
Planning Statement

Demolition of existing office building (B1 use) and structures, and the construction of seven apartment buildings comprising 576 dwellings (C3 use) together with internal roads, parking, public open space, landscaping, drainage and associated infrastructure

Land west of Lytton Way, Stevenage

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Appendices

Appendix 1 EIA Screening Response from Stevenage Borough Council

1. Introduction

- 1.1. Savills (UK) Ltd have been instructed by Hill Residential Ltd to submit a full planning application for the redevelopment of land to the west of Lytton Way, Stevenage. The proposal involve the redevelopment of a large vacant office building.
- 1.2. This Planning Statement has been prepared to support the planning application for the following development
- “Demolition of existing office building (B1 use) and structures, and the construction seven apartment buildings comprising 576 dwellings (C3 use) together with internal roads, parking public open space, landscaping, drainage and associated infrastructure”.*
- 1.3. The submission of this full planning application to Stevenage Borough Council follows extensive pre-application discussions between the Applicant’s project team and senior Council Officers. The submitted scheme has evolved during these discussions. The iterative process of design and layout is expressed within the submitted Design and Access Statement.
- 1.4. The submission of the application constitutes a major application and comprises the following components
- Completed forms and certificates
 - Existing and Proposed Plans
 - Demolition Strategy Statement
 - Planning Statement
 - Site Marketing Report
 - Design and Access Statement
 - Ecological Appraisal Report
 - Biodiversity Net Gain Assessment
 - Day and Sunlight
 - Flood Risk Assessment and Drainage Strategy
 - Utilities Report
 - Built Heritage Statement
 - Desk Based Ground Conditions Report
 - Phase 1 Site Investigation Report
 - Landscape Strategy
 - Noise Impact Assessment
 - Energy Statement
 - Transport Assessment
 - Travel Plan
 - Arboricultural Impact Assessment
 - Air Quality Report

2. Description of Site and Surroundings

- 2.1. The application site is some 2.75 hectares in extent and lies in a transitional zone on the north-western edge of the Town Centre and to the south of the Old Town, beyond the Conservation Area. The site is located beyond the Town Centre Conservation Area. The site is bordered on its western edge by the 'East Coast Main Line' railway line with Stevenage train station located within a 10 minute walk to the south of the site. The train station provides key connections to surrounding towns and cities including Kings Cross station which is a 25 minute train journey with trains leaving every 10 minutes during peak times.
- 2.2. The eastern edge of the site is framed by Lytton Way (A602), a major route running north-south to the west of the Town Centre. The site benefits from an existing access onto Lytton Way. The site is well placed in its connection to the existing road network which provides easy links at a regional level to London, Peterborough and Cambridge via the A1 (M1). The northern part of Stevenage is accessed using Junction 8 of the A1(M) and the south of the town is accessed using Junction 7.
- 2.3. The northern edge of the application site is formed by the Trinity Road arm of a major 4 arm roundabout. The southern edge is formed by the Fairlands Way arm of another major 4-arm roundabout.
- 2.4. Within the site itself, site coverage is the form of a large 7-8 storey commercial office building (B1 use), constructed in an S-form set within a well landscaped edge up to the railway and the three bordering roads. The office building dates from 1989 and comprises 11,316 sqm. It was most recently occupied by Betfair and TalkTalk and is reported to have been vacant for a number of years. The building footprint is angled across the site with large glazing elevations which step in as the building rises. The building features a large ground floor reception and full height atrium area. Undercroft parking exists as well as additional open parking areas interspersed with small maintained green spaces set within a well-managed landscaped edge.
- 2.5. The office building has been in use as an office for a number of years. The site is not allocated for any specific use in the recently adopted Stevenage Borough Local Plan. It is therefore classed as a 'windfall site' where specific policies will apply in the context where existing unallocated employment sites are being considered for alternative use. This is set out in more detail with section 4 of this Planning Statement.
- 2.6. The site is largely flat although embankments on the eastern edge of the site slope gently down towards Lytton whilst sloping upwards steeply towards the rail line on the western side. A network of pedestrian and cycle routes run along the eastern edge of the site and provide important linkages to the railway station, the town centre and other areas of central Stevenage. The nearest bus stops are located on Chequers Bridge Road (northbound), the A1155 Fairlands Way/ Argyle Way (westbound); and Gunnels Wood Road (eastbound).
- 2.7. The eastern edge of the application site is formed by the embankment which is vegetated by mature trees and shrubs. The accompanying Tree Survey identifies the location of existing trees and has classified their quality and confirms that none of the trees at the site are subject to any statutory protection.

- 2.8. The accompanying Ecological Appraisal identifies that the site is situated within 1.3km of Knebworth Woods Site of Special Scientific Interest and within 880m of Six Hills Common Local Wildlife Site. It is noted that the site contains a mix of habitats which have been judged to be of limited ecological value. The Ecological Appraisal confirms that no protected or priority species were found at the site.
- 2.9. The supporting Flood Risk Assessment (FRA) identifies that the site is situated within Flood Zone 1, the lowest risk of fluvial flooding. The FRA explains that the government's mapping identifies a small portion of the site, to the west, to be at high risk of surface water flooding.
- 2.10. Consideration has been given to the ground conditions at the site. It has been identified by Geosphere Environmental Ltd that in general the risk of contamination is low, with some contaminants being considered to be present as hot-spots.
- 2.11. The loss of permanent employment floorspace on the site will occur if the development proposals within this application are approved. From a functional perspective, we are aware that the existing office floorplates, cores and service areas are not appropriate to modern needs. Accordingly, the Applicant is making the case that this office building should be demolished in circumstances where no realistic commercial interest has been expressed as a result of marketing and consequently there remains a significant opportunity to secure new modern residential development on this sustainable site in central Stevenage. These matters are assessed later within this Statement.
- 2.12. The site is clearly in a central location within Stevenage which is highly sustainable in respect of the excellent access to surrounding services and amenities. Whilst the site has simple connections into the road network, a series of paths and cycleways around the site enables connections into the wider system and thus the ability to understand pedestrian and cycle movements in this central part of the town. The presence of both the train station and bus station, the proximity of the town centre and all its attendant shops and services together with major supermarkets nearby, all serve to highlight the site's sustainability credentials.
- 2.13. The redevelopment of this windfall site for major residential development provides the opportunity to secure much needed investment into central areas of the town and contribute to the regeneration and transformation of central Stevenage.

3. Development Proposals

- 3.1. The Applicant, Hill Residential Ltd, seeks full planning permission for the “*Demolition of existing office building (B1 use) and structures, and the construction seven apartment buildings comprising 576 dwellings (C3 use) together with internal roads, parking public open space, landscaping, drainage and associated infrastructure*” at land to the west of Lytton Road, Stevenage. The development comprises 260 homes for market sale, 264 Build to Rent apartments, and 52 affordable rented homes.
- 3.2. The development proposals for the site have evolved from an understanding of the policy context and a detailed assessment of the site and its surroundings. Such matters are set out in detail within the submitted Design and Access Statement which in turn has evolved from initial concepts and designs to much more advanced work having had the benefit of ongoing pre-application discussions with senior officers of the Council.
- 3.3. From the outset, there has been a recognition and an acknowledgement that the existing office building is prominent in the urban landscape as it can be seen from many locations in the area including the pedestrian footbridge over the A1155 and the existing access roads including the railway line around the edge of the site.

Demolition

- 3.4. This application proposes the demolition of the Office Building and existing structures as identified on submitted plans.
- 3.5. The application is supported by a proposed Demolition Strategy which explains that all demolition activity will be completed in accordance with British Standard 6187:2011 ‘Code of Practice for Full and Partial Demolition’. It also contains measures to seek to minimise the dispersion of dust, to limit disturbance caused by vibrating machinery, and to protect existing trees. The report also includes procedures to safely remove asbestos in the event it is found within the existing structure of the buildings. Given the proximity to the rail line, the report includes specific measures to respond to this feature.

New Residential Development

- 3.6. As referred to earlier the site lies within a transitional zone, outside of the commercial Town Centre and adjacent to residential areas to the west and east. An assessment of building heights in the immediate area and contained within the Design and Access Statement provide an urban context for scale and massing. Coupled with the zoning of land uses in the immediate area, the analysis has assisted in the consideration of the various site constraints and opportunities which then allowed a series of design options to come forward based on building block options for residential development.
- 3.7. The approach is based upon securing key features within the design approach to include the following:
- Securing high quality amenity areas in the centre of the site;
 - An array of buildings with minimal footprint to enable dual aspect;

- To have a central access route to create activity which provide easily accessible servicing arrangements; and
 - Graduation of heights across the site to emphasise elements at northern and southern ends.
- 3.8. The proposed site layout is characterised by the retention of the existing vehicle access onto Lytton Way which then enters the central part of the site, into a central plaza area upon arrival. The route then splits to each end of the site, off which external parking areas are proposed.
- 3.9. A series of 7 apartment buildings are positioned within the site with six of these fronting Lytton Way and the two roundabout arms. The seventh building is to be set back into the site and provides the visual entrance point upon arrival.
- 3.10. The building heights and the positioning of the blocks are set out in the submitted plans and in the Design and Access Statement. The tallest buildings, 16 storeys, are to be positioned to the north and south of the site acting as book ends to the site. These blocks acts as a visual way finder given its location in a prominent position within the surrounding environment. The buildings located in the middle vary in height, 9, 11 and 13 storeys, but the pattern of height is mirrored within the northern and southern sections of the site. The central buildings are 13 storeys and are situated in such a way to create a visual entrance to the seventh building to the west of the site.
- 3.11. These development proposals have been generated through a detailed process of site and contextual analysis. Building heights do vary in the local area and as such, it is worth noting that the closest residential block to the site (Kilby Road) is 10 storeys high and is located on the other side of the railway line. A 7 storey block at Woolners Way to the north of the site reflects a willingness to accept an approach which looks at providing much needed residential accommodation in central areas through increase building heights – this is further expressed those taller buildings within the Town Centre. Whilst the site sits on the north western corner of the Fairlands Way roundabout and thus not as part of the Town Centre, its proximity to such uses, the presence of tall buildings in close vicinity and the general sustainable nature of this site, all points to making sure that this site is fully assessed and is maximised in terms of provided a real opportunity to secure high quality new properties in a central location.
- 3.12. A total of 576 dwellings are proposed within the 7 blocks. The typical floor plans are designed around two principal block typologies – type A and type B. Block typology A splits at high level creating a tall slender element that rises above the lower blocks. Each building consists of 1, 2 and 3 bedroom apartments with studios located in Block 3 and Block 4.
- 3.13. Regarding the mix of dwelling type coming forward, the proposals include a variety of sizes ranging from studios to 3 bedroom apartments. The scheme will exceed with the requirements of Policy HO11 ‘Accessible and adaptable housing’ as more than 50% of apartments have been designed to comply with Building Regulation M4 (2) standard.
- 3.14. The proposed house types and sizes respond to the needs of the Borough in accordance with Policy HO9 ‘Housing Mix and Sizes’. In addition the proposals accord with nationally described space standards as required by Policy GD1 ‘High Quality Design’.

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- 3.15. The Studio apartments are approximately 38 sqm and are generally single aspect.
- 3.16. The 1 bed properties are approximately 50 sqm and are generally single aspect with open plan kitchen/living/diners.
- 3.17. The 2 bed properties are approximately 70 sqm and are generally dual aspect with kitchen/living/diners achieving views cross two directions.
- 3.18. The 3 bed properties are approximately 86 sqm and are dual aspect and offer a main bedroom. Open plans kitchen/living/diners have direct access to private balconies.

Proposed Housing Mix

	Studio	1 Bedroom	2 Bedroom	3 Bedroom	Total
Market for sale	0	97	143	20	260
Build to Rent	20	126	98	20	264
Affordable Rent	0	26	16	10	52
Total Apartments	20	249	257	50	576

- 3.19. Local Plan Policy HO7 seeks the delivery of 25% affordable housing at previously developed sites. The policy states that consideration will be given to reduced provision of affordable housing where it is robustly demonstrated with supporting viability statement. In accordance with Policy H08 the affordable dwellings are physically indistinguishable with other housing proposed.
- 3.20. In respect of materials, the apartment buildings will be constructed in brick. It is proposed there will be two key colours of grey and buff brick as identified within the submitted plans and Design and Access Statement.
- 3.21. The window positions have been designed to provide symmetry and add interest to the apartment buildings. There are two balcony treatments of plain glass and a perforated metal screen used interchangeably at each storey of the buildings to add variety and interest to the buildings. As described within the submitted Design and Access Statement, the pattern to be used on the metal screens is inspired by the local 'pasque wildflower'.

- 3.22. Each of the buildings are set within open amenity areas which have been the focus for detailed landscaping proposals whereby the strategy is to retain the existing mature trees and grassed banking areas. Between the buildings there is a mixture of pocket green spaces and paved areas to provide a high quality living environment in this new residential environment. The proposals incorporate 900sqm of onsite play provision as identified in the submitted Landscape Strategy and Landscape Masterplan.
- 3.23. Provision is made on the basis of approximately 0.5 car parking spaces per dwelling. A total of 274 car parking spaces:
- External parking bays – 180 car parking spaces
 - Disabled person parking bays – 15 spaces
 - Undercroft parking bays – 79 spaces
- 3.24. Disabled person parking bays are distributed throughout the scheme as identified within the submitted Design and Access Statement. The amount of total car parking spaces for the number and type of dwellings reflect the availability of public transport links, pedestrian and cycle connections and nearby services and amenities.
- 3.25. Regarding cycle parking a total of 576 cycle parking spaces are proposed within the scheme, all of which are contained within each block in designated cycle stores. The stores contain a double stacking system to accommodate a ratio of 1:1 bicycle per dwelling.
- 3.26. The cycle provision is distributed in the following manner
- Block 1 – 102 cycle spaces
 - Block 2 – 58 cycle spaces
 - Block 3 – 100 cycle spaces
 - Block 4 – 98 cycle spaces
 - Block 5 - 66 cycle spaces
 - Block 6 – 100 cycle spaces
 - Block 7 - 52 cycle spaces
 - Total – 576 cycle spaces

4. Planning Policy Context

4.1. Section 38 (6) of the Planning and Compulsory Purchase Act 2004, requires planning applications to be determined in accordance with the statutory development plan unless material considerations indicate otherwise. For Stevenage, the statutory development plan comprises:

- Hertfordshire Waste Development Framework (adopted 2012) and Hertfordshire Waste Site Allocations Development Plan Document (adopted 2014);
- Hertfordshire Minerals Local Plan 2002 – 2016 (adopted 2007); and
- Stevenage Borough Council Local Plan 2011-2031 (adopted 2019).

4.2. The Borough Council also relies upon a series of supplementary planning documents which include: Parking Provision SPD (January 2012) and Stevenage Design Guide SPD (October 2009).

Stevenage Borough Local Plan 2011-2031

4.3. The section of the Planning Statement identifies the policies and proposals within the adopted Local Plan which are considered relevant to the submitted application. Assessment of this policy context having regard to the development proposals is set out within the planning assessment section of this Planning Statement.

4.4. **Policy SP1:** Presumption in favour of sustainable development confirms that the Council will take a positive approach when considering development proposals.

4.5. Confirming that the local planning authority will follow sustainable principles when determining planning applications, **Policy SP2** contains the set of guiding principles for all new development in the Borough and consequently it is an important policy and hence it is set out in full below.

“We will work within the principles of sustainable development and reduce the impact of development on climate change. We will support the New Town ideal of a balanced community.

Planning permission will be granted where proposals demonstrate (as applicable), how they will:

- a. Deliver homes or jobs that make a positive contribution towards the targets in this plan;
- b. Supply a mix of uses, make good use of land and maximise opportunities for brownfield redevelopment within the town;
- c. Regenerate areas of the town that are under-performing;
- d. Reduce deprivation, improve quality of life and make sure that residents share in the benefits of regeneration and growth;
- e. Raise the aspirations, earnings, education level or life expectancy of residents;
- f. Provide a mix of homes and jobs for all sectors of the community;
- g. Promote journeys by bus, train, bike and foot and reduce the need to travel;
- h. Work within the limits of infrastructure and increase capacity where this is necessary to support development;

- i. **Make high-quality buildings and spaces that respect and improve their surroundings, reduce crime and the fear of crime;**
 - j. **Support facilities and services that encourage people to live, work and spend leisure time in Stevenage;**
 - k. **Produce places and spaces that enable people to live a healthy lifestyle;**
 - l. **Take a proactive approach towards energy use, including renewable energy and energy efficiency measures where practicable and appropriate;**
 - m. **Avoid or prevent harm from flood risk, contamination and pollution;**
 - n. **Protect and improve important open spaces, wildlife sites and habitats;**
 - o. **Preserve or enhance areas and buildings of historical and archaeological interest; and**
 - p. **Increase community awareness and involvement so that residents are involved in, and proud of, their town.**
- 4.6. Supporting paragraph 5.5 states that all applications for development should achieve as many of the aims contained within the above Policy SP2 as is practicable.
- 4.7. In the context of commentary ensuring that Stevenage seeks to deliver a strong, competitive economy, paragraph 5.17 acknowledges that there is a need to make better use of existing land in and around the Town Centre. Whilst an inherent part of the Plan's employment strategy, this also accords with the Government's planning guidance in the NPPF which directs intensive, trip generating uses to the most accessible locations. Paragraph 5.17 also goes on to state that the demand for office space within Central Stevenage is currently weak as a result of the poor image of the town centre and the lack of suitable premises. On the basis of the Council's own evidence demonstrating that much of the office stock within the Town Centre was not fit for modern business, it has been the case that a large number of office blocks in and around the Town Centre have secured 'prior approval' and are delivering much needed residential units. Clearly, the submitted development proposals on the site are an extension of the change from employment uses to residential uses.
- 4.8. **Policy SP5:** Infrastructure confirms that new development will be required to contribute fairly towards the demands it creates and consequently the Council confirm that they will use developer contributions, legal agreements, levies or other mechanisms to ensure that reasonable onsite provision, off site provision or contributions towards certain elements are provided e.g. affordable housing, cycling and walking, education and open spaces.
- 4.9. **Policy SP6:** Sustainable Transport supports provision of new transport facilities in and around the Town Centre whilst ensuring that high density residential uses which generate demand for travel are directed towards the most accessible locations. Assessments of development proposals will be considered against the relevant car and cycle parking standards and in accordance with Policy SP5, contributions will be sought to ensure the necessary accessibility issues are addressed in the context of transport.

- 4.10. **Policy SP7:** High Quality Homes identifies the need for “at least” 7,600 new homes within Stevenage Borough between 2011 and 2031. The policy states that at least 60% of such new homes should be on previously developed land. The policy confirms that the Council will also support applications for housing development on unallocated sites where they are in suitable locations and will not exceed their environmental capacity. In seeking to meet such a target over the plan period, there is acknowledgement that the Local Plan sets out an ambitious development strategy for the Borough and in such a context acknowledges at paragraph 5.73 that the priority sites for development are in the following order:
- Previously developed sites;
 - Green field sites within the existing urban area;
 - Green field sites outside the existing urban area;
 - Green Belt sites.
- 4.11. In the context of bringing new sites forward, **Policy SP8:** Good Design provides policy context for new applications and states:
- We will require new development to achieve the highest standards of design and sustainability.**
- We will:**
- a) **Preserve and enhance the most important areas and characteristics of Stevenage whilst delivering substantial improvement to the image and quality of the town’s built fabric;**
 - b) **Require significant developments to masterplanned to ensure the delivery of high-quality schemes;**
 - c) **Set out detailed design criteria and require applicants to have regard to Supplementary Planning Documents and other relevant guidance; and**
 - d) **Implement the Government’s optional Technical Standards to ensure schemes deliver the space, accessibility and water efficiency expected of modern developments.**
- 4.12. **Policy SP11:** Climate Change, Flooding and Pollution seeks to ensure that new development minimises and mitigates its impact on the environment and climate change by considering matters relating to energy, water consumption, drainage and contamination but not necessarily limited to those matters. The policy also seeks to ensure that development reduces or mitigates against flood risk and pollution.
- 4.13. **Policy SP12:** Green Infrastructure and the Natural Environment is a general policy seeking to protect and enhance the existing green infrastructure and natural environment of the Borough and refers to the need to preserve and enhance locally important linear landscape features including structural green spaces along major routes within the town.
- 4.14. **Policy SP13:** Historic Environment seeks to preserve and enhance the most important areas and characteristics of Stevenage and will seek Heritage Impact Assessments being carried out for development which impacts on heritage assets.

- 4.15. **Policy EC7:** Employment Development and Unallocated Sites states that new major employment development will not be permitted outside of allocated areas and centres. Additionally, this policy also addresses the circumstances for planning applications which seek development causing the loss of employment land on sites not allocated for any specific purposes. This part of the policy states

‘...planning permission for the loss of employment land on sites not allocated for any specific purpose will be granted where:

- i) There is sufficient suitable employment land available elsewhere;**
- ii) The proposals provide overriding benefits against other objectives or policies in the plan; or**
- iii) It can be demonstrated that a unit has been unsuccessfully marketed for its existing use, or has remained vacant, over a considerable period of time’.**

- 4.16. This part of policy EC7 is particularly relevant to the submitted planning application. Paragraph 6.34 of the Local Plan states that:

‘...The Council would normally expect a site to be of remained vacant and be actively marketed for a period of at least six months to satisfy criterion iii’.

- 4.17. **Policy IT4:** Transport Assessments and Travel Plans requires provision of such information in the context of a planning application and will need to demonstrate that as a result of the development no significant adverse impacts will result or steps can be taken to mitigate any adverse impacts to an acceptable level. Where residential developments exceed the Transport Assessment threshold they will be accompanied by an acceptable (green) travel.

- 4.18. In relation to parking and access, **Policy IT5** states that planning permission where granted will ensure that proposals comply with the parking standards set out in the Plan and have regard to any relevant supplementary planning guidance. Major development proposals of which our submitted application is one, will need to demonstrate how the development is served by passenger transport. The policy states that provision for pedestrians and cyclists will be addressed within the development as well as links into existing cycleway and pedestrian networks. Adequate landscaping and lighting of routes within and adjacent to the development will also be sought together with secure parking provision and facilities where appropriate.

- 4.19. In relation to Chapter 9 of the Local Plan concerning high quality homes, Policy HO5: Windfall Sites is relevant to submitted development proposals. Policy HO5 states:

‘Planning permission for residential development on unallocated sites will be granted where:

- a) The site is on previously developed land or is a small, underused urban site;**
- b) There is good access to local facilities;**
- c) There will be no detrimental impact on the environment on the surrounding properties;**
- d) Proposals will not prejudice our ability to deliver residential development on allocated sites;**
- and**
- e) The proposed development will not over burden existing infrastructure.’**

- 4.20. This policy acknowledges that windfall development can make valuable contribution towards housing supply and states in supporting paragraph 9.44 that ‘...proposals for housing development that meet the above criteria (and other relevant policies) will be granted permission.’
- 4.21. Paragraph 9.45 states that whilst the Plan has sought to identify sites required to meet its housing targets, it acknowledges that opportunities may arise on larger, previously developed sites where changes in circumstances has precluded their identification at the time of the drafting of the Local Plan.
- 4.22. Paragraph 9.47 states that applications for windfall development will only be permitted for schemes that are sustainable and will not have a negative impact on the surrounding area. Good access to local facilities will be required.
- 4.23. **Policy HO7:** Affordable Housing Targets states that planning permission will be granted for residential developments that maximise affordable housing provision based on agreed values and viability at the time of application. As it relates to previously developed sites, the Council will seek target levels of 25% of new homes on previously developed sites to be affordable housing.
- 4.24. The policy states that:
- ‘...Planning permission will only be granted when these targets are not at least achieved if:**
- a) **Developers robustly demonstrate that the target cannot be achieved due to site specific constraints resulting in higher than normal costs, which affects its viability; or**
 - b) **Meeting the requirements would demonstrably and significantly compromise other policy objectives.**
- 4.25. Paragraph 9.52 recognises that affordable housing requirements should not place an unacceptable burden upon willing landowners or developers and thus the targets within Policy HO7 could be affected by viability evidence.
- 4.26. Paragraph 9.54 states all major residential or mixed use schemes must be accompanied by a financial appraisal, based on current costs and development values at the time of the application. All appraisals will be subject to scrutiny and review by the Council’s Housing Team. It is the Council’s expectation that affordable housing provision will be maximised once reasonable costs and returns and other policy requirements have been taken into account. In the context where target levels cannot be achieved, the appraisal must set out particular circumstances and costs relevant to that scheme.
- 4.27. **Policy HO8;** Affordable Housing Tenure, Mix and Design requires that where affordable housing is secured through Policy HO7, then at least 70% of the units will be for rent with the remainder consisting of other tenures to be agreed with the Council’s Housing Team. In terms of mix, they will meet the requirements of Policy HO9 (see below) and will need to be tenure blind.
- 4.28. **Policy HO9 :** House Types and Sizes sets out the policy as it relates to these matters and is set out below:

‘Planning permission for residential schemes will be granted where:

- a) **An appropriate range of market and affordable house types and sizes are provided taking into account:**
 - i) **Structural imbalances in existing housing stock;**
 - ii) **The housing needs of the Borough, as informed by up to date and relevant evidence;**
 - iii) **The location and accessibility of application site and;**
 - iv) **Recent completions, existing completions and sites within the 5 year land supply.**

- b) **The resultant scheme would provide a density and character of development appropriate to its location and surroundings. Significantly higher density should be achieved in easily accessible locations and;**

- c) **Aspirational homes are provided in appropriate locations including; but not necessarily limited to:**
 - i) **New neighbourhoods to the north, west and south east of the town;**
 - ii) **Suitable suburban, edge of town sites;**
 - iii) **The town centre, Old Town and other highly accessible locations and;**
 - iv) **Other appropriate sites where aspirational homes will complement the prevailing character.**

4.29. Paragraph 9.67 states that recent trends suggest that the number of people living on their own will increase over time and consequently the Council accept the need to increase the number of flats and smaller houses that are available to provide a responsive range of accommodation and also to provide greater opportunity for first time buyers.

4.30. Paragraph 9.68 acknowledges that the original master plan for Stevenage involved building at relatively low densities but in the case where sites are easily accessible then substantially higher densities will be required to ensure the most efficient use of land. The plan acknowledges that higher densities can also help to support local amenities and the viability of passenger transport.

4.31. **Policy HO11:** Accessible and adaptable housing, confirms that planning permission for major residential schemes will generally be conditioned to ensure that at least 50% of all dwellings are Category 2: Accessible and adaptable dwellings (M4(2)).

4.32. Chapter 10 of the local plan relates to good design and as an important component part of the NPPF and the Local Plan this policy is set out in full below:

Policy GD1 : High Quality Design

Planning permission will be granted where the proposed scheme (as applicable):

- a) **Respects and makes a positive contribution to its location and surrounds;**

- b) Improves the overall ease of movement within an area for all users;
- c) Creates a safe environment that designs out crime;
- d) Creates, enhances, or improves access to, areas of public open space, green infrastructure, biodiversity and other public realm assets;
- e) Does not lead to an adverse impact on the amenity of future occupiers, neighbouring uses or the surrounding area;
- f) Complies with the separation distances for dwellings set out in this plan;
- g) Minimises the impact of light pollution on local amenity, intrinsically dark landscapes and nature conservation;
- h) Incorporates high quality boundary treatments when located on the street frontage;
- i) Complies with other relevant policies and has regard to guidance which may influence site layout and design, including (but not necessarily limited to):
 - i) Requirements relating to active frontages in Policy EC5;
 - ii) The car parking standards in Policy IT5 and the Parking Provision SPD;
 - iii) Site specific considerations identified in Policies HO1, HO2, HO3 and HO4;
 - iv) Housing mix requirements in Policies HO8, HO9 and H10;
 - v) Accessibility requirements in Policy HO11;
 - vi) SuDs and flood risk considerations in policies FP1 and FP2;
 - vii) Open space standards in Policy NH7; and
 - viii) Conservation Area guidance in Policy NH10.
- j) Meets and where possible exceeds, the nationally described space standards;
- k) Makes adequate provision for the collection of waste; and
- l) Has regard to the Stevenage Design Guide Supplementary Planning Document and any other appropriate guidance.

4.33. The above policy sets out the generic design requirements that are applied to all developments.

4.34. **Policy FP1** on climate change states that planning permission would be granted for developments that incorporate measures to address adaptation to climate change. **Policy FP2** relates to flood risk in Flood Zone 1 and confirms that appropriate Flood Risk Assessments will need to be submitted for schemes of 1 hectare or above.

4.35. **Policy FP8:** Pollution sensitive uses seeks to protect against unacceptably high levels of pollution including noise.

4.36. **Policy NH5:** Trees and Woodland seeks the provision of an arboricultural report in the context of proposals that affect or are likely to affect existing trees. Where the loss of trees is demonstrated to be unavoidable, then sufficient land will need to be reserved for appropriate replacement planting.

4.37. **Policy NH7:** Open Space Standards requires on site space provision be made in accordance with standards and thresholds set out in the Council's Green Space Strategy and acknowledges that where an applicant demonstrates that any element of the required provision cannot reasonably be achieved on site, then commuted sums will be sought.

National Planning Policy Framework

- 4.38. A revised National Planning Policy Framework (NPPF) was published in February 2019 and sets out the Government's national policies for England and how these are expected to be applied.
- 4.39. It reiterates (paragraph 2) that planning law dictates that applications for planning permission must be determined in accordance with the statutory Development Plan unless material consideration indicate otherwise. It also states that the Framework is a material consideration in the determination of planning applications.
- 4.40. The Framework states that the purpose of planning is to help achieve sustainable development (paragraph 7). It explains (paragraph 3) that the policies within the Framework should be considered as a whole when identifying sustainable development.
- 4.41. Paragraph 8 identifies the three objectives of sustainable development: economic, social, and environmental. It advises that these objectives are interdependent and should be pursued in mutually supportive ways. Paragraph 9 advises decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area.
- 4.42. Paragraph 38 advises that decision-taking should be approached in a positive and creative way to foster the delivery of sustainable development. It also states that decision-takers at every level should seek to approve applications for sustainable development where possible.
- 4.43. When assessing and determining applications, the Framework advises Local Planning Authorities to apply the presumption in favour of sustainable development, which is described at Paragraph 11, in the context of decision taking, to be:
- c) approving development proposals that accord with an up to date Development Plan without delay; or
 - d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:
 - the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
 - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole.

- 4.44. Paragraph 108 identifies the following considerations for decision takers to consider in the assessment of transport impact:
- 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; and
 - c) 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.
- 4.45. Paragraph 109 states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.
- 4.46. Chapter 5 of the NPPF relates to the delivery of new housing and at paragraph 59 acknowledges Government's objective of "significantly boosting the supply of homes".
- 4.47. Paragraph 67 requires authorities to have specific, deliverable sites for years one to five of the plan period and sites or broad locations for years 6-10, and, where possible, for years 11-15 of the plan. Land supply and delivery and the need for a five year supply is set out in paragraphs 73 to 76.
- 4.48. Chapter 7 of the NPPF refers to ensuring the vitality of town centres. In such a context the text refers to investment in such locations as well as acknowledging the importance of edge of centre sites having regard to accessibility and connectivity to such centres.
- 4.49. Chapter 8 of the NPPF provides guidance on healthy and safe communities confirming the importance of safe, accessible and well considered development proposals which promote social interaction, are safe and accessible and enable and support healthy lifestyles. The importance of open space both in terms of protection as well as part of new development proposals is referred to in paragraphs 96 to 98.
- 4.50. The promotion of sustainable transport measures are set out in Chapter 9 of the NPPF and at paragraph 103 refers to significant new development being focussed in locations which can be or are existing sustainable locations – the need to limit the need to travel as well as having a genuine choice of transport modes will all assist in reducing congestion and emissions and improve air quality and public health. Paragraph 110 refers to the need to ensure that development proposals create environments that are safe, secure and accessible to all, as well as being attractive.
- 4.51. Chapter 11 relates to making effective use of land in meeting the need for homes and other uses and at Paragraph 118c states that "... *planning decisions should... give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs.*"
- 4.52. At paragraph 121 reference is made to the need to use unallocated land for new homes and states:
- 'Local planning authorities should also take a positive approach to applications for alternative uses of land which is currently developed but not allocated for a specific purpose in plans, where this would help to meet identified development needs. In particular, they should support proposals to:

- a) *“Use retail and employment land for homes in areas of high housing demand, provided that this would not undermine key economic sectors or sites or the vitality or viability of town centres, and would be compatible with other policies in this Framework...”*

4.53. Paragraph 122 supports development that makes most efficient use of land having regard to different types of housing and other forms of development, the local market, the capacity of infrastructure and services, the need to maintain the areas prevailing character and setting or to promote regeneration and change as well as importantly securing well designed, attractive and healthy places. Paragraph 123 acknowledges the importance of increasing densities of residential development in locations where there is identified housing need.

4.54. The design and layout of new developments and the policy guidance relating to such matters is set out within Chapter 12 of the NPPF. Paragraph 124 confirms that good design is a key aspect of sustainable development and paragraph 127 sets out criteria to ensure a framework is provided to create distinctive places with a consistent and high quality standard of design. Paragraph 131 states:

‘In determining applications, great weight should be given to outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surrounds’.

4.55. The need to conserve and enhance the historic environment is addressed within Chapter 16 of the NPPF and at paragraph 189 confirms that local planning authorities should require applicants to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail required from applicants needs to be proportionate to the assets importance and no more than is sufficient to understand the potential impact of the proposal on the significance.

Planning Practice Guidance

4.56. The planning practice guidance states the following in respect of Built to Rent: *“Build to rent is a distinct asset class within the private rented sector, and has been defined in the National Planning Policy Framework glossary, in order to simplify its treatment within the planning system”*. The guidance refers to *“large sites and/or a town-centre regeneration”* as circumstances and locations where build to rent developments will be encouraged. (Paragraph: 001 Reference ID: 60-001-20180913 Revision Date: 13 09 2018).

In addition, the Planning Practice Guidance states in respect of affordable housing *“The National Planning Policy Framework states that affordable housing on build to rent schemes should be provided by default in the form of affordable private rent, a class of affordable housing specifically designed for build to rent. Affordable private rent and private market rent units within a development should be managed collectively by a single build to rent landlord.*

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20% is generally a suitable benchmark for the level of affordable private rent homes to be provided (and maintained in perpetuity) in any build to rent scheme. If local authorities wish to set a different proportion they should justify this using the evidence emerging from their local housing need assessment, and set the policy out in their local plan. Similarly, the guidance on viability permits developers, in exception, the opportunity to make a case seeking to differ from this benchmark.

National affordable housing policy also requires a minimum rent discount of 20% for affordable private rent homes relative to local market rents. The discount should be calculated when a discounted home is rented out, or when the tenancy is renewed. The rent on the discounted homes should increase on the same basis as rent increases for longer-term (market) tenancies within the development.” (Paragraph: 002 Reference ID: 60-002-20180913 - Revision Date: 13 09 2018).

5. Assessment of Development Proposals

- 5.1. In any assessment and determination of planning applications it is the case that this must be undertaken in accordance with the development plan unless material considerations dictate otherwise.
- 5.2. As Section 4 of this Planning Statement sets out, the development plan comprises:
- Hertfordshire Waste Development Framework 2012 and Hertfordshire Waste Site Allocations Development Plan Document (adopted 2012 and 2014)
 - Hertfordshire Minerals Local Plan 2002 – 2016 (adopted 2007); and
 - The Stevenage Local Plan 2011-2031 (adopted 2019).
- 5.3. The National Planning Policy Framework (NPPF) (Feb 2019) confirms at paragraph 2 that the NPPF is a material consideration in planning decisions.
- 5.4. Having regard to the above and the determination of the submitted detailed planning application, it is our view that the land use policy matters together with the impacts of development on the surrounding area will be the main issues for assessment.

Land Use Policy

- 5.5. The application site is not the subject of any allocation within the currently adopted Local Plan. Consequently, whilst the office building was constructed for employment uses, in planning terms it is classified as a 'windfall site' (this is defined as "*Sites not specifically identified in the development plan*" within Annex 2 of the NPPF).
- 5.6. In such circumstances Policy HO5 (Windfall Sites) and EC7 (Employment Development and Unallocated Sites) are relevant to the determination of this application. Both policies HO5 and EC7 are particularly relevant and set out a policy context where residential development is acceptable in principle on existing unallocated employment sites provided certain criteria are met.
- 5.7. In respect of Policy HO5 criteria a) and Policy EC7, the application is supported by a Planning and Marketing Report produced by CBRE which demonstrates that the site has been vacant for a number of years.. It outlines the marketing of the site and provides contextual office market analysis. This report concludes that there is sufficient and suitable land elsewhere within Stevenage Borough. The analysis of the Stevenage office market has demonstrated that there is a very weak demand from potential occupiers and as such the criteria has been fulfilled to enable consideration of alternative land uses at this site.
- 5.8. A key issue of course in the assessment of any application is the degree to which development proposals can be considered to be sustainable development given that the purpose of the planning system is to achieve this form of development.

A sustainable development

- 5.9. Paragraph 8 of the NPPF sets out three interdependent overarching objectives of sustainable development and in the context of this planning application we consider the following to be relevant in meeting such objectives.
- a) **Economic objective** – the provision of significant new residential proposals on the edge of Stevenage town centre reflects a commitment to investment into the town which not only brings forward much needed new housing in a highly central sustainable location but also will hopefully provide further stimulus to town centre transformation and redevelopment to meet objectives within the emerging Local Plan. The investment in the new housing site will generate a substantial number of new jobs both directly and indirectly on the construction and delivery sectors whilst introducing more spending power with new residents living close to available services and facilities.
 - b) **Social objective** – the construction of new homes in a highly sustainable location delivers the potential to create a strong, vibrant and healthy community whilst reviving a vacant site. The range of properties provided in the new development addresses the housing needs and with a high quality design and layout approach to create a safe environment with opportunities for interaction within a landscaped area that is a significant social benefit as a result of the proposals.
 - c) **An environmental objective** – the submitted development constitutes making effective use of best land in a sustainable location. In circumstances where the need to provide new housing is one of the key objective in the emerging Local Plan and within the NPPF (Paragraph 59), the use of a vacant unallocated employment site reflects a real opportunity to secure a sustainable form of development in this highly central location. The scale, nature, design and form of the development has evolved through careful analysis of site context constraints and opportunities and will deliver a new high quality residential neighbourhood in this location. The landscaping proposals facilitate new planting and have been designed to net gain in biodiversity.
- 5.10. Having regard to the above, in respect of Policy HO5 criteria b) it is clear that the site falls to be considered as a sustainable location with access to a wide range of local facilities. It offers close proximity to existing schools, shops, health services within the Old Town and the Town Centre. In addition the site is well related to Stevenage railway station.
- 5.11. Indeed it is the case that a large area of the centre of Stevenage is within a reasonable 25 minute walk of the site. Similarly, cycling distances to facilities are generally short and the isochrones showing walking and cycling accessibility are contained within the submitted Transport Assessment. Such cycling isochrones show that all of Stevenage is within a 25 minute cycle journey of the site, along with Letchworth and Hitchin.

- 5.12. It is the case that the extensive network of segregated walking and cycling routes adjacent and connecting to the application site will contribute to ensuring high levels of accessibility associated with the proposals – the segregated routes were designed to run alongside the primary road network when the New Town was designed and are grade separated at key junctions, including those on Lytton Way at the south-eastern and north-eastern corners of the site. On the eastern frontage of the site, there is a good quality segregated footway/cycleway running north-south and is part of the Sustrans National Cycle Route No 12 ‘The Great North Way’.
- 5.13. The site is well related to existing bus stops as identified in the supporting Transport Assessment. The bus station is location about 750m to the south east of the site via the existing walking and cycling routes. There are a number of bus routes as identified in the Transport Assessment.
- 5.14. In terms of rail, Stevenage railway station is located some 500m south of the application site with a wide range of services available.
- 5.15. Therefore it is quite clear that the site is in a highly sustainable location.

Land supply

- 5.16. The NPPF states as paragraph 7 that the purpose of the planning system is to contribute to the achievement of sustainable development with decisions having an active role in guiding development towards sustainable solutions. In doing so they should take local circumstances into account, to reflect the character, needs and opportunities of each area.
- 5.17. Policy SP7 of the Local Plan seeks the delivery of at least 7,600 new homes within Stevenage Borough. This positive policy does not seek to cap the supply of housing in the Borough.
- 5.18. Paragraph 67 of the NPPF (2019) states that planning policies should identify a supply of specific deliverable sites for years one to five of the plan period, and specific deliverable sites or broad locations for growth, for years 6 to 10 and where possible, for years 11 to 15. Paragraph 73 of the same document states that “*Local Planning Authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years’ worth of housing against their housing requirement set out in adopted specific policies*”.
- 5.19. Having regard to the need for local planning authorities to demonstrate a minimum of a five year housing supply, it is the case that in particular circumstances, certain buffers should apply (moved forward from later in the plan period).
- a) 5% to ensure choice and competition in the market; or
 - b) 10% where the local planning authority wishes to demonstrate a five year supply of deliverable sites through an annual position statement or recently adopted plan, to account for any fluctuations in the market during the year; or
 - c) 20% where there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply.

- 5.20. By virtue of the recent adoption of the Local Plan, the Applicant does not challenge the ability of the Council to demonstrate a five year housing land supply.
- 5.21. In respect of Policy HO5 criteria d) there is a requirement that windfall proposals will not prejudice the ability of housing to be delivered at allocated sites. It is acknowledged that the recently adopted Local Plan allocates a number of sites to deliver 4,700 new homes at Policy HO1. In addition to identified allocations, Policy HO1 makes an allowance for windfall sites to come forward across the plan period. The proposals will help to create confidence in Stevenage as a location for development and regeneration. This development could therefore encourage investment to help to seek to transform the centre of Stevenage. It is clear that the proposals will make a significant contribution towards the delivery of new homes in the Borough.
- 5.22. The proposals include the supply of much needed affordable housing within the Borough. As reported by Stevenage Borough Council within its Annual Monitoring Reports for the period 2011/12 to 2017/18, there has been a supply of just 245 affordable dwellings. This supply equates to an annualised average of 35 affordable dwellings per year. . Comparatively this proposal proposes the delivery of 52 dwellings for affordable rent which exceeds recent levels of delivery and is equivalent to 21% of the total affordable housing supply achieved to date within the plan period.
- 5.23. We are of the view that the proposals should still be supported given that they are consistent with the policies in the adopted Local Plan and that there are significant benefits arising from the redevelopment of an unallocated site for new housing in a central location within Stevenage.

Impact on Character and Appearance of the Area

- 5.24. The Applicant acknowledges that the demolition of the existing buildings and structures on the site and their replacement with seven new apartment buildings will constitute a significant change when considered in the context of the immediate locality of the site. The existing buildings at the site reflect an architectural approach of its time designed with a commercial perspective, it is the case that the construction of the existing floorspace in terms of floorplates, cores, service areas are not appropriate for modern office uses. Certainly it is the case if commercial floorspace was to come forward now it would not be based on the design and layout of the existing office buildings.
- 5.25. The redevelopment of the site for housing should be seen as part of the wider potential for a modern approach to securing new development and investment and to act as a catalyst to other development opportunities in the town centre. At the time of writing Stevenage Borough Council has recently published regeneration plans for Stevenage Town Centre.
- 5.26. Policy SP1 which states that the Council will take a positive approach to reflect the presumption in favour of sustainable development, supporting proposals that are in accordance with the Local Plan. On the basis that such support is qualified given the need to be addressing social, economic and environmental conditions in the area, we feel that all these objectives are being addressed by the development proposals.

- 5.27. Policy SP2 regarding “Sustainable Development in Stevenage” – the policy is referred to in Section 4.24 of this Statement. It provides a helpful policy check to assess development proposals and is written in a positive manner insofar as stating consent will be granted where proposals can demonstrate (where applicable) that the listed criteria can be met.
- 5.28. In such a context, we set out general comments in italics against each of the policy tests (in bold text)
- a) **Deliver houses or jobs that make a positive contribution towards the targets in this plan**
A total of 576 dwellings are proposed within the submitted application which constitutes a significant investment in this central site and clearly a substantial amount of new homes to assist the Council in meeting its District Wide needs set out in Policy SP77 of the Local Plan. The new homes would make a significant contribution towards the delivery of 2,950 new homes “in and around the Town Centre” (Policy SP7).
 - b) **Supply a mix of uses, make good use of land and maximise opportunities for brownfield redevelopment within the town**
The development proposals constitute new residential development comprising a mix of tenures and sizes ranging from studio to 3 bedroom apartments. As previously indicated, such proposals make use of a large brownfield site in sight of the Town Centre. This application correlates with criterion e of Local Plan Policy SP7 which states that the Council will “Support applications for housing development on unallocated sites when they are in suitable locations and will not exceed our environmental capacity.

Whilst the term “environmental capacity” is not defined in the Local Plan, we would suggest that the scale, form, nature and importantly location of our proposals do not have adverse impacts to suggest exceedance to the point where significant impact occurs.
 - c) **Regenerate areas of the town that are underperforming.**
The development proposals reflect investment in a site that is vacant on the edge of a Town Centre where there are ambitious plans for redevelopment. A substantial new residential development on the site will provide confidence and act as a catalyst to stimulate investment elsewhere, and particularly the Town Centre and those areas identified for redevelopment in the Local Plan.
 - d) **Reduce deprivation, improve quality of life and make sure that residents share in the benefits of regeneration and growth**
This new development has been carefully designed to ensure the provision of new high quality housing in a modern, safe and attractive environment. The site is located close to the town’s services and amenities and is highly accessible. It presents a real opportunity to secure new housing in a highly sustainable location in Stevenage.
 - e) **Raise the aspirations, earnings, education level or life expectancy of residents**
The provision of modern new housing in a sustainable location close to services and amenities should contribute to such goals.

f) **Provide a mix of housing and jobs for all sectors of the community.**

The development proposals comprise a mix of tenures and dwelling sizes ranging from studio to 3 bedroom apartments. It will contribute to meeting need for owner occupation, private renting and affordable housing.

g) **Promote journeys by bus, train, bike and foot and reduce the need to travel**

The site is a highly central site and as previously set out in this Planning Statement and in the submitted Transport Assessment, it is highly accessible to all modes of transport including cycling and walking and with access to bus and rail services.

h) **Work within the limits of infrastructure and increase capacity where this is necessary to support development**

The application is supported by relevant technical reports to support the development proposals and to ensure the delivery of new housing without causing significant adverse impact on infrastructure.

In accordance with Policy SP5 'Infrastructure', it is anticipated that a Section 106 Planning Obligation will be required in order to secure benefits including affordable housing, on-site and off-site public open space and play provision, Sustainable Urban Drainage and its respective maintenance. It is anticipated that further detailed discussions concerning the scope of the S106 will be entered into once consultation responses have been received from consultees and other stakeholders.

i) **Make high quality buildings and spaces that respect and improve their surroundings, reduce crime and the fear of crime**

It is the case that the site is located in a prominent location within Stevenage and consequently it has been important for the appointed design team to analyse the site and its surroundings and to assess appropriate scale and form of new development. The submitted Design and Access Statement has assessed a number of options before securing the design which is the subject of this application.

The floor plans are designed around two typologies with the blocks consisting of studio, 1, 2 and 3 bedroom apartments providing eight units per floor. With the external space of the blocks benefitting from enhanced landscaping banking particularly along Lytton Way together with the retained pedestrian and cycle routes, it is considered that the design quality is of a high standard allowing for a new, safe, attractive residential environment. This is fully explained within the submitted Design and Access Statement and Landscape Strategy.

j) **Support facilities and services that encourage people to live, work and spend leisure time in Stevenage**

The delivery of a new significant residential development in central Stevenage brings forward the opportunity for new residents to spend money and bring investment into the town, thus supporting existing business and firms and with other development in the centre to act as a catalyst for new businesses to locate within central Stevenage.

k) **Produce places and spaces that enable people to live a healthy lifestyle**

As stated above, the positioning of the new residential blocks within the site allows for a Landscape Strategy to be applied which retains much of the trees and grassed bank areas, particularly on Lytton Way. Areas of landscape within the centre of the site will allow for amenity areas for residents and there are planned access routes in and out of the site to encourage travel to work, leisure on foot and by bike; supporting healthy lifestyles. The designs also incorporate balconies which provide private amenity space for residents.

l) Take a proactive approach towards energy use, including renewable energy and energy efficiency measures where practicable and appropriate

The submitted energy technical report states that there will be an 11.65% cumulative savings of carbon dioxide emissions through the application of a strategy which includes enhanced building fabric specification, community heating using high efficiency commercial boilers and photo voltaic panels.

m) Avoid or prevent harm from flood risk, contamination or pollution

In accordance with Policy SP11 'Climate change, flooding and pollution', the application is supported by flood risk assessment, ground conditions, air quality report and noise impact assessment.

The flood risk assessment which confirms the site is located within Flood Zone 1, as such it has the lowest risk of fluvial flooding. In the design of the Drainage Strategy responds to existing surface water pooling at the site and incorporates Sustainable Urban Drainage techniques including: a dry pond, below ground cellular attenuation, permeable paving which will connect into the existing drainage network. This strategy has been designed to ensure that the development does not increase the potential of flooding on or beyond the site.

The site has been judged to have a low risk for contamination, with possible contaminant hot spots. Redevelopment of the site acts as an opportunity to remove contaminant found and remediate the site as required for sensitive residential land use.

n) Protect and improve important open spaces, wildlife sites and habitats

Setting aside the importance of open spaces for their functional use, we would confirm that the submitted ecology report confirms that the existing habitat dominated by scattered trees and ornamental shrubs, is judged to be of low ecological value. Whilst the habitat may have potential for resting birds and foraging and commuting bats, there are no other habitats on or immediately adjacent to the site that show potential to support any protected flora or fauna. Within the design approach a biodiversity net gain is secured for the site through the landscaping strategy.

o) Preserve or enhance areas and buildings of historical and archaeological interest

A Heritage Statement is submitted in support of the submitted application stating that the development poses no harm to the special interests which lend the designated Conservation Area at the Old Town and the assets within it their significance.

p) **Increase community awareness and involvement so that residents are involved in, and proud of their town**

The Applicant has held a pre-application exhibition to share with the local community and local Councillors the redevelopment proposals for the site. More details of the public exhibition can be found in the submitted Statement of Community Involvement.

As part of a Residential Travel Plan (RTP), a marketing and communication strategy will be put in place to aim awareness of the Travel Plan and to encourage residents to change modes of travel in and around the town.

- 5.29. It is clear from the assessment of the development proposals against all the criteria within Policy SP2 that there are clear material benefits arising from the application and in such circumstances, planning permission should be granted.
- 5.30. Strategic Policy SP8 relates to good design and is relevant to this application. The detailed Design and Access Statement supports the submitted planning application and it addresses the policy through the advancement of high quality residential development with high standards of sustainability. The Design and Access Statement has considered the historical context of the site and analyses the scale and character of surrounding development whilst assessing the nature and form of the development on the existing site. From this work, flows the assessment of differing options for high density residential development on the site, concluding on a preferred option which is the subject of this submitted application. The proposals are set out within the document with an assessment of the plan form, elevations and access and servicing.
- 5.31. The approach undertaken by the Applicant's design team has responded directly to the relevant policy context and as such, specific reference is made to Policy GD1 on High Quality Design.

Technical Reports

- 5.32. Having regard to the detailed nature of the planning application it is the case that there are a series of technical based reports that are submitted to the Council which demonstrate that there are no technical reasons as to why the development cannot proceed. A summary of these documents is set out below but any detailed assessment should be made of the full submitted reports.

Energy

- 5.33. Regarding energy matters, it is proposed there will be one plantroom onsite located in Block 6, this will provide space heating and hot water. There will be boosted water storage tanks in Blocks 2 and 6.
- 5.34. A Building Management System will be incorporated into the design of the plantrooms to monitor the plant remotely. Each dwelling will be provided with their own heat meter at the Heat Interface Unit so the residents can be changed based on their use.
- 5.35. Low nitrogen oxide commercial gas boilers will be specified for the community heating scheme to ensure that the local air pollution levels are not increased.

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- 5.36. Photovoltaic panels will be installed to serve the landlord's supply; therefore, the benefit from the system will be shared proportionate to the size of the dwellings.
- 5.37. In seeking to restrict the amount of structures in external areas, a single substation is proposed to be erected in the southern part of the site.

Ecology

- 5.38. The ecological report proposes the provision of bird boxes, bat boxes and bat tubes. The ecological report proposes incorporating the enhancement of the boundary hedgerows and tree lines.
- 5.39. The submitted Ecological Report recommends that trees and care is taken when clearing vegetation / cutting back trees, hedgerow and shrubs at the site. It is also advised that this work is completed outside of the main bird nesting season.
- 5.40. A Biodiversity Net Gain Assessment quantifies that the proposals will result in a positive net change in habitats.

Acoustics

- 5.41. An Acoustic Report has been prepared by consultants and submitted to assess the suitability for residential development in terms of noise and vibration levels. A noise and vibration survey was carried out at the site between the 18th and the 28th April 2016 with a further validation survey carried on 18th July 2019. Noise levels at the site are dictated by road traffic noise emissions from A602, rail traffic on the adjacent railway line and air traffic noise associated with Luton airport.
- 5.42. Acceptable internal noise levels are predicted to be achieved in habitable rooms of the development subject to the adoption of acoustically upgraded glazing and ventilation in the development design. This will be investigated further at the detailed design stage and are anticipated being secured by the imposition of a noise related planning condition if deemed necessary by the Local Planning Authority.
- 5.43. The guidance on acceptable noise is provided within the currently adopted British Standard BS8233:2014 and states: *'For traditional external areas that are used for amenity space, such as gardens and patios, it is desirable that the external noise level does not exceed 50dB LAeq, T, with an upper guideline value of 55 dB LAeq, T which would be acceptable in noisier environments'*
- 5.44. As stated within BS8233:2014, these desirable target noise levels are primarily for private gardens or larger amenity areas intended as spaces for rest and relaxation. The targets are not intended for smaller balconies, such as those included within this scheme: *'Other locations, such as balconies, roof gardens and terraces, are also important in residential buildings where normal external amenity space might be limited or not available, i.e. in flats, apartment blocks, etc. In these locations, specification of noise limits is not necessarily appropriate. Small balconies may be included for uses such as drying washing or growing pot plants, and noise limits should not be necessary for these uses. However, the general guidance on noise in amenity space is still appropriate for larger balconies, roof gardens and terraces, which might be intended to be used for relaxation.'*

- 5.45. The apartments include small balconies where strict application of noise limits is not necessary under BS8233. The balconies also act as a design feature, providing articulation to the façade.
- 5.46. The purpose behind the approach within BS8233:2014 is to provide flexibility, so that needed development in central, highly sustainable locations is not thwarted. BS8233:2014 states that the guideline values “*are not achievable in all circumstances where development might be desirable*” and this includes higher noise areas such as city centres or urban areas adjoining the strategic transport network. It goes on to state that in such locations a compromise between elevated noise levels and other factors might be warranted and development should not be prohibited. Significant development in and around Stevenage Station is clearly highly desirable, and is a highly sustainable location for development, precisely the sort of location where it is envisaged that such a compromise might be required.
- 5.47. Having regard to the above, it is considered that the proposals are acceptable when assessed against relevant policies including Policy FP7 ‘Pollution’ and FP8 ‘Pollution Sensitive uses’.

Geotechnical issues

- 5.48. Consideration has been given to the ground conditions at the site. It has been identified by Geosphere Environmental Ltd that in general the risk of contamination is low, with some contaminants being considered to be present as hot-spots. It is recommended that further site investigation is completed post demolition. Redevelopment of this site therefore provides the opportunity to remove potential contaminants and complete remediation works as required. This scheme of works can be secured via condition.

Arboricultural Impact Assessment

- 5.49. An Arboricultural impact Assessment has been undertaken and is submitted as part of the application. The report notes that the trees on the site surround each boundary and that there are a number of early mature trees of modest amenity value with younger trees located within the site amongst the existing buildings, most of low quality and landscape value.
- 5.50. Whilst it is the case that trees have been recommended to be removed to facilitate construction, these are all of low to moderate amenity value. The amenity value of these trees can easily be replaced through replanting following construction.
- 5.51. The report recommends that particular attention should be paid towards replanting of trees on the bank along the eastern boundary to replace those lost facilitating the development.
- 5.52. In the instance where multiple hard surfaces are to be required throughout the site, particularly around the car parking areas along the western edge, these will require a no-dig surface and cellular confinement system, specifications of which can be provided within a detailed Site Specific Arboricultural Method Statement (SSAMS) at the appropriate time.
- 5.53. The recommendations of the Arboricultural impact Assessment have been incorporated into the Landscape Strategy for the site.

Heritage Statement

- 5.54. It is considered that the proposed development poses no threat of harm to the special interests of the Conservation Area, the assets within it and their significance. A Heritage Statement is submitted as part of the application. It concludes that the proposed development is considered to be compliant with the policies set out in Section 6 of the Stevenage Old Town High Street Conservation Area Management Plan (CAMP) (a supplementary planning document), adopted in July 2012.
- 5.55. Indeed, paragraph 7.14 of the Local Plan encourages the proposed construction of taller, higher-density buildings in Major Opportunity Areas (MOA) adjacent to Conservation Areas (CA). While the application site is not within a MOA, the principle of high-rise buildings being constructed in proximity of the CA is established as acceptable (subject to careful design and management).
- 5.56. The proposed development is considered to be in line with the guidance set out in paragraph 200 of the NPPF, as the works will not materially affect the CA. The existing office building is a detracting feature in the wider context of the CA, despite having a limited visual impact on the CA and on Zone 3 in particular. The materials palette and style of the existing building draws the eye away from the traditional buildings within the CA. It is therefore considered that the replacement of the office building with more sympathetic materials palette and a more permeable grain would enhance the wider context of the CA.
- 5.57. Thus, in accordance with Policy SP13 'The Historic Environment' and the requirements of the NPPF, the Heritage Statement concludes that the proposed development preserves and enhances the character and appearance of the Stevenage Old Town Conservation Area.

Transport Assessment and Travel Plan

- 5.58. It is proposed that the existing access will be retained for the residential development. In accordance with Policy IT4, the application is supported by a Transport Assessment produced by WSP. This confirms that the number of vehicular trips to be generated by the residential development will change the pattern of vehicular trips from a destination point associated with the existing office. WSP has judged the impact of the proposed development and it is not deemed to meet the threshold of severe (109 of NPPF) when compared to the 2024 future baseline with office land use scenario.
- 5.59. In respect of Policy SP5, the Transport Assessment concludes 'due to the site's accessibility by non-car modes and the minimal net impact of the proposed development, the need for major transport infrastructure is considered unnecessary'.
- 5.60. The Transport Assessment demonstrates that the proposed vehicular and cycle parking provision accords with the standards contained within the Stevenage Borough 'Parking Provision SPD' as required by Policy IT5.
- 5.61. The WSP Travel Plan proposes a target of a 5% reduction in the development's trips being made by car in preference for more sustainable modes of travel.

6. Conclusions

- 6.1. The Applicant, Hill Residential Ltd, seeks full planning permission for the "*Demolition of existing office building (B1 use) and structures, and the construction seven apartment buildings comprising 576 dwellings (C3 use) together with internal roads, parking public open space, landscaping, drainage and associated infrastructure*" at land to the west of Lytton Road, Stevenage.
- 6.2. The application proposal makes best use of a redundant vacant brownfield site that is located in a highly sustainable and accessible location within Stevenage. The development would make a significant contribution to the supply of new housing in and around the Town Centre in accordance with Policy SP7 'High Quality Homes'. No harm would arise from the loss of office floorspace and the development accords with Policy EC7.
- 6.3. This Planning Statement contains a detailed assessment of the proposal and demonstrated compliance with relevant Development Plan in particular: Policy HO5 'Windfall Sites', HO7 'Affordable Housing', HO8 'Affordable Housing Tenure, Mix and Design', Policy HO9 'Housing Types and sizes', Policy SP2 'Sustainable Development in Stevenage', SP8 'Good Design', and GD1 'High Quality Design'.
- 6.4. The application documentation demonstrates that there are no significant or demonstrable adverse impacts that would outweigh the benefits of granting planning permission and boosting the supply of housing.
- 6.5. The Council has ambitious plans for the regeneration of Stevenage and its Town Centre. These proposals will make a significant contribution towards achieving those objectives and provide others with the confidence to invest in Stevenage. The National Planning Policy Framework advises in respect of decision taking that proposals that accord with an up-to-date development plan should be approved without delay. It is therefore respectfully requested that this planning application be granted.

Planning Statement

Land west of Lytton Way, Stevenage



Appendix 1 – EIA Screening Response from Stevenage Borough Council

Planning and Engineering

Head of Planning and Engineering: Zayd Al-Jawad

Mr Garth Hanlon
Savills
Unex House
132-134 Hills Road
Cambridge
CB2 8PA

Our Ref: 16/00780/SCR
Contact: Clive Inwards
Direct Line: 01438 242837

E-Mail: clive.inwards@stevenage.gov.uk

Date: 6th December 2016

Dear Mr Hanlon,

RE: PROPOSED REDEVELOPMENT OF UP TO 540 DWELLINGS AT THE ICON SITE, LYTTON WAY, STEVENAGE, HERTS.

TOWN AND COUNTRY PLANNING ACT (ENVIRONMENTAL IMPACT ASSESSMENT) (ENGLAND AND WALES) REGULATIONS 2011: SCREENING OPINION UNDER REGULATION 5(1)

A Screening Opinion is requested to be undertaken by this Council on the above proposal to consider whether it falls within Schedule 1 or 2 of the above Regulations and whether or not an Environmental Statement is required to be submitted.

Screening opinion

1. The proposal to redevelop the existing site is not considered to fall within Schedule 1 of the EIA Regulations.
2. The proposed development is considered to fall within Section 10b of Schedule 2 of the EIA Regulations as it relates to an urban development project.
3. The proposed development is not located in an area designated as a "sensitive area" in the terms of the EIA Regulations.

4. The proposed development exceeds the criterion applicable to the above section of Schedule 2 of the EIA Regulations as the proposal relates to a site greater than 0.5 hectares.
5. As the proposed development is within Schedule 2 of the EIA Regulations this Council is required to undertake a screening opinion.

Characteristics of the development

The proposed development comprises the redevelopment of the existing office building on the site to provide circa 540 residential dwellings, car parking, open space and associated works. The site area comprises approximately 2.7 hectares.

It is proposed that residential use will cover the majority of the site, comprising seven residential blocks of varying heights with the tallest elements being at either end of the site comprising a 16 storey block at the southern end and a 15 storey block at the northern end. The vehicular access into the site will continue to be from Lytton Way. On the basis of the submitted information the proposed development is not considered to be of more than local importance and is unlikely to have wide ranging environmental effects.

Location of development

The site is located in a transitional area between the Old Town area of Stevenage and the town centre of the New Town, approximately 750m from the bus station in the town centre. The site is 2.7 hectares in size and includes the existing office building, the car park and landscaped areas around the edge of the site.

The site is bounded to the north by Trinity Road, the Lytton Way petrol filling station and then a flatted scheme in Monument Court beyond. To the east the site is bounded by Lytton Way and a mixture of former office buildings currently being converted to residential use and also a mixed use of residential, offices and a hotel. The site is bounded by the East Coast mainline to the west with residential use beyond and to the south the site is bounded by Fairlands Way and the station car park beyond. The site is accessed by a vehicular entrance off of Lytton Way to the east. The site does not lie in a designated “sensitive area” or in close proximity to such an area.

Characteristics of the potential impact

The proposed demolition and construction is unlikely to have any unusually complex or potentially hazardous impacts. Impacts arising from demolition and construction are likely to comprise noise, dust, vibration and HGV movements; however these would be for a temporary period only and can be suitably controlled by best environmental practice.

Planning Statement

Land west of Lytton Way, Stevenage



The potential impacts of the final residential use are unlikely to constitute 'significant' impacts in terms of the Environmental Impact Assessment Regulations.

Overall Conclusion

It is concluded, following an assessment of the proposed development in the terms referred to in the EIA Regulations and the National Planning Practice Guidance, that the potential impacts would not be considered to be significant in terms of the Regulations and NPPG. An Environmental Impact Assessment is, therefore, not required to be submitted with the planning application to redevelop the site for residential use.

Neither this statement or any statement within the screening opinion should be taken as precluding the Local Planning Authority from concluding that the development would have local environmental impacts albeit not significant in the terms of the Regulations.

A copy of this screening opinion will be placed on the Planning Register

Yours sincerely

Zayd Al-Jawad

HEAD OF PLANNING and ENGINEERING