

**LAND WEST OF LYTTON WAY
STEVENAGE**

**SUPPLEMENTARY STATEMENT ON
DESIGN, TOWNSCAPE AND HERITAGE**

**Richard Coleman Dip Arch (Cant) ARB
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on behalf of Hill Residential Ltd

Planning Inspectorate Reference:

APP/K1935/W/20/3255692

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1.0 INTRODUCTION

1.1 Qualifications and Experience:

1.1.1 I am Richard Coleman Dip Arch (Cant.), RIBA Chartered Architect and independent Architecture, Heritage and Townscape Consultant.

1.1.2 I give advice on architecture, urban design, townscape and matters concerning development in historic environments. I set up my consultancy in 1997, after holding the post of Deputy Secretary at the Royal Fine Art Commission for 13 years and following a varied architectural career designing new buildings and work to historic buildings including restoration work at Hampton Court Palace and Windsor Castle and alterations and extensions to buildings within Bushey Park and Windsor Great Park. As principal of Citydesigner I have contributed to a great number of high profile projects affecting heritage townscapes and landscapes, from giving urban design and heritage advice for the Swiss Re building (the Gherkin) in the City of London, to carrying out the heritage assessment for the Eric Parry extension to the Grade I listed Holburne Museum within Sydney Gardens, part of the City of Bath World Heritage Site. My work generally concerns the achievement of an appropriate quality of design for developments which are prominent or affect conservation areas, listed buildings, registered landscapes such as the Royal Parks, National Parks and World Heritage Sites. Other examples are provided in my Appendix 1 to this Proof of Evidence.

1.1.3 I was appointed by the Deputy Prime Minister's Office in 2002 to be part of a working group tasked with rewriting the then guidance on conservation and archaeology, PPG15 and PPG16. The current NPPF embodies a number of refinements I introduced at that time, first included in the now superseded PPS5, i.e. contribution/harm categorised on a scale.

1.1.4 I was also appointed in 2005 by Mayor Livingstone to draft the 2006 (first draft, but not the originally adopted) version of the Supplementary Planning Guidance for consultation on the London View Management Framework (LVMF), for the management of views across London as outlined in Section 4 of the then London Plan. Co-author, John Hare, and I resigned having produced the draft guidance, as the Mayor was unwilling to accept advice arising from the public consultation. John Hare and I were subsequently re-appointed by Mayor Johnson to review the LVMF on his

behalf, which enabled adjustments to be made; the revised version was published in July 2010.

- 1.1.5 I have had the privilege to work alongside some of the most accomplished UK architects and some internationally famous foreign architects. Through over 30 years of analysing existing historic contexts and architectural design, I have gained a depth of knowledge about achieving and assessing sensitive high quality designs in relation to context, often the historic environment, through the application of objective criteria.
- 1.1.6 I hold a number of honorary advisory roles at organisations including: The Architecture Club, Built Environment Media Ltd. and Brighton West Pier Trust. I have advised two Surveyors of the Fabric of St Paul's Cathedral and CABE (The Commission for Architecture and the Built Environment), having been a design panel member for London and Oxford. I have lectured in the UK, USA, Europe and the Far East. I co-founded World Architecture News.com, the first online only architecture periodical.
- 1.1.7 An extended and illustrated version of my CV, list of major clients, and architects I have collaborated with can be found in Appendix 1 to my Proof of Evidence.

1.2 Appointment:

- 1.2.1 I was appointed by Hill Residential Ltd in May 2020 to appraise the design, and the townscape and heritage sensitivities arising from their development proposals for the appeal site on Lytton Way, in Stevenage.
- 1.2.2 I have cooperated with other consultants to ensure that the appeal scheme is fully illustrated in terms of new views out of the Stevenage Old Town Conservation Area and the site's surroundings. I have provided advice to Joanna Ede of Turley in regard to her Townscape and Visual Impact Appraisal (TVIA); the presentation of the landscape architects' proposals; and the close-up CGIs produced by the architects.

1.3 Site Visit:

- 1.3.1 I attended a site visit on the 21st of May 2020 with Joanna Ede and was given a full internal and external tour of the building on the appeal site and its surroundings. I also

visited a number of viewpoint positions to add to and assist with the viewpoint study carried out by Joanna Ede.

1.4 Brief to provide independent objective advice for the Inspectorate:

- 1.4.1 My evidence draws from, and enlarges upon, the professional assessment of the scheme within Turley's TVIA, which is before the inspectorate. My evidence deals with design quality and the effects of the appeal scheme on the surrounding designated and undesignated context, including the Old Town Conservation Area and a number of listed buildings within and outside the conservation area.
- 1.4.2 I also analyse the Stevenage Borough Council's reasons for refusal and the Officers' Report to Committee in relation to this Appeal and explain why I disagree with their former's conclusions regarding matters of height, design quality, townscape and visual effects.
- 1.4.3 My evidence is additional to that provided by the architects, the landscape architects, the townscape assessor, and the planning adviser. While the subject matter of these proofs of evidence on occasion overlaps with mine, my evidence is independent and does not rely on the content of theirs. My evidence base is the planning application before the Inspector, national, regional and local policy and guidance, Stevenage Borough Council's documentation, consultations and a direct knowledge of the scheme, the site and surrounding sites of significance, their history and their designations.

1.5 Declaration of truth:

- 1.5.1 I declare that the evidence set out here for the appeal, ref: APP/K1935/W/20/3255692 is true and follows accepted good practice. I confirm that the opinions expressed are my true and professional opinions.

2.0 APPEAL SITE

2.1 History in relation to the development of Stevenage as the first of the post war New Towns:

2.1.1 The history of Stevenage as the first of the post war New Towns, planned and begun in 1949, and of the appeal site in relation to the New Town is presented in detail in Appendix 2. It is supported by a series of historical maps. The appeal site remained undeveloped until the construction of the current building around 1989. The original allocation for wholesale/business use, specified in the New Town masterplan, fell away in favour of a preference for an international insurance company, as the site proved to be ideal for this.

2.1.2 The appeal site was designed by the architects Elsworth Sykes Partnership and completed in 1989. It was commissioned by Confederation Life Insurance, founded in 1871 in Toronto, Canada, as its UK headquarters. This is confirmed in articles in Building Design magazine of 1989, the Independent newspaper of 1992, Stevenage Borough Council's planning archives, and business directories (see details in Appendix 2). It is further confirmed that Eagle Life Insurance, which has been mistakenly rumoured to be the first occupant at this time, moved their headquarters from London to Cheltenham in 1968. This has been confirmed through files retrieved from the London Metropolitan Archives. The occupation by 'Eagle Star' is, therefore, a myth.

2.2 Description of the site

2.2.1 A description of the site context is provided within the Appeal draft Statement of Common Ground and in Turley's TVIA of July 2020. It has not been repeated here.

2.3 The existing building

2.3.1 I have thoroughly toured the existing building internally and externally and have understood its origins and most recent plight of finding a new use, which has failed. I recognise the potential of a redevelopment for housing use in these circumstances, given its potential and in view of its prime position between, and adjacency to, both the town centre and the station of a popular commuter town.

2.3.2 Despite its apparent good condition, striking design and mature landscape, I have reached the view that, despite the reasonable condition of the building, it should indeed yield to provide the potential for a high quality, high density housing development with much of the existing perimeter landscape retained and enhanced.

2.4 Provenance of building design i.e. architect, relation to contemporary trends, other examples of the era

2.4.1 The appeal site is not, nor is it ever likely to attract, a heritage designation. The existing building does not stand up to scrutiny from an architectural or historic standpoint. At the time of its design great advances were being made in the design of edge of town headquarter offices of this kind. These advances include the quality of design and sustainability but were also based on a social approach to the organisation of workers and their relationship to the administration hierarchy of the business.

2.4.2 Foremost on this formative front was architect Herman Hertzberger's Centraal Beheer in Appledorn, Holland (see Appendix 2). Hertzberger structured the building into 'team' sized units such that each had an identity and could be personalised by the occupants. There was also an interpenetration and connection between spaces at different levels. It bucked the trend, spearheaded in Germany of the 'bürolandschaft' or open plan office space, where the spaces supported an authoritarian approach to management and creating team identity was ignored. Worker productivity and happiness increased at Centraal Beheer beyond even Hertzberger's expectations.

2.4.3 This was followed by a series of office projects designed by the multi-disciplinary architectural practice of Arup Associates in the UK. These were for Gateway paper manufacturers at Basingstoke; Lloyd's in Chatham; and CEGB in Bristol. All these are illustrated in Appendix 2. They show a development of Hertzberger's ideas, but go further, such that all functional aspects of the building followed the new working practices principles. Therefore, the structural arrangement and mechanical service runs were fully coordinated in harmony with the spatial principals. All of these buildings are now listed.

2.4.4 None of this formative work is apparent in the appeal building's design.

2.5 The qualities and deficiencies of the building in terms of appearance, setting, durability and architectural standing

- 2.5.1 In the appeal site building we see none of the Hertzberger's / Arup Associates' influences in the design such that it can be seen to lag behind the innovate office design path. It comes instead from the conceptually, frowned upon, previous era of 'ground-scraper', 'bürolandschaft' philosophy. Nevertheless, it is very well detailed and assembled and the atrium entrance is particularly impressive both spatially and in its rich use of materials (see figures 2.24, 2.26 and 2.27 in Appendix 2). It falls, however, into a category of architecture lacking a depth of thought for its purpose and future flexibility and expresses, instead, a rather mannerist post-modern style which is now very much dated. This was a time when coloured anti-sun glass became available and was overused and despised by the leading designers of the time. It was very much a product favoured by the second tier of professional and commercially focussed designers, like EPR Architects' 123 Victoria Street in London, which used bronze coloured glass, and the former American Express building by GMW in Brighton, which used, like here, a blue tint (see figure 2.9 in Appendix 2). The former has recently had clear glass as replacement, and the latter has now been demolished.
- 2.5.2 If there is an architecture of note from which some derivation is made, it is perhaps Sir James Stirling's History Faculty library building in Cambridge of 1968, which has a grand multifaceted, cascading, quarter dome-like, glass roof with two brick-clad wings embracing it (see figures 2.7 and 2.8 in Appendix 2). The appeal site building emulates this in its rather less fluent, glass atrium. Beyond this single element, the similarity ends.

2.6 Efficacy of decision to demolish and redevelop

- 2.6.1 There are some inaccurate myths about the building: first, it's local name 'Icon' appears to have come from a marketing effort, for rebranding purposes; second, the fact that it looks like an eagle with the beak at the atrium and wings bent like those of an eagle, but that money must have ran out leaving unequal wings; lastly, in relation to the latter, that it was built for Eagle Star Insurance. None of these myths have convincing legitimacy.
- 2.6.2 The 'Icon' nick name is exactly that. The building design is not worthy of the title nor is its form of such a recognisable one that it should be considered iconic.

- 2.6.3 There is no denying that the semi central atrium does look 'beak-like' (see figures 2.23 and 2.24 in Appendix 2) and its distinctive form should logically have the north and south wings of equal length. But money did not run out. The building was planned unequal. We know this because for the north wing to equal the south, it would have extended into the highway. Diagrams produced by my office illustrate this in Appendix 3. Another conjecture is that the south wing was later extended, making it asymmetrical. This is unlikely and there are no signs in the building fabric to support this.
- 2.6.4 In conclusion, the existing building, though of some substance, does not hold the architectural or innovative qualities which would give cause for its retention. Nor does its deep plan lend itself to accommodating another use.

3.0 THE APPEAL SCHEME

3.1 Brief description in overall townscape and design concept terms:

- 3.1.1 The description of the design is set out elsewhere. The purpose of this section is to provide a professional opinion as to the quality of the appeal scheme's design, its appropriateness for the site and the likely success of the spatial conditions it creates. The assessment is based on a thorough visit to the site and the town, consideration of the application drawings and Design and Access Statement, subsequent illustrations and Accurate Visual Representations (AVRs) from rural and town centre positions, which were submitted with the appeal. I have provided advice to Turley on the townscape positions of the views.
- 3.1.2 The design assumes clearance of the site except for the perimeter belt of trees and bushes. Since the intention is to optimise the site, in accordance with Government policy, and to provide a use most in need, i.e. residential, the scheme is one of high, but appropriate, density, but also one with a generosity of open space. The proposal for high buildings, i.e. those substantially higher than the immediate context, as part of the mix of a variety of heights, gives rise to a varied and interesting skyline while providing optimum units and generous open spaces. Every scheme needs to be financially viable and this contributes to the appropriate numbers of units, their size, mix, and typology.
- 3.1.3 The architects have pursued a solution in collaboration with their client and in consultation with the local authority's planning officers. They took reasonable measures to assess heights of buildings which would be compatible with the townscape of the town and set themselves the task of creating a composition of elements which form a compositional whole, which is greater than the sum of its individual parts. By this is meant that the parts, being objectively efficient and simple in form, are juxtaposed in relation to each other such that they create useable and attractive external spaces and interesting collection of forms, which inter-relate together to make a recognisable and coherent composition with visual order and pattern when seen from both close and distant views. I believe this has been achieved with considerable skill and gives the scheme a distinct identity and sense of place.
- 3.1.4 Rather than designing one block and repeating it to compose a rational consistency, the architects have varied the block forms and their heights to form an organic variation

and a lively, undulating form. The more rational approach would have given rise to more height consistency and overall provide a lower scheme. However, this would give rise to monotony and a common uneventful skyline which, by virtue of its consistency, would have expressed a much larger scale within the more open views. Varying the height provides the opportunity for an artistic approach which is discerned and appreciated by people using, experiencing and beholding it. The undulating profile of the composition has a symmetry born out of a central entrance which already exists on the site and is the most practical and efficient approach. This entrance is enhanced by the symmetrical and higher buildings either side. The composition is then continued with lower blocks, with the highest ones at the north and south ends acting like 'book ends'. This arrangement is an elongated 'C' shape in plan with a singular, special central block between the ends of the 'C' shape, opposite the entrance.

- 3.1.5 The undulating form can best be understood and enjoyed from King George V's playing field illustrated in View 7 of Turley's TVIA report. Once understood from such a view, those who live in and know the town will know the composition and, therefore, appreciate its completeness even when they see it from any other point of view, as just a fragment.
- 3.1.6 Such a variety of height requires an understanding of where it will be seen from. Though a townscape study was not required at the application stage, the architects used their judgement along with advice from planning officers in determining the maximum height. I felt it was important to check the visual consequences for the Old Town Conservation Area and, in particular, the setting of the listed buildings in the High Street. Most particularly, the quite low, two storey, Grade II* listed Nos.94-98 High Street (see figure 4.1 in Appendix 4). Views 2 and 3 of Turley's TVIA illustrate that the architects' judgement was highly accurate and that one storey higher would have harmed the setting of the Grade II* listed building and of the High Street in general, and indeed the conservation area. As it is, the small amount of visibility is entirely neutral to those settings and, therefore, to the significance of the heritage assets.
- 3.1.7 Simple though the individual blocks are in their form, the detail is rich. The use of brick in a variety of ways and of different colour, set against the well designed and artistically distributed balconies, provide architecturally rich and lively series of compositions. Equally important is the additional treescape and landscaping design which brings life and richness to the whole composition and a beneficial balance between built form and nature.

3.2 Additional factual assessment

3.2.1 Turley's Townscape and Visual Impact Appraisal (TVIA) study shows the scheme in its context. The landscape architects have also illustrated the likely richness of the landscape as it matures. The architects have produced a series of additional CGIs in the July 2020 'Architects Summary'. All illustrate how successful the spaces and forms that make up the appeal scheme will be.

3.3 Officer recommendation

3.3.1 In the following paragraphs I set out my opinion on the matters relevant to my discipline raised in the Officers' Report to Committee.

3.3.2 I set out the relevant extracts from the Committee Report, which recommended approval:

"5.8.2: The application is accompanied by a Heritage Statement which assesses the impact of the new development upon the significance of the Stevenage Old Town CA and Listed Buildings in accordance with the NPPF, para. 189. The Heritage Statement does not make much reference to the existing building and whether it is of any architectural significance; late 20th century architecture is now being recognised by Historic England through listing. I am in no way suggesting the building is worthy of statutory listing or indeed is of any particular architectural merit but it would be constructive if the heritage statement could consider this".

"5.8.3: (...) At present the application site can be glimpsed from the southern end of the Conservation Area (area 3 as identified in the Conservation Area Appraisal) in views looking west from between buildings, from the Millenium Gardens and from the junction of Ditchmore Lane and Gates Way. However, its relatively low height means it does not form a backdrop to the roofscapes of buildings along Ditchmore Lane although its heavily glazed front elevation does draw the eye. The proposed height of the taller elements of the new development will undoubtedly mean the development is more visible from the southern end of the conservation area when looking west – as illustrated within the Heritage Statement. However, due to the distance from Ditchmore Lane to the site (approx. 100 metres) and the way the site is physically divorced from the Old Town area by the busy Lytton Way, the new development (whilst it will be visible) does not mean it will automatically have a harmful impact upon the significance

of the Conservation Area and Listed Buildings within through development within its setting. Upon careful consideration of the plans put forward, whilst the proposal is not considered to enhance the significance, character and appearance of the Old Town Conservation Area, it is considered to preserve its setting and significance in line with the NPPF”.

“7.4.18: The application has been assessed by the Council’s Conservation Advisor who has assessed the impact of the development of the nearby Old Town Conservation Area and listed buildings. However, due to the distance from Ditchmore Lane to the site (approx. 100 metres) and the way the site is physically divorced from the Old Town area by the busy Lytton Way, it is considered that the new development, whilst it will be visible, will not have a harmful impact upon the significance of the Conservation Area and Listed Buildings through development within its setting. In view of this, whilst the proposal is not considered to enhance the significance, character and appearance of the Old Town Conservation Area, it is considered to preserve its setting and significance in line with the NPPF. Accordingly, it is considered that the proposal will have a less than significant effect on these nearby heritage assets”.

“7.4.19: In conclusion on this issue, taking account of the factors referred to above, whilst it is accepted that the site is an elevated site in a prominent gateway location into the town centre, it is considered that the form and design of the proposed scheme respond imaginatively to the context and constraints of the site. The layout has been carefully designed to introduce a series of tall buildings which respond to Lytton Way and create a high density scheme that would fit in with the existing character of the surrounding area”.

3.3.3 This report is logical, objective, well-written and is an intelligent appraisal of the scheme. It leads to a sound recommendation for approval to the planning committee. I am in full support of its contents. My own assessment of the scheme, in addition to my brief description in section 3.1, follows guidance from various national sources and is set out in section 3.4.

3.4 Assessment based on guidance within the NPPF, NPPG, CABE/Design Council's 'A Design Wayfinder', the National Design Guide, Historic England's 'Advice Note 4 Tall Buildings', and Stevenage Borough Local Plan

National Planning Policy Framework (2019) and Planning Practice Guidance

3.4.1 Section 12 of the NPPF is entitled 'Achieving Well-designed Places'. Its first paragraph (124) states that: *"The creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities"*.

3.4.2 **Paragraph 127 of the NPPF:** *This paragraph includes six bullet points setting out how planning policy should encourage good development. It states:*

"Planning policies and decisions should ensure that developments:

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; and where

crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.”

- 3.4.3 The appeal scheme responds positively to and meets the aspirations in paragraph 127 set out above.
- 3.4.4 The wording in the NPPF gives further support to the appeal scheme because its design responds to the surrounding built environment in this part of Stevenage. It is of high quality and appropriate for its site. It is also a sustainable development. It sets a good precedent for housing in Stevenage. It also increases densities in accordance with requirements to meet housing supply targets.
- 3.4.5 The analysis my consultancy undertook shows how the appeal scheme has been designed to relate to its context and interact with the surrounding heritage assets without leading to harm to their significance.
- 3.4.6 These NPPF paragraphs illustrate how important design is in delivering sustainable development. They illustrate how concerns about incompatibility with existing townscape can be mitigated, in the words of the NPPF, by good design. In effect, design can overcome potential harm which would otherwise occur if a visible building was poorly designed. The quality of design of a building and its response to the surrounding context is a critical part of the justification for its height and visibility.
- 3.4.7 The PPG sets out a number of issues that should be considered in order to achieve good design. These are:
- local character (including landscape setting)
 - safe, connected and efficient streets
 - a network of greenspaces (including parks) and public places
 - crime prevention
 - security measures
 - access and inclusion
 - efficient use of natural resources
 - cohesive and vibrant neighbourhoods

In the context of my evidence, the first bullet is the most relevant. The PPG goes on to say, in respect of local character that *“development should seek to promote character in townscape and landscape by responding to and reinforcing locally*

distinctive patterns of development, local man-made and natural heritage and culture, while not preventing or discouraging appropriate innovation”.

- 3.4.8 I consider the scheme legitimately creates an appropriate character of its own, on a site surrounded by transport infrastructure and, therefore, isolated from a definable context.

CABE / Design Council, A Design Wayfinder (2012)

- 3.4.9 The design assessment that follows illustrates how the appeal scheme has achieved the PPG’s design requirements with reference to design guidance published by the Design Council, an independent charity that merged with the Government’s advisory body on design, CABE, in 2011. The document entitled ‘A Design Wayfinder’ (2012), published by Design Council CABE since the NPPF, sets out a summary of the key principles of good design that should be considered when judging the design quality of a plan or proposals. These principles are drawn from previously published guidance including CABE’s ‘By Design’ (2000), which was withdrawn in 2014, and the Housing Corporation’s Urban Design Compendium (2000). ‘A Design Wayfinder’ provides a useful and objective framework of criteria against which proposals can be judged and is supported by the Planning Officers Society, RTPI, RIBA, and the Landscape Institute. The exercise below shows how comprehensively the appeal scheme has been considered and concludes that it complies with accepted good design practice.
- 3.4.10 The criteria set out under the heading ‘Development Management’ on page 8 of ‘A Design Wayfinder’ are listed in the following paragraphs and the appeal scheme is assessed against each of them.
- 3.4.11 *“Density and mix: this influences the intensity of development, and the effect that will have on both neighbours and the wider area. Will the proposals complement the surroundings?”*

Response: The appeal site is separated from other communities, though seen from them. As a uniquely positioned site between highway and railway line, it will indeed complement and enhance its surroundings. The mix and density proposed is appropriate to the residential context of the site and to its location, being at the edge of the town centre and in close proximity to the train station. The development will be

complementary to the existing and emerging surroundings. There will be no adverse effect on surrounding communities.

- 3.4.12 **“Scale and height:** *the size of the building in relation to its surroundings or the size of the building and its details, particularly in relation to the size of a person – is it human in scale? Height is an important component of the impact of the development on views, vistas and skylines, all important parts of the public realm”*

Response: The proposed scale and height is appropriate for this location and it would have a beneficial effect on views and the skyline of Stevenage, as demonstrated in the TVIA. The residential expression of the designs will give it a human scale. In terms of height, this varies in order to provide an interesting skyline where currently there is a poor one. This is a factor in ensuring a beneficial impact on views.

- 3.4.13 **“Scale and massing:** *the combined effect of the arrangement, volume and shape of a building or group of buildings in relation to other buildings and spaces. Will the proposals be coherent in context?”*

Response: The series of buildings relate well to each other and to the spaces created by them. They are indeed coherent and form a well-composed group.

- 3.4.14 **“Appearance - materials:** *the texture, colour, pattern and durability of materials and how they are used. How do they relate to their neighbours, the local environment and the culture of the place?”*

Response: The domestic material of brick predominates, relating well to other buildings both in the Old Town and New Town. Brick as a material weathers well over the long term. A variety of brick is used with appropriate patterning.

- 3.4.15 **“Appearance - details:** *do the proposals show the craftsmanship, building techniques, decoration, lighting and style of a building. Can the choice of building material and approach be understood?”*

Response: The applicant is committed to carry out the work skilfully and to a high standard of craftsmanship. Other applied elements, such as windows, doors and balconies, will be manufactured off site to a high standard.

3.4.16 The Housing Corporation's 'Urban Design Compendium' (2000 – see paragraph 3.4.9) uses separate criteria to evaluate the quality of urban design. 'A Design Wayfinder' offers a summary of these aspects at page 6. The appeal scheme is assessed against these criteria below.

3.4.17 ***"Create places for people: places that are well used and well loved, safe, comfortable, varied and attractive, and are clear about the extent of the public and private realms"***.

Response: The appeal scheme majors on creating a variety of useable spaces. A large space is created by the 'C' shape plan. Then, there are tertiary spaces between the buildings, each designed and landscaped in a unique way. The proposed spaces are overlooked, which contributes to actual and perceived safety. In addition, a designated children's play space is suitably appointed and landscaped. The scheme retains the existing mature landscaped spaces around the site's perimeter, which will provide an attractive, leafy setting for the development from day one.

3.4.18 ***"Enrich the existing: new development should enrich the qualities of existing places, with distinctive responses that complement its setting, respect the grain of the area and acknowledge local character"***.

Response: The appeal scheme enriches the existing site by reducing the scale from a single office building, with somewhat intimidating large scale characteristics, to that of a series of elements, each displaying a domestic scale. The retention and enhancement of the mature trees within the site make an important contribution to the existing character and appearance of the area, and, in particular, the character of the adjacent routeways.

3.4.19 ***"Make connections: being easy to access, inclusive and permeable, as well as being integrated, physically and visually, with the surroundings"***.

Response: The site is easily accessed from both the Old Town and New Town and connects with the existing well-established pathways and cycle ways. It is, however, surrounded by the railway and highways, limiting its permeability other than within its perimeter.

3.4.20 ***"Work with landscape: striking a balance between the natural and manmade environments, using each site's intrinsic resources with care"***.

Response: The appeal site benefits from an existing rich perimeter landscape, which will be retained and enhanced. New landscaped areas will be created throughout the new spaces, with a rich variety of plants and trees creating a welcome balance between built form and nature.

3.4.21 ***“Mix uses and forms: providing stimulating, enjoyable and convenient places for a variety of demands from a range of users at different times of the day”.***

Response: This is a single use residential development well served by a variety of external spaces of differing character. These provide for a range of needs, both practical and social, for all ages within the envisaged community and their visitors. The proposed mix of parking, pedestrian routes, play areas, and amenity spaces will result in activity throughout the day for a range of users.

3.4.22 ***“Manage the investment: with an economic heart that will ensure that it is well managed and maintained, which helps secure the vitality and viability of the communities in which they sit and the infrastructure that serves those communities”.***

Response: A management company will take care of the common parts and external landscaping in full consultation with the occupants.

3.4.23 ***“Design for change: flexible enough to respond to future changes in use, lifestyle and demography”.***

Response: Residential apartments do not lend themselves to accommodating different uses. A good range of units is provided which should reduce the need for future adaption.

National Design Guide (2019)

3.4.24 The National Design Guide was adopted by the Ministry of Housing, Communities and Local Government in 2019. It 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, including: the layout (or masterplan); the form and scale of buildings; their appearance; landscape; materials;*

and, their detailing". The guidance outlines the Government's priorities for well-designed places in the form of the following ten characteristics:

- Context – enhances the surroundings.
- Identity – attractive and distinctive.
- Built form – a coherent pattern of development.
- Movement – accessible and easy to move around.
- Nature – enhanced and optimised.
- Public spaces – safe, social and inclusive.
- Uses – mixed and integrated.
- Homes and buildings – functional, healthy and sustainable.
- Resources – efficient and resilient.
- Lifespan – made to last.

3.4.25 In the following paragraphs, I consider the appeal scheme against these ten characteristics.

3.4.26 **Context:** Well-designed places are stated to be *"based on a sound understanding of the features of the site and the surrounding context, using baseline studies as a starting point for design; integrated into their surroundings so they relate well to them; influenced by and influence their context positively; and, responsive to local history, culture and heritage"*.

Response: The site's context is of transport infrastructure with Lytton Way, the A602 dual carriageway, to the east and the four track East Coast Main Line railway to the west. The Fairlands Way roundabout is to the south and Trinity Road and Chequers Bridge Road to the north and north-west. A public cycle way bounds the site to the south and east, and on and off-site perimeter tree planting provides the immediate context. This has influenced the layout and design, which is within a semi-shielded environment. The town centre, the Old Town and residential areas form the surrounding context, which will remain unchanged but enhanced by the adjacency of the appeal scheme. A detailed analysis of the site's context is included in the architects' Design and Access Statement of July 2019 that was submitted with the planning application. The appeal scheme has been designed to relate to its context and interact with the surrounding heritage assets without leading to harm to their significance.

3.4.27 **Identity:** Well-designed places are stated to *"have a positive and coherent identity that everyone can identify with, including residents and local communities, so contributing*

towards health and well-being, inclusion and cohesion; have a character that suits the context, its history, how we live today and how we are likely to live in the future; and, are visually attractive, to delight their occupants and other users”.

Response: The development has a strong identity, which is derived from the site’s freedom from an adjacent compelling context or urban grain. Its form and height make it visible from the wider context and its open site approach to management, i.e. there will be no gates, makes it a welcoming place for visitors and a connected place for residents. The combination of enclosure, landscape and an architecture of substance provides a place of wellbeing, which will be visually attractive from within and when seen from the surrounding areas.

3.4.28 **Built form:** Well-designed places are stated to have *“compact forms of development that are walkable, contributing positively to well-being and placemaking; accessible local public transport, services and facilities, to ensure sustainable development; recognisable streets and other spaces with their edges defined by buildings, making it easy for anyone to find their way around, and promoting safety and accessibility; and, memorable features or groupings of buildings, spaces, uses or activities that create a sense of place, promoting inclusion and cohesion”.*

Response: The development is ideally placed to be accessible to public transport and other town centre facilities, in walking distance. The existing cycle track also adds to accessibility. The development will be recognisable through its form and place making, defined by the buildings as a memorable grouping and sense of place.

3.4.29 **Movement:** A well-designed movement network defines a clear pattern of streets that *“is safe and accessible for all; functions efficiently to get everyone around, takes account of the diverse needs of all its potential users and provides a genuine choice of sustainable transport modes; limits the impacts of car use by prioritising and encouraging walking, cycling and public transport, mitigating impacts and identifying opportunities to improve air quality; promotes activity and social interaction, contributing to health, well-being, accessibility and inclusion; and, incorporates green infrastructure, including street trees to soften the impact of car parking, help improve air quality and contribute to biodiversity”.*

Response: The proposed layout is optimum in providing a clear pattern of large open and small intimate spaces to satisfy diverse needs. Cars are accommodated, but

walking, cycling and use of public transport nearby negate their regular use. The central space allows the occupants to meet each other and the smaller spaces allow for more intense social interaction. These, and the whole site, are defined by rich landscape, which will improve air quality as well as a softening of the built form.

3.4.30 **Nature:** Well-designed places are stated to “*integrate existing, and incorporate new natural features into a multifunctional network that supports quality of place, biodiversity and water management, and addresses climate change mitigation and resilience; prioritise nature so that diverse ecosystems can flourish to ensure a healthy natural environment that supports and enhances biodiversity; provide attractive open spaces in locations that are easy to access, with activities for all to enjoy, such as play, food production, recreation and sport, so as to encourage physical activity and promote health, well-being and social inclusion*”.

Response: The landscape architecture is well detailed and takes into account the creation of ecosystems and biodiversity as well as sustainability and water management. The landscape architects’ documents that were submitted with the planning application and the Appeal provide more detail on this.

3.4.31 **Public spaces:** The guidance states that the quality of the spaces between buildings is as important as the buildings themselves. The section on public spaces refers to streets, squares, and other spaces that are open to all and that when they are well-designed, they “*support a wide variety of activity and encourage social interaction*”, they “*feel safe, secure and attractive for all to use; and have trees and other planting within public spaces for people to enjoy*”.

Response: While the spaces created within the development are essentially private, they are shared by the occupants and their visitors as though they are public. The building layout provides an outer landscaped perimeter, an inner defined large communal space and a variety of more intimate spaces. These spaces will be managed so that people are encouraged to use them through their attractiveness and harbouring of nature.

3.4.32 **Uses:** Well-designed places are stated to have “*a mix of uses including local services and facilities to support daily life; an integrated mix of housing tenures and types to suits people at all stages of life; and, well-integrated housing and other facilities that are designed to be tenure neutral and socially inclusive*”.

Response: Though essentially a single use residential community, the development provides a rich mix of unit sizes and tenures, all of which will facilitate a sustainable community through the shared use of external spaces. Local services and facilities to support daily life are all located within close proximity of the site.

3.4.33 **Homes and buildings:** Well-designed homes and buildings are stated to “*provide good quality internal and external environments for their users, promoting health and well-being; relate positively to the private, shared and public spaces around them, contributing to social interaction and inclusion; and, resolve the details of operation and servicing so that they are unobtrusive and well-integrated into their neighbourhoods*”.

Response: All apartment layouts meet national standards and their shared circulation spaces are appropriate. Private external amenity, by way of balconies, and shared amenity is clearly defined through an animated landscape scheme. Operational and service facilities are generous and well placed not to compromise the potential for social interaction and inclusion.

3.4.34 **Resources:** Well-designed places are stated to “*have a layout, form and mix of uses that reduces their resource requirement, including for land, energy and water; are fit for purpose and adaptable over time, reducing the need for redevelopment and unnecessary waste; use materials and adopt technologies to minimise their environmental impact*”.

Response: The layout design is an optimum solution for the site and an efficient use of land, in terms of land resource. It is intended that the site remains for residential use in perpetuity, reducing the need for further development in the future. The sustainability of the development is dealt with by the architects.

3.4.35 **Lifespan:** Well-designed places, buildings and spaces are stated to be “*designed and planned for long-term stewardship by landowners, communities and local authorities from the earliest stages; robust, easy to use and look after, and enable their users to establish a sense of ownership and belonging, ensuring places and buildings age gracefully; adaptable to their users’ changing needs and evolving technologies; and, well-managed and maintained by their users, owners, landlords and public agencies*”.

Response: Occupants will be given the opportunity to take part in the management of the common parts and to feel a sense of ownership over it. The landscape will mature

over time and robust species of plant have been chosen to optimise the landscaping opportunity. Brickwork of varying shades and textures are proposed to ensure long term durability and enhanced weathering.

Historic England (HE) 'Advice Note 4: Tall Buildings' (2015)

3.4.36 As the proposed development is up to 16 storeys, which will be substantially higher than its wider context, I now consider the appeal scheme against HE's guidance on tall buildings. Naturally HE's guidance focuses on, in their words, "how the value of heritage assets may be affected, and how *the heritage conservation objectives within legislation and national policy can be best achieved*" (p.1).

3.4.37 The guidance goes on to state that "*if the building is not in the right place and well designed a tall building, by virtue of its size and widespread visibility can also seriously damage the qualities that people value about a place*". (para. 1.2, p.2).

Response: By making this statement HE are correctly accepting that well designed tall buildings can be appropriate. I would go so far to say that if a tall building is considered to be "*not in the right place*" then it is highly likely that the design does not relate suitably to its context, unlike the appeal scheme. The appeal scheme is an example of a well-designed series of buildings, which are also well suited to their context. It is, in my view, in the right place.

3.4.38 HE's view is that historically "*one of the principal failings in the design of tall buildings was a lack of understanding of the nature of the area around them, and the impact they would have on both specific features of the historic environment and its general character*".

Response: This is demonstrably not the case for the appeal scheme. As my evidence illustrates, the design of the appeal scheme was developed explicitly in response to an understanding of the site and its surrounding townscape and the potential impact which it may make.

3.4.39 At paragraph 4.8 of the guidance HE note that delivering architectural quality involves consideration of a range of design criteria. Taken together, these criteria, set out from (a) to (i), provide another useful framework for assessing the proposal in an objective

way, although HE provide only key words for consideration. I consider the HE design criteria below.

3.4.40 (a) Scale; (b) Form and massing; (c) Proportion and silhouette

Response: The overall scale of the appeal scheme is not uncommon in the town. Its scale, in relation to its various parts, has been determined compositionally with an artistic component. Thus the varied heights of blocks and within blocks is ordered according to their immediate neighbours and according to the composition as a whole. In this way, the scale relationships create a visual harmony. This is reflected in the form, massing and lively silhouette. Proportion is introduced into the elevations by the arrangement of the fenestration and placement of balconies. This also has a harmonious appearance.

3.4.41 (d) Facing materials; (e) Detailed surface design

Response: The use of different coloured and, occasionally, patterned brickwork gives the appearance of tradition and substance. The choice of materials is derived from the wider built context.

3.4.42 (f) Relationship to other structures;

Response: There are few structures of sufficient adjacency or merit to require a specific approach, however, I consider the architects have related the appeal scheme very appropriately to the character of the town as a whole.

3.4.43 (g) Impact on streetscape and near views; (h) Impact on cityscape and distant views; (i) Impact on the skyline

Response: The impact on the immediate streetscape is limited by the boundary planting and the high volume of use of the dual carriageway, which constitutes the 'street'. Views have been constructed to illustrate the visibility and quality of the composition from near and distant positions. Where a skyline arises in views, it is one of varied richness and compositional value and meaning, by which I mean the development's distribution of form and space can be interpreted from a full experience of the proposed skyline.

Stevenage Borough Local Plan 2011-2031 (2019)

3.4.44 Stevenage Borough Local Plan was adopted in 2019 and forms the Development Plan for the borough. The Local Plan sets out the Council's planning framework for the borough, identifying the main issues that are likely to affect Stevenage and sets policies to deal with them. It covers the period 2011-2031.

3.4.45 The Plan sets out Policy GD1, which relates to high quality design. The policy lists the design requirements that will be applied to all development. In the following paragraphs, I consider the appeal scheme against these requirements. The policy states that "*planning permission will be granted where the proposed scheme (as applicable)*":

3.4.46 "*a. Respects and makes a positive contribution to its location and surrounds*"

Response: As illustrated in the TVIA, the appeal scheme will make a positive contribution to its location and surrounds, establishing a living community with a positive identity.

3.4.47 "*b. Improves the overall ease of movement within an area for all users*"

Response: The scheme will enhance the site's accessibility and provide routes to all its parts.

3.4.48 "*c. Creates a safe environment that designs out crime*"

Response: All proposed spaces will be overlooked and designed for communal use.

3.4.49 "*d. Creates, enhances, or improves access to, areas of public open space, green infrastructure, biodiversity and other public realm assets*"

Response: The appeal scheme provides new open spaces with designed landscape that enhances biodiversity.

3.4.50 "*e. Does not lead to an adverse impact on the amenity of future occupiers, neighbouring uses or the surrounding area*"

Response: The appeal scheme has been designed for residential use. It will positively affect the amenity of future occupiers and the surrounding area and would not lead to adverse effects.

3.4.51 *“f. Complies with the separation distances for dwellings set out in this plan”*

Response: The separation distances provided between the blocks is appropriate.

3.4.52 *“g. Minimises the impact of light pollution on local amenity, intrinsically dark landscapes and nature conservation”*

Response: The light emitted from the appeal scheme will indicate a living community without imposing light spillage on other areas.

3.4.53 *“h. Incorporates high quality boundary treatments when located on the street frontage”*

Response: The existing well planted boundaries will be enhanced.

3.4.54 *“i. Complies with other relevant policies and has regard to guidance which may influence site layout and design, including (but not necessarily limited to): (i) Requirements relating to active frontages in Policy EC5; (ii) The parking and access standards in Policy IT5 and the Parking Provision SPD; (iii) Site-specific considerations identified in Policies H01, H02, H03 and H04; (iv) Housing mix requirements in Policies HO8, HO9 and H10; (v) Accessibility requirements in Policy HO11; (vi) SuDs and flood risk considerations in policies FP1 and FP2; (vii) Open space standards in Policy NH7; and (viii) Conservation area guidance in Policy NH10”*

Response: All other relevant policies have been fully taken into account where appropriate.

3.4.55 *“j. Meets the nationally described space standards”*

Response: The appeal scheme meets the nationally described space standards.

3.4.56 *“k. Makes adequate provision for the collection of waste”*

Response: The waste collection will be appropriately managed.

3.4.57 *“I. Has regard to the Stevenage Design Guide Supplementary Planning Document and any other appropriate guidance”*

Response: The appeal scheme satisfies the Stevenage Design Guide SPD and all other appropriate guidance.

4.0 REFLECT ON EFFICACY OF REASONS FOR REFUSAL

4.1 Committee decision – Reasons for refusal

- 4.1.1 Three reasons for refusal were set out in Stevenage Borough Council's decision notice in relation to the appeal scheme. The first two relate to the height, design and appearance of the appeal scheme and are included below:

“The proposed development by virtue of its height, design and appearance would result in an incongruous form of development which would be harmful to the visual amenities of the area. The proposal would, therefore, be contrary to policies SP7, SP8 and GD1 of the Stevenage Borough Local Plan 2011-2031 and the advice in the National Planning Policy Framework 2019 and the Planning Practice Guidance 2014 relating to high quality design”.

“The proposal comprising 576 dwellings in 7 flatted blocks on this constrained site would result in an overdevelopment of the site which would be harmful to the character and appearance of the area. The proposal would, therefore, be contrary to policies SP7, SP8 and GD1 of the Stevenage Borough Local Plan 2011-2031 and the advice in the National Planning Policy Framework 2019 and the Planning Practice Guidance 2014 relating to high quality design”.

4.2 Commentary

- 4.2.1 The Committee reached these conclusions without clear evidence to support the claims and to the contrary of advice given by their planning officers. The decision was made based on the belief that the scheme was too high and too dense for Stevenage. Through the combined work of the applicant's expert consultants and their additional studies, the evidence now exists, and should reassure the decision maker that a more positive conclusion can be made.

5.0 CONCLUSION

- 5.1 In this evidence I have established the origins of the appeal site in the context of the New Town masterplan, the adaptability of that plan to accept the current building and its HQ office use, and ironed out some myths about the building which reduces it to an ordinary redundant building. The redevelopment of the site for much needed housing and its ideal proximity to the town and the station is thus fully justified.
- 5.2 I have considered the design concept, its spatial arrangement, form, use of materials, landscaping and visual effects and have reached the same conclusion as the Council's planning officers that it should be given approval. This has been backed up by the thorough townscape and visual assessment work carried out by Turley, which indicates from where the proposed development will not be seen and from where it will, the latter illustrating its townscape and landscape virtues. In particular, the good judgement by the architects and planners on height, the artistic and orientational approach to composition and the resultant successful silhouette and outline of the scheme in long views. In the latter case, the identity and sense of place established on site can be recognised and interpolated from such views. This is a further visual attribute.
- 5.3 The professional judgements I have made, and those made by the planning officers, are then backed up by my assessments against policy, guidance and advice using the NPPF, the NPPG, CABE/Design Council's 'A Design Wayfinder', the National Design Guide, Historic England's High Buildings Note, and the Stevenage Borough Local Plan. These set out objective criteria to which I have added objective responses.
- 5.4 Taking these considerations into account illustrates why the Council's disregard of their officer's recommendation and unsubstantiated refusal of the scheme was misjudged and a mistake. It is with this belief that I can confidently recommend to the Inspector for this appeal that, assuming other matters outside the scope of my evidence are satisfactorily resolved, the appeal scheme should be approved.