

From: Duncan McLeod
Sent: Monday, July 17, 2023 4:59 PM
To: Samuel Fuller
Cc: Cllr Louis Gardner
Subject: RE: Protocol Letter for PA22/10572 Land at Bristol Hotel

Dear Sam

Five Day Protocol - [PA22/10572](#) | | Full Planning Permission for residential development (Use Class C3), car and cycle parking, landscaping; and all ancillary works including demolition of all existing buildings and structures. | - [Land At Hotel Bristol Narrowcliff Newquay Cornwall TR7 2PQ](#)

Having given consideration to your reasons for recommending **Approval**, Members have now responded by choosing to **Maintain their Objection**.

Members wished to make it clear that positive comments about the current proposals were a reflection of how unhappy they had been with the previous two set of plans. Whilst seen as an improvement over previous designs, the objection to the current set of plans is strong and it is considered there is a long way to go before the Town Council would be able to support this scheme.

Breach of Policy D2 (and G2c and D1a2) The proposed development in its height and bulk is out of character with this important locality.

Serious concerns are expressed at the suggestion that NNP Policies G2c, D1a2 and particularly D2 all of whose bedrock is the Newquay Character Study are "guidance" only and are not part of the Planning Framework.

For blocks 1 and 2, other than the obvious physical height and bulk differences between 4 and 5 storey (with pitched roof) , a major dissimilarity is the latter breaches the Newquay Neighbourhood Plan; whose policies that for Narrowcliff are very clear – an active frontage of 4 stories a 5th floor well set back together with its pitched roofs may be acceptable – though it towers over the Tesco building which provided the measure of acceptable height including that set back 5th floor.

With reference to the Cliff Edge apartments (and its proposed extension). This was decided after some after some detailed debate and redesign and met the NNP policies by maintaining the active 4 story frontage with the 5th floor set back – we can refer to the delegated reports for PA18/09825

and PA22/06056. Possibly the delegated report of PA22/06056 would be of assistance:

Responding to the established front building line, the new application also steps the front elevation / footprint of the building to respect the building line established by the Premier Inn and Cliff edge, creating further visual interest within the streetscene and a new architectural language addressing Narrowcliff. Turning to building scale and mass, the development has been designed to respond the new built form / massing now characterised along Narrowcliff by Cliffedge and the Premier Inn.

Clearly the current proposal with its active frontage of 5 storeys and additional pitched roofs on top of that has the development looming over Tesco's and does not respect the building line established by the Premier Inn and Cliff Edge. (Photo 2 in their Town & Visual Impact Photo,)

Whilst the colour palette is considered suitable, a floor less or the top floor being set back (along with its pitched roof) might be an acceptable design. Not so the two protruding black blocks reminiscent of the canted tower proposed for the Narrowcliff Hotel (PA18/03589) part of this development which the appeal inspector agreed would be a dominant feature in views along Narrowcliff, the westward block appearing particularly dominant over Tolcarne Beach

(Photo 23 in their Town & Visual Impact Photo, though their habit of making the build translucent makes it difficult to judge the effect)

Block 3 – fair to consider that in relationship to Hilgrove Road and set lower as it comes down the hill; the lack of architectural interest is matched by the blocks opposite (but at 5 storeys it will loom over the first houses of Hilgrove Mews). Members noted the Officer appears to agree that the block would have an overbearing relationship the Barrowfields Hotel. Losing the 5th floor with a better design on the ground floor and put affordable housing on the ground floor instead of the storage cabinets would be more acceptable.

Breach of Policy LE4 Views and Vistas. Just be by being so much taller and bulkier than any other block on Narrowcliff – and it is noted that no real visual examples illustrating the visual impact of the scale and mass of the development, as seen from the rear, have been provided.

Breach of Policy HC1: loss of the Hotel Bristol (and its historical contents), undesignated historical assets – Members refer again to the Inspector's decision regarding the Carnmarth Hotel, the loss of this NDHA is more than just "regrettable" but clearly bears some actual weight. The

justification that loss of the Bristol is mitigated by the 'public benefit' delivered by the proposal needs to be revisited as the extent of this 'public benefit' described is highly questionable.

Breach of Policy LE2 (and CI 3) Effect on Barrowfields and Tolcarne Beach, both as Valued Landscape and public open spaces – reducing the visual and recreational amenity

Members are far from convinced that there will not be a negative effect from the wind (everybody is commenting on the possible wind tunnel between buildings and their wind study does not cover Barrowfields (although they do say the only increasing wind is across Narrowcliff!) And certainly not by the comments on shading – reassuring statements not backed up by evidence is not enough, I'd need to see just how much shade is being generated, particularly over the businesses on Tolcarne Beach in the morning hours

Members have also drawn attention to the comments from the Ramblers and the 'Friends of the South West Coastal Path' both of whom raise strong objections; the comment from the latter is considered particularly pertinent:

"It remains the case, however, that virtually the only example of Newquay's early 20th century architectural development adjacent to the SWCP would be lost, to be replaced by development which has no reference to Newquay's history, location or setting, and overwhelming the setting of the archaeologically important neighbouring Barrowfields."

OTHER ISSUES

ECOLOGY – Members noted the comment relating to grey water had not been addressed – it is argued there may be a breach of the Climate Emergency DPD document for water reuse, recycling and rain water harvesting p38 Policy SEC1 – 5.

COASTAL CHANGE - Members were in support of the following comment submitted by the Environment Agency (20th June) *"With reference to the 'Stage One Geo-Environmental and Coastal Stability Assessment' (Report No.13885) provided by the applicant, the coastal stability element is extremely brief, fails to provide sufficient detail for a number of key considerations and some key aspects are omitted altogether."*

PARKING - Concerns exist that there doesn't appear to be any consideration of where the 33 employees are going to park.

PUBLIC BENEFITS - Whilst 33 new jobs (+ support staff) are seen as a benefit, has this total taken account of the number of employees and support staff employed in the Hotel Bristol? The argument loses its strength if not.

HOUSING – Members challenged the notion that the proposals will achieve ‘public benefit’ for the town in terms of delivering housing. Newquay is in no way short of real housing developments, construction and investment. The town is on target to vastly overachieve the housing that was scheduled to be provided by 2030 – and there is a significant shortages of construction workers already affecting approved developments. Like many of the blocks that have been developed along our coast in recent years, this is not a development aimed at providing a solution for Newquay’s housing needs. Newquay is a holiday town and welcomes such developments prospering – but they do not provide “public benefit” as indicated.

AFFORDABLE HOUSING.

This is not primarily an affordable housing led scheme but a major development in a special area with the standard 35% affordable housing requirement. The affordable housing element does not override policy if the development is unsuitable.

The real work done by the Affordable Housing Team and the Planning Officers for the major transformation of the entirely unacceptable previous design for the affordable housing block. The Affordable Housing team comments that the future use of the affordable housing block is not yet settled though their preference is clear. A shame we were not reconsulted though the AH report indicates most of the obvious questions are still outstanding

Concerns persist that a single lift serving 49 flat would be regularly congested, with mechanical faults potentially isolating older residents (who appear to have been put forward as ideal tenants for the type of housing being provided). Whilst the centrally placed lift is better, access to the lift (and to the stairs) on the ground floor is fairly complex, being some distance from the entrance, down an internal corridor past the staff amenities and the waste bins.

We would hope the opportunity would be taken to review this design and consider using the ground floor for level access affordable housing units instead of storage space for Blocks 1 & 2.

If you have any queries, please don't hesitate to get in touch.
Kind regards
Duncan

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