

11th March 2019

Representation with regard to: 19/00226/FUL

Land to the rear of 79 Thames Street, Sunbury-on-Thames, London, TW16 6AE

FAO Case Officer, Ms Susanna Angell.

Dear Ms Angell,

This representation relates to the application for the construction of 3 x 2 bed houses at the rear of 79 Thames Street and should be viewed as an objection to the proposal for the following reasons:

Conservation Area

Policy EN6 (Conservation Areas, Historic Landscapes, Parks and Gardens) states that the Council will seek to preserve and enhance the character of conservation areas by: (c) encouraging private owners to carry out appropriate improvement to buildings, trees and other features, including open spaces, views and vistas, which are important to the character of the area”.

In researching the revised Lower Sunbury Conservation Area report 1992 (para 2.12) it is noted that the area of the site is given special mention: “The old passageways of the Butts and the Old Rope Walk form an important element of the character of the area. They still provide important pedestrian routes today. Many old brick walls remain along these passageways around Sunbury Park and these are an important characteristic of Lower Sunbury Conservation Area which should be preserved.”

This Association fundamentally disagrees with the sentiments expressed in the applicant’s final paragraph of the Design and Access statement which claims: “The proposals represent an example of a high quality domestic architecture which does not resort to pastiche or mimicry to ‘blend in’, but which reflects and extends the language of residential buildings in this beautiful part of the world in a way which is also relevant to contemporary patterns of living”. It is commonplace for developers to introduce words such as ‘pastiche’ or ‘mimicry’ and to attribute a pejorative meaning to such terms with intention of deterring those who would seek to preserve the essential elements of conservation. Aesthetics in architecture and, in particular, where the proposals are not coherent with the local vernacular will always prove contentious and this proposal is no exception.

Conservation isn’t about preserving everything in aspic, it’s about preserving the character of an area; otherwise there would be little point in having a conservation area in the first place. It is our contention that this terrace of three box-like structures with flat dormer roofs manifestly fails to embrace the essential elements described in the preamble to Policy EN6, to wit: “A Conservation Area is defined in law as ‘an area of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance’.” Indeed, notwithstanding the protection afforded by a Conservation Area, this proposal, arguably, would be unlikely to succeed in an area not so designated.

Parking and Access

In the recent, proximate, application 17/01376/FUL for 3 flats at 79A Thames Street the planning officer accepted that *"In terms of parking provision the Councils Parking Standards require 6 spaces"*. She went on to say *"It is also relevant that the parade of shops in The Avenue is located in relatively close proximity"*. This comment by the PO implied that there is sufficient space in Avenue Parade to absorb the parking requirements of the new flats (a contention disputed by residents). According to the Supplementary Planning Guidance on parking standards (2011) The addition of 3 x 2 bed houses would require a further 5 spaces, making a total of eleven altogether. Both shoppers and retailers at the bottom of the Avenue would attest to the paucity of available parking as things stand today. The numerous pubs and restaurants combined with year-round productions at the Riverside Arts Centre means that the Orchard Meadow car park (the proposed facility disdainfully suggested by the applicant in his Site Analysis) and Avenue Parade are frequently fully subscribed in the evenings. It is noted that it is the same out-of-town developer in respect of the recent approval for the 3 flats at 79A Thames Street is also the applicant for this proposal. One is bound to ask whether, had both applications been submitted simultaneously, the planning officer would so easily have forgiven the absence of eleven parking spaces! A cynic may well conclude that there would be a greater likelihood of approval if the two applications were to be staggered with scant regard being given to the cumulative impact of both developments. It should be noted that illegal and dangerous parking in The Avenue close to the junction with Thames Street in the evenings is already the subject of ongoing and repeated entreaties by this Association to the Council's enforcement arm.

So far as access is concerned, the Site Analysis of the Design and Access Statement states: *"The path would provide access to the proposed new dwellings"*. It is otherwise silent on the means of access and egress for trades vehicles, emergency service vehicles, council refuse services and the like. Whilst the building of houses facing a footpath are not without precedent, most were constructed prior to the introduction of the motor car (School Walk comes to mind and these are mid-Victorian semi-detached with side-facing front doors and room enough for bicycle storage without the need to go through the front door). It seems that the applicant is implying that the path could double up as a road when necessary. In this connection we note that: *"The applicant is advised that Rope Walk to the west of the site is a public footpath and should not be used as a means of access to the highway or for the parking of construction vehicles"*. (Extract from the planning officer's Informatives to applicant in previous application 17/01376/FUL).

It is also noted that Planning Policy guidance Note 3 (Housing) states: "homes with large back gardens are a common feature in many urban, suburban and village areas. Sometimes it may be acceptable to develop back gardens for new housing which is in keeping with character and quality of the local environment. Where development of back garden or backland is allowed it will require careful planning. **For example, there must be proper means of access which is convenient and safe for both drivers and pedestrians and adequate provision for car parking**" (my bold).

For the reasons outline above this Association urges you to recommend refusal in respect of this application.

Yours sincerely,

Paul Thompson,
Hon. Chairman, Lower Sunbury Residents' Association (LOSRA),
12, Brakenwood, Sunbury