



Historic England

Ms Clare Howe
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The Campus
Welwyn Garden City
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Direct Dial: 01223 582716

Our ref: P01398930

1 April 2021

Dear Ms Howe

**T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**SOUTH SIDE FORMER SHREDDED WHEAT FACTORY, BROADWATER ROAD,
WELWYN GARDEN CITY, HERTFORDSHIRE
Application No. 6/2021/0671/MAJ**

Thank you for your letter of 12 March 2021 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

Summary

The wider former Shredded Wheat Factory site was granted planning permission in 2019 for a mixed use redevelopment including 1,454 dwellings. Historic England have been involved with redevelopment proposals for the North Side site, now branded the Wheat Quarter site, which is located adjacent to the Welwyn Garden City Conservation Area and close to the Peartree Conservation Area for several years.

We worked with the applicants for the North Side site with the aim of achieving a quantum and quality of development that would respect the scale, massing and detailed design of the original 1925 Shredded Wheat factory building.

In principle, we welcome proposals that would deliver high-quality redevelopment of the South Side site. MTVH gained planning permission in 2019, as part of the wider mixed use scheme, for 643 residential units in 19 blocks on the South Side site to be implemented in three phases. Phase 1 of the South Side is currently under construction.

Due to their closer proximity to the former factory building, Phases 2 and 3 of the MTVH development, now involving detailed proposals for 317 dwellings and outline proposals for up to 404 dwellings, will have more impact on the setting of the former factory. They will also affect the setting of the Welwyn Garden City Conservation Area



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and may affect the wider setting of Hatfield House, Park and Gardens.

From the outset at pre-application stage, in relation to Phases 2 and 3, we had serious concerns regarding the impact of the increase in height and scale of the overall development and in particular, of four of the 19 blocks proposed for the site - the tallest being 13 storeys - in relation to the setting of the grade II listed building, the adjacent conservation area and to Hatfield House and Gardens.

We considered a moderate level of less than substantial harm would be caused to the significance of these designated heritage assets.

Regarding the current, formally submitted proposals, we welcome the reduction in height of the tallest block in Phase 3 from 13 to 10 storeys, which has resulted in the impact of the development being reduced to a low level of less than substantial harm in views from Hatfield House.

However, we maintain our concerns regarding the overall impact of Phases 2 and 3 of the scheme, which include four blocks at 10 storeys, on the setting of the former factory and on the adjacent conservation area. We consider the impact remains at a moderate level of less than substantial harm.

Historic England Advice

The significance of the historic environment

Welwyn Garden City was the second new town to be developed in accordance with the principles laid down by Ebenezer Howard, but the vision for the town was largely provided by Louis de Soissons, who not only provided the overall masterplan but also was architect for a significant number of buildings within the town.

His masterplan envisaged 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.

The original factory building by Louis de Soissons, which dates from 1925, was inspired by Shredded Wheat's flagship factory near Niagara Falls and forms one element of the wider development site. There are two concrete ranges, at right angles with links.

The southern range consists of giant cylindrical concrete silos six bays long (following the recent demolition of nine later silos) with flat oversailing capping with right over the entre top. Behind this is a plain attic storey with 28 plain windows with plain capping over.



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On one end elevation there is a three-bay projecting tower rising just above the main roof level. Adjacent is a seven bay, four storey block with large windows divided by narrow piers and small scale structural divisions between the storeys, making it almost wholly glass.

The building was described as a model factory, enhanced by the use of white ceramic tiles that encased the building like ivory and was regarded as one of the most avant-garde buildings in Britain. It is listed at grade II in recognition of its special architectural and historic interest.

Because of the complexity of the site, a standard Register entry format for Hatfield House would convey neither an adequate description of the house nor a satisfactory account of the development of the landscape. Briefly, the early 17th century country mansion is surrounded by extensive and complex gardens and park; created from the medieval parks of Hatfield.

Robert Cecil's formal, early 17th century gardens were created with input from designers including Thomas Chaudler and Salomon de Caus, and planted by John Tradescant the elder, at that time the head gardener.

The gardens were landscaped in the 18th century, but then remodelled and extended in the 19th and 20th centuries. The importance of the site is recognised in its grade I listing; together with reference to it by English Heritage in 2014 at the New Barnfield Planning Inquiry which concluded that *'the house, its gardens and park and the Old Palace form a place of extraordinary architectural and artistic importance and are of extraordinary significance.'*

The proposals and their impact on the significance of the historic environment

This hybrid application relates to Phases 2 and 3 of the MTVH development, comprising a detailed application for Phase 2 for the erection of 317 dwellings with associated access, parking, landscaping and other supporting infrastructure; together with Phase 3 comprising an outline application for up to 404 dwellings with all matters reserved for access.

The proposed revisions to the extant 2019 permission for 643 residential units on the South Side site involve an increase in height of several of the 19 blocks, with the tallest blocks now proposed to be 10 storeys.

At 10 storeys, several of the blocks in Phases 2 and 3 proposals would challenge the dominance of the landmark historic silos of the grade II listed former factory building in views of the skyline, in medium distance views within the conservation area and where the skyline comprises the roofscape of domestic scale buildings.



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Legislation, Policy and Guidance

As the proposals affects the setting of listed buildings - primarily the former factory building in the North Side site and, in the wider setting of the site, Hatfield House and Gardens - the statutory requirement to have special regard to the desirability of preserving the setting of a listed building (s.66(1), 1990 Act) must be taken into account by the local planning authority when making its decision.

Our advice reflects guidance in the good practice advice notes produced by Historic England on behalf of the Historic Environment Forum in GPA 2; Managing Significance in Decision-Taking in the Historic Environment and GPA 3; The Setting of Heritage Assets.

The NPPF at paragraph 192 encourages local authorities to sustain and enhance the significance of heritage assets consistent with their conservation and asks that they take into account "the desirability of new development making a positive contribution to local character and distinctiveness."

It establishes that great weight should be given to an asset's conservation and the more important that asset, the greater that weight should be (paragraph 193). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

Any harm to, or loss of significance of a designated heritage asset (from its alteration or destruction, or from development within its setting) should require clear and convincing justification, (paragraph 194).

Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, that harm should be weighed against the public benefits of the proposal, including securing its optimum viable use (paragraph 196).

Setting is then defined in the Framework as 'the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset and may affect the ability to appreciate that significance or may be neutral'.

Historic England's Position

We have considered the comprehensive documentation submitted with the Phases 2 and 3 application. Having stated clearly from the outset at pre-application stage that our primary concern centred on the increased height of some of the blocks, we



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welcome the reduction in height of the tallest block in Phase 3 from 13 storeys to 10 storeys.

The development would now incur a low level of less than substantial harm in views from the wider setting of Hatfield House and Gardens.

However, we maintain our concerns in relation to the proposed overall increase in height and scale of the proposals, which would result in a significant escalation of the visual intrusion of the scheme in close proximity to the grade II listed former factory and the wider townscape including the conservation area.

The stated aims in the Broadwater Road West SPD, which underpinned the design approach for the 2019 consented scheme include 'enhancing the gateway into the site along Hyde Way, on approach from the east and the west; preserving identified key views of the retained listed buildings and respecting the setting of the original 1920s silos.'

The silos have been a dominant feature on the Welwyn skyline since their construction in 1925 and the proposals in their current form would remove that dominance.

We also remain concerned that the detailed design of the scheme does not noticeably take cues from the vernacular character of the highly influential Garden City Conservation Area, preserve identified key views of the retained listed buildings or respect the setting of the original 1920s landmark silos.

In our view, the impact the Phases 2 and 3 proposals would incur on the setting of the grade II listed Louis de Soissons former factory building and the conservation area would be at a moderate level of less than substantial harm to their significance.

Recommendation

Historic England have concerns regarding the application on heritage grounds. We consider that a moderate level of less than substantial harm to the significance of designated assets would result from the impact of the proposals on their setting.

We consider that the application does not meet the requirements of the NPPF, in particular paragraph numbers 194 and 196.

In determining this application you should bear in mind section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess and section 72(1) of the Planning





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(Listed Buildings and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.

You should also bear in mind section 38(6) of the Planning and Compulsory Purchase Act 2004 to determine planning applications in accordance with the development plan unless material considerations indicate otherwise.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.

Yours sincerely

Sheila Stones

Inspector of Historic Buildings and Areas

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