
Planning Statement

Tewin Road,
Welwyn Garden City

Henry Boot Developments

September 2021

Planning Statement
Tewin Road, Welwyn Garden City
Henry Boot Developments

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CONTENTS

- 1.0 Introduction
- 2.0 Site Description and Surroundings
- 3.0 The Proposed Development
- 4.0 Planning History
- 5.0 The Development Plan
- 6.0 Material Considerations
- 7.0 Assessment of Application Proposals
- 8.0 Planning Balance and Conclusions

APPENDICES

Appendix 1: Site Location Plan

1.0 INTRODUCTION

1.1 This Planning Statement has been prepared by Barton Willmore LLP on behalf of Henry Boot Developments ('the Applicant') in support of an application to Welwyn Hatfield Borough Council ('WHBC') for full planning permission for the development of the former gasholders site at Tewin Road (the 'Site') for E(g)(iii), B2 and B8 uses.

1.2 A Site Location Plan is included at **Appendix 1** of this Planning Statement. The 'Application Site' covers an area of approximately 1.22 hectares of previously developed land and is situated in a strategic location within the well-established Mundells Industrial Area of Welwyn Garden City.

1.3 The Proposed Development comprises the construction of three high quality industrial units. Details of access, servicing, landscaping and boundary treatment are included as part of this application.

1.4 The Description of the Proposed Development is as follows:

"Development of the site for E(g)(iii), B2 and B8 Uses including details of access, servicing, landscaping and boundary treatment."

1.5 This Planning Statement has been prepared to provide a clear rationale for the grant of planning permission for the Proposed Development. It provides a description of the Site and its surroundings (Section 2); an explanation of the Proposed Development (Section 3); an overview of the Site's planning history (Section 4); an analysis of relevant policies within the development plan (Section 5) and other material considerations including the National Planning Policy Framework (NPPF) (Section 6); an assessment of the proposals including a summary of the findings of key technical assessments (Section 7); the planning balance and conclusions (Section 8).

1.6 The Planning Statement should be read in conjunction with the drawings, plans and documents that form part of the application package. In addition to the drawings and plans for approval (listed in the covering letter), these documents comprise the following:

- Design and Access Statement;
- Transport Assessment;
- Workplace Travel Plan;

- Flood Risk Assessment;
- Sustainable Drainage Strategy;
- Biodiversity Report;
- Heritage Statement;
- Arboricultural Implications Assessment;
- Phase 1 Geo-Environmental Assessment;
- Phase 2 Geo-Environmental Assessment;
- Economic Benefits Statement;
- BREEAM New Construction 2018 Industrial Tender Report;
- Building Regulations Part L and EPC Report; and
- Noise Assessment.

2.0 SITE DESCRIPTION AND SURROUNDINGS

- 2.1 The Site is located within Welwyn Garden City, within the confines of Welwyn Hatfield Borough Council, a town situated between Hatfield (to the southwest) and Hertford (to the east). The Site is situated in a strategic position within the well-established Mundells Industrial Area of Welwyn Garden City, benefiting from close proximity to Junction 4 of the A1 (M), with access to the wider national motorway network beyond.
- 2.2 The Site is roughly rectangular in shape, bounded to the east by Tewin Road from which the Site is accessed from Bridge Road East at the south and the A1000 to the north.
- 2.3 The Site is surrounded by a range of commercial and industrial buildings which comprise the Mundells Industrial Areas, and a number of retail uses including a café to the northeast of the Site and a large ALDI shop to the southwest. The Site is designated as an employment area under reference EA1 Welwyn Garden City Industrial Area in the adopted Local Plan (Policy EMP1).
- 2.4 The Site is currently occupied by a car dealership in the southern corner, alongside a small area of land currently in use as part of the adjoining ATS Euromaster car service centre. The remainder of the Site is currently cleared and unused land, having previously been in use as a gasholders site, which has been decommissioned and demolished.
- 2.5 The Site benefits from a range of transportation connections within close proximity. The A1(M) Junction 6 and Junction 4 are located circa. 6 and 10 minute drive from the Site respectively, providing access to London and the North. Welwyn Garden City Centre train station is circa. 650m from the Site, estimated at a 15 minute walk, providing services to Moorgate, London Kings Cross and Cambridge twice an hour. In addition, the Application Site is surrounded by multiple bus stops along Bridge Road East, Bessemer Road, and the A1000, which provides a service between Welwyn Garden City Centre and Panshanger.
- 2.6 The Site is located within Flood Zone 1, which is considered to be at a low risk of flooding.
- 2.7 There are no listed buildings on the Site. The nearest Listed heritage assets are The Nabisco Shredded Wheat Factory (Grade II) Listed Building approximately 450m south of the Site and Digswell Lodge (Grade II), which lies approximately 850m to the west of the Site. There are no Conservation Area designations that impact the Site.

3.0 THE PROPOSED DEVELOPMENT

3.1 The Description of Development is as follows:

“Development of the site for E(g)(iii), B2 and B8 Uses including details of access, servicing, landscaping and boundary treatment.”

3.2 The scheme includes the following elements:

Employment Units

3.3 The Proposed Development includes the construction of three new commercial units, as detailed on the submission drawings and accompanying Design and Access Statement (DAS). The proposed development will provide new flexible use units (E(g)(iii), B2 or B8 use) with associated plant, welfare and office space. By applying for flexibility across these uses, all of what are supported by the Local Plan, it helps to maximise the marketability of the new buildings, and to enable a wide range of potential occupiers to utilise the new buildings for employment-generating purposes with immediate effect.

3.4 A total of 6,394 sqm GIA employment space is to be created by the proposals, comprising 5,677 sqm GIA at ground floor with 716 sqm GIA ancillary office floorspace at first floor level. The proposed buildings cover approximately 51% of the Site (5,677sqm GEA over 1.12 ha). The built form is designed to achieve BREEAM Excellent.

3.5 The below table provides an overview of each of the proposed units:

| | Ground Floor Warehouse GIA (sqm) | First Floor Office & Ancillary GIA (sqm) | Total Floorspace GIA (sqm)* |
|----------------|---|---|------------------------------------|
| Unit 01 | 3,212 | 382 | 3,594 |
| Unit 02 | 1,047 | 149 | 1,196 |
| Unit 03 | 1,420 | 185 | 1,604 |
| Total | 5,679 | 716 | 6,394 |

** totals may not add due to rounding*

- 3.6 The application is proposed for 24 hour uses. Whilst the Site is not within the immediate vicinity of residential properties, the Site has been designed to prevent the escape of noise to adjacent properties through the arrangement and configuration of the built form.

Access

- 3.7 All of the units are accessed by two points of vehicular, cycling and pedestrian access from Tewin Road.
- 3.8 Vehicle tracking drawings support this application, demonstrating that the proposed access allows for the safe access and egress of all vehicles. This is discussed in detail within the accompanying Transport Assessment.

Servicing and Parking

- 3.9 The units benefit from parking and service yard arrangements, with a total of 71 parking spaces provided, 40 spaces for Unit 1 and 31 spaces for Units 2 and 3 combined. Parking provision will be clearly marked out, with separate parking areas allocated to each unit.
- 3.10 7 of the spaces (10%) provided across the site will be accessible bays, including 3 electric vehicle charging accessible bays. In total across the three units, a total of 15 electric vehicle charging bays (20%) will be provided.
- 3.11 A total of 36 cycle spaces are proposed within three separate sets of shelters directly outside the building entrances. These stores will be covered, secure and conveniently located.
- 3.12 Further detail is contained within the accompanying Transport Assessment.

Hard and Soft Landscaping

- 3.13 The application seeks the approval of hard landscaping details for the Site. The chosen materials have been carefully chosen to complement the new buildings and the new planting. The hard landscaping proposals include the materials for the access roads and servicing yards (cast concrete), parking (cast concrete and bitumen macadam) and paved areas (flag paving).
- 3.14 The soft landscaping proposals form an important element in the setting of the development, creating visual appeal and enhancing biodiversity on the Site. Detailed

planting layouts include the careful location and species selection of specimen trees, shrubs, hedges and grasslands, alongside a replacement tree along Tewin Road to replace one tree that is being lost to facilitate the southern access.

Boundary Treatment

- 3.15 Proposed landscaping strips along the eastern and western boundaries assist to demarcate boundaries alongside providing visual screening from adjoining properties.
- 3.16 In addition to landscape planting along the Site boundaries, the Proposed Development includes provision of a 2.4m high metal mesh paladin fence with polyester powder coated finish (coloured black).

Summary

- 3.17 The proposed development seeks to deliver a high-quality, modern and sustainable scheme for the Site which responds to the requirements of a range of modern tenants / occupiers within the use class proposed whilst successfully responding to the context in which it sits. The site benefits from ease of access to the strategic road network and will provide employment opportunities to the local area. The proposals provide for employment uses in accordance with the principles for the area as set out in the adopted and emerging Plan.

4.0 PLANNING HISTORY

- 4.1 This section of the Planning Statement provides a brief summary of recent relevant planning decisions relating to the Site, as determined by WHBC as the local planning authority.
- 4.2 The previous planning history is summarised below, predominately relating to the former use of the Site as a gasholders site and its subsequent decommissioning and demolition. Most importantly, the Site has been cleared, decommissioned and the hazardous substances consent has been revoked, removing any restrictions on the use and occupation of the Site.

| Planning Application ref. | Description | Decision | Decision Date |
|----------------------------------|--|-----------------|----------------------|
| 6/2017/2354/PN14 | Prior approval for the demolition of 2 x gasholders and boiler house. | Approved | 16/11/17 |
| 6/2017/0605/HAZ | Revocation of Hazardous Substances Consent Order. | Approved | March 2017 |
| N6/2000/0752/HS | Application for continuation of Hazardous Substances Consent. | Approved | 24/07/00 |
| N6/1997/0510/FP | Use of the land and buildings for car sales and ancillary vehicle storage. | Approved | 01/08/1997 |
| N6/1979/0729/ | Extension to customer service reporting centre. | Approved | 12/11/1979 |
| E/1969/1490/ | Assembly building, stores and parking. | Approved | 13/08/1969 |
| E/1963/2376/ | Gas holder. | Approved | 10/02/1964 |
| E/1954/1332/ | Boiler house for gas holder. | Approved | 16/12/1954 |
| E/1950/0545/ | Gas holder. | Approved | 17/08/1950 |

- 4.3 In addition to the above, the southern-most portion of the Site is currently in use as part of the operations of the adjoining ATS Euromaster for informal parking and servicing. The use of the adjoining site was approved through application ref. C6/1988/1144/FP approved in 1988.

5.0 THE DEVELOPMENT PLAN

- 5.1 This section of the Planning Statement sets out the existing development plan policies relevant to the consideration of this planning application.
- 5.2 Section 38(6) of the Planning and Compulsory Purchase Act 2004 provides that planning decisions must be made in accordance with the development plan unless other material considerations indicate otherwise. This is reinforced at paragraph 2 of the NPPF which states:

“Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise.”

Adopted Development Plan

- 5.3 The current Development Plan for the District comprises the saved policies of the Welwyn Hatfield District Plan, adopted 2005 and saved 2007.
- 5.4 The Welwyn Hatfield District Plan (2005) is identified to provide the local planning framework, proposals and policies which will guide the development and use of land in the district over the following 10 years (i.e. up to 2015). The Plan is therefore progressively out-of-date.
- 5.5 Notwithstanding, the site forms part of a designated Employment Area EA1 (Welwyn Garden City Industrial Area) as part of Policy EMP1 – Employment Area. Policy EMP1 supports for the re-use of existing employment land and buildings for Class B uses. The Council will also give favourable consideration to proposals for the redevelopment of existing employment sites, in the designated Employment Areas, which would update and improve the quality of the employment stock in the district.
- 5.6 Policy EMP2 sets out the acceptable uses in designated employment areas. Proposals for development within Use Classes B1 (now Use Class E), B2 and B8 will be permitted subject to: the proposal not having an unacceptable impact on the demand for housing, the proposal would not have an unacceptable impact on the local transport infrastructure, the proposal would not harm the amenities of any nearby residential properties, the

development would provide adequate parking, and any retail element of the development would clearly be ancillary to the main business use.

- 5.7 Policy SD1 sustainable development sets out that 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.
- 5.8 Policy R1 sets out that 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 developed.
- 5.9 Policy R2 contaminated land encourages proposals for the development and reuse of land which is or may be contaminated. On such sites, applications must be accompanied by a full survey of the level of contamination and proposals for remediation measures. The Council will need to be satisfied that there will be no unacceptable risk to health or the environment arising from the remedial works or the proposed use of the site.
- 5.10 Policy R3 expects all development to include measures to maximise energy conservation through the design of buildings, site layout and provision of landscaping, and incorporate the best practical environment option for energy supply.
- 5.11 Policy R11 Biodiversity and Development requires all new development to demonstrate how it would contribute positively to the biodiversity of the site.
- 5.12 Policy R18 Air Quality ensures that the Council will have regard to the potential effects of a development on local air quality when determining applications. Consideration will be given to both the operational characteristics of the development and to the traffic generated by it.
- 5.13 Policy R19 sets out that the Council will refuse development if it is likely to generate unacceptable noise or vibration or to be affected by unacceptable noise or vibration from other land uses. Proposals should be in accordance with the Supplementary Design Guidance.
- 5.14 Policy M1 integrating transport and land use sets out that development proposals will be permitted only in locations with accessibility to pedestrian and cycle routes and passenger transport services. In considering proposals, the Council will give priority to walking and more sustainable modes of travel.

- 5.15 Policy D1 sets out that the Council will require the standard of design in all new development to be of a high quality. The design of new development should incorporate the design principles and policies in the Plan and the guidance in the supplementary design guidance.

Emerging Welwyn Hatfield Draft Local Plan (August 2016)

- 5.16 The new Local Plan (2013-2032) was submitted for examination on 15 May 2017. Stage 8 hearing sessions were held in July and August 2020 and the Inspector issued preliminary conclusions and advice to Welwyn Hatfield Council on 23 October 2020. This provided the Council with two options – to either propose additional housing sites sufficient to meet the Full Objectively Assessed Housing Need or to withdraw the Plan for examination. The Council are in the process of undertaking further work to meet this requirement. The Council aim to agree the main modifications for consultation with the Inspector by mid-October 2021 to be consulted upon between December to February before planned adoption in Spring/early Summer 2022. It should be noted, however, that the Inspector did not raise concerns over the employment related policies of the Plan, which are relevant to the determination of this application.
- 5.17 Draft Policy SP1 delivering sustainable development seeks to bring about sustainable development in the borough by: planning positively for growth in a way which supports economic growth, new development should contribute to the creation of mixed and sustainable communities, the location of new development should be sustainable, natural and heritage assets of the borough should be protected, and the adaptation and mitigation principles relating to climate change are incorporated into the design and construction of new development.
- 5.18 Draft Policy SP2 (Targets for Growth) notes that provision will be made for at least 116,400 sqm of new floorspace for industry, offices, and warehousing over the plan period from designated employment areas and mixed use sites including the strategic development sites.
- 5.19 The site is included as a continued allocation for employment use under draft Policy SADM10 – EA1 Welwyn Garden City Employment Area. In the designated employment areas, planning permission will be granted where development is for the use classes set out (B1 [now Class E], B2, and B8).
- 5.20 Draft Policy SP 9 (Place Making and High Quality Design) amongst other matters sets design criteria for taller buildings to positively address, including: clustering with other

existing or proposed taller buildings within the immediate and wider area; long distance views; impact on skyline, townscape, historic assets and landscape; shadowing; micro-climate and wind tunnelling; relationship and interaction with the street and human scale.

- 5.21 Draft Policy SADM12 (Parking, Servicing and Refuse) states that 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.
- 5.22 Draft policy SADM 13 (Sustainability requirements) directs that all non-residential development with a floorspace of 1,000 sqm or more will be required to meet at least BREEAM 'Excellent' unless it is demonstrated that it is technically not feasible or viable to do so, in which case such proposals will be required to demonstrate a 'Very Good' rating.
- 5.23 The Proposed Development is considered to meet the aims and objectives of the Council's industrial strategy including according with all relevant policies in the adopted and emerging Plan.

6.0 MATERIAL CONSIDERATIONS

6.1 This section provides a summary of material considerations that are relevant to the determination of this application.

National Planning Policy Framework

6.2 The revised National Planning Policy Framework (NPPF) (July 2021) sets out the Government's planning policies for England and explains how these should be applied to development proposals. Whilst the NPPF does not form part of the development plan, it is a material consideration in the determination of planning applications. Where a Development Plan is considered out of date, planning applications must be assessed against the merits of 'sustainable development' as defined in the NPPF.

6.3 The NPPF requires decisions to be led by the principles of sustainable development and requires proposals to meet the economic, social and environmental objectives as set out in paragraph 8. As paragraph 10 states, the presumption in favour of sustainable development lies at the heart of the Framework.

6.4 Paragraph 11 requires decision-taking to accord with an up-to-date Development Plan; or when there are no relevant development plan policies, or policies which are out-of-date permission should be granted unless it is contrary to the Framework or in granting permission it has a significant and demonstrable harm which outweigh the benefits when assessed against the Framework.

6.5 Chapter 4 outlines the decision-making process, including the level of weight given to emerging plans based on the stage of preparation, the extent of unresolved objections and the degree of consistency with the NPPF.

6.6 Chapter 6 outlines how the Framework encourages the creation of a strong, competitive economy. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.

6.7 Of particular relevance is paragraph 82 which states:

“Planning policies should:

- a) set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration;**
- b) set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;**
- c) seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and**
- d) be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.”**

6.8 Paragraph 83 states:

“Planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.”

6.9 Chapter 8 of the revised NPPF promotes healthy and safe communities which requires decisions to ensure that they achieve healthy, inclusive and safe places.

6.10 Chapter 9 sets out the requirement to promote sustainable transport. Paragraph 104 states the following:

“Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:

- a) the potential impacts of development on transport networks can be addressed;**
- b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;**
- c) opportunities to promote walking, cycling and public transport use are identified and pursued;**
- d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and**
- e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.”**

6.11 Paragraph 107 considers parking standards and requires policies and decision-making to consider a number of elements other than just the proposed use. This includes:

- Accessibility of the development;
- The type, mix and use of development;
- The availability of the opportunities and public transport;
- Local car ownership levels; and
- Ensure provision for ultra-low emission vehicles.

6.12 Paragraph 110 states that:

“In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

- a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;**
- b) safe and suitable access to the site can be achieved for all users;**
- c) the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code; and**
- d) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.”**

- 6.13 Paragraph 111 states that development should only be refused on highways grounds if there is an unacceptable risk to highways safety, or a cumulative impact would be severe.
- 6.14 Chapter 11 relates to making effective use of land and requires decisions to promote an effective use of land in order to meet the needs for homes, industry and other uses, while safeguarding and improving the environment. Paragraph 121 requires Local Planning Authorities to take a proactive role in identifying and helping to bring forward land that may be suitable for meeting development needs. Furthermore, paragraph 124 states that decisions should support development that makes efficient use of land, taking into account the need for development and the availability of land suitable for accommodating it, local market conditions and viability, and the availability and capacity of infrastructure and services.
- 6.15 Chapter 12 focuses on achieving well-designed places which is fundamental to what the planning and development process should achieve. There is also a theme throughout the chapter which emphasises the importance of early discussions between the applicant and council. Paragraph 130 sets out what good design is considered to be for decision-taking

and includes: adding to the overall quality of the area, being visually attractive and optimising the potential of the site to accommodate and sustain an appropriate amount and mix of development.

- 6.16 Chapter 14 outlines the requirement for plan-making and decision-taking to meet the challenges presented by climate change, flooding and coastal change. This outlines the requirements of the planning system to support a transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change.
- 6.17 Conserving and enhancing the natural environment is covered in chapter 15 of the NPPF. This includes protecting valuable landscapes, biodiversity and preventing new and unacceptable risk from pollution.
- 6.18 Chapter 16 provides guidance on the conservation and enhancement of the historic environment, including advising (at para 202) that where development leads to a less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal.

Other Government Guidance

- 6.19 In addition to the NPPF, the Government publishes Planning Practice Guidance (PPG) to provide additional guidance on specific topics.
- 6.20 PPG on *Determining a Planning Application* (June 2021) sets out the process and expectations for decision-making, including factors that can be taken into account as material considerations. PPG sets out the approach to the consideration of material considerations in the determination of applications, including the planning history of a site.
- 6.21 Alongside PPG on *Design: process and tools* (October 2019), the *National Design Guide* expands the design objectives outlined in the NPPF and sets out the characteristics of good design. While the document primarily focused on design in relation to residential and mixed-use development, it does consider the importance of matters such as connectivity and sustainability of developments which is relevant to this application.

Relevant Supplementary Planning Documents (SPDs)

- 6.22 Welwyn Hatfield Council's Design Guide was adopted in February 2005 providing further guidance on the design and layout of new developments in the District, supplementing policies in the District Plan (2005).
- 6.23 The Council's Interim Policy for Car Parking Standards and Garage Sizes (2014) confirms that the previous maximum parking standards contained within the District Plan 2005 and Parking Standards Supplementary Planning Guidance (2004) are to now be treated as guidelines rather than maximums. Standards will be considered on a case-by-case basis, taking account of relevant circumstances of the proposal, its size, context and wider surroundings.

7.0 ASSESSMENT OF APPLICATION PROPOSALS

7.1 This section of the Planning Statement provides an assessment of the Proposed Development, taking account of development plan policies, material considerations and the Site's planning history, set out in previous sections. This section also includes an overview of the relevant technical documents submitted for consideration as part of the application.

Principle of Development for Employment Purposes

7.2 The Site comprises predominately land which is unoccupied and previously developed (for Gasholders), with the exception of land to the southwest and south of the Site in use for a car dealership and as part of ATS Euromaster. Policy R1 of the adopted Local Plan seeks to make best use of previously developed land and Policy R2 supports re-use of contaminated land. These policies are entirely consistent with the NPPF which seeks to make the best possible use of previously developed brownfield land.

7.3 The Site is designated as an employment area within EA1 Welwyn Garden City Industrial Area (Policy EMP1) and within the emerging Local Plan (draft Policy SADM10). The Site therefore benefits from support of the adopted and emerging Plan for redevelopment for employment purposes, with the emerging Plan specifically identifying it to be appropriate for B1 [now Class E], B2, and B8 uses, as proposed.

7.4 Accordingly, the principle of redeveloping the site for beneficial use, and the proposed form of commercial development (Class E(g)(iii) – formerly B1(c); B2 and B8, is considered to be accepted.

7.5 The provision of 6,394sqm (GIA) of floorspace will create between 94 and 239 new full-time equivalent employment opportunities, as set out in the Economic Benefits Assessment, and support circa. 5.5% of the Borough's 'new additional' employment floorspace as required by the emerging Local Plan (draft policy SP2).

Scale and Design of Development

7.6 The Design and Access Statement (DAS) prepared by Jefferson Sheard Architects provides a comprehensive assessment of the design principles and access arrangements for the Proposed Development, detailing how it represents an appropriate response to the Site

context, addressing the key issues of use, amount, layout, scale, appearance, landscaping and access.

- 7.7 The proposed layout comprises of a terraced unit arrangement, sited along the western boundary. 3no. units are proposed with warehouse space at ground floor and smaller ancillary office space at first floor.
- 7.8 The size of the units and the provision of ancillary office spaces makes the units more attractive to small and medium sized businesses (SME's) looking for new space to grow into, which is likely to be particularly attractive to local businesses, protecting and growing employment opportunities. The provision of mezzanine office space allows for on-site management, data and technological jobs associated with the business to be provided on site, supporting a wider range of roles available to the local community rather the solely jobs associated with logistics and manufacturing.

| | Ground Floor Warehouse GIA (sqm) | First Floor Office & Ancillary GIA (sqm) | Total Floorspace GIA (sqm)* | Total Floorspace GEA (sqm) |
|---------------|---|---|------------------------------------|-----------------------------------|
| Unit 1 | 3,212 | 382 | 3,594 | 3,705 |
| Unit 2 | 1,047 | 149 | 1,196 | 1,245 |
| Unit 3 | 1,420 | 185 | 1,604 | 1,670 |
| Total | 5,679 | 716 | 6,394 | 6,620 |

** totals may not add due to rounding*

- 7.9 The units have been designed based on potential occupier requirements, including proposed haunch heights, which allows for racking of space internally, a specific requirement for modern storage and distribution companies. A difference in height is proposed across the units to assist in breaking up the overall mass of the terrace. To create further interest across the elevations cladding features are proposed near the entrance to units to assist with wayfinding and legibility.

| | Haunch Height (m) | Maximum Height (m) |
|---------------|--------------------------|---------------------------|
| Unit 1 | 10 | 13.5 |
| Unit 2 | 10 | 13.5 |
| Unit 3 | 12 | 15 |

- 7.10 Design approach to the development's appearance includes use of high quality, contemporary materials that are durable and suitable for the intended use. A limited palette of materials and colours are proposed to provide a calm and simple aesthetic to the building frontages, alongside glazing provided to the office elements to allow visibility of internal activity and to add visual interest to the external facades.
- 7.11 The DAS provides further detail on the proposed materials alongside aerial and building views which confirm the suitability of the proposals within the context in which it sits.

Transport, Accessibility and Parking

- 7.12 The application is supported by a Transport Assessment, prepared by Pulsar Transport Planning, the scope of which has been agreed through pre-application advice from Hertfordshire County Council Highways. The Transport Assessment summarises all transport-related matters relating to the application including access and parking provision. This assesses the impact of the change on the local highway network and public transport services in the vicinity of the Site relative to the overall development site traffic generation agreed under the outline planning permissions.
- 7.13 As detailed in Section 3 of this Planning Statement, the development includes provision for parking (including accessible spaces and electric vehicle charging facilities), servicing and cycling sufficient for the proposed use. The quantum of parking proposed is supported by a pre-application response from Hertfordshire County Council Highways.
- 7.14 The Transport Assessment confirms a relatively small increase in traffic generation will occur following the implementation of the proposed development, of approximately 48 two-way net additional vehicle trips between 8am – 9am and 49 two-way net additional vehicle trips between 5pm – 6pm. The proposals are therefore not expected to have a detrimental impact on the local highway network.
- 7.15 Given the negligible increase in traffic identified, it is considered there will be no significant impact arising from the proposed development upon Air Quality.
- 7.16 A Workplace Travel Plan has also been prepared which provides a long-term management strategy for the proposed development which seeks to deliver sustainable transport improvements. The measures recommended within Travel Plan set to encourage future users of the site to make informed decisions about travel, through seeking to eliminate barriers from sustainable modes of transport.

Flood Risk and Drainage

- 7.17 A Site-Specific Flood Risk Assessment (FRA) has been prepared by BWB which confirms that the Site is in Flood Zone 1 and is therefore not at risk from river or sea flooding and is not at risk from any other sources of flooding.
- 7.18 The FRA demonstrates that the proposed development is not at significant flood risk, subject to recommended flood mitigation strategies proposed, namely profiling of ground levels to encourage pluvial runoff and overland flows away from built development and implementation of surface water attenuation and storage.
- 7.19 A separate Sustainable Drainage Strategy has been prepared which details the proposed surface water attenuation and storage arrangements, comprised of an attenuation tank located at the lowest area of the Site, between the development and outfall location. The drainage proposals are identified to provide a minimum of 50% betterment upon existing rates (1 in 1yr) increasing to >80% betterment during a 1 in 100yr plus 40% climate change scenario.

Ecology and Landscape

- 7.20 An Ecology Survey Report has been undertaken by Royal Haskoning DHV, including the results of an extended Phase 1 habitat survey. The report confirms the habitats present within the Site are typical of the urban area and all considered to be of negligible ecological value. Where potential impacts are identified, i.e. removal of trees and areas of tall ruderals, mitigation is identified.
- 7.21 A Landscape Detail Plan (Drawing No. 01203 P1) supports the application which has been developed in close consultation with the project ecologist to enable a scheme of hard and soft landscaping which incorporates species to maximise opportunities for ecological enhancement, alongside the provision of bird boxes, and new tree planting.
- 7.22 The application is also supported by an Arboricultural Implications Assessment prepared by Andrew Belson Arboricultural Consultant which reviews tree implications of the proposed development. As detailed in the report, the works would result in the loss of several tree, however, the quality and condition of most of these means their value is rescripted to site level.
- 7.23 The linear trees along the eastern boundary, within the highway verge, are predominately retained, providing a desirable landscape feature. A single tree among these is identified

for removal to facilitate the provision of the southern access. A replacement tree is to be planted to maintain this linear group.

Noise

7.24 An assessment of potential noise impacts arising from the proposed development has been undertaken as detailed in the accompanying Noise Assessment prepared by BWB. This includes an on-site baseline noise survey undertaken in September 2021 to measure existing background noise levels.

7.25 The existing noise environment surrounding the Site is dominated by road traffic noise and movements at nearby existing industrial units. The results of the work undertaken demonstrate that operations associated with the proposed development are likely to result in a low impact on nearby sensitive receptors, similar to the existing noise environment. As such, noise related impacts are considered acceptable.

Lighting

7.26 The application includes a detailed lighting scheme for the external areas of the Site, as set out in the lighting layout drawing (drawing no. 2401 Rev P03) prepared by Anderson Green. The scheme has been carefully prepared to ensure that significant light spillage beyond the Site does not occur and amenity and ecological interests are protected.

Sustainability and Energy

7.27 The application is accompanied by a Part L and EPC Report produced by Anderson Green which identifies the key features of the proposals that contribute to achieving a low carbon development and demonstrates it achieves Building Regulations Part L2A requirements and planning policy compliance through a 38.3 – 41.7% (per unit) reduction in carbon emissions against the target emission rate (above the 10% reduction requirement).

7.28 The proposed energy strategy includes the integration of renewable technologies through the use of photovoltaic (PV) panels at roof level. The potential areas for these are identified on the Roof GA Plan (Drawing no. 02203 P4).

7.29 A Preliminary BREEAM Report has also been prepared by Anderson Green, who has pre-assessed the development against BREEAM 2018 New Construction Methodology. The document therefore sets out the anticipated credit score for the scheme, based on a range

of technical details at the design stage, confirming the proposed development will achieve BREEAM 'Excellent' certification.

Ground Conditions

- 7.30 The application is supported by a Phase 1 and Phase 2 Geo-Environmental Assessment prepared by BWB to fully understand any below ground environmental / contamination risks to the development, based upon the former uses of the Site (as a gasholder) or through any pollutant pathways from surrounding / nearby uses.
- 7.31 As detailed in the reports, the Site is comprised of Made Ground deposits over superficial deposits of the Kesgrave Catchment Subgroup (sand and gravel). Marginally elevated carbon dioxide concentrations were recorded at one location near the centre and elevations levels of methane to the north-east corner. Other potential risks, including asbestos fibres, have also been identified.
- 7.32 The reports conclude that further work be undertaken to assess the elevated methane concentrations, alongside contingences being put in place for any further contamination issues, if identified. A Remediation Strategy is proposed, to be secured by way of condition, to be completed prior to development to provide remediation, mitigation and verification requirements.

Heritage

- 7.33 A Heritage Statement has been prepared by BWB which considers any potential impacts of the proposed development on both built heritage assets and below ground archaeology.
- 7.34 Despite archaeological evidence within the study area, particularly that dating to the Iron Age and Romano-British period, the construction of gas holders, fuel tanks and associated structures from the 1930s on the Site means that any sub-surface archaeological remains would likely have been truncated. Therefore, no further archaeological work is recommended.
- 7.35 In respect of built heritage, whilst there are 6no. listed buildings within 1km of the Site, the majority share no inter-visibility with the Site due to distance and intervening built form. Due to its height, development has the potential to impact upon the Grade II listed Nabisco Shredded Wheat Factory which is visible to the southwest. The historic setting of this listed building would have been industrial, containing other factories and industrial buildings, and the construction of commercial units on the Site, which is surrounded by

other warehouses and units of a similar scale, will not substantially undermine the asset's setting. As such, the predicted level of harm arising from the proposed development to the significance, within setting, of the factory is considered to be at the lower end of less than substantial.

8.0 PLANNING BALANCE AND CONCLUSIONS

- 8.1 This Planning Statement has been prepared by Barton Willmore LLP in support of an application for full planning by Henry Boot Developments for the development of the former gasholders site at Tewin Road (the 'Site') for E(g)(iii), B2 and B8 uses.
- 8.2 The Proposed Development is on an underutilised, previously developed brownfield site, within a defined Employment Area, and is consistent with the adopted and emerging Local Plan allocation for the Site. The Site therefore benefits from support from the NPPF and the Development Plan for its redevelopment.
- 8.3 As detailed in the Economic Benefits Statement prepared by Barton Willmore, the Proposed Development will support economic growth and job creation in Central Bedfordshire supporting local businesses who may seek to move to new, modern premises, generating between 41 and 104 direct jobs and 53 to 153 indirect jobs, alongside additional jobs during construction. In total, the proposal is estimated to generate £14.1m in economic output (GVA) over the construction period and between £4.2m to £17.m GVA per annum during operation.
- 8.4 The design responds to the current market requirements, creating a range of employment opportunities and space for new and existing Small and Medium sized local businesses, whilst having consideration for its location and setting. The Design and Access Statement provides a comprehensive overview of the proposals including how it represents an appropriate response to the Site context, including in respect of use, amount, layout, scale, appearance, landscaping and access.
- 8.5 Comprehensive assessments have been undertaken in respect of a range of technical matters, to ensure that the Proposed Development complies with relevant standards and will not have a significant impact on human health and sensitive receptors. The various reports submitted in support of the application demonstrate that the proposals are acceptable with regards to key issues such as drainage, transport, noise, energy and sustainability, and heritage. Accordingly, there are no material considerations that would justify the Proposed Development not being approved in accordance with the development plan under Section 38(6).
- 8.6 The Heritage Statement has identified a predicted level of harm arising from the proposed development to the significance, within setting, of the Grade II listed Nabisco Shredded Wheat Factory, albeit this is considered to be at the lower end of less than substantial. In

accordance with para 202 of the NPPF, where development will lead to a less than substantial harm this harm should be weighed against the public benefits of the proposal. In this instance, the public benefits, notably the significant economic benefits highlighted above alongside environmental and social benefits, such as biodiversity enhancement, surface water drainage betterment and redevelopment of a brownfield site to support employment opportunities in accordance with the Development Plan, are considered to demonstrably outweigh the less than substantial harm identified.

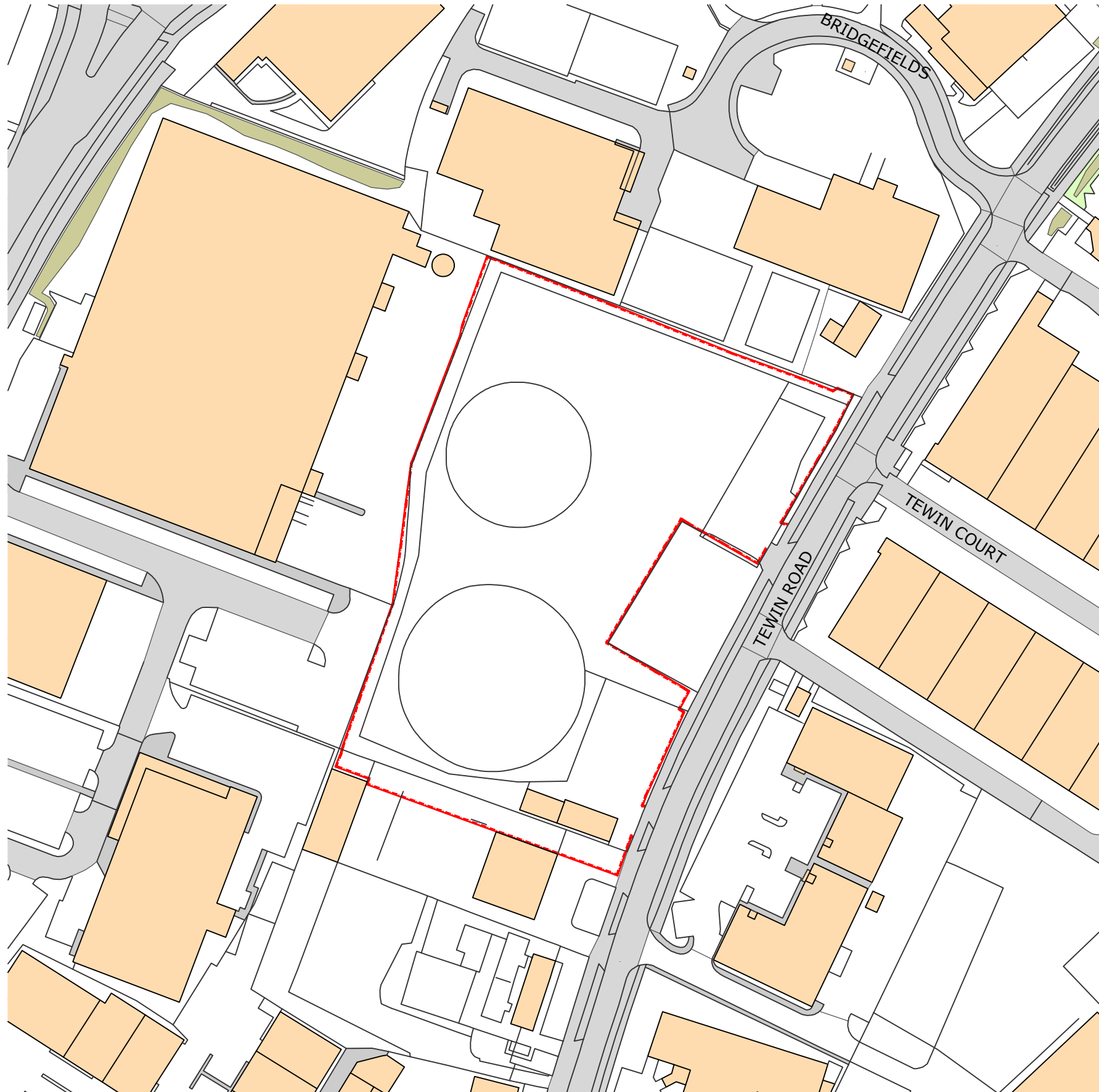
- 8.7 The Proposed Development is therefore considered in accordance with relevant national and local planning policy. It is regarded as sustainable development, for which we consider planning permission should be granted.

APPENDIX 1

Site Location Plan



VISUAL SCALE 1:1250 @ A3



Do not scale from this drawing
 The contractor is to check all dimensions on site and report any discrepancies to the architect
 All rights described in chapter IV of the copyright, designs and patents act 1988 have been generally asserted

Notes

SITE ADDRESS
 Tewin Rd,
 Welwyn Garden City
 AL7, UK

LEGEND
 ■ ■ ■ APPLICATION BOUNDARY

| P2 | Planning Submission | 27/08/21 | CC | JD |
|-----|---------------------|----------|----|-----|
| P1 | Initial Issue | 20/08/21 | CC | JD |
| Rev | Description | Date | By | Chk |

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Project
 Tewin Road
 Welwyn Garden City

Drawing
 Site Location Plan

| | | |
|--|--------------|----------------|
| Scale 1:250 | Drawn JSA | Date AUG 21 |
| Drawing Purpose PLANNING SUBMISSION | | Status S5 |
| Ref. 1734-JSA-WY-XX-DR-A-01001 | Rev. P2 | |

A3

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