

Planning Reference 23/0571/MFUL

I wish to comment on the Planning Application Reference 23/0571/MFUL, Former Council Offices Knowle Sidmouth EX10 8HL.

I wish to object to this planning application on the following grounds: -

1. The Proposed Plan for Surface Water Drainage Presents a Significant Risk of Flooding

Developers are responsible for the management of surface water run-off from new developments to mitigate flood risk to the site and surrounding area. The Drainage Strategy 2398089 and Flood Risk Assessment and Drainage Strategy documents forming part of this application state that the surface water for the development being built by McCarthy Stone (the buildings detailed in b), c) and d) of the proposal) will be discharged through a new drainage pipe exiting the site onto Knowle Drive between the properties of Indemnity House and Heathers. It is then shown to connect to an existing SWW public pipe which is shown to run to the boundary of Harwood Dale on Knowle Drive and then turn south through their garden where it discharges into a small stream. It should be noted that this SWW public pipe already struggles to cope with heavy rain as it takes a large part of the surface water for Knowle Drive and the pipe taking the water through the garden of Harwood Dale is only 15cm in diameter. Owners of properties in Knowle Drive have been advised that the public surface water drain is already at full capacity and all new development has had to make alternative arrangements such as soak-aways. Indeed, when Westgate, Knowle Drive was built in 1996 this was the case and as far as I am aware all subsequent building and extensions in Knowle Drive have been subject to the same restrictions. The SWW pipe in Knowle Drive is clearly unable to accommodate the surface water from this substantial development. This proposal not only presents a significant risk of flooding to properties in Knowle Drive but it will also impact on properties downstream of where the pipe discharges in the garden of Harwood Dale. The stream exits a garden of a property on Cotmaton Road (near the junction with Cheese Lane) where it runs along the side of the road until entering a drain. This drain heads towards Station Road and I understand in periods of heavy rain is already unable to cope with the volume of water, therefore this proposal also presents a flood risk to properties in that area.

2. Gross Overdevelopment of the Site

Planning consent for this site was secured for 113 housing units (Appeal Decision 16/0872/MFUL), this application seeks to provide a 70-bed care home and a further 95 housing units with associated buildings/services. This is a considerable increase and should be refused as a development of this density is not suitable for this site.

3. Inappropriate Design and Massing

The design of the two large apartment buildings detailed as items b) and c) in the proposal are of a height and mass that are totally unsympathetic to the surrounding residential area and parkland. The design statement makes mention that inspiration was taken from seafront buildings and whilst a large dominant block with prominent balconies

might be acceptable on the seafront, buildings of this nature are not suitable or in keeping with the surrounding low density private dwellings. The Neighbourhood Plan for Sid Valley 2018 – 2032 (adopted 2019) states (policy7) Building heights should be in keeping with the context of neighbouring properties.

4. The Effect on Neighbouring Properties

The proposed development will have a profoundly negative impact on neighbouring properties. As my property is in the part of Knowle Drive that will mainly be impacted by the apartment building detailed as item c) in the proposal I shall restrict my comments to this building, however, the proposal will impact negatively on many other residents. Since the last public consultation this building has been significantly increased and the position within the site altered. It will now represent a dominant overbearing block development behind the properties to the west on Knowle Drive. The most immediate properties being Chestnuts, Cotswolds, Knowle House and Westgate, but because of the excessive height it will also impact on properties on the other side of Knowle Drive including mine. The main impacts will be intruding on privacy and light pollution and the inclusion of balconies in the design exacerbates this problem. At present the skyline behind these properties is dominated by mature attractive trees and a small glimpse of the roof of the old council building (before the fire) but the proposed apartment building will change the whole character of this neighbourhood. The Townscape and Visual Impact Statement document submitted as part of this application is misleading and inaccurate. Section 6.10 states “Photomontage P1 Demonstrates that there would be very limited change in view in typical glimpsed view from Knowle Drive to the west of the site, owing to being screened by existing vegetation and built form and where visible in winter conditions filtered by canopy vegetation. Section 6.28 states “Whilst there would be some increase in the perception of height and mass on site, this would be within the setting of mature canopy vegetation” The reality is that most of the proposed retirement living apartment block will be clearly visible from Knowle Drive as the majority of mature trees referred to in the statements above will be removed as detailed in the Tree Impact Survey 2397939 and Tree Retention and Removal Plan 2398108 documents.

5. The Effect on the Appearance of the Area

The proposed development is largely on a prominent plateau which dominates the central view of Sidmouth from most directions. At present the aspect is dominated by mature trees and parkland and provides a pleasing balance with the surrounding hills. The scale and massing of the proposed development would totally transform the aspect from being natural to high rise urban. The Neighbourhood Plan for Sid Valley 2018 – 2032 states (policy 2) Any development must not cause a significant adverse impact on the current valued views (this is a listed view site VP9).

6. Insufficient Parking

The proposal looks to provide 28 car spaces for the 70-bed care home and 68 car spaces for the 95 housing units which would also have to accommodate staff car parking within these allocations. The developer states the calculations for parking allocation is based on their

experience of car use in existing developments of this nature. During the consultation representatives of the developer McCarthy Stone did concede that this was not a typical or ideal site in view of the elevated nature of the site from the Town centre and seafront and the relatively difficult pedestrian access to both. As a result, I believe they have underestimated the need for car parking, and if there is insufficient allocation of car spaces it is likely that the surrounding roads will be used for the overflow. With the proposed pedestrian access points from the development, Knowle Drive will be the obvious option. Knowle Drive is narrow and parking on the road (and often pavements) is dangerous and causes obstruction. This is not a hypothetical risk, when the site was previously occupied by East Devon Council, employees and visitors regularly parked in Knowle Drive and the obstructions resulted in access problems for residents, deliveries and emergency vehicles.

7. Effect on the Public Park and the Grade II listed Summerhouse

In the Appeal Decision 16/0872/MFUL it was noted by the Inspector that a separation distance of 16m would remain from the previous proposed development and therefore would continue to be seen in its landscaped context, albeit with a much-altered backdrop. This new proposal looks to reduce this separation considerably and is therefore likely to cause significant harm to this heritage asset. The addition of the 2 chalet bungalows as detailed in item d) of the proposal will also have a detrimental impact as they will be located within the original landscaped garden. The public park at The Knowle is of special importance to Sidmouth for residents and visitors and provides many of the specimen trees listed as part of the Town Arboretum. This development seeks to build the main apartment buildings further southwards than the previous approved scheme and with the design being effectively 5 stories high will have a greater detrimental impact on the park and will be the dominant feature.

8. Loss of Mature Trees

The excessive scale of this development will result in the loss of many mature trees. Again, I will restrict my comments to the area and trees that impact my property. I object to the removal of trees detailed in the Tree Impact Survey 2397939 document as; number 72 Sycamore, number 73 Group of Yew, number 75 Lawson Cypress and number 76 Eucalyptus. These are all mature trees and provide an element of screening and a pleasing skyline. Their removal will result in the proposed retirement living apartment block being very visible from Knowle Drive and my property. The Neighbourhood Plan for Sid valley 2018 – 2032 states (policy 6) Development should be designed so as not to adversely impact on the amenities of its neighbours and should seek to protect any existing trees that contribute to the amenity of the area.

9. The use of Knowle Drive During the Demolition and Construction

At the consultation I was given an assurance by representatives of McCarthy Stone that there would be no use of Knowle Drive for any activities in connection with the redevelopment of this site. The Construction Management Plan under the Site Welfare heading states, "The site accommodation will be located on the site within the proposed southern overflow car park area, with access from Knowle Drive. This area may also be used

at some periods for parking vehicles of McCarthy Stone site personnel". This is clearly in contradiction with the assurances previously given by the developer and does not encourage any degree of trust. Knowle Drive is only suitable for use by residents and public amenity services and any increase in vehicle use by the developers is unacceptable. Indeed, in the documents dealing with Construction Vehicle Movements and Car Parking Provision for Contractors and Site Visitors there should be an express statement that the use of Knowle Drive is prohibited.

10. Working Hours

I object to the proposed start time of 7.00am for Monday – Friday work. This should be changed to 8.00am. All reference to this start time should be altered in all documents including the Demolition, Construction and Delivery Hours and the Construction Vehicle Movements.

11. Impact and Potential Damage to Surrounding Properties During Demolition and Construction

This redevelopment gives rise to the risk of significant impacts on surrounding properties, in particular I am concerned that no provision has been made to deal with the potential impact of pile driving activity. The Further Ground Investigation Report document states, "Recommended that a piled foundation is progressed for the RLP and RL Block". There should be a commitment by the developer to meet the cost of Pre-Pile Driving Condition Surveys on surrounding properties that could potentially be damaged by this activity.

12. Proposal does not comply with the Local Plan 2013-2031

In the Local Plan 2013-2031 this site was allocated for the development of up to 50 private dwellings (C3) and I fully appreciate this has effectively been superseded by the Appeal Decision 16/0872/MFUL to permit 113 units with C2 classification. However, one of the reasons why the planning proposal was declined by East Devon District Council was not presented to the Inspector at the Appeal and therefore could not be considered. The Local Plan 2013-2031 clearly states in both its vision and strategy that "affordable homes are a top priority for this council" and that future developments should result in "more balanced communities". It was clear that the previous proposal did not meet this requirement in Sidmouth where there is already a huge in-balance in favour of elderly residents. This departure from the Local Plan 2013-2031 should feature in the consideration of this new proposal as there is clearly no attempt to comply. The Executive Summary (Planning Statement) in the proposal states "The development remains care and older persons accommodation including a small proportion that may not necessarily be aimed at the older generation". I am particularly concerned that the developers have not offered any planning obligation to contribute towards the provision of affordable housing, in fact they have taken the pre-emptive step of stating "In this particular case the application has been subject of a robust viability assessment which shows the site cannot sustain an affordable housing contribution". If the developers have overpaid to acquire this site, then it is their problem and should not be used as an excuse to avoid making adequate compensation payment for the benefits lost in not meeting the requirements of the Local Plan. Failure to hold

developers to this compliance raises the question; what is the point or worth of Local Plans? I would encourage those considering this application to re-visit the Neighbourhood Plan for The Sid Valley 2018 – 2032 (adopted by East Devon District Council) with particular attention to the section under the heading Housing, where the needs of this community are clearly and accurately stated. Sidmouth needs affordable accommodation for key healthcare workers and young families, it needs adequate local health services, this development will just increase these needs further.

Please consider these comments and objections when determining this application.

Kind regards,

Barry Curwen