

Review of the Appellants Heritage and Townscape Visual Impact Assessment (Appendix 6 of the appellants Statement of Case)

Produced by Rule 6 Parties WGC Heritage Trust and Keep the G in WGC

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1. Introduction

- 1.1 The Heritage and Townscape Visual Impact Assessment (HTVIA) forms the basis of the Appellant's argument that the proposed scheme has no impact on the heritage, townscape and context of WGC and that in fact it will improve the character and context of the existing area.
- 1.2 Having reviewed the HTVIA, it is clear that the justifications for these conclusions are founded entirely on a superficial assessment of the design of the proposed scheme. The grounds for this conclusion are highly contested and indeed it becomes apparent that the opposite conclusion should be reached.
- 1.3 Welwyn Garden City (WGC) is the second of the two garden cities created on the principles founded by Ebenezer Howard. As such it has a unique status on the national and international stage. As has been argued elsewhere in our submission and in the body of this review, the heritage value of the town rests not in individual heritage buildings, but in the totality of the town, its townscape, layout, planning, landscaping and vistas. Howard's vision was translated by Louis de Soissons, elegantly bringing together these elements to make up the character and setting of WGC. Together these elements are the heritage of the town.
- 1.4 The marrying together of the complex set of factors that have been deliberately and thoughtfully brought together by its founders and Chief Planner – the townscape, buildings, landscape, and public spaces - generate the highly valued and distinctive sense of place that pervades the town. None of these factors are experienced in isolation but through a continually reinforcing relationship between the town and its inhabitants.
- 1.5 The town's heritage and underlying sense of place is fragile and can easily be subsumed and overwhelmed by interventions that are not fully rooted in the original principles and ethos of the garden city movement. It is argued that the proposed scheme does not demonstrate how its design and appropriateness responds to the garden city principles or the key characteristics of a garden city, which runs counter to Local Plan policy SP15. This is further confirmed by the TCPA in their letter of 9th June (Appendix 5) ¹

2. Methodology Used

- 2.1 Section 2 outlines the methodology and the steps involved in evaluating heritage value.
- 2.2 Paras 27-31 describe several criteria that can be used to assess the significance of the heritage asset. This section concludes that there is *'no one set of criteria provided in Historic England documentation which provides guidance for the different grading of heritage assets in significance assessments'* (30).

¹ Appendix 5 of Proof of Evidence of WGC Heritage Trust and Keep the G in WGC - TCPA Letter dated 9th June

- 2.3 As the consultants have devised criteria for evaluating the heritage significance and value of the townscape, it would be important to have this criteria and associated value judgements independently reviewed. The consultants have also made a judgement on the architectural quality of the appeal scheme and its impact on the heritage elements within its vicinity. Again, this is based on value judgements, which are not sufficiently robust and can be contested. No objective criteria for evaluating the design of the scheme against the key garden city principles has been devised or applied.
- 2.4 Section 2.5 sets out the visual impact assessment methodology. The report notes that this was created to assess natural landscapes and not urban townscapes. Therefore, further guidance is used from Historic England. The report cites two components of the visual impact assessment (TVIA):
1. Assessment of townscape effects: assessing effect on the townscape as resource in its own right
 2. Assessment of visual effects: assessing effects on specific views and on the general visual amenity experienced by people.
- 2.5 Para 34 includes the caveat that whilst the assessment has been informed by a series of criteria, *'it is important to note that these criteria are intended as a guide to inform professional judgement'*.

3. Townscape Character Assessment (TCA)

- 3.1 Section 2.51 sets out the criteria for the Townscape Character Assessment (TCA). This is based on the identification of a number of geographical areas defined by the consultants as having identifiable characteristics in common. The resulting Townscape Character Areas (TCA's) have been mapped with boundaries. A diagram is included in Section 7 page 35. These break up the WGC Conservation Area (CA) into several smaller components.
- 3.2 This misses the point that WGC was the first town to be designed as a whole by de Soissons, and all of its parts matter to the whole. Fragmenting the CA into smaller pieces has the potential to undermine the whole and the overall significance and value of the CA as recognised within planning law.
- 3.3 Para 41 references 'viewers' as the general public affected by development. It goes on to assert that, *'people are generally more sensitive to change in areas where they live and are more sensitive to change which affects ...parks and open spaces... rather than streets ...'* In a town such as WGC this may not be strictly applicable as the whole town and the CA in particular, is held in high esteem by its residents and the impact on its townscape is of significant concern to the public. This is evidenced by Appendix 8, Voice of the Community ²
- 3.4 In para 42, Table 1a, (should be Table 2a) the consultants have accorded a **value** to three sets of criteria they have defined to describe the different TCA's. A **medium** value is accorded to:
- '...areas of local or regional importance with intact character such as Grade II and Grade II listed buildings... Conservation AreasA medium value may also equate to locally valued townscapes, conservation areas that contribute significantly to its historic character ...'*

² Appendix 8 of Proof of Evidence: Voice of the Community, Keep the G in WGC and WGC Heritage Trust

3.5 The report goes on to set out each of the TCA's **susceptibility to change**. The report states that the value and susceptibility to change is combined to judge the sensitivity of each TCA. However, para 45 suggests that a high level of judgment is involved,

'The assessment of the sensitivity of the receptor under consideration may be moderated to take into account a judgement about its quality, relative importance and significance.... Conservation areas include within them areas of greater and lesser quality; and so on. Thus, there is not necessarily a direct link between the different categories of heritage assets and their relative importance, and the assessment of sensitivity as high, medium or low. Table 2a outlines general criteria to inform judgement on townscape sensitivity'.

3.6 Table 2b describes as **high**, townscapes with distinctive components and characteristics, often including designated townscapes and/or designated heritage assets; susceptible to small changes of the type of development proposed.

3.7 It describes as **medium**, townscapes with local value, of relatively common components and characteristics and may include heritage assets such as conservation areas...; reasonably tolerant of changes of the type of development proposed.

3.8 It is argued that WGC is recognised as having significant national as well as regional and local heritage value (see Appendices 7, 6a and 6d)³, based not only on its individual components, but the planning, layout and setting of the townscape as a whole. We therefore would not agree with the judgement reached by the consultants that it is '*reasonably tolerant of changes of the type of development proposed*'. WGC CA does not therefore sit easily within the susceptibility value of **medium** as described.

4. Historic Context – Character of WGC

4.1 Section 3 describes the historic context and character of WGC. This dwells primarily on the limited number of listed buildings in the WGC CA and around the appeal site. This section fails to set out the recognised heritage value of the WGC CA as a whole and the standing of WGC on the national and international scene.

4.2 Para 74 quotes from English Garden Cities – An Introduction (English Heritage 2020).⁴

'It is noted by English Heritage that, "All of the communities discussed in this book have some listed buildings: some have many...by contrast, only a few buildings from the garden city era at Welwyn Garden City are listed...the conservation area at Welwyn Garden City is confined to the west of the railway, perhaps reinforcing the longstanding impression that the east was the wrong side of the track'.

4.3 This quote has been conflated, which brings into question the objectivity of the consultants. The first part, '*All of the communities are listed*' appears on page 91 of the English Heritage (EH) report. In relation to this, on page 92 the EH report goes on to state:

'Considering the generality of much of the housing in WGC .. [it] raises the question as to whether comprehensive listing would be an appropriate way of preserving their distinctive garden city character, as much of this lies in the relationship between buildings, the road layout and the incorporation of green spaces and natural features'.

³ Appendix 7 of PoE - TCPA application for World Heritage Status, 6a and 6d, statements from Prof Eugenie Birch and Dr Heleni Porfyriou

⁴ English Garden Cities – An Introduction (English Heritage 2020)

- 4.3 The rest of the quote *'The conservation area ...the wrong side of the tracks'* is on page 92/93 and is made in reference to some of the issues that boundaries to CA's can give rise to.
- 4.4 The EH report states that conservation areas are identified *'.. 'for their special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance''They help to protect ... garden cities'*
- 4.5 The focus on listed buildings suggests a fundamental lack of understanding of the principles on which WGC was founded. The towns planner Louis de Soissons⁵, designed the town so that the dominant element was the trees and landscaping, which he used to unify the intimate informal housing areas and the grand formal central Parkway axis, which the EH report describes as *'one of the finest 20th century townscapes'*. This is further reinforced by Appendix 3.⁶
- 4.6 It is also the case that two further CAs have been designated in WGC over more recent years, where the architectural style and generous landscaping repeated that in the west side CA. The fact these were accepted for designation point towards the values and qualities of the original CA as having stood the test of time.
- 4.7 The churches in Parkway do not have high towers or spires and were never intended to be grand buildings because all religions were seen as equal therefore, no one church should dominate. The height in the town centre scheme comes from trees, tall Lombardy poplars, not its buildings.
- 4.8 Furthermore, the town was always intended to attract middle- and working-class families. The housing was designed to be attractive and well built, but not too large or expensive for people to afford to rent or buy. de Soissons had a flair for developing plan types which could be used repetitively yet interestingly, for example by varying the position of front doors, and using different porches and garage links. Design costs had to be kept to a minimal while creating environments of a good quality in remarkable variety. With comparatively small houses, again it is the trees which form the dominant note. Great care was given to their choice and positioning so that no road has the same combination of varieties. In one of the few cases in the town where the houses are the main feature, the junction of Knightsfield and Digswell Road, de Soissons's design is grade 2 listed.
- 4.9 Therefore, it is by design rather than any architectural failing that the CA does not contain as many listed buildings.
- 4.10 Para 82 refers to the 'urgent' need for redevelopment of the Broadwater Road area, set out by EH in their report. The EH report recognises that regeneration could act as a stimulus, but it goes on to state that,

'Although outside the conservation area, this land is within the original garden city as it was conceived in 1920, and recognition of this in both the form and use of the site will require constructive engagement of all parties'.

- 4.10 The EH report sets out the origins of Letchworth and Welwyn Garden Cities and Hamstead Garden Suburbs and the significance of the movement. In the Foreword Baroness Andrews (Chair of EH) states:

'Garden City settlements are therefore important: they have inspired special qualities beyond the picturesque, with high standards of design in architecture and landscaping. However,

⁵ The architect Louis de Soissons was appointed by Ebenezer Howard to plan Welwyn Garden City (including the Shredded Wheat factory)

⁶ Appendix 3 of the PoE, Green and Amenity Spaces in Welwyn Garden City – Keep the G in WGC and WGC HT

they are fragile environments. Some are over 100 years old. Of course, they served a lifestyle very different from that of today. Adaptation to increased pressure for change ... can tip the balance to the point at which the manifest reasons why garden cities have proved so popular are seriously endangered. This would be in no-one's interest. Garden Cities must adapt to survive, but we must seek solutions which allow them to evolve while at the same time retaining their character.'

4.11 The report goes on to state:

'It [WGC] was the conduit through which Howard's garden city ideas flowed into the post war era of reconstruction, of which WGC itself became a significant part'.

4.12 In its conclusion the report acknowledges that not all garden city settlements have national or local designations, but this does not mean they are lacking value, and *'the fact that ... they remain highly desirable places to live demonstrates they are still widely recognised as having qualities not present in other sorts of urban environment'.*

5. Appeal Site – Background and Significance

5.1 The recognition of the misconceptions of Bidwell's HTVIA in para 85-86 highlights the limited level of understanding there has been of the area.

5.2 The Appeal HTVIA recognises the design quality of the 1977 Roche office building as, *'the most responsive in its design and has the most integrity in its architectural character'.*

5.3 Para 99 refers to the existing Bio park building as *'unremarkable and generic'* and states that the *'other detracting features include the highly-reflective glazing on the northern sections which appear quite outdated and degenerated'.*

5.4 The existing industrial building, designed for Roche by Cubitt, Atkinson and Partners, was built to serve a specific function and there are elements of the structure which suggest that some care was taken in its design and construction. However, a judgement on its current appearance is not sufficient justification for replacing it with something which itself has no architectural merit.

5.5 Para 101 goes on to state: *'Now that commercial and production operations have ceased and that the surrounding context has become residential in typology, the commercial monolith is anomalous in its surroundings'.* The report concludes that therefore the site has no significant architectural merit.

6. The Appeal Scheme

Section 5 offers a glowing review of the proposed scheme. This assessment is not based on any objective evaluation of the scheme, using objective values or garden city principles. Indeed, this view is highly contested as confirmed by contributions from Professor Graham Morrison OBE (Appendix 6b) and by architects EcoResponsive Environments (Appendix 6b) who won the RIBA award, Re-imagining Garden Cities.⁷ The scheme makes no mention of the "clumsy site layout" which has no relationship to Howard's garden city principles. It is neither a formal layout, as we see in the town centre, nor an informal layout that we see in the residential areas surrounding the town centre.

6.2 Figure 15 of this section provides an aerial CGI of the proposed scheme. Despite the assertion that: *'the appeal scheme fits comfortably within the context of residential buildings'*; Fig 15 helps to illustrate the incongruity of the scheme in terms of its height,

⁷ Appendix 6b and 6e of the PoE – Prof Graham Morrison OBE and EcoResponsive Environments, winners of the RIBA Re-imagining Garden Cities Award (2019).

materiality and bulk and highlights its lack of relationship with the residential area. The nine storey blocks dominate, failing to respect or relate to the character and context of the surrounding residential properties. The mansards attempt to replicate the mansard roofs to some of the buildings in the town centre commercial/ retail buildings but the proposed mansards at more than two storeys high on top of the high rise apartment blocks would be out of scale, top heavy and over-bearing architecturally and not of a residential or human scale.

6.3 The report claims that,

'The fine urban grain found in the residential buildings in the area is carried across the site with features such as fenestration and balconies, finely detailed and providing the appeal scheme with a sense of human scale.' The urban grain for the residential blocks adjacent to the site is far from fine but it is formal and rectilinear rather than an informal layout e.g. a marriage of town and country" promoted by Howards Garden City principles. However, the adjacent residential blocks work at one level due to their lower scale whereas the scale of proposed development makes the blocks more reminiscent of Corbusian and brutalist master planning.

6.4 It is hard to imagine how the introduction of balconies can engender a sense of human scale in and around closely packed nine storey high slabs of tower blocks. These balconies are also not an integral part of the design but "bolt on" features, almost as if they are an afterthought to increase amenity space which cannot be provided due to the over dense layout.

6.5 The consultants further claim,

'The clay tile mansard roofs honour the prevailing form in Welwyn Garden City more generally, and in this way the appeal scheme acts as a mediator between the more boxy, flat-roofed residential buildings to the east on Penn Way, and the mansard and sliding roof typology found in the 20th century buildings around Welwyn Garden City.'

6.6 It is not clear how taking a human scale mansard roof as we see in the town centre, doubling its size and adding it on top of a high rise development can mediate between two different styles of building, especially as it is proposed in such a clumsy manner. This is a highly superficial evaluation of the scheme and does not offer a deeper demonstration of its alignment with garden city principles or the context and character of WGC. It also highlights that the scheme is neither one thing nor the other, but an uneasy "mash up" of two distinct architectural styles. Penn Way (part of the Mirage development) reflects the modernist style and the mansard roofs are part of the neo-Georgian style of some parts of the original WGC townscape. Combining two distinct styles, makes the design of the proposed scheme highly incongruous and lacking in architectural integrity or clarity. In fact, mansard roofs in WGC are limited to one small area and are not typical, therefore quoting them as justification for the design chosen is misleading and lacking in architectural merit.

6.7 Referring to the existing building para 151 of the report states.

'...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.'

6.8 Para 101 also refers to the existing industrial building as a 'commercial monolith'. Figure 15 shows that the new proposals will occupy a much larger part of the site, with a similar height and greater overall bulk. The proposed scheme will therefore replace one 'monolith' with another more overbearing one (also see section 7 below). The existing building is at least

architecturally clear about what it is, e.g. an industrial structure in what was a former industrial/ employment zone as part of the garden city. Using the argument that the former building was unattractive seems to be suggesting that this justifies the “proposed monolith” hardly a convincing argument for the design. It is almost as if the architectural argument is that the proposed scheme is not as bad as the building it replaces rather than it is a development of architectural merit in its own right.

- 6.9 In conclusion the assessment offered in the HTVIA of the design quality of the scheme is highly superficial and not based on any objective or deeper evaluation of the scheme against the garden city principles or the context and setting of the WGC CA and the adjacent Mirage development. The evidence offered as part of this Rule 6 party proof of evidence contradict the assertions of the HTVIA relating to the appropriateness and design of the scheme. The design does not acknowledge or refer to the garden city aesthetic in its, layout, scale, form or materiality. It is clumsily detailed and is not worthy of the site it occupies so close to the town centre.

7. Heritage Assessment

- 7.1 Section 5.1 Figures 16, 17 and 18 help to illustrate the proximity of the appeal site to the WGC CA and the extent of the CA that falls within a 500-meter radius. As discussed above, the fact that individual buildings have not yet been listed should not be a significant factor in acknowledging the heritage value of the CA and its wider setting.

- 7.2 Para 122 acknowledges,

‘The Welwyn Garden City Conservation Area does fall within the setting and there is direct intervisibility – whilst it incorporates buildings of a quite different character and function, there are intrinsic historic links as the industrial quarter of the town was part of Ebenezer Howard’s original vision and this can be said to contribute to the setting of the heritage asset.’

- 7.3 Section 6.6 sets out the significance of WGC conservation area. Paras 147/48 assert that,

‘Whilst Welwyn Garden City 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’

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’.

- 7.4 As has been argued above, the limited number of listed buildings does not reflect on the significance and value of the CA. The heritage value of WGC lies in its overall character and setting. As stated in the EH report, the heritage value of WGC lies not in the individual buildings, but ‘... *in the relationship between buildings, the road layout and the incorporation of green spaces and natural features’.*

- 7.5 The EH report describes the ranking of WGC in the hierarchy of garden cities as:

‘Its [WGC] plans and development perhaps most fully represent Howard’s concept of functional zoning and the ideal of the city, which ... provides a full range of facilities in a rationally planned environment. Landscaping is a highlight ... the residential areas combine architectural finesse with a verdant setting’.

7.6 In para 148 the HTVIA eventually acknowledges that *'there is higher quality in the conservation area as a sum of its parts, than if the parts were individually recognised'* and a value of **medium** architectural interest is accorded.

7.7 Para 149 acknowledges:

*'Historic interest: as has been examined in Section 3 of this report, Welwyn Garden City was part of an important 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. **Historic interest is high.**'*

7.8 Para 150 states, *'The heritage asset is considered to be overall of **Good significance**'*.

7.9 Para 151 makes an assessment of the impact of the appeal site on the significance of and setting of WGC CA. It states:

'The appeal site has 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 unpleasant beacon visible from some distance in places. In some areas the upper floors of the monolithic block are visible too. 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. The current impact of the appeal site on the heritage asset is negative'.

7.10 Despite the acknowledgement that the site has numerous points of intervisibility with the CA, the report suggests it is at too great a distance to 'loom' over the CA. The reality is that site is on the boundary of the CA and although the railway is a dividing line, the topology of the area means the Bio Park building appears in close proximity and can be described as a looming feature from within the CA. At the same time, the report accepts the visual impact of the site, saying that the existing building is:

'...an unpleasant beacon, visible from some distance in places. In some areas the upper floors of the monolithic block are visible too'. It acknowledges the building has a negative impact on the CA setting due to its 'bulk and unattractive form'.

7.11 The boundary of the CA does not immunise it from the negative impacts of development within Broadwater Road. In the same way as the existing building is accepted as having a negative impact due to its height, bulk and appearance, any replacement structure will have the same impact unless there is a careful consideration of its design, height, bulk and scale.

7.12 Para 153 makes the assertion that,

'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'

7.13 This statement is contradicted by the HTVIA in an earlier statement in Para 122:

'The Welwyn Garden City Conservation Area does fall within the setting and there is direct intervisibility – whilst it incorporates buildings of a quite different character and function, there are intrinsic historic links as the industrial quarter of the town was part of Ebenezer Howard's original vision and this can be said to contribute to the setting of the heritage asset.'

7.14 As has been set out in our Proof of Evidence, the Broadwater Road site should not be viewed as a single generic area, where high rise and high-density development can be automatically assumed. The typology referred to is within the footprint of the Shredded Wheat factory site. The appeal site should relate to development immediately in its vicinity which is the Mirage site and existing residential settlements.

7.15 The Mirage site is a good example of recent modern development, which adheres to the principles of relative low heights and integrated green spaces and play areas. Furthermore, Broadwater Road is not 'separate' or 'less significant', as has been acknowledged by the HTVIA itself. The industrial area was as carefully designed and planned forming a part of the garden city ideal and integral to Howard's pioneering land-use zoning. The EH report state that, *'Industry developed quickly during the 1920s and produced some exceptional buildings expressing the modern nature of industries attracted to the new city'*. The EH report goes on to confirm that, *'Although outside the conservation area, this land is within the original garden city as it was conceived in 1920,..'*

7.16 Section 6.13 sets out the appeal scheme proposals. Para 191 states,

'The present BioPark building is more noticeable than the appeal scheme would be, due to its height and material character – reflective white render metallic surfaces (especially at roof level) and brown glazing, as well as the paraphernalia that has accumulated at roof level such as grills, louvres and aerials. The appeal scheme would introduce a material character which melds well with the existing residential houses already visible on either side of the railway. The appeal scheme has a combination of elevational treatments, including red brick and red clay tile roofs which combine well with the local vernacular style'.

7.17 The everyday experience of local residents of the existing building is that due to its white and reflective façade, it blends into the background reflecting the sky, clouds and surrounding greenery. It is a single relatively streamlined structure and as an industrial building, it is not lit up after dark and there is no sense of overlooking. The appeal scheme would have the opposite effect, with bulky and busy facades with multiple finishes. The height and overall increased scale will mean this whole area will be lit after dark, creating a beacon effect, with the balconies giving a sense of overlooking. The proposed scheme will therefore be far more noticeable. The site offers the opportunity to develop a scheme which radically improves the views and impacts on the CA area and its setting, which the current proposals fail to do.

8.0 Summary of Impact on Welwyn Garden City Conservation Area

8.1 Para 203 makes the following conclusion:

'The appeal scheme will represent an enhancement in relation to current appearance of the appeal site. This is as a result of the appeal scheme reducing the overall amount of built form at the tallest height (approximately 30m) so that it will be less visible from the Welwyn Garden City Conservation Area. What smaller degree of built form will be visible will be much more appropriate and responsive to the character of the conservation area, with red tiled mansard roofs offering a much more sympathetic and subtle backdrop to the buildings in the conservation area, and replacing the unpleasant and intrusive roof form of the current BioPark building in numerous views. In a broader sense, the impact on setting will restore

*some vitality to the appeal site, which has been vacant for some time. This, and improved amenity space, will have a positive effect on the wider setting of the conservation area. The impact is considered to be **minor beneficial**, thus constituting **no harm and sustaining and enhancing the special character of the conservation area**.*

- 8.1 Having accepted that the WGC CA *'does fall within the setting and there is direct intervisibilityand there are intrinsic historic links as the industrial quarter of the town was part of Ebenezer Howard's original vision and this can be said to contribute to the setting of the heritage asset.'*; and having accepted that the CA is of medium architectural interest, high historic interest and having judged the overall heritage asset as of Good significance, the report concludes that the proposed scheme is considered to be minor beneficial and will constitute no harm but will in fact enhance the special character of the conservation area.
- 8.2 This conclusion is based on the superficial evaluation of the architectural merits of the scheme which are keenly disputed. The mash up of styles means that the tower blocks will hardly present a more 'sympathetic and subtle backdrop to the buildings in the CA'. It has also been effectively argued in our Proof of Evidence, that the proposed scheme represents an increase in the overall amount of built form, introducing a far larger mass and bulk.
- 8.3 The suggestion that the restoration of some vitality to the appeal site is a factor in the assessment is spurious. The amenity space within the appeal site will not have any direct added benefits for the wider setting of the CA. This is further illustrated by Appendix 3, Green and Amenity Spaces in WGC⁸

9. Part 3: Townscape and Visual Impact Assessment - Characterisation Appraisal

- 9.1 It is not clear whether the townscape character area defined as (I) has been evaluated. Para 211 suggests this should be done and combined with character area D, which includes the highly significant setting of Parkway and the central areas of WGC CA.
- 9.2 Para 217 states that, *'Bidwells HTVIA concludes that TCA D is of moderate townscape value, as the area reflects the commercial centre of Welwyn well, expressed in the formal geometry of the streetscapes'* The HTVIA concludes that the receptors of this area are of **medium value**.
- 9.3 This seems completely contrary to the widely acknowledged recognition of the significance of Parkway, described in the EH report as *'Louis de Soissons balanced the formation of the town centre with the sweeping Parkway axis (one of the finest examples 20th Century townscapes) and intimate housing areas'*
- 9.4 With regard to TCA J, Longcroft Lane, which is also in the CA, para 225 states that, *'Bidwells HTVIA concludes that TCA J is of 'moderate' townscape value. The report further identifies the current building at the appeal site to make a negative contribution to the character of the Longcroft Lane Character Area'*. The report concludes that the receptors of the area are of **medium-low value**.
- 9.5 Para 224 states,
- 'The appeal site is sporadically glimpsed into views looking east from Longcroft Lane, visually and physically segregated from the residential community by the railway line; the appeal site is understood as a building of greater mass and scale in the distance'*.
- 9.6 As already stated above, the separation of the appeal site by the railway line is misleading and does not mean it is visually segregated. The report also does not recognise that the

⁸ Appendix 3 Green and Amenity Spaces in WGC, Keep the G in WGC and WGC Heritage Trust

appeal site is highly visible from the back gardens of many homes in Longcroft Lane. The replacement of the existing building with a development of the height, bulk and scale proposed will have a significant adverse visual impact in this area.

- 9.7 Para 227 concludes that the scheme will be of negligible minor benefit within TCA J. This is a highly contested assertion, based on a superficial assessment of the scheme design. The proposed scheme will create a far greater visual impact on the skyline.
- 9.8 There are value judgements made in terms of the receptor value accorded to these and other areas within the report. As set out in this review, there is a high degree of sensitivity to changes to the historic setting of WGC and this has not been reflected in the assessments. In Table 3a the criteria for assessing sensitivity, acknowledges that sensitivity is high, within 'communities where views contribute to the townscape setting enjoyed by residents'.
- 9.9 In para 53 the report acknowledges that, 'the proposals may be visible from some locations beyond those that have been selected'. It goes on to make the following caveat in para 63.

'The AVR's are two-dimensional and cannot fully capture the complexity of the real visual experience. They form an indication of the true three-dimensional visual experience. Neither to the AVR's capture transient significant effects arising from noise or traffic...A site visit to the location from which the photographs were taken is strongly encouraged to better appreciate and understand the visual impacts.'

10. Conclusion

- 10.1 The HTVIA finds that the WGC CA is of significant heritage value. It also accepts that there is intervisibility with the appeal site and that there are intrinsic historic links as the industrial quarter of the town was part of Ebenezer Howard's original vision.
- 10.2 However, it fails to establish that the proposed development respects or in in keeping with the character and setting of heritage assets in terms of design, scale, materials and impact on views. Furthermore, the negative impact on the sense of place of WGC, of the scheme has been overlooked.
- 10.3 The HTVIA makes the assertion that the existing industrial building makes a negative contribution to the setting of heritage assets in WGC including the CA. The reasons given for this negative contribution - its height, bulk and appearance – also apply to the proposed development. It is not enough to make the argument that the proposed scheme is less bad than the building it replaces.
- 10.4 The HTVIA concludes that the proposed development will result in an enhancement to the setting of WGC CA. This is based on a superficial assessment of the design of the proposed development, which is contested and is not based on an objective and deeper assessment of the scheme against the garden city principles and ethos.
- 10.5 The opportunity should be taken to radically improve the views and setting of this part of Broadwater Road, through a scheme that is in keeping with the surrounds and delivers an extension of the principles and ethos on which WGC was founded, creating beautiful buildings and places that the people of WGC can enjoy and celebrate for generations to come.