



**STATEMENT OF COMMUNITY
INVOLVEMENT**

219 - 227

SUTTON HIGH STREET

JANUARY 2021

polity

1. Introduction and background

- 1.1 Polity Communications Ltd ('Polity') was appointed by Reid Homes Ltd to coordinate and implement community consultation and involvement relating to their emerging proposals to regenerate the Argos store site at 219-227 High Street Sutton.
- 1.2 Polity is a community involvement consultancy which specialises in the built environment and has worked with a number of housing developers and housing associations on a large variety of projects since its inception in June 2004. Polity has also worked on a number of town centre/regeneration schemes.
- 1.3 The application site falls within the Sutton Central Ward within the London Borough of Sutton and is located on a popular high street which features the St Nicholas Shopping Centre and a variety of retailers, food & beverage outlets and community services.

Description of proposals

- 1.4 In summary, the works for which planning permission is sought are as follows:
 - The demolition of the existing building at the site; and
 - The replacement of the existing building with a mixed-use development providing three new shop units at ground floor level fronting High Street and 39 new one and two-bedroom homes in a building ranging in height from four to eight-storeys.
- 1.5 The application is defined as 'Major' by Sutton Borough Council as it involves 10 or more residential dwellings.
- 1.6 At the core of the proposal is the intent to contribute to the ongoing revitalisation of the town centre, animate the street through the introduction of new retail units attractive to the market and contribute high quality new homes meeting local needs.

2. Community involvement programme – principles

Guidance on involving the community in pre-application proposals

- 2.1 In the latest version of its Statement of Community Involvement (adopted December 2014), the London Borough of Sutton states:

The Council is keen to ensure that adjoining owners/occupiers, local residents and other interested parties, who may be affected by a proposed development, are adequately informed of proposals and have sufficient time to make representations that can be taken into account prior to the determination of a planning application.

- 2.2 Increased emphasis has been placed at national level on early engagement in the planning process in order to allow feedback to be fully taken on board before planning applications are finalised. This was a key guiding principle of the Localism Act (2011) and the importance of front-loaded community involvement is reinforced by the most recent iteration of the National Planning Policy Framework (2019), which states at paragraph 39:

Early engagement has significant potential to improve the efficiency and effectiveness of the planning application system for all parties. Good quality pre-application discussion enables better coordination between public and private resources and improved outcomes for the community.

The approach followed by Reid Homes

- 2.3 Reid Homes is fully committed to appropriate community involvement in all its development activities and took steps to discuss the content of a pre-application programme with both officers and members of the local authority.

- 2.4 Over the years of working on development and regeneration projects, Polity has developed community involvement programmes which seek to involve residents, businesses, civic groups and other community stakeholders using a variety of methods and channels. These include briefing meetings with community-based groups, design workshops, briefing meetings with elected representatives, public exhibitions, use of social media, the press & broadcast media and the use of websites and other digital media.
- 2.5 Unfortunately, due to the COVID-19 epidemic and the restrictions associated with that public health emergency, Reid Homes had to adjust its approach in relation to community dialogue and consultation. Constraints have equally applied to local authorities in any consultation activities they were undertaking or planned to undertake.
- 2.6 The need to find new methods of engagement was highlighted by Steve Quartermain, the Government's Chief Planner at the Ministry of Housing, Communities and Local Government in his 'Planning Update Newsletter' issued in March 2020, which stated:

We understand that some councils are concerned about the implications of COVID- 19 for their capacity to process planning applications within statutory timescales. It is important that authorities continue to provide the best service possible in these stretching times and prioritise decision-making to ensure the planning system continues to function, especially where this will support the local economy.

We ask you to take an innovative approach, using all options available to you to continue your service. We recognise that face-to-face events and meetings may have to be cancelled but we encourage you to explore every opportunity to use technology to ensure that discussions and consultations can go ahead. We also encourage you to consider delegating committee decisions where appropriate. The Government has confirmed that it will introduce legislation to allow council committee meetings to be held virtually for a temporary period, which we expect will allow planning committees to continue.

We encourage you to be pragmatic and continue, as much as possible, to work proactively with applicants and others, where necessary agreeing extended periods for making decisions.

- 2.7 Polity therefore formulated a programme in conjunction with Reid Homes and its development team which had the objective of meeting best practice in pre-application whilst addressing the constraints imposed by the public health restrictions affecting the country. This was based on tried and tested digital engagement methods which had been deployed as part of community involvement programmes carried out by Polity for many years.
- 2.8 Although now exclusively 'virtual' in nature the COVID-19 adjusted programme sought to ensure that prior to the finalisation of any planning application proposals residents, businesses, civic groups, political representatives and other stakeholders could:
- have access at an early stage to clear information about the proposals and the design process leading to the planning application;
 - put forward their own ideas and feel confident that there was a process for listening to, recording and considering feedback;
 - comment on the design and content of proposals prior to submission and receive appropriate responses from the design team; and
 - get feedback and be informed about the progress of the application.
- 2.9 The community involvement programme was conceived with best practice in mind and with the objective of meeting the expectations of London Borough of Sutton's Council's Statement of Community Involvement in the light of the public health restrictions associated with the COVID-19 epidemic. The process followed, feedback received and the responses from the design team are described in the following sections.

3. Community involvement programme – tactics

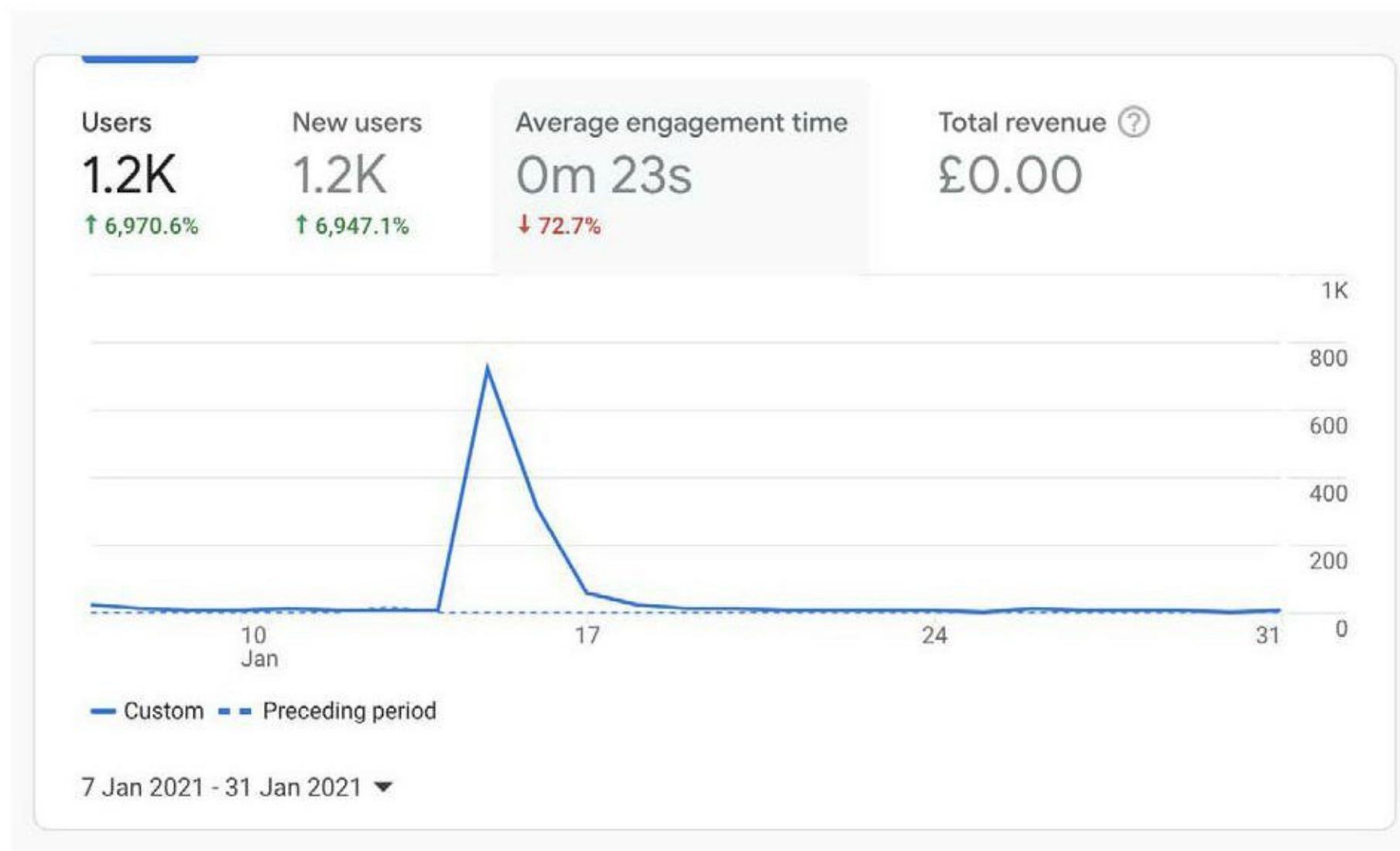
- 3.1 Following the inevitable recognition that physical/face-to-face engagement was not going to be possible due the COVID-19 restrictions, the programme was re-engineered to be virtual in nature.

Consultation catchment and community letter

- 3.2 Publicity for the virtual consultation was by means of a letter (**see Appendix A**) that was hand delivered door to door by Polity’s dedicated street delivery team on 7th January 2021 within an identified catchment area (**see Appendix B**).
- 3.3 This catchment was selected by assessing the site and its locality and was formulated in such a way as to exceed the statutory neighbour notification requirements for planning applications of Local Planning Authorities. Some 350 letters were distributed.
- 3.4 Apart from signposting a website (see below), the letter also included an invitation to a live interactive video presentation via the Zoom platform, which was scheduled for 14th January 2021 (see below).
- 3.4 All local ward councillors (Cllr David Bartolucci, Cllr Richard Clare and Cllr Ali Mirhashem) were also informed about the commencement of local pre-application consultation by email and provided with a copy of the community letter as well as a summary of the intended programme. As a matter of courtesy, we also informed the Councillors from Sutton North Ward (Cllr Ruth Dombey, Cllr Marlene Heron and Cllr Steve Penneck) and Sutton West Ward (Cllr Richard Clifton, Cllr Trish Fivey and Cllr Tony Shields).
- 3.5 Councillor officers were also informed about the commencement of local pre-application consultation by email and provided with a copy of the community letter and the proposed catchment.

Website

- 3.6 A dedicated website www.suttonhighstreet.info was launched on 6th January 2021 to coincide with the delivery of the community letter. This contained a downloadable information document prepared by the architects. The document identified the site location and emerging proposals. The website was subsequently updated with the inclusion of a second information document showing further changes to the emerging scheme.
- 3.7 Following the holding of the webinar on the 14th January, a recording of the session was posted to the website so that people or organisations that were unable to attend could watch it.
- 3.8 As can be seen below from the reports generated by Google Analytics, the website attracted 1,203 users and 5,057 page views during the period from 7th January 2020 to 31st January 2021. Peak visits occurred around one week after the launch of the programme on the back of the in initial community letter.



WHAT ARE YOUR TOP EVENTS?

Event count by Event name

EVENT NAME	EVENT COUNT
page_view	1.5K ↑ 1,067....
session_start	1.3K ↑ 5,954....
first_visit	1.2K ↑ 6,947....
scroll	506 ↑ 932.7%
user_engagement	444 ↑ 652.5%
file_download	99 ↑ 1,314....
click	8 ↑ 300.0%

7 Jan 2021 - 31 Jan 2021 [View events](#) →

- 3.9 The website contained an online contact form which invited users to submit questions and comments. 13 comments were received via the website from local residents and The Sutton Society. These are set out in the following section.

Webinar

- 3.10 As indicated above a live video presentation was held via Zoom on Thursday 14th January at 6.30pm and was advertised by the community letter. Pre-registration was undertaken by clicking a link on the website.

- 3.11 In addition to extending the invitation to local residents and businesses, we also took steps via Sutton Council officers to invite members of the Sutton Local Area Committee (LAC). These invitations were made via email to elected members by us and to other LAC members by officers as we did not have the necessary email addresses.
- 3.12 At the suggestion of Cllr Mirhashem, we also contacted and invited three resident groups to participate in the webinar: The Elm Grove Steering Group (via PPCR, the Independent Resident Adviser working with this group on the future regeneration of the estate); The Benhill Steering Group; and The Collingwood Residents Association.
- 3.13 The webinar attracted only five participants including three local councillors and two members of the public. This is significantly lower than we would normally expect for events of this kind which we advertise in the same way via letter, website and with at least seven days' notice. However, interest in development proposals do vary and are very much related in our experience to the scale of the proposals themselves and the direct impacts on neighbouring occupiers.
- 3.14 The recording of the webinar was made available on the website along with the updated architects' presentation which was used in the webinar presentation.

Conclusions

- 3.15 The programme was promoted through the delivery of a community letter to a wide catchment around the site and transacted online through a website and a webinar.
- 3.16 All of the comments received were considered by Reid Homes and its team.
- 3.17 The following section focuses on the key issues highlighted in the feedback received and gives the response of Reid Homes and its development team.

4. Key issues emerging from the programme

- 4.1 The table below shows the key issues we identified from the community involvement programme. These were gathered from online feedback received via the dedicated website and also from the discussions which took place during the webinar.
- 4.2 As always with development proposals, the reaction of individuals is often shaped by their physical relationship to the development site. This does not in any way undermine the legitimacy or the weight to be accorded to any concerns expressed. Some issues raised with us were not material planning considerations, but this is not unusual with programmes of this kind.

Key issue/question/comment	Response
Feedback from the website	
Will you be providing 50% affordable housing on the site as required by the GLA?	We are currently in discussions with the local authority about maximising the amount of affordable housing. The 50% target you mention is subject to viability.
The mix of housing does not cater for families. Why are there no larger family homes in the development proposals? How about some three-bedroomed flats?	We are in discussions with Sutton's Housing team and they are reviewing the potential demand for 3 bed family properties in this specific town centre location.
The alleyway entrance is not inviting, it is dark and hidden how can you ensure safe access and egress from the building which is well overlooked.	We will be lighting the alleyway to improve safety of conditions. We have also sought advice from the police with a view to achieving Secure by Design accreditation and we have incorporated their comments into the designs.
Housing should be provided by the the Council not to buy or shared ownership or buy to let. We have got enough flats built in Sutton for these people already.	This is a privately promoted proposal not one by the Council. The proposal seeks to contribute to meeting the Council's identified housing needs. Town centres are recognised as sustainable and suitable locations for new homes due to high public transport accessibility and proximity to a range of facilities.
There are already flats built by Sutton Green with space underneath for shops to rent but nobody has taken them.	It is important to have active ground floor uses and this is a key part of the high street. The space has been subdivided into three units (Argos is currently one unit) to attract small/independent retailers. We are confident that this prime high street location will attract occupiers.

Key issue/question/comment	Response
We don't need more flats! People want houses with gardens, so their children have somewhere to play on their doorstep.	There are a variety of housing needs in Sutton and there is a clear demand for apartments. The proposals incorporate a garden terrace.
What about parking - many people have to use cars and can't cycle or walk or use public transport. Where do disabled people park their scooters and charge them up?	<p>This is a zero-parking proposal which is justified by its highly sustainable location in transport terms. New residents will understand from the outset that no parking is offered, in common with other homes in the town centre.</p> <p>We have undertaken an assessment of locally available blue badge spaces and this will be addressed in a Travel Plan to accompany the application.</p>
For every block of flats built existing residents are punished by losing parking spaces or having CPZ schemes put in because too many people have been let into the borough without the infrastructure to support it.	<p>On-street parking is public highway and its control can only be achieved by CPZ schemes.</p> <p>We have undertaken an assessment of locally available spaces and this will be addressed in a Travel Plan to accompany the application.</p>
The council are only interested in the extra revenue they get from the Council Tax.	This is not a planning matter.
Excellent proposal and much needed redevelopment of this part of the high street. Having people living on the high street will help in repurposing retail areas that will struggle in the online world. We need more of this kind of redevelopment.	With the growth of online shopping, most of the latest thinking about the revitalisation of town centres is based on introducing new residents into them. This will bring increased spending power that can benefit retailers and the food & beverage industry. It will also offer the potential to provide a nighttime economy.
I am completely in favour. I live a 5 min walk away and think the proposals are good. The architecture as the site stands is poor; your plans will regenerate a tired plot and make it pleasant.	It is agreed that the existing building offers very little to the townscape. The objective is to introduce high quality design.
What a load of rubbish, you are supposed to be regenerating the high street not more housing. Surprisingly no car parking in the new development!	New homes and the introduction of new residents with their spending power is a recognised regeneration strategy. High streets dependent purely on retailing are shown to be declining. Mixed uses are key. Please see above for comment on car parking.

Key issue/question/comment	Response
We have enough flats around the High Street it is getting ridiculous the amount of planning permission given for new flats. Our shops are disappearing fast where has the lovely town that I moved to gone, please no more flats.	Please see above for response on the need for new homes and also how high streets and retailers can be supported in a changed economy where online purchases have substantially increased.
The plans for this should keep in with the level of surrounding buildings and no more. Also, the design is just ugly brick cheap.	The Design and Access Statement makes the case for the proposed heights and why they sit comfortably within the surrounding townscape. The design and materials propose are high quality and seek to transform a site which is visually unattractive and offers little in design quality.
No more flats in Sutton until 95% occupancy of current new builds.	This is an unenforceable planning condition and also would be a barrier to the Council meeting the targets for the delivery of new homes as set out in the Local Plan.
Where is the parking provision for all these new flats?	There is no provision – please see above. This is a very normal arrangement for developments of this kind in the heart of town centres.
I live in flat very close to ASDA as you are aware, we are all working from home and I would be very concerned about the noise this demolition and building work would create. I have to carry out complex work and virtual meetings at home and would be concerned that the work would disrupt. There is already a lot of lorries using ASDA yard which causes a lot of noise at night again I would be concerned about his increasing, where would all the equipment be stored and parked for the works, there is already a very limited one-way system in place which is halved due to social distancing. I would be worried this would create more traffic/ lorries and pollution, my flat already shakes with the current traffic, I am already woken up early hours of the morning with ASDA yard deliveries I would not want an increase in any of this.	The proposals will have a Construction Management Plan which will seek to minimise any disruption to nearby residents. There are also likely to be planning conditions that will limit working hours. Reid Homes aims to be a considerate constructor and will also use efficient construction techniques that will limit build time (estimated to be 12 months from demolition to completion).

Key issue/question/comment	Response
<p>This proposal to redevelop the Argos site was discussed by the Sutton Civic Society in general meeting on 27 January 2021. Whilst we have no objection in principle to the redevelopment of the Argos site, this proposal is not acceptable because: the height of the proposed building (which is 9-storeys, rather than 8 as indicated on the website) is far higher than the 2 - 4 storeys within the API area set out on page 39 of the Sutton Centre Masterplan – and 90% of the site is within the API area. In addition, in the Masterplan, the area around Elm Grove is predominantly lower building heights and if this proposal were to be approved, it risks setting an unacceptable tone of higher buildings for that area.</p>	<p>We have included an assessment of Townscape impact in the Design & Access statement where we have sought to demonstrate the suitability of a building of this height which has been developed to respect the Town Centre character specifically related to the High Street. This has been discussed and developed in response to consultations, pre-application meetings and design review panels, which has included discussion on this point, to develop proposals for a building that works with the context and can make a positive contribution to the Town Centre.</p>
<p>The jagged gable-ends are overly prominent and with protruding a sharp angle into the building line at every side, they clash with the streetscape and are wholly out of character (acknowledging that the existing building is also out of character in a less dramatic way) – the top of the building should be sloped back to avoid clashing with its adjacent and opposite buildings.</p>	<p>We have developed the design further following further feedback received through consultation to address issues such as these and improve the proportions, façade treatments and stepping of the building on the upper levels.</p>
<p>The lack of a basement and the reduction of the commercial space to a single storey impacts on the viability of the use of the space for a retailer with a similar offering to Argos.</p>	<p>The retail sector is changing and there is an increasing requirement for smaller units rather than large shops such as Argos. This also creates more potential for smaller local businesses and envisaged in the Local Plan for this part of the High Street.</p>
<p>It is welcome that patterned brick-facing is to be used, but we consider that greater creativity could be used at ground level to enhance the streetscape, for example with glazed bricks as has been proposed for the Prince Regent redevelopment. There appear to be no proposals to improve the public realm or to improve the streetscape beyond the development itself, which is a shame – particularly as the alley between Argos and Asda is identified in the masterplan as a “gap site for activation”.</p>	<p>We have been developing the treatment of the alleyway and this is represented and explained within the Design & Access Statement in terms of both visualisations of the area and within the Landscape section. The intent is to open this alleyway slightly which both allow a space to open up to the High Street and improve the aspect of the alleyway.</p>

Key issue/question/comment	Response
<p>A single pedestrian access appears to be offered only from the alleyway, which is not ideal.</p>	<p>The alleyway is not currently a through route and these proposals cannot address that issue. These proposals seek to create an improved environment and to address any concerns related to security.</p>
<p>The question of vehicular access for the development and vehicular access for residents' deliveries is not addressed. At present, there is no on-site parking, access at the rear is a gated yard for commercial deliveries only and the access at the front is a pedestrianised part of the High Street between gates. It is assumed that residents will want access to a vehicle, even if they are discouraged from owning one. The developer should in our view be required to contribute to the provision of a car-club electric vehicle space and charging point in close proximity to the development, perhaps on St Nicholas Way.</p>	<p>There is a travel plan and transport assessment included with the planning submission to address some of these issues. Access arrangements are summarised in the Design & Access statement. We are happy to discuss the suggested approach to an electrical vehicle charging point.</p>

Key issue/question	Response
Feedback from the webinar	
The current Argos site has little to recommend it in design and architectural terms.	Agreed.
The High Street frontage scale appears to work well.	Noted.
The provision of a garden terrace is welcome in terms of amenity/playspace and also outdoor space for people who may be working from home.	Noted.
The proposal respects the architecture found in the locality.	We studied local buildings before producing the scheme to ensure that it was consistent with architecture and materiality locally.
Commercial space welcomed. This appears to have a good relationship with the residential units above.	This is key to ensure the animation of the high street frontage and complement neighbouring uses.
The top part of the tallest rear element works well. It creates interest.	Much work has been undertaken on this and it has evolved over time. Adjustments have been made to materials and windows to arrive at a richer, better articulated building.
Could something be done with materiality or the introduction of landscaping to improve the interest of the blank flank wall?	We have developed some approaches for this. Planting can be used but there are limitations to the extent due to issues around maintenance and access. As such we have improved designs by adding relief details in the brickwork.
This part of the High Street very much serves a local use, serving local people.	Noted and the sizes of the proposed retail units could facilitate local or independent shops that would serve that local market.
The local use of this part of the High Street is underpinned by alleyway access which means it is easy to reach. A safe and well-lit environment is important here.	The alleyway adjacent to the building does not give access to anywhere but we will be providing a well-lit and overlooked environment to this alleyway. We have also opened up the alley at the High Street end to create a more open and visible environment.
Need to address the needs and interests of new residents in the town centre which tend to reflect a younger demographic.	Noted and agreed.

5. Conclusions

- 5.1 The community involvement programme for the development of 219-227 Sutton High Street was conceived with best practice in mind and with the objective of meeting the expectations of the London Borough of Sutton's Council's Statement of Community Involvement whilst taking into account the public health restrictions associated with the COVID-19 epidemic.
- 5.2 The programme employed virtual communications channels as well as notification by a door-to-door letter drop to an identified catchment around the site. We also made contact with a number of residents' groups as suggested by the local authority.
- 5.3 The number of visits to the website was good, meaning that local people and businesses were able to get a good understanding of the emerging proposal. Whilst the feedback we received from the virtual programme was at the lower end of the scale in terms of numbers, we feel that key issues were aired and we were able to pick up a number of comments on the scheme.
- 5.4 As with all programmes of this nature, there were varying views expressed on the proposals from those who welcomed the emerging scheme to those who felt that it might lead to adverse impacts on matters like on-street car parking.
- 5.5 All of the comments received during an approximate two-week programme have all been reviewed by Reid Homes and its development team and responses to key issues have been set out in this document.
- 5.6 Reid Homes and Polity would like to express our thanks to all the individuals which participated in the community involvement programme. The feedback received greatly assisted Reid Homes and its design team in the interrogation of the emerging proposals and now reflected in the planning submission.

APPENDIX A: Community letter



polity

Public Affairs

Level 1,
Devonshire House,
One Mayfair Place,
London W1J 8AJ

T: 020 7242 0170

7th January 2021

Dear Resident/Neighbour,

NEW DEVELOPMENT PROPOSALS AT SUTTON HIGH STREET

I write with details on how you can find out more information about new development proposals at 219-227 High Street, Sutton, which is currently occupied by Argos (site shown in the photograph above). The draft proposals involve the demolition of the existing building in its entirety and its replacement with three new retail units at ground level and some 39 new residential units above.

Due to the COVID-19 pandemic we are unable to hold a local public consultation event, so we have launched a website www.suttonhighstreet.info where you can find out more. You can send us comments, ask questions and register for a live video presentation (webinar) to be held at **6.30pm on Thursday 14th January 2021**.

Join our Webinar on 14th January at 6.30pm to find out more!

It's very simple to join in. Visit www.suttonhighstreet.info and click on the link there to register. You'll need to have the Zoom app on your computer, tablet or smart device – please go to <https://zoom.us/download> if you do not already have this.

We're keen to answer your questions and you can either send these in advance to consultation@suttonhighstreet.info or ask them via the chat facility during the webinar itself.

If you are unable to access the information online, you can contact me or my colleague Lee Jameson on **0207 242 0170** or by emailing consultation@suttonhighstreet.info

Yours sincerely,



Martin Hughes
Director

Find out more at www.suttonhighstreet.info

APPENDIX B: Consultation catchment for community letter

