

**Welwyn Hatfield Borough Council: Draft Local Plan Consultation Examination
in Public: Joint Hearing Session - Birchall Garden Suburb**

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Comments for Matter 7 – Historic heritage and urban design

Heritage Assets

The setting of a heritage asset is how it is experienced, not just visually but also light pollution from nearby settlements, traffic noise and air pollution &c. The proposed development will have an adverse effect on the setting of other heritage assets such as Marden park and those along the Mimram valley, as well as those at Essendon, and the major parks at Hatfield and Panshanger.

The Second Road Investment Strategy from Highways England which has been out for consultation, has also raised concerns about the impact of the road network on heritage assets. *The setting of heritage assets from Grade I listed stately homes to undesignated cottages can also be detrimentally affected by the SRN. 51 per cent of the schemes examined in the recent CPRE research affected an area with a national or local landscape designation or with a heritage designation.* (Campaign to Protect Rural England & Transport for Quality of Life, *The Impact of Road Projects in England* (2017) cited in *Rising to the challenge A shared green vision for RIS2* from Campaign for Better Transport). Not only the built development but the increased traffic on the A414 from this and other developments will harm the settings of the heritage assets. This harm will include noise (we note that the resurfacing of the A414 recently has increased the noise levels at Panshanger), and further highway lighting columns along the A414 would be visually intrusive even during the day with the string of lights connecting Panshanger and Hatfield in an unacceptably urban fashion

33) Is there an evidence base that has assessed the sensitivity of development to the nearby Heritage assets, including montages of the views affected (as recommended by the Heritage Impact Assessment produced by the Councils by Beacon Planning?)

We have read the Beacon Report and are disappointed that it does not include information which we consider would be useful, e.g. the recent research on Panshanger undertaken by HGT in advance of the 2018 Repton Bicentenary celebrations or the archaeological finds across the interfluvium made by local amateur archaeologists; nor give those assets which are included the consideration they merit from a cumulative point of view as the most concentrated grouping of interconnected historic designed landscapes in the country and the evidence of widespread early occupation.

We therefore consider the evidence base to be incomplete and the HIA not based on the full evidence and so flawed.

We are disappointed that none of the photomontages in the submission are of the type and quality advised by the new *Setting of Heritage Assets* (HEGPA Planning Note 3 2nd Edition) and do not take in all the historic views which would be affected.

34) If so, has the allocation had full regard to this evidence?

No.

Full evidence is not included in the Beacon Report (as above) and this report was produced **after** the site was allocated so could not have regard to evidence which was not available at the time.

35) Would development in the south-eastern part of the site, in proximity to the A414, be visible from Hatfield House and its Historic Park and from the Essendon Heritage assets? Would development in the north western and eastern part of the site be visible from Panshanger Park.

Yes to both questions.

35.1 Hatfield and Essendon

Views from the house roof would include sight of any development here. These were the key views during the 17th century when this house was built, as with all major Tudor/Stuart houses. Key views across the river Lea from Essendon, towards the developments would not be screened by the proposed bund, as the development is on rising ground and light pollution would also harm the settings of the Essendon heritage assets. Other heritage assets further afield, such as the observation tower at Little Berkhamstead known as Stratton's Folly, also command views of the proposed development area

35.2 Panshanger

The Cole Green landscape is currently being restored and historic elements from the Capability Brown layout (and the earlier avenues) will be conserved and re-instated where possible. This will be open to the public and a heritage committee has been appointed to oversee these heritage asset works. Part of the proposed BGS development will be on Brown's former shrubbery/menagerie, now west of Panshanger Lane. This will compromise the historic views from the Registered parkland, and cause noise and light pollution to this important park which has recently been featured in *Vulnerability Brown* published by The Gardens Trust.

We are unclear what the 'Heritage Asset Buffer Zone' is and how it could screen Panshanger from the development unless it was of a sufficient density of mature trees. We note that this is a valuable arable area for wildlife but is also the proposed site for schools. However, such a screen of mature trees would destroy the setting of the park and its relationship with Hatfield Park and other heritage assets.

36) If so, would the development be harmful to the settings of the heritage assets?

Yes

36.1 Hatfield House

Hatfield is a more self-contained park as is usual with Tudor and earlier parks but part of its significance (and its Registering at Grade I) lies with the contrast between the designed parkland and the more mundane rural environs to the east, south and northeast. Some of its rural hinterland has been eroded over time with the establishment of Hatfield new town and the incremental growth of Welwyn Garden City, only held in check by the Salisbury Line. Thus at present Welwyn Garden City is not visible from Hatfield along the A414 but the proposed development would be. This renders the rural hinterland more important, especially as some of it is part of the wider estate and as such has historic linkages to it.

36.2 Panshanger

Cole Green House (Panshanger) was sited between the county town and Hatfield House, the most important estate in this part of Hertfordshire, but with visual links to other important local estates. Earl Cowper (soon to be Lord Chancellor) positioned his new house on the top of the hill looking across as an equal to Hatfield House on its hill but looking down on lesser parks.

Views from Cole Green were designed to include the land outside of the park, including the continuance of an avenue (1704 but still partly extant) towards Holywell and Essendon, framing the view. Many of these views towards Essendon and Brookmans Park beyond, Hatfield, Marden &c still exist with the woods of Hatfield being the most dominant and important object in view.

It is unfortunate that the setting of Panshanger Park cannot be considered in its entirety at these Hearings. We have raised the issue of HERT3 allocation in East Herts DC which will harm the setting and therefore the significance of Panshanger Park on the north-eastern side. The cumulative effect of the pincer-like development on both sides on the setting and significance of the park merits consideration.

36.3 Hatfield and Panshanger Parks

The Key Views/Vistas and the Setting of both Panshanger and Hatfield parks are encapsulated in their relationship to each other which contributes substantially to the significance of Panshanger and emphasizes both parks as 'different' and 'significant' in contrast to their surroundings.

Both major parks have important design elements including avenues reaching out across the landscape and were designed to be – and still are - counterpointed by the rural, agricultural appearance of the land in between reaching both sides of the interfluvium to the river valleys. Sections 9 to 12 of *Setting of Heritage Assets* (HEGPA Planning Note 3 2nd Edition) provide guidance.

The presence of multiple heritage assets and their interdependence for setting and significance should merit greater consideration than we have seen submitted.

37) To what extent could the proposals harm the setting of Holwell Court and Holwellhyde Farmhouse? Has the impact of development on their setting been given adequate considerations in the formulation of the notional layout?

Holwell Court 's designed views are mainly to the south east towards Essendon. However, noise and light pollution from development on the Birchall Garden Suburb site would adversely affect the setting of the house and parkland, especially as the tree belt alongside the A414 entrance to Howel Court is fairly narrow.

Holwellhyde farmhouse is at the apex of the former green of a DMV and surrounded by deep ditches and ancient hedgerows, indicative of early settlement. Further north on the lane there are a series of ancient boundary trees. The rural setting of this house has already been compromised by development at Thistle Grove immediately to the north. Further development would reduce the significance of this 16th century Farmhouse.

Although housing is not indicated close by in the plans so far produced, inspectors dealing with a site in Surrey commented that it would be reasonable to take the illustrative layout as something that would approximate to the form of development.(DCS Number [200-006-528](#)). We have not seen enough detail in the plans to consider that the illustrative plans would definitely not harm the setting of Howelhyde Farmhouse.

We have not seen a suitably detailed consideration of Heritage Impact on these two assets in the documents submitted by the developers. Nor have we see a mapping exercise for the existing trees , hedgerows and other features which would highlight those of historic, as well as ecological, value.

Garden City Principles

Issues

38) Does the proposed new edge to Welwyn Garden City maintain the principles of urban containment upon which the Garden City was founded to the same extent as the original boundary?

No.

Howard's principles, laid out in *Garden Cities of Tomorrow*, includes the following statement:

How shall it [a Garden City] grow?... Shall it build on the zone of agricultural land which is around it, and thus for ever destroy its right to be called a 'Garden City'? Surely not. This disastrous result would indeed take place if the land around the town were ...owned by private individuals anxious to make a profit out of it.'

39) Some of the residential areas appear isolated and remote from the urban areas of Welwyn Garden City. How does this fit in with Garden City principles?

It does not fit in with Garden City Principles

At Welwyn Garden City, spacious housing developments are within easy reach of the town centre and the industrial/commercial centres. The key Garden City principle of an easy commute between house, workplace and leisure could not apply in Birchall Garden Suburb where the proposed developments are divided into two, both remote from the centre of the Garden City and with little public transport or attempt at formation of a community focus. This would conflict with the requirements of the NPPF in its aim of managing growth to make the fullest use of public transport

The underlying landscapes of Capability Brown and Humphry Repton have been respected by the way the WGC housing has been fitted into them and the built environment is leavened with signature trees such as poplars as well as retaining many older specimens. The marrying of town and country with the best of both is largely achieved in Welwyn Garden City. The visual impact of Welwyn Garden City can best be illustrated by going to the top of the car park at the Howard Centre in the very heart of the town. In summer, because of the tree cover, you can barely see any houses or development except the Broadwater Road site immediately opposite on the other side of the railway line. In winter, some of the housing can be seen but it is still very effectively masked

The proposals for Birchall Garden Suburb show no such appreciation of the need for a 'garden' environment, with the green space being concentrated in a green desert on top of landfill with the houses crowded together.

None of the photomontages show the presence of trees designed to enhance the landscape, there are no views and vistas as in the GC, and the idea of a five metre bund to screen the development from the south would give the appearance of a ghetto rather than a place for people's well-being.

We would expect an analysis of a 'Zone of Theoretical Visibility' as defined in section 21 of the new Setting of Heritage Assets (HEGPA Planning Note 3 2nd Edition) to have been included to indicate this aspect of Garden City Principles but have been unable to find this within the submissions.

The opportunities for Garden City type food-growing as in allotments and community orchards are severely limited by the possible presence of unknown contaminants in the soil, and there seems to be no provision for these amenities in the plans submitted.

It has been noted that some mature trees which did exist on part of the site have died prematurely. Remediation for contaminated land, as at Frogmore House in Watford, has resulted in too few trees being replanted due to capping and other constraints, so we would welcome clarity of the likelihood of successful tree planting in BGS..

It is clear that the Garden City principles, both Howard's originals and those updated by the Town and County Planning Association do not apply to the proposed developments at Birchall Garden Suburb.