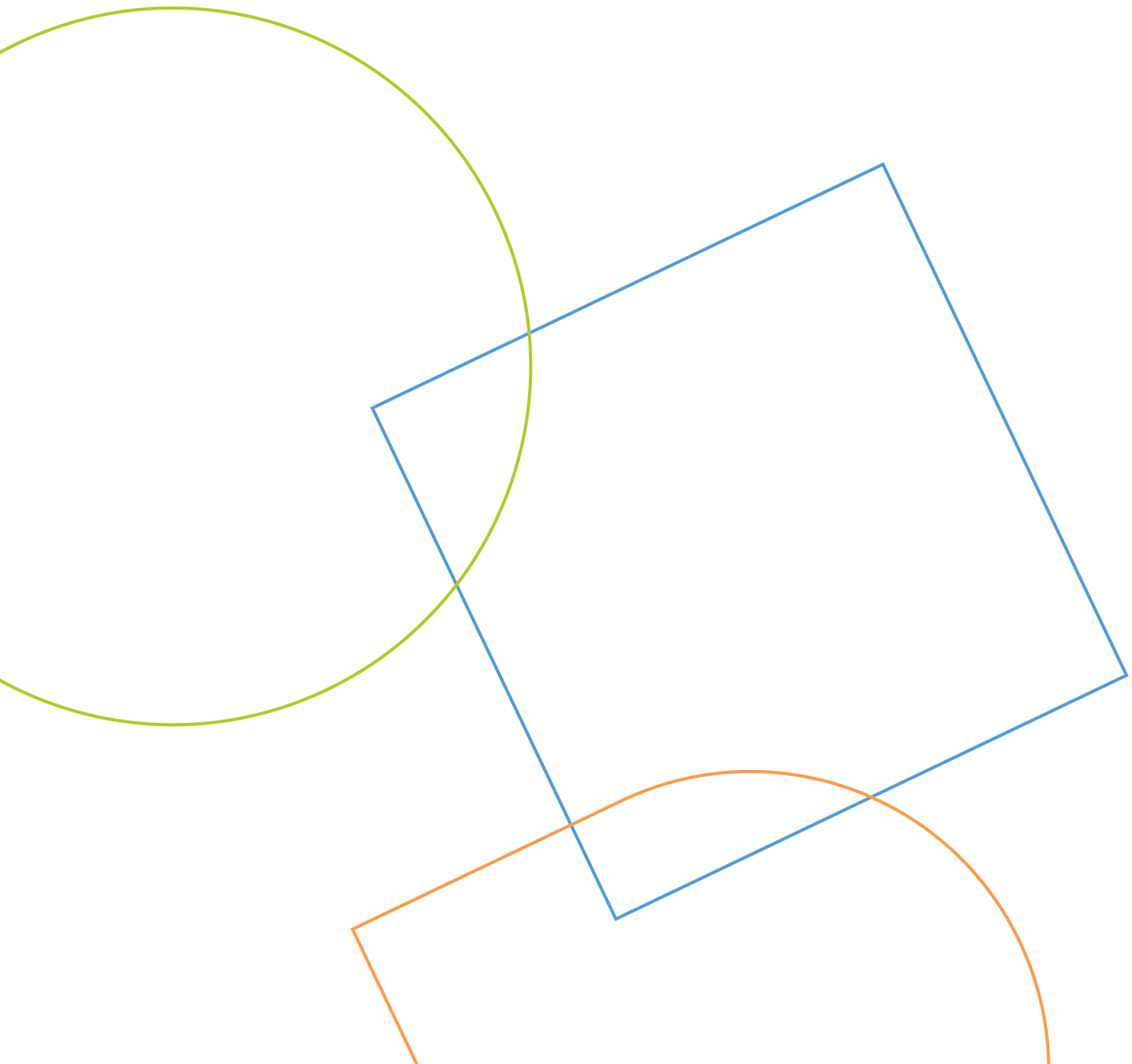


Environmental Impact Assessment Screening Report

Letchworth Garden Square

October 2026



Site Address: Garden Square Shopping Centre, Letchworth Garden City, SG6 3DP

Project Number: 7254

Client's Name: Regent Street Projects Ltd

October 2026

London
120 Moorgate
EC2M 6UR

Contents

1	INTRODUCTION	1
1.1	REQUEST FOR EIA SCREENING OPINION	1
2	SITE LOCATION AND DESCRIPTION	3
3	PROPOSED DEVELOPMENT	8
3.1	INTRODUCTION	8
3.2	POLICY CONTEXT	9
4	ENVIRONMENTAL IMPACT ASSESSMENT SCREENING CONTEXT	10
5	ENVIRONMENTAL CONSIDERATIONS	12
5.1	INTRODUCTION	12
5.2	TRAFFIC AND TRANSPORT	12
5.3	AIR QUALITY	13
5.4	NOISE AND VIBRATION	14
5.5	CLIMATE CHANGE AND ADAPTION	15
5.6	SOCIO-ECONOMICS AND HUMAN HEALTH	16
5.7	ECOLOGY	17
5.8	GROUND CONDITIONS	18
5.9	WATER RESOURCES, FLOOD RISK AND DRAINAGE	18
5.10	HERITAGE, TOWNSCAPE, AND VISUAL IMPACTS	19
5.11	WASTE MANAGEMENT	21
5.12	DAYLIGHT, SUNLIGHT AND OVERSHADOWING	22
5.13	WIND MICROCLIMATE	22
5.14	MAJOR ACCIDENTS AND DISASTERS	23
5.15	CUMULATIVE EFFECTS WITH OTHER DEVELOPMENTS	23
6	CONCLUSION	28

1 Introduction

1.1 Request for EIA Screening Opinion

1.1.1 This Environmental Impact Assessment (EIA) Screening Report has been prepared by Lanpro on behalf of Regent Street Projects Ltd (hereafter referred to as the ‘Applicant’).

1.1.2 The Applicant intends to submit a full planning application to North Herts Council (NHC) under the Town and Country Planning Act 1990 (as amended) for the demolition of the existing buildings and delivery of up to 240 residential dwellings (Use Class C3) and Class E floorspace (predominantly in retail and food and beverage uses) (the Proposed Development) on Land occupying Garden Square Shopping Centre, Letchworth Garden City, SG6 3DP (the Site).

1.1.3 On behalf of the Applicant, we write to request an EIA Screening Opinion from NHC in accordance with Regulation 6(1) of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017¹ (as amended²) (the ‘EIA Regulations’).

1.1.4 The purpose of this report is to provide relevant information to inform an EIA Screening Opinion under Regulation 6(2) of the EIA Regulations. To assist NHC in its adoption of a Screening Opinion, we enclose an EIA Screening Appraisal to satisfy Regulation 6(2) by providing the following:

- A plan sufficient to identify the land (provided in **Figure 1 and 2**);
- A description of the location of the Proposed Development, with particular regard to the environmental sensitivity of geographical areas likely to be affected (provided in Section 2);
- A description of the Proposed Development, in particular the physical characteristics of the development and demolition and construction works (provided in Section 3);
- A description of the aspects of the environment likely to be significantly affected by the Proposed Development (provided in Section 4);
- A description of the likely significant effects of the Proposed Development on the environment resulting from expected residues and emissions and the production of waste, where relevant; and the use of natural resources, in particular soil, land, water and biodiversity (see Section 5); and

¹ Her Majesty’s Stationary Office (HMSO), 2017. The Town and Country Planning (Environmental Impact Assessment) Regulations 2017. SI 2017/571. May 2017. Available at: <https://www.legislation.gov.uk/uksi/2017/571>

² HMSO, 2018. The Town and Country Planning and Infrastructure Planning (Environmental Impact Assessment) (Amendment) Regulations 2018. S.I. 2018/695. November 2018. Available at: <https://www.legislation.gov.uk/uksi/2018/695>

- Any other information or representations provided, including any measures envisaged to avoid or prevent any significant adverse effects on the environment (provided in Section 5).

1.1.5 Schedule 3 of the EIA Regulations sets out selection criteria that should be considered, including the characteristics of the Proposed Development, its location, the type and characteristics of the potential impacts and the possibility of effectively reducing the impact. This report provides an appraisal of the Proposed Development with reference to these criteria.

2 Site Location and Description

- 2.1.1 The Site comprises Garden Square Shopping Centre and associated road access on Rowland Way. It extends to approximately 1.54 hectares (ha) and is centred at National Grid Reference TL 21838 32581. Garden Square Shopping Centre is currently in commercial and retail use, enclosed by retail stores, residential dwellings and street furniture. The Site is located south of Letchworth Garden City Railway Station and centred between Gernon Road, Leys Avenue and Eastcheap.
- 2.1.2 The location of the Site is shown on **Figure 1**. An indicative red line boundary is shown in **Figure 2**. **Figure 3** spatially illustrates the environmental designations and sensitivities in proximity of the Site.
- 2.1.3 The Site is not considered to be located within a ‘Sensitive Area’ as set out in Schedule 3 of the EIA Regulations. The Site is not located within any statutorily designated ecological, geological or landscape areas such as a site of Special Scientific Interest (SSSI), Special Protection Area (SPA), Special Area of Conservation (SAC) or National Landscapes (previously known as Area of Outstanding Natural Beauty (AONB)). The Site is also not within an Air Quality Management Area (AQMA).
- 2.1.4 The Site does not contain, nor does it form part of, any designated heritage assets, such as World Heritage Sites, Scheduled Monuments, Registered Parks and Gardens, Registered Battlefields, Listed Buildings or locally listed buildings.
- 2.1.5 The Site falls within the Letchworth Conservation Area³ as identified within the North Herts Local Plan⁴. The Conservation Area Appraisal identifies Letchworth’s special character and appearance as deriving from its pioneering Garden City origins, characterised by its planned streets and neighbourhoods, distinctive architectural character, mature trees and vegetation, open spaces, and the strong relationship between buildings and their landscaped setting. Accordingly, new development will be designed to respond positively to these defining characteristics and preserve or enhance the special character and appearance of the Letchworth Conservation Area, whilst respecting the principles of the Garden City.
- 2.1.6 Within a 500m radius of the Site there are 27 Grade II and 2 Grade II* listed buildings, with the closest being The Free Church – a Grade II listed building – approximately 70m east of the Site. Broadway and Howard Park and Gardens are also located 170m west and 250m east of the Site respectively.

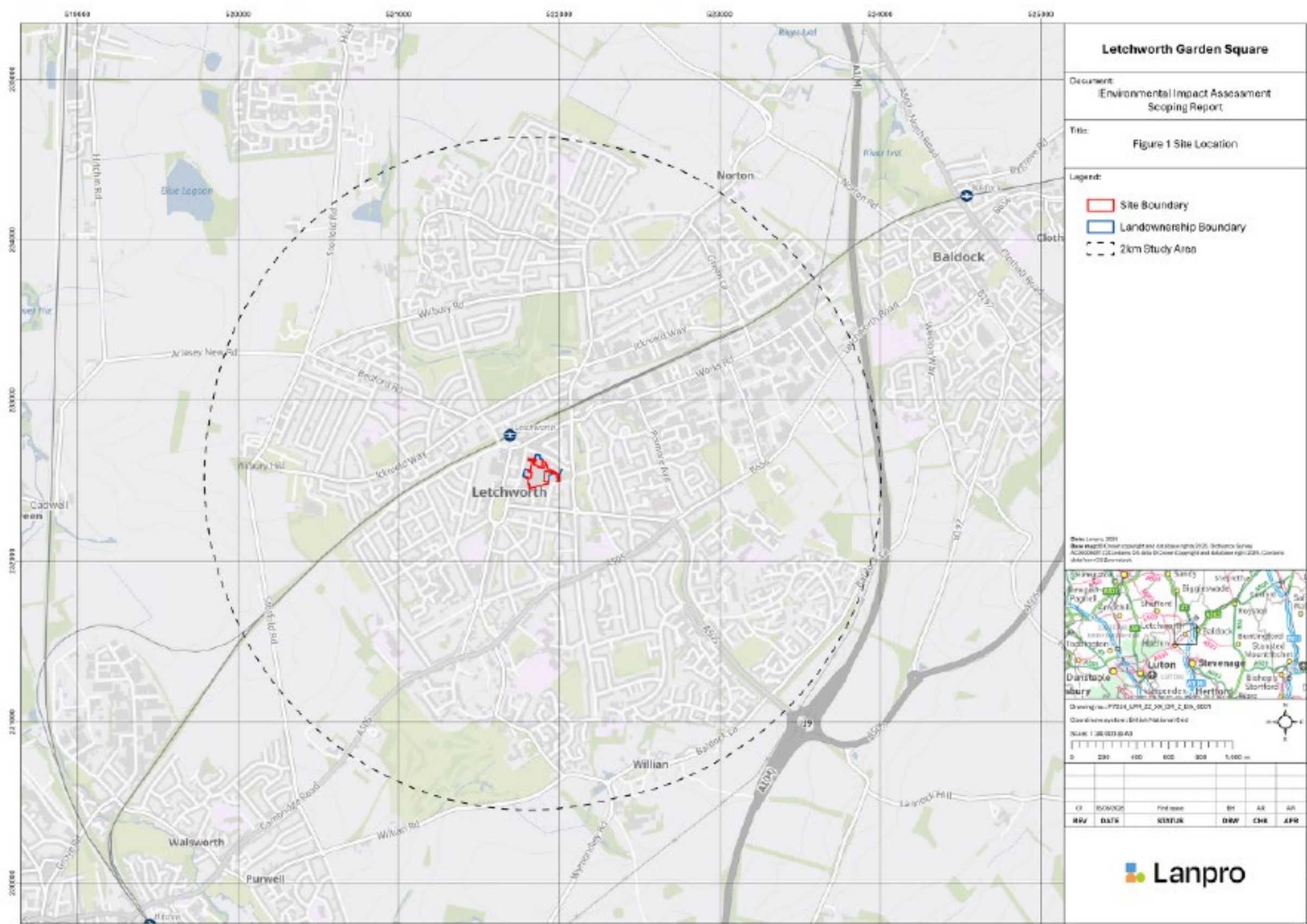
³ North Hertfordshire District Council (2001) Letchworth Conservation Area. Available at: https://www.north-herts.gov.uk/sites/default/files/letchworth_conservation_area_appraisal.pdf

⁴ North Herts Council (2011) North Hertfordshire Local Plan. Available at: https://www.north-herts.gov.uk/sites/default/files/2026-04/CD4%20-%204.1.%20North%20Hertfordshire%20Local%20Plan%202011-2031%20Policy%20Extracts.pdf?utm_source=chatgpt.com

- 2.1.7 There are no statutory or non-statutory ecological designations within or in close proximity to the Site. The nearest statutory ecological designation is Oughtonhead Lane SSSI, located approximately 5.5km to the southwest of the Site.
- 2.1.8 There are three Public Rights of Way (PRoW) within close proximity to the Site, with the closest located along Gernon Walk starting adjacent to the Site along Gernon Road.
- 2.1.9 The nearest body of water is Howard Park paddling pool, located approximately 300m east of the Site. The Site is not located within Flood Zone 2 or 3 (high probability of fluvial flooding) and is not at risk of surface water flooding. Overall, the Site has low risk of flooding.
- 2.1.10 According to the Hertfordshire Minerals and Waste Plan⁵, the Site does not fall within a mineral safeguarding area.
- 2.1.11 Aside the current users of the shopping centre, the closest sensitive receptors to the Site are retail and residential dwellings located adjacent to the Site boundary.

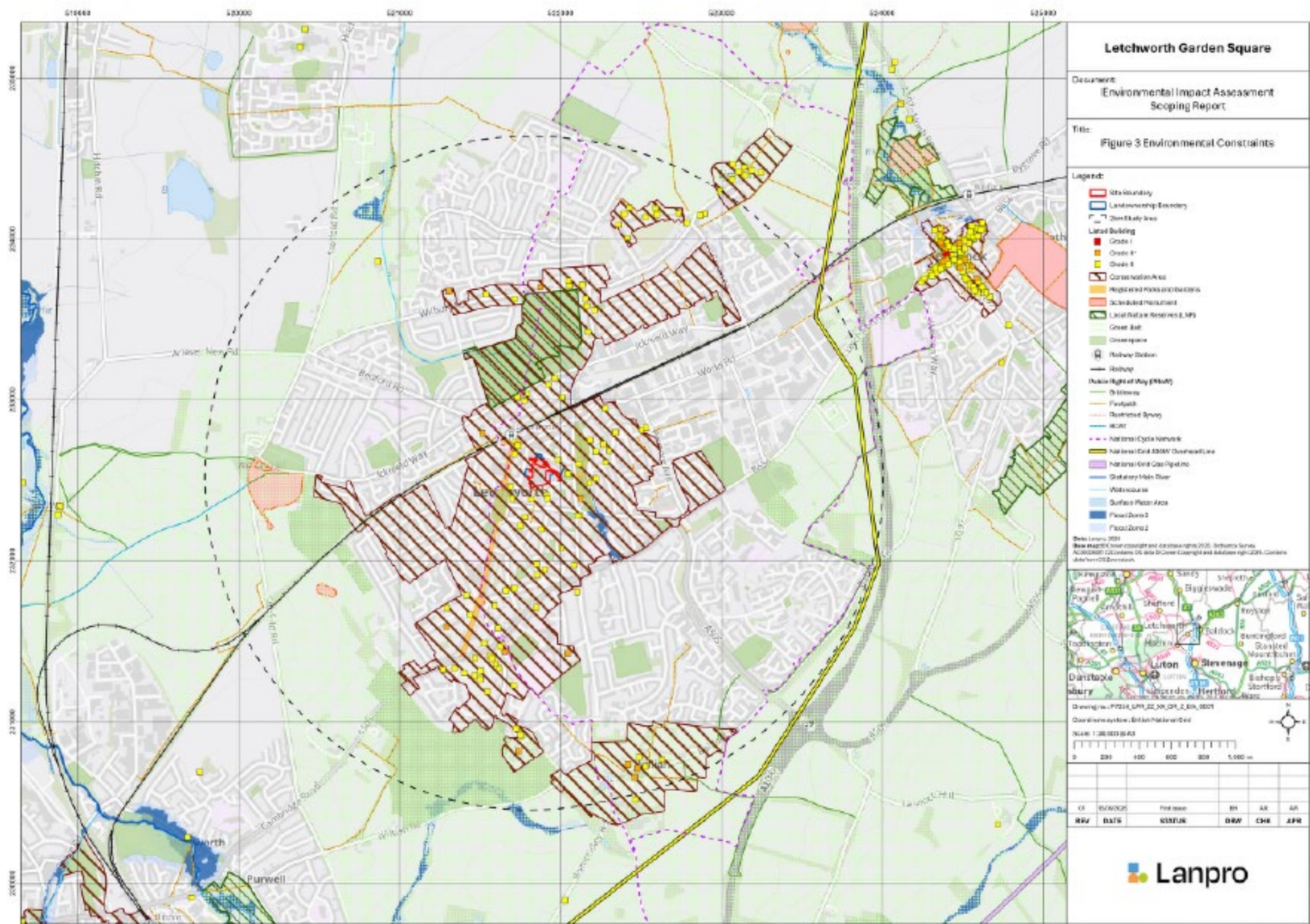
⁵ Hertfordshire (2022) Minerals and Waste Local Plan – 2040 Draft Plan. Available at: <https://www.hertfordshire.gov.uk/media-library/documents/waste/mwlp/core-document-library/core-documents/cd-01-minerals-and-waste-local-plan-draft-plan-jul-2022.pdf>

Figure 1 – Site Location



[illegible]

Figure 3 – Environmental Designations and Sensitivities in proximity to the Site



3 Proposed Development

3.1 Introduction

- 3.1.1 The Proposed Development seeks the demolition of the existing buildings and delivery of up to 240 dwellings (Class C3) and 1,859 sqm (Class E) floorspace (predominantly in retail and food and beverage uses), a serviced parcel for community uses, public open space, pedestrian connections, Sustainable Urban Drainage, access and associated infrastructure.

Demolition and Construction Phase

- 3.1.2 To ensure the potential demolition and construction impacts are minimized, the preparation of an Outline Construction Environmental Management Plan (OCEMP) is proposed prior to construction. The OCEMP will outline the allocated responsibilities, procedures, and requirements for Site environmental management. It will include relevant Site-specific method statement, operating practices, and arrangements for monitoring and liaison with local authorities and stakeholders.
- 3.1.3 The main contractors undertaking the demolition and construction of the Proposed Development will need to adopt and comply with the OCEMP, allocated environmental management responsibilities to a Site Manager, and ensure that all sub-contractors activities are effectively managed in accordance with the OCEMP.
- 3.1.4 The Proposed Development will be delivered in phases over approximately 5 years to ensure the continued operation of parts of the existing shopping centre and reduce the impact on the town centre.

Operational Phase

- 3.1.5 Once occupied, the Proposed Development is anticipated to generate typical levels of residential activity, including vehicle movements and localised noise associated with day-to-day living. The floorspace for retail, food and beverage uses are also likely to contribute to the already active vehicle movement from the existing shopping centre. Nonetheless, the Proposed Development will be designed to promote sustainable transport modes and will include measures for residential amenity protection if required.
- 3.1.6 Any potential environmental effects associated with the operational phase of the Proposed Development, such as those related to traffic, noise, and air quality, are considered to be localised and capable of being managed through standard planning controls and mitigation measures.

Mitigation Measures

- 3.1.7 Mitigation measures will be embedded into the overall design strategy and form an integral part of the Proposed Development. The design will continue to evolve through an iterative process, responding to the findings of consultation and environmental appraisal work. A Design and Access Statement will accompany the planning application and will set out the design principles and concepts that have informed the Proposed Development, including how the design has responded to the Site's context, consultation feedback and the findings of the technical and environmental assessments. Mitigation measures are discussed where applicable throughout this report. To ensure the potential demolition and construction impacts are minimised, the preparation of a OCEMP and Construction Traffic Management Plan (CTMP) are proposed prior to construction. The OCEMP will outline the allocated responsibilities, procedures, and requirements for Site environmental management. It will include relevant site-specific method statements, operating practices, and arrangements for monitoring and liaison with local authorities and stakeholders. The CTMP will outline a framework for minimising impacts from construction traffic on the local and strategic road network.

3.2 Policy Context

- 3.2.1 The North Hertfordshire Local Plan⁴ supports both residential and commercial development within Letchworth Garden City, provided that development respects and enhances the town's unique Garden City heritage and character.
- 3.2.2 The Local Plan states that all development proposals within Letchworth Garden City should have regard to the Letchworth Garden City Design Principles set out in Appendix 5 of the Local Plan, ensuring that new development responds positively to the town's distinctive urban form, landscape, and architectural character.
- 3.2.3 The Council's spatial strategy also supports mixed-use development within the town centre where it contributes to its vitality and viability, encouraging an appropriate mix of residential, commercial, retail, leisure, and community uses to create a vibrant and sustainable town centre.

4 Environmental Impact Assessment Screening Context

- 4.1.1 The Proposed Development does not fall under the descriptions of Schedule 1 developments as defined by the EIA Regulations and hence does not require a mandatory EIA.
- 4.1.2 The proposals fall within Category (10)(b) of Schedule 2 of the EIA Regulations for ‘urban development projects’
- 4.1.3 The need for an EIA is determined on the basis of set criteria, which are outlined below:
- The development falls within one of the classes of development stated in Schedule 2;
 - Exceeds the size threshold for that class of development specified within Schedule 2; or is in a sensitive area as defined by the EIA Regulations; and
 - It is likely to have significant effects on the environment by virtue of factors, such as its nature, size or location.
- 4.1.4 No part of the Proposed Development is to be carried out in a ‘sensitive area’ as defined in Part 1 of the EIA Regulations.
- 4.1.5 The relevant screening thresholds for Category 10(b) projects respectively are:
- ‘The development includes more than 1 hectare of urban development which is not dwellinghouse development; or*
- The development includes more than 150 dwellings; or*
- The overall area of the development exceeds 5 hectares.’*
- 4.1.6 The Site area exceeds the first two of these three thresholds. Therefore, the Proposed Development is categorised as Schedule 2 development and needs to be screened accordingly to understand whether it would give rise to likely significant effects and whether or not an EIA would be required.

Schedule 3 Criteria

- 4.1.7 Schedule 3 of the EIA Regulations sets out the ‘selection criteria’ that should be considered, including the characteristics of the development, its location, the type and characteristics of the potential impacts and the possibility of effectively reducing the impact. This report provides an appraisal of the Proposed Development with reference to these criteria. The sensitivity and location of the Proposed Development is discussed in Section 2 above and the remainder of the Schedule 3 criteria is reviewed in Section 5, with a summary outlined in Section 6.

UK Planning Guidance for EIA

- 4.1.8 Planning guidance from the UK Ministry of Housing, Communities and Local Government ⁶ provides more advice on how to evaluate whether a development is likely to give rise to significant environmental effects or not.
- 4.1.9 The guidance provides a set of indicative criteria, thresholds and key issues to consider when determining whether a development is likely to result in significant effects and hence require an EIA.
- 4.1.10 In relation to Schedule 2 category 10(b) projects, the planning guidance indicative criteria and thresholds state that
- “Environmental Impact Assessment is unlikely to be required for the redevelopment of land unless the new development is on a significantly greater scale than the previous use, or the types of impact are of a markedly different nature or there is a high level of contamination”.*
- 4.1.11 Furthermore, the Planning Practice Guidance (PPG) establishes the following indicative thresholds for these project, as follows:
- “sites which have not previously been intensively developed:*
- (i) area of the scheme is more than 5 hectares; or*
 - (ii) it would provide a total of more than 10,000 sqm of new commercial floor space; or*
 - (iii) the development would have significant urbanising effects in a previously non-urbanised area (e.g. a new development of more than 1,000 dwellings)”.*
- 4.1.12 In consideration of the EIA Regulations and UK government planning guidance, the area of the Site does not meet these thresholds. Therefore, it is considered that the Proposed Development does not significantly increase the bulk and massing of the buildings on the Site in comparison to the existing situation, and will not result in a significant urbanising effect.
- 4.1.13 With regard to the EIA Regulations and UK government planning guidance, it is considered that the development does not constitute EIA development.

⁶ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/630689/eia-thresholdstable.pdf (Accessed 30/10/2024).

5 Environmental Considerations

5.1 Introduction

5.1.1 The features of the Proposed Development and the Site have been evaluated to determine the following environmental topics that may be affected and the potential for significant effects arising from the Proposed Development:

- Traffic and Transport;
- Air Quality;
- Noise and Vibration;
- Climate Change and Adaption;
- Socio-Economics and Human Health;
- Ecology;
- Ground Conditions;
- Water Resources, Flood Risk and Drainage;
- Heritage, Townscape, and Visual Impact;
- Waste Management;
- Daylight, Sunlight and Overshadowing;
- Wind Microclimate;
- Major Accidents and Disasters; and
- Cumulative Effects with other developments.

5.2 Traffic and Transport

5.2.1 Due to the nature of the Site being an existing shopping centre, the area within and surrounding it has been designed to be highly accessible to pedestrians. The Site is bound to the north by Leys Avenue and to the west by Eastcheap, both of which are one-way roads benefiting from wide footways on either side of the carriageway.

5.2.2 It is proposed that the scheme would be accessed via the four existing pedestrian access points into the Site at each direction, that are to be retained. as this best serves the re-provision of the existing retail units.

5.2.3 During the demolition and construction phase, there will be increased traffic associated with Heavy Goods Vehicles (HGVs) and construction personnel travelling to and from the

Site. A CTMP will be implemented to manage traffic movements, ensure safe access for construction vehicles, and minimise disruption to the local highway network. With an effective CTMP in place, transport effects during construction phase will be localised and temporary.

5.2.4 The operational phase of the Proposed Development, being residential in nature, will generate limited vehicle movements associated with future residents. The Proposed Development is designed as a car-light scheme, with only a limited number of car parking spaces proposed, supplemented by the provision of a car club. In addition, approximately 400 long-stay cycle parking spaces for residents and 20 short-stay cycle parking spaces for public use are proposed, supporting sustainable and active travel and reducing reliance on private car use.. Given the scale of the Proposed Development, these movements are expected to be minimal, and no significant impact on the local highway network is anticipated.

5.2.5 A Transport Assessment will accompany the planning application. The scope of the assessment would be agreed with NHC but is expected to include the following to cover the demolition, construction and operational phases:

- A description of the demolition, construction and operational access arrangements, parking provision, site operating hours and worker numbers;
- Details of the number and type of vehicles that would access the site and the routes they would take;
- A description of the baseline and future local transport conditions;
- A review of relevant local, regional and national transport policy;
- An assessment of the likely effects on the transport networks; and
- A description of any measures required to mitigate likely significant adverse effects.

5.2.6 Given that the impacts of the demolition and construction phase would be addressed through the implementation of a CTMP and considering the nature and design of the scheme to minimise vehicular movements and promote new connections and active travel modes, it is considered that effects from transport as a result of the Proposed Development would be not significant.

5.3 Air Quality

5.3.1 The Site is not located within an Air Quality Management Area and the Proposed Development is not a pollutant generator.

5.3.2 Any pollutants or dust associated with the Proposed Development would be primarily associated with vehicle movements to and from the Site or from demolition or construction activity. There would be a slight increase in temporary localised emissions

during the demolition and construction phase, associated with the vehicles used to transport components to/from the Site which would create normal vehicle emissions. Given the limited number of vehicle trips associated with the Proposed Development, and the limited duration and nature of the proposed construction activities, pollutant and dust levels anticipated to arise from the Proposed Development are likely to be low and temporary in duration.

- 5.3.3 General construction good practice would be adopted, details of which would be provided in a CTMP, approved through condition, prior to construction starting. During the construction works, the greatest potential air quality effects relate to dust nuisance. Dust during construction could be effectively managed through a CTMP which would minimise and control dust at source during construction. These measures would be in line with guidance published by the Institute of Air Quality Management (IAQM) and would likely include method statements, hoarding, water suppression and covering of stockpiles/loads. With effective implementation of such measures, dust during the construction phase is not expected to give rise to significant adverse effects on sensitive receptors.
- 5.3.4 Construction plant and equipment used for construction works will be modern and compliant with current emissions standards and, as such, exhaust emissions during construction works are not expected to give rise to significant adverse effects.
- 5.3.5 The transport to and from the Proposed Development would create minimal emissions in the urban environment and would not contribute substantially to local air pollution.
- 5.3.6 Once fully operational, emissions will be limited to those generated by residential and retail traffic; given the scale of the Proposed Development, emissions would be expected to be minimal and not significant. Therefore, it is not considered that the construction or operational effects of the Proposed Development on air quality would be significant.
- 5.3.7 An Air Quality Impact Assessment will be submitted with the planning application to assess current and predicted air quality.

5.4 Noise and Vibration

- 5.4.1 Existing noise sources around the Site include users of the currently occupied Garden Square Shopping Centre, surrounding road network and Letchworth Garden City Railway located approximately 200m north of the Site. An acoustic sound level survey has been undertaken and has indicated the Site is in a low-risk area.
- 5.4.2 The demolition and construction phase of the Proposed Development will generate temporary noise from vehicle movements and on-site activities. Construction traffic will be limited and managed in accordance with the CTMP, while noise and vibration will be minimised through the implementation of good practice measures and controlled through the OCEMP.

- 5.4.3 Operational noise from the Proposed Development would be minimal. Where a receptor is affected by continuous traffic flow, significant increases in traffic flows are required to generate a 'just perceptible' change of 3dB. The Proposed Development is not expected to significantly increase vehicle movements on the local road network during its operational phase, so nearby residential dwellings should not experience significant changes in road traffic noise levels.
- 5.4.4 Vibration from the existing railway line is not expected to be significant.
- 5.4.5 The design of the Proposed Development will include good acoustic design and where necessary, appropriate mitigation measures will be recommended to minimise noise and vibration effects. A Noise Impact Assessment will be submitted to support the planning application to assess current and predicted noise levels.

5.5 Climate Change and Adaption

- 5.5.1 The Climate Change Act 2008 (as amended 2019)⁷ sets up a framework for the UK to reduce its greenhouse gas (GHG) emissions by 100% from 1990 levels by 2050. Furthermore, it promotes the creation of a program focused on adapting to climate change.
- 5.5.2 The key climate projections for the UK (according to the UKCP18)⁸ are that summers would become hotter and drier; winters would become warmer and wetter; soils would become drier on average; snowfall and the number of very cold days would decrease; sea levels would rise; and storms, heavy and extreme rainfall, and extreme winds would become more frequent.
- 5.5.3 The Proposed Development could contribute to global climate change through Greenhouse Gas (GHG) emissions from the following sources:
- Embodied carbon in the building materials associated with the housing development and in any materials required for the development;
 - Traffic and plant associated with demolition and construction;
 - Traffic associated with residents of the residential development; and
 - Regulated energy usage, specifically heating and lighting.
- 5.5.4 Emissions associated with demolition and construction activities and transport will be mitigated through the implementation of best practice measures, including a OCEMP and a CTMP.

⁷ HMSO (2008): Climate Change Act 2008 (2050 Target Amendment) Order 2019.

⁸ Met Office, UK Climate Impacts Programme, British Atmospheric Data Centre, University of East Anglia, Newcastle University. Available from: <https://www.metoffice.gov.uk/research/approach/collaboration/ukcp>

- 5.5.5 The Applicant is committed to embedding sustainable design principles throughout the Proposed Development. Given the residential nature and scale of the scheme, operational GHG emissions are expected to be minimal.
- 5.5.6 The principal climate change risk to the Proposed Development is flooding, which has been discussed in Section 5.9.
- 5.5.7 Considering the minimal expected increase in greenhouse gas emissions and proposed measures to increase efficiency as well as the alignment with current good practices through the application of climate change resilience strategy, it is considered that the Proposed Development is not likely to give rise to significant effects on greenhouse gas emissions and climate change.

5.6 Socio-Economics and Human Health

- 5.6.1 During the demolition, construction and operational phases, the Proposed Development is expected to generate direct and indirect employment opportunities, as well as wider economic effects arising from project delivery. Due to the mobile nature of the construction workforce, construction-related effects are most appropriately considered at a regional scale. Given the size of the Proposed Development, these effects are anticipated to be temporary and beneficial, but not significant.
- 5.6.2 A minor adverse impact on existing retail users within the Site and surrounding recreational receptors may occur during the construction phase as a result of construction activities, increased traffic, and potential effects on tourism. However, these impacts will be mitigated as far as reasonably practicable. The effects are expected to be temporary and confined to the construction phase and are therefore not considered significant. No other direct or indirect significant socio-economic benefits are anticipated.
- 5.6.3 The most significant risks to human health relate to poor ambient air quality and noise conditions. As outlined in the relevant sections (e.g., air quality, road traffic, water contamination), no significant adverse effects on human health through environmental pathways are expected with standard mitigation in place.
- 5.6.4 Once operational, the Proposed Development will continue to support the local economy by creating employment opportunities associated with the retail uses. In addition, the provision of open spaces will enhance the amenity value for future residents.
- 5.6.5 The delivery of up to 240 new dwellings is not anticipated to place significant pressure on local healthcare services, school places, or community infrastructure. The scale of the development is considered proportionate to the capacity of existing services, and no likely significant adverse socio-economic or human health effects are expected as a result. A Retail Impact Assessment will be prepared to support the Planning Application.

5.7 Ecology

- 5.7.1 The Site is over 10km from any designated European ecological site (Ramsar, SPA and SAC). The nearest statutory ecological designation is Oughtonhead Lane SSSI, located approximately 5.5km southwest of the Site.
- 5.7.2 A site walkover has been undertaken to identify the habitats present on the Site and to inform the potential presence of protected species. The Site is dominated by an urban hardstanding environment. The walkover has identified evidence of potential protected species within the Site. As such, further detailed surveys will be undertaken to confirm their presence and inform any necessary mitigation. The following species surveys have been identified and will be carried out in the coming survey season(s):
- Bat survey;
 - Breeding bird; and
 - Wintering bird surveys.
- 5.7.3 The outcomes of these surveys will inform the design of the Proposed Development, with appropriate avoidance, mitigation, and enhancement measures incorporated as necessary. The Proposed Development will follow the mitigation hierarchy during the design process. The first step is to avoid habitat clearance and then habitat creation and/or enhancement within the Site will be required. If there are direct impacts on protected species, then the design will seek to provide specific mitigation measures. The findings will be reported within an Ecological Impact Assessment (EclA) to accompany the planning application.
- 5.7.4 A tree felling inspection in accordance with British Standard 5837:2012 'Trees in relation to design, demolition and construction' will be undertaken, a report will be prepared to support the planning application. The outcomes of the tree survey will inform design to ensure any potential impacts are minimised, and opportunities for tree planting in line with the townscape strategy are explored.
- 5.7.5 Potential enhancements include the retention of habitat buffers and grassland around the Proposed Development, for habitat creation for specific species. These enhancements will seek to provide at least 10% Biodiversity Net Gain (BNG), in line with the mandatory requirements. A BNG Assessment will be submitted to quantify the anticipated net gain which would arise from the Proposed Development including the proposed mitigation provisions.
- 5.7.6 All works will be carried out in accordance with the principles defined in an OCEMP, which will prevent adverse impacts to notable habitats during the construction phase.
- 5.7.7 Therefore, it is considered that the Proposed Development is not considered to cause significant effects on ecology, given the proposed implementation of appropriate mitigation and enhancement measures.

5.8 Ground Conditions

- 5.8.1 The Site consists of an urban hardstanding environment. The surrounding land use, outside of the Site boundary, is characterised by urban, retail use.
- 5.8.2 The Site's bedrock consists primarily of White Chalk Subgroup and is underlain by thick quaternary glacial sand, gravel, and clay deposits. There is no evidence of historical landfill sites on or in close proximity to the Site.
- 5.8.3 Demolition and construction activities will be undertaken in accordance with relevant legislation and best practice to minimise risks to human health and the environment. During construction, there is limited potential for oil spills and leaks from vehicles and plant. These risks will be minimised using normal mitigation measures (such as use of spill kits) which would be set out in an OCEMP.
- 5.8.4 During the operational phase, the Proposed Development is not expected to result in the release of polluting substances to the environment. As such, the risk to receptors (namely human health) is considered to be low and there would be no likely significant effects related to ground conditions or contamination from the operational Proposed Development.
- 5.8.5 A Phase 1 Preliminary Risk Assessment will be conducted to comply with UK guidance and planning requirements. This study would include a review of historical maps, environmental data, and previous site investigations to identify potential contamination risks and inform any recommendations for further intrusive works and necessary remediation measures. Subject to the implementation of any recommendations arising from the assessment, no significant effects are anticipated.

5.9 Water Resources, Flood Risk and Drainage

- 5.9.1 The Site is located within Flood Zone 1 (lowest probability of fluvial flooding) and is not at risk of surface water flooding. The nearest body of water is Howard Park paddling pool, located approximately 300m east of the Site.
- 5.9.2 Potential risks during demolition and construction will be controlled through standard good practice pollution prevention measures, these measures will form part of the OCEMP. Potential pollution sources within the Proposed Development will be dealt with through standard design measures and the Flood Risks Assessment (FRA) and Drainage Strategy. As such, the Proposed Development is not likely to result in any significant water quality effects.
- 5.9.3 Under normal operating conditions the Proposed Development does not pose a risk to human health through pollution or water contamination. Drainage within the Site would be designed and installed in line with current guidance.

- 5.9.4 The planning application would be accompanied by a FRA and Drainage Strategy which would demonstrate that the Proposed Development of the Site can be facilitated without increasing flood risk elsewhere. On this basis, it is not considered that significant effects on water, flood risk and drainage are likely to arise.

5.10 Heritage, Townscape, and Visual Impacts

- 5.10.1 The Site does not contain, nor is it part of, any designated heritage assets such as World Heritage Sites, Scheduled Monuments, Registered Parks and Gardens, Registered Battlefields, or Listed Buildings. There are no previously recorded archaeological sites within the Site.
- 5.10.2 Within 500m of the Site there are 27 Grade II and two Grade II* listed buildings, with the closest being The Free Church, a Grade II listed building, approximately 70m east of the Site. Within 2km of the Site there is also two Scheduled Monuments and two registered Parks and Gardens.
- 5.10.3 The Site falls within the Letchworth Conservation Area⁹, which was first designated in 1969. The current Appraisal dates from 2001 and identifies the planning legacy of Letchworth as a key component of its special architectural and historic interest:
- “The Master Plan is a comprehensive layout, which has been largely adhered to during the development of Letchworth and strongly reflects the concepts of Howard, and Parker and Unwin. The principles behind and the implementation of the Master Plan are essential to the special interest and character of Letchworth.”*
- 5.10.4 Given the urban context of the Site and the nature and scale of the Proposed Development, the extent and magnitude of change to the historic environment are expected to be limited. While some temporary effects may arise during demolition and construction, the Proposed Development is not anticipated to result in likely significant adverse effects on built heritage receptors.
- 5.10.5 The Site currently comprises the Garden Square Shopping Centre, which is predominantly in commercial and retail use and is enclosed by retail premises, residential dwellings and associated street furniture. The demolition, construction and operational phases of the Proposed Development have the potential to result in townscape and visual effects, including:
- Changes to townscape elements and other characteristic features that contribute to the prevailing townscape character.

⁹ North Hertfordshire District Council (2001) Letchworth Conservation Area. Available at: https://www.north-herts.gov.uk/sites/default/files/letchworth_conservation_area_appraisal.pdf

- Changes to townscape qualities, including the degradation, erosion or reinforcement of townscape elements and patterns, as well as perceptual characteristics, particularly those that form key components of the identified townscape character types.
- Changes to townscape character arising from effects on characteristic elements, including perceptual characteristics, townscape patterns and attributes, as well as the cumulative introduction of new features of sufficient magnitude and prominence to alter a notable part of the overall character of a particular townscape character type.
- Temporary adverse townscape and visual effects on the three Public Rights of Way (PRoWs) located in proximity to the Site during the construction phase.
- Cumulative townscape effects arising from the interaction of the Proposed Development with other proposed or consented developments within the same townscape area.

- 5.10.6 Temporary adverse townscape and visual effects are likely to arise during the demolition and construction phase, particularly for visual receptors located in close proximity to the Site. These effects would primarily result from demolition and construction activity, including the presence of construction plant, hoarding, temporary works and changes to existing views.
- 5.10.7 At the national level, the Site is located within National Character Area 87: East Anglian Chalk. At the borough level, the North Hertfordshire and Stevenage Landscape Character Assessment identifies the landscape surrounding Letchworth as falling within the Arlesey/Great Wymondley Landscape Character Area. The latter assessment excludes the urban area of Letchworth.
- 5.10.8 Both assessments cover relatively broad geographical areas and therefore provide useful background and contextual information rather than a detailed assessment of the Site and its immediate surroundings. Given their scale and the urban context of the Site, the Proposed Development is not expected to result in any notable effects on the landscape character identified at these levels.
- 5.10.9 The desktop review has established that North Herts Council does not have a borough-wide townscape character assessment. However, the North Hertfordshire Urban Design Assessment: Letchworth Garden City and the Letchworth Conservation Area Appraisal identify a number of distinct areas and zones within Letchworth. These documents provide a useful basis for understanding the existing townscape character of the Site and its surroundings.
- 5.10.10 A Heritage, Townscape and Visual Impact Appraisal (HTVIA) and Archaeological Report will be prepared to assess the effects of the Proposed Development on designated and

non-designated heritage assets, townscape character areas and representative verified views.

- 5.10.11 The HTVIA will build upon the findings of the Letchworth Garden City Town Centre Strategy SPD, the Letchworth Conservation Area Appraisal and the identified townscape character areas. The assessment will consider the characteristics that contribute to the existing character of the study area, including land use, built form, urban layout, vegetation and the relationship between buildings, streets and open spaces. On this basis, the study area is anticipated to be divided into three Townscape Character Areas (TCAs), reflecting differences in land use, built form, layout and other defining characteristics.

5.11 Waste Management

- 5.11.1 All waste-related activities must comply with The Waste (England and Wales) Regulations (2011)¹⁰.
- 5.11.2 During demolition and construction, the chosen materials and methods will minimise waste generation as much as reasonably possible. Waste will be managed according to best practice guidelines, the Proposed Development will follow the waste hierarchy and where possible the Proposed Development will look to prevent, re-use, recycle or recover waste. If this is not viable then the waste will be disposed of in adherence to agreed procedures, in line with best practice guidance ensuring any potential impacts are mitigated.
- 5.11.3 Waste from soils during demolition and construction must be classified and assessed before disposal. Once classified, the waste can be transported to appropriately licensed facilities, with some waste requiring pre-treatment before disposal. Waste classification should follow the Environment Agency's Technical Guidance¹¹ (WM3, 2018) and may need to be coordinated with the intended landfill site.
- 5.11.4 A OCEMP will be developed and implemented by the relevant contractor in accordance with The Definition of Waste: Development Industry Code of Practice guidance developed by CL:AIRE¹². The OCEMP will include measures to minimise waste, such as a waste hierarchy, and will set out site management procedures such as waste management, recycling opportunities, and off-site disposal. All construction waste will be collected and disposed of by licensed waste management contractors.

¹⁰ The Waste (England and Wales) Regulations 2011 Available from: <https://www.legislation.gov.uk/uksi/2011/988/introduction>

¹¹ Environment Agency, Waste classification technical guidance, 2021. Available from: Waste classification technical guidance - GOV.UK (www.gov.uk)

¹² Contaminated Land: Applications in Real Environments (CL:AIRE) (2011) The Definition of Waste: Development Industry Code of Practice. Version 2. Available from: <https://www.claire.co.uk/component/phocadownload/category/8/initiatives?download=212:definition-of-waste-development-industry-code-of-practice>

- 5.11.5 Demolition of the existing structure is proposed on-site. However, due to the scale of the Proposed Development, the magnitude of waste arisings from demolition and construction is anticipated to be not significant. Waste generated will be managed in accordance with the guidance and good practice measures set out above, with materials, where practicable, being reused or recycled to minimise waste requiring disposal.
- 5.11.6 Waste generated during the operation of the Proposed Development will be limited and will be disposed of in line with NHC's requirements and managed in accordance with all applicable legislation.
- 5.11.7 Therefore, following the provision of good practices and implementation of an OCEMP, it is considered that the Proposed Development will not likely result in likely significant effects on waste management and recycling.

5.12 Daylight, Sunlight and Overshadowing

- 5.12.1 The Site comprises buildings of 2-5 storeys in height, with the maximum of 5 storeys in the centre. The only potentially sensitive developments to daylight, sunlight and overshadowing effects are the residential receptors on the Site boundary. The scheme design is being informed by the guidance and recommendations set out in the BRE guide to minimise the level of potential effect upon existing and future residential dwellings.
- 5.12.2 Careful layout design will ensure a good level of daylight and sunlight compliance across the scheme. The Proposed Development will not include tall buildings or dense structures that could result in significant obstruction of light. Buildings will be low- to medium-rise, up to a maximum of five storeys, and will be appropriately spaced, with setbacks, to maintain adequate access to daylight and sunlight for surrounding properties. As a result, significant effects on daylight, sunlight, or overshadowing are not expected.
- 5.12.3 A Daylight and Sunlight Assessment will be submitted with the planning application to assess current and predicted daylight and sunlight levels to ensure no impact to residential amenity.

5.13 Wind Microclimate

- 5.13.1 The NPPF does not provide guidance on the assessment of wind microclimate, nor has any relevant local planning guidance or policy relating to wind microclimate been identified.
- 5.13.2 The majority of the Site comprises buildings of 2–5 storeys in height. The Proposed Development will vary in height throughout the Site between 2-3/4/5 storeys, with the maximum of 5 storeys in the centre of the Proposed Development.

- 5.13.3 The Proposed Development will have increased building heights but will not include tall buildings, structures or massing that could lead to wind microclimate effects upon residences either within the Proposed Development or in the surrounding areas. It is not expected to introduce any new or significant wind conditions for pedestrians at ground level. As such, the Proposed Development is unlikely to give rise to any likely significant effects related to wind microclimate.

5.14 Major Accidents and Disasters

- 5.14.1 Construction activities can pose accident risks if not properly managed. Demolition and construction of the Proposed Development will be undertaken in accordance with current health and safety regulations and guidance, in order to minimise the risk of accidents. A OCEMP would be prepared for the construction phase, including mitigation measures to reduce accident risks.
- 5.14.2 The design of the Proposed Development will be in accordance with industry standards including drainage and building regulations and ensure that the potential for accidents and natural disasters impacting on the operational Proposed Development, are unlikely.
- 5.14.3 The documents, set out in Section 6, would accompany the Planning Application and address potential risks associated with the Proposed Development. These would include a Flood Risk Assessment and Drainage Strategy, which would consider contamination and flood risk at the Site, and a Transport Statement, which would assess transport-related accidents and safety.
- 5.14.4 With the adoption of standard good practice, the Proposed Development is unlikely to give rise to any likely significant effects related to major accidents and disasters.

5.15 Cumulative Effects with other Developments

- 5.15.1 The potential for cumulative effects with other committed developments has been considered using good practice. A search was conducted using the following criteria:
- Expected to be built-out at the same time as the Development and with a defined planning and construction programme;
 - Spatially linked to the Development (within 2km of the Development);
 - Considered an 'EIA development' and for which an ES was submitted with the planning application;
 - Those which have received planning consent from the planning authority (granted or resolution to grant); and / or

- Introduce sensitive receptors within close proximity of the Site boundary (but are not EIA development).

5.15.2 Planning applications listed on the Council's websites in the last five years (since 2021) have been reviewed. Nationally Significant Infrastructure Projects in the area listed on the Planning Inspectorate's National Infrastructure Planning website have also been reviewed.

5.15.3 **Table 1** sets out a schedule of potential cumulative schemes, with **Figure 4** illustrating the spatial relationship to the Site.

Table1: Consented and Committed ‘Other Developments’

Ref. No.	Address	Planning App. Reference	Development Summary	Approximate Distance from Site	Planning Status
1	Land North Of Highover Farm To Stotfold Road Highover Way Hitchin Hertfordshire	18/01154/OP	Outline application with all matters reserved other than access, comprising residential led development of up to 700 dwellings of use class C3 (dwellings), approximately 500 sqm of neighbourhood-level facilities, a new 2FE primary school, open space, play space, green infrastructure, and associated accesses (vehicular, pedestrian and cycle), including a new primary access off Stotfold Road with limited access off High Dane (as amended).	1.8km	Approved 29 November 2024
2	Land On Campfield Way Letchworth Garden City Hertfordshire	24/00326/FP	Redevelopment of site comprising demolition of existing buildings and provision of 157 dwellings; associated roads, landscaping, open space, car and cycle parking provision, drainage and infrastructure works and all associated ancillary works (as amended)	1.0km	Pending Planning Application
3	Land East Of Kristiansand Way And Talbot Way Letchworth Garden City Hertfordshire	21/00504/OP	Residential development comprising of up to 120 dwellings with vehicular access via Flint Road (all matters reserved except means of access.)	1.9km	Approved 03 April 2025

Letchworth Garden Square

Document: Environmental Impact Assessment Scoping Report

Title: Figure 4 Cumulative Development Sites

Legend:

- Site Boundary
- Landownership Boundary
- 2km Study Area
- Cumulative Development Site

Scale: 1:25,000 @ A3

Coordinate system: British National Grid

REV	DATE	STATUS	DRW	CHK	APP
02	5/09/2026	Second Issue	BH	AR	AW
01	5/06/2026	First Issue	BH	AR	AW

Lanpro

- 5.15.4 The nature, scale and use of the Proposed Development is such that, when considered in cumulation with the other approved development outlined in **Table 1**, the effects are unlikely to be significant. In the absence of mitigation there would otherwise be the potential for cumulative effects from construction works relating to traffic, air quality and noise, should these works overlap. However, such effects would be of a temporary nature and managed to an acceptable level through standard widely applied good practice environmental management measures as part of a OCEMP for each scheme. With respect to the potential for cumulative traffic effects, the Proposed Development and the cumulative scheme in **Table 1** are well served by the existing local strategic road network, which is suitable for HGVs and other construction traffic during the construction phase. Significant cumulative effects related to construction would therefore not occur.
- 5.15.5 With respect to the potential for cumulative traffic effects, the Development and the cumulative schemes in **Table 1** are well served by the existing local strategic road network, which is suitable for HGVs during construction.
- 5.15.6 During operation, cumulative effects are anticipated to be primarily associated with townscape and visual impacts, given the location of the Proposed Development within a conservation area. The massing and design of the Proposed Development would be in keeping with the local townscape character and emerging development context. Existing built form is also expected to limit opportunities for intervisibility with the identified cumulative schemes.
- 5.15.7 Transport and traffic may also be a cumulative consideration. Appropriate assessments of transport and access for the identified schemes would be undertaken in accordance with NHC's planning requirements, with mitigation measures incorporated where required. Overall, cumulative landscape, visual, transport and traffic effects are anticipated to be not significant.
- 5.15.8 Overall, it is considered unlikely that there would be significant effects of the cumulative schemes in combination with the Proposed Development.

6 Conclusion

- 6.1.1 This EIA Screening Appraisal demonstrates that, with the adoption of standard and appropriate mitigation measures and through its design, the Proposed Development is not likely to result in significant adverse effects on the environment by virtue of factors such as its nature, size or location. As such, it is considered that the Proposed Development does not constitute EIA development.
- 6.1.2 In addition to the information contained within this screening opinion request, we can confirm that the anticipated contents a forthcoming application will be as listed below.
- 6.1.3 Based on the analysis set out in this document, it is anticipated that the following documents would be submitted to accompany the planning application:
- Application Form and Certificates;
 - Location Plan;
 - Site Layout and Elevation Plans;
 - Landscape Plan;
 - Planning Statement;
 - Retail Impact Assessment;
 - Design and Access Statement;
 - Air Quality Assessment;
 - Site Archaeological Report;
 - Biodiversity Net Gain Metric;
 - Daylight and Sunlight Assessment;
 - Biodiversity Surveys and Ecological Reports;
 - External Lighting Survey;
 - Flood Risk Assessment and Drainage Strategy;
 - Fire Strategy / Statement;
 - Heritage, Townscape and Visual Impact Assessment (HTVIA);
 - Phase 1 Preliminary Risk Assessment – Contaminated Land;
 - Tree Survey/ Planting Plan
 - Noise Impact Assessment;
 - Outline Construction Environmental Management Plan;

- Statement of Community Involvement;
- Structural Survey and Method Statement;
- Sustainability Statement;
- Transport Assessment (including Access and Maintenance Strategy / Delivery and Servicing Plan / Construction Traffic Management Plan);
- Green Travel Plan;
- Open Space Assessment;
- Energy Statement;
- Waste Management Details; and
- Viability Assessment.

6.1.4 We trust that this letter provides sufficient information, and we would be grateful to receive your formal EIA Screening Opinion in line with Regulation 6(1) of the EIA Regulations within the stipulated three-week timescale.

Office Locations

Edinburgh

1 Lochrin Square,
92-98 Fountainbridge,
Edinburgh,
EH3 9QA
01316 000319

York

Stanley Harrison House,
The Chocolate Works,
Bishopthorpe Road,
York,
YO23 1DE
01904 803800

Manchester

100 Embankment,
Cathedral Approach,
Manchester,
M3 7FB
01617 111740

Norwich

Brettingham House,
98 Pottergate,
Norwich,
NR2 1EQ
01603 631319

Cambridge

1A Clifton Court,
Clifton Road,
Cambridge,
CB1 7BN
01223 776740

London

120 Moorgate,
London,
EC2M 6UR
020 3011 0820

