

Planning Application: 25/1410/FH

66-68 Sandgate High Street – 8 Residential Flats across 4 storeys plus Roof Space

Resubmission of:

25/0057/FH – 9 Residential Flats across 4 storeys plus Roof Space

In relation to resubmission application 25/1410/FH we unfortunately maintain our objection and would like to make the following comments whilst making reference to our previous letter of objection registered 11.02.25 included below.

From our previous letter, the principal items of objection were:

- Scale & Massing

We acknowledge the amendments to lower the ridge line by 500mm and reduced mass of the roof frontage as demonstrated on drawings 23.34.PL02&3G, however the form and height still incorrectly relies on the properties along Gough Rd to justify the ridgeline rather than the relevant property fronting the High Street (50-60 High Street and attached Masonis Hall)

Proposals would still produce the only building in the area with an ungainly 2 storey pitched roof which would be entirely at odds with the local vernacular with the nature of the 5 storey development also being incongruous to its surrounding context as the amended proposals still clearly do not respect the roofline and building height of adjacent buildings.

Whilst the submitted CGIs are helpful in terms of understanding architecture and materiality they wrongfully suggest the relationships between the proposed eaves levels of the front elevation and the eaves levels of the adjacent properties.

‘Existing and Proposed Illustrations’ show the front proposed parapet height aligning through with the existing eaves height for the Chichester Hall.

‘Existing and Proposed Illustrations – East View’ show the front proposed parapet height aligning through with the existing eaves height of 50-60 High Street and attached Masonis Hall.

Given these two adjacent properties are different heights then this arrangement is not possible.

From drawing 23.34.PL03G the proposed parapet height is circa 1m higher than the eaves height of 50-60 High Street and circa 2m higher than the eaves height of the Chichester Hall.

As such we request the CGI is updated to present a better representation of the actual development or dismissed as being disingenuous.

The CGIs also provide no context for the longer views from Granville Road West which should be a key consideration to the assessing the building and its setting.

- Vehicle Parking

Within our original letter of objection we raised observations against the rear parking arrangement in so much that as being accessed from the Undercliff all vehicle movements resulted in a car reversing out into the Undercliff and in close proximity to a blind bend with no external edge protection and a not insignificant drop on the other side which has been an ongoing historic concern.

In further discussions with KCC Highways on the previous application they advised that although the access to the upper parking area is limited and on a bend in the road, it is an existing access to a site with lawful use as a sales garage. When considered against this lawful use, the development would not result in a worsening of highways safety impacts.

Whilst we understand this as an approach we do not agree that the use of this access point for residential purposes is a continuation of a safe and established use.

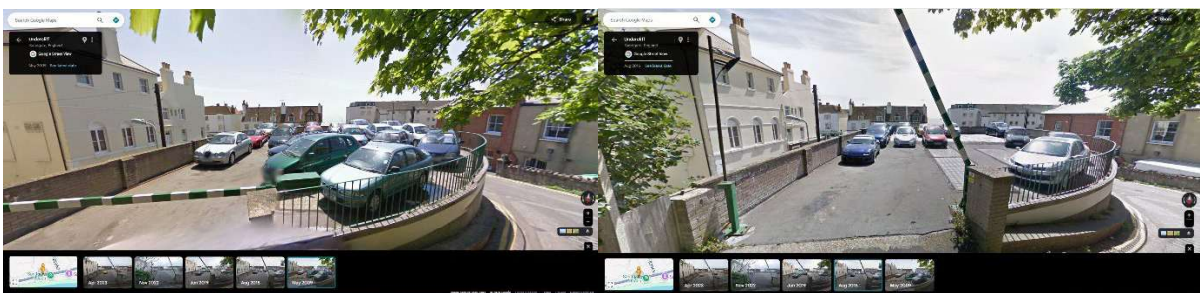
As a garage show-forecourt, all vehicles were reversed onto the upper platform and exited on to the Undercliff in a forward motion which is significantly safer in terms of visibility splays and the adjacent unprotected bend.

This can also be seen from google map historic aerial views that show all cars parked facing forward to exit for the last 15 years.

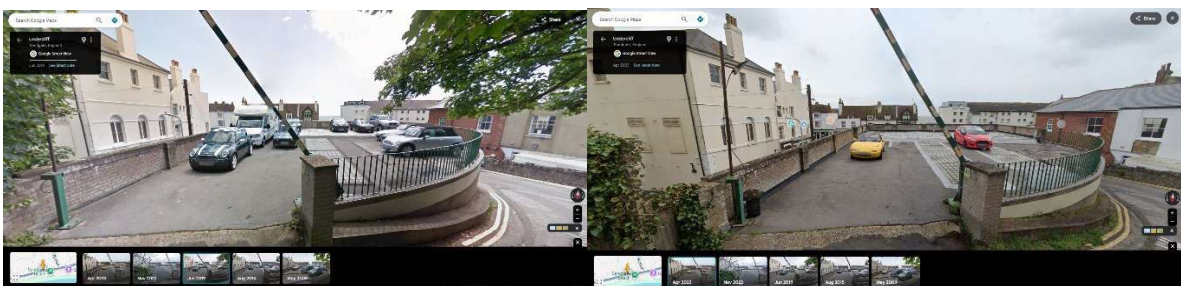
This can be also seen from the photo included on drawing 6318-CON-00-XX-DR-T-1900, which is the same as the 2009 Google Street View.



Views of bend



Google Street Views – May 2009 & Aug 2015



Google Street Views – June 2019 & April 2023

A simple resolve would be the loss of one parking space to the rear which would allow vehicles to safely turn within the body of the site.

Additionally we support the Sandgate Society's previous suggestion to place a condition on approval of planning that residents who would be allocated one space per flat are not allowed to additionally apply for a parking permit.

- Summary

Whilst we welcome the submission of amended proposals they simply do not go far enough to provide a sympathetic resolution to this strategic site whilst preserving or enhancing the character, appearance of the Conservation Area, the Character Areas and Sandgate High Street, and in their current form we consider would cause significant and demonstrable harm to the Areas through their form, scale and mass.

We consider that a resolution to all these points, and many below, would be to remove the uppermost floor, this would:

- remove the ungainly 2 storey pitched roof which would be entirely at odds with the local vernacular
- allow a skelining detail to be introduced that allows the eave line to be aligned so that it does carry through from 50-60 High Street and as the CGI clearly shows would be a preferred arrangement
- alleviate concerns regarding longer views from Granville Road West
- remove one unit which in turn would allow the removal of a parking space to the rear, offering opportunity for a safe internal turning area whilst maintaining a 1:1 parking ratio.

Lastly should the local planning authority be minded to grant a permission we request that 1:10/1:20 detailing are secured in perpetuity prior to the granting of a permission and to ensure the highest possible quality for any potential development.

Planning Application: 25/0057/FH – (registered 11th February 2025)

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.