

Planning Application: 25/0057/FH

66-68 Sandgate High Street – 9 Residential Flats across 4 storeys plus Roof Space

In relation to the recently submitted application 25/0057/FH we currently object subject to the satisfactory resolution of the following comments:

- Scale & Massing – current proposals for a 5 storey development are incongruous to the Character Area and are contrary to the following adopted policies within the Sandgate Design Statement 2020:  
  
SDS 5 – proposals are not of an appropriate scale or ridge height within its Character Area, additionally proposals should not overwhelm neighbouring properties.  
  
SDS 6 – proposals do not respect the roofline and building height of adjacent buildings.
- Daylight & Sunlight – for proposals of this scale we would expect such an application to be supported by a Daylight & Sunlight Analysis that clearly demonstrates that proposals do not create an unacceptable or detrimental loss of daylight and sunlight to neighbouring properties' amenity or living spaces; in particular our property Underhill Cottage and the properties to the rear along Gough Rd.
- Vehicle Parking – given that under Policy HB3, Places and Policies Local Plan 2020, proposals should provide 1 parking space per unit, we would request justification as to why it is appropriate for 8 parking spaces to be provided for 9 residential dwellings.

Additionally we request that a suitable Safety Audit is undertaken to demonstrate that the inclusion of 3 spaces on the Upper Ground Floor is appropriate given that vehicles will be required to reverse out on to the Undercliff and in extremely close proximity to a blind bend.

- We consider that the application does not show an understanding of the area's characteristics and does not demonstrate that the proposed changes improve and enhance the area and so does not comply with NPPF 2019 and the District Council's Development Plan.

Please see below for further substantiation for these comments:

- 1.) Comments on Design
- 2.) Technical Observations

Please also note that the above comments are not exhaustive and there are further notes of concern below and observations that we request are either responded to or given due consideration.

## 1.) Comments on Design

i) The Planning Statement acknowledges there are clear building lines within the High Street Area with three or four storeys being common place on pages 11, 14 and 16.

The submitted Design & Access Statement also reiterates this on pages 5 and 11.

Page 11 of the Design & Access Statement notes that following a careful analysis a key design principle was identified being:

*Three storey frontage on the High Street, rising to four storey at side & rear, with a hipped pitched roof and dormer windows above. Parapet height to align with adjacent buildings*

Proposals seem to ignore their own analysis presenting a 5 storey solution.

This 5 storey proposal is then further raised by an additional 750mm to bring the ground floor habitable rooms above the ascertained 7.2m AOD acceptable floor level.

This would result in the only five storey development on this side of the High Street and so would be discordant to its surrounding context.

The Design & Access Statement relies upon the rear of the proposed development to justify its Massing & Scale stating that due to the sloping topography of the site this results in a modest storey 2.5 height which is consistent with the scale and massing of the existing buildings to the east of the site (56-60 High Street & the attached Masonic Hall facing Gough Road) and also those on Gough Road which are generally of a larger scale than those on the High Street.

This is shown on the submitted drawing 23.34.PL02C.

This scale and massing is however unfortunately carried through to the front and primary elevation which would be entirely incongruous to the streetscene, as shown on submitted drawing 23.34.PL02C.

Submitted drawing 23.34.PL03C relies on the ridge lines of the properties on Gough Road.

These are not sited on the High Street and so provides an unfair representation in order to justify the disingenuous ridgeline.

Furthermore proposals would produce the only building in the area with an ungainly 2 storey pitched roof which would be entirely at odds with the local vernacular.

The Design & Access Statement then goes on to seemingly dismiss the scale of the adjacent Chichester Memorial Hall as something of a 'one-off' and not typical of adjacent buildings on this side of the High Street.

The Chichester Memorial Hall is a well considered and proportionate building commensurate to the scale of its plot and whilst it is a 'one off' in terms of being the only large scale 2 storey community building within the area it is not the only 2 storey property on this side of the High Street.

With reference to the submitted drawing 23.34.PL03C, if this was extended to include end of the short adjacent terrace to the West and neighbouring property it would include Vine Cottage, 84 Sandgate High Street.

This similarly as a detached property provides a complimentary bookend to the terrace in the form of a 2 storey Grade II Listed dwelling also being commensurate to the scale of its plot.

There are in fact a number of 2 storey properties along this side of the High Street and so the scale of the Chichester Hall should not be dismissed and proposals should present a respectful relationship to this important local historic building as does its immediate adjacent neighbour 72a Sandgate High Street.

This blinkered approach would result in a glaring jar to the consistent unifying ridgeline of this side of the High Street and fails to reflect the scale of its immediate built context.

As noted above this is contrary to adopted policies within the Sandgate Design Statement 2020:

SDS 5 – proposals are not of an appropriate scale or ridge height within its Character Area, additionally proposals should not overwhelm neighbouring properties.

SDS 6 – proposals do not respect the roofline and building height of adjacent buildings.

ii) The Planning Statement notes the position of the Scout Hut stating proposals would obscure this building suggesting that this is a benefit as it does not contribute to the setting of the Conservation Area.

The Design & Access Statement suggests the current arrangement creates a significant break in the consistent building line which detracts from the distinctive character of the streetscape.

Whilst we accept that the Scout Hut is a building of poor quality it is low-lying and subservient to its surrounds and so does not overly detract from the setting of the Conservation Area.

It is also considered that the scale and siting of the current garage provides a welcome break in the rhythm of the street scene offering views to the beginning of the Escarpment Character Area.

SDS 5 of the Sandgate Village Design Statement Reviewed in 2020 calls for massing and orientation to ensure that physical barriers obscuring views to the woodland escarpments are not created as such proposals should give greater consideration to this.

iii) The Design & Access Statement notes that windows have been carefully positioned to avoid overlooking issues, with obscure glazing utilised where appropriate, however upon reviewing the submitted information, no detail has been submitted in this regard.

We would request that additional information be submitted that clearly sets out how the amenity and living spaces of the surrounding properties have been properly considered.

## 2.) Technical Observations

i) Places and Policies Local Plan 2020:

Policy HB3 includes the National Internal Space Standards that new dwellings should meet:

*Planning permission will be granted for new build residential development and conversions for residential use where the proposed scheme:*

*Provides an area of private open space for each new or converted dwelling as one or both of the following:*

- i) A private usable balcony area with a minimum depth of 1.5m for flats, as long as this does not reduce the privacy of neighbouring dwellings;*
- ii) An area of private garden for the exclusive use of an individual dwelling house of at least 10m in depth and the width of the dwelling. In the case of infill developments there should be sufficient space retained for the original dwelling;*

Only 3 of the 9 proposed flats incorporate balconies.

For the balconies included, these do not appear to be of the required minimum depth of 1.5m, with an absence of any amenity space for the remaining 6 properties.

Additionally neither the Design & Access Statement nor the Planning Statement demonstrate how this policy is being met.

- ii) Policy T2 sets parking standards and if these are not met a parking survey / report should be provided.

For such a development, this calls for 1 space per unit.

Proposals are for 9 residential units yet only 8 parking spaces are provided.

In relation to the 8 provided spaces 3 of these spaces are provided on the Upper Ground Floor.

The provided Vehicle Swept Path Analysis shows that upon entry 1 of the 3 vehicles would have to undertake a reversing manoeuvre back out on to the Undercliff in order to successfully forward park into their allocated space, and all 3 vehicles would need to undertake a reversing manoeuvre back out on to the Undercliff in order to successfully exit the parking area.

Given the potential number of Trips that this development would generate and the close proximity of the blind bend where this reversing would occur we would request that a suitable Safety Audit be undertaken to support whether these 3 particular allocated parking spaces are indeed viable without causing undue risk to users and other road users.

### 3.) Final Considerations

Given the likelihood that some form of proposal for this site will come forward from this Applicant we have taken the opportunity to review some of the more recent developments that this Applicant has delivered within the District.

In reference to 20/0532/FH and the 19No. 1&2bed apartments that has recently been completed as part of the Royal Victoria Hospital scheme we note that the approved elevations gave the opportunity to provide a building of quality.

However for reasons unknown through the execution phases a number of details have presented themselves that were not shown on the original planning drawings which include an

extremely unfamiliar grey UPVC banding substituting the originally proposed brick feature detailing which along with poorly considered rainwater good detailing which has had the cumulative effect of resulting in a prominent but unfortunate building.

Given this, and fear of history repeating itself, we request that should the Local Planning Authority be minded to grant an approval such details are secured in perpetuity prior to the granting of a permission.

Whilst we are not opposed to proposals coming forward for this strategic site within Sandgate Village, and acknowledge the potential need for housing within the District, we strongly believe that current proposals cause significant and demonstrable harm to the Conservation Area through their form, scale and mass.

Any forthcoming proposals should work a great deal harder in terms of architecture, articulation, detailing and give far greater consideration to preserving or enhancing the character and appearance of the Conservation Area, the Character Areas and Sandgate High Street.