

Sunninghill and Ascot's response to the Consultation on London Square Proposals for Ascot Green West.

1. Preamble:

We have pleasure in submitting our response to your consultation on the above site. This document was presented to the Parish Council for review and approval on the 10th May 2022. It was approved, subject to a few additions that have been incorporated.

Before going into detail we feel it appropriate to express our huge disappointment at your failure to prepare a development brief for the site in accordance with policy NP/H1 and Appendix C of our Neighbourhood Plan (NP). As you are aware, the proposals for the redevelopment of Ascot arose out of detailed consultations with our community and were developed in partnership with the Prince's Foundation. Their report sets out the community vision and received overwhelming community support when presented at a consultation event. The event included an exhibition at which the community could ask questions / comment on the proposals. This was followed by a public meeting attended by over 300 residents, who gave the proposals overwhelming support. The NP was subject to a further consultation and a referendum, where over 90% of the many respondents supported the NP, which was adopted in 2014.

Subsequently three developers prepared a Development Brief for the AL16 site in conjunction with local stakeholders and the public. The starting point was a vision statement (page 3 of the Development Brief), which was agreed by local residents, our Parish Council, local stakeholders, the Borough and the Prince's Foundation, following a series of workshops and meetings. A consultation on the Development Brief was held in April 2018. It was well received by the community, but with some reservations re the high density of development in the NW sector of this site. The Brief kept to 300 dwellings, of which 99 were proposed on this section of the site.

The Local Plan policy QP1c and site proforma AL16 picked up on this and incorporated many of the requirements of the vision in policy QP1c and site proforma AL16. Paragraph 6.8.6 of QP1c identifies the "strong community aspiration for a new village square or community hub, with a relocated library and parish council offices as well as a community/arts centre and public open space".

The community has always fought against the number of dwellings allowed on the site (approximately 300), which is significantly higher than envisaged by the community, as presented in the Prince's Foundation Trust.

In summary our community has been instrumental in releasing this green belt site for development and been visionary in proposals. It is estimated that as many as 1000 residents have endorsed this vision, with many inputting into its development. It is therefore disappointing to find that London Square has failed to work with local

stakeholders to ensure their proposals deliver a development that achieves the community vision and delivers a scheme we can all be proud of.

We will also be writing to the planners to make them aware of our concerns regarding their influence on the proposals, which seem, in places, to be at variance with the Vision they and all other parties signed off following consultations and workshops (Page 3 of the 2018 Ascot Centre Development Brief) and with the specific site requirements as presented on site proforma AL16.

The borough also seems to have lost sight of its LP Spatial Vision and Objectives. The four main themes of the Council's vision for the future of the Borough (4.1.1) include:

- Residents First, and
- Delivering together.

2. Parish Council review:

Our Parish Council has looked at London Square's proposals in 3 ways:

- We have reviewed and commented on the proposals in general.
- Assessed how well the proposals deliver the agreed vision for the development of Ascot Centre.
- Reviewed the proposals for compliance with the policies as set out in our Neighbourhood Plan (which carries full weight), the Local Plan (adopted March 2022) and The Borough Wide Design Guide.

In the absence of a Development Brief we sought to gather more details of the proposals from the consultation on 5th May 2022, in order to ensure our feedback is soundly based. Our parish councillors who attended as of 10th May received conflicting information and we are awaiting further information promised to us.

3. Overview of the proposals:

Our first impression is that the site is over-developed and its built form doesn't fit comfortably with the character of the local area, which has a less urban feel. The number of houses proposed (**approximately** 135) represents 45% of the allocation for the 3 sub-sites that make up AL16. This either leaves the other two developers with an allocation of approx. 165 between them or sets a precedent for 405 dwellings across the whole AL16 site. We consider both outcomes to be unacceptable. Whilst the proforma specifies approximately 300 dwellings we strongly believe that a 35% increase is way beyond 'approximate' and the numbers must be reduced to 100. This can easily be achieved by removing flats 104 and 137 plus all the flats to the east of the N-S access road and reconfiguring the remaining houses as semis and/or using the vacated sites for much needed additional parking.

We like the massing and separation of the two 4 story blocks in the NW corner as it reduces their dominance on the street scene and delivers a longer active frontage.

We would, however, recommend that the 4th storey is set back from the edges to further reduce their dominance.

We also like the public areas between and around the blocks. We are concerned, however, that the new retail and commercial space fronts Station Hill and doesn't deliver the desired two-sided High Street, to its detriment.

The masterplan shows the community hub and meeting space (2) in and adjacent to the commercial space to the NW of the site. This doesn't deliver the vision of a flexible community arts space along the lines of the Fire Station in Windsor, now the Old Court (ref page 16 of the Prince's Foundation Report) with an adjoining community square. We understand a visit to the Old Court has been arranged for w/c 9th May. Note that our parish council proposes to relocate its office and meeting space to the new development, and we will provide our requirements when needed.

We are concerned that the fragmentation of the paved public space dilutes its value as a versatile space where our community can come together and "will form a new heart to the centre and create a vibrant day and night time economy with primarily small independent shops, cafés/restaurants, community uses and civic buildings" (ref: paragraph 4b policy of LP policy QP1c). As noted above, we would like a square alongside the community hub so they can work together where appropriate. The square needs to be large enough to work as a flexible gathering place for the community, with high quality paving and landscaping.

We welcome the provision of 30% of public green space, which we understand to be a Council request, but it doesn't allow the provision of the community square, a key element of the Ascot Vision. There is a need to balance the benefits of the public green open space with the benefits of a larger community square and our recommendation is that part of the green space that fronts the High Street is replaced by a square, which will provide a more versatile year-round community space and improve the connection between the High Street and the retail / commercial area at the western end. There can be a discussion on the size and geometry of the 'square' needed to deliver the community vision while retaining adequate green space.

We are advised that the only 4 storey buildings are those that front the highway (pink on the plans). We don't support 4 story elsewhere in the site. Although the artist sketches indicate the houses and flats to the east of the N-S road are 3 1/2 story, we are advised they are all 3 story. We consider that the predominant 'residential height' in the vicinity to be 2 or 2 1/2 storey. They are in groups of terraces, split up by only 3 narrow accesses, and this, together with their height make them overly dominant on the street scene. This would be relieved by removing the gables. We point to the example of the Ascot Green Houses shown on page 18 of the Prince's Foundation Report, which are semi-detached. Something similar could be achieved by removing all the flats to the east of the N_S road. This would also reduce the housing numbers to around the 100 target we are looking for.

The designs of the houses and flats that form the U around community gardens aren't shown, and we would like to see your thoughts. We are advised they, too, are

3 story, but we would prefer these to be 2 ½ storey with 3 beds to widen the housing mix. We aren't keen on flats 104 and 137, which are located above the arches over the road to the west of the U-shaped development.

We are uncomfortable with the proposed housing mix. In all recent new developments in our parish flats have dominated and this development continues the trend, with a ratio of 75% flats to 25% houses. We have been advised that all the houses have 4 bedrooms, or possibly 5 bedrooms, and that the apartments will have 1 or 2 bedrooms. We are concerned the houses are all expensive high-end properties and there are no more affordable smaller 2 and 3-bedroom houses.

It is important that all dwellings provide private daylight and amenity space for the flats and houses in accordance with the RBWM borough wide design guide principles 8.3 -8.6. It is not clear that all do as many gardens and balconies will be shaded by trees.

Parking is a major concern as we understand the council is trying to drive down the number of residential parking spaces. We also understand that NO parking will be provided for the employees and visitors to the commercial properties, **a major omission.**

At the community consultation event on 5th May '22 we were given several different parking figures and request clarification of your proposals.

As noted at the stakeholder meeting of 26th April '22, the BLP Inspector made it clear that no maximum parking provision should be set where the surrounding streets are unable to accommodate any overspill, as is the case here.

We request a meeting with you when you have been able to absorb our comments to discuss how our concerns can be addressed.

4. Alignment with the Community Vision for the rejuvenation of Ascot:

The initial vision was developed by the community supported by the Prince's Foundation. The original 3 developers of the AL16 site prepared a Design Brief (DB). The starting point of this was to agree on the vision the DB had to deliver. A series of workshops and meetings were held to agree on its wording, which is presented on page 3 of the Development Brief. It has been agreed with local residents, representatives of the Parish Council and stakeholder group, the Royal Borough of Windsor and Maidenhead and the Prince's Foundation.

The following is a summary of the vision and our assessment of its delivery.

a. Enhance the High Street:

- Increased flow of traffic by improved parking.
Not covered by proposals
- Make streets safe with accessible pedestrian and cycle routes, particularly E-W routes parallel to the High Street.
Partly covered by pedestrian and cycle routes through the site.

We understand that you have done work to assess the impact of the development on traffic flows at the site entrance and at the Station Hill / High Street roundabout, but this hasn't been provided. We had understood from clause 13 of site proforma AL16 that the funding of enhancements to the public realm outside the site to be shared by the developers, but you advise that this is yet to be agreed. We strongly believe it must be provided by the developers.

- b. Turn Ascot into a focus for the community with a vibrant daytime and night-time economy by providing:
- Community facilities.
Delivered but not as envisioned (ref: the Old Court, Windsor).
 - A local village square.
Not delivered as envisioned.
 - A two-sided High Street
Not delivered. The new commercial area is well separated from the rest of the High Street by the public green space.
 - A range of small retail units suited to independents.
We are advised the units provided will be focused on small independents but there is no commitment to do so.
 - A green space to the south side of the new two sided.
Delivered but at expense of fragmented public space and the envisioned village square.
- c. Enable this rejuvenation by providing a high-quality development of new homes, having regard to good local examples of architecture that responds well to the green and leafy character of Ascot.
Not delivered. We consider the architecture of the 3 story houses and apartments doesn't respond to the local character as most are terraced and dominate the street scene. We also have concerns about the housing mix as 75% are flats and all houses have 4 or 5 beds. There are no 3 bed houses or flats.

5. Compliance with the key Local Plan and Neighbourhood Plan Policies:

Neighbourhood Plan Policies:

NP/H1 and NP/SS1.1 – Development Briefs

No development brief had been prepared and the masterplan has been prepared without engaging actively in consultation with the Parish Council, stakeholder groups or the community. The consultation was too short (27th April to 10th May) and wasn't widely advertised. Just 3 or 4 boards were shown at the consultation on 5th May '22 and there wasn't a formal presentation of the proposals.

We consider the consultation is falling well short of what is expected for such a major and important development adjacent to the internationally renowned racecourse.

Local Plan Policies:

The most relevant LP policy is QP1c – Ascot Strategic Placemaking Area and site proforma AL16.

We wouldn't expect all these policy requirements to have been complied with at this stage of development. The proposals should, however, comply with QP1c.4.c and with the AL16 requirements 3 but don't.

6. Compliance with RBWM Borough Wide Design Guide:

We expect the application proposals to comply with the design guide, including, for example:

- Parking to comply with Principles 6.7-6-10, re parking at front of buildings and the need for underground parking.
- Housing mix and tenures to comply with Principle 7.2
- Sunlight access and private amenity space to comply with Principles 8.3 – 8.6.

7. Summary and Recommendations:

At the Parish Council meeting of 10th May all Councillors expressed their extreme concern at the cavalier way London Square has gone about the development of their proposals for Ascot Green West. Although they have been in discussion with the Council for a year they haven't consulted with any of those who have been involved in the development of Ascot Centre for 10 years, including those who conceived the concept and worked with the Prince's Foundation and the community to turn this into a vision and development framework for Ascot Centre.

The first meeting with stakeholders, including our Parish Council representatives, was on 26th April, the day before the start of a 2-week community consultation.

The consultation documentation presented to the community was short on detail but big on visuals of all the attractive features of their proposals, no doubt in the hope of a favourable outcome.

The consultation on the site on 5th May was poorly advertised and poorly attended. We found that different answers were given to the same questions from our Cllrs, and the additional information promised to one of our Cllrs hasn't yet been received.

A Development Brief is a requirement of policy NP/H1 of the made neighbourhood plan (which remains a current policy, as confirmed by the BLP inspector) and the consultation was not conducted in accordance with good practice.

The whole lack of due process shows a huge disrespect for our community including those who have devoted 10 years trying to ensure the vision is delivered.

We expect London Square to start engaging proactively with our Parish Council and the community as the planning application evolves, with the objective of producing a proposals that deliver our community aspirations and are of a form and quality of which we can all be proud. We will fight hard to achieve this outcome.

Summary of Key Concerns:

- **The developer has failed to prepare a development brief, contrary to NP/H1 and to consult effectively on their proposals.**
- **The housing numbers are 35+ % too high, the percentage of flats (75%) is far too high and there are no 3 bed family homes.**
- **The proposals fail to deliver the community aspirations and vision.**

For example:

- The essential elements of the community vision, the square and community arts centre are missing.
 - The proposals don't deliver the two-sided High Street.
 - The proposals don't respond to the requirement to contribute to the High Street enhancements, efficient traffic flows, parking improvements and connectivity to S Ascot.
 - The housing numbers / density far exceed the community expectations as set out in the Prince's Foundation Report and are 35+% above the appropriate share of the AL16 site allocation.
 - The terraced form of the 35 No 3 story houses isn't typical of local housing architecture or the green and leafy character of Ascot.
- **The proposals don't comply with key LP policy QP1c, requirements in the site allocation Proforma AL16, or with key Principles of the RBWM Borough Wide Design Guide.**
 - **The parking provision looks well below the projected demand.**
The parking provision is unclear but from the information provided there are far too few parking spaces to meet the demands of residents, employees, shoppers and visitors, contrary to policy NP/T1.
At the Stakeholder Meeting of 26th April Cllr Deason read out paragraphs 283 & 284 of the Planning Inspectors final report ID34, which warns against setting a maximum standard where their adoption would result in blocked and congested streets and pavement parking.

Recommendations:

We ask that London Square engages with the community stakeholders between now and the submission of a planning application in order to address concerns and

hopefully arrive at proposals that comply with local plan policies, the Borough Wide Design Guide Principles and the community vision that the community can support.

We believe this is possible.

We request that the following recommendations are adopted (over and above delivering the agreed vision):

- Reduce the number of dwellings to 100.
- Provide some 3 bed houses for local families.
- Set back the top story of the 4 story mixed use blocks.
- Remove the 3 blocks of flats to the east of the N-S road and make the 20 3-story houses into well-spaced semi-detached homes with sensible separation. An exemplar of the type of houses considered acceptable by the community is shown on page 18 of the Prince's Foundation Report; these are less dominant as they don't have gable ends.
This will also address our firm requirement that the housing numbers don't exceed 100.
- Provide adequate parking, including for the employees of the commercial space, visitors to the houses and commercial premises, and trades vehicles.
- Comply with the sunlight and amenity space requirements of the RBWM Borough Wide Design Guide.

Cllr. Peter Deason

For and on behalf of Sunninghill and Ascot Parish Council.

12th May 2022.