



DESIGN STATEMENT PROOF OF EVIDENCE

SITE: FORMER POLICE STATION, 13 CROOKHAM ROAD, FLEET, GU51 5QQ

CHURCHILL RETIREMENT LIVING LTD.

CHURCHILL HOUSE

PARKSIDE

RINGWOOD

BH24 3SG

JANUARY 2021

TOWN & COUNTRY PLANNING ACT 1990

APPEAL BY CHURCHILL RETIREMENT LIVING LTD AGAINST HART DISTRICT COUNCIL'S FAILURE TO DETERMINE A PLANNING APPLICATION FOR THE DEMOLITION OF THE EXISTING BUILDINGS AND REDEVELOPMENT TO FORM 31 APARTMENTS FOR OLDER PERSONS WITH ASSOCIATED COMMUNAL FACILITIES, PARKING AND LANDSCAPING.

SITE AT: POLICE STATION, 13 CROOKHAM ROAD, FLEET, HAMPSHIRE, GU51 5QQ

LPA REF: 19/02659/FUL

PLANNING INSPECTORATE REF: APP/N1730/W/20/3261194

PLANNING INQUIRY DATE: 16-18 MARCH 2021

PROOF OF EVIDENCE AUTHOR:

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1.0. **Introduction**

Qualifications and Experience

- 1.1. I am Rob Jackson, Design Director of the South West Design Department of Planning Issues Ltd; Churchill House, Parkside, Ringwood, Hampshire, BH24 3SG.
- 1.2. I am a Chartered Architect, being a chartered member of the Royal Institute of British Architects (83360) and registered with the Architects Registration Board (070660D). I hold a Masters in architecture (MArch) having qualified with Distinction in 2005 and a Bachelor Degree in Architecture (BArch) from the University of Nottingham, voted in the top 3 architecture schools in the UK by the Architect's Journal.
- 1.3. I have worked for Planning Issues since November 2019. Planning Issues is a subsidiary company of Churchill Retirement Living (Group) Limited (Appellant) and I have been engaged to provide professional evidence in respect of this Appeal.
- 1.4. In 2002 I graduated with a Diploma in Architecture (DipArch) from the University of Nottingham, England, having completed my Degree in Architecture (BArch) at the same University 3 years earlier. Following completion of my Diploma, I spent 3 years working in the office of Perkins Ogden Architects, an award winning private architectural practice specialising in education buildings.
- 1.5. In 2005 I qualified as a professional architect with a distinction in Professional Practice in Architecture (MArch).
- 1.6. In 2007, I commenced working at Design Engine Architects, another award winning private architectural practice. I remained there for 11 years, rising from Architect, via Site Architect and Associate roles to a Senior Associate position. Design work covered a number of typologies; education projects, private houses, flatted developments and pavilions. During my time at Design Engine the practice won a number of awards including Education Architect of the Year twice and my projects won a number of design awards.
- 1.7. Key projects included the £83 million / 24,000sqm John Henry Brookes Building for Oxford Brookes University which won an RIBA National Award, RIBA South Building of the Year, RIBA South Regional Award, RIBA South Sustainability Award, AJ Retrofit Award, Oxford Preservation Trust Award and the Education Estates Student Experience Award. It was also 'mid-listed' for the

Stirling Prize, the highest architectural award for the best building of the year, alongside the Shard by Renzo Piano and the London Aquatics Centre by Zaha Hadid.

- 1.8. Key retirement projects included design concept architect for a £15million extra care development at Chesil Lodge, Winchester (LABC South Awards: Best Inclusive Building and 2019 SPACES Civic Building of the Year award Highly Commended) described by the leader of Winchester City Council Cllr Caroline Horrill as “... *a top quality building that will benefit present and future generations...*”.
- 1.9. Other design projects included the £35 million, 7,500sqm West Downs Centre Building for University of Winchester which was designed to add state-of-the-art facilities to the University and be the first University building in the UK to be designed to the WELL standard and also to achieve Building Research Establishment Environmental Assessment Method (BREEAM) ‘Excellent’ rating.
- 1.10. In 2017 I was elected to sit on the Winchester and Eastleigh District Design Review Panel. As part of this body I regularly review schemes at pre-planning and planning stages to advise the local authorities on the quality of design, providing an independent, expert assessment of significant proposals. The importance of the Design Review Panel is emphasised through the NPPF in Paragraph 129.
- 1.11. In 2019, I commenced working for Planning Issues on Churchill Retirement Living retirement housing schemes, providing in-house professional design services. My previous experience in designing and delivering award-winning projects, as well as reviewing schemes by others, have informed my ability to assess what achieves high design quality and success.

Scope of Evidence

- 1.12. I have reviewed specifically the reasons for refusal as set out in the 'Delegated Planning Application Report'² dated 11th November 2020. My scope of evidence relates to reasons for refusal 2 only.
- 1.13. I have independently reviewed the design development and current proposal which is subject to this application. I have assessed the proposed scheme and considered whether in my opinion the design amounts to a high quality design and would positively contribute to the overall appearance of the area, as sought in planning policy and referenced in the refusal. I have also considered whether the proposal is in keeping with local character.
- 1.14. My evidence deals solely with design issues, specifically the design reason for refusal, although these inevitably cross over other issues. I defer to Mr Shellum on Policy issues.
- 1.15. This proof of evidence has been prepared both to describe the design process undertaken in arriving at the appeal proposals and to respond to Hart District Council's criticism of the design contained within their Reasons for Refusal and Officer's Report². This Proof of Evidence is submitted on behalf of Churchill Retirement Living Limited (the Appellant) in support of its appeal against the Refusal of Planning Permission at Police Station, 13 Crookham Road, Fleet Hampshire GU51 5QQ (LPA ref: 19/02659/FUL) for the

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.

Professional Endorsement

- 1.16. The evidence which I have prepared and provided for this appeal in this proof of evidence is true and has been prepared and is given in accordance with guidance of my professional institution and I confirm that the opinions expressed are my true and professional opinions.

Rob Jackson BArch MArch ARB RIBA

Date

2.0. **Background**

The Appeal Site

- 2.1. The application site consists of the former Fleet Police Station, 13 Crookham Road, Fleet. The site is vacant brownfield land of 0.26 hectares.
- 2.2. The site is in the ownership of the applicant. A strip of land to the north of the site is also in the ownership of the applicant but does not form part of the application site.
- 2.3. The site contains the former police building and associated garages, parking and hardstanding. The site slopes broadly from west to east with a level change of approximately 2m.
- 2.4. The existing buildings have no architectural merit.
- 2.5. The site currently provides no significant soft planting or biodiversity.
- 2.6. The existing quality of the site is low.
- 2.7. The site has few constraints to development.
- 2.8. The site is bounded by Crookham Road, St James Road and Walton Close.
- 2.9. The locality comprises a mix of use types including residential, retail, leisure and commercial uses.
- 2.10. Fleet Town Centre, focused on Fleet Road, is to the north east.

3.0. **The Policy Context Relating to Design**

The Development Plan

3.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 and National Planning Policy Framework (NPPF) paras. 3 and 47 require that the appeal must be determined in accordance with the provisions of the development plan unless material considerations indicate otherwise.

3.2. The development plan for the appeal site comprises:

1. South East Plan (SEP) Saved Policy NRM6.
2. Hart Local Plan (Strategy & Sites) 2032 (HLP32)
3. Hart Local Plan (Replacement) 1996-2006 Saved Policies (HLP06)
4. Fleet Neighbourhood Plan (FNP, 2019)

3.3. The following development plan policies are relevant to the design:

1. HLP32 Policy NBE9 Design (NBE9)
2. HLP06 Policy GEN1 General Policy for Development (GEN1)
3. FNP Policy 10 General Design Management Policy (FNP10)
4. FNP Policy 10A Design Management Policy related to Character Areas (FNP10A)

Material Considerations

3.4. Paragraph 212 of the NPPF states that the NPPF is a material consideration in planning decisions.

3.5. The National Planning Policy Framework makes clear that creating high quality buildings and places is fundamental to what the planning and development process should achieve. Section 12 is about 'Achieving Well-Designed Places' and includes paragraphs 124 to 132.

3.6. Relevant paragraphs to the proposed design are 124, 127, 128 and 130.

3.7. Other material considerations relating to design include:

1. Planning Practice Guidance (PPG)
2. National Design Guide (NDG, October 2014)
3. Building for a Healthy Life (BfHL, June 2020)
4. Hart District Council Urban Characterisation and Density Study (UCDS, 2010)

4.0. **The Proposal**

Appeal Scheme Design

- 4.1. The appeal seeks full planning permission for the demolition of the existing former police station buildings and redevelopment of the site to form 31 retirement apartments including communal facilities, retention of the existing access, car parking and landscaping.
- 4.2. As retirement apartments, owner's must be at least 60 years of age or 55 years of age with a spouse over 60 years. The average age of Churchill Retirement apartment owners is 80 years old.
- 4.3. The site is just to the south west of Fleet Town Centre. Churchill Retirement Living developments need to be within 0.5 miles of a town centre with a level walk to allow residents easy pedestrian access to local facilities.
- 4.4. The proposed apartments consist of 19no. one bedroom apartments and 12no. two bedroom apartments. These are supported by communal facilities including a one bedroom guest suite, secure entrance lobby and owner's lounge. The development would fall within Use Class C3 (Dwellinghouses). The development is for independent living and does not contain any extra care facilities.
- 4.5. A lodge manager would be employed during working hours, but there is no staff accommodation and no specialist medical facilities are proposed.
- 4.6. The proposed development consists of a single three storey building. A single building is required so residents can all access the shared communal facilities without leaving the building and a single building provides a secure form of development.
- 4.7. Ground floor level is set at the mid-point of the level change across the site. The main façade fronts Crookham Road with the main building entrance on the south west elevation. A secondary 'shopper's entrance' is located on the north east elevation.
- 4.8. Entrances need to be secure and provide safe level access.

- 4.9. The proposed design uses red stock brick and render for the wall finishes. Detailing includes red stock brick banding.
- 4.10. The roof is proposed to be slate effect concrete roof tiles.
- 4.11. Windows, soffits and fascias are proposed to be white uPVC
- 4.12. Vehicular access position remains unchanged from the current arrangement. The proposal provides 20no. car parking spaces at a ratio of 0.6 spaces per apartment. The amount of parking proposed is based on extensive experience of similar development types.
- 4.13. The proposal includes on site renewable power generation in the form of PV panels which will be hidden from view from surrounding ground level.
- 4.14. The proposal includes a design intent for the landscape scheme around the building including the boundaries of the site. The main amenity space for residents includes a patio area outside the owner's lounge and landscaped garden beside. Ground floor flats have direct access into the garden which is available for the use of all residents.
- 4.15. The design includes provision of a buggy and cycle store and refuse store. The sizes of the amenity space and stores are based on extensive client experience of operating retirement developments of this type with a specific end user demographic.

5. Reviewing the Proposed Design Against the Policy

5.0. Overview

5.0.1. Hart District Council have identified in their refusal the specific policies that they contend the appeal design does not accord with. It is assumed therefore that all other design policies are acceptable.

5.0.2. The reason for refusal to which my evidence relates is as follows:

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 in 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.

5.0.3. The reason for refusal is expanded on within the Delegated Planning Application Report². I have identified the following eight design issues from the report:

1. Site context and taking opportunities for improving the character and quality of the area.
2. Enlivening the Crookham Road elevation and active frontages.
3. Appropriate mass.
4. Appropriate elevations.
5. Local identity and appropriate materials.
6. Appropriate sunlight to the external garden.
7. Surface water management and habitat creation.
8. Waste and recycling provision.

5.0.4. I will review these identified design issues in turn comparing the proposed design against the relevant policies.

5.1. High Quality Design

- 5.1.1. As identified in section 3.1 the NPPF states that “*The creation of high quality buildings and places is fundamental to what the planning and development process should achieve.*” (para. 124)
- 5.1.2. In order to assess the quality of the proposed design we need to consider what constitutes ‘High Quality Design’ before we consider whether the proposed design meets this criteria.
- 5.1.3. The often quoted three pillars of quality design identified by first century Roman architect Vitruvius are *firmitas, utilitas, and venustas* or firmness, commodity, and delight. These identify durability, fit for purpose and delight as being the essential components of good design.
- 5.1.4. The NPPF sets out in paragraph 127 six criteria that developments should meet:
- (a) 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;
 - (b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
 - (c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
 - (d) 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;
 - (e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
 - (f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users 46 ; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.
- 5.1.5. The National Design Guide⁸ (NDG) expands on this to identify ten characteristics that should be considered within a high quality place when designed in practice; Context, Identity, Built Form, Movement, Nature, Public Spaces, Uses, Homes and Buildings, Resources, Lifespan.

- 5.1.6. The NDG⁸ seeks to guide all development types and scales and therefore while all the characteristics should be considered, some are more appropriate than others to any specific proposal. All interact to create an overall character of place and good design considers how a development proposal can make a contribution towards all of them.
- 5.1.7. High quality design needs to respond to more than the physical qualities identified in the NDG⁸. There are also requirements to achieve what is desired by the client, the end user and other stakeholders such as neighbours.
- 5.1.8. The designer needs to consider all health and safety aspects of the design and design out where possible any risks that may occur during construction, use or future demolition of the building. A high quality design necessarily considers all of these aspects in accordance with Construction Design Management Regulations.
- 5.1.9. The client has a business model that requires a number of functional criteria (*'utilitas'*) to be met by the design of each development. These include for example level access and thresholds, the inclusion of appropriately sized car parks, refuse stores and buggy stores based on their long experience of operating similar developments, a specific mix of one and two bedroom apartments (between 30 and 39% two bed apartments), all accommodation to be in a single building, specific flat, corridor, stair and lift designs, specific owner's lounge sizes based on the number of units, specific arrangement of the entrance sequence from main entrance past lodge manager's office and reception through owner's lounge in order to promote 'chance encounters' with other owners, a maximum of 50% internal kitchens, a maximum corridor length of 30m, a mix of apartment sizes on each frontage. Key functional criteria for the client were set out in the DAS on pages 3 to 5 to aid the LPA in understanding the functional requirements of the design.
- 5.1.10. High quality design needs to balance the sometimes competing health and safety, functional, commercial and aesthetic requirements of different parties to achieve firmness, commodity and delight.
- 5.1.11. Quality of design is often subjective and therefore those with relevant education, qualifications and experience of achieving high quality design are often best placed to judge design quality.

5.2. **Site Context and Taking Opportunities for Improving the Character and Quality of the Area**

- 5.2.1. An understanding of the site context, its surroundings and local character is key to a high quality design response.
- 5.2.2. HLP06 Policy GEN1 General Policy for Development clause (i) states proposals for development will be permitted where they *“Are in keeping with the local character by virtue of their scale, design, massing, height, prominence, materials, layout, landscaping, siting and density;”*
- 5.2.3. HLP32 Policy NBE9 Design criteria a) *“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.....”*
- 5.2.4. FNP Policy 10 General Design Management Policy *“1) 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”*
- 5.2.5. FNP Policy 10 General Design Management Policy *“2) Architectural design shall reflect high quality local design references in both the natural and built environment and reflect and reinforce local distinctiveness.”*
- 5.2.6. FNP Policy 10 General Design Management Policy *“3) 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”*
- 5.2.7. NPPF Paragraph 127 states that decisions should ensure that developments: *“(c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities); “*
- 5.2.8. NPPF Paragraph 127 states that decisions should ensure that developments: *“(d) 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; “*

5.2.9. The site context of this specific site was analysed by the applicant within the Design and Access Statement³ (DAS) on pages 6 to 14, with opportunities and constraints analysed on pages 17 and 18.

5.2.10. The Local Authority in their analysis of the site context have relied on the Hart District Council Urban Characterisation and Density Study (UCDS, 2010)⁷ to determine the design characteristics of the site. This identifies the site to be in 'Area D Fleet Road' of the Fleet Town Centre Neighbourhood Area, but not all of the characteristics that apply to this character area are in turn relevant to this site. The characteristics of this area identified in the UCDS and quoted by the LPA are:

- *Principal retail area of Fleet retaining its Edwardian character*
- *Mix of early 20th century purpose-built shops, with some 1960s infill and a 1980s shopping mall (The Hart Centre)*
- *Many locally listed buildings, mainly located in the south west part of the road*
- *Two-three storeys with a common building line, often on the back of the pavement*
- *The historic buildings are notable for their use of red brick, tile hanging, steeply pitched roofs and gables facing the street*
- *By contrast, the inappropriate scale and poor-quality detailing of the Hart Centre and some of the 1960s buildings*
- *Number of specific 'negative' buildings where sensitive redevelopment would be welcome.*

5.2.11. The site is only just within this character area and the immediate townscape context does not reflect the overall characteristics of Area D. Almost none of these characteristics can be seen from the site or are relevant to the immediate surroundings. There is no retail adjacent, there is no Edwardian character, there are no locally listed buildings within view, there is no consistent common building line, no view of a 1960s shopping centre. The only points of relevance are that buildings are two-three storeys and that there is a negative building on the proposed site where sensitive redevelopment should be welcomed.

5.2.12. FNP Policy 10A Design Management Policy related to Character Areas states that proposals for development will be supported where they have appropriate regard to the design characteristics for the relevant land use in that character area. The majority of

the design characteristics identified for this character area are not appropriate for this site.

- 5.2.13. I would hypothesise that the inclusion of the site in this character area relates to the civic function of the former police station rather than the character of the site itself.
- 5.2.14. The character of the site is more closely related to West Fleet Neighbourhood Area character area K which it borders to the south and east and character area G to the west. Character area K is identified within the UCDS⁷ as of 'mixed uses and ages'.
- 5.2.15. The understanding of the context of this specific site is much clearer as set out in the applicant's DAS³. The key point is noted on page 13 where the site is described as being a transition between the denser and historic core of Fleet to the north, and the suburban residential areas to the south. Much of the critique of the design by the LPA has been based on comparing the proposal against the more dense back-of-pavement development to the north, based on the UCDS⁷ character area, ignoring the suburban character of plots to the south (Walton Close), west (Stanton Drive and Grace Gardens) and east (Fir Close).
- 5.2.16. All properties along Fleet Road to the west and south of the site are set back from the road with landscaped or planted frontages and more private, recessive facades.
- 5.2.17. The scale and height of the site context is two to three stories.
- 5.2.18. The massing, density, configuration, size and typology of the site context is mixed and includes detached houses, terraced houses, semi-detached houses, bungalows and large flatted developments as well as commercial properties, leisure facilities and retail premises.
- 5.2.19. The figure ground diagrams within the accompanying brochure demonstrate the mixed nature of the site context and that a larger footprint detached building in this context is appropriate when read with Frayne's Croft and Grace Gardens developments.
- 5.2.20. The appearance of buildings in the site context is similarly mixed.
- 5.2.21. The building materials used in the site context is predominantly brick walls with some render and uPVC white windows. Roofing materials are a mix of slate, slate effect, concrete and clay tiles.
- 5.2.22. By seeing that the character of the specific site context as identified in clauses 5.2.14 to 5.2.21 rather than the characteristics identified at 5.2.10, we can see that the proposed

design response for a two to three storey residential building set slightly back from Crookham Road is entirely valid in the context in terms of use, layout and scale and accords with policies GEN1(i), NBE9 (a) and NPPF paragraph 127 (c) and (d) as well as the National Design Guide⁸ characteristics for Context, Identity and Built Form.

- 5.2.23. Notwithstanding the difference in understanding of the essential character and context of the site, the appellant concurs that key opportunities for improving the character and quality of the area should be taken as required by NPPF¹ paragraph 130. The proposed design takes these as described below.

5.3. **Enlivening the Crookham Road Elevation and Active Frontages**

- 5.3.1. Crookham Road elevation is the main public face of the proposed development, facing onto an important road within the town. This is identified by both the appellant and the LPA as an opportunity for the site to improve the setting of the road and create an active frontage.
- 5.3.2. The current contribution of the existing building and landscape to the Crookham Road is a negative one.
- 5.3.3. HLP32 Policy NBE9 Design criteria *“b) 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.”*
- 5.3.4. HLP32 Policy NBE9 Design criteria *“c) the layout of new buildings reinforces any locally distinctive street patterns, responds to climate change, and enhances permeability by facilitating access by walking or cycling modes.”*
- 5.3.5. HLP32 Policy NBE9 Design criteria *“d) it respects local landscape character and sympathetically incorporates any on-site or adjoining landscape features such as trees and hedgerows, and respects or enhances views into and out of the site”*
- 5.3.6. HLP32 Policy NBE9 Design criteria *“g) 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;”*

- 5.3.7. FNP Policy 10 General Design Management Policy “4) *Strong building lines shall be respected and soft landscaped front gardens and landscaped front boundaries should be retained and enhanced*”.
- 5.3.8. The criticism of the proposed design is that it would fail to integrate and interact successfully with Crookham Road as it is set back from the road and at a lower level, has landscaping between the building and the road and does not provide a ‘front door’ onto the road.
- 5.3.9. The existing police station building is set back from the road further than the proposed design and is fronted by car parking. The proposal moves the building line forward and removes the visual barrier of cars representing an aesthetic improvement on the existing setting to the road. It therefore accords with policy NBE9 (b).
- 5.3.10. The setting of the building back from the back of the pavement steps the building line along Crookham Road from the back of pavement position of 1-5 St. James’ Close to the setback buildings of Walton Close and properties further south. The position therefore mediates between these building lines with the design being a transition between the urban and suburban conditions. The layout reinforces the locally distinctive condition of this site as a transition between urban and suburban and therefore accords with policy NBE9 (c) and respects the local landscape character of buildings set back behind landscaping as policy NBE9 (d) and FNP Policy 10 (4).
- 5.3.11. By stepping the building back and having an area of amenity space between the building line and the road an area is created for residents to come out of their dwellings and enjoy. This will activate the street scene more than having the proposal hard to the back of the pavement as suggested by the LPA. This is in accordance with policy NBE9 (g).
- 5.3.12. Each ground floor flat has external doors onto a patio space. This encourages residents, who in retirement properties are active occupiers during the day, to occupy the space to the front of the proposal. This will naturally create active frontages, vitality, movement and surveillance.
- 5.3.13. The National Design Guide⁸ defines active frontages as “*The front of a buildings (sic) with openings onto the space that generate activity and engagement between the building interior and the space outside, particularly entrances.*” (page 32)
- 5.3.14. The properties at 1-5 St James’ Close are at the back edge of the pavement and have front door entrances. They should therefore be ‘active frontages’ following the

argument put forward by the LPA. However the residential typology means privacy becomes key for residents. Blinds and net curtains have been installed to stop strangers peering through the windows and in reality, despite the number of doors and windows, this is a very 'inactive' frontage.

- 5.3.15. By contrast the proposed design will enliven the Crookham Road streetscene. The proposed amenity space is set down and back from the road which gives some privacy and separation from traffic, but allows some interaction between the public realm and residents. The boundary treatment is set at a height to allow passing pedestrians visual connection with residents at the front of the building. The setting down of the building is key to dealing with the sloping site levels of approximately 2m across the site, making the building safely accessible to all at a single level. This is in accordance with policies NBE9 (b) and (g) and NPPF policy 127(f).
- 5.3.16. The landscaping follows the context analysis of properties to the south and west along Crookham Road where dwellings are set back from the road with landscaped boundaries. This is an entirely appropriate response and rather than creating a 'deadening' and 'inactive' space will provide mediation between the active flat frontages and the road which will be a visual benefit from both public and private realm.
- 5.3.17. As required by policy NBE9 (b) and (g) the retirement proposal needs to be secure to ensure the safety of residents. In order to achieve this a single point of access is required for visitors. This entry point is adjacent to a reception and office for the lodge manager who therefore provides passive surveillance in addition to the door entry systems. This is also the primary access point for residents promoting the likelihood of chance encounters which help foster the sense of community and wellbeing.
- 5.3.18. It is not appropriate for this main entrance to be directly from Crookham Road because of the level changes meaning stepped access or extensive ramps would be required. It would also not be visible from the car park area and mean an extended distance of travel from the car park for visitors or residents, many of whom may be less able.
- 5.3.19. The most appropriate location for practical entry to the building is at the south elevation as designed, where it can be seen from both Crookham Road and the car park and can provide level access into the building.
- 5.3.20. The applicant does not believe it is appropriate for security and wayfinding reasons to add a secondary or 'false' entrance to Crookham Road. There is a fire escape route from

the stair on this elevation but to enhance this architecturally and make it appear like an entrance is misleading to visitors and could result in people trying to gain access through a secure egress. Good design should follow the best function of the building.

5.3.21. The St. James Road elevation does have a 'shopper's entrance allowing residents a more direct route towards the town centre and this will to a lesser extent activate this elevation. This is in accordance with NBE9 (b).

5.3.22. The Crookham Road elevation will be enlivened by the active frontage of retirement flats opening out onto it which is an appropriate design move and takes the opportunity afforded by the site to create an active frontage.

5.4. **Appropriate Mass**

5.4.1. The design has been carefully developed to follow the storey heights and massing appropriate to the context.

5.4.2. The context analysis within the DAS³ (page 13) has identified this site as a transition site between the more urban grain development to the north and the sub-urban development to the south. Larger footprint flatted developments at Fraynes Croft and Grace Gardens with similar or larger 2-3 storey mass provide this same transition on the opposite side of Crookham Road to the site. The footprint depth corresponds to similar developments in this location.

5.4.3. The building has been set down into the site, to both create a level access to all points and reduce the height of the building in relation to neighbouring dwellings.

5.4.4. The proposal has a similar eaves height to St James' Close.

5.4.5. Accommodation is tucked into the roof and dormered to reduce the overall mass.

5.4.6. The roof is stepped to break down into elements reducing the visual appearance of the mass. Dormers further visually break up the roof mass.

5.4.7. The height, scale and mass are appropriate for this site and in this context.

5.4.8. Verified views from key points have been independently prepared for this appeal demonstrating that the mass is appropriate (see appendix 1).

5.4.9. The mass of the proposed design is therefore in accordance with policies NBE9 (a), GEN1 (i), FNP10 (1) and (3).

5.5. **Appropriate Elevations**

5.5.1. The elevations are described as being 'blank' and 'overbearing' at the north-east and south-west corners. These corners will be seen in three-quarter view with the Crookham Road elevation and are deliberately understated to allow the centre of the Crookham Road elevation with its gables to have primacy. Limited secondary windows prevent overlooking of neighbouring dwellings and are typical characteristic of buildings in the streetscene.

5.5.2. Gables with limited articulation are a feature of the immediate context, for example at No.5 St James Close facing St James Road, opposite the site at Fraynes Croft, at number 5 and 15 St James Road etc.,

5.5.3. Verified views from key points have been independently prepared for this appeal demonstrating that the elevations are in the appellant's view appropriate (see section 5 of the accompanying A3 brochure). However the addition of larger windows or additional detail could be considered if it were deemed appropriate by the Inspector. Examples of changes of materials suggested by the LPA are included in Section 06 of the accompanying A3 brochure.

5.5.4. The National Design Guide⁸ states in the 'Identity' characteristic that "*Well designed places contribute to local distinctiveness. This may include: adopting typical building forms, features, materials and details of an area;*" (para 58). The DAS and context analysis show the character of the site context as understood by the appellant and how the proposed design adopts these characteristics.

5.5.5. In my professional opinion the design of the elevations have been developed to be benign and polite representing a quiet, measured building. This is the wrong site for a 'loud', 'gateway' or 'landmark' building design and as such accords with the intent of policies GEN1 (i), FNP10 (2) and (3) and NPPF para.127 (b), (c) and (d) and para 130.

5.6. **Local Identity and Appropriate Materials**

- 5.6.1. The National Design Guide⁸ para 56 says “*Materials, construction details and planting are selected with care for their context. They are attractive but also practical, durable and affordable. They contribute to visual appeal and local distinctiveness.*”
- 5.6.2. The DAS³ covers a detailed analysis of the materials and features of buildings in the local context (pages 8, 9 and 12).
- 5.6.3. The adjacent local context is described in the UCDS Appendix 1 Map of West Fleet Neighbourhood Area (page 27) as being “*Mixed Development (in terms of age and / or use)*”
- 5.6.4. The local materials identified are typically red stock brick, areas of render, uPVC windows with brick heads and cills and concrete or clay roof tiles. Gables are a typical feature.
- 5.6.5. The contextual elevations show how the proposed design will fit appropriately within the local context. The verified views prepared for this appeal and included in the accompanying brochure supplement these elevations.
- 5.6.6. Materials have been chosen for their limited combustibility to ensure fire safety, longevity and minimal maintenance ensuring the building will continue to weather well over its lifetime. Whilst this has been criticised by the LPA in the case officer’s report as “*relatively functional building details*”, good functionality for the proposed materials is in fact a positive attribute of the proposed design. Indeed, this is required by policies NBE9 (h) and NPPF para.127 (a). This is one of the pillars of high quality design identified in 5.1.3.
- 5.6.7. Churchill Retirement maintain an interest in the developments throughout the lifetime of the building and therefore appropriate materials which last well and are appropriate to maintain are essential for the business model in the long term. Apartments need to remain looking good for future sales and an attractive development embedded into the community is essential for this.
- 5.6.8. The proposed design seeks to ‘fit in’ rather than ‘stand out’ and be a good background building allowing the historic buildings further along the Area D character area (UCDS⁷) to take primacy.

5.6.9. The introduction of alternative materials, whilst a departure from the local context, could be considered, and even conditioned. Some example elevations are provided in appendix 3.

5.7. **Appropriate Sunlight to the External Garden**

5.7.1. The main garden area sits to the east of the building.

5.7.2. This has been criticised as it *“would be substantially in shadow most of the time”*.

5.7.3. Sunstudy diagrams have been independently prepared and included in the accompanying A3 brochure demonstrating that the east facing amenity space will provide a choice of shade and sunlight for most of the time.

5.7.4. The idea that an amenity space can only be successful if it is south facing and that all properties should have south facing amenity spaces is not a reasonable position to take.

5.7.5. The provision of a south facing amenity space on this site would mean necessarily built mass closer to the front elevations of numbers 15 and 17 St James’ Road and the provision of a number of north facing single aspect apartments. For these reasons the site layout proposed is the best achievable design on the site and has been responsive to both the site and its context.

5.7.6. There is no specific policy requiring a certain amount, area or time of direct sunlight to external amenity space.

5.8. **Surface Water Management and Habitat Creation**

5.8.1. The current site is entirely impermeable and has no habitat or biodiversity.

5.8.2. The proposal will introduce an attractive landscape scheme which will improve net biodiversity and reduce water run-off.

5.8.3. A full drainage design will be prepared as part of detailed design and is included in the draft conditions.

5.8.4. The proposed design is therefore in accordance with policy FNP10 (5).

5.9. Waste and Recycling Provision

- 5.9.1. The waste and recycling provision proposed is in line with the appellant's experience of the amount required by this typology.
- 5.9.2. The site plan shows four containers in the bin storage area.
- 5.9.3. In the committee report² the LPA have calculated that the site requires:
- 5 x 1100 litre waste containers
 - 5 x 1100 litre recycling containers
 - 2-3 x 240 litre glass recycling containers.
 - Space for additional waste and recycling containers for potential future services including the collection of food waste.
- 5.9.4. This equates to a total of **11,720L** plus expansion space
- 5.9.5. This calculation is on the basis of open market accommodation and not specific to retirement developments.
- 5.9.6. It is worth noting that in Churchill Retirement schemes and in retirement housing schemes in general the occupancy rates are typically 50% lower than open market housing (i.e. a one bed will generally be occupied by 1 person compared with up to 2 in open market and a two bed will only ever be occupied by a maximum of 2 people compared to 4 in open market). Churchill Retirement have developed a detailed understanding of the typical waste requirements attributed to our schemes based on research carried out from operational Churchill lodges across country. Due to the nature of Churchill schemes and its target demographic, it is felt that the guidance given is far in excess of our typical requirements and the provision required would not be used. The vast number of flats are single occupancy and the owners are daily basket shoppers with low carbon footprints.
- 5.9.7. Past negotiations with other Local Authorities have found a reduction on guidance figures to be acceptable upon investigation of other sheltered housing schemes in their districts. For example existing larger schemes at Portswood, Southampton (73 units), Parkgate, Eastleigh (46 units) and Newbury, Berkshire (59 units) all provide just 5 x 1100L bins for waste. In respect to recycling provision Newbury provides a total of 3360L

(equivalent of approx. 3x1100L containers), Parkgate 2160L (equivalent of approx.. 2x1100L containers) and Portswood 1340L (equivalent to 1-2 x 1100L containers).

5.9.8. Based on our experience and BS5906 we apply ratio of:

- Total waste generation rate of 100 litres per week for one bed apartments – 19 x 100L = 1900L
- Total waste generation rate of 170 litres per week for two bed apartments – 12x170L = 2040L

5.9.9. The total capacity required would be 3940L and therefore provision of 4 x 1100L bins would be sufficient (**4400L** capacity)

5.9.10. The provision is therefore in accordance with policy NBE9 (h).

5.9.11. Additional space could be created for waste storage if it were deemed necessary by moving the adjacent parking and buggy store further in to the site.

5.10. Review of Proposed Design compared to requirements of NPPF Paragraph 127

5.10.1. ***(a) 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;*** The design is based on the appellant's 25 years of experience of similar developments and the location and arrangement proposed in the appellant's experience will function well over the lifetime of the development. The existing site offers a poor quality building and external landscaping to the area and the proposed design will add to the overall quality. The careful selection of appropriate durable materials which will weather well and require reduced maintenance means that this quality will be appreciated for the long term.

5.10.2. ***(b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*** High quality design of the architecture and landscaping responds to the criteria identified in 5.1, responding to site and brief constraints and opportunities. The landscaping will be effective for both resident's needs and contribute to biodiversity and visual amenity to passers-by. The architecture is visually attractive as demonstrated in the elevations and Verified Views prepared for this appeal. The architecture is in keeping with recent development locally within Fleet. The proposal is an enhancement compared to the current building on the site.

5.10.3. ***(c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*** The proposal increases the density of the site by taking the opportunity to efficiently use a brownfield site to provide much

needed specialist residential housing. The design responds to the detailed context analysis as set out in the DAS. The design is entirely appropriate to the mixed and transition character of the context.

- 5.10.4. ***(d) 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;*** The appellant's contextual analysis identified this site as being between two characters, one denser urban and back-of-pavement condition and the other suburban and set back. The high quality design mediates between these conditions with the arrangement to create a sense of place that mediates between the two. The building type and materials proposed are entirely appropriate in the site context and reinforce the local character.
- 5.10.5. ***(e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks;*** The density of the site has been increased by the proposed accommodation which is optimised to fit in with the context in scale whilst maximising the efficient use of this brown field site. The single use mix is necessary for this type of accommodation and a contribution to offsite affordable housing will be made. The proposal will provide a number of new residents to support local facilities and the location close to town means it is inherently close to local transport networks.
- 5.10.6. ***(f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users ; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience*** The proposal is designed to be safe for residents and minimise the opportunity for crime and disorder. The current vacant building and curtilage could become a target for use for anti-social behaviour or crime. The proposal will remove this possibility. The proposed development will have new boundary treatment and secure limited access via a main entrance for residents and visitors and a 'shopper's entrance' for residents. The provision of apartments with multiple windows provides passive surveillance in all directions which is a deterrent to crime. The access to the building is controlled by security systems and passively monitored by the lodge manager and their office and reception close to the main entrance. The proposed design provides a high standard of appropriate amenity space for future end users including a south-east facing patio and east facing communal garden. The design is for an older demographic and inclusive and accessible design is therefore at the heart. All access is level and a central lift is provided for circulation. Apartments are designed with generous circulation spaces and all have a central communication system for getting help if required.

5.10.7. The proposed design therefore positively responds to all aspects of paragraph 127 of the NPPF and is high quality.

5.11. **Review of Proposed Design compared to requirements of NPPF Paragraph 128**

5.11.1. The NPPF says that “*Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot*”.(paragraph 128)

5.11.2. Prior to application an online public consultation was held between 15th October and 25th October 2019. Planning Issues contacted 842 people to invite them to view the proposals and 7 responses (0.8%) were received as outlined on page 22 of the DAS. Where possible any concerns expressed were addressed with the proposed design. This included increasing parking provision, adding mobility scooter storage, addressing highway and infrastructure concerns with further specialist design work and addressing affordable apartments with off-site contribution.

5.11.3. During the formal application only a single letter from members of the public was received and this was in support. The appellant has worked hard to engage meaningfully with the local community and the lack of any objection to the proposal from members of the public shows the success of this.

5.11.4. A pre-application design was issued to Hart District Council at the end of April 2019. An email was received from Hart District Council on 10th May 2019 noting that they have no further comments on the design until the application was formally submitted.

5.12. **Review of Proposed Design compared to requirements National Design Guide**

5.12.1. The National Design Guide⁸ identifies ten characteristics which together create the physical ‘Character’ of a place. All of these are relevant to every design, but some will have a higher priority depending on the design being developed. The proposed design has responded appropriately to each characteristic; context, identity, built form, movement, nature, public spaces, uses, homes and buildings, resources and lifespan.

5.12.2. For brevity I do not intend to reiterate here how the proposed design accords with all ten characteristics but this can be found through the preceding evidence as well as the application information including the Design and Access Statement.

6.0. **Executive Summary and Conclusion**

6.1. Paragraph 124 of the NPPF states that the creation of high quality buildings and places is fundamental to what the planning and development process should achieve.

6.2. Paragraph 130 of the NPPF states that permission should be refused for development of poor design which fails to take opportunities available for improving the character and quality of an area.

6.3. The existing site and buildings are of a poor quality and do not contribute favourably to the context.

6.4. A careful site analysis has identified the mixed character of the site context and identified local themes of building layout, scale, mass, materials and landscape. It has also identified opportunities for the site.

6.5. In the absence of a strong policy to guide the design, as advised by NPPF para. 126, the proposed design has taken the site specific context of the townscape as its starting point and responds to this with an appropriate proposal to meet the requirements of the client's brief and sit comfortably in the local context of the site with a durable simple design.

6.6. The design has been developed in accordance with what constitutes 'High Quality Design' in terms of policy and guidance.

6.7. The building layout and form follow the function of the proposed building. This has been honed over a period of 25 years by the applicant's experience in developments of this type. The general knowledge gained in what works and does not work for the end user for these type of developments has fed into the site specific design of the appeal proposal. This is the 'functional' or '*utilitas*' part of a high quality design.

6.8. The proposed scheme takes the opportunity to follow the pattern of development in this area and, with the use of appropriate materials, form and scale to strengthen and improve the character and quality of the area. The polite architecture would add delight, '*venustas*', to the setting and is a high quality design.

- 6.9. The materials chosen for building and landscape are both appropriate for the context and also durable for the future. The appellant continues to have an interest in the development in the long term and therefore it is important that materials last and are easy to maintain. The design is durable or '*finitas*' and as such is a high quality design.
- 6.10. Taking into consideration the detailed assessment in Section 5 of this document, in my opinion the proposed design of building and landscaping would make a positive contribution to the townscape, enhancing positive qualities and improving existing negative ones. The National Design Guide defines the three pillars of high quality design as Fit for Purpose, Durable and Delight (para. 4). In my opinion the proposal is a high quality design that meets these criteria, sits well within and positively contributes towards its context and meets the needs of its future occupiers.
- 6.11. Taking into consideration the relevant design policy documentation reviewed in Section 3, it is my opinion that the proposal complies with the intent of these to ensure high quality building and place design that would enhance the character of the area. This applies to local policies, the NPPF and National Design Guide.
- 6.12. For all of the above reasons I do not consider that the planning application should have been refused on design grounds and I would therefore respectfully ask the Inspector to allow the Appeal, and grant planning permission.

Bibliography

1. **National Planning Policy Framework, February 2019 (NPPF)**
2. **Robert Moorhouse, Delegated Planning Application Report, 11th November 2020**
3. **Churchill Retirement Living Ltd. & Planning Issues, Design and Access Statement, June 2019**
4. **Hart Local Plan (Strategy & Sites) 2032 (HLP32) Policy NBE9 Design (NBE9)**
5. **Hart Local Plan (Replacement) 1996-2006 Saved Policies (HLP06) Policy GEN1 General Policy for Development (GEN1)**
6. **Fleet Neighbourhood Plan (FNP, 2019) Policy 10 General Design Management Policy (FNP10)**
7. **Hart District Council Urban Characterisation and Density Study (UCDS, 2010)**
8. **National Design Guide (NDG, October 2014)**
9. **Building for a Healthy Life (BfHL, June 2020)**