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Planning Application 18/00356: Sunningdale Park.
Parish Council Recommendations

Our Parish Council is writing to object to this application for the reasons set out below.

But first we wish to express our concern that our Parish Council wasn't notified of the application or invited to comment. The development is flanked by and accessed from Larch Avenue, which is in our Parish and will therefore impact on it. We didn't receive a response to our request to be formally notified.

We are also concerned at the length of time taken to place the many documents on the planning portal beyond the date the application was validated. As a result we haven't been able to properly consider our responses by the 30th March 2018, which we understand to be the deadline for comments. In view of this, and the size and complexity of the development and the large number of documents comprising the application we ask that the period for comment is extended to allow our recommendations to be taken into account.

Our Parish Council commends a number of aspects of the proposals, including:

- Retention of part of the site for employment
- Provision of a mix of housing
- Provision of 1 and 2 bed affordable homes (but too few).
- The retention and upgrading of a number of existing historic buildings on the site.
- The restoration of the Grade II park and gardens, and their ongoing management.
- Public access to 19 ha of the park and gardens, including the SANG (but we have concerns re the visitor parking provision).
- The quality of the landscaping.
- The resulting biodiversity improvements.
- The provision of 2.4km of walking routes through the park (but note the absence of suitable cycle routes).
- The proposed avenue into the park from Larch Avenue provides a welcome view into the park (although we have concerns re the design of the flanking buildings and at the traffic that will use it).

However our Parish Council also has a number of serious concerns.

The developer has held a number of drop-in sessions to consult on the proposals. The display material was well presented and created a favourable impression of the proposals. As always, however, the devil is in the detail. Only when all 260 documents were available for review was a full assessment of this major and complex development possible. As well as the good aspects of the proposals listed above, our assessment has identified a number of concerns, which we present below.

These are significant and lead us to recommend rejection of the application

1. Design Concept.

The D&A statement sets out the design concept and vision for the redevelopment. Our assessment is that the proposals don't deliver this vision.

- * The redevelopment hardly '*nestles*' within the existing landscape. It consists of large blocks of 4 storey buildings and terraced town houses, and a significant number of trees have to be removed to accommodate them. The main residential area is raised up above the existing ground level over a significant area to accommodate the 'underground' parking.
- * The removal of 300 trees, of which approx. 164 are within the redevelopment site, is hardly compatible with the spirit of the vision, which is 'The retention of key veteran trees.'
- * The building of 12 dwellings within the walled garden isn't considered compatible with '*The full restoration of the walled garden*'.
- * We cannot see how rows of 4 storey terraced town houses close to the western boundary deliver the vision statement:
'Improvements of the Western boundary along Larch Avenue to allow for new high quality homes positioned to create new open views into the site for the public to enjoy'.

2. Existing Developed Site as shown in map 22 of NP/SS8 – Sunningdale Park

a. Contrary to NP/SS8.2:

This policy strongly favours redevelopment for educational and related services, hospitality or leisure. Residential development is proposed for a large proportion of the site. This policy requires that any proposals resulting in the loss of jobs will only be considered if it can be demonstrated through a detailed viability assessment that the provision of uses creating employment are not viable or appropriate and provided that the development will deliver considerable benefit to the local community. We don't believe this has been adequately demonstrated. We also understand that a change of use application may be required.

b. The over development and the layout of the buildings impact significantly on the openness of the green belt.

The site is a major developed site in the green belt where infilling development or complete or partial redevelopment may be permitted in accordance with saved LP policy GB9,

However we consider the proposals to be contrary to saved LP policy GB9 (B) and (C), to NPPF paragraph 89 (bullet 4) and saved LP policy GB2 (A):

A number of aspects of the development, when considered together, have a severe impact on the openness of this green belt site. These include:

- * The redevelopment occupies a larger area of the site than the existing buildings. For example, both the Glade and the Woodland Courtyards block nearest the Gloucester Stables occupy areas not previously built upon. They are also generally higher – Contrary to LP policy GB2 (3), GB9 (B) 2 and GB9 (C) 2.

- * The increased area of development, the increased building heights, and the grouping of the buildings around courtyards all add to the apparent mass of the buildings and increases the negative impact on the openness of the green belt - Contrary to GB9 (B) 3.
- * Steuart Terrace, Crosley Terrace and McKensie House form a line of 4 storey buildings along the Larch Avenue boundary, impacting negatively upon the street scene, the views into the site and the openness of the GB - Contrary to GB9 (B) 3.
- * The Larch Avenue entrance into the site between, Steuart and Crosley Courts, is closed in by 4 story buildings on both sides, with no lateral views - Contrary to GB9 (B) 3.
- * The courtyards between The Steuart and Crosley Terraces and Steuart and Crosley Courts are set well above the existing ground level which impacts on the openness of the GB. It is effectively like a 1 to 1 1/2 storey building.
- * The increased height of the buildings is contrary to saved LP Policy GB9 (C) 1.

c. The redevelopment doesn't respond adequately to the local character of the area, contrary to NPPF paragraph 58 (bullet 4), saved LP policies H11, GB 2 (B) 1, 2, 3 & 5, NP/DG1.2 and NP/SS8.

NP/SS8.4 requires residential development to have regard to the key characteristics and description of the borough's Townscape Assessment classifications "Villas in a Woodland Setting" or "Leafy Residential Suburbs".

It isn't realistic for the redevelopment to stick rigidly to these classifications, but it is incumbent upon the developer to seek to replicate the look feel of these classifications and responds adequately to the local character. For example, in the design and massing of the dwellings along Larch Avenue, and in the boundary treatment. Instead the dwellings are in long 4 storey terraces set close to the boundary, leaving little room for enhanced boundary landscaping. We are concerned that no enhanced landscaping / tree planting is proposed along the Larch Avenue boundary in the planting strategy.

Many of the 3 and 4 storey buildings are set around courtyards, and this increases their apparent mass, resulting in a more urban character. The high density of development (over 50 dph) and the loss of a significant number of trees, add to the urban feel.

This is a narrow site flanked by Larch Avenue (villas in a woodland setting) on one side and by a Grade II registered park and gardens within the green belt on the other. Both the park and the site contain a number of historic buildings, including the Grade 1 Northcote House.

Looking west from the park the residential development presents an almost continuous 'urban' frontage of 4 storey buildings, which is at conflict with the character of the park, and will harm the amenity of the park, particularly in when the trees are bare. Contrary to saved LP policy HG1.

When looking into the site from Larch Avenue, the long 4 storey terraces of townhouses close to the boundary create a similar effect.
Contrary to saved LP policy HG1.

d. Affordable Homes:

We welcome the inclusion of affordable homes but are concerned that 23 homes (14%) is far too low a number. They are all 1 & 2 bed apartments and the tenure type of all is 'shared ownership'.

We question the viability of such a tenure arrangement as the developer is undertaking to maintain both the development infrastructure and the Grade II registered park and gardens in

perpetuity. If the costs are to be covered by charges on the residents and the care home the annual charge is likely to be very high and unaffordable by shared equity partners.

There is a shortage of genuinely affordable homes in our area, and we would wish to see a range of tenures to meet local needs, including social / affordable rental housing. These should include affordable family homes.

We don't consider the 'Vacant Building Credit' argument valid as the vacant space is due to the closure of the Civil Service College in preparation for redevelopment. Also, the vacant space is student accommodation related to educational use, not C3 residential.

e. The loss of mature trees is contrary to NP/EN2.

The redevelopment of the site results in the loss of 164 mature trees and there are no firm proposals to replace them.

f. The gardens to the Steuart and Crosley Terraces are too small for family homes, contrary to NP/DG3.2.

They are also overlooked by the 1st floor terraces and will get little sun owing to the shade from the trees and the 4 storey buildings themselves.

As a result there will be pressure to prune the trees severely.

g. The Glade:

We are concerned that:

- * The development is in a previously undeveloped area of the previously developed site and impacts upon the openness of the green belt.
- * A number of trees are removed to facilitate this development, contrary to NP/EN2.
- * A few of the dwellings are built over the RPA of mature trees.
- * The separation between some dwellings is too small in relation to the character of the area, contrary to NP/DG2.2 (c).

h. Contrary to NP/SS8.3 (e):

The Town Houses (Steuart and Crosley Terraces) are set close to the Larch Ave boundary, with little room for the enhanced green landscaping required by NP/SS8.3 (e). Currently no enhanced landscaping proposed.

i. Contrary to NP/T1.1 and T1.2 - Parking

We are concerned that the on-site parking provision for residents, staff and visitors to the care community, service vehicles, deliveries and tradesmen work in site is inadequate. We note that for

the 2 and 3 bed residential apartments there are 20 spaces fewer than the borough's maximum standard.

The bus service isn't regular and the site is some way from a station, so both residents and staff will rely on the car. Also, our area has a high level of car ownership per household. It is essential, therefore, that the on-site parking is set at generous levels.

The care home parking is of particular concern. Experience of similar Care Homes in our NP area suggest that the provision of 1 space for each care home, including the 60 fte staff, isn't adequate. As there is no opportunity to park off site there needs to be an area identified for additional in-site parking should it be needed.

We understand there will be 60 fte staff for the care home and associated facilities, yet only 10 parking spaces are provided. We also note that only 17 visitor spaces are provided for the 103 care home apartments. This seems totally inadequate, particularly at weekends, when many of the residents can expect visitors.

j. Traffic Assessments

We are concerned at the traffic impact on the area and in particular, on the junction of Larch Avenue and Silwood Road (poor visibility), of Silwood Road and the London Road and of Larch Ave and Rise Road.

We question the findings of the traffic impact assessment, which concludes that the traffic generation is unchanged. The residential nature of the college and the bus service from Sunningdale Station meant that many students arrived by public transport. Those who did arrive by car tended not to leave the site during their stay.

Also the pattern of traffic movement is very different. The residents and site workers in the new development will tend to leave and arrive at the morning and evening peaks, whereas the current uses have a more distributed pattern of traffic movements.

Table E2, volume 2 of the transport assessment shows 56 vehicles leaving the development during the morning peak. This looks very low in relation to the number of residential dwellings on the site, as it implies that the number of vehicles leaving during the morning peak is 1 vehicle from 30% of the dwellings.

The figures indicate that outside the peak hours there will be 34 vehicles leaving the site each hour. The traffic movements in and out of the site at peak periods when its former uses look high, bearing in mind the residential nature of the college

We therefore question the adequacy of the proposed highway enhancements and the failure to address NP/SV1 – Sunninghill Village Centre.

k. Refuse Collection

We consider the refuse collection proposals are flawed, as the refuse collection points are located too far from many of the dwellings.

l. Over provision of Care Homes

The provision of yet another 'high end' care home in our parish, which few locals will be able to afford, is of concern.

A number of new 'older persons homes' have been in our NP area over the past few years. With this development there will be over 305 such homes, which is over 55% of the RBWM need.

3. The registered park and gardens.

a. Developments within the registered park and gardens:

The application includes for the redevelopment of a number of existing buildings and for the construction of new dwellings within the registered park and gardens (green belt).

Our Parish Council supports the redevelopment of existing buildings as shown in the application, subject to compliance with the saved LP green belt policies.

The exception is the newly added extension to Northcote House, a Grade 1 listed building, to which we object.

We don't support the proposed new dwellings within the park and gardens, including within the walled garden, the additional gardeners and orchard cottages and the cottages by South Lodge, which are contrary to paragraph 90 of the NPPF and saved LP policies GB3 and GB8.

The Section 9 of the NPPF emphasizes the importance of protecting the green belt. The building of new residential dwellings in the green belt is considered inappropriate. Paragraph 90 states that the re-use of buildings is only permitted provided that the buildings are of permanent construction.

Saved LP policy GB3 states that there is a general presumption against allowing proposals for residential development in the green belt. The proposed housing doesn't fall into any of the exceptions listed or within the remit of GB8.

In any event the developer would need to demonstrate very special circumstances, and hasn't done so.

The Walled Garden is an important part of the registered park and gardens and the vision includes '*The full restoration of the walled garden*'. The construction of 12 properties within this garden doesn't fit with this vision or comply with GB policies. Only approximately 1/3 of the garden remains open to the public and owing to the presence of the housing people will feel uncomfortable taking advantage of it.

Other concerns include:

- * Together with the new orchard and gardeners cottages, etc, there will be approximately 25 dwellings in this part of the park, which is deemed totally inappropriate in the green belt and historic park.
 - * The roofs are visible above the wall and together with the parking, impact negatively on the openness of the green belt.
 - * The rear gardens to the 6 dwellings on the S side have very small rear gardens, contrary to NP/DG 3.2. They will get very little light owing to the height of the wall and dwellings.
 - * The dwellings on the N side don't have any private amenity space.
- b. The park and gardens will include a SANG and public open space, all for use of the public. Only 9 visitor parking spaces are provided (shared with the local school) and these are in the SE corner of the park by S Lodge. As there is no possibility of on-street parking we consider that more parking must be provided within the park, including some accessible from Larch Avenue.
- c. It isn't clear that the proposals comply with NP/SS8.3 (d) or NP/T2 regarding the provision of safe pedestrian and cycle routes for connectivity.

Sunninghill & Ascot Parish Council