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9<sup>th</sup> March 2011

Dear Sir,

**Planning Application Number 11/00204/FUL  
Area Housing Office, Youth Centre and Car Park Site, Parkville Road, Swaythling,  
Southampton  
Design & Access Statement**

I object to the above planning application on the grounds that the Design & Access Statement submitted with the above Application is flawed to the extent that it cannot be used in support of the development.

**University Involvement**

It is evident from the Minutes of the meeting of the meeting at SCC offices on 4<sup>th</sup> November 2010 and telephone conversations I have had with Southampton University External Relations that Southampton University are remote from the application and are neither the applicant nor a co-applicant, despite the overwhelming use of the building being for University use. The application contains a fundamental requirement that no student parking is permitted and that this is effectively enforced and yet there is no detail of how this to be achieved. The position of the University and lack of specific detail on the management and operation of the site means the application cannot be credible without this detail being provided.

**Scale and Massing**

The scale and massing has increased greatly from the original proposal, which was in itself grossly out of keeping with the surrounding area. The tower has risen from 14 to 15 storeys, but the main change is the increase in height of the surrounding wings.

Previously they rose progressively from two to five storeys. Within the current proposal the wings are mostly six storeys high. Most of the wings are therefore over twice the height of Market Buildings, the highest other buildings in the vicinity and three times the height of everything else. The effect of this will be to grossly over dominate the area. The shadowing will result in Market Buildings and Phillimore road being in shadow for almost the whole day during the winter. No sensible argument can be made that the proposal meets the requirements of SCC's SDP9, which states that "*planning permission will only be granted for developments that respect their surroundings in terms of scale, massing and appearance.*"

SDP 9 goes on to say ""*The scale and mass of buildings determines the visual impact of the development and the impact on skylines within the city. Consideration will be given to the relationship of the proposed development to its surroundings, including the existence of and the setting of scheduled ancient monuments, listed buildings and conservation areas, as well as the topography. Decisions will also be made in relation to the combined effect of the arrangements, volume and shape of a building or group of buildings in relation to other buildings and spaces. The height of buildings should relate to the width and importance of the space, including streets, which they enclose. Tall buildings, five storeys or greater, carefully designed can make a positive contribution to city life and add to the image and identity of the city as a whole and is one way of creating landmark buildings. Tall buildings need to be designed with an appreciation or understanding of the context in which they are to be built and will be refused where they would have an unacceptable impact in terms of overshadowing or would be overbearing on their surroundings. The existence of a tall building on a site will not necessarily mean that a replacement tall building will be acceptable in principle.*"

The development would certainly have an overbearing effect on its surroundings – it will dwarf everything around it - and an unacceptable degree of overshadowing would result. The development makes no concession to the architectural value of the adjacent Market Buildings, designed by Herbert Collins, probably the most noteworthy architect in the history of Southampton. Market Buildings is of the same architectural style as the Conservation Area of Ethelbert Avenue, only 250m from the site. As discussed in the section in this letter concerning the Conservation Area, no detailed assessment has been made on the effect on the conservation area.

SCC expressed concern in the Minutes of the meeting of 4<sup>th</sup> November 2010 that the increased scale and massing of the wings would have a detrimental effect on the daylight provision within the courtyard of the building. Separate concerns are expressed by SCC in the Access Statement text concerning the recent design revisions that the scale and massing is excessive. The proposals have not changed significantly since these concerns were expressed.

The shadowing of existing properties has been made significantly worse than the previous proposals, which themselves caused an unacceptable impact on surrounding properties.

## **Accessibility**

Minutes of meeting of 29<sup>th</sup> November records “*PLO confirmed high car crime due to displaced parking in the area. Scheme needs to prove that remote parking is not going to have an adverse effect on staff etc. that use the medical centre*”. This statement is acknowledgement, absent from any of the transport or parking assessments, that the development is not self-sufficient in parking. The proposal in 2008 included 20 spaces for medical staff use for the same level of medical facilities. The current proposal is zero. This reduction in parking for medical facilities was queried by SCC in the Minutes of the meeting held on 19<sup>th</sup> January 2011. There is nothing in the submitted application which answers this point. This would indicate displaced parking of 20 cars for medical facilities alone. There is a high risk from this lack of provision that there would be difficulties for essential car use by medical staff. This would create problems that currently do not exist and cause grave concern for emergency access to medical facilities in the area the development serves. The parking required by the medical centre needs to be explained. The volume of the overspill parking needs to be fully assessed and account taken of the impact on the surrounding area.

SCC requested the provision of a car club be considered, but this idea has not been taken up, which will increase the environmental impact of the scheme, generate additional trips by motor vehicle and contribute to pressure for students to violate the no car policy.

## **Visual Aesthetics**

The Minutes of the meeting of the meeting at SCC offices on 4<sup>th</sup> November 2010 record that SCC wanted to see sculpting to the top of the tower. The sculpting that existed on the previous application has been removed, devaluing the “Gateway” feature of the development, which is fundamental to SCC’s perceived criteria for the success of the scheme.

## **Overlooking**

The height of both the tower and the wings are more than sufficient to cause an issue with overlooking of a large number of existing properties – notably in Parkville Road, Market Buildings and Phillimore Road. The scheme would, therefore, conflict with guidance in the adopted Residential Design Guide and with Local Plan Policy SDP1, which states that “*development, should not adversely affect the amenity of residents through loss of privacy or visual amenity.*”

## **Effect on Conservation Area**

The application makes no direct reference on how the effect on the conservation area

has been assessed. Mr Kevin White of SCC was unaware of any formal assessment having been undertaken by SCC as part of the application for any planning applications relating to the tower development. This omission should be corrected in order to properly assess the affect on the conservation area.

A photograph is included in the access statement that supposedly shows there will be no impact on the conservation area due to the location of an existing tree. This is a ridiculous statement, since the viewpoint only has to be changed by a few metres for the tower to be fully visible. The tower would be visible to everyone leaving Ethelburt Avenue towards the East.

The perspective view from the end of Ethelburt Avenue provided cannot be accurate, since the development would be roughly half the distance than the existing 16 storey university tower from the end of Ethelburt Avenue. The bases of the two towers are about the same elevation and the heights are similar. Therefore the new tower would look roughly twice as high as the existing one from the point under consideration. The perspective view provided shows the towers would look about the same height, which would not be the case. The impact on the conservation area would thereby be more than indicated. This also brings into doubt the other visual impact graphics used in the application, which may project the development in an unfairly favourable light.

### **Cycle Parking**

The only drawing found with the application that shows the proposed cycle parking layout within the building is the Artwork Fence Design dated 4/2/11 produced by Fluid. This shows what appears to be vertical cycle rack parking, which produces a very high density of parking. Even when used in accordance with the manufacturer's recommendations, this type of parking would be difficult to use due to the lack of space and the lack of a fixed point near the frames of the bicycles means the level of security that could be achieved would be low, leading to increased risk of theft. Lack of space and security concerns would lead to poor use of the facility, below its capacity. This would increase the tendency for students to use alternative modes of transport and increase the risk of abuse of the parking policy – particularly as bus access is not good. My comments regarding the transport assessment outline why this is the case.

A major problem with the proposal is that the layout as shown would be unusable due to the excessively narrow aisle widths shown, which measure approximately 910mm. This type of rack requires a minimum of 1.5m wide aisles. This was confirmed in a telephone conversation at 1.30pm on 3<sup>rd</sup> March 2011 with the technical department of Falco UK Ltd, manufacturers of the Falco Slim cycle rack. This rack provides the same longitudinal density of 2.66 bikes per metre as shown on Fluid's drawing and is therefore an equivalent product to that proposed. Adjusting the proposal for 1.5m wide aisles – and removing unusable spaces shown behind access doors reduces the capacity to a total of  $43+84 = 82$  spaces, a reduction of 30%. This reduces the available cycle provision to a maximum of 21% of the student accommodation.

To provide security and ease of use sufficient to satisfy the University, I suggest that parking be achieved using conventional cycle stands, which allow the cycle frame to be locked to a fixed point. The Cambridge Cycle Parking Guide, funded by Cambridge City Council quotes the maximum recommended density of 1.35m<sup>2</sup> per space and more generous density of between 2 and 3m<sup>2</sup> per space. Using a density of 1.8m<sup>2</sup> per space for the 88m<sup>2</sup> of space allocated in the development to cycle parking would provide 49 spaces. This would provide cycle parking for only 13% of the students in the accommodation. This is less than the 15% quoted in the application as the standard achieved elsewhere in Southampton University accommodation. This level of cycle parking would be inadequate given zero student car park provision, the remoteness of bus links and long walking distances to student facilities.

### **Community Use**

The development requires the demolition of the existing youth club and no direct replacement is being provided. SCC has a duty to provide accessible youth facilities. The suggested alternative of Woodmill does not provide a suitable location since it is too remote to be accessible. It also lacks facilities for disabled access which the current facility provides. SCC must provide an adequate alternative for the development proposal to be credible.

### **Existing Use of the Site**

A comprehensive recycling facility currently exists on this site for glass, clothing and other items. This facility will be removed as part of the development, but no details are provided of what alternative provision is being made. There is a risk that SCC's targets for improved levels of recycling will not be achieved in the area as a result.

### **General**

The proposal is for window cleaning (Section 8.7) by means of abseiling rather than gantry. This would appear to be an active design decision which would adversely affect safety of maintenance operations, contrary to the Construction (Design & Management) Regulations 2007. These Regulations place a duty on Designers to eliminate hazards and reduce the risks of construction, maintenance and demolition activities. Similarly the concept designs for Green Roofs show no edge protection, which could pose serious safety issues for maintenance without mitigation.

Yours faithfully,

**D.W.J Hopgood**

B.Eng (Hons), C.Eng, MICE, Chartered Highways and Infrastructure Engineer

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