

# **Proof of evidence in relation urban design matters**

**Dr. Stefan Kruczkowski BA(Hons) DipTP RPUD FHEA**

**for Hart District Council**

19/02659/FUL, Police Station, 13 Crookham Road, Fleet.

Demolition of existing building and redevelopment of the site to form 31 retirement apartments including communal facilities, retention of existing access, car parking and landscaping.

	<b>Section</b>	<b>Page</b>
<b>1.0</b>	<b>Part One: Introduction</b>	<b>2</b>
<b>2.0</b>	<b>Part Two: The development proposals and design rationale</b>	<b>6</b>
<b>3.0</b>	<b>Part Three: Summary and conclusions</b>	<b>23</b>
	<b>Appendices</b>	<b>26</b>

## 1.0 Part One: Introduction

- 1.1 My name is Dr. Stefan Kruczkowski. I am a Recognised Practitioner in Urban Design, a designation awarded by the Urban Design Group based on qualifications, experience and professional practice in urban design.

I was one of the first urban design practitioners in the country to receive this professional recognition from the Urban Design Group.

- 1.2 I possess undergraduate and post graduate qualifications in town planning and urban design, these include a doctorate in urban design:

Graduate School, Nottingham Trent University  
2018, Doctor of Philosophy (Urban Design).

Institute of Urban Planning, University of Nottingham  
2001, Diploma in Town Planning (Urban Design).  
2000, BA (Hons.) Urban Planning and Management (Urban Design).

- 1.3 I have been owner and director of Urban Design Doctor Limited since establishing the company in 2017. My limited company grew from my original sole trader business (Stefan Kruczkowski Urban Design) that was formed in 2008.

- 1.4 In 2008, I worked four days per week as Principal Urban Designer at North West Leicestershire District Council and spent one day per week undertaking freelance work following my appointment as an Enabler within the Urban Design and Homes Team at the Commission for Architecture and the Built Environment.

My freelance work gradually increased and in 2017, I left paid employment and established my limited company.

I specialise in providing urban design support to local planning authorities and to Homes England (government agency). I also undertake limited work for private sector developers.

- 1.5 My career has been largely based in the public sector with over a decade of local government experience working within development management and planning policy teams as an urban designer officer.

I have extensive experience of urban design matters on a wide range of applications in a broad variety of contexts (built/natural environment, social and economic).

- 1.6 I have worked for or offered urban design support to the following local planning authorities since 2007:

Blaby District Council, Buckinghamshire Council (former Chiltern and South Bucks Districts), Cheshire East Council, Cornwall Council, Derby City Council, East Lindsay District Council, Harborough District Council, Hart District Council, Mansfield District Council, Newark and Sherwood District Council, North East Derbyshire District Council, North Northamptonshire Joint Planning and Delivery Unit, North West Leicestershire District Council, Nottingham City Council, Poole Borough Council, Rushcliffe Borough Council, Rutland County Council, South Derbyshire District Council and Wigan Metropolitan Council.

- 1.7 I am co-author of Building for Life 12. Originally published in 2012, subsequent editions were published in 2014, 2015 and 2018 including a version for the Welsh Government in 2017: 'Adeliladu am Oes 12 Cymru: Arwydd o le da I fyw ynndo'.

I have used the Building for Life methodology for 12 years and have conducted pre-completion and post-completion Building for Life based assessments of residential developments across England in a wide variety of contexts.

- 1.8 In 2019/20, I co-authored the latest update of the Building for Life methodology; Building for a Healthy Life. Endorsed by Homes England, the Home Builders Federation, Design Network and the Urban Design Group, Building for a Healthy Life was written in partnership with NHS England and with the involvement of the Ministry of Housing, Communities and Local Government.

The methodology is a proven design tool for structuring discussions relating to the design quality of residential led developments, informing local authority decision making and securing design quality consistent with the requirements of the National Planning Policy Framework and the National Design Guide.

Building for Life 12 and my contribution to its creation is acknowledged in the NPPF (2019). Building for a Healthy Life and my contribution to its creation is acknowledged in the proposed revised NPPF (2021).

- 1.9 I serve on design review panels for Design Midlands, Design West and advise Homes England on the design quality of proposed developments on land owned by the agency or seeking financial support from the agency. I am well regarded by Homes England for providing objective and robust design advice and critiques.

- 1.10 I have served a fixed term as External Examiner at Anglia Ruskin University (MSc. Urban Design) having been appointed by its Senate on the basis of my academic credentials and practice.

I am visiting lecturer at the University of Nottingham's School of Architecture, Design and the Built Environment and previously worked as a Lecturer at Nottingham Trent University leading the PG Cert Planning, Urban Design and Sustainable Development course that I created. The course was endorsed by the Urban Design Group.

I am a Fellow of the Higher Education Academy.

1.11 I regularly deliver urban design training and talks. Recent talks have been offered to the Royal Town Planning Institute, East Midlands Councils, Urban Design London and urban design training to councillors of Hart District Council and North Northants Joint Planning Committee.

1.12 I am a Design Council Built Environment Expert. I served as a CABE Enabler from 2008 until the dissolution of CABE in 2011 following the government's Comprehensive Spending Review.

1.13 Within CABE I was responsible for offering urban design support and Building for Life advice to local authorities and developers across England.

I was also part of a small expert team assessing the design quality of housing schemes seeking funding from the (then) Homes and Communities Agency's £1.06bn Kickstart fiscal stimulus programme following the global credit crisis in 2007.

Kickstart assessors were selected by CABE on the basis of their skills in robustly critiquing developments seeking grant funding using the Building for Life methodology.

1.14 I also contributed towards the delivery of CABE's Urban Design Summer Schools helping to train young urban designers and planners to better understand and apply urban design thinking and principles.

1.15 In 2018, I was awarded a PhD for my research into the effectiveness of Building for Life 12 as a regulatory mechanism in development management practice.

This was the first doctorate awarded based on Building for Life 12. My empirical research was based on the use of the Building for Life methodology on developments comprising of over 15,000 homes. The PhD recognises that I have made an original contribution to knowledge within the field of urban design.

1.16 In 2021, Homes England will publish 'Streets for a Healthy Life' – a companion guide to Building for a Healthy Life. I was part of the expert advisory panel that supported Homes England and their consultants in producing this urban design publication.

1.17 In 2019 I was commissioned to provide urban design advice to Hart District Council for a strategic housing development within the District.

Since then, my involvement with the Council has increased and I have been increasingly consulted on other planning applications whilst also offering urban

design training to officers. I was requested to comment on this planning application in October 2020.

### **Scope of the proof**

- 1.18 I am instructed by Hart District Council to prepare evidence in support of the design-related reasons for refusal of 19/02659/FUL, Police Station, 13 Crookham Road, Fleet.

This proof does not deal with other reasons for refusal, matters that are being dealt with by other representatives on behalf of the Council and questions relating to these matter should be directed at these representative.

### **Declaration**

- 1.19 The evidence presented in this proof is what I understand to be true and has been prepared having considered all the information available to me at the time of writing whilst drawing upon my professional and specialist urban design skills, knowledge and experience.

The comments offered here are my professional opinion, informed by my understanding of best and good practice in the field of urban design.

### **Structure of statement**

- 1.20 The remainder of this proof of evidence is structured as follows:

Part 2 describes the development proposals, the evidence presented by the appellant concerning the design rationale and the degree to which the proposals respond to national and local design policies.

Part 3 offers a summary and conclusion.

## Part Two: The development proposals

### Description of proposed development

- 2.1 The Committee report provided a summary of the proposals.
- “The application seeks full planning permission for the demolition of the existing buildings and redevelopment of the site to form 31 retirement apartments including communal facilities, retention of the existing access, car parking and landscaping.*
- The proposed apartments would consist of x19 one-bedroom apartments and x12 two- bedroom apartments. These would be supported by communal facilities including a one- bedroom guest suite, lobby, residents lounge and rear garden. The development would fall within Use Class C3 (Dwellingshouses).”*
- 2.2 The proposed building is three stories high with a principal elevation facing Crookham Road characterised by three large gables. The symmetrical elevation uses a mix of hipped and gabled roof elements that hide the presence of flat and crown roof elements. Elevations are largely brick faced with some use of render. Juliette balconies and dormer windows are also used.
- 2.3 Gardens are proposed to the north-eastern corner of the site with a car park, waste storage and vehicle circulation space provided to the south and south western side of the site.
- 2.4 Internally the building is largely comprised of apartments with self-contained kitchen and bathroom facilities. An “owners lounge”, coffee bar and reception is located adjacent to the main entrance that is located towards the southern corner of the building.
- 2.5 The proposed development is intended for people aged 60 years and over (or those of 60 years and over with a spouse or partner of at least 55) can live in the development.
- 2.6 Occupants are expected to benefit from communal facilities although the facility is intended for those not requiring intensive medical or other assisted living services. As such, residents can be expected to be reasonably if not completely independent. An important consideration in later arguments I will offer in relation to the design of the Crookham Road elevation.
- 2.7 I was consulted on the application in October 2020 and raised a number of design concerns (please refer to Appendix A). The Council considered my advice and concluded that there were justified reasons for refusal on design grounds.
- 2.8 The Committee report stated that,

*“In terms of the size of the proposed dwellings, the one-bedroom flats would be between 51.2sqm – 66.8sqm and the two-bedroom flats between 73.5sqm – 91.4sqm. All flats would meet or exceed the relevant requirements of the Government’s Technical Housing Standards – Nationally Described Space Standard. The proposal therefore complies with HLP32 Policy H6.”*

The report also considered design in relation to existing residential amenity, concluding that, *“the proposed development would not result in a material loss of amenity to neighbouring residential properties and would meet the requirements of HLP06 saved policy GEN1(iii) and the NPPF (para 127(f)) in this regard.”*

2.9 However, a number of reasons for design refusal were cited:  
*“By virtue of the proposed layout, massing and appearance, the proposed development would not achieve a high-quality design, positively contribute to the overall appearance of the area or be keeping with local character. As such, the proposal is contrary to Policy NBE9 of the Hart Local Plan (Strategy and Sites) 2032, Saved Policy GEN1 of the Hart Local Plan (Replacement) 1996-2006, Policy 10 of the Fleet Neighbourhood Plan and the aims of the National Planning Policy Framework.”*

2.10 Therefore the outstanding matters of design concern relate to the quality of the proposed urban design response, specifically the relationship between the proposed development and its context.

This will be the focus of my proof of evidence.

2.11 These can be grouped into two distinct issues that will be critiqued and the main focus of my evidence:

- The degree of active elevation to Crookham Road.
- Local character.

However, in the first instance it is necessary to understand how the design proposals evolved by exploring the design rationale set out in the appellant’s Design and Access Statement.

### **Design rationale**

2.12 The appellant seeks full planning permission. The Design and Access Statement seeks to explain and justify the design thinking behind the proposals.

2.13 The appellant highlights the community benefits provided by retirement housing: these being social benefits, economic benefits and environmental benefits (p.4).

These benefits reflect the three overarching objectives of the planning system cited in the National Planning Policy Framework (Paragraph 8). One of these three

objectives is environmental with development contributing “to protecting and enhancing our natural, built and historic environment”. The application of good urban design practice and principles is critical to the ability of development to contribute towards the environmental objectives of the planning system.

- 2.14 Good practice guidance for Design and Access Statements<sup>1</sup> highlights their importance as part of planning applications in explaining and justifying the design thinking and the evolution of development proposals through four stages:
- Assessment.
  - Involvement.
  - Evaluation.
  - Design.

These stages should clearly demonstrate, “how the physical characteristics of the scheme have been informed by a rigorous process” (CABE, 2006, p.7).

- 2.15 The following section of the report considers the robustness of the Design and Access Statement against these four stages.

#### **Assessment**

- 2.16 *“The applicant should be able to clearly demonstrate through the statement that they have addressed the context of the site and its surroundings... as well as any existing planning policies... planning policy context means what policies and guidance exist to affect the shape of the development of the site” (CABE, 2006, p.22).*

- 2.17 I shall begin with the planning policy context (design) and other material planning considerations (design).

The Design and Access Statement identifies local policies that were in place at the time of submission of the planning application. However reference to relevant design policies are limited. Policies are in place that relate to the design qualities of well-designed developments. My critique discussed to what extent the proposals are consistent with these policies and where there are deficiencies in the development proposals.

- 2.18 Relevant policies within the NPPF are as follows:

- 2.19 *91a. promote social interaction... and active street frontages.*

- 2.20 *124. The creation of high quality building and places is fundamental to what the planning and development process should achieve.*

---

<sup>1</sup> (CABE (2006) Design and Access Statements: How to write, read and use them, London.

- 2.21 127. ... decisions should ensure that developments:
- 2.22 127a. will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
- 2.23 127c. are sympathetic to local character and history;
- 2.24 127d. establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit.
- 2.25 127f. create places that are safe, inclusive and accessible... where crime and disorder, and the fear of crime, do not undermine the quality of life.
- 2.26 130. Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.
- 2.27 Other material considerations are the National Planning Practice Guidance, National Design Guide (2019) and Building for a Healthy Life (2020).

**National Planning Practice Guidance**

- 2.28 Refers to a range of design tools available to local planning authorities and developers, “to guide the design of developments to ensure that the final product is of good quality” that include the National Design Guide and assessment frameworks (such as Building for Life).

**National Design Guide (2019)**

- 2.29 The NDG identifies ten characteristics of successful places.
- 2.30 The first of these characteristics is context. The NDG states that, “well-designed places are... integrated into their surroundings so they relate well to them” (40).
- 2.31 It continues to state, “well-designed new development is integrated into its surroundings, physically, socially and visually. It is carefully sited and designed...” (43).
- 2.32 The importance of street to building relationships is highlighted in Paragraph 69, “with successful streets characterised by buildings facing the street to provide interest, overlooking and active frontages at ground level”. This is further reinforced in Paragraph 100 that refers to public spaces “that feel safe, secure and attractive”.

### **Building for a Healthy Life (2020)**

- 2.33 Building for a Healthy Life is a design methodology written to support better designed residential developments. Whilst it is usually used for larger scale residential developments, the 12 considerations are based upon urban design principles and good practice.

The considerations that are relevant to these development proposals are:

- Making the most of what is there.
- A memorable character.
- Well defined streets and spaces.

### **Government and design quality**

- 2.34 The government is placing an increasing emphasis on design quality in the planning system. This has been evidenced in recent years by the work of the Building Better, Building Beautiful Commission<sup>2</sup>, the publication of the National Design Guide (2019), the current consultation on proposed modifications to the NPPF (2021) and the publication of the National Model Design Code.

The government has also announced proposals to establish an Office for Place. This represents a significant shift in the government's focus on design quality. The establishment of the Office for Place will be the first time government has committed to funding a body with a remit for raising design quality since the abolition of the Commission for Architecture and the Built Environment in 2011.

### **Local policies:**

#### **Hart Local Plan (Strategy and Sites) 2032**

- 2.35 The relevant design policy is NbE9 Design that requires, *“all developments should seek to achieve a high quality design and positively contribute to the overall appearance of the local area”*.

The policy continues to state that,

*“Development will be supported where it would meet the following relevant criteria:*

- 2.36 - *it promotes, reflects and incorporates the distinctive qualities of its surroundings in terms of the proposed scale, density, mass and height of development and choice of building materials. innovative building designs will be supported provided that they are sensitive to their surroundings and help to improve the quality of the townscape or landscape;*

---

<sup>2</sup> Building Better, Building Beautiful Commission (2020) Living with Beauty, London.

2.37 - *it provides or positively contributes to public spaces and access routes and public rights of way that are attractive, safe and inclusive for all users, including families, disabled people and the elderly;*

2.38 - *the design of external spaces (such as highways, parking areas, gardens and areas of open space) should be designed to reduce the opportunities for crime and anti-social behaviour and facilitates the safe use of these areas by future residents, service providers or visitors, according to their intended function."*

**Hart Local Plan (Replacement) 1996 - 2006**

2.39 Saved Policy GEN1 requires development that is, *"in keeping with the local character by virtue of their scale, design, massing, height, prominence, materials, layout, landscaping, siting and density."*

2.40 **Fleet Neighbourhood Plan** Policy 10 requires that,

*"Development shall complement and be well integrated with neighbouring properties in the immediate locality in terms of scale, density, massing, separation, layout, materials and access;*

2.41 *Architectural design shall reflect high quality local design references in both the natural and built environment and reflect and reinforce local distinctiveness;*

2.42 *The height of new buildings shall be in keeping with neighbouring properties and roofscapes shall be well articulated to avoid bulky, featureless appearance. Applicants shall respect neighbouring buildings and demonstrate how heights of development will not be over-bearing or dominant in the existing street scene;*

2.43 *Parking on development sites shall be well integrated so as not to dominate the public realm and shall adhere to Hart District Council's adopted parking standard or guidelines".*

2.44 **Urban Character and Design Study**

Key policy considerations are set out in Fleet Town Centre Appendix 1. The study provides useful points of reference to applicants with respect to buildings that positively and negatively contribute towards townscape quality. The Study enables applicants to gain a greater appreciation and understanding of the context; and the required qualities of contextually responsive design proposals.

**Contextual understanding and analysis**

2.45 The Design and Access Statement begins (after introductory sections) by offering a photographic survey of the wider context of the proposed development site (page 8).

The illustrations convey the “*eclectic*” architectural character of the area. Although this is correct, there are buildings in the area that are more distinctive and less generic in appearance (see photo montage labelled ‘A’, page 8). These, if identified, can provide cues for new development.

The survey offers photographs of various buildings, referencing “*heavier Modernist and Brutalist development*”. However, the Statement stops short of any further discussion and analysis of the impact of these types of development on the quality of the built environment, in particular the quality of streets and public spaces around these buildings.

- 2.46 Whilst the Statement identifies materials that are characteristic of the area, such as “*concrete and clay tiled*” roofs and, “*the use of gables and gabled features*”, these observations are limited in their scope. Materials and architectural details are important aspects of development quality, although the National Design Guide reminds us that there are other aspects of design that contribute towards creating buildings, streets and spaces with a distinctive and more memorable character.

This is recognised in the National Design Guide which states that , “*a place is more complex and multi-faceted than a building*” (Paragraph 5).

The National Design Guide also states that, “*a well-designed place is unlikely to be achieved by focusing only on the appearance, materials and detailing of buildings. It comes about through making the right choices at all levels*” (Paragraph 21).

The Guide specifies components, these being: layout, form, scale, appearance, landscape and materials (Paragraphs 23 to 30).

- 2.47 The absence of critical analysis is further underlined in the photographic study that follows on page 8 of the Design and Access Statement. Without critical analysis it is not possible to robustly identify and understand, “*the opportunities available for improving the character and quality of an area and the way it functions*” (130).

- 2.48 Eight photographs are offered within the opening part of the photographic study (Design and Access Statement, page 8). The reasoning for selecting and including these images in the Design and Access Statement is not entirely clear. What is appellant suggesting through their inclusion in the document? Are these sources of reference that exhibit qualities that should be replicated or avoided in any new development?

Without such critical analysis it is not possible to identify how development can be made to be, “*in keeping with the local character by virtue of their scale, design, massing, height, prominence, materials, layout, landscaping, siting and density*” (Saved Policy GEN1).

- 2.49 There are important urban design differences between these eight images that affect the quality of the streets and public spaces around the buildings. The buildings also differ in their contribution to reinforcing local distinctiveness.

Critically, 5 of the 8 photographs show buildings that reflect poor or negative urban design by virtue of their:

- Lack of distinctive or otherwise memorable architectural character.
- Weak relationship with the public realm where buildings either offer a dead or largely inactive elevation to the street at ground floor level.

- 2.50 Whilst a number of these photographs illustrate to varying degrees the use of locally appropriate/referenced materials and details which can help to reinforce local identity, sources of distinctive local character are also reflected in the scale, height and massing (Saved Policy GEN1).

- 2.51 There are also deeper variations between the photographs that can be divided into two categories:

- buildings that have a positive (and active) relationship with the street and,
- buildings that have a less positive (and less active) relationship with the street.

These variations help us to differentiate between well-designed and less well-designed buildings (see National Design Guide, Paragraphs 5, 21, 23-30).

Without contextually appropriate building layouts, building to street relationships and building forms, design responses are at best abstract in their response to place. Materials and details cannot compensate for more fundamental design weaknesses.

- 2.52 To reinforce this point, in order to *“take the opportunities available for improving the character and quality of an area and the way it functions”* (NPPF, Paragraph 130), it follows that it is critical to identify and understand where development that forms part of the urban fabric in an area has failed to improve the character and quality of an area; and the way it functions.

That these have not been identified and their impact on the quality of the built environment is not fully appreciated by the appellant undermines the ability of the scheme’s designers to avoid the same pitfalls and offer a more appropriate and necessary urban design response.

- 2.53 Buildings that have a positive and active relationship with the street possess two key qualities:

1. Close proximity to the edge of the street (back of or close to back of pavement);
2. Active frontages, these being ground floor elevations that have a positive relationship with the street by virtue of the high frequency of visually permeable windows and entrance doors.

2.54 The importance of active frontages is recognised in the NPPF (91a; 127f; 130), National Design Guide (40; 43; 69) and Building for a Healthy Life.

Building for a Healthy Life requires “*streets with active frontages... front doors that face streets and public spaces... apartments that offer frequent front doors to the street*” (2020, p.53).

2.55 The strength of active frontages is therefore more than having buildings facing the right way, i.e. towards rather than away from streets and other public spaces.

Instead active frontages are reliant on reinforcing this physical relationship with building uses that offer higher levels of activity, helping to support street activity or allow those passing by to see activity within.

2.56 Uses such as shops or other commercial and social uses contribute more positively to the street at ground floor level compared to more private spaces such as living accommodation<sup>3</sup>. Where living accommodation is used at ground level facing the public realm, it will be more advantageous to urban design quality (street vitality and natural surveillance opportunities) to have rooms such as living spaces and kitchens, as opposed to bathrooms and bedrooms.

2.57 Active frontages are also made by frequent entrances to the street. As illustrated in the illustration overleaf, the fewer entrances and the lesser the activity, the more inactive a building to street relationship becomes.

---

<sup>3</sup> MacCormac (1983) Urban Reform: MacCormac’s Manifesto, Architects Journal, 15 June 1983, p.59-72; also see Bentley et al. (1983) Responsive Environments, Oxford.

A		<b>Table 5.3 Active frontage guidelines</b> <b>Grade A frontage</b> <ul style="list-style-type: none"> <li>• More than 15 premises every 100m</li> <li>• More than 25 doors and windows every 100m</li> <li>• A large range of functions</li> </ul>	<ul style="list-style-type: none"> <li>• No blind facades and few passive ones</li> <li>• Much depth and relief in the building surface</li> <li>• High quality materials and refined details</li> </ul>		
	<b>Quincy Market, Boston, USA: A 100% active location</b> 			<b>Grade B frontage</b> <ul style="list-style-type: none"> <li>• 10 to 15 premises every 100m</li> <li>• More than 15 doors and windows every 100m</li> <li>• A moderate range of functions</li> </ul>	<ul style="list-style-type: none"> <li>• A few blind or passive facades</li> <li>• Some depth and modelling in the building surface</li> <li>• Good quality materials and refined details</li> </ul>
	<b>Poundbury, Dorset: Frequent doors and windows onto the street</b> 			<b>Grade C frontage</b> <ul style="list-style-type: none"> <li>• 6 to 10 premises every 100m</li> <li>• Some range of functions</li> <li>• Less than half blind or passive facades</li> </ul>	<ul style="list-style-type: none"> <li>• Very little depth and modelling in the building surface</li> <li>• Standard materials and few details</li> </ul>
B		<b>Grade D frontage</b> <ul style="list-style-type: none"> <li>• 3 to 5 premises every 100m</li> <li>• Little or no range of functions</li> <li>• Predominantly blind or passive facades</li> </ul>	<ul style="list-style-type: none"> <li>• Flat building surfaces</li> <li>• Few or no details</li> </ul>		
C		<b>Grade E frontage</b> <ul style="list-style-type: none"> <li>• 1 or 2 premises every 100m</li> <li>• No range of functions</li> <li>• Predominantly blind or passive facades</li> </ul>	<ul style="list-style-type: none"> <li>• Flat building surfaces</li> <li>• No details and nothing to look at</li> </ul>		
D					
E					

Exposing blank walls to the public realm should be avoided

Adapted from Gehl, 1994

Source: English Partnerships and the Housing Corporation (2000) *Urban Design Compendium 1*, London.

In this context, it would not be unreasonable to expect a Grade B quality frontage to be achieved.

2.58 Photographs 1, 3 and 4 are examples of buildings that have a positive street relationships whereas 2, 5 to 8 illustrate buildings with less positive interfaces with the street.

2.59 Photograph 5 (location) shows a building with a negative (dead and inactive) interface with the street by virtue of the largely solid ground floor masonry walls that face onto streets and other parts of the public realm. Whilst photograph 7 (location) shows a building with balconies above ground floor that positively contribute towards the relationship between the building and the street, the building offers a limited and weak interface with the street at ground floor.

The ground floor is the primary and most important interface between buildings and the street because it is at the human scale – this being the level at which we experience streets, buildings and spaces.

2.60 The failure of the Design and Access Statement to identify and analysis at a basic level the importance of building to street relationships is a critical weakness in the formulation of the design response. It reflects the weakness of the appellant's contextual analysis and appreciation, critical elements of settlement structure and urban design quality.

The failure of the appellant to identify urban design principles is reinforced as the Design and Access Statement progresses. On page 9 a photographic survey of the

site context is offered. The scope of analysis and critical thought is limited if not absent.

- 2.61 Whilst it does describe and show the context, it fails to identify the positive and negative attributes of the place and in turn, how new development could contribute positively to its setting.

Again, why are buildings shown and what is being drawn from these? Are these to be replicated or avoided? If so, for what reasons? A number of buildings are generic in appearance and contribute little towards reinforcing local identity. For instance, page 12 shows abstract building details, however the way you arrange a building's façade is a key part of its overall success and convincingness.

- 2.62 Design cues are limited to shallower expressions of design quality such as brick types, use of render, window types, cill design and roofing materials. Whilst these might inform contextually appropriate materials they are not the fundamental qualities of successful buildings, streets and spaces and distinctive places. The critical building blocks of successful and memorable places runs deeper.

- 2.63 A simple audit was required to identify buildings of a similar scale and relatable typology that contribute positively to the identity of the town; and then explore how this might be interpreted in either a contemporary or traditional style. Such an audit would be usefully informed by the study cited in Paragraph 2.44.

- 2.64 In conclusion, the assessment stage of the design process illustrates a number of fundamental weaknesses.

### **Involvement**

- 2.65 Applicants are encouraged to, *“carry out professional consultations and community involvement at the earliest possible stage as this will help to avoid the potential pitfalls of not doing so until it is too late to change the scheme”* (CABE, 2006, p.12). This is reinforced in the NPPF Paragraph 128.

- 2.66 The Design and Access Statement details the efforts made to engage with the local community, detailing the concerns and comments expressed at a public consultation event.

- 2.67 Whilst it is noted that the applicant did seek comments from the council prior to submission this in itself does not provide a justification for the weaknesses in the design quality of the submitted proposals.

- 2.68 It is important to recognise that the reasons for design refusal relate to basic principles of urban design, specifically ensuring buildings relate positively to the streets and spaces they need to have a relationship with; and creating developments that reinforce local identity. These are principles that are not

specific to this particular planning authority but instead well established in current and former national planning policy as well as good practice guidance.

### **Evaluation**

2.69 *“Once the site’s context has been properly addressed... identifying options for development should be a fairly simple task... evaluate the information collected in the previous two stages and identify opportunities and constraints that will inform the scheme. Evaluation many involve resolving any conflicting issues...”* (CABE, 2006, p.12)

2.70 A number of constraints are listed in the Design and Access Statement.

I consider these to be generally robust particularly the reference to the position of the existing building that the appellant states as *“weaken[ing] the line of the frontage off Crookham Road by being stepped a way back from the footway”* (p.17).

I therefore consider it appropriate and relevant for the following page of the Design and Access Statement that considers the opportunities to refer to, *“the new building can present a more active frontage to Crookham Road”* .

2.71 A second constraint I consider important to note is the *“level difference of approximately 2.0m between Crookham Road and St. James Road, fall running north-west to south-east”*.

This level change is both a constraint and an opportunity that requires careful resolution to create a building that offers a strong and active frontage to Crookham Road. In practice, this would most likely require a split floorplate at ground floor level.

2.72 Further opportunities are presented in the Design and Access Statement. I consider that not all of these are fully consistent with urban design policies and good urban design practice in this context.

For instance, whilst I consider that, *“the building can present a more active frontage to Crookham Road”* and *“moving the building line forward will strengthen the urban line established”* to be robust design principles for this development, the strength of the building’s active frontage is compromised by *“a new boundary **separating** the proposed development from the footway”* (my emphasis where text is bold).

The strength of this building to street relationship is also compromised by the degree of building set back and it is not clear why a setback appears to have been determined at a relatively early stage in the evolution of the design proposals; and

why options for this critical interface were not explored in both plan and cross section.

- 2.73 Whilst in some contexts and forms of development a greater set back can be appropriate, in this context “*a more active frontage to Crookham Road*” (Design and Access Statement, p.18) necessitates a more modest set back, ground floor uses, a ground floor level with the pavement and frequent building entrances that would be mutually reinforcing in animating the edge of the street.
- 2.74 The development borders a transition part of the town however the proposed scale and form of development is more urban than suburban in character; and therefore more urban interpretations and applications of active frontages need to be applied. Please refer back to Paragraph 2.57 (Grade B frontage).
- 2.75 Stronger principles (opportunities) needed to be identified to underpin the relationship between the development and Crookham Road and be expressed as follows:
- Create a Grade B (minimum) frontage through:
  - Ground floor of building to be level with the pavement along Crookham Road.
  - Main entrance to building to be located to face Crookham Road.
  - Animate ground floor through individual front doors to apartments facing Crookham Road.
  - Use balconies above ground floor to create a less dominant building mass and reinforce the active frontage at street level.
  - Explore internal arrangement of spaces to position rooms that generate more activity and interest along the Crookham Road and St. James Road elevations.
- 2.76 A principle that is noticeable by its absence is one relating to local identity. A principle to this effect was required to ensure that development proposals responded to the local and national policies relating to local character, whilst also taking the opportunities that exist to create a development that adds to elements of the townscape that exhibit a distinctive identity.
- 2.77 Finally, it is good practice to explore development options before progressing to detailed design. However, only a single option was presented in the Design and Access Statement; that being the submitted proposals.
- 2.78 In conclusion, the evaluation stage of the design process as evidenced by the content of the Design and Access Statement illustrates a number of weaknesses.

## Design

- 2.79 In this section the urban design qualities of the proposals shall be critiqued in two parts: i). the relationship between the building and the public realm and, ii). the contribution the development makes to local character.

### **The relationship between the building and the public realm**

- 2.80 Drawings D1.2 Proposed site plan, D1.3 Proposed ground floor plan, D1.9 Proposed elevation C (see sectional elevation), D1.10 Proposed elevation D (see sectional elevation) and D1.16 Soft landscaping strategy illustrate the disconnect between the building and Crookham Road (and to a lesser extent St. James Close) by virtue of:
- 2.81 The absence of an entrance doors to individual ground floor apartments and a shared door to provide access into the building.
- 2.82 The ground floor plate of the building sitting at a lower level than Crookham Road.
- 2.83 The use of a boundary treatment that further disconnects the building from the street edge.
- 2.84 A building set back (c.5m) that further removes and detaches the building from the street edge.
- 2.85 Positive aspects of the scheme are that the car parking is located away from the street edge. Car parks commonly create a severance effect between buildings and street edges when they are located along building frontages.

The Fleet Neighbourhood Plan (Policy 10) requires parking to be *“well integrated so as to not dominate the public realm”* and the scheme responds positively to this particular part of the policy.

- 2.86 A further positive aspect is illustrated in the urban grain illustration offered within the Design and Access Statement (page 13) that shows the building moving to a location that is closer to the street than the current building.
- 2.87 However, as previously discussed simply placing a building closer to the street does not make an active elevation as required by policy.

This divorce from the street also limits the safety of streets by limiting natural surveillance opportunities over the public realm from internal spaces within buildings (NPPF, Paragraph 127f).

- 2.88 It is therefore reasonable and justified in my professional opinion to conclude that the proposals do not offer an active and positive relationship with the street; they are not consistent with:

### **National Planning Policy Framework**

- 2.89 91a (active street frontages), 124 (high quality buildings and places), 127a (function well), 127d (attractive, welcoming places), 127f (safe). This is one of the most important opportunities associated with developing this site, as such the proposals are also not consistent with NPPF 130.

### **National Design Guide**

- 2.90 Paragraph 69 that requires buildings to face to street, providing overlooking and active frontages.

### **Building for a Healthy Life**

- 2.91 Requires developments to offer active frontages (2020, p.50) with front doors to the street (p.53).
- 2.92 The provision of largely inactive relationship with the street is not a high quality design response, therefore inconsistent with NBE9 as well as the other aforementioned policies.

### **Contribution to local character**

- 2.93 Without identifying buildings that positively or negatively contribute towards local identity is it not possible to design buildings that respond positively sources of distinctive local character.

The NPPF requires developments to be sympathetic to local character (Paragraph 127c) and establish a strong sense of place (127d). This is reinforced by the National Design Guide that refers to the integration of buildings and their surroundings (43).

- 2.94 Building for a Healthy Life encourages development to draw on sources of local inspiration whilst also *“exploring conceptual ideas before settling on an agreed way forward”* (2020, p.38) and the need to *“create a place with a locally inspired or otherwise distinctive character...Review the wider areas for sources of inspiration...delve deeper than architectural styles and details. Where the local context is poor or generic, do not use this as justification for more of the same... building form, massing and materials often underpin the essence of the distinctive character of settlements rather than architectural style and details”* (p.44).
- 2.95 Whilst the Urban Grain analysis offered on page 13 of the Design and Access Statement shows the closer proximity between the building and Crookham Road when compared with the existing building, the depth of the building is substantially deeper (17-20m) than the more established parts of the urban grain.

The lack of option testing means it is not clear whether there are alternative layout forms that could create a building that better relates to positive elements of the urban grain; stitching into the fabric more sensitively.

2.96 The architectural approach draws reference from Old Dairy Court and Grace Gardens which are not buildings that I would consider define or reinforce positive local identity. Indeed, the rationale for introducing street facing gables is largely justified on the basis of *“respond[ing] to the trend of modern flattened development in Fleet”* (Design and Access Statement, page 21).

2.97 The resultant building form is proposed to be faced in stock bricks, render, slate effect tiles and UPVC windows and fascias.

Had cues been taken from buildings of a similar height, architectural references could have been drawn and embedded into the elevational design and detail of the building.

For instance, the largely singular mass of the Crookham Road frontage could have been divided into smaller sections, reflecting the more established plot rhythm of buildings seen within the area that contribute positively to the identity of the place. This could then have been progressed further with a non-hipped roof structure alongside windows that create a better balance between solid to void on this important elevation.

Further consideration could then be afforded to expressing the roofscape before layering this with details that afford visual interest and draw local reference. As such, smaller clay or slate tiles, windows with a strong vertical emphasis, deep reveals and strong headers and sills; perhaps with some hanging tiles and overhanging bays. This might result in a more traditional interpretation of character but it would be equally possible to reflect characteristics in a contemporary style. Combined with the ground floor interface that has been discussed at great length, a more responsive development would have been achieved.

2.98 Instead, the submitted elevations show a largely unexpressive and monolithic building form that replicates many past development that have offered little positive contribution to local identity. The proposed building is *“bulky, featureless... dominant”*. If these matters were resolved, it would potentially be possible to create a development whereby the variation in urban grain could be balanced by a building that otherwise integrates more sensitively into its context.

2.99 It is therefore reasonable and justified in my professional opinion to conclude that the proposals do not comply with the Hart Local Plan 2032 Policy NBE9 that requires development to, *“reflect and incorporate the distinctive qualities of its surroundings”*; as well as those contained with the NPPF, Fleet Neighbourhood

Plan and The Urban Character and Design Study. These policies are further reinforced the National Design Guide and Building for a Healthy Life.

### 3.0 Part Three: Summary and conclusions

3.1 It is my professional opinion that the proposed design response is not reflective of good urban design practice; and is not consistent with national and local policies relating to urban design quality specifically those relating to local character and active frontages.

3.2 The NPPF states that, *“Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions”* (Paragraph 130).

3.3 Good design is dependent on good design processes, taking the time and effort to understand a place, identify areas of weakness and strength, in turn informing the design response, i.e. what good looks like in a specific context.

3.4 The discussion focused on the Design and Access Statement highlights key weaknesses in three of the four structural sections:

- Assessment.
- Evaluation.
- Design.

3.5 The assessment stage is akin to the foundations of a building. If these foundations are not robust, weaknesses will appear elsewhere.

It is my opinion that the failure of the appellant to complete a robust assessment of the context; combining this with a critical appraisal with urban design policies and good practice in order to inform the requirements of the design response (evaluation) undermined the ultimate success of the development proposals.

3.6 Key opportunities in this location can be summarised as follows:

- Enlivening the Crookham Road elevation;
- Create active frontages with the streets the development has an interface with.

3.7 This required a design response that offered at the very least a building that met the level of the pavement along Crookham Road and the provision of frequent front doors to the street that could have been integrated into the proposals for ground floor apartments.

As stated in Paragraphs 2.5 and 2.6 those living in the proposed development are largely if not completely independent. Therefore ground floor apartments could

have been designed to have direct street access as well as access into internal circulation spaces to provide direct access to communal areas.

- 3.8 Whilst some degree of setback would have been required to accord with typical stand-off distances from the edge of the public highway, a modest set back of 1-2m would be appropriate in this more urban, town centre context.

A surface boundary treatment could be considered appropriate.

Equally, a harder vertical boundary consistent with urban housing typologies (such as a low wall with railing) would have balanced the need to clearly demarcate public and private space whilst at the same time allowing opportunity for gaps in this boundary treatment to allow access between the street and individual front doors.

- 3.9 A good design response (as opposed to a poor design response) would create a strong active frontage to Crookham Road and also extend this along St. James Close. The proposed development does not achieve this and therefore offers a poor design in this respect.

- 3.10 This leaves the concerns relating to massing, appearance and local character.

- 3.11 The limitations of the Design and Access Statement concentrated on shallow expressions of local character, these being materials and details. There was no exploration of sources of local character in terms of massing and appearance; and how these could be translated. There was no critical appraisal of the context with a failure to differentiate between buildings that contribute positively, indifferently or negatively towards local identity (Design and Access Statement, p.8 and 9).

- 3.12 The design approach for the facade was based on street facing gables. Whilst street facing gables are evident along Fleet Road, these are somewhat abstract architectural references. Many of the gables are on building of a smaller scale that are more modest in height and width. Instead, cues should have been taken from buildings of a similar scale, identifying building that create a place with a sense of local character and distinctiveness through the use of different building shapes and elements.

A useful reference point is Royal Parade (1928). This is not to say that gables could not work, but the elevations as submitted lack the detail and quality associated with buildings with street facing gables that contribute positively to local identity.

- 3.13 A good design response (as opposed to a poor design response) would identify and draw inspiration from appropriate locally distinctive buildings that contribute positively to the place. Instead, the development offers to repeat the generic and largely placeless architectural approach that offers little to the positive

characteristics of our built environment. The proposed development does not achieve this and therefore offers a poor design in this respect.

- 3.14 On the basis that the development fails to take the opportunities available and fails to respond positively to urban design policies and guidance I consider that the Council was justified to refuse planning consent on design grounds.

## Appendices

### Urban Design Advice Note: Hart District Council

<b>Site</b>	19/02659/FUL Demolition of existing building and redevelopment of the site to form 31 retirement apartments including communal facilities, retention of existing access, car parking and landscaping Police Station 13 Crookham Road Fleet Hampshire GU51 5QQ
<b>Date</b>	6 October 2020
<b>Advisor</b>	Dr. Stefan Kruczkowski
<b>Officer</b>	Robert Moorhouse

Dear Rob

Further to recent emails, I have reviewed the information you sent over and the application on the portal remotely.

My starting point is always the context, this is reinforced by NPPF 130, i.e. taking the opportunities for improving the character and the quality of any area. This is further reinforced by the National Design Guide.

I am unsure why the Design and Access Statement (and subsequently the design) has failed to identify and respond to some key opportunities that are on offer here; these being the opportunity to create a positive and active frontage to Crookham Road (i.e. front door to the street as opposed to towards the side car park and a second to St. James Road). Other key opportunities are:

- enlivening the Crookham Road elevation with features such as usable balconies, in turn helping to
- break the mass of the building down and settle it into its context; avoiding a monolithic and dominant building mass.
- create active frontages with the streets the development has an interface with.
- create a garden that maximises sunlight (instead the garden has a semi-southern aspect where much of it will be in shadow).
- surface water management and habitat creation.
- local identity.

The street elevations that you sent and are shown elsewhere within application material show the somewhat awkward and removed relationship the proposed development would have, not only with Crookham Road but adjacent development.

There appears to be some element of 'cutting into the site' to create a level plateau for the building, but this results in the development 'sinking' below the level of Crookham Road and results in a fundamental disconnect between the building and Crookham Road.

This disconnect is further reinforced by the boundary treatment along this street edge (hedge and railing). The development's principal entrance (front door) is needed to Crookham Road; instead we have a door addressing the car park and a second 'shoppers' entrance' onto St. James Road. As such the orientation and the arrangement of the building (when combined with my garden orientation comments) has been approached in a way that is not responsive to the site and its context. Whilst it

is appreciated that this orientation and arrangement might work from an operational perspective, it does not work from an urban design perspective).

Without visiting the site, I make the following comments with some caution:

Elevation C suggests a somewhat overbearing relationship on neighbouring homes and Sectional Elevation C appears to show a circa 17m gap between the proposed development and a single storey home. Both elevations show the dominant and heavy roof mass that is proposed.

Elevation B shows a largely blank and un-expressive corner element which will be the first impression of this development as you approach Crookham Road from the south. These and other elevations illustrate a large and rather monolithic building mass. The depth is greater than much of the surrounding context. The justification for this seems to be a similar scaled facility within the town, but the context here is different and more residential (or domestic) in scale.

Elevation D shows a largely blank elevation and overbearing building mass to St James Road. All the elevations show how the boundary treatments will create a deadening effect around the edges of the site, creating inactive as opposed to active frontages.

The development proposes a crown roof with the elevations showing the bulk and dominance of the roof structure. Crown roofs are usually provided to allow a fourth utility storey. Is a fourth storey proposed? If not, the roof form could perhaps be less dominant.

The garden space is (as previously noted) going to be substantially in shadow most of the time which seems very unfortunate. It is illustrated as an amenity space but with a little imagination could become a very attractive and enjoyable space. For instance, small allotments could not only improve the relationship with the surroundings (helping to create active street edges) but create habitat opportunities. There seems to also be an opportunity across the site for the development to manage surface water that falls onto it. I note that there are underground tanks but there seem to be other opportunities here that could be capitalised upon.

In terms of creating a development that has a connection with the place, I cannot really make sense of the Design and Access Statement and where the suggested local cues have come from and in turn how these have been interpreted. Sources of reference are more generic than memorable and it is unclear why more locally distinctive buildings have not been identified as points of reference and inspiration. There are cues within the town centre that could be used as sources of inspiration, but these opportunities have not been taken. Building appearance and details are generic with use of relatively functional building details such as UPVC fascias.

The interface with Crookham Road is of particular concern. If you zoom into Elevation A you begin to see exactly how this street edge will be resolved. On first glance it looks not only inactive but soft and green. However, when zooming in you begin to see the hard railing that will enclose the site and further divorce it from the street and its surroundings. It is therefore reasonable to assume that the applicant will seek gates to be erected to complete the enclosure and secure the car park.

On balance, I am not of the view that the scheme is well designed. It fails to respond as it should to the opportunities presented and its wider context.

In terms of how you proceed, I am not sure how receptive the applicant will be to these comments bearing in mind the submission date and the remarks made in the DAS with respect to seeking pre-

application comments (i.e. submitted material for comment April 2019; response received from the council on 10 May 2019 explaining no further comments would be made until after submission).

I trust these comments are of assistance. Please do not hesitate to contact me should you require any clarification on the points raised or further advice.

Stefan