

Development Management

Central Bedfordshire Council

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Your Ref
Date 02 April 2019

Dear Mr Dee,

Application No: CB/18/04252/PAPC
Location: Ampthill And Woburn District Scout Camp Site, Church End, Milton Bryan
Proposal: Pre-application non-householder charge - To house the Museum of Military Intelligence in the former PWE buildings including the Recording Studio

I write in respect to your request for pre-application advice validated on 15 November 2018. As you are aware this advice is based upon a number of internal planning specialists providing advice and takes into account the information discussed at our site meeting on 30 January 2019.

I do sincerely apologise for the delay in responding to your enquiry.

Site description

The site measure approximately 5.5ha. It contains buildings and structures on its eastern side that were predominately constructed in the early 1940s for use by the Political Warfare Executive (PWE) for black propaganda purposes, to provide clandestine broadcasting. The main building is a 2-storey brick structure which contained at least eight recording studios and ancillary offices and facilities. The wider site includes seven ancillary single-storey buildings including a guard house, kennels, garage/diesel house, air raid shelter and several sheds. The use of the site by the PWE ceased at the end of the war. The site has more recently been used by Aspley Guise and Woburn Scout Group.

The principal PWE building is Grade II Listed and many of the remaining coeval buildings are considered to be curtilage listed. The physical condition of all the existing buildings on the site is poor. The interior of the PWE Studio building was badly damaged by and fire in the 1980s. The former PWE Studio building at Milton Bryan is grade II listed and is of such condition that it should be considered a 'building at risk'.

The eastern side of the site away from the main buildings includes a large number of semimature and mature trees, interspersed with grassland, which screen the buildings from the surrounding area. The north western side of the site is open grassland and includes a pond. Public Footpath FP2 crosses the site from the south east to north east corner.

The site is accessed by a single carriageway road from the highway to the north between nos. 23 & 24 Church End. There are a number of residential properties adjoining the south

east boundary. The rest of the site has common boundaries with agricultural land.

The site is within the South Bedfordshire Green Belt and Milton Bryan Conservation Area.

The site is also within the Bedfordshire Greensand Ridge National Landscape Character Area.

Proposed development

Pre-application advice is sought to re-use the existing listed structures for use as an expanded and enhanced Museum of Military Intelligence (MMI), to be relocated from its present site at Chicksands, Bedfordshire. The main element of the proposal is to repair, conserve and remodel the main PWE Studio building in order to create the new museum. There would be some limited works to secondary buildings set within the PWE compound.

The proposal includes:

- Reception and Welcome Area
- Exhibition/Interpretative Galleries, approx. 500 sq.m
- Education Suite, approx. 75 sq.m. including storage and safe guarded WC.
- Small 'Public' Archive Room (with digital access to the 'mother archive' at Chicksands)
- Retail Shop Area
- Café and Kitchen, catering for approx. 60 covers
- Volunteer Room(s)
- Community/Multifunctional Room
- Administrative/Office Suite
- WCs, Storage, Plant Rooms and other ancillary facilities.
- Vehicle Parking for approx. 75-90 cars and 3 coaches, including disabled and staff provision

Externally it is proposed to restore the main building to its 1942 external appearance, including substantial conservation repairs to its damaged brickwork and fenestration, the rebuilding of its missing brick balustrades, and the reinstatement of the prominent multipaned glazed aperture lighting the main staircase in the tower. A new single-storey west wing is proposed to mirror that of the east wing. A new glazed extension is proposed on the upper roof, behind the projecting tower.

The remainder of the site will continue to serve as associated land, which would be used for the promotion of external displays and activities as well as hosting special events. The public right of way, following the 1942 sentry path which runs through the site will be maintained, with the intention that the grounds will remain open to the local public for general amenity use.

Internally the building will be repaired and converted to provide all the principal facilities of the Museum offering. The existing internal fabric will be retained and conserved wherever practical so that the cellular layout of the interior is maintained. Where it is proposed to remove partitions a full archaeological record will be undertaken.

The main entrance to the museum will be the existing/original main doors in the centre of the south elevation.

The groundfloor would include the café, associated kitchen and toilets, retail shop and education suite, with the remainder largely devoted to exhibition and interpretation space.

The entire first floor is dedicated to exhibition and interpretation space. A new lift or an industrial stair would access the second floor level at the top of the tower, which would house an interactive recording studio.

Two possible new access points are proposed to be taken from the highway to the south west of the site adjacent to and to the west of the T-junction with the road to South End.

It is understood that the current users of the site, the Ampthill And Woburn District Scouts, would be relocated to a new site.

National Planning Policy & Development Plan

National Planning Policy Framework (2018):

5. Delivering a sufficient supply of homes
9. Promoting sustainable transport
11. Making effective use of land
12. Achieving well-designed places
13. Protecting Green Belt Land
14. Meeting the challenge of climate change, flooding and coastal change
15. Conserving and enhancing the natural environment
16. Conserving and enhancing the historic environment

Core Strategy and Development Management Policies (North) - 2009

The development plan for the north part of the authority area comprises the Central Bedfordshire Core Strategy and Development Management Policies and Site Allocations DPD adopted in 2009 ("the Core Strategy") and the saved policies of the Mid Bedfordshire Local Plan 2005 ("the MBLP"). Relevant policies are listed below.

CS1 Development Strategy

CS5 Providing Homes

CS13 Climate Change

CS14 High Quality Development

CS15 Heritage

CS16 Landscape & Woodland

CS18 Biodiversity & Geological Conservation

DM1 Renewable Energy

DM2 Sustainable Construction of New Buildings

DM3 High Quality Development

DM4 Development Within & Beyond Settlement Envelopes

DM10 Housing Mix

DM13 Heritage in Development

DM14 Landscape & Woodland

DM15 Biodiversity

Central Bedfordshire Local Plan - Emerging

At present, there is no adopted Local Plan for the whole of Central Bedfordshire. The Regulation 18 Consultation for the new Local Plan for Central Bedfordshire was published on 4 July 2017. A Pre-submission Version (Regulation 19) of the Local Plan for Central Bedfordshire was published in January 2018 and on 30th April 2018 a submission version was submitted to the Planning Inspectorate. However, given its stage of preparation only limited weight can be given to the policies in this document.

Reference should be made to the Central Bedfordshire Submission Local Plan which should be given limited weight having regard to the above. The following policies are relevant to the consideration of this application:

SP2: Sustainable Development

SP4: Development in the Green Belt

SP7: Development within Settlement Envelopes

H1: Housing Mix

H2: Housing Standards

T2: Highway Safety & Design

T3: Parking

EE2: Biodiversity

EE4: Trees, woodlands and hedgerows

EE8 : Greensand Ridge Nature Improvement Area

EE12 : Public Rights of Way

CC5: Sustainable Drainage

HQ1: High Quality Development

HE1: Archaeology and Scheduled Monuments

HE3: Built Heritage

DC1: Re-use of Buildings in the Countryside

Supplementary guidance

A Site Allocations DPD was adopted in 2011 and also comprises part of the development plan. In addition, the Council has adopted the following supplementary planning documents:

-Central Bedfordshire Design Guide - March 2014

-Sustainable Drainage Guidance SPD (2014 – update 2015)

- Landscape Character Assessment (2015)

-Milton Bryan Conservation Area (2006)

Principle of development

Sections 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990 require the Council to determine any application in accordance with the statutory development plan unless material considerations indicate otherwise.

The site is within the countryside outside of a defined settlement envelope. Policy DM4 is the relevant adopted Core Strategy but this policy appears unduly restrictive with regards to rural business development, and as such is not fully consistent with the NPPF.

It is necessary therefore to assess the principle of development in relation to guidance contained within the Framework.

At paragraph 83 (Chapter 6 - Supporting a prosperous rural economy) the Framework states that planning policies and decisions should enable: (a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings; and (c) sustainable rural tourism and leisure developments which respect the character of the countryside.

It is considered that the proposed museum use could be regarded as a 'business' for the purposes of Chapter 6.

Paragraph 84 goes on to state, 'decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist.'

The site is also washed over by the South Bedfordshire Green Belt, where restrictive planning policies apply. However, this is not considered to be an overriding factor. Paragraph 146 of the NPPF states that certain forms of development are not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it. These include the re-use of buildings provided that the buildings are of permanent and substantial construction and material changes in the use of land such as changes of use for outdoor sport or recreation. Whilst the proposal does include some new build elements e.g. west wing, this is very modest, rebuilding a previously demolished element, which it is considered would not harm the openness of the Green Belt.

The proposed car park would be intrinsically linked to the museum use but is usually regarded as being inappropriate development within the Green Belt. As part of an application 'very special circumstances' would need to be provided to justify this element. This matter is unlikely to be an overriding factor in the determination of the scheme.

Broadly speaking, notwithstanding the car park/Green Belt matter, the proposed development is considered to be acceptable in principle subject to compliance with relevant policies listed above and any other material considerations.

Design and conservation

Design is at the heart of the planning system. The NPPF states that, 'The creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work'. The NPPF requires that developments are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;

are sympathetic to local character and history including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change.

Central Bedfordshire Council's Design Guide sets out the key principles and standards to ensure the delivery of high quality design in Central Bedfordshire. All proposals must take account of its guidance. Details can be found at the following link:

<http://www.centralbedfordshire.gov.uk/planning/design/info.aspx>

The site is within the Milton Bryan Conservation Area. The Milton Bryan Conservation Area Appraisal (2006) make reference to the historic interest of the PWE building. Conservation Areas are areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance. Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires that when assessing planning application within Conservation Areas special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.

Section 16 and 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (LBCA) require that in considering listed building consent applications or planning applications which affect a listed building or its setting, the local planning authority 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.

Para. 189 of the NPPF states that, 'In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary'.

Para. 193 states that, '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 (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance'.

Para. 196 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 including, where appropriate, securing its optimum viable use.'

Para. 200 states 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. 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.'

The list description is extensive and with regards to its historic significance makes the following summary:

* Historical interest: The PWE was part of Britain's secret war against

Nazi Germany. The building's plan form and surviving detail directly illustrates its function and historical associations.

* Intactness: The structure, fabric and plan of the building survives

largely intact, including recording studio. Some internal fixtures and detail also remain in place.

* Rarity: The building is unique, the only studio purpose built to

broadcast programmes to Germany as part of the 'Black propaganda' campaign devised by Sefton Delmer.

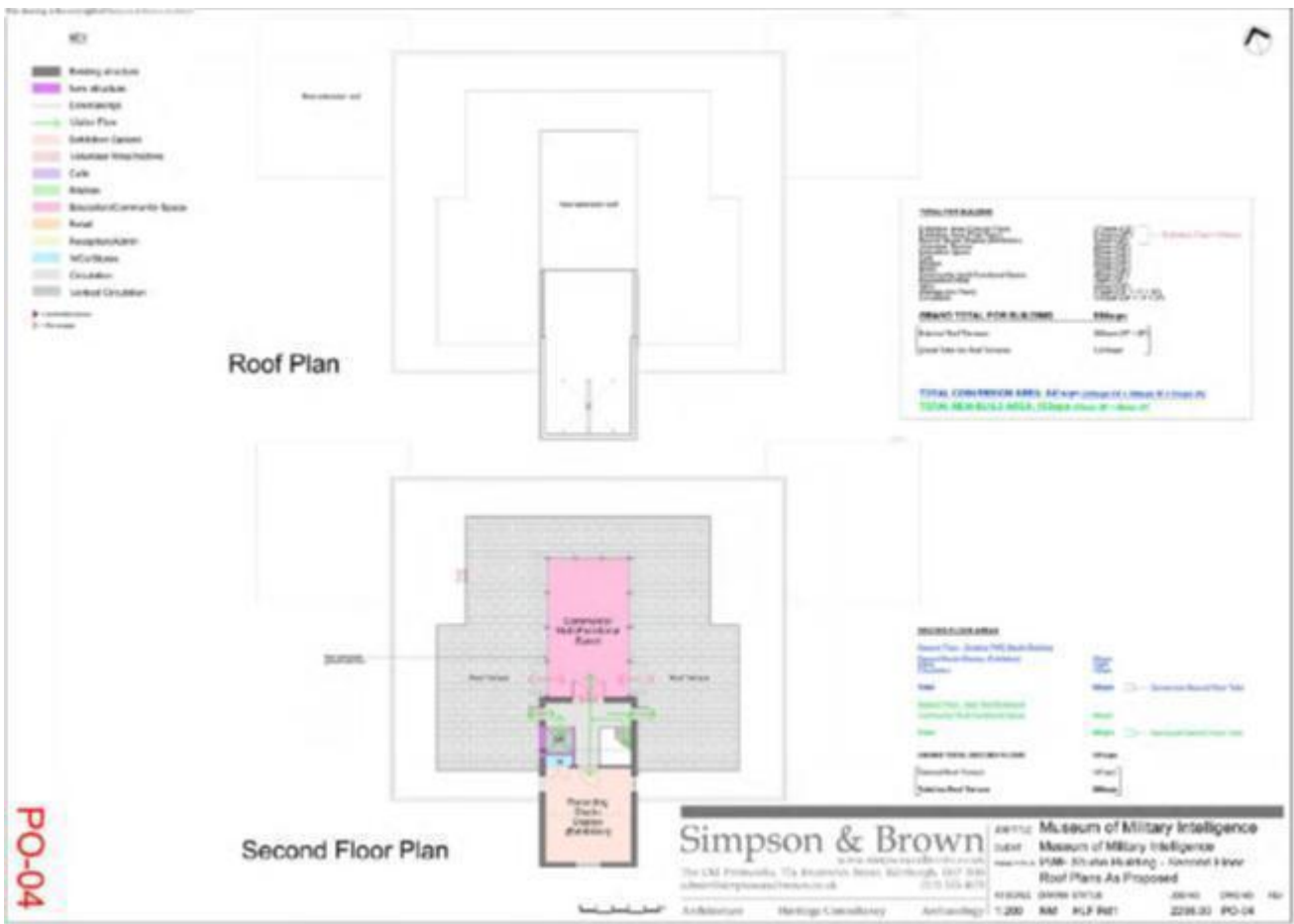
* Architectural interest: The building is deliberately unexceptional for

the period, but its design is thoughtful and its proportions well considered.

*Historical association: The studio building has a historical association with the Grade II listed blocks and huts at Bletchley Park, Milton Keynes, eight miles to the west of Milton Bryan, and with another PWE structure, Building No. 3, 'The Cinema', at Crowborough, Sussex, listed at Grade II.

The proposed layout and elevation plans are shown below.





The Conservation Officer has provided the following comments:

The former PWE Studio building at Milton Bryan is grade II listed and is of such condition that it should be considered a 'building at risk'. Sustainable and sympathetic proposals for the reuse of the building and site (which includes associated outbuildings of similar considerable historic interest) are therefore to be welcomed.

The proposal for the MMI presented in the Concept Design (Simpson & Brown, August 2018) of the current submission can be considered the 'optimum viable use' for the building.

The Statutory List description places particular significance on the architectural character and layout of the building, a building designed and set out with a specific function in mind. This function (and special interest) is reflected in the 'service' structures surviving on the site, which are themselves 'curtilage listed buildings' – namely:

- the outpost/(gate) guard house
- former diesel house and fire station (garage building)
- MoWP Type 2 huts
- kennel building
- air raid shelter
- surviving sections of boundary fence (dated 1943 by Simpson & Brown)

The principal building retains elements of prefabricated building construction (concrete flooring) and original fit-out (electrical fittings, air-handling equipment, washing facilities and acoustic tiling) of intrinsic interest and value. The fixtures and fittings themselves, through their appearance, have particular resonance and consequent value in conveying the building's essential *sense of the past* and every effort should be made to preserve them in situ.

Mindful of the strong 'significance' of linked building design, layout and function displayed by the principal building and the type and character of associated structures surviving on the site, and in consultation with the Planning Case Officer, I have considered in detail the proposals for the principal building and site set out in the Concept Design, and offer the following comments and advice:

(Principal building)

I will support the proposed MMI scheme set out in Simpson & Brown Concept Design Drawings PO-03, PO-04 and PO-05 strictly subject to the following:-

- The complete omission of the glass 'multi-functional space' rooftop structure, and the complete prohibition of public access to the rooftop.
- A complete and convincing justification for the removal of the chimney structure associated with the post-war Caretakers accommodation (the chimney [and associated fireplace] is directly noted in the Statutory List description and reflects an event, if only secondary, in the 'story' of the building).
- The first-floor shower rooms and WC's (Rooms F9, F10 and F11), with all surviving fixtures and fittings are retained, conserved and appropriately displayed.
- The 'blocking' of any window opening (such as proposed in association with new Plant Room on the east side of the ground floor) retains any window framing in situ,

and appropriately reinstates framing where missing, and 'blocking' is restricted to installation of an inner 'screen' structure as appropriate.

-The outer (west) partition wall of the former Switchboard Room (G21) is not removed to create access to the Museum Shop (as currently shown), and access is created by an appropriate doorway made in a retained floor-to-ceiling partition structure.

I will be unable to support, under any circumstances, the suggested future southward extension of the Café and Retail Area/Male WC ('ghosted' on Simpson & Brown Concept Design Drawing PO-03), and this should be duly noted.

(Curtilage listed buildings)

The attached particular 'significance' of these buildings (and boundary fencing) has been highlighted above. I am happy to support the proposed adaptation and extension of the garage building (the former diesel house and fire station) proposed in Simpson & Brown Concept Design Drawing PO-06.

I will welcome, and review with similar scrutiny, appropriately sensitive and sustainable detailed proposals for the remaining curtilage listed structures (including retention, preservation and appropriate display of the surviving boundary fencing).

Residential amenity

The proposed re-use of the site for use as a museum would significantly increase the use of the site compared to the existing use by the Scouts. Despite the increased comings and goings it is not considered that this would be an overriding factor in the determination of the application, provided that the hours of use are strictly controlled. Any future application will clearly need to outline how the site and its buildings are to be used and at what times of the day and week.

In comparison to the existing substandard vehicular access, the location of the proposed new access will help to reduce the impact of traffic on the adjacent residential properties.

Despite the presence of trees on the boundary with the adjacent residential properties, Officers do have concerns regarding public access to the rooftops. This could create future overlooking problems and should be removed from the proposal.

Highways

The existing access is substandard. Any increase in use would harm highway safety. The options for the proposed access are shown below located to the south west of the site.



The concept design for the museum will also include, a recording studio, archive room with links to Chicksands archives, an education suite, shop, café with 60 covers, volunteers room, admin office at the extended and existing garage, office in the building and multifunctional room. There will also be events held at the site.

The proposal is for 90 vehicle parking spaces, 3 coach parking spaces, disabled and staff parking and an overflow car park for events. The scout building may be moved, but there is little information with regard to how the scout camp fits into the overall proposal? The proposal is still very fluid in terms of what is being proposed and therefore the highway comments will be very basic.

The concept design gives the option of 2 accesses to the site, but the red line plan only indicated 1. The concept design shows an access located opposite the junction with the unclassified road UC190 (Milton Lodge/Park Road). This is within the 30mph speed limit and will require a splay of 2.4m x 43.0m, which will require the removal of quite a large envelope of hedgerow and trees. The location of this access is not satisfactory as the proposal will create a crossroads and the likelihood of conflict between vehicles.

The alternative access is west of the site and located at an existing field access. This is preferred and although taken from a national speed limit road, there is adequate driver/driver intervisibility to the junction with London Road A4012 to the west (the critical side to the oncoming traffic) and to the east to the apex of the bend and within the 30mph speed limit. For information: this location also requires limited removal of hedgerow and trees. There is unlikely to be any conflict between vehicles at this location. Is this access available as it is not shown within the red or blue line plan? It is also noted, there is no means of getting to the site other than by car. Sustainable means of transport should be provided. The applicant should look into upgrading the footpath network from Woburn, or providing a new footpath link from Woburn, or extension of the existing public metalled footway along London Road from Woburn. Secure and covered cycle parking provision will also be required, for staff and for visitors.

The junction should be designed so that vehicles will not be obstructing the free flow of traffic on the highway, therefore, if the access is gated/barriered, consideration should be taken of the location of the gates/barriers so that vehicles do not back up and cause queuing within the highway. Vehicle (car) parking spaces should measure no less than 2.5m x 5.0m with 6.0m at the frontage of the space to allow vehicles to manoeuvre into/from the space. A delivery vehicle space will be required for the café.

Details of the recording studio user groups:

So that adequate parking can be ascertained please confirm whether parts of the site will be independent to the museum; the opening times of the café differing, use of the education suite and any function rooms outside of the opening hours of the museum.

Details of refuse collection and location:

Is the site going to use a private company for collection of waste or the council waste services ? (be aware the council refuse vehicle is 11.5m length and manoeuvring will be required for this size of vehicle; it is suggested the applicant liaise with waste services)

Parking guidance is as follows:

Museums: 1 space per 40m²

Café: 1 space per 25m²

Office: 1 space per 25m²

Education: 1 space per 2 staff and 1 space per 15 pupils

At least one plan should indicate the visibility splay. A plan should show the parking layout (inclusive of overflow parking area) and surfacing. Tracking diagrams of the largest vehicle entering the site at the junction and leaving the site. Pedestrian link from Woburn.

Please provide information of the events expected to be held at the site. Will these include overnight stays/pitches?

Trees & Landscape

The Tree & Landscape Officer has provided the following comments:

'I have examined the plans and documents associated with this Pre-Application Advice, and note the large number of trees within the site, many of which are self sown, and either in actual or potential conflict with the existing buildings, where their removal would need to be accepted in such circumstances. However, trees should be retained where possible, in order to complement the building form, to retain a sense of historic place, to screen the car park, and to maintain the rural character of the surrounding landscape.

Of particular concern are the choice of new access points being proposed in and out of the site. The required visibility splays required for these access routes would extend well beyond the actual opening onto the highway, and could result in the removal of a substantial length of hedgerow and trees along the frontage of what is an attractive rural road leading to the village of Milton Bryan . The positioning of any new access must be done in a way that minimises the need for large areas of hedgerow to be removed for visibility splays, but even so the potential adverse impact caused by the loss of roadside hedgerow could be unavoidable. The new interior access road, located between the proposed entrance/exit and the new car park, is likely to encroach over the Root Protection Area of trees as it runs close to and parallel with the strategically important roadside boundary planting. Mitigation measures would need to be identified, and then successfully incorporated into the design; either the road needs to be moved further away from the boundary planting, or the new

access road needs to be built on a "No-Dig" cellular confinement system.

I therefore recommend that the application stage proposals are presented only after reference to a BS 5837 : 2012 Tree Survey and Tree Constraints Plan, prepared by a suitably qualified arboriculturist, which allows the designer to have an informed choice regarding the safeguarding of trees considered appropriate for retention and protection within the site. The designer can also then recognise the need to mitigate against potential damage to strategically important roadside hedgerow and tree belts situated along Church End, and any important trees identified within the site interior, especially those around the new car parking area.

The application can then be supported by a Tree Protection Plan and an Arboricultural Method Statement, to demonstrate that tree protection measures have been adequately considered in the design process.'

Suitable planting should be provided on the northern side of the new access to mitigate its impact on the wider landscape. Similarly, if necessary, additional planting should be provided around the proposed car parking area to ensure that it is not visible in the wider landscape.

Public Rights of Way

The Rights of Way Team has stated that:

'It appears from the plan submitted that a new vehicle access to the site is to be created and that this will cross Public Footpath no. 2. So the first matter which will have to be considered in any further application is how the crossing of the Public Footpath by the new access road will be dealt with. Detail will need to be provided on type of crossing, surface, visibility and signage. It will be essential that there is good design so the impact on the Public Footpath and its use is minimised.

The overflow car park mentioned should not affect the public footpath in any way and so further detail will be required about this in any further application. I have read the comments of my highways development control colleague, Michelle Edwards, and would support all of these. Of particular note is the comment as to how this change of site use will remain compatible and work with the existing scout camp site.

Michelle makes a very valid point that this looks like a big scheme and therefore should we not be looking at wider matters, especially if the proposals form part of a HLF bid or bids. Michelle is correct in her observation that there seems to be no means of getting to the site other than by car and that sustainable means of transport should be provided. There is a good public rights of way network connecting the site to Woburn Park and Woburn Abbey and so would it not make sense to link the two 'visitor attractions' together by a meaningful, all weather route so that people could easily access the site on foot and by cycle rather than the car? I am not greatly familiar with the site but is part of Public Footpath no. 2 already hard surfaced? Is there any intention to surface the whole route through the site as part of these proposals? There is a mention on page 37 of the report that the Public Footpath is to be "repaired" - more information would need to be provided as to what is proposed but ideally the route should be improved/enhanced to add a sustainable walking and cycling option to the site rather than just repaired.

I would agree with Michelle that the applicant should look at what could be done to provide a sustainable walking and cycling route to the site, whether this be an upgrading of the existing public rights of way, a new footpath link or an extension of an existing footway. I am happy to be involved in further discussions.

Finally the report submitted refers in brief to new utilities provision. These may affect the

public rights of way in the area in terms of temporary closure/diversions of the paths to allow installation, so the costs of that needs to be factored into any budget for the site.'

Archaeology

The Council's Archaeology Team has stated:

The proposed development site is located in an area which contains medieval ridge and furrow earthworks (HER 4434) and on the edge of the historic core of the settlement of Church End in the parish of Milton Bryant (HER 16917). The site is also occupied by the buildings associated with Second World War Political Warfare Executive Studio (HER 1441). The studio itself is Grade II Listed Building (NHLE 1401210) a designated heritage asset.

Under the terms of the National Planning Policy Framework (NPPF) these are heritage assets with archaeological interest. Milton Bryant is first recorded in the Domesday Survey of 1086 AD and, therefore, has its origins in at least the Late Saxon period. At that time the two main landowners in the parish were Hugh the Beauchamp and the bishop of Bayeux. It has been suggested that this land division may represent existence of two Manors in the parish in the early medieval period.

However, during the medieval period Woburn Abbey gradually acquired all previously divided land. It was held by the Abbey until Dissolution of the Monasteries in the 16th century and was passed on to subsequent owners as a single estate (Bennet 1979). The settlement pattern in Milton Bryant is known as dispersed or "polyfocal", with at least two different small hamlets comprising Church End (HER 16917) and South End (HER 16918). Whether one of these settlement areas is older than the other is not known. It is possible that these two separate settlements represented two Manors recorded in the Domesday Survey.

A 17th century Manor House (HER 5771; NHLE 1113976) is located in South End (HER 16918) while medieval moated site (HER 9998) and the 12th century parish Church of Saint Peter (HER 3982; NHLE 1138238) lie in the Church End. The application site is located on the north-west edge of the Church End, approximately 100m from the church. Parts of it contain earthwork remains of ridge and furrow field system (HER 4434). Ridge and furrow earthworks largely represent the upstanding remains of medieval arable cultivation. Prior to the Parliamentary Acts of Enclosure in the 18th and 19th century and the agricultural advancements prompted by the industrial revolution most Bedfordshire would have been cultivated in this fashion. Ridge and furrow is created by ploughing the same strip of land repeatedly with a non-reversible plough. Medieval ploughs were single-sided and therefore only turned the soil over in one direction, meaning that the plough could not return along the same furrow. Therefore, the ridge would have been ploughed up one side and down the other with the resulting furrows providing drainage. Each settlement would have had several common or open fields and families would have worked several strips each (although often not all in the same place). A common village crop rotation system would have been adopted with some fields lying fallow whilst others were cultivated on a seasonal basis.

The value of ridge and furrow has been recognised nationally by Historic England: in the 1990's its predecessor, English Heritage commissioned mapping of surviving ridge and furrow across much of the Midlands as part of its National Monuments Protection Programme (NMPP). This was done to identify areas for statutory protection. This clearly demonstrated that of the eight counties surveyed; ridge and furrow is least well preserved in Bedfordshire, and in Central Bedfordshire, less than 4% of ridge and furrow cultivation remains now survive as earthworks. This means we consider those areas of ridge and furrow earthworks that do survive to be important. The Central Bedfordshire Council Archaeology and Historic Environment Teams continue to identify both extant earthwork

ridge and furrow and traces of sub-surface remains; this is undertaken because it is recognised that the medieval/post medieval field systems in Bedfordshire differ from those in the rest of the eastern counties; our field systems are in fact more akin to the classic midland systems of Northamptonshire to the north and Buckinghamshire to the west. This distinctiveness from the rest of the eastern counties is recognised at a regional level and further research into the origins and development of Bedfordshire's unique field systems are a regional research objective (Oake et 2007), as endorsed by English Heritage (now Historic England). Although the remains of ridge and furrow cultivation were identified on site and no buried heritage assets related to Saxon or medieval settlement have been recorded in the vicinity so far, it could be simply the result of the lack of archaeological investigations. Evidence from other settlements in Central Bedfordshire, for example, Stotfold, Marston Moretaine and Langford, have shown that Saxon and medieval settlement pattern was fluid and dynamic with the remains of substantial occupation located away from the present village cores. It is therefore possible that buried archaeological remains may be present on the site.

During Second World War the application site was utilised by secret Political Warfare Executive (PWE), created in August 1941. Milton Bryan Studio (known as MB) was one of two studios used by this organisation for producing and broadcasting 'Black' (clandestine) propaganda but the only one to be purpose built; the other was a country house, Wavendon Tower, about six miles to the north. The PWE commissioned Sir Edward Halliday CBE RP RBA ARCA (1902-84) to design the studio at Milton Bryan.

A complex of buildings was erected on site in approximately 1942. The main building was a broadcasting studio, which is Grade II Listed Building (HER 1441; NHLE 1401210), with ancillary structures such as two air shelters, military huts, guard house, Diesel House/Fire Station and kennels. English Heritage awarded the studio a Grade II status in 2011, citing the following reasons:

- Historical interest: The PWE was part of Britain's secret war against Nazi Germany. The building's plan form and surviving detail directly illustrates its function and historical associations.
- Intactness: The structure, fabric and plan of the building survives largely intact, including recording studio. Some internal fixtures and detail also remain in place.
- Rarity: The building is unique, the only studio purpose built to broadcast programmes to Germany as part of the 'Black propaganda' campaign devised by Sefton Delmer.
- Architectural interest: The building is deliberately unexceptional for the period, but its design is thoughtful and its proportions well considered.
- Historical association: The studio building has a historical association with the Grade II listed blocks and huts at Bletchley Park, Milton Keynes, eight miles to the west of Milton Bryan, and with another PWE structure, Building No. 3, 'The Cinema', at Crowborough, Sussex, listed at Grade II.

Although the ancillary structures to the main building are not listed, they form part of the setting of the listed Wireless Studio and contribute to understanding of the function of the whole complex. Due to that they are significant despite their current dilapidated or altered state.

This application proposes re-development of the site to house Museum of Military Intelligence. The existing structures would be converted to accommodate the new the museum. It would entail repairs, conservation and remodelling of the studio building, together with works to some of the other buildings set within PWE compound as well as other site wide interventions aimed at improving access and amenity (this includes provision of the car park for 90 vehicles, 3 coaches, disabled and staff parking provisions and an overflow car park).

The Concept Design – RIBA Stage 2 Report (Simpson & Brown 2018) submitted with this pre-application enquiry states that Cultural Heritage Assessment has been commissioned and undertaken on site, this document was however not submitted with this application.

The site contains complex of PWE buildings associated with Milton Bryant Broadcasting Studio which was used to disseminate “black” propaganda during Second World War. The

Studio is Grade II Listed due to its significance, function and historical associations. The site also contains remains of medieval cultivation in form of ridge and furrow and has the potential to contain buried archaeological deposits related to the origins and development of settlement of Church End in Milton Bryant parish. Paragraph 189 of the NPPF states the following regarding applications that have the potential to affect heritage assets: "In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation."

This requirement is echoed by the adopted Central Bedfordshire Design Guide (March 2014).

Recommendation:

The scale of the proposals means that they will have a negative and irreversible impact on any surviving archaeological remains present at the site. Therefore, should a planning application be submitted it must be accompanied by an archaeological Heritage Statement. The Heritage Statement must comprise the results of an archaeological evaluation of the site consisting of a measured earthwork survey of the surviving earthworks on site that are going to be affected by the development (that complies with Level 2 recording as specified in the Historic England “Understanding the Archaeology of Landscapes” A Guide to Good Recording Practice) and a measured survey of the historic buildings present on site (that complies with Level 2 recording as specified in the Historic England “Understanding Historic Buildings: A Guide to Good Recording Practice (Historic England 2016). The results of the evaluation, together with any technical details on the construction methods to be employed, has to be used to assess the level of impact the new proposed development will have on historic buildings and any surviving archaeological remains at the site. The archaeological Heritage Statement

must be compiled by a recognised archaeological specialist and details of local contractors can be found by consulting the Chartered Institute for Archaeologists (CIfA) website: www.archaeologists.net/ro.

If the applicant or their agent wishes to discuss this matter further they can contact the Archaeology Team at Central Bedfordshire Council directly on: 0300 300 6879 or

6603 or 6029 - archaeology@centralbedfordshire.gov.uk.

Please note: should a planning submission be made without the required archaeological information it is possible that the application will be considered “invalid” because it fails to meet with the Central Bedfordshire Council Planning

Validation Checklists, paragraph 189 of the NPPF and the advice given in this pre-application response. Applicants and their agents should also be aware that the

Archaeology Team may object to any planning application where they feel insufficient information has been provided to assess the impact of development proposals on heritage assets with archaeological interest (this advice is in accordance with Chapter 16 of the NPPF).

Ecology

The Council's Ecologist has stated that:

'The site lies within the Greensand Ridge Nature Improvement Area and so development, in line with the 2018 NPPF, should demonstrate net gains for biodiversity can be delivered.

Given the potential for roosting / nesting opportunities on site for bats and birds any future application would need to be supported by an Ecological Appraisal. This would indicate any potential protected species interest on site, should such an interest be found it may be necessary to undertake further surveys.

The results of these surveys and details of proposed mitigation would need to accompany an application. The pond and land beyond the built footprint should also be assessed both for ecological impacts but also in determining opportunities for enhancements. Depending on constraints associated with the building listing the use of a green roof may be an option.

CBC now hold a District Licence for Great Crested Newts and the applicant should contact NatureSpace UK for more information if required.'

Flood Risk Management/SuDS

The site is within Flood Zone 1 which has a low risk of flooding. The flood map indicates that the north west corner of the site has 1 in 1000 year chance of surface water flooding.

As part of an application you will need to have regard to the Central Bedfordshire Sustainable Drainage Guidance SPD (2014 – update 2015):

<http://www.centralbedfordshire.gov.uk/planning/flooding/suds.aspx>

The guidance outlines the drainage details that would need to be submitted with an application.

Pollution

Please note if your proposed development would benefit from Environmental Health advice there will be additional charge for this work at 20% of the pre-application planning fee. Please contact pollution@centralbedfordshire.gov.uk to discuss how the service can assist.

Conclusion

The project appears to be an interesting and important way to showcase the history of

Central Bedfordshire and the history of military intelligence. The planning department is supportive of the aims of bringing a Grade II Listed Building back into an active use.

It is considered that the re-use of the site and structures constitutes appropriate development in the countryside and Green Belt. The proposed car park is considered to be inappropriate development in the Green Belt which require 'very special circumstances' to be demonstrated. Justification should be made with reference to the benefits of the proposal.

Notwithstanding the proposed glazed element on the roof and other concerns raised by the Conservation Officer, it is considered that the alterations required for the listed building's re-use are regarded as 'less than substantial harm'. This harm would be low level and the public benefits that would accrue from the re-use of this building at risk would certainly outweigh the limited harm. The proposed museum use could be considered to be the optimal viable use for the building.

As discussed above, careful consideration of the Listed Building will need to be at the heart of the development, and all works to restore and repair will require Listed Building Consent, which should be accompanied by survey reports and schedule of works. Planning permission will also be required for many external works such as the proposed west wing, changes to the east wing, new openings, re-instated brick parapets and railings, and works to the garage.

The proposed access to the west of the T-junction is considered to be appropriate subject to full highway details. Suitable planting should be provided on the northern side of the new access to mitigate its impact on the wider landscape. Detailed information regarding the car park, its landscaping and drainage will also be required.

Please discuss the opportunities to provide enhancements to the local public rights of way network, as outlined by the Rights of Way Officer, prior to submitting a planning application.

Requirements for validation of a planning application

Planning permission and Listed Building Consent would be required for the proposed development.

Planning applications can be submitted online using the planning portal website <http://www.planningportal.gov.uk/planning/applications/planningapplications> alternatively, forms are available to download on our website <http://www.centralbedfordshire.gov.uk/planning/forms/full.aspx>

As part of any future application the following documents would be expected:

- A Design and Access Statement, justifying and explaining the proposed development.
- A site location plan, detailing the application site with a red outline.
- A block plan, detailing the car parking and access arrangements (including achievable visibility sightlines)
- Elevations and floor plans of the proposed development
- Heritage Statement
- Archaeological Heritage Statement
- Surface water drainage strategy
- Preliminary ecological appraisal
- Details of biodiversity net gain
- BS 5837 : 2012 Tree Survey and Tree Constraints Plan, prepared by a suitably qualified arboriculturist
- Tree Protection Plan and an Arboricultural Method Statement

Please note that the comments given above shall be considered as a material planning consideration in the determination of any subsequent formal application.

However, the weight which can be attributed to this advice will diminish over time when policies and site factors change.

Finally, please note that a formal decision can only be made in response to a planning application, whereby third party consultations are likely to be undertaken which may raise further issues that have not been considered as part of this response. As such, this advice is for guidance only and does not bind the formal consideration of any planning application by the Local Planning Authority.

Yours sincerely,

James Clements
Senior Planning Officer