

To: Mr David Elmore, WHBC Planning Case Officer

Subject: Objection to Planning Application 6/2020/3420/MAJ - BioPark Broadwater Road Welwyn Garden City, AL7 3AX,

Dear Mr Elmore,

I strongly object to application 6/2020/3420/MAJ for the development of the BioPark site, Broadwater Road and I urge the Council to refuse planning permission on the following grounds:

1. The application would result in an incongruous overdevelopment of the site.
2. The application is breach of the Council's 'Broadwater Road West Supplementary Planning Document 2008'
3. The application is in breach of Policy H6 of the District Plan
4. There are insufficient 3- and 4-bed dwellings suitable for families. As such, it does not meet WHBC's own housing needs assessment. As there appears to be no social or 'affordable' housing in the development, it also contravenes the agreed WHBC policy of a minimum of 15% social housing in new developments.
5. The application proposes no new infrastructure for its new residents such as indoor or outdoor sports facilities, schools or GP surgeries. This will mean that the new residents will be competing with existing residents for the use of these existing facilities.

This application would result in an incongruous overdevelopment of the site, have a detrimental impact on the amenity of neighbouring areas, fail to meet quality standards for space and amenities and have a detrimental impact on traffic and parking.

According to the information supplied by the developer, there would be 289 dwellings for 852 people in an area of only 1.24ha. It is shocking to realise that housing 852 people in only 1.24 ha results in a population density of 687 persons/ha. To put this into perspective: the most densely populated area of central London is Islington, with a population density of 160 persons/ha; Manhattan has 275 persons/ha; and Mumbai (one of the most densely populated cities on earth) has 530 persons/ha.

The application is in breach of the Council's 'Broadwater Road West Supplementary Planning Document 2008', in terms of building heights and housing density. The developer's proposals do not satisfy the required criteria as mentioned in section 6.17 for building higher than 5 storeys, specifically, the effect on the local environment and amenity of those in the vicinity of the building; the relationship to the context of the site and its wider surroundings; and the effect on the historic context of the site and the wider area. The amenity and privacy of people living in the houses nearby will be seriously disadvantaged by the residential units proposed being higher than 5 floors.

The development would be clearly visible from the west side Conservation Area, as well as from Hatfield House. It will compromise the Broadwater Road street scene, overpowering the art deco and Mirage developments to the south. It is inappropriate for a Garden City due to its large scale, high density of homes and minimal greenery. It has no kinship with our unique town.

The application is in breach of Policy H6 of the District Plan which only allows for densities in excess of 50 dwellings per hectare in central areas and in areas with good accessibility, provided that the development does not have an adverse impact on the character of the surrounding area and complies with other design policies of the Plan. The developer proposes building 289 dwellings on this 1.24ha site, which equates to 233 dwellings per ha. It is clear that cramming 233 dwellings per ha into this site, with little or no investment in the necessary schooling, medical, welfare and outdoor recreational facilities will have a major deleterious effect on the surrounding area and the amenities enjoyed by existing residents.

It is unreasonable for the developer to seek to bring in 852 new inhabitants into a town like Welwyn Garden City and yet to make no provision for their wider, long-term needs & welfare by supporting the provision of

key infrastructure. Lastly, this area has very poor accessibility for a housing estate: the only access is via BioPark Drive and once this cul-de-sac has been provided with pavements wide enough for safe access for all inhabitants of the estate, the remaining road-width of BioPark Drive will only be suitable for one-way traffic – which is clearly unacceptable & impossible – or be dangerously congested with two-way traffic.

In the UK, we have experience of congested housing estates and we know that this level of population density will be detrimental to the health & safety of the future inhabitants. I urge you to study the terrible failures of similarly over-developed estates in the past, such as the Broadwater Farm, Chalkhill & Aylesbury Estates in London and Billyfields in Wales. There are many more such examples and the policy of building such estates has generally been abandoned in the U.K. In fact such estates are being torn down and replaced with lower density housing.

This proposal will result in an over-populated estate, with wholly insufficient external recreational space for the hundreds of planned residents, very restricted road access, insufficient facilities and will provide no additional services for schooling or medical facilities. Already school places and GP capacity for existing residents are wholly inadequate. History shows that such overcrowding leads to anti-social behaviour and other environmental & societal problems. The Covid-19 pandemic has placed a bigger importance on having sufficient outside space but the developer is providing little usable outdoor public space.

The development contradicts WHBC's own vision for Broadwater Road west which was to integrate the spirit of the Garden City with the very best of 21st century design. There is nothing of the Garden City spirit here with its 9- storey buildings, let alone any architectural vernacular or design detail that reflects it. The suggestion of creating green roofs/roof gardens is wholly disingenuous;- no-one except a passing helicopter or drone will ever see them, and children of families trapped in this high-rise nightmare will in any Case never be allowed by their parents to freely play in a roof-garden at a height of 100 feet!

The mix of dwellings is excessively skewed towards one- and two-bedroom dwellings ,with very few dwellings for larger families, despite this being the size of dwelling for which there is the most need in the WHBC area. As such, does not meet WHBC's own housing needs assessment. As there appears to be no social or 'affordable' housing in the development it also contravenes the agreed WHBC policy of a minimum of 15% social housing. How can the development attract growing families when there are so few 3-bed or 4-bed units? Instead it will encourage a rather 'transient' singles/couple community that will be forced to move out of the estate if they start a family.

This development offers only 216 parking spaces for 289 homes. There is no example where a development without adequate car parking has worked. Other sites within the Borough, such as villages with high public transport accessibility, appear to have been ignored despite their suitability for development. For example, Brookmans Park, Cuffley and Northaw. It is understood that two members of the Council's Development Committee live in Brookmans Park, whose suitability for development was also found by the Housing Inspector.

Please reconsider these and do not place such a disproportionate amount of all your borough-wide housing growth requirements into such a relatively small site (ie. Biopark, plus Wheat Quarter plus Southside) within a single Ward of WGC, and create an appalling and lasting legacy that cynically ignores the ideals of the founders of the Garden City in pursuit of developer profits.

I strongly urge the Council to refuse this application.

Yours sincerely


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