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To: [M54 to M6 Link Road](#)
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Subject: Historic England advice. M54 to M6 Link Road Project. TRO 10054. Mitigation planting proposal within block 5/2.
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National Infrastructure Planning. M54 to M6 Link Road Project. TRO 10054. Mitigation planting proposal within block 5/2.

Background

At the December 2020 Issue specific Hearing the ExA considered proposed relocation of mitigation planting in plot 5/2 and made the following request to Historic England:

‘Applicant to arrange discussion and potential site visit with Historic England and Allow Limited to seek to clarify Historic England’s views in respect of effects on designated and non-designated heritage assets at Hilton Park with a view to Historic England submitting further information.’

This email is in response to that request.

A site meeting was held on 6th January 2021 attended by Tamara Percy and Amy Jones of AECOM, Bill Klemperer and Erika Diaz Petersen of Historic England, and Mick Rawlings (Historic Environment), and Simon Bolter (Ecologist) for Allow Ltd . We walked over the area affected and went through the existing scheme proposals for planting within plot 5/2, and various alternatives put forward by Allow Ltd.

Assessment

We have considered the impacts of mitigation planting proposals in terms of impact upon the significance of heritage assets, especially Hilton Hall and the associated Conservatory, both listed Grade I. We have taken into account relevant policy including the National Policy Statement for National Networks, December 2014 (NPSNN), and the National Planning Policy Framework, February 2019 (NPPF) and have also been guided by Historic England’s Good Practice Advice in Planning: 3 ‘The Setting of Heritage Assets’, December 2017.

Although Hilton Park has been altered, especially by 20th century development, large parts of the historic designed landscape remain intact and are part of the setting for Hilton Hall (Grade I listed, National heritage List for England ref: 1039174) and associated buildings, including early 19th century conservatory (Grade I listed, NHLE ref: 1039176). Construction of the new link road will result in the loss of part of the park, including the south section of the historic lake (Lower Pool) and western arm of the Shrubbery. The surviving historic layout east of the road will remain intact, including the area enclosed by the Shrubbery. This area of parkland is subdivided by 20th century ponds and surrounding planting, and has lost the majority of its open growing parkland trees, but still retains its parkland character, which could be in part recovered with through restoration planting of individual parkland trees.

Historic England broadly agrees with the assessment set out in the Highways England Technical Note: '8.22 Assessment of Alternative Locations for Mitigation in Plot 5/2' January 2021. That report sets out 4 alternative approaches to planting. These options, and variants of them, comprised the framework for the site meeting of 6th January.

Option 1 would cause some harm to the historic environment. This is because location 4/20C is alongside the historic park's west entrance, lodge, and approach road that are a more significant part of the setting of Hilton Hall and the Conservatory than the current proposal plot 5/2 is. The level of harm, however, is limited because 4/20C will be to the west of the new road and severed from the rest of the historic park to the east of the road.

Options 2-4 involve progressively more planting to the east of the new road and would progressively cause more harm to the Historic Environment.

Option 2. Adding woodland planting to 'thicken' the Shrubbery. This would have a lesser degree of impact than planting of a single block of woodland in the parkland enclosed by the Shrubbery. It would have a greater impact, however, than planting all of the new woodland on the west side of the new road.

Options 3 and 4. Planting blocks of woodland to the east of the new road would encroach upon the openness of the designed landscape of the remaining, contiguous, core area of the park, and the setting it provides to Hilton Hall and other key historic buildings, such as the conservatory and Portobello Tower. This would be harmful to the significance, derived from their setting, of these listed buildings, including the Grade I Hall and Grade I Conservatory, as well as the significance of the park itself (undesigned).

We assess that the level of harm progressively increases from option 1 to option 4. For all options we assess the level of harm, in NPPF terms, as being within the 'less than substantial' range.

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