

Berwick upon Tweed, Conservation Area Advisory Group (CAAG)
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For The Attention of the Case Officer, Mr Tony Lowe

Application Ref 17/00718/PREAPP

Date Valid 07/11/17 Location Land North Of The Estuary, Dock Road, Tweedmouth, Northumberland. Description Proposed extra-care housing providing 21 x 1 bed apartments, 18 x 2 bed apartments (39 apartments in total) with communal lounge/dining facility, offices, laundry, assisted bathing suite and car parking.

Every Application should be judged on its own Merits.

The Pre-Application proposal should not be influenced by the previous Heritage Quays development which was given Planning Permission in 2004 - 13 years ago, because -

- Present day Planning Policies guidelines are now more stringent towards development in a sensitive area.

e.g. National Planning Policy Framework, Chapter 12, Paragraph 131 directs local planning authorities to take into account 'the desirability of sustaining or enhancing the significance of heritage assets' in a manner consistent with their conservation and the desirability of new development making a positive contribution to local character and distinctiveness'

- At the time of the previous application there were no Conservation Area, Character Appraisal and Management Strategy Documents, nor NPPF for Berwick, Tweedmouth and Spittal, available for reference.
- At that time English Heritage confirmed that this is a significant site in what is a nationally significant area in terms of the historic environment and they raised the issue of the possible increase in height of the development due to potential flooding.
In addition concern was expressed about the way the proposed buildings would interact with the public space. It is the character of this space which is of particular interest.

Restrictions regarding the site and the initial development

- The site is on the highest-risk Flood Zone 1
- This led to the developer being unable to comply with the prescribed building height Above Ordinance Datum
- The perimeter walls towards the river do not belong to the site and are in a poor state of repair.
- The site is on reclaimed land, made up of pervious gravel and sand, which requires special measures for any construction.

These are still key factors in the consideration of any new proposals.

Therefore the previous proposal called 'Heritage Quays' is a poor reference against which any new development should be compared.

If it were applied for today it is likely that radical changes would be needed.

A brief summary of this area of Tweedmouth (the Old Village Core)

Conservation Areas are essentially about character and appearance derived from many factors, settlement patterns and historic influences. This includes individual buildings, listed or otherwise, building groups, historic patterns of development and the relationship with spaces in and around buildings, as well as landscaping, spaces and views.

There is a notable building line to Dock Road that demarcates public and private space. The plan form is rectangular; the built form small in scale.

To understand the development pattern, you have to understand the topography. The two storey and single storey houses nestle on the lower riverside plane before the land rises quite dramatically to a higher plateau (early development around the church's mound) and elevated arc of the railway embankment.

The resultant form of development that lies on and between the upper and lower level, creates an animated layered scene that is characteristic of Tweedmouth Conservation Area. Views from Tower and Dock Roads are dominated by the river and Berwick.

Likewise, views from Berwick are dominated by the riverside and Tweedmouth's intricately layered buildings, spaces and trees that rise up to the higher ground.

Pre App development 17/00718/PREAPP

The proposed design of this development has made no attempt in terms of massing, height, style and materials to comply and fit in with the present surroundings.

Its presence would be totally incongruous in this particular setting, of mainly small scale buildings.

The bulky 3 storey development on this site will totally dominate the area and will have a negative affect on all 3 Conservation areas.

By siting this building along the river edge the three storeys plus a roof will destroy the 'animated layered scene that is characteristic of Tweedmouth'. Viewed from Berwick and the Walls this layered formation will be obliterated.

Placing a tall building directly opposite small scale housing will create a claustrophobic corridor along Dock Road.

The present proposal is an overdevelopment of such an important riverside site.

These comments pick up the concerns raised by English Heritage, as mentioned above.

In practical terms - is this a suitable site for sheltered housing ?

- the site floods - consequently the lifts may not work.
- It is not a very 'Green development'
- the building will have a lack of light as it predominately faces North/ north east. Those apartments facing the river will need to have the light on during the day
- An essential factor for people in care is warmth - Its position next to the river is a cold windy area, both in summer but especially in winter when conditions can be bitter. Every time the tides turn, the temperature drops as it brings in the cold air from the sea.
- There are only 17 parking spaces for 39 apartments. One acknowledges not all occupants will have a car. But there is a need for parking for ancillary workers, visitors and ambulances. Dock Road is a busy narrow road, already full of parked cars, that often causes congestion. Next to the site is Tweedmouth's Town Green, where it is illegal to park.

Adjacent to the site is a working dock. It can be very noisy, dusty, smelly and with continuous working throughout the night. This brings disturbance by light pollution and noise from movement of vehicles and the operation of the heavy metal covers which clash down onto the hold.

The proposed development is right next to the dock itself and large container ships will pass, only a few metres directly in front of the residents' accommodation, day and night according to the tides. This will result in much disturbance and lost of amenity for any future occupiers.

The continuing existence of the Dock to the economy and the livelihood of the community is of paramount importance and should be protected at all costs as supported the advice contained in the NPPF and the recent policy document 'Berwick upon Tweed, Coastal Community Team, Economic Plan March 2017'.

Should planning permission be granted for this proposal it will bring into question the future economic viability of the docks and prejudice the recently agreed 2million pounds investment in the docks as part of the Berwick regeneration scheme. This is because of pressure from new residents who can legally object to the running of the Docks by reason of noise and disturbance.

This site could be vital to achieving the docks full potential. In this case, perhaps the site should be rejoined to the dockland area.

Margaret Shaw
CAAG Chairman