23 May 2012

Dear Hugh and Karl and team,

I am writing on behalf of Hackbridge and Beddington Corner Neighbourhood Development Group (HBCNDG) with our feedback on your proposal to develop the Wandle Valley Trading Estate in Hackbridge. Thank you very much for sharing your proposals with us in person on 18 January, on 2 and 8 February and most recently on 9 May 2012.

Hugh, you have been engaged with the community as we have developed our plans for a sustainable suburb, as far back at 2006 I believe, and we really appreciate how you have joined in the spirit of what we are trying to achieve here. We are grateful for the time that you and the new wider team involving Charles Church have taken to discuss your proposals with us this year.

Thank you for your kind words. It's nice to think we were all practicing localism with a small L, well before the present government invented it!

We have considered your proposal against the objectives of the Neighbourhood Development Group (NDG) and the One Planet Living Principles, which frame the local planning guidelines and commitments. We would like you to take the following points into account as you finalise your planning application for the Wandle Valley Trading Estate.

Many of these comments will come as no surprise as it was just what we discussed in the meetings. Ideally, we would like to see the planning application set out to show how it meets the objectives of our Neighbourhood Plan and One Planet Living.

We would like to emphasise that One Planet Living means having a strategy to enable residents and workers to live within a sustainable ecological and carbon footprint in what you are providing for them in this development. The ten principles can help you to achieve this as a guiding framework. Some factors will be outside of your control e.g. public transport, but the spirit of one planet living is that you try to make it easy for people to live happy, healthy sustainable lives and more difficult to live a typical average lifestyle which is unsustainable, being three times higher than the planet can sustain. Therefore best attempts must be made to achieve this, for example by talking to public transport providers in the example given above and coming up with creative ways to support sustainable living where barriers arise. We note that you have made a good start on this with your two page summary about the one planet living principles in conjunction with your proposals for "Wandle Riverside" the name you have chosen for the redevelopment, which sounds very nice by the way. And in your draft residents manual.

We would like to highlight three areas which remain key issues for us at the Wandle Valley Trading Estate, and which we feel need some more work to really enable us to create a sustainable suburb here in Hackbridge. We have drawn these to your attention in our meetings. They are;

- 1. Employment land and the need for Wandle Riverside to be a mixed use development;
- 2. Zero carbon in building energy use;

3. Sustainable transport.

We have thirty three questions and comments and suggestions, which for ease of reference, are captured under the six theme headings of the HBCNDG sub-groups and include the three points.

LOCAL ECONOMY

Plan Objectives - stimulate new local sustainable businesses - buy and source locally - support community friendly shops & cafes - sign up to a business sustainability charter.

One Planet Living Principles –Equity & Local Economy, Local & Sustainable Food,

We were pleased that you recognised our concerns and presented your ideas and proposals to us for employment on the site on 9 May. From our point of view sustainability is as much about creating sustainable jobs as it is about zero carbon emissions.

We completely agree with this last point.

Whilst we were reassured on 9 May that you are taking this issue seriously in your proposals, I think we all agreed there were still some action points associated with this.

The Wandle Valley Trading Estate is one of a very few sites in the borough designated for certain types of employment. The Council have re-designated it as mixed use to help bring forward investment and improvements in Hackbridge. But they have said that 40% of the land is to be used for employment and that it must be a mixed use development and HBCNDG agrees with this.

We agree it should be a mixed use development. As we stated at our last meeting on 9th May, we do not agree that employment provision mustbe based on site area, but instead should be based on the number of site- specific appropriate jobs which can be provided and the compatibility of uses. In our view, the type of employment most appropriate for this site and which would deliver most local benefit could include small light industrial workshops, R&D studios, craft studios, incubator units and the like.

On 9 May you said that you think that the uses for which the Wandle Valley Trading Estate has permission are not totally appropriate for the site. You noted that category B2 heavy industry would lead to a lot of lorries and that B8 Storage use has a low density of employment to land space is not appropriate for this site because not many jobs would be created and also the highway there is congested. That leaves b1b and b1c which you think can be successfully integrated into the proposed Wandle Riverside development.

Agreed. We also consider that some ancillary/supporting B1a would be appropriate.

You explained how the equivalent amount of jobs expected given the uses currently prescribed for it, could be created and located 100% on the island site (Area A). However this will be less than 40% of the land area. You said perhaps 100 to 120 brand new jobs in sustainable industries, start ups, incubators, a business hub in a floor space of around 4,000 square metres on two floors.

This does appear attractive and could fit well with the aims of the community here and the London Borough of Sutton. We do like the sensitive approach to the redevelopment of the Island site taking into account its historical nature as an employment site presented by yourself and Charles Webster.

At this point CW presented his second body of work which was a more detailed explanation of building types and layout considered appropriate for the Island site, which built on his first presentation of the 9 May 2012. A summary of the accommodation proposed, the sqm provided and the number of jobs which could be delivered by this scheme follows overleaf.

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|--------|----------|--------|-------|--|---------|-----|--------------|
| Unit | Floor | GIA | NIA | Туре | sqm/FTE | FTE | of each Type |
| Ex. | GF | 157.1 | | Community Hub / Leisure | 36 | 4 | |
| Ex. | FF | 157.1 | | Community Hub / Leisure | 36 | 4 | 314.2 |
| 1 | GF | 25.9 | 22.3 | General Office | 12 | 2 | |
| 2 | GF | 25.9 | 22.3 | General Office | 12 | 2 | |
| 3 | GF | 97.5 | 87.4 | General Office | 12 | 7 | |
| 4 | FF | 97.5 | 87.4 | General Office | 12 | 7 | |
| 5 | GF | 97.5 | 87.4 | General Office | 12 | 7 | |
| 6 | FF | 97.5 | 87.4 | General Office | 12 | 7 | 441.8 |
| 7 | GF | 95.2 | 82.5 | Start up studios (R&D) | 12 | 7 | |
| 8 | FF | 104.4 | 95.2 | Start up studios (R&D) | 12 | 8 | |
| 9 | GF | 105.2 | 92.5 | Start up studios (R&D) | 12 | 8 | |
| 10 | FF | 116.1 | 106.8 | Start up studios (R&D) | 12 | 9 | |
| 11 | GF | 63.3 | 50.2 | Start up studios (R&D) | 12 | 4 | |
| 12 | FF | 128 | 118.3 | Start up studios (R&D) | 12 | 10 | |
| 13 | GF | 137.1 | 122.6 | Start up studios (R&D) | 12 | 10 | |
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| 17 | FF | 120.5 | 116.7 | Workshop (Light Industrial) | 47 | 2 | |
| 18 | SF | 120.5 | 116.7 | Workshop (Light Industrial) | 47 | 2 | |
| 19 | FF | 101.7 | 89.1 | Workshop (Light Industrial) | 47 | 2 | |
| 20 | SF | 101.7 | 89.1 | Workshop (Light Industrial) | 47 | 2 | |
| 21 | FF | 112.7 | 108.8 | Workshop (Light Industrial) | 47 | 2 | |
| 22 | SF | 112.7 | 108.8 | Workshop (Light Industrial) | 47 | 2 | |
| 23 | GF | 95.5 | 85.1 | Workshop (Light Industrial) | 47 | 2 | |
| 24 | FF | 95.5 | 85.1 | Workshop (Light Industrial) | 47 | 2 | |
| 25 | GF | 113.3 | 102.8 | Workshop (Light Industrial) | 47 | 2 | |
| 26 | FF | 113.3 | 102.8 | Workshop (Light Industrial) | 47 | 2 | |
| 27 | GF | 165.3 | 152.5 | Workshop (Light Industrial) | 47 | 3 | |
| 28 | FF | 165.3 | 152.5 | Workshop (Light Industrial) | 47 | 3 | |
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HBCNDG agreed that we would like to include these proposals in our Neighbourhood Plan but that some more research and development of the proposals is needed first. We therefore have the following suggestions or questions.

We are delighted that you wish to include our proposals (or further developments thereof) in your neighbourhood plan.

1. We would like to be sure that the Island site proposal is economically viable. You noted that you are doing this in any case and will share it with us. We look forward to seeing this.

We will provide a Viability Assessment as part of the application submission. However, it should be noted at this juncture that surpluses derived from residential sales will need to be transferred across to this site to enable it to happen. The Council's own Viability Report (prepared by Roger Tym to support the CIL Preliminary Draft Charging Schedule) concludes that both office and industrial as stand- alone developments are unviable. Therefore to facilitate the delivery of such uses, cross-subsidy with higher value uses, such as residential, is required.

 We asked you to find out and tell us how many jobs are on the Island site and the site B and C right now and what are the business uses. You said you could do this. We agreed this would be helpful in weighing up how this compares with the new jobs that would be created. We look forward to seeing this information.

There are currently approximately 150 jobs across the 3 sites in total. A good percentage are not permanent.

3. We are concerned that jobs will be lost on the Areas B and possibly C in 2012 as you redevelop the land but that the Island site will not be redeveloped until 2018. That is six years. We would therefore like you to consider including some new employment space in the first phase. The ideal location for this would appear to be in Area B adjacent to existing employment space and the road. This could start to develop the market for the forthcoming Island site and might even attract home purchasers who would like to work close to home. This came out in our neighbourhood planning process as something which parents especially could find really attractive. Train fares are expensive and parents prefer to be closer to their children as they can get delayed and be late collecting them. It's part of the ethos at BedZED which works well. This could also address LB Sutton and HBCNDG concerns about retaining 40% of the land for employment. We look forward to hearing your view on this.

Jobs will not be lost: they will be displaced. The majority of the existing businesses on the site are only there because they can have short term leases and very low rents. Job loss on Areas B & C will not start until mid-2013and jobs on the Island Site will continue until 2018. There are some businesses which would be going in any event and others which will relocate. Some no doubt, across the road to the Willow Road Estate, where there are numerous vacancies.

The Council's draft Masterplan showed mixed uses for sites B & C comprising flats and integrated commercial floorspace (which we can only presume would have been B1a and possibly retail i.e. compatible with residential). However, given the proliferation of flats elsewhere in Hackbridge, we do not believe a flat led development is an appropriate or

sustainable option. We are therefore proposing a predominately family housing led scheme, with the aim of encouraging people to put down roots and establish a place. We do not believe that employment uses, of the type which the Council and yourselves are now alluding to, are appropriate immediately adjacent to family houses. Who wants to walk through a commercial development to get to their new pride and joy?!? Furthermore, it would be inappropriate in assisting and enhancing the setting of the three Listed villas which should be "respected, preserved and enhanced" under adopted policy.

4. Another suggestion is to bring forward the redevelopment of some of the vacant properties in the Island site. Would this be possible?

We will contact the long leaseholder and are hopeful of being able to do something in this regard.

5. We would like to know that the London Borough of Sutton are happy with your proposals for the employment aspect of the redevelopment. We would like to work with you to develop a solution that addresses the needs of you as developers, the local community and the London Borough of Sutton. Our suggestions are very much in that spirit.

So would we! When we have concluded this period of community involvement we will be presenting the scheme and all of your comments to the LB Sutton, particularly in regards to the employment aspect of the scheme. We would like to continue working with you in taking the project forward.

In addition,

6. We would like to invite you to join in with brainstorming sessions with the London Borough of Sutton about creating a green economy. This could help you and us to develop ideas for new sustainable jobs in the area.

We would be delighted to join in with your mind-sharing sessions.

7. We asked if you could support the local economy by employing local trades people, buying from local suppliers and training young people in a trade on site, perhaps working with Carshalton College. Please can you tell us about this in the planning application.

A Local Labour Strategy will be submitted under planning condition. We would respectfully note that unless building commences, none of these, or any of the other benefits will ever come to pass.

UTILITIES

Plan Objectives - develop a viable local energy programme - build a district heating network under local control- Implement a zero waste strategy - Implement a sustainable water strategy.

One Planet Living Principles - Zero Carbon, Zero Waste, Sustainable Water

Zero carbon

The Local Planning documents specify that all developments in Hackbridge should be zero carbon in building energy use where feasible. As we discussed we interpret this as developers having

undertaken a study to develop a strategy to achieve zero carbon emissions from building energy use. We were pleased to meet your consultant Mark Bryant with Karl in February. Mark clearly has a lot of experience. As we mentioned at the time we would like to actively engage with you on this. We have the following requests related to this.

 As we mentioned in February and May we would like to see your zero carbon in building energy use strategy for the site as soon as possible and discuss this with you. We also suggest it should be submitted with the planning application.

We can confirm that an energy strategy and sustainability statement will be submitted as part of the application. We will start with passive measures in the building fabric. This will all be part of the viability exercise and ultimately comes down to what is feasible when the project is considered as a whole. There will undoubtedly need to be an element of compromise in each of these areas in order to ensure delivery. We note that there has been no mention of education contributions which we know is something very important to local ward Councillors. The scheme must remain viable and the NPPF recognises this.

2. We are pleased that you were able to attend the information briefing by Viridor about the potential for district heating in the area. We would like to know more about how this could be included in your zero carbon in building energy use strategy.

For all the reasons previously stated, I reiterate that we do not consider district heating system a sensible, commercially viable or even necessary energy strategy for this site. We will invite our energy consultant along to our next session to discuss this further.

3. In February we discussed the possibility of two options in your planning application - one that incorporates a Decentralised Energy Network connection and one with standalone energy provision. Will you be able to do this?

As per the above.

Sustainable Water

4. All new homes will have water meters. We understand that the development will also include water conservation measures as required by your water conservation strategy including low-flo taps. Please could you not put outside taps in, but rather include rainwater collection such as water butts, and other measures that help retain and possibly reuse "grey water".

Yes we will consider the use of water butts. However the re-use of "grey water" is unlikely to be possible.

5. The site lies adjacent to the Wandle and is affected by both fluvial and pluvial flood risk. We are sure you are aware of it, but in case you are not, we refer you to the Toolkit on Blue Infrastructure: Designing for Climate Change and Flood-risk Environments in Hackbridge.

A full Flood Risk Assessment will form part of the planning application and the EA, as a competent statutory authority have been and will be fully consulted during the application process.

6. We understand that you will implement a sustainable urban drainage system in the development. Is this correct?

Yes this is correct.

Zero waste

7. Each property will have external recycling bins that complement the Council's system. You are preparing a residents manual and we asked you to include this information in this "welcome" pack and to design internal features that encourages waste hierarchy (avoidance, reuse, recycle, etc). Please can you provide for composting.

Again we would like you to include all of this information in your planning application.

Yes. These points are noted and welcomed.

TRANSPORT

Plan Objectives - co-ordinate public transport services - reduce cars and car use- encourage the move from cars to walking and cycling

One Planet Living Principles - Sustainable Transport - Health and Happiness

1. We suggested when we met in February that you ideally need to develop a sustainable transport strategy for the project and suggest that you could market the development as offering a better quality of life which includes reduced dominance of roads and cars, however with access to a car and public transport when people need them. This will bring your proposals into line with the local planning strategy to achieve one planet living. Please can you tell us more about your proposals for this.

Sutton have confirmed that based on the sites low PTAL rating, maximum car parking standards must be met. This also accords with all marketing advice received. The obvious benefit of this is that there will be no on-street parking off site in surrounding roads such as Wood Street.

2. We discussed the need to encourage reduced use of cars in the new development. If you are trying to enable residents to achieve one planet living then the premise for the strategy must be to reduce car use by 50% compared to the local average. We are pleased that you are considering including a car club as there will be sufficient numbers of residents to make a car club viable. We think your parking ratio is too high and should be reduced to 0.6 per dwelling. We will also speak to London borough of Sutton planning department about this. We would like to discuss these points with your transport consultants. This works well at BedZED which is only a slightly larger development of 100 homes. You may wish to be aware that the NDG were recently made aware that Centrale, the new development on the London Road, has signed-up to a car club (three cars will be on site) and new residents will be offered free membership for a year, when they move in. We know you are interested in this. Will you be offering a car club?

We do share your desire to reduce use of cars and will certainly be offering a car club and will consider other measures.

3. Car clubs and reduced parking, together with improved sustainable transport provision, should discourage second cars and maybe even discourage residents from owning a car at all. This is what has happened at BedZED where car use is reduced by up to 50%. BedZED has a ratio of 0.6. Perhaps you could therefore justify fewer car parking spaces and build more homes on the space freed up. Are you able to take this on in your proposal?

As per the answer to Question 1. It is important to note that BedZED and Centrale are much closer to the station and the buses on the main road.

4. To improve sustainable transport provision we would ideally suggest that you include space for cycle storage inside the home (even if what works best is not entirely consistent with CSH standards). Is this possible?

We will consider this.

You have some good proposals on access and to ensure that the riverside walkway/cycleway connects effectively to other strategic links. Please do tell us more about this.

We appreciate that we have been showing you the employment land or the residential land in isolation. We shall revert with an overall plan showing full connectivity.

6. We discussed bus services and would like you to work with London Transport to improve bus connectivity for these residents and all residents of Hackbridge. Please tell us what proposals you think will help enable residents and workers to use public transport and how you plan to advance this with TFL and the council, including with Merton council.

Again we will be submitting a full Transport Assessment and TfL will be a statutory consultee during the application determination period.

7. We encourage you to make a "shared surface" or Home Zone design to allow for a genuinely safe space where children can play on safely. Is this possible?

Thank you. We will consider the above.

HOUSING & BUILT ENVIRONMENT

Plan Objectives - showcase sustainability best practice - use a defined set of design principles - coherent, unified design for the area.

One Planet Living Principles - Sustainable Materials

We have the following questions for you about housing and the built environment. We also ask that you consider them when finalising your design.

1. How does the development's design help to engender a sense of neighbourliness?

The scheme comprises houses with front doors, space for children to play together, general interaction and increased opportunities for natural surveillance et c.

2. What is the character of the place, and how does this relate to the site's history?

This will be a brand new development but will bring back public access to the riverbanks which previously did not exist.

 Are buildings orientated to create positive frontages, in terms of: active frontages between buildings and adjacent public open spaces ensuring building fronts face onto other building fronts (with back-to-back gardens) avoiding rear fences, walls and blank end gables exposed to adjacent streets and spaces,

The layout is not yet finalised and we will consider your comments.

4. Is there an attractive strategy for the riverside that combines building frontages, attractive landscaping for amenity and biodiversity,

As above.

5. What are the environmental standards for the buildings? How has layout been influenced by solar orientation and other environmental factors? How is it proposed that the scheme integrates with the zero carbon in building energy use strategy?

As above. We will be building to Code for Sustainable Homes Level 4.

6. What materials are being incorporated in the design and are they sustainable, from recycled or re-use, low embodied impact and ideally locally sourced.

To be advised but they will be sustainable and locally sourced where possible.

7. What is the rationale for locating employment facilities? Have other, perhaps more appropriate, arrangements been explored?

The rationale behind the siting of the employment space is covered elsewhere. However in our opinion the Island site is the most appropriate arrangement and is the one where viability can ensure delivery as a final phase of the building works.

8. Is there a positive network of pedestrian routes? (linking to the surrounding context and with routes lined by building frontages that accord with secured by Design principles)

Covered above but yes there is a positive network of both cycle and pedestrian networks the joining up of which will be facilitated by the opening up of this site.

Does parking provision dominate?

Not yet finalised but being addressed.

10. How adaptable and robust are the buildings - have they been future-proofed?

Yes the buildings are both Lifetime Homes and London Plan compliant.

11. Are there play spaces? (with toddler play spaces overlooked by nearby homes)

Yes toddler spaces for 0-5 year olds are proposed with plenty of garden space, safe access to riverside and common land for older children.

12. Considering the layout of the Island site, we support the opening up of the industrial site to allow people to walk through, as proposed, particularly if there is information about the industrial past of the island and the current listed building incorporate into the scheme. However unless the site is fully permeable and visible and linked to other pathways care needs to be taken not to create a security issue on the weekends.

Noted. Your suggestion that brief information about the industrial past of the Island and the current Listed Building will be incorporated into the scheme.

COMMUNITY, CULTURE & IDENTITY

Plan Objectives - better connections/remove barriers between estates- sense of identity based local history and landmarks- celebrate cultural diversity already existing here- include well-designed public space - ensure overall design meets needs of all interest groups - encourage school involvement in the wider community -health services are provided to meet the needs of changing demographics of the area.

One Planet Living Principles - Culture & Community, Health and Happiness

Health and happiness

Developing the project in the ways that are being discussed in this letter would make everybody healthy and happier - considering reduced car use and more cycling and walking and especially if all ages could be encouraged to spend more time outdoors, to make best use of communal spaces, especially near the rivers edge.

Noted and endorsed.

Culture and heritage

We would like you to draw out local historic features and local vernacular in the buildings. You have already shown that you wish to in the Island site and would like to hear more about this in the Charles Church development. Please do emphasise this in your application.

Noted and endorsed.

ENVIRONMENT

Plan Objectives - strengthen corridors for wildlife and people - create a better pedestrian experience - make/manage open spaces to be safer and more accessible - champion wildlife gardening- improve green spaces and play spaces.

One Planet Living Principles - Land & Wildlife

We understand that you are in direct contact with the local conservation group and we support their proposals to you. We have received great help from Norman and his team.

Finally, we talked about showing all the sustainable lifestyle features in the show home as part of a strategy to encourage sustainable living from the word go. The marketing and welcome pack will also complement this approach. Together with meters showing energy use. We would like to hear more about your plans for this in the planning application.

We understand that you will be able to provide a response to all the points raised on 6 June when we next plan to meet. I would like to thank you once again for all the time you are taking to work with us to create a truly sustainable community. We are sure that this will be worthwhile on many levels, we think that this through and considered attention to these details will enhance the marketability and USP of your development which can only help the bottom line.

We would also like to thank you and your team Helena for your useful comments and hope that this work and the refinements to your Neighbourhood Plan and the local policies will all be worthwhile.

If you need any further information, please don't hesitate to contact me or other members of the NDG as appropriate.

Yours sincerely

Helena Barrowclough Chair Hackbridge and Beddington Corner Neighbourhood Development Group 07982246923