



Mr David Buckley  
Milton Keynes Council

Direct Dial: [REDACTED]

Our ref: P01092270  
3 September 2019

Dear Mr Buckley

**T&CP (Development Management Procedure) (England) Order 2015  
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**LAND AT BRICKHILL STREET, SOUTH CALDECOTTE, MILTON KEYNES, MK17  
9FE**

**Application No. 19/01818/OUT**

Thank you for your letter of 24 July 2019 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

**Summary**

Historic England objects to this development on heritage grounds. The assessment of significance of the heritage assets submitted by the applicant is inadequate and I advise that the applicant be required to revise it, taking into account my comments below. The application does not meet the requirements of the NPPF.

**Historic England Advice**

I understand that this is an application for commercial development. The site lies immediately north of the scheduled monument known as *Roman Town of Magiovinium and Roman Fort*, List no. 1006943.

Desk-based assessment, geophysical survey and trial trench evaluation have shown that archaeological remains are present on the site. These remains date from the Iron Age to the post-Medieval period. A D-shaped Iron Age enclosure was found in the northern part of the site. Further south was a Roman street leading northwards from the Roman town, with associated enclosures beside the street and associated settlement leading north from the town of Magiovinium. Iron Age pottery found in this area suggests that there may be further Iron Age features here. In the southern area, closest to the scheduled monument, the remains underlie ridge and

Significance of a heritage asset is normally considered as being the sum of its heritage values - evidential, historic (illustrative and associative), aesthetic and communal (See *Conservation Principles*, Historic England, 2008). The significance in this case is principally the evidential value (other values are discussed below) and concerns the



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700  
HistoricEngland.org.uk





potential of the archaeological remains to yield information.

The Milton Keynes Conservation and Archaeology Team Service have provided detailed advice on the evidential value, I agree with and support their advice. In particular, please note the following.

The remains may be of national significance. Certainly the applicant has not made a clear case for the remains being of less than national significance. An assessment of significance is required which:

1. makes full use of the Historic England listing criteria including the Historic England Scheduling Selection Guide: 'Settlement Sites to 1500' (HE 2018);
2. is supported by the evidence;
3. uses an appropriate scale of significance (as set out in Table 3 of the Desk-based Assessment, but which is not then applied).

It is inadequate, for example, to assert that certain elements of the archaeological remains (floors and other surfaces) will not survive, without explaining why this should be the case, particularly when Roman road surfaces do survive. Also, preservation was good enough for several phases of the Roman roadside ditches to be identified and dated. I also concur that the applicant has given insufficient weight to the fact that ridge and furrow earthworks survives over the earlier archaeological remains, meaning modern ploughing will not have damaged them. The applicant could consult Historic England for a formal listing opinion as to whether the archaeological remains are of schedulable quality and therefore of national importance, in which case paragraphs 193 to 196 of the NPPF will need to be considered.

I also agree with the Milton Keynes archaeology service that the application contains no assessment of the impact of the development on the significance of the archaeological remains, other than the implication, from the inclusion of a WSI for full excavation, that they will be removed or largely removed by the development. There is also no consideration of the potential for preservation of the remains in situ, through the design of the development. Paragraph 192 of the NPPF is relevant here, and the approach taken is clearly contrary to local planning policy.

With regard to other heritage values (historic (illustrative and associative), aesthetic and communal) that contribute to significance, the assessment provided by the applicant misunderstands and misapplies some of these. The associative value of the site is that it is associated with a well-known period, Roman, and with a known and named Roman town, Magiovinium, which appears in historic sources. The illustrative value is currently confined to the ridge and furrow which illustrates agricultural practice. The other information given in the DBA to support illustrative value is





normally considered as evidential. I would agree that the aesthetic value is limited but the fact that the land is private is not relevant.

Because the development site is adjacent to the scheduled Roman town, it is also necessary to assess to what extent the site contributes to the significance of the scheduled monument, and what impact the development would have on this. The applicant's submission says that the site is within the setting of the scheduled monument, and that: *...the site can be experienced as part of the SAM due to the results of the recent geophysical survey and trial trenching as well as an awareness of Neal's excavations in the late 1980s.* This appears to extend the concept of setting (meaning the experiencing of the heritage asset) to experiencing it on paper or onscreen, and does not follow accepted practice. Historic England, *The Setting of Heritage Assets*, Historic Environment Good Practice Advice in Planning: 3, pp. 4-5). The brief assessment of setting included in the desk-based assessment does not use the LDVIA submitted with the application.

My preliminary opinion is that the introduction of substantial built structures which will be visible above the hedge line from the scheduled monument (LDVIA Viewpoint 7) will constitute some harm, but certainly less than substantial harm, to the significance of the monument. The more the surroundings of the monument appear as urban, the less easy it is to appreciate the original rural hinterland of the Roman town. However I advise that the applicant be asked to provide a revised assessment of setting, which takes into account my comments above, and which makes use of the LDVIA. I also advise that the LDVIA should be revised to include wireframe montages covering views from the monument. The LDVIA recognises that scheduled monuments are highly-sensitive receptors (LDVIA Table 1), but does not then apply this for the Roman town.

### **Recommendation**

Historic England objects to the application on heritage grounds.

We consider that the application does not meet the requirements of the NPPF, in particular paragraph number 189.

Your authority should take these representations into account in determining the application. If you propose to determine the application in its current form, please inform us of the date of the committee and send us a copy of your report at the earliest opportunity.

Please contact me if we can be of further assistance.

Yours sincerely



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700  
HistoricEngland.org.uk





Historic England

**David Wilkinson**

Inspector of Ancient Monuments

E-mail [REDACTED]

cc: Mr Nick Crank, Senior Archaeological Officer, Milton Keynes Council



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

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