

Summary proof of evidence in relation urban design matters

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for Newark and Sherwood District Council

20/00873/FULM

Residential development of 103 dwellings an associated access and infrastructure.
Field Reference Number 7108, Eakring Road, Bilsthorpe, Nottinghamshire.

The following summary is extracted from the main proof:

3.0 Part Three: Summary and conclusions

- 3.1 It is my professional opinion that the proposed design response is not reflective of good urban design practice; and is not consistent with national and local policies relating to urban design quality specifically those relating to local character, response to context, encouraging active lifestyles and providing connections between people and places.

This has been demonstrated by identifying a series of site specific design principles (please refer back to Paragraph 2.77) and considering the design quality of the proposals against these and the Building for a Healthy Life methodology. A critique of the design process has also been offered (please refer back to Paragraph 2.3).

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

The proposals will remove the opportunity for the site to continue an important function within the settlement by offering recreational opportunities and providing connections into, across and beyond the site to other places within the settlement and further afield. A further important opportunity is for the development proposals to reflect basic principles of good urban design.

The proposals offer no contribution to the enhancement of the landscape character zone and the creation of new features that respond to the relevant policies, specifically ‘Create’.

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

- 3.4 The critique of the Design and Access Statement and the design process highlights key weaknesses in three of the four key design stages:

- Assessment.
- Evaluation.
- Design.

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

It is my professional opinion that the failure of the appellant to complete a robust assessment of the site and its context; combining this assessment with urban design policies and good practice to identify a series of site specific design principles (please refer back to Paragraph 2.77) is the root cause of design failure. These failures were further compounded by the absence of evidence to demonstrate the exploration and testing of options.

3.6 No less than twelve of thirteen opportunities (site specific design principles/indicators of design quality) have been overlooked in the creation of the development proposals:

- **Respect and improve existing informal footpaths, integrating these into new streets and spaces; setting these into generous landscaped corridors; as well as anticipating and responding to new desire lines.**

The failure of the scheme to positively respond to this opportunity is not consistent with the requirements of the NPPF, National Design Guide and Building for a Healthy Life¹. Building for a Healthy Life states,

“draw points of connection into and through your site - creating a strong and direct street, path and open space network” (p.14); with ‘What ‘green’ looks like’ being explicit in requiring schemes to “respond to pedestrian and cycle desire lines” (p.17).

- **Provide two inclusive crossing points across Eakring Road Provide crossing points across Eakring Road.**

The failure of the scheme to positively respond to these opportunities is not consistent with the requirements of the NPPF, National Design Guide and Building for a Healthy Life. Building for a Healthy Life states,

“ensure access for all” (p.20) and “streets that are easy to cross... think about how people with visual, mobility or other limitations will be able to use the street confidently and easily” (p.62); with ‘What ‘green’ looks like’ being explicit in requiring schemes to provide “zebra... and signalised crossing” (p.23). ‘What red looks like’ specifically states that this is merited where a development fails to, “respond to existing (or anticipate future) pedestrian desire lines” (p.19).

¹ See table in Building for a Healthy Life (page 7) that shows the relationship between the 12 considerations, NPPF and the National Design Guide.

- **Explore the opportunity to provide a limited number of new homes along Eakring Road with direct access as part of a wider strategy to calm vehicle speeds.**

The failure of the scheme to positively respond to this opportunity is not consistent with the requirements of the NPPF, National Design Guide and Building for a Healthy Life. Building for a Healthy Life states,

“low-speed streets... the right balance between movement and place functions...[the need to] avoid streets that are just designed as routes for motor vehicles to pass through” (p.62). ‘What ‘red’ looks like’ is explicit in highlighting the need to avoid “restricted frontage access” (p.55).

- **Offer strong visual connections across the site from Eakring Road to the wooded embankment.**

The failure of the scheme to positively respond to this opportunity is not consistent with the requirements of the NPPF, National Design Guide and Building for a Healthy Life. Building for a Healthy Life requires designers to,

“identify any visual connections into, out, through and beyond the site... identify opportunities to integrate and reuse existing features of value... on or beyond the site” (p.38).

‘What ‘red’ looks like’ is explicit in highlighting the need to avoid “building orientations and designs that fail to capitalise on features” (p.43).

- **Provide a connected street and movement network.**

The failure of the scheme to positively respond to this opportunity is not consistent with the requirements of the NPPF, National Design Guide and Building for a Healthy Life. Building for a Healthy Life highlights the importance of,

“look[ing] beyond the red line that marks the extent of your site... stitch a new development into a place... identify the places... you need to connect to... draw points of connections into and through your site – creating a strong and direct street, path and open space network” (p.14). It continues in ‘what green looks like’ to highlight the need for “edge to edge connectivity” (p.17) and the need to “respond to pedestrian... desire lines... safeguarding existing.... Movement corridors” (p.17).

Under ‘*What red looks like*’ Building for a Healthy Life is clear and unambiguous in stating that a ‘red’ light is merited where a development fails to, “*respond to existing (or anticipate future) pedestrian desire lines... internal streets and paths that are not well connected or are indirect*” (p.19). A ‘red’ light is a prompt to “*stop and think*” (p.19).

- **Integrate car parking into the street environment, anticipating and reducing the risk of displaced car parking.**

The failure of the scheme to positively respond to this opportunity is not consistent with the requirements of the NPPF, National Design Guide and Building for a Healthy Life. Building for a Healthy Life highlights the importance of,

“integration of car parking into the street environment... guarding against displaced and anti-social parking” (p.68) with ‘*what red looks like*’ stating, “*over-reliance on tandem parking arrangements... failing to anticipate and respond to displaced and other anti-social parking*” (p.73).

- **Create a place that reflects or reinterprets Garden Suburb/Corporation Suburb ideals.**

The failure of the scheme to positively respond to this opportunity is not consistent with the requirements of the NPPF, National Design Guide and Building for a Healthy Life. Building for a Healthy Life highlights the need to,

“create a place with a locally inspired or otherwise distinctive identity” and requires that designers, “*delve deeper than architectural style and details... understand where positive local character comes from*” (p.44) with ‘*what green looks like*’ stating the importance of “*structural landscaping as a way to create places with a memorable character*” (p.47).

- **Ensure blocks of development positively address streets, spaces and edges; with homes facing onto the eastern boundary.**

The failure of the scheme to positively respond to this opportunity is not consistent with the requirements of the NPPF, National Design Guide and Building for a Healthy Life. Building for a Healthy Life highlights the need for,

“perimeter blocks... active frontages” (p.50) with “*front doors that face...public spaces*” and “*building typologies that are designed to straddle*

narrow depth blocks” (p.53). With ‘*what red looks like*’ being explicit that indicators are “*broken or fragmented perimeter block structure*” (p.55).

- **Restore, lay and/or replant the western hedgerow.**

This could be achieved by way of a condition.

- **Recognise the importance of views into the site when approaching the site from the north along Eakring Road.**

And:

- **Respond to the “Landscape Actions – Create” in the Newark and Sherwood Landscape Character Assessment SPD (Mid-Nottinghamshire Farmlands; Policy Zones MN PZ 24 MN PZ 27 (p.204 & 218).**

And:

- **Respond to the gateway location and the policy aspirations to secure a transitional development (see Paragraph 2.44)**

The failure of the scheme to positively respond to these opportunities is not consistent with the requirements of the NPPF, National Design Guide and Building for a Healthy Life.

Taking into account the Newark and Sherwood Landscape Character Assessment SPD (see Paragraph 2.46) and the need to ‘Create’, a clear opportunity exists to use new tree planting both along the site’s northern boundary and within the rest of the development site to increase tree cover. Over time this would result in view and a roofline punctuated by tree canopies rather than one of only tiled roofs to houses.

Building for a Healthy Life highlights the importance of, “*structural landscaping as a way to create places with a memorable character*” (p.47) and the need to “*identify any visual connections into, out, through and beyond the site*” (p.38).

Suggest how the retail scheme should relate to the residential development.

The failure of the scheme to positively respond to these opportunities is not consistent with the requirements of the NPPF, National Design Guide and Building for a Healthy Life.

Building for a Healthy Life requires designers to, “*look beyond the red line that marks the extent of your site...[to] stitch a new development into a place... identify the places, facilities and services you need to connect to*”

which in turn will “avoid creating isolated and disconnected places that are not easy places to move through and around” (p.14).

A good design response (as opposed to a poor design response) would respond positively to most if not all of these opportunities.

The Building for a Healthy Life assessment demonstrates significant and major design shortcomings with six ‘red’ warning lights.

- 3.7 Whilst a stronger design approach would have informed housing typologies, designs and numbers, it is considered that even if these standard house types are accepted as fixed elements, homes can be arranged in a different way that offer a higher standard of design, resolving many of the design issues raised in this Proof of Evidence.

A stronger and more contextually appropriate design response could be achieved by using building typologies and forms that offer some relationship to the adjacent suburb; although this in itself does not preclude a better standard of design from being achieved.

- 3.8 The alternative design propositions prepared by Mr. Garry Hall of Urban Forward Limited demonstrate that there are ways to respond better to site and contextual features and basic urban design principles, such as perimeter block structure.
- 3.9 This proof of evidence has identified multiple failures in the design process and weaknesses in the design quality of the development proposals.

On the basis that the development fails to take the opportunities available (NPPF, Paragraph 130) and fails to respond positively to urban design policies and good practice (as demonstrated by considering the design process against guidance produced by CABI (please refer back to Paragraph 2.3) and the Building for a Healthy Life methodology) it has been clearly demonstrated that the proposals submitted by the appellant are not compliant with national and local policies (and good practice) relating to urban design quality.