



**Hackbridge & Beddington Corner
Neighbourhood Development Group**
hackbridgeandbc@gmail.com
www.hackbridgendg.com

Mr Jody Williams
Development Control
London Borough of Sutton
24 Denmark Road
Carshalton
Surrey SM5 2JG

12 August 2016

Dear Mr Williams

C2016/73672 - OBJECTION

References:

- A: Your letter C2016/73672 – Former Felnex Trading Estate Site dated 29 July 2016.
B: Our letter to Development Control dated 13 May 2016, objecting to reserved matters – Annex A
C: Our letter to Development Control dated 13 April 2016, objecting to changes to outline planning permission – Annex B

Please accept this letter of **objection** to your Neighbourhood Notification of Planning Application - Revisions at Reference A. For clarity, we have summarised a number of key points of concern with respect to your latest letter. We have not rehearsed all of our concerns again, as these have been covered in some detail in previous correspondence. For ease of reference, this can be found at Annex A and B to this letter. It is paramount that this letter is read in conjunction with both Annexes.

Supermarket (Block B)

What is the rationale behind changing the location of the entrance to the supermarket, from London Road to Felnex Road?

We object to the entrance of the supermarket being moved because;

- The plaza becomes a potential dead space that is only a thoroughfare to the residential flats.
- The supermarket entrance has been moved to a narrower part of the footpath that is actually a shared cycle path. We are most concerned about a clash between people entering and exiting the supermarket and

passing cyclists and consider this to be a dangerous location for the supermarket entrance.

Excessive height/bulk of buildings

Sutton Council's site allocation DPD BW12 identifies the Felnax site as being located within an area of tall building potential (4-6 storeys). The Hackbridge Centre for Regeneration and Growth Map (Figure 5 on page 55 of the Sutton Core Planning Strategy DPD) identifies this as an area of 'mid-rise' tall building potential. The definition of 'mid-rise' tall buildings is a building that has 4 to 6 storeys and is between 12-18m in height (Core Planning Strategy, Appendix 6, page 144).

- We note Block A (18.75m), Block B (21.4m to ridge of penthouse) and Block C (18.3m) all exceed the height of a mid-rise building as defined by Sutton Council. The heights were confirmed by an email from Kate Stewart, Barratt Homes, received 26 April 2016, in response to a request from the NDG.
- The heights of the residential blocks as stated above exceed this and do not respect the scale and character of the surrounding area. Directly opposite Block A are two-storey Victorian cottages. We have been concerned throughout this application regarding appropriateness of the scale of the proposed scheme for Hackbridge.

Assisted Living (Block A)

- The recently provided light report produced by Point Surveyors (May 2016) fails to provide assurance around issues of loss of day and sunlight. The report is entitled 'consented v. proposed' but we have never seen the light report for the 'consented' scheme. We believe the figures quoted are just the difference between the schemes and not the overall percentage loss of light. It is clear that a 6-storey building will dominate the skyline and is going to have an affect on the 12 Victorian cottages opposite. The only feasible mitigation for this is for the footprint of the building to be set back significantly.
- We have been provided with measurements from the kerb to the footprint of each of the blocks proposed along the London Road. In the case of the Assisted Living block, these measurements have only compounded our concerns. The pinch-point on the corner does not allow enough room for passing of mobility scooters and the building line should be set back as previously recommended in Annex B to this letter.

Access/traffic problems/need for car parking

- The 80 assisted living flats proposed under Class C2 are in addition to the 725 dwellings that were originally proposed for the Felnax site, increasing the density. This will only further exacerbate a growing problem with parking across Hackbridge but particularly acute on those roads surrounding the Felnax site. A factor ignored during all stages of this planning application. Please refer to Annex A and B for detailed concerns in respect of this issue.
- The bus interchange does not deliver. The whole point of the interchange was to provide residents with just one stop from which to catch either one of the two services to Wallington, as well as being in close proximity to Hackbridge train station. The site will now provide two bus stops, with no indication how the buses are to be routed and what will happen to existing

bus stops? Artist's impressions for the site are misleading and still show the bus stop on London Road.

- Changes to the road layout on both Hackbridge Road and London Road remain a concern. Please refer to Annex B.
- It remains unclear whether the underpass from the site to Hackbridge train station is to be utilised or not. Lack of any clear decision has influenced design unfavorably.

Inappropriate design/layout?

The current drawings provided for terraces 24 and 25 do not reflect individual gable roof design, as agreed during earlier discussions with Barratt Homes. This is worrying as although changes are reflected in the D&A Statement, the individual drawings need to be updated, so the wrong designs are not built.

We have previously outlined our concern that there has been no information about how the residential dwellings will be built to Code for Sustainable Homes Level 4. We have already raised a number of questions under the heading of 'Environmental Strategy' in Annex A and add the following questions:

- (1) Has solar orientation been considered and maximized to passively heat each dwelling?
- (2) Was solar shading considered to west and south facing windows so that living spaces don't overheat during summer?

Noise/vibration

While the planning application is supported by both a Traffic Management Plan and Construction Method Statement, it is clear that neither of these documents is detailed enough to protect the listed buildings and Victorian houses within the immediate vicinity of the site.

As stated at the beginning of this letter, it is imperative that Annex A and B are read in conjunction with this letter.

Yours sincerely

L Horrox

Lysanne Horrox
Chair, Hackbridge and Beddington Corner NDG



**Hackbridge & Beddington Corner
Neighbourhood Development Group
hackbridgeandbc@gmail.com
www.hackbridgendg.com**

Mr Jody Williams
Development Control
London Borough of Sutton
24 Denmark Road
Carshalton
Surrey SM5 2JG

13 May 2016

Dear Mr Williams

**Your reference: C2016/73672 – Former Felnex Trading Estate Site –
OBJECTION**

General Observations

Firstly, we would like to acknowledge the positive response to some of our comments on earlier proposals by the developers. In particular:

- they have completely redesigned the supermarket to be at ground level with an active frontage. This is a massive improvement,
- they have incorporate green living walls around the supermarket facade,
- there are more open landscape spaces between the flats fronting onto London Road.

We are however concerned that the consultation on Reserved Matters has taken place before a decision on the “minor changes” Application (**C2016/73625**) has been made. This is confusing to residents who think they have already commented on the Application. Indeed it has been confusing all round, as the wrong Application number has also been quoted on planning documentation and sent out to residents.

We also consider it unacceptable that this Applications contains over 200 documents, mostly tagged “drawing”. This will have acted as a substantial disincentive for any member of the community to review and comment. We would urge the Council to ensure that future Applications meet minimum standards of user friendliness.

We therefore think it only reasonable that all comments associated with Application 73625 should also be put against application C2016/73672. After all, how can you really comment on something that hasn't yet been approved?

We **object** to the following issues in Reserved Matters Application 73672

The comments below should be taken together with our response to Application C2016/73625, contained in our letter dated 13 April 2016 (attached below)

General Infrastructure

- There is concern that Hackbridge will not be able to cope with the density of 725 homes, let alone a further 80 homes under the guise of assisted living. This will bring pressure on public transport and roads as the majority of commercial space is being replaced by residential, so people will need to commute to find work. Putting in a supermarket and a few shops, does not rectify this situation.
- There are no details given of the proposed bus interchange, which the design and access statement states will be retained. This is one opportunity for some sort of semi public art or special feature to be incorporated into the scheme, like an edible bus stop.

Environmental Strategy

- No information appears to have been provided, such as an Environmental Statement, confirming how the buildings will all be built to Level 4 Code for Sustainable Homes, other than a one paragraph statement in the Planning Statement. This is not acceptable since Hackbridge is intended to be an exemplar sustainable suburb. We had raised this issue previously with Barratts and we would like to know the following;
 - How drainage is being dealt with in a sustainable way?
 - Will rainwater be harvested to be reused for flushing toilet?
 - How will water consumption be reduced?
 - How will electricity consumption be reduced?
 - What is the strategy for bicycle parking?
- In addition, what environmental standards will the commercial spaces be built to? This has not been clarified.

London Road

- There is insufficient information contained in the Application to ascertain the overall height of the blocks along London Road. We have requested information regarding the height of these blocks, but this has not yet been forthcoming. A detailed cross section through London Road is needed so that the relationship between the buildings can be determined.
- There is insufficient information to assess the distance from the curb to the buildings, along London Road and Hackbridge Road.
- Because of this lack of information we are unable to reassure ourselves that the Victorian cottages opposite the development on London Road will not be severely deprived of light. A light report has been requested but not yet supplied.

- We are concerned that the Planning Statement (para 6.3) refers to “the commercial scale of the London Road frontage”. This appears to be the basis on which the development has been designed; yet it fails to recognise the scale of the shops and houses along London Road.
- Adding lights on London Road at the junction of the Felnex estate provides safe crossing, however how will this impact the roads the other side of the bridge when traffic is queued? Should yellow boxes be introduced?

Hackbridge Road

- Drawings for terraces 24 and 25 (opposite Hackbridge Green) do not reflect the individual gable roof design as discussed. In the Design and Access Statement it says these terraces are the same as The Square, which is correct?
- Affordable housing should be ‘pepper potted’ amongst the site. Placing two blocks of flats opposite a block that already is affordable housing could lead to antisocial behaviour.

Affordable Housing

- We welcome the number of affordable dwelling that will be provided, which will be approximately 20% of the overall number of dwellings. Our main concern however is how many of these will be social rent, affordable rent and transitional housing. The average household income in Hackbridge is approximately £41,000 per annum. There are also a growing number of household who are renting privately whilst ownership is dropping, therefore we believe there is a greater need in our area for affordable rent and transitional housing as the average Hackbridge household cannot afford the price of a typical house in Sutton. We are also concerned that the Assisted Living Flats will not be affordable for local residents,

Parking

- Parking is a major problem for many Hackbridge residents, largely due to commuters using the nearby Hackbridge station. We would like to know whether Sutton Council are making any plans to introduce a CPZ in Hackbridge, and whether it will apply to the Felnex development (ie whether the roads within the development will be adopted).

Landscaping

- There are mature trees along London Road, and if, as is stated in the Planning Statement, these are to be removed it will further degrade the outlook along London Road. These trees should be replaced with mature canopy ones and not the twigs that are seen in the images produced.
- The plaza in front of the Assisted Living Flats, which fronts onto London Road, should be deeper to enable some if not all of the existing mature trees to be retained and incorporated into a more considered landscape design. The current proposal looks bleak and lacking vegetation.

Construction

- Building work has constantly started before 8am on site, this is unacceptable.
- Previous demolition work has resulted in the damage of the listed cottages on The Green and the Red Lion Pub. There is no assurances how piling and other vibration works will be carried out protecting these properties and also the Victorian houses on London Road.

We would welcome the opportunity to meet with the developers and the Council to address the issues contained in this letter.

Yours sincerely

L Horrox

Lysanne Horrox
Chair, Hackbridge and Beddington Corner Neighbourhood Development Group



**Hackbridge & Beddington Corner
Neighbourhood Development Group**
hackbridgeandbc@gmail.com
www.hackbridgendg.com

Mr Jody Williams
Development Control
London Borough of Sutton
24 Denmark Road
Carshalton
Surrey SM5 2JG

13 April 2016

Dear Mr Williams

Your reference: C2016/73625 – Former Felnex Trading Estate Site

We **object** to this application for “minor changes” to the approved Outline planning application C2014/68760/OUT. The reasons are outlined below:-

Assisted living block

We are concerned by the relocation and significant increase in size of the Class C2 care facility from 3,051 square metres to 7,740 square metres. The change from 90 rooms to 80 1 and 2 bedroom units considerably increases the density and mass of the site.

- This exceeds the 725 homes allowed in the outline planning permission, albeit under the banner of assisted living.
- We haven't been provided with sufficient information for the needs case specifically for Hackbridge, especially if this type of accommodation is less affordable for local elderly residents. Indeed the evidence from Sutton Council's Local Plan that is under consultation states that they only require 42 units per year in the whole borough.
- We are worried that this change will result in a business opportunity that will be of no benefit to residents of Hackbridge and an onerous block whose location has not been considered in relation to the Victorian terraced houses opposite.

- The design does not take into account Sutton Council's Core Strategy policies BP12 and BP13; BP12 relates to "good urban design" which should respect the local character; BP13 states that "tall buildings must be well designed and make a positive contribution to the skyline, respect their local context and be designed to visually integrate with the existing townscape"; our view is that the proposals are not in conformity with the existing townscape, which consists predominantly of two- and three-storey buildings.
- The interface with the school is not clear, as to whether the playground is overlooked, the overshadowing from the building and the height of the boundary wall. Are these apartments to be single aspect?
- The supermarket, the assisted living building and the flats on London Road should share a building line which will accommodate the existing mature trees and soften both the vehicular and pedestrian entrances to Felnax Road. An additional benefit would be the reduced overshadowing to the Victorian terraced houses.

Elevational design

Local residents are overwhelmingly disappointed by Saxon House, which is overbearing and completely out of sympathy with the local architectural vernacular. It seems inappropriate to introduce this building as a "marker" for how Hackbridge should look and feel, especially when no effort is made to blend with the existing two-to-three-storey shops and houses typical of the neighbourhood.

Supermarket and residential above

We recognise that access to the supermarket has been improved, in response to our earlier feedback, specifically ground floor active frontage and elimination of the travelator. However, we have some outstanding objections:

- The previous design for the supermarket would have exceeded the height that would have been acceptable for this site, in terms of Sutton Council's planning policy – allowing for up to a maximum of six storeys.
- This current planning application places the supermarket on the ground floor, which should result in the reduction in height of one retail storey, while still retaining the four-storey apartment block above. The "heights of buildings" key, as detailed on page 23 of the Design and Access statement appears to indicate that the height of this building (supermarket and apartments) is now six storeys. Please clarify.
- In addition, London Borough of Sutton have suggested for "architectural reasons" one penthouse apartment should be extended up to the 7th storey. Surely, this is Sutton Council failing to adhere to its planning policy? Please clarify.

Flats on London Road

The design is not adequate, and the building as proposed will be overbearing and out of character with neighbouring houses, namely the Victorian terraced houses opposite.

Hackbridge Square

In the Outline permission this was a community space of 32m x 42m. This would provide the proposed bus interchange and opportunity for farmers' markets, as well as a place of interaction and sociability.

The proposed increase in size of the assisted living block means this space will be lost. An area of landscape has been created in front of the supermarket to offset this loss. As there are no measurements, we cannot assess if this is of equivalent size. We do not believe, however, that it will provide the same benefits.

If anything, this lost amenity space should be added to the landscape proposed opposite the Victorian terraced houses to create a large plaza, where the likes of farmers' markets could take place. This provides the opportunity to save the existing mature trees (or at least one of them) and offer a buffer to the Victorian terraced houses by requiring any building to be built significantly back from the proposed plans.

Retail space

The retail space is being reduced from 2,000 square metres to 948 square metres.

Reference has been made to the empty unit under Saxon House and that the need for retail units is limited because this one has not been let. It should be noted this is Class A2, which is unlikely to be fulfilled in the current climate. The unit also has not been finished off, leaving a poor frontage and lack of evidence of potential opportunity and with a rent that has been over priced for the area.

Hackbridge is a Local Centre and with the arrival of a supermarket provides the opportunity to make it a District Centre. A mix of shops will be necessary to cope with the significant increase in population to the area.

We recognise the revised scheme provides greater flexibility that units can be leased out as a series of small units or one big unit. In the Outline plan it mentions the provision for cafes/restaurants. The current Class A1 mix would not allow for this.

There is however a restaurant planned for under the assisted living block. It has not been confirmed/decided if this would be available for public use. Likewise the situation of a hairdressers in this block that is for public use, directly conflicts with an existing hairdressers opposite.

We would accept some loss of retail space in exchange for quality of spaces and further discussions and surveys are needed to what is required in the area to accommodate the new and existing residents to make Hackbridge into a thriving District Centre.

Car parking

There are three key elements of concern:

- Loss of parking on London Road and on Hackbridge Road due to the need to provide three traffic lanes, to enable safe vehicular access to the site. (See below.)
- The available parking provided for the 725 flats and houses, and the further 80 units in the assisted living block, is not viewed as adequate. The PTAL standard, which reflects the availability of local transport, is flawed. It does not reflect people's requirements and their car use. They will merely bring their vehicles and park them elsewhere in the local area.
- Hackbridge Station commuter parking: Hackbridge is the last station in zone 4 and attracts commuters using cars to access the station. It is at present adversely impacted both on congestion and availability of parking. No CPZs are in place here.

Access from Hackbridge Road

The current proposals for the three-lane highway arrangement, providing a filter lane into the site, will be provided by using land from the footprint of the development. Currently Hackbridge Road, opposite the proposed access to the new development, is used for parking. The principal drivers are either commuters or parents dropping off or collecting children at school. Could you therefore advise what further elements, e.g. parking restrictions, would form part of this intersection?

Access from London Road

The three-lane proposal on London Road should not be at the cost of loss of parking spaces in front of the Victorian terraced houses. Similarly to the access from Hackbridge Road, the three-lane layout should be provided by land from the footprint of the development.

- The east flow of traffic as proposed will move the vehicle flow closer to the Victorian terraced houses, with the attendant loss of amenity, including noise, vibration and in particular pollution. It should be borne in mind that, given the adjacent access to Hackbridge Station, standing traffic is present to accommodate exit of vehicles from Hackbridge Station car park and various commercial outlets.
- The footpath outside the Victorian terraced houses is a well-trodden path, with many members of the existing community of Hackbridge making daily use of it as the most direct route to and from both the railway station and Beddington Park. This pathway is narrow and at busy times it is difficult for more than one person to pass at any one time. By removing the parking available in front of the terraced houses, you are effectively removing a 'safety barrier' which the parked cars provide along this section of the highway. The narrowness and uneven surface of this path, combined with fast moving traffic, poses a significant risk to pedestrians.

Cycle routes

The proposed cycle route is a tick-box exercise and does not propose joining a cycle route through Hackbridge, which is what is needed.

In its application to Sutton Council, Barratt Homes stated:

“2.4 The Hackbridge and Beddington corner Neighbourhood Development Group have produced a draft neighbourhood plan 2016 – 2026 for public consultation in January 2016. The draft plan includes details of the Felnex outline consent and draft policies to include a cycle route through the Felnex development and upgrade pedestrian footpaths along Hackbridge Road along the Felnex frontage. Both of these transport aspirations were included in the outline consent and will be addressed in the reserved matters.”

However, our neighbourhood plan goes further:

“3.18 The character of our neighbourhood will change as a result of the arrival of large-scale developments such as Felnex. All new development should be done with due regard to the existing environment.

“3.21 Consultation has suggested that future development, specifically plans for Felnex, should ensure design and scale of proposed development is more in keeping with the suburban character of Hackbridge.”

Barratt’s proposals meet neither of these requirements.

Trees

Existing trees have never been protected through the demolition phase. They are on the boundary edge and could easily have been incorporated into the design. These are mature trees which have stood here for 60 years or more, and which cannot be replaced overnight.

Large canopy trees need to be planned, for their root care, at the design stage. As it seems six large trees are to be removed, what provision has been made for replacing them, and what space has been allowed for their canopy and their root growth?

Has the applicant provided a landscaping scheme for the site?

The London Plan (paragraph 7.65) recognises the benefit of accommodating trees with larger canopies; it suggests using the advice of Trees and Design Action Group (www.tdag.org.uk) when determining planning applications.

Yours sincerely

HBarrowclough

HELENA BARROWCLOUGH

Chair, Hackbridge and Beddington Corner Neighbourhood Development Group