

22/01051/FUL Development of Independent Support Living Apartments (48no.) (Use Class C2), residential apartments (35no.) (Use Class C3), and housing (10no.) (Use Class C3), including enabling works, associated access, landscaping, infrastructure and all ancillary works. Land North East Of Riverside Park Rivergreen Amble Northumberland

Amble Town Council's response to the above application is as follows:-

Although this straddles two parishes, one part cannot be considered in isolation to the other.

Whilst brownfield sites are expected to be developed, there are still many criteria to be upheld before permission should be granted.

This application should be **refused** at present as it lacks important detailed recent reports regarding flooding, surface water removal and SUDS data, discharge effect on the natural water, ecological and environmental issues, the effect of noise and lighting on the location, the effect on the Heritage Coast and the adjacent A.O.N.B. and Special Designated Areas, Geological Aspects and possible Pollutants to name a few. It should also be **refused** on the grounds of mass, density and the adverse effects on its surroundings.

Whilst Amble Town Council (ATC) are not opposed to some development at this location, this is a central town area. Amble already has planning permission granted for many more residential properties than were originally designated in NCC policies and therefore it does not necessarily mean this location should be solely for residential use. The site could be shared or retained for a much greater all round community wide benefit as has been highlighted before as desirable in NCC planning documents and reports.

Northumberland Estates public consultation was about a 'Lifetime Neighbourhood' scheme. 'Lifetime neighbourhoods' are places designed to be inclusive regardless of age or disability and therefore theoretically individuals, groups or families can remain living in a property from 'cradle to grave.' There is a mix of residents forming a supportive community to enable everyone to remain in their familiar environment no matter how they age or whatever physical, mental or emotional changes may occur. *This can be helped by a facility on site to assist those who cannot remain completely independent.* The associated residences are only 1 or 2 bedrooomed- no family accommodation.

This application states it is for residential apartments and independent supported living accommodation. Supported living offers a high level of support for people for whom a residential home would usually be the only viable alternative. It provides accommodation for a range of people including older people, people with a learning disability, autistic people, people with mental health-related needs, vulnerable young people.

Neither of these definitions are applicable as Northumberland Estates clearly show throughout their documentation that they have designed this as a complex primarily for older people who can remain within this site as they age and perhaps become infirm. [Yet nowhere do they state they will restrict purchase to this type of client]

It therefore follows that any public consultation is flawed from the outset despite their assertion that 'that this has demonstrated that there is significant public support for the development' and should therefore be ignored. However, if the presented report is accepted it must be borne in mind that it represents a very small number of responses from those comfortable with this medium but with no

way of determining how local these responders are. Northumberland Estates have refused to hold a face-to-face exhibition to show these detailed plans and invite open constructive criticism and debate rather than their own very slanted questions.

There is an awareness that Amble lacks smaller size accommodation for an ageing population and this concept of smaller properties and supported living accommodation could be most welcome especially if a percentage was designated for those already in the community, is this amount of apartments in this location and on a flood plain the right accommodation for this category of people? Certainly, three stories high for supported living is far from an ideal prospect.

Any development within the parish should not have an adverse effect upon the character and appearance of its surroundings. The design of this estate does not reflect the character of the conservation area which it adjoins. The design does not reflect the open fronted aspect of the conservation area properties and whilst the streetscape elevation gives an impression of the conservation area roof-line considered in relation to the three storey block, there is little leeway should ground levels be raised.

Documentation also states that the visual effect on residents to the South and West will be **substantial** and **significant**. Yet this appears to have been ignored when considering the final site layout; further consideration should be given to a reduction in the height of the supported living block or a re-orientation of it to minimise this acknowledged effect.

The extremely small number of affordable properties here does very little to help Amble Town, these should be increased to a minimum percentage of all the residences including the supported living as these are still independent apartments.

The design and location of the properties would appear to lend themselves to those in higher income brackets or those looking for second homes or holiday lets. To allay these fears, Northumberland Estates should be encouraged to accept a main residence condition for all the properties.

If the development's purpose is to focus on the ageing population, then it is perverse to suggest less car parking is required. Whilst it is hoped that healthy lifestyles will begin to influence people to walk or cycle more, it is highly likely that each of these properties will have access to a vehicle and therefore more car parking is needed. The open aspect of the parking will also lend itself to abuse by the general public whether intentional or not and whilst it is important that adequate numbers of spaces are incorporated, some means of restricted access should be imposed.

It is acknowledged that North Street will have significant pedestrian improvements made to it which will be beneficial to walkers and cyclists alike. However, whilst the open plan aspect of the scheme and car parking may seem desirable, it can also lend itself to unwanted anti-social behaviour. The footpaths may be extensively used by those accessing part of the Braid and also forming a shortcut to the A1068 river walk, and so there will be little privacy and security for residents. The mostly open grass land with shrub screening does 'tidy up' the brownfield site, but the proposed stepping stones, willow arbours etc. also lends itself to anti-social behaviour unless these are well lit and maintained. All the landscaping including the pond, seating etc. requires a resident's maintenance scheme to ensure it is kept to a high standard as its open aspect makes it very visible to general public view.

Consideration should be given to implementing methods of greater energy efficiency such as better insulation, quality house furniture, solar panels, water harvesting, permeable materials for driveways, charging points for electric vehicles.

A new noise level assessment is needed as the recordings carried out in mid-November when the surrounding 'businesses' are in a state of lull is not giving a true reflection. The Bowling Club would then have been in its winter recess, the yachting and boating fraternity would be less active and fewer residents would be utilising Queen Street facilities including take-aways and people partaking in outdoor drinking! Also, the noise level from the development can only be fully assessed when it is definitely confirmed that no external plant will be installed. It is respectfully suggested that a noise level impact study is also required for the effect of construction upon the adjacent residential properties.

Before any work is undertaken there must be detailed contamination studies carried out and all mitigation elements strictly implemented and adhered to. The area was previously a builder's yard and surveys conducted there show that some trenches were not completed due to the discovery of modern materials. It is entirely possible that asbestos waste is on this site and it is acknowledged that disturbance of this can be extremely harmful and the effects long lasting. There must be a detailed method statement to show how any type of contaminants will be made safe/removed or controlled.

Part of the development area is on a flood plain and building on such an area is often discouraged. The density should be adjusted downwards to alleviate some of the possible concerns associated with older occupiers residing on a potential flood plain. The proposed remedial measures will only serve to raise the heights and create an even greater impact on the surrounding areas and those properties in closer proximity who will be even more overshadowed and overlooked with the subsequent lack of privacy and enjoyment of their own environment. These remedial methods will result in lots of ground earth movement and it will mean the leading in of vast volumes of materials with the ensuing noise and dust involved in these movements. The Development Site Enabling Works state HGV movement of 3 return journeys per hour of each 8 hour working day; that is 24 trips per day for 2 months or more or 1 every ten minutes! This is between 15-20 metres from homes. There will be a severe detrimental effect on adjacent residents' mental and physical well-being and enjoyment of their environment for some considerable time. The actual construction phase is expected to then take a further two years where again there will be many journeys for the required materials. All this will also have a massive impact on those using the Braid area for quiet recreation.

What will happen to the current retaining walls which are not in a good state of repair? Will there be mitigation for the effect upon the line of the Guilder's Burn and its flow to the outlet? In the past there have been considerable problems of flooding associated with this outlet which is currently already being expected to take extra capacity from new build properties to the west of the town. How will the effect of even more input be handled to ease the risk of flooding not only for these properties but also those at Riverside Park and possibly Rivergreen?

Lighting of the site needs to be carefully considered in relation to resident's well-being but also in some areas considering animal habitats.

If permitted, substantial S106 contributions are needed particularly in relation to Health, and Recreation and Leisure Facilities in Amble parish. If as is indicated by this supported living unit

application, the population will be expanded by an influx of older people, this will put an even greater strain on our existing health centre capacity. Extra recreation and leisure facilities will also be needed to maintain the good health and welfare of the other residents.

Access to this site is extremely difficult and there have been other suggestions brought forward. North Street is too narrow and totally unsuitable for construction traffic especially on a National Cycle route and Right of Way. Behind Belvedere Court but where would a suitable entry/exit be with the narrowness of the streets. Access off High Street behind the Co-op Car Park has been deemed unsuitable particularly due to the terrain at that part of the site.

Riverside Park - similar to the space at Rivergreen with the associated disruption would create a vastly increased volume of traffic onto the A1068 at the bottom of the Wynd which several new properties already feed onto. Although necessitating a complete redesign of the site, this would contain the access road within the development area, alleviate some of the overlooking element to adjacent properties and possibly place those less mobile residents nearer to the shopping area. The private road, being narrower than NCC Highways, would also have a natural speed/traffic calming effect. Placing a roundabout at the connection to the A1068 would ease congestion problems and also limit the rate at which vehicles enter and leave the town due to the reduced speed required to negotiate it. Residents of the whole facility would have immediate access to the already designated bus stops on the A1068.

Yet Northumberland Estates feel they have the solution via Rivergreen.

However, when planning permission (A/2004/0528) was given for this estate a condition was attached:

10. The area allocated for parking on the submitted plan shall be kept clear of obstruction and shall not be used other than for the parking of vehicles in connection with the development hereby permitted. Reason: In the interests of amenity and road safety

This is the very area which they now propose to utilise. At this point there is no room to make greater cycle connectivity which current schemes must incorporate. Using this area may create problems too for any vehicles requiring that space to turn. Equally pre application advice stated that where this exits onto the A1068, trees would need to be cut back to improve inter-visibility. These trees are part of an iconic avenue with preservation orders and an application to remove would be strongly opposed.

Whilst it is stated this road has had no significant accidents or incidents in the last five years, it continues to require speed monitoring by police detection vans and is to have a speed notification sign placed here to try and slow traffic down in both directions. However, the application states that the number of vehicle movements would have '*no discernible impact on the operation of the existing highway*'. This is a ludicrous statement as anyone who has waited to access or egress from this estate or the Braid entrance can testify, especially on a summer's day or weekend. If this was deemed an acceptable entrance some major highway restructuring would be required but again this would affect trees with preservation orders, established copses and community planted daffodils.

An up-to-date comprehensive detailed ecological survey should be conducted to establish the variety of plant, insect, animal and bird life which inhabit or use the area to be disturbed and its close vicinity in order that species are clearly identified and any mitigation conditions are stated and adhered to.

Even if it is then determined there will be little effect, if permitted this access would run alongside the open Braid area and would require at the bare minimum screening and some form of barrier to protect children who regularly run and play here. How will a speed limit be imposed on this route designed as a private road? What traffic calming measures will be included? Will there be lighting along the route? Bearing in mind the safety of support workers who may use it must be balanced alongside the possible harmful effect upon wildlife.

Their suggested temporary access road would result in a high volume of construction traffic on this busy access to the Braid and a parking area used by walkers, those going to the boat and yacht club as well as Shore base and the Camper vans leaving their overnight stops. There is currently no safe pedestrian way at this entrance and this increased volume of traffic will be a major safety hazard to any walker using it. At times there would be a significant impact on the Highway with vehicles queuing to enter and leave. At the very least, for safety reasons, there could need to be a one-way system for entering and exiting the Braid parking area.

Tree 52 - at the proposed new junction for the temporary access, is to be removed; this must be retained as it is a commemorative oak planted to mark the construction of Amble Marina. {Similarly tree 111 at the junction of High Street/Queen Street/Corner of Co-op Car Park also has a preservation order and must be retained}. To retain but still construct this access will instead mean the removal of several trees from the adjacent copses.

Before any work is undertaken on the access route or the temporary access there must be detailed contamination studies carried out and all mitigation elements strictly implemented and adhered to. There must be a detailed method statement to show how any contaminants will be made safe/removed or controlled. There must be continual monitoring during the construction as some of it may be over areas used for landfill where the exact contents are unknown.

If the application's temporary access is permitted then the removal and reconstitution of the land must be a condition attached with a specified time limit e.g. within 3 years of the commencement of the development as if not then it could be there for many years into the future. This is necessary to restore the natural environment as soon as possible for the enjoyment of all.

If permitted, then all usual construction conditions must be attached, particularly working time directives, on site storage and parking facilities, vehicle cleaning conditions; however, in its present form, **Refusal** of this application is urged.

Amble Town Council

10th May 2022