APPENDIX ES9.1

HERITAGE STATEMENT

AU/CH/SPS/1774/01/ES/FV

February 2024





consultancy | project management | expert witness

Cooks Hole Quarry and Thornhaugh Landfill Site Peterborough



Heritage Statement February 2024

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Cover photograph: Aerial Photograph of PDA, 2020

1. Introduction

1.1 SCOPE OF THIS REPORT

This Heritage Statement, that focusses on the setting of heritage assets, was commissioned by MJCA on behalf of Augean South Limited (Augean), and presents the findings of a cultural heritage assessment for a proposed revised restoration scheme at Cooks Hole Quarry (Cooks Hole) and Thornhaugh Landfill Site (Thornhaugh), Peterborough, **Figure 1**.

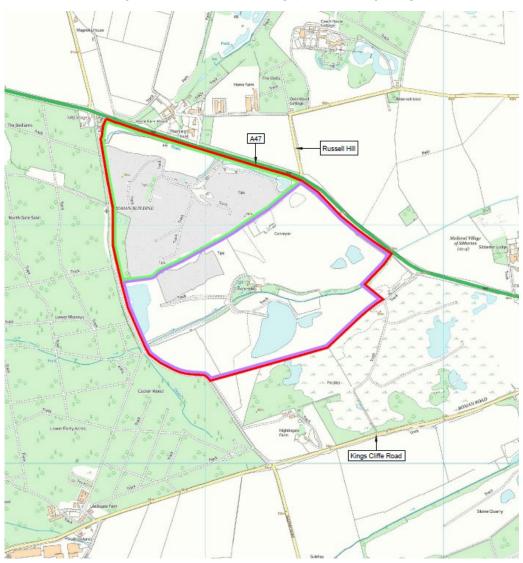


Figure 1 Location of Proposed Development Area © Crown copyright. All rights reserved. Licence number 100043831

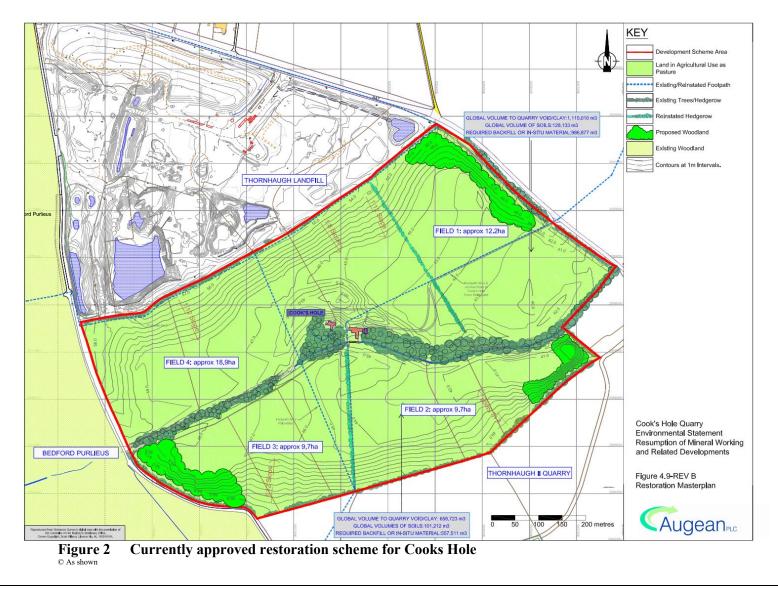
The Proposed Development Area (PDA) is centred at approximately TL 05053 99895. The currently approved restoration scheme for Cooks Hole is shown on **Figure 2** and the currently approved restoration profile for Cooks Hole is shown at **Figure 3**., the currently approved restoration for Thornhaugh is shown on **Figure 4**. The proposed restoration profile is shown at **Figure 5**. Further drawings are included in the Environmental Statement.

In brief, the following description of the proposals is relevant to Heritage.

Cooks Hole is an active mineral extraction site which has been worked since about 1948. Thornhaugh comprises an active landfill site which is being filled in phases. Thornhaugh landfill has been operational since the 1990s, the mineral extraction being prior to this. The sites have a complex planning history and have been worked by various operators, however the overarching principle of both sites is to restore them to a beneficial afteruse. The approved restoration scheme for Cooks Hole is to a low level and comprises agricultural grassland with some tree and shrub planting. The approved restoration profile for the north eastern corner of Cooks Hole is to return to original ground levels. The approved restoration scheme for Thornhaugh comprises a mixture of woodland, hedgerows, shrub and scrub and calcareous grassland.

Augean is proposing to revise the restoration profile for Cooks Hole and Thornhaugh to provide an integrated, coherent landform for both sites. The proposed restoration scheme would extend the habitats from Thornhaugh to Cooks Hole so that a wider mix of habitats is available across both sites. In addition, there is the potential for the restoration to tie in with wider aspirations for the enhancement of Rockingham Forest, to create green infrastructure links with Bedford Purlieus and for the proposals to contribute to landscape scale recovery.

A single planning application is being submitted for the revised restoration profile for Cooks Hole and Thornhaugh. The planning application will include the continuation of the mineral processing operations at Cooks Hole and the continuation of the existing operations at Thornhaugh (construction of phases, landfilling and processing of waste) and changes to the order of the phasing at Thornhaugh.



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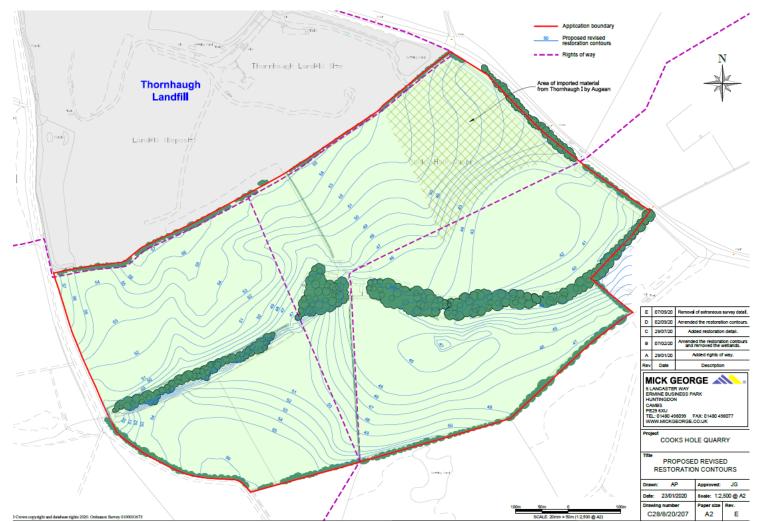


Figure 3: Currently approved restoration profile for Cooks Hole

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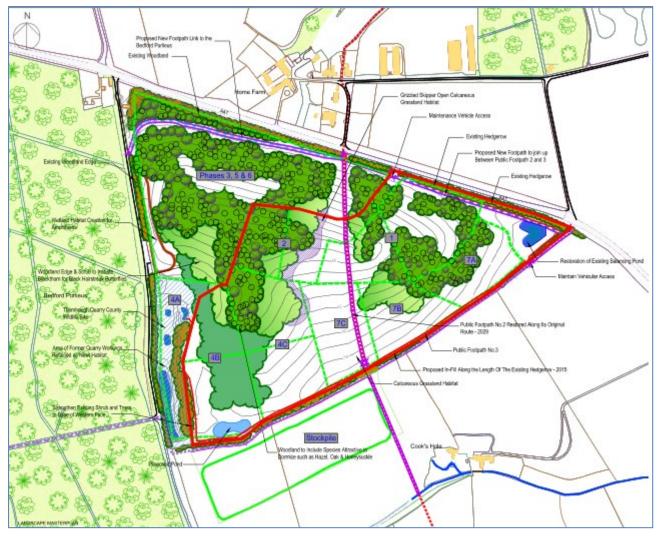
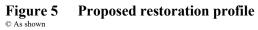


Figure 4 Currently approved restoration scheme for Thornhaugh

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1.2 SCOPE OF WORK UNDERTAKEN

Cultural heritage is represented by a wide range of features that result from past human use of the landscape. These include historic structures, many still in use, above ground and buried archaeological monuments and remains of all periods, artefacts of anthropological origin and evidence that can help reconstruct past human environments. In its broadest form cultural heritage is represented by the landscape and townscape itself.

As far as we can establish from historic maps and aerial photography all areas of the PDA where work will take place have previously been worked for mineral and there is no archaeological potential. This Heritage Statement therefore focuses upon the setting of designated heritage assets in relation to the proposed development. This approach has been agreed in the Scoping Opinion provided by Peterborough City Council.

Indirect effects can occur as a result of significant changes to the setting of a landscape or asset, whether permanent or temporary. This is particularly relevant to designated cultural heritage assets such as World Heritage Sites, Scheduled Monuments, Listed Buildings, Conservation Areas and Registered Parks and Gardens.

All work has been undertaken in accordance with *Standard and Guidance for Archaeological Desk-Based Assessment* (Chartered Institute for Archaeologists 2008, revised 2012).

The scope of work was as follows:

Box 1 Scope of Heritage Statement

- Description of the site and surrounding area
- Define significance and extent of the heritage assets
- Assessment of historic maps and photographs
- History of the development of the site
- Reference to relevant planning history
- Assessment of change and whether beneficial, adverse or neutral
- Recommendations for mitigation or design amendments to preserve setting of designated assets and avoid impacts on below ground archaeology
- Reference to all relevant policies and guidance, and discussion of how the proposed works (incorporating any mitigation) comply or conflict with the same

1.3 RELEVANT LEGISLATION, POLICY AND GUIDANCE

The importance of archaeology and cultural heritage is clearly recognised at both national and local levels. Certain features that are deemed to be of particular importance are given legal protection through the *Ancient Monuments and Archaeological Areas Act 1979* (Scheduled Monuments) and The Planning (Listed Buildings and Conservation Areas) Act 1990.

1.3.1 Policy and Guidance

The significance of any effects – both direct and indirect - should be identified as part of a cultural heritage assessment. This is achieved using a combination of the following published guidance and professional judgement.

• *National Planning Policy Framework* updated December 2023. Department for Communities and Local Government.

- Planning Practice Guidance (PPG) Conserving and Enhancing the Historic Environment updated 2019
- Historic England 2017 Good Practice Advice 3 The Setting of Heritage Assets, 2nd edition
- Historic England 2009. *Planning Mitigation and Archaeological Conservation Resource Assessment.*
- Historic England 2019. *Statements of Heritage Significance (HEAN12)*

1.3.2 National Planning Policy Framework

National planning policy on how cultural heritage should be assessed is given in the National Planning Policy Framework (NPPF), revised in December 2023. This covers all aspects of heritage and the historic environment, including listed buildings, conservation areas, registered parks and gardens, battlefields and archaeology.

Significance (for heritage policy) is described at Annex 2 of the NPPF 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.

Setting is defined within the NPPF 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. Elements of a setting may make a positive or negative contribution to the significance of the asset, may affect the ability to appreciate that significance or may be neutral.

The most relevant policies within NPPF to this proposal are reproduced below,

200. 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.

201. Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.

Considering potential impacts

205. 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.

206. Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:

a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;

b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.¹

207. Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

a) the nature of the heritage asset prevents all reasonable uses of the site; and

b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and

c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and

d) the harm or loss is outweighed by the benefit of bringing the site back into use.

208. 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.

209. 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.

210. Local planning authorities should not permit the loss of the whole or part of a heritage asset without taking all reasonable steps to ensure the new development will proceed after the loss has occurred.

211. Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.

1.3.3 Planning Practice Guidance (PPG) Conserving and Enhancing the Historic Environment

Planning Practice Guidance (PPG) Conserving and Enhancing the Historic Environment was published in April 2014 (updated in 2019) as a companion to the NPPF, replacing previous

¹ Non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets.

Circulars and other supplementary guidance. In respect of heritage decision-making, the PPG stresses the importance of determining applications on the basis of significance, and explains how the tests of harm and impact within the NPPF are to be interpreted.

In particular, the PPG includes the following in relation to the evaluation of significance and harm:

"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.

Whether a proposal causes substantial harm will be a judgment for the decision taker, having regard to the circumstances of the case and the policy in the National Planning Policy Framework. In general terms, substantial harm is a high test, so it may not arise in many cases. For example, in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset's significance rather than the scale of the development that is to be assessed. The harm may arise from works to the asset or from development within its setting.

What matters in assessing whether a proposal might cause harm is the impact on the significance of the heritage asset. As the National Planning Policy Framework makes clear, significance derives not only from a heritage asset's physical presence, but also from its setting.

Proposed development affecting a heritage asset may have no impact on its significance or may enhance its significance and therefore cause no harm to the heritage asset. Where potential harm to designated heritage assets is identified, it needs to be categorised as either less than substantial harm or substantial harm (which includes total loss) in order to identify which policies in the National Planning Policy Framework apply.

Within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated.

1.3.4 Historic England: The Setting of Heritage Assets (GPA3)

This Good Practice Advice Note published in 2017 observes that amongst the Government's planning objectives for the historic environment is that conservation decisions are based on the nature, extent and level of a heritage asset's significance and are investigated to a proportionate degree. Historic England recommends the following broad approach to assessment, undertaken as a series of steps that apply proportionately to complex or more straightforward cases:

- Step 1: identify which heritage assets and their settings are affected;
- Step 2: assess whether, how and to what degree these settings make a contribution to the significance of the heritage asset(s);
- Step 3: assess the effects of the proposed development, whether beneficial or harmful, on that significance;
- Step 4: explore the way to maximise enhancement and avoid or minimise harm;
- Step 5: make and document the decision and monitor outcomes.

1.3.5 Historic England: Statements of Heritage Significance (HEAN 12)

HEAN 12 notes that significance is one of the guiding principles running through the historic environment section of the NPPF. The NPPF defines significance as 'the value of a heritage asset to this and future generations because of its heritage interest'. Such interest may be 'archaeological, architectural, artistic or historic' and it may derive 'not only from a heritage asset's physical presence, but also from its setting'. Significance is what conservation sustains, and where appropriate enhances, in managing change to heritage assets.

HEAN 12 sets out three stages that should be followed to provide the planning authority with an understanding of significance of the heritage asset. That understanding:

- must describe significance following appropriate analysis, no matter what the level of significance or the scope of the proposal;
- should be sufficient, though no more, for an understanding of the impact of the proposal on the significance, both positive and negative; and
- sufficient for the LPA to come to a judgment about the level of impact on that significance and therefore on the merits of the proposal.

This approach is embedded into the following assessment.

1.3.5 Local Plans

The Peterborough City Council Local Plan was adopted in 2019. Policy LP19 is specifically relevant.

Policy LP19: The Historic Environment

The council recognises that the historic environment plays an important role in the quality of life experienced by local communities and will protect, conserve and seek opportunities to enhance Peterborough's rich and diverse heritage assets and their settings, for the enjoyment of current and future generations.

All new development must respect, and enhance or reinforce where appropriate, the local character and distinctiveness of the area in which it would be situated, particularly in areas of high heritage value. There will be particular emphasis on the following:

- a. a presumption against development that would unacceptably detract from important views of Peterborough Cathedral by virtue of its height, location, bulk or design;
- b. the use of Conservation Area Appraisals and associated Management Plans to ensure the preservation and where possible enhancement of the special character or appearance of each of Peterborough's Conservation Areas;
- c. the protection of designated heritage assets and their settings;
- d. the identification and protection of significant non-designated heritage assets and their settings; and
- e. the avoidance of harm to the character and setting of Burghley Park, Milton Park, Thorpe Park, and Peterborough Cathedral Precincts, and to the grounds and parkland associated with Bainton House, Ufford Hall, Walcot Hall and the Abbey Fields, Thorney.

All development proposals that would directly affect any heritage asset (whether designated or non-designated), including any contribution made by its setting, will need to be accompanied by a Heritage Statement which, as a minimum, should cover the following:

- f. describe and assess the significance of the asset and its setting to determine its architectural, historic, artistic or archaeological interest; and
- g. identify the impact of the development on the special character of the asset including the cumulative impact of incremental small-scale changes which may have as great an effect on the significance of a heritage asset as a larger scale development; and
- provide a clear justification for the works, especially if these would harm the significance of the asset or its setting, so that the harm can be mitigated and weighed against public benefits.

The level of detail required should be proportionate to the asset's importance and sufficient to understand the potential impact of the proposal on its significance and/or setting.

Unless it is explicitly demonstrated that the proposal meets the tests set out in the NPPF, planning permission will only be granted for development affecting a designated heritage asset where the impact of the proposal will not lead to substantial harm or loss of significance.

Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm will be weighed against the public benefits of the proposal, including securing its optimum viable use.

Where a non-designated heritage asset is affected by development proposals, there will be a presumption in favour of its retention, though regard will be had to the scale of any harm or loss and the significance of the heritage asset. Any special features which contribute to an asset's significance should be retained and reinstated, where possible.

The council recognises the significance of setting to a heritage asset and proposals that fail to proposals that make a positive contribution to, or better reveal the significance of, the heritage asset and its setting will, in principle, be supported.

Archaeology

In the case of application sites which include, or could potentially include, heritage assets with archaeological interest, designated or non-designated, the council will require the developer to carry out a preliminary desk-based assessment. If this does not provide sufficient information, developers will be required to undertake a programme of field evaluations.

The Cambridgeshire and Peterborough Minerals and Waste Local plan adopted in July 2021 and the relevant policy, number 21, is reproduced below

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POLICY 21: THE HISTORIC ENVIRONMENT

The Councils recognise the desirability of sustaining and enhancing the significance of heritage assets (and their setting); the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring; the desirability of new development making a positive contribution to local character and distinctiveness; and the opportunities to draw on the contribution made by the historic environment to the character of a place.

As such, all mineral and waste management proposals will be subject to the policy requirements set out in the NPPF, including striking an appropriate balance between harm and public benefit, but, as a first principle, development should avoid harm on the historic environment.

To assist decision makers, all development proposals that would directly affect any heritage asset and/or its setting (whether designated or non-designated), must be accompanied by a Heritage Statement which, as a minimum, should:

- (a) describe and assess the significance of the asset and/or its setting to determine its architectural, historic, artistic or archaeological interest;
- (b) identify the impact of the development on the special character of the asset (including any cumulative impacts); and
- (c) provide clear and convincing justification for any harm to, or loss of, the significance of a heritage asset (from its alteration or destruction, or from development within its setting).

The level of detail in the Heritage Statement should be proportionate to the asset's significance and sufficient to understand the potential impact of the proposal on its significance and/or setting.

Where appropriate, and particularly for minerals development proposals, the Heritage Statement must also consider:

- (d) the hydrological management of the site and the potential effects that variations in the water table or water flow patterns may have on known or potential archaeological remains. This assessment may be required to address an area beyond the planning application boundary; and
- (e) the potential for palaeolithic or later archaeology at depth, possibly making use of, where appropriate, a deposit model looking at the characteristics and distribution of deposits and natural landforms across the site and the likely potential for archaeology of all periods.

1.4 ASSESSMENT METHODOLOGY AND SIGNIFICANCE CRITERIA

In accordance with the EIA Regulations the significance of an effect should be identified as part of this assessment.

The prediction of effects and the assessment of their significance is based upon the published guidance cited above, measured using the criteria set out in the Design Manual for Roads and Bridges, 2020, LA104 *Environmental Assessment and Monitoring*, and informed by professional experience. These are considered the most transparent methods available for heritage assessments.

1.4.1 Type of Impact

Impacts may be beneficial, adverse, neutral (i.e. no discernible effect) or none. They may be permanent or temporary, of long, medium or short duration, direct or indirect. They may also be cumulative or combined with other effects occurring in the vicinity.

Direct impacts have a physical effect upon an archaeological site, structure or cultural heritage asset. This may lead to the partial or total destruction of that asset.

Indirect impacts of development upon scheduled monuments, listed buildings, parks and gardens and other designated assets of the cultural heritage landscape are more difficult to assess. Consideration should include the context (or setting) of a cultural heritage asset (or place) and how we should assess its significance. Contextual relationships may be visual, but can also be, for example, functional, historical or intellectual.

1.4.2 Likelihood of the impact occurring

An assessment is made as to the likelihood of the identified impact occurring. Probability is considered as certain, likely, unlikely or not known.

1.4.3 Sensitivity

Five categories of sensitivity are identified. These are expanded upon in Table 1, below.

Table 1Sensitivity of receptor

Value (Sensitivity) of receptor/resource	Definition
Very high	Sites and settings of <i>international importance</i> , for example World Heritage Sites.
High	Sites and settings of <i>national importance</i> . Scheduled Monuments. Registered Battlefields. Grade I and Grade II* Registered Historic Parks and Gardens. Sites may also be discovered as a result of new research that are also of national importance and are candidates for scheduling.

Moderate	Sites and settings of <i>regional importance</i> . Archaeological sites and features that are not considered sufficiently important or well- preserved to be protected as Scheduled Monuments. Grade II Registered Historic Parks and Gardens.
Low	Archaeological sites and structures, and other components of the historic environment that contribute to the local landscape.
Very Low	Archaeological sites and other components of the historic environment of very low importance.

1.4.4 Magnitude

The magnitude of change to an archaeological asset or landscape is considered in terms of its vulnerability, its current condition, and the nature of the impact upon it. Magnitude is assessed as major, moderate, minor, negligible or none and the criteria used in this assessment are set out in **Table 2**, below.

Table 2Magnitude of Change

Magnitude of Impact	: (change)	Typical Description				
Major	Adverse	Loss of resource and/or quality and integrity of resource; severe damage to key characteristics, features or elements.				
	Beneficial	Large scale or major improvement of resource quality; extensive restoration; major improvement of attribute quality.				
Moderate	Adverse	Loss of resource, but not adversely affecting the integrity; partial loss of/damage to key characteristics, features or elements.				
	Beneficial	Benefit to, or addition of, key characteristics, features or elements; improvement of attribute quality.				
Minor	Adverse	Some measurable change in attributes, quality or vulnerability; minor loss of, or alteration to, one (maybe more) key characteristics, features or elements				
	Beneficial	Minor benefit to, or addition of, one (maybe more) key characteristics, features or elements; some beneficial impact on attribute or a reduced risk of negative impact occurring.				
Negligible/ Neutral	Adverse	Very minor loss or detrimental alteration to one or more characteristics, features or elements.				
	Beneficial	Very minor benefit to or positive addition of one or more characteristics, features or elements.				

1.4.5 Assessing significance

The criteria are considered together to reach a conclusion upon the significance of residual effects taking into account any mitigation measures. They may be beneficial or adverse or

neutral effects (i.e. no change to the existing situation). In some cases, it may not be possible to quantify the significance of an effect, for example due to a gap in information, and this is noted.

Table 3 presents a matrix of the inter-relationship of environmental value (sensitivity) with magnitude that leads to a conclusion on the significance of an effect.

			В	aseline Sensitiv	ity	
		Very High	High	Moderate	Low	Very Low
	Major Beneficial	Major Beneficial	Major- Moderate Beneficial	Moderate Beneficial	Moderate/Minor Beneficial	Minor Beneficial
	Moderate Beneficial	Major- Moderate Beneficial	Moderate Beneficial	Moderate/Minor Beneficial	Minor Beneficial	Minor/Negligible Beneficial
	Minor Beneficial	Moderate Beneficial	Moderate/Minor Beneficial	Minor Beneficial	Minor/Negligible Beneficial	Negligible
	Neutral	Negligible	Negligible	Negligible	Negligible	Negligible
Change	Minor Adverse	Moderate Adverse	Moderate/Minor Adverse	Minor Adverse	Minor/Negligible Adverse	Negligible
of	Moderate Adverse	Major- Moderate Adverse	Moderate Adverse	Moderate/Minor Adverse	Minor Adverse	Minor/Negligible Adverse
Magnitude	Major Adverse	Major Adverse	Major- Moderate Adverse	Moderate Adverse	Moderate/Minor Adverse	Minor Adverse

Table 3Matrix of Significance

1.4.6 Limitations and Assumptions

The surveys and baseline information were based on a snapshot in time and the information, including that obtained through secondary sources, is assumed correct at that time.

1.5 AUTHORSHIP

This assessment has been written by Andrew Josephs and Paul Stamper.

<u>Andrew Josephs</u> (BA Hons Archaeology and Environmental Studies, 1985) has extensive experience of all periods and facets of cultural heritage, including the authorship of over 1000 Heritage Statements, many under the EIA Regulations. He was previously Principal Consultant (Director of Heritage and Archaeology) at Entec (now Wood) and Wardell Armstrong, where he started in 1992, becoming of the UK's first consultants in the post-PPG16 era of developer-funded archaeology. Prior to 1992, he worked as a field-based archaeologist and researcher for universities and units in the UK, Europe and the USA. He lectures widely on heritage and was previously visiting lecturer in Environmental Impact Assessment at the University of Nottingham. He is an experienced expert witness.

<u>Dr Paul Stamper</u> FSA is a specialist in the English landscape and its buildings. After a 35-year career with first the Victoria County History and then Historic England, where he was a senior adviser in the Listing Department, he joined AJA in 2016. Most of his work involves recording and assessing the significance of historic buildings and landscapes, and the likely impact of

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proposed changes. The scale ranges from local barn conversions to multi-million pound development schemes, including expert witness work at Public Inquiries.

Paul has deep-rooted experience of buildings of all types and periods, and was responsible for Historic England's 20 listing selection guides setting out understanding, criteria and standards for all types of structures. He is a Fellow of the Society of Antiquaries, a past Vice-President of the Royal Archaeological Institute and of the Society for Medieval Archaeology, and is a past President of the Medieval Settlement Research Group.

2. Baseline

2.1 DESIGNATED HERITAGE ASSETS

The Historic England Archive (Listing the List) and Defra's Magic map were consulted to verify the location of designated heritage assets.

An initial assessment study area of 500m from the proposed development area was considered an appropriate distance to assess the potential effects upon the setting of designated heritage assets given the scale of current operations (the current baseline), the screening effects of trees, topography and the severance of the landscape caused by the A47.

There are no scheduled monuments within the study area, the nearest being Wansford Bridge 1.8km south east. The nearest Grade I listed building is the Church of St. Mary the Virgin in Wansford, 1.7km south east. There is no intervisibility with the PDA.

2.2 LISTED BUILDINGS

The following individual assets, summarised in **Table 4** and shown on **Figure 6**, were scoped into the initial assessment:

Ref on Fig. 5	Asset	Grade	National Heritage List reference	Distance from PDA boundary
1	Cooks Hole Farmhouse . A farmhouse, dated C17 and C18 extended with minor alterations in the C19. Built from local limestone with Collyweston slate roofs, with a brick stack to the east gable end.	II	1393708	Within
2	Home Farm Group			
	Home Farm House. House formerly a farmhouse. Mid C18 with C19 alterations and additions c.1911. Coursed limestone with ashlar and moulded stone dressings. Collyweston stone slated roofs hipped to west and south. The farmhouse was rebuilt by the Duke of Bedford on the site of the	11	1127461	90m
	former hunting lodge of the 1st Lord Russell Baron of Thornhaugh, hence it is also known as Bedford Lodge.		1127414	120m
	Stable range and granary. C18 with C19 additions. Coursed squared limestone rubble with ashlar dressings. Collyweston stone slated roofs.		1127415	135m
	Barn and Dairy Ranges. Now a dwelling. C18 and late C19. Coursed squared limestone rubble with ashlar dressings. Collyweston stone slated roofs.			
3	Sibberton Lodge Group			
	Sibberton Lodge. C17 house with a medieval wing possibly a chapel. The C17 part has datestone 1657, coursed stone with	11*	1331255	525m

Table 4 Heritage Assets Scoped into Initial Assessment

Ref on Fig. 5	Asset	Grade	National Heritage List reference	Distance from PDA boundary
	steeply pitched Collyweston stone roof with coped gable ends, 2 storey, 4 window range.			
	Stables to west of Sibberton Lodge . Early C19 stable range. Coursed stone with Collyweston stone roof with gabled ends. One storey and attic.	II	1331256	500m
	Barn to south of Sibberton Lodge. Large C17/18 barn. Coursed stone. Steeply pitched roof with coping to end gables, modern slates.	II	1127463	520m
	Barn to south east of Sibberton Lodge. C17/18 barn. Coursed stone with steeply pitched modern slate roof with coped end gables.	11	1266207	540m
	Sibberton Lodge Cottage. C18 stables converted to cottage. Coursed stone with steeply pitched pyramidal roof of Collyweston stones.	11	1127462	540m

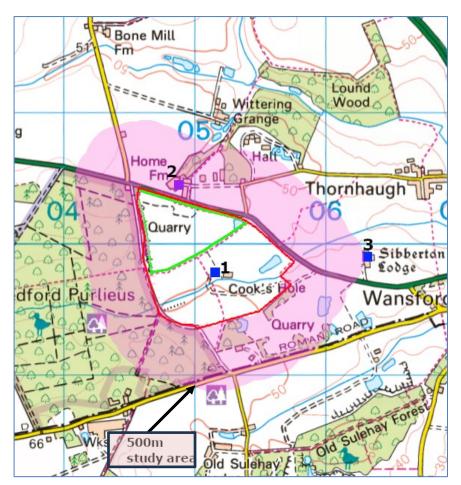


Figure 6 Designated Heritage Assets within 500m of PDA boundary © Crown copyright. All rights reserved. Licence number 100043831

2.3 COOKS HOLE FARMHOUSE

2.3.1 Overview

A site visit was made by Dr Paul Stamper on 11 August 2023.

Cooks Hole is a Grade II-listed stone farmhouse of 17^{th} -century and later date. The List entry (**Appendix A**) states that its rarity value is that '*It is a rare example of a substantially unmodernised house of this date*' and suggesting therein that '*this date*' is the late 17^{th} /early 18^{th} house. Detailed assessment, where health and safety allowed, indicates that the listing significantly underplays the extent of 19^{th} century alterations. This is likely because the alterations were done to a high standard and very much in keeping with the building traditions of its origins. We do not agree with the listing description that there are '*minor alterations in the C19*'.

2.3.2 Setting

The farmstead complex, as is name suggests, is well set down in a stream valley alongside a spring. This rises still, and water runs between the farmhouse and a lavatory block described below. A retaining wall runs along the north side of the farmhouse, and from the land to the north there is a c.1.5m drop down to the level the farmhouse stands on.

From the north looking south across land worked and restored in the mid/late 20th century, the upper part of the farmhouse – one gable and the roof - is visible. The ground floor lies below the line of the retaining wall (**Figure 7**) and the height of the house is visually truncated. The whole farmstead is absorbed into its woodland setting.



Figure 7 View south towards Cooks Hole farmstead (ringed). The ground levels in the immediate vicinity of the farmstead with the exception of the removal of the bund will remain unchanged. The ground levels will gradually increase towards the north (50mm lens).



Figure 8 The farmstead from the south looking north, set down in the stream valley. A temporary stockpile of clay in Cooks Hole is glimpsed in the centre distance. The approximate proposed restoration ground level at this point is shown with a red line

2.3.3 The Buildings

Superficially the house is in a poor condition, with limited sections of the roof (notably in the centre of the house) collapsing. However, in general all parts of the structure are well-built and remain in good condition. No evidence of structural problems (e.g. subsidence) was observed.

An interior inspection was not possible.



Figure 9 The house from the north looking south: its front elevation



Figure 10 The house from the north-west looking south east. The retaining wall runs across the picture; behind it the ground drops c.1.5m.



Figure 11 The house from the north-east, looking south west. Note the retaining wall



Figure 12 Centre of rear elevation from the south looking north



Figure 13 Rear elevation from the south-west, looking north east

2.3.4 Curtilage Buildings

Well behind the house is a substantial, mid-late 19th-century, lavatory block, with three separate compartments. This is in good condition.



Figure 14 The lavatory block

The Cooks Hole farm buildings stand well to the east of the farmhouse, in the same stream valley. On the north side of a small yard is a stone barn, perhaps 18th century but reroofed in the 19th or early 20th century. The barn is in good condition. To the east is a low-quality brick mid-20th-century milking parlour. This is in poor condition.



Figure 15 Farm buildings from the south west looking north east



Figure 16 The barn interior, east end. The barn is probably 18thcentury, but with later reroofing. It has opposed doors in the long walls, and five generous ventilation slits (now blocked) in each gable.

2.4 HISTORIC MAPPING

The tithe map of 1839 records the following details for Cooks Hole

Landowner His Grace Francis Bedford Duke of Bedford

Occupier	Alice Percival
----------	----------------

Parish Thornhaugh and Wansford

Date 15th February 1839

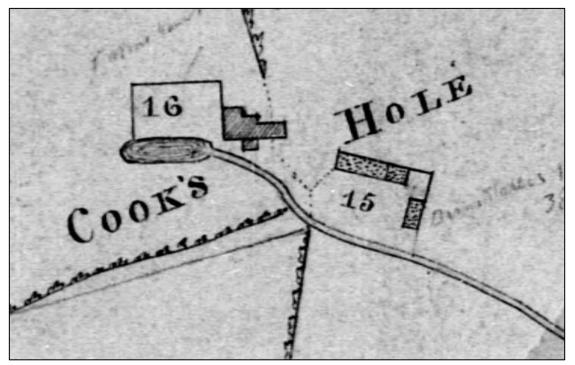


Figure 17 Tithe Map, 1839. Note pond to the west of the house

ercival, Alice	10 Heath Close	24	0	28	2	6	6	A
	12 Little Slade	1	1	1.3	1	16		AORE
	13 Heath Close	31	3	a	6	1.3		A
	14 Heath Close	18	3	36	3	13		A
	15 Barns Stables Yords te			38	t	/	6	R.
	Garden Yards te 5	4	1	24		2	3	A
	17 a Close West of the House	10	2	21	3			R
	18 a Close West of the last	21	2	24	. 2	2	6	À
	16 Ozier Holt	÷.		6	1			
	168 03 ier Holl	1.1		11	199			
	16g Ozier Holl	:/	2	19	2			A
	171 Swelve ano Close	5	2	21	1	14	0	A
	183 Butt Close	10	1	33	13	3	. 1	AOA3 .
		103	20	30	135	13		

Figure 18 Tithe Apportionment, 1839

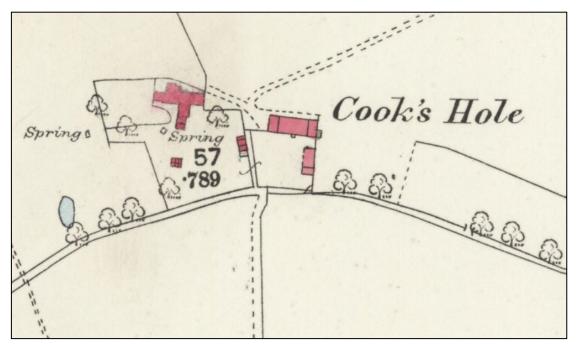


Figure 19 Ordnance Survey 25-inch mapping c.1880. To the left the farmhouse, with the lavatory block to the south. The outbuilding is to the east. The small farmyard lies on the right-hand side (east), with the barn on its north side and the predecessor to the milking parlour on the east side of the yard.

The 1880 map shows clearly that the farmhouse has been altered and extended since the tithe map of 1839. A comparison of the layout is shown on **Figure 20**. This bears out our conclusion, that whilst there are elements of $17^{\text{th}}/\text{early } 18^{\text{th}}$ house, the house is certainly not a '*a rare example of a substantially unmodernised house of this date*'.

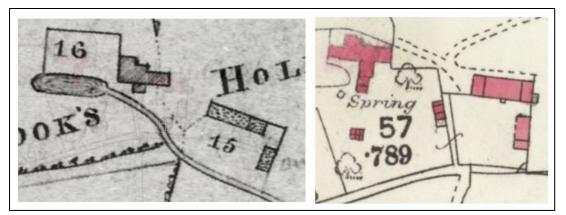


Figure 20 A comparison of the 1839 Tithe Map and Ordnance Survey c.1880. Despite issues with orientation of the buildings (or otherwise the farmbuildings have been rebuilt), the house can be seen to have been extended west and south since 1839

2.5 HISTORIC MINERAL EXTRACTION

Historic mapping indicates that ironstone quarrying has been undertaken in the local landscape since soon after World War II. A map (**Figure 21**) of circa 1948 shows the extent of working around Cooks Hole. The company running the quarry was Richard Thomas and Baldwins Ltd (RTB) a major iron, steel and tinplate producer, formed in 1948 by the merger of Richard Thomas & Co Ltd with Baldwins Ltd. It was nationalised in 1951 under the Iron and Steel Corporation of Great Britain and later became part of the British Steel Corporation in 1967.

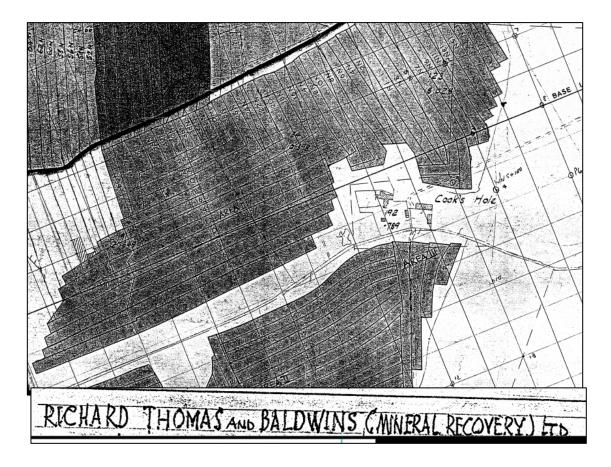


Figure 21 Extract of undated map showing extent of workings, shaded black, around Cooks Hole

An aerial photograph (Figure 22) of 1952 shows workings around Cooks Hole.



Figure 22 Aerial photograph of 1952 shows workings around Cooks Hole (circled). The red line refers to a previous ROMP submission

A recent map, summarises the information gathered from historic mapping, aerial photography and geophysical survey (**Figure 23**). Also, as can be seen from **Figure 24**, the land that had not been worked to the north east and south east of Cooks Hole Farmhouse has been quarried in the past few years. This provides conclusive proof that the land around Cooks Hole Farmhouse is within a landscape that has been entirely worked and restored.

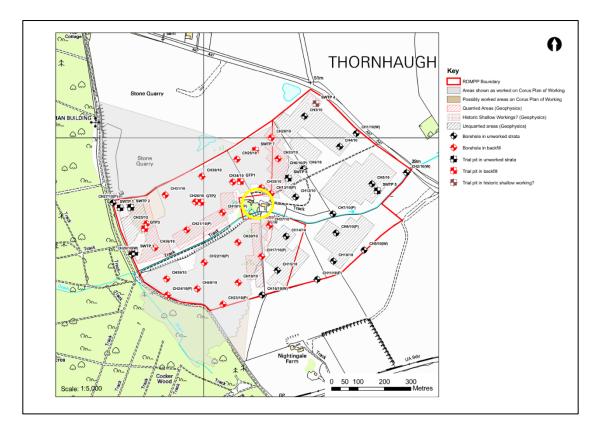


Figure 23 Summary map showing worked and restored land to the north and south of Cooks Hole Farmhouse (circled)



Figure 24 Google Earth image (2018) showing working to NE and SE of Cooks Hole Farmhouse (circled) ©Google Earth Base Photo

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3. Assessment of The Setting of the Designated Assets

3.1 INTRODUCTION

The impact of a development can be either direct, or indirect. Indirect impacts are those that do not physically affect a cultural heritage asset, townscape or landscape, but that alter the context or setting. Setting is defined through law, policy and good practice guidance.

Law: The Planning (Listed Buildings and Conservation Areas) Act 1990 requires that when considering any planning application that affects a listed building a local planning authority must pay special attention to the desirability of preserving or enhancing the character or appearance of that asset and its setting.

Policy: is set out in the National Planning Policy Framework. Paragraph 194 requires applicants to describe the significance of any heritage assets likely to be affected by development proposals. The paragraph states that the level of detail should be proportionate to an asset's importance and no more than is sufficient to understand the potential impact of the proposal.

Significance (for heritage policy) is described at Annex 2 of the National Planning Policy Framework 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.

Setting is defined within the NPPF 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. Elements of a setting may make a positive or negative contribution to the significance of the asset, may affect the ability to appreciate that significance or may be neutral.

Good practice: The essential good practice guide for assessment is provided by Historic England's *Historic Environment Good Practice Advice* in *Planning Note 3: The Setting of Heritage Assets* (2nd Edition, December 2017). That gives general advice on understanding setting, and how it may contribute to the significance of heritage assets and allow that significance to be appreciated, as well as advice on how views contribute to setting.

The 5-step approach recommended by GPA3, (see section 1.3.4, above), has been followed below. As set out in HEAN 12 (section 1.3.5, above) the aim of the assessment is provide sufficient information 'for the LPA to come to a judgment about the level of impact on that significance and therefore on the merits of the proposal.'

3.2 STEP 1: IDENTIFY WHICH HERITAGE ASSETS AND THEIR SETTINGS ARE AFFECTED

3.2.1 Introduction

A site visit was carried out in August 2023. Google Earth and Streetview were also used as tools for understanding the influences of topography, screening and development on assets in the wider landscape.

The only asset that could be affected by the proposed revised restoration is Cooks Hole Farmhouse, Grade II listed. This is addressed in **Section 3.3**. Home Farm Group and Sibberton Lodge are scoped out for the reasons set out below (**Sections 3.2.2 and 3.2.3**).

3.2.2 Home Farm Group

The Home Farm Group of Grade II buildings, including the farmhouse that was rebuilt by the Duke of Bedford on the site of the former hunting lodge, sits 90m-125m north of the PDA, enclosed by trees and to the north of the A47. To the south of the A47 a mature and dense treescreening belt prevents all views of Thornhaugh. The land nearest the A47 has been restored and this profile will not change as a result of the proposed revised restoration. There will be no effect upon setting from the current proposals.



Figure 25 Current setting of Home Farm group ©Google Earth Base Photo



Figure 26 View towards Home Farm group from A47, well enclosed by mature trees and hedging ©Google Streetview



Figure 27 View towards PDA (Thornhaugh) from outside the entrance to Home Farm group on A47, showing mature tree screening ©Google Streetview

3.2.3 Sibberton Lodge Group

The Sibberton Lodge Group of Grade II* lodge and Grade II farm buildings sits over 500m east of the PDA. The group is enclosed by mature trees and is on the northern side of the A47, as illustrated on **Figures 28 and 29**. The restoration will not be visible from the group, and any historical context has long since been removed by quarrying at Thornhaugh II (now a 'brownfield biodiversity site'). There will be no effect upon setting from the current proposals.



Figure 28 Current setting of Sibberton Lodge group ©Google Earth Base Photo



Figure 29 View towards Sibberton Lodge group from A47, fully enclosed by mature trees and hedging ©Google Streetview

3.3 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

The findings of Step 1, above, show that there would be no impact upon the setting of listed buildings outside the PDA boundary. The focus of the following assessment is therefore upon the Cooks Hole Farmhouse which is within the proposed development.

It is clear that, whilst the proposed development will be clearly visible from Cooks Hole Farmhouse during the restoration works, that is a continuation of permitted development and restoration which has included mineral extraction as close as can be seen on **Figure 23**, above.

The revised proposals will result in an increase in height of topography in Cooks Hole from that approved by up to a maximum of 14m at the boundary with Thornhaugh. The highest restoration level on Thornhaugh of 71.5mAOD remains unchanged as a result of the proposed development. As can be seen on cross-section (**Figure 30**), there is no change of ground levels proposed within the immediate vicinity of Cooks Hole Farmhouse. After completion of all restoration, the ground profile will be one of a natural looking landscape comprising grassland, woodland, hedgerows, scrub and shrub.

The view to Home Farm House from Cooks Hole Farmhouse is not affected by the proposals as the consented Thornhaugh restoration scheme already creates a highpoint at 71.5mAOD that would obscure any visual connection.

What is of relevance to the assessment of setting and views is that after revised restoration the higher ground to the north of Cooks Hole, where the reinstated public footpath no 3 will run approximately 200m north of the house, will be more elevated by approximately 14m at the highest point than in the currently approved scheme. This will have no impact upon the setting of the house, but will increase appreciation of views to the house that is currently barely visible due to it lowered setting in the landscape.

The house itself is set down, as discussed above, and within mature trees. Views out are extremely limited and, indeed, there is no appreciation of the wider landscape as a result of this. This is illustrated on **Figure 31**.

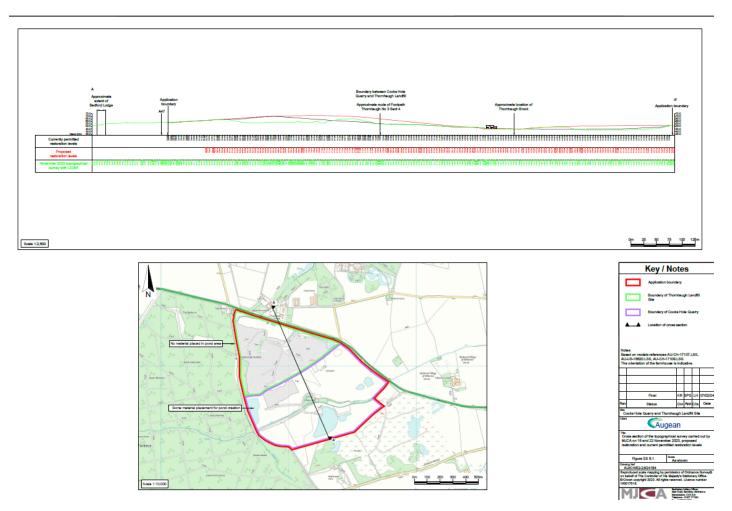


Figure 30 Cross-section through the revised restoration profile and Cooks Hole Farmhouse

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Figure 31 View looking north over Cooks Hole showing how the house sits down on the landscape

3.4 STEP 3: ASSESS THE EFFECTS OF THE PROPOSED DEVELOPMENT, WHETHER BENEFICIAL OR HARMFUL, ON THE SIGNIFICANCE OR ON THE ABILITY TO APPRECIATE IT

The key factor is to determine the effects upon significance and how that can affect our ability to appreciate the asset, the test set in Historic England guidance. Effects may be visual or contextual (such as historical), and the current setting is important.

As established above, the only asset affected by the revised restoration proposals is Cooks Hole Farmhouse, Grade II. Whilst the restoration works will be visible from the house, the house itself has been surrounded by mineral workings since at least 1948. The current situation and the currently approved restoration are the baseline, against which the revised proposals must be assessed. The only change would be a raising of the land north and south of the House in comparison to the currently approved scheme, albeit that the land in the immediate vicinity of the house will be unchanged. Careful consideration has been given to the restoration profile so that the final landform will appear as a natural part of the landscape and will blend in with the approved landform in Thornhaugh.

During the restoration phase it is assessed that there will be an adverse effect of minor magnitude upon views from the House, but no affect upon our ability to appreciate the significance of the heritage asset. Appreciation comes in different forms, but the fact that the House is not occupied, nor can be appreciated by the public due it sitting within a working quarry, contributes to appreciation.

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After restoration there would be no residual adverse effects and no change to the significance of the setting, nor our ability to appreciate that significance. It is considered highly unlikely that after restoration, a visitor would be able to recognise that the original setting of the House has changed, not least that the whole landscape surrounding the House would have been worked and restored over a period of 100 years.

Public access to footpaths would be reinstated, with links through the countryside restored, such as south from Home Farm (the site of Bedford Lodge) and west from Sibberton Lodge, to Cooks Hole Farmhouse and beyond to Bedford Purlieus. New permissive footpaths to the south of Thornhaugh Brook will allow additional appreciation of Cooks Hole farmstead.

3.5 STEP 4: EXPLORE WAYS TO MAXIMISE ENHANCEMENT AND AVOID OR MINIMISE HARM

Cooks Hole Farmhouse will be made watertight and secure to help prevent vandalism. The building will be maintained in this state for the duration of the operations. The works will be agreed with Peterborough City Council.

The setting of the farmhouse will be enhanced by the removal of self-set trees such as elder and the ground vegetation to open up the land immediately around the house and reduce damp.

3.6 STEP 5: MAKE AND DOCUMENT THE DECISION AND MONITOR OUTCOMES

The residual effects of the revised restoration proposals are documented below, Table 5.

	Type of Effect	Probability of Effect Occurring	Sensitivity	Magnitude of change caused by the proposed development	Significance of change (effect) caused by the proposed development	Rationale
Adverse direct effects upon statutorily designated assets of the historic environment	None	Certain	High/Medium	No change	Neutral	There will be no direct adverse effects upon statutorily designated assets.
Indirect effects upon setting of listed buildings: Cooks Hole. <u>During restoration</u> <u>After restoration</u>	Negative Neutral	Certain Certain	Medium Medium	Minor Neutral	Slight Neutral	The restoration will be visible from the House (which is unoccupied), but this should be measured against a baseline of mineral working and restoration that has encircled the House since about 1948. There will be no effect upon our appreciation of the significance of the asset. There will be no adverse effects upon the setting of listed building due to the natural appearance of the restored landform and its integration into the landscape.
Indirect effects upon other designated heritage assets during and after restoration	Neutral	Certain	Medium	None	Neutral	Assets in the local landscape are screened from the PDA by woodland surrounding the assets, by tree screening around the PDA. There is no intervisibility and there would no effect upon their setting introduced by the revised restoration proposals. Footpaths will be reinstated restoring historic linkages.

Table 5Effects and Evaluation of Significance

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4. Conclusion

The potential effects upon heritage have been assessed within the framework of national planning policy and guidance.

Specifically, this assessment has been undertaken in line with paragraph 194 of NPPF (2023):

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....

The PDA has been previously subjected to mineral extraction. There will be no effects upon archaeology.

There will be no adverse effects upon the setting of offsite listed buildings or scheduled monuments due to intervening development, vegetation and topography.

One asset lies within the PDA - Cooks Hole Grade II listed Farm House. The House was altered and extended in the 19th century and whilst this does not alter the fact that it is listed, it does question the listing description that described it as a '*a rare example of a substantially unmodernised house of this date* [17th/early 18th century].

The key factor in an assessment is to determine the effects upon significance and how that can affect our ability to appreciate the asset, the test set in Historic England guidance. Whilst the restoration works will be visible from the house, the house itself is, and will remain unoccupied, and has been surrounded by mineral workings since at least 1948. The current situation and the currently approved restoration are the baseline, against which the revised proposals must be assessed. The only change would be a raising of the land north and south of the House in comparison to the approved scheme, albeit that the land nearest to the House – which has been historically restored - will be unchanged. Careful consideration has been given to the restoration profile so that the final landform will appear as a natural part of the landscape and will blend in with the approved landform in Thornhaugh.

The EIA concluded that there will be an adverse effect of minor magnitude upon views from the House during the restoration phase, but no affect upon our ability to appreciate the significance of the heritage asset. In NPPF terms, this effect falls at the lowest end of the 'less than substantial harm' scale.

After restoration there would be no residual adverse effects and no change to the significance of the setting, nor our ability to appreciate that that significance. Public access to footpaths would be reinstated, restoring historic linkages. The assessment concluded that after restoration, a visitor would not be able to recognise that the original setting of the House has changed, not least that the whole landscape surrounding the House would have been worked and restored over a period of 100 years.

Section 16(2) Planning (Listed Buildings and Conservation Areas) Act 1990 states that Local Planning Authorities shall have special regard to the desirability of preserving or enhancing assets and their setting. Careful consideration has been given to the restoration profile so that the final landform will appear as a natural part of the landscape. After restoration there would be no residual adverse effects and no change to the significance of the setting.

Following restoration, the proposed development therefore accords with national policies relating to cultural heritage.

Appendix A

Cooks Hole Farmhouse List Entry

Location

Statutory Address: COOKS HOLE FARMHOUSE, LEICESTER ROAD

The building or site itself may lie within the boundary of more than one authority.

District:

City of Peterborough (Unitary Authority)

Parish:

Thornhaugh National Grid Reference: TL 05179 99755

Details

THORNHAUGH

987/0/10040 LEICESTER ROAD 09-MAR-10 COOKS HOLE FARMHOUSE

II A farmhouse, dated C17 and C18 extended with minor alterations in the C19. Built from local limestone with Collyweston slate roofs, with a brick stack to the east gable end.

PLAN: Cooks Hole Farmhouse consists of a long rectangular range with wings to the north and south, that to the north is at the west end of the range, that to the south is to the centre; this wing has single-storey outhouses attached to the south gable end, and in the angle between the north wing and main range is a small single-storey lean-to with a catslide roof. The main range has a large central stack and chimneys at either end, and there is another above the south wing gable; the chimney stack to the east is external and built of brick. There is also a small chimney in the angle between the north wing and C19 addition.

EXTERIOR: The walls are mainly of coursed limestone rubble with ashlar dressings, and the roofs are covered in Collyweston slate. The house is of one-and-a-half-storeys, and the roofline of north and south wings is slightly lower than that of the main range. The dip and wobble of the rooflines suggest that the roofs have no ridge pieces, and that the roof trusses probably retain much of their original material. The slightly lower Collyweston slate roof of the C19 addition, attached to the west gable end, is the exception. The wall construction of this extension is also more regular, of dressed limestone. Its south elevation has one casement window to ground and first-floors respectively, and an entrance set against the gable end of the earlier house. This now seems to be the main entrance to the house, but there is a blocked entrance in the east end of the south elevation, and vestigial evidence of entrances in the south wing. The main range has tile hung dormer windows in the south slope of the roof, while the south wing has a single similar window to either side. Ground-floor windows are casements under wooden lintels.

HISTORY: Cooks Hole is a remote farm south-west of Thornhaugh village, and seems to have been the only isolated farmstead in the parish at the time of the 1838 Tythe map. The farmhouse appears to be an C18 building with an earlier, possibly C17 core, and with a small C19 addition at its west end. This extension is not shown on the Bedford Estate map of 1838, which otherwise shows the house to have the same plan as it does today (including the outbuildings to the south wing), but it had been built by 1871.

Assuming that the house was originally built as a single dwelling, perhaps as a single or double cell house later enlarged by the addition of north and south wings, its fortune seems to have changed in the course of the C19. The 1900 OS map indicates three dwellings, a decline from single to multiple occupancy which is confirmed by an increase in the number of chimney stacks and entrances: the east end of the house has a brick stack attached to the gable end and a blocked door in the south elevation, the C19 extension has a stack and separate entrance, and the entrance to the central section may have been through a blocked door in the angle between the north wing and the C19 addition, serving a corner fireplace in the north wing which was previously unheated.

SOURCES: Bedford Estate Maps, 1838 and 1871. Copies held in Peterborough City Library. Thornhaugh Tythe map, 1838. Copy held in Peterborough City Library.

REASON FOR DESIGNATION: Cooks Hole Farmhouse, an C18 or earlier house, is designated at Grade II for the following principal reasons: * Architecture: It is of special interest as a vernacular house constructed of local materials in accordance with local custom and tradition. * Intactness: Its external fabric survives substantially intact. * History: It is of special historical interest for its date, and for the surviving evidence of change and alteration over time. It also forms a significant component of the historic rural landscape. * Rarity: It is a rare example of a substantially unmodernised house of this date.



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