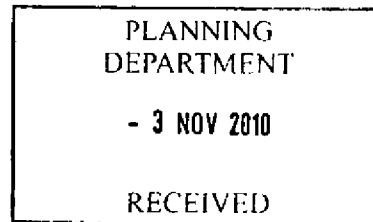


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[Redacted]
4 Elmwood
Welwyn Garden City
Herts AL8 6LE
[Redacted]

01 November 2010

The Planning Department,
Welwyn Hatfield Borough Council

Dear Sirs

**Re: Planning Applications N6/2010/2055/MA & N6/2010/2060/LB
Comments on Spenhill Regenerations Broadwater Road proposals.**

“With the exception of the Tesco store, all of the other uses..... are totally in line with the Councils adopted planning policy.”

-Spenhill Regenerations own statement as published on the boards displayed at their public exhibition of their proposals in February 2009.

“There is a limited capacity for additional convenience sales floorspace in the Borough for the foreseeable future (i.e. up to 2016).

There is no requirement for further large food store development over and above existing commitments.”

-Nathaniel Lichfield & Partners report ‘Retail and Town Centre Needs Assessment’ for WHBC; 2007 (Para 10.70; repeated at Para 13.6), a report which Spenhill itself attempts to use to justify its proposals.

The Councils own published and adopted policies (EMP3 and SPD Para 5.9) clearly set out the acceptable for the (Broadwater Road West) site to be employment, housing, leisure and rail related uses only and published comment made by the Councils representatives back up and confirm this stance and policy.

Spenhill seem to have ignored their own acknowledgements as to the non-suitability of the site for retail use and have pressed ahead with their proposals, to include the said retail use, apparently on the pretext of it being required to facilitate and secure the delivery of other aspects of the development of the site. Then, on that basis, they seem to have proceeded with the preparation of full and detailed plans for that part of the site which includes the proposed retail store. Moreover, in their submitted Design and Access Statement they imply, in their Planning Consultation reports, that they have incorporated responses to comments made by CABE, English Heritage and the Council, including detailed design issues, on the apparent assumption that Planning Permission will be granted when clearly the need for major Retail Use has not been established and has not been approved.

The two submissions received by the Council are a curious mix – on the one part as a detailed submission; on the other part as an outline submission and whereas they might or might not follow the context of the SPD it would be better if the whole development of the site was considered in respect of the Spenhill controlled land and that of the other land owners. It prompts the question as to whether, if permission is granted for the Retail Store, then will any other parts of the development be built by

Spenhill (not withstanding the assurances given by them at their exhibition). Also, if the detailed application is refused but the outline application is approved will this not put a block on a more considered approach to alternative development of the site.

The focal point of the scheme is described as a new Civic Square and with the retail store, leisure and other activities being linked to this and to the existing town centre via the (renovated) pedestrian bridge link. But the submission documents themselves acknowledge the major barrier that the intervening rail land creates; along bridge link devoid of any intermediate shopping attractions with no continuity of streetscape to sustain the envisaged crossflow between the town centre and the proposed development. What are the prospects for this Civic Square then? – an infrequent Farmers Market, occasional organised activities perhaps; this surely cannot attract pedestrian traffic from the town centre; it is simply too far and could only be undertaken by the young, fit and healthy. Pedestrians are unlikely to cross to shop at the proposed retail store - it is simply too far to be carrying heavy shopping bags back to the town centre. Is crossflow likely to occur in the other direction, from retail store to town centre? – no; people that have driven to the retail store are implicitly much more likely to get back into their cars and drive round to the town centre.

The Civic Square is portrayed in the public exhibition and planning submission documents as surrounded by pristine white buildings under a Mediterranean blue sky with lots of casual relaxed activities occurring; the reality is more likely to be akin to the current Hatfield town centre on a wet and windy day. If a civic square is required for the town then surely its need should be generated by its citizens and should be placed at the centre of the town, say in a remodelled Howardsgate, Parkway or Campus but certainly not in a location which would preclude a great many of its inhabitants from easily getting to it.

As to the detail of the proposed schemes; it seems to be a little irrelevant if the basic land use issue has not been resolved; but one particular point of concern is the question of traffic generation and management, with proposed car access to the site and to the main underground parking area being located at the Hydeway junction and with totally inadequate traffic control measures being indicated, which would have serious impacts on the flow of traffic at the Bridge Road junction and along Broadwater Road generally.

In their submission documents Spenhill advise that 95% of respondents to their exhibition questionnaire were supportive of their proposals (on a low response of those attending). The recent public meeting held to discuss the current proposals most certainly did not reflect that support, with considerable opposition to the notion of A new Retail store being allowed on this site.

Finally it has been rumoured that should the retail store be granted permission, then other retail organisations might consider taking action against the Council for failing to follow the due and proper process of planning being followed – another Galleria/Howard Centre scenario? We hope not!

Yours Faithfully

