Broadwater Gardens, Welwyn Garden City

Architectural Rebuttal, prepared by Simon Camp

Alan Camp Architects LLP
88 Union Street, London, SE1 0NW. t: 020 7593 1000 e: mail@alancamp.com

Date: June 2022

For further information please contact:
Partner: Simon Camp, simon.camp@alancamp.com
Alan Camp Architects LLP
www.alancamp.com

REBUTTAL STATEMENT

1. I have prepared this rebuttal to respond to comments on urban design and density in the proof of evidence of:
   - Mette McLarney acting for WHBC
   - Tim Parton acting for Keeping the G in WGC
   - Richmond Bauer acting for Welwyn Garden City Society.
   - Professor Susan Parham acting for Welwyn Garden City Society.

2. In this rebuttal I respond to a number of matters. The fact respond to some aspects and not others within the proof of evidences, should not be taken as my agreement to it. In this rebuttal I merely focus on matters which I consider call for a response at this stage. I have tried to address these aspects by subject to avoid as much replication as possible.

3. I confirm that the views expressed here are my own considered professional opinions.

Signed

Dated: 27 June 2022

1. DENSITY

1.1 Within Ms Mette McLarney's proof of evidence paragraph 4.3 states that *'the proposed density of 233 dph far exceeds the density guidance of 75 dph'* set out in the Broadwater Road West SPD 2008. Whilst this is a 14 year old guidance within the SPD, if you examine the sites that have come forward within the area since its publication only one site (Roche Factory site) complies with this dph guidance. The Roche factory site was approved in 2010 (N6/2010/1776/MA) all other schemes were approved with densities that exceeds 75 dph.

1.2 Mr Tim Parton makes a similar reference to density within his proof (Par 6.18) referring to WHDP policy H6 requiring new development to be built at a density of 30 to 50 dph. Table 1 adjoining provides the densities of approved schemes within the Broadwater area dating back to 2008. The table shows that since 2018 several schemes have exceeded the SPD density figure. Indeed WHBC are happy to recommend higher density figures for the site by increasing their recommendation for capacity as they look to preserve the important greenbelt surrounding Welwyn Garden City by providing housing on suitable brownfield sites, see table 2.

1.3 Table 1 below shows some of these approvals:

Site	Approval date	Density / Homes
Broadwater SPD	2008	75 dph
Roche Factory Site	2010	75 dph
45 Broadwater Road	2018	104 unit care home calc at 136 dph
Shredded Wheat	2018	201 dph 1,340 homes
37 Broadwater Road	2019	120 dph 24 homes
29 Broadwater Road	2021	82 dph 128 homes
BioPark	2021* submission	233 dph 289 homes

Table 1 , Broadwater SPD consents

1.4 It is important to consider the history of the council's aspirations for the site since 2008. Mr Mark Westcott has provided a detailed analysis of the site's change of use from employment to residential. In January 2020 WHBC (**CD F.24** Page 6) assessed the BioPark site to provide additional 179 residential housing on this brownfield site

1.4 for the town. Subsequently in April 2020 this was increased to 250 residential homes. Both of these figures exceed the guidance of 75 dph in the Broadwater Road SPD. See the table 2 below for comparison.

Site	Approval date	Density / Homes
Broadwater SPD	2008	75 dph
Council Objectively Assessed Need	Jan 2020	144 dph 179 homes
Council Objectively Assessed Need	April 2020	202 dph 250 homes

Table 2 , council density for BioPark

Jan 2020 OAN ref: **CD F.24** pg 26 & **CD B.11** Page 196,

April 2020 OAN ref: **CD F.24** pg 26 para vii & xi

1.5 The developer of the Wheat Quarter has recently submitted further applications to increase the number of dwellings on the site. According to Cllr Russ Platt's post on the Keep the G in WGC this currently stands at 1,454 homes (218 dph) and will increase to 2,149 homes (322 dph). The Wheat Quarter consent demonstrates that WHBC are willing to accept higher density schemes within this part of the town.

1.6 Mr Richmond Bauer states in paragraph 9 that 'the predicted population of the site will be 852 people giving a density of 687 / hectare. Later in his proof paragraph 25, he describes how Ebenezer Howard mentions a density of 158 / hectare. He then compares the site density, before comparing the site density with the wider densities of New York City and Islington in paragraph 26. In table 3, I have fact checked these figures and how Welwyn Garden City has evolved over the years from the original vision to today's population. I have also included the BioPark scheme density in the table for comparison.

1.7 Density is commonly measured in either dwellings per hectare or by habitable rooms per hectare. Having looked at the comparisons used by Mr Richmond Bauer he has compared the human density of a single site to that of a wider area in New York or Islington,London. When using data from the UK Office for National Statistics (web) these can be further interrogated with both population and the site area of the town, shown in table 3.

1.8 Table 3 below shows how Welwyn Garden City's population has evolved since Ebenezer Howard's first vision 124 years ago to the latest ONS estimate in 2020:

Ebenezer Howard's original vision:

Site Area:	962 Ha
Maximum capacity:	50,000 people
Density people/Ha:	52

1948 Welwyn Garden City:

Site Area:	1,747 Ha*
Census:	18,200 people*
Density people/Ha:	10.4

Still with maximum vision of 50,000 people which would give a density of 28.6 people/ Ha. *from tcpa website

2001 Welwyn Garden City:

Site Area:	1,747 Ha
Census:	43,000 people
Density people/Ha:	24.6

2020 Welwyn Garden City:

Site Area:	1,390 Ha
ONS estimate:	51,248 people
Density people/Ha:	36.87

Table 3 , increase in population within Welwyn Garden City

1.9 Taking the ONS data from 2020 they estimate an annual population change of 0.62%. If this population change was added to the ONS data the 2022 population of Welwyn Garden City would increase to 51,885, adding the additional occupancy for BioPark (852) would increase this to a total of 52,737 people. Table 4 shows how this directly impacts the density per hectare calculations:

2022 Welwyn Garden City:

Site Area:	1,390 Ha
Estimate:	51,885 people
Density people/Ha:	37.3

2022 Welwyn Garden City + BioPark:

Site Area:	1,390 Ha
Estimate:	52,737 people
Density people/Ha:	37.9

Table 4 , Current population within Welwyn Garden City with and without the BioPark scheme

1.10 Whilst the town has increase in area over the years if the original site area (962 Ha) of Ebenezer Howard's original vision this would provide a density of 54.8 people per Ha. for Welwyn Garden City.

2. OUTDOOR SPACE

1.11 When comparing this with similar data for Islington, 167 people per Hectare, or 108.8 people per Hectare in New York. The data shows that we are significantly less than these two areas. I have attached the references for this data to the appendix of this rebuttal.

1.12 There are inconsistencies with the assumptions made within Mr Richmond Bauer's density calculations and the way they have been applied for comparisons in paragraph 26. The figures prove that the density in terms of the population is relatively close to Ebenezer Howard's Garden City vision.

2.1 Mr Richmond Bauer made reference to the lighting levels (paragraph 13) within the amenity space and tabled a massing model (appendix C) to demonstrate the light levels within the amenity space. As part of the planning application Anstey Horne provided a full sunlight assessment using a geo-located computer model (**CD C.14** page 15 paragraphs 6.24 &6.25) to test the amenity spaces. The guidance is to ensure that a minimum 50% proportion of the amenity space receives 2hrs minimum light. The ground floor amenity space out performs the roof terraces to provide a minimum of 82.46% with the worst performing roof terrace achieving 67.24%. Therefore, the scheme exceeds the minimum requirements for the amount of light they should receive and will be used as enjoyable play space.

2.2 The amenity standards for the dwellings comply with the minimum standards that are mentioned in Mr Richmond Bauer's paragraph 15. The scheme is complimented for its amenity space by the council's urban design officer as mentioned in my proof of evidence.

3. CHARACTER

2.3 The roof spaces are a safe and enjoyable space to dwell. Balustrades to all private balconies, terraces and communal roof terraces are a compliant minimum 1100mm from the finish floor level. On the communal roof terrace between cores A & B the parapet was raised further to 1300mm.

3.1 Professor Susan Parham introduces into her proof of evidence (paragraph 61) that '*the materials that are proposed are not sympathetic to an otherwise coherent materials palette used in existing parts of Welwyn: wooden windows, brick walls, and tiled roofs'*. The materials that we have proposed were directly selected with great care to be part of the palette we selected a red brick for the walls, white bricks to pick up on the rendered art deco buildings and clay tiles for the mansards. We also selected metal framed windows which are used on the Roche factory scheme adjacent to the site. Therefore, I believe that we have been sympathetic with the materials.

3.2 Professor Susan Parham in paragraph 67 states that there is a lack of provision of food space. We have provided an orchard with edible fruits as part of the Garden City principle which was missing from other approved schemes within the SPD.

4. HEIGHT

4.1 All the proofs mentioned in paragraph 1 raise the issue of height and the provision of low rise housing. The existing building is taller than this typology and could be considered that it would not be appropriately utilising a brownfield site. The Shredded Wheat quarter is currently under construction and there are already 8 storey flatted blocks fronting onto the Roche factory site, which does elevate the existing context beyond the references made.

4.2 As mentioned in 1.4, I refer to the council's proposed site allocation being set at 250 dwellings. To achieve this with the same footprint to the proposed scheme would mean the loss of a single typical floor for cores A-E. WHBC on assessing the housing need allocation would have appreciated that the only way to achieve 250 dwellings with the required landscaping would be to go higher than 5 storeys with a flatted proposal, as set by the precedent at Shredded Wheat. The council would have looked at the BioPark site as an opportunity to optimise the residential potential within this brownfield site and to preserve Ebenezer Howard's vision of the town being surrounded by countryside rather than losing a significant amount of land.

APPENDIX

A.1 Welwyn Garden City Data

A.2 Islington Data

A.3 New York City Data

A.1 WELWYN GARDEN CITY DATA

WELWYN GARDEN CITY

in Hertfordshire (East of England)

Built-up Area Subdivision

The population development of Welwyn Garden City as well as related information and services (weather, Wikipedia, Google, images).

Name	County / District	Population Census 2001-04-29	Population Census 2011-03-27	Population Estimate 2020-06-30
Welwyn Garden City	Hertfordshire	45,660	48,380	51,248

Welwyn Garden City

51,248 Population [2020] – *Estimate*

13.90 km² Area

3,686/km² Population Density [2020]

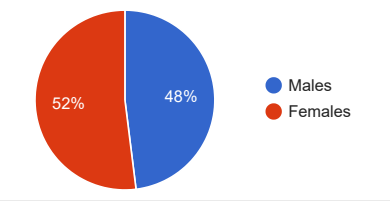
0.62% Annual Population Change [2011 → 2020]

Welwyn Garden City: garden city and new town in Hertfordshire, England – Local dialing code: 01707 – Postal code: AL7, AL8

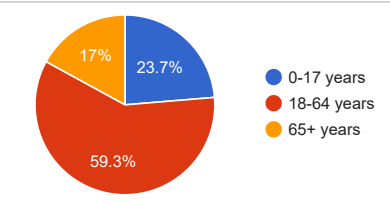
Source: UK Office for National Statistics (web).

Explanation: All population figures and depicted boundaries are based on output areas officially assigned to the 2011 built-up areas. Output areas often include some unbuilt parts. However, tabulated area figures refer to (typically smaller) actual built-up areas in order to present a more realistic population density. Some of the 2001 figures are approximate values.

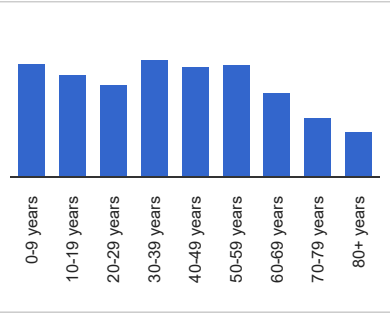
Further information about the population structure:



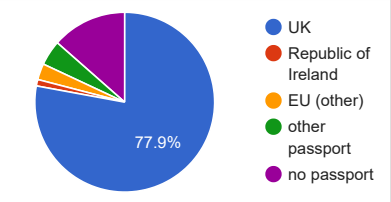
Gender (E 2020)	
Males	24,611
Females	26,637



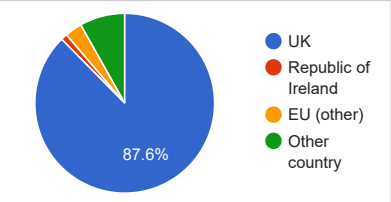
Age Groups (E 2020)	
0-17 years	12,135
18-64 years	30,378
65+ years	8,735



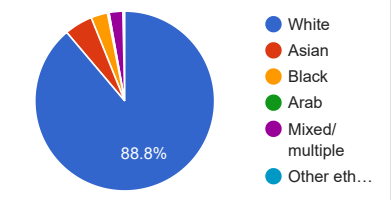
Age Distribution (E 2020)	
0-9 years	6,990
10-19 years	6,279
20-29 years	5,712
30-39 years	7,195
40-49 years	6,797
50-59 years	6,898
60-69 years	5,173
70-79 years	3,688
80+ years	2,795



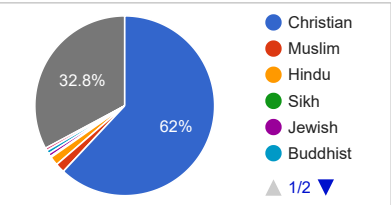
Passport (C 2011)	
UK	38,287
Republic of Ireland	570
EU (other)	1,426
other passport	2,225
no passport	6,641



Country of Birth (C 2011)	
UK	42,389
Republic of Ireland	553
EU (other)	1,494
Other country	3,944



Ethnic Group (C 2011)	
White	42,974
Asian	2,456
Black	1,449
Arab	146
Mixed/multiple	1,191
Other ethnic group	164



Religion (C 2011)	
Christian	27,799
Muslim	758
Hindu	719
Sikh	91
Jewish	258
Buddhist	283
Other religion	222
No religion	14,723

Image © CC BY-SA 3.0

Located in:

→ **Hertfordshire county**

→ **London agglomeration**

Related to:

→ **Datchworth parish**
→ **Hatfield parish**
→ **Tewin parish**
→ **Welwyn parish**
→ **Welwyn Hatfield unparished area**

A.2 ISLINGTON DATA

ISLINGTON

Borough in Greater London

Population

The population development of Islington as well as related information and services (Wikipedia, Google, images).

Name	Status	Population Estimate 1981-06-30	Population Estimate 1991-06-30	Population Estimate 2001-06-30	Population Estimate 2011-06-30	Population Estimate 2020-06-30
Islington	Borough	165,400	171,800	179,400	206,285	248,115

Islington

248,115 Population [2020] – *Estimate*

14.86 km² Area

16,697/km² Population Density [2020]

2.1% Annual Population Change [2011 → 2020]

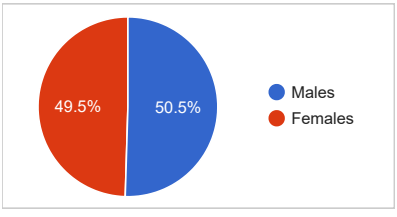
London Borough of Islington: London borough in Inner London, England – Inception: 1965 – Official Website – Local dialing code: 020 – Postal code: EC (+)

Greater London	**Administrative Area**	**6,805,000**	**6,829,300**	**7,322,400**	**8,204,407**	**9,002,488**

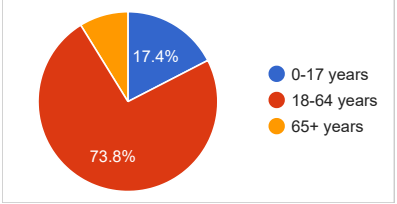
Source: UK Office for National Statistics. (web).

Image © Public domain

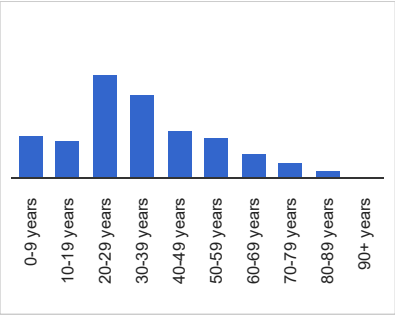
Further information about the population structure:



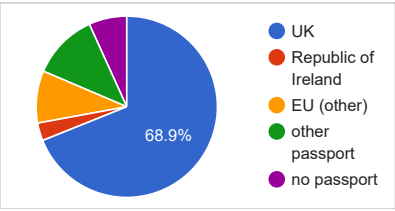
Gender (E 2020)	
Males	125,239
Females	122,876



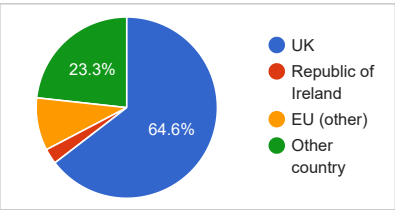
Age Groups (E 2020)	
0-17 years	43,232
18-64 years	183,039
65+ years	21,844



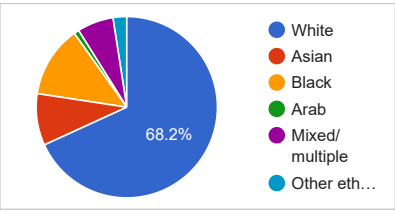
Age Distribution (E 2020)	
0-9 years	25,619
10-19 years	23,183
20-29 years	63,416
30-39 years	51,163
40-49 years	29,320
50-59 years	24,753
60-69 years	15,401
70-79 years	9,748
80-89 years	4,515
90+ years	997



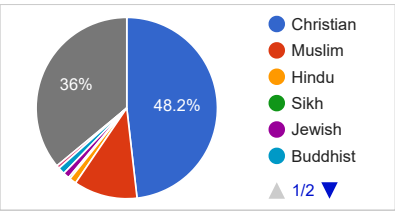
Passport (C 2011)	
UK	147,787
Republic of Ireland	6,816
EU (other)	19,967
other passport	25,309
no passport	14,542



Country of Birth (C 2011)	
UK	133,095
Republic of Ireland	5,679
EU (other)	19,382
Other country	47,969



Ethnic Group (C 2011)	
White	140,515
Asian	19,034
Black	26,294
Arab	1,893
Mixed/multiple	13,339
Other ethnic group	5,050



Religion (C 2011)	
Christian	82,879
Muslim	19,521
Hindu	2,108
Sikh	569
Jewish	1,915
Buddhist	2,117
Other religion	967
No religion	61,911

2021-06-30	WWW.CITYPOPULATION.DE

A.3 NEW YORK CITY DATA

Name	Status	Adm.	Population Census (C) 1990-04-01	Population Census (C) 2000-04-01	Population Census (C) 2010-04-01	Population Census (C) 2020-04-01	Population Estimate (E) 2021-07-01
Montgomery	City	AL	190,563	201,694	205,488	200,567	198,665
Moreno Valley	City	CA	118,717	142,634	193,330	208,865	211,600
Murfreesboro	City	TN	48,303	73,533	109,100	152,437	157,519
Murrieta	City	CA	22,524	51,256	103,726	111,050	112,991
Nampa	City	ID	33,512	54,993	81,892	100,252	106,186
Naperville	City	IL	87,320	128,396	142,175	149,427	149,104
Nashville (- Davidson)	UGov	TN	490,134	547,877	603,465	689,504	678,851
Newark	City	NJ	275,225	272,499	276,941	310,876	307,220
New Bedford	City	MA	98,475	93,847	95,063	101,044	100,941
New Haven	City	CT	130,159	123,928	129,864	133,924	135,081
New Orleans	City	LA	496,938	484,692	343,828	383,997	376,971
Newport News	City	VA	171,477	180,272	180,956	186,247	184,587
New York	City	NY	7,322,564	8,009,185	8,174,930	8,804,190	8,467,513

New York

City in New York

8,467,513 Population [2021] – *official estimate*

778 km² Area

10,881/km² Population Density [2021]

0.31% Annual Population Change [2010 → 2021]

New York City: largest city in the United States – Inception: 1624 – Elevation: 11 m – Official Website – Local dialing code: 212 (+) – Postal code: 10000–10499 (+) – Licence plate code: NY – Near waters: Hudson River, East River, Bronx River, Harlem River, Long Island Sound, Atlantic Ocean, Upper New York Bay, Lower New York Bay

Norfolk	City	VA	261,250	234,463	242,840	238,005	235,089
Norman	City	OK	80,057	96,815	110,876	127,224	128,097
North Charleston	City	SC	86,483	85,806	97,591	115,113	117,472
North Las Vegas	City	NV	48,018	116,527	216,670	262,678	274,133
Norwalk	City	CA	94,232	103,539	105,549	102,910	100,373
Oakland	City	CA	372,248	399,334	390,781	439,349	433,823
Oceanside	City	CA	128,215	160,645	167,560	174,352	172,982
Odessa	City	TX	89,737	90,726	99,878	114,368	112,483
Oklahoma City	City	OK	444,566	505,530	580,494	681,387	687,725
Olathe	City	KS	64,157	93,069	125,900	141,238	143,014
Omaha	City	NE	393,406	439,360	458,992	490,627	487,300
Ontario	City	CA	135,001	158,011	163,931	175,518	177,963
Orange	City	CA	111,399	129,744	136,778	138,992	137,264
Orlando	City	FL	178,697	194,880	238,723	307,674	309,154
Overland Park	City	KS	111,606	150,676	173,329	197,295	197,106
Oxnard	City	CA	142,454	170,179	198,066	202,185	201,879
Palm Bay	City	FL	62,652	79,403	104,006	119,874	122,942
Palmdale	City	CA	78,023	116,891	152,731	169,913	165,761
Paradise	CDP	NV	123,993	178,125	183,701	191,238	*192,000*
Pasadena	City	CA	131,969	133,842	137,085	138,679	135,732
Pasadena	City	TX	119,622	141,763	149,389	151,955	148,626
Paterson	City	NJ	140,737	149,230	146,184	159,674	157,794
Pearland	City	TX	27,387	47,422	93,159	125,944	125,990

Alan Camp Architects
@AC_Architects AC_Architects

Alan Camp Architects
88 Union Street, London, SE1 0NW
mail@alancamp.com | www.alancamp.com