

**APPENDIX – DRAFT NEIGHBOURHOOD PLAN – PRE-SUBMISSION FEEDBACK VIA EMAIL – CONSOLIDATED JULY 2016**

Plan – Section reference	Comments made by	Comments	Action
	K. Goddall	<p>My main complaint about Hackbridge is the total and complete lack of variety with regard to shops and restaurants. Relatively recently we got a small local Sainsbury's store and most people I know either go to this one or trek into Wallington for the bigger Sainsbury's there, as there's a good selection of fresh food. The smaller Sainsbury's store is a good start however. I'm not expecting it to be on a par with a proper high street but many complaints have been made about the increase in local people which have come with the building of new flats, and not enough decent shops to sustain that population. I don't bother with any shops in Hackbridge apart from the local Sainsbury's and the one Indian restaurant in the area (quite literally the only restaurant, there are no others). Everything else is complete junk - greasy fried chicken shops or local food 'supermarkets' - there are about 4 of these which provide exactly the same limited stuff. Other than this there's a bridal shop, a barber's, hairdresser's shop which I'm not even sure is still running, and I think that's about it. A lot more could be done to attract people, I think. In Wallington there is a large range of shops and it's being improved all the time, but Hackbridge isn't really moving along at all apart from the odd change. It could at least do what Wallington is doing on a more minor scale, we need a much greater variety by this stage of all different kinds of shops and restaurants, not just a limited few that are exactly the same, and extremely specialised ones that barely anyone ever sets foot in. I'm sure you could make many more improvements than you have been doing.</p> <p>Apart from this Hackbridge has a nice community and there are some great places for walks around the back of where I live, along the river. The proximity to London is also excellent.</p>	<p>Comment: We have no control over what businesses open in Felnax, although we understand that owing to the need to provide ventilation, there won't be any restaurants. Coffee shops are possible. The anticipated supermarket might make life difficult for Sainsburys Local.</p>

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Environment policies	T. Canning L. White Seymour Road	<p>Following a review of your draft NDG, which contains many welcome policies and suggestions to the local area, we have the following comments and suggestions. We hope that some, if not all, will be reflected in the final submitted version.</p> <p><b>Visual example of what a green corridor is:</b> Policy EP6 and the map on page 51 suggest creating new green corridors in Hackbridge. It would be useful to see examples of green corridors within the plan and how, if at all, they would impact local residents - who would no doubt embrace them with advance knowledge and involvement on their design and planning.</p>	Further description of green corridors have been added.
Movement		<p><b>Work with Merton Council to plan wider improvements along London road towards Mitcham Junction.</b> The Hackbridge area naturally ends at the junction with Goat Road and therefore the plan only covers this area. Consideration should be made to partner with Merton Council on suggested improvements along London Road to cover the area up to the roundabout past Mitcham Junction station. This would provide a more all-encompassing approach to planning for the local area and provide residents in both boroughs with improved access to facilities and local services.</p>	The plan highlights the need for councils to work together, especially with the move to shared services.
		<p><b>Make reference to traffic signals outside Felnex estate.</b> The report currently makes no mention of the proposed traffic signals outside the entrance to the Felnex estate, which were a key deliverable and included in the recent local consultation. While not explicitly the remit of the NDG, referencing them would help ensure the council don't backtrack on the promise to install them and also mean local residents are kept aware of the plans.</p>	The unfolding New Mill Quarter development will see this realised.
		<p><b>Commitment for better local maps and wayfinding.</b> Hackbridge is a fantastic place for walking, with Beddington Park, Mitcham</p>	Comment: The Action Plan proposes a Heritage Trail. There

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		Common and the Wandle all within a few minutes walk of Hackbridge station. However, many people are not aware of these places, and equally of how easy it is to walk to local churches, doctors and businesses. Introducing better wayfinding, like the Legible London maps seen in Sutton town centre and across London, could help encourage more short trips by foot and help reduce congestion on roads and nearby residential parking.	may be funding for signposting etc from Local Committee. However, it might be better to wait until the station area is finalised before spending money.
		<b>Encourage residents to adopt environmental measures:</b> The plan includes references to supporting local residents by encouraging them to incorporate environmental measures already adopted by BedZed. The NDG should also work with the BedZed architects, local residents and council to help fund and facilitate further environmental upgrades to the Felnex estate to ensure that it remains a beacon of environmental good practice. This will help promote the area as well as further emphasise Hackbridges commitment to be an efficient and cleaner area for all within the greener borough.	Comment: Opportunity to raise these issues was during the Felnex consultation. Sutton is officially a “One Planet” borough, but need local architects and others to make their views known to the Council.
		<b>Push local Borough to support drive for more environmental buses through area.</b> Recently we have seen the first hybrid buses in Hackbridge on the Route 127, which are a welcome edition to the neighbourhood as they can help to reduce pollution. The NDG should, as an association, call on all new (and existing where feasible) bus routes that serve the area to use either Hybrid or electric buses, with special focus on the Route 80 which terminates in Reynolds Close and therefore often waits at the Bus Stand.	Comment: We could include something on encouraging hybrid buses, maybe under Pollution. Is this covered in Local Plan 2031?
		<b>Support restoration and regeneration of Culvers Lodge site through phased work and community planning.</b> The recent consultation on the Culvers Lodge site showed the desire to restore the building. The NDG should support this endeavour and also see whether regular community clean-up programmes to the site could	NDG involved in the Steering Group with the Wandle Valley Regional Park Trust in saving the lodge and creating its future.

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		be initiated to start preparing the area for any potential 'pop-up' which could help generate revenue for the restoration.	
		<b>Relocate awkwardly positioned lamp posts on pavements along London Road and upgrade to LED and solar to reduce impact to local community.</b> This is a problem stated frequently by local residents and simply relocating the poles to the grass verge or to more convenient locations would greatly improve the area. A specific policy on working with the council to address this would be welcomed. The recent relocation of the speed camera on London Road to the grassed area rather than the pavement shows that such work should be physically possible.	Comment: new lights at Hackbridge Corner are LED. The positioning of poorly placed lamp posts has been noted in the plan and Sutton Council should move these.
		<b>Encourage Network Rail to maintain Hundred Acre Bridge and Irrigation Bridge:</b> It was welcoming to see the recent news that the bridges will stay - but that is only half the battle. The NDG should continue to engage with local stakeholders and Network Rail about securing the rights to the bridges for future use. Equally - the NDG should work with Network Rail and Southern Railway to see how the historic framework of Hackbridge station could be further preserved and enhanced to create a station with a more local community look and feel. This could be through historic images, painting in more historic colours or simply ensuring that the structure is preserved in a suitable state for years to come.	Comment: Policy EP1 and CIP1 includes protection of the bridges. Time has run out as Network Rail is set to demolish them in February 2017.  Sutton Council decided not to locally list the railway station – what's needed is someone to investigate its history to demonstrate its value. We have put in the Local Economy section thoughts of what we would like to see in the immediate area incorporating the station, which would obviously need consultation with Network Rail.
	These comments have been provided	Thanks for sending through the draft neighbourhood plan for Hackbridge and Beddington Corner and congratulations on being	

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	B. St Julian Bown in consultation with T. Burton, Chair Wandle Valley Forum	<p>the first neighbourhood plan to reach this stage in the Wandle Valley. We hope more communities will take up the opportunity that neighbourhood planning provides.</p> <p>We welcome the plan and its intent. The plan covers a lot of ground and has much excellent content which recognises the potential of the area. We think it will be a major step forward for the planning policies for this important part of the Wandle Valley.</p> <p>We offer the following observations:</p>	
		<p>1. The mention of a 'Masterplan' seems to apply only to the neighbourhood area rather than the broader vision connected to the Wandle Valley Regional Park and recognising the neighbourhood area is part of a much wider expanse of open land with the potential to become a new Wandle Metropolitan Park stretching from Beddington to Mitcham. We would welcome this wider connection and potential being recognised more directly</p>	<p>The map has been changed to recognise it is for the local Hackbridge area only. Map 6 in the plan shows the wider Wandle Valley Regional Park boundary.</p>
		<p>2. NPD 3.37. the support for an Environmental Centre and its connections to the Wandle Valley Regional Park are welcome. The nature of the centre and whether it relates to space in the new primary school or a separate dedicated facility is unclear and would benefit from further clarification. It might also be possible to combine the facility with other services, such as fishing tackle, in the village centre.</p>	<p>Comment noted and subject to further discussion</p>
		<p>3. NPD 3.67 Is this the primary school in an area "provisionally protected for education" or something else?</p>	<p>This has been updated to reflect that Hackbridge Primary school will be expanding onto the Land North of BedZED.</p>
		<p>4. IDEA. The exemplar of BedZed is an important contributor to the "Wandle Green Valley" concept. This includes not only BedZed but</p>	<p>Comments acknowledged.</p>

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		also Mapleton Rd School (250 solar panels send energy to grid) + methane capture on the Farmlands and even the potential for micro-hydro on the Wandle itself. We would welcome recognition of this wider potential in the final plan	
		5. IDEA. Mill Green concrete channelled river course, could be softened and made an attraction rather than just being concrete culvert - with an option for funding through the Community Infrastructure Levy.	Agreed. Is in the Community Action Plan.
		6. IDEA. The Wandle behind Felnex needs to be enhanced and made more accessible as a route or leisure walk as part of the Wandle Trail. This could again be a focus for CIL payments.	Not viable as Wandle not behind Felnex.
		7. We welcome support for retaining access over the railway to Beddington Farmlands at all points where bridges currently exist.	Noted. We have jointly raised a petition to save the bridges.
	S George New Road	<p>Thanks for the leaflet about the neighbourhood plan. Since the introduction of the ludicrous heart of Hackbridge traffic calming measures I've been to numerous meetings where the council have been told how they got it wrong. I've written 3 published letters to the local Guardian and spoke to Tom Brake about it.</p> <p>The entire thing has cost a lot of money, it's dangerous and it creates a traffic bottleneck daily.</p> <p>This is set to get far worse with the proposed introduction of traffic lights near Hackbridge station. Having cars queued up with engines running due to congestion is not something I want on my doorstep. For that matter nor was an incinerator but there seems little interest in what that's likely to do to our air quality either.</p>	Sutton Council is finally undertaking a borough wide review. We have put in further comments on page 63 of our plan.

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		<p>Your leaflet mentions parking across Hackbridge being a problem. I have heard mention of how introduction of resident parking zones will assist. I would urge caution with this. These are sold to residents on a promise that they will end on street parking by commuters at the expense of residents. It will also allow successive councils to carry on increasing the charge to residents for a permit to park where they may currently park for free. Don't be suckered into this option.</p> <p>The council may not like it but cars aren't going to be uninvented. They offer freedom for many, not just the wealthy. People need to park their cars. Rather than continually making life difficult for residents, commuters and drivers can't the council liberate some space in the forthcoming development perhaps increasing available parking for the station, which has remained broadly the same over the past 30 years.</p> <p>We need new ideas not a constant regurgitation of penalisation to change behaviour. I walk, cycle and drive in and around my community yet my council seem determined to ignore my views and those likeminded, to pursue their own ill thought through agenda.</p> <p>My neighbour, Tracey Collins, campaigned for seasons to get changes made to the crossings at Hackbrige yet they still remain with the dangerous courtesy crossings still in place. The council removed the roundel soon after installation as it didn't work. No apology or acknowledgement they got it wrong.</p>	
	L. Duffield	<p>On the whole I think the plan is good but I have a few suggestions and concerns. Hackbridge station. There have been improvements to access at the station but the huge gap between train and platform southbound has never been</p>	Noted. Network Rail issue

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		addressed. I have brought this up with Network rail and Tom Brake to no avail. It makes the station impossible for the disabled and difficult for everyone else, especially mums with buggies, cyclists and anyone with luggage. I appreciate that changing the whole platform would be expensive but why can't we have one or two raised sections, like they do at some underground stations?	
		Dog poo bins. The distribution of dog poo bins in Hackbridge is mysterious to say the least. There are three in Culvers retreat and three? along the wandle trail ( on your mapped section). The bin inside watercress park seems to have disappeared and the three poo bins that were along the river at durand close have all gone and not been replaced. There is also a bin at Culvers house primary and one at bedzed. It would be very useful to have bins where the roads join the footpaths on the north and south side of nightingale rd at Hackbridge adjacent to Nightingale close. Also at the junction of the footpath and culvers ave, next to the Riverside centre as well as replacing the missing bins.	Noted. Sutton Council responsibility
		Childrens' centres. There are changes afoot in the provision of childrens centres within the Borough. I don't know what the plan is for the future of Spencer rd cc. and Muschamp cc. but I hope the influx of children that will come with the new housing has been catered for in the borough's planning.	Noted. Sutton Council responsibility
		Parking. Parked cars are a nightmare in this area. I live in Ansell grove and on the majority of evenings it would be impossible to get an emergency vehicle up the road. There are often problems with refuse collection and deliveries. The council put bollards up at the	Sutton Council is finally undertaking a borough wide review. We have put in further comments on page 63 of our plan.

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		entrance to the road to prevent parking up on the kerb, but this narrows the access. I wish a better solution could be found.	
		Culvers ave and Otter drive etc. The section of culvers ave that snakes past the new estate is dangerous because of parked cars obscuring the view of the pedestrian traffic from the shop and riverside centre, the bus stop, the cycle path by the river etc. I believe one man has been knocked of his bike already. We need better parking for the riverside centre and probably some restrictions on parking along that stretch. At the very least traffic should be warned to slow right down.	Unfortunately this is out of our neighbourhood area, but suggest this is raised at your Local Committee meeting or your local councillor.
		Driveways. Might it be possible to have some kind of collective buying scheme to encourage home owners to convert to, or install permeable paving if they are going to pave their front gardens for parking. I would love to get rid of the tarmac on my driveway but can't afford a good alternative. Even a good leaflet or a page on your website about how to prevent flooding by thinking about different paving solutions would help.	We agree and SUDs has been mentioned in the plan, especially where conversion of front gardens are concerned.
	R. Watts <b>Living Wandle Landscape Partnership Scheme Programme Manager</b>	Hi there, I've just read the summary doc. Very happy to see the Wandle features as an asset.	
	G. Newman	Well done to your group for what you are doing.	Sutton Council is finally

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		<p>My main concern that Hackbridge will turn into an urban jungle instead of the nice small village feeling.</p> <p>Parking has always been a problem and will probably get worse, mainly due to the Council not managing the company that deals with parking operating properly.</p> <p>We need to ensure that all domestic properties built do provide sufficient parking for them.</p>	<p>undertaking a borough wide review. We have put in further comments on page 63 of our plan.</p> <p>We agree with your concerns about Hackbridge turning into an urban jungle and have previously and continue to raise this as an objection, specifically in relation to planning applications.</p>
	V. Raine	<p>As there are a lot of senior citizens in Hackbridge it would be nice if there was a seat or two on the bridge as a lot of old people like to walk but find it very daunting walking over the bridge.</p> <p>Also with so many people using the railway using the side turnings for parking without any thought for the residents.</p>	<p>We agree that seating would help the elderly to get over what is a steep bridge. Unfortunately we believe that the council would not allow this due to constriction of pavement width.</p>
	P. Alfrey Beddington Farm Bird Group, Ecology park Group and Little Oak:	That all sounds fantastic!	
	C. Mason, Savills, on behalf of Marshridge Ltd	<p><b>General Comments</b> Paragraph 3.8 (Page 14) of the of the pre-submission Neighbourhood Plan acknowledges the importance of ensuring that the proposals for developments are aligned with existing strategic policy for the borough. However, we are concerned that as currently drafted the Neighbourhood Plan is not consistent with the existing or emerging policy framework for LB Sutton as set out below.</p> <p><b>Employment</b> Land adjacent to Hackbridge Station is identified on Map 2 at Page</p>	<p>Our hopes and aspirations for Hackbridge are likely to be significantly different to those of a speculator/potential developer, as their motives are profit and accountability to share holders driven.</p> <p>Leaving that aside, the existing LBS 2009 Local Plan was in place</p>

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		<p>13 of the pre-submission Neighbourhood Plan as an Employment Zone. Paragraph 2.23 of the Neighbourhood Plan refers to just two remaining mixed employment hubs in Hackbridge. One of these is identified as the site adjoining Hackbridge Station.</p> <p>Draft objective 2.1 in the plan states '<i>Protect and support existing employment land use</i>'. The objective goes on to say that employment areas should be retained in traditional B use classes to ensure sufficient opportunities for local employment.</p> <p>Draft Policy LEP1 (Employment Land) of the Neighbourhood Plan states:</p> <p><i>'All development of existing employment land should consider and provide the following:</i></p> <ul style="list-style-type: none"> <li>- <i>Local employment to be provided and sustained on the site, this could include training and apprenticeships.</i></li> <li>- <i>For mixed use developments, provide additional employment opportunities by providing flexible space such as live / work units and or home office space.'</i></li> </ul> <p>We strongly object to the allocation of land adjacent to Hackbridge Station as an employment zone and to objective 2.1 and Policy LEP1. These are not consistent with national or local policy for the following reasons.</p> <p>The site already has an allocation for mixed use redevelopment (see below) in the adopted Site Development Policies DPD and it is critical that this is reflected within the Neighbourhood plan to ensure that it is consistent.</p>	<p>before the Neighbourhood Development Group was formed to produced a neighbourhood plan under the Localism Action 2012. As a result, at no point in our plan are we able to allocate sites. In the case of the land that you are particularly interested in (Land Adjacent to Hackbridge Station), we are not as you state 'allocating' the land, but rather asking for it to be retained in its current use as employment land.</p> <p>You may now wish to take a second look at our Plan, (post feedback from residents and businesses) following much conversation with LBS, we have included in the Local Economy policy section our case study of ideas, thoughts and aspirations as to how we would like to see any proposed redevelopment of this site take into account.</p> <p>As a designated Neighbourhood Development Group, we have the right to acknowledge support or otherwise of proposals for development in our defined boundary area.</p>

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			<p>One of the key basic conditions of producing a neighbourhood plan is to be in general conformity with our local authority's Local Plan. We endeavour to ensure that we manage to do this and will continue to work closely with LBS regarding this site.</p>
Local Economy		<p>Adopted Policy DM41 (Site Allocations) outlines that LBS will grant planning permission for the development of Land at Hackbridge Station as outlined below. Adopted Site Allocation BW13 (Land adjoining Hackbridge Station, London Road, Hackbridge) outlines that the site has a housing capacity of 60 units, based on the London Plan Density Matrix, and sets out the following parameters:</p> <ul style="list-style-type: none"> <li>▪ Retain minimum of 30% of the site area for employment uses;</li> <li>▪ Creating an active mixed use/retail frontage onto the station forecourt;</li> <li>▪ Contributing towards the enhancement of the station forecourt;</li> <li>▪ Remediating the site of any contamination;</li> <li>▪ Taller buildings should be exceptionally designed and respect local context and character; and</li> <li>▪ Ensuring the highest standards in sustainable design and construction are employed to achieve an exemplary low-carbon development.</li> <li>▪ Discussions to be undertaken with the HSE with reference to current storage of liquid petroleum on site.</li> <li>▪ The emerging LB Sutton Local Plan Issues and Preferred Options identifies the site for mixed use redevelopment including housing. Separate comments have been submitted in respect of this consultation.</li> </ul>	<p>We responded to the initial approach from Marshbridge in September 2015. Sadly we have yet to receive any response to the array of questions we asked following both the presentation to the NDG and the follow up public exhibition. As a result, we are unable to comment how Marshbridge complies with DM41.</p>
		The existing LB Sutton allocation for the site refers to retention of	How does this now fit with the

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		<p>30% employment floorspace on the site and it is our view that retention of this level of employment floorspace on the site is not viable. We are therefore concerned at the identification of land adjacent to Hackbridge Station on Map 2 as an employment zone.</p>	<p>emerging 2031 Local Plan which states 40% employment land to be retained, apart from being even more unviable?</p>
		<p>Paragraph 22 of the National Planning Policy Framework makes clear that planning policies should avoid the long term protection of sites allocated for employment use when there is no reasonable prospect of a site being used for that purpose.</p>	<p>Thank you for your reference and interpretation. It could be argued that if a site is actually in use (as in the case of the Land Adjacent to Hackbridge Station) then this is not applicable.</p>
		<p>Land adjacent to Hackbridge Station is occupied by a variety of industrial uses. The number of jobs generated by the businesses is very low with only 30-40 people employed across the site.</p> <p>Furthermore, there is no shortage of this type of employment floorspace in the area, with various industrial/warehousing estates reporting available space. The majority of the existing buildings are outdated and do not meet modern business requirements. It is therefore clear that the existing use of the site is not maximising its potential.</p>	<p>We need to be clear about the interchange of industrial and employment. We have been defined here as an exemplar for sustainable living and our case study, as mentioned earlier makes reference to employment that seeks to realise Hackbridge’s important role in being a major gateway to the Wandle Valley Regional Park.</p> <p>One Planet Living is a flagship policy of LBS and our Neighbourhood Plan is underpinned by the 10 principles. A vibrant community must inevitably include both a mix of employment and residential. Recent regeneration of Hackbridge has seen the loss on a grand scale of</p>

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			<p>employment land.</p> <p>You make no reference to the 2009 Draft Hackbridge Masterplan and this raises concern for us in terms of the viability of Hackbridge achieving Sutton’s much promoted sustainability aspirations.</p>
		<p>The application will be accompanied by an Employment Land Report by Andrew Scott Robertson, which will assess how the site is operating and the demand. The initial findings show that due to the mixture of ages of buildings and, more importantly, the restricted nature of the access, which is incapable of improvement, this location is not seen as a prime destination for industrial occupiers. The London Road (A237) is not seen as a primary arterial road and traffic would aim for either the A23, A24 or A218 for easier access to the national motorway network or Central London.</p> <p>It is considered that employment rents in the area are not sufficient to catalyse the comprehensive employment redevelopment of the site. Redevelopment wholly for employment uses is not therefore viable.</p>	<p>We would like to see this as feel it may be biased towards the wishes of the developer, rather than benefitting the existing community.</p>
		<p>In addition, the current uses combine to give a less than positive environmental impact upon the vicinity. The conglomeration of tired industrial units, yard parking, fencing and outside storage gives rise to a low quality environment. This is not in keeping with plans to regenerate Hackbridge and form a gateway at this important site.</p>	<p>Whilst we agree with the point that the site looks tired, this is not a justification for doing away with the whole use of the site as employment land. We do not know to what extent land ownership has been discussed. Surely the existing land owners need to be consulted and offered appropriate incentives to improve</p>

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			<p>the aesthetics of the area.</p> <p>It should be noted that there are viable businesses on this site.</p>
		<p>For these reasons it is therefore, considered that the site is not suitable to be retained in employment use. In order to reflect LB Sutton’s policies the site should be recognised as a housing zone with some limited employment floorspace.</p> <p>We have considered opportunities for retaining employment floorspace (industrial uses) within the site but it is not considered likely that a realistic contribution to employment use can be accommodated in close proximity to existing and proposed residential units, on what is a constrained site. The significant regeneration benefits of the scheme for Hackbridge seek to outweigh any potential detrimental effects that might be caused by the loss of an outdated employment site that creates a very small number of jobs. If employment generating uses (industrial uses) were to be included, this would not only have a potential detrimental effect environmentally, it would also have a significant effect upon viability as it is doubtful that a commercial rent could ever be achieved for new employment units in this area. In these circumstances the financial viability of the scheme would be threatened and also the provision of affordable housing.</p> <p>The proposed scheme incorporates two commercial units which are considered to provide an appropriate level of employment creation as part of a mixed use scheme and for the reasons set out above, it is not considered feasible to go beyond this level. The proposed commercial uses (B1, D1 and or A3) are considered to be the most compatible with residential provision on the remainder of the site and will create a positive environment for the proposed and existing residential occupiers.</p>	<p>The negativity being employment regarding the existing industrial units on this employment land is not a justification for getting rid of the land as a site for employment use. We would wish to draw your attention to the visionary Cancer Hub recently awarded significant funding and being taken forward by Sutton Council.</p> <p>Our Neighbourhood Plan seeks to provide a platform for ideas and comments from local people, which include the importance of the provision of local employment.</p> <p>Having seen both the Felnex site and Wandle Valley Trading Estate lose out to almost 100% residential, we would be failing in our remit to ensure our Neighbourhood Plan realises one of our key objectives of local employment.</p>

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		<p>The exact amount of employment floorspace will be subject to viability appraisals and should therefore not be specified in the plan.</p> <p>Policy LEP2a (Employment opportunities on and around Hackbridge Station) states that adequate space should be allocated to employment ensuring pressures for residential development do not bias the need for local employment opportunities. In light of the above this Policy is inconsistent with adopted LB Sutton Policies and creates ambiguities moving forward.</p>	<p>Following discussion with Sutton Council, we do not have a policy LEP2a. Please refer to our case study.</p>
		<p><b>Housing</b></p> <p>In order to ensure consistency with the adopted and emerging Local Plan, the Neighbourhood Plan needs to acknowledge that housing is acceptable on the site. The current proposal is for 204 units and this equates to a density of 161 dwellings per hectare (based on a site area of 1.26 ha). This accords with the London Plan guiding density of 45-170 units per hectare for this site. It is considered that the quantum of development proposed is appropriate for the site and is the amount necessary to ensure that the scheme remains viable and should be reflected within the Neighbourhood Plan.</p>	<p>As we have already stated, we are not in a position to do any site allocation. Our stance remains that we would like to see this land retained as employment.</p> <p>Your density figures are noted but seem significantly higher than those mentioned in Sutton’s existing plan where the site allocation shows 60 units. Perhaps this needs further clarification.</p>
		<p><b>Character and Sense of Place</b></p> <p>Draft Policy H&amp;BEP1 (Local character and sense of Place) states that proposals shall respect the scale and density of the suburban setting of the neighbourhood’s buildings, area of special local character and other heritage assets.</p> <p>It is important that this Policy takes into account LB Sutton’s Tall Building Study 2008 (prepared by Gillespies)</p>	<p>Thank you for the points from Sutton’s Tall Buildings Study produced in 2008, as one walks around the whole of the Borough of Sutton, this report is clearly being realised and very little recent build in Sutton is not adhering to this policy.</p>

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		<p>which identifies land adjacent to Hackbridge Station as having potential for taller buildings. The report identifies Hackbridge as one of eight areas for further detailed study before coming part of the Tall Buildings Strategy Plan for the Borough.</p> <p>In considering the appropriateness for taller development section c30 states that:  <i>'The station and surrounding area is highly fragmented and consists mainly of large warehouses and depots with poor linkages to surrounding areas. The area offers the possibility of comprehensive redevelopment on a scale unlike many areas within the rest of the Borough.'</i></p> <p>The report identifies that: <i>'The core of the area surrounding the station is felt to be less sensitive to change, which may include taller development, than many other parts of the borough.'</i></p>	<p>This 2008 report has been overtaken by what Sutton Council is allowing to be built across the Borough.</p> <p>In producing this neighbourhood plan, we have been required to consider the holistic Hackbridge and our major concern here is that the now full speed ahead New Mill Quarter (Felnex site) will deliver a significantly higher density of residential accommodation than anticipated in very close proximity to the Land Adjacent to Hackbridge Station.</p> <p>The use of tall buildings to facilitate further increased density of this immediate area presents no end of potential issues including strain on infrastructure, both in terms of roads and public transport. So while your focus here is on height, ours is on density and impact on existing infrastructure.</p> <p>Again, we raised a significant amount of these points in our response to your client's initial approach to us back in September 2015. We still await a response.</p>

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		<p><b>Summary</b>            We object to the pre-submission version of the Neighbourhood Plan as currently drafted. This will constrain development of this important site and conflicts with LB Sutton’s adopted and emerging policies.            I trust these comments are helpful and I would be more than happy to discuss them with you as and when appropriate.</p>	<p>Thank you for taking the time to respond to our consultation. While not actually one of the stakeholders, we will be including your comments in our consultation statement to support the robust nature of the plan.</p>

### SUMMARY OF FEED BACK FROM INITIAL STAKEHOLDER APPROACH – LOCAL BUSINESS – JANUARY 2016

Organisation and contact name	Section & page no.	Comments/Observations	Suggestions	NDG observations/ comments	Change made to draft plan
D. Warburton Sutton Nature conservation volunteers	Page 21	Legend of map has ‘site of <u>interest</u> for nature conservation’ – the planning term is ‘site of <u>importance</u> for nature conservation’	Update legend	Agreed	Ongoing issue with maps and this will need to be addressed as part of this.
	Page 29 Policy EP1	You say ‘all development proposals shall be required to support improved access including:’ How will this be enforced? S106 monies are now much more tightly applied than they ever were, so requirements aiming to use this are almost certainly destined for failure. CIL may be an option but as far as I am aware, CIL monies are very small at the minute. Ultimately, each developer would need to have a legal obligation to pay monies to ‘a fund’ to contribute to these access works, which may be very difficult to enforce /		Agreed. CIL implications need to be better detailed and explained in our plan. How do we take ownership and ensure it is clear in our plan that CIL contribution is/has been appropriately	Action – look at other neighbourhood plans and see how they have dealt with this.  Also ask Sutton Council to

		apply		allocated to cover continual maintenance/improvement.	update us on CIL and how they view our entitlements as a recognised neighbourhood forum.
	Page 43 5.63	Throughout, you refer to the land north of BedZED as MOL, which is correct. However, it is also SMI (Site of Metropolitan Importance for Nature Conservation). Not all of the aims for MOL, such as increased access, are always compatible with SMI and in particular, Beddington Farmlands, of which the land north of BedZED is part	Modify description to reflect designation that the land north of BedZED is part of wider SMI.	Agreed.	Plan revised to reflect the use of SMI in respect of the land north of BedZED.
	Page 45 EP4	<p>You say 'Consideration of native and non-native species of plants should be used, as it has been proven to extend the season for biodiversity.'</p> <p>The 'season' for biodiversity is an odd turn of phrase, as biodiversity is the sum total of genetic, organismal and ecosystem variation; it therefore can't have a season. Is this conflating 'biodiversity' with the known benefits of some non-native flowers and shrubs to flower visiting invertebrates, extending foraging season?</p>	<p>The term 'consideration' may also be used as a bit of a weasel-word – i.e. developers could, legitimately, say 'we considered a native and non-native mix but instead, went with this generic mix of non-native species' and provide nothing else. It may be useful to try to instil detailed landscaping proposals...</p> <p>Perhaps modify to something along the lines of: 'Planning permission will be given to developments which</p>	Agreed.	Plan amended to insert suggestion regarding native and non-native species of plants.

			clearly demonstrate multifunctional landscaping, utilising a mixture of native and non-native species of plants, to create and enhance wildlife opportunities, as well as providing aesthetic and landscaping appeal.'		
	Page 47 EP4	You say 'All green spaces currently managed by Sutton Council, should consult with the NDG, to ensure that it conforms with the management plan.' What management plan? This reads as though there is an existing management plan for all areas managed by LBS. I agree, a bit more joined up thinking and communicating may be ideal but may be difficult to implement	Provide clarity as to what the management plan is, in the justification	Highlighted a local green space management plan but not adopted by Sutton Council. Ongoing/aspirational.	See Appendix 7
	Page 50 5.89	Government commitments to Zero Carbon homes have been scrapped – this would be extremely difficult to enforce at an appeal		Justification revised to state subject to government policy and at time of writing new legislation will still focus on zero carbon.	Plan amended to reflect this.
	Page 51 Policy EW& WP5	You say 'by giving consideration to the following flood storage and drought resilience measures from the earliest stages of project planning and design:' Again, the risk is that 'consideration' will be very swift!	Perhaps modify to something like 'by providing detailed flood storage and drought resilience measures from the earliest stage of project planning and design, including SUDS, bioswales	Agreed.	Plan amended to reflect this.

			etc.)’.		
	General observation	<p>In all, I think that the ideas you are pursuing, especially in regards SUDS, green infrastructure and improving ecological robusticity are worthwhile and progressive. My worry is that there is little at national level to back this up (particularly if anything went to appeal).</p> <p>There are also policies and justifications where your desires (quite rightly) are high for things like managing ecological areas but there isn’t, as far as I am aware, an underlying infrastructure to manage these and new areas in a better way and relying on developers to fund it may lead to difficulties in securing monies to enact implementation</p>			
G. Dow – All Saints	Conservation/Community and Identity	<p>Churches</p> <p>I may have missed it, but I couldn’t see any references within the draft plan to places of worship and the contribution which they make to the local community. There are three in New Road - All Saints C of E, the Apostolic Church and the Seventh Day Adventists (the last 2 meet in All Saints Centre).</p> <p>All Saints is very much focused on the local community. We hold morning school assemblies and ran two very successful Reflection Space days involving hundreds of pupils from each of Hackbridge and Culvers House primary schools – and for Culvers House this has now become an annual event. Culvers House holds its annual Carol Concert (attendance 130) and Leavers Service in the church. Our Nativity Service attracts around 120 parents and children, with lots of dressing up! And our Christmas Carol service includes such delights as ‘Where Shepherds Watched’ to the tune of ‘Ilkley Moor Bah Tat’!</p> <p>For many years All Saints has written and delivered free to 4,000 homes our quarterly Community Newsletter,</p>		Agreed that reference to churches and community centres are not clearly defined in the plan.	This has been amended to reflect the local area.

		comprising articles on the local area, history, upcoming events and church services. (Since Andrew retired I have been co-editing it with David Goymour, another All Saints member). Other regular community events run by the church include a Fireworks Display (celebrating All Saints Day) and Summer and Christmas Fairs, making excellent use of our Grounds and the facilities of the Centre.			
		<p>All Saints Church Grounds</p> <p>There is no mention of the community resource which are the All Saints church grounds.</p> <p>The first thing which visitors will see when approaching the church are our Grounds which over the past 2 years have been transformed by our dedicated Grounds Team from a neglected wilderness into a beautiful and productive space – with benches and tables, a native hedge, bird boxes, a wildflower area, fruit trees and vegetable beds.</p> <p>The team received a grant from Capital Growth and an award from the National Lottery to obtain essential equipment and plants. Sutton Ecology Centre also provided seeds and advice for our wildflower areas and made a banner for us which is on the fence inviting the local residents to come in and enjoy the grounds.</p> <p>Students from Orchard Hill College across the road visit every week to work there and pupils from a Culvers House school have carried out a wildlife survey.</p> <p>All Saints Community Centre</p> <p>On page 24 section 3.69 the draft plan states “Community spirit in Hackbridge is strong but tends to be</p>		Agreed the grounds are a great source of open space.	Listed on page 19 as a green space.

		<p>compartmentalised, with the two existing community centres catering for distinct groups rather than the whole community”. I’m guessing that the plan has in mind the needs of teenagers and young adults in particular – and I certainly agree that this is missing. The centre does host a number of other activities including a nursery, cheerleaders, dance, games, camera club, karate, Pilates, tai chi, yoga, a weekly lunch club and monthly cinema.</p> <p>In April 2014, with assistance from a grant from the National Lottery, Jacqueline and I established Hackbridge Community Cinema which shows free monthly afternoon films in the Centre, complete with refreshments and ice cream!</p> <p>Hope that gives an idea of the sorts of things that All Saints – Hackbridge’s local parish church – and the Centre across the road – provide for the local community. Hope it doesn’t sound like I’m evangelising – just sharing some of the things we do in Hackbridge.</p>			
Mrs Walford Hackbridge Primary School	2.21 Page 10	This is an extension to Hackbridge Primary School site, not a new school	Hackbridge Primary School will have a split site.	Agreed	Changed
B. St Julian-Bown Wandle Forum	General observations	<ol style="list-style-type: none"> <li>1. There is a total absence of comment on open space</li> <li>2. A complete absence of recognition even in terms of asking about it, of how the emerging WVRP and Farmlands should be addressed as it is a potential economic factor as well as access to open space.</li> <li>3. The recently raised idea of a local masterplan for Hackbridge and the adjacent MOL is also not mentioned.</li> <li>4. How access to the Farmlands is treated so as to safeguard it yet allow access is also not mentioned.</li> </ol>		<ol style="list-style-type: none"> <li>1. Is this a general observation about open space?</li> <li>2. Objective 2.2 addresses potential economic factor.</li> <li>3. Need to incorporate this into plan –</li> <li>4. Agreed, added.</li> </ol>	5.45 added to say managed access is required.

		<p>5. Interface with Felnex - opportunities and risks.</p> <p>6. Signposting the river and Wandle Trail behind the Felnex site.</p> <p>7. Adequate recreational facilities for the young as part of minimising the risk of vandalism on the WVRP</p> <p>8. What are the benefits of Beddington Corner and Hackbridge working together on this.</p>		<p>5. In general or WVRP specific?</p> <p>6. There is no public access to the River behind Felnex. Walks would need to take place to assess this and local residents not happy by an error showing a proposed footpath as an actual.</p> <p>7. We have already covered some recreational ideas which could help minimise vandalism.</p> <p>8The two NDGs are working together.</p>	
S. Morgan CEO Wandle Valley Regional Park Trust	2.1	It is nestled between the River Wandle to the west and the unfolding Wandle Valley Regional Park (WVRP) to the east.	It is <b>IN</b> the WVRP boundary - see the ALGG and the boundary agreed by our Board	Agreed – changes made to reflect Hackbridge is in the WVRP.	
	3.35	The WVRP is a linear park that stretches along the entire length of the River Wandle from source to mouth.	Useful to add a context map - or add as appendix - the ALGG Area Framework 8. The park has a i.6km boundary - or 20	Noted and changed text accordingly. Maps added to plan.	

			mins either direction of the river.		
	Page 41	Will provide a different map		Noted and changed	
T. Nicholls Dunster Way	S7	I particularly agree with the points made in the 'Movement' section. Sutton in general is a national disgrace in terms of its cycling provision and Hackbridge has failed to move forward from its point of considerable potential in a long time. In a number of aspects pedestrians and cyclists fail to be served and more development is needed of the huge potential of the area.			
Private, Percy Road	s4	Fully support			
Private, Percy Road	S7	Good work			
Beddington Farm Bird Group, Wood Street	All sections	Excellent			
D.Tchilingrian Dunster Way	S1	this boundary seems appropriate when encompassing hackbridge and BC			
	S2	I am keen to ensure historical buildings as well and future special buildings like Bedzed are protected and enhanced. new builds must be designed to fit with the historical architecture			
	S3	I want to see sustainable travel and reduced emissions for air quality is essential / access to green spaces and trees again is what is needed. I strongly agree with all proposed aspects of the plan.			
	S4	The vision and objectives are sensible and credible. They speak clearly of what a resident requires			

	S5	It is essential that LB Sutton protect and enhance MOL and other green spaces in Hackbridge and Beddington Corner. Building a primary school on the site is not a prerequisite or green light to build over other parts and halt the country park. The Green space (field by the Pavilion on Bedzed) should be a protected Green Space and not be an education site. LBS needs to enhance green space and healthy spaces for all residents. The proposed policies used to justify greening the environment, air quality and pedestrianisation appear credible			
	S6	I agree with the proposed Community Action Plan			
H. Lee Denmark Road	S3	S3- I think it will help improve the area			
D. Tchilingrian	S7	S7- I think it will improve the area and help the community with affordable housing. I am excited at the prospects of a new area and look forward to hopefully being able to buy a house once able.			
Helios Road	S1	Plenty of valuable insights throughout on the range of areas, summarised in the action plan at the end. Given that funding and resources will be finite, some form of cost-benefit analysis to determine the key priorities is recommended, as is a timeline for implementation. Also, a community champion(s) for each area to oversee the successful implementation of various actions under each heading.			
Helios Road	S2	Interesting background. Hackbridge and Beddington Corner suffer a little from a lack of a defined centre. The London Road/ Hackbridge Road junction with its traffic and parking challenges, and limited choice of shops - mainly take-aways and convenience stores - means that people will travel out of Hackbridge for other local facilities. Feel more recognition of Carshalton/Wallington/Mitcham should be included in the			

		report - what they provide will influence viability in Hackbridge e.g. nearest library/sports centre being the Wescott.			
Helios Road	S3	It would be good to see the proposed plan of how Hackbridge will look in 5 years time when Felnex etc are completed - will further schools be needed for example? How does this fit in with Sutton's long term strategic plan?			
Helios Road	S4	As per S1, lots of good priorities, but linking to the action plan, with priorities and funding should help with moving some of these forward			
Helios Road	S5	As S4			
Helios Road	S6	Good to have this - please see response to S1 regarding priorities. Appreciate 'high level'; the next stage would be to create 'SMART' ...Specific, measurable, achievable, relevant, timed objectives and prioritise the biggest returns on cost-benefit (which may depend significantly on specific funding available). Some details and ideas in the report not covered in the action plan e.g. plans for cycling - have these been parked for now?			
Helios Road	S7	Thanks very much to the NDG for putting this together, a lot of scope covered and many ideas seem to be viable, subject to the necessary planning and finance			
No name or address	S2	Appreciate the need to work around the existing environment. With no available site for a 'market square' adjacent to the London Road/Hackbridge Road Junction, the Felnex site behind Saxon House and opposite Hackbridge Station remains the next option, but this is a little disjointed with the current centre. An alternative option could be to route the existing Hackbridge Road through Felnex to the new junction opposite Hackbridge station. The stretch of road from the 'Hack' bridge to the junction with London Road could be essentially a pedestrianised zone similar to Sutton			

		High St. This would permit street markets, festivals etc currently of limited feasibility in Hackbridge. Other than the Felnax site itself, the other option could be Hackbridge station car park and proposed change of use. Possibility of re-locating car spaces and creating a market square with new retail outlets. Plenty of planning issues for sure to overcome the range of issues. At present, there appear no new retail outlets for diversifying the retail offering in Hackbridge beyond the dominant take away and convenience store offering.			
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**DRAFT NEIGHBOURHOOD PLAN – PRE-SUBMISSION FEEDBACK – STATUTORY BODIES –  
CONSOLIDATED JULY 2016**

<b>Plan – Section reference</b>	<b>Comments made by</b>	<b>Comments</b>	<b>Action</b>
	D. English <b>Historic England</b>	Historic England welcomes the creation of this Plan, which we found takes a positive approach to the built heritage of the area. In our view the vision and objectives for the historic environment in this neighbourhood area are positive, as they explicitly seek to preserve the area’s historic environment and heritage assets. To support the aspirations of the Neighbourhood Plan to conserve and develop the existing qualities of the area, we would encourage you to consider the following suggestions.	
		We would encourage you to update map 9 on page 63 to make reference to the Wandle Gravels APA, and to refer to archaeology in relation to policy CCIP1. This is because the area’s rich archaeological legacy is one of the most significant aspects of its heritage. Investigations looking at the Wandle Prehistoric Landscape and at Roman Agricultural development beside the river have recently, or are currently, being undertaken within this APA. Neolithic flints have been found locally and there	Policy CIP1 (since renamed) has been amended to include protecting the area’s archaeological heritage and including map 10 - the

Plan – Section reference	Comments made by	Comments	Action
		<p>is also expected to be important evidence of the area’s industrial past within the neighbourhood area. This diverse archaeological evidence is in addition to the nationally important Roman Villa site at nearby Beddington, which is a Scheduled Ancient Monument. Further details of these assets and others in and around the neighbourhood area can be found on the Greater London Historic Environment Record (<a href="https://historicengland.org.uk/services-skills/our-planning-services/greater-londonarchaeology-advisory-service/greater-london-historic-environment-record/">https://historicengland.org.uk/services-skills/our-planning-services/greater-londonarchaeology-advisory-service/greater-london-historic-environment-record/</a>).</p>	<p>Wandle Gravels and Wandle Alluvium APAs, kindly provided to us by Historic England.</p>
		<p>We note that policy H&amp;BEP1 promotes good design, in line with the Government’s good design agenda that is set out in the NPPF. We also note that you suggest creating a conservation area around Hackbridge Green (para 3.73). To support these aspirations, we would encourage you to review our guidance on Conservation Area Designation, Appraisal and Management (<a href="https://historicengland.org.uk/images-books/publications/conservationarea-designation-appraisal-management-advice-note-1/">https://historicengland.org.uk/images-books/publications/conservationarea-designation-appraisal-management-advice-note-1/</a>). Were you to undertake an assessment of the character of this area, it would help provide an evidence base to justify any future conservation area designations. It could also help you to draft specific management policies to preserve and enhance potential conservation areas, or detailed design policies to enhance the local character of the wider neighbourhood area.</p>	<p>Thank you for providing these helpful details around creating conservation areas. We will take this advice if residents decide they want these conservation areas.</p>
		<p>Historic England welcomes the proposed use of CIL revenues for the identification and retention of heritage assets, as well as for promoting their understanding and enjoyment as part of a heritage trail. This would be a good opportunity to improve understanding of the local archaeology as well as built heritage. Other neighbourhood forums are considering using CIL revenues to develop assessments of significance for areas they wish to see designated as conservation areas. Similarly, you may wish to consider how you could better reveal the heritage significance of areas such as Hackbridge Green by using CIL revenues to enhance the public realm.</p>	<p>We will work with LBS to better understand how CIL monies can be used in Hackbridge.</p>

Plan – Section reference	Comments made by	Comments	Action
	D. Brierley <b>Network Rail</b>	<b>Bridges</b> Representatives from Network Rail and the London Borough of Sutton have held a number of meetings to discuss the future of Irrigation Bridge and 100 Acre Bridge. The current situation, at time of writing, is that the Council are considering taking on the future costs of Irrigation Bridge and a decision has not been brought to Network Rail's attention. Network Rail is happy to liaise with the Council and the Hackbridge & Beddington Corner Neighbourhood Development Group. However, the Council's Environment, Housing & Regeneration team as well as the Area Renewal team would be a more immediate contact for any updates.	We continue to try and save the bridges, which are due for demolition in February 2017. It has been impossible to get much information or meetings with Network Rail.
		<b>Hackbridge Station and Car Park</b> Representatives from Network Rail and the London Borough of Sutton have held a number of meetings to discuss these sites and potential development opportunities. Network Rail is currently undertaking development feasibility assessments of the sites. Following the completion of these feasibility assessments Network Rail is keen to continue liaison with the council. Network Rail is supportive of the allocation of sites around the station for mixed use development and would be open to further discussion with other site-owners and stakeholders	Please refer to our case study in the Local Economy Policy section. We welcome initial discussions.
		<b>Potential Development adjacent to operational railway land and infrastructure</b> A number of policies within the 'Draft Neighbourhood Plan' are situated adjacent to operational railway land and infrastructure. The NDG and potential developers should be aware of and consider Network Rail's standard guidelines / requirements when developing sites located adjacent to or in close proximity of Network Rail's land, assets and operational railway infrastructure	Noted
	K. Cheese Northamptonshire Sustainable Development Team, <b>Natural England</b>	Natural England welcomes the neighbourhood plan which sets out development management policies which will guide the future sustainable development of Hackbridge & Beddington Corner.  We are pleased to see Policy H&BEP2: Sustainable design for sustainable living, which aims to include suitable storage areas for cycles which will encourage more sustainable travel. We also support the inclusion of new allotments, as well as protecting existing areas.  We welcome the use of roof gardens where space is limited. Natural England is	We are pleased that you agree with a lot of points in our plan. We have also put in references to key documents from your response.

Plan – Section reference	Comments made by	Comments	Action
		<p>supportive of the inclusion of living roofs in all appropriate development. Research indicates that the benefits of green roofs include reducing run-off and thereby the risk of surface water flooding; reducing the requirement for heating and air-conditioning; and providing habitat for wildlife. Please refer to the following link <a href="http://livingroofs.org/">http://livingroofs.org/</a> for further information.</p> <p>Natural England supports Policy H&amp;BEP3: Design for sociability, as it is important that housing growth is supported by adequate provisions of green space, which residents can access for recreation purposes. The provision of green space, formed from a network of key open spaces, green corridors and landscape features offers the potential to deliver multiple benefits for both people and wildlife providing opportunities for biodiversity enhancement and access to nature.</p> <p>Enhancing existing and creating new pedestrian and cycle paths is important to encourage sustainable travel and can have a positive effect on health and wellbeing of residents.</p> <p>We are pleased to see the Environment Policies including local greenspace designation, green infrastructure and management of existing and new sites. It is important that green space and ecological sites such as Beddington Farmlands and The River Wandle are protected. Green infrastructure (GI) can perform a range of functions including improved flood risk management, provision of accessible green space, climate change adaptation and biodiversity enhancement. GI can be designed to maximise the benefits needed for development, such as improving links between communities and promoting sustainable transport, such as walking and cycling routes. For further information on GI, including its economic benefits, see Natural England’s website.</p> <p>Protection and enhancement of trees is important as they form a fundamental part of the ecological network; providing connectivity, creating breeding and foraging habitat and contributing to local landscape character.</p> <p>Proposals may present opportunities to incorporate features such as roosting opportunities for bats, the installation of bird nest boxes and the use of native</p>	

Plan – Section reference	Comments made by	Comments	Action
		<p>species in landscape planting and we would welcome the delivery of priority habitats, as listed in Section 41 of the Natural Environment and Rural Communities Act 2006, contributing to national and local targets.</p> <p>You may also wish to refer to the National Character Areas, which divide England into 159 natural areas, each defined by a unique combination of landscape, biodiversity, geodiversity and economic and cultural activity. The new NCA profiles provide an integrated, locally specific evidence base that can be used for making decisions about the natural environment. The NCAs highlight the significant opportunities in each area and therefore provide a useful planning tool that can help guide the design of projects so that they are appropriate to the locality and deliver the maximum benefits for the natural environment. Hackbridge &amp; Beddington Corner falls within NCA Profile:114 Thames Basin Lowlands.</p>	
	<p>M. Wilcock Planning Advisor</p> <p><b>Environment Agency</b></p>	<p>Overall, we support the proposed plan. The policies proposed within the plan largely support the environmental objectives of the London Borough of Sutton Local Plan and of the National Planning Policy Framework. It's important your plan is informed by the latest environmental and flood risk data. Environmental data sets are available from data share <a href="http://www.geostore.com/environment-agency/">http://www.geostore.com/environment-agency/</a>. The key environmental issues and opportunities concerning the area covered by the plan are:</p> <ul style="list-style-type: none"> <li>▪ Flood risk and climate change</li> <li>▪ Biodiversity and river restoration</li> </ul> <p><b>Flood risk and climate change</b></p> <p>We are generally supportive of the plan, although we would have liked flood risk to be more prominent within the document. Hackbridge is one of Sutton's key surface water flood risk areas. Most of the policies relating to water are centred on sustainable water use, which we support. However there is minimal reference to actions to reduce the risk of flooding, for example Sustainable Drainage Systems (SuDS), rain gardens, green roofs).</p>	<p>We have amended sections of our plan to incorporate more suggestions on flood risk and mitigation.</p>

Plan – Section reference	Comments made by	Comments	Action
		<p><b>Section 4: Vision and Objectives</b>  We would like to see more within the theme of either built environment or, energy, waste and water relating to SuDS and a drive to reduce surface water flood risk. This could be achieved by the retrofitting of SuDS in public areas / parks. Also, mention of reducing fluvial flood risk.  There is mention of wider Sutton policies but, would be good to see a more local drive to reduce the risk.</p> <p><b>Policy H&amp;BEP3</b>  Whilst we generally support this policy, we would suggest this as an opportunity to explore rain gardens as a way of managing runoff from buildings. Integration of other SuDS measures could also be investigated under this policy. For more information on delivering SuDs click below <a href="http://www.susdrain.org/delivering-suds/usingsuds/background/sustainable-drainage.html">http://www.susdrain.org/delivering-suds/usingsuds/background/sustainable-drainage.html</a></p>	
		<p><b>Policy CCIP3</b>  We support the use of Community Infrastructure Levy (CIL) contributions for the proposed uses. We would also suggest schemes which reduce local flood risk could also be listed.</p> <p><b>Climate change allowances</b>  The Flood risk climate change allowances have been revised to reflect the latest climate projections in UKCP09 and wider flood risk research published since 2009. Land use planning decisions should be based on the latest and most accurate climate change data and evidence. More information can be found at <a href="https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances">https://www.gov.uk/guidance/flood-risk-assessments-climate-change-allowances</a></p> <p><b>Biodiversity and river restoration</b>  We are supportive of the aspirations of this neighbourhood plan. While there are good aspirations to ensure that green spaces are maintained for people and wildlife, it would be good to see a few more policies explicitly outlining the need to protect and enhance all areas where possible for wildlife. In an urban setting such as this, every opportunity possible should be exploited to provide some value for wildlife and a policy specifically outlining the need to</p>	<p>We have added schemes to reduce local flood risk and river restoration to our CIL list.</p>

Plan – Section reference	Comments made by	Comments	Action
		<p>provide opportunities for wildlife to thrive would be welcome.</p> <p>There are multiple references to the river Wandle and the need to improve links to it as well as the need to improve how adjacent development interfaces with the river, which we welcome. However, there are no references to seeking opportunities to further restore and enhance the river. The river within this part of the Wandle is still in need of restoration, particularly bankside restoration and in-channel enhancements and we would welcome references to seeking opportunities to restore the river to a more natural status wherever possible. For more information on the benefits of river restoration refer to the London Rivers Action Plan <a href="http://www.therrc.co.uk/lrap/lplan.pdf">http://www.therrc.co.uk/lrap/lplan.pdf</a></p>	
	Dean James <b>Sutton Council</b>	<p>The council has discussed with the Hackbridge and Beddington Corner Neighbourhood Development Group (HBCNDG) the requirements around Strategic Environmental Assessment (SEA) and Sustainability Appraisal (SA). The council notes the absence of a SEA Screening report as part of this consultation. This will need to be discussed further before the Draft Plan is submitted to the local authority to ensure it can be considered sound and legally compliant at examination.</p>	<p>An SEA or screening is not required for the pre-submission phase.</p> <p><b>ACTION:</b> When the pre-submission plan has been updated from feedback, Sutton Council will do a screening to see whether an SEA is required.</p>
1.14		<p>The status of the Hackbridge Charter (2009) is unclear. Officers need to establish whether it is still used by the council.</p>	<p>This has been removed</p>
Intro		<p>The maps in the document that are derived from OS maps need to include the copyright.</p>	<p>This has been actioned.</p>
2.17		<p>The boundary of the Neighbourhood Area, as defined in Fig 1 on the Draft Plan, does not conform to a single administrative / political boundary. As such the population figures are an estimate/approximation. It would be useful to know which boundary was used to arrive at these figures (e.g. was it the Wandle Valley Ward boundary or a constructed area using Super Output Areas?)</p>	<p>Agreed. Perhaps unwise to have just lifted the existing map from 2009 Masterplan and this has caused a number of frustrations! Benefit of hindsight and we should</p>

Plan – Section reference	Comments made by	Comments	Action
			<p>have just used the defined political/administrative boundary.</p> <p>In the case of the figures for population, these were provided to the NDG by Patrick Whitter in the form of a detailed report covering all aspects of Hackbridge specific statistics. I believe this was extracted from the overall summary for either Sutton or more likely the Wandle Valley and based on 2011 Census.</p>
3.12		<p>Whilst the principle of improving the connectivity is supported this may be difficult to achieve in practice for existing estates. These areas are privately owned and would need the consent of the land owners.</p>	<p>Agree. Section 3 of our plan is given over to identifying challenges and opportunities. Not all of these can or will be addressed through this neighbourhood plan but it is important to set the scene.</p>
3.16		<p>The council has updated its Housing Needs Assessment in <a href="#">Strategic Housing Market Assessment</a> (2015) produced by GL Hearn, available in the Local Plan evidence base library. This identifies a need for 3-bed+ family housing for private sale and 1-bed affordable units.</p> <p>The current policy position requires affordable housing to be provided on all schemes delivering 10 or more units with a borough-wide target of 50%. Planning</p>	<p>Sutton Council have been sent a copy of the Hackbridge &amp; Beddington Corner Housing Needs report produced by AECOM. It can also be viewed at Appendix 11.</p>

Plan – Section reference	Comments made by	Comments	Action
		<p>applications submitted in Hackbridge for schemes of 10 or more units will be required to provide affordable housing in accordance with the policy, unless viability statements justify fewer affordable units being provided.</p> <p>The council is aware the HBCNDG have commissioned a SHMA to be carried out at a neighbourhood level. Whilst the council is yet to see this document it questionable how credible this assessment will be on such a small scale.</p>	<p>The question of credibility of a report on a small scale is noted. However we should be reminded that the neighbourhood plan is of a small scale and relates to a specific area.</p> <p>Policy H&amp;BEP4 has been changed since the pre-submission to tackle the specific housing needs for Hackbridge and Beddington Corner residents.</p>
3.17		The table under para 3.17 includes a figure of 54 units against Corbet Close. This is the gross figure for the site and should be amended to reflect a net loss of dwellings here (72 existing flats replaced with 54 housing). This will ensure this figure is consistent with the others in the table.	This has been amended.
3.35		Is the “1.6km” boundary correct and does this refer to just the parcel of land at Beddington Farmlands?	This is the Wandle Valley Regional Park boundary.
3.48		What is the source of the 25% average quoted?	Figure has been removed
3.51		Amy Harris to supply doc	We never received this figure, despite chasing.
3.52		Sutton’s Strategic Flood Risk Assessment (SFRA) was updated in 2015 and is available in the Local Plan Evidence Base Library: <a href="#">SFRA</a> and <a href="#">Appendices</a> . In addition the HBCNDG may wish to consider the <a href="#">LBS Local Flood Risk Management Strategy 2014-2020</a>	Noted

Plan – Section reference	Comments made by	Comments	Action
3.55		The council is aware that Network Rail has agreed to suspend the demolition of the bridges until the autumn (2016) in response to ecological conservation issues. The council welcome this opportunity to have further discussions with Network Rail over the future of the bridges.	Noted
3.56		The redevelopment of the Felnex Industrial Estate includes proposals to create a public transport interchange to improve the co-ordination between the bus routes and transition to other modes.	COMMENT: plans for the former Felnex industrial estate do not improve access to public transport.
3.62		The ERF in Beddington will be closely monitored by the Environment Agency to ensure that it meets the strict emissions criteria set out in the European Union's Industrial Emissions Directive. In the case of NO2 (nitrogen dioxide), the limits at Beddington will be stricter than the European Industrial Emissions Directive limits. Viridor's compliance will be regulated by the Environment Agency on a continual basis.	Good to hear. Air monitoring is still required in Hackbridge.
3.67		The Local Plan Appendices, Map 2.12 and 2.13 highlight the 'Local Equipped Areas of Play' (LEAP) and 'Neighbourhood Equipped Areas of Play'(NEAP). These highlight a deficiency in NEAPs in Hackbridge. Para I25.13 of the Local Plan Issues and Preferred Options doc addresses play space and should be considered by the HBCNDG.	ACTION: amend this paragraph to include proposals of where NEAPs could be developed. Reference play spaces in the future development areas.
3.67		The primary school on the land north of BedZED now has planning permission.	Agreed. The longer this plan goes on in a state of draft transition, the more we will have to update it as a result of being overtaken by events.
3.73		Designation of a Conservation Area in Hackbridge would need to be explored outside of the neighbourhood plan. The buildings referred to in para 3.73 are already protected through a Statutory Listing.	Agreed. Again, this is section 3 and only highlighting challenges and opportunities.

Plan – Section reference	Comments made by	Comments	Action
3.74		BedZED has been assessed, through the Local Plan evidence base ( <a href="#">Proposed Additions to the Local List</a> ), for inclusion on the Local List. Whilst the council consider it met the criteria it has not been recommended for Local Listing due to the objection of the owners/occupiers.	We still need to understand the reasons why. It remains in our plan to see BedZED given recognition for its architectural significance as supported by the Twentieth Century Society.
3.75		Hackbridge Train Station has been assessed, through the Local Plan evidence base ( <a href="#">Proposed Additions to the Local List</a> ), for inclusion on the Local List. The council does not consider the building can meet the criteria for local Listing so has recommended it is not added.	<p>We were told this about Culvers Lodge until a resident put in a significant amount of time investigating the history.</p> <p>We have noted in our plan Sutton Council does not think is warrants local listing, however it is one of the last few remaining Victorian buildings within Hackbridge and we wish its retention.</p> <p>We acknowledge that more investigation into its history may be needed.</p>
4.1		Whilst the vision of making “zero carbon living the norm” is laudable and supported in principle by the council the outcome of the Government’s Housing Standards Review, the introduction of the Infrastructure Act and Deregulation Act, and the Government’s policy statement ‘Fixing the Foundations’ have a number of implications which are likely to constrain the ability of planning policy to deliver this. This is set out in para I31.6 of the Local Plan Issues and Preferred Options	How does this work with the fact that Sutton Council continues to actively promote ‘one’ planet living?

Plan – Section reference	Comments made by	Comments	Action
		document.	
4.2		Objective 4.1 – See comment 4.1 above.	
4.3		Objective 4.2 – What is the justification / evidence for including 36% to 70%?	These objectives have been replaced with one – All new buildings to consider future issues such as climate change and fuel poverty.
5.8		The benefits of becoming a district centre is the likelihood of being able to secure more employment and retail opportunities, greater security for the existing employment and retail units and the possibility of assessing grant funding. The council consulted on Hackbridge as a potential district centre in the previous plan and the proposal is carried forward.	The Council may have consulted about this in their last plan, but the reality is that Joe Public would not be aware of this or the pros and cons.  Hackbridge is being significantly over developed and being moved to the status of a district centre has seemed to allow this.
H&BEP1		I think this policy would be much more effective if it focused on those aspects of good urban design which make a positive contribution to the character and appearance of Hackbridge and Beddington Corner and a ‘sense of place’, having regard to the area’s heritage assets.  Other issues around low carbon buildings, locally sourced materials and supporting local employment in this policy may be better placed in other sections of the Draft Plan.	Changes have been made.
		There appears to be overlap between the 2nd and 3rd bullet points.	This has been amended
		Use of green walls and roofs should also come in under ‘Environmental Policies’?	It is still mentioned in this section but cross referenced to Environment

Plan – Section reference	Comments made by	Comments	Action
			Policy EP7.
		<p>This statement is presumably intended to apply to all policies within the Plan and not only H&amp;BEP1. More work is needed throughout all parts of the Plan to clarify the following:</p> <ul style="list-style-type: none"> <li>• the information which must <b>already</b> be submitted by developers in support of planning applications by reference to the Council’s existing planning policies e.g. Design and Access Statement; Sustainable Design and Construction Statement; Energy Statement (and associated SAP outputs etc), Ecological Assessments, Archaeological Reports, Transport Statements, Travel Plans etc</li> <li>• what information should each of the above documents contain and at what stage of the planning process should they be submitted;</li> <li>• precisely what performance criteria or environmental standards must be demonstrated in order to meet (a) the council’s existing planning policies, and (b) any additional requirements arising from the policies set out in the Neighbourhood Plan</li> <li>• any additional types of information or report which should be provided beyond the scope of the council’s existing LDF policies e.g. provision of One Planet living Action Plan as suggested in Policy H&amp;BEP2 (what is this exactly, is this some kind of an environmental management system?)</li> <li>• the role of pre-application discussions as were carried out for the Wandle Trading estate – in fact this is probably the best opportunity for the local community to influence the design and layout of new developments in Hackbridge in accordance with the aspirations of the Neighbourhood Plan</li> </ul>	Amendments have been made.
		<p>Urban Design Criteria While these are all commendable criteria and useful to steer discussion the HBCNDG have had with developers at a pre-application stage, these are too open ended / insufficiently precise to be of any practical use in determining planning applications. Most if not all of these issues are already covered in the council’s development management policies set out the adopted Site Development Policies DPD. They are also not referred to in either Policy H&amp;BEP1 or H&amp;BEP2.</p>	The Urban Design Performance Criteria is not part of the policy, hence highlighted in a different colour, but creates a list of questions which have been useful when speaking to developers.
H&BEP2		As previous discussed the policy requirements on Sustainable design and one planet living may be better in a more appropriate section of the Plan.	Reference to One Planet Living Action Plan has

Plan – Section reference	Comments made by	Comments	Action
		<p>Encouraging developers to implement a ‘One Planet Living Action Plan’ (i.e. presumably this is a type of Environmental Management Plan designed to managing the environmental impacts of a development) may well be of some value, the most important thing will be for the submitted Design and Access Statement, Sustainable Design and Construction Statement and Energy Statements etc to demonstrate that the proposed development incorporates the principles of One Planet Living as defined in the Neighbourhood Plan and the council’s existing planning policies in the Core Strategy (CS) and Site Development Policies DPD (Sites DPD). It would be beneficial to refer to nationally recognised environmental standards for new buildings e.g. BREEAM.</p>	<p>been removed from this policy</p>
		<p>As previously commented the requirements for ‘cycle storage’ are far too prescriptive and would lead to cycle storage dominating design. In addition the policy currently has no flexibility in terms of rear cycle storage provided in gardens, as it is not always possible to have direct access to the front and would dictate the form of development (would not allow for terraced properties). It is also isn’t clear how far developers are expected to exceed the current standards (i.e. one additional cycle place would satisfy the requirement of the draft policy).</p> <p>The cycle storage standards do not make clear what type of policy it is applicable to. For example, it wouldn’t be possible for conversion of a house into two flats.</p> <p>Requiring wormeries for all new dwellings is not enforceable nor providing screened areas for outdoor drying. If individual homeowners decide to remove these there isn’t anything the council can do</p>	<p>We disagree it is too prescriptive. Cycle storage needs to be easily accessible, especially in terraced houses. Innovative design can easily include this requirement.</p>
		<p>Requirements for allotments are very prescriptive and may not be deliverable on all residential development schemes.</p>	<p>Why prescriptive? Allotments allow for quite a bit of flexibility in what is being asked for, while ensuring the provision of green space is paramount in any new development.</p>

Plan – Section reference	Comments made by	Comments	Action
			This can be delivered.
H&BEP3		This is more about providing the opportunity for community interaction, connectivity and participation in a range of locally accessible activities (not everyone necessarily wants to be sociable). Couldn't designing out crime be addressed here, since many of the design principles involved will be the same?	This is about incidental spaces where interaction occurs ie small squared, neighbours. Quality of urban space between everything.
H&BEP4		The St Ives Neighbourhood Plan, which recently passed referendum, includes a policy to prioritise new homes for local people. The Neighbourhood Plan is now subject to a Judicial Review against this policy. The council awaits the outcome of this JR with interest.	Noted. The Judicial Review was dismissed.
LEP1		<p>The council would like to discuss this policy further in light of the Local Plan Issues and Preferred Options and the current planning permissions. The policy as it stands weakens the adopted position and could lead to the loss of employment areas with little or no return. However, permitted planning applications (Felnex and the Wandle Valley Trading Estate) permit losses above the adopted position. This needs to be considered.</p> <p>The policy isn't clear about which employment land refers to (I presume you mean the former industrial areas that have been allocated for mixed use, and not other employment areas such as Restmor Way where we would not support a loss), what is meant by 'significant'.</p>	The policy has been reworded to make it clearer the NDG does not want to lose employment land.
LEP2		It is unclear what integration within the public realm means? Why? Happy to discuss further.	Noted – removed.
		Bullet three is rather meaningless – Are there jobs that weaken the local economy?	Noted – removed.

Plan – Section reference	Comments made by	Comments	Action
		<p>The policy is currently too broad and does not define what is meant by “adequate space”?</p> <p>What evidence is there to demonstrate a demand for business opportunities relating to cycling, walking, exercise and leisure? If retail opportunities are to be required in this vicinity the council does not consider it the role of planning policy to prescribe the exact type of retail, to the level in the draft policy, that would be supported.</p>	<p>Policies in this section have been reworded. We note the Council does not see itself to be prescriptive on the types of retail. Local surveys produced a list of retail services residents would like to see, along with the aspiration of building on the success of the WVRP.</p>
EP1		<p>How should developers “consider” the requirements of the first bullet point of Policy EP1? Any developments would need to be compliant with the relevant Equalities requirements.</p>	<p>Agree but obviously concern regarding the fallout from Heart of Hackbridge scheme still resonates. Important to flag this up so that developers pay attention to access issues.</p>
		<p>How does the HBCNDG consider that development can contribute towards the retention of the railway bridges?</p>	<p>The bridges are now mentioned in the justification and not the actual policy.</p>
		<p>How does the HBCNDG consider that new development proposals can maximise employment opportunities for local residents? The council’s revised Planning Obligations SPD sets out our approach:  <a href="https://www.sutton.gov.uk/CHttpHandler.ashx?id=23416&amp;p=0">https://www.sutton.gov.uk/CHttpHandler.ashx?id=23416&amp;p=0</a> (see page 24).</p>	<p>The link appears to be out of date. Policy has been reworded.</p>
		<p>The Beddington Farmlands around 90 ha not 182 ha</p>	<p>182 ha the whole site of which 90 ha leased to Viridor.</p>
		<p>No mechanism exists through s106 to secure financial contributions from developers to support improved access to the Wandle Valley Regional Park unless this is required to mitigate the direct impacts the proposed development.</p>	<p>Reference to S106 has been removed.</p>

Plan – Section reference	Comments made by	Comments	Action
		<p>In terms of financial contributions the council can collect monies through CIL or through s106, when directly related to onsite mitigation. Sutton adopted its CIL Levy in March 2014 (in addition to the Mayoral CIL) and is chargeable for new build development (However, any new build, new building or an extension, is only liable for the levy if it has 100 square metres or more of gross internal floorspace, or creates at least one dwelling. There are also deductions for demolition of period of continuous use). The rate of CIL is £100 sq m for residential development and £120 sqm for convenience retail (the CIL rate is non-negotiable), a charge is not levied against any other uses. The council’s Regulation 123 List is a priority list of items that the council wishes to fund through the CIL. This list, published on the council website (<a href="http://www.sutton.gov.uk/cil">www.sutton.gov.uk/cil</a>) already includes open space and the Wandle Valley Regional Park as infrastructure projects.</p> <p>As the Sutton CIL has now been adopted s106 agreements will now be used to secure direct onsite measure to mitigate the impact of a development this includes: affordable housing, private residential amenity space (where site mitigation is involved), public realm improvements (where they are directly related to the development), town centre management/employment initiatives; sustainable transport improvements (where site mitigation is involved), sustainability improvements (e.g. car clubs), heritage assets, and a carbon offset fund.</p>	
		<p>The fact that this forms part of the mayor’s London-wide ‘green grid’ should be mentioned (or perhaps I have missed this).</p> <p>The multifunctional benefits of strategic green infrastructure for climate change adaptation objectives should be covered here.</p> <p>I strongly recommend referring to the Hackbridge Climate Change Adaptation Action Plan (Aug 2011) arising from the GRaBS project</p>	<p>Comments noted. Changes reflected in this policy and referenced in Policy EP7 justification.</p>

Plan – Section reference	Comments made by	Comments	Action
EP2		<p>Mill Green, Watercress Park, Spencer Road Wetlands, Field within BedZED and the Land North of BedZED are all covered by open space designations such as Metropolitan Open Land, Wandle Valley Regional Park, Public Open Space, Urban Green Space and SINC. It is unclear what benefit there would be in adding an additional green space designation that does not offer any additional protection above the existing designations.</p> <p>The Hackbridge Green is the exception to the above the council supports this space being designated in accordance with the draft policy.</p>	<p>The Field within BedZED remains in the plan since it recently had a site allocation against it and needs protecting as a local green space.</p> <p>The Land North of BedZED also remains since its size is dwindling due to building a school. The Basic Conditions Statement also asks how we are protecting MOL.</p>
EP4		<p>The policy considers the ongoing management of public green space. As such the council does not consider this to be a planning policy and should be moved to the action plan.</p>	<p>Due to allocation of green space management to subcontractors, the NDG aims to work in partnership with the stakeholder to ensure optimum management for people and wildlife.</p>
EP5		<p>The policy largely considers the ongoing management of public green space. As such the council does not consider the majority of this 'draft policy' to be a planning policy and should be moved to the action plan.</p> <p>Other parts of the draft policy are not enforceable. For example a new development could provide “hedges instead of fences” but this does not prevent home owners replacing the hedges with fences at a later date.</p> <p>The council considers a policy requirement on how to mow a lawn is too prescriptive and not enforceable in any way.</p>	<p>EP5 has been reworded to be more specific for developers to consult urban green space for wildlife advice documents provided by National Environmental Non Government Organisations.</p>

Plan – Section reference	Comments made by	Comments	Action
		This may not be possible as alternatives may not be available.	This is part of the justification and not policy. It is possible to reprovide onsite and increase with green roof/walls etc.
		The council is not familiar with RPG3	Old reference deleted.
EP7		<p>This policy seems to repeat the requirements of EP5, some of which is not enforceable (see comments for EP5).</p> <p>Existing permitted development rights mean that driveways do not need planning permission if a new or replacement driveway of any size uses permeable (or porous) surfacing which allows water to drain through, such as gravel, permeable concrete block paving or porous asphalt, or if the rainwater is directed to a lawn or border to drain naturally. If the surface to be covered is more than five square metres planning permission will be needed for laying traditional. As such it is difficult to see how the requirement of the draft policy goes beyond this position.</p>	Policy has been reworded to reflect comments.
EW&WP1		<p>This policy as written cannot be applied and needs to be discussed with the council in more detail.</p> <p>The outcome of the Government’s Housing Standards Review, the introduction of the Infrastructure Act and Deregulation Act in February and March 2015 respectively and the subsequent publication of the Government’s policy statement ‘Fixing the Foundations’ in July 2015 have a number of important implications which are likely to constrain the ability of planning policy to deliver the targets, including:</p> <ul style="list-style-type: none"> <li>▪ the withdrawal of the Code for Sustainable Homes;</li> <li>▪ an amendment to the Planning and Energy Act 2008 to delete the clause which enables local planning authorities to require new dwellings to meet energy efficiency standards (hence CO<sub>2</sub> reduction targets) over and above the Building Regulations. However this amendment has yet to be commenced;</li> <li>▪ the Government’s ‘expectation’ that, until such time as the above amendment</li> </ul>	This section has been reworked.

Plan – Section reference	Comments made by	Comments	Action
		<p>is commenced, local planning authorities will not require new dwellings to achieve CO<sub>2</sub> reductions over and above the Code Level 4 equivalent of a 25% reduction compared to the 2010 Building Regulations;</p> <ul style="list-style-type: none"> <li>▪ the Government’s stated intention not to proceed with the zero carbon target, minimum on-site energy efficiency standards or the proposed ‘allowable solutions’ offsetting scheme as previously planned in 2016;</li> <li>▪ the introduction of new ‘national technical standards’ relating to water efficiency (see Issue 33), access and waste through changes to the Building Regulations introduced on 1 October 2015; and</li> <li>▪ a Government direction that local planning authorities should not set out any additional local technical standards relating to the construction, internal layout or performance of new dwellings in their emerging Local Plans.</li> </ul>	
		What is the justification from moving to 70% recycling? What is the rationale for choosing this figure?	This section has been reworked.
EW&WP2		Construction waste is covered in WP6 of the South London Waste Plan DPD. In some instances construction waste can be used to ‘cap’ landfill sites coming to the end of its life.	This section has been reworked.
EW&WP3		This is below the proposed requirement in the emerging Local Plan policy on Climate Change Adaptation. These higher standards in the Local Plan seem to be consistent with the intention of the draft Neighbourhood Plan policy so the HBCNDG should give consideration to using this figure.	This section has been reworked.
MP1		What is the source for the statement “Sutton is rated the second worst borough in London for cycle routes? Is this the quality or lack cycle routes?	<p>Reworded to say Sutton has the highest household car ownership of all the London Boroughs.</p> <p>Source: -  <a href="http://content.tfl.gov.uk/technical-note-12-how-many-cars-are-there-in-">http://content.tfl.gov.uk/technical-note-12-how-many-cars-are-there-in-</a></p>

Plan – Section reference	Comments made by	Comments	Action
			london.pdf
		The pedestrian and cycle paths discussed under the justification for this draft policy are not really planning policy and would be better under the projects section. The redevelopment of Felnax will include new pedestrian paths through the site.	Noted but disagree. Developers are doing bare minimum to achieve satisfactory pedestrian and cycle paths. This is an important policy that clearly links to much of what we see as poor at present in Hackbridge.
MP2		This policy just repeats the intention of adopted policy DM20 'Assessing the Transport Impact of New Development' but without the same level of detail.	Whilst noting Policy DM20 gives an overarching view, we feel our policy is addressing the huge regeneration project that is happening across Hackbridge and concerned the current policy does not adequately address increased demands.

Plan – Section reference	Comments made by	Comments	Action
MP3		<p>The draft policy in the neighbourhood plan is unclear on how this would be measured, what the standards are considered to be and what the benchmark figure is. In any event air quality and noise impact assessments are already requirements under the LDF.</p> <p>The ERF in Beddington will be closely monitored by the Environment Agency to ensure that it meets the strict emissions criteria set out in the European Union's Industrial Emissions Directive. In the case of NO2 (nitrogen dioxide), the limits at Beddington will be stricter than the European Industrial Emissions Directive limits. Viridor's compliance will be regulated by the Environment Agency on a continual basis.</p>	<p>London Borough of Sutton is in an Air Quality Management Area as of 2013, however LBS's Air Quality Action Plan 2013 is not clear about how Hackbridge with its 'A' road is monitored and action taken.</p> <p>As well as monitoring air quality on the busy roads, it also needs to be monitored in respect of an incinerator soon to come into operation and the additional traffic associated with this. The NDG is endeavoring to have some form of monitoring put in place before the incinerator is commissioned. (Section 6 of this plan seeks to apply for funding.)</p>
MP4		<p>The HBCNDG should consider the councils Car Clubs SPD that recognises that it is not viable on schemes below a certain size. As drafted the neighbourhood plan policy in regards of this matter is a bit draconian.</p>	<p>This policy has been amended to say developments of more than 10 dwellings will be required to provide a designated space for a car club car.</p>

Plan – Section reference	Comments made by	Comments	Action
CCIP1		<p>This policy does not really add anything to existing policies of heritage and local character.</p> <p>A number of buildings identified on Map already benefit from Statutory or Local Listing. A number of others have been assessed against the Local Listing criteria (BedZED and the Railway Station) but have not been recommended to be added (please see <a href="#">Proposed Additions to the Local List</a>)</p>	This section has been reworked to reflect only two policies. The map gives an overview of heritage assets in Hackbridge and their current status.
CCIP2		This is not a planning policy. However, the council is aware that Network Rail has agreed to suspend the demolition of the bridges until the autumn (2016) in response to ecological conservation issues. The council welcome this opportunity to have further discussions with Network Rail over the future of the bridges.	Noted but disagree. Advised to put a policy in by the Victorian Society to protect bridges.
		The council already considers infrastructure requirements, through the Local Plan preparation, and collects contributions through the CIL and S106. For example, the council has planning permission for a new primary school in Hackbridge and significant contributions towards health m education and transport was secured through the S106 agreement for the redevelopment of the Felnex Trading Estate.	Noted but disagree. Concerned that during a period of major construction that existing local residents will be significantly inconvenienced and doubt whether existing planning policy will mitigate this.
CCIP3		Arrangements for the receipt and allocation of funding needs to be discussed and agreed.	This still needs discussion.