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Welwyn/Hatfield Local Plan EIP Hearing Statement

Matters 7 and 9

Iceni Projects Limited on behalf of
Plutus Estates (WGC) Ltd

October 2017

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ON BEHALF OF PLUTUS
ESTATES (WGC) LTD

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**Welwyn/Hatfield Local Plan EIP Hearing
Statement**
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1. INTRODUCTION

- 1.1 This hearing statement is made on behalf of Plutus Estates (WGC) Ltd, herein referred to as “Plutus”.
- 1.2 Plutus are the owners of land at Broadwater Road, Welwyn Garden City (known as the former Shredded Wheat Factory) – land allocation Pea02b in the draft Local Plan.
- 1.3 Plutus have partnered with Metropolitan Housing Trust Ltd (MHT), who are one of the UK’s leading providers of affordable housing and care and support services, to bring forward a detailed planning application on the Broadwater Road site. MHT have a long-standing relationship with WGC on developing the Rank Xerox site.
- 1.4 On 30 March 2017, Welwyn Hatfield Borough Council resolved to grant planning permission for a residential-led mixed-use redevelopment delivering up to 850 new homes, together with office, retail, leisure, open space, highways improvements, landscaping and other benefits (application ref: N6/2015/0294/PP).
- 1.5 Following a review of the consented scheme, alterations have been identified to address the limitations of the consented scheme and achieve a more successful planning outcome for all parties.
- 1.6 Whilst it is noted that the scheme is materially different, the emerging proposal has specifically retained the garden city principles that are outlined in the SPD but now includes an increased amount of affordable and market housing, together with a refined and more bespoke strategy for the Listed Building and community/commercial heart of the project.
- 1.7 The proposed changes to the scheme are detailed in the table below:

Component	Consented Scheme	Emerging Proposal
Residential Units	850	1,491
Affordable Housing Units	50	464
Affordable Housing Percentage	6%	31%

Commercial and Community Floorspace	14,359sq.m	12,858sq.m
Car Parking	1,023	1,140

1.8 The proposed changes are summarised as follows:

- North Site:
 - An enhanced community core within the heart of the development to create increased public performance space, art uses, museum and civic/community uses;
 - Amplification of employment strategy for the site through introduction of flexible working complex within Listed Building to provide focus for small and new start-up businesses;
 - Removal of Hotel use;
 - Reworking of design strategy to the north, west and east of the Listed Building in the north site to optimise the development potential of the site, whilst creating a more appropriate design response to the Listed Building, elevating residential yield from 357 to circa 790 units:
 - New residential block to the north of Listed Building
 - Enhanced focus given to front (eastern elevation) of Listed Building through enhanced boulevard and landscape setting
 - Densification of townhouse areas into apartment blocks, consistent with the predominant and defining urban form to the east of the Listed Building.
- South Site:
 - Retention of residential blocks in same approximate locations as south site masterplan and within same height parameters
 - Removal of residential block in southeastern corner of south site to create a public square against the listed building.
 - More efficient and buildable residential blocks to increase south site dwelling yield from 493 to circa 700 units

- Increase in parking provision across the site and an increase in cycling provision and the provision of electric car club vehicles for residents, though a decrease in the parking ratio per dwelling from 1.02 to circa 0.7.

2. MATTER 7 – TARGETS FOR GROWTH: ARE THEY APPROPRIATE?

Question i) – Employment: What are the ramifications of the loss of employment floorspace to dwellings for future levels of employment?

- 2.1 In terms of employment, it is prudent to consider the Employment Density Guide produced by the Homes and Communities Agency. Originally produced in 2010 and last updated in 2015, this guide is the recognised industry-wide point of reference for projected job creation and is used by local authorities, developers and surveyors.
- 2.2 Employment density refers to the average floorspace (in m²) per full-time equivalent (FTE) member of staff. It is used as a measure of intensity of building use and an indicator of how much space each person occupies within the workspace. In our opinion, the levels of job generation that can be sustained in schemes providing B1 floorspace for Small and Medium sized Enterprises (SMEs) is significantly higher than those indicated in the Employment Density Guide.
- 2.3 Taking the Shredded Wheat site as an example, the nature, form and amount of commercial floorspace proposed is considered likely to generate far higher employment densities than those outlined in the Employment Density Guide and a big increase in levels of employment generation on the site. Accordingly, it is our belief that significantly higher levels of job densities can be achieved on the most sustainably located development sites in the District when these are redeveloped for mixed-use residential/office development and that the application of standard formula assumptions considerably underestimates levels of jobs that can be sustained.
- 2.4 Given the above, it is our contention that the redevelopment of industrial sites in existing/previous B2 and B8 use can generate significant amounts of homes and jobs when redeveloped for mixed-use higher density development.

Question ii) – Housing: Are the constraints imposed by infrastructure requirements fully justified?

- 2.5 Infrastructure constraints (and opportunities) in the District have significant implications for the amount and type of housing in the District and the spatial approach that has been pursued. In this regard, strategic greenfield sites provide opportunities for new purpose-built education and road infrastructure on the edges of settlements, whereas strategic brownfield sites like the Shredded Wheat Factory are constrained by the inability to expand existing education infrastructure but offer opportunities to achieve high densities due to enhanced public transport infrastructure. Accordingly, sustainably located brownfield sites provide opportunities to raise housing densities to optimise brownfield land capacity, whereas strategic greenfield sites provide opportunities to create new communities based around family housing.

- 2.6 Our concern is if the Plan applies the same blanket dwelling mix requirement for a brownfield site with good public transport and poor education infrastructure as it does for a strategic greenfield site with scope to provide purpose-built education infrastructure but limited public transport infrastructure, the opportunity to provide the most sustainable development strategy will be lost.
- 2.7 The Council's approach to dwelling mix is outlined throughout the Local Plan, and it is considered that the Shredded Wheat development successfully recognises this and promotes a healthy dwelling mix.

3. MATTER 9 – OVERALL DEVELOPMENT STRATEGY

Is the overall development strategy being advanced by the Council sound?

- 3.1 In order to assess whether the overall development strategy is sound, the relevant policies included within the Local Plan are detailed below:

Policy SP 1 – Delivering Sustainable Development

- 3.2 It is suggested that the existing wording of this particular policy is supplemented as follows (identified in bold) in order to promote higher densities on previously developed land with the best transport links:

- 3.3 That the location of new development should deliver a sustainable pattern of development which prioritises previously-developed land; minimises the need to travel by directing growth to those areas with good transport networks and which are well served by jobs, services and facilities; protects areas of highest environmental value; and avoids areas of high flood risk. **Development densities should be maximised on such sites, with parking and design standards relaxed to enable greater densities to be achieved.**

Policy SP 9 – Place Making and High Quality Design

- 3.4 This element of the Local Plan is considered to be acceptable and will help to achieve higher densities in accessible locations in order to minimise the extent of Green Belt release and maximise the number of homes in close proximity to public transport.

Policy SADM 11 – Amenity and Layout

- 3.5 Although the general thrust of the policy is supported, certain aspects of the policy such as part i) concerning dual aspect units and part ii) concerning minimum space standards should be amended. It is therefore suggested that these elements of the Local Plan are amended in order to facilitate flexible and innovative design solutions which will, in turn, enhance opportunities for home ownership.

Part i) b) should be amended as per the bold text below, as securing all flats as dual aspect is not always possible to achieve, especially on difficult urban sites where viability is a genuine constraint to delivery. This is highly pertinent in a District such as Welwyn Hatfield, where the Plan is relying on significant amounts of Green Belt land to accommodate the District's housing requirements, and therefore policy should be applied flexibly to maximise the amount of housing from previously developed land.

i) All proposals will be required to create and protect a good standard of amenity for buildings and external open space in line with the Council's Supplementary Design Guidance, and in particular should ensure:

b) **The majority of dwellings are dual aspect to enable passive ventilation and avoid the need for mechanical ventilation, subject to any noise and air pollution mitigation measures that are required to make the proposal acceptable.**

Part ii) should be amended to provide greater flexibility on space standards for developers to deliver homes on brownfield land, especially when the development is a conversion which often do not lend themselves to national space standards. Schemes for first time buyers struggling to get onto the housing ladder should also be provided with greater latitude on this point:

~~As a minimum, all Proposals for C3 dwellings will be required~~ **should aim** to meet the Nationally Described Space Standard, unless there are genuine reasons to justify deviating from the standards ~~it can be robustly demonstrated that this would not be feasible or viable.~~

Policy SADM 12 – Parking, Servicing and Refuse

3.6 In this instance, the thrust of the policy is very much supported, as is the thrust of the Council's parking standards which allow reductions based on the relative sustainability of a site's location in relation to public transport and the town centre. However, it is considered that the policy could go further by advocating the concept of car free development in those locations with the greatest accessibility to public transport.

3.7 Therefore, it is recommended that an additional sentence is added in the parking section of Policy SADM 12 after bullet iii) to make positive provision for car free development on the most sustainable sites in the District, as follows:

3.8 **"A combination of electric charging points, car pools and a significant element of car-free residential development should be considered on those sites with the highest public transport accessibility."**

Summary

3.9 The Local Plan advocates the use of sustainable land use principles that provide the necessary homes, employment opportunities and infrastructure for the successful delivery of the development strategy. The proposal pertaining to the Shredded Wheat factory is considered to be a flexible scheme that has been designed appropriately to fit the circumstances, and, as such, aligns with the overall objectives of the Local Plan.

- 3.10 However, it is considered that the Local Plan needs to be sufficiently flexible to enable the Council to facilitate the development of Brownfield land. If this land is not fully utilised and maximised, the extent of Green Belt land-take will be greater than it needs to be. The amended changes detailed above will facilitate increased flexibility and enable higher density schemes to be brought forward in compliance with policy, rather than attracting needless policy conflicts.
- 3.11 The amended Shredded Wheat proposal promotes higher density development on previously-developed land with the best transport links. It is considered that development densities should be maximised on such sites, with parking and design standards relaxed to enable greater densities to be achieved.
- 3.12 The ability to achieve higher densities in accessible locations is supported in order to minimise the extent of Green Belt release and maximise the number of homes in close proximity to public transport.
- 3.13 The overall development strategy is likely to result in an augmented uptake of brownfield land, and this is considered to be positive and appropriate. With the alterations detailed above, the general strategy will allow for the successful implementation of the aims and objectives of the Local Plan in a sustainable way that maximises brownfield land delivery and achieves greater brownfield: greenfield land ratios.