



Historic England

WEST MIDLANDS OFFICE

Miss Kelly Gibbons
Herefordshire Council
PO Box 230 Blueschool House
Blueschool Street
Hereford
Herefordshire
HR1 2ZB

Direct Dial: 0121 625 6820

Our ref: P00460093

Dear Miss Gibbons

**Arrangements for Handling Heritage Applications Direction 2015 &
T&CP (Development Management Procedure) (England) Order 2015**

**EXISTING ROUNDABOUT JUNCTION OF A49(T) AND B4399 TO A NEW
ROUNDABOUT WITH THE A465 THEN JOINING THE B4399, SOUTH-WEST OF
HEREFORD, HEREFORDSHIRE
Application No 151314**

Thank you for your letter of 19 May 2015 notifying Historic England of the above application. Following our initial response to this application of 4th June 2015, and our subsequent letter of 18th June 2015, we have received additional information regarding the application, we are now responding more fully.

Summary

The planning application is for a new road, about 4.2 km in length, south of Hereford, linking the A49 with the A465. Historic England has no objection to the principle of a Southern Link Road, but has some concerns about the selected route, SC2, that is the subject of this application. Part of the road would be on an embankment about 330 metres in front of Haywood Lodge, a Grade II* listed house, Heritage List for England unique identifier ref: 1296921. Haywood Lodge is likely to be the site of a Lodge serving a royal hunting estate that was rebuilt to serve a gentry estate in the early 18th century and further adapted in the 1860s.

Historic England Advice

The Significance of Haywood lodge.

Haywood Lodge is a Queen Anne house dating largely from the early 18th century, listed Grade II*. The current house appears to have been built on the site of an earlier Lodge relating to Haywood Forest. The prominent location with panoramic views, the survival of earlier foundations and other earlier elements within the present structure, and the lack of alternative locations for the documented earlier Lodge site, all indicate



THE AXIS 10 HOLLIDAY STREET BIRMINGHAM B1 1TG

Telephone 0121 625 6870
HistoricEngland.org.uk



Historic England is subject to the Freedom of Information Act 2000 (FOIA) and Environmental Information Regulations 2004 (EIR). All information held by the organisation will be accessible in response to an information request, unless one of the exemptions in the FOIA or EIR applies.



that the current house occupies a more ancient site. A Lodge is recorded from the 16th century relating to Haywood Forest, an area subject to Forest Law, and managed as a private estate on behalf of the Crown. In 1570 Queen Elizabeth I leased 915 acres within the Forest to her Nephew, 'within the bounds and precincts of the ancient Forest of Hay'. Haywood Forest is shown on maps of the area e.g. Saxton's of 1557 and Jon Bleau's map of Hereford 1648. The Lodge is also shown on later sources including Buck's 1732 etching of 'Prospect of Hereford', and Isaac Taylor's map of Central Herefordshire 1754. Although the Forest was not necessarily heavily forested throughout the past, there are a number of mature old oak trees close to Haywood Lodge and in the wider area, a wooded prominence at Beech Grove, and other areas of fenced woodland, all of which are remnants of once more wooded landscape.

The setting of Heywood Lodge is the environment in which it is experienced, and there is a relationship between it and the wider landscape which explains its former social and economic function, and context over centuries. The relationship with the wider landscape is maintained in views from the house that are extensive in all directions. The principal view from the front of the house retains a particular landscape context looking directly through part of the historical Forest area towards Hereford and the Cathedral tower. This view was one of a series (now housed at Tate Britain) of Haywood Lodge painted by George Lewis in 1815, and this view can be experienced in the present day.

The consultant's assessment of significance does not fully document the association of Haywood Lodge with the landscape around it. In terms of setting, the consultants have included some research (mainly map regression) into the history of the landscape, but not sufficient to describe its development over time.

The route selection.

A number of route options have been considered. In our consultation response of October 2014 regarding the four short-listed routes, and in subsequent correspondence, Historic England has raised concerns about the assessment process undertaken to determine the preferred route.

The Southern Core Corridor Assessment commissioned in 2012 identifies routes SC5 and SC6 as the preferred options in terms of heritage appraisal alone. The Preferred Option Report of 2014, discounts four routes, including SC6, due to, in summary, 'direct impact on Ancient Woodland'. The four remaining routes, including SC5, were assessed and ascribed the same level of impact for the historic environment (-1.5).

It is therefore unclear to us how the lesser impact upon heritage of SC5 and SC6 identified in 2012 was considered within the route selection process thereafter. It also appears that the historic environment has been afforded less weight than natural environment designations and we are unclear as to the justification for this within the



THE AXIS 10 HOLLIDAY STREET BIRMINGHAM B1 1TG

Telephone 0121 625 6870
HistoricEngland.org.uk





NPPF.

Historic England therefore has concerns that the evidence base and assessment that has informed the route selection process, and the relative weight afforded to the historic environment, is robust enough to allow demonstrable compliance with the NPPF section 12.

Impact and Mitigation

The favoured route, SC2, in the area of Haywood Lodge will be upon a raised embankment about 480 metres long, and about 3.4 metres above ground level where it passes about 330 metres in front of Haywood Lodge. This will have an impact upon the ability to understand and explain the interrelationship between the house and landscape, especially regarding the medieval Haywood Forest, and the development by the 18th century of a gentry estate. In terms of this identified significance, the greatest impact is likely to be upon a key view from the Lodge towards Hereford Cathedral that is not much altered from George Lewis's painting of 1815.

Harm to the historic environment is identified within the Cultural Heritage Desk Based Assessment and Environmental Statement supporting the application. Harm mainly relates to noise, lighting from vehicles, and impact upon the setting of Haywood Lodge, through development within its setting.

In terms of the NPPF definitions of harm, the consultants, Parsons Brinkerhoff, equated this harm with 'less than substantial harm' at a meeting of 24th September 2015. In this context 'Substantial harm' is rare, usually relating to some direct physical loss of designated heritage assets, which we agree does not apply in this case. This is not-to-say, however, that the level of harm is not significant.

The harm is assessed by the consultants, e.g. within the Heritage Desk Based Assessment, Table 17, November 2014, and the Environmental Statement of April 2015, as a 'moderate - large adverse' impact upon Haywood Lodge. The Environmental Statement of April 2015, para. 6.6.10, assesses the magnitude of impact on the setting of Haywood Lodge as 'significant' and that noise and visual impact will be permanent residual effects which will have 'an appreciable change in the ability to understand and appreciate the Listed Building and its Setting'.

Proposed mitigation includes lowering of the gradient of the proposed embankment and some planting. We disagree with the consultants view that that there is no further scope to mitigate the impact of the road on the historic environment. A more detailed understanding of the historic landscape could inform improved planting into the landscape to mitigate the visual impact to some degree. At the same time careful attention to the design of the road could help to mitigate it through measures to ensure that the light from vehicles, and noise levels, are kept to a minimum. The detailed



THE AXIS 10 HOLLIDAY STREET BIRMINGHAM B1 1TG

Telephone 0121 625 6870
HistoricEngland.org.uk





Historic England

WEST MIDLANDS OFFICE

design of the road as it passes over the embankment, as well the design of bridges will benefit from more work to lessen impact. We also reiterate that we are not convinced that the evidence base informing the route selection has benefitted from a thorough historic environment assessment.

National Policy.

We consider that in this case the NPPF para. 134 is the relevant paragraph that the local authority should consider in its weighing of harm against public benefit. The conservation of the heritage assets in a manner appropriate to their significance is one of the Government's 12 core planning principles, (NPPF para. 17). Local authorities should therefore identify and assess the significance of heritage assets that may be affected by proposals and take this assessment into account when considering the impact of a proposal on a heritage asset (NPPF 129). When considering impact, Herefordshire Council is required to give 'great weight' to the conservation of Haywood Lodge, one of very few houses of this quality and importance in Herefordshire. Any harm or loss should require clear and convincing justification (NPPF132).

Recommendation

The application should be refused or deferred to allow further consideration of the most appropriate route, and mitigation measures to minimise harm to the historic environment.

Yours sincerely



Bill Klemperer

Principal Inspector of Ancient Monuments

E-mail: bill.klemperer@HistoricEngland.org.uk

cc



THE AXIS 10 HOLLIDAY STREET BIRMINGHAM B1 1TG

Telephone 0121 625 6870
HistoricEngland.org.uk

