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Dear Clare

The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 Screening Opinion Request for Development at the BioPark, Broadwater Road, Welwyn Garden City, AL7 3AX.

On behalf of our client, Welwyn Park Homes Limited (Ltd.), we request that Welwyn Hatfield Borough Council (WHBC) provides a formal screening opinion to confirm that an Environmental Impact Assessment (EIA) is not required in respect of a proposed redevelopment of BioPark, Broadwater Road, Welwyn Garden City, AL7 3AX ("the Site"). The proposed redevelopment is referred to as "the Project".

This request is made in pursuance of Regulation 6 of the Town and Country Planning (Environmental Impact Assessment Regulations) 2017 (the Regulations).

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

1. Description of the site and its surroundings;
2. Description of the Project; and
3. Review of the requirement for an EIA.

Item 3 is dealt with through a preliminary review of the Site and its surroundings and a consideration of the issues set out in the Regulations which take into account relevant guidance and case law. To assist this review, the following information is enclosed:

1. A Site Location Plan (Annex A);
2. The latest ground floor layout plan (Annex B);
3. Heritage Townscape and Visual Impact Assessment (Annex C), and
4. Preliminary Ecological Appraisal (Annex D).

In summary, we consider that the Project will not give rise to a need for EIA. We outline the analysis undertaken to reach this conclusion below and request that the WHBC confirm this view.



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Description of the Site's Context

A Site Location Plan is provided at Annex A of this letter. The Site is located in the town of Welwyn Garden City and is situated to the south east of Welwyn Garden City railway station.

The Site area measures approximately 1.22 hectares (ha) and is broadly rectangular in shape. However, the planning red line boundary will extend from the main site boundary to south (to include the existing car park) and to the east (to include BioPark Road). The Site is bound to the north by the Pall Mall distribution warehouse, to the east lies residential development (the former Roche Products site), which consists of apartment buildings rising to four storeys. A plot of land containing allotments, alongside the residential properties of Broadwater Crescent, are situated to the south of the Site and the East Coast Mainline creates the western boundary and separates the Site from the town centre. A footbridge over the railway line is located approximately 350m to the north of the Site.

The surrounding area was until recent years predominantly industrial in character and use. However, the area is subject to extensive redevelopment which includes residential and mixed use schemes.

In November 2017, the Site known as the Former Shredded Wheat Factory, the southern extent which is located approximately 100m to the north, obtained planning permission (ref. N6/2015/0294/PP) for a residential-led mixed-use development of 805 units and c. 14,000sqm of commercial and community floorspace. A new permission was subsequently granted (ref. 6/2018/0171/MAJ) in February 2019 for the redevelopment of the site to create a residential-led mixed-use quarter including 1,340 dwellings, community uses, office and retail space. Phase 1 of the development (the southern half is currently under construction).

To the immediate east of the Site, Taylor Wimpey have redeveloped the site known as Roache Products to provide 209 residential homes, consisting of apartments and houses in buildings ranging between 2 to 4 storeys (planning reference ref. N6/2010/1776/MA). This scheme has been built and is operational. The Roche Products building, which is Grade II listed, is also undergone conversion for 34 residential units (ref. N6/2016/1882/FUL) having received planning permission in October 2018.

There are no listed buildings within the Site, nor is the site within a Conservation Area. There are two listed buildings located within approximately 100m (Roche Products office block) and 400m (Nanisco Shredded Wheat Factory) from the Site. Welwyn Garden City town centre Conservation Area lies to the west of the site on the opposite side of the railway line.

Regarding sensitive receptors, the nearest existing are the newly developed residential properties to the east, the residential properties and allotment gardens on Broadwater Crescent.

A plan showing the context of the surrounding area is provided overleaf.



^ Site Aerial View



^ Site Aerial View

Description of the Site

The Site is currently occupied by a complex of industrial buildings ranging from two to 5 industrial storeys with extensive roof plant (which measures at 35m and is the equivalent of approx. 11 residential storeys), which until 2019 were occupied by the University of Hertfordshire for research and development. The complex included chemistry and biology laboratories, specialist facilities, office accommodation and conference facilities.

The northern part of the Site houses a specialist laboratory and associated office space within a main building complex and a number of outbuildings located within the eastern area of the Site. The southern part of the Site contains a tower of approximately 35 metres in height, with attached sheds and ancillary structures. There are two basement car parking levels on the Site, which are located at the northern end of the Site and accessed via a ramp to the rear of the main building. Surface level car parking is also present. The Site is entirely made up of either buildings or hardstanding. Vehicular access to the Site is provided via BioPark Drive, a private road which joins Broadwater Road.

Background

The statutory Development Plan covering the Site comprises the Welwyn Hatfield District Plan (2005) (Saved Policies (2008)). The Draft Local Plan Proposed Submission Document (2016) is at the Examination-in-Public (EiP) stage of the plan-making process and forms a material planning consideration.

The Site is allocated as Employment Area (EA1 - Welwyn Garden City Industrial Area); and within the Broadwater Road West Opportunity Area. It is also proposed as a site allocation for residential development in the Draft Local Plan and is due to be inspected at the EiP later this year.

Description of the Project

The detailed design of the Project is emerging through pre-application discussions with WHBC. For the purposes of providing a robust Screening request the upper parameters have been provided which are considered to represent the reasonable worst case environmental impact:

1. Demolition of all the existing buildings and structures;
2. Up to 300 residential dwellings in buildings of up to nine storeys;
3. A community hub space of up to 100sqm;



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4. Up to 340 car park spaces (including blue badge spaces), the majority of which will be contained within a basement;
5. Cycle parking will be provided in line with planning policy requirements;
6. Existing access will be retained and enhanced, and
7. Areas of public green space and private amenity spaces.

A sketch of the layout of the proposal is provided at Annex B.

Requirement for EIA

The development is one to which the Regulations may apply because it falls within Schedule 2 as an urban development project that includes more than 150 dwellings. However, Schedule 2 provides only an indicative threshold and the size of the development should not be in isolation to determine the need for an EIA. For Schedule 2 developments, the 2017 Regulations require an EIA to be undertaken where:

“...development 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 Regulations. This identifies three factors that should be taken into account:

1. Characteristics of the development (such as size, cumulative effects, use of natural resources, production of waste, pollution and nuisances, risk of accidents and risks to human health);
2. Location of 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 transboundary nature, magnitude and complexity, probably and duration, frequency and reversibility).

Development Characteristics

Size

As described above, the Site comprises an area of 1.22 ha and involves the development of up to 300 residential dwellings and up to 100sqm of non residential floorspace.

Cumulative Effects

There are a number of proposed or committed developments in the immediately surrounding area that are taken into account when assessing the impacts of the Project. Nearby development that is reasonably foreseeable are set out in the table below.

Site	Planning Reference	Description	Decision (Date)
Former Shredded Wheat Factory	2015/0293	Part demolition, repair, restoration, extension and conversion of the former Shredded Wheat factory complex to include demolition of all buildings and structures except the original 1920's silos, production hall, grain store and boiler house. Refurbishment and change of use of the retained listed buildings to provide 2 Class C3 residential units, a Class C1 boutique/budget hotel, Class B1(a) offices, a class Class A4 pub/bar, a class Class D1 crèche and a Class D2 gym/dance/exercise.	Approved (March 2017)
	N6/2015/0294/PP	Outline application for the part demolition, repair, extension of conversion of the former Shredded Wheat factory. Refurbishment and change of use of the retained listed buildings. Erection of up to 805 units and c. 14,000sqm of commercial and community floorspace.	Approved (November 2017)
	6/2018/0171/MAJ	Creation of a mixed-use quarter comprising the erection of up to 1,340 residential dwellings including 414 (31%) affordable dwellings (Use Class C3); 114 extra care homes (Use Class C2); the erection of a civic building comprising 497 m ² of health (Use Class D1), 497 m ² of community use (Use Class D1), 883 m ² of office (Use Class B1) and 590 m ² of retail (Class A1/A2/A3/A4/A5); alterations, additions and change of use of Grade II Listed Building and retained Silos to provide 5,279 m ² of Approved (February 2019) Welwyn Park Homes Ltd Broadwater Gardens Page 9 of 35 flexible business floorspace (Use Class B1), 270 m ² Combined Heat and Power (Sui Generis), 2,057 m ² International Art Centre (Use Class D1), 1,235 m ² Gymnasium (Use Class D2), 1,683 m ² of restaurant/coffee shop/bar (Use Class A1/A3/A4/A5), Creche/Day Nursery (Use Class D1) of 671 m ² as well as a Network Rail TOC Building (Use Class B1) of 360 m ² ; plus associated car parking, access, landscaping, public art and other supporting infrastructure.	Approved (February 2019)
Former Roche Products Site	N6/2010/1776/MA	Erection of 209 dwellings and the retention and alteration of the existing listed building for community uses, together with associated open space, landscaping, car parking and new access arrangements.	Approved (March 2011)
	N6/2016/1882/FUL	Conversion of the listed Roche building to provide 34 residential units.	Approved (October 2018) / Constructed and occupied
29 Broadwater Road	6/2019/3024/MAJ	128 flats with associated car parking, landscaping, amenity space, bin and cycle storage, with alterations to existing and formation of new access on Broadwater Road and alterations to the existing access on Broad Court.	Approved (July 2020)
37 Broadwater Road	6/2018/2387/MAJ	Construction of new build of 22 x 2 Bedroom and 2 x 3 Bedroom residential apartments with balconies and a roof garden. Layout of 26 car parking spaces, cycle parking, refuse store, internal access routes, landscaping and supporting infrastructure.	Approved (July 2019)
Mercury House 1 Broadwater Road	6/2016/2624/FULL	Change of use from B1(a) office to C3 residential, construction of roof and side extensions, creation of 43 residential apartments and cycle storage compound	Approved (September 2017) / Built out and occupied

It should be noted that construction on the Former Roche Products Site (ref. N6/2010/1776/MA) has completed and the site is operational. It is therefore considered to be part of the baseline environment and not deemed to be



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cumulative development. The planning permission (ref. N6/2016/1882/FUL) for the conversion of the listed Roche building to provide 34 residential dwellings has been built out and is gradually receiving new residents. For the purpose of this screening request it is considered to be cumulative development.

The former Shredded Wheat Factory development southern parcel has commenced construction with the northern parcel awaiting a start date and will therefore be considered as cumulative development for the purposes of this screening request.

The three planning applications on Broadwater Road have been identified as being potentially cumulative. One of which (Mercury House) has been constructed and it occupied and therefore is considered to be part of the baseline environment and therefore not cumulative development. The remaining two application on Broadwater Road developments are relatively small in scale and sufficiently distant from the Site, as such they are unlikely to give rise to cumulative impacts requiring assessment under EIA. However, they have been considered within this request.

If the planning application for the Project was to be granted approval, the Project has the potential to be constructed within the same time period as some of the above developments. The construction and demolition works for each scheme will be undertaken in accordance with a Construction Environmental Management Plan (CEMP). The CEMP will include measures to mitigate potential impacts related to air quality, noise, transport, ground conditions and other environmental considerations. With these measures in place, significant adverse residual impacts would not be expected during the demolition/construction phases of development.

The likely operational phase impacts of the proposed development are considered in detail in the following section, with reference made to the Former Shredded Wheat Factory where relevant. Together the effects are not considered to be significant, which would otherwise trigger the requirement for EIA.

Use of Natural Resources and Production of Waste

The Project will not result in the significant loss of resources considered to be scarce. The energy efficiency of the Project is expected to be in line with local and national policy and legal requirements.

The use of natural resources will be typical for an urban development project such as that proposed, as will the production and management of waste. Waste and recycling collection services will take place from a dedicated area within the site. The level and method of waste and recycling is not expected to be significantly different to the existing situation.

Pollution, Nuisances and Risk of Accidents

Given the non-hazardous materials associated with the construction of the Project, the effect of pollution and nuisances will be low. Likewise, the risk of accidents will be low, managed in accordance with Health and Safety regulations.

The construction contractor will adhere to Environmental Health / noise requirements that are typically imposed upon such development projects. It is likely to be necessary for the contractor to complete a CEMP to be agreed with the Council in order to comply with a condition imposed on any grant of planning permission. The contractor will be obligated to work within the terms of the CEMP to ensure that development impacts are managed in accordance with standards set by environmental legislation.

The Project is likely to produce a lower level of pollution when compared to the existing use.

Given the nature of the Project (residential with a non residential element of 100sqm) and the low risk of many major natural disaster events, these are not considered relevant to the Project. The urban nature of the site means that wildfires are also not relevant. The scheme will be built out to the latest Building Regulation requirements which will deal with the potential impact from extreme temperatures.



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Noise is dealt with in more detail below.

The risk of storms and flooding is considered in more detail below.

The risk of major accidents or man-made disasters are not considered relevant given the residential use proposed and the lack of heavy industrial use within the surrounding area.

A review of the Former Shredded Wheat Factory ES indicates no undue concern with regards of risk of pollution, nuisances or accidents; either as a standalone scheme or in conjunction with the proposed development.

Location of Development

The Site is not within an environmentally sensitive area as defined within the Regulations.

The Project will not affect the absorption capacity of the natural environment (as demonstrated below). The Site is not located within a zone at risk of flooding (it is located within Flood Zone 1), but due to the site having a greater area than 1 ha, a Flood Risk Assessment will accompany the planning application that will assess the risk of flooding and surface water drainage).

The Site is not located within an Archaeological Priority Area.

The Site does not fall within an Air Quality Management Area (AQMA).

There are two statutory nature conservation sites within 2km of the Site.

Characteristics of the potential impact (having regard in particular to the extent of the impact, its transboundary nature, magnitude and complexity, probability and duration and reversibility)

The proposal comprises a typical urban development project and would not have significant environmental impacts. In reaching this view, we have identified the following potential impacts:

Highways and Transportation

Welwyn Garden City railway station is located less than 1km walking distance from the Site, accessed via BioPark Drive and Broadwater Road. It takes approximately 12 minutes to walk from the Site to the railway station. A future link, through the new development at the Former Shredded Wheat Factory site to the railway station and via the refurbished footbridge is anticipated to greatly reduce the walking time.

The railway station is served by Great Northern and Thameslink services, providing connections to: Moorgate (4 trains per hour); Kings Cross (2 trains per hour); Cambridge (1 train per hour), and Royston (2 trains per hour).

The Penn Way bus stops are located approximately 16m from the Site and located on Broadwater Road. Both stops are served by the 601 Alban Way bus route. The 601 bus service routes between Welwyn Garden City and Borehamwood via Hatfield and St Albans, and there are two services per hour across the weekday.

Access to the Site will be via the existing BioPark Drive access. The Project will see the improvement of the access to provide a wider shared footway / cycleway on the northern side of the access road. This footway will connect to the existing infrastructure on Broadwater Road and will route directly into the Site. Any alterations to the adopted highway network on Broadwater Road will be subject to a Stage 1 Road Safety Audit (RSA).



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An access road within the Site will provide access to a basement car park to serve the residential dwellings. Up to 340 parking spaces are proposed. Cycle parking will be provided in line with WHBC's standards which are 1 cycle space per home. In addition, 3 cycle spaces will be provided to serve the non residential use.

A service and delivery area will be provided for vehicles. It is proposed that refuse vehicles will collect the bins from designated points.

An initial Transport Assessment (TA) scoping report has been carried out by i-Transport, the findings of which are summarised below.

The existing floorspace of the Site is estimated to be 13,872sqm, while the Site is no longer operational it has the potential to generate the following trips under its permitted use (as estimated using the TRICS database):

- 241 two-way total person trips and up to 137 two-way vehicle trips during the morning peak hour;
- 228 two-way total person trips and up to 118 two-way vehicle trips during the evening peak hour; and
- 2,436 two-way total person trips and some 922 two-way vehicle trips across the 12 hour (0700-1900) weekday.

The trip generation for the Project has also been estimated using the TRICS database, which is summarised as follows:

- 180 two-way total person trips and up to 71 two-way vehicle trips during the morning peak hour;
- 190 two-way total person trips and up to 83 two-way vehicle trips during the evening peak hour; and
- 1,612 two-way total person trips and some 721 two-way vehicle trips across the 12 hour (0700-1900) weekday.

It is anticipated that there will be an overall reduction in total two-way trips across the day, including a reduction of up to 60 two-way total person trips during the network peak hours.

Based upon a preliminary assessment, the Project is not expected to result in any significant environmental transport effects that will require assessment under EIA. However, a full assessment of the traffic and transport implications in terms of transport infrastructure will be provided as part of the Transport Assessment and will fully consider the Project and take account of the potentially cumulative development schemes. A Travel Plan will also be produced which will include detailed information with regards to the sustainable transport options available to future residents.

Any required transport mitigation will be identified and secured through the planning permission.

The Project will also safeguard a potential pedestrian and cycle route to the north of the Site to connect with the development at the Former Shredded Wheat Factory. This has the potential to provide a more direct route to Welwyn Garden City railway station and the town centre.

Air Quality

A preliminary review of the existing and potential air quality conditions has been carried out by Air Pollution Services and is summarised below.



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The Site is located over 1.5km from the nearest AQMA, as such it is considered that the future occupiers of the Project are unlikely to be exposed to poor baseline air quality conditions.

The Environment Agency (EA) regulates that sites which are at risk of contributing significantly to pollutant concentration. There are no regulated sites within 500m of the Site.

The railway line to the west of the Site has the potential to affect air quality as a result of emissions from locomotives using the line.

The predicted NO₂ background concentration have been assessed as being below the Air Quality Assessment Levels (AQAL). Predicated PM₁₀ and PM_{2.5} background concentration have been assessed as being well below the AQAL in all years. In addition, the local authority monitoring (within 441m of the Site) measurements are well below the NO₂ AQAL. As such, the overall air quality at and surrounding the Site is considered to be good.

The Project has the potential to affect air quality as a result of the pollutant emissions generated during operation, demolition and construction.

Given the Project is not likely to result in a net increase in trips it is considered that it is not likely to give rise to adverse air quality impacts from changes in vehicle emissions. In addition, traffic flows on roads adjacent to the Project are likely to be minimal and the Project is not likely to give rise to adverse air quality impacts as a result of changes in streetscape. The Project has the potential to give rise to air quality effects as a result of the energy strategy. An energy strategy will be prepared to reflect national energy standards and comply with Buildings Regulations in order to reduce carbon emissions.

During demolition and construction, air quality impacts are likely to be temporary and local to the development. A qualitative assessment, based on the 'Guidance on the Control of Dust and Emissions during Construction and Demolition' (Mayor of London, 2014) and the 'Guidance on the assessment of dust from demolition and construction' (Institute of Air Quality Management, 2014), will be undertaken and mitigation measures recommended where required. With construction phase mitigation measures, based on the assessment in place, it is anticipated that residual impacts will be considered to be not significant in nature.

Although the Project is located adjacent to a railway line, the majority of locomotives using the railway will be electric powered and not generate any significant pollutant emissions. Contributions from the railway will likely be not significant and air quality for future occupants will likely be acceptable.

Impacts during the operational phase of the development alongside cumulative schemes including development at the Former Shredded Wheat Factory and the permitted developments along Broadwater Road will be assessed by undertaking a detailed atmospheric dispersion modelling study.

The ES for the Former Shredded Wheat Factory concluded that all with the implementation of mitigation measures during construction, such as a Dust Management Plan, there will be a negligible construction impact. During operation the ES identified that there would be a negligible impact on local air quality.

Therefore, it is concluded that the development will not give rise to significant adverse effects, either when considered by itself or cumulatively with other committed development in the area, that will require detailed assessment under EIA.

Noise

Given that there will not be a net increase in trip movements the Project will not give rise to significant environmental impacts in relation to noise during operation.



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The Project will be designed with appropriate noise attenuation measures such as specified glazing to mitigate any impact from railway noise and the operation of the Pall Mall distribution centre.

Overall, given the proposed location of the development and the predominantly residential nature of the scheme, no significant environmental effects by way of noise are anticipated which would require the need for assessment under EIA. As this is the case, no significant cumulative effects related to noise are expected during operational phases and any impact during construction can be suitably mitigated through planning conditions. Notwithstanding the above, noise impact assessment report will be submitted as part of the application.

In terms of the potential cumulative impact, the Shredded Wheat Factory ES concluded that the noise from construction related traffic movements would be negligible and during operation the effects from traffic movements would also be negligible. Therefore, it is considered that the Project will not give rise to significant cumulative effects that will require assessment under EIA.

Flooding and Drainage

Flooding

A Flood Risk Assessment (FRA) will be carried out and will be submitted alongside the planning application as the Site area exceeds 1 ha. The Assessment will consider the flood risk to the Project and the impact that the development will have in relation to flooding of adjacent areas and watercourses.

The entire Site and its surroundings are located well within Flood Zone 1 and are considered to be at low risk of fluvial flooding from significant watercourses.

The wider area, including the Former Shredded Wheat Factory and the committed schemes at Broadwater Road is equally located in Flood Zone 1 and is therefore not deemed to be at risk of flooding. No cumulative flood risk effects are anticipated providing that surface water and drainage matters are adequately dealt with.

Surface Water/Drainage

The existing site only comprises areas of building footprints and hard surfacing which are not currently at high risk of surface water flooding.

A strategy on managing surface water runoff will form part of the application submission and the proposed design and construction methods will take into account the possibility of shallow groundwater. The Project will reduce the overall area of hard landscaping and through the inclusion of Sustainable Urban Drainage Systems restrict future runoff rates to greenfield rates using on-site underground attenuation storage before flowing into the same public sewer. The scheme will include a 40% buffer to account for future climate change.

The impact of the development upon drainage will therefore be positive and will not give rise to significant environmental effects, cumulative or otherwise, which will require detailed assessment under EIA.

Ecology

The Site is not subject to any statutory or non-statutory nature conservation designations. There are two statutory sites within 2km of the Site:

Sherrardspark Wood is a Site of Special Scientific Interest (SSSI) lies approximately 1.1km from the Site and the Commons Local Nature Reserve (LNR) lies 2km from the Site.



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Sherrardspark is characterised by the acid soils which support an extensive ancient semi-natural Sessile Oak / Hornbeam *Quercus petraea* / *Carpinus betulus* woodland. A significant part of this wood is dominated by mature Sessile Oak High forest.

The Commons LNR is a mosaic of habitats including the Blackfan valley fen, broadleaved woodlands, marsh.

One Herts and Middlesex Wildlife Trust Nature Reserved lies within 2km of the Site. There are two Local Wildlife Sites (LWS) within 1km which include the Twentieth Mile Bridge Allotments which lies adjacent to the Site and the Dismantled Railway E. of Sherrardspark which lies approximately 0.9km from the Site.

A Preliminary Ecological Appraisal (PEA) and Preliminary Bat Roost Assessment (PBRA) has been carried out and the findings are summarised below.

The existing Site is dominated by buildings and hard paved areas for vehicles. Formal landscape planting is considered to be sparse and beds of no larger than 50sqm. Few trees are present on the Site and a wedge of ornamental trees with self-sown Sycamore are present along with small patches of overgrown grass and weeds.

The Site is considered unsuitable to support Great Crested Newts; Dormice; Water Voles/ Otters; Badgers; Reptiles; or Hedgehogs.

A bat survey was carried out which concluded that the buildings and trees on site have a negligible suitability to support roosting bats.

The Site is considered to be of limited value for wildlife and there is no evidence for potential to support protected or notable species.

Furthermore the PEA found that the Project will not impact statutory or non statutory wildlife sites within the surrounding 2km radius.

The Project has the potential to provide opportunities for increased foraging, nesting and connectivity for wildlife with landscaping resulting in a marginal net gain in biodiversity on the Site.

Microclimate

Near the ground, the effects of surface roughness associated with buildings, trees or other obstructions influences certain aspects of behaviour and properties of the wind causing the wind speed to generally increase with height. Consequently, impacts arising from wind are usually associated with large buildings over 11 storeys which can cause windward vortices where the wind blows perpendicular to the building and is diverted downward to ground level. The proposed development is generally lower rise with the buildings ranging from three/four storey to 8/9 storeys. It is therefore considered that the project will not give rise to significant environmental effects as a result of adverse wind conditions, however a wind study may be undertaken and submitted as part of the application to assess localised effects to ensure mitigation within the site.

Due to the location of the Project and the nearest cumulative schemes at the Former Shredded Wheat Factory and the schemes along Broadwater Road there is no potential to give rise to significant cumulative effects in relation to microclimate.

Archaeology



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The development site does not lie within an Archaeological Priority Area. Historic mapping suggests the surrounding area comprises relatively modern development, particularly industrial use from the 1890s, with the railway use being associated with the Site from earlier.

An assessment will be submitted in support of a planning application. This will determine whether there are any archaeological remains on the Site and will put in place a strategy for appropriately dealing with any found remains.

Although the foundations are yet to be finalised, it is anticipated that the Project will have piled foundations. Piled foundations are a change of high magnitude and thus have the potential to have an impact on archaeology. However, it is important to note that the current buildings are of sufficient size and contain a two storey basement that any archaeological remains are likely to have been disturbed during the construction of the existing Site. Therefore, the impact of the Project is considered to be limited in relation to archaeological potential. It is considered that the Project will not give rise to any significant effects that would require assessment under EIA. Any effects could be reduced by an appropriate programme of mitigation agreed.

No significant cumulative effects are considered likely given the distance from the Site to the committed developments.

Ground Conditions

A Phase I and Phase II Geoenvironmental Assessment has been carried out by Symbiotic Solutions Ltd, the findings are summarised below.

Historically, by the 1880s the Site and the surrounding area was largely open land with railway lines to the west. By the late 1930s a chemical factory was established on the land to the east of the site (known as the Roche site). Numerous 'works' sites including a film studio, confectionary manufacturers and an electrode manufacturer to the north-east and east. There were railway sidings associated with the adjacent chemical factory running along the current eastern site boundary of the subject site. The site itself was still part of largely open land between the works sites, residential housing to the south-east and the railway line to the west. By 1940s railway sidings were present to the west of the site (around 20m).

By the 1960s there was further development of the chemical factory site and of works sites further east and north (including a Shredded Wheat factory, Polycell factory, tobacco works and confectionary manufacture). No significant development of the Site occurred until the early 1970s when the Site was developed to a layout largely consistent with the current layout (with underground car parking). The railway siding between the subject site and the wider Roche site were removed at this time. Whilst originally part of the wider Roche site it appears the site was developed in largely its current configuration as office and specialist lab space. It is understood that the University did not substantively change the site on purchase and have added just the office space above the car parking in the north-west part of the site subsequently (2010); notably University did not remove any manufacturing infrastructure or tanks etc.

A freight terminal was developed to the immediate north of the site in the 1980s, including a large building consistent with current layout. The Roche site to the east was redeveloped to a residential end use between 2010 and 2014.

Site investigation works involved a 23 soil samples submitted for testing did not identify significant levels of contamination. No significant risks to human health were identified and the investigation did not identify any significantly elevated potential contaminants. It is accepted that there is some potential for contamination hotspots it is considered that these are unlikely to significantly affect the overall risk assessment.



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No significant ground gas or hazardous vapour risks have been identified. Again, whilst currently unidentified contamination hotspots may be present these are unlikely to affect the overall ground gas risk assessment. On the basis of the available information it is considered that no specific remediation measures are unlikely to be required.

No significant risk to controlled waters has been identified. No significant contamination was identified in the site soils. Low levels of cyanide and mercury were detected in the groundwater in the chalk aquifer but are present at their highest levels in the up-gradient wells and absent or very low in the down-gradient well. It is considered that no on-site sources are identified but that there are a number of plausible off-site sources.

No TPH, BTEX, VOC or SVOC concentrations were detected. The site itself is unlikely to be a source of fuel, oil, solvent or other organic chemical contamination; and it appears that potential TPH / VOC contamination arising from the Polycell site to the north / north-east is not affecting the groundwater quality at the subject site.

No significant risks to buried services have been identified. Whilst there is some potential for as yet unidentified localised contamination with the potential to affect buried service materials it is considered that the overall risk is likely to be low.

On the basis of the desk study, site investigation results and observations, laboratory testing and monitoring results no significant risks to human health or controlled waters, no significant ground gas risks and no significant risks to buried services have been identified that require specific remediation / mitigation actions. As such the Project is unlikely to give rise to significant adverse impacts in relation to ground conditions.

No significant cumulative effects are considered likely given the distance from the Site to the committed developments.

Socio-Economic

The Site is was formally a Research and Development use and it is no longer operational. At the time of its closure, it was operating at approximately 44% occupancy.

During construction the Project will have positive economic impacts due to the number of jobs supported and the indirect effects of that increase of employment.

Once operational, the Project will see the introduction of a residential use on a site that has been in industrial use for a number of years. The provision of new housing to meet current demand, including an allocation of affordable housing is assumed to have a positive social impact. However, the introduction of new housing is likely to result in a subsequent demand on social infrastructure such as local services, including GPs and schools.

Reviewing availability in the surrounding area it is clear that there is a good existing provision of social infrastructure.

There are 19 schools within 1.4 mile walk of the site (source: <https://www.compare-school-performance.service.gov.uk/>).

School Name	Provision	Walking Distance from Site	Number of Pupils ¹	Capacity	Capacity – Yes or No?
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¹ Information retrieved from <https://www.compare-school-performance.service.gov.uk/> (Accessed 09.09.20)

Peartree Primary School	Ages 5-11 (primary)	(0.11 miles)	179	270	Yes
Holwell Primary School	Ages 5-11 (primary)	(0.36 miles)	363	420	Yes
Our Lady Catholic Primary School	Ages 4-11 (primary)	(0.45 miles)	211	243	Yes
Shallow Dell Primary and Nursery School	Ages 2-11 (primary)	(0.67 miles)	440	450	Yes
Creswick Primary & Nursery School	Ages 2-11 (primary)	(0.68 miles)	443	480	Yes
Applecroft School	Ages 3-11 (primary)	(0.74 miles)	452	450	No ²
Panshanger Primary School	Ages 3-11 (primary)	(0.85 miles)	235	240	Yes
Templewood Primary School	Ages 3-11 (primary)	(0.93 miles)	228	251	Yes
Stanborough School	Ages 16-18 (secondary)	(0.94 miles)	1094	1124	Yes
Ridgeway Academy	Ages 11-18 (secondary and 16-18)	(0.99 miles)	746	1126	Yes
Lakeside School	Ages 2-19 (primary, secondary and 16-18)	(1.02 miles)	70	70	No
Watchlytes Junior Mixed Infant and Nursery School	3-11 (primary)	(1.17 miles)	224	240	Yes
Harwood Hill Junior Mixed Infant and Nursery School	3-11 (primary)	(1.28 miles)	213	240	Yes
The Holy Family Catholic Primary School	3-11 (primary)	(1.29 miles)	210	217	Yes
Waterside Academy	3-11 (primary)	(1.3 miles)	192	210	Yes
Homerswood Primary and Nursery School	3-11 (primary)	(1.35 miles)	234	210	No
Commonswood Primary and Nursery School	4-11 (primary)	(1.35 miles)	471	510	Yes
St John's voluntary Aided Church of England Primary School	4-11 (primary)	(1.38 miles)	105	105	No ³
Springmead Primary School	3-11 (primary)	(1.4 miles)	341	484	Yes

² Despite the government website stating that the school is currently oversubscribed, the Applecroft School Admissions Policy 2020-21 have 60 places for 2020-2021 admission (<https://www.applecroft.herts.sch.uk/policies/>)

³ Despite the government website stating that the school is currently oversubscribed, St John's voluntary Aided Church of England Primary School Admissions Policy 2020-21 have 20 places for 2020-2021 admission



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Notwithstanding the availability and capacity identified above, appropriately the proposed development will contribute towards the provision of infrastructure through Community Infrastructure Levy (CIL) payments. Local authorities must spend the levy on infrastructure needed to support the development of their area, and they will decide what infrastructure is needed. The levy can be used to increase the capacity of existing infrastructure or to repair failing existing infrastructure, if that is necessary to support development.

Overall, it is considered that there will be a slight beneficial impact in terms of on-site employment in the construction phase, a positive impact on the housing market and local expenditure and a minimum impact on primary and secondary education and primary healthcare, which will be mitigated through the provision of CIL payments.

The Shredded Wheat ES did not identify and adverse construction or operational adverse effects, therefore taken cumulatively the Project will not give rise to significant adverse effects that require detailed assessment under EIA.

Daylight and Sunlight

Daylight, sunlight and overshadowing analysis are currently being undertaken and a technical report will be submitted alongside the planning application. However, an initial desktop review has been carried out by Anstey Horne, the findings of which are summarised below.

The nearest sensitive receptors to the site are residential properties to the east and south east of the Site (including properties along Penn Way and Broadwater Crescent. These properties have the potential to experience some changes to their daylight and sunlight availability.

It is important to note that the existing buildings within the eastern boundary of the Site are at heights which are equivalent of approximately 11 residential storeys. The Project will see apartment blocks of no greater than nine storeys and the massing will be stepped back from the boundaries in comparison to the existing buildings. The taller elements of the Project will be located to the west of the Site, creating distance from the existing residential neighbours.

Based on the above, it is not anticipated that there will be any reductions in light availability that will give rise to a significant impact. It is possible that some existing properties along Penn Way may receive an increase in daylight and sunlight availability.

The committed developments are located at such a distance from the Site and existing residential receptors that there will be no cumulative impacts on the same receptors.

In summary, the initial desktop review indicates that the proposal has been well designed to safeguard the daylight/sunlight of the existing and proposed neighbouring properties, whilst demonstrating the potential to reach good levels of sunlight to its own outdoor areas. No significant adverse effects related to daylight, sunlight or overshadowing is therefore anticipated as a result of the Project.

Heritage and Townscape

A Heritage and Townscape and Visual Impact Assessment (HTVIA) is being undertaken to fully consider the historic environment and any potential effects of the Project. The initial findings of the assessment are summarised below.

There are no designated or non-designated heritage assets within or immediately bounding the site. The Welwyn Town Centre Conservation Area is a designated heritage asset which is located to west of the Site, on the opposite side of the railway line. Within the wider area of the former industrials setting is the Grade II listed Former Office



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Block of the Roche Products Factory and further north the Former Shredded Wheat Factory. Over four kilometres to the south of the Site is the Grade I listed Hatfield House and the Grade I listed Hatfield House Park and Garden. The Peartree Conservation Areas lies some distance to the south east of the Site.

Impact to Heritage Assets

The assessment found that the site at present possesses a landmark quality making it significantly taller than the majority of the buildings within the industrial zone, and creating the impression of a 'bookend', signalling both the termination of the industrial zone along Broadwater Road to the south as well as proximity to the railway line. The retention of this sense of height within the proposals and contrast within the surroundings is therefore seen to have a neutral impact on the surrounding heritage assets. An assessment of the viewpoints has shown that the proposals will retain the existing views of the Shredded Wheat Factory and Former Roche Office, whilst improving the backdrop of these views with a more responsive design, that reflects the architectural quality of the listed buildings, having a moderate beneficial impact upon their wider setting and significance. This includes the retention of the prominence of the silos across the site.

The proposals are considered to improve the quality of the existing views to the site, reflecting the considerable historical importance of the industrial zone within Welwyn Garden City. While the present buildings on site do not have this historic or agricultural quality, there is a clear opportunity to improve the contribution of the site to the surroundings and provide a moderate beneficial impact on the wider setting of the Welwyn Garden City Conservation Area. While it is acknowledged that long range views of the site from Hatfield House and Hatfield House Park and Garden have been identified in previous applications (6/2018/0171/MAJ), these views were not perceptible from accessible areas at the time of the site visit. Due to the considerable distance from the site, existing views of the wider Welwyn Garden City include just perceptible glimpses of the Shredded Wheat Factory and Biopark Building, the impact of the proposals upon these existing views considered to be neutral.

Impact to Townscape

The HTVIA has found that the proposal has no impact upon the currently enclosed views within the town centre to the west. While the proposals will be visible in the existing glimpsed views of the site, it is considered the more responsive design of the proposals which have sought to acknowledge the long range visibility of the site will have a moderate beneficial impact. Similarly through a sensitive pallet of materials and domestic character, the proposals are considered to improve the dramatic existing view points of the site from the railway bridges as well as from Broadwater Crescent to the south, resulting in a substantial beneficial impact. The existing contribution of the site to these views has been found to be negative, and the proposals constitute a significant improvement in townscape terms.

It is therefore considered that the Project will not require further assessment under EIA.

Conclusion

The Project constitutes Schedule 2 development for the purposes of the Regulations, being an urban development project exceeding 150 residential dwellings. The review of factors above indicates that the proposed development will not give rise to any significant impact that would require EIA. In coming to this conclusion, we have had regard to the relevant Regulations and the Circular and, in particular, consider:

1. The setting of the site and the changing surrounding context means that the Project is not out of context with the existing adjacent land uses;
2. The proposal is not within a 'sensitive area', and
3. The proposal is unlikely to lead to any significant environmental effects either singularly or cumulatively.



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We trust you have sufficient information to determine whether this is an EIA development under the Regulations. From these Regulations, we note that WHBC has three weeks (beginning from the date of receipt) to form a screening opinion and to provide the main reasons for this opinion having regard to the relevant criteria listed in Schedule 3. If you agree that an EIA is not required, in your response we note that you must set out any features of the proposed development and/or mitigation measures that are necessary to prevent significant adverse effects on the environment.

Should you require any further information to provide us with a screening opinion, please do not hesitate to contact my colleague Mark Westcott or me.

Yours sincerely

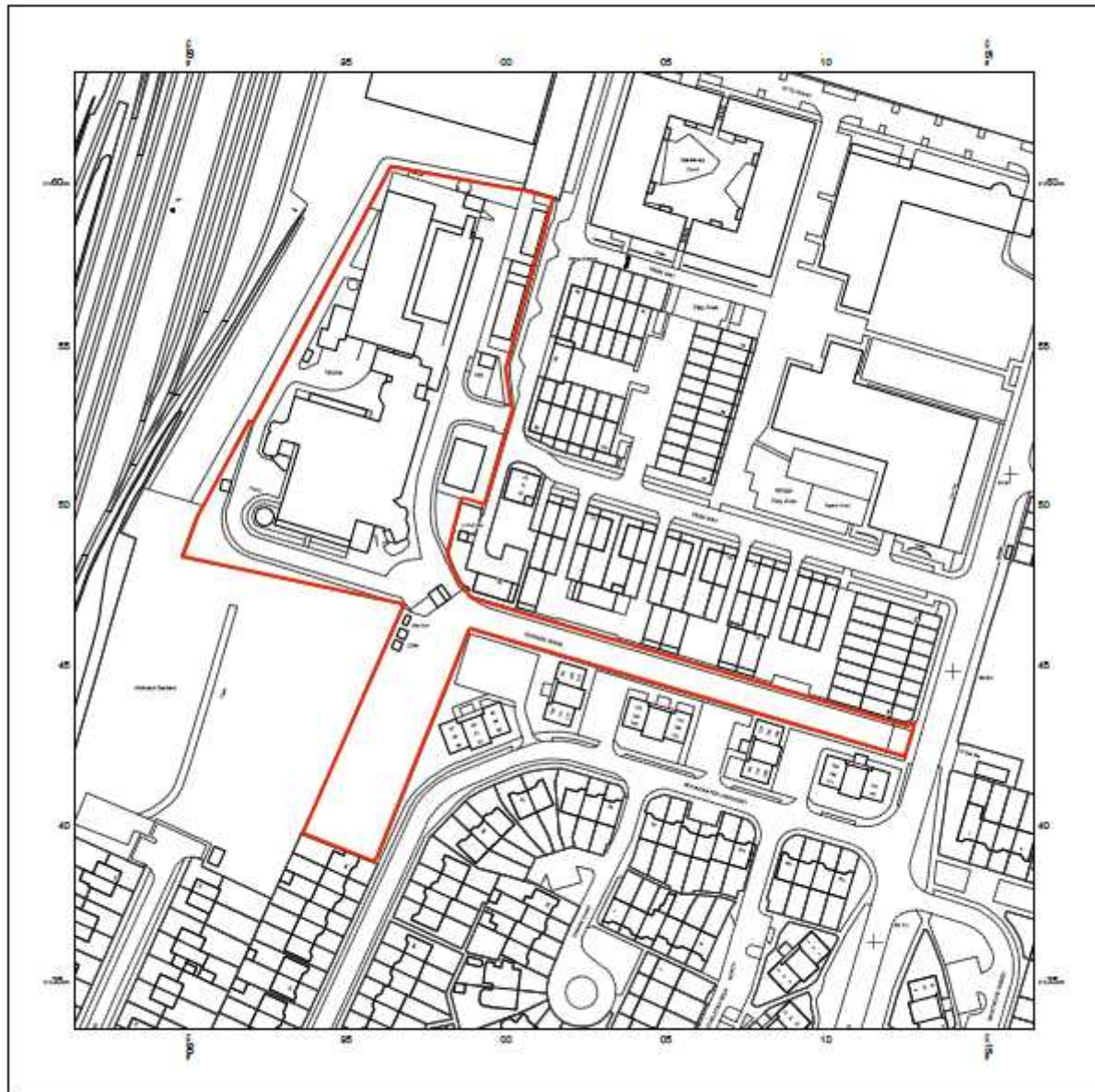
Eve Campbell
Director



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Annex A – Site Location Plan

Bio-Park - University of Hertfordshire
Site Location Plan



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Annex B – Sketch Layout

Site Plan, Ground Floor



^ Proposed Ground Floor



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Annex C – Heritage Townscape and Visual Impact Assessment

BIO-PARK, WELWYN GARDEN CITY

Table of Contents

Table of Contents	2
Quality Assurance	3
1.0 Introduction	4
2.0 Heritage Policy and Guidance Summary	6
3.0 Methodology	16
4.0 Townscape Policy and Planning Guidance Background	22
6.0 Historic Context	25
7.0 Planning History	36
8.0 Site Assessment	39
9.0 Heritage Assets	67
10.0 Townscape Character Areas	81
11.0 Assessment of Impact	95
Appendix 1	
Statutory List Descriptions	111

Quality Assurance

Site name: **Broadwater Gardens**

Client name: **Welwyn Park Homes Ltd**

Type of report: **HTVIA Draft Report**

Prepared by: **Fiona Williams MA Hons MSc**

Signed:



Date: **July 2020**

Reviewed by: **Steve Handforth BA Hons MSc**

Signed:



Date: **July 2020**



1.0 Introduction

- 1.1 This Heritage, Townscape and Visual Impact Assessment has been prepared by Bidwells on behalf of Welwyn Park Homes Ltd to provide an assessment of the potential impacts of the proposed redevelopment of Bio-Park, Broadwater Road, Welwyn Garden City upon the historic environment and surrounding townscape.
- 1.2 The site is located adjacent to the railway line within Welwyn Garden City, within an industrial park. The immediate surroundings comprises the full extent of the industrial park which continues to the north and surrounding residential suburbs to the south, east and west. The LPA are considering the allocation of the site for residential redevelopment (reference: Pea102). At present there is considerable re-development underway to the north with the clearance of a large area of land. To the west of the site, the railway line divorces the site from the Town Centre, an area defined in local policy and separately as the Welwyn Town Centre Conservation Area, a designated heritage asset. Within the same industrial park to the north is the Grade II listed Former Office Block of the Roche Products Factory and Shredded Wheat Factory. Over four kilometres to the south is the Grade I listed Hatfield House and the Grade I listed Hatfield House Park and Garden. In addition to the south east is the Peartree Conservation Area. These are all designated heritage assets and the site falls within these buildings' respective wider and extended settings.
- 1.3 The buildings on site have not been identified as designated or non-designated heritage assets, nor are they located within a Conservation Area. However due to proximity to a number of designated heritage assets, noted above, in accordance with paragraphs 189-202 of the NPPF (2019) this report will include an assessment of the significance of these assets, and the impact of the proposals upon that significance.
- 1.4 The proposed scheme assessed in this report seeks the redevelopment of the site, to provide a residential development of 293 units with associated private and communal amenity space, public open space, car and cycle parking and landscaping.
- 1.5 This statement includes a Significance Assessment which identifies the relative heritage value of the assets which may be affected by the proposals, as well as an analysis of surrounding townscape character areas. It also contains an Impact Assessment which considers the potential impact of the proposed development on the significance of the heritage assets identified, including the contribution made by setting, as well as the impact to the surrounding townscape character areas and identified view points. This approach to impact-assessment is required in order to satisfy the provisions of Sections 66 (1) and 72 (1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 and the National Planning Policy Framework (NPPF) where the impact of development on a heritage asset is being considered.
- 1.6 The findings of this report have found the emerging proposals of two to nine storeys to be a neutral introduction to the setting of the nearby heritage assets and townscape character areas, posing no harm to their significance as well as the overall townscape character. As such the proposals are considered to comply to Sections 66(1) of the Planning (Listed Buildings & Conservation Areas) Act 1990 and we see no heritage or townscape reason why the application should not be viewed favourably from a townscape and heritage perspective.



A Site Aerial View



A Site Aerial View



A Site Aerial View

Figure 1 Aerial view of site (highlighted in red).

2.0 Heritage Policy and Guidance Summary

Legislation

- 2.1 The primary legislation relating to Listed Buildings and Conservation Areas is set out in the Planning (Listed Buildings & Conservation Areas) Act 1990.
- Section 66(1) reads: *“In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.”*
 - In relation to development within Conservation Areas, Section 72(1) reads: *“Special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.”*

National Planning Policy Framework

- 2.2 The revised National Planning Policy Framework (NPPF) was published on 19th February 2019, replacing the previously-published 2012 and 2018 Frameworks. With regard to the historic environment, the over-arching aim of the policy remains in line with philosophy of the 2012 framework, namely that *“our historic environments... can better be cherished if their spirit of place thrives, rather than withers.”* The relevant policy is outlined within chapter 16, ‘Conserving and Enhancing the Historic Environment’.
- 2.3 This chapter reasserts that heritage assets can range from sites and buildings of local interest to World Heritage Sites considered to have an Outstanding Universal Value. The NPPF subsequently requires these assets to be conserved in a *“manner appropriate to their significance”* (Paragraph 184).
- 2.4 NPPF directs local planning authorities to require an applicant to *“describe the significance of any heritage assets affected, including any contribution made by their setting”* and the level of detailed assessment should be *“proportionate to the assets’ importance”* (Paragraph 189).
- 2.5 Paragraph 190 states that the significance any heritage asset that may be affected by a proposal should be identified and assessed. This includes any assets affected by development within their settings. This Significance Assessment should be taken into account when considering the impact of a proposal, *“to avoid conflict between the heritage asset’s conservation and any aspect of the proposal”*. This paragraph therefore results in the need for an analysis of the impact of a proposed development on the asset’s relative significance, in the form of a Heritage Impact Assessment.
- 2.6 Paragraph 193 requires that *“When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.”*
- 2.7 It is then clarified that any harm to the significance of a designated heritage asset, either through alteration, destruction or development within its setting, should require, *“clear and convincing justification”* (Paragraph 194). This paragraph outlines that substantial harm to grade II listed heritage assets should be exceptional, rising to ‘wholly exceptional’ for those assets of the highest significance such as scheduled monuments, Grade I and grade II* listed buildings or registered parks and gardens as well as World Heritage Sites.

- 2.8 In relation to harmful impacts or the loss of significance resulting from a development proposal, Paragraph 195 states the following:

“Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- a. the nature of the heritage asset prevents all reasonable uses of the site; and*
- b. no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and*
- c. conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and*
- d. the harm or loss is outweighed by the benefit of bringing the site back into use.”*

- 2.9 The NPPF therefore requires a balance to be applied in the context of heritage assets, including the recognition of potential benefits accruing from a development. In the case of proposals which would result in *“less than substantial harm”*, paragraph 196 provides the following:

“Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including, where appropriate, securing its optimum viable use.”

- 2.10 It is also possible for proposals, where suitably conceived and designed, to result in no harm to the significance of heritage assets.
- 2.11 In the case of non-designated heritage assets, Paragraph 197 requires a Local Planning Authority to make a *“balanced judgement”* having regard to the scale of any harm or loss and the significance of the heritage asset.
- 2.12 The NPPF therefore recognises the need to clearly identify relative significance at an early stage and then to judge the impact of development proposals in that context.
- 2.13 With regard to Conservation Areas and the settings of heritage assets, paragraph 200 requires Local Planning Authorities to look for opportunities for new development, enhancing or better revealing their significance. Whilst it is noted that not all elements of a Conservation Area will necessarily contribute to its significance, this paragraph states that *“proposals that preserve those elements of a setting that make a positive contribution to the asset (or better reveal its significance) should be treated favourably.”*

Planning Practice Guidance (PPG)

- 2.14 The Planning Practice Guidance (PPG) was updated on 23 July 2019 and is a companion to the NPPF, replacing a large number of foregoing Circulars and other supplementary guidance. It is planned that this document will be updated to reflect the revised NPPF in due course however the following guidance remains relevant.
- 2.15 In relation to non-designated heritage assets, the PPG explains the following:
- “Non-designated heritage assets are buildings, monuments, sites, places, areas or landscapes identified by plan-making bodies as having a degree of heritage significance meriting consideration in planning decisions, but which do not meet the criteria for designated heritage assets.” (Paragraph: 039 Reference ID: 18a-039-20190723)*

- 2.16 It goes on to clarify that: “A substantial majority of buildings have little or no heritage significance and thus do not constitute heritage assets. Only a minority have enough heritage significance to merit identification as non-designated heritage assets.”
- 2.17 This statement explains the need to be judicious in the identification of value and the extent to which this should be applied as a material consideration and in accordance with Paragraph 197.

Historic England ‘Conservation Principles: Policies and Guidance’ 2008



- 2.18 Historic England sets out in this document a logical approach to making decisions and offering guidance about all aspects of England’s historic environment, including changes affecting significant places. The guide sets out six high-level principles:
- *“The historic environment is a shared resource*
 - *Everyone should be able to participate in sustaining the historic environment*
 - *Understanding the significance of places is vital*
 - *Significant places should be managed to sustain their values*
 - *Decisions about change must be reasonable, transparent and consistent*
 - *Documenting and learning from decisions is essential”*
- 2.19 ‘Significance’ lies at the core of these principles, the sum of all the heritage values attached to a place, be it a building, an archaeological site or a larger historic area such as a whole village or landscape. The document sets out how heritage values can be grouped into four categories:
- **“Evidential value:** *the potential of a place to yield evidence about past human activity*
 - **Historic value:** *the ways in which past people, events and aspects of life can be connected through a place to the present – it tends to be illustrative or associative.*
 - **Aesthetic value:** *the ways in which people draw sensory and intellectual stimulation from a place*
 - **Communal value:** *the meanings of a place for the people who relate to it, or for whom it figures in their collective experience or memory”.*
- 2.20 It states that:
- “New work or alteration to a significant place should normally be acceptable if:*

- a. There is sufficient information comprehensively to understand the impacts of the proposal on the significance of the place;*
- b. the proposal would not materially harm the values of the place, which, where appropriate, would be reinforced or further revealed;*
- c. the proposals aspire to a quality of design and execution which may be valued now and in the future;*
- d; the long-term consequences of the proposals can, from experience, be demonstrated to be benign, or the proposals are designed not to prejudice alternative solutions in the future” (Page 58)”.*

Historic England The Historic Environment and Site Allocations in Local Plan Advice Note 3 (October 2015)

- 2.21 This advice note provides information on evidence gathering and site allocation policies to ensure that heritage considerations are fully integrated into site allocation processes.
- 2.22 It provides a site selection methodology in stepped stages:

“STEP 1 Identify which heritage assets are affected by the potential site allocation

- *Informed by the evidence base, local heritage expertise and, where needed, site surveys*
- *Buffer zones and set distances can be a useful starting point but may not be appropriate or sufficient in all cases Heritage assets that lie outside of these areas may also need identifying and careful consideration.*

STEP 2 Understand what contribution the site (in its current form) makes to the significance of the heritage asset(s) including:

- *Understanding the significance of the heritage assets, in a proportionate manner, including the contribution made by its setting considering its physical surroundings, the experience of the asset and its associations (e.g. cultural or intellectual)*
- *Understanding the relationship of the site to the heritage asset, which is not solely determined by distance or inter-visibility (for example, the impact of noise, dust or vibration)*
- *Recognising that additional assessment may be required due to the nature of the heritage assets and the lack of existing information*
- *For a number of assets, it may be that a site makes very little or no contribution to significance.*

STEP 3 Identify what impact the allocation might have on that significance, considering:

- *Location and siting of development e.g. proximity, extent, position, topography, relationship, understanding, key views*

- *Form and appearance of development e.g. prominence, scale and massing, materials, movement*
- *Other effects of development e.g. noise, odour, vibration, lighting, changes to general character, access and use, landscape, context, permanence, cumulative impact, ownership, viability and communal use*
- *Secondary effects e.g. increased traffic movement through historic town centres as a result of new development*

STEP 4 Consider maximising enhancements and avoiding harm through:

- *Maximising enhancement*
- *Public access and interpretation*
- *Increasing understanding through research and recording*
- *Repair/regeneration of heritage assets*
- *Removal from Heritage at Risk Register*
- *Better revealing of significance of assets e.g. through introduction of new viewpoints and access routes, use of appropriate materials, public realm improvements, shop front design*
- *Avoiding Harm*
- *Identifying reasonable alternative sites*
- *Amendments to site boundary, quantum of development and types of development*
- *Relocating development within the site*
- *Identifying design requirements including open space, landscaping, protection of key views, density, layout and heights of buildings*
- *Addressing infrastructure issues such as traffic management*

STEP 5 Determine whether the proposed site allocation is appropriate in light of the NPPF's tests of soundness

- *Positively prepared in terms of meeting objectively assessed development and infrastructure needs where it is reasonable to do so, and consistent with achieving sustainable development (including the conservation of the historic environment)*
- *Justified in terms of any impacts on heritage assets, when considered against reasonable alternative sites and based on proportionate evidence*
- *Effective in terms of deliverability, so that enhancement is maximised and harm minimised*
- *Consistent with national policy in the NPPF, including the need to conserve heritage assets in a manner appropriate to their significance*

Decisions should be clearly stated and evidenced within the Local Plan, particularly where site allocations are put forward where some degree of harm cannot be avoided, and be consistent with legislative requirement."

Historic England The Historic Environment in Local Plans Historic Environment Good Practice Advice (GPA) in Planning Note 1 (March 2015)

- 2.23 This advice note “emphasises that all information requirements and assessment work in support of plan-making and heritage protection needs to be proportionate to the significance of the heritage assets affected and the impact on the significance of those heritage assets. At the same time, those taking decisions need sufficient information to understand the issues and formulate balanced policies” (Page 1).

Historic England Advice Note 2 ‘Making Changes to Heritage Assets’ (February 2016)

- 2.24 This document provides advice in relation to aspects of addition and alteration to heritage assets:

“The main issues to consider in proposals for additions to heritage assets, including new development in conservation areas, aside from NPPF requirements such as social and economic activity and sustainability, are proportion, height, massing, bulk, use of materials, durability and adaptability, use, enclosure, relationship with adjacent assets and definition of spaces and streets, alignment, active frontages, permeability and treatment of setting” (paragraph 41).

Historic England: Historic Environment Good Practice Advice (GPA) in Planning Note 2 ‘Managing Significance in Decision-Taking in the Historic Environment’ (March 2015)

- 2.25 This advice note sets out clear information to assist all relevant stake holders in implementing historic environment policy in the NPPF (NPPF) and the related guidance given in the Planning Practice Guidance (PPG). These include: *“assessing the significance of heritage assets, using appropriate expertise, historic environment records, recording and furthering understanding, neglect and unauthorised works, marketing and design and distinctiveness” (para 1).*
- 2.26 Paragraph 52 discusses ‘Opportunities to enhance assets, their settings and local distinctiveness’ that encourages development: *“Sustainable development can involve seeking positive improvements in the quality of the historic environment. There will not always be opportunities to enhance the significance or improve a heritage asset but the larger the asset the more likely there will be. Most conservation areas, for example, will have sites within them that could add to the character and value of the area through development, while listed buildings may often have extensions or other alterations that have a negative impact on the significance. Similarly, the setting of all heritage assets will frequently have elements that detract from the significance of the asset or hamper its appreciation”.*

Historic England The Setting of Heritage Assets Historic Environment Good Practice Advice (GPA) in Planning (second Edition) Note 3 (December 2017)

- 2.27 This document presents guidance on managing change within the settings of heritage assets, including archaeological remains and historic buildings, sites, areas and landscapes. It gives general advice on understanding setting, and how it may contribute to the significance of heritage assets and allow that significance to be appreciated, as well as advice on how views contribute to setting. The suggested staged approach to taking decisions on setting can also be used to assess the contribution of views to the significance of heritage assets.
- 2.28 Page 2, states that *“the extent and importance of setting is often expressed by reference to visual considerations. Although views of or from an asset will play an important part, the way in which we experience an asset in its setting is also influenced by other environmental*

factors such as noise, dust and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places.”

- 2.29 The document goes on to set out ‘A staged approach to proportionate decision taking’ provides detailed advice on assessing the implications of development proposals and recommends the following broad approach to assessment, undertaken as a series of steps that apply equally to complex or more straightforward cases:
- “Step 1 - identify which heritage assets and their settings are affected;
 - Step 2 - Assess the degree to which these settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated;
 - Step 3 - assess the effects of the proposed development, whether beneficial or harmful, on that significance or on the ability to appreciate it;
 - Step 4 - explore ways to maximise enhancement and avoid or minimizing harm;
 - Step 5 - make and document the decision and monitor outcomes.” (page 8)

Historic England Analysing Significance in Heritage Assets Advice Note 12 (October 2019)

- 2.30 This document provides guidance on the NPPF requirement for applicants to describe heritage significance in order to aid local planning authorities’ decision making. It reiterates the importance of understanding the significance of heritage assets, in advance of developing proposals. This advice note outlines a staged approach to decision-making in which assessing significance precedes the design and also describes the relationship with archaeological desk-based assessments and field evaluations, as well as with Design and Access Statements.
- 2.31 The advice in this document, in accordance with the NPPF, emphasises that the level of detail in support of applications for planning permission and listed building consent should be no more than is necessary to reach an informed decision, and that activities to conserve the asset(s) need to be proportionate to the significance of the heritage asset(s) affected and the impact on that significance. This advice also addresses how an analysis of heritage significance could be set out before discussing suggested structures for a statement of heritage significance.

Local Policy

Welwyn Hatfield District Plan

Policy R25-Works to Listed Building

- 2.32 Permission will be refused for any proposal which would adversely affect the historic character or architectural quality of a Listed Building or its setting. Listed Building Consent will not be granted for any extensions or external or internal alterations to buildings of special architectural or historic importance unless all of the following criteria are satisfied:
- (i) New works respect the character, appearance, and setting of the building in terms of design, scale and materials;
 - (ii) Architectural or historic features which are important to the character and appearance of the building (including internal features) are retained unaltered;
 - (iii) The historic form and structural integrity of the building are retained; and

- (iv) Full detailed drawings of the proposed works are submitted with the application.

Policy D1: Quality of Design

- 2.33 The Council will require the standard of design in all new development to be of a high quality. The design of new development should incorporate the design principles and policies in the Plan and the guidance contained in the Supplementary Design Guidance.

Policy D2: Character and Context

- 2.34 The Council will require all new development to respect and relate to the character and context of the area in which it is proposed. Development proposals should as a minimum maintain, and where possible, should enhance or improve the character of the existing area.

Policy D6: Legibility

- 2.35 The Council will require all new development to enhance and contribute to the legibility of the development itself and of the area in which it is located.

Broadwater Road West Supplementary Planning Document (December 2008)

- 2.36 This Supplementary Planning Document (SPD) outlines the Council's vision for the future of Broadwater Road West and sets out a masterplan to guide and promote the comprehensive redevelopment of this key site. It should be noted that the site itself was not assessed as part of the proposed areas for redevelopment.
- 2.37 The Council's vision for Broadwater Road West is, "To deliver an energetic and pioneering scheme of development which integrates the spirit of the garden city with the very best of high quality 21st Century design, seizing the opportunity to enhance the local environment and create a sustainable, supported neighbourhood of an appropriate scale, which successfully integrates with the local community."
- 2.38 "opportunities exist to: Improve the bridge link to the Howard Centre to improve pedestrian links with the town centre; Enhance the East/West link across the site via Hyde Way; Maximise the site's accessible location and good road and public transport connections; Redevelop the Cereal Partners site using the silos as a landmark feature; Provide a network of usable green spaces on the site; Support business incubation at the Bio Park through adjacent new space; Emphasise the site's industrial character and develop taller buildings on the site; Incorporate mixed use blocks; Create new hub around public space; Create a highly sustainable 21st century development; Provide renewables and a CHP on the site; Provide a safe and crime free environment; Improve the current access route to the railway line used by Network Rail for maintenance work; Uplift the quality of development in Welwyn Garden City; Provide for the leisure/ cultural and community needs/ demands in the town; Emphasise the landmark buildings on the site to promote legibility; and Integrate the site into the surrounding area."

Building Height

- 2.39 "Buildings on the site should be of excellent architectural quality and designed in full cognisance of their likely impact on their immediate surroundings as well as the wider

setting. The main two listed structures of the CPUK silos and the Roche reception building should be incorporated as landmarks in the overall structure of development and the building heights of all blocks should have regard to the setting of these buildings. The silos, in particular, should stand out as the main landmark on the skyline and therefore no new development should adversely affect this role.

- 2.40 It is considered that lower rise buildings should generally be accommodated at the southern end of the site, responding to the adjacent residential character areas that the development will need to respect. Medium rise buildings should make up the majority of the site, particularly through the central band of the site and where located adjacent to the railway should provide an element of screening whilst seeking to retain views to the silos.
- 2.41 Given the context of the listed buildings, it is generally considered that buildings on the site should not be more than 5 storeys in height. Furthermore, where new build development on the site is proposing development of 5 storeys (or more) the resulting scheme will be assessed with regards to both the contribution that such height could bring and any adverse impacts. In reviewing schemes that include development of 5 storeys (or more) the Council will consider the following criteria - Relationship to context of the site and the wider area Effect on historic context of the site and the wider area Relationship to transport infrastructure Architectural quality of the building Design credibility of the building Sustainable design and construction Contribution to public space and facilities Effect on the local environment and amenity of those in the vicinity of the building Contribution to permeability Provision of a well designed environment including fitness for purpose."

Other Material Considerations

Emerging Local Policy

Welwyn Hatfield Borough Council - Draft Local Plan Proposed Submission August 2016

Policy SADM 15 - Heritage

- 2.42 "Proposals which affect designated heritage assets and the wider historic environment should consider the following:
- 2.43 The potential to sustain and enhance the heritage asset and historic environment in a manner appropriate to its function and significance. Successive small scale changes that lead to a cumulative loss or harm to the significance of the asset or historic environment should be avoided. Proposals should respect the character, appearance and setting of the asset and historic environment in terms of design, scale, materials and impact on key views.
- 2.44 Architectural or historic features which are important to the character and appearance of the asset (including internal features) should be retained unaltered. The historic form and structural integrity of the asset are retained; and Appropriate recording of the fabric or features that are to be lost or compromised takes place and is deposited into the Historic Environment Record.
- 2.45 A Heritage Statement, Heritage Impact Assessment and/or Archaeological Assessment will be required if the scale and nature of the proposal are likely to have an impact on the significance of all or part of the asset. Permission for proposals that result in substantial harm to the significance of a designated heritage asset, including Conservation Areas, will be exceptional or wholly exceptional in accordance with national policy and guidance.

- 2.46 Proposals that result in less than substantial harm to the significance of a designated heritage asset will also be refused unless the need for, and benefits of, the development in that location significantly outweigh that harm and the desirability of preserving the asset, and all feasible solutions to avoid and mitigate that harm have been fully implemented.
- 2.47 Proposals that result in harm to the significance of other heritage assets will be resisted unless the need for, and benefits of, the development in that location clearly outweigh that harm, taking account of the asset's significance and importance, and all feasible solutions to avoid and mitigate that harm have been fully implemented.

Shredded Wheat Factory Consented applications (6/2018/0171/MAJ, 6/2019/1347/FULL, 6/2019/0826/LB)

- 2.48 Consented applications for the redevelopment of the Shredded Wheat Factory and surrounding area have been granted. This includes Listed Building Consent for alterations to the Grade II listed building. Proposals within the consented scheme include the demolition of later additions as well additional height in the form of circulation space. The proposals included a mixed height across the site going up to nine storeys. These alterations were supported by Historic England, who referenced the need to preserve the 'clarity' of the original design.

Former Roche Products Site (ref. N6/2010/01776/MA) and conversion of the listed Roche building to residential (ref. N6/2016/1882/FUL).

- 2.49 A consented application saw the clearance around the listed Roche building and conversion of the listed building to residential.

3.0 Methodology

Heritage Assets

- 3.1 A heritage asset is defined within the National Planning Policy Framework 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. It includes designated heritage assets and assets identified by the local planning authority (including local listing)”* (NPPF Annex 2: Glossary).
- 3.2 To be considered a heritage asset *“an asset must have some meaningful archaeological, architectural, artistic, historical, social or other heritage interest that gives it value to society that transcends its functional utility. Therein lies the fundamental difference between heritage assets and ordinary assets; they stand apart from ordinary assets because of their significance – the summation of all aspects of their heritage interest.”* (‘Managing Built Heritage: The Role of Cultural Values and Significance’ Stephen Bond and Derek Worthing, 2016.)
- 3.3 ‘Designated’ assets have been identified under the relevant legislation and policy including, but not limited to: World Heritage Sites, Scheduled Monuments, Listed Buildings, and Conservation Areas. ‘Non-designated’ heritage assets are assets which fall below the national criteria for designation.
- 3.4 The absence of a national designation should not be taken to mean that an asset does not hold any heritage interest. The Planning Policy Guidance (PPG) states that *“non-designated heritage assets are buildings, monuments, sites, places, areas or landscapes identified by plan-making bodies as having a degree of heritage significance meriting consideration in planning decisions, but which do not meet the criteria for designated heritage assets.”* (Paragraph: 039 Reference ID: 18a-039-20190723)
- 3.5 The PPG goes on to clarify that *“a substantial majority of buildings have little or no heritage significance and thus do not constitute heritage assets. Only a minority have enough heritage significance to merit identification as non-designated heritage assets.”*

Meaning of Significance

- 3.6 The concept of significance was first expressed within the 1979 Burra Charter (Australia ICOMOS, 1979). This charter has periodically been updated to reflect the development of the theory and practice of cultural heritage management, with the current version having been adopted in 2013. It defines cultural significance as the *“aesthetic, historic, scientific, social or spiritual value for past, present or future generations. Cultural significance is embodied in the place itself, its fabric, setting, use, associations, meanings, records, related places and related objects. Places may have a range of values for different individuals or groups”* (Page 2, Article 1.2)
- 3.7 The NPPF (Annex 2: Glossary) also defines significance as *“the value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting.”*
- 3.8 Significance can therefore be considered to be formed by *“the collection of values associated with a heritage asset.”* (‘Managing Built Heritage: The Role of Cultural Values and Significance’ Stephen Bond and Derek Worthing, 2016.)

Assessment of Significance/Value

- 3.9 It is important to be proportionate in assessing significance as required in both national policy and guidance as set out in paragraph 189 of NPPF.
- 3.10 The Historic England document 'Conservation Principles' states that "*understanding a place and assessing its significance demands the application of a systematic and consistent process, which is appropriate and proportionate in scope and depth to the decision to be made, or the purpose of the assessment.*"
- 3.11 The document goes on to set out a process for assessment of significance, but it does note that not all of the stages highlighted are applicable to all places/ assets.
- Understanding the fabric and evolution of the asset;
 - Identify who values the asset, and why they do so;
 - Relate identified heritage values to the fabric of the asset;
 - Consider the relative importance of those identified values;
 - Consider the contribution of associated objects and collections;
 - Consider the contribution made by setting and context;
 - Compare the place with other assets sharing similar values;
 - Articulate the significance of the asset.
- 3.12 At the core of this assessment is an understanding of the value/significance of a place. There have been numerous attempts to categorise the range of heritage values which contribute to an asset's significance. Historic England's 'Conservation Principles' sets out a grouping of values as follows:

Evidential value – '*derives from the potential of a place to yield evidence about past human activity...Physical remains of past human activity are the primary source of evidence about the substance and evolution of places, and of the people and cultures that made them...The ability to understand and interpret the evidence tends to be diminished in proportion to the extent of its removal or replacement.*' (Page 28)

Aesthetic Value – '*Aesthetic values can be the result of the conscious design of a place, including artistic endeavour. Equally, they can be the seemingly fortuitous outcome of the way in which a place has evolved and been used over time. Many places combine these two aspects... Aesthetic values tend to be specific to a time cultural context and appreciation of them is not culturally exclusive*'. (Pages 30-31)

Historic Value – '*derives from the ways in which past people, events and aspects of life can be connected through a place to the present. It tends to be illustrative or associative... Association with a notable family, person, event, or movement gives historical value a particular resonance...The historical value of places depends upon both sound identification and direct experience of fabric or landscape that has survived from the past, but is not as easily diminished by change or partial replacement as evidential value. The authenticity of a place indeed often lies in visible evidence of change as a result of people responding to changing circumstances. Historical values are harmed only to the extent that adaptation has obliterated or concealed them, although completeness does tend to strengthen illustrative value*'. (Pages 28-30)

Communal Value – “Commemorative and symbolic values reflect the meanings of a place for those who draw part of their identity from it, or have emotional links to it... Social value is associated with places that people perceive as a source of identity, distinctiveness, social interaction and coherence. Some may be comparatively modest, acquiring communal significance through the passage of time as a result of a collective memory of stories linked to them... They may relate to an activity that is associated with the place, rather than with its physical fabric... Spiritual value is often associated with places sanctified by longstanding veneration or worship, or wild places with few obvious signs of modern life. Their value is generally dependent on the perceived survival of the historic fabric or character of the place, and can be extremely sensitive to modest changes to that character, particularly to the activities that happen there”. (Pages 31-32)

- 3.13 Value-based assessment should be flexible in its application, it is important not to oversimplify an assessment and to acknowledge when an asset has a multi-layered value base, which is likely to reinforce its significance.

Contribution of Setting/context to Significance

- 3.14 In addition to the above values, the setting of a heritage asset can also be a fundamental contributor to its significance - although it should be noted that ‘setting’ itself is not a designation. The value of setting lies in its contribution to the significance of an asset. For example, there may be instances where setting does not contribute to the significance of an asset at all.
- 3.15 Historic England’s Conservation Principles defines *setting* as “an established concept that relates to the surroundings in which a place is experienced, its local context, embracing present and past relationships to the adjacent landscape.”
- 3.16 It goes on to state that “context embraces any relationship between a place and other places. It can be, for example, cultural, intellectual, spatial or functional, so any one place can have a multi-layered context. The range of contextual relationships of a place will normally emerge from an understanding of its origins and evolution. Understanding context is particularly relevant to assessing whether a place has greater value for being part of a larger entity, or sharing characteristics with other places” (page 39).
- 3.17 In order to understand the role of setting and context to decision-making, it is important to have an understanding of the origins and evolution of an asset, to the extent that this understanding gives rise to significance in the present. Assessment of these values is not based solely on visual considerations but may lie in a deeper understanding of historic use, ownership, change or other cultural influence – all or any of which may have given rise to current circumstances and may hold a greater or lesser extent of significance.
- 3.18 The importance of setting depends entirely on the contribution it makes to the significance of the heritage asset or its appreciation. It is important to note that impacts that may arise to the setting of an asset do not, necessarily, result in direct or equivalent impacts to the significance of that asset(s).

Assessing Impact

- 3.19 It is evident that the significance/value of any heritage asset(s) requires clear assessment to provide a context for, and to determine the impact of, development proposals. Impact on that value or significance is determined by first considering the sensitivity of the receptors identified which is best expressed by using a hierarchy of value levels.

- 3.20 There are a range of hierarchical systems for presenting the level of significance in use; however, the method chosen for this project is based on the established 'James Semple Kerr method' which has been adopted by Historic England, in combination with the impact assessment methodology for heritage assets within the *Design Manual for Roads and Bridges* (DMRB: HA208/13) published by the Highways Agency, Transport Scotland, the Welsh Assembly Government and the department for Regional Development Northern Ireland. This 'value hierarchy' has been subject to scrutiny in the UK planning system, including Inquiries, and is the only hierarchy to be published by a government department.
- 3.21 The first stage of our approach is to carry out a thoroughly researched assessment of the significance of the heritage asset, in order to understand its value:

SIGNIFICANCE	EXAMPLES
Very High	World Heritage Sites, Listed Buildings, Scheduled Monuments and Conservation Areas of outstanding quality, or built assets of acknowledged exceptional or international importance, or assets which can contribute to international research objectives. Registered Parks & Gardens, historic landscapes and townscapes of international sensitivity.
High	World Heritage Sites, Listed Buildings, Scheduled Monuments, Conservation Areas and built assets of high quality, or assets which can contribute to international and national research objectives. Registered Parks & Gardens, historic landscapes and townscapes which are highly preserved with excellent coherence, integrity, time-depth, or other critical factor(s).
Good	Listed Buildings, Scheduled Monuments, Conservation Areas and built assets (including locally listed buildings and non-designated assets) with a strong character and integrity which can be shown to have good qualities in their fabric or historical association, or assets which can contribute to national research objectives. Registered Parks & Gardens, historic landscapes and townscapes of good level of interest, quality and importance, or well preserved and exhibiting considerable coherence, integrity time-depth or other critical factor(s).
Medium/ Moderate	Listed Buildings, Scheduled Monuments, Conservation Areas and built assets (including locally listed buildings and non-designated assets) that can be shown to have moderate qualities in their fabric or historical association. Registered Parks & Gardens, historic landscapes and townscapes with reasonable coherence, integrity, time-depth or other critical factor(s).
Low	Listed Buildings, Scheduled Monuments and built assets (including locally listed buildings and non-designated assets) compromised by poor preservation integrity and/or low original level of quality of low survival of contextual associations but with potential to contribute to local research objectives. Registered Parks & Gardens, historic landscapes and townscapes with modest sensitivity or whose sensitivity is limited by poor preservation, historic integrity and/or poor survival of contextual associations.
Negligible	Assets which are of such limited quality in their fabric or historical association that this is not appreciable. Historic landscapes and townscapes of limited sensitivity, historic integrity and/or limited survival of contextual associations.
Neutral/ None	Assets with no surviving cultural heritage interest. Buildings of no architectural or historical note.

	Landscapes and townscape with no surviving legibility and/or contextual associations, or with no historic interest.
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- 3.22 Once the value/ significance of an asset has been assessed, the next stage is to determine the assets 'sensitivity to change'. The following table sets out the levels of sensitivity to change, which is based upon the vulnerability of the asset, in part or as a whole, to loss of value through change. Sensitivity to change can be applied to individual elements of a building, or its setting, and may differ across the asset.
- 3.23 An asset's sensitivity level also relates to its capacity to absorb change, either change affecting the asset itself or change within its setting (remembering that according to Historic England The Setting of Heritage Assets – Planning Note 3, 'change' does not in itself imply harm, and can be neutral, positive or negative in effect).
- 3.24 Some assets are more robust than others and have a greater capacity for change and therefore, even though substantial changes are proposed, their sensitivity to change or capacity to absorb change may still be assessed as low.

SENSITIVITY	EXPLANATION OF SENSITIVITY
High	High Sensitivity to change occurs where a change may pose a major threat to a specific heritage value of the asset which would lead to substantial or total loss of heritage value.
Moderate	Moderate sensitivity to change occurs where a change may diminish the heritage value of an asset, or the ability to appreciate the heritage value of an asset.
Low	Low sensitivity to change occurs where a change may pose no appreciable threat to the heritage value of an asset.

- 3.25 Once there is an understanding of the sensitivity an asset holds, the next stage is to assess the 'magnitude' of the impact that any proposed works may have. Impacts may be considered to be adverse, beneficial or neutral in effect and can relate to direct physical impacts, impacts on its setting, or both. Impact on setting is measured in terms of the effect that the impact has on the significance of the asset itself – rather than setting itself being considered as the asset.

MAGNITUDE OF IMPACT	TYPICAL CRITERIA DESCRIPTORS
Very High	<u>Adverse</u> : Impacts will destroy cultural heritage assets resulting in their total loss or almost complete destruction. <u>Beneficial</u> : The proposals would remove or successfully mitigate existing and significant damaging and discordant impacts on assets; allow for the substantial restoration or enhancement of characteristic features.
High	<u>Adverse</u> : Impacts will damage cultural heritage assets; result in the loss of the asset's quality and integrity; cause severe damage to key characteristic features or elements; almost complete loss of setting and/or context of the asset. The assets

	<p>integrity or setting is almost wholly destroyed or is severely compromised, such that the resource can no longer be appreciated or understood.</p> <p><u>Beneficial:</u> The proposals would remove or successfully mitigate existing damaging and discordant impacts on assets; allow for the restoration or enhancement of characteristic features; allow the substantial re-establishment of the integrity, understanding and setting for an area or group of features; halt rapid degradation and/or erosion of the heritage resource, safeguarding substantial elements of the heritage resource.</p>
Medium	<p><u>Adverse:</u> Moderate impact on the asset, but only partially affecting the integrity; partial loss of, or damage to, key characteristics, features or elements; substantially intrusive into the setting and/or would adversely impact upon the context of the asset; loss of the asset for community appreciation. The assets integrity or setting is damaged but not destroyed so understanding and appreciation is compromised.</p> <p><u>Beneficial:</u> Benefit to, or partial restoration of, key characteristics, features or elements; improvement of asset quality; degradation of the asset would be halted; the setting and/or context of the asset would be enhanced and understanding and appreciation is substantially improved; the asset would be brought into community use.</p>
Minor/Low	<p><u>Adverse:</u> Some measurable change in assets quality or vulnerability; minor loss of or alteration to, one (or maybe more) key characteristics, features or elements; change to the setting would not be overly intrusive or overly diminish the context; community use or understanding would be reduced. The assets integrity or setting is damaged but understanding and appreciation would only be diminished not compromised.</p> <p><u>Beneficial:</u> Minor benefit to, or partial restoration of, one (maybe more) key characteristics, features or elements; some beneficial impact on asset or a stabilisation of negative impacts; slight improvements to the context or setting of the site; community use or understanding and appreciation would be enhanced.</p>
Negligible	Barely discernible change in baseline conditions and/or slight impact. This impact can be beneficial or adverse in nature.
Neutral	Some changes occur but the overall effect on the asset and its significance is neutral.
Nil	No change in baseline conditions.

4.0 Townscape Policy and Planning Guidance Background

- 4.1 The Townscape Assessment is prepared with regard to the current best practice documentation including:
- Guidelines for Landscape and Visual Impact Assessment (3rd Edition, 2013), Landscape Institute / Institute of Environmental Management and Assessment;
 - Advice Note 01/11: Photography and photomontage in landscape and visual impact assessment, Landscape Institute;
 - Topic Paper 6, Techniques and Criteria for Judging Capacity and Sensitivity (2003), Countryside Agency / Scottish Natural Heritage;
 - Landscape Character Assessment Guidance for England and Scotland (2002), Countryside Agency / Scottish Natural Heritage;
 - An Approach to Landscape Character Assessment (2014) - Natural England; and
 - Advice Note 4: Tall Buildings (2015), Historic England.
- 4.2 At paragraph 2.7, the Guidelines for Landscape and Visual Impact Assessment (GLVIA3) states that 'Townscape' refers to areas where built form is dominant, and in particular that "townscape means the landscape within the built-up area, including the buildings, the relationship between them, the different types of urban open spaces, including green spaces, and the relationship between buildings and open spaces."
- 4.3 GLVIA3 clarifies that references to the term 'landscape' are synonymous with the term 'townscape'. This Townscape Assessment therefore considers the national, strategic and local planning policy context and accompanying guidance insofar as it relates to townscape and visual matters. This includes:
- National Planning Policy Framework and Planning Practice Guidance**
- 4.4 In order to describe the character of the site and its setting, desk and field survey work is used to identify the key characteristics of the areas identified as being of particular importance, and to describe them as perceived from a number of route corridors.
- 4.5 Townscape elements and features understood and defined as 'character areas' within the environs of the application site are then assessed as appropriate through use of the following criteria:
- Building enclosure and scale (street and block pattern/grain, heights/3D massing, scale and density of buildings, enclosure and street proportions, and boundaries);
 - Movement (accessibility, pedestrianisation, cycle routes, public transport, choice of routes, wayfinding, nodes, gateways, defined paths, edges and mobility for disabled or elderly);

- Buildings (style and condition/quality of architecture, vernacular style, materials, and building frontages);
- Public realm (streetscape materials, street furniture, streetscape clutter, visual contrasts and evidence of vandalism);
- Landmarks (building contextual cues, landmark buildings and focal points);
- Townscape elements (vegetation types, their condition and overall contribution to character,
- private gardens/street trees and their contribution to streetscape and open spaces).

4.6 Typically, townscape character areas comprise designated areas, townscape features, public open spaces, transport routes and distinct land use areas. These character areas are then understood as 'receptors', and their overall value determined using the matrix within the below table. The impact of a proposal can be assessed against this baseline value.

4.7 Viewpoints have also been identified and agreed with the council as individual visual receptors. This impact of the proposals upon these views will be assessed as part of this report, using the 'impact on visual amenity' matrix outlined in Table 2 below.

4.8 The existing and proposed contribution that structures within the site make to the local townscape character, including that of the receptors identified, are then determined using the following matrix as well as described in terms of scale and massing.

VALUE	TYPICAL CRITERIA	TYPICAL SCALE OF IMPORTANCE/ RARITY	TYPICAL EXAMPLES
Exceptional	High importance and rarity. No or limited potential for substitution	International, National	World Heritage site, National Park, AONB, and/or typically a number of Grade I and Grade II* listed buildings or Registered Park and Garden
Major	High importance and rarity. Limited potential for substitution	National, Regional, Local	AONB, Scheduled Monuments, Conservation Area, typically a number of Grade II listed buildings, and/or Registered Park and Gardens
Moderate	Moderate importance and rarity. Limited potential for substitution	Regional, Local	Conservation Area with some negative features, or an undesignated area but value perhaps expressed through non-official publications or demonstrable use

Minor	Minor importance and rarity. Considerable potential for substitution	Local	Areas identified as having some redeeming feature or features and possibly identified for improvement
Poor	Minor importance and rarity	Local	Areas identified for recovery

4.9 The below table shows townscape character and visual amenity magnitude of effect

Magnitude of Effect	Definition
Substantial adverse	The scheme proposal has a significant detrimental effect on the identified visual receptors or results in a major deterioration of the identified townscape character area
Moderate adverse	The scheme proposal has a moderate detrimental effect on the identified visual receptors or fails to contribute to the identified townscape character area
Minor adverse	The scheme proposal has a slight detrimental effect on the identified visual receptors or fails to fully contribute to the identified townscape character area
Negligible/ neutral	The scheme proposal neither contributes to nor detracts from the identified visual receptors or identified townscape character area
Minor beneficial	The scheme proposal has a slight beneficial effect on the identified visual receptors or partly contributes to the identified townscape character area
Moderate beneficial	The scheme proposal has a moderate beneficial effect on the identified visual receptors or contributes to the identified townscape character area
Substantial beneficial	The scheme proposal has a significant beneficial effect on the identified visual receptors or results in a major contribution to the identified townscape character area

6.0 Historic Context

Initial Development

- 6.1 The Garden City movement was founded by Sir Ebenezer Howard in the 1920s following his earlier trial town at Letchworth Garden City.
- 6.2 Creating new towns was a passion of Howards who in the late 19th century felt that he could design a settlement of limited size, planned in advance, surrounded by a permeant belt of agricultural land as a future model for urban development. His main goal was to create 'Garden Cities' that were a cooperative blend of city and nature. The root of Howard's idea was to combine 'the advantages of town and countryside to create a pleasant egalitarian environment.'
- 6.3 These principles underpinned the design for Welwyn Garden City. A key theme throughout the design and planning of Welwyn Garden City was the idea that everything could be accessed within the town; an idea of self-containment. As such Howard planned the town with jobs, services, leisure facilities and housing within a single settlement. This idea was carried through to other "new towns" within the country such a Stevenage, Harlow and Milton Keynes.
- 6.4 Welwyn Garden City however was one of the earlier iterations of the movement and was born from Howard purchasing 1500 acres of farmland near Welwyn in 1919. Following on from this Howard appointed the French-Canadian architect Louis de Soissons as planner and designer in April 1920. Within six weeks De Soissons produced the master plan which was ultimately constructed with slight alterations over the decades.

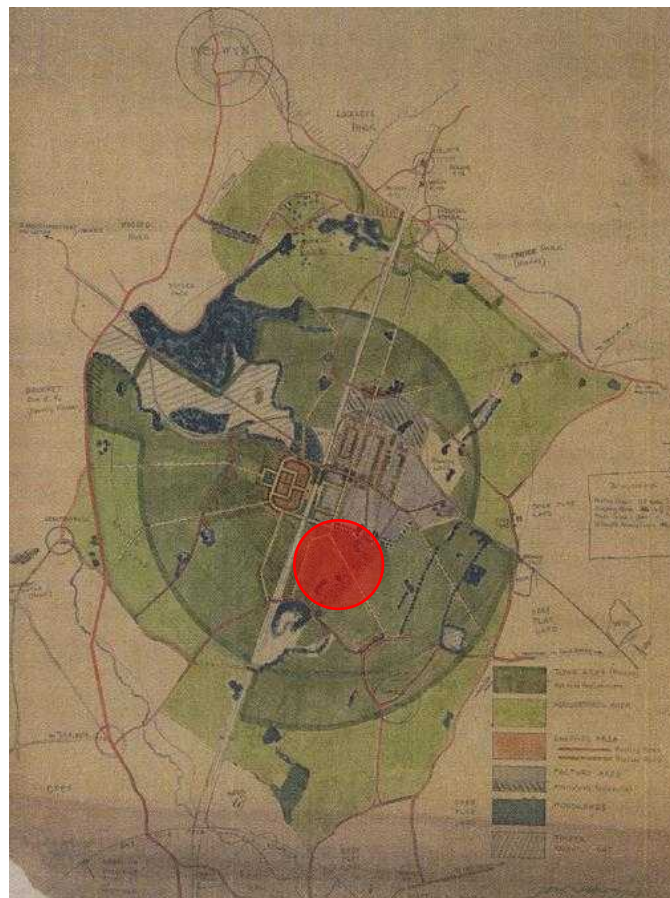


Figure 2- Welwyn Garden City sketch plan by Sir Frederic Osborn (1919). The approximate location of the site is reflected by the red transparency.

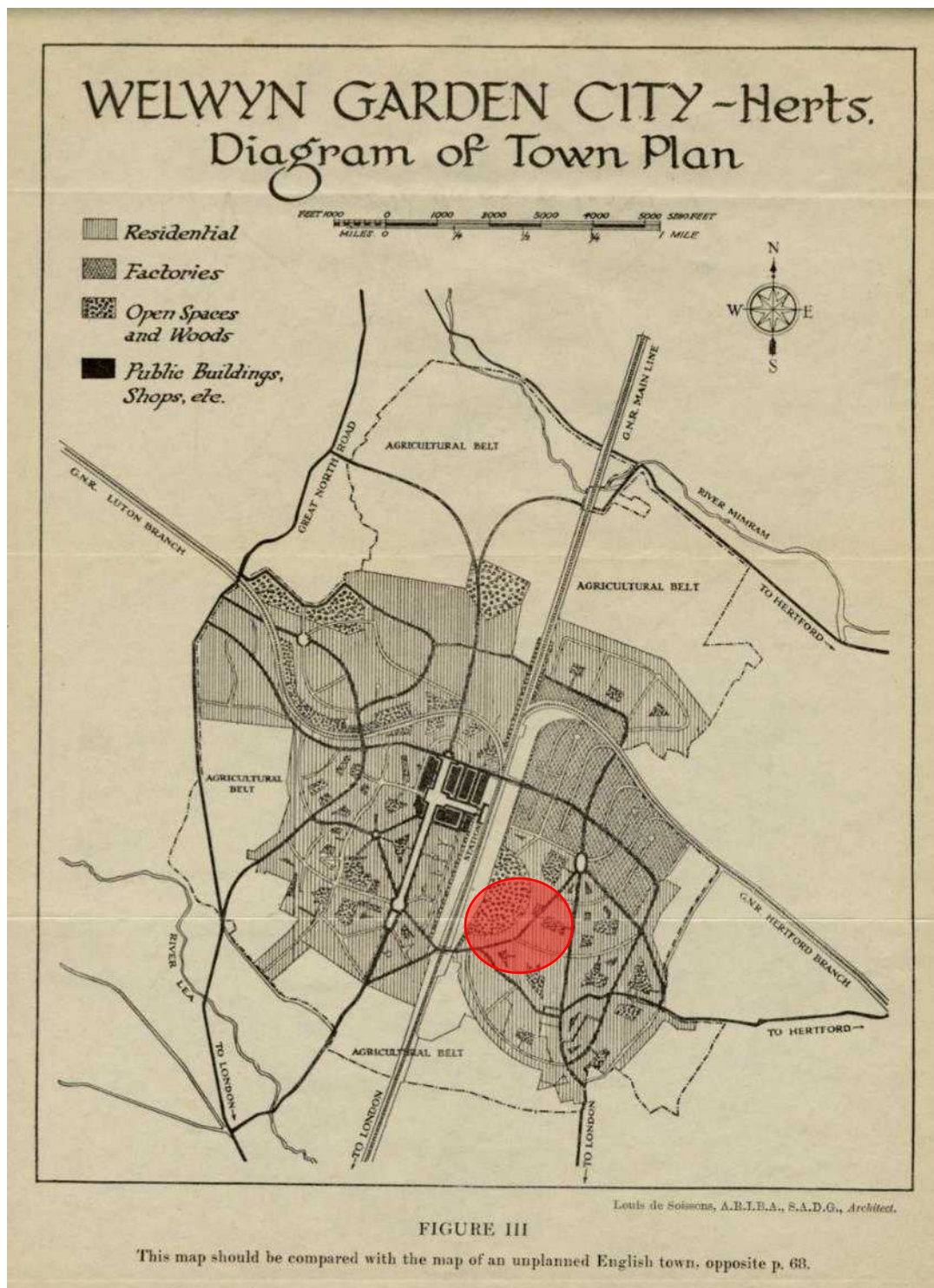


Figure 3- Diagram of Welwyn Garden City Town Plan by Louis de Soissons (1920). Note the zoned area for 'factories' to the east of the railway. The approximate location of site highlighted in red.

- 6.5 The style of the houses and public buildings throughout the Garden City are Neo-Georgian which is a contrary to the Art and Crafts style which was favoured by Unwin and Parker at Letchworth.

It is thought that De Soissons and his associate Arthur Kenyon designed over half the houses within the town, the majority of which are in red brick, but many were constructed of concrete and flat roofs.

- 6.6 The town is laid out in a 'Grand Beaux Arts' tradition with a greensward avenue known as Parkway which at over 60m wide runs through the central area of the town, providing the central axis. The residential streets that surround this central core follow the contours of the land in order to minimise the cost of installing water and sewage services. These streets were carefully landscaped with no more than 12 houses per acre however De Soissons creatively reimaged the cul-de-sac to create singular communities with shared decorative detailing creating identities at street level.

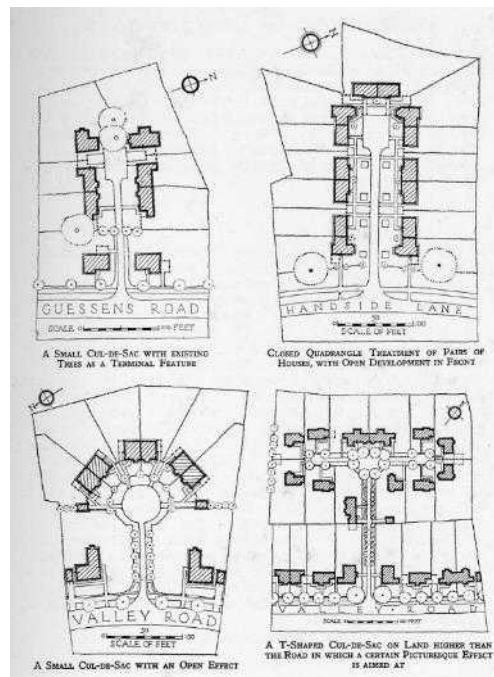


Figure 4-Street layout plan illustrating types of cul-de-sac taken from *The Building of Satellite Towns* by C.B. Purdom

- 6.7 De Soissons planned that all residents would shop in one place and though 'Welwyn Stores' provided initial amenity however commercial pressures of the 20th century have altered this original arrangement. He was also passionate about the reinstatement of trees and green spaces between each of the developments. De Soissons was still on the city board in 1948 when Welwyn Garden City was overtaken by the state and designated as a New Town under the New Towns Act 1946 with neighbouring Hatfield. He remained a key part of the development until his death in 1962.
- 6.8 Over the coming decades various development took place within the town which resulted in the creation of 8 distinct neighbourhoods; Howardsgate, Handside, Panshanger, Hatfield Hyde and Woodall, Digswell, Howlands, Lemsford, Monkswood, Haldens, Parkway and the Town Centre.

The Industrial Zone

- 6.9 A key part of the town's initial design was the desire to allow residents to live close to where they worked. In 1924 De Soissons designed the first and arguably the most important factory in the town for Shredded Wheat which was the first of its kind in England being a mixture of concrete and glass. In 1981 the factory and adjoining silos were listed at Grade II by Historic England.

- 6.10 Other factories were constructed within this expanding 'industrial zone', all approved by De Soissons before they were constructed. This included the International Modernist Grade II Listed Roche Factory, built by Otto Salvisberg in 1937.
- 6.11 The growth of industries in Welwyn Garden City depended on the growth and expansion of the town and population. Apart from the purpose-built factories such as Shredded Wheat and Roche Factory the majority of new factories were housed in Sectional Factory Units built in Bridge Road East, Broadwater Road, Hyde Way and Tewin Road.

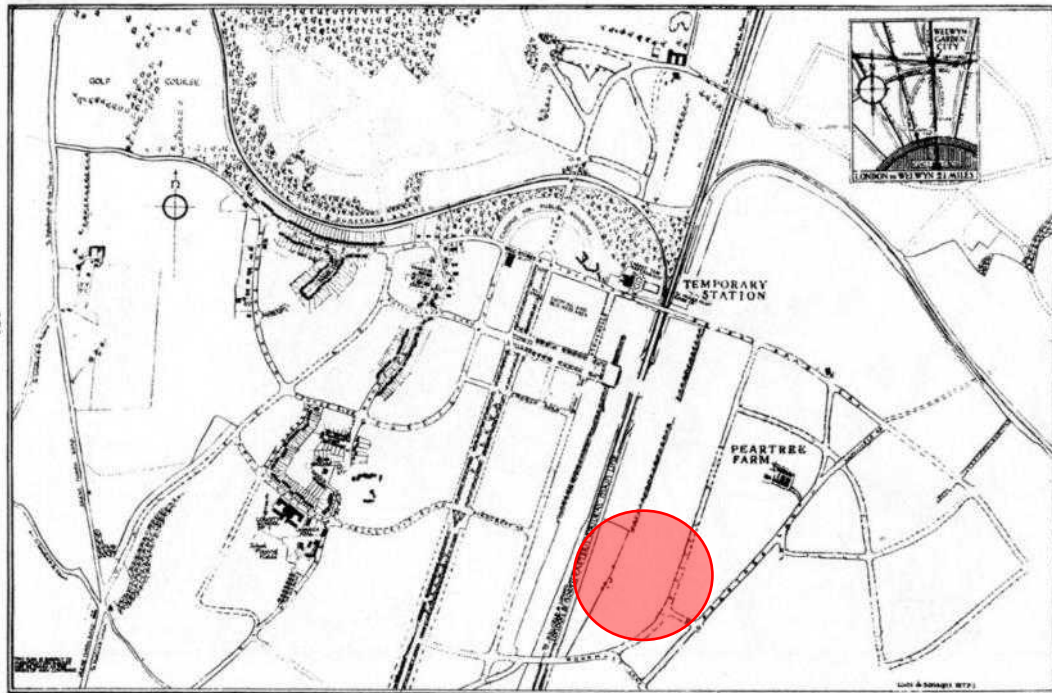


Figure 5 (Above) Map showing development of the factory area of Welwyn Garden City 1922 (approximate location of site outlined in red)

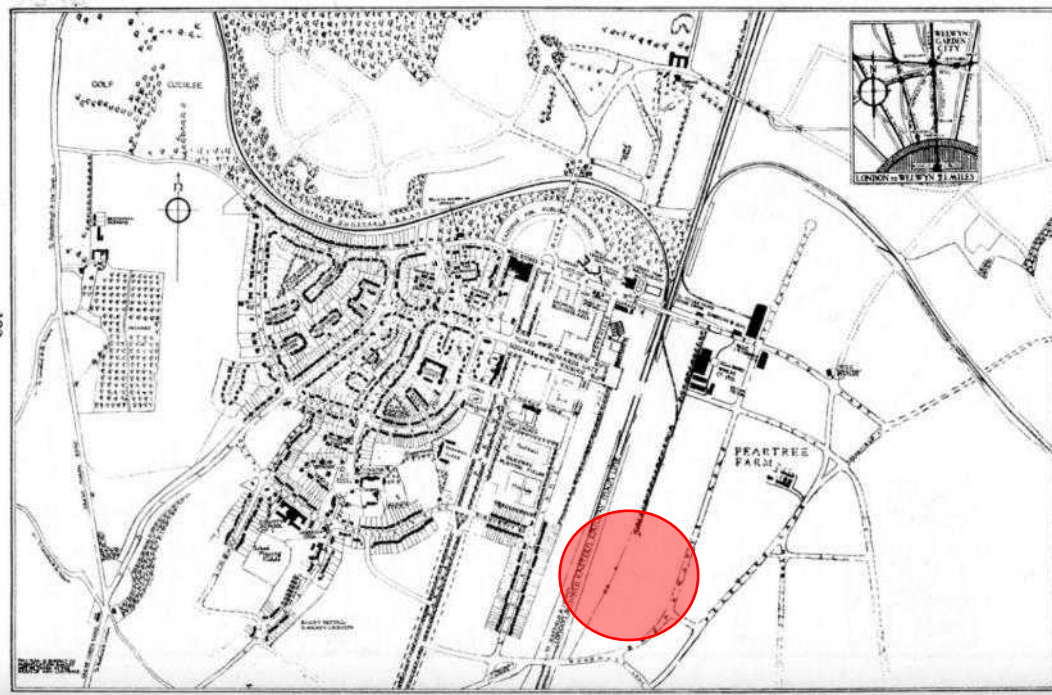


Figure 6 (Below) Map showing development of the factory area of Welwyn Garden City 1926. Residential development is starting to emerge on the west side of the railway line. The first factory (Shredded Wheat) is now present on the map north of the site (approximate location outlined in red)

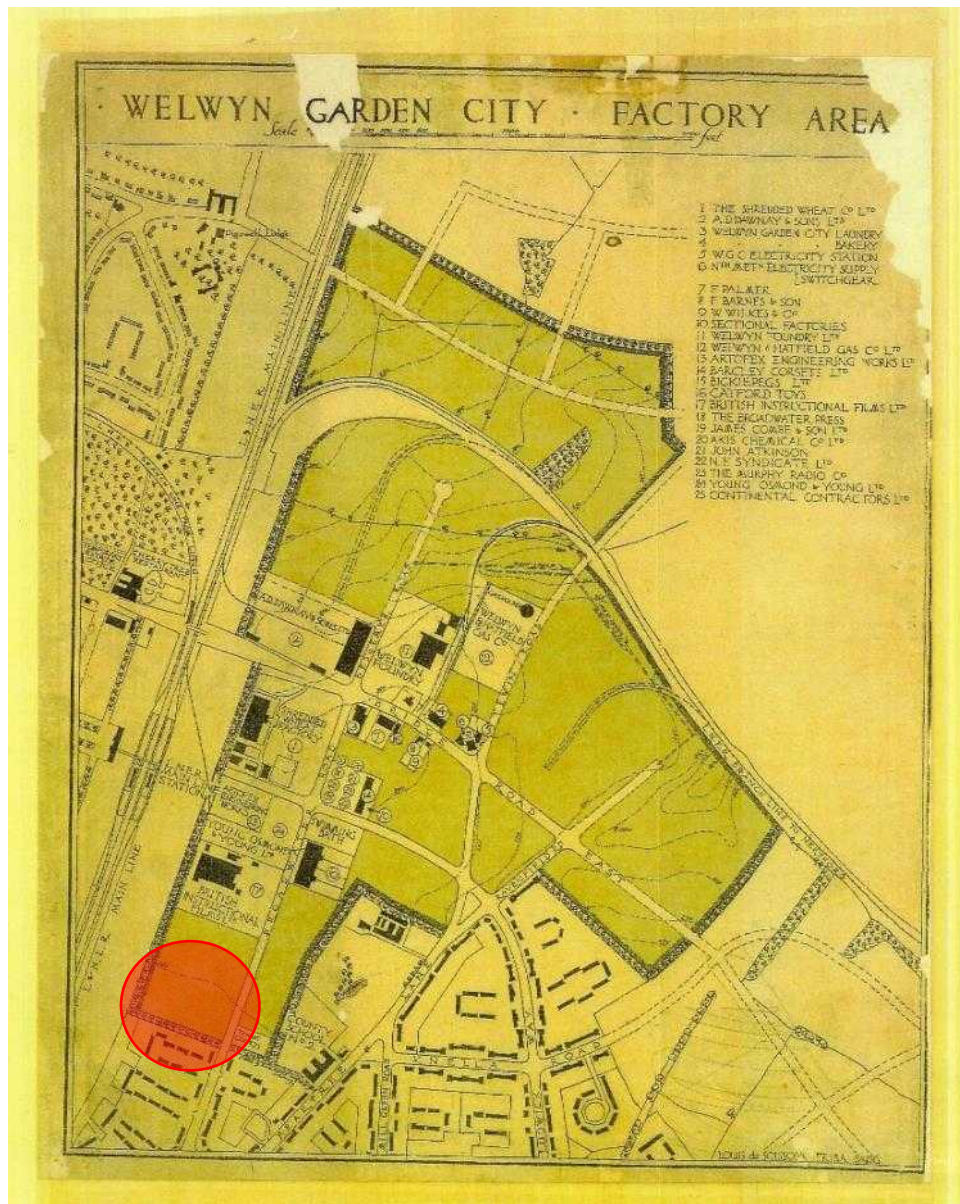


Figure 7- Late 1920s Map of Factory Area (approximate location of the site highlighted in red).

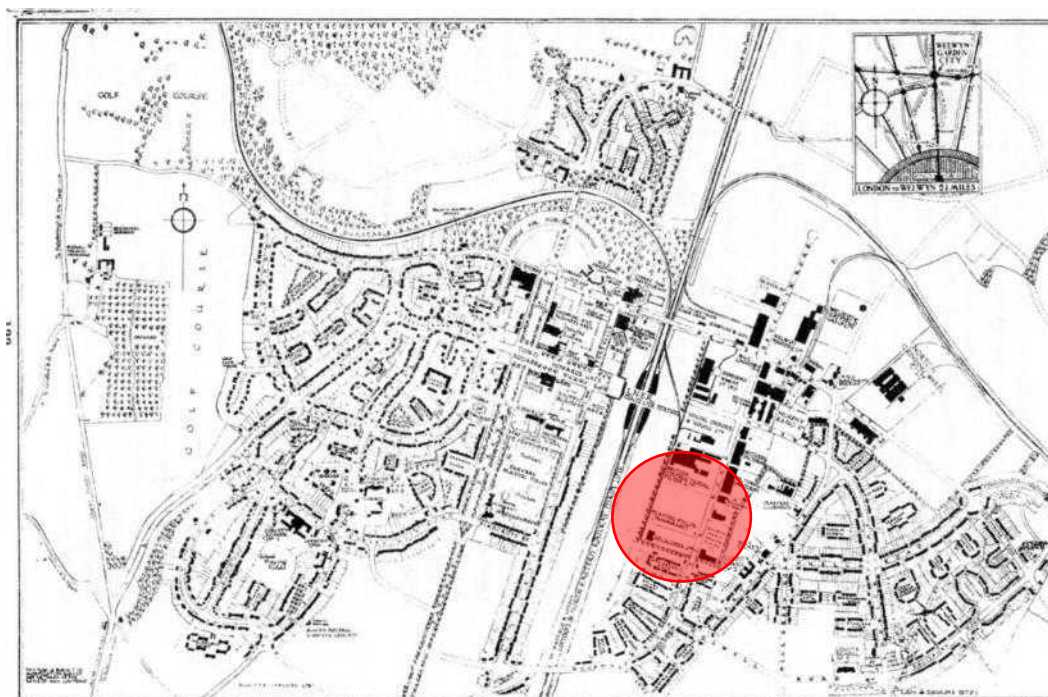


Figure 8- Map showing development of the factory area of Welwyn Garden City 1933. Further factories start to develop around the Shredded Wheat Factory with residential development starting to take form to the east and south of the site (approximate location highlighted in red).

6.12 The following is a quote taken from the Welwyn Garden City Directory 1926;

'The town is planned with an industrial area, which is specially laid out with railway sidings, roads, and public services.

The factory conditions are claimed to be ideal, and the factories are so placed that they have plenty of light and air with convenient access to the residential parts of the town and yet do not interfere with the town's amenities. Indiscriminate factory development will not be permitted in Welwyn Garden City.

The Shredded Wheat Factory is a type of the handsome factory premises of the town. This factory may be visited at certain times.'

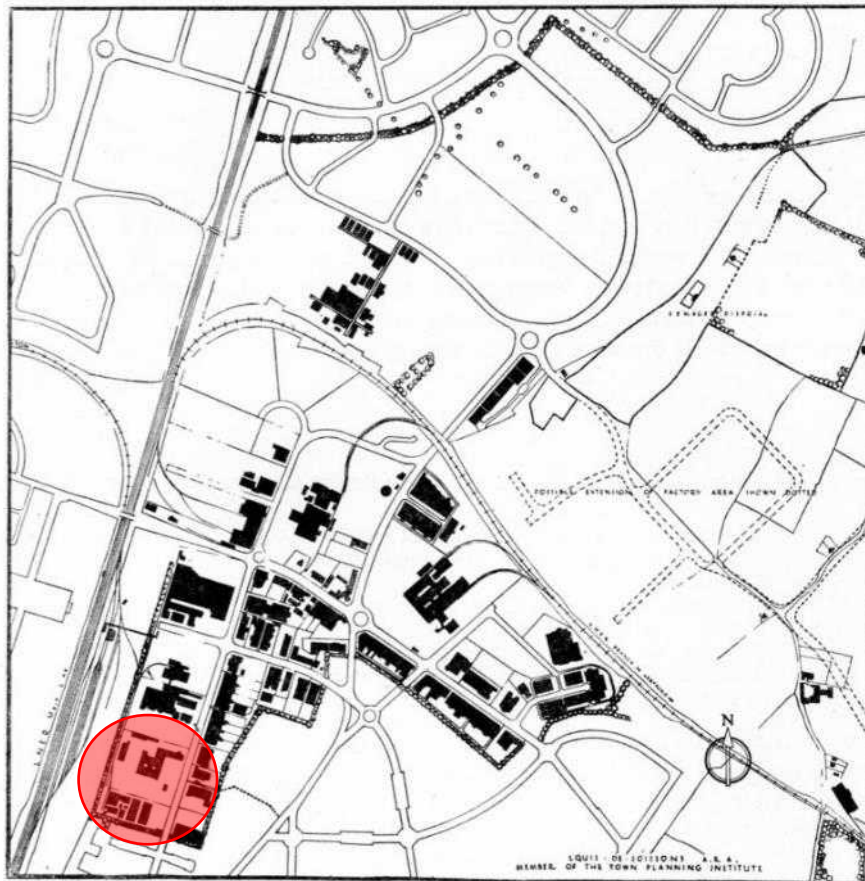


Figure 9- Map of Factory Area in Welwyn Garden City showing development in 1948 (approximate location of site in red)

- 6.13 The most striking building of this period was perhaps the Smith Kline & French (1964) designed by Arup Associates, comprising a six-storey brutalist block on stilts, with a brick podium below. This block towered over the other low-rise buildings of the garden city however it was demolished in 2004.

- 6.14 The site is located within this industrial area, situated to the east of the town centre and adjacent to the railway line. This complex of industrial buildings creates a strong contrast to De Soissons neo-Georgian town centre to the west.

- 6.15 Earlier phase of buildings on site include Welwyn Studios, a film studio built in 1928 by British Instructional Films which produced *The 39 Steps*, *Brighton Rock* amongst others. The site was then sold to Ardath Tobacco and a factory designed by De Soissons was built around it. The British chemical company ICI based its headquarters in WGC from 1938 and at its peak in the mid 1960's employed around 4000 people at its 65-acre site. This was built in phases from 1954 to 1963, using a variety of architects; J. Douglass Mathews & Partners, E. D. Jefferiss Mathews and Ronald Salmon & Partners; all contributing to the designs.



Figure 10- Welwyn Studios now demolished

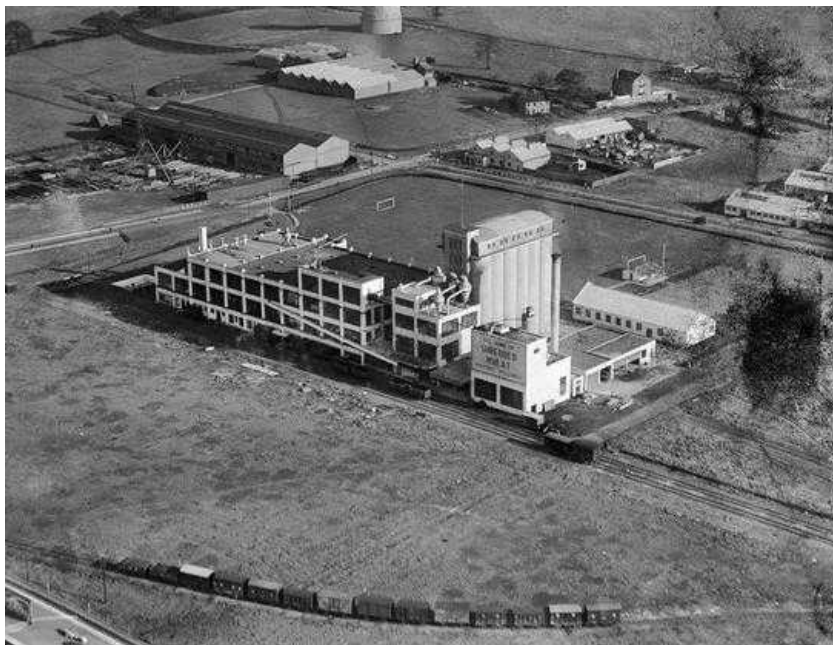


Figure 11- Aerial view of Shredded Wheat Factory, early twentieth century.

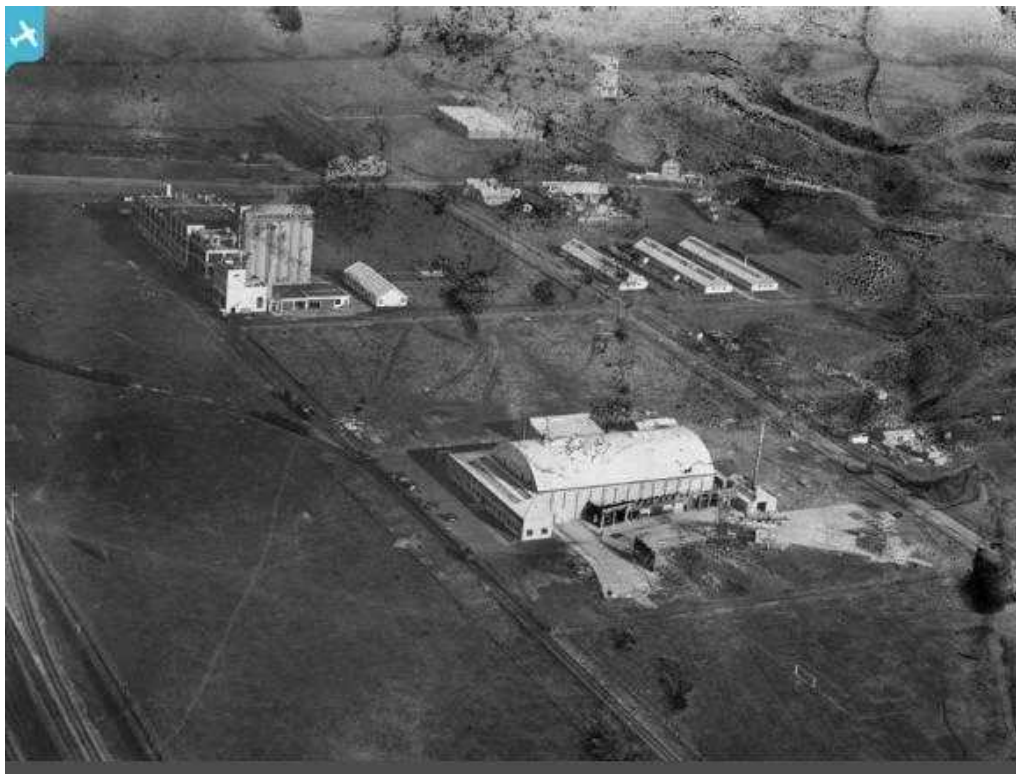


Figure 12- Aerial Image of British Instructional Film Studios(front) and Shredded Wheat Company Works (rear) 1928



Figure 13- Shredded Wheat Factory and other Industrial Works circa 1930

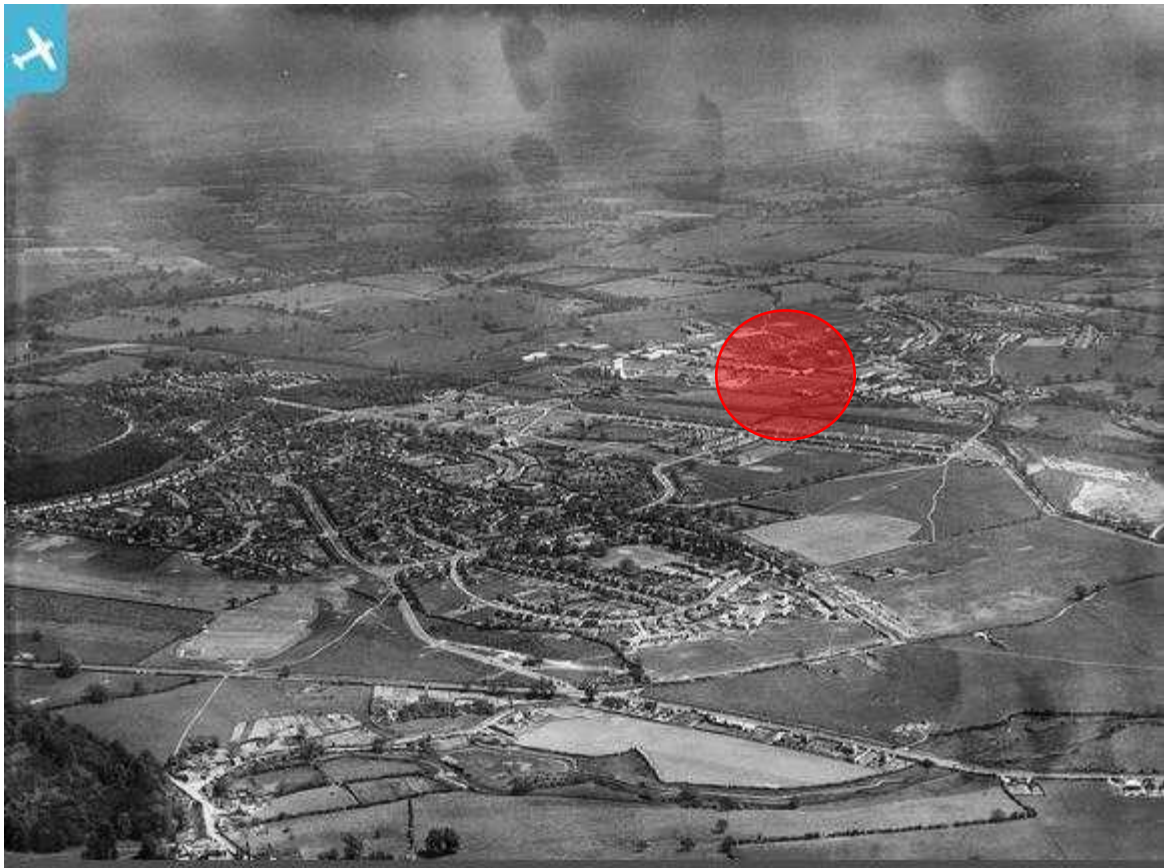


Figure 14- Aerial view of Welwyn Garden City from South West circa 1930s (approximate location of site highlighted in red)

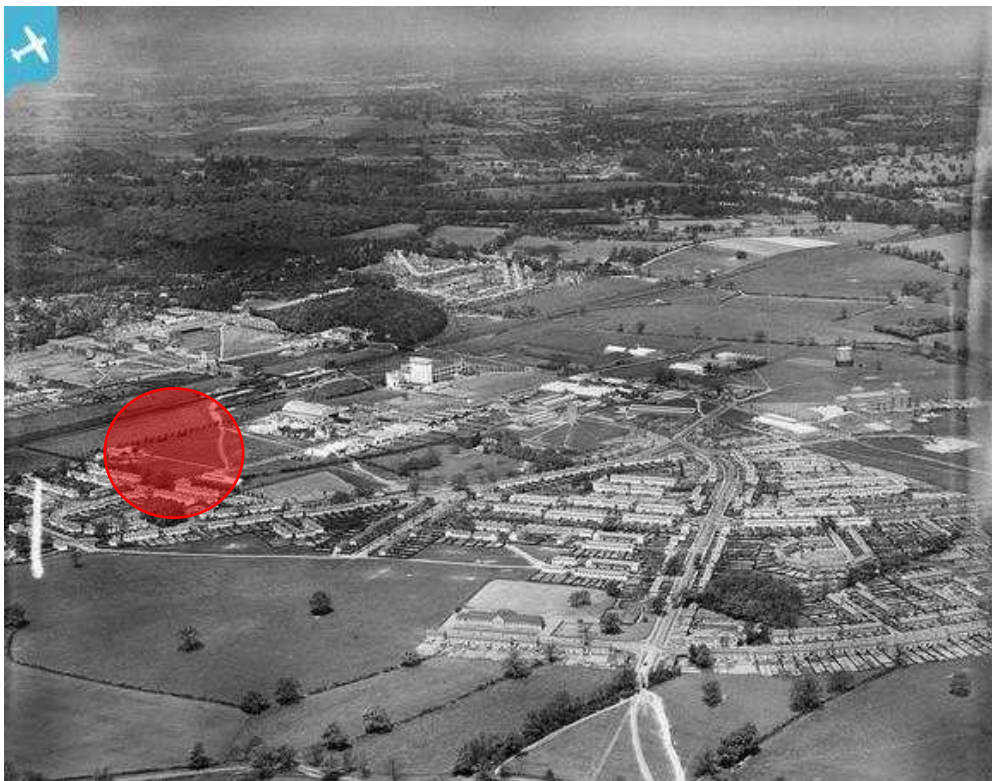


Figure 15- Aerial view of Welwyn Garden City from South East 1935 (approximate location of site highlighted in red)

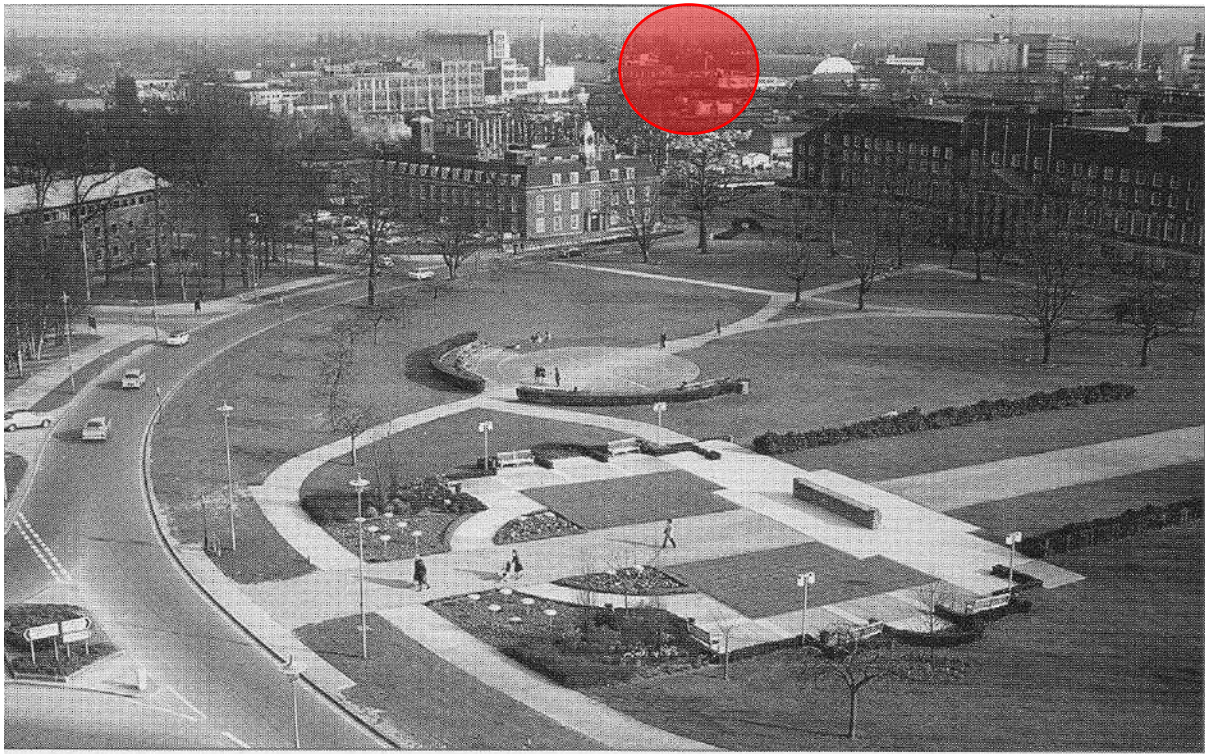


Figure 16- The Campus of Welwyn Stores to right 1972 (approximate site location highlighted in red)

7.0 Planning History

- 7.1 This section outlines the relevant planning history for the site and surroundings, including the allocated site known as the Shredded Wheat Corner to the north and Roche Factory development by Taylor Wimpey to the east.
- 7.2 The allocation of the Broadwater Road site set out the vision for the redevelopment of the area as follows:

“To deliver an energetic and pioneering scheme of development which integrated the spirit of the garden city with the very best of high quality 21st Century design, seizing the opportunity to enhance the local environment and create a sustainable, supported neighbourhood of an appropriate scale, which successfully integrates with the local community.”

- **2010**, Consented Application N6/2010/1776/MA, for 200 units within the former Roche Factory site.
- **2010**, Refused Application N6/2010/2055/MA for the land surrounding the Shredded Wheat building, comprising a mix of uses notably 14,000sq.m of office, 344 residential units and a new retail supermarket.
- **2015**, Consented Application N6/2015/0294/PP for the land surrounding the Shredded Wheat building, outline permission for development with (part retention and part demolition) for 850 residential units and C 14,000 sq.m. of buildings hosting workspace, healthcare, hotel, shops and restaurants and community uses. This application was approved in Nov 2017 subject to planning conditions and with an accompanying legal agreement.
- **2015**, Consented Application (2015/0293) for the land surrounding the Shredded Wheat building, approved the removal buildings on the site retaining a portion of the silos, the boiler house, grain house and production hall.
- **2016**, Consented Application for N6/2016/1882/FUL for the conversion of the listed Roche Building to 34 residential units.
- **2018**, Consented Application for 6/2018/0171/MAJ for the creation of a mixed-use quarter comprising the erection of up to 1,340 residential dwellings including 414 (31%) affordable dwellings (use class c3); 114 extra care homes (use class c2); the erection of a civic building comprising 497 m² of health (use class d1), 497 m² of community use (use class d1), 883 m² of office (use class b1) and 590 m² of retail (class a1/a2/a3/a4/a5); alterations, additions and change of use of grade ii listed building and retained silos to provide 5,279 m² of flexible business floorspace (use class b1), 270 m² combined heat and power (sui generis), 2,057 m² international art centre (use class d1), 1,235 m² gymnasium (use class d2), 1,683 m² of restaurant/coffee shop/bar (use class a1/a3/a4/a5), creche/day nursery (use class d1) of 671 m² as well as a network rail toc building (use class b1) of 360 m²; plus associated car parking, access, landscaping, public art and other supporting infrastructure.
 - This application prompted following comments from the Welwyn Garden City Society regarding design and heritage and townscape impact:
 - Tower blocks too similar around the De Soissons original building. Those between the silos and Howardsgate are too high and this view would be lost.

- Lack of greenery on the site needs to align with WHBC tree strategy and garden city image.
 - Exterior should match the current brick colours used in WGC and a determined effort to link the two sides of the town.
 - Influences of Le Corbusier and Beaux Arts felt to be out of place and inappropriate
- Historic England commented that they were satisfied that the current, revised scheme would not cause additional harm to the significance of the listed buildings as a result of the impact upon their settings.

7.3 The delegated report noted that:

“A related consideration is the impact on heritage and in particular the scheme's alignment with garden city principles. Conservation area and listed building impacts will also be considered under the Council's statutory duties under Sections 16 and 73 of the Listed Building and Conservation Areas Act and having regard to para 196 of the NPPF... Having weighed up the scheme it is concluded that this is a well-designed development that puts place-making at its heart, optimises the site's attributes and makes very effective use of the land. The renovation of all of the remaining listed structures (the Silos, Grain Hall and Production Hall) are considered to provide a balance between preserving and enhancing the character of the area and listed building whilst providing a positive setting in the design of surrounding buildings and spaces. It is considered that the scheme has many significant qualities that help to create a new part of Welwyn Garden City.

Whilst not all views are able to be protected the scheme does offer important glimpses through the site and the preservation of the iconic character of the retained Shredded Wheat Buildings, in a new setting. The development is taller and denser than the previous scheme but the overall design and feel of the scheme does not overwhelm or negatively impact on its surroundings. It is considered the scheme provides an attractive new townscape. It makes the most of the site and will bring new vibrancy to the area...It is for these reasons that it is considered that the proposals will not detract from or harm the character or appearance of the nearby Welwyn Garden City conservation area.”



Figure 1 Extract from Design and Access Statement Collado Collins

Figure 17. 2018 Consented Shredded Wheat Masterplan.

8.0 Site Assessment

- 8.1 The site presently comprises a 37.47 metre-high tower with attached sheds and ancillary structures located to the east of Welwyn Garden City railway station. The buildings are indifferent in terms of architectural quality and the massing of the whole appears incidental and purely functional. This is expressed in the mix of materials and placement of the fenestration, with no discernible aesthetic style save for a blue treatment to window cills. The buildings form a relatively late phase of development within the industrial zone, and lack the modernist and 'moderne' aesthetic which characterised some of the more influential buildings within the industrial zone, many of which have now been demolished.
- 8.2 The building footprint within the site is large scale, building in height towards the railway and terminating in the tall eight storey tower. Additional height is created in the surroundings through the chimneys which abut the tower building to the north. The chimneys and plant work to the roof highlight the overwhelmingly utilitarian and incidental appearance of the site. Glimpses of these elements are the main way the site is experienced from the majority of the surroundings. Consequently the utilitarian character of the site is the most far reaching.
- 8.3 The building's overall architectural and historic value is therefore considered to be **nil**. Given their relative height and proximity to the railway, they do however possess a high visibility within the surroundings, including from within the conservation area to the west and the crossings over the railway to the north and south.
- 8.4 The surroundings of the site, once a major industrial hub, is now largely cleared for redevelopment following consented applications N6/2015/0294/PP and 6/2018/0171/MAJ. To the east Broadwater Road creates the main access to the site and also creates a clear distinction in the surrounding townscape, dividing the old industrial zone from the residential housing to the east and modern industrial areas to the north east. Broadwater Crescent to the south is also residential in nature creating a late twentieth century suburban townscape. To the west the East Coast Mainline creates a significant boundary, dividing the site from the town centre. A footbridge over the railway line creates a link into the industrial zone however access is not immediately clear.
- 8.5 The redevelopment of the area to the north with residential blocks has commenced with a terrace of housing to adjacent to the site to the east. The overwhelming character of the area however is one of dramatic contrast to the more suburban scale of the surroundings. The industrial history and historic boundaries of this zone is clearly legible, appreciable both in terms of the sharp step change scale, grain, materials, height and density which contrast to the consistency of the red brick suburban dwellings within the surroundings. Middle range views to the north take in the Shredded Wheat factory which along with the tower within the site, bookends the industrial zone along Broadwater Road. It is noted that consented development will filter the existing views between the site and Shredded Wheat factory.
- 8.6 Due to the parallel nature of the railway and Broadwater Road, and the position of the access road, the site currently possesses a somewhat inaccessible and hostile character, establishing an awkward relationship with the surrounding residential areas and the town centre in particular. This indifferent character is underscored by the long range views towards the site with the elevations and roofline unresponsive in terms of acknowledging the significant visibility of the site from the surrounding area.



Figure 18. View south from the top of the Biopark Building taking in the residential suburbs.

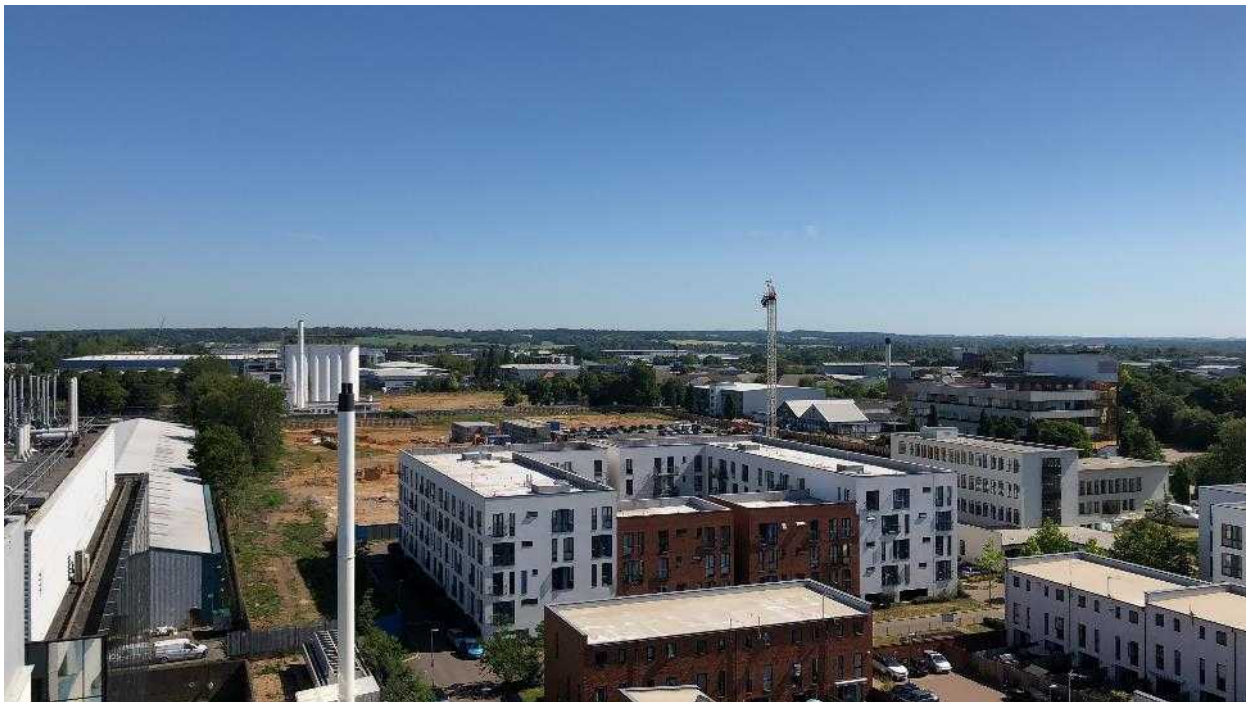


Figure 19. View north from the Biopark Building, note the Shredded Wheat Silos can be seen in the middle distance, as can the cleared site of what used to be the industrial zone.



Figure 20. Main façade of the Biopark Building. Note generic utilitarian appearance.



Figure 21. Area of hardstanding to the south of the main building.



Figure 22. Access road from Broadwater Lane.



Figure 23. Prefabricated buildings within the site surroundings.



Figure 24. Side elevation showing substantial massing within the site.



Figure 25. Railings surrounding the site creating an inaccessible back land character.



Figure 26. Side elevation of indifferent design.



Figure 27. Brick stair tower is separately articulated.



Figure 28. View towards recently consented development to the north.



Figure 29. Note tall projecting elements and plant work increasing the sense of height across the site.



Figure 30. The site is presently derelict, with signs of poor repair throughout.



Figure 31. View north looking along the railway line to the sheds to the north.



Figure 32. View towards Welwyn City Centre, looking north west across the railway line.



Figure 33. View towards the Welwyn Conservation Area, note the interior character of the conservation area is not appreciable.



Figure 34. Side elevation of the Biopark building, note the utilitarian design.



Figure 35. Side elevation, the building is of indifferent design.



Figure 36. View east from Biopark, note new residential development within the industrial zone.



Figure 37. View north east from Biopark, note listed Former Roche Office Building in the middle distance. intervening modern residential development can be seen.



Figure 38. View north towards the Shredded Wheat factory.



Figure 39. View north west looking towards Welwyn Garden City.



Figure 40. View south from Biopark Building towards late twentieth century suburb.



Figure 41. View south from the Biopark Building towards Hatfield House (not distinguishable).

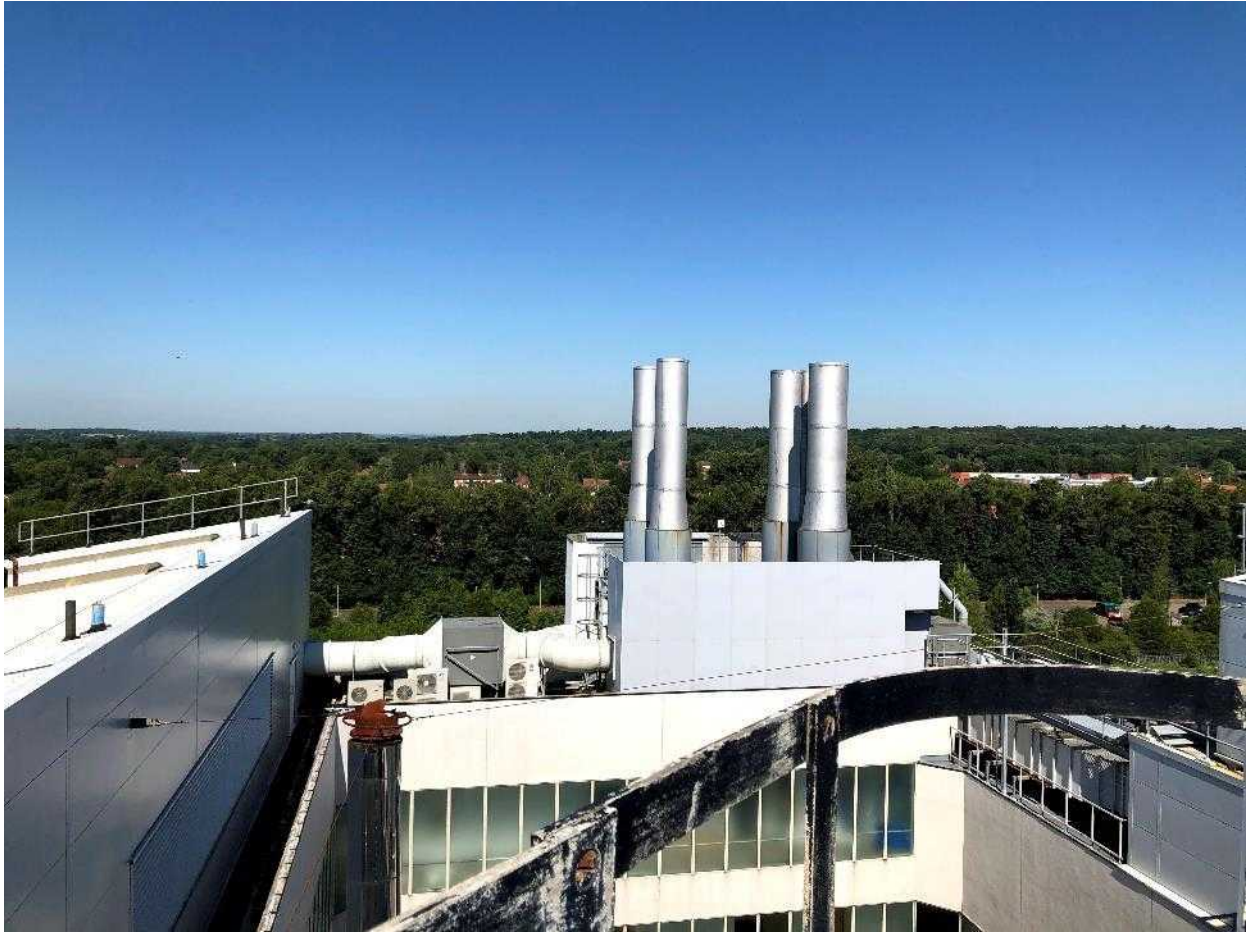


Figure 42. View west looking towards the Welwyn Garden City Conservation Area centre.



Figure 43. Underground carpark underneath the site.



Figure 44. View of the main buildings within the site from within the area of hardstanding to the south.



Figure 45. View of the site from Broadwater Road.

9.0 Heritage Assets

- 9.1 This section identifies heritage assets which have a relationship with the development site. In the case of this application, the following designated heritage assets are local to the proposed development and have been identified as they may be affected by the current proposals. The identification of these assets is consistent with 'Step 1' of the GPA3 The Setting of Heritage Assets. This section has consulted the historic environment record which has informed the identification of heritage assets with the potential to be affected. While there are other heritage assets in the wider vicinity due to a lack of view, distance from site and intervening development these have been scoped out for assessment.
- 9.2 Although there are numerous assets within the local surrounding area, the location and significance of many of them results in them having no perceptible relationship with the proposed development. For this reason, only the heritage assets which may be considered to be affected by the proposed development have been highlighted. All relevant Statutory List descriptions can be found in Appendix 1.
- 9.3 In the case of this application, the following designated heritage assets may be affected by the current proposals:
1. **The Nabisco Shredded Wheat Factory, Grade II**
 2. **Former Office Block (Buildings 1 to 4) to Roche Products Factory, Grade II**
 3. **Hatfield House, Grade I**
 4. **The Welwyn Garden City Conservation Area**
 5. **Hatfield House Registered Park and Garden, Grade I**
- 9.4 This section will determine the significance of heritage assets determined to be affected by the proposals. This assessment will be proportionate to determine the impact of the emerging proposals in line with paragraph 189 of the NPPF.

Nabisco Shredded Wheat Factory, Grade II



Figure 46. Location of the Shredded Wheat Factory noted in green, the location of the site is noted in red.

Historic Interest

- 9.5 The Shredded Wheat factory retains **high** historic value as the primary industrial building which commenced development of the industrial zone, creating a landmark within the surroundings that retains a representative quality, as well as expressing the 'zoned' ethos of the Garden City movement. The building is also illustrative of the rise of industrialised food production and contemporary ideals regarding health standards. This interest resides primarily in the remaining historic fabric which dates between 1924 and 1926.

Evidential Interest

- 9.6 Pioneering construction methods were used during the buildings development, illustrating technological advancement. It is noted however that materials used were widely available. It is noted that consented for the alteration of the building has been granted, and as such this interest will be diluted with the partial loss of the remaining intact historic structure. The overall evidential value is **low**.

Architectural Interest

- 9.7 Designed by Louis de Soissons, the building forms one part of De Soissons vision for the town and as such is of **high** architectural value. The building illustrates De Soissons ease in switching between the modern and Neo-Georgian styles seen within the city centre. Finishes and decoration is simple, in keeping with the overarching style. It is noted that the building has been stripped of its original machinery.
- 9.8 As noted the silos have a landmark, monumental quality and the wider complex uses an innovative flat-slab construction method, creating a light and airy factory that was considered a 'model' for intensive food factory production. The building was influential within the wider culture, with the building itself featured on cereal packets as well as within the livery of delivery vehicles.

Communal Interest

- 9.9 There is **medium** communal value within the Shredded Wheat Factory complex. Part of this value is residual, reflected in the commemorate interest as an important place of employment for many of the residents of Welwyn Garden City. The landmark quality of the building, is also important with regards to wayfinding and the identity of the city.

Summary of Significance, setting and contribution of the site

- 9.10 This factory was one of the first to located to the town, opening in May 1924, attracted by the Garden City image. When first built the structure included excellent amenities and working conditions, including a recreation ground. Whilst the design of the site and buildings were informed by the functional demands of modern manufacture there is a strong influence of the increased awareness of branding the company's name and a strong corporate image. The setting of this building is completely removed following the waves of twentieth century alteration and recent clearance of the industrial buildings to the south. The building however retains a landmark quality, dominating the skyline. The buildings within the site, while of an architecturally different style, reinforces a sense of height in the surroundings. The architectural quality of the

buildings within the site is considered to be indifferent, creating an overall **neutral** contribution. The overall significance of the building is considered to be **medium**, with a **low sensitivity**.



Figure 47. View of the Shredded Wheat Factory from the South.



Figure 48. Aerial view of the Shredded Wheat Factory, Grade II.



Figure 49. Historic view of the Shredded Wheat Factory seen from the entrance gate.

Former Roche Office Building, Grade II



Figure 50. Former Roche Office Building location indicated in green, the location of the site indicated in red.

Architectural Interest

- 9.11 The architectural value of the listed building resides in its interest as an twentieth century example of a purpose built multifunctional industrial building, combining a factory, offices, warehouse and research facility dating to the 1930s. This interest has however been diminished by the demolition of the original factory block as well as the consented conversion of the building to residential use. As designed the building sought to use a responsive plan with modular design

and partitioning enabling a degree of flexibility in order to respond the evolving needs of the industry. When finished the building was featured in the Architects Journal indicating a degree of innovation to the design. The building is considered to be a good example of the International Modernist style, through the use of simple geometric forms, intersecting massing and crisp horizontal emphasis. The overall architectural interest is considered to be **moderate** following the consented conversion of the building to residential use.

Historic Interest

- 9.12 The Architects' Journal (article dated 19 January 1939) demonstrated that the building was intended as a first phase of a larger plan to develop this large site on the west side of Broadwater Road. The building has been attributed to both Stanley Brown as well as the Swiss architect Otto R Salvisberg. Better known for large scale social housing, Salvisberg is an influential architect across the continent, founding his own practice in 1914. The historic interest of the building is therefore **high**.

Evidential Interest

- 9.13 The building is expressive of contemporary building techniques and materials. This includes the porte-cochere supported on pilotis to the east elevation, travertine lining to the recessed main entrance, bronze doors, the use of curved concrete and oversailing roofline. The overall evidential interest is considered to be diminished following the consented application to convert the building to residential use. The overall evidential interest is considered to be **moderate**

Communal Value

- 9.14 There is residual communal interest in the commemorative value of the building as a place of employment. The overall communal interest is considered to be **low**.

Summary of significance, setting and contribution of the site

- 9.15 The listed building has undergone significant alteration however it retains a strong sense of its original architectural modernist character, expressed in the strong geometric perpendicular appearance. The complex as a whole was designed to be appreciated from Broadwater Road to the east however the immediate setting of the building has changed substantially. While there was a history of expansion leading to the completion a terrace of larger blocks immediately to the west and south of the main structure, these have been cleared from the surroundings towards the end of the 20th century and now redeveloped by a recent residential development with associated car parking and landscape. The direct relationship with and responsive character to Broadwater Road to the east has however been retained. The overall significance of the listed building is considered to be **medium** with a **low** sensitivity for change.
- 9.16 While both the buildings within the site and the listed building share a commercial character, there is little architectural relationship between the two. The tower within the site presently dominates that of the listed building in terms of height, however the set back away from the road to the west means that the site creates a backdrop rather than obscuring the listed building. The contribution of the site to the listed building is currently therefore considered to be **negative** in terms of the indifferent architectural character of the site and dominating appearance, which fails to respond to the considered modernist aesthetic of the listed building.



Figure 51, Former Roche Office Building, seen from Broadwater Road. Note glimpses of the buildings within the site seen to the rear.



Figure 52. Former Roche Office building prior to the redevelopment of the surroundings and the conversion of the listed building.

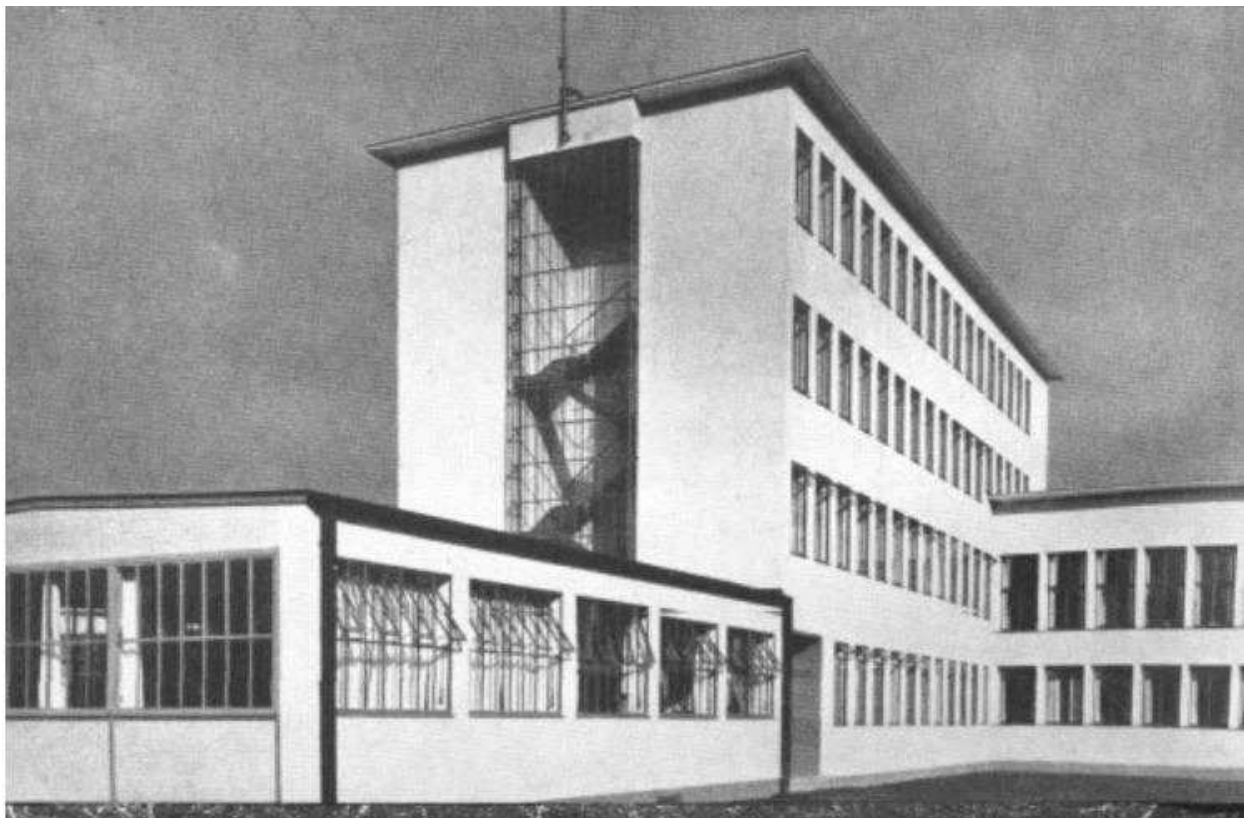


Figure 53. 1930s artistic impression of the Roche Office and Factory, Grade II.

9.17 Hatfield House, Grade I

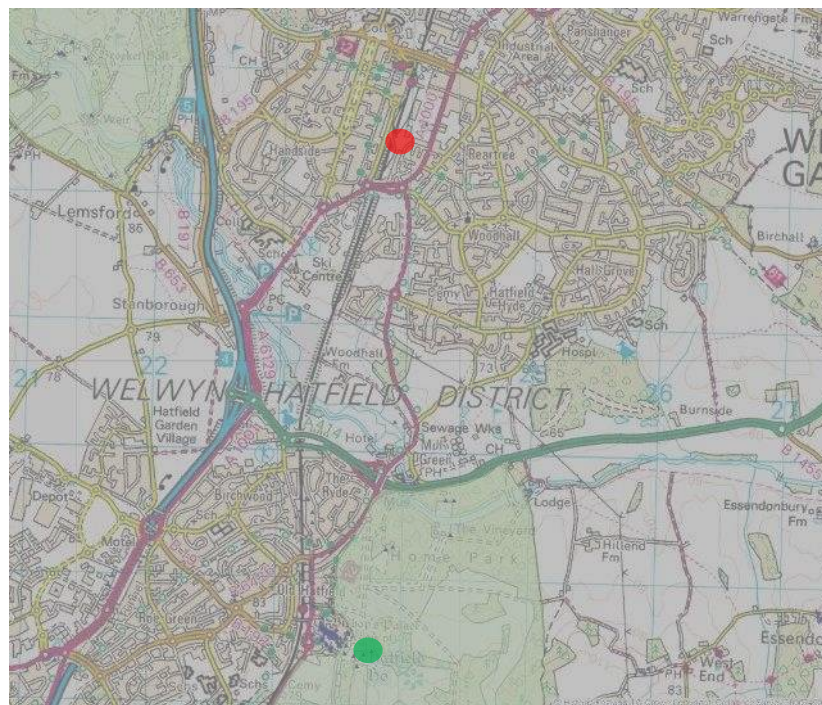


Figure 54. Map showing location of Hatfield House, indicated by the green dot. The location of the site is indicated by the red dot.

Historic Interest

- 9.18 Hatfield House is an early seventeenth century mansion located at the west edge of the surrounding park land within a level plateau and near the old mediaeval palace (separately listed Grade I). The house was initially constructed for Robert Cecil, first Earl of Salisbury, between 1607 and 1612, with later waves of alteration. As a rare surviving mansion of this date the historic interest of the building is **very high**.

Architectural Interest

- 9.19 The building was designed by Robert Liming and thought to have been assisted by Inigo Jones. While the west wing was partially destroyed by fire in 1835, the building has retained a seventeenth century character with red brick and stone dressings, built to an E shape ground plan. The main entrance to the house has altered over time, from the south to the north. The building has retained an arched octagonal turret with leaded cupola, attributed to Inigo Jones. The overall architectural interest is **very high**, noted for the richness of the interior decoration.

Evidential Interest

- 9.20 The evidential interest of the building is **very high**, reflecting a rare example of a number of historic building techniques and materials.

Communal Interest

- 9.21 The house as a landmark quality and is presently publicly accessible. There is therefore a **high** communal interest.

Summary of Significance, setting and contribution of the site

- 9.22 The overall significance of the building is **very high** with a **high sensitivity**. The setting of the building reflects the extensive park land surrounding the house, including formal gardens, woodland and lengthy avenues to the north and south. At site visit no accessible views were identified of the site from the house or surroundings, although it is understood from previous applications that glimpses of the Biopark building are just perceptible from the upper floors of the house. These views take in both the silos of the Shredded Wheat Factory and surrounding townscape of Welwyn Garden City. The current contribution of the site to the significance of the listed building is therefore thought to be **negligible**.



Figure 55. Aerial view of Hatfield House, Grade I.



Figure 56. Old south front of Hatfield House, Grade I



Figure 57. View from the northern façade of Hatfield House looking north towards the site.



Figure 58. Historic view of Hatfield House looking north towards the site, 1948.

Hatfield Park And Garden, Grade I

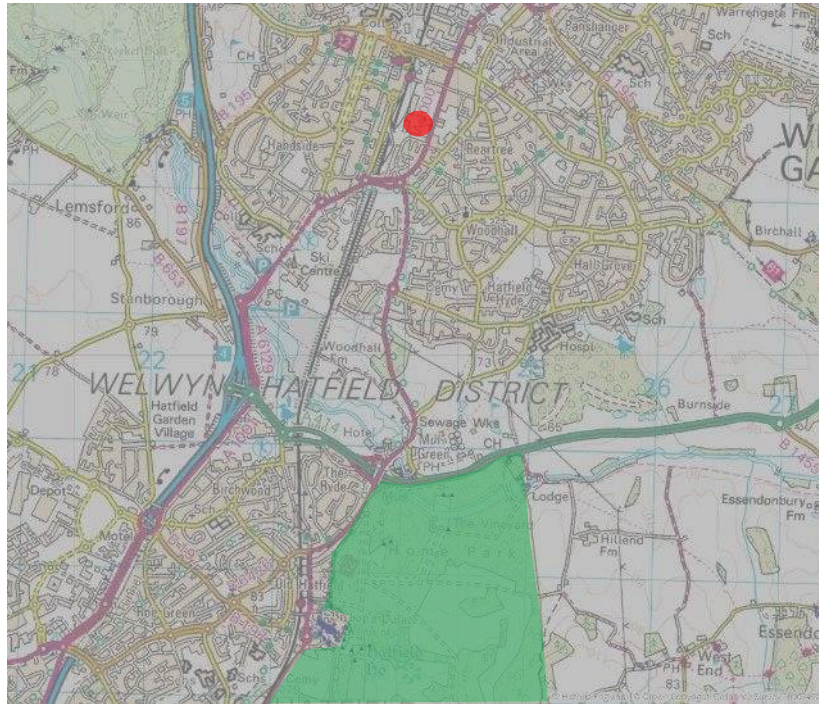


Figure 59. Map showing location of Hatfield House Park and Garden, indicated by the green transparency. The location of the site is indicated by the red dot.

- 9.23 The park and garden reflects the extensive park land and more formal gardens surrounding Hatfield House and Palace comprising circa 7.5 sq km of land. This encompasses the original medieval hunting parks of Hatfield as well as waves landscape design. Remaining within the park today are the basis of the formal gardens designed by Robert Cecil dating to the early seventeenth century, and include designs by Thomas Chaundler and Salomon de Caus. Later waves of development however include new landscaping in the eighteenth century before a further wave of remodelling in the nineteenth and twentieth century.

Summary of Significance, Setting and contribution of the site

- 9.24 The overall significance of the park and garden is **high with a high sensitivity**, given the rarity and appreciably layered historic character of the site which remains readily identifiable to the visitor.
- 9.25 The land rises and falls across the site creating unfolding views within the parkland. There is a plateau in the vicinity of the western and southern boundaries, creating more extensive views north from the main house as well as the from the south of the parkland. These longer-range views are reflected in the alignment of the southern approach to the main house as well as the formal avenue through the park land to the north. The wider setting of the park is rural to the east, with the new town of Hatfield adjacent to the west, and several villages to the south.
- 9.26 To the north, while the northern boundary to the park land is comprised of Herford Road, there is a further 500m of open land between the boundary of the park and the commencement of suburban Welwyn Garden City. The north drive was, before the west entrance was built in the late C19, one of the principal approaches to the house. This avenue enters the park from the Great North Road, approximately 1.2km north of the House, via a gatehouse and extends south surrounded by woodland, before this opens out into the park c 500m north of the House. The immediate approach to the house is the gravelled forecourt between terracotta ornamental posts.

The city is just about perceptible in longer range views from the south looking along the northern drive, and this includes slight and extremely distant views of the Shredded Wheat Factory and existing Bio Park building within the site. These views take in the wider residential development to the north and as such the contribution of the site to these views is considered to be **negligible**.



Figure 60. View from northern avenue looking towards Hatfield House.



Figure 61. View towards the site from the woodland to the north of the house within the park.

Welwyn Garden City Conservation Area



Figure 62. Welwyn Conservation Area Boundary, indicated in green, with adopted extensions highlighted in orange. The site is highlighted with the red transparency.

- 9.27 The Welwyn Garden City Conservation Area was first designated in 1968, with subsequent minor additions to the south and west. The conservation area boundary covers the main part of the Garden City west of the Mainline railway line, encompassing the commercial and civic heart of the city reflected in the location of the Parkway. As noted within the historic development section, Welwyn Garden City was only the second new town to be developed in accordance with the Garden City principles laid down by Ebenezer Howard. The design vision for the town was created by Louis de Soissons, who not only was the architect of the overall masterplan, but also was designed a significant number of buildings. In summary his masterplan reflected a civic and commercial centre for the town on the west side of the East Coast Mainline balanced by a factory area on the east side of the railway, and the whole enclosed by a ring of residential development.

- 9.28 The street layout remains broadly recognisable as that designed by De Soissons with the strong geometry of the city centre contrasting with the more organic grain developed in the surrounding residential areas. As such grain and street pattern has an influential quality, enhanced still further in the otherwise consistent neo-georgian aesthetic which gives an appreciable early to mid twentieth century architectural identity to the whole.

Summary of Significance, setting and contribution of the site

- 9.29 As such formal views and set pieces are clearly identifiable, as is the appreciable sense of change and transition when you leave the conservation area limits. Interest and variety at street level is provided in the playful use of decoration, creating specific identify to individual streets and undercutting what might otherwise be a somewhat monotonous townscape. The overall significance of the conservation area is considered to be **moderate** with a **low sensitivity** reflecting the redevelopment of key areas such as the town centre.
- 9.30 It is noted that the industrial zone has never formed part of the conservation area, reflecting both the changing nature of the utilitarian landscape within this zone, necessitated by the regular redevelopment of historic buildings and fabric. The site presently is perceptible from within conservation area, with glimpsed and partial views east from the low-lying suburban surroundings. Please see townscape character area analysis for further assessment of the contribution of the site to specific sub-areas within the conservation area.
- 9.31 The overall contribution of the site to the conservation area is considered to be **negative**.
- 9.32 Below is a summary of the overall significance of each identified heritage asset. The significance of the asset is a combination of its evidential, aesthetic, historic and communal values.

ASSET	DESIGNATION	OVERALL SIGNIFICANCE	SENSITIVITY	CONTRIBUTION OF SITE
Shredded Wheat Factory	Grade II	Medium	Low	Negative
Former Roche Office Building	Grade II	Medium	Low	Negative
Hatfield House	Grade I	Very High	High	Negligible
Welwyn Garden City Conservation Area	n/a	Medium	Low	Negative
Hatfield House Park and Garden	Grade I	High	High	Negligible

10.0 Townscape Character Areas

- 10.1 This section will determine the townscape character areas surrounding the site, indicating their overall townscape value and potential to be affected by the proposals. This section has been informed by an initial desk based study followed by a site assessment. A desk based assessment has suggested that the radius of townscape sensitivity is 500m from the site, indicated by the red dashed line in Figure 63 below. This section also includes the identification of views potentially impacted by the proposals, indicated by the red arrows. These views have been agreed with Place Services. While it is acknowledged that there may be additional views of the site from the surroundings not highlighted below, it is determined that the impact to these views will be sufficiently represented in the assessment of those highlighted in figure 63.

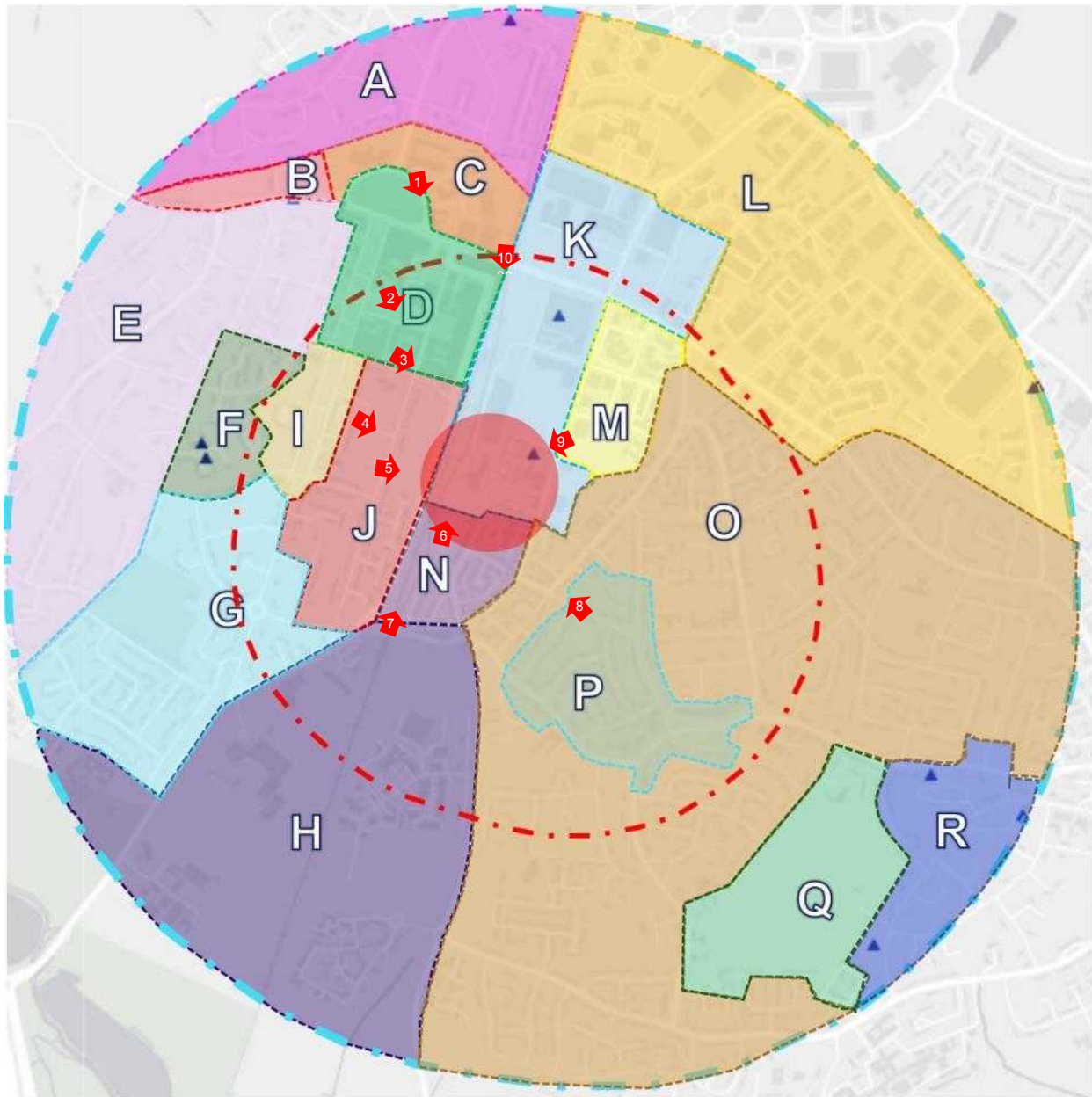


Figure 63. Townscape Character Areas. Blue dotted line, 1km radius. Red dotted line, 500m radius. Blue triangles indicate the location of listed buildings. Red arrows indicated viewpoints for assessment agreed with the council.

A Sherrards Park

- 10.2 Townscape character area A is located to the north west of the site, it possesses **moderate** townscape value and falls within the Welwyn Garden City Conservation Area, beyond the radius of townscape sensitivity. The area is residential, and the overwhelming character is of a leafy residential suburb. A sense of spaciousness is created further by the rise in the land to the north west creating longer range view over the town centre than within the majority of the conservation area. Developed in the 1930s, the architectural character is consistent, comprising domestic red brick two storey dwellings. This character area falls outside the threshold of townscape sensitivity, due to distance and intervening development. The contribution of the site is therefore **nil**. This townscape area has therefore been scoped out of assessment.



Figure 64. Left 1920s historic masterplan, right aerial view of townscape area. Approximate location of the area indicated in yellow and the site indicated in red.

B Shire Park Business Area

- 10.3 Townscape character area B is located within the Welwyn Garden City Conservation Area beyond the area of townscape sensitivity to the north west of the site. This area is primarily under office use and reflects a larger scale massing associated with a twentieth century business park of **minor** townscape value. Due to distance and intervening development it has therefore been scoped out of assessment and the contribution of the site is **nil**.



Figure 65. Left 1920s historic masterplan, right aerial view of townscape area. Approximate location of the area indicated in yellow and the site indicated in red.

C The Campus

- 10.4 Townscape character area C is located, over 500 meters to the north west of the site, however it falls within the conservation area boundary and is of **moderate** townscape value. The character of the area is institutional and signals the entry into the Town Centre. The elevated position creates longer views of the town centre to the south looking across the semi-circular open space which indicates the beginning of the parkway. However the majority of the buildings within this character area face inward, creating an enclosed character across the majority of its extent. This character area falls outside the threshold of townscape sensitivity, due to distance and intervening development and no views of the site have been identified. This townscape area has therefore been scoped out of assessment and the contribution of the site is **nil**.

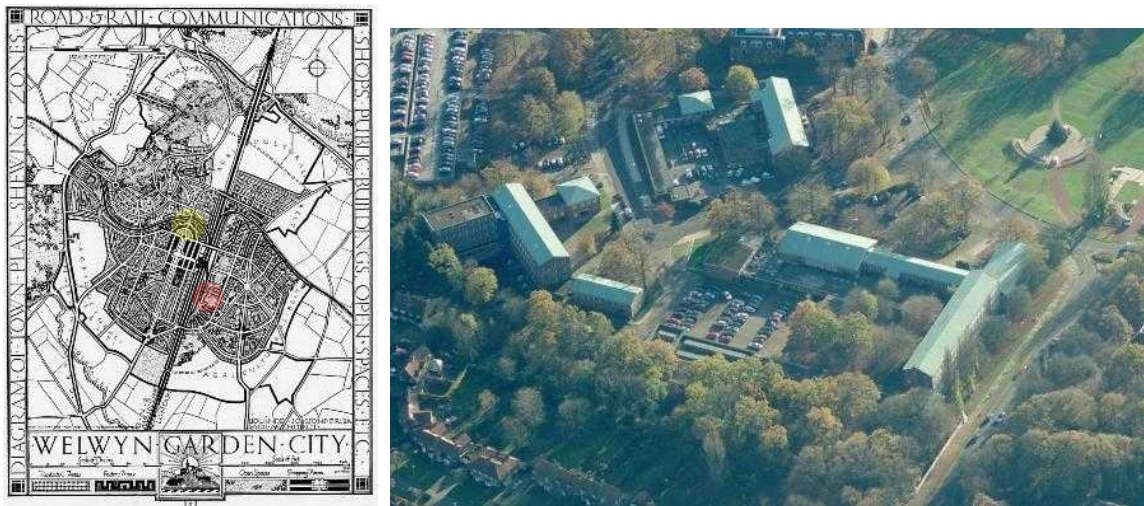


Figure 66. Left 1920s historic masterplan, right aerial view of townscape area. Approximate location of the area indicated in yellow and the site indicated in red.

D Parkway Commercial Town Centre

- 10.5 Townscape Character Area D is located within 500m of the site to the north west, falling within the conservation area and is of moderate townscape value. This area falls within the town centre policy area. This area reflects the commercial centre of Welwyn, expressed in the formal geometry of the streetscape which includes the lengthy avenue of the parkway. This avenue is commenced by a semi-circular green space with formal views to the south taking in the length of the city centre and residential suburb beyond. The architectural character is mixed with several late twentieth century structures, including the Howards Centre which contains the station and shopping centre. This is reflective of the significant degree of change within the area which has included the conversion of many of the original structures dating to the first development. Sporadic redevelopment has resulted in a mixed overall architectural quality, whilst a material pallet has remained nevertheless identifiable. The town centre character is however appreciable through the formality of the street layout despite this evolution. Due to the substantial scale of the Howards Centre to the eastern boundary, views of the site are limited to glimpses from the eastern edge of the character area and from the northern end of the parkway. These views also take in the railway, creating an experiential barrier which underscores the limits to the town centre. The overall intervisibility between this area and the site is therefore limited. Therefore the site presently makes a **neutral** contribution, clearly distinct from the internal character of the parkway area, and only partially visible from the outer boundaries of the area.

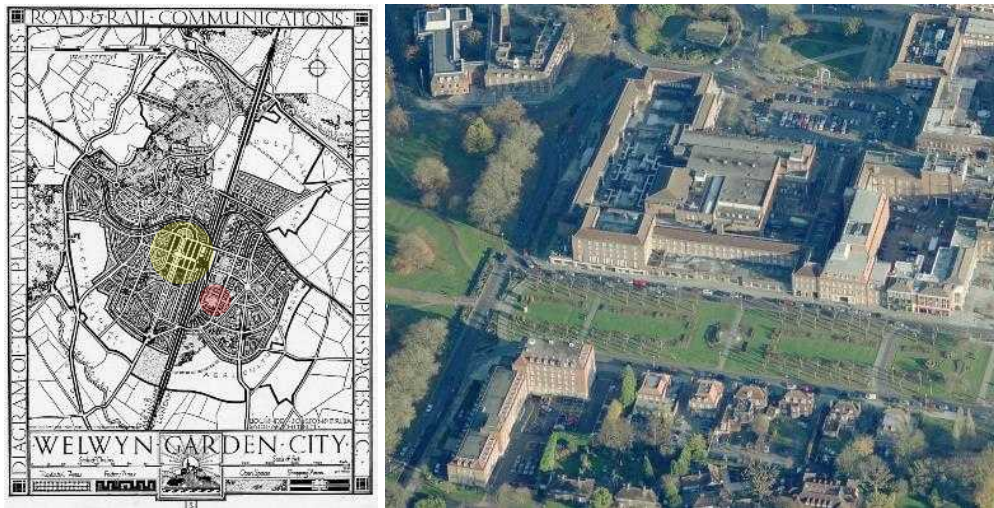


Figure 67. Left 1920s historic masterplan, right aerial view of townscape area. Approximate location of the area indicated in yellow and the site indicated in red.

E Handside Lane

- 10.6 Townscape character area E is located over 500 meters to the north west of the park, falling outside the area of townscape sensitivity. The area reflects an early part of the original development of the city, retaining many of the houses constructed as part of the first wave of development in the 1920s resulting in an overall **moderate** townscape quality. This character area falls outside the threshold of townscape sensitivity, due to distance and intervening development with no views of the site identified. This townscape area has therefore been scoped out of assessment and the contribution of the site is **nil**.



Figure 68. Left 1920s historic masterplan, right aerial view of townscape area. Approximate location of the area indicated in yellow and the site indicated in red.

F Barleycroft Road

- 10.7 Townscape character area F is located to the west of the town centre, and the eastern most extent of the character area just falls within the threshold of townscape sensitivity as well as located within the conservation area. It comprises a mixed residential area containing both pre and post war development, but largely lacking the detailed architectural quality and spaciousness seen elsewhere within the city. This results in a **minor** overall townscape value. Due to the significant massing within town-centre and the distance of the of the character area from the site, this area has been scoped out of assessment with no views of the site from within the area identified. The contribution of the site is considered to be **nil**.



Figure 69. Left 1920s historic masterplan, right aerial view of townscape area. Approximate location of the area indicated in yellow and the site indicated in red.

G Turmore Dale

- 10.8 This townscape character area is located to the south west of the site, falling within the area of townscape sensitivity and conservation area comprising **moderate** townscape value. The architectural character is mixed, with post war bungalows contrasting with the earlier development along Hangslide Lane as well as the more common two storey red brick

development which characterises the majority of the residential houses along the southern extent of the Parkway. The streetscape is more enclosed than that of the parkway with a series of cul-de-sacs leading away from the primary routes through the area. A large roundabout is indicative of the date of the streetscape and cements a suburban feel. Architectural style varies from street to street however nearly all the buildings form part of small groups, with a repeated style creating small clusters of development which share decorative detail or a material palette. The area is identifiable through the relatively large open ground of the Welwyn Rugby Club. The site is not appreciable from this area resulting in an overall **nil** contribution. Due to distance and intervening development this area has therefore been scoped out of assessment.



Figure 70. Left 1920s historic masterplan, right aerial view of townscape area. Approximate location of the area indicated in yellow and the site indicated in red.

H Chequer Park Land

- 10.9 This area is located to the south of the site, falling within the area of townscape sensitivity but outside that of the conservation area, reflecting a **poor** townscape value. In contrast to the conservation area to the north this area is largely open, with small clusters of commercial and recreational development creating pockets of density within open surroundings. The Twentieth Mile Bridge to the north creates a strong boundary to the north. The area is split by the Railway. Gosling Sports Park to the west of the railway establishes large structures of a much larger scale than the finer residential suburbs to the north. The area includes a running track, tennis courts and ski centre. To the east the warehouses and outlets surrounding Burrowfield, establishes a large area of hardstanding. The dual lane bridge to the northern end of the area carries the A6129 and includes high brick walls. However by virtue of its elevated location as well as the clear view north along the railway the area has clear views from the bridge towards the site. These views fall away to the south. The current contribution of the site is one of contrast with the height of the existing buildings, creating a landmark feature within the horizon line. The indifferent quality of the buildings within the site make this contribution **negative**. As assessed within the site assessment section the existing buildings are considered to have no architectural merit and the existing buildings have no meaningful relationship with the buildings within the character to the south.



Figure 71. Left 1920s historic masterplan, right aerial view of townscape area. Approximate location of the area indicated in yellow and the site indicated in red.

I Parkway Residential Area

- 10.10 This area is located to the west of the site, falling within the conservation area and area of townscape sensitivity. It is a **moderate** value townscape reflecting the character of Welwyn Garden City when first built and comprises the southern half of the primary axis within the city centre known as the Parkway. The architectural character is consistent, showcasing a Neo-Georgian aesthetic preferred by Louis de Soissons in 1924. The buildings clearly relate to the open space of the parkway, with both small terrace rows and detached houses aligning towards the open space along the north south axis of the street. Small subsidiary streets also connect to the parkway, and creating a consistent and even grain. The buildings within the site have no relationship in terms of design, use or materiality with the existing structures significantly postdating the majority of the buildings within the character area. No views have been identified as part of the desk based assessment, and it is noted that the location of the site is away from the main axial view south along the parkway. The current contribution of the site to the character area is therefore considered to be **nil**.



Figure 72. Left 1920s historic masterplan, right aerial view of townscape area. Approximate location of the area indicated in yellow and the site indicated in red.

J Longcroft Lane

- 10.11 This character area is to the west of the site within the Welwyn Garden City conservation area, and is considered to be of moderate townscape value, falling within the area of townscape sensitivity. Similarly to the Parkway Residential area, the lengthy Longcroft Gardens runs parallel to the primary axis through the conservation area creating an unfolding north-south view which appears consistently residential and suburban in character. The street grain is formal, with short red brick terraces consistent with the Neo-Georgian aesthetic favoured by Louis De Soissons. The principles of the garden city movement are clearly discernible, with a spacious plot to each terrace row allowing a set back and front garden away from the road. The provision of garages is also an indication of the date of development with growing attraction of the car lifestyle increasing seen as an integral part of life. The site is presently glimpsed from within the character area, where lower elements of the terraces such as garages facilitate a drop-in roof line. These glimpses are however perceived beyond the existing railway line and further filtered by vegetation. Due to the indifferent architectural character of the site the current contribution of the site is therefore **negative**.

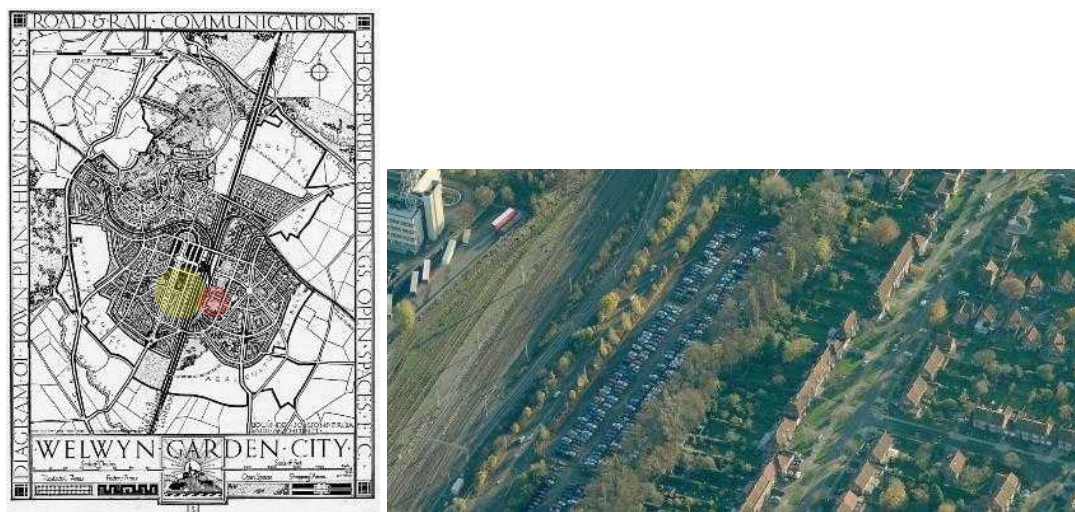


Figure 73. Left 1920s historic masterplan, right aerial view of townscape area. Approximate location of the area indicated in yellow and the site indicated in red.

K Industrial Zone

- 10.12 This character area includes the site, it does not fall within a conservation area and is considered to be of **minor** townscape value. This area comprises the old industrial zone and recent residential redevelopment. The present character is currently fragmentary with large scale works and the clearance of the site prior to redevelopment currently underway. Large scale buildings however remain including the listed Shredded Wheat and Roche Office buildings. The Shredded Wheat building dominates the skyline to the north and is expressive of the historic use of the area, contrasting starkly in terms of scale, massing, character and use from that of the city centre to the west. To the south the redevelopment of the area to provide modern residential homes creates a contemporary architectural character which is clearly distinct from that of the older residential suburbs which are representative of De Soissons original master plan. The site is clearly visible both within the character area and when looking south from the northern boundary. While the consented development will filter these views, the Biopark building retains a landmark quality, establishing a book end to that of the Shredded Wheat building, indicating the southern limit of the old industrial area. However the architectural style of the buildings within the site are clearly late twentieth century in date and lack the interest and character seen within the Shredded Wheat buildings. The overall contribution the site to the character area is therefore **negative**.

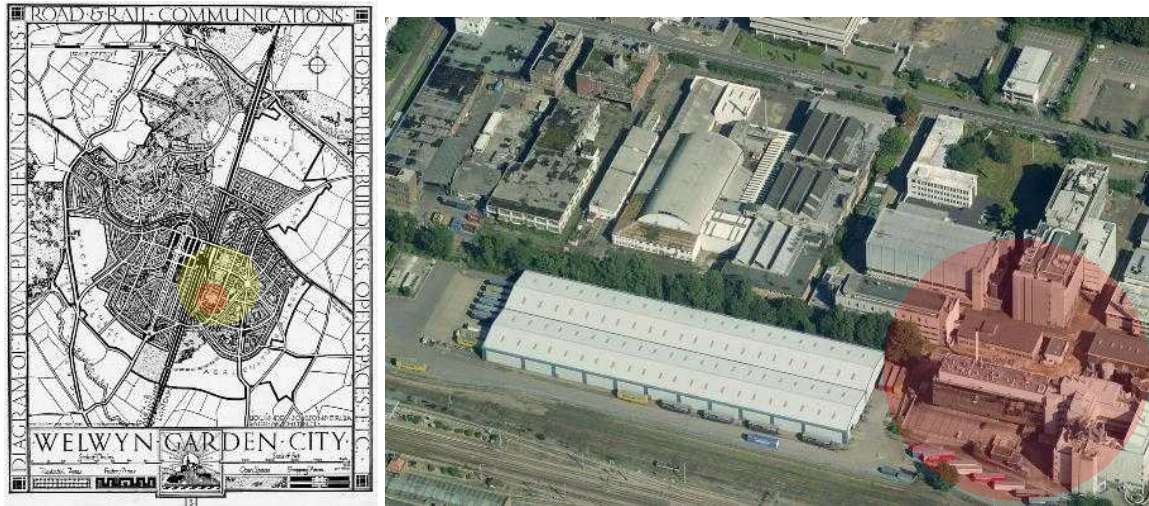


Figure 74. Left 1920s historic masterplan, right aerial view of townscape area. Approximate location of the area indicated in yellow and the site indicated in red.

L Shirepark Business Area

- 10.13 This townscape character area is located to the north of the site, it is not within a conservation area and is considered **poor** value in townscape terms, falling just within the area of townscape sensitivity. While this area formed part of the original masterplan, reflecting the location of the industrial zone, the loss of active industry has prompted a wave of conversion and redevelopment so that office use now dominates. As such the majority of the built fabric dates to the twentieth century and comprises generic office architecture without interest. The character area only just falls within the area of townscape sensitivity, and due to distance from the site, lack of architectural relationship and views this area has been scoped out of assessment. The contribution of the site is **nil**.

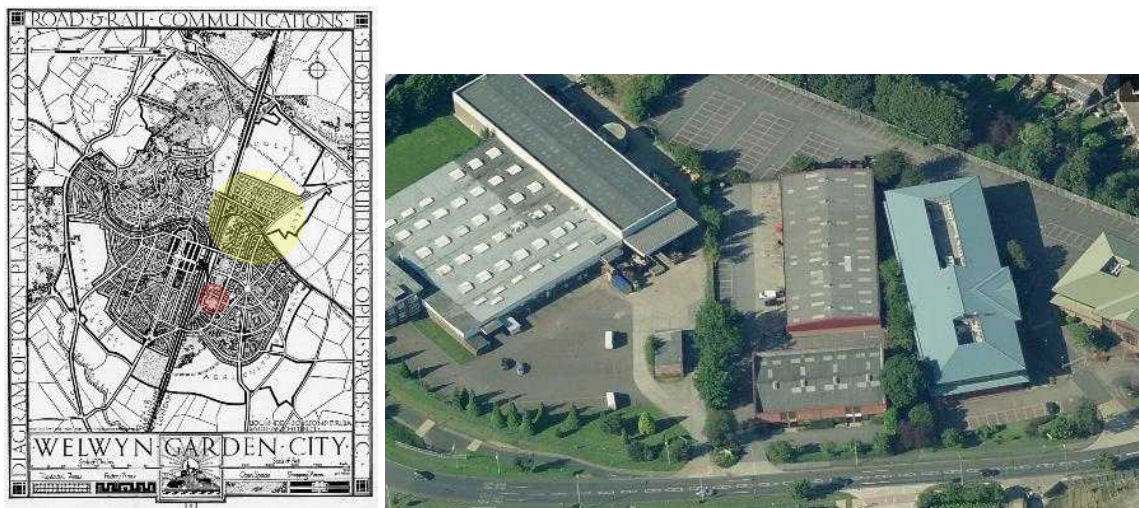


Figure 75. Left 1920s historic masterplan, right aerial view of townscape area. Approximate location of the area indicated in yellow and the site indicated in red.

M Peartree Modern Business Area

- 10.14 This character area is located to the north east of the site, it does not fall within a conservation area and it is considered of **poor** townscape value. While the area was designated within the masterplan of Welwyn as part of the industrial zone, the area has seen substantial decline with large areas remaining derelict in recent history. The overall architectural character is incidental and utilitarian, despite proximity to the major arterial route of Broadwater Road. There is intervisibility between the site and this character area, with the upper portion of the Biopark building framing the end of the industrial area to the south, indicating the transition to residential areas. There is however very little shared character in terms of style either across the character area or with the site itself, beyond a clear industrial use. The present contribution of the site is therefore considered to be **neutral**. It is noted that the existing views will be filtered following the consented redevelopment of the currently cleared area to the south of the listed Shredded Wheat Factory. This consented development will alter the character of the existing views, creating a modern residential and commercial hub as well as screen views of the site itself.



Figure 76. Left 1920s historic masterplan, right aerial view of townscape area. Approximate location of the area indicated in yellow and the site indicated in red.

N Broadwater Crescent

- 10.15 This character area is located directly to the south of the site and is residential in character of **poor** townscape value, falling within the area of townscape sensitivity. The area is suburban and late twentieth century in character featuring two storey red brick houses following the clearance of the original 1920s structures in 1986. There is strong intervisibility between this character area and the site with a sharp contrast in terms of both use, scale massing and character clearly discernible. There is no apparent attempt in the existing structure to respond to the residential character of this area and the alignment of roads creating north south views looking directly towards the site further enhance this sense of dislocation, with the Biopark building dominant in the skyline. The present contribution of the site is therefore **negative**.



Figure 77. Left 1920s historic masterplan, right aerial view of townscape area. Approximate location of the area indicated in yellow and the site indicated in red.

O Eastern Welwyn Garden City

- 10.16 This expansive area is located to the south east of the site and is not within a conservation area, it is considered of **minor** townscape value, falling within the area of townscape sensitivity. The majority of the townscape area was constructed in the pre-war period, largely to house the factory workers nearby to the industrial zone. While there has been substantial areas of infill, there is a consistent low rise suburban feel with a web like street-pattern with curving roads and cul-de-sacs preventing a clear sense of hierarchy. As such while it is roughly of a similar date to that of the town centre to the west of the railway, there is a much tighter knit grain, somewhat diluting the spaciousness first envisioned by De Soissons. The character is consistent with short terraces of one to two storey houses comprising the majority of the buildings, however the style of the buildings is varied creating a lack of clear identity. Due to the fall of the land and meandering quality of the streets there is very limited intervisibility within the site. Whilst the on site assessment has not included every street, no glimpses of the site were identified during the site visit. The contribution of the site to the character area is therefore **nil**.



Figure 78. Left 1920s historic masterplan, right aerial view of townscape area. Approximate location of the area indicated in yellow and the site indicated in red.

P Peartree Conservation Area

- 10.17 This character area is to the south east of the site and is a designated conservation area of **moderate** townscape value, falling within the area of townscape sensitivity. Originally farm land, De Soissons incorporated existing historic routes into a planned neighbourhood. The provision of lower income housing is expressed in the change in density when compared to the city to the west of the railway line. There are further distinctions including architectural detail, but the broader tenets of Garden City design in terms of wide leafy avenues is in evidence. The houses are largely brick with simple Neo-Georgian decorative details. The conservation area is divided into three sub character areas, including a group of retail, community and ecclesiastical buildings, with large areas of open space reflecting the public use. The site is presently not perceptible from the conservation area and the contribution is therefore **nil**. While not all streets within the conservation area were assessed, no views were identified as part of the site visit.



Figure 79. Left 1920s historic masterplan, right aerial view of townscape area. Approximate location of the area indicated in yellow and the site indicated in red.

Q King George 5th Park

- 10.18 This character area is to the south east of the site, it is not within a conservation area and it is of **moderate** townscape value, falling outside the radius of townscape sensitivity. This character area comprises a public open recreational space and the immediate surrounding streets which contain a number of public uses. The land rises slightly to the north west, and the site is therefore currently not perceptible. This character area has been scoped out of further assessment, with the present contribution of the site being **nil**.

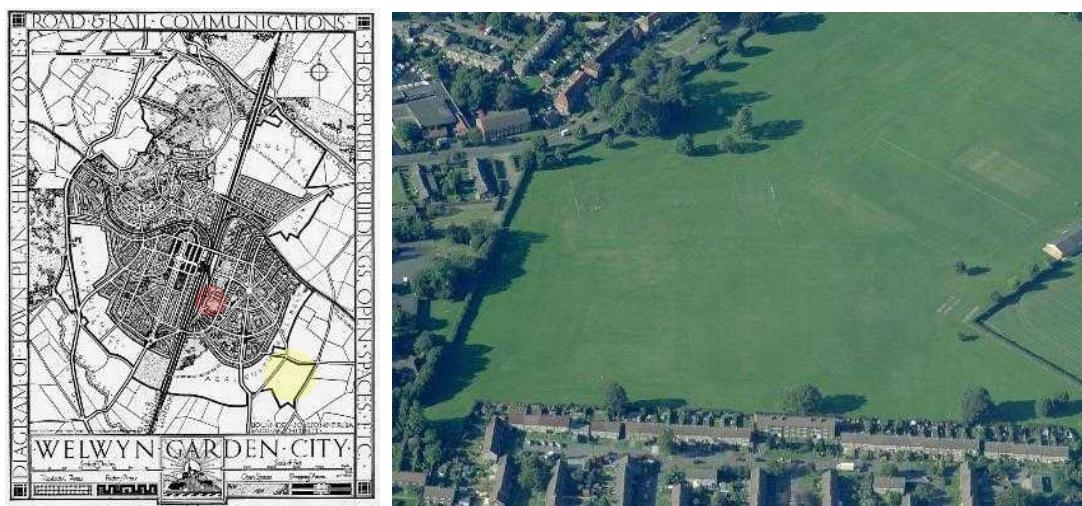


Figure 80. Left 1920s historic masterplan, right aerial view of townscape area. Approximate location of the area indicated in yellow and the site indicated in red.

R Beehive Conservation Area

- 10.19 This character area is located to the south east of the site, it is a designated conservation area of **moderate** townscape value, falling outside of the radius of townscape sensitivity. The area presents one of the first residential developments completed following the 1947 New Town designation. The buildings were constructed through out two phases, retaining open spaces and utilising a 'step and stagger' street grain in order to create a unfolding varied streetscape. The area is however largely of denser development. There is presently no visibility between the area and the site due to distance, the rise of the land to the north west and intervening development. This area has therefore been scoped out of assessment, the site make a **nil** contribution.

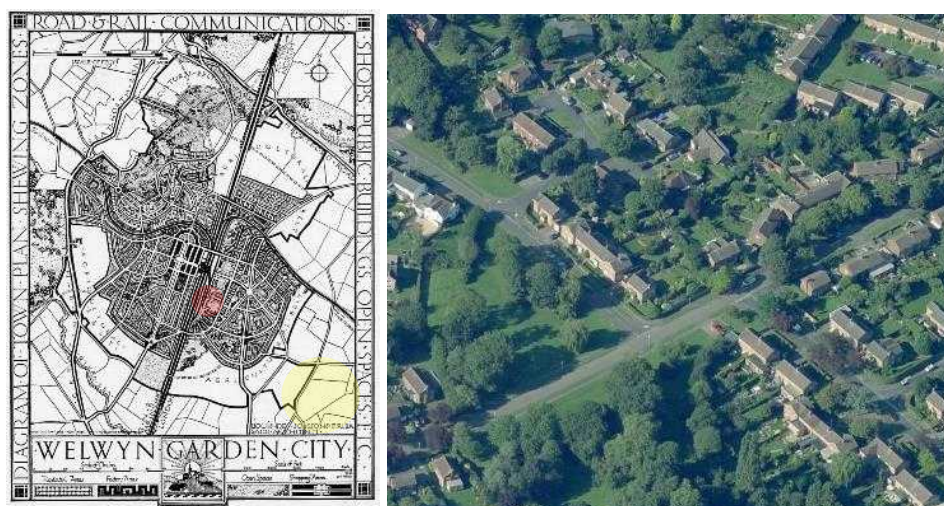


Figure 81. Left 1920s historic masterplan, right aerial view of townscape area. Approximate location of the area indicated in yellow and the site indicated in red.

CHARACTER AREA	WITHIN AREA OF SENSITIVITY	TOWNSCAPE VALUE	CONTRIBUTION OF THE SITE	SCOPED IN/ OUT
A Sherrards Park	no	moderate	nil	out
B Shire Park	no	minor	nil	out
C The Campus	no	moderate	nil	out
D Parkway Commercial Town Centre	yes	moderate	neutral	in
E Handside Lane	no	moderate	nil	out
F Barleycroft Road	yes	minor	nil	out
G Turmore Dale	yes	moderate	nil	out
H Chequer Park Lane	yes	poor	negative	in
I Parkway Residential Area	yes	moderate	nil	out
J Longcroft Lane	yes	moderate	negative	in
K Industrial Zone	yes	minor	negative	in
L Shirepark Business Area	yes	poor	nil	out
M Peartree modern business area	yes	poor	neutral	in
N Broadwater Crescent	yes	poor	negative	in
O Eastern Welwyn Garden City	yes	minor	nil	out
P Peartree Conservation Area	yes	moderate	nil	out
Q King George 5th Park	no	moderate	nil	out
R Beehive Conservation Area	no	moderate	nil	out

11.0 Assessment of Impact

Listed Building considerations

- 11.1 The statutory duty under Section 16(2) states “In considering whether to grant listed building consent for any works the local planning authority or the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.”
- 11.2 Section 66(1) of the Planning (Listed Building and Conservation Areas) Act 1990 sets out that any development should “have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.”
- 11.3 ‘Setting’ is defined as the “surroundings in which the asset is experienced”, and a reduction in the ability to appreciate the existing character of this site may result in a reduction in the ability to appreciate the identified listed buildings in a setting which supports their significance.
- 11.4 If elements of harm are identified as a result of the proposed development, in order to accord with the national policy, this potential harm would need to be clearly outweighed by “public benefits”.

Conservation Area considerations

- 11.5 The statutory duty under section 72(1) of the Planning (Listed Building and Conservation Areas) Act 1990 sets out that special attention shall be paid to “the desirability of preserving or enhancing the character or appearance of the Conservation Area”. When considering the proposed site within the context of the Conservation Area, it is important to consider the historic use and relationship of the site but also views in, out and through the site, and the contribution these make to the setting and significance of the Conservation Areas.
- 11.6 When considering the impact of the proposals on these assets, under the relevant policies of the National Planning Policy Framework (NPPF) paragraphs 193-196, it should be noted that it is the overall effect of the proposals on the appearance of the Conservation Area which should be considered - taking into account any adverse and beneficial impacts arising.
- 11.7 To accord with national policy, any potential harm arising from the development would need to be clearly outweighed by “public benefits” arising from the development. Public benefits could be achieved in a number of ways to be explored through the evolution of the proposals and their content. They could also entail ‘heritage benefits’, by which existing heritage considerations could be improved as a result of the proposals.

Existing Townscape Context

- 11.8 The site has been found to be located in a low sensitivity area, with historic and ongoing redevelopment, removing much of the original character of the Site and immediate surroundings. This contrasts with the majority of Welwyn Garden City, with the carefully orchestrated historic planned townscape still appreciable.
- 11.9 As a result of the historic ‘zoning’ of the city, the site and immediate surroundings have an appreciably distinct character from that of the wider townscape. Following the decline of industry within the town centre, the site and surroundings to the north have been allocated for

redevelopment and a detailed Supplementary Planning Document outlines the original development strategy for the area to the north, which has now been partially enacted.

Assessment of Impact



A existing west elevation



A existing & proposed west elevation

Figure 82. Comparison of existing and proposed massing across the site. Top west elevation. Bottom east elevation



Figure 83. Heights across the site.

- 11.10 The emerging proposals are for the redevelopment of the site, to provide a residential development of 293 units with associated private and communal amenity space, public open space, car and cycle parking and landscaping.
- 11.11 The massing of the proposals have been developed to be stepped across the site, creating a sense of permeability in long and medium distance views. A change in materiality provides further articulation and visual interest. The proposed development takes its cues from the angular style and strong geometry of the consented proposals within the Wheat District development, creating a cohesive sense of place across the site. The proposals can be seen to retain the prominence of the Shredded Wheat Factory as primary structure within the historic industrial 'zone' as well as the preserving the quality of the formal vistas within the conservation area to the west. The design has been developed with regard to the consented development to the north of the Grade II listed former Roche Office, creating a strong sense of place through the use of a mix of building typologies. This includes a terrace house with a gable end to Broadwater Lane, before a taller art-deco inspired structure responds to the quality of the Roche Building enabling a transition from the residential suburban surroundings to the denser consented development west of Broadwater Lane. The massing within the site has been moved west to create a more open quality between the existing residential housing and the buildings within the site. This creates a sense of identity and differentiation within the site. Height builds towards the railway line to the west and north, reflecting the transition between residential areas to the south and east to the historic industrial zone to the north.

Impact to Heritage Assets

- 11.12 It is noted that the SPD directs that redevelopment should retain the dominance of the Shredded Wheat Factory as well as views of Roche Products Factory Building from Broadwater Road, both Grade II listed buildings. It is noted that it is the prominence of the Shredded Wheat silos in particular within the skyline that the SPD seeks to protect, and these views are preserved.

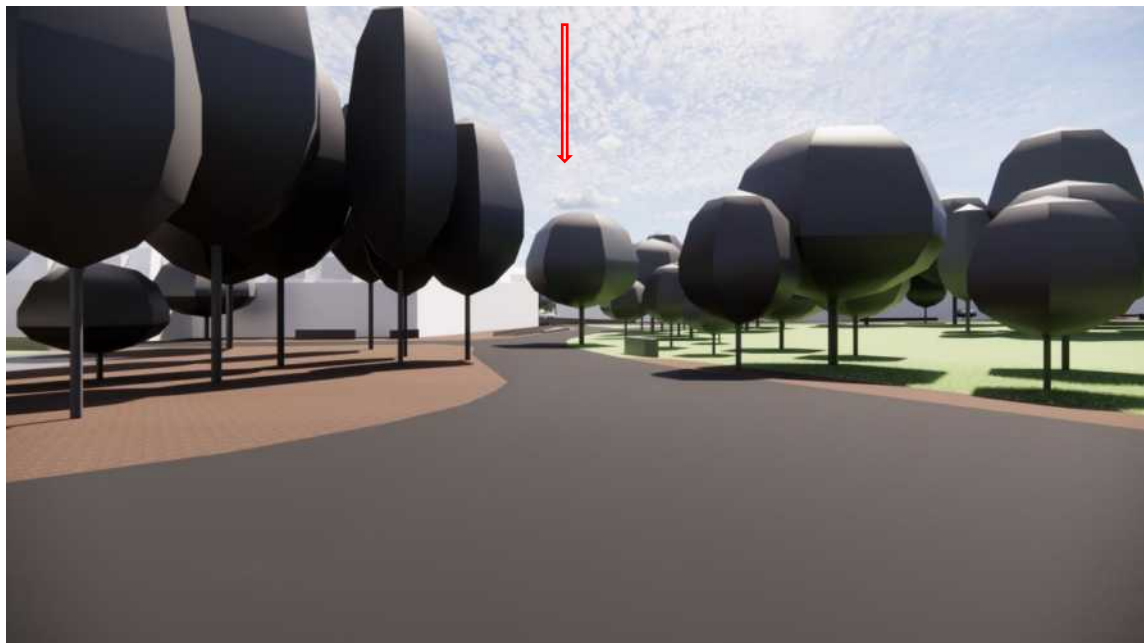
- 11.13 Both structures are clearly visible from the site and the Shredded Wheat Factory in particular, due to its height, possesses a landmark quality, clearly denoting the location of the industrial zone when seen from both west of the railway line as well as to the north.
- 11.14 The present quality of the site has been found to have a similar landmark quality, making it significantly taller than the majority of the buildings within the industrial zone, save that of the remaining structures within the Shredded Wheat Factory complex. As such the site as existing is considered to create the impression of a 'bookend', signalling both the termination of the industrial zone along Broadwater Road to the south as well as proximity to the railway line. The retention of this sense of height within the proposals and contrast within the surroundings is therefore seen to have a neutral impact on the surrounding townscape areas and heritage assets. An assessment of the viewpoints has shown that the proposals will retain the existing views of the Shredded Wheat Factory and Former Roche Office, whilst improving the backdrop of these views with a more responsive design, that reflects the architectural quality of the listed buildings, having a **moderate beneficial** impact upon their wider setting and significance. This includes the retention of the prominence of the silos across the site.
- 11.15 The present architectural quality of the buildings within the site has been found to be indifferent. The negative impact of this indifferent quality is amplified, given the long-range views of the site, including within the conservation area to the west, such as along Longcroft Gardens. The proposals are considered to improve the quality of these existing views with a new building which reflects the considerable historical importance of the industrial zone within Welwyn Garden City. This area has historically supported an array of styles, with many buildings constructed by architectural and industrial designers of note. While the present buildings on site do not have this historic or agricultural quality, there is a clear opportunity to improve the contribution of the site to the surroundings and provide a **moderate beneficial** impact on the wider setting of the Welwyn Garden City Conservation Area.
- 11.16 While it is acknowledged that long range views of the site from Hatfield House and Hatfield House Park and Garden have been identified in previous applications (6/2018/0171/MAJ), these views were not perceptible from accessible areas at the time of the site visit. Due to the considerable distance from the site, existing views of the wider Welwyn Garden City include just perceptible glimpses of the Shredded Wheat Factory and Biopark Building, the impact of the proposals upon these existing views considered to be **neutral**.

Summary of Impact

ASSET	DESIGNATION	SENSITIVITY	CONTRIBUTION OF SITE	IMPACT OF PROPOSALS
Shredded Wheat Factory	Grade II	Low	Negative	Moderate beneficial
Former Roche Office Building	Grade II	Low	Negative	Moderate beneficial
Hatfield House	Grade I	High	Negligible	Neutral
Welwyn Garden City Conservation Area	n/a	Low	Negative	Moderate beneficial
Hatfield House Park and Garden	Grade I	High	Negligible	Neutral

View point Assessment

View 1



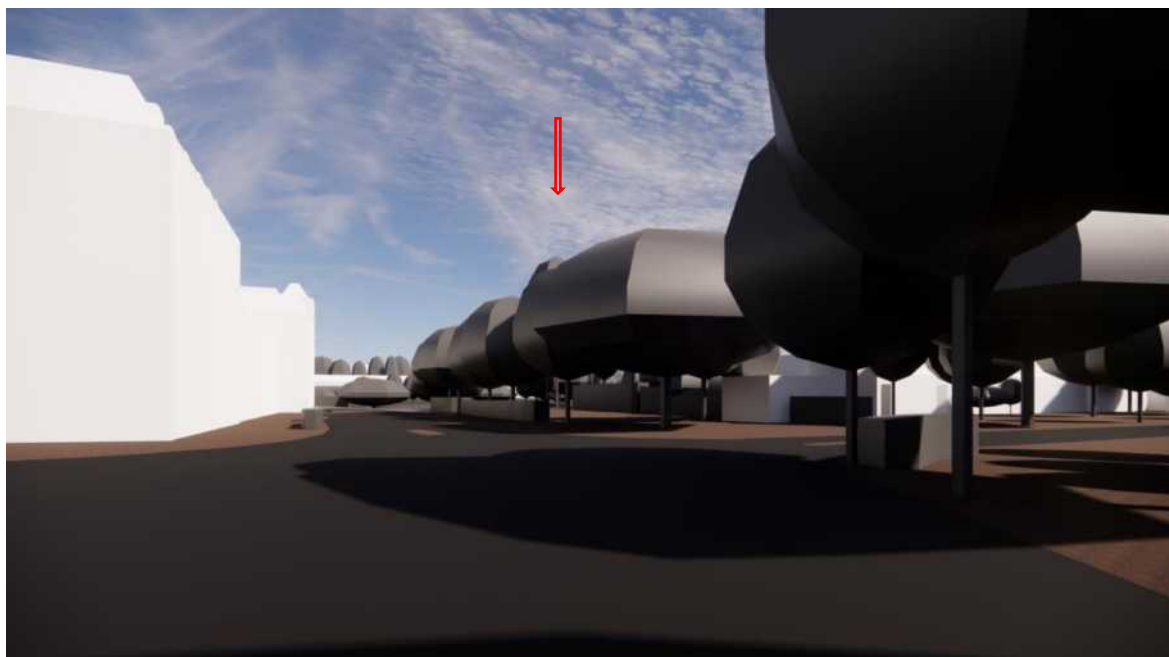
- 11.17 This view takes in the civic buildings which surround the commencement of the parkway. The character of the townscape is formal, with a strong geometric pattern to the streetscape. There are distant, partial, filtered, very slight glimpses of the site from this view point, seen between other structures. The quality of the buildings within the site are utilitarian, and this character contrasts with the decorative facades which surround the semi-circle of open space. These views of the site are however aligned away from the formal axial view down the parkway. The current contribution of the site to this view is **negligible**. The very slight views of the site are improved by a more resolved and residential appearance, sitting more comfortably within the character of this view. This results in a **minor beneficial** impact.

View 2



- 11.18 This view takes in the commercial centre of the parkway, showing a mixture of modern shopfronts within older twentieth century shopping parades. The formal axial arrangement of the streetscape is reflective of the original masterplan designed by De Soissons. The site is not visible from this view point and makes a **nil** contribution. The proposals do not change the existing character of this view and the overall result is **neutral**.

View 3



- 11.19 The quality of this view is of a subsidiary street, looking along an access road to the carpark to the south of the town centre. This view takes in the planting which surrounds the railway line, further establishing a back-land quality. The site can be glimpsed partially above the horizon line. The architectural quality of the façade does not respond to this view from the conservation area, enhancing the backland character. The overall contribution is diminished by distance however it remains **negative** overall. The CGI indicates the proposals will be just visible behind the tree belt, improving the existing glimpse of the site, creating a more consistent view when seen from this area. This results in an overall **minor beneficial impact**.

View 4



- 11.20 This view reflects the original residential townscape designed by De Soissons, comprising early twentieth century housing with neo-Georgian details forming short terrace rows. The houses are set back from the street front creating a spacious character which aligns with the Garden City principles. The site is not visible in this view, screened by trees surrounding the railway line which sits in between the site and this area of the conservation area. The contribution of the site to this view is therefore **nil**.
- 11.21 The CGI shows the site just visible, and will be screened behind the existing vegetation. The resulting impact is considered to be **neutral**.

View 5



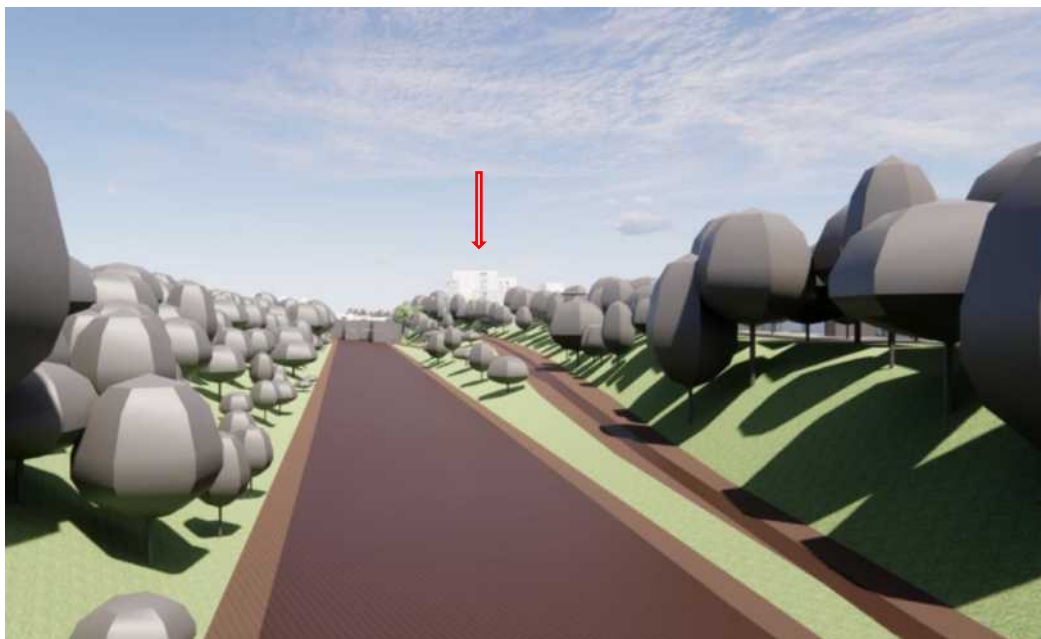
- 11.22 As with view four this view reflects the original residential townscape designed by De Soissons. Small garages can be seen to sit between each terrace row, creating a drop in the horizon line. The site can be glimpsed within these gaps in the terraces, taking in the substantial irregular massing of the plant work to the roofline. The site therefore does not respond to the architecture within the conservation area either in terms of materiality use or massing. The site makes a **negative** contribution therefore in townscape terms within these views.
- 11.23 The proposals will similarly be visible above the roofline of the suburban houses, expressing the existing indifferent appearance of the site with a residential character. The impact of the proposals is therefore considered to be **minor beneficial**.

View 6



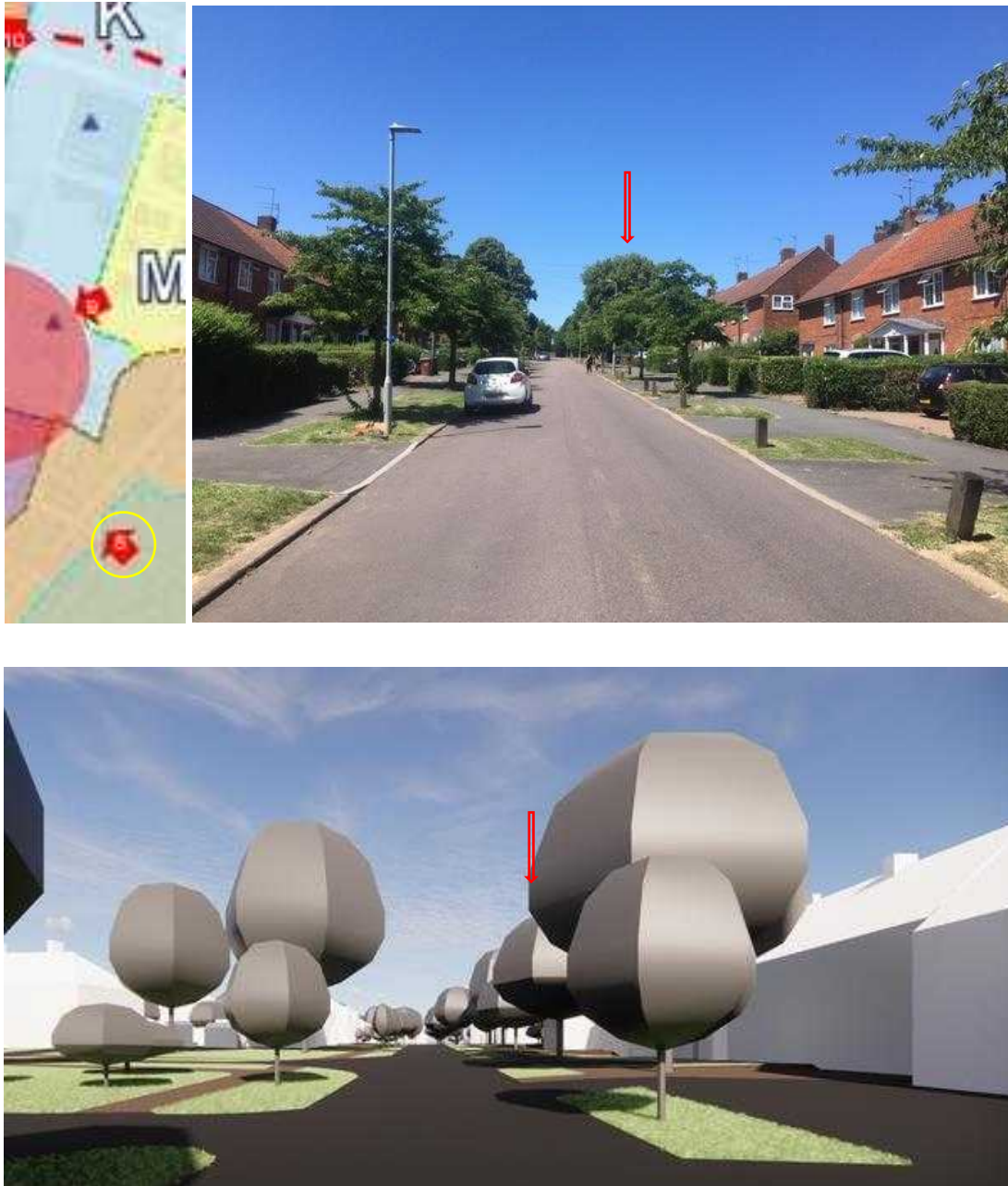
- 11.24 This view takes in the late twentieth century redeveloped suburban houses to the immediate south of the site. The site presently dominates in this view terminating views along the street-front. The overwhelming impact is **negative**, with the extreme contrast in terms of use apparent through the clear views of plant work to the roof line within the site. The contribution of the site to this view is therefore negative.
- 11.25 The proposals will replace the existing building with responsive contextual building, residential in character. The prominent appearance of the site from within this view point results in a **substantial beneficial** impact.

View 7



- 11.26 This view takes in the railway line which divorces the site from the conservation area to the west. The site is clearly visible, breaking above the horizon line. The existing quality of this view is industrial and the architecture within the site does not respond to the high degree of visibility from this vantage point, it has an overall **negative** contribution to the quality of the townscape.
- 11.27 The proposals will replace the existing appearance of the buildings with a high quality architectural intervention which responds to the long distance views of the site from this direction. This results in a **substantial beneficial impact**.

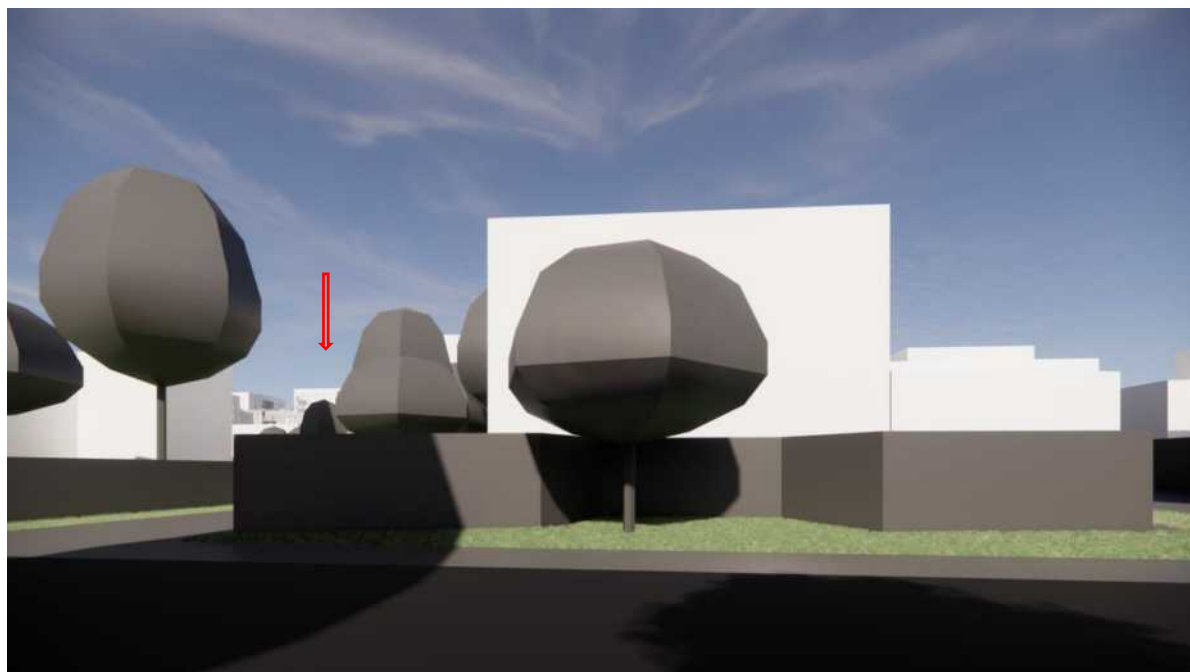
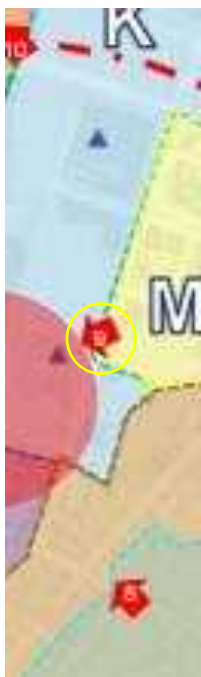
View 8



11.28 This view is reflective of the Garden City Principles showcasing a small residential development which is known to have been included within early iterations of the master plan by Welwyn Garden City by De Soissons. While it is smaller in scale than some of the residential streets within the town centre, this reflects the intention to provide housing for workers within the nearby industrial zone. The site is not perceptible in this view and makes a **negligible** contribution.

11.29 Due to distance from the site the overall impact of the proposals is **neutral**.

View 9



- 11.30 This view looks across the recently redeveloped area of land surrounding the Grade II listed Former Roche Office buildings. The quality of the townscape lacks a preserved historic character seen elsewhere within the conservation area and town centre. The site is seen beyond the consented recent development, and is dominant in the skyline. Unlike the listed building and surrounding modern housing, the architecture within the site is indifferent in quality and lacks the consideration and interest seen in the other buildings visible within this view. The contribution of the site to this view is therefore **negative**.

- 11.31 The proposals can be seen to respond more to the architectural quality of the nearby listed building as well as the redevelopment of the industrial quarter. This results in a **minor beneficial** impact.

View 10



- 11.32 The quality of the townscape seen within this view has a black land character, taking in the industrial elements of the railway as well as the side elevations of both the Biopark building within the site as well as the Shredded Wheat building in the distance. The site lacks the moderne character seen within the Shredded Wheat building, and does not compare in terms of decorative interest. While both buildings are clearly visible, the site falls short of the design quality and historic interest evident in the Shredded Wheat Building. The contribution of the site to this view is therefore considered to be **negative**. The proposals improve upon the existing

view, with contextual buildings with a residential character that responds to the historic industrial zone character. This results in a **substantial beneficial** impact.

Impact to Townscape Character Areas and Viewpoints

- 11.33 It has been demonstrated that the proposal has no impact upon the currently enclosed views within the town centre to the west. It is noted that the town centre possesses a formal geometry and carefully orchestrated views north-south along the Parkway. Through the location of the site to the south east, these views will be protected in full.
- 11.34 While the proposals will be visible in the existing glimpsed and views of the site, it is considered the more responsive design of the proposals which have sought to acknowledge the long range visibility of the site will be have a **moderate beneficial impact**. Similarly through a sensitive pallet of materials and domestic character, the proposals are considered to improve the dramatic existing view points of the site from the railway bridges as well as from Broadwater Crescent to the south, resulting in a **substantial beneficial impact**. The existing contribution of the site to these views has been found to be negative, and the proposals constitute a significant improvement in townscape terms.

Summary of Impact

RECEPTOR	EXISTING CONTRIBUTION OF THE SITE	IMPACT OF PROPOSALS
D Parkway Commercial Town Centre	neutral	neutral
H Chequer Park Lane	negative	Minor beneficial
J Longcroft Lane	negative	Minor beneficial
K Industrial Zone	negative	Substantial beneficial
M Peartree modern business area	neutral	Minor beneficial
N Broadwater Crescent	negative	Substantial beneficial
View 1	negligible	Minor beneficial
View 2	nil	neutral
View 3	negative	Minor beneficial
View 4	nil	neutral
View 5	negative	Minor beneficial
View 6	negative	Substantial beneficial
View 7	negative	Substantial beneficial
View 8	negligible	neutral
View 9	negative	Minor beneficial
View 10	negative	Substantial beneficial

- 11.35 The proposals have therefore been found to constitute a neutral impact in heritage terms whilst improving the quality of the townscape in the site's surroundings, creating a strong sense of place and identity in keeping with the Garden City Principles.

APPENDIX 1

STATUTORY LIST DESCRIPTIONS

HATFIELD HOUSE PARK AND GARDEN

Grade: I

List Entry Number: 1000343

Date first listed: 11-Jun-1987



Details

An early C17 country mansion surrounded by extensive and complex gardens and park, created from the medieval parks of Hatfield. Robert Cecil's formal, early C17 gardens were created with input from designers including Thomas Chaundler and Salomon de Caus, and planted by John Tradescant the elder, at that time the head gardener. The gardens were landscaped in the C18, but then remodelled and extended in the C19 and C20.

NOTE This entry is a summary. Because of the complexity of this site, the standard Register entry format would convey neither an adequate description nor a satisfactory account of the development of the landscape. The user is advised to consult the references given below for more detailed accounts. Many Listed Buildings exist within the site, not all of which have been here referred to. Descriptions of these are to be found in the List of Buildings of Special Architectural or Historic Interest produced by the Department of Culture, Media and Sport.

HISTORIC DEVELOPMENT

The bishops of Ely owned a house and park at Hatfield from at least the C13 (VCH). Hatfield Palace was built c 1480-97 by Cardinal John Morton, Bishop of Ely and minister of Henry VII, with formal garden compartments along the south side (ibid). Henry VIII acquired the estate during the Dissolution of the Monasteries and it was here that Queen Elizabeth was brought news of her accession in 1558. Her first three Councils were held in the hall of the Palace. The estate was exchanged in 1607 by James I for Robert Cecil's Theobalds Palace (Herts). Cecil (1563-1612, cr first Earl of Salisbury 1605) pulled down three sides of the Palace, leaving the hall, and built a new house close by to the south-east, flanked by gardens to the west and east. The eastern gardens were overlooked by the family's private apartments, and were the main formal gardens, being walled and terraced in an Italianate form which was influential on other contemporary gardens. A vineyard was constructed within a walled enclosure in the park, at some distance from the house.

Cecil's gardener from Theobalds, Mountain Jennings, collaborated with Robert Bell, a London merchant and garden expert, in drawing up garden plans. One 'Bartholomew the gardener' agreed to act as a consultant initially, with Jennings and Bell; various other advisers were used during the course of construction. Thomas Chaundler laid out the splendid East Garden c 1610-11, with waterworks by a Dutchman, Simon Sturtevant. By late 1611 Chaundler had been replaced by Salomon de Caus who worked on the gardens until mid 1612. John Tradescant the elder became gardener at Hatfield at this time, supervising the planting of the gardens, the plants including rare specimens from abroad, some collected by Tradescant himself (Strong 1979). Lord Salisbury died deeply in debt in 1612, just before the house was finished.

The estate remained in the possession of the Cecils, the park being extended to the environs of Hatfield House in the late C18 by Emily, the first Marchioness, and the park and gardens landscaped (gardens guide 1989). Dury and Andrews' map shows the estate c 1766 with formal gardens around the House, and the vineyard enclosing formal features; Watts' engraving (1779) shows the park sweeping up to the walls of the House on the south and east sides. In the mid C19 James, the second Marquess, recreated terraces around the House, although these were built higher and wider than the C17 originals. He also laid out new parterres and a maze on the remains of the C17 work to the west and east of the House. In the late C20 Marjorie, the sixth Marchioness remade the gardens, creating several new features, including works in the East Gardens and two sunken parterres in the courtyard on the south front. The estate remains (1999) in private ownership.

SUMMARY DESCRIPTION

Hatfield Park lies c 30km north of the centre of London, adjacent to the east side of the village of Hatfield, and incorporates several former medieval hunting parks. The c 7.5 sq km site is defined to the west largely by the former Great North Road, now (1999) the A1000, apart from a section north-west of the House which is bounded by the village. The site is bounded to the north by the A414, to the east by agricultural land and woodland, and to the south-east by a lane linking the Great North Road with the settlement of Lower Woodside. The ground is gently undulating, with a plateau towards the west boundary, on which stand the House and Old Palace. The setting is rural to the east, with the new town of Hatfield adjacent to the west, and several villages to the south.

Hatfield House (1607-12, listed grade I) stands at the west edge of the park on a level plateau, approached via several drives and avenues. The present main approach (late C19) enters 500m north-west of the House, off the Great North Road, directly from the west side of Hatfield village, opposite the railway station. The broad gateway (late C19, listed grade II), set back off the road and flanked by low, curved brick walls, comprises two carriage entrances, each flanked by carved stone piers surmounted by stone lions and separated by an iron screen in similar style to the gates. In front of the screen stands a tall stone plinth supporting a seated statue of the third Marquess of Salisbury (G Frampton 1906, listed grade II), three times Prime Minister of Great Britain, who erected the gateway in order to provide access to the newly built station. From here the drive is carried 120m east on an embankment to a brick bridge which takes it high across the main village street, Park Street, to the entrance to the park. The drive continues 250m east to join the north drive at a point 300m north of the House. The north drive was, before the west entrance was built in the late C19, one of the principal approaches. The north drive, aligned on the north front of the House, enters the park from the Great North Road 1.2km north of the House, via a brick gatehouse. It extends south flanked initially by woodland, opening out into the park c 500m north of the House, from here continuing southwards flanked by a double avenue. Some 60m north of the House the drive enters the square, gravelled forecourt between terracotta ornamental posts (mid/late C19, listed grade II).

The forecourt (walls and gates 1845 and late C19, by the second and third Marquesses of Salisbury, listed grade II) is enclosed on three sides by ornamental red-brick and terracotta walls, with two further gateways, in similar style to the central gateway, at the west and east ends of the north wall. The fourth, south side is taken up by the north front of the House, at the centre of which a broad stone staircase (C19) leads up to the central front door. Beyond the west and east ends of the north front of the House, set into the south ends of the west and east forecourt walls respectively, stand two pairs of tall, brick and stone, polygonal gate piers with iron gates (listed as part of the forecourt), giving access to the West and East Gardens beyond.

The former south approach (the main C17 approach), is now (1999) disused. The course of the former south drive is aligned on the centre of the south front. The remaining southern section enters off the Great North Road at a lodge, 2km south of the House. The drive extends north through the wooded Millward's Park, crossing, 850m south of the House, a further avenue giving access from the Great North Road to the north-west and the Pepper Pot Lodges (C17, listed grade II) on Woodside Lane to the south-east. This avenue marks the former course of the Great North Road, before it was moved to the south-west side of Millward's Park in the C19. The south drive ends at the cross drive, its former course northwards being marked by a grass ride flanked by a broad avenue of lime trees. The ride terminates 60m south of the House at a further forecourt (pavilions C17, restored c 1845; gates and walls c 1845, listed grade II) enclosed by low brick and terracotta walls. The entrance at the centre of the south side is marked by an iron screen and gates flanked by four brick and stone piers. Single-storey brick and stone pavilions are set into the west and east walls. Within the forecourt a broad gravel drive, flanked by late C20 sunken parterres, leads to the carriage sweep on the south front, adjacent to a stone loggia in which is set the central south entrance. Several other drives also traverse the park.

A series of formal gardens, the West Gardens, extends from the west front, overlooked by the C19 west terrace. The Privy Garden, lying below the terrace and bounded by a lime walk, contains the West Parterre. To the west of the Privy Garden lies the lower Scented Garden, occupying the site of a former kitchen garden, with a raised walk running along the west side. The Wilderness Garden extends 350m

south from these formal gardens, alongside the south avenue ride, incorporating the remains of C19 wooded pleasure grounds.

At the north-west corner of the West Gardens, 90m north-west of the House, stands the remains of the Old Palace (1480-97), overlooking to the east a garden made amongst the foundations of the three wings which were demolished in the early C17. A forecourt lies on the west side of the Old Palace, bounded to the north by the present stable yard and to the west by the churchyard of Hatfield parish church. A brick gatehouse at the north-west corner of the forecourt provides direct access from the village via Fore Street.

The East Gardens, a series of terraced gardens, lead down a slope from the east front, overlooked by the C19 east terrace. They occupy the site of the main area of early C17 gardens laid out for the first Earl of Salisbury, these having been largely rebuilt in the 1840s and restored in the late C20. A double flight of steps leads down from the east terrace to the east parterre, flanked to the north by a late C20 kitchen garden and to the south by an orchard and the Mount Garden. From the East Parterre a flight of steps leads down to the Maze Garden (maze 1840s, restored mid(late C20), and below this the Pool Garden, containing a swimming pool set in lawn and enclosed by clipped yew hedges. Beyond this to the east lies the New Pond and Wild Garden, an informal area of lawn and trees surrounding the irregularly shaped pond, the pond having been laid out during the initial garden works of the early C17.

Hatfield Park, surrounding the House to the south, east and north, is composed of several earlier parks, drawn together over successive centuries, including Middle Park and Innings Park. The central area surrounding the House and gardens is laid to pasture, with scattered trees, and contains several areas of woodland including Coombe Wood and Conduit Wood. The northern section, Home Park, is largely wooded, bounded to the north by the Hertford Road and bisected from west to east by the broadly curving Broadwater, made from the widened course of the River Lea. The Broadwater is straddled by the early C17 Vineyard, standing 1.2km north-east of the House within the Home Park Woodland. The rectangular Vineyard is surrounded by 4m high red-brick walls (early C17, listed grade II). Brick pavilions terminate the ends of the south wall in the southern half, with a Tudor-style cottage at the centre (these three listed with the walls), overlooking a series of earth terraces running down to the riverside. This section was laid out as a vineyard in the late C19 (OS 1879). The north half, formerly laid out as a kitchen garden (OS 1879), is bisected from west to east by a narrow arm of the river. It contains at the centre of the north side a late C18 Gothick-style pavilion, set into an angled recess at the centre of the wall.

The Lodge House (early C17, listed grade II), formerly the residence of the Ranger of Hatfield Park, stands towards the west side of Home Park, c 800m north-east of the House. The brick and timber-framed house stands within its own enclosure, surrounded by a garden wall with gate piers set into the south side (wall and piers early C18, listed grade II).

Millward's Park, the third (southern) main section of the park, lies south-west of the 2.2km long avenue linking Woodside Lane with the Great North Road. It is largely wooded, and crossed by woodland rides and the south drive, with to the north-west an open area of agricultural land enclosed on the west boundary with the Great North Road by a belt of trees.

The C19 kitchen gardens known as the New Gardens lie c 500m south-west of the House, surrounded by brick walls, with two main service compartments containing glasshouses adjacent to the north. The New Gardens, built to augment the kitchen gardens in the Vineyard in Home Park, have been superseded in the late C20 by a kitchen garden on the north side of the East Gardens, lying adjacent to the east side of the north forecourt.

REFERENCES

Note: There is a wealth of material about this site. The key references are cited below.

W Watts, *The Seats of the nobility and gentry in a collection of the most interesting and picturesque views* (1779), pl 53 *Country Life*, 1 (8 May 1897), pp 491-3; (15 May 1897), pp 519-22; 22 (14 December 1907), pp 872-83; 61 (12 March 1927), pp 390(7); (19 March 1927), pp 426-34; 175 (15 March 1984), pp 662-4; (22 March 1984), pp 770-2 *Victoria History of the County of Hertfordshire* 3, (1912), pp 91-100 R Strong, *The Renaissance Garden in England* (1979), pp 103-9 *Hatfield House, guidebook* (1984) *The Gardens at Hatfield House, guidebook*, (1989) M Batey and D Lambert, *The English Garden Tour* (1990), pp 40-6

Maps Hatfield estate map, 1607 (private collection) Dury and Andrews, *A topographical Map of Hartfordshire*, 1766 Tithe map for Hatfield parish, 1838 (Hertfordshire Record Office)

OS 6" to 1 mile: 1st edition published 1879 2nd edition published 1899 OS 25" to 1 mile: 2nd edition published 1898

HATFIELD HOUSE

Grade: I

List Entry Number: 1173363

Date first listed: 06-Feb-1952



County house. Built for Robert Cecil, first Earl of Salisbury, between 1607 and 1612. Designed by Robert Liming or Lyminge, assisted by Robert Cecil, his friend Thomas Wilson, and probably by Simon Basyll and Inigo Jones. The W wing was gutted by fire in 1835 and redecorated by the second marquess (d. 1868), who also did much decoration in other parts of the house.

Red brick with stone dressings. E-shape.

3 storeys and attic over basement. Stone mullioned and transomed windows of 2 to 6 lights. N entrance elevation is 15 windows. Central 3-storey porch bay with arched, shell-headed door flanked by pairs of fluted Roman Doric columns. Strapwork to pedestals, frieze and overthrow. C19 steps in 2 flights. 4-window flanking walls have 2-storey canted window bays near 3-window end projections. End projections have 3 and a half storey tower projections, formerly with cupola domes. The basement has a moulded plinth and 2 4-centre doors on each side of the right hand end pavilion. Main south front has a 9-window loggia in ashlar stone. The central feature is a 3-stage triumphal entrance with pairs of Doric, Ionic and Corinthian columns at each level. Double doors like those of N elevation. Strapwork to columns and pedestals. Large coat of arms to third stage and 1611 date on parapet. Top stage renewed 1982. Loggia either side was enclosed by stone trellis-work windows c1846, when much of the stone work of the front was probably restored. Ground and 1st floor Doric and Ionic fluted pilasters with carved pedestals and strapwork friezes. Strapwork parapet renewed c1950. Upper floor windows have bracketed sills. Flanking sides of courtyard are 6 windows: 3 2-storey bay windows alternating with 2-light openings and 3-light attic windows with strapwork semicircular crests. Doric doorways with similar crests. W side has large chapel window with 2-storey 12-arched light windows. End elevations of wings have square projecting turrets with leaded cupolas and strapwork parapets between them. Central 2-storey canted bay windows, that on W with C19 balcony and steps. E and W elevations are two part compositions. N parts have 3 canted 2-storey window bays with flat parapets. Recessed narrow gabled central bay. S part with two small gables. Rising from the centre of the house is a 3-stage wooden clock tower. The bottom stage has triplets of Doric columns at the angles and triplet arches between. Cube-shape middle stage has clocks N and S and pairs of Ionic columns at angles. Arched octagonal turret with leaded cupola. This part is possibly by Inigo Jones.

Outstanding features of the interior are the Hall and Grand Staircase, both with wood carving by John Bucke. The hall screen has profuse Jacobean ornament and a projecting upper gallery, closed in the

C19. A second gallery is corbelled out of the E wall which has here two stone doorways. Hammerbeam ceiling with paintings by Taldini, brought in by Third Marquess, 1878. The Grand Staircase has richly carved balusters and newel posts, the newels of carved lions and cupids. The Summer Drawing Room, E of the staircase has a well-preserved original interior. The Chapel in the W range has a large E window with twelve panes of original stained glass. The secondary staircase in the W wing, called the Adam and Eve staircase, was remodelled in the C19, but retains of fire door surround of c1700 on the 1st floor. The Long Gallery has panelling in two tiers and divided by pilasters, the fireplaces and ceilings possibly C19. King James's Drawing Room on the E has a restored ceiling and a contemporary fireplace by Maximilian Colt. King James's Bedroom, adjoining, has a fireplace taken from the Summer Dining Room. (C.L. 11.8.1900; 28.6 and 5.7.1907; 14.12.1907; Pevsner (1977).

THE NABISCO SHREDDED WHEAT FACTORY

Grade: II

List Entry Number: 1101084

Date first listed: 16-Jan-1981



1925. Architect Louis de Soissons. Two concrete ranges, at right angles with links. Southern range consists of giant range of cylindrical concrete drums 15 bays long with flat oversailing capping with railings right over the whole top. Behind this is a plain attic storey with 28 plain windows with plain capping over. On one end elevation is a 3 bay projecting tower rising just above the main roof level.

At the west end of the range is a 2 bay wing with large windows, the southern bay of 3 storeys and the northern of 4. Flatroofs. Adjacent is a 7 bay, 4 storey block, with large windows divided by narrow piers and small scale structural divisions between the storeys, making it almost wholly glass. Flat oversailing capping at roof level.

OFFICE BLOCK (BUILDINGS 1 TO 4) TO ROCHE PRODUCTS FACTORY

Grade: II

List Entry Number: 1348142

Date first listed: 10-Oct-1980

Date of most recent amendment: 01-Apr-1981



2. 1938-40 by Otto R Salvisberg of Zurich in association with C Stanley Brown, with later additions. The original factory buildings lie in axis with but behind and to the left of the original administration block whose entrance is on its short end. The construction is of reinforced concrete and the factory buildings are steel framed; external surfaces are rendered in an off-white colour. The administration block is 2-storeyed with the bronze entrance doors set well back behind pilotis and with 7 narrow, deeply set vertical windows in the wall above. To the right, the principal staircase in a glazed door, the only feature to break the austere white cubic form of the group of buildings. The factory buildings 4-storeyed with single-storeyed spurs. Metal casement windows Georgian in proportion but closely set in long horizontal bands and the general horizontality of the building is further emphasized by the widely projecting flat roof.



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Annex D - Preliminary Ecological Appraisal

Green Environmental Consultants

**BIOPARK
BROADWATER ROAD
WELWYN GARDEN CITY
AL7 3AX**

ECOLOGICAL ASSESSMENT

August 2020

for:

Polyfield Property Limited

Report number: 1434/1

Green Environmental Consultants Ltd

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This report is formatted for double-sided printing and as a result has blank pages.

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Report	Andrew Palmer BSc (Hons), DipLA,	Jacqui Green CEcol, FCIEEM	22 August 2020

BIOPARK, BROADWATER ROAD, WELWYN GARDEN CITY, AL7 3AX
ECOLOGICAL IMPACT ASSESSMENT

CONTENTS

1	EXECUTIVE SUMMARY	1
2	INTRODUCTION AND OBJECTIVES	
2.1	Introduction	2
2.2	Objectives	2
2.3	Site Location	2
3	EVALUATION CRITERIA	
3.1	Baseline Ecological Conditions.....	3
3.2	Legislation.....	3
3.3	Planning	5
3.4	Ecological Evaluation.....	5
4	METHODS	
4.1	Desk Study	7
4.2	Habitat Survey	7
4.3	Scoping for Protected and Biodiversity Species	7
4.4	Bat Survey.....	7
4.5	Invasive Non-native Species	10
5	RESULTS	
5.1	Desk Study	10
5.2	Habitat Survey	12
5.3	Scoping for Protected and Biodiversity Species	13
5.4	Bat Survey.....	13
5.5	Invasive Non-native Species	14
6	DISCUSSION AND ANALYSIS OF RESULTS	
6.1	Discussion	14
6.2	Evaluation.....	15
7	RECOMMENDATIONS	
7.1	Further Surveys	15
7.2	Mitigation	15
7.3	Enhancement	17
8	CONCLUSIONS	18
9	BIBLIOGRAPHY	18
APPENDIX		
	Site Plan	21
	Photographs	22

LIMITATIONS AND EXCEPTIONS

Limitations of Surveys

This report records wildlife found during the survey and anecdotal evidence of some species. Access, seasonality and weather conditions may affect survey results. It does not record any animals or plants that may appear at other times of the year and were therefore not evident at the time(s) of the visit(s). Habitats outside the site boundary were only visited where considered appropriate and where access was available.

The behaviour of animals can be unpredictable and may not conform to standard patterns recorded in current scientific literature. Many species are highly mobile and can occupy a site which has previously held no potential for them and factors such as increasing habitat pressure can cause animals to occupy areas that were previously unoccupied, or which might be considered far from suitable. This report therefore cannot predict with absolute certainty that animal species will occur in apparently suitable locations or that they will not occur in locations or habitats which appear to be unsuitable.

Limitations of Report

This report takes into account the particular instructions and requirements of our client. It is not intended for and should not be relied upon by any third party and no responsibility is undertaken to any third party.

The Executive Summary, Conclusions and Recommendations sections of the report provide an overview and guidance only and should not be specifically relied upon until considered in the context of the whole report.

Interpretations and recommendations contained in the report represent our professional opinions, which were arrived at in accordance with currently accepted industry practices at the time of reporting and based on current legislation in force at that time.

Where the data available from previous reports, or for other subject matter supplied by the Client, have been used, it has been assumed that the information is correct. No responsibility can be accepted by us for inaccuracies within the data supplied.

The copyrights in this report and other plans and documents prepared by Green Environmental Consultants are owned by Green Environmental Consultants Ltd and no such report, plan or document may be reproduced, published or adapted without their written consent. Complete copies of this report may, however, be made and distributed by the Client as an expedient in dealing with matters related to its commission.

This report is prepared and written in the context of the proposals stated in the introduction to this report and should not be used in a differing context. Furthermore, new information, improved practices and legislation may necessitate an alteration to the report in whole or in part after its submission. Therefore, with any change in circumstances or after the expiry of two years from the date of the report, the report should be referred to us for re-assessment and, if necessary, reappraisal.

Scientific survey data will be shared with local biological records centre in accordance with the CIEEM professional code of conduct.

Please note that Green Environmental Consultants Ltd is an ecological consultancy. Any information relating to legal matters in this report is provided in good faith but does not purport in any way to give any advice on or interpretation of the law whatsoever. Professional legal advice should always be sought.

The data, advice and opinion which we have prepared and provided is true, and have been prepared and provided in accordance with the Chartered Institute of Ecology and Environmental Management's Code of Professional Conduct. I confirm that the opinions expressed are my true and professional *bona fide* opinions.

This ecological information is supplied in accordance with BS 42020 2013.



Jacqui Green BSc(Hons), MSc, CEcol, FCIEEM

1 EXECUTIVE SUMMARY

This report has been prepared by Green Environmental Consultants and concerns land and property at BioPark, Broadwater Road, Welwyn Garden City, Hertfordshire, AL7 3AX. The report comprises both a Preliminary Ecological Appraisal (PEA) and a Preliminary Bat Roost Assessment (PBRA) and, as no further work is required, is upgraded to an ecological (impact) assessment.

Description

The 1.2 ha site comprised five- and two-storey commercial buildings with underground and outdoor surface car parking. It was bounded by a mixture of residential and commercial buildings, railway sidings and an allotment.

Results

Overall, the habitats surveyed were of low ecological quality with mainly modern buildings and hard standings with only small areas of non-native tree and shrub species.

No evidence of European Protected Species (EPS) was found. Regarding bats, there was no evidence of roost activity and all buildings, structures and trees were categorised as holding negligible suitability for roosts. Boundary habitats were of moderate suitability for bat foraging and commuting on account of the presence of mature trees linking to adjacent green spaces. For all other protected and notable species, habitat suitability and connectivity were of negligible suitability to support their presence.

Common garden birds were present and likely to nest in trees. Feral Pigeons nested within the underground car park.

No invasive non-native species were found.

Further Surveys

No further ecological surveys are required.

Evaluation, Mitigation & Enhancement

There are no significant constraints to the redevelopment of the Site concerning biodiversity. However, to ensure that boundary habitats continue to remain suitable for nesting birds and commuting and foraging wildlife, as much existing vegetation should be retained as possible. Additionally, increases in nocturnal illumination should be mitigated to reduce potential impacts upon wildlife.

The proposed new green infrastructure will significantly enhance ecological opportunities throughout the site. Open spaces will include enhancements for wildlife, including new native and insect-friendly planting and new nesting and roosting opportunities will be provided.

Conclusions

- The Site was of low ecological value, and no further surveys are required.
- Ecological mitigation is required to ensure that redevelopment does not result in unnecessary impacts on adjacent wildlife habitats. Significant biodiversity enhancements are included within the proposals.

2 INTRODUCTION AND OBJECTIVES

2.1 Introduction

This report has been prepared by Green Environmental Consultants Ltd on behalf of Polyfield Property Ltd and relates to the proposed redevelopment of a commercial estate (Biopark) at Broadwater Road, Welwyn Garden City, AL7 3AX (the "Site"). It is centred on Ordnance Survey grid reference TL 23971254.

This report comprises both a Preliminary Ecological Appraisal (PEA) and a Preliminary Bat Roost Assessment (PBRA) and, as no further work is required, is upgraded to an ecological (impact) assessment. An ecological assessment informs the planning application with respect to demolition of existing properties on site and redevelopment for residential use, to include gardens, infrastructure and communal open space. It assesses constraints to development that may arise from ecological factors. The identification of protected species and important habitats is vital if the proposed development is to comply with legislation. Where necessary it allows work that may otherwise be detrimental to wildlife to be appropriately planned and licenced if necessary, in accordance with the mitigation hierarchy.

This report also aims to satisfy the requirements of the National Planning Policy Framework (MHCLG, 2019) and opportunities for incorporating biodiversity enhancements into the proposals are outlined. It has been produced with reference to both Guidelines for Preliminary Ecological Appraisal (CIEEM, 2017) and BSI Biodiversity, Code of practice for planning and development (BSI, 2013).

2.2 Objectives

The objectives of the survey are:

- to undertake a Preliminary Ecological Appraisal (PEA);
- to undertake a scoping for protected or biodiversity species including bats in the form of a comprehensive Preliminary Bat Roost Assessment (PBRA);
- to recommend follow-on species surveys if identified as being needed;
- to make recommendations to mitigate potential negative impacts arising from development proposals; and
- to make recommendations to enhance on-site habitats and wildlife opportunities resulting in an overall biodiversity net gain.

2.3 Site Location

The application Site is an area of approximately 1.2 hectare. It lies within the urban centre of Welwyn Garden City within 300 m of the major commercial centre. To the immediate west were railway lines and sidings; to the south a large allotment (Longcroft Allotment Association's Broadwater Allotments) and residential houses; to the east by residential apartments; and to the north, a distribution warehouse and a large mixed-use development site.

There were few significant open spaces close-by, although Sherradspark Wood LNR lies 1 km to the north-west and the River Mimram 2 km to the north. Stanborough Lakes lies 1.7 km to the south-west.

3 EVALUATION CRITERIA

3.1 Baseline Ecological Conditions

The ecological baseline was established through a desk study and site survey. A preliminary evaluation against a hierarchy of protection (see 3.2 and 3.3) ranging from the highest level (internationally protected) to no statutory protection but which receive consideration under planning legislation is included in this report.

3.2 Legislation

3.2.1 European Protected Species (bats, Great Crested Newts, Otters, Dormice and others)

The information below is intended only as guidance to the legislation relating to these species. The Acts themselves should be referred to for the correct legal wording:

European Protected Species are protected under the EC Council Directive on the Conservation of Natural Habitats and Wild Fauna and Flora (the Habitats and Species Directive). This legislation is enacted under the Conservation of Habitats & Species Regulations 2017 (the 2017 Regulations). Works which involve impacts on EPS are likely to require a Natural England licence.

- > In England, Scotland and Wales all bat species are also protected under the Wildlife and Countryside Act (WCA) 1981 (as amended) through inclusion in Schedule 5. The offences under this Act, which cover the obstruction of places used for shelter or protection, disturbance and sale still apply to European Protected Species.
- > In England and Wales, the WCA is amended by the Countryside Rights of Way Act 2000 (CRoW), which adds an extra offence ('or recklessly') to S9(4)(a) and (b)), makes species offences arrestable, increases the time limits for some prosecutions and increases penalties.

Broadly it is an offence to:

- > Intentionally or recklessly/deliberately injure, take or kill a bat (or other EPS).
- > To possess a bat (unless obtained legally) alive or dead.
- > Intentionally or recklessly/deliberately damage, destroy or obstruct access to any place that bats (or other EPS) use for shelter or protection, whether bats are present or not.
- > Intentionally or recklessly/deliberately disturb a bat (or other EPS) while it is occupying a structure or place that it uses for shelter or protection.
- > Deliberately disturb bats (or other EPS) in such a way as to be likely to affect significantly:
 - (i) the ability of any significant group to survive, breed, or rear or nurture their young
 - (ii) the local distribution or abundance of that species.

Prosecution could result in imprisonment, fines of £5,000 per animal affected and confiscation of vehicles and equipment used.

A European Protected Species Licence is required before the commencement of any development that might impact on bats and their roosts, or other EPS.

Exemptions can be granted from the protection afforded to bats under the Habitat Regulations, by means of an EPS (European Protected Species) Habitats Regulations licence obtained from Natural England (NE). An EPS licence could be required for (relevant examples):

- > Demolition of a building known to be used by bats prior to the development of a site.
- > When removing trees in which bats roost, as well as tree pruning.
- > When undertaking significant alterations to roof voids used by bats.

There are three tests which must be satisfied before a licence can be issued to permit otherwise prohibited acts, in this case only Regulation 53(2)(e) is relevant, namely, for the purpose of preserving public health or safety, or other imperative reasons of overriding public interest. This includes those of a social or economic nature and with beneficial consequences of primary importance to the environment.

This is subject to Natural England's satisfaction that the application additionally meets:

- > Regulation 53(9)(a) that there is no satisfactory alternative.
- > Regulation 53(3)(b) that the action authorised will not be detrimental to the maintenance of the species concerned at favourable conservation status in their natural range.

As a result of a High Court ruling local authorities must consider all applications where European Protected Species are likely to be affected and a European Protected Species licence required, by considering the 3 tests applicable to the Habitats Directive. The ruling stated the following:

"When dealing with cases where a European Protected Species may be affected, a planning authority... has a statutory duty under Regulation 3(4) to have regard to the requirements of the Habitats Directive in the exercises of its functions. Further the Directive's provisions are clearly relevant in reaching planning decisions, and these should be made in a manner which takes them fully into account ...".

3.2.2 Wildlife & Countryside Act Protected Species (Water Voles, Barn Owls, reptiles etc)

A number of species receive protection at a national level, usually against injury and killing, but may also include destruction of a resting place, collection and sale (the latter may also apply to selected named plants). The more common species of reptile have partial protection and are also Species of Principal Importance (SPI).

3.2.3 Other Species Legislation

Certain species are protected under other legislation eg the Protection of Badgers Act 1992 which gives special protection against harm to Badgers or their setts.

3.2.4 Biodiversity Species and Habitats

A number of species and habitats which do not merit national protection are nevertheless threatened or endangered at a more localised scale, usually at a county level, or have been discovered to have undergone a rapid decline. These are listed on the UK Species/Habitats of Principal Importance (S41) list (see under 'The England Biodiversity List' in section 2.3), or county (Local) Biodiversity Action Plans (BAPs) and would be considered to be part of the National Planning Policy Framework lower tier.

3.2.5 Birds - General

All nesting birds are protected under Section 1(1)(b) of the Wildlife and Countryside Act (1981) (*ibid*). It is an offence to:

... intentionally take, damage or destroy the nest of any wild bird while that nest is in use or being built; or take or destroy an egg of any wild bird.

As a consequence no scrub or tree clearance or management should be undertaken during the nesting season, unless works to make the habitats unsuitable are first undertaken, or a detailed examination before clearance starts declares the area free. The nesting season is generally taken to be between mid-March and August if second broods are present, but warm seasons may extend this period to between February and September.

3.3 Planning

3.3.1 General

Government Circular 06/2005 (ODPM 2005) was produced as guidance to PPS9 but remains valid in relation to the NPPF. Paragraph 98 states that.....

'The presence of a protected species is a material consideration when a planning authority is considering a development proposal that, if carried out, would be likely to result in harm to the species or its habitat. Local authorities should consult Natural England before granting planning permission. They should consider attaching appropriate planning conditions or entering into planning obligations under which the developer would take steps to secure the long-term protection of the species.'

The National Planning Policy Framework (NPPF) (MHCLG 2019) sets out the Government's planning policies for England and how these are expected to be applied. The NPPF says that:

Planning policies and decisions should (paragraph 118):

- encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains – such as developments that would enable new habitat creation or improve public access to the countryside;.
- recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production;
- give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land.

Paragraph 175 of the NPPF says:

'When determining planning applications, local planning authorities should apply the following principles:

- *if significant harm to biodiversity resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;*
- *development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists; and*
- *development whose primary objective is to conserve or enhance biodiversity should be supported; while opportunities to incorporate biodiversity*

improvements in and around developments should be encouraged, especially where this can secure measurable net gains for biodiversity.'

The Natural Environment and Rural Communities Act (OPSI 2006) (section 40(1)) states that:

'Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity.'

3.3.2 Species/Habitats of Principal Importance and Biodiversity

To aid assessment and evaluation of impacts on biodiversity, a list of Species and Habitats of Principal Importance (SPI & HPI) has been produced. Natural England has produced standing advice (*Purpose and use of the England Biodiversity List*) regarding SPI as follows:

The England Biodiversity List has been developed to meet the requirements of Section 41 of the Natural Environment and Rural Communities Act (2006). This legislation requires the Secretary of State to publish a list of species of flora and fauna and habitats considered to be of principal importance for the purpose of conserving biodiversity. The S41 list will be used to guide decision-makers such as public bodies, including local and regional authorities, in implementing their duty under section 40 of the Natural Environment and Rural Communities Act 2006 "to have regard" to the conservation of biodiversity in England, when carrying out their normal functions.

3.4 Ecological Evaluation

It is important to put records and results into context using criteria such as designation, rarity, vulnerability, threat, location in a linkage of sites or features, importance at a given scale. Evaluation criteria based on those developed by the Chartered Institute of Ecology and Environmental Management are given below:

Table 3.1 Ecological Valuation Levels

Level of Value	Comment
International	Sites, habitats or species protected under international legislation eg. The Habitats and Species Directive. These include, amongst others: Special Areas of Conservation (SACs), Special Protection Areas (SPAs), Ramsar Sites, Biosphere Reserves, plus undesignated sites supporting populations of internationally important species.
National	Sites, habitats or species protected under national legislation e.g. Wildlife & Countryside Act 1981 and amendments. Sites include Sites of Special Scientific Interest (SSSI), National Nature Reserves (NNRs), Marine Reserves, plus areas supporting significant areas of UK Habitats of Principal Importance, or breeding populations of rare (Red Data Book) species.
Regional	Habitats or species meeting the criteria for regional importance e.g. regionally important assemblages of invertebrates.
County	Sites, habitats or species meeting the criteria for Local (County, Metropolitan or Unitary Authority area) designation e.g. Local Wildlife Site. This category includes designated Local Nature Reserves, which have statutory protection. Sites containing viable areas or populations of Species of Principal Importance (SPIs) or County Biodiversity Action Plan habitats or species, local Red Data Book species etc.
Local or Parish	Undesignated sites or features, which enhance or enrich the wildlife resource at a Parish or neighbourhood level.
Zone of influence	Includes nil or low ecological value but which form a function within the site or immediate surroundings.

4 METHODS

4.1 Desk Study

A desk study was undertaken to gather existing ecological records in relation to the site and the surrounding area, in order to provide ecological context for the site and to inform an assessment of the potential ecological constraints to development.

The Site is covered by the Hertfordshire Environmental Records Centre, who were consulted for records of protected and notable species along with relevant habitats, protected sites and nature reserves within 2 km of the proposed development.

4.2 Habitat Survey

4.2.1 Methodology

A Phase 1 habitat survey of the site was conducted. The survey followed the 'Preliminary Ecological Appraisal' methodology as set out in the 'Guidelines for Preliminary Ecological Appraisal' (Chartered Institute of Ecology and Environmental Management [CIEEM], 2012), which is a development of the method described in the 'Handbook for Phase 1 Habitat Survey – a technique for environmental audit' (Joint Nature Conservation Committee, 2010). In addition notes were made of dominant or uncommon species; observations of unusual flora or faunal activity were noted also.

4.2.2 Surveyor Details

The survey was undertaken by Andrew Palmer, an experienced ecological surveyor and bat worker on 17 August 2020.

4.3 Scoping for Protected & Biodiversity Species

The Site was inspected for evidence of and its potential to support protected or notable species, especially those listed under The Conservation of Habitats and Species Regulations 2017, the Wildlife & Countryside Act 1981 (as amended), including those given extra protection under the Natural Environment and Rural Communities (NERC) Act 2006 and Countryside & Rights of Way (CROW) Act 2000, and listed on the UK and local Biodiversity Action Plans. Such species include but not limited to, amphibians, Badgers, bats, birds, invertebrates, reptiles and plants.

The Site was also searched for evidence of invasive plant species, such as Japanese Knotweed (*Reynoutria japonica*) and Himalayan Balsam (*Impatiens glandulifera*) and also for evidence of use by invasive animals.

4.4 Preliminary Bat Roost Assessment

4.4.1 General

Buildings and trees were evaluated for their bat roost potential according to standard survey guidelines outlined in the BCT Good Practice Guidelines (Collins 2016), as shown in Table 4.1. The purpose of thorough examinations is to provide a basis for recommendations for further bat emergence and re-entry and characterisation surveys if required; evaluate the likely ecological impacts of potential works on roosts and habitat utilisation; and recommend mitigation or compensation measures that may be required, as well as habitat enhancements.

The PBRA survey was undertaken during daylight hours in ideal survey conditions on 17 August 2020.

Table 4.1: Assessment of Bat Roosting Potential in Buildings and Trees (adapted Collins, 2016).

Suitability	Assessment of Features Present That Potentially Support Roosting Bats
Negligible	Negligible habitat features on site and unlikely to be used by roosting bats.
Low	A small number of potential roosting sites present, with features most likely to be used by a <i>low number</i> of bats on a <i>transient basis</i> (i.e. not regularly, nor for breeding or hibernation roosts).
Moderate	Several potential roosting sites present, with features that are <i>unlikely</i> to support maternity or hibernation roosts.
High	Potential roosting sites, with features conducive to the establishment of roosts of high conservation value, e.g. larger number of bats, regular roosting, occupancy for longer periods, maternity and or hibernation roosts.

Potential for both 'higher conservation value roosts' (those used during maternity and hibernation periods) and 'lower conservation value roosts' (e.g. transient, feeding, mating, pre- and post-maternity roosts) was considered. Despite the terminology, lower conservation value roosts are still an essential component of bat population ecology, although they generally require lower standards of mitigation and compensation when being impacted.

The survey undertaken was thorough, systematic and consistent with an approach recommended to Natural England Roost Visitors. Aside from maternity and other regularly-used roosts, where larger numbers of droppings accumulate, it is often the case that there is no visible indication of their presence. Evidence is also open to nuanced interpretation.

The value of a roost varies enormously based upon the ecology of the species concerned. Very insignificant and easily overlooked features can hold maternity colonies of less gregarious species or contain several hibernating bats. These types of features could easily be attributed to the low-value category, while undoubtedly having greater significance than can adequately be evaluated through the casual survey protocols. As a result, any assessment of potential must be determined by experience and judgement and cannot be wholly formulaic.

4.4.2 Building Inspections

An inspection of all built-structures was conducted externally, and where relevant, internally, checking for bats and evidence of bats.

Internal spaces were checked for:

- bats and evidence of bats, e.g. live or dead bats, audible squeaking, droppings on the floor, walls, furniture and in cobwebs, urine marks on hard surfaces, feeding signs, etc.); and
- suitability for roosting, including potential roost locations, access points, light levels, draughts, etc.

External inspections also searched for:

- bats and evidence of bats, e.g. live bats in crevices, droppings and urine marks on walls and windows, etc.; and
- suitability for roosting including potential access into the fabric of the building particularly at eaves, soffits, under flashing and roof and ridge tiles, etc.

The survey undertaken was thorough, systematic and consistent with an approach recommended to Natural England Roost Visitors.

4.4.3 Tree Roost Inspections

All trees on Site were inspected from ground level using binoculars and a powerful spot-light. Concerning potential for roosting bats, attention was paid to the nature of holes and other cavity and crevice features and broadly referred to features described in the 'Bat Tree Habitat Key (3rd Edn.)', (Andrews 2016).

The following potential roost features (PRFs) may indicate the presence of a bat roost in a tree:

- Woodpecker and rot holes; knot holes arising from naturally shed branches, or branches previously pruned back to the branch collar or cavities created by branches tearing out from parent stems; splits and cracks such as hazard beams and frost-cracks in stems or branches; partially detached platey bark; partially detached ivy with stem diameters above 50mm; and bat, bird or dormouse boxes.

Detecting bats within trees during daylight surveys can be challenging, but occasionally the presence of bats can be indicated by signs such as:

- Droppings; luxuriant plant growth around the base of a tree that may have been fertilised by bat guano; and vocalisations.

4.4.4 Habitat Evaluation concerning Foraging and Commuting Bats

A broad assessment of surrounding habitats for its suitability in supporting bat foraging and commuting activity was undertaken regarding the BCT Guidelines (summarised in Table 4.2).

Table 4.2: Assessment of Bat Activity Suitability (Commuting and Foraging) in Surrounding Habitat
- adapted from Collins (2016).

Suitability	Commuting and Foraging Habitats
Negligible	Negligible habitat features on site likely to be used by commuting or foraging bats.
Low	Habitat that could be used by small numbers of bats such as a 'gappy' hedgerow, small patch of scrub or isolated tree.
Moderate	Continuous habitat connected to the wider countryside such as tree-lines or linked back gardens, scrub and grassland.
High	Continuous, high-quality habitat well connected to the wider landscape such as woodland, tree-lined watercourses, grazed parkland, river valleys, woodland edge.

4.4.5 Surveyor Details

The PBRA was undertaken by Andrew Palmer, an experienced bat worker holding a Level 2 Bat Survey Licence since 2011 (Class Licence Registration Number: 2015-12285-CLS-CLS). He also holds a licence to train Volunteer Bat Roost Visitors and has therefore been entrusted to teach bat surveyors how to assess roosts on behalf of Natural England.

4.4.6 Survey Limitations

There were no limitations experienced during the surveys and no significant departure from survey guidelines.

4.5 Invasive Non-native Species

The site was searched for evidence of invasive plant species, such as Japanese Knotweed (*Reynoutria japonica*), Himalayan Balsam (*Impatiens glandulifera*), Giant Hogweed (*Heracleum mantegazzianum*) as well as invasive animals such as Reeve's Muntjac *Muntjac reevesi*.

5 RESULTS

5.1 Desk Study

5.1.1 Sites

The proposed development site itself is not covered by any statutory or non-statutory nature conservation designations.

There are two statutory sites within 2 km of the Site:

- Sherrardspark Wood -1.1 km from the Site. A Site of Special Scientific Interest (SSSI) and Local Nature Reserve (LNR). The acid soils support an extensive ancient semi-natural Sessile Oak/Hornbeam *Quercus petraea*/*Carpinus betulus* woodland. A significant part of this wood is dominated by mature Sessile Oak high forest, a habitat now rare throughout lowland England.
- The Commons (LNR) - 2 km away. A mosaic of habitats including the Blackfan valley fen, broadleaved woodland, marsh (LNR).

Two Ancient Woodland Inventory Site fall within 2 km. Sherrardspark Woods - Ancient Semi-natural Woodland (ASNW) 1.1 km and Plantation on Ancient Woodland Site (PAWS) 1.2 km away.

One Herts and Middlesex Wildlife Trust Nature Reserves lies within 2 km - Lemsford Springs 1.7 km away - Old Watercress beds along the floodplain of the River Lea supporting a mosaic of wet and dry habitats, including the shallow lagoons previously used as cress beds, several watercourses, marsh and small areas of wet and dry woodland.

There are two Local Wildlife Sites (LWS) within 1 km:

Twentieth Mile Bridge Allotments lies adjacent to the Site. The site is important for protected species. Wildlife Site criteria: Species. Although the species aren't named allotments are often good for reptiles, specifically Slow-worms.

Dismantled Railway E. of Sherrardspark Wood (0.9 km away) - Designation criteria: Old/ancient woodland with a semi-natural canopy; woodland indicators.

A further twelve LWS sites lie between 1-2 km distance.

5.1.2 Protected Species Records

The Local Environmental Records Centre data search returned thousands of species records. Records of key protected species considered to be most sensitive to impact from the proposed development are itemised. Thousands of additional notable species records (Species of Principal Importance), were also returned; some of these include birds which may use the Site transiently. However, these species are unlikely to be significantly impacted by the proposed development and are not itemised. Other species for which no suitable habitat is present close to the site are not mentioned.

5.1.2.1 Internationally Protected Species Records

Amphibians: numerous records for Great Crested Newt *Triturus cristatus*, but many are old. No ponds near to the Site.

Bats:

Bat species all records (Chiroptera sp.): 244 records of ten species have been recorded within 2 km; the most recent of which was 2017. The relevance of these records is moderate as they demonstrate that a variety of bat utilise the landscape in which the Site sits, but none are particularly close.

Bat species roosts: There were five records of three species.

No European Protected Species (EPS) licences were granted in relation to bat roosts within 2 km.

The records attributed to all records of bat species are summarised in Table 5.1:

Table 5.1 Summary of Bat Species Records Within 2 Km of the Site.

Species	No. Of Records	No. of Roosts	Most Recent
Brown Long-eared <i>Plecotus auritus</i>	19	0	2016
Soprano Pipistrelle <i>Pipistrellus pygmaeus</i>	28	0	2016
Common Pipistrelle <i>Pipistrellus pipistrellus</i>	46	1	2017
Nathusius' Pipistrelle <i>Pipistrellus nathusii</i>	2	0	-
Pipistrelle species <i>Pipistrellus species</i>	44	1	2000
Noctule <i>Nyctalus noctula</i>	22	0	2016
Leisler's <i>Nyctalus leisleri</i>	10	1	2014
Natterer's <i>Myotis nattereri</i>	22	0	2017
Daubenton's <i>Myotis daubentonii</i>	48	0	2017
Serotine <i>Eptesicus serotinus</i>	8	0	2012
Barbastelle <i>Barbastella barbastellus</i>	5	1	2017
Bat species <i>Chiroptera species</i>	22	0	-
Total	276	4	

5.1.3.2 UK Protected Species

Birds - Fieldfare *Turdus pilaris*; Redwing *Turdus iliacus*; Peregrine *Falco peregrinus*; Hobby *Falco subbuteo*; Kingfisher *Alcedo atthis*; Red Kite *Milvus milvus*.

Mammals - There are numerous records of Badger from the search area only a few of which are of setts.

Reptiles - Grass Snake *Natrix natrix*, Common Lizard *Zootoca vivipara* and Slow-worm *Anguis fragilis* all recorded. Lizard and Slow-worm have been recorded from the Twentieth Mile Bridge Allotments adjacent to the Site.

5.1.4 Species/Habitats of Principal Importance and other Biodiversity Issues

Most biodiversity species recorded within 2km are birds, although a number of the protected species are also listed on biodiversity indices. They are not repeated here.

Mammals: a number of Hedgehog *Erinaceus europaeus* records including from Welwyn Garden City.

5.1.5 Invasive Non-native Species (INNS) listed on Schedule 9 of the WCA

Japanese Knotweed *Reynoutria japonica*; Giant Hogweed *Heracleum mantegazzianum*. Eastern Grey Squirrel *Sciurus carolinensis*; Egyptian Goose *Alopochen aegyptiacus*; Reeve's Muntjac *Muntiacus reevesi*; Ring-necked Parakeet *Psittacula krameri*; Signal Crayfish *Pacifastacus leniusculus*; Alpine Newt *Ichthyosaura alpestris*.

The absence of records does not mean that a particular species or habitat is not present, but may reflect a lack of recording effort in a given location.

5.2 **Habitat Survey**

5.2.1 General

As the Site held limited habitat diversity, a standard Phase 1 plan has not been produced. Instead, a simple Survey Plan is illustrated in the Appendix and accompanied by representative photographs of the Site.

5.2.2 The Site

The Site is an area of approximately 1.2 hectare. It lies within the urban centre of Welwyn Garden City within 300 m of the major commercial centre. To the immediate west were railway lines and sidings; to the south a large allotment (Longcroft Allotment Association's Broadwater Allotments¹) and residential houses; to the east by residential apartments; and to the north, a distribution warehouse and a large mixed-use development site.

The Site was dominated by tall buildings and hard paved areas for vehicles. Formal landscape planting was sparse and occupied beds no larger than 50 m². Few trees occupy the Site; an early-mature hybrid Poplar being the only significant tree away from the southern boundary. Along the southern boundary was a wedge of mostly ornamental trees with self-sown Sycamore *Acer pseudoplatanus*. The entrance road and car parking rectangle projecting south were bounded by overhanging trees growing within adjacent land. Elsewhere there were small patches of overgrown grass (mostly slivers along fence-lines). Ruderal weeds and self-sown trees and shrubs establishing in gravel areas and in paving joints were the only other vegetation present.

A brief description of the plant communities that were present is as follows:

Tree and shrub species included Ash *Fraxinus excelsior*, False Acacia *Robinia pseudoacacia*, Hawthorn *Crataegus monogyna*, Indian Bean Tree *Catalpa bignonioides*, Sycamore *Acer pseudoplatanus* and Tuliptree *Liriodendron tulipifera* with Bramble *Rubus fruticosus* agg., and Ebbing's Silverberry *Elaeagnus × ebbingei* beneath. Small numbers of non-native conifers were also present.

Ornamental Shrubs – These were variously composed of a range of mostly evergreens including Broom *Cytisus scoparius*, evergreen Spindles *Euonymus* sp., Hebes, Shrubby Honeysuckle *Lonicera nitida*, Ivy *Hedera helix*, Mulberry *Morus* sp., and a Pencil Cedar *Juniperus virginiana*.

¹ This is believed to be the Twentieth Mile Bridge Allotments Local Wildlife Site.

Neglected grass strips – These included amenity grass dominated by Perennial Rye-grass *Lolium perenne* with patches of forbs including Canadian Fleabane *Erigeron canadensis*, Daisy *Bellis perennis*, Ribwort Plantain *Plantago lanceolata* and Yarrow *Achillea millefolium*. Wall Barley *Hordeum murinum* was also present.

Ruderal species growing in and edging paved areas included: Annual Sow-thistle *Sonchus oleraceus*, Bristly Oxtongue *Helminthotheca echinoides*, Herb Robert *Geranium robertianum*, Prickly Lettuce *Lactuca serriola* and Prickly Sow-thistle *Sonchus asper*. Both Hybrid-poplar and False Acacia were establishing as self-sown trees within gravel areas.

5.2.2 Adjacent Habitats

The most significant adjacent habitat were the 0.6 ha allotments to the south. These were well-managed with a high diversity of vegetable and fruit crops and surrounded by small (mostly-native) trees.

5.3 Scoping for Protected and Biodiversity Species

- The presence of buildings indicates the potential for bats and a survey has been conducted.
- Nesting birds: Some suitability for common urban species.
- Invasive species: Suitable habitat.

The following have been scoped out:-

Table 5.1 Species Scoped Out and Reasons

Species/ Feature	Reasons for Scoping Out
Great Crested Newt	No open water bodies near the Site.
Dormice	No suitable habitat present.
Water Vole, Otter	No suitable habitat present.
Badgers	Badgers are likely to be present in the area but not in the immediate area due to its highly urbanised nature.
Reptiles	Adjacent allotments are noted for Common Lizard and Slow-worm. However the high level of hard-standing on the Site and only narrow slivers of semi-natural habitat meant that it is unlikely that they would colonise the Site.
Hedgehog	As with reptiles, they may be present on adjacent land but the Site is unsuitable for them.

5.4 Bat Survey (Preliminary Bat Roost Assessment)

5.4.1 General

The location of the buildings surveyed is shown on figure 1434/1/1 in the Appendix. with photographs for the buildings and ancillary structures.

5.4.2 Building Inspections

Description: Various flat roof construction in brick, glass and steel claddings

Proposed development: Demolition

Evidence Found: None. Cladding in undercrofts, overhangs and at roof/wall junctions was checked by viewing from each floor and from the roof. Exterior surfaces were free of bat evidence. No evidence in underground car parks or in plant rooms (at ground level or at roof level).

Roost Suitability: Negligible, lacking suitable crevice and void spaces.

The potential impact of proposed development: Negligible.

Further surveys required: No.

5.4.3 Tree Roost Potential

None of the mature trees on Site held bat roost potential and were therefore categorised as of Negligible suitability.

5.5 **Invasive Non-Native Species**

No evidence of invasive non-native species (INNS) was found.

6 **DISCUSSION & ANALYSIS OF RESULTS**

6.1 **Discussion**

6.1.1 General

The Site held comparatively limited value for wildlife and provided no evidence or potential for protected and notable species. Therefore, no further ecological surveys are required to establish potential impacts on biodiversity.

The redevelopment of the Site will not impact statutory or non-statutory wildlife sites. None of the habitats or protected species records returns for the surrounding 2 km radius are of high significance to the development proposals.

On the face of it, none of the protected or notable species records indicate that the species involved will suffer detrimental effects from the development, as none rely upon the Site where their population ecology may be impacted. Nevertheless, the allotments hold a significant population of Slow-worm (and is a Local Wildlife Site). An allotment holder suggested that domestic cats were a problem within the allotments. Inevitably increasing residential areas will lead to an increase in cats resulting in an increased predation of small mammals; there is little that can be done to mitigate cat predation. However, as most of the proposed development is proposed as apartments and flats, cat numbers may not increase.

6.1.2 Bats on Site

No evidence of bat roost utilisation of buildings or trees was found. Furthermore, none of the buildings or trees was considered to hold roost suitability and therefore do not require further investigation. Enhancement opportunities should be sought to improve roosting opportunities for bats.

Despite the lack of evidence of roosting bats, the Site lies within the surrounding landscape context that supports typical urban bat populations and the mature trees and hedgerows along the southern boundaries are likely to provide features conducive to foraging and commuting. The development should seek to maintain and enhance provision for foraging bats.

6.1.3 Other Protected and Notable Species on Site

The habitats present provide limited suitability for protected species and there is no evidence of their presence. Potential impacts arising that would affect these species are negligible.

Nesting birds may use the Site. Therefore, measures to ensure that they are not harmed during construction are required. Additionally, features that ensure they can continue to utilise vegetated habitats, once development is complete, should be incorporated.

6.2 Evaluation

Table 6.1 Ecological Valuation for this Site

Level of Value	Comment
International	None.
National	None.
County	None.
Regional	None.
Local	None.
Zone of Influence	Limited to boundary vegetation along the southern edge.

Using the above criteria, the current information values the Site as a whole at Zone of Influence level as it has negligible biodiversity features.

7 RECOMMENDATIONS

7.1 Further Surveys and Licensing

No further surveys are required.

7.2 Mitigation

7.2.1 General Principles

When designing a scheme the Mitigation Hierarchy should be applied to limit potential impacts on biodiversity. The mitigation hierarchy is:

1. Avoidance - Measures taken such as design changes, to avoid creating impacts from the start. For example, changing the location of the development or development activities within the site to avoid sensitive habitats or species present on site.
2. Minimisation - Measures taken to reduce the duration, intensity, extent and/or likelihood of impacts that cannot be avoided, to a level that is no longer considered significant for the species or habitat feature.

3. On-site compensation - Measures taken on-site, to provide a biodiversity contribution that is proportionate to the long term loss for residual impacts that cannot be completely avoided or minimised.
4. Off-site compensation / offset - Measures taken off-site to provide a biodiversity contribution that is proportionate to the long term loss for any residual, adverse impacts onsite after full implementation of the previous three measures.

7.2.2 The Site

7.2.2.1 *General*

There are no obvious impediments to proceeding with the development with respect to potential impacts on ecology and local ecosystems. However, the development should be planned and implemented both to reduce the likelihood of wider-ranging impacts, such as from artificial illumination on nocturnal species. Additionally, proposals should result in a net gain in biodiversity in line with national and local planning policy.

7.2.2.2 *New Lighting*

To ensure detrimental lighting impacts on bats using the Site are avoided, there should be limited increased light spillage on to the surrounding boundary habitats and any roost spaces provided. Lighting should be restricted to the lowest level of illumination required for safety and security and only where needed. The following measures should be implemented within the lighting scheme:

- New column-mounted luminaires, lighting bollards and wall-mounted luminaires should be selected, sited and angled such that they do not spill unnecessary light on to areas where illumination is not required so that there is no significant increased light trespass on to existing nocturnally dark habitats where bats forage and commute.
- Ensure new LED luminaires have dimming capability, a warm white spectrum (ideally less than 2700, but below 3500 Kelvin) with peak wavelengths higher than 550 nm and with no UV output.
- Where security lamps are used these should use a trigger to illuminate them (e.g. passive infra-red detector) and switch off after a short period (ideally 1 minute), rather than remaining on all night and generally lights should be switched off when not required;

Further guidance is available in Bats and artificial lighting in the UK (ILP 2018). Wherever possible guidance should be provided to new residents to ensure that they understand the reasons for protecting on-site ecology and carefully consider post-completion lighting additions.

7.2.2.3 *Removal of Vegetation*

Whilst little vegetation of value will be lost as a result of the proposed development, removal should be preceded by careful checks for wildlife, in particular nesting birds and Hedgehogs. If vegetation removal occurs during the bird nesting season (March-August inclusive) prior observation and incremental removal will allow avoidance of harm to any species present. However, if nesting birds are discovered or obviously present then works must be suspended until after the young birds have fledged. If in doubt, the advice of an ecologist should be sought.

7.3 Enhancements

7.3.1 General Principles

In accordance with the National Planning Policy Framework, which seeks to ensure that all new development includes biodiversity enhancements, the following provision is recommended. Careful consideration has been given to the features that are effective and supported by strong conservation evidence, i.e. they are known to benefit the target species. Further consideration has been given to the likelihood of enduring management, and only features that will maintain their long-term effectiveness have been included.

7.3.2 Biodiversity Gain Through New Landscape Planting

The proposed development includes extensive areas of landscape planting provision which affords excellent opportunities for increasing foraging, nesting and connectivity for wildlife. A combination of native and ornamental flower and berry-rich species will attract to wildlife and, in particular, provide a resource for pollinating invertebrates.

Native planting will be sourced from local, or UK provenance and flowering species should be those known to be utilised by pollinators. The Royal Horticultural Society's 'Perfect for Pollinators' list provides examples of suitable native and ornament species. Plants specifically used to attract pollinating insects will be sourced from organic suppliers where practical (as many commercial outlets use pesticides such as neonicotinoids which are persistent and can remain harmful to invertebrates).

7.3.3 Bat Roosting Opportunities

Bat roosting boxes will be integrated into built-structures to benefit from the thermal mass of the structure. Across the proposed residential units proposed, no fewer than ten wall integrated bat boxes will be installed. These will be installed high on the gable or near eaves away from bedroom walls and security lighting and face boundary hedgerows/open spaces. Externally fitted boxes (on trees or houses) are not ideal and will not be used as they do not provide an adequate long-term solution.

7.3.4 Bird Boxes

In response to national declines in the Swift *Apus apus* population, provision for Swift nesting will be included. Twenty integrated nest boxes will be provided such as the Schwegler lightweight Swift Box Type 1 A or similar. As Swifts prefer to nest in colonies, boxes should be grouped (see www.swift-conservation.org). Swift boxes will be located in sheltered spots away from artificial lighting and placed high on the building. They should be sited to avoid potential conflict with residents and away from balconies. Boxes should be installed in order that they receive some shade during the day to give protection from excessive summer heat. They should be sited at least 5 metres above ground, with clear adjacent airspace so the Swifts can access them in high-speed direct flight. Unlike many types of bird box, they will not require maintenance.

7.3.5 On-site Interpretation

Where ecological enhancements are made, it may be beneficial to include on-site interpretation to encourage residents to value the habitats created. This may take the form of signage, leaflets or new residents packs. Enthusiastic residents may contribute to on-going conservation development (such as playing swift recordings to encourage nest uptake), and this is to be promoted.

8 CONCLUSIONS

There are no significant ecological constraints to the redevelopment of the Site. The potential impacts on existing wildlife are likely to be minimal. Redevelopment offers scope for increasing biodiversity and providing opportunities for roosting bats and nesting birds that are currently lacking, along with other landscape provision such as wildlife-friendly planting to encourage greater biodiversity than is present.

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APPENDIX

1434/1/1 Site Plan

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Figure 1434/1/1 Simplified plan showing survey area (bounded by the red line), building locations (shaded black) and vegetated areas (green), Non-shaded areas are paved – based upon Plowman Craven Survey 2019. Key – G Grass, OS Ornamental Shrubs, OT Ornamental Trees



BAT SURVEY PHOTOGRAPHS



Photograph 1: Main Building -eastern elevation.



Photograph 2: Main building – western elevation.



Photograph 3: Main building – north-facing elevation on west side and roofscape



Photograph 4: Interior lightwell with gravel (left) and underground car park (right)



Photograph 5: Entrance road from ground level (left) and from the roof (right).



Photograph 6: Above ground car park from the roof (left) and north-eastern service buildings (right).



Photograph 7: Formal landscaped areas are limited to the south-west (left) and south-east (right) corners of the main building.



Photograph 8: Overgrown lawn with poplar tree and hawthorn near the entrance (left) and ruderal weeds and self-sown tree saplings establishing in gravel area service buildings (right)..



Photograph 9: Adjacent allotments with ornamental tree belt in the foreground (left) and a closeup of allotment (right).