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F.A.O Mark Peacock

14 April 2023

**Subject:** Town and Country Planning (Environmental Impact Assessment) Regulations 2017 – Request for an EIA Screening Opinion

Former Hook Estate and Kennel

**Our ref:** L-22278-2.4.2-23-208-RJG

Dear Mr Peacock,

I write on behalf of our client Swing Ltd to request that the Council provides a formal screening opinion to confirm if there is a requirement for an Environmental Impact Assessment ('EIA') in respect of a proposed retirement living (C2 – extra care) led scheme on the site of the Former Hook Estate and Kennels.

This request is made in pursuance of Regulation 6 of the Town and Country Planning (EIA) Regulations 2017 ('the EIA Regulations').

To enable your consideration of this issue, we set out below the following information:-

1. Description of the site and its surroundings and an identification of the environmental sensitivity of the areas likely to be affected;
2. Description of the proposed development including its physical characteristics; and
3. Review of the requirement for an EIA with reference to a description of any likely significant effects and any measures envisaged to avoid or prevent adverse effects (where relevant)

A location plan which clearly identifies the site is also enclosed.

Item 3 is dealt with by reference to a preliminary review of the site and its surroundings, initial investigations and assessments combined with consideration of the issues set out in the EIA Regulations.

In summary we consider that the proposed development will not require an EIA. We outline below the analysis undertaken to reach this conclusion.

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## **1: Description of the Site and its Surroundings**

The site has an area of approximately 16.35 hectares located to the north of Coopers Lane Road; to the south of the settlement of Northaw and to the east of Potters Bar, Hertfordshire. It occupies parts of the north-east facing slopes of a valley drained by Northaw Brook. The Site (as defined by the redline boundary) is continuous, albeit of a somewhat irregular shape and can be divided into an upper and a lower section.

The upper section of the Site, which is at the highest elevation sits adjacent to Coopers Lane Road, which also provides access to the Site via Firs Wood Close. It includes woodland and an area of rough grassland with some dense scrub. To the west of Firs Wood Close and one of the wooded areas are a row of semi-detached residential properties which face onto Hook Lane.

The western edge of Hook Lane forms part of the redline boundary to the Site, whilst to the east, the redline boundary is defined by 1.8 m high panel fencing marking the boundary with the adjacent Oshwal Centre, which contains the Grade II listed building of Hook House and a 'Derasar' or Jain temple for worship, together with a larger area of car parking.

The upper and lower sections of the Site are linked by Firs Wood Close which runs between existing detached residential buildings lining both sides of the Close. This relatively narrow part of the Site also includes open space and a pond, which border the road.

The lower section of the Site is the larger area of the two and contains a mix of developing woodland, rough scrubland and other herbaceous vegetation, together with several large veteran trees, amenity grassland, tennis courts and sections of concrete post and chain-link fencing, amongst other remnant structures, which are still evident. These are the remains of a mix of buildings and structures and other enclosures, which previously catered for the housing and care of dogs, including:

- Extensive paddock fences;
- A former canine hydrotherapy pool,
- Drainage systems, and
- Foundations of former buildings.

The lower section of the Site falls to the north-east and is crossed by an overhead power line. In its north-east corner, and at its lowest point, is an existing pond, which is densely vegetated. The boundaries to this part of the Site are generally densely wooded.

## **2: Description of the Proposed Development**

The outline planning application is proposed with all matters reserved except for primary means of access for up to 150 C2 (extra care) dwellings, including 30% on-site affordable housing, ancillary community facilities, extensive landscaping, and access from Coopers Lane Road. The development would be supported by appropriate car and cycle parking provision and electric vehicle charging points.

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The 'extra care' concept is based around providing the residents at the development with access to care where it is required. The residents are anticipated to have some levels of independence and mobility meaning that they will not require or be reliant on full-time care, although some care will be required at times.

It is anticipated that due to the resident's partial independence it is possible that the residents will own a car to allow them to drive, it is however anticipated that the level of trips will reduce over time as residents age and their dependency on care increases. This is typical for this type of development.

### **3. Requirement for EIA**

The development is one to which the EIA Regulations may apply because it falls within Schedule 2 of the EIA Regulations as an 'urban development project' for a scheme of more than 150 dwellings (category 10(b)). For Schedule 2 developments, the Regulations require that an EIA be undertaken where "the development is likely to have significant effects on the environment by virtue of factors such as its nature, size or location."

In determining whether the development is likely to give rise to significant environmental effects, reference should be made to Schedule 3 of the EIA Regulations. This identifies three categories of criteria:-

1. Characteristics of the development (such as size, cumulative effects, use of natural resources, production of waste, pollution and nuisances, risk of accidents and risk to human health);
2. Location of the development (by reference to the environmental sensitivity of the area); and
3. Characteristics of the potential impact (having regard in particular to the extent of the impact, its transfrontier nature, magnitude and complexity, probability and duration, frequency and reversibility and the possibility of effectively reducing the impact).

Further guidance is provided by the Planning Practice Guidance which confirms that the focus should be on those effects which are significant. It provides as an Annex a series of Indicative Screening Thresholds which includes indicative criteria to assist in determining whether significant effects are likely, recognising that the location and sensitivity of an asset are important considerations.

The Practice Guidance states that only a very small proportion of Schedule 2 development will require an assessment.

The indicative criteria and threshold for projects within category 10(b) states that an Environmental Impact Assessment is unlikely to be required for the redevelopment of land "*unless the new development is on a significantly greater scale than the previous use, or the types of impact are of a markedly different nature or there is a high level of contamination.*" Specifically, the guidance notes that EIA is more likely for sites which have not previously been intensively developed, for sites greater than five hectares, where more than 10,000 sqm of commercial floorspace will be provided or where there will be significant urbanising effects (e.g. over 1,000 dwellings). The Practice Guidance identifies the physical scale of such developments, potential increase in traffic, emissions and noise as key issues to consider in relation to such projects.

We consider below each of the relevant criteria specified in Schedule 3 of the EIA Regulations in turn.

#### **Environmentally Sensitive Locations**

The site is not in a 'sensitive area' as defined by Regulation 2 of the EIA Regulations.

Under the Regulations, "sensitive area" means any of the following—

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- a) land notified under section 28 (sites of special scientific interest) of the Wildlife and Countryside Act 1981;
- b) a National Park within the meaning of the National Parks and Access to the Countryside Act 1949;
- c) the Broads;
- d) a property appearing on the World Heritage List kept under article 11 of the 1972 UNESCO Convention Concerning the Protection of the World Cultural and Natural Heritage;
- e) a scheduled monument within the meaning of the Ancient Monuments and Archaeological Areas Act 1979;
- f) an area of outstanding natural beauty designated as such by an order made by Natural England under section 82(1) (areas of outstanding natural beauty) of the Countryside and Rights of Way Act 2000 as confirmed by the Secretary of State; or
- g) a European site

None of these definitions are applicable and the site is not within a sensitive area as defined by the Regulations.

The following features could be considered to be sensitive at a local level:

- a) Northaw Brook – to the east and north, beyond the site boundary;
- b) 'Northaw Common Parkland' landscape character area, as defined within the Welwyn and Hatfield Borough Landscape Character Assessment 2005.
- c) Sensitive trees

Northaw Brook forms the northern boundary of the site. The EA Risk of Flooding from Rivers and Sea (RoFRaS) rating for the site is 'medium' in the northeast of the site (the area surrounding the existing pond). The risk increases to 'high' along the north-eastern site boundary which is formed by Northaw Brook. The remainder of the site is not indicated to be at risk of flooding. The pond and brook sit outside of the proposed development footprint.

There are no Sites of Special Scientific Interest (SSSI) or Special Protection Areas (SPAs) within a one-kilometre radius. Initial surveys undertaken to inform the development include a Tree Survey, an Ecology desk study, an initial walk-over survey and phase II ecological surveys for badgers, bats, botany, breeding birds, dormouse, herpetofauna (amphibians and reptiles) and invertebrates. Suitable mitigation measures have been incorporated into the proposed development, including the creation of new habitats.

An Arboricultural Impact Assessment has been undertaken. There are a number of high value trees on site, these will be retained as part of the proposed development.

An Air Quality Assessment has been produced, which confirmed that there are no active Air Quality Management Areas (AQMAs) within proximity to the site.

Due to the design of the scheme, its proposed bulk and massing parameters, and integral measures to reduce environmental effects, we consider that the development will not give rise to significant environmental effect requiring assessment in relation to any environmentally sensitive locations.

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We set out further details below, having regard to: the existing conditions, potential impacts and their extent during construction and operation, the potential for offsite impacts, the nature of the impact; the magnitude and complexity of the impact; probability of the impact; and the duration, frequency and reversibility of the impact.

## **Environmental Effects**

### **Landscape and Views**

RPS has been commissioned to prepare a Landscape and Visual Impact Assessment (LVIA) for the proposal. A study area of up to three kilometres from the Site has been defined. The LVIA has identified the following:

#### Baseline

The Site does not lie within any specific landscape related statutory or non-statutory designated areas. It is within National Character Area (NCA) 111: Thames Basin and, at a district level, is shown as falling within the 'Northaw Common Parkland' landscape character area, as defined within the Welwyn and Hatfield Borough Landscape Character Assessment 2005. This study has described the landscape condition of the 'Northaw Common Parkland' as Good and its integrity or 'strength of character' as Moderate.

The Site occupies parts of the north-east facing slopes of a valley drained by Northaw Brook. The lower part of the Site, and that within which the development is proposed, contains a mix of developing woodland, rough grassland and other herbaceous vegetation, together with trees (some of which are veterans), amenity grassland, tennis courts and sections of concrete post and chainlink fencing, amongst other structures. These are the remains of a mix of buildings and structures and other enclosures, which previously catered for the housing and care of dogs. Many of these former structures are still apparent on the Site today, including the extensive paddock fences, the hydrotherapy pool, drainage systems and foundations of former buildings. This part of the Site is assessed as being in a Good/ Ordinary condition with the peripheral areas of the Site being generally in a better condition in comparison to those parts of the Site where the remnant concrete post and chainlink fencing (and other structures) are clearly visible.

The landscape value of the Site is considered to be Medium and, whilst it contains some valued landscape elements, such as its specimen trees, it also contains some detracting features, such as the redundant structures and fencing. As such, it is concluded that the Site does not constitute a valued landscape in terms of the National Planning Policy Framework (NPPF). The wider rural landscape within the valley to the north and east is also considered to be of Medium value and thus is also not considered to be a valued landscape in terms of the NPPF.

A Zone of Theoretical Visibility (ZTV) has been prepared to show the indicative extent of the study area from which views to the proposal may be available and nine viewpoints have been identified from which views to the proposed development are likely. Other visual receptors covered in the LVIA include occupiers of residential properties, commercial properties and community facilities, together with users of the public right of way network and local roads.

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### Likely Significant Effects

#### Construction Phase

The proposed development is likely to give rise to short-term adverse landscape effects upon the Site itself during the construction phase, when a portion of it would become a construction site. However, the impact of these effects would be balanced by their short-term nature. For occupiers of residential properties on the north and the east facing façade of Northaw Park to the immediate south, there is likely to be a temporary significant adverse effect upon views. No other temporary significant adverse effects upon views for the visual receptors included in the assessment are considered likely.

#### Operational Phase

The site extends to 16.35ha of which 2.61ha will be built infrastructure. New buildings of varying height and scale would step down the valley sides towards Northaw Brook. New internal access roads, footpaths and car parking areas would replace an existing, slightly degraded landscape. Some landform modifications would also be required together with retaining walls. However, most existing trees would be retained, including several veterans, which would be set within a parkland landscape with a ground flora comprising wildflower grassland. Other areas would be managed to enhance their landscape and ecological value.

There would be a substantial change over part of the Site and the Proposed Development would form a visible and recognisable feature within the landscape. However, the retention of several landscape elements within it and proposed planting to enhance the parkland character of the Site, would partly mitigate these effects. As such, the scale of the Proposed Development is considered to fit with existing landscape features within the Site. These effects upon the landscape of the Site itself and upon the Northaw Common Parkland landscape character area are assessed as being not significant. Potential effects upon the wider landscape being reduced by the natural containment afforded to the Site by existing vegetation and landform and the presence of not dissimilar development to the immediate south, including the unique architectural style of the Daresar.

There would be a potentially significant adverse effect upon views for occupiers of residential properties on the north and the east-facing façades of Northaw Park which overlook the Site to the immediate south. However, this would be reduced to effects which are not significant by summer Year 15 due to the screening effects of new planting. No other potentially significant adverse effects upon views for any of the visual receptors included in the assessment or upon views from any of the nine representative viewpoints are considered likely.

### Identified Mitigation

Opportunities to reduce the potential landscape and visual effects of the proposal have formed an integral part of the design process to date and have been taken into account in the above assessment of potential landscape and visual effects.

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## Ecology

### Baseline

The ecological baseline at and surrounding the site has been characterised by Aspect Ecology by completing a desk study, an initial walk-over survey and phase II surveys for badgers, bats, botany, breeding birds, dormouse, herpetofauna (amphibians and reptiles) and invertebrates during the 2021 survey season. The site's importance in relation to ecology and nature conservation has been assessed using standard guidelines provided by the Chartered Institute of Ecology and Environmental Management (CIEEM) 'Guidelines for Preliminary Ecological Appraisal' (2017) and by application of professional judgement.

A summary of Aspects survey results and assessments are detailed in Table 1.

**Table 1: Summary of Aspect Ecology's survey results.**

Report	Summary	Level of Importance
Desktop Study	<ul style="list-style-type: none"> <li>There were records of bluebell (<i>Hyacinthoides non-scripta</i>) returned located on site.</li> </ul>	N/A
Amphibians	<ul style="list-style-type: none"> <li>Five on-site ponds and 16 off-site ponds (within 500 m from boundary) were recorded.</li> <li>All on-site ponds subject to further phase 2 great crested newt surveys.</li> <li>Great crested newts found to be present in P2 (low population), P3 (medium population) and P5 (unknown population);</li> <li>HSI scores of P10, 11, 12, 14 and 16 undertaken. All others not accessed.</li> </ul>	Local (GCN and Ponds)
Badgers	<ul style="list-style-type: none"> <li>Three setts recorded on the site.</li> <li>Results of the monitoring of sett 1 from 17 Nov 2021 to 1 Dec 2021 found it to be an active, subsidiary sett.</li> <li>Sett 2 and 3 were not monitored – both considered to be inactive outlier setts.</li> </ul>	Local
Bats	<ul style="list-style-type: none"> <li>Visual inspections of structures carried out in April 2021 – all <b>negligible roosting opportunities</b> with no evidence or PRF's found.</li> <li>Eight transect surveys were carried out with four static detectors deployed in alternating locations.</li> <li>Common and soprano pipistrelle, brown long-eared, myotis sp. and barbastelle recorded.</li> <li>Specific tree inspections were not carried out but a number of trees had roosting features within semi-mature, mature and veteran trees across the site.</li> </ul>	Local (foraging/commuting), Roosting TBD
Breeding Birds	<ul style="list-style-type: none"> <li>49 species recorded, 31 breeding/potential breeders.</li> <li>Priority species recorded breeding on the site included cuckoo and firecrest (a schedule 1 protected species).</li> <li>Redstart and lesser redpoll data records on site from HERC.</li> </ul>	Local
Botany	<ul style="list-style-type: none"> <li>Bluebell and rye brome (<i>Bromus secalinus</i>) data records within the site.</li> <li>Woodland, veteran trees and ponds are considered to qualify as Priority Habitats.</li> </ul>	District (Woodlands and Veteran Trees)
Dormice	<ul style="list-style-type: none"> <li>Dormouse likely to be absent from the site.</li> </ul>	N/A
Invertebrates	<ul style="list-style-type: none"> <li>No evidence for the presence of protected, rare or notable species.</li> <li>No elevated potential for invertebrates.</li> </ul>	Site
Reptiles	<ul style="list-style-type: none"> <li>Low populations of slow worm and grass snake recorded.</li> </ul>	Local

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Further surveys were carried out by AA Environmental (AAe) in 2022, including badger monitoring surveys, habitat condition assessments and supervision of site management works.

Five non-statutory designated Local Wildlife Sites (LWS) fall partially within the site boundary and are of some ecological value. In addition, part of the site is noted as Deciduous Woodland, a Habitat of Principal Importance (HPI). The LWS's and HPI will be retained and protected by the proposals and enhanced where possible. The results of the condition assessments carried out by AAe were used to complete a biodiversity net gain (BNG) assessment. The assessments also determined which of the retained habitats could be enhanced and provided guidance on how to achieve a higher condition.

An Ecological Impact Assessment (EclA) will be produced detailing the potential impacts to ecological and nature conservation receptors and undertaken in accordance with guidelines produced by the CIEEM.

### Likely Significant Effects

#### Construction Phase

The majority of the site due for development lies within habitats of limited ecological value. The more sensitive areas of the site, including the LWS's, HPI and ponds, are due to be retained, protected and enhanced.

Temporary disturbance from the construction phase (such as increased noise, dust generation, lighting and increased human activity) could have an adverse impact on ecological receptors and the species the site supports. In addition, there could be accidental damage from machinery.

As a badger sett has been recorded on site, further monitoring works may be required to classify the sett. If this remains active, then a licence will be required to close the sett (licences to exclude badgers and to close down or destroy a sett are only issued by Natural England between 1 July and 30 November). In addition, a range of standard controls will be implemented to minimise disturbance to badgers that are using the site and active in the surrounding area.

The area of the site due for development does not provide optimal terrestrial habitat for any species of herpetofauna. In addition, the proposals are located some distance away from the ponds. It is recommended that the construction phase is carried out in accordance with a Precautionary Working Method Statement (PWMS) and be subject to an ecological watching brief. This approach will be discussed and agreed with the Local Planning Authority (LPA). If high number of reptiles or any great crested newts are encountered during the works, all works at the site must cease immediately and AAe or Natural England contacted immediately for advice. In the event that great crested newts are found then procedures will then be followed to obtain a Natural England European Protected Species Mitigation Licence (EPSML) to allow the works to proceed.

A Construction Environmental Management Plan (CEMP) will be prepared. The CEMP will include measures proposed to manage, mitigate and monitor the main environmental impacts of the construction, including light, noise, vibration, emissions to air, dust, litter, traffic, water and pollution incidents. The implementation of the recommended measures throughout the construction phase will be secured via planning condition so that any impact on ecology is minimised.

#### Operational Phase

Overall, adverse effects have been avoided or reduced through inherent mitigation and in the retention of large areas of the existing habitats, including the LWS's, HPI and ponds, present on the site. Taken in combination



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with the relatively low level of importance attributed to the majority of the site due for development, the overall operational scheme on ecology is not expected to be significant.

#### Identified Mitigation

The scheme has been designed sensitively to retain large areas of the established habitat, wherever possible. The LWS's within the site will be enhanced including the planting of wildflower meadow areas and individual trees on open grassland and managing non-native invasive species. Where trees are to be lost, to facilitate the new development, these will be cut as near to the ground as possible and used to form a number of loggeries within the woodland and open grassland areas. Also, any existing deadwood will be carefully lifted and added to the loggeries. This will provide important habitat for invertebrates, bryophytes and fungi.

New planting will be introduced to the site. Wherever possible, native species of local provenance or species of known value to wildlife should be used.

The site will be further enhanced by providing a series of wildlife boxes that will be installed on site, either within/on some of the established vegetation to be retained and/or incorporated into the new builds to provide enhanced nesting/roosting opportunities. Any boxes installed will be positioned in accordance with good practice.

An Ecological Management Plan (EMP) will be produced and secured by a planning condition. This will detail the creation of new habitats and their ongoing sensitive management in order to enhance the site in the long term.

#### **Trees**

ADAS was commissioned by Swing Limited to prepare an Arboricultural Impact Assessment in respect of the proposed development of land at the former Hook Estate and Kennels in Northaw.

#### Baseline

A full arboricultural survey of the site was carried out over May and June 2022 in line with the requirements of 'BS5837:2012 Trees in Relation to Design, Demolition and Construction: Recommendations' (BS5837:2012).

The tree survey identified a total of 137 features, consisting of 111 individual trees, 24 groups of trees and two woodlands, which have the potential to be impacted by the proposed development of the site.

In line with the recommendations contained within Table 1 of BS5837:2012, 38 features were assessed as being of a high-quality and retention value, Category A, 50 features were assessed as being of a moderate-quality and retention value, Category B and 43 features were assessed as being of a low-quality and retention value, Category C. The remaining six features were considered to be unsuitable for retention, Category U.

As part of the tree survey an assessment was undertaken to establish if any of the trees surveyed are likely to be ancient, veteran or locally notable. This assessment was completed using the Recognition of Ancient, Veteran and Notable Trees (RAVEN) methodology.

The initial stage of assessment is to determine if the surveyed tree has a very large girth for the species, with this being assessed with reference to a chart of girth in relation to age and developmental classification of trees contained as Figure 1.3 in the Ancient Tree Forum publication "Ancient and other veteran trees: further guidance on management" edited by David Lonsdale.

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Based upon the initial assessment of girth size, 12 trees (T8, T59, T61, T67, T80, T83, T103, T104, T106, T107, T115 & T125) and several trees within a woodland (W85) merited further assessment for consideration under the RAVEN methodology.

Utilising the RAVEN methodology, it was established that 4 trees (T59, T103, T115 & T125) and several trees in W85 can be classified as veteran trees. The other trees of very large girth (T8, T61, T97, T80, T83, T104, T106 & T107) did not exhibit sufficient additional features to merit classification as veteran trees and thus are recorded as notable trees.

### Impacts

Based upon the masterplan proposals, which are indicative only for the purposes of the outline application, the proposed development would be likely to require the removal of 21 arboricultural features, comprising 13 individual trees and 8 groups of trees.

The majority (18) of the features that are likely to require removal are specimens which have been assessed as having a low-quality and retention value, category C, or those which are considered to be unsuitable for retention irrespective of the development, category U. In addition, the removal of two category B features of a moderate value, and of one category A feature, of a high value, would be required based upon the indicative masterplan proposals.

None of the Veteran trees identified within the site would require removal to implement the masterplan proposals.

### Mitigation

Where construction works do potentially occur within the RPAs of retained trees, they are typically the construction of new hard surfaces to form roads and paths through the site. It is anticipated that as the design evolves impacts to trees can be avoided by amending the route of such features to avoid RPAs.

In the small number of cases where building construction encroaches into the RPAs of retained trees it is again anticipated that minor amendments to the building's locations can be achieved during detailed design to minimise or avoid impacts.

A detailed Arboricultural Method Statement based upon final fixed design proposals will set out full details of mitigation to minimise harm to retained trees. Trees removed will be replaced elsewhere on the site.

### **Transport**

RPS have been commissioned to undertake a Transport Assessment for the site.

### Baseline Conditions

To establish that Transportation can be scoped out, baseline and proposed development conditions have been established.

#### *Method of Baseline Data Collation*

Traffic surveys were undertaken to establish the baseline highway conditions for local highway network, comprising Coopers Lane Road. The brief details of the baseline surveys are set out below:

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### ATC Survey

An Automatic Traffic Count (ATC) survey was undertaken on Coopers Lane Road. ATC surveys collect detailed traffic data comprising elements such as vehicle classification, speed, and volume data. The survey was commissioned for the week commencing the 22 June 2022.

The two-way Annual Average Daily Traffic (AADT) is summarised below. AADT is the total volume of vehicle traffic on a road for a year divided by 365 days. From the survey, this is taken from the average of a full 7-day week.

- Coopers Lane Road: 1,976 vehicles.

The maximum 85<sup>th</sup> percentile speed (mph) for each road (both directions) is summarised below:

- Coopers Lane Road: 42 mph.

The above data shows that the maximum 85<sup>th</sup> percentile speed on the roads are significantly below the speed limit of the road which is derestricted (60mph). The average speed on Coopers Lane Road is around 34.5 mph.

There are no identified relevant local committed developments that would materially impact on the above study

The full details of the baseline traffic data will be provided within the Transport Assessment.

### Policy and Guidance

#### *Planning Policy*

The site has been reviewed in accordance with the following planning policy and guidance:

- National Planning Policy Framework (NPPF).
- Planning Practice Guidance (NPG) 'Travel Plans, Transport Assessments and Statements in Decision-Taking' (March 2014).
- Hertfordshire Local Transport Plan (2018).
- Welwyn Hatfield District Plan (2005) Saved Policies.
- Welwyn Hatfield District Plan Review – Car Parking Standards (2004).
- Welwyn Hatfield Borough Council Draft Local Plan Proposed Submission (2016).
- Institute of Environmental Assessment (now IEMA) Environmental Assessment of Road Traffic (1993) (IEMA Guidance).
- Design Manual for Roads and Bridges (DMRB), LA 104, Environmental Assessment and monitoring.

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### Extent of the Study Area

The need to consider the resulting environmental effects of the proposed development has been considered in the context of the IEMA Guidelines.

The IEMA Guidance identifies that traffic flow increases of 30% represent a reasonable threshold for inclusion of highway links within the assessment process, although a lower threshold may be appropriate where there are higher HGV flows. It also suggests that other specifically sensitive areas should be included where traffic flows have increased by 10% or more.

Categories of receptor sensitivity will be defined from the principles set out in the IEMA Guidance, and include the following:

1. the need to identify particularly groups or locations which may be sensitive to changes in traffic conditions.
2. the list of affected groups and special interests set out in the guidance.
3. the identification of links or locations where it is felt that specific environmental problems may occur.
4. such locations "... would include accident blackspots, Conservation Areas, hospitals, links with high pedestrian flows."

There are no identified sensitive receptors in the context of the IEMA Guidelines in the locality of the development site.

### Operation

The greatest daily impact the proposed development will have on the local highway network equates to 14.9% of the Annual Average Daily Traffic on Coopers Lane Road to the west of the Firs Wood Close / Coopers Lane Road junction (295 AADT development trips), with a 4.5% resulting impact to the east (104 AADT development trips). These impacts are less than the 30% threshold indicated by the IEMA Guidelines for links in non-sensitive locations requiring assessment and therefore can be scoped out.

### Enabling and Construction

The AADT generation of the development during the enabling works and construction are anticipated to be much lower than during operation therefore having a much lower impact (in percentage terms) on the baseline AADT.

It is acknowledged that HGV movements will be greater during enabling and construction; however, these are still anticipated to be minimal in the context of the baseline AADT. It is therefore considered that Transportation can be scoped out.

### Summary

It is considered that development traffic will have a minimal impact on the AADT on the local highway network and will not reach the thresholds set out within the IEMA Guidelines for links requiring assessment.

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## **Air Quality**

IDOM Merebrook Limited (IDOM) has been commissioned to produce an Air Quality Assessment (AQA) for the proposals.

### Baseline

The site is not situated within, or in close proximity to, an Air Quality Management Area (AQMA). Additionally, the site is not situated adjacent to any major roads and baseline concentrations of air pollutants are expected to be close to urban background levels.

Although Welwyn Hatfield Borough Council (WHBC) undertakes passive monitoring of nitrogen dioxide (NO<sub>2</sub>) across the borough, the closest continuous and passive monitoring data to the subject site is collected by the neighbouring boroughs; Hertsmere Borough Council (HBC) and the London Borough of Enfield (LBE). A review of published data indicates that annual mean concentrations of key air pollutants in the local area are significantly below the relevant Air Quality Objectives.

### Likely Significant Effects

#### Construction Phase

There is potential for dust and fine particulates to be generated during construction of the proposed development. The level of risk will be assessed using the methodology recommended in 'Guidance on the assessment of dust from demolition and construction' produced by the Institute of Air Quality Management (IAQM) in 2014. Mitigation measures commensurate with the assessed level of risk will be recommended within the AQA. The implementation of the recommended measures throughout the construction phase will be secured via planning condition such that the overall effect of the development on local air quality is not significant.

#### Operational Phase

The proposed development is expected to generate in the region of 44 daily trips which is below industry standard screening criteria which would trigger the requirement for further assessment.

The heating demand is expected to be met by a fully electric system which will mean that the proposed development will not introduce any point source of emissions to air on site. The overall effect of the operational scheme on local air quality is not expected to be significant.

### Identified Mitigation

A suite of mitigation measures will be outlined within the AQA to minimise dust generation and off-site migration during construction of the proposed development. It is anticipated that these will be incorporated within a future Dust Management Plan (which may form part of a wider Construction Environmental Management Plan) together with plans for monitoring the effectiveness of mitigation and an overview of procedures to be followed in the event of any breaches of agreed Site Action Levels. An electric minibus will be provided for use by members of staff and residents.

A Travel Plan will be submitted with the application to encourage sustainable modes of transport and minimise vehicular trips associated with the site.

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## **Heritage**

Cogent Heritage has been commissioned to consider the potential Heritage impacts from the scheme:

### Baseline

There are two listed buildings in the context of the site, the barn at Park Farm to the northeast and Hook House (now Oshwal House) to the south.

It is unlikely that development on the site will have any impact on the setting of the barn at Park Farm due to the distance between the site and the listed building, the intervening barn between them, and the screening effect of intervening trees.

### Likely Significant Effects

#### Construction Phase

The temporary noise generated during construction of the proposed development may have a very minor effect on the setting of Hook House but this is not significant. Changes to the land are similar to the operation impacts, described below

#### Operational Phase

The setting of Hook House has undergone substantial changes and in its present context it is highly unlikely that there would be any significant effects (any potential pre-mitigation effects are likely to be of a low magnitude).

### Identified Mitigation

The impact of the development could be mitigated through a considered approach to design, placement, density and landscaping, which could reduce or avoid any harm to the significance of Hook House. Post-mitigation there is no realistic prospect of any significant EIA effects.

## **Noise**

It is considered that the development will not introduce significant new sources of noise into the area on the basis that the proposed development is predominantly residential (with a small restaurant/bar). The construction phase will be short lived, with good practice measures in place to control noise emissions.

It is considered that the development will not cause significant environmental effects through noise impacts.

There are no known significant sources of vibration in the area, and it is not anticipated that the development will introduce a new source. Construction works will be controlled through a Construction and Environmental Management Plan to control and mitigate the effects of construction noise and vibration.

It is not considered that the development will introduce sufficient effect to warrant inclusion within an Environmental Statement. The site lies in a relatively low noise environment and noise is not likely to cause significant adverse effects on future occupiers. A standard Noise Impact Assessment will be submitted as part of the planning application. This will include suitable levels of mitigation during the construction and operational phases.

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## **Flood Risk and Drainage**

Flood levels for the site have been obtained from the Environment Agency. This indicates that much of the site sits outside of the area at risk of flooding.

The site is to utilise SUDs to control the discharge of surface water to ensure that flood levels are not exacerbated in areas surrounding the development site.

It is considered that the residual risk of flooding to the development is low and that it will have little effect on flooding up and downstream. Overall, the proposed development is considered unlikely to cause significant effects on the environment through flooding.

## **Ground Contamination**

IDOM Merebrook Ltd (IDOM) has been commissioned to undertake a Contamination Assessment at the site.

### Baseline

The ground conditions beneath the site consist of a combination of Made Ground in the vicinity of historical buildings and structures underlain by a combination of Head Deposits, Dollis Hill Gravel and the London Clay Formation.

The investigation identified localised contamination in the areas of the former structures. This was associated with the made ground and was by lead, zinc, copper, nickel, asbestos and Polyaromatic Hydrocarbons.

### Likely Significant Effects

#### Construction Phase

Contamination is only localised to the made ground. Groundworks Contractors will be required to implement measures to prevent cross contamination, or generation of fugitive emissions. Given the low levels of contamination, the effects are unlikely to be significant.

#### Operational Phase

The final development will incorporate clean soils in areas of soft landscaping. This combined with building cover and associated carparking and hardstanding will prevent contact with contaminated arisings, accidental ingestion or the generation of contaminated dusts.

### Identified Mitigation

A Construction Environmental Management Plan will be put in place during the construction phase. This will set out the mitigation measures required during the construction phase.

Remediation will comprise the provision of clean soils in areas of soft landscaping which would prevent harm during the operational phase.

These measures will ensure that the development of the site does not have any significant environmental effects in relation to ground contamination.

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### **Planning Submission**

Notwithstanding your consideration of the requirement for EIA in connection with the proposed development, additional material will accompany the application to assist in your consideration of the proposals. The material could comprise:-

1. Application forms, certificates and appropriate application fee;
2. Application Drawings
3. Design and Access Statement (including landscaping)
4. Planning Statement
5. Air Quality Assessment
6. Noise Assessment
7. Arboricultural Impact Assessment
8. Contamination Assessment
9. Ecology Report and other associated ecological surveys
10. Flood Risk Assessment
11. Green Belt Assessment
12. Heritage Impact Assessment
13. Landscape and Visual Impact Assessment (LVIA)
14. Statement of Community Involvement
15. Sustainability Statement incorporating Energy Statement
16. Transport Assessment (including draft Travel Plan)

### **Conclusion**

From the above analysis, it is considered that the proposed development will not result in any significant environmental impacts that give rise to a need to undertake EIA.

In reaching this conclusion, regard has been had to the Regulations, and in particular the scale of the development, the sensitivity of the development location and of the potential environmental effects of the development during its construction and operation.

We trust that you have sufficient information to determine whether this is an EIA development under the 2017 Regulations and we look forward to your confirmation within three weeks of receipt of this letter.



**Subject:** Town and Country Planning (Environmental Impact Assessment) Regulations 2017 – Request for an EIA Screening Opinion

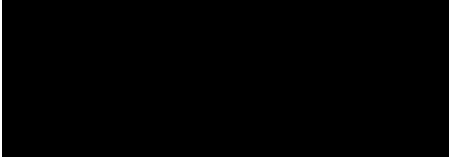
**IDOM**

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Yours Sincerely



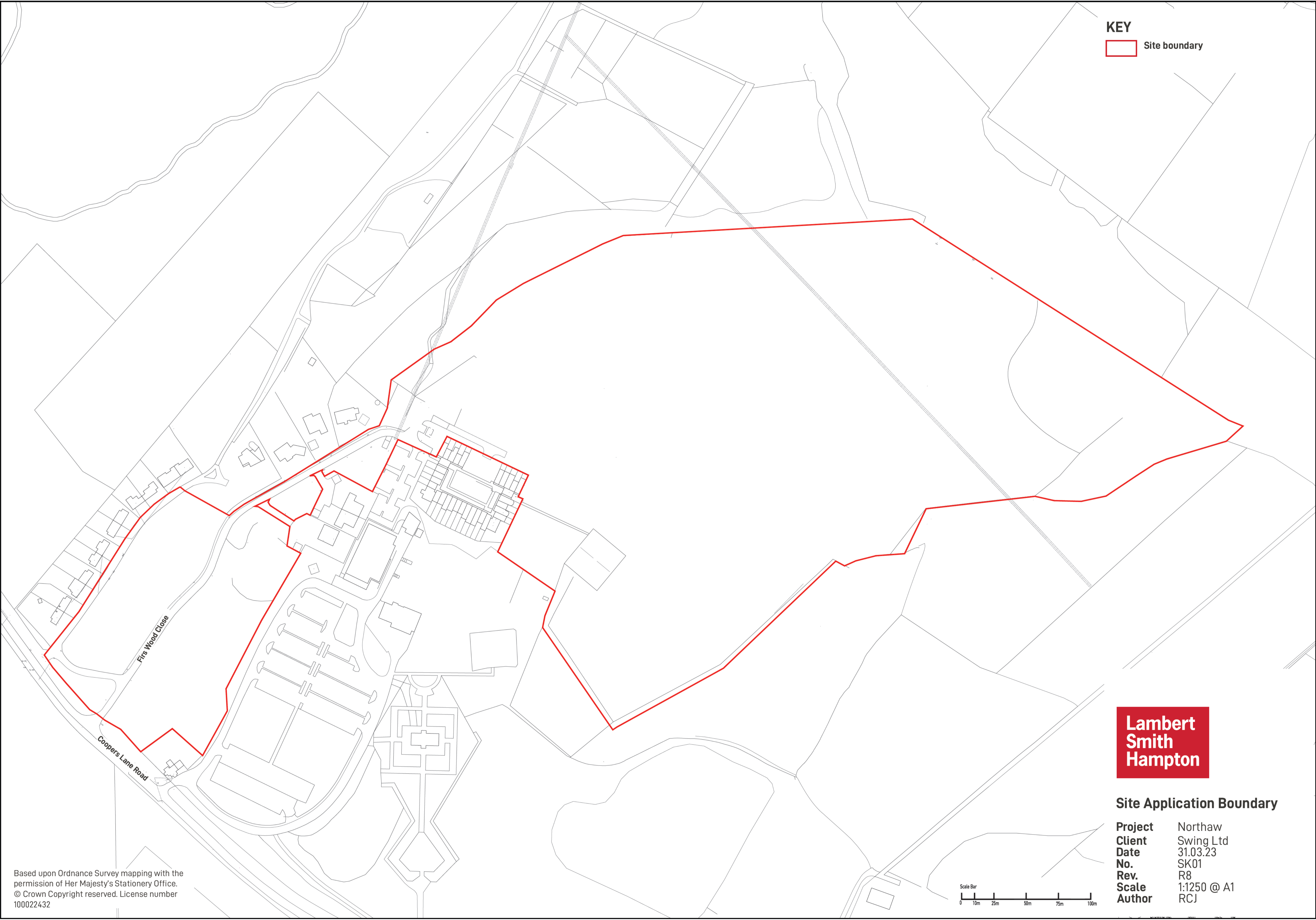
Rob Glavin

For IDOM Merebrook Ltd

Enclosures:

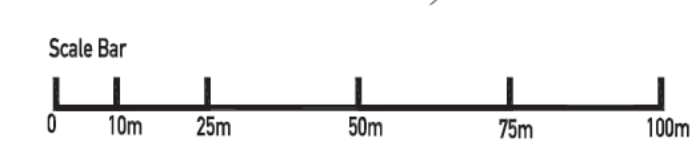
Current Site Layout

**KEY**  
Site boundary



**Site Application Boundary**

**Project** Northaw  
**Client** Swing Ltd  
**Date** 31.03.23  
**No.** SK01  
**Rev.** R8  
**Scale** 1:1250 @ A1  
**Author** RCJ



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