

## **Ascot Green West Planning Application 22/01971**

### **Sunninghill and Ascot Parish Council Response to the consultation on the amended application (December 2022) as sent to RBWM Planning Dept, 13 January 2023**

#### **1. Introduction**

Following feedback from the consultation on the Ascot Green West Planning Application 22/01971, which was submitted in July 22, the applicant has submitted a number of amended documents. These have included some positive changes, but our main concerns have not been addressed or have only been partially addressed.

This document, which was unanimously approved at the Parish Council Meeting of 10 January 2023, sets out our ongoing areas of concern on the amended proposals.

#### **2. Preamble**

In this section we summarise our primary concerns re the amended proposals.

##### **Overdevelopment of the site**

Overdevelopment of the site was a consistent concern in the community responses to the first consultation, including ours.

The AL16 site proforma allocates approximately 300 residential units and 900 sqm of office space to the whole AL16 site.

- 133 residential units are proposed for this site, or 44% of the total allocation, yet the site is the smallest of the 3 primary sites. On a pro-rata basis relative to the size of the sites the housing allocation would be 66. In the 2018 Ascot Centre Rejuvenation Development Brief the number of dwellings agreed for this site was 99.

We conclude that the number of dwellings should not exceed 99.

- 1259 sqm of offices are also proposed, or 40% above the allocation for the whole AL16 site.

Overall, the proposed retail/commercial space is 2258 sqm, a very significant and unacceptable increase over the current High Street offerings.

The number of dwellings and office space is justified by arguing that the proforma figures are approximate, with no fixed maximums or minimums. Surely the word 'Approximate' sets close boundaries?

- It is also argued that the duty in the NPPF is to make effective use of land remains. It does, but paragraph 119 qualifies this:

*'Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions'.*

We don't consider the residential units ensure safe and healthy living conditions, for the reasons presented below.

**a. Commercial impact:**

The 5 proposed retail units are located in Block 1 (unit A 188 sqm and unit B 180sqm) and Block B (unit C 99 sqm, unit D 232 sqm and unit E 297 sqm). These are all large units, unsuited to small independents favoured by the community.

The proposal is for 629 sqm of the ground floor retail and all 1200 sqm of other commercial to be located in Block 2. The focus is on the food and beverage sectors, and other 'like-minded' businesses, to cater for the 600,000 visitors to the 25 race days and other events each year and to provide additional facilities that will attract visitors and enhance the visitor economy (paragraphs 6.46 and 6.50, Section 6 of the APS). There is only scant reference to the possibility of space for small independent retailers or micro / small business units on the upper floors of Block 2.

This is at total conflict with the principles of Placemaking and with the community vision for Ascot as set out in the AS&S NP and the Prince's Foundation Report, which was to:

- Provide a two-sided High Street to improve the range of retail offerings on the High Street for local residents, with an emphasis on units for small independents.
- Create a village square where the community can gather for relaxation, events and small street markets, and a flexible community arts space.

The proposals are of particular concern because all the commercial space falls into use category E, which embraces a wide range of use that can be changed freely within this class. We understand the site will remain in the ownership of the developer, who will have sole control over the commercial uses.

**b. Residential impact:**

The high number of residential units is achieved by delivering a high % of apartments (75%), 46% of which are in the southern residential area.

In the southern residential area there are 28 apartments and 32 houses. This high density results in homes of poor internal and external quality/amenity and which are out of character with the local area and the proposals in the Neighbourhood Plan and Prince's Foundation Report.

Most of our concerns re the residential provision stem from the high density required to deliver so many homes.

**c. Parking**

Another key concern is the low parking provision. The amended proposal is for 136 parking spaces. This number falls way short of our assessment of the needs, to the detriment of residents, businesses and the surrounding area.

**3. Overview**

- a. The proposals don't deliver the two-sided High Street which is at the heart of the community vision and have deviated significantly from delivering the community benefits.

- b. The proposals represent a serious overdevelopment of both commercial and residential elements of the Site, which impacts on the sustainability and amenity of the proposals. The residential numbers, at 133, are way above the residential allocation appropriate to the share of the AL16, for this 1 of 3 sites and represent significant overdevelopment. In addition, the proposal for 1259 m<sup>2</sup> of office space is more than the 900 m<sup>2</sup> for the whole of the site proforma.
- c. We are concerned that the retail and commercial elements appear to be focussed on providing food and beverage outlets and other leisure facilities for racegoers and other visitors, and don't broaden the range of new retail opportunities in the High Street or provide units suited to small independents.
- d. The parking provision is inadequate. The assumptions made in the assessment of the residential and commercial parking provision are seriously flawed and will impact negatively on the commercial value of the development.
- e. Although the revised proposals for the Community Space and Parish Council office are a significant improvement, there are elements that are unsatisfactory.
- f. The housing mix is very different from that in table 12 of the BLP, and the ratio of apartments to housing (76%: 34%) is inappropriate on this site.
- g. The residential proposals to the south of the mixed-use area don't deliver the larger homes or Townscape character proposed in the Prince's Foundation Report and Project 9.1 on our NP. The terraced form of the dwellings and the high number of flats are not typical of housing in our rural parish.
- h. The density and form of the residential area has severe impacts on the sustainability of the dwellings and the amenity of the occupiers (unit floor space, parking, refuse collection arrangements, cycle storage, EV charging, etc).
- i. Affordable housing is proposed at only 20%, whereas the BLP proforma for the site requires 40%.

## **DISCUSSION**

### **4. Commercial Space**

#### **Two-sided High Street**

- The proposals don't deliver the 2-sided high street, a core element of the Ascot Rejuvenation.
- The new retail is set within the development close to Station Hill and focuses on the food and beverage sectors to take advantage of the trade from the many racegoers who attend the 25 days of racing each year and enhance the visitor economy (APS: Proposed Land Use – Commercial) paragraph 6.50).

This is far from the intent in creating a 2-sided High Street, which was to broaden the range of shopping opportunities for our community in accordance with NP/E3.

The community vision for the Ascot Green development (NP Project 9.1), supported by extensive community consultation, was to develop Ascot into a more attractive place for locals to visit and a focus for the community by providing a community arts space and village square, and enhancing the footfall on the High Street by offering a broader range of new retail.

## **Commercial**

- The 2200 sqm of retail / commercial space is focussed on the food and beverage sector and similar leisure facilities aimed at taking advantage of the 600,000 racegoers who attend the 25 days of racing each year and providing amenities for other visitors to enhance the visitor economy (6.46 and 6.50 page 30 of the Amended Planning Statement (APD)).
- The quantum of this additional retail/commercial space will add significantly to the current retail and commercial space in Ascot but doesn't deliver the broader range of retail offerings proposed in the community vision for Ascot or by NP/E3. Nor is there a firm commitment to providing units for small independent retailers and business start-ups.
- All the retail/commercial space falls under class 3 uses, introduced in 2020. This covers a wide range of uses and these may be varied freely within this class and to other classes (under permitted development rights).

We understand that the development will remain privately owned and if so the total control over what is offered will rest with the site owner alone.

Our Parish Council is concerned that all the commercial space will gravitate to uses even more focussed on serving the Racecourse and other visitors rather than the Ascot Community, as indicated by the proposals for the commercial floorspaces.

This is totally at variance with the community vision, which is focussed on attracting more local shoppers to the High Street and providing a community Arts-space and village square where the community can gather and which will help develop a sense of community. Indeed we fear that the LS proposals will discourage the community from visiting Ascot at weekends.

Our Parish Council urges the planners to find ways to bring the retail offering back in line with NP/E3 and provide a wider retail offering for the local community. To achieve more, smaller retail units are required. Also, that all the non-retail in block 2 is removed. A small amount could be relocated to Block 3, where it would add value to the Community Arts space.

This will bring the commercial 'office' accommodation back in line with the AL16.

Block 2 is a tall and bulky building that dominates the site. The removal of the 'office' accommodation will allow the building to be reconfigured to reduce its height and bulk, bring it more in line with the height of Blocks 1 & 3, and allow the upper storey to be set back.

## **5. Residential**

### **Housing Numbers**

AL 16 shows a site allocation of 300 dwellings for the Ascot Centre site. The amended proposal is for 133 dwellings on the Ascot Green West site, a 34% increase over the 99 proposed in the 2018 Development Brief. The resulting density is 69 dph on the site area minus the area of public open space. The numbers are too high, particularly as the housing is shared with 1258 sqm of offices, 996 sqm of retail, food and drink and 571sqm of civic / community space. Together they result in severe overdevelopment of the site.

133 dwellings represent 44% of the total housing allocation for the whole of AL16 (300), yet the

site area is only 22% of the total AL16 area. This is clearly a mismatch.

The high numbers are justified in paragraphs 6.33-6.41, section 6 of the APS. The main arguments are that:

- AL16 doesn't set a maximum of minimum number.  
This isn't correct. The word 'approximate' sets close limits.
- The duty in the NPPF to make effective use of land remains.  
It does, but paragraph 119 qualifies this with the following statement:  
'Planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, **while safeguarding and improving the environment and ensuring safe and healthy living conditions.**

If the site is allowed to deliver 133 residential dwellings there is a high risk that the other developers will also wish to deliver similar numbers, resulting in over 400 dwellings, way beyond the allocation and the Council's housing need from AL16.

As described below, we consider that the proposals don't ensure safe and healthy living conditions or amenity.

Most of our concerns arise from the high number of houses, and if these were to be reduced to 99 or less many of our concerns would be mitigated.

One suggestion is that apartment blocks 4, 5 and 6 are removed from the terrace that runs down the eastern boundary of the site and they and the houses are replaced by 16 to 18 semi-detached houses with parking between them. This would reduce the number of dwellings by 28 to 30 and allow more spacious dwellings with the parking, cycle racks and refuse to be in site rather than remote from the houses.

We also suggest that the configuration of the Mews dwellings is reviewed. At present they block the openness of the view to the south from the High Street.

### **Size of the Residential Units**

We find that the average size of the 101 apartments is just 8% above the National Minimum Space Standards, 4 of the 32 houses are 5% above and 28 of the 32 houses are typically 41% to 54% above.

Paragraph 6.32 page 35 of the APS states that all dwellings created will benefit from spacious layouts. Many don't. The experience of the pandemic and the trend for home working points to a need for more spacious dwellings.

The small size of the dwellings and poor amenity described below don't deliver the Exemplar Design referred to in QP1c.

### **Residents' amenities**

In commenting on the emerging proposals the pre-app reviews have not sought to reduce the housing numbers. The focus has been on the appearance of the development, and no thought seems to have been given to the wellbeing of residents:

- Many of the apartments are at, or close to, the National Space Requirement and many don't have the benefit of any private communal amenity space.
- Many of the houses are only 4.3 m wide (internal) and have poor natural light.

- The terraces to house types B and B1 overlook neighbouring gardens.
- The rear gardens are accessed via long narrow alleyways.
- Many properties suffer from inadequate parking provision, and for some the only allocated space is up to 50m away.
- Additional unallocated parking spaces for residents and visitors are limited in number and often located well away from the properties being visited.
- Refuse bins are located in the alleyways up to 30m from the properties they serve.

### **Housing Character**

Contrary to BLP policies QP1c. & 4.c, QP3.1b & e, AL16.14, NP/DG1, NP/DG3.1 and 3.2.

Section 9 of the Prince's Foundation Report Defines the Ascot Green Concept. This concept is for Larger Residential Housing in the area to the south of the mixed development. (6.16, page 33 of the APS).

Project 9.1 of the AS&S Neighbourhood Plan envisages that the residential development in Ascot Green should be in keeping with the RBWM Townscape Category "Leafy Residential Suburbs" and / or late 20<sup>th</sup> century suburbs (6.11 page 23 of the APS).

The proposals are for:

- A Terrace of mixed houses and apartments running down the eastern boundary. This includes 28 apartments in 3 blocks, and 18 x 4-bed houses between these blocks. The frontage of each house is just 4.5m.
- A U-shaped mews development, again with Terraced properties. The Mews includes 18 apartments in two blocks and 14 x 4-bed houses.

Together there are 39% more apartments than houses in the residential zone.

The Mews properties impact significantly on the openness of the site and there will be very few trees retained in the area south of the northern return of the Mews block, so the area won't deliver the green and leafy character of Ascot or the leafy residential suburbs envisaged in the NP.

Clearly the proposals don't conform with the PF and NP proposals.

Paragraph 6.15, page 24 of the APS argues that 'the new homes will reflect the characteristics of the area', but no evidence to support this is presented.

### **Housing Mix and Type**

Contrary to BLP Policies HO2.1a and HO2.4, and NP/H2.

The mix of housing is poor and at significant variance with the mix shown Table 12 of the BLP and with Policy HO2.1a.

	1 bed	2 bed	3 bed	4+ bed
Market	5-10%	25-30%	40-45%	20-25%
Affordable	35-40%	25-30%	25-30%	5-10%
All dwellings	15%	30%	35%	20%

The actual mix shown in Section 6, paragraph 6.14 the APS is:

27% 1 bed; 49% 2 bed; 24% 4 bed.

There are no 3-bed homes and all 33 houses have 4 beds.

This mix is not consistent with the intent of NP/H2. There is a significant surfeit of flats (76%) and a dearth of small and medium family homes with gardens in our area, and this site provides an opportunity to redress the balance.

We strongly argue for a more balanced mix and fewer apartments.

## 6. Community Space

### Parish Office

The amended proposals offer 168 sqm and show a possible layout. We have reviewed these proposals and have the following comments:

- The access via a narrow path from the PC parking area is difficult to find for visitors and unsatisfactory for staff, councillors and members of the public attending evening meetings in winter.
- For security reasons we need a reception window.
- The space is too small to accommodate our growing staff, filing, storage, photocopying, facilities for making refreshments etc.
- The large meeting room will mainly be used for evening parish meetings, with some daytime meetings. At other times we wish to be able to rent it out, but this isn't possible as it can only be accessed through the parish council office.

### Community Arts Centre

The amended proposals offer an area of 402 sqm including the first-floor void of 80 sqm. The net floor area is therefore 323 sqm.

We have reviewed the proposals with people familiar with running The Old Court and using the Cordes Hall in Sunninghill. The conclusion of the reviews was that the proposals are not fit for purpose. Reasons include:

- Stage too small.
- Inadequate height above the stage for stage lighting and a cinema screen.
- No clear projection line.
- Poor acoustics.
- No control area at the rear of the theatre for lights, sound and cinema projection.
- Major concerns re noise transfer to the apartments and the parish office.
- Bar much too small
- No spill out area from bar.
- The pedestrian and cycle paths result in an undesirable separation between the arts space and the community piazza.
- Doesn't offer the flexibility of use required to make it sustainable.

## **Piazza**

It was anticipated that the square would be a proper community gathering space and the physical heart to the Ascot Community on the High Street, but what is offered falls far short of this.

Our comments include:

- The Piazza is too small as a community gathering place and for pop up markets, community events, etc., and much smaller than the village square shown in the 2018 Ascot Centre Rejuvenation Development brief.
- The market area isn't included.

The proposals will need further development and the preparation of a business case to ensure that the facility can deliver the community aspirations in a viable and sustainable manner. We will be working with the borough to achieve this but will need to understand the commercial arrangements that will be offered by London Square.

## **Parking**

**Contrary to NP/T1, NP Project 9.1 and the RBWM Parking Strategy 2004.**

### **Overall Parking Provision:**

The parking provision on the site is 136 spaces – 124 residential, 3 car club, 6 commercial and 3 for Parish Council Office.

This is considered totally inadequate and will put unacceptable pressure on the limited on-street parking in the High Street.

TA1.3.6 claims there is enough spare parking capacity within 500m of the site to accommodate any potential increase in demand from the proposed development. The survey details are presented in Section 4.4. of the TA.

We consider the survey is significantly flawed as:

- The parking on Station Hill is fully occupied by commuters during the day and even after 18.30 only has up to 18 free spaces.

As a result of the changes in layout proposed on Station Hill, including the entry to Block 2, the 4 parking spaces to the north of the Fire Station will be lost. Further spaces will be lost going down to towards the station due to the pedestrian refuge and the RBWM/developer recommendation for Station Hill to be double yellow lines/restricted parking along its full length. Therefore, the starting point for the existing users of Ascot is that the development has lost up to 24 spaces. The commuter parking will be forced into the residential streets of S Ascot, which already suffer from commuter parking.

- The Addendum Transport Note (ATN) seeks to show that there are large amounts of spare capacity for parking within 500m of the site. This is strongly rejected by the Parish Council as incorrect or mis-interpreted, as the availability and ownership of the highlighted spaces and even their existence is questioned.

The Sainsburys, Budgens and Hermitage Parade Car parks aren't public car parks and it is likely that the Sainsbury's Car Park will close when the lease expires shortly. The High Street Public Car Park (Owned by the Crown Estate) is scheduled for closure when the Ascot Village site is redeveloped. These spaces should therefore be removed from the assertion.



For the above reasons at least 180 parking spaces must be removed from the off-site availability.

As stated in 9.2.9 of the BLP, *“traffic congestion and a lack of suitable parking is a perceived problem by users of Ascot High Street”* and any reliance on on-street parking for the residents and workers on the site is therefore likely to impact on the viability of the High Street.

4.22 of the ATN refers to the TRBWM ‘Environment and Climate Strategy 2022025’, which states:

*“As a local authority, we will reduce the need for carbon intensive travel by encouraging walking and cycling as well as investing in digital infrastructure. We will create conditions for sustainable travel through the provision of infrastructure such as cycle routes and electric vehicle charging points and minimise air pollution impacts of road traffic by encouraging cleaner vehicles”.*

Neither this statement nor the document’s key actions to reduce transport carbon emissions refer to reducing the number of cars. It is about reducing the number of car journeys and facilitating the switch to EVs.

While the strategy seeks to reduce the number of car journeys it is a fallacy to think that this will reduce car ownership, as argued in 4.23.

### **Residential Parking**

- 4.6 of the Addendum Transport Note (ATN) states that the RBWM Residential Parking Standards requires 147 spaces, based on the maximum standard for areas of good accessibility. However, only 124 spaces are provided (84% of the Maximum Standard). An uplift to this number should be added to reflect the high car ownership in our Parish, which is 1.7 cars per household, which would raise the demand to 166 spaces, and is an appropriate number to require.
- 4.9 of the ATN attempts to justify the shortfall in the residential parking versus the RBWM standards by the proposal to introduce 3 Car Club spaces, on the assertion that each space removes the need for 20 cars. This information is taken from the Car Club association who cannot be regarded as independent and other studies have placed the benefit of a space between 11 and 17. In addition it is highlighted that strict duplication of benefit should not be made and Section 8 of the Surrey CC document “Car clubs in new developments – March 2019” includes a table which advises that for a development site of up to 200 dwellings only 1 car club car would be viable.

One club car will reduce the on-site parking requirement by up to 20 spaces, depending on other factors, so on this basis at least 161 residential parking spaces should be provided, including 15 visitor spaces.

The pre-app advice was for 1.2 spaces per residential unit, or 164 spaces. The 15 visitor spaces are assumed to be on top of this figure, so 179 spaces would be required in total.

- NP Project 9.1 sets out the vision for the Ascot Green Developments and states that any development should include sufficient parking on-site for residents and visitors such that there is no reliance on any on-street parking or the main public car parks.  
NP policy NP/T1.2 reinforces this, as does 9.2.9. of the BLP:

Paragraph 284 of the BLP inspector’s final report states that:

*“However, the 2004 Strategy sets maximum standards and, while MM46 requires some flexibility in their application, their use would be contrary to the Plan’s own*

*intention to move to maximum standards. It would also be contrary to the Government's Statement in March 2015 that the imposition of maximum parking standards led to blocked and congested streets and pavement parking<sup>11</sup>; and that 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".*

For the above reasons we conclude that the on-site residential parking provision should be between 161 and 179 spaces. To these numbers must be added parking for deliveries, service vehicles and tradesmen, in accordance with NP/T1.1.

We conclude that between 170 and 190 residential spaces are needed, compared with the 124 spaces proposed.

It is noted in that the applicant's own Strutt and Parker viability report states:

*"We note that the value of houses is below the average rate per sq. ft locally on the basis that whilst they are new build, they have limited parking and external space compared to many of the comparable developments within the schedule".* This supports the view that the car park provision is below the need.

### **Commercial Parking**

Only 6 unallocated parking spaces are provided for the 2255 sqm of commercial space.

The parking for the 1200 sqm of Business use is 1 space per 100 sqm, or 12 spaces.

The parking for the 997 sqm of retail varies according to the retail type, but assuming an average of 1.5 spaces per 33 sqm, then 45 spaces would be required.

While accepting that some visitors will also visit the High Street it must be appropriate to make some provision for retail visitors, say not less than 20 spaces.

As an absolute minimum we consider 32 commercial spaces should be provided, compared with the 6 spaces proposed.