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Alex Howard
Senior Planning Officer
Development Management
North Herts Council

BY EMAIL ONLY

Our ref: SW/9758

18th October 2024

Dear Alex,

Planning application ref: 24/01444/FP
Land north of Ashwell Street and south of Lucas Lane between Huntsridge and East Lodge, 22 Lucas Lane, Ashwell

As the author of the Heritage Statement submitted with the above application, I have been instructed by Manor Oak Homes to provide a response to the 'Building Conservation Comments' (dated 27/08/24) provided by the Council's Conservation Officer in response to consultation on the application.

For ease of reference, I have responded to the various points raised in a tabulated format, taking each of the comments in turn.

Building Conservation comments	Response
<u>Paras 2.3 & 2.6:</u> The Officer states that he did not initially comment on pre-app	Unfortunately, the Conservation Officer's comments were not forwarded to the applicant.

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24/00189/PRE as he had assumed the Case Officer's feedback to the pre-app would be along the same lines of the refusal to application ref: 22/03094/FP. He states that he subsequently placed comments on file. The Officer states his disagreement with the Case Officer's opinion that positive amendments had been made to the scheme in terms of layout and appearance and that he is unconvinced by the farmhouse/ancillary buildings approach. He notes his 'in principle' objection to any development of the site.	Based on the generally positive response to the pre-app provided by the Case Officer, following encouragement by Officers to adopt a farmstead typology for the scheme, the applicant subsequently submitted an application.
<u>Paras 2.7 & 2.9:</u> Despite his 'in principle' objection, the Officer states (2.7) that he would have anticipated a reduction in the number of units from 14 <i>'if moving towards an 'improved' scheme.'</i> At 2.9 there is a further implication that a reduction in numbers of dwellings would be seen as more positive.	The principle of residential development of the site has been accepted. While the Conservation Officer has stated an 'in principle' objection to its development on heritage grounds, these comments make it unclear whether this is an 'in principle' objection or whether a scheme that had a further reduction in the number of dwellings may potentially be acceptable. However, at para 2.5 the Officer states that the principal reason for refusing the previous 14-dwelling scheme (22/03094/FP was about the contribution of the site to the conservation area, <i>'rather than having any concerns with the design and layout of the proposal.'</i>
<u>Paras 3.5-3.7:</u> 3.5: the Officer is of the view that the site's existence as a remnant of a formerly more extensive field system increases rather than decreases its significance and provides a good reason to preserve it as existing. In the same context (3.7), the Officer quotes Historic England's view that <i>'developing this land will (as stated before) reduce the contribution the plot makes to the significance of the conservation area and so result in harm to that significance.'</i>	My own view on this is stated at para 3.2.4 of the Heritage Statement), i.e. that the site is no longer part of a legible and meaningful 'whole' in this respect, but has lost this context due to housing development on the surrounding fields, which has diminished its historic significance in this respect. I concluded that the site retains only a limited degree of intrinsic interest as open land in this context. The quotation from Historic England's consultation response does not refer specifically to this question of the site's origins, but is made in reference to HE's opinion that the site, as open land, allows open views across to the wider landscape, which is the aspect of the site that has been formally recognised in both Conservation

	Area Character Appraisals and the Neighbourhood Plan as being of value. I would also note that the format of the 5th bullet point under 'Historic Significance' on p.10 of the Conservation Officer's comments does not differentiate between what is a direct quote from the Heritage Statement and what is the Conservation Officer's own opinion. The first reference is a direct quote from the Heritage Statement (but is not in quotation marks) while the second and third references present the Officer's own opinion (which disagrees with mine), despite referencing paragraph numbers from the Heritage Statement against them. This is misleading and suggests the Heritage Statement takes the same view as the Officer in this respect.
<u>Para 3.9:</u> The Officer states, <i>'Whilst acknowledging the layered qualities of the view, the application site has a more positive role than just this. It is not just about the proposed development's impact upon Key View 23 (KV23) in the ACS but rather about the overall contribution that this field makes to the character and appearance of the Ashwell Conservation Area.'</i>	None of the formal descriptions of the identified view (KV23) and why it is valued, in either of the two Character Appraisal documents or the Neighbourhood Plan (NP), refer to any intrinsic quality of the site itself, but refer to the longer-distance view it facilitates from a fixed position at the field gate.
<u>Paras 3.10-3.12:</u> 3.10 states, <i>'Whilst it is agreed that KV23 does not look over the historic core of Ashwell it does represent an important and significant opportunity to not only experience this part of ACA but to also visualise the character of other parts of Ashwell directly to the north of the Ashwell Street before other developments took place.'</i> 3.12 states, <i>'Even though this may be regarded as a lesser view when compared with the point made at 3.2.24 it is nonetheless a Key View worthy of preserving. Even this lesser view makes an important contribution to the character of the area.'</i>	The meaning of 3.10 is not fully clear. We cannot speculate on what a person might visualise or imagine when looking at this view, in addition to seeing what is actually visible. At 3.12, the Officer accepts that this is a 'lesser view'. It follows therefore that it makes a lesser contribution. I do not dispute that a long-distance view is offered across the eastern edge of the settlement. My contention is that it is not a view of high significance in relation to the conservation area, particularly when compared with views that encompass the historic core of the settlement. This lower degree of significance is then factored into my conclusions on the degree of harm arising to the conservation area from the application proposals, also considering that what is of value about the view is, to a large extent, preserved by the proposals. These retain a

	large area of green open space in the foreground and the long-distance view will remain appreciable above and beyond the proposed development.
Para 3.13: The Officer quotes para 3.2.26 of the Heritage Statement, which says, <i>'I would therefore consider KV23 to make a low to moderate contribution to the character and appearance of the conservation area. The greatest value of the conservation area, and the reason for its designation, lies in the interest of the historic built environment of its core. KV23 reveals something of its wider physical setting in the landscape.'</i> The Officer contends that this judgement <i>'appears to infer that the consultant considers that there is indeed more to this site beyond an appreciation of the wider physical setting in the landscape.'</i>	No such thing was implied and no such thing should be inferred. I clearly state what leads to my view. At 3.2.33 the Heritage Statement says, <i>'In summary, I am of the opinion that the contribution of the site to the character and appearance of the conservation area, as that is described and understood in the CACS, is low to moderate, and derives chiefly from the ability to appreciate the wider setting of the village (albeit a later edge of the village) in KV23.'</i>
Paras 3.14-3.15: The Officer notes that the Heritage Statement acknowledges that the site feeds into the semi-rural character of the western part of Ashwell Street but that the latter is not dependent on the application site for that quality. The Officer states that, <i>'Whilst the character of Ashwell Street does not wholly rely on the application site for its semi-rural character it goes some way in reinforcing this character. The development of the application site would denude this part of ACA of part of its special character.'</i>	The Heritage Statement also notes that the site, and the view KV23, are at the western end of the lane immediately adjoining late 20th-century development, and that east of the site is further 19th- and early 21st-century development. It is the southern side of the lane that borders agricultural land, which contributes most to the semi-rural character. The Officer acknowledges that the proposals move development further north into the site away from Ashwell Street, <i>'which would reduce the impact of built form on the character and appearance of this historic thoroughfare,'</i> and describes this as a <i>'positive intervention creating an open area at the top (southern end) of the site.'</i> Despite this acknowledgement, the Officer also states the contrary view that the proposals will <i>'denude'</i> this part of the conservation area (Ashwell Street) of part of its special character. In my opinion, this is very much an overstatement of the case. This section of the lane will retain its existing qualities of partly built-up and partly semi-rural, with trees (including replacement tree planting) retained along the southern

	boundary of the site, the tunnel-like effect of the trees maintained in views east along the lane, and fields extending to the south.
<u>Para 3.19:</u> The Officer disagrees that Plots 1 and 2 represent high quality design and that the design has a relationship with the agricultural-style character of the other proposed dwellings.	The expressed relationship is that Plots 1 and 2 represent the 'farmhouse' and the other dwellings the agricultural-style typologies. This concept was encouraged by Council Officers (including the Development and Conservation manager) during pre-application discussions as being appropriate for this site, because of its edge-of-settlement nature, based on precedents Officers provided of other successful schemes which took a similar approach.
<u>Para 3.20:</u> I note the artist's impression (by AT Architecture) prepared to illustrate how the Plots 1 and 2 dwellings will appear in view KV23 and as also illustrated in the wireframe (Viewpoint 1, LVIA). Both images clearly illustrate the impact of the development, particularly Plots 1 and 2. Although the topography of the site and distant views over the top and to the side of Plots 1 and 2 will still be evident, the site's rural character will be significantly denuded.	As the Officer notes, the topography of the site and distant views will remain available, as illustrated. No reference is made to the significant area of open space retained in the foreground of the view. Any development of a previously undeveloped site of course changes its character. The assessment is whether that change is harmful to heritage assets. My conclusion was a low degree of less than substantial harm in reference to the change to the framing of the view identified as KV23.
<u>Para 3.23:</u> The Officer acknowledges that the western end of this part of Ashwell Street is different in appearance to the eastern end, and that the highway improvements have been designed to minimise their impact, but maintains a view that the vehicular access would significantly change/harm the character and appearance of the Ashwell Conservation Area; that the removal of trees from the southern boundary would weaken the positive contribution made by the 'green tunnel'; and that the formation of the vehicular access will more fully reveal the proposed housing on the site.	I note that the Officer does not appear to have taken into account the mitigatory effects of the proposed replacement tree planting along the southern boundary of the site and the orchard planting that is proposed between the southern boundary and the proposed dwellings, which would further mitigate and soften the appearance of the development.
<u>Bullet point 6 under Historic Significance (p.10):</u> The Officer states, '<i>Significance is derived from the site probably being a site of paired furlongs (double-width)</i> –	The ability to appreciate the site as paired medieval furlongs is no longer apparent. There is no surviving ridge and furrow on the site and surrounding development of other such fields has removed any

<i>a survival of medieval strip farming from which views are afforded towards the Parish Church of St Mary the Virgin. Although the 'layered' view from the field gate entrance does not focus on the historic centre of the village, it does include a view towards (albeit not readily discernible) of Ashwell Springs and several properties at the head of Springhead.'</i>	contextual evidence. The ability to see the spire of St May's Church from here is purely incidental and any relationship of period is no longer readily appreciable. There is also no view of St Mary's Church from the field gate. The church is only visible from within the site and the proposal has been laid out to make views towards the church in the historic core possible, which will enhance the viewing experience of the conservation area. The comment about the site including a view towards Ashwell Springs is, in my view, rather spurious. One can look in any direction from the site and the view will be towards something, but if one is unable to see that thing then it cannot be said to be a meaningful view of it. There is no designed, meaningful, functional or otherwise positive link between the site and Ashwell Springs, which is not visible from the site, and no link with the properties at the head of Springhead.
<u>Bullet points 3-5 under More Recent Significance (p.11):</u> These all refer to the identified viewpoints in the two Character Appraisals and the NP (all effectively a single viewpoint taken from the field gate).	As referred to above, the descriptions for these viewpoints, in both Character Appraisals and the NP, all describe the importance of the viewpoint as consisting in its facilitation of a longer-distance view, and not to any intrinsic heritage value of the site itself.
<u>Para 4.2:</u> The Officer states that, in his view, <i>'the 'harm bar' is set higher than what the applicant has indicated which is, in my view, reinforced by Historic England's comments.'</i>	This relates to the difference of opinion on the level of harm perceived to arise to the conservation area from the proposals. My own view is that there is less than substantial harm at the lower end of the spectrum of such harm. Historic England, in their consultation response on the application, take the view that the proposals would cause less than substantial harm to the significance of the conservation area, but do not specify the degree of such harm. The response continues, <i>'Paragraph 202 requires the Council to consider any public benefit which might be delivered by the proposals and weigh this against the harmful impact. We would accept that the development of the proposed housing could be such a public benefit and leave this matter to the Council</i>

	<i>but would object to the application on heritage grounds.'</i>
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I hope the above is helpful in your determination of the application.

Yours sincerely,



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Director, Asset Heritage Consulting Ltd
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