



# Planning, Heritage, Design & Access Statement

THE COMET HOTEL, ST ALBANS ROAD WEST, HATFIELD

COMET HOTEL

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# 1. Introduction

## Background

- 1.1 Pearce Planning Ltd have been appointed by the Comet Hotel to provide planning consultancy services in connection with the current advert proposals – relocation of the existing 'The Comet Hotel' sign to first floor level and the installation of a new 'Element Bar & Kitchen' sign at ground floor level (both on the on the curved extrusions of the building).
- 1.2 The amended/new signage is required on the basis of the following operator objectives:
  - The Comet and Element Bar & Restaurant have their own separate brands, identities and client base;
  - The Comet sign is actually over the restaurant, not the hotel and therefore should be relocated to suit;
  - The existing Element sign (on the north west elevation) has little visibility from the roadside in guiding guests in and promoting awareness of Element;
  - Previous efforts to promote Element at the front of the building by way of temporary banners etc have been restricted by the Council; and
  - Not being able to self-promote/advertise the fact Element exists to passing trade has and is having a huge impact on the business. There is a real prospect that if business levels do not considerably increase on pre-pandemic levels, the business may not survive or will have to be changed significantly, which will undoubtedly have an impact on the employment of many local team members.



## 2. Site & Surroundings

### Site Location

- 2.1 The Comet Hotel is located on the outskirts of Hatfield and is surrounded by a variety of uses. To the north is Hatfield Business Park, north west is University of Hertfordshire - de Havilland Campus, north east is The Galleria (designer outlet centre), east is Hatfield Lawn Tennis Club and Hatfield football association and to the south west are a number of residential properties.
- 2.2 The site is sustainably located west of the A1001 (also known as Comet Way); just off the A1. Whilst located centrally in Hatfield, the site also benefits from direct access to St Albans (via A1057) and to Welwyn Garden City (A1 and A6129).
- 2.3 Access into the site is via Comet Way A1001 or the A1057. The roundabout east to the site provides an overpass across the A1.
- 2.4 The application site has functioned as a restaurant and hotel since its initial construction, with student accommodation more recently constructed on the western part of the site.



### 3. Proposals – Design & Access

3.1 The Description of Development for the proposed application is as follows:

**Installation of new signage on front elevation and relocation of existing signage from ground floor to first floor level.**

3.2 As stated at Section 1, the applicant's rationale for the signage proposals is as follows:

- The Comet Hotel and Element Bar & Restaurant have their own separate brands, identities and client base;
- The Comet sign is actually over the restaurant, not the hotel and therefore should be relocated to suit;
- The existing Element sign (on the north west elevation) has little visibility from the roadside in guiding guests in and promoting awareness of Element;
- Previous efforts to promote Element at the front of the building by way of temporary banners etc have been restricted by the Council; and
- Not being able to self-promote/advertise the fact Element exists to passing trade has and is having a huge impact on the business. There is a real prospect that if business levels do not considerably increase on pre-pandemic levels, the business may not survive or will have to be changed significantly, which will undoubtedly have an impact on the employment of many local team members.

3.3 The existing 'The Comet Hotel' signage would be removed from the ground floor level and reinstalled at first floor level, on the on the curved extrusions of the building.

3.4 The proposed 'Element Bar & Kitchen' signage would be designed to match the existing 'The Comet Hotel' signage and would be installed in a similar location at ground floor level (also on the curved extrusions of the building). The specification is as follows:

*Built up PPC stainless steel lettering with open stroke, to have internal face illuminated lettering to the same profile. Internal letters to have white opal acrylic faces and internal premium white GE LEDs to create even face illumination.*

3.5 Reviewing the Heritage Statement produced to support the recent substantial conversion works at the site, it is evident that the front elevation signage has varied over time, as per **Figures 1 and 2** overleaf. The current application proposals are thus considered to simply comprise a further alteration to the building's signage, which has been amended to suit the various occupiers over time.



**Figure 1 – Front elevation, 1930's (Note - Benskins Brewery Ltd was the original occupier)**



**Figure 2 – Front elevation, prior to conversion/redevelopment works. Note 'The Comet' signage at first floor level.**



## 4. Planning History

- 4.1 Following approval of applications ref: 6/2016/1739/MAJ & 6/2016/1740/LB, substantial redevelopment was undertaken. The proposals permitted refurbishment of the existing building, a replacement hotel extension and student accommodation on the western part of the site.
- 4.2 Further to the permission a subsequent set of applications were submitted to request permission for a series of advertisements and signs. These too were permitted, with the exception of 6/2019/3244/ADV and 6/2019/3245/LB, which were eventually allowed at appeal.
- 4.3 All relevant applications have been detailed below:

**Application Ref: 6/2019/3244/ADV & 6/2019/3245/LB**

- 4.4 In 2019 an application was submitted for the following proposal

*Installation of 2x Illuminated signage (2 no. locations)*

Allowed at appeal 25/11/2020

**Application Ref: 6/2019/0953/ADV & 6/2019/0957/LB**

- 4.5 In 2019 an application was submitted for the following proposal:

*Various Signage display:*

*Signs 1 & 2: 2 no. Halo illuminated Fusion Students logo on student accommodation (sign type 1); Signs 3-6: 4 no. Student block identification lettering on student accommodation (non-illuminated) (sign type 2A); Signs 7-12: 6 no. Student block identification halo illuminated lettering on student accommodation (sign type 2B); Sign 13: 1 no. Hotel entrance sign on Comet Hotel (sign type 3); Sign 14: 8 no. Student accommodation glazing manifestation on student accommodation (sign type 4b); Sign 15: 1 no. South east elevation Comet Hotel identification signage on Comet Hotel (sign type 6); Sign 16: 1 no. Restaurant identification sign on Comet Hotel (sign type 5); Sign 17: 2 no. Comet Hotel entrance totem signs (sign type 8); and Sign 18: 1 no. North east elevation Comet Hotel identification signage on Comet Hotel (sign type 7).*

Approved 06/08/2019 & 15/07/2019

**Application Ref: 6/2017/2746/LB**

- 4.6 This application was submitted to bring the proposals in line with the detailed design of the development (further to the below consents).

*Extension and refurbishment of the Grade II listed building (Use Class C1) following demolition of existing rear and side extensions. Erection of student accommodation (Sui Generis) with landscaping and associated works.*

**Application Ref: 6/2016/1739/MAJ & 6/2016/1740/LB**

- 4.7 In 2016 approval was granted for the following development:

*Extension and refurbishment of the grade II Listed building (Use Class c1) following demolition of existing rear and side extensions. Erection of 7,253.7sqm student accommodation (sui generis), landscaping and associated works*



## 5. Planning Policy

### Policy Context

- 5.1 Section 38 (6) of the Planning & Compulsory Purchase Act 2014 requires planning decisions to be made in accordance with the Development Plan unless material considerations indicate otherwise. This is also reflected by paragraph 47 of the new National Planning Policy Framework (NPPF) 2021.
- 5.2 The Development Plan includes adopted local plans, neighbourhood plans that have been made and published spatial development strategies, together with any regional strategy policies that remain in force. Neighbourhood plans that have been approved at referendum are also part of the development plan, unless the local planning authority decides that the neighbourhood plan should not be made.
- 5.3 The weight to be applied to the Local Development Plan will depend on its conformity with the NPPF. The degree of importance placed on emerging local policy will depend on how far it has advanced through the process of adoption, the level of objections raised and conformity to the NPPF.
- 5.4 In Welwyn Hatfield Borough Council, the Development Plan comprises the following:
  - Welwyn Hatfield District Plan, 2005
  - Draft Local Plan

### Welwyn Hatfield District Plan, 2005

- 5.5 The Welwyn Hatfield District Plan is the current adopted Local Plan and provides a framework for planning decisions in the borough. The Welwyn Hatfield District Plan was adopted in 2005. A number of policies have been 'saved' until it is replaced by a Local Development Framework.

#### *Policy D1 (Quality of Design)*

- 5.6 Applications are expected to incorporate high quality into the design of the proposals.

#### *Policy D2 (Character and Context)*

- 5.7 Proposals are expected to be of good design and respect the local character and context of the area.

### Material Considerations

- 5.8 Material considerations in the determination of any planning application on the site would include national guidance in the NPPF and Planning Practice Guidance (PPG), emerging Local Plan documents and any supporting supplementary planning documents.

### NPPF

- 5.9 The NPPF 2021 provides national policy to help guide local plan makers and decision takers in the approach Central Government is taking to development proposals. The NPPF replaces the previous versions and the original 2012 document and promotes sustainable development through achieving social, economic and environmental objectives.





- 5.10 Paragraph 11 provides a presumption in favour of sustainable development for plan making and decision taking. 11c requires decision makers to approve development proposals that accord with up-to-date Development Plans without delay.
- 5.11 Chapter 4 refers to Decision making and requires planning authorities to approach decisions in a positive and creative way. Paragraph 47 restates planning law which requires development proposals to be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 5.12 The NPPF attaches significant weight to proposals that would support economic growth and productivity, on both a local level and in consideration of wider needs (Para 81).
- 5.13 Para 194 states that in determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.
- 5.14 Para 199 states that, when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance. Para 202 then goes on to state that, where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

#### **Planning Practice Guidance (PPG)**

- 5.15 "What assessment of the impact of proposals on the significance of affected heritage assets should be included in an application?"

*"Applicants are expected to describe in their application the significance of any heritage assets affected, including any contribution made by their setting (National Planning Policy Framework paragraph 189). In doing so, applicants should include analysis of the significance of the asset and its setting, and, where relevant, how this has informed the development of the proposals. The level of detail should be proportionate to the asset's importance and no more than is sufficient to understand the potential impact of the proposal on its significance."*

#### **Welwyn Hatfield Borough Council (Draft Local Plan)**

- 5.16 The Welwyn Hatfield Borough Council Draft Local Plan (the Draft Local Plan) was published in 2017 and was submitted for examination in May. Following on-going Examination, Stage 9 Hearing Sessions were held most recently during February and March 2021. Therefore, it is considered to attract some weight as a material consideration. Relevant policies include:

*Policy SP9 - High Quality Design*

- 5.17 The policy requires proposals to respond to character and context and relate well to their surroundings.



*Policy SADM 6 - Shopfronts, Advertisements and Signage*

- 5.18 The Council will require all proposals for advertisements, signs, new and altered shopfronts, canopies, blinds, shutters and other security measures to be of a high standard of design and incorporate the design principles and policies in the Plan and the Council's Supplementary Design Guidance. Where located within Welwyn Garden City Town Centre, proposals will also be required to incorporate design principles within the Welwyn Garden City Guide to Shopfront and Advertising Design.

*Policy SADM 15 - Heritage*

- 5.19 Proposals should seek to sustain and enhance the heritage assets in a manner appropriate to its function, significance, character, setting, materials, form and scale.

**Welwyn Hatfield District Plan SDG (2005)**

- 5.20 This Supplementary Design Guidance requires all new development to be of high quality, and respect and relate to the character and context of the area in which it is proposed.



## 6. Planning Assessment

- 6.1 The above noted policies support additional development, provided it is high quality, of good design and respect the local character and context of the area.

### Design

- 6.2 The proposed relocation of the existing signage is considered to have a negligible impact from a planning perspective.
- 6.3 The proposed new signage will be designed to match the existing signage to be relocated, as per the materials identified in Section 3 above. The same font, lettering and proposed materials are proposed in order to ensure contextual conformity within the local area. As such, the design of the existing and proposed signage will be entirely consistent and thus there is no risk of the new signage have an incongruous appears in the context of the existing signage or the existing building.
- 6.4 The location proposed is considered to be the best position to attract customers and advertise the premises to passing customers. As noted in Section 3, the applicant is keen to bring trade back up closer to pre-pandemic levels, in order to better safeguard the on-going business and ensure continued employment of existing staff.
- 6.5 The works are also considered not to affect the presence of any feature of historic, architectural, cultural significance or similar interests.
- 6.6 As noted in Section 3 above and evidenced by **Figures 1 and 2**, the signage on the front elevation has changed over time and it is thus not considered that the proposed signage changes deviate in any substantive way from the previous signage changes.

### Highway Safety

- 6.7 The proposed adverts are located above the building and a significant distance from the public highway. For this reason, no public safety issues have been considered relevant to the proposals.
- 6.8 The illumination is not considered to be distracting for drivers or pedestrians
- 6.9 With respect to Listed Building considerations, these are covered in the following Section 7.
- 6.10 For all these reasons, the proposal therefore accords with the provisions of the development plan.



## 7. Heritage Assessment

### Listed Building

#### Description

- 7.1 The building is Grade II listed. The list description (See Appendix A) notes the following:

*Hotel. 1933. By E B Musman. Red brick with stone dressings on steel frame. The plan is supposedly in the form of an aeroplane. Two storeys. Projecting centrepiece with rounded end, the ground floor projects beyond the first. Wings on either side, also half round, single storey only. Five window side elevations. Largely original steel framed windows, the two modern ones in the front elevations are openings in originally blank walls. Clipsham stone dressings strip above and below windows and to parapets. Flat roofs not visible, the original roof lantern has been removed. The interior has been altered. A pioneer hotel in the modern style.*

- 7.2 The hotel is understood to have been built and first operated in the 1930's. The building was originally designed to provide a Hotel, to accommodate travellers opting to use motor transport; whilst also providing public house facilities as well.

### Assessing Significance

- 7.3 The significance of a heritage asset is defined in the NPPF as the value of a heritage asset to this and future generations because of its heritage interest. The assessment of significance within this report has been undertaken in accordance with the policies and guidance contained in Conservation Principles, Policies and Guidance (English Heritage, 2008). The significance of a heritage asset (termed 'place' within Conservation Principles) is defined with reference to four areas of value.

- **Evidential Value** is derived from "the potential of a place to yield evidence about past human activity" (English Heritage, 2008, p28) and primarily associated with physical remains or historic fabric. This is often associated with unique primary sources which do not need to be visible; evidential value is therefore generally equated with archaeology;
- **Historical Value** is derived from "the ways in which past people, events and aspects of life can be connected through a place to the present" (English Heritage, 2008, p28). This can derive from particular aspects of past ways of life. Illustrative historical value provides a direct (often visual) link between past and present people, while associative historical value provides an association with notable families, persons, events or movements.

- **Illustrative Value** - Conservation Principles states

*'An historic building that is one of many similar examples may provide little unique evidence about the past, although each illustrates the intentions of its creators equally well. However, their distribution, like that of planned landscapes, may be of considerable evidential value, as well as demonstrating, for instance, the distinctiveness of regions and aspects of their social organisation.'*

- **Associative Value** - This is less concerned with the asset physically, but more about what it can detail and illustrate to us about other key developments. Conservation Principles states:

*'Many buildings and landscapes are associated with the development of other aspects of cultural heritage, such as literature, art, music or film. Recognition of*



*such associative values tends in turn to inform people's responses to these places.'*

- Aesthetic Value is derived from sensory and intellectual stimulation and including design value, i.e. "aesthetic qualities generated by the conscious design of a building, structure or landscape as a whole" (English Heritage, 2008, p30). It may also include its physical form, and how it lies within its setting. It may be the result of design, or an unplanned outcome of a process of events (i.e. fortuitous). This can also extend to the craftsmanship of an artist's/artisan's workspace. In such cases 'Strong indicators of importance are quality of design and execution, and innovation, particularly if influential.' ; and
- Communal Value derives from the meanings that an historic asset has for the people who relate to it, or for whom it relates to their collective experience or memory. It may be commemorative or symbolic in nature, and relate to identity or collective memory (English Heritage, 2008, p31-32).
  - Commemorative Value – These values reflect the meanings of a place for those who draw part of their identity from it, or have emotional links to it. They are important aspects of collective memory and identity, places of remembrance whose meanings should not be forgotten.
  - Social Value - This is associated with places that people perceive as a source of identity, distinctiveness, social interaction and coherence. Some may be comparatively modest, acquiring communal significance through the passage of time as a result of a collective memory of stories linked to them.

## **Assessment of Significance**

### *Overview*

- 7.4 The proposed works intend to relocate one existing sign from ground floor to first floor level, and to install a new sign at ground floor level (on the curved extrusions of the building). For this reason this heritage statement/assessment is limited to assessing the significance of aesthetic and historical value.
- 7.5 Evidential value has not been considered, mainly as no physical alterations to the buildings original materials, layout or form are proposed.

### *Historical Value*

- 7.6 The key historical significance of the building is related to the architect and the expansion of road side services in a post war era. The architect, Ernest Brander Musman; who in his own right exemplified the 1920's, Art Deco, modernist architectural style. Other examples include the Nags Head, Bishops Stortford. The style is typified by strong straight lines, glass, steel frame and sweeping curved features; extruding from the main form of the building.
- 7.7 The Comet therefore provides a key example of modernist architecture. It is noted, however, that it is not a rarity amongst other national examples, but is considered to be one of Ernest Musman's designs; and one that has been well received. It is therefore considered to be of low-medium significance.



### *Aesthetic Value*

- 7.8 The buildings most notable features is its 1920's style and layout, formulating what appears to be, in an aerial perspective, the shape of a plane. Key to this is its symmetrical properties which gives a well-proportioned and balanced appearance.
- 7.9 Whilst there are no strikingly detailed features, in relation to aesthetical elements (e.g. entablature), the key features here are the simplistic approach to design; commonly associated with art deco. Strong lines and sweeping curves that accentuate and ensure the building stands out, particularly in its modern context. Whilst this is a significant feature it is not one that is considered to be of particular rarity or a leading example of such a modernist style. For this reason it is considered to provide low to medium significance.

### *Communal Value*

- 7.10 Not much communal value can be drawn from the building, primarily as the main purpose of the building was as a hotel, therefore would have been subject to a transient clientele. This, however, is not to say that the building would not provide memories for a very limited number of frequenting guests; or perhaps even local residents. For this reason the communal value of the building is considered to be of low significance.

### **Setting**

- 7.11 The building has been the subject of expansion and development over its lifetime. More notably so too has the surrounding context. The immediate setting of the building is dominated by car parking facilities and minor landscaping arrangements. This helps provide a clear view of the building from a close proximity perspective. Further away from the building the setting is drastically impacted. High capacity roads, traffic calming measures and modern buildings dominate the setting, which significantly detracts from The Comet. For this reason the overall setting of the heritage asset is considered to be of low significance.

## **Assessment of Impact**

### **Proposed works**

- 7.12 The proposed works comprise the relocation of the existing 'The Comet Hotel' sign to first floor level and the installation of a new 'Element Bar & Kitchen' sign at ground floor level (both on the on the curved extrusions of the building). In assessing the impact it is worth nothing that there is to be no alteration to the form, scale and or layout of the building as part of these proposals.

### **Impact**

- 7.13 The proposed works are minor in nature. They will be located on the ground and first floor to ensure they are visible to the public and create an active frontage; with the ultimate intention of attracting customers.
- 7.14 In assessing the impact, consideration as to the shape and form of the adverts is key. (I.e. curved). The existing and proposed signs are designed to be curved to ensure they does not protrude unnecessarily, and also to help accentuate the curvature of the location the signs are to be attached to. This would be considered to fit and be in keeping with the most notable and key feature of the building.
- 7.15 With regards to the proposed locations of the signage, each sign has been located in symmetrical positions. This again is considered to be in keeping with the heritage assets key design features. This is considered to support the architect's original design and also the modernist style.



- 7.16 The proposed wording “Element Bar and Kitchen”, in its most basic form, highlights the use of the building, or at least the particular service provided within this portion of the building. This service is the same service provided when the building was originally open and will still cater to a transient clientele. For this reason the specific of the wording is also considered to support the past use of the heritage asset and support its use.
- 7.17 The existing and proposed adverts are/will be brushed stainless steel illuminated. Clearly such materials would not have been used in the early 1930’s. However, the font used is exactly the same to that approved under a separate application, which detailed the majority of the signage around the site. This signage has been the subject of key consideration; in particular the font (Yu Gothic). This ties in with the wider “branding” of the site which has aimed to incorporate the style exhibited by the buildings era and final design (art deco). For this reason the continuity of the branding on the hotel is considered to preserve the heritage asset.
- 7.18 The first floor of the building will have a single sign, relocated from the ground floor, “THE COMET HOTEL”. This will be located on the first floor central to the buildings vertical centre point, ensuring its appearance relates to the symmetry of the building. Such design considerations have also been applied to this proposal. The signs are proposed to be aligned in a central position above the curved bay windows. A small portion of each sign will be visible on the front facing elevation (due to curvature), which is intended to attract potential customers round to either side to access the building.
- 7.19 The illuminated signs have also been positioned to support the symmetry of the building. By flanking each side of the main façade they support the original design narrative. The illumination would also emphasise the plane like shape by representing the navigation lights planes are required to use during flight under their wings. This pays homage to the designer’s original intent of the building.
- 7.20 The primary purpose of the illumination of the signs is to attract passing trade, especially in the evening. The illumination is therefore considered to support the buildings original use, promote its design intent and ensure that the building can be used to its fullest potential and improve investment in the local economy.
- 7.21 It should also be noted that the proposed works only require the lights to be fixed to the external wall. This means that should in the future the use change the works are reversible and can ensure the appearance of the heritage asset is preserved.

### **Summary**

- 7.22 In consideration of the above information the proposed works are not considered to impact the significant features of the heritage asset or its setting.



## 8. Balance and Conclusion

- 8.1 The application proposals comprise minor scale works which will help to improve the business viability of the current businesses occupying the premises.
- 8.2 The included Heritage Assessment assesses the impact of the proposed amended/new signage and concludes that there is no harm to the significance of the heritage asset or its setting. Furthermore, it is confirmed that the works are reversible and adding further credence that the works preserve the heritage asset.
- 8.3 It is considered that the application proposals are in accordance with the current Development Plan and that there are no material considerations that would lead to an alternative conclusion. It is also considered that the proposals are accordance with the aims and principles of the NPPF.
- 8.4 The benefits of the proposal should therefore be afforded significant weight and the Framework confirms that the development should be approved without delay.