



Historic England

Examination of Welwyn Hatfield Plan

Stage 8

Northern Settlements

Policy SADM 27, Site HS 15 (WGr1), Land east of London Road

Matter 1 – Historic Heritage

Historic England, Hearing Statement

April 2020

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. Historic England 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.

The tests of soundness require that Local Development Plans should be positively prepared, justified, effective and consistent with national policy. Historic England's representations on the Publication Draft Local Plan 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.

Historic England Hearing Statement

Introduction

- 1.1 This statement addresses the Inspector's questions with regards Land east of London Road, Policy SADM 27, Site HS 15 (WGr1) of the Local Plan.
- 1.2 This hearing statement should be read alongside Historic England's comments submitted at previous consultation stages of the Local Plan and our statement of Common Ground with Welwyn Hatfield dated December 2017 [EX31 SOCG between WHBC and HE](#).

Matters and Issues for Welwyn Hatfield Local Plan

Issues

Policy SADM 27, Site HS 15 (WGr1), Land east of London Road

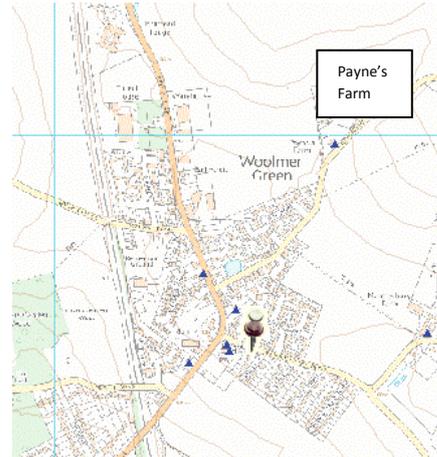
Matter 1 – Historic Heritage

Payne's Farm is a heritage asset 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.

Woolmer Green Site SADM27, 15



Heritage assets



1) To what extent has the proposal had regard to the available heritage evidence?

- 2.1 The site promoter has submitted a Historic Environment Desk Based Assessment at Regulation 19 consultation stage. The report is dated 2015. The report focussed primarily upon archaeology and concludes that it is likely that archaeological field evaluation works would be required. It is therefore surprising the site specific requirements for the site in the Local Plan do not include archaeological field evaluation. We recommend that the criteria be amended to include this requirement for the site.
- 2.2 There is some mention of the adjacent grade II listed Paynes Farm, in the DBA report. However, there is little or no discussion on the likely impacts of development upon the significance of that asset not of any necessary mitigation measures needed to protect the asset. Ideally a Heritage Impact

Assessment (HIA) of the site should have been undertaken to inform the allocation including any proposed mitigation necessary.

- 2.3 We note that despite the lack of an HIA, the Council is proposing a landscaping buffer along the eastern boundary which should help mitigate any harm. The policy also proposes an HIA at planning application stage, presumably to further inform the nature and scale of the mitigation.

2) To what extent does the site impinge upon the setting of the Listed Building?

- 2.4 The site does form part of the wider setting of Payne's Farm. The historical maps show that the site has been in continuous agricultural use in recent centuries. The site relates to the farm in terms of both its historic and current use.
- 2.5 Payne's Farm is well screened by vegetation. Some of the agricultural/rural setting of the farmhouse would be retained. With further screening as part of a mitigation strategy along the eastern boundary of the site, the extent of the harm to the significance of the listed building would be reduced.
- 2.6 As we advised during both the regulation 18 and 19 consultations although there would be some harm caused by the proposed development, it should be possible to develop this site without causing unacceptable harm to the significance of the farmhouse. At regulation 19 we welcomed the reference to the Landscape buffer to protect the heritage asset as well as the requirement for an HIA.

Table 11 says that a landscape buffer is to be established to the east of the site to protect the setting of the adjacent listed building.

3) In the context of the site boundaries on the proposals map, where is this buffer to be?

- 2.7 It is our interpretation and understanding that there is to be a landscape buffer along the northern boundary of the site to protect the Green Belt/wider landscape and form a defensible boundary, as well as a landscape buffer along the eastern edge of the site to protect the setting of the listed building.

4) How wide is this buffer expected to be?

- 2.8 There is no indication in the Local Plan regarding the size of this buffer. The site promoter has included an illustrative layout in the Regulation 19 response. However, this does not form part of the Plan. We note that the proposed buffer along the northern boundary is much wider than that proposed for the heritage asset. We suggest that the buffer for the heritage asset should be wider than that shown on the illustrative layout.

5) In this context would the development be harmful to the setting of the heritage asset?

2.9 There would be a degree of harm to the significance of the heritage asset caused by development within its setting, i.e. on the site but the degree of harm would be reduced by the provision of a landscape buffer.

6) If not, why not?

2.10 See above

7) Would any harm be substantial and if not, what weight should be given to it?

2.11 The harm to the significance of the heritage asset would be less than substantial harm. Paragraph 193 of the NPPF makes it clear that ‘when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance’.

2.12 Paragraph 194 of the NPPF goes on to state that ‘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’.

2.13 Clear and convincing justification will therefore need to be provided for any harm to the significance of the asset.

8) Has the impact of development on the setting of the heritage asset been given adequate consideration?

2.14 Any evidence needs to be proportionate. Ideally an HIA would have been undertaken to inform the site allocation. However, in the absence of this a DBA has been prepared by the site promoter and the Council have also proposed what would seem to be reasonable mitigation measures to at least in part address some of the harm caused to the significance of the heritage asset by development within its setting.

Conclusion

2.15 Historic England is satisfied that, subject to the inclusion of a criterion for archaeological field evaluation and also greater detail regarding the width of the landscaping buffer (ideally to be informed by an HIA either now or at application stage), the allocation is broadly acceptable.

