



# WELWYN GARDEN CITY SOCIETY

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## **Plutus and ZM Planning Application public consultation responses 27th March 2018**

**Planning application reference: 6/2018/0171/MA**

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The Welwyn Garden City Society submits the following responses with regard to this application.

### Introduction:

The Society welcomes an appropriate new development on this site. Despite its grade 2 listing status the site has been allowed to decay for the last decade with minimal apparent preventative maintenance. This iconic site has been a depressing eyesore for local residents and has also served to leave those passing through on the train with a poor impression of the town due to this long-standing example of apparent industrial decay. We want to support an ambitious, well thought through, deliverable development on this site. The Society was very vocal in its objection to the original development plans proposed by Tesco/Spenhill. This new development proposal is a very different proposition, not least because it goes much further in meeting the requirements of the WHBC Supplementary Planning Document than did the previous plan.

The Society has met the developer and had a tour of the site with them to hear their vision firsthand. They are clearly committed and passionate about the site, recognising its history and also what it could be transformed into if their vision can be realized. This proposal clearly requires a very significant investment from them if it is to be realised. That investment will require a business model which will see it repaid in due course and profit realised. This is not social housing and there is no public money funding it. Quite the reverse, in fact, as a significant sum will also be due to WHBC in the form of S.106 or CIL payments per dwelling.

Therefore, we are aware that everything on the site has to be a viable financial proposition. This is a reality of modern development, but it also means that a keen eye must be kept on what is in the best interests of the town and town centre, and how this development will fit in with what already surrounds it. It should have an overall positive impact on the town as it approaches its centenary. The underpinning business model and economics of this development is far removed from the altruistic idealism of Ebenezer Howard, who intended to capture the monetary "unearned increment" that was generated because of rising land values as a result of his developments. This is very different to the private developer-led proposal before us now but it is the reality of most large-scale developments today.

The Society is keen to see the developer move things forward on the site and has sought to review the extensive documentation library provided as part of this application by Plutus Estates. However, the Development Management Committee needs to clarify a number of aspects of these plans before it can satisfy itself that the proposed development will not damage or become a blight on the town.

It is also evident from the proposals that there are many "sloppy" errors within the proposals which suggest that due attention has not been paid to the reality of the development and its impact on the town. It further suggests that, despite claims to the contrary, the developer has not had "meaningful" two way discussions with residents in the town. For its part, the Society has had tours of the site and has been told that this is what the developer intends to do but has had no significant input (or meetings with the developer about their proposals). Some suggestions were made by the Society members at the Howard Centre venue where the proposals were first exposed to residents but these do not appear to have been incorporated into these final plans. For that reason, the Management Development Committee should insist that these statements are corrected and should ask the developer what changes made by residents have been incorporated into their final proposals. Unless the Management Development Committee checks what has happened, it will be highly exposed if the development proves to be any less than is made out: the damage the developer runs is that it is imposing a design on the town that meets its own financial targets but fails the town.

The Society is disappointed with the quality of the submission in certain respects, including those of appearance, design, aesthetics and green space. It was expecting a design and layout that represented a step forward in the design of high density housing and that in some way marked a way forward in such housing schemes. This does not necessarily mean replicating Welwyn Garden City design precisely, but showing showing some attention to detail with appropriate reflective echoes. The submission lacks greenness for a Garden City development - it looks barren. The architecture is very run of the mill and can be found on housing estates anywhere. At a time when even the Government is asking for a move away from uninspiring house design, surely a Garden City must do better? It is possible to build exciting housing blocks. One only has to go to look at some modern university housing to see what can be done by top architects. This development should be a wonderful opportunity to put down a marker for future high density developments, reflecting the ethos laid down in the original Garden Cities. It has failed to achieve this as things stand. Singapore and other cities with high density housing have been adopting designs to green up high rise buildings and their environment. If they can do this why cannot Welwyn Garden City? At the end of the day, it is about creating a built environment that results in an improvement in quality of life for the residents. The Society does not think the current submission meets these aspirations, unfortunately. We are very happy to meet with the developer's representatives however, to explore alterations to the proposal that would better meet the points above and below.

The following represents the main points we seek to raise with regards to this application:

No.	Document reference	Section reference	WGCS Comment
1	Various-general comment		<p>The side view of the site from the railway in the submission is an architectural drawing that has no perspective. This may exaggerate the difference in height of the buildings. But when viewed from near ground level the intervening buildings will essentially cut out the view. The view of the factory from the trains is one of the key views and images of the town. It surely ought to be maintained particularly since in promoting their scheme to the society, the developer was at pains to say that they had been in contact with the previous owners (Cereal Partners) about reinstating the iconic "Shredded Wheat" sign down from the building facing the railways. The sign incidentally appears to have been removed without planning approval.</p>
2	Various-general comment		<p>The tower blocks are all too similar in appearance - they surround the de Soissons original building. The two blocks between the de Soissons building and the railway are far too high. The silos can also currently be seen from Howardgate and this view would be lost.</p>
3	Various-general comment		<p>There is an apparent lack of greenery on the site - particularly when you read the WHBC policy on the matter in the WHBC Tree Strategy for high density areas - green roofs and green walls, etc. How will this development demonstrably meet those goals? How will this development sit with the town's "garden city" image.</p>
4	Various-general comment		<p>Has the developer made a mistake in their estimates of car ownership? They need to recalculate their figures based on the town as a whole. In any event, the Society continues to be sceptical about the ratios of car to people used in Council policies in these new higher density developments: it thinks they will result in significant impact on local residents who live close by.</p>
5	Various-general comment		<p>As to the exterior wall finishes, they should match the current brick colours used in WGC. The original SPD stipulated that the development on this site should follow the industrial heritage of the site. Now that most of this is gone and the remaining block is so</p>

			limited, there ought to be a more determined effort to link the two sides of the town through the colours of the blocks and the materials used on the site. The developers should be more creative in bringing greenery into their highly dense site to link it more closely to the green ancestry of the place by the use of green walls on some of the blocks. This would also soften their impact.
6	Delivering the Wheat Quarter	Page 10 diagram	The organigram on this page is too low resolution to be read in parts. The section at the bottom may state something important but it cannot be read at all, even when it is zoomed up.
7	Delivering the Wheat Quarter	Page 14 Other funding sources	The Estate Management Company indicates it will work on "opportunities to develop new revenue streams and uses to meet the needs of the occupiers within the Estate" - Will the occupiers have a say on these opportunities? For example, if they are noisy or create congestion? How will the profits from them be used and by whom? Will profits be used to lower the service charge for occupiers?
8	Delivering the Wheat Quarter	Page 25, section 9	There is mention of full-time security guards and CCTV surveillance: who will pay for this? Why is there no mention of the police, street wardens, Neighbourhood Watch schemes etc.? The development should avoid feeling like a gated development with visible and ever-present security. WGC does not have a high level of crime and doesn't have residential developments with full-time security and heavy surveillance. This has its place but too much of it will detract from the openness and atmosphere of the place.
9	Delivering the Wheat Quarter	Page 27 Local Employment	Will these be direct jobs working for the Estate Management Company, or will they be agency workers on minimum wage and flexible short-term contracts? For this aspect to be meaningful these should be real jobs with fair pay and conditions for locally employed staff.
10	6-2018-0171-MAJ_planning_Delivering the Wheat Quarter [Final]	Page 45 WGC Well Being centre	The description of this proposed centre seems to be trying to be all things to all people. Covering an extremely broad range of services, many of which rarely exist under the same roof. It talks about Mental Health services but there is already a hub for Mental Health services, newly built, only about half a mile from the site. It doesn't even state which

			<p>of these services will be run by the NHS or local authority social care services. Is any of this on the radar with these bodies? Have they agreed to fund it as required and is it on their budget plans? Has the list of external organisations named agreed to provide services in these centres? If so, what will the cost be to them? Many of them have had to cut back services in recent years and this aspect of the plan does look less than hopeful. Who will manage this facility day to day? How will the administration and other staff be funded? Will it be privately run or run by the NHS/HPFT etc.? If the services are mainly private and therefore fee paying, will the residents in the affordable housing part of the proposal be able to afford and access them? If not, what will be the benefit of this to them? Will the overall service charge to residents be used to fund the wellbeing centre? In summary, is this proposal a costed, viable and planned proposition that will benefit the majority of people who rely on health services free at the point of access? It is known that some of the bodies listed have not even been approached about taking space within the centre. All of this seems to be merely a wish list with no evidence that any of these providers will have any presence. It is also unusual that NHS services share a facility with complementary services that may have no recognition in the fields of evidence-based medicine and therapy.</p>
11	Delivering the Wheat Quarter	Page 54 statement about the town's history	<p>The reference to Le Corbusier and the town being a leafy Beaux-Arts planned town is not something that sits in the minds of town residents. It is out of place and inappropriate. The former's reputation for brutalist architectural design is not desirable today, and the latter is concerned with baroque, rococo and neoclassical design influences. This doesn't seem to be what the current proposal represents.</p>
12	Delivering the Wheat Quarter	Page 72 "Motorbike Museum"	<p>More explanation of the statement is needed to substantiate the statement "Motorbike production forms an important part of the locality's industrial history". This Society is not aware of this heritage, nor are long standing residents. The town has a rich engineering and production history, but not</p>

			<p>one that includes the production of motorcycles. We are not opposing the idea, but this fact should be substantiated. We also note proposals for "Historic Classic car &amp; classic motorbike events". This is likely to take up a lot of space, create noise, and disrupt the lives of residents in the estate. Has it been fully worked out how these events could be staged? There are already annual car shows in WGC, Tewin and Knebworth. This is not a bad idea but seems to be based on the idiosyncratic ideas of the developer rather than based on the history of the town.</p>
13	Delivering the Wheat Quarter	Page 75	<p>There are no details of a WGC history/heritage museum space, in conjunction with the museum service who we know are lacking sufficient exhibition space for all their assets. Where are the plans for this? They were cited in our tour of the site as a key issue for the developer.</p>
14	6-2018-0171-MAJ_planning_2018 02 06_Shredded Wheat Affordable Housing Statement [FINAL]	Page 31 Section 7.9	<p>It is also worth noting that the S106 Agreement pertaining to the consented scheme provided a breakdown of the "agreed mix" in respect of affordable housing. Details of this mix are provided in Section 6. However, it is clear that no houses for social rent were provided within the previous scheme: only affordable rent and shared ownership. In terms of dwelling mix, they are proposing the same now, however the only difference is that the proposal now contains a provision of affordable rent for over-55's."</p> <p>It seems to be the case that none of these dwellings will be for social renting, and the majority will be shared ownership, a form of tenure that has been problematic for many people. In some ways this offers residents the worst of all worlds, having to pay rent and a mortgage as well as other service charges and fees. Is there no scope for the provision of genuinely affordable housing? Further, in this scenario it seems very unlikely that this development will cater for any residents currently on the WHBC Housing Register. The register has several thousand residents on it, many have been on it for many years with little hope of being offered a social rent tenancy. This development will do nothing to ease this local housing problem.</p>

15	6-2018-0171-MAJ_planning_2018 02 06_Shredded Wheat Affordable Housing Statement [FINAL]	Page 12 section 2.1	<p>Type of Housing:  Proposed Market Housing 926  Proposed Affordable Rented Housing 106  Proposed Affordable Rent for Over-55's 50  Proposed Intermediate Housing 258</p> <p>The Government definition of affordable housing is as follows "Affordable rented housing is let by local authorities or private registered providers of social housing to households who are eligible for social rented housing. Affordable Rent is subject to rent controls that require a rent of no more than 80 per cent of the local market rent (including service charges, where applicable)." While intermediate housing is:</p> <p>"Intermediate housing is homes for sale and rent provided at a cost above social rent, but below market levels subject to the criteria in the Affordable Housing definition above. These can include shared equity (shared ownership and equity loans), other low cost homes for sale and intermediate rent, but not affordable rented housing. Homes that do not meet the above definition of affordable housing, such as 'low cost market' housing, may not be considered as affordable housing for planning purposes."</p> <p>It follows therefore that the majority of homes in this segment, 258 are not really classed as affordable rented housing, such as may be in demand by key workers. The claimed 31% of affordable dwellings should be evaluated carefully by WHBC, affordable for who and will what's on offer do contribute anything towards reducing the WHBC Housing List?</p>
16	6-2018-0171-MAJ_planning_2018 02 06_Shredded Wheat Affordable Housing Statement [FINAL]	Page 15, section 3.7	<p>Who will perform the Estate Management for the whole site, will it be Metropolitan Housing Trust (MHT) as implied here, and if it is tenure blind will the level set also fall within the definition required for the affordable housing provision?</p>
17	6-2018-0171-	Page 29, 6.14	<p>MHT's affordable housing provision does not comprise any conventional social rented</p>

	MAJ_planning_2018 02 06_Shredded Wheat Affordable Housing Statement [FINAL		housing. In this regard, MHT has experienced significant management problems when social rented housing is provided alongside affordable rent due to the wildly differing rent levels paid by residents for what is essentially the same rental product. In addition, social rented housing would materially affect the viability and development of the scheme and, given the importance of immediate delivery of such an important site, MHT has made a conscious decision to not provide social rented housing.
18	6-2018-0171-MAJ_planning_180116 Shredded Wheat Planning Statement FINAL	Page 17/18 section 4.3	Overall, there is less than one parking space per dwelling on the assumption that those living there will not want or need their own vehicle. There will be a "car club" using shared electric vehicles which is given as a reason for a reduced number of parking spaces. There will be 88 parking spaces set aside for car club use. In total, there will be 1,135 spaces including commercial/retail parking spaces. If the commercial aspects of the development are very successful, where will visitors park? Parking is already at near capacity on busy days in the town centre. Who will pick up the long term running costs of any car club scheme?
19	6-2018-0171-MAJ_planning_20180111 Welwyn Garden City TA_RF_V2 (text only)(1)	Page 12, section 5.13	"Within the proposed development site, there is currently secure cycle parking for approximately 90 cycles along Hydeway. These stands are heavily utilised by commuters who park on Hydeway and then use the footbridge to access the railway station and Welwyn Garden City town centre."  This is not true; there is no secure parking on Hydeway. The police will tell you that bikes are stolen or damaged there all the time as there is no security; there is a camera but apparently it isn't monitored by anyone since Cereal Partners departed. By contrast, Network Rail provide secure cycle storage at most other stations on the line already but there are none of these at WGC station.



20	6-2018-0171-MAJ_planning_20180111 Welwyn Garden City TA_RF_V2 (text only)(1)	Page 22, section 7.2	"The approved proposals provided an average of 1.02 parking spaces per dwelling across the site." This figure is higher than stated in point 14 above. So what is being provided?
21	6-2018-0171-MAJ_planning_20180115 WGC_FTP_V2(1)(1)	Page 41, section 12.1.3	"The developer will enter into a legal agreement pursuant to Section 106 of the Town and Country Planning Act preventing residents of the development applying for residents' parking permits. This would ensure the intended low-car and car-free housing remains so in perpetuity or unless the Council wishes to remove the restriction. Any such legal obligation would run with the property irrespective of ownership." Is this viable, fair, and is it in line with a Garden City ethos?
22	Former Shredded Wheat Factory, Broadwater Rd, Welwyn Garden City Transport Assessment	Page 47 Section 15.18	"The footbridge over the railway will be refurbished and provided with a new, wider set of steps on the site side, together with a new passenger lift" There appears to be no plan or detail at all regarding the refurbishment of the bridge. This is a key factor in the development and should be documented properly and shown as part of the plan. It is key requirement of the Council as set out in the SPD.
23	6-2018-0171-MAJ_planning_16037_WGC_North Site_P1(N-04-05)-105 - Block 04-05 - Fifth Floor(1)	Page 26 2.2	Quote: "Welwyn Garden City today is a town with a population of 116,000 (ONS estimate mid-year 2014) and a strong commercial base. Companies such as Ocado, Roche, Tesco, and Xerox are based there" This population figure is wrong, 122,000 is for the entire borough. Ocado is not based in WGC. Xerox is not based in WGC.
24	6-2018-0171-MAJ_planning_SOL171 OPEL01-Shredded Wheat_ES_Energy		A CHP plant appears to be for the north side only, the private market part of the site. The affordable housing tenants will not benefit from this. Will either site have reduced energy bills as a result of the CHP and PV renewables? Who will benefit from locally generated energy? If one part of the site has water heating what benefit will that be to the

	Statement(1)		remainder of the site How will emissions from the CHP plant be managed? Who pay for the fuel and running costs for the CHP plant?
25	6-2018-0171-MAJ_planning_SOL1710PEL01-Shredded Wheat_ES_Energy Statement(1)		How will the upkeep and maintenance of the PV panels be paid for on the south site? Will this mean reduced electricity charges for occupiers, will it feed the dwellings directly? Will the developer be generating an income from this?
26	6-2018-0171-MAJ_planning_20180111 Welwyn Garden City TA_RF_V2 (text only)(1)	Page 29, section 7.9	<p>This states "The DCLG research paper shows that if all parking spaces are allocated to individual dwellings then demand for parking spaces increases. This is, in part, a result of parking spaces being allocated to households who do not own a vehicle. In 2011 the Census data showed that around 40% of all households living in flats in the Peartree ward had no vehicle".</p> <p>We do not think this is a valid comparison. A large proportion of the flats in Peartree are local authority, housing association and social housing ones. Tenants in general may be less likely to be able to afford to run a vehicle, or may be less likely to be drivers, than the expected occupants of the new flats. It is significant that none of the flats will be social housing and therefore allocations will not be coming from the WHBC housing register. It would seem likely that owner occupiers of these new flat will want at least one parking space in general as they are likely to have a vehicle, even if they commute by rail.</p>
27	6-2018-0171-MAJ_planning_18-01-12_WGC South Site_Area schedule_Rev P2	Page 7 table Page 3 table	The parking ratios are: south site "affordable housing"- this has just under three quarters of a space per flat. North site private housing- this has just over half a space per flat. Will this be enough for the social demographic this development is targeted at?

28	6-2018-0171-MAJ_planning_20180115 WGC_FTP_V2(1)(1)	Page 29 9.8.2	<p>“The developer will enter into a legal agreement pursuant to Section 106 of the Town and Country Planning Act preventing residents of the development applying for on-street residents’ parking permits. This would ensure the intended low-car and car-free housing remains so in perpetuity or unless the Council wishes to remove the restriction. Any such legal obligation would run with the property irrespective of ownership.”</p> <p>Is it fair to prevent on-street parking when the ratio of spaces per dwelling is less than one space per dwelling? We suggest that even if this proposal is legal, its intent is unenforceable: Residents will acquire vehicles but will park them elsewhere and to the detriment of housing outside the development requiring substantial policing at a significant cost to the borough council.</p>
29	6-2018-0171-MAJ_planning_ApplicationFormNoPersonalData  And then:  6-2018-0171-MAJ_planning_2018 02 06_Shredded Wheat Affordable Housing Statement [FINAL]		<p>The Planning application from the developer states in a table page 5 that there will be “161 Social Housing flats/maisonettes”. The document is dated 16<sup>th</sup> January 2018. It also shows that there will be no key worker housing provision. However, page 28 in section 6.8 and 6.7 states:</p> <p>“It is clear from the above that no social rent was provided within the previous scheme. Only affordable rent and shared ownership. In terms of dwelling mix, we are proposing the same now, however the only difference is that the proposal now contains a provision of affordable rent for over-55’s” Section 6.14 also states: “social rented housing would materially affect the viability and developability of the scheme and given the importance of immediate delivery of such an important site, MHT has made a conscious decision to not provide social rented housing.”</p> <p>These two statements clearly conflict, why does the planning application form state 161 social housing dwellings but then the Affordable Housing Statement states that there will be none, and still no key worker provision.</p>

30	6-2018-0171-MAJ_planning_20180111 Welwyn Garden City TA_RF_V2	Page 46, 14.4 and 14.5	<p>In relation to the Bridge Road junction and proposed roundabout it states: "The existing signalised crossroads of Broadwater Road / Bridge Road and Bessemer Road will be altered to a shared space 'octabout', as shown in TPA drawing 1309-14-PL106, included here within Appendix N. 14.15. The proposed octabout will operate along the same principles as a roundabout albeit on a less formal basis, as the intention is to introduce controlled uncertainty to drivers which will result in slower vehicle speeds and a more agreeable environment for pedestrians and cyclists."</p> <p>Is this the view of Herts Highways? There was a plan for a far more sophisticated roundabout, similar to the one that was present for many years before the traffic lights were installed. Appendix N does not show any more than a single small roundabout, how is this an "Octabout"?</p>
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