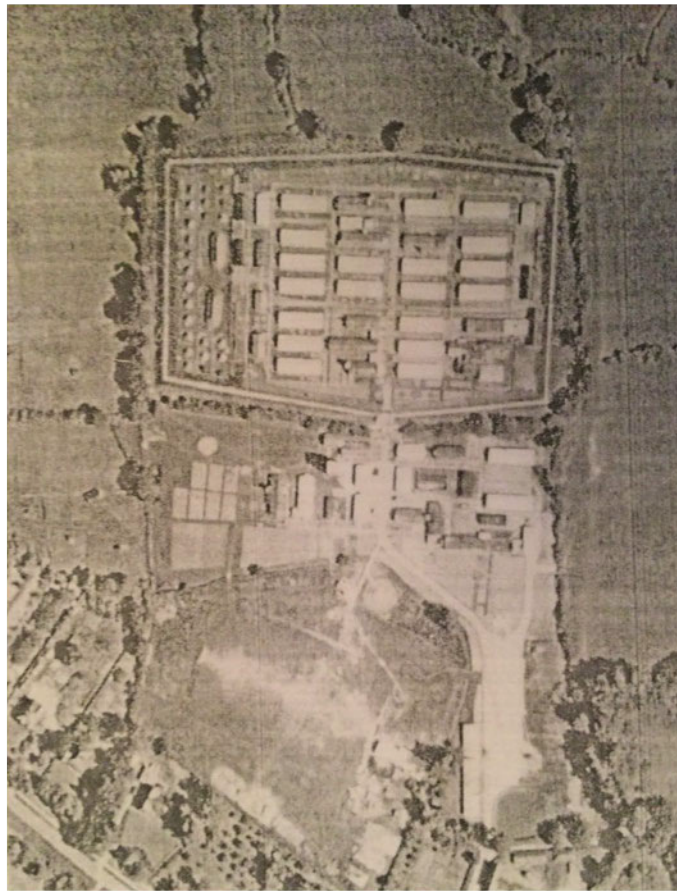


Former Camp 116: Mill Lane, Hatfield Heath, Essex

Heritage Impact Assessment 31st August 2021



1. Introduction

This statement is written to comply with the NPPF for England which requires an applicant for planning permission to "describe the significance of any heritage assets affected, including any contribution made by their setting" [Para 194]. It is intended to provide an understanding of the history of PoW Camp 116 at Hatfield Heath and investigate if the buildings have any heritage significance. Neither the site nor the buildings have any archaeological or built heritage designation and until recently the buildings were not 'locally listed.' The revised Uttlesford Local Heritage List of April 2021 now includes the former camp.

The statement accompanies an application for planning permission to repurpose many of the remaining huts in the guards' compound and to build 4 new single-storey houses in glades in the woodland that has enveloped the western half of the site since the war. In the light of the findings of heritage significance, it will assess the impact thereon. The statement has been revised from its original incarnation of 2018 to consider not just the revised development proposals but also the site's new status as a locally listed heritage asset.

The assessment has drawn upon primary sources, current legislation and planning guidance. Historical information has been taken from books, websites and archival material as compiled in the archaeological desk-based assessment (DBA) (Archaeological Solutions: 2016).

2. World War II Prisoner of War Camps

A BBC report of 2015 noted that more than 500,000 Italian and German fighters were brought to Britain as prisoners of war during World War Two. "They spent the remainder of the war in commandeered stately homes, old Army barracks or hastily thrown together huddles of huts, often built by the prisoners themselves."¹

The report highlights the difficulty in defining exactly what constitutes a WWII Prisoner of War camp in the UK. The sheer variety of types, sizes, and classes of buildings is one factor; the other is that the number and types of camp varied throughout the war. In addition to the base camps, a large number of semi-autonomous hostels were established out in the country, and a large number of PoWs were billeted on farms.²

Contracts for the building of camps were issued in 1942 and 1943 to well-known construction companies, but the prisoners built many of the 'Standard' camps themselves, living under canvas until the accommodation was complete. The most common variety of building used was the 18ft 6in-span Ministry of War Production (MoWP) standard hut, although some sectional timber, Laing, 16-ft and 24-ft span Nissen, British Concrete Federation (BCF) and Orlit huts were used at a number of sites.

Twelve of the known camps survive looking much as they did during World War Two and of the purpose-built types, five are listed as complete in the English Heritage survey of 2003³. Eden Camp in Malton is a war museum. Cultybraggan camp in Perthshire has been converted for business units and Friday Bridge in the Cambridgeshire fens is used as agricultural workers accommodation.

Harperley Working Camp is the only designated one, scheduled in 2012 but on the "At Risk" register, in very bad condition, vacant and at Category A - Immediate risk of further rapid deterioration or loss of fabric; no solution agreed. The reasons for designation include the following statements:

"Around 100 World War II PoW camps were purpose built in Britain. These, with a small amount of variation, followed a standard plan. A compound, forming two thirds of the camp, was occupied by the PoWs, with buildings for the camp's guards being sited between this compound and the main entrance. Buildings were typically Ministry of War Supply Standard Huts, with normally two thirds of their number used as sleeping quarters. In

² See report on the Ewyas Lacy Study Group website [REDACTED]

³ Roger Thomas. PRISONER OF WAR CAMPS (1939 – 1948.) Swindon: English Heritage, 2003

addition to washing and dining facilities, accommodation for a chapel, as well as recreation facilities, were also normally provided.”

“Little remains of the vast majority of PoW camps, most having since been cleared. Only around 10% of World War II purpose-built camps are thought to still survive, only some being within England. Survival of other military camps reused for PoWs as well as specifically PoW related structures at camps using requisitioned buildings are similarly rare. In addition only a small proportion of the contemporary documentation still exists. *Those sites that retain a significant proportion of their original layout, with surviving features or buildings that are indicative of their use by PoWs will be regarded as of national importance.* Sites of especial historical importance, or any predating World War II, may also merit protection if they retain surviving remains.”

“Harperley Camp is a *very rare surviving example* of a purpose built PoW Working Camp. *It retains 85% of its original buildings in a roofed condition, including all of the main huts.* *The survival of wall paintings and internal fittings in a number of these structures is also very significant.* *The camp’s importance is further heightened by the contemporary documentation* at the Public Record Office and the fact that the camp was used for both Italian and German PoWs.”



Low Harperley Camp, Co Durham

3. Methodology

In simple terms, cultural value (heritage significance) is the perceived value of a place to society and the purpose of this assessment is to identify if, or why, the camp buildings, are valued according to societal norms.

A heritage assessment (HA) identifies what is crucial to heritage significance and what should be protected and offers guidance as to how a heritage asset can be conserved. The assessment will also clarify which items have little or no value or which actively detract from the significance such that changes and opportunities for enhancement can be explored. A heritage impact assessment (HIA) is used to assess the impact of proposed changes to the heritage significance of a heritage asset.

The assessment technique is especially useful for understanding the “special” architectural and/or historical interest which ‘listing’ recognises in principle and protects by law. The EH PoW camp report gives a one-line description of the site; in such instances, an HA can flesh out the nature of the special interest, if any – what the National Planning Policy Framework (NPPF) calls simply, ‘significance’.

The NPPF requires that an applicant for planning consent describes the significance of any heritage assets affected by the proposal. A heritage asset is defined as:

“a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage asset includes designated heritage assets and assets identified by the local planning authority (including local listing). A designated heritage asset is defined in NPPF as “A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation”.

As noted above, the site and its buildings are not designated heritage assets, but they are ‘locally listed’ which would allow them to be a material consideration in the planning process. Para 197 of the NPPF says that ‘the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application’ and that a ‘balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset’ and I have been asked to investigate the nature of the heritage value that constitutes the ‘significance’ in this case. Since the first draft of this statement, a government inspector has written of the site,

“although the buildings individually may be of limited interest, Camp 116 as a whole is undoubtedly a non-designated heritage asset that is of considerable historic and archaeological interest given the rarity, association with a national event and the relatively good state of preservation.”⁴

Assessments of levels of heritage significance are sometimes set out using the old English Heritage (now Historic England) categories of evidential, aesthetic, historic and communal significance. These were devised for the EH publication, Conservation Principles (2008) which is now being revised to use the NPPF categories of **Architectural, Historic, Artistic and Archaeological value**. This document uses the NPPF categories.

⁴ Appeal Ref: APP/C1570/W/19/3236047, 17 December 2019

In carrying out the assessment of setting, the surroundings in which a heritage asset is experienced, the Historic England guidance *The Setting of Heritage Assets GPA3* (second edition Dec 2017) has been referred to; it advocates a proportionate and staged approach but recognises that other approaches can be equally valid.

Levels of significance in this document are given for the buildings as a whole but individual aspects or elements of each building are also graded as no heritage asset is uniform. The levels of significance used are as follows:

- Exceptional significance: internationally significant aesthetic, cultural, evidential or communal significance; exceptional areas/elements such as primary elevations or workmanship; nationally and/or internationally important associations with people or events; unique and intact elements of highest quality; unquestionable group value. Grade I structures.
- High/ considerable significance: nationally important historic or architectural features; high quality of workmanship; potential for nationally important archaeology; largely intact and/or rare examples of a particular building type or technique; important positive group value. Grade II* structures.
- Some Significance: Formal, heritage or aesthetic significance, architectural character or notable features, including areas with potential for significant enhancement; some group value; surviving decorative features of historic or architectural interest. Grade II structures.
- Low significance: Little or no architectural or heritage significance or area of lost significance
- Not significant: Of no heritage interest
- Detrimental: Features or areas that detract from a building's significance

Historic England say in their principles for listing, that many buildings are interesting architecturally or historically, but, in order to be listed, a building must have "special" interest. The statutory criteria for listing are the special architectural or historic interest of a building. The Secretary of State uses the following criteria when assessing whether a building is of special interest and therefore should be added to the statutory list:

- Architectural Interest

To be of special architectural interest a building must be of importance in its architectural design, decoration or craftsmanship; special interest may also apply to nationally important examples of particular building types and techniques (e.g. buildings displaying technological innovation or virtuosity) and significant plan forms.

- Historic Interest

To be of special historic interest a building must illustrate important aspects of the nation's social, economic, cultural, or military history and/ or have close historical associations with nationally important people.

Additionally, HE say, "There should normally be some quality of interest in the physical fabric of the building itself to justify the statutory protection afforded by listing."

The NPPF adds the following two components of heritage significance:

- Artistic interest which is an interest in other human creative skills, like sculpture.
- Archaeological interest, present if an asset holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.

Since the site was first assessed, the Council has added it to its local heritage list (April 2021). The document's aim is set out at para 1.2 and 1.3 thus:

"In addition to nationally listed buildings, there are ... non-listed buildings ... that are considered to be locally significant and make a positive contribution to the character and distinctiveness of Uttlesford... [for] their historic, aesthetic, evidential or communal value, or a combination of these factors. These are non-designated heritage assets. This List has been compiled to formally identify and celebrate these assets of local importance ... The list should be used to inform future development proposals, with a view to 'sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation' Para. 185 – National Planning Policy Framework (NPPF), 2018."

And the assessment allows for this local level of heritage interest.

4. Potential for Heritage Significance

Hatfield Heath is a village in north-west Essex, c.4km east of Sawbridgeworth and c.6km south of Bishop's Stortford and Stansted Airport. The M11 motorway passes c.1km to the west, while Hatfield Forest, a former royal hunting forest, is situated to the north of the village. The village is primarily linear, positioned along the east-west route of Stortford Road/Chelmsford Road (A1060), with the B183 extending to the north-east and south-west, connecting with Hatfield Broad Oak and Sheering respectively.

The old PoW encampment comprises two parcels of land on the north-west side of the village, adjacent to residential development on the north-side of Stortford Road. The land is situated to the rear of residential development on Stortford Road, Mill Lane, and the Little Heath/Broomfields development. The parts of the site are described in the desk based assessment carried out by Archaeological Solutions [AS(2016)] as:

SITE 1: 'Previously developed land to the south of land comprising Greenways Eggs Ltd'. (c.4.55ha) A mix of open and wooded areas containing a group of buildings, the majority

located in the eastern part of the site, with a few adjacent to the internal access road close to the south-east boundary. The majority of the buildings are of block work construction with corrugated asbestos and tin pitched roofs, with some having metal water tanks mounted on brick towers above the roofs. A few buildings are of wood with corrugated asbestos pitched roofs. There is also a four-storey brick water tower, a large open ended Nissen hut and large areas of concrete hard standing that once formed internal roads and bases to buildings.

Site 2 'Land comprising Greenways Eggs Ltd'. (c.1.9ha) This site has a number of long rectangular buildings covering the bulk of the site. The buildings are a mix of wooden and block work construction with pitched roofs and are arranged in formal rows with internal roads between them. The height of the eaves and ridges of the roofs is not particularly great and the external water tanks on brick towers serving the buildings are visible.

The DBA notes that the site was undeveloped agricultural land until the demand to house War-time prisoners resulted in the erection of Camp 116 – one of those “huddles of huts” described earlier – in 1941-2. It was made by Italian prisoners from the usual standard components and Germans were introduced in 1943/4.

Description of the buildings:

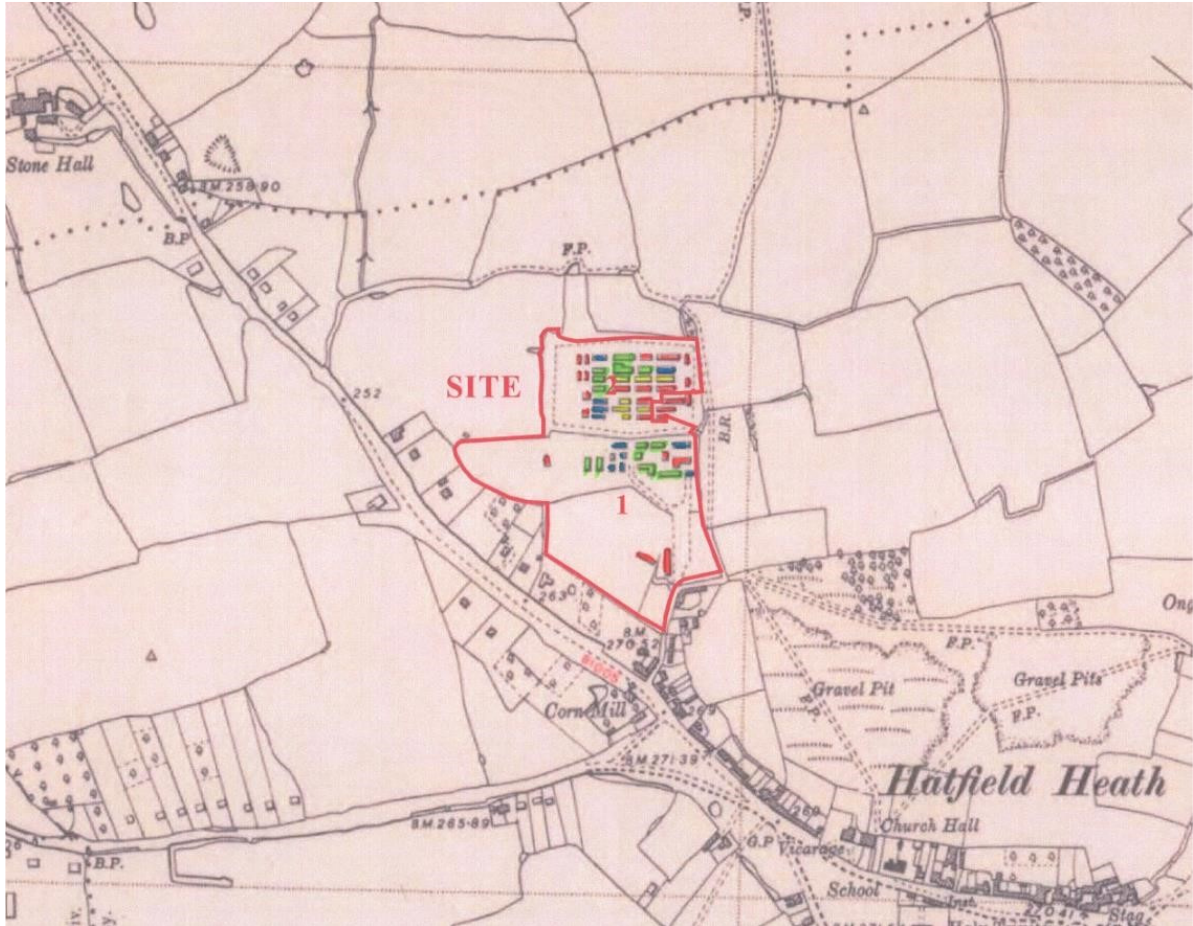
The following is culled from the DBA and a site inspection:

Camp 116 is a so-called 'Standard' camp, with a Guards' compound situated to the south (in Site 1), a Prisoners' compound to the north (in Site 2), and a separating drainage ditch and concrete bridge. The Guards' compound consists of MoWP huts with a brick-built water tower in the western half, with inter-linked building in the south east area comprising the kitchen, washhouse and latrines. The Prisoners' compound consists largely of timber Laing huts (Fig.14), with a group of three MoWP huts in the south-central area comprising the former hospital, with a further group of standard huts to the north, possibly including the canteen. The distribution of construction of the MoWP huts in both areas was not examined in detail, but, as in many camps, the Guards' buildings use hollow clay blocks as nogging, and Prisoners' buildings have concrete panels. Italian graffiti, a frequently identified feature of PoW camps, has been identified as present in the canteen of Camp 116 and some fixtures and fittings including light switches, work surfaces and water pipes remain despite modern vandalism.

Generally, the buildings are dilapidated and overgrown but many of the buildings in the Guards' compound, and the re-used buildings in the Prisoners' compound are in reasonable condition. It was rated as 'Condition 2 – near complete' by English Heritage when it was surveyed by EH in 2003, having between 50 and 80% of its buildings, but this number has reduced over the intervening 15 years.

Aerial photographs taken in 1960 show that Camp 116 had approximately 43 huts and a water tower, with 15 huts in the Guards compound, of which 5 have been lost and 6 are partially collapsed. In the Prisoner's yard there were 28, of which 13 are lost and 5 partially collapsed. This would put the surviving site into EH's Category 3 -Partial Remains.

The Ministry of Defence decommissioned Camp 116 in 1955 and returned the property to the original owners with the opportunity to clear the huts, although both owners elected to keep them, with some dismantled and moved to New House Farm to become calf and storage sheds.



1946 OS Map: Red: removed. Green: standing. Blue Partially collapsed. Yellow: modified heavily



Typical guards building



Typical prisoners' huts



Canteen wall painting

It is of note that in the one scheduled camp, HE have looked at the evidence of human occupation rather than the buildings themselves for that special interest. Of the four NPPF values, they have concentrated on historic and artistic values rather than architectural or archaeological ones.

The first criterion used was intactness. Harperley was over 85% complete. Camp 116 had only about 50% of unaltered, repairable building in the 2003 survey and less now. Original layout was next. This is discernible here but is confused by later additions and alterations – and losses. The third criterion was *surviving features or buildings that are indicative of their use by PoWs*. Most of the buildings have no such signs, save for a mural. And there is a non-standard brick tower. The fourth criterion, early sites (e.g. Napoleonic) does not apply. PRO Documentary evidence is available for Harperley. None is known for this site. Occupation by both Italians and Germans is cited, and that applies here.

5. Ascribed values

Archaeological value: The DBA confirms that there is no archaeological value

Architectural value: There is no quality of interest in the physical fabric of the buildings themselves; there are no unique plan forms; no special design or craftsmanship. The only nonstandard building is the water tower whose architectural merit is dubious. HE guidance

on setting up local 'lists'⁵ has a scope table which says for 'aesthetic' interest: The intrinsic design value of an asset relating to local styles, materials or any other distinctive local characteristics. The site has nothing in the way of distinctiveness, it being a standard military installation. There is no *distinctive* group value either as the BBC's huddle is the word that most fits this site. The site *does* have a group value though, as a local landmark, and this is further considered below.

Artistic value: Artistic interest is an interest in other human creative skill, like sculpture. There is a mural in the canteen block which is of some interest and in tandem with the trend in listings to record sculpture and prisoner-made memorials, there is a case to afford the canteen building *some* artistic value.

Historic value: Using the HE definition, there are no known associations with 'important' people and there is no special illustration of military history, as say at the Lippitt's Hill site near Waltham Abbey where the stated historic interest is in representing the early transition of Cold War British defence policy *developing from Second World War practices*, but taking into account the use of jet aircraft and atomic bombs; *as a rare survival*, being one of only three Anti-Aircraft Operations Rooms remaining in Essex. The concrete sculpture at that camp is also listed as the principal memorial to the German prisoner of war camp providing "an insight into the more domestic and humanistic presence adding a sense of warmth and creativity in the aftermath of conflict." There is nothing of this quality at Hatfield Heath. In terms of local listing, HE guidance, under 'social and communal value' suggests we look to a relationship to places perceived as a source of local identity or distinctiveness and the site does not qualify on this basis either.

Setting issues are of little consequence on a site without any of the usual heritage values. But the scheme does address the business of setting as if the core guards' group of huts were listed, and pays attention to its setting. In the first instance the approach is managed and 'refurbished' to enhance the appreciation of the group. The centre of the group is consolidated and made into a communal green which further unifies the group. The landmark tower repaired and enhanced and the woodland is managed and enhanced. The new single storey blocks within will have no co-visibility with the historic group so will not harm the setting.

Local listing. The site has been assessed by the Council to comply with the following criteria:

A Rarity. Is it a rare surviving, or substantially unaltered example of a particular type, form or style of building or materials within the context of the local area?

B Aesthetic Value. How does the aesthetic or design merit relate to the local character and distinctiveness of the district, including the form or architectural style of the asset, choice of materials and quality of workmanship?

⁵ [REDACTED]

See Page 9.

C Group Value. Does the asset form part of a grouping of assets which contribute positively to local character and distinctiveness?

E Archival Interest. Are there significant written or photographic records, historic or more recent, that enhance the significance of the asset? (Whilst of interest, this is unlikely to be considered reason in itself for inclusion to the LHL).

G Landmark Status Does the asset represent an important landmark within the district either because of its communal or historical value, or its aesthetic value?

It is not said to comply with criteria D or F – archaeology or social or communal value.

Regarding the Council's assessment, the site is not rare; it is unique in the village: it would be a surprise if it were not. Also, this document, the DBA and local testimony and photographs do provide a valuable local archive. Whilst the site does contribute to local distinctiveness, I would maintain that it is not as a result of its aesthetic value but rather by virtue of its existence as a quirk of history and thus a landmark appreciated by some and not others (indeed, communal value is not cited in the report). The notion of group value is developed further below.

6. Condition

The condition of all the unimproved buildings is poor. The concrete buildings all have concrete cancer caused by inadequate cover to reinforcement. Conservation of such structures is costly but subject to survey and specification could be achieved if the buildings were to be put back into beneficial use. The wooden structures are all close to collapse and their asbestos roofs are a health hazard. Tree root damage is rife throughout the site. The 2003 EH PoW report cited in the local heritage assessment records the site as near complete; it is in much worse condition following 17 winters and getting worse. The DBA has a good record of the condition in 2018.

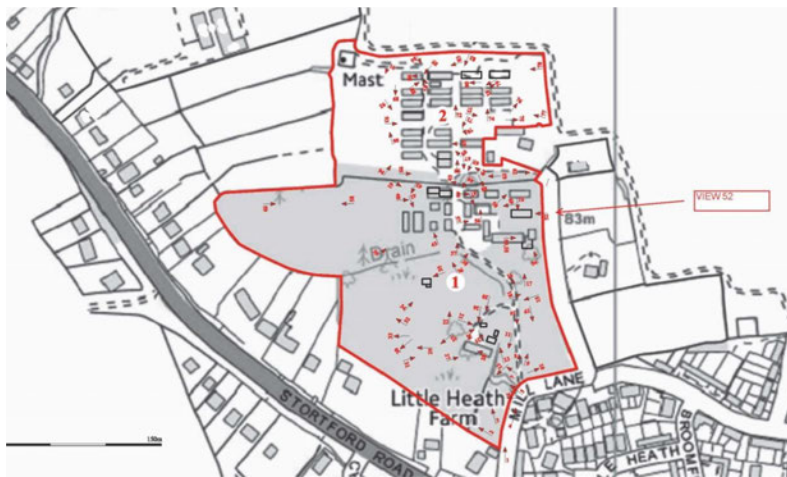
7. Conservation potential

Historic England were consulted on previous applications and showed no interest in the camp which is also on the Council's list of unsuccessful applications for assets of community value but has been locally listed. This brief enquiry suggests that one of the buildings on the camp has some artistic value but in general there is no special architectural, archaeological or historic interest that would merit designating as 'heritage significance.'

Nonetheless, there is local 'interest' and a stated aim of the local council to preserve the site as a physical mark of history. The appeal inspector opined, "although the buildings individually may be of limited interest, Camp 116 as a whole is undoubtedly a non-designated heritage asset that is of considerable historic and archaeological interest given the rarity, association with a national event and the relatively good state of preservation." By HE interest and listing criteria – and the criteria of this assessment – "considerable" is an

overstatement as most values do not even merit a rating of “some” as previously explained. However, there is merit in the group argument; HE define group value as “the extent to which the exterior of the building contributes to the architectural or historic interest of any group of buildings of which it forms part, generally known as group value. The Secretary of State will take this into account particularly where buildings comprise an important architectural or historic unity or a fine example of planning (e.g. squares, terraces or model villages) or where there is a historical functional relationship between the buildings...”. None of the buildings warrant repair on national heritage considerations but if an economic reuse was found for them, our conservation accredited engineer has confirmed that it is possible to retain some of the concrete structures. Conversion would entail the loss of either the interior or the exterior appearance (or both) so that insulation and modern finishes could be applied. Asbestos roofs would have to be renewed and eaves details would alter. Also, windows would have to be renewed.

If there is a will and funding to conserve part of the site to show off the ‘historical functional relationship’, I would suggest retaining the buildings shown in view 52 as shown below:



View 52 from eastern footpath

I have suggested recladding the buildings in timber boarding as it is a common material used on this site and throughout the country in PoW camps and was proposed at Harperley by English Heritage to encapsulate the original concrete. This will protect and preserve the concrete frames at Hatfield Heath and still retain the utilitarian feel of the site. The restoration of the standard Laing timber hut just out of the picture is boarded and will give the right cue.

English Heritage (now Historic England) spent money preserving just two of the many buildings at Harperley and the Weardale Cheese Company have taken up a workshop, so the site is partially preserved: preservation of part of an historic group is a legitimate aim when funds and special interest are lacking. Even so, Harperley, despite its designation, is still Grade 'A' on the at-risk register, in 'very bad' condition. At Hatfield Heath, owing to the raised social media profile, vandalism has increased and the time for conservation of any part of this site will be further limited by this factor. Thus this application may be the last throw of the dice for this collection of structures.

The suggested refurbishment will convey to the viewing public a notion of a PoW camp from a publicly accessible path (reinforced, of course, by the retained sleeping – now egg-packing – portion of the site) and the detailed design will preserve the canteen wall painting and tower, the only two non-standard elements on site (the local heritage assessment singles out the tower as a landmark). Additionally, this could allow local historians to further research the occupants and perhaps establish a value for the painting. In this way, the group and artistic values would be preserved and enhanced. More importantly though, a representative group will be preserved for future generations to enjoy through a reuse that entails public access.

As for the rest of the proposals, the northern egg-packing site remains as the sleeping accommodation group and the sparse landscape in the eastern sector preserved and enhanced so the setting is authentic. Where the woodland has encroached, four houses are proposed in clearings (reduced from 26 in the last scheme). These would cross-subsidise the works as suggested by the inspector and not affect the setting of the rest of the site, nor the public views. Indeed, they take their form from the simple geometric building blocks of the historic site, albeit well-crafted ones and this is a further nod to the historic merit of the former camp.

In summary then, the proposed works do not have to meet the needs of the NPPF for heritage assets. However, the effect of an application on the significance of a non-designated heritage asset should be taken into account and is indeed a central consideration in the process under assessment here. The NPPF when considering a non-designated asset asks us to make a 'balanced judgement... having regard to the scale of any harm or loss and the significance of the heritage asset'. The current scheme applies to only the guards' section of the camp; the prisoners' portion is untouched. It takes the central core of that group and repairs and enhances it, thus preserving a local landmark for this generation and for future generations, through a use (tourism) that provides public access. On balance therefore, any perceived harm is mitigated by the proposals which enhance the significance of the heritage group.