

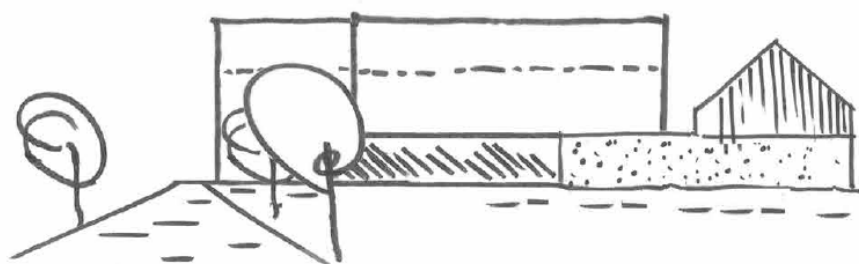
Proof of Evidence relating to design matters

Project Ref.:	Former Stanmore and Edgware Golf Centre, Brockley Hill
Location:	Brockley Hill, Stanmore
Issued By:	Adam Thornton
Revision.:	Final
Date:	13/09/2022

1. I, Adam Thornton, am a Founding Director of 5plus Architects. I am a member of the RIBA, a Lecturer at London Metropolitan University and an External Examiner of Professional Practice at both The University of Nottingham and London Metropolitan University.
2. I studied at The University of Nottingham, where Architecture is read as part of the Faculty of Social Sciences. This meant that we studied alongside planners, geographers and urban designers. I qualified as an Architect in 1999.
3. In my professional career I have worked at several architectural practices with a leisure and hospitality specialism including Broadway Malyan and HKR Architects before founding 5plus Architects. I have experience in both the design of hotel / leisure environments such as the Hart Hotel, Shoreditch and Royal London House Finsbury Square. These were both sensitive contextual designs within conservation areas. In addition, I have extensive experience in masterplanning and development at the edge of urban settlements.
4. 5plus Architects are an award-winning Architectural practice. 5plus is accredited to ISO9001 to ensure quality is achieved consistently across all projects.

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Section 01 - Scope of Evidence

5. This Proof of Evidence concerns Appeal Ref APP/M5450/W/22/3299650 - Stanmore & Edgware Golf Centre, Brockley Hill, STANMORE, lodged in respect of the application for planning permission refused by the London Borough of Harrow in November 2021 (London Borough of Harrow Planning Reference P/3088/20).
6. The Inspector set out the main issues at the Case Management Conference (CMC) on 22 August 2022. This proof will address the second main issue relating to the effect of the development on the character and appearance of the area, from a design perspective.
7. The purpose of this proof is to:
 - i. set out the evolution of the design of the buildings contained in the Appeal scheme;
 - ii. present in precis the scheme being considered in this appeal;
 - iii. address the issues that arise from Reason for Refusal 2 (RfR2), specifically relating to character and appearance;
 - iv. assess compliance with policy and relevant guidance;
8. It will be demonstrated through a process of clear analysis and conceptual development that the proposals put forward within the submitted plans (**CD 21-39**) and Design and Access Statement (**CD 48-51**) associated with the application constitute a wholly appropriate and sustainable design response to policy and guidance and for the site.

Section 02 - Appointment

9. I was appointed in September 2019 to develop designs for a new Banqueting Facility on the site of the former Stanmore & Edgware Golf Centre on Brockley Hill.
10. A suitably full description of the site and the surrounding area is including in the Appellant's Statement of Case (**CD 82**).

Section 03 - The Brief

11. From the outset the brief was to provide a high-quality design for a new Asian wedding / banqueting facility to replace the client's existing facility on Canning Road in Harrow.
12. The vision for the site had been clearly set from the outset as a wedding venue to replicate and improve on the existing space; for example, both the kitchen spaces and toilet facilities were considered too small in the existing facility. At the centre of the proposal is the cultural offer which is unique in Harrow, and was captured in the early documents as illustrated in figure 01 below.

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3.2 The Brief Part of Harrow's Cultural Offer

A Celebration of Colour with Family, Friends and Loved Ones.

The Banqueting Venue will provide the client and host with the ability to decorate and create an event in line with their personal preferences.

This building will provide the backdrop and organisational structure to Celebrations of any kind.

A Celebration of Forever and Ever. A Celebration through Presentation and Style. The Space used as a backdrop.

The people move into the foreground supported by the space in the background.

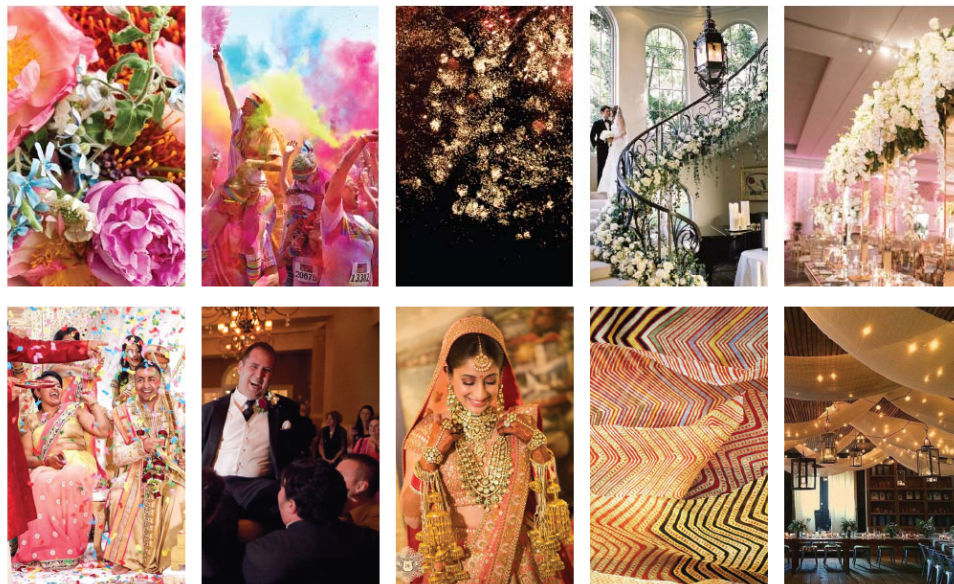


Figure 01 – Extract from Brief within initial Design Presentation to Council

13. In terms of facilities, I worked with the client to agree the minimum accommodation requirements, with a desire to keep as many facilities as possible on the single level for accessibility and practicality of service. It was also agreed that the building should be sustainable and consider lifetime carbon.

Section 04 - Evolution of the Scheme

14. This site gave the opportunity to design a bespoke wedding venue based on the exact needs of the users of the building, whilst at the same time being carefully considered to be sited in the context of this previously developed Green Belt site.
15. At the heart of the design was the recognition that the venue would be used and experienced in different ways depending on your relationship to the wedding. These categories were broken down into:
 - i. The wedding party / bride and groom
 - ii. Wedding guests
 - iii. The supporting staff for the event
 - iv. Day to day management and Deliveries.

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4.2 Design Development and Consultation

Making the Day a success

The client has over 15 years experience in organising wedding days for their clients. They understand that for the day to be a success, the organisation behind the scenes must be impeccable. This building type is therefore heavily driven by process and adjacency.

The building programme and spaces will be occupied by different user groups at different times. They will essentially occupy either the Front of House or Back of House spaces. Access to the Front of House and Back of House will be kept separate from each other.

The success of events held in the Front of House and Banqueting area rely on the successful operation of the Back of House activities.

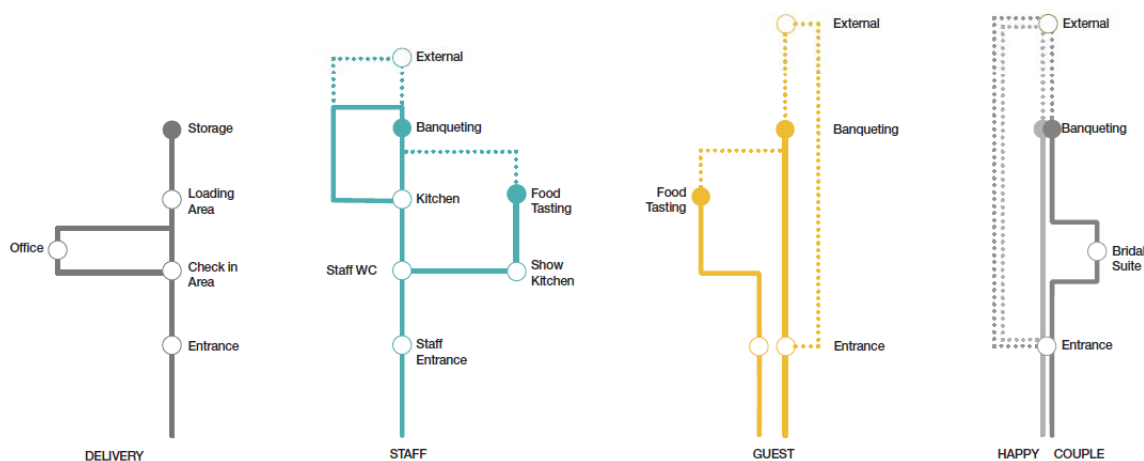


Figure 02 – Designed with people at the centre.

16. Given both the Green Belt context and the desire for colourful celebration to the inside, the concept has always been based on a geode; natural on the outside but sparkling on the inside. This is the genius of the concept of using natural materials on the outside of the building that complement the Green Belt setting, whilst allowing for a colourful and decorative interior.



Figure 03 – Geode concept image

17. In order to ensure the external design was appropriate to the local character and appearance, a contextual study was undertaken. The summary of this study is shown below. The local area consists primarily of two-storey buildings, with a regular occurrence of gable ends facing the highway. Roof pitches vary from 30 degrees to 60 degrees.

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3.5 Site Analysis

Local Domestic Vernacular

A review of the local vernacular has been undertaken to establish the most appropriate form for the building. As can be seen, there is a prevalence of pitched roofs and gable ends. The vernacular is not dissimilar to the existing building on site shown earlier.

In terms of materiality there is a large existing palette of materials used, ranging from brick and slate / tile to render, stone and timber cladding.

Images

1. Jukes Green Way
2. Pipers Green Lane
3. Brockley Hill
4. Brockley Hill
5. The Gables, Alum Lane, Ektwe
6. Pipers Green Lane

Interpretation of materials applied to buildings in proximity to the site

7. Brick of varying shades used to provide external wall cladding at low level plinth or throughout.
8. Stone cladding applied in key locations as part of the main building or surrounding low level walls.
9. Uniform Timber cladding.
10. Timber cladding varying shades of colour and texture.
11. Render panels in selective areas providing crisp corners and detailing.
12. Render panels with texture.
13. Ceramic roof tiles in varying shades.
14. Slate roof tiles in varying size and form.
15. Metal window frame.

Figure 04 – Extract from Page 22 of the Design and Access Statement

18. The design was conceived as a series of buildings, each taking on a distinct function; Front of House, Back of House, Banqueting space. This allows for the forms to be treated as a series of outbuildings in keeping with this previously developed site.

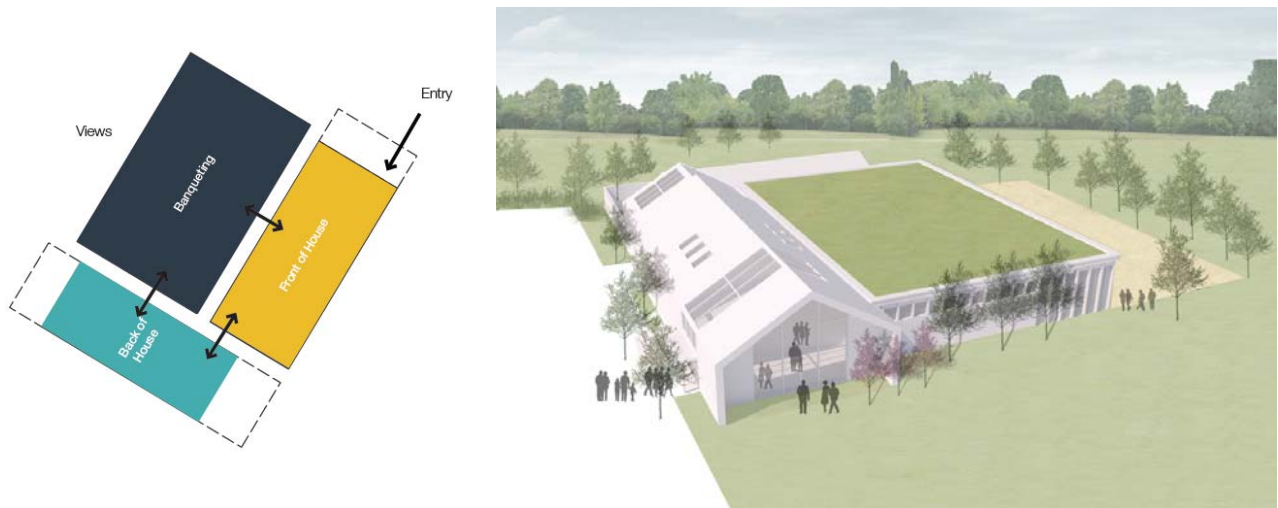


Figure 05 – Extract from Design and Access Statement Page 35 and from Pre-App 1 page 62

19. As can be seen by the plan arrangement and 3D massing above, the original concept was for a collection of single and 2 storey buildings; the entrance was signified by the two-storey gable end, immediately visible from the site entrance to assist with intuitive way finding.
20. The scheme design has benefited from the full support of a range of other consultants to ensure good design co-ordination with regard to landscape, visual impact, sustainability, ecology, archaeology, drainage, traffic, fire safety, and life cycle assessment.
21. A robust pre-application process was undertaken with the Local Authority which demonstrates the applicant's willingness to have an open and robust discussion about the design and to develop the design of the scheme to the satisfaction of the Local Authority, as set out below:
- i. Pre-application 1 was undertaken on 3 March 2020.
 - ii. Pre-application 2 was undertaken on 10 March 2020.
 - iii. Pre-application 3 was undertaken on 4 June 2020.
22. In terms of the evolution of the design and massing of the building, this process led to the reduction in footprint, volume and height of the building, and a re-positioning of the building further south onto the previous raised podium steps of the golf club building.

23. The scheme was reviewed by the Local Authority's Design Review Panel on 25 June 2020. Feedback received 10 July 2020 records that the building design was successful in reducing visual presence on the surrounding context but urged the Applicant to review the ceremonial procession through the building. There was a clear tension in the verbal feedback at this panel; on the one hand the DRP proposed that the building would benefit from being given some space and pulling the buildings apart a little to explore courtyards. The members of the Local Authority planning team present suggested that there was a need to ensure as compact a form as possible given the Green Belt context. On balance it was felt that the compact form was the correct approach, and this is what has been submitted.
24. The other important discussion at the Design Review Panel centred on the relationship between the inside and outside of the building. The positive external western space was currently blocked from the main banqueting functions by the back of house building originally sited to the west of the hall. Similarly there was a conflict with deliveries traversing the whole of the car park. The review instigated a very positive shift of the back of house building to the east and towards the highway; this improved massively the relationship of the building to its immediate external environment.
25. The design to this point had been compared to the existing Golf Club building, which then suffered a fire. However, the ridge height of the building and the two side wing structures are still in place on the site and have considerable presence.
26. The scheme was reviewed by the GLA Design Review Panel on 29 July 2020. Feedback received 27 August 2020 records that the proposal has clearly benefitted from engagement with the Borough's pre-application process and Design Review Panel. In terms of architectural quality, the feedback confirms that the simple approach to building forms and the aspiration to achieve BREEAM Excellent are welcomed.
27. Pre-application 4 was undertaken on 6 August 2020. This scheme was further developed to respond to GLA feedback. The proposal had a footprint of 1,108 sq.m, a total floorspace of 1,458 sq.m
28. Post submission of the application, it can be demonstrated that most of the further information provided was not focused on the design of the scheme as this was already well established and considered acceptable.
29. A Councillor Presentation 24 August 2020 where no design concerns were raised
30. A Residents Presentation 7 September 2020 where no design concerns were raised. Concerns were primarily about noise and parking.

Section 05 - The Proposed Appeal Scheme

31. The architectural design of the Appeal scheme is set out in detail in both the submitted Design and Access Statement (**CD 48-51**) and the accompanying drawings (**CD 21-39**).
32. As set out in Paragraph 16 of the National Design Guide, well-designed places and buildings come about when there is a clearly expressed 'story' for the design concept and how it has evolved into a design proposal. In my opinion the Design and Access statement (**CD 48-51**) clearly sets out this story, helping to reinforce this exemplary design. I have outlined key aspects of this narrative below.
33. The initial impression given as you enter the site from Brockley Hill is captured in the visual below; the venue presents itself as a collection of buildings, breaking down the mass to be appropriate to the locality. The use of the dominant two storey gable end facing the highway clearly indicates the entrance. This is important for a venue such as this that is mainly visited by guests for the first time. A clear entrance sequence is very important to help intuitive wayfinding and reduce the need for signage.



Figure 06 – Artists Impression of the Appeal Site Application

34. The original concept of three buildings containing the three functions is retained. This gives clarity to the architectural form and expression. The principal arrangement of the building is very clear, with each function of the building very clearly expressed. These three functions are considered as follows:
- i. **Front of House** – a 2 storey arrival building, with entrance, cloaks and procession to reception spaces. This building also contains the administration / meet greet and some meeting facilities. In terms of out of hours use, reduction of energy and cleaning, this building can be operated independently. It is located in a prominent location with gable to the road to make entry to the suite of buildings intuitive.
 - ii. **Back of House** – This is the service building. It is single storey and contains the kitchens, deliveries, storage, and staff welfare facilities. It is located closest to the road to facilitate easiest deliveries from the entrance with minimum conflict. A green wall is provided adjacent to this building to help visually separate some of the external back of house functions from the visitor entrance sequence.
 - iii. **Banqueting Space** – The banqueting space is clearly expressed as an honest, open, clear span space, nestled between the two above buildings. The space is best provided column free, with a deeper roof structure needed. This 4-sided space connects on one side with the food service, on one side with the guests / reception and toilets, and on two sides with the well-considered landscape.
35. Each of these functions and spaces has an excellent relationship with the external space, and therefore an immediate connection to the landscape and views, demonstrated in the diagram below. The Front of house and Banqueting buildings benefit from the western late afternoon and evening sun.

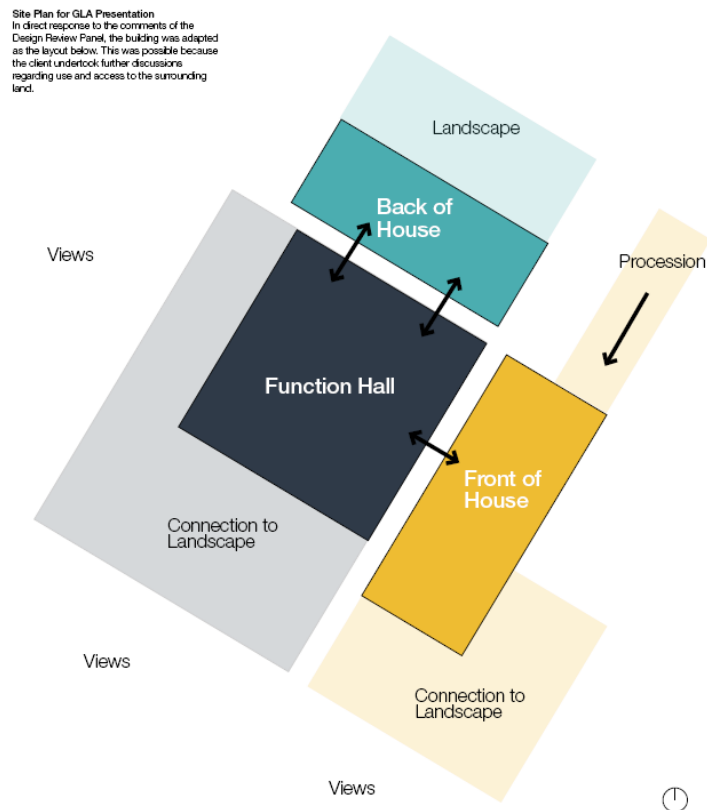


Fig 07 – Extract from Page 35 of the Design and Access Statement (CD 48-51)

36. The design of the scheme was developed to be as accessible as possible; level access was considered imperative between the reception, banqueting hall, kitchen and toilet facilities. Each of these main functions also relate well to the associated external spaces, helping to integrate the building into the landscape in terms of function. As a result only a very small percentage of the building functions are located on the first floor.
37. The design of the scheme responds to the local pitched roof vernacular when approaching the building from the entrance and the highway. The use of natural cladding materials is an entirely appropriate response. The use of both natural slate is a higher quality material than the immediate surrounds of clay and concrete tiling. The main walling material of slate shingles and timber boarding is an appropriate high-quality response to the setting.

38. The ground floor plan below shows the clear processional entrance from the external boulevard into an initial lobby and reception with toilet and cloakroom functions; as guests progress to the west, the space opens out into a reception space with south and western views over the secret garden space. From here, at the appropriate time, guests move north into the banqueting hall. All the service functions are kept to the east, with well-connected circulation to ensure the guests and staff do not need to cross.

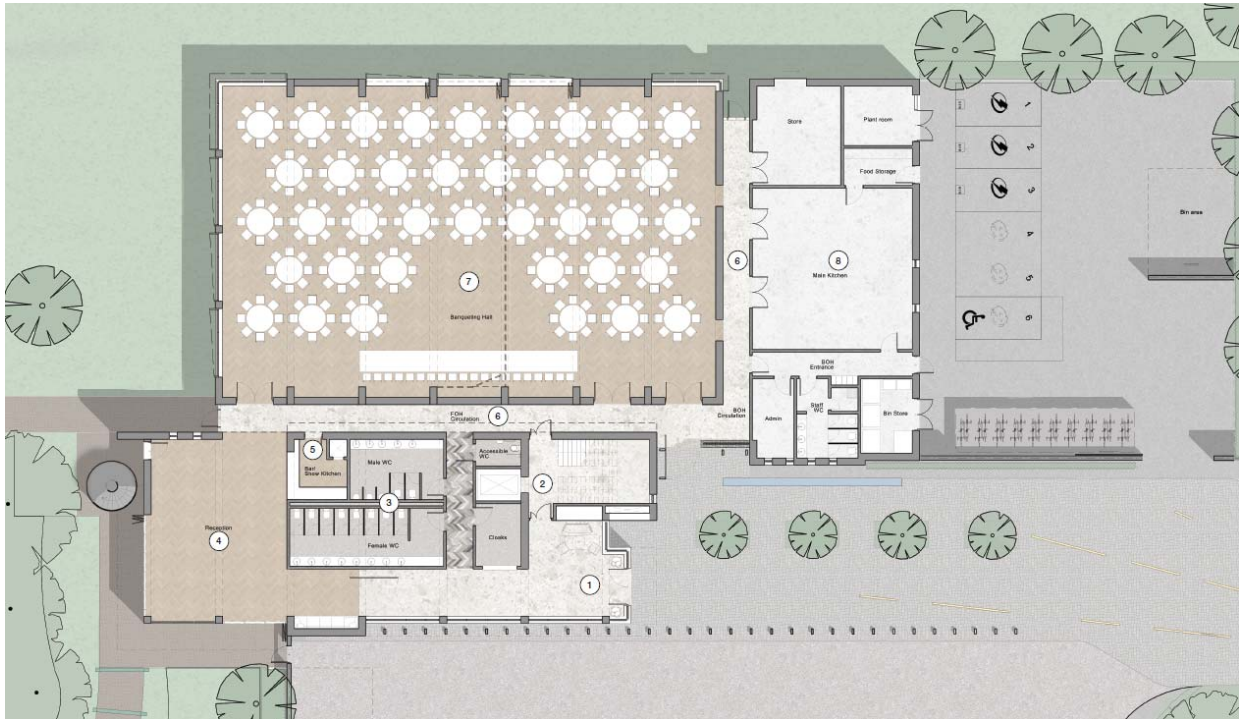


Fig 08 – Extract from Page 35 of the Design and Access Statement (CD 48-51)

39. The first-floor plan shown below sets out the remainder of the accommodation; the floor contains several meeting rooms for administration, and a small function room which may be used for taster menu events, and for VIP reception guests. There is also a bridal suite to allow the wedding party to prepare before the event.

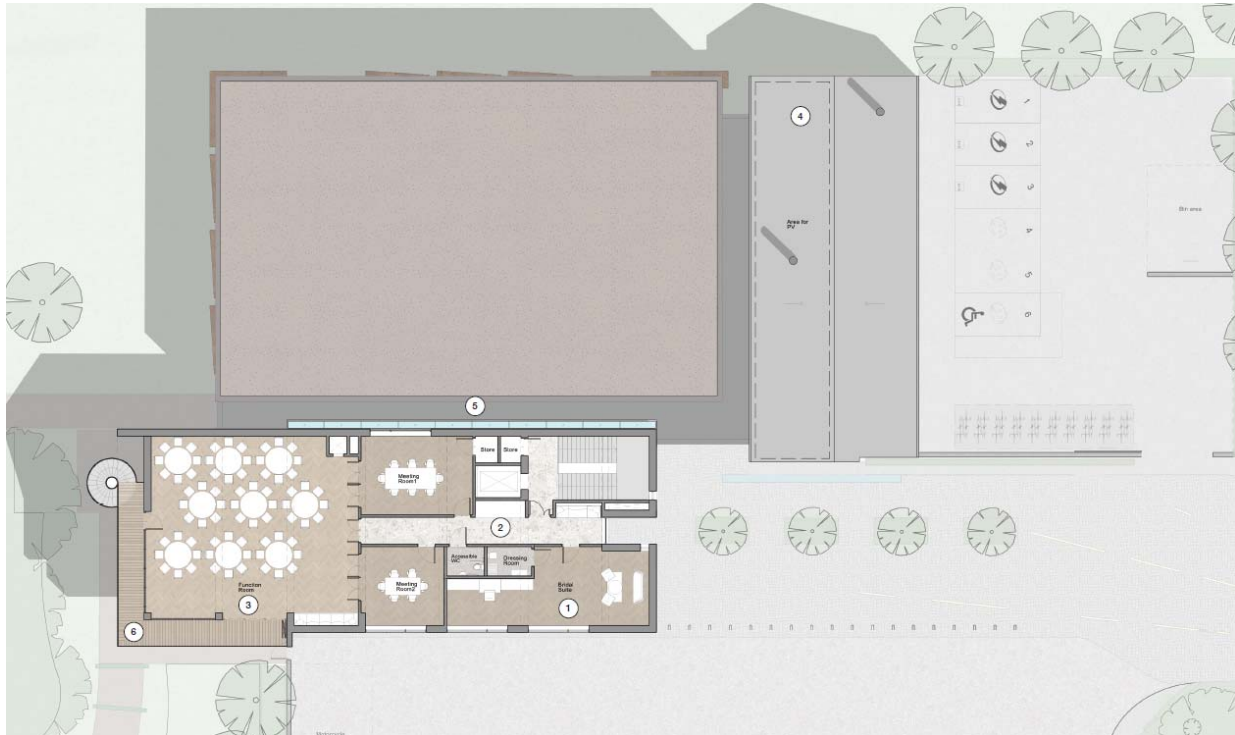


Fig 09 – Extract from Page 35 of the Design and Access Statement (CD 48-51)

40. The new building is located approximately in the location of the existing steel frame on site. Given the gentle slope of the site, a level rear lawn area is created by a slight cut into the existing landscape; this allows for the area to appear slightly sunken and banded to visually contain the area.



Fig 10 – Extract from Page 35 of the Design and Access Statement (CD 48-51)

41. The visual below shows the reception area to the south-west corner of the building, and the excellent connection with the landscape.



Figure 11 – Artists Impression of the Appeal Site Application (prior to final agreed design amendments)

What was the council's Design Officer's view of the scheme?

42. In April 2021, we received helpful comments from the Principal Urban Design Officer at the London Borough of Harrow. The following positive comments are extracted from his 'Summarised Design Commentary'
- i. *"Public Realm & Landscaping"*
The fan element to the pedestrian entrance is considered highly successful in signifying an arrival point to the venue for guests. The secret garden and swale elements maximise the southern aspect of the site and SUDS swale/pond and create more intimate and sheltered spaces for guests through planting and landscaping. The revisions to the pagoda path and re-siting of secret garden are positive and successful.

ii. External Appearance, Composition & Materiality

Generally, the siting of slate shingles to arrival elevations (south-east and north-east) and timber to garden/ banqueting elevations (north-west and south-west) is appropriate and serves to create a distinction in the external form of the building itself.

Accent cladding material is considered successful (Bay Study 3, DAS) and could be extended to other external feature element, with potential to replace the perforated patterned mesh elements.

Generally, the material palette is successful, however there is concern that the woven metal mesh element dilutes the palette and that a reduced palette may be better suited to the proposal. The hammered metal cladding could replace mesh elements and still retain the celebration inherent in the design and the Applicant may wish to explore a reduced palette.

43. Further constructive comments were also made and as a result agreed amendments were made to the scheme. In particular, the architecture of the gable end to the west of the building was reinforced and strengthened by disconnecting the projecting balcony. The image below left shows the original and, on the right, the revised.

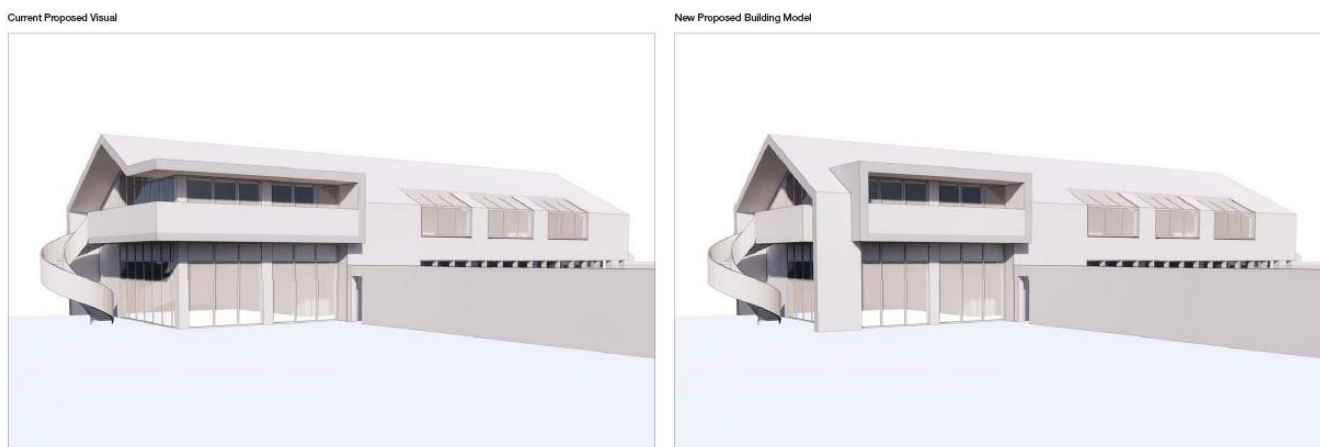


Figure 12 – Artists Impression of the Appeal Site Application

44. In response to both the request to simplify the palette of materials, and re-consider the laser cut panelling, a modified palette of materials was submitted. This omitted the laser panels. The woven mesh is particularly significant as a representation of the ornate and decorative fabrics particular to Asian weddings and is entirely appropriate. The balance of woven mesh to hammered metal was considered by the officer sufficiently minor to be dealt with by planning condition. The revised submitted palette is shown on the right below.



Figure 13 – Original (left) and Updated (right) Material palette removing the laser cut panels.

45. In conclusion, the bespoke design of the wedding venue on this site constitutes an exemplary, wholly appropriate and sustainable design response for the site. The approach was generally supported by the Local Authority, and we worked successfully with the Urban Design officers to reach a point when the design itself was acceptable subject to conditions. The below extract is taken from paragraph 6.3.21 of the Planning Officers report to committee.

“The approach to siting and layout of the building is supported and in general is well considered. The overall scale and massing of the building when considered in isolation to Green Belt issues is also generally considered to be acceptable. The applicant has sought to provide a material finish which respond to its semi-rural green belt setting and in general this is considered to appropriate, although, the material pallet could be further refined and improved as discussed above. Additionally, further amendments to the design as highlighted would improve its overall appearance which could be secured by planning condition, had the proposal been considered acceptable in other regards.”

46. It is evident that the scheme design has undertaken an exemplary process, resulting in an entirely appropriate design, and that this was supported by the Urban Design Officer.

What is the spatial impact of the Appeal scheme?

47. Given that the physical dimensions of the scheme are key to the assessment of openness presented in Mr Hughes evidence, I have set out below the spatial aspects of the submitted scheme.
48. From the very first pre-application submission, I have presented the spatial metrics of the proposals; these were openly discussed with LBH and amended and adjusted through mutual discussions.

49. The metrics at each stage are shown in the table below:

	Pre-App 1	Pre-App 2	Pre-App 3	DRP	Application
Footprint (sq.m)	1,406	1,193	1,193	1,193	1,108
Floorspace (sq.m.)	1,688	1,473	1,383	1,383	1,458
Volume (cub.m)	7,250	6,126	-	6,300	6,300
Height (m)	8.3	8.3	8.6	8.93	8.93

Existing Golf Club house	
Footprint	850sqm
Floorspace	1,308sqm
Volume	4859m ³
Maximum height	9.0m

	Existing Golf Club house	Proposed Wedding Venue	Increase (%)
Footprint	850 sqm	1,108 sqm	30%
Floorspace	1,308 sqm	1,458 sqm	11%
Volume	4,859 cubm	6,300 cub.m	30%
1. Roof Datum level	106.450	106.055	0.4m Reduction
2. Existing Eaves / Banqueting	103.520	103.100	0.42m Reduction
3. Existing Lower Ridge / Eaves	102.390	102.675	0.28m Increase
4. Existing Lower Eaves / Eaves	100.670	100.600	0.07m Reduction

Figure 14 – Extract from Design and Access Statement Page 41

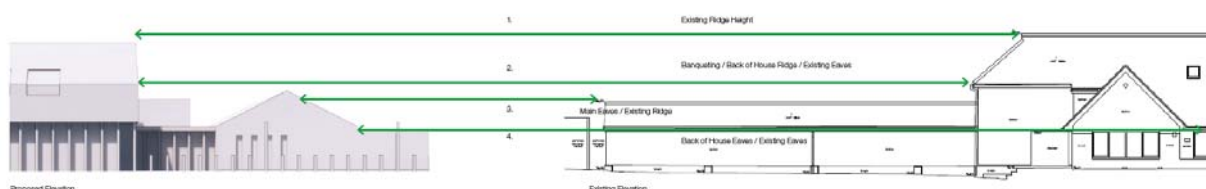


Figure 15 – Extract from Design and Access Statement Page 41

50. As set out above I have always documented the relationship of the proposed development to the former building on site. At the end of June 2020, the former building on site suffered a fire. This has affected the metrics discussed above as follows:

- i. **Footprint:** The footprint of the building is still clearly visible on the site. The proposals were also always clearly related to the area of Previously Developed Land (PDL). The location of the proposals being sited on PDL is not contested by either party.
- ii. **Floorspace:** Clearly all internal floorspace no longer exists post fire.

- iii. **Volume:** Although a physical volume of internal trapped air is no longer available, the spatial volume is unchanged. The observation of the volume of the building is still available on site, particularly when moving through the site.
 - iv. **Height:** The remains unchanged. The steel frame is still in place, and the maximum height of the structure only marginally decreased with the loss of roofing fabric. The proposed development remains below the height of the existing structure on site.
51. For an assessment of the impact of the scheme on openness, please refer to the evidence given by Mr Hughes.

Section 06 - Addressing the Reasons for Refusal

52. I have reviewed the Reasons for Refusal (RfR) and the Main Issues raised by the Inspector. Main Issue Two 'Character and Appearance' relates to design matters and is directly relevant to RfR2.

Reasons for Refusal Two

53. RfR2 relates to the design of the building. There is no commentary on this reason for refusal within the body of the Committee Report as this was added during the Planning Committee meeting, and indeed it appears to be in direct contradiction to the officer's recommendations. The RfR requires three questions to be posed:
- i. Is the design and form unsympathetic and obtrusive?
 - ii. Is the design and form to the detriment of the character and appearance of the locality?
 - iii. Is the Development contrary to the Policies highlighted in terms of character and appearance?
54. I will take each of these matters in turn.

Is the design and form unsympathetic and obtrusive?

55. As set out in Section 5 above, the Appeal scheme has been well considered in terms of the local and wider context. The design has been carefully considered in terms of the siting, massing, function and elevational treatment.
56. The RfR suggests that the design and form would appear to be unsympathetic and obtrusive in an open setting. In my professional opinion this could not be further from the truth.
57. To be unsympathetic is to be not in agreement or not supporting of the open setting; there is no open setting. There is an existing collection of walls and severely fire-damaged steel structure, along with localised trees and vegetation. In the context of the existing site, and the context of the surrounding local context, the design and form is not unsympathetic. The following key points set out why the design and form is not unsympathetic.
- i. **Not an open setting** – the new building replaces an existing severely fire-damaged steel frame and collection of single-storey walls. The proposals will in fact remove the current unsympathetic severely fire-damaged steel frame and replace it with a very suitable and contextual alternative.
 - ii. **Massing** – the new building is a collection of smaller buildings, generally single storey, with the entrance building of 2 stories. In no way is this unsympathetic to the local built setting in terms of the existing frame, and any local development.

- iii. **Form** – the new building takes on forms which are in no way alien to this area of Brockley Hill and the wider Harrow Weald Ridge Area of Special Character. This will be explored further in the next section.

58. Similarly, I have reviewed whether the design and form is obtrusive. I have reviewed the wire frame modelling provided in the evidence of Mr Hughes, and from an architectural form point of view, I consider the design and form is not obstructive. Mr Hughes comments further on the landscape impact in his evidence.

Is the Development to the detriment of the character and appearance of the locality?

59. The report presented to Committee contains a section on the Character and Appearance of the area. Various sections show there is common ground with regard to the form and location of the development. In paragraph 6.3.5 the report sets out as follows:

“Setting aside the issue of Green Belt openness, it is considered that the overall compact design and barn typology is considered to be acceptable. The height and overall scale of the building which is focussed on a previously developed part of the site is considered to be comfortable and appropriate. “

60. In order to assess this development, it is necessary to understand the character of this area. The area forms part of an assessment already undertaken by the Local Authority and this is a good starting point. It is agreed that the Appeal Site falls within the Harrow Weald Ridge Area of Special Character. This is noted as a local landscape/townscape designation in the Harrow Weald Conservation Areas SPD.

61. The most useful reference to this special character area is found in the “Character Assessment of Harrow’s Residential Area”. The area is referred to as extract below:

Extract from ‘Character Assessment of Harrow’s Residential Area

Harrow Weald Ridge

Harrow Weald Ridge forms the most substantial area of high land in Harrow, located across the north and north-east corner of the Borough, and is part of a larger area that extends north into the Hertfordshire district of Hertsmere. The ridge has two peaks of 160m above sea level in the region of Warren Lane, Stanmore, and at Harrow Weald Common, Old Redding.

The Ridge and its lower slopes are predominantly open land and constitute a major part of Harrow’s Green Belt. Agricultural occupiers of the Ridge and surrounds include Copse Farm, Oxhey Lane Farm, Wood Farm, Brockleyhill Farm and Grove Farm. There are also large areas of public open space at Bentley Priory, Stanmore Country Park, Stanmore Common and Harrow Weald Common, as well as the Roger Bannister sports ground, two golf courses (Grimsdyke and Brockley Hill) and a historic country hotel (Grimsyke Hotel). The Green Belt area includes ribbon development along Brookshill, Clamp Hill,

Stanmore Hill and Dennis Lane; pockets of more spacious, residential development also exist in the former grounds of Bentley Priory and Stanmore Hill. The lower slopes of the Ridge, beyond the Green Belt area, are occupied by an expanse of residential development north of Uxbridge Road and by Stanmore district centre.

Picture 4.3 Harrow Weald Ridge

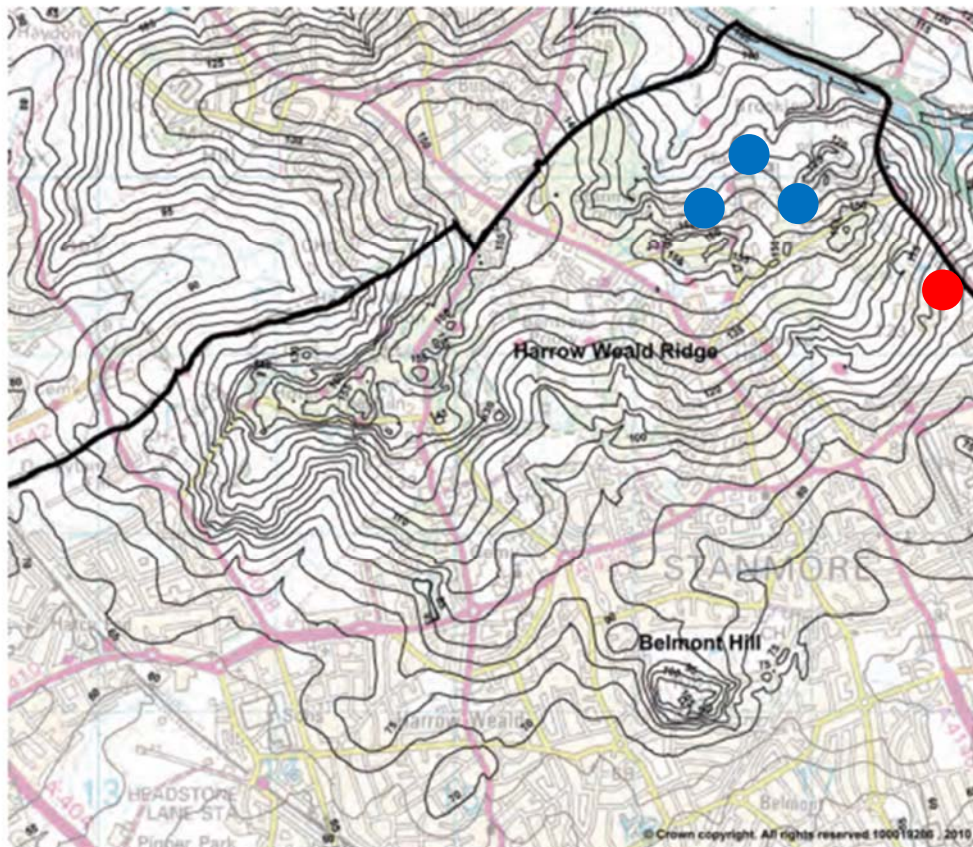


Figure 16 – Extract from 'Character Assessment of Harrow's Residential Area' Page 25

Red dot indicates Appeal Site. Blue dots indicate other development in the Harrow Weald Ridge Area of Special Character

62. The Appeal site is shown within this area by the red dot in the figure above. For the full spatial definition of the Harrow Weald Ridge Area of Special Character, please see Figure 3 within the evidence of Mr Hughes.
63. The character assessment acknowledges areas of open land and makes reference to a multitude of built development including agricultural facilities, farms, sports grounds, a country hotel and on the lower slopes an expanse of residential development.



Figure 17 – Grimsyke Hotel to the left and Roger Banister Sports Ground to the right



Figure 18 – Grimsyke Golf Club

64. The above images show development within the Special Character Area directly referred to in the text from London Borough of Harrow. There is a collection of different styles of development, mostly with pitched and gabled roofs and elevations, up to three stories, some elements of flat roofs, particularly when single storey, and some combinations of two storey pitched roofs adjacent single storey structures.
65. In addition, there is significant development within the character area not directly referred to in the above description and indicated by the blue dots on the map at figure 16. This development is directly to the north of the Appeal site as an aerial view from Google Maps shown in the figure below.
66. Clearly, there are numerous examples of multi-storey development within the Harrow Weald Ridge Area of Special Character.



Figure 19 – Development around the Royal National Orthopaedic Hospital within the Harrow Weald Ridge Area of Special Character.

67. The submitted Design and Access Statement put forward the following conclusion on page 22 **(CD 48-51)** as figure 04 above:

A review of the local vernacular has been undertaken to establish the most appropriate form for the building. As can be seen, there is a prevalence of pitched roofs and gable ends.

This vernacular is not dissimilar to the existing building on site shown earlier. In terms of materiality there is a large existing palette of materials used, ranging from brick and slate / tile to render, stone and timber cladding.

68. I remain of the view, in the absence of any other documentation or guidance from London Borough of Harrow, that the context and vernacular review we undertook was appropriate, and that the vernacular put forward for the Appeal site constitutes a wholly appropriate and suitable design response to the character and appearance of this Area of Special Character and is in no way a detriment.
69. In reality, there are very few vantage points from which the design and form can be viewed. As set out in the evidence from Mr Hughes, the proposed development is not visible from any locations outside of the site except for the site entrance. Therefore, save for the entrance view, all other views are internal to the site.
70. This opinion is also borne by the London Borough of Harrow, as set out in the Planning Report to Committee **(CD 71)** Paragraph 6.14

There would be no alteration in relation to the existing vegetation around the site and therefore Officers accept that the proposed replacement building would not be visible from these vantage points from the identified long and medium distance views outside the site even in relation to the existing site conditions.



Figure 20 – Photo on the Left before the fire and on the right after the fire.

71. The impact of the view from the entrance is set out in the evidence of Mr Hughes.
72. Figure 21 below shows the local context and shows how the development sits within this sloping site, and the figures on the following page show the general nature of the site.

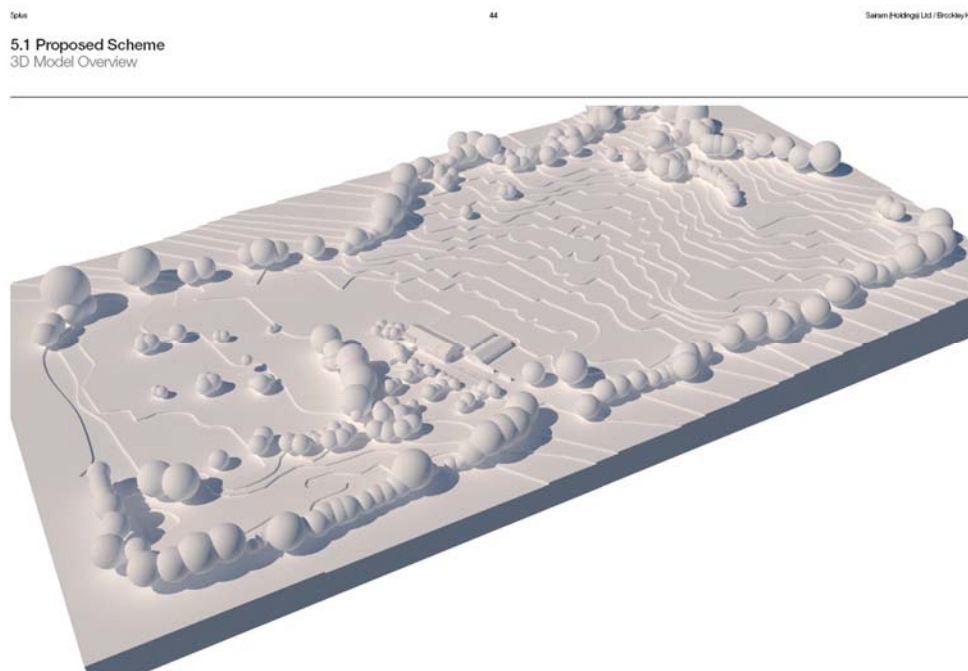


Figure 21 – Extract from DAS page 44 showing the development within its context

73. Given the site is previously developed, and incorporates the clear references to the local vernacular, in my opinion, the design and form is not to the detriment of the character and appearance of the locality.

Section 07 - Planning Policy and Guidance

Is the Development contrary to the Policies highlighted in terms of character and appearance?

74. I have reviewed both the specific policies set out in RfR2, and other relevant policies. I will briefly set out my opinion regarding each with regard to character and appearance.

NPPF 2021

75. I have reviewed the policies in the NPPF relevant to character and appearance as follows:

- i. *Paragraph 126 of the NPPF states: The creation of high quality, beautiful and sustainable 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. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities and other interests throughout the process.*

76. The proposals have followed an exemplary design process, starting with excellent engagement with the Local Authority, and Design Reviews with both the Local Authority and the GLA. The GLA commented on how well the engagement process had worked. Similar there has been positive engagement with the Asian community that will use the venue and opportunities for local residents and councillors to input.

77. The result is a design which meets all the requirements of the brief in a clear and intuitive way. This building is one that most people will only experience once. A clear intuitive approach to the building, and an understanding of where the entrance can be found is necessary and provided. This building will create a positive and sustainable environment on the site compared to the existing severely fire-damaged steel frame.

78. Without doubt, the proposals are of high quality, utilising high quality materials. The sustainability targets have been discussed, and a BREEAM Excellent building is proposed.

- i. *Paragraph 130 of the NPPF 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; and (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.*

79. I have dealt with all of these elements elsewhere in this evidence. The functionality of the building is discussed in Section 5 in the review of the plans and layouts. The building functions well. The design is

visually attractive as shown in the 3D visualisations, and also integrates well with the external spaces as shown in figure 07. The design and form are sympathetic to the setting as set out in paragraphs 53 – 56.

- i. *Paragraph 134 of the NPPF states that development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes. Conversely, significant weight should be given to: a) development which reflects local design policies and government guidance on design, taking into account any local design guidance and supplementary planning documents such as design guides and codes; and /or b) outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.*

80. The character and appearance of the proposals do reflect the locality in terms of context and the Harrow Weald Ridge Area of Special Character. In my opinion the proposed scheme wholly supports and accords with the design objectives in the Framework

81. RfR2 sets out that the character and appearance is contrary to the following policies:

- i. Policy D1 London Plan
- ii. Policy G2 of the London Plan (2021)
- iii. Core Policy CS 1 B of the Harrow Core Strategy (2012)
- iv. Policy DM 1 of the Harrow Development Management Policy Local Plan (2013)

Policy D1 London Plan

82. The Council no longer contends that this policy is relevant (para. 5.17 of its statement of case).

Policy G2 of the London Plan (2021)

83. This policy does not directly address design matters, and is not applicable to the second reason for refusal. The appeal scheme's performance against Policy G2 is considered in the evidence of Mr Henley.

Core Policy CS 1 B of the Harrow Core Strategy (2012)

84. This policy relates to Local Character. There are references to garden development, and extensions / host buildings which are not relevant. However, in terms of specific references, the policy requires the following paraphrased below:

“Proposals that would harm the character of suburban areas... will be resisted. All development shall respond positively to the local... context in terms of design, siting, density and spacing”

85. As discussed above, I am of the opinion that the design is very suitable for its context and is sited in the location of a former building, and a high quality replacement for the unsightly fire-damaged building. The policy continues:

“All development shall... reinforce the positive attributes of local distinctiveness whilst promoting innovative design”

86. As discussed above, the design of the proposals responds very positively to the local vernacular, both in terms of form and the arrangement as a collection of smaller buildings. The decorative foils and panels that line the edges of the entrances provide for innovative use of materials. This view is shared by the Council and reinforced in the committee report in paragraph 6.3.18

“The use of bronze inlays for reveals has potential to be highly successful and contrast well with the dark matt materials of the blackened timber and black metal sheeting. There is potential to deliver the concept of a jewel box and add a truly celebratory quality through this type of material juxtaposition”

87. I therefore conclude that the design of the building is in compliance with this policy. For more details on the landscape character please refer to the evidence of Mr Hughes.

Policy DM 1 of the Harrow Development Management Policy Local Plan (2013)

88. This policy relates to achieving a high standard of development, and is broken down into a number of sections as follows:

A. Design and Layout Considerations

All development and change of use proposals must achieve a high standard of design and layout. Proposals which fail to achieve a high standard of design and layout, or which are detrimental to local character and appearance, will be resisted.

B. The assessment of the design and layout of proposals will have regard to:

a. the massing, bulk, scale and height of proposed buildings in relation to the location, the surroundings and any impact on neighbouring occupiers;

b. the appearance of proposed buildings, including but not limited to architectural inspiration, detailing, roof form, materials and colour, entrances, windows and the discreet accommodation of external services;

c. the context provided by neighbouring buildings and the local character and pattern of development;

d. the provision of appropriate space around buildings for setting and landscaping, as a resource for occupiers and to secure privacy and amenity;

e. the need to retain or enhance existing landscaping, trees, biodiversity or other natural features of merit;

f. the functionality of the development including but not limited to the convenience and safety of internal circulation, parking and servicing (without dominating the appearance of the development) and the appearance, capacity, convenience, logistics and potential nuisance of arrangements for waste, recycling and composting; and

g. the arrangements for safe, sustainable and inclusive access and movement to and within the site.

89. I will deal with each of the relevant sections in turn:
90. Section A relates directly to resisting designs which are to the detriment of the local character and appearance. This relates directly to the evidence and RfR2. It is my opinion that the scheme is of a high standard of design and layout and is not of detriment to the local character and appearance.
91. Section B relates to having regard to several factors, including bulk, scale and massing, context, space around the buildings, biodiversity, and access and movement.
92. Section B, (a-c). The bulk, scale and height of the proposed building in relation to the location. This building is not tall in comparison to the locality, surrounding buildings or existing structures on site. The residential neighbours to the south of the scheme are a relatively long way away as to not be impacted. All these aspects are examined thoroughly in the previous section, and the scheme is in compliance.
93. Section B. (d). The building sets out in detail the external spaces around the building and how these spaces are used positively to connect with the building. This is set out clearly in figure 07.
94. Section B. (e). Please refer to the evidence provided by Mr Hughes.
95. Section B. (f - g). The Design and Access Statement sets out the safe, sustainable and inclusive access and movement to and within the site. Internal and external circulation is clearly defined in the submitted plans. Pedestrian safety and good pedestrian connection to Brockley Hill has been integrated into the design. Car parking capacity and layout has been extensively reviewed in the evidence of Mr Bird. Waste and Recycling locations have been identified.
96. Policy DM1 continues further with sections C, D and E.

97. Section C requires a high standard of privacy and amenity. This is evident in the layout. The landscape surrounding the building has been considered from the outset,
98. Section D requires a review of privacy. In all cases, where relevant, we comply.
99. Section E is not applicable as other parts of the site are not allocated for development.
100. I therefore conclude that the design is in full compliance with this policy.

Additional development plan policies and material considerations introduced by the Council not cited on the decision notice

101. The Council have introduced the following policies as part of their Statement of Case.
- i. Policy D3 London Plan, specifically D(1), (11) and (12)
 - ii. Policy CS 7A of the Core Strategy and
 - iii. Policy DM 6 of the Harrow Development Management Policies Local Plan.

London Plan Policy D3 D(1), (11) and (12) (Optimising site capacity through a design led approach)

102. The context of this policy is to make sure that all development makes the best use of land by following a design-led approach that optimises the capacity of sites. This approach requires consideration of design options to determine the most appropriate form of development that responds to a site's context and capacity for growth.
103. In the case of this appeal site, given that the site has been previously developed, and has the appropriate infrastructure in terms of both access and utilities, I strongly contend that the re-use of this site is the correct and sustainable approach.
104. The policy itself is broken down into a number of sections as follows:

Form and layout

D3 D (1) enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape, with due regard to existing and emerging street hierarchy, building types, forms and proportions

105. The site is currently occupied by the fire damaged shell and frame of a former golf club building. Further, this derelict structure has become the target of graffiti, and is now surrounded by fly tipping. It is my strong opinion that the proposed scheme to be a significant improvement and enhancement to the local context.

106. As set out in the evidence above in Section 6, the scheme responds positively to the local distinctiveness. In addition to the evidence above, this policy includes consideration of orientation. The orientation of each building has been carefully considered. In terms of direct sunlight, the entrance sequence is located to the south of the building with a series of vertical fins within the façade. This will provide a playful casting of shadow across the entrance route and bring a sense of joy. The reception space is located purposefully in the south-west corner of the building to benefit from the afternoon sun. Importantly from an energy perspective the largest cooling requirement of the building will be the banqueting suite. This has purposefully been located to the north to ensure minimal solar gain. The orientation of this collection of buildings has therefore been well optimised.
107. Since the proposals are located on the site of the existing building, I can confirm that they do have due regard to the existing street hierarchy.

Quality and character

D3 D (11) respond to the existing character of a place by identifying the special and valued features and characteristics that are unique to the locality and respect, enhance and utilise the heritage assets and architectural features that contribute towards the local character

108. This is reviewed in the evidence of Mr Hughes

D3 D (12) be of high quality, with architecture that pays attention to detail, and gives thorough consideration to the practicality of use, flexibility, safety and building lifespan through appropriate construction methods and the use of attractive, robust materials which weather and mature well

- i. **High Quality** – the scheme is constructed of high-quality external materials, and is, in my professional opinion of a high-quality design.
- ii. **Attention to detail** – Every aspect of the scheme has been considered. By breaking down the function of the building based on the people that use it, every aspect of the day to day functions have been considered. Practical functions are dealt with in the following paragraph, but in terms of design details numerous examples can be cited. The successful fan arrangement in the paving at the entrance, the bollards to the pavement to allow guests to reach the entrance walkway, the privacy window from the first floor bridal suite, the green wall, the exit doors from the banqueting hall direct to the car park.
- iii. **Practicality of use** – The scheme proposals benefit from being split into 3 functional buildings; this allows for very practical use of the building. During early food preparation only one of the three buildings will be required. Similarly, the front of house building can be used in isolation when management functions occur, or when clients are visiting to discuss arrangements. A small function space has been provided within the Front of House building to accommodate reduced functions which would not need the larger spaces.

- iv. **Flexibility** – The banqueting hall has been arranged to allow flexibility with a demountable partition splitting the space into two un-equal elements. This divide is purposefully off centre to increase flexibility and allow for 3 different hall sizes to be provided.
- v. **Safety** – We have undertaken consultation in January 2021 with Danny McHail the local Designing Out Crime Officer (DOCO) to ensure that safety and reduction of crime is considered. The new building will obviously vastly improve the current situation on site with regard to safety. In terms of Fire Safety a Fire Statement was submitted with the application.
- vi. **Building Lifespan** – A Life Cycle Assessment was produced in January 2021 and submitted with the application. This considered the use of steel verses concrete frames and other similar design decisions and assessed the building over a 60-year study period.

109. I therefore conclude that the design is not just in compliance with this policy, but goes beyond in every area cited.

Core Strategy Policy CS 7A (Stanmore and Harrow Weald Ridge)

A. Development will be managed to maintain the special character and identified views of Harrow Weald Ridge.

110. This is reviewed in the evidence of Mr Hughes

Harrow Development Management Policies Local Plan: Policy DM 6 (Areas of Special Character)

A. Proposals affecting an area of special character will be considered having regard to:

- a. the impact of the proposal upon the strategic value of the area of special character;*
- b. the desirability of preserving or enhancing the environmental, architectural, historic and landscape features that contribute to the area of special character;*
- c. the protected views to and from areas of special character.*

C. Proposals that would substantially harm an area of special character, or its setting, will be refused.

111. In my opinion the architectural form, design and quality of the proposed banqueting facility, would not cause substantial harm to the area of special character and be a highly appropriate and sensitive replacement for the existing unsightly fire damaged building.

Section 08 - Conclusion

112. I have been personally involved in the design of this scheme from the outset. I have attended all pre-application meetings with the Local Authority, all design reviews and all public / councillor consultation events and have taken on board all relevant feedback.
113. The proposals for this site are of the highest architectural quality. Well-designed places and buildings come about when there is a clearly expressed 'story' for the design concept and how it has evolved into a design proposal. This has been the case here. From the initial briefing to the final resolution of the built form, there is a compelling story and rationale which has helped to carve the final design presented in this appeal.
114. I have set out the evolution of the design, and the iterative process undertaken along the way. The building is better for this process. The design has been supported by a wider design team to ensure that the architectural design has not occurred in isolation.
115. The result is a high-quality architectural design which is appropriate to the local context. In terms of massing, form and materials the application constitutes a wholly appropriate and sustainable design response to policy and guidance for the site.
116. I have reviewed Reason for Refusal 2, with regard to character and appearance. In my professional opinion, the proposed building would not appear as unsympathetic and obtrusive in an open setting. The proposed building would not be to the detriment of the character and appearance of the locality.
117. I have also reviewed both the policy references in the reason for refusal and other relevant policies, and in my professional opinion, I consider that the architectural design aspects of these proposals are in accordance with these policies.
118. I recommend that the appeal for this site is upheld.

Section 09 – Summary of Evidence

120. I, Adam Thornton, am a Founding Director of 5plus Architects. I am a member of the RIBA, a Lecturer at London Metropolitan University and an External Examiner of Professional Practice at both The University of Nottingham and London Metropolitan University.

The Brief

From the outset the brief was to provide a high-quality design for a new Asian wedding / banqueting facility to replace the client's existing facility on Canning Road in Harrow. The vision for the site had been clearly set from the outset as a wedding venue to replicate and improve on the existing space; for example, both the kitchen spaces and toilet facilities were considered too small in the existing facility. At the centre of the proposal is the cultural offer which is unique in Harrow, and was captured in the early document.

Evolution of the Scheme

121. This site gave the opportunity to design a bespoke wedding venue based on the exact needs of the users of the building, whilst at the same time being carefully considered to be sited in the context of this previously developed Green Belt site.
122. At the heart of the design was the recognition that the venue would be used and experienced in different ways depending on your relationship to the wedding. These categories were broken down into:
- i. The wedding party / bride and groom
 - ii. Wedding guests
 - iii. The supporting staff for the event
 - iv. Day to day management and Deliveries.
123. In order to ensure the external design was appropriate to the local character and appearance, a contextual study was undertaken. The summary of this study is shown below. The local area consists primarily of two-storey buildings, with a regular occurrence of gable ends facing the highway. Roof pitches vary from 30 degrees to 60 degrees.
124. The design was conceived as a series of buildings, each taking on a distinct function; Front of House, Back of House, Banqueting space. This allows for the forms to be treated as a series of outbuildings in keeping with this previously developed site.
125. A robust pre-application process was undertaken with the Local Authority which demonstrates the applicant's willingness to have an open and robust discussion about the design and to develop the design of the scheme to the satisfaction of the Local Authority.

126. The scheme was reviewed by the Local Authority's Design Review Panel on 25 June 2020. Feedback received 10 July 2020 records that the building design was successful in reducing visual presence on the surrounding context but urged the Applicant to review the ceremonial procession through the building.
127. The scheme was reviewed by the GLA Design Review Panel on 29 July 2020. Feedback received 27 August 2020 records that the proposal has clearly benefitted from engagement with the Borough's pre-application process and Design Review Panel. In terms of architectural quality, the feedback confirms that the simple approach to building forms and the aspiration to achieve BREEAM Excellent are welcomed.

The Proposed Appeal Scheme

128. The architectural design of the Appeal scheme is set out in detail in both the submitted Design and Access Statement (**CD 48-51**) and the accompanying drawings (**CD 21-39**).
129. As set out in Paragraph 16 of the National Design Guide, well-designed places and buildings come about when there is a clearly expressed 'story' for the design concept and how it has evolved into a design proposal. In my opinion the Design and Access statement (**CD 48-51**) clearly sets out this story, helping to reinforce this exemplary design. I have outlined key aspects of this narrative below.
130. The initial impression given as you enter the site from Brockley Hill is captured in the visual below; the venue presents itself as a collection of buildings, breaking down the mass to be appropriate to the locality. The use of the dominant two storey gable end facing the highway clearly indicates the entrance. This is important for a venue such as this that is mainly visited by guests for the first time. A clear entrance sequence is very important to help intuitive wayfinding and reduce the need for signage.



Figure 06 – Artists Impression of the Appeal Site Application

131. The three functions, Front of House, Back of House and the Banqueting space each have an excellent relationship with the external space, and therefore an immediate connection to the landscape and views, demonstrated in the diagram below. The Front of house and Banqueting buildings benefit from the western late afternoon and evening sun.

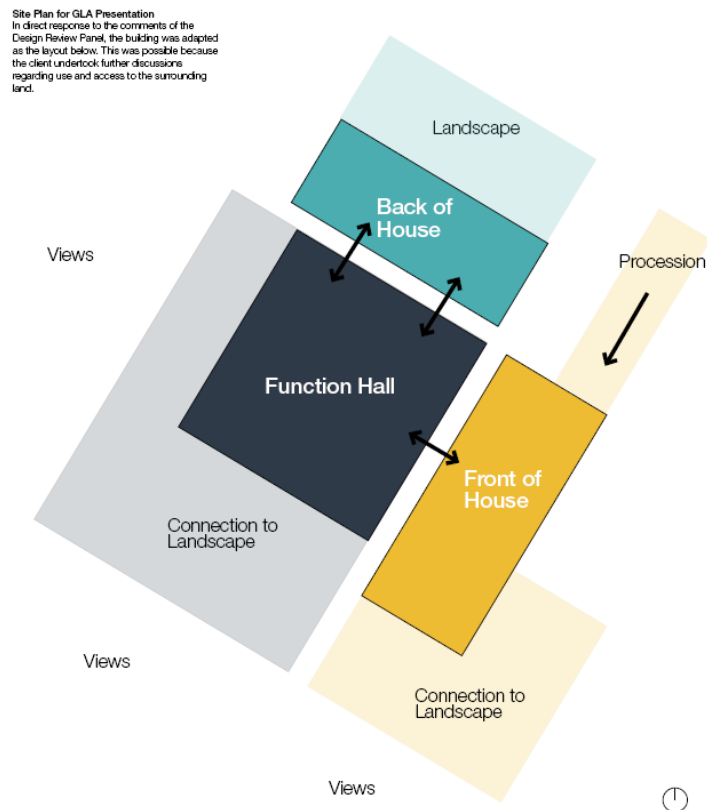


Fig 07 – Extract from Page 35 of the Design and Access Statement (CD 48-51)

132. The design of the scheme responds to the local pitched roof vernacular when approaching the building from the entrance and the highway. The use of natural cladding materials is an entirely appropriate response. The use of both natural slate is a higher quality material than the immediate surrounds of clay and concrete tiling. The main walling material of slate shingles and timber boarding is an appropriate high-quality response to the setting.
133. In conclusion, the bespoke design of the wedding venue on this site constitutes an exemplary, wholly appropriate and sustainable design response for the site. The approach was generally supported by the Local Authority, and we worked successfully with the Urban Design officers to reach a point when the design itself was acceptable subject to conditions. It is evident that the scheme design has undertaken an exemplary process, resulting in an entirely appropriate design, and that this was supported by the Urban Design Officer.

Addressing the Reasons for Refusal

134. I have reviewed the Reasons for Refusal (RfR) and the Main Issues raised by the Inspector. Main Issue Two 'Character and Appearance' relates to design matters and is directly relevant to RfR2.

Reasons for Refusal Two

135. RfR2 relates to the design of the building. There is no commentary on this reason for refusal within the body of the Committee Report as this was added during the Planning Committee meeting, and indeed it appears to be in direct contradiction to the officer's recommendations.

Is the design and form unsympathetic and obtrusive?

136. The RfR suggests that the design and form would appear to be unsympathetic and obtrusive in an open setting. In my professional opinion this could not be further from the truth.
137. To be unsympathetic is to be not in agreement or not supporting of the open setting; there is no open setting. There is an existing collection of walls and severely fire-damaged steel structure, along with localised trees and vegetation. In the context of the existing site, and the context of the surrounding local context, the design and form is not unsympathetic. Similarly, I have reviewed whether the design and form is obtrusive. I have reviewed the wire frame modelling provided in the evidence of Mr Hughes, and from an architectural form point of view, I consider the design and form is not obtrusive. Mr Hughes comments further on the landscape impact in his evidence.

Is the Development to the detriment of the character and appearance of the locality?

138. In order to assess this development, it is necessary to understand the character of this area. The area forms part of an assessment already undertaken by the Local Authority and this is a good starting point. It is agreed that the Appeal Site falls within the Harrow Weald Ridge Area of Special Character. This is noted as a local landscape/townscape designation in the Harrow Weald Conservation Areas SPD.
139. I remain of the view, in the absence of any other documentation or guidance from London Borough of Harrow, that the context and vernacular review we undertook was appropriate, and that the vernacular put forward for the Appeal site constitutes a wholly appropriate and suitable design response to the character and appearance of this Area of Special Character and is in no way a detriment.
140. The impact of the view from the entrance is set out in the evidence of Mr Hughes.
141. Given the site is previously developed, and incorporates the clear references to the local vernacular, in my opinion, the design and form is not to the detriment of the character and appearance of the locality.

Planning Policy and Guidance

NPPF 2021

142. I have reviewed the policies in the NPPF relevant to character and appearance and confirm we comply with paragraphs 126, 130 and 134.

143. I have reviewed the following policies:

- i. Core Policy CS 1 B of the Harrow Core Strategy (2012)
- ii. Policy DM 1 of the Harrow Development Management Policy Local Plan (2013)

Core Policy CS 1 B of the Harrow Core Strategy (2012)

144. This policy relates to Local Character. There are references to garden development, and extensions / host buildings which are not relevant. I conclude that the design of the building is in compliance with this policy. For more details on the landscape character please refer to the evidence of Mr Hughes.

Policy DM 1 of the Harrow Development Management Policy Local Plan (2013)

145. This policy relates to achieving a high standard of development. I conclude that the design is in full compliance with this policy.

Additional development plan policies and material considerations introduced by the Council not cited on the decision notice

146. The Council have introduced the following policies as part of their Statement of Case.

- i. Policy D3 London Plan, specifically D(1), (11) and (12)
- ii. Policy DM 6 of the Harrow Development Management Policies Local Plan.

London Plan Policy D3 D(1), (11) and (12) (Optimising site capacity through a design led approach)

147. The context of this policy is to make sure that all development makes the best use of land by following a design-led approach that optimises the capacity of sites. I conclude that the design is not just in compliance with this policy, but goes beyond in every area.

Harrow Development Management Policies Local Plan: Policy DM 6 (Areas of Special Character)

148. In my opinion the architectural form, design and quality of the proposed banqueting facility, would not cause substantial harm to the area of special character and be a highly appropriate and sensitive replacement for the existing unsightly fire damaged building.

Conclusion

149. The proposals for this site are of the highest architectural quality. Well-designed places and buildings come about when there is a clearly expressed 'story' for the design concept and how it has evolved into a design

proposal. This has been the case here. From the initial briefing to the final resolution of the built form, there is a compelling story and rationale which has helped to carve the final design presented in this appeal.

150. I have set out the evolution of the design, and the iterative process undertaken along the way. The building is better for this process. The design has been supported by a wider design team to ensure that the architectural design has not occurred in isolation. The result is a high-quality architectural design which is appropriate to the local context. In terms of massing, form and materials the application constitutes a wholly appropriate and sustainable design response to policy and guidance for the site.
151. I have reviewed Reason for Refusal 2, with regard to character and appearance. In my professional opinion, the proposed building would not appear as unsympathetic and obtrusive in an open setting. The proposed building would not be to the detriment of the character and appearance of the locality.
152. I have also reviewed both the policy references in the reason for refusal and other relevant policies, and in my professional opinion, I consider that the architectural design aspects of these proposals are in accordance with these policies.
153. I recommend that the appeal for this site is upheld.

Section 10 - Statement of Truth

The evidence which I have prepared and provide for this appeal reference APP/M5450/W/22/3299650 is true and I confirm that the opinions expressed are my true and professional opinions.



.....
Adam Thornton RIBA
Director
5plus Architects