

**From:** Mark Ratcliff [REDACTED]  
**Sent:** Monday, March 18, 2024 10:56 PM  
**To:** Section 62A Applications <section62a@planninginspectorate.gov.uk>  
**Subject:** S62A/2024/0032 Land to the West of Mill Lane, Hatfield Heath

Dear Sir or Madam

**S62A/2024/0032 Land to the West of Mill Lane, Hatfield Heath**

My name is Mark Ratcliff, I am vice-chair and write on behalf of Hatfield Regis Local History Society. This covers Hatfield Heath and the surrounding area and has in excess of 50 members.

I and the society object to the above proposed development application.

We support and endorse the Parish Council's objection copied at the end of this letter, so don't propose to repeat those objections here but will restrict our comments to the historical significance of the site.

Firstly, it seems bizarre that the community is again having to appeal against a development application that has already been considered and rejected by Uttlesford District Council's Planning Committee at the beginning of the year. We trust the Committee's decision will be taken into account by the Inspector.

I grew up in Hatfield Heath and over the past six years I've extensively researched the camp and presented illustrated talks to many local groups. Prior to this, others in the Society have made similar presentations. There is clearly a keen interest in the preservation of the site. My talk to Bishops Stortford History Society attracted 100 members and visitors. I'm shortly due to give a talk to Sawbridgeworth History Society where a similar turnout is anticipated. The talk is popular with community groups too, such as Women's Institutes, showing the interest is not restricted to those with an historical leaning.

There can be no doubt this is an important historical site. It's recognised as such by Uttlesford District Council, being placed on their Local Heritage List as recently as April 2021.

That entry states

*"...some original features survive, including fixtures and fittings, doors, shower cubicles and graffiti, painted by Italian prisoners."*

It is classified under several criteria; rarity, aesthetic and group value, archival interest and landmark status.

In 2003 it was listed as "near complete" by Historic England and since that time we believe there has been no significant loss of buildings.

In his determination of the Appeal into a previous planning application, the Inspector Graham Chamberlain says of the site (para 17)

*"...it is a remarkably rare survival from the Second World War, particularly as the buildings were not designed to last. Thus, 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."*

He also says (para 18) that those proposals to retain only the same 8 buildings as in this application, would

*"...involve the demolition of most of the historic structures, which are a finite resource."*

He says the loss of most of the buildings around the water tower

*“...would result in the central square in the Guard’s compound being lost.”*

and

*“The setting of the camp would also be altered from a collection of structures that can be understood in their original historic siting and context...”*

concluding

*“The harmful impact on Camp 116 as a non-designated heritage asset would be considerable.”*

At para 20 Mr Chamberlain says

*“it has not been demonstrated it would be unviable to preserve more buildings, perhaps at the expense of other planning obligations.”*

And at para 22

*“...it is also unclear whether consideration has been given to the feasibility of other uses that would retain more of the Camp structures, particularly those around the water tower that appear solid and are part of the wider Guard’s compound.”*

We challenge the assertions made in the Heritage Impact Assessment of 31 August 2021 of less than 50% of structures remaining.

Using aerial/satellite/contemporary photographs and maps, as well as viewing the site from the perimeter and following a careful analysis, our calculations are that 36 of an original 57 survive in some form. This is 63%, comfortably placing the camp in Category 2 (near complete) per the Historic England criteria.

We say, at present, anyone visiting the site can clearly get an accurate impression of the camp during its occupation by German and Italian prisoners.

When considering the rarity of the site, all parties rely on the 2003 report that lists five Category 1 and seven category 2 “Standard” camps remaining in England. I have recently reviewed the list using satellite imagery. Today, of those 12 camps, only three Category 1 camps remain and Hatfield Heath is now the **only** surviving Category 2 camp. (See attached documents)

In 20 years, three of the original twelve have been lost completely and another five have been reduced to under a dozen buildings scattered amongst more modern structures, losing their context completely. Camps such as the one on the Heath have disappeared at an alarming rate.

In addition, none of the other 3 surviving camps contain wooden Laing huts, meaning that this site can be considered unique in the survival of both wooden huts as well as the concrete/block structures.

The proposals for the “restoration” of seven of the guard’s buildings are in no way sympathetic to the site’s heritage. Such plans that have been provided are lacking in detail but appear to suggest cladding the structures in wood. This is totally inappropriate and would be confusing for visitors as they would lose their original external appearance. The museum at Eden camp shows that it is possible to restore such huts’ exteriors whilst the interior remains warm and dry.

We believe that this site deserves much more than to be developed for multi-million pound housing. It should be preserved to honour the memory of those who were held at the camp, worked locally, interacted on generally friendly terms with the villagers and in some instances remained in the community after their release.

My and others’ research has uncovered some of the stories of the prisoners and the bonds that were formed between them and the community during and after WW2. Although nearly all the prisoners will have now passed away, the connection between the camp and villagers remains strong.

The Parish Council have given details of their vision for the site which we support-we would welcome the opportunity to establish a local history museum and archive on the site. We also believe it is important that members of the local and wider community should have the opportunity to visit the site and understand its historical significance.

We trust that this application will be determined by a public hearing and would request that we are able to appear to put our objections in person.

Yours faithfully  
Mark Ratcliff  
For and on behalf of Hatfield Regis Local History Society

[REDACTED]  
[REDACTED]  
[REDACTED]

I attach

- 1 A summary showing the changes in condition of the 12 English camps identified as Class 1 & 2 in 2003
- 2 Document showing for each camp a "Site by Side" of OS 1:10,000 1949-1973 with Bing Satellite imagery from National Library of Scotland website ([REDACTED]) and below a Google Earth image of the site
- 3 Document for Camp 116 Hatfield Heath together with an annotated map showing the surviving (yellow) structures on the site  
North 21 out of 38 (55%).  
South 15 out of 19 (79%)  
Total 36 out of 57 (63%)  
(Figures calculated from satellite imagery and views from publicly accessible land)

Below is the submission by Hatfield Heath Parish Council that we fully support and endorse.

To: Whom it may concern

S62A/2024/0032 Land to the West of Mill Lane, Hatfield Heath

The Hatfield Heath Parish Council have reviewed this proposal, an amendment to UTT/17/2499/FUL which was turned down by the LPA and which was subsequently also dismissed upon appeal. It is more or less identical to proposal UTT/22/1261/FUL which was refused by UDC on December 13th 2023 on the basis that "The proposed development would constitute inappropriate development within the Green Belt and additional harm would result from the loss of openness. The harm by reason of its inappropriateness and loss of openness is not clearly outweighed by other considerations. There are no very special circumstances associated with this proposal that would outweigh the harm identified, therefore it fails to meet the tests found within paragraphs 147, 148 and 149(g) of the National Planning Policy Framework (2023) The proposal is therefore contrary to Policy S6 of the Uttlesford Local Plan 2005 and National Planning Policy Framework (2023). Since the proposal is fully within the MGB and outside the envelope and has a major impact on a non-designated heritage site (PoW Camp 116) the proposer argues that the site should be declared an exception site since 8 (out of 20) former guard huts would be restored/preserved and marketed as 'holiday homes'. To pay for the 'restoration' the proposal is to convert an existing water tower to a residence and build three further high value buildings. 12 of the existing camp buildings would be demolished. There is no provision for affordable housing, all non 'holiday homes' would appear to be classified as C3, when they cannot possibly meet the required building standards and the 'restoration' is ill defined apart from the fact that concrete and pot guard huts will be wooden clad to look like the prisoner's quarters existing on a separate site to the North of this one. The developer seeks 'exception' from MGB rules based on the element of

'preservation' and a self-designated description of the whole site as 'previously developed' and 'brown field'.

Firstly with regards to MGB, it is agreed by all parties that the proposed development is fully in the ever diminishing green belt, but there is dispute over the definition of 'previously developed land', with the developer arguing that the site should be so designated and further declared as 'brown field'. We would like again to make three major points:

1. The site was originally farm land that was requisitioned by the war office as a POW camp during WW2. After the war the land was returned to the farmer who owned the land together with the temporary structures used to house the prisoners and their guards. It continued to be continuously farmed, using the temporary structures until the farmer gave up farming in the 80's. Since then it has had no other use and no submissions for change of use have been made. It must therefore be viewed still as farm land (agricultural use only).
2. Temporary structures erected to hold and contain prisoners vary from tented villages, through compounds to the more humane structures found in this case. In no way can any of these be classified as 'prior development' because of their intended temporary and transient nature. Indeed this intent of the MoD by their action was to return the land to farm use

3. The whole area is fully within the MGB and outside the village development envelope

Secondly with regard to the building plan itself we would like to suggest the following

1. The new buildings represent a major uplift in terms of price and structure from the 13 modest dwellings in Mill Lane and effectively form a mini estate. We believe that this is out of keeping with the strip development and gradual blending of the rest of the village through farmland and into the general countryside.
2. The site is isolated from the rest of the village and can only be presently accessed down Mill Lane plus a rural footpath to connect it through Home Pastures to the rest of the village and local amenities (schools, doctors bus stops etc). There is no footway for Mill Lane in the plan and the suggestion is that all will use the rural footpath although Mill Lane is the obvious and by far the shortest way to access all of the above amenities by foot, but given the dangers we believe most of the new site occupants would drive, exacerbating an already unacceptable traffic situation.
3. The application seeks approval to widening and straightening the existing rural footpath to 2.0m (was 3.0m in the last UDC application), creating a new 'hammer head' and gate entrance at the end and presumably paving it. HHPC strongly object to this element of the application since it is a clear attempt to form a second vehicular entrance to the site. There are concrete bollards set into the existing path to prevent vehicular use but these seem to have 'disappeared' on the plans we have

Thirdly, expanding on access to the site and traffic flows:

1. The existing situation is that over the past few years the nature of traffic to and past the site has changed dramatically.
  - a. Greenways eggs (Camp Farm) to the North of the site has transitioned from light vans, to medium sized lorries, to larger lorries and articulated trucks that deliver the eggs to be cross docked at their egg-plant. The fact is that articulated lorries must be guided and personnel posted at either end of the lane to prevent any movement by the residents while these are entering or leaving the premises. The clearance for these trucks at the pinch point at the entrance to the road is just over a hand span either side.
  - b. 10mph limit and road name signs have been damaged and/or destroyed on a number of occasions as have fences and railings of the existing houses at the lower end of the road, which remains essentially a farm track!

c. The number of houses in the road has doubled (all legitimately approved through the LPA). This proposal would be a further major increase even if the so called holiday homes only attained 50% occupancy.

d. An independent survey (Advanced Transportation Research under order number Q17884) carried out between 12th June to 19th June 2018 inclusive revealed 1102 trips were made, 654 due to Greenways and 448 for the 13 modest size houses in Mill Lane (34.5 per household). Rationally this would mean (assuming only 50% 'Holiday Home' occupancy) an added 40 trips per day on top of the existing 64, all concentrated around peak times. This accords with the 27 additional car parking spaces in the proposal. This is certainly not 'unnoticeable' as claimed in the new transport statement and would add to the existing dangers.

e. Since our survey, a major automotive sales and servicing business has been created immediately adjacent to Camp Farm, that receives a large number of visits (including low loaders which are NOT escorted onto the site). This business has no change of use authorisation (from electrical components storage), but continues to operate despite this further exacerbating the situation.

f. Finally, a recent approval by the LPA to expand Hatfield Haven will have a further major impact on parking in and around the area, with ambulances already semi blocking Mill Lane entrance and restricting line of sight, ingress and egress onto the A1060.

g. In summary, Mill Lane is already completely overloaded and this development is not sustainable.

Fourthly we would like to comment on flooding and flood risk

1 The 'Revised Flood Risk Assessment and Drainage Strategy' is frankly a disgrace.

a. It totally ignores the fact that this site has been the major cause of flooding in the Stortford Road in the past and effectively lets the developer off the hook by stating that an existing drainage ditch runs through the site already and they can do what they like.

b. The fact is that the rainwater system feeds across the back of six houses and down a single exit to the Stortford Road and has only just had a major upgrade (by the Parish Council and householders) to prevent the major flooding at the back of the houses on the Stortford Road and on the Road itself. The major cause of flooding has been silt 'passed on' by the landowner.

c. The site owner has done nothing to ameliorate this 'pass on' of the silting problem and apparently feels that they can add to it at will.

d. Although the plan seems to include swales and such like to mediate flow, there will still be a major flow and silt increase into this completely overstretched system which has been ignored. The problem is simply passed on to the downstream owners/sufferers.

e. The Revised Assessment was done in 2016 on three different sites, this being one of them and is completely out of date. Appendices C,D and E post historical photos that are a complete misrepresentation of the present facts including all the work done to prevent silt laden water from the site reaching the road side systems and flooding the road, with many documented traffic problems.

Fifthly we would like to expand on the statements about the POW camp itself and its historical and physical importance to the village.

1. A few years ago the site was open for visits by schoolchildren and the like to visit and learn something about our culture and heritage and how we came to be who we are. This opportunity has more recently been denied them by the joint owners of the property on which the camp stands who have point blank refused access. The school nonetheless continue to run projects about the camp and the part it played in our village and the greater scheme of things sponsored by the History Society and the British Legion. It is therefore a very important part of the village heritage and culture.

2. On this basis the Camp (both this site and that occupied by Greenways) has been included on the latest list of Designated Local Heritage Assets and section 4 status has been applied for that would ensure non demolition of buildings. Even without the physical section 4 document the intention of listing is to ensure access to the public, but as far as we can ascertain the proposed site will be a closed estate community with no general access. This to us completely belies the declared intention of 'preservation'.

3. With regard to 'preservation/restoration', we repeat that this end of the site was dedicated to accommodation for the guards and included the camp water tower and canteen, all block built in concrete. This application would result in the total destruction of the guard hut side of the camp, which would be changed to look exactly like the prisoner hut side, which already exists in quite a good state on the Greenways site and destroy the perceived layout of this end of the camp. Surely restoration should mean preservation of the basic identity and look of the guard complex and ancillary buildings. This is to us not restoration but faking things up to justify the development plans.

4. We have been blankly told the site is not for sale, but if it were our community would sympathetically restore each of the buildings and repurpose them to serve not only as an educational site for the whole of Uttlesford/Essex but also to supplement the social demands of the community. These would address the lack of Gym facilities, craft workshops, library and of course a museum and history society. The works and maintenance would be undertaken by local artisans using on site construction of authentic replacement parts and canteen facilities provided reflecting contemporary arrangements. Further, the site would be modified to support local wild flora and fauna which have been excluded for around eight years and be open to the general public rather than the one day a year previously promised by the applicant.

5. We also question the habitability overall of these 'holiday homes'. It seems from the very sketchy construction plan provided that none of them would close to pass muster if they were being proposed as saleable properties, so why would they be acceptable as habitable as 'holiday home'? We would hope that if this proposal were to go ahead, Building Standards would insist that they were not used for anything other than an historical viewing purpose, however fake that may be!

Sixthly our last housing survey identified the need for affordable housing and NO NEED for a mixture of very high priced houses and holiday homes. The Parish Council are in process of building these houses and have also commissioned a further survey which we expect to reflect a similar situation.

Lastly the applicant relies totally on all other existing infrastructure to support the proposal.

Yet:

1. Foul water systems are already overloaded in Mill Lane leading to frequent blockages. Not addressed.

2. The sewage farm on the Matching Road is overloaded and tankers have already to be regularly deployed. Not addressed

3. The Doctor's surgery is overloaded leading to outside queues already to collect prescriptions and long waiting lists for appointments. While the Parish Council is working with the surgery to ameliorate these issues there is only so much that can be done to bring things under control.

4. The village school is oversubscribed and the electrical, gas, water and telephone systems are all highly marginal. This proposal would almost certainly tip the over the edge locally. In summary, this development proposed is still for an exclusive 'gated' complex that is not inclusive or linked to the village in any way and which takes no account whatsoever of any wishes by the rest of its inhabitants. It could most properly be designated as an 'estate infill' behind the Stortford Road that is completely self-contained in all respects (apart from all

major amenities, services and water egress that are overstrained already). It detracts in all respects from the ethos and direction of responsible and sustainable development that has been the watchword of the village and would only contribute in a major and negative manner to the continued sustainability of the village as a village.

HHPC 140324