

Objections and comments on the Campus East (Bellway scheme) application from 'Keep the G in WGC'

Fundamental

We strongly object to the total lack of any social (council) housing in the application. The applicant tells us this is due to the council not insisting on any when the land was sold/transferred to the applicant.

This means the opportunity to significantly drive down the number of local residents on the council's waiting list has been lost. To not ensure development of social housing on a hitherto council-owned site is frankly incredible. If possible, the deal should be undone and a far more equitable set of requirements built in. The requirement for 'best value' has in our opinion not been accomplished.

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.

Welwyn Hatfield Borough Council District Plan 2005:

Policy H7 - Affordable Housing Within the towns and specified settlements, the Council will expect all proposals for residential development on sites of 1ha or more, or with 25 units or more, to include the provision of affordable housing to meet the needs of local people who cannot afford to occupy dwellings generally available on the open market. The Council will therefore seek through negotiation a proportion of affordable housing, which as a minimum should comprise 30% subsidised housing, on each suitable site. The proportion, type and mix of affordable housing will be based on information in the latest housing needs survey and the criteria in Section 10 of Circular 6/98. Sites that make provision for key worker housing in addition to the affordable housing requirement will be supported.

Planning policy issues

Despite the site being cheek by jowl with the town centre and partly in the West Side Conservation Area, constraints that were written in for developments in the industrial area of Broadwater Road, which shares none of these characteristics, have been ignored. These include:

Height

Despite promises made to us by Bellway, heights of up to 6 storeys are proposed, when the only building of this height nearby puts its 6th floor within a mansard roof, something the application makes a 'virtue' of not doing, making the height even more pronounced. This makes the proposals discordant and fails to respect the surrounding area. The use of mansard roofs to disguise the height has become a dominant feature within the town centre, particularly when an additional floor has been added.

Density

The proposed density is approximately 150 units per hectare; this is twice the council's maximum recommended for Broadwater Road developments where an industrial and denser environment might be expected and is vastly greater than any other site in the town centre and twice the desired density in the Broadwater Road Supplementary Planning Document

Welwyn Hatfield Borough Council District Plan 2005:

Policy D1: Quality of Design The Council will require the standard of design in all new development to be of a high quality. The design of new development should incorporate the design principles and policies in the Plan and the guidance contained in the Supplementary Design Guidance.

D1. 7.19. In considering the character and context of an area, account should be taken of its history, the geography and geology of the area, the landform of a site, the existing vegetation and landscaping, including trees, the existing street layout and pattern and form of building, and use of space, the local materials, the scale, height and massing of the built form and boundary treatments, and of any distinctive architectural and landscape quality and features such as trees, fenestration and brickwork. Further guidance can be found in the Supplementary Design Guidance.

Policy D2: Character and Context The Council will require all new development to respect and relate to the character and context of the area in which it is proposed. Development proposals should as a minimum maintain, and where possible, should enhance or improve the character of the existing area.

Policy D11: Design Statements Applicants will be required to submit a design statement with all applications for business, commercial or residential developments. The statement should justify how the development meets the design principles, policies and guidance set out in the Plan and the Supplementary Design Guidance.

Number of units

The not-quite-yet-adopted Local Plan assigns 290 units for the site, yet even before the ink is dry, this is set to be exceeded by nearly 10% without adequate or any justification.

Size and type of units

Only 14 units of more than 2 bedrooms are proposed, again contrary to the recommendations in the Local Plan. All the units are flats, another deviation from recommendations. 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 compliant properties.

Where are any houses?

Strategic Housing Market Assessment Update 2017 Welwyn Hatfield Objectively Assessed Needs

	1 bed	2 beds	3 beds	4 beds	Total
Detached house	1%	9%	27%	63%	100%
Semi Detached house	4%	18%	57%	21%	100%
Terraced house	3%	21%	62%	14%	100%
Flat	50%	43%	5%	2%	100%

(Breakdown of flats taken from Design & Access Statement)

	1 bed	2 beds	3 beds	4 beds	Total
Proposed flats	116	183	14	0	313
%	37.06	58.47	4.47	0	100

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.

Why does the council allow applications to get through extensive pre-application discussions when it still results in so many of its policies are being breached? This gives no confidence to residents.

Play space

Although the gross amount of play space appears relatively generous compared to say, Biopark, the amount of tree planting proposed means that there does not appear to be anywhere suitable for ball games e.g. by older children. Or are they supposed to make the difficult crossing of The Campus and hope the ball does not go onto the busy road when they play?

Welwyn Hatfield Borough Council District Plan 2005:

Policy OS3 - Play Space and Informal Open Space Provision in New Residential Development Substantial new residential development (of 0.4 hectares or above) will be expected to make a contribution to the provision of children's play space and informal open space, where the increased demands generated by the new households cannot be met by current levels of provision. The scale of any contribution will be in line with the number of new households in the development, and the type of facility to be provided will be based on meeting NPFA standards. Where new space is created it must be easily accessible by pedestrians and cyclists, and be designed to be a safe and secure environment for all people using the facility. Contributions will take the form of the direct provision of facilities on site or, where appropriate, the payment of a commuted sum by the developer to facilitate the provision of a facility elsewhere.

Parking

While the privately owned homes will all have a parking space, the 'affordable' homes will only have approximately 0.37 per home. This is evidence of a clear and discriminatory 'poor doors' policy that should have no place in a town with the social history of WGC.

The allocation of parking on the application is 0.58 per dwelling overall. Whilst this is a town centre site and while it 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).

There is no justification, rationale or supporting evidence for the assumption that those living in affordable homes have less requirement for a vehicle.

It is also noticeable the Herts Constabulary have recently objected to the assumption that lower parking provision on a development will lead to lower car ownership.

Welwyn Hatfield Borough Council District Plan 2005:

Policy M14 - Parking Standards For New Development The Council will require parking provision for new development to be made in accordance with the standards set out in the Council's supplementary planning guidance on parking. These standards represent the maximum allowable

provision, except for cycle parking and car parking for disabled people where the standards represent the minimum allowable.

Supplementary Planning Guidance Parking Standards 2004

Bedsits	0.75
1 bed	0.75
2 beds	1
3 beds	1.5
4+ beds	2

(Breakdown of flats taken from Design & Access Statement)

		Std	Req.
1 Bed	116	0.75	87
2 Beds	183	1	183
3 Beds	14	1.5	21
			291

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.

Cycling

No attempt is being made to provide a cycle route extension from the eastern end of the Ayot Greenway to for example Bridge Road, to link with the new cycle lanes across Hunters Bridge. This should be addressed.

Welwyn Hatfield Borough Council District Plan 2005:

Policy M6 - Cycle Routes And Facilities The Council will require proposals for new development to encourage cycling through the inclusion of safe cycle routes and parking for cycles, and where appropriate secure waterproof storage and changing and showering facilities for cyclists. New cycle routes should link with existing or proposed cycle paths. Developers may be required to provide or contribute towards off-site facilities and the overall planned cycle network. The Council has reviewed the Welwyn Hatfield Cycling Strategy, to ensure that it continues to provide an adequate framework to guide investment in the infrastructure necessary to create a comprehensive network of routes and facilities in the district.

Design matters

There are specific references in the Design and Access Statement to the fact that around half the site is in the Conservation Area, and half is outside it, and that the application is making use of this loophole to set up different standards. Examples include a higher standard of design within the CA, and that all the surface car parking is at the outer edge of the non-CA part. This artificial distinction

should not be being used and the council should insist on the higher standard applying across the site.

It should be made clear how the ribbon lengths of surface car parking are to be screened from views from The Campus or preferably that they are relocated to the eastern part of the site.

The explicit refusal to use neo-Georgian style windows with glazing bars, when next-door Peel House uses them, as well as for example John Lewis and the council offices, smacks of snubbing their nose at the predominant design style of the town.

There is a lack of continuity in the design between the proposed block in the conservation area and the proposed blocks not within it. 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 town centre dwellings.

The mix of 3 styles of balconies introduces disharmony when the only gain appears to be a minor cost saving for the developer. Juliet balconies serve no useful function and look mean – they should be replaced by cantilever ones. It is in any case hard to see exactly what types are being proposed from the small-scale drawings.

Minimal use is being made of stone as a design feature, despite its extensively being shown off in the DAS. It could be used to help define the entrances to the blocks, acknowledged as an issue, instead of playing with brick patterns which will be hard to see at night.

The consultation process. 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 agreed and 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.

Summary

The total lack of social housing is a grievous error and we await any kind of explanation as to how this has arisen. Citizens of the town will not readily forgive this omission. It should be corrected.

Yet again, council policies on requirements such as height, density, type and number of units have been ignored. Despite extensive discussions with ourselves and with council officers, the applicant has made few attempts to blend in with the surroundings, in terms of design, in some cases reversing previous promises. This does not bode well.

The overall design is so generic and non-specific to WGC that at least one of the pictures in the recent public information leaflet actually features part of a separate development that is nothing to do with WGC.

The council should be standing up for its citizens and its policies. The application should be rejected.