

Planning Statement

Former Beales Hotel

Relating to site at
Former Beales Hotel, Comet Way, Hatfield, AL10 9NG
June 2022

The logo for hgh consulting, consisting of the lowercase letters 'hgh' in a white, sans-serif font, centered within a white square border on a red background.

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Contents

1.0	Introduction.....	3
2.0	Site Description and Surrounding Area	5
3.0	Planning History and Pre-Application	9
4.0	Development Proposals	12
5.0	Planning Policy and Guidance.....	14
6.0	Planning Assessment	17
7.0	Economic Statement	35
8.0	Conclusions	40
	Appendix 1: Council’s Pre-application Response.....	43

1.0 Introduction

- 1.1 This Planning Statement has been prepared on behalf of Hatfield Park Homes Ltd (“the Applicant”) to support a planning application submitted to Welwyn Hatfield Borough Council (“WHBC” or “the Council”) in respect of the proposed development at Beales Hotel (“the Site”).
- 1.2 The application seeks full planning permission for:

“Demolition of existing building and construction of residential units (Use Class C3) with private and communal amenity space, landscaping, access, associated car and cycle parking, refuse and recycling storage and supporting infrastructure.”



Figure 1: Site Location Plan

- 1.3 The development will provide 145 residential units (63x 1-beds, 52 x2 beds, and 30x 3-beds) over a 5-7 storey building comprising 4 cores arranged around communal podium gardens. The scheme consists of 2,063.6sqm of communal amenity space, 4,853.3sqm of private amenity space in total and associated landscaping. 125x car parking spaces and 176x cycle parking spaces will be provided.
- 1.4 The scheme has been subject to pre-application discussions with the Council on 15th February 2021 where the principle of development was supported. The officers provided written advice (Appendix 1), which has been considered and responded to in the design.

1.5 This Planning Statement should be read in conjunction with all supporting plans and documents submitted with the application which are as follows:

- Application Form (hgh Consulting);
- Existing and Proposed Plans, Elevations and Sections (Alan Camp Architects);
- Design and Access Statement (Alan Camp Architects);
- Landscape Strategy and Plans (Guarda Landscape);
- Transport Statement, Framework Travel Plan, Parking Plan (RPS Group);
- Daylight and Sunlight Assessment and Light Within Assessment (Anstey Horne);
- Flood Risk Assessment and SuDS (EAS);
- Energy and Sustainability Strategy (Love Design Studio);
- Air Quality Assessment (Air Pollution Services);
- Ecology Report and Biodiversity Net Gain (Green Environmental Consultants);
- Financial Viability Assessment (Kempton Carr Croft);
- Noise Impact Assessment (Noise Solutions);
- Fire Report (BB7);
- Arboricultural Impact Assessment and Tree Constraints Plan (David Clarke Landscape);
- Basement Impact Assessment (CampBell Reith);
- Phase I Geoenvironmental Assessment Report (Symbiotic Solutions); and
- Heritage, Townscape and Visual Impact Assessment (Bidwells).

Structure of the pre-application planning statement

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

- **Section 2** provides a description of the Site and local area;
- **Section 3** sets out the relevant planning history for the Site and surrounding area;
- **Section 4** summarises the development proposal;
- **Section 5** outlines the planning policy framework;
- **Section 6** justifies the proposed development against the relevant planning policy and material considerations; and
- **Section 7** provides our conclusions with respect to the acceptability of the development proposal.

2.0 Site Description and Surrounding Area

Site Location and Description

- 2.1 The Site (Figure 2) comprises a broadly rectangular parcel of land and measures circa 0.64 ha (1.59 acres). It is located on the western side of Comet Way (A1001) in the town of Hatfield and is approximately 0.1 miles to the north of the A1001 intersection with Cavendish Way. The Site is occupied by the former Beales Hotel; a two-storey building, with areas of hardstanding land providing associated car parking.

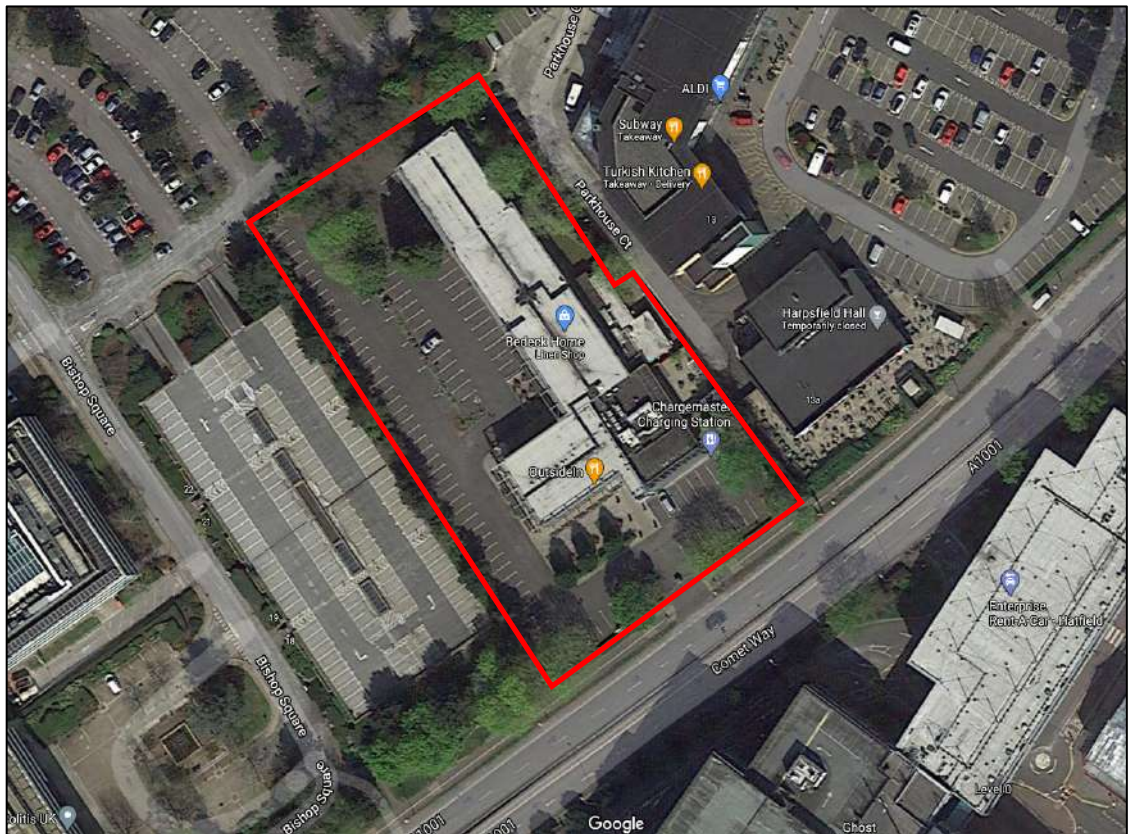


Figure 2: Site Location

- 2.2 The hotel closed in 2020 following declining trade and demand for hotel rooms. After a short period of vacancy, it is being temporarily operated as a hostel by the YMCA.

Surrounding Area

- 2.3 A large car park associated with the Hatfield Business Park borders the Site to the north and west. Parkhouse Court, a mixed use development, is located to the east of the Site, and includes Harpsfield Hall pub, an Aldi, restaurants, other commercial businesses, a Travelodge and car park. Adjacent to the Site's northeastern boundary are four storey residential flats, which sit on top of double storey ground floor commercial units, located on Parkhouse Court. Comet Way (A1001) borders the Site to the south

2.4 The Site is in a sustainable location. It is within a 5-minute walk to the Comet Hotel bus stop providing regular services to South Hatfield, Coreys Mil, Welwyn Garden City, Potters Bar, Broxbourne, Hatfield, Queensbury, Cockfosters, Watford, Hermel Hempstead, Hitchin, St Albans and Luton. The Site is also approximately 1 mile west of Hatfield Railway Station, serviced by Great Northern and Thameslink, providing direct and regular services to London Kings Cross Station, Moorgate, Welwyn Garden City, Royston and Cambridge.

Planning Designations

2.5 According to the adopted Welwyn Hatfield District Plan Policy Map (2005) (Figure 3), the Site has no planning policy designations. The Site is, however, situated adjacent to Hatfield Aerodrome (site allocation covering 44.4ha for an estimated 1,700 residential units), Employment Area (EA7), District Centre and Residential (for housing development) designations.

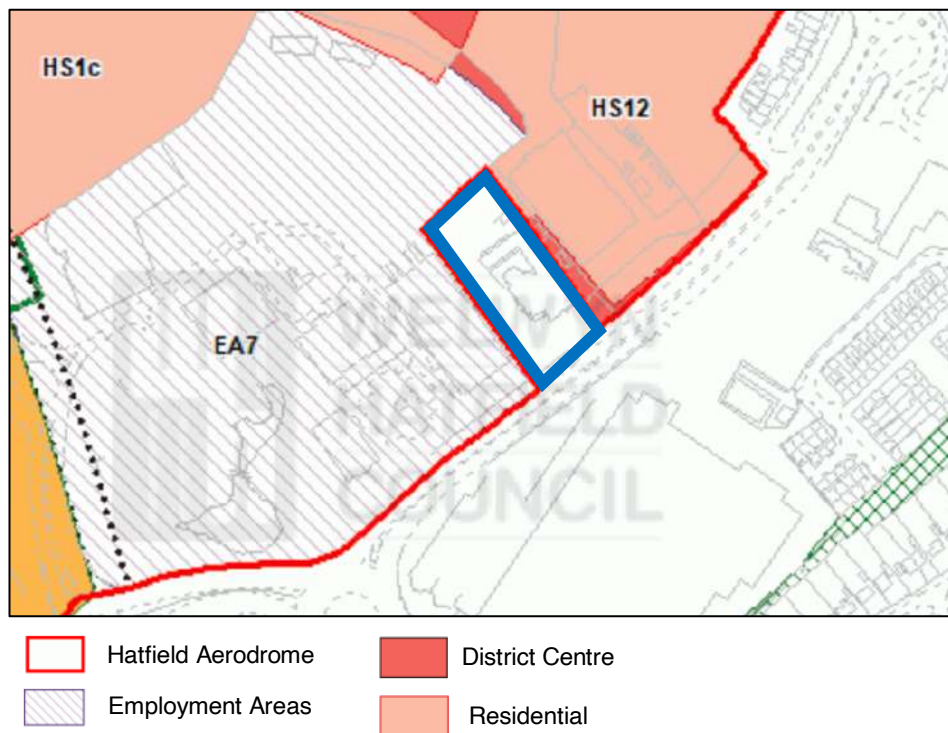


Figure 3: Extract from Welwyn Hatfield District Plan Policy Map (2005) with the Site location highlighted in blue

2.6 Figure 4 displays the Draft Local Plan Proposed Submission Policies Map (2016), showing the Site remains undesignated land. Parkhouse Court Neighbourhood Centre lies immediately east of the Site, as seen on Inset Map 19 of the emerging policies map. Bishop Square, Hatfield Employment Area sits adjacently to the west of the Site.



EA SADM10 Employment Areas

Figure 4: Extract from the Draft Local Plan Proposed Submission Policies Map (2016) outlining the Site in blue

2.7 The existing building on the Site is not statutorily or locally listed, nor is the Site within close proximity to listed buildings. There are a number of listed buildings within the wider area as shown in Figure 5 below. The Site is not located within a Conservation Area.

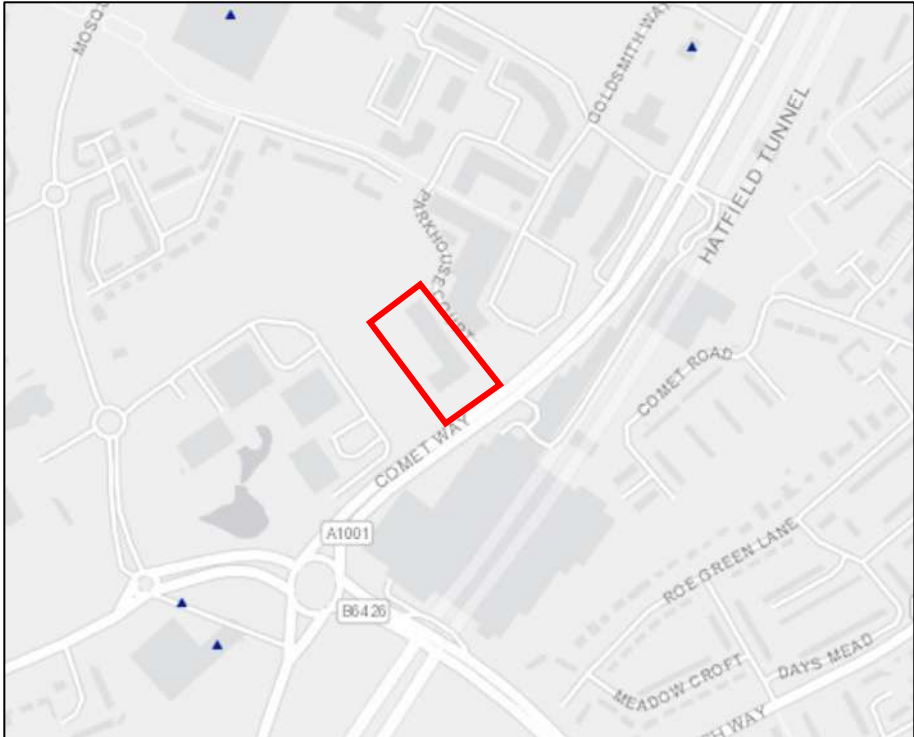


Figure 5: Extract from Historic England Map outlining the Site in red

2.8 The Site is located within Flood Zone 1 (“low risk”) as shown in Figure 6 below.

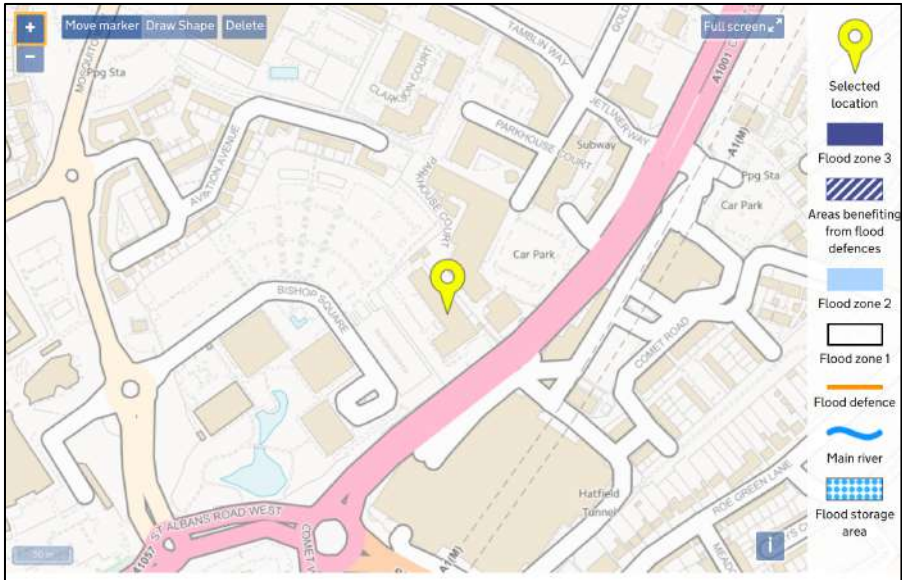


Figure 6: Extract from Flood Map for Planning

3.0 Planning History and Pre-Application

The Site

3.1 A desktop review of the Council's online planning database was undertaken. A summary of the Site's planning history is outlined below:

- Planning permission was granted in **June 2021** for the *"Change of use of existing vacant hotel into 53 room hostel and erection of further 40 units of accommodation in the car park for a temporary period of up to 3 years"* (ref: 6/2021/1164/FULL). The temporary use is to house residents from the existing YMCA in Welwyn Garden City, for a maximum of 3 years (i.e. June 2024), whilst the existing hostel is undergoing redevelopment.
- The hotel was subject to several applications relating to building extensions to accommodate additional rooms and facilities, which were granted between 1996 and 2017 (refs: 6/2016/2251/MAJ; S6/2013/2174/MA; S6/2010/2070/S73B; S6/2007/1492/MA; S6/2003/1658/FP; S6/2003/1038/FP; and S6/1996/0624/FP)

Neighbouring Sites of Relevance

3.2 Relevant planning history in the surrounding area is outlined below within Figure 7 showing the locations of the main planning applications.



Figure 7: Map showing the location of relevant planning applications in the surrounding area

- Former Volkswagen Van Centre:** Planning permission was granted on 24th March 2022 for the “demolition of existing buildings and construction of new building comprising 118 residential apartments, layout of parking areas, landscaping, electricity substation and ancillary development” (ref:6/2020/3222/MAJ). The scheme comprises a unit mix of 51x 1-bed and 67x 2-bed flats over 4-7 storeys, which is shown in Figure 8 below.



Figure 8: Former Volkswagen Van Centre Proposed Aerial View 2

- Former Hatfield Aerodrome:** Wider development of the Former Hatfield Aerodrome has been undertaken over the last 20 years. This has led to the development of the business park, mixed use development of district centre (Parkhouse Court) comprising retail and food and drink uses, the University of Hertfordshire campus, and approximately 430 residential units (refs: S6/2009/0891/MA; S6/2005/0675/DE; S6/2003/1137/OP; S6/1999/1064/OP).

3.3 Considering the above, the surrounding area has been subject to extensive mixed-use development over the last 20 years, with new commercial and residential development as well as a range of town centre amenities, services and transport improvements. As such, the proposed residential redevelopment of the former Beales Hotel would be complementary to the established uses in the surrounding area.

Pre-application Consultation

3.4 A pre-application meeting was held with the Council on 15th February 2021 to discuss the redevelopment proposal. The initial proposal was for the demolition of existing buildings and erection of 161 residential units with associated private and communal amenity space, car and cycle parking and landscaping. The proposed building was up to 9 storeys in height and had a car parking ratio of 0.64 spaces per unit. WHBC's pre-application response is at Appendix 1. In summary, officers supported the principle of development stating "*the principle of residential development is accepted*" but sought the following changes:

- A reduction in building heights to 5-7 storeys;
- An increase in the separation distance from neighbouring flats at Parkhouse Court from 21.4m to 23.2m;
- Ensure compliance with Government's technical housing space standards;
- Ensure that all windows facing out toward communal amenity areas or footways must have an appropriate landscaped buffer zones;
- An increase car parking provision;
- Provision of cycle parking in compliance with Council's standards; and
- Provision of affordable housing in line with the emerging Local Plan requirements.

3.5 In response to the pre-application advice, the scheme was reduced in height to 5-7 storeys and the north-eastern flank of the building was set further back from Parkhouse Court, at a distance of 23.2m metres. Other design changes include:

- All flats and bedroom size comply with the Government's Technical housing standards – nationally described space standard;
- Appropriate landscaped buffer for all windows facing toward communal areas are provided to prevent direct overlooking and privacy loss;
- Number of car parking spaces increased to 125 and one car club space (0.86 ratio); and
- Cycle parking provision will significantly exceed the ratio set in the Council's SPG.

4.0 Development Proposals

- 4.1 It is proposed to demolish all existing buildings and redevelop the Site to provide a high-quality residential development of 145 units with associated private and communal amenity space, car and cycle parking, refuse storage and landscaping.
- 4.2 A summary of the key characteristics of the residential development proposal is provided below:

Quantum

- 145 flats;
- 63x 1-bed; 52x 2-bed; and 30x 3-bed;

Scale and Height

- Transition in heights from 7 storeys in the east to 5 storeys in the west;
- The maximum height of the proposed building is 7 storeys;
- The massing is focused towards the eastern section, towards Parkhouse Court;

Design and Layout

- The proposal will improve the existing appearance of the Site by introducing a building of high design quality and creating a renewed sense of place along the street frontage;
- The development has 4 residential cores arranged around podium courtyards;
- The building line is stepped back from Parkhouse Court by 23.2 metres to ensure an appropriate separation distance;
- The majority of the flats achieves a multi or dual aspect (84.8%);
- All flats and bedroom size comply with the Government's Technical housing standards – nationally described space standard;

Amenity and Landscaping

- 2,063sqm of communal amenity space is provided within courtyard gardens at first floor and a roof terrace at fifth floor;
- Private amenity space will be provided for each unit in the form of balconies and terraces;
- The combined private and communal amenity space provision is equivalent to 47sqm per unit;

Parking and Servicing

- 125 parking spaces (including 15 wheelchair accessible bays, visitor spaces and a car club space);
- 13 electric vehicle charging parking spaces;
- 176 cycle parking spaces, including 8 visitor cycle parking spaces in the form of 4 'Sheffield' stands;

- 2 loading bays for deliveries;
- Refuse and recycling stores located at ground floor; and

Access

- Stopping up of the existing vehicle access and provision of a new vehicular access at the south-eastern corner of the Site from Comet Way, with dedicated shared footway/ cycleway.

5.0 Planning Policy and Guidance

5.1 Under Section 36(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.

5.2 The development plan comprises the Welwyn Hatfield District Plan (2005) – Saved Policies (2008)
Adopted Local Plan Policies

5.3 The relevant policies within the Local Plan are as follows:

- SD1 (Sustainable Development);
- GBSP2 (Towns and Specified Settlements);
- R1 (Maximising the use of Previously Developed 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);
- 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);
- D9 (Access and Design for People with Disabilities);
- D10 (Public Art);
- D11 (Design Statements);
- H1 (New Housing Development);
- H2 (Location of Windfall Residential Development);
- H6 (Densities);
- H7 (Affordable Housing);
- H10 (Accessible Housing); and
- OS3 (Play Space and Open Space in Residential Development).

Other Material Considerations

5.4 Other material considerations include:

- National Planning Policy Framework (2021) (“NPPF”);
- National Planning Practice Guidance (2019);
- Draft Local Plan Proposed Submission Document (2016).

- Planning for the Future White Paper (2020);
- Supplementary Design Guidance (2005);
- Parking Standards SPD (2004);
- Interim Car Parking and Garage Size Policy (2014);
- Planning Obligations SPD (2012); and

Draft Local Plan Policies

5.5 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);
- SADM1 (Windfall Development);
- SADM2 (Highway Network and Safety);
- SADM3 (Sustainable Travel for All);
- SADM11 (Amenity and Layout);
- SADM12 (Parking, Servicing and Refuse);
- SADM13 (Sustainability Requirements);
- SADM14 (Flood Risk and Service Water Management);
- SADM15 (Heritage);
- SADM16 (Ecology and Landscape); and
- SADM18 (Environmental Pollution).

6.0 Planning Assessment

- 6.1 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.
- 6.2 The key planning considerations are as follows:
- (a) Principle of development;
 - (b) Housing tenure and mix;
 - (c) Design;
 - (d) Townscape and heritage assets;
 - (e) Residential amenity;
 - (f) Neighbouring amenity;
 - (g) Energy and sustainability;
 - (h) Highways, access and parking;
 - (i) Landscaping, biodiversity and trees;
 - (j) Flood risk and drainage; and
 - (k) Other environmental considerations.

Principle of Development

- 6.3 **Part 5** of the NPPF sets out the government's objective to boost the supply of homes, encouraging a variety of land to come forward where it is needed. **Paragraph 69** particularly emphasises the important contribution that small and medium sites have to meeting local housing requirements. **Part 11** highlights the importance of promoting the effective use of land in meeting the need for homes, whilst safeguarding and improving the environment. **Paragraph 120 of the NPPF** stipulates that planning policies and decisions should give substantial weight to the value of using suitable brownfield land within settlements for homes and promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing. **Paragraph 185 of the NPPF** outlines that planning decisions should ensure that new development is appropriate for its location. **Paragraph 120** supports developments on under-utilised land and buildings, especially if this would help meet the identified housing need where land supply is constrained and available sites could be more effectively used.
- 6.4 At **Paragraph 4.5** and **Policy GBPS2** (Towns and Specified Settlements) of the Local Plan (2005), one of Plan's main objectives is to concentrate development into the district's two main towns, including Hatfield. **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.

- 6.5 **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 15,200 dwellings over the plan period.
- 6.6 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.”*
- 6.7 It is noted in the latest Annual Monitoring Report (2019-20) that the borough’s housing land supply is 2.58 years. In terms of housing delivery, the latest Housing Delivery Test figure (2021) reports that only 66% of the borough’s annual housing requirement has been delivered. In this housing supply and delivery context, WHBC’s policies relating to housing are out of date because the Council. This shows that there is a critical need for housing to be delivered in the borough.

Scheme Assessment

- 6.8 The Site is located on previously developed land within the sustainable settlement of Hatfield, a location where the Local Plan prioritises new development. The value and importance of developing previously developed land is recognised at both national and local level, as identified above, giving substantial weight in favour of the proposed reuse of suitable previously developed land for the delivery of much-needed housing. Additionally, the Site benefits from a range of amenities, services, and facilities both within the neighbouring Parkhouse Court development and more widely in Hatfield. The Site is well-connected to public transport with numerous bus stops within walking distance providing quick direct access to Hatfield Railway Station as previously stated in detail in paragraph 2.4 and also specified in the Transport Statement under Section 2 “Existing Site and Transport Conditions.”

- 6.9 The former hotel operators have vacated the existing building due to declining trade and it is in temporary use as a YMCA hostel whilst the Welwyn Garden City YMCA is refurbished (with the temporary permission expiring in June 2024). Once the refurbishment is complete, the building will once again be vacant. The proposal would deliver a beneficial use.
- 6.10 As stated previously, the Council is delivering a significant shortfall of housing, with the latest 5 year land supply being 2.58 years and having had failed the Housing Delivery Test in 2021 by delivering only 66% of their housing target. The proposal will therefore make a notable contribution to a borough in critical need for housing.
- 6.11 Draft Policy SP2 of the Submission Draft Local Plan (2016) sets out the housing target of 12,000 dwellings over the plan period. However, the Inspector has advised that the draft plan cannot be found sound because the 12,000 figure does not meet the Objectively Assessed Need (“OAN”) for housing, which is considerably higher, at 15,200 dwellings. The Inspector has advised that Green Belt release will be necessary to meet this housing target. Delivery of housing on sites such as this former hotel will contribute towards meeting the higher housing target and reduce the need for Green Belt release.
- 6.12 Hatfield town is undergoing change, with a significant amount of development and regeneration in the area. Recently, in March 2022, planning permission was granted for the redevelopment of the Volkswagen Garage approximately 275m to the north of the Site on Comet Way and construction of 118 residential dwellings up to a height of 7 storeys. This development responds to its evolving context to optimise the quantum of residential development, on a previously developed site in a suitable and sustainable location. The Site is subject to no planning designations and meets all of the criteria in emerging Policy SADM1’s for windfall residential development. The proposal will make a significant contribution to WHBC’s growing housing targets.
- 6.13 The principle of redeveloping the former hotel to deliver residential units is acceptable and supported in accordance with the NPPF and adopted Policies SD1, H2, R1 and GBSP2 and draft Policies SP2, SP3 and SADM1. The WHBC pre-application response (Appendix 1) confirms that the principle of windfall residential development is acceptable.

Housing Tenure and Mix

- 6.14 The adopted Local Plan targets 30% affordable housing provision within development proposals such as this (**Policy H7** Affordable Housing). WHBC’s Planning Obligations SPD is relevant to the application of Policy H7. The SPD recognises that affordable housing contributions attributed to a scheme can affect the financial viability of a development proposal. In these circumstances, an applicant for planning permission would be expected to submit a viability appraisal and pay for the Council to have this appraisal independently reviewed and verified. The draft Local Plan sets an affordable housing target of 25% (**Policy SP7** Type and Mix of Housing).

- 6.15 The Local Plan expects new development to include 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.
- 6.16 **Policy SP7** (Type and Mix of Housing) of the submitted draft Local Plan requires a range of housing to be delivered with reference to WHBC’s latest evidence of need, including accessible housing.
- 6.17 The most recent evidence on local housing need is the Technical OAN Paper (2019), produced by Turley in connection with the draft Local Plan Examination. The table below sets out the implied size of housing required between 2013 to 2032:

	1 bed	2 beds	3 beds	4+ beds
Proportion of households requiring...	14%	23%	41%	23%

Scheme Assessment

- 6.18 A variety of unit sizes are proposed, including 63 x 1-bed (43%); 52 x 2-bed (36%); and 30 x3-bed (21%).
- 6.19 The need identified in the OAN Paper should not be applied rigidly. 57% of the total number of units are proposed as 2- and 3-bed units, which broadly accords with required housing mix. This is deemed an appropriate proportion given that flatted developments are usually more appropriate to accommodate 1- and 2-bed units, especially in an area with similar smaller households and sustainable locations with immediate access to shops and services, such as the Site.
- 6.20 15 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).
- 6.21 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 proposals comply with the adopted and emerging
- 6.22 A Viability Report/Assessment has been prepared by Kempton Karr Croft concluding the development will not be viable to provide affordable housing.

Design

- 6.23 **Paragraph 199** of the NPPF gives support for development that makes efficient use of land. **Paragraph 125** 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 125 a)** 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.
- 6.24 **Paragraph 126** 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 130**, 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. *(b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
 - c. *(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 wellbeing, 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.”*
- 6.25 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).
- 6.26 **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.’

- 6.27 **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.

Scheme Assessment

- 6.28 The existing 2-storey former hotel building has limited architectural, historical and visual interest.
- 6.29 In the surrounding area, Comet Way consists of a mixture of commercial, retail and residential development, which includes several buildings varying in ages, architectural styles and scales. Parkhouse Court, a mixed used development, containing Harpsfield Hall, Aldi, restaurants, businesses, Travelodge, residential dwellings and car parking is immediately adjacent the Site. Generally, there is a lack of distinct architectural language in the area.
- 6.30 The proposed scheme significantly improves the visual appearance of the Site and enhances the relationship with the surrounding area by introducing a higher quality building with associated planting and landscaping providing a more active, secure, safe, street-friendly frontage.
- 6.31 The opportunity is taken to use spaces available for soft landscaping and planting at ground level, first floor and fifth floor to provide a sensitive and sustainable approach to the new development. The spaces between the building at first floor level, have been designed as communal courtyards, which will accommodate intensive planting and tree planters with an overall naturalistic feel. They have been inclusively designed to be accessible for all. A communal roof garden at fifth floor level is also proposed as part of the scheme, incorporating soft landscaping and planting.
- 6.32 The proposed development has been designed with careful regard to its context. The scheme is designed around a repetitive block design to equally spread the unit mix evenly throughout the proposal.
- 6.33 With regards to massing, the proposed building ranges between 5 and 7 storeys, which is not incongruous with the existing building heights and townscape for this part of Hatfield. The design breaks up the building to provide amenity and sunlight and form and shifts the bulk of the proposed buildings towards less-sensitive boundaries, including retaining a 21+ (23.2m) metre separation distance between the flank of the building and that of neighbouring Parkhouse Court to the northeast. It is considered that the proposal is a significant improvement to the existing built form in terms of siting, layout and overall design.
- 6.34 In terms of the architectural quality of the building, the proposal improved the aesthetic quality of the Site, introducing well designed architecture which is complemented by extensive landscaping. The design is reflective of locally distinct architecture and will contribute to an enhanced sense of place for the future of Hatfield. The material palette has been carefully considered to create a subtle, mature character for the proposal, blending gracefully with the street scene.
- 6.35 The proposed development will seek to incorporate cues from the wider area and predominantly utilise external brick. Further information on design is found within the accompanying Design and Access Statement.
- 6.36 All proposed units meet or exceed space standards and future residents would benefit from ample amenity space provision. The number of dual aspect units have been maximised to ensure favourable

outlook and levels of daylight and sunlight would be achieved. The proposals include appropriate parking and servicing provision to ensure that the development would be it for purpose and support a high standard of amenity for future residents.

- 6.37 The proposal therefore complies fully with the design objectives in the NPPF and Local Policies D1, D2, D4, D6, H6 and Draft Policy SP9.

Townscape & Heritage Assets

- 6.38 **Paragraph 199** 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. Paragraph 200 to 202 stipulates how developments should demonstrate that where development will lead to a substantial or less than substantial harm to a heritage asset, the harm should be weighed against the public benefits of the proposal including securing its optimum viable use.
- 6.39 **Policy SP1** (Delivering Sustainable Development) of the draft Local Plan seeks to protect and enhance heritage assets, with **Policy SADM15** (Heritage) setting out that proposals should respect the setting of heritage assets in terms of design, scale, materials and impact on key views.

Scheme Assessment

- 6.40 The application is supported by a Heritage, Townscape and Visual Impact Assessment, produced by Bidwells. Section 5 of the Heritage Assessment assesses the Site and its current contribution to the surrounding area. Overall, the building does not meaningfully respond to the road frontage with the surrounding area comprising late twentieth century in character with an inconsistent architectural language.
- 6.41 Section 6 of the Heritage Assessment identifies heritage assets that have the potential to be affected by the development proposal and assesses the contribution of the Site (both in existing and proposed conditions) to the setting of each the identified assets. The assets are mapped out in relation to the Site location where it can be seen no heritage assets are within close proximity. The existing Site is found to have a neutral effect to the setting and significance of all of the identified heritage assets, with the exception of Hatfield House, which the Site a negligible adverse effect on.
- 6.42 The report assesses verified views to conclude that the proposal would have a neutral impact on the setting and significance of all assessed heritage assets. This includes Hatfield House Grade I Listed Building and Registered Park and Garden. The proposal would not have a perceptible impact on views from the house and gardens due to the extreme distance between the Site and the Listed Building, intervening development and tree lines, and the position of the Site below the horizon line (Paragraph 9.12-14, and 10.5, Heritage Assessment).
- 6.43 The Heritage Assessment adds that the proposals would result in an improvement in the existing appearance of the Site. The proposals, through high quality design, use of a contextual material palette, and art-deco references, have the potential to provide a positive building and re-assertion of a sense of place along Comet Way.

6.44 Overall, the Heritage Assessment concludes:

“In terms of the impact on listed buildings, the proposals are therefore considered to have paid due regard to the desirable objective of preserving the setting of the listed buildings in accordance with Section 66 of the 1990 Act. In causing no harm to the significance of the listed buildings the relevant policies of the NPPF are satisfied, in addition to local heritage policies.” (Paragraph 10.6)

Residential Amenity

6.45 **Paragraph 130 f)** of the NPPF states that development should promote health and well-being and achieve a high standard of amenity for existing and future users.

6.46 Draft **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.

6.47 Draft **Policy SP9** (Place-making and High Quality Design) seeks an appropriate amount of public open space

Scheme Assessment

Internal Standards

6.48 A high standard of future residential amenity is provided by the proposals. All units meet or exceed Nationally Described space standards and ensure good levels of sunlight and daylight are received. The development layout seeks to maximise the number of dual aspect units. As seen from the accompanying Design and Access Statement, 84.8% of the units will be dual or multi aspect ensuring good levels of daylight and sunlight and promoting passive ventilation throughout the flats.

Amenity Space

6.49 Amenity spaces are provided within the scheme to support a high standard of living for future occupants including private amenity space, a communal roof terrace, and communal courtyards at ground floor level. A schedule of amenity areas being provided is shown in Table 1 below:

Amenity Type	Area m ²
Private amenity space (total)	4,853.3sqm
Residents’ communal amenity space (roof terrace/courtyards)	2,063.6sqm
Average combined amenity space per unit (private and communal)	47.40sqm

Table 1: Amenity Space Provision Breakdown

- 6.50 Useable private amenity space is proposed for all units in the form of balconies or terraces. The landscaping proposals have been developed to create a sense of privacy and buffer between the residential units, private amenity spaces and communal amenity areas. The landscaping seeks to deliver aesthetically inviting areas for the future residents to enjoy. All residents will have access to the communal courtyards at first floor level and the fifth floor roof garden can be accessed via Cores A and B. Further details on the landscaping strategy are provided below.

Daylight and Sunlight: Light Within the Development

- 6.51 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, concluding these levels to be acceptable.

Noise

- 6.52 A Noise 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 suitable glazing and acoustically treated trickle ventilation.

- 6.53 In terms of outdoor noise levels, many of the proposed apartments will have access to small balconies and communal courtyards and a roof terrace. The balconies overlooking south and north of the development will have incidental noise levels marginally above WHO guidance, however, all residents will have access to the communal amenity areas at ground and roof levels which will benefit from sufficient screening provided by the building structure that WHO-compliant noise levels will prevail. This will ensure all residents have access to quieter amenity spaces if they prefer.

Air Quality

- 6.54 The Air Quality Assessment, prepared by Air Pollution Services, considers the potential air quality impacts of the proposed development upon the local area and concludes it is unlikely to delay compliance with the limited values or WHO guidelines in Hatfield. Air quality for future residents have also been assessed, predicting concentrations are below the Air Quality Objectives (AQOs) and limit values. Therefore, it is not necessary to include any further mitigations and the air quality impacts of the proposed development will be ‘not significant’.

Conclusion

- 6.55 To conclude on residential amenity, the proposals will provide a high standard of amenity for future occupants. Daylight, sunlight, noise, and air quality considerations have been fully assessed and found to be in accordance with NPPF guidance and local policies.

Neighbouring Amenity

Scheme Assessment

Privacy

6.56 Sensitive neighbouring receptors to the development are limited to the flats at Parkhouse Court, which neighbours the Site to the northeast. The amenity of Parkhouse Court has been considered through the design process. As recommended by officers at pre-application stage, a separation distance of 23.2m, increased from 21.4m during the pre-application stage, is retained between Parkhouse Court. This is considered appropriate for the Site's urban location.

6.57 Appropriate separation distances are maintained between facing units within the different cores of the proposed building. The proposed balconies for the apartment blocks will be recessed to increase privacy and comprise simple steel balustrades which will provide some degree of obscuring views downwards from balconies towards Parkhouse Court.

Daylight and Sunlight

6.58 In the Daylight and Sunlight Report, Anstey Horne have assessed the daylight and sunlight availability to neighbouring properties to the east of the Site (Parkhouse Court). The assessment concludes the levels of daylight and sunlight are acceptable.

Energy and Sustainability

6.59 **Paragraph 152** 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.

6.60 **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

6.61 The application is supported by an Energy and Sustainability Statement, prepared by Love Design Studio, which outlines the scheme's approach to energy savings and sustainable development.

6.62 The scheme's approach to energy savings is in line with Policies SP1, SP10 and SADM13 of WHBC's draft Local Plan.

6.63 The scheme utilises window reveals, solar control glazing and internal blinds to reduce the requirement for active cooling. The dwellings will also be capable of utilising passive opening methods of ventilation with the dwellings also to be provided with mechanical extract ventilation.

6.64 The measures proposed to promote an energy efficient development include:

- Building orientation that suits daylight and sunlight access;
- Being airtight to reduce draughts and heat-loss;
- A well-insulated building fabric shell;
- Low-energy ventilation extract;
- 100% efficient lighting; and

- Dual aspect spaces to improve cross-ventilation and passive solar shade solutions.

- 6.65 All these measures are to reduce the demand for energy. The proposal also demonstrates how to cleanly reduce CO₂ emissions through appropriate heating infrastructure. Additionally, the Energy and Sustainability Statement demonstrates how opportunities are taken to produce and use renewable energy onsite utilising Air Source Heat Pump Water Heaters and Photovoltaic Solar Panels.
- 6.66 The energy strategy will result in a significant on-site cumulative CO₂ reduction of 37%, ensuring the new building is highly sustainable and will minimise resource usage and carbon emissions.
- 6.67 The scheme considers the proposed development against the Welwyn Hatfield Sustainability Checklist (SPG), assessing and demonstrating the scheme's sustainability credentials against the specified categories.
- 6.68 The report concludes the proposed development adopts opportunities within its design and construction, maximising the energy efficiency of the scheme to minimise the environmental impact. This is demonstrated by following the energy hierarchy; Use less energy (Be Lean), Supply energy efficiently (Be clean) and use Renewable and low carbon energy (Be Green). The proposed development meets national and local planning policy targets.

Highways, Access and Parking

- 6.69 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 105**).
- 6.70 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 113**).
- 6.71 The three key transport tests are set out in **Paragraph 110**:
- “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.”*
- 6.72 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 111**).
- 6.73 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.

- 6.74 The Parking SPG (2004) sets out parking requirements depending on which Zone the site is located within. The Site is located just outside Zone 3 and as such the parking requirements are 1.25 space per 1-bed dwelling, 1.5 space per 2-bed dwelling, 2.25 space per 3-bed dwelling, 3 spaces per 4-bed dwelling, and 1 long term cycle space per unit (if no storage is provided). 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.
- 6.75 In addition to car parking, one long term cycle parking space is required for each flat.
- 6.76 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) asks that development is designed to be legible, permeable and well connected with pedestrian travel prioritised.

Scheme Assessment

- 6.77 A Transport Assessment, produced by RPS, is submitted in support of the application. The Transport Assessment identifies the walking, cycling and public transport accessibility of the Site, as well as accessibility to local facilities. The assessment demonstrates the Site is accessible via foot or cycle to key facilities, minimising the need to travel by private car. This is reflected in the low car ownership levels of existing residents in the area, with an average of 0.67 car ownership per residential. Overall, the accessible location of the Site provides residents with a realistic choice of active and sustainable travel modes for day-to-day requirements.

Access

- 6.78 The existing access will be stopped up and the new vehicle access will be provided at the south-eastern corner of the Site via A1001 Comet Way, allowing connection efficiently to the internal car park access road located at the eastern Site boundary. The proposed access arrangements are shown in Appendix 6 of the Transport Statement.
- 6.79 The proposed access arrangement has been designed with the following matters addressed:
- Vehicle access will be 6m wide as it enters the Site;
 - Junction radii are provided at 6m to accommodate the swept path of the largest vehicle that accesses the Site, which will be a large refuse vehicle; and
 - A visibility splay in excess of 2.4m x 160m can be achieved to the right of the proposed access.

- 6.80 The proposed vehicle access will also accommodate pedestrian and cycle movements to the Site. A 2m wide footway will be provided on the south western side of the access. Cycle access to the Site will be via the proposed vehicular access arrangement.
- 6.81 Servicing and delivery vehicles will access the Site via the proposed vehicle access arrangement. Refuse vehicles will access the bin transfer area via eastern access road, and a turning head area is provided in the vicinity of the entrance to the car park to allow the refuse vehicle to existing the Site in forward gear.
- 6.82 Two separate car parking bays for delivery vehicles are allocated to the western side of the proposed vehicular access close to the main entrance to the residential development, which has been designed to accommodate two large delivery vans or a larger delivery vehicle such as pantechnicons. Delivery vehicles will also use the turning head to exit the Site in forward gear the same basis as the refuse vehicle.
- 6.83 A swept path analysis demonstrating the workability of the access proposals is provided at Appendix 7 of the Transport Statement.

Trip Assessment

- 6.84 Vehicle trip assessment of the proposals is contained in Section 5 of the Transport Statement setting out trip generation of the existing lawful use (hotel) and the proposed residential flats.
- 6.85 Overall, the proposed residential flats are predicted to result in a slight net increase above the established lawful hotel use in the morning and evening peak hours, generating 1 vehicle trip approximately every two minutes during these peak hours. As a net impact, this totals one additional trip approximately every 5 minutes in the morning peak hour and one additional trip approximately every 9 minutes in the evening peak hour above the existing Hotel use.
- 6.86 Overall, the proposal will result in 49 additional daily movements.
- 6.87 The increase level predicted will be imperceptible to other road users on Comet Way and significantly below daily variations in traffic flow. Therefore, the proposed development will fall far short of having a 'severe' impact on the road network (with reference to NPPF Paragraph 110 and 111), thus the proposal is acceptable in highways terms, with safe access provided to the Site and no adverse impact expected on the local road network.

Parking

- 6.88 Local parking standards are provided within the Welwyn Hatfield Borough Council Parking Standards SPG (2004). The Site is located outside zones 1 and 2, implying a relatively high target level of car parking provision, however the SPG is dated (being 18 years since its adoption) and the zonal maps show the majority of development surrounding the Site wasn't yet built at the time of preparing these maps.
- 6.89 The SPG sets out maximum standards, not minimum, which are to be treated as guidelines, as stated in the Interim Policy for Car Parking Standards and Garage Sizes (2014). As such, car parking provision is to be decided on a case-by-case basis.

- 6.90 The proposed development provides 125 car parking spaces, which equates to ratio of 0.86 per unit, which is comparable to the approved Volkswagen scheme parking ratio of 0.85. The car parking is provided at undercroft level (with the exception of disabled bays at the front of the building) and ensure that parking is not visually prominent within the street scene. The parking provision reflects the Site's sustainable location in proximity to local facilities and bus services and is within easy cycle distance of Hatfield rail station, as specified within the Transport Statement under Section 2 "Existing Site and Transport Conditions". Additionally, the car parking provision exceeds the likely car ownership levels for flatted developments in the area and will not result in any overspill parking impact on the local streets within walking distance of the Site, as concluded in the Transport Statement (paragraph 6.4). The parking provision includes 15 disabled parking spaces, one car club space, and 13 electric vehicle charging parking spaces, as set out within the Transport Statement (paragraph 4.33). The remaining parking spaces will be constructed with passive provision, so that they can be retrofitted with electric vehicle charging points of the spaces are equipped with Electric Vehicle Charging Points.
- 6.91 One car club space is proposed, which according to CoMo (a charity supporting the introduction of sustainable transport modes) have calculated that for every car club vehicle, it leads to a removal of 10.5 private cars from the road network (thus requiring 10 fewer parking spaces).
- 6.92 176 cycle parking spaces are proposed to be provided, including 8 visitor cycle parking spaces in the form of 4 'Sheffield' stands located near the main entrance to the residential development. This is in excess of the cycle parking standard required, and will encourage future residents to cycle rather than use private vehicles.

Framework Travel Plan

- 6.93 A Framework Travel Plan, developed by RPS, 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, with an emphasis on reducing reliance on single occupancy car journeys. These measures include:
- Appointment and funding of an appropriated skilled Travel Plan Coordinator (TPC). The TPC will be responsible for the implementation, administration and monitoring of the Travel Plan. Their primary responsibilities are:
 - Promote and guide the Travel Plan;
 - Retain awareness of local, regional and national transport policies and programmes;
 - Assemble and maintain current public transport timetable and fare information and ensure this is made readily available to residents;
 - Identify public transport fare discount opportunities;
 - Set SMART targets for the percentages of trips by each mode of travel;
 - Undertake baseline TRIOCS compliant survey to obtain information on residents' travel habits and compare these to modal split targets identified from the baseline surveys.

- Funding the implementation of the Travel Plan in accordance with the actions and timetables set out within the Framework Travel Plan.
 - Marketing and promotion of the Travel Plan to inform the residents;
- 6.94 The Travel Plan proposes the potential modal shift outcomes linked to appropriate measures aimed at encouraging more sustainable travel.
- 6.95 The Site is located in a 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, Biodiversity and Trees

- 6.96 **Paragraph 130** 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 174** says that planning decisions should enhance the natural environment by minimising impacts on and providing net gains for biodiversity.
- 6.97 **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.
- 6.98 **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

- 6.99 A detailed Landscape Strategy and Landscape Plans have been prepared by Guarda Landscape, alongside the architectural proposals providing a coherent design. The landscaping has been focussed on the main external communal spaces in the form of courtyards and roof terraces at ground,

first and fifth floor level. The landscaping proposes a sensitive approach to inform and enhance a more sustainable design.

- 6.100 The overall landscaping design takes some inspiration from the aeronautic heritage of the area. The use of a diagonal design on the ground floor hard surface reflects this heritage whilst visually widening the space available.
- 6.101 Soft landscaping in the form of intensive native planting, tree and hedge planting, and seating areas will be incorporated into the allocated communal amenity space. Additionally, the boundary treatment is proposed to enhance the north, eastern and southern boundary with hedges and timber fencing to improve the visual aesthetic appearance and privacy for future residents.
- 6.102 A Local Area of Play (LAP) is being proposed at first floor level in line with the Open Space Requirements.
- 6.103 Overall, the scheme will benefit from the introduction of outdoor play facilities, amenity areas and planting as well as seating throughout. The planting provides brightly coloured and green areas and provide year-round interest, amenity and biodiversity value.

Ecology

- 6.104 An Ecological Impact Assessment (including biodiversity net gain calculation), produced by Green Environmental Consultants reports upon a Preliminary Ecological Appraisal (PEA) and a Preliminary Bat Roost Assessment (PBRA). 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 also invertebrate boxes.
- 6.105 In terms of biodiversity net gain, the proposal includes vegetated areas on three levels, comprising 1,300sqm of new planting which will attract pollinating insects and other invertebrates, which will produce foraging opportunities for birds and bats. Wildflowers are also being proposed, which will further enhance the biodiversity. The proposal involves the planting of 28 new trees to mitigate against the loss of trees to be removed.
- 6.106 An exceptionally high biodiversity net gain of 478.96% will be achieved, representing a significant improvement to the existing Site conditions.

Trees

- 6.107 The scheme's arboricultural consultant David Clarke has surveyed the trees at the Site and prepared an Arboricultural Impact Assessment, Arboricultural Method Statement and Tree Protection Plan in support of the application.
- 6.108 The Arboricultural Impact Assessment focuses on 8 individual trees and 9 groups of trees which are potentially affected by the proposal. The Assessment notes there are no trees on the Site which are protected by a Tree Preservation Order (TPO). The trees are generally located to the Site boundaries.
- 6.109 Some trees are needing to be removed due to the proposed development, including 4 individual trees, 4 group of trees and 1 tree within a group of trees and the remnant of 1 group will need to be removed. The majority of these trees are low quality or unremarkable "C" category tree. Some existing trees

have also been damaged by the use or maintenance of the Site. Two of the trees to be removed are of moderate quality 'B' Category trees which has some potential significance and is discussed in further detail within the Arboricultural Impact Assessment.

- 6.110 The proposed development involves the planting of 28 new trees (10 small, 9 medium and 9 large) which will fully mitigate for the necessary tree removals and represent an improvement in visual amenity and biodiversity terms.
- 6.111 Overall, the removal of the trees is unavoidable within the proposed development and the loss of trees must be balanced against their quality (none are Category A), the number and quality of proposed trees and the benefits arising from the scheme. Therefore, it is assessed that the removal of these trees will not have a substantial impact on the visual amenity of the area or its enjoyment by the general public.

Conclusion

- 6.112 The proposed development introduces a soft landscaping scheme, significantly improving existing conditions in terms of biodiversity and ecological opportunities to contribute to a biodiversity net gain of 478.96%. Overall, the proposal 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

- 6.113 **Paragraph 167** of the NPPF seeks to ensure that development proposals do not increase flood risk elsewhere. **Paragraph 169** 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.”*

- 6.114 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.”

- 6.115 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

- 6.116 While the Site is located in Flood Zone 1, at low risk of fluvial flooding, a Flood Risk Assessment and SuDS Report has been prepared by EAS to investigate all flood sources and consider any mitigation measures where necessary.
- 6.117 A CCTV drainage survey was undertaken concluding the existing Site drains via a series of soakaways. Infiltration tests were undertaken in February 2022, with results not favouring the traditional deep soakaway devices. In addition, the Site layout is not conducive to the use of soakaways in line with Building Regulations or CIRIA Guidance. The existing drainage network would be grubbed and/or removed as required to facilitate the construction. EAS have therefore concluded that infiltration would be unsuitable and an attenuation strategy is proposed. The attenuation tank has been sized at 190sqm X 1.32m deep to accommodate roof surface water runoff and runoff from the surrounding footpaths and vehicular access.
- 6.118 There are no watercourses within the vicinity of the Site, therefore an outfall to the Thames Water network has been explored. The only adopted sewers within the immediate vicinity of the Site are foul sewers. Thames Water have been consulted with regards to a suitable outfall location and an in-principle agreement to connect to an adopted surface water sewer circa. 160m northeast of the Site has been negotiated based on a pumped outfall rate of 3.5l/s, as set out in Appendix H "SuDS Sketch" of the Flood Risk Assessment and SuDS Report. A new circa. 160m section of surface water sewer will thus need to be constructed within the verge/footpath of Comet Way. The Applicant is agreeable to providing this piece of infrastructure.
- 6.119 The proposals will not increase flood risk onsite or elsewhere and the necessary mitigation measures have been outlined in the Flood Risk Assessment and SuDS report. The proposed development is considered to be suitably located on the Site and there should be no reason on flood risk or drainage grounds as to why permission should not be granted.

Other Environmental Considerations

Ground Conditions

- 6.120 A Phase I Geoenvironmental Assessment, produced by Symbiotic Solutions, is submitted in support of the application. The report identified the potential for significant contamination is considered to be generally relatively low, although precautionary low / moderate risks have been identified to human health and buried services associated with potential airfield and works usages off-site to the north-west and north-east. Otherwise, the development scenario largely mitigates any potential contamination linkages.
- 6.121 Overall, it is considered that the Site is very likely to be suitable for the proposed residential development subject to considerations stated within the report. No further intrusive contamination surveys are required.

7.0 Economic Statement

7.1 The Economic Statement has been prepared to determine the estimated economic effects of the proposed residential development of 145 units at Former Beales Hotel. It assesses the economic impacts, with a focus predominantly on the level and effects of employment opportunities created through construction and operation but also accounting for other effects, such as spending power of new residents.

Methodology

7.2 The assessment has been broadly based on guidance and methodology applies in the Homes and Communities Agency Additionality Guide (HCA, 2014). It has not been strictly adopted but has provided a template for the assessment undertaken. The outcome has enabled an objective approach to determine estimated economic benefits from the proposed development.

Baseline

7.3 The baseline position is the Site as vacant (on the basis that the current YMCA occupation is temporary and thus would not provide any lasting benefit). It therefore provides nil economic benefit to the area.

Calculating Employment

7.4 The calculation of employment opportunities will consider key components. These are:

- **Gross direct jobs** which is an estimate of the total effect of the proposal on jobs;
- **Leakage** accounts for the level of outputs that benefit those outside of the intervention's target area or group. In this instance of calculating employment, it would relate to the level of people from outside the administrative boundary of Welwyn Hatfield who will occupy job roles created by the proposed development;
- **Displacement** accounts for the level of the proposed development's outcomes accounted for by reduced outcomes elsewhere in the target area or group. Within the calculations in this report, this would relate to how employing people into roles created by the proposed development could detract from employment levels elsewhere in the area; and
- **Economic multiplier effects** accounts for further economic activity that takes place as a result of the direct economic impact of job generation, accounting for effects associated with additional local income and local supplier purchases.

7.5 When calculating employment opportunities generated through construction, figures will be given that are representative of both the 'direct' jobs created on-site, as well as a total figure which considers jobs created indirectly through economic activity that occurs as a result of the jobs created directly.

7.6 A similar approach will be adopted to calculate the level of employment that will be generated through the operation phase of the project once construction has been completed.

Variables for Calculating Employment

7.7 The key components listed above are used to calculate the employment effects of the area. Against each component a factor is applied to account for either effectual gain or loss, dependent on the

component's definition. These are explained below in their constituent roles of either construction employment or operational employment.

Construction Employment

- 7.8 A **leakage** discount of 30% is considered appropriate given that the majority (70%) of construction workers are likely to be local contractors who reside within the administrative boundary of Welwyn Hatfield. The 30% of workers is likely to be made up of specialist contractors, people who just don't live within the area and temporary workers who are required as and when and thus typically move around a wider area for work. This figure is underpinned by the Site's location in Welwyn Hatfield as well as the developer's intention to priorities employing local contractors.
- 7.9 A **displacement** discount of 25% is considered a reasonable representation of the proposed development's construction attracting works from other projects. That's not as a result of competition but through the organic process of other construction jobs coming to a project-life end. There will be overlap between projects therefore, whereby contractors will be working on one or more. Given the proposed development will be one of the borough's biggest construction projects over a two-year period, it will account for an aggregate number of workers who will be, or have been previously, working on multiple, smaller jobs.
- 7.10 A multiplier effect for construction employment is a factor of 2.7. This multiplier is cited in the Additionality Guide (2014) to be a representative multiplier for the construction industry. It is based on econometric studies by Oxford Economics.

Spending

- 7.11 The assessment has also looked at the amount of money the new population will bring to the area and the potential gross expenditure that would be generated. This is achieved by using ONS and other data.

Economic Benefits

- 7.12 This section provides an overview of the estimated economic effects that will be generated by the proposed development.

Employment Impact

Construction Jobs

- 7.13 The proposal will generate temporary local jobs during construction. It is estimated that a total of 185 net direct and indirect jobs will be created per annum.
- 7.14 The estimated number of net direct and indirect jobs is calculated on the basis of gross construction jobs generated with key components of leakage, displacement and the multiplier effect factored in. Table 2 shows the estimated job breakdown incorporating these factors.
- 7.15 174 gross construction jobs will be created from the construction phase. This figure is based on research by Nathaniel Lichfield Planning for the National Housing Federation (2015), which sought to quantify the number of jobs created by house building in the UK. It found that an average of 1.2 full time jobs per dwelling built are created during construction.

- 7.16 The construction phase is estimated to take 18 months. According to the Additionality Guide (HCA, 2014) 174 gross construction jobs is referred to as 'gross direct' employment per annum.
- 7.17 Taking account of leakage, displacement and the multiplier effect, it is calculated that the total net direct and indirect jobs created estimated to be generated from construction of the proposed development is **185 jobs** per annum.

Table 2: estimated construction job breakdown

	Variable	Calculation
A	Gross Construction Jobs	174
B	Gross Direct Construction Jobs per annum (A/1.5)	116
C	Leakage (-B*30%)	-34.8
D	Onsite jobs for residents within the administrative boundary of Welwyn Hatfield Borough Council (B+C)	81.2 (81 Jobs)
E	Displacement (-D*25%)	-20.3
F	Multiplier $[(D+E)*(2.7-1)]$	103.53
G	Net Direct and Indirect Jobs (D+F) per annum	184.73 (185)

- 7.18 The average weekly earing for those working in the construction sector have been used to estimate the total amount of earnings from the number of on-site jobs. This data is summarised in Table 3. The most recent entry to this dataset indicates that average weekly earnings in the construction sector equate to £730 per week in England, or £38,010 annually. The average annual salary in Welwyn Garden City for a construction worker is £37,997.

Table 3: median weekly earnings in the UK, England and Welwyn Hatfield (April 2022, Indeed)

Output Level	Median Weekly Earnings in Construction ¹
United Kingdom	£725
England	£730
Welwyn Garden City	£730

¹ https://uk.indeed.com/career/construction-laborer/salaries/Welwyn-Garden-City?from=top_sb

- 7.19 Table 2 shows that 174 full time on-site construction jobs would be created annually for residents from within the borough. This would suggest that the total amount to be paid in salaries for onsite construction jobs to residents from within the borough equates to **£6,611,478** over the duration of the construction phase.
- 7.20 This figure does not account for the level of employment that would be generated through the multiplier effect such as salaries associated with sub-contractor jobs or expenditure into the local economy as a result of the job creation.

Other Economic Benefits

Expenditure of new residents

Table 4: average weekly household expenditure in the UK, England and South East (March 2021: ONS)

Output Level	Weekly Household Expenditure (£)²
United Kingdom	£585.20
England	£600.50
South East	£698.60

- 7.21 Based on an average weekly household expenditure of £698.60 in the southeast between the end of the 2018 financial year and 2018 (released March 2021, ONS), it is estimated that the 145 proposed residential units will result in a total weekly expenditure of £98,919 or **£5,143,788** annually.
- 7.22 It is recognised that a portion of future residents of the proposed scheme will likely live in Welwyn Hatfield already and so this figure is not entirely representative of the additional income to the town or the borough. Nevertheless, given the Site's relatively accessible location within Hatfield town, it is considered that the scheme will attract a high proportion of new residents from outside Welwyn Hatfield. The result will be a significant generation of net expenditure that is not currently flowing through the local economy.

Planning Obligations

- 7.23 Though it is acknowledged that developer obligations will be made to fund infrastructure and service requirements necessitated by the proposal and wouldn't necessarily directly induce net economic benefit, it will nonetheless contribute to job retention and thus have a lateral effect through the economy. Furthermore, the extent of obligations will ensure the local authority is not at an economic disadvantage following implementation of the proposed development.

Conclusion

²<https://www.ons.gov.uk/peoplepopulationandcommunity/personalandhouseholdfinances/expenditure/datasets/familyspendingworkbook3expenditurebyregion>

- 7.24 The proposed development will contribute towards local and wider employment generation, as well as economic productivity. It will generate a number of positive economic benefits which strongly reflect the sustainable development aspirations of the NPPF and local policy and strategy ambitions.
- 7.25 Without regard to the economic benefits from employment generated through construction of the proposed scheme, the primary economic benefit will be the increased demand for local services and a consequential increased expenditure.
- 7.26 The economic benefits during the construction phase and upon completion is estimated to generate significant economic benefits. These are summarised in the below:

Employment Benefits	
Net Direct and Indirect Jobs	185
Total onsite construction jobs for local residents	174
Total construction salaries for local residents	£4.04M
Other Economic Benefits	
Annual gross expenditure of new residents	£5,143,788

8.0 Conclusions

8.1 This Planning Statement is submitted on behalf of Hatfield Park Homes Ltd in relation to the proposed redevelopment of Former Beales Hotel, Comet Way, Hatfield, A10 9NG for:

“Demolition of existing building and construction of residential units (Use Class C3) with private and communal amenity space, landscaping, access, associated car and cycle parking, refuse and recycling storage and supporting infrastructure.”

8.2 The proposal has evolved and improved following pre-application discussions with the Council, incorporating recommendations of the planning officers. In the context of WHBC’s lack of five year housing land supply, the proposal will deliver 145 new high-quality homes on a previously developed site.

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

8.4 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.”*

8.5 The Welwyn Hatfield Local Plan was adopted in 2005 (with saved policies adopted in 2008) and covered the period up to 2011. All policies within the Development Plan are therefore out-of-date meaning Paragraph 11d is engaged.

8.6 Policies in the Development Plan are out-of-date not just because they pre-date the NPPF but because, in accordance with footnote 8³, the Council cannot demonstrate a 5 year land supply whilst the 2021 Housing Delivery Test results show the delivery rate from 2018/19 to 2020/21 was 66%. This is below the 75% ‘presumption in favour of development’ threshold.

³ This includes, for applications involving the provision of housing, situations where the local planning authority cannot demonstrate a five year supply of deliverable housing sites (with the appropriate buffer, as set out in paragraph 74); 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.

8.7 The proposed development must therefore be assessed against 11di and 11dii. It is demonstrated in this Planning Statement that the proposed development does not meet:

- Paragraph 11di insofar that other than heritage assets, none of the protected areas or assets, as set out in Footnote 7⁴, are affected by the Appeal Proposal. With regards to heritage assets, strong evidence is presented to demonstrate that no harm will be caused. Therefore, the application of heritage policies does not provide a clear reason for refusing the development proposal; and
- 11dii, insofar that no adverse impacts are shown to exist. Therefore, benefits (listed below) that will be delivered by the Appeal Proposal are not significantly and demonstrably outweighed, when assessed against the policies in the NPPF taken as a whole.

8.8 The tilted balance is therefore applied in support of the Appeal Proposal and the presumption in favour of sustainable development adopted.

8.9 The proposal would deliver the following key benefits:

- Delivery of housing on a previously developed brownfield site which is underutilised and available for development in the short term;
- Use of an accessibly and sustainably located site to provide 145 residential units including a high proportion of family sized units and wheelchair adapted dwellings to contribute towards boosting housing supply in the district;
- Improvements to the aesthetic quality and visual appearance of the Site, with the new building taking design cues from the area's past and architectural language, thereby contributing to a greater sense of identity for the area;
- New jobs during the construction phase and additional economic benefits through future residents' expenditures. The increased activity and spending would encourage economic growth and enhance the vitality and viability of Hatfield;
- Provision of high standard accommodation with private and communal amenity space for future residents to promote a high quality of living;
- Protection of neighbouring amenity at Parkhouse Court;
- Visual and amenity enhancements through a site-wide bespoke landscaping proposal, introducing new native planting (including tree planting) and creating inviting outdoor spaces for future residents to enjoy;
- An exceptionally high biodiversity net gain of almost 500%, representing a significant improvement to the current site conditions;

⁴ The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 181) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 68); and areas at risk of flooding or coastal change.

- Integration of fabric-first measures and renewable energy technologies such as photovoltaic panels to achieve a significant 37% reduction in carbon emissions; and
- Encouragement of sustainable modes of travel through the provision of Electric Vehicle Charging Points, car club bay, cycle parking and Framework Travel Plan.

8.10 This Planning Statement establishes that the proposed development is in accordance with the Development Plan when read as a whole and other material planning considerations. Furthermore, in accordance with NPPF paragraph 11d, the tilted balance is engaged and presumption in favour of sustainable development must be given. Planning permission should therefore be granted without delay.



Appendix 1: Council's Pre-application Response



██████████
HGH Consulting
W1G 8DZ

Colin Haigh
Head of Planning

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

4 March 2021

Dear ██████████,

Application Reference: 6/2021/0010/PA

Proposal: Demolition of existing buildings and erection of 161 residential units with associated private and communal amenity space, car and cycle parking and landscaping.

Location: Beales Hotel, Comet Way, Hatfield, AL10 9NG

Advice: Level 3 Dwellings (10 or more units)

Thank you for your pre-application enquiry which was received on 11 January 2021. Further to our meeting on 15 February, please find below the Council's response to your proposal.

Key considerations:

- Principle of development
- Impact on area's character
- Heritage impact
- Effect on living conditions of neighbouring properties and future occupiers
- Parking provision
- Planning obligations

Principle of development

The application site would be a suitable location for windfall housing in accordance with Policies SD1, GBSP2 and H2 of the District Plan. The principle of residential development is accepted.

The submitted Design & Access Statement touches on the suitability of the site for student accommodation. The site is within close walking distance to the University of Hertfordshire and has the potential to be suitable for additional student accommodation. If the applicant opts to submit a planning application for such a proposal, I advise that the application is supported by evidence to demonstrate the likely demand for such accommodation in the private rented sector in Hatfield. Matters of supply and demand are relevant to ensure that there is not an oversupply of student accommodation.

Impact on area's character

The site is located on the northern side of Comet Way close to Comet Roundabout. This part of Comet Way has a mixed character and includes building of varying scale and height.

To the eastern side of the site is Parkhouse Court and Harpsfield Hall. Parkhouse Court is a 5-6 storey building including ground floor commercial uses with flats above. Harpsfield Hall is a two storey restaurant/public house located closer to Comet Way.

To the western side of the site is surface level car parking and beyond this are a cluster of four, four storey commercial buildings. Surface level car parking also abuts the northern boundary of the site.

Facing the site on the opposite side of Comet Way is The Galleria shopping centre. This is a substantial flat roof building. The part of this building opposite the site is estimated to be around 20 metres in height.

The proposed building would increase in height from 5-7 metres across its width and be nine storeys in height to the northern corner. In my view, the proposed building would be notably taller than any other building in its context on this side of the road and appear unduly prominent on approach on Comet Way in both directions. For these reasons, I consider that the development would fail to adequately respect and relate to the area's character, in conflict with Policies D1 and D2 of the District Plan, the Council's Supplementary Design Guidance (SDG) and the NPPF.

I have no objection to the facing materials indicated on the Design and Access Statement.

Heritage impact

The Council's Built Heritage Consultant has raised concern that the proposed nine storey height could result in a building that detracts from the views from Hatfield House and Park by introducing additional built form within the wider landscape.

It is therefore recommended that the views west from Hatfield House and Park (both Grade I Listed) are properly assessed to identify height parameters for the site. I understand from our meeting that this will be taking place.

In my view, if my above recommendations regarding the height of the development are followed, there is unlikely to be any harmful effect on the setting of designated heritage assets.

Effect on living conditions of neighbouring properties and future occupiers

During the pre-app meeting I raised concern regarding the close proximity of the proposed development to the adjacent flats at Parkhouse Court. A revised plan has been provided increasing the separation distance. Having regard to this revised plan, it is my view that the separation distance between Parkhouse Court and the proposed nine storey block is not sufficient to prevent the nine-storey block from appearing unduly dominant from Parkhouse Court or significantly reducing afternoon sunlight to these facing neighbouring flats. Harm to the living conditions of its occupiers would result, in conflict with Policy D1 of the District Plan, the SDG and NPPF.

In terms of future occupiers, the floor area of all flats and bedroom size must comply with the Government's Technical housing standards – nationally described space standard. Also, any windows facing out toward communal amenity areas or footways must have an appropriate landscaped buffer in order to prevent direct overlooking/privacy loss and mitigate the likelihood of perceive overlooking. A planning application should be supported by a sunlight and daylight assessment which demonstrates that the development would accord with relevant standards.

Having regard to the location of the site and following consultation with the Council's Public Health & Protection Team, a noise impact assessment, air quality assessment and contaminated land assessment would be required. It is recommended that these reports are provided alongside a planning application. The detailed consultation response from the Council's Public Health & Protection Team can be provided upon request.

Parking provision

The car parking standards set out in the Supplementary Planning Guidance – Parking Standards 2004 (SPG) are now treated as guidelines rather than maximums. Car parking provision is now decided on a case-by-case basis in order to achieve a sensible level of provision taking account of existing SPG standards, NPPF guidance, the relevant circumstances of the proposal, its site context and its wider surroundings.

The development would include one, two and three bed flats and 38% of units would not have a car parking space. Such a level of provision would be significantly below the SPG provisions and such a level of provision would not be adequately offset by the sustainable location of the site or other mitigating measures such as car clubs, high levels of cycle provision or a travel plan.

Cycle provision should accord with the ratio set out in the Council's SPG.

Taking account of the above, I consider that the proposed development would fail to provide a sufficient level of car parking for future residents, in conflict with the Council's interim parking guidance and the NPPF.

Planning obligations

Affordable housing

Policy H7 of the District Plan states that the Council will expect the site to include the provision of affordable housing to meet the needs of local people who cannot afford to occupy dwellings generally available on the open market. That policy requires a minimum of 30% to be sought which should comprise subsidised housing.

Policy SP7 of the Emerging Local Plan requires 25% of new homes in Hatfield to be affordable. Considering the substantial body of evidence supporting affordable housing and Policy SP7, the on-site delivery targets for affordable housing in the Emerging Local Plan are now being applied rather than the baseline percentage identified in the District Plan.

A recent planning permission in Hatfield has required a 50/50 split between social housing and intermediate tenure.

Other contributions

Other Welwyn Hatfield Borough Council contributions would likely be required toward: waste and recycling provision, green space, play facilities and indoor and outdoor sport and recreation. The exact sums would be provided during a planning application. A monitoring fee, capped at £5,000 is also stipulated under the Council's Planning Obligations SPD.

Hertfordshire County Council and NHS contributions will also likely be required. The exact sums would be provided during a planning application.

Planning balance and conclusion

Based on the submitted information, it is my opinion that the proposed development would fail to respect and relate to the area's character and cause harm to the living conditions of neighbouring occupiers facing the site at Parkhouse Court. Furthermore, an insufficient number of car parking spaces would be provided.

Consequently, the development would conflict with Policies GBSP2, H2, D1, D2 and M14 of the District Plan, the Council's SDG, SPG, Interim Parking Policy and also the NPPF. This harm would significantly and demonstrably outweigh the benefits of the proposal (namely the provision of additional housing), when assessed against the policies in this Framework taken as a whole.

Is the development likely to be approved or refused?

Approved Refused

Any suggested changes Yes No

The changes suggested, in order to increase the likelihood of planning permission being granted comprise:

- Reduce the height of the L-shaped block (nearest to Comet Way) to five storeys and reduce the nine storey block to seven storeys in height.
- Increase the separation distance annotated as '21371' on drawing number DIA-GA-P-L01 Rev P 1 to 23.2 metres. In other words, flush with the rear wall of the 3B6P flat coloured orange

I would suggest that you discuss the proposal with neighbours before submitting an application as we will consult them along with the Town Council once the application is received.

Please note that pre-application advice has not been sought from Hertfordshire County Council, Transport Programmes and Strategy, Hertfordshire Ecology, Environment Agency or the Lead Local Flood Authority as they each provide their own pre-application advice service, subject to a fee.

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.

Please read this advice with the associated pre-application guidance leaflet.

Yours sincerely,



David Elmore
Senior Development Management Officer



hghconsulting.com