
Planning Statement

(inc. Affordable Housing Statement)

Campus East Car Park, College Way, Welwyn
Garden City, Herts, AL8 6DG

Bellway Homes Ltd (North London)

Planning Statement

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1. Introduction

- 1.1 This Planning Statement has been prepared in support of a detailed planning application submitted to Welwyn Hatfield Borough Council (hereinafter referred to as “the Council”) on behalf of Bellway Homes Ltd (North London) (hereinafter referred to as “Bellway”). The application proposals involve the comprehensive redevelopment of the existing Campus East Car Park (hereinafter referred to as “the site”) to provide a residential scheme of 313 dwellings (Use Class C3), including 30% affordable housing, within five new buildings of high-quality design, set within comprehensive landscaping.
- 1.2 The site has long been identified as a suitable development opportunity. It was first allocated for redevelopment within the current Local Plan (The District Plan) which was adopted in 2005. The site is also allocated within the emerging Local Plan, where it is included on a list of sites endorsed by the Council and considered sound by the Examination Inspector. However, despite this long planning policy status no development proposals to date have been progressed.
- 1.3 More recently, the Council has published its Welwyn Garden City 2120 Framework, which seeks to stimulate regeneration in the town centre area. The document identifies five sites for development, including the Campus East Car Park site which it calls a major development opportunity with the potential to deliver new homes. The WGC 2120 Framework recognises the importance of the site’s delivery in order to in unlock and facilitate the regeneration of the remaining development sites within the town centre area. To prepare the site for new housing, the Council has been awarded grant funding by Homes England under its Local Authority Accelerated Construction Programme.
- 1.4 The site’s redevelopment is also linked to the future of the council-owned ‘Campus West’ Car Park site, where the Council intends to expand the existing car park as part of a wider car parking consolidation strategy, which would in turn facilitate the redevelopment of the site at Campus East for residential use. The Campus West application (6/2021/2207/MAJ) was considered by the Council planning committee on 9th December 2021, who voted almost unanimously in favour of the application. The Decision Notice granting full planning permission was issued on 17th December 2021. In anticipation of the site coming forward, the Council has already begun development at the Campus West Car Park.
- 1.5 Following a competitive tender process, Bellway were selected by the Council as its preferred development partner in 2021. Bellway’s bid proposal included provision of 30% affordable housing, which is maintained within the scheme proposals. The scheme proposals which are submitted, in terms of site layout and the positioning of the proposed residential buildings, remains similar to the early bid stage scheme, which itself followed a set of design principles established in the WGC 2120 Framework document. The Framework itself was subject to public consultation and was published alongside an accompanying Building Code and a Heritage and Townscape Assessment.

Description of Development

- 1.6 The application seeks full (detailed) planning permission for the following development proposals:

“Demolition of all existing buildings and structures followed by the erection of five buildings to provide 313 residential units (Use Class C3) including 30% affordable housing, resident’s car parking, cycle storage, refuse storage, hard and soft landscaping, external lighting, drainage, infrastructure and all associated works.”

The Applicant

- 1.7 Bellway is one of the largest and most experienced homebuilders in the UK. As a national housebuilder, Bellway has considerable experience and expertise in delivering sustainable residential schemes that people want to live in. The company has extensive experience of construction and property development, and of working in partnership with both local authorities and affordable housing providers.
- 1.8 Bellway has significant in-depth knowledge and experience of the local market, with many completed schemes within Hertfordshire, alongside several other schemes currently at various stages. It aims to develop vibrant communities with a true sense of place that fit into their surrounding area and meet the needs of local people. The company is committed to innovation in both construction and design and is keen to ensure that the schemes brought forward create sustainable, attractive and desirable places for people to live and work.

Overview of Development

- 1.9 The proposed development involves the demolition of the existing structures and the construction of five new buildings spread across the site providing 313 residential dwellings. The proposed site layout responds to the site’s constraints and opportunities. The buildings heights and scale mediate between the larger format buildings surrounding to the site to the south, and the smaller scale residential streets to the north. The pattern and grain of the development is consistent with the positive elements of the urban town centre in which the site is located. In particular the site layout is landscape-led, and in recognition of the founding principles of Welwyn Garden City, the site is arranged around a central landscaped space.
- 1.10 The proposals provide a range of different size dwellings including one-bed properties, two-bed properties and three-bed properties. The mix will predominantly focus on one and two-bed properties owing to the site’s sustainable location and the requirement to appropriately optimise the site’s development capacity in such an accessible location close to shops, facilities and other local amenities. The proposals include 30% affordable housing as required by Council planning policy. Given the site’s highly accessible location, the proposals include car parking provision at an appropriate level which seeks to encourage travel by sustainable modes.

Supporting Documents

1.11 This Statement should be read in conjunction with the submitted plans and drawings as well as the following documents which have been prepared to address the full range of planning considerations:

Document	Author	Date / Version
Covering Letter	Savills	Nov 2022
Planning Application Forms & Certificate B	Savills	Nov 2022
CIL Information Form 1	Savills	Nov 2022
Planning Statement (inc. Affordable Housing Statement)	Savills	Nov 2022
Heritage, Townscape & Visual Impact Assessment	Savills	Nov. 2022
Site Location Plan	Saunders	Nov. 2022
Existing Drawings	Saunders	Nov. 2022
Demolition Drawings	Saunders	Nov. 2022
Proposed Plans, Section & Elevations	Saunders	Nov. 2022
Design & Access Statement	Saunders	Nov. 2022
Drawing Schedule	Saunders	Nov. 2022
Schedule of Accommodation	Saunders	Nov. 2022
Flood Risk Assessment & Drainage Strategy	Ardent	2007511-07A
Utilities Statement	Ardent	2007511-08
Air Quality Assessment	Ardent	2007511-03A
Transport Assessment	Ardent	2007511-11
Residential Travel Plan	Ardent	2007511-06
Car Parking Management Plan	Ardent	2007081-13
Waste Management Plan	Ardent	2007511-14
Construction Traffic Management Plan	Ardent	2007511-10
Noise & Vibration Assessment	Ardent	2007511-09A
Archaeological Desk Based Assessment	RPS	Oct. 2022
Phase 1 & 2 Geo-Environmental Assessment	EPS	Nov. 2021
Ecological Appraisal	Aspect	Oct. 2022
Arboricultural Impact Assessment	Aspect	Oct. 2022
Biodiversity Net Gain Assessment	Aspect	Nov. 2022
Energy & Sustainability Assessment	Energist	Nov. 2022
Overheating Assessment	Energist	Nov. 2022
Landscaping Statement	Macfarlanes	Oct. 2022
Landscaping Drawings	Macfarlanes	Oct. 2022
Daylight & Sunlight Assessment	Eb7	Nov. 2022
Construction Environmental Management Plan (Demo)	Bellway	Nov. 2022
Construction Environmental Management Plan (Construct.)	Bellway	Nov. 2022
Statement of Community Involvement	Marengo	Nov. 2022
Fire Safety Strategy	Ashton	Nov. 2022
Financial Viability Assessment	JRBC	Nov. 2022

Structure of the Statement

1.12 The structure of this Planning Statement is as follows:

- **Section 1** provides the introduction to the application;
- **Section 2** provides the background to the site and its context within the surrounding area;
- **Section 3** sets out an overview of the planning history of the site, and the pre-application engagement process;
- **Section 4** provides a summary of the development proposals;
- **Section 5** sets out the relevant planning policy framework for the site;
- **Section 6** provides an assessment of the proposals against the policies contained within the Development Plan, alongside consideration of any relevant material planning considerations arising;
- **Section 7** provides a summary of the development's Affordable Housing Strategy
- **Section 8** considers the planning obligations likely to be required by the proposals;
- **Section 9** provides a summary of the main benefits of the scheme; and
- **Section 10** presents our conclusions in respect to the submitted proposals.

2. The Site and Surrounding Area

- 2.1 This section provides a brief description of the site and the immediate surrounding area.
- 2.2 The application site is located within Welwyn Garden City town centre to the northeast of The Campus (B195), accessed via a spur road from the College Way roundabout. The site measures approximately 2.1ha and comprises a large surface car park with partial deck structure, level with College Way. Beneath the decked level, the level of the remainder of the site falls away towards the railway lines which flank the entire eastern boundary of the site. Two significant tree groves are located at the entrance to the car park with further trees located within the site. Refer to the submitted Site Location Plan for the extent of the site.
- 2.3 With reference to the adopted Policies Map, the entire site falls within the Town Centre Area. The southern half of the site falls within the boundary of the Town Centre Conservation Area. There are no statutorily listed buildings within the immediate vicinity of the site whose settings might potentially be affected. The majority of the site is located within Flood Risk Zone 1 indicating there is low probability of flooding from any source, however areas through the centre of the site and at the outer edges are considered to be at high risk of surface water flooding, according to the mapping data provided by the Environment Agency.
- 2.4 To the west and south of the site are a range of large footprint buildings in civic, education, retail and residential uses which are also accessed via College Way. These include Oaklands College buildings, Peel Court (assisted living accommodation), the Council offices, and the Waitrose supermarket. To the north of the site is a residential neighbourhood focused around Gresley Close and Blakemere Road, which is predominantly characterised by two storey detached and semi-detached houses with wide tree lined streets.
- 2.5 The site's eastern boundary is flanked by a section of railway track which links Welwyn Garden City Station, located just to the south, with Welwyn North Station to the north. This includes a parcel of land located outside of the site on land owned by Network Rail which relies on vehicular access through the site to the south of the deck structure. The submitted proposals have been designed in order to maintain this route of access to the Network Rail site. Beyond the railway line on the other side of the tracks is the Bressemer Road industrial estate.
- 2.6 Further southwest of the site, beyond the railway lines, the town centre area is undergoing significant change. At what has historically been the town's industrial area, centered around the former Shredded Wheat factory, a number of residential-led mixed-use schemes have been granted planning permission, which will alter the character of this area. Several residential-led mixed-use developments are transforming previously developed brownfield land to bring forward much-needed new homes and employment uses within the town centre area, within close proximity to Welwyn Garden City railway station. Major sites of a similar nature which are already consented include the Wheat Quarter (former Shredded Wheat factory) and the former Bio Park site.

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2.7 Welwyn Garden City Station is located approximately a 450m walk to the south of the site. This station provides access to Thameslink and Great Northern services linking London and Cambridge. The closest bus stops to the site are located on Bridge Road and The Campus, all within approximately a 150m walk. These stops provide access to a wide range of services to surrounding settlements. Clustered around Welwyn Garden City Station there is an extensive range of town centre uses, all within a 600m walk from the site. This includes supermarkets, restaurants and bars, cafes, shops, banks, pharmacies and other town centre uses.

3. Planning History and Pre-Application Engagement

- 3.0 This section provides details of the planning history and pre-application background of the site to provide the context within which the application is made.

Planning History

- 3.1 With reference to the Council's online planning register, the planning history of the site is largely irrelevant being comprised of several applications for minor physical works to the garage structures. There have been no previous planning applications submitted for the comprehensive redevelopment of the site.
- 3.1. In May 2022, on behalf of Bellway, Savills submitted a Screening Opinion Request pursuant to the Environmental Assessment Regulations. The purpose of screening a development is to establish whether or not a development is likely to have *significant effects* upon the environment, and whether an Environmental Impact Assessment (EIA) is required.
- 3.2 At the beginning of June 2022, the Council issued a negative screening opinion which confirmed the Council's view that the site's development would not have significant environmental effects, therefore it was agreed through this formal process that the future application would not be considered EIA development.

Pre-Application Engagement

- 3.3 Following the bid stage which involved a competitive tender process, and prior to the submission of this full planning application, Bellway entered into a Planning Performance Agreement with the Council. The PPA provided a constructive framework for the pre-application engagement process and ensured that the full range of necessary considerations were discussed between Council officers and their external consultees, and Bellway's design and technical team in order to shape the application proposals. As a result, Bellway have engaged extensively with planning officers.
- 3.4 In total, a series of eight meetings have taken place since November 2021 between Bellway, their design and technical team, and the Council and their internal and external consultees. Early meetings were focused around the early design concept for the site formed at bid stage and confirmed the principle of residential use as being acceptable, as well as agreeing the range of matters considered to be relevant to the site's redevelopment. The list of application documents that would be necessary to assess a future planning application was also scoped between the Council and Bellway and was agreed at this stage.
- 3.5 As the emerging design was further refined and developed, it was discussed at various stages with planning officers and the Council's external design and conservation officers at Essex Place Services. Building heights were reduced during this process. Agreement was reached that the proposed site layout, heights and scheme design were acceptable and would provide a high-quality, landscape-led development. During the scheme's

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design evolution, the relationship of the proposed buildings with the central green space was a key factor, alongside the minimization of internal roads and residents' car parking.

- 3.6 Following this agreement regarding the site layout, height, scale and massing, discussions turned towards the architecture itself, including the detailed building fenestration and materiality used, the ratio of void to solid, the windows sizes and spacing, and variation in the architectural language of each block and the roofscapes. It was agreed with officers that a modern interpretation of the classic neo-Georgian architecture that is so prevalent within Welwyn Garden City was appropriate for the scheme. For example, this interpretation can be appreciated in the proposed window design, which respects the 'golden ratio' ideal.
- 3.7 During this pre-application period there was extensive discussion with Council officers regarding the scheme's approach to the mitigation of noise and overheating, given the site is subject to a relatively high ambient background noise level, given it's location within the town centre. The prevailing noise climate is influenced by the surrounding road and rail noise, and commercial noise from servicing operations at the nearby supermarket. A methodology for measuring the site's noise environment was agreed and during these discussions Bellway's design and technical team provided Council officers with an extensive amount of technical information to demonstrate that the scheme would achieve the relevant Building Regulation standards for noise and overheating, and would therefore ensure a suitable level of residential amenity.
- 3.8 Other discussions with Council officers covered issues such as residential parking provision, the mix of residential dwellings and the scheme's approach to affordable housing provision. Further details of the way in which the scheme was developed and shaped by the pre-application engagement process with Council officers are included within the submitted Design & Access Statement.
- 3.9 During this period, Bellway's team also discussed the emerging proposals extensively with elected Members, local stakeholder groups, statutory consultees such as Historic England and of course, members of the public. The extent of pre-application engagement with these parties is described in detail within the submitted Statement of Community Involvement. Where possible, the scheme has been amended as a result of feedback and has been shaped by these discussions. For example, following feedback regarding the relationship between Building C/D and the nearby Junction Cottages, the height of Building C/D was reduced by a storey.
- 3.10 As a result of the extensive pre-application discussions summarised above, the layout and design of the scheme have been developed and refined in response to the comments and feedback received. The feedback from Council officers, consultees and other local stakeholders has been instrumental in helping to shape the scheme and create the best development possible for this site.
- 3.11 Alongside the submission of this planning application for the site's redevelopment, a separate planning application for enabling development is also being submitted. This application seeks permission for the demolition of the structures on the site including the existing garages to ground level, in order to facilitate the site's development as early as possible, once the main planning application (to which this Planning Statement relates), is granted by the Council.

4. The Proposed Development

4.1 This planning application seeks detailed permission for the demolition of the existing structures on the site to provide a residential scheme involving the erection of five new buildings to provide 313 residential dwellings (Use Class C3) including 30% affordable housing. The total proposed residential mix is shown below.

Table 4.1 Total Proposed Residential Mix

Dwelling Size	Total Units	Percentage
1 bed 1 person	1	37%
1 bed 2 person	115	
2 bed 3 person	27	58.5%
2 bed 4 person	156	
3 bed 4 person	7	4.5%
3 bed 5 person	7	
Total	313	100%

4.2 Bellway's application proposes to provide a policy compliant level of affordable housing provision (30%). Therefore, of the total number of dwellings above, 94 will be provided as affordable residential dwellings. The proposed affordable housing mix and tenure mix is set out at **Table 4.2** below.

Table 4.2: Proposed Affordable Housing Mix & Tenure Mix

Dwelling Size	Affordable Rent Units	Shared Ownership Units
1 bed	28	10
2 bed	34	18
3 bed	4	0
Sub-Total	66 (70%)	28 (30%)
Total	94	

4.3 The proposed market housing mix is set out at **Table 4.3** below.

Table 4.3: Proposed Market Housing Mix

Dwelling Size	Total Units	Percentage
1 bed	78	35.6%
2 bed	131	59.8%
3 bed	10	4.5%
Total	219	100%

4.4 As can be seen above, the dwelling mix contains predominantly 1-bed and 2-bed dwellings in order to appropriately optimise the development capacity of the site. A smaller number of family sized 3-bed dwellings are included. All dwellings meet the Nationally Described Space Standards.

5. Planning Policy Context

- 5.1 The proposals for the site have been prepared with consideration for relevant national and local planning policy and associated guidance. This section of the Planning Statement provides a brief summary of the relevant planning policies contained within the Development Plan, whilst the following section demonstrates how the scheme achieves compliance with these policies.
- 5.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004, and Section 70(2) of the Town and Country Planning Act 1990, both require that applications for planning permission are determined in accordance with the provisions of the Development Plan, unless any other material considerations indicate otherwise. The Development Plan is comprised of the following:
- The Welwyn Hatfield District Plan (April 2005).
- 5.3 To support the District Plan the Council has adopted a number of supplementary planning guidance documents to give further detail on how certain policies should be applied. The following supplementary planning guidance documents are of relevance to the site and the development proposals:
- Parking Standards SPG (January 2004);
 - Supplementary Design Guidance (February 2005);
 - Planning Obligations SPD (February 2012);
 - Interim Policy for Car Parking Standards and Garage Sizes (2014); and
 - Welwyn Garden City Town Centre North SPD
- 5.4 Within the District Plan the site is covered by the following planning allocations and designations:
- The entire site falls within the Welwyn Garden City Town Centre Area;
 - The western half falls within the Welwyn Garden City Conservation Area;
 - New Housing Development – Welwyn Garden City Town Centre (Ref. HS22); and
 - Development Site – Campus East (Ref. TCR5).
- 5.5 With regards to the New Housing Development destination, the wider Welwyn Garden City Town Centre site is identified to deliver an estimated 50 residential dwellings. With regards to the Development Site allocation, the Campus East Car Park site is identified for mixed-use development comprising retail, office and residential uses. No quantum is specified for any of the uses.

- 5.6 Within the emerging Local Plan, The Council is proposing to replace the 'New Housing Development' designation and the 'Development Site' allocation within the District Plan with a new 'Other Key Site' allocation (Ref. SADM21). Unlike the site allocation within the adopted Local Plan, this identifies the site for residential development only with an indicative capacity of 250 dwellings. The Welwyn Garden City Town Centre and Welwyn Garden City Conservation Area boundaries remain unchanged within the draft New Local Plan.
- 5.7 In addition to the Development Plan documents listed above, the National Planning Policy Framework (2021) and associated Guidance, are material considerations in the determination of all planning applications in England. They provide the Government's latest policy direction for local planning authorities and applicants to follow. Paragraph 218 of the Framework states that policies in the Framework are material considerations which should be taken into account in dealing with applications from the day of publication. Plans may also need to be revised to reflect policy changes which the Framework has made.
- 5.8 At the national level, the NPPF provides an overarching framework for the production of local policy documents and the determination of planning applications. The Government's NPPF acts as guidance for local planning authorities and decision takers, both in drawing up plans and making decisions about planning applications. At the heart of this document is a presumption in favour of sustainable development running through both plan-making and decision-taking.
- 5.9 The Government expects the planning system to deliver the homes, business, infrastructure and thriving local places that the country needs, whilst protecting and enhancing the natural and historic environment. The NPPF makes clear that the Government's objective is to significantly boost the supply of homes.
- 5.10 Of relevance to the consideration of the proposed development is the Council's current housing land supply. Paragraph 11(d) of the NPPF, provides that where there are no development plan policies, or the policies which are most important for determining applications are out of date, decision takers should grant permission unless:
- The application of policies in the Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed (i.e. the site is located within the Green Belt, or other protected landscape area); or
 - Any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework when taken as a whole.
- 5.11 As footnote 8 to Paragraph 11(d) makes clear, where applications involving the provision of housing are proposed, then planning policies are considered out of date in circumstances where the local planning authority cannot demonstrate a five year supply of deliverable housing sites (with the appropriate buffer) 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.

- 5.12 It was established by the recent Bio Park appeal decision, published in July 2022, that the Council does not have a five year housing land supply. The Inspector's appeal decision commented that "*the Council and the appellant agree that the housing land supply in the Borough is currently in the range of 1.75-2.46 years*". Therefore, due to the lack of a five-year housing land supply, the policies most important for determining the application are out of date and the 'tilted balance' is engaged.
- 5.13 A second measure is the Council's performance against the Housing Delivery Test. Under the latest HDT results published in January 2022, the Council failed by a substantial margin achieving a score of 66% thus confirming the presumption in favour of sustainable development is also engaged by this metric. On the subject of housing delivery, the Bio Park appeal Inspector surmised that "*the Council is persistently failing to provide the number of homes needed in the area and there is currently no firm plan to rectify that situation.*"

Emerging Planning Policy

- 5.14 The The Council is in the process of preparing a new Local Plan which, once adopted, should set out the planning framework for the Borough up to 2032 and will replace the 2005 District Plan.
- 5.15 The new Local Plan was submitted to the Secretary of State for Examination in Public in May 2017. Examination of the Plan has been significantly protracted with the last lot of Hearing sessions only concluding in August 2021. The Council is currently in discussions with the Inspector appointed to undertake the Examination. In recent updates the Council have responded to the latest Examination Inspector's letter and have stated they will not be in a position to consider the options until the results of this year's monitoring is complete. This follows a number of reports written by the Examination Inspector relating to the soundness of the Plan and the need for more sites to be added in to the Plan.
- 5.16 In a letter dated 31st January 2022, the council's former Head of Planning wrote to the Inspector to advise that following a Full Council meeting, a list of sites which are not dependent on the release of land from the Green Belt or the creation of a new settlement, totaling 13,279 homes have been agreed. The list includes Site Han40a, referred to as "Town Centre North- Campus" which is identified for the provision of 250 homes within the first 3-5 year period of the Plan. The "Town Centre North- Campus" site is the Campus East Car Park.
- 5.17 The total number of homes proposed by the Council remains short of the minimum number the Inspector has advised should be provided for, therefore it remains to be seen whether the Inspector will accept the Council's position on housing numbers, and agree to continue the Examination on this basis. Should the Inspector and the council find a way forward, then it appears likely that the site's proposed allocation for 250 homes will remain within the draft Plan.

- 5.18 Any planning application for the site's development would therefore be assessed against the policies contained within the adopted District Local Plan (including Policy TCR5), policies contained within the NPPF, and any other material considerations. In this respect any application for housing upon the site would need to be assessed by the decision maker in the context of the fact that the Council has no five year housing land supply, and under the Housing Delivery Test 2021 measurement, Welwyn Hatfield Borough Council scored 66%.
- 5.19 Therefore, under NPPF Para 11d(ii), because the relevant Development Plan policies which are most important for determining an application are considered 'out of date' (which, as footnote 8 clarifies includes situations where the LPA cannot demonstrate a 5 year housing supply), the decision maker should grant planning permission unless 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.
- 5.20 Under these circumstances the redevelopment of the site is considered to benefit from significant policy supporting at a national level. It is previously developed brownfield land, located in a highly sustainable location, where there is a constrained housing land supply position. The thrust of the policies within the NPPF are that such sites should be prioritized for redevelopment particularly in a LPA area with significant land use constraints such as Green Belt. Housing development should be optimised on such sites to ensure the site's capacity for development is not wasted and the benefits are maximised.
- 5.21 Other relevant material considerations weighing in favour of an application for housing upon the site include the publication of the WGC 2120 Framework. Although it is not a document which has undergone Examination in Public and therefore does not form part of the adopted Development Plan, it has been prepared by the council including planning officers, and has undergone public consultation as part of the wider council strategy for the town centre area which the document summarises.
- 5.22 Whilst this statement will demonstrate that the proposed development is acceptable in its own right, having regard to the Development Plan and all other material considerations, it is relevant to note at the outset that the proposed development should be assessed by the Council with the 'titled balance' engaged. The proposed development is a deliverable housing site located in a sustainable location and will make a substantial contribution to Welwyn Hatfield Borough Council's immediate housing supply, including the supply of much-needed affordable housing.

6. Planning Assessment

6.1 This section of the Planning Statement sets out the main planning policy considerations arising from the application proposals, and provides an assessment of the proposals against these including any material considerations.

Principle of Development

6.2 The general thrust of national and local planning policy and guidance is to secure sustainable patterns of development and regeneration through the efficient re-use of previously developed urban land, and through concentrating development in accessible locations which are well served by jobs, services and facilities. As highlighted, the site is an under-utilised brownfield site within a highly accessible location which is well served by public transport and an extensive range of employment opportunities and town centre services and facilities. The site is therefore considered highly sustainable and is a location where development should be concentrated.

6.3 In evidence of the above, the site has been earmarked by the Council for redevelopment within various planning policy documents for almost 20 years, first being allocated within the adopted Local Plan in 2005. Within the current District Plan the site is covered by the wider Welwyn Garden City Town Centre 'New Housing Development' designation which identifies this wider area as being capable of delivering around 50 residential dwellings. The site itself is allocated within the District Plan for mixed-use development comprising retail, office and residential uses. No quantum is specified for any of the uses.

6.4 Within the emerging Local Plan the Council is proposing to replace the 'New Housing Development' designation and the 'Development Site' allocation with the District Plan with a new 'Other Key Site' allocation for the site (Ref. SADM21). This identifies the site as being suitable for residential development with an indicative capacity stated of 250 dwellings. This proposed allocation is also reflected within the Council's WGC 2120 Strategic Planning Framework which sets out the Council's vision and strategy for the site (and four other key opportunity sites within the northern part of the town centre).

6.5 The emerging Local Plan's Spatial Vision acknowledges the need to provide for 12,000 new homes on a range of sites, two thirds of which will be built within and adjoining Welwyn Garden City and Hatfield. In summary, the objective of the emerging LP is *"to provide for the borough's development needs over the plan period by maintaining the existing settlement pattern, in order to protect areas of high environmental value, prevent coalescence of towns and villages, and to protect the Green Belt. To do this, the LP seeks to direct the majority of new development to the main towns where it can be supported by appropriate infrastructure, the need to travel is minimised, and opportunities for redevelopment of previously developed land are maximised."*

- 6.6 The redevelopment of the site provides an opportunity to create a new, high-quality residential quarter within the centre of Welwyn Garden City. The proposals would be in accordance with both the historic and emerging site allocations, the general thrust of National planning policy, and the Spatial Vision of the emerging Local Plan – all of which seek to prioritize development in previously developed sustainable locations, in order to alleviate the need for development in other areas of higher environmental value.
- 6.7 The site is previously developed land within a highly sustainable location in close proximity to the railway station and the amenities of the town centre. The site's existing use is considered to be inefficient given the overall size and more generally it is an unproductive use of such a centrally located site. With reference to the stated objectives of the Local Plan, and as the NPPF advocates, planning authorities should give substantial weight to the value of re-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 where land supply is constrained and available sites could be used more effectively. This is particularly relevant in Welwyn Hatfield where housing land supply is constrained by Green Belt. The NPPF specifically identifies car parks as an example of the sorts of sites which should be used more efficiently.

Reduction in Car Parking

- 6.8 The redevelopment of the site will result in the loss of 584 car parking spaces (long stay and weekend only). The car parking spaces are used by town centre users and staff at the Council offices. The existing use is not a priority land use that is desirable to protect, therefore the Council has allocated the site for development in both the adopted and emerging Local Plans in order to encourage its development. Therefore it is recognised that there is in principle support for the reduction in car parking that would result.
- 6.9 Facilitating the site's development enables an overall parking rationalization exercise to be achieved. Therefore, additional car parking is being provided at the Campus West site (identified for an approximate increase of 180 to 360 spaces), as well as the redevelopment and extension of Hunters Bridge car park (identified for an approximate increase of 0 to 270 spaces). This strategy is set out within the Council's WGC 2120 Strategic Planning Framework. To facilitate the development of the Campus East site, the Council has granted planning permission to expand the existing Campus West car park by 156 spaces (reference: 6/2021/2207/MAJ). The Transport Statement submitted with the Campus West application confirmed that the Campus East Car Park is primarily being used by permit holders (Welwyn Hatfield Borough Council staff and commercial uses) and is currently underutilised by people visiting the town centre.

6.10 The officer's report to planning committee stated that *"the proposed development which forms the basis of this application would consolidate and replace car parking from elsewhere in the town centre, with the aim of freeing up the Campus East site for residential development which would help towards addressing the borough's shortfall in housing supply. This would also contribute towards the delivery of the town centre strategy as set out in the Local Plan"* and that *"the expansion of parking on this site would enable a proposed housing development at Campus East, as part of the wider Town Centre proposals. These developments would bring significant benefit to the town centre and the town more generally and help implement the town centre strategy as set out in the Plan."*

6.11 Given the above, the principle of removing the existing car parking provision at Campus East is both desirable and acceptable and accords with both national and local planning policy, and the objectives of the Council's regeneration strategy.

Provision of Housing

6.12 As mentioned both national and local planning policy seeks to secure sustainable patterns of development and regeneration through the efficient re-use of previously developed urban land, and through concentrating development in accessible locations which are well served by jobs, services and facilities. As highlighted, the site is an under-utilised brownfield site within a highly accessible location which is well served by public transport and an extensive range of employment opportunities and town centre services and facilities. The site is therefore considered highly sustainable and is a location where new housing development should be prioritised and concentrated.

6.13 Although the site is allocated within the adopted Local Plan for development including residential development, and does not fall to be considered a windfall site, it is relevant to highlight that Policy H2 (Location of Windfall Residential Development) provides a list of site characteristics against which windfall development will be assessed against. Being previously developed land, accessible to local services and facilities by transport modes other than by car, the site would satisfy these criteria.

6.14 In accordance with the above, the emerging Local Plan's Spatial Vision acknowledges the need to provide for 12,000 new homes on a range of sites, two thirds of which will be built within and adjoining Welwyn Garden City and Hatfield. It is important to recognise however, that even the provision of this number of homes would not address the Full Objectively Assessed Housing Need (FOAHN) housing figure of 15,200, and this only serves to highlight the importance that the site is developed for housing. The site is allocated for residential development within the emerging Local Plan, therefore, the site's redevelopment is plan-led, in accordance with national and local planning policy, and not in dispute.



Approach to Residential Dwelling Mix

- 6.15 Within the context of boosting the supply of homes, Paragraph 62 of the NPPF states that the size, type and tenure of housing needed for different groups in the community should be reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities and people who rent their homes).
- 6.16 At the local level, the current District Plan Policy H8 states that the Council will expect new residential developments to incorporate a range of dwelling types and sizes, where appropriate. The Council will expect a mix of dwelling types in developments to reflect the shortfall of flats, bedsits and one and two bedroom properties in the district. Dwellings of different tenure should be mixed on site to avoid the creation of large areas of housing with similar characteristics.
- 6.17 Within the emerging Local Plan, Policy SP7 states that proposals for new dwellings should demonstrate how the mix of tenure, type and size of housing proposed on sites has had regard to the Council's latest evidence of housing need and market demand and contribute towards meeting the varied needs of different households including single person households, couples, families with children, older people, people with disabilities and people wishing to build their own homes. For larger sites, there should be a greater opportunity to deliver a broader mix.
- 6.18 The emerging Local Plan includes the following tables which it states are not intended to perform as a prescriptive policy requirement but such indicators should be taken into account when submitting a planning application and in decision making.

Table 6.1: Estimated size and type of all new housing required (Emerging Local Plan)

Studio / small 1 bed flat	2 bed flat / smallhouse	2 bed or small 3 bed family house	3 bed or small 4 bed family house	Larger 4 bed +family house
11%	26%	30%	14%	20%

Table 6.2: Total proposed residential mix proposed (Bellway Homes application)

Studio / 1bed flat	2 bed flat	3 bed flat
116 (37%)	183 (58.5%)	14 (4.5%)

- 6.19 Whilst the scheme has had regard to the council's target mix of accommodation contained within the emerging Local Plan (Policy SP7), it should be recognised that this represents the proportion of each new housing type required across the entire district area, not the required mix on each individual site, and therefore the target mix should not be applied mechanistically to every individual residential development.
- 6.20 The site, due to its location and other characteristics, is naturally more suited to an flatted scheme, which would contain dwellings with a smaller number of bedrooms. Various market factors also mean that flats are naturally more desired in such locations. In contrast, other sites outside of the town centre area will naturally be more suited to providing individual dwelling houses containing a greater number of bedrooms and increased car parking, which are more suitable for families. Flats and houses are desired by the market in these areas.
- 6.21 Regard has also been had to other considerations including, the imperative to optimise the site's redevelopment potential in line with the emerging site allocation which requires the provision of at least 250 dwellings overall, the site's constraints which have influenced the approach to layout, siting, massing and height, local housing demand and affordability criteria, and the site's town centre location which is likely to be prioritised by persons seeking town centre living, and easy reach of the railway station for commuting. The mix of dwellings proposed will assist in creating a mixed and balanced community across the Council area, meeting identified local needs in accordance with Policy H8 and SP7 of the adopted and emerging Local Plans.

Approach to Site Layout, Height and Density (inc. Heritage & Townscape)

- 6.22 The site has an irregular shape but towards the north it becomes more linear with a strong north to south emphasis. The orientation of the proposed blocks predominantly follows this emphasis, a principle which was established within the WGC 2120 Framework document and repeated in Bellway's bid scheme. As the emerging design was tested and developed further, it became clear the most efficient way to arrange the site's development is via a series of linear blocks around a central green space.
- 6.23 Whilst the NPPF does not set out any prescriptive guidance with regards to residential density, it supports development that makes efficient use of land, taking into account:
- a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;
 - b) local market conditions and viability;
 - c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;
 - d) the desirability of maintaining an area's prevailing character and setting, or of promoting regeneration and change; and
 - e) the importance of securing well-designed, attractive and healthy places.

- 6.24 A design-led approach has been taken from the outset in developing the proposed scheme for the site. This involved a detailed analysis and evaluation of the site and the local area, taking into account its natural opportunities and constraints, and the surrounding context and character. The layout, scale and massing have all been developed as a result of this detailed analysis and are considered appropriate to the site and surrounding area. The iterative design evolution has also taken into consideration the impact of the proposals on the amenity of the site's neighbours and the environment.
- 6.25 The site has an area of 2.11 hectares and the proposed scheme contains 313 dwellings, with a resultant residential density of 148 dwellings per hectare. The density is appropriate upon this site given its sustainable town centre location and characteristics. It is important that the site's density is appropriately optimised, to ensure that the development capacity of the site is not wasted either through under-developing the site, or through inefficient development. For this reason and given the site's allocation for a significant number of dwellings, the scheme is entirely flatted which achieves a more efficient development, and an appropriate residential density.
- 6.26 Policy H6 (Densities) of the adopted Local Plan provides 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 Whilst the proposed number of residential dwellings proposed is greater than the figures quoted within both the Council's WGC 2120 Framework and the emerging Local Plan site allocation (280 and 250 dwellings respectively), these figures are given as indicative figures and should be viewed as targets, not limits. In both cases we have established they were based on high level capacity studies which we consider have given rise to conservative figures which fail to appropriately optimise the development capacity of the site. In the context of planning policies (such as Policy H6 above), which seek to prioritise the redevelopment of previously developed land in sustainable locations first, combined with the limited amount of housing land supply, it would be perverse to think that the figures were intended to be interpreted in this way.
- 6.28 Whilst the site is currently low-rise by the nature of its existing use, the site layout and orientation of buildings also responds to the fact that this site will mediate, or has the potential to provide a transition, between the area immediately to the south, where there are a number of taller, larger format buildings, and the area to the north, which is characterised by more domestically scaled residential terraces and pairs of semi-detached houses around Gresley Close. In recognition of this context Buildings A and B, the largest buildings, are both taller and larger in footprint than Building C/D, and the northern end of Building E/F which steps down at the northern-most point of the site.

- 6.29 The approach to scheme height is explained within the Design & Access Statement. The scheme height is varied taking into account various different factors including the need to optimise residential density whilst ensuring the scheme does not give rise to any unneighborly impacts. The scheme's taller buildings located at the southern end of the site include residential accommodation at ground level and four storeys above.
- 6.30 As the scheme design has developed it has always included a number of roofs above which there are 'false' mansards, primarily for aesthetic reasons, in recognition that this is an existing feature of Welwyn Garden City's architectural character, but also for practical reasons in order to screen rooftop plant and solar panels. This design approach has been endorsed by the LPA and their design and conservation consultees via various meeting discussions, and separate discussions with various stakeholders.
- 6.31 In earlier design discussions and pre-application meetings, Building A included a 'false mansard'. On Building A, in order to further optimise the scheme's efficiency and in response to various other market factors such as rising construction costs, the decision has been taken to replace the false mansard with a true mansard and include a small number of residential dwellings within the roof space of Building A. Whilst there would be no overall increase in the height of Building A through this approach, it would enable additional units of accommodation to be provided, thereby optimizing the site's density further and ensuring the site makes an even greater contribution to the Council's housing land supply.
- 6.32 The submitted Heritage, Townscape and Visual Impact Assessment (HTVIA) considers the height, scale and massing of the whole development through the assessment of a number of views at locations within the surrounding context of the site. The views which have been assessed were jointly selected, discussed and agreed with the LPA and their design and conservation consultees at an early stage in the application process. The findings of the HTVIA are that in the case of all selected views, the proposed development would either have no impact on the significance of nearby heritage assets or that it would contribute positively to the setting and significance of these assets. As such, the scheme's height, scale and massing, and the scheme's resultant impacts upon the townscape and nearby heritage assets, are considered to be acceptable.

Quality of Residential Accommodation

- 6.33 All 313 dwellings proposed either achieve or exceed the Nationally Described Space Standards (NDSS). The proposed development will provide high quality residential accommodation and an appropriate level of residential amenity to future occupiers. In designing the proposed residential buildings, specific attention has been given to the requirements of relevant planning policies within the Local Plan, achievement of compliance with Building Regulations and other technical and regulatory standards. This is summarised below.
- 6.34 Emerging policy SADM 11 requires that all proposals create and protect a good standard of amenity for buildings and external open space and in particular should ensure dwellings are dual aspect to enable passive ventilation and avoid the need for mechanical ventilation, subject to any noise and air pollution mitigation measures that are required to make the proposal acceptable.

Outlook

- 6.35 The approach to site layout explained above results in the majority of the blocks having longer eastern and western facades, as such the majority of dwellings also face either east or west, or southwards. The dwellings benefit from these orientations and many have dual or even triple aspects. The majority of dwellings within the scheme either face the central green 'spine' or another area of outdoor amenity space.
- 6.36 Due to the site's shape and the resultant site layout, whilst a small number of dwellings inevitably face northwards, the scheme design has been refined several times to minimize the number of single-aspect north facing dwellings to the absolute minimum number of units where it is simply not possible to design out this issue any further.

Amenity Space

- 6.37 Adopted planning policy in the form of the council's Supplementary Design Guidance, requires that all residential development should incorporate private open space for the use of residents. It recognizes that in flats the private open space is likely to be in the form of communal amenity areas. Emerging planning Policy SADM 11 requires that all proposals will be required to create and protect a good standard of amenity for buildings and external open space in line with the Council's Supplementary Design Guidance, and in particular should ensure external private or communal garden space, in its extent and design, meets the reasonable needs of its users. There is no policy standard per dwelling or occupier in either the adopted or emerging planning policy requirements.
- 6.38 The scheme includes significant areas of communal outdoor amenity space, both to the front (south) of Buildings A and B, through the central area of the site in the form of a 'green spine', and in a podium area within Building A. These are areas which benefit from natural surveillance and receive good levels of daylight and sunlight all year round. In addition to these communal areas, the majority of dwellings also benefit from private amenity space in the form of balconies. Whilst there are no prescriptive standards within planning policy the development should achieve, the scheme clearly provides a significant amount of amenity space, despite the lower expectation that potential occupiers may have, when choosing to live within the town centre.
- 6.39 Furthermore, there is good access to local open space within walking distance, such as Sherrardspark Wood. The amount of amenity space within the scheme has been increased through the pre-application engagement process, by reducing the extent of internal roads in favour of shared surface areas. The proposals therefore accord with the council's Supplementary Design Guidance and emerging planning policy SADM 11 with regards to amenity space.

Daylight & Sunlight

- 6.40 As described, the site's development potential has been appropriately optimised in order to ensure the capacity of the site to provide homes is not wasted through inefficient design or underutilization of the site area. The scheme results in a density of 148 dwellings per hectare which is considered appropriate in this location. It has been demonstrated that the scheme contains a significant amount of amenity space for the enjoyment of residents.
- 6.41 Another measure of whether the scale of development and scheme density is appropriate, is the scheme's compliance with published Daylight, Sunlight and Overshadowing guidance (Building Research Establishment), and emerging Policy SADM 11 which requires: that *"All proposals ... create and protect a good standard of amenity for buildings and external open space in line with the Council's Supplementary Design Guidance, and in particular should ensure: ... The levels of sunlight and daylight within buildings and open spaces, and garden areas in particular, are satisfactory."* The scheme has been tested for compliance in relation to its impact upon surrounding buildings, and the level of internal compliance and the impacts are described within the submitted Daylight & Sunlight Report.
- 6.42 In terms of the scheme impact upon surrounding buildings, the Report summarises that whilst there will be some reductions to individual windows, the amount of daylight received to almost all of the neighbouring habitable rooms will remain very high and in excess of the BRE criteria. The single deviation from the targets affects the ground floor rooms which sits beneath a large wooden canopy thus already limiting light from the sky. The assessment of sunlight to neighbouring windows has also shown a very high level of compliance with the BRE criteria, which is considered acceptable, particularly since the BRE guidance should be applied flexibly, and impacts upon surrounding buildings are inevitable if the site, which currently contains very low-rise buildings, is to be meaningfully developed, per the requirements of planning policy and the site allocation.
- 6.43 In terms of measuring the scheme's level of internal compliance, it is important to acknowledge that the relevant national guidance recently changed through the introduction of the new BRE guidance in 2022, replacing the previous guidance that dated to 2011. The BRE guidance changed late in the scheme's development, therefore the scheme was being designed and tested against the former guidance, but is now measured against the revised guidance. The results of the scheme when measured against both the 2011 and the 2022 guidance are provided, to demonstrate that the scheme is not materially worse as a result, but that the 'goalposts have moved' in terms of assessment criteria.

- 6.44 In terms of daylight, when measured against the recently adopted 2022 BRE targets, 76% of the proposed habitable rooms will meet or exceed the target. This is a high level of compliance against the recently introduced targets and reflects the high quality of the scheme design. Where units fall below this level, they are deeper spaces with windows overhung by balconies that provide private amenity space and this reflects the balance in the two design priorities the design team have sought to strike at the right level. When compared against the former BRE 2011 Average Daylight Factor test, the comparative assessment shows a compliance rate of 95% which is considered to be excellent for a scheme of this nature.
- 6.45 In terms of sunlight, whilst direct sunlight levels are more orientation specific, 85% of the units have a habitable room that will achieve at least 1.5 hours of sunlight on the 21st of March and therefore meet the 2022 BBE targets. Again, this is considered to be a very good level of compliance. Overall, the daylight and sunlight results within the proposed scheme indicate a high level of overall compliance and show that through careful design the scheme will deliver high-quality accommodation with very good levels of internal amenity.
- 6.46 The assessment of sunlight to the proposed outdoor amenity areas has shown that the majority of the shared communal areas will meet the BRE recommendations achieving at least 2 hours sunlight on the 21st of March. Whilst the courtyard serving Block A will fall below the target in March, it will enjoy 2 hours of sunlight to well over 50% of the space on 21st June when the space will be enjoyed more regularly. The results of this assessment confirm that the courtyard space will enjoy at least 2 hours of sunlight on the 21st June to 73% of the area affording residents the opportunity to enjoy private, well sunlight amenity space in the summer.
- 6.47 In assessing the above results, the levels of compliance recently shown by comparative schemes within the Council area should be borne in mind. At the BioPark, a scheme for a similar number of dwellings (289 dwellings), which was measured under the previous 2011 BRE guidance, their results indicate that 422 (93%) of the 455 habitable rooms tested would meet or exceed the BRE guidelines. This is very similar, albeit slightly below, the level of compliance (ADF results) within the Campus East scheme when measured against the same guidance, where we are recording a 95% ADF compliance rate.
- 6.48 In comparison to the planning permission at the Shredded Wheat factory site (6/2021/0671/MAJ) where permission was granted for another comparable number of dwellings, (317 dwellings), the level of compliance showed that 89.4% of proposed rooms would meet or exceed the recommended ADF target levels under the 2011 guidance. In comparison, Campus East, when measured against the same 2011 BRE guidance, achieves 95% compliance. These comparisons further demonstrate that the scheme is acceptable.

Noise & Overheating

- 6.49 Achieving the levels of daylight and sunlight compliance described above, has been directly linked to the scheme's approach to two other design considerations – noise and overheating. Again, whilst the scheme was under design development, the relevant standards in this area changed as a result of the introduction of Building Regulations Part O, which requires noise and overheating to be considered as a combined issue. The scheme's approach to addressing noise & overheating criteria, in order to ensure that an appropriate level of amenity to the dwellings is provided, has been a key matter which has been discussed at length with the Council during the pre-application engagement. In particular, Bellway have undertaken a substantial amount of design development and testing in order to provide the Council with assurances that the scheme's approach is appropriate, including the submission of a full Noise & Vibration Assessment during the pre-application stage.
- 6.50 To summarise, the majority of the site is subject to reasonably high ambient noise levels as a result of noise from road and rail sources. This baseline noise environment means that noise mitigation is required to the majority of the units within the scheme in order to ensure a suitable residential environment is achieved internally. To be absolutely clear, mitigation is required due to the ambient noise environment, and therefore will be provided in any case, regardless of the individual noise source affecting any one dwelling.
- 6.51 In addition to the ambient noise environment, commercial noise from the nearby Waitrose servicing yard has also been given particular consideration. When the Council granted planning permission for the reconfiguration of the service yard, it unfortunately did not apply any restrictions upon the service yard, in terms of hours of operation or requiring any noise mitigation measures such as acoustic screening. This is now unfortunate because whilst the servicing yard has historically been located adjacent to a surface car park, the site has been identified as a suitable residential development site for some time.
- 6.52 When the additional commercial noise from the Waitrose servicing yard is also factored in to the scheme's assessment, a small number of additional units within the residential blocks which have a direct line of sight of the service yard require noise mitigation also as a result of the noise from this commercial premises (3.8% of the total number of units, and 4% of the total number of bedrooms). However, regardless of the source of noise, the mitigation proposed is the same for all the residential units, where it is needed, across the scheme.
- 6.53 Under the agent of change principle, the proposed development must mitigate against the existing noise source, rather than the other way round. Bellway and its design and technical team have followed the noise mitigation hierarchy. Significant consideration has been given to scheme's enhanced acoustic design and other methods of noise mitigation in arriving at the proposed solution for the scheme. Alternatives which have been considered include the options within the following hierarchy:

- 6.54 **Reducing noise at source.** The noise sources are off-site and outside the control of the applicant. Noise from road and rail sources, which characterises the prevailing noise environment across the site cannot be removed. Noise from the Waitrose servicing yard cannot be removed without building over and enclosing the service yard, or changing the nature of the commercial operation. For obvious reasons it is not considered realistic that Waitrose would entertain any requests that disrupt their established business operations. This would also go against the Agent of Change principle.
- 6.55 **Providing buffer zones to limit noise exposure.** Sound energy naturally decreases with increasing distance from the source. Noise from the Waitrose servicing yard has been estimated to extend approximately 150m from the noise source, if unobstructed. Avoiding any form of development in this zone would render the majority of the site undevelopable. On the contrary, the proposed buildings closest to the noise source provide acoustic barriers that benefit the remainder of the site.
- 6.56 **Reducing the noise pathway through the use of acoustic barriers.** The use of noise bunds or acoustic fencing closest to the Waitrose servicing yard would be impractical unless the structures were very tall. Such features are typically suitable on greenfield sites adjacent to main roads. They are not suited to a denser urban environment. Any benefit from these would be restricted to the protection of units on lower floors only, unless the structures were very tall. Such measures are therefore considered impractical and unacceptable on design and conservation grounds.
- 6.57 **Use of barrier blocks to limit noise travel.** It is also possible to limit noise travel through the spacing and massing of buildings along the boundaries with adjacent noise sources to help act as “barrier blocks”, (i.e. using building themselves to provide acoustic screening). The most benefit can be achieved where buildings are orientated “parallel” to the noise sources to be protected against. The proposed scheme layout adopts this approach such that buildings A and B protect the rest of the blocks from the noise travel.
- 6.58 **Orientation of units and more sensitive habitable rooms.** The orientation of individual units and the internal arrangement of the proposed buildings which are closest to the Waitrose servicing yard has been considered. For example, Building A features an internal courtyard space which is enclosed by the surrounding perimeter block. The floorplans have been optimised to minimise the number of more sensitive habitable rooms (i.e. bedrooms) that face the noise source. Where possible these face into the courtyard, with less sensitive kitchen/living/dining rooms facing the service yard. An extensive design exercise has demonstrated that further optimisation would result in the loss of residential units and/or adverse amendments to the housing mix as part of the reconfiguration of the current scheme with inevitable adverse cost consequences. There are also other adverse consequences which would worsen the scheme and threaten its deliverability.

- 6.59 **Providing appropriate sound insulation through facade mitigation.** Noise intrusion into dwellings can be controlled through the appropriate specification of external building fabric elements, with windows normally being the “weakest” component. However it is important to recognise that sound insulation of windows is unachievable where windows are open. As such, where properties cannot achieve acceptable internal noise levels (with windows open), properties should be provided with appropriate alternative means of ventilation, such as that proposed. Bellway have also considered acoustic louvres and other window systems with convoluted air pathways. These have been dismissed on various grounds including the inevitable compromise to the scheme’s design aesthetics, the site’s location within the Conservation Area, and disproportionate scheme costs.
- 6.60 To summarise, it has been demonstrated through the above commentary that the proposed scheme layout has been masterplanned having due regard to good acoustic design principles and includes embedded mitigation which helps to minimise the impact of the existing noise environment on the proposed residential development. However it should also be recognised that the noise environment is not the only factor which has influenced the layout of the proposed scheme, which is required to respond to other competing demands and requirements.
- 6.61 The preferred solution that has been arrived at is to provide enhanced performance glazing, alongside Mechanical Ventilation with Heat Recovery (MVHR). This would ensure that when windows are closed, the internal noise level within the affected units would be appropriate, and the units would not overheat. However windows would not be fixed shut, thus providing the future occupier with a choice. Additionally, a resident information pack that makes purchasers aware of the noise environment and explains how the mitigation should be properly used will be provided and this can be conditioned within the planning permission. The proposed solution is a common approach which is accepted elsewhere in dense urban environments.
- 6.62 The Council’s concern to date relates to the impact of the Waitrose service yard on bedrooms at night (i.e. the most sensitive period). Bellway have analysed the number of bedrooms within the scheme which require mitigation against the noise from the Waitrose service yard when the baseline noise environment is also taken into account, which is the truest representation of the actual noise environment that will be experienced. Under this scenario, only an extremely small number of units, or bedrooms, within the scheme are affected and require mitigation specifically due to the service yard noise. The proposed mitigation strategy would ensure this very small number of units, alongside all others, experience a suitable level of residential amenity when windows are closed and MVHR is provided. The occupiers of the units have access to other rooms including, where the unit is dual aspect, those facing away from the noise sources.
- 6.63 All residents would receive a resident information pack that makes them aware of the noise environment and explains how the mitigation should be used. This requirement can be secured by planning condition and it is an approach reflected within NPPG, which states that “*it can be helpful for developers to provide information to prospective purchasers or occupants about mitigation measures that have been put in place, to raise awareness and reduce the risk of post-purchase/occupancy complaints.*”

- 6.64 Linked to the above consideration of noise, is the scheme response to overheating. During pre-application discussions, a sample of the 'worst case' apartments was selected and shared with the Council, which demonstrated that despite being the 'worst case' units, these would all achieve the Building Regulation requirements for overheating. On this basis, the remainder of the scheme will comply with the criteria also based on the scheme's technical modelling. The whole of the scheme would therefore achieve Building Regulation requirements.
- 6.65 In summary the scheme has been designed to address daylight & sunlight, noise and overheating considerations in equal measure, to ensure that an appropriate balance is struck between all three, to achieve technical compliance in all areas. This has included consideration of the orientation, height and massing of the proposed buildings, the internal layout of individual apartments including the positioning of habitable and non-habitable rooms, the provision of balconies to windows, and the size and positioning of individual windows. The proposed scheme achieves technical compliance in all considerations, and an appropriate level of residential amenity will be provided to all dwellings. Please refer to the submitted, Daylight & Sunlight, Noise & Vibration, and Overheating Assessment for further details.

Accessibility

- 6.66 Within the emerging Local Plan, Policy SP7 requires at least 30% of all new dwellings on sites involving 5 or more dwellings to meet Building Regulations Part M4(2) (accessible and adaptable dwellings) and at least 1.5% of all new dwellings on sites involving 50 or more dwellings to meet Building Regulations Part M4(3) (wheelchair user dwellings). For both M4(2) and M4(3) provision will be rounded up to the nearest whole number.
- 6.67 All of the dwellings, (313) within the proposed development have been designed to comply with Building Regulations M4(2), thereby exceeding the policy requirement significantly, whilst 3 of the proposed dwellings (1.0%) have been designed to comply with Building Regulations M4(3). Therefore whilst the proposals significantly exceed the requirements of Policy SP7 of the emerging Local Plan with regards to M4(2) dwellings accessible and adaptable dwellings, the provision of M4(3) wheelchair user dwellings is slightly below standard. On balance, this is considered acceptable given the substantial over-provision in M4(2) dwellings that are accessible and adaptable, which could readily be converted to enable future use by wheelchair occupiers if demand arises.

Air Quality

- 6.68 Under the adopted Local Plan Policy R18 'Air Quality states the following: *"The Council will have regard to the potential effects of a development on local air quality when determining planning applications. Consideration will be given to both the operational characteristics of the development and to the traffic generated by it. Any development within areas designated as Air Quality Management Areas must have regard to guidelines for ensuring air quality is maintained at acceptable levels as set out in the Air Quality Strategy."*
- 6.69 The potential air quality impacts associated with the proposed residential development at the Campus East Site, in the Council area have been assessed. There is the potential for dust and PM10 impacts during the demolition and construction phase. However, with the proposed mitigation measures in place, the overall residual effect will be 'not significant'. Taking into consideration anticipated volumes of demolition and construction traffic, the maximum duration of the demolition and construction phase and the anticipated implementation of a CEMP, it is judged that the overall effects of emissions from development-generated demolition and construction traffic on existing sensitive human and ecological receptors are likely to be 'not significant'.
- 6.70 The impacts of operational traffic generation associated with the proposed development have been considered and are anticipated to fall below the relevant screening criteria. As such, the overall effect of development-generated traffic on existing sensitive human and ecological receptors will be 'not significant'. The impact of pollutant concentrations within the Site on future residents of the proposed development has been qualitatively assessed. Taking into consideration the proximity of the development Site to nearby emission sources, the proposed development layout and baseline air quality conditions within the Site and in the local area, it is anticipated that pollutant concentrations at sensitive locations within the proposed development will be well below the relevant objectives. As such, it is judged that new residents of the proposed development will experience good air quality and the Site is, therefore, suitable for its proposed end-use.
- 6.71 Overall, there are no air quality constraints to the proposed development which is in accordance with local, regional and national policy and guidance.

Approach to Ecology, Biodiversity & Arboriculture

Ecology

- 6.72 Policy R11 of the adopted Local Plan – Biodiversity and Development states that *‘All new development will be required to demonstrate how it would contribute positively to the biodiversity of the site by; i. The retention and enhancement of the natural features of the site; ii. The promotion of natural areas and wildlife corridors where appropriate as part of the design; iii. The translocation of habitats where necessary, where it can be demonstrated that the habitat or species concerned cannot be successfully accommodated within the development; iv. The use of locally native species in planting in accordance with Policy D8 Landscaping; v. Helping meet priorities/targets set out in the Local Biodiversity Action Plan.’*
- 6.73 In addition, Policy R17 – Trees, Woodland and Hedgerows states that *‘The Council will seek the protection and retention of existing trees, hedgerows and woodland by the use of planning conditions, section 106 agreements, hedgerow retention notices and tree preservation orders where applicable. New development will be required to incorporate wherever appropriate new planting with locally native species and should be in accordance with Policy D8 Landscaping.’*
- 6.74 An Ecological Appraisal is submitted with the planning application which is based on the results of a desktop study, Phase 1 habitat survey and detailed protected species surveys. The available information confirms that no statutory or non-statutory nature conservation designations are present within or adjacent to the site, and none of the designations within the surrounding area are likely to be adversely affected by the proposals.
- 6.75 The Phase 1 habitat survey has established that the site is dominated by habitats not considered to be of ecological importance. The proposals have retained the majority of features of greatest relative value, such as hedgerows and trees, whilst small losses will be compensated for through new landscape planting and habitat creation.
- 6.76 The habitats within the site have the potential to support several protected species, including species protected under both national and European legislation. Accordingly, a number of mitigation measures have been proposed to minimise the risk of harm to protected species, with compensatory measures proposed, where appropriate, in order to maintain the conservation status of local populations.
- 6.77 In conclusion, the proposals have sought to minimise impacts and subject to the implementation of appropriate avoidance, mitigation and compensation measures, it is considered unlikely that the proposals will result in significant harm to biodiversity. On the contrary, the opportunity exists to provide a number of biodiversity net gains as part of the proposals.

Biodiversity

6.78 In advance of the Environmental Act (2021) mandating national requirements, the National Planning Policy Framework requires biodiversity net gain to be achieved. It is currently held that a net gain of 1% satisfies the requirements of the NPPF. In addition, Policy R11 of the adopted Local Plan states that '*All new development will be required to demonstrate how it would contribute positively to the biodiversity of the site...*'

6.79 A Biodiversity Net Gain assessment is provided within the application which demonstrates that there would be a net gain of 34% in Habitat units, and a net loss of 37% in hedgerow units. Although the new hedgerow planting proposed will not offset this loss, the extensive native shrub planting at the north western boundary of the site will in effect provide an equivalent linear feature, albeit more than 5m wide in places.

Arboriculture

6.80 There are 105 trees of individual distinction and 8 groups of trees recorded within the tree survey. Trees within influence of the application area are a mix of low to high arboricultural interest, varying in quality and arboricultural interest comprising all BS5837 categories. The extant tree cover is largely confined to the site's boundaries with a number of additional trees and groups set within amenity areas of soft landscaping providing separation between the parking bays or adjacent to the entrance to the car park.

6.81 In total, 31 individual trees are proposed to be removed to facilitate the site's development. None of these are Category A trees, with the majority being Category C, and Category B trees. The removal of these trees is unavoidable and are necessary if the site is to be developed at a meaningful density, per the site allocation. By way of compensation the scheme includes the introduction of a significant number of new trees within areas of public open space and throughout areas of soft landscaping within the site.

Energy & Sustainability

6.82 The NPPF encourages local planning authorities to adopt proactive strategies to mitigate and adapt to climate change. At the local level, Policy R3 of the adopted District Plan states that the Council will expect all development to include measures to maximise energy conservation through the design of buildings, site layout and provision of landscaping; and incorporate the Best Practice Environmental Option (BPEO) for energy supply. Within the emerging Local Plan, Policy SADM13 states that all major development proposals must demonstrate that they have sought to maximise opportunities for renewable and low carbon sources of energy supply.

- 6.83 The supporting text to SADM13 states that the Council will expect all development proposals to reflect the following Energy Hierarchy: 'Use less energy'; 'Supply energy efficiently'; and 'Renewable and low carbon energy'. Emerging Policy SADM13, which will replace the existing policy upon adoption of the New Local Plan doesn't set a specific carbon reduction target, either overall or for specific steps in the hierarchy. Emerging policy requires 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.
- 6.84 Bellway are committed to ensuring the Campus East development is as sustainable as possible. The development's Target Emission Rate (TER) has been calculated to establish the minimum on-site standard for energy reduction that would be necessary to comply with Building Regulations. The resulting TER has been calculated as 234,936 kg/CO₂ per annum. To ensure compliance with ADL 2021 (Building Regulations), the scheme's CO₂ emissions should not exceed this figure. It should be noted that ADL 2021 figure represents a 31% uplift in performance over ADL 2013.
- 6.85 Bellway have then sought to go further than the Building Regulations requirements through reducing energy demand, and promoting low carbon and renewable energy technologies. Bellway have adopted a fabric first approach through the following design measures which will reduce the scheme's energy demand:
- Energy-efficient building fabric and insulation to all heat loss floors, walls and roofs.
 - High-efficiency double-glazed windows throughout.
 - Quality of build will be confirmed by achieving good air-tightness results throughout.
 - Efficient-building services including high-efficiency heating systems.
 - Low-energy lighting throughout the building.
- 6.86 The low-carbon and renewable energy solutions applicable to this development scheme have also been assessed and potentially viable solutions are proposed. The technologies deemed feasible are solar thermal, solar PV and aerothermal. Wind, Geothermal and Biomass have been ruled out as not being viable solutions. The total calculated CO₂ emissions for the scheme after energy reduction measures and low-carbon and renewable technologies have been considered is 54,385 kg/CO₂ per annum, which is a reduction of 76.85% or 180,551 kg/CO₂ per annum over the ADL 2021 baseline TER emissions.
- 6.87 The water consumption of a dwelling has a significant impact on not only direct operational running costs (i.e., water consumption charges), but also indirectly through additional energy usage and the heating of water for domestic use. The required planning policy standard of 110 litres of water per person per day will be met also. The scheme also addresses other sustainability objectives in compliance with planning policy. These are explained within the submitted Energy & Sustainability Strategy.

Transport & Highways

- 6.88 It has been demonstrated within this Planning Statement that the reduction in the number of existing car parking spaces to facilitate the site's redevelopment is both acceptable and desirable from a planning policy perspective. The acceptability of the proposed developments effects upon transport and highways will now be summarised also.
- 6.89 The scheme involves the erection of five buildings to provide 313 dwellings. In terms of relevant planning policy, the Council's "Supplementary Planning Guidance Parking Standards (Adopted 2004)" has been reviewed with regards to on-site parking. It should be noted that the above parking standards are now treated as guidelines rather than minimum or maximum standards. To provide a more robust method of assessment, car ownership statistics from the most recent census (2011) have been obtained for the Handside ward in which the development is situated and is therefore considered representative.
- 6.90 Based on this data, it can be calculated that car ownership for owned flats, maisonette or apartments within the surrounding area to be approximately 0.58 cars/vans per one and two-bed flat and 0.66 cars/vans per three bed flat. The car ownership level for shared-ownership flats, maisonette or apartments within the surrounding area is approximately 0.42 cars/vans per one and two bed flat. Applying these figures to the proposed 313 units development equates to a potential maximum demand of 168 cars.
- 6.91 With regards to the above information, the proposals seek to provide 183 parking spaces for the 313 residential units which is within planning policy standards and above the expected level of demand for spaces based upon local car ownership data. The level of provision would equate to a ratio of 0.58 parking spaces per unit. Considering the site is located in close proximity to existing bus stops on The Campus and Bridge Road, local amenities such as Waitrose and The Howard Centre, Welwyn Garden City Railway Station, educational and employment opportunities, it is considered that the level of provision is appropriate in this instance and will help to minimise demand for travel by private motor vehicle.
- 6.92 Of the 183 car parking spaces to be provided, 92 spaces will be fitted with Active Electric Vehicle Charging Points. The proposals also include one car club space, with the potential for two further spaces to be provided should demand prove this is necessary. Correspondence with Enterprise Car Club has been made who have submitted a letter of support indicating they would be interested in serving the development with one of their car club vehicles. Furthermore, an outline Residential Travel Plan is submitted with the planning application. This will be a 'live' document and shall highlight to residents the existing sustainable travel options that are available within close proximity of the site and provide incentives to discourage the use the of the private car for travel where possible.
- 6.93 The scheme also includes a policy compliant level of cycle parking, 313 spaces, at a ratio of 1 space per dwelling. In addition, a further 20 visitor spaces are also provided in the central 'green spine'. Provision of cycle parking spaces will further encourage transport by sustainable travel modes and disincentivise car usage.

- 6.94 The associated vehicle trip generation of the proposed scheme has also been assessed in comparison to the trip generation associated with the existing land use. At present, there are 268 two-way trips in the AM peak hour and 170 in the PM peak hour associated with the existing car park. This comparison shows that there will be an overall reduction in traffic in both peak hours, following the site's development for residential use. The impact of the proposal upon the local highway network is shown to be acceptable within the submitted Transport Assessment.
- 6.95 Alongside the submitted Transport Assessment and Residential Travel Plan, a Car Parking Management Plan, a Waste Management Plan and a Construction Traffic Management Plan have been submitted. A separate Construction Environmental Management Plan has also been submitted dealing with both the demolition and construction phases to demonstrate that the scheme's construction related impacts will be acceptable.

Flood Risk & Drainage

- 6.96 The NPPF states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk. At the local level, Policy R7 states that planning permission will not be granted for development which poses a threat to the quality of both surface and/or groundwater. Where proposals are acceptable the use of sustainable drainage systems will be encouraged, dependent on local site and underlying groundwater considerations.
- 6.97 The site is located in Flood Zone 1. The Environment Agency's surface water flood map shows the majority of the site is in an area that has a 'very low' risk of surface water flooding. However, there is a low, medium and high risk overland flow pathway which enters the site mid-way along the west boundary and proceeds southwards across the site and exits at the south boundary to continue onto Network Rail land. It is considered much of the surface water flood risk, which originates within the site, can be managed through the proposed surface water drainage strategy outlined in the submitted Flood Risk Assessment & Drainage Strategy.
- 6.98 Surface water runoff from the site will be managed through a combination of SuDS including permeable paving, permavoid and geo-cellular crates. The required attenuation will be provided by three geo-cellular crates systems and permavoid, restricted to a combined flow rate of 8l/s, before discharging to Thames Water public sewer, subject to a S106 sewer connection agreement which can be addressed at the detailed design stage.
- 6.99 The anticipated peak foul water flow for the proposed development is approximately 14.5l/s (based on Design and Construction Guidance for foul and surface water – May 2021). It is proposed the foul water flows from the site are drained under gravity and connected to the public foul water sewer within the site at multiple locations, subject to a s106 sewer connection agreement which can be addressed at the detailed design stage.

6.100 A pre-development enquiry response from Thame Water have confirmed there is sufficient capacity in the adjacent public sewers to accommodate the proposed surface and flows water flows from the site. In conclusion, this Flood Risk Assessment demonstrates that the proposals are consistent with the aims of the NPPF. The site will not be at significant risk of flooding or increase the flood risk to others.

Fire Safety

6.101 An Outline Fire Safety Strategy has been submitted with the application in order to explain the fire safety principles that have been embedded in the proposed scheme design, and demonstrates that the proposal will comply with fire safety Building Regulations.

Archaeology & Geotechnical

6.102 An Archaeological Desk-based Assessment is submitted with the application. The assessment finds that The site has a low potential to contain archaeological remains of all periods. Any remains that might survive are likely to be of local (low significance). The development proposals can be considered unlikely to have a substantial negative impact or cause significant harm to the archaeological resource of the site. Therefore in the event that the Council requests further archaeological mitigation, it is recommended that any such mitigation could follow the granting of planning consent secured by an appropriately worded archaeological planning condition.

6.103 A Phase 1 and Phase 2 Geotechnical assessment has also been undertaken to determine ground conditions, establish if there are any geo-environmental risks associated with the site and its proposed development and to provide a geotechnical appraisal. To assess the nature/ quality of soils beneath the site, 15 boreholes were formed to a maximum depth of 25.0m below existing surface level.

6.104 No clear evidence of contamination was noted during the field works and laboratory analysis found shallow soils across the site to be chemically suitable for their proposed end use. However, given the nature of the infill, it is recommended that a minimum of 100mm of certified clean topsoil material is placed across all proposed soft landscaped areas to provide an adequate growing medium. No further works or risk assessment has been recommended with regards to contamination, providing that some standard health and safety precautions are followed during the redevelopment process.

7. Affordable Housing Statement

- 7.1 At the national level, the NPPF recognises the difficulties faced by those wanting to own homes, and outlines an expectation that major housing developments will provide homes to be available for affordable home ownership. It requires local planning authorities to ensure that their policy documents reflect the housing needs of different groups in the community, including those who need affordable housing.
- 7.2 At the local level, the current District Plan Policy H7 states that the Council will seek to negotiate a minimum of 30% affordable housing on sites of 1ha or more or proposals providing 25 residential dwellings or more. Policy H7 goes on to state that the proportion, type and mix of affordable housing will be based on information in the latest housing needs survey. Within the emerging Local Plan Policy SP7 takes the same approach, requiring 30% on-site affordable housing within Welwyn Garden City, subject to viability, on sites of 0.5ha or more or proposals providing 10 new dwellings or more.
- 7.3 Again, Policy SP7 does not specify a required or preferred affordable tenure split, with supporting text stating that proposals should take account of the Council's latest evidence of need and include a mix of dwelling sizes; not just one size of affordable dwelling. Therefore, there is no prescriptive policy requirement for a particular affordable housing tenure mix within the Development Plan.
- 7.4 Despite the above policy approach within policy, which leaves consideration of tenure to the evidence base, the Council's latest evidence base document in the form of the Strategic Housing Market Assessment (2017), and before that the SHMA Partial Update in 2015 do not provide clear recommendations either. Both illustrate that there is a need for all affordable tenures.
- 7.5 Despite the above, at an early pre-application advice meeting, officers advised that they considered a policy compliant affordable housing tenure mix to comprise 49% intermediate products, and 51% social rented tenure. Following a subsequent meeting with the housing officer, an alternative mix containing 70% social rent was requested.
- 7.6 Bellway's affordable housing proposal, which has been maintained from the bid stage when Bellway were selected by the Council as its preferred development partner, contains a policy compliant 30% affordable housing, containing 70% affordable rent / 30% shared ownership.

Table 7.1: Proposed Affordable Housing Mix & Tenure Mix

Dwelling Size	Affordable Rent Units	Shared Ownership Units
1 bed	28	10
2 bed	34	18
3 bed	4	0
Sub-Total	66 (70%)	28 (30%)
Total	94	

Planning Statement

Campus East Car Park, College Way, Welwyn Garden City, Herts, AL8 6DG



- 7.7 In anticipation of the above, the Planning Performance Agreement agreed between the Council and Bellway included the requirement for a Financial Viability Assessment to be provided, should the affordable housing tenure mix not be agreed at application stage. On this basis, a Financial Viability Assessment (FVA) has been submitted with the planning application which examines the scheme's development viability based upon a range of scenarios with different tenure mixes.
- 7.8 The FVA shows that based upon 30% affordable housing provision comprising 70% affordable rent / 30% shared ownership, the application proposals (Scenario 2) will make a small profit, but there is a substantial profit shortfall. Even if all the 30% affordable housing proposed were of intermediate tenure (Scenario 3), the scheme would again make a small profit with a large profit shortfall. The FVA demonstrates that other scenarios, such as the 70% social rent / 30% intermediate tenure split requested by the housing officer, would not make any profit at all and the scheme would make a loss – it would be unviable.

8. Planning Obligations

- 8.1. It is expected that during the determination of the planning application Bellway will discuss with the Council and Hertfordshire County Council, any planning obligations which are required in order to make the development acceptable. At the current point in time, the following Heads of Terms are anticipated:

Heads of Terms

- Provision of 30% affordable housing (70% affordable rent / 30% shared ownership)
- 8.2. Any further planning obligations which may be considered to make the development acceptable will be discussed further during the determination of the planning application, either with Welwyn Hatfield Borough Council or with Hertfordshire County Council.

9. Summary of Scheme Benefits

- 9.1. This Planning Statement has been prepared in support of a detailed planning application submitted to Welwyn Hatfield Borough Council on behalf of Bellway Homes Ltd (North London) to provide 313 residential dwellings, including 30% affordable housing, at Campus East Car Park, Welwyn Garden City.
- 9.2. The proposals will provide a wide range of significant planning and regeneration benefits for the site and the surrounding area. The following is a summary of the benefits which are also encouraged by planning policy at all levels. These benefits include:
- The re-use and regeneration of previously developed brownfield land, located in a highly sustainable location, which will remove an inefficient, undesirable and unsustainable existing land use followed by the creation of a high-quality, attractive and bespoke residential development, of an appropriate scale and density, that has been designed in recognition of and in accordance with the Garden City principles;
 - The provision of a significant number of market dwellings (219) including 30% affordable housing (94) including a range of dwelling sizes and affordable tenures, to create a mixed and balanced community within the town centre and address the current shortage of housing within the Council area.
 - The creation of modern, well-designed, energy efficient homes that utilise a fabric first approach, incorporating renewable energy technologies (PV panels, air source heat pump), designed to entirely avoid fossil fuel consumption.
 - A reduction in the existing surface water run-off flow rate, restricting this to greenfield levels, through the introduction of SuDS including permeable paving, and below ground storage tanks. An increase in Biodiversity Net Gain through the provision of high quality landscaped areas
 - The provision of a substantial, publicly accessible, landscaped amenity space at the heart of the scheme, which reflects the existing desire line between the town centre to the south, and the residential neighbourhood to the north. The route will provide a pleasant, safe and attractive publicly accessible pedestrian and cycle route, in place of the existing unattractive, unplanned and difficult to navigate route
 - The provision of financial and non-financial planning obligation contributions (to be discussed and agreed with the Borough Council and the County Council)
 - The creation of new construction roles, both directly on site and indirectly within the supply chain, over a substantial construction period of several years, at a time of economic uncertainty as the country enters a national recession.
- 9.3. Aside from the above site specific benefits, the scheme would also provide the following additional benefits to the wider Council area:
- The site's development would signal a clear vote of confidence in the Council area, delivering upon the Council's 2120 Framework strategy and finally regenerating a site which has been allocated for development since before the current Local Plan was adopted in 2005.

10. Summary and Conclusions

- 10.1. This Statement has assessed the material considerations arising from the proposals against the prevailing planning policy framework (the Development Plan) and has demonstrated that the scheme complies with the relevant national and local planning policy and guidance.
- 10.2. Principally, the scheme involves the provision of a substantial number of new dwellings, including both market dwellings, and a policy compliant percentage of affordable dwellings. The Council's adopted Local Plan dates back to 2005, and the issues the Council is facing in adopting a replacement Local Plan are well known. In the absence of an up-to-date Local Plan, there is no plan to ensure that sufficient housing is being delivered.
- 10.3. It is recognised that the Council area is significantly constrained by the presence of Green Belt, however this only serves to highlight the importance that suitable, previously developed sites such as the Campus East Car Park, are developed. Such sites must be developed at an appropriate scale and density in order to ensure the contribution they have the potential to make to the Council's immediate housing supply, is not wasted.
- 10.4. Fundamentally, the Council have no 5 Year Housing Land Supply, and are failing the Housing Delivery Test, therefore the 'tilted balance' or presumption in favour of sustainable development is engaged. The Framework establishes that in these circumstances, the Council should grant planning permission, unless 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.
- 10.5. In this case, it has been demonstrated that there are no harms arising that would result in this conclusion being reached. On the contrary, the benefits of the scheme are numerous and significant, and should be afforded substantial weight by the Council, as the decision maker.
- 10.6. For the above reasons, Council officers should recommend the application for approval at the earliest opportunity.