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The Gardens Trust Conservation Committee**

Comments for Matter 4 – Topic Specific Policies

SADM 15 Heritage

99. Does the policy adequately reflect the national guidance in paragraph 134 of the NPPF?

Yes

The guidance in the NPPF 134 is reflected in the policy although 'less than substantial harm' to undesignated heritage assets is described as 'harm to the significance of other heritage assets'. HGT consider that as Historic England continue to refine and augment their national lists of designated heritage assets, this is a more useful way of protecting undesignated assets which may be added to the national lists in the future.

100. Has sufficient attention been paid to NPPG and Historic England's Good Practice Guide 3, when considering the role of setting in the determination of the significance of a heritage asset?

No.

The advice on Setting in the 2nd Edition of HE GPA 3 establishes that the twin roles of setting are that it can contribute to the significance of the heritage asset and allow that significance to be appreciated.

The NPPG on *Conserving and Enhancing the Historic Environment* states 'In developing their strategy, local planning authorities should identify specific opportunities within their area for the conservation and enhancement of heritage assets'.

There is nothing within this policy which outlines either a determination to take a positive role in active conservation or enhancement of heritage assets and their settings (whether designated or not) including positive new uses, consistent with their significance, of assets which would otherwise decay through disuse or neglect.

Policy SADM 15, although noting that Heritage Statements, Impact Assessments of Archaeological Assessments would be required if there is likely to be an impact on significance of heritage assets from proposed development does not specifically state that this should include any impact on its setting. Given that setting is not widely well understood, we consider that this should be specified and the term 'setting' defined within the document.

Paragraph 12.43 requires an appropriate programme of historic building recording including a photographic record. A photographic record is insufficient by itself and we would suggest that a full report also includes detailed architectural drawings.

101. Is it sufficiently clear as to what controls are to be put in place to regulate development in order to preserve and enhance the character and appearance of Welwyn Garden City, which is an internationally recognized site?

It is not clear at all

We would like to see specific consideration of the Garden City within the various categories of heritage asset included with this policy. Howard laid down Garden City Principles, which have been updated by the Town & Country Planning Association. These need to be included and actions specified to conserve and enhance the Garden City. The town centre 'City Beautiful' approach and the adjacent spatial planning following Parker and Unwin's radical ideas are still extant though the wider area is in danger of losing its Garden City definition. At present the Garden City has conformed roughly to the shape and extent envisaged in the original plan. This should be safeguarded. As Welwyn Garden City is the second one built to Howard's principles which built on and refined the ideas expressed at Letchworth (and was therefore considered by Howard to be more successful) this most important heritage asset in the borough merits more detailed consideration and measures identified to safeguard it for the future. This should relate not only to the City but also to the 'Agricultural (later Green) Belt' which he specified should surround it.

102. Why is there no reference to locally listed buildings?

A Register of Locally Listed buildings is essential. Without such a list it is not possible to assess relative significance across the borough. We would also wish to see a Register of Locally Listed Buildings and Landscapes At Risk, similar to that held nationally by Historic England for designated heritage assets.

104. Without a mechanism requiring sites with the potential to contain heritage assets to be adequately assessed, how can the policy be fully effective at conserving the historic environment?

Buildings and landscapes were often designed in tandem and are viewed in tandem with the landscapes providing a setting for the buildings (and the building being part of the landscape). It would be useful to have such an integrated list. We consider that the policy lacks specific actions to assess the significance of identified heritage assets, to identify new ones and to enhance as well as conserve these assets. We welcome the fact that the finite nature of these resources is recognised in the policy but dismayed that no positive measures are outlined to enable these to be safeguarded and put to beneficial use in the future.

The NPPF (Para 126) which states that the 'wider social cultural, economic and environmental benefits that conservation of the historic environment can bring' is nowhere recognised in the policy in terms of actions to facilitate these.

We note that the Conservation Principles (2008) advice from Historic England is being updated and is out for consultation currently where the assessment of significance is one of the matters included. HGT has contributed to the Garden's Trust comments on this document.