



hghconsulting.com

45 Welbeck Street
London W1G 8DZ
020 3409 7755
info@hghconsulting.com

hghconsulting.com

National Planning Casework Unit
Ministry for Housing, Communities and Local Government
5 St Philips Place
Colmore Row
Birmingham
B3 2PW

20 November 2020

Dear Sir or Madam,

BioPark, Broadwater Road, Welwyn Garden City, AL7 3AX – Welwyn Hatfield Borough Council ref. 6/2020/2354

Request for a Screening Direction of the Secretary of State under Regulation 7 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, as amended

This letter requests that the Secretary of State adopts an Environmental Impact Assessment (EIA) Screening Direction for the proposed development (herein after called “the Project”) of the above site.

In accordance with Regulation 7 of the EIA Regulations, we enclose the following a copy of the following:

- The Screening Request made to Welwyn Hatfield Borough Council (WHBC), including annexes, dated 11th September 2020, (see Annex A);
- The request for additional information made by WHBC, dated 16th October 2020, (see Annex B);
- The additional information submitted to WHBC, dated 28th October 2020, (see Annex C), and
- The Screening Opinion adopted by WHBC, dated 18th November, (see Annex D).

Summary of the Project

The site comprises an area of 1.22ha, it is currently occupied by a complex of industrial buildings. Until 2019 the site was operating as a research and development facility, which included chemistry and biology laboratories, office accommodation and specialist and conference facilities. The site is not located within a ‘Sensitive Area’ as defined by the EIA Regulations.

The Screening Request, submitted to WHBC on 11th September 2020, (see Annex A) was based on the following Project:

**Planning, Environment &
Development
Services**

hgh Consulting is a trading style
of Hepar Grincell Limited etc.
Registered in England & Wales: 9340687
Registered address: Henwood House,
Ashford, Kent TN24 8DH



hghconsulting.com

- Demolition of all of the existing buildings and structures;
- Up to 300 residential dwellings in buildings of up to nine storeys;
- A community hub space of up to 100sqm;
- Up to 340 car park spaces (including blue badge spaces), the majority of which will be contained within a basement;
- Cycle parking will be provided in line with planning policy requirements;
- Existing access will be retained and enhanced, and
- Areas of public green space and private amenity spaces.

It should be noted that following pre application planning consultation with WHBC the proposal has decreased in scale and the level of provision, to that of 289 residential units and 189 parking spaces. However, we do not consider that this has a specific bearing on the request of for a Screening Direction given that the original Screening Request was based on the upper parameters as stated above.

Screening Background

During the Screening process we engaged with WHBC as part of ongoing pre application consultation. WHBC expressed their concern that the Project could be considered to be EIA development, and specifically mentioned cumulative development.

A Screening Request submitted was on 11th September 2020 (see Annex A). The Screening Request sought to cover all matters relating to the potential for significant environmental effects in relation to a development of this nature i.e. residential.

Following consideration of the Screening Request, WHBC considered that additional information (See Annex B) was required, specifically in relation to the operational impacts relating to transport and air quality.

Additional Information was submitted on 28th October 2020 (see Annex C), which sought to address the issues raised in relation to transport and air quality.

A meeting was held with WHBC on 13th November 2020 to discuss the Screening Request further. Whilst the meeting was held in a positive manner, it was clear that both parties did not agree in relation to keys points of:

- Net decrease in trip generation, and
- Cumulative impact, specifically in relation to transport and air quality.

Trip Generation

The Screening Opinion (see Annex D) states:



hghconsulting.com

'...there is no explanation as to what former use the TRICS data is based upon, and nor is there any consideration of the cumulative effect of the various developments coming forward in the vicinity, a number of which entail a significant increase in residential units with car parking.'

We consider that the baseline position for the site is that of the industrial use (approximately 13,827sqm of floorspace). This is the permitted planning use (Use Class B1b) for the site and until 2019 was operational. We do not believe that this can be disputed.

As such, the transport analysis (which is detailed in Annex A of Annex C) estimated, using the TRICS database, the potential trip generation of the baseline position. The site has not been in operation during 2020 therefore existing multi modal surveys have not been possible. Full details of the trip generation are set out at in paragraph 2.2.5 Annex A of Annex C.

The proposed trip generation was generated using the TRICS database, this is detailed from section 2.3.1 to 2.3.3 of Annex A of Annex C.

The transport analysis concludes the maximum parameters of the Project will result in an overall reduction in total two-way vehicle trips across the day and during peak hours.

Based on this information it is considered that the Project will result in an improvement over the baseline position and therefore not give rise to a significant transport and highways impact which will require further assessment under EIA. Furthermore, should an Environmental Statement (ES) be required a transport chapter will be based on the trip generation figures shared with WHBC and the methodology as agreed with Hertfordshire County Council (HCC).

Based on the above, it is also considered that in relation to operational development the Project will have a negligible impact on the local air quality.

Cumulative Impacts

The Screening Request (see Annex A) acknowledges that there are a number of potentially cumulative developments in the local area. However, given that it has been demonstrated that the Project will have no net increase in trip generation (indeed it will have a net decrease) when compared to the baseline, it is deemed not to lead to a significant adverse cumulative impact. Again, should an EIA be carried out, based on this information, the conclusion will be the same.

Additional Considerations

HTVIA

In the Screening Opinion (see Annex D), WHBC acknowledge that a Heritage, Townscape and Visual Impact Assessment (HTVIA) has been carried out and that it accompanied the Screening Request (see Annex A). WHBC go on to state that:

'... due to the scale of the development, namely the height, in contrast to existing development within the area, it is considered that there may be potential that the development could give rise to significant effects upon historic assets.'

Again, this point is disputed, as the HTVIA indicates that there will in fact be a beneficial impact and therefore we maintain the position that this should not require further assessment under EIA.



hghconsulting.com

Shredded Wheat Factory Development

A number of references are made to the Shredded Wheat Factory (planning ref. N6/2018/071/MAJ) within the submitted documentation. This is a permitted (and therefore cumulative) scheme for a residential led mixed use development of 1,340 homes and approximately 14,000sqm of community and community floorspace. The site is currently under development. The application was subject to EIA. It is understood that amendments are being sought to this application which will lead to an increase in the quantum of development, although they are currently at pre application stage. Given the development was subject to EIA, any subsequent application will need to update the Environmental Statement (ES), including the consideration of the cumulative impacts, and therefore our application once submitted as being reasonably foreseeable. However, we remain of the opinion that given our Project will not give rise to significant adverse impacts no additional mitigation measure will be identified.

We trust that this letter and the enclosures provide sufficient information to satisfy the request for a Screening Direction. However, please do not hesitate to contact me should you have any further queries.

Yours sincerely

Eve Campbell
Director

cc. Clare Howe, WHBC
Enc. As stated



hghconsulting.com

Annex A: Screening Request



hghconsulting.com

Annex B: Request for Additional Information



hghconsulting.com

Annex C: Additional Information



hghconsulting.com

Annex D: Screening Request