

23/0571/MFUL development of former EDDC offices at Knowle, Station Rd, Sidmouth, EX10 8HL

Introduction

I object to this application on a number of points, the case for the nature of the development has been shown as non-viable, it will have a negative impact on local health and care services, the scale and mass of the new design will have a significant negative impact on the locality including the adjacent listed building, the actual design of the two large blocks is poor and has no place in the local townscape, there are doubts about the impact on the local sewers, and the development will impact on the local treescape.

The original application from 2016 was refused by EDDC but the decision was overturned on appeal. This established the principle of a development of 113 age restricted apartments and ancillary facilities and the current applicant cites this as a 'fallback' should this modified application be refused. Events subsequent to the appeal have shown that local objections were valid and the original developer has abandoned the project and sold the site on while, according to Land Registry records, sustaining a loss of several millions of pounds.

Housing Need

We were told by the original applicants that there was a need for this scale of age restricted housing in Sidmouth and that it would make a positive contribution to the local housing stock, including the freeing up of under occupied properties which would then have a positive impact on the housing market down the chain.

Detailed arguments were put forward by objectors that this was not the case for Sidmouth. There is a national shortfall of suitable accommodation for people needing some level of care, but much of this is based on data from large urban areas not a small, isolated town in a Devon valley. The objectors did not win the argument and the development was approved. The abandonment of the original scheme has shown the objections were valid.

The Churchill development just across town still has 9 apartments unsold and they are resorting to inducements such as offering £15,000 cash back to tempt buyers. Powys has 8 apartments for sale three of which have been for sale for more than 12 months. There cannot be sufficient demand for another 86 age restricted apartments in Sidmouth. Pegasus Lifestyle decided that Knowle was not a viable business venture for an age restricted extra care development and, despite having invested large sums in the application and appeal process, they sold the site to McCarthy Stone for two thirds of their original purchase price.

Impact on local services

There is not sufficient local demand for the current provision of age restricted housing. This development can only succeed if it attracts most of its customers from outside the immediate area. There are strong local demands, there is a strong local demand for care workers of all types for the existing population, there is a strong local demand for housing affordable to those care workers, there is a strong local demand for appointments with doctors and dentists. Local care and health services are struggling to cope with the demand of the existing population.

The applicant's own Social Needs Report identifies the issue of elderly people moving into the district and accentuating the skewed age demographic as a problem. Importing large numbers of people with a range of extra care needs will place an intolerable burden on the local care and health services.

The original scheme would have been a burden, the proposed development is worse. Using the McCarthy estimate of 1.2 to 1.3 residents per apartment, the previously approved development of 113 apartments would have seen up to 140 residents. The proposed 86 apartments plus the 70 bed care home, will see 180 elderly residents on the site. Most of these will be new to Sidmouth and will need to be registered with local GPs and dentists. Sidmouth is already a magnet for retirees, we do not need a national company marketing the town and this site as somewhere for people to enjoy their later years.

Mass and Scale

The McCarthy plan has some positive changes from the previous plan, notably the replacement of the overbearing Block A with less massive houses and this should be a relief to some neighbours. The reduction in height of the corner tower in the Dell is also welcome.

Unfortunately these reductions have been achieved by increasing the mass of the blocks facing onto the immediate neighbours lower down Knowle Drive and the public garden, and an increase in the proposed number of dwellings on the Plateau area with the 86 apartments formerly in 4 blocks being squeezed into two blocks and the addition of 9 houses. The net effect is that this application is a retrograde step from the previously approved scheme. It should be rejected and the developers should be as good as their word in the Planning Statement and 'fallback' to completing the existing design.

Impact on a listed building

It is hoped that the garden area of Knowle will be a significant asset to local people and visitors when the Town Council takes ownership. In particular, I look forward to the listed summer house being rescued from the neglect it has suffered in recent decades and for it to become a star feature of the garden.

Following public consultation by Pegasus Life as they were then, the previously approved plans for the Plateau were an amended layout with Block E being moved back from its original location and rotated to reduce the visual impact on the summer house (Fig. 1).

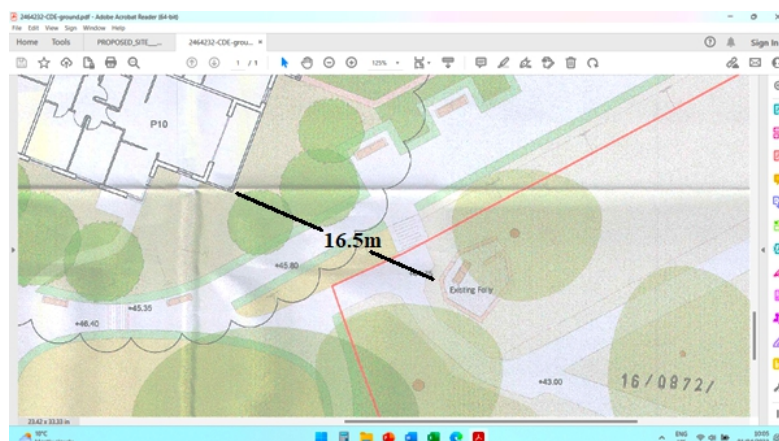


Fig. 1 Relationship to the listed Summer House 2018

In accompanying documents, the current applicant makes much of their pre-application public consultation, but they gloss over the unfortunate fact that the majority of comments were negative and there is little evidence that they have taken anything on board. As with the application approved finally in 2018, the concerns of local people about visual domination of the garden in general and the summer house in particular were made clear by several people during McCarthy's public consultations. Yet the current plan has sited the new Block RL 10m closer to the summer house compared with the approved plan for Block E (Figs. 2, 3 & 4), and it has been turned through 45° to present a full monolithic face as a back drop to the summer house rather than a building corner with receding faces. The block has been moved to the east and now stands almost directly behind the summer house. Presumably to give more apartments a clear sea view beyond the large pine and beech trees to the south west of the summer house. The visual impact on the diminutive summer house will be enormous.

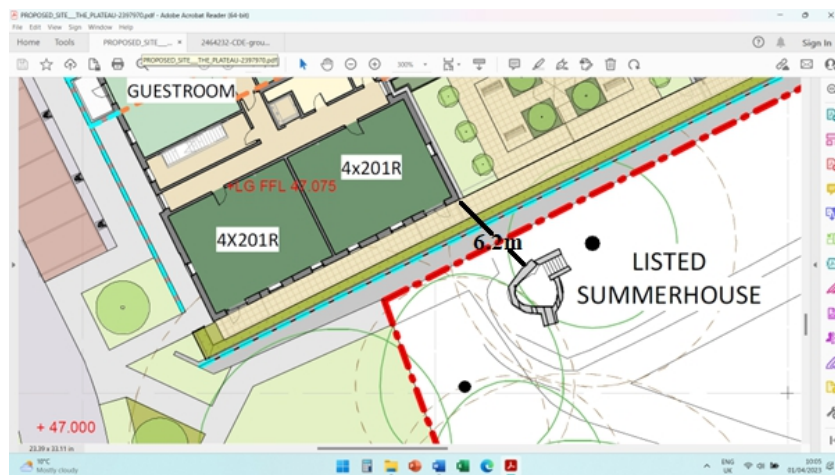


Fig. 2 Relationship to the listed Summer House 2022

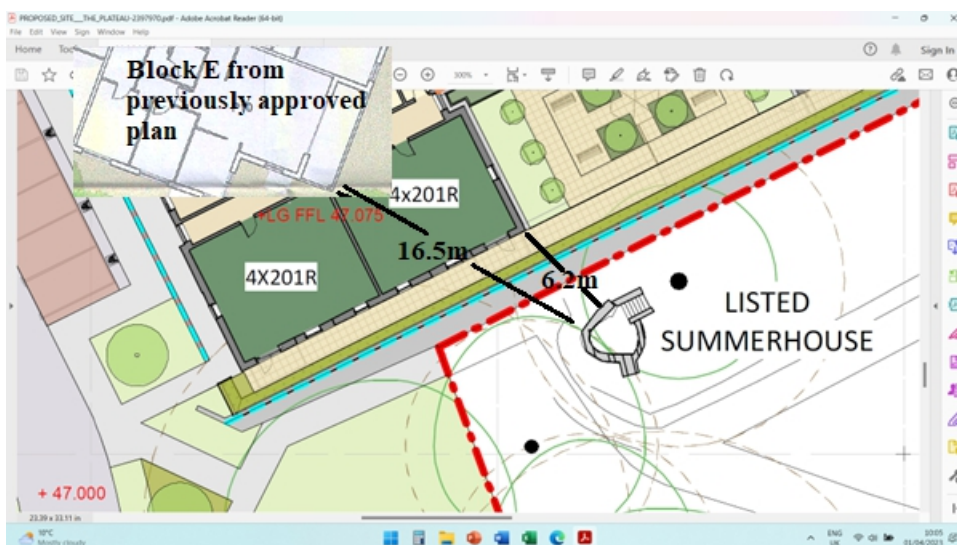


Fig. 3 Overlay of 2018 onto 2022

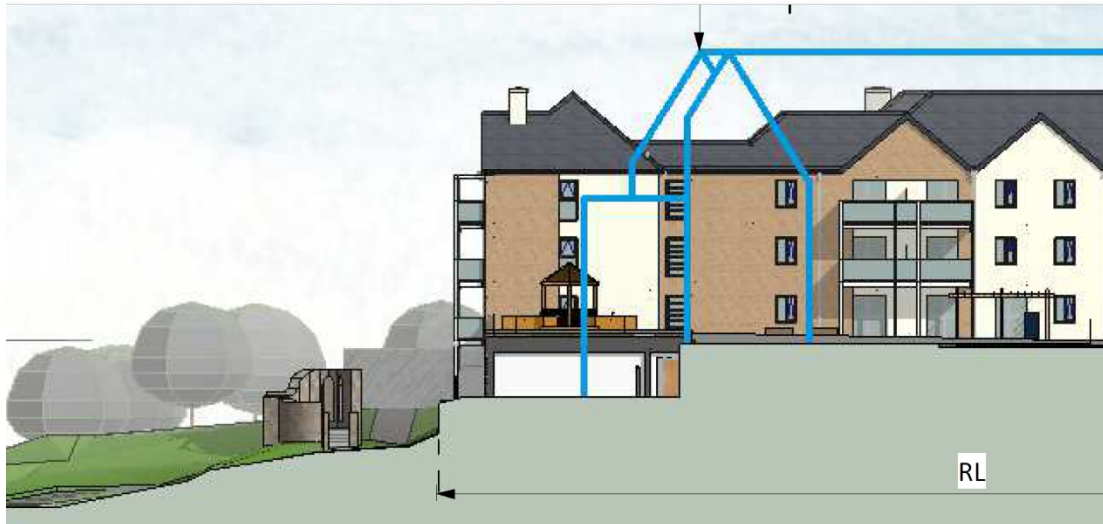


Fig. 4 The position of Block RL with the approved Block superimposed as a blue outline.

Impact on the public gardens

One of the key considerations listed in paragraph 5.1 of the Townscape and Visual Impact Statement is *The need for sensitive treatment of any additional influences of built form on the existing informal and ornamental parkland within The Knowle.*

There was a lot of public opposition to the large mass of the original Pegasus-Lifestyle Block D dominating the garden area. Again the plan was modified to gain approval with the original roof profile of the south elevation being broken up with gables and a top floor open terrace (Fig. 5). There was some concern at the time that there would be a supplementary application to include another storey of apartments in the roof, but that would not have impacted on the south elevation facing the park.

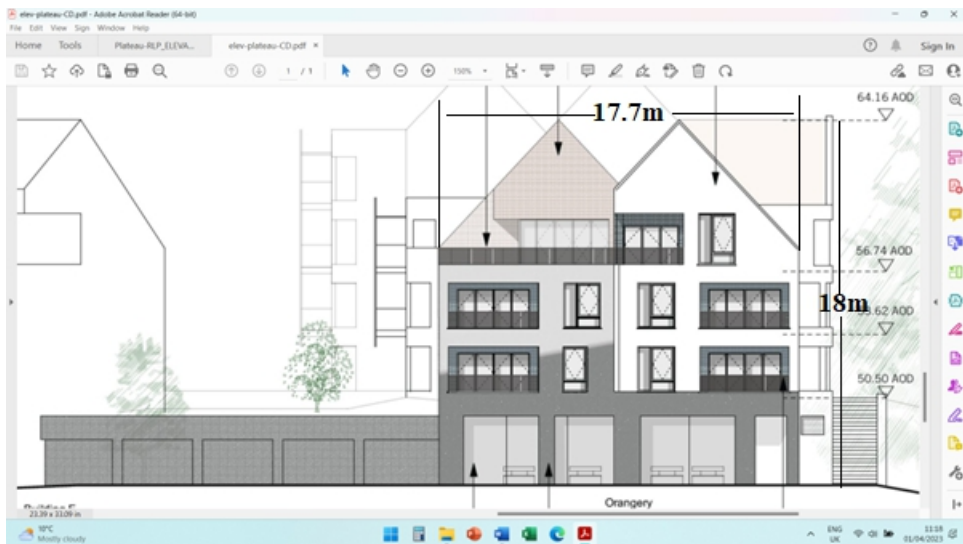


Fig. 5 South Elevation Block D 2018

This varied roof design was mentioned specifically in the appeal decision to dismiss objections of visual intrusion to long distance views from key locations such as the South West Coast Path. Paragraph 17 of the appeal decision states *"the varied roof design and height would fragment the development in such views so that it would sit comfortably within its heavily landscaped setting."*

The new application for Block RLP has restored and enlarged the rectangular mass of the elevation facing onto the garden by increasing the width and turning the gable ends to the eastern and western elevations to accommodate an extra storey of apartments (Fig. 6). This elevation is a 34% increase on the built surface directly above the boundary to the garden.

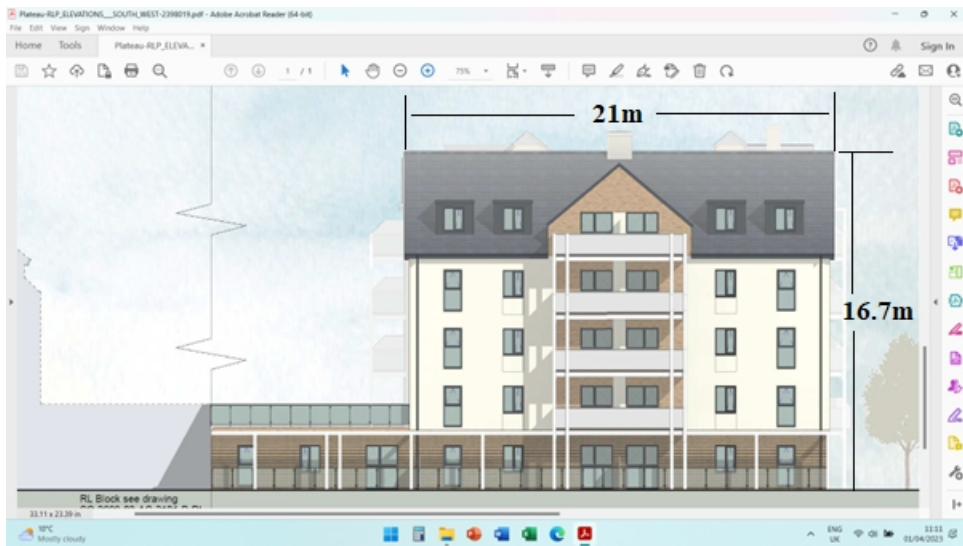


Fig. 6 South Elevation Block RLP 2023

Also, the southern boundary of the block has moved even closer to the site boundary which makes the elevation even more imposing on the public park (Fig. 7). The view used in the local publicity is taken from an impossible position. It is generated very carefully to minimise the impact by being not at ground level in the garden but from a point that appears to be about 10m high up in the large Monterey Pine halfway down the garden.

Often publicity material is populated with CGI humans to give a sense of scale and make it more appealing but not in this case. I have added one of the two benches that stands on the path in front of the site boundary to the picture and a human approximately 2m tall to the same scale (Fig. 8). Perhaps McCarthy Stone could provide a CGI from that viewpoint.

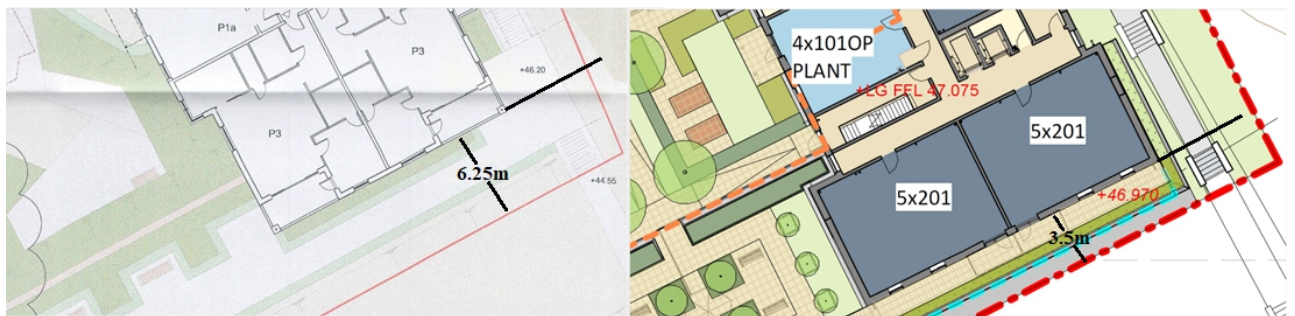


Fig. 7 Relation of Blocks D 2018 & RLP 2023 to the site boundary



Fig. 8 CGI view used in publicity materials, bench and 2m tall human added

Design

As well as being over massive, the design of Blocks RL and RLP is poor and has a negative visual impact on the local townscape.

Section 3.6 of the applicant's Design and Access Statement says the site presents many opportunities which is true, it is a prime site in a prime location and deserves better than two large blocks reminiscent of a budget hotel on an out of town trading estate.

The section features modern architectural claptrap, e.g. *'the public byway currently lacks legibility in the context of the existing structures.'* It continues, *'There is opportunity to create a clearer, more enjoyable route through the site with the use of surface treatments, landscaping and visual engagement between residential communal spaces and the public byway.'* The 'more enjoyable' route will now take you very close under the towering eastern elevation of Block RPL extending well beyond the existing build line (Fig. 9).



Fig. 9 People enjoying a walk alongside Block RLP

Section 2.20 of the Townscape and Visual Impact Statement tries to tell us that the blocks relate to large and often unloved buildings around the town, see below. Yet paragraph 3.6.3 of the Design and Access Statement links to the same theme that was derided with the previously approved plans, that they are *'in keeping with the Sidmouth vernacular.'* There are 20 references to local and coastal vernacular in the

Design and Access Statement. Of language, vernacular refers to that spoken by the 'ordinary' people and in architecture it refers to 'the domestic, the everyday'. This ordinary person of Sidmouth does not see the relationship between Blocks RL and RLP to local domestic architecture.

When the old hotel was selling off building plots in the 1960s, a design brief was included as a covenant in the deeds that stipulated the hotel had to approve the plans to ensure the new homes would not spoil the look of the surrounding area. It would be nice to see that reversed and the residents that surround the site have a say so that the new building does not spoil their neighbourhood. Fig. 10 shows the houses that adjoin the site, this represents the vernacular architecture of the surrounding area, not the collection of large blocks shown in the Townscape and Visual Impact Statement. The TVIS features the nearby Knowle Grange but this is an anomaly in the area and considered a blot on the landscape,



Fig. 10 Properties that adjoin the development site.

Paragraph 3.6.4 covers the home of the bats in Block B. *'In addition to its ecological importance to the site, its heritage value makes it a good touchstone for the architectural language of any future development.'* Block B is a flint rubble Victorian Cottage Orn  (Fig. 11), the only link between it and the development is they both have a pitched roof, and even then the pitch is different. Standing just 7m away from the left hand end of its east elevation, Block RLP will completely dominate Block B.



Fig. 11 Block B

Paragraph 3.6.5 of the Design and Access Statement says *'The formal terraced landscape can be maintained and used to reduce visual height of any future development'* which adds insult to injury because the incursion onto most of the formal terraces was one of the major objections to the approved plans.

The applicant's Townscape and Visual Impact Statement sets out important considerations for the site's context:

2.12 *maintaining a sense of enclosure in the landscape; reflecting the local vernacular and geodiversity in new developments*

The siting of two very large blocks of generic architecture on the Knowle does neither.

2.14 *avoiding the location of new development on prominent skylines*

2.17 *Consideration of the impacts of proposed development on upper slopes, as these sites are often particularly visible in wider views.*

2.18 *Key Strategic Views... the view from 'Salcombe Hill to the West'*

The Visual Impact Statement makes much of the invisibility of the development from the town because of the tree canopy, but this is true for the existing building so the development does not represent any gain.

The existing building is partially visible from the key strategic viewpoint on Salcombe Hill but most of the building is masked by the tree canopy. Even if the proposed development was within the footprint of the large Victorian hotel building the replacement would still be a negative step visually. But, much of the development is taking over the former lawn terraces and approximately 21m forward of the existing hotel building with no loss of height to the roof line and a corresponding extension of the eastern elevation will emerge from the tree cover. Bringing the build line forward will be a significant increase in the visual intrusion from the strategic viewpoint. It will also be a significant intrusion seen from viewpoints on Peak Hill because of the removal of the tree cover on the western side of the site.

2.19 *key defining landscape elements of the Sidmouth area... Historic landscapes... are integral to the setting of listed buildings... low density early and mid 20th Century suburbs with large gardens and mature trees.*

2.20 *the site and its immediate context lie within the Bickwell Valley Character Area.*

The proposed design of Blocks RL and RLP bears no positive relation to any of these characteristics.

The Townscape document attempts to mitigate the impact of the development by providing pictures of other large buildings which it says characterise the area even though most are not related to the development area. They even resort to taking pictures of the backs of buildings such as Abbeyfield Court which has an elegant late Victorian façade to the street which bears no relation to the facades of Blocks RL and RLP. The attempt to equate the development to Balfour Manor by saying the Manor is a large building including linear blocks hardly gives a true picture.

Equating the development to Knowle Grange and Cottington Court is much more relevant. They are comparable developments, but I doubt if anyone thinks they make a positive contribution to the look of the local area. Saying your poorly designed development should be allowed to go ahead because there are other blots on the landscape nearby is hardly a positive case.

The Townscape and Visual Impact Statement makes much of the poor state of the existing site including the boarded up car park area. Since the developers think this area is relevant to their application it is fair to make a brief comment on the care home design which has been likened to a utilitarian prison block.

Drainage Strategy

Paragraph 6.2.5 of the Drainage Strategy says, *'The foul discharge from site has already been approved under a previous application. The strategy followed within this submission has not been altered from this approved strategy.'* **This is not true in some important respects.**

Surface Water

There was some concern about the drainage plans for the original application, particularly the size of the attenuation tanks to reduce the risk of flooding to properties downhill from the site during heavy rain. We have to rely on expert opinion to judge if the system capacity is sufficient and the previous scheme was passed and is being taken over by the current applicant according to the Flood Risk Assessment & Drainage Strategy submitted from Jubb Consulting Engineers (Paragraph 6.1.1, Document 2401334).

However, South West Water appears to be operating under a misconception. SWW was among the first of the official consultees to respond to the planning application. Did they accept the drainage plan because it was said to be the same as previously approved plan? The SWW response concludes

"Having reviewed the applicant's current information as to proposed surface water disposal for its development, please note that method proposed to discharge into the ground (infiltration) is acceptable and meets with the Run-off Destination Hierarchy.

Having reviewed the applicant's current information as to proposed surface water disposal for its development, please note that method proposed to discharge into the ground (infiltration) and into a surface water sewerage network system is acceptable and meets with the Run-off Destination Hierarchy."

The duplication itself suggests a hurried response, but the real issue is that the original and the current application recognise that the site is not suitable for infiltration and this method of disposal is not being deployed.

Also, the plan passed in 2018 had the surface water from the Plateau split, some went to the southern exit but some was discharged down into the Dell and piped along the driveway into the drain in Station Road. All the surface water from the McCarthy Stone site is being discharged to the surface water drain in Knowle Drive.

Paragraph 6.3.14 *During an exceedance flow event, exceedance flows will be discharged from the site to South and East with flows making their way safely away from the buildings.* This may protect the development site, but it does not protect the residential properties in Knowle Drive to the south of the site.

Foul Water Drainage

The new plans show all of the foul water from the Plateau going to a single pipe that joins the existing sewer in Knowle Drive. Once more SWW's approval of the scheme deserves more attention. The plan approved in 2018 divided the foul water disposal from the Plateau. Foul water from the eastern half of the development, Blocks B, C & D, went to the eastern outlet running down through the parkland to discharge into the sewer in Station Road. The western building, Blocks A & E, discharged to the southern exit and the sewer in Knowle Drive. I have significant concern that this system will not cope with the peak flow generated by residents of 88 age restricted apartments and the nine houses as they get up in the morning and start their day.

Impact on the trees

The whole of the Sid Valley was declared a Civic Arboretum in 2012 in recognition of the importance of the town's treescape to its character and identity, and a community group was formed to oversee the project, now Sidmouth Arboretum Trust. The tree collection in Knowle, with more than 70 species collected from around the world, is a major element in that treescape.

The Knowle's tree collection also has significance as a marker of the site's history. Every time the estate changed hands, the new owners planted trees. There are only three still standing that were probably planted by Thomas Fish and 4 or 5 from Richard Thornton. But there are several trees that mark the conversion of the hotel at the end of the 19th century and the conversion to council offices in the early 1970s. The landscaping plans suggest a tree planting scheme but fail to say which species will be planted. The previously approved application including details of species and was supported by members of Sidmouth Arboretum Trust.

I have limited confidence in the Tree Constraints document which contains a number of mistakes in identification. I am disappointed that the compiler cannot tell the difference between *Pinus strobus* and *Pinus radiata*, *Quercus cerris* and *Quercus rubra*, nor *Aesculus x carnea* and *Aesculus indica* among others. It seems that it was compiled by someone with limited knowledge of an international arboretum collection. Pages 115 and 116 of the Design and Access Statement adds to my concern that consideration of the trees has not been given expert attention, it reads as an off the peg plan from McCarthy Stone's back catalogue. The absence of a detailed planting plan as submitted with the previously approved application compounds that view.

While the applicant is scattering a few young trees around the development, these will not be an adequate replacement for some of the trees that are to be removed.

The group of trees along the western boundary of the site including numbers 70 & 71 on the plan at the south west corner of the existing building are the main screen between the Victorian building and properties to the west, not just the immediate neighbours but properties right across the western valley and the strategic viewpoints on the coast path on Peak Hill.

The tall part of the existing building would only have a limited visual impact on Cotswold and Knowle House in Knowle Drive if the trees were removed. There would be no issues of overlooking because there are no windows on the western elevation. Block RL will extend considerably the face presented to Cotswold and Knowle House with the magnifying effect of being uphill from both domestic properties. The absence of the dense tree screen will expose them to severe overlooking with consequent loss of privacy from the 10 balconies and 24 windows above the ground floor on the western elevation of Block RL.

The line of *Pinus radiata* (not *P. strobus*) marked as 41 on the plan is recorded as a "*visually significant row of trees along edge (sic) of site*" and the only recommendation is the removal of some dead branches. These trees are a prominent element in the treescape visible from the adjacent parkland, Station Road itself and properties on the raised ground on the eastern side of Station Road. They are approximately 50 years old and are some of the trees that mark the takeover by the council. Their loss will be particularly poignant because Sidmouth's skyline is punctuated by a number of larger specimens planted just over a hundred years ago. Three of them stand in the garden of Knowle, one inside the development site. These are coming to the end of their safe lives, we have lost six of the giants in the last three years. The trees in G41 would be the next stage in the succession that keeps this species, introduced commercially by one of the Lobb brother plant hunters working for the nearby Veitch nursery in 1843, on the skyline.

One loss that I think is particularly significant is the very large *Magnolia grandiflora* that has been growing against the south face of the old hotel for over 100 years. Considerable efforts have been made to move the nearby Ginkgo because it has significance as one of the trees planted when the hotel was sold to the council. The effort would have been better deployed if the design had accommodated and save the *Magnolia* which is one of the finest examples of the locally significant Exmouth cultivar and is one of the markers for the redevelopment of the hotel.

The arboriculturalist seems to be particularly harsh when dealing with Birch trees. The two in the middle of the Dell, number 46 on the plan, are graded as C2 but they are both healthy and of good form and in any other planting scheme would be B1, worthy of retention. The multi-stemmed Paper Bark Birch 83 is a fine example of the species that is much better than C1 classification and would be seen as a significant asset in any large garden or park.

Conclusion

I had multiple objections to the previously approved plans for the Knowle but would have to accept that permission had been granted should McCarthy Stone choose to build it as the 'fallback' option. While the new application has some minor improvements to the previous scheme, overall it is a retrograde move too big and too poorly designed for such an important site.

Ed Dolphin