

Planning and Affordable Housing
Statement
Broadwater Gardens

Relating to site at
BioPark, Broadwater Road, Welwyn Garden City, AL7 3AX
December 2020



hghconsulting.com



Contents

- 1.0 Introduction.....3
- 2.0 Site Description and Surrounding Area9
- 3.0 Planning History12
- 4.0 Pre-Application Consultation and Scheme Evolution16
- 5.0 Development Proposals22
- 6.0 Planning Policy and Guidance.....25
- 7.0 Planning Assessment.....31
- 8.0 Affordable Housing Statement.....70
- 9.0 Conclusion.....73

- Appendix 1 - Schedule of Application Plans and Drawings
- Appendix 2 - First WHBC Pre-Application Response
- Appendix 3 - Second WHBC Pre-Application Response
- Appendix 4 - Third WHBC Pre-Application Response
- Appendix 5 - Accommodation Schedule
- Appendix 6 - Lambert Smith Hampton Letter

1.0 Introduction

1.1 On behalf of HG Group, hgh Consulting have been instructed to prepare and submit a planning application to Welwyn Hatfield Borough Council (“WHBC” or “the Council”) in respect of the proposed redevelopment of the BioPark site (Figure 1) in Welwyn Garden City. The proposed development is referred to as “Broadwater Gardens”. This Planning Statement (“PS”) is submitted in support of the planning application.

1.2 The application seeks full planning permission for:

“Demolition of existing buildings and construction of 289 residential units (Use Class C3) and community hub (Use Class E/F.2), with public realm and open space, landscaping, access, associated car and cycle parking, refuse and recycling storage and supporting infrastructure.”

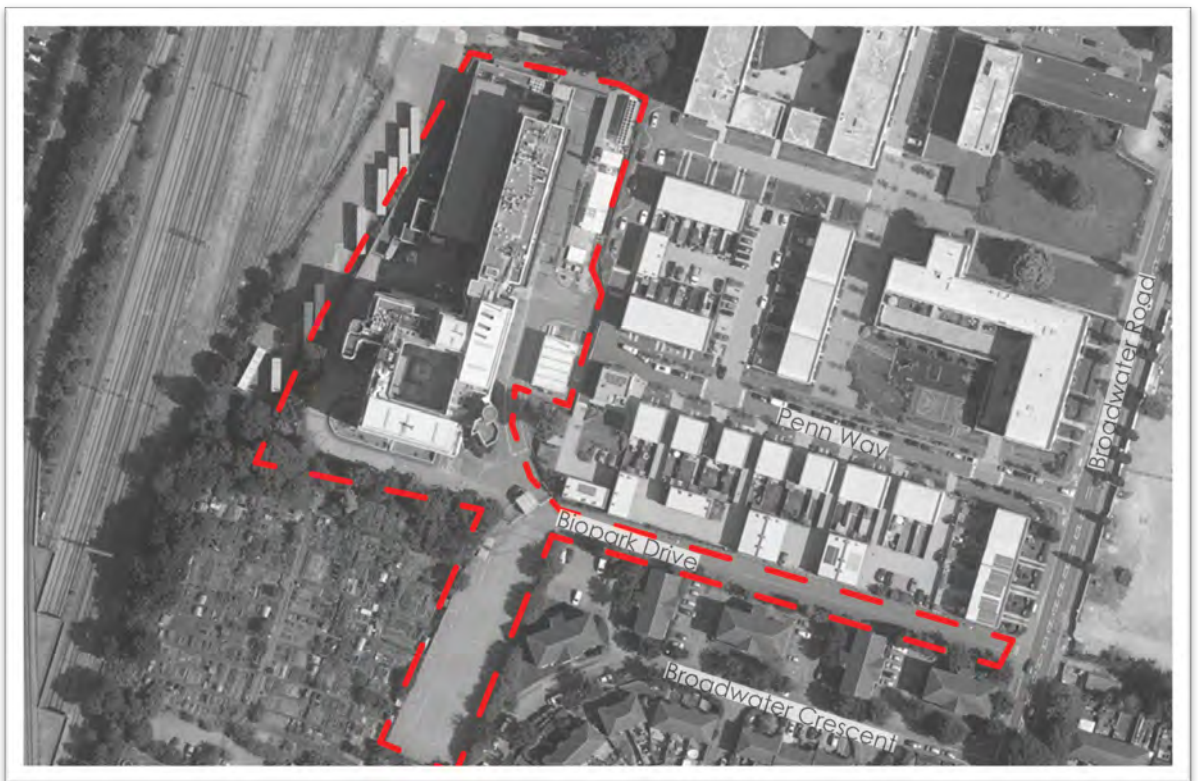


Figure 1: Site location plan

- 1.3 The proposal (Figure 2) is to redevelop the site to provide a high-quality development of 289 residential units including 6 apartment blocks ranging from 2 to 9 storeys within the northern area of the site and 8 townhouses (Figure 3) in the southern area. The proposed unit mix is 129 x 1-bed (44%); 126 x 2-bed (44%); 26 x 3-bed (9%); and 8 x 4-bed (3%). 29 units (10%) are proposed as affordable housing, with a tenure split of 20 (69%) shared ownership and 9 (31%) social rented units.



Figure 2: CGI of the proposed development looking southwards towards the community hub

- 1.4 A community hub is proposed at ground floor in Block E in flexible Use Classes E/F.2 to include a café or gym. The development is complemented by an extensive public realm which connects the site into surrounding development and provides 3,023 sqm of landscaped public open space within the site. For future residents, 800 sqm of communal amenity space is provided in the form of roof terraces. This is in addition to each unit benefitting from private amenity space.



Figure 3: Visual of the proposed townhouses

- 1.5 The planning application follows on from comprehensive pre-application consultation with WHBC, Place Services (Urban Design and Heritage), Historic England and Hertfordshire County Council (Highways and Drainage), as well as public consultation with the local community and stakeholders.
- 1.6 The project team have worked on addressing the key matters raised by officers in follow-up written advice letters dated 1st July 2020, 10th September 2020 and 19th November 2020, as well as in the agreed meeting minutes of the design workshop received on 2nd October 2020. The design scheme and supporting documents have been revised in response to feedback from officers and the public consultation.
- 1.7 This PS outlines the site history and the context of the site within the wider locality. It supports the proposed redevelopment of the site, referring to its design evolution and justifying its acceptability in planning terms. The justification in this Statement is set out against relevant local and national planning policies, guidance and other material considerations.
- 1.8 The Statement should be read in conjunction with the accompanying plans, Design and Access Statement and technical reports noted at Paragraph 1.10. A schedule of the application plans and drawings is at Appendix 1.

The Applicant and Consultant Team

- 1.9 hgh Consulting are the appointed planning consultants and have been instructed to prepare this PS and coordinate the application submission to WHBC.
- 1.10 The application submission includes the following documentation:
- Application Form (& signed Certificate B);
 - Application Fee (£56,765 paid online via Planning Portal);
 - CIL Form;
 - Topographical survey;
 - Site location plan (Alan Camp Architects, “ACA”);
 - Existing site plan (ACA);
 - Existing floor plans and elevations;
 - Proposed site plan (ACA);
 - Proposed floor plans, elevations and sections (including floor levels) (ACA);
 - Landscaping plans (Bradley Murphy Design, “BMD”);
 - Design and Access Statement (ACA), incorporating:
 - Landscaping Strategy (BMD); and
 - Character Analysis and Appraisal.
 - Planning Statement (hgh Consulting), incorporating:
 - Affordable Housing Statement (hgh Consulting); and
 - Accommodation Schedule (ACA).
 - Environmental Statement (hgh Consulting), incorporating:
 - Air Quality Assessment (Air Pollution Services);
 - Highways Assessment (i-Transport); and
 - Heritage and Townscape Assessment (Bidwells).
 - Heritage and Townscape Visual Impact Assessment (Bidwells);

- Transport Assessment (i-Transport);
- Framework Travel Plan (i-Transport);
- Daylight and Sunlight Reports (x 2) (Anstey Horne);
- Flood Risk Assessment and Drainage Strategy (Curtins);
- Phase I and II Geoenvironmental Assessment and Validation Letter (Symbiotic Solutions);
- Noise Assessment (Noise Solutions);
- Ecological Impact Assessment (Green Environmental Consultants);
- Arboricultural Report (including AIA and AMS), Tree Survey and Tree Protection Plan (David Clarke);
- Financial Viability Assessment (Kempton Carr Croft);
- Energy Strategy (EDC Engineers);
- Sustainability Strategy (Stroma);
- Fire Strategy (BB7);
- Statement of Community Involvement (Marengo Communications);
- Economic Statement (hgh Consulting);
- Health and Wellbeing Statement (hgh Consulting);
- Marketing Assessment (Savills);
- Basement Impact and Ground Movement Assessment (GEA);
- Construction Management Plan (HG Group); and
- Site Waste Management Plan (HG Group).

Structure of the PS

1.11 The remaining sections of this Statement are structured as follows:

- **Section 2** provides a description of the site and local area;
- **Section 3** summarises the relevant planning history for the site and other sites of relevance in the Broadwater Road West Opportunity Area;
- **Section 4** outlines the pre-application consultation and public consultation undertaken;
- **Section 5** provides a summary of the development proposal;
- **Section 6** outlines the planning policy framework for the proposed development;
- **Section 7** justifies the proposed development against the relevant planning policy and material considerations;
- **Section 8** outlines and justifies the proposed affordable housing provision;
- **Section 9** summarises and concludes the PS.

2.0 Site Description and Surrounding Area

Site Location and Description

- 2.1 The site (Figure 4) comprises a part five, part two storey (with 2 basement levels) Research and Development (B1b use) complex which was formerly owned, used and let by the University of Hertfordshire. The existing building has a maximum height of 34.75 metres to the top of the chimney flues and a height of 30.51 metres to the stair core roof on the roof top. On the northern part of the site, the complex includes specialist laboratory and associated office space within the main building and a number of outbuildings close to the eastern boundary. In the southern part of the site there is an associated car parking area. The site area is approximately 1.24 hectares.
- 2.2 The site is located in Welwyn Garden City and is a short distance to the south east of the train station and town centre. The railway line separates the site from the town centre with access provided via a footbridge approximately 350m to the north of the site. Vehicular access to the site is provided via BioPark Drive, a private road which joins Broadwater Road.



Figure 4: The site and surroundings

Surrounding Area

- 2.3 The site lies within the zone which was originally designated for industrial uses during the early growth of the Garden City. However, in recent years, this area to the west of Broadwater Road has evolved to become predominantly residential mixed-use development, with the emerging vernacular incorporating references to the area's industrial past.
- 2.4 To the north of the site is the Pall Mall distribution warehouse, to the east is residential development at the former Roche Products site, to the south are allotments and residential properties on Broadwater Crescent, and to the west is a strip of hardstanding used for trailer storage, beyond which lies the railway line. The car parking area in the southern part of the site is bordered by the allotments to the west and residential properties on Broadwater Crescent to the south and east.

Planning Designations

- 2.5 In the adopted Local Plan, the site has the following designations (Figure 5):
- Employment Area (EA1 - Welwyn Garden City Industrial Area); and
 - Mixed Use Development Site at Broadwater West.

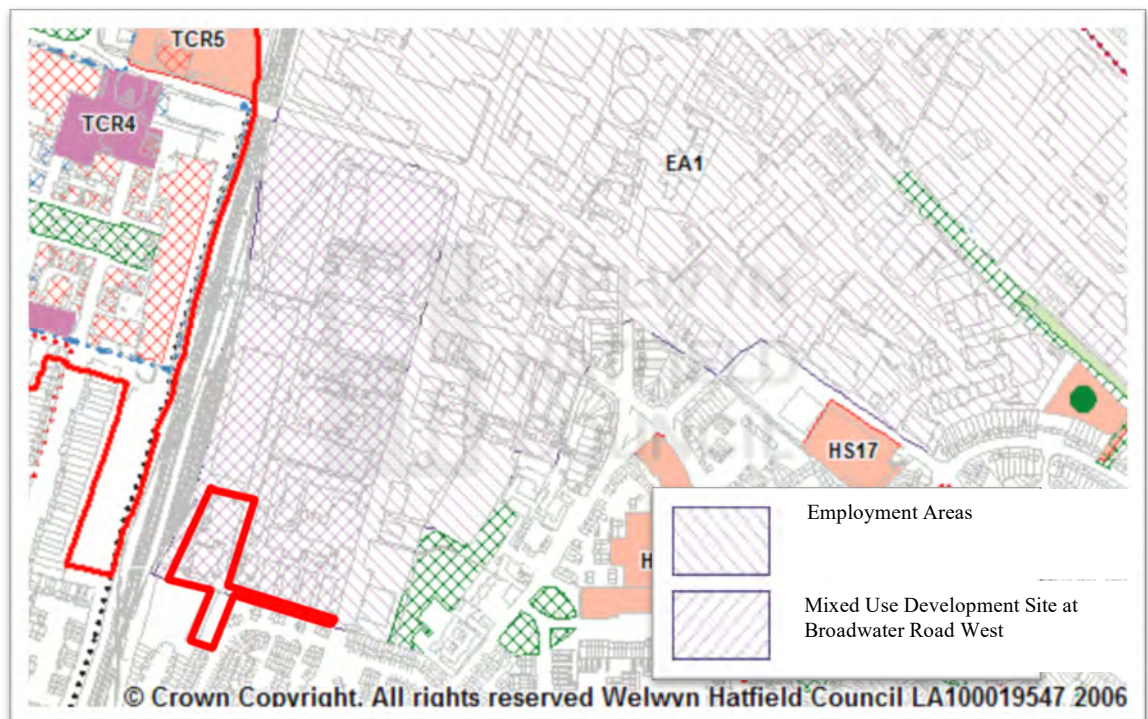


Figure 5: Extract from the adopted proposals map

2.6 The adopted Parking Standards Supplementary Planning Guidance (“SPG”) (2004) designates the site predominantly within parking Zone 2 with the southern part used for car parking in Zone 3.

2.7 Figure 6 shows the proposals map for the draft Local Plan, which designates the site within the Broadwater Road West Mixed-Use Area.

2.8 There are no listed buildings within the site (Figure 7), nor is the site within a Conservation Area. An office block associated with the former Roche Products Factory to the east is Grade II Listed. The former Shredded Wheat Factory is to the north east of the site; the Production Hall and silos are Grade II Listed. Welwyn Garden City town centre Conservation Area lies to the west on the opposite side of the railway line.

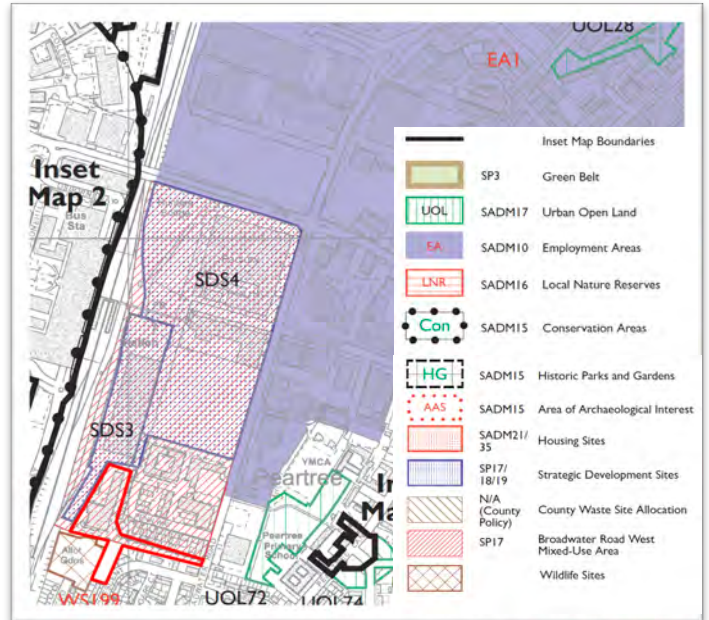


Figure 6: Extract from the draft Proposals Map

2.9 The entire site is within Flood Zone 1, meaning it has a low probability of flooding (Figure 8).

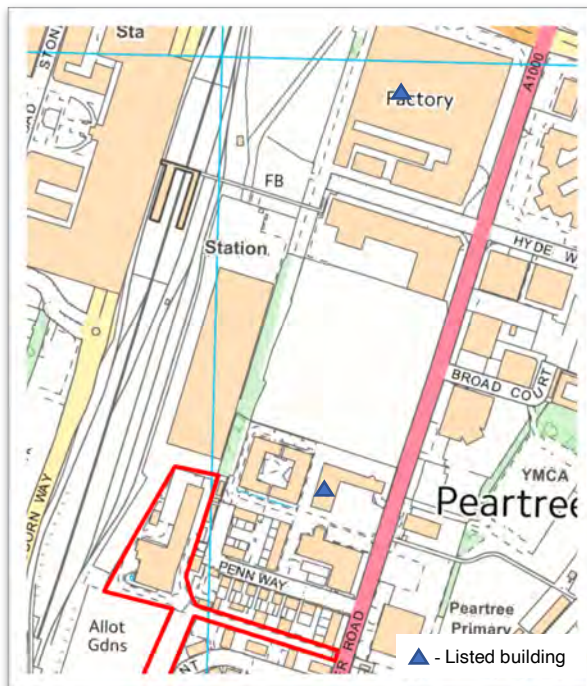


Figure 7: Extract from Historic England Listed Buildings map



Figure 8: Extract from the Environment Agency Flood Map for Planning

3.0 Planning History

The Site

3.1 A desktop review of WHBC's online planning database returned the following results:

Reference	Description of Development	Decision (Date)
N6/664/2001/FP	Erection of two storey building for employment (B1) use.	Approved (July 2001)
N6/665/2001/FP	Erection of fencing and gates at south east entrance to 2 of 4 Broadwater Road site, plus movement of existing turnstile and installation of second turnstile at same entrance.	Approved (July 2001)
N6/666/2001/FP	Installation of personnel turnstile and additional fencing at north east entrance to Broadwater Road site.	Approved (July 2001)
N6/2006/0700/FP	Internal and external alterations	Approved July 2006
6/2017/1243/FULL	Retention of 3 and erection of 1 further antenna on lift shaft roof of BioPark.	Approved (August 2017)

3.2 The above applications relate to the former Research and Development operation of the site, and telecoms operations on the existing building, and are not relevant to the current proposals.

3.3 The following result relates to the EIA screening of the current development proposals:

Reference	Description	Decision (Date)
6/2020/2354/EIA	Request for a Screening Opinion to determine whether an Environmental Statement is required for a proposed redevelopment of BioPark, Broadwater Road, Welwyn Garden City, AL7 3AX	EIA Required (18 th November 2020)

3.4 A request for a Screening Direction in relation to the above Screening Opinion was submitted to the Secretary of State on 20th November 2020. At the time of writing, no response has been received. Accordingly, the planning application is submitted with a supporting Environmental Statement in response to WHBC's Screening Opinion.

Broadwater Road West Opportunity Area

3.5 The following planning history records relate to other sites within the Broadwater Road West Opportunity Area:

Site	Reference	Description of Development	Decision (Date)
Former Shredded Wheat Factory	2015/0293	Part demolition, repair, restoration, extension and conversion of the former Shredded Wheat factory complex to include demolition of all buildings and structures except the original 1920's silos, production hall, grain store and boiler house. Refurbishment and change of use of the retained listed buildings to provide 2 Class C3 residential units, a Class C1 boutique/budget hotel, Class B1(a) offices, a class Class A4 pub/bar, a class Class D1 crèche and a Class D2 gym/dance/exercise.	Approved (March 2017)
	N6/2015/0294/PP	Outline application for the part demolition, repair, extension of conversion of the former Shredded Wheat factory. Refurbishment and change of use of the retained listed buildings. Erection of up to 805 units and c. 14,000sqm of commercial and community floorspace.	Approved (November 2017)
	6/2018/0171/MAJ	Creation of a mixed-use quarter comprising the erection of up to 1,340 residential dwellings including 414 (31%) affordable dwellings (Use Class C3); 114 extra care homes (Use Class C2); the erection of a civic building comprising 497 m ² of health (Use Class D1), 497 m ² of community use (Use Class D1), 883 m ² of office (Use Class B1) and 590 m ² of retail (Class A1/A2/A3/A4/A5); alterations, additions and change of use of Grade II Listed Building and retained Silos to provide 5,279 m ² of flexible business floorspace (Use Class B1), 270 m ² Combined Heat and Power (Sui Generis), 2,057 m ² International Art Centre (Use Class D1), 1,235 m ² Gymnasium (Use Class D2), 1,683 m ² of restaurant/coffee shop/bar (Use Class A1/A3/A4/A5), Creche/Day Nursery (Use Class D1) of 671 m ² as well as a Network Rail TOC Building (Use Class B1) of 360 m ² ; plus associated	Approved (February 2019)

		car parking, access, landscaping, public art and other supporting infrastructure.	
	6/2019/1330/FUL	Erection of a 5-storey Community Bridge Building (1,257m ²) for flexible use (B1/D1/D2 Use Classes)	Refused (December 2019) Appeal Dismissed (August 2020)
Former Roche Products Site	N6/2010/1776/MA	Erection of 209 dwellings and the retention and alteration of the existing listed building for community uses, together with associated open space, landscaping, car parking and new access arrangements	Approved (March 2011)
	N6/2016/1882/FUL	Conversion of the listed Roche building to provide 34 residential units.	Approved (October 2018)

3.7 These recently approved and completed developments within the Opportunity Area have contributed to the changing character of this former industrial area towards an increasing proportion of residential uses at densities reflecting the area’s sustainable urban location.

Other Surrounding Sites

3.8 The following recent planning history records relate to sites beyond the Opportunity Area but in close proximity to the site:

Site	Reference	Description of Development	Decision (Date)
73 Bridge Road East	6/2020/2268/MAJ	Erection of two new buildings comprising 111 residential apartments	Pending decision
29 Broadwater Road	6/2019/3024/MAJ	Demolition of office building and erection of 128 flats with associated car parking, landscaping, amenity space, bin and cycle storage, with alterations to existing and formation of new access on Broadwater Road and alterations to the existing access on Broad Court.	Approved (July 2020)
37 Broadwater Road	6/2018/2387/MAJ	Construction of new build of 22 x 2 Bedroom and 2 x 3 Bedroom residential apartments with balconies and a roof garden. Layout of 26 car parking spaces, cycle parking, refuse store, internal access routes, landscaping and supporting infrastructure.	Approved (July 2019)
Accord House, 28	6/2018/2472/MAJ	Removal of roof and addition of three new floors of residential accommodation comprising 24 x 1 bed	Approved (October 2018)

Bridge Road East		flats and 1 x 2 bed flat, alterations to external appearance, provision of cycle parking and bin storage areas and amendments to car parking to provide disabled spaces	
Mercury House 1 Broadwater Road	6/2016/2624/FULL	Change of use from B1(a) office to C3 residential, construction of roof and side extensions, creation of 43 residential apartments and cycle storage compound	Approved (September 2017)

3.9 These recently approved applications are indicative of the broader shift towards residential uses within the former industrial area.

4.0 Pre-Application Consultation and Scheme Evolution

4.1 This section of the Statement summarises the consultation with WHBC and Place Services to date and the principal amendments to the proposals that have been made in response to the feedback received. This section should be read alongside Section 3.0 of the Design and Access Statement, which provides further detail on the iterative design process, and the Statement of Community Involvement, which outlines pre-application engagement with stakeholders and the local community.

First Pre-Application Submission to WHBC

4.2 The first pre-application pack was submitted on 27th March 2020 and comprised:

- Pre-Application Form;
- Planning Cover Letter;
- Design and Access Statement; and
- Initial Townscape and Heritage Impact Assessment.

4.3 The proposals were presented to Clare Howe (Principal Major Development Officer, WHBC), Sarah Smith (Development Management Services Manager, WHBC), Martin Ivatt (Principal Urban Design Consultant, Place Services), and Maria Kitts (Senior Historic Buildings Consultant, Place Services) at a virtual meeting on 4th June 2020.

4.4 The written pre-application response was received from WHBC on 1st July 2020 (Appendix 2).

Design Response to the First Pre-Application

4.5 Following the first round of pre-application, the principal amendments made to the scheme in response to WHBC's and Place Services' feedback were:

- **Scale/ Height** - The massing was substantially reduced from a maximum of 15 storeys to a 9 storey maximum. The heights of the buildings were rationalised to limit the steps in roof height across each building;
- **Layout** - The removal of the perimeter road at the southern and western edges of the site enabled a more efficient use of the site. The layout of the southern section of the site was redesigned to propose townhouses and a small flatted block. The majority of the surface level car parking was relocated to basement or undercroft levels;
- **Density and Site Coverage** - The density was reduced from approximately 251dph to 243dph;

- **Number of Units** - The overall number of units was reduced by 43 units from 340 to 297;
- **Unit Mix** - The pre-application 1 proposals included 66 x 1-bed (19%); 198 x 2-bed (59%); 76 x 3-bed (22%). The pre-application 2 housing mix was revised to comprise 102 x 1-bed (34.3%); 123 x 2-bed (41.4%); 64 x 3-bed (21.5%); and 8 x 4-bed (2.7%);
- **Townhouses** - The southern area of the site was redesigned to remove low-rise apartment blocks and provide 8 townhouses with car parking at ground level, rear gardens and landscaped terraces on the upper floors;
- **Block F** - The part of the site where the southern section adjoins the wider northern section was revised to provide a small flatted block which turns the corner of the access road and links the townhouses with the larger massing to the north;
- **Community Hub** - A new space was introduced at ground floor in Block E, shown as a double height gym and café, which opens out onto the main courtyard and creates a community hub environment;
- **Accessible/ Adaptable Units** - 28 units (9.4%) were proposed as M4(3) wheelchair user dwellings and the remainder to meet M4(2) standards for accessible and adaptable dwellings;
- **Context Study** - A context study of the site surrounds and wider Garden City vernacular was developed to inform the materiality of the proposals;
- **Materials** - A lighter alternative material (copper/bronze cladding) was incorporated on the upper floors of the buildings and render no longer proposed as part of the material palette;
- **Car Parking** - The overall number of parking spaces was increased slightly from 150 to 156 (including 118 standard and 28 blue badge bays), equivalent to an increase from a 0.44 ratio to a 0.53 ratio. The proposed underground basement car park was extended to allow the vast majority of car parking to be located at basement level. The townhouses were provided with undercroft parking; and
- **Access Road** - The access road to the site was enhanced by proposing street trees and traffic calming features to create a 'boulevard setting', define the entrance to the development and create a pleasant pedestrian environment.

Second Pre-Application Submission to WHBC

4.6 The second pre-application submission was submitted on 30th July 2020 and comprised:

- Cover Letter;
- Pre-Application Design and Access Statement;
- Pre-Application Planning Statement;
- Marketing Report - Existing Use; and
- Daylight and Sunlight Technical Note.

4.7 The revised proposals were presented to Clare Howe, Martin Ivatt and Maria Kitts on 19th August 2020 at a virtual meeting.

4.8 The second pre-application response letter was received on 10th September 2020 (Appendix 3).

Design Response to the Second Pre-Application

4.9 The following key design amendments were made in response to the second pre-application advice:

- **Scale/ Height** - Stepping down of height towards the south, with a 2-storey reduction in the tallest element of Block D and 1-storey reduction in its shoulder blocks;
- **Mansards** - Introduction of mansard roof forms, to reflect the those which are characteristic of the garden city;
- **Materiality** - Further refinements to scheme materiality to include red and white brickwork, metal projecting balconies, and tiled mansard facades with bronze coloured dormers;
- **Parking** - An increased parking ratio from 0.5 to 0.63 spaces per unit; and
- **Housing Mix** - Reduction in the number of 3 bed units and increase in the number of 1 and 2 bed units.

Pre-Application Design Workshop with WHBC and Place Services

4.10 Following the second pre-application meeting, an interim design workshop was held on 17th September 2020 to present the revised design proposals to Clare Howe and Martin Ivatt.

4.11 The key design revisions made following the design workshop comprised:

- **Scale/ Height** - Reduction in the height of Block C by 1-storey to 8-storeys;
- **Number of Units** - Reduced from 297 to 289 units;

- **Elevational Treatment** - Further work on the facades with simple brick detailing to provide depth and interest;
- **Layout** - The development of the site layout to incorporate refuse access, servicing and car club spaces;
- **Communal Amenity Space** - A significant increase in the area of proposed communal amenity space.

4.12 Following the positive feedback received at the design workshop, further technical work was carried out to develop the scheme in more detail. The landscaping proposals and SuDS strategy were developed together to integrate with the proposed site layout. In addition, sample testing was carried out to assess daylight and sunlight conditions within neighbouring developments and within the proposed development and shared amenity spaces.

Third Pre-Application Submission to WHBC

4.13 The third pre-application submission was sent to WHBC on 23rd October 2020 and comprised:

- Cover Letter;
- Pre-Application Design and Access Statement;
- Pre-Application Planning Statement;
- Landscape Strategy;
- Highways Technical Note;
- Heritage Strategy Update; and
- Daylight and Sunlight Technical Note.

4.14 The third pre-application response was received on 19th November 2020 (Appendix 4). Relevant extracts from the response are included in Section 6.0 of this Statement.

Design Response to the Third Pre-Application

4.15 The feedback on the design proposals at the third pre-application stage was generally positive, albeit with the recognition that the maximum height of the development would require robust justification as part of the planning application. The relatively minor amendments requested are reflected in the following changes to the scheme:

- **Security** - materials to the ground floor of Blocks F and G have been revised following feedback from the Secured by Design Officer to maintain the security of the new units;
- **Materials** - the mansard roofs are now proposed to have a cambered tile to give a textured appearance;
- **Fenestration** - minor amendments have been made to the fenestration of the flats in response to daylight and sunlight advice from Anstey Horne; and
- **Rainwater goods** - the rainwater goods strategy has been developed to show these would be integrated into the elevations.

Technical Pre-Application Consultation

- 4.16 The applicant team have engaged with Historic England, HCC (Highways) and HCC (LLFA) at pre-application stage and the advice of these statutory bodies has informed the scheme design development and the assessments undertaken in support of this planning application. The outcomes of the technical consultations are presented in the Heritage, Townscape and Visual Impact Assessment, Transport Assessment and Flood Risk and Drainage Strategy reports that are submitted in support of the planning application.

Public Consultation

- 4.17 Full details of the pre-application resident, community, and stakeholder consultation are provided in the Statement of Community Involvement, produced by Marengo Communications, and submitted in support of the application. The approach to public consultation was agreed with WHBC prior to its commencement, particularly considering the need to hold events online due to COVID-19 restrictions.
- 4.18 In summary, the consultation was carried out during November 2020 and involved the following activities:
- Stakeholder letter to local politicians;
 - Stakeholder letter to local community and heritage groups;
 - Community consultation newsletter to 2,032 residential and business addresses within a 525m radius of the site;
 - Bespoke consultation website;
 - Local newspaper press release raising awareness of the consultation event;
 - Distribution of a 'Consultation Pack'; and

- A range of feedback opportunities including an online and paper feedback form, project email address, Freephone number and a Freepost address.

4.19 The feedback received included favourable responses for the principle of redevelopment and regeneration of the site. While many supported the redevelopment of the site, the main areas of concern related to the scale of the design, parking, impact on local infrastructure, housing affordability and sustainability. These themes are considered by the application submission and a response to each is set out at Section 5 of the Statement of Community Involvement. The design response to the feedback is at Section 3.6 of the Design and Access Statement.

5.0 Development Proposals

5.1 It is proposed to demolish all existing buildings and redevelop the site to provide a high-quality residential development of 289 units with a community hub providing a gym and café. The development is proposed with public realm and open space, landscaping, access, associated car and cycle parking, refuse and recycling storage and supporting infrastructure.

5.2 A summary of the key characteristics of the proposals is provided below:

Quantum

- 289 units;
- 129 x 1-bed (44%); 126 x 2-bed (44%); 26 x 3-bed (9%); and 8 x 4-bed (3%);
- 29% M4(3) dwellings (10%) and the remainder M4(2) dwellings;

Scale and Height

- Transition in heights moving from south to north of the site;
- The maximum height of the proposed buildings is less than that of the existing building;
- The maximum spot height of the proposed building is 29.45 metres at the top of the roof parapet of Block A. This is 1.06 metres below the existing main building's stair core roof and 5.3 metres below the maximum height of the chimney flues;
- The massing is focused towards the western edge of the site towards the railway line;
- Blocks A&B - 6 to 9 storeys; Blocks C&D - 5 to 8 storeys; Block E - 4 to 7 storeys; Block F - 2 to 4 storeys; townhouses - 2 to 3 storeys;

Design and Layout

- 3 flatted blocks (Blocks A&B, C&D and E) in the northern part of the site arranged around landscaped courtyards;
- A smaller corner flatted block (Block F) which links the southern and northern parts of the site;
- 8 townhouses in the southern part of the site;

Amenity, Landscaping and Biodiversity

- 3,023 sqm of public open space;

- 800 sqm of communal amenity space for residents provided in roof terraces;
- Extensive landscaping including community lawn area, orchard hideaway, outdoor dining area, amphitheatre feature with dual attenuation drainage basin use; three doorstep play spaces, communal roof terraces, and green and brown roofs;
- Significant wildlife enhancements including new native and insect-friendly planting, results in a biodiversity net gain of nearly 800% compared to existing site conditions;
- 260 sqm of formal play areas;
- Each proposed unit has access to private amenity space, with 3,947 sqm of private amenity space distributed between the proposed units in the form of balconies, terraces and gardens;
- An average of 16.4 sqm of amenity space (communal and private) per unit;

Parking and Servicing

- A residential parking ratio of 0.76 spaces per unit;
- 226 parking spaces (including 219 residential spaces and 7 community hub spaces);
- 30 blue badge spaces across the site (29 residential and 1 community hub);
- Over 20% electric vehicle charging provision;
- 1 car club bay with active electric vehicle charging;
- 2 car parking spaces for each townhouse;
- 12 motorcycle spaces in the basement;
- A secure, covered long term cycle space for each unit (289 total);
- 10 long term and 8 short term visitor cycle parking spaces at surface level;
- 1 community hub long term cycle space within the unit;
- Refuse and recycling stores located within each core;
- Refuse collection by lorry from designated areas that are integrated into the public realm;
- Concierge in the community hub area;

Access

- Vehicular access via the existing access road (BioPark Drive) which is to be improved and will have a 4.8m wide carriageway and 3.1m wide footpath/ cycleway;
- No alterations proposed to the existing road junction between BioPark Drive and Broadwater Road;
- BioPark Drive splits within the site to access the northern and southern parts of the site;
and
- The opportunity for enhanced connectivity through pedestrian and cycle links connecting northwards to the Wheat Quarter and surrounding residential development to the west and south.

6.0 Planning Policy and Guidance

Development Plan

- 6.1 Under Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990, applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise.
- 6.2 The development plan comprises the Welwyn Hatfield District Plan (2005) – Saved Policies (2008).

Adopted Local Plan Policies

- 6.3 The relevant policies within the WHBC Local Plan are as follows:

- GBSP2 (Towns and Specified Settlements);
- SD1 (Sustainable Development);
- R1 (Maximising the use of Previously Developed Land);
- R2 (Contaminated Land);
- R3 (Energy Efficiency);
- R4 (Renewable Energy Sources);
- R5 (Waste Management);
- R10 (Water Conservation Measures);
- R11 (Biodiversity and Development);
- R18 (Air Quality);
- R19 (Noise and Vibration Pollution);
- R25 (Works to Listed Buildings);
- M1 (Integrating Transport and Land Use);
- M2 (Transport Assessments);
- M3 (Green Travel Plans);
- M4 (Developer Contributions);
- M5 (Pedestrian Facilities);
- M6 (Cycle Routes and Facilities);
- M14 (Parking Standards for New Development);
- IM2 (Planning Obligations);
- D1 (Quality of Design);
- D2 (Character and Context);
- D3 (Continuity and Enclosure);
- D4 (Quality of the Public Realm);
- D5 (Design for Movement);
- D6 (Legibility);
- D7 (Safety by Design);
- D8 (Landscaping);
- D10 (Public Art);

- D11 (Design Statements);
- H1 (New Housing Development);
- H6 (Densities);
- H7 (Affordable Housing);
- H10 (Accessible Housing);
- OS3 (Play Space and Open Space in Residential Development);
- EMP2 (Acceptable Uses in Employment Areas); and
- EMP3 (Mixed use Development at Broadwater Road West).

Other Material Considerations

6.4 Other key material considerations include:

- National Planning Policy Framework (2019) ("NPPF");
- National Planning Practice Guidance (2019);
- Planning for the Future White Paper (2020);
- Town and Country Planning Association ("TCPA") Garden City Principles (2020);
- Broadwater Road West Supplementary Planning Document ("SPD") (2008);
- Supplementary Design Guidance (2005);
- Parking Standards SPD (2004);
- Interim Car Parking and Garage Size Policy (2014);
- Planning Obligations SPD (2012); and
- Draft Local Plan Proposed Submission Document (2016)

Draft Local Plan

6.5 WHBC are in the process of producing a new Local Plan. The plan is at an advanced stage, having been submitted for Examination in May 2017. WHBC refer to the site as "Pea102" in the Examination documents. Within the Draft Local Plan Proposed Submission Document (2016), the northern part of the site is designated as part of the Broadwater Road West Mixed-Use Area (Figure 4), which is allocated for development comprising 1,020 homes and other uses including employment, housing, leisure and rail-related uses.

- 6.6 The Examining Inspector previously advised that the draft plan cannot be found sound as currently submitted because it does not meet the Objectively Assessed Need (“OAN”) for housing, which is around 16,000 dwellings. The draft plan currently identifies a need for 12,000 new homes. In response, WHBC assessed potential sites to meet the shortfall of at least 4,000 dwellings by commissioning further technical work, carrying out a call for sites consultation process and undertaking site assessments.
- 6.7 In January 2020, WHBC Councillors considered the Officers’ recommendation to bring forward new brownfield sites and remove 36 sites from the Green Belt for residential development allocation. The new allocations would enable the delivery of a total of 15,952 dwellings over the plan period. While the Council agreed to a consultation on some of these recommended sites, it also resolved to no longer support sites that were previously included in the submitted Regulation 19 draft Local Plan. Ultimately, Councillors voted for a strategy that would deliver a total of 14,011 dwellings.
- 6.8 In regard to the application site, Policy SP17 (Mixed use development site at Broadwater Road West), of the submission draft Local Plan (2016) states:

“The BioPark site will be retained in Class B1b use unless it can be demonstrated that it is no longer suitable for use as a research facility or it is reprovided elsewhere in Welwyn Hatfield.”

- 6.9 Despite this draft policy, as the Examination of the draft Local Plan has progressed, and in recognition of the need to allocate additional sustainably-located land for housing development, WHBC’s preferred use for the site has shifted from employment uses towards residential.
- 6.10 In the Local Plan Proposed Alterations - Additional Sites document (January 2020), which set out the WHBC Officers’ recommendations to Councillors, it is concluded that:

*“The University of Hertfordshire has confirmed its intention to close the facility and the site has been marketed for sale... The building is understood to need modernisation at considerable costs to attract life science occupants. Marketing evidence submitted indicates limited interest in the site for specialist B class users. On balance, it is considered that the specialist nature of the buildings and the investment requirement could make the site difficult to sell or let and **the contribution the site could make to housing land supply outweighs the loss of employment land.**” (Local Plan Proposed Alterations - Additional Sites, p.64) (added emphasis)*

- 6.11 Councillors agreed with this recommendation and put forward the site (Pea102) as a proposed new residential site allocation in the consultation for the proposed changes to the submitted draft Local Plan. The potential site capacity was calculated at 179 dwellings. On behalf of the applicant, hgh Consulting submitted representations (dated 3rd April 2020) to the consultation to express support for the proposed site allocation but also identifying a much greater development capacity and amendments to draft Policy SP17 (Mixed use development site at Broadwater Road West).
- 6.12 More recently, in November 2020, WHBC Councillors were asked to identify a new precise figure for the OAN over the draft Local Plan period, and, to meet the identified OAN figure, decide upon any changes to the site selection strategy that was agreed in January 2020.
- 6.13 Officers identified that Councillor's preferred sites strategy could now deliver 13,277 dwellings (c. 673 per annum over the plan period). In recognising WHBC's advanced pre-application discussions with the applicant on the Broadwater Gardens scheme, the Council included an assumption of increased capacity at the site from 179 to 250 dwellings. The Officers' Report noted that the assumed site capacity was slightly less than the 289 dwellings proposed at pre-application (and taken forward to the current planning application) due to the need to account for uncertainty. The Wheat Quarter completions assumption was similarly increased from 1,403 to 2,000 dwellings.
- 6.14 Councillors voted for a 13,800 dwelling (690 per annum) OAN figure and agreed to take forward the site selection strategy, including the increased housing capacity figure at the site. This was submitted to the Inspector for Examination as proposed changes to the submission draft Local Plan at the end of November 2020. This latest stance of WHBC regarding the site's recommended allocation in the emerging Local Plan is representative of the positive pre-application consultation with WHBC (details in Section 4 and Appendices 2-4), and WHBC's growing recognition that the site can support a residential development at a density that corresponds with its sustainable location.
- 6.15 In response to WHBC's submission of the OAN and proposed site selection strategy to the Examination, the Inspector wrote to WHBC in late November 2020 to advise that WHBC's decision to submit multiple OAN figures will lead to inevitable delays to the Examination timetable. The Inspector re-emphasises that the OAN figure before the Examination is 16,000 dwellings and that the deadline to submit details of additional sites to meet this figure is the end of 2020. It is anticipated that the Examination hearing sessions will recommence at the start of 2021.

Draft Local Plan Policies

6.16 Key relevant policies in the submission draft Local Plan (2016) are as follows:

- SP1 (Delivering Sustainable Development);
- SP2 (Targets for Growth);
- SP3 (Settlement Strategy and Green Belt Boundaries);
- SP4 (Transport and Travel);
- SP7 (Type and Mix of Housing);
- SP9 (Place Making and High Quality Design);
- SP10 (Sustainable Design and Construction);
- SP12 (Strategic Green Infrastructure);
- SP13 (Infrastructure Delivery);
- SP15 (The Historic Environment of Welwyn Garden City);
- SADM2 (Mixed-use Development Site at Broadwater Road);
- SADM3 (Sustainable Travel for All);
- SADM10 (Employment Development);
- SADM11 (Amenity and Layout);
- SAM12 (Parking, Servicing and Refuse);
- SADM13 (Sustainability Requirements);
- SADM14 (Flood Risk and Surface Water Management);
- SADM15 (Heritage);
- SADM16 (Ecology and Landscape);
- SADM18 (Environmental Pollution); and
- SADM21 (Housing Allocations in Welwyn Garden City).

Broadwater Road West SPD

6.17 The Broadwater Road West SPD (2008) seeks to set out a framework for the sustainable regeneration of the Opportunity Area. With regard to the site, the SPD says:

“The BioPark buildings located in the south western corner of the site are occupied by the University of Hertfordshire and provide a unique facility for bioscience and health technologies. The SPD does not therefore propose the redevelopment of this part of the site as it recognises the economic development potential of the facility for the town, which should be supported through the redevelopment of the rest of the land.”

- 6.18 The SPD, which was adopted in 2008, is outdated. It does not account for WHBC's current stance towards the preferred use for the site for residential (indeed the site is excluded altogether from the SPD's redevelopment proposals), the recent context of emerging development within the Opportunity Area, nor the change in ownership and use of the site.
- 6.19 For example, in terms of surrounding development, the SPD seeks 19,000sqm of B1 floorspace within the Opportunity Area, however, the 2019 permission for the Wheat Quarter site, which makes up the large majority of the Opportunity Area, was approved with only c. 6,000sqm of B1 floorspace and a higher proportion of residential units. The SPD seeks active frontages at ground floor throughout the Wheat Quarter site, however, the majority of buildings approved in the south site have residential uses and car parks at ground floor. The height and density of the Wheat Quarter (5-9 storeys and a net density of 201dph) also exceeds the 5 storey and 75dph guidelines in the SPD.
- 6.20 The SPD identified the listed Roche Products factory as suitable for conversion to community, cultural, office or hotel uses, however, the residential conversion of the building was approved in 2018 and is now underway. Although active uses are sought by the SPD at ground floor in the northern part of the Roche Products site, the completed development is residential only.
- 6.21 While the design proposals account for the parts of the Broadwater Road West SPD that can be considered to remain relevant, as illustrated by the examples given above, the fundamentals and thrust of the SPD have diminished over time and the SPD has reduced in relevance as development has come forward within the Opportunity Area. Accordingly, the weight that can be afforded to the SPD has reduced significantly and will increasingly do so as the draft Local Plan progresses through the final stages of Examination towards adoption.

7.0 Planning Assessment

7.1 This Section provides an assessment of the proposed development against the relevant planning policies and any other material considerations of importance to the decision-making process. The key planning considerations relevant to the proposed development are as follows:

- (a) Principle of development;
- (b) Townscape and heritage assets;
- (c) Urban design;
- (d) Residential amenity;
- (e) Housing tenure and mix;
- (f) Highways, access and parking;
- (g) Landscaping and biodiversity;
- (h) Flood risk and drainage; and
- (i) Energy and sustainability.

Principle of Development

Policy Context

7.2 **Part 5** of the NPPF sets out the Government's commitment to significantly boost the supply of new homes. **Paragraph 59** highlights the importance of a sufficient amount and variety of land coming forward for development where it is needed. **Part 9** of the NPPF seeks to promote sustainable transport. **Paragraph 103** focuses significant development towards sustainable locations with existing transport infrastructure, where the need to travel is limited and a genuine choice of transport modes are available. **Part 11** of the NPPF sets out the plan's strategic objectives for making effective use of land, including making as much use as possible of previously developed land (**Paragraph 117**). **Paragraph 118** states that substantial weight should be given to the value of using suitable land within settlements for homes and gives support for the development of under-utilised land, particularly where this would help meet identified needs for housing where land supply is constrained and available sites could be used more effectively.

- 7.3 The recent **Planning for the Future (2020)** publication re-emphasises the Government's commitment to encouraging greater building in urban areas and densifying development around public transport hubs to make the best use of brownfield land, particularly to support housing development.
- 7.4 At **Paragraph 4.5** of Local Plan (2005), one of the main objectives is to concentrate development into the district's main towns such as Welwyn Garden City. **Policy R1** (Maximising the Use of Previously Developed Land) says that the Council will require development to take place on land which has been previously developed. The site is designated with Employment Area EA1 (Welwyn Garden City Industrial Area) under **Policy EMP1** (Employment Areas) and **Policy EMP2** (Acceptable Uses in Employment Areas) says that proposals for uses other than B class uses will generally be resisted unless it can be demonstrated that the site is not required to meet future employment requirements and business needs. **Policy EMP3** (Mixed Use Development Site at Broadwater Road West) defines the Opportunity Area for planned regeneration for mixed use development comprising primarily employment, housing, leisure and rail-related uses.
- 7.5 **Policy SP1** (Delivering Sustainable Development) of the submitted draft Local Plan (2016) seeks to increase the supply of housing in the district. The policy advises that new development should be located where it delivers a sustainable pattern of development which prioritises the use of previously developed land. The policy directs growth to areas with good transport and service accessibility. **Policy SP2** (Targets for Growth) sets out the housing target of 12,000 dwellings over the plan period. However, this target has become outdated in the context of the Examining Inspector's conclusion that the Plan would not be found sound unless it is revised to meet the district's Objectively Assessed Need of around 16,000 dwellings.
- 7.6 **Policy SP3** (Settlement Strategy) of the Draft Local Plan says that Welwyn Garden City will be a primary focus for new development to reinforce its role as the district's principal centre for economic activity. Draft **Policy SADM1** (Windfall Development) sets out that planning permission for residential development on unallocated sites will be granted provided:
- i. *"The site is previously developed, or is a small infill site within a town or excluded village. In the Green Belt, Policy SADM 34 will apply;*
 - ii. *The development will be accessible to a range of services and facilities by transport modes other than the car;*
 - iii. *There will be sufficient infrastructure capacity, either existing or proposed, to support the proposed level of development;*

iv. Proposals would not undermine the delivery of allocated sites or the overall strategy of the Plan; and

v. Proposals would not result in disproportionate growth taking into account the position of a settlement within the settlement hierarchy.”

- 7.7 The draft policy adds that windfall sites will also be supported where the proposed development would support communities through the provision of community facilities to meet the demand for new or enhanced community services.
- 7.8 Draft **Policy SP17** (Mixed Use Development Site at Broadwater Road West) allocates Broadwater Road West for development to accommodate approximately 1,020 new homes and other uses included employment, housing, leisure and rail-related uses. The policy seeks to create a sustainable neighbourhood with an appropriate mix and density of uses for its central location. As Policy SP17 is currently drafted, the site itself is to be retained in Class B1b use unless it can be demonstrated that it is no longer suitable for use as a research facility or it is reprovided elsewhere in the district. Notwithstanding, since the draft policy was published, WHBC have subsequently reconsidered the site’s planned future land use to recommend that the site is allocated for residential development (with an indicative capacity of 250 dwellings). This recommendation has been submitted to the Examination and forms an important material consideration in the determination of this application.
- 7.9 It is noted in the latest Annual Monitoring Report (2018-19) that the borough’s housing land supply is 2.34 years. In this housing supply context, the pre-application responses from WHBC (Appendices 3 and 4) confirm that the planning balance for this planning application would be undertaken in favour of sustainable development. In terms of housing delivery, the latest Housing Delivery Test figure (2019) reports that only 71% of the borough’s annual housing requirement has been delivered over the past three years.

Scheme Assessment

- 7.10 Although there is an emerging policy justification to support the principle of residential redevelopment of the site (refer to Paragraphs 6.5-15 and 7.8), the adopted District Plan policies seek to retain the site as a Research and Development site (class B1b) and the proposals must be assessed against the adopted policies.

7.11 The former owners of the site, the University of Hertfordshire, undertook a marketing exercise which is detailed in the Marketing Report (February 2019) submitted in support of the planning application. Section 6.2 of the report outlines the three-pronged approach to marketing the site, using:

1. The marketing team of the long term leaseholder at the time of writing the Marketing Report (BPHL);
2. Letting agents; and
3. Direct selling.

7.12 The Marketing Report finds that the BioPark facility is unlikely to be sustainable due to the following key reasons:

- The building requires refurbishment, particularly the M&E plant which is beyond its life expectancy, inefficient, expensive to run and prone to break down. It is estimated that the necessary costs to replace the services would be £24.85 million, excluding any cosmetic improvements or reconfiguration;
- The University confirmed that BioPark would run at a loss even with full occupancy and without taking into account any capital expenditure;
- The report considers that BioPark fails to provide the qualities of a successful tech environment. The report observes that the tech market is polarising towards established clusters and, as an isolated single building BioPark does not provide the clustering and other elements that tech occupiers require; and
- Even with the hypothetical assumption of a totally refurbished building, the report considers that BioPark is likely to fail because of the fundamental problems of 1) wrong location and 2) lack of demand.

7.13 The report demonstrates that the BioPark premises is no longer suitable for B1b use, principally due to its need for modernisation and its location does not meet the requirements of the Research and Development industry, and is therefore unlikely to succeed in its current use. The agents who were responsible for marketing the property comment that the fundamental problem in letting BioPark is the lack of demand. The report adds that it is not viable to risk the expenditure to refurbish the building as there is no guarantee that it would generate significant new demand.

- 7.14 The University followed the report recommendation that the most viable option would be to dispose of the site for residential redevelopment or conversion and the applicant has since acquired the site. The facility is currently vacant. The submitted marketing evidence shows that the proposal meets the requirements of **Policies EMP1** (Employment Areas), **EMP2** (Acceptable Uses in Employment Areas) and **EMP3** (Mixed Use Development Site at Broadwater Road West) of the District Plan.
- 7.15 The site's designation within the Broadwater Road West Opportunity Area is a further key consideration in assessing the principle of development. The wider Opportunity Area is allocated for mixed use development in the adopted Local Plan and draft Local Plan and is the subject of the Broadwater Road West SPD (2008). Recently approved and completed residential-led developments within the Opportunity Area have contributed to the changing character of this former industrial area.
- 7.16 To the north of the site is the former Shredded Wheat Factory. In November 2017, planning permission was granted (ref. N6/2015/0294/PP) for a residential-led mixed-use development of 805 units and c. 14,000sqm of commercial and community floorspace. Permission was granted (ref. 6/2018/0171/MAJ) in February 2019 for the redevelopment of the site to create the 'Wheat Quarter'; a residential-led mixed-use quarter including 1,340 dwellings, community uses, office and retail space. Whilst no planning application has been submitted at the time of writing, there are ongoing pre-application discussions with WHBC and site promoters regarding proposals to increase the development capacity of both parts of the Shredded Wheat site. In October 2020, the promoters of the "South Side" of the Wheat Quarter site, Metropolitan Thames Valley, conducted public consultation on proposals to increase the number of dwellings from 435 to 747 in blocks of up to 11 storeys in height. It is understood that a planning application for the development is expected in early 2021.
- 7.17 To the west of the site is the former Roche Products site. Planning permission (ref. N6/2010/1776/MA) was granted in March 2011 for the redevelopment of the site to provide 209 residential units. The heights across the site range from 2 to 4 storeys. This development has since been developed by Taylor Wimpey. The Roche building, which is listed, is also undergoing conversion for 34 residential units (ref. N6/2016/1882/FUL) having received planning permission in October 2018.
- 7.18 Within the current context of growing housing need and a shortage of available land, and the under-delivery of housing in recent years, WHBC's proposed changes to the submitted draft Local Plan now include the site as a residential site allocation (refer to Paragraphs 6.5-15). In addition, WHBC have recently increased the housing capacity of the site's proposed allocation. The proposed changes to the draft Local Plan are to be submitted to the Examination and are due for consideration in early 2021.

- 7.19 The proposals respond to this context to propose a residential scheme which will deliver 289 units that will make a significant contribution to WHBC's housing targets (approximately 2% of the latest Objectively Assessed Need figure put forward by members). The proposals will complement the established and emerging mix of uses within the Opportunity Area, with the redevelopment of the site representing a key piece of the development 'jigsaw' in this area of Welwyn Garden City. The proposed residential uses connect in with those in the Wheat Quarter and Roche site developments to the north and west, and the aspiration is to enhance pedestrian accessibility in these directions to connect to the town centre and rail station.
- 7.20 The development would provide greater footfall to the approved commercial uses within the Wheat Quarter, as well as established uses in Welwyn Garden City town centre. The increased activity and spending would encourage economic growth through the multiplier effect and, ultimately, the proposals would enhance the vitality and viability of these centres.
- 7.21 The site's location, within walking distance of the train station, town centre and other services and available public transport options, supports the densification of development in this location to make the best use of the highly sustainably-located and accessible site. Full baseline transport conditions are included in Section 3 of the application Transport Assessment.
- 7.22 The site is walkable from the train station and town centre via Broadwater Road (18-minute walk / under a mile). This travel distance would considerably shorten should new residents use the direct pedestrian access through the Wheat Quarter site. It is also worth noting the recent refurbishment of the footbridge (WHBC planning ref. 6/2016/0457/FULL) which connects the Broadwater Road West Opportunity Area to the train station.
- 7.23 The principle of residential development is fully supported by the Government's latest thinking on sites such as these. The Planning for the Future White Paper re-emphasises the Government's commitment to intensifying the use of urban land for housing delivery around public transport hubs.
- 7.24 Moreover, urban locations in the wider South East are performing a greater role in addressing London's housing crisis by providing more affordable locations for people commuting to London. This is underpinned by the Secretary of State's letter (March 2020) regarding the draft New London Plan, which urges the Mayor of London to produce and deliver a new strategy with authorities in the wider South East to offset the capital's unmet housing need in a "joined-up way". This request is reinforced in the Secretary of State's follow-up letter in December 2020. Meeting this demand from the capital increases the pressure on housing supply within places like Welwyn Garden City and puts a greater reliance on the capacity of sites within easy access train rail stations, such as BioPark, to deliver housing.

- 7.25 Furthermore, the site is immediately available, being in the sole ownership of the applicant. The applicant has confirmed that it could be developed within a five year period. It is planned to build out the proposed development in a single phase over a 2 year period. The resultant housing trajectory would average at 144.5 units per annum. This demonstrates the ability of the site to deliver housing and contribute to WHBC's vision for the Opportunity Area in the short term. In accordance with the NPPF definitions (NPPF, Annex 2: Glossary), the site is Deliverable and Developable.
- 7.26 While the site is recommended for allocation in the draft Local Plan (2016), the proposed development also meets the criteria of draft Policy SADM1 (Windfall Development). The site is previously developed land located within the district's main town in an accessible location where existing and planned infrastructure can support the proposed level of development. The proposal has been planned to integrate with the Wheat Quarter to the north and will not undermine the delivery of this site.
- 7.27 To conclude on the principle of development, the existing facility is no longer fit for purpose, is in the wrong location for B1b uses and thus there is a lack of demand for the building in its existing use. Overall, the proposals optimise the quantum of residential development that would be delivered on the site and are in line with national and local policy objectives to reuse previously developed land and protect Green Belt areas elsewhere in the district. The development responds to the emerging context of the proposed housing allocation in the draft Local Plan and recently approved schemes within the Broadwater Road West Opportunity Area. The development would contribute to the emerging local mixed-use community and form a key element of the regeneration of the important Broadwater Road West area. It would support the vitality of Welwyn Garden City and boost the much-needed housing supply of the district.

Townscape & Heritage Assets

Policy Context

- 7.28 **Paragraph 193** of the NPPF requires that great weight is given to the conservation of assets, irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance. The more important the asset, the greater the weight should be afforded to the asset's conservation.
- 7.29 **Policy SADM15** (Heritage) of the draft Local Plan sets out that proposals should respect the setting of heritage assets in terms of design, scale, materials and impact on key views. **Policy SP15** (The Historic Environment of Welwyn Garden City) echoes this policy objective and says that development proposals should respond to the key historic character and significance of the Garden City.

- 7.30 The Broadwater Road West SPD says that “*lower rise buildings should generally be accommodated at the southern end*” of the Opportunity Area. It adds that, given the context of the listed buildings, it is generally considered that buildings should not be more than 5 storeys in height. The SPD advises that new development should not adversely affect the landmark role of the Shredded Wheat silos within the skyline. Where new build development is proposed of 5 storeys or more, then the resulting scheme will be assessed with regards to both the benefits that the increased height could bring and any adverse impacts.

Scheme Assessment

- 7.31 Bidwells have produced an HTVIA to assess the application proposals in the context of the surrounding historic environment and townscape.

Heritage

- 7.32 At Section 8, the HTVIA assesses identified designated heritage assets in terms of their significance, sensitivity, and the overall contribution of the existing BioPark site to their setting. It finds that the site currently makes a negative contribution to the setting of the Shredded Wheat Factory, Former Roche Officer Building and Welwyn Garden City Conservation Area. The site currently makes a negligible contribution to Hatfield House and its Park and Garden.
- 7.33 An assessment of the effect of the proposed development on heritage assets must account for the baseline position of the significant scale and massing of the existing buildings on site. The maximum height of the proposed buildings is less than that of the main existing building, with the maximum spot height of the proposed development being 29.45 metres at the top of the roof parapet in Block A’s 9 storey element. This maximum proposed building height is 1.06 metres below the height of the existing building’s stair core roof and 5.3 metres below the building’s chimney flues. In terms of massing and layout, the footprints and massing of the proposed apartment blocks are shown compared to a wireframe of the existing building on Page 71 of the Design and Access Statement and reproduced in Figures 9 and 10.



Figure 9: Existing (red outline) and proposed building footprints



Figure 10: Existing and proposed building massing from the south-west (above) and south-east (below)

- 7.34 As shown in Figures 9 and 10, the blocks are sited to concentrate taller elements of the development in areas currently occupied by the bulk of the existing main building. This design response creates the capacity to accommodate the proposals whilst providing a betterment in heritage and townscape terms, by introducing a high-quality architectural response to the site’s distinctive townscape setting, and a betterment to the existing monolithic building by breaking up the massing on site.
- 7.35 The assessment of the impact of the proposals upon heritage assets, presented at Paragraphs 10.17 to 10.20 of the HTVIA, is informed by viewpoints agreed with Place Services. The assessment finds that the proposals will retain existing views of the Shredded Wheat Factory and Former Roche Office, whilst improving the backdrop of the views with a more responsive design which reflects the architectural quality of the listed buildings. Overall, the proposals would have a moderate beneficial impact upon the wider setting and significance of the listed buildings.

- 7.36 It is considered that the Broadwater Road West SPD intention to avoid buildings over 5 storeys due to the presence of the listed buildings is superseded by the HTVIA which has demonstrated that the capacity exists in heritage terms for the proposed development of 2-9 storeys to result in a beneficial impact on the listed buildings. Furthermore, the HTVIA finds that the proposals retain the prominence of the listed Shredded Wheat Factory and silos as the primary structure within the historic industrial zone.
- 7.37 Regarding the Welwyn Garden City Conservation Area, a moderate beneficial impact of the proposals is also found due to the opportunity to replace the existing buildings on site which are of an indifferent architectural quality with new buildings which reflect the historical importance of the Welwyn Garden City industrial zone. The existing buildings have a negative impact which is amplified in long-range views of the site within the Conservation Area.
- 7.38 Due to the considerable distance from the site, the HTVIA concludes that the impact of the proposals upon long-range views from the Grade I listed Hatfield House and Grade I registered Hatfield House Park and Garden is neutral.

Townscape

- 7.39 In terms of townscape context, Paragraphs 11.8-10 of the HTVIA provide a summary:

*“The site has been found to be a **located in a low sensitivity area, with historic and ongoing redevelopment, removing much of the original character** of the Site and immediate surroundings. This contrasts with the majority of Welwyn Garden City, with the carefully orchestrated historic planned townscape still appreciable.*

*As a result of the historic ‘zoning’ of the city, the site and immediate surroundings have an **appreciably distinct character from that of the wider townscape**. Following the decline of industry within the town centre, the site and surroundings to the north have been allocated for redevelopment and a detailed Supplementary Planning Document outlines the original development strategy for the area to the north, which has now been partially enacted.”*

7.40 At Section 9, the HTVIA assesses the townscape character areas surrounding the site and the potential of these areas to be affected by the proposals. This part of the assessment is based on viewpoints that have been agreed at pre-application stage with Place Services. The existing site is assessed as making nil contribution to the majority of the defined character areas, with a neutral contribution found to the Parkway Commercial Town Centre and Peartree modern business area, and a negative contribution to Chequer Park Lane, Longcroft Lane, Industrial Zone, and Broadwater Crescent Character Areas.

7.41 The townscape impact of the proposals on the Character Areas and views is assessed as ranging from a neutral to substantial beneficial impact. Overall, a minor beneficial impact is found and the report concludes:

*“The proposals have been found to alleviate the hostile and indifferent present character of the site, providing a **responsive development that seeks to create a resolved sense of place** which will establish a **high quality architectural development** that appears cohesive with the consented development to the north.”*
(Paragraph 11.6, HTVIA)

7.42 The HTVIA concludes:

*“The proposals are considered to **respect and enhance the town centre’s distinctive townscape character and historic environment**, responding to local context, scale and character... We therefore find no reason in heritage or townscape terms why the council should not view this application favourably.”* (Paragraph 11.8, HTVIA)

7.43 The proposals therefore comply with townscape and heritage guidance within the NPPF and Policies **SADM15** (Heritage) and **SP15** (The Historic Environment of Welwyn Garden City) of the draft Local Plan.

Urban Design

Policy Context

7.44 **Paragraph 122** of the NPPF gives support for development that makes efficient use of land. **Paragraph 123** says that, where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important to avoid homes being built at low densities and ensuring that developments make optimal use of the potential of each site. **Paragraph 123a)** explains that local planning authorities should seek a significant uplift in the average density of residential development in town centres and locations well served by public transport.

7.45 **Paragraph 124** of the NPPF emphasises that good design is a key aspect of sustainable development and the creation of high quality buildings and places is fundamental to what the planning and development process should achieve. The NPPF’s design objectives are set out at **Paragraph 127**, and seek to ensure that developments:

- (a) *“will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
- (b) *are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
- (c) *are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*
- (d) *establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*
- (e) *optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*
- (f) *create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.”*

7.46 The Local Plan seeks to ensure the highest quality of design in new development (**Policy D1** Quality of Design), and that new development respects and relates to local context and character (**Policy D2** Character and Context). New development should either create or enhance public areas and the public realm (**Policy D4** Quality of the Public Realm) and enhance and contribute to the legibility of the area (**Policy D6** Legibility).

7.47 **Policy H6** (Densities) of the Local Plan states that ‘...In central areas and areas with good accessibility by modes of transport other than the car, residential development will be expected to be close to or exceed 50 dwellings per hectare provided that the development will not have an adverse impact on the character of the surrounding area and can satisfy the design policies of the plan.’ The Broadwater Road West SPD states that density within the area should be approximately 75 dwellings per hectare.

- 7.48 **Policy SP9** (Place Making and High Quality Design) of the draft Local Plan says that higher density development will be encouraged in accessible locations, such as around transport hubs or town centres, where this is appropriate.
- 7.49 The Broadwater Road West SPD advises that buildings should be of excellent architectural quality, and “*lower rise buildings should generally be accommodated at the southern end*” of the Opportunity Area. Where new build development is proposed of 5 storeys or more, the SPD applies broad design principles against which any such proposal shall be assessed:
- Relationship to context of the site and the wider area;
 - Effect on historic context of the site and the wider area;
 - Relationship to transport infrastructure;
 - Architectural quality of the building;
 - Design credibility of the building;
 - Sustainable design and construction;
 - Contribution to public space and facilities;
 - Effect on the local environment and amenity of those in the vicinity of the building;
 - Contribution to permeability; and
 - Provision of a well designed environment including fitness for purpose.

Scheme Assessment

- 7.50 As supported by the conclusions of the HTVIA, the proposed high quality, sensitively-designed new buildings enhance the townscape environment while proposing an appropriate quantum and mix of development. The HTVIA concludes that the site is capable of accommodating larger buildings than 5 storeys, a finding that reflects the baseline position of the existing 5 storey building. Due to the large floor to ceiling heights, the main BioPark building is 34.75 metres in height to the top of the chimney flues and 30.5 metres in height to the rooftop of the stair core. The maximum height of the development is now less than the existing BioPark building by 1 metre from the stair core roof and 5.3 metres below the chimney flues.

7.51 In respect of **Policy H6** (Densities) of the adopted Local Plan, it is considered that the policy does not reflect the current housing need situation in Welwyn Hatfield, nor does it reflect more recent national planning guidance, or the specifics of the site’s location and accessibility. Instead it corresponds with the prevailing low density of housing in the borough. The Broadwater Road West SPD density policy is similarly dated and did not consider the site. It is notable that draft **Policy SP9** (Place Making and High Quality Design) recognises that higher densities are appropriate in accessible locations near transport hubs or town centres. These material considerations justify the departure from the adopted Local Plan and Broadwater SPD policies. It is considered the proposal is of an appropriate density that combines the efficient use of land with high quality design and reflects the site’s accessible location near to the train station and town centres. This is recognised in the third WHBC pre-application response, which states:

*“Given the sustainable location of the site, **higher density development is acceptable in principle** in this location, subject to satisfying design policies and the SPD.”* (Added emphasis) (Page 3, Appendix 4).

7.52 As noted above, it is considered that the Broadwater Road West SPD is dated. Its advice that the south of the Opportunity Area should generally accommodate low rise buildings is not consistent with adopted national design guidance, which emphasises optimising the potential of sites to deliver homes at higher densities. Nor does it consider the redevelopment of the site, instead signalling its retention in its current form and use, and thus its baseline position of a tall building with a large mass. This underpins the assessment of the scheme in line with the criteria listed in the SPD, which is addressed in Table 1 on the following pages.

SPD Design Principle	Scheme Response
Relationship to context of the site and the wider area	The massing has been distributed sensitively and appropriately across the site, so as to promote optimum light penetration and views outwards. The existing bulk has been pulled away from the housing to the southeast of the site and lower mass has been positioned in its place. The design proposals have evolved through a context study (Section 2.0 of the Design and Access Statement) of surrounding existing and emerging architecture in the Garden City.
Effect on historic context of the site and the wider area	The proposals have been fully assessed in terms of their effect on the historic environment. The HTVIA finds that the proposals would have a moderate beneficial impact upon the wider setting and significance of the nearby listed buildings, and a moderate beneficial impact upon the Welwyn Garden City Conservation Area.

<p>Relationship to transport infrastructure</p>	<p>The proposed development makes the most efficient use of the previously developed site, reflecting the its accessible location under a mile in distance from the train station and town centre. The development includes the enhancement of the currently private access road (BioPark Drive) to create a welcoming approach to the development. The proposals present the opportunity to enhance connectivity within the Garden City and Broadwater Road West Opportunity Area by providing pedestrian and cycle routes to the north to the Wheat Quarter and to adjacent residential development to the east and south. The proposals seek to encourage sustainable modes of travel through the provision Electric Vehicle Charging Points (equipped to more than 20% of parking spaces), a car club bay, and resident and visitor cycle parking.</p>
<p>Architectural quality of the building</p>	<p>The proposals will improve the aesthetic quality of the site, introducing well designed architecture which is complemented by extensive landscaping and will appear cohesive with the consented Wheat Quarter development to the north. The surrounding area’s industrial heritage and broader Garden City typologies are used as cues for the form, layout, character and materiality of the proposals. The design is reflective of locally distinct architecture and will contribute to an enhanced sense of place in the evolving Broadwater Road Opportunity Area.</p>
<p>Design credibility of the building</p>	<p>The proposed buildings have been designed by an experienced architectural practice and correspond with the core design principles of the NPPF. The planning application is supported by robust design justification in the Design and Access Statement.</p>
<p>Sustainable design and construction</p>	<p>The application is supported by an Energy Statement which outlines the scheme’s approach to energy savings in line with Policies SP1, SP10 and SADM13 of WHBC’s draft Local Plan. In accordance with the energy hierarchy, the proposals take a fabric-first approach complemented by renewable energy technologies to achieve savings of 12.86% (residential) and 13.86% (non-residential) against Building Regulation baseline emissions rates.</p> <p>Water efficiency measures will be incorporate to restrict consumption to less than 110 litres per person a day.</p> <p>Waste management and resource minimisation is secured by the submitted Site Waste Management Plan.</p>
<p>Effect on the local environment and amenity of those in the vicinity of the building</p>	<p>The visual amenity of the site will be improved by the proposed removal of the unsightly and monolithic building and redevelopment to provide sensitively designed buildings which incorporate locally distinct architectural elements to enhance the sense of place. Landscaping forms an integral part of the overall design proposals and will further improve</p>

	<p>the visual amenity of the site. Two thirds of the site is proposed as open space which will be publicly accessible and provide a key benefit for those in the vicinity of the site.</p> <p>The design has been developed in line with daylight and sunlight testing. A Daylight and Sunlight Report is submitted in support of the planning application which assesses the potential impact on neighbouring properties. The findings show that the vast majority of neighbouring properties will meet BRE guideline daylight and sunlight values. It is also worth noting that a number of properties will experience better daylight and sunlight levels as a result of the scheme.</p>
<p>Contribution to permeability</p>	<p>The proposals will break up the massing on site, which currently presents a barrier to movement, to significantly enhance permeability within the site. The public realm proposals, including the introduction of central courtyards and pedestrian route improvements, will encourage movement through the Opportunity Area and Garden City. The scheme presents the opportunity for north/south pedestrian and cyclist connections between the site and town centre via the Wheat Quarter, as well as the potential for enhanced connectivity to surround existing residential development.</p>
<p>Provision of a well designed environment including fitness for purpose</p>	<p>All proposed units meet or exceed space standards and future residents would benefit from ample amenity space provision. The number of dual or triple aspect units has been maximised to ensure favourable outlook and levels of daylight and sunlight would be achieved. The proposals include appropriate open space, parking and servicing provision to ensure that the development would be fit for purpose and support a high standard of amenity for future residents.</p>

Table 1: Assessment of the proposals against the Broadwater Road SPD (2008)

7.53 The scheme significantly improves the visual appearance of the site, replacing the existing monolithic building with new massing which is stepped in height towards the south (Figure 11) to respect the scale of the listed Roche building, the landmark qualities of the silos and the residential buildings to the south. By breaking up the built form on site and shifting the bulk of the proposed buildings towards the less-sensitive western and northern boundaries, the proposals are a significant improvement on the siting and layout of the existing buildings. At Page 3 (Appendix 4), the third pre-application response confirms that the proposed buildings are anticipated to contribute more positively to the skyline than the existing buildings. The breaking up of massing increases permeability through the site as well as light penetration, particularly to the recently completed residential development on the former Roche products site to the east. This is verified by the application Daylight and Sunlight Report, which finds that a number of neighbouring properties would experience an increase in daylight and/or sunlight availability as a result of the proposals.

- 7.54 The opportunity is taken to use the spaces created between buildings to introduce landscaped public courtyards within a wider new public realm. A gym or café is proposed at ground floor in Block E which opens out onto the main courtyard to create a welcoming community hub environment. The enhanced permeability will open up views through the site and pedestrian accessibility through the Opportunity Area.
- 7.55 The scheme uses the area’s industrial heritage as a cue for form, character and identity and seeks to enhance the sense of place by responding to the surrounding local distinctiveness. A further key driver of the design proposals has been the TCPA’s Garden City Principles for the 21st Century (2020) to ensure the proposals realise the objective of providing beautifully and imaginatively designed homes which are complemented by attractive green spaces for the local community. A context study of architecture in proximity to the site and broader Garden City design principles is included in Section 2 of the Design and Access Statement.



Figure 11: Visual of the proposed scheme from the southeast showing the transition in heights downwards from north to south

7.56 The context study explores the traditional Garden City typology found in local buildings including those on Parkway, where there is a predominance of mansard roofs, red brick and stone plinths. In addition, the site's context within the former industrial zone of the Garden City, including the former Roche products buildings and industrial art deco aesthetic, have been considered and reflected in the proposals, particularly on the approach to the development from BioPark Drive (Figure 12) with Block F which is a feature corner building that joins the southern and northern parts of the site, and the visible stair core within Block E. The materiality and landscaping ethos of the recently approved Wheat Quarter development forms another key precedent for the proposals.



Figure 12: Visual of Blocks F and E from BioPark Drive

7.57 These design principles have been refined throughout the pre-application consultation process. Reflecting this, the materiality of the scheme was welcomed by Officers in the third pre-application response:

*“The proposed material palette overall is considered to be **high quality and a positive response** to the traditional materials used in Welwyn Garden City. The proposed treatment to the contemporary reflection on mansard roofs (as a dominant architectural feature in the Garden City) are also **positive, well-articulated and will offer something unique to the town** and a **high level of design aspiration** and intent for future developments in the area.” (Added emphasis) (Page 3, Appendix 4)*

7.58 The design proposals would create a high quality development through sensitive densification which relates to the context of the site and wider area and responds to the site's accessibility. At the third pre-application meeting, Officers welcomed the quality achieved by the proposals and the significant improvements to the scale, massing and composition of the buildings during the pre-application process. There are clear benefits that the design will bring to site's urban context against the baseline position. The proposals therefore fully accord with the objectives of the NPPF and local design policies.

Residential Amenity

Policy Context

7.59 **Paragraph 127f)** of the NPPF states that development should promote health and well-being and achieve a high standard of amenity for existing and future users.

7.60 **Policy SADM11** (Amenity and Layout) of the draft Local Plan requires that all proposals create and protect a good standard of amenity for buildings and external open space, in terms of sunlight and daylight levels, privacy, outlook, visual amenity and ensuring that new development is not overbearing. External private and communal garden space should meet the reasonable needs of its users in its extent and design. All dwellings should meet the Nationally Described Space Standards.

7.61 Draft **Policy SP17** (Mixed Use Development Site at Broadwater Road West) advises that development in the Opportunity Area should incorporate open space in accordance with the principles in the Broadwater Road West SPD. Draft **Policy SP9** (Place-making and High Quality Design) seeks an appropriate amount of public open space within development that is well sited and designed to help create and enhance a sense of place.

Scheme Assessment

Future Residential Amenity

Internal Standards

7.62 A high standard of future residential amenity is provided by the proposals. All units meet or exceed Nationally Described space standards. The development layout seeks to maximise the number of double or triple aspect units. The number of north-facing single aspect units has been minimised, and there are no north-facing single aspect units that are not provided with secondary smaller window(s) facing another aspect. A minimum 21 metre separation distance is retained between facing elevations of the proposed apartment blocks.

Amenity Space

7.63 Ample amenity spaces are provided within the scheme to support a high standard of living for future occupants, including private amenity space, communal roof terraces and public open space. A schedule of the amenity areas being provided is shown at Table 2 below:

Amenity Type	Area m²
Private amenity space (total)	3,947
Residents' communal amenity space (roof terraces)	800
Average amenity space per unit (private and communal)	16.4
Public open space	3,023

Table 2: Amenity Space Schedule

7.64 Useable private amenity space is proposed for all units in the form of balconies, terraces or gardens. The landscaping proposals have been developed to create a sense of privacy and buffer between the public realm and the private amenity spaces and roof terraces. The townhouses in the south of the site are proposed to have gardens and roof terraces which provide useable and flexible spaces to suit family-sized housing. Further details on the landscaping strategy are provided in Section 5.0 of the Design and Access Statement and summarised at Paragraphs 7.114-117 of this Statement.

Health and Wellbeing

7.65 A Health and Wellbeing Statement is submitted in support of the planning application which considers the proposed development in the context of policy objectives of enhancing health and wellbeing. The statement summarises the measures taken to support these objectives and completes the Health Urban Planning Checklist (2015) to conclude that the scheme will support an enhanced level of health and wellbeing for future residents.

7.66 The Statement also assesses the development proposals against the TCPA's Garden City Principles for the 21st Century (2020). Table 3 below is reproduced from the Health and Wellbeing Statement and summarises the scheme's response and high level of adherence to the Garden City principles.

TCPA Garden City Principle	Proposed Development
<p>Strong vision, leadership and community engagement</p>	<p>The vision for the development has been developed with reference to TCPA Garden City principles, as well design principles specific to Welwyn Garden City, including the valued industrial heritage which characterises the site’s immediate context.</p> <p>The proposals have evolved through extensive community involvement with local residents and stakeholders through a robust pre-application public consultation exercise to keep the local community informed about the proposals and offer opportunities to influence the scheme. The feedback from the local community has informed further refinements to the application scheme.</p>
<p>Mixed-tenure homes and housing types that are genuinely affordable.</p>	<p>A variety of housing types and unit sizes are proposed, including apartments and townhouses with a mix of 129 x 1-bed (44%); 126 x 2-bed (44%); 26 x 3-bed (9%); and 8 x 4-bed (3%).</p> <p>10% affordable housing is proposed with a tenure split of 20 (69%) shared ownership and 9 (31%) social rented units.</p> <p>The proposed housing mix is considered by Lambert Smith Hampton (Appendix 6) in terms of affordability with regard to average household incomes. The letter concludes that the purchase of 2-bed properties (and, as follows, 1-bed properties) is attainable for those on the average incomes for the local area.</p>
<p>A wide range of local jobs in the Garden City within easy commuting distance of homes</p>	<p>The Transport Assessment concludes that a high quality network of sustainable transport modes surrounds the site. This network provides easily commutable journeys into the town centre and other nearby employment centres. The site is under a mile from the train station which provides regular services to employment hubs including London. The proximity and connectivity of the site to these transport nodes and employment hubs supports the use of more sustainable modes of travel for daily commutes. The promotion of active modes of travel (walking and cycling) will contribute to the health and wellbeing of residents.</p>
<p>Beautifully and imaginatively designed homes with gardens, combining the best of town and country to create healthy communities, and including opportunities to grow food.</p>	<p>The proposed homes ensure a high standard of residential amenity for future residents. All units meet or exceed internal space standards and the number of dual aspect dwellings has been maximised. The design has evolved with daylight and sunlight input to ensure that good levels of light are provided to the internal spaces to promote a high standard of living accommodation.</p> <p>At least one private amenity space is proposed for each unit in the form of balconies, terraces and gardens. These spaces have been designed into the landscaping scheme to ensure that they maintain a sense of privacy and buffer to the public realm. The spaces are orientated to maximise daylight and sunlight.</p> <p>The private amenity spaces are complemented by 800 sqm of communal roof terrace space which will be accessible by future residents.</p> <p>The extensive public realm proposed provides 3,023 sqm of landscaped public open space and creates multiple opportunities to connect the site to surrounding development and a variety of areas for the local community to mix in.</p>

	<p>Edible planting is integrated into the landscape strategy, which includes an Orchard Hideaway and dining area with edible apple tree and herb planting. This provides opportunities for the local community to grow food.</p>
<p>Development that enhances the natural environment, providing a comprehensive green infrastructure network and net biodiversity gains, and that uses zero-carbon and energy-positive technology to ensure climate resilience.</p>	<p>The development will result in an exceptionally high biodiversity net gain of over 750% compared to the existing situation.</p> <p>The landscaping proposals provide opportunities for roosting bats and nesting birds that are currently lacking, along with other landscape provision such as wildlife-friendly planting to encourage greater biodiversity than is present. Bird and bat boxes and hedgehog tunnels are proposed. The proposals seek to connect in to the Wheat Quarter development and create a landscaped corridor from Bridge Road in the north to the allotments in the south.</p> <p>In terms of energy efficiency, the proposals take a fabric-first approach complemented by renewable energy technologies to achieve savings of 12.86% (residential) and 13.86% (non-residential) against Building Regulation baseline emissions rates. Photovoltaic panels are proposed at roof level to contribute to these savings.</p>
<p>Strong cultural, recreational and shopping facilities in walkable, vibrant, sociable neighbourhoods.</p>	<p>A community hub is proposed as part of the proposals and includes a café or gym use. The hub is sited at the heart of the development and is proposed to act as a focal point for socialising and mixing for the future local residents and those visiting the site from surrounding areas. The extensive public open space creates a variety of social and recreational spaces for use by the community.</p>
<p>Integrated and accessible transport systems, with walking, cycling and public transport designed to be the most attractive forms of local transport.</p>	<p>The landscape and layout of the proposed development will allow for easy pedestrian movement and legible routes through the site. The proposed development proposes to safeguard enhanced pedestrian links northwards towards the Wheat Quarter and surrounding residential development to the west and south.</p> <p>The proposal will see the improvement of BioPark Drive to provide a wider shared footway / cycleway on the northern side of the access road. This footway connects to the existing highway infrastructure on Broadwater Road and will route pedestrians and cyclists directly into the centre of the site.</p> <p>To encourage future residents to cycle, a secure and covered cycle parking space is proposed for each residential unit in accessible locations. Visitor and community hub cycle parking spaces for are also proposed to encourage visitors to the site and future employees of the community hub to opt for cycling.</p> <p>The proposals further seek to encourage sustainable modes of travel through the provision of Electric Vehicle Charging Points and a car club bay. The sustainable travel measures are proposed to be implemented via the Framework Travel Plan.</p>

Table 3: Response of the proposed development to the TCPA Garden City Principles

Daylight and Sunlight: Light Within the Development

- 7.67 Anstey Horne have provided ongoing advice to the project architects to ensure that daylight and sunlight levels in the proposed new residential units are maximised. A 'Light Within' Daylight and Sunlight Report is submitted in support of the planning application, which presents the results of testing within the habitable rooms in the proposed development.
- 7.68 The results indicate that high levels of adherence are achieved for all daylight and sunlight assessments carried out, those include: 93% ADF for the daylight test to dwellings, 85% for annual sunlight to dwellings, and 88% for winter sunlight to dwellings. These are considered to be very good results for units within taller buildings.
- 7.69 In the 'Light Within' Report, Anstey Horne have also modelled the sunlight levels that would be received by the scheme amenity spaces (public open space and communal roof gardens), finding that all amenity spaces adhere to the BRE guidelines and considerably exceed the benchmark for more than 50% of the space to achieve the two-hour guideline at the spring equinox. The results show that excellent levels of sunlight will be achieved in the amenity spaces which would support the useability of the spaces throughout the year.
- 7.70 Overall, the daylight and sunlight modelling for the habitable rooms and amenity spaces in the development demonstrates high adherence rates for a scheme of this nature that will contribute to the high standard of residential amenity provided by the proposals.

Noise and Vibration

- 7.71 A Noise and Vibration Assessment, produced by Noise Solutions Ltd, is submitted in support of the application. The assessment demonstrates that, by incorporating reasonable mitigation measures, adverse effects of noise can be minimised to ensure that internal noise levels in the development meet BRE guidelines. The mitigation measures include the glazing and ventilation specifications defined within Noise Solution Ltd's report.
- 7.72 In terms of external spaces, the units not facing the railway to the west or distribution depot to the north are subject to lower noise levels. An acoustic fence is proposed to the western boundary of ground level gardens on the west elevation to minimise noise levels within these gardens to within BRE guideline levels. The communal roof gardens are at heights that won't be affected by, or will include screening to provide shielding from, noise effects of the aforementioned sources. These areas would be within WHO guideline levels.

- 7.73 The proposed communal areas will provide alternative amenity space that is within the WHO guidelines for those units with balconies affected by the noise sources. The principle of providing alternative amenity space that falls within the WHO guidelines is accepted by BRE guidance.
- 7.74 The assessment adds that vibration levels measured at the surface of the site are low and are not likely to lead to adverse effects on the proposed buildings or their occupants.
- 7.75 Overall, the Noise and Vibration Assessment concludes:

“Through the use of mitigation (including selection of suitable glazing and ventilation) and the provision of shielded external amenity areas, the proposed development complies with accepted acoustic practice and is acceptable in terms of noise. Noise should not be a reason for refusal of planning permission.” (Paragraph 10.8)

Ground Conditions

- 7.76 A Phase I and II Geoenvironmental Assessment, produced by Symbiotic Solutions, is submitted in support of the application. The report identifies no significant risks in contamination terms which require specific remediation or mitigation actions. The report concludes that from a geoenvironmental perspective, the site is suitable for the proposed residential development in its current conditions.

Existing Residential Amenity

Privacy

- 7.77 The amenity of surrounding properties has been considered through the design process. The proposed buildings will have separation distances well in excess of 20 metres to properties on Penn Way. This is considered appropriate for urban locations. It is also worth noting that the proposed buildings are generally set further back from the site boundary compared to the existing BioPark building and, as such, the relationship between the buildings will be an improvement on the existing situation. To further increase privacy, the boundary treatment to Penn Way is a proposed 1.8 metre high fence. The proposed balconies for the apartment blocks have metal railings which will provide some degree of obscuring views downwards from the balconies towards Penn Way.

Daylight and Sunlight

- 7.78 In the second Daylight and Sunlight Report, Anstey Horne have assessed the daylight and sunlight availability to neighbouring properties to the north-east, east and south-east of the site (including those on Penn Way and Broadwater Crescent). In terms of daylight, the assessment demonstrates adherence rates of 97% for VSC and 98% for daylight distribution. The remaining properties will not be significantly impacted and will continue to experience levels of daylight and sunlight close to existing levels. In terms of sunlight, all of the rooms within the neighbouring properties exceed guideline values. meaning that they will either not be impacted at all or not be notably affected by the proposals. Overall, the results show an excellent level of adherence to the BRE guidelines, particularly considering the site's urban location.
- 7.79 For the very small number of windows and rooms that do not meet the daylight guideline values, there will be no material impact on daylight availability. Furthermore, a number of windows and rooms in neighbouring properties show substantial increases in daylight and/or sunlight availability due to the increased permeability of the proposed development compared to the existing massing.

Air Quality

- 7.80 The Air Quality Assessment within the Environmental Statement demonstrates that the proposed development will not cause any exceedances of the Air Quality Objectives or limit values in the local area, neither at construction nor operation stage. Furthermore, the future occupants of the proposed development will not be exposed to unacceptable air quality.

Conclusion

To conclude on residential amenity, the proposals will provide a high standard of amenity for future occupants and safeguard existing amenity in neighbouring developments. Daylight, sunlight, overshadowing, overlooking, privacy, noise, vibration, contamination and air quality considerations have been fully assessed and found to be in accordance with NPPF guidance and local policies.

Housing Tenure and Mix

Policy Context

- 7.81 The adopted Local Plan requires that, in the towns, all proposed development providing 25 units or more should include the provision of affordable housing at 30% (**Policy H7** Affordable Housing). The Plan expects a range of dwelling types, tenures and sizes (**Policy H8** Dwelling Type and Tenure). **Policy H10** (Accessible Housing) requires at least 20% of all new dwellings on sites involving 5 or more new dwellings to meet Building Regulations Part M4(2) standards for 'accessible and adaptable dwellings' the delivery of which should be distributed across market and affordable tenures. It is considered that this proportion may vary where a proportion of dwellings are proposed to meet Part M4(3) standards for 'wheelchair user dwellings'. In addition, a proportion of dwellings should be built to lifetime homes standard.
- 7.82 **Policy SP17** (Mixed Use Development Site at Broadwater Road West) of the submitted draft Local Plan seeks a wide mix of housing types, sizes and tenures, including a minimum of 30% of units as affordable housing within the Opportunity Area. **Policy SP7** (Type and Mix of Housing) of the submitted draft Local Plan requires a range of housing to be delivered in line with WHBC's latest evidence of need, including accessible housing, and affordable housing provision that is in line with the target in Policy SP17.

Scheme Assessment

- 7.83 A variety of unit sizes are proposed, including 129 x 1-bed (44%); 126 x 2-bed (44%); 26 x 3-bed (9%); and 8 x 4-bed (3%). An Accommodation Schedule is provided at Appendix 5.
- 7.84 The proposals seek to maximise the number of 2+ bed units proposed, including almost 10% 3-bed units and the proposed 4-bed family townhouses which will provide high-quality family-sized housing. Notwithstanding, it is recognised that the proposed housing mix incorporates a greater proportion of 1- and 2-bed units compared to WHBC's identified district-wide housing need. The letter from Lambert Smith Hampton at Appendix 6 considers the proposed unit mix in the context of the housing market and demographics of the local area.
- 7.85 In recognising the accessible urban location of the site, the letter finds the demographic profile of the area is younger workers with an average household size of 2.4 people. An overview of average household income in the area indicates that a new home purchase at around £300k is achievable. Furthermore, the letter identifies a current under-supply of 2-bedroom stock when compared to demand. The letter concludes that 1 and 2-bedroom apartments are the most suitable housing stock to be delivered in this location.

- 7.86 29 units (10%) are proposed as M4(3) wheelchair user dwellings and the remainder to meet M4(2) standards for accessible and adaptable dwellings, exceeding the requirements of **Policy H10** (Accessible Housing) and emerging **Policy SP7** (Type and Mix of Housing). Three of the M4(3) dwellings are proposed as affordable housing, including two shared ownership units and one social rented unit.
- 7.87 Affordable housing provision has been incorporated in accordance with the above policies and viability testing of the scheme, as presented in the submitted Financial Viability Assessment. Affordable housing is addressed in full in the Affordable Housing Statement at Section 8.0 of this Statement. The proposal is for 10% (29 units) affordable housing with a tenure split of 20 (69%) shared ownership and 9 (31%) social rented units.
- 7.88 An appropriate housing mix is proposed to provide a range of housing types, including family housing and accessible dwellings, to help meet the needs and requirements of different households. The proposed mix is fully justified with reference to the site's sustainable location and local demographics and market demand. The proposals comply with the adopted and emerging Local Plan policies and will encourage the creation of a mixed community.

Highways, Access and Parking

Policy Context

- 7.89 Section 9 of the NPPF sets out transport guidance, including a fundamental objective for the planning system to actively manage patterns of growth to focus development in sustainable locations, and in turn reducing the need to travel, and offering a genuine choice of sustainable transport modes (**Paragraph 103**).
- 7.90 The NPPF requires all developments that generate significant amounts of movement provide a travel plan and be supported by either a Transport Statement or Transport Assessment (**Paragraph 111**).
- 7.91 The three key transport tests are set out in **Paragraph 108**:

"In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

- a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;*
- b) safe and suitable access to the site can be achieved for all users; and*

c) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.”

- 7.92 When it comes to highways matters, development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe (**Paragraph 109**).
- 7.93 Key adopted Local Plan objectives are to reduce the overall need to travel by integrating land uses with transport, to reduce dependency on the car and to encourage more sustainable modes of travel (**Paragraph 6.8**, District Plan District-wide Policies). **Policy M5** (Pedestrian Facilities) says that WHBC will seek improvements in facilities for the safe and convenient movement of pedestrians and encourage the provision of safe and direct routes that link to existing footpath networks.
- 7.94 The Parking SPG (2004) requirements in Zone 2 (which covers the northern part of the site) are 0.75 per 1-bed dwelling, 1 space per 2-bed dwelling, 1.5 space per 3-bed dwelling, 2 spaces per 4-bed dwelling, and 1 long term cycle space per unit (if no storage is provided). Block F and the townhouses are within Zone 3, where the SPG requirements are 1.25 for a 1-bed dwelling, 1.5 for a 2-bed dwelling, 2.25 for a 3-bed dwelling and 3 spaces for a 4-bed dwelling. WHBC have produced an interim Policy for Car Parking Standards that states that parking provision will be assessed on a case by case basis and the existing maximum parking standards within the SPG should be taken as guidance only.
- 7.95 In addition to car parking, one long term cycle parking space is required for each flat. For a proposed gym use, 1 short term space is required per 25sqm plus 1 long term space per 10 full time staff.
- 7.96 Draft **Policy SADM12** (Parking, Servicing and Refuse) of the submitted Draft Local Plan says that vehicle parking will be informed by the Council’s parking standards and take account of the site’s accessibility to public transport, services and facilities and the need to promote more sustainable forms of travel within the borough. Draft **Policy SP9** (Place-making and High Quality Design) of the asks that development is designed to be legible, permeable and well connected with pedestrian travel prioritised.

Scheme Assessment

- 7.97 A Transport Assessment, produced by i-Transport, is submitted in support of the application. The Transport Assessment has been developed in accordance with pre-application feedback from HCC (as Highways Authority) and WHBC.

7.98 In Section 3, the Transport Assessment identifies the range of walking and cycling opportunities and public transport options to conclude that a high quality network of sustainable transport modes surrounds the site. These baseline conditions are reflected in the low car ownership levels of existing residents in the area (sourced from the 2011 Census), with an average of 0.62 cars per flat/maisonette.

Access

7.99 In terms of the proposed access arrangements, BioPark Drive will provide the primary access to the site. The proposed access arrangements include modifications to the existing access to accommodate a residential development whilst enhancing the streetscene. The proposed access arrangements are shown in drawing ITL16195-GA-005 ('Drawings' Appendix, Transport Statement).

7.100 The proposed access arrangement has been designed with the following:

- 4.8m carriageway with localised widening to 5.5m;
- 3.1m shared footway/cycleway on the northern side of the access road;
- Landscaped verge between the foot/cycleway and the carriageway with "breaks" in the landscape to enable wider vehicles to pass, and for emergency vehicles to utilise the shared foot/cycleway to bypass any obstructions that may occur in the main carriageway; and
- 2.4m x 43m visibility splays at the access to Broadwater Road in accordance with the posted speed limit.

7.101 To enhance permeability through the site, potential secondary access options have been explored including access via Penn Way, the Wheat Quarter and from Broadwater Crescent. Opportunities to create links to these existing developments are safeguarded by the proposals. The applicant team are in discussion with both WHBC and HCC Officers regarding the potential link to the north via the Wheat Quarter and both Councils have provided in-principle support for a proposal to relocate the substation that blocks this access in the approved Wheat Quarter scheme (ref. 6/2018/0171/MAJ), noting that a new planning application for the South Side of the site is being prepared by the site promoters.

Trip Assessment

7.102 Vehicle trip assessment of the proposals is contained in Section 6 of the Transport Assessment. Adopting a ‘worst-case’ scenario, the net impact of the development proposal shows a reduction in overall vehicle trips compared to that associated with the existing B1b use of the site, should it be reoccupied. The assessment finds:

- A significant reduction in inbound trips at the site in the morning peak as a result of the proposal changing the site from the being a net “attractor” as an employment use, and a net “generator” as a residential use. The opposite patterns also occur, as to be expected, in the evening peak hour.
- There is an overall reduction in the total two-way person trips across the day, including a reduction of up to 60 two-way total person trips during the network peak hours;
- An overall reduction in two-way vehicle trips across the day and during the network peak hours, including:
 - A reduction of over 30 vehicles during the morning peak hour;
 - Circa 10 fewer vehicles during the evening peak hour; and
 - No significant change in overall vehicle trips across a 12 hour day.

Parking

7.103 Under the Parking SPG (2004), the maximum car parking allowance for the residential uses would be 299 spaces. While the zoning approach in the SPG does not strictly apply to residential uses, as an indication, applying the relevant Zone 2 and 3 discount to this figure would result in a potential discount of up to 153 spaces, resulting in a maximum parking allowance of 146 spaces.

7.104 It had been agreed through pre-application consultation with WHBC that a parking ratio of 0.63 spaces per residential unit (reflecting the ratio approved at the Wheat Quarter) could be appropriate subject to robust justification. Since the third pre-application meeting, and as a direct response to feedback from the public consultation, the amount of car parking on site has been increased to provide a residential parking ratio of 0.76 (from 0.63). The proposed level of car parking provision is fully justified with reference to the site’s highly accessible location, car ownership levels in the local area, and the proposed measures to increase modal shift towards more sustainable modes (including cycle parking and the Framework Travel Plan).

7.105 To protect against any overdominance of car parking within the public realm, the majority of parking is proposed at basement level. The parking and cycle parking numbers are summarised in Table 4 and shown on the submitted Parking Plans (Transport Assessment, Appendix G). The parking provision includes a 10% visitor parking allocation in the basement, a car club space at surface level near to the community hub, and over 20% of spaces are equipped with Electric Vehicle Charging Points. Residential blue badge parking provision is allocated in the basement close to the respective building core for each of the M4(3) dwellings. A visitor blue badge space is provided at surface level.

Parking		
Residential	Basement standard	148
	Basement blue badge	29
	Basement visitor	22
	Surface	20 (4 undercroft parking spaces on Block F, 16 spaces for the townhouses)
	Electric vehicle charging points	22 active spaces in the basement (inc. 2 blue badge bays) and 1 active in Block F undercroft. 22 passive spaces in the basement (inc. 2 blue badge bays)
	Total residential car parking	219
	Basement motorcycle parking	12
	Long term cycle spaces	289
	Total residential cycle parking	289
	Community hub	Surface standard
	Surface blue badge	1
	Car club	1 (with active EVCP)
	Total community hub car parking	7 (inc. 1 car club)
Visitor cycle parking (surface)		10 long term and 8 short term
Community hub long stay cycle parking (in unit)		1
Residential car parking ratio		0.76

Table 4: Car, cycle and motorcycle parking summary table

- 7.106 A Parking Management Strategy and accompanying Parking Plan (see Transport Assessment Appendix G) is set out at Section 7 of the Transport Assessment.
- 7.107 The proposals ensure that car parking is not prominent within the streetscene. Facilitated by the site's accessible location close to the train station and town centre, the proposed provision of cycle parking would ensure that sustainable modes of travel would be encouraged.

Framework Travel Plan

- 7.108 A Framework Travel Plan is submitted in support of the application which sets out a range of measures that will be implemented to encourage and support future residents and visitors to travel to and from the site by sustainable modes as well as mode shift targets. This tool will underpin the sustainable travel options available to future residents.
- 7.109 The site is located in a highly sustainable location in transport terms. The development provides safe and appropriate access to the site for all and would have a negligible transport impact in terms of capacity and congestion. Accordingly, the proposed development is acceptable when assessed against national and local highways policies.

Landscaping and Biodiversity

Policy Context

- 7.110 **Paragraph 127** of the NPPF sets out that developments should be visually attractive as a result of effective landscaping, and should be sympathetic to the surrounding landscape setting. **Paragraph 170** says that planning decisions should enhance the natural environment by minimising impacts on and providing net gains for biodiversity.
- 7.111 **Policy D8** (Landscaping) of the District Plan says that all development should reflect the strong tradition of urban landscape design to include landscaping as an integral of the overall design. Landscaping schemes should respect the character of the area. The retention of trees will be expected wherever feasible, and where this is not possible, replacement planting should be carried out. **Policy R11** (Biodiversity and Development) notes that all development should contribute positively to biodiversity by the promotion of natural areas and wildlife corridors and the use of locally native species in planting.

7.112 **Policy SADM11** (Amenity and Layout) of the draft Local Plan advises that external private and communal garden space should meet the reasonable needs of its users. The design of new communal garden areas should seek to create spaces that provide opportunities for privacy or seclusion for residents. **Policy SADM16** (Ecology and Landscape) says that proposals will be expected to maintain, protect and wherever possible enhance biodiversity and the structure and function of ecological networks.

Scheme Assessment

Landscape Proposals

7.113 In a reflection of the strong tradition of urban landscape design in Welwyn Garden City, the landscaping forms an integral part of the overall design proposals. The submitted Landscape Strategy (Section 5 of the Design and Access Statement) and Landscaping Plans establish the landscaping principles, which draw upon the following Garden City principles in particular (paraphrased from the TCPA Principles for 21st Century Garden Cities, 2020):

- Beautifully and imaginatively designed homes with gardens in healthy communities;
- Opportunities for residents to grow their own food, including allotments;
- Strong cultural, recreational and shopping facilities in walkable neighbourhoods;
- Well-connected and biodiversity rich public parks; high quality gardens; tree-lined streets; and open space; and
- Integrated and accessible transport systems.

7.114 The landscape scheme is centred around a series of public courtyards between the apartment blocks. These public open spaces are designed to integrate with the built form to create a unified, legible public realm.

7.115 Key features of the landscape proposals are:

- Large community lawn area at the heart of the development which provides opportunities for informal play and seating;
- Orchard Hideaway and native hedgerow along the western boundary, as well as outdoor dining area amongst edible planting, in a reflection of the Garden City principle of integrating food growing opportunities for the local community;
- Hedgerows and climbers to soften the main vehicle entrance (BioPark Drive);

- Ornamental and hedge planting buffer between townhouses and adjacent existing residential development;
- Three doorstep play spaces incorporating sensory play equipment for use by residents and the wider community;
- Roof terraces with a variety of spaces created including Garden Rooms, formal and informal seating and sun beds;
- Grass amphitheatre with dual purpose as SuDS attenuation basin;
- Use of climbing plants on the proposed buildings to visually soften the development into its setting;
- Private amenity space for every unit, including gardens, terraces and balconies;
- Climbers on the fencing between the surface car parking area and existing dwellings on Penn Way;
- Timber fence at the rear of the townhouses to provide security and privacy; and
- Extensive biodiverse green and brown roofs.

7.116 As sought by the TCPA Garden City principles, the landscaping proposals will enhance biodiversity and create pleasant open spaces for the enjoyment of the community. The proposed planting will use native species wherever possible.

7.117 In a reflection of the Garden City principle of well-connected public parks, the landscaping scheme has been designed to complement the landscaping approved in the Wheat Quarter scheme, to contribute to the creation of a landscaped corridor from Bridge Road in the north and connect in to the allotments to the south. Enhancements to the connectivity of the site will encourage the use of the proposed amenity spaces by the wider community.

Ecology

7.118 An Ecological Impact Assessment (including biodiversity net gain calculation), produced by Green Environmental Consultants reports upon a Phase 1 habitat survey of the site. It confirms that the existing site has low ecological value, there are no significant constraints to the redevelopment of the site in terms of biodiversity, and no further ecological surveys are required. Notwithstanding, ecological mitigation measures are proposed including bird and bat boxes and hedgehog tunnels.

7.119 In terms of biodiversity net gain, the proposed new green infrastructure will significantly enhance ecological opportunities throughout the site. Open spaces will include enhancements for wildlife, including new native and insect-friendly planting, green roofs, and new nesting and roosting opportunities. As a result, the biodiversity net gain calculation shows a significant uplift resulting from the proposed development equating to a habitat unit gain of over 750% compared to the existing situation. This considerably exceeds the 10% biodiversity net gain sought by national government in the forthcoming Environment Bill, signifying the extent and quality of the proposed landscaping scheme.

Trees

7.120 The scheme's arboricultural consultant David Clarke has surveyed the trees at the site and prepared a full suite of arboricultural reports in support of the application.

7.121 The Arboricultural Report notes that 8 dead or predominantly dead trees and those of low amenity value are recommended to be removed for arboricultural reasons irrespective of this planning application.

7.122 To implement the proposed development 3 individual trees will need to be removed. Two of these are all low quality or unremarkable 'C' category trees (as set out in BS 5837:2012) with limited amenity value. The remaining tree is a moderate quality 'B' category tree. The visibility of this tree is restricted to the general public and it provides low amenity value. The report notes that the significant tree planting in the landscaping proposals will improve upon the quality and quantity of trees within the site and mitigate against the removal of the aforementioned trees.

7.123 Retained trees will be protected during the site construction by means of the mitigation measures set out in the Arboricultural Method Statement. Overall, there will be a minimal effect on existing trees and the Arboricultural Report concludes that the proposed development is acceptable in arboricultural terms.

Conclusion

7.124 The proposed development introduces an extensive soft landscaping scheme which draws upon Garden City principles. The proposed development will result in significant improvements to existing conditions in terms of biodiversity and ecological opportunities to contribute to a biodiversity net gain of over 750%. Overall, the proposals will support enhanced biodiversity and provide a high-quality environment for future and existing residents in accordance with the NPPF and local adopted and emerging policies on landscaping and biodiversity.

Flood Risk and Drainage

Policy Context

- 7.125 **Paragraph 163** of the NPPF seeks to ensure that development proposals do not increase flood risk elsewhere. **Paragraph 165** states:

“Major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate. The systems used should:

- (a) take account of advice from the lead local flood authority;*
- (b) have appropriate proposed minimum operational standards;*
- (c) have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development; and*
- (d) where possible, provide multifunctional benefits.”*

- 7.126 Draft Policy **SADM14** (Flood Risk and Surface Water Management) refers to national policy in terms of flood guidance, adding that proposals that require a Flood Risk Assessment should:

“Protect and enhance the flood risk management function of existing overland flow routes, watercourses and flood plains/storage areas to ensure there is no net loss of flood storage, flows are not impeded, and opportunities to make space for water are taken.”

- 7.127 With respect to surface water drainage, the draft policy adds that all major development proposals, and all proposals in areas identified as being at risk of surface water flooding, will be required to manage surface water runoff and surface water flood risk via the use of Sustainable Drainage Systems.

Scheme Assessment

- 7.128 While the site is within Flood Zone 1, the site area is over 1ha, and a Flood Risk Assessment of the proposals produced by Curtins is submitted in support of the application. The flood risk to the site from all sources is assessed and found to be ‘very low’.
- 7.129 As shown in Appendix E of the Flood Risk Assessment and Drainage Strategy, a sustainable urban drainage system (“SuDS”) is proposed which will mitigate any flood risk to the proposed development. The SuDS system has been developed in consultation with HCC as the Lead Local Flood Authority and has evolved to integrate with the design and landscaping proposals.
- 7.130 The SuDS system will represent a betterment on the existing system due to its ability to manage high intensity rainfall events. It has been designed to accommodate a 1 in 100 year storm event plus a 40% allowance for the increase in rainfall due to climate change.

- 7.131 The drainage strategy includes a range of SuDS measures to manage and treat rainfall close to the source. majority of the surface water attenuation is provided in a permeable sub-base both above the basement slab and beneath the surrounding access road. Further to this, blue and green roofs have been provided in locations across the site, as well as an attenuation basin. These features have dual biodiversity and SuDS benefits.
- 7.132 The site will discharge to the existing Thames Water surface water sewer beneath Broadwater Road at a rate that is limited to greenfield run off rates (1.6l/s).
- 7.133 Appendix E of the Flood Risk Assessment and Drainage Strategy shows the indicative foul water strategy. The proposed strategy is to collect soil vent pipes and stub stacks from the building in a below ground system and discharge to the existing Thames Water foul sewer. Any run-off from the basement will be collected via gullies and pumped to the below ground foul water system.
- 7.134 The proposed development will not increase the risk of flooding at the site or elsewhere and appropriate provision has been made to manage surface and foul water in accordance with the NPPF and draft local policies.

Energy and Sustainability

Policy Context

- 7.135 **Paragraph 148** of the NPPF says that the planning system should aim to contribute to reducing greenhouse gas emissions and support renewable and low carbon energy generation.
- 7.136 **Policy SADM13** of the emerging Local Plan states that all major development proposals must demonstrate that they have sought to maximise opportunities for renewable and low carbon sources of energy supply where consistent with other Local Plan policies. Furthermore, all newly constructed dwellings will be required to achieve an estimated water consumption of no more than 110 litres per person per day, with water reuse and recycling and rainwater harvesting incorporated wherever feasible to reduce demand on mains water supply.

Scheme Assessment

Energy

- 7.137 The application is supported by an Energy Statement which outlines the scheme's approach to energy savings in line with Policies SP1, SP10 and SADM13 of WHBC's draft Local Plan. In accordance with the energy hierarchy, the proposals take a fabric-first approach complemented by renewable energy technologies to achieve savings of 12.86% (residential) and 13.86% (non-residential) against Building Regulation baseline emissions rates.

7.138 The energy strategy involves the provision of an internal heat network for the apartment blocks which is to be fed by an energy centre in the basement. The energy Centre will feed all flats for heating and hot water via gas boilers. It is not feasible to connect the townhouses to the heat network, therefore each will be provided with their own heating and hot water from independent boilers in each dwellings. Photovoltaic panels are provided at roof level on the apartment blocks and an air source heat pump is proposed to serve the community hub.

7.139 Water consumption within the new dwellings will be restricted to no more than 110 litres per person per day.

Sustainability

7.140 A Sustainability Statement is submitted in support of the application which considers the proposed development against the Welwyn Hatfield Sustainability Checklist (Appendix B, Sustainability Statement). The report summarises the sustainable design, construction and management measures that are proposed in consistency with the checklist, including the following parts of the proposals:

- Energy strategy;
- Sustainable transport strategy;
- Water saving design features;
- Drainage strategy;
- Landscaping strategy;
- Ecological enhancements;
- Building materials;
- Waste management; and
- Pollution prevention.

7.141 The Sustainability Statement concludes that the proposed development adopts opportunities within its design and construction to minimise the environmental impact of the scheme and, in turn, meets national and local planning policy targets for sustainability measures.

8.0 Affordable Housing Statement

Introduction

- 8.1 This Affordable Housing Statement addresses the level of Affordable Housing provision, which is proposed as part of the 289 residential units. It identifies the relevant planning policies, the affordable housing need of the borough and sets out the response to policy requirements.

Planning Policy

Welwyn Hatfield District Plan (2005) – Saved Policies (2008)

- 8.2 **Policy H7** (Affordable Housing) is the adopted policy. The policy threshold for affordable housing is residential development on sites of 1ha or more, or with 25 units or more. The Council will therefore seek through negotiation a proportion of affordable housing, which as a minimum should comprise 30% subsidised housing, on each suitable site. The proportion, type and mix of affordable housing will be based on information in the latest housing needs survey.

Welwyn Hatfield Draft Local Plan

- 8.3 **Policy SP7** (Type and Mix of Housing) includes affordable housing requirements. Subject to viability, for sites in Welwyn Garden City, it seeks 30% of total residential units to be affordable housing on sites of 11 new dwellings or more, or 0.5ha in size. It goes on to state that on-site provision will be prioritised over off-site or a commuted payment.
- 8.4 **Policy SP17** (Mixed Use Development Site at Broadwater West) in addressing housing mix refers to the inclusion of 30% of all units to be affordable housing unless it can be robustly demonstrated that such a proportion would not be viable.

National Planning Policy Framework 2019

- 8.5 **Paragraph 64** states that where major development involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of the homes to be available for affordable home ownership, as part of the overall affordable housing contribution from the site, unless this would exceed the level of affordable housing required in the area.

Local Housing Need

- 8.6 It is documented in Section 6.0 that the Draft Local Plan is currently at the Examination-in-Public stage of the plan-making process. A principal matter raised by the Inspector is that of the Objectively Assessed Need (OAN). The Draft Local Plan currently identifies a need for 12,000 new homes for the period between 2012 and 2032. However, based on the standard methodology, the Inspector has noted OAN to be 16,000 new homes over the period 2016-2036. The Council undertook an independent study earlier in 2020 and has recently resolved, in November, to submit a new OAN figure of 13,800 new homes for the period 2016-2036 or 690 units per annum. This is currently being considered by the Inspector before a decision is made to recommence hearing sessions in early 2021.
- 8.7 The Draft Local Plan is informed by the Welwyn Hatfield Strategic Housing Market Assessment (SHMA) Update 2017. The update does not include a full review of affordable housing need, carried out in the 2015 version. However, it does apply a discrete update and concludes that 818 affordable homes are needed per annum to 2022 to clear the backlog of unmet need as identified in 2017 and 602 per annum thereafter (calculated to 2032). Despite the misalignment in delivery periods (2015-2032 vs 2016-2036), these annual delivery requirements to meet affordable housing need outstrip the Council's proposed OAN per annum by some 130 units until 2022 and then fall slightly below by some 90 units thereafter. The need for affordable housing is at an amount that realistically is unachievable under the current housing strategy.
- 8.8 Notwithstanding the affordable housing need calculated in the SHMA, the Draft Local Plan at Paragraph 9.19 records that the Council estimates that affordable homes will account for around 20% of all new homes in Welwyn Hatfield over the plan period, noting that the precise level may be subject to external influences and viability.
- 8.9 It is clear that the borough has a chronic issue surrounding the lack of affordable homes, which has driven such a high level of affordable housing need. The Council notes that a realistic level of affordable housing delivery is likely to be around 20%, which is a reasonable reflection of delivery in practice when other factors, pertaining, mainly, to viability are taken into account.

Proposed Level of Affordable Housing

- 8.10 Viability testing of the proposed development has shown that the scheme cannot viably support affordable housing. The full appraisal can be found in the Financial Viability Appraisal prepared by Kempton Carr Croft.

- 8.11 The 30% requirement for affordable housing, which runs through adopted Policy H7 and draft Policies SP7 and SP17, cannot be met. The FVA robustly demonstrates that this is the position of the proposed development.
- 8.12 Notwithstanding the viability position, in recognising the Council’s affordable housing shortfall, which was made even more apparent during the public consultation where affordable housing was raised as one of the foremost issues, the Applicant proposes 10% of the total units proposed to be affordable housing. This equates to 29 units out of the total 289 units. The total number is proposed to be tenure split at 69% (20 units) Shared Ownership and 31% (9 units) Social Rented.
- 8.13 The housing mix split is shown in Table 5.

Size	Social Rent	Shared Ownership	Private Market	Total
1-Bed	2	8	119	129
2-Bed	5	8	113	126
3-Bed	2	4	20	26
4-Bed	0	0	8	8
Total	9	20	260	289

Table 5: Housing Mix

- 8.14 The Applicant has yet to engage with a Registered Provider. The affordable housing mix could therefore change.

9.0 Conclusion

9.1 This PS is submitted on behalf of HG Group in relation to the proposed redevelopment of BioPark, Broadwater Road, Welwyn Garden City, AL7 3AX for:

“Demolition of existing buildings and construction of 289 residential units (Use Class C3) and community hub (Use Class E/F.2), with public realm and open space, landscaping, access, associated car and cycle parking, refuse and recycling storage and supporting infrastructure.”

9.2 Following extensive pre-application discussions with Welwyn Hatfield Borough Council Planning Officers, Place Services, Historic England and Hertfordshire County Council (Lead Local Flood Authority and Highways Authority), the proposed scheme has been evolved, refined and improved.

9.3 In preparing this planning application, the project team have engaged with the local community and stakeholders through a robust public consultation exercise to further refine the proposals. From an early stage, the Broadwater Gardens scheme has been advanced with the Garden City Principles at its core to propose an appropriate and high quality 21st Century addition to the Garden City ethos.

9.4 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that determination of planning applications must be made in accordance with the Development Plan unless material considerations indicate otherwise.

9.5 The presumption in favour of sustainable development at Paragraph 11d of the NPPF states:

*“Plans and decisions should apply a presumption in favour of sustainable development ...
For decision-taking this means:*

- *approving development proposals that accord with an up-to-date development plan without delay; or*
- *where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:*
 - *the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
 - *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”*

- 9.6 Footnote 7 to Paragraph 11 says that, for applications involving the provision of housing, policies will be considered out-of-date where the local planning authority cannot demonstrate a five year supply of deliverable housing sites or where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous three years.
- 9.7 WHBC holds an out of date local plan by reason of its out of date policies and because it cannot demonstrate a 5 year land supply. Therefore, Paragraph 11d is engaged.
- 9.8 The proposal would deliver the following key benefits:
- Development of a previously developed brownfield site which is vacant, underutilised and available for development;
 - Provision of 289 residential units including a high proportion of family-sized units, wheelchair adapted dwellings and 10% affordable housing provision to boost housing supply in the district;
 - Use of an accessibly and sustainably located site to deliver, within a short timeframe, approximately 2% of WHBC's OAN for the emerging Local Plan period;
 - Regeneration of the site and contribution to the emerging mixed-use community in the Broadwater Road West Opportunity Area;
 - Improvements to the quality of the townscape in the site's surroundings, creating a strong sense and identity in keeping with the Garden City Principles;
 - New jobs at both construction and operations stages leading to beneficial effects on the local economy;
 - Increased activity and spending which would encourage economic growth and enhance the vitality and viability of the town centre and Wheat Quarter commercial uses;
 - Provision of new publicly accessible open spaces and community hub gym or café bringing associated employment provision;
 - Enhancements to the permeability of the area and providing a pedestrian link from the town centre and train station outwards towards the southwest;
 - A high standard of accommodation including ample communal and private amenity spaces for future occupants;

- Breaking up of the existing monolithic massing to improve light penetration through the site to residential development in the east;
- Enhancement of the, currently private, access road (BioPark Drive) by landscaping to create a welcoming approach to the development;
- Extensive soft landscaping and green roofs resulting in a significant biodiversity net gain of over 750%;
- Integration of renewable energy technologies and fabric-first approach to achieve emissions savings of 12.86% (residential) and 13.86% (non-residential);
- Management of surface water via the SuDS systems, which brings additional benefits in terms of reducing pollution and enhancing biodiversity;
- Encouragement of sustainable modes of travel through the provision of Electric Vehicle Charging Points, car club bay, cycle parking and Framework Travel Plan; and
- Financial contributions to community infrastructure.

9.9 In addition to the abundant number of benefits, it has been demonstrated that the proposed development has created a spatial capacity within which the scale of the buildings can sit comfortably. This is robustly supported by the findings of the HTVIA, which finds that the proposals will have a beneficial impact on the townscape and nearby heritage assets. The scale of the proposals, whether by height, mass or density is further underpinned by the following considerations:

- The proposed development is located in one of the most highly sustainable and accessible locations in Welwyn Hatfield, with the train station, town centre and a variety of other public transport options in easy walking and cycling distance. The redevelopment of sites such as these is wholly supported by the latest Government guidance on intensifying the use of urban land for housing delivery around public transport hubs;
- The evolving context of the former industrial area of the Broadwater Road West Opportunity Area towards an increasing proportion of residential uses at densities reflecting the area's sustainable location, including the forthcoming planning application seeking to increase the "South Side" of the Wheat Quarter site to the north to 11 storeys in height;
- The proposed redevelopment of the site is in keeping with core NPPF principles of reusing previously developed land to deliver housing in areas of high housing demand whilst relieving pressure on Green Belt land elsewhere in the district;

- In a reflection of WHBC's support for the principle of development, and recognition of the opportunity to deliver residential development of a scale commensurate with the site's sustainable location, the site has been progressed by the Council as a recommended housing allocation in the draft Local Plan;
- The site would make a significant contribution towards meeting the minimum 4,000 dwelling shortfall of housing land to meet the current OAN figure for the draft Local Plan. The contribution is equivalent to over 2% of the lower 13,800 dwelling OAN figure put forward to the Examining Inspector in late 2020; and
- The proposals have been fully assessed and found to result in no material impact to neighbouring amenity, indicating that the site has the capacity for the scale of development proposed.

9.10 Therefore, in accordance with Paragraph 11d of the NPPF, a compelling case is put forward. This Planning Statement establishes that there are no adverse impacts that significantly or demonstrably outweigh the vast benefits of the proposal nor are there any areas or assets of particular importance that are protected by the NPPF that provides a clear reason for refusing the development proposed.

9.11 The proposed development is evidently sustainable development and should be supported by the Council through the grant of planning permission.

**Appendix 1 - Schedule of Application Plans
and Drawings**

**Appendix 2 - First WHBC Pre-Application
Response**

**Colin Haigh
Head of Planning**

Mr M Westcott
hgh Consulting
45 Welbeck Street
London
W1G 8DZ

Reply To: address as below
Direct Tel: 01707357000
Email: planning@welhat.gov.uk

1 July 2020

Dear Mr Westcott,

Application Reference: 6/2020/0804/PA

Proposal: Erection of 340 residential units with associated private and communal amenity space, public open space, car and cycle parking and landscaping

Location: Biopark Broadwater Road Welwyn Garden City AL7 3AX

Thank you for your pre-application enquiry which was received on 31st March 2020. Following our meeting on the 4th June please see below my comments relating to your proposal.

The following response is based on the emerging Welwyn Hatfield Borough Council Draft Local Plan Proposed Submission August 2016 not being formally adopted when the application is presented to Development Management Committee.

Please find my response to your proposal below, which will cover the following areas where further work is required ahead of any future submission:

1. Principle of Development
2. Heritage Assets
3. Urban Design and Landscaping
4. Amenity
5. Housing Mix and Tenure
6. Highways, Access and Parking provisions
7. Other matters

I have also included relevant comments and requirements from the consultee responses received so far. This includes comments from our Historic Building advisor and Urban Design advisor. Any further consultee comments will be forwarded to you on receipt.

The proposed development comprises 340 units with associated private and communal amenity space, public open space, car and cycle parking and landscaping. The development includes the indicative housing mix comprising of 66 x 1-bed (19%); 198 x 2-bed (58%); and 76 x 3-bed (22%). The residential units would be provided across five blocks ranging from 3 to 15 storeys in height.

As you are aware the relevant planning documents include the National Planning Policy Framework 2019 (Framework), Welwyn Hatfield District Plan 2005 (District Plan), emerging Welwyn Hatfield Borough Council Draft Local Plan Proposed Submission August 2016 (eLP), and supplementary planning documents including Broadwater Road West SPD, Supplementary Design

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Guidance 2005 (SDG) and the Supplementary Planning Guidance – Parking Standards 2004 and Interim Policy for Car Parking Standards and Garage Sizes 2014. Additionally national advice such as the National Design Guide is a material consideration.

Principle of Development

The site is designated within a designated Employment Area EA1 under Policy EMP1 of the District Plan. Policy EMP2 of the District Plan outlines acceptable uses in employment areas and states that proposals for any other uses in the designated employment areas are generally resisted and will only be permitted where it can be clearly demonstrated that the existing land or premises are no longer required to meet future employment requirements and business and community needs. The site is also defined under Policy EMP3 of the District Plan to fall within the mixed use development site Broadwater Road West. Development within this site shall be in accordance with criteria EMP2 and the supplementary planning document. This site has been identified to be retained as a research and development site (class B1b).

Policy SP17 of the emerging Local Plan (eLP) is similar, in that, the BioPark is allocated to be retained in Class B1b use unless it can be demonstrated that it is no longer suitable for use as a research facility or it is provided elsewhere in Welwyn Hatfield. Policy SADM10 of the eLP is also relevant and criteria iii of that policy seeks to protect against loss of employment land unless *“it can be demonstrated through active, extensive and realistic marketing over a period of three years that the land or premises are no longer required to meet future employment land needs and that there is a lack of demand for the land or premises in that location”*.

The site has however been put forward within the 2019 Housing Economic Land Availability Assessment (HELAA). The site was considered suitable for potential housing allocation for 179 dwellings, via the site selection process. The Council's Cabinet Planning and Parking Panel (January 2020) agreed the inclusion of a number of new sites, including this one (Pea102). The Council has recently completed the consultation of the eLP proposed changes (2020) and is reviewing the responses. This included the proposal to allocate this site for 179 dwellings.

Notwithstanding this, until the eLP is adopted limited weight can be afforded to the allocation and weight would also be given towards the existing District Plan policies. At this stage, no information has been submitted within this pre-application demonstrating that the research facility is no longer needed, and evidence that the site has been marketed for a continued employment site. As such, the principle of development is considered unacceptable when considered against the District Plan. However, the Local Planning Authority does not have a five year housing land supply and in line with Paragraph 11 of the Framework, the planning balance would be undertaken in presumption in favour of sustainable development.

Any application submitted should therefore provide further marketing evidence to demonstrate; the Biopark premises are no longer suitable for B1b use (or can be re-provided elsewhere) and no longer required to meet future employment land needs or that there is a lack of demand for them. This will then be balanced against the lack of a five year land supply and the presumption in favour of sustainable development as set out in the Framework. For this reason, you will also need to demonstrate that the development could be completed within five years. On submission of an application you should provide a phasing plan, including the housing trajectory and when you anticipate development shall commence. The Framework also encourages the Local Planning Authority to consider imposing a shorter time period, potentially 1-2 years, when development shall commence to ensure that proposals for housing development are implemented in a timely manner and this is something you could propose within the application.

Heritage Assets

It is important to recognise that this is still an emerging scheme and its success is reliant on meeting a wide range of aspirations and interests, fundamentally on designated heritage assets and their setting.

The site is located to the east of the Welwyn Garden City Conservation Area, to the west of the Grade II listed former Roche office building (list entry no: 1348142) and to the south east of the Grade II listed former Shredded Wheat factory (list entry no: 1101084).

Approximately 4km to the south of the site are Hatfield House (Grade I listed) and its associated parkland (Hatfield Park Registered Park and Garden, registered at Grade I) which also includes the Old Palace (Grade I listed) and, immediately to the west of Hatfield Park, St Etheldreda's Church (Grade I listed). Whilst these assets are at a distance from the site, due to the low rise buildings within Welwyn Garden City, tall buildings are likely to impact on views north from these assets.

As required under Section 16(2), 66(1) and 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, special regard shall be had to the desirability of preserving listed buildings or their settings or any features of special architectural or historic interest which they possess, and special attention shall be paid to the desirability of preserving or enhancing the character or appearance of conservation areas.

Paragraph 193 of the Framework also requires that great weight should be given to the conservation of assets, irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance. The more important the asset, the greater the weight should be afforded to the asset's conservation.

It is proposed to demolish the existing building and redevelop the site with residential blocks of 4 storeys in height to the south, stepping up to a 13 storey block in the centre of the site and stepping up again to a 15 storey block at the north western corner of the site.

The demolition of the existing building or redevelopment for residential purposes is not objected to on heritage terms.

Having said that, the heights proposed are considered to result in a detrimental impact upon the surrounding heritage assets, as well as those within Hatfield Park to the south, and are therefore would result in less than substantial harm to the heritage assets.

Firstly, the proposed blocks are substantially higher than the existing building, including the existing flues of which are narrow features and do not span the full length of the building. The proposed development would subsequently introduce blocks of a far greater massing and height across the whole site, and so would appear far more dominant in the locality.

You must ensure the heights proposed respect the Shredded Wheat factory, particularly its silos, as these are a landmark feature within the Garden City and in long distance views towards the Garden City. Within the SPD it states the factory silos are the tallest structures on the strategic site and should remain as a landmark feature with no competing development in the local context. It continues stating that, *'building heights should be reduced towards the southern end of the site to respond to existing surrounding properties.'* On the strategic site the reduction in height towards the south is intentional to ensure development to the south of the strategic site respects the scale of the listed Roche building, the landmark qualities of the silos and the buildings within the surrounding area.

The substantial increase in height would compete with the landmark quality of the silos and their prominence, to the detriment of their significance. The height would also fail to respect the gradual

decline towards the existing residential properties to the south of the strategic site. As such, the proposed height would be contrary to the Broadwater Road West SPD and this is objected to.

The proposed height would also change the setting of the former Roche office building and there are concerns that this could be detrimental. The Roche building is prominent on the corner of Otto Road and Broadwater Road, and the surrounding residential blocks in design and placement preserve its prominence. The substantial increase in building height to the rear of the listed building may appear to loom over the building and crowd its setting, diminishing its prominence. Further assessment of views from Broadwater Road are required to fully assess this.

In terms of the impact upon Hatfield House the silos of the former Shredded Wheat Factory are features in the landscape beyond Hatfield House when looking north from the Southern Approach beyond Hatfield House and looking north from the roof of Hatfield House. As discussed at the meeting, you need to considerably reduce the height to overcome an objection. You should also provide assessments of the views from Hatfield House and Hatfield Park. Prominent modern development to the background of the house or in views from the house and park could negatively impact the experience of these views and could be considered harmful to the significance of these Grade I listed assets.

The Initial Heritage and Townscape Scoping Assessment shows that the existing building can be glimpsed in views from within the Welwyn Garden City Conservation Area from Longcroft Gardens. The increased height will be perceivable in views from Longcroft Lane and potentially from the south eastern edge of the commercial core. The residential areas of the Welwyn Garden City Conservation Area are almost exclusively two storeys in height and benefit from a very distinct insular character with the ridge lines of the buildings themselves forming the skyline. There is little intrusion from larger, modern buildings outside the Welwyn Garden City Conservation Area, resulting in a cohesive character. Views of tall residential blocks to the east of the Welwyn Garden City Conservation Area would appear intrusive and detract from the insular character of the area and distinctive Garden City scale and vernacular.

Whilst further information is required to understand the impact of the proposals on the settings of the identified heritage assets, the proposal in its current form would be harmful to the Grade II listed former Roche office building and the Welwyn Garden City Conservation Area. The proposal is also detrimental to the setting of the Grade II former Shredded Wheat factory in introducing a competing element to the townscape and undermining its landmark status. In addition to this, there are concerns that the significance of the Grade I listed Hatfield House and Hatfield Park will also be harmed by the proposal, although further assessment is required. The harm is 'less than substantial' as per paragraph 196 of the Framework. Regard should also be given to paragraph 193 which affords 'great weight' to the conservation of heritage assets.

As it is considered less than substantial harm, paragraph 196 of the Framework states that '*Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.*' The public benefits of the scheme would therefore need to be weighed up against the disadvantages of the scheme. At this stage you have not demonstrated that the benefits of the scheme would outweigh the harm to the heritage assets. Minded that the increase in height, particularly the 15 storeys, would result in less than substantial harm to several heritage assets (Grade I Listed Building (Hatfield House) and registered parks, Grade II Listed Shredded Wheat Factory, Welwyn Garden City Conservation Area), the greatest weight will be afforded to these with an elevated degree of importance for the assets' conservation. For this reason it is considered that there would be harm to the heritage assets, which would be objected to.

Urban Design

The design assessment at this stage is limited to the details submitted within the Pre-application Covering Report. Notwithstanding this, a well-designed place is unlikely to be achieved by focusing only on the detailing of buildings and materials. It comes about through making the right choices at all levels and there are areas of urban design that can be commented on. These include the relationship between the development and the wider context; the layout; the density; the scale; the amenity and hard and soft landscape. As well as matters relating to technical infrastructure (transport, utilities and services) and social infrastructure (social, commercial, leisure uses and activities), however these will be discussed further on in this response.

The site is located at Broadwater Road and is formed of an irregular shaped parcel of land covering a total area of approximately 1.22 hectares. The site is bounded to the south by allotments and private residential properties, to the east by the Roche factory development, to the north by a distribution depot and to the west by a lorry trailer loading/storage area and the mainline railway slightly beyond. The area has historically been industrial/business in nature, however with the recent development of the Roche factory site and the proposals for the Wheat Quarter (including work started on the southern parcel) it is becoming increasingly residential and therefore from a design perspective residential development in this area is considered acceptable.

In terms of density, Policy H6 of the District Plan states that '*...In central areas and areas with good accessibility by modes of transport other than the car, residential development will be expected to be close to or exceed 50 dwellings per hectare provided that the development will not have an adverse impact on the character of the surrounding area and can satisfy the design policies of the plan.*' Within Broadwater Road West SPD it states density within the area shall be approximately 75 dwellings per hectare.

The development is approximately 261dph and consequently the high density will only be acceptable subject to it not having an adverse impact on the character of the surrounding area and can satisfy design policies of the plan. Whilst the layout of the two blocks is logical, due to the significantly high density the built form appears cramped, contrived and dominated with car parking. The comparable density of the adjacent residential properties to the east and south east are 97dph and 55dph, retrospectively. You should therefore seek to reduce the density of the site.

At present the 3-4 storey apartments in the southern part of the site appears almost as an afterthought and shoehorned into the plot. These apartments are objected to on design ground as they appear cramped, dense and car dominated. As discussed at the meeting, it is advised that a row of terraced houses, of 2-3 storeys, should be explored within this area. These should resemble townhouses with undercroft car parking at ground floor with private amenity above and small rear gardens, creating a mews with an abundance of greenery. This would appear in keeping with the surrounding scale, density and wider Garden City character.

The siting of the taller buildings, to the north of the block and the tallest element closest to the railway line is not objected to in principle. This scheme, however seeks to introduce buildings ranging from 3 – 15 storeys. Within the immediate vicinity of the site the majority of buildings are 3 storeys. In the Design and Access Statement submitted it refers to the Shredded Wheat site, where there is extant permission for a mixed use development. Within the extant permission on the Shredded Wheat site, the most southern building block was 4 to 5 storeys and is currently being built out. The consented Shredded Wheat scheme therefore has a gradual stepping down in building heights to the buildings surrounding the Roche building. The scale of the built form has deliberately been gradually stepped down to the south to respect the building heights to the south of the site.

Whilst the existing building on site is taller than those in the immediate vicinity, the heights proposed are substantially taller and would appear incongruous and would fail to reduce towards

the southern end of the strategic site to respond to existing surrounding properties, in particular the setting of the Roche building. The proposed heights are too tall and fail to respect the stepping down in height as provided as outlined within the Broadwater West Road SPD. The proposed height is therefore objected to.

The nature of the height as proposed would also be highly at odds with the development at the Roche factory site which has a restrained height in line with the Broadwater West Road SPD. It is one of the challenges of this pre-application site in that the opposite side of Penn Way includes buildings which range from a FOG unit to a maximum height of four storeys. Any taller buildings would create a visually separate street scene with the level of difference potentially being too great. The visual separation of tall buildings would be visible when approaching Welwyn Garden City by rail from London. The visual as provided on page 56 shows a scale which is inappropriate for an edge of centre location bordering low rise Garden City residential properties. This would therefore be contrary to Policy SP 9 of the eLP which states that *'Proposals for taller buildings should positively respond to the following matters within their design solution; Clustering with other existing or proposed taller buildings within the immediate and wider area'*. The height of the development must not therefore exceed the height of the buildings in the immediate surrounding vicinity or the existing buildings on site (up to the roof height, not the flue height).

For clarity, the bulk of the building is currently largely limited to the 5-storey element. Within the image on page 37, the maximum building height line gives the impression of a continuous maximum building height, and thereby making the proposal appear only marginally taller. In reality the 35m maximum height is to the top of the flues, which represent a very small element of the overall building footprint. If taking a typical floor height (not in the case of the existing building it is appreciated as this has taller floor to ceiling heights) 35 metres would be comparable to an 11 to 12 storey building. Even the 2-storey plant element is limited to a relatively small extent of the existing building and therefore the main buildings is 5 storeys. Height should therefore not exceed this to ensure the stepped down approach, as identified within the Broadwater Road West SPD is respected and the building height is in keeping with the surrounding built form.

Within the site, the building height would step up and down, with each block having between 5 to 6 different levels. This would appear fairly messy and instead a more restrained use of height changes across the site should be proposed. The buildings, albeit indicative at this stage for the sake of massing diagrams, also appear monolithic. It is considered that where height is considered, it should be in the form of slender buildings with smaller footprints to break down the perceived 'wall' of development. The larger footprint buildings as shown could be considered on smaller building heights.

It is noted, that within the document and plans submitted speculative development has been shown on the distribution depot, which is misleading. As the development has not gained consent, has not been built out and is not the existing scenario of the distribution depot it should be removed from any future documentation and plans. Instead, you must show existing built form in its current form, unless there is extant permission, such as the Shredded Wheat scheme. The distribution depot should therefore be shown in its current form and scale on any future plans.

Similarly, there is concern as to whether there is the potential for incorporation of the trailer storage area to the west of the site, which is understood to be associated with the distribution depot to the north. Logically, this wedge of land should come forward as part of this site as opposed to at a later stage when it could be considered inappropriate for development due to its constraints in relation to the Biopark site proposals and the railway. By including this site, a much more holistic design could be created for the site overall which may also relieve some pressure on the edges onto Broadwater Road as the development could be set back further to the west. If this area of land does not fall within your ownership, you will need to consider the existing use of this area of land and how the built form proposed would relate to it.

In relation to design quality, there are positive elements to the proposed scheme which are aligned with best practice in urban design. This includes a 21m minimum separation distance between blocks and a predominance of dual aspect apartments which is positive and should be retained.

Notwithstanding that, the proposed identity is not strong enough. You need to consider how a development can come forward that truly reflects Welwyn Garden City in a contemporary idiom. The National Design Guide emphasises the importance of placemaking and '*creating a positive sense of place...*' to help '*...to foster a sense of belonging and contributes to well-being, inclusion and community cohesion.*' You must therefore ensure through the use of memorable features or groupings and layout of buildings, spaces, uses or activities a sense of place is created, promoting inclusion and cohesion.

You need to undertake a context study to fully understand which elements and design cues could be accommodated within the emerging design that would make the proposal highly place specific. The site is no longer industrial in nature and the current building offers little by way of design cues to reference with exception potentially of the flues. The development should reference the materiality of the adjacent residential areas and the Garden City as a whole as opposed to an industrial aesthetic. You should therefore include elements such as the Roche Factory townhouses recently completed (discounting earlier phases of this development), the Roche Reception building and its unique style and architecture, and cues from the Garden City itself. It is important that the architectural design of the buildings have a strong contextual link to the historic identity of the Garden City.

Additionally, the ground floor of the blocks require some reconfiguration, as at present there are a number of refuse stores onto the street. This is something you should seek to avoid, and provided that vehicular and servicing access can still be maintained, it would prefer to see these areas being located on side elevations.

As for materials, the current design proposes darker materials on the upper floors of the buildings. Whilst an alternative material to delineate the taller elements is welcomed, it is considered that a dark tone material would actually draw the eye upwards, bringing attention to the height and could also give the impression of the building being 'top heavy'. White bricks could work well and provide a distinctive and interesting aesthetic. Render should also be removed, unless a robust case can be made for its retention.

Further attention and thinking is therefore needed to the materials proposed, as they appear fairly standard and generic in the information provided. You need to demonstrate how the architectural precedents, of which represent contemporary development (which is largely London-focused), are contextual to the Garden City. You should consider how the best elements of these schemes could be taken forward into this proposal with its own identity. As discussed at the meeting, Belle Vue is considered to be a positive example, and the approach to the entrances at Peruvian Wharf are interesting. I would not suggest the use of Seren Park as a positive precedent.

As for the green strategy, the green link along Penn Way on the eastern boundary of the site is focused too heavily around car parking and highway infrastructure and therefore gives the impression of a predominantly hard space. Careful thought needs to be given to how the communal amenity spaces will bleed into the street scene on Penn Way and northwards towards Wheat Quarter and other access routes. More information is required on the proposed design of public open space at the earliest opportunity. Particularly in regards to hard and soft landscaped spaces are proposed and how these join together to form a coherent public realm. This also applies to the proposed terrace spaces where further design information is required regarding how they will operate.

There is concern regarding how the continuum in the landscape treatment between the station and the Biopark could be provided and what level of quality would result. The proposals show that the 'green link' referred to as the key connection for pedestrians to the station and the town centre runs north-south along the western edge of the southern parcel of the Shredded Wheat site. This link is largely a highway route with some planting so may not constitute what could be considered as a key green pedestrian link to the station. If however a more pleasant walking route was wanted one could divert into the weave. My main concern is that whilst the proposal shows some landscaping to its eastern edge, to connect with the route along the edge of the southern parcel of the Shredded Wheat site, this would entail using a section of Penn Way and Otto Road which is not subject to any form of landscape treatment. Thought should be given to how this section between Biopark and the Wheat Quarter could be treated by way of hard and soft landscape treatment to allow a sense of continuity between the sites.

As a final point, you should seek to enhance the appearance of the access road, to create a sense of arrival. Currently the proposed access road is fronted by the side and rears of numerous properties and provides an unattractive setting for pedestrians and as a key entry point to this development. You should ensure the access road is terminated by a high quality feature building and you should introduce more landscaping to create a boulevard appearance in keeping with the Garden City.

To conclude on the urban design matters above, the density and height of the proposed development needs to be reduced significantly. The height of the building should be similar to the immediate surrounding built form and the existing buildings on site. Any future proposal should ensure the density is reduced, so that the layout and appearance of the scheme is not cramped and dominated with parking. Instead soft landscaping should flow throughout the site, with limited car parking visible. Also, further consideration is required towards the architectural style and material to ensure you integrate a contemporary idiom with the Garden City and the surrounding buildings to create a sense of place.

Amenity

All new development should create and protect a good standard of amenity for buildings and external open space in line with the Council's SDG. The impact of the proposed development on the residential amenity of neighbouring dwellings is considered in terms of access to day/sun/sky light, privacy, overshadowing, overbearing and prominence.

The impact of cars entering, exiting, starting and manoeuvring along the access road has the potential to create noise disturbance, air pollution and light pollution which will also be a material consideration. Without details of elevational treatments, scale and massing, further consideration of these issues would need to take place at a later stage to make a more informed judgement.

The amount of sunlight reaching an apartment significantly affects the amenity of the occupants. Full extracts from any forthcoming sun and daylight / shading studies are provided so that the full extent of shadowing is shown – at present the diagrams provided in the DAS cut off the full extent of the shadowing to the surrounding areas.

From the indicative drawings submitted, the apartments are designed to maximise natural surveillance of streets, open spaces and play areas. Accordingly, the blocks and buildings will overlook the public realm. You should ensure that entrance points are clearly indicated, well lit, and overlooked by adjoining dwellings. Particular attention should be given to the security of ground floor apartments and access to internal and external areas. This will help ensure occupants and their visitors have a sense of safety and security. All homes should be built and accredited to the police preferred security standard that is 'Secured by Design' (SBD). This would help reduce the opportunity for crimes to occur at the location.

The recreational needs of children and adults must be considered as part of communal amenity spaces. The landscape design and orientation of play areas can contribute significantly to their amenity value. You should ensure there is a sufficient amount of open space and play facilities provided on site. You will also need to ensure that noise created from the play area does not result in adverse harm upon the amenity of surrounding private properties.

The site is in close proximity to various noise sources, particularly the railway. It is preferable that natural means of ventilation are used within properties rather than mechanical ventilation through the use of good acoustic design. You should ensure that internal noise levels will need to meet those within BS8233:2014. Any properties impacted by commercial or industrial noise will need a higher standard of glazing/ventilation which provides internal noise levels better than those within BS8233:2014.

Where opening windows raises the internal noise levels above those within BS8233 (or the better standards required for commercial/industrial noise) then mechanical ventilation will need to be installed which provides ventilation rates found within The Noise Insulation Regulations 1975. Alternatively to this, showing that the applicants preferred ventilation system will not lead to overheating through the use of a SAP assessment conducted with windows closed will be accepted. This should be carried out in a realistic manner as people are not going to live with curtains or blinds closed the whole time. Likewise, any plant or equipment to be installed such as for air conditioning, will need to be 10dB (LAeq) below the background noise level (LA90) at the nearest residential properties (5dB below the background noise level if evidence is provided which shows that no tonality is present).

You should also submit an air quality assessment demonstrating how prevailing air quality has been considered and how air quality will be kept to an acceptable standard through avoidance and mitigations.

Housing Mix and Tenure

As for the housing mix, Policy SP 7 of the eLP also states that proposals for 11 or more new dwellings should demonstrate how the mix of tenure, type and size of housing proposed on sites will reflect the Council's latest evidence of housing need and market demand and contribute towards meeting the varied needs of different households. The most up to date evidence is found in the Technical OAN paper (June 2019) which has been produced in connection with the Local Plan examination. This states that the implied size of housing required (2013 – 2032) is as follows:

1 Bed	2 Bed	3 Bed	4+ Bed
14%	23%	41%	22%

This paper also sets out that the implied type of housing required (2013 – 2032) is 77% houses and 23% flats. A provision housing mix and tenure has been provided policy compliant and to satisfy the local housing needs. The proposed development includes approximately 66 1-bed units; 198 2-bed units; 76-3 bed units. Whilst this is a provisional housing mix, this would be supported.

The housing tenure is also provisional at this stage. However, to be policy compliant 102 (30%) affordable housing units should be proposed. Due to the acute need in Welwyn Garden City for social housing, you should introduce 87 (85%) affordable rented units and 15 (15%) intermediate units. Policy SP7 of the eLP states that proposals should demonstrate how the mix of tenure, type and size of housing will reflect the council's latest needs evidence. If you cannot deliver the amount of social rent required you need to demonstrate why with a robust justification and viability information to demonstrate the scheme is not viable with that required contribution of social

housing. Without this information, and a percentage of affordable housing in line with the above, the scheme would not be supported.

Highway, Access and Car Parking

The Interim Policy for Car Parking Standards and Garage sizes the Council has agreed to treat its existing car parking standards as guidelines rather than maximums. This means that higher or lower car parking standards than those set out in the SPG can be proposed (by landowners, developers, etc) and determined (by officers and elected councillors) on a case-by-case basis taking account of the relevant circumstances of the proposal, its size context and its wider surroundings, as well as the Framework guidance set out above. The onus is therefore on the developer (yourselves) to demonstrate through transport information submitted alongside your planning application that a greater or lesser level of car parking provision is appropriate.

It was expressed at the meeting a total of 150 car parking spaces are being proposed on the surface and over two storeys within the basement of main building (depending on structural engineer confirmation).

The SPG requirements are 0.75 per 1 bed dwelling, 1 space per 2 bed dwelling, 1.5 space per 3 bed dwelling and 1 long term cycling space per unit (if no storage provided). Applying these standards to the proposal will equal a total of 362 car parking spaces. In accordance with the Council's Supplementary Planning Guidance, the site is located in Zone 2 (where as a guideline, 25-50% of standards would apply). The proposed amount of car parking would be in line with the standards, at approximately 41% of the car parking provision, and would therefore be within the 25-50% standards within Zone 2. In addition to car parking, one long term cycle parking space is required for each flat. Details of the level of cycling spaces and location must be provided.

Due to the number of residential units and the need to satisfy car parking standards, the layout of the development is dominated by car parking. By reducing the number of residential units, it would reduce the amount of car parking required, alleviating the dominance of car parking within the street scene. You should therefore ensure where possible car parking is not visible within the street scene.

As discussed at the meeting I advise you seek pre-application advice from the Highways Authority directly and any concerns they raise you should address. Any meetings you have with them could you please let me know as I will need to attend.

Other Matters

Ecology

You should be aware that the government are intending to introduce an Environment Bill, which would result in a new duty for developers to deliver 10% net biodiversity gain in new schemes. This strengthens the current requirement in the Framework, that planning policies and decisions "should" enhance the environment by "minimising impacts on and providing net gains for biodiversity".

Having said that, it has not yet been adopted, so you need to prove no net loss or net gain to biodiversity. A preliminary ecological survey will be required to assess the presence and potential impacts on wildlife (including any potential for protected species), the wildlife site adjacent the development and identify the need for any mitigation (e.g. a buffer to the wildlife site). You should think about the inclusion of bird boxes, bug houses and ensuring it is a hedgehog friendly development. May I also remind you of your responsibilities to take into account the advice of

Natural England under the above legislation, and your biodiversity duties under s40 of the NERC Act 2006.

Surface Water Drainage

Policy R10 of the District Plan requires new development to incorporate water conservation measures wherever applicable, and paragraph 165 of the Framework states that major development should incorporate sustainable drainage systems unless there is clear evidence that this will be inappropriate. Given the site's location with an Outer Ground Source Protection Zone, SuDS for surface run-off from roads, car parking and public or amenity areas should be suitably designed & the requisite treatment stages to prevent the pollution of groundwater.

You are advised to discuss your proposals with the Lead Local Flood Authority (Herts County Council in this case) prior to the submission of any application to ensure that the proposed development accords with their policies and guidance. Further information can be found on the LLFA's policies and guidance using the following link:

<https://www.hertfordshire.gov.uk/services/recycling-waste-and-environment/water/managing-flood-risks.aspx>

Accessible and Adaptable Housing

Policy H10 requires at least 20% of all new dwellings on sites involving 5 or more new dwellings to meet Building Regulations Part M4(2) standards for 'accessible and adaptable dwellings' the delivery of which should be distributed across market and affordable tenures. It is considered that this proportion may vary where a proportion of dwellings are proposed to meet Part M4(3) standards for 'wheelchair user dwellings'. In addition, a proportion of dwellings should be built to lifetime homes standard. Any future application will need to demonstrate this.

Impact on Local Services

In accordance with Policy IM2 of the District Plan, in order to satisfy the sustainability aims of the Plan and secure the proper planning of the area, development will be required to provide for the infrastructure, services and facilities which are directly related to it and necessary to the granting of planning permission.

The Planning Obligations Supplementary Planning Document (Feb 2012) provides detailed guidance on the type and scale of planning obligations that may be sought. Having regard to the size of the site and scale and nature of the development proposed, obligations will be sought for green space, play facilities and waste and recycling to mitigate the impact of the proposed development, amongst other services. Please note, that due to a lack of play facilities within the area you should look to integrate play facilities within the open spaces onsite.

The Growth Team, Hertfordshire County Council have commented in respect of obligations relating to the impact on service provision of HCC services (further information can be found in the Planning Obligations Guidance – Toolkit for Hertfordshire Jan 2008). They have advised that based on the details of the development proposed they will be seeking contributions towards childcare services, primary education, secondary education, public health, waste services, youth services and library services. It is likely that contributions will also be sought from the highway authority to mitigate the impact of the development from a highways perspective.

I do have concern on how additional primary and secondary school children can be accommodated within Welwyn Garden City. Currently it is my understanding that there is limited capacity at existing education sites for any more forms of entry. I have provided Hertfordshire County Council with the indicative housing mix you shared. This will help understand how and

whether Hertfordshire County Council can find a solution to accommodate primary and secondary school children. Once I hear back I will inform you of the County Council's comments.

Environmental Statement

The development does however fall under 10b (urban development project) of Schedule 2 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (the Regulations). Given that the proposed development is over 150 dwellings the development would exceed criteria (i) of Schedule 2 development. As outlined in the National Planning Practice Guidance (PPG) not all Schedule 2 Development has an impact or impacts that require an EIA to be undertaken and each case should be considered on its own merits in a balanced way. However, given the cumulative development within the area and the development proposed within this scheme, it is likely that an EIA is required.

Other Matters

Also, in response to Dame Hackitt's independent review of building regulations and fire safety and Government's 'Building a Safer Future' planning applications for multi-occupied residential buildings of 18+ metres or 6+ storeys (whichever comes first) must be accompanied by a Fire Statement. This should include fire safety issues including vehicle access to building and water supplies in event of fire.

Conclusion

To conclude on the above, the development in its current form has not demonstrated that the research facility is no longer needed, that it is being reprovided elsewhere or provided evidence that it has been marketed, and therefore the principle of development is considered unacceptable.

In addition to this, due to the height of the development proposed, it is considered to result in less than substantial harm to the heritage assets within the area. The density and height proposed would also result in a scheme contrary to the design principles of Broadwater Road West SPD and out of keeping with the character of development within the immediate vicinity, which is primarily 2-4 storeys in height. As a result of the high density the built form appears cramped, contrived and dominated with car parking. For these reasons, the density and height proposed would be objected to.

I also have concerns regarding whether there will be the ability to accommodate additional primary and secondary school children. Further information is also required, for example regarding how soft landscaping has been integrated within the built form. You should ensure you address all comments and provide information where requested.

It is recognised that, the Local Planning Authority does not have a five year housing land supply, so the planning balance would be undertaken in favour of sustainable development. As discussed at the meeting, with the emphasis from Government on achieving high quality designed places, there are numerous appeal decisions whereby a lack of a five year housing supply has not outweighed the harm of planning matters such as a poor design. In this instance, if the scheme were to be submitted in its current form, the harm identified from the proposed development would not be outweighed by a lack of a five year housing land supply. The proposed development in its current form would therefore not be supported.

Please note that pre-application advice has not been sought from Environment Agency or the Lead Local Flood Authority as they each provide their own pre-application advice service, subject to a fee. This pre-application response includes comments for the Highways Authority, however if

you want them to comment on detailed plans I strongly advise you contact them directly, as this is also subject to a fee.

Notwithstanding the above concerns, if you were to continue with these proposals, I also suggest you discuss the proposal with members of the public, and ward Councillors before submitting the application as we will consult them once the application is received

This advice represents my personal professional opinion and is given without prejudice to the decision of the Local Planning Authority in respect of this enquiry or any future application which may be submitted. Please note that there may be other issues which come to light when a planning application is submitted and consultations carried out.

Should you have any questions, please contact me.

Yours sincerely,

Ms Clare Howe

Principal Major Development Management Officer

Appendix 3 - Second WHBC Pre-Application Response

**Colin Haigh
Head of Planning**

Mr M Westcott
hgh Consulting
45 Welbeck Street
London
W1G 8DZ

Reply To: address as below
Direct Tel: 01707357000
Email: planning@welhat.gov.uk

10th September 2020

Dear Mr Westcott,

Application Reference: 6/2020/0804/PA

Proposal: Erection of 297 residential units with associated private and communal amenity space, public open space, car and cycle parking and landscaping

Location: Biopark Broadwater Road Welwyn Garden City AL7 3AX

Thank you for your pre-application enquiry which was received on 24th July 2020. Following our meeting on the 18th August please see below my comments relating to your proposal. You should read this letter in conjunction with the first pre-application dated 1st July 2020 and ensure all matters raised within both letters are addressed prior to the submission of a future planning application.

As outlined within the Planning Statement submitted you have made several alterations since the initial pre-application. These changes include, but are not exclusive to, reducing the residential units from 340 to 297, reducing the maximum height from 15 storeys to 9 storeys and introducing townhouses to the south of the site. The residential units would be provided across three apartment's blocks ranging from 5 to 9 storeys in height and 8 x 3 storey townhouses. The indicative housing mix comprises of 102 x 1-bed (34.4%); 122 x 2-bed (34.3%); 64 x 3-bed (41.4%) and 8 x 4 bed (2.7%) and a car parking ration of 0.5 spaces per unit.

Principle of Development

Within the previous pre-application I advised you to provide further marketing evidence to demonstrate the Biopark premises are no longer suitable for B1b use (or can be re-provided elsewhere) and no longer required to meet future employment land needs or that there is a lack of demand for them.

To address this comment you have provided a Marketing Report undertaken by Savills. The report states that the fundamental problem in letting the BioPark is the geographical location, the buildings isolated position and lack of demand. The report continues stating that it is not a matter of upgrading the building, as that option is not viable as there is no guarantee that it would generate significant new demand, due to the inappropriate location. It also notes, that Heptares who were at the BioPark took up Gilead's previous building in 2016, thus relocating.

Minded of the information provided within the Marketing Report I consider this sufficient evidence demonstrating that the Biopark premises are to be no longer suitable for B1b use (or can be re-provided elsewhere) and no longer required to meet future employment land needs or that there is a lack of demand for them.

Welwyn Hatfield Borough Council, The Campus, Welwyn Garden City, Herts AL8 6AE
DX30075, Welwyn Garden City 1

Tel: 01707 357000
www.welhat.gov.uk

On submission of any future application, if the eLP has yet been adopted, I advise you submit the Marketing Report to support your case, alongside any other supporting evidence which demonstrates that the existing land or premises are no longer required to meet future employment requirements and business and community needs. Please note, subject to the date of submitting a planning application, if there is a timely delay since the initial undertaking of the Marketing Report it will need updating.

As for the principle of residential development on this site, as the site is not allocated for housing within the existing District Plan it would be considered windfall housing so Policy H2 of the District Plan and Policy SADM1 of the eLP are relevant. The principle of development to residential development on the site is not objected to, subject to sufficient information satisfying criteria (v) of Policy H2 of the District Plan and all other relevant planning policies being satisfied.

Further to the above, the Annual Monitoring Report 2018/19 states the Council has a 2.34 years housing land supply. This development would therefore provide a contribution towards the overall supply of new homes in the Borough. The Planning Statement submitted outlines that the proposal would provide a significant contribution towards the Council's 5-year housing land supply and affordable housing need. On submission of an application you should provide a phasing plan, including the housing trajectory. You also advised that your client is willing for the Local Planning Authority to consider imposing a shorter time period, potentially 1-2 years, when development shall commence to ensure that proposals for housing development are implemented in a timely manner. You should outline this in the Planning Statement of any future planning application submitted to assist in the planning balance.

Heritage Assets

A draft Heritage, Townscape and Visual Impact Assessment (HTVIA) has now been provided (dated July 2020). Within the HTVIA it addresses the heritage assets potentially impacted by the proposed scheme including Welwyn Garden City Conservation Area to the west of the site; the Grade II listed former Roche office building (list entry no: 1348142) to the east of the site; the Grade II listed former Shredded Wheat factory (list entry no: 1101084) to the north east of the site; and the Grade I listed Hatfield House and its associated parkland (Hatfield Park Registered Park and Garden, registered at Grade I) which also includes the Old Palace (Grade I listed) and, immediately to the west of Hatfield Park, St Etheldreda's Church (Grade I listed) which are located approximately 4km to the south of the site.

As noted previously, there are no objections to the demolition of the existing building or the residential redevelopment of the site. As for the revised heights (now at a maximum of 9 storeys), these have addressed some of the previous concerns regarding the impact of the proposals on the settings of the above heritage assets.

Initial views and CGI images have been provided as part of the draft HTVIA following the agreement of key viewpoints which are representative of the settings of the heritage assets. With the scheme now at a maximum height of 9 storeys, these CGI views demonstrate that the impact on the settings of the heritage assets is likely to be minor. From many of the viewpoints the lower height of the proposed scheme is not visible or is of limited visibility. In some cases, there is a potential opportunity to enhance some views through a well-designed scheme utilising sympathetic materials and detailing. However, whilst it is understood that the HTVIA is in draft stage, as discussed at the meeting, some of the CGIs provided do not account for filtered views through trees. Some of the CGI views show the development blocked by trees but this does not account for winter views (or potential future loss of trees). Subject to improved CGI views to account for filtered views through trees the revised maximum height of the proposed scheme has addressed some of the previous concerns regarding heritage assets.

Whilst CGI images or wireframe diagrams from the key viewpoints at Hatfield House and Park have not been provided, it is unlikely that the 9 storey height will be problematic given the distance and the extent of existing development. It is probable that the proposed scheme will form part of the Welwyn Garden City backdrop in views from Hatfield House and Park, being partially filtered by trees and intervening development. At 9 storeys it is unlikely to break the tree line in views north from Hatfield House and Park and, if well designed to incorporate external materials of appropriate colours, may not be intrusive in these views. Going forward you should however still consider the impact on views fully to ensure that these assumptions are correct.

Urban Design

In terms of the site layout this has been revised creating a more interesting block layout which is also more legible and less 'busy' than the previous iteration. It is positive to note that there is a considerable percentage of dual aspect units which have been maximised wherever possible, and the number of single aspect units are minimised with zero north facing single aspect units provided. The introduction of the commercial hub at ground floor is also welcomed, as this will help to bring a degree of mixed use to the development, providing activation across the day and creating a 'centre of focus' for the development.

It is noted that a row of townhouses with integrated parking are proposed in the area previously occupied by small apartment block units. The row of townhouses will be terminated by a single small apartment block on the corner of the Biopark access road. This is aligned with earlier pre-application advice that this arrangement aligns much easier with the context of this area, particularly the 2/3 storey semi-detached units and small apartment blocks in the existing residential area to the south and east. It is apparent that there could be an issue of proximity between the townhouse frontages and the existing 3 storey apartment block. Design ideas should be provided going forward which outline how this could be dealt with to ensure no loss of privacy for existing residents.

As for the existing lorry park associated with the distribution centre, it is understood from discussions that it is not available for development as part of this application. This is unfortunate, as it creates a difficult edge to deal with from the perspective of noise and overlooking from residential properties, but also in terms of creating a coherent development which appropriately addresses the railway line. Whilst it may be that these conversations are considered to have been exhausted, you should continue dialogue regarding this area of land where possible, as retrospective development of this area will be challenging.

Turning to the massing and height proposed, whilst the height has been reduced it is considered that the maximum height of 9 storeys is still too tall and overbearing. Consideration needs to be given towards the guidance in the Broadwater Road West SPD (2008), which requires building heights to decrease towards the south of the Shredded Wheat site to respect the scale of the listed Roche building, the landmark qualities of the silos and the residential buildings to the south. This is a design principle which should still be considered, to ensure the development creates an attractive new townscape in the Garden City's former industrial area which respects and responds to the settings of the two listed buildings and the existing residential buildings within the area.

At the meeting you commented that the development has now been reduced to the height of the existing building, addressing the comments from the previous pre-application. Whilst this is not disputed, the overall height and massing proposed is considered bulkier than that existing. This is demonstrated on page 41 of the Design and Access statement where the western elevation is viewed from the railway line and would appear as a distinct wall of development on approach to Welwyn Garden City due to the low heights of the existing built form to the south of the site. This development is also an opportunity to improve the townscape by lowering the height and introducing a high quality design. Therefore, you should reduce the maximum height and introduce a 'step' in height between the southern end of the site and the northern edge towards the Wheat Quarter. This will help bring height away from the most sensitive townscape locations and towards newer developments where

taller heights have been accepted, as well as tying in with the townhouses proposed for the 'dog leg' area of the site more successfully.

Concern was also raised regarding the pitch of the townhouse roofs and how these may be noticeably taller than the surrounding existing buildings. Further long-sections which show the height of the townhouses in relation to the existing dwellings to the south of the townhouses are required to ensure the height is satisfactory. Reason being, is there is concern that the step up in height from the existing dwelling and townhouse should be reduced to ensure it is more in keeping and sympathetic.

It is recognised that reducing the height of the apartments in particular would result in a loss of residential units. At the meeting you commented that a reduction in unit numbers may result in an unviable scheme. At present, the scheme presents a total of 72 three/four bed units. A reduction in the number of three bed units and increase in 1 or 2 bed units should help to achieve development viability as a result of reducing heights. If you were to reduce the number of 3 bed units I advise you provide robust justification within your Planning Statement. It is also worth mentioning that there may be the opportunity to infill the corner of the southernmost block to create a 3-sided perimeter block, whilst maintaining undercroft pedestrian access to allow for a high level of pedestrian permeability. You should however ensure the infill does not reduce the natural light afforded to the internal courtyard and that sufficient open space is retained onsite.

As for the architectural design, this has evolved positively in terms of the elevational treatment. There are some positive moves in terms of creating a distinctive built form, including the inclusion of positive precedents such as Belle Vue. Another positive includes the small apartment block with the curved frontage onto the Biopark access road which has a strong art deco emphasis whilst being contemporary in style and providing a strong vista. The use of pilotis are also supported and I welcome the opportunity to consider how these could be extended vertically, whether physically or through the continuation of material or patterning is welcomed to add interest and distinction.

Notwithstanding the above, further work is required to the design to help it reinforce its location within the Garden City. A more developed context study should be undertaken and included in future pre-application discussions to show how influences of the Garden City have been interpreted in a contemporary manner at this site. I advise you look at the best architectural elements the Garden City has to offer, rather than the existing immediate context to the south, or the southern parcel of the Wheat Quarter currently being built out.

In addition to this, at present the buildings include generic flat roofs to the towers, and there is the opportunity to add significant interest to the roofline of this development by providing variation and distinction through a more bespoke treatment. You should investigate whether there is the opportunity to take the theme of the mansard roofs which proliferate in the Garden City and reference them in a contemporary form, potentially utilising tile bricks as a material treatment to add softness and reference back to the hung tiles which are also strongly evident in the Garden City. You should also consider if these roof treatments could be replicated, or a similar treatment applied, to the roofs of the townhouses.

As for the landscaping and public realm, the proposed development has created a much softer and more welcoming pedestrian environment and the removal of vehicular parking, with the exception of car club spaces which are located within the public realm for ease of accessibility and visibility, from the site frontage is positive. The provision of parking entirely within the basement of the site is welcomed and this will contribute significantly to the creation of an attractive public realm. In addition to this, the introduction of a tree-line boulevard along the access road from Broadwater Road is supported and the consideration for how the public realm and pedestrian/cycle network towards the connection between the Biopark site and the wider SPD area is encouraging. You should also ensure any boundary treatments are designed through the use of hedgerows or soft landscaping to reflect the Garden City, whilst enhancing biodiversity on the site.

It is noted that a loading bay is proposed within Penn Way, and whilst this is an appropriate location for such a facility, design intent should be for the bay to be 'read' as an area of public realm for pedestrians, and not a hard engineered loading bay given the relatively low periods of time that the bay will be occupied by a vehicle. As discussed, the route between this site and the town centre via the Wheat Quarter requires crossing adopted highway, so I advise you submit a full landscape strategy for Penn Way.

To conclude on the urban design matters above, the height of the proposed development needs to be reduced significantly. The height of the building should be similar to the immediate surrounding built form and the existing buildings on site. Also, further consideration is required towards the architectural style and material to ensure you integrate a contemporary idiom with the Garden City and the surrounding buildings to create a sense of place.

Amenity

In terms of amenity of future occupiers, this pre-application a supporting note has been provided regarding the sunlight assessment written by Anstey Hornes. I can confirm that I am satisfied with the approach proposed by Anstey Horne for the sunlight assessment. It is noted in the sunlight assessment that balconies and/or other design features may limit the light availability at the centre point of the window. You also need to ensure the buildings within the corner points adjacent other blocks have sufficient light and that all properties and internal courtyard spaces receive a sufficient amount of natural daylight. Particular care is also needed where windows are located on lower floors that may be overshadowed by adjoining buildings.

In the previous pre-application comments were made regarding back to back distances of the apartments. Within this pre-application you have identified these, which has been useful. The majority of distances retained are considered reasonable and appropriate minded of the height of the buildings. As raised above there is concern regarding the distance between the townhouse adjacent the existing 3 storey building and the treatment on the elevation of the existing building. After the meeting a photograph was shared identifying windows on the rear elevation of the existing building. It would be useful in any further pre-application if you could identify the distance between these buildings and how you intend to ensure there is no overlooking or overbearing impact upon the existing and future occupiers.

You should ensure all dwellings meet the Nationally Described Space Standards, unless it can be robustly demonstrated that this would not be feasible or viable, as required under Policy SADM11 of the eLP.

In regards to noise nuisance as suggested at the meeting, if you provide any information you have regarding noise and air quality mitigation measures at the next pre-application I will consult Environmental Health to review and comment on it. This should ensure the planning application is a smoother process. I also note that you confirmed an Air Quality Assessment of the proposals will be undertaken and submitted in support of a future planning application.

Approximately two thirds of the site is given over to open space which will be landscaped and provide an attractive environment for residents within the development and others nearby. The proposal also includes preliminary allocation of three play spaces within open spaces on the site. It is understood from our pre-application meeting that detailed design of these spaces will be further explored with the landscape architect, which is encouraging. You should ensure an appropriate amount of public open space that is well sited and designed to help create and enhance a sense of place. The public open spaces should be coherent, attractive, multi-functional, safe, inclusive and utilise high quality soft and hard landscaping. The preliminary location of the play spaces at this stage are supported. Careful attention will need to be paid to ensure the play space to the north of the site is safe and secure given its proximity to the access road. As required within Policy SP9 of the eLP you should

ensure these open spaces promote health and wellbeing, with play spaces being attractively designed to encourage their use.

Highway, Access and Car Parking

As I mentioned in the previous pre-application the SPG requirements are 0.75 per 1 bed dwelling, 1 space per 2 bed dwelling, 1.5 spaces per 3 bed dwelling, 2 spaces per 4 bed dwelling and 1 long term cycling space per unit (if no storage provided). It has come to my attention that, Block F and the townhouses would fall within Zone 3, whereby the SPG requirements are 1.5 for a 2 bed dwelling, 2.25 for a 3 bed dwelling and 3 spaces for a 4 bed dwelling. A maximum of 36 car parking spaces are therefore required for Block F and the townhouses, whilst a maximum of 288 spaces are required for the apartments. As you are aware, within Zone 2, 25-50% of the maximum standards can be provided and within Zone 3, 50-75% of the maximum standard can be provided. You should therefore seek to provide between 90 – 171 car parking spaces for the residential units across the entire site.

The development now includes a community hub, shown as a double height gym with an ancillary café. When referring to the SPG a fitness centre (use class D2) requires 1 space per 15sqm per ground floor area. As the commercial element is 82.6sqm and falls within Zone 2, the car parking provision should be between 1-3 car parking spaces for the commercial element. As a result, the total car parking provision on the site could range between 91 - 174 car parking spaces, subject to sufficient justification being provided.

The proposal includes 156 car parking spaces, which includes 16 spaces associated to the 8 town houses and 140 spaces for 289 apartments. It is acknowledged that the proposed amount of car parking, including blue badge bays, would be in line with the standards, at approximately 52% of the car parking provision, and would therefore satisfy the above standards. The development does not however take into consideration car parking for visitors or employee(s) of the community hub. Furthermore, as I mentioned at the meeting, there is poor connectivity east to west resulting in residents becoming more car dependent for such journeys.

I advise you consider increasing the number of car parking spaces to ensure there is sufficient car parking for residents, visitors and staff members of the community hub. At the meeting, and as mentioned in my email, the car parking ratio currently proposed is less than that approved at the Shredded Wheat Quarter, which is closer to the town centre and sustainable modes of transport. You should therefore provide a greater car parking standard, if not similar subject to robust justification. For comparison purposes, the south of the Shredded Wheat site is predominantly for residential housing and car parking was approved at approximately 60% of the maximum standard, with the inclusion of visitor spaces. If you were to provide one space per unit, albeit with some of the spaces allocated for visitor parking and employee(s) at the community hub, this would equate to 63% of the standard. You therefore need to consider increasing the car parking provision to allow for visitor car parking and employee(s) at the community hub. You should also ensure the spaces allocated for visitor parking, disabled parking and electric charging are identified on the car parking plan submitted.

When considering the location of the additional car parking spaces you should ensure that it remains well obscured from the streetscene to prevent the site becoming dominated by cars. This could be achieved by extending the car park basement, subject to costs. As for the location of the car club this is appropriate as it is easily accessible for people to use and is a positive aspect of this scheme, which is supported.

In addition to car parking, one long term cycle parking space is required for each flat. The location of the cycling stores are considered acceptable and easily accessible for residents of the site. Details of the level of cycling spaces must be provided. If you are intending on providing no, albeit minimal visitor car parking, I advise you include cycle parking within the site accessible for visitors. You will need to ensure the cycle storage is secure.

As noted previously, the Council has agreed to treat its existing car parking standards as guidelines rather than maximums. This means that higher or lower car parking standards than those set out in the SPG can be proposed (by landowners, developers, etc) and determined (by officers and elected councillors) on a case-by-case basis taking account of the relevant circumstances of the proposal, its size context and its wider surroundings, as well as the NPPF guidance set out above. The onus is therefore on you to demonstrate through transport information submitted alongside their planning applications that a greater or lesser level of car parking provision is appropriate.

As discussed at the meeting I advise you seek pre-application advice from the Highways Authority directly and any concerns they raise you should address. Any meetings you have with them could you please let me know as I will need to attend.

Housing Mix and Tenure

The proposed housing mix has changed since the initial discussion. The proposed housing mix comprises of 102 x 1-bed (34.3%); 122 x 3-bed (41.4%); 64 x 3-bed (21.5%); and 8 x 4-bed (2.7%). The housing mix now maximises the number of 2+ beds and includes the introduction of the 4-bed townhouses. As identified through the Local Plan examination there is a greater need for 2, 3 and 4 bed units, so the introduction of 4 bed units is supported. As discussed at the meeting, if you were to provide more 1 or 2 beds in place of 3 beds, you will need to provide justification why.

In regards to the housing tenure, you should ensure Policy H7 of the District Plan requires a minimum of 30% subsidised housing to be provided. Policy SP 7 of the emerging Local Plan echoes this. Policy SP17 (Mixed Use Development Site at Broadwater Road West) of the eLP also seeks a wide mix of housing types, sizes and tenures, including a minimum of 30% of units as affordable housing within the Opportunity Area. As part of the overall housing target, a proportion of new homes built in the borough will be for affordable housing. Subject to viability, you should ensure 30% (59 units) affordable housing provision is provided. Without social housing you will need to provide a robust justification and will likely be required to provide viability information to demonstrate that the scheme is not viable with the contribution of social housing.

Policy H10 (Accessible Housing) of the District Plan requires developments involving 5 or more dwellings to secure a proportion of dwellings to be built to lifetime homes standard. Policy SP 7 of the eLP states at least 20% of all new dwellings on sites involving 5 or more new dwellings to meet Building Regulations Part M4(2) standards for 'accessible and adaptable dwellings' the delivery of which should be distributed across market and affordable tenures. It is considered that this proportion may vary where a proportion of dwellings are proposed to meet Part M4(3) standards for 'wheelchair user dwellings'. This development proposes 28 units (9.4%) as M4(3) wheelchair user dwellings and the remainder to meet M4(2) standards for accessible and adaptable dwellings, exceeding the requirements of Policy SP 7 of the eLP, which is supported.

Ecology

As previously mentioned, the government are intending to introduce an Environment Bill, which would result in a new duty for developers to deliver 10% net biodiversity gain in new schemes. Policy R11 of the District Plan states all new development will be required to demonstrate how it would contribute positively to the biodiversity of the site. The application site is currently dominated with industrial buildings and hardstanding. The proposed development seeks to introduce soft landscaping and green roofs, so is likely to result in a net biodiversity gain, which if the case, would be supported. You should ensure a preliminary ecological survey is undertaken and mitigation measures proposed where necessary.

Environmental Statement

At the meeting you informed me that a formal EIA screening opinion will be sought. I will therefore await the submission of this to determine whether the proposal is considered EIA development.

Other Matters

In my initial pre-application I discussed matters relating to the impact upon local services, need for a Fire Statement and other statutory consultees you should seek direct consultation with. Within the Planning Statement you have confirmed that the requirement of a Fire Statement is noted and that Heads of Terms will be further defined in consultation with the Growth Team during the planning application stage. You have also acknowledged that you will enter pre-application discussions with the Highways Authority and the Lead Local Flood Authority. I will not therefore expand on these matters as it seems you intend to address my comments from the initial pre-application, which is supported.

Conclusion

To conclude on the above it is considered that the proposed height fails to respect and relate to the character and context of the residential properties surrounding the site and would be contrary to the design principles of Broadwater Road West SPD. As the development is considered to have an adverse impact on the character of the surrounding area and is contrary to design policies the density of the development is also objected to. There is also concern regarding the amount of car parking proposed, which you should address or provide stronger justification. I advise you address the points of concern raised within the meeting and outlined further within this letter.

As I mentioned at the meeting it is recognised that the Local Planning Authority does not have a five year housing land supply, so the planning balance would be undertaken in favour of sustainable development. As discussed at the meeting and in my previous written response, with the emphasis from Government on achieving high quality designed places, there are numerous appeal decisions whereby a lack of a five year housing supply has not outweighed the harm of planning matters such as a poor design. In this instance, if the scheme were to be submitted in its current form, the harm identified from the proposed development, namely the height and density proposed, it would not be outweighed by a lack of a five year housing land supply. The proposed development in its current form would therefore not be supported.

This advice represents my personal professional opinion and is given without prejudice to the decision of the Local Planning Authority in respect of this enquiry or any future application which may be submitted. Please note that there may be other issues which come to light when a planning application is submitted and consultations carried out.

Should you have any questions, please contact me.

Yours sincerely,

Ms Clare Howe

Principal Major Development Management Officer

**Appendix 4 - Third WHBC Pre-Application
Response**

**Colin Haigh
Head of Planning**

Mr M Westcott
hgh Consulting
45 Welbeck Street
London
W1G 8DZ

Reply To: address as below
Direct Tel: 01707357000
Email: planning@welhat.gov.uk

19th November 2020

Dear Mr Westcott,

Application Reference: 6/2020/2805/PA

Proposal: Erection of 289 residential units with associated private and communal amenity space, public open space, car and cycle parking and landscaping

Location: Biopark Broadwater Road Welwyn Garden City AL7 3AX

Thank you for your pre-application enquiry which was received on 26th October 2020. Following our meeting on the 30th October please see below my comments relating to your proposal. Please read this letter in conjunction with the pre-application written response dated 1st July 2020 and 10th September 2020, including the agreed minutes of the design workshop shared on the 2nd October 2020. The matters raised within each letter should be addressed prior to the submission of a future planning application.

In response to the most recent pre-application advice you have reduced the number of residential units from 297 to 289. The proposed housing mix now comprises of 134 x 1-bed (46%); 125 x 2-bed (43%); 22 x 3-bed (8%); and 8 x 4-bed (3%). Within the Planning Statement submitted you also raise other changes including moving the massing towards the western edge, reducing the height of Blocks C&D from 9 to 8 storeys amongst other matters. Car parking also equates to a ratio of 0.65 spaces per unit.

Principle of Development

The principle of development has been discussed within the previous pre-application. The District Plan seeks to retain the site as a Research and Development site, however within the emerging Local Plan it is allocated for residential development.

At the time of writing this response, due to the stage of the eLP limited weight can be afforded to the site allocation. For this reason, you previously submitted a Marketing Report to address Policy EMP1, EMP2 and EMP3 of the District Plan. The report demonstrated that the Biopark premises is no longer suitable for B1b use (or can be re-provided elsewhere) and unlikely to be sustainable due longer required to meet future employment land needs or that there is a lack of demand for them. In line with my advice in my most recent written response I note you intend to submit the Marketing Report with the forthcoming planning application.

At paragraph 7.7 of your Planning Statement you refer to the 2017-18 Annual Monitoring Report (AMR), which stated the borough's housing land supply is 3.63 years. Please note, the Local

Planning Authorities most recent AMR 2018-19 concludes that the borough's housing land supply is now 2.34 years.

As I have mentioned in previous written advice, you acknowledge in your Planning Statement that the proposal would provide a significant contribution towards the Council's 5-year housing land supply and affordable housing need. On submission of an application you should provide a phasing plan, including the housing trajectory. You also advised that your client is willing for the Local Planning Authority to consider imposing a shorter time period, potentially 1-2 years, when development shall commence to ensure that proposals for housing development are implemented in a timely manner. You should outline this in the Planning Statement of any future planning application submitted to assist in the planning balance.

Heritage Assets

In the previous pre-application a draft Heritage, Townscape and Visual Impact Assessment (HTVIA) was provided (dated July 2020). It addressed the heritage assets impacted by the proposed scheme including Welwyn Garden City Conservation Area to the west of the site; the Grade II listed former Roche office building (list entry no: 1348142) to the east of the site; the Grade II listed former Shredded Wheat factory (list entry no: 1101084) to the north east of the site; and the Grade I listed Hatfield House and its associated parkland (Hatfield Park Registered Park and Garden, registered at Grade I) which also includes the Old Palace (Grade I listed) and, immediately to the west of Hatfield Park, St Etheldreda's Church (Grade I listed) which are located approximately 4km to the south of the site.

In this pre-application you have provided a Heritage Strategy undertaken by Bidwells, including comments received from Historic England (HE). Similar comments were raised by HE, these include but are not exclusive, the need for further assessment on the impact of the development upon Hatfield House and the Registered Parks and Gardens. In addition to this, HE also requested for CGI views in winter months when vegetation is sparse. The Heritage Strategy provided implies HE comments will be adequately addressed, which is strongly advised to avoid an objection due to a lack of analysis.

Within this pre-application a Heritage Strategy Note has confirmed that verified views will be commissioned for views 4 and 5 within the HTVIA (views from within the WGC Conservation Area) and that additional assessment will be provided in regards to the impact of the proposal on views from Hatfield House and Park. This assessment will be written rather than providing verified views and reference will be made to the verified views of the approved scheme on the Shredded Wheat site to the north of the Biopark site. This approach is considered adequate to understand and assess the impact of the proposal on the Welwyn Garden City Conservation Area and Hatfield House and Park.

As noted previously, some of the CGI views in the draft HTVIA show the development blocked by trees (shown as solid features) but this does not account for winter views or glimpsed views through foliage. As previously mentioned, subject to improved CGI views to account for filtered views through trees the revised maximum height of the proposed scheme has addressed some of the previous concerns regarding heritage assets. In addition to this, you were advised to still consider the impact on viewpoints at Hatfield House and Park fully. You should ensure the above information is provided on submission of any formal application.

Density

Within Broadwater Road West SPD, this site was not considered to be developed in a residential use. Having said that, the SPD includes a chapter regarding density, which states that development should be at an average density of 75dph across the site.

In this instance the site covers an area of approximately 1.22 hectares and the proposed development is for 289 residential units. The development would therefore exceed the average 75 dwellings per hectare figure specified in the SPD. Within the SPD it expands further on density and expresses that there are a number of factors influencing the optimum density for the site, for example, the factory silos should remain as a landmark feature with no competing development in the local context, building heights being reduced towards the southern end of the site and views should be maintained to the silos through the site from the railway line. Given the sustainable location of the site, higher density development is acceptable in principle in this location, subject to satisfying design policies and the SPD.

Urban Design

In terms of design, policies D1 to D12 of the District Plan seek to ensure the highest quality of design is proposed in all new developments. In the eLP Policy SP 9 sets out the strategic framework, supported by SADM 11 and SADM 12, for pursuing design aims. The Supplementary Design Guidance elaborates further on the design and layout of all new development. In addition to the design policies and guidance, the SPD outlines the Council's vision for the future of Broadwater Road West. Within the SPD it includes the vision for the design of the site, this includes, but not exclusive, discussion on character, layout, height, legibility and quality of the public realm.

On review of the information submitted, the site layout has been positively amended, with an increased stepping back to the sites southern edge which provides better separation between the proposals and the existing site edges and buildings. Other 'back of house' elements such as refuse collection and servicing are well located to avoid being prominent in the street scene. Amendments have also been made to the location of the proposed car club spaces to the frontage of the development which allows this facility to be easily accessible and clearly visible to residents and visitors.

A point of concern previously raised was the proximity of the townhouses to the existing block of flats to the east of the site. You have since submitted a study showing separation distances as well as proving that there are no habitable rooms directly looking towards each other. As such, I have no objection on this ground.

Turning to massing and height, you are still proposing a maximum of 9 storeys. As I mentioned in my previous pre-application response, the maximum height of 9 storeys is considered to be too tall. Consideration needs to be given towards the guidance in the Broadwater Road West SPD (2008), which requires building heights to decrease towards the south of the Shredded Wheat site to respect the scale of the listed Roche building, the landmark qualities of the silos and the residential buildings to the south.

From the information submitted you have demonstrated that the maximum height of the development is now less than the existing BioPark building (including flues). The tallest element, 9 storeys, is however located where existing development is lower in height. I am aware you intend to pursue an application with 9 storeys, there is likely to be concern regarding height, and therefore the planning balance would most likely be applied in this instance. You should ensure you submit justification demonstrating that 9 storeys would not result in significant harm and that the benefits outweigh the harm that I have identified.

It is noted that whilst the flues are incidental on the skyline, they are not particularly attractive features, providing a heavy industrial aesthetic, and it is anticipated that the proposed buildings will contribute more positively to the skyline than the existing situation. I advise that on submission of a planning application you submit CGIs demonstrating how views of the existing building and proposed development differs. In addition to this, you should add commentary acknowledging the difference in height and mass of the existing built form and that proposed, and where it does comment that it

results in a lesser harm upon the character and appearance of Welwyn Garden City. Please ensure the CGIs shared include images from human perceived height.

Notwithstanding the above comments relating to 9 storeys, I am pleased to note that Block C has been reduced in height to 8 storeys as a result of previous pre-application discussions where this was raised as a point of contention and more generally blocks C & D are now much better in terms of their scale and proportion. The reduction in height here now allows for a much more obvious and comfortable transition in height from the north to the south of the site. This will enable the development to sit comfortably within the surrounding proposed context.

As for the design quality and materials proposed, it is understood that the elevational treatment has been refined following the last pre-application meeting. The white brick originally proposed has now been amended to a blended brick with darker tones which allows it to sit comfortably with the balcony materials, windows and doors as well as forming a softer transition where it abuts the predominant red brick. The proposed material palette overall is considered to be high quality and a positive response to the traditional materials used in Welwyn Garden City. The proposed treatment to the contemporary reflection on mansard roofs (as a dominant architectural feature in the Garden City) are also positive, well-articulated and will offer something unique to the town and a high level of design aspiration and intent for future developments in the area. The detailed studies showing how the projecting balconies and bays will work, shows a great degree of thought and consideration has been given to how these will appear, which is welcomed.

The design has been refined to reflect architectural elements of the Garden City, including tile-hung mansard style roofs. References have also been made to the Grade II listed former Roche office building. The design changes are positive and give the development a character which will contribute to the emerging townscape in this part of the Garden City. The quality of the materials and the finish are important. Based on the material images in the revised design document, it is recommended that the tiles for the mansard roofs are clay, handmade/hand-finished tiles with a double camber. The quality of all external materials should be given equal consideration.

For this reason, the proposed terracotta tiles for the mansard roofs should be textured/riven as opposed to smooth as this will assist in 'softening' the roofs whilst also being in-keeping with the existing mansard roof materiality. I would request the materials are conditioned for this application and that sample wall panels of proposed bricks and fixtures are constructed for agreement.

Regarding the elevations, I have two outstanding points to raise which I would appreciate being taken into consideration and options presented for how they can be enhanced.

Firstly, I welcome the balcony strategy which I believe works well to provide variety and adding interest to elevations, however have concern regarding the extents of the projecting bay balconies which start at the first floor. There have been instances in the past where Secure By Design Officers have raised objection to balconies being placed at first floor due to the ease in which somebody could climb into them from ground floor. I would therefore suggest that the applicant engages with the SBD Officer to run through the scheme and gain their approval of this arrangement.

Secondly, I have concern that whilst the entrances have indeed been enhanced from previous iterations, more is still needed to be done to celebrate the entrances and make them more obvious in the public realm. At present when viewing some of the visuals (eg. Page 16 of the revised design document) the entrances appear lost and illegible. I would also ask whether there is the opportunity to theme the entrances or blocks in accordance with the sites existing use – potentially science / scientist focused or a connection to work which was undertaken at the BioPark historically. It would be positive to see an entrance study which takes these points on board.

Block E has been amended to continue the mansard theme, and this has become an interesting building which partly because it blends the white blended brick with the red, references the art-deco

style of the Roche Building and due to its scale actually appears similar to many of the Garden City original buildings when viewed from certain perspectives. This building helps to form a transition towards the taller mansard buildings by bringing this unique design detail down towards a more pedestrian level.

I welcome the proposed asymmetrical roofs of the townhouses which have been amended following the previous iteration of the design. The example provided of Du Jardin Mews in Ponders End is a positive precedent for the look and feel we would want to achieve for these townhouses.

At the meeting a discussion was had regarding rainwater goods and how these will be integrated into the elevations, eg will they be hidden from view or act as architectural elements in their own right. From the meeting it is understood that the proposal is for the latter, and therefore you should demonstrate how they have been applied to the elevations and contribute to the design as opposed to detracting.

To conclude on the urban design matters above, concern remains regarding the maximum height of 9 storeys and how it would ensure the design principles of the Broadwater Road West SPD are followed. You should demonstrate through the use of CGIs how the development would sit within the wider strategic site and compares to the existing building on site. In addition to this, further consideration is required towards the entrances, rainwater goods and balcony strategy. Subject to satisfying concerns relating to the adverse impact of height, albeit providing sufficient justification, there are many positive elements and it is clear that the architect is well versed in how to treat a contemporary design approach to taller buildings.

Amenity and Internal Layout

Policy SADM 11 requires all proposals to create and protect a good standard of amenity of buildings and external open space in line with the Council's Supplementary Design Guidance.

In regards to the internal space it is understood that the proposed residential units would satisfy Nationally Described Space Standard, which is supported. As for the shared circulation spaces and routes to private entrances these appear of a sufficient width. These spaces should be designed to be welcoming and naturally lit wherever possible. For clarification you should annotate the size of each residential unit on the floor plans.

A Technical Note on Daylight and Sunlight has been undertaken by Antsey Horne. This includes an assessment of the potential changes to daylight and sunlight levels in the neighbouring properties. It also includes an assessment of the daylight and sunlight levels likely to be achieved in the proposed units and amenity spaces.

The findings showed that the vast majority of the neighbouring windows and rooms satisfy the guideline values. Due to the massing of the building form being set back from existing residential properties the report demonstrates an increase in daylight and/or sunlight. Notwithstanding this, 2% of existing properties will not meet the guideline values for daylight and sunlight, however when considering the vertical sky component and daylight distribution guidelines in parallel, on 83-99 Broadwater Crescent would not meet the BRE guidelines.

The report states that the majority of the windows/rooms on these property retain greater than 0.71 times former value, which is only slightly below the BRE's guideline of retaining 0.8 times former value. Through the use of design, where possible you should seek to reduce the adverse impact upon the existing residential units.

In terms of the assessment for the proposed development, you expressed at the meeting that the sample of rooms tested were on the lower floors. The findings revealed that 17% of rooms tested did not meet the daylight guideline and 15%, when including south facing units, would not meet the

sunlight guidelines values. Antsey infer this is due to projecting or inset balconies. It would be useful if you indicated on a future plan the units which would be below the standard guideline value and provide commentary if this is due to inset or projecting balconies. Further consideration should then be given to the layout, design or siting of windows, to increase the amount of daylight and sunlight for a kitchen and bedroom. You therefore need to undertake further work to ensure efficiency of the proposed floorspace layouts maximise the daylight and sunlight levels within the proposed units to an adequate level set out within the BRE guideline where possible.

As for sunlight and daylight availability for the amenity spaces, it is noted the podium levels will all exceed the BRE's guideline values, which is supported. As for the ground floor amenity space, 86% of the space will receive 2 hours of sunlight on 21 March. I acknowledge when the ground floor amenity space is refined the percentage is likely to increase. As the BRE guidelines recommends that 2 hours of sunlight is received to at least 50% of a space, the development is considered to provide adequate natural light to the amenity spaces.

As for the external private space, this is important to create homes that meet people's needs and support appropriate living conditions. External private spaces should be proportionate to the size of the dwelling and the expected makeup of the household that are likely to occupy it. External private space should enable occupants to enjoy their home, allowing space for play and socialising and catering for domestic needs, such as storage of refuse, clothes drying and storage bicycles and other items typically too large to be comfortably stored within the dwelling.

In line with the Broadwater Road West SPD, the proposed development includes private outdoor space for each residential unit through the provision of private balconies. You should ensure that they are of a usable dimension to allow for setting out of a bistro style table and chairs comfortably to enable usability. To reflect this, it is recommended that where possible balconies are a minimum of 1.7m deep.

It is noted that the communal amenity provision at the site has increased in the region of a third in terms of total area beyond the previous iteration of the scheme. This has been primarily achieved through activating terrace spaces between blocks and on selected rooftops. This contributes significantly to the betterment of the scheme by allowing for a wider range of amenity spaces with different levels of provision for a variety of demographics living within the development. I am pleased to see that private ground floor amenity space has been defined within the latest set of plans. The private spaces should be created through the strong use of hedgerows acting as a boundary treatment which would assist with tying back into the Garden City original design principles.

Landscape

Landscape elements have an important aesthetic role in helping to define and reinforce the character of the area. The provision of well landscaped open space and planting is intrinsic to the character of Welwyn Garden City.

The consideration for movement through landscaped areas across the strategic site is positive and ties the site together through the use of landscaping. At the meeting I questioned whether it is possible to bring the line of trees at the edge of the central POS area nearer towards the highway to given an impression of a boulevard, as opposed to having the POS separated from the edge of the highway by a footpath which could be routed through the space instead. It is understood that this area may be required for loading and/or turning, however if this is not the case you should create a boulevard impression along the highway. This would resemble the character of the Garden City, whilst also deterring informal car parking in that locality.

I acknowledge that you intend to integrate climbers and hedgerows where possible to soften the entrance of the Biopark is supported. At the meeting I advised you consider introducing vertical climbers or a hedgerow along the shared boundary behind the over ground car parking area to soften

the car parking. You should also ensure any formal boundary is created through a hedgerow, albeit softened through vertical climbers.

In general, when considering the detail of the landscape planting consideration should be given to ensuring the scheme has resilience to drought, pests and diseases. The inclusion of a community lawn is supported. You should consider the use of medium canopy trees in this area to offer shade for those wanting to sit out in the grass in summer. The planting of a broad variety of species is encouraged. In addition to this, you should ensure all trees are located at an appropriate distance from the building line to accommodate for growth and long term viability.

As for hard landscaping, this should be limited and where possible you should seek to introduce it in a manner that is interesting and innovative.

The introduction of a SUDS basin into the development is welcomed and this will contribute towards providing a range of naturalised environments within the various areas of POS as well as helping to manage run off. You should submit detail on where run off into the SUDS is taken from, as well as design studies to show how the basin could be used as a multi-functional space should it be a predominantly dry basin with the exception of during periods of heavy rainfall. Alternatively, if it is to hold standing water, you should seek to activate the edges with opportunities for residents to engage with the waters edge. You should therefore investigate how the SUDS basin can become a positive active feature within the site.

The introduction of orchards and edible landscapes which weave their way through the development is also welcomed. This will also help contribute towards the health and wellbeing of residents. At the meeting, Place Services Urban Design Officer, suggested that the development includes a Health and Wellbeing Statement either as a standalone document or within the DAS which outlines how the development and its provision of amenity contributes towards an enhanced level of wellbeing for future residents. In addition to this, I advise you highlight within the DAS how orchards and edible landscapes, combines the best of town and country to create healthy communities, and including opportunities to grow food relating back to a principle of the original Garden City.

Housing Mix and Tenure

Policy SP 7 of the emerging LP states in order to deliver a choice of homes and help create sustainable, inclusive and mixed communities, provision should be made for a range of housing to support the needs and requirements of different households. In terms of housing mix, proposals for 11 or more new dwellings should demonstrate how the mix of tenure, type and size of housing proposed on sites will reflect the council's latest evidence of housing need and market demand and contribute towards meeting the varied needs of different households including single person households, couples, families with children, older people, people with disabilities and people wishing to build their own homes. For larger sites, there should be a greater opportunity to deliver a broader mix.

The most up to date evidence is found in the Technical OAN paper (June 2019) which has been produced in connection with the Local Plan examination. This paper sets out that the implied type of housing required (2013 – 2032) is 77% houses and 23% flats and the Council has the following housing need:

	1 bed	2 beds	3 beds	4 beds	4+ beds
Council's Housing Need	11%	26%	30%	14%	20%

The proposed housing mix has changed since the initial discussion. The proposed housing mix comprises of 134 x 1-bed (46%); 125 x 2-bed (43%); 22 x 3-bed (8%); and 8 x 4-bed (3%). Following

amendments to height and design of the buildings, the housing mix has reduced the number of 3 beds and increased 1 and 2 beds, whilst retaining 4 beds. Identified through the Local Plan examination there is a greater need for 2, 3 and 4 bed units, so the retention of 4 bed units is supported. As discussed at the meeting, you will need to provide justification to why more 1 and 2 beds are proposed, then 3 beds.

In regards to the housing tenure, you should ensure Policy H7 of the District Plan requires a minimum of 30% subsidised housing to be provided. Policy SP 7 of the emerging Local Plan echoes this. Policy SP17 (Mixed Use Development Site at Broadwater Road West) of the eLP also seeks a wide mix of housing types, sizes and tenures, including a minimum of 30% of units as affordable housing within the Opportunity Area. As part of the overall housing target, a proportion of new homes built in the borough will be for affordable housing. Subject to viability, you should ensure 30% (89 units) affordable housing provision is provided. Without social housing you will need to provide a robust justification and will likely be required to provide viability information to demonstrate that the scheme is not viable with the contribution of social housing.

Policy H10 (Accessible Housing) of the District Plan requires developments involving 5 or more dwellings to secure a proportion of dwellings to be built to lifetime homes standard. Policy SP 7 of the eLP states at least 20% of all new dwellings on sites involving 5 or more new dwellings to meet Building Regulations Part M4(2) standards for 'accessible and adaptable dwellings' the delivery of which should be distributed across market and affordable tenures. It is considered that this proportion may vary where a proportion of dwellings are proposed to meet Part M4(3) standards for 'wheelchair user dwellings'. This development proposes 11% M4(3) wheelchair user dwellings and the remainder to meet M4(2) standards for accessible and adaptable dwellings, exceeding the requirements of Policy SP 7 of the eLP, which is supported.

Highway, Access and Car Parking

Firstly, in terms of planning policy, paragraph 105 of the National Planning Policy Framework (NPPF) states that if setting local parking standards authorities should take into account the accessibility of the development, the type, mix and use of the development, availability of public transport, local car ownership levels and the overall need to reduce the use of high emission vehicles. Policy M14 of the District Plan 2005 and the Parking Standards Supplementary Planning Guidance (SPG) use maximum standards and are not consistent with the NPPF and are therefore afforded less weight.

In light of the above, the Council have produced an interim Policy for Car Parking Standards that states that parking provision will be assessed on a case by case basis and the existing maximum parking standards within the SPG should be taken as guidance only. This means that higher or lower car parking standards than those set out in the SPG can be proposed and determined on a case by case basis taking into account the relevant circumstances of the proposal, its size context and its wider surroundings. Furthermore, as I mentioned in the Design Workshop meeting, within the SPG it states a reduction has already been application to residential units through the zonal approach and therefore no further reduction is applied. The onus is on you to demonstrate through transport information submitted alongside their planning applications that a greater or lesser level of car parking provision is appropriate.

As I mentioned in the previous pre-application the SPG requirements are 0.75 per 1 bed dwelling, 1 space per 2 bed dwelling, 1.5 spaces per 3 bed dwelling, 2 spaces per 4 bed dwelling and 1 long term cycling space per unit (if no storage provided). It has come to my attention that, Block F and the townhouses would fall within Zone 3, whereby the SPG requirements are 1.5 for a 2 bed dwelling, 2.25 for a 3 bed dwelling and 3 spaces for a 4 bed dwelling.

In this instance, the housing mix is 134 x 1-bed; 125 x 2-bed; 22 x 3-bed; and 8 x 4-bed, and the commercial element is 82.6sqm. As a result, the maximum car parking provision should be 425 to 427, subject to sufficient justification being provided.

Since our previous pre-application it is positive to note that you have increase the car parking ratio to 188 parking spaces, including 27 blue badge bays; 19 visitor spaces and 6 community hub spaces. In addition to this you are proposing 1 car club bay, 6 motorcycle spaces, electric vehicle charging points and 291 cycle parking spaces (1 per unit and 2 for the community hub). Disregarding the car club, the car parking provision equates to a ratio of 0.65 spaces per unit.

The reason I have disregarded the car club in this calculation is there is some discrepancy regarding the number of car parking spaces a car club would be equivalent. Within i-transport comments at paragraph 4.1.5 it calculates that the provision of a car club (supported by membership offers for future residents) is the equivalent of increasing car parking provision by an additional 10-11 spaces on site. Within the Shredded Wheat Development it was concluded that a car club would equate to the equivalent of 6 car parking spaces on site. The latter was accepted within the Shredded Wheat extant permission. You therefore need to provide justification and evidence demonstrating that the car club would result in an equivalent of 10-11 spaces because at this point it is likely to be disputed. I have also done further research regarding car parking provision approved under the extant permission at the Shredded Wheat site and note the following; across the consented scheme a car parking ratio was approved of 0.7 spaces.

Arguably car parking on the south side is more relevant for your scheme given the close proximity to the site and also as it was approved for residential use. Under the extant permission a total of 472 car parking spaces were approved, resulting in a ratio of 0.73 spaces per dwelling on the South Side, when including visitor spaces and car clubs. However, when disregarding visitor and car club spaces, residential permit spaces equated to 0.57 spaces per unit. I am aware that the residential parking on your site would equate to 0.56 spaces per unit and is therefore of a similar ratio. For this reason I encourage you to refer to the consented Shredded Wheat scheme on this matter.

I note you have also integrated blue badge parking and electrical vehicle parking, which are both supported.

I appreciate the Transport Note is a summary regarding highways and transport work undertaken so far, but on submission of a planning application you should consider whether there is capacity on existing transport infrastructure, particularly the train line and bus services and how residents will travel east to west. These matters need to be addressed and submitted as part of the justification for car parking, to prevent an objection being raised.

In terms of the location of car parking, it is considered that the scheme would be unlikely to result in a car dominant scheme. Furthermore, the location of the car club is appropriate as it is easily accessible for people to use and is a positive aspect of this scheme, which is supported. You should submit the car parking plan with the full planning application. You should also submit a car parking management strategy and explain how you plan on allocating car parking.

In addition to car parking, I note you are proposing one long term cycle parking space for each flat and 2 for the community hub. The location of the cycling stores are considered acceptable and easily accessible for residents of the site. Details of the level of cycling spaces must be provided. Given that you are providing less car parking provision and emphasising the sustainability of the site, I strongly advise you consider introducing some cycle parking for visitors. You will need to ensure the cycle storage is secure.

As noted previously, the Council has agreed to treat its existing car parking standards as guidelines rather than maximums. This means that higher or lower car parking standards than those set out in the SPG can be proposed (by landowners, developers, etc) and determined (by officers and elected councillors) on a case-by-case basis taking account of the relevant circumstances of the proposal, its size context and its wider surroundings, as well as the NPPF guidance set out above. The onus

is therefore on you to demonstrate through transport information submitted alongside their planning applications that a greater or lesser level of car parking provision is appropriate.

As discussed at the meeting I advise you address any concerns raised from your pre-application meeting with the Highways Authority.

To conclude on the above, the proposed car parking provision is a lower standard than the SPG car parking requirement. As discussed at the meeting I have concern with the lack of justification for the standard of car parking proposed. Therefore, whilst you have increased the number of car parking spaces, I remain of the view that you need to provide robust justification regarding the lack of car parking. You should also demonstrate whether there is capacity on existing transport infrastructure, particularly the train line and bus services and how residents will travel east to west. You should therefore provide robust justification and address the above points relating to car parking so that we can give a recommendation of support.

Biodiversity

The site is not covered by any statutory or non-statutory designated ecological sites. The Sherradspark Wood Local Nature Reserve is located North-West of the Site. The Site lies within an area defined by the Environment Agency as Flood Zone 1 (<0.1% risk of flooding in any one year).

You should consider the impacts of the proposed development on any local wildlife or geodiversity sites, in line with paragraphs 171 and 174 of the NPPF and any relevant development plan policy. There may also be opportunities to enhance local sites and improve their connectivity.

You should also be aware that the government are intending to introduce an Environment Bill, which would result in a new duty for developers to deliver 10% net biodiversity gain in new schemes. This strengthens the current requirement in the Framework, that planning policies and decisions "should" enhance the environment by "minimising impacts on and providing net gains for biodiversity".

The application site is currently dominated with industrial buildings and hardstanding. The proposed development seeks to introduce soft landscaping and green roofs, so is likely to result in a net biodiversity gain, which if the case, would be supported. You should ensure a preliminary ecological survey is undertaken and mitigation measures proposed where necessary. You should consider the inclusion of bird boxes, hedgehog highways via gaps in fences and encourage SuDs double as wildlife habitats.

Sustainability

Policy SADM 13 of the eLP states that all major development proposals must demonstrate that they have sought to maximise opportunities for renewable and low carbon sources of energy supply where consistent with other Local Plan policies. Furthermore, all newly constructed dwellings will be required to achieve an estimated water consumption of no more than 110 litres/person/day, with water reuse and recycling and rainwater harvesting incorporated wherever feasible to reduce demand on mains water supply. You are therefore required to submit a Sustainable Design Statement

I note you intend to integrate energy and sustainability strategies prepared to reflect national energy standards and will strive to go beyond these standards wherever feasible. At this stage, with the exception of sustainable travel, information has not been provided demonstrating how you intend to incorporate sustainable features. You should consider the selection of materials and construction techniques, follow the energy hierarchy and maximise resilience as suggested within the National Design Guidance. I also suggest you aim to go above and beyond the standard level of sustainable development, as this would be a positive aspect of the proposal contributing towards the planning balance when determining the application.

Environmental Statement

As you are aware, we have recently issued a positive EIA Screening Opinion to you on the 18th November 2020. It concluded that the LPA considered the development to be EIA development and advised that you subsequently request a Scoping Opinion.

Phasing

On submission of a formal application I strongly urge you to provide a phasing plan, including the housing trajectory and when you anticipate when development shall commence clearly demonstrating that the delivery of these houses will contribute towards the council's 5 year housing land supply. The Framework encourages the LPA to consider imposing a shorter time period, potentially 1-2 years, when development shall commence to ensure that proposals for housing development are implemented in a timely manner.

Fire Strategy

In my initial pre-application I commented that you will need to submit a Fire Statement with a formal application. Within the Planning Statement you have confirmed that the requirement of a Fire Statement is noted. I therefore trust you intend to submit a Fire Statement with the application.

Planning Obligations

In accordance with Policy IM2 of the District Plan, to satisfy the sustainability aims of the Plan and secure the proper planning of the area, development will be required to provide for the infrastructure, services and facilities which are directly related to it and necessary to the granting of planning permission.

The Planning Obligations Supplementary Planning Document (Feb 2012) provides detailed guidance on the type and scale of planning obligations that may be sought. Having regard to the size of the site and scale and nature of the development proposed, obligations may be sought for affordable housing, green space, allotments, play facilities, outdoor and indoor sports facilities, community facilities, waste and recycling mitigate the impact of the proposed development, amongst other services.

A separate email has been shared with you on the 2nd November 2020 outlining HCC's Growth & Infrastructure Unit response to the proposed development in respect of planning obligations sought towards education, childcare, library and youth services to minimise the impact of development on Hertfordshire County Council Services for the local community. As their response is to a pre-application consultation and the development mix and trajectory may change at the point that a planning application is submitted, a further assessment of requirements may need to be undertaken and revised levels of financial contributions provided when a planning application is submitted. Their response is provided on a without prejudice basis as more updated information may be in use at the point the planning application is submitted.

Please note that the Local Planning Authority are currently in public consultation on charges for new Community Infrastructure Levy. The eight-week consultation runs from 30 September to 25 November. Information regarding CIL and the proposed Draft Charging Schedule Consultation can be found at www.welhat.gov.uk/CIL. I bring this to your attention as the local authority are likely to adopt CIL in the forthcoming year, and this would have an implication upon the set planning charge which would be sought from new development towards the delivery of necessary supporting infrastructure. When the Local Planning Authority adopt CIL any pending application where a decision has not been determined will have CIL applied, regardless if a draft S106 planning obligation is currently underway.

Conclusion

To conclude on the above, concern still remains that the maximum height of 9 storeys fails to respect and relate to the character and context of the residential properties surrounding the site and would be contrary to the design principles of Broadwater Road West SPD. You need to demonstrate how the proposal complements development within the wider strategic site and that the proposal adheres to design principles identified within the SPD for the strategic site. Prior to submission of any future planning application I advise you outline how this has been achieved and provide CGIs, plans and/or elevations demonstrating this. I encourage you pay particular attention in emphasising the difference in height of the existing building on site and the proposed development and the harm or benefits the proposed development presents upon the character and appearance of the Garden City.

In addition to the above, you should also ensure sufficient robust justification is provided regarding car parking provision. I advise you address the points of concern raised within the meeting and outlined further within this letter.

As I mentioned at the meeting it is recognised that the Local Planning Authority does not have a five year housing land supply, so the planning balance would be undertaken in favour of sustainable development. As discussed at the meeting you will need to submit justification demonstrating that the public benefits presented by this development outweighs any harm, namely the concern regarding the height of the development.

As you are aware, pre-application advice has not been included in this response from Hertfordshire County Council, Transport Programmes and Strategy, Environment Agency or the Lead Local Flood Authority as they each provide their own pre-application advice service, subject to a fee.

Please note, that this letter should be read in conjunction with the pre-application response dated 1st July and 10th September. Any matters of concern within the letters should be addressed to ensure the scheme is not objected to.

This advice represents my personal professional opinion and is given without prejudice to the decision of the Local Planning Authority in respect of this enquiry or any future application which may be submitted. Please note that there may be other issues which come to light when a planning application is submitted and consultations carried out.

Should you have any questions, please contact me.

Yours sincerely,

Ms Clare Howe

Principal Major Development Management Officer

Appendix 5 - Accommodation Schedule

Level	Dwelling Plot Number	Type	Dwelling Counter	Dwelling Total Area	Dwelling Amenity Area
L00	A001	1B2P WCH	1	65.0 m ²	32.6 m ²
L00	A002	2B3P	1	71.1 m ²	29.9 m ²
L00	A003	2B4P	1	71.8 m ²	98.9 m ²
L00	A004	2B4P	1	74.8 m ²	56.7 m ²
L00	A005	3B4P	1	77.2 m ²	90.2 m ²
L00	A006	1B2P	1	57.8 m ²	10.7 m ²
L00	A007	3B5P	1	90.1 m ²	27.2 m ²
L00	A008	2B4P	1	80.0 m ²	42.7 m ²
L00	B001	2B3P	1	66.2 m ²	25.2 m ²
L00	B002	2B4P	1	70.0 m ²	31.9 m ²
L00	B003	1B2P	1	50.1 m ²	12.4 m ²
L00	B004	2B3P	1	64.4 m ²	52.6 m ²
L00	B005	1B2P WCH	1	66.4 m ²	16.2 m ²
L00	B006	2B4P	1	78.4 m ²	43.1 m ²

L01	A101	1B2P WCH	1	65.0 m ²	6.6 m ²
L01	A102	2B3P	1	71.1 m ²	6.6 m ²
L01	A103	2B4P	1	71.8 m ²	7.3 m ²
L01	A104	2B4P	1	74.8 m ²	7.2 m ²
L01	A105	3B4P	1	77.2 m ²	10.4 m ²
L01	A106	1B2P	1	57.8 m ²	5.1 m ²
L01	A107	3B5P	1	90.3 m ²	8.7 m ²
L01	A108	1B2P	1	57.4 m ²	5.1 m ²
L01	A109	1B2P	1	51.8 m ²	5.7 m ²
L01	A110	2B4P	1	76.7 m ²	7.5 m ²
L01	B101	3B4P	1	78.2 m ²	14.5 m ²
L01	B102	2B4P	1	70.0 m ²	7.8 m ²
L01	B103	0B1P STUDIO	1	37.2 m ²	5.8 m ²
L01	B104	1B2P	1	50.6 m ²	5.8 m ²
L01	B105	1B2P	1	50.4 m ²	5.8 m ²
L01	B106	2B3P	1	64.1 m ²	6.6 m ²
L01	B107	1B2P WCH	1	66.4 m ²	6.6 m ²
L01	B108	1B2P	1	51.8 m ²	5.7 m ²
L01	B109	2B4P	1	76.7 m ²	7.5 m ²

L02	A201	1B2P WCH	1	65.0 m ²	6.6 m ²
L02	A202	2B3P	1	71.1 m ²	6.6 m ²
L02	A203	2B4P	1	71.8 m ²	7.2 m ²
L02	A204	2B4P	1	74.8 m ²	7.2 m ²
L02	A205	3B4P	1	77.2 m ²	10.4 m ²
L02	A206	1B2P	1	57.8 m ²	5.1 m ²
L02	A207	3B5P	1	90.1 m ²	8.7 m ²
L02	A208	1B2P	1	57.4 m ²	6.5 m ²
L02	A209	1B2P	1	51.8 m ²	5.7 m ²
L02	A210	2B4P	1	76.7 m ²	7.5 m ²
L02	B201	3B4P	1	78.2 m ²	14.5 m ²
L02	B202	2B4P	1	70.0 m ²	8.0 m ²
L02	B203	0B1P STUDIO	1	37.2 m ²	5.8 m ²
L02	B204	1B2P	1	50.6 m ²	5.8 m ²
L02	B205	1B2P	1	50.4 m ²	5.8 m ²
L02	B206	2B3P	1	64.1 m ²	6.6 m ²
L02	B207	1B2P WCH	1	66.4 m ²	6.6 m ²
L02	B208	1B2P	1	51.8 m ²	5.7 m ²
L02	B209	2B4P	1	76.7 m ²	7.5 m ²

L03	A301	1B2P WCH	1	65.0 m ²	6.6 m ²
L03	A302	2B3P	1	71.1 m ²	6.6 m ²
L03	A303	2B4P	1	71.8 m ²	7.2 m ²
L03	A304	2B4P	1	74.8 m ²	7.2 m ²
L03	A305	3B4P	1	77.2 m ²	10.4 m ²
L03	A306	1B2P	1	57.8 m ²	5.1 m ²
L03	A307	3B5P	1	90.1 m ²	8.7 m ²
L03	A308	1B2P	1	57.4 m ²	6.5 m ²
L03	A309	1B2P	1	51.8 m ²	5.7 m ²
L03	A310	2B4P	1	76.7 m ²	7.5 m ²
L03	B301	3B4P	1	78.2 m ²	14.4 m ²
L03	B302	2B4P	1	70.0 m ²	8.0 m ²
L03	B303	0B1P STUDIO	1	37.2 m ²	5.8 m ²
L03	B304	1B2P	1	50.6 m ²	5.8 m ²
L03	B305	1B2P	1	50.4 m ²	5.8 m ²
L03	B306	2B3P	1	64.1 m ²	6.6 m ²
L03	B307	1B2P WCH	1	66.4 m ²	6.6 m ²
L03	B308	1B2P	1	51.8 m ²	5.7 m ²
L03	B309	2B4P	1	76.7 m ²	7.5 m ²

L04	A401	1B2P WCH	1	65.0 m ²	6.6 m ²
L04	A402	2B3P	1	71.1 m ²	6.6 m ²
L04	A403	2B4P	1	71.8 m ²	7.2 m ²
L04	A404	2B4P	1	74.8 m ²	7.2 m ²
L04	A405	3B4P	1	77.2 m ²	10.4 m ²
L04	A406	1B2P	1	57.8 m ²	5.1 m ²
L04	A407	3B5P	1	90.1 m ²	8.7 m ²
L04	A408	1B2P	1	57.4 m ²	6.5 m ²
L04	A409	1B2P	1	51.8 m ²	5.7 m ²
L04	A410	2B4P	1	76.7 m ²	7.5 m ²
L04	B401	3B4P	1	78.2 m ²	14.2 m ²
L04	B402	2B4P	1	70.0 m ²	8.0 m ²
L04	B403	0B1P STUDIO	1	37.2 m ²	5.8 m ²
L04	B404	1B2P	1	50.6 m ²	5.8 m ²
L04	B405	1B2P	1	50.4 m ²	5.8 m ²
L04	B406	2B3P	1	64.1 m ²	6.3 m ²
L04	B407	1B2P WCH	1	66.4 m ²	6.6 m ²
L04	B408	1B2P	1	51.8 m ²	5.7 m ²
L04	B409	2B4P	1	76.7 m ²	7.5 m ²

L05	A501	1B2P WCH	1	65.0 m ²	6.7 m ²
L05	A502	2B3P	1	71.1 m ²	6.6 m ²
L05	A503	2B4P	1	71.8 m ²	7.2 m ²
L05	A504	2B4P	1	74.8 m ²	7.2 m ²
L05	A505	3B4P	1	77.2 m ²	10.4 m ²
L05	A506	1B2P	1	57.8 m ²	5.1 m ²
L05	A507	3B5P	1	90.1 m ²	8.7 m ²
L05	A508	1B2P	1	57.4 m ²	6.5 m ²

L05	A509	1B2P	1	51.8 m ²	5.7 m ²
L05	A510	2B4P	1	76.7 m ²	7.5 m ²
L05	B501	3B4P	1	78.2 m ²	14.2 m ²
L05	B502	2B4P	1	70.0 m ²	8.0 m ²
L05	B503	0B1P STUDIO	1	37.2 m ²	5.8 m ²
L05	B504	1B2P	1	50.6 m ²	5.8 m ²
L05	B505	1B2P	1	50.4 m ²	5.8 m ²
L05	B506	2B3P	1	64.1 m ²	6.3 m ²
L05	B507	1B2P WCH	1	66.4 m ²	6.6 m ²
L05	B508	1B2P	1	51.8 m ²	5.7 m ²
L05	B509	2B4P	1	76.4 m ²	7.5 m ²

L06	A601	1B2P WCH	1	65.1 m ²	6.3 m ²
L06	A602	2B3P	1	71.1 m ²	6.3 m ²
L06	A603	2B4P	1	71.8 m ²	7.2 m ²
L06	A604	2B4P	1	74.8 m ²	7.2 m ²
L06	A605	3B4P	1	77.2 m ²	10.4 m ²
L06	A606	1B2P	1	57.8 m ²	5.1 m ²
L06	A607	3B5P	1	90.1 m ²	8.7 m ²
L06	A608	1B2P	1	57.4 m ²	6.5 m ²
L06	B601	3B4P	1	78.3 m ²	14.4 m ²
L06	B602	2B4P	1	70.0 m ²	8.0 m ²
L06	B603	0B1P STUDIO	1	37.2 m ²	5.8 m ²
L06	B604	1B2P	1	50.6 m ²	5.8 m ²
L06	B605	1B2P	1	50.4 m ²	5.8 m ²
L06	B606	2B3P	1	64.2 m ²	6.5 m ²
L06	B607	1B2P WCH	1	66.4 m ²	6.6 m ²

L07	A701	1B2P	1	56.5 m ²	7.0 m ²
L07	A702	2B3P	1	63.8 m ²	37.3 m ²
L07	A703	0B1P STUDIO	1	37.4 m ²	24.9 m ²
L07	A704	2B3P	1	64.1 m ²	23.9 m ²
L07	A705	1B2P	1	56.1 m ²	6.4 m ²
L07	A706	1B2P	1	51.4 m ²	25.4 m ²
L07	A707	2B4P	1	72.0 m ²	25.6 m ²
L07	B701	1B2P	1	53.8 m ²	27.9 m ²
L07	B702	1B2P	1	50.4 m ²	50.5 m ²
L07	B703	1B2P	1	50.4 m ²	5.8 m ²
L07	B704	2B4P	1	74.1 m ²	18.6 m ²
L07	B705	2B3P	1	64.4 m ²	23.9 m ²

L08	A801	2B4P	1	78.1 m ²	7.3 m ²
L08	A802	2B3P	1	67.2 m ²	14.4 m ²
L08	A803	0B1P STUDIO	1	36.8 m ²	5.4 m ²
L08	A804	1B2P	1	50.6 m ²	5.4 m ²
L08	A805	1B2P	1	53.5 m ²	6.4 m ²
L08	A806	2B3P	1	64.5 m ²	10.4 m ²
L08	B801	3B4P	1	79.4 m ²	22.0 m ²
L08	B802	1B2P	1	53.0 m ²	5.3 m ²
L08	B803	2B3P	1	64.1 m ²	10.9 m ²
L08	B804	1B2P	1	54.1 m ²	5.6 m ²
Grand total			146		

Level	Dwelling Plot Number	Type	Dwelling Counter	Dwelling Total Area	Dwelling Amenity Area
L00	C001	1B2P	1	54.9 m ²	23.3 m ²
L00	C002	1B2P WCH	1	71.1 m ²	41.3 m ²
L00	C003	2B3P WCH	1	78.3 m ²	20.0 m ²
L00	C004	2B3P	1	65.8 m ²	27.5 m ²
L00	C005	2B3P	1	63.1 m ²	30.8 m ²
L00	C006	1B2P WCH	1	69.9 m ²	56.9 m ²
L00	D001	0B1P STUDIO	1	43.1 m ²	39.7 m ²
L00	D002	1B2P	1	52.0 m ²	23.9 m ²
L00	D003	1B2P WCH	1	74.1 m ²	101.1 m ²
L00	D004	1B2P	1	53.7 m ²	63.6 m ²
L00	D005	1B2P WCH	1	70.7 m ²	29.5 m ²
L00	D006	2B3P WCH	1	83.1 m ²	23.5 m ²

L01	C101	2B3P	1	64.4 m ²	7.0 m ²
L01	C102	2B4P	1	71.6 m ²	7.0 m ²
L01	C103	2B3P	1	61.6 m ²	13.7 m ²
L01	C104	2B3P	1	63.1 m ²	6.3 m ²
L01	C105	1B2P	1	51.2 m ²	5.3 m ²
L01	C106	2B4P	1	69.9 m ²	9.3 m ²
L01	C107	1B2P WCH	1	65.2 m ²	5.3 m ²
L01	C108	1B2P	1	50.3 m ²	5.3 m ²
L01	D101	1B2P W			

Appendix 6 - Lambert Smith Hampton Letter

15 December 2020

www.lsh.co.uk

FAO: Mark Quinn
Aldenham Residential
Rose Farm
Chiswell Green Lane
St Albans
AL2 3NR

Lambert Smith Hampton
United Kingdom House
180 Oxford Street
London
W1D 1NN

Dear Mark

Broadwater Gardens, Welwyn Garden City: Market Review

I have reviewed the local market, the demographics of the area and in summary I would recommend that a predominance of 1 & 2-bedroom apartments are required in this location. This will best meet the current demand levels and provide the accommodation required in the area.

1. Location and Demographics

The site sits to the east of the railway station in the Post Code District AL7. The site is in a highly accessible and sustainable location, in easy walking distance from the rail station and town centre and other public transport routes.

There are **14,180** households in the AL7 area, with a of population **33,954**, representing an average household size of **2.4** people.

The age profile in the area is reflective of a younger working age demographic. with **28.7%** of the population in their 20's and 30's, significantly higher than the **17.6%** seen at a national level.

Conversely, people over the age of 65 represent just **12.6%** of the local population compared to the higher national average of **18.5%**.

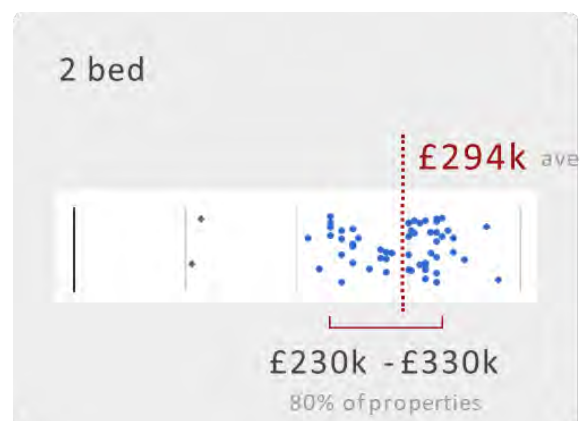
2. Affordability

According to the ONS, the average household income in the area is **£46,800**. If the household had no dependents or other credit commitments the average household would be able to borrow **£222,300** on mortgage, based on the Nationwide Building Society affordability calculator

The average household, with a 5% deposit saved and under the *Help to Buy* scheme, that will continue to run for First Time Buyers up to March 2023, would be able to purchase a home to the value of **£296,400**.

The most appropriate product in the area to meet this demand would be a 2-bedroom property, with the current price ranges for a 2-bedroom property placed within this attainable price range.

It is also noteworthy, that since launch, the Help to Buy scheme has been used by **390** buyers in the Welwyn & Hatfield Local Authority area, with apartments accounting for **64%** of the properties sold; a much higher proportion than is seen at a national level indicating strong demand for this product.



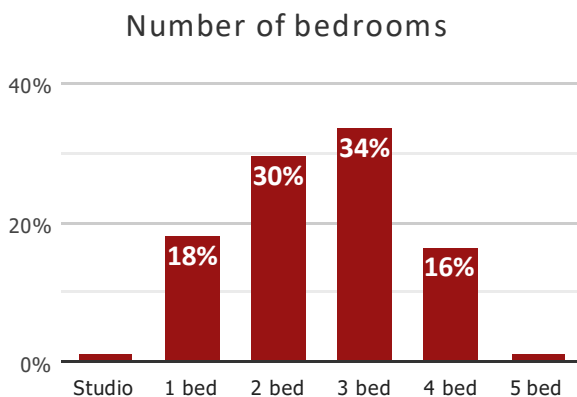
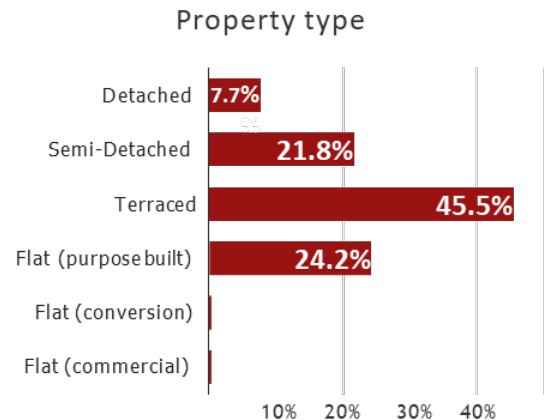
Dec-20: Current Asking Price ranges - Portals

3. Current Housing Stock

The dominant housing type in the area is terraced property, and it currently accounts for **45%** of the total housing stock.

The proportion of purpose-built apartments has increased in recent years, but still only accounts for **24%** of the total housing stock in the area.

I have reviewed the Land Registry data for transactions completing in the area between Dec-19 and Sept-20. **176** completions were identified, with **30** apartment sales recorded at an average price of **£208,883**. This represents just **17%** of all transactions, lower than the proportion of overall stock level, suggesting that supply of apartments in the area is constrained below current demand.



The terraced housing in the area also accounts for the majority of the 3-bedroom stock in this location, with 3-bedroom properties accounting for **34%** of the total housing stock.

The review of the Land Registry data (Dec-19-Sept-20) the sales of 3-bedroom stock in the area accounted for over 50% of the all transactions.

The sales of 2-bedroom property accounted for **22%** of the transactions in the period; once again lower than the proportion of overall 2-bedroom stock in the area.

In summary, based upon the demographic profile of the area being younger workers; average household size at 2.4; the average household income indicating a new homes purchase at around £300k is achievable, and a current under supply of 2-bedroom stock when compared to demand, indicates that a greater proportion of 1 and 2-bedroom apartments would be the most suitable stock. In closing it is a sustainable location close to the train station and town centre and this attracts a demographic suited to 1/2 bed flats.

Yours sincerely

Paul Walker
Director – London
Lambert Smith Hampton
Email: pwalker@lsh.co.uk



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