

Beeston Civic Society

Objection to 22/00125/FUL

Beeston and District Civic Society OBJECTS to 22/00125/FUL for the following reasons:

1. Demand and Viability

1.1 Where is the evidence for the **need** for this PBSA in Beeston, **above and beyond** that of residential dwellings?

1.2 In light of reports of over-built university towns and tower blocks being 'flipped' to residential after being left unfilled, how will the Council ensure that Cassidy Group can show how the 419 units could be turned into apartments should Beeston already reach 'saturation' point and until are not taken up now, or in the future?

1.3 Where is the justification for single room accommodation vs. communal 6 bed flat units to permit future conversion if required?

By their very bespoke nature, PBSA student accommodation and its lack of external space restrict future alternative uses, preventing them from contributing to long-term placemaking. We do not wish to be left with a tower block that can't be inhabited.

A solution to this could be **mixed-tenure**, with affordable apartments, family flats, intergenerational apartments, and student flats to contribute to affordable homes NPPF requirement and the increased need for assisted living, dementia care facilities, and any student accommodation.

2. Design

2.1 Whilst we welcomed the attempt to break down the overall mass of the previous proposed development with different sized blocks we object to this application for many of the same reasons as were cited for objection to the previous application 19/00186/REM. Objection is increased further, however, by the increased homogeneity of the blocks – with any previous relief to the exterior provided by window detailing, recession, or balconies being now entirely removed. We consider that in design terms it fails. It cannot be said to integrate with its surroundings either. It fails to reflect or take inspiration from any neighbouring buildings other than the cinema which it appears to have used as its only reference point. Thus it is aggressively monolithic.

2.2 It is suggested within the *Design and Access Statement* that the proposals adopt the massing and elevational approach previously adopted by schemes 18-00360-FUL and 19-00816-REM.

However proposal 22-00125-FUL departs from previously approved schemes in a number of ways:

- Omission of balconies increases visual 'bulk' of proposal overall. [contd. over]

An example of how current proposals differ is given below:



Approved



Current Proposal

- Proposed fenestration treatment requires clarification. Whilst photographs within Design and Access Statement imply deeply recessed windows or articulated window detailing, submitted visualisations for 22-00125-FUL suggest minimal recesses and articulation of facades. This requires detailed clarification and further supporting documentation from the applicant.
- Elevational treatment of facade is flatter and glazed full height breaks in brick façade have been omitted and replaced with single fire escape doorways and small window penetrations which increase the overall repetitive character of all elevations.
- Elevation drawings 00611 and 00612 make reference to 'textured brickwork' in the included key (ref 17) but this is not described fully. Drawings suggest a heavy texture (with alternate horizontal courses projecting up 25mm – as was the case with previous applications) but it is unclear whether this is intended here. Clarification is required for this important elevational characteristic.
- The powerful visual elevational separation between ground/mezzanine level and floors above has been all but lost in application 22-00125-FUL on the Styring Street, Middle Street and Station Road elevations. This is a significant visual departure from previous submissions which exaggerates the visual bulk of the proposals and significantly lessens the overall quality the current proposals. [contd. over]



Previously approved outline and reserved matters proposals



Current Proposal

- The layout with private central courtyard only adds to the 'ghettoised' appearance of the tower block. The courtyard contains very little way of landscaping primarily, we assume, because it will be almost entirely shaded.
- We object to a design which shows a minimal attempt to avoid the appearance of flat and monotonous rectangular facades with little in the way of visual interest. We do not consider that the proposed metal bolt on balconies enhance the design in any way or ensure a good level of privacy, usable space or amenity for occupants.

Beeston once had many large mills and factories, even close to the town centre, but only two now remain nearby, and the scale of nearby buildings is generally no higher than 5 storeys. The proposed block facing Station Road will be higher than the nearby silk mill and both higher and longer than the Anglo Scotian Mills on Wollaton Rd but without any attempt made to ameliorate its visual dominance and impact on the street scene or to express human scale at ground level. The overwhelming appearance of verticality and height could be minimised by the use of for example horizontal detailing, setting elements of the building forwards or backwards to create rhythm and interest, incorporating curves, or detailing in brickwork to add shadow and depth. We particularly consider that the upper floors of the Station Rd block should be set back in some way to lessen the visual impact of height.

The public realm along Station Rd should be considered as important as that facing Styring Street. We consider that the proposed design makes no attempt to provide an attractive active frontage here but merely continues the service yard effect which currently exists on Station Rd and also misses an opportunity to design a residents' entrance which would establish a strong residential identity which could contribute positively to the street scene.

We question whether this proposal for student accommodation so close to the town centre should be seen as standalone, we suggest it should be seen as integral to all of its surroundings as a whole.

This is a wasted opportunity to create a real sympathetically designed and impressive "gateway building" at the Middle Street junction and can only be described as a "wayfinding point from Beeston Station" by virtue of its proposed height given that it is half a mile distant. However the tallest block will also clearly be a dominant feature on the skyline from both the adjacent conservation areas and other parts of Beeston. We are also concerned about the potential of this proposal to create a micro climate with an associated strong wind tunnel effect at street level. In addition it will overshadow the proposed public realm between the Interchange and Station Rd for large parts of the day.

We are disappointed to see that opportunity to use roof space has again not been taken. A roof garden, or additional amenity space would only benefit the project, and go some way to meet sustainability, biodiversity and landscaping requirements which the project currently falls so short of.

3. Planning Policy

3.1 Principle of development 6.3

Planners comments:-

*"The principle of mixed-use development on this site has been firmly established by Policy 11 within Part 2 of the Local Development Plan. Further to this, planning permission (comprising the original Outline consent and subsequent RM consent) for mixed use redevelopment, which includes **residential** and flexible retail/commercial uses, has previously been approved on this site. The proposed development is also of an appropriate scale and broadly matches the massing of the outline approved scheme. Whilst this development does not propose residential development under Class C3, the proposed scheme for PBSA (Sui Generis) is in keeping with the mixed-use policy allocation's key considerations and therefore considered to also be compliant with Policy 8 in Part 1 of the Local Plan as it would support the creation of sustainable, inclusive and mixed communities." (our emphasis)*

BCS comments:

PBSA (Sui Generis) is not residential and Policy 11 11.2 clearly states; -

11.2 The following key development requirements must be met.

3.2 Key Development Requirements:

1. New Homes: a) 132 homes (minimum).

2. Connections and Highways: a) Enhance the provision of clear, direct, safe and attractive pedestrian and cycling links to surrounding areas (including Middle Street and Station Road).

3. Green Infrastructure and Open Space: a) Public realm improvements (including the provision of seating and soft landscaping) to enhance the setting of the Conservation Area and quality of adjacent open space.

b) Ensure new open spaces form part of a network of spaces.

4. New Facilities:

a) Cinema.

b) Emphasis on viable uses to encourage a vibrant evening economy such as food and drink and leisure uses.

- c) Landmark buildings which provide a gateway into Beeston from the south and tram/bus terminus to the southwest.
- d) Ensure that development provides active frontages at Ground Floor level.

This development does not contribute any new homes and Policy 11 item 1 will not be met.

3.3 High Quality Design 6.7

Planners comments:-

"National and local planning policy seeks high quality design in new development that responds to the surrounding built environment and contributes to the character of the area. 6.8 Paragraph 126 of the NPPF highlights the importance of design by stating that the creation of high-quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve as good design is a key aspect of sustainable development, as well as creating better places in which to live and work and helping make development acceptable to communities. The applicant has ensured that the design is of sufficient quality, providing a significant improvement on what is currently located on the site."

BCS Comments:

Anything on this site would be an improvement as there is nothing on it.

3.4 The absolute minimum of floorspace has been given over to the student accommodation to cram in as many units as possible. Universities do not recognise these Studio apartments as good practice.

Quoting from Higher Education Policy Institute. Analytical Report 2:

"Studio. The smallest proportion of rooms but the fastest growing stock type due to high rents and commercial favourability. Mainly private sector provision, housing many international postgraduates, but **unpopular with universities.**" (our emphasis)

This Development does not align with:

- Local Planning Policy Part1 Aligned Core Strategy 5.7 Policy 8.
- Policy 11 within Part 2 of the Local Development Plan.
- Local Planning Policy.

3.5 The Development will result in the loss of Residential Accommodation being 132 Apartments made up of **40no 1 bed units** and **90no 2 bed units** which could have been used by families / first time buyers.

In conclusion the previous application was objected to very strongly by the Community which raised concerns about the overpowering massing of the building and "canyon" effect on Station Road. Beauty is in the eye of the beholder, but this Megalith and form of Architecture has no place in the centre of a small Town. In the original plans the massing was broken by balconies but with this presentation no thought to relieve the impact of the structure is present. Changing the colour of the cladding does not change the massing.

4. Foul / Storm Water

4.1 Letter from Severn Trent states; -

"Anticipated foul flows from the proposed development (combined total flow is Approx. 5.82 l/s @ 2DWF) could have a negative impact on the receiving networks, therefore is it important modelling is carried out to fully understand the impact on the network. Further downstream from the development there are reports of the sewer surcharging and flooding on occasion, sewer modelling will be required to ascertain the impact this development would have on the nearby sewer and downstream CSO chamber."

There is an attenuation storm water retention in the public realm that is designed to discharges at 7l/s, combined with the 5.8l/s making a total of 12.8 l/s. This would overtop the 300mm combined drain as proposed.

4.2 Errors in the Flood Risk Assessment report.

10.7 assessed on 388 units not the intended 419 as proposed.

Building assessed as 7 stories = ground / mezzanine + 5 levels above, this should read 6 above. Several documents in the FRA are taken from the previous application 19/00186/REM therefore whole assessment is flawed.

5. Parking and Transport?

The one positive aspect of this development there is only 6 parking spaces for 420 students. Therefore relieving the problem of many vehicles entering and exiting onto Station Road (Highways authority objecting strongly to those grounds at the previous submission).

However, this does mean that there is **inadequate** parking for number of students, and for commercial premises. *Local Plan* requires 1 car parking space per 15 students.

6 spaces including 2 disabled spaces is wholly inadequate for 420 student flats plus additional commercial C5.

Precedent exists : 19/00891/FUL is relevant as 162 student flats with 25 parking spaces – refused. Despite direct proximity of public transport links including tram stop being proposed as mitigation, a Councillor described 25 spaces for 162 students as “woefully inadequate”, another added “We are going to get up to 100 cars if this goes ahead”.

6. Secured by Design

How is the inner courtyard a safe space for cyclists and/or other users ? Passive overlooking is minimal with one roller shutter for access and only fire escape doorways for egress. The proposals appear wholly inadequate in this regard.

7. Section 106 contribution

We would request that the Planning Committee and Council Officers look seriously at whether this development, in such a landmark location, should be eligible for a Section 106 contribution.

This would seem an ideal opportunity to secure positive offsets to the impact of the development. At present, and as stated above, we are disappointed to see that opportunity to use roof space, or to provide additional amenity space at ground floor level has not been taken. This would go some way to meeting sustainability, biodiversity and landscaping requirements.

8. Biodiversity and Landscaping

8.1 Preliminary Ecological Appraisal 14.2.22 in application states:

"R1 Biodiversity Enhancement:

In accordance with the provision of Chapter 15 of the National Planning Policy Framework (Conserving and Enhancing the Natural Environment) and Local Planning Policy, biodiversity enhancement measures should be incorporated into the landscaping scheme of any proposed development to work towards delivering net gains for biodiversity. This could involve:

- **Planting of native and fruit bearing tree and shrub species to benefit nesting birds and pollinating insects;**
- **Install bird (such as swift boxes) and/or bat boxes on site.**" (Our emphasis)

8.2 Anything on this site would be an improvement as there is nothing on it. However, there is no evidence of net gains for biodiversity, and materials details do not include wildlife-friendly habitats as per the recommendation in the Ecological Appraisal. Beeston has Red Listed species resident in the area, namely Bats, Swifts/House Martins, and Bees.

Development should therefore include considerations for:

- **Bats**

The first [official IUCN Red List for British Mammals](#), four of the 11 mammal species native to Britain classified as being at imminent risk of extinction are bats.

- **Bat Bricks**

- The bat brick is a standard sized brick, shaped especially to allow bats to access the cavity of a house. They can be incorporated during both new build or renovation projects.

- **Swifts and House Martins**

- Swifts travel more than 14,000 miles to the UK every spring. They pair for life, and return to the same nest site each year. Nesting primarily on houses, under eaves or roof slats, Swifts increasingly travel all this way only to find their nest gone; replaced with uPVC fascia and soffits. A 58% decline from 1969 to 2018 brings Swifts to join the International Union for Conservation of Nature (IUCN) Red List of Threatened Species.

- Swifts should be a priority species in our Local Biodiversity Action Plan (BAP). Swift Conservation estimates that we need to create 20,000 new Swift nest sites every year just to stabilise the current population. Applying planning conditions to developments in Swift Alert Areas will help to achieve the local BAP and NPPF aims of safeguarding existing swift nest-sites and promoting the protection and recovery of a priority species.

- According to RSPB's *Swiftmapper*, Beeston has significant areas of nest sites, and there are recent records for breeding Swifts - which could justify creating the whole town as a Swift Alert Area.

- **Swift Bricks**

- Swift bricks are inexpensive, simple and discreet. Replacing a single brick, they're made from clay and recycled plastic and different designs can be incorporated into most designs. Where bricks are not in use, swift nest boxes can be installed to provide the same habitat.

- **Bees**

35 UK bees species are under threat of extinction, and all species face serious threats.

New developments are an opportunity to introduce measures which help our bee and pollinator species: flowering trees, hedgerows, nectar-rich ornamental plants and herbs, window boxes, green roofs, living walls and SuDS. None of these is present in the application details.

- Access provision should also be made for hedgehogs via 'highway' and openings in walls, fencing and boundaries.

These actions matter because they help developers attain reputable sustainability certifications – such as Building Research Establishment's Environmental Assessment Method (BREEAM) points, as well as contribute positively to biodiversity and habitat in the area.

8.3 There are **no Landscaping details whatsoever** included in the application. Omission of the podium garden alters the roofscape characteristics for users and the environmental credentials of the scheme. Loss of south corner external space further reduces this. This represents a scale-back even from previous application. What landscaping there is is minimal and does not constitute attractive green space to benefit health and wellbeing of residents.

8.4 Tree planting is reduced from previous application. Public realm trees are few and far between, especially along Station Road – where there is ample space to create a more 'treelined street' appearance.

8.5 This projects represents the **best opportunity Beeston has** for green roof or rooftop landscaping. Green roofs can give a wide range of benefits, these include:

- reducing the amount of surface water running off the roof and so reducing the risk of flooding;
- providing habitat, shelter and feeding opportunities for local wildlife – some of whom are Red Listed;
- helping to meet the targets of our biodiversity action plan;
- improving the character and appearance of the building;
- boost the environmental credentials of a the project;
- providing extra heat and noise insulation;
- keeping the building cool in the summer;
- helping to reduce the amount of dust and pollutants in the air;
- creating additional amenity space; and
- contributing to health and welfare of the building's residents.

8.6 Tall building with large windows represent a hazard for bird species. Patterned glass should be used in very large windows.

“The main option for bird-safe construction is patterned glass. Patterned glass deters collisions by making glass visible to birds. Effective patterns have a density with spacing under 50 mm pacing, with markings at least 5 mm around. Denser patterns can also potentially reduce solar heat gain, which can help offset extra material costs by reducing cooling costs.”

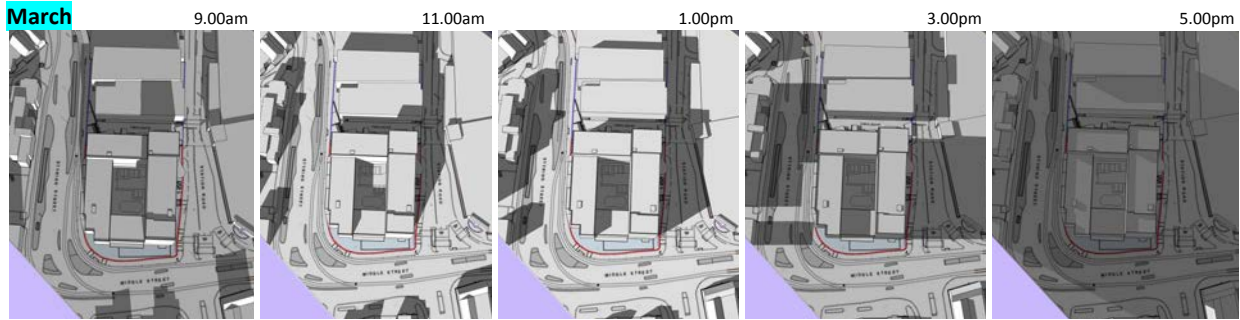
Institute of Civil Engineers
(ice.org.uk)

8.7 The central courtyard will be almost entirely shaded – shade tolerant, native species should be selected for this setting to tolerate such conditions, maximise lifespan, and support wildlife such as any would be present.

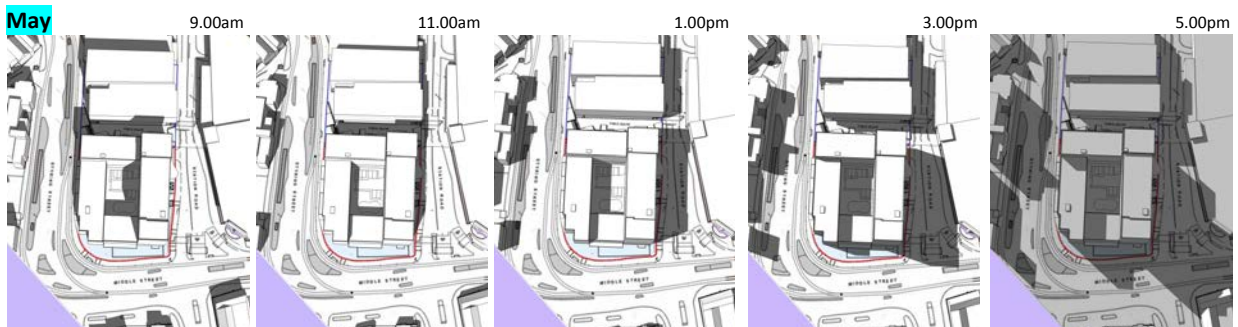
9. Sunpath Analysis

The sunpath analysis included within the proposal does not comprehensively show impact on public and private realm. Here is our sunpath analysis:

22/00125 Sunpath Analysis



Note how the public realm is in shadow except for a brief period between 2pm and 3pm. The social area of the central court is in permanent shadow.

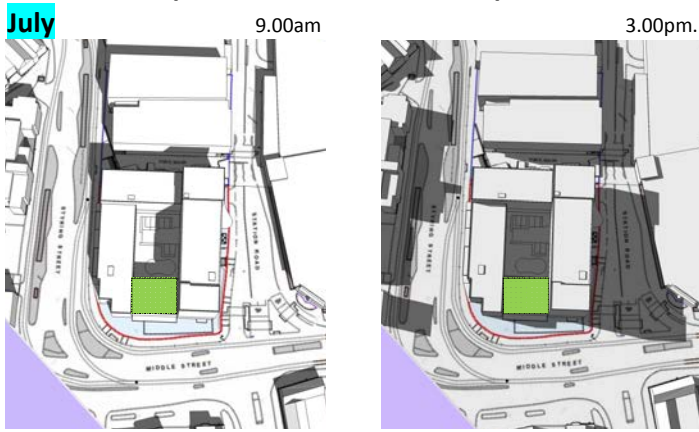


Note how the public realm space is only directly sunlit between 12.30pm and 3.15pm. The social area of the central court is in shadow except between 12.30 and 3.00pm.

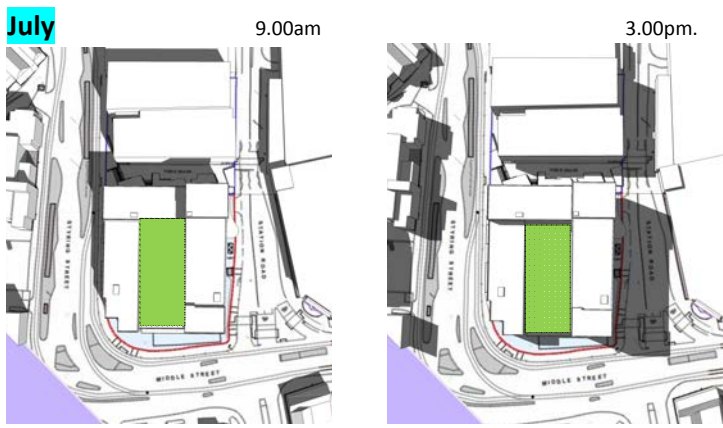
[contd. over]

This shows the difference between approved proposal and the current proposal, with attention given especially to the reduction of sunlight and amenity space from loss of the podium.

Exploration of 22/00125 Proposals



As Proposed



If podium included

This illustrates how the 19/00816 proposal included significant useable podium amenity space and greater car parking capacity.

10. Sustainability

Overview:

The planning application 22-00125-FUL is unusual as it cites previous applications (18-00360-FUL and 19-00861-REM) which established precedent. **Thus it is important to understand the somewhat lengthy chain of prior applications relating to this site to be able to comment properly.**

The site was subject to an initial full application for Cinema/Restaurant combined with an outline application for the remainder of the site in 2018 under application reference:

18-00360-FUL.

- A. The Design and Access Statement submitted as part of this application, stated " careful consideration of the scheme massing has maximised daylight penetration into public spaces" (section 5.1 Pg.40).

1. This related to the Phase 1 full application for the Cinema/restaurant and adjacent public realm space and identified the importance of maximising daylight in the public spaces in and around the site.

- B. The application also included a Phase 2 Design Code for the remaining elements of the site. It is unusual to submit a Design Code but its purpose, as stated, is to secure overall design intent whilst not being too prescriptive.... "maintaining flexibility for designers and developers to adapt the block composition and accommodation in the most appropriate way to suit site and market conditions. As such any design, massing and uses indicated within this document are for illustrative purposes only"

2. The Design Code states that it must be read in conjunction with 15 detailed supporting documents relating to Phase 1 to ensure the integrity of the Phase 1 development is maintained once further development is known. (1.0 Overview, Pg.2). It is constantly referred to in both this and all subsequent applications and is therefore a very important document forming part of the 18-00360-FUL approval.

The Code discusses scheme layout. (Section 3.0) as follows:

"The massing and layout of this (Phase 2) block should accord with the parameter plans which define the public realm and building lines..... across the development <and> careful consideration should be made of the distance between phases and the need to ensure an *appropriate* relationship between neighbouring blocks."

3. This highlights the importance of a correct visual relationship between proposals and neighbouring properties.

- C. Finally the Code discussed Massing and Building Heights. Especially (in 4.1) the importance of balancing the "existing street massing" with the importance of acknowledging the "landmark nature of the gateway at which it stands".

4. With regards to massing, it discusses the "subdivision of blocks into multiple to ensure that that any Phase 2 proposals do not read as one amorphous block. Glazed elevational treatment/visual breaks and setbacks are given as examples of how this could be achieved (Section 4.2 & 5.4) whilst adopting appropriate massing which acknowledges adjacent building heights on street frontages whilst increasing the development height on the corner of Station Road and Middle Street "as this would be seen from the railway station and act as a strong visual and wayfinding reference point."

With regards to height, the Code states " commercial and residential floor to floor levels should suit proposed site levels and likely future tenant requirements"...and continues "it is not intended that the maximum height parameters to the block(s) will be used in full. These have been set to give flexibility in the location of services..."

5. Thus, the scheme height is given within the Code as a MAXIMUM and overall size and massing will, it assumes, vary according to future use and market conditions (e.g build cost) which will also have an influence.

- D. The triangular plot of land on the corner of Middle Street and Styring Street

6. Whilst not in direct ownership (at the time of the application) 18-00360-FUL highlights the importance of the "definition of Middle Street which is affected by the triangular plot of land located on the intersection of Middle Street and Styring Street."

The subsequent approved proposal 19/00816/REM also recognises the importance of this parcel of land too as part of the streetscape. See especially Section 5.2 Paragraph 3 which make reference to its potential use as a "focal landscaped residential entrance opening the scheme up further...."

Thus this is considered a significant landmark at an important road junction.

Application 18-00360-FUL (cinema/restaurant) gained approval with outline approval for phase 2 subject to submission of reserved matters. These became the subject of a second application in 2019.

19-00816-REM.

This is submission concerned Reserved Matters which required addressing as a condition of the previous application. The key document it contains is the Reserved Matters Application Document which was broken down into sections to address the specific 'reserved' items listed in the original approval. Of particular relevance are the following:

- E. The Overview makes reference to the requirement to read the RMA in conjunction with 15 Phase 1 documents plus Phase 2 design Code and the previous Hybrid Planning Application 18/00360/FUL.
- F. The Layout chapter states: "The massing and layout of the proposed scheme in this document fits within the parameters of that set out in the Phase 2 Design Code."

7. So clearly the Design Code from 18-00360-FUL is still an important document when developing massing, size and layout.

- G. The Scale chapter discusses how the proposal's massing complies with the Design Code as follows:

"The proposed design acknowledges the existing street massing whilst maintaining its gateway landmark identity. This is evident where the massing scales up from the central landscaped strip, <public realm> for which the height relates to that of phase one. Stepping up to the landmark corner at the junction of Station Rd and Middle St.

Continuing "The wider nature of Station St. lends it to being able to support the tallest part of the proposed development and a wayfinding point from Beeston Railway Station.

8. This is contentions. See note 9.

"The lowest part of the scheme is that which is adjacent to the Transport Hub located on Styring Street. The height reflects that of the neighbouring buildings, avoiding the canyon effect".

9. The width of Station Road is 22m adjacent to the public realm space, widening to 35.4m at its junction with Middle Street.

Middle Street measures 44.5.

Styring Street measures 34m.

So Station Rd. is the narrowest and least appropriate position to place the highest accommodation to avoid the 'canyon effect' the designers propose to avoid.

Setbacks and breaks remain a feature of the proposals within the RMA application and typical the floor to floor height is 3150mm to allow for services in accordance with 4.3 of the Design Code.

- H. Again, the importance of the 'landmark corner' on the junction of Station Road and Middle Street is highlighted.

10. See also comment 4 which discusses how the original design intent was to emphasise the height of the scheme at the Station Road / Middle Street junction ONLY. Maintaining this height along the full Station Road frontage is therefore inappropriate without good reason.

- I. The RMA concludes with a Summary (11.0):

"We have developed the design from outline planning approval within the principles of the Design Code, resolving the design to..... ensure that the building is articulated to break down its overall mass".

11. According to the specifics of the Design Code, this does not appear to be the case.

The application also included a Design and Access Statement (Rev 02) which supported and broadly duplicated the content within the RMA.

- J. The Overview makes reference to the requirement to read the Design and Access Statement in conjunction with 15 Phase 1 documents plus Phase 2 Design Code and the previous Hybrid Planning Application 18/00360/FUL.
- K. The Scale section states: "The massing and layout of the proposed block(s) is in accordance with that defined in the Phase 2 Design Code"

12. This again, highlights the importance of adhering to the approved Design Code within 18-00360-FUL.

13. An Energy Efficiency and Sustainability Statement (EESS) for Phase 2 (heating / solar measures / energy performance etc.) DOES NOT appear to have been submitted as part of this planning application. No reference is made within either 18-00360-FUL or 19-00816-REM to an EESS Phase 2 document and no Condition relating to it appears on record. It is impossible to assess whether the Phase 2 proposals are sustainable without this and it is difficult to understand how approval could be granted without it.

Current Proposal

22-00125-FUL.

This most recently submitted application proposes, alongside commercial premises student flats instead of 1 and 2 bed residential properties.

The application description is as follows:

"THE CONSTRUCTION OF PURPOSE-BUILT STUDENT ACCOMMODATION BUILDING (SUI GENERIS) AND GROUND FLOOR COMMERCIAL UNIT (CLASS E(g)(i)) WITH ASSOCIATED ACCESS, CAR PARKING, LANDSCAPING AND INFRASTRUCTURE AT LAND BOUND BY MIDDLE STREET AND STATION ROAD, BEESTON, NOTTINGHAM, NG9 1FX"

And pre-application advice given in relation to this proposal states:

"The general principle of student accommodation and retail development is acceptable in this location. Whilst the principle of the massing proposed in respect of both proposals D1 and D2 is deemed acceptable, this would be subject to appropriate use of materials, the creation of active frontages with the aim of adding local interest to establish a landmark development and gateway into the town centre."

- L. The accompanying Design and Access Statement gives a description of the accommodation proposed under 4.3.

M. Under the 'Massing 4.6' section the following statement is given:

"The massing was established in the outline and Reserved Matters applications by Leonard Design. Our proposed scheme will match the massing of the approved scheme".

14. Why ? It would be reasonable to expect new proposals to respond to the demands of a new use in accordance with the approved Design Code. It is contended that the new proposals do not do so.

"Station Road is the primary axis road from the Train Station to the South, up to the Town Centre. The taller elevation here has been designed as a counterpart to the Tesco superstore opposite".

15. Does the designer mean 'counterpoint' ? The presumption is that the designer proposes to maximise heights along the Station Road elevation simply to achieve an architectural contrast between the 'smallness' of the Tesco store and the 'bigness' of the new proposals ? It is suggested that this is insufficient justification.

The Design and Access Statement continues : "Each block is designed to be individual and specific to its location and surroundings whilst also being part of a cohesive whole. This is achieved through the use of repeatable details that are consistent across the scheme, such as brick recesses, metal window panels and textured brickwork at lower levels".

"All blocks compliment the monolithic massing which was positively supported by the Design Code, the phase 1 cinema and the approved scheme. The combination of different but complementing languages in the residential and commercial facade treatment creates a distinction between public and private areas".

16. As previously discussed in Background: Section C, both in this and other sections of our comments submission, we suggest that the proposals do NOT fulfil to approved principles stated in the Design Code from 18-00360-FUL.

N. The proposals also include an Energy Efficiency and Sustainability Statement for both the student accommodation and the commercial unit.

With regard to the student accommodation, using national energy performance criteria a 'Notional (average) Building' of similar character would be expected to use 204kWh/m² whereas for the actual building the corresponding figure is 191 kWh.m². This represents a reduction in energy consumed of up to **6.5%** compared to the minimum building standards.

17. It is suggested that this is not a particularly dramatic reduction in energy consumption - especially when considers that the impending upgraded Part L Building Regulations will likely close the gap between the 'Notional Building' and this proposal still further.

O. The project will also seek to reduce energy and CO₂ consumption, through:

Reducing energy consumption through passive design features such as maximising useful solar gains, daylighting and passive cooling.

Specification of energy efficient plant and low and zero carbon technologies where possible and where appropriate.

Reduce water consumption at the point of use, and consider schemes to recycle rainwater.

18. No explanation is given as to how this will be achieved.

P. The EESS continues: "Carbon emissions will be reduced primarily with the use of 'passive' energy efficiency measures which will reduce the demand for energy rather than meet a larger demand for renewable sources. The achievement of passive energy savings on regulated loads can be done by passive energy-saving initiatives such as, but not limited to:

Provision of high thermal performance by means of increased insulation and high performance glazing systems to reduce heat loss.

Close attention will be paid to detailing to avoid thermal bridging in the building fabric.

Where possible, the implementation of generously sized windows for good, even daylighting will improve the 'feel' of a room and reduce electrical lighting use.

The use of passive ventilation techniques such as 'cross-ventilation' and the 'stack effect' to allow the natural flow of fresh air. This will provide supply air to a space as well as removing stale air.

19. The plans show that almost entirely, the student accommodation has one window so cross ventilation will not be possible. Neither will stack effect as there are no vertical air circulation routes within the proposals currently. All other proposals stated are the minimum required by current building regulations it would appear.

Q. The EESS again continues:

"The proposed development shall benefit from the following general services provisions. Further explanation of the rationale is noted below."

"Heating via electric panels throughout the student accommodation residential spaces, with enhanced controls."

20. This relates to the vast majority of spaces therefore.

"Air source heat pump heating and cooling to the more densely occupied amenity spaces, and the Class E space."

21. These will have dedicated flue requirements which are not currently described within the application.

"Hot water provided by high efficiency gas fired condensing hot water heaters."

22. No explanation is given as to whether these are local point of use boilers (which also serve student showers and sinks) located within student rooms or whether they are located on each floor level serving a wing, or whether a central gas boiler is located in the ground floor plant room. Each will have dedicated flue requirements which are not currently described within the application.

"Natural ventilation to bedrooms where possible (due to acoustic environment), alongside Trickle and boost extract ventilation to adjoining bathrooms and kitchen spaces."

23. From the submitted information this is generally NOT possible as most student rooms are single-orientation. So they will have dedicated flue requirements which are not currently described within the application.

Mechanical heat recovery ventilation (MVHR) to any other bedrooms and kitchen living dining spaces (due to acoustic environment), as well as the more densely occupied amenity spaces and the Class E spaces.

24. These will have dedicated flue requirements which are not currently described within the application.

LED lighting throughout, with PIR presence detection to corridors / communal areas, and likely absence / daylight dimming controls to the Class E space

25. This is the minimum required by building regulations. Note nearly all corridors are not naturally daylighted except at their extremities.

Provision of Photovoltaic panels at roof level.

R. Finally, the EESS concludes:

"A number of occupied spaces within the complex cannot use passive means such as natural ventilation due to the location (acoustic restrictions), use of space (occupancy) and / or no access to external openable windows, or indeed rely on the benefits of thermal mass....

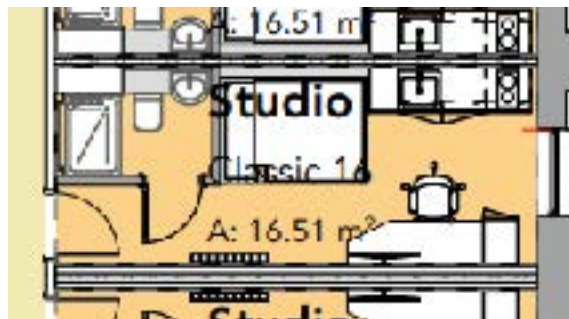
...Thermal Comfort Assessment The proposed buildings will feature, predominantly, a natural ventilation bias to the student accommodation, in terms of provision of fresh air for occupancy to comply with minimum standards, and the control of summertime temperatures. There will be exceptions to this, as noted above, where the external acoustic environment precludes this option, and mechanical ventilation solutions have to be used."

26. As at least 50% of the student accommodation faces the street, it is suggested that the number of rooms which will require mechanical ventilation and heat recovery will be significant.

27. The EESS does not contain a full BRUL Output Document so it is unclear what proportion of student accommodation has been modelled with full MHVR and what proportion has been assumed to be naturally ventilated. BRUL data was submitted with 18-00360-FUL for the cinema / restaurant proposal and it is suggested it might be reasonably expected to accompany this application to and that further clarification is generally required in respect to energy performance and overall strategy.

Services Strategy

S. It appears the current intent, specific to this proposal, is to incorporate individual MHVR packages within student rooms where natural ventilation is not possible. Thus there is no real necessity for deep service voids within corridor spaces. Or indeed within student rooms - if the ventilation systems are incorporated within the built-in cupboard / sink /overhead storage units with termination / intake vents on external walls to the side of windows (rather than above them). The layout certainly appears to lend itself to this arrangement.



28. Clarification is sought as to whether this is the designer's intention.

T. It further appears that the intent is to include purge air ventilation to internal corridor spaces for fire control purposes. Presumably these would require ventilation grilles on external walls - which are not currently shown.

As there is no necessity for service voids above corridors (see above) other than perhaps for hot water circuits and electrical distribution, and if purge vents are not proposed on external walls, then vertical riser ducts will be required.

As an observation, the ground floor plans show blue 'stores' at all four internal corridor corners. The immediate assumption would be that these would be carried up to other floors (as smaller spaces) to permit vertical service distribution and it is surprising that this is not the case. If these vented at roof level then corridor purge ventilation and normal air distribution could be provided without the necessity for deep service ceiling voids throughout the building at each level.

U. This would bring significant benefits:

- A reduction in floor to floor height perhaps 2.7m with a corresponding overall height reduction on Station Road of circa 3m if parapets are reduced. (see accompanying diagram.)
- A corresponding reduction in overall building volumes which need to be heated.
- A corresponding reduction in external building envelope through which heat can be lost.
- A corresponding reduction in building construction costs in the order of circa £150-£250/m² for external walls depending on makeup.
- A corresponding reduction in embodied energy at the construction stage.
- A reduction in overshadowing and corresponding improvement to the streetscape and surrounding environment.

Conclusions:

Taking all of the above into consideration the following observations are submitted for consideration:

- The current proposals do NOT comply with the approved Design Code in respect of massing, setbacks and visual breaks.
- The submitted EESS requires further clarification.
- Justification is required for the overall height of the proposals on all elevations.
- How the proposals meet best practice in terms of the Fabric First approach stated within the EESS – especially with regard to (i) embedded energy and (ii) whether the current strategy of high floor-to-floor levels is appropriate.

It is suggested that further clarification is required in respect of the above to ascertain whether the proposals fit the criteria necessary for a 'presumption in favour of sustainable development'.