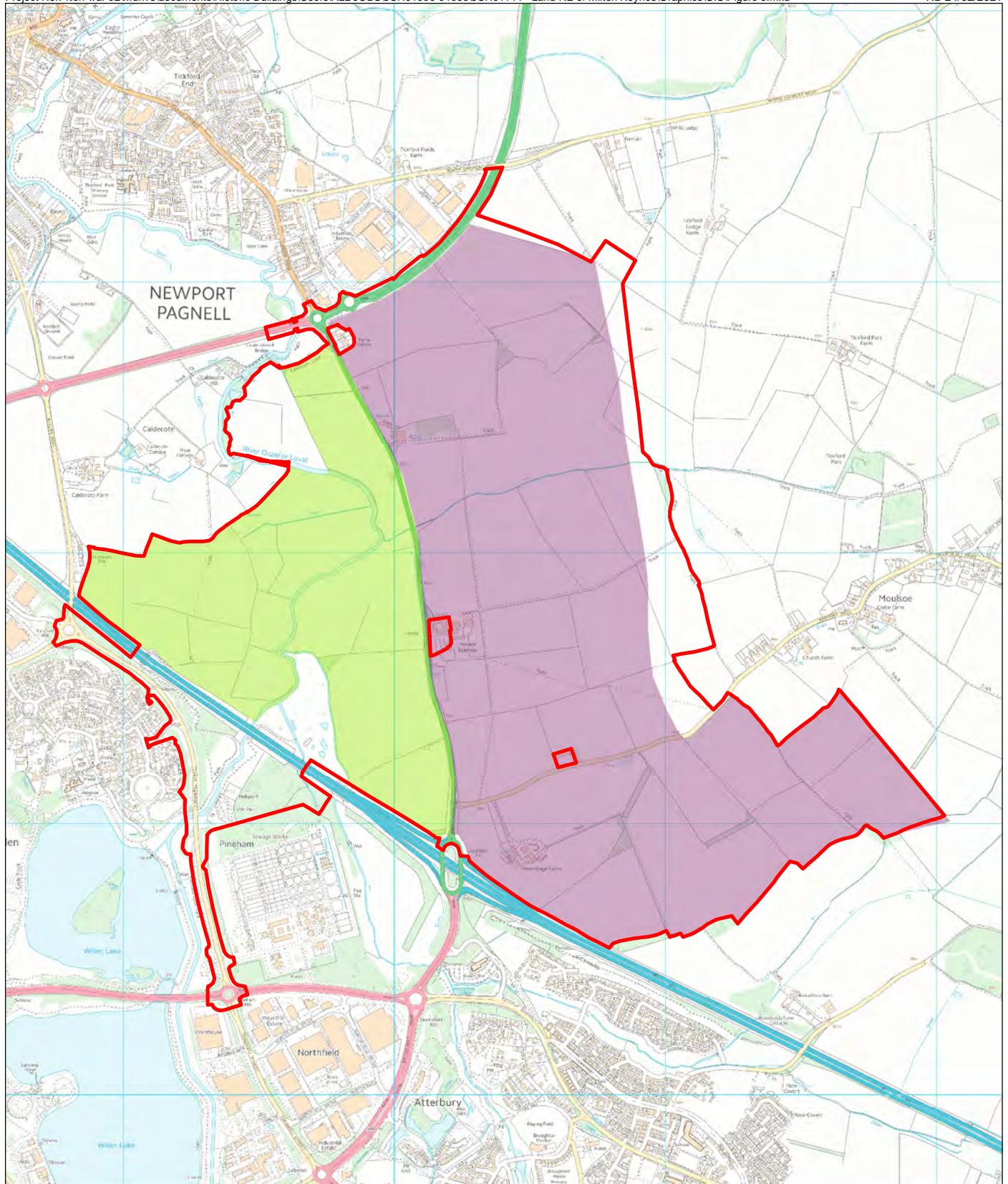





Figure 2

Built Heritage Assets Plot





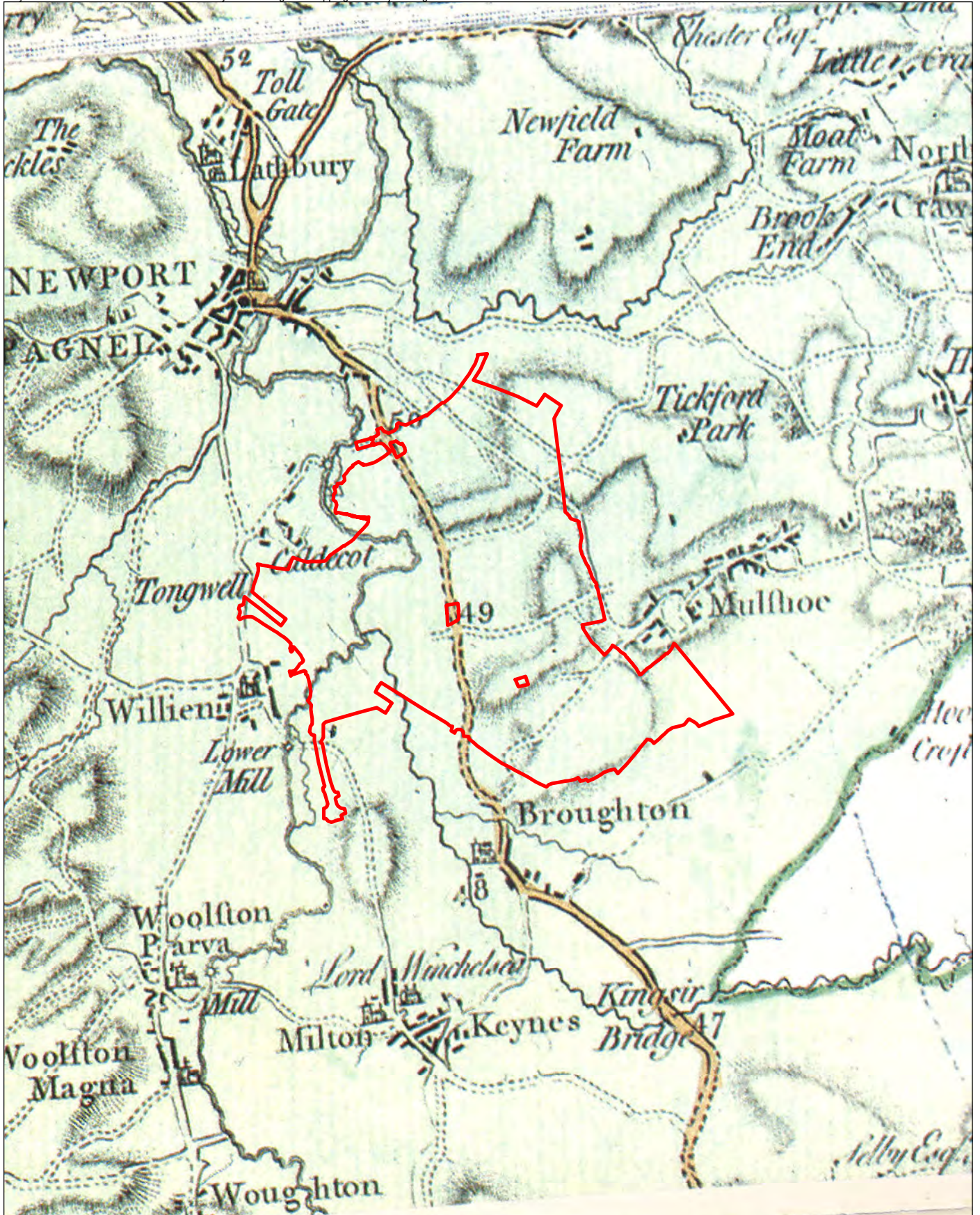
-  Site Boundary
-  Area of well preserved Parliamentary Enclosure
-  Fragmentary Historic Landscape



0 200 400 600m  
Scale at A4: 1:20,000



Figure 3  
Areas of Historic Landscape Potential



 Site Boundary

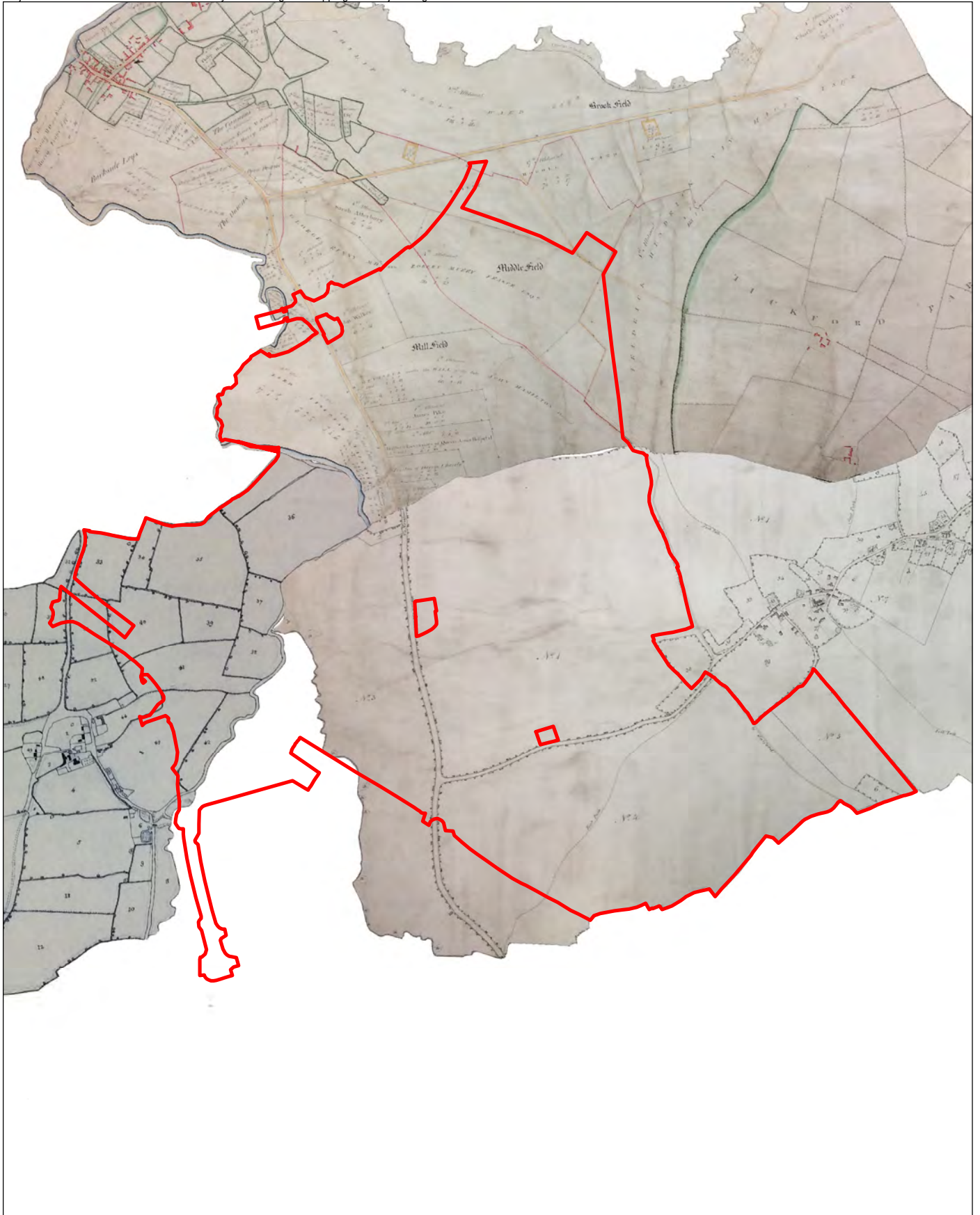


0 250 500 750 1,000m  
Scale at A4: 1:35,000



Figure 4

1768 Jeffrey's Map of Buckinghamshire



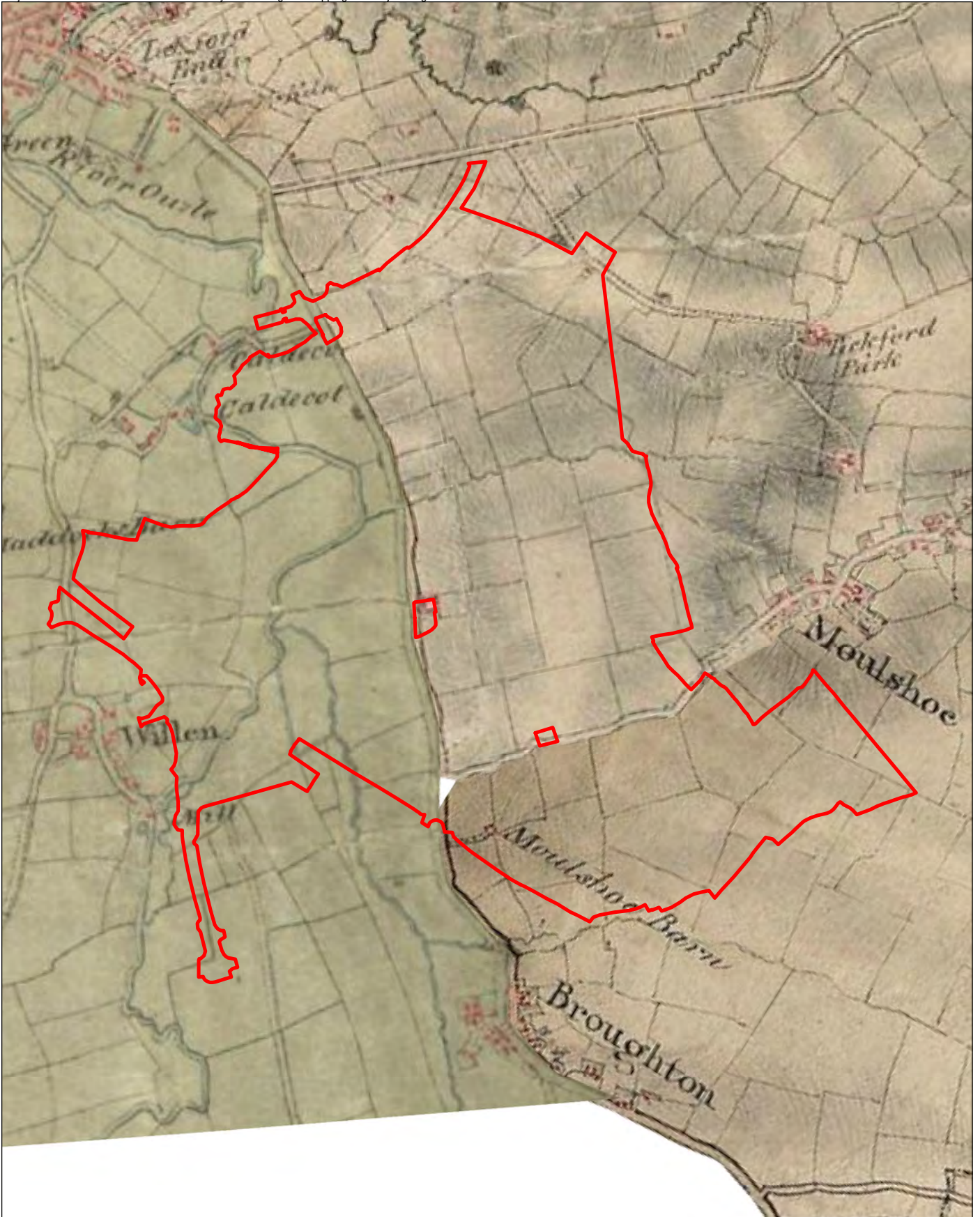
 Site Boundary



0 250 500m  
Scale at A4: 1:20,000



Figure 5  
1802 Moulsoe Enclosure Map, 1808  
Tickford Enclosure Map (Part of  
Newport Pagnell Parish) & 1822 Map  
of the Manor and Parish of Willen



 Site Boundary



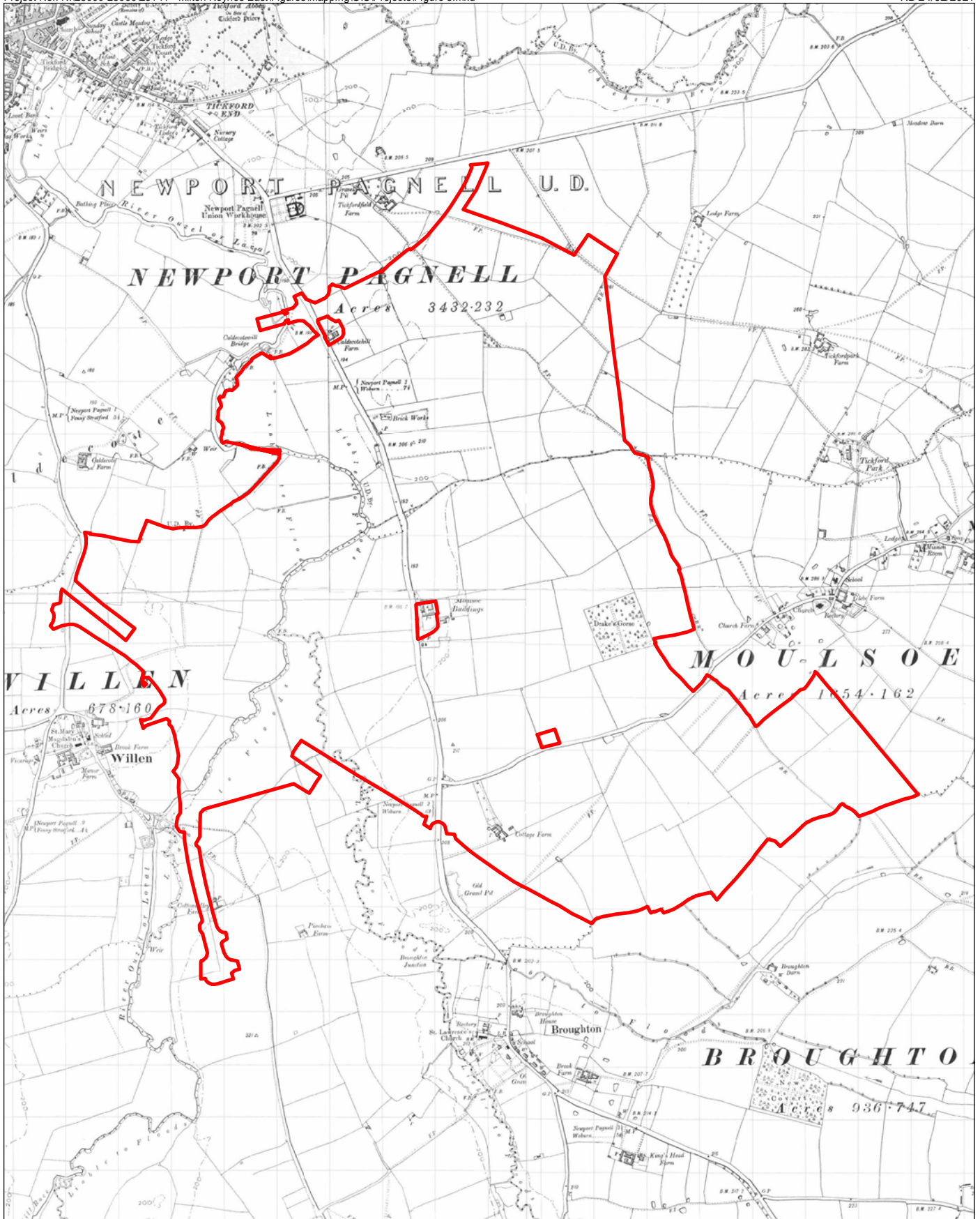
0 250 500m  
Scale at A4: 1:20,000



Figure 6

1814-15 Ordnance Survey Drawing





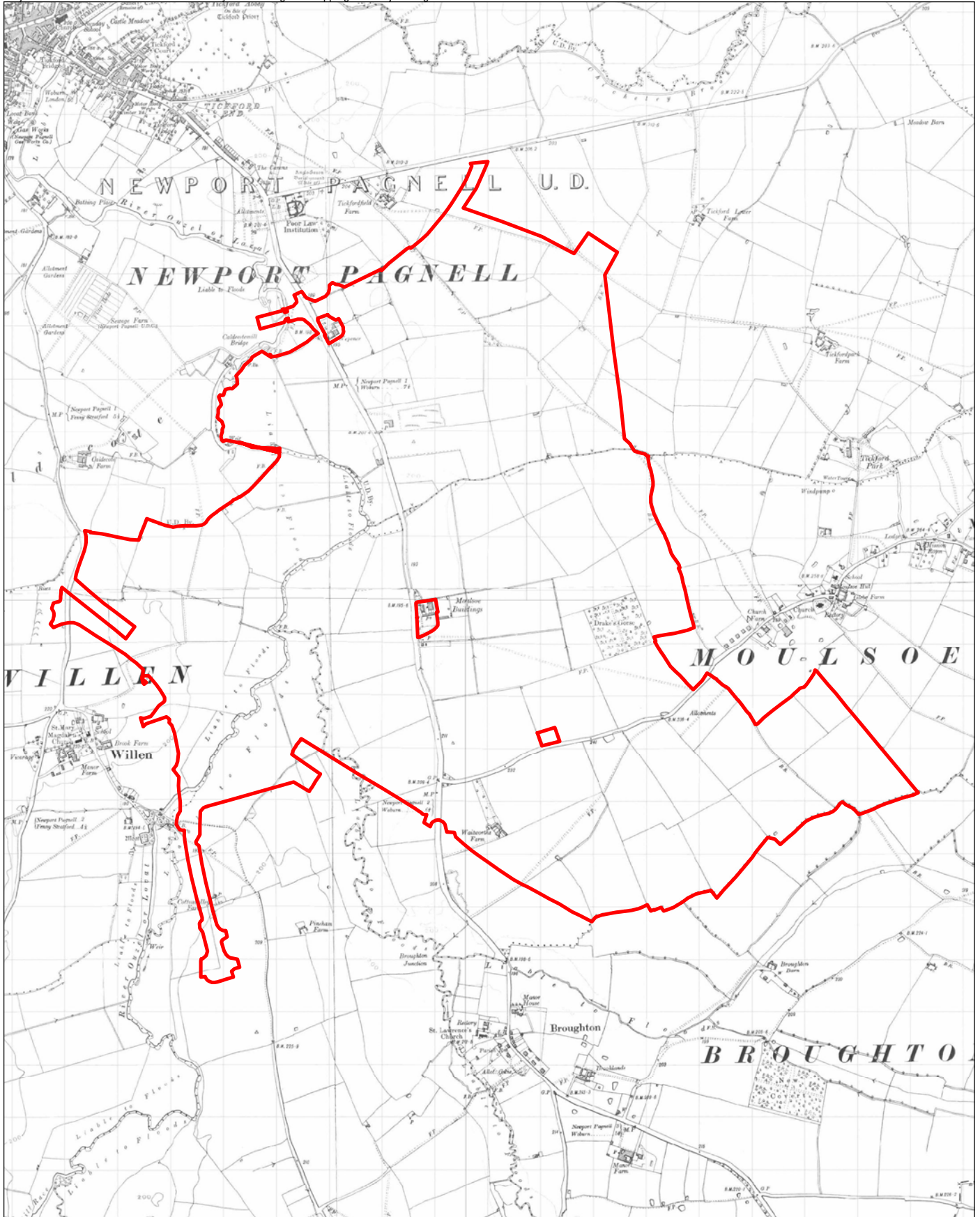
 Site Boundary



0 250 500m  
Scale at A4: 1:20,000



Figure 8  
1899 Ordnance Survey Map  
(1:10,560)



 Site Boundary



0 250 500m  
Scale at A4: 1:20,000



Figure 9

1924 Ordnance Survey Map  
(1:10,560)



 Site Boundary



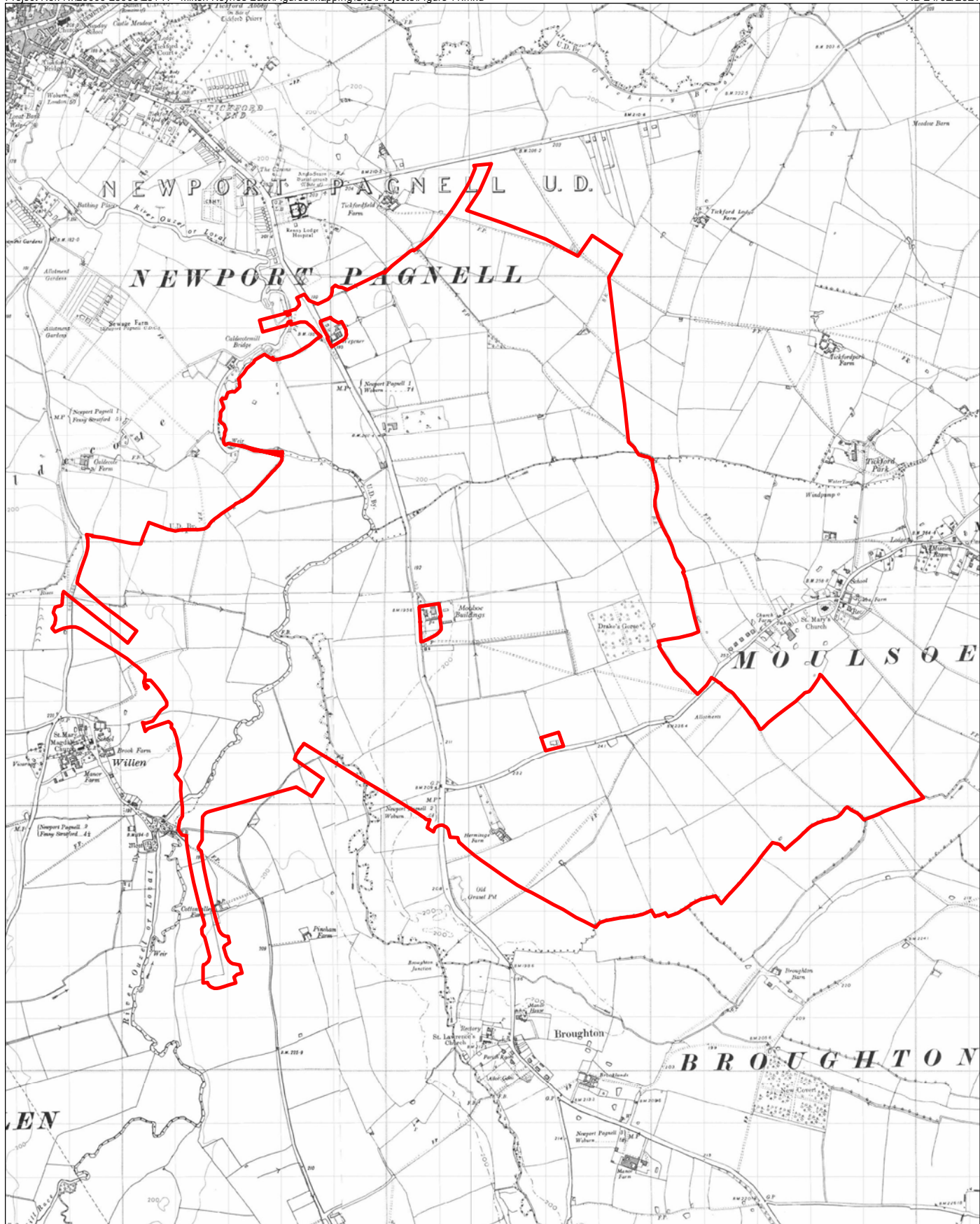
0 250 500m  
Scale at A4: 1:20,000



Figure 10

1945 Aerial Photograph  
(Google Earth Image)





 Site Boundary

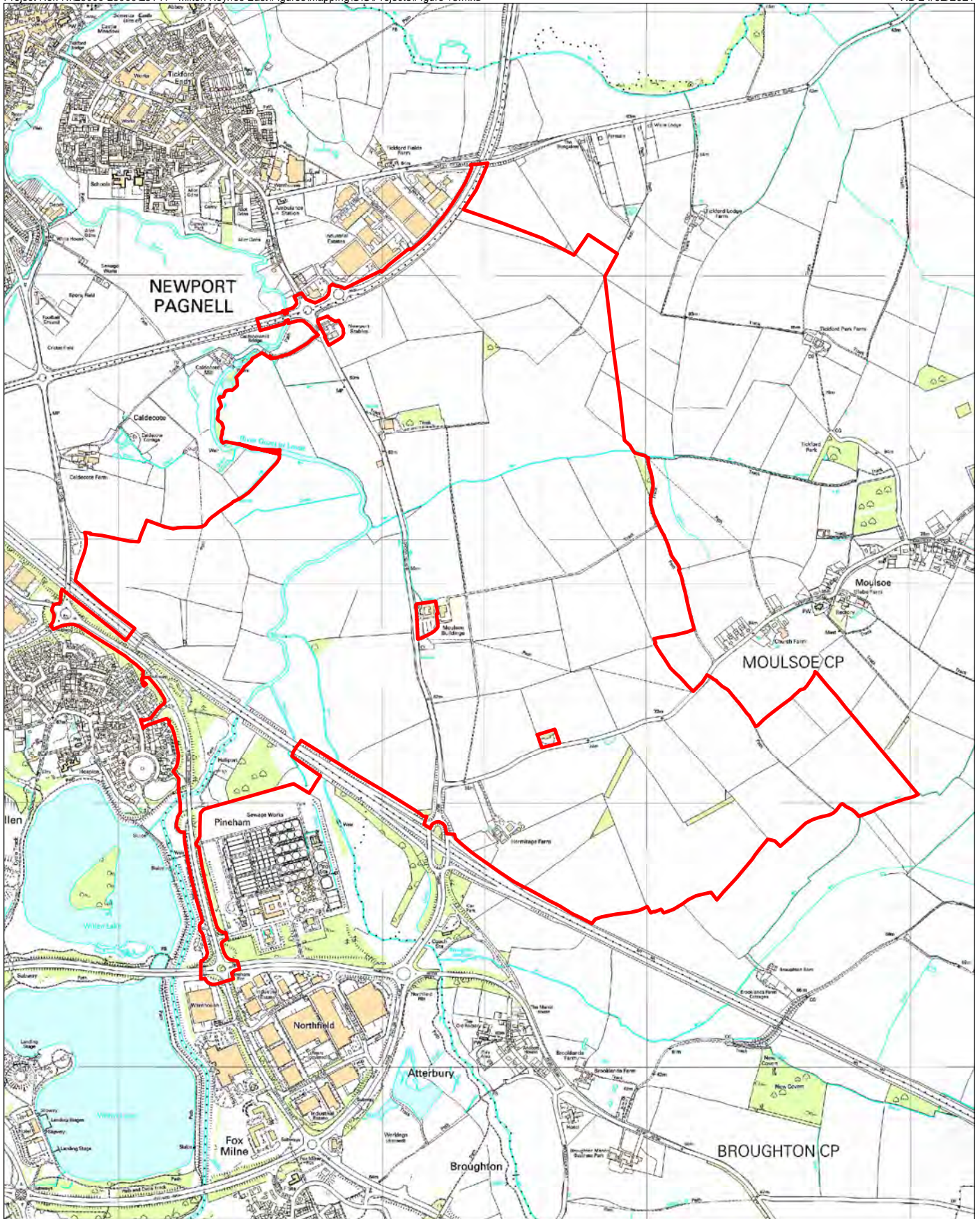


0 250 500m  
Scale at A4: 1:20,000



Figure 11  
1950-51 Ordnance Survey Map  
(1:10,560)





 Site Boundary



0 250 500m  
Scale at A4: 1:20,000



Figure 13  
2002 Ordnance Survey Map  
(1:10,000)



 Site Boundary



0 250 500m  
Scale at A4: 1:20,000



Figure 14  
2003 Google Earth Image



 Site Boundary



0 250 500m  
Scale at A4: 1:20,000



Figure 15

Site as Existing  
(2018 Google Earth Image)

## Appendix B Photographs



**Figure 17:** Moulsoe Buildings Farmhouse (Grade II)



**Figure 18:** Church of St Mary, Moulsoe (Grade I)



Figure 19: View from public bridleway (within the Site) looking northwards to the Church of St Mary on the skyline.



Figure 20: View from the churchyard of St Mary, Moulsoe (Grade I) looking south towards the Site and the urban edges of Milton Keynes (including warehouses at Magna Park).





Figure 21: The elevated position of Moulsoe in the landscape is such that it benefits from wide ranging views westwards towards the Site. Listed buildings along the western edge of Newport Road would experience distant visual effects of development within the Site, which would be mitigated through an appropriate landscaping strategy.

**Appendix C** Historic England Pre-Application Advice Letter



Historic England

LONDON OFFICE

Ms Victoria Brocksopp  
RPS Group  
20 Farringdon Street  
London  
EC4A 4AB

Direct Dial: 020 7973 3635

Our ref: PA01148965

3<sup>rd</sup> March 2021

Dear Ms Brocksopp

## **Pre-application Advice**

### **Milton Keynes East**

Thank you for your letter of 15<sup>th</sup> February 2021 seeking engagement with Historic England in pre-application discussion on the emerging project involving a large-scale mixed-use urban extension in an area located to the north east of the town centre of Milton Keynes.

Due to current restrictions we have not been able to visit the site. However, the Pre-Application Built Heritage Baseline Assessment produced by RPS in February 2021 has provided us with valuable information for identifying and assessing the significance of designated and undesignated heritage assets on site which could be impacted by the proposals.

A large part of the site falls within land allocated by strategic policy SD12 of the Local Plan: MK 2016-2031, adopted in March 2019, for a comprehensive new residential and employment development to meet the long-term needs of Milton Keynes.

Consisting mainly of open agricultural and pastoral land, the site is crossed by London Road (A509), the principal historical thoroughfare connecting the village of Broughton in the south with the important coaching centre of Newport Pagnell to the north. The built environment comprises the grade II listed Moulsoe Buildings Farmhouse to the east of London Road which, although not included within the site boundary, is surrounded by it. Another undesignated farmstead, currently known as Hermitage Farm, is located in the southern section of the site.

Accordingly, the development site does not comprise designated heritage assets. However, there are several heritage sensitive areas located on the edge or in close



Historic England, 4<sup>th</sup> Floor, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA

Telephone 020 7973 3700 Facsimile 020 7973 3001

[HistoricEngland.org.uk](http://HistoricEngland.org.uk)

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proximity to the site boundary whose character and integrity could be affected by the emerging scheme.

In this respect, our principal concerns regard potential adverse impact accruing from the current proposals on the significance of identified heritage assets by alterations to their settings.

### Impact of Development on Designated Heritage Assets at Moulsoe

One of the principal heritage assets surrounding the site boundary whose significance can be affected by the intended development is the grade I listed Church of St Mary falling within Moulsoe conservation area.

Strategically built in the 14<sup>th</sup> century on an elevated position to act as a focal point in the landscape, the church's immediate setting is characterised by its churchyard with associated standing monuments and, beyond, by a number of grade II listed building along Newport Road. Relevant here on visibility grounds are the nearby timber framed cottages known as First Thatch, Hillcrest, Wistaria and St Mary's, which form a consistent historical contextual group with the church.

Due to Moulsoe's overall raised topography, panoramic views towards the south and west encompass the development site, and far beyond, against the horizon, the silhouette of Milton Keynes's urban fringes including the large warehouses at Magna Park. Conversely, St Mary's Church can be appreciated in long-range views from the site as a landmark building within the surrounding open landscape. In its current rural configuration, the site forms the appropriate setting of the church and surrounding buildings, positively contributing to their significance, as well as to the character of the conservation area where they are located.

The proposals allocate land immediately to the south of the church as a single-storey primary school, surrounded by residential areas of increased scale located beyond and to the west. At this outline stage there is no information relating to the design, however, it is undisputable that the proposals would result in a significant intrusion of modern urban development within the mid-distance of existing views. In addition, the introduction of playing fields associated to the mentioned development would exacerbate the proposed alteration to the landscape character of the rural settlement.

Overall, the current scheme would harm the appreciation of the church and a number of heritage assets associated to it which contribute to the character and appearance of the conservation area. A range of key wireline/massing views together with a thorough LVIA should be produced to test the environmental effects of the proposals and inform revisions to the current scheme and landscape plan. This exercise would also help assess the effect of the proposed woodland buffer.

With regard to intended development for employment use on land located further to the south and south west of the school/residential area, we support advice provided by the LPA at pre-application stage. Depending on the quality of detailed design in terms of scale, massing and materiality, the intended development could be seen as an



Historic England, 4<sup>th</sup> Floor, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA

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opportunity for mitigating current disruptive long-distance views of the existing substantial warehouses at Magna Park.

#### Impact of Development on Other Sensitive Heritage Assets

The Pre-Application Built Heritage Baseline Assessment has scoped out from detailed appraisal Broughton conservation area located to the south-east of the site, outside the development area boundary. This approach has been based on considerations about its virtual distance from the site due to the intervening A5130, and more widely to the M1, and the nature of the prevailing landscape, which would prevent inter-visibility with the proposed development.

Broughton is a small and still tranquil rural estate village which has a historical connection with the development area due to surviving London Road which, forming its main axis, extended across the site to connect to the coaching centre of Newport Pagnell.

At the time of the construction of the M1 and subsequent expansion of Milton Keynes as a New Town in the second half of the twentieth century, this immediate interconnection with the site was harshly severed. However, the consistent character and appearance of the village, dominated by its church tower, has been retained and is still appreciable from a number of key views. These have been identified along the Broughton Brook Linear Park and from two specific vantage points located on the new bridge crossing Broughton Brook and around the junction of Ambergate with Tanfield Lane. These views highly contribute to the character or appearance of Broughton conservation area.

Emerging proposals would seek permission for strategic highway and multi-modal transport infrastructure including a new bridge over the M1 motorway; works to the Tongwell Street corridor between Tongwell roundabout and Pineham roundabout including a new bridge over the River Ouzel; alignment alterations to London Road (A509) and Newport Road; and associated utilities, lighting, earthworks and drainage works.

Further details about the proposed works should be provided to ensure that they would not have adverse impact on the mentioned key views and on the preserved historical character of the village, which is currently enhanced by the absence of visual clutter and ubiquitous items such as signs, bins, bollards and street lights.

Similar potential implications on Willen conservation area should be also tested.

The analysis of heritage sensitive areas surrounding the site included in the Built Heritage Baseline Assessment has not considered potential impact of the proposed development on Newton Pagnell conservation area located beyond the north-western edge of the site boundary. The surrounding pastoral rural backdrop is indicated as an essential element of the town's setting in the Conservation Area Review. In addition, important vistas towards the countryside and open spaces in and out of the town have been identified around its northern, eastern and southern perimeters.



Historic England, 4<sup>th</sup> Floor, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA  
Telephone 020 7973 3700 Facsimile 020 7973 3001  
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Accordingly, the potential implications of the proposed masterplan on the character and appearance of Newton Pagnell conservation area should also be tested.

Impact of the emerging proposals on the setting of the grade-II listed Moulsoe Buildings Farmhouse is beyond our remit. However, we welcome the planned downgrading of London Road. This would reduce the quantity and quality of vehicular traffic, resulting in an enhancement of our ability to experience the listed building within a less disrupting context, more akin to the original.

Notwithstanding this, the proposed dense four-storey residential development in close proximity to the heritage asset would transform its rural setting causing a degree of harm to its significance. A meaningful buffer zone, as well as careful attention to scale and massing of the proposed surrounding development should be considered to reduce the perceived heritage harm. While it would be advantageous to create a screening effect with trees and vegetation, thereby protecting the setting of the building from the intrusion of extensive new development, it would also be a benefit to enhance the farmstead as a feature in the landscape. This should be given consideration in due course when developing the landscape plan.

We appreciate the fact that the baseline assessment has taken into consideration the necessity to address any potential effect of the emerging development on the setting of the grade-II registered Cambell Park, Milton Keynes in long-range views of the site and the landscape beyond the M1. These views contribute to the significance of the registered park, as they reflect the design principles informing the planning of New Towns, built as a remedy to decongest overcrowding and industrialised cities by providing self-sufficient ad hoc settlements in relationship with the wider countryside.

Finally, the proposals may affect heritage assets of archaeological interest falling within the development site. It would be useful to access the Archaeological Desk Based Assessment mentioned at point 1.7 of the Built Heritage Baseline Assessment to advise on the potential heritage implications of the emerging scheme on the significance of any identified assets.

### Policy Considerations

Under the NPPF it is a core planning principle to conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations (paragraph 184). When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (paragraph 193).

The NPPF recognises that the significance of a heritage asset can be harmed or lost through development within its setting. Therefore proposals that preserve those elements of the setting that make a positive contribution to the asset, or which better reveal its significance, should be treated favourably (paragraph 200).

As heritage assets are irreplaceable, any harm or loss of a designated heritage asset's significance from development within its setting should require clear and convincing justification (paragraph 194).



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It is therefore a planning requirement to test the necessity of any harmful works and to ensure that identified heritage assets are protected.

### **Next Steps**

We have identified potential adverse impacts accruing from the emerging proposals on the significance of a number of designated heritage assets falling outside the site boundary, through unsympathetic alterations to their setting.

We recommend production of a range of key wireline/massing views and a thorough LVIA to allow for a full assessment of the implications of the current scheme on the significance of the identified, as well as other potentially relevant, heritage assets. Once this analytical exercise is completed, you should consider what alterations and mitigations are needed to minimise harm to the historic environment.

Accordingly, your emerging scheme may benefit from our continued engagement. If so, we would welcome the opportunity to offer you our extended pre-application service to provide a bespoke programme of advice and engagement beyond this initial response.

If you would like to discuss this option further, please do contact me.

Yours sincerely

Luciana Gallo

### **Luciana Gallo**

Assistant Inspector of Historic Buildings and Areas  
London and South East Regions Group

**E-mail: [Luciana.Gallo@HistoricEngland.org.uk](mailto:Luciana.Gallo@HistoricEngland.org.uk)**



Historic England, 4<sup>th</sup> Floor, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA

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