



**tcpa**

Alison Bell  
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Submitted via Appeals Casework Portal

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Dear Ms Bell,

**Ref: APP/C1950/W/22/3294860**

The Town & Country Planning Association (TCPA) stands by its submission made on 30 April 2021 to Ms C Howe in response to consultation on applications references 6/2021/0181/MAJ, 6/2021/0671/MAJ and 6/2020/3420/MAJ. While the TCPA welcomes the addition of new homes, especially rented social housing, and also the regeneration of this central brownfield site and the iconic Shredded Wheat buildings, we believe that the applications would compromise the long-term sustainability of this important site and the wider Garden City.

The TCPA has had no involvement in the development of this scheme, and we are therefore not able to endorse the claim that the scheme accords with the Garden City Principles. The appellant's Statement of Case makes frequent reference to how the proposals have been developed in line with the TCPA Garden City Principles and how the Design and Access Statement and Health and Wellbeing and Planning Statement include a comparison of performance against the Garden City Principles. While consideration of the Garden City Principles is a welcome approach, the analysis has ignored the fact that the Principles are an indivisible and interlocking framework for the delivery of exemplary new and renewed places. The analysis of performance against the principles fully omits two of the Garden City Principles; there is no mention of the Principles relating to community ownership of land and long-term stewardship of assets. The issue of long-term stewardship is critically important and a key component of the 'lifespan' aspect of the National Design Code. Innovative models of long-term stewardship and community-led housing, even on a site at this stage, can also enable some form of land value capture for the benefit of the community, another principle which has been side-lined.

A site of this kind demands an exemplar application of the Garden City Principles, and we remain deeply concerned that any development in Welwyn Garden City which compromises the core values of this unique Garden City should not be permitted.

Yours sincerely

Fiona Howie  
Chief executive