

Archaeological Assessment of Strategic Housing Land Availability Assessment (SHLAA) and Potential Employment Sites.

Archaeology Team, Central Bedfordshire Council, 31st October 2013.

The following assessment has been carried out to ensure that the archaeological potential of the prospective development sites that may be included in the Luton Local Plan 2011-2031 has been considered.

This work has been undertaken with reference to the requirements of paragraph 126, Chapter 12 of the *National Planning Policy Framework* (NPPF) published in March 2012, which states that Local Planning Authorities should set out in their Local Plan a positive strategy for the conservation and enjoyment of the historic environment. The NPPF states that Local Plans should recognise that heritage assets are irreplaceable resources which contribute to the character of a place and that their conservation can bring wider social, cultural and environmental benefits. When developing a Local Plan, Local Authorities should take into account the need to sustain and enhance the significance of heritage assets, where possible putting them to viable uses appropriate to their conservation and ensuring that new development makes a positive contribution to the character and distinctiveness of a place, so often influenced by its historic environment.

This document should be read in conjunction with the information presented in the Microsoft Excel spreadsheet that accompanies this overview (file name: Luton SHLAA Sites Sum Data 311013 Arch Comments Final).

Methodology

This assessment has been carried out in accordance with the *Statement of Requirements* (Collins, LBC 5th September 2013) prepared by Luton Borough Council. The scope of the assessment was to provide information to inform the review of the Luton Local Plan 2001-2011 and the development of relevant Local Plan policies in the new Local Plan 2011-2031, specifically with regard to the suitability of sites for development. The assessment comprised the following elements:

- A desk-based study to be carried out to determine the nature of the known and potential archaeological resource within the sites identified by maps and schedules supplied by Luton Borough Council.
- Identification of the nature, function, date and character of the known archaeological resource including any designations and with reference to the published local, regional and national research frameworks.
- Identification of those sites or areas that have archaeological potential, using the known archaeological context and with reference to the published local, regional and national research frameworks.
- Identification of whether archaeological investigation is necessary, in order to establish the presence (or absence) of any archaeological remains, and their location, extent, nature and date. This may include recommendations for investigation prior to the submission of any planning application.

All recommendations made in this assessment are based upon the available information about the potential development sites, supplied by Luton Borough Council. Advice on specific archaeological mitigation techniques has only been supplied where sufficient information is available about the nature of the proposed

development. All the archaeological recommendations are in line with the requirements of Chapter 12 of the NPPF.

It must be noted that this exercise was carried out remotely; because limited amounts of information have been uploaded on to the Luton Borough Council website, it was not always possible to check status of the existing planning consents. Therefore, where it is not certain whether a live consent exists, the archaeological advice assumes there is no planning permission.

The following documents have been referenced in this assessment and are widely available. Details about specific archaeological interventions referenced in this assessment but not produced in the list below can be obtained from the Central Bedfordshire and Luton Historic Environment Record (HER).

Primary References:

Bedfordshire County Council (2003) *Extensive Urban Survey for Bedfordshire: Luton Archaeological Assessment*. Available online at http://ads.ahds.ac.uk/catalogue/adsdata/arch-674-1/dissemination/pdf/Luton/fulltext/Luton_Assessment.pdf

Brown, N and Glazebrook, J (2000) *Research and Archaeology: A Framework for the Eastern Counties – 2 Research Agenda and Strategy*. East Anglian Archaeology Occasional Paper 8.

Communities & Local Government (2012) *National Planning Policy Framework*. Government National Planning Policy.

English Heritage (2011a) *Plaiters' Lea Conservation Area, Luton: Historic Area Assessment*. English Heritage Architectural Assessment, Report Series Number 69-2011.

Glazebrook, J (1997) *Research and Archaeology: A Framework for the Eastern Counties - 1 Resource Assessment*. East Anglian Archaeology Occasional Paper 3.

Medlycott, M (Eds) (2011) *Research and Archaeology Revisited: A Revised Framework for the East of England*. East Anglian Archaeology Occasional Paper 24. available online at: <http://www.eaareports.org.uk>

Oake, M, Luke, M, Dawson, M, Edgeworth, M and Murphy, P (2007) *Bedfordshire Archaeology - Research and Archaeology: Resource Assessment, Research Agenda and Strategy*. Bedfordshire Archaeology Monograph 9.

The Prehistoric Society and English Heritage (2008) *Research and Conservation Framework for the Palaeolithic*.

Summary Overview of Results

The Archaeological Team assessed 189 potential sites. The archaeological data has been added to the existing summary notes for each site and presented in a Microsoft Excel spreadsheet. The archaeological data has been divided into:

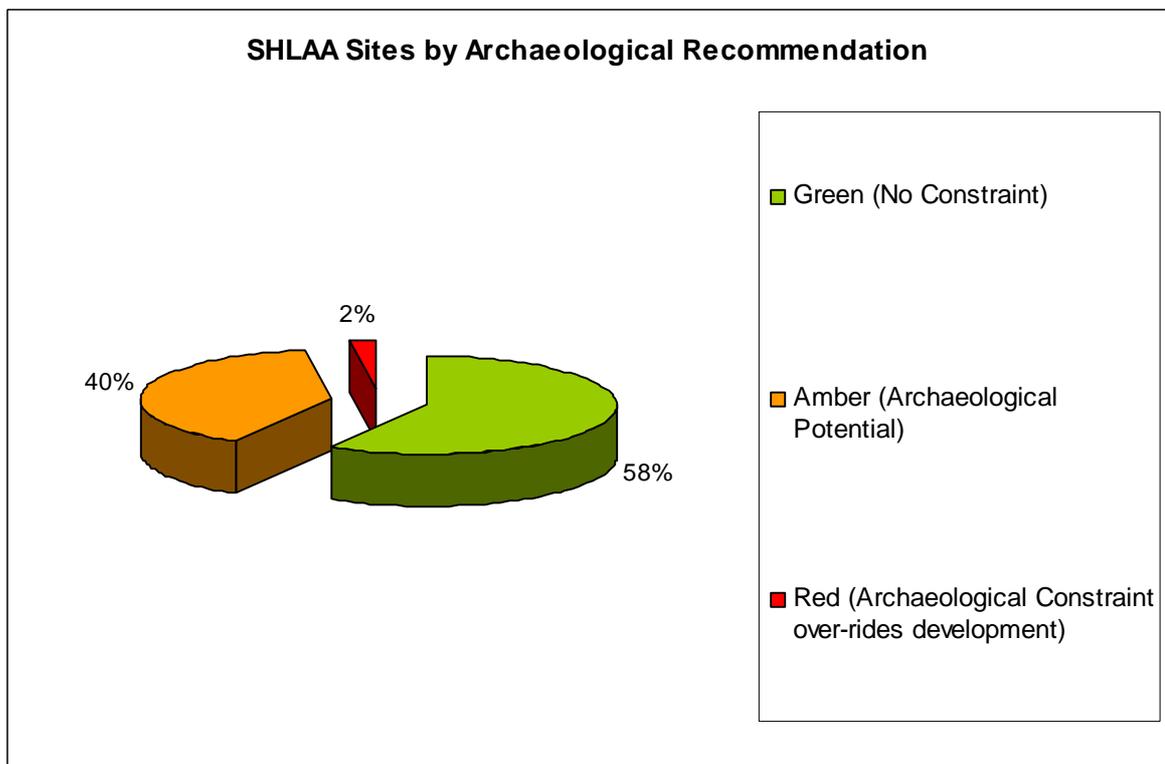
- Archaeological Constraints – this describes the known and potential resource for the site and immediate surroundings;
- Archaeological Recommendation – this indicates whether mitigations is required and is cross-referenced to published local, regional and national research frameworks;
- Archaeological Code – This is a very basic categorisation of the site in terms of its archaeological potential, based on a traffic light system:

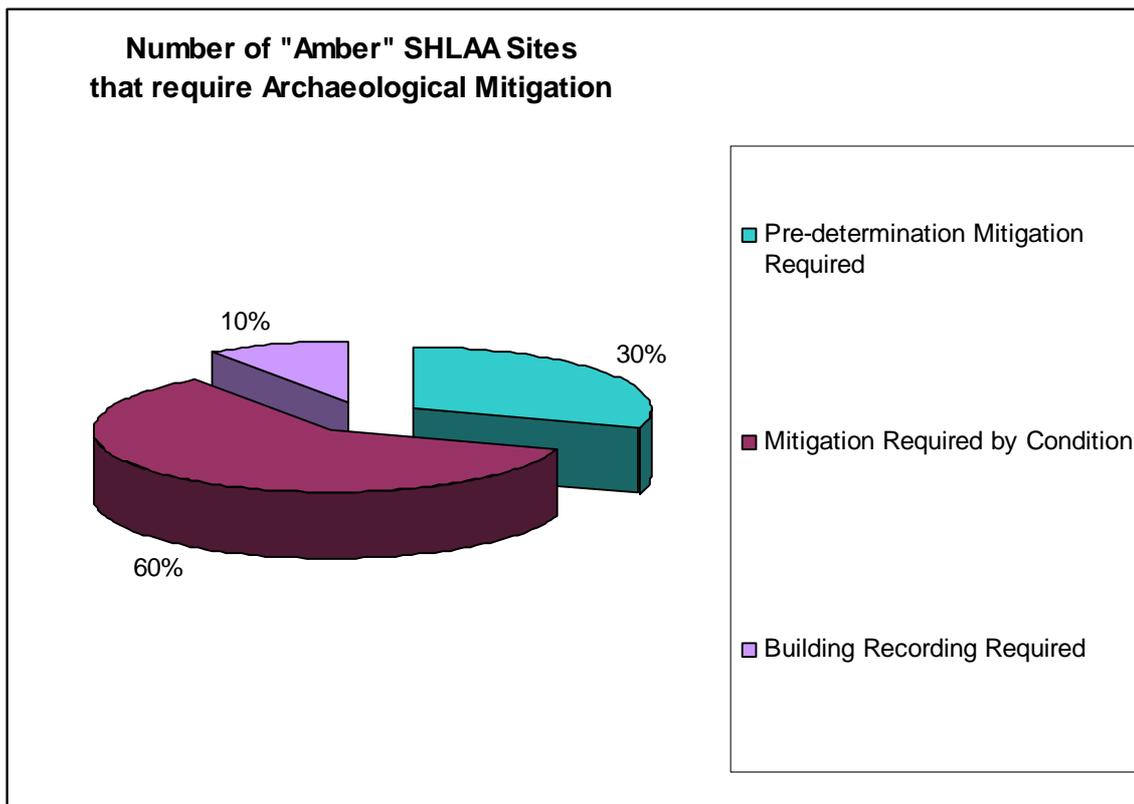
Green = No constraint/potential;

Amber = Archaeological potential;

Red = Archaeological constraint over-rides development.

Of the one hundred and eighty-nine sites assessed, the Historic Environment Record (HER) information indicates that there will be no archaeological constraint to the re-development of one hundred and ten of the sites. Archaeological mitigation will be necessary for seventy-five of the sites; fifty of which can most likely be dealt with by the imposition of planning conditions on any consent issued. Twenty-five of the sites that will require archaeological mitigation may need some form of pre-determination investigation; this may be in the form of trial trenching and/or geophysics. Eight of the sites that require mitigation are likely to need building recording prior to the demolition/conversion of the existing structures on site. A total of four sites have been identified as inappropriate for development due to the adverse affect on the historic environment (see below for specific sites).





SHLAA Sites identified as inappropriate for development:

SHLAA Reference: 190

Address: Arndale Centre

Archaeological Constraint: Site 190 lies within the Plaiter's Lea Conservation Area and includes a number of former hat factories (for example HER 18132 and HER 18131) and sites of former hat factories (for example HER 18134). It also contains two Grade II Listed Buildings; 53 Cheapside (HER 8023) formerly the Cowper Arms temperance tavern or coffee shop (also later a hat factory) and 47 Guildford Street (HER 10331) also a hat factory. The southern part of this site lies within the boundary of the medieval town (HER 16993). Site 190 is also located over the River Lea (it has been culverted at this point) and archaeological remains relating to the medieval and post medieval development of the town (HER 11950) have been recorded at Church Street to the south-east. In addition a kiln site (HER 205) was recorded 1908 just to the south and this is likely to be medieval in date. The town of Luton itself is likely to have originated in the mid to late Saxon period. The Anglo-Saxon chronicles of 571 AD refer to Lygeanberg, a name which has been interpreted to mean "fortified place on the river Lygea", although this could be a reference to Limbury rather than Luton itself. The medieval town (HER 16993) probably originated as a small collection of timber-framed houses located around the Park Square area with a series of roads leading down to bridges and fording points on the River Lea. The earliest crossing point may have been at Church Street and there was a medieval bridge recorded at North Street. It has been suggested that the extent of the medieval town was largely still intact by the 18th century when recorded by Jeffrey in 1765. The main streets in place by the medieval period are thought to be Bridge Street; George Street, Church Street, Park Street, Castle Street and Dunstable Lane, although it is likely they were known by different names. The market place was located in the Market Hill area, at the junction of Castle and George Streets (Albion Archaeology 2003).

Archaeological Recommendation:

The 1880 town plan for Luton suggests that at the end of the 19th century site 190 was densely populated and largely occupied by a combination of residential and small industrial buildings. 47 Guildford Street is one of the more important surviving buildings associated with the hatting industry that once dominated this part of Luton. The significance of this building is recognised by its designated status as a Listed Building and the value of the remaining parts of the built heritage in this area is recognised as part of the Plaiter's Lea Conservation Area. 53 Cheapside is also a Listed Building, which also later became a hat factory but was built as a temperance tavern. The significance of the remaining parts of the built heritage in this area is recognised as part of the Plaiter's Lea Conservation Area. Many of the buildings were formerly hat factories or trades associated with the industry. Understanding the development of the hatting industry and its associated trades such as straw plaiting is a local research objective (see Oake et al, 2007). English Heritage has also drawn attention to the importance of the industry with the publication of the Plaiter's Lea Conservation Area Historic Area Assessment and the forthcoming film/photographic record of Boon and Lane of Taylor Street. The proximity of this site to the medieval core of the town means there is the potential for the recovery of archaeological remains relating to morphology and development. The origins and development of small towns in the Saxon and medieval periods, early town planning and the social and economic development of towns in the post-medieval period have been identified as locally and regionally important areas of research (Ayres 2000, 27-32; Oake 2007, 14-16 and Medlycott 2011, 79-80). As has been demonstrated elsewhere within Luton archaeological deposits can and do survive truncation from recent developments. The archaeological potential of site 190 does not necessarily present an over-riding constraint on re-development. However, provision must be made for the adequate recording of all archaeological remains as a consequence of the development. The nature of the archaeological mitigation will be entirely dependant on the development proposals. The presence of two Listed Buildings within this site area must be considered if this site is allocated. The demolition of these buildings would not be acceptable and therefore if the development of this site would result in the demolition of these buildings, then this site must not be allocated.

SHLAA Reference: 331

Address: Land at Willow Way

Archaeological Constraint: Site 331 lies within a defined archaeological landscape that includes prehistoric monuments such as Waulud's Bank Scheduled Monument (HER 820, SM 29383) and the Icknield Way (HER 353). It is on the edge of an extensive area of Roman occupation (HER 115 and 167). This includes evidence for late Iron Age and early Roman occupation found during building of a housing estate (Hurst Way/Ambleside/Willow Way, to the east of the proposed development site) in the 1950's and again in 2001 (HER 167 and HAT 2001). There were remains of buildings on timber piles in what had been marshy ground, as well as traces of log platforms forming "islands". The site was located beside a crossing point where the Icknield Way (HER 353) forded the River Lea. Pottery evidence suggested that it was occupied from c.200 BC until c.80 AD, when the site at Runfold Avenue (HER 115) replaced it. This may have been because the latter was on higher ground. The Runfold Avenue site (HER 115) which is located to the south-east of the application area is an extensive area of Roman activity, related to material found at Biscot Grange gravel pit (HER 1946), Stony Hill (HER 13529) and Gooseberry Hill (HER 14536). Surface finds are recorded from the early 20th century, and in 1928 part of a substantial building was reportedly found during building work; when the workmen found a floor with a possible mosaic. A small burial group comprising four inhumations, a cremation urn and other pottery was found at Grosvenor Road in 1939. During building work in 1953 in the Runfold Avenue and Wodecroft Road

areas, remains of a settlement running along the Icknield Way were found. The earliest recorded archaeological monument within this part of Luton is Waulud's Bank (HER 820, SM 29383), which is a D-Shaped earthwork enclosure located beside the probable source of the River Lea. The monument is likely to be an Iron Age enclosed settlement; nevertheless numerous small scale investigations have suggested that it may be overlying earlier late Neolithic and early Bronze Age settlement activity. The known archaeological resource suggests that both sides of the River Lea were the focus for a number of small and perhaps interlinked later prehistoric and Roman settlement sites. The site was located beside a crossing point where the Icknield Way (HER 353) forded the River Lea. Pottery evidence suggested that it was occupied from c.200 BC until c.80 AD, when the site at Runfold Avenue (HER 115) replaced it. This may have been because the latter was on higher ground. The Runfold Avenue site (HER 115) which is located to the south-east of the application area is an extensive area of Roman activity, related to material found at Biscot Grange gravel pit (HER 1946), Stony Hill (HER 13529) and Gooseberry Hill (HER 14536). Surface finds are recorded from the early 20th century, and in 1928 part of a substantial building was reportedly found during building work; when the workmen found a floor with a possible mosaic. A small burial group comprising four inhumations, a cremation urn and other pottery was found at Grosvenor Road in 1939. During building work in 1953 in the Runfold Avenue and Wodecroft Road areas, remains of a settlement running along the Icknield Way were found. Traces of timber buildings with wattle and daub were identified, some of which seemed to have been destroyed by fire. The settlement was dated to the 3rd to 4th centuries on coin and pottery evidence, but finds of late Iron Age coins and 1st to 2nd century samian ware may indicate earlier occupation. Features including ditches, pits, hearths and cobbled floors were identified.

Archaeological Recommendation: Development of this site would bring the edge of the built up area much closer to the Waulud's Scheduled Monument encroaching on to one of the most prominent views in to and out of the site which emphasises the relationship of the Monument to the Lea Valley. This would have a major impact on the setting of the Monument affecting our ability to appreciate and understand it. This would amount to substantial harm to its significance of the Scheduled Monument, a designated heritage asset. Therefore, development of the site would be contrary to Paragraph 133 of the NPPF. On this basis Site 331 should not be allocated for development.

SHLAA Reference: 338

Address: Land East of Bushmead`

Archaeological Constraint: Site 338 includes the western edge of a well preserved set of lynchets on Bradgers Hill (HER 209), the earthwork remains of medieval cultivation terraces. Such well preserved examples of this sort of monument are rare particularly in the eastern region. There is evidence of Mesolithic to Bronze Age activity from within the site (HER 15227) and finds of Roman material, suggesting the presence of an occupation site, have been made immediately to the west of the site (HER 698).

Archaeological Recommendation: Development of this site will affect the physical remains of the Bradgers Hill lynchets and a significant impact on their open setting. The setting of a heritage asset forms part of its significance so damage to the setting of an asset will result in a loss of significance. In this case development will so damage the setting of the monument that it would amount to substantial harm to the asset's significance. On that basis this site should not be allocated for development.

SHLAA Reference: 403

Address: 47 Guilford Street

Archaeological Constraint: Site 403 comprises 47 Guildford Street a three storey building of brick construction with prominent stuccoed detailing. It probably dates to the 1840's and was originally a hat factory (HER 10331). It is a Listed Building (Grade II) and is within the Plaiters Lea Conservation Area. The site lies to the north of the medieval town (HER 16993). Site 403 is also located on the north side of the River Lea (it has been culverted at this point). The town of Luton itself is likely to have originated in the mid to late Saxon period. The Anglo-Saxon chronicles of 571 AD refer to Lygeanberg, a name which has been interpreted to mean "fortified place on the river Lygea", although this could be a reference to Limbury rather than Luton itself. The medieval town (HER 16993) probably originated as a small collection of timber-framed houses located around the Park Square area with a series of roads leading down to bridges and fording points on the River Lea. The earliest crossing point may have been at Church Street and there was a medieval bridge recorded at North Street. It has been suggested that the extent of the medieval town was largely still intact by the 18th century when recorded by Jeffrey in 1765. The main streets in place by the medieval period are thought to be Bridge Street; George Street, Church Street, Park Street, Castle Street and Dunstable Lane, although it is likely they were known by different names. The market place was located in the Market Hill area, at the junction of Castle and George Streets (Albion Archaeology 2003).

Archaeological Recommendation: 47 Guildford Street is one of more important surviving buildings associated with the hatting industry that once dominated this part of Luton. The significance of the this building is recognised by its designated status as a Listed Building and the value of the remaining parts of the built heritage in this area is recognised as part of the Plaiter's Lea Conservation Area. Many of the buildings were formerly hat factories or trades associated with the industry. Understanding the development of the hatting industry and its associated trades such as straw plaiting is a local research objective (see Oake et al, 2007). English Heritage has also drawn attention to the importance of the industry with the publication of the Plaiter's Lea Conservation Area Historic Area. As this site contains a well preserved Listed Building which is significant in its own right and makes a major contribution to the Conservation Area its re-development for housing would be inappropriate if it involved demolition of the building as it would amount to substantial harm to a designated heritage asset. This site should not be allocated if its re-development would result in demolition of the Listed Building. It might be possible to convert the building to form accommodation to provide a sustainable use for the heritage asset if such a development will not have a major impact on the historic structure. The proximity of this site to the medieval core of the town means there is some potential for the recovery of archaeological remains relating to morphology and development. The origins and development of small towns in the Saxon and medieval periods, early town planning and the social and economic development of towns in the post-medieval period have been identified as locally and regionally important areas of research (Ayres 2000, 27-32; Oake 2007, 14-16 and Medlycott 2011, 79-80). As has been demonstrated elsewhere within Luton archaeological deposits can and do survive truncation from recent developments. Archaeological mitigation may be required, depending upon the nature of the re-development proposals.