

BioPark Planning Appeal
Proof of Evidence
Welwyn Garden City Society

Garden City Principles
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1. Introduction

1. I am Susan Parham and I have prepared this proof of evidence on garden city principles for the BioPark Appeal proposal APP/C1950/W/22/3294860.
2. I am the director of the University of Hertfordshire Urbanism Unit in the School of Life and Medical Sciences (UHUU), which is a centre for planning and urbanism-related activity.
3. I have been asked to give evidence in relation to the BioPark site and the Appeal proposal, based on my expertise in relation to garden cities.
4. I begin by setting out briefly my qualifications & experience.
5. I then explain the relevant garden city context with reference to garden city principles and character, master-planning and housing and I explore site issues relating to these aspects.
6. Finally, I explore alternative ways to approach the planning and urbanism issues raised by the site, in ways more in keeping with garden city principles.

2. Qualifications and Experience

2.1 Academic qualifications

7. I have academic qualifications in:
 - a. political economy (BA, Adelaide University)
 - b. town planning (Graduate Diploma in Urban and Regional Planning and year of bridging subjects, University of South Australia)
 - c. urban design (MA in Urban Design, University of Westminster) and
 - d. urban sociology (PhD, London School of Economics Cities Programme).

2.2 Current academic roles

8. Since 2010 I have been employed in the full-time academic role of Head of Urbanism (and, since 2017, Head of Urbanism and Planning) at the University of Hertfordshire.
9. In 2015 I was appointed to the role of (inaugural) Academic Director of the International Garden Cities Institute at Letchworth established by Letchworth Garden City Heritage Foundation.
10. In 2018 I became the director of the newly established University of Hertfordshire Urbanism Unit (UHUU) which is a centre for planning and urbanism-related activity. I was appointed as an Associate Professor in August 2019.
11. Prior to my current academic role, I was a director of a sustainability and planning consultancy practice, CAG Consultants, and previously worked in a number of senior roles in strategic planning for the Government of South Australia and as an urban analyst and rapporteur for the OECD.
12. I have written on a number of planning, urban design and urbanism themes since 1990 including garden cities and new towns, and on food and urbanism including in relation to garden cities.

3. Relevant background and main issues

3.1 Garden City Principles

13. I begin by setting out briefly the relevant garden city context. Welwyn Garden City was developed according to garden city principles distilled from Ebenezer Howard's work. These have been publicised by the TCPA and a similar set is also listed on the International Garden Cities Institute website:
 - a. Strong vision, leadership and community engagement
 - b. Land value capture for the benefit of the community
 - c. Community ownership of land and long-term stewardship of assets
 - d. Mixed-tenure homes and housing types that are affordable for ordinary people
 - e. Beautifully and imaginatively designed homes with gardens in healthy communities
 - f. A strong local jobs offer in the Garden City itself and within easy commuting distance
 - g. Opportunities for residents to grow their own food, including allotments
 - h. Generous green space, including: surrounding belt of countryside to prevent unplanned sprawl; well connected and biodiversity-rich public parks; high quality gardens; tree-lined streets; and open spaces
 - i. Strong cultural, recreational and shopping facilities in walkable neighbourhoods

j. Integrated and accessible transport systems

14. The TCPA notes that these “principles are an indivisible and interlocking framework for their delivery”. It is not possible to pick and choose between which principles to apply – they are a holistic set.

3.2 Expressing garden city principles through garden city master plans that established place-character

Masterplanning

15. The garden city principles have been expressed through master plans in Letchworth Garden City (1904) and Welwyn Garden City (1920). Both Barry Parker and Raymond Unwin, the Letchworth masterplanners, and Louis de Soissons somewhat later in Welwyn, developed particular place-shaping devices that gave garden cities their character and place identity.
16. These masterplans primarily showed neighbourhoods of connected, curvilinear grid-based, tree lined streets with housing at low densities of around 12 dwellings to the hectare to allow space for substantial private gardens, green closes and communal food gardens shared between small numbers of dwellings (Ben-Joseph & Gordon, 2000: 239).
17. In each case the substantial greenspace was formally configured in the town centre, and threaded through and around the settlements, leading to agricultural greenbelts on settlement edges. Most of these place shaping basics were also key to Raymond Unwin’s master plan at Hampstead Garden Suburb developed from 1906.
18. In Welwyn Garden City, Louis de Soissons (1927) drew on this design patrimony, and his master plan shows some similar place shaping arrangements to Letchworth, although the food aspects were rather less fully integrated (Parham, 2020). De Soissons produced a revised master plan in 1949 for the newly designated New Town which extended residential areas and proposed completion of the town centre (Bridges Associates, 2020: 45).

3.3 Garden city housing forms

19. Within these garden cities, very particular forms of housing developed which shared many character elements:
- a. Houses designed by Barry Parker, Raymond Unwin and other architects active in Letchworth Garden City and later Hampstead Garden Suburb fitted into the overall masterplans in terms of scale, height, density, and materials.
 - b. Houses were built in groups and were almost entirely low density, low rise (one to three stories at most), vernacular in appearance using local materials, with front gardens separated from the street by low hedges and providing an intentional sense of homeliness expressed in both their exteriors nestled in gardens and through their interior cosiness designed for family life (Parker, 1901). This ‘Letchworth look’ housing

included roughcast render cladding over bricks, red roof tiles, green drainpipes, water butts, and doors, and gables and dormer windows (IGCI, undated).

3.4 Welwyn Garden City housing

20. While Letchworth drew on Arts and Crafts architecture for its architectural style and grammar and this style is globally associated with the image of the garden city, in Welwyn, de Soissons chose a neo-Georgian architecture drawing on the design example of nearby towns of Hertford, St Albans and Old Hatfield (Roberts and Taylor, 2017: 56).
21. This provided a simple, appealing, and reproducible model for housing character of white timber sash windows, pan-tile roofs and locally produced red bricks to produce low density, low rise, modest, human-scaled dwellings. Again, this housing used local, vernacular materials (a brick works was built to supply bricks for house building).
22. While architectural expression was at first something of a medley the Welwyn Garden City Company then imposed strict architectural regulations “stipulating that ‘all plans, elevations, sections, and specifications must be approved by the Company’ which to all intents and purposes meant de Soissons (Roberts and Taylor, 2017:15). With de Soissons and Kenyon designing a high proportion of the housing, Welwyn was able to develop a holistic urban environment whose strength lay in its street scene.

3.5 Welwyn place design

23. De Soissons made use of the garden city principles embedded in Raymond Unwin’s street design proposals (1909) with careful grouping and varying setbacks of houses with large gardens in closes and greens and along curving tree lined streets, in neighbourhoods carefully configured with greensward landscapes including food growing space (Stern et al, 2013: 238; Parham, 2020).
24. Culs de sac reached an apogee here with four types of close, making “imaginative spatial use of varying streetscapes” (Roberts and Taylor, 2017: 54). In designing these housing clusters to avoid monotony de Soissons varied the housing typology between detached, semi-detached and terrace housing and created “micro communities evocative of traditional English village greens which was much valued by residents” (ibid).
25. In so doing, de Soissons kept as many as possible of the existing trees, hedgerows and landscape features contributing to a highly walkable and pleasant shaded environment. Existing trees were used to provide focal points at road junctions and to shape greens that would contribute to the charm of an open village layout. Purdom (1925) wrote about Welwyn Garden City residents walking to work under cooling trees. De Soissons was deft in harmonising these different architectural contributions into the overall master plan.
26. Given the site under consideration is close to WGC town centre and thus might be considered to have claims to be suitable for a higher density design, it is worth looking at any Letchworth Garden City, Welwyn Garden City and Hampstead Garden Suburb built form and place design models for bigger buildings as a possible guide to relevant character for any new development.

27. Howard was very taken with quadrangle plans drawing on monastic and academic settings, to be used in garden cities in pursuit of its collective aims and spatially configured to allow for communal services such as dining and kitchens. Homesgarth in Letchworth Garden City is the earliest example of such a quadrangle influenced plan, but later versions are found in Hampstead Garden Suburb in the flats designed by Courtenay Crickmer, in JBF Cowper's Heathcroft and Ernst Freud's four storey Belvedere Court.

3.6 Neo-Georgian architecture in Welwyn town centre and residential areas

28. Both commercial and retail buildings designed by de Soissons in Welwyn Garden City employed the "well mannered, quiet simplicity" of Georgian's dignified classicism in architectural style (Roberts and Taylor, 2017: 60).

29. De Soissons talked often "of the importance of adapting the Georgian proportions and principles to modern living requirements not only to houses and public buildings, but shops and offices" (ibid).

30. Prominent larger buildings in neo-Georgian style included:

- a. the three-storey Barclays and Midlands Banks (both 1929),
- b. W H Smith on Howardsgate (1930),
- c. the Embassy Cinema (now demolished, 1933),
- d. the rebuilt Welwyn Stores (now John Lewis) by de Soissons (1938-1939) and
- e. the WGC Urban District Council offices designed by C.G. Elsom and H. Stone (1942).

31. Some more recent buildings at scale have not responded architecturally to this neo-Georgian coherence such as the Campus West buildings at the northern end of the town centre opened in 1973 although the Howard Centre built in 1990 does reference these character aspects to a limited extent. Even with these substantial buildings, in each case the height is no more than two to five storeys, with a small part of the Campus West development a six-storey outlier.

32. Scale is thus larger than the residential stock but is broken up by human scaled window proportions and other details in the earlier buildings which make close reference to the neo-Georgian architecture of Welwyn's housing, contributing to the City's character coherence.

33. Both domestic and commercial neo-Georgian buildings tend to be under-appreciated architecturally today rather than a valuable 20th century heritage patrimony. As Roberts and Taylor (2017: 56) note "By the 1920s the partiality for the heterogenous vernacular of the Arts and Crafts movement that personified Letchworth's houses had been firmly displaced by the restraint and symmetry of the Georgian era. Neo-Georgian became a national idiom that dominated not only domestic structures, but also schools, universities, town halls and post offices up to World War II".

34. Although Welwyn was deemed a handsome town (Clough William-Ellis, quoted in Stern et al, 2013), this form of architecture has generally received responses ranging from lukewarm

support to outright hostility from within the architectural profession, from the mid 20th century onwards. Present day architectural hostility to the neo-Georgian architecture of the new town of Poundbury, is a contemporary example whereby, as in Welwyn, domestic and civic architecture has similarly proved popular with residents and unpopular with architects.

35. However, rather than being caught up in discussions of neo-Georgian as a style, the critical point here is that this architectural language and the related place making provide a strongly coherent sense of place and character to Welwyn Garden City that is both pleasant to live in and to move around.

3.7 Industrial buildings and places

36. It is worth briefly considering whether industrial buildings offer a relevant architectural model in terms of design, height and scale for the development given the proposals assert that the silos' height and scale is a relevant placemaking form-giving consideration.
37. Showing his capacity in other idioms, de Soissons designed the modern Shredded Wheat factory in 1924-25, to which Otto Salvisberg's modernist Hoffman-La Roche factory office building was added in the late 1930s.
38. Further afield the Grade II listed Spirella Building in Letchworth built from 1912 to 1920, originally a corset factory, in an Arts and Crafts style, might be considered another reference point in terms of scale.
39. In all cases though, the height is no more than five storeys except for the silo buildings. Such grain silos were cited and visualised by Le Corbusier (1923) as an appropriately modernist form which should be reflected in high rise building design he proposed to replace existing traditional cities such as Paris. To make the silos look suitably modernist, Le Corbusier erased their pitched roofs from the visual depiction in *Vers Une Architecture* (1923).

4. The site – main issues

4.1 Introduction

40. The following analysis of issues is based on points summarised above, further supporting evidence drawing on additional academic, policy and practice sources, and site documentation and related planning documents from WHDC.

4.2 Meeting the garden city principles

41. Considering the site from a garden city principles perspective what is proposed does not meet the principles in range of process and place related respects.
42. There appears to be a lack of meaningful engagement in the documentation from the applicants on the garden city principles. The Statement of Case mentions the Town and Country Planning Association Garden City Principles (2020) in three places (at 6.34, 6.37 and 7.58) and refers to Howard's vision (at 6.40) and states that the principles are a material

planning consideration. However, the mention at 6.34 that the TCPA garden city principles are a key driver for the design contracts and thus misstates what the TCPA principles actually say in relation to housing in its context. The TCPA states: “Beautifully and imaginatively designed homes with gardens, combining the best of town and country to create healthy communities, and including opportunities to grow food.” In the Case statement the best of town and country, healthy communities and food growing are all missing. Similarly, at 6.34 where it is stated that the principle covers “homes which are complemented by attractive green spaces for the local community” this does not capture the breadth and depth of the principle including its focus on productive space close to home, relevant housing typologies and abundant green space. There is thus a significant elision between the principles as stated by the TCPA and the statement in the Case.

43. Within the Non Technical Summary there is one mention identified which says that Howard sought settlement self-containment (p23 of the Non Technical Summary) however Howard (1898) envisaged garden cities interconnecting with other places in a constellation of settlements making up the ‘sociable city’ (Hall, 1998).
44. Most obviously the site is not based on community ownership of assets or on land value capture. There appears to be no mention of or engagement with this principle. There are ways that such garden city development might include such elements at least at a limited level.
45. Evidence provided by the Welwyn Garden City Society offers a useful comparison between the TCPA garden city principles list and the performance of the site, showing where specifically it fails to meet these.

4.3 Understanding of the garden city character

46. The proposals themselves and the discussion of townscape, heritage and character in the BioPark proposals including the Statement of Case, the Non Technical Statement (HGH Consulting, Undated) and the SLHA Broadwater Gardens Appendix 1 Heritage and Townscape Assessment suggest at both housing and place shaping level a significant slippage between what is said in the text (such as at pages 43, 44 and 53 of the Townscape Assessment) about the site including its impact in terms of character, architecture, housing typologies, materials and public spaces and what is shown in the visualisations including plans and drawings. The language used in each case also gives the impression of a lack of insight into both the garden city principles and what constitutes character and identity at the local and City level.
47. In the Statement of Case at 6.34 it is noted that the industrial heritage is used as a cue to character, identity and form (and materials at 6.38) and argued this “seeks to enhance the sense of place by responding to its surrounding local distinctiveness”. The rationale as given at 6.40 is that this responds to the historic precedent of large footprint commercial and factory buildings here “as part of Howard’s vision”. Again this is incorrect. Howard showed in his diagrammatic work and discussed in his text providing space for local employment but these industrial areas were not envisaged as giving cues for residential design and character. Drawing on Howard’s vision, employment areas were then designed as specific zones apart from residential neighbourhoods in the Parker and Unwin and then the de Soissons masterplans.

48. The Statement of Case makes a series of mentions of 'contemporary' design (6.35, 6.37, 7.11 and 8.11) although what contemporary means in character, place identity, built form and landscape in these circumstances is not directly stated. Rather, these are all implied by the visual material and statements about using industrial buildings as design cues.
49. The implied assumptions about what should constitute the contemporary may go back to the dominance of a Venice Charter (1964) based approach to building new urban fabric in existing places which means contextual design would be considered 'pastiche' or 'nostalgia' and thus unacceptable. The requirement in Article 9 of the Charter that "new work must be distinct from the architectural composition and bear a contemporary stamp...has been misused to justify contrasting modern additions, alterations and new buildings in historic places worldwide and to validate modernist interventions in traditional buildings and places. In recent years, these misused clauses have become a crucial regulatory tool used in development control to block any form of traditional design."
50. The 1964 Venice Charter is based on an implied assumption that only some materials and architectural styles are 'contemporary' or 'of their time.' Contemporary materials and methods are widely seen as interchangeable with modernist design using concrete, glass and steel construction with 20th century stylistic details associated with architectural modernism. The site proposals make regular references to the design being 'modern' or 'contemporary' very much in line with a Venice Charter based approach.
51. In Welwyn this means that a building like the Hoffman Le Roche building as modernist architecture is understood as offering a 'contemporary' reference to appropriate housing design as can be seen on p.53 of Heritage and Townscape Assessment in terms of scale, design, materials and the space between buildings. The Venice Charter based contrast is achieved "by offering a different material character so it acts as a notably different backdrop (unlike BioPark which was very similar in material character), and for Shredded Wheat by reducing and breaking up the mass, and offering a different elevational treatment, so that the forms no longer compete with the heritage asset in the skyline."
52. Welwyn's neo-Georgian residential housing, the Welwyn Stores building (1938-39) or the placemaking approach of the de Soissons master plan discussed above by contrast do not appear to have been considered in any meaningful way given the absence of any practical reference to them in the proposed design in text or visual material. This would be in keeping with Venice Charter based approach and assumptions.
53. Similarly architectural styles which are smaller scale and lower density, with human scaled massing and fine grain details of the place as shown in the residential architecture designed by de Soissons and other architects in WGC are equally not 'contemporary' because they reflect existing traditional design, again in line with the Charter's Article 9. This by implication suggests use of such designs on site would be considered to be copying the past and thus unacceptable.
54. It follows that the use of traditional materials such as wood, brick and ceramic tiles are not 'contemporary' in this sense, and are also seen as inappropriate. Certainly, the discussion of materials in the proposals does seem to reflect this view as although it proposes some use of brick it does so within much larger buildings than are core to local character. Similarly, it draws

what seems to be an untenable character parallel between roofs of two storey houses locally and those of the proposed much larger nine storey buildings.

55. This way of seeing architecture, heritage and townscape thus requires architecture and urban design which does not recognise or respond in a design sense to Welwyn Garden City's place identity and character context.
56. These can however be strongly represented through other submissions about the site. It is clear from these that to develop a place based on neo-Georgian built form and de Soissons masterplan's approach to garden city principles would reflect community aspirations for the site to be developed as contextual urban fabric.
57. To accept the validity of this approach would go against the implied but unacknowledged (perhaps unrecognised) ideological and place shaping position seen both in the proposals and the analysis of townscape and heritage.

4.4 Achieving appropriate character of housing

58. Although the site documentation says the proposals are in keeping with and sympathetic to the existing urban fabric in terms of proposed housing, the visual material and text presented demonstrates that this is not the case in a range of critical respects. These include scale, density, materials and connections to exterior space/private gardens.
59. The scale of the silos is not in my view a relevant reference for defining height or scale unless the development takes a modernist approach which is not in keeping with the predominant place character and identity of Welwyn.
60. The density proposed is far in excess of the level of housing density across the rest of the town so again does not relate successfully to it.
61. The materials proposed are not sympathetic to an otherwise coherent materials palette used in existing parts of Welwyn: wooden windows, brick walls and tiled roofs among other materials. This is an issue both in the immediate surroundings of the development where the Welwyn style of residential placemaking is the basis for the urban fabric, but also in the views issues outlined in other submissions (Gascoyne Cecil, May 2022).
62. The connections to exterior space are inadequate, again in conflict with garden city principles and the existing fabric context. Apartment balconies cannot be understood as analogous to private garden space or to shared food gardens close to home as claimed.
63. The proposals therefore do not fit with the Welwyn Hatfield District Plan, 2005 and policies in the submission draft Welwyn Hatfield Local Plan, 2016 or the adopted Broadwater Road Supplementary Planning Document (2015).

4.5 Achieving appropriate place character

64. Similar issues can be seen in relation to place character. At the place level, de Soissons produced a spacious Grand Avenue on a north-south axis as a Parkway in his masterplan and

this might be considered a relevant design contributor to character for any new development to the east of the train line which bisects the town.

65. Should a similar contrasting Avenue on a north-south axis be a master planning element for the remaking of the former industrial land it would provide a dramatic contrast to the informal, human scaled, green 'street pictures' that de Soissons aimed to produce in all Welwyn's residential streets after the approach outlined by the 19th century urbanist Camilo Sitte.
66. The proposed landscape elements show no connection to either the formal grandeur of the larger scale Parkway on which neo-Georgian buildings of the town centre are focused as a formal green space or to Welwyn's traditional residential street design focusing on clustered dwellings with private gardens, trees, hedges, and greenswards, creating "micro communities evocative of traditional English village greens which was much valued by residents".
67. The apparent lack of provision of foodspace, so critical to the garden city model, principles and placemaking, is a particularly unwelcome absence.
68. The design does not provide either the harmony or subtle variety of human scaled residential and townscape elements that were a feature of the de Soissons plan.

5. Conclusions

69. In my view the proposals as offered do not respect existing garden city character or townscape in key respects outlined above, causing specific problems related to addressing garden city principles, and the quality and impact of place design and housing for would-be residents, close neighbours and those further afield.
70. An alternative way forward, drawing on both direct garden city heritage principles and making use of wider sustainable urbanism possibilities would seem to be the following:
 - a. Due to its location close to the City's main transport hub this site is able to contribute to Welwyn's character as part of a transport-oriented development
 - b. This should at the same time be in line with requirements relating to respecting context, character and urban design principles set out in the National Planning Policy Framework (2021), the National Design Guide (2019) and make use of the National Model Design Code (2021) approach. It should take into account the points on character and context in the Living with Beauty report of the Building Better, Building Beautiful Commission (2020) and the advice provided by Historic England on designing new development in historic settings. In each case there is a very strong emphasis on respecting existing fabric character and replicating it rather than contrasting to or conflicting with it.
71. Focusing in on Hertfordshire's specific garden city related placemaking circumstances, the development would benefit from reflecting the Hertfordshire Guide to Growth's "urban village" model of development and the Guide shows a worked example of how such place retrofit can be accomplished in a similar Hertfordshire town context.

72. In terms of process to help maintain architectural and design integrity in line with its garden city patrimony it could make use of a pattern book and design code approach used successfully nearby in Hertfordshire and elsewhere.
73. An example would be Poundbury's Design and Community Code that helps maintain character coherence by drawing on the existing local housing and place lexicon. Some level of land value capture and long-term stewardship must be introduced into the proposal such as for example use of a Community Land Trust or similar.
74. At the level of housing, a more sympathetic approach would suggest making use of some modest and carefully configured increases to housing density to maximise the benefits of this transport-oriented location while also respecting and reflecting existing housing character in terms of density, height, materials, and direct links to gardens and green space including for food growing.
75. This should draw predominantly on the architectural and urban design heritage of Welwyn's residential fabric, and to a more minor degree could make use of models offered by its town centre buildings and buildings of value in the former industrial area.
76. Instead of a proposal including nine-storey buildings made up predominantly of apartments without gardens of which there are none elsewhere in the town more appropriate references for housing typologies, heights and scale would be from the City's own architectural heritage and existing character of low-density, low-rise neo-Georgian housing and the subtle green landscaping approach of de Soissons' original masterplan.
77. It could also benefit from insights such as 'missing middle housing' which show how medium density residential dwelling arrangements can be achieved at lower heights and densities than proposed here by interweaving attached and semi-detached dwellings of two to three stories in which each dwelling addresses the street, maintaining a traditional garden city residential character.
78. Similarly, the Prince's Foundation for Building Community's work on 'mid-rise solutions' such as the terraces that are sensitive to context and are no higher than three to five stories at most should be relevant to parts of the site which do not directly abut existing low-rise neighbours.
79. In these ways the proposed development can go some way toward a more successful, contextual approach that recognises and reflects local character. This would do more to meet garden city principles, reflect these more effectively through the character of its housing and place design, and do better to respond to community and other stakeholder aspirations for this critical site.