



Town & Country Planning Act 1990

APPEAL UNDER SECTION 78(1)

By

Mr Anthony Hardy (Capital Community Developments LTD)

At

Land North of Gardenia Close and Garden Square

Rendlesham

Suffolk

Planning Inspectorate Ref: APP/X3540/W/19/3242636

ESC Ref: DC/19/1499/FUL

Proof of Evidence

of

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Principal Design and Conservation Officer

2nd March 2020

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Contents

- 1.0 Qualifications and experience**
- 2.0 Scope of evidence**
- 3.0 National policy and national and local guidance**
- 4.0 Brief description of appeal layout**
- 5.0 Uniformity of layout**
- 6.0 Pattern of roads**
- 7.0 Permeability and connectivity**
- 8.0 The character of streets and spaces**
- 9.0 Comments on Building for Life 12 Assessment at Appendix X of Appellant's Statement of Case**
- 10.0 Conclusion**

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1.0 Qualifications and experience

- 1.1 My name is Robert Scrimgeour. I am a Chartered Town Planner and a Chartered Architect. I am a Full Member of the Institute of Historic Building Conservation and I have a postgraduate Certificate in Urban Design (with Merit).
- 1.2 I am employed by East Suffolk Council as its Principal Design and Conservation Officer as part of the 3-strong Design and Conservation team within the Planning and Coastal Management department. I have been employed in my current role since June 2015 and previously was employed as the Senior Design and Conservation Officer with Suffolk Coastal District Council (predecessor to East Suffolk Council) since 2007.
- 1.3 My role includes assisting Development Management officers and Major Sites planning officers in negotiating pre-applications and applications for medium to large scale residential development including with national housebuilders, with particular regard to aspects of design such as layout, architecture and context.

2.0 Scope of evidence

2.1 The appeal is against the decision of East Suffolk Council (the Council) to refuse planning permission for a phased residential development of 75 dwellings, car parking, public open space, hard and soft landscaping and associated infrastructure and access at Land north of Gardenia Close and Garden Square, Rendlesham, Suffolk.

2.2 The application was refused by delegated decision and the decision notice was issued on the 8th July 2019 **[CD3.2]**.

2.3 Upon receipt of this appeal I was allocated the responsibility to act as a design witness for the appeal. Prior to the appeal I had no previous involvement in the planning application or this site. Another member of the Design and Conservation team, Eloise Limmer, provided design advice to the case officer at the time of the planning application, but I did not oversee her comments.

2.4 The formal decision notice gave the following reason for refusal on the basis of design (no.3):

The development is not in accordance with paragraph 127 and 129 of the NPPF, Policy DM21 of the East Suffolk – Suffolk Coastal District Local Plan – Core Strategy and Development Management Development Plan Document (adopted July 2013) and national design guidance in the form of Building for Life 12 (2015) which require a development to create a socially inclusive development through a well designed and safe built environment. Policy DM21 and Policy DM22 of the Core Strategy also require that any development creates a safe space that is well related to the scale and character of their surroundings, gives attention to the form, scale and landscape of the spaces between buildings and the boundary treatment of individual sites and reduce the amount of car use within a site. The development includes a number of elements of poor design, in that it fails to create well laid out streets and its layout would create features, barriers and exposed spaces and boundaries which would not form a safe and socially interactive development.

2.5 I have reviewed the third reason for refusal. I have also reviewed the Report for Delegated Planning Application and the comments of relevant consultees including those of the Designing Out Crime Officer of the Suffolk Constabulary **[CD9.4]**. Although

I agree with some of the views expressed by him, others are contrary to what I judge to be good urban design, such as his support for frontage parking for most plots and a desire to limit permeability and connectivity.

- 2.6 Bearing in mind my evidence is designed to assist the Inspector with the reason for refusal and the determination of the appeal, I focus in this proof of evidence on my own analysis and critique of the appeal layout which concludes that the proposals do not accord with what I judge to be the precepts of good design based on my professional experience and policy and guidance provided at national level.
- 2.7 The evidence which I have prepared and provide for this appeal reference APP/X3540/W/19/3242636 (in this proof of evidence) is true and has been prepared and is given in accordance with the guidance of my professional institutions and I confirm that the opinions expressed are my true and professional opinions.

3.0 Local and National policy and guidance

- 3.1 The Development Plan contains design policies including DM21 – Design: Aesthetics, and DM22 - Design: Function. These are addressed in Ben Woolnough’s planning proof of evidence. The NPPF is a material consideration both in plan making and decision taking. Section 12 on ‘Achieving well-designed places’ is particularly relevant to this appeal; as is Section 8 on ‘Promoting healthy and safe communities’ **[CD9.1]**.
- 3.2 Also of relevance to this appeal is the National Design Guide (September 2019) which was published after the decision was issued but is a material consideration for this appeal**[CD9.2]**; and Building for Life 12 both the 2015 **[CD9.3a]** and 2018 **[CD9.3b]** editions. This guidance provides support to the NPPF that is relevant to design quality. It is not the only guidance available but I judge it to be the most pertinent to this appeal. This is because the National Design Guide is the most recent published guidance (at national level) and outlines and illustrates the Government’s priorities for well-designed places in the form of ten characteristics. Building for Life 12 is relevant because it was used as an assessment tool by the Council in forming its views on the design quality of the planning application; and has been used by the appellant for inclusion within their Statement of Case. Building for Life 12 is also an accepted design tool in the merging Suffolk Coastal Local Plan.
- 3.3 I note that the National Design Guide in its list of key references at p57 refers to the 2015 edition of Building for Life, despite post-dating the 2018 edition; as does the most recent edition of the NPPF (February 2019). The appellant has used the 2018 edition. A co-sponsor of Building for Life, the Design Council, still hosts the 2015 version on its website and this is confirmation that it has not been superseded.
- 3.4 Despite reference in the National Design Guide at paragraph 10 (p3) to the setting out of specific, detailed and measurable criteria for good design at local level in the form, for example, of local authority design guides, it should be noted that there are no up-to-date local design guides authored by East Suffolk Council that are relevant to the appeal. The Suffolk Design Guide (revised 2000) and Suffolk Coastal District Council’s

Supplementary Planning Guidance no.7 on the Location and Design of Small Residential Developments (1993) are no longer used due to their age.

- 3.5 Alongside the proof of evidence prepared by the Council's planning expert witness, I will also consider the criteria of the adopted Local Plan policies seeking good design along with design policies in the emerging Suffolk Coastal Local Plan.

Figure 1: Site Plan (Appeal Drawing E18836-001)

5.0 Uniformity of layout

- 5.1 It is my judgment that the principal approach to the design of the appeal layout is both rigid and uniform: specifically, the uniform application of a grid pattern, the uniform application of culs-de-sac, the uniform orientation of the principal elevations of the dwellings, a uniform approach to building typology and associated plot sizes i.e. detached buildings of similar form on individual plots, only, and a uniform approach to parking provision i.e. predominantly frontage parking. Such an approach has resulted in a design of poor quality and ignores what I judge, in my experience, to be some of the usual considerations that determine layout. For example, how the layout responds to and respects the site's context and characterisation; how points of access are used to generate a movement framework; and how streets and spaces should be positively characterised. These considerations appear to have been set aside in favour of the application of a fixed idea of design.
- 5.2 Such a design approach ignores contextual opportunities and appears site-unresponsive and repetitive. For example, every short streetscene along each single-sided cul-de-sac is near-identical in character – 3 or 4 detached buildings in individual plots with associated frontage parking all facing in the same direction with an outlook onto 2m high close-boarded fencing. Differentiation through use of terraces (for example), different kinds of streets and parking arrangements, and integrated routes and open spaces has been minimised and variety is largely absent. The result is that legibility through the layout and street character are poor.
- 5.3 The effects of what I have described as a rigid design approach to the layout are amplified below in consideration of road pattern, permeability and connectivity, and the character of streets and spaces.

6.0 Pattern of roads

- 6.1 The grid pattern of the layout that has been imposed on the site provides a rigid geometry that consists of multiple dead-end routes, or culs-de-sac, that are mostly positioned at right angles off the main linear axial route. Indeed, all dwellings are shown positioned and accessed off a cul-de-sac, with only a few exceptions at plot no.s 1,2,3 and 18. This pattern means that none of these roads connect with each other. The result will be a uniform road pattern that lacks good connectivity across the site with the effect that the layout will be inwards-looking with each cul-de-sac self-contained and separated off from its neighbours. The avoidance of conventional back-to-back garden plots has added to the number of culs-de-sac required, a point made by the Designing Out Crime Officer at paragraph 2.0 (a) (p2).
- 6.2 This effect appears to be a principal design driver – the creation of private dead-end streets – across the entire layout and is one of the key aspects of its poor design. It should be noted that the National Design Guide at paragraph 82 (p23) states that *'...culs-de-sac will generally only be appropriate at the most local level where there is little vehicular movement'*. Nearly all 75 dwellings on the appeal layout are served by culs-de-sac which will involve more than a little vehicular movement, and this chosen pattern of disconnected streets is incompatible with a well-designed movement network.

Road layout and hierarchy

- 6.3 The road layout will be a principal organising feature of the scheme design, connecting existing access points and providing a hierarchy of routes, as illustrated in the appellant's Statement of Case at p24 of Appendix X iv. The appeal layout illustrates a main road connecting access points from adjacent development at Tidy Road and Garden Square. Off this is a 'secondary route' that actually forms the principal organising axis of the layout which is oriented in an east-west direction along a key position at the centre of the site (and following its main direction). Off this secondary

route are more culs-de-sac than those off what is designed as the main road (7 as opposed to 4).



Figure 2: Road hierarchy diagram from Appellant's Building for Life 12 assessment

6.4 That this organising axis does not also form the actual principal route along its full length, despite serving as the main distributor route, is contradictory. This axial route, itself, leads to nowhere in particular and its importance is not signified by the design of dwellings placed along it nor their orientation nor by its edge treatment which consists of fences, hedges and isolated parking spaces. It is without footpaths either side of the highway. Its designed status as a non-adopted secondary route – despite it being the main distributor road – makes it equal in importance in the road hierarchy to the western route from the Tidy Road access which only serves two dwellings.

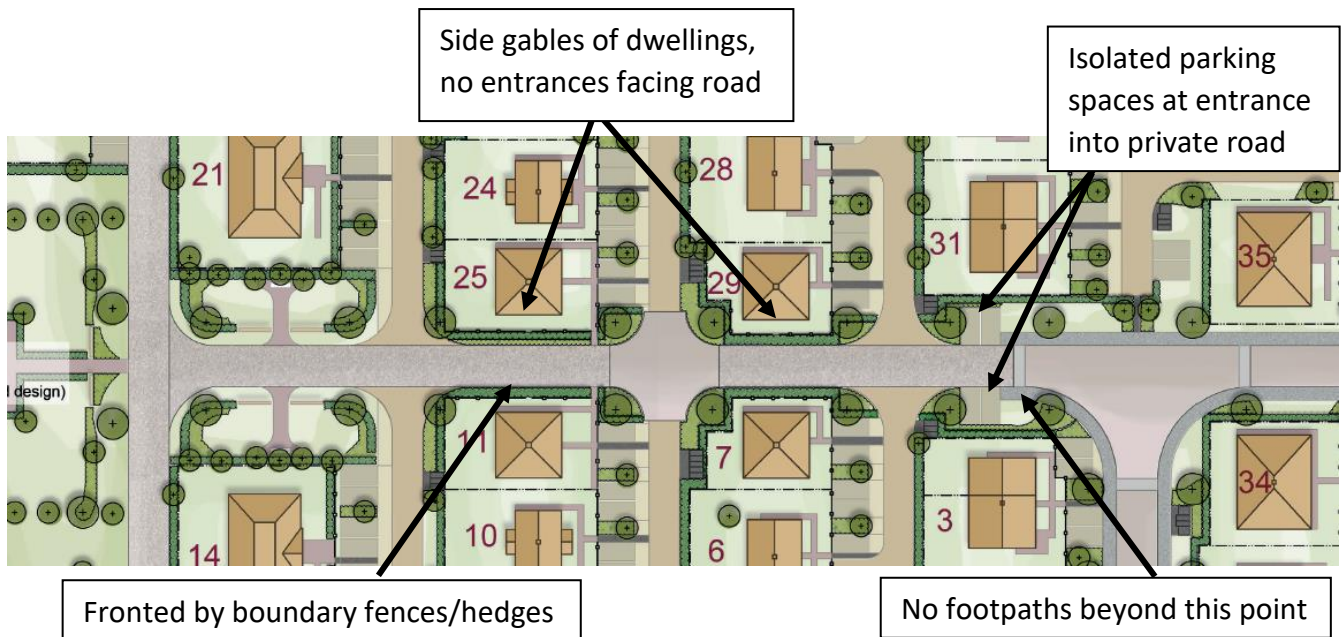


Figure 3: Extract from Site Layout Plan showing treatment along secondary route

- 6.5 Further, it is noteworthy that the only differentiation in road treatment between the main route and the secondary route along the principal site axis is the use of footpaths either side of the main route. Otherwise, the main road is treated in a closely similar way to the axial secondary route – dwellings placed side on to it and edged with high fences and hedges.
- 6.6 The effect of the principal axial route being designed as a secondary route and similar in treatment to what is the designed main route is that the road layout will lack clarity in terms of its hierarchy of use.

7.0 Permeability and connectivity

- 7.1 The layout suffers from an under-provision of footpaths across the site, the lack of which reinforces the poor connectivity, self-containment and separation that arise from the pattern of roads. It is notable that the only public footpaths provided for are along the length of the connecting route between Tidy Road and Garden Square. No footpaths are provided elsewhere within the layout that would provide safe and comfortable access from all dwellings to, for example, the two principal public open spaces in the western and north-eastern areas of the site; the play area to the immediate north of plot no.35; and out of the site to access local services including the school, surgery and shops.
- 7.2 Other than the east-west footpaths between apartment blocks no.s 12 + 14 and 20 + 21, it is also notable that there are no east-west footpath connections that follow the principal orientation of the site and which would allow for safe routes across the site connecting, for example, the open spaces or between areas of the development.
- 7.3 The National Design Guide at paragraph 76 (p22) states that a well-designed movement network defines a clear pattern of streets that *'limits the impacts of car use by prioritising and encouraging walking (and) cycling...'*. The central axis and culs-de-sac are not of a standard or design which would lead to their adoption by the Highways Authority. They are a range of private roads and accesses. That the layout fails to make this most basic of footpath provision for the benefit of all future residents is a significant failure; as is the overall effect that is provided of a layout that is dominated by provision for the vehicle in the absence of a comprehensive network of connected footpaths. Policy DM22 Design: Function, requires the design and layouts of development to provide and maintain safe and convenient access for people with disabilities (and in covering this specific accessibility need, all users also).
- 7.4 The lack of comprehensive footpath provision and pedestrian integration combined with a road pattern that facilitates the provision of culs-de-sac and no other form of layout, contributes to the poor permeability and connectivity of this layout. Even where footpaths have been provided to connect the ends of culs-de-sac adjacent plot no.s 1, 4 and 8, these appear to be via private drives, are private in character and are

edged variously by garages, parking spaces, high fences, hedges and spaces of indeterminate use which undermine their safety and likely use as a desire line through the development. The point about safety is also made by the Designing Out Crime Officer in his comments at paragraph 2.0 (h) (p3).



Figure 4: Extract from Site Layout Plan showing the footpath connections at the end of the culs-de-sac

7.5 The character of culs-de-sac is such that they are intended to appear as private dead-ends into which no invitation for use is extended to those other than residents, and the viability of these narrow, enclosed routes is, therefore, doubtful. Further, their uninviting character is emphasised by the fact that all of them are edged on one side by 2m high close boarded fences. As private drives serving small groups of dwellings they will not be adopted highway so right of public access through the end paths cannot be assumed by future residents and as a planning consideration.

7.6 The lack of permeability and connectivity results in a layout that appears to spurn the opportunity for social spaces, chance encounters between residents and neighbours, and the life outside of private space that provides community. This is contrary to the National Design Guide at paragraph 76 (p22) that states that a well-designed movement network defines a clear pattern of streets that '*promotes activity and*

interaction, contributing to health, well-being, accessibility and inclusion' and where well-designed homes and buildings *'relate positively to the private, shared and public spaces around them, contributing to social interaction and inclusion'* (paragraph 123, p38). This human perception of space and communities is built upon in the Council's planning expert witness' proof of evidence.

8.0 The character of streets and spaces

- 8.1 The appeal layout has been designed primarily around a fixed idea of a grid pattern of culs-de-sac with insufficient regard paid to the creation of attractive, positively designed street character or the full influence of the surrounding street pattern. Street character is the result of considerations that include how the street is used, how it is enclosed and what it contains. Well-designed streets in a residential layout should function as key spaces of social interaction, as well as transit spaces and can be public or private in character dependent upon their place in the layout hierarchy. The use of private single-sided culs-de-sac as the principal street typology and as the main organising feature of the layout, and the uniform orientation of dwellings on them, mean that these streets ignore their relationship to what appear to be principal routes – the main route from Tidy Road to Garden Square and the principal axial east-west route.
- 8.2 For example, the principal access into the appeal layout via Tidy Road (which provides pedestrian and vehicular access and is the primary interface with the existing community) is presented with a vista of a single storey dwelling hidden behind a 2m high close-boarded wooden fence and the back-ends of three culs-de-sac backing onto a primary arrival into the site. The effect of this signals the character of this public street i.e. unwelcoming and without positive visual appeal. Traversing this main route eastwards, it is possible to see that it is enclosed, not by front gardens and active dwelling frontages providing safe outlook, but primarily by side and rear elevations and high 2m boundaries. The resultant street character will be unwelcoming and of poor quality. Where plot no.s 1-3 do face directly onto this street, their frontage will be dominated by parked vehicles.

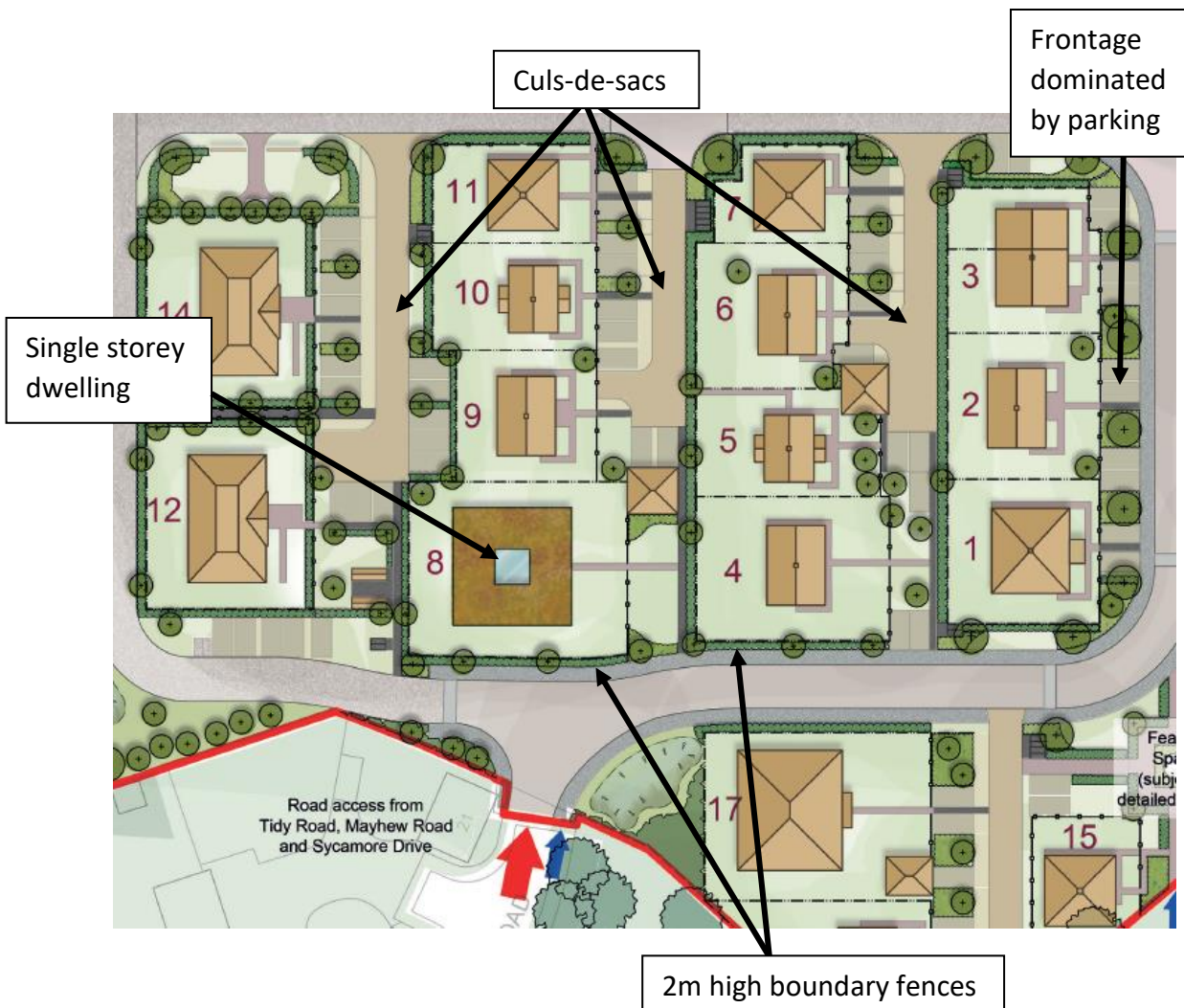


Figure 5: Extract from Site Layout Plan to show the Tidy Road entrance to the site

8.3 A further example is the principal axial route which, as the main distributor road, can be read as a very important street in the layout. This street will be enclosed by gable ends and fenced and hedged boundaries, with no primary active frontages. A substantial majority of the fencing consists of 2m high close boarded fencing. Hedging will not ameliorate this poor-quality boundary treatment. The street is also edged by spaces of indeterminate use and some parking spaces. The National Design Guide at paragraph 68 (p19) states that successful streets are characterised by *'buildings facing the street to provide interest, overlooking and active frontages at ground level'* and that *'careful planning and design create the right conditions for people to feel safe and secure ...[including] active frontages along its edges, provided by entrances onto the*

space...'. The effect of forms of enclosure that I have described above, combined with the lack of footpaths along it, will create an unsuccessful street character that will deter comfortable use by pedestrians - as if a private space only.

8.4 The layout is partly characterised by a quantity of enclosed spaces of indeterminate use that appear to be neither fully public nor fully private. These include to the immediate north of plot no. 14; to the immediate south of plot no. 21; to the immediate east of plot no. 8; opposite plot no.15; and to the immediate east of plot no. 35. Good space is useful space and where that is indeterminate, as in the appeal layout, it can add in to uncertainty about how to navigate and use the layout.

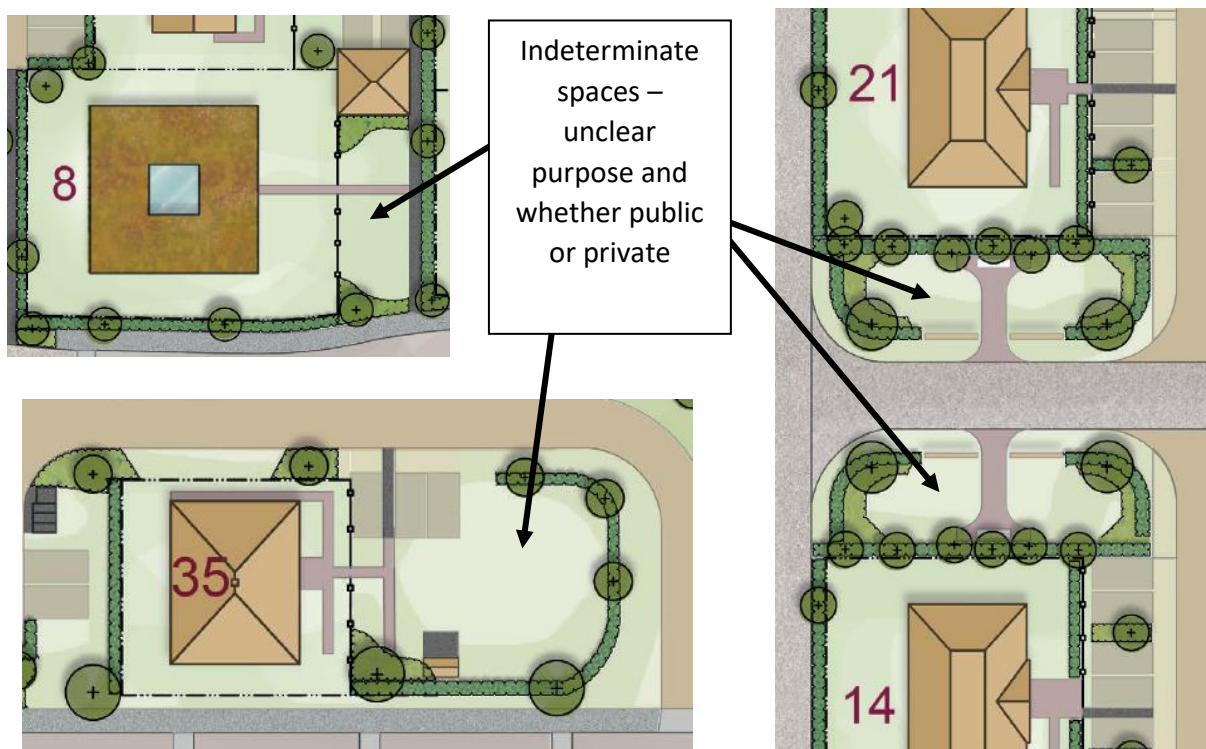


Figure 6: Extracts from the Site Layout Plan to show indeterminate spaces within the layout

8.5 Indeed, it appears as if all space on this layout must, in some way, be enclosed and separated off, whether footpaths, green open space, parking areas or spaces of indeterminate use. The effect of this design feature is almost one of privatisation, where all space must be defensible space and which limits the opportunities for social interaction between residents.

- 8.6 The result of this kind of street and spatial character is one where the layout is dominated by private enclosed spaces (the single-sided culs-de-sac, which themselves are little more than parking courts) and streets with a private character; and where the public street - the access route from Tidy Road to Garden Square with a footpath each side of the highway – is limited in extent, unattractive in character and which appears to deter use and surveillance from active frontages. I judge this to be contrary to what the National Design Guide at paragraph 102 (p31) says a well-designed place should have: *'streets (which) are public spaces that are open to all. They encourage people to walk and cycle rather than depend upon cars...'*
- 8.7 I judge that this imbalance between private and public streets and spaces and also their character, exacerbates the effect of separation in use between the layout and the surrounding area created by other aspects of the layout already identified above. I judge this effect to be undesirable.

Open spaces

- 8.8 The open space that sits at the western end of the layout appears almost incidental in terms of its position and value. Its form simply consists of the space leftover after the grid of culs-de-sac has been imposed on the site. There are no dwellings that front onto it and it is bounded by 2m high closeboarded fencing, a road and the back gardens and backs of residential properties at plot no.s 12, 14, 18, 19, 20, 21. This is quite clearly contrary to the National Design Guide at paragraph 131 (p40) which states that *'well-designed shared amenity spaces feel safe and secure for their users ... They are well overlooked...'*. This point is also made by the Designing Out Crime Officer in his comments at paragraph 2.0 (f) (p3). The open space's purpose is unclear other than that it would host a feature space (shown as a future education building in a previous layout) designed to terminate the main axial route. The open space lacks integration into the overall layout with the result that its safe use would be discouraged.



Figure 7: Extract from Site Layout Plan showing the open space on the western end of the site

- 8.9 The position of open spaces within the layout is partly dictated by the desire to create a green buffer to the sewage treatment works to the north-east of the site which is understandable. This open space (that includes a play area), however, is largely edged by the main route along its southern boundary where it connects with the residential layout. The effect of this is to semi-detach it from surrounding properties and create barriers to its use, an effect exacerbated by the lack of active frontages that face onto this space that would provide passive supervision of it (excepting for plot no.35) and its enclosure by hedging. The opportunity to use this space for fronting dwellings onto it and thereby creating an attractive outlook has been ignored.
- 8.10 Both the north-eastern and western areas of public open space are not fully integrated into the layout due to barriers and a lack of overlooking. This is because the housing

and open spaces have not been designed together. The effect of this will be to discourage the safe use of the open spaces.

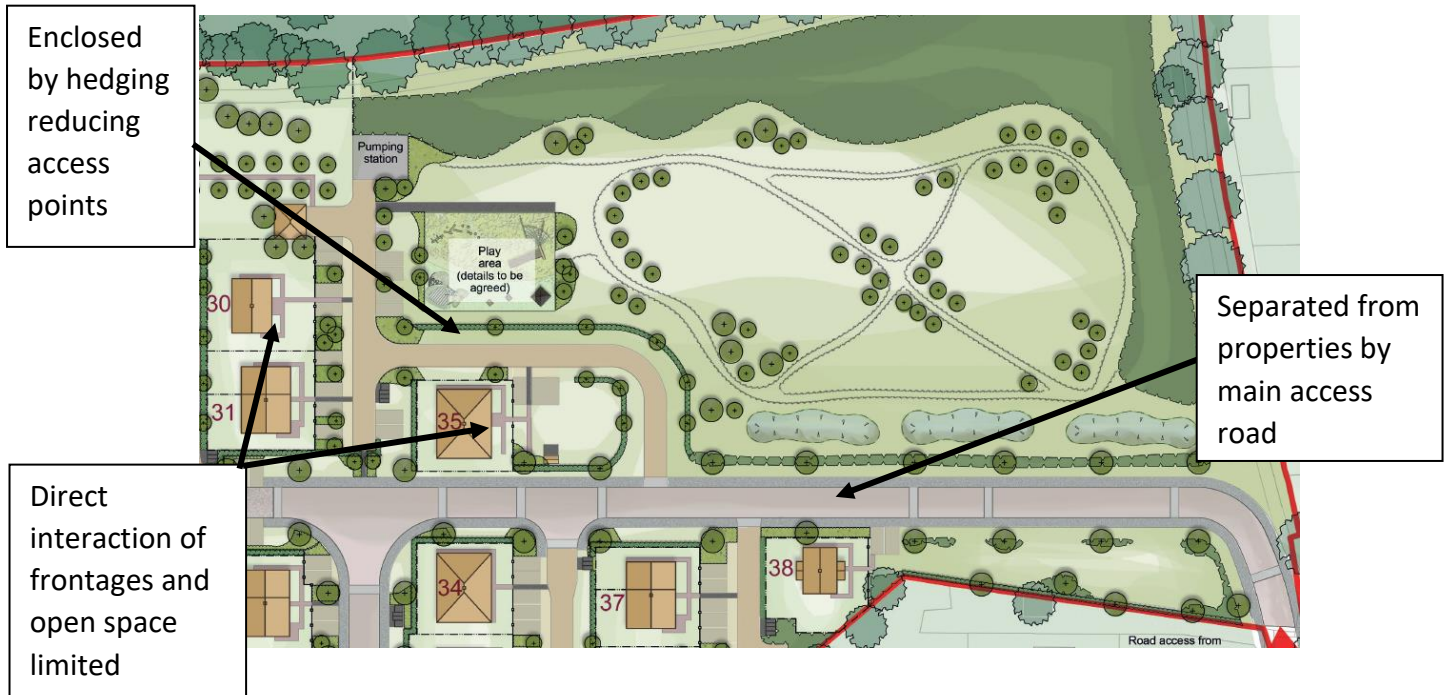


Figure 8: Extract from the Site Layout Plan showing the open space on the north-eastern side of the site

9.0 Comments on Building for Life 12 Assessment at Appendix X of Appellant's Statement of Case

- 9.1 As part of the appellant's Statement of Case a Building for Life 12 Assessment has been included upon which I comment below. The concluding scoring results (p34ff) do not form part of my commentary or my evidence in general which relies on my own objective critique of the appeal layout.
- 9.2 I note that on p7 of the Assessment in the first paragraph, the authors state that the vehicle connections (at Tidy Road and Garden Square) link up through the site to create a 'minor through-route'. Yet, the diagram on p24 of the same document illustrates this route as a 'main route'. It cannot be both a minor route and a main route. This confusion illustrates my point, above at paragraph 4.6, about the lack of clarity in respect of the hierarchy of use of the road layout.
- 9.3 In the same paragraph, the authors state that pedestrians can access the site via the proposed street entrances (at Tidy Road and Garden Square). However, as I have already noted above at paragraph 7.4, the appeal layout does not provide for a pedestrian access off Garden Square, at least as far as the designer's drawing shows it (op.cit.).
- 9.4 I note that on p13 of the Assessment in the first paragraph, the authors acknowledge that the 'design uses buildings that are similar in form even if they have very different internal configurations'. I judge that this partly supports my point above at paragraph 3.1 about the uniformity of building typology including the form of buildings.
- 9.5 The Assessment states at the first paragraph of p17 that there are several ways in which the proposal generates a distinctive character, some of which are 'at odds with usual urban design best practice', with which I agree. The same paragraph acknowledges that the standard (or typical) relationships between buildings and public space are not possible, in many instances, as a result of what the Assessment on p31, paragraph 2, calls the 'regimented orientation' of the buildings, with which I agree.

- 9.6 I agree with the statement in the Assessment at p21, first paragraph, that the principles that underpin the (appeal) layout make the requirements of creating well defined streets and spaces difficult. Problems with the layout identified by the Assessment here include that 'backs of plots are addressed by the fronts of adjacent properties and so on'. I would have thought an expert assessment would have gone into greater exploration of this critical point beyond saying '...and so on'. What is the 'so on'? This is most unhelpful. It is clear to me that the principles referred to have resulted in a designed layout that cannot successfully meet this test and that an impartial assessment would say so. No reference here is made to culs-de-sac at all, as if this ubiquitous street character does not form part of the appeal layout. It is why there are one-sided streets with limited surveillance, as identified here in the Assessment.
- 9.7 The second paragraph on p21 confirms that the appeal layout is not as secure or 'enlivened' as would be the case if perimeter blocks had been used (for example). I believe that this is an important acknowledgment of a design failure and I agree with it.
- 9.8 The third paragraph on p21 acknowledges that the central street which is an important space does not enjoy active frontages along it. I support the assessment of this street as an important space and agree with the point about frontages.
- 9.9 The Assessment at p23 states that the layout is simple and 'should be easy to navigate' (first paragraph). Perhaps this statement should have been qualified as it goes on to confirm that, actually, it will be less easy to navigate in terms of finding specific properties. This is due, according to the Assessment, to the culs-de-sac being 'relatively uniform, so one looks much like another'. I believe that the author is making my argument for me, here, and I agree with it. An entirely residential layout where it will be difficult to find specific properties – as acknowledged in the Assessment - is surely fundamentally flawed and my view is reinforced by the National Design Guide which states at paragraph 81 (p23) that a '*clear layout and hierarchy of streets and other routes helps people to find their way around so that journeys are easy to make. Safe and direct routes with visible destinations ... encourage people to walk and cycle.*'

- 9.10 Also at p23 in the second paragraph, the Assessment refers to the drives that allow access to the properties as shared surfaces which will make them feel like 'intimate, private spaces ... for local access only'. In fact, all routes across the appeal layout, excepting that which connects Tidy Road to Garden Square, are shared surfaces and will, therefore, share the same qualities of being intimate, private and certainly for local access only.
- 9.11 Again at p27 in the third paragraph, it is acknowledged that application of the design principles that appear to underly the appeal layout result in 'restrictions on how the streets could be treated ...' in terms of their function as social spaces, for example. This does suggest to me that there is some fundamental aspect of the layout that means that it repeatedly fails to meet relevant tests within the Assessment.
- 9.12 I note that the Assessment at p29 in its third paragraph acknowledges that the appeal layout relies 'heavily' on one type of parking solution and this is a point that I made at paragraph 5.1, above. Indeed, the Assessment, overall, appears to support my contention about the uniformity of design approach applied to the appeal layout e.g. in respect of parking, street type, street character, orientation of buildings and the form of buildings, and this is helpful.
- 9.13 I do broadly agree with the main issues set out in the commentary on p37 that form the Conclusions to the Assessment and judge them to be fair, although the Council has no concerns regarding the architecture of buildings or specific house types.

10.0 Conclusion

- 10.1 It is my judgment, in conclusion, that the appeal layout is a highly private layout that fails to create well laid-out connected streets for pedestrians and vehicles and appears designed to discourage integration with surrounding development, social interaction, easy navigation and public access. This is illustrated by the fact that the layout is designed wholly around the uniform application of a grid pattern of single-sided culs-de-sac which are private dead-end spaces with one looking much like another. As a result of the regimented orientation of dwellings, nearly all accesses into dwellings are off these private spaces and very few are accessed off the more public streets. The public streets are, consequently, downgraded to distributor roads, only, and do not invite enjoyment or use as public streets, as they have no street character. The houses, intentionally, relate positively only to the private culs-de-sac but not to the shared spaces and public spaces (streets and green open space) around them. This private layout and regimented orientation are not an accidental outcome of the design but *the* design drivers.
- 10.2 In this way, the rigid and uniform approach to design illustrated in the appeal layout, overall, provides for a scheme that is detached, inwards-looking, difficult to navigate, unintegrated and essentially private in character, resulting in a number of elements of poor design which are unacceptable. This will be contrary to the development plan (Policies DM21 and DM22), national design guidance (cited above) and also national design policy which requires that developments should *'function well and add to the overall quality of the area...; [be] visually attractive as a result of good ...layout...; establish ... a strong sense of place, using the arrangement of street [and] spaces ... to create attractive, welcoming and distinctive places to live, work and visit; [and] create places that are safe, inclusive and accessible...'* (paragraph 129(a)(b)(d)(f) of the NPPF); and which should *'promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example ...street layouts that allow for pedestrian and cycle connections within and between neighbourhoods and active street frontages'* (paragraph 91(a) of the NPPF).

10.3 On these bases, therefore, the Council was justified in refusing the original application partly on the basis of the design of its layout, in my professional opinion as the Council's principal design advisor.