



**Examination of East Hertfordshire and  
Welwyn Hatfield Local Plans  
Matter 7 Historic Heritage and Urban Design  
Historic England, Hearing Statement  
January 2018**

# Historic England Hearing Statement

## Introduction

- 1.1 In carrying out its role in protecting and managing the historic environment Historic England (HE) gives advice to local planning authorities on certain categories of applications affecting the historic environment. Historic England is the principal Government adviser on the historic environment, advising it on planning and listed building consent applications, appeals and other matters generally affecting the historic environment.
- 1.2 HE is consulted on Local Development Plans under the provisions of the duty to co-operate and provides advice to ensure that legislation and national policy in the National Planning Policy Framework are thereby reflected in local planning policy and practice.
- 1.3 The tests of soundness require that Local Development Plans should be positively prepared, justified, effective and consistent with national policy. HE's representations in relation to the Publication Draft Local Plans are made in the context of the requirements of the National Planning Policy Framework ("the Framework") in relation to the historic environment as a component of sustainable development.
- 1.4 This statement addresses the Inspector's questions with regards Birchall Garden Suburb and the historic environment of the Local Plans.
- 1.5 This hearing statement should be read alongside HE's comments submitted at previous consultation stages of the Local Plan together with our Statement of Common Ground, dated November 2017.

## Inspector's Questions

- 1.6 We set out below our responses to the Inspector's questions in light of our historic environment role.

## Matters and Issues for East Hertfordshire and Welwyn Hatfield Local Plans

### ***Historic England Summary Position***

2.1 *Historic England consider that the proposed Birchall Garden Suburb allocation would cause some harm to the significance of Hatfield House and its park, (which together form a place of the most exceptional architectural, historic and aesthetic value), and a number of other heritage assets both within and around the site. As now put forward, the allocation has been amended so as to limit the degree of harm that the proposed development would cause. Subject to the adoption of the amendments proposed to the policy wording and strategy diagram (see SOCG), Historic England would not object to the allocation, and are satisfied that, should the inspector find the allocation sound in principle, the agreed revised policy and revised strategy diagram offers adequate protection to the historic environment.*

### **Matter 7 – Historic Heritage and urban design**

**There are a number of historic heritage assets within or close to the site, some of which are of national significance. In preparing Local Plans the NPPF requires Local Planning Authorities to recognize that heritage assets are an irreplaceable resource that should be conserved in a manner appropriate to their significance. The Planning (Listed Buildings and Conservation Areas) Act 1990 also requires them to have special regard to the desirability of preserving the setting of listed buildings.**

## Heritage Assets

**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 for the Councils by Beacon Planning)?**

- 2.2 There are a number of heritage assets, both designated and non-designated, within or close to the site. Designated assets include Holwellhyde Farm and Birchall Farm within the site, and Hatfield House and its Registered Park and Garden (RPG) - which together as an ensemble are of exceptional significance -, Holwell Court, Essendon Conservation Area, Panshanger RPG close by.
- 2.3 There are also many undesignated heritage assets within the area (Roman and Saxon elements), Cole Green and other historic designed landscapes, etc.
- 2.4 The historic landscape character is important, in particular the inter-relationship between the historic designed landscapes in the area. There is the clear connection between the former Cowper estates to the east and north -- Panshanger (incl. Cole Green) (II\*), Marden (undesignated), Tewin Water (II) and Digswell (undesignated) -- which were 'linked' into a harmonious and continuous parkland along the River Mimram valley
- 2.5 The evidence base regarding the assessment of the sensitivity of development to nearby heritage assets comprises two parts:
- a) The Panshanger Park and Environs Heritage Impact Assessment (the Beacon Report) (2016)
  - b) A Landscape and Visual Impact produced by David Jarvis Associates (2017)
- 2.6 HE briefly considers each of these in turn.
- a) The Panshanger Park and Environs Heritage Impact Assessment (the Beacon Report) (2016)**
- 2.7 The HIA was commissioned by Welwyn Hatfield and East Herts Councils. It provides a helpful independent assessment of impact of various development sites (including Birchall Garden Suburb) on the cluster of heritage assets in

the area. The report was produced by Beacon Planning, and forms part of the Councils' evidence base.

- 2.8 HE broadly welcomes the findings of the study and considers that this proposes a number of useful development criteria and mitigation measures to reduce the impact of the development upon heritage assets.

**b) Landscape and Visual Impact Assessment.**

- 2.9 A LVIA has been prepared by David Jarvis Associates for Tarmac. HE and the Councils were shown draft extracts from this assessment in February 2017. HE asked to see all of the LVIA and requested a site meeting.
- 2.10 In July 2017 HE (and the Councils) received some additional material, still in draft form. This comprised,
- i) 25 representative viewpoint photographs presented alongside 2D extracts of the same viewpoint location within a 3D computer-generated landform model with the proposed development blocks at the maximum development parameters;
  - ii) one long cross section running from Hatfield House to the A414 junction with Birchall Lane, including Hatfield House and inferred view lines from the Clock Tower and roof with its proposed landscape mitigation measures at completion and 25 years after completion allowing for growth of the proposed vegetation.
- 2.11 Developers, Councils and HE attended a site meeting in July 2017 to consider a number of viewpoints in and around the site. Thereafter, HE wrote to the developers and the Councils, requesting further information, in particular photomontages and also requesting a number of changes to the strategy diagram and policy wording.
- 2.12 The photomontages were received from David Jarvis Associates by HE in October 2017 but only submitted to the Councils in December 2017. The photomontages present views from the edge of Hatfield House RPG (VP113), Essendon (VP38) and close to the edge of Panshanger RPG (VP100 and VP106). The long visibility section presents an assessment of the views from Hatfield House. We understand that field survey photographs were prepared from Holwell Court (97 and 115) although we have not seen this evidence. All work appears to be in accordance with best practice guidance.
- 2.13 To conclude, we consider that there is an evidence base that considers the sensitivity of development to nearby heritage assets comprising the HIA by Beacon and the draft LVIA work by David Jarvis Associates.

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

- 2.14 HE raised concerns regarding the allocation and the potential impact on heritage assets. Therefore, HE has requested further evidence.
- 2.15 In response to the HIA, the July site meeting and the draft extracts of the LVIA HE has requested a number of changes to both the strategy diagram and policy wording in order to ensure that the allocation gives full consideration to the historic environment. HE's position and these agreed suggested changes are set in our Statement of Common Ground dated November 2017.
- 2.16 The Councils have clearly given some regard to the HIA. They have agreed to make some amendments both to the policy wording and strategy diagram in response to the evidence and our concerns.
- 2.17 However, not all the recommendations of the HIA have been incorporated. For example, the report suggests leaving land to the east of Birchall Farm/Henry Wood undeveloped. The HIA found that if Panshanger Registered Park and Garden was to be substantially enclosed by development up to or very close to its boundaries, this would further separate the heritage asset from the context in which it should be experienced and has potential to harm the heritage significance. The HIA recommended that a buffer zone be retained to the west of Panshanger Registered Park and Garden to help mitigate the impact of the development. The Development Concept Diagram in the HIA suggested an area of open space for this parcel of land with no built development. This area is particularly important because it forms part of the setting of Birchall Farm and Panshanger RPG as well as being part of the former Cole Green Parkland, a Capability Brown designed landscape. There are also views across the valley to Essendon Conservation Area and Church.
- 2.18 HE stated that that they did not support development in the area and therefore that the proposed primary and secondary school should be re-located within the proposed allocation. However, the Councils insist that this is the only location for the schools, albeit they have agreed to locate these at the southernmost end of the site. Whilst it remains the preference of HE for no built development in this location, we acknowledge the many competing land use requirements and that there is scope to partially mitigate the harm to designated heritage assets through the siting of the school building envelope and careful masterplanning.
- 2.19 The extent to which the Councils have been able to give full consideration to the LVIA must be questioned. The Councils were shown some of the draft LVIA evidence in February 2017 and further extracts in July 2017. However,

the Councils only received the photomontages in December 2017 and so these cannot realistically have been used to inform the allocation.

**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?**

**a) Hatfield House**

- 2.20 HE considers that development would be visible from the roof terrace of Hatfield House. These views would be partial or glimpsed views and may include built form within the proposed development parcels. Even with the bulk of the development blocks broken up by the irregular form of rooflines and planting along streets and internal to development plots, there may be an urbanising element within part of these wider rural views; however, at a distance of c. 3.0km, this will form part of more expansive views, much of which will remain rural. Given that development will be focussed on the lower portion of the site we understand that development will be less visible and more easily mitigated through landscaping.
- 2.21 The LVIA included an analysis of the potential effect of development on Hatfield House and Hatfield Park (Plan 2284-4-4-1-DR0001-S4-P2). This is a long section running from Hatfield House to the A414 junction with Birchall Lane, including Hatfield House and inferred view lines from the Clock Tower and roof, some existing intervening vegetation at completion and 25 years after completion allowing for growth of the proposed vegetation.
- 2.22 The LVIA indicates that at the present time parts of the development might in theory be visible from the roof and the clock tower of the House. However, with recommended landscape mitigation including roadside hedging, a 5m high planted screening bund and linear park, the LVIA concludes that the potential residual views of the proposed development would be screened from external view in the longer term.

**b) Hatfield House**

- 2.23 From a tour of the RPG in Autumn 2016, HE considers that any views from the RPG are very much glimpsed views. The edge of the RPG is well wooded and contained. Any views would be within wider rural views, and at a distance of approximately 1.7km this will form only part of more expansive views, much of which will remain rural.

- 2.24 The LVIA concludes that the eastern side to the Park lies within a wooded and shallow bowl-like landform which acts to contain views outward. The main north-south axis of the Park is not orientated towards the development site. That said, any views from the margins of the park would be mitigated as outlined above.
- 2.25 According to the LVIA, the photomontage from viewpoint 113 shows proposed buildings south of Birchall Lane would be visible as a thin ribbon of development set well below the skyline. Development north of Birchall Lane would be screened by intervening landform and vegetation. As noted above it is likely that the use of grey coloured roofs would significantly reduce the significance of development compared to that shown in the photomontage. However, HE consider that even with the bulk of the development blocks being broken up by the irregular form of rooflines and planting along streets and internal to development plots there will remain an urbanising element within part of these wider rural views.

### **c) Essendon heritage assets**

- 2.26 The development will be visible from the edge of the Essendon Conservation Area. The photomontage from viewpoint 38 shows that at this distance, while the proposed landscape mitigation helps to provide some screening of parts of the proposed development, the viewpoints are clear in showing that built form within the proposed development parcels will still be visible within the allocation site. Even with the bulk of the development blocks as illustrated being broken up in reality by the irregular form of rooflines and planting along streets and internal to development plots, there will remain an urbanising element within part of these wider rural views.

### **d) Panshanger Registered Park Garden**

- 2.27 The development would be visible from the edge of Panshanger RPG. The photomontage 106 is taken from footpath H23, part of the former Cole Green Estate and close to the edge of Panshanger RPG. The school buildings would be largely screened by vegetation after 25 years establishment and growth. From further back at Panshanger Lane there may well be views over the hedge to roofs, and (potentially) parts of buildings within the proposed development blocks. The urbanising effect may be exacerbated by the treatment of the school playing fields / open space (e.g. structures, fencing, lighting, security measures) which have been excluded from this visualisation.
- 2.28 There is a concern that views to Birchall Farm from footpath Hertingbury 023 are screened not only by the proposed development but also the landscape mitigation. Thus there is an interesting question about the setting of Birchall Farm and maintaining any visual link between it and Panshanger Lane.

2.29 For reference, Panshanger is the Registered Park and Garden whereas Panshanger Park refers to the proposed Country Park which covers only part of the RPG.

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

2.30 Development of this scale will inevitably harm the setting of nearby designated heritage assets, including Hatfield House, the RPGs of Panshanger and Hatfield, Birchall Farm and Holwellhyde Farmhouse. Hatfield House and RPG are both Grade I listed and as such are of exceptional value. The rural feel of the Lea valley, which forms an important part of the setting of Hatfield House RPG, will undoubtedly be altered by virtue of the development of the housing allocation. Birchall Garden Suburb, particularly the development of the schools, will affect the wider setting of the Cole Green site (both within and outside of the Panshanger RPG), especially in views to the Lea Valley (and Hatfield beyond).

2.31 At a strategic level, HE considers that there will still be a degree of harm to the historic environment by development of this scale in this location. However, the range of mitigation measures now proposed will help to reduce the level of harm caused. Subject to the amendments proposed to the policy wording and strategy diagram (see SOCG), the level of harm to designated assets will, to a degree, be reduced by the proposed mitigation put forward. Therefore HE are now satisfied that, should the inspector find the allocation sound in principle, the agreed revised policy and revised strategy diagram offers greater protection to the historic environment. HE will provide further feedback at the masterplanning and planning application stages.

**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 consideration in the formulation of the notional layout?**

**a) Holwell Court**

2.32 The HIA (section 3.9) assesses the significance of Holwell Court and its unregistered historic park and garden. The report states that the strongly planted perimeter boundaries would only have encouraged views south/south west allowing vistas across the River Lea valley. The A414 to the north of the property already impacts upon the setting of the listed building. To that end,

the extent to which the proposals harm the setting of Holwell Court is considered to be limited.

#### **b) Holwellhyde Farmhouse**

- 2.33 Development close to the Farmhouse has the potential to harm its setting. The HIA (section 3.4) assesses the significance of Holwellhyde Farmhouse. Paragraph 4.3.15 of the report concludes that it would be beneficial if an element of open space could be retained in its immediate surroundings to the south which is the most important aspect of its setting.
- 2.34 The LVIA suggests that proposed residential development would be set at a distance from the property boundary, at a lower level and incorporate intervening allotments and small areas of woodland planting. It also recommends that nearby buildings respond sympathetically to the setting.
- 2.35 The strategy diagram includes a symbol for the protection of the setting of this listed building. The proposed amendments to policy wording also identify the need to protect its setting. It is considered that the Local Plan now provides adequate protection to the setting of the listed building although the detail will need to be carefully considered in the masterplanning process.

#### **Garden City principles**

**The original Garden City was founded on a set of principles that sought to establish a settlement that minimized its impact on the surrounding Countryside.**

**A southern boundary known as the “Salisbury Line” was established beyond which it was not considered appropriate for the town to extend in a southerly direction.**

#### **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?**

- 2.36 Inevitably the proposed new edge of Welwyn Garden City is not as contained as the original boundary. But there is clearly a need to accommodate housing growth. It is a question of where this growth is best accommodated.

- 2.37 The Salisbury line is important in so far as it seeks to prevent to coalescence of Hatfield and WGC. To our knowledge, there is no map that shows the actual extent of this line; the precise extent to the east and west remains unclear. The map in the 'Salisbury Line – Supplementary note' shows land included in the 1946 and 1957 land transfers, not the actual Salisbury line. What is clear is that the line was intended to provide, *'an appropriate open belt of country between this town (Welwyn Garden City) and the old town of Hatfield'* (letter from Managing Director of WGC to Lord Salisbury, 16.11.45). The response from Lord Salisbury's representatives on 22.1.46 states that *'the southern boundary of the land in the sale will become the southern limit of the purchaser's town'*. The line is simply defined in the written correspondence and relates to land to the south of WGC.
- 2.38 Birchall Garden Suburb is located to the south east of WGC, rather than the south. In our view, it does not lead to the merger of the two towns. With careful landscaping, together with the clearly defined geographical boundary of the A414, a new southern limit to development can be provided which allows for housing growth whilst maintaining the open feel of the Lea Valley to the south of the A414. Therefore, the new proposed boundary would offer a robust, defensible boundary, following the broad principles of urban containment upon which the Garden City was founded. This is in line with green belt policy. It does not, in our view, breach the Salisbury line.

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

- 2.39 Ebenezer Howard's Garden City Principles included better housing, more space and a new relationship between town and country. More recently the TCPA has re-interpreted these principles to meet today's requirements. Welwyn Hatfield's draft Local Plan proposes a series of Garden City Principles to guide the masterplanning of strategic developments (p131). HE considers that these provide a helpful basis for future masterplanning.
- 2.40 The strategy diagram shows residential areas at some distance from the existing urban area. The distribution of residential development is influenced by the former landfill site. Residential areas will need to be well connected by pedestrian/cycle routes to the main existing urban area in order to encourage more sustainable patterns of transport, thus aligning with principle 8 of the Welwyn Hatfield Garden City Principles.
- 2.41 Whilst this question primarily relates to residential development, the distribution of other land uses also merits some attention. HE has questioned the location of the schools in our representations on the East Herts LP, and

more recently in a site meeting and e-mail to the Councils and developers in July 2017 in which we stated, *'Ideally, we would wish to see no development to the east of Birchall Farm, possibly relocating the schools closer to Moneyhole Lane Park to the south west of Birchall Wood, but still providing a link through to utilise the land to the east of Birchall Farm as playing fields etc. This would have benefits both for the historic environment but also from a general planning perspective, locating the school in a more sustainable location, within the middle of development, closer to residential dwellings and thus promoting walking and cycling to school.'* Whilst HE have accepted the Councils' position that the school needs to be in this location, and agreed that the school buildings should be confined to the southern portion of the site, we continue to have concerns regarding built development in this location, both in terms of the impact upon the historic environment but also from a general planning perspective and desire to ensure the distribution of land uses satisfies the garden city principles and sustainable growth.

Historic England, January 2018