

EK/4772/01(09Feb17)WestminsterCC

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Dear Sir / Madam

**PLANNING APPLICATION 16/10952/COFUL : BEACHCROFT HOUSE, SHIRLAND ROAD, LONDON
OBJECTION ON BEHALF OF DELAWARE MANSIONS LIMITED**

We act on behalf of Delaware Mansions Limited who wish to object to the above application. Please note that our client has also instructed Motion to critically review the submitted Transport Assessment and their comments are included in the attached Technical Note (dated 06/02/17).

We do not intend to comment on every aspect of the application, instead we wish to raise some significant concerns with the current proposal. Our client does not object to the principle of the development however they are concerned that the density and scale of development, coupled with the lack of parking, will result in an adverse impact on the local area.

The attached Technical Note prepared by Motion concludes that the proposals cannot be accommodated without resulting in detriment to the operating capacity of the local transport network and as such should be refused. A summary of the key concerns are set out below for ease of reference:

- *“The PRP Transport Assessment has underestimated the trip generating potential of the development suggesting a net change of 49 additional two-way trips, it has been determined that the development is likely to result in an additional 123 trips on weekdays and 150 additional trips on Saturdays. The impacts of this need to be clearly understood including an assessment of the likely increase in parking demand.*”

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- *The applicant proposes a parking provision below the likely level of demand and as such the development is likely to result in overspill parking onto the surrounding streets. Furthermore, it is proposed within the Transport Assessment that should the demand for disabled spaces exceed the supply then residents should apply for residential white badge (disabled) parking permits for the local controlled parking zone (CPZ). Given the applicant is proposing less than the minimum number of disabled spaces required it is considered that a demand greater than the number of spaces is highly likely.*
- *Parking beat surveys have been undertaken and demonstrate that parking in the vicinity is operating close to capacity and subsequently the local streets would be unlikely to accommodate the additional demand without detriment to existing residents.”*

We note that the Local Plan Policy TRANS 23 clearly states that the City Council will normally consider there to be a “serious deficiency where additional demand would result in 80% or more of available legal on-street parking places being occupied”. Furthermore, it also confirms that “In these circumstances, the City Council will normally seek to resist development unless the potential impact of additional cars being parked on-street in the vicinity is mitigated”. Our client is concerned that there is already a serious deficiency in on street parking, the proposals will clearly exacerbate this to a further unacceptable level and no mitigation has been put forward by the applicant. Given these significant concerns, and the latest on street parking stress survey, we would respectfully request that this new evidence is reviewed in detail by Westminster City Council Highways Team before the application is determined.

We have also reviewed the submitted ‘Planning and Affordable Housing Statement’ prepared by PRP and note this includes an assessment of the proposals against the development plan which consists of The London Plan and Westminster’s Adopted City Plan (2016) and ‘Saved’ Policies from the Unitary Development Plan. It also includes an assessment against the National Planning Policy Framework (NPPF).

The NPPF sets out the ‘core planning principles’ which should underpin decision making and this confirms that planning should (inter alia) “always seek to secure high quality design and good standard of amenity for all existing and future occupants”. Furthermore in respect of design, the Government sets out its commitment to ensuring that developments should optimise the potential of a site to accommodate development (including the incorporation of green and other public space) and support local facilities and transport networks. It also confirms that developments should ensure they respond to local character (paragraph 58).

It is acknowledged that the existing buildings on site have no architectural merit and fail to contribute towards the character of the area. However any redevelopment of needs to ensure that secures a high standard of design, responds to local character, as well as meeting the needs and requirements of

future residents in terms of amenity and parking. Our client is concerned that the development fails to achieve this given the scale and density of development being proposed.

PRP provide a very brief assessment of ‘Density’ (page 14 of the Planning and Affordable Housing Statement). They correctly refer to the London Plan Density Matrix, which relates to location and public transport accessibility location (PTAL). Policy 3.4 of the London Plan refers to ‘optimising housing potential’ and confirms:

“Taking into account local context and character, the design principles in Chapter 7 and public transport capacity, development should optimise housing output for different types of location within the relevant density range shown in Table 3.2. Development proposals which compromise this policy should be resisted.”

Setting	Public	Transport	Setting	Public	Transport
	0 to 1		2 to 3	4 to 6	
Urban	150–250 hr/ha		200–450 hr/ha	200–700 hr/ha	
3.8 –4.6 hr/unit	35–65 u/ha		45–120 u/ha	45–185 u/ha	
3.1–3.7 hr/unit	40–80 u/ha		55–145 u/ha	55–225 u/ha	
2.7–3.0 hr/unit	50–95 u/ha		70–170 u/ha	70–260 u/ha	

Extract from The London Plan - Table 3.2 – London Plan Density Matrix

PRP confirms that the site benefits from PTAL rating of 5, however we note the correct PTAL rating is 4. Whilst that is the case, PRP correctly identifies the London Plan density matrix density range of 200 to 700 habitable rooms per hectare for this location. Given the correct PTAL rating of 4 we would normally expect the density of development to be towards the lower end of this range. However PRP simply assert that the overall density of the development (i.e. 570 habitable rooms per hectare) is within this range. PRP fail to acknowledge that the supporting text London Plan 3.4 clearly states that is not appropriate to simply apply these density ranges to all sites and consideration needs to be given other factors including “*local context, design and transport capacity*”.

In terms of local context, we acknowledge that there is some variation in the density of surrounding developments, however the majority of residential properties / developments are set within more generous plots with provision for amenity space, landscaping and, in some cases, parking. PRP’s ‘Proposed Site Plan’ (Ref: AA5302-2003) clearly illustrates the footprint of the new buildings in the context of the surrounding sites. From this it can be seen that the proposed plot ratio / site coverage is far in excess of the surrounding residential sites and coupled with the resulting scale of development we

consider that it will result in an adverse impact on the character of the area and will conflict with the London Plan and NPPF as a result.

We also note that the density and scale of development results in a further impact in terms of the lack of provision of useable amenity space for future residents. We note that PRP do not include any detailed assessment / calculation of the proposed amenity space serving these 31 apartments. Based on the submitted plans (in most cases) provision is very limited in the form of balconies and / or terraces. We note that Saved UDP Policy H10 seeks the provision of 'Gardens and Community Facilities'. This confirms that the City Council will normally expect the provision of amenity space and outside of central locations will normally include the provision of open space. PRP have not assessed the proposals against this policy and we note that the only shared 'open space' serving the 31 apartments is the 'podium garden', which is small, unusable and conflicts with Saved UDP Policy H10 as a result.

We consider that the density of the development in this location is excessive and will result in an adverse impact on the character of the area. Furthermore given the scale and density of development the proposals can only accommodate limited provision of private / shared amenity space for the 31 apartments. Finally the proposals fail to provide sufficient parking provision and will exacerbate an already serious on street deficiency within the local area. In light of this we consider that the application clearly conflicts with the development plan and the NPPF. We respectfully request that application is refused as a result.

Should you require any further information please do not hesitate to contact Ed Kemsley at the above address.

Yours faithfully

PEACOCK AND SMITH
Enc.