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Planning Policy  
Welwyn Hatfield Borough Council  
The Campus  
Welwyn Garden City  
AL8 6AE

Direct Dial: [REDACTED]

Our ref: PL00035518

20 October 2016

Dear Mr Haigh

**Welwyn Hatfield Draft Local Plan Proposed Submission August 2016 (including Sustainability Appraisal and Infrastructure Delivery Plan).**

Thank you for your e-mail dated 19<sup>th</sup> August consulting Historic England on the above document. As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process. We therefore welcome this opportunity to comment. We have had the opportunity to assess the consultation documents and can offer the following advice. This follows two previous consultations and our comments dated 31<sup>st</sup> January 2013 and 18<sup>th</sup> March 2015.

**General Comments**

Overall we welcome the Plan. It is noted that the plan contains both a strategic policy relating to the historic environment, as well as a development management policy pertaining to historic assets. Site specific policies generally refer to the historic environment where necessary which is to be welcomed.

On occasions however, site specific policies do not provide sufficient detail or clarity to aid developer or decision maker. As such, as currently drafted, the plan is unsound in terms of its effectiveness, deliverability and consistency with national policy. Paragraph 157 of the National Planning Policy Framework requires Local Plans to provide detail with site allocations where appropriate (fifth bullet point), with the Planning Practice Guidance stating "where sites are proposed for allocation, sufficient detail should be given to provide clarity to developers, local communities and other interests about the nature and scale of development (addressing the 'what, where, when and how' questions)" (PPG Reference ID: 12-010-20140306 (last revised 06/03/2014)). Paragraph 154 of the NPPF also states that only policies that provide a clear indication of how a decision maker should react to a development proposal should be included in the plan. Conservation of the historic environment is a core planning principle (Paragraph 17) and Local Plans should set out a positive strategy in this respect (Paragraph 126).



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To this end, and in order to make the Plan sound, we suggest a number of minor modifications to the Plan outlined in detail below (see Specific Comments section).

We have particular concerns regarding the following allocations:

- South East of Welwyn Garden City
- North West Hatfield
- Marshmoor
- Symondshyde

Our concerns with respect to these sites are set out in full below.

We also note that there is no reference to locally listed buildings and a Local List. We consider this to be a significant omission from the Plan.

### **Specific Comments (in plan order)**

#### **Section 2 Welwyn Hatfield Now**

Paragraph 2.10 We welcome the identification of the Borough's unique heritage including conservation Areas, listed buildings and structures, historic parks and gardens and the garden city itself. It might also be helpful to include reference to the 4 Scheduled Monuments in the Borough and the Heritage at Risk Register of which there is one building or structure on the register in the Borough.

#### **Section 3 Vision and Boroughwide Objectives**

##### **Spatial Vision**

We welcome reference to heritage issues in the overall Spatial Vision for Welwyn Hatfield. We note reference to the Garden City and New Town heritage in the 6<sup>th</sup> paragraph and reference to the wider historic environment in paragraph 7 of the Vision.

We also broadly welcome Strategic Objective 8 which addresses the historic environment. However, we suggest the deletion of the words 'where possible'.

Policy SP1 bullet point 4 relates to heritage issues. We would suggest the minor amendment to replace the words, heritage assets with historic environment. This is considered the most appropriate term to use as a topic heading as it encompasses all aspects of heritage, for example the tangible heritage assets and less tangible cultural heritage. Indeed, this point applies throughout the plan.





## Section 6 Settlement Strategy and Green Belt boundaries

As previously advised, in terms of larger strategic housing sites released from the Green Belt, we consider that large areas of open space that form part of the overall masterplan should remain in the Green Belt, as it provides greater clarity over the function and appearance of land (see paragraph 81 of the NPPF). It is an approach that has been followed in other locations such as larger housing sites on the edge of Cambridge. In the case of Panshanger Aerodrome for example, this approach would help to provide a clearly defined buffer for heritage assets, particularly the registered park and garden of Panshanger. We suggest that the same approach should be followed at Birchall Garden Suburb, rather than defining the land as Urban Open Land (230).

### Figure 6 Key diagram

The Key diagram sets out a broad spatial strategy for the Borough. However, it is considered that the diagram is potentially misleading in respect of the strategic housing site to the south east of Welwyn Garden City (SDS2). The diagram implies that the whole area is allocated for housing. However, comparison with Policies Map 3 reveals that approximately half of the site within the Borough is in fact allocated as Urban Open Land 230.

Further advice in relation to the proposed allocation at Symondshyde is provided later in respect of Section 24.

## Section 12 Environmental Assets

### Policy SP11 - Protection and enhancement of critical environmental assets

We welcome the inclusion of this strategic policy addressing critical environmental assets including the historic environment. In particular, we welcome reference to the consideration of assets commensurate with their status, significance etc. We also welcome support for development that secures positive improvements and long-term conservation of such assets together with the support for the designation of heritage assets where appropriate.

### Policy SP12 - Strategic Green Infrastructure

We welcome the inclusion of policy SP12 Strategic Green Infrastructure. There is some mention of heritage values in respect of the corridor although we consider that greater reference could be made to this. Heritage assets can both benefit from green infrastructure proposals and can be green infrastructure assets in themselves (e.g. archaeological sites, historic parks and gardens and open spaces within conservation areas and the grounds of listed buildings). The indicative links shown in Figure 8





connect heritage assets such as Hatfield Park and Panshanger Park. However, we would suggest that the corridor should be widened through site SDS2 to provide greater protection to the setting of Hatfield House Registered Park and Garden and to retain the feeling of a green corridor and rural approach when travelling along the A414 towards Hatfield.

#### Policy SADM 15 Heritage

We welcome inclusion of a policy addressing heritage. We note that it addresses both designated and non-designated assets including archaeology.

However, we note that there is no specific mention of locally listed buildings or a Local List. We had previously advised that this would be important. In national policy terms, 'non-designated heritage assets' (including those on a local list) are recognised as having a degree of significance meriting consideration in planning decisions.

Paragraph 135 of the National Planning Policy Framework states that decisions on applications affecting such assets will require a balanced judgement that has regard to the significance of the asset and any harm or loss. Government guidance recognises that local lists and local criteria for identifying non-designated heritage assets are a positive thing and can help with decision-making. We would recommend that as a minimum a local authority has established criteria for identifying non-designated heritage assets, and ideally has a local list of assets linked to planning policies in their Local Plan. Given this omission, we consider that the plan is unsound as it is not consistent with national policy.

We welcome the supporting paragraphs relating to conservation Areas, Listed Buildings, Historic Parks and Gardens and Scheduled Monuments.

We advise that Scheduled Monuments should be referred to as such, not ancient monuments (para 12.34) or Scheduled Ancient Monuments (para 12.46). We suggest minor amendments for consistency with NPPF terminology.

#### **Section 14: Welwyn Garden City**

We welcome reference to the unique heritage of Welwyn Garden City as a garden city following the vision of Sir Ebenezer Howard together with its later designations a New Town. In particular we welcome the Garden City Principles set out for masterplanning strategic development and the importance of respecting its heritage. We also welcome the Vision for WGC that highlights the unique heritage and its conservation. However, we would suggest a minor amendment with the addition of the words 'and enhancement' after the word 'Conservation' to read 'the conservation and enhancement of its heritage assets'

Following on from this, we are pleased to note the inclusion of policy SP15 which



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addresses the Historic Environment of Welwyn Garden City. This will be helpful in encouraging that new development respects the historic environment and the unique heritage of Welwyn Hatfield as a garden city and Mark One New Town.

## Policy SADM 19 Town Centre North Development Site MUS1 (Han40)

We have previously commented that the site lies within the existing Welwyn Garden City conservation area but appropriately scaled and well-designed would be capable of meeting the requirement to preserve or enhance the character or appearance of the conservation area. We note that cross reference is made to Policy SADM19 which includes a requirement to preserve and enhance the character of the Conservation Area which is to be welcomed. However, for clarity and completeness we suggest a minor modification with the addition of the words, 'and setting'.

## Policy SADM20 Acceptable uses outside the Welwyn Garden City Core Retail Zone

We welcome reference to the need to preserve and enhance the Conservation Area in this policy. However, for clarity and completeness we suggest a minor modification with the addition of the words, 'and setting'.

## Policy SADM21 Housing Allocations in Welwyn Garden City and Table 9

## SDS1 North East of Welwyn Garden City and policy SP18

This site incorporates part of a WWII airfield that originally served as a decoy airfield and factory site representing the de Havilland factory at Hatfield, and was subsequently used as a training airfield. In 2014 Historic England was asked to consider two of the surviving airfield structures for inclusion on the national list and concluded that they did not meet the criteria for inclusion. However, these and a number of other surviving structures on the site may be of local significance. The LPA will therefore need to assess the value and local significance of these structures to determine whether some or all should be retained. We note that the site has already been considered for designation as a conservation area, and that the LPA concluded it did not meet the criteria of special architectural or historic interest as set out in paragraph 127 of the NPPF.

During the previous consultation Historic England commented that in the event that this site comes forward for redevelopment, we note that the eastern end of the site is in close proximity to, and visible from the Grade II\* Registered Park and Garden of Panshanger. Careful consideration would need to be given to the scale of buildings and boundary treatment in this area, together with the siting of houses in relation to the northwest edge of the airfield's plateau and views up from the River Mimram valley. We therefore welcome the eighth bullet point of policy SP18 which refers to the need for the site to provide protection and enhancement of heritage assets, both on-site and



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in the wider area through appropriate mitigation measures. In addition we welcome bullet point 11 which requires structural landscaping to minimise visual impact on the surrounding heritage assets.

Following our request during the previous round of consultation, we are pleased to note that the Local Authority has commissioned Beacon Planning to undertake a Heritage Impact Assessment of the potential impact of development in this location. We note the findings of the Heritage Impact Assessment by Beacon Planning which provides advice on the development criteria and possible mitigation measures for this site. This is to be welcomed. It would be helpful if reference was made to the report in the policy and supporting text in order that it can inform future masterplanning and mitigation measures.

There are strategic cross-boundary development issues in this location given the proximity of East Hertfordshire. With an exceptionally significant heritage asset in the form of Panshanger registered park and garden affected by these cross-boundary issues, we would expect Historic England to be actively involved in on-going and constructive duty to cooperate discussions. We look forward to such discussions in the near future.

#### SDS2 South East of Welwyn Garden City and policy

This is potentially a large allocation for approximately 1,200 dwellings.

The proposed development would be visible from along the ridge across the valley and from parts of the Hatfield Estate and Registered Park and Garden, an ensemble of the highest significance. Careful consideration should be given to the extent of the proposed development and in particular the potential impact upon the setting of the Historic Park and Garden of Hatfield House and its associated listed buildings to the south. In addition, given the topography of the land, development in this location will lead to the spilling of urban form over the ridge and down towards the A414. Currently the A414 is surrounded by a green corridor, giving an open rural feel and important separation between Welwyn Garden City and Hatfield.

We therefore are concerned that the allocation extends too far south and as currently shown would lead to an erosion of the setting of Hatfield House. This would have important implications for the indicative capacity of the site. Development should be set back from the A414 and should not extend down the south facing slope in order to retain this open rural approach and setting. The boundary should be redrawn to reflect this and the indicative capacity of the site reduced accordingly. Careful masterplanning and appropriate mitigation measures will be required to minimise the impact of the development upon the setting of Hatfield House Historic Park and Garden and also to retain a rural feel and important separation between the two towns. This should also inform the ultimate dwelling capacity of the site.



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We noted in the previous consultation that there is a grade II listed farmhouse that dates from the late 16<sup>th</sup> or early 17<sup>th</sup> century (Holwellhyde Farmhouse) immediately adjacent to the northeast boundary of the allocation and development of this site could result in the urbanisation of the setting of this farmhouse, divorcing it from open agricultural land which currently is an intrinsic part of its setting. Historic England recommends that should this site be brought forward for development, consideration is given as to how the setting of Holwellhyde Farmhouse might be protected, either through a revision to the boundary in the immediate vicinity of the farmhouse, or through a requirement for public open space to be used to form a buffer between the farmhouse and the new housing. Heritage issues should be covered in the masterplan.

Following our request during the previous round of consultation, we are pleased to note that the Local Authority has commissioned Beacon Planning to undertake a Heritage Impact Assessment of the potential impact of development in this location. We note the findings of the Heritage Impact Assessment by Beacon Planning which provides advice on the development criteria and possible mitigation measures for this site which is to be welcomed. It would be helpful if reference was made to the report in the policy and supporting text in order that it can inform future masterplanning and mitigation measures.

In view of the sensitive nature of this landscape and the historic settings, we welcome the requirement at bullet point 10 of policy SP19 for the protection and enhancement of heritage assets and their setting, both on-site and in the wider area through appropriate mitigation measures. We would also add the words, 'careful masterplanning and' before 'appropriate mitigation measures'. However, more fundamentally, the extent of the site allocation and indicative capacity should be reduced to step back from the A414 and avoid development encroaching on the south facing slope which has the potential to affect the setting of Hatfield House and the Registered Park and Garden.

#### Sites SDS3 and SDS4 Policy SP17

Historic England have previously advised that the mixed use (employment/residential) site is immediately adjacent to the Welwyn Garden City conservation area and contains the grade II listed former Shredded Wheat factory. There is a further grade II modern movement listed building immediately to the south of this site. Historic England is keen to see the most significant elements of the former Shredded Wheat factory retained and brought back into suitable use that would then ensure the future of this important listed building complex, and we have provided detailed guidance on both pre-application proposals for the listed building and the redevelopment of the brown field site to the south. We have no objection to the principle of redevelopment of this site for mixed employment and residential use, but it will be important to ensure





that most significant elements of the listed factory are retained (including the 'heroic' scaled silos), while the scale form massing and disposition of new buildings will require careful consideration to avoid harm to nearby designated heritage assets (including long views from the grade I listed Hatfield House).

We therefore welcome the requirement at clause iv) to use industrial heritage as a cue for form, character and identity - re-use listed structures and ensure sympathetic development.

Sites HS1, HS3, HS4, HS5, HS7 and HS8

Historic England is satisfied that development/redevelopment of these sites for residential use would not adversely impact on any designated heritage assets and we do not wish to comment in detail on these sites.

Site HS2

We have previously advised that development of this site for residential use would not adversely impact on any designated heritage assets. However, we also advised that the southern edge of both these sites would form the new boundary of Welwyn Garden City with the Green Belt and careful consideration would need to be given to this edge condition as part of any development proposals. To this end it would be helpful to add a minor modification to the plan adding a further bullet point to Table 9 to this effect, stating that 'Careful consideration needs to be given to the boundary treatment with the Green Belt'.

Site HS6

We note mention in Table 9 of the fact that the site is partly within the Welwyn Garden City Conservation Area.

In order to make the plan sound we suggest the table should include the following words are added as a minor modification to provide greater clarity. Development will need to preserve and enhance the character of the Conservation Area and its setting.

## Section 15: Hatfield

We welcome objective 3 which recognises the role of the town's heritage with Hatfield House, old Hatfield its aviation history and new town legacy.

Policy SADM26 New Dwellings in Hatfield

Site SDS5 North West Hatfield





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This is a large allocation (for 1650 dwellings). There is a grade II listed building; Old Cottage, which has been excluded from the site boundary but is surrounded by the allocation. Given the revised boundary of the allocation there is a greater likelihood that the setting of the listed building would be harmed. Historic England is content for the LPA to assess the potential impact of development on this heritage asset and to put in place appropriate measures to protect its setting. The masterplan should address heritage issues, including the above listed building. We welcome bullet point 10 relating to the protection and enhancement of heritage assets etc., but given the fact that the allocation now effectively encircles the property, perhaps this bullet point should be more specific about the protection of the setting of the listed building and requiring the provision of the open space around the property and/or tree planting to act as a buffer/protection of the setting of the listed building.

Two areas of the of the site lie in an Area of Archaeological Interest. Given these designations it would be appropriate for the policy to make reference to this and the need for appropriate archaeological assessment to be undertaken in order to inform the masterplanning process and any mitigation measures required.

Further to the north of the allocation is Brocket Park, a registered park and Garden and also a cluster of listed buildings/structures around the village of Lemsford. 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 and structures in Lemsford and the registered park and garden at Brocket Park. Such consideration should inform whether the site should be allocated and, if it were to be, the number of houses proposed and any traffic mitigation measures required.

### MUS2 and MUS3

Both these sites are for redevelopment of areas first developed in the post-war period. We have previously advised that Site MUS3 has the grade II listed Church of St John the Evangelist (1958-60) immediately adjacent, but this church was specifically designed for an urban context and appropriately designed redevelopment of the site would not result in harm to its setting. Site MUS2 is visible from Hatfield House and the scale of any new development would need to be carefully considered. Over-tall development could adversely impact on the setting of Hatfield House (grade I listed).

We note that Table 10 makes no mention of these important site specific considerations. We suggest that the following bullet points are added to the table

### MUS2

- The scale of the proposed development should respect the setting of Hatfield House (grade I listed).

### MUS3



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- Development should be appropriately designed to respect the setting of the grade II listed Church of St John the Evangelist

## HS9

We note that table 10 states that the sites specific considerations should include mitigating any potential heritage impacts on Hatfield House Historic Park and Garden. However we also suggest the addition of the words 'and the protection and enhancement of Old Hatfield Conservation Area and its setting'.

## Sites HS10, HS11, HS14

Historic England is satisfied that development/redevelopment of these sites for residential use would not adversely impact on any designated heritage assets and we do not wish to comment in detail on them.

## HS13

Low rise residential development on this site is unlikely to have an adverse impact on any designated heritage assets (including longer views out from Hatfield House and the Grade I Registered Park and Garden) and we therefore do not wish to comment in detail on this site.

## Urban Open Land

We note the proposed designation of urban open land along Mosquito Way on the former Hatfield aerodrome site (UOL218). This forms a key part of the approach past the Grade II\* listed hanger, offices, fire station and control tower, so we welcome efforts to safeguard the setting and significance of this important heritage assets.

## Section 16: Woolmer Green

### Site HS15

We have previously advised that this site has a grade II listed farmhouse (Payne's Farmhouse) immediately to the east, but it should be possible to develop this site without causing unacceptable harm to the significance of the farmhouse. To the west and northwest of the site are two employment sites, neither of which would adversely impact on any designated heritage assets.

We welcome reference in Table 11 to the need for a landscape buffer to the east to protect setting of adjacent listed building and also the requirement for a Heritage Impact Assessment at planning application stage.





### **Section 17: Oaklands and Mardley Heath**

Sites HS16, HS32 and HS17

None of these sites would adversely impact on any designated heritage assets and therefore Historic England does not wish to comment in detail on them.

### **Section 18: Welwyn**

Sites HS18 and HS19

None of these sites would adversely impact on any designated heritage assets and therefore Historic England does not wish to comment in detail on them.

### **Section 19: Digswell**

We welcome reference to the character appraisal and reference to the Digswell Viaduct at paragraph 19.2. We suggest the minor modification to read Preserve Protect and enhance the setting of the Grade II\* listed Digswell Viaduct.

### **Section 20: Welham Green**

Site HS35

This small site is unlikely to have an adverse impact on any designated heritage asset and therefore Historic England does not wish to comment in detail. The site is well screened by trees and also by the bridge and is set at some distance from the historic park and garden of Hatfield House.

Site SDS7 Marshmoor

As previously advised, in spite of its current partly scruffy appearance, the strip of land between the southwest boundary of Hatfield House (grade I registered park and garden) and the railway currently buffers the park from Welham Green. Enhancement of the landscape quality of this land would also enhance the significance and setting of the grade I Registered Park and Garden. Historic England previously recommended that further development is not brought forward for this area in order to ensure separation between the main built up area of Welham Green and the Registered Park and Garden.

However, we note that the Plan is still proposing that this site is brought forward. This could potentially have a significant negative effect on the registered park and garden of Hatfield House notwithstanding the existing A1000. We note that Policy SP23 states that a Heritage Impact Assessment may be required and also includes





reference to heritage matters in criteria vi, vii, and ix which is to be welcomed. We also note that careful consideration will be required with respect to landscaping. To this end, we are satisfied that reasonable measures are in place to help protect and enhance the setting of the heritage asset.

## Section 21: Brookmans Park

Sites HS21 and HS23

Historic England is satisfied that development of these sites for residential use would not adversely impact on any designated heritage assets and we do not wish to comment in detail on them.

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.

## Section 22: Little Heath

Site HS24

Historic England has previously advised that the proximity of Gobions (Grade II Registered Park and Garden) and the Grade II\* listed Folly Arch is an issue that needs to be addressed, but it may be possible for some development to come forward without causing unacceptable harm to these designated heritage assets. There should be a requirement for careful consideration to be given to views to/from Gobions and the Folly Arch, including retaining and reinforcing the existing hedgerow and trees along the north-western boundary. We therefore welcome bullet point one of Table 16 where there is a requirement for a Green buffer to help mitigate heritage impacts on Gobions Historic Park and Garden and the grade II\* listed Folly.

Site HS25

Historic England has previously advised that this site is opposite the grade II listed Osbourne House (a nineteenth century villa) and the construction of 35 dwellings





could have implications for the setting of the listed building. However if the existing hedgerow is retained and reinforced as appropriate, it should be possible for this site to come forward without resulting in harm. We therefore welcome bullet point seven of Table 16 where there is a requirement to retain and enhance the landscape buffer along Hawkshead Road to mitigate the impact of development on the grade II listed Osbourne House.

### **Section 23: Cuffley**

Sites HS26, HS27, HS28, HS29, HS30 and HS31

Historic England is satisfied that development/redevelopment of these sites for residential use would not directly adversely impact on any designated heritage assets and we do not wish to comment in detail on them. We do note however that there is an Area of Archaeological Interest adjacent to sites HS28, HS29 and HS30 and so would highlight the need for careful consideration of archaeological matters given the potential in this area. Ideally this should be referred to in Table 17.

### **Section 24: New Village at Symondshyde and Section 25 Rural Areas Policy SADM35**

Policy SP24 allocates land for a new village north west of Hatfield to accommodate approximately 1,130 dwellings over the Plan period. The site is detached from the main built up area of Hatfield. The site surrounds Symondshyde Farmhouse, grade II listed. Brocket Park Registered Park and Garden (grade II listed) and its associated listed buildings lies to the north east of the site. The allocation also includes land designated as an Area of Archaeological interest. Historic England has some concerns about this allocation given the potential adverse impact upon the setting of Symondshyde Farm and wider impact upon the setting of Brocket Park and listed buildings, as well as the Area of Archaeological Interest. The site is currently rural in nature, being approached through heavily wooded landscape along narrow country lanes. The site is also Green Belt. Development in this location would substantially alter the landscape and have a significant impact upon the setting of the listed building at Symondshyde Farmhouse and nearby Brocket Hall. The Sustainability Appraisal states that 'Overall, this site has the potential for a significant negative effect of the setting of heritage assets.'

Whilst we acknowledge that mention is made of the need to protect and enhance heritage assets, in particular the setting of Symondshyde Farmhouse, in the policy no mention is made of Brocket Hall. This historic asset should be included in the policy.

In addition, no mention is made of the Area of Archaeological Interest in the policy or supporting text. Given this designation it would be appropriate for the policy to make reference to this and the need for appropriate archaeological assessment to be





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undertaken in order to inform the masterplanning process and any mitigation measures required.

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 and structures in Lemsford and the registered park and garden at Brocket Park and associated listed buildings. Such consideration should inform whether the site should be allocated and, if it were to be, the number of houses proposed and any traffic mitigation measures required.

Development of this site would represent a major change to the landscape, but could present an alternative approach towards meeting the borough's housing need if various issues and constraints outlined above can be satisfactorily addressed.

### Sites HS33

Historic England is satisfied that development of this site would not directly adversely impact on any designated heritage assets and we do not wish to comment in detail.

### HS34

This site is located at some distance from historic assets and therefore we do not wish to comment in detail upon the site allocation.

## **Sustainability Appraisal**

We have commented on the SA in relation to a number of site specific comments.

## **Infrastructure Delivery Plan**

We have not been able to consider this document in any detail, but hope that issues and opportunities relating to the historic environment have been taken into account.

Finally, we should like to stress that this opinion is based on the information provided by the Council in its consultation. To avoid any doubt, this does not affect our obligation to provide further advice and, potentially, object to specific proposals, which may subsequently arise where we consider that these would have an adverse effect upon the historic environment.

If you have any questions with regards to the comments made then please do get back to me. In the meantime we look forward to continuing to work with you and your colleagues.



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Yours sincerely,



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