

Planning Application: 16/0872/MFUL

Preliminary comment from the Futures Forum of the VGS

The Vision Group for Sidmouth objects to the planning application

<https://planning.eastdevon.gov.uk/online-applications/applicationDetails.do?activeTab=externalDocuments&keyVal=O5ICQCGH01C00>

Firstly, this planning application should be considered within the context of the earlier outline planning application which was rejected on 1st March 2013:

<https://planning.eastdevon.gov.uk/online-applications/applicationDetails.do?activeTab=neighbourComments&keyVal=M95J5FGH01C00>

The Development Management Cttee gave four reasons for rejecting the 2013 application – and these all have considerable bearing on the current application.

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### **1 - Contrary to Policy RE1 (Retention of Land for Sport and Recreation)**

This was decided when the amount of Parks and Recreation Grounds was 7.33ha above the minimum standard.

Following the Open Space Study Review of 2014, this was reduced to 1.75ha:

<http://eastdevon.gov.uk/planning-libraries/evidence-document-library/chapter8.4-environment/envo46-openspacestudyreview2014.pdf>

The Deputy CEO considers that this would allow the parkland at Knowle to be built on: “Accordingly, should the 0.354ha subject to Policy RE1 be lost there would still be an excess of 1.396ha when judged against the assessment criteria.”

<http://eastdevon.gov.uk/media/939266/110315-cabinet-combined-agenda.pdf>

The current planning application submitted by PegasusLife 'incorporates the construction of dwellings on parts of the site currently used as an area of open space'

However, at the time of the 2013 application, the National Trust objected to the 2.25ha of its Sid Meadow in the Byes being classified as a “park and recreation ground” rather than a recently sheep-grazed meadow:

<http://futuresforumvgs.blogspot.co.uk/2013/07/knowle-byes-and-when-meadow-is-park.html>

Consequently, as also pointed out at the time, “Putting these sections of The Byes into their correct designation as natural & semi-natural green space means that there is no surplus of P & R in Sidmouth – in fact there is less than even the minimum suggested standard.” <https://saveoursidmouth.com/2013/03/05/an-oversupply-of-parkland-in-sidmouth/>

Moreover, the incursion into Knowle's public open space "has never been debated by councillors" <https://saveoursidmouth.com/2015/03/13/incursion-into-knowles-public-open-space-has-never-been-debated-by-councillors/>

And the way in which the area of parkland was included in the Local Plan is very opaque indeed: <https://eastdevonwatch.org/2014/12/10/is-head-of-knowle-relocation-scheme-to-be-trusted/>

Policy RE1 (Retention of Land for Sport and Recreation) in the draft Local Plan has now been replaced by the Policy RC1 in the adopted Local Plan:

### **RC1 - Retention of Land for Sport and Recreation**

Proposals that would result in the loss of open space currently or previously used for recreation and/or sports uses, play areas or playing fields will not be permitted unless:

1. Alternative provision of equivalent community benefit is made available and will be appropriately laid out by the applicant as a replacement. Or
2. Sports and recreational facilities can best be retained and enhanced through the redevelopment of a small part of the site. Or
3. Locally there is an excess of public open space, children's play areas or sports pitch provision in the area as the case may be.

<http://eastdevon.gov.uk/planning/planning-policy/local-plan-2013-2031/>

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## **2 - Contrary to the requirements of Policy E3 (Safeguarding Employment Land and Premises)**

Following the refusal by the DMC of the March 2013 application, the District Council held a "Stakeholder Engagement Event" asking "How will the new HQ help local businesses?" It stated that "Economic vitality is a key issue for the Council and we want to have an active dialogue with local business around their needs." However, the Chamber of Commerce was never offered any such 'dialogue':

<http://futuresforumvgs.blogspot.co.uk/2014/09/knowle-relocation-project-q-pages.html>

Similarly, a Business Space Review to consider how much employment land there is should have been published – but never was:

<http://eastdevon.gov.uk/media/427365/161014-os-agenda-combined.pdf>

The Economic Impact Study had been published in January 2013, however, as part of the original application – and in the context of this study, the DMC concluded on 1st March that "The relocation of the Council's Offices would lead to a significant loss of employment in the town and would cause harm to local businesses".

The Economic Development Manager concurred, saying in the Economic Impact Study from consultants Peter Brett, "that if the changes proposed are approved and implemented this would have an immediate and lasting impact upon Sidmouth's economy."

Nevertheless, at the time, the Sid Vale Association and the Vision Group both questioned the quality of the Study:

"The adverse economic impacts are far greater than has been assessed. The critique concludes that:

- Impacts on employment in Sidmouth have been significantly underestimated. It is calculated that 69 jobs will be lost overall, rather than the 3 suggested by PBA.
- Impacts on spending in Sidmouth are similarly significantly underestimated. EDDC spending of £3.6m per annum has been discounted from the Assessment.
- Consultation of the public and stakeholders has been inadequate.
- The business questionnaire which was used to build the economic assessment is not fit for purpose.” <http://www.sidvaleassociation.org.uk/index.php?page=sva-objections-to-proposed-knowle-redevelopment> and <https://www.visionforsidmouth.org/news/2012/september/vgs-submission-to-knowle-planning-application-sept12.aspx>

Since March 2013, Policy E3 has disappeared - and has been replaced by Strategy 32, which is very clear about the need to “resist the loss of employment uses”:

**Strategy 32- Resisting Loss of Employment, Retail and Community Sites and Buildings:**

“In order to ensure that local communities remain vibrant and viable and are able to meet the needs of residents we will resist the loss of employment, retail and community uses. This will include facilities such as buildings and spaces used by or for job generating uses and community and social gathering purposes, such as pubs, shops and Post Offices.” <http://eastdevon.gov.uk/planning/planning-policy/local-plan-2013-2031/>

**3 - Contrary to policy D1 (Design and Local Distinctiveness)**

The DMC considered that the application of 1st March 2013 would be “harmful to the visual amenity and character of Station Road”.

The plans under the current application do not threaten Station Road immediately – and yet, such is the height and mass of the proposed development, in the so-called ‘Dell’ taking up the car park as well as the larger ‘Plateau’ above, there would clearly be considerable “loss of amenity and character to this area” – not only for Station Road, but for large parts of the town and beyond.

This has been demonstrated by several photo-montages:

<https://saveoursidmouth.com/2016/05/18/visual-impact-of-developers-plans-for-knowle-raises-concerns/>

Furthermore, the Knowle grounds are immediately adjacent to the East Devon Area of Outstanding Natural Beauty – and as such are afforded more protection than the planning application refers to:

<http://eastdevon.gov.uk/media/1167579/combined-dmc-agenda-120612.pdf>

As for the Policy D1 in the adopted Local Plan, it is difficult to see how the current planning application cannot be rejected, as it fails to observe the key demands - notably with regards to 'the scale, massing, density and height' of the buildings:

**D1 - Design and Local Distinctiveness:**

In order to ensure that new development, including the refurbishment of existing buildings to include renewable energy, is of a high quality design and locally distinctive, a formal Design and Access Statement should accompany applications

setting out the design principles to be adopted should accompany proposals for new development.

Proposals should have regard to Village and Design Statements and other local policy proposals, including Neighbourhood Plans, whether adopted as Supplementary Planning Guidance or promoted through other means. Proposals will only be permitted where they:

1. Respect the key characteristics and special qualities of the area in which the development is proposed.
  2. Ensure that the scale, massing, density, height, fenestration and materials of buildings relate well to their context.
  3. Do not adversely affect:
    - a) The distinctive historic or architectural character of the area.
    - b) The urban form, in terms of significant street patterns, groups of buildings and open spaces. <http://eastdevon.gov.uk/planning/planning-policy/local-plan-2013-2031/>
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#### **4 - Contrary to policy EN9 (Extension, Alteration or Change of Use of Buildings of Special Architectural and Historic Interest)**

Whilst the rejected application of 2013 referred only the Grade II Listed Lodge as being threatened, there is also the Grade II Listed Summer House to consider.

In fact, the Heritage Statement put together by consultants Kensington Taylor in 2012 was rather damning of the quality of the setting of the summerhouse: “The report claims that the buildings and grounds are ‘much altered’ and that ‘the setting of the listed Summerhouse is already much compromised and divorced from the original integrity of the extended grounds.’ This understanding of the setting is in much dispute, as has been made clear by the submissions from established bodies including the Devon Gardens Trust and SAVE Britain’s Heritage.” <https://saveoursidmouth.com/2012/10/28/critique-of-the-heritage-statement-for-the-revised-plans-for-the-knowle/>

As far as the 2016 Heritage Statement is concerned, it clearly intends to diminish the value of the 'setting' of the heritage asset - thereby justifying the building on the terraces immediately above the Summerhouse: “Although there is still historic and visual linkage between the asset and the Knowle, the degree to which the structure is perceived as part of a Victorian garden landscape has, however, been almost entirely lost.”

<http://planningapps.eastdevon.gov.uk/Planning/StreamDocPage/obj.pdf?DocNo=2267528&PDF=true&content=obj.pdf>

This has been contested by national and county heritage bodies:

<https://saveoursidmouth.com/2016/05/30/throwing-away-our-heritage-london-based-save-vehemently-objects-to-plans-for-knowle/> and <http://www.devongardenstrust.org.uk/?q=node/176>

To quote again from the DMC of March 2013, the newly-proposed development would therefore be contrary to policy **EN9 (Extension, Alteration or Change of Use of Buildings of Special Architectural and Historic Interest)**