



Dukelease

Prime Central London

23 Old Bond Street
London W1S 4PZ

+44 (0) 207 629 8282
www.dukelease.com

A. Slee Esq.
141 Holcroft Court
Clipstone Street
London
W1W 5DN

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Dear Mr Slee,

87 – 125 CLEVELAND STREET PROPOSED REDEVELOPMENT

Thank you for sending us your detailed comments as a response to our public exhibition. You have raised a number of concerns relating to the proposed redevelopment of 87 – 125 Cleveland Street. We would like to respond to each of these comments in turn, and hope that we can address your concerns.

1. Increasing the level of anti-social behaviour

You suggest that there are a number of factors which might encourage anti-social behaviour along Clipstone Mews, which include:

- the re-provided petrol filling station (PFS);
- the bar use;
- the proposed landscaped gardens; and
- Servicing to the PFS and retail units.

Westminster emerging policy includes a requirement to include a PFS in this location. The PFS will include a small retail offering, but it will not be as significant as that attached to the previous PFS. Furthermore, since the previous shop closed, there have been a number of other retail offerings opening in the surrounding area, which are expected to retain much of their trade, even if the new PFS opens. The purpose of the provision of this PFS is to accommodate drivers that need petrol when they are in central London.

It is expected that the PFS will sell 2 to 3 million litres of fuel per annum which equates to an average of around 200 fuel-related vehicle arrivals per day. A more refined prediction of vehicle numbers is difficult to establish but a survey at the 4-pump / 8-fill PFS on Sloane Avenue located between Fulham Road and Kings Road recorded just 122 vehicle arrivals between 7.00am and 7.00pm, including 19 motorcycles. As such an estimate in the order of 200 per day is considered to be robust and represents an average fill in the order of 30 to 40 litres.

The PFS will not be a 24 hour operation, with the intention to be open between the hours of 7am and 11pm. To ensure that it is not used outside of these hours, it is intended to include security shutters, which will be approved through discussions with Westminster.

Regarding the bar use, with doors opening onto Clipstone Mews, which might result in people congregating and leaving noisily, we understand the concern about increased noise for those residents. We have amended the proposals to ensure the doors open onto Cleveland Street, and not Clipstone Mews. We also understand that the current operator has managed to improve this situation through self-management, and we would expect any future occupier to do the same.



In any event, we anticipate any use that relates to the evening economy will include planning conditions that would restrict the hours of operation to minimise any anti-social noise issues.

The provision of landscaped terraces for the residents has also been raised as a concern, as residents may remain outdoors late at night, and cause a disturbance to residents of Holcroft Court. This space is part of the amenity provision for the scheme, which will also improve the outlook for a number of residents within Holcroft Court. The issue of noise generated by residents staying in this location would not just be a concern for Holcroft Court, but also the residents within the new development, and they would share the concerns about noise disturbance. So, we believe this will be self-policing. To further ensure this does not become an issue, there will be provision in the leases to prohibit late night use. The landscape architects will look to include noise blocking features to the landscaped courtyards to absorb refracted noise from hard surfaces.

The final noise concern relates to servicing, based on the proposal being significantly larger than the existing building. It should be noted that although there is an increase in mass, there will actually be a slight reduction in the overall commercial provision, so the deliveries and servicing for these units may not differ significantly from the existing level of use. The only increases in service vehicle activity are expected to arise from the petrol filling station (three deliveries per week on average) and from deliveries made to residents such as parcels, on-line food shopping, etc. We anticipate conditions governing timing of deliveries to be imposed by the Council and would encourage residents to indicate their preferences and observations to officers via the consultation process.

As well as Clipstone Mews, the edge of the Clipstone Street carriageway may also be used by delivery vehicles as the existing entry and exit routes to the former petrol filling station will be closed up, offering an additional road side location for vehicles to pull alongside.

It should be noted that in all of these cases, the inclusion of active frontages along Clipstone Mews, as well as the fact that this is primarily a residential scheme, will help to ensure that self-policing takes place to inhibit anti-social behaviour.

2. Increased traffic on Clipstone Mews

We acknowledge that the location of the PFS will result in an increase to traffic onto Clipstone Mews. The Mews is carrying an average of 350 vehicles per day at present. This will increase by approximately 200 vehicles per day visiting the PFS during its opening hours and based on surveys elsewhere is unlikely to exceed 20 – 25 additional vehicle arrivals during any one-hour period.

The traffic surveys on the mews identified average vehicle speeds in the order of 16mph to 18mph. Only 12 vehicles out of a total of 1,044 vehicles to cross the survey line during the period of the survey were recorded in excess of 30mph. Hence there is no evidence to suggest that speeding vehicles are a problem along the Mews. Notwithstanding the survey data, we are examining options to improve pedestrian routes with raised table features at either end of Clipstone Mews which will also encourage speed reduction and improve safety.

3. Daylight impact

As set out in our exhibition pack, the bulk and massing of the proposal has been designed with the surrounding uses in mind. This include the university building on the opposite side of Clipstone Street, which generates the height for the proposal. However, we are aware that as a result of the increase in size, there will be impact on the existing daylight levels in Holcroft Court.



In light of this, we have undertaken a thorough Daylight / Sunlight Assessment, which assesses the existing and proposed levels of daylight into each room of the existing site.

We will submit this information to Westminster as part of the application pack, which sets out that due to the existing levels of light, the proposal will not have a significant impact, beyond what is usual for residents in central London.

Officers have accepted that, of the of the 60 apartments facing onto Clipstone Mews, all but four would retain levels of daylight to living areas typical of dwellings in central London. Of the four, two are dual aspect flats benefiting from windows facing Clipstone Street. Another has retained light levels of 14% Vertical Sky Component; the Building Research Establishment's primary test for daylight, where 15% is considered to be an acceptable base level. There is only one flat that falls slightly shorter on the VSC method, though the one affected daytime space is in fact a kitchen and the apartment as a whole benefits from factors to do with the original design of the estate that employs an unusual dual facing duplex arrangement where living rooms for most apartments face onto the courtyard.

Another notable characteristic is the urban situation. 87 – 123 Cleveland Street has an unusually low massing for such a large footprint building for which any change in massing would appear at first sight to give rise to an unacceptable impact. Analysis has found this not to be the case. At present Holcroft Court enjoys levels of daylight far superior to situations commonly found in central London and the reduction due to the proposed development brings the levels in line with those found elsewhere in the central area.

4. Scale and massing of Block A

The height, bulk and massing of the proposal has undergone a rigorous series of tests to establish the current form. These tests considered the local context, responding to the heights of the university building on Clipstone Street for the southern block and the building heights on Cleveland Street and Clipstone Mews for the central and northern block. Sunlight and Daylight, Local Views and Permeability were all part of this process. The form has changed throughout the design process and a number of massing options have been tested and discussed with various consultants and Westminster City Council and the consensus is that the our current approach is correct for this location. As part of the application we have also prepared a pack to show accurate verified views which a heritage consultant has reviewed and found that the massing complements the surrounding context.

The three blocks are the following heights at parapet level:

- Block A – 34.725 m
- Block B – 15.825 m
- Block C - 15.825 m

5. Cladding materials further impact on loss of daylight

The building materials have been carefully selected to provide a bridge between the modern and traditional materials present in the local context. The majority of the façade will be of a light coloured concrete / stone material surround to all windows, with brick used as a framing device. The final brick type has not been confirmed but we see this as being a brick which combines grey and brown tones complementing the existing context. As part of the visual impact assessment, the heritage consultant has argued that the quality of materials and design will enhance the local environment.



6. *Overlooking*

The apartments which face onto Clipstone Mews have been designed so that living rooms face into the courtyards away from Holcroft Court. However, there are three apartments along this façade in which living rooms have windows facing Clipstone Mews, all three of these apartments can be found in block C, but their primary window faces into the courtyard. The remaining windows facing Clipstone Mews are either corridor or bedrooms. Glazing techniques to obscure views towards Clipstone Mews will be investigated on this façade.

In light of the above comments, we believe that this proposal is the best possible approach to the redevelopment of the site, and will address the majority of the existing issues around the site, while ensuring that the proposed development is sympathetic to the surroundings.

We trust that this response shows that we are aware of the issues that face this site, and that we are intending to address as many of these as we are able.

Yours sincerely



Richard Leslie