

## 1. Introduction

This is a council-owned piece of land, that has been leased to Bellway Homes. It is a site in the heart of the town and sited in a high-profile, visible area, within the conservation area. The application does not live up to this and fails to meet the criteria set by policy and the needs of the town; it does so in a number of areas.

1. Social Housing. Policy states that social housing allocation on this site should be 47 units, yet this application has 0% social allocation. On a site that the council owns and has leased to the developer, to have not helped one single person from the 3,000 on the waiting list is both disgraceful and against policy.

2. Affordable Housing. The current allocation of affordable housing is predominantly in one block. We have seen tangible evidence in local developments of this not working effectively. The affordable housing should be positioned around the development so as not to create a divide or stigma.

3. Dwelling Type. Council policy states that 62% of dwellings on new developments should be 3 and 4 bedrooms. This application fails as only 4.6% are 3 bed and 0% are 4 bed. This is a shortfall of 182 properties.

4. Density. The site is slightly over 2 hectares, meaning that there is a density of 150 dwellings per hectare. This is vastly greater than any other site in the town centre and twice the desired density in the Broadwater Road Supplementary Planning Document

5. Local Plan. The local plan has an allocation for a maximum of 290 homes, this application increases this by 8% without adequate or any justification.

6. Height. The block(s) of 6 storeys is at odds with the council's policy town-wide policy of a maximum of 5 storeys. The 6-storey block is within the conservation area and this height limit must be adhered to.

7. Overlooking. The blocks at the north end of the site rise to 4/5 storeys at the point where they meet neighbouring properties. This gives rise to privacy and encroachment issues to those neighbours. Where the site borders lower properties the height should be limited to avoid these issues, On other masterplans (eg Birchall Garden suburb), heights are stepped up from existing houses, so 3 storeys would be more reasonable at the north end. This should also be addressed and also potentially sent to the design review panel prior to being heard at DMC.

8. Parking Rate. The allocation of parking on the application is 0.58 per dwelling overall. Whilst this is a town centre site and can be deemed to be more sustainable than elsewhere, real and current evidence from the 2021 census shows that car ownership in the immediate area (Handside and Sherrards), is significantly higher. In fact, it shows clearly that at least 77% of homes have at least one vehicle, and average vehicle ownership is at least 1.2. (Source: 2021 Census).

9. Parking Split. While the owned homes will all have a parking space, the 'affordable' homes will only have 0.37 per home. This is clearly insufficient and there is no justification, rationale or supporting evidence for the assumption that those living in affordable homes have less requirement for a vehicle.

10. EV Charging. The allocation of spaces equipped with EV is at 50%, this is in contravention of building regulations Part S introduced in 2021. Whilst officers may state that this is a building regulation rather than planning regulation, it would be wholly negligent and remiss of any officer to recommend an application for approval, whilst being aware that it contravenes building regulations.

11. Play Space. Absence of space where older children could play ball games. While the area of open space is perhaps acceptable, it is punctuated by a large number of trees which

would make ball games impossible. Local Areas of Play needed. Or does the applicant expect children to use The Campus, necessitating crossing a busy road and playing up to a busy road?

12. Design. There is a lack of continuity in the design between the block in the conservation and the blocks not within. The design does not utilise the accepted window style in the town centre design guide. The design does not widely utilise mansard roofs, which is the style of town centre dwellings.

13. Sustainability. Where is the cycle path that would be ideal to encourage sustainable vehicle use? There is a huge, missed opportunity to include cycle facilities to reduce the existing gap between the new cycle path on Hunters Bridge, to the Ayot Greenway. Simply reducing car park spaces, does not achieve sustainable transport use, as has been evidenced in other local developments. I suggest that at the very least a sizeable S106 contribution is made based on the recommendations from the Local Cycling and Walking Infrastructure Plans team at HCC.

14. Education. Specifically, where will the children of the new residents go to school? An S106 contribution towards schools does not magically create space for schools to expand both physically and in terms of class numbers. The county must ensure that adequate schools provision is in place in local schools that can be reached by sustainable transport, cycling and walking, prior to the development being approved.

15. Consultation. As a general note, it should be recorded that the consultation on this development appears to have been nothing more than a PR exercise. Having initially consulted and made changes to the plans, the application that has been submitted does not reflect the changes that were expected. Whilst it is not the council holding the consultation, WHBC should have guidelines so that as a minimum requirement consultations are a) Meaningful b) Given Adequate Notice c) Held at convenient times for the public d) Provide Adequate information to enable an informed opinion to be reached.

16. Application Documents. The documents submitted by the applicant do not give residents or councillors adequate information on which to produce an informed opinion. There is a lack of rendered views from various aspects around the development e.g the Campus. Scant details of screening around the car park areas, and I don't believe that anywhere other than on a technical drawing, does it refer to block A being 6 storeys tall. Once again, this is not conducive to an open and transparent consultation with affected stakeholders.