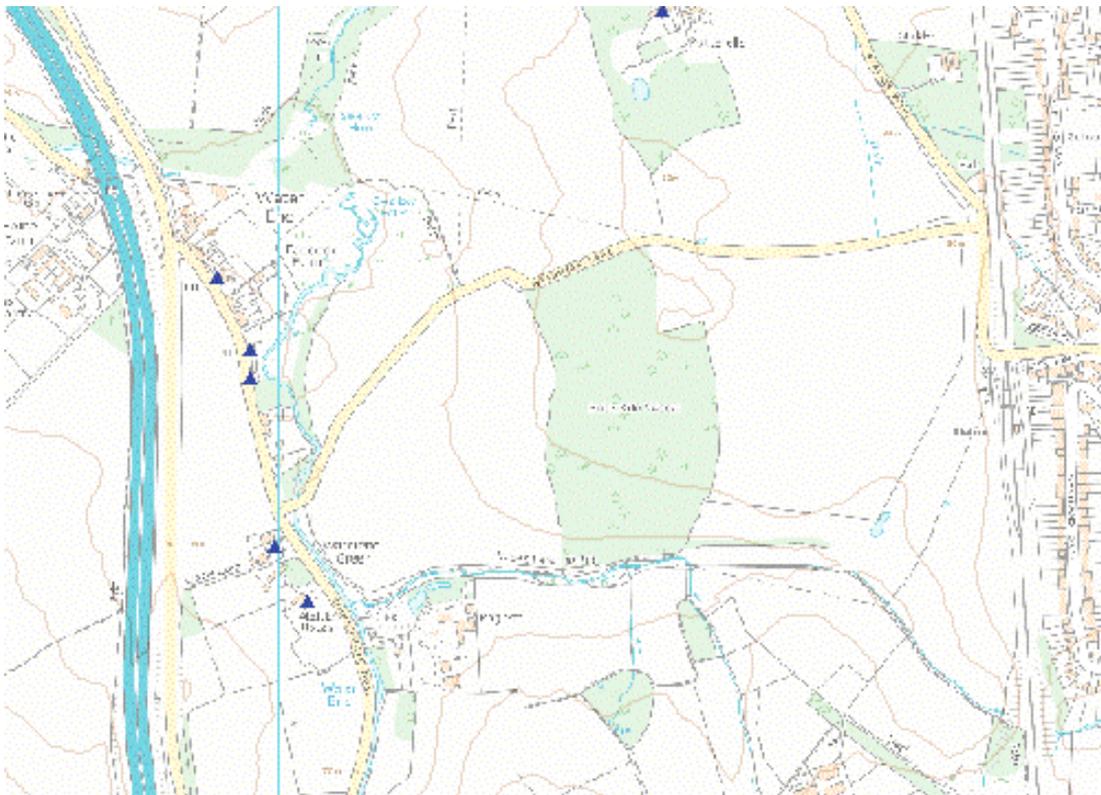


Historic England – Note on Brookmans Park Site HS22

October 2020

Following the hearing sessions in August 2020, Historic England has been asked by the Inspector to comment upon new proposed access arrangements into site HS22 at Brookmans Park.

Map showing site and nearby designated heritage assets.



Historic England's Regulation 19 comments on Local Plan – October 2016

In 2016, at Reg 19 stage, Historic England made the following comments in relation to this site:

Site HS22

Development on this site is unlikely to have any direct adverse impact on any designated heritage assets and their settings. The listed building to the north of the site is largely set behind woodland. Similarly the 5 listed buildings at Water End are at some distance from the site and there is a substantial woodland buffer between. However, we would suggest that consideration should also be given to the impact of traffic movements generated by the allocation of the site on the listed buildings in

Water End and Welham Green and the registered park and garden at Brookmans Park. Such consideration should inform whether the site should be allocated and, if it were to be, the number of houses proposed. We note some consideration has been given to accessing the site in Table 15 and paragraph 21.4 which is to be welcomed.

Historic England's Hearing Statement - April 2020

Historic England submitted a hearing statement in response to questions raised by the Inspector. Our responses in relation to Brookmans Park are set out below:

Matter 1 – Environmental Considerations

83) Would the proposal have an impact on the setting of any listed buildings?

2.1 There are no designated heritage assets within the site boundary. There is a grade II listed walled gardens and adjoining house at Potteralls approximately 400m to the north of the site. There are five listed buildings (all grade II) approximately 350m to the west of the site in Water End. Gobion's Registered Park and Garden (listed at grade II) lies approximately 800m to the east of the site.

2.2 As we stated during the Regulation 19 consultation, development on this site is unlikely to have any direct adverse impact on any designated heritage assets and their settings. The listed building to the north of the site is largely set behind woodland. Similarly the five listed buildings at Water End are at some distance from the site and there is a substantial woodland buffer between.

2.3 However, we would suggest that consideration should also be given to the impact of traffic movements generated by the allocation of the site on the listed buildings in Water End and Welham Green and the registered park and garden at Brookmans Park. Such consideration should inform whether the site should be allocated and, if it were to be, the number of houses proposed. We note some consideration has been given to accessing the site in Table 15 and paragraph 21.4 which is to be welcomed.

84) If so to what extent would there be harm? And could it be mitigated?

2.4 We do not know if the Council or site promoter has undertaken any further work to consider the impact of traffic movements on nearby heritage assets as we suggested at Regulation 19.

EiP – Hearing sessions and the issue of site access.

We understand that the developers are now proposing to take access to the site off Bradmore Lane, rather than Station Road as previously intended. Bradmore Lane is a narrow rural lane that leads from Brookmans Park to Water End. Importantly there are 5 grade II listed buildings within Water End.

There has been considerable discussion at the Hearing Sessions on the merits or otherwise of this access arrangement. After the hearing session in September 2020 the Inspector has asked Historic England to comment on these new access proposals.

Historic England's main concern has always been the potential for traffic movements generated by the allocation to impact upon the settings of the listed buildings in Water End and Welham Green as well as the registered park and garden at Brookmans Park. Heritage assets can be harmed through development in their settings, and traffic movements could fall into this category.

We note the developers are proposing the realignment of the access at Bradmore Lane and Station Road and various traffic management measures (signs, restrictions etc) to restrict the flow of traffic to the west along Bradmore Road. The broad principle and stated intention of these traffic management measures is welcome; i.e. to direct traffic away from Water End and out onto Station Road in an easterly direction.

But it is unclear to us (and indeed from listening to the EiP hearing session also unclear to the County Council) what proportion of traffic generated by the development is likely to head west along Bradmore Lane. In addition, it is unclear to us how effective the proposed measures would be in preventing traffic from using this westerly route. Without this information it is difficult for us to comment on whether this would be acceptable or not in terms of the impact on the settings of the listed buildings at Water End. The detail in relation to highway movements and traffic measures is essentially a highway rather than a heritage matter and we are not in a position to comment on that level of detail.

We note that there was some mention during the hearing session of non-designated heritage in the form of tank traps at the junction of Bradmore Lane and Station Road and possible implications of any road re-alignment in that area. Non-designated heritage such as this is a matter for the Local Planning Authority rather than Historic England to address.

Historic England must continue to conclude that that our primary concern is that sufficient consideration is given to protecting the significance of designated heritage assets (listed buildings and registered parks and gardens) including any contribution made to that significance by setting. That includes the impact of traffic movements on these assets and their settings. Ultimately it is important to us that proper

consideration is given to these matters both at plan-making and planning application stage and we would recommend that this be referred to in the policy and supporting text of the Plan.

We understand that there is a proposed modification to the wording for the access arrangements to this site at paragraph 21.4 to read:

~~*In line with advice from the Highway and Fire and Rescue Authorities, there will be a single point of access for site HS22 (BrP4). A secondary access using Bradmore Lane will be resisted as it would need to be widened and upgraded which would change its rural character. The estimated dwelling capacity of HS22 has been limited to around 250 dwellings to reflect the limited opportunity for expanding the existing primary school by 0.5FE from 1.5FE to 2FE.*~~

Access arrangements will be examined in further detail as part of the planning application process to ensure the delivery of a high quality residential environment. An access from Bradmore Lane will only be permitted if it can be shown to maintain the rural character of Bradmore Lane, and comply with the relevant highway safety standards and provide the necessary mitigation measures.

We suggest the addition of the words, *'including minimising traffic movements around the listed buildings in Water End.'* at the end of the proposed modification to ensure that appropriate consideration is given to this matter.

We do not have sufficient information to conclude at this stage, one way or another, whether the measures proposed by the developer will have the desired effect in terms of directing traffic away from Water End and the listed buildings. In any event this is essentially a highways matter, albeit with a heritage angle in respect of the designated assets and their settings. What is important is that appropriate consideration is given to this matter.