

**Planning Application: 6/2020/3420/MAJ**

**Major Development at BioPark, Broadwater Road, Welwyn Garden City, AL7 3AX**

**26 January 2021**

## **“Broadwater Gardens”**

### **Public Consultation – Objections**

#### **Introduction**

I am a long-term resident of Welwyn Garden City and have moved into Salvisberg Court on the former Roche site within the last year. My flat overlooks part of the BioPark site. I therefore have a significant interest in this proposal. I have spent a substantial amount of time studying the details of the proposal in order to hopefully provide an informed view; that view is necessarily constrained by the large amount of information provided in the Application, and by my status as a layperson in planning and development matters. I raise a number of objections, both from how the development would affect me personally and also from the point of view of future residents of the development who would have a similar personal profile to mine.

It is clear that a development on the BioPark site is likely to happen in some form. That is to be welcomed because the site is currently visually unappealing and does not sit well in the context of the existing Mirage Development. Nor probably, and more importantly, is it likely to sit well undeveloped within the overall Broadwater Road West development. The Broadwater Road West area is well suited to the development of additional housing as Welwyn Garden City's contribution to meeting the Hertfordshire and National need for new homes. I therefore support demolition of the existing structures needed for a redevelopment to proceed.

It is clear that a great deal of thought, time and effort has gone into the preparation of this Proposal. The Proposers have clearly had a number of meetings with WHDC and other interested parties. This has led them to modify their original proposal in a number of iterations. I do however assume that it is not a “given” that the proposal will be approved as formulated.

Indeed, I have serious concerns about the viability of what is being proposed. In fact, I would go further: I think that if the Council permits this development as proposed then it is potentially heading for a planning disaster. The following are my specific objections and comments that led me to that conclusion.

#### **1. Access to individual dwellings for delivery of goods and services.**

Firstly, I have major concerns on the restricted vehicular access and on the constrained service access to supply individual homes - they create foreseeable issues that the residents will face in their day to day lives. This could have an unexpected knock-on effect into surrounding areas. The Application gives due consideration to arrangements for waste collection at different locations within the development and collection of that waste for disposal on a weekly basis. There is however comparatively little consideration of how material has been brought on to the site in the first place in multiple individual "transactions". Similarly, there is scarce consideration on the requirement for other "service transactions".

To start with moving in or moving out. From day one, the occupants for the 289 properties will need to move in. Of course, they won't all arrive at once, but this will be a significant activity over an extended time period. And also, given the nature of the properties, once the site has been "populated" a significant number may be rented with a higher turnover of occupants as time progresses, potentially leading to a higher than average number of moves. Normally, removal companies would look to park as close as possible to the dwelling entrance. That is not allowed for here. There are bollards restricting access, and the entrances to the Blocks aren't designed for occasional close parking of removal vans. Two small loading bay spaces are provided centrally for use by service vehicles - with no guarantee that a space is available. The unloading difficulties so created may also be hampered by inclement weather. And also by the competing presence of other large vehicles, such as refuse collection.

Aside from removal events, it needs to be recognised that with the Pandemic particularly, on-line shopping which had already been showing significant year on year increases has become a much more established activity. Foremost among those are on-line grocery deliveries, with all the major supermarkets actively involved. And larger items of furniture, for example, though infrequently purchased, will continue to be a "delivered requirement". There will be also be a significant number of daily deliveries by a range of "white van" deliveries (Amazon etc.). Delivery needs to be provided to the resident's front door. "Come and get it" from some sparsely provided central point just isn't realistic; the resident may not have the physical capacity to collect the items or may be unable to leave their home. The delivery person needs easy access to the entrance of each Block in order to make a delivery in this way

With the presumption that a significant number of properties will have no associated car it follows that there will be a significant number of residents whose options for food shopping are either 1) go on foot and carry it all back, 2) go by taxi and somehow get yourself and the shopping to your home, 3) have assistance from a friend or relative, or 4) have an on-line delivery to your doorstep. In all cases, some residents will be constrained in their options by virtue of age, disability, childcare or other needs. And those residents with cars and parking spaces will also be consumers of online shopping, both for groceries and for other items.

Additionally, some residents will need to be visited on a regular basis for medical or other support. The provider of those "Support Services" will work to a timetable and will need access to suitable parking. How, for example, do "meals on wheels" operate here?

The top-level Planning Application "Brochure" document (3000\_DAS\_PLANNING\_HQ) addresses services and deliveries to the site at Section 4.4. This seems to be the only reference to enabling these important activities in the Application. The information provided is limited to:

*"A servicing bay has been provided within the hard landscaping at the centre of the site. This space will also serve as Drop-off taxi space and delivery space for residents. The commercial unit will also use this bay."*

Note. Space for a waiting taxi **collecting** a resident is not mentioned. And:

*"Post for residential properties will be delivered to secure letter boxes at the ground floor of each core. For other deliveries, delivery vehicles can use the loading bays located in the central landscaped area. The townhouses will each have individual letter boxes."*

Whilst the drawing accompanying the text marks "loading bays" in yellow, they do not seem to be specifically identified in any of other plans submitted. The servicing and delivery requirements raised here do not seem to be addressed in any other part of the Application. There is therefore no indication of the estimated capacity required, and no indication of exactly what is to be provided, although it looks to be 2 spaces shared among all the deliveries for 289 dwellings and spaces that are also to be used by the Commercial Unit.

The National Planning Policy Framework (February 2019) identifies three key transport tests at Section 108; the second test at 108 b) identifies the requirement for:

*"safe and suitable access to the site can be achieved for all users"*

My point is that my concern is that a number of "users" will find it difficult, or nearly impossible, to make deliveries or collections. The "suitable" requirement is not therefore being met. The WHBC draft Local Plan, Policy SADM 12 addresses Parking, Servicing and Refuse and states:

*"With regards to refuse and servicing, new developments should ensure that access to refuse storage and services areas are appropriately sited and designed."*

The definition of services should not be interpreted too narrowly. The postal delivery, collection and delivery of parcels to individual dwellings by other carriers, on-line grocery deliveries, visits by persons rendering assistance and personal services to residents, and house removals should all be included within the "service" definitions. And the resident's building entrance and front door are the "service areas" No appropriate consideration has been given to these services. And the services I have highlighted are all key requirements of a development; their viable delivery must be a part of any Application of this type.

**Objection 1: the proposed development does not meet National Policy Framework requirements for the safe and suitable access for all users. The proposed development is not compatible with WHDC policy requirement SADM 12, where**

**that policy is interpreted as including an appropriate definition of services, and service areas.**

## **2. Pedestrian and Vehicular Access**

It is of concern that the single access road to Broadwater Road has provision on the plans for "passing spaces". And there is also allowance for a fire engine to drive over the foot/cycle way if needed. (Transport Assessment, Part 1, Section 4.3.2 refers to both points)). This suggests that the capacity for two-way traffic could be limited under some circumstances. What will be the impact, for example, of a Refuse Collection vehicle on other vehicular traffic? The worst case is that other traffic can't get in or out when a refuse collection is made. That may not have been an issue for the previous site user - which will have had more regular flows relating to working hours and probably little activity at evenings and weekends. The reliance on a narrow, single access road seems to be a serious flaw.

Section 4.4 in the Transport Assessment, Part1 addresses the possibility of planning a secondary access route. This was apparently at the request of Hertfordshire County Council (HCC) because of concerns about emergency access in the event that the primary route was blocked. Three possible options were considered:

via Penn Way,

via Broadwater Crescent,

and via Wheat Quarter.

None of these options were deemed possible because all involved access to private land for which the developer did not have access rights.

Section 4.4.1 makes reference to the HCC Highway Design Guide 3rd Edition (2011) and refers to a presumption that 300 dwellings is the limit for serving a development from a single point of access (Design Guide, Section 6.1). However, that Design Guide identifies that 300-dwelling cut-off as:

*"just a starting point and each case should be assessed against local circumstances".*

The restrictions on the width of BioPark Drive are surely a local circumstance that needs consideration?

The HCC Design Guide details road categories that form the "Road Hierarchy" (Section 8). Under the HCC definition, Broadwater Road is classified as a "Main Distributor Road" and the BioPark Drive would be a "Major Access Road". The HCC Design Guide (Section 8.5.1) defines a Major Access Road as:

*"a residential road that serves between 100 and 300 dwellings or equivalent (see the dwelling units table in the Definitions). Two points of access to a higher category road (usually a local distributor) are preferable. If only one access point is provided, the Major Access road must be looped and the connection to the higher category road should be the shortest possible length. The connection should always form the stem of a T-junction with the higher category road."*

Whilst BioPark Drive is a pre-existing road connecting to Broadwater Road, the scope of the proposed development surely requires assessment against the requirements for a new Major Access Road? In the proposed amended usage of the site, the residentially based traffic flow will surely be significantly different from its former industrial based usage. BioPark Drive is not "looped". Additionally, it is not even full width down its length.

I was interested to identify what the normal requirements would be for an access road of the type involved here. I was not able to easily identify a Hertfordshire requirement, but the corresponding County Document for Herefordshire gave some useful information (Highways, Design Guide for New Developments July 2006). That Guide (Section 2.8) characterised a Major Access Road as

*"serving between 100 and 390 dwellings,*

*if is cul-de-sac then max 200 dwellings plus emergency link required*

*Design speed 20mph*

*5.5m carriageway, 6m if possible bus route*

*2m wide foot ways on both side*

*Turning areas in accordance with Section 2.13*

*Visibility splays in accordance with Section 2.12"*

I would be surprised if Hertfordshire's requirements are substantially different. The BioPark carriageway width as proposed is 4.8m wide, with passing spaces at 5.5m wide (which equate to the overall minimum width requirement identified here for Herefordshire). The proposed foot way is 3.1m on one side only for pedestrian and cycle use.

Section 9 of the HCC Design Guide identifies "Permitted Road" connections. Whilst the road connection is already in place, the Hierarchy suggests that normally a Major Access Road is so far below a Main Distributor that a direct connection would not be allowed.

The disparity in the hierarchy, together with the inadequacy of the road width and road design, surely indicate that the proposed access is stretching the limits of acceptability. If permitted, the consequences could be at best frustrating for users, and at worst could

have serious consequences in the case of emergency access being required which is impeded by a road obstruction.

**Objection 2: The proposed Access Road design connection of BioPark Drive to Broadwater Road, and the design of the Main Access Road do not meet Hertfordshire County Council Highway Design Guide requirements.**

### **3. Parking and Visitor Parking**

The Policy objectives to reduce dependence on car usage are highly desirable from environmental and other perspectives. Forcing that reduction by constraining the availability of parking is only an acceptable approach in the eyes of the resident if there is effective availability of alternative transport.

The reality is that bus service provision at evenings and weekends is extremely limited and bus journeys are only viable during a weekday between main locations. Service to smaller locations outside Welwyn Garden City can be non-existent. For example, there is no bus service at any time permitting a return journey *from Welwyn Garden City to Tewin* – there is a single service on three weekdays for shoppers leaving Tewin at 1105 and a single return service at 1345 from Welwyn Garden City. Travelling by car is very straightforward and readily possible 24/7. Most car users would probably be surprised by this example of bus availability.

The train service from Welwyn Garden City to Kings Cross has also been degraded over recent years. There are no longer either “First stop Finsbury Park” services or the corresponding “First stop Welwyn Garden City” return trains. Furthermore, Welwyn Garden City was not included as a direct service when new services were introduced via Thameslink to Gatwick Airport and related destinations. A change of trains is always needed to go to and from destinations such as Gatwick Airport.

There are therefore areas where significant improvements to public transport are needed in order to realistically pursue a policy of reducing reliance on car transport and ownership. And those transport improvements need to come first before the developments that need them.

The proposed provision of car parking is summarised in the Application “Brochure” at page 97. More detail is provided in the Transport Assessment, Part 1 at Section 7.

The proposal is to provide 219 spaces for residential use. Twenty of those spaces are allocated to the residents in the 8 houses (16 spaces) and 4 dwellings in Block F (4 spaces). Twenty-two spaces are allocated for visitor parking, all in the basement garage. The number of spaces to be permanently allocated to residents in Blocks A to E (277 dwellings) is therefore 178, or 64%.

An attempt is made at Section 6.5.1 of the Transport Assessment to use more local data, but that attempt is constrained by the lack of available 2011 Census data at a

suitably local level. I am aware that many residents of the Mirage Estate consider the inadequate provision of parking to be a major issue. It would be appropriate to consult the Mirage residents to establish their level of car ownership, their parking arrangements, their arrangements for visitor parking and the day-to-day issues that give rise to problems. And also to establish what changes and alternative options could encourage them to reduce car ownership and usage. That information could inform assessment of this proposed development because of the likely similarity between the Mirage residents and the prospective Broadwater Gardens residents. The difference between the intended provision and the likely current "real world" requirement could then be much clearer. In turn, that information could inform the realistic changes needed to encourage lower car usage and ownership.

Visits by friends and family have been very substantially reduced by Pandemic Tier restrictions. Under more normal circumstances, the residents would want to entertain visitors who probably, in the majority of cases, will arrive by car and need somewhere to park.

In the Proposed Development, 99 dwellings will not have an allocated space. I am now unable to drive and so no longer own or drive a car. But I do have an allocated parking space in the basement car park, and I make use of that space for visitors and expect to make increasing use of that space in future. I have a fob/electronic door opener for accessing the underground parking. I would have a significant problem if I didn't have that car parking space available for my use. Whilst I do not need that space for a large part of the time, I do need a space to be reliably and readily available at any time of the day or night. A significant number of the prospective Broadwater Gardens residents will be in a similar position to me.

The parking arrangements in Section 7, envisage providing only the 178 permanent parking permit holders with a fob/electronic door opener to gain access to the underground parking. The remaining 121 dwellings, including those in the houses and in Block F, will not have fob/electronic access and so will not be independently able to access the underground parking for Visitors. The proposal in Section 7 is that the allocation of Visitor Parking, which is all located in the basement parking, is controlled by the "on-site management team". The proposed availability of that "team" is not identified but it would be very surprising if it were available 24/7. In order for the visitor parking to be accessible at all times it follows that fob/electronic access is needed and that would need to be arranged for residents who do not have their own parking space in the underground parking. Whilst control of visitor parking spaces is highly desirable, the proposed arrangements look to be overly complicated. It is not clear on what basis the figure of 22 visitor spaces has been identified, but it amounts to only supporting visits to 7.5% of dwellings at the same time.

I thought it could be helpful to make a comparison between this Proposed Development and what was planned and subsequently implemented by Taylor Wimpey for the Mirage Development on the former Roche site adjoining the BioPark. The latter was the subject of Planning Application NA/2010/1776/MA and the associated Design and Access Statement (Document 449692) gives some key details, shown in the Table. The

corresponding information for the Broadwater Gardens Development is shown where available, either collected from the plans or calculated where appropriate.

	Mirage – Roche Site	Broadwater Gardens
Area, Ha	2.8	1.24
Area, Acres	6.92	3.06
Total dwellings	207	289
Site density, Dwellings/Ha	74	233
Type & distribution of dwellings	Block 1 3x 1B flat 7x 2B FOG 16x 3B TH 8x 4B TH	Block A 2x Studio 30x 1B Flat 33x 2B Flat 14x 3B Flat
	Block 2 1x2B FOG (Flat over Garage) 23x 3B TH	Block B 6x Studio 30x !B Flat 24x 2B Flat 7x 3B Flat
	Block 3 36x 1B flat 19x 2B flat	Block C 0x Studio 21x !B Flat 32x 2B Flat 1x 3B Flat
	Block 4 41x 1B flat 53x 2B flat	Block D 3x Studio 27x !B Flat 16x 2B Flat 1x 3B Flat
		Block E 1x Studio 9x !B Flat 18x 2B Flat 1x 3B Flat
		Block F 0x Studio 0x 1B Flat 3x 2B Flat 2x 3B Flat
		Block G 8x 4B TH
Totals by type		
Studio	0	12

1B Flat	80	117
2B Flat	80	126
3B Flat		26
3B TH	39	
4B TH	8	8
Total dwellings	207	289
Total habitable rooms	643	768
Parking		
Resident spaces	223	219
Visitor Spaces	25	22

It can be seen that the Broadwater Gardens site is substantially smaller than Mirage – 44% of the size. More dwellings are proposed for Broadwater Gardens giving over three times the density in Dwellings per Hectare. Mirage has two, full width access road connections to Broadwater Road and users can access any property by either route. Whereas Broadwater Gardens has a single access road with limitations, as discussed above.

The provision of resident parking for Mirage is a mixture of surface and under building parking. The number of spaces provided (223) is slightly more than the total number of dwellings (207). I have not investigated visitor parking but it does not seem to be readily available. From neighbour representations already posted on the website in response to this Application, it is clear that parking is of major concern to Mirage residents. Unauthorised, users are reported as parking in the area.

The proposed resident parking provision for Broadwater Gardens at 219 spaces for 289 dwellings is substantially less than that at Mirage. This will create a major problem for the new residents, and it will undoubtedly have a negative impact on the surrounding area to the detriment of the existing community.

It would seem that the underground parking capacity available is fixed by the site excavations that are possible. It is not clear if extension of the level 2 basement parking is possible or desirable.

**Objection 3. The Application proposes a housing density that is substantially greater than that in the surrounding area. The proposed parking provision is seriously inadequate when assessed in the context of that already provided locally which is itself deemed to be inadequate.**

#### **4. Building height issues**

Early public responses to this Planning Application show that this is an aspect of widespread concern. The Broadwater Road West Supplementary Planning Document, adopted December 2008 has been cited with respect to this issue. That planning document was developed from a significant activity that assessed a wide range of issues and relevant policies. The activity developed a Masterplan Framework from which a set of Design Guidance was generated. Building height was one aspect of that Design Guidance (Sections 6.15 to 6.17). That Guidance gives prominence to the two listed buildings - the CPUK Silos and the Roche reception building: "

*"should be incorporated as landmarks in the overall structure of development and the building heights of all blocks should have regard to the setting of these buildings. The silos, in particular, should stand out as the main landmark on the skyline and therefore no new development should adversely affect this role".(Section 6.15)*

The Guidance goes on to address building heights across the site

*"lower rise buildings should generally be accommodated at the southern end of the site, responding to the adjacent residential character areas that the development will need to respect. Medium rise buildings should make up the site, particularly through the central band..." (Section 6.16)*

The Guidance makes more specific reference to building heights

*"it is generally considered to be that the buildings should not be more than five storeys in height." (Section 6.17 )*

But it does not preclude consideration of taller buildings

*"where new build development on the site is proposing development of 5 storeys (or more) the resulting scheme will be assessed with regards to both the contribution that such height could bring and any adverse impacts." (Section 6.17)*

The Guidance goes on to identify assessment criteria for any proposed scheme, including

*"Effect on the local environment and amenity of those in the vicinity of the building." (Section 6.17)*

The Design Guidance as the output from the Supplementary Planning activity for Broadwater Road West should therefore reasonably be taken as the starting point for consideration of any proposal. WHBC went to considerable effort to develop and approve the Supplementary Planning document and it should not be disregarded without very good reason. In particular, that Document was developed in the context of the historical development of Welwyn Garden City with its important significance in Sir Ebenezer Howard's Garden City Movement. That significance is unchanged since approval of the Document in 2008 and so it is not acceptable to argue that the Guidance therein is significantly out of date.

It should be noted that reference to the "lower rise buildings" and the "southern end of the site" in the Design Guidance was regarding the area immediately north of the BioPark site, because the BioPark was assumed to be remaining. The development area in question is therefore further south than envisaged by the Design Guidance. The clear emphasis was on lower rise buildings in that southern part of the site, with medium rise towards the centre.

The current proposed development is therefore a long way removed from what was envisaged in the Supplementary Planning document. And whatever is proposed needs to be assessed on "effect on local environment and amenity of those in the vicinity". Local resident concerns about, for example, invasion of privacy from the proposed high-rise buildings need to be seen in that context.

The development proposal addresses the impact of the buildings on the local environment in the:

*Environment Statement, Volume 1 at Section 8 - "Heritage, Townscape and Visual Impact Assessment".*

That section has been contributed by Bidwells. At Section 8.2.6 the document refers to a formal "Scoping Opinion" that was not sought by the developers but was sought by WHBC; however, the text of Section 8.2.6 is clearly incomplete. Section 8.2.7 includes a quote from that Opinion indicating that the Development would have significant local impact:

*"The development within the local context is transitioning from being an employment area, with an industrial characteristic, to a more residential urban area. Whilst it is noted that the proposed development would not be taller than the existing property, this development would introduce tall residential flatted buildings, within an area where most buildings, in particular residential, are smaller in height. The development is therefore deemed to be significant in physical scale with regard to buildings within the local context, namely those of a similar use, thus being residential. The development is therefore likely to give rise to significant visual effect on the local environment in terms of townscape and local character; and result in a marked intensification of the site in a residential characteristics, leading to significant environment effects, including traffic and air quality."*

And at 8.2.8:

*"The Screening Opinion went on to state:*

*"The increase in scale, namely with height, may also result in a significant effect upon heritage assets and the townscape."*

Section 8.2.9 *et seq* refer to discussions with WHBC and Historic England to identify the impact assessment needed. The Section goes to some considerable length to describe an Evaluation Methodology and its application to the proposed development.

The assessment includes at Section 8.4 (Inherent Design Mitigation) a discussion as to how the proposed design seeks to mitigate any adverse effects that could arise when viewed from different observation points. This is done at some length and the meaning of some of the observations is not always immediately obvious. For example:

*"A change in materiality provides further articulation and visual interest as well as signposting a sense of differentiation to the industrial quarter and alleviating any sense of pastiche."* (Section 8.4.4)

The conclusion reached at Section 8.7.16 generated by use of the methodology was that

*"the effects found in the assessment as a result of the Project are largely expected to be either neutral or beneficial for the surrounding heritage, townscape and visual receptors."*

The methodology proposed and used seems to have endeavoured to convert subjective assessments into a more objective based approach. The implication is that the objective based approach, and its conclusion, therefore has more validity. However, In my view, the text at Section 8.6.63 provides an important focal point for getting to the heart of the issue:

*"The existing building's overall historic value is therefore considered to be nil. Given their relative height and proximity to the railway, they do however possess a high visibility within the surroundings, including from within the conservation area to the west and from the crossings over the railway to the north and south".*

This observation has validity and is also in line with the Screening Opinion already cited. The buildings currently on the BioPark site have little merit. But, because of their height they are highly visible from the locations identified. The proposed development is of comparable height to the existing BioPark building, will have a larger footprint, and will have greater visual impact. The Proposed Development will also therefore have high visibility from the conservation area and from the crossing over the railway to the north and south. I think that there is a strong case for arguing that the visibility and impact needs to be reduced and that the proposed development is three to four storeys too high.

**Objection 4: The proposed development is substantially non-compliant with the Design Guidance developed in the Broadwater Road West Supplementary Planning document.**

## **5. Viability of Access to and use of Car park**

The Design and Access Statement document places the proposed development in the context of the rest of the Broadwater Road West site - showing what exists, what will be removed, what is planned and what is under construction. That Section includes some

photographs that may give a somewhat distorted view of space resulting from taking position and the equipment used. (Notably photograph 5 on page 15).

It can be difficult for the lay person to assess the photos and plans provided without having had physical access to the site. One aspect of possible concern is access into and out of the underground parking and manoeuvring within the car park. From my albeit limited experience of parking at Salvisberg Court, the shutter at the entry point takes time to rise and vehicles may need to wait before proceeding. The ramp has a fairly shallow slope and is relatively wide at the point compared with a vehicle width. There is a need to make a right-angle turn on entry/exit. Collectively, these factors mean that the access ramp is only suitable for use in one direction at a time. This is not a problem because drivers are relatively close and easily seen and those wanting to enter and exit in a similar time frame can do so without undue problems. It can be difficult to park a large car in the space provided, particularly if adjacent spaces are occupied. The capacity of the car park and its layout in different sections means that a car that is being parked rarely impacts the movement of another vehicle.

In the Broadwater Gardens proposed development:

- It is not clear from the information provided that the external road space available and the single access ramp proposed for use by all traffic will allow unimpeded traffic flows into and out of the car park. Is two-way traffic supported?
- The vehicle height and width restrictions do not seem to be provided.
- The access ramp from the outside to basement level 1 is aligned such that it runs parallel to, but offset from, the ramp between basement level 1 and 2. This means that a vehicle entering or leaving the level 2 parking needs to make a 180 degree turn at level 1 to access the next ramp (see Block A & B Basement L01 Plan 010). It looks that a turning car will need the entire road space, ie. clear of any other level 1 or 2 traffic. What happens, if another car that will have been unsighted and coming in the other direction, is already on the next ramp?
- Whilst there is some segmentation of parking areas in the layout, there are also points at which traffic could be delayed by a driver needing to make a number of manoeuvres to park.

The historic use of the underground parking is of limited relevance because as a “work” car park the traffic will have been substantially unidirectional. There was also significant, alternative surface parking available which will no longer be the case with the proposed development. The viability of the parking space needs to be confirmed. Major problems could reduce the available parking provision.

**Objection 5: it is not clear from the information provided that the re-use and extension of the existing basement parking will be free of significant issues that could impact the suitability of the parking.**

## **6. Delivering the vision generated in Broadwater West Supplementary Planning Document"**

At some stage the Distribution Site north of Broadwater Park is clearly intended to be included in the overall development. That is to be welcomed. That Distribution activity does not fit within the site as currently developed. The activity generates early morning noise (a sequence of lorry reversing alarms sounding from 0530 am onwards on weekdays) and is visually unappealing. There is also a low probability issue that the activity could potentially present a major hazard to the residential area if there were a significant accident during operations - depending on the Goods involved and how they are handled.

An overall concern with the Broadwater Gardens proposal is that it is not clear how it fits in with the rest of the Broadwater Road West development. There is a danger that it, and the other existing completed developments and those under construction in different parts of the site, emerge as a patchwork of separate developments with limited integration into a cohesive whole. This is a particular issue for Broadwater Park because of the constrained nature of the site and its restricted access.

The servicing of the BioPark site could be improved significantly if a dedicated "services only" access road could be incorporated between the proposed buildings and the railway. That access road would need to link in with a road in the rest of the development to the north. Services could be defined as the range of activities requiring specific, short term access: delivery of post, on-line food deliveries, parcel deliveries ("white van"), refuse collection, taxi drop-off and pick-up, and those with professional and other service appointments with residents. The visit times envisaged could be in the range of ten minutes to one hour.

**Objection 6: The piecemeal nature of the development precludes the generation of the optimum outcome for the use of the site.**

### **Conclusion**

This is a complex Application and it is difficult for the lay person to assess and comprehend the detail of everything that is proposed. I have taken some time to identify what appear to me to be some significant issues, to relate those to identified planning requirements, and to highlight issues for the existing neighbourhood and the wider community. I hope that this will be taken as a constructive input to the planning process.

My conclusion is that the proposed development is too large in the constrained space available. A different proposal is needed - one which has better integration with the overall Broadwater Road West development. Approval of the development as currently constituted would give serious cause for concern.

*Note: I have some supplementary comments, and these are included in the Appendix.*



## **Appendix**

### **“Broadwater Gardens”**

#### **Public Consultation – Supplementary Points**

##### **A1. Proposed Floor Plans**

I have looked at the detailed proposed floor plans and I have a few comments based on my interpretation of what is intended.

The floor plans for Blocks A and B for floors 1 to 5 show some unusual front door access arrangements (3000 AB-GA-P-L01-L05 PL). Please see the two pairs of flats A109/A110 and B108/B109. Each pair of flats is accessed from a "Deck Area" which in turn is accessed from the corridor serving the other flat entrances on that floor (Seven entrances in Block C and eight for Block B.) The result is that to enter Flat A110 the person has to pass the bedroom window of Flat A109. Similarly, Flat B109 is entered by passing the bedroom window of Flat B108. That arrangement looks highly undesirable, particularly for the residents of the ten flats A109 and B108. (Two flats on each of five floors)

Lift Access on Ground Floor of Block D (3000 CD-GA-P-L00 PL). To access the lifts as proposed requires all users to go through the Entrance lobby and through a door into the Ground Floor Access Corridor. Wouldn't it be preferable to access the lifts directly from the Entrance Lobby? That would require "double-doored" lifts. The lift door location is not identified on the other floors of Block D but can only be onto the access corridor; those lift door accesses would be on the opposite side from that suggested here for the Ground Floor. (Lift access doors are marked on the different floors in the Plans for other blocks.)

##### **A2. Comment Environmental Statement Volume 1, main text**

Section 7.4 Baseline Conditions. These are not as described.

7.4.3 I would not class the Broadwater Road footways as "High Quality". The surface of the west side footway is badly degraded by repairs following civil works. After or during rainfall the drainage is inadequate, or not suitably maintained, such that large puddles form in the road with the result that passing traffic then showers a pedestrian caught in the wrong place. This issue is particularly bad on the east side near the Pedestrian Crossing adjacent to Otto Road. A large volume of water collects which passing traffic displaces and which would drench any pedestrian who happened to be in the wrong place. Further, a large puddle forms at the dropped kerb at north side of Broadwater Road at the junction of Hyde Way (Station access - west side) making it unusable for some time after rainfall. Additionally, between that point and the Bridge Road junction,

the shrubs at the boundary have not been cut back for a long time and the growth significantly impacts on the useable width of the foot way. The measured vehicle speed of 29 mph at 85%tile (Transport Assessment Part 1, section 3.7.3 and 3.7.4) makes walking close to the traffic unpleasant. The eventual provision of alternative walking routes is therefore to be welcomed.

Para 7.4.4 refers to the provision of high-quality cycle routes. The route on the East side of Broadwater Road does not have a demarcation between pedestrian and cycle use. And it is unclear where the cycle route goes between Hyde Way and Bridge Road - potentially over the currently constrained width of footway. I recognise that these comments result perhaps from resource constraints on maintenance and are peripheral mostly to the Application. I also accept the very high desirability of separating motor and cycle traffic. However, I have a serious issue that the foot way on the West side of Broadwater Road is routinely, and I would assume illegally, used by bicycle traffic (including electric scooters) riding in both directions. That is an activity that will be promoted by additional cycle traffic leaving BioPark Drive. If going north, the cyclist will be tempted to simply turn left and ride on the West Side foot way. That presents a very significant hazard to pedestrians. These issues could be significantly avoided by the enforced use of demarcated footways.

With respect to Section 7.4.7, the bus stops at Bridge Road near the Broadwater Road junction have both been taken out of service following the introduction of a separate cycle lane on the road across the bridge. It is a pity that the bus Stop in the "out of town" direction has been decommissioned because a number of routes divide after that point. A person wanting to go to the QE2 hospital, for example, used to be able to have the flexibility of taking services going by different routes. Removal of the bus stop makes that choice no longer possible.

*There is a general point from the above: facilities can only be used to give their full value if they are maintained, used in the way intended, and not arbitrarily withdrawn to meet another need however worthwhile.*