

Delaware Mansions Limited
c/o Carringtons 318 Kensal Road London W10 5BZ

Cllr R Robathan
Ward Member for Knightsbridge & Belgravia
City of Westminster
Westminster City Hall
64 Victoria Street
London
SW1E 6QP

14 March 2017

Dear Councillor Robathan

Re: 16/10952/COFUL - 111B Shirland Road London W9 2EL

Many thanks for your letter of the 10th March (received on the 13th).

There are a number of areas where we believe your letter is both factually and legally incorrect.

Traffic Flow

Traffic flows in the Motion Report derived using an industry standard approach have demonstrated that the applicant underestimated the traffic flows assumed to be generated during the weekday and provided no assessment of the trip generation during the weekend period. Given that the existing trip generation from the site is likely to be negligible, it is considered that the change in trip generation resulting from the proposed development could not have been properly assessed. Since there is a direct correlation between trip generation and parking requirement it is imperative that this is assessed in more detail.

Parking

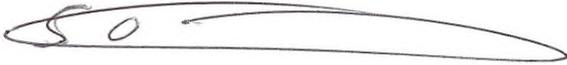
We do not accept the reference to 'parking standards' is misleading, the report prepared by Motion clearly acknowledges that these are maximums. Whilst it is accepted the parking standards are expressed as maximums our concern remains that the applicant proposes parking provision is below the likely level of demand and as such the development is likely to result in overspill parking onto the surrounding streets. We note that Westminster's Highways Planning Manager has advised that "*any loss of existing parking is contrary to policy. Should parking be allocated to Oak Tree House, there is an under-provision of parking for the new residential accommodation.*" Therefore it should be acknowledged that there is an under-provision of parking on this site.

You have not made any reference to the current on-street parking problem, which is clearly evidenced by the survey data submitted (including that carried out by the Council). 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*" and 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*". We consider the evidence is very clear in that there is already a serious deficiency in the locality, the proposals will exacerbate this further and no mitigation is being put forward, as required by the Council's adopted policy.

Consultation

We note the comments on consultation with residents of Delaware Road. We cannot comment on whether that is correct or not however it seems more than coincidental that notices did not appear on Delaware Road until after the objection letters were submitted by Delaware Road residents.

Kind regards

A handwritten signature in black ink, appearing to be 'SO', enclosed within a long, horizontal oval shape.

p.p. Simon O'Connor

Ellie Doohan
Resident and For And On Behalf of Delaware Mansions Limited