Exhibition Response

The Remarkable Group

50 Brown Street Manchester

M2 2JT

19.11.2017

**Ref: McCarthy and Stone Retirement Lifestyles Limited Proposed developments - Church Cliff Drive, Filey, Housing allocation HA23 within the SBC Local Plan).**

To whom it may concern,

This is to register our concerns and the community concerns concerning the above mentioned development.

I do not support these proposals.

The following points are for your consideration:

**1. Your plan contravenes official SBC guidelines**

The proposed plan is not consistent with the guidelines set by SBC Conservation Officers in the Housing Land Selection Methodology and Assessment (HLSMA) report. Specifically, Question 13 on Historic Environments states: “*Design considerations should be placed upon proximity to listed Church Cliff Farm” and that* “*for development here not to have adverse effect on the heritage assets it needs to be one of three alternatives.”*

Your plan is a combination of alternatives - Bungalows and a large L shaped 2 storey apartment block. This does not meet the criteria of the HLSMA.

**2. Your plan conflicts with the existing design and outlook of existing properties.**

The Conservation Officer and the Inspector in the planning hearing explicitly stated that any development must be in accord with the existing character of the area. As the overwhelming majority of properties are single storey your proposal for a two storey apartment block is inconsistent with the above requirement.

The proposed location of the two storey complex will undermine the character of the area and will gain a position of prominence that will be to the detriment of existing properties.

The properties on Church Cliff are not two storey, only one structure is of this nature but does not have a prominent position and is located lower down in the complex.

The properties along Church Cliff are single storey, the roof windows are for additional light and do not conform to the definition of another storey.

Your proposals are not sympathetic to the existing structures in the vicinity.

**3. The proposed plan does not conform to the National Planning Policy Framework (NPPF).**

You are not recognising the stipulations of Paragraphs 126 and 129. *“Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by 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 assessment into account when considering the impact of a proposal on a heritage asset, to avoid or minimise conflict between the heritage asset’s conservation and any aspect of the proposal.”*

**4. You are in contravention of the aims of the Local Plan.**

You are referred to the following:

Local Character 5.6 and Detailed Design 5.13: *“Local character and key features within the built environment, such as listed buildings and other heritage assets play a significant role in promoting economic and social prosperity by providing attractive living and working conditions. It is therefore essential that local character is safeguarded.”*

Policy DEC1- Principles of good design. States. *“ii. That the detailed design responds positively to the local context, in terms of its scale, form, height, layout……”*

Policy DEC5- The Historic. “b. *Proposals affecting a conservation area should preserve or enhance its character or appearance especially those elements identified in a conservation appraisal.”*

**5. McCarthy and Stone have already objected to development on this site, and there have been no material changes that would render their previous arguments null and void.**

During the consultation stage of SBC’s Local Plan Stage, the company objected to the inclusion of site HA23, representor number ID 371848. They stated: NO to the legal compliance and soundness. The reasons they gave: NOT justified or consistent with National Policy.

**6. The costs of development on the site will be prohibitive.**

You will obviously undertake a financial viability appraisal. An engineer retained by residents has already made the points that the following will ensure increased costs and prohibit extensive development on the site:

Buffer zone to Country Park / Church Cliff Farm (Conservation Area)

Single Storey Buildings (Conservation officers report Ref: Question 13 in the HLSMA).

Drainage Infrastructure (within the site, Yorkshire Water – 3mtr standoff regulations)

Storm water/Flood water Attenuation, Sustainable Drainage Systems (SuDS)

Community Infrastructure Levy (CIL)

Highways S278

Planning Obligations S106.

Local residents will retain engineering consultants to scrutinise all aspects of the proposed plan.

**7.** **The Strategic Flood Risk Assessment (SFRA) for Northeast Yorkshire States NO development to be in this area. The area is identified as a recognised flood management zone.**

From a risk analysis profile your clients are taking on significant risks with this development. SBC has not been transparent nor forthcoming in the possible ramifications arising from this site. Your clients will certainly incur significant financial costs if it is to comply with the requirements set out above. Moreover, the negative publicity that will inevitably arise when and if the area becomes flooded again will have an adverse effect on their reputational profile.

Throughout this process, SBC members and officers have adopted a highly questionable and unprofessional approach. They have alienated the local community through their incompetence and inability to understand the needs of the community they are supposed to represent. Had they adopted a transparent and thoroughly professional approach in accordance with established policies and guidelines they would not have alienated local residents.

If your client wants to be associated with such strategies/organisations then that is their choice. But when a business ignores key stakeholders there is only one outcome - corporate history, especially in the construction industry, is littered with too many failed enterprises.

For the above reasons, we want to raise our objection to your proposal in its current form.

Regards,