

Town & Country Planning Act 1990
Planning (Listed Building and Conservation Areas) Act 1990

Appeal by

HG Group

BROADWATER GARDENS,

BIOPARK,

BROADWATER ROAD,

WELWYN GARDEN CITY,

AL7 3AX

Council Reference: 6/2020/3420/MAJ

PROOF OF EVIDENCE

OF

STEPHEN LEVRANT

RELATING TO TOWNSCAPE AND

BUILT HERITAGE MATTERS

June 2022



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1. INTRODUCTION AND SUMMARY

- 1.1.1. I, Stephen Levrant, understand the rules in “The Town and Country Planning (Inquiries Procedure) (England), Rules 2000 (Statutory Instrument 2000/1624) and I comply with them.
- 1.1.2. I believe that the facts stated in this report are true and that the opinions expressed are correct.
- 1.1.3. My main Proof of Evidence (‘PoE’) treats the aspect of the third Reason for Refusal (‘RfR 3’) identified in the Decision Notice to refuse planning permission for the scheme at location BioPark, Broadwater Road, Welwyn Garden City AL7 3AX, planning reference: 6/2020/3420/MAJ (the ‘Appeal Scheme’).
- 1.1.4. RfR 3 states that; *‘The proposal by reason of its form, height, bulk, scale and massing does not achieve high quality design. **The proposed Development also does not respect or relate to the character and context of the local area and fails to maintain, enhance or improve the character of the existing area. As such, the application is contrary to Policies D1 and D2 of the District Plan and the Broadwater Road West SPD, Paragraphs 130 and 134 of the NPPF and Policy SP 9 of the emerging local plan.**’* Planning permission was refused for the Appeal Scheme on 16th September 2021. The first part of this RfR (normal italic text) is referred to in this PoE as RfR3a, and the section that is bolded is referred to as RfR3b.
- 1.1.5. The first and second RfRs concern housing tenure and transport matters and will be addressed in the Statement of Common Ground (‘SoCG’) and Statement of Case (‘SoC’) and statements by other witnesses. RfR 3 shall be addressed by this PoE and the PoE of Simon Camp of Alan Camp Architects.
- 1.1.6. The information contained herein should be read with the other documents that support the appeal case, including the documents submitted with the planning application and the planning evidence presented by HGH Consulting Planning Consultants.
- 1.1.7. A Design and Access Statement (‘DAS’) by Alan Camp Architects, a Heritage and Townscape Visual Impact Assessment (‘Bidwells HTVIA’) and an Addendum HTVIA (the ‘Addendum’) by Bidwell’s were provided as part of the application documentation. A Planning Committee Report (‘PCR’) was issued by the Council officers dated 31st August 2021. The DAS, the Bidwells HTVIA, the Addendum and the PCR will be referred to in this PoE.

1.1.8. The proposal comprises: *Demolition of existing buildings and construction of 289 residential units (use class c3) and community hub (use class e/f.2), with public realm and open space, landscaping, access, associated car and cycle parking, refuse and recycling storage and supporting infrastructure.*

2. DETAILS OF WITNESS APPOINTMENT

2.1.1. I was appointed by HGH Group on 14th October 2021 and my initial instruction was to provide an independent Heritage and Townscape Visual Impact Assessment ('HTVIA') of the Appeal Scheme. This was submitted as part of the appeal documentation and is referred to in documentation as the 'SLHA HTVIA' (Appendix 6 of CD – F1). I had no prior involvement with the Appeal Scheme.

2.1.2. My appointment also included preparation of a PoE relating to Heritage and Townscape Matters and contribution to Appellant's Statement of Case and to the Statement of Common Ground agreed with the Council.

3. QUALIFICATIONS AND EXPERIENCE OF WITNESS

- 3.1.1. I am a chartered architect and principal of Heritage Architecture Ltd, a practice specialising in matters concerned with the historical and cultural environment. I have obtained wide experience in all matters relating to built heritage and townscape, with over 40 years of experience.
- 3.1.2. I attained membership to the Royal Institute of British Architects in 1977, having graduated from the Architectural Association School of Architecture in 1975. I attained a further Diploma in Conservation from the Architectural Association in 1979 and have been a member of the Institute of Historic Building Conservation since its inception, having previously been one of the relatively few private practice members of the Association of Conservation Officers, which preceded it. I have been elected a Fellow of the Royal Society of Arts, and of the Association for Studies in the Conservation of Historic Buildings and served on the latter committee for many years.
- 3.1.3. I was elected to Design:SE, the South East design review panel in 2019.
- 3.1.4. I have spent my professional career working on the conservation and regeneration of the built environment, in both the public and private sectors of the profession.
- 3.1.5. Initially, I was at the Directorate of Ancient Monuments and Historic Buildings, where I worked in the Crown Buildings Advisory Sections, which included many of the country's finest public buildings and was seconded to the Property Services Agency to establish and run the PSA Conservation Unit responsible for the Government's historic estate.
- 3.1.6. I then joined the Frizzell Partnership (established c1948) in 1984 and after taking over the practice, the work evolved to include planning and legislative matters including important commissions in the realm of urban planning and regeneration.
- 3.1.7. The work of Heritage Architecture Ltd includes conservation projects of architectural and heritage and townscape consultancy work. We work across a broad range of projects in both the private and public sectors, from finely detailed conservation work and architectural projects to heritage and townscape assessments for large new developments in sensitive contexts. I have been called upon to provide specialist professional conservation opinions and evidence at many appeal hearings and public inquiries.
- 3.1.8. Heritage Architecture Ltd has carried out innumerable appraisals within various legislative environments since commencing practice and have made a particular

speciality of addressing the requirements of the National Planning Policy Framework (NPPF) and the National Planning Practice Guidance (PPG) as well its predecessors.

3.1.9. We have previously provided heritage consultancy services in relation to the Grade II listed Roche office building (now residential 'Griffin Place', which is located within the setting of the Appeal Site.

3.1.10. I have utilised my extensive experience gained from advising on architectural design, townscape and built heritage matters. Therefore, this appraisal has been written from my point of view as a trained and experienced heritage and townscape professional.

4. SCOPE OF PROOF OF EVIDENCE

4.1. Scope

4.1.1. In this PoE I will address heritage and townscape matters, including visual impact, and in so doing address RfR3a. This is the second part of RfR 3. The whole of RfR3 is copied below for completeness, with RfR3a indicated in bold:

4.1.2. *"The proposal by reason of its form, height, bulk, scale and massing does not achieve high quality design. **The proposed Development also does not respect or relate to the character and context of the local area and fails to maintain, enhance or improve the character of the existing area.** As such, the application is contrary to Policies D1 and D2 of the District Plan and the Broadwater Road West SPD, Paragraphs 130 and 134 of the NPPF and Policy SP 9 of the emerging local plan."*

4.1.3. The character and context of the local area comprises of a number of heritage assets, as identified in the SLHA HTVIA (Appendix 6 of CD – F1).

4.1.4. The Appellant is presenting two expert witnesses on RfR 3, myself and Mr Simon Camp of Alan Camp Architects, who will respond on matters of architectural quality.

4.1.5. This PoE has had regard to the following policies (these can be found in full in the Statement of Case ('SoC') provided by Mark Westcott of HGH Consulting, CD – F1):

4.2. National Planning Policy Framework (NPPF) (2021)

- Para 126
- Para 130 (formerly Para 127) (a-e)
- Para 134 (former Para 130)
- Para 190
- Paras 199 - 202
- Para 203

4.3. National Design Guide (2021)

- NDG Paras 20 – 22 on Components for Good Design
- These principles largely correspond with Policies D1 and D2 within Welwyn's Local Plan. As these Policies were listed within the RfR, they are of relevance and will be addressed

in tandem with the National Design Guide's components for 'Good Design'.

4.4. Draft Local Plan (2016)

- Policy SP9: "Place Making and High-Quality Design"

4.5. Development Plan: Welwyn Hatfield District Plan (2005) and Saved Polices (2008)

- Policy D1: "Quality of Design"
- Policy D2: "Character and Context"

5. SITE CONTEXT

- 5.1.1. The Appeal Site is located to the east of the railway in Welwyn Garden City, to the south east of Welwyn Garden City station.
- 5.1.2. To the north of the Appeal Site is the construction site for the housing development Planning Applications: N6/2015/0294/PP and 6/2018/0171/MAJ, some of which has been completed. To the east of the site in the Broadwater Road, with residential housing to its east. To the south are a series of small residential streets and cul-de-sacs with 20th century housing including Broadwater Gardens and Coral's Mead; to the west of the Appeal Site is the railway.
- 5.1.3. The large redevelopment of the site to the north of the Appeal Site represents the changing nature of this part of the town, with what was formerly industrial land transforming into residential areas of a new, apartment block typology.
- 5.1.4. The position of the Appeal Site between the two parallel pieces of infrastructure which run north to south, namely, Broadwater Road and the railway. This location tends to contain the site and limits the views towards the buildings in the Appeal Site from locations to the east. From the west the buildings on the subject site are somewhat more visible, across the low-lying railway and low-rise buildings of the Welwyn Garden City Conservation Area which stands to the west of the railway and acts as the main Welwyn Garden City town centre.

6. HERITAGE MATTERS

6.1. Introduction

6.1.1. This section will consider heritage matters by addressing each heritage asset in turn considering their baseline conditions and impact in line with the five step process set out in Historic Environment Advice Note 3: Setting of Heritage Assets, Historic England, 2017 ('HEAN 3') (CD – A5). These five steps require the consideration of assets and their settings, thus:

- Step 1: Identify which heritage assets and their setting are affected
- Step 2: Assess the degree to which these settings and views make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated
- Step 3: A Assess the effects of the proposed development, whether beneficial or harmful, on the significance or on the ability to appreciate it
- Step 4: Explore ways to maximise enhancement and avoid or minimise harm
- Step 5: Make and document the decisions and monitor outcomes

6.1.2. Step 1 has not been included in this section of my PoE. This is because this stage had already been carried out in the Bidwells HTVIA (CD – C-12), and was based on the identification of a zone of visual influence and the consideration of important assets further afield (such as Hatfield House). This step was re-executed as part of my HTVIA for the non-designated heritage assets in the vicinity which were not included in the Bidwells HTVIA (CD – C-12).

6.1.3. Steps 4 and 5 have also not been followed in this section, because this is an appeal and the proposals are now fixed.

6.1.4. As part of this, the findings of the SLHA HTVIA (Appendix 6 of CD – F1 will be explained, having regard to the HTVIA by Bidwells (CD – C-12) and addressing points in the Council's SoC (CD – G-1) and other written representations from Rule of 6 Parties and others.

6.1.5. The appeal site does not contain any statutorily listed buildings or any non-designated heritage assets and does not stand within any conservation areas.

6.1.6. Section 4 of my HTVIA (Appendix 6 of CD – F1 assessed the historic background

and architectural design of the appeal site within its developmental context. It found that the appeal site and the BioPark building which stands on it, is not a lasting relic of the former industrial activity in the area, it is a no more than poor-quality approximation of the finer quality industrial buildings that did once exist (with some still existing) on the east of the railway. My HTVIA found that the building on the appeal site was of no significance, and does not represent the Welwyn Garden City “ethos”.

6.1.7. Section 4 of my HTVIA (Appendix 6 of CD – F1 also considered the contribution that the appeal site made to each of the heritage assets scoped-in for assessment, and it found that in most cases the Appeal Scheme made a negative contribution to the setting and significance of the heritage assets. All other Heritage Assets experiencing no impact, as a result of a greater intervening distance between the Appeal Scheme and the relevant heritage asset.

6.1.8. I note that Council’s SoC, Para 6.61 (CD – G1) infers that the Appeal Scheme may cause some harm to the nearby heritage assets by stating that:

“...particular regard needed to be had to the designated heritage assets within the site and the wider context of this unique setting.”

but it makes no direct reference to impacts caused on **any** heritage assets, including to the Welwyn Garden City Conservation Area; nor to the listed buildings and to non-designated heritage assets.

6.1.9. In the SoCG (CD – D1) under matters disagreed, the council states that it considers the impact on Hatfield House and Hatfield House Registered Park and Garden to be ‘less than substantial’, this is presumably based on advice provided by Historic England (CD – C-20), which will be dealt with in this section.

6.2. Listed Buildings

Hatfield House and Hatfield House Registered Park and Gardens (both Grade I)

6.2.1. Hatfield House (Grade I) and its associated parkland (Hatfield Park Registered Park and Garden, also registered at Grade I) are situated approximately 4km south of the Appeal Site.

6.2.2. The overall significance of Hatfield House is **high - very high**, the heritage asset derives its significance from its historic, archaeological and architectural and artistic interest. Historic interest in the property is extensive but is most notably derived from the property’s links to its previous residents, chiefly the Cecils, an important

family with great political influence dating back to the Tudor period, and for whom the house was built in the 17th Century,

6.2.3. Architectural and artistic interest is extensive and substantial the E-shaped plan of the house offering a fine example of 17th century British Elizabethan/Jacobean architecture, with elaborate detailing and architectural features.

6.2.4. There is also archaeological interest due to the longstanding use of the land prior to the construction of the house, there is also standing archaeology inherent in the structure of the building with innumerable examples of exquisite craftsmanship as well as lasting evidence of its past inhabitants.

6.2.5. Further detail regarding the significance of the heritage asset is set-out in Section 6.4 of the HTVIA and the full assessment of contribution that the setting of Hatfield House makes to its significance, using the HEAN 3 checklist (CD – A5), can be found in Appendix 2 of the Appeal Submission Material (Appendix 6 of CD – F1).

6.2.6. As described in HEAN 3 (CD – A5) the extent of the setting is dependent on many factors and can include the heritage assets physical surroundings, as well as other intangible associations or contributing factors such as noises, smells. In the case of Hatfield House, its setting is undoubtedly comprised of the Park and Garden in which it sits. This is due to its historic associations, the choice of the park as the location of the building, the longstanding association the park served (and continues to serve) as the parkland for the house, as well as the intervisibility between the house and its gardens.

6.2.7. The publicly accessible areas of Hatfield House have no intervisibility with the BioPark building and there is a great distance and no historic or other intangible associations between the two buildings, so it is not considered that the BioPark building forms part of the heritage asset's setting (as set-out in Section 6.4 of my HTVIA). Even if the BioPark building were to be considered part of the wider setting of the house is not an aspects of the heritage asset's setting from which it derives any significance. By contrast, the aspect of the heritage asset's setting from which it derives a great deal of setting is the parkland, for the reasons set out in the previous paragraph.

6.2.8. The overall significance of Hatfield House Park and Garden (Grade I) is **very high**. The heritage asset derives its significance from its historic, archaeological and architectural and artistic interest.

- 6.2.9. Historic interest in the Park and Garden is derived from its long history and various uses, including its Medieval monastic function, use by the Tudor monarchs including Henry VIII and Elizabeth I as a country retreat, and subsequently due to its function as a parkland for Hatfield House and its links to the notable residents and characters associated with the house.
- 6.2.10. Architectural and artistic interest in the Park and Garden is derived primarily from its transformation into a designed garden and parkland with numerous areas including formal Italianate walled garden, long drive and the lasting forest and parkland which are remnants of the historic (Medieval) use. There is archaeological interest associated in the parks longstanding history which yields some potential for below ground archaeology, There is also some above ground archaeology held in the craftsmanship and execution of the garden designs which represent several evolutions of garden design history and style.
- 6.2.11. Further detail regarding the significance of the heritage asset is set-out in Section 6.5 of my HTVIA (Appendix 6 of CD – F1) and the full assessment of contribution that the setting of Hatfield House Park and Garden makes to its significance, using the HEAN 3 checklist, can be found in Appendix 2 of the Appeal Submission Material (Appendix 6 of CD – F1).
- 6.2.12. The setting of this large, and wide-ranging heritage asset (which is over 7.5km sq) is made up of largely modern townscape such as Hatfield to the West, the Great North Road to the south, as well as some agricultural land to the east. The designated Park and Garden does not derive much of its significance (if any) from these areas of its setting. It does derive significance from Hatfield House, which stands within the park, and the numerous heritage assets which stand on the Park's western edge near Old Hatfield, that are linked to the history of Hatfield House and the Hatfield House Registered Park and Garden.
- 6.2.13. It is noted that at Para 144 (Section 6.5) of my HTVIA (Appendix 6 of CD – F1), where significance of these assets is investigated, I say that:
- 6.2.14. *“From ground level in the parkland there is no visibility of BioPark building, so the building on the current site has no impact.”*
- 6.2.15. This is an error. The Appeal Site is very marginally visible from certain locations in the Registered Park and Garden. This error has been pointed out by John Boyd of Carter Jonas who has prepared a written representation on behalf of Gascoyne Estates, the owners of Hatfield House, in para 6.42 – 6.43 of his document (CD –

E1). I am grateful for this anomaly being pointed out. However, Mr Boyd seems to have overlooked that I have stated the same in my HTVIA (Appendix 6 of CD – F1), in discussing the visibility of the Appeal Site at Paras 200 – 202; and again and Para 300.. In Para 200 of my HTVIA (Appendix 6 of CD – F1) I state:

“Again, similarly to Hatfield House, there is no visibility of the Appeal Scheme from ground level, apart from at a couple of very specific locations in the park.”

6.2.16. More importantly, the viewpoint 13 represents a view that is not publicly accessible. This was not apparent during the initial inspection, as the views were taken at a time when the entirety of Hatfield House was closed to the public due to covid restrictions (January 2022), and special access to the site was granted. On returning later (May 2022), it was pointed out to me by the staff that the entire south front area in question, was out of bounds to the public. I did not therefore have the opportunity to properly consider this in my HTVIA assessment and is of great importance in the consideration of impact (which is discussed further at Para 6.2.16).

6.2.17. The fact of the lack of visibility of the BioPark building from the vast majority of both of these two highly significance heritage assets is of great importance, as the impact on heritage assets needs to be considered as a whole, not just through specific views, as shall be expounded below in due course.

6.2.18. That said, the use of visualisations is important to the assessment of impact on heritage assets, as stated in HEAN 3 (CD – A5).

6.2.19. Following the original planning application, Historic England requested additional information from the applicant regarding impact on Hatfield House (Grade I) and the Registered Park and Garden (Grade I). Accordingly, Bidwell’s produced an Addendum to their initial HTVIA (CD – C-13) in February 2021, to provide further detail on the relative visual impact of the development. This information included additional visualisations, represented as “wirelines” only. Some existing and proposed views were also magnified.

6.2.20. Historic England provided comments on the application on 3rd March 2021 (CD – C20), following the submission of the Bidwells Addendum (CD – C-13) in February 2021. They stated that they ‘had concerns’ about the scheme, noting the increased mass of the Appeal Scheme:

“The wider building mass is appreciable from this angle and while individual

buildings may not be possible to discern (sic) from this distance, the increased size of built form is visible and would have a direct impact upon longer range views from the Grade I listed building”

6.2.21. Based on the Figures 1 and 3 in the Addendum (CD – C-13), Historic England concluded the proposals would incur “less than substantial harm”. The advice given by Historic England was based on the visualisations in the Bidwells Addendum which, as Historic England say, “...it is appreciated that a wire diagram cannot show articulation within the mass...”

6.2.22. When I was commissioned to undertake an independent assessment, I sought to commission new fully-rendered visualisations to illustrate the scheme in a fully photo-realistic manner. These updated visualisations are included in the SLHA HTVIA (Appendix 6 of CD – F1).

6.2.23. The other key difference between the images in the SLHA HTVIA (Appendix 6 of CD – F1) and those of Bidwells Addendum (CD – C-13) is that those in the SLHA HTVIA have not been zoomed-in or enlarged. This is compliant with Landscape Institute Guidance Note 06/19 for the presentation of images (CD – A7), which advises that AVRs should be taken with 50mm FL lens with approximately 39.6 Horizontal Field of View (HFoV) image and printed at a size of 390mm x 260mm on an A3 sheet. These technical specifications are the industry standard and have been carefully formulated to provide a representation that is as close as possible to human vision (whilst offering a monocular rather than a binocular view). As such, the visuals presented in the SLHA HTVIA (Appendix 6 of CD – F1) offer a depiction that is highly accurate and properly representative to what would be experienced by receptors with the naked eye..

6.2.24. Historic England were contacted in May 2022 for updated advice in light of the new visualisations provided in my HTVIA. In their letter dated 10th June 2022 (CD – E3), Historic England confirmed that they have not changed their view on the ‘less than substantial harm’ caused to the scheme because “...*the buildings would appear in the view between the central clock tower and the chimneys on the east wing. The mass of the proposed buildings emphasises the redevelopment of the site.*”

6.2.25. It is noted also that Historic England's latest advice (CD – E3) finds the impact to be extremely low, “*less than substantial harm low in scale*”.

6.2.26. The SLHA HTVIA (Appendix 6 of CD – F1), found that whilst the mass of the

Appeal Scheme is greater than that of the present BioPark building the materiality – particularly in terms of colour - of the Appeal Scheme, makes the new building far less visible than that of the existing. Historic England's latest advice (June 2022 CD – E3) has made no reference to the materiality in my HTVIA. I feel this is an oversight, as they referred to the lack of materiality in their previous advice in March 2021 (CD - C20) and the inclusion of the material treatment of the Appeal Scheme in these new visuals shows how the building appears to shrink into the background and is far less visible than might have been supposed from the previous wireline visuals featured in the Bidwells Addendum (CD – C13). I therefore dispute Historic England's assessment of "less than substantial harm". It is actually negligible, and the impact is neutral.

6.2.27. It is noted as well that, following Historic England's letter in March 2021 (CD – C-20), a subsequent, independent review of the Bidwell's Addendum (CD – C-13) was undertaken by a Senior Built Heritage Consultant at Place Services, (representing the Council) who conversely determined the proposals would result in an overall neutral impact and, as stated within Para.9.49 of the PCR (CD – C-24), *'there is disagreement between them that there would be harm to the heritage assets. One expert identifies less than significant harm and the other identifies a neutral impact'*.

6.2.28. As previously mentioned, views only represent specific glimpses of impact, and not the impact on heritage assets as a whole. John Boyd attempts to highlight this in his representation (CD – E1); although his assertion that *"...the analysis in part 5 of the HTVIA which covers the impacts on Hatfield House is concerned with views and not with setting, as indicated by the references to receptors and sensitivity."* (Para 6.44) is incorrect.

6.2.29. Section 5 of my HTVIA (Appendix 6 of CD – F1) describes the Appeal Scheme proposals. Section 6.14 details the impacts on all the heritage assets. This is a distinct section from the Visual Impact Assessment (Section 9) which examines the townscape impact through the views.

6.2.30. Paras 197 – 202 of Section 6.14 of my HTVIA (Appendix 6 of CD – F1) address the heritage impact on Hatfield House and Hatfield House Registered Park and Garden. There is no use of the word 'receptor' and whilst the word 'sensitive' is used, this is to describe "the most sensitive part of the heritage asset." (Para 200).

6.2.31. I do refer to the views in from the visual impact assessment in Paras 197 – 202 of Section 6.14 of my HTVIA (Appendix 6 of CD – F1), but not because the

assessment is “concerned with views and not setting” as John Boyd asserts (CD – E1). On the contrary, I refer to the views in order to articulate how the impact on just one specific part of the heritage asset cannot be relied upon to determine impact on the heritage asset as a whole, Para 201:

“The question of impact on this heritage asset really only concerns one or two directed views, rather than an overall impact on the setting of the heritage asset. There is absolutely no visibility from ground level for the vast majority of the park.”

6.2.32. That is to say, the only possible places where impact could be determined are the precise locations of the two selected viewpoints. However, impact is not assessed by means of just two precise viewpoints, but by a full understanding of the physical surroundings, intangible associations and other contributing factors (noises, smells etc., viz: HEAN 3, (CD – A5)).

6.2.33. This is stated in my Para – 202 (Appendix 6 of CD – F1):

“Unlike Hatfield House however, the park is a large overall area, and impact on the asset has to be considered as a whole. Given that the visibility is not experienced throughout, further reduces the already negligible impact on the asset causing no impact, thus constituting no harm.”

6.2.34. John Boyd’s assertion in Para 6.44 (CD – E1), that I do not engage with the impact upon the ability to appreciate and understand the heritage assets significance (as opposed to simply considering impact on setting), is also not correct.

6.2.35. My HTVIA (Appendix 6 of CD – F1) clearly identified what aspects of the heritage assets’ setting makes a strong contribution to their respective significance (as per requirement of NPPF para 194) (CD – A1), and what aspects of setting can allow the relevant significance to be appreciated. For Hatfield House (Para 139 in my HTVIA):

“The most profound aspect of the property’s setting is the Hatfield House Park and Garden, the property obtains a considerable amount of its significance from this park and garden, with long views towards the property along the 1.2km drive, and from all points surrounding it. Further to this, the numerous listed buildings which exist Woodland to the northeast of the property means that it retains clear legibility in its context.”

6.2.36. And for the Registered Park and Garden (para 145) (Appendix 6 of CD – F1):

“As a landscape/parkland asset itself, this heritage asset does not derive much of

its significance from its own setting, which is largely contained by modern urban development such as Hatfield to the West, the Great North Road to the south, and agricultural land to the east. The designated Park and Garden derives significance from Hatfield House, which stands within the park, and the numerous heritage assets which stand on the Park's western edge near Old Hatfield, that are linked to the history of Hatfield House and the Hatfield House Registered Park and Garden."

6.2.37. Whether or not the visibility of the Appeal Site and Appeal Scheme from only two specific locations can really constitute presence within the setting (which is addressed at Para 6.2.41 below), the salient issue is that the presence of the Appeal Site and the Appeal Scheme in the wider vicinity does not affect the aspects of the heritage assets' settings from which they glean the most significance. The aspects, which allow for the significance of these heritage assets to be appreciated (and are mentioned above), are left unaffected.

6.2.38. Moreover, Paras 197 – 202 in my HTIVA (Appendix 6 of CD – F1) all clearly state that the impact on the heritage asset itself is what is being discussed, not the impact on setting. At Para 198: *"Furthermore, the only place where the change is appreciable is from the roof of the property, not from ground level. Even then, this change is so minute as to not really be appreciable with the naked eye from the heritage asset; and the change is certainly not sufficient enough to warrant any kind of impact."*

6.2.39. And at Para 202:

*"Unlike Hatfield House however, the park is a large overall area, and impact on the asset has to be considered as a whole. Given that the visibility is not experienced throughout, further reduces the already negligible impact **on the asset.**"*

6.2.40. In Para 6.44 of John Boyd's representation (CD – E1), he criticises the lack of the use of the terms 'positive', 'negative' or 'neutral'. There is no statutory obligation to conclude in these terms. The NPPF (CD – A1) only requires consideration of whether or not 'harm' is caused (and whether that is substantial, or less than substantial), and Historic England Guidance in HEAN 3 (CD – A5) only requires the impact to be described in relation to beneficial impacts or 'harm'. In concluding "no impact" and "no harm" my HTIVA (Appendix 6 of CD – F1) is in compliance with statutory policy and guidance.

6.2.41. In Para 6.45 (CD – E1) John Boyd questions my assessment of the Appeal Site and Appeal Scheme as being outside of the setting of Hatfield House and Hatfield

House Registered Park and Garden. John Boyd states that this is not credible because:

“...the existing building can be seen from both assets and forms part of the context within which the heritage assets are experienced.”

6.2.42. I maintain the overall ‘no impact’ assessment. Despite the visibility of the Appeal Site from two very specific locations within the park, I consider that it causes no impact on Hatfield House Registered Park and Garden. Given that the park is a large overall area, the impact has to be considered on the asset as a whole. Furthermore, simple visibility does not equate to impact *per-se*.

6.2.43. Firstly, the existing building can only be glimpsed from very specific locations from both assets. Furthermore, as shown by the AVRs provided by Rock Hunter in my HTVIA, the Appeal Site cannot be understood as a distinct form or even a building, it is a shape that appears as an indeterminable townscape fragment, amongst a myriad of such fragments, in the wider landscape (As discussed at Para 300 of my HTVIA, Appendix 6 of CD – F1). The HTVIA thus concluded a ‘no impact’ which in turn, would equate to ‘no harm’ upon Hatfield House and the Registered Park and Garden (it is of note that the Bidwells HTVIA (CD – C-12) found the impact on Hatfield House and Hatfield House Park and Garden to be neutral, and this was maintained in the subsequent Addendum HTVIA (CD – C-13)).

6.2.44. The accusation in Para 6.45 that I would have assessed the overall impact on the heritage assets for strategic purposes, is to undermine my credibility as a practitioner. I have assessed the impact as ‘no impact’ because that is my professional judgement, taking into account the overall significance of the heritage assets, the consideration of what ought to constitute setting and the lack of impact caused.

6.2.45. I note that John Boyd does not actually counter the outcome of the assessment (‘no impact’ and ‘no harm’) (CD – E1), he only criticises my methodology and motivations. The Appeal Scheme does not alter or diminish the ability for the significance of the heritage assets in question to be understood in any way, and as such, there is no impact caused.

6.2.46. The negligible impact must also be considered in the light of the fact that the view of the principal south front of Hatfield House, which concerned Historic England (CD – 20) and Mr Boyd (CD – E1), is not part of the public realm of the Park & Garden. It is the private domain of the family and therefore is even lower level of

receptor sensitivity.

6.2.47. I invite The Inspector to make a judgement by taking the subject views in person from these points. However, the view from the south is not within the public domain, The Inspector will need to obtain special permission for access, which will need to be accompanied.

Former Office Block (Buildings 1 to 4) to Roche Products Factory, Grade II ('Former Roche Office')

6.2.48. The overall significance of Former Roche Office building is high due to its historic, architectural and artistic interest. There is not considered to be a great archaeological interest in the site, as it does not fall within an archaeological priority area, and the area around the site continued to be farmland from the medieval period into modern history and the site of the former Roche Offices remained undeveloped land until the buildings in question were constructed.

6.2.49. The historic interest in the former Roche building is derived from the fact that it was designed in 1934 by Otto R Salvisberg, who was an important early 20th century Swiss modernist architect, and its design as an important early example of Modernist factory architecture in the UK using Salvisberg's "inside out approach" in which prioritised the proportions of rooms and usability of spaces. Another aspect of historic interest is in the role that the building played in Ebenezer Howard's overall vision for Welwyn Garden City, with the industrial buildings on one side of the railway, and residential area on the other.

6.2.50. Architectural and artistic interest is found in the building's exemplary early Modernist design with simplistic elegance in the overall form with a projecting flat roof that emphasises the horizontality of the building, reinforced concrete and steel construction with white rendered exterior, hallmarks of Le Corbusian design principles.

6.2.51. The setting of the heritage asset is made up of a combination of modern residential buildings and larger, light industrial buildings along the Broadwater Road.

6.2.52. The buildings in the heritage asset's direct setting (chiefly those that comprise of the same site), either match or surpass the heritage asset in height. Instead of framing and showcasing the heritage asset, the relatively similar aesthetic treatment of the new buildings – white render with fenestration that matches the

windows on the listed building and roughly similar heights and plot size – are too similar to contrast and frame the listed building.

6.2.53. Its former setting of historic factory buildings has largely been lost, with only the former Roche Products building (by James Cubitt and Partners) on the east of Broadwater Road remains.

6.2.54. The BioPark building, which is of a much later construction than the factory buildings which would have formed part of the setting of the heritage asset, currently has a negative impact on the setting of the heritage asset and the asset itself. This is because, when viewed from Broadwater Road, the reflective glazing of the BioPark building detracts from the material quality of the heritage asset, and it fills a gap between the main building of the heritage asset and other adjoining buildings, creating a small but monolithic backdrop of a similar colour in the opening thus detracting from the significance of the heritage asset. The presence of the overbearing mass of the BioPark building in the setting of the heritage asset further detracts as it is notably different from the emerging townscape character, which is residential houses and low to mid-rise blocks, thus acting as an unattractive focus of attention.

6.2.55. The main aspect of its setting from which the former Roche Office building now derives its significance is the Shredded Wheat Factory. Despite the different size, there is evidently a cohesion in the 1930s architecture with similar, white-rendered treatment and has shared modernist features such as fenestration. But the previous commonality in their function is now lost, as the former Roche Building has been converted into flats.

6.2.56. Further detail on the significance of the former Roche Office building can be found in Section 6.3 of the HTVIA, and the full assessment of contribution that the setting of the heritage asset makes to its significance, using the HEAN 3 checklist, can be found in Appendix 2 of the Appeal Submission Material (CD - XX).

6.2.57. My assessment in the HTVIA (Appendix 6 of CD – F1) agrees with the conclusions of Bidwells HTVIA (CD – C-12), in that the Appeal Scheme will have a positive impact on the former Roche Offices.

6.2.58. The Appeal Scheme will allow the former Roche Offices building to have greater primacy in the townscape than it presently has, where the BioPark building tends to dominate. It does that by offering a different material character, so that it provides a notably different backdrop - unlike the present BioPark building which is very

similar in material character and so detracts from the aesthetic and legibility of the heritage asset when viewed from Broadwater Road.

6.2.59. The impact is considered to be minor beneficial, thus constituting no harm.

6.2.60. It is noted that the impact on this listed building has not been directly disputed in the Council's SoC (CD – F1) or by the rule of 6 parties. In the SoCG (Para 6.14 CD – D1) it is agreed that there would be no harmful impact on this heritage asset.

Nabisco Shredded Wheat Factory

6.2.61. the overall significance of Nabisco Shredded Wheat Factory is high due to its historic, and architectural and artistic interest. There is not considered to be any great archaeological interest in the site, as it does not fall within an archaeological priority area, and the area around the site continued to be farmland from the medieval period into modern history and the site of the Nabisco Shredded Wheat Factory remained undeveloped land until the buildings in question were constructed. The fact that the factory building remains standing might have resulted in some potential for above-ground archaeology, yet the buildings have been stripped of their content and machinery, so there is relatively also relatively low potential for above-ground archaeological interest.

6.2.62. The historic interest in the heritage asset is found in the links to the notable architect Louis de Soissons and, as one of the first factories built in Welwyn Garden City, and its importance as part of the execution of Ebenezer Howard's vision.

6.2.63. The architectural and artistic interest of the heritage asset can be found in in the design and execution of the main factory building, with its distinctive 18 grain silos providing definite landmark qualities. The heritage asset is an early example of modern, large-scale silo architecture in the UK with modernist features such as the windows in the ranges and attic storey.

6.2.64. The appeal site has some intervisibility with this heritage asset, particularly in views north and south along the railway. In these views it competes in the skyline, as another form of comparative proportions and scale, but it lacks the design integrity. Given the landmark features of the heritage asset and the fact that the Appeal Scheme distracts and diminishes the extent to which the heritage asset is distinguished from its surroundings, the current impact of the appeal site on the heritage asset is **negative**.

6.2.65. The setting of the Nabisco Shredded Wheat Factory incorporates a range of areas

in Welwyn Garden City with differing characters. Its immediate setting is the railway and the more open, light-industrial plots that surround it, have instigated the transformation into residential areas, as part of the Shredded Wheat Quarter scheme. Whilst setting is not limited to visibility, the fact that the Nabisco Shredded Wheat Factory has landmark qualities and is visible from a greater distance than say, the former Roche Office building, means that a greater area of townscape experiences intervisibility which does widen the extent of setting in this case.

6.2.66. The wider setting of these assets has been in a state of flux over the past few decades, resulting in a fragmented character of low-quality industrial buildings and new residential which positively responds to the qualities of the significant, industrial buildings to the east of the railway, thus limiting the amount of significance the heritage asset derives from much of its setting.

6.2.67. Whilst there is limited direct intervisibility between the Shredded Wheat Factory and other former factory or commercial buildings of its kind, such as the former Roche Offices building to the south, it can be considered to be in the wider setting and has some commonality and with which it has some affinity by being a 1920s building as it also had an associative factory function and similar, white-rendered treatment and modernist features. The heritage asset does derive significance from this aspect of its setting, similarly, it derives significance from the Welwyn Garden City Conservation Area in this way, due to the historic associations with Howard's vision for the town.

6.2.68. Further detail on the significance of the Nabisco Shredded Wheat Factory can be found in Section 6.2 of the HTVIA, and the full assessment of contribution that the setting of the heritage asset makes to its significance, using the HEAN 3 checklist, can be found in Appendix 2 of the Appeal Submission Material (CD - XX).

6.2.69. My assessment in the HTVIA (Appendix 6 of CD – F1) agrees with the conclusions of Bidwells HTVIA (CD – C-12), in that the Appeal Scheme will have a positive impact on the Shredded Wheat Factory.

6.2.70. The Appeal Scheme will also allow the Shredded Wheat Factory to have greater primacy in the townscape. There is limited intervisibility between the listed building and the BioPark building, but where there is intervisibility (such as looking north and south along the railway), the Appeal Scheme provides the Shredded Wheat Building with greater presence due to its reduced and articulated massing. The different elevational treatment ensures that the form of the new building will no

longer compete with the heritage asset in the skyline, such as is demonstrated in View 10 from Bridge Road (Section 9.9 in the SLHA HTVIA, Appendix 6 of CD – F1)).

6.2.71. The impact is considered to be minor beneficial, thus constituting no harm.

6.2.72. It is noted that the impact on this listed building has not been directly disputed in the Council's SoC (CD – F1) or by the rule of 6 parties (Appendix 6 of CD – F1). In the SoCG (CD – D1) it is agreed that there would be no harmful impact on this heritage asset.

6.3. Conservation Areas

Welwyn Garden City Conservation Area

6.3.1. The overall significance of the Welwyn Garden City Conservation Area is medium, due to its historic, and architectural and artistic interest. As has already been discussed, Welwyn Hatfield has not identified the Welwyn Garden City area as being an archaeological priority area. There have been relatively few archaeological finds in the area, and the area was in use as farmland throughout medieval and modern history and into twentieth century when the planned garden city started construction. Only the railway and some of the roads, pre-date the construction of the town. Despite the presence of these communications routes, the scant occupation of the area means that there is limited potential for archaeological finds.

6.3.2. There is some architectural and artistic interest in Welwyn Garden City but, although the town was certainly one of the best conceived garden cities with regards to its layout and overall urban plan, the standard of architectural quality in the individual buildings is not as high as in other garden cities or garden suburbs. This is reflected in the relatively few numbers of listed buildings within the conservation area boundary, with only seven dating from the Welwyn Garden City development period (there are three others that pre-date it and whilst important buildings in their own rights, do not necessarily make a strong contribution to the overall character of the garden city).

6.3.3. The conspicuous lack of designations amongst the residential streets of the conservation area is indicative of the somewhat mediocre architectural quality and lacking in craftsmanship, exceptional design or details and flourishes. The architectural quality of the place is as a result of the group value of the buildings overall so that there is higher quality in the conservation area as a sum of its parts, than if the parts were individually recognised. In this way it could be considered that

the area is loyal to Howard's vision of the garden city as a democratising force with its greatest asset being in the spaces between buildings and the public, open, green space that can be shared by all.

- 6.3.4. There is historic interest in Welwyn Garden City due to its role in the Garden City Movement in the early 20th century, which aimed to improve the lives of ordinary working people. This movement had great implications in the social policy and planning in the UK and Welwyn Garden City has a lasting legacy as an early experiment in the execution of these ideals.
- 6.3.5. The setting of the Welwyn Garden City Conservation Area is comprised of a continuation of the residential streets to the south north and east, which follow a broadly similar overall pattern and take architectural cues from the design of the buildings within the conservation area. These fringe developments are generally of a poorer design quality and the streetscape has much less emphasis on good quality green open space and long sweeping views, but the overarching continuation of garden city principles in the setting of the Welwyn Garden City Conservation Area positively contributes to its setting.
- 6.3.6. To the east of the conservation area, the designation boundary consciously follows the line of the railway, making this boundary edge the most strongly defined. The modern residential typology which is emerging on the east side of the railway, has larger footprint buildings of taller heights, similar to those of the former industrial commercial and factory buildings in the area. These buildings to the east of the railway do stand in the setting of the conservation area, but the area is evidently separate and has always designed to be so. The exclusion of the industrial zone from the Conservation Area recognises this, and this is evidence of this area being considered a much less 'significant' part of the overall Welwyn Garden City concept – always designed to be separate enough, so as not to impede too much on the quiet, domestic character of the central, residential area. As such, it is considered that the conservation area does not derive a great degree of its significance from this area of built form.
- 6.3.7. The former Shredded Wheat Factory is an exception to this. It has a clear presence in the setting of the conservation area to the east of the railway, with landmark qualities which set it apart from almost all other townscape (this is especially the case due to its size and scale). It has a powerful symbolic impact on the significance of Welwyn Garden City Conservation Area as is an inextricable and legible reminder

of the former function of the eastern zone.

6.3.8. The BioPark building does have numerous points of intervisibility with the conservation area. Whilst it is perhaps at too greater distance to be considered to 'loom' over the conservation area (thanks to the separating space provided by the railway), its unattractive roofscape, light in colour and reflective with unattractive paraphernalia such as plant, flues, grills and louvres is an unattractive monolith visible from some distance in places. In some areas the upper floors of the monolithic block are also visible. The impact on the setting of the conservation area is undoubtedly negative, with the main focus and understanding of the building not relating to its design, but rather to its bulk and unattractive roof form and, whilst the building appears in the setting of the conservation area, the heritage asset does not derive any significance from this aspect of its setting.

6.3.9. Further detail on the significance of the Welwyn Garden City Conservation Area can be found in Section 6.6 of the HTVIA, and the full assessment of contribution that the setting of the heritage asset makes to its significance, using the HEAN 3 checklist, can be found in Appendix 2 of the Appeal Submission Material (Appendix 6 of CD – F1).

6.3.10. For this heritage asset, as with the two previously discusses, my assessment in my HTVIA (Appendix 6 of CD – F1) agrees with the conclusions of Bidwells HTVIA (CD – C-12), in that the Appeal Scheme will have a positive impact on the Welwyn Garden City Conservation Area.

6.3.11. The Appeal Scheme will represent an enhancement in relation to current appearance of the appeal site. This is as a result of improvements to the design of the building, particularly at roof level, which is all that is visible from the Conservation Area.

6.3.12. Again, as discussed previously, impact on heritage assets is not limited to direct intervisibility or conjunctive views. But when the heritage asset is separated by a physical divide, which is the case in this instance, where the railway cuts-off the heritage asset from the appeal site and its surroundings. There is limited direct visual connectivity between the conservation area and the appeal site, limiting other environmental factors which might, in other cases cause impact (HEAN 3, CD – A5)).

6.3.13. As such, the aesthetic and design factors are especially important in this case, and the Appeal Scheme benefits the Welwyn Garden City Conservation Area by

improving its setting and the Appeal Scheme will enhance and improve the character and context of the existing area. This is because of the nature of the existing BioPark building on the appeal site, particularly its roofscape, which is visible in numerous points in the conservation area and is a detracting feature. The design of the Appeal Scheme has been informed by the surrounding character of the area, such as red clay tile mansard roofs, which are the most visible and obvious design feature. They have a direct affinity with the character and materiality of roof forms found on the taller, larger footprint blocks in the commercial area.

- 6.3.14. Further to this, the Appeal Scheme provides elevations with a fine grain, evidenced by the balconies, fenestration and street-level opening, which relate to human scale and make the scheme comprehensible as a domestic residential scheme.
- 6.3.15. This has been the subject of some contention, particularly in the representations from Rule of 6 parties. Welwyn Garden City Society ('WGC Society') in Para 65 of their SoC (CD – I1) state that the Appeal Scheme is "too large, too bulky and too tall" and causing "significant and irreversible harm". It is not clear by what comparators it is perceived as too bulky and too tall; nor is it specified as to what harm is caused. If it is to be presumed that they mean there is harm to the Welwyn Garden City Conservation Area, the nature of the impact is not explained.
- 6.3.16. To understand impacts on heritage, consideration needs to be given to a number of factors including the significance of the heritage assets themselves and their settings, as well as issues relating to the urban environment and context in general (matters such as intervisibility and cumulative schemes: HEAN 3 (CD – A5)). These factors, and numerous others necessary in understanding impact on heritage have been considered in detail in my HTVIA (Appendix 6 of CD – F1) and the conclusions on impact on the heritage assets have found that there would be no harm caused.
- 6.3.17. Whilst the Appeal Scheme may have a greater mass at a higher level than that of the existing BioPark building, this does not equate to the building being more visible. And even if it were, the fact of increased visibility does not equate to increased adverse impact. The improvements in design regarding the roofscape of the Appeal Scheme are considered to be so much an improvement, that I concluded in my HTVIA (Appendix 6 of CD – F1) that the impact is reduced in relation to the existing, and is minor beneficial, thus constituting no harm and sustaining and enhancing the special character of the conservation area.

6.3.18. Other aspects of setting which do not rely on physical connectivity, such as ambience and noise, will be improved. This is because the Appeal Scheme will restore some vitality to the appeal site, which has been vacant for some time; and its use was exclusive to the occupants. This, and improved amenity space, will have a positive effect on the wider setting of the conservation area.

6.3.19. The impact is considered to be minor beneficial, thus constituting no harm and sustaining and enhancing the special character of the conservation area.

6.3.20. In the SoCG (Para 6.14, CD – D1) it is agreed that there would be no harmful impact on this heritage asset.

Peartree Conservation Area

6.3.21. The overall significance of the Peartree Conservation Area is medium, due to its historic, and architectural and artistic interest. There is thought to be some potential for medieval archaeological remains, but that these will likely have been disturbed by the original construction of the Peartree development. Excavations in the area in 2002 indicated no significant activity.

6.3.22. The architectural and artistic interest of the conservation area is derived from its material palette (red brick, red clay tiles, timber detailing such as fenestration and other features such as porches), the uniformity of the buildings, the planned-in greenery which is typical of the garden city principles and the quiet, suburban ambience set around quiet streets and cul-de-sacs. The area has more runs of terraces than the modern-day Welwyn Garden City Conservation Area, appropriate to the denser housing model.

6.3.23. The historic interest in the Peartree area stems from its formation as part of Louis de Soissons original 1920s plan for Welwyn Garden City. It was planned for lower income housing in comparison to those within the modern-day Welwyn Garden City Conservation Area.

6.3.24. The setting of the conservation area includes Broadwater Road and, to an extent the industrial area to the west of Broadwater Road. Yet, the topography of the conservation means there is a lack of intervisibility between the conservation area and this former industrial area. This includes the Appeal Site which has extremely limited intervisibility with this conservation area (if any). The only way in which the appeal site impacts this conservation area is in its wider setting, as a disused and vacant site which lacks vitality. Although this lack of vitality in the wider setting of this conservation area is not keenly felt in the conservation area.

- 6.3.25. There is a historic link between the Peartree Conservation Area and the former industrial area which forms part of its setting. This is due to the provision of a source of employment for local residents in the conservation area, in a similar manner to those residents in Welwyn Garden City Conservation Area. Yet, the relationship with the former industrial area in terms of setting is also quite different. Welwyn Garden City, as an urban centre has a much more profound relationship with the former industrial area that sits just on the east of the railway, a synergy exists between the two zones. This connection has never been openly legible in the streetscape of the Peartree Conservation Area. Peartree Conservation Area has always been an out-of-town quiet suburb, set further southeast from Broadwater Road and much of the industrial activity, and this characteristic aspect of its significance is upheld.
- 6.3.26. The rest of the setting of the Peartree Conservation Area is a further continuation of the quiet, suburban residential streets in the areas nearby. It is from this part of its setting that the conservation area derives most significance, as this continuation of the suburbs help to re-enforce the semi-rural / suburban tranquillity that characterise this neighbourhood.
- 6.3.27. Further detail on the significance of the Peartree Conservation Area can be found in Section 6.7 of the HTVIA, and the full assessment of contribution that the setting of the heritage asset makes to its significance, using the HEAN 3 checklist, can be found in Appendix 2 of the Appeal Submission Material (CD - XX).
- 6.3.28. The Bidwells HTVIA (CD – C-12) did not assess the Peartree Conservation Area.
- 6.3.29. It is noted that the impact on this conservation area has not been directly disputed in the Council's SoC (CD – G1) or by the rule of 6 parties.
- 6.3.30. The Appeal Scheme will have some minor positive impacts on the Peartree Conservation Area, these will be primarily in terms of the improvement to the ambience in the area to the east of the railway, which forms part of the Peartree Conservation Area's setting. Whilst there will be a positive change in relation to the existing, the change is considered to be negligible overall, thus constituting no harm and sustaining and enhancing (to a small degree) the special character of the conservation area.
- 6.3.31. In the SoCG (Para 6.13 (CD – D1) the Peartree Conservation Area is not listed amongst the assets that are considered to have the potential to experience adverse impact.

6.4. Locally Listed Buildings

- 6.4.1. The Bidwells HTVIA (CD – C-12) did not include an assessment of the NDHAs. The Heritage Assessment (Section 6 of my HTVIA, Appendix 6 of CD – F1) has assessed the four NDHAs (The Free Church, St Bonaventure's, Focolare Unity Centre and the former Cottage Hospital) in accordance with the NPPF (CD – A1) and Historic England Guidance (CD – A4, A5 and A6), which were considered to be most relevant.
- 6.4.2. The significance of The Free Church, St Bonaventure's and the former Cottage Hospital is medium, with architectural interest deriving from their interesting design, with the former Cottage Hospital exhibiting an interesting Free Tudor Manor House Style, which is typically Arts and Crafts, the Free Church having been designed by de Soissons with unusual stepped Dutch gable features, and St Bonaventure's exhibiting a distinguished paired-back design with elegant linear forms. All of these NDHAs have historic interest in being early constituent parts of Welwyn Garden City.
- 6.4.3. The significance of the Focolare Unity Centre which is low-medium, the architecture is of less interest than the others, it lacks elegance and is not so notably Arts and Crafts. The building shares the same historic interest with the other NDHAs in being early constituent parts of Welwyn Garden City.
- 6.4.4. All of the NDHAs sit in the eastern part of the Welwyn Garden City Conservation Area, and share similar settings, namely Parkway to the west, the commercial area to the north and the residential areas on Longcroft Lane to the west with the railway beyond. All NDHAs derive some of their significance from these aspects of their setting, as they are legible zones intentionally designed as part of the Welwyn Garden City Plan. The residential areas perhaps offer most significance as these buildings, all with a civic function, would have served (and continue to serve) the residential population who reside there.
- 6.4.5. The Appeal Scheme is visible in the wider context of these NDHAs, but the railway creates a clear divide between the conservation area and what is beyond, and whilst this could be considered the wider setting, it is very much conceived as a separate area from which these NDHAs do not derive any significance.
- 6.4.6. My assessment in my HTVIA (Appendix 6 of CD – F1) has identified the impact on the NDHAs would be overall positive, (ranging from negligible to minor beneficial). As all of these NDHAs sit within the Welwyn Garden City Conservation Area, the

reasoning for the impact is therefore similar – that – for example - the proposed, red-tiled mansard roofs offer a much more sympathetic design materiality, which melds into the context well, replacing the unpleasant and visually intrusive roof form of the current BioPark building.

6.4.7. It is noted that the impact on these NDHAs has not been disputed in the Council's SoC (CD – G1) or by the rule of 6 parties. In the SoCG (Para 6.13, CD – D1) there are no NDHAs listed amongst the assets that are considered to have the potential to experience adverse impact.

6.5. Conclusion

6.5.1. The Rule 6 parties and other objections are indistinct and comprised of unsubstantiated accusations without reasoned explanation or justification.

6.5.2. I disagree with Historic England's assessment of less than substantial harm (albeit, at the lowest end of the scale), caused to the Grade I Hatfield House and Grade I listed Park & Garden because, as demonstrated in the visuals in my HTVIA, the visual impact can barely be seen with the naked eye. I feel therefore, that the impact is neutral, and causes no harm. I will leave this to the Inspector to determine on his site visit.

6.5.3. The comments by Mr Boyd on behalf of the Gascoyne Estates have also been contested, and not proven.

6.5.4. The impact upon other heritage assets, both designated and non-designated, is, if anything, beneficial

6.5.5. The impact upon relevant conservation areas, is similarly of neutral benefit.

7. SUMMARY OF TOWNSCAPE MATTERS

7.1. Introduction

7.1.1. This section will consider the townscape matters, making reference to the baseline conditions and impacts established in the SLHA HTVIA (Appendix 6 of CD – F1), giving regard to the HTVIA by Bidwells (CD – C-12), and addressing the points of the Council’s SoC (CD – G1) and other written representations from Rule of 6 Parties and others. Reference shall also be made to the National Design Guide, 2021.

7.1.2. The HTVIA provided by Bidwell’s (CD – C-12) selected a set of viewpoints based on a detailed analysis of the character of Welwyn Garden City. The viewpoints were agreed with Place Services (who represent the Council on these matters) during the pre-application process (agreed by email on 13 July 2020). The SLHA HTVIA (Appendix 6 of CD – F1) amended the list of views slightly, adding views that would better demonstrate the impact of the Appeal Scheme (View 3A from the corner of Church Street and Fretherne Road, and View 11 from Barleycroft Road) and removing views where that did not demonstrate any impact (View 08 and View 02 in Bidwells HTVIA). One of the views from Hatfield House (Figure 2 in Bidwells Addendum, CD – C-13) was also removed as it felt this was replicated very closely by View 1 (in Bidwells Addendum, CD – C-13). The acceptability of this revised list has been agreed by the Council’s representative at Inquiry, Mette McLaren in the Townscape SoCG (CD – D3).

7.1.3. My HTVIA followed a methodology based on the GLVIA3 by the Landscape Institute (CD – A8), to assess impact on visual effects (views) and townscape effect (townscape character areas). In addition to the set of views having been accepted by the Council, it is noted that official guidance (Guidelines for Landscape and Visual Impact Assessment, 3rd Edition, 2013, ‘GLVIA3’, paras 6.16 - 6.17, CD – E8), specifically precludes the need for visual impact assessments from private residential locations:

“Consideration of private residential viewpoints is relevant to Residential Visual Amenity Assessment (RVAA) but generally LVIA will use public viewpoint locations”

7.2. Baseline Conditions: BioPark Building

7.2.1. Section 4 of my HTVIA (Appendix 6 of CD – F1) considers the evolution of the area

around the Appeal Site, and the development of the BioPark building itself. The Roche Products site began to be developed to the east of the Appeal Site in the 1920s. This included the construction of a number of factory and office buildings visible on maps from the early 20th Century (refer to Section 4 of the HTVIA). These included some buildings of architectural interest, such as the Grade II listed former Roche Offices and other undesignated buildings, some of some significance and which have been lost, such as the Roche Products Building (confusingly taking-on the name that the BioPark building originally held), which was designed by Cubitt & Partners in 1961 – 1969 and demolished in 2008.

7.2.2. The Appeal Site itself remained a slither of undeveloped land until much later, with a 1970 Ordnance Survey map showing that the site was, as yet, undeveloped. Photographs from 1970 – 1973 show the newly constructed BioPark Building (Figures 6 – 8 in my HTVIA). When it was constructed, the BioPark building was known to have been built as part of the Roche Pharmaceuticals company for research and was referred to as the ‘Roche Products Building’ at the time. This Roche Products Building ceased operations in 2002 and was purchased by the University of Hertfordshire (formerly Hatfield Polytechnic) in 2006 who converted it into a bio science site and the building was re-named the ‘BioPark’ building. For the sake of clarity, I shall continue to refer to it as the BioPark building.

7.2.3. The BioPark building, constructed in the years following the completion of the Roche Products building (which was completed in 1969, now demolished) had a clear resemblance to the Roche Products building. But the Roche Products building was not only designed by a renowned and credible architect (Cubitt & Partners), but also was also of superior design quality with notable features such as the transparent, feature-staircase. The superiority of design was not just in elevational treatment, and the overall form and mass, and even in the arrangement of the blocks – a linear overall form apparently broken up into two blocks, with one side predominantly white rendered with small windows, and the other side with a much higher proportion of glazing, set in long horizontal bands.

7.2.4. By contrast, the elevations of the BioPark building appear unremarkable and generic. The BioPark building has been altered since its original construction, presumably following acquisition by University of Hertfordshire, although this is unknown. Part of the east-facing block has been extended upwards with white-clad, featureless levels, undermining its attempts at horizontality and diminishing the verticality of the brick stairwell. Further to this, the building has accumulated

additional plant rooms at roof level, further undermining any small amount of architectural integrity that it may have once had. It has also accumulated various paraphernalia such as louvres, grills and aerials which further degrade the already mediocre aesthetic of the building. Other detracting features include the highly-reflective glazing on the northern sections which appears distracting and intrusive, instilling a lack of repose (refer to Figures 20, 24, 26 and 27 in Bidwells HTVIA, CD – C-12).

7.2.5. The SoCs of the two Rule 6 parties (CD – H1 and I1) tend to overstate the significance and contribution of the BioPark building.

7.2.6. “Keep the G in WGC & Welwyn Garden City Heritage Trust” (‘KtG & WGCHT’), Rule 6 Party make an assertion at Para 3.32 of their SoC (CD – H1), that the BioPark building was designed by Cubitt, Atkinson and Partners. This is not true. There are two buildings associated with the Roche company which were designed by Cubitt & Partners (who had become Cubitt, Atkinson and Partners by 1970s). The first was the Roche Products Building to the west of Broadwater Road (adjacent to the appeal site) which was constructed in 1961 – 1969 but demolished in 2008 to make way for the residential development on Penn Way (Figure 9 in my HTVIA). I believe this the building that the Rule 6 Party has confused with the BioPark building. There was also the Roche Offices building on the east of Broadwater Road which was designed in 1977 and is still standing. The BioPark building was a later design and is notably inferior to the others, as discussed in detail in Paras 88 – 103 of my HTVIA (Appendix 6 of CD – F1).

7.2.7. Paras 56 of WGC Society’s SoC (CD – G1) states that the existing BioPark building has a ‘benign impact’ due to ‘superior design’. I refute this statement entirely, the BioPark building is not a superior design, as I discuss in detail in Paras 93 – 105 of my HTVIA (Appendix 6 of CD – F1) which demonstrates that any small amount of design integrity the building might have originally had, has now been utterly lost. Upwards extensions have undermined the original design, any previous object synergy between the horizontal building and vertical stairwell has been lost by these upwards extensions. Furthermore, these extensions are white-clad and featureless levels which lack proportional rationality and make the building monolithic.

7.2.8. Further to this, the building has accumulated additional plant rooms at roof level and has accumulated additional paraphernalia such as louvres, grills and aerials which further degrade the already mediocre aesthetic of the building.

7.2.9. On a clear day the reflective cladding and materials on the chimneys and flues are illuminated like a fluorescent beacon, visible from a distance across the Welwyn Garden City Conservation Area.

7.2.10. The Council's representative in the Public Inquiry, Mette McLaren has agreed in the Townscape SoCG at Para 11 that, "*The BioPark building lacks architectural merit and is of low townscape value*" (CD – D3), thus adding further weight to my assertion that the Rule 6 Parties are overstating the significance, the architectural merit and the townscape contribution of the BioPark building.

7.3. Baseline Conditions: Townscape Character Areas

7.3.1. It has been agreed by the Appellant and the Council in the Townscape SoCG that (Para 10) (CD – D3):

"...the Appeal Site is located within what was originally conceived as the 'industrial zone' by Howard. Whilst the 'industrial zone' was conceived as part of the original Garden City vision, it has a separate character and is not of the same significance as the residential and commercial parts of Welwyn Garden City to the west of the railway, as is recognised by the boundaries of the Welwyn Garden City Conservation Area."

7.3.2. Only two of the Townscape Character Areas ('TCAs') assessed in my HTVIA are contained within the Welwyn Garden City Conservation Area: TCA D and J. These two TCAs were the only two to have a 'medium' sensitivity to change. TCA D is commercial, and its main characteristics include its formal layout of central avenue which forms a key open, green space with a distinct semi-circular nodal point to the north; signalling the civic centre, its linear townscape of pan-European character allowing for expansive views, a formalised organisation of space defined by Howardsgate, offices, commercial buildings and flanking residential buildings within the area are largely Neo-Georgian in character. Sporadic redevelopment has resulted in a mixed overall architectural quality, although retains a sense of coherent aesthetic identity through a defined material pallet.

7.3.3. TCA J is residential, with principally neo-Georgian architectural form and appearance, linear paths and roads with wide, green verges and semi-mature trees, spacious plot to each terrace row allowing a set-back creating a front garden away from the road.

7.3.4. Of the four other TCAs, three are to the east of the railway: K, M and N. And one TCA: H, bridges the railway on both sides to the south of the conservation area. All

of these had 'low' sensitivity to change, apart from 'K' which contains the Appeal Site, which had a 'low-medium' sensitivity.

7.3.5. TCAs K and M are light industrial/commercial in character with the character of TCA K being quite fragmented in character due to piecemeal demolition made to the area, although, recent proposals to redevelop the TCA with residential developments have sought to mitigate this. Otherwise, the main characteristics include the former industrial premises, characterised by considerable mass, scale and large footprints. Such large-scale buildings include the listed Shredded Wheat and Roche Office buildings, both listed Grade II. Also contributing to the character are mid-to-late 20th century houses generally set in a cul-de-sac arrangement, some emulating a neo-Georgian appearance, mid-high rise building height, hard landscaping, minimal green space, light cladding materials and enclosed, inactive footpaths and throughfares.

7.3.6. TCA M is the Peartree Modern Business Area, it also has a fragmented architectural character due to piecemeal redevelopment and extensions. There is an inherently industrial feel to the area, characterised by considerable mass, scale and large footprints, a mix of low-to-mid-rise buildings, generally with single pitched roofs and corrugated cladding. There is a large amount of hard landscaping and surface car parks to the centre of the TCA. The townscape quality benefits from wide verges with mature trees around Hydeway Road.

7.3.7. TCAs N and H are residential and range in age, style and quality. TCA N is located to the south of the appeal site, falling within the area of townscape sensitivity but outside that of the Welwyn Garden City Conservation Area. The main characteristics of this TCA are late 20th century housing, principally two-storeys and red brick and low-rise, domestic buildings laid out in a cul-de-sac arrangement. The area benefits from wide, grassed verges and private driveways

7.3.8. TCA H, is located to the south of the appeal site, falling within the area of townscape sensitivity but outside that of the conservation area. It bridges the railway with the Twentieth Mile Bridge to the north creates a strong boundary. There are large, open greenspaces to the north and south of the TCA known as 'Cassie's Field' and 'Porter Taylor Woods' make a minor positive contribution to the TCA.

7.3.9. Other main characteristics include the commercial and recreational development, located in the central area, this includes a running track, tennis courts and a ski centre; all of negligible townscape quality. The gosling Sports Park to the west of

the railway contains large structures which contrast to the finer grain. There are some residential properties within the TCA, of Neo-Georgian character these lie on the periphery of the TCA, fronting onto Chequers Road.

7.4. Baseline Conditions: Views

7.4.1. This section summarises the full baseline assessment found within Section 9 of my HTIVA, the HTIVA should be consulted alongside this section. Similarly, the views correspond to those in Section 9 of my HTIVA, please refer to the relevant baseline and proposed views in the HTIVA. Details of the assessment methodology can be found in Section 2.5 of my HTIVA.

7.4.2. View 01 is taken from College Way where it meets Campus crescent, looking southeast towards the appeal site at Broadwater Way. The view is situated just north of the Parkway, which forms the central focus of the Welwyn Garden City Conservation Area. Whilst there are no listed buildings represented within the view, the planned, formal character of the buildings and their relationship with the semi-circular cap of the Parkway are quintessential to the planned character and appearance of the Welwyn Garden City conservation area (civic core). The view receives a fair degree of footfall due to the proximity to the college building to the north, and bus stop and rail links to the east. The value and sensitivity of the view are considered to be medium.

7.4.3. View 03 is taken from Church Road, looking south east towards the appeal site at Broadwater Way. The principal focus of the baseline view is the bus stop / bike store, which dominates the immediate left of the view with the linear throughfare of Church Road. Various signage and street lighting is principally focused on the south side of the street, around the bus stop. The view is located by a bus stop to the immediate east of Sainsburys supermarket (eclipsed to the rear left of the view), making this an area of high footfall and daily activity. The value of the view is low, and the sensitivity is medium. Clear views of the appeal site are demonstrably obscured by the early mature trees to the right side of the street, even in the winter view so an amended supplementary version of this view was recommended to be taken,

7.4.4. View 03A is taken from the corner of Church Road and Fretherne Road looking south east and has been added as it looks more directly towards the appeal site than the view further west on Church Road and has the potential to be more impacted by the Appeal Scheme. To the right of the view are some of the low-rise

residential houses on Longcroft Lane. In the centre of the view are some early mature trees which are without leaf in this winter view and through these the current BioPark is just visible, although its light colour makes it hard to discern against the pale sky behind. The view is taken from a point within the conservation area, but it does not contain any listed buildings. The buildings to the right of the view are not the main focus and whilst these, and some foliage and hedging are both visible in the view, there is limited townscape value. This an area of high footfall and daily activity because the viewpoint is located at a cross-roads at the edge of the commercial area and just near Sainsburys supermarket. The value of the view is low, and the sensitivity is medium.

7.4.5.View 04 is taken from Parkfields where it meets Longcroft Lane, looking east towards the appeal site at a moderately close range. Longcroft Lane is the principal road running south from the Town Centre, and one of the few straight residential roads in the Welwyn Garden City conservation area and it is this housing that is the main focus of the view. Whilst the view is taken from a point within the conservation area, the view does not contain any listed buildings and is not a key view identified within local planning policy. The receptors that are likely to experience this view are somewhat limited to those that reside in the residential properties around Longcroft Lane and Parkfields, but the preferred pedestrian route for commuters is Church Road, which provides a direct link to the Parkway from the train station. The value of the view is low, and the sensitivity is low-medium.

7.4.6.View 05 is taken from Longcroft Lane, at a point slightly southeast of view 04. The foreground of the view is defined by wide pavements with grass verges, which make a positive contribution to the townscape and the character of the conservation area. The view was selected to illustrate clearer views of the appeal site, which is just visible in the distance between the gap of the terraced housing in the foreground. The roofline of the BioPark is just visible beyond the sparse trees and is read as an incidental contributor in the distance and currently makes a negligible contribution to the townscape view. The receptors that are likely to experience this view are somewhat limited to those that reside in the residential properties around Longcroft Lane and Parkfields, but the preferred pedestrian route for commuters is Church Road, which provides a direct link to the Parkway from the train station. The value of the view is low, and the sensitivity is low-medium.

7.4.7.View 06 is taken from Coral's Mead, looking south towards the appeal site. The foreground of the view is defined by a quiet no-through road, terminated by a low-

rise hedge. The road is flanked on each side by two-storey red brick houses of no definable townscape merit. The Bio-Park building is the principal focus of the view, forming a large-scale building of little architectural merit, punctuating the open sky which is a discernible and positive feature within the view. The receptors that are likely to experience this view are somewhat limited to those that reside in the residential properties around Coral's Meade, which is a no-through road. The value of the view is low, and the sensitivity is low-medium.

7.4.8. View 07 is taken from the A6128 Road, looking north towards the appeal site at Broadwater Way. The baseline view has been selected as it allows for extensive views of the East Coast Mainline railway and sidings, which forms the definitive boundary of the Welwyn Garden City Conservation Area. The BioPark building, stands in the middle ground of the view, to the east side of the railway line and makes a negligible contribution to the townscape quality. 276. The A6129 Road is a vehicular route only and does not have any clear pedestrian routes. As a result, the receptors from this particular location are limited to those travelling at great speed, resulting in low sensitivity.

7.4.9. View 09 is taken from Broadwater Road, looking west towards the appeal site. The view has been selected to illustrate the relationship between the appeal site and the Former Roche Office Building (Grade II). The western façade of the Listed Building dominates the foreground of the view, consisting of the former administration block. The four-storey factory is discernible to the left of the administration building, complete with distinct metal framed windows which emulate the buildings industrial character and former use. Beyond this, in the far distance, the appeal site (BioPark) is visible complete with a varied roofline, jutting into the open sky. The receptors that are likely to experience this view are somewhat limited to those that reside in the residential properties visible in the left of the view and those travelling via car along Broadwater Road. It is not therefore, a highly active area with regards to footfall nor is it an area which is susceptible to tourists. The value of the view is medium, and the sensitivity is medium-low.

7.4.10. View 10 is taken from an elevated viewing point on Bridge Road, looking south towards the appeal site. The foreground of the view is formed of mature shrubbery and trees which borders the railway, a large portion of the view to the right is taken up by the network of railway lines which lead onto Welwyn Garden City Station. The BioPark building stands on the far right of the view, just east of the railway line. The visual receptors are likely to be travellers on road via car or bike, where the view is

fleeting and incidental to the journey and does not stand in the line of sight from the direction of travel. The value of the view is low, and the sensitivity is low.

7.4.11. View 11 is another view added by the applicant as part of the Appeal Submission, in order to better demonstrate the impact of the Appeal Scheme on the Conservation Area. is taken from Barleycroft Road, opposite the junction with the Parkway and Birdcroft Road, looking east towards the appeal site (largely eclipsed from view in the far distance, with only parts of the roofline visible to the right of the church). The foreground of the view is characterised by the soft, curved green landscaping of the parkway which forms a designed, open space at the heart of Welwyn Garden City. Beyond this, the middle ground of the view is formed of residential and ecclesiastical buildings, enclosed by tree lined streets and mid-rise hedges, enhancing the private nature of the residential areas. The visual receptors are likely to be residents travelling by foot or car. Due to the proximity to the medical centre and church buildings, receptors here are more likely to be visiting the area on a regular basis and at a time they are able to take in their surroundings. The value of the view is medium, and the sensitivity is medium.

7.4.12. View 12 is taken from the roof of Hatfield House looking north towards the appeal site (form 4km away). The lower half of the view is taken up by the Grade I Listed Hatfield House Registered Park and Garden, which extends towards the horizon. The designed landscape features lawns, pathways and ordered trees. There is some townscape visible above the treeline but below the horizon, to the left of the view the town of Hatfield is visible and in the centre of the view at the vanishing point is Welwyn Garden City. Whilst some townscape is visible due to light coloured materials being visible against eh dark background of the landscape, no individual buildings are easily discernible at this distance. To the right of the view below the horizon line only tree tops are visible - these form part of the woodland of which is part of Hatfield House Registered Park and Garden. The top half of the view is taken up with open sky. There are no discernible buildings which extend into the skyline from this point. This view is taken from the roof. It is not a publicly accessible point which means that there is little to no receptor sensitivity. There is only the occasional access to the roof for maintenance. The value of the view is high, and the sensitivity of the view is medium.

7.4.13. View 13 is taken from the southern end of the parkland in the Hatfield House Registered Park and Garden, looking north towards the appeal site (approximately 5km away). The lower half of the view is taken-up but the lawn of the parkland, with

trees on either side of the view, directing the gaze towards Hatfield House (Grade I) which sits at the centre of the view. In this view the stately home sits below the horizon line, with only the central clocktower breaking above the horizon and into the sky. Above the roofline but below the horizon line some fragments of townscape are visible, due to the lighter colouration of materials against the darker landscape backdrop.

7.4.14. As has already been discussed at Para 6.2.16, is that this viewpoint is in fact not publicly accessible at any time. On an initial visit this was not clear, as the entirety of the property and gardens were closed to the public due to covid-19 restrictions. What has come to light in the intervening time is that, rather than this viewpoint being part of the Park and Garden visitor attraction, this viewpoint is completely inaccessible to the public. Meaning that my assessment in my HTVIA, which concluded there was high susceptibility to change of this view, is incorrect. The viewpoint experiences low susceptibility to change, with very few people able to experience this view. With high value and low susceptibility to change, the overall sensitivity is in fact medium.

7.5. Impacts: Townscape Character Areas and Views

7.5.1. The Bidwells HTVIA (CD – C-12) found that townscape impacts range from neutral to substantial beneficial. My assessment in the HTVIA (Appendix 6 of CD – F1) has subsequently identified that townscape impacts ranged from neutral to minor beneficial. This is broken-down in the Summary of Townscape Effect (Section 9.13) which finds that the Appeal Scheme would have a negligible effect on all TCAs, apart from TCA J (negligible-minor beneficial) and TCA K (which contains the appeal site), which would experience a minor beneficial effect. This was due to the overall low townscape value provided by the BioPark building and the positive improvement offered by the Appeal Scheme.

7.5.2. The Summary of Visual Effect (Section 9.14 in my HTVIA) (Appendix 6 of CD – F1) finds that the Appeal Scheme would have a beneficial effect (either minor beneficial or negligible) on all views, with the exception of views 4a, 11 and 12 (which were determined to be neutral). Despite the differences in outcome for individual TCAs and Views, this assessment agrees with the overall townscape conclusions of the Bidwells HTVIA (CD – C-12), that the Appeal Scheme would result in an overall minor beneficial impact, largely due to the fact that it appears cohesive with the consented development to the north and in views from the conservation area. This beneficial effect was concluded because of the low townscape quality in the

baseline view, combined with the improvement that Appeal Scheme would make particularly at roof level. Details of these conclusions, and salient points relating to these shall be discussed in this section.

7.5.3. It is noted that, both the Hatfield House views (12 and 13 in my HTIVA), experience a neutral effect. This is despite the changes in understanding of susceptibility to change with regards to one of the Hatfield House views (View 13), as explained in Para 6.2.14 and 7.4.14. This is because the visibility of the Appeal Scheme remains as an indeterminate fragment of townscape, darker in colour to that of the existing, and appearing below the horizon line, meaning that it shrinks into the background and results in no change to the overall ability to appreciate the significance of the listed building in the view. The Appeal Scheme has brought forward proposals that are much more sensitive to local context, particularly in consideration of the material palette and roofscape and how these will appear in views.

7.5.4. Saved Policy D2 of the Welwyn Garden City District Plan (2005) (CD – B1a) and Saved Policies (2008) (the 'District Plan') (CD – B1a): "Character and Context" states that:

7.5.5. *"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."*

7.5.6. *The context of a site i.e., the character and setting of the area in which it is located is crucial, and a clear understanding and appreciation of this in the design of new development is the starting point for creating distinctive and attractive places."*

7.5.7. The Appeal Scheme does enhance and improve the character and context of the existing area. Enhancement constitutes an improvement to the character relative to the existing conditions. The means of assessment in considering impact in relation to baseline is in accordance with guidance on the assessment of impact issued jointly by the Landscape Institute and Environment Management and Assessment, GLVIA3 (CD – A8).

7.5.8. The Appeal Scheme has brought-forward proposals that are much more sensitive to local context, particularly in consideration of the material palette and roofscape and how these will appear in views. The large footprint buildings are in-keeping with the historic precedent for the area, which saw large footprint commercial and factory buildings here as part of Ebenezer Howard's vision, and the Garden City ethos of

separating residential from industrial.

7.5.9. Paras 6.66 – 6.67 of the Council's SoC (CD – G1) assert that schemes of 5-storeys or more will be assessed with regards to the potential for adverse impacts. Impacts on heritage, or lack thereof, have been discussed in the previous section of this PoE. The townscape impacts, as shown by the AVRs demonstrate that the townscape and visual effects caused by the Appeal Scheme all range between neutral and minor beneficial impact and so the vague and unexpanded reference to 'potential' adverse impacts does not appear to be based on any empirical evidence but is rather an ephemeral statement that is unfounded.

Impact

7.5.10. Assessment of the impact of schemes is carried out in relation to the existing ('baseline') conditions, as per the official guidance offered by GLVIA 3 (CD – A8).

7.5.11. Due to the nature of the BioPark building on the appeal site, the scheme represents an improvement in relation to the BioPark building which provides only low townscape quality in the baseline conditions (as agreed by Council's representative Mette McLaren in the Townscape SoC) (CD – D3).

7.5.12. At Para 3.32 KtG & WGCHT assert in their SoC (CD – H1 and I1) that:

"...the visual impact of the proposed development on the skyline at its highest point will be significantly greater than the existing building".

7.5.13. This is not expounded or explained. Also, Visibility does not equate to adverse impact, a structure can be visible without being having harmful or any impact. The anomalous appearance of the BioPark building when viewed in the context of the Welwyn Garden City residential buildings typology, the materiality and irregular chaotic roofscape and lack of architectural quality contribute to an adverse impact/ By contrast, the Appeal Scheme will meld into the background and sit more restfully into the roofscape context of its environment, as examined and proven in the Visual Impact Assessment in Section 8 of my HTVIA (Appendix 6 of CD – F1).

7.5.14. Para 3.32 of KtG & WGCHT SoC (CD – H1 and I1), they discuss the opportunity to enhance the skyline. The erratic and disparate skyline is one of the most notable detracting elements of the BioPark building, and the inference that the Appeal Scheme does not serve as an improvement to the BioPark building roofscape, with its plant rooms, louvres, chimneys and flues, is not an accurate understanding of the design of the Appeal Scheme.

7.5.15. Para 43 of the SoC of the WGC Society (CD I1- X) states that the Appeal Scheme would cause “irreversible harm to the local area and the townscape”, yet this statement is not expounded on or explained in any way. The most useful tool for assessing visual impacts are Verified Views which accurately illustrate the impact of the scheme. These have been provided by my HTVIA (Appendix 6 of CD – F1) and show that there is an improvement in townscape impact in relation to the existing building. Reasoning for this statement is set-out at Para 7.5.46 - 7.5.8 and will not be repeated here.

7.5.16. The WGC Society’s SoC (CD – I1) states at Para 56 that the BioPark building through its *“combination of light cladding, few windows and a reflective façade mean that the existing building’s impact is minimised.”*

7.5.17. And at Para 57 point a) that: *“Detrimental impacts that the Proposal will inflict upon local residents include a. negative impact from increased solidity of the facades”.*

7.5.18. These two statements are contradictory. The ratio of fenestration to solid does not relate directly to impact and the conclusion that a reflective façade has less impact. has no rational justification. The Appeal Scheme will actually have more glazing meaning that the façade is less solid than the BioPark building. This is a positive attribute in design terms, giving a perception of “lighter” structure which reduces the perception of bulk and mass. This also assists in the refinement of proportionality of solid and void which contribute to the essential quality of repose and providing human scale.

7.5.19. The WGC Society’s SoC (CD – I1) states at Para 57 point e) that the proposal is incongruous to the Garden City, this is not expounded or explained. Similarly, at Para 6.46 – 6.47 of Carter Jonas’ representation on behalf of Gascoyne Estates (CD – E1), John Boyd questions enhancement and improvement to the character of the area and states that the building does not have these qualities due to mass, external treatment *“when viewed from the town centre conservation area and other vantage points”*

7.5.20. John Boyd makes this assertion without making any reference to or acknowledgement of any of the fully rendered AVRs provided in my HTVIA (Appendix 6 of CD – F1) whilst making this assertion. The AVRs clearly demonstrate that the elevational treatment and mansard roofs provides a far more appropriate backdrop to the Welwyn Garden City Conservation Area, than the present material treatment of the BioPark building, whose light-coloured cladding

and chaotic roofscape are illuminated and emphasised against the dark, rich clay roof tiles of the buildings in the conservation area.

7.5.21. It is my view that, rather than the Appeal Scheme being incongruous, the current BioPark building is incongruous to the Garden City; and the Appeal Scheme is an improvement in these terms (as expanded on in Para 7.5.46 - 7.5.8 of this PoE). Again, this is corroborated by the Principal Urban Designer in the PCR (CD – C24) who concluded that: “...the scheme now sits comfortably within its context.”

Building Height

7.5.22. This refers to building height and design quality, not because the two are necessarily equivalent terms, but because both the council in their SoC (CD - G1), and John Boyd in his representations (CD – C24), attempt to directly equate the lack of design quality with ‘excessive’ building height. Salient aspects of Design Quality, which go beyond building height, are considered in the next section.

7.5.23. Para 6.59 of the Council’s SoC (CD – G1) states that:

“...it is the view of the LPA that the excessive height and scale of the proposed buildings ultimately results in the development failing to achieve a high quality of design which respects and relates to its context and the prevailing character of the area.”

7.5.24. This takes a very limited view of design quality and seems to equate height and poor design quality without explanation. It describes the height as ‘excessive’ without justification and it does not consider nor address any of the other ways in which the Appeal Scheme does provide a positive enhancement and improvement to the character of the existing area (a requirement of Saved Policy D2 of the District Plan) (CD – B1a).

7.5.25. A more nuanced and intelligent assessment of design quality was provided within the Committee Report, September 2021 (refer to para.9.72) (CD – C24), the Principal Urban Designer (representing the LPA) commented that the elevational treatment is of ‘high quality’ and that the scheme constituted high quality for the following reasons:

7.5.26. *“The material palette for the apartment block and townhouse elevations are considered to be a positive response to the traditional materials used in Welwyn Garden City. The proposed mansard roofs (as a dominant architectural feature in the Garden City) are also positive and well-articulated, and it remains the view that*

this treatment will offer something unique and represents a high level of design aspiration and intent”.

7.5.27. I would agree with this statement, which is a direct contrast to the **RfR 3b** (CD – C26) which states that:

7.5.28. RfR 3b: *The proposed Development also does not respect or relate to the character and context of the local area and fails to maintain, enhance or improve the character of the existing area. As such, the application is contrary to Policies D1 and D2 of the District Plan and the Broadwater Road West SPD, Paragraphs 130 and 134 of the NPPF and Policy SP 9 of the emerging local plan.*

7.5.29. The responses during pre-application discussions, referred to in the Meeting Minutes of the September 2021 Planning Committee (the ‘Meeting Minutes’) (CD – C25) indicate the design intent was perceived to be of suitability high-quality; I and had been developed in direct response to the historic context of the site and existing surroundings. This is further highlighted within the committee meeting minutes, in which it was noted that the proposals had gone through:

7.5.30. *‘..three rounds of pre-application cycles as well as a public engagement exercise. This had resulted in a well-considered planning proposal in response to the urban context and brown field site circumstances. The proposal would also make a significant contribution to the council’s proposed housing target’.*

7.5.31. The Meeting Minutes (CD – C25) also stated that *‘Height, scale and massing was deemed by officers to be appropriate in the context of the site, in accordance with relevant design policy and guidance. Officers also confirmed that they were satisfied that the design was of a **high-quality design**’* (my emphasis). This statement is entirely contrary to the conclusions of the **RfR 3b** (CD – C26) and to that of the Council’s SoC (CD – G1).

7.5.32. Para 41 of the SoC of the WGC Society (CD – I1) states that the *“the proposal is higher and bulkier than the existing building outline.”* This is not accurate.

7.5.33. Para 6.69 of the Council’s SoC (CD – G1) argues that whilst the tallest height of the Appeal Scheme is lower than the tallest point of BioPark building, there is more mass present at the highest points of the Appeal Scheme. Whilst this statement is technically accurate this, and the assertion at Para 6.71 and 6.73 of the Council’s SoC (CD – G1) (regarding the two storey mansard roofs), is to discount the vastly

negative and detrimental visual effect of the present unattractive flues.

7.5.34. In comparison, the Appeal Scheme offers a far more sympathetic roofscape, which is appropriate to the Welwyn Garden City typology in form and materiality and provides a superior backdrop to the conservation area and nearby listed buildings.

7.5.35. In essence, the main experience of a building's height can be equated to the experience of its impact. As has been discussed, the Appeal Scheme will offer less of an impact than the BioPark building, as can be clearly seen in many of the views in the visual impact assessment in my HTVIA (Appendix 6 of CD – F1). I draw the Inspector's attention to the relative impacts delineated specifically in Views 5 – 9 where this is particularly well demonstrated. Further, in these views the reduction in overall height is very prescient, demonstrating that the building height argument brought forward by the Council and Rule 6 Parties is really exaggerated.

7.5.36. The Council's SoC (CD – G1) sites the Broadwater Road West SPD, 2008 (CD – B4) para 6.62 and 6.63 which states that:

“New development should not, however, simply replicate existing building mass but relate to those buildings retained and the wider surrounding area.”

7.5.37. The Appeal Scheme does not “simply replicate existing building mass”. The composition of the massing is very different to that of the BioPark building. Whilst the maximum height is similar, and some mass is grouped so as to reference the former building on the site.

7.5.38. It is true, that the Broadwater Road West SPD (CD – B4) recommends a maximum of 5 storeys on this location; but buildings on other sites in the vicinity have also exceeded their recommended heights. There is an obligation for the building on this site to act as a mediator between the taller buildings on sites to the north of the newer residential typology, as well as those two storey buildings located to the south of the Appeal Site. The Appeal Scheme does this through a gradual stepping downwards across the Appeal Site, as is required by the very quote from the Council's SoC (CD – G1) which requires that proposals *“relate to those buildings retained and the wider surrounding area.”*

7.5.39. To this end, the Appeal Scheme does satisfy the requirements at Para 6.16 of the Broadwater Road SPD (as quoted in Para 6.46 – 6.65 of the Council's SoC) (CD – G1):

7.5.40. *“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.”*

7.5.41. And also satisfies Draft Local Plan (2016) (CD – B3) Policy SP9: “Place Making and High-Quality Design” which requires proposals to *“respect neighbouring buildings and the surrounding context in terms of height, mass and scale”*.

7.5.42. Furthermore, the Principal Urban Designer on behalf of the council, supported the Appeal Scheme exceeding the heights set-out in the Broadwater Road West SPD, as set-out in the PCR (CD – C24):

7.5.43. *“The Principal Urban Designer concluded that the scheme now sits comfortably within its context, particularly in light of the extant planning permission for the Wheat Quarter to the immediate north. It is also their view that whilst being taller than the stated heights within the Broadwater Road West SPD, the development would conform with the overarching principles of this design guide.”*

Design Quality: Character, Context and the Garden City Ethos

7.5.44. The Saved Policy D1 in the District Plan (CD – B1a) is concerned with design quality and states that:

“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.”

7.5.45. The National Design Guide (2021) (the ‘NDG’) (CD – A2), which is the key tool in national guidance for assessing quality of design, includes **“Context – Enhances the surroundings”**, and **“Identity - attractive and distinctive”** within its ten characteristics. These are the two terms which most relate to the “Context” and “Character” definitions of RfR3b (CD – C26).

7.5.46. These terms also align closely with three of the seven design principles which the Council seek to apply to Saved Policy D1, quoted above (refer to paragraph 7.14 of the District Plan) (CD – B1a). They are ‘Character’, ‘Legibility’, and to a lesser extent ‘Continuity and Enclosure’.

7.5.47. As set out in the DAS (CD – C1) and the PoE provided by the architect, Simon Camp (CD – F5), the Appeal Scheme has taken criteria in its design from the surrounding character of the area, including both the Welwyn Garden City

Conservation Area and also the residential areas further east of the site. These characteristics take the form of red clay tile roofs and fine grain elevations which have a legible domestic scale. Listed buildings have been referenced, with pilotti, similar to those found on the former Roche Offices featured.

7.5.48. The Appeal Scheme also allows the former Roche Offices and the Shredded Wheat Factory to have greater presence without the BioPark building. In the case of the Roche Building, this is done by offering a different material character, so that the Appeal Scheme acts as a notably different backdrop (unlike BioPark which was very similar in material character), and for Shredded Wheat by reducing and breaking up the mass, and offering a different elevational treatment, so that the forms no longer compete with the heritage asset in the skyline. This complies with the 'Legibility' term in paragraph 7.14 of the District Plan (CD – B1a), and "Identity - attractive and distinctive" in the National Design Guide (CD – A2).

7.5.49. With regards to 'Continuity and Enclosure' the District Plan (CD – B1a), the design of the Appeal Scheme offers greater continuity, especially with regards to the Shredded Wheat Quarter scheme, which is currently under construction to the north of the site; and in a wider sense by appearing in the setting, and continuing the sense of continuity for many other residential properties both within the Welwyn Garden City Conservation Area and to the east of the railway.

7.5.50. The Appeal Scheme will open-up a previously inaccessible site so that it can be accessed and used by many more people, including residents of the scheme and people who may wish to use the surrounding amenity space in which the blocks are set. Thus, constituting a great enhancement to 'enclosure' (District Plan) (CD – B1a), and can certainly be said to therefore enhance its surroundings, as per the 'Context' term of the NDG (CD – A2).

7.5.51. Further to this point on 'Context', the NDG (page 10) (CD – A2) states that well-designed places are based on a sound understanding of the features of the site and the surrounding context, using baseline studies as a starting point for design; integrated into their surroundings so they relate well to them; influenced by and influence their context positively; and responsive to local history, culture and heritage.

7.5.52. With regards to 'Identity' in the NDG (CD – A2), point 59 states that 'larger scale new developments, such as garden villages or urban extensions, may benefit from a variety of characters so that different areas or neighbourhoods each have their

own identity’.

7.5.53. The NDG (CD – A2) indicates that both context and identity are intrinsically interlinked with local heritage and local character. In order to be successful, new developments must seek to be distinctive whilst taking cues from the local vernacular; and to suit the existing context. Ultimately, the key objective for new development is to be identifiable to the local community through use of appropriate form, scale, proportions, design, materials, details and patterns.

7.5.54. I consider the Appeal Scheme strikes a successful and carefully considered balance between the industrial and residential aesthetics representative of the Appeal Site location, and the “Garden City ethos,” it being within the historic industrial area of Broadwater Road West; and yet neighbouring a number of residential developments. This is achieved through the architectural features which include, industrial black framed windows and “art deco” influenced curves and contrasting domestic scaled mansard roofs and bronze dormers.

7.5.55. The proposed height and scale of the Appeal Site responds to the historic precedent of large, industrial buildings to the outside edge of the residential core, just west of the Railway. A continuation of development in a more domestic scale to the immediate east of the railway line, would be more harmful to the adjacent Welwyn Garden City Conservation Area, by diluting the experience of a clear differentiation of character and a backdrop of larger buildings to the periphery of the town, as per Howard’s original design concept. The industrial built form in this part of Welwyn Garden City has left a legacy of larger footprint buildings. The present cultural context demands that use of the Appeal Site be evolved to accommodate residential dwellings, yet it would be appropriate to continue the legacy of the larger footprint buildings so that Howard’s original design intent is continued in a revived form. This preserves to a degree the “archaeology” of Howard’s town planning ethos.

7.5.56. It is noted that the blueprint for the Garden City ethos (Ebenezer Howard’s ‘Garden Cities for To-Morrow’) (CD – A12) was authored over a century ago and inevitably, the pertinent aspects of this concept have had to adapt to correspond with modern requirements as time has moved on. In many ways the problem which Howard was trying to address, the urban migration of working populations from the countryside to cities and the resulting socio-economic issues that this has caused (“...yes, the key to the problem how to restore the people to the land--that beautiful

land of ours.”¹) is not of such great relevance today. What is more important is Howard’s original social intent to democratise living standards in urban environments. This is not limited to the integration of greenery and nature into settlements, as the name might imply, but is strongly founded on the belief that all people should have fair access to employment and affordable living to secure a good quality of life:

“ I will undertake, then, to show how in “Town-country” equal, nay better, opportunities of social intercourse may be enjoyed than are enjoyed in any crowded city, while yet the beauties of nature may encompass and enfold each dweller therein; how higher wages are compatible with reduced rents and rates; how abundant opportunities for employment and bright prospects of advancement may be secured for all; how capital may be attracted and wealth created; how the most admirable sanitary conditions may be ensured; how beautiful homes and gardens may be seen on every hand; how the bounds of freedom may be widened, and yet all the best results of concert and co-operation gathered in by a happy people.”²

7.5.57. Howard’s ideas were actually instigated by Louis De Soissons and Arthur Kenyon, the City’s Architects. Howard intended that the social classes would be integrated in an early attempt at “levelling up” as had been attempted elsewhere by idealistic saloon-bar socialists; but the ingrained prejudicial class system defeated that. Welwyn Garden City Ltd located the middle and upper-class houses near the commercial centre on the west, while the working-class houses were built to the east of the of the railway beyond the industrial zone. This made the working class “on the wrong side of the tracks” as noted later pundits. This sense of physical and social division was further exacerbated by the requirement of the railway company that a one-eighth of a mile clear zone be maintained each side of the running line; and the line itself was crossed in only three places.³

7.5.58. The development of the former industrial area with residential buildings, accords

¹ Howard, E. (1902). Garden Cities of To-Morrow. Second Edition. Page 13

² Howard, E. (1902). Garden Cities of To-Morrow. Second Edition. Page 18 (CD – A2)

³ *Paradise Planned: The Garden Suburb and the Modern City* Robert A.M. Stern, David Fishman, Jacob Tilove (CD – A11)

more emphatically with Howard's original principles. Therefore, the Appeal Scheme, and other similar residential developments, will rebalance this social disparity by Appeal Scheme bringing back something of Howard's original vision.

7.5.59. The adjacent Shredded Wheat masterplan development illustrates a successful and forward-thinking approach to reimagining the former industrial zone at Welwyn. The recently approved masterplan ensures the significant Listed Building remains the focal point of the area, whilst accommodating residential development which compliments modern needs and does not detract from the character-defining components of the designated heritage asset. The Shredded Wheat Quarter sets a precedent for the opportunities the industrial zone presents, in which large footprints of new development would be deemed appropriate despite the change in use as residential.

7.5.60. It is also noted that, due to the statutory obligations in place as part of our planning system which protect standards of living and wellbeing, the mire of the city which Howard rejects, is less of a reality today than it was a hundred years ago. This means that "*third alternative*" which Howard extolls ("*in which all the advantages of the most energetic and active town life, with all the beauty and delight of the country, may be secured in perfect combination*"⁴) is not uniquely found in Welwyn Garden City, but can actually be an accessible reality found in well-designed schemes in towns and cities.

7.5.61. Simon Camp, in Section 10.3 of his PoE (CD – F5) identifies aspects of the Garden City ethos that remain pertinent for modern design; the need to provide for a strong community, through ordered development and environmental quality, and he sets out the numerous ways in which the Appeal Scheme embodies these principles.

7.5.62. The celebration of interaction between home and outdoor space which contributes to a healthy community has, as explained by Simon Camp, been delivered in the Appeal Scheme because, not only do dwellings have plentiful amenity space, but there is also a shared allotment and open landscape courtyards within the scheme that bring gardens and access to nature directly to residents'

⁴ Howard, E. (1902). Garden Cities of To-Morrow. Second Edition. Page 15 (CD – A2)

front doors.

7.5.63. The relationship and interaction with the street are considered to be a clear enhancement over that of the current appeal site, with the Appeal Scheme offering an engaging streetscape with active frontage to residential properties, which have a fine grain provided by the fenestration providing a strong sense of human scale. This is in contrast to the featureless monolithic cliff face of the elevation of the BioPark building which lacks definition and is of poor townscape quality, as previously discussed.

7.5.64. Further to this, the Appeal Scheme would not intrude on the agricultural land which encloses the Garden City, thereby maintaining its authenticity and integrity. Instead, the proposals are in direct accordance with Howard's principle on growth and development, which asserts that *'growth shall not lessen or destroy, but ever add to its social opportunities, to its beauty, to its convenience'*.⁵

7.5.65. As such, it is asserted that the Appeal Scheme does comply with the NDG's criteria for 'Context' and 'Identity', contrary to the assertions of The Welwyn Garden City Society ('WGC Society'), states in Para 40 of their SoC (CD – I1) and to John Boyd's assertion a 6.52 of his representation that (CD – E1):

7.5.66. *"the appeal proposal would not respond positively to its surroundings or relate well to them. As such they would fail to respect the original Garden City principles and historic legacy as recommended by the National Design Guide..."*

7.5.67. The Draft Local Plan (2016) (CD – B3) Policy SP9: "Place Making and High-Quality Design" in relation to the treatment of taller buildings which is worded in the following way:

7.5.68. *"In addition to other design principles and criteria set out within the Local Plan, proposals for taller buildings should positively respond to the following matters within their design solution:*

Long distance views.

Impact on skyline, townscape, historic assets and landscape.

⁵ Howard, E. (1902). Garden Cities of To-Morrow. Second Edition. Page 93.

Relationship and interaction with the street and human scale.”

7.5.69. It is considered that, for the reasons set out above regarding impact, in the choice of views and viewpoints, (which were agreed initially by Place Services, and have been further agreed by the Council in their Townscape SoCG, Para 14) (CD – D3), the Appeal Scheme thus complies with this policy on design quality.

7.5.70. The third point of Policy SP9 of the Draft Local Plan (CD – B3), regarding relationship and interaction with the street and human scale echoes a criticism of the current Appeal Site in the Broadwater Road West SPD (2008) (CD – B4), which decries the lack of integration of the current Appeal Site with the surrounding area. This lack of integration is symptomatic of the area being located within the former industrial park which has been subject to a substantial decrease in its original activity over the past few decades, resulting in an area of poorly defined character and activity. The proposals for the Appeal Site, together with the approved proposals for the Shredded Wheat Quarter will enliven this area with activity and integrate the land to the east of the railway line with Welwyn town centre.

7.5.71. The Appeal Scheme has sought to consolidate the aesthetic and historic identity of the surrounding area, taking cues from the varied character around the Appeal Site. In particular, the proposals have sought to retain the sense of industrial character through appropriate scale, massing and design, thus in accordance with the ‘Identity’ NDG Characteristic (CD – A2).

7.5.72. Therefore, the Appeal Scheme clearly accords with the established and emerging character and appearance of the area, would not cause a detrimental impact and would be wholly appropriate for this site and is in accordance with the key aspects of the NDG (‘Context and Identity’) (CD – A2) which correspond to RfR3b (CD – C26).

8. CONCLUSION

8.1.1. This PoE has considered the salient issues in the Council's RfR3b (CD – C26) and the objections and criticisms of Rule of 6 Parties and other respondents. I have considered these against the relevant and applicable tenets of the NDG (CD – A2) as well as local policies and with regard to the NPPF (CD – A1) and found them untenable.

8.1.2. I believe that the Appeal Scheme offers a considerable enhancement in relation to the existing buildings on the Appeal Site offering an improvement to the character and context of the area.

8.1.3. Furthermore, I consider the LPA's own PCR (CD – C24) to make statements to the contrary of RfR3b (CD – C26), clearly demonstrating that the RfR is unfounded and lacks credibility.

8.1.4. Overall, I consider the Appeal Scheme to be an appropriate response to its context that will have a positive impact on the Welwyn area and views from the Welwyn Garden City Conservation Area.

8.1.5. I therefore respectfully recommend that this scheme is allowed at appeal.

9. EXPERT DECLARATION

9.1.1.I, Stephen Levrant, understand that my duty is to help the Inspector on matters within my expertise and that this duty overrides any obligation to the Respondent from whom I have received instructions and by whom I am paid, and I have complied with this duty.

9.1.2.I believe that the facts stated in this report are true and that the opinions expressed are correct.



Signed.....

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Stephen Levrant RIBA, AA Dip, FRSA, Dip Cons (AA), IHBC, ACArch

Dated 13th June 2022