

Forensic examination of Gladedale's amended application reveals a catalogue of failures, discrepancies and false claims. If planning consent is granted on such an inadequate application it would inevitably lead to piecemeal adjustments being made on the hoof as the development progressed, leading to further infelicities.

By Janette Gallini

1] There was inadequate consultation, both professional and public

- The development proposal was not sent for review by CABE or the Regional Design Panel
- No proper consultation with local residents was made.

Consultation with Key Stakeholders, The Burtons' St Leonards Society and The Mount Residents' Association, was minimal despite their attempts to arrange meetings with the developers.

The public consultation was:

- Very poorly publicised – there was no press advertising, posters were only put up in the College, many immediate neighbours received no notification [the mailing list shows 325 neighbours within a select radius were invited, not over 450 as reported]; most other residents were completely unaware of the event.
- Held for a mere 5 hours on a Thursday afternoon.
- The times were not consumer-friendly - 3pm onwards is not a time of day when school-run mums are free to view important information, while an 8pm finish is too early to catch London commuters – both groups who might have been thought to have an interest.
- Held in tandem with proposals for the St Saviours Road site: identical figures for signed-in attendees [46] and respondents to the tick-box feedback form [59] are quoted in the 'Public Consultation' documents of both planning applications, despite the fact that only 76 neighbours of St Saviours were invited.
- Very poorly presented – concept sketches and mood boards did not convey adequate information.
- Held at a point when the developers' overall concept was already unchangeable.

2] The inadequacy of the updated Historic Asset Statement

- The updated Historic Asset Statement does not reflect the broader remit of the term Heritage Asset as defined by PPS5:
'Heritage assets are the valued components of the historic environment.'
- PPS5 defines historic environment as
'All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora. Those elements of the historic environment that hold significance are called heritage assets'

and significance as

‘The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic.’

- The nature and character of the two Conservation Areas [designated Heritage Assets] are not discussed in terms of the integral relationship of the site with the landscape and architecture associated with the design of St Leonards by James and Decimus Burton.
- The part of the site defaced by the College buildings retains the topography, site boundary lanes and vegetation cover of the original Archery Ground; but the Statement refers only to it in terms of its role as a setting for the Listed Building.
- The Statement’s evaluation of the impact of the development is flawed by a lack of understanding of the design principles behind the original development; the ‘long sight-line’ to which they refer [see also Mr Simon Cocks’ letter 4th May 2011 ‘long views of the listed terrace all the way through the site’ and the Landscape Design Statement p5 ‘opening up vistas and defining views’] is a concept alien to those original principles, in which views and vistas grew organically from the shape and form of the landscape and the architecture within it.
- Failing to ascribe significance to the Archery Ground in its own right also means that no mention is made of the impact of a perimeter of buildings that will prevent views into the centre of the site, particularly from Archery Road East, which at present reveal the topography and add to the sense of place.

3] There is insufficient information to make an informed decision

There are mistakes, discrepancies and omissions in the following revised drawings and documents. Many are minor easily corrected mistakes, but the cumulative effect, along with some very serious errors such as this first one, makes for a proposal that would not seem to be committed to attention to detail.

1. Discrepancies materially affecting the Accommodation offer

DN 122 House Type 5} Both house types are labelled ‘**4 BED**’.

DN 123 House Type 6}

A quick glance at the plan shows that Type 5 is **in fact** a **3** bedroom house and Type 6 has **3** bedrooms marked, with a ground floor room marked ‘Optional additional bedroom/study’ – effectively a 3 bedroom house with an extra reception room. This materially affects the accommodation offer, reducing the number of **4 bedroom** houses to **15** and bringing the **3 bedroom** houses to **16**.

Consequently, any list of accommodation, such as p12 of the Addendum to the Design & Access Statement, or p3-4 of the Interim Travel Plan March 2011, p10 of the Environmental Impact Assessment Addendum and p3 of the Transport Assessment Addendum, are all incorrect.

2. Discrepancies affecting the nature of the Accommodation

DN 112 Plan Block D:

- Ground floor plan does not show window on west elevation. [see DN 132]– addition of window to first floor plan since first submitted, but not to ground floor.
- Lower ground floor plan does not show access to gardens for flats D2 and D3. D3 opens on to a balcony, D2 has a glazed feature corner, but no opening garden

door [Compare DN133, where D3 balcony is omitted and D2 has full length glazing- presumably indicating access doors.]

- Very low kitchen window (see DN 132).

DN 113 Plan Block E:

- Ground floor missing canopy over western entrance onto access road [see DN 133]
- Bathroom windows positioned high above bath – possibly inaccessible to occupants [see DN132, North and South elevations]
- Lower ground floor plan does not show access to gardens; E1 has no opening garden door; E2 and E12 open on to balconies. [Compare DN132 where E2 and E12 have been amended, but not E1].

Why has E11 no access to the gardens, alone of all the lower ground floor flats in Blocks D and E, despite opening from the living room onto a balcony, as others do? The Landscape Proposals show a black metal railing fence dividing the gardens between E12 and E2 right across the outlook from E11. Surely some mistake?

DN 118 House Type 1;

- Full height window marked on ground floor plan, but starts at first floor on side elevation.

DN 134 Block J – Proposed elevations

North /South elevations:

- Very low kitchen windows – not very useful or pleasant as windows.

East elevation:

- Very high bathroom windows, positioned over the bath [see Plan DN115] These could give access problems.
- Cycle store is shown, as on plan DN115, but is omitted from the elevation key.

The cycle store does not appear on Proposed Site Layout DN102, or Landscape Proposals DN 1642.L.280, or in the Landscape Design Statement, which has consequences for the Landscape Proposals, see below.

DN 136 Block M – Proposed elevations

North/West elevations:

- Very low kitchen windows as Block J [see plan DN117]

DN D1642.L.260 Landscape proposals

Block D is shown with an area of paving and grass, down the side of the block leading to the garden outside Flat D1. It is gated at both ends, and it is not at all clear whose responsibility it would be. It has no direct access from the flats, and would be very dark and shady, right up against the perimeter trees. If it relates to D4, would access be permitted for D1 to traipse through to their 'garden'?

Similar problems might arise at the back of Block C, where an access path is shared – the owners of the more southerly four houses would never be able to lock the back gates in case the owner of the penultimate house needed to use the alley.

Block J is shown with

- A paved area outside the front door, which would be covered by the cycle store.
- Hedging round a tarmac area to the north of the front door with a gate that would be inaccessible because of the cycle store [see DN 134, note above]. This tarmac area would serve no purpose whatsoever.

- An inaccessible 'amenity grass area' completely surrounded by hedging and shrubbery and inaccessible paved areas in the amenity area - outside flats J2 and J4, [covered by balconies] and outside flat J3's balcony.

3. Discrepancies and omissions affecting the ability to assess the proposals

DNs110, 111 Plans Blocks A and B;

Levels labelling does not correspond with Site Sections DNs 140, 141, 143, or Elevations DN130

Plans start at ground floor and work up to sixth floor, elevations and sections start at basement and go up to fifth floor. This makes the sections difficult to assimilate in terms of the plans, and makes it appear that the whole edifice is five floors, or possibly six, not seven, high.

DN130 Blocks A and B – Proposed elevations

East elevation:

- Block B third floor; Block A fifth floor [part]; Block A sixth floor. All are shown incorrectly as recessed behind a balcony; compare south elevations Blocks A & B and north elevation Block A, and plans DN110, 111. [Jane Stephens report Jan 2010 'top floor accommodation to be set back on all sides'.]
- External Materials list: no mention of louvres for car park window embrasures.

DN140 Site Sections/Street Scene elevations/ Sections A-A/B-B

Site Section A-A;

- Block C: drawn with a mix of facades between the houses of this terrace of 3 pairs of houses; Proposed Site Layout DN 102 and DN140 June 2009 show: 2x Type 2 houses, 4x Type 1.
 - The northernmost pair, next to block B [Type 2 on DN102] is shown as having a revised Type 2 garage and front door [DN119], with a revised Type 1 render bay breaking the roofline [DN118].
 - The central pair is correct as Type 1 houses as per DN102 and DN 118 revised.
 - The southernmost pair [Type 1 on DN 102] has revised Type 1 front door [DN118], with revised Type 2 windows and balcony [DN119]

This mix of elements may be possible, but must affect the accommodation, and is not supported by any plans or elevations [DN118, DN119].

- Block C: Solar panels shown [see DN 118,119]

Site Sections AA and BB; Block M: Lift shaft not clearly delineated.

DN141 Site Sections/Street Scene elevations/ Sections C-C/D-D

Site Section C-C:

- Block F; Type 2 houses shown with revised balconies but not revised [render] finish, and with solar panels [see DN 119].
- Block F; Terrace is drawn here as: 4x Type 3, 1x Type 4. [Compare DN 102 as: 1x Type 1, 3x Type 3, 1x Type 4] Type 3 houses all unrevised, Type 4 second floor front elevation balcony revised, first floor unrevised.

The southernmost house is consistently drawn in elevation as Type 3, but DN102 shows it as Type 1, as do other site plans [eg Landscape Proposals]. Which is it?

Site Section D-D:

- Block M; feature glazed corner block shown unrevised, with no overhang on the south and east elevations [DN136]
- Block L; solar panels shown on Type 2 houses [see DN119]
- Tree planting incorrect – landscape proposals show 4 trees, at the edges of the pairs of plots of Type 2 houses. This makes quite a difference to the look of the street.

DN142 Site Sections/Street Scene elevations/ Sections E-E/F-F

Site Section E-E:

- Block H; Terrace of 1x Type 5, 4x Type 6, 1x Type 5.
Shown here: Type 5 not revised [roof windows, windows, balconies, render, see DN122], Type 6 not revised [roof windows, windows, render finish, see DN123].
- Block G; Type 1 houses; there appears to be some sort of bridging roof between the lower two pairs of houses – this does not appear on any elevation, site plan or landscape proposal. Solar panels shown [see DN 118]
- Boundary to Block J shown as solid wall– Landscape Proposals detail black metal railings.
- Tree planting shown for Blocks H and G is inaccurate; Landscape Proposals show 1 tree north of Block H but none for the other Block H houses. 2 more are positioned one either side of the first pair of Block G houses; and one either side of the central pair of Block G houses. Again, this makes a difference to the look of the street.

Site Section F-F:

- 20 West Hill Road is shown in ghost outline.
- Elevations of Blocks G and C houses [both Type 1] not the same - Block C is missing all large windows, Block G is missing ground floor large window [see plan DN 118]
- Boundary of Block C incorrect - gate in fence not shown, metal railings not indicated. Large tree incorrect – they have all been removed at this location; small tree should be closer to the boundary. Other trees not accurate.

DN143 Proposed G-G and H-H

Notes to both Sections claim to base the indicative heights of surrounding buildings on Topographical Survey glad/1010002. This is not included in the application package; Topographical Survey glad/705032, which is in the application, does not include heights for Highland Gardens [Section G-G] and Mount Lodge [Section H-H], but does for Crabtree House.

Site Section G-G:

- Section of Block A inaccurate: southern bay of lowest floor drawn at height of lower parking level, not intermediate.[compare Section A-A DN 140].
- Indicative height of Block A: eaves 62.57m, parapet 62.875m.
Compare Landscape Visual Impact Assessment [addendum] fig No 4A [addendum] where Block A is 67.00m; but Elevations DN130 show fifth floor at 59.578mAOD.

On the evidence of Elevations DN130, the LVIA must be incorrect here. It is worth pointing out that this extra 12ft height did not give the assessors pause for thought in their opinion that the roofline of Block A would just be 'glimpsed' through the trees.

- No indicative height given for eastern wing of Block A.
- Height of ground south of Highlands Gardens, at first floor level, as marked, is incorrect. For 57.575m, read 47.575m [DN130]

Site Section H-H:

- Indicative height of Crabtree House: parapet shown 68.690m. Compare LVIA, [above] and Topographical Survey June 2007 glad/705032] where both show Crabtree House as 65.41m.
- Height of ground west of Mount Lodge, at first floor level, as marked, is incorrect. For 57.575m read 47.575m. [DN130 as before]
- Height of Archery Road by Mount Lodge incorrect: for 58.40m, read 48.40m [Topographical Survey as before].

Section HH has been taken at an angle that just misses both Block J and the top floor of the eastern wing of Block A. This latter is represented only in ghost outline, which makes the section somewhat misleading. Block J is not represented on any site section.

The confusion over indicative heights makes it difficult to accurately predict the impact of Blocks A and J on Archery Road West and Highland Gardens.

- At a built height of 16.45m [Townscape and Visual Impact Assessment Addendum p2] and footings at 44.575 [Elevation DN130] Block A would be 61.025mAOD – not as shown above 62.875m to the parapet, with additional height for the lift shaft; nor the 67.00 of the LVIA fig 4. So what is the true height of Block A?
- The impact of Block A is affected by the site of the section. The centre of the roadway at the foot of Highland Gardens is 50.72m, [TS], not 52.500m as shown on section G-G, where Archery Road is higher. At its closest point, using the parapet height given in Section G-G [62.875], Block A would be 12.155m above the roadway, nearly 40ft not 35½ft as implied here.
- Crabtree House indicative height is shown here as 68.690m but shown at 65.41m on the LVIA and TS.
- Townscape and Visual Assessment Addendum, p 4 says Block J's built height has increased by around 3m to 13.43m, indicative height shown here as 63.34m AOD. But the accompanying LVIA figure in 2009 showed Block J at 59.90m AOD, which would be an increase in building height of 3.53m; it is now actually only 2m lower than Crabtree House.

DN 145 Proposed Street Elevations A and B

Street Elevation A; this is little more than a colour version of the east elevation on DN 130, and suffers from the same mistakes [see above].

- The screening value of the retained tree belt seems more wishful than accurate; two replacement trees are incorrectly shown planted to the east of the retained trees [see Landscape Proposals] and three more within Block C house's garden rather than on the roadside.
- The boundary treatment is incorrect – Landscape proposals show black metal railings down to the corner of Block C, then a rendered wall topped with railings. This drawing shows close boarded fencing, which in fact starts lower down the block, separating the gardens from the boundary railing and making a back alleyway.
- There is not enough of Block C shown to appreciate the impact of the block on the street scene, although it looks to be quite strong from the one house shown.
- Highland Gardens is shown only as a void – this does not contribute to our understanding.

Street elevation B; this offers little that cannot be deduced from the elevations [DNs 132,133.

- There is no Conservation Area context in the shape of 16 and 18 West Hill Road, or the relationship with the Archery Road boundaries below 'Bannow'.
- By its nature as a street elevation, it can offer no information on the relationship with Block B, behind.

DN 146 Proposed Street Elevations C and D

Street Elevation C; this is a colour version of Section D-D [DN141].

- This repeats the same mistakes [see above] the only new information is the boundary treatments.
- 14 West Hill Road remains a ghost.
- Again, offers no information on the interior of the lower courtyard at the back of Blocks L and M, or the Listed building beyond.

Street Elevation D: a colour version of Section E-E [DN142]

- Part of Block J is missing.
- Carries the same mistakes as Section E-E [House Types not revised].
- Offers no new information, no context of the surrounding area, no opportunity for views across the site.

The Landscape Design Statement

p9. There is no picture or detail for the corner of West Hill Road and Quarry hill, which is important as the entry point to the development area, and the fulcrum of the relationship between the development and the Conservation areas.

p12. Soft Landscape Materials Palette

This list of trees and the colour illustrations are incorrect. They have not been revised, but refer to the list on the Landscape Proposals June 2009.

p13. There is also no picture of *Amelanchier Lamarckii*, which is a major contributor to the overall scheme with around 30 of them to be planted throughout the site.

Comments on the Colour Views

Colour view 1:

- As discussed above, the bulk of Block A would be very prominent; 15 years would be a long time to wait for it to be screened.
- The species selected, *Tilia cordata* 'Greenspire' and *Fraxinus excelsior* 'Westhofs Glorie', are to be planted alternately at regular intervals round the curve of the site.
- Commercial plantsmen recommend this Ash [*Fraxinus*] for infrastructure planting, avenues, and car parks. It rarely seeds and will grow to 5m x 8m in 25 years.
- The Lime [*Tilia*] specified is a clone, grown for its regularity, 'a very popular choice for urban planting where its uniformity is preferred over the native *Tilia cordata*' It is broadly conical, 'an excellent street and avenue tree' and grows to 5m x 10 m in 25 years.
- Given that Block A is planned to be higher than 10m, it may be that the specified trees would not grow high enough to screen it, certainly not before 25 years, possibly never.
- If it should happen that the retained trees were to die or have to be felled because of disease, damage, or excessive overshadowing of the apartments of

Block A, the end result would be an alternating band of sterile, uniform trees as may be seen round the edge of any industrial park in the land.

Colour view 2:

- This clearly shows how overbearing Blocks D and E would be in relation to Archery Villas. Their mass and height bully the gracefulness of the Burton buildings.
- 16 and 18 West Hill are both hidden by a tree, so no appraisal of the relationship with these Conservation elements is possible.

Colour view 3:

- Along with views 1, 4 and 5, this has little more information than the 3D concept views on p28 of the original Design & Access Statement.
- While the retaining wall is included for the first time, conveniently lush vegetation obscures any sight of 'Bannow' [formerly 'Hazelton'].
- It does, however, just about show how very close to Archery Road Block D would sit.

Colour View 4:

- This view has removed the retained Holm Oak that is such a prominent feature of this corner, so its value is limited, especially as there is no street-scene context.
- Block L house [Type 2] side wall is incorrectly shown as render to the ground floor, thus failing to tie in with the brickwork of Block M.

Colour View 5:

- Block G house [Type 1] shown with wrong chimney, and solar panels.
- Like the original concept sketch, this ignores the lie of the land, the boundary walls, and the neighbouring properties.

Views 3, 4 and 5 relate to three of the 'visually prominent focal points' identified back in 2007.

- View 3 'would form the eastern 'gateway' into the development in conjunction with the easternmost villa of Archery Villas. It would also need to form a positive visual relationship with the Norman Shaw-designed Listed property immediately to the north-east [formerly named 'Hazelton']'.
- View 4 should 'bring a very positive architectural quality to the immediate street scene'.
- View 5 'would form the southern 'gateway' into the development in conjunction with the Decimus Burton designed Listed property 18 West Hill Road.'

[Letter Tim Cookson to Tim Hulme, 24th September 2007].

The views should be assessed in terms of the above design principles.

Colour View 6:

- The southernmost of the upper range of Block F houses is shown as Type 3, not Type 1. [see note on DN141, above].
- Block C house on the extreme right of picture is drawn as Type 2, not Type 1 as per DN 102. [see note on DN140, above].
- The pink flowering trees [*Prunus serrula*] have been dropped from the list in the revised Landscape Proposals – all flowering trees now specified have white or palest pink flowers.
- Block B is clearly seen to be five storeys high, undermining Mr Simon Cocks' assertion that 'the visual impact of the building is reduced, being only 3 storeys high where it fronts the central landscaped square'. [Letter 4th May 2011].

- The terrace of four houses does not present a lively street environment, but at ground floor level looks what it is, a row of lock-up garages; while the great grey barrier of the top floor of Block B looks like a train-washing shed.

It is noticeable that there are no views looking north and south through the site, to show just how much of the Listed building can be seen and appreciated by the residents and visitors. Since the developers tell us they have 'enhanced the setting' and 'revealed the significance' of Archery Villas, why is there no view to prove their point?

In January 2010, under the title of 'Missing Information', Conservation Officer Jane Stephens specifically asked for:

- site cross-sections clearly showing new and old levels across the site
- contextual drawings of the site levels and scale of the development in relation to the surrounding conservation area
- floor plans and elevations of all sides of each housing block are required [it is not sufficient to just illustrate the house types – we need to see them as a group].

These drawings are so full of errors, and reveal so little of the required contextual information, that it would be against all common sense to approve the application on the strength of them. No-one would have a clue as to what had been approved.

4. Errors or misleading information concerned with Transport

Car Parking

The application package has a number of statements on car parking, expressed in a variety of ways: by apartment type, by design type [external, covered etc]. The total figures remain the same – 189, of which 10 are visitor spaces, and 47 relate to the family houses.

The developers say [Transport Assessment Addendum p6]:-

The parking allocation includes approximately 1 space per unit for the flats and 1.5 spaces per unit for the houses, plus 10 overall visitor spaces. This includes 18 spaces for the mobility impaired.

A count-up across the site on DN 102, and on plans DN 110,111 show the true case.

Apartment parking provision

Block A + J = 33 apartments;	block A = 36 spaces	= 3 visitor spaces
Block B = 25 apartments;	block B = 27spaces	[3 disabled] = 2 visitor spaces
Block D = 14 apartments;	parking court = 14 spaces	[2/4 disabled] = 0 visitor spaces
Block E = 20 apartments;	curtilage parking = 5 spaces	
Block F = 6 apartments;	curtilage parking = 4 spaces	[1 disabled]
Central area parking for Blocks E and F = 18 spaces [5 disabled] = 1 visitor space		
Block K = 27 apartments;	undercroft parking = 12 spaces	
Block M = 7 apartments;	parking court = 16 spaces	[5 disabled] = (-6 spaces)

Totals 132 apartments; 132 spaces; of which, 16/18 disabled and 6 visitor spaces

As a bare figure, it seems to work, at one space per unit, within the 75% Zone 4 mitigation. However, the distribution of the parking means that total parking for Blocks K and M [34 apartments] is 28 spaces. Either 6 out of the 7 Block M flats, or Block K,

the premier site of the whole development, are lacking the basic requirement of one parking space per unit.

The remaining spaces counted by the developer are 31 driveways/hard-standings to 31 houses, 16 of which also have integral garages; this is the origin of the 1.5 spaces per house – but in fact, 16 have 200% provision and 17 have 100%, as they have no rights to the extra provision.

Even so, the grand total of 47 + 132 is 179, not 189. It seems as though the developer double-counted the visitor spaces, and also included the 4 kerbside bays on the access road opposite Block E. There are 12 kerbside bays on Archery Road as well, but they are for drop-off only – see Mr Cocks' letter 4th May 2011:

'Drop-off parking will be permitted in front of the listed terrace, but all dedicated parking will be within the parking court to the rear of the building which is accessed from West Hill Road. With this solution we have been able to maintain a car-free, formal setting for this key building'.

Regrettably, this statement ['all dedicated parking'] is only true as far as it goes – there is dedicated parking, it is off West Hill Road – but there isn't actually enough of it.

Disabled parking

The provision of disabled spaces is also very uneven. There are very few at the top of the site, [3 for 58 dwellings in A and J + B]; but how likely is it that 2/4 of 14 [D], 6 out of 26 [E and F], or even 5 out of 34 [K and M] will need a disabled bay? And where will other residents park if those remain unused? The variant figures are because in the parking court by Block D two pairs of disabled spaces overlap each other, so they could not be used by four people with mobility problems at the same time.

Cycle parking

Several statements, eg in the Interim Travel Plan [4.16, 7.2] and the Transport Assessment Addendum [p6] are made to the effect that cycle storage will be provided in garden sheds for the townhouses and in communal areas for the flats. ITP 7.2 adds 'secure' communal areas, while TAA p.6 says 'within garages or cycle sheds for townhouses'. TAA also adds 'This is in line with the East Sussex Parking Standards'

The SPG for East Sussex: Parking Standards at Development states:-

- 6.1 Cycle standards are a minimum unaffected by zones.
- 6.2. "Sheffield" stands are satisfactory for short-term cycle parking, whereas long-term parking requires secure, covered lockers.
- Appendix A: C3 Residential: Minimum cycle parking standards:
1 long term space per unit if no garage or shed provided.

The situation as detailed, utilising spaces in the undercroft of A and B that the draughtsman forgot to put cycles into is:-

Block A; 14 spaces [8 on the 'second' – entrance - floor, 6 on the lower 'first' floor]
Block B; 26 spaces [6 on the 'second' floor, 19 on the 'first' floor]

This totals only 40 spaces for 46 flats; also, ESSC standards make it clear that storage must be secure. Firstly, many of the spaces are ranged around the walls of the garage at the back of the parking bays, where they are at risk of being hit during manoeuvres; secondly, to say that the garage is fob-key entry only provides no security for an easily

stolen or vandalised item like a bicycle when upwards of 100 people may legitimately hold keys

Blocks C, F, G, H and L; there are no indications on the site layout or the landscape proposals of any garden sheds/cycle stores for these houses. The suggestion [above] in the Transport Assessment that garages may be considered adequate to fulfil the standard requirement must be questioned, as it impinges on the stated provision of car parking.

Block D: secure store in base of block; 5 spaces shown [15 apartments]

Block E: secure store in base of block; 5 spaces shown [20 apartments]

Block F: Shed in yard behind with the bins;? 4 spaces [6 apartments]

Block J: Shed across the front entrance porch; '6no.' marked [12 apartments]

Block K: Secure store in base of building; '32 cycles' marked [27 apartments]

Block M; Shed on access road, by the bins; '8no.'marked [7 apartments]

Even if D and E's stores hold double the number, they are still underprovided for, as is Block J.

The scheme does not meet the requirements of the East Sussex SPG on cycle parking.

Pedestrians

The Interim Travel Plan [March 2011] states on p4-8:

4.14 Pedestrians

The area surrounding the site has pavements on both sides of the road.

This patently untrue; around half of the site boundary has no pavement, from just north of Crabtree House, to the eastern entrance to the Archery Ground. The roads are notoriously narrow, and to add to the danger, the proposals steal several metres of pavement opposite Crabtree House and subsume them into Block J's curtilage.

4.19 Site Permeability for Pedestrians and Cyclists

The site is highly permeable for residents and visitors...As part of the application, the southern section of Archery road is being reopened, which will assist with pedestrian and cyclist movement.

The reopening of Archery Road makes no difference to pedestrians and cyclists from when the College was open, as it was always possible to use the roadway for these purposes.

It is untrue to say the rest of the site is 'highly permeable'. There is no connection whatsoever with the upper part of the site from Archery Road east, and only access roadways to specific locations within the site from Archery Road west.

An ideal place to make a footpath through to Archery Road, to connect the development with the existing community and make life easier for residents of the scheme, would have been in the gap between Blocks C and B, which would connect with the lower arm of The Mount and generate some fluidity of movement in a highly static site. It should not have been beyond someone's wit and imagination to scoop a small section of verge to make a safe exit point on Archery Road. It would not have been possible to make it DDA compliant, but it would have helped the majority of residents.

As it stands, if residents of Blocks F and C wanted to catch a bus from St John's, Pevensey Road, which is supposedly 5 minutes walk away, either they would have to climb the ziggurat by Block B and then slog up the slope by Block J, or walk down to the bottom of the site.

If the resident were mobility impaired, the only exit available to them from the central part of the site would be the access road by Block E, leaving them with the whole of Archery Road west to climb, complete with its dangerous lack of pavement.

4] The development as a whole fails to deliver the high quality of design required

1. The Landscape Design Statement

The tree planting proposals are not of the imaginative quality this site demands. Having lost 19 species in the denuding of the area, it would be only right to replace with a wider spectrum than is proposed. Only three species would be replaced like for like - 2 Whitebeam, 1 Wild cherry and 3 Ash trees are marked for removal; to be replaced with 40 Whitebeam, 14 Wild Cherry and 16 Ash. The one remaining Lime, 4 other Limes having been removed, would be augmented with 16 *Tilia cordata* 'Greenspire', a clone designed to be regular and uniform. The sheer weight of numbers would upset the diversity that characterises the area; there are no replacements for the Austrian Pine or Scots Pine, the Cedar, Elm, Plane, or Sea Buckthorn. There was to be at least one Oak, but it has been removed in the latest revision, as has the Tulip tree, a tree, like the Oak, that could be guaranteed to grow to a great height.

The plantsmen's catalogue descriptions show how far this planting would be from the rural, naturalistic effect that would be suitable for this site:-

Acer campestre 'Streetwise' - 'a tidier form of the Field Maple, more upright shape, suitable for roadside planting'

Fraxinus excelsior 'Westhof's Glorie' - 'a more refined form of the Common Ash, a more uniform habit than the species, often used to form avenues and infrastructure planting, car parks etc.'

Malus Yunnanensis Veitchii - 'a first rate street tree',

Prunus avium 'Plena' 'would form a great flowering avenue'

Prunus padus 'Albertii' 'an upright form of the native Bird Cherry, ideal for street planting'

Sorbus aria 'Majestica' ('Decaisneana) - 'Whitebeam' - 'an excellent street tree'

Tilia cordata Greenspire - 'a very uniform tree'

Carpinus betulus - Common Hornbeam [changed from the original choice, *Carpinus betulus* fastigiata, which has an upright habit] and *Betula pubescens* - Common White Birch - would be welcome, but there are only two Hornbeams, on the edge of the Central space outside Block E, and three Birches, down in the corner below Block J. The Birches are joined by three Crab Apples, and three more are destined for the 'landscaped' triangle between the houses of Block G - which would have been an ideal location for a group of larger trees in similar vein to the ones scheduled to be removed, such as a couple of Scots Pine, Austrian Pine, or Sea Buckthorn.

The eastern rim groups of alternately planted Maples and Ashes, replacing Holm Oaks, Sycamores, a Sweet Chestnut and a London Plane, would change the character of Archery Road east both by the choice of trees and by making a much denser screen along its edge. At present, there is some interaction between users of Archery Road and the interior of the site. This screen would effectively isolate the site and prevent

any visual or aesthetic interaction between it and the surrounding Conservation Area; the only sightline would be at the back of the parking court adjacent to Block D.

Obviously there is a need to supply hardy, tolerant trees that would not need to be replaced, and the whole estate is so regimented that it imposes constraints on planting possibilities, but these landscape proposals embrace the toytown philosophy unnecessarily wholeheartedly. If nothing else, this is shown by the inclusion in the shrub list of *Phormium tenax*, New Zealand native shrub that can be seen in every shopping mall and Council Park.

2. Overall Design

The amendments made since September 2009 have been essentially cosmetic. The design of the individual houses has improved, but the endemic problems persist, because the developer is trying to squeeze a quart into a pint pot. No-one questions the need for housing in St Leonards, nor the development of this site for housing, nor the fact that higher densities can work in some locations; but in boosting the number of units to the current levels, the developer is not able to provide the sustainable and aesthetically pleasing proposal this site demands.

The Local Development Framework of May 2008 anticipated 'over 100 dwellings' at 'the Hastings College site' [PA9]. This is very different from the 163 now proposed on the Archery Road site alone. The 2008 Framework was intended to achieve a more even mix of housing tenure in Central St Leonards, to encourage the provision of larger dwellings (3 or more bedrooms) and [also] innovative housing schemes that might help to change the perception of the town, particularly in Central St Leonards [PA20]. Affordable homes were to be well integrated within the development scheme and indistinguishable from those homes for outright sale in terms of style, location and build quality. 'Pepperpotting' or small clusters of affordable housing rather than blocks of a single tenure was to be required [PA25].

PA's 38 and 39 sought to avoid damage to locally important wildlife and geological sites and wherever possible to protect and enhance the Borough's landscape including the distinctive landscape setting of the town, particularly the structure of gills, woodlands and open spaces. PA 44 called for a strategic policy that promotes safe, 'Secure By Design', and community safety features and encourages equality of access to developments for the whole community. Finally, Shaping Hastings Feb 2010 Critical Success Factor for Objective 12 was that all major housing developments (10 or more dwellings) were to be appraised against Council for Architecture and The Built Environment guidance.

Holding this proposal up against this check list, it does not fare well. Some amendments have made attempts to meet with design criteria, by improving front entrances, for instance, particularly Block F with the relocation of the front door onto the central square. However, that block remains the most cramped of the whole development, with 2 bed 4 person flats more than 10m² smaller than the affordable flats in Block J, which themselves are not much above the lowest edge of acceptability for a housing association. It does seem pointless to be building such small flats when St Leonards is awash with tiny flats, many in roads and streets that are more pleasant and more convenient than these would be.

In a town with a crying need for good quality affordable homes, the allocation split with St Saviours has resulted in only 13% of the offer on Archery Road being for affordable homes, none of them family houses or shared ownership. These flats are not pepper-potted, but grouped [Block J, 12 flats and part of Block B, 9 flats] at the northern edge

of the site, against guidance that no more than 6 units should be placed together. Block J is isolated on the perimeter by the access road to Blocks A and B while the Block B residents would not have the same access to their building as that enjoyed by the private residents; both of these factors are against tenure-blind policies.

The preponderance of smaller units [1 and 2 beds] across the whole development means that it would never be a sustainable, aspirational residential location. St Leonards needs young working couples, who want to put down roots and become part of a community. As couples started their families, they would have to move elsewhere to have enough space for growing children. The flat sizes have been adjusted in some cases, but almost all are designed with a one-room kitchen, diner, and living room. This is a pleasant arrangement when there are other rooms for quiet study, work or entertaining, but as the only living space for parents and children, it has many drawbacks. Those who could move on would; those who couldn't would suffer in increasingly overcrowded accommodation, with all the implications that brings.

In the attempt to cram so many dwellings into an environmentally sensitive site, not only would the topography be literally degraded, but there have been many issues over the disturbance caused to the flora and fauna; the attempts to protect biodiversity have had adverse effects on the quality of the environment offered to residents. Tree root and badger protection have meant that Block A has had to be moved, bringing it closer to both Highland Gardens and to Block B, reducing the amenity space between the blocks. Block J has had to be moved for the same reason, now making it impossible to reach the front entrance from the allocated parking under Block A without climbing a flight of steps.

There are a number of flats that face north or back onto the wooded perimeter, or both; in time the retained trees and/or the replacement screen would become increasingly dense. The locations of Block A, at the top of the site, and Block D at the eastern edge are in danger of failing to meet the requirement of DG3: 'The design and layout of new development should ensure that there is adequate natural light for the new buildings'. In addition, the sustainability of the woodland in the face of residents' concerns about daylight to their homes must be considered.

It is also the case that, since the woodland belt at the top of the site is to be accessible, and the Council's current policy is to encourage children to play in less formal environments than those provided by equipped playgrounds, the retained area and its wildlife would suffer increasing attrition; this would have a further negative impact on sustainability.

3. Safety and security

In considering the overall design values of the site, the question might be asked - 'How true is this Landscape Design Statement [p3]?'

'Spaces within the public realm are designed to respond to the architecture and promote the feeling of safety and security. They seek to address the needs of the whole community, including the disabled and elderly'.

and

LDS p5 'The designed components of the residential realm will provide an appropriate level of lighting and contribute to the feeling of security by minimising the potential for concealment'.

There is no evidence of any provision for a considered scheme of street lighting included in this application. In any case, unless the whole site were to be bathed in a neon glow, there is plenty of 'potential for concealment'.

The accessible woodland belt means that there is secluded access all round Block A, including to the underside of the boarded terrace to Flats A1 and 2, and to the shuttered carpark windows.

In the case of the back alley behind Block C, the close-board fences meet with security guidelines, but as mentioned earlier the alley itself would remain unsecured; of more concern is the ungated paved alley between Block F and the base of Block H's gardens. This runs into the gap between the houses and flats of Block F; partly under a roof canopy which as yet is totally un-detailed on any plan or elevation, this area is largely unsupervisable. With a handkerchief of grass, right by the bins and the one apple tree on the whole estate, it would be an ideal lurking spot.

There is little evidence of passive surveillance design; the southern access road runs past Block B and the bedroom windows of Block E, the undercroft carpark is barely overlooked by Block M's peculiar kitchen windows, while the bank below Block J and Block B is overlooked by two living rooms in block B and some bedrooms in Block J. Even the centrepiece 'Spanish Steps' descend past largely sightless walls.

LDS p7 'Within the central space the rows of conservation setts and hedging are used to bind the private gardens to the edge of the space, therefore helping the space to read as a single entity'...'Larger trees will be used in the centre of the space grading down to smaller species in the front gardens. Formal hedging is used to created boundaries between individual properties and pull the private gardens into the central courtyard'

Quite apart from the linguistic sleight of hand in calling a patch of tarmac a garden, many people prefer to have their own property clearly demarcated, not bound to the public space, pulled into an ocean of paving, to read as a single entity with a car park. It does not engender a feeling of safety to have no boundaries, or a sense of ownership to be blended seamlessly into an amenity space. Would there be covenants to prevent owners from putting up their own fences and walls to establish their privacy?

These elements impact seriously on the sustainability of the site as a desirable location for residents.

4. Mobility and visually impaired and the elderly

There are two benches in the elliptical amenity space in front of the listed building but no benches are provided at the top of the flight of steps on the central axis. Across the Great Steppe of the Central Amenity Space there are no seats, no garden walls to rest on. There are no kerbs to help the visually impaired or children to cross safely; the proposed colour banded paving materials to 'guide visitors and residents through the site' [LDSp3] are of limited use to the visually impaired. At the top of the site there are no handrails for the steps up the sides of Block B.

For the mobility impaired, there is no disability hoist to the carpark at the back of Block K, so anyone using and wanting to park a Motability car would be unable to live in Block K - unless of course they wanted to use the bin hoist that has been put in with the latest amendments. Block B does have a disability hoist for residents of the affordable housing section, but since the only approach to the flats from the outside, if a resident were not driving, is up or down one or another flight of steps, mothers with pushchairs and shopping would almost certainly use it, possibly giving rise to friction among residents.

Block J residents would have no vehicular access to their front entrance and as previously mentioned, could only access their homes from their parking spaces via a flight of steps; the less mobile would have problems, as would those who returned from the supermarket in a taxi – where would it park for them to unload? Block K residents would have the same problem with access from the West Hill Road parking lot, although they at least would be 'permitted' to drop-off at the front doors.

Conclusion

From the first, the Council has required a design of the highest quality, and it might have been hoped that 16 or more criteria [the Gold standard] might have been met of the 20 defined by the Building for Life partners, where 14 criteria achieved represents the minimum acceptable quality of development for housing and neighbourhoods. It is dubious whether this scheme merits an unequivocal 'yes' to even the minimum 14.

Mr Cocks [Letter 4th May 2011] considers that his solution to the need to 'respond' to Archery Villas is a pair of dual-fronted crescent shaped buildings, but in fact they are dual-backed. Their 'front' doors open onto the access road and utilitarian parking square and share a façade with bedroom windows; their 'front' gardens operate as back gardens, opening from the living rooms; there are no welcoming front doors to make an active street front and sense of community with Archery Villas.

In fact, the proposals do not respond well in general to the surrounding community, choosing rather to look inwards, so that it resembles a gated development without the gates. Despite its insularity, the development has no sense of place of its own, being rather a collection of apartment blocks and housing that might be seen anywhere. There is no fluidity between elements so that although they share some design features, buildings fail to relate spatially to each other. There are no streets, only access roads; the family houses on established roads do not enter into a relationship with existing buildings by their built forms or building lines.

Mr Cocks misconstrues [ibid] the concerns of the STAG group. By using the dirtiest word in the architects' lexicon, 'pastiche', he belittles the very real and intelligent objections of a disparate group of people, many of them trained artists and designers but many also just ordinary residents of St Leonards and beyond, who want to see good design, of any origin, that honours the concepts and vision of the original founders of St Leonards.

This is a premier site and demands a premier response. Difficult topography notwithstanding, the lack of aesthetic understanding and the desire to maximise the number of dwelling units has resulted in a proposal that fails on many fronts. Aesthetically, it doesn't work; practically, it doesn't fit.