

Planning Application 22/01431 – RSG Motor Group Halfpenny's Garage, Kings Road Sunninghill

Sunninghill and Ascot Parish Council's response to the above planning application.

Our parish council is deeply concerned at the proposed development and strongly recommend refusal for many reasons, including the damage it will cause to the character of the village, to the setting of the historic Cordes Hall and to the amenity of the adjacent properties. It fails to comply with many of the policies of the applicable made planning documents, including the recently adopted Borough Local Plan (BLP), Sunninghill and Ascot Neighbourhood Plan (AS&S NP) and the RBWM Borough Wide Design Guide (BWDG).

1. Summary of primary objections:

- a. The applicant hasn't consulted with the community on the current proposals, as required by the guidance in table 2.1 and in table 4.1 step 3, engagement, of the RBWM Borough wide Design Guide.
- b. The proposal represents a significant over - development of the site and doesn't respect the building lines in Kings Road or the High Street.
- c. The development fails to respect the Victorian character of its immediate setting and of the wider village, as required by NP/DG1.4 – Respecting the Townscape and by Objective 1ii section 4.3 of the Local Plan – Special Qualities.
- d. The design of the proposed building fails to respect the grain, layouts, rhythm, density, skylines, scale, bulk, massing, proportions and footprint of the local built and natural environment, or with the Village as a whole, as required by policies QP3.1b, NP/DG2.1 and principles 7.6.1 and 7.6.2 of the Borough Wide Design Guide.
- e. The food retail store is too large for the small village and is unnecessary as the local needs are met by the two existing convenience store and by the third which is expected to open soon (ref: LP Policy TR5).
- f. The proposal severely damages the setting of the historic Cordes Hall by virtue of its sheer scale, mass and style and by masking the valued views of the Cordes Hall when entering the village from the north and the backdrop of trees when viewed from School Road and the High Street, contrary to LP policies HE1 and HE1.2, QP31b and 1f, and NP policy NP/DG4.
- g. The proposal fails to deliver the required private and communal amenity space for flats as required by LP policy QP3.1 I and Principles 8.5.1-8.5.4 and 8.5.6 of the

Borough Wide Design Guide.

- h. The applicant is not proposing to provide any affordable homes, as required by LP policy HO 3.5b, on viability grounds.
- i. The on-site parking provision is inadequate, with a deficit of 15 parking spaces, and isn't in accordance with the RBWM parking strategy for a location poorly served by public transport and with policies NP/E3.2(b), NP/T1.1 and 1.2 and NP/SV1.1, 1.2 and 1.3.
- j. At least 4 HGV deliveries will coincide with the morning traffic peak, the drop-off to St Michael's Primary School and the Marist and store visitors linked to the School drop-off. Traffic flows at the junction are severely impeded by the on-street parking in the High Street and Kings Road and the pedestrian crossing in the High Street. We believe that the deliveries will add to the congestion at the junction and will have a negative impact on the air quality, noise and safety of vulnerable pedestrians, including the pupils of St. Michael's Primary School, contrary to LP IF2.3f.

We have reviewed the Planning Statement contained in section 9 of the Design and Access statement and consider many of the policy responses are seriously flawed and should be disregarded.

2. Context:

Sunninghill is an attractive and vibrant Victorian village of great character and is much loved by residents and visitors alike. The good variety of retail and services, mostly small independents, makes it a popular destination.

The downside is that it suffers from a severe deficit of parking and the High Street is frequently congested. The Village is a popular cut through from the A329 London Road to the A30 south of the village and to the A30 at Sunningdale via Sunninghill Road and Kings Road. This causes congestion at the junction by the site, exacerbated by the on-street parking in the High Street and Kings Road, which effectively reduces both roads to a single lane, and by the pedestrian crossing in the High Street close to the junction.

The village has 2 convenience stores very close to the proposed development. A third, larger store at the south end of the High Street is preparing to open shortly.

There is a buoyant night-time economy, due to the 4 restaurants and a take-away close to the site, events at the Cordes Hall and after school activities at St. Michael's School.

The Cordes Hall is home to the Quince Players and Spotlight drama groups, a community cinema and other community activities, all of which add to the parking problems and extend them well into the evening.

There are two landmark buildings in the village, the historic Cordes Hall and St

Michael's Primary School. Landmark views include the school and views across the school playground towards the High Street, Cordes Hall and the development site, and to the Library and The Terrace. A feature of the Village is the backdrop of trees which are a strong feature on the skyline in views from School Road and the High Street towards the Cordes Hall and the site.

The development is on a prominent busy corner position at the northern gateway to the High Street and lies opposite the Cordes Hall, an attractive historic building. Its design therefore needs to be sensitively handled so it fits comfortably into this setting and is in harmony with and respectful of its surroundings.

3. Outline of Development Proposals:

The development is at the north end of the commercial area of Sunninghill village, a Local Centre, but is separated from the rest of the centre by Kings Road. It lies within the RBWM Townscape Assessment Classification 5D - Victorian Villages (ref: Fig 3.7, vol 3 of the Townscape Assessment). The proposal is for 14 flats and a 328 sqm food retail store. The residential density is 79dph.

The building is a 3-story contemporary building with an unbroken frontage of 60m on Sunninghill and Kings Roads. The building façade is mostly set just 1m from the highway. The prominent NW and SW corners rise over 10m above the highway. The 2nd Floor is set back 1.3m from the main frontage, but the benefit of this is largely offset by the solid perimeter parapet and the roof overhang of around 0.5m.

The building will block most of the landmark view of the historic Cordes Hall (1902) from the Sunninghill Road when entering the village from the north, and when viewed from School Road it masks the backdrop of trees to the Cordes Hall (ref: Appendix B).

There are 14 flats and a food retail store is 328 sq.m, the size of the average Tesco Express store

There are 23 parking spaces for the 14 flats, a deficit of 4, and 11 for the food retail, a deficit of 11, giving a total deficit of 15 spaces.

There will be 8-9 deliveries each day, of which 4 will be by 12m HGVs, two by 10.4m HGVs and 3 by 5.5m LGVs.

4. Detailed Objections:

a. Community involvement has been limited, contrary to the guidance in table 2.1 and in table 4.1 step 3, engagement, of the RBWM Borough wide Design Guide.

The developer conducted a limited consultation in or around August 2021, but the application doesn't include a consultation report. Since this consultation the character of the development has changed significantly, from a style that

sought to respect the local character to a contemporary design, which is at total variance with the local character. This change was made without any community engagement or consultation despite the site being in a very visible location opposite the Cordes Hall, an Historic and gateway community building.

Both the developer and planners seem to have already forgotten the 4 themes that underpin the Strategic Objectives of the recently adopted Local Plan, which include 'People first' and 'Deliver together'.

b. The proposals represent significant over-development of the site.

The residential density, at 79dph, is over 64% higher than recommended in the HELAA for the site (48dph) and there is inadequate external space to accommodate the required parking, external shared community amenity space, essential external M&E equipment and trolley storage.

The building extends some 7m forward of the building line on the north side of Kings Road and approx. 2m forward of the building line on the east side of the High Street, contrary to policy NP/DG 2.2a.

c. The size of the food retail store (the size of the Tesco Express proposed in Sunninghill but refused at appeal) is too large for the small village of Sunninghill and contrary to the intent of local plan policy TR5.

Local Plan Section 9.12.1- Local Centres states: "in general (Local Centres) include a range of small shops serving a localised catchment. Typically, they may include a convenience store, newsagent...(etc)".

Local Plan policy TR5 states: "local centres will be supported to provide a wide range of services for their local community, mainly serving specialist needs or immediate needs of their local area".

Paragraph 3.53 of the Transport Statement claims the store will have a small local catchment area, with adjacent areas each having larger stores, and hence is considered unlikely to attract a large proportion of entirely 'new' shopping trips.

The proposed retail unit is defined as serving the local catchment area. The village already has two convenience stores very close to the proposed development (of approx. 200 sq.m each), A third larger store, at the south end of the village, is expected to open shortly and is far better placed to serve the larger residential catchment area to the South of the village. The immediate needs of the area are therefore well served and give customers a good choice. A fourth larger food retail store is both unnecessary and inappropriate for the size of the local catchment of Sunninghill.

d. The development fails to respect the Victorian character of its immediate setting and of the wider village, contrary to NP/DG1.4 – Respecting the Townscape, NP/DG4 – Heritage assets and to Objective 1ii Special Qualities, section 4.3 of the local plan

The RBWM Townscape Assessment characterises each of the different townscape types for all towns and villages across the borough and gives

guidance for new development in each townscape type. Sunninghill is classified as a Victorian village (group 5D) and the Townscape Assessment provides both generic characteristics for this category and specific characteristics for Sunninghill.

Section 5 Victorian Villages describes the Key Characteristics of Victorian Villages, including the Built Form and Architecture, Public Realm and Street Scene and Guidance and Opportunities. The guidance includes:

- Take account of the Victorian Street and block pattern of regular streets and narrow plots. Developments that do not respond to the scale, grain and urban form should be avoided.
- Reflect the rhythm and variation of roofscapes. Intensive development that would disrupt this rhythm should be avoided.
- Development should demonstrate that it preserves and enhances the setting of listed buildings and respect the form and function of local landmarks.

The photographs in Appendix A show the buildings immediately around the site, and it is abundantly clear that the new building is very far from respecting the Victorian townscape of Sunninghill, the setting of the Cordes Hall or the sylvan character of Sunninghill.

The proposal is also contrary to Objective 1ii Special qualities, section 4.3 of the local plan which requires developments to:
'Retain the character of existing settlements through guiding development to appropriate locations and ensuring high quality of design of new development'."

The village of Sunninghill is recognised as having special qualities, and this proposal is the wrong solution in the wrong location.

- e. **The design of the proposed building doesn't respect the grain, layouts, rhythm, density, skylines, scale, bulk, massing, proportions and footprint of the local built and natural environment, or with the Village as a whole, as required by Local Plan policy QP3.1b, Neighbourhood Plan policy NP/DG2.1 or the RBWM Borough Wide Design Guide Principles 7.6.1 and 7.6.2 (Scale and Massing)**

The High Street and buildings surrounding the site are nearly all Victorian in style, with gables or ridged roofs and of modest size (see Appendix A).

The Retail shops on the east side of High Street are two story and semi-detached, and views of trees can be glimpsed down many of the alleyways. Their frontages and roof lines are varied and interesting. The Cordes Hall and Novello Theatre are both single storey. St Michael's school, also single storey, lies to the west of the High Street but set well back.

The residential buildings on the S side of Kings Road are also Victorian semi-detached dwellings with varying frontages and roof lines. Those more recent dwellings on the north side are 1 story (next to the site) or 2 story.

It is clear that the proposal is way beyond anything else in the village in terms of grain, layout, rhythm, density, scale, bulk, massing, proportions and footprint.

The following extracts from the developers Design & Access (D&A) Statement (Pages 15 and 25) and the photographs on Appendix A clearly show that the proposals will dominate the Cordes Hall, bungalow in Kings Road and cottages on the west side of Sunninghill Road



f. Contrary to Local Plan policy HE1.1 and HE1.2. Historic environment, and LP policy QP3.1f, and not in line with the Townscape Assessment development strategic principles for Sunninghill.

- HE 1.1 states that the "historic environment will be conserved and enhanced in a manner appropriate to its significance. Development proposals would be required to demonstrate how they preserve or enhance the character, appearance and function of heritage assets (whether designated or non-designated) and their settings and respect the significance of the historic environment".
- HE1.2 states that "Heritage assets are an irreplaceable resource and works which would cause harm to the significance of a heritage asset (whether designated or non-designated) or its setting, will not be permitted without a clear justification in accordance with legislation and national policy".
- QP3.1 sets principles for development to ensure it achieves sustainable high-quality design. Relevant principles include:

- QP3.1 b “Respects and enhances the local, natural or historic character of the environment” and
 - QP3.1f “Retains important local views of historic buildings and features.
- Paragraph 3.30 Volume 3 Section 3 of the Townscape Assessment – Sunninghill and South Ascot, sets the following strategic principles to be taken into account in the development design process:
 - 30.50.1 “The conservation of the well wooded ‘sylvan’ character of Sunninghill...”.
 - 30.50.9 “The Conservation of the St. Michael’s C of E Primary School, historic Kingswick House, the Cordes Hall and the residences in the Terrace as landmarks in Sunninghill. Development should not detract from these buildings as landmarks”.
 - Objective 1iii – Special Qualities of the Local Plan’s Strategic Objectives requires developers to “Protect the special qualities of the built environment including heritage assets.

The development clearly doesn’t comply with any of the above policies and principles. For example:

- Due to its height, footprint, bulk, scale and mass, and its position very close to the highway the proposed building will dominate the Cordes Hall and damage its setting.
- When entering Sunninghill from the north there is an early view of the whole of the Cordes Hall, a village gateway feature. The proposed building will block most of the view until the junction with King’s Road is reached.
- The building will also block the view of important trees as shown in Appendix B. When viewed from School Road and the High Street the Cordes Hall is framed by a backdrop of trees. The new building will largely hide these and will thus damage its setting. At present many of the views across the site include a backdrop of trees, most of which will become hidden by the new development, to the detriment of the ‘sylvan’ character of the village.

g. The proposals fail to deliver the amenity space requirements contrary to LP policy QP3.11 and Principles 8.5.1 – 8.5.4 and 8.6 of the RBWM Borough Wide Design Guide.

QP3.11 requires developments to provide sufficient levels of High Quality private and public amenity space. It doesn’t provide for this being off site, as proposed by the applicant.

8.5.1 states that flatted developments will be expected to provide high quality outdoor space for each unit.

8.5.2 defines the requirements for ground floor flats in relation to size and boundary treatments. Both the ground floor flats have inadequate amenity space and front directly onto public space – one is within a meter of Kings Road, and will be materially affected by noise and pollution, contrary to 8.5.4. It also poses a security risk.

8.5.3 defines the balcony requirements for flats above the ground floor. The balcony depths are within the range of 1 to 1.5 m deep whereas the minimum required depth is 2.0m

8.6 defines the communal outdoor amenity space requirement as 10sqm per flat, or 140 sqm in total. The community amenity space provided is only 19 sqm (the size of 1.5 parking spaces). It isn't connected to the building or screened from the public, lies directly alongside the HGV delivery bay (for vehicles up to 12m in length) and is close to the resident's parking bays.

Victory Field is no substitute for on-site amenity space.

h. Contrary to LP policy HO3.5b. – Affordable Housing.

The developer doesn't propose to provide any affordable Housing, citing financial viability. A viability report is included in the application. We find it difficult to understand how a small site such as this with a residential density of 79 dph and a 328 sqm supermarket can be unviable but leave it to the Borough to ensure its policy is rigorously applied. We note the lack of new sites for affordable homes in our Neighbourhood Plan area, and it is therefore important they are provided on site.

The Strategic Objective 2iii of the recently adopted local plan is to "provide housing to meet the needs of all sections of the community including a sufficient level of affordable home".

Not delivering affordable homes is at variance with the Strategic Objectives themes: Residents first, Value for money.

i. The Parking provision is below the maximum provision in the RBWM parking strategy (2004) and does not comply with policies NP/E3.2(b), NP/T1.1.and 1.2 and NP/SV1.1, 1.2 and 1.3.

The application claims that the location is between good and poor accessibility. As the stations of Ascot and Sunningdale are much further than 800m from the site [1.8 and 2.1m respectively] and the No 1 Bus service is infrequent [8 in each direction on weekdays, 6 on Saturdays and none on Sundays] the site clearly has poor public transport accessibility. The maximum residential parking requirement in the RBWM Parking Strategy is therefore for 27 spaces [ref 23 provided], and for the food retail is 23 parking spaces [ref 11 provided], a total shortfall. of 15 on-site parking spaces. This is contrary to policies NP/T1.1, TP1.2.2 and NP/SV1.2.

For the reasons set out below we don't consider that there is enough on-street

parking close to the site to absorb this shortfall in on-site parking.

Paragraph 284 of the final report on the BLP examination by the inspector is relevant here. It states:

'The 2004 Strategy sets maximum (parking) standards, and while MM46 requires some flexibility in their application would be contrary to the Plan's own intention to move to minimum standards. It would also be contrary to the Government's statement in March 2015 that the imposition of maximum standards led to blocked and congested streets and pavement parking, and the market is best placed to decide if additional spaces should be provided. I have therefore amended the wording of the modification to clarify that while the 2004 strategy can be used as a guide to the appropriate level of parking, it should not be used to set a maximum level'.

Policies NP/SSV1.1 and NP/SSV1.3 were included in the NP because the village has suffered from parking and congestion problems for over 20 years, and they are getting worse. Community consultations regularly show parking is at or close to the top of residents list of concerns.

The applicant's Parking study in the Transport Statement shows that the parking stress within 200m of the development is low, but we have several concerns over the validity of the study:

- It appears that the on-street parking study took place at 02.30 and 03.30 in the morning. If so, it is clearly unrepresentative, as it doesn't pick up the daytime parking for village workers and visitors. This would explain:
 - the low parking stress found in the High Street, which is mostly used by visitors,
 - The 25% in Queen's Road car park. There isn't a need for many residents to use the car park at night, but the un-restricted bays fill up by 08.30 when the workers at the auto repair shop start work, and the 2-hour parking bays fill up soon after 09.00 when the visitors come into the village.
 - The high night-time parking stress in the residential roads close to the High Street is high owing to the lack of off-street parking to many of the properties.
- The study was conducted during a period when not all lockdown rules had been removed, covid numbers were on the rise and people were generally nervous about going to public places, so the study findings are unrepresentative of the situation pre-pandemic, when there was a clear parking deficit. The parking demand slowly returned to around pre-pandemic levels following the end of lockdowns as the following limited spot checks from the 8th to 23rd June show:
 - Of 14 checks of the High Street parking between 08.30 and 16.15 found that the maximum number of free spaces at any one time was 3 and that the

average number of free spaces was 1.5.

- 18 spot checks of parking in the School Road car park showed it was full for most of the day, but there were one or two free spaces found during 3 of the afternoon checks.
- There were rarely any free spaces in School Road.

We accept that these are just 'snapshots' and a more thorough survey is required, but they do indicate that the parking pressures in the village are greater than shown in the Transport Statement and have returned to pre-pandemic levels, where there is a parking deficit within reasonable distance of the site.

- The study claims to cover the parking stress within 200m of the site but actually covers a significantly wider area (ref Parking restriction plan in Appendix 1 of the Transport statement).

A 200m walk from the site takes you to:

- The railway bridge in the High Street.
 - 20m into Bowden Road via the High Street.
 - To the entrance to the Queens Road car park via the High Street
 - To 20m short of the School Road car park via the High Street and School Road.
 - 50m down the Terrace and
 - Down Kings Road to the corner of Queens Road.
- The unrestricted parking in Kings Road E includes a 50m length of unrestricted parking alongside the Marist School grounds, but parking isn't possible in this location.

j. The Transport Statement doesn't comply with NP/SV1, NP/SV1.2 or IF2.3f.

The study concludes that the extra traffic generated by the site is sufficiently small as not to make any significant difference to traffic volumes, and this may be right. However, the issue here is not traffic volumes but traffic flows. On-street parking in the High Street and Kings Road effectively reduces them both to one way working, but in an uncontrolled manner. This, together with driver impatience, impedes traffic flows and often causes congestion and gridlock, including at the High Street / Kings Road junction.

This impact is particularly severe during the morning when a number of events come together:

- Peak Traffic volumes.
- At least 3 HGV deliveries and one LGV delivery.
- The school drop-off to St Michael's and the Marist.
- Store visits associated linked to the school drop-off.

During this period the junction is very busy with vehicles and vulnerable pedestrians. Queues regularly form down Sunninghill Road from the pinch point to the Kings Road Junction and west along Kings Road to the High Street.

The Transport Statement doesn't examine either the current congestion or the cumulative impact on this congestion from all the above interactions on traffic flows, congestion and the safety of vulnerable road users, as required by NP/SV1.3 and IF2.3f. Nor does it examine the impact on air pollution and noise as also required by IF2.3f.

On site conflicts between HGV deliveries and visitor parking movements risk exacerbating this situation.

Paragraph 111 of the NPPF (2021) states that developments should only be prevented or refused on highway grounds if there would be an unacceptable impact on Highway safety, or the residual impacts on the road network would be severe. Our parish council believes the proposals will result in an unacceptable risk to Highway and pedestrian safety and may well result in an unacceptable impact on congestion and traffic flows. The Transport Statement hasn't demonstrated otherwise.

k. Other Concerns:

The swept path analyses for an 11m pantechnicon and a refuse vehicle are shown on Drawings 21.126-001 and 002 of the Transport Statement. Both show that it is necessary for the vehicles to drive approx. 11m into the Residential Parking area before reversing into the delivery bay, which poses an unacceptable risk.

The 11m long pantechnicon swept path is also very close to both the residential and retail parking bays, leaving no room for error. The 12m HGVs may struggle to avoid them.

Both the analyses show the vehicles entering from the north but don't show either of them entering from the south or leaving in either direction. No sightlines are shown but when exiting onto the Sunninghill Road the sightline to the north looks sub-standard.

There is no pedestrian crossing from either the SW to NE side of Kings Road or from the W to E side of Sunninghill Road, making access to the store unsafe.

Our experience is that convenience store shoppers are reluctant to walk more than 50m to the store and will park in Sunninghill Road or Kings Road adjacent to the site, thus impeding traffic flows.

The developer hasn't demonstrated how his design has addressed the Council's 4 strategic Themes, contrary to BWDG Principle 3.1 and in particular, putting people first.

The landscaping and Ecology Masterplan shows that the only access to the food store from the car parking is a 1.2 m wide pavement by a busy road, clearly a safety hazard

I. In Summary:

The proposal fails to comply with many NP and LP policies and supplementary planning documents and must be refused,

The bulk, scale and contemporary design of the development would be completely out of character with its surroundings and would be detrimental to the street scene, the setting of the Cordes Hall and to important views of the trees to the North.

The convenience store is unnecessary, and its location would add to the congestion at this already busy junction, with associated noise, pollution and safety risks.

Cllr. Peter Deason
Vice Chair of Planning,
For and on behalf of Sunninghill and Ascot Parish Council.

25th June 2022.

APPENDIX A: CHARACTER OF AREA CLOSE TO THE SITE:



View from Sunninghill Road towards Cordes Hall.



View from High Street towards Cordes Hall.



View from Sunninghill Road / Kings Road Junction towards Cordes Hall.



View from the development across the Sunninghill Road



View from Sunninghill Road towards the new development and Kings Road.



View of the S side of Kings Road looking towards the Cordes Hall



View of St Michael's
School from the High

APPENDIX B. APPROX VIEWS BLOCKED BY DEVELOPMENT

