

Mel Southwell

From: Collette Hall
Sent: 19 September 2017 11:25
To: Planning
Cc: Bob Pedlar
Subject: 63167 Lee Bay Hotel

My original consultation response to this application was made on 26.7.17, but was withdrawn pending clarification by the applicant of figures contained within the Planning and Regeneration Statement. The applicant also amended some design details of the scheme. The response below is my updated response and relates to the amended plans and Planning and Regeneration Statement sent to NDC on 11th August 2017.

This application, for the demolition of the Lee Bay Hotel and the erection of 23 dwellings, café and wc block, associated car parks and landscaping is the second recent application for the redevelopment of this site. The earlier application, 59766 for the erection of 20 dwellings, café and wc block, car parks and landscaping, was refused permission in November 2016. The first reason for refusal related to the impact on heritage assets, specifically: less than substantial harm in relation to the impact on the character and appearance of the Conservation Area, and the setting of the grade II listed Old Mill adjacent, and the loss of significance of a non-designated heritage asset (the Hotel). The public benefits of the scheme were not considered sufficient to outweigh the identified harm. My consultation response to that application should be read in conjunction with the comments below:

The current scheme is a revision of the previous scheme, and does appear to have taken on board several of the points which caused concern in relation to heritage issues. For example, the overall heights have been reduced, and the appearance of the middle block has been altered to remove the row of staggered gable ends facing the street. More local materials have been introduced, and the landscaping of the public area at the west end of the site has been softened. All of these revisions are welcomed, but do not allay concerns about the impact on heritage assets. In summary these are:

- The loss of the non-designated heritage asset, the core of the Hotel, still remains a fact of the proposal.
- The effect on the setting of the grade II listed Old Mill adjacent. The footprint of the Apartment building has been moved further away from the listed building than the existing Hotel, which is welcomed. The treatment of the western end of the arrival building is, however, not as successful in complementing the local vernacular as the existing hotel building, in my view, and therefore a degree of less than substantial harm to the significance of the listed building arising from the contribution made by its setting can be identified.
- The effect on the character and appearance of the Conservation Area. As stated previously, the Hotel is in a poor condition and there is scope, through the redevelopment of the site (whether this involves retaining the existing building or not) either to preserve or enhance the character of this part of the Conservation Area. The question, relating to paragraph 134 of the NPPF, is whether the proposed development achieves this, or whether it causes a degree of less than substantial harm to the significance of the Conservation Area.

To elaborate on the last point:

The established character of Lee is of a dispersed settlement, with individual buildings set in generally large plots, with open spaces between. The sizes and styles of the historic buildings vary greatly from modest cottages to small country houses. The Lee Bay Hotel as existing is by far the largest building within the Conservation Area, and as such its bulk, when viewed from surrounding areas, does not fit well with the overall character of the historic surroundings. This element of discord is mitigated to a degree by the architectural interest of the historic element of the building, and the positive contribution that this aspect makes, despite its dilapidated condition, to the character of the street scene. Given the low intensity of development within the Conservation Area, and the size of the existing building, it is not difficult to see that any proposals which involve an increase in built form and associated hard surfacing are unlikely to maintain the character of this particular locality.

The revised Planning and Regeneration Statement, in paragraph 3.3, sets out a comparison between the footprints, floor-space and volume of the existing hotel and the residential proposal. It shows that the residential proposal is slightly smaller on all counts than the existing Hotel. This is noted, however, the comparison does not appear to take account of the increased areas of car parking that are needed, or the increase in perceived level of development over the site arising from the splitting of the accommodation into three separate blocks, and the provision of the café and car park to the south. These elements are likely to combine to form an increase in development over the whole site.

Turning to the overall design, in my view the proposals for the upper building are the most successful in complementing the overall character and appearance of the Conservation Area. I would suggest that the pitch on the dormer and porch roofs should match that of the main roof and that the central inset row of three glazed doors and balcony on the upper floor of the south-west elevation should be reduced in size so that it is smaller than the doors on the floor below (does not appear to have been addressed in latest amendments). This comment is made, however, on the basis that the building is sunk down into the site, and the landscaping on the northern boundary is strong and viable, given the amount of windows that are likely to face onto trees and the earth bank. The Landscape and Countryside Officer will no doubt give a view on this.

In my view the middle building is less successful; the south west elevation, which will be prominent in views across the valley, has large amounts of glass with no legible hierarchy of proportions, large glazed doors inset into the roof, and an asymmetrically glazed gable on the western end, all of which do not fit well with the more traditional character of surrounding buildings. The north east elevation is more standardised, following the recent amendments, and has the look of a terrace of houses. The south east elevation now incorporates a large flat roofed area with a railing around it on the second floor, which I think is less successful than the earlier version.

The apartment building has incorporated some traditional details such as the fish scale slate hanging, to advantage, but this is offset by elements which are less harmonious with the surroundings, such as the glazing patterns on the south elevation which appear random with no legible hierarchy of proportions. The north elevation remains unchanged, and resembles a row of terraced houses fronting a pavement. As highlighted in the last application, this is an urban form of development which does not have a precedent in Lee, and is not appropriate to the character of the Conservation Area. The western quarter of the apartment building, perhaps because the ground level drops abruptly so that the full three storeys are evident on the road side, appears somewhat disjointed from the rest of the building, which at two storeys on the roadside and east elevation at least, appears to have a more domestic scale. The large windows and glazed doors on the west elevation together with the large areas of balcony and terrace on the upper storeys do tie in with the south elevation, but as per the comments on the above, not necessarily with the surrounding Conservation Area, nor do they maintain the qualities of the setting of the adjacent listed building.

The design for the public area to the west of the site has changed, and again our Landscape and Countryside Officer will no doubt give a view on the suitability of the scheme. I am assuming that more detailed plans of the walls, seats and surface materials will be provided for this area. This area does offer an opportunity to reflect the local vernacular, so if stone walls and paving are to be used, it would make sense to reflect locally distinctive patterns and materials here.

In summary my view in relation to the effect on the Conservation Area is that the proposal will result in less than substantial harm to the significance of this heritage asset. As detailed above I consider that the proposal will not preserve the setting of the listed building, leading to a degree of less than substantial harm in this respect. The proposal will also result in the total loss of a non designated heritage asset. Therefore, under the terms of the NPPF, a balanced judgement which takes into account the scale of harm, the significance of the assets affected, and the public benefits of this proposal will need to be made.

Collette Hall
15.9.17

Mel Southwell

From: Collette Hall
Sent: 12 June 2018 11:57
To: Planning
Cc: Bob Pedlar
Subject: 63167 Lee Bay Hotel

This application proposes the demolition of the existing Lee Bay Hotel, and the erection of 23 dwellings, formation of new public open space, extension to existing car park, erection of café and WC block, and associated highway and landscaping works. It was received by the LPA in May 2017, following the refusal, in November 2016, of application 59766 for demolition of the hotel and erection of 20 dwellings.

I have already made comments on the current application in my email of 19.9.17. To my knowledge, the plans and elevations for the buildings have not changed, so my previous comments relating to those elements still hold. To summarise, I identified that the scheme would cause harm to the significance of heritage assets on three counts: the loss of the core of the Hotel, which is a non-designated heritage asset; the effect on the setting of the grade II listed Mill House adjacent; and the net effect on the Conservation Area. In relation to the latter, although I acknowledge that there are some benefits bought by the scheme, my conclusion was that on balance it does not preserve or enhance the character or appearance of the Conservation Area.

The current consultation relates to various documents submitted by the applicant in relation to the viability of the scheme. These documents have been scrutinised by various consultees, among them Historic England, who made a response on 23.4.18. In general I do agree with the comments made in their letter. Page 3 of the letter includes the following:

“A summary of the Alder King Report has been provided. The full report has been submitted to the council on a confidential basis. It is the Local Planning Authorities responsibility as part of their assessment of the proposals to robustly interrogate the viability assessment provided by the developer.... Through that robust analysis it will establish whether there is sufficient justification for the harm caused to the heritage asset and whether the quantum of development proposed is the minimum necessary to secure the regeneration of the site (Para 132 NPPF). It will also need to demonstrably outweigh the harm caused to the conservation area as identified under Para 134 NPPF, which includes securing the assets optimum viable use as well as associated public benefits. ...”

The LPA has accordingly sought an independent review of the viability of the scheme, undertaken by Plymouth City Council. That review considers the various costs and benefits of the scheme. The review considers the current scheme for 23 units, and on page 5 concludes that this is “comfortably viable”. The review also considers a reduced scheme for 18 units and states “the results from our appraisal indicate that this reduced number of units will also be viable and return an industry acceptable profit level”.

From the above, it is apparent that the proposed scheme for 23 units is not the “*minimum necessary to secure the regeneration of the site*” to repeat the words from Historic England. It appears that this could be achieved with a reduced scheme of 18 units. Therefore, in my view, the level of harm which will arise from the current proposal is not justified.

Given that the density of the proposed development and the levels of ancillary structure needed, particularly parking areas, are one of the factors that are judged to cause harm to the significance of the heritage assets, it would seem obvious that a reduced scheme could potentially cause less harm, and therefore be more acceptable in heritage terms. If this is considered I would suggest that the opportunity to retain and convert the historic core of the hotel (again referred to in both responses from Historic England and myself) is investigated, and that if any units are to be removed from the scheme, the central block and associated parking would be the better candidates.

The Lee Conservation Area Character Appraisal has been adopted whilst this application has been open, and does contain a section on the Lee Bay Hotel (Paragraphs 9.4 to 9.10). Any amended application should take the advice contained in these paragraphs on board.

Collette Hall
12.6.18