

## **PROOF OF EVIDENCE - URBAN DESIGN**

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**APPEAL BY SAIRAM (HOLDINGS) Ltd**

**AGAINST A REFUSAL OF PLANNING PERMISSION AT**

**FORMER STANMORE AND EDGWARE GOLF CENTRE, BROCKLEY HILL, STANMORE, HA7 4LR**

**APPEAL REF: APP/M5450/W/22/3299650**

**LPA ref: P/3088/20**

**SEPTEMBER 2022**

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## 1. QUALIFICATIONS AND PROFESSIONAL BACKGROUND

- 1.1. My name is Fabrizio Matillana. I am a chartered architect registered at the Architect's Registration Board (ARB) since 2013.
- 1.2. I have been instructed by the London Borough of Harrow (LBH) as an independent urban design witness to give evidence in this appeal.
- 1.3. I have worked in private architectural practice since 2010 in London. In 2020 I joined the public sector as Principal Urban Designer in Enfield Council and since 2021 I work at Islington Council.
- 1.4. In my 10 years private architectural practice I have worked at AJ100 firms and for Royal Academician Farshid Moussavi OBE. In Enfield Council, I led the urban design advice for the borough's most high-profile schemes including Meridian Water Phase 1 and Edmonton Green Shopping Centre. I also worked on other major projects on Green Belt, brownfield, strategic industrial land, tall buildings, and mixed-use schemes. In Islington, I joined the New Build Team advising on the New Building Housing Programme, responsible for delivering new council housing via estate regeneration.
- 1.5. I am currently Deputy Team Leader of Design and Conservation at Islington Council. I am responsible for leading the design and conservation advice for major applications, managing a team of design and conservation officers, running the Design Review Panel and advise on design matters on policy and strategic projects.
- 1.6. Relevant to this appeal, I have experience working on projects on sensitive settings as architect in private practice and as urban designer in a Local Authority. This includes projects on Green Belt, Site of Nature Conservation Interest, Conservation Areas, and Grade II, II\* and I listed buildings.
- 1.7. I have represented Islington Council at appeal hearings on urban design matters as well as made written representations while in private architectural practice.

- 1.8. I have taught urban design at the Bartlett School of Planning in 2021 at Master's Level and I am, since 2021, Design Tutor at the London School of Architecture teaching in their Master's of Architecture in Designing Architecture program. I have also done lectures and attended student reviews at the Architectural Association School of Architecture, Bartlett School of Architecture, University of Greenwich, and University of Reading at undergraduate level.
- 1.9. I am also a Panel Member of Harrow's Design Review Panel since April 2021. I have reviewed the Poet's Corner development.
- 1.10. I have an AA Diploma from the Architectural Association School of Architecture (AA Dipl ARB/RIBA Part I and II), a Postgraduate Diploma in Professional Practice & Management in Architecture (PGDip ARB/RIBA Part III) from the Bartlett School of Architecture and a Master's in Science in Spatial Planning from the Bartlett School of Planning (MSc.).
- 1.11. The evidence which I have prepared and provide for this appeal reference APP/M5450/W/22/3299650 (in this proof of evidence) is true and has been prepared and is given in accordance with the guidance of my professional institution and I confirm that the opinions expressed are my true and professional opinions.

## 2. SCOPE OF MY PROOF OF EVIDENCE

- 2.1. This evidence is to present my views on the second reason for refusal (RFR 2).
- 2.2. RFR 2 states: *"The proposed building, by reason of its design and form, would appear as unsympathetic and obtrusive in an open setting, to the detriment of the character and appearance of the locality within the context of a Green Belt site, contrary to policy D1, G2 London Plan (2021), policy CS1.B of the Harrow Core Strategy (2012) and policy DM1 of the Development Management Policies (2013)."*
- 2.3. I agree with the stated reason for refusal.

### **3. DESCRIPTION OF THE SITE, ITS SURROUNDINGS AND RELEVANT DESIGNATION**

- 3.1. I undertook a site visit on 22nd of August 2022 accompanied by Case Officer Nicola Rankin and her manager Bettina Aneke.
- 3.2. The site is a former golf centre club house and driving range located to the west of Brockley Hill.
- 3.3. The overall site is 1.63 hectares, with a former golf course and open field to the north covering most of the plot. The former golf club house building with parking space and hardstanding are located to the south.
- 3.4. The current state of the site is unkept and overgrown. Following a fire that destroyed the club house building in June 2020, the residual structure has been left exposed and with a considerable amount of debris and litter building up.
- 3.5. There are still nets used by the golf club flanking the site. The parking space is unkept and overgrown.
- 3.6. From Brockley Hill to the east, which is the site entrance, the vegetation remains cleared, and the residual structure is visible from the road.
- 3.7. At the time of the site visit, the golf course was overgrown, acquiring a wilder character than when the site was a golf course in operation.
- 3.8. The site is within the Harrow Weald Ridge Area of Special Character (HWR AoSC) and Green Belt land. It is also a Site of Importance for Nature Conservation (SINC).
- 3.9. The site is characterised by open field with a tree line along its perimeter. Its east side is towards Brockley Hill A5 road. To the north, the site is adjacent to Pear Wood Nature Reserve, to the south; Cleopatra Close Park and to the east; Stanmore Country Park.

### **4. DESCRIPTION OF PROPOSAL**

- 4.1. The appellant's scheme is a Banqueting House which is replacing the former golf club house residual structure.

- 4.2. The site boundary line does not cover the full extent of the former golf course. The scheme is contained towards the south of the plot.
- 4.3. The building includes a series of three main spaces: function room, front and back of house facilities. The function room area includes the banqueting space which the appellant set at 550sqm. This is the main space of the Banqueting House.
- 4.4. At ground floor there is front of house and back of house facilities which include bar, kitchens, storage, cloakroom, reception, plant, and toilets.
- 4.5. On the first floor, there is a smaller function room, bridal suite, and meeting rooms.
- 4.6. The building's design concept, as stated in the DAS section 4.1, is the "un-quarried gemstone": this is based on the colourful nature of the events hosted with a natural and harmonious envelope, in reference to its setting.
- 4.7. The design team referred to the agricultural barn typology to develop this concept, as shown in its roof form, massing and material.
- 4.8. The appellant scheme also includes supporting car parking for guests and staff.
- 4.9. Around this new building, landscape is being proposed that offers routes around the Banqueting House. This includes meadows, tree lines, formal water feature and a pond.

## 5. POLICY & GUIDANCE REVIEW

- 5.1. This section will review the policies cited in RFR 2 and the Council's Statement of Case.
- 5.2. The London Plan's policy D1 'London's form, character, and capacity for growth' was referenced in the reasons for refusal. This is not a relevant policy for the purpose as it does not relate to building design and form. This is updated in the Council's Statement of Case.
- 5.3. Policy D3 'Optimising site capacity through the design-led approach' is the policy that should have been included and will be discussed.
- 5.4. Policy GG2 'Making the best use of land' refers states: *"To create successful sustainable mixed-use places that make the best use of land, those involved in planning and*

*development must: D) applying a design-led approach to determine the optimum*

*development capacity of sites.” This approach is explained in D3.*

5.5. London Plan’s policy D3 A) states that: *“All development must make the best use of land by following a design-led approach that optimises the capacity of sites, including site allocations.”*

5.6. The ‘design-led approach’ is explained in D). Relevant to this scheme, the policy states:

*“Development proposals should:*

*Form and layout:*

- 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.*

*Quality and character:*

- 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*

- 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.”*

5.7. The policy continues in its explanatory text: *“3.3.7 Developments that show a clear understanding of, and relationship with, the distinctive features of a place are more likely to be successful. These features include buildings, structures, open spaces, public realm and the underlying landscape. Development should be designed to respond to the special*



*characteristics of these features which can include: predominant architectural styles and/or building materials; architectural rhythm; distribution of building forms and heights; and heritage, architectural or cultural value. The Mayor will provide further guidance on assessing and optimising site capacity through a design-led approach.”*

- 5.8. Further guidance mentioned in D3 is included in London Plan Guidance: Optimising Site Capacity: a design led approach Consultation draft February 22 (LPG OSC). 1.1.1 states: *“Good growth across London requires development to optimise site capacity rather than maximising density. This means responding to the existing character and distinctiveness of the surrounding context and balancing the capacity for growth, increased housing supply, and key factors such as access by walking cycling and public transport, alongside an improved quality of life for Londoners. Capacity testing should be the product of the design-led approach not the driver.”*
- 5.9. The LPG OSC 1.1.2 continues: *“The design-led approach is the process of setting site-specific design parameters and codes for development sites to provide clarity over the future design. The design (or development) parameters, referred to in this document, are a set of high-level strategic parameters that address the form, massing and layout of a future development. These should be informed by a site-specific design vision which prioritise placemaking at the heart of their formation.”*
- 5.10. The reference of form and layout, quality, and character, required as part of a ‘design-led approach’ to developing sites is aligned to the NDG’s principles to designing ‘well-design places’.
- 5.11. Similarly, the *“special characteristics”* in D3 refer to concepts of built form and identity present in the NDG. This is the same process advised in the LPG OSC. The NPPF, NDG and London Plan have the same criteria for design and what constitutes good design.

- 5.12. At Core Strategy level, the expectation for design is one that does not cause harm but is positive to local characteristics and enhances poor design. What is meant by this is expanded on DM1 Achieving a High Standard of Development.
- 5.13. DM1 A states: *“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.”*
- 5.14. DM1 B states: *“The assessment of the design and layout of proposals will have 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.”*

- 5.15. Policy DM1 Design and Layout Considerations explanatory text states in 2.4: *“The massing, bulk, scale and height of buildings are significant components of an area’s character and help to convey the distinction between urban, suburban and semi-rural parts of the Borough. Consideration of these components should therefore be informed by location: whether the site is in a town centre; industrial estate; a residential area; or is in the Green Belt. However, the surroundings of the site will also be important in the consideration of these components: whether the massing, bulk, scale and height of buildings are part of the area’s sense of place; whether the site forms an interface between one type of location and another; and how the proposed building would relate to existing buildings, including any impacts on neighbouring occupiers.”*
- 5.16. This policy follows the same design methodology that developments should follow as the ‘design led approach’ of the London Plan.
- 5.17. London Plan’s Policy G2 ‘London’s Green Belt’ states: *“The Green Belt should be protected from inappropriate development: 1) development proposals that would harm the Green Belt should be refused except where very special circumstances exist.”*
- 5.18. The policy explains the character of the Green Belt in the explanatory text 8.2.22: *“Openness and permanence are essential characteristics of the Green Belt, but, despite being open in character, some parts of the Green Belt do not provide significant benefits to Londoners as they have become derelict and unsightly. This is not, however, an acceptable reason to allow development to take place. These derelict sites may be making positive contributions to biodiversity, flood prevention, and climate resilience. The Mayor will work with boroughs and other strategic partners to enhance access to the Green Belt and to improve the quality of these areas in ways that are appropriate within the Green Belt.”*
- 5.19. The Green Belt London Plan policy is important as it states the character considerations of Green Belt, which would be the basis when undertaking an assessment of context as part of the ‘design-led approach’.

- 5.20. At Local Authority level, Harrow's Core Strategy CS1 B states: *"Proposals that would harm the character of suburban areas and garden development will be resisted. All development shall respond positively to the local and historic context in terms of design, siting, density and spacing, reinforce the positive attributes of local distinctiveness whilst promoting innovative design and/or enhancing areas of poor design; extensions should respect their host building."*
- 5.21. Harrow's Core Strategy CS 7 Stanmore & Harrow Weald states about the HWR ASoC: *"A) Development will be managed to maintain the special character and identified views of Harrow Weald Ridge."*
- 5.3. Harrow's Development management Policy DM6 'Areas of Special Character' states: *"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."*
- 5.4. DM6 explanatory text 2.37 explains the value of Harrow Weald Ridge: *"The strategic value of the Harrow Weald Ridge and Pinner Hill area of special character is as a significant landscape backdrop that comprises extensive tree cover, including the cumulative contribution of small groups and individual trees, and major open areas. The boundaries of the Harrow Weald Ridge and Pinner Hill area of special character largely coincide with those of the Green Belt, and this underlines the strategic importance of the area's openness, to be safeguarded from inappropriate development."*
- 5.5. DM 6 explanatory text 2.39 explains: *"As described above, parts of Harrow Weald Ridge, Pinner Hill and Harrow on the Hill provide substantial tree cover and extensive tracts of open and natural land. These in turn give rise to environmental consequences that make a positive contribution to their special character. In particular, they provide significant areas*

*or relatively low light, air and noise pollution, as well as places for undisturbed habitat formation and wildlife movement.”*

- 5.6. Though the site is not in the Harrow Weald Conservation Area, the Harrow Weald Conservation Area Supplementary Planning Document (HWCA SPD) mentions the HWR AoSC and its Green Belt designation. It states: *“The designation helps to preserve the openness between dwellings and to fields helping to preserve the character of the area.”*
- 5.7. HWR AoSC identified character is providing a landscape backdrop via small groups of individual trees and major open areas. These areas provide low light, air, and noise pollution as well as spaces for habitat and wildlife movement.
- 5.8. These policies refer to building design and form as key characteristics to consider in assessing the quality of schemes and whether they are suitable for the proposal’s context.
- 5.9. There is a ‘golden thread’ running from London Plan to Harrow DM policies in terms of design expectation and how good design is assessed. This thread starts at the NPPF. This will now be explained.
- 5.22. The NPPF Chapter 12 Para 126 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, local planning authorities and other interests throughout the process.”*
- 5.23. The paragraph makes it clear that planning and development should achieve high quality, beautiful and sustainable places. The requirement of good design is key to deliver this.
- 5.24. Para 130 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.”*
- 5.25. Para 134 states: *“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*
- 5.26. In terms of the spatial designations that the site has, Para 137 of the NPPF states: *“The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.”*
- 5.27. Both the NPPF and London Plan state openness and permanence as an essential characteristic of Green Belt.
- 5.28. The NPPF clearly states that schemes should refer to principles set out in LPA and national policies and guidance to ensure schemes are ‘well designed’ or would be refused.
- 5.29. The National Design Guide (NDG) expands on design approaches that would meet NPPF’s Para 130 a) to d) and 134 in terms of what ‘well design’ means.

- 5.30. The NDG presents 10 characteristics that constitute a ‘well-design’ place. Relevant to the appellant’s scheme are Context, Built Form, Identity and Nature.
- 5.31. NDG’s Context Section C1 41) states: *“Well-designed new development responds positively to the features of the site itself and the surrounding context beyond the site boundary. It enhances positive qualities and improves negative ones.”*
- 5.32. NDG C1 43) states: *“Well-designed new development is integrated into its wider surroundings, physically, socially and visually. It is carefully sited and designed, and is demonstrably based on an understanding of the existing situation, including:*
- *the landscape character and how places or developments sit within the landscape, to influence the siting of new development and how natural features are retained or incorporated into it;*
  - *patterns of built form, including local precedents for routes and spaces and the built form around them, to inform the layout, grain, form and scale – see Built Form;*
  - *the architecture prevalent in the area, including the local vernacular and other precedents that contribute to local character, to inform the form, scale, appearance, details and materials of new development – see Identity.”*
- 5.33. The NDG therefore states that ‘well-designed’ places respond and is rooted to its surrounding context, aims to enhances its positive qualities and improve on negative ones. This is achieved by designing considering built form and identity of the development.
- 5.34. More detailed points on Built Form states in NDG B1 66: *“Built form is determined by good urban design principles that combine layout, form and scale in a way that responds positively to the context.”*
- 5.35. NDG B2 68 continues: *“The built form of well-designed places relates well to:*
- *the site, its context and the opportunities they present;*
  - *the proposed identity and character for the development in the wider place;*
  - *the lifestyles of occupants and other users; and*

- *resource efficiency, climate change mitigation and adaptation. See Resources.”*

5.36. ‘Well-designed’ built form is therefore rooted in context, character, use and resource efficiency.

5.37. More detailed points on Identity are stated in NDG I1 53: *“Well-designed new development is influenced by:*

- *an appreciation and understanding of vernacular, local or regional character, including existing built form, landscape and local architectural precedents;*
- *the characteristics of the existing built form – see Built Form;*
- *the elements of a place or local places that make it distinctive; and other features of the context that are particular to the area – see Context.”*

5.38. NDG I1 56 elaborates on ways in which I1 53 can be met in design terms: *“Well-designed places contribute to local distinctiveness. This may include:*

- *adopting typical building forms, composition, articulation, proportions, features, materials, details, patterns and colours of an area;*
- *drawing upon the architectural precedents that are prevalent in the local area, including the proportions of buildings and their openings;*
- *using local building, landscape or topographical features, materials or planting types;*
- *introducing built form and appearance that adds new character and difference to places, with particular attention to how buildings meet the ground and sky;*
- *creating a positive and coherent identity that residents and local communities can identify with.”*

5.39. I2 I57 refers to materials: *“Materials, construction details and planting are selected with care for their context. They are attractive but also practical, durable and affordable. They contribute to visual appeal and local distinctiveness. In well-designed buildings, the*



*materials and details suit the design concept, and they are consistently followed through the construction process to completion.”*

- 5.40. The identity of a “*well-design place*” is therefore rooted in contextual typological referencing and architectural precedent, using landscape or topographical features, appearance that adds new character, creates a positive identity for residents and local communities and materials that are contextual.
- 5.41. Lastly, relevant to this scheme, the NDG 90 refers to Nature: “*Nature contributes to the quality of a place, and to people’s quality of life, and it is a critical component of well-designed places. Natural features are integrated into well-designed development. They include natural and designed landscapes, high quality public open spaces, street trees, and other trees, grass, planting and water.*”
- 5.42. NDG 91 continues: “*Well-designed places:*
- *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.*”
- 5.43. ‘Well-designed places’ have nature integrated in schemes by incorporating natural features and prioritise natural ecosystems.
- 5.44. The principles set in DM1 aligns with the ‘design-led approach’ of the London Plan and principles to design ‘well-designed places’ of the NDG, as highlighted in Para 134 of the NPPF.

- 5.45. There is a 'golden thread' of design policies from NPPF, London Plan and Harrow CS and DM that is clear in expectation on design quality and importance of character in design.
- 5.46. The importance of context in informing good design is made clear in this policy 'golden thread'.
- 5.47. Another point that is important to consider that should inform the building is type and architectural precedent.
- 5.48. Type is an amalgam of scale, layout, proportions, appearance and use which become representative of a particular building use and form.
- 5.49. Type as a design concept is used to inform a design decision as a type represents a recognisable building and use. This allows developments to be sympathetic to its context.
- 5.50. Designing to respond to a character and with typology allows design appraisal to avoid subjective views as assessments are anchored on a given context and built precedent.
- 5.51. The NDG and London Plan D3 refer to type in defining good quality design.
- 5.52. NDG B2 67 states: *"Well-designed places use the right mix of building types, forms and scale of buildings and public spaces for the context and the proposed density, to create a coherent form of development that people enjoy."*
- 5.53. NDG I1 56 expands this by listing the adoption of typical forms and architectural precedents in designing 'well-designed places'
- 5.54. London Plan policy D3 also states this in D3 D) 1 and 11. The policy explanation text of policy D3 3.37 also lists type as a 'special characteristic' to consider as part of the 'design led approach'.
- 5.55. DM 1B relates to the aspects that define type in DM 1B a) and b) by referring to design that regards massing, bulk, scale, and height in relation to the location, as well as appearance that have regard to architectural inspiration, detailing, roof form, materials, etc.
- 5.56. The correct use of typological reference and precedent to inform a design is therefore key in delivering high quality design.

- 5.44. From a policy review, the spatial designations define the open character of the site. From a 'design led approach' view, the design must respond to this context, via the scheme's design components, such as massing, layout, typology and material, as stated across the design policy 'golden thread'. This is the context in which the scheme is meant to *"respond positively"* as per CS1 B, via the approaches presented in London Plan D3, Harrow DM1 and the NDG built form, identity, and nature sections.

## 6. IMPACT ON THE CHARACTER AND APPEARANCE OF THE SURROUNDING AREA

- 6.1. I will now explain how the appellant's scheme has not met the above-mentioned design policies and is therefore harmful to the character and appearance of surrounding area.
- 6.2. This will be done comparing the appellant's proposal with the former club house assuming no fire damage as well as the current residual structure condition.
- 6.3. The character of the area is the open character and major open areas as stated in the HWR AoSC and Green Belt policies. This semi-rural character is what the appellant scheme does not, in my view, design sensitively for and therefore impacts negatively.
- 6.4. The policy breaches will be explained in terms of how the scheme has not met DM 1B, which follows the 'design led approach' principles of the London Plan as well as reference to built form and identity from the NDG, which the NPPF refers to in Paragraphs 130 and 134.
- 6.5. In terms of the building, the design has been informed by the barn type. Considering the character of the area is open, this is an appropriate building type reference as it borrows from traditional and historic rural use of the HWR AoSC. It is also suitable in that barn architecture maintains the open character due to utilitarian reason of working the fields, but also in its rural vernacular connotation which is also part of the historic broader character of Harrow's open land.

- 6.6. The appellant's design impact derives from a misreading of type and how it informed its design. Typological reference is an important part of the 'design led approach'.
- 6.7. The DAS pages 36 and 56 shows precedents images of modern barn precedents to inform form, layout, and material palette. These precedents show the misreading of type.
- 6.8. Two of the projects on p. 36 are residential barn conversions: Long House by Bureau de Change architects and Loughloughan Barn by McGarry Moon Architects. The other project is not referenced and appears to be residential based on the image.
- 6.9. The projects on p. 56 are Stealth Barn by Carl Turner Architects, which is a workspace/self-contained accommodation, House in Krostoszwice by RS+ architects, which is housing and Weingut Hogl by Ludescher + Lutz Architetekten which is a winery.
- 6.10. While updates and deviation from a type are part of developing projects and hybridising functions (e.g. a barn house turned into workspace), there is consistency of building design and form that makes the use of type effective tool to design with the character of an area.
- 6.11. I will explain how the appellant has not done this and resulted in a scheme that harms the character of the area due to its building design and form.
- 6.12. In terms of setting, the topography of the site and screening by tree lines does mean that it is less visible from outside the site. The appellant's Landscape & Visual Appraisal (LVIA) establishes viewpoints based on this extent of visibility and I agree with the photo viewpoints placed.
- 6.13. I will focus on the impact to viewpoints 1,2 and 3.
- 6.14. The LVIA images do not show a winter setting. The screening from trees shown in the LVIA will therefore be less effective during winter. This is stated in 4.48 of the LVIA.
- 6.15. I disagree with the LVIA 6.38 stating: *"the proposed development will be of a high quality in its materials and design which responds to the wider landscape contexts and its surroundings."* This statement is intended to support the development in the landscape as being of low susceptibility. I disagree with the LVIA section on 'Relationship with the

existing built form on site' and the 'Visual Effects' that state that there would be no harm to HWR AoSC. This section will demonstrate how the scheme is unsympathetic to its surrounding area and therefore cause harm.

- 6.16. I will assess the design deficiencies of footprint, massing and material that harm the character and appearance of the surrounding area and make the scheme not policy compliant, in line with the 'design-led approach' and 'well designed places' methodology.

## FOOTPRINT

- 6.17. The proposed scheme would increase the footprint compared to the former golf club house. This is owed to the Banqueting House programme where a combination of front and back of house, function hall and ancillary facilities are required.
- 6.18. This differs from the footprint of the golf club house and residual structure that is arranged in a linear and narrow way. Fig. 1 shows both footprints overlaid to illustrate this difference.
- 6.19. The DAS explains the process that has led to reduction of footprint and having a footprint increase of 30%. The fundamental issue lies in how this increase has been distributed in an unsympathetic way within its context, prioritising instead the compactness of the layout which benefits the use of the banqueting house, to the detriment of the character of the area. This is something the golf club house did not impacted on, nor the residual structure.
- 6.20. The DAS p. 24 explains: *"The client's initial direction was to replicate the existing spaces that they have in central Harrow. We visited and reviewed the existing building and compiled a space schedule as a starting point for the brief."* The DAS p. 25 states: *"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."*
- 6.21. The DAS shows adjacency diagrams that confirm the best layout for the relationships of uses as required by flows of use (Fig. 2). The brief centred around a "compact scheme".

- 6.22. This point of adjacency is important to highlight: in plan there are rooms which are meant to be adjacent in order to facilitate a particular flow which benefits the functioning of the building's programme, in this case Banqueting House.
- 6.23. The appellant's DAS also explains: *"In terms of footprint, it is important to keep as many functions as possible on the ground floor. The banqueting, toilets, kitchen, and reception areas should all be on the same level to encourage accessibility and movement between the spaces. Only secondary functions such as meeting rooms, the Bridal Suite and Secondary Function Space were located on the upper level."* This room schedule requirement and its adjacencies results in an enlarged footprint that extends onto the open field.
- 6.24. The biggest space is the Function Hall, which has a footprint of approximately 27.5m x 20m, extends the footprint significantly and onto the field due to the demands of the Banqueting House use. Fig. 3 from the appellant's DAS show how this space is envisioned to be used. This is the main space of the banquets to be hosted.
- 6.25. Having to include the Function Hall contiguous to other areas of the Banqueting House in the same floor expand the footprint to go beyond that of the former golf club house.
- 6.26. The siting iterations shown on DAS pages 30 and 34 show the footprint shifting from alignment with the golf club house or moved forward towards the car park area to reduce the extent of the Function Hall moving beyond the club house's footprint. The design maintains the adjacencies as proposed with no changes. The proposed location is close to the former golf course club house footprint and next to the existing car park for convenience of operations and compactness.
- 6.27. From a 'design-led approach' perspective, the appellant's scheme has mostly attempted to contain the Banqueting House programmatic requirement into footprints that are convenient for its use, rather than basing on a thorough typological review of barn layouts that could have informed a layout and not just a barn like massing or appearance.

- 6.28. The Design Review Panel stated: *“The Panel invites the applicant to consider creating a more cohesive collection of buildings, celebrating interstitial space by pulling the buildings apart. A courtyard is a common typology in rural settings. This would allow an opportunity to design for the context and maximise the benefits of the new rural setting with gradual thresholds between outside and inside.”*
- 6.29. The precedents shown in the DAS are all part of barn complexes as contemporary additions or as standalone homes in proximity with other buildings. Fig.4 shows Wengut Högl winery in context. Fig. 5 shows Stealth Barn in context. Fig. 6 shows Long House in context. These projects have interstitial spaces due to adjacency with other buildings.
- 6.30. No project is located as a standalone object building in an open field setting. Barns are also traditionally arranged in groups, as stated by the DRP.
- 6.31. The DAS section 4.10 shows studies on internal courtyard, but these were discontinued in favour of compactness.
- 6.32. By following this approach, the building centralises all activity within its footprint and has landscape around it as routes to specific points for the use of guests. This separation of building and landscape, while compact, is a missed opportunity to better integrate the use with the building type without impacting on the open character of the area.
- 6.33. This approach also makes the building more visible from viewpoints 1, 2 and 3, compared to the former golf club house and residual structure because of how adjacencies lead to an enlarged footprint.
- 6.34. Compared with the existing golf club house or its residual structure, this visibility due to footprint enlargement will cause harm to the character and appearance of the surrounding area.
- 6.35. The appellant’s approach for compactness, informed by operational requirements of the Banqueting House use, did not undertake a ‘design-led approach’ development of the site responding to its character, which is open, and did not develop its building footprint from

context, type or architectural precedent to inform a context specific design, as stated in NDG, London Plan and Harrow DM policies.

- 6.36. The appellant's scheme therefore does not meet policies London Plan D3, Harrow CS1 and DM1 or meet NDG guidance on built form and identity.

## MASSING

- 6.37. In terms of height, the proposed scheme sits lower than the envelope of the former golf club house. Fig. 7, from the appellant's Design and Access Statement (DAS), shows this.

- 6.38. Tying the height of the proposed scheme with the club house is a sensitive response to height, however, this is undermined by the increase in footprint and changes to roof form.

- 6.39. The building's massing has increased compared to the club house. This enlargement of the footprint is shown in Fig. 1.

- 6.40. The roof form proposed is limited in its pitch roof in comparison with the former golf club house which had more pronounced pitch (Fig. 8).

- 6.41. This more pronounced pitch follows the example of barn houses, such as Headstone Manor (Fig. 9).

- 6.42. In terms of the Function Hall, the largest room of the appellant scheme, it is a flat roof. While this lessens its impact on the open character of the site, it is also alien to barn design and does not add an element of celebration to the Banqueting Hall building itself, considering its function.

- 6.43. The DRP was critical of the Function Hall in having an *"underwhelming spatial condition that opens onto a north facing garden, leading to a disjointed experience for guests."*

- 6.44. The appellant's scheme also introduces massing protrusions to accommodate Banqueting House programmatic requirements such as the function room on the first floor (Fig. 10).

- 6.45. These changes from the appellant's scheme break the typological barn reference, which is more in keeping with open and semi-rural character, which the former golf club house



building more effectively referenced with its steep pitched roofs and less expansive massing.

- 6.46. The proposal's height therefore does not meet DM1 as its height and roof form does relate to its context and local character, as stated in DM 1 B) j).
- 6.47. It does not meet London Plan D3 as the building does not respond positively to local distinctiveness in its scale, with due regard to building type forms and proportions.
- 6.48. It does not meet the NDG I1 56 as it does not contribute to local distinctiveness in its non-adoption to typical building form.
- 6.49. In terms of how height is seen from viewpoints, Fig. 11 shows viewpoint 1 and Fig. 12 shows viewpoint 2 from the LVIA which would be visible.
- 6.50. Viewpoint 1 is less visible than viewpoint 2 in terms of receptors due to it being visible from pedestrians, cyclists or drivers coming from the north to the south at various speeds.
- 6.51. Viewpoint 2 is more visible as it is the entrance to the site.
- 6.52. In both cases, the screening shown in the image would be less in a winter setting.
- 6.53. The former golf club house, Fig. 13 from the appellant's statement of case appendix 1, shows the massing to the rear of the plot and hidden by trees towards the foreground.
- 6.54. This impression of the building seen further away from the entrance is due to the massing that centres height to the middle of the footprint, located in the middle of the site.
- 6.55. This differs from the appellant's scheme that has moved massing and bulk closer to the entrance and would make it more visible from Brockley Hill. There is also landscaping pruning that would make the building more visible. Fig. 14 from the appellant's Supplementary Openness and Landscape Assessment shows this. This would make it more visible from viewpoint 2 compared to the former golf club house and residual structure.
- 6.56. The roof form and dark material palette also increases the contrast of the building with the landscape setting, drawing attention to it. This causes harm to the open character that the

former golf club maintained with a more restrained massing and more considerate location of height and footprint.

- 6.57. Comparing the appellant's scheme to the residual structure, the appellant's scheme would have more of an impact to the open character. The structure allows for views to the tree line, which a solid building would not. Fig. 15 shows this.
- 6.58. Also, the current condition of overgrowth masks the structure more than what a more pruned entrance would look like. This additional screening is cause from the unkempt state, but which mask the view from outside and therefore keeping the open character from this vantage point.
- 6.59. From these viewpoints, and in particular a winter setting, the appellant's building design would harm the open setting, compared to the residual structure and therefore impact on the open character of the Green Belt and HWR AoSC.
- 6.60. The appellant's scheme, due to its height, will also be seen from the south. Fig.16 shows viewpoint 3 from the LVIA. While the vegetation is thick, a winter setting would allow views into the site.
- 6.61. This view is visible for people coming by foot or bike as it is a view through to the centre of the site. This would be less visible to people by car due to speed of travel.
- 6.62. The appellant has not prepared a 3d visualisation of the proposal from this viewpoint. To assess the impact of the building, therefore, the plan and height gives an indication of how wide the building would look from this viewpoint. In plan, as with viewpoint 1, this would be a point where the building would be seen widely due to its compact nature and massing.
- 6.63. In terms of the residual structure, Fig. 16 also shows how the beams and overgrown vegetation coalesce, making it difficult to distinguish one or the other.
- 6.64. In a winter setting, this would be less the case, but the see-through nature of the structure would mitigate this and be less of an impact than a full building would.

- 6.65. From these viewpoints, and in particular a winter setting, the appellant's building design would harm the open setting, compared to the former golf club house and residual structure and therefore impact on the character and appearance of the surrounding area due to its more distinct visibility due to massing.

## **MATERIAL**

- 6.66. I understand that points of material can be conditioned, however, this assessment reiterates the limited 'design led approach' the appellant scheme has done which harms the character of the site.
- 6.67. The material choice is linked to the design's form, type and misreading of its context making the design issue more fundamental than what a condition could address.
- 6.68. The DAS cited local vernacular references to inform form and materials (p. 22). The palette includes brick, stone, timber, render and slate. From this, the appellant's scheme then drew a material palette shown in DAS p. 55. It then shows contemporary projects that use a similar palette in p.56.
- 6.69. In my view this approach to material referencing and precedents referencing to support this choice is incorrect and is a limited 'design-led approach' to designing in this context.
- 6.70. The local vernacular has a similarity in scale and form owed to the same domestic requirements each dwelling has. A Banqueting House, on the other hand, is a different building type and has a different massing and scale.
- 6.71. Furthermore, the siting for each building type is completely different: houses near the site are part of streets with grand homes where one can see each home successively, whereas the Banqueting House would be in a Green Belt plot as stand-alone object building.
- 6.72. This difference in scale, type and location would require a different material palette referencing to address the sensitivity of its setting.

- 6.73. The barn house approach is a relevant typological and material reference as it is associated to the context of open fields and often barns have been converted for social uses at the scale and use proposed by the appellant's design.
- 6.74. The contemporary references on p.56 would support all black approach proposed, however, all these projects have a different context that justified this approach which are not shared by the appellant's scheme.
- 6.75. Stealth Barn by Carl Turner Architects is part of a farm complex where the new all black building is a counterpoint to the existing buildings which have traditional red brick and tile (Fig. 5). In scale and massing, the new building is sensitive to the other buildings and only contrasting by material choice.
- 6.76. House in Krostoszowice by RS+ architects is a family home and therefore has no bearing in its referencing. Purely on material terms, the building's sharp roof form has direct references with the high pitch roofs of nearby dwellings and roofing material. Having an all-black pair of elements, which are supported by a concrete plinth, is a counterpoint to the wider context of black pitched roof houses with varying bright colours (Fig. 6). The setting is residential and therefore also not relevant to the appellant's scheme.
- 6.77. Weingut Högl winery by Ludescher + Lutz Architekten is located at the base of a hill. It is part of a suite of other buildings that is the vineyard complex. In terms of roof form, it is an exaggerated pitch, but following the high pitch roof forms of nearby buildings. In terms of colour, it is different from its immediate context, contrasting black and white with the other traditional red tiles and white render buildings. The building does not sit in isolation but is part of a group of buildings and wider area that is also developed (Fig. 4).
- 6.78. All three projects the appellant uses to inform its material choice have had their material choice justified by a setting that can be contrasted and are not in isolation. This is an important point that informs their design.

- 6.79. The appellant limited appraisal of these projects undermines its decision to pursue an all-dark building in a sensitive open setting. The proposal is not sited as part of a group of buildings to act as a counter point to but instead results in an object building drawing attention and impacting on the open character due to its material choice.
- 6.80. The choice of dark material makes the building more visible from viewpoints 1, 2 and 3. It will particularly be more visible from Viewpoint 2 (Fig. 12), compared with the former golf club house and residual structure.
- 6.81. The design therefore is harmful as it impacts the open character and appearance of the surrounding area.

## **7. IMPACT TO THE CHARACTER AND APPEARANCE OF THE SITE**

- 7.1. The experience around open land in Green Belt or HWR AoSC is parcelled due to the historic farmland and parklands which breaks an open landscape experience. In this regard, it is important to consider the impact within the plot itself as well as the wider setting as seen from outside the site.
- 7.2. The appellant's LVIA presents a Site-Specific Character Plan in p.8 which refers to southern boundary tree line and mature woodland. It does not refer to the northern boundary tree line which frames the wider site.
- 7.3. 3.24 of the LVIA states that there are no landscape features to the northern edge of the site. This is true if considering the red boundary line. Beyond the site boundary line, and beyond the golf course, there is a tree line. Fig. 17 of the LVIA shows this in the distance.
- 7.4. It is important to acknowledge this as the experience of the open character from within the site should also consider these views out.
- 7.5. I also disagree with 3.34 considering the character of the site as being urban fringe. Aside from the rubble from the fire damage, the unkempt state has allowed the golf course to overgrow. The experience is now of more open landscape than it would have been previously when the golf course was in operation.

- 7.6. I will assess the design deficiencies of footprint, massing and material that harm the character and appearance of the site and make the scheme not policy compliant, in line with a 'design-led approach'.

### **FOOTPRINT**

- 7.7. In terms of the building's footprint, the Banqueting House room and capacity requirements result in the extension of the building towards the open land, which erodes the quality of the site's open character.
- 7.8. The current landscape is open due to the separation of golf club facilities to the south, but also the grounds have overgrown acquiring a natural state. Fig. 18 shows this east view.
- 7.9. The siting of the expanded footprint of the appellant's scheme impacts on open character of the views from within the site as seen from the north to the south.
- 7.10. There is no evidence in the appellant's DAS of alternative siting of the proposed layout being explored to reduce impact on open character. The only changes have been reduction the footprint of the elements that extended towards the open land by shifting the buildings closer to the car park and room size reductions.
- 7.11. This is insufficient and does not consider the open character compared to the former golf club house and the residual structure, therefore, the siting of the building harms the open character of the site as seen from within.

### **MASSING**

- 7.12. The former golf club exploits the topographical rise of the site by keeping 1 storey areas on the flanks of the central two storey pavilion, within the same arc footprint, lessening views from the north to the south of these elements as one walks towards the north, maintaining the open character.
- 7.13. From within the plot when seen from north to south, the central height in the arc is less intrusive to open character due to this careful massing consideration.

- 7.14. The appellant's scheme, on the other hand, while it reduces the flank elements, it proposes a taller than one storey structure in the Function Hall which extends forward, becoming a more visible element when seen from the north to the south.
- 7.15. In terms of height, the residual structure is less dominant than what an undamaged building would be. Fig. 19 shows how the structure is seen among the tree line backdrop and how the state of the beams blend with the landscape.
- 7.16. The current state of the building, while of very low quality due to fire damage, has a sense of open character as its height is maintained under the tree line (Fig. 20). Height is concentrated in the middle of this arc footprint and, due to the state of the residual structure, allows for views to the tree line to the rear of the site.
- 7.17. The appellant's proposal would harm the open setting of the site and would cause more harm compared to what the former golf club house and the residual structure do.

#### LANDSCAPE DESIGN

- 7.18. While landscape matters can be conditioned, the appellant's scheme introduces design features that undermine the open character of the site and impact on the character of the Green Belt and HWR AoSC. This would make conditions ineffective to address this impact.
- 7.19. From a 'design-led approach' perspective, a scheme working on this sensitive context would consider landscape and views of open character as its main priority in the arrangement of spaces and massing to acknowledge this sensitivity.
- 7.20. The proposed landscape, which is set within a smaller site red boundary line than the former golf course use, introduces a mound with architectural naturalistic planting (Fig.21). This is a new landscape feature that would break the sense of open character when seen from the south to the north.
- 7.21. This would impact the HWR AoSC which is characterised by "*significant landscape backdrop that comprises extensive tree cover (...), and major open areas*" as mentioned in DM6 2.37 and "*extensive tracts of open and natural land*" as stated in DM6 2.39. The "*open*" character

mentioned in the HWCA SPD is an important reference that should have been considered in designing the landscape strategy. The SPD also states: *“3.4.2 Harrow Weald Ridge provide an elevated horizon of tree cover and open countryside which spans across the north of the Borough and acts as a visual reminder that Harrow is an outer-London borough, a transition between the highly urbanised characteristics of central and inner London and the more rural character of the counties beyond.”* The landscape design would break this tree cover and open countryside characteristic of Harrow Weald Ridge.

- 7.22. This mound would frame the open land in front of the Banqueting Hall room, offering space for visitors to the outside, but this is a private benefit to users at the expense of the open character which is the key characteristic of Green Belt and the HWR AoSC.
- 7.23. I disagree with the LVIA report claim that the *“Landscape edge will assimilate the new building into the surrounding area and will create a vegetated edge to the site which will separate the site from the open and undeveloped land to the north.”* This edge would further undermine the open character of the Green Belt.
- 7.24. The mound as proposed is not a necessity for the purpose of the Banqueting House. There is a programmatic need to separate Banqueting Hall use and open land beyond the red boundary line, but this should have been done subtly and sensitively to maintain the open character which is a key characteristic of the open character of the area.
- 7.25. The appellant’s scheme building and landscape design, due to an approach that does not improve on the open character, has an impact on the open character of the site’s Green Belt and the HWR AoSC designations.

## HARDSTANDING

- 7.26. The building maintains the location of building footprint, parking space and expands on the landscape by creating an area for Function Hall use. This does not improve or enhance the open character.



- 7.27. In terms of hardstanding, the current site has low quality parking spaces that the appellant's scheme will develop. There is no reduction in hardstanding area, rather cosmetic and layout improvements to provide for the expected traffic and parking demands of the Banqueting House use. Therefore, there is no improvement from the current extent of development or lessening on the impact on the open character.
- 7.28. Indeed, considering the use and frequency of visitors associated to the proposed Banqueting House use, the traffic load would be higher than in a golf club setting and therefore impacting on the open character due to traffic.

## 8. POLICY CONFLICT

- 8.1. The scheme conflicts with character policies of the London Plan G2, Harrow Core Strategy CS7 A and Harrow Local Plan DM 6. These policies clearly define the open character of the area and state that insensitive development will be resisted. The appellant's scheme, in my view, did not develop a sensitive scheme and therefore is contrary to these policies.
- 8.2. The scheme conflicts with design policies of the London Plan D3 1, 11 and 12, Harrow Core Strategy CS 1B and Harrow Local Plan DM1 in not following a 'design led approach', resulting in an unsympathetic development that harms the character and appearance of the area.
- 8.3. In terms of the NPPF, it is conflict with paragraphs 126, 130 and 134. Reference to the NDG has also been made to illustrate how the NPPF design policies are meant to be interpreted to deliver 'well designed' places.
- 8.4. While the NDG is guidance, the scheme is conflicts with 3 of the 10 characteristics: Context, Built Form, and Identity.
- 8.5. These non-compliances resulted in a scheme that is unsympathetic and causes harm to the character and appearance of the site, its Green Belt and HWR AoC designations due to its building design and form.

## 9. RESPONSE TO THE DESIGN REVIEW PANEL REPORT

- 9.1. A DRP Panel comment letter was issued on 10<sup>th</sup> July 2022.
- 9.2. I agree with the Panel's key recommendations on delivering an exemplar approach to sustainability, having a cohesive identity between the buildings with different forms of massing to sit comfortably within the landscape, siting of the entrance and building to use natural setting better, more care on designing of spaces considering their needs and exploration of interstitial spaces.

## 10. CONCLUSION

- 10.1. This proof of evidence has presented why the appellant's design has been deemed unsympathetic and obtrusive to the open setting, to the detriment of the character and appearance of the locality.
- 10.2. The design and character policies listed in RFR 2 have been reviewed and how they have been breached. Fundamentally, the appellant's scheme has not regarded the sensitive context adequately with its proposal and instead undertook a limited 'design led approach' which favoured its operational requirements, to the detriment of the scheme's relationship with its setting, resulting in harm to the open character.
- 10.3. This insensitive design is evident in the scheme's larger footprint and siting due to the Banqueting House requirements, which encroaches beyond the former golf club house, its sited closer to the entrance, and presents a scheme that is taller and wider.
- 10.4. This harm is visible from outside the site from viewpoints 1, 2 and 3 identified in LVIA and from within the site
- 10.5. The scheme also presented a limited typological referencing, not following barn typology in form and layout, as suggested by the DRP, resulting in an incongruous massing, height, and materials.

- 10.6. The building's design and form therefore resulted in a scheme that harms the open character of the area, characteristic of the Green Belt and HWR AoSC designations.
- 10.7. In terms of landscaping and hardstanding, there is harm to the open character from outside by siting the building closer to Brockley Hill, breaking the continuous landscape of the golf course with a proposed new mound within the Banqueting House site boundary and enlarging the hardstanding to accommodate the traffic requirements of the Banqueting House, further eroding the open field setting.
- 10.8. Compared with the existing former golf club house and its residual structure, the appellant's scheme causes harm to the character and appearance to the site due to its insensitive design.
- 10.9. Working on sensitive settings require a careful response to the opportunities and constraints of a site. The site offered possibilities to make the constraints of open character key features from which a high-quality design scheme could have emerged. The appellant did not develop this to the level required of sites with sensitive character.
- 10.10. The appellant's scheme is therefore contrary to the design policies from the NPPF, NDG, London Plan and Harrow DM that prioritise context, character, and typology to inform high quality design and 'well designed' places. Therefore, the design is unsympathetic to Green Belt and HWR AoSC and therefore not compliant with NPPF, London Plan and Harrow DM policies protecting these sensitive areas from harmful development.