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# Planning Statement

Planning Application for Redevelopment of Former  
Shredded Wheat Site, Welwyn Garden City

Iceni Projects Limited on behalf of  
Plutus Estates (WGC) Ltd

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ON BEHALF OF PLUTUS  
ESTATES (WGC) LTD

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**Planning Statement**  
PLANNING APPLICATION FOR REDEVELOPMENT OF  
FORMER SHREDDED WHEAT SITE, WELWYN  
GARDEN CITY



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## 1. INTRODUCTION

1.1 This Planning Statement has been prepared in support of a planning application by Plutus Estates (WGC) Ltd for a mixed-use redevelopment to create a new civic, residential and business quarter at land known as the former Shredded Wheat Factory, off Bridge Road and Broadwater Road in Welwyn Garden City.

1.2 The description of development is as follows:

*Creation of a mixed-use quarter comprising the erection of up to 1,340 residential dwellings including 414 (31%) affordable dwellings (Use Class C3); 114 extra care homes (Use Class C2); the erection of a civic building comprising 494 sq.m of health (Use Class D1), 494 sq.m of*

*community use (Use Class D1), 1,232 sq.m of office (Use Class B1) and 646 sq.m of retail (Class A1/A2/A3/A4/A5); alterations, additions and change of use of Grade II Listed Building and retained Silos to provide 5,096 sq.m of flexible business floorspace (Use Class B1), 265 sq.m Combined Heat and Power (Sui Generis), 2,494 sq.m International Art Centre (Use Class D1), 1,226 sq.m Gymnasium (Use Class D2), 1,576 sq.m of restaurant/coffee shop/bar (Use Class A1/A3/A4/A5), Creche/Day Nursery of 644 sq.m as well as a Network Rail TOC Building of 364 sq.m; plus associated car parking, access, landscaping, public art and other supporting infrastructure.*

1.3 This Planning Statement sets out the relevant planning background to the proposal, presents the application scheme and demonstrates how the planning issues associated with the development have been addressed and how they comply with the planning policy at local and national level.

1.4 This proposal has been the subject of numerous pre-application meetings with both Hertfordshire County Council and Welwyn Hatfield Borough Council and has been the subject of an iterative design process. This Statement details how the scheme has evolved and developed as a result of the comments and inputs from the LPA and local community.

1.5 This Planning Statement should be read in conjunction with the Architectural Plans and associated Design & Access Statement prepared by ColladoCollins, together with all other consultant documents which comprise the planning application, as follows:

- Architectural Plans prepared by ColladoCollins
- Civic Building Architectural Plans prepared by Louis de Soissons Ltd
- Environmental Statement and supporting appendices prepared by Entran
- Design and Access Statement prepared by ColladoCollins
- Transport Impact Assessment prepared by Entran
- Delivering the Wheat Quarter Document by Plutus Estates (WGC) Ltd
- Landscape Design Statement prepared by Bradley Murphy Design
- Affordable Housing Statement prepared by Icen Projects
- Engagement and Statement of Community Involvement prepared by Marengo Communications
- Structural Surveys and Report prepared by Meinhardt
- Sustainability Assessment prepared by Sol Environmental

- Energy Assessment prepared by Sol Environmental □ BREEAM Pre-Assessment prepared by Sol Environmental

1.6 The Planning Statement is structured as follows:

- Section 2 of this Statement sets out the relevant background to the application site;
- Section 3 explains the application proposal;
- Section 4 compares the consented scheme and the proposed scheme;
- Section 5 details relevant planning policies at national and local level against which the application should be determined against;
- Section 6 outlines the economic, social and environmental benefits of the proposal;
- Section 7 assesses the relevant matters in the consideration of the planning application;
- Section 8 details the various forms of consultation which have taken place during the development of the scheme; and
- Section 9 provides conclusions and summarises the planning benefits of the application.

## 2. RELEVANT BACKGROUND

### Site Context and Description

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2.1 The subject site, which is located to the east of Welwyn Garden City town centre in the Peartree ward, comprises a former cereal production factory to the north of Hyde Way and (largely cleared) industrial and factory uses on the southern side.

2.2 The development site, as shown in **Figure 2.1**, has an area of approximately 8.7Ha and was previously accommodated the Shredded Wheat factory in the heart of Welwyn Garden City, but has been lying dormant since before 2008.

**Figure 2.1 – Aerial View of Site**



2.3 The site forms part of the wider Broadwater Road West development site, an area allocated for mixed use development in the Welwyn Hatfield District Plan 2005 and is the subject of the Broadwater Road West Supplementary Planning Document (SPD) 2008. The application site is bounded on the eastern side by Broadwater Road (A1000), to the south by the Taylor Wimpey housing development and the Bio Park building, the Pall Mall distribution building and the East Coast Mainline to the west and Bridge Road/Hunters Bridge to the north. The application site is bisected by Hydeway, which runs east-west across the site and provides a pedestrian and vehicular link to the train station footbridge, and on to the town centre, for the eastern half of the town.

2.4 As shown in **Figures 2.2 – 2.5**, parts of the site are cleared of structures and buildings, although the former Shredded Wheat factory buildings, including the silos to the north of Hydeway and the former Polycell building immediately to the south of Hydeway are still lying vacant today. However, all of the buildings with the exception of the Grade II listed Production Hall and Listed silos, are subject of demolition which is currently taking place on the site.



**Figure 2.2 – Site looking south from Hyde Way**



**Figure 2.3 – Site looking east towards Broad Court**



**Figure 2.4 – Listed Factory facing railway**



**Figure 2.5 – Listed Silos from Hyde Way**



2.5 As shown in Figures 2.1 – 2.5, the site is centrally located in the heart of Welwyn Garden City, but has fallen into a state of disrepair. The dormant nature of the site is consequently having a detrimental impact on the environmental quality of the area and ultimately presents a barrier to the regeneration of the wider area. At present, having such a vacant, high profile site lying immediately east of the railway station creates a stigma to the area and fails to serve as the gateway to Welwyn Garden City. It is clear that the site requires considerable regeneration and investment.

2.6 The surrounding area is mixed in character. Broadwater Road is largely in industrial/office use on the eastern side and to the north of the site but more mixed to the south, with residential development (the Taylor Wimpey development) abutting the southern boundary and a large BioPark office and laboratory building to the south-west. Welwyn Garden City town centre is immediately west of the



adjoining East Coast Mainline and an existing pedestrian route extends across the site via Hyde Way and a footbridge over the tracks. This footbridge provides access to the railway station and Howard Centre mall. The Pall Mall warehouse and distribution centre is also located to the south-west of the site. Access to this site is currently provided via the Network Rail access from Bridge Road. A detailed site and context appraisal is provided within the accompanying Design and Access Statement prepared by ColladoCollins.

2.7 It should be noted that the existing office building on the eastern corner of Broadwater Road/Bridge Road is in the process of being converted to residential dwellings and this, coupled with the delivery of the Taylor Wimpey scheme, has helped to facilitate a change in the character of the area and a transition from business/commercial use to residential use. However, despite these recent developments, the key to regeneration within the area is still the Shredded Wheat site, and as such it is essential that the development proposals detailed in this planning application are delivered.

2.8 In regard to accessibility, the site has excellent connections to existing road, rail and the public transport network. The site is highly accessible via a variety of transport modes, and the A1(M), which connects to the M25, is within close proximity. Welwyn Garden City Railway Station abuts the site and is on the mainline between London Kings Cross and Peterborough and Cambridge. This line links Welwyn Garden City to Kings Cross in 23 minutes. Furthermore, the site is served by the Network Rail access road, off Hunters Bridge, by Hyde Way and a number of access points, currently not in use, from Broadwater Road. The Transport Statement prepared by Entran in support of this application provides further information in respect of transport and access.

2.9 In terms of local facilities, the site benefits from its close proximity to Welwyn Garden City Town Centre, which provides for most shopping and service needs including department stores, a shopping mall, independent retail shops, supermarkets, doctors, dentist, chemists, cinema and a variety of pubs, restaurants and cafes. Within 2 km of the site are several primary and secondary schools, the nearest school being Peartree Primary School on Peartree Lane. This is readily accessible to the development site via the public footpath that runs from Broadwater Road, just to the south of the site, to Peartree Lane. Formal public sports facilities are available within 1km at Gosling Sports Centre, water sports within 2km at Stanborough and indoor swimming within 4km at the Hatfield Swim Centre.

2.10 Based on the above, the site is clearly located in one of the most sustainable locations in the Borough in terms of public transport infrastructure and proximity to local facilities and key services,

and, as such, aligns with the core principle of the National Planning Policy Framework to deliver sustainable development.

2.11 According to the Environment Agency Flood Map, the entirety of the site is situated within 'Flood Zone 1', which is recognised as an area of least probability of flooding (i.e. land assessed as having a less than 1 in 1000 annual probability of river or sea flooding [0.1%].

## Planning History

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2.12 The site was historically the home to Shredded Wheat, however has not been in use since 2008. As such, planning applications prior to 2008 related to industrial uses.

2.13 The first significant applications pertaining to the use of the site since it became redundant were submitted in 2010 (LPA refs. N6/2010/2055/MA and N6/2010/0260/LB) when proposals were put forward for the redevelopment of the site to include the conversion of the 1920's production hall to offices, the conversion of the silos to a heritage centre and café and the redevelopment of the remainder of the site for a mix of uses in total comprising:

- 13,957 sqm of office floor space
- 344 residential units
- A supermarket of 4,646sqm
- 800sqm of additional retail floor space
- 1,000sqm of café/restaurants
- A 3,225sqm leisure centre
- A 950sqm doctor's surgery
- A 4,200sqm care home
- A YMCA facility of 5,800sqm
- A 3,200sqm hotel
- 909 cycle spaces
- 1,135 car parking spaces

2.14 This application was refused in January 2012 for a number of reasons that can be summarised as follows:

- The retail assessment failed to demonstrate an adequate sequential approach to retail development.

- The retail store would have a significant adverse impact on investment in and the vitality and viability of Welwyn Garden City town centre.
- Unacceptable in urban design terms.
- The proposal failed to make the most efficient use of land for housing and/or to deliver the Pall Mall site in accordance with the SPD.
- Adverse impact on highway safety, capacity and the free flow of traffic.
- The overprovision of car parking for the supermarket, and the failure to promote wider sustainable transport measures.
- The failure to meet the minimum car parking standards for the residential units.

2.15 The most recent applications were submitted on behalf of Spen Hill Developments Ltd in February 2015. The first of these was a hybrid application for part outline/part detailed permission (LPA ref.

N6/2015/0294/PP) for:

*'Part demolition, repair, restoration, extension and conversion of the former Shredded Wheat factory complex to include demolition of all buildings and structures except the original 1920's silos, production hall, grain store and boiler house. Refurbishment and change of use of the retained listed buildings to provide 2 Class C3 residential units, a Class C1 boutique/budget hotel, Class B1(a) offices, a Class A4 pub/bar, a Class D1 crèche and a Class D2 gym/dance/exercise studio. Erection of up to 850 Class C3 dwellings to potentially include up to 80 Class C2 (and/or C3 assisted living units), Class A1 retail, Class A3/A4 restaurants/café/bars/pubs, Class D1 community use and healthcare and Class D2 gym/dance/exercise studio floorspace. Provision of external space for leisure and recreation to include a linear park, external games/play area, allotments and a skate park. Creation of internal estate roads, paths, vehicle and cycle parking. Associated highway works comprising the widening of footways and the provision of cycle ways to Broadwater Road and Bridge Road, works to Hyde Way, junction remodelling works and the erection of a new footbridge from Bridge Road. Phase 1 (Blocks 2,3,4,5,6 & 7 on land to the north and west of Hyde Way and northern part of Block 1) – Includes Appearance, Means of Access, Landscaping, Layout and Scale in addition to all associated highway works. Phase 2 (Blocks 8,9,10,11 & 12 and southern part of Block 1 on land to the south of Hyde Way) – Includes Means of Access with Layout, Scale, Appearance and Landscaping reserved.'*

2.16 This application was formally approved by Welwyn Hatfield Borough Council, subject to a number of planning conditions and a Section 106 agreement on 18<sup>th</sup> August 2017.

2.17 This Planning Permission enabled demolition of the non-listed buildings and structures to take place without formally implementing the Permission. Since permission was granted, relevant predemolition conditions have been cleared with Welwyn Hatfield Borough Council, thus enabling demolition to commence across the site.

2.18 The second application was for Listed Building Consent (LPA ref. N6/2015/0293/LB) to enable the following changes to be made to the Listed Building structures:

*'Part demolition, repair, restoration, extension and conversion of the former Shredded Wheat factory complex to include demolition of all buildings and structures except the original 1920's silos, production hall, grain store and boiler house. Refurbishment and change of use of the retained listed buildings to provide 2 Class C3 residential units, a Class C1 boutique/budget hotel, Class B1(a) offices, a class Class A4 pub/bar, a class Class D1 crèche and a Class D2 gym/dance/exercise studio.'*

2.19 This application was formally approved by Welwyn Hatfield Borough Council, subject to a number of planning conditions, on 30<sup>th</sup> March 2017.

2.20 The relevant pre-demolition conditions imposed on this Listed Building Consent have all been cleared in order to allow demolition to take place in accordance with the previously-approved scheme.

2.21 In addition to the aforementioned applications, it is also worth noting that an application to make improvements to the footbridge (LPA ref. 6/2016/0457/FULL) located on Hyde Way was approved by Welwyn Hatfield Borough Council on 30<sup>th</sup> March 2017.

2.22 The demolition of the buildings detailed in the 2015 applications has now commenced in order to enable future development proposals for the site to come forward.

2.23 A full assessment of how the proposed development compares with the consented scheme is provided in Section 4 of this Planning Statement.

## 3. DEVELOPMENT PROPOSALS

### Introduction

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3.1 This section provides an overview of the proposed development and the key aims and objectives of the masterplan. The supporting Design and Access Statement should be read in addition to this statement as it provides a more detailed description of the scheme, the site's setting and how the scheme proposals have evolved through the design process.

3.2 This application seeks Planning Permission for the following:

*Creation of a mixed-use quarter comprising the erection of up to 1,340 residential dwellings including 414 (31%) affordable dwellings (Use Class C3); 114 extra care homes (Use Class C2); the erection of a civic building comprising 494 sq.m of health (Use Class D1), 494 sq.m of community use (Use Class D1), 1,232 sq.m of office (Use Class B1) and 646 sq.m of retail (Class A1/A2/A3/A4/A5); alterations, additions and change of use of Grade II Listed Building and retained Silos to provide 5,096 sq.m of flexible business floorspace (Use Class B1), 265 sq.m Combined Heat and Power (Sui Generis), 2,494 sq.m International Art Centre (Use Class D1), 1,226 sq.m Gymnasium (Use Class D2), 1,576 sq.m of restaurant/coffee shop/bar (Use Class A1/A3/A4/A5), Creche/Day Nursery of 644 sq.m as well as a Network Rail TOC Building of 364 sq.m; plus associated car parking, access, landscaping, public art and other supporting infrastructure.*

3.3 The proposed development responds to the wider regeneration of the area and the strategic and emerging local planning policy context. The proposals include the efficient reuse of brownfield land and will deliver a very significant number of much-needed new homes and jobs in the local area. In summary, the proposed development will deliver the following:

**Residential**

- A high-quality residential scheme providing 1,340 apartments, of which 414 (31%) will be affordable dwellings, and 114 extra care homes.
- A range of dwelling sizes, including 1-bed, 2-bed and 3-bed apartments.
- Provision of 0.7 car parking spaces per residential unit, totalling 1,135 spaces.
- Provision of 1681 cycle parking spaces.
- Provision of an energy centre.

**Commercial/Community Uses**

- 14,531m<sup>2</sup> of commercial/community space in a range of flexible uses, including A1/A2/A3/A4/B1/B8/D1/D2.
- These uses are anticipated to include: children's day nursery/community facility, international art centre, alternative healthcare facility, office suites, residents' management office, gym, restaurants and café.



## Heritage

- The Consented Scheme included a demolition strategy focused on the retention of the earliest buildings and removal of several later additions.
- This proposal adopts the Consented Scheme's demolition strategy with a few alterations. The Production Hall, Silos, Grain House, and Boiler House with chimney are all being retained whilst the administration buildings, Manufacturing Hall, and appended silos all detract from the quality of the original buildings – as well as the viability of the site for development – and are subject to consented demolition.

## Design Evolution

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3.4 The current proposal has evolved to encapsulate a long history of research, design iterations, and planning consultations. It assimilates important parameters from the Consented Scheme and from the Broadwater Road West SPD's Masterplan Framework, while embodying a new design brief focused on feasibility and the value of the public realm. The vision for the development is to deliver a viable residential-led new civic quarter that will enrich and enliven Welwyn Garden City that will serve as an impressive gateway to the town.

3.5 At the first pre-application consultation in August 2017, it was proposed that there would be 1,491 residential units with 31% (464) affordable housing units. The community use floorspace was proposed to be 12,858m<sup>2</sup> with 1,140 car parking spaces located across the site. At the second preapplication meeting in September 2017, the number of residential units had dropped to 1,471 but

with the same provision of affordable housing (31% [equating to 450 homes]). The community use floorspace remained the same whilst the number of car parking spaces was reduced to 1,125. At the third and final pre-application consultation meeting, the proposed number of residential units was 1,453. 440 (30%) of these would be affordable housing units, whilst the community use floorspace was reduced to 12,348m<sup>2</sup> and a market demand for extra care living was identified. The provision of car parking was again reduced to 1,113 spaces.

3.6 Over the course of three formal pre-application planning consultations and numerous other consultations with stakeholders, the proposed scheme has evolved both in terms of design and technical quality as well as in response to stakeholder involvement. Key changes that have emanated through the iterative process include:

- Provision of new community facilities, including a gym and swimming pool;
- Improvements to the layout of the Production Hall, with a focus on the connections with the public realm;

- Revisions to the massing of the residential blocks, focusing on townscape variety and legibility;
- Revisions to the project brief, focusing on viability;
- Revisions to the leisure offer, based on the viability of refurbishing the listed buildings, particularly the silos;
- Introduction of public art as an essential element of the public realm, and arts facilities as new destinations;
- New concept for sensory gardens, designed for universal access and enjoyment, with a focus on disabled users and;
- Emphasis on the monumental facades of the factory buildings.

3.7 Whilst the above summarises the evolution of the design, a more comprehensive assessment detailing the nature of design change can be found in the Design and Access Statement.

### **Phasing**

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3.8 The site is large and complex with the requirement for two developers to implement their respective schemes. Due to the location and sensitive nature of the existing buildings, a co-ordinated approach is required.

3.9 Accordingly, the scheme proposes a Phasing Plan that will enable a first tranche of development dominated by Listed Building restoration and affordable housing construction.

## 4. COMPARING THE CONSENTED SCHEME AND PROPOSED SCHEME

### Introduction

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4.1 In 2015, Spen Hill Developments Ltd (the former applicants) submitted a planning application for the redevelopment of the former Shredded Factory site. The scheme, which was consented, proposed the following:

- New build and change of use to include up to 850 dwellings, workspace, a healthcare facility, a hotel, Class A1, A3 and A4 units and a community building;
- The demolition of non-original silos and factory and the refurbishment and change of use of the original silos, Production Building, Grain Store and Boiler House;
- The provision of landscaping to include a linear park, a Multi-use Games Area (MUGA), allotments, green walls and a neighbourhood square; and
- Highway works, to include the widening of footways and the provision of cycleways to Broadwater Road and Bridge Road, together with works to Hyde Way and the erection of a new footbridge from Bridge Road leading directly into the scheme.

4.2 The differences between the two schemes in regard to the quantum of development are detailed in the subsequent table:

**Table 4.1 – Consented Scheme vs. Proposed Scheme**

Component	Consented Scheme	Proposed Scheme
Residential Units	850	1,340
Extra Care Units	0	114
Affordable Housing Units	50	414
Affordable Housing Percentage	6%	31%

Commercial and Community Floorspace	14,359m <sup>2</sup>	14,531m <sup>2</sup>
Car Parking	1,023	1,135

4.3 The main changes can be summarised as follows:

#### North Site

- An enhanced community core within the heart of the development to create increased public performance space, art uses, museum and health centre;
- Amplification of employment strategy for the site through introduction of WeWork within Listed Building to provide focus for small and new start-up businesses;
- Removal of Hotel use;
- Provision of 114 assisted living units
- Reworking of design strategy to the north, west and east of the Listed Building in the north site to optimise the development potential of the site, whilst creating a more appropriate design response to the Listed Building, elevating residential yield from 357 to 811 units;
- New residential block to the north of Listed Building;
- Enhanced focus given to front (eastern elevation) of Listed Building through enhanced boulevard and landscape setting; and
- Densification of townhouse areas into apartment blocks, consistent with the predominant and defining urban form to the east of the Listed Building.

#### South Site

- Retention of residential blocks in same approximate locations as south site masterplan and within same height parameters;
- Removal of residential block in south-eastern corner of south site to create a public square against the Listed Building; and
- More efficient and buildable residential blocks to increase south site dwelling yield from 493 to 654 units, in order to facilitate delivery of 414 affordable homes; and

- Inclusion of specialist tenure, over-55's affordable retirement homes.

## Parking

- Increase in parking provision across the site and an increase in cycling provision and the provision of electric car club vehicles for residents, through a decrease in the parking ratio per dwelling from 1.02 to circa 0.7.

## Evaluation

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- 4.4 Although it is recognised that elements of the development are markedly different to the consented scheme, the general principles and concepts which underpinned the consented scheme have been retained.
- 4.5 The provision of 1,340 high quality residential units will make a vital contribution towards acute local and strategic housing objectives and lead to the immediate delivery of affordable homes through MHT's interest in the site. This is a significant benefit in the light of Welwyn Hatfield's pressing housing need and the role of the local planning authority in fulfilling that need.
- 4.6 The increase in residential units from 850 to 1,340 would suggest an increase of circa 70% residents on-site. However, the proposed scheme has been strategically re-designed to focus a greater quantum of 1-bed and 2-bed units and a reduction in family housing to reflect the characteristics of the location. It is therefore calculated that there will only be a 29% increase in the number of residents residing at the site compared to the consented scheme.
- 4.7 Whilst the previous scheme included a larger number of family-sized dwellings, the proposed scheme concentrates on providing for young professionals and elderly downsizers, hence 1-bed and 2-bed units predominating the dwelling mix. This mix of units is considered to be more fitting given the highly urbanised and central location of the site and education capacity limitations.
- 4.8 Furthermore, it is considered thousands of larger family units will be delivered through new garden suburbs and settlement extensions, which dominate the Council's emerging development strategy.
- 4.9 The proposed scheme also contains a significant uplift in respect of affordable housing. Under the consented scheme, of the 850 residential units only 50 would be affordable. This equates to an affordable housing provision of 6%. Under the proposed scheme, the development will provide 414 affordable housing units, which will equate to an on-site provision of 31% affordable housing. The social benefits of the proposed scheme are therefore considered to be far greater than the consented scheme.



- 4.10 The mix and tenure of affordable (and market) housing has been selected to both respond to policy objectives in respect of providing mixed and balanced communities and ensuring overall housing delivery. The development is considered to include the maximum viable and deliverable quantum of affordable housing, and this will be delivered in a form and manner that will facilitate the immediate regeneration of a vitally important development site in the District.
- 4.11 In regard to commercial floorspace, the difference between the two schemes is not significant. In terms of overall quantum, however, the proposed scheme is considered to have evolved and will provide a wide range of community and employment facilities and will facilitate increased economic development in Welwyn Garden City in both the short and long term as a result. The scheme is now considered to have the potential to be a significant employment centre in its own right in a vibrant location that will facilitate and maximise sustainable living and working.
- 4.12 In regard to landscape, the landscape proposals continue to be underpinned by a coherent vision that draws upon the principles and qualities of the existing Garden City and the site's location, heritage, character and the wider setting of Welwyn Garden City. This vision formed the basis of the Consented Scheme and has been carried through to inform the current landscape masterplan.

## 5. PLANNING POLICY

- 5.1 Although the Government's NPPF and Planning Practice Guidance (PPG) are an important material consideration to be taken into account in determining planning applications, the planning Acts confirm that the 'Statutory Development Plan' should be the starting point for such decisions. In this respect, Section 38(6) of the 'Planning and Compulsory Purchase Act 2004' (the Act) states:

*'If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts, the determination must be made in accordance with the plan unless material considerations indicate otherwise.'*

- 5.2 The relevant Development Plan in this instance comprises the Welwyn Hatfield District Plan (adopted in 2005), the Hertfordshire Minerals Local Plan (adopted in 2007) and the Hertfordshire Waste Local Plan (adopted in 2012). Supporting Supplementary Planning Documents (Removal of residential block in southeastern corner of south site to create a public square against the listed building) are also relevant to the proposals and can be material planning considerations.
- 5.3 It is noted that the draft Welwyn Hatfield Local Plan was submitted to the Planning Inspectorate in May 2017. The Examination in Public (EiP) commenced in October 2017 and the applicant is not aware of any objections having been made to the application site being allocated for residential-led mixed-use development. Once the draft Local Plan has been formally adopted, it will be the key planning

document used by the Council when considering planning applications on this site and will supersede the existing Local Plan. In the interim, given that the draft Local Plan is at an advanced stage of the Plan process and there is little or no objection or opposition to the application site being brought forward for the development proposed, the draft Plan should be afforded reasonable weight in the Local Planning Authority's determination of this planning application.

### **National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG)**

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5.4 This section provides an overview of the Government's national planning policy and guidance that are of relevance to the proposed development.

5.5 The Government's national planning policies are set out in the NPPF published in March 2012. It contains the Government's policies for planning in England.

5.6 The PPG was subsequently launched online by the 'Department for Communities and Local Government (DCLG) in March 2014, which is designed to accompany the NPPF. It is the Secretary of State's view on how the NPPF's policies should be used in practice and to provide further information. The PPG is actively managed by the DCLG and is frequently updated.

### **Achieving Sustainable Development**

5.7 Paragraph 7 identifies that there are three dimensions to sustainable development:

- 'An economic role – contributing to building a strong, responsive and competitive economy';
- 'A social role – supporting strong, vibrant and healthy communities'; and
- 'An environmental role – contributing to protecting and enhancing our natural, built and historic environment'.

### **The Presumption in Favour of Sustainable Development**

5.8 The NPPF is an important material consideration in decision making and must be considered when determining any planning application. At the heart of the NPPF is a presumption in favour of sustainable development and Paragraph 14 states:

*'At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both planmaking and decision-taking...For decision-taking this means:  
  
approving development proposals that accord with the development plan without delay; and*

*where the development plan is absent, silent or relevant policies are out-of-date, granting 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; or*

*specific policies in this Framework indicate development should be restricted.'*

- 5.9 An assessment of the proposed development in the context of the presumption in favour of sustainable development is provided in Section 6 of this Statement. In our opinion, the application proposal constitutes sustainable development and accords with the Development Plan.

#### Core Planning Principles

- 5.10 Paragraph 17 sets out the Government's 12 principles for what planning should achieve. These include:

- 'Proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made to objectively identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth';
- 'Always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings';
- 'Encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value'; and
- 'Actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable'.

#### Design and Visual Impact

- 5.11 Paragraph 56 of the NPPF recognises that the Government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.

- 5.12 Paragraph 001 of the PPG recognises that achieving good design is about creating places, buildings, or spaces that work well for everyone, look good, last well, and will adapt to the needs of future generations.
- 5.13 Paragraph 58 of the NPPF stipulates that planning policies and decisions should aim to ensure that developments:
- Will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development.
  - Establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit.
  - Optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses and support local facilities and transport networks.
  - Respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation.
  - Create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion.
  - Visually attractive as a result of good architecture and appropriate landscaping.
- 5.14 Paragraph 60 stipulates that planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles. It is, however, proper to seek to promote or reinforce local distinctiveness.
- 5.15 Paragraph 63 as well as paragraph 004 of the PPG states that in determining applications, great weight should be given to outstanding or innovative design which help raise the standard of design more generally in the area.
- 5.16 Paragraph 64 of the NPPF states that planning permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.
- 5.17 Design matters will be addressed in Section 7 of this Planning Statement.

#### Historic Environment

- 5.18 Paragraph 128 of the NPPF stipulates that in determining planning applications, LPAs should require an applicant to describe the significance of any heritage assets affected, including

any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum, the relevant historic environment record should have been consulted. Where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, LPAs should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

- 5.19 Paragraph 129 requires that LPAs should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset). In terms of the definition of 'setting of a heritage asset', the glossary of the NPPF defines this as:

*'The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.'*

- 5.20 And that 'significance' (for heritage policy) is defined in the glossary of the NPPF as:

*'The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting.'*

- 5.21 Paragraph 013 of the PPG recognises that the extent and importance of setting is often expressed by reference to visual considerations. Although views of or from an asset will play an important part, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust, and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. Furthermore, the contribution that setting makes to the significance of the heritage asset does not depend on there being public rights or an ability to access or experience that setting.
- 5.22 Paragraph 133 stipulates that where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, LPAs should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss.
- 5.23 Paragraph 134 states that where a development will lead to less than substantial harm to the significance of a heritage asset, this harm should be weighed against the public benefits of the proposal.



- 5.24 Detailed heritage justifications are set out in Section 7 of this Statement and in the Heritage Impact Assessment (HIA) which supports the heritage section of the submitted Environmental Impact Assessment.

### Transport

- 5.25 Paragraph 32 of the NPPF stipulates that all developments that generate significant amounts of movement should be supported by a Transport Statement or Transport Assessment. Indeed, paragraph 004 of the PPG recognises that Transport Statements are a 'lighter-touch' evaluation (compared to the thorough assessment contained in Transport Assessments) to be used where this would be more proportionate to the potential impact of the development (i.e. in the case of developments with anticipated limited transport impacts). It further outlines that development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe. The applicants have submitted a detailed and robust Transport Impact Assessment (TIA) in support of the application.
- 5.26 Given the nature of the proposal, there will be traffic generated by the development, however the impact will not be severe, and a similar detailed package of off-site works as the consented

scheme is proposed to address the predicted 29% increase in population that will be generated as a result of the application in comparison with the consented scheme.

- 5.27 Section 7 of this Planning Statement summarises why the scheme is acceptable in transport terms, whilst a full Transport Impact Assessment has been submitted in support of the application.

### Affordable Housing

- 5.28 In respect of affordable housing, paragraph 50 of the NPPF aims to significantly boost the supply of housing and states that where local planning authorities have identified that affordable housing is needed, they should set policies for meeting this need on-site, unless off-site provision or a financial contribution of broadly equivalent value can be robustly justified. Such policies should be sufficiently flexible to take account of changing market conditions over time.
- 5.29 Indeed, paragraph 50 of the NPPF states the following:

*To deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, local planning authorities should: - plan*

*for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes);*

- identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand; and*
- where they have identified that affordable housing is needed, set policies for meeting this need on site, unless off-site provision or a financial contribution of broadly equivalent value can be robustly justified (for example to improve or make more effective use of the existing housing stock) and the agreed approach contributes to the objective of creating mixed and balanced communities. Such policies should be sufficiently flexible to take account of changing market conditions over time.*

5.30 Paragraphs 173 to 177 relate to 'Viability and Deliverability'. The second half of paragraph 173 states:

*'To ensure viability, the costs of any requirements likely to be applied to development such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing development to ensure the development be deliverable.'*

5.31 In addition to this, the NPPF states at paragraph 204 that planning obligations should only be sought when they meet all of the following tests:

- Necessary to make the development acceptable in planning terms;
- Directly related to the development; and
- Fairly and reasonable related in scale and kind to the development.

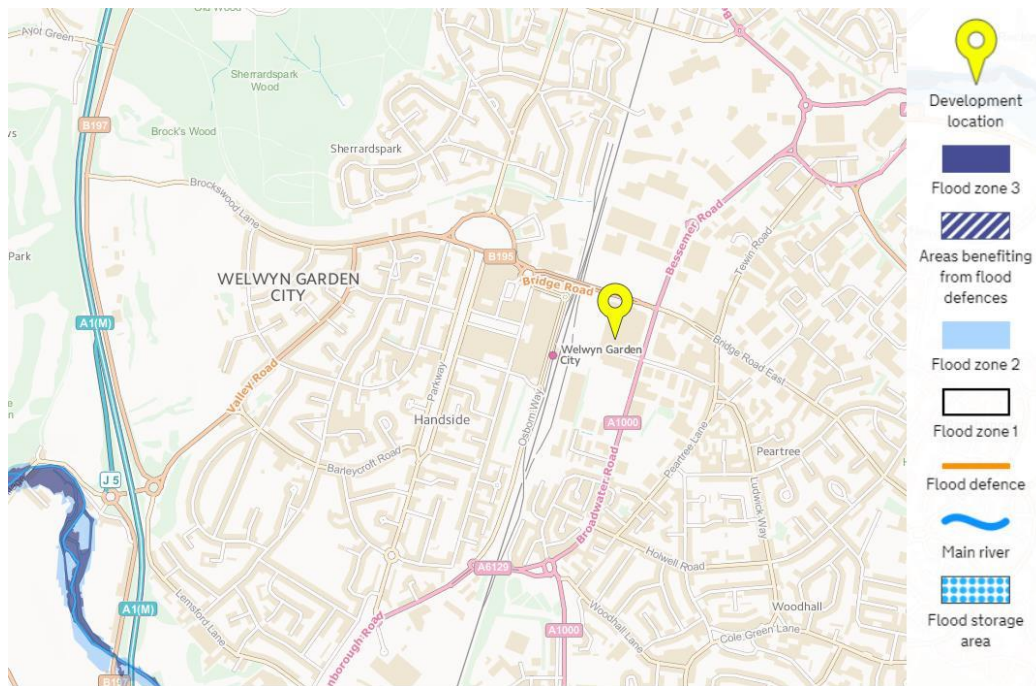
5.32 The consented scheme provided just 6% affordable housing provision across the site (50 units out of 850 units approved) and this was justified in viability terms. The application scheme is able to deliver a Development Plan policy compliant quantum of affordable housing (31%) through a mixture of affordable rent, shared ownership and over 55s affordable rental tenure housing. The significant increase in affordable housing has been achieved through a Joint Venture that brings in MHT as the registered provider, careful redesign to achieve a greater density of residential development across the site and bringing forward a level and mix of affordable housing that can attract HCA funding to secure a policy compliant quantum of affordable. The submitted Affordable Housing Statement

demonstrates why the scheme is acceptable in affordable housing terms and this is summarised in Section 7 of this Statement.

### Flooding

- 5.33 Paragraph 100 of the NPPF stipulates that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere. It is notable that given the proposed development is not on Flood Zones 2 or 3, the need to demonstrate the Sequential Test and/or Exception Test are not required.
- 5.34 Paragraph 103 states that when determining planning applications, LPAs should ensure flood risk is not increased elsewhere and that within the site, the most vulnerable development is located in areas of lowest flood risk unless there are overriding reasons to prefer a different location. In addition, the NPPF as well as paragraph 054 of the PPG states that development should be appropriately flood resilient and resistant, including safe access and escape routes where required and that any residual risk can be safely managed, including by emergency planning and it gives priority to the use of sustainable drainage systems.
- 5.35 According to the Environment Agency Flood Map, the entirety of the site is situated within 'Flood Zone 1', which is recognised as an area of least probability of flooding (i.e. land assessed as having a less than 1 in 1000 annual probability of river or sea flooding [ $<0.1\%$ ]). This is shown on **Figure 4.1**, below:

**Figure 4.1 – Environment Agency Flood Map**



5.36 According to the NPPF, a site-specific Flood Risk Assessment (FRA) is required for proposals of 1 hectare or greater in Flood Zone 1. As our site area is above this threshold, an FRA has been submitted in support of the application and this has informed the EIA on flooding contained in the submitted ES.

### Ecology

5.37 Paragraph 109 of the NPPF states that the planning system should contribute to and enhance the natural and local environment by.

- Protecting and enhancing valued landscapes, geological conservation interests and soils.
- Recognising the wider benefits of ecosystem services.
- Minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt that overall decline in biodiversity.

5.38 Paragraph 118 states that when determining planning applications, LPAs should aim to conserve and enhance biodiversity by applying principles such as opportunities to incorporate biodiversity in and around developments should be encouraged. In addition, planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including

ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss.

5.39 Given the highly urbanised nature of the site, the existing ecological value of the site is, unsurprisingly, low. There are no statutory or non-statutory designated sites of nature conservation importance within the site, with the nearest being Sherrardspark Wood Local nature Reserve (LNR), approximately 875m to the north-west. The nearest non-statutory designated site is Twentieth Mile Bridge Allotments County Wildlife Site (CWS) approximately 220m to the south/south west. It is considered that neither the LNR nor the CWS will be affected either during or post construction. The site does not contain any definitive Habitat(s) of Principal Importance in

England, listed under Section 41 of the Natural Environment and Rural Communities Act (2006) (NERC). Three faunal species listed as being 'Species of Principal Importance in England' were recorded within the site during the survey work that was undertaken as part of the extant Planning Permission, however it is considered highly unlikely that any local populations of these three species are reliant upon the site.

5.40 As such, it is considered that that the proposals would not have a negative impact on the natural environment or on existing biodiversity features on the site. In fact it is considered that the proposals, once fully implemented, would serve to improve the biodiversity characteristics of this part of the town.

### Summary

5.41 Overall, the proposal accords with the objectives of the NPPF by maximising urban renewal and consolidating development on a previously developed site to provide high quality housing options and a new civic quarter underpinned by community and business floorspace that is ideally connected to public transport, shopping, open space and recreation facilities. The proposal is highly sustainable, as identified within Section 6 of this Planning Statement, and therefore should be approved without delay in accordance with Paragraph 14 of the NPPF.

### **Welwyn Hatfield Development Plan**

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5.42 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that all applications for planning permission be determined in accordance with the Development Plan unless material considerations indicate otherwise.

5.43 The LPA is required to determine planning applications in accordance with the Development Plan unless material considerations indicate otherwise. The relevant Development Plan in this instance comprises the Welwyn Hatfield District Plan (adopted in 2005), the Hertfordshire Minerals Local



Plan (adopted in 2007) and the Hertfordshire Waste Local Plan (adopted in 2012). Supporting Supplementary Planning Documents (SPD) are also relevant to the proposals and can be material planning considerations.

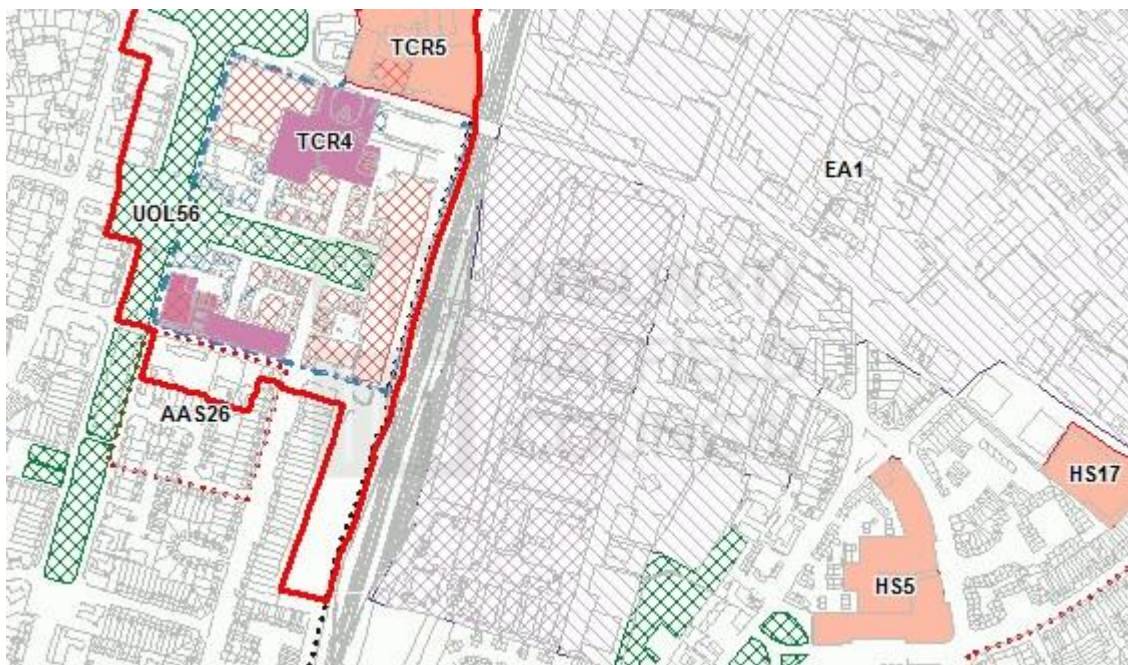
#### **Welwyn Hatfield District Plan (2005)**

5.44 The Welwyn Hatfield District Plan was adopted in April 2005 and is part of the Development Plan for Welwyn Hatfield. The Plan sets out policies and specific proposals for the development and use of land to guide planning decisions.

5.45 The District Plan was automatically saved for three years after its adoption. Following this, a request was made to the Secretary of State to save some policies beyond this period. This request was agreed in April 2008 and the District Plan continues to be part of the Development Plan. A number of policies were not saved however this was because they duplicated government policy and were therefore no longer necessary. In practice, the remaining policies will remain extant until superseded by a future Development Plan Document, with weight given to policies based on the extent/degree of compliance with the NPPF.

5.46 As shown in **Figure 4.2**, the adopted Local Plan Proposals Map extract reveals that the site lies within Welwyn Garden City and is also allocated within designation EA1 (Employment Land, shown with purple crosshatching).

**Figure 4.2 – Welwyn Hatfield District Plan Proposals Map**



5.47 Site EA1 is formed of the, now redeveloped, Taylor Wimpey residential development located immediately south of the application site and the Pall Mall storage and distribution premises to the west, as well as the application site.

## Summary of Key Policies

*GBSP2 – Towns and Specified Settlements:* This policy details the defined towns and settlements in the Borough.

*SD1 – Sustainable Development:* Development proposals will be permitted where it can be demonstrated that the principles of sustainable development are satisfied and that they accord with the objectives and policies of the Plan.

*R1 – Maximising the use of Previously Developed Land:* In order to make the best use of land in the district, the Council will require development to take place on land which has been previously used or developed.

*R2 – Contaminated Land:* The Council will encourage proposals for the development and reuse of land which is or may be contaminated.

*R3 – Energy Efficiency:* Development should include measures to maximise energy conservation through the design of buildings, site layout and provision of landscaping and incorporate the best practical environmental option for energy supply.

*R4 – Renewable Energy Sources:* Planning permission will be granted for proposals for the development of renewable energy sources providing they meet the criteria detailed in the Local Plan.

*R5 – Waste management:* The Council will require applications for larger schemes to include details of the measures to be taken in the design, construction, operation, occupation and demolition of existing buildings on site to minimise, recycle, treat and correctly dispose of waste wherever possible.

*R10 – Water Conservation Measures:* New development will be expected to incorporate water conservation measures wherever applicable, including sustainable drainage systems, water storage systems, soft landscaping and permeable surfaces to help reduce surface water run-off.

*R11 – Biodiversity and Development:* All new development will be required to demonstrate how it would contribute positively to the biodiversity of the site.

*R18 – Air Quality:* The Council will have regard to the potential effects of a development on local air quality when determining planning applications.

*R19 – Noise and Vibration Pollution:* Proposals must not generate unacceptable levels of noise and vibration.

*R27 – Demolition of Listed Buildings:* Listed Building Consent for the complete or partial demolition of any building of special architectural or historic interest will only be granted under exceptional circumstances.

*R29 – Archaeology:* Where a proposal for development may affect remains of archaeological significance, or may be sited in an area of archaeological potential, developers will be required to undertake an archaeological assessment.

*M1 – Integrating Transport and Land Use:* Every opportunity will be taken to integrate different modes of travel.

*M2 – Transport Assessments:* Developers of major new traffic generating developments will be required to submit a transport assessment with the planning application

*M3 – Green Travel Plans:* All new development at or above the thresholds set out in HTCOA's guidance on 'Developing a Green Travel Plan', should be supported by a Green Travel Plan.

*M4 – Developer Contributions:* Where development necessitates alteration to existing or the provision of new transport infrastructure or services, permission will be granted only if those works are environmentally acceptable and if the applicant agrees to meet, or where appropriate contribute to, the cost of the works or services.

*M5 – Pedestrian Facilities:* Wherever possible and practical the Council will seek improvements in facilities for the safe and convenient movement of pedestrians.

*M6 – Cycle Routes and Facilities:* Proposals for new development to encourage cycling through the inclusion of safe cycle routes and parking for cycles.

*M8 – Powered Two Wheelers:* The Council supports the use of powered two-wheeled vehicles as a more environmentally friendly mode of transport than the car.

*M9 – Bus and Taxi Facilities:* The improvement of passenger transport services throughout the district will be supported.

*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.

*IM2 – Planning Obligations:* In order to satisfy the sustainability aims of the Plan and secure the proper planning of the area, development will be required to provide for the infrastructure, services and facilities which are directly related to it and necessary to the granting of planning permission.

*D1 – Quality of design:* The Council will require the standard of design in all new development to be of a high quality.

*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.

*D3 – Continuity and Enclosure:* All new development will incorporate the principles of continuity and enclosure to distinguish between public and private spaces

*D4 – Quality of the Public Realm:* New development where appropriate will either create or enhance public areas and the public realm.

*D5 – Design for Movement:* New development will need to take account of its impact on existing and proposed movement patterns and will be required to make provision for pedestrian, cyclist and passenger transport facilities.

*D6 – Legibility:* The Council will require all new development to enhance and contribute to the legibility of the development itself and of the area in which it is located.

*D7 – Safety by Design:* The Council requires the design of new development to contribute to safer communities, to help with the reduction of the fear of crime.

*D8 – Landscaping:* All development, other than changes of use of buildings, should include landscaping as an integral part of the overall design.

*D9 – Access and Design for people with disabilities:* All new development should be designed to allow access by the disabled, young children in prams and pushchairs and those who are temporarily disabled through accident or injury.

*D10 – Public Art:* The Council will expect developers to include, as appropriate, the provision of an element of public art within proposals for new development.

*D11 – Design Statements:* A design statement for business, commercial or residential developments will be required.

*TCR1 – Retail in Town Centres and Edge of Town Centres:* New retail development must be located in accordance with the sequential approach set out in government guidance on retailing and town centres.

*TCR3 – Out of Centre Retail Development:* Proposals for new retail development in out-of-centre locations, including the extension of existing retail stores, will not be granted unless the criteria in the Plan can be satisfied.

*H1 – New Housing Development:* The sites identified in the District Plan are allocated for development during the plan period.

*H6 – Densities:* The Council will require all residential developments of 5 or more dwellings to be built at densities of 30 to 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.

*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. The provision, as a minimum, should be 30%.

*H10 – Accessible Housing:* In all residential developments involving 5 or more dwellings the Council will seek to secure a proportion of dwellings to be built to lifetime homes standard.

*OS3 – Play Space and Open Space in residential development:* Substantial new residential development will be expected to make a contribution to the provision of children's play space and informal open space.

*EMP2 – Acceptable Uses in Employment Areas:* In the designated employment areas, proposals for development within Use Classes B1, B2 and B8 will be permitted providing it meets the criteria detailed in the Plan.

*EMP3 – Mixed use Development at Broadwater Road West:* Policy EMP3 is of particular significance, as this policy identifies the site for mixed use development, consisting primarily of employment, housing, leisure and rail-related uses. In addition to this, EMP3 stipulates that the development of the site shall be in accordance with a Development Brief which would be set out in a Supplementary Planning Document (SPD).

## **Relevant Supplementary Planning Guidance**

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### **Broadwater Road West Supplementary Planning Document**

5.48 The Broadwater Road West SPD, which was produced in 2008 to support Policy EMP3 of the District Plan, identifies the site as an area of opportunity for mixed use development. It sets out a framework for the sustainable regeneration and redevelopment of the site. The Broadwater Road SPD establishes the broad amounts, type and mix of development that should be delivered on the site, as

well as identifying design and layout constraints, and other requirements that need to be addressed as part of the redevelopment process. **Figure 4.3** identifies the location of the site.

**Figure 4.3 – Broadwater Road West Site Location Plan**



5.49 The SPD sets out the Council's vision for Broadwater West as:

*'To deliver an energetic and pioneering scheme of development which integrates the spirit of the garden city with the very best of high quality 21st Century design, seizing the opportunity to enhance the local environment and create a sustainable, supported neighbourhood of an appropriate scale, which successfully integrates with the local community.'*

5.50 The SPD identifies what are considered to be the key elements of a masterplan framework for this site, in particular mixed use blocks, a new residential community, employment close to the railway station, community and youth facilities, leisure opportunities, affordable housing, retention and refurbishment of listed structures, acknowledging industrial heritage, echoing the spirit of the Garden City, promoting Eco-city ideas, maximising energy efficiency, promoting water efficiency, a balanced approach to car parking, new bridge to the town centre, encourage east-west links, provide on-site

recycling and Combined Heat and Power (CHP), a grid form and hierarchy of routes, provision for older children, young children's play, public space and community parks.

- 5.51 This is an extensive list of objectives for the site, prepared approximately 9 years ago. Whilst these objectives are of some age, many are still highly relevant as part of the overall objective of delivering a successful mixed use development on this site. However, it should be borne in mind that the wider site that is subject to the SPD has effectively been broken up and cannot be redeveloped holistically in the way that the SPD envisaged.

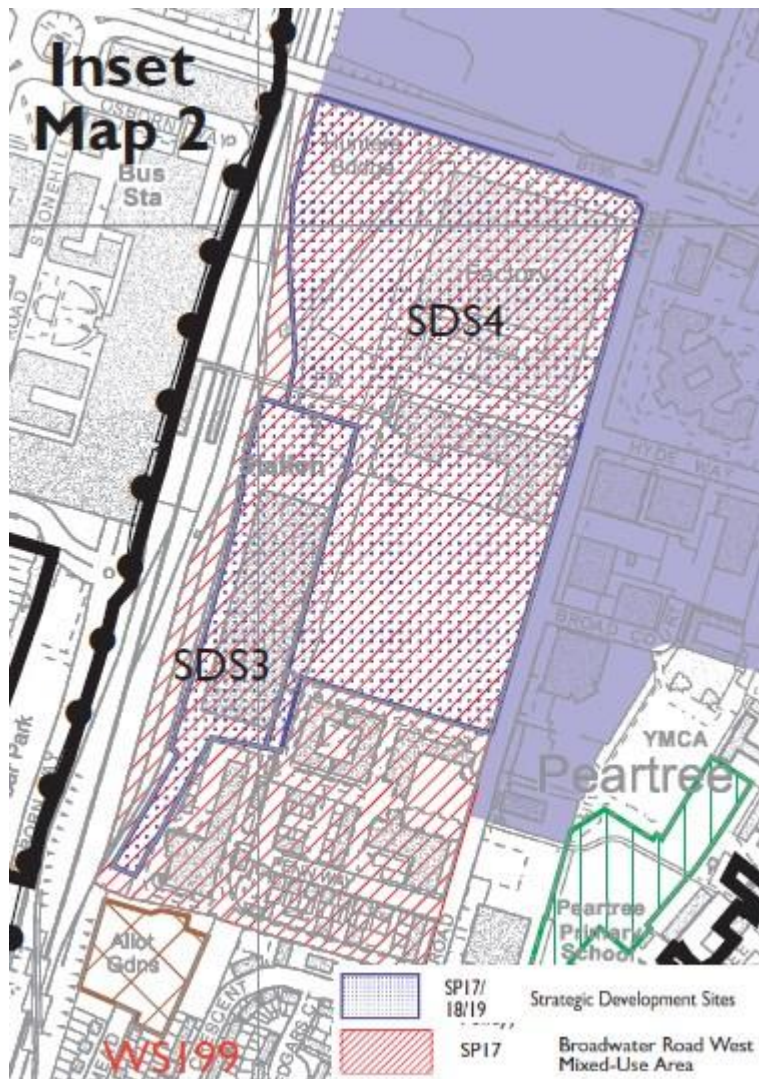
#### **Draft Welwyn Hatfield Local Plan**

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- 5.52 It is noted that the draft Welwyn Hatfield Local Plan was submitted to the Planning Inspectorate in May 2017. The most recent Examination in Public Hearing took place in October 2017. Once the 'Emerging' Local Plan has been formally adopted, it will be the main planning document used by the Council when considering planning applications. It will cover the period to 2032 and includes the strategy, proposed level of development and a number of planning policies.
- 5.53 Given that the draft Local Plan is at an advanced stage of the Local Plan review process, and is anticipated to be formally adopted by Spring 2018, it should be afforded a reasonable degree of weight in the Local Planning Authority's determination of any planning application.
- 5.54 The draft Local Plan identifies land to deliver circa 12,000 new dwellings between 2013 and 2032. This target equates to an average of 637 dwellings a year between 2013 and 2032, however the target is staged at a rate of 498 dwellings per year between 2013/14 and 2021/22 (4,485 over 9 years) and 752 dwellings per year between 2022/23 and 2031/32 (7,515 over 10 years). However, it should be noted the housing target outlined in the emerging Local Plan falls short of the full Objectively Assessed Need range of between 12,616 and 13,433.
- 5.55 As shown on the draft Policies Map of the Local Plan, the site is demarcated as a Strategic Development Site and as the Broadwater Road West Mixed-Use Area. This is detailed in **Figure 4.4** below:



**Figure 4.4 – Draft Welwyn Hatfield Local Plan Proposals Map**



### Key Policies

*SP 1 – Delivering Sustainable Development:* The Local Plan seeks to facilitate sustainable development.

*SP 2 – Targets for Growth:* The Council will support levels of employment, housing and retail growth which are consistent with the vision and objectives of this strategy and the principles of sustainable development.

*SP 3 – Settlement Strategy and Green Belt Boundaries:* The primary focus for new development will be in and around the two towns of Welwyn Garden City and Hatfield.

*SP 4 – Transport and Travel:* The Plan places emphasis on promoting the use of sustainable modes of travel and on improving safety for all highway users.



*SP 5 – Quantity and Location of Retail Development:* The Council will support the provision of additional retail floorspace to meet forecast expenditure growth to 2026 in the defined retail centre hierarchy.

*SP 6 – Community Services and Facilities:* The Council will make sure that communities can easily access a range of community services and facilities.

*SP 7 – Type and Mix of Housing:* In order to deliver a choice of homes and help create sustainable, inclusive and mixed communities, provision will be made for a range of housing to support the needs and requirements of different households.

*SP 8 – The Local Economy:* The Council will support economic prosperity, encourage inward investment and the creation of a range of jobs by following the measures outlined in the Plan.

*SP 9 – Place Making and High Quality Design:* Proposals will be required to deliver a high quality design that fosters a positive sense of place.

*SP 10 – Sustainable Design and Construction:* Proposals that adopt sustainable design and construction principles will be supported.

*SP 12 – Strategic Green Infrastructure:* The Council will actively support the creation and enhancement of strategic green infrastructure.

*SP 13 – Infrastructure Delivery:* To support the delivery of sustainable communities, the Council will ensure that suitable provision is made for new or improved infrastructure.

*SP 15 – The Historic Environment of Welwyn Garden City:* Proposals for new development should protect, conserve and where appropriate enhance its heritage assets.

*SP 17 – Mixed-use Development Site at Broadwater Road (SDS3/Pea02b and SDS4/Pea02c):* Land at Broadwater Road West is allocated for development to accommodate 1,020 new homes over the plan period. Mixed use development on this site will comprise primarily employment, housing, leisure and rail-related uses. Development on this site will comply with the Broadwater Road West SPD.

*SADM 2 – Highway Network and Safety:* Development proposals will be permitted provided they do not have an adverse impact on the local and/or strategic transport network, highway safety and facilitate safe and suitable means of parking and access.

*SADM 3 – Sustainable Travel for All:* All developments at or above the thresholds set out in Hertfordshire County Council's Hertfordshire Travel Plan Guidance will be required to submit a Travel Plan.

*SADM 4 – Development in Designated Centres:* Within the defined boundaries of designated centres the Council will support proposals for new development or changes of use, subject to them not having a detrimental impact on the vitality and viability of that centre.

*SADM 7 – New and Existing Community Services and Facilities:* The Council will support the provision of new community services and facilities where appropriate.

*SADM 10 – Employment Development:* The area of land identified as EA1 in the existing District Plan will be retained in this Local Plan for employment development under Class B and associated land uses.

*SADM 11 – Amenity and Layout:* 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 Planning Guidance.

*SADM 12 – Parking, Servicing and Refuse:* The type and quantum of vehicle and cycle parking provided within development proposals will be informed by the standards set out in the Council's parking standards. Appropriate provision of service areas and refuse storage and collection areas should be made according to the nature of the development.

*SADM 13 – Sustainability Requirements:* 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.

*SADM 14 – Flood Risk and Surface Water Management:* Flood Risk Assessments will be required in line with national policy.

*SADM 15 – Heritage:* Proposals which affect designated heritage assets should consider the points listed in the Plan.

*SADM 16 – Ecology and Landscape:* Proposals will be expected to maintain, protect and wherever possible enhance biodiversity and conserve and enhance the Borough's natural and historic landscape.

*SADM 18 – Environmental Pollution:* The Council will strive to ensure that pollution will not have an unacceptable impact on human health, general amenity, critical environmental assets or the wider natural environment.

*SADM 21 – Housing Allocations in Welwyn Garden City:* In accordance with policies SP 2 and SP 3, the Shredded Wheat site has been allocated for residential-led mixed use development.

### **Five Year Land Supply**

5.56 At the Welwyn Hatfield Local Plan Examination-in-Public (EIP) Hearing Sessions, several respondents claimed that the Council does not presently have, or is struggling to demonstrate to have, a five-year land supply of housing in the District at this time.

5.57 In response to this, the Council highlighted that they do consider that a five-year land supply is met, and specifically highlighted early delivery of the application site for an increased amount of homes which could help to bolster the Council's position.

5.58 It is our contention that the Council needs to deliver more housing to address a potential housing delivery problem and that the application site is critical to the Council's strategy for boosting housing delivery in the District over the coming years.

## **6. SUSTAINABLE DEVELOPMENT**

6.1 Paragraph 14 of the NPPF reaffirms the presumption in favour of sustainable development. It requires development proposals that accord with the Development Plan to be approved without delay.

6.2 The second chapter of the NPPF details how sustainable development can be achieved. Paragraph 6 of the NPPF outlines that the policies in Paragraphs 18 to 219, when taken as a whole, constitute the Government's view of what sustainable development means for the planning system. Paragraph 7 stipulates that there are three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles:

- An economic role – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;
- A social role – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and
- An environmental role – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources

prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy.

6.3 The Framework states that the three roles are mutually dependent and should not be taken in isolation.

6.4 The following section of this report provides an assessment of the relevant economic, environmental and social policies and objectives contained in the NPPF and assesses the subject site and the proposed development against these criteria.

### **Economic Role**

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6.5 The proposed development will lead to positive benefits for the local economy during the construction of the development and post construction, when the housing is occupied.

6.6 The proposed development will increase population to support and boost the economy. The new homes will accommodate a growing workforce which will deliver economic output and new residents will also spend more locally. The UK average annual household expenditure on convenience (food), comparison (non-food), and leisure goods and services is as follows:

□ Convenience - £4,727 per household per annum; □ Comparison - £7,077 per household per annum; and □ Leisure - £6,390 per household per annum.

Based on the proposed development providing 1,400 dwellings, this could generate an annual convenience goods expenditure of £6,617,800, comparison goods expenditure of £9,907,800 and expenditure of leisure goods and services of £8,946,000. This gives a total expenditure of £25,471,600 per annum generated by the proposed development.

6.7 There will also be a number of significant benefits in the short-term, resulting from the physical undertaking of the proposed development including direct and indirect jobs generated and sustained during the construction period.

6.8 The additional residents of 1,400 dwellings will increase demand for, and use of local services and businesses in Welwyn Garden City. The increased demand and spending will help maintain and enhance the services available and accessible within the area and increase their viability.

6.9 The proposed commercial uses on site will facilitate increased economic activity in the Borough and will go some way to helping the Council achieve its targets in terms of economic development, as outlined in the draft Local Plan.

6.10 Furthermore, the redevelopment of this site will help to provide long-term employment opportunities through the creation of a range of commercial uses. This is considered to be beneficial to not just the site, but the entire Borough.

6.11 The Council will receive a New Homes Bonus and Council Tax Revenue as a result of the proposal which provides a source of revenue for the local authority to deliver services, local infrastructure and facilities.

### **Social Role**

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6.12 The proposed development will deliver 1,400 new homes of different tenures and sizes and, crucially, is a previously-developed site. Brownfield sites provide opportunities to raise housing densities to optimise brownfield land capacity, thus reducing the need for Green Belt land release.

The re-use of this particular site is considered to be a sustainable means of maximising brownfield land delivery and achieving greater brownfield: greenfield land ratios in the District. Furthermore, the delivery of an additional 1,400 residential units will go some way to helping the Local Authority to deliver sufficient homes to meet their housing need, and the proposal will improve the housing land supply position.

6.13 The provision of a mix of unit sizes will facilitate the creation of a mixed community as part of the proposed development, which is highly desirable from a sustainability perspective. The mix of dwelling sizes provides housing for people at different stages of life.

6.14 The proposed development also includes a range of commercial and community uses which will further facilitate social interaction.

6.15 The public and private amenity spaces will provide opportunities for informal recreation needs that will contribute towards the development of a healthy community. This secures significant health and recreation benefits for residents as well as providing opportunities and spaces for informal and formal meeting and community participation, which helps to generate a sense of place and community.

6.16 The heavily-landscaped nature of the proposal will provide places for social interaction and further promote active recreation, healthy lifestyles and access to the wider locality.

6.17 The proposal brings back to use a dormant site that is currently in the process of being cleared for future development. This proposal will therefore revitalise a vacant site and will improve passive

surveillance, safety and security outcomes across the site and surrounds, and improve overall amenity of the area.

- 6.18 The impact of mixed-use development on this site on surrounding developments has been considered within the design of the proposal, and therefore it is unlikely that any significant adverse social impacts will occur to the amenity of adjoining neighbours as a result of the proposal.

### **Environmental Role**

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- 6.19 The proposal ensures that the future growth of both Welwyn Garden City and the Welwyn Hatfield Borough area accord with the adopted and emerging Local Plan by supporting growth within the existing settlement boundaries and maximising urban consolidation and urban renewal objectives by making best use of a brownfield site. The development will facilitate the delivery of a high quality mixed-use development on a site which is well connected to employment, public transport, shopping, entertainment, community facilities and social infrastructure.

- 6.20 The site is well located in regard to public transport, retail and employment services and facilities. In transport terms, the site is extremely well connected, being located directly adjacent to the railway station and the bus station. As a result of the site's proximity from these public transport stations, it is highly likely that future residents will utilise sustainable modes of travel thus culminating in a reduced reliance on the car. However, the development will still provide sufficient vehicle storage facilities in order to provide residents with the flexibility to use the car should they require it. This site is clearly one that should be prioritised for development based on the above, as per Paragraphs 29-41 of the NPPF.

- 6.21 The development proposes considerable landscaping both internally and along the boundaries of the site, and these measures will significantly improve the appearance and amenity of the site when viewed from the public domain, providing an attractive gateway into the town centre and softening the view of the development from established residential dwellings and other significant viewpoints.

- 6.22 The proposal has been designed with appropriate mitigation measures to ensure that all new residential occupiers will not be adversely affected by noise generated from surrounding roads or railway.

### **Sustainable Development Scorecard**

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- 6.23 Using the Sustainable Development Scorecard, which was developed by the Sustainable Development Commission, we have identified that the proposed development has a sustainability rating of 87%.

- 6.24 The Sustainability Score defines how closely the proposals conform to the NPPF's definition of sustainable development. This represents a combined score from each of the three pillars; economic, social and environmental, with a maximum score of 100%. As each of the three pillars are considered

to be equal in the eyes of the NPPF, they are all weighted equally, meaning that no individual pillar can score more than 33.33%.

6.25 The Sustainable Development Scorecard Assessment of this particular proposal is provided at **Appendix 1**.

## **7. DETAILED MATERIAL PLANNING CONSIDERATIONS**

### **Principle of Development**

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7.1 National and local planning policy emphasise presumption in favour of sustainable development. The subject site represents a highly sustainable location within walking distance from public transport options, retail and commercial services, social infrastructure, open space and recreation facilities. The proposal itself also presents a highly sustainable development outcome by providing high quality mixed-use development on previously-developed land, with a diverse quantum of residential development to support housing choice for future residents. The residential units have been designed above the standard design requirements in terms of size in order to support downsizing and to provide flexibility for potential occupants. There are also significant economic, social and environmental benefits associated with the proposals which have been outlined in Section 6.

7.2 The development proposal aligns with the requirements of the site allocation and Local Plan policies, and is therefore acceptable in principle and should be approved without delay in accordance with Paragraph 14 of the NPPF.

7.3 The site is a vacant brownfield site in a highly sustainable location and which is, in principle, suitable for a mixed-use redevelopment. The policy approach established by the District Plan, SPD documents and draft Local Plan acknowledge this and accordingly the site forms the larger part of the Broadwater Road West redevelopment site identified as suitable for mixed-use redevelopment. Part of the site has already been redeveloped, comprising the Taylor Wimpey redevelopment on the southern part of the site. The Pall Mall warehousing site to the west, abutting the railway is neither within the applicant's control nor within the current application site but is within the SPD area.

7.4 As such, the principle of development at the site has been established.

### **Design and Layout**

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7.5 The architectural design of the individual buildings responds to the context within the site and beyond. ColladoCollins have developed an approach that draws on many of the characteristics of the local context, yet have still sought to be innovative and ambitious by designing a scheme that is of the highest quality.

7.6 The Design and Access Statement and accompanying suite of plans, prepared by ColladoCollins Architects provides a detailed design analysis of the proposals.



## **Landscaping and Open Space**

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7.7 The application is accompanied by a Landscaping Design Statement prepared by Bradley Murphy Design. In summary the design objectives for the landscape strategy are underpinned by the Garden City principles and the Local Authority's vision for the Broadwater Road site, which have both shaped and influenced the masterplanning process. The site offers an opportunity to provide a high quality, mixed use scheme creating a vibrant new community at the heart of Welwyn Garden City, helping to redefine the former Shredded Wheat Factory site and provide much needed housing, community facilities and additional open space. The brief for the public realm and landscape strategy has evolved as part of the masterplanning process and centres around a modern interpretation of the Garden City.

7.8 The landscape strategy has developed with and in response to key stakeholders and consultees and is stronger for it. The scheme delivers a bespoke, sustainable and high quality landscape designed to characterise the development, provide a long term landscape and ecological resource and contribute to the integration of the development in the wider Welwyn Garden City.

## **Transport and Parking**

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7.9 The transport and parking strategy is set out in the Transport Statement prepared by Entran.

## **Impact on the Character of the Surrounding Area**

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7.10 The NPPF emphasises the importance of good design within the built environment and Policy RLP 90 of the Local Plan requires all new development to reflect or enhance local distinctiveness with respect to scale, density, height and massing, and promote safe and secure environments and enhance natural surveillance.

7.11 The proposal has been carefully designed to respond to the streetscape, height and design of development in the surrounding locality, as identified within the Design and Access Statement prepared by ColladoCollins Architects Design. The proposal provides a mix of housing types and diverse range of commercial and community uses to support a mixed community. Furthermore, the range of styles will help to generate a sense of place and character. The design, layout and scale is sympathetic to the nearby quantum of development, and as such it is considered that the development is not incongruous or out of character.

## **Contamination**

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7.12 Further information in respect of ground conditions and contamination is provided in the Environmental Impact Assessment.

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### **Heritage**

7.13 The proposal seeks to retain the most important aspects of the Shredded Wheat Factory, from an architectural and historic perspective. The original complex of buildings, as created in the 1920's, represented a significant pioneering development that was unashamedly modern and radically different from any previous factory buildings. It was also consciously different from the style of architecture being adopted elsewhere. The expansion of the factory after this period was not of the same quality and generally detracted from the importance and setting of the original buildings. The scheme proposes the demolition of all of the post-1920's buildings and the reinstatement of original parts and features lost over time. The restored original building will be a clear statement, as Louis de Soissons intended, to reflect changing attitudes in society to our approach to the working environment.

7.14 The interventions to the listed buildings, to bring them into a new use, are designed in a way to minimise any visual impact. The principal spaces within the buildings are still legible; it is particularly appropriate that the production building, constructed as a new workplace building in the 1920's, will be brought back into use. Additionally, the ancillary buildings around it will provide facilities for hospitality and leisure. The heritage importance of the original factory buildings is a key component of the proposals, becoming a centre piece that is celebrated in a series of key views and the principal spaces.

7.15 A detailed Heritage Statement prepared by KM Heritage has been submitted in support of this application. This assesses, in detail, the heritage assets and their significance; an assessment of the impact of the proposals on the assets and their setting and provides a detailed justification for the balance struck in the proposals between the economic, social and environmental issues arising. Please refer to this document for detailed considerations.

### **Archaeology**

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7.16 An Archaeological Desk-Based Assessment of the site has been carried out and it was found that recorded archaeological features within the site are of only limited heritage value, and the potential for significant archaeological remains is considered to be very limited. The assessment has not identified any recorded archaeological remains considered to be of such significance to influence or preclude development and the proposed development is not considered to be contrary to national or local planning policy.

## **Ecology**

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- 7.17 Further information in respect of ecology is provided in the Environmental Impact Assessment.

## **Sustainability and Energy**

- 7.18 The application is accompanied by a Design and Access Statement, prepared by ColladoCollins Architects, and a Sustainability and Energy Assessment, prepared by Sol Environmental. These detail the design approach and ethos. Please refer to these for more detailed considerations.

## **Drainage**

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- 7.19 Further information in respect of ecology is provided in the Environmental Impact Assessment.

## **Flood Risk**

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- 7.20 According to the Environment Agency Flood Map, the entirety of the site is situated within 'Flood Zone 1', which is recognised as an area of least probability of flooding (i.e. land assessed as having a less than 1 in 1000 annual probability of river or sea flooding [ $<0.1\%$ ]).

- 7.21 According to the NPPF, a site-specific Flood Risk Assessment (FRA) is required for proposals of 1 hectare or greater in Flood Zone 1. As our site area is above this threshold (1.19ha in total), an FRA has been submitted in support of the application and is provided as part of the Environmental Impact Assessment.

## **Affordable Housing**

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- 7.22 The provision of 1,340 high quality residential units will make a vital contribution towards acute local and strategic housing objectives. This is a significant benefit in the light of Welwyn Hatfield's pressing housing need and the role of the local planning authority in fulfilling that need.
- 7.23 The development maximises affordable housing provision in accordance with project viability and development specific considerations. This is a significant local benefit supporting the development.
- 7.24 The mix and tenure of affordable (and market) housing has been selected to both respond to policy objectives in respect of providing mixed and balanced communities and ensuring overall housing delivery. The development includes the maximum viable and deliverable quantum of affordable housing. The scheme provides an important entry point to intermediate housing for local people in

Welwyn Hatfield and makes a significant affordable housing contribution towards Welwyn Hatfield's housing targets.

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7.25 MHT is joint applicant for the application and is a proven affordable housing partner, with a very successful track record of working in the local area. In addition, both applicants have experience of delivering developments in Welwyn Hatfield and will progress the scheme diligently and expeditiously to begin construction later in 2018.

7.26 For these reasons the proposed quantum and mix of affordable housing proposed at the application site is consistent with the objectives and requirements of policy and represents a significant local benefit.

7.27 However, further information and justification is identified in the Affordable Housing Statement, which has been prepared by Icení Projects.

### **Daylight/Sunlight**

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7.28 A Daylight/Sunlight Assessment has been prepared by Entran and should be read in conjunction with this Planning Statement.

### **Noise and Vibration**

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7.29 Further information in respect of ecology is provided in the Environmental Impact Assessment.

### **Air Quality**

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7.30 Further information in respect of air quality is provided in the Environmental Impact Assessment.

### **Section 106 Agreement**

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7.31 A Section 106 Agreement will be entered into as part of any future planning permission and it is anticipated that similar topic issues/matters addressed in the existing consent will be covered through a future Section 106, such as:

- Library Contribution
- Youth Contribution
- Education Contribution
- Travel Plan
- Waste and Recycling
- Parking Survey and CPZ Implementation

- Outdoor Sports and Recreation
- Railway Bridge
- Community Centre
- Childcare
- Healthcare
- General Medical
- Allotments; and
- Highway Agreement for off-site works

### **Summary**

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7.32 The planning issue topics identified above have been assessed against relevant planning policy to demonstrate the acceptability of the scheme. The main planning issues affecting are detailed above and, if not dealt with in this Planning Statement, will be supported by further documentation as set out above and in Section 1 of this document.

## **8. CONSULTATION**

8.1 The purpose of this section of the Planning Statement is to detail the pre-application consultation undertaken by the applicant with Welwyn Hatfield Borough Council, members of the public, and all relevant stakeholders in respect of the current proposals. A Statement of Community Involvement prepared by Marengo Communications accompanies this planning application and details the consultation undertaken with the local authority and community.

### **Pre-Application Advice**

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8.2 This proposal has been the subject of numerous pre-application meetings with both Hertfordshire County Council and Welwyn Hatfield Borough Council and has been the subject of an iterative design process.

8.3 At the first pre-application consultation in August 2017, it was proposed that there would be 1,491 residential units with 31% (464) affordable housing units. The community use floorspace was proposed to be 12,858m<sup>2</sup> with 1,140 car parking spaces located across the site. At the second preapplication meeting in September 2017, the number of residential units had dropped to 1,471 but with the same provision of affordable housing (31% [equating to 450 homes]). The community use floorspace remained the same whilst the number of car parking spaces was reduced to 1,125. At the third and final pre-application consultation meeting, the proposed number of residential units was 1,453. 440 (30%) of these would be affordable housing units, whilst the community use floorspace was reduced to 12,348m<sup>2</sup> and a market demand for extra care living was identified. The provision of car parking was again reduced to 1,113 spaces.

8.4 Over the course of three formal pre-application planning consultations and numerous other consultations with stakeholders, the proposed scheme has evolved both in terms of design and technical quality as well as in response to stakeholder involvement.

8.5 The pre-application process has ultimately helped to shape the proposed development detailed in this Planning Statement.

### **Public Exhibition**

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8.6 A public exhibition was held at the Howard Centre in Welwyn Garden City between 4pm and 8pm on Wednesday 22<sup>nd</sup> November and 2pm and 7pm on Thursday 23<sup>rd</sup> November. A preview for Councillors was held between 2pm and 4pm on Wednesday 22<sup>nd</sup> November.

8.7 Over 440 residents, stakeholders and councillors attended and 107 feedback forms were received. Overall, the proposals were well-received, however any issues have been taken into consideration and examined prior to the submission of the application.

### **Summary**

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8.8 Plutus Estates (WGC) Limited and Metropolitan Housing Trust's commitment through the consultation process has been demonstrated in a way that meets the requirements of the Council's Statement of Community Involvement. The engagement has been over and above what is set out in the Council's SCI. This level of engagement has meant that Plutus Estates (WGC) Limited and Metropolitan Housing Trust are now in a position to fully understand the issues from residents and stakeholders which has helped to finalise their plans. With hundreds of responses and contact details now logged, we are confident that we have a sound platform for ongoing engagement. We welcome the overt

support of approximately 75% of respondents (of those who chose to answer the question) relating to the plans. Importantly this consultation has helped Plutus Estates (WGC)

Limited and Metropolitan Housing Trust understand local people's views, which have been reflected in their response to the feedback they have received. Plutus Estates (WGC) Limited and Metropolitan Housing Trust are keen to continue to keep people informed on progress on this project and intend to keep existing communication channels open to enable that dialogue to continue after the planning application has been considered.

## **9. CONCLUSIONS**

9.1 The application site is an underutilised brownfield site in a central and highly sustainable location that is badly in need of regeneration and renewal. The proposal activates the site and seeks a signature scheme that will deliver significant economic, social and environmental benefits and a high-quality outcome for all parties and stakeholders with an interest in the site.

9.2 The application scheme has evolved from the extant planning permission granted for mixed-use development in August 2017, which itself had been based around adopted and emerging Local Plan designations and the 2008 Broadwater Road West SPD. The application scheme is considered to be a more appropriate redevelopment solution for the site, which responds positively to major planning challenges for the District, including:

- The end of a period of long term neglect of a major and high profile gateway site to the town, through the creation of a new and vibrant mixed-use, residential-led civic quarter
- Significant and immediate housing delivery on brownfield land to address a short-term housing delivery problem in the District, which threatens a 5 year land supply shortfall;
- Significant affordable housing delivery, including an additional 364 affordable homes over and above the level secured through the extant planning permission
- A better and more appropriate balance of smaller residential units on a centrally located site to complement the Council's emerging planning strategy, which is dominated by family housing developments at settlement edges
- The establishment of a new civic quarter, underpinned by significant employment and community floorspace, to create a new destination to live and work in the heart of the town



in order to achieve more sustainable commuting patterns, with the potential for new businesses to be established at the site to reduce the levels of outflows of workers to London and Cambridge

- 9.3 The scheme is supported by an Environmental Statement and Transport Impact Assessment, which demonstrate that the scheme does not have significant adverse effects on the environment, with suitable mitigation measures identified to enable the development to be successfully delivered in full within a 4 year period.
- 9.4 The planning application accords with the Development Plan for the area and has been demonstrated to deliver a plethora of economic, social and environmental benefits. Accordingly, it is respectfully requested that planning permission be granted for the development.

**APPENDIX 1 – SUSTAINABLE DEVELOPMENT SCORECARD  
ASSESSMENT**



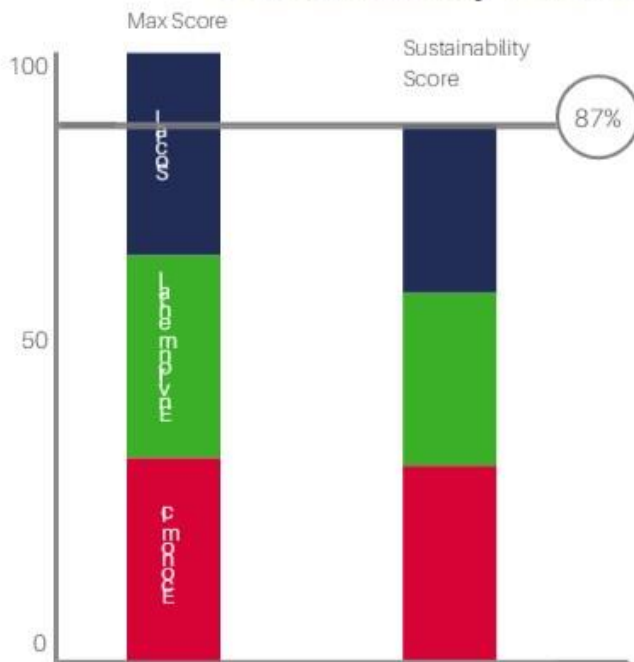
## Sustainability Report – Report No – 85120 -

ADVICE: This report is intended to provide you or third parties with an indication of the extent to which a development conforms to the National Planning Policy Framework's definition of sustainable development, and is based on you quality of your inputs. The Sustainable Development Commission and Iceni Projects accepts no liability for any loss or damage which may be suffered by other parties as a direct or indirect result of using the Scorecard (including loss of profit, loss of opportunity, loss of business, and consequential loss).

Technical support: [info@thescorecard.org.uk](mailto:info@thescorecard.org.uk)

Development:	Shredded Wheat
User ID:	85120

## Sustainability Score

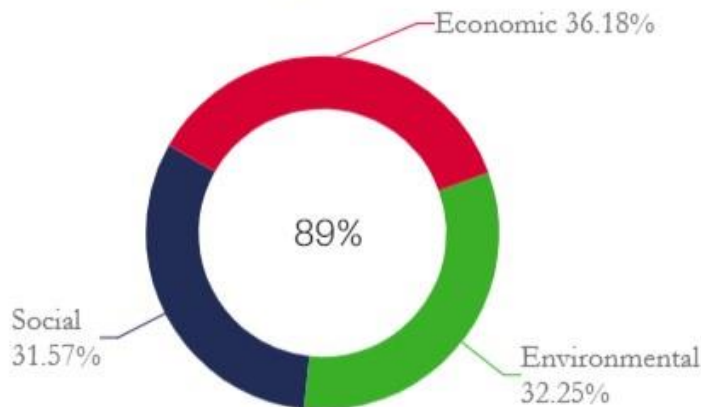


## The Sustainability Score

The Sustainability Score defines how closely the proposals conform to the NPPF's definition of sustainable development. This represents a combined score from each of the three pillars; economic, social and environmental, with a maximum score of 100%. As each of the three pillars are considered to be equal in the eyes of the NPPF, they are all weighted equally, meaning that no individual pillar can score more than 33.33%. Different numbers of statements for each pillar

means some statements are worth more to the Sustainability Score than others.

## Parity Score



## The Parity Score

The Parity Score assesses how equally the three pillars are balanced. This is intended to highlight where equal consideration has been given to each of the three pillars, which again reflects the approach defined by the NPPF. The maximum Parity Score is 100%, representing a completely balanced representation of each of the three pillars, regardless of the Sustainability Score.

## Continued:

### Wayfinders

Question 1.

Is the site in a rural location?

Yes ☐ No ☒

Qualifier. (because of the previous answer we need clarification)

Is the site in a National Park, the Broads or Area of Outstanding Natural Beauty?

Yes ☐ No ☒

Question 2.

Is the site in an urban location, town centre or primary shopping area?

Yes ☒ No ☐

Question 3.

Does the site contain heritage assets, or is the site within the setting of heritage assets?

Yes ☒ No ☐

Question 4.

Is the site in a coastal area?

Yes ☐ No ☒

Question 5.

Does the site include areas of high flood risk?

Yes ☐ No ☒

Question 6.

Is the site adjacent to a Minerals Safeguarding Area, or in a Minerals Consultation Area?

Yes ☐ No ☒

Question 7.

Do the proposals include residential buildings?

Yes ☒ No ☐

Question 8.

Do the proposals include commercial buildings?

Yes ☒ No ☐

Qualifier. (because of the previous answer we need clarification)

Are the end users known?

Yes ☐ No ☒

Question 9.

Do the proposals include retail buildings?

Yes ☒ No ☐

Question 10.

Do the proposals include on-site renewable technologies?

Yes ☒ No ☐

Question 11.

Do the proposals include communications infrastructure?

Yes ☐ No ☒

Question 12.

Do the proposals develop open or recreational land?

Yes ☒ No ☐

Question 13.

Do the proposals include mineral extraction?

Yes ☐ No ☒

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Your Inputs

Statement 1: The proposals maximise water efficiency, especially when located in water-stressed areas.

Your Notes:

Pillar:

Score

Environmental

Neutral

Statement 2: A Travel Plan has been produced which promotes the use of sustainable travel options.

Your Notes:

Pillar:

Score

Environmental

Strongly  
Agree



Statement 3: The proposals have been designed to give priority to and encourage pedestrian and cycle movements across the site (where appropriate).

**Your Notes:**

**Pillar:**

Environmental

**Score**

Strongly  
Agree

Statement 4: The proposals include facilities for charging of electric vehicles.

**Your Notes:**

**Pillar:**

Environmental

**Score**

Strongly  
Agree

Statement 5: The proposals have been sited in close proximity to a sufficient amount of sustainable transport options for the intended use.

**Your Notes:**

**Pillar:**

Environmental

**Score**

Strongly  
Agree

Statement 6: The siting and design of the proposals facilitate the efficient delivery of goods, services and supplies and the collection of refuse.

**Your Notes:**

**Pillar:**

Economic

**Score**

Strongly  
Agree

Statement 7: The proposals maximise residential development in appropriately sited areas.

**Your Notes:**

**Pillar:**

Economic

**Score**

Strongly  
Agree

Statement 8: The proposals maximise potential for the retention, enhancement or creation of existing street markets.

**Your Notes:**

**Pillar:**

Economic

**Score**

Agree

Statement 9: Proposals within town centres maximise provision for town centre uses identified in the local plan.

**Your Notes:**

**Pillar:**

Economic

**Score**

Strongly  
Agree

Statement 10: Proposals for retail, leisure and office development will support the viability of the town centre (or, where not in a town centre or in accordance with a local plan, satisfy the sequential test and any necessary impact assessment and have been shown not to undermine centres).

**Your Notes:**

**Pillar:**

Economic

**Score**

Strongly  
Agree

Statement 11: All landscape and visual impacts of the proposed renewable and/or low carbon energy sources have been addressed and satisfied with all relevant parties.

**Your Notes:**

**Pillar:**

Social

**Score**

Agree

Statement 12: Local context and distinctiveness has been investigated and incorporated as much as possible as part of the proposal's design.

**Your Notes:**

**Pillar:**

Social

**Score**

Strongly  
Agree

Statement 13: The proposals provide the opportunity for users / occupiers to walk to essential facilities either within or outside of the site.

**Your Notes:**

**Pillar:**

Environmental

**Score**

Strongly  
Agree

Statement 14: All opportunities have been undertaken for the re-use, retention, and refurbishment of existing buildings.

**Your Notes:**

**Pillar:**

**Score**

Environmental

Agree

Statement 15: The proposals and any associated infrastructure are sited so as to have a minimal impact on surrounding areas of tranquillity.

**Your Notes:**

**Pillar:**

Social

**Score**

Agree

Statement 16: The proposals will minimise the adverse effect of noise on the health and quality of life of new users and local residents / users.

**Your Notes:**

**Pillar:**

Social

**Score**

Agree

Statement 17: The proposal will be designed to minimise impact on surrounding light pollution.

**Your Notes:**

**Pillar:**

Environmental

**Score**

Agree

Statement 18: The cumulative effects of the new development on air quality will be effectively minimised both during construction and operation.

**Your Notes:**

**Pillar:**

Environmental

**Score**

Agree

Statement 19: The proposals are appropriate in terms of adverse impact from pollution and land instability, and these risks have been considered and effectively minimised.

**Your Notes:**

**Pillar:**

Environmental

**Score**

Agree

Statement 20: The existing or firmly planned physical infrastructure of the area is sufficient to support the needs which the development will generate.

**Your Notes:**

**Pillar:**

Economic

**Score**

Strongly  
Agree

Statement 21: The proposal will provide housing that reflects the needs of different groups (considering size, type and tenure) in the local community (such as children, disabled users, older people, or those wishing to build their own homes) and is in line with the Local Plan's desired mix of housing

**Your Notes:**

**Pillar:**

Social

**Score**

Strongly  
Agree

Statement 22: The proposals maximise the provision of affordable housing based on locally identified need reflected in the policies of the local plan or other relevant needs assessments.

**Your Notes:**

**Pillar:**

Economic

**Score**

Strongly  
Agree

Statement 23: The proposals will sustain and enhance the significance of the identified heritage assets.

**Your Notes:**

**Pillar:**

Environmental

**Score**

Strongly  
Agree

Statement 24: The proposal's impact on any designated / non-designated heritage assets and their setting has been assessed by an appropriate expert in proportion to their identified significance.

**Your Notes:**

**Pillar:**

Environmental

**Score**

Strongly  
Agree

Statement 25: The proposals retain significant heritage assets and bring them back into viable use.

**Your Notes:**

**Pillar:**

Environmental

**Score**

Strongly  
Agree

Statement 26: The proposals support or constitute a community-led initiative for the development of renewable or low carbon energy.

**Your Notes:**

**Pillar:**

**Score**

Environmental

Agree

Statement 27: The proposals adequately adapt in a sustainable manner to the risk of internal overheating.



**Your Notes:**

**Pillar:**

Environmental

**Score**

Agree

Statement 28: The proposals connect to or create/expand a local decentralised energy network.

**Your Notes:**

**Pillar:**

Environmental

**Score**

Neutral

Statement 29: The proposals maximise best practice energy efficiency measures to both existing and new buildings on site.

**Your Notes:**

**Pillar:**

Environmental

**Score**

Agree

Statement 30: The proposals are within appropriate proximity to a range of employment opportunities needed by its occupiers.

**Your Notes:**

**Pillar:**

Economic

**Score**

Strongly  
Agree

Statement 31: The proposals support the implementation of the local economic strategy.

**Your Notes:**

**Pillar:**

Economic

**Score**

Agree

Statement 32: The proposals aid in the growth of the UK's renewable and low carbon industries.

**Your Notes:**

**Pillar:**

Economic

**Score**

Neutral

Statement 33: The development will contribute directly and indirectly to long-term local employment opportunities.

**Your Notes:**

**Pillar:**

Economic

**Score**

Strongly  
Agree

Statement 34: All publicly accessible spaces are well overlooked within the proposals.

**Your Notes:**

**Pillar:**

Social

**Score**

Strongly  
Agree

Statement 35: The proposals provide sufficient communal areas to facilitate social interaction outside the confines of the private areas.

**Your Notes:**

**Pillar:**

**Score**

Social

Strongly  
Agree

Statement 36: The proposal constitute a Community Right to Build Order.

**Your Notes:**

**Pillar:**

**Score**

Social

Strongly  
Disagree

Statement 37: The proposal's design takes account of the views of all applicable sections of the local community, and this can be adequately demonstrated through design development.

**Your Notes:**

**Pillar:**

**Score**

Social

Strongly  
Agree

Statement 38: The proposals constitute an outstanding or innovative design.

**Your Notes:**

**Pillar:**

**Score**

Social

Strongly  
Agree

Statement 39: A Crime Prevention Design Advisor has been consulted on the design of the proposals, and all recommendations have been incorporated.

**Your Notes:**

**Pillar:**

**Score**

Social

Agree

Statement 40: The proposals create a place with a locally inspired or otherwise distinctive character.

**Your Notes:**

**Pillar:**

**Score**

Social

Agree

Statement 41: The density of development has been optimised in line with the local character and context.

**Your Notes:**

**Pillar:**

**Score**

Social

Strongly  
Agree

Statement 42: The proposal's design enhances the streetscape and, where appropriate, allows social spaces to develop.

**Your Notes:**

**Pillar:**

**Score**

Social

Strongly  
Agree

Statement 43: The proposals will allow sufficient and adequate access for all potential users.

**Your Notes:**

**Pillar:**

Social

**Score**

Strongly  
Agree

Statement 44: The proposals sufficiently demonstrate that the existing open space and / or sports & recreational facilities are surplus to local requirements, or provide

complete replacement (both in terms of quantity and quality of provision).

**Your Notes:**

**Pillar:**

Social

**Score**

Neutral

Statement 45: It has been demonstrated that sufficient local school places are available to cater for the increased demand, and if not, provide for the creation of new or expanded educational establishments.

**Your Notes:**

**Pillar:**

Social

**Score**

Neutral

Statement 46: The proposals are within close proximity to a sufficient extent of high quality sports and recreation facilities, or if not, they create this.

**Your Notes:**

**Pillar:**

Social

**Score**

Agree

Statement 47: The proposals are within close proximity to a sufficient extent of accessible, high quality open space, or if not, they create this.

**Your Notes:**

**Pillar:**

Social

**Score**

Strongly  
Agree

Statement 48: The development provides (or is in close proximity to) the amenities and services needed by its expected users.

Your Notes:Pillar:Score

EconomicStrongly Agree

Statement 49: The proposals promote the development and / or enhancement of local services and community facilities.

Your Notes:

Pillar:

Score

Economic

Strongly Agree

Statement 50: The proposals create or significantly enhance locally-identified priority habitats / species and avoid damage to national/internationally designated wildlife sites.

**Your Notes:**

**Pillar:**

**Score**

Environmental

Neutral

Statement 51: The proposals create, maintain or enhance any planned or existing ecological / green infrastructure networks.

**Your Notes:**

**Pillar:**

**Score**

Environmental

Strongly  
Agree

Statement 52: The proposals maximise development on brownfield land of low biodiversity value.

**Your Notes:Pillar:Score**



Environmental Strongly  
Agree

Statement 53: The proposals provide overall net gains in biodiversity value.

**Your Notes:**

**Pillar:**

**Score**

Environmental

Agree

Statement 54: The proposals maximise the incorporation of green and/or blue space that directly aids in adapting to the effects of climate change.

**Your Notes:**

**Pillar:**

**Score**

Environmental

Agree

# How to improve your score

## Energy and Climate

In order to improve scores for energy and climate related issues, sustainability and energy consultants should be appointed as part of the design team. The proposals should seek to promote more energy efficient design of buildings and services. Passive design should be reviewed to improve U-values, air tightness and thermal bridging. Building services should be reviewed to improve the efficiency of systems, including heating, cooling, ventilation and lighting. Renewable and low carbon electricity and heat sources should also be adopted.

The risk of internal overheating for the proposals should also be fully addressed and demonstrated, using an appropriate methodology, seeking to mitigate this risk through the use of passive (non-energy consuming) means wherever possible.

If possible, the proposals should seek to connect to, or create, a decentralised energy network to provide low carbon heat and power to

proposed and neighbouring properties. If appropriate, the proposals should also promote the potential for community-led initiatives to generate renewable or low carbon energy.

## **Biodiversity**

In order to improve scores for biodiversity related issues, the proposals should seek to better develop the biodiversity strategy for the site, possibly with the assistance of a qualified ecologist. Additional areas of the site should be devoted to ecologically attractive habitat to increase biodiversity value, creating or enhancing green infrastructure, and addressing locally identified priority habitats and species.

Where already present on the site, the proposals should also seek to enhance blue or green space to act as a buffer against urban heat island effects.

## **Layout and Design**

In order to improve scores for the proposal's layout and design, the scheme should address a wide range of issues related to placemaking. The local context, character and density should be addressed within the proposals. Safe and accessible public spaces should be provided with active frontages to buildings. Wayfinding and access across the site and buildings for all potential users should be considered.

The proposals should also demonstrate that the views of all applicable sections of the community have been accounted for, with relevant feedback forming part of the design. If possible, the scheme should incorporate a Community Right to Build Order to ensure that community interests are represented in the proposals.