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By e-mail only

Chris McGough McGough Planning Consultants Ltd. 10 Ambassador Place Stockport Road Altrincham WA15 8DB

21 August 2017

Our ref: ND/9603

Dear Chris,

RE: Land off Church Lane and Ashby Road, Gaddesby: Proposed allocation for 30-40 houses (GADD2) in the Melton Mowbray Local Plan

I am writing following my instruction from the Ovens family to provide them with heritage advice relating to the above, with specific reference to the objections raised by Historic England and Leicestershire County Council Archaeological Service (LCAS) to the potential allocation of the above site in Melton Borough Council's emerging Local Plan. This instruction will include giving evidence to the Local Plan Examination should this prove necessary.

I am a heritage consultant with around 35 years' experience of working in the historic environment in both the public and private sectors. Since going into the private sector in 2002, my clients have included a number of Oxford colleges and organisations such as the Bournville Village Trust, The Ministry of Justice, the Universities of Bristol & Coventry, and independent schools such as Abingdon School (see my qualifications and experience at Annexe 1).

My visit to the site was made on 15 August at which time I made myself familiar not only with the site itself, the church and churchyard, but also with the village of Gaddesby as a whole and the surrounding landscape.

In her comments, Emilie Carr of Historic England states that: 'The proposed allocation GADD2 will be harmful to the significance of the Grade I Church of St Luke. The church gains significance from its historic landscape setting which to

its east comprises the earthwork remains of medieval and later cultivation. Both in static and kinetic (moving) views one can appreciate the evolution of the agricultural and land allocation systems which supported the parish community and their clergy. Of particular interest are the apparent phases of cultivation between straighter steam ploughed ridges and earlier horse and oxen ploughed strips. The proposed development would not only cause direct loss to earthwork remains but would also extend the impact of existing bungalow development into main views from the east side of the churchyard and gated lane. As such, the allocation is not considered to be sound in respect of heritage assets'.

These comments are, in my opinion, wide of the mark. While I would be among the first to acknowledge the historic and architectural importance of St. Luke's Church, which clearly fully merits its Grade I listing (a status it has held since 1968), Ms Carr is simply incorrect when she implies that development of GADD2 would be visible 'from the east side of the churchyard'.

In fact, GADD2, while it is visible from parts of the 'gated lane' (really a trackway) to the south of the churchyard, is not visible from any point of the churchyard. This means that in both its existing and potentially developed form GADD2 makes no contribution to the setting of the Grade I listed church as this is perceived from within its churchyard.

As far as views from the trackway on the south side of the churchyard are concerned, it is true that GADD2 can be seen from there (as can the wider countryside beyond), but so can much of the modern development running all the way up Church Lane from Ashby Road and which now forms the immediate setting of St. Luke's Church on the main approach to its churchyard.

Strangely however, Ms Carr makes no comment about this large area of 'standard' modern development, which (quite rightly in my view) is excluded from the Gaddesby Conservation Area, first designated in 1976. Not inappropriately, this modern development is also described as 'incongruous' in the Council's own Conservation Area Character Appraisal.

Ms Carr's statement that the allocation of GADD2 for 30-40 houses would 'extend the impact of existing bungalow development into main views from the

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east side of the churchyard and gated lane' is open to different interpretations. Hers is clearly that it would be harmful, but mine is otherwise. Indeed, as I point out above, GADD2 is not visible at all from the churchyard and although from the 'gated lane' it can be seen, this is in the context of much else that is visible from here, including the 'incongruous' modern development along Church Lane that the Council itself chose to exclude from the Gaddesby Conservation Area.

With regard to Ms Carr's specific reference to 'existing bungalow development', this must be that off Ashby Road directly adjoining GADD2 as the majority of the dwellings on the east side of Church Lane visible from the trackway to the south of the churchyard are actually substantial houses not bungalows.

In this connection it is therefore perfectly reasonable to suggest that, although the allocation of GADD2 would 'extend the impact of (the) existing bungalow development' off Ashby Road, this would not be at the expense of the setting of the church. Furthermore, with careful attention to site layout, density and design at planning stage, extension of built development could actually help to mitigate the unfortunate 'incongruous' form and appearance of the bungalows and the nearby modern development along Church Lane.

In wider historic landscape terms too, the impact of 30-40 houses on GADD2 would be minimised by its low-lying location adjoining the bungalows off Ashby Road. This is important because, although the views of the tower and spire of St. Luke's Church on the descending approach to the village from the south-east along the dead straight section of Ashby Road, beyond the bridge over Gaddesby Brook to the point where Ashby Road meets Gaddesby Lane, are almost certainly accidental rather than planned, these views are nevertheless striking even in summer when trees and other vegetation to some extent obscure them.

These views would effectively be preserved if GADD2 were to be developed, as owing to its low-lying location, it falls outside the line of sight from this section of Ashby Road and would therefore not impinge upon the views obtainable on the descending approach to the village from this direction. Likewise, once the traveller from this direction is over the bridge the land is level and even the

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tower and spire of St. Luke's are less prominent in views from the road than they are from the higher ground to the south-east.

This all means that I can see no justifiable or sustainable ground for removing GADD2 as a housing allocation on the basis that it would have any adverse impact on the setting of St. Luke's Church as a Grade I listed building.

Historic England's other objection (and that made by LCAS) relates to the loss of some of the earthworks associated with the medieval ridge and furrow ploughing and later (Victorian) steam ploughing systems. This is all very well, but fails to acknowledge the critical point, an error also made by LCAS, that the earthworks on GADD2 enjoy no statutory protection whatsoever.

Ridge and furrow earthworks are plentiful in the Midlands and Leicestershire is no exception. Indeed, there are several other fields on the edge of Gaddesby that have such earthworks, including the housing allocation site on the northern side of Pasture Lane. In addition, the earthworks on GADD2 extend without a break well beyond the site's confines to the rest of the large pasture field owned by your client's family, including the portion closest to the church.

In short, there is no legitimate reason why the District Council should regard the presence of unprotected earthworks, associated with either ridge and furrow ploughing or the later (Victorian) steam ploughing system, as a justifiable ground for not allocating GADD2 as a housing site.

I hope you find these observations, which I trust demonstrate that the allocation of GADD2 for housing would not cause any harm in heritage terms, helpful in the representations you will shortly be making to Melton Borough Council on the suitability of GADD2 as a housing allocation site.

Yours sincerely

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