

Health and Wellbeing Statement **Broadwater Gardens**

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

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hghconsulting.com



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1.0 Introduction

1.1 This Health and Wellbeing Statement is submitted on behalf of HG Group (“the Applicant”) to accompany a planning application for the redevelopment of the BioPark site, Broadwater Road, Welwyn Garden City, AL7 3AX (“the site”).

1.2 The planning application is 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.”

1.3 The application site is shown in Figure 1 below.



Figure 1: Project Site Location

1.4 This Statement is structured as follows:

- **Section 2** summarises the relevant health and wellbeing planning policy context;
- **Section 3** outlines the development proposal;
- **Section 4** establishes baseline conditions with respect to the availability and capacity of local services close to the site;
- **Section 5** completes the NHS Healthy Urban Planning Checklist (2014) for the proposals;
- **Section 6** assesses the proposed development against the Garden City Principles for the 21st Century (Town and Country Planning Association, “TCPA”, 2020);



- **Section 7** draws conclusions with regard to the development's contribution to the health and wellbeing of future residents.

2.0 Policy Framework

- 2.1 It is widely recognised that built and natural environments are major influences in health and wellbeing. This connection is recognised in founding Garden City Principles and reflected in the TCPA's adaptation of these principles for application to modern developments. There are a number of current planning policies and documents which relate to health in planning and recognise the important contribution that planning can make to improving health and wellbeing.
- 2.2 At a national level, the National Planning Policy Framework ("NPPF") provides Government guidance on planning policy and is a material consideration in the determination of planning applications. The national policy background and its links to health and wellbeing are set out below.

National Planning Policy Framework

- 2.3 Chapter 8 of the NPPF (February 2019) seeks to promote healthy and safe communities by:
- a) *Promoting social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mixed-use developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;*
 - b) *Creating places that are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas; and*
 - c) *Enabling and supporting healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.*
- 2.4 Chapter 8 of the NPPF (February 2019) is underpinned by the three dimensions to sustainable development. Paragraph 8 sets out that:
- “Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):*
- a) *an economic objective – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*
 - b) *a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and*

c) an environmental objective – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.”

2.5 Further links to planning and health are found throughout the NPPF. Key areas include policies on transport (see NPPF chapter 9), high quality homes (see NPPF chapter 5), good design (see NPPF chapter 12), climate change (see NPPF chapter 14) and the natural environment (see NPPF chapter 15).

2.6 Further guidance is also contained in National Planning Practice Guidance (PPG). In relation to Health and Wellbeing, the advice in relation to how positive planning can contribute to healthier communities advises, inter alia, as follows:

“The design and use of the built and natural environments, including green infrastructure are major determinants of health and wellbeing. Planning and health need to be considered together in two ways: in terms of creating environments that support and encourage healthy lifestyles, and in terms of identifying and securing the facilities needed for primary, secondary and tertiary care, and the wider health and care system (taking into account the changing needs of the population).

Public health organisations, health service organisations, commissioners, providers, and local communities can use this guidance to help them work effectively with local planning authorities to promote healthy and inclusive communities and support appropriate health infrastructure.” (Paragraph: 001 Reference ID:53-001-20190722 Revision date: 22 07 2019)

2.7 The PPG defines a healthy place as:

“A healthy place is one which supports and promotes healthy behaviours and environments and a reduction in health inequalities for people of all ages. It will provide the community with opportunities to improve their physical and mental health, and support community engagement and wellbeing.

It is a place which is inclusive and promotes social interaction. The National Design Guide sets out further detail on promoting social interaction through inclusive design including guidance on tenure neutral design and spaces that can be shared by all residents.

It meets the needs of children and young people to grow and develop, as well as being adaptable to the needs of an increasingly elderly population and those with dementia and other sensory or mobility impairments.” (Paragraph: 003 Reference ID:53-003-20191101 Revision date: 01 11 2019)

Local Development Plan

2.8 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.

- 2.9 The development plan comprises the Welwyn Hatfield District Plan (2005) – Saved Policies (2008). Relevant local plan policies in relation to Health and Wellbeing are set out below.
- 2.10 Policy SD1- Sustainable Development set outs that:
- “Development proposals will be permitted where it can be demonstrated that the principles of sustainable development are satisfied and that they accord with the objectives and policies of this plan. To assist the Council in determining this, applicants will be expected to submit a statement with their planning application demonstrating how their proposals address the sustainability criteria in the checklist contained in the Supplementary Design Guidance.”*
- 2.11 Policy R11 – Biodiversity and Development sets out that:
- “All new development will be required to demonstrate how it would contribute positively to the biodiversity of the site by;*
- The retention and enhancement of the natural features of the site;*
- The promotion of natural areas and wildlife corridors where appropriate as part of the design;*
- The translocation of habitats where necessary, where it can be demonstrated that the habitat or species concerned cannot be successfully accommodated within the development;*
- The use of locally native species in planting in accordance with Policy D8 Landscaping;*
- Helping meet priorities/targets set out in the Local Biodiversity Action Plan.”*
- 2.12 Policy R18 – Air Quality sets out that:
- “The Council will have regard to the potential effects of a development on local air quality when determining planning applications. Consideration will be given to both the operational characteristics of the development and to the traffic generated by it. Any development within areas designated as Air Quality Management Areas must have regard to guidelines for ensuring air quality is maintained at acceptable levels as set out in the Air Quality Strategy.”*
- 2.13 Policy D1 – Quality of Design sets out that:
- “The Council will require the standard of design in all new development to be of a high quality. The design of new development should incorporate the design principles and policies in the Plan and the guidance contained in the Supplementary Design Guidance.”*
- 2.14 Policy D4 – Quality of the Public Realm sets out that:
- “The Council will expect new development where appropriate to either create or enhance public areas and the public realm.”*

2.15 Policy D7 – Safety by Design sets out that:

“The Council requires the design of new development to contribute to safer communities, to help with the reduction of the fear of crime.”

2.16 Policy D9 – Access and Design for People with Disabilities sets out that:

“All new development should be designed to allow access by the disabled, young children in prams and pushchairs and those who are temporarily disabled through accident or injury. This includes access required to the site and access within the buildings and open spaces on the site. The Council will continue to provide for the movement needs of people with mobility restrictions in existing and proposed public areas and will support the promotion of mobility initiatives wherever possible.”

2.17 Welwyn Hatfield Borough Council are producing a draft Local Plan which is currently undergoing Examination. The submission draft Local Plan was published in 2016.

Broadwater Road West Supplementary Planning Document (SPD)

2.18 In its preparation, the Broadwater Road West SPD was appraised against the following key objectives, a number of which contribute to seeking to improve health and wellbeing:

- Maintain the vitality and viability of existing centres;
- Protect and enhance biodiversity; Ensure a sustainable supply and use of energy;
- Move away from waste disposal to minimisation, reuse, recycling and recovery;
- Improve the choice of sustainable transport modes, encourage their use, and reduce the need to travel by car;
- Protect and provide green spaces;
- Protect landscape and townscape character;
- Maximise the opportunities for leisure and a healthy lifestyle; and
- Tackle the causes of social exclusion.

Garden City Principles

2.19 The TCPA’s Garden City principles are a distillation of the key elements that have made the traditional Garden City model of development so successful, articulated for a 21st century context. Taken together, the principles form an indivisible and interlocking framework for the delivery of high-quality places.

2.20 According to the TCPA, The Garden City principles consist of:

- Land value capture for the benefit of the community.
- Strong vision, leadership and community engagement.

- Community ownership of land and long-term stewardship of assets.
- Mixed-tenure homes and housing types that are genuinely affordable.
- A wide range of local jobs in the Garden City within easy commuting distance of homes.
- Beautifully and imaginatively designed homes with gardens, combining the best of town and country to create healthy communities, and including opportunities to grow food.
- 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.
- Strong cultural, recreational and shopping facilities in walkable, vibrant, sociable neighbourhoods.
- Integrated and accessible transport systems, with walking, cycling and public transport designed to be the most attractive forms of local transport.

3.0 Proposed Development

- 3.1 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. A visual of the proposed development is at Figure 2.



Figure 2: Visual of the proposed development

- 3.2 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;
- 296 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.

4.0 Baseline Conditions

4.1 This section collates baseline health and wellbeing data on the local population, proximity and availability of services at local medical services and pupil capacity within local schools.

Population

4.2 Mid-year calculations of the population of Local Authorities in the UK produced for 2019-2020 indicate that Welwyn Hatfield's estimated total population is 123,043. The average population of non-metropolitan districts within the same dataset equates to 114,463, which Welwyn Hatfield exceeds by approximately 7.5%.

4.3 Welwyn Hatfield district and the wider Hertfordshire county seemingly benefit from a greater level of health than the national average, with Welwyn Hatfield and Hertfordshire experiencing an average life expectancy of 82.4 years and 82.5 years respectively which exceeds the average for the UK of 81.1 years.

Medical

4.4 GP Surgeries

There are four GP surgeries within 1-mile of the proposed development, all of which are accepting new patients. The list of surgeries is shown in Table 1 (source: <https://www.nhs.uk/service-search/find-a-GP>).

GP Surgery Name	GP Surgery Address	Distance from Site	Taking New Patients
Garden City Practice	Birdcroft Road, Welwyn Garden City, Hertfordshire, AL8 6EH	0.2 miles	Yes
Peartree Lane Surgery	110 Peartree Lane, Welwyn Garden City, Hertfordshire, AL7 3UJ	0.3 miles	Yes
Parkway Surgery	20 Parkway, Welwyn Garden City, AL8 6HG	0.5 miles	Yes
Hollybush Lane Surgery	141 Hollybush Lane, Welwyn Garden City, Hertfordshire, AL7 4JS	0.9 miles	Yes

Table 1: GP Surgeries within one mile of the application site

4.5 Dental Practices

There are seven dental practices within 1-mile of the proposed development. As shown in Table 2, all of these are currently accepting new patients (source: <https://www.nhs.uk/service-search/find-a-dentist>).

Dental Practice Name	Dentist Practice Address	Distance from Site	Taking New Patients
Church Road Dental Practice	4a Church Road, Welwyn Garden City, Hertfordshire, AL8 6NE	0.2 miles	Yes
Herts Community NHS Trust	Parkway Community Health Clinic, Birdcroft Road, Welwyn Garden City, Hertfordshire, AL8 6EH	0.2 miles	Yes (currently working through backlog of patients from first lockdown under COVID-19.
Ivory Dental Clinic	10 Howardsgate, Welwyn Garden City, Hertfordshire, AL8 6BQ	0.3 miles	Yes
Peartree Clinic Welwyn	43 Peartree Lane, Welwyn Garden City, Herts, Herefordshire, AL7 3UA	0.4 miles	Yes
Woodhall Dental Practice	33 Cole Green Lane, Welwyn Garden City, Herts, AL7 3PP	0.6 miles	Yes
Handside Lane Surgery	178 Handside Lane, Welwyn Garden City, Herts, AL8 6SZ	0.6 miles	Yes
Beehive Dental Practice	27 Beehive Lane, Welwyn Garden City, Herts, AL7 4BH	1 mile away	Yes

Table 2: Dental Practices within one mile of the application site

Pharmacies

- 4.6 There are six pharmacies within 1-mile of the proposed development, as shown in Table 3 (source: <https://www.nhs.uk/service-search/find-a-pharmacy/>).

Pharmacy Name	Pharmacy Address	Distance from Site
Boots	126 Peartree La, Welwyn Garden City, Hertfordshire, AL7 3XW	0.2 miles
Boots	The Howard Ctr, Howardsgate, Welwyn Garden City, Hertfordshire, AL8 6HA	0.3 miles
Peartree Pharmacy	Peartree Lane Surgery, 110 Peartree Lane, Welwyn Garden City, Hertfordshire, AL7 3UJ	0.3 miles
Lloyds Pharmacy Inside Sainsbury's	Church Road, Welwyn Garden City, AL8 6SA	0.3 miles
Johns and Kelynack Ltd	Waitrose Store, Bridge Road, Welwyn Garden City, AL8 6AB	0.4 miles
Boots	31 Cole Green La, Welwyn Garden City, Hertfordshire, AL7 3PP	0.6 miles

Table 3: Pharmacies within one mile of the application site

Opticians

- 4.7 There are six opticians within a 1-mile of the proposed development, as shown in Table 4 (source: <https://www.nhs.uk/service-search/find-a-pharmacy/>).

Opticians Name	Optician Address	Distance from Site
Jeremy Solomon Opticians	62 Howardsgate, Welwyn Garden City, AL8 6BP	0.2 miles
Bayfields Opticians	39 The Howard Centre, Howardsgate, Welwyn Garden City, Hertfordshire, AL8 6HA	0.3 miles
Boots-Welwyn Garden City - Howard Centre	15 The Howard Centre, Howardsgate, Welwyn Garden City, Hertfordshire, AL8 6HA	0.3 miles
Dolland and Aitchison	24 Church Road, Welwyn Garden City, Hertfordshire, AL8 6PW	0.3 miles
Boots-Welwyn Garden City - Howard Gate	38-40 Howards Gate, Welwyn Garden City, Hertfordshire, AL8 6PU	0.3 miles
Scrivens Opticians	47 Howardsgate, Welwyn Garden City, AL8 6AP	0.3 miles

Table 4: Opticians within one mile of the application site

Education

4.8 There are 19 schools within a 1.4 mile walk of the site ((source: <https://www.compare-schoolperformance.service.gov.uk/>). As shown in Table 5, there is a total surplus capacity of 479 spaces for primary schools and 410 spaces for secondary schools.

School Name	Provision	Walking Distance from Site	Number of Pupils ¹	Capacity	Capacity – Yes or No?
Peartree Primary School	Ages 5-11 (primary)	(0.11 miles)	179	270	Yes
Holwell Primary School	Ages 5-11 (primary)	(0.36 miles)	363	420	Yes
Our Lady Catholic Primary School	Ages 4-11 (primary)	(0.45 miles)	211	243	Yes
Shallow Dell Primary and Nursery School	Ages 2-11 (primary)	(0.67 miles)	440	450	Yes
Creswick Primary & Nursery School	Ages 2-11 (primary)	(0.68 miles)	443	480	Yes
Applecroft School	Ages 3-11 (primary)	(0.74 miles)	452	450	No ²
Panshanger Primary School	Ages 3-11 (primary)	(0.85 miles)	235	240	Yes
Templewood Primary School	Ages 3-11 (primary)	(0.93 miles)	228	251	Yes
Stanborough School	Ages 16-18 (secondary)	(0.94 miles)	1094	1124	Yes
Ridgeway Academy	Ages 11-18 (secondary and 16-18)	(0.99 miles)	746	1126	Yes
Lakeside School	Ages 2-19 (primary, secondary and 16-18)	(1.02 miles)	70	70	No

¹ Information retrieved from <https://www.compare-school-performance.service.gov.uk/> (Accessed 09.09.20)

² Despite the government website stating that the school is currently oversubscribed, the Applecroft School Admissions Policy 2020-21 have 60 places for 2020-2021 admission (<https://www.applecroft.herts.sch.uk/policies/>)

Watchlytes Junior Mixed Infant and Nursery School	3-11 (primary)	(1.17 miles)	224	240	Yes
Harwood Hill Junior Mixed Infant and Nursery School	3-11 (primary)	(1.28 miles)	213	240	Yes
The Holy Family Catholic Primary School	3-11 (primary)	(1.29 miles)	210	217	Yes
Waterside Academy	3-11 (primary)	(1.3 miles)	192	210	Yes
Homerswood Primary and Nursery School	3-11 (primary)	(1.35 miles)	234	210	No
Commonswood Primary and Nursery School	4-11 (primary)	(1.35 miles)	471	510	Yes
St John's voluntary Aided Church of England Primary School	4-11 (primary)	(1.38 miles)	105	105	No ³
Springmead Primary School	3- 11 (primary)	(1.4 miles)	341	484	Yes

Table 5: Schools within a 1.4 mile walk of the application site

Conclusion

- 4.9 This section has identified that there is very good accessibility to a range of health and wellbeing facilities from the site. These services have existing capacity to cater for the health and wellbeing needs of future residents and support a high standard of living. This includes significant identified capacity within local schools to support pupil yield from the proposed development.

³ Despite the government website stating that the school is currently oversubscribed, St John's voluntary Aided Church of England Primary School Admissions Policy 2020-21 have 20 places for 2020-2021 admission

5.0 Healthy Urban Planning Checklist

- 5.1 The Healthy Urban Planning Checklist (March 2014) is an NHS publication, which, along with the relevant planning policies and Garden City principles, is relevant for understanding the health and wellbeing impact of the development proposals.
- 5.2 The checklist aims to promote healthy urban planning by ensuring that the health and wellbeing implications of local plans and major planning applications are consistently taken into account. By bringing together planning policy requirements and standards that influence health and wellbeing, the checklist seeks to mainstream health into the planning system.

Healthy Housing				
Issue	Key Questions	Yes/No/Not relevant Comment	Policy Requirements and Standards	Why is it important
Healthy Design	a) Does the proposal meet all the health and wellbeing credits contained in the Code for Sustainable Homes for daylighting, sound insulation, private space and Lifetime Homes?	<p>a) Yes.</p> <p>While the Code for Sustainable Homes is now withdrawn, all proposed units meet or exceed space standards and future residents would benefit from ample and varied amenity space provision, including at least one private amenity space for each unit. Private amenity spaces are of a size and orientation that is useable and designed with landscaped buffers to the public realm to maintain a sense of privacy.</p> <p>The number of dual or triple aspect units has been maximised to ensure favourable outlook and levels of daylight and sunlight would be achieved.</p> <p>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</p>	<p>Draft Policy SADM11 (Amenity and Layout) 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.</p> <p>Technical housing standards – nationally described space standard outline minimum requirements of a number of design matters.</p> <p>BRE Guidance sets out a number of requirements to ensure occupiers and neighbours experience adequate lighting.</p>	<p>Satisfying the health and wellbeing credits can help improve the code level and meet carbon dioxide emissions targets.</p> <p>Good daylighting can improve the quality of life and reduce the need for energy to light the home.</p> <p>Improved sound insulation can reduce noise disturbance and complaints from neighbours.</p> <p>The provision of an inclusive outdoor space which is at least partially private can improve the quality of life.</p>

		<p>of amenity for future residents.</p> <p>Noise mitigation measures including enhanced glazing are proposed to ensure the development meets the relevant WHO and BRE guidelines. The units and amenity spaces in the development have been acoustically assessed to verify this.</p> <p>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>		
Accessible Housing	<p>a) Does the proposal provide accessible homes for older or disabled people?</p> <p>b) Does the proposal ensure that every non-ground floor dwelling is accessible by a lift?</p>	<p>a) 10% of units 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).</p> <p>b) Yes, lifts are provided to all apartment blocks.</p>	<p>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.</p>	<p>Accessible and easily adaptable homes can meet the changing needs of current and future occupants.</p>
Healthy Living	<p>a) Does the proposal provide dwellings with adequate internal space,</p>	<p>a) Yes. All units meet or exceed the Technical Housing Standards</p>	<p>Policy D1 (Quality of Design) promotes the development that</p>	<p>Sufficient space is needed to allow for the preparation and consumption of food</p>

	<p>including sufficient storage space and separate kitchen and living spaces?</p> <p>b) Does the proposal encourage the use of stairs by ensuring that they are well located, attractive and welcoming?</p>	<p>minimum space requirements.</p> <p>b) Yes. All staircases have been designed to be welcoming to users, are located for convenient access and feature dimensions that will ensure the stairs are functional for all users.</p>	<p>incorporates a number of principles including:</p> <ul style="list-style-type: none"> - Character - Continuity and Enclosure - Quality of the Public Realm - Ease of Movement - Legibility - Adaptability - Diversity <p>It is considered that development which incorporates all of these principles would promote design that encourages a healthy lifestyle.</p>	<p>away from the living room to avoid the 'TV dinner' effect.</p> <p>Rather than having lifts at the front and staircases at the back of buildings hidden from view, it is preferable to have them located at the front to encourage people including those that are able to use them.</p>
Housing Mix and Affordability	Does the proposal provide affordable family sized homes?	<p>Yes.</p> <p>10% affordable housing is proposed with a tenure split of 20 (69%) shared ownership and 9 (31%) social rented units.</p> <p>In terms of family sized homes, a unit mix of 26 x 3-bed (9%); and 8 x 4-bed (3%) is proposed.</p> <p>6 of the affordable units are family sized 3-bed units.</p> <p>The affordable housing element of the proposals is designed to the same high standard as the remainder of the development.</p>	<p>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), subject to viability. The Plan expects a range of dwelling types, tenures and sizes (Policy H8 Dwelling Type and Tenure).</p>	<p>The provision of affordable housing can create mixed and socially inclusive communities. The provision of affordable family sized homes can have a positive impact on the physical and mental health of those living in overcrowded, unsuitable or temporary accommodation.</p> <p>Both affordable and private housing should be designed to a high standard ('tenure blind').</p>

Active Travel				
Issue	Key Questions	Yes/No/Not relevant Comment	Policy Requirements and Standards	Why is it important
Promoting walking and cycling	Does the proposal promote cycling and walking through measures in a travel plan, including adequate cycle parking and cycle storage?	<p>The proposals seek to encourage sustainable modes of travel through the provision of Electric Vehicle Charging Points (over 20% provision), a car club bay and cycle parking.</p> <p>289 secure long term cycle parking spaces for residents are proposed, as well as 10 secure long term and 8 short term visitor spaces.</p> <p>A Framework Travel Plan accompanies the application submission which sets out a range of measures that will be implemented to encourage future residents and visitors to travel by sustainable modes.</p>	<p>Policy M1 (Integrating Transport and Land Use) states that in considering proposals for development, the Council will give priority to walking and more sustainable modes of travel.</p> <p>Policy M3 (Green Travel Plans) requires development that exceeds set thresholds to be supported by a Green Travel Plan which explains how a development will promote sustainable movement and travel through means of planning conditions or a S106 Agreement.</p> <p>Policy M14 (Parking Standards For New Development) seeks to promote walking and cycling through outlining the need for new development to accord with supplementary planning guidance which provides minimum parking standards for cycling and maximum parking standards for vehicles.</p>	<p>A travel plan can address the environmental and health impacts of development by promoting sustainable transport, including walking and cycling.</p> <p>Cycle parking and storage in residential dwellings can encourage cycle participation.</p>
Safety	a) Does the proposal include traffic management and calming measures and safe and well-lit pedestrian and cycle crossings and routes?	<p>The proposals for the main access to the development (BioPark Drive) are designed to highways safety standards including a designated footway/cycleway. The landscape strategy for the hard surfaced areas of the site are designed with variable paving materials to delineate the access road from pedestrian routes.</p>	<p>Policy M5 (Pedestrian Facilities) encourages development that prioritises pedestrian access in layouts through inclusion of safe and direct routes.</p> <p>Policy M6 (Cycle Routes and Facilities) places emphasis on the need for development proposals to encourage cycling through inclusion of safe cycle routes and parking for cycles.</p>	<p>Traffic management and calming measures and safe crossings can reduce road accidents involving cyclists and pedestrians and increase levels of walking and cycling.</p>

Connectivity	Does the proposal connect public realm and internal routes to local and strategic cycle and walking networks and public transport?	<p>Public realm and routes for pedestrians and cyclists under the proposed development will integrate into the existing wider network, namely the wide footway along the site's boundary to Broadwater Road which features a pelican crossing north of the junction with Otto Road to promote safe passage for pedestrians. High quality footway provision continues to and beyond the next major junction (Hydeway) which leads to a bridge with a footway over the railway providing a convenient means of access to the railway station and town centre to the north.</p> <p>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.</p>	<p>Policy M5 (Pedestrian Facilities) says that WHBC will seek improvements in facilities for the safe and convenient movement of pedestrians.</p> <p>Policy M3 (Green Travel Plans) requires development proposals to be submitted with a Green Travel Plan to set out the measures under the proposed development that will encourage use of sustainable transport including but not limited to, connectivity to existing transport networks surrounding the site.</p>	Developments should prioritise the access needs of cyclists and pedestrians. Routes should be safe, direct and convenient and barriers and gated communities should be avoided. Developments should be accessible by public transport.
Minimising car use	Does the proposal seek to minimise car use by reducing car parking provision, supported by the controlled parking zones, car free development and car clubs?	The proposed development seeks to limit car use by providing car parking in accordance with the anticipated needs of future residents at a ratio of 0.76 spaces per dwelling.	Policy M2 (Transport Assessments) seeks to ensure development proposals demonstrate that measures are taken to minimise vehicular movement, largely through improvements to passenger transport, pedestrian and cycling facilities.	Space for pedestrians and cyclists should be given priority over commercial and private vehicles. Maximum car parking levels allows for provision to be reduced as far as practicable.

		The accessible location of the site close to the train station and town centre of Welwyn Garden City, as well as the provision of a car club bay (with Electric Vehicle Charging) and safe and secure cycle parking will mitigate the need for future occupiers to use private vehicles.		Car clubs can be effective in reducing car use and parking demand at new residential developments
Healthy Environment				
Issue	Key Questions	Yes/No/Not relevant Comment	Policy Requirements and Standards	Why is it important
Construction	Does the proposal minimise construction impacts such as dust, noise, vibration and odours?	Yes. A Draft Construction Management Plan has been submitted as part of the application and outlines the measures that will be taken to ensure all construction impacts are minimised and managed effectively.	N/A	Construction sites can have a negative impact on an area and can be perceived to be unsafe. Construction activity can cause disturbance and stress which can have an adverse effect on physical and mental health. Mechanisms should be put in place to control hours of construction, vehicle movements and pollution. Community engagement before and during construction

				can help alleviate fears and concerns.
Air Quality	Does the proposal minimise air pollution caused by traffic and energy facilities?	The Air Quality Assessment demonstrates that the future occupants of the proposed development will not be exposed to unacceptable air quality.	Policy R18 (Air Quality) stresses the regard that the Council will have to the potential effects of a development on local air quality when determining planning applications. It states that consideration will be given to both operational characteristics of the development and to the traffic generated by it.	The long-term impact of poor air quality has been linked to life-shortening lung and heart conditions, cancer and diabetes.
Noise	Does the proposal minimise the impact of noise caused by traffic and commercial uses through insulation, site layout and landscaping?	Yes. The proposed development would be sited away from roads that may generate adverse levels of noise through traffic. The design of the proposal has considered the proximity to the adjacent railway and has sought to minimise its impact on the proposed development, particularly amenity spaces, through the introduction of mitigation measures.	Policy R19 (Noise and Vibration Pollution) notes that development proposals will not be granted planning permission if they are likely to generate unacceptable noise or vibration for other land uses or would be affected by unacceptable levels from other land uses. It explains that permission will be granted where appropriate conditions may be imposed to ensure an adequate level of protection against noise or vibration can be attained.	Reducing noise pollution helps improve the quality of urban life.
Open Space	<p>a) Does the proposal retain or replace existing open space and in areas of deficiency, provide new open or natural space, or improve access to existing spaces?</p> <p>b) Does the proposal set out how new open space will be managed and maintained?</p>	<p>a) The proposal features 3,023 sqm of new public open space featuring an extensive and high quality landscaping scheme.</p> <p>b) A detailed landscape maintenance and management schedule is set out at Section 5.7 of the Design and Access Statement.</p>	Policy OS3 (Play Space and Informal Open Space Provision in New Residential Development) sets out that substantial new residential development will be expected to contribute to the provision of informal open space, where the increased demands generated by the new households cannot be met by current levels of provision. Where new space is created, it must be easily accessible to pedestrians and cyclists and must be designed to be a safe and secure environment for all users. The type of facility to be provided will be based on meeting NPFA standards.	<p>Access to open space has a positive impact on health and wellbeing. Living close to areas of green space, parks, woodland and other open space can improve physical and mental health regardless of social background.</p> <p>To maintain the quality and usability of open spaces an effective management and maintenance regime should be put in place.</p>

Play Space	Does the proposal provide a range of play spaces for children and young people?	The proposal includes three 'doorstep' play space, equivalent to 260 sqm, with sensory equipment for use by residents and the wider community, as well as significant opportunity for informal play in amenity areas spread throughout the site.	Policy OS3 (Play Space and Informal Open Space Provision in New Residential Development) requires substantial new residential development to contribute to the provision of children's play space where existing provision is not adequate for increased demand generated by new households.	Regular participation in physical activity among children and young people is vital for healthy growth and development. The location of play spaces should be accessible by walking and cycling routes which are suitable for children to use.
Biodiversity	Does the proposal contribute to nature conservation and biodiversity?	The existing site has negligible ecological value with only a small number of areas containing non-native tree and shrub species. As outlined in the Ecological Impact Assessment, the landscaping and ecological mitigation proposals result in exceptionally high level of Biodiversity Net Gain of over 750%.	Policy R11 (Biodiversity and Development) requires new development proposals to demonstrate how they would contribute positively to the biodiversity of the site through retention/enhancement of natural features, promotion of natural areas and wildlife corridors, translocation of habitats where necessary and use of locally native species.	Access to nature and biodiversity can contribute to mental health and wellbeing. New development can improve existing, or create new, habitats or use design solutions (green roofs, living walls) to enhance biodiversity.
Local Food Growing	Does the proposal provide opportunities for food growing, for example by providing allotments, private and community gardens and green roofs?	An "Orchard Hideaway" is proposed for residents, as well as an outdoor dining area with edible planting. The proposed development is sited immediately adjacent to existing allotments which are sited to the north-west of the site and will provide future occupiers with the opportunity for food growing. There are extensive green roofs proposed across the development.	Policy OS4 (Allotments) states that planning permission will not be granted for proposals resulting in the loss of allotments in any area where there is a reasonable expectation of continuing long-term demand.	Providing space for local food growing helps promote more active lifestyles, better diets and social benefits.
Flood Risk	Does the proposal reduce surface water flood risk through sustainable urban drainage techniques, including storing	The site is within Flood Zone 1 and has a very low risk of flooding from all sources. A sustainable urban drainage system is	Policy R8 (Floodplains and Flood Prevention) states that within floodplains identified on the Proposal Map, planning permission will not be granted where proposals	Flooding can result in risks to physical and mental health. The stress of being flooded and cleaning up can have a

	rainwater, use of permeable surfaces and green roofs?	integrated into the proposals to manage surface water run off. The system includes several SuDS features, detailed in the application Flood Risk Assessment and Drainage Strategy, including permeable paving, green roofs and an attenuation basin.	would decrease capacity of the floodplain to store flood water, impede the flow of water, increase the number of people and properties at risk from flooding or for properties outside floodplains, increase in flooding downstream from run-off. Policy R9 (Water Supply and Disposal) restricts development that would be detrimental to existing water abstractions, fisheries, amenity and nature conservation. It also discourages development that would cause adverse change in flows or levels in groundwater, rivers, streams, ditches, springs, lakes or ponds in the vicinity. Policy R10 (Water Conservation Measures) looks to ensure new development incorporates water conservation measures including sustainable drainage systems, water storage systems, soft landscaping and permeable surfaces to reduce surface water run-off.	significant impact on mental health and wellbeing. It is likely that increasing development densities and building coverage coupled with more frequent extreme weather events will increase urban flood risk.
Overheating	Does the design of buildings and spaces avoid internal or external overheating, through use of passive cooling techniques and urban greening?	The proposed landscaping scheme will have a significant urban greening effect, particularly when compared to the existing baseline conditions of the site. A fabric-first approach has been taken to the proposed energy efficiency measures to minimise the need for active cooling within the development.	Policy SADM13 of the draft 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.	Climate change with higher average summer temperatures is likely to intensify the urban heat island effect and result in discomfort and excess summer deaths amongst vulnerable people. Urban greening – tree planting, green roofs and walls and soft landscaping can help prevent summer overheating.

Vibrant Neighbourhoods				
Issue	Key Questions	Yes/No/Not relevant Comment	Policy Requirements and Standards	Why is it important
Health Services	Has an impact on healthcare services been addressed?	The existing capacity of nearby healthcare and educational services is explored in within this Statement. Planning obligations with regard to community infrastructure will be determined post-submission of the planning application in consultation with the Council and County Council. This consultation will include involvement from the local NHS.	Policy CLT12 (New Community Facilities) sets out that development of community facilities will be granted planning permission in residential areas where proposals would not harm the amenity of existing residential properties, new residential developments in areas where there is a deficiency and where demand for the facility in an area is sufficient for the catchment of the proposed facility.	Poor access and quality of healthcare services exacerbates ill-health, making treatment more difficult. The provision of support services, including advice on healthy living can prevent ill health.
Education	Has the impact on primary, secondary and post-19 education been addressed?			Access to a range of primary, secondary and post-19 education improves self-esteem, job opportunities and earning capability.
Access to social infrastructure	<p>a) Does the proposal contribute to new social infrastructure provision that is accessible, affordable and timely?</p> <p>b) Have opportunities for multi-use and the co-location of services been explored?</p>			<p>a) The proposed community hub provides a focal point to the development with opportunities for residents and visitors to socialise.</p> <p>b) The community hub is proposed as flexible floorspace which allows for the co-location of café and gym uses.</p>
Local employment and healthy workplaces	a) Does the proposal include commercial uses and provide opportunities for local employment and training, including temporary construction and permanent 'end-use' jobs?	<p>a) Yes. Employment opportunities will be generated through the operation of the proposed community hub, namely the gym.</p> <p>A detailed breakdown of employment</p>	<p>Policy EMP1 (Employment Areas) lists areas designated as Employment Areas, including EA1 (Welwyn Garden City Industrial Area) which pertains to the application site.</p> <p>Policy EMP2 (Acceptable Uses in Employment Areas) describes the requirements</p>	<p>Unemployment generally leads to poverty, illness and a reduction in personal and social esteem. Employment can aid recovery from physical and mental illnesses.</p> <p>Creating healthier workplaces can reduce</p>

		opportunities relating to construction and operation is provided in the Economic Statement submitted with this application.	of employment opportunities in areas designated for employment under Policy EMP1. Policy EMP3 (Mixed Use Development Site at Broadwater Road West) seeks to ensure development of the wider Broadwater Road West site shall be in accordance with EMP2 and other relevant policies of the plan.	ill health and employee sickness absence.
Access to local food shops	<p>a) Does the proposal provide opportunities for local food shops?</p> <p>b) Does the proposal avoid an overconcentration or clustering of hot food takeaways in the local area?</p>	<p>a) The site is in easy walking and cycling distance of local food shops within the town centre and will generate additional custom for these retailers.</p> <p>b) The proposal does not include any hot food takeaways or restaurants.</p>		A proliferation of hot food takeaways and other outlets selling fast food can harm the vitality and viability of local centres and undermine attempts to promote the consumption of healthy food, particularly in areas close to schools.
Public realm	<p>a) Does the design of the public realm maximise opportunities for social interaction and connect the proposal with neighbouring communities?</p> <p>b) Does the proposal allow people with mobility problems or a disability to</p>	<p>a) Yes. The layout and more landscape has prioritised opportunities for socialising and recreation. The design seeks to enhance connectivity by safeguarding pedestrian and cycle routes to the north to the Wheat Quarter and to adjacent residential development to the east and south.</p> <p>b) Yes. The proposals enable those with a disability or mobility</p>	Policy D4 (Quality of the Public Realm) outlines the Council's expectation that new development, where appropriate, will either create or enhance public areas and design of the public realm for ease of movement.	<p>The public realm has an important role to play in promoting walking and cycling, activity and social interaction. It also affects people's sense of place, security and belonging. It is a key component of a lifetime neighbourhood.</p> <p>Shelter, landscaping, street lighting and seating can make spaces attractive and inviting.</p>

	access buildings and places?	impairment to be able to move freely around the site and public space, and within the proposed residential cores and individual dwellings. Lifts are provided to all apartment blocks.		
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Table 6: Healthy Urban Planning Checklist Table

6.0 Garden City Principles

- 6.1 Considerations of health and wellbeing are intrinsically linked to the Garden City philosophy, which seeks to engender community spirit and self-sufficiency through settlement and neighbourhood design. Whilst Louis de Soissons’ masterplan for Welwyn Garden City accommodated car-based travel, the designs were intended to encourage significant walking and cycling through the proximity of zoned uses and attractive, green, landscaped spaces.
- 6.2 The TCPA have adapted the traditional Garden City philosophy to produce a set of principles that can be applied to 21st Century developments. From an early stage, the Broadwater Gardens scheme has been influenced by Garden City Principles, and the scheme’s response to the TCPA principles is explored in Table 7 below.

TCPA Garden City Principle	Proposed Development
Strong vision, leadership and community engagement	<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>
Mixed-tenure homes and housing types that are genuinely affordable.	<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>
A wide range of local jobs in the Garden City within easy commuting distance of homes	<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.</p>
Beautifully and imaginatively designed homes with gardens,	<p>The proposed homes ensure a high standard of residential amenity for future residents. All units meet or exceed internal space standards and</p>

<p>combining the best of town and country to create healthy communities, and including opportunities to grow food.</p>	<p>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 and 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.</p>

	<p>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 7: Garden City Principles Table

7.0 Conclusion

7.1 This Statement is submitted in support of the planning application at BioPark, Broadwater Road, Welwyn Garden City, AL7 3AX for the following development:

“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.”

7.2 This Statement identifies that there is very good accessibility to a range of health and wellbeing facilities from the site. These services have existing capacity to cater for the health and wellbeing needs of future residents and support a high standard of living. This includes significant identified capacity within local schools to support pupil yield from the proposed development.

7.3 Analysis of how the proposed development responds to the NHS Healthy Urban Planning Checklist (2014) has revealed that the proposal responds positively to all criteria within the checklist, namely Healthy Housing, Active Travel, Healthy Environment and Vibrant Neighbourhoods.

7.4 Considerations of health and wellbeing are intrinsically linked to Garden City Principles. This Statement has identified that the Broadwater Gardens scheme is consistent with the TCPA Garden City Principles (2020) and represents a high quality and appropriate 21st Century addition to the Garden City ethos.

7.5 Overall, this statement demonstrates that the proposed development will support an enhanced level of health and wellbeing for future residents. Based on these conclusions, it is considered that the proposed development accords with Chapter 8 of the NPPF relating to “*Promoting Healthy and Safe Communities*” as well as with the broader policy context outlined in WHBC’s Local Plan and the Broadwater West SPD.



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