

## **Campus Park East (Bellway Homes)**

**Application Reference: /6/2022/2801/MAJ**

I would like to formally object to this application as I feel that it has numerous shortcomings that need to be addressed. The applicant seems to have ignored much of the feedback from the consultation meetings and it is unclear whether the applicant has been guided by the Council or vice versa - either way this applicant cannot be supported as it currently stands. I understand that the carpark is designated in The Local Plan for redevelopment and that there is a shortage of housing in the Borough, but the shortage of property for sale is for houses rather than flats, whereas in the social renting sector there is according to comments from Councillor Boulton at the last full council meeting on the local plan that there are 1500 people looking for 1 bedroom properties with 3000 on the waiting list. It is therefore disingenuous for land that was owned by the Council, and leased to Bellway for 250 years for £18m, not to include any properties for social rent. For this reason alone this application should be refused by DMC

In addition to the above the other reasons for objections include :

### **Density and Height**

1. The Planning statement states that the site is slightly over 2 hectares, resulting in a density of 150 dwellings per hectare. This is much greater than any other site in the town centre and as a comparison twice the desired density in the Broadwater Road Supplementary Planning Document
2. The local plan has an allocation for a maximum of 290 homes, this application increases this by 8% without adequate or any justification which results in over development.
3. Whilst it is unclear and disingenuous of the applicants not to be totally clear on the height of the blocks, it would appear that there is at least one that would be at 6 levels, on the basis that the ground floor is shown as level 0. This would appear at total variance to the council's policy town-wide policy of a maximum of 5 storeys.
4. 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 and lack of sunlight. Where the site borders 2 storey traditional houses the height should be limited to negate these issues, this had been raised by residents at the consultation meetings but again clearly ignored by the developers. Existing residents should not have their outlook impaired and properties devalued by developments that merely provide profits for the developers so that they can meet their 18% operating margin.
5. The applicant has not provided enough visuals to fully understand the development from different aspects, it may well be that these have been shared with the Council

but from a residents perspective it is unclear and therefore one is left with the feeling “ what are they trying to hide”, especially in relation to height.

### **Design**

1. There seems to be big disparity between the design of this residential building and adjacent buildings of John Lewis , The Council offices , Waitrose , Peel Court , Rossanne House and the former Debenhams building and the rest of the town centre. The design does not utilise the accepted window style in the town centre design guide and in reality are just very bland to look with few outstanding architectural features. As there has been a number of pre applications discussions where it appears that the Council have been involved in the design features , then “ shame on the Council for not protecting the conservation area “. It is also unclear from the pictures whether some of the facades are rendered , and if this is the case then this wall treatment is not one used in the town centre or conservation area.

### **Types of housing , location and tenure**

1. The Council has a requirement 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. If one looks at the wider area around the town centre development including Broadwater Road and Bridge Road where planning permission has been granted over 95% of all properties are 1 and 2 bed apartments , when the demand in the town from private buyers is houses . A straw poll of estate agents in the town centre suggests that there is limited demand for flats and therefore should any of these developments be built, this will affect any financial feasibility study .Flats that have been sold in the last 4-5 years are being resold at the same price that they were originally bought for , and the growth in the market for increases in prices for those already available are limited . At one of the most recent developments in Bridge Road the last remaining flats without parking were reduced by 10% to 20% which clearly would have negatively affected any financial return.
2. The **current allocation of “affordable housing”** is predominantly in one block and this block faces the railway, the railway sidings but will also be affected by noise from the Waitrose service yard. As affordable housing is 80% of the market and aimed at the private buyer then it does not seem fair that these properties should be the ones that will be most affected by noise. The “affordable housing” should be positioned around the development.
3. The **lack of any social housing** on a Council owned site is a sad indictment against the Council and for the 3000 people waiting for accommodation . There is mention of a feasibility study ( but no detail provided ) and that whilst the development produces profit on a number of scenarios it fails to meet Bellways’ profitability criteria - so in reality Bellway overpaid for a site because there was no requirement to provide social housing and the losers of this will be the local residents of Welwyn Hatfield. Looking at the latest set of audited accounts for Bellway it shows that they

are looking to achieve an operating margin of 18% in 2023 but also that they have to make provisions of over £500m for rectifications on previously built apartment buildings going back 30 years - residents of Welwyn Hatfield on the housing list should not be paying the price for this through the justification that Bellway cannot afford to provide social housing on this site

## Parking

1. The **allocation of parking** on the application is 0.58 per dwelling. This is a town centre site and can be deemed to be more sustainable than elsewhere but this is based on a 2011 Census figure . The evidence from the 2021 census shows that car ownership in the immediate area (Handside and Sherrardswood ), is significantly higher:
  - a. at least 77% of homes have at least one vehicle, and average vehicle ownership is at least 1.2. (Source: 2021 Census).
  - b. We are know from nearby developments such as Times Square that the parking provision is on a 1 to 1 basis and there is still a significant overspill into neighbouring roads and many of the businesses have been forced into providing cctv and barriers to prevent parking on their own land
  - c. If the parking ratio cannot be improved , either by a reduction in the number of flats or an increase in parking spaces , then sales contracts must state that that car ownership in those flats is prohibited or an arrangement is made with the Council for permits in Council carparks
  - d. There is already a significant overspill into Handside Ward of parking from flats in the town centre, where many roads have non residents and commercial vehicles parking from 5.00pm and are then moved in the morning , except over the weekend where they can be parked from Saturday evening until Monday morning . This affects the viability of the town centre which is already under threat .
2. While flats in private ownership will have a **parking ratio** of 0.69 , the flats allocated as being affordable ( rent and shared ownership ) will only have 0.37 per home. This is totally insufficient ; there is no justification, rationale or supporting evidence for the assumption that those living in affordable homes have less requirement for a vehicle. In fact from evidence at Times Square there is a greater requirement for those living in shared ownership flats to have a requirement to have at least one parking space as many will need the income of two people to justify mortgage , rent and service charges . The response from the Police also questions why there is such a disparity between private and affordable ownership
  - a. Car parking, or the lack thereof is also of concern. Stating that the TA inform that car ownership is more likely in privately owned flats is worrying to me. It borders on dangerous thinking to assume only people with the means to buy a flat will have a car and therefore require a parking space

3. 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.

#### Noise

1. It is accepted that noise will be an issue on the development from the railway , the railway sidings and Waitrose and that mitigation measures have been put in place such as mechanical ventilation as an example . It is somewhat surprising that the developers are critical of the Council for not specifying the hours that the Waitrose service yard can operate, which adversely affects noise on the nearest apartments . If planning is granted then there needs to be very tight and strict requirements about noise including pre occupation testing so that the same issues that have arisen elsewhere in the town do not impact this development or the operations of Waitrose and the rail network

#### Play space

1. It has to be accepted that there will be a number of children on the development but there appears a total lack of any meaningful play areas and nothing that meets the requirements of LEAP or LAP . In the absence of space on site then parents will be required to drive their children to either Stanborough Park or King George as examples as neither are within easy walking distance. However , this does little to help the site to be deemed “sustainable “ – if this cannot be provided on site then S106 funding should be provided to have this on Campus West as the nearest available site

#### Education.

Where will the children of the new residents go to school? Hertfordshire County Council 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 as anecdotal evidence suggests that the most local one Templeford is already full and others are not within reasonable walking distance . meaning that the sustainability of the site has to be further questioned

#### Sustainability.

Hertfordshire County Council are investing significant funding in developing cycle ways in the town centre but there does not appear to be any link from the development into this network either from Hunters Bridge or from the Campus . In view of the shortfall in parking this should be regarded as an absolute requirement. Additionally bearing in mind that the Ayot Greenway has recently been resurfaced the developers and HCC

should look at ways to provide a link to that cycle network , funded by the developers. I fully support the comments from Welhat Cycling in this respect .