



SUNNINGDALE PARISH COUNCIL

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Clerk: Ruth Davies

Susan Sharman
Planning Officer
RBWM

1 December 2021

Dear Susan

LATE OBSERVATIONS FOR PANEL BASED ON PLANNING OFFICER REPORT

Application 21/01721/FULL: Sunningdale Park Larch Avenue Ascot SL5 0QE

The redevelopment of part of the Sunningdale Park estate including the erection of new buildings to provide 96 homes (Class C3), conversion of 3x market dwellings to shared ownership in Mackenzie House alongside associated internal access roads, parking, landscaping, footpaths, drainage, provision of 19 hectares of SANG and other associated works.

Sunningdale Parish Council has made repeated representations on the development of Sunningdale Park since the first application 18/00356/7 and at each point has clearly raised all of the following points:

1. Scale and Bulk as it directly affects the Townscape

To confirm, Larch Avenue where this development is proposed is classified as “Villas in a woodland setting” in the extant Neighbourhood plan for Sunningdale, Sunninghill and Ascot. Therefore, any development which does not comply with this townscape is a contravention of the NP/DG2.1 which clearly states:

‘New development should be similar in density, footprint, separation, scale and bulk of the buildings to the density footprint, separation, scale and bulk of buildings in the surrounding area generally and of neighbouring properties in particular unless it can be demonstrated that the proposed development would not harm local character.’

The report prepared for the panel hearing clearly states (1.5) that:

‘The scale of the proposed development compared to the opposite side of Larch Avenue would be noticeably out of keeping with the townscape.’

And continues to inform the panel that:

‘However, this harm would be limited having regard to the approved scheme, where no objection was raised to the impact on the surrounding townscape, and when considering the character of Larch Avenue as a whole.’

Sunningdale Parish Council **objects** to this dismissal of the Townscape and **corrects the statement** that no objection was raised as this is clearly referred to in 2 letters from the Parish Council, 20 April 2018 re 18/00356/7 and 8 July 2021 re 21/01721.

Within the report, you also clearly refer to the 50 letters of Objection, the first point of which is 'Impact on character of the area' and includes numerous references to the contravention of the NP/DG2.1 policy.

As to the actual Bulk and Scale, you refer to the increase in height as 'predominant height' which would appear to be an average of the heights. However, this conveniently removes the extremes and passes over the real impacts.

You state in reference to the 'Crossley Building':

In terms of heights, the proposal ranges from 9.7m to 15.9m, with the predominant height around 13.3m. The approved scheme heights range from 10.9m to 13.9m, with the predominant height around 12.9m.

Therefore, in real terms the building will be taller at the lowest level by 1.2m and taller at the highest level by 2m. So not an insignificant 40cm increase which using the 'predominant height' allows you to record.

2m cannot be classed as an acceptable increase with no impact.

2. Development within the Green belt

The impact of this development in the Green Belt has been detailed in all of the previous representations by the Parish Council and the letters for these are appended to these LATE OBSERVATIONS.

However, on reviewing the report, 11.1 clearly states:

As set out above, the proposal is considered to be inappropriate development within the Green Belt and therefore would only be acceptable if there were very special circumstances to outweigh the harm.

It would appear, however, that the mitigations for this inappropriate development would be:

- **The provision of 96 homes which should be given significant weight**
- **The provision of SANG to provide for the proposed units and 85 additional units supporting housing delivery within the Borough which should be given significant weight.**
- **The extant planning permission which is a realistic fall back and should be given significant weight.**

In justifying inappropriate development in the Green Belt, the NPPF does not give a definitive list of mitigations which class as 'outweighing' the harm, however a general approach would include the following:

- an overall shortfall in housing supply for a particular area

There is no demonstrable need evidenced for this in the application to increase by 22 dwellings over the existing approved application 18/00356.

- local need for residential accommodation of particular types or tenures.

Again, no evidenced nor known need for different residential types for Sunningdale in particular.

- current and emerging Plans do not make adequate provision for particular types and tenures.

If this is the case, where is this highlighted in the report?

- the development would enable some form of infrastructure needed by a community.

No evidence provided nor consultation taken place either by RBWM, the Parish Council nor the Developer

- the proposals make a significant contribution to unmet need.

It is well documented that RBWM need a significant increase in the housing provision, however not at the expense of neighbourhoods and Green Belt.

- the housing proposed meets a specialist need which might release other already constructed housing.

Not evidenced.

- and emerging Local Plans may include proposals to alter the Green Belt and allocate your site for development.

On last review by the Parish Council, the emerging BLP does not include evidence for additions to the scheme and again is not evidenced as such in the report.

3. Provision of SANG

This aspect is reported as a benefit to Sunningdale and the area to mitigate the planning. However, the area of Green Belt with considerably less development than permitted under 18/00356 could be argued to have been more of a benefit.

Should the panel decide to permit this further application for development in the Green Belt based upon the increment to the SANG, the Parish Council would clearly request the firm decision that this would not be increased in further creep through minor amendments and alterations in the future.

The Parish Council once again, **OBJECT to this application**, for all the reasons stated in these LATE OBSERVATIONS and the prior letters and representations to panel.

Yours sincerely

pp. Ruth Davies

Anne-Catherine Buxton
Chairman of Sunningdale Parish Council

The two previous letters are appended in full to these observations.



SUNNINGDALE PARISH COUNCIL

The

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Clerk: Ruth Davies

Jenifer Jackson
Head of Planning
RBWM
Town Hall
Maidenhead

20 April 2018

Dear Jenifer

Please see below the comments from Sunningdale Parish Council in response to the Application **18/00356/FULL** **Redevelopment of Sunningdale Park** including the part demolition, alteration, restoration, conversion and extension of Northcote House (Grade II Listed), Gloucester Stables and the Walled Garden; the alteration, restoration, conversion and extension of North Lodge, the alteration, restoration and conversion of the Gamekeeper's Lodge and Store, and The Dairy; the part demolition and part alteration, restoration and conversion of South Lodge; and the demolition and redevelopment of the Gardeners' Cottages alongside the demolition of other buildings; and the erection of new buildings to provide 177 dwellings (Use Class C3), a care community of 103 units of accommodation incorporating communal facilities (Use Class C2), restoration of the Registered Park and Garden, provision of 13.79 hectares of SANG, plus associated internal access roads, parking, landscaping, footpaths, drainage and other associated works | Sunningdale Park Larch Avenue Ascot SL5 0QE

The comments made below are based upon the information which has been made available to date on this development. Due to the fluctuating number and scope of documents, the Parish Council reserve the right to add further comments as more information is made available.

The proposed development has many aspects that the Parish Council actively supports. These include:

- the opening of the parkland for public access
- the multiple entry and exit points for the public
- the public footpaths throughout the site
- the choice of environmentally sensitive metal fencing surrounding the site
- the modern styling of the Pavilion

However, there are a considerable number of areas where Sunningdale Parish Council has issues with the proposal and therefore wishes to **OBJECT to the application**.

These issues are:

1) Design, mass, height and positioning of the dwellings along Larch Avenue

Sunningdale Parish Council has a real concern about the design, mass, height and positioning of the dwellings along Larch Avenue.

**Development should respond adequately to the local character of the area,
(NPPF paragraph 58 (item4), LP policies H11, GB 2 (B) 1, 2, 3 & 5, NP/DG1.2 and NP/SS8)**

The five buildings of Steuart and Crosley Terraces and Courts within the Larch View complex comprise 84 dwellings. The adjacent MacKenzie House complex adds a further 44 dwellings making a total of 128 dwellings all set in long, large blocks of 3 and 4 storey buildings with the Steuart and Crossley Terraces appearing to be closer to the Larch Avenue boundary than the existing buildings.

NOTE: No detailed figures on the height and exact location for these buildings have been included in the application to date.

The Larch View complex occupies a narrow site facing Larch Avenue on one side -described in the Townscape Assessment as *'Villas in a Woodland setting'*. On the other side is a Grade II registered park and gardens set in the green belt. The Larch View building proposals might be better described as high density, urban development. Sunningdale Parish Council does not believe it is appropriate for the developer to ignore all the existing houses along Larch Avenue, facing the entire length of the development site, when asserting that the character of the area is defined by the style of the existing hotel and conference facility buildings running along one side of Larch Avenue.

NP/DG2.1 makes it very clear: **'New development should be similar in density, footprint, separation, scale and bulk of the buildings to the density footprint, separation, scale and bulk of buildings in the surrounding area generally and of neighbouring properties in particular unless it can be demonstrated that the proposed development would not harm local character.'**

The Crossley and Steuart Court three storey terraces each have a small ground floor outside terraced area-facing towards Larch Avenue - as well as small gardens that are accessed from steps leading upward from their terraces. Given that these gardens will be next to the trees along Larch Avenue, the parish council believe that these gardens and the sunken terraces will have very limited natural light – as will the kitchen, family and dining rooms of the terraced properties. The Parish Council can name multiple sites where similar permitted developments have been followed quickly by numerous applications to either extensively prune or remove trees.

This contravenes **NP/SS8.3 (e)** which states that **'Built footprint should be set back from the boundaries and substantial green landscaping should be included, in keeping with the overall green and leafy character of the area'**

As previously mentioned, little if any information has been submitted by the developer on the actual increase in height of the Larch View and MacKenzie House complex over the existing buildings. **This is a serious omission.**

The 3 storey town houses with underground parking backed by 4 storey apartment buildings will be considerably higher than the current buildings and will therefore dominate the view in comparison to the existing buildings which are lower level and lower density. This increased building height is contrary to saved **LP Policy GB9 (C) 1** which states **'Infilling or complete or partial redevelopment of the designated major developed sites should also not exceed the height of existing buildings'**.

NP/SS8.3 (b) also requires that any redevelopment of the site must **'demonstrate sensitivity towards the landscape, historical and visual value and curtilage of Northcote House and the Registered Park and Garden'**

Sunningdale Parish Council, as well as the inhabitants of the village who have given us their comments, believe that the proposed Larch View design will resemble a townscape characteristic of a Science Park or modern University Accommodation.

It is extremely concerning that this proposed industrial style, multi storey complex can in any way be considered appropriate in a Grade II registered park and garden in the heart of a village where the predominant townscape description of the dwellings facing the complex is *'Villas in a Woodland setting'*. It appears very strange and completely at odds with the criteria for redevelopment set out in **NP/SS8**.

NP/SS8.4 states that any redevelopment must respond to the surrounding green and leafy character. If residential development is proposed, the design should have regard to the Key Characteristics and Description

of RBWM's Townscape Assessment classifications "*Villas in a Woodland Setting*" or "*Leafy Residential Suburbs*".

2) Green Belt

Saved **Local Plan policy GB3** states that there is a general presumption against allowing proposals for **residential development in the green belt**. Similarly, Section 9 of the NPPF stresses the importance of protecting the green belt and that the building of new residential dwellings in the green belt is considered inappropriate.

a) The Walled Garden

The parish council questions how the developer's design vision can include '*The full restoration of the walled garden*' whilst at the same time allow for the construction of 12 new houses within the boundary walls of this garden?

These properties have extensive, walk through, glazed frontages facing the gardens, in effect making these private gardens an extension of the houses themselves. In theory the gardens will be open to the public however they have been reduced in size by two thirds to accommodate the new properties and there is every possibility that the public will feel uncomfortable entering this 'private garden' area.

One cannot see the new householders encouraging the public to walk around the garden and look through their wall to ceiling glazed windows whilst they are having lunch.

The rear gardens of the 6 houses on the South side are very small and the houses on the North side do not have any significant garden at all thus further emphasising the importance of the communal 'public' garden area for the individual householders.

The roofs can also be seen above the wall and have a negative impact on the openness of the green belt. In the Design and Access statement, the concept and vision for the walled garden is stated '*to provide an exceptionally stunning high quality landscaped walled garden which will be open for the members of the public to enjoy*'. However, the 'Development Brief' document entitled 'Diagram of public open space and access' clearly shows that the walled garden is excluded from the 'public open space' area.

The parish council seek confirmation that the walled garden is retained for full public access.

It should not be forgotten that the walled garden is green belt. The proposed 12 new houses do not constitute development that satisfies any of the criteria for development on the green belt and no special circumstances for development have been provided.

b) The Glade

In the 'Glade' area designated for the building of eleven new four bedroomed houses and four new five bedroomed houses contained within their own separate road, the Berkeley Homes Planning Statement (Appendix 1- existing building plan) shows a tennis court, squash court, car park and what has been described as 'contaminated made ground'. This gives the impression that the land has been previously developed.

However, closer examination of Appendix 8.2 (tree survey drawings) and Appendix 8.3 (tree removal drawings) shows that a total of 116 trees are required to be removed to allow for the building of these fifteen houses and their private road. 92 of these trees are designated as either category B1, B2 or C2.

Thirteen of the trees scheduled to be felled are oak trees all of which are between 10 to 15 metres high. One tree scheduled to be felled is a 20metre high Douglas Fir, category B2. There are fourteen sweet chestnut trees up to 24 metres in height- all scheduled for felling. The parish council has concerns about the accuracy of the tree felling appendices as tree number 220 which is 15 metres high is listed under Appendix 8.2 (tree survey) but is not shown on Appendix 8.3 (tree removal plan). The parish council find this hard to understand as it is situated in the pavement area of plot 2 as you enter the Glade Villas road.

If the land is as contaminated as has been inferred by the developers, how can it be so fertile that over 100 trees have successfully grown here and now must be removed to allow for the building works? These trees are in a prominent position in an elevated position on the corner/ side of the site. They are not hidden from the public's view.

Much of the Glade Villas area is green belt, it has not been previously developed, it remains green belt and the construction of luxury homes for private occupation does not qualify as an exception for building on the green belt.

Removal of trees to allow for this Glade Villas development is contrary to **NP/EN2**.

3) Trees

All trees on the site are covered by TPO (015/2017)

The two tree appendices (tree survey:8.2 and tree removal :8.3) detail the trees affected by the building developments. They do not survey woodland areas unaffected by the development.

The proposed building works throughout the entire site will necessitate a total of 362 trees to be felled of which 307 trees are Category B or C. Just 55 trees designated for felling are category U.

More detailed study of the 'reasons stated for tree removal' show that a total of 227 trees are listed on the application as being felled 'solely for development', a heading which is then subdivided into three main sections:

- The trees are removed for (a) development,
- (b) proximity to a driveway or
- (c) proximity to a building

The parish council believe this is a totally unacceptably high number of TPO trees to be removed on such an historic site.

The following are overall concerns about the trees:

- a) 20 Oak trees are planned to be felled- all of which are classified '*for development*'-so they are being removed solely to make way for the new buildings.
- b) 18 of the trees scheduled to be felled are between 20 to 25 meters in height and include: Douglas Fir, Sweet chestnut, Corsican Pine, Larch and Scots Pine. These might better be described as specimen trees where every effort should be made to retain them.
- c) There is extensive felling of 110 + trees in the Glade Villas area, much of which is in the green belt. This has been outlined above.
- d) Other areas of the site where tree felling is extensive. Two of these areas are In the vicinity of the main apartment buildings: Park villas and Woodland courtyards.

There are also specific trees designated for felling which are extremely difficult to justify given the design brief.

- a) T633 is a Sweet chestnut, on its own on the north east boundary: The proposed action for this 25-metre tall, Category B tree is to: *'cut it down to ground level to manage it as coppice stool.'* Why would you reduce a 25 metre Category B tree down to the height of a coppice stool? No reason is stated.
- b) T379 – T382, are four Red Cedar trees. They are all category B2 and all four trees are between 13 to 18 meters high. But, they are positioned on the South front corner of the planned Audley development - Woodland Courtyard. Rather than adapting the development to ensure these Red Cedar trees could remain the developers have opted for removal.
- c) T142 is a Corsican Pine, Category B1, 20 meters high that is situated at the rear of Larch View. So, this is one of the tallest trees on the site, it is the highest category tree on the site and would be classified as a very significant specimen. However, in the developers view the building would appear to have taken priority and felling is planned.
- d) T49- T50, are two oak trees, 6 and 14 meters high, Category C, that are positioned either side of the main entrance to Lark View- on the boundary with Larch Avenue. Their positioning does not appear to have been architecturally agreeable for the re designed front entrance, so they are to be felled.
- e) G11 are a group of trees listed on the appendices as being designated for felling. One might normally expect an independent arboricultural expert to classify a 'group of trees' together if they are either the same type of tree or they are small in number or not very high. It was a surprise to the parish council to see that this G11 Group of trees are in fact a group of twenty three beech and sweet chestnut trees. They are all 14 meters high, category C trees. Whilst the arboricultural company might have classified them as Category C trees it is a concern to note that they are all sited in the area designated for building just South West of the Audley development, Woodland Courtyard, Block D.

4) Number of Dwellings

The number of dwellings proposed for the site in the Local Plan was approximately 230.

The current application now totals approximately 290 dwellings which is an increase of 26% over the projected number of dwellings currently published in the Local Plan. **This conflicts with emerging Local Plan, Appendix D, HA34.**

A single figure percentage increase might have been more appropriate, but this percentage increase makes the Local Plan redundant before it has been officially published.

The parish council requests that this increase be justified?

5) Infrastructure/ roads

Sunningdale Parish Council robustly question the accuracy of the traffic impact assessment survey which concluded that there would be a 0.2% decrease in traffic with the proposed Sunningdale Park development.

The survey was completed after the site ceased to fully function as a Civil Service College. Without exception every Sunningdale resident who has seen this statistic has expressed disbelief. There can be absolutely no doubt that the traffic assessment is woefully inadequate.

The existing road infrastructure, especially in the Silwood Road area, cannot support this development. The railway station is 2.4 kilometres away. The 2011 census for car ownership in Sunningdale (NP/ T1) stated there were an average of 1.66 cars per household in the village. On this basis a development of 290 dwellings would indicate an additional 481 cars because of Sunningdale Park.

The parish council believe there will be major problems in Silwood Road, Station Road and Rise Road.

6) Parking

The parish council also express serious concerns regarding the parking provision on site which is substantiated in the Granville report.

- a) Visitor spaces for Audley and Berkeley
 - i) Only 17 spaces are allocated for Audley for 103 dwellings.
 - ii) Only 25 spaces are allocated for Berkeley for a total of 187 dwellings
- b) Audley staff allocation
 - i) there are only 10 spaces for Audley staff when Audley policy states there are 60 to 70 full time equivalent (FTE) staff at each of their facilities and that there are 40 FTE staff on site at any one time.
- c) Parking for parkland
 - i) Parking spaces for the public visiting the parkland is also very inadequate. There is a small provision of 9 spaces at South Lodge. **NP/T1 states that 'parking should be adequate for social visitors as well as residents and workers, and there should be no reliance on parking on existing streets'.**

7) Medical and School infrastructure

The residents of Sunningdale have expressed grave concerns about the impact of this development on the capacity of our village medical and school facilities. It must be incumbent on the developer to address this when proposing such a substantial development situated in the heart of the village. Yet, the parish council fails to see a real reference to schooling or medical provision in the application. It is also unclear how the medical facilities being provided by Audley benefit the residents of Sunningdale.

8) Affordable Housing

Referring to Berkeley's affordable housing statement (March 2018) the justification for the number of affordable houses is predicated on the use of a vacant building credit. The parish council is unclear how this can be true. The understanding is that this can only be justified for brown field development sites containing vacant buildings which do not believe applies to this site.

Policy HO3 from the emerging Local plan defines the minimum requirements for affordable housing. The current proposal for 22 affordable housing units at Sunningdale Park fails to conform to this policy.

9) Conclusion

Berkeley and Audley have endeavoured to give the impression that this is a thoughtful, appealing design proposal that is harmonious in its surroundings. In reality, this must be balanced against the actual facts that can be uncovered within the application.

These include:

- the 26% increase in the number of dwellings than the number proposed in the Local Plan,
- the loss of 362 trees on one site in the centre of Sunningdale
- the overly tall industrial styled Larch View apartment blocks positioned closer to the road than the current building,
- the new Glade Villas and road built on the green belt necessitating 100 + trees to be felled
- a travel survey that maintains a 0.2% reduction in traffic flows
- the apparent '*change of use*' to accommodate 15 houses within the walled garden

- desperate underestimate of projected vehicle movements
- insufficient visitor parking

Sunningdale Parish Council request that this application is refused.

Yours sincerely

Sunningdale Parish Council



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Clerk: Ruth Davies

Susan Sharman
Planning Officer
RBWM

8 July 2021

Dear Susan

Application 21/01721/FULL: Sunningdale Park Larch Avenue Ascot SL5 0QE

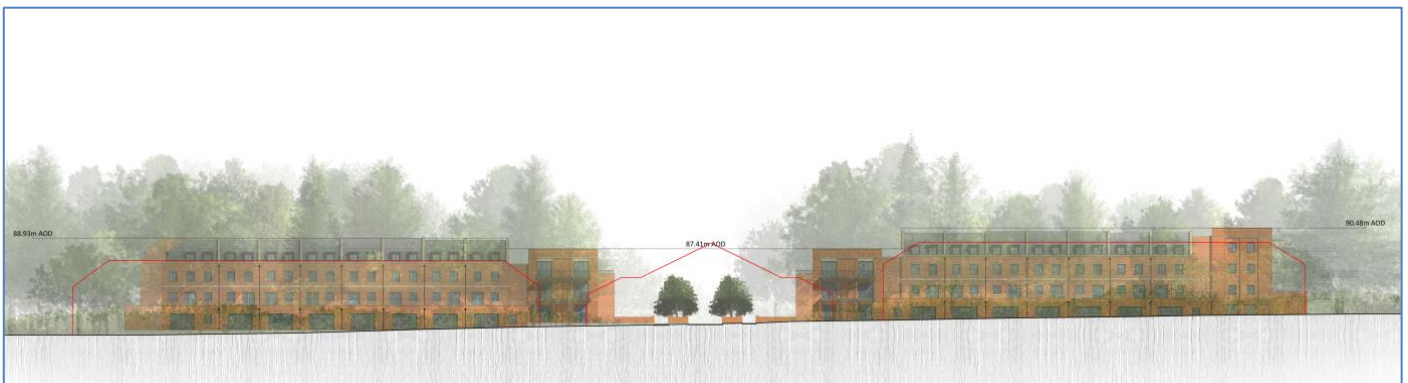
The redevelopment of part of the Sunningdale Park estate including the erection of new buildings to provide 96 homes (Class C3), conversion of 3x market dwellings to shared ownership in Mackenzie House alongside associated internal access roads, parking, landscaping, footpaths, drainage, provision of 19 hectares of SANG and other associated works.

The Planning Committee considered this application at its meeting on 7 July 2021. We would like to thank Berkeley Homes for their presentation and responding to questions from the Parish Council and residents.

However, there remain a number of issues and concerns related to this application. These reference back to the approved scheme 18/00356.

Scale and Bulk

The street scene for the approved scheme for Crosley and Steuart (shown below), although described as '*repetitive and symmetrical*' in the Design and Access Statement, does blend in as a single ridge height behind the trees along Larch Avenue and screens the development to a certain extent.



Steuart and Crosley- approved scheme- street view from Larch Avenue

However, in the proposed scheme, the developer has now introduced large sections at the corners which are significantly higher than the approved scheme. This increases the overall bulk of the building.



Crossley – proposed Northern elevation



**Steuart-
proposed Southern view** - note that the trees are indicative. They are much further away but have been drawn to look closer to disguise the bulk and height of the building.

One of the Parish Council's main concerns is the change to Crosley Court and the view of the apartment block from Larch Avenue. The developer might take note of the description of this block in the letters received from local residents objecting to the scheme. These include: *'Equivalent to a 19th century army barracks'*, *'student halls of residence'* and *'Pentonville Parade'*.

A four- storey monolithic structure like this does not sit comfortably opposite the houses in Larch Avenue where the Townscape is described as *'Villas in a Woodland Setting.'*



Crosley- Proposed Western elevation – as seen from Larch Avenue -shown above

The proposed development is therefore contrary to policies NP/DG1, NP/DG2 and NP/DG3 of the Neighbourhood Plan which states that new development should respond positively to the local townscape. New development should also be similar in density, footprint, separation, scale and bulk of the buildings in the surrounding area.

We would argue that this added bulk at the corners adds significantly to the perception of scale which would be contrary to policy NP/DG2.

Questions about the actual height of the highest structures within the development were answered by Berkeley at the planning meeting as *'a bit higher than the approved scheme.'* Subsequently Berkeley accept that Crosley Court is taller than the approved scheme in places by c.3m.

Inappropriate Architectural Style and Layout

This application proposes architectural changes to Crosley and Steuart Court which are significantly different to the architectural style of the approved scheme. The three pictures below show the architecture of the approved scheme with respect to these blocks.



Approved Scheme - View 1



Approved Scheme - View 2



Approved Scheme - View 3

The layout of the approved scheme is shown below.



Approved Scheme (2019)

The developers have used a Collegiate theme as their new architectural link to distance themselves from the previously approved design. Now there are references to *Scholars Row*, *Crosley Classrooms* and *The Great Hall* in the Design and Access statements to reflect this new scholarly theme.

Additionally, the developer has used photographs of existing architecture in the Design and Access statements as reference points for the design of the proposed new buildings at Sunningdale Park. Examples of these are shown below for Crosley Hall and The Chapel. However, in every instance the architect has selected urban examples as the reference photographs. These are large, multi-storey urban buildings. However, it should be noted the environment where the buildings are to be located. Sunningdale is a village. It is not a town and it is not a city centre. Hence, the style, scale, size and bulk of the proposed buildings would probably not be out of place in a city centre but they are not appropriate for a village.

Crosley Hall

Crosley Hall is very similar in architectural style as the Great Hall, however introduces gables, buff brick and large openings with deep reveals, which, coupled with the stone detailing and rendered plinths, creates a stronger and deliberate entrance into the building which is accessed from Park Avenue. This will make the journey for its residents more legible which is emphasised by the use of signage.



The Chapel

The Chapel takes inspiration from traditional chapel buildings including the Salisbury Chapel shown within the precedent images. For this building focus has been given to the scale of the openings with deep reveals creating opportunities for private amenity space for the apartments. In addition, the building will have a clipped verge and eaves roofs similar to that of the precedent image.

The building will be predominately red brick with stone detailing and blue snapped headers.



Proposed Eastern Elevation - Bay Study [1:100]



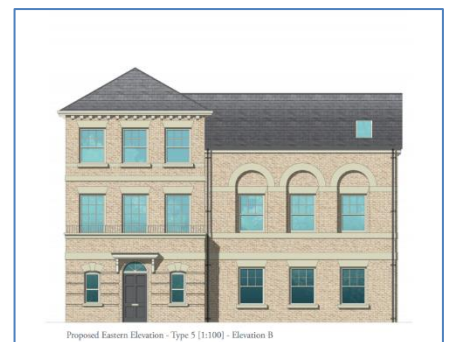
Precedent Images

The NPPF Section 12. paragraph 127 states:

- developments should be visually attractive as a result of good architecture, layout and appropriate and effective landscaping.
- they should be sympathetic to local character and history, including the surrounding built environment and landscape setting.

The Parish Council believe that in selecting this urban reference point the developers are contrary to the NPPF Section 12.

The sheer scale, bulk and height of the proposed changes can be seen in the illustrations below. These also now include the introduction of a wide variety of architectural features.



The layout out and positioning of these build elements has also changed as shown below. Continuing the urban theme, the positioning of the Crosley buildings in a square is more concentrated with less open views than on the approved scheme.

The Southern flank of The Crosley Great Hall also appears to be dangerously close to a TPO tree as can be seen in the diagram below. It is difficult to see how the RPA of this tree will not be compromised. It is noted that no additional tree works are envisaged with this latest proposal.



The Parish

juxtaposition of architectural styles together with the size, scale and bulk does not represent “Good Quality Design” as defined in policy NP/DG3 in the Ascot, Sunninghill and Sunningdale Neighbourhood Plan.

Council believe that this

Green Belt

The Sunningdale Park estate lies entirely within the Green Belt.

Paragraphs 145 and 146 of the NPPF states that “*certain developments are permitted within the Green Belt*” but they should not cause substantial harm to the openness of the Green Belt. The Parish Council would argue that the revised design of the Crosley building together with the new building style centred around a square as well as the extension of The Great (Crosley) Hall further into the existing green space and undeveloped area of the site does affect the openness of the Green Belt and is therefore contrary to paragraphs 145 and 146 of the NPPF.

Local Plan

The developers refer to The Local Plan as a key reference document but when focusing their attention on maximising the number of dwellings on the site the Local Plan tends to recede into the background. Sunningdale Park was allocated 230 homes under The Local Plan. Planning permission was approved for 168 homes (Class C3) and 103 units of accommodation (Class C2) for the Care Community (Audley). A total of 271 dwellings.

Under the approved 18/00356 scheme there was a total of 74 homes approved for Crosley and Steuart.

Under this new proposal a further 22 homes are being added bringing the total to 96 homes in Crosley and Steuart, an increase of 30%. Town houses have been replaced by flats. One bedroom apartments have increased from zero to 10 and two bedroom apartments have increased from 37 to 49.

The total number of dwellings on the entire Sunningdale park site is now proposed to be 293.

Parking Provision

As quoted in the Neighbourhood Plan “*It is however a recognised reality that an affluent, non-urban neighbourhood like ours will continue to have a high level of car ownership. This is aggravated by the limited routes and low frequency of bus services in our area, especially the lack of buses during the peak morning and evening periods.*”

Evidence shows that we have a higher level of car ownership per household (1.66) than the average in our Borough (1.50), which already has a high level of car ownership by national standards”.

Given its location, Sunningdale Park is not a sustainable location close to major transport hubs. There are no buses and it is a 1.1 mile walk to Sunningdale Railway Station that takes 24 minutes. Town planners consider that the most people will walk is only 10 minutes otherwise they will drive.

It is questionable whether there is adequate parking for this density of development.

In the latest plans only 7 spaces are provided for visitors and trades people for a total of 96 apartments (up from 74 in the extant permission). This is inadequate. We also note that there are 34 private parking spaces allocated for Scholars Row but just 161 spaces allocated for the entire Crosley and Steuart blocks. This excludes the 7 visitor places.

There is a risk that unless these spaces are increased there will be reliance on on-street parking and additional pressures placed on the already inadequate parking in Larch Avenue. Berkeley Homes argue that a further 14 visitor parking spaces will be provided by the Gardeners Cottages, but these are being provided for visitors to the larger SANG at Sunningdale Park and should not be used by residents of Sunningdale Park.

This is contrary to Neighbourhood Plan policy NP/T1.

Traffic and Access

The additional traffic along Larch Avenue and Silwood Road resulting from the development of Sunningdale Park continues to be of major concern to residents. The residents of Larch Avenue still understandably believe that the impact of traffic along these roads was not given sufficient consideration when application 18/00356 was approved. It is hard to comprehend how the introduction of 271 new dwellings could have resulted in a 2.2% reduction in traffic.

Adding more apartments will naturally increase the need not just for parking but also an additional number of trips made by these cars.

It is essential that a sound infrastructure plan is put in place to fully consider the infrastructure changes needed to this area to support this development. Today, Silwood Road is already a traffic bottleneck and some serious work needs to be done to mitigate the increased traffic using this road.

We would like to see an updated traffic report and plan of action from RBWM to address our concerns with respect to traffic along these two roads.

It might be argued that Berkeley Homes would willingly add more dwellings on the site with little concern for supporting infrastructure. They do however accept that Silwood Road will be a problem. The Transport statement, section 3.3, states that Silwood Road has on-street parking outside various retail units and that ***'This parking reduces the carriageway width to between 3.2m and 3.5m and therefore to only one way operation. There are, however, spaces between the groups of parking bays which provide regular passing places but this reduction in width is likely to cause delays.'***

A329 London Road / B383 Buckhurst Road / B383 Silwood Road junction

The Parish Council is concerned about the build-up of traffic at the London Road/ Silwood Road junction. Berkeley Homes reference this in their Transport statement, Section 2.36. *In the vicinity of the site, the RBWM INFRASTRUCTURE DELIVERY PLAN – CONSULTATION VERSION (2019)(IDP) indicates that **improvements have been identified at the A329 London Road / B383 Buckhurst Road / B383 Silwood Road junction (A27)**. This is currently a staggered T-junction around 215m north of the northern corner of Sunningdale Park. The IDP refers to a 'roundabout'*

and so there may be consideration to upgrade this junction into a roundabout but no further details have been identified. This scheme has, however, a low priority within the Emerging Local Plan.

Hence, Berkeley Homes have used this 'low priority' reference in the Emerging Local Plan to distance themselves from making any changes at this critical junction. However, the Parish Council would argue that increasing the number of dwellings from the originally planned 230 to the currently proposed 293 does make a significant change to the priority of this junction. We would argue that the proposed increase in the number of dwellings at Crosley and Steuart should be conditional on Berkeley Homes funding a new roundabout at this junction. Failure to do this is likely to result in increased traffic at this junction requiring the subsequent introduction of a roundabout but then the roundabout would have to be funded solely by RBWM.

Highways

There has been a recent change of road layout at the junction of Larch Avenue and Silwood Road which is already causing problems. We request that the Highways Department of RBWM urgently carry out a site visit, review these changes and report back on the narrowing of Larch Avenue on such a critical junction. This change has exacerbated problems with a junction which is already problematic.

Mackenzie House

The Parish Council is concerned about the treatment of Mackenzie House in this application. It has largely been ignored. The extant planning permission for Sunningdale Park secured the delivery of 38 high quality shared ownership apartments in Mackenzie House.

However, it is understood that other significant aspects of Sunningdale Park such as The Glade, The Pavilion, The Dairy, The Walled Garden and The Gardeners Cottages remain as proposed in the approved scheme unless a subsequently approved variation has resulted in a design change – such as with the Gardeners Cottages.

This comprehensive complete re-design and the new proposed Collegiate architectural approach for Crosley and Steuart has obviously taken some time and considerable resources. Mackenzie House is positioned in a prominent position on Larch Avenue. Yet, in this proposed application Berkeley Homes state that: ***'should this application be approved, Berkeley are committed to reviewing the architectural proposals for Mackenzie House to more closely align with the revised architecture proposed in Phase 1'***

The Parish Council finds this **unacceptable** to make this review 'conditional'.

One conclusion from this statement is that Berkeley Homes are prepared to allocate very significant resources to redesigning the Crosley and Steuart buildings and now all parties have to review a half-completed planning proposal. We are being asked to approve The Crosley and Steuart Buildings and then if that is approved by RBWM, Berkeley will present us with the plans for Mackenzie House.

The Parish Council **strongly requests that RBWM insist that any redesign of Mackenzie House be included under 21/01721**. Then the proposed architectural treatment of this important area of the site along Larch Avenue can be viewed in its entirety rather than on a piecemeal basis.

We ask that you **Refuse** this application.

Yours sincerely

Yvonne Jacklin and Michael Burn
Co Chairmen of the Planning Committee.

