

Design (Form, Height, Bulk, Scale and Massing)
Proof of Evidence

TOWN AND COUNTRY PLANNING
ACT 1990 (AS AMENDED)
On Behalf of
WELWYN HATFIELD BOROUGH COUNCIL

Local Planning Authority Reference:- 6/2020/3420/MAJ
Planning Inspectorate Reference:- APP/C1950/W/22/3294860

bluepencil
DESIGNS

RIBA 
Chartered Practice

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1. Introduction

- 1.1 This proof of evidence has been prepared by Mette McLarney. I am the Founder and Director of Bluepencil Designs Ltd.
- 1.2 I am a Chartered Architect, and an elected member of the RIBA since 1990.
- 1.3 I have over 30 years experience as an architect and masterplanner. I spent 14 years as architect and masterplanner for Countryside Properties Plc becoming a Director and Group Chief architect in 2006. In that role I was responsible for masterplanning and ensuring design quality across the group. My responsibilities included the concept masterplans and design briefs and codes for award winning developments such as Accordia and Great Kneighton in Cambridge and Beaulieu in Chelmsford. All three developments are used as examples of good practice urban design in the National Design Guide and many other guidance documents.
- 1.4 In 2013 I formed my own practice, Bluepencil Designs Ltd specialising in residential design and masterplanning. Bluepencil Designs is a RIBA chartered practice. To date, Bluepencil Designs have completed 184 planning applications. We have a track record of 100% planning success.
- 1.5 I have been involved in the production of over 50 strategic masterplans across 16 different and have experience of the planning process at both local and national level.
- 1.6 My evidence will show I have assessed the the design proposals are not in line with the Broadwater Road SPG in terms of Scale, Height and Massing and as such are harmful to the character and context of the area. I will use the Broadwater Road Masterplan document and the Appellant's Design and Access statement in my report.

2. Declaration of Professional Compliance

- 2.1 My evidence has been prepared in accordance with the guidance and standards set by my governing body, The Royal Institute of British Architects.
- 2.2 I confirm that my report has drawn attention to all material facts which are relevant and have affected my professional opinion
- 2.3 I confirm that I understand and have complied with my duty to the Inspector as an Expert Witness which overrides any duty to those instructing or paying me, that I have given my evidence impartially and objectively, and that I will continue to comply with that duty as required.

- 2.4 I can confirm that I am not instructed under any conditional or success- based fee arrangement
- 2.5 I confirm that I have no conflicts of interest
- 2.6 I can confirm that I am aware and have complied with the requirements of the rules, protocols and directions applying to an Expert Witness giving evidence at a Planning Appeal Public Inquiry.
- 2.7 I accordingly confirm that the evidence which I have prepared and provide for this appeal in this proof of evidence is true and I confirm that the opinions expressed are my true and professional opinions.

3. Scope of my Evidence

- 3.1 My evidence relates specifically to the third reason for refusal (RfR3) set out by Welwyn and Hatfield Borough Council in their Notice of Decision for Refusal. (RfR3): Poor quality design and harm to Impact character and context of area (Reason for refusal 3; Policies D1 and D2 of the District Plan and the Broadwater Road West Supplementary Planning Document, Policy SP 9 of the emerging local plan and NPPF).
- 3.2 The Council's case is set out in their statement of case so I do not repeat it here but confirm that it stands as the Council's case on RfR3.
- 3.3 In the Statement of Common Ground the following matters are not agreed and I address them below.
1. The Council disagrees with the Appellant's view that the Appeal Scheme relates to the defining context of the Garden City and respects the immediate context of the site through appropriate height and massing.
 2. The Council disagrees that the appeal scheme will significantly enhance the townscape environment compared to the baseline position.
 3. The Council and the Appellant disagree as to whether RfR3 is justified with reference to Policies D1 and D2 of the District Plan, the Broadwater Road West SPD, Paragraphs 130 and 134 of the NPPF or Policy SP9 of the emerging Local Plan.

4. Evidence

4.1. Policy D1 – Quality of Design

The Council will require the standard of design in all new development to be of a high quality. The design of new development should incorporate the design

principles and policies in the Plan and the guidance contained in the Supplementary Design Guidance.

Policy D2 Character and Context

The Council will require all new development to respect and relate to the character and context of the area in which it is proposed. Development proposals should as a minimum maintain, and where possible, should enhance or improve the character of the existing area.

- 4.2 The Appellant's Design and Access Statement states that the Broadwater Road West Supplementary Planning Guidance has been followed. This document sets out clear guidance for form, bulk, height, scale and massing in para 6.14 and 6.17 where it states:

"6.14 New development should not, however, simply replicate existing building mass but relate to those buildings retained and the wider surrounding area."

"6.16 It is considered that lower rise buildings should generally be accommodated at the southern end of the site, responding to the adjacent residential character areas that the development will need to respect. Medium rise buildings should make up the majority of the site, particularly through the central band of the site and where located adjacent to the railway should provide an element of screening whilst seeking to retain views to the silos."

- 4.3 The site area is confirmed as 1.24 ha. The application is for 289 residential units. This gives a gross density on the site of 233 dph. The Broadwater Road West SPD Page 44 states:

"Practitioners in developing the masterplan has resulted in an average density across the site of 75dph. Policy H6 of the District Plan allows for densities in excess of 50 dwellings per hectare in central areas and in areas with good accessibility provided that the development does not have an adverse impact on the character of the surrounding area and complies with other design policies in the Plan."

- 4.3 The proposed density of 233 dph far exceeds the density guidance of 75 dph. Page 71 of the DAS shows the footprint of the existing building with an outline of the footprints of the proposed buildings overlaid and illustrates that the proposed footprint exceeds the existing.
- 4.4 The height of the existing building is described as 34.75m to the top of the chimney flues and 30.51m to the top of the stair tower. The proposed buildings are 29.45m. Page 67 of the DAS show elevations of the existing building with an outline of the proposed buildings overlaid. This drawing shows the proposed building outline

exceeds the height scale, mass and bulk of the existing building although it is 5.35m lower than the top of the chimney flues (tall but slender elements protruding from the main building mass) and 1.06m shorter than the stair core which projects above the main roof. Therefore the proposed buildings will be considerably higher than the mass and bulk of the existing building.



^ Existing & proposed massing overlay - view from south-west

Existing Buildings



^ Existing & proposed massing overlay - view from south-east

Existing Buildings

Figure 1. Extract from Design and Access Statement - page 70 showing proposed massing

- 4.5 Page 70 of the DAS show illustrations of models of the proposed design overlaid onto the existing building which represents an increase in height, bulk, scale and massing over the whole site and an increase in height in the northern part of the site.
- 4.6 The design development shows an attempt to reduce the height, bulk, scale etc. of the buildings by way of mansard roofs, with the design reference being the Neo Georgian roofs of Parkway. The proposed mansard roofs (containing two storeys) are sharply pitched and on many elevations are flush with the building facades rather than set back and therefore do not reduce the height, bulk, scale etc. of the

buildings. This is evidenced in the CGIs on pages 72, 76, 77, 80, 98, 123, 124, 156 and 158 of the DAS.

- 4.7 If the mansard roofs had been single storey and set back from the building facade behind a parapet (as in the examples shown on page 24 of the DAS) the ground level view of the building would appear to have a much reduced form, bulk and height and be of a more appropriate scale. Instead, the CGI on the pages listed above show an overbearing mass which does not reflect the Garden City aesthetic.



Figure 2. Garden City mansard roof



Figure 3. Proposed mansard roof

(Figures 2 and 3 are extracts from the Design and Access Statement)

- 4.8 The form, bulk, height, scale, and massing of the building mean it would be a very prominent feature in the townscape, visible from a greater range of vantage points and impacting not just on the immediate character and setting of the Appeal Site but the wider area of Welwyn Garden City. The Council's Supplementary Design Guidance requires that the characteristics of the garden city should apply "not only to the residential areas but also to the commercial and industrial areas of the town."

5 Conclusion

- 5.1 On behalf of the Council I confirm and maintain that the proposed development would not represent a high quality of design as a result of its excessive form, scale, bulk, height and massing and its relationship to adjoining land and buildings. It

follows that the departure from the prevailing built form of 2 to 4 storeys would mean that the proposed residential buildings of 4 to 9 storeys would not relate well to their context, resulting in an uncomfortable juxtaposition of the proposed built form with the existing built form. Moreover, by reason of their form, bulk, height, scale and massing, the appeal proposals do not achieve high quality design and also do not respect or relate to the character and context of the local area and so fail to maintain, enhance or improve the character of the existing area. The proposal would therefore be contrary to Policies D1 and D2 of the Local Plan, as well as conflicting with the guidance set out in the Broadwater Road West Supplementary Planning Guidance.