

The Heswall Society

"established for the public benefit to conserve the heritage of the Ward of Heswall"

www.theheswallsociety.org.uk

Registered Charity No. 516421

Miss A McDougall
Regeneration and Planning
Town Hall
Wallasey

27th May 2019

Dear Miss McDougall,

APP/19/00636 | Proposed demolition and erection of a three storey new build residential development containing 23 Flats (4no. 1 bed and 19no. 2 bed). Car Parking located to the rear of the site accessed from both Poll Hill Road and Radnor Avenue. Amenity space is provided to the perimeter and bin & cycle storage is provided adjacent to the car park. | Heswall Gospel Hall Assembly Of Christian Breth, PENSBY ROAD, HESW7L, CH60 7RD

Thank you for consulting The Heswall Society on this application. It has been decided to object for the following reasons:

1 Overdevelopment and location

In our view the proposal would represent a very significant overdevelopment of the site.

SPD2 3.3 states that "the Local Planning Authority will expect major developments of 10 or more flats or schemes with a density above 50 dwellings per hectare, to be located within 400 metres safe walking distance of a Key Town Centre or Traditional Suburban Centre. Proposals in excess of 50 dwellings per hectare beyond 400 metres from the above centres would be unlikely to receive planning permission." This application comprises 23 flats with a density of 115 per Ha; the distance from Heswall (Key Town Centre) is "approximately 500 metres" according to the Design and Access Statement.

SPD2 5.9 states "Adequate landscaped garden space should be provided for the exclusive use of residents. This should be accessible to each flat and have a size, shape and location to be useful to occupiers. As a general guide, developers should ensure that at least one third of the whole site remains available as private landscaped communal areas. Driveways, garages, parking, servicing bin and cycle stores will not be considered to be part of this amenity area." It is our view that the amount of amenity space provided by this application is inadequate.

2 Parking

NPPF (2018) states

Maximum parking standards for residential and non-residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres and other locations that are well served by public transport (in accordance with chapter 11 of this Framework). It is questionable whether the blanket maxima in the Council's SPD4 are applicable. We note that one parking place has been allocated for each flat. I would also refer to para 3.9.2 of the report to the Planning Committee on 30th May re APP/19/00167 1 OLDFIELD DRIVE, HESWALL, CH60 6SS which reads

“ Car Parking

A total of 10 no. off-road parking spaces would be provided for the 5 no. apartments comprising 1 no. three bedroom and 4 no. two bedroom apartments. This complies with the requirement of the Council's SPD4 (Parking Standards) which states that an average of 1.5 spaces for 2 bedroom houses and two spaces for houses with three or more bedrooms. To mitigate any overspill parking issues onto Oldfield Drive and provide sufficient parking for residents and visitors, this requirement has been increased to two spaces per apartment.”

In our view the provision of only one parking space per flat would result in significant on street parking quite close to the junctions with Pensby Road, which could impact safety.

SPD2. 5.36 states that additional provision should be made for disabled people. We are also concerned about access provision for delivery vehicles, maintenance, health visitors etc. The number of cycle spaces would seem inadequate (and the bin space looks too small).

3 Design

SPD2 5.13 states “The main entrance to the building should be located in the front elevation and provide access to individual flats from within the building whenever possible.”

SPD2 5.26 states “The design of the main entrances must be expressed at a scale proportionate to the building as a whole. Large buildings should have grand entrances on the main frontage seen from public vantage points to give identity and balance to the overall scheme.”

These are important guidelines and should be fundamental to the design.

4 Massing and Roofscape.

We are concerned about the monolithic form and scale of the elevations to Poll Hill Road and Pensby Road and the lack of breaking up of the roof form in these elevations. The scale of the buildings and close approach to Poll Hill Road and Radnor Avenue will result in the building dominating these roads. The mass of the development would be excessive and over dominant to many neighbours.

5 Heritage

Although not nationally listed the original hall should be regarded as a heritage asset. It represents an expression of strong local commitment having been built in

1924 by Charles Peers, a local builder and committed Christian. Mr Peers, along with a handful of other Christians, met for worship above a printer's shop on Grange Mount. As numbers began to grow it was clear the room was no longer suitable so Mr Peers began building the Gospel Hall.

Charles Peers was a man with a vision and the Gospel Hall was an important part of that vision. He also had ambitious plans to develop the areas around the centre of Heswall (he built the Castle Buildings on Telegraph Road). The original building comprised the front hall, which stands high above Pensby Road, with a long flight of steps leading up to the impressive entrance and two further entrances from both Poll Hill Road and Radnor Avenue. An extension was added to accommodate a Sunday School and the rear schoolroom was built a number of years later, comprising a main hall, eight classrooms and a smaller hall. The Maranatha Bungalows adjacent to Gospel Hall were built to house Christian missionaries on their return to the UK.

NPPF 2018 states:

184. Heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value⁶¹. These assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations⁶².

189. In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation

190. Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.

192. In determining applications, local planning authorities should take account of:

- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- c) the desirability of new development making a positive contribution to local character and distinctiveness.

193. When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important

the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

197. The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

198. Local planning authorities should not permit the loss of the whole or part of a heritage asset without taking all reasonable steps to ensure the new development will proceed after the loss has occurred.

199. Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible⁶⁴. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.

In our view any proposal for development of this site should preserve the maximum amount of the original hall, especially the front facade and doorway and it should be accompanied by a heritage statement.

6 Conclusion

It is the view of The Heswall Society that this is an important local heritage asset, a 95 year old character building on one of the main gateways to Heswall and the application should be determined in accordance with the 2018 NPPF. The most important structure is the original front hall raised high above Pensby Road with its imposing entrance. We welcome the preservation of the front steps and gateway and would expect the sandstone walling also to be preserved. However, we consider that a redevelopment should preserve the maximum of the original hall especially the front facade / entrance.

Quite apart from the heritage aspects, for the reasons stated in this letter in sections 1, 2, 3 and 4 it is our view that the proposal for this site is a "poor design". The NPPF states:

130. Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions, taking into account any local design standards or style guides in plans or supplementary planning documents. Conversely, where the design of a development accords with clear expectations in plan policies, design should not be used by the decision-maker as a valid reason to object to development. Local planning authorities should also seek to ensure that the quality of approved development is not materially diminished between permission and completion, as a result of changes being made to the permitted scheme (for example through changes to approved details such as the materials used).

127. Planning policies and decisions should ensure that developments:

a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;

b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;

c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);

d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;

e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and

f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

In our view this application is also in conflict with UDP HS4 (i), (ii), (iii), (iv) and (vii). We would ask that this application be refused and that a new and imaginative proposal be developed which incorporates the most important heritage elements and is one which is in keeping with its surroundings.

Yours sincerely,
Dennis Clegg
The Heswall Society.