**MEADOWS AND PTNRS – TOLWORTH TOWER**

**COMMENTS ON OFFICERS REPORT**

Page and Clause numbers refers to Officers Report

**PAGE A3**

**We have taken the red line area of the site as the Officers Report(OR) at 0.86hectare despite this area not being specifically mentioned in the OR and that the area includes all the development within that area as detailed and listed in the documentation and drawings listed in the OR**

**PAGE A5 - Key Standards Dashboard**

***LP refers to current London Plan***

1. Affordable Housing - 50%(units) required under RBK’s Core Strategy – only a poor 28 % (units) to be provided after financial viability test.
2. No. of Car Parking Spaces - Maximum 196 stated as necessary which is 0.75 parking spaces per car – **Question where did 0.75 figure come from. Not in current London Plan or Core Strategy.**
3. **Wrong could be 261parking spaces under the current London P**lan- 92 Provided - Compliant Yes – **Wrong answer should be No**
4. **[A]** Density maximum 170 (units/ha) 450 (hr/ha) -actual 303 (units/ha) 648 (hr/ha). We will stick to the normal measure which is units/ha.
5. **[B]** Reasons to mitigate the increase in density from 170 to 303:-“*The development plan advises that the matrix should not be applied mechanistically. Officers consider that given that the site is in a highly sustainable location, and is a brownfield site, the proposal is general accordance with the development plan”.* We would have found the truth more acceptable than that load of made up planning jargon. The real reason is simply that the flats are accommodated on 20 floors of a 22 storey office block. Of course its going to be dense.

|  |
| --- |
| 51No Studio x 1 = 51 |
| 130No 2 Bed 3 person x2 = 260  |
| 7No 2 Bed 3 person x 3 = 21 |
| 66No 2 Bed 4 person x 3 = 198  |
| 7No 3 Bed 5 person x 4 = 28 |
| **261No**  Flats Total **558No rooms** – divide by 0.86 = 648 hr/hectare |

**Page A8**

*“And, subject to the applicant entering into a legal agreement to fund the consultation and implementation of a Controlled Parking Zone (if supported) and a prohibition of any residents of the proposed development having access to parking permits, no objections raised”.*

1. We feel this is absolutely essential. It is to be regretted and won’t be liked by local residents of surrounding streets that they will have to pay to protect their roads from overspill from this development(0.35 parking spaces per flat) and the Meyer Home development across the A3(0.37 parking spaces per flat). Both have very low car parking provision and it is inevitable combined with the excessive densification of Tolworth as part of the New Local Plans that there will be excessive and intrusive new on-street parking.
2. Please be aware that the very low on site parking provision for this application was in no small part a “Case Stated” example of the Meyer Homes development. This case stated is of particular concern as this is an existing office tower office block being converted to residential. Any special dispensations in respect of density or parking levels should be made known and treated as a one off and not for all and sundry developers to treat as a Borough wide norm.
3. If developers want to provide these ridiculous and unrealistically low parking provision then they should make it absolutely plain and clear in their tenancy or leasehold agreements that the tenants or leaseholders may end up at some point of time in the future of not being able to park their car on street without some form of active transport, such as a long walk or cycle ride, being involved to acess it. For renters this might not be too bad, depending on the length of the rental agreement, but for leaseholders who bought unaware of this situation it could be financially disastrous when they want to sell. If CPZ were introduced this would necessitate strict enforcement and currently enforcement is not one of this Council’s strong points.
4. We have been through parking surveys south of the A3 for the Meyer Homes development and the Sunray estate residents have proved they are full up and Hook Rise South is so narrow it is totally unsuitable and that’s all the residential roads south of the A3. So all the overspill will target north of the A3 and will initially be to an area bounded by the A3, the Ewell Road and Red Lion Road and probably up Raeburn Avenue and the roads both sides off of that but this could spread out.
5. Much of the case for the very low levels for off-street parking has been predicated on the future arrival of CrossRail 2. Its whole future is now in severe doubt due to the fiasco of CrossRail 1. It will certainly be not finished anywhere near 2033, the latest predicted date for opening, but hopefully CrossRail 1 will be finished by then.
6. The latest news is that due to extended delays to Crossrail 2, conceded by Tfl, it now being considered by them that for a considerable period of years the delay in the delivery(if ever) of Crossrail 2 will be covered by a bus replacement service.

**Page A9**

**Travel Plans**

To mitigate car usage and on street parking Travel Plans should be drawn up and strictly enforced with the plan and Travel Plan Coordinator in place for as long as the Council deem necessary to avoid overspill

**Page A11; Clause 10**

*“Policy CS10 of the Core Strategy 2012 states that the Council will seek to ensure that a broad mix of accommodation options are available to residents and that a range of local housing needs are met”.*

BtR does not fill the requirement either in mix with a gross shortage of family accommodation or in type in that it will all be rented accommodation.

**Page A11 & A12; Clauses 13 – 15**

**Tilted Balance**

1. This is almost being used to blackmail DCC’s into approving applications. It is one of the most perverse and twisted pieces of planning policy yet to be introduced.

**Question:- If we are in tilted balance then what are the causes for the bottleneck that prevent projects coming to DCC adjudication? Not aware of DCC currently turning down too many developments at DCC**

1. **Questions:- Is it shortage of planning personnel as inferred by Malcolm Self at the last full meeting of the Council? Is it developers playing hardball in negotiations and producing development schemes that are based more on delivering substantial profits rather than sustainable communities**? **Is it the GLA involment in checking every major development?**

DON’T BE BROWBEATEN by this ploy when this is inevitably raised there are sufficient shortcomings in this scheme for rejection.

1. A relevant quote from the Money Week Magazine dated 13th Sept 2019:- *The countries house builders are accused of exacerbating the housing crisis by sitting on half a million unused plots of land says the Independent. The top ten firms completed just 86,685 houses last year but have received planning permission on 470,067 plots of land that stand empty.*
2. **Question:- could this be a reason?**

**Page A12 &A13; Clauses 16 - 21**

**Affordable Housing**

All rather confusing but it would appear 10% was initially offered and after a Financial Viability Assessment it has now been raised to **28%.** Don’t be fooled by clause 17 because we are working, planning wise, tothe 2016London Planand the Local 2012 Core Strategy. The New Draft London Plan does not apply as it is still going through its consultation stage. So affordable housing should be as Clause 18 - **50%**

**A13**

**Quality of Accommodation and mix(family housing)**

The Local 2012 Core Strategy states **30%.** What the Council have been offered is 7No 3 bed flats which equate to **2.5%.** Squeezing an extra 21 flats into the development has not helped this situation but the main driver is financial**.** This reinforces our earlier statement that developer led schemes are based on delivering substantial profits rather than sustainable community developments.

**A14 – Clause 26**

It is not in accordance with DM13. For reasons see paragraph above.

We would advise that there is another BtR scheme currently going through Kingston planning at the moment and would quote comments on the rental sector from Money Week magazine 17th May 2019:-

* So American –style corporate landlords are entering a (rental)market with healthy demand
* And it’s a lucrative business. On average, the rent on BtR flats is 11% higher than surrounding rented homes according to an analysis of 25 rental schemes by real estate services firm JLL.
* By 2025 investors will have allocated £75 billion to the professionally managed private-rented sector, says estate agent, Knight Frank.
* Grainger who is the UK’s largest private landlord signed a deal in April with TfL to build 3,000 properties above and around Underground stations.

Bearing in mind our statement on Page A8 item 2 above if the bar is set so low with our 1st BtR scheme, with possibly lots to follow, the future delivery of family homes, affordable housing and on-site parking levels in the Borough looks very bleak.

**Question:- For Kingston Planners:-We would comment that the 78 flats in the north wing seem to have slipped through unnoticed though they do get a cursory mention in this report. Though they were not developed by Meadows they are now in their ownership. What was included/agreed in respect of affordable housing, family housing or amenity space for these flats?**

**A14 – Clause 28; A24 Clause 97**

The Tower accommodation long axis is approximately on an E-W line resulting in the main long elevations facing predominately north or south. The north elevation will get daylight but very little sunlight meaning artificial lighting will be needed to the rooms during most of the winter months. The south elevation is deemed to require special solar glass and blinds to protect occupants during the summer months. The building is approximately 64m long and the central corridor to the flats will be deprived of any meaningful natural light and will require 24/7.

With some 13No flats per floor results in only some 30% of the flats being duel aspect compared with the normal standard maximum permitted flat configuration of 8No flats per floor which would have some 50% duel aspect.

Clause 97:- Officers response to lack of duel aspect flats. *“the applicant has demonstrated that the overall quantum has been kept to a minimum”*. Action by the Applicant; putting one duel aspect flat in each of the four corners of the Tower on each floor. What else could he do. So a bit OTT by the officer

**A15 Claus 32**

**Amenity Space**

*“However, the proposed development provides little private amenity space for residents and the amount of child space is below the GLA guidance, whilst the under provision in terms of private amenity space is tempered by the provision of communal amenity space along with internal amenity / facilities, the under provision in child play space is not. This would weigh against the development in the balancing exercise”.*

**Amenity Summary** The following is taken from the Applicant data on the planning portal

Proposed Amenity in apartments (includes internal area in oversized units and

level 22 private terraces) We consider amenity space in oversized flat should be discounted

Proposed Internal Residential Amenity (includes Workspace Area, Kitchen,

Residents Gym, Lounge, Cinema, Amenity Rooms, Storage, Toilets & Lobby)

We consider any amenity space in areas where charges are applied for use should be discounted

A s106 contribution must also be secured to mitigate against any shortfall.

Not only is there a shortage of amenity space but that allocated is of very poor quality. There is no private amenity space apart from the 22nd floor terraces. Externally the majority is on the 2nd floor roof deck and located mainly to a narrow corridor strip located between a parapet wall and the east elevation of the north wing and between the south end of the north wing and the main tower. It will not get much sunlight and be close to openable windows of dwellings and the Travelodge and could be subject to the very unpleasant Tolworth Tower wind effect. There is a grassed area allocated to the south end of the site but this is close to A3.

The above schedule is rather confusing and we need to know exactly the shortages of amenity space. The shortages would not have been so bad had Meadows not changed Architects from the original submission and added 21 additional flats to the original 240 and squeezing out more of the family housing. More of the delivering sustantial profits rather than sustainable communities syndrome.

The Tower overall thus delivers a very poor quality of accommodation when measured in wellbeing terms despite the best efforts of the planning officer in emphasizing it good points of which there are few and minimizing or totally omitting the bad aspects of which there are many.

**Page A19 Clause 65**

**Highways and Transportation**

We suggested in our 1st comments on this development back in early February ’19 that we were fed up with so called transport consultants telling us what they consider the on-site parking levels should be. We now feel with all the works proposed for Tolworth that it was time for an actual survey so we have real facts not fake facts produced to meet an agenda. There are literally hundreds of one and two bedroom flats lining both sides of the Ewell Road, Tolworth Broadway and Kingston Road from Red Lion Road up to the Tolworth Station. Instead of fingers in the air spin a real survey of residents who actually live in the area on car ownership and how they are used. As regards this scheme Meadows have provided no examples of car numbers or use on any similar type BtR schemes with the same PTAL rating.

**Page A20 Clause 70**

**Highways and Transportation**

1. It is clauses like this that really annoy us as it insults our intelligence. The statement that the change of the tower from office to residential would reduce the daily car trips in the area by over a thousand is wrong and irrelevant and it was a pointless exercise in modeling it on a fully occupied Tolworth Tower which has not been the case for years if not decades or come to that ever. The Vissim model done a couple of years ago by TfL is based on a fully occupied CNM proposal along with Meyer Homes, Travel Lodge and Lidl which means that the savings on traffic movements is much overstated. This revised scheme needs checking with TfL to ensure it does not adversely affect their modeling **once the full extent of Meadows proposals for the whole site are made known.** The Tolworth interchange is virtually at 100% capacity and the line between excessive tailbacks and total grid lock is a fine one.

**Subsequent Phases**

* Shortage of information on what is to follow in any future phases. This could have a big impact on the local area and affect in particular the residents already on site, the Travelodge and M&S businesses and their customers and staff. The developer may want to develop the site in bite size pieces but it is time we all new the bigger picture.

From original information, when the scheme was first made known, excluding the Tower there was to be provision for a further 268 flats. The area of the site is stated as 1.32h of with phase one is 0.86h. We feel the local community has a right to know how this number of flats is to be squeezed into 0.46h. This would produce an unprecedented housing density of 583u/h for an urban area with a PTAL of 3

**Page A24 Clauses 95 to 103**

**Conclusion / Planning Balance**

This follows a similar pattern to the Meyer Homes report in that instead of being an impartial, informative and honest report giving the true fact about the development whether they be good, bad or ugly it becomes a piece of propaganda with the good being embellished, the bad being severely censored or spun and the ugly omitted completely. We have highlighted text in yellow where we consider spin, false facts, omissions or understating have been used to promote a recommended decision.