



Appeal Ref: APP/A3655/W/20/3265969
Appeal Ref: APP/A3655/W/20/3265974
Site Addresses: Land South of Kingfield Road
and East of Westfield Avenue, Westfield Avenue,
Westfield, Woking and Land South of Hoe Valley
School, Woking

WOKING FOOTBALL CLUB WOKING

**PROOF OF EVIDENCE OF
CHRISTIAN GILHAM
BA(HONS) DIP(ARCH)**

APRIL 2021 | 7884-L(00)732E

VERSION 6

PREPARED BY

LeachRhodesWalker





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1.0 My Experience.

1.0 MY EXPERIENCE

1.0.00 My name is Christian Jonathan Gilham. I am a director and owner of a design led, architects practice in Manchester, with offices in London employing over 80 staff.

1.0.01 The practice has been in existence for over 100 years, and I have been employed there for over 30 years.

1.0.02 I am a qualified architect, with a degree (first class) and a diploma (with commendation) in Architecture. I am a RIBA member and ARB registered. I work across a range of sectors which include residential, retail, hotels, offices, leisure, MSCP's and airports. I also work on many historic buildings, and in and adjacent to conservations areas.

1.0.03 As a practice I pride myself on good design whilst balancing the often conflicting/competing needs of commercial development, and believe I have a reputation for balancing these to achieve high quality, commercially successful, sustainable schemes, which do not stay on a drawing board.

1.0.04 My expertise is for projects from inception, through to town planning, and as a result my expertise is in the judgements and design approach that enables successful development of a site.

1.0.05 I work on residential projects from domestic scale homes through to high rise apartment buildings, in rural, suburban and urban locations, and also with many residential developers and institutions that purchase residential schemes, so I have a good understanding of all aspects of residential.

1.0.06 I have designed, gained planning, and have seen constructed over 10,000 new homes, many of which are apartment led projects.

1.0.07 As a practice we have won several awards, and many across my schemes, including civic trust awards and recognition regionally and nationally for our high quality buildings.

1.0.08 Leach Rhodes Walker were engaged by GoldDev Woking Ltd from the inception of the project to deliver a new high quality residential scheme, including a redevelopment of the football club.

1.0.09 I, with my team, have been involved in the design and refinement of the scheme over a period of 18 Months leading to the determination of the application, including several variants, and I believe this approach, along with the refinements I have made, balances a high quality destination and community, with the character and impacts on the surrounding site.

1.0.10 To show the depth of our successful commercial experience, some examples of the range of buildings across several sectors are shown adjacent, and on the following pages



Clippers Quay, Salford
614 Homes
Completed 2019



The Forge, Newcastle
294 Homes
Completed 2018



The Strand, Liverpool
394 Homes
Completed 2021

1.0 MY EXPERIENCE



Wharf Street, Altrincham, Cheshire
50 homes
Planning Approved 2020



Times Square, Warrington
£120M Mixed Use Regeneration
Completed 2020



Dallas Road, Bedford
342 Homes
Planning Approved 2021



Apex Tower, Manchester
90 Homes
Planning Pre-app



Parkview, Bristol
91 Homes
Planning Approved 2020



New Monaco, Birmingham
1054 Homes
Planning Approved 2021



2.0 Points That My Proof Intends To Address At Kingfield Road.

2.0 POINTS THAT MY PROOF INTENDS TO ADDRESS

2.0.00 This Architectural proof deals with reasons for refusal in relation to the Kingfield Road site only, and not for the Egley Road site. The proof is split into two parts, one that deals with Appeal topic area a, and the other that deals with Appeal topic area c. These refusal reasons that are being dealt with via this proof are below:

2.0.01 Reason for refusal 1 / Appeal topic area a.

2.0.02 *“By cumulative reason of its excessive height, bulk, mass, housing density and design the proposed development would fail to respect and make a positive contribution to the street scenes and character of the area in which it would be situated. The proposed development is therefore contrary to Policies CS10, CS21 and CS24 of the Woking Core Strategy (2012), Policy DM10 of the Development Management Policies DPD (2016), SPD Design (2015) and Section 12 of the National Planning Policy Framework (NPPF)”*

2.0.03 Reason for refusal 2 (non daylighting aspects) / Appeal topic area c.

2.0.04 *“The proposed development would result in significantly harmful impacts by reason of overbearing effect and loss of privacy to No.2 Westfield Grove and Penlan (Kingfield Green), significantly harmful impacts by reason of loss of privacy to The Cedars (Kingfield Green) and Nut Cottage (Kingfield Green)”*

2.0 ARCHITECTURAL SUMMARY

2.1 The architectural summary in response to Reason 1 / Appeal topic area a

2.1.00 The reason for refusal derives its force and meaning from the use of the word 'cumulative' at the beginning. This must mean therefore, that it is not the individual components identified that create alleged harm but their combination together. Thus it centres on the fact that the reason alleges to fail to 'respect' 'and' (the 'and' noting it is these combined) fails to make a 'positive' contribution to the 'street scenes', and 'character' of the area.

2.1.01 The reason for this is argued to be due to its 'excessive height, bulk, mass' (density being a factor of those 3 not a 'reason') and 'design'.

2.1.02 It follows that if the design 'respects' and makes a 'positive contribution' to either **one or both** of the 'street scenes' and the 'character' then those reasons fall away.

2.1.03 I will demonstrate that the Proposal does not have 'excessive' height, bulk or mass, (excessive being the key word here, as height, bulk and mass are simply characteristics of a scheme) then these same conclusions cannot be drawn.

2.1.04 'Excessive' would need to be shown to be so in relation to the existing site character and its new character, its locality, the importance/status of the new stadium development for the town and the regeneration redevelopment aspirations.

2.1.05 In terms of addressing the 'Street scenes' there are only two small stretches of 'Street scene' adjoining the site, Kingfield Road and Westfield Avenue.

2.1.06 In my opinion, Woking Borough Council's (WBC) case alleges that the scheme is only excessive and not respectful when seen along those street scenes, and thus no harm in respect of scale is an issue within the site.

2.1.07 The allegation is that the proposal fails to respect or make a positive contribution to the character of the area. Positive contribution does not mean it has to reflect the character – just respect it or make a positive contribution (or perhaps consider more appropriately that the test should be to 'not harm').

2.1.08 So is the reason for refusal (RFR) saying that this new scheme on such a large site should only respect the immediate character? No because if the site is large enough to create its own character (as historically it has), as identified in the Committee Report para 96 [CD3.1], the site can have its own character, which will then only needs to respect the character it adjoins. Otherwise there would never be other development that brings housing to a brownfield site, in any meaningful way because, otherwise you would simply be replacing what is there as more of the same.

2.1.09 'Respect' doesn't mean 'match' and respect doesn't mean you cannot be more substantial in architecture where it is less sensitive. It is a characteristic of Woking that diversity of style and scale (including very tall buildings) are common in the Town and quite rightly why shouldn't diversity of character add quality and interest otherwise our Towns would be quite dull.

2.1.10 I propose to argue that the street scenes are respectful and do not cause harm and indeed I can identify the proposals do make a positive contribution, and that the design is in character, and not excessive, in Woking as a town and in its locality, and its character meets the regeneration aims for the site and relevant planning policies and guidance.

2.1.11 I will also argue that the design is high quality, supported by an independent review panel (CD4.17), and is appropriate for its location. For this reason the councils inclusion of design as part of the cumulative RFR not only makes no sense because as explained above the aspects of the proposal that are criticised (height, bulk, mass density) are all acceptable and significantly the design itself has been objectively reviewed and supported.



FIGURE 1: View of entrance to site from Kingfield Avenue looking South. Large trees, cluttered buildings, skyline dominated by large stand, large structures adjacent domestic homes'



FIGURE 2: View of Hazel House looking East along Kingfield Road. 'Low domestic properties sit adjoining modern 5 storey apartments'

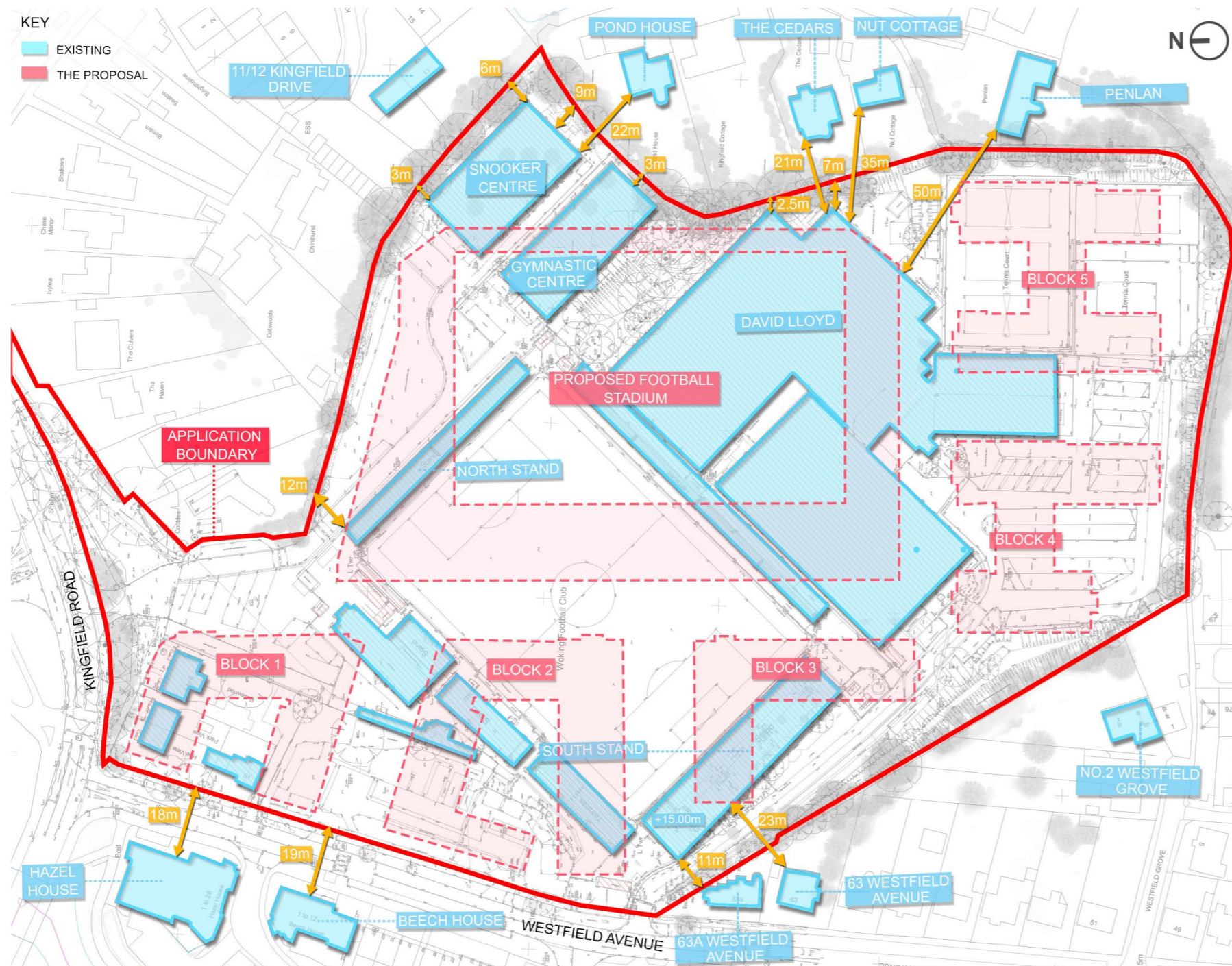


FIGURE 3: View down Westfield Avenue looking South. Poor frontage, adhoc buildings, site dominated by large existing stand, no animation or street activity'

2.0 ARCHITECTURAL SUMMARY

2.1 The architectural summary in response to Reason 1 / Appeal topic area a

2.1.12 The suggestion of 'excessive' would need to identify that excessive mass and footprint is being proposed on the site. Taking aside my view that such a large site can accommodate scale, and indeed the current site has large footprint buildings, as can be seen from the overlay below which compares existing with new, the actual new build form (red dotted) in footprint terms is quite modest and wholly proportionate to the current site footprints (in blue). These new footprints can also be seen to be articulated, and broken, not one single mass, and in improved positions in relation to surrounding buildings. The development is more of a redistribution of site coverage as opposed to a material increase of site coverage. Therefore, it is incorrect to describe the development as excessive.



Existing 26% coverage of Site

Proposed 36% coverage of Site

FIGURE 4: Relationship of existing and proposed buildings to boundaries

2.0 ARCHITECTURAL SUMMARY

2.2 Architectural summary in response to Reason for Refusal 3 / Appeal topic area c.

2.2.00 The reason for refusal suggests the scheme poses significantly harmful impacts on a handful of selected adjacent properties see below. My evidence will demonstrate that these 4 properties identified in red on the plan below (Fig 5) **do not** suffer from significantly harmful impacts of loss of privacy or overlooking, and that these properties are largely unaffected by the proposals.

2.2.01 The 3 properties identified under this condition as having daylighting impacts will be addressed by the separate evidence of Mr Dunford. However it is worth noting that two of these (Hazel and Beech House) are already opposite large apartment blocks that overlook the external highways, and as such could expect new development to occur in proximity to them. This is what planning and reusing brownfield land is for, and this is one of those windfall sites where more housing can be provided than simply would be the case where existing dwelling are replaced on a like for like basis. Further there is the added planning benefits of the new football stadium and relocated David Lloyd.



Properties and Alleged reasons for refusal

THE CEDARS	'Alleged Loss of Privacy'
NUT COTTAGE	'Alleged Loss of Privacy'
PENLAN	'Alleged Loss of Privacy' 'Alleged Overbearing Effect'
NO.2 WESTFIELD GROVE	'Alleged Loss of Privacy' 'Alleged Overbearing Effect'
BEECH HOUSE	'Alleged Loss of Daylight'
HAZEL HOUSE	'Alleged Loss of Daylight'
ELM VIEW	'Alleged Loss of Daylight'

FIGURE 5: Key plan



3.0 Architectural Proof in response to Refusal Reason no 1/ Topic Area A.

3.0 ARCHITECTURAL PROOF

3.1 Satisfying Woking's Core Strategy & Relevant Design Guidance

3.1.00 Policies CS21 (Design) and CS24 (Landscape & Townscape) of the Core Strategy (CD4.1) are the principal development plan considerations. I refer to the Design SPD (2015) (CD4.13) which I consider to be a material consideration.

3.1.01 Page 11 of the SPD sets out that the vision for the town and reflects the 13 objectives of the Core Strategy, of which the Proposal satisfies all 5 set out relevant to design. There is in fact little that the scheme does not satisfy. However, the key points that I believe we can be tested against that relate to the reasons for refusal are as follows;

3.1.02 Para 3 – 'New development in the Borough will be well designed to respect the character of the area' – I set out our understanding of character in section 3.2 and how we respect that quite diverse character of the site.

3.1.03 Para 5 – 'Development will be of high quality and high density to create an attractive environment for people to live' – this is extracted from an element relating to the Town Centre, however, the site is not a traditional residential site (as indicated by the Woking Evolution and Urban Character Review on pages 18/19 and Guidance on pages 42/43 of the Design SPD (2015) (CD4.13). The site is in the 'other' category, an undefined character, and the guidance states it is in the category similar to the Town Centre, West Byfleet and Other Smaller Suburban Centres. Yes it has residential around it, but the character is not simply to put residential back that meets the scale of the surroundings – that would be out of character with what's there now.

An Aerial View of The Site Shows The Diversity of Character, Variation In Scale, Close and Distant Proximity of Adjacent Residential and Proximity to the Town Centre



FIGURE 6: Character of the area

3.0 ARCHITECTURAL PROOF

3.1 Satisfying Woking's Core Strategy & Relevant Design Guidance

3.1.04 The site character I believe allows for an opportunity to do (at a much smaller scale than the town centre) a greater density scheme relative to the surrounding areas. Indeed, the Design SPD (2015) (CD4.13) on page 43 (below) specifically identifies the site as in the 'other' category, with an undefined character. This in my judgement is similar to being appropriate for 'Medium to high density mixed use development' as is indicated for West Byfleet and other smaller suburban centres and also shown in the grey 'other' category. The Proposal is full square behind this objective.

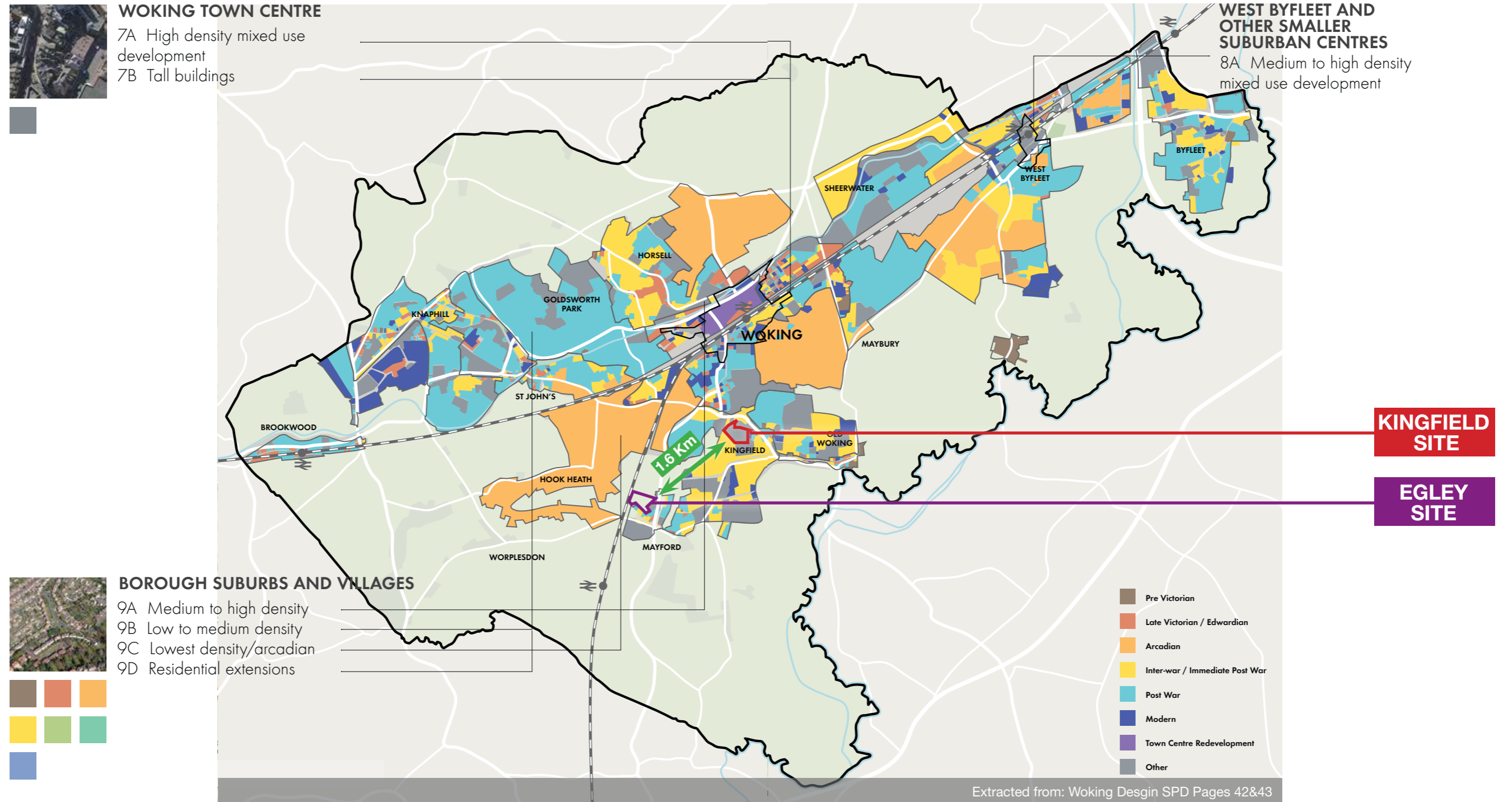


FIGURE 7: Map of Woking

3.0 ARCHITECTURAL PROOF

3.1 Satisfying Woking's Core Strategy & Relevant Design Guidance

3.1.05 Para 7 'This will be in sustainable locations and at densities that maximise the efficient use of urban land without compromising the distinctive character of the local area' – we meet the requirement of a sustainable location and are maximising the efficiency of the site through an analysis and respecting the boundaries but developing that contrast in scale (a characteristic of the site now) within the site itself.

A selection of photos looking directly towards the site and adjacent Westfield Avenue with my comments



FIGURE 8: View of entrance to the site coming from Woking Park, looking South



FIGURE 9: View of South Stand from Westfield Avenue



FIGURE 10: View on Westfield Avenue, looking South opposite South Stand



FIGURE 11: View from Westfield Grove looking down Westfield Avenue to the North and the Town Centre



FIGURE 12: View down Westfield Avenue looking North opposite Westfield Grove towards Town Centre

3.0 ARCHITECTURAL PROOF

3.1 Satisfying Woking's Core Strategy & Relevant Design Guidance

3.1.06 Para 9 'To encourage the high quality design of buildings, neighbourhoods and the public realm that creates a sense of place where people feel safe to spend time and interact without fear of crime' – this is not part of the reasons for refusal but is relevant for me to raise, as the scale and design of the Proposal allows for a new comprehensive neighbourhood, with high quality design (recognised by officers and the DSE panel) with a significant proportion of the Proposal given over to public and private realm. The overall site creates 2.7 hectares (6.6 acres) of public realm and shared amenity space and in relation to the residential in isolation provides 63% of the footprint of the residential as public realm space. Even the roofs are given over to green or amenity space (excluded from this calculation). In addition, 7,864 sqm of private amenity space is provided in the form of roof terraces or balconies.

3.1.07 If you refer to the diagram below this identifies, the space given over to Residential, Stadium and Public realm.



FIGURE 13: Percentage of street/amenity space



FIGURE 14: New proposed Public Realm Street



FIGURE 15: Roof top Amenity Space and New Public Realm highlighted

3.0 ARCHITECTURAL PROOF

3.1 Satisfying Woking's Core Strategy & Relevant Design Guidance

3.1.08 I consider Policy CS24 to be relevant insofar as the Proposal should respect the existing townscape character at its edges and on the existing streetscene where relevant (parts of Westfield Avenue for example), and also generate a positive landscape/ townscape in itself. The Design SPD (2015) (CD4.13) is clear (pages 18/19) that the surrounding context (not the context/ character of the site) is largely Inter-war/ Immediate Post War, or Post War in character. Directly opposite, to the west, is the Willow Reach development, which is of medium density, and of new modern design. There is nothing historic around the site, and no Listed Buildings or Conservation Areas which would be affected by the Proposal.



FIGURE 16: View looking from Westfield Avenue outside the site, towards the North



FIGURE 17: View into Kingfield Close looking to the West



FIGURE 18: View of Acer Grove from Westfield Avenue looking North



FIGURE 19: View Down Acer Grove from Westfield Avenue, looking West

3.0 ARCHITECTURAL PROOF

3.2 Impacts on Character, and Context Created – Respect and Excess

3.2.1 Reasons For Redevelopment – New Character

3.2.1.00 When assessing the appropriateness of this scheme, and whether it respects and makes a positive contribution to the street scenes and character of the area, its important to understand the design brief or drive for redevelopment of the site.

3.2.1.01 The redevelopment was to create a new permanent purpose-built home for the football club (a destination like no other) that would cater for its future growth, the strategic ‘vision’ for the Town, the creation of new residential homes and to enable the delivery of the community benefits that combined approach brings.

3.2.1.02 Hence this development was not about simply respecting the character of the surroundings (which it does), it was about reinventing the character of the site, that created a modern community based football ground, with new local needs uses, but also complemented by high quality residential use, rather than the current ‘mish mash’ of industrial style buildings that adjoin boundaries. The Committee Report (CD 3.1) para 96 reinforces this. In addition, and importantly, this furthers the aims of the NPPF as especially as regards housing provision and making the best use of previously developed land.

3.2.1.03 The mix of uses will better allow it to knit into its context, with new residential or football stands, meeting existing residential at the edges. This is a comprehensive development scheme, it is regeneration, in line with Core Strategy and the NPPF as the Proof of Mr Collins outlines.

3.2.1.04 Very few cities, let alone towns, accommodate more than one football stadium and the Proposal seeks the largest football stadium in Surrey, so this is a once in a generation opportunity to mark a new Stadium site with its own character and clearly that cannot be achieved by a few new houses.

3.2.1.05 The development is about destination sense of place activity and safety drama and excitement calm space and exciting space. A football stadium is not a ‘standard’ residential scheme. It has bustle with massive activity on match days quiet on others and a different environment alongside the stadium to that of a normal street. A new scheme needs to respond to that which is different in character to a ‘conventional’ residential street.

3.2.1.06 The proposal is reinventing the industrial style random placement of buildings, with a new character for the site, that is complimentary in its use to the surrounding residential, and respects the edges where we adjoin different aspects.

3.2.1.07 All of these design drivers are in accordance with the Design SPD (2015) (CD4.13).

3.2.1.08 The approach to a comprehensive stadium design with complementary residential development is not out of the ordinary, for example similar proposals for Brentford FC (Figure 20) and Wimbledon FC (Figure 21)



FIGURE 20: Brentford FC aerial view



FIGURE 21: Wimbledon FC aerial view

3.0 ARCHITECTURAL PROOF

3.2 Impacts on Character, and Context Created – Respect and Excess

3.2.2 Existing Site Contrasts

3.2.2.00 The existing site character is also about 'contrast'.

3.2.2.01 Both contrast between industrial and residential in style.

3.2.2.02 Contrast in scale – at present, bungalows sit close aside a 5 storeys stand which is 5 times taller than context. In other locations industrial large footprint buildings sit alongside boundaries, but screened by mature trees.

3.2.2.03 The clear presence in the 'streetscene' is very obvious. It is next to the edges and very close to the many boundaries (see figures 22 and 23 below).



FIGURE 22: South Stand comparison to Westfield Properties aerial view



FIGURE 23: South Stand comparison to Westfield Properties street view

3.0 ARCHITECTURAL PROOF

3.2 Impacts on Character and Context Created – Respect and Excess

3.2.2 Existing Site Contrasts

3.2.2.04 That diversity is part of the already established character and contrast of the site and locality. I stress that the Proposal does not attempt to replicate that, but just to draw attention to this aspect of the diversity of character of this site.

3.2.2.05 I consider that the Proposal represents an enhancement to its edges in this location and hence a positive contribution to the streetscene. The existing larger scale contrast is located adjacent to the external streets – that character of contrast of scale and language could not be more visible as a characteristic of the site.

3.2.2.06 Hence part of the language of the site, its character, is to have contrast between residential and current uses. Indeed, contrast is inevitable on the edges of medium to high density character areas with the rest of the town. This is fully consistent with the approach the Design SPD (2015) (CD4.13) takes regarding the character for this site, alongside other locations such as the Town Centre and West Byfleet.



Extracted from: Woking Football Club_ES_Vol2_TVIA_Updated. Page 28

FIGURE 24: Contextual view looking towards the site from Westfield Avenue

3.0 ARCHITECTURAL PROOF

3.2 Impacts on Character and Context Created – Respect and Excess

3.2.2 Sequential Approach to the Site - its Character and Contrast

3.2.2.07 The contrasts and character are very clear on approaching the site. The views approaching from Westfield Avenue, despite running past lines of bungalows each side of the street, herald larger scale and a change in character as you approach the site. The photos below show the significance as the south stand appears, then does the apartments and in the distance 30 storey towers.



FIGURE 25: View looking North down Westfield Avenue towards Town Centre



FIGURE 26: View looking North down Westfield Avenue towards South Stand



FIGURE 27: View looking East on Westfield Avenue towards South Stand



FIGURE 28: Contextual view looking West towards Acer Grove

3.2.2.08 If you continue on this road, take a left on Kingfield, then right on Claremont Avenue (one way main site approach coming out of the Town centre) there is a 10 storey apartment building, nestling amongst 2 storey homes, marking the view looking north.



FIGURE 29: Contextual view looking North down Claremont Avenue



FIGURE 30: View looking North down Claremont Avenue towards 'Craigmore' apartment building

EXISTING 10 STOREY APARTMENTS 'CRAIGMORE TOWER' SITS WITHIN DOMESTIC PROPERTIES, AND LANDSCAPE, 462m FROM SITE

3.2.2.09 As can be seen variety and contrast in scale are characteristic of the locality, as well as the Town.

3.0 ARCHITECTURAL PROOF

3.2 Impacts on Character and Context Created – Respect and Excess

3.2.2 Sequential Approach to the Site - its Character and Contrast

3.2.2.10 Turn back and look towards the site and you see elevated 5 storey apartments with a large roofed bungalow in front.



FIGURE 31: View from Kingfield Road looking East towards Hazel House

3.2.2.12 However turn around and look north and you see towers in the town centre.



FIGURE 33: View from Hoe Stream looking North towards the Town Centre

3.2.2.11 Coming from the Town Centre, across the park, we are met by the stands sitting in the background, large trees and two to three storey homes.



FIGURE 32: View from Hoe Stream looking South towards the entrance to site

3.2.2.13 It cannot be argued this site is pure low rise residential. It is diverse, sometimes brutal, sometimes soft, but contrast and scale are no stranger to the character.

3.0 ARCHITECTURAL PROOF

3.2 Impacts on Character and Context Created – Respect and Excess

3.2.3 Wider Town Centre character

3.2.3.00 With regards to the ‘respect’ the design pays to its neighbours I have looked at both the local character of immediate neighbours as well as the wider character of Woking as a town. These combined with the new vision for character should be what the scheme is assessed against.

3.2.3.01 You cannot deliver a strategic asset for a town, and only look at its relevance on local character. It has to be assessed in part, in the context of the town as a whole.

3.2.3.02 Woking as town centre has a character of very tall buildings next to low buildings. Yes the really tall buildings (30 Storeys) are in the Town Centre, however the Town has embraced the idea that scale and its contrast is not a problem, and where better than a new landmark site for a use that is likely to only be accommodated in one location, to celebrate a modest increase in scale. Indeed the council’s Design SPD (2015) (CD4.13), when illustrating their ‘approach’ uses the image in page 12, extracted as fig 34 and 35 below, to set the scene.

3.2.3.03 The Town centre has set the tone for its aspirations. As you leave/ enter the station from the south, you see layered and rising towers of between 16 to 30 storeys - see below.



Extracted from: Woking Design SPD Page 12

FIGURE 34: Woking Town Centre Image



FIGURE 35: Looking towards Woking Station from Station Approach

3.0 ARCHITECTURAL PROOF

3.2 Impacts on Character and Context Created – Respect and Excess

3.2.3 Wider Town Centre character

3.2.3.04 Leave the station and head into the Town centre (north) and you see 30 storeys sat behind 3 storey historic buildings - see below.



FIGURE 36: Looking from Woking Station on High Street

3.0 ARCHITECTURAL PROOF

3.2 Impacts on Character and Context Created – Respect and Excess

3.2.3 Wider Town Centre character

3.2.3.05 Moving towards the site and heading south where traditional domestic scale borders taller buildings, Harrington Place (7 to 12 storeys) sits in harmony with leafy Heathside Crescent (2 storey arts and craft style home). Woking character is diverse and contrasting.



FIGURE 37: Newly constructed Harrington Place approaching from East



7 STOREYS
RISING TO 12
STOREYS

FIGURE 38: Newly constructed Harrington Place looking East



FIGURE 39: Newly constructed Harrington Place looking North



FIGURE 40: Newly constructed Harrington Place looking West

3.2.3.06 The scale and character of Heathside Crescent meeting Harrington Place appear to mark what is deemed to be an acceptable scale and transition in scale, adjacent to 2 storey domestic scale. I would pose to question that if it is acceptable here, why would it not be acceptable on the Kingfield site where larger scale meets domestic scale? As I have outlined, the Design SPD (2015) (CD4.13) on page 19 identifies the character of the site as ‘Other’ – on that basis its character is clearly diverse and not locally distinctive.

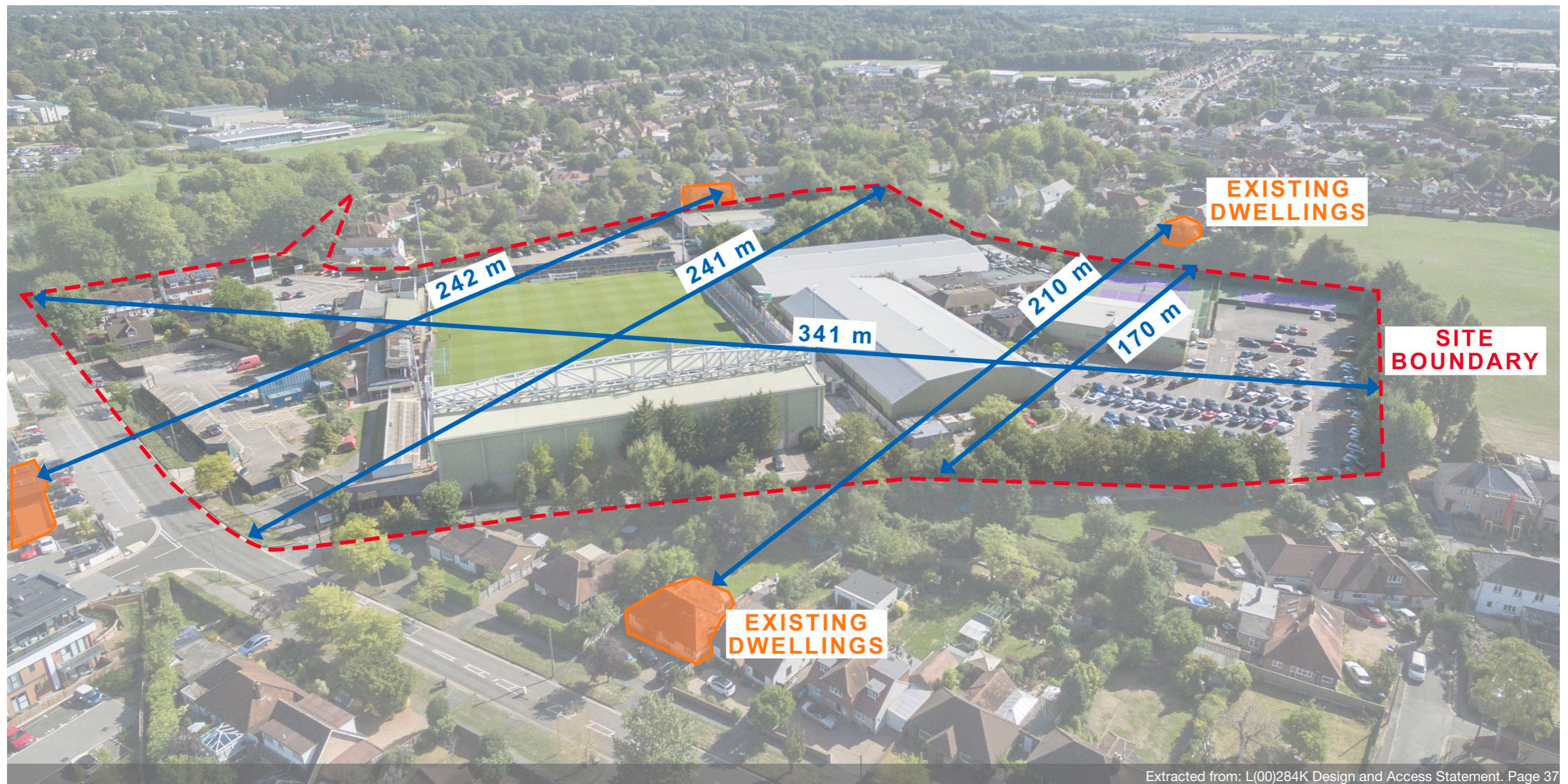
3.0 ARCHITECTURAL PROOF

3.2 Impacts on Character and Context Created – Respect and Excess

3.2.4 The site is of its own significant scale

3.2.4.00 Part of the character is related to size. I consider it is unarguable to say that the site is anything other than large, at 5 hectares (see Design and Access Statement Application Document (AD2.5) Page 37) and therefore It is already capable' of accommodating substantial buildings because of its scale.

3.2.4.01 All that is not to say that the Proposal does not respect the neighbours. The width and depth of the site allows us to deal with different scale on the boundaries where we meet neighbours, to that within the site, where the distance to neighbours has much less impact.



Extracted from: L(00)284K Design and Access Statement. Page 37

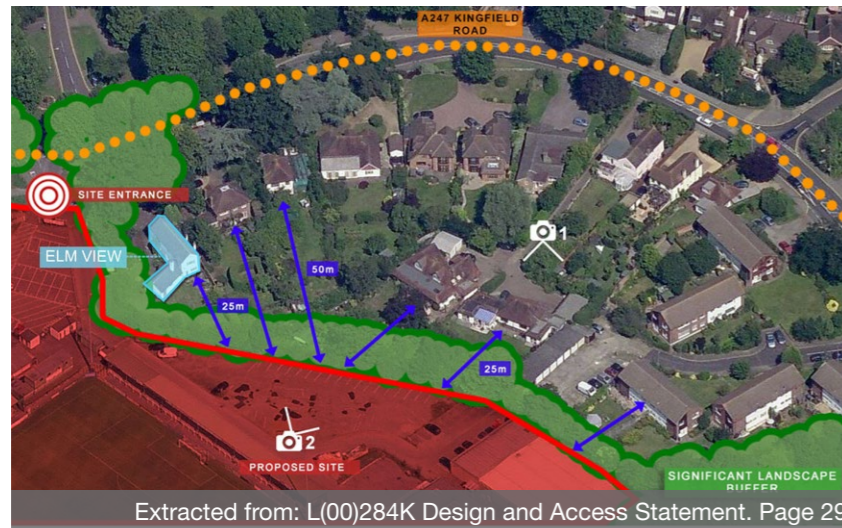
FIGURE 41: Significant Scale of Existing Site

3.0 ARCHITECTURAL PROOF

3.2 Impacts on Character and Context Created – Respect and Excess

3.2.5 Sympathetic Design & Access Statement Character review

3.2.5.00 There was a significant review of the local character around the site in the Application Document (AD2.5) along with a detailed analysis of all the sites boundaries (pages 7 to 23 and pages 26 to 33 in immediate 'edges') which identifies a range of characters around the immediate boundaries and how we have addressed these boundaries through design.



Extracted from: L(00)284K Design and Access Statement. Page 29

FIGURE 42: Proximity of Existing Site To Existing Buildings looking East



Extracted from: L(00)284K Design and Access Statement. Page 30

FIGURE 43: Proximity of Existing Site To Existing Buildings Looking North



Extracted from: L(00)284K Design and Access Statement. Page 32

FIGURE 44: Proximity of Existing Site To Existing Buildings looking West

3.2.5.01 Within the site, scale responded to and moderated away from existing neighbours. The character is 'reset' with a new 'main street' that adjoins the stadium and new residential streets which stretch and form the transition from the main street within the site, towards Westfield Avenue, and then connects with neighbours at a lower scale. The design approach is set out in the Design & Access Statement, particularly pages 42 to 51.

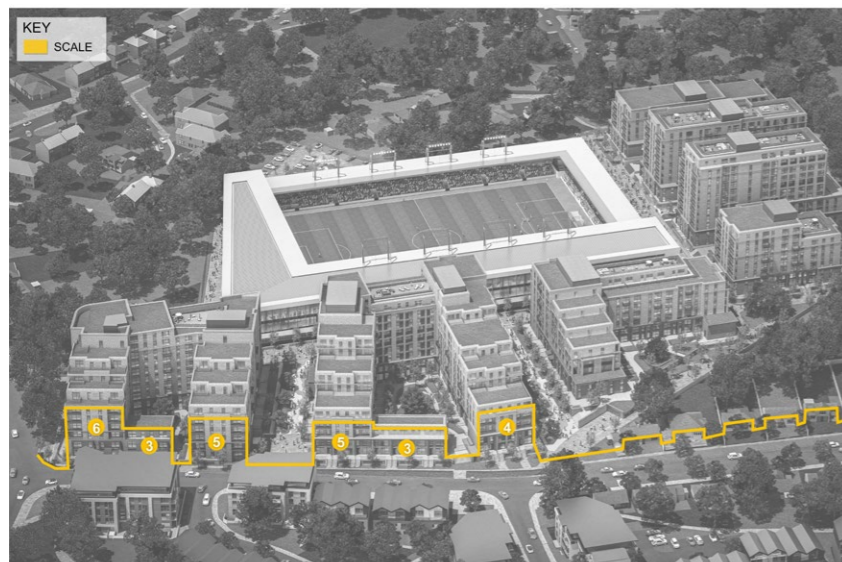


FIGURE 45: Aerial view of the Proposal looking towards Westfield Avenue, Indicating Scale of the Proposal looking towards Westfield Avenue

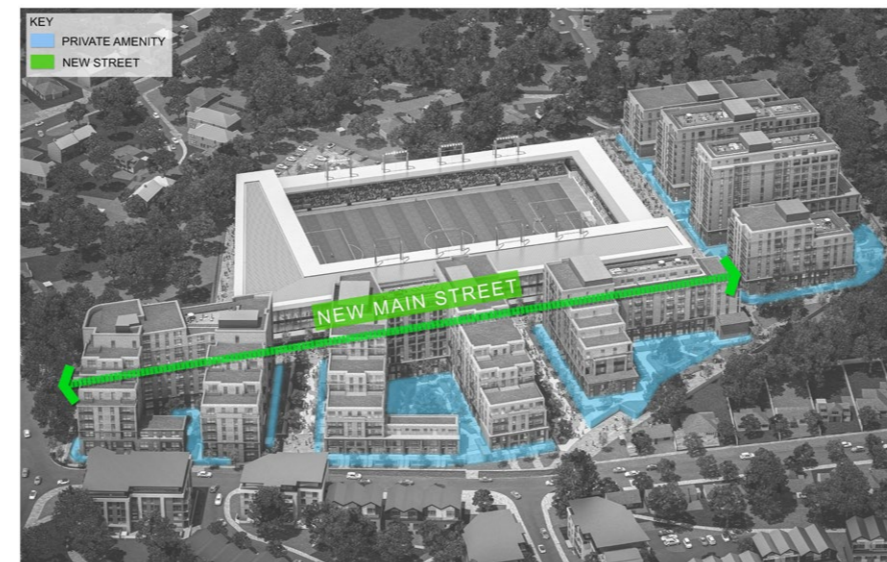


FIGURE 46: Aerial view of the Proposal looking towards Westfield Avenue, Indicating New Main Street and Private Amenity of the Proposal looking towards Westfield Avenue



FIGURE 47: Aerial view of the Proposal looking towards Westfield Avenue, Indicating Scale Along New Street of the Proposal looking towards Westfield Avenue

3.0 ARCHITECTURAL PROOF

3.2 Impacts on Character and Context Created – Respect and Excess

3.2.6 Significant Boundary Screening

3.2.6.00 A distinctive aspect of the site's character is the trees – not within the site but on the edges. The trees are extensive, very mature, very tall and very dense. These sit around most of the perimeter where we meet neighbours and mostly are being retained or enhanced. This conserves and where possible enhances the existing landscape with a positive contribution to the townscape (as required by Core Strategy policy CS24).

3.2.6.01 It must be a consideration, that these retained boundary landscaping have a significant screening/softening effect (close and longer range), but equally they have a significant shading/overbearing effect on some of the existing properties there too.



FIGURE 48: Aerial View of Existing Site Showing Dense Tree Boundary

3.0 ARCHITECTURAL PROOF

3.2 Impacts on Character and Context Created – Respect and Excess

3.2.7 Character of Streetscenes

3.2.7.00 In respect of street scenes, there are only two 'streetscenes'. An element of Westfield Avenue that already fronts larger scale apartments and the corner of Kingfield Road.

3.2.7.01 Kingfield Road is the obvious arrival point from the town centre, and also is the best point of access for vehicles, and because of the existing larger scale residential apartments to the west, there is a reason to celebrate and at the same time screen some larger scale at this point – albeit this is hidden significantly behind trees as can be seen from the TVIA (AD2.2) view prepared in winter below. This illustrates the significant screening effect on the 10 storeys new development behind winter trees (Not fully shed leaves).



Extracted from: Woking Football Club_ES_Vol2_TVIA_Updated. Page 45

FIGURE 49: CGI showing New Development Screened By Trees In Winter



FIGURE 50: Similar View to TVIA taken in March 2021 Kingfield Streetscene



FIGURE 51: Westfield Avenue Streetscene

3.0 ARCHITECTURAL PROOF

3.2 Impacts on Character and Context Created – Respect and Excess

3.2.7 Character of Streetscenes

3.2.7.02 Westfield Avenue already has 5 storey apartments stepping downwards to 4 then 3 (the Willow Reach development) and the Proposal, where it adjoins Westfield Avenue, is only 6 storeys, of narrower width, and steps downwards heading south respecting the cascading nature of the street. The streetscene below illustrates the scale of the Proposal as it meets the street.



FIGURE 52: Streetscene Elevation facing Site



FIGURE 53: Comparative Streetscene Elevation facing West (opposite) along Westfield

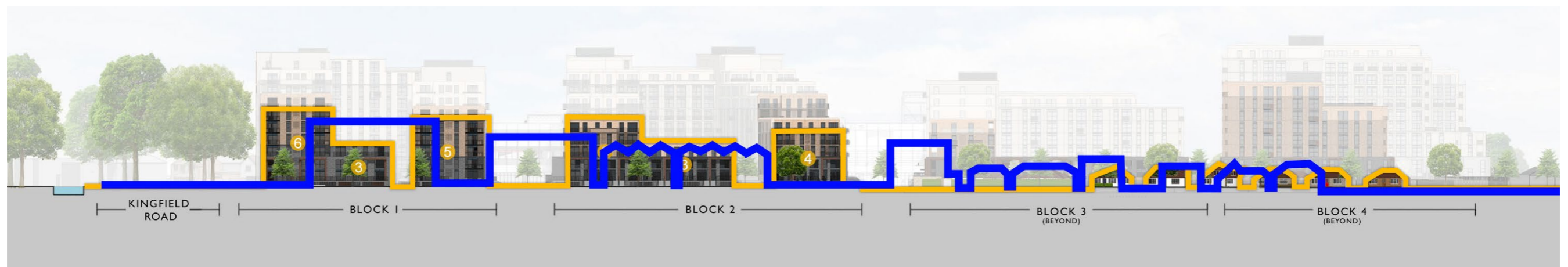


FIGURE 54: Streetscene Elevations Overlaid

3.0 ARCHITECTURAL PROOF

3.2 Impacts on Character and Context Created – Respect and Excess

3.2.7 Character of Streetscenes

3.2.7.03 It is proposed that only as one moves into the large site that the scale rises. The nature of pedestrian views along Westfield Avenue are linear looking north south and it is the development edges that meet the street, that mark the apparent character at the street edge. Not the buildings that are set well within – refer to visualisations below (see the CGI from the Design & Access Statement page 144 looking south down Westfield Avenue)

3.2.7.04 This is not excessive or disrespectful of the street, it is a positive change to the undefined existing street scene of Westfield Avenue as seen in Figures 3 and 95 in this document.



Extracted from: L(00)284K Design and Access Statement, Page 144

BENEFITS

- New streetside activity
- New landscape edge to street
- Frontages and front doors on street edge
- Layered building design
- Articulated façades
- Scale diminishes moving south

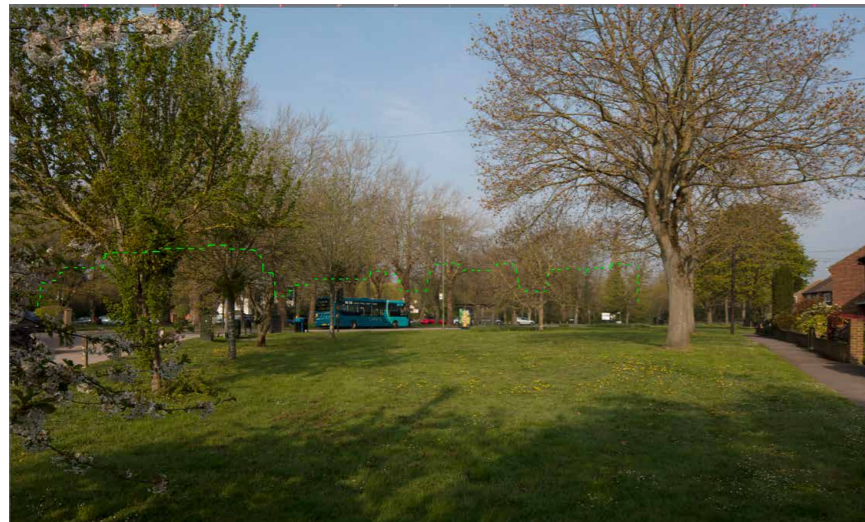
FIGURE 55: Streetscene

3.0 ARCHITECTURAL PROOF

3.3 Impact on the Streetscenes – Westfield Avenue and Kingfield Road

3.2.7.05 The two key external streets that the Proposals meet are Westfield Avenue and Kingfield Road. The buildings do not meet any other external streets. The buildings can be seen from more distant streets, but as identified in the TVIA (AD2.2) the impact on those views are screened by trees, existing buildings or level changes.

3.2.7.06 If these are the two key streets that the refusal alleges the proposals do not 'respect' or make a 'positive contribution' to, then one must look at the character of these streets and the architectural response presented.



Extracted from: Woking Football Club_ES_Vol2_TVIA_Updated. Page 47

FIGURE 56: View looking West over Kingfield Green showing impact of Proposal



Extracted from: Woking Football Club_ES_Vol2_TVIA_Updated. Page 57

FIGURE 57: View looking South from Brooklyn Road showing impact of Proposal



Extracted from: Woking Football Club_ES_Vol2_TVIA_Updated. Page 60

FIGURE 58: View looking East from Hawthorn Road showing impact of Proposal

3.0 ARCHITECTURAL PROOF

3.3 Impact on the Streetscenes – Westfield Avenue and Kingfield Road

3.3.1 Westfield Avenue

3.3.1.00 The following diagrams illustrate how the proposals respond to the main criticisms of the scheme, starting with 'Scale', then 'Massing', then 'Design', then 'Bulk'.

3.3.1.01 Scale: Height of development adjoining street is 6 to 3 storeys, scale opposite is 5 to 3 storeys.

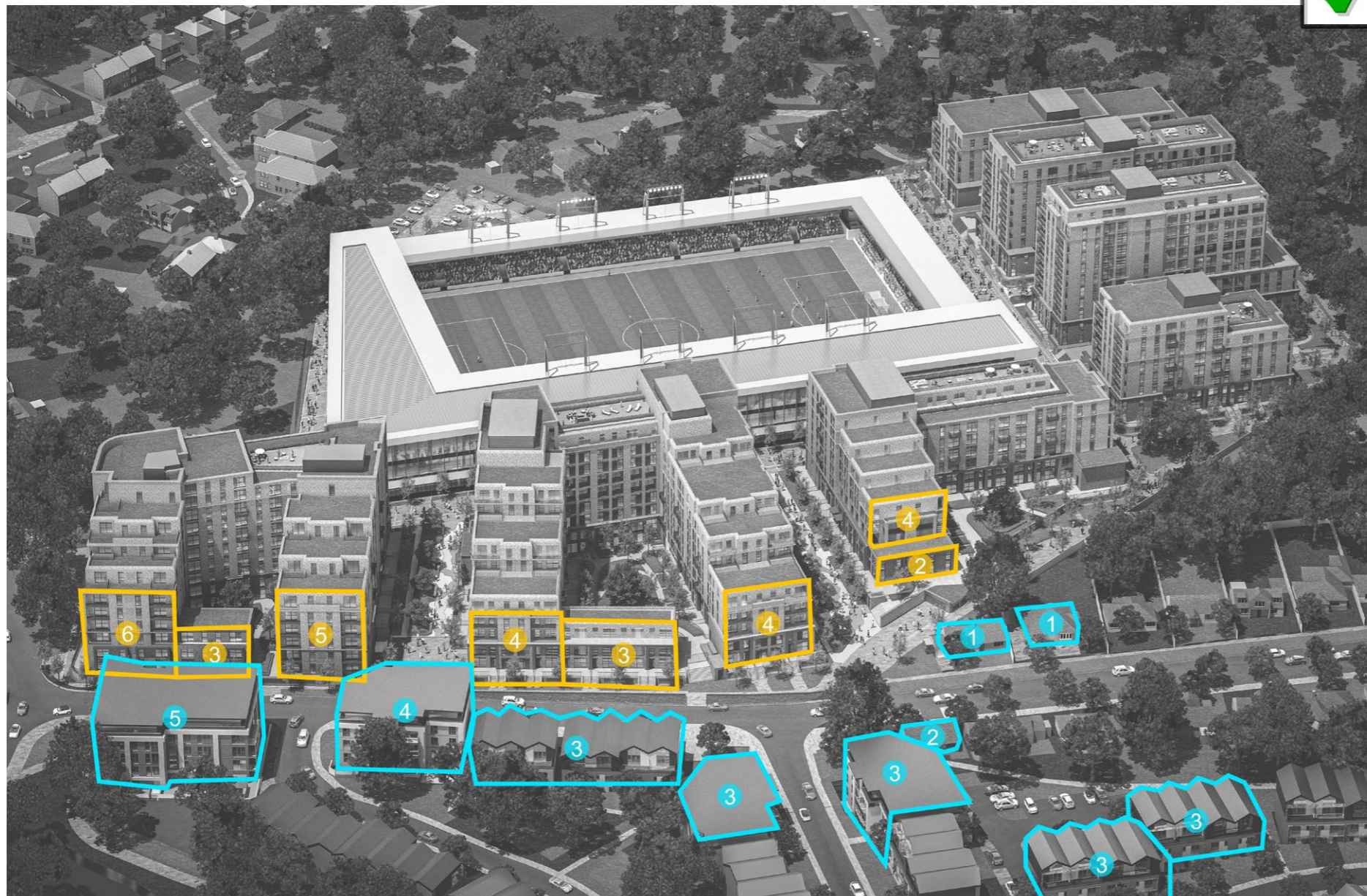


FIGURE 59: Aerial view of the Proposal, indicating the scale along Westfield Avenue immediately adjoining the Street

3.0 ARCHITECTURAL PROOF

3.3 Impact on the Streetscenes – Westfield Avenue and Kingfield Road

3.3.1 Westfield Avenue

3.3.1.02 Massing: Building blocks of over 3 storeys that meet the street are narrower than the buildings already on the streets.

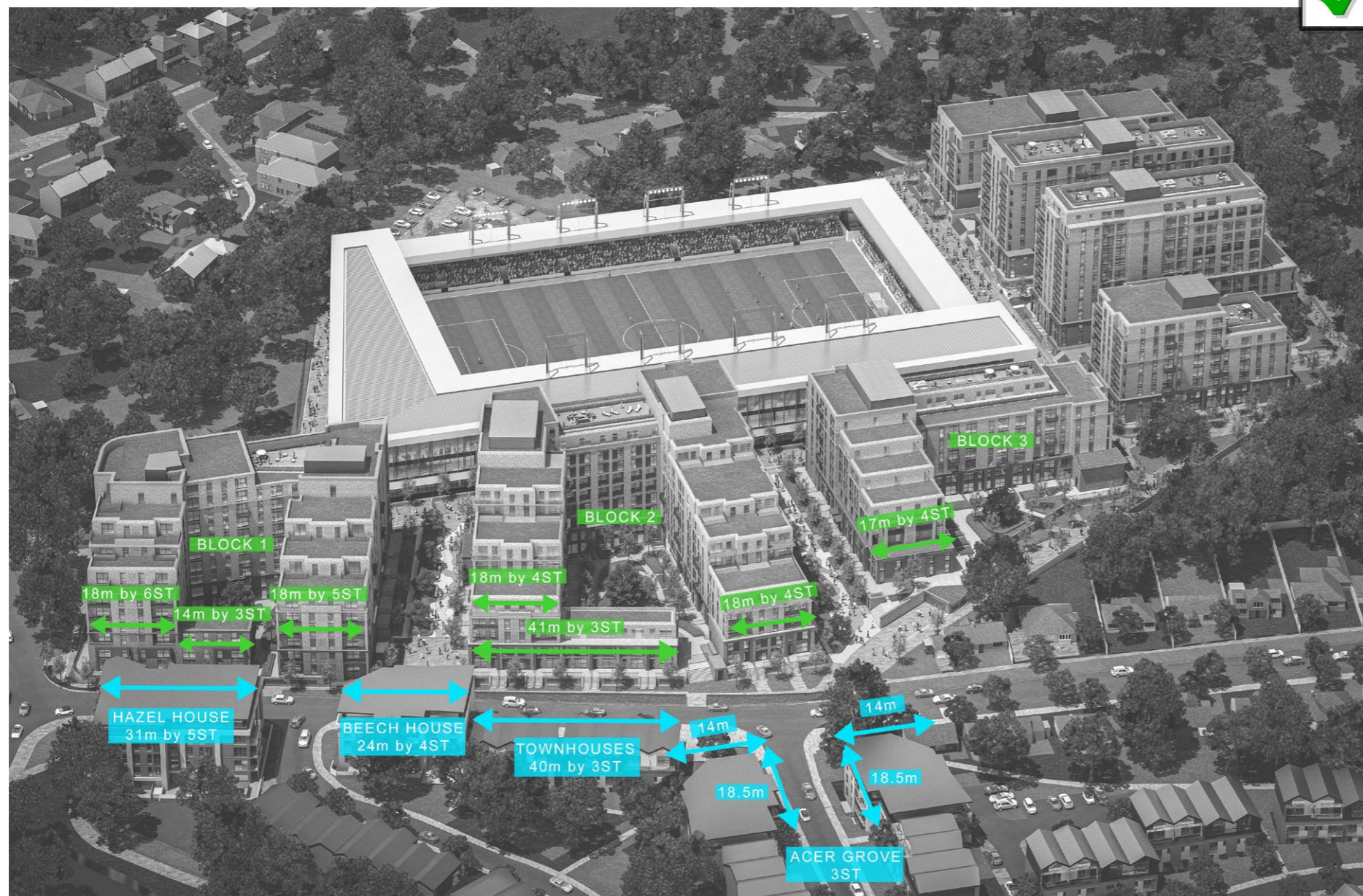


FIGURE 60: Aerial view of the Proposal, indicating the massing along Westfield Avenue immediately adjoining the Street

3.0 ARCHITECTURAL PROOF

3.3 Impact on the Streetscenes – Westfield Avenue and Kingfield Road

3.3.1 Westfield Avenue

3.3.1.03 Design: Buildings are in brick, with large glazed openings, and with setback upper floors, with balconies and terraces, high quality design – complementing buildings opposite and creating new character.

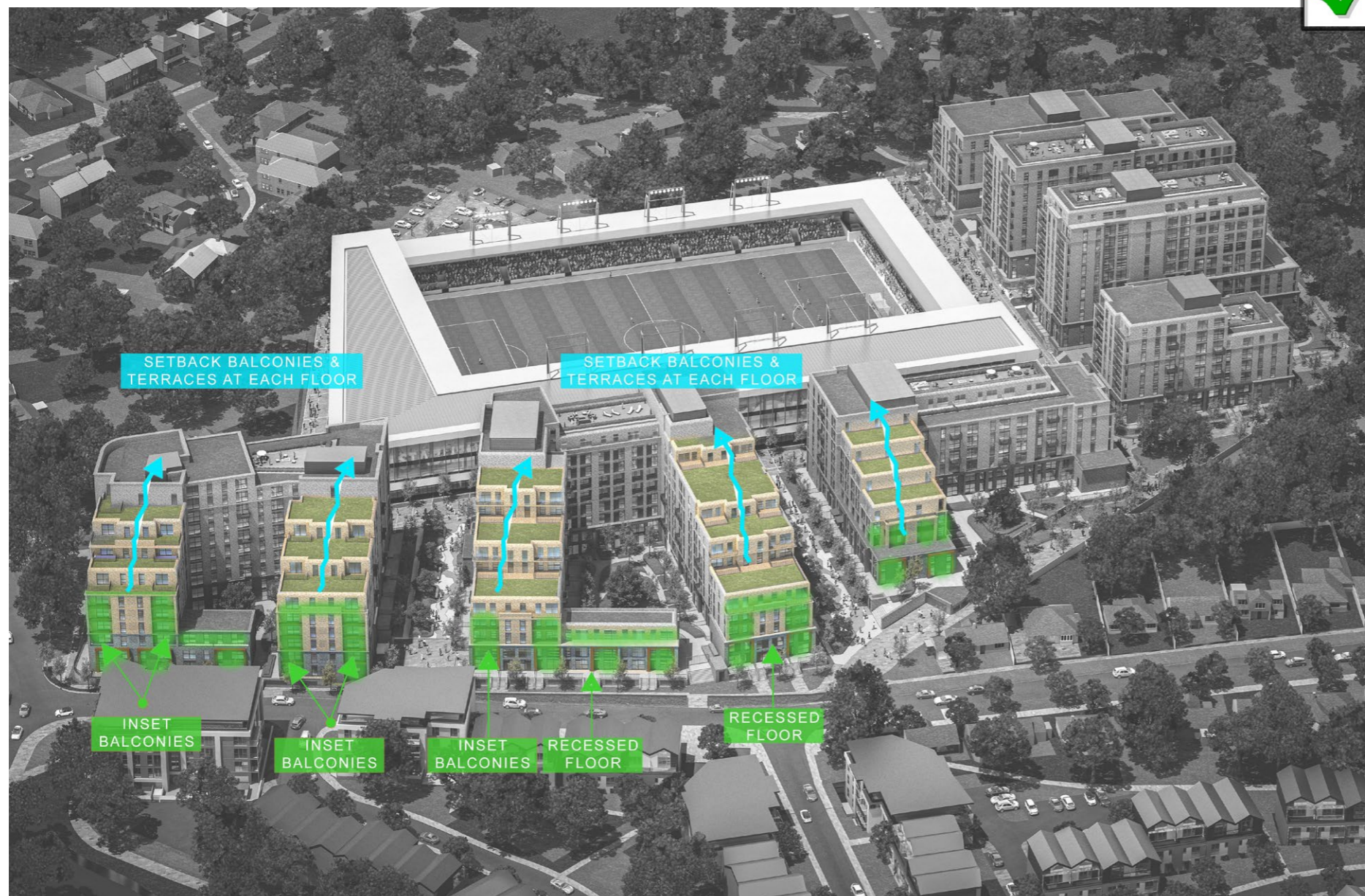


FIGURE 61: Aerial view of the Proposal, indicating the design along Westfield Avenue immediately adjoining the Street

3.0 ARCHITECTURAL PROOF

3.3 Impact on the Streetscenes – Westfield Avenue and Kingfield Road

3.3.1 Westfield Avenue

3.3.1.04 Bulk: Do any of the larger (height) elements of the proposed buildings meet the street? Do the buildings form a continuous street block out of character? No they do not. Figure 4 page 10, Fig 52 Page 30 and figure 68 from page 40, further reinforce this.

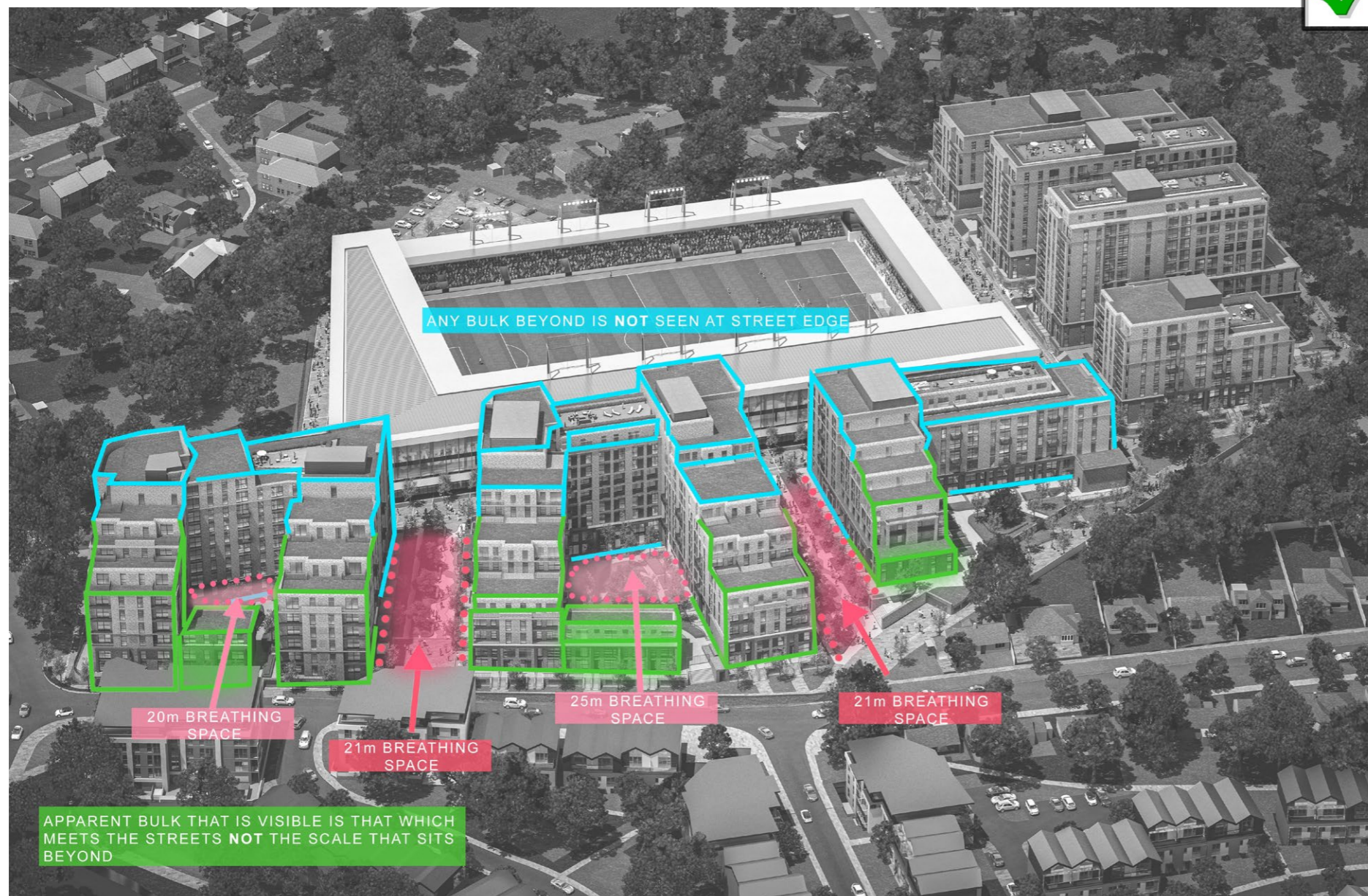


FIGURE 62: Aerial view of the Proposal, indicating the bulk along Westfield Avenue immediately adjoining the Street

3.0 ARCHITECTURAL PROOF

3.3 Impact on the Streetscenes – Westfield Avenue and Kingfield Road

3.3.1 Westfield Avenue

3.3.1.05 Positive Contribution: Creates new active frontage, animates the street, respects scale and materials and rhythm, creates new landscape.

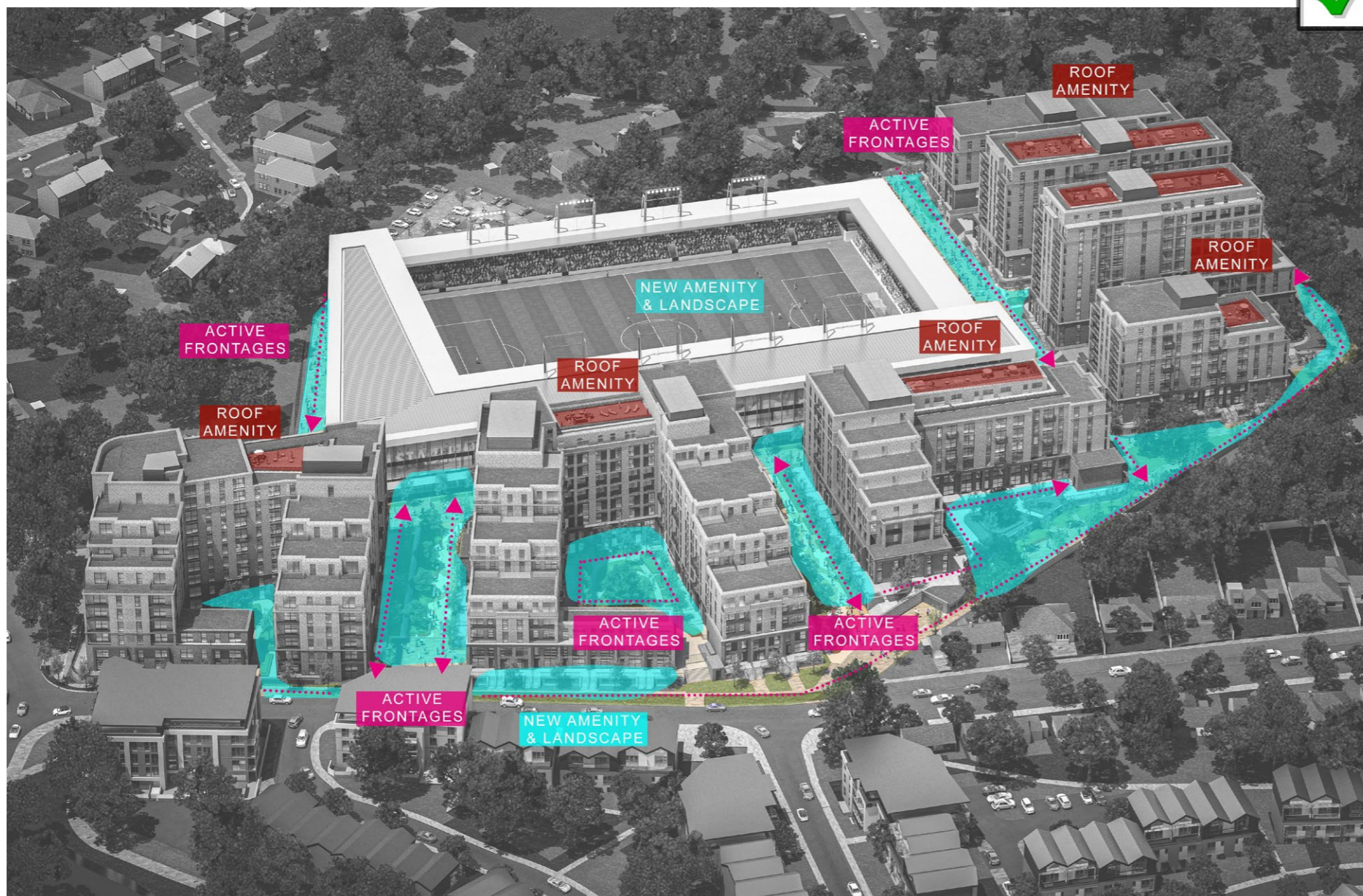


FIGURE 63: Aerial view of the Proposal, indicating the positive contribution along Westfield Avenue immediately adjoining the Street

3.3.1.06 Conclusion: The Proposals respect the character and scale and design of Westfield Avenue as set out in the previous slides. This accords with Core Strategy policies CS21 and CS24.

3.0 ARCHITECTURAL PROOF

3.3 Impact on the Streetscenes – Westfield Avenue and Kingfield Road

3.3.2 Kingfield Road

3.3.2.00 Kingfield Road frontage is a particularly interesting edge architecturally, where the site meets the outside streets. This is because it does not appear to have a themed design. Instead as often happens over time it has evolved in an adhoc manner. This means that architecturally it lacks both cohesion and any single identifying theme which could be described as an overriding characteristic.

3.3.2.01 The small section of Kingfield Road that is met by the scheme, is already a key entry to the football club. It is the direct link across to Woking Park and onto the Town Centre. It is significantly screened by trees and it has as its neighbour to the west a modern five storey apartment block and a domestic dwelling to the east. It has already had its character altered by the entrance to the stadium as well as the football stand itself behind.



FIGURE 64: View looking South from Hoe Stream towards Site Entrance

FIGURE 65: View looking North down Westfield Avenue to Town Centre

FIGURE 66: View looking East from Kingfield Road towards Hazel House

3.3.2.02 There cannot be an argument that any new scheme would keep the current configuration and that is the most obvious location for an entrance and gateway to the site. That accepted it is then a matter of the gateway and its impact.

3.3.2.03 The considerations in relation to the Kingfield frontage set against the reasons for refusal (cumulatively excessive scale, massing, design and bulk) are set out on the following pages.

3.0 ARCHITECTURAL PROOF

3.3 Impact on the Streetscenes – Westfield Avenue and Kingfield Road

3.3.2 Kingfield Road

3.3.2.04 The following diagrams illustrate how the proposals respond to the main criticisms of the scheme, starting with ‘Scale’, then ‘Massing’, then ‘Design’, then ‘Bulk’.

3.3.2.05 Scale: There are 5 storeys to the West and 2/3 storeys to the East. Open aspect to the North/Town Centre. Major road on boundary, site screened by trees, arrival gateway to club, and re-development. It’s a very mixed character already. Can we put a larger building here that drops to respect the boundaries or is sufficient distance from adjacent properties? Yes this is entirely appropriate and was done with significant separation and a complimentary buffer building ‘the concierge’ adjacent to the existing dwelling.

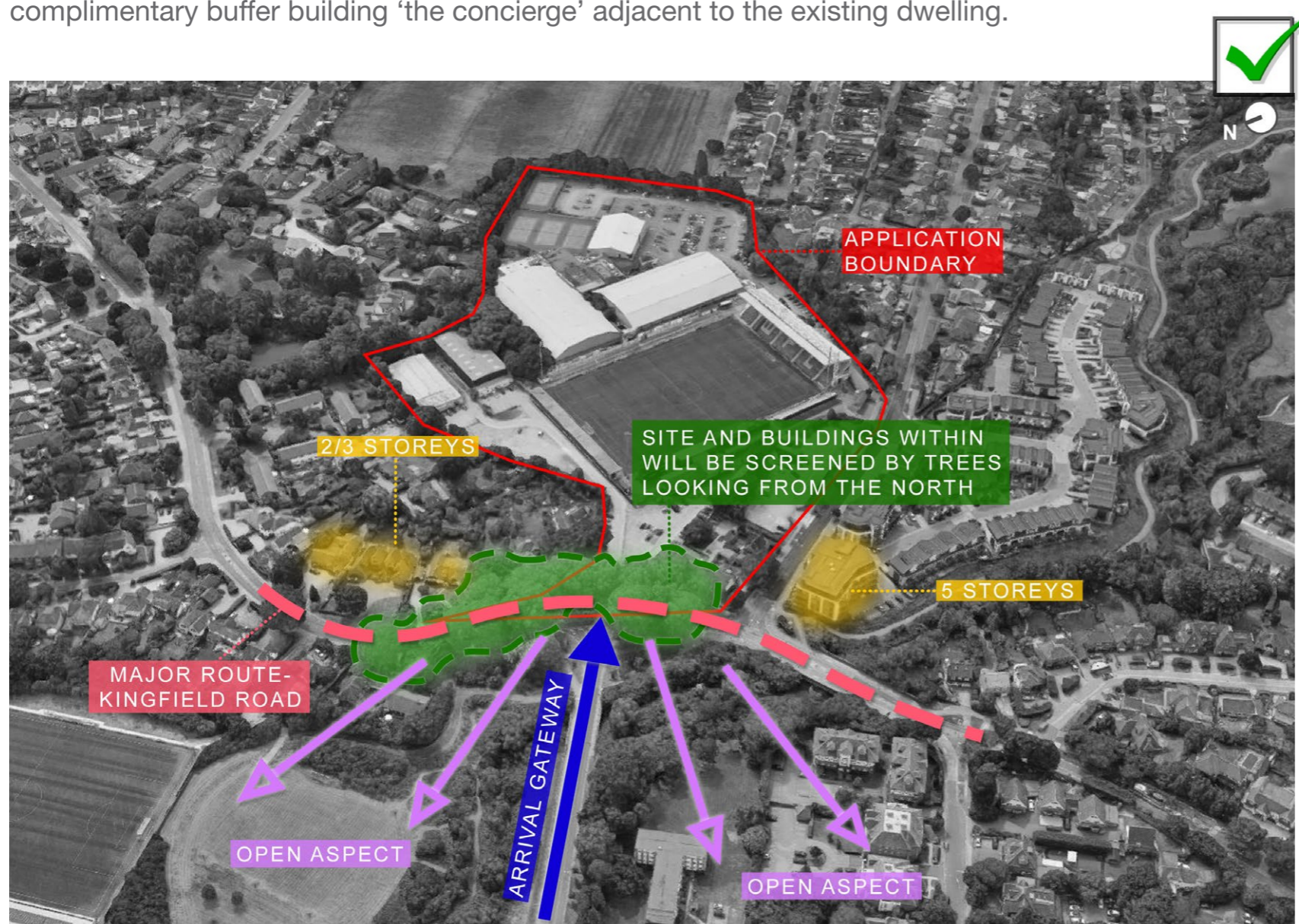


FIGURE 67: Aerial Map scale analysis

3.0 ARCHITECTURAL PROOF

3.3 Impact on the Streetscenes – Westfield Avenue and Kingfield Road

3.3.2 Kingfield Road

3.3.2.06 Massing: The majority of any built form here is screened by mature trees. How wide is the built form that fronts the street? The building width that is visible from Kingfield is the same frontage width as that of Hazel House hence the scale of blocks is sympathetic with neighbouring apartments and visually relates to that building.

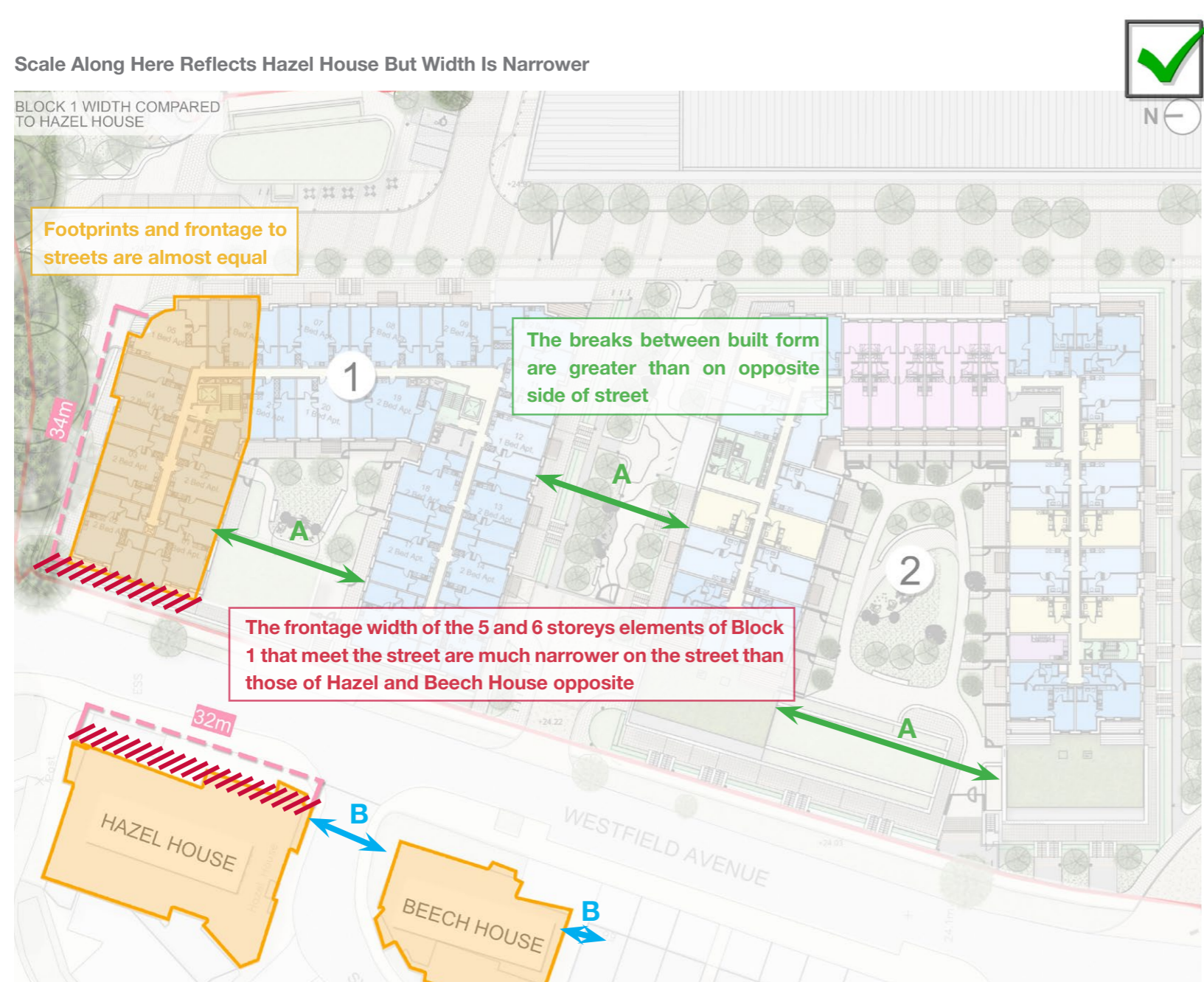


FIGURE 68: Frontage width comparison



FIGURE 69: Kingfield Road Entrance showing Mature Trees

3.0 ARCHITECTURAL PROOF

3.3 Impact on the Streetscenes – Westfield Avenue and Kingfield Road

3.3.2 Kingfield Road

3.3.2.07 Design: The buildings are in brick with large glazed openings and with setback upper floors of a high quality design that complements the buildings opposite and creates a new character. Curved edge softens arrival and draw people into the site. The ground floor is animated with externally facing entrances.



FIGURE 70: CGI showing New Development Screened By Trees In Winter

3.0 ARCHITECTURAL PROOF

3.3 Impact on the Streetscenes – Westfield Avenue and Kingfield Road

3.3.2 Kingfield Road

3.3.2.08 Bulk: Do any of the larger (height) elements of the proposed buildings adjoin the street? Yes but these are substantially screened behind mature trees and only visible as one walks into the site not seen from outside – refer to TVIA Application Document (AD2.2) Appendix B Page 43. Only a limited element of the overall massing of the site presents itself to Kingfield Road so limited ‘bulk’ is visible.



Extracted from: Woking Football Club_ES_Vol2_TVIA_Updated. Page 45

FIGURE 71: CGI showing New Development Screened By Trees In Winter

3.3.2.09 Conclusion: The proposals respect the character and scale and design of the streets as well as create their own character and serve to enhance the streetscene. This accords with Core Strategy policies CS21 and CS24.

3.0 ARCHITECTURAL PROOF

3.4 Design Approach, and Scale

3.4.1 Core Design Principles – Quality is key

3.4.1.02 As a result the residential buildings footprint will now only cover 23% of the site. This cannot be described as excessive as site coverage.

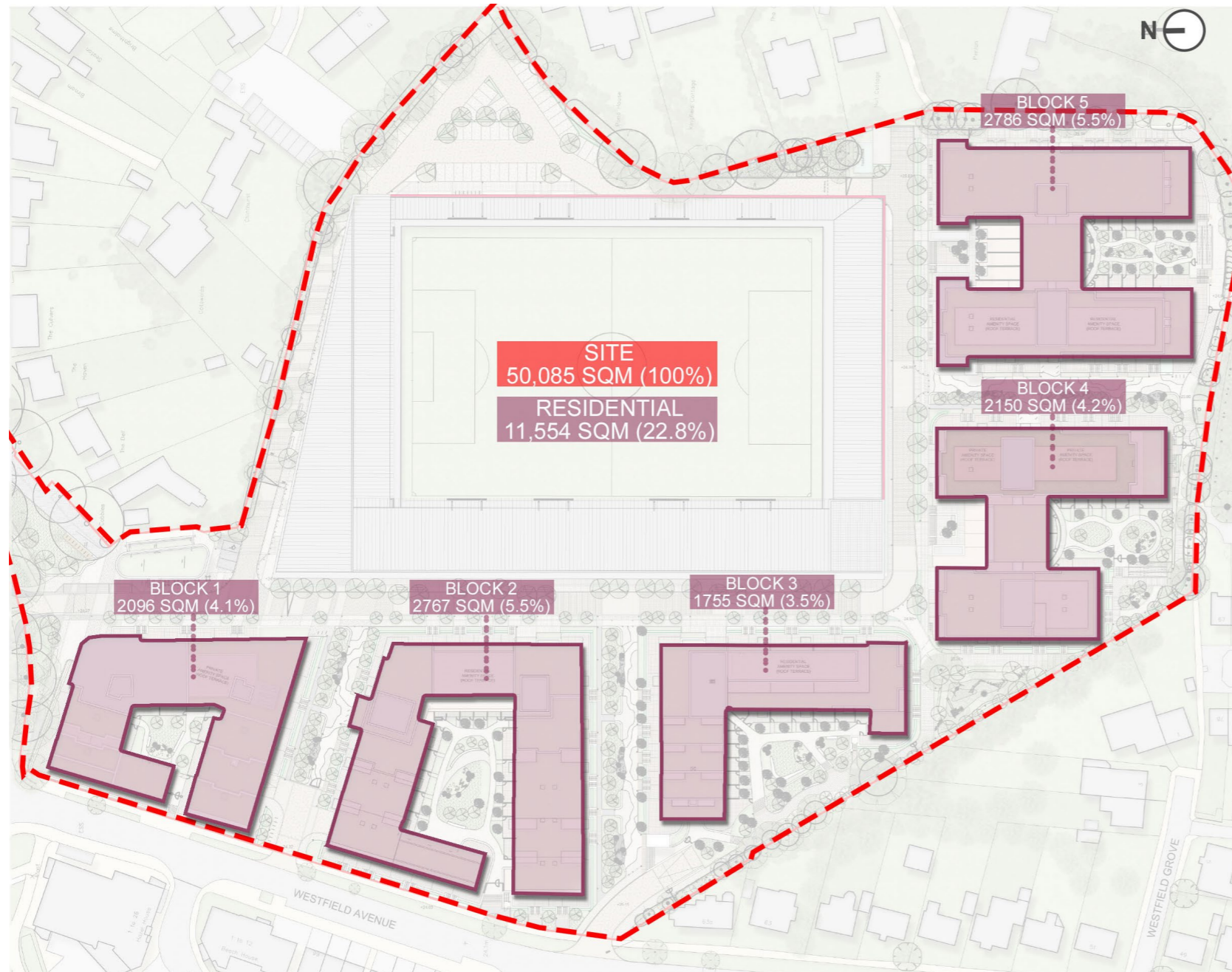


FIGURE 75: Residential Percentage of Site

- FOOTPRINT OF RESIDENTIAL 23% OF THE SITE
- NOT 'EXCESSIVE'
- 5 BLOCKS SEPARATED BY GENEROUS PEDESTRIAN STREETS AND PUBLIC REALM
- ARTICULATED DESIGN
- CLEAR LEGIBILITY OF DESIGN

3.4.1.03 That is a positive design change and moves the part open, derelict and 'industrial' site character to residential. The stadium has been moved into the north east corner where previously industrial style sat of a similar scale, and in many cases were closer to residential boundaries than occurs under the proposed scheme.

3.0 ARCHITECTURAL PROOF

3.4 Design Approach, and Scale

3.4.1 Core Design Principles – Quality is key

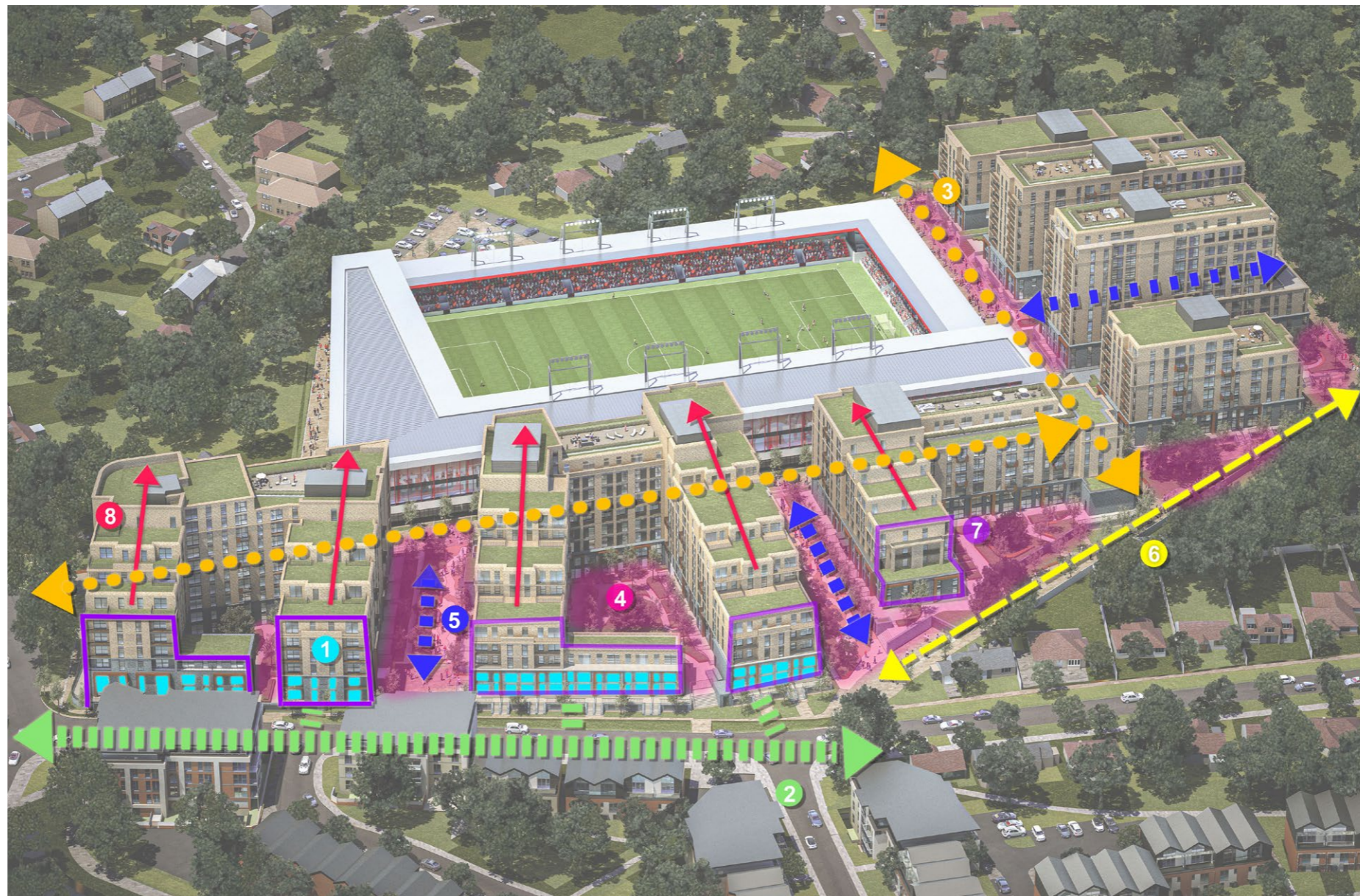
3.4.1.04 The improvements to character arising from a new stadium are considerable creating the opportunity for a landmark and destination in the town. Those key beneficial changes I have summarised below which are in line with good design principles and many of the core design objectives:

1. ANIMATING THE EXISTING AND NEW STREETS WITH WINDOWS AND FRONT DOORS THAT ACTIVATE THE STREET AND MAKE PEOPLE FEEL SAFE

2. COMPLETING AND REPAIRING THE EMPTY STREET FRONTAGES TO WESTFIELD AND KINGFIELD

3. CREATION OF NEW STREETS THAT CONNECT AND KNIT THE SCHEME INTO ITS CONTEXT

4. HIDING VEHICLES BELOW BUILDINGS, MAKING LANDSCAPE & PUBLIC REALM LED SCHEME



5. IMPROVE THE PERMEABILITY AROUND AND THROUGH THE SITE. NEW CONNECTIONS NOW EXIST THAT DID NOT BEFORE

6. CREATE EXTENSIVE NEW PUBLIC AND PRIVATE AMENITY SPACE AND CONNECT TO THE EXISTING NETWORK

7. CREATE NEW HIGH QUALITY FACADE DESIGN THAT IS DISTINCTIVE AND AT THE SAME TIME COMPLIMENTARY TO THE CONTEXT

8. ARTICULATE THE BUILDINGS SO THAT THEY PROVIDE A VARIED STREETSCENE AND USE SCALE TO REINFORCE KEY VISTAS AND ARRIVAL POINTS

FIGURE 76: Aerial CGI showing Core Design Principles

3.0 ARCHITECTURAL PROOF

3.4 Design Approach, and Scale

3.4.1 Core Design Principles – Quality is key

3.4.1.05 All that change will naturally change the character so that is inevitable. If we accept character will change and is complementary by nature of its use for all the positive reasons above then logically there can be acceptance to other changes in character such as scale.

3.4.1.06 It is undeniable that we have used scale at certain points to define the new character. However we have been careful in its use and location. The design solution considers scale disposition and height.

3.4.1.07 Larger scale is not a harm in itself. In many ways its quite subjective and relates not only to local character but also the character created through a development. It is clear to me that Woking has a character of varied scale as one of the pages in the Design SPD (2015) illustrates some very tall buildings next to some very low buildings and a clear vision for the town in the Design SPD (2015) (CD4.13).

3.4.1.08 “Larger scale is used WITHIN the site to create critical mass, drama and excitement, not externally where it meets neighbours”



Extracted from: L(00)284K Design and Access Statement, Page 135

FIGURE 77: Scale of Proposal

3.0 ARCHITECTURAL PROOF

3.4 Design Approach, and Scale

3.4.1 Core Design Principles – Quality is key

3.4.1.09 The key criticism that has to be tested is not that we have changed the character which we accept we have, for many good reasons, but it is whether the change in scale excessive or harmful in its relationship with the existing development that will remain in the surrounding area. Let us not forget this is a stadium redevelopment alongside new residential. It is grounded in regeneration. It is not just a housing scheme like Willow Reach and is not out of the ordinary as a comprehensive stadium redevelopment. For example there are similar approved proposals of redevelopment at Brentford FC and Wimbledon FC provided at Figures 20, 21, 98-102.

3.4.1.10 I recognise that had this simply been a housing scheme alone its overall scale may have been lower. However as a comprehensive redevelopment creating a new destination buffering a football stadium that needs to be a landmark in a town the design solution needs to balance surrounding context with destination. Its location within the town not far from the Town Centre drive the context and design approach as outlined in the separate Proof of Mr Collins.

3.4.1.11 It must have a high quality character, be distinctive in style, but be complimentary, through the use of materiality. It should also reinforce arrival, key routes, create activity, be dynamic and so on, all of which require changes in scale and design.

3.4.1.12 The design approach was praised by the DSE panel at Design Review (CD 4.17) and supported in the Committee Report (CD3.1). As we know the design panel suggested even greater scale. Considerable weight should be given to the support from the DSE panel.

3.4.1.13 The design itself concentrates larger scale within the site.

3.4.1.14 The bulk and mass of the design is broken by separating the buildings into blocks, and these blocks themselves then step up and down, and are layered visually to reduce apparent scale, and respond to key aspects of the masterplan design. Separation distances between blocks and streets are predominantly 21m or greater which is the standard benchmark for separation distances and is consistent with the 2008 SPD on Outlook, Amenity, Privacy and Daylight (CD 4.12).

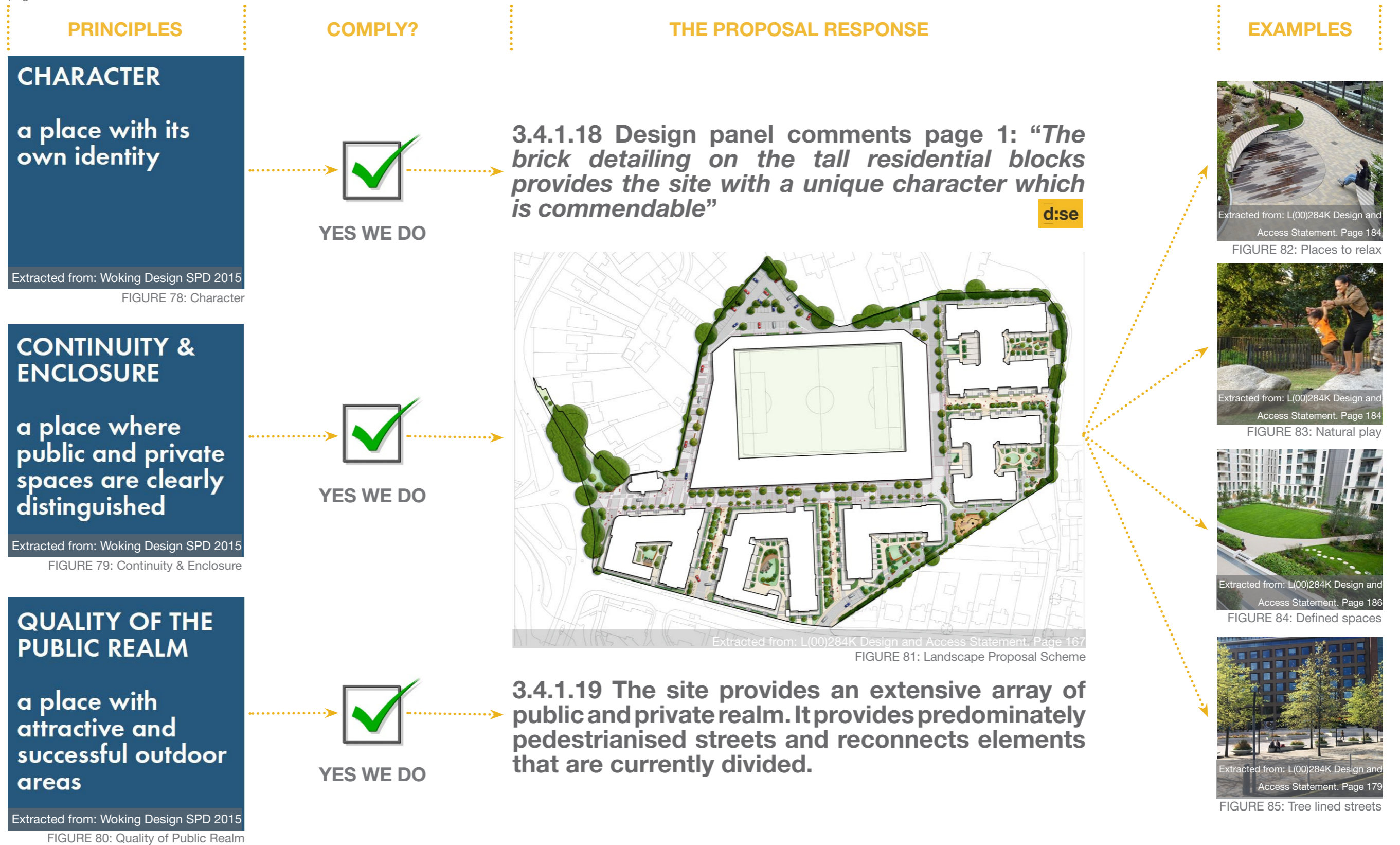
3.4.1.15 The fact that this solution creates a new integrated neighbourhood that is broken down and layered and carefully articulated means that its bulk, scale and massing is not excessive when considered in isolation, or in context.

3.4.1.16 If not excessive in isolation given that this site is capable of a new character, then it can be strongly argued that it could not be excessive when it replaces what was a large scale character previously.

3.0 ARCHITECTURAL PROOF






3.4.1 Urban Design Principles

3.4.1.17 If we test the design against the Design SPD (2015) Section 5 Urban design principles we see that it satisfies all of these thus we satisfy the aspirations of the Design SPD (2015) (CD4.13). Those principles are set out on this and the following 2 pages.



3.0 ARCHITECTURAL PROOF

3.4.1 Urban Design Principles

PRINCIPLES	COMPLY?	THE PROPOSAL RESPONSE
<p>EASE OF MOVEMENT</p> <p>a place that is easy to get to and move through</p> <p><small>Extracted from: Woking Design SPD 2015 FIGURE 86: Movement</small></p>	 YES WE DO	<p>3.4.1.20 A simple design centred around a new main street, with new streets connecting to existing roads and footpaths in a location 15 minutes from the town centre.</p> <div style="display: flex; justify-content: space-around;">   </div> <p><small>Extracted from: L(00)284K Design and Access Statement. Page 142</small> <small>Extracted from: L(00)284K Design and Access Statement. Page 162</small></p>
<p>LEGIBILITY</p> <p>a place that has a clear image and is easy to understand</p> <p><small>Extracted from: Woking Design SPD 2015 FIGURE 87: Legibility</small></p>	 YES WE DO	<ul style="list-style-type: none"> • CLEAN DESIGN • EASY REFERENCE POINTS • CLEAR ROUTES • SAFE ROUTES • NO DEAD ENDS • PASSIVE SURVEILLANCE
<p>ADAPTABILITY</p> <p>a place that can change easily</p> <p><small>Extracted from: Woking Design SPD 2015 FIGURE 88: Adaptability</small></p>	 YES WE DO	<p>3.4.1.21 The proposed frame construction allows the development to change over time and allows internal alterations.</p>

3.0 ARCHITECTURAL PROOF

3.4.1 Urban Design Principles



3.0 ARCHITECTURAL PROOF

3.5 Height in Context, and Relative Height/Footprint

3.5.1 Design and Height

3.5.1.00 The heights of the new buildings where they meet the adjacent streets are in character and scale as set out in sections 3.2 and 3.3.

3.5.1.01 As already identified the site is of sufficient size (width and depth) to have its own character and combined can have a greater scale 'within' the site that then steps down to the edges.

3.5.1.02 The refusal reasons do not refer to the scale within the site other than the scheme failing to respect and make a positive contribution to the character of the area. The real and only issue can be the interaction of the proposal with the existing development at and beyond its edges.

3.5.1.03 If I look at the existing photos below looking into the site it is difficult to see how many developments would fail to make a positive contribution.



Extracted from: Woking Football Club_ES_Vol2_TVIA_Updated. Page 6

FIGURE 94: Street view of South Stand



Extracted from: Woking Football Club_ES_Vol2_TVIA_Updated. Page 14

FIGURE 95: Street view of Site from Westfield Avenue



Extracted from: Woking Football Club_ES_Vol2_TVIA_Updated. Page 28

FIGURE 96: Street view looking down Westfield Avenue

3.0 ARCHITECTURAL PROOF

3.5 Height in Context, and Relative Height/Footprint

3.5.1 Design and Height

3.5.1.04 It cannot be challenged that a good high quality design of scale cannot be seen to make a positive contribution to the character of an area when there is already scale and a different discordant character in that area.

3.5.1.05 Certainly where that scale is located well away from low rise boundaries then what harm can be inflicted other than subjective views about personal preference on scale and design?

3.5.1.06 The Committee Report (CD3.1) paras 373 to paras 408 (excluding paras 388 and 393) acknowledge this. However I disagree with the conclusions of para 409 – see section 4.0.

3.5.1.07 I acknowledge that the scale within the site is taller than its predecessors. However that scale acknowledges entry points, reinforces a new active street, compliments the stadium scale and is used to articulate the design. It is also away from sensitive boundaries.

3.5.1.08 The character is already different from the context now and hence so long as those new buildings of height do not harm (to a point that the negatives outweigh the benefits) the immediate context I would question why greater scale carefully located should not be used to identify this new destination. Clearly this line of reasoning is acceptable as exemplified at Harrington Place - where 2 storeys of domestic scale meets 7 storeys - see figures 37- 40.

3.5.1.09 The proposals are significantly lower than the scale used in the town centre that accommodates buildings up to 30-35 storeys and as I have outlined, key opportunity sites of sufficient scale such as West Byfleet are allocated medium to high density and taller buildings. The Proposals are complimentary to the intent of the Design SPD (2015) (CD4.13) supporting scale and new character in this location.

3.5.1.10 Clearly the planning officers agree that this would be the case otherwise they would not have supported the application.

3.5.1.11 It is recognised that most new stadium redevelopments are buffered next to traditional residential and hence larger building are used to buffer that activity from nearby residential as well as compliment the **new** activity that takes place as part of a football stadium redevelopment - see figures 20, 21, 98-102.

3.5.1.12 In relation to scale the tallest stand is positioned along the new main street away from existing homes, low stands front the north and east edges (behind dense landscape). The design celebrates that main street with the taller building blocks that rise to the entry and the town centre and drop as one moves south.

3.0 ARCHITECTURAL PROOF

3.5 Height in Context, and Relative Height/Footprint

3.5.1 Design and Height

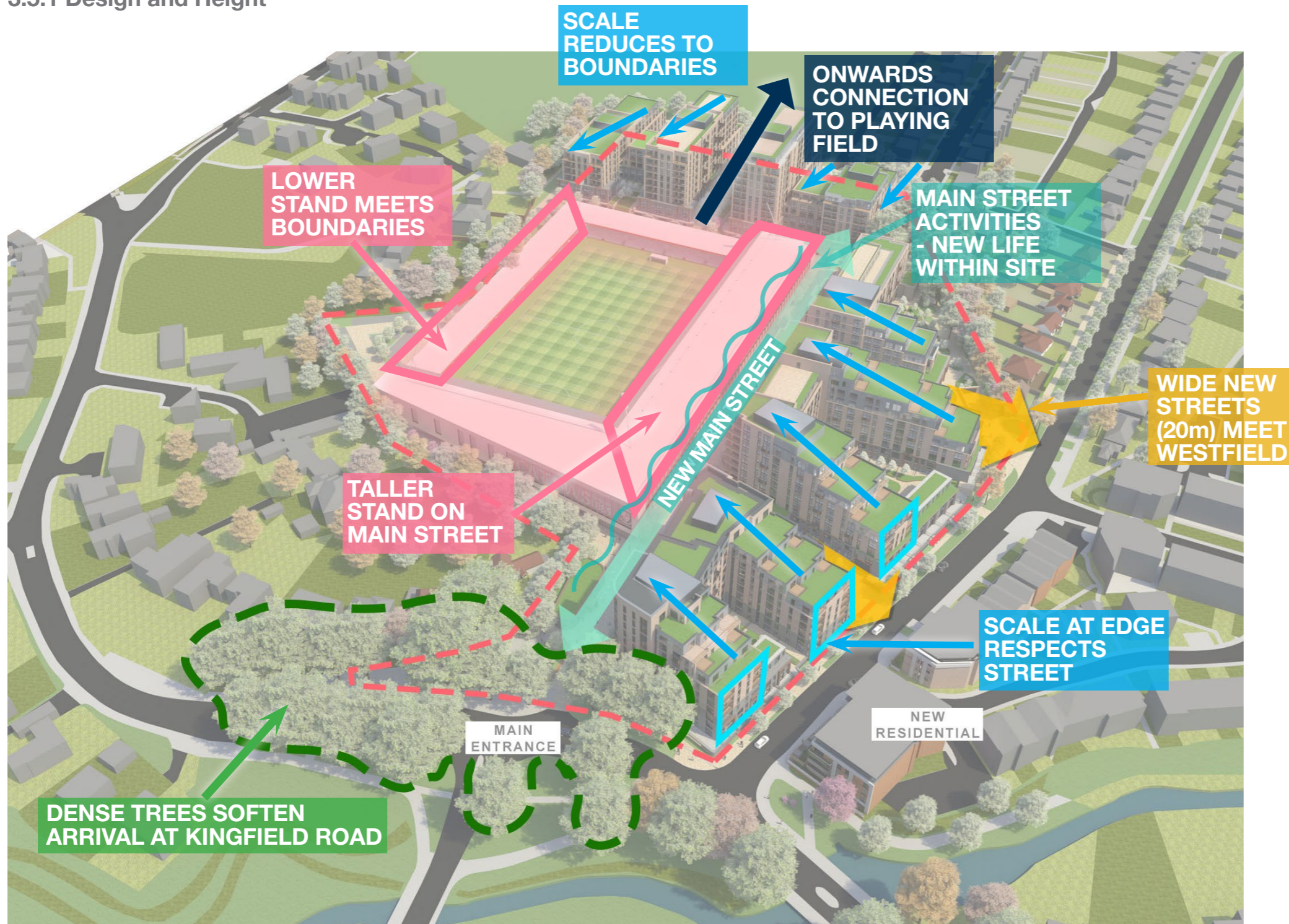


FIGURE 97: Proposed Stadium Stand heights and proximity

3.0 ARCHITECTURAL PROOF

3.5 Height in Context, and Relative Height/Footprint

3.5.1 Design and Height

3.5.1.13 Looking at examples of new football stadiums of comparable scales in Wimbledon and Brentford these new redevelopment schemes all create their own character have greater scale to mark the destination and create new streets. These will clearly affect their setting but not in a way that warrants their refusal as these two schemes have been consented. These both sit bordering 'traditional' 2 storey residential.



FIGURE 98: Brentford FC aerial view



FIGURE 99: Brentford FC arrival view



FIGURE 100: Brentford FC street view



FIGURE 101: Wimbledon FC aerial view



FIGURE 102: Wimbledon FC arrival view

3.0 ARCHITECTURAL PROOF

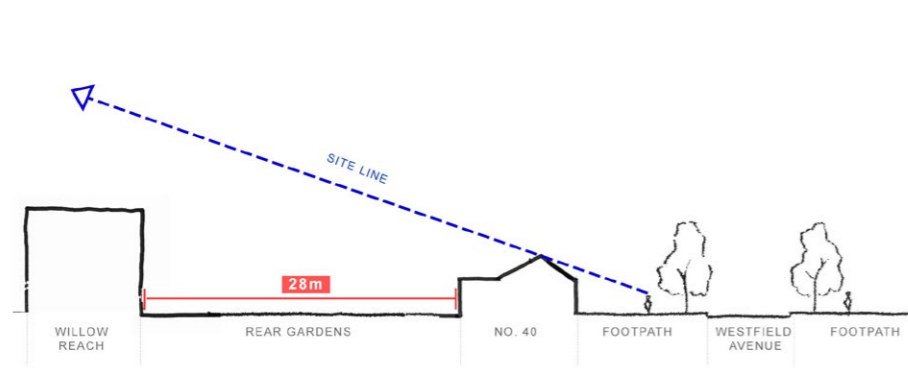
3.5 Height in Context, and Relative Height/Footprint

3.5.1 Design and Height

3.5.1.14 Westfield Avenue is not simply a road of single and two storey homes. It is a road that changes to higher scale as you arrive at the football club but before you even arrive there, to the west, there is a line of new homes sitting close to the rear of the existing homes – see photo below. These make the design and feel of this street not a conventional street. This line of homes is close to the rear of the existing dwellings of a **continuous** unbroken form and arguable a little overbearing due to their proximity (the Councils own Outlook, Amenity, Privacy and Daylight (2008) (CD4.12) suggests 30m and this separation is below that). It is all that is seen between the spaces between the existing homes.

3.5.1.15 The new Proposals are set back a significant distance from the existing homes and have breaks in the frontage and are articulated. As can be seen from the comparable sections below – one looking west towards the existing built form, and one looking east towards the Proposals - whilst we are taller (scale is broken down by layering of facades) we are both behind existing dense trees and a significant distance from the homes.

3.5.1.16 Taking sight lines from the street it can be shown on these sections below that when we are in front of a dwelling we will not see the Proposal behind and when we are between the homes we are over 80 metres from the new buildings. I refer to the following pages which illustrate some additional street CGI's showing what one would see if you look from the other side of the bordering homes – shown as before and after images.



WESTFIELD AVENUE
SECTION LOOKING WEST

FIGURE 103: Existing section showing Site Lines from Westfield Avenue West



WESTFIELD AVENUE
SECTION LOOKING EAST

FIGURE 104: Proposed section showing Site Lines from Westfield Avenue East



FIGURE 105: Panoramic view of houses along Westfield Avenue Western Side

3.0 ARCHITECTURAL PROOF



FIGURE 106: Existing view looking West from Kingfield Close



FIGURE 107: Proposed view looking West from Kingfield Close

3.0 ARCHITECTURAL PROOF



FIGURE 108: Existing view looking East towards Site next to South Stand behind bungalows along Westfield Avenue



FIGURE 109: Proposed view looking East towards Site next to South Stand behind bungalows along Westfield Avenue (Development 70m from Westfield Avenue)

3.0 ARCHITECTURAL PROOF

3.5 Height in Context, and Relative Height/Footprint

3.5.2 What constitutes excessive?

3.5.2.00 I thought that if we were to be considered 'excessive' by any of the measures that the refusal suggests (remembering that the RFR says it is the cumulative impact that causes harm) we would need to have excessive height and mass consolidated and concentrated in one location or taking up a significant part of the site, near neighbours and/or to be significantly taller than those neighbours.

3.5.2.01 As a simple test to see how that measures up across what is a large site I have set up the plans below that identify the extent of height that is 2 storeys or above the tallest neighbour (5 storeys being Hazel House and obviously deemed acceptable as consented) and how much footprint and how much taller coverage we have of that 'taller height'.

3.5.2.02 Clearly if there is a significant amount of tall accommodation concentrated in a sensitive position or over a significant site area then that could be a marker or test of excessive.

3.5.2.03 The plans below show the results - extracted into appendix 3 for large scale plans.

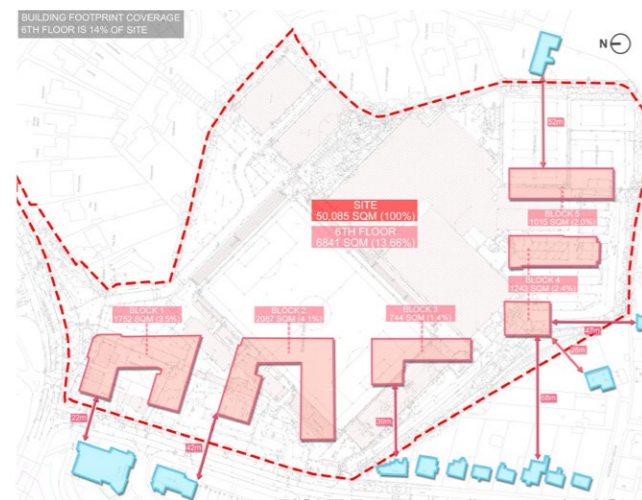


FIGURE 110: 6th floor 14% of Site

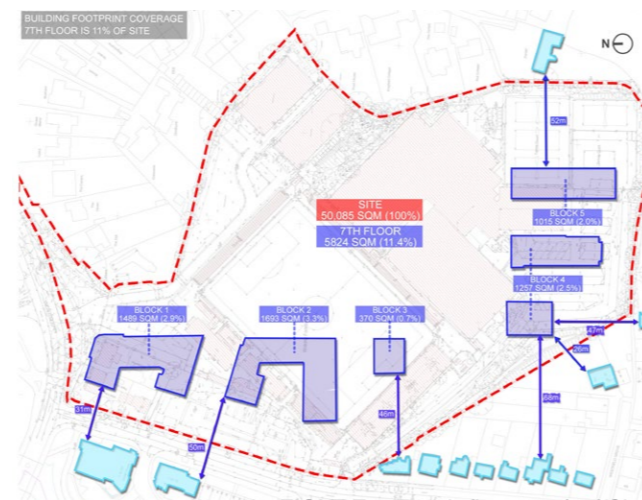


FIGURE 111: 7th floor 11% of Site



FIGURE 112: 8th floor 9% of Site



FIGURE 113: 9th floor 4% of Site



FIGURE 114: 10th floor 2% of Site

3.5.2.04 As can be seen the extent and scale cannot be seen to be excessive in relation to the site coverage, proximity to boundaries, or clustered in one location.

3.5.2.05 The taller scale is generally located along the new main street which creates the new character and the destination or in the central area opposite the playing fields themselves where there is an open aspect with no immediate neighbours.

3.5.2.06 Clearly the above ignores the fact that there is a further layer of dense existing and new landscape/trees and fragmented views blocked by existing and new buildings that will break that larger scale down even further. All of this leads me to conclude at RFR 1 when properly scrutinised completely fails to identify any lack of the development proposal which in any material regard harms either the streetscenes or the character of the area.

3.0 ARCHITECTURAL PROOF

3.6 Design Review Panel

3.6.00 The design panel review whilst making six key recommendations (many of which were taken onboard and our responses to those is identified in the Design & Access Statement Application Document (AD2.5) page 196), was extremely positive.

3.6.01 It did not challenge the principles of the scale indeed it suggested perhaps building heights could be made taller (DSE response Core Document (CD4.17) para 2.2 and 2.3) and did not challenge the impacts on character.

3.6.02 In this respect the Design panel clearly did not see harm or excessive scale to be a consideration.

3.7 Committee Report

3.7.00 The Committee Report (CD3.1) speaks for itself. It should be given considerable weight because it is the product of careful professional assessment resulting from analysis over the duration of the applications and significantly and by definition has the full approval of the council's professional planning hierarchy all the way up to the Head of Development Management.

3.7.01 I however disagree with para 388,393 and 448 which suggests overbearing effect on 2 Westfield and Penlan as reviewing the 2008 SPD on Outlook, Amenity, Privacy and Daylight (CD4.12) identified the Proposals have no harm - see section 4.0. Nonetheless notwithstanding the officers views which differed from mine on this the schemes were wholeheartedly recommended for approval.

3.8 Townscape

3.8.00 Alongside the architectural explanation and approach, a separate TVIA Application Document (AD2.2) was completed for the site and the new Proposals, which was carried out by an independent TVIA Consultant and accompanied the planning submission. Some of the figures from the TVIA have been used in this evidence.

3.8.01 This TVIA document identified a whole range of views all of which were identified as either neutral or a positive contribution to Townscape as required by the Design SPD (2015) (CD4.13) and policy CS24 (CD4.1).



4.0 Architectural Proof in response to Refusal Reason no 3/ Topic Area C.

(No.2 Westfield Grove and Penlan (Kingfield Green), Cedars (Kingfield Green) and Nut Cottage (Kingfield Green))

4.0 ARCHITECTURAL PROOF

4.0 No.2 Westfield Grove and Penlan (Kingfield Green), Cedars (Kingfield Green) and Nut Cottage (Kingfield Green)

4.0.00 The refusal references **loss of privacy** to Nut Cottage and The Cedars and **Loss of Privacy and overbearing effect** to Penlan and no 2 Westfield Grove.

4.0.01 For ease of reference to location and impacts, I have highlighted the affected properties on the plan below alongside the current and proposed scenarios.

4.0.02 The SPD 'Outlook, Amenity, Privacy and Daylight SPD (2008)' (CD4.12) highlights what privacy relates to however it does not categorise 'overbearing effect' (but does make a few references to it in the text) so this has to be a subjective judgement albeit the commentary in the 2008 SPD on Outlook, Amenity, Privacy and Daylight does assist.

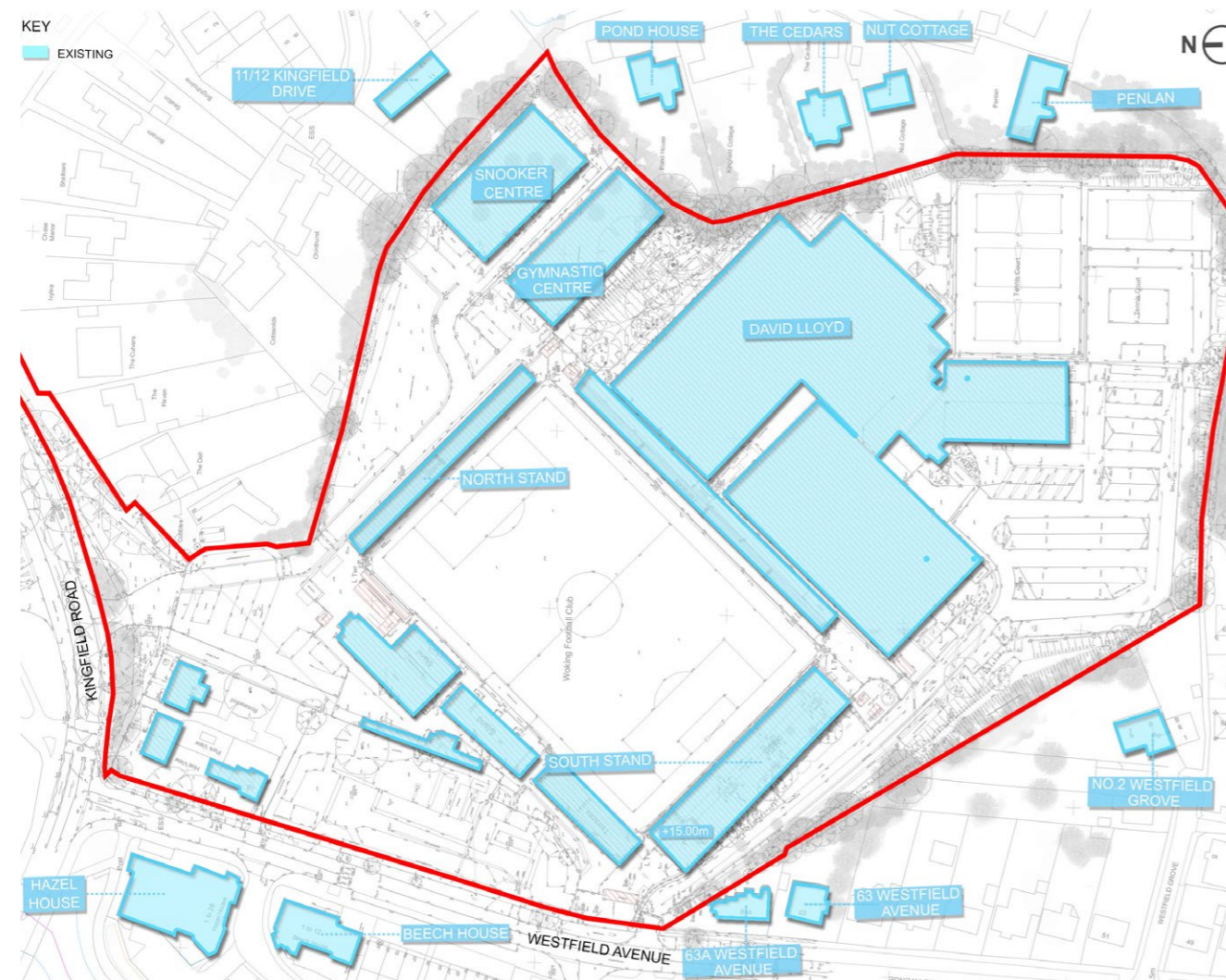


FIGURE 115: Existing Site Plan



FIGURE 116: The Proposed site plan, with boundary trees highlighted and the four alleged affected properties in red

4.0 ARCHITECTURAL PROOF

4.0 No.2 Westfield Grove and Penlan (Kingfield Green), Cedars (Kingfield Green) and Nut Cottage (Kingfield Green)

4.1 Impact on Nut Cottage and the Cedars – Impact on ‘Privacy’

4.1.00 Privacy in the 2008 SPD on Outlook, Amenity, Privacy and Daylight (CD4.12) refers to protection of habitable rooms and intimate areas of private outdoor amenity. It also refers to ‘directly’ overlooking habitable windows which the scheme does not do. Clearly the situation would have to be worse than existing to create a negative effect.

4.1.01 Looking at the existing boundary it is clear that there is a significant belt of trees along the eastern boundary both within the private gardens of these properties and also within the development site.



FIGURE 117: Diagram showing existing Tree Boundaries to Nut Cottage/ Cedars

4.0 ARCHITECTURAL PROOF

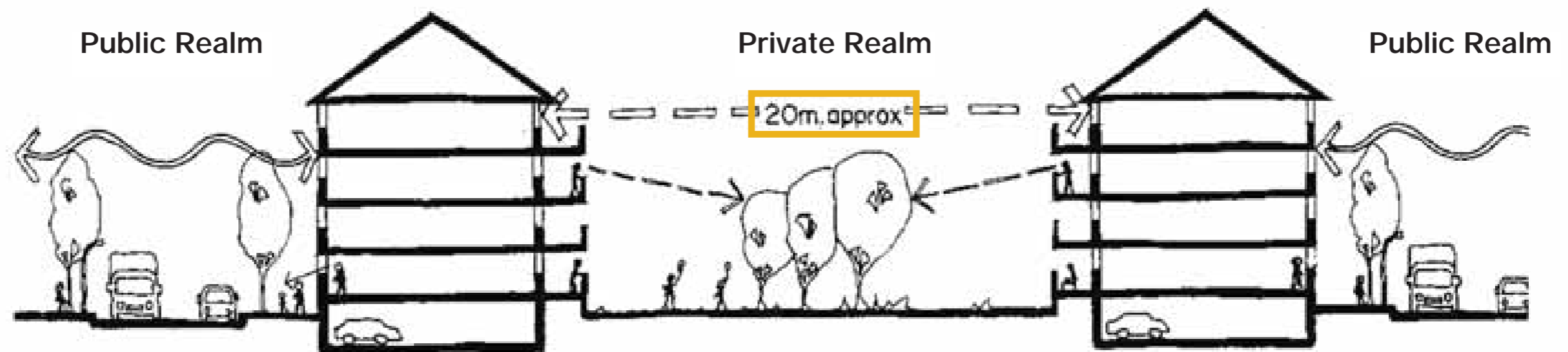
4.0 No.2 Westfield Grove and Penlan (Kingfield Green), Cedars (Kingfield Green) and Nut Cottage (Kingfield Green)

4.1 Impact on Nut Cottage and the Cedars – Impact on ‘Privacy’

4.1.02 These areas of trees are being retained as part of The Proposal. The landscaping in its own right will offer significant screening as it appears to be at least as tall if not taller than the existing homes.

4.1.03 The 2008 SPD on Outlook, Amenity, Privacy and Daylight (CD4.12) recommends 30m between buildings where windows look directly towards one another of 3 storeys or taller - Page 16 para 5.11

4.1.04 But it also allows this to be reduced to **below** this 30m distance page 17 para 5.13 – intimating 20m in the diagram below where landscape buffers the views OR Para 5.2 page 16 where buildings are angled.



Extracted from: Outlook, Amenity, Privacy & Daylight SPD 2008, Figure 16

FIGURE 118: Effective Screening can be used to achieve privacy at reduced separation

4.0 ARCHITECTURAL PROOF

4.0 No.2 Westfield Grove and Penlan (Kingfield Green), Cedars (Kingfield Green) and Nut Cottage (Kingfield Green)

4.1 Impact on Nut Cottage and the Cedars – Impact on ‘Privacy’

4.1.05 The new stand that sits facing those properties is set within the site circa 27m to 36m from the rear of the closest home. The new stand has no windows or aspect towards the homes so no loss of privacy can happen as a result of this anyway.

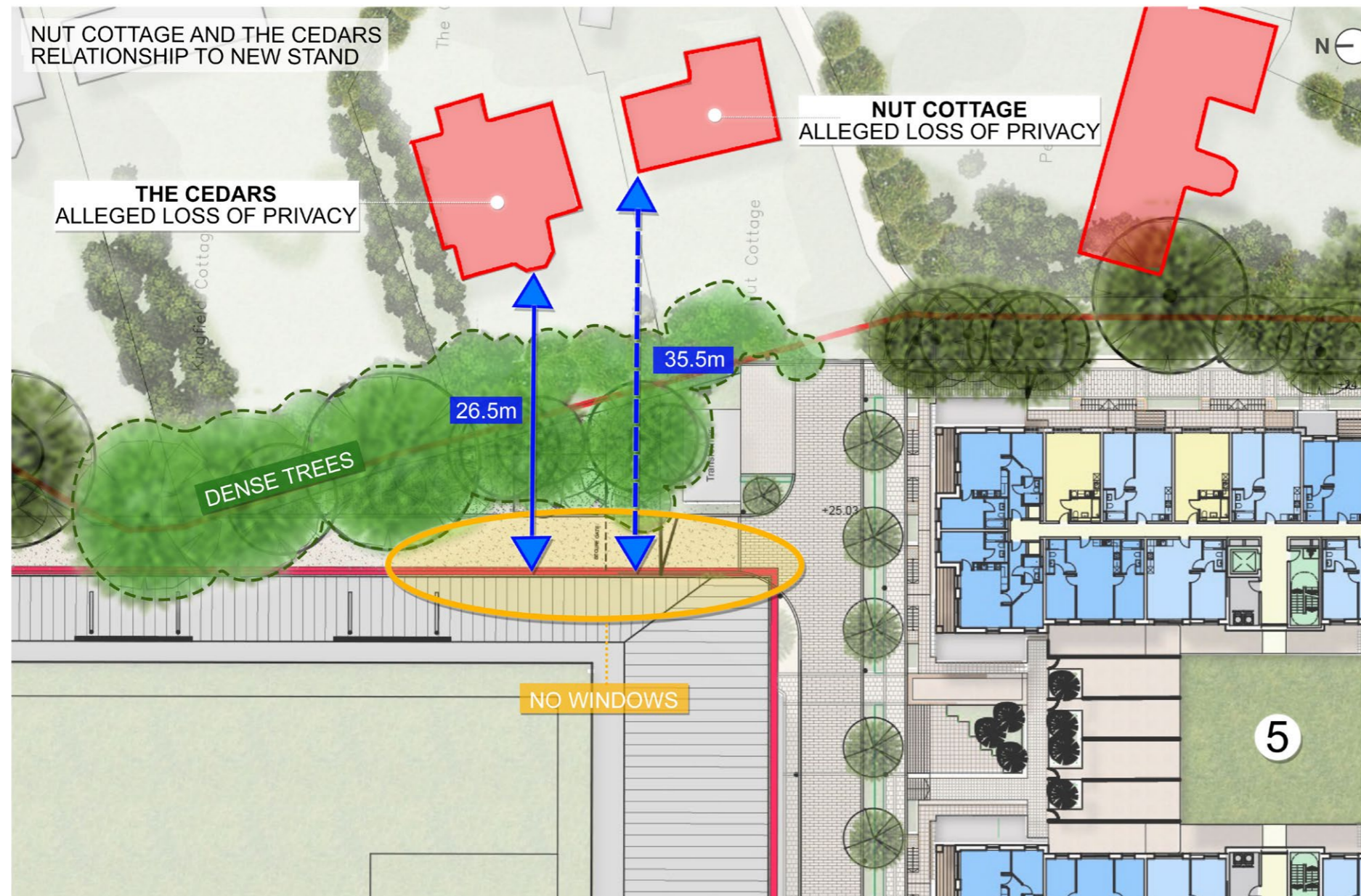


FIGURE 119: Nut Cottage and The Cedars relationship to New Stand

4.0 ARCHITECTURAL PROOF

4.0 No.2 Westfield Grove and Penlan (Kingfield Green), Cedars (Kingfield Green) and Nut Cottage (Kingfield Green)

4.1 Impact on Nut Cottage and the Cedars – Impact on ‘Privacy’

4.1.06 In relation to block 5 this building is not opposite those homes so the 2008 SPD on Outlook, Amenity, Privacy and Daylight (CD4.12) is not relevant as the test of windows directly facing the properties doesn't apply. It has no windows overlooking those homes as the windows in those new apartments face north and east. See the plan extract below identifying this.

4.1.07 If it is suggested that someone may press oneself against the window to look eastwards out towards the existing homes we must remember that the separation distance between the closest window and the two dwellings is 31m away to Nut Cottage and 39m to the Cedars behind some significant trees so would then also be acceptable under the 2008 SPD on Outlook, Amenity, Privacy and Daylight (CD4.12) given its distance before reduction for angles or landscape is 30m.

4.1.08 Therefore I find it difficult to fathom that there is an unacceptable loss of privacy to these two properties - I refer to Fig 120 below which illustrates an arc of aspect onto which no windows directly face . Both dwellings sit within this arc.

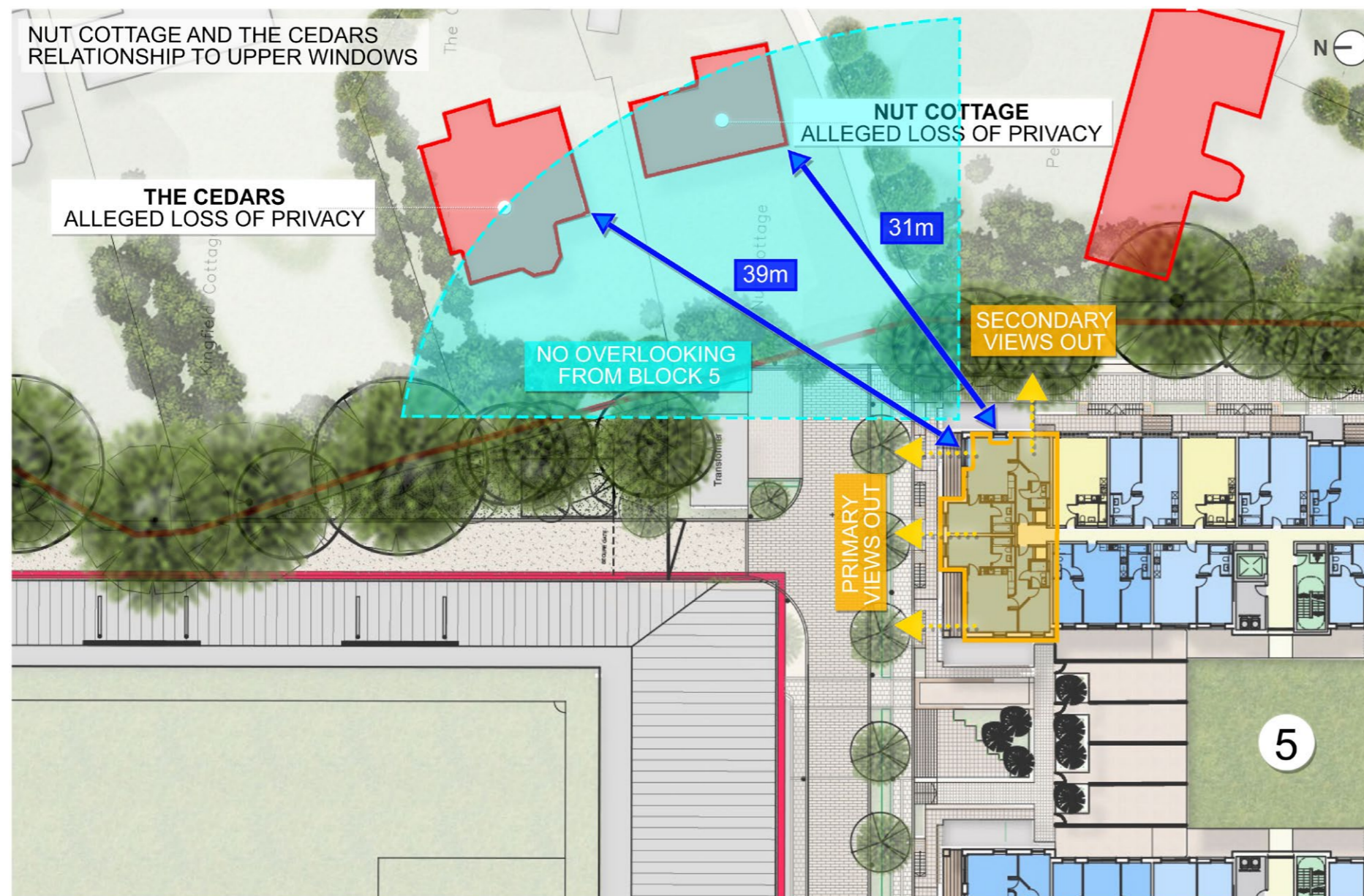


FIGURE 120: Nut Cottage and The Cedars relationship to Upper Windows

4.0 ARCHITECTURAL PROOF

4.0 No.2 Westfield Grove and Penlan (Kingfield Green), Cedars (Kingfield Green) and Nut Cottage (Kingfield Green)

4.2 Impact on Penlan – ‘Privacy and Overbearing’

4.2.00 I have carefully reviewed this boundary in relation to block proximity, scale and overlooking. Context is important.

4.2.01 First, Penlan’s current principal windows outlook is to the south and north – see plan below.

4.2.02 The southern outlook does not look onto our site and neither does the northern outlook. Thus our relationship of building to Penlan is at 90 degrees and our elevations are directed looking East not looking **directly** into any of Penlan’s windows as they do not face that boundary.

4.2.03 That is important as separation distances where one is at 90 degrees to a boundary not facing windows is always considered less than the face to face distance and the 2008 SPD on Outlook, Amenity, Privacy and Daylight (CD4.12) refers to ‘directly’ which this is not.

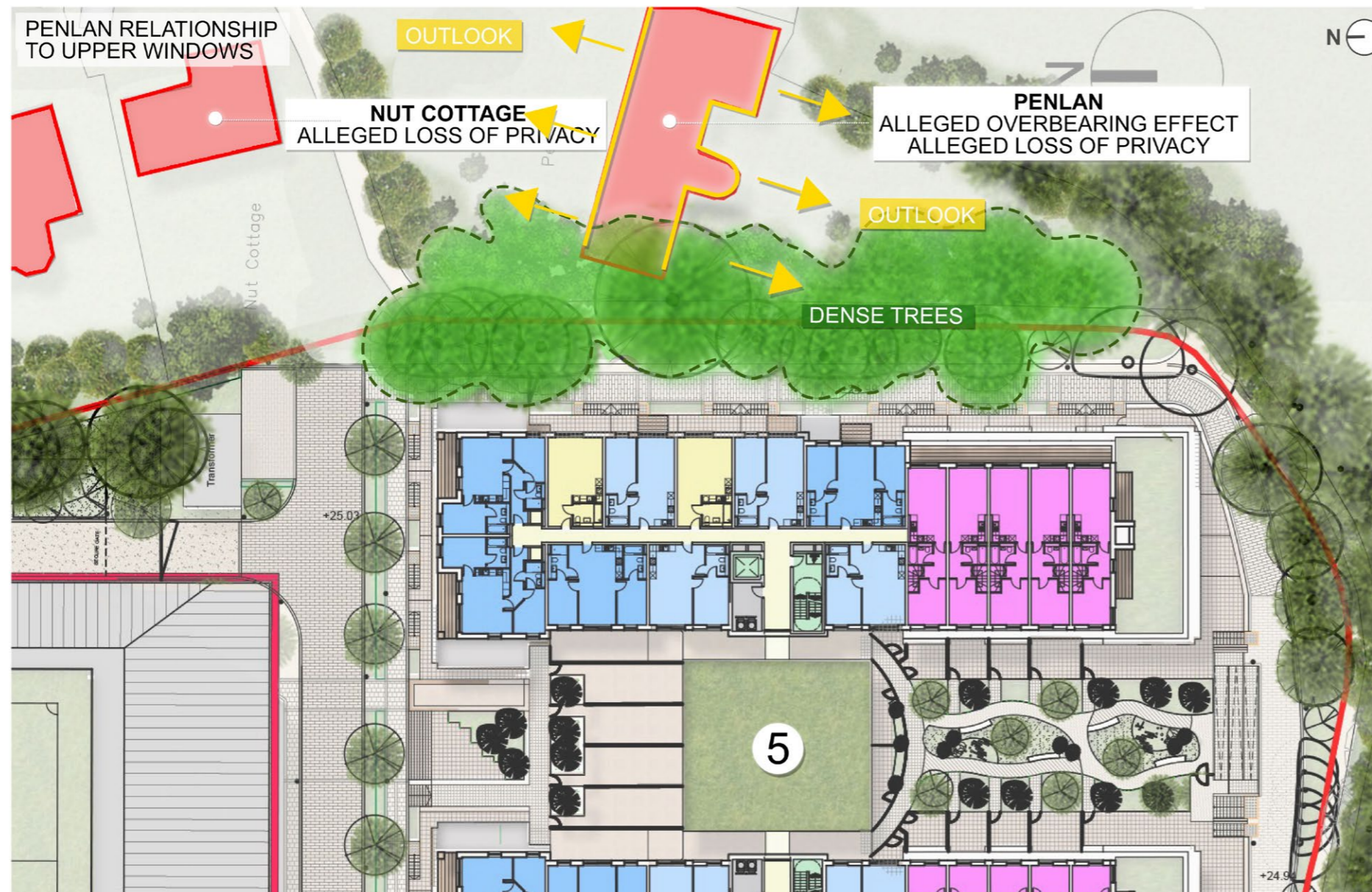


FIGURE 121: Penlan Outlook relationship to Block 5

4.0 ARCHITECTURAL PROOF

4.0 No.2 Westfield Grove and Penlan (Kingfield Green), Cedars (Kingfield Green) and Nut Cottage (Kingfield Green)

4.2 Impact on Penlan – ‘Privacy and Overbearing’

4.2.04 The 2008 SPD on Outlook, Amenity, Privacy and Daylight (CD4.12) (Table 1 from appendix 1 page 25) identifies that front to boundary/flank distances of 3 storey dwellings or greater can be reduced to 15m. We comply with - see table opposite.

4.2.05 So on this basis there is no loss of privacy when tested against the 2008 SPD on Outlook, Amenity, Privacy and Daylight (CD4.12).

4.2.06 Secondly and moreover, Penlan has significant dense and tall trees within its boundary as well as alongside our boundary that already overhang the existing property, and provide significant screening - see diagram below and adjacent images.

No. of Storeys	Measured Dimension	Distance
One	front to front elevation	6
	back to back elevation	12
	front or back to boundary/flank	6
	side to boundary	1
Two	front to front elevation	10
	back to back elevation	20
	front or back to boundary/flank	10
	side to boundary	1
Three and over	front to front elevation	15
	back to back elevation	30
	front or back to boundary/flank	15
	side to boundary	2

Extracted from: 2008 SPD on Outlook, Amenity, Privacy and Daylight. Page 25 Table 1

FIGURE 122: Table describing distances required

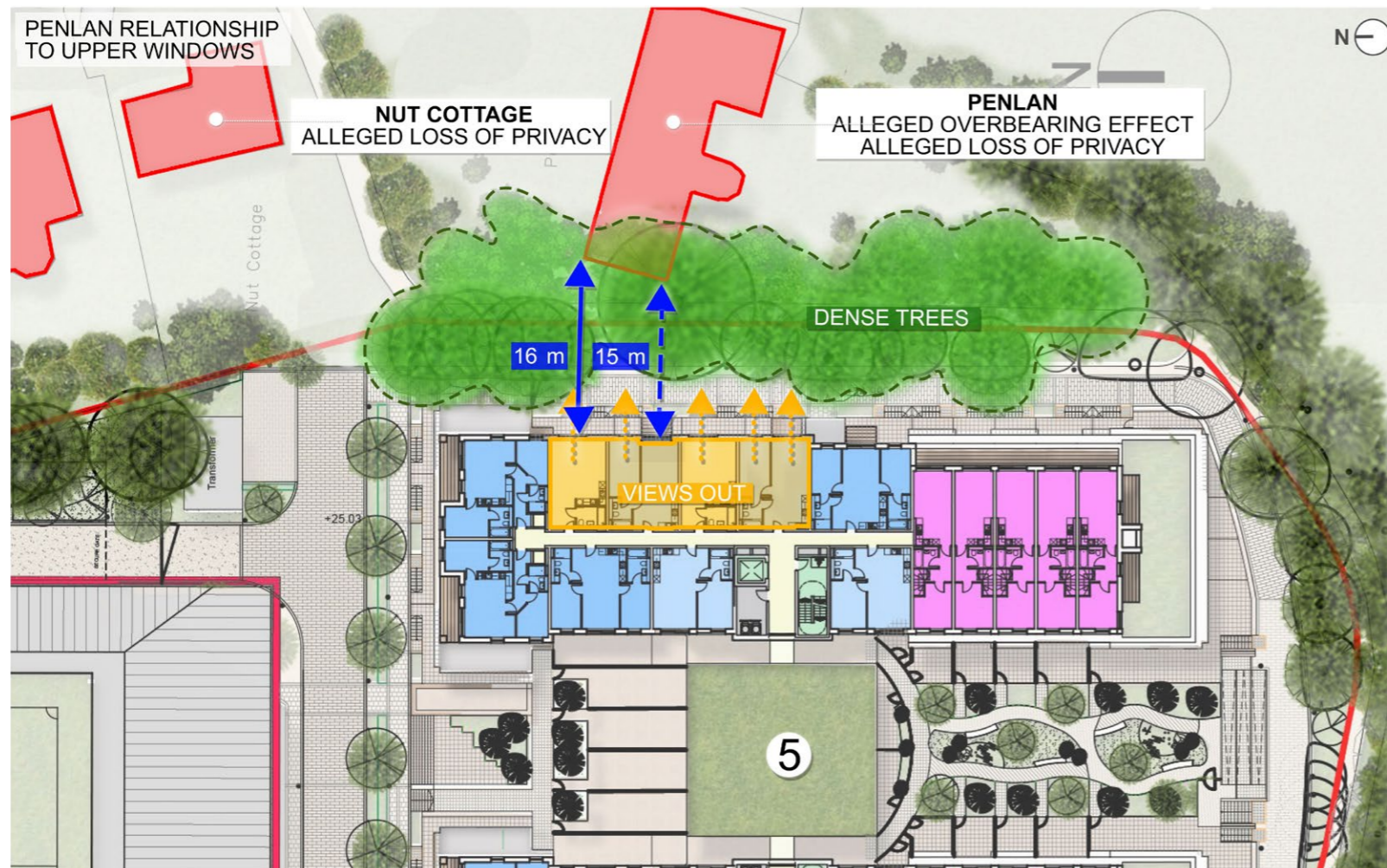


FIGURE123: Block 5 Views Outward to East



FIGURE 70: View of Penlan from West



FIGURE 124: View of Penlan from East

4.0 ARCHITECTURAL PROOF

4.0 No.2 Westfield Grove and Penlan (Kingfield Green), Cedars (Kingfield Green) and Nut Cottage (Kingfield Green)

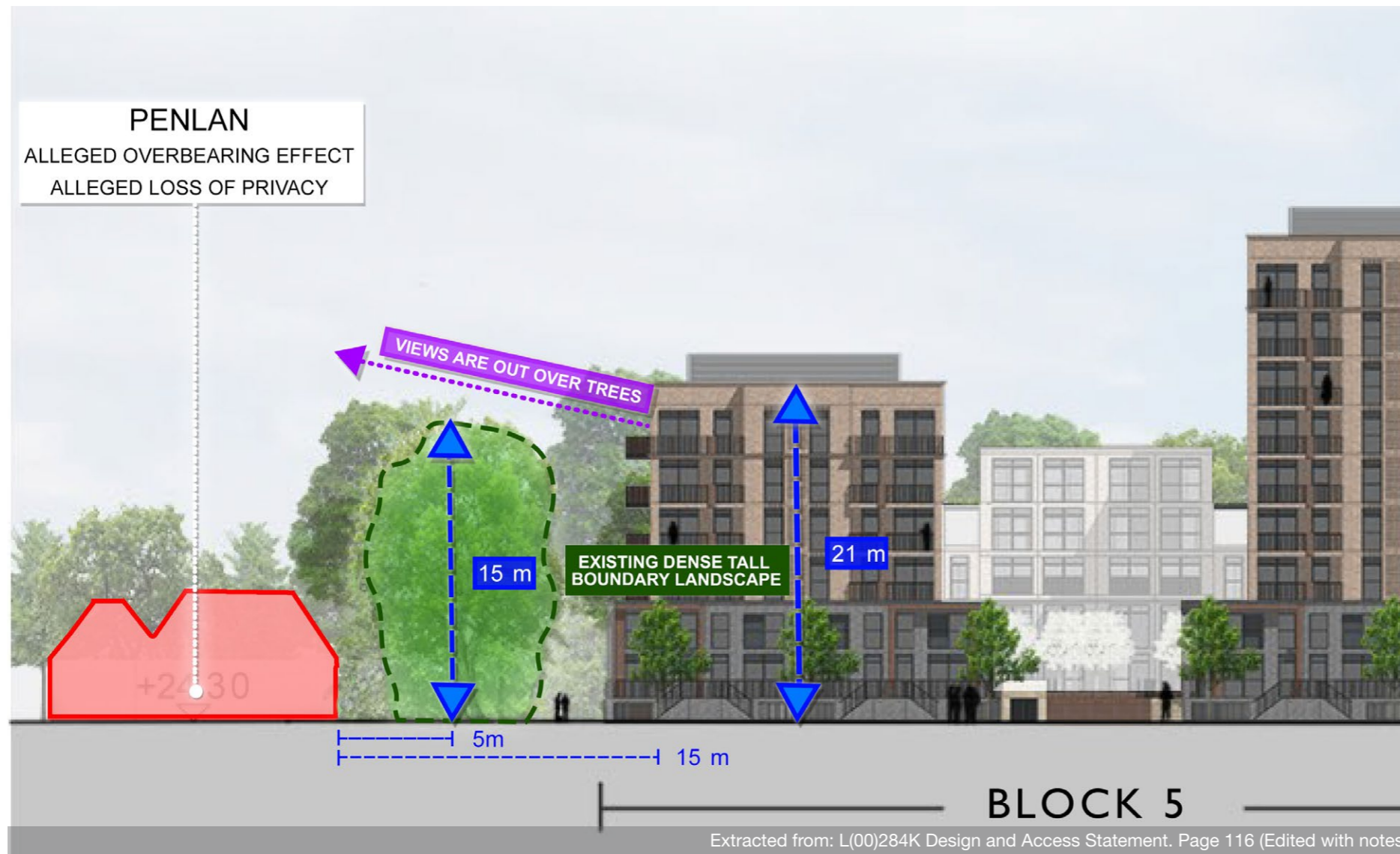
4.2 Impact on Penlan – ‘Privacy and Overbearing’

4.2.07 These existing trees will further mitigate any privacy issues but equally these **already** pose a significant **existing** overbearing effect on the property noting that some of these trees lie within the curtilage of Penlan.

4.2.08 Therefore in positioning our building I have taken account of the fact that we are at 90 degrees to Penlan and that there is an existing very tall and dense tree belt.

4.2.09 On this basis I considered that a 15m separation distance to the boundary was acceptable (and indeed exceeds the recommendations of the 2008 SPD on Outlook, Amenity, Privacy and Daylight (CD4.12) when landscape is considered) as we would not look directly into any windows. I also observe that while Penlan has no windows directly opposite the development where it does have windows located they are more than 15m away. I would suggest that someone would struggle to see through the dense tree belt as a result. The photograph in figure 126 illustrates my point.

4.2.10 In addition my judgement was that the combination of our height balanced against a separation of 15m with a 15m high tree screen did not pose any greater overbearing effect on the property than already existed.



Extracted from: L(00)284K Design and Access Statement. Page 116 (Edited with notes)

FIGURE 125: Section Showing Tree Boundary Height Between Penlan and Block 5



FIGURE 126: View of Penlan from East



FIGURE 127: View of Mature Trees to Penlan Boundary from David Lloyd Car Park

4.0 ARCHITECTURAL PROOF

4.0 No.2 Westfield Grove and Penlan (Kingfield Green), Cedars (Kingfield Green) and Nut Cottage (Kingfield Green)

4.2 Impact on Penlan – ‘Privacy and Overbearing’

4.2.11 The fact that anyone will struggle to see through the trees currently in place (and to be supplemented by further new trees) means that an observer cannot see over the top of or through those trees to private gardens or a residence. We are more than 15m from the gable and Penlan’s windows are at 90 degrees to the proposals. This means that the development won’t pose any adverse impact on privacy or create any adverse overbearing effect.

4.2.12 Notwithstanding my unequivocal view expressed above, if for any reason the Inspector / Secretary of State deem it necessary then privacy could be improved even further if the window design reverts to an angled solution which will direct any windows outlook to looking south or north rather than towards Penlan. This feature was on a previous design iteration when the building was closer to the boundary.



FIGURE 128: Plan Showing possible angled Window Solution On Block 5 Elevation



FIGURE 130: Plan showing Current Design

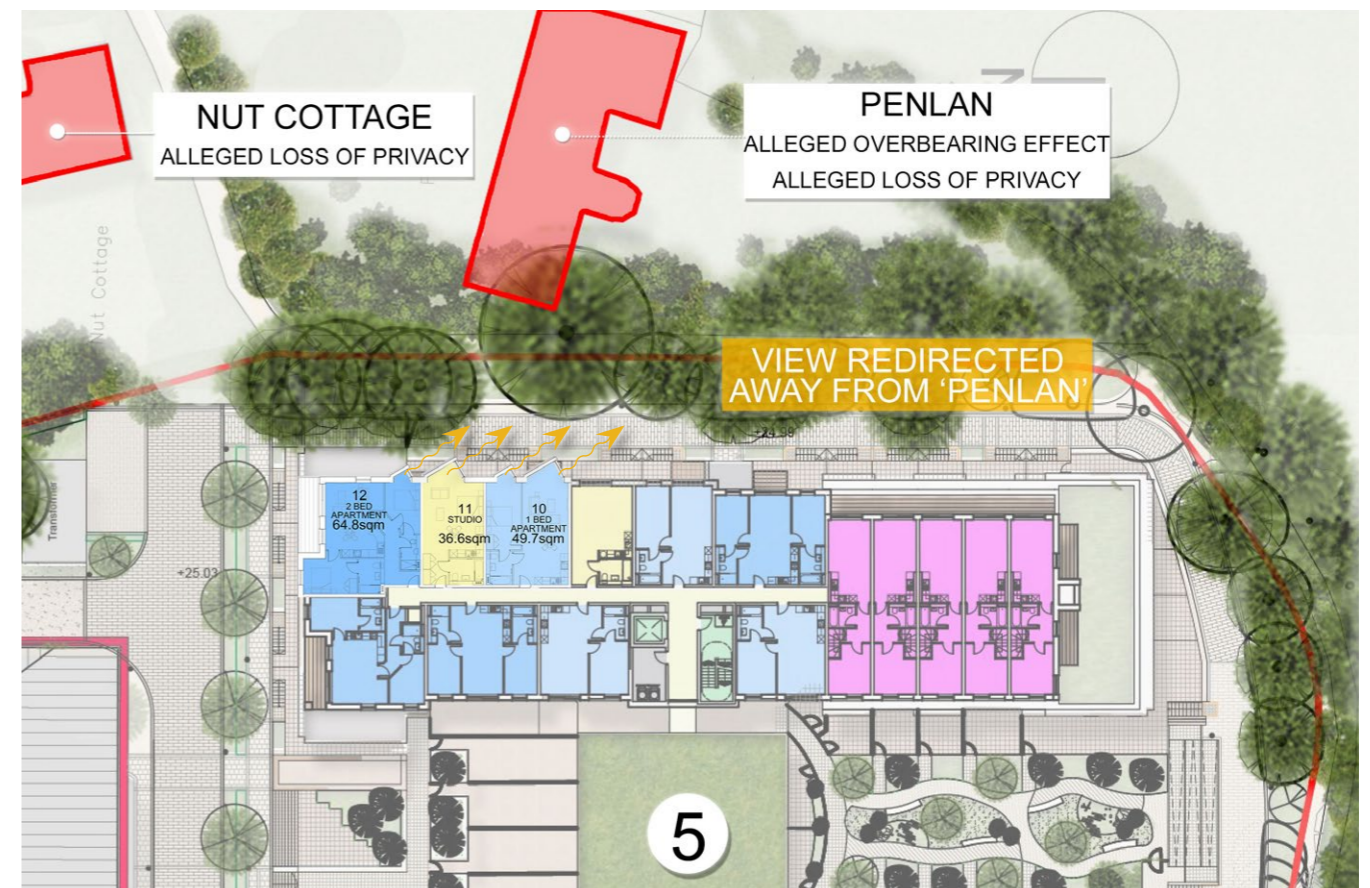


FIGURE 129: Plan showing possible angled Window Solution On Block 5 adjacent to Penlan

4.0 ARCHITECTURAL PROOF

4.0 No.2 Westfield Grove and Penlan (Kingfield Green), Cedars (Kingfield Green) and Nut Cottage (Kingfield Green)

4.2 Impact on Penlan – ‘Privacy and Overbearing’

4.2.13 This change could be controlled by a suitably worded planning condition in respect of the exact specification of window on this Proposed elevation.

4.2.14 This will affect the following plans:

- *LRW_7884_L(00)79P Proposed Ground Level (Colour)*
- *LRW_7884_L(00)80J Proposed First Floor (Colour)*
- *LRW_7884_L(00)81J Proposed Second Floor (Colour)*
- *LRW_7884_L(00)82K Proposed Third Floor (Colour)*
- *LRW_7884_L(00)83J Proposed Fourth Floor (Colour)*
- *LRW_7884_L(00)84K Proposed Fifth Floor (Colour)*
- *LRW_7884_L(00)156Q Block 5 - Ground Floor Plan-cad*
- *LRW_7884_L(00)157R Block 5 - First Floor Plan-cad*
- *LRW_7884_L(00)158Q Block 5 - Second Floor Plan-cad*
- *LRW_7884_L(00)159Q Block 5 - Third Floor Plan-cad*
- *LRW_7884_L(00)160Q Block 5 - Fourth Floor Plan-cad*
- *LRW_7884_L(00)161Q Block 5 - Fifth Floor Plan-cad*
- *LRW_7884_L(00)236C Proposed Street Scene Elevations Sheet 01*
- *LRW_7884_L(00)237C Proposed Street Scene Elevations Sheet 02*
- *LRW_7884_L(00)238C Proposed Street Scene Elevations Sheet 03*
- *LRW_7884_L(00)243E Block 5 Elevations*
- *LRW_7884_L(00)409A Block 5 Courtyard Elevations*
- *LRW_7884_L(00)67AA Proposed Ground Floor Plan-cad*
- *LRW_7884_L(00)68S Proposed First Floor Plan-cad*
- *LRW_7884_L(00)69U Proposed Second Floor Plan-cad*
- *LRW_7884_L(00)70T Proposed Third Floor Plan-cad*
- *LRW_7884_L(00)71S Proposed Fourth Floor Plan-cad*
- *LRW_7884_L(00)72U Proposed Fifth Floor Plan-cad*
- *LRW_7884_L(00)295A Block 5 Sections*
- *LRW_7884_L(00)513 Block 5 - Large Scale Design Details - Elevation A*
- *LRW_7884_L(00)514 Block 5 - Large Scale Design Details - Elevation A – Key*
- *LRW_7884_L(00)515 Block 5 - Large Scale Design Details - Elevation B*
- *LRW_7884_L(00)516 Block 5 - Large Scale Design Details - Elevation B - Key*

4.2.15 In fact the Outlook, Amenity, Privacy and Daylight SPD (July 2008) (CD4.12) has a whole section (5) on controlling privacy by outlook and thus understands that angled windows directing views/outlook is a solution to mitigate privacy. I would stress that we comply with the SPD's 15m identified distance currently anyway and this is an additional measure if deemed necessary.

4.0 ARCHITECTURAL PROOF

4.0 No.2 Westfield Grove and Penlan (Kingfield Green), Cedars (Kingfield Green) and Nut Cottage (Kingfield Green)

4.3 Impact on No.2 Westfield Grove – ‘Privacy and Overbearing’

4.3.00 This has similar significant dense and tall tree planting to its boundary. The trees are circa 12m to 17 tall (4 to 6 storeys high).



FIGURE 131: Aerial View showing Tree Boundary next to No.2 Westfield Grove.

4.0 ARCHITECTURAL PROOF

4.0 No.2 Westfield Grove and Penlan (Kingfield Green), Cedars (Kingfield Green) and Nut Cottage (Kingfield Green)

4.3 Impact on No.2 Westfield Grove – ‘Privacy and Overbearing’

4.3.01 Westfield Grove has its rear windows looking towards the boundary but the closest of those are circa 17m to the boundary and 20m to the building edge (no windows) and 21m to the closest window. Block 4 only has a single apartment at its end opposite to No.2 Westfield Grove.

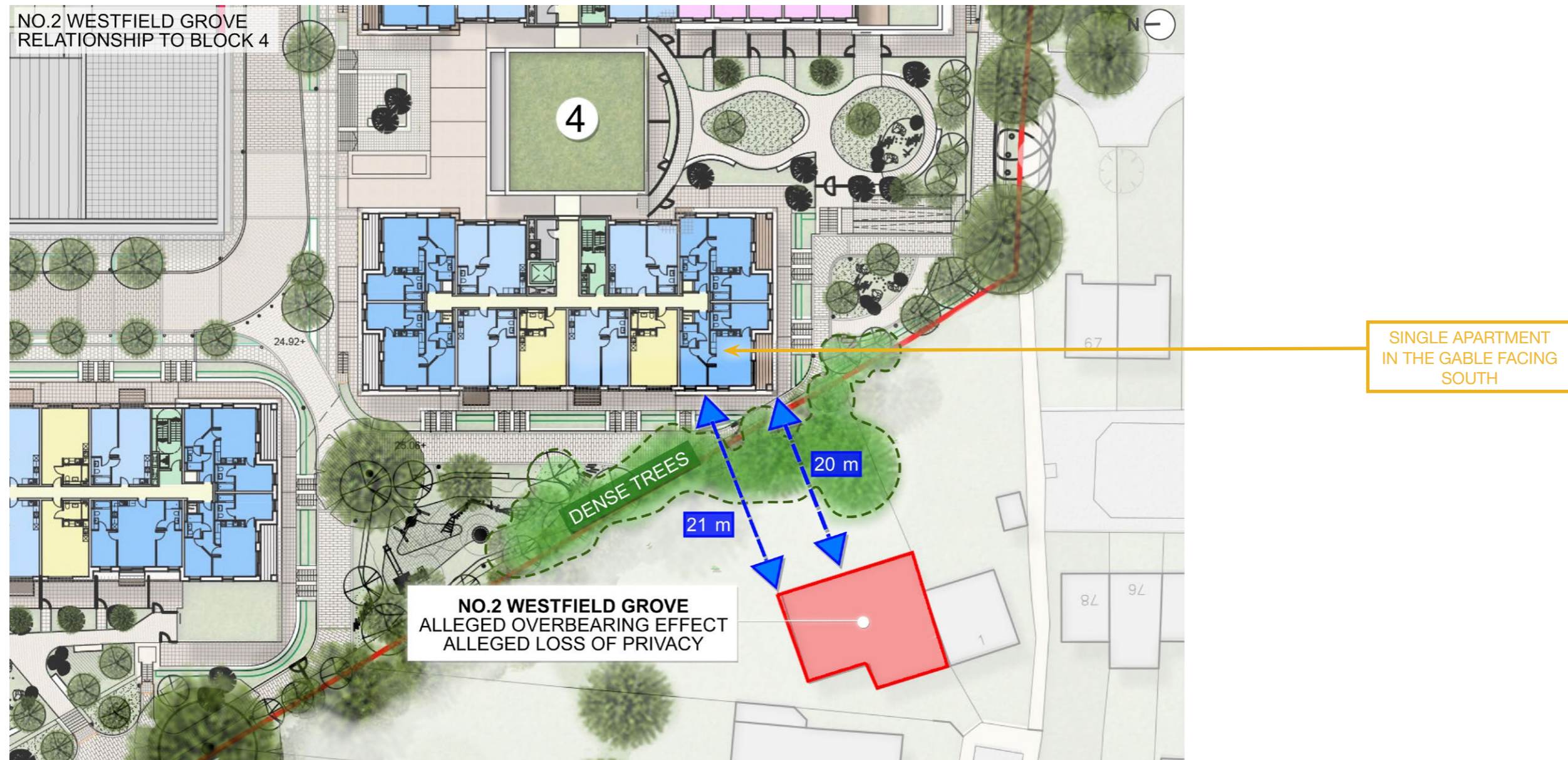


FIGURE 132: Diagram Showing Distances between Block 4 and No.2 Westfield Grove

4.0 ARCHITECTURAL PROOF

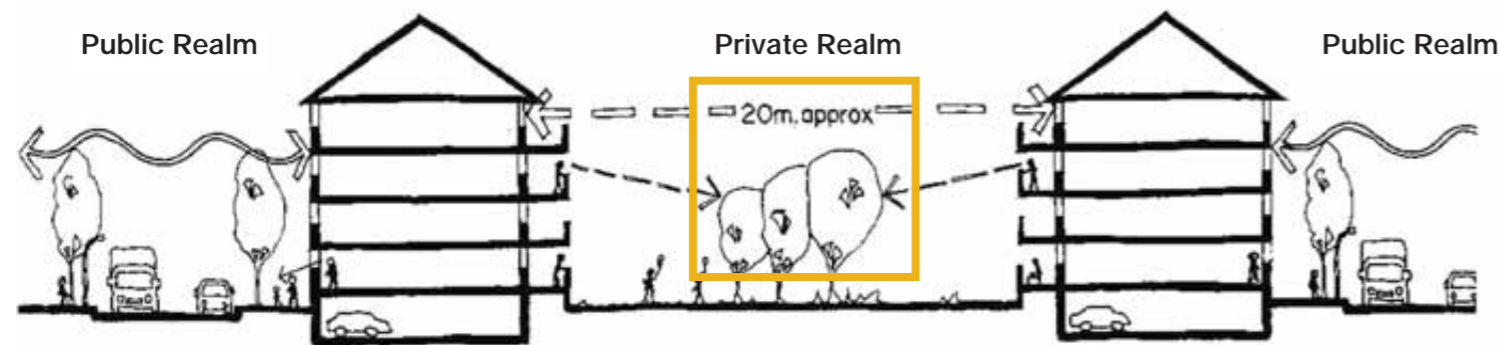
4.0 No.2 Westfield Grove and Penlan (Kingfield Green), Cedars (Kingfield Green) and Nut Cottage (Kingfield Green)

4.3 Impact on No.2 Westfield Grove – ‘Privacy and Overbearing’

4.3.02 The SPD as Outlook, Amenity Privacy and Daylight SPD (2008) (CD4.12) suggests a standard 30m distance as already identified but this can be relaxed where landscaping is between or the buildings are at an angle to the property.

4.3.03 We have met both these ‘mitigating’ criteria – landscape buffer **AND** building at an angle

4.3.04 There is therefore a strong argument supported by the SPD as Outlook, Amenity Privacy and Daylight SPD (2008) (CD4.12) that the separation distance should be deemed to apply where there are no direct facing windows, which should be considered to be 20m which we satisfy.



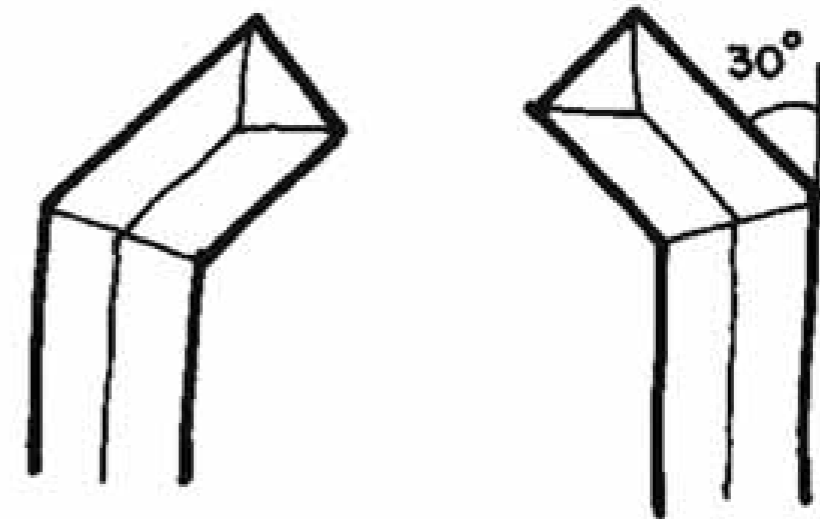
Extracted from: Outlook, Amenity Privacy and Daylight SPD (2008) Page 17 Fig 16

FIGURE 133: Effective Screening can be used to Achieve Privacy at Reduced Separation Distances

5.12 Separation distances may be relaxed by about one quarter where there is a significant change of angle of orientation between the siting of dwellings opposite (over 30 degrees).

Extracted from: Outlook, Amenity Privacy and Daylight SPD (2008) Page 16

FIGURE 134: Change In Angle of Orientation



Separation distances may be relaxed where there is a significant change in building orientation.

Extracted from: Outlook, Amenity Privacy and Daylight SPD (2008) Page 16 Fig 15

FIGURE 135: Change In Angle of Orientation

4.0 ARCHITECTURAL PROOF

4.0 No.2 Westfield Grove and Penlan (Kingfield Green), Cedars (Kingfield Green) and Nut Cottage (Kingfield Green)

4.3 Impact on No.2 Westfield Grove – ‘Privacy and Overbearing’

4.3.05 The Proposed building end apartment near this boundary has its principal living room windows located inset from the end and deliberately designed to look out in a direction (south) that does not face No.2 – it even has a flank brick screen to minimise views towards No.2.

4.3.06 On this basis the windows do not need to comply with the Outlook, Amenity Privacy and Daylight SPD (2008) (CD4.12) since we exceed 15m separation distance (figure 136).

4.3.07 On the west facing elevation more angled towards the garden of No.2, block 4 has several west facing windows. These are bedroom windows and not principal living room windows and do not directly overlook the property.

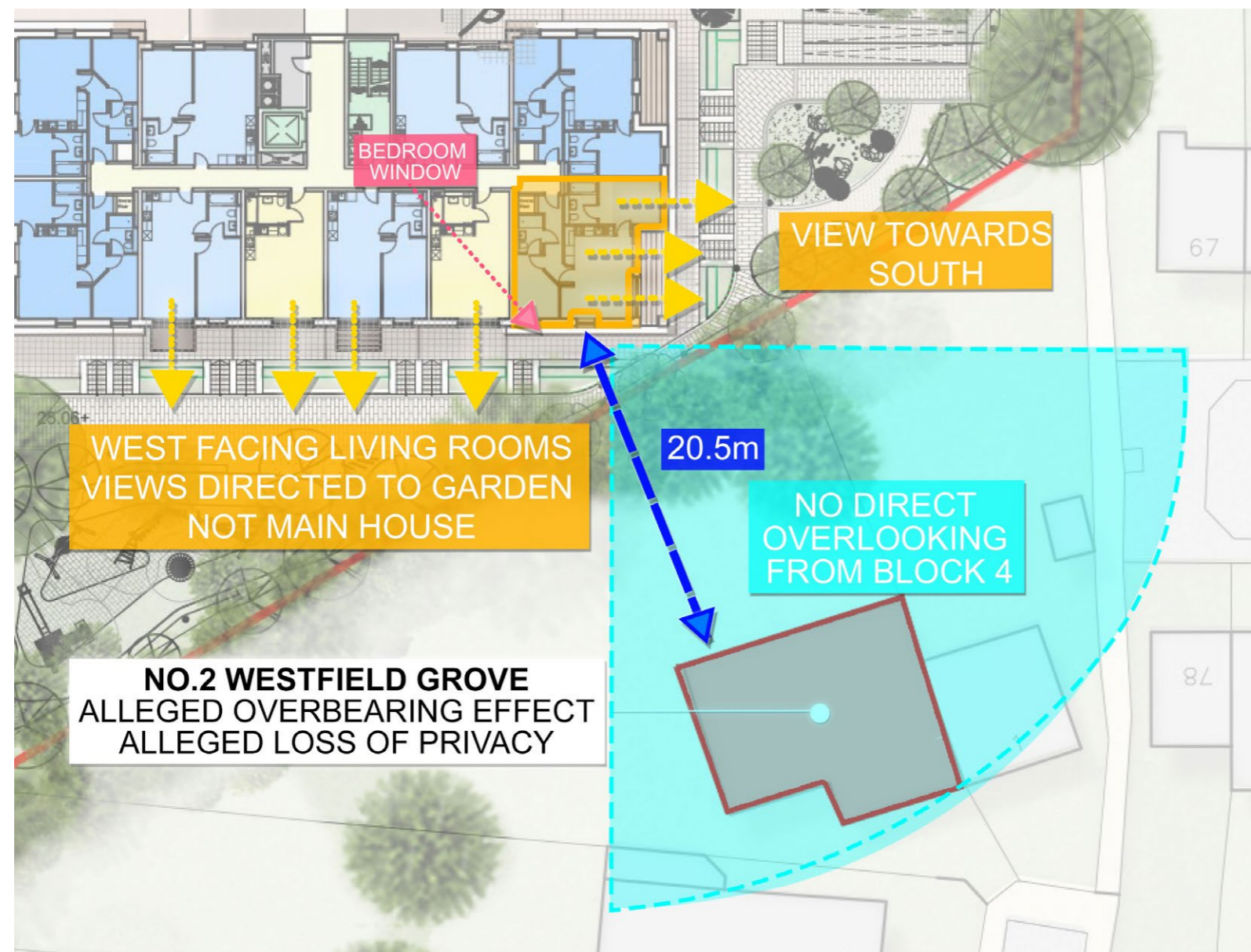


FIGURE 136: South Facing Windows on Block 4

4.0 ARCHITECTURAL PROOF

4.0 No.2 Westfield Grove and Penlan (Kingfield Green), Cedars (Kingfield Green) and Nut Cottage (Kingfield Green)

4.3 Impact on No.2 Westfield Grove – ‘Privacy and Overbearing’

4.3.08 These West facing windows also face an existing dense landscape buffer between them and the garden of No.2. These are bedrooms and not principal habitable rooms and do not look directly towards the No.2 and are screened dense by landscape.

4.3.09 These separation distances between windows are 21m at their closest, quickly moving to 37m or 47m - see diagram below. The Outlook, Amenity, Privacy and Daylight (2008) (CD4.12) SPD identifies 30m separation distances that reduce to 20m when a building is angled and has windows directed in a different direction or has landscape between to reduce impacts. Clearly we satisfy all of these so at 21m between windows there should be no loss of privacy to No.2 Westfield Grove.

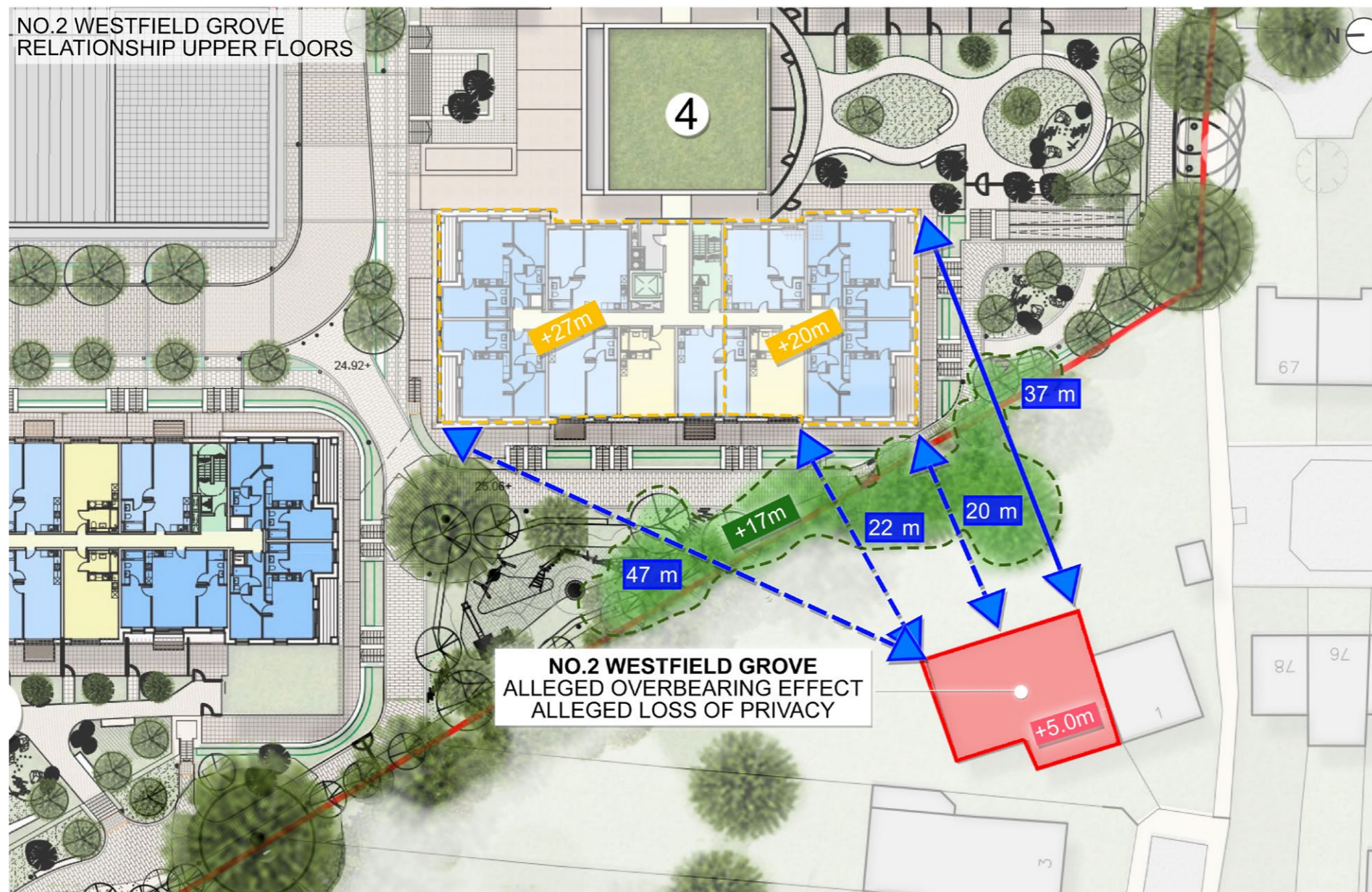


FIGURE 137: Plan Showing Distances of Block for Compared to No.2 Westfield Grove

4.0 ARCHITECTURAL PROOF

4.0 No.2 Westfield Grove and Penlan (Kingfield Green), Cedars (Kingfield Green) and Nut Cottage (Kingfield Green)

4.3 Impact on No.2 Westfield Grove – ‘Privacy and Overbearing’

4.3.10 In the same way I considered an option to further mitigate any impacts earlier in relation to Penlan, if felt necessary the Inspector/ Secretary of State could consider the same design alteration for No.2 Westfield Grove. Clearly block 4 as designed already mitigates outlook by design and doesn't directly overlook No.2 Westfield Grove so these measures may not be needed. However if felt necessary the changes are illustrated in Figs 138, 139 and 140.

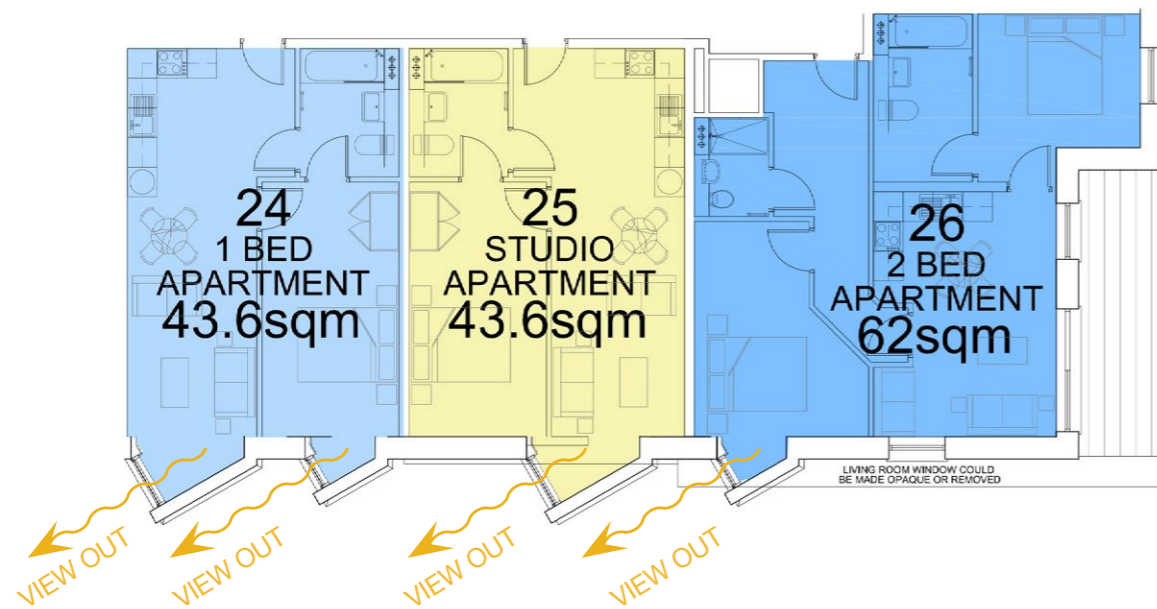


FIGURE 138: Plan showing possible angled Window Solution on Block 4 Elevation



FIGURE 139 Plan showing Current Design

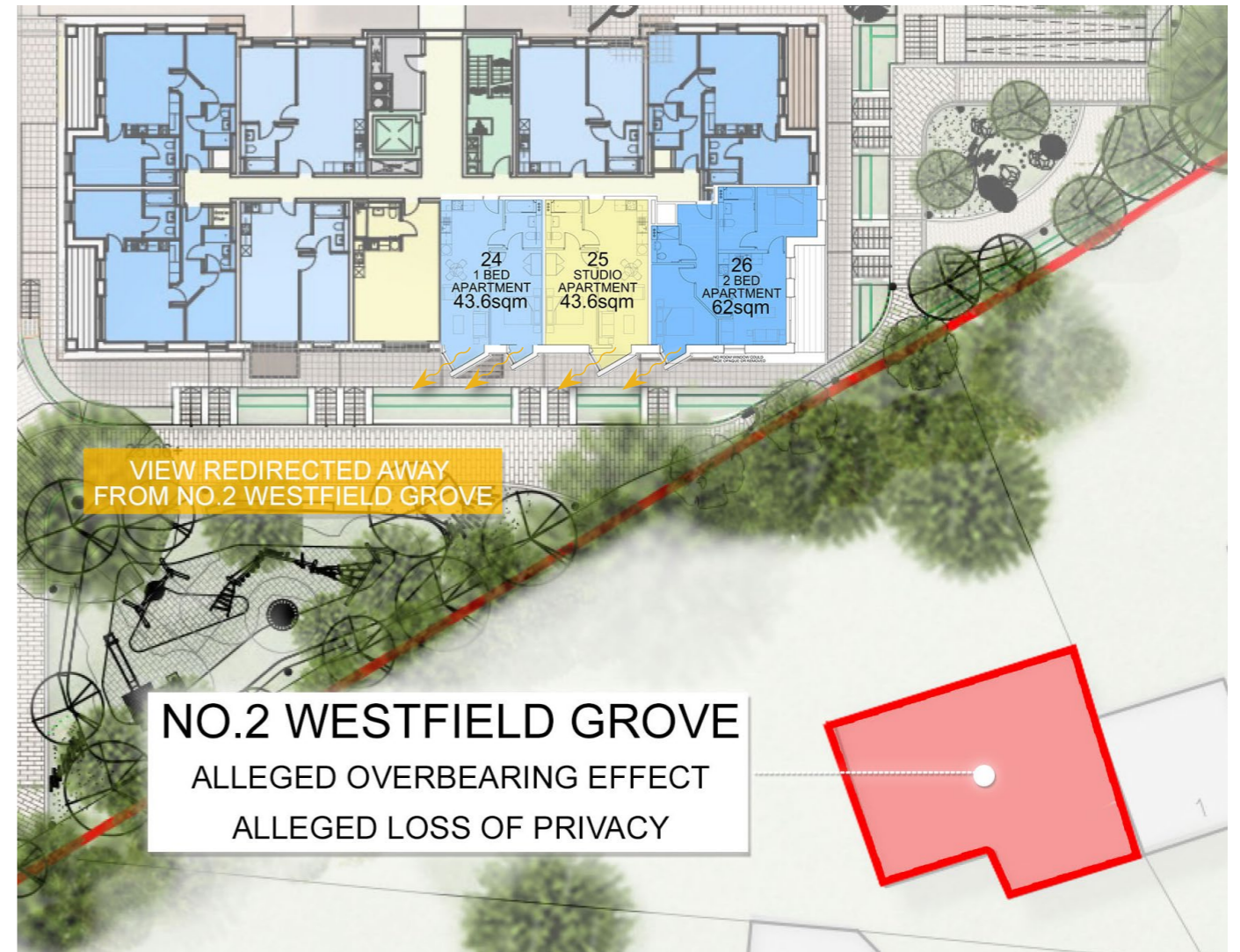


FIGURE 140: Plan showing possible angled Window Solution on Block 5 adjacent to No.2 Westfield Grove

4.0 ARCHITECTURAL PROOF

4.0 No.2 Westfield Grove and Penlan (Kingfield Green), Cedars (Kingfield Green) and Nut Cottage (Kingfield Green)

4.3 Impact on No.2 Westfield Grove – ‘Privacy and Overbearing’

4.3.11 This would affect the followings drawings:

- *LRW_7884_L(00)79P Proposed Ground Level (Colour)*
- *LRW_7884_L(00)80J Proposed First Floor (Colour)*
- *LRW_7884_L(00)81J Proposed Second Floor (Colour)*
- *LRW_7884_L(00)82K Proposed Third Floor (Colour)*
- *LRW_7884_L(00)83J Proposed Fourth Floor (Colour)*
- *LRW_7884_L(00)84K Proposed Fifth Floor (Colour)*
- *LRW_7884_L(00)145N Block 4 - Ground Floor Plan-cad*
- *LRW_7884_L(00)146N Block 4 - First Floor Plan-cad*
- *LRW_7884_L(00)147N Block 4 - Second Floor Plan-cad*
- *LRW_7884_L(00)148N Block 4 - Third Floor Plan-cad*
- *LRW_7884_L(00)149N Block 4 - Fourth Floor Plan-cad*
- *LRW_7884_L(00)150N Block 4 - Fifth Floor Plan-cad*
- *LRW_7884_L(00)242E Block 4 Elevations*
- *LRW_7884_L(00)408A Block 4 Courtyard Elevations*
- *LRW_7884_L(00)236C Proposed Street Scene Elevations Sheet 01*
- *LRW_7884_L(00)237C Proposed Street Scene Elevations Sheet 02*
- *LRW_7884_L(00)238C Proposed Street Scene Elevations Sheet 03*
- *LRW_7884_L(00)416 View looking South from new street towards Block 3 and 4*
- *LRW_7884_L(00)67AA Proposed Ground Floor Plan-cad*
- *LRW_7884_L(00)68S Proposed First Floor Plan-cad*
- *LRW_7884_L(00)69U Proposed Second Floor Plan-cad*
- *LRW_7884_L(00)70T Proposed Third Floor Plan-cad*
- *LRW_7884_L(00)71S Proposed Fourth Floor Plan-cad*
- *LRW_7884_L(00)72U Proposed Fifth Floor Plan-cad*
- *LRW_7884_L(00)294A Block 4 Sections*
- *LRW_7884_L(00)509 Block 4 - Large Scale Design Details - Elevation A*
- *LRW_7884_L(00)510 Block 4 - Large Scale Design Details - Elevation A – Key*
- *LRW_7884_L(00)511 Block 4 - Large Scale Design Details - Elevation B*
- *LRW_7884_L(00)512 Block 4 - Large Scale Design Details - Elevation B - Key*

4.0 ARCHITECTURAL PROOF

4.0 No.2 Westfield Grove and Penlan (Kingfield Green), Cedars (Kingfield Green) and Nut Cottage (Kingfield Green)

4.3 Impact on No.2 Westfield Grove – ‘Privacy and Overbearing’

4.3.12 In relation to overbearing the Outlook, Amenity, Privacy and Daylight SPD (2008) (CD4.12) sets out in Para 3.4 Page 7 an example of overbearing impact.

4.3.13 The test for overbearing is highlighted in para 3.3 and 3.4 and fig 2 and 3 of the SPD. This essentially says a structure is overbearing when its height exceeds the width/separation distance from a window - see diagrams below.

4.3.14 No.2 Westfield Grove has existing trees that are at a greater height than the distance to the dwelling so the property already suffers from an overbearing effect.



FIGURE 141: Aerial View showing Tree Boundary next to No.2 Westfield Grove.



FIGURE 142: Aerial View showing Tree Boundary next to No.2 Westfield Grove.



Extracted from: Outlook, Amenity Privacy and Daylight SPD (2008) Page 7 Fig 3

FIGURE 143: Diagram illustrating examples of outlooks and separation distances from SPD

3.4 Outlook from a principal window will generally become adversely affected when the height of any vertical facing structure exceeds the separation distance from the window. When a structure is placed too close to a window so that it completely dominates the outlook it will have an **overbearing impact** (please see Fig.3 overleaf).

Extracted from: Outlook, Amenity Privacy and Daylight SPD (2008) Page 7

FIGURE 144: Text extracted from SPD

4.0 ARCHITECTURAL PROOF

4.0 No.2 Westfield Grove and Penlan (Kingfield Green), Cedars (Kingfield Green) and Nut Cottage (Kingfield Green)

4.3 Impact on No.2 Westfield Grove – ‘Privacy and Overbearing’

4.3.15 In this instance the existing trees already have a ‘overbearing’ albeit marginal overbearing impact and our new building sits on the other side of those.

4.3.16 As the Outlook, Amenity, Privacy and Daylight SPD (2008) (CD4.12) para 3.4 states we would need to exceed the height for the separation distance between our new building and the property. The development does not. In addition to satisfying the guidance at our closest point the overbearing calculation improves rapidly in our favour with the increasing distance as the new building is angled away from No.2 - see figures below.

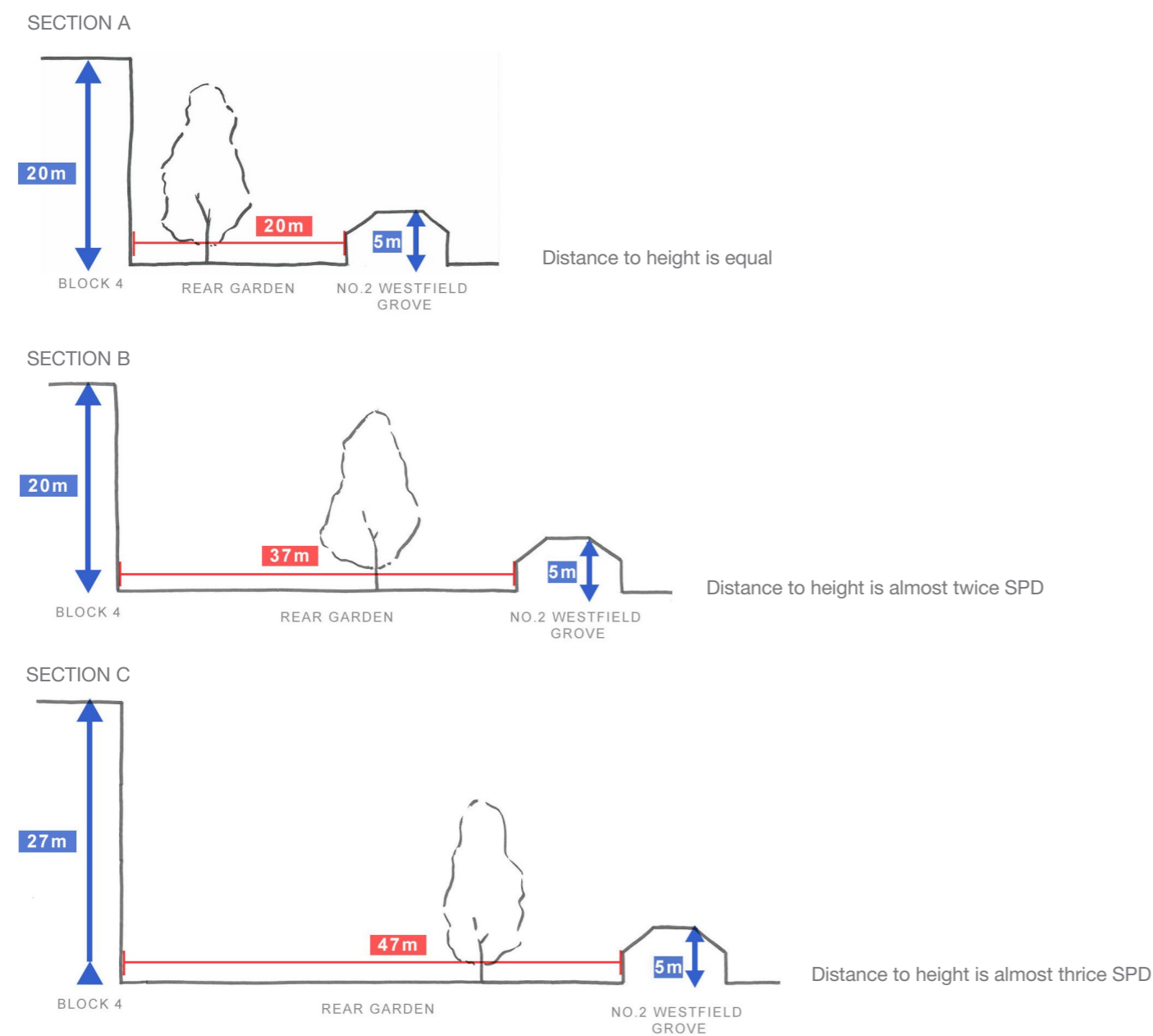


FIGURE 145: Block 4 to No.2 Westfield Grove Section



FIGURE 146: Key identifying sections opposite taken through No.2 Westfield Grove and block 4

4.0 ARCHITECTURAL PROOF

4.0 No.2 Westfield Grove and Penlan (Kingfield Green), Cedars (Kingfield Green) and Nut Cottage (Kingfield Green)

4.3 Impact on No.2 Westfield Grove – ‘Privacy and Overbearing’

4.3.17 Therefore we have a 20m building positioned 20m away. Looking at the Outlook, Amenity, Privacy and Daylight SPD (2008) (CD4.12) test (para 3.4) we are not ‘overbearing’ as the Proposal is **not** taller than the separation distance.

4.3.18 We also have between us and No.2 a 3 to 5 storey landscape buffer that already clearly has an overbearing impact.

4.3.19 On that basis I do not concur with the reason for refusal by way of overbearing affect.



5.0 Conclusion.

5.0 CONCLUSION

5.0.00 Overall, I commend the approach taken to the design of the Proposal. The response to the brief to provide a new destination in the town anchored on a new football stadium creates a fresh character for the site, its own townscape and streetscape. The Proposal on its edges respects the existing townscape and streetscape and surrounding largely post war or modern character of the area. Woking is a town characterised by taller buildings and the site is well related to the town centre and generates an opportunity for a further cluster of taller buildings albeit a modest 3-11 storeys in the context of the town as a whole.

5.0.01 Density is simply a consequence of the overall scale, massing and design of the Proposals. It is not a harm in-itself. The Proposal demonstrates a coherent and robust design narrative which was commended at design review panel and by officers during the evolution. It would represent a significant enhancement over the present baseline quasi industrial and discordant character and provide high quality contemporary architecture with public realm, roof gardens and additional street trees anchored on the principal street leading from Kingfield Road.

5.0.02 I concur with the Committee Report and conclusions in all respects save the conclusions on the impact on No.2 Westfield and Penlan. Were the Inspector/ Secretary of State minded to consider any harm arose this could be controlled by the imposition of a planning condition and should be weighed in the overall planning balance on the basis of the quality of the Proposal and benefits arising.

5.0.03 I firmly believe planning permission should be granted for both schemes.

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