



Ms. Clare Howe
Welwyn Hatfield Borough Council
Planning Department

BY EMAIL

5th March 2021

Dear Ms. Howe,

**FORMAL OBJECTION TO PROPOSED REDEVELOPMENT
BIOPARK SITE, WELWYN GARDEN CITY – REF: 6/2020/3420/MAJ**

I write to you concerning the proposed redevelopment of the Biopark site, Broadwater Road, under the planning reference 6/2020/3420/MAJ.

I have sought to outline our concerns with this site below and which, in many cases, echo those of Historic England and Place Services. The concerns listed are also similar to those relating to the former Shredded Wheat Factory, a site with which we are highly familiar and where extensive engagement discussions have occurred with the developer; in that case Metropolitan Thames Valley.

For the purposes of consistency of approach and outcome, I would strongly encourage the developer of the Biopark site to engage with Gascoyne Estates as stewards of the Grade 1 Listed Hatfield House, Registered Park and Gardens on a similar basis. As a key local stakeholder Gascoyne remain ready and willing to engage.

We have previously delayed responding to this application in anticipation of receiving detailed documentation from the developer. To date no documentation, drawings or additional information has been received. This, despite our accommodation of a site visit as recently as 16th February 2021.

Further to this visit, I note that a Heritage, Townscape and Visual Impact Addendum has been uploaded to accompany the planning application. It is not felt that this document either adequately or accurately represents the issues at stake and for the following reasons wish to register a **formal objection** to this application.

In broad terms, our concerns relate to:

1. Height, massing and landscape impact

We contest the language used in the Addendum, which claims that the existing Biopark building is '*just perceptible*' (para. 1.4) when viewed from the roof of Hatfield House. This is simply untrue. In fact, the Biopark is framed by the woodland and forms a focal point in the distance, partly due to the linear nature of the avenue leading away from the House. This makes the Biopark buildings highly perceptible. If produced at the required scale and correctly rendered, then we have no doubt that the image would demonstrate a higher degree of harm than is being claimed.



Similarly, the view taken from the Winter Dining Room on the first floor does not highlight the fact that, to a human eye, the Biopark building is framed by mature woodland and is consequently a feature in the landscape which actually draws the eye. In both views the majority of the existing building is not screened by woodland, and given the ‘increase in the horizontal mass’ proposed, this will continue to be the case. Again, if produced according to Landscape Institute standards, this image would have a significantly different impact.

We take issue with the phrases ‘*partially visible*’ and ‘*screened by the tree line*’ (para. 1.8) which wholly misrepresent the true impact of the existing buildings on views from the House. The vast majority of the building is fully visible from both viewpoints and should be understood in these terms. Attempts to downplay the significance of the existing building on the skyline should be reconsidered.

The narrative accompanying Figure 4, taken from the South Front, similarly attempts to downplay the significance of the impact. This is a primary and historically significant view of the House. The proposals as demonstrated would add a significant mass of built development above the line of the roof, substantially reducing its symmetry and fundamentally altering the way it is perceived in the landscape.

Simply, the images reproduced in the Addendum are not of sufficient scale or clarity to make a judgement on harm. The Landscape Institute guidance relating to long distance verified views is clear in what is expected and required of an image in order for it to be meaningfully assessed. When seen as a small inset image as part of an A4 document, it is no surprise that the impact is difficult to understand. We expect that correctly scaled images will be created and provided to us for scrutiny so that a reasoned conclusion can be reached.

2. Surface treatments, design and materials

The redevelopment of the site presents an opportunity to mitigate some of the harm caused by the existing Biopark buildings. The use of appropriate surface treatments and materials will go some way to softening and breaking up the effect of the buildings in the landscape. However, and as explained to Fiona Williams of Bidwells during the site visit on the 16th of February, we expect that fully rendered views will be necessary to understand the true impact of any materials and surface treatments. Wirelines do not provide sufficient information to fully appraise the potential harm.

Additionally, whilst the existing Biopark building is indeed white, the impact of the proposed residential buildings would not be ameliorated by surface treatments alone. Light pollution from windows in new flats would be visible at extended distances, both from the roof of the House, the South Front and the Winter Dining Room. It is therefore preferable to reduce the height of the proposed residential buildings, in order to increase the amount of light pollution filtered by the woodland, or: design the buildings to minimise exposure to the House.

3. Other views

Despite photographs being taken from the Deer Park on the 16th of February, the Addendum does not include this view. This is a view of critical historic importance and is featured in a notable painting of the House. Peter Mitchell explained this point to the consultants present.



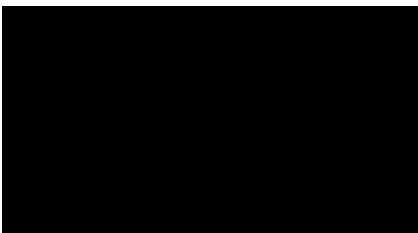
This view has been considered by the developers of the Shredded Wheat site and it is felt to be equally relevant to deliberations in respect of the Biopark site. Similarly, additional views

from the Essendon Conservation Area were also considered for the Shredded Wheat site and should be included in any judgements of the harm in the interests of consistency and thoroughness.

In summary, the evidence provided by the developer's consultants is insufficient to understand the full impact of the development on Hatfield House, Park and Garden. The language used attempts to downplay the significance of the impact and presently presents a misleading picture. The images provided do not meet the necessary criteria as set out in Landscape Institute guidance and should thus be reproduced at the correct scale for further scrutiny. Additional viewpoints will be required and rendered to achieve a full and robust appraisal of the impact, both on the listed assets and the wider landscape.

At present, Gascoyne objects in the strongest possible terms to this proposal. We take a pragmatic approach to development and fully support the regeneration of the site in principle. However, without undertaking the additional work laid out above, it is impossible to have any certainty that the proposals will not result in significant harm to the setting of Hatfield House, the scheduled Park and wider ensemble of heritage assets.

Yours sincerely,



Anthony Downs
Hatfield Estate Director
Gascoyne Estates