

Appeal by Churchill Retirement Living Ltd. against non-determination of a full planning application for redevelopment to form 39 retirement living apartments including communal facilities, car parking and associated landscaping

Station Rd, Great Shelford, CB22 5LT

**REBUTTAL PROOF OF EVIDENCE OF ELIZABETH MOON
ON BEHALF OF SOUTH
CAMBRIDGESHIRE DISTRICT COUNCIL**

SOUTH CAMBS DISTRICT COUNCIL REFERENCE: 21/05276/FUL

PLANNING INSPECTORATE REFERENCE: APP/W0530/W/22/3296300

1.0 Introduction

1.1 This rebuttal proof of evidence has been prepared to rebut particular points with a view to saving time at the Inquiry.

1.2 In preparing this rebuttal I have not addressed every point raised in the Proof of Evidence of Mr Lemberg, however this does not mean I am in agreement with any of his views by virtue of omission.

2.0 The evidence of Mr. Lemberg

2.1 I will address the rebuttal points under two headings: Form, Scale and Massing; and Communal Garden / Amenity.

2.2 Form, Scale and Massing

2.2.1 At Para 7.25 Mr Lemberg states

'... It is acknowledged that the three storey central element of Appeal proposal is in a closer proximity to Station Road than the three storey element of the Care Home. That said, it is felt that the height of the central wing is entirely appropriate in that it has a ridge line that is set no higher than the two and a half storey frontage of the building.'

Mr. Lemberg is clearly focusing on the height of the building as justification for his design approach. It is however the scale* of the proposal and the three-dimensional view of 3 storey elements from the street together with the relationship with adjacent buildings that is the concern.

At Para .7.28 Mr Lemberg refers to the height comparison drawing: Appellant Appeal brochure 12, that compares the height of the rear portion of the Appeal scheme and the care home. I agree that the Appeal proposal is lower or of a similar height to the 3 storey care home at this set back from the street, however the reality is that the massing of the Appeal scheme will be seen as more prominent and dominant in the street scene. See Verified View Fig4 View2 -Appellant Appeal Brochure 05.

I have appended an image of the care home (reference EM3, taken from the DAS for that application) which illustrates how this building relates to the

street and Reed House. Its form, positioning and significant area of landscaping will ensure it is well integrated into the street scene.

* 'Scale... relates both to the overall size and massing of individual buildings and spaces in relation to their surroundings, and to the scale of their parts...'(*Para 26. National Design Guide*).

2.3 Communal Garden /Amenity

2.3.1 Mr . Lemberg at Para 7.41 states

'..... the Appeal scheme does achieve the required provision amount of 975 sqm. Please refer to Appeal Brochure Section 11 – Usable Amenity Drawing that indicates the retirement scheme achieving 978sqm of amenity space. This figure discounts certain narrow strips around the parking zone and the pinch point between southern and eastern zones.'

In my proof (para. 7.2) I have calculated that the communal garden provision was in the region of 790 sq.m. I have appended a drawing EM4 to explain how I have arrived at this figure, together with the following points:

- Western frontage adjacent to the public realm. This area is too narrow to be used as communal garden and is exposed to views from the street that would compromise private amenity.
- Communal gardens should not affect the privacy of residents' internal accommodation. A zone adjacent to the building next to bedrooms / sitting rooms is therefore excluded from the calculation.
- Communal gardens should not affect or be double counted with private amenity.
- Left over areas that are buffer areas between entrances, access ways and car parking are unlikely to be attractive areas to sit/use and are not counted.

2.3.2 Mr. Lemberg (Para 7.38) states that *'... The District Design Guide SPD does not provide any guidance on amenity space provision for specialised accommodation for older persons. In a general needs residential development consideration would need to be given to serving the needs of a wide range of residents, including families with children, and young people. In a retirement*

housing scheme users are restricted to a group of people with similar needs and requirements, namely older residents, and it is not therefore necessary to provide a variety of different types of space....'

The District Design Guide does not differentiate communal garden space allocation for different users; however, I fail to see why older retired residents should be disadvantaged with smaller space standards, particularly as the health benefits to older people of exercise (and Vitamin D) are well known.

Please see Appeal Decision Mill Road, Royston Ref:

APP/X1925/W/18/3213068 Para 15 (Appendix EM5) where, in assessing a scheme for no. 41 retirement living apartments, the inspector found that the level of amenity space was unacceptable because it did not ensure that there was a suitable area for sitting out or indeed exercising.

- 2.3.3 In Mr Lemberg's proof, Para.7.45, he considers that positioning balconies within other parts of the scheme would not be appropriate. In my opinion all upper floor apartments should have the benefit of a balcony, and a well-designed building would be able to accommodate balconies that complement the street scene, and avoid issues with overlooking.

3.0 **Appendices**

EM3- Image of care home (Extract from DAS -Application S/3809/19/FL)

EM4- Site Plan indicating areas of communal garden space

EM5- Appeal Decision Ref: APP/X1925/W/18/3213068