## Strategic Planning Committee 04/08/2020 Dukes School Neighbourhood Resident Association's Presentation Planning Application 19/00500/FUL

The Association, representing 70 members, has presented detailed objections (March 2019, May 2020). It has carefully considered the officer's report and finds its conclusions flawed and unjustified. Committee is urged to refuse the application.

The Report Appraisal considers whether 'the principle of development' is acceptable (7.5-8) and concludes that it is. This is premature. The proposal includes development on an area of Local Green Space (LGS) in the adopted Neighbourhood Plan. The NPPF states that LGS can only be developed in 'very special circumstances' (VSC). This is the same high test that development in the Green Belt must meet. Any proposal cannot be acceptable in principle until it is concluded that VSC exist. **They do not.** 

The officer report argues that:

1... the development secures the future of the listed school and that developing the south end protects its setting and is a VSC. It is not.

The applicant has not demonstrated in a financial appraisal that securing the building's future is dependent on this scale of development. The scale and mass of the retirement living building viewed on the main approaches into the site will harm the setting of the school.

2..... providing a replacement playing field amounts to a VSC. It does not.

The replacement at Greensfield is simply necessary to meet Sport England's policy regarding playing fields. This requirement is neutral in terms of justifying development of a LGS.

3.... the development in providing a range of housing, including affordable housing, meets a range of needs and is a VSC. **It is not**.

There is no housing shortfall locally or in Northumberland. DSNRA's May 2020 objection shows a 43% **overprovision** locally. DSNRA accept that there is an ageing population projected for Alnwick but meeting a need for retirement living does not constitute a VSC as provision need not be at the south end of the site nor of the scale proposed.

4..... due to limited sites in the county, this kind of opportunity is a VSC. It is not.

The Association accepts the site is identified in the Neighbourhood Plan for mixed development but the opportunities could be provided by sensitive new development on the east side as the ADNP directs.

- 5..... providing open space over a third of the site adding to public open space in the town is a VSC. For two reasons **it is not**.
- i) Development on the Dukes School site proposed in the ADNP (policy CF5) would also deliver public open space but the Neighbourhood Plan specifically directs development to the east side of the site. The LGS is designated to the south because it allows better integration of the new parkland with Swansfield Park, safeguarding and incorporating the mature lime trees into the park, adding value and interest. The trees were a key reason for the LGS designation. They create a beautiful, ecologically important green space. The development proposed achieves neither objective and entails felling 12 mature trees to create the main access. Moreover, there is no management agreement proposed for the remaining trees' future, leaving them at risk.
- ii) Although the report references measures to protect the parkland, there is no guarantee it would be safeguarded. Officers have failed to require a S106 clause to control delivery of the public open space. It is not transferred into public ownership, no funds are secured for its maintenance, nor is there a legally enforceable guarantee that it will remain available in perpetuity.

DSNRA remains concerned that the scale, mass and design of the retirement living block will impact on homes in Swansfield Park Road and in particular is insensitive to the distinctive heritage and setting of the site, a large open green space which has been a valued feature of townscape character for over a century.

The DSNRA accepts that the proposed development would bring benefit in securing the future of the listed building, generating jobs and securing parkland to augment Swansfield Park in a town with limited open space. However, all these benefits would have been provided by sensitive new development on the east side proposed in the Neighbourhood Plan. The harm outlined in DSNRA's objections to the scheme outweighs these potential benefits. There is no justification for a development of the scale, location and design proposed, where 66 units are located at the southern end of the site on designated LGS, contrary to the Neighbourhood Plan.

Granting permission would be a departure from the ADNP without justification.