



Mrs J Pagdin
Welwyn Hatfield Borough Council,
The Campus,
Welwyn Garden City,
Herts.
AL8 6AE.

19 November 2015

Dear Mrs Pagdin

Planning application reference: 6/2015/1998/LB

Site: Comet Hotel, St Albans Road West, Hatfield, AL10 9RH

Proposal: Extension and refurbishment of the Grade II listed hotel following demolition of existing extensions. Erection of student accommodation comprising of 361 beds, landscaping and associated works

Our ref: 15 11 12

Thank you for consulting the Twentieth Century Society on the above application. The Society considers The Comet in Hatfield to be one of the most important and significant of the 'Moderne' style pubs from the interwar era. Grade II listed, it was designed by E.B. Musman in 1936. Musman was a pioneer of radical pub design, and also responsible for the Nags Head at Bishops Stortford. These two pubs stand out as of particular interest, in an era where pub design was more likely to be of the 'Tudorbethan' roadhouse style favoured in the expanding suburbs. Revolutionary pubs are now extremely rare and all endeavours should be focussed on their preservation and survival for the enjoyment of future generations.

The Society commends the applicant's approach to the listed building in the intention to reinstate a number of features that have been lost from the original. The building is extremely well documented and as a result the like-for-like reinstatement of lost features seems achievable. Retention of the public dining use of the listed building is also to be commended as the best solution for the future of this heritage asset. The Society would like to urge the Council, however, to remind the applicant to use its best endeavours to retain as much of the original internal plan form of the listed building as possible, regardless of the later alterations: it is regrettable that the proposals include loss of internal walls that follow that plan form.

The Comet is a landmark building and, despite changes in the road layout since construction, remains a prominent local feature. Any proposals that detract from the dramatic appearance of this building, which was designed particularly with prominence from the road in mind, should be resisted. This prominence would be affected by any development within the setting of the listed building whether to the front or the rear. The Society agrees that in this case the additions of the 1960s and 70s certainly detract from the appearance of the listed building and do not have any heritage value in their own right. The previous development harmed this landmark aspect by adding an unsympathetic backdrop to the listed building. The removal of the 1970s hotel extension especially will benefit the listed building but extreme care must be taken in replacing this: particularly in relation to the massing, materials and proximity to the listed building. The setting of the listed building must be of the utmost importance in considering any new buildings within its scope.

The Council should be mindful of the guidance of the NPPF (March 2012), particularly paragraph 131 on the desirability of new development making a positive contribution and the warning in paragraph 132 over the harm to significance of development within the setting of a listed building. The full text is as follows:

131. In determining planning applications, local planning authorities should take account of:

- *the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;*
- *the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and*
- *the desirability of new development making a positive contribution to local character and distinctiveness.*

132. 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. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting.

The Society acknowledges that care has been taken to replace the later extensions and additional buildings on site with more subservient designs that respect the setting of the listed building, however, we remain concerned over the height of the proposed replacement buildings: both the hotel extension to the listed building itself and the proposed student accommodation. The Society would prefer to see the original footprint of the listed building reinstated, but considering that the principle of extending the building is established, would comment that any extension should be of a similar or lower height to the listed building. The proposed 2 storey link block is of an appropriate height in this regard but the Society considers that the 3 storey rear extension has the potential to be overpowering. The Society understands that attempts have been made to minimise the height of this extension since the original proposals, but considers it regrettable that despite these efforts the extension remains above the height of the listed building.

Similarly the height of the student accommodation is of concern, particularly where it will be visible to the proposed hotel extension to the north-west of the site. Again the Society would prefer not to see this quantity of development within the setting of the listed building, but understands that the principle is established by previous construction. We would re-iterate that any development on this

part of the site should be subservient to the listed building and would therefore like to register our concern that the height of the proposed building will harm the setting of the listed building by drawing the eye and attention away from the heritage asset.

I hope these comments are useful to you in your deliberations regarding this case, I would be extremely grateful if the Society could be informed of the Council's decision.

Yours sincerely

Clare Price

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Remit: The Twentieth Century Society was founded in 1979 and is the national amenity society concerned with the protection, appreciation, and study of post-1914 architecture, townscape and design. The Society is acknowledged in national planning guidance as the key organisation concerned with the modern period and is a constituent member of the Joint Committee of the National Amenity Societies. Under the procedures set out in *ODPM Circular 09/2005*, all English local planning authorities must inform the Twentieth Century Society when an application for listed building consent involving partial or total demolition is received, and they must notify us of the decisions taken on these applications.