



**Examination of the North Hertfordshire Local Plan 2011 - 2031**  
**Matter 25 – new land proposed for allocation through the main**  
**modifications**

**Historic England, Hearing Statement**  
**February 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.



early/mid C19 (probably after 1840). Lodges by their nature are designed to be prominent within the street scape as they announce the presence of a manor house or important building. St Ibbs Lodge is currently sat within a traditional open setting, and is still the most visually prominent building within the landscape. We are concerned that the increase in size of SI1 could result in harm to the grade II Listed Building through a change in the character of its setting unless properly mitigated.

Constructed in the early C19 to store ice presumably from the lake in the park to the east, the double ice house consists of two icehouses with a single entrance, each comprising a conical brick lined well covered by a brick dome. The previous iteration of SI1 meant that although the allocation ran adjacent to the structure on one side, it retained an element of its original open setting. The proposal to extend Site SI1 north-eastwards will mean that this Listed Building now falls within the allocation, surrounded on three sides. In common with St Ibbs Lodge, it is considered that this change in setting could result in harm to the Listed Building unless properly mitigated.

Given the potential historic environment impacts set out above, we would expect Policy SI1 to be amended to make explicit reference to the Listed Buildings, and to require the preparation of a heritage impact assessment (HIA) prior to the determination of any planning application for the site. The revised policy wording should make it clear that the HIA will be expected to inform the design and layout of SI1 so that every effort is made to avoid harm to these designated heritage assets through the design and layout of the site and, where this is not possible, mitigation measures are put in place. We suggest the following wording:

*Development should conserve and enhance designated heritage assets, including the Grade II Listed St Ibbs Lodge, and Double ice through careful design and layout, and appropriate mitigation as informed by the preparation of a Heritage Impact Assessment.*