

Tel: (01424) 787000 (Customer Services)

Your ref:

Our ref: RR/2017/382/P

Please ask for: Mr M Cathcart

Direct dial no:

Date: 20 June 2017



Dr A Leonard
Executive Director of Business Operations

Town Hall
Bexhill-on-Sea
TN39 3JX

Hodson's Mill Limited
Attn: Mr Max Meyer
Ockham House
Hurst Green
EAST SUSSEX
TN19 7QE

Dear Sir

Application no: RR/2017/382/P
Address & Description: Hodson's Mill, Northbridge Street, Salehurst/Robertsbridge
Erection of 98 no. residential dwellings (Use Class C3), non-residential floorspace comprising 280 sq. m (Use Class A3) and 920 sq. m (Use Class B1), and associated access, car/cycle parking, open amenity space, strategic landscaping and green infrastructure and including restoration works to the Mill Building and Oast House.

I refer to the above mentioned application which is presently outstanding. The Council has carried out consultations on the application and the present situation with regard to this is:

- East Sussex County Council: the position of the Lead Local Flood Authority (LLFA) is that an objection has been raised due to insufficient information with the application. The LLFA's comments dated 27 April 2017 can be viewed on the website. I would be grateful if you would confirm whether you will be providing the information requested.
- East Sussex County Council - Highway Authority: a response is awaited.
- Environment Agency: a response is still awaited. As you are aware the EA has requested an extension of time for commenting on the application.

In addition, the Council has previously approached you regarding the need for an independent assessment of the viability report submitted with the application, particularly in respect of concerns raised about the complete lack of any affordable housing provision and the quantum of business floor-space proposed, which falls significantly short of the potential to provide up to 2,000 sq. m set out in our previous pre-application letter. You have agreed to meet the cost of the District Valuation Service carrying this out and the Council has instructed the DVS in this regard.

The outstanding issues outlined above are fundamental to the development under



consideration and it is the case that responses when received, such as the views of the Environment Agency relating to development in the flood plain, may result in a need for significant amendments in respect of matters such as layout and the residential/business mix. The Council would wish to be in a position to have received and fully considered the responses from the outstanding consultees summarised above before reporting the application to the Planning Committee for determination.

Notwithstanding these outstanding matters which will require your attention in due course, we have carried out an initial appraisal of the scheme in respect of matters of design (including the layout, scale, appearance of the development, impact on landscape character and the landscaping proposals). This letter deals with a number of these issues. We would wish to raise these with you now in order that you may give them due consideration.

You will recall that we have commented informally on development proposals for this site at the pre-application stage (letters of 15 December 2015, 14 March 2016, 3 June 2016 and 25 November 2016) the comments in this letter should be read in conjunction with the comments contained in those earlier letters which still stand.

General design character, density and volume of development:

As a general point of concern the proposed development, particularly the proposed houses to the north of the main Hodson's Mill building and within The Stray, comprises a cramped and very densely knit form of development, displaying extensive areas of brickwork, not only in terms of the dwellings but also in terms of hard landscaping and public realm features; in this regard, the resultant environment is very urban in character and appearance, and as such, rather more typical of a city than a village, which would be expected to display a visually 'softer' approach to streetscape design. This concern was raised at the pre-application stage and applies also to the application proposal. Similarly the submitted artists' impressions show a highly stylised and architectural approach, a number of the house designs are imaginative but viewed in context would in many regards be rather more suited to bespoke urban in-fill plots rather than a comprehensive village site. The public realm strategy is further urbanised by the somewhat over-engineered approach to street design, with the multiplicity of pavements, the proliferation of lamp-posts (a feature not found elsewhere in Robertsbridge or Northbridge Street), and internal street widths; 'The Stray' being far too wide at 6m, (we'd expect this to be 4.5 or 4.8m maximum) in the interests of creating multifunctional, sociable active streets,

In addition to the above, there are a number of specific design concerns that I would wish to raise with you as follows:

Extension to Hodson's Mill: Retirement flats 44 – 71:

This part of the development is of course subject to flood risk assessment considerations, as are a number of the houses. However, notwithstanding these, it remains the case that from a design point of view it is important that the Hodson's Mill building itself should remain highly legible and the dominant form in the overall composition. The new extension development, however, compromises this by extending its footprint to the east and west of the Hodson's Mill building and displaying a higher ridge and eaves level. The extension element thereby competes with the form of the mill, and the important silhouette of the Hodson's Mill building is consequently considerably less distinct in long views as a result.

House types:

There is no objection in principle to a contemporary approach to house design but in addition to the visually 'hard' appearance that has resulted from the design approach taken

and outlined above, the composition, density and volume of the scheme has led to much of the housing having a very limited external amenity space. In particular, a number of the dwellings are four and five bedroom family houses and yet have very little in the way of outside play areas for children. In many cases, the amenity area is provided by a raised terrace or small, highly enclosed courtyard only. A significant number of those houses with gardens are served by short rear gardens (typically only 7 metres), the land beyond which is typically either steeply sloping and/or has retaining walls – thereby limiting its potential use as an outside amenity area for the future occupiers of the properties. This subject is explored in the Council's draft Development and Site Allocations Plan (DaSA) Policy DHG3 which seeks 'appropriate and proportionate levels of private usable external space' for housing.

The ability to meet the reasonable needs of future occupiers is a concern in respect of a number of houses (see Policy OSS4(i) of the Council's Core Strategy). In addition to the restricted outside amenity areas, the complex design response to the topography of the site, with many split level plots and external flights of steps between car-parking and front/back doors (on-plot and within the public realm) has led to an extensive accessibility issue relating to the outside areas and the houses themselves (house type G for example). This is particularly significant for any disabled users with mobility issues or parents with pushchairs, but would be a generally usability issue for all, with regard to day-to-day practicality, security and quality of life. This raises the question as to whether the construction would satisfy the afore-mentioned policy (as well any need to comply with Part M of the building regulations). In this regard, we believe that the central area of the site, between 'The Stray' and the mill should be redesigned to address these issues.

Other design concerns I would wish to raise at this stage are as follows:

- Units D and E in particular raise design concerns in terms of impact on the streetscape arising from both the bulky and prominent appearance of the two storey gables in oblique views particularly from the west, and from the somewhat 'gap-toothed' elevation presented to the street-scene as a result of the intermittent slender built module (demonstrated on sectional elevation D/D). These units also present a rather bleak aspect to the northern boundary of 24/75. We are also unconvinced that these units make an appropriate response in built form and layout to the setting of the listed oast building, and for all these reasons advise you to rethink the proposed development around units 72-75 and 24-27.
- Drawing number 1228-P-142 Rev B – site sections and elevations N-N: This section shows house type L in The Avenue (units 88-97) to be detrimentally dominant in the landscape in long views from Northbridge Street. The land rises in the location of The Avenue and the drawing shows the resultant visual impact of this northern arm of built development protruding into, and suburbanising the character of, the countryside. The visual prominence of these dwellings (units L) is also a consequence of their height. The design of the units incorporates a higher, raised eaves level (to achieve an extra bedroom in the roof space). We advise that the design be amended here to reduce the prominence of the buildings and present the development in a more low-key way which would mitigate somewhat against the impacts on the AONB.
- Additionally, we continue to have concerns as raised at the pre-application stage about the elevated area to the north, containing approximately units 96, 97, 98, 86 and 87, which falls outside the previously developed brownfield land, being included in the application site. This extends the development site into the countryside with the resultant built form and suburbanising infrastructure of roads and lamp-posts etc. having a detrimental impact.

- We indicated at the pre-application stage that it was considered important that any development preserved the rural character of the woodland footpath that follows the Mill Race; in this regard the rear elevations of the units backing-on to this area (76-87) fail to present a visually 'soft' edge to the development but rather, present a continuous mass of hard brick terracing that would be conspicuous from the footpath, and would have a big vertical visual impact on the character of the riverside, the 'M' units in particular but also the 'K's.
- Also in relation to this, at the pre-application stage the importance of achieving a sensitive boundary treatment was raised and it was specifically pointed-out that the impact of any fencing defining the south-western boundaries to the rear gardens of the new dwellings in The Avenue could seriously diminish the existing rural character of the Mill Race footpath; I have been unable to find details of proposed boundary treatments in the application submission. Indeed the actual extent of the rear boundaries of the proposed residential curtilages in this part of the site is unclear. I would appreciate clarification on both of these matters.

The Hodson's Mill building:

The proposed surface treatment around the main mill building is unclear. The mill elevations and plans appear to indicate decking but the surfacing detail drawing (Hard Works Plan) indicates the use of Staffordshire Engineering Blue Brick. We would be grateful for clarification of this detail.

The 'Wealden Hall House' Office Block:

This will need to be designed to meet Building Regulations Part M1 and as such the lift will need to be installed at the time of construction, not deferred for installation by a tenant as indicated on the drawings. In the event planning permission is granted the satisfactory delivery of the commercial elements of the scheme would be subject to a s106 agreement. Additionally, disabled parking will also need to be provided for this unit.

The Oast:

While we are pleased to note that the car-parking area has been relocated to the north-west of the Oast from its earlier position, we remain disappointed that the opportunity has not been taken, as previously suggested, to create a public realm 'event' here in terms of streetscape design and surrounding building layout. If done successfully this would signify and set-off the oast, before one moved on to the more residential character of The Avenue, rather than the somewhat standard and less inspired 'engineered' solution of the road simply sailing past the oast as proposed.

Summary of key design issues to date

The initial concerns raised by the Council at the pre-application stage regarding the composition, density and volume of the scheme, which has resulted in parts of the layout having a cramped and visually 'hard' character and appearance remain. In addition to this key design issues to date are:

- the extent of development northward;
- the issue of curtilages and boundary treatment;
- the scale and appearance of a number of the housing units;
- the ability of a number of the housing units to meet the reasonable needs of future occupiers in terms of amenity space provision and accessibility;

- the impact of the scale of the flats in relation to the adjacent Hodson's Mill building.

Conclusion

As you will note from the above, we presently have a number of urban design concerns with the scheme as presently submitted. We provide you with these comments at this stage so that you may begin to explore potential design amendments. We appreciate, however, that before progressing amended designs, you may wish to receive EA and ESCC Highways comments, and also provide the LLFA with the additional information they request and receive comments back as a result of that, as all these issues may all impact on the layout and design approach.

Naturally additional issues may become apparent following the advice from the DVS.

I shall forward to you further comments as they become available.

Yours faithfully,



M Cathcart: Development Management – Strategy and Planning.