

27 May 2021



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Dear Sir or Madam,

**Former Shredded Wheat Factory Phase 1 (Planning Permission Reference: 6/2018/0171/MAJ)  
Non-material Amendment**

On behalf of our client, Metropolitan Thames Valley Homes, we submit an application pursuant to Section 96a of the Town and Country Planning Act 1990 (as amended) to make non-material amendments to the above planning permission granted on 15 February 2019. Submitted for approval via the Planning Portal are:

- Application Form;
- Design Updates Statement (May 2021), prepared by ColladoCollins;
- Amended Drawings (see schedule within letter) prepared by ColladoCollins
- Ground Landscape General Arrangement A0 (Dwg. No: SWP1-BMD-EXT-GND-GA-L01-002-D3-D5);
- Drawing Schedule (provided below).

The following plans have also been submitted for information purposes only:

- Site-wide Podium Ventilation Strategy (Dwg. No: SWP1-CCA-ZZ-GND-DET-A01-90.200 Rev C3)
- Podium Ventilation Panel Type (Dwg. No: SWP1-CCA-ZZ-GND-DET-A01-90.201 Rev C5)

The application fee of £234 plus £25 Planning Portal fee has been paid through the Planning Portal.

There is no statutory definition of 'non-material'. This is because it will be dependent on the context of the overall scheme – an amendment that is non-material in one context may be material in another. The local planning authority must be satisfied that the amendment sought is non-material in order to grant an application under section 96a of the Act.

A pre-application meeting attended by the applicant team, Clare Howe (WelHat Planning) , and Peter Dawson (Places Services – Urban Design) took place on 13 May 2021. The proposed changes were discussed at length and following the meeting the pre-application advice received on 14 May 2021 confirmed that the section 96a 'non-material' route was acceptable subject to adequate justification being provided.

In this case, the non-material amendments proposed relate to two blocks within the wider masterplan comprising of the "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 497 m<sup>2</sup> of health (Use Class D1), 497 m<sup>2</sup> of community use (Use Class D1), 883 m<sup>2</sup> of office (Use Class B1) and 590 m<sup>2</sup> of retail (Class A1/A2/A3/A4/A5); alterations, additions and change of use of Grade II Listed Building and retained Silos to provide 5,279 m<sup>2</sup> of flexible business floorspace (Use Class B1), 270 m<sup>2</sup> Combined Heat and Power (Sui Generis), 2,057 m<sup>2</sup> International Art Centre (Use Class D1), 1,235 m<sup>2</sup> Gymnasium (Use Class D2), 1,683 m<sup>2</sup> of restaurant/coffee shop/bar (Use Class A1/A3/A4/A5), Creche/Day Nursery (Use Class D1) of 671 m<sup>2</sup> as well as a Network Rail TOC Building (Use Class B1) of 360 m<sup>2</sup>; plus

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associated car parking, access, landscaping, public art and other supporting infrastructure.” It is within this context, that we consider the changes are of a scale and nature that would be considered non-material.

The changes proposed involve the minor reconfiguration of the approved spaces, and refinements to the detailed design to take account of building regulations requirements, Secure be Design Officer and technical input (i.e. M&E) and final specifications e.g. brick dimensions and lift specification. There is no change proposed to the height of the buildings, building footprint or number or mix of residential floorspace / units. The amendments along with the justification for the changes are provided below:

Amendments	Improvements / justification
<p><b>Removal of the brick hit and miss wall to carparks on the North and South Elevation of Block 10 and the North Elevation of Block 11, and replacement with perforated metal panels.</b></p>	<p>Achieves ventilation requirements that cannot be met using hit and miss façade treatment. Furthermore, it achieves improved safety by removing potential use of hit and miss to climb as recommended by the Designing Out Crime Officer. Details of the proposed ventilation strategy and panels proposed are included on drawing references:</p> <ul style="list-style-type: none"> <li>• SWP1-CCA-ZZ-GND-DET-A01-90.200 Rev C3</li> <li>• SWP1-CCA-ZZ-GND-DET-A01-90.201 Rev C5</li> </ul>
<p><b>CHP Flues amended on Block 11</b></p>	<p>The CHP flue height has been amended to take account of the approved energy strategy and to address air quality requirements. The change is due to completion of the detailed design, appointment of a third party ESCO (Switch 2) for the design and management of the energy centre, including the CHP and flue, along with the CHP plant being selected. The proposed finish is stainless steel which is durable and does not require regular maintenance. The stainless steel finish has not changed since the original planning approval.</p> <p>The flues are located away from the building frontage which limits their visibility. Additional views have been provided within the submitted Design Updates Statement (pages 30-33) which demonstrate that this small increase in height would not increase the visibility of the flues at street level to an extent considered to be ‘material’.</p>
<p><b>Edge protecting handrails around roof edge</b></p>	<p>The edge protecting handrails are required to address M&amp;E and Building Regulation requirements.. They will be a mild steel ballasted system set back 1m from the façade in RAL 7016 to match the windows. This will be consistent throughout the development.</p> <p>The proposed change to the handrails avoids the requirement to secure railing system into waterproofing on roof which could cause potential issues relating to water ingress at fixture points.</p>
<p><b>Various window types and positions updated</b></p>	<p>Limited changes have been made to the elevations to take account of the dimensions of the bricks. No changes have been made to the type or appearance of the bricks, as approved under condition 31.</p>

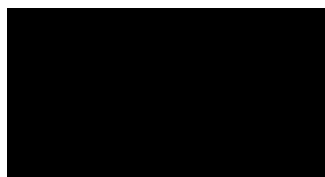
<p><b>Balcony positions updated following window positioning updates</b></p>	<p>The balcony positions have been amended to align with the various window position updates that have arisen to reflect the dimensions of the bricks. The proposed alignment remains as per the consented scheme and the proposed changes have not changed how the fenestration would be perceived.</p> <p>The plane of the glazing is set back on the balcony on the lower levels by some 1.5m and will be masked by the balustrade at these levels.</p>
<p><b>Rainwater pipes added to external facades</b></p>	<p>Added to the drawings to reflect the approved drainage strategy secured by condition 5.</p>
<p><b>Podium balustrade rail height raised by 600mm and layout updated</b></p>	<p>Balustrade has increased from the finished floor level of the block to include the increased landscaping depth at the edge of the podium to address Building Regulation requirements. The increase in height is related to tree pit depths and planting. Materials and colour will remain consistent throughout the development (mild steel in RAL 7016 to match windows) as approved under condition 31.</p>
<p><b>Lift overrun layouts updated</b></p>	<p>The lift overruns have been amended (and reduced in height compared to the approved overruns) to align with the internal reconfiguration and lift specification. The lift overruns are located centrally away from building façade and therefore visibility reduced.</p> <p>The roof overruns will be clad in the roofing membrane which is Bauder Single Ply Membrane. The actual roof finish is brown roof.</p>
<p><b>Brick vent locations added</b></p>	<p>Required to address discussions with the Council regarding ventilation and to meet Building Regulations. Air bricks approved under condition 31.</p>
<p><b>Gas Enclosure</b></p>	<p>Following discussions with the Gas supplier, it was confirmed that the gas meter must be located externally. As such, this has been proposed to be located next to Block 11. Adequate access will be provided, and screening will be provided around the gas meter to minimise visual impact within the streetscene.</p> <p>Please refer to submitted Ground Landscape General Arrangement A0 (Dwg. No: SWP1-BMD-EXT-GND-GA-L01-002-D3-D5) which provides specific details.</p>
<p><b>Internal layout changes to communal and plant areas</b></p>	<p>These minor changes (as listed in the design documents) do not alter the size or layout of the new homes. The changes have been made to address M&amp;E and Building Regulation requirements.</p>

Standalone drawings for Block 10 were not submitted (and thus not approved) as part of the 2019 planning permission, as Block 10 and 11 are identical in plan form. Therefore the drawings submitted to show the amendments, and those to be superseded (where relevant) are:

<b>Amended Drawings Submitted with NMA Application</b>	<b>Superseded Drawing</b>
P1(S)-110 Rev P6 - Block 11 A/B Ground Floor Plan	P1(S)-110 Rev P4
P1(S)-111 Rev P6 - Block 11 A/B First Floor Plan	P1(S)-111 Rev P4
P1(S)-112 Rev P6 - Block 11 A/B Typical Floor Plan	P1(S)-112 Rev P4
P1(S)-113 Rev P6 - Block 11 A/B Fourth Floor Plan	P1(S)-113 Rev P4
P1(S)-114 Rev P6 - Block 11 A/B Fifth Floor Plan	P1(S)-114 Rev P4
P1(S)-115 Rev P6 - Block 11 A/B Top Floor Plan	P1(S)-115 Rev P4
P1(S)-130 Rev P6 - Block 10 A/B Ground Floor Plan	N/A
P1(S)-130 Rev P6 - Block 10 A/B Ground Floor Plan	N/A
P1(S)-131 Rev P6 - Block 10 A/B First Floor Plan	N/A
P1(S)-132 Rev P6 - Block 10 A/B Typical Floor Plan	N/A
P1(S)-133 Rev P6 - Block 10 A/B Fourth Floor Plan	N/A
P1(S)-134 Rev P6 - Block 10 A/B Fifth Floor Plan	N/A
P1(S)-135 Rev P6 - Block 10 A/B Top Floor Plan	N/A
P3(S)-121 Rev P6 - 1/100 Elevations Block 11 Ext	P1(S)-121 Rev P4
P3(S)-122 Rev P6 - 1/100 Elevations Block 11 Ext	P1(S)-122 Rev P4
P3(S)-123 Rev P6 - 1/100 Elevations Block 11 Ext	P1(S)-123 Rev P4
P3(S)-124 Rev P6 - 1/100 Elevations Block 11 Int	P1(S)-124 Rev P4
P3(S)-125 Rev P6 - 1/100 Elevations Block 11 Int	P1(S)-125 Rev P4
P3(S)-131 Rev P6 - 1/100 Elevations Block 10 Ext	N/A
P3(S)-132 Rev P6 - 1/100 Elevations Block 10 Ext	N/A
P3(S)-133 Rev P6 - 1/100 Elevations Block 10 Ext	N/A
P3(S)-134 Rev P6 - 1/100 Elevations Block 10 Int	N/A
P3(S)-135 Rev P6 - 1/100 Elevations Block 10 Int	N/A
P3(S)-136 Rev P6 - 1/100 Elevations Block 10 Int	N/A

We trust that the application is in order and look forward to receiving confirmation that it has been validated, and approved within the 28 statutory determination period. In the meantime, if you have any queries or require any further information, please do not hesitate to contact me. We would also be happy to arrange a video-conference or tele-conference meeting with the design team should this be helpful in explaining the non-material amendments proposed.

Yours sincerely,



**Oliver Eves**  
**Savills**