



London Borough of Sutton
Local Plan

Issues and Preferred Options Consultation (Regulation 18)

July 2024



**Local Plan: Issues and Preferred Options Document (2024)
Regulation 18 Consultation Draft.**

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Chapter One: Introduction to the Local Plan

Background

What is a Local Plan?

- A.1** The Sutton Local Plan is a development plan document and is part of the Government's planning policy system, which was introduced by the Planning and Compulsory Purchase Act in 2004.
- A.2** The purpose of the Sutton Local Plan is: a) To set out and deliver the Council's long-term aims and aspirations for the borough; and b) To provide a consistent basis for deciding planning applications. It deals with subjects such as: tackling climate change, major new regeneration areas, new housing, retail, office and industrial development, infrastructure provision, the protection of green space, character and design and transport. The plan will cover the period from 2024 to 2041.
- A.3** As part of the preparation of the Sutton Local Plan Review, this document has been produced to set out the issues and options and any preferred policies the Council may already have for public consultation. The consultation will run from **Thursday 25th July 2024 to Thursday 12th September 2024** and how to respond is set out on Page 9. Following this consultation, responses will be considered and a draft Sutton Local Plan will be prepared, published again for public comment and then submitted to the Planning Inspectorate for an Independent Examination. If the Sutton Local Plan is found sound, the Council will adopt the plan.
- A.4** Once adopted, this document supersedes all the policies in the Sutton Local Plan (2018). It does not supersede the South London Waste Plan (2022), produced with the London borough of Croydon, the Royal borough of Kingston upon Thames and the London borough of Merton, which will remain in force to the end of its plan period in 2037. The Local Plan will also set the strategic framework for any neighbourhood plans.

Figure A1: Sutton in a Regional Context



What influences a Local Plan?

A.5 While one of the purposes of a local plan is to set out and deliver the Council's aims and aspirations for the borough, the Council could not start with a blank piece of paper and unconstrained options. The principal influences on the Sutton Local Plan are:

Principal Influences on the Sutton Local Plan



- **The National Planning Policy Framework (NPPF)** - This is the Government's statement for national planning policy. To be found sound at Independent Examination, a local plan must comply with Paragraph 35 of the NPPF, which states a local plan must be (a) positively prepared to meet objectively assessed need, (b) justified by following the most appropriate strategy and evidence, (c) effective, in other words the plan should be deliverable and (d) consistent with national policy.
- **The London Plan** - This is the Mayor of London's statement on London planning policy. Its policies are considerations when deciding planning applications submitted to the London Borough of Sutton. A local plan must be in 'general conformity' with the London Plan, according to Section 24 of the Planning and Compulsory Purchase Act 2004.
- **Duty to Cooperate** - The Duty to Cooperate is a legal requirement on the Council to engage with neighbouring authorities and certain major public bodies and infrastructure regulators to ensure strategic cross-boundary and regional needs are catered for, where appropriate and possible.
- **Sustainability Appraisal and Habitats Regulations** - These are both European directives which have been transposed into English legislation and retained post Brexit. The Sustainability Appraisal is a check that a Local Plan will achieve economic, social and environmental benefits and that any harm caused is mitigated by other factors. The Habitats Regulations consider the protection of European nature conservation sites.
- **Changes to Permitted Development and Newly Arising Issues** - A local plan needs to reflect changes in national legislation regarding planning, which is

increasing the number of developments that can take place without needing full planning permission. Lots of schemes can now take place through ‘prior approvals’ (where the Council assesses potential development against a limited set of criteria) and permitted development (development where no planning permission is required). A local plan should also take account of newly arising issues which occur as a result of social changes, such as household growth and the over-provision of certain land uses, the long term impact of covid and working from home, which has impacted on the demand for office space and the need to protect land uses which add to the general quality of life, such as green space.

- **Council Priorities** - The Sutton Local Plan must support the Council's overarching Corporate Plan ‘Ambitious for Sutton 2022 to 2027’:
<https://www.sutton.gov.uk/ambitiousforsutton>
- **Public Consultation** - Councils are legally required to consult certain bodies and other bodies and persons they consider relevant and to take their representations into account.
- **Monitoring of Existing Policies and Development Management Feedback** - The Council produces a monitoring report annually which analyses how its planning policies are performing. The Council has used the results of this analysis to inform policy: [www.sutton.gov.uk/w/authority-monitoring-report-amr`](http://www.sutton.gov.uk/w/authority-monitoring-report-amr)

Supporting Documents

A.6 In addition to the Local Plan, the Council has also produced two principal supporting documents, which are:

- The Sustainability Appraisal
- Proposed Changes to the Policies Map

A.7 The Policies Map is a visual interpretation of a Local Plan and defines the boundaries for various land uses and proposed policies.

Evidence Base Documents

A.8 In order to ensure that the Local Plan is realistic, the Council has produced a number of evidence base documents on a variety of topics. These are publicly available on the Council's website and include:

- Strategic Housing Market & Local Housing Needs Assessment
- Employment Land and Economic Needs Assessment
- Town Centres and Retail Needs Assessment
- Net Zero Carbon Study
- Housing and Economic Land Availability Assessment
- Five Year Housing Land Supply
- Sutton Town Centre Masterplan
- Tall Buildings Study
- Infrastructure Study
- Green Belt and Metropolitan Open Land Review
- Open Space Study
- Sutton Town Centre Health Check
- District Centres Health Check
- Local Centre Health Check

- Character Study
- London Cancer Hub Development Framework
- Gypsy and Traveller Need Assessment
- Locally Listed Buildings

A.9 In addition to studies produced by the Council, the Council has used studies produced by the Greater London Authority and other public bodies, such as the Office for National Statistics, Greater London Archaeological Advisory Service and Greenspace Information for Greater London CIC. The supporting documents are available to view at www.sutton.gov.uk/localplan.

Consultation

A.10 The consultation on this document, the Proposed Changes to the Policies Map and Sustainability Appraisal runs from **Thursday 25th July to Thursday 12th September 2024**. Consultation will be carried out in accordance with the Council's adopted Statement of Community Involvement (2024).

A.11 Representation should be sent to planningpolicy@sutton.gov.uk or to The Planning Policy Team, Sutton Civic Offices, St Nicholas Way, Sutton, SM1 1EA. Alternatively, comments can be submitted via the Council's consultation hub: <https://sutton.citizenspace.com/>

A.12 All consultation responses will be published on the Council website but personal data will be omitted.

Chapter Two: Challenges, Vision and Objectives

Background

B.1 This section sets out a snapshot of the London Borough of Sutton, taken from the Council's Authority Monitoring Report (AMR). From the snapshot, six key challenges have been identified. These key challenges provide the focus for the vision and objectives of the emerging Local Plan Review.

Sutton Snapshot

Sutton's Community

- The population is increasing (+10.2% between 2011 and 2021 to 209,600 people).
- The population is ageing (+16.8% in residents 65 year old or more between 2011 to 2021)
- Over the next 10 years to 2031, ONS projects that the population will increase to 214,403 persons (+2.3%).
- The number of households is increasing (+3.3% between 2011 and 2021 to 82,351 households).
- The number of single-person households is decreasing (-6.5% between 2011 and 2021).
- Life expectancy is slightly increasing (+0.7% increase for males and +0.2% for females between 2010 and 2020).
- Birth rates are falling (-13.3% between 2011 and 2021), in contrast to increasing birth rates when the current Adopted Local Plan was prepared.
- Crime is increasing (+8.5% increase since 2018-19) compared to a decreasing rate in the current Adopted Local Plan.
- Sutton's pupils achieving GCSE 'Attainment 8' scores is increasing (+4.7 since 2016-17).
- There are 15 Conservation Areas and 24 Areas of Special Local Character in Sutton. In addition, there are around 200 Listed Buildings and Structures and around 100 Locally Listed Buildings and Structures in Sutton.
- Sutton has over 600 hectares of Green Belt, over 500 hectares of Metropolitan Open Land and over 500 hectares of public open space. Sutton has Sites of Importance for Nature Conservation, of which 9 are of Metropolitan Importance (Grade I), 11 are of borough Importance (Grade I), 20 of borough Importance (Grade II) and 14 are of borough Importance (Grade III).

Sutton's Homes

- The Mayor's housing target for the borough is increasing (increase from 427 to 469 new homes per year), up from 363 when the current Adopted Local Plan was produced.
- Sutton has met its housing target every year over the last 10 years, with an average annual delivery of 485 new homes.

- Housing Need using the standard method is 886 homes per year (capped) or 1,942 homes (uncapped). This compares to a figure of 1,074 homes when the current Adopted Local Plan was prepared.
- The number of affordable homes built by developers is falling (average of 22% of overall supply in the last 5 years compared to 25% in the previous 5 years).
- In 2023, the average house price in Sutton was £440,572, the 6th lowest in London. However, house prices in Sutton have increased by +17.1% (+£64,376) since the adoption of the current Adopted Local Plan in 2018 (to 2023).

Sutton's Climate Emergency

- Sutton declared a climate emergency in 2019 with the aim of achieving net zero carbon emissions across the whole borough.
- Carbon emissions per person are falling (-34.9% decrease between 2009 and 2019).
- Sutton has the 11th lowest carbon emissions per person in London, the same position as when the current Local Plan was adopted in 2018. The primary source of borough carbon emissions are domestic - heating and powering homes.
- The frequency and severity of storm events, heatwaves, water shortages and drought conditions due to climate change are increasing.
- Around 1.2% of the borough's housing stock is located in high risk flood zones (around 1,000 homes).
- National air quality standards are not being met in some parts of the borough.

Sutton's High Streets and Centres

- The amount of retail floorspace is declining, in line with national trends. Town Centres have too much retail floorspace. This is in contrast to the situation in 2016, when significant amounts of new floorspace were required.
- Supermarket sales are likely to remain static for next 10 years (+0.1%).
- Retail sales likely to increase by +2.9% over the next 10 years. However, this growth is not from physical stores but online shopping.
- Internet retail shopping is increasing and will represent 40% of market share by 2040 (+11% increase from 2021), compared to an expected peak of 25% when the current Adopted Local Plan was prepared. Online food shopping will increase too.
- Large growth is recent leisure spend (+21% in 2021 and 24.1% in 2022) but average yearly growth to settle at around 1% long term.
- The demand for food outlets and restaurants is increasing, at a similar level to the last Adopted Local Plan.
- The amount of leisure floorspace needed is increasing.

Sutton's Economy and Employment

- The number of people in work has remained steady between 2011-12 to 2021-22 (+0.6% increase to 81.8% of the working age population), a slight increase since the Adopted Local Plan was prepared.

- The number of people unemployed has also remained steady in the 10 years to 2021-22 (-0.9% decrease to 5.2% of the working age population).
- Residents' weekly pay has increased between 2012 to 2022 (+17.2% increase to £696.80) but is lower than London and South London average and is increasing at a lower rate.
- The number of new businesses is increasing (+32.8% between 2011 and 2021 to 9,615).
- The number of new jobs for industry and offices is increasing significantly, with very low vacancy rates for both sectors.
- Impact of the pandemic on working patterns is still uncertain long term e.g. home working.
- Sutton's three largest sectors (at or over 10,000 jobs) are (1) 'administrative and support service activities', (2) 'healthcare' and (3) 'wholesale and retail trade'.

Sutton's Movement

- Car ownership is high, with 77.19% of households with at least one car or van in 2021 (+0.6% increase since 2011), well above the London average of 57.9%). This is the 5th highest in London.
- The private car remains the prominent mode of travel, accounting for 55% of daily trips by borough residents
- Sutton is now one of only three boroughs lacking a London Underground or London Overground station. In addition it has no Crossrail stations and a solitary Tramlink stop.
- Sutton has the lowest Transport for London capital investment per head in London.
- TfL have "paused" the Sutton Link tram project following the pandemic.
- In 2021, 25% of residents worked over 5km away and 36.5% of Sutton residents worked at home.
- The percentage of cycling trips by borough residents is low at 0.8% of all trips, down from 1.3% pre-pandemic.
- The percentage of walking trips by borough residents remains consistent at 24.2% of all trips.
- Over £14 million has been secured to improve the frequency of trains to Belmont to support the London Cancer Hub.

Key Challenges for Sutton

SIX KEY CHALLENGES

- 1. How can Sutton meet the need for more homes, particularly affordable homes, which are of the right quality and in the right place to support Sutton's increasing population.**
- 2. Delivering on the Council's commitment to achieve net zero carbon across the whole borough in support of Sutton's response to the climate emergency.**

3. How to promote the sustainable regeneration and economic vitality of Sutton Town Centre. How can Sutton Town Centre continue as an attractive and distinctive destination, with a focus for new homes and employment opportunities by transforming the attractiveness of the shopping environment, the quality of public realm, transport links and cultural offer.
4. How to plan for an increase in employment floorspace within Sutton which is needed to meet the expected growth in industrial activity over the plan period.
5. How to meet Sutton's sustainable transport needs and other infrastructure requirements of the borough.
6. How to accommodate the growth in housing, employment, transport and supporting community infrastructure while preserving and enhancing the much valued suburban character of the borough and the borough's architectural and historic heritage.

Local Plan Vision

B.2 The Local Plan Review sets out the strategic planning framework for the borough for a 15 year period. It contains a Vision and Objectives for Sutton, as well as the Strategic Policies, Development Management Policies and Site Allocations that will guide the future development in the borough.

B.3 The Local Plan Review takes account of the Council's other plans and strategies, and is an important delivery mechanism for the spatial elements of Sutton's Corporate Plan 'Ambitious for Sutton'. The six priorities of Ambitious for Sutton are:

- Action on climate change
- An inclusive place where everyone feels welcome and proud to be themselves
- Quality and affordable housing
- Strong and fair economic growth
- Campaigning for quality local services from the Mayor of London and Government
- An effective and well-run Council.

B.4 Further information can be found on the Council's Ambitious for Sutton website: <https://www.sutton.gov.uk/ambitiousforsutton>

The Vision

In 2041, Sutton will be a sustainable, net zero carbon borough, with well-designed, well-connected, attractive neighbourhoods where everyone feels welcome. Sutton will be known as a place with high-quality local services, sustainable travel, a place that is taking responsibility for tackling climate change, supports its most vulnerable residents and helps

its communities live in affordable, good quality homes. This will be supported by a strong, fair and resilient economy.

Sutton will have delivered new, well-designed homes across the borough, built to provide for Sutton's growing population. This new housing will address the differing needs of Sutton's communities, including new high quality affordable homes, homes to meet the needs of families and specialist homes to support Sutton's ageing population. The Council's strong track record of delivering its own affordable homes will continue, including the delivery of estate regeneration schemes where supported by its residents. This will have struck the right balance between the delivery of new homes for residents and the protection of the suburban character of the borough.

Sutton will have made significant progress in its response to the climate emergency through the delivery of net zero carbon developments, decarbonising existing Council buildings, an expanded decentralised energy network, promotion of the circular economy, improved energy efficiency of existing homes and businesses and improved air quality. Furthermore, Sutton will be fully adapted to the adverse impacts of climate change on human health, quality of life and the natural environment, including increased flood risk, summer heatwaves, drought and depletion of water resources.

Sutton Town Centre will be regenerated and revitalised, with ambitious proposals implemented for the St Nicholas Centre and Civic sites, providing much needed new homes, jobs, a retail offer that meets modern needs and increased leisure choices for residents. The Sutton Town Centre Conservation Area will have been enhanced through heritage-led design to create a high-quality built environment with excellent public realm. The gyratory will have been improved to enhance movement for pedestrians and cyclists in and around our High Street. Sutton Town Centre will be known as a vibrant destination that caters for all, with excellent connectivity, high quality services and a place supported by all the necessary social infrastructure.

Sutton's local economy will continue to thrive with an increased range of employment opportunities and premises to support existing local businesses and encourage new investment. Employment space will be diversified and supported by shared workspaces and hubs supported by excellent digital connectivity, helping to deliver inclusive opportunities and provide new and higher value jobs for local people. Sutton's industrial areas will be protected, enhanced and intensified to ensure sufficient strategic land for industry, warehousing, distribution and waste management facilities to support the varied needs of the borough.

Sutton's parks and open spaces, natural habitats and biodiversity will have been sustained and enhanced, so the borough is known as one of the greenest in London with excellent well connected and well used blue and green infrastructure. Beddington Farmlands will have been restored and recognised as a leading nature reserve in London. The River Wandle and other watercourses will be clean and have wider benefits in terms of managing flood risk, urban cooling, local amenity, enhanced biodiversity and general public enjoyment.

The Council will continue to lobby the Government, the Mayor of London and Transport for London for further public transport enhancements to make movement around Sutton easier, quicker and to support sustainable travel choices, particularly walking and cycling. Rail services to Belmont will have been significantly improved following investment, with additional direct services to London Victoria. This will have helped unlock the full potential of Sutton's London Cancer Hub, a world-leading life sciences campus located in the south of the borough. Electric vehicle charging points will be wide spread across Sutton, which will have encouraged the uptake of electric vehicles, along with changing the types of vehicles leased by the Council to electric variants and other zero emission fuels.

Collaboration with key infrastructure stakeholders will continue, such as education, health and utility providers, to continue the delivery of improvements to public services to enhance our social, health, education, digital and transportation infrastructure, which are critical to the ongoing needs of the borough.

Local Plan Objectives

Local Plan Objectives

Sutton's Communities and Homes

1. To meet Sutton's share of London's future housing requirement across a range of tenures and sizes to address the needs of the borough's communities.
2. To provide more affordable homes, including council housing and estate regeneration and affordable private rented homes, across the borough.
3. To meet the needs of Sutton's older people and other groups who need specialist housing.
4. To ensure growth is respectful of Sutton's suburban character and historic environment and protects and enhances the borough's local distinctiveness.
5. To use the Green Belt, Metropolitan Open Land, the parks and other open spaces to protect the open feel of the borough.
6. To provide the necessary education and health facilities and to ensure utilities and digital infrastructure can continue to support growth.

Sutton's Climate Emergency

7. To address the causes of climate change and deliver a 'net zero' carbon borough in line with the aims of Sutton's Environment Strategy and Climate Emergency Response Plan by avoiding or minimising both operational and whole-life carbon emissions from all new developments, promoting renewable energy generation and ensuring that any residual on-site emissions are offset through equivalent off-site measures.
8. To be fully adapted to the adverse impacts of climate change on human health, quality of life and the natural environment.

9. To support decentralised energy networks expansion across Sutton.
10. To develop and deliver flood alleviation schemes and enhance the quality of the River Wandle and its environs to increase the climate response benefits.
11. To protect and enhance the boroughs natural environment, wildlife and habitats, through the implementation of biodiversity net gain, protection of our open spaces and continued tree planting.
12. Reduce and mitigate environmental impacts including from pollution (such as air, noise, light, odour, fumes, water and soil) and secure improvements in air quality.

Sutton's Economy and Employment

13. To ensure strong and fair economic growth by safeguarding and intensifying appropriate land and buildings for business and employment use.
14. To promote the reconfiguration and intensification of industrial land and premises, promote the circular economy, create opportunities for new businesses to relocate within the borough and existing business to expand.
15. To support enhancements to the boroughs digital infrastructure and connectivity to support existing and new business and homes in Sutton.
16. To unlock growth in the life sciences sector and create high-value employment opportunities within the London Cancer Hub in partnership with local education providers, the health/life sciences sector and the Innovation Gateway.

Sutton's High Streets and Centres

17. Increase the viability and vitality of Sutton's network of town, district and local centres to create resilient destinations that successfully and demonstrably meet the community, retail, leisure and housing needs of the borough's residents.
18. To redevelop the St Nicholas Centre and Civic Centre sites as a catalyst for wider regeneration of Sutton Town Centre.
19. To deliver an improved layout for the town centre gyratory allowing for easier access into and around our High Street for walking, cycling and sustainable transport.
20. To enhance the quality of the public realm and the shopping environment across Sutton's town centre network, while providing for high quality retail and office floorspace, accommodating housing growth; providing excellent transport links; protecting and enhancing heritage assets and improving the town centre's cultural offer.

Sutton's Movement

21. To improve sustainable transport within the borough from all sources to encourage residents to make more sustainable travel choices.
22. To enhance footpaths and cycling routes to encourage walking and cycling.

23. To implement the Belmont Rail Frequency Improvement Scheme and continue to lobby the government, the Mayor and TfL for further transport infrastructure funding.
24. To support the move towards low carbon transport. This includes supporting electric vehicles by increasing charging infrastructure across the borough.

Section 19 of the Planning and Compulsory Purchase Act 2004 (as amended) requires that the Local Plan is integrated with the Corporate Plan. Sutton's 'Ambitious for Sutton' has six priorities and the objectives of the Local Plan have been matched to this priorities below:

Ambitious for Sutton Priority	Local Plan Objective
(i) Action on climate change	5, 7, 8, 9, 10, 11, 12 18, 19, 20, 21, 22, 23.
(ii) An inclusive place for everyone	1, 2, 3, 5, 6, 10, 11, 19, 21, 22, 24
(iii) quality and affordable housing	1, 2, 3, 4, 6, 14 16, 17.
(iv) Strong and fair economic growth	6, 8, 12, 13, 14, 15, 16, 17, 19, 20, 21, 24.
(v) Campaigning for quality local services	3, 5, 6, 7, 9, 11, 15, 18, 19, 20, 21, 22, 23.
(vi) An efficient and well-run Council	6, 7, 12, 13, 14, 15, 17.

Regulation 18 Consultation Questions



- A Do you agree with the draft vision and objectives?
- B If you do not support these, please give reasons and where possible suggest alternatives.

Chapter Three: Issues and Emerging Planning Policies

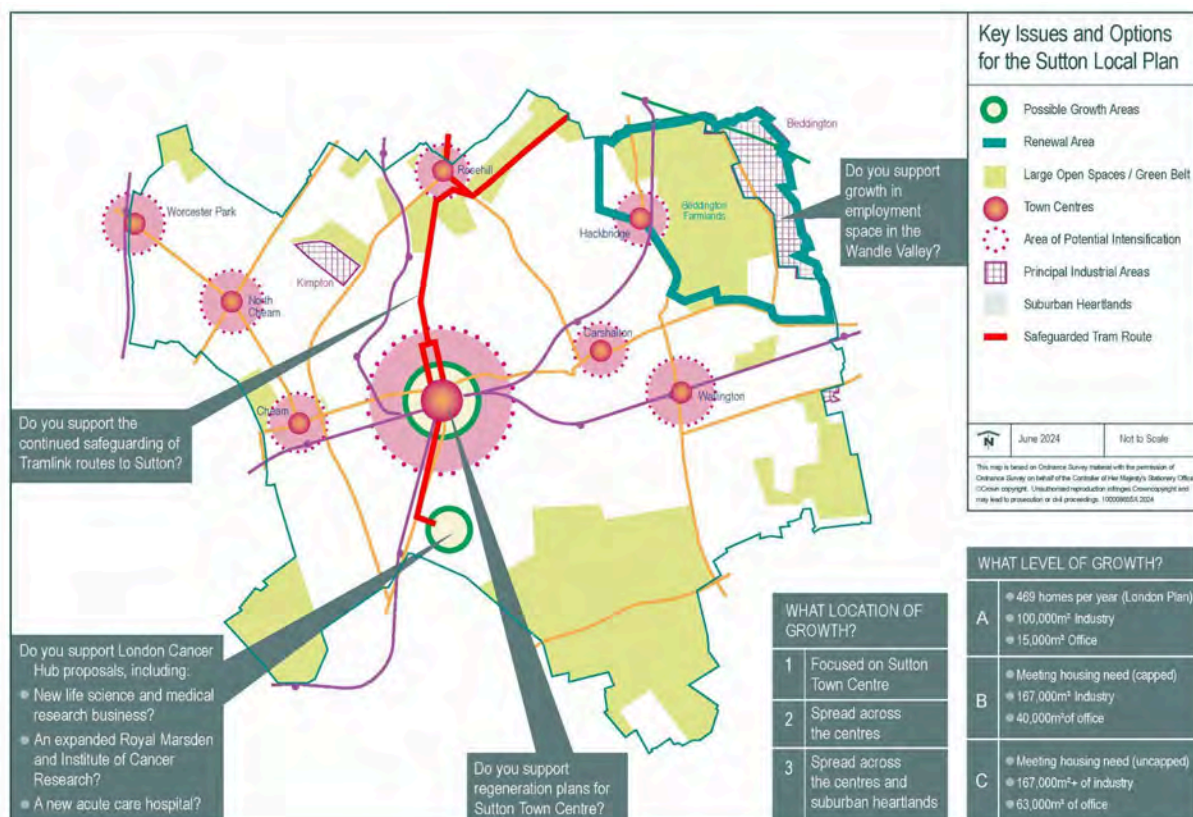
Introduction

- C.1** This chapter sets out the issues and options that the Council sees for development in the borough for the next 15 years. At the end of the chapter, there is also the option for raising issues that you consider the Council may have missed.
- C.2** With regard to some issues, the Council is so constrained by the factors set out in Figure 1 that to present an option would be a false choice. In these cases, a draft policy is produced for comment.
- C.3** In the next stage, when a draft plan will be prepared (Regulation 19 stage), the options will be worked up into policies and the current draft policies, included in this document, will be refined based on the responses received.

The Key Diagram

- C.4** Figure C1 below sets out the principal key strategic issues on which the Council is asking for views. More detail on these strategic issues is set out on the following pages.

Figure C1: Key Issues and Options Diagram



Issue 1 - Establishing Sutton's Growth Needs

1.A Introduction

- 1.1** Planning shapes the places where people live and work and plays a key role in creating sustainable communities. At the heart of national planning policy there is a presumption in favour of sustainable development. As such, the Local Plan Review should promote a sustainable pattern of development that seeks to meet the development needs of the borough, align growth and infrastructure, improve the environment, and respond to the climate emergency. Strategic policies should provide for objectively assessed needs for housing and other uses.
- 1.2** The London Plan, prepared by the Mayor of London, is the strategic plan for London, setting out an integrated economic, environmental, transport and social framework for the development of London over the next 20–25 years. Local plans in London are required to be in general conformity with the London Plan.
- 1.3** Underpinning the London Plan (2021) is the principle of 'good growth'. This is growth that is socially and economically inclusive and environmentally sustainable. The London Plan emphasises that good growth is the way in which sustainable development in London is to be achieved. To ensure that London's growth is Good Growth, each of the policy areas in this London Plan is informed by six Good Growth objectives: GG1 Building strong and inclusive communities; GG2 Making the best use of land; GG3 Creating a healthy city; GG4 Delivering the homes Londoners need; GG5 Growing a good economy; GG6 Increasing efficiency and resilience.
- 1.4** As such, it is important the Local Plan Review is aware of these fundamental principles. The Local Plan Review will ultimately set out a spatial strategy for Sutton for the next 15 years to identify the broad locations for meeting the strategic development needs of the borough.

1.B Context for Sutton

- 1.5** The Council has prepared a number of evidence based documents to establish the range of development needs for Sutton to 2041. This section will set out those needs and consider options for accommodating them.

Housing Need

- 1.6** Since 2018, the National Planning Policy Framework (NPPF) requires local authorities to inform the establishment of their housing requirement through a local housing need assessment which uses the nationally based standard method. This method is based on the 2014-based Household Projections plus an uplift for affordability, and can be subject to a 'cap'. The Standard Method also applies an uplift of 35% to major cities, such as London, reflecting the Government's objectives to drive housing into existing urban areas. In support of this, the Council commissioned a 'Strategic Housing Market and Local Housing Need Assessment'

(LHNA) which sets out these calculations and its forecasts. The housing need calculation is summarised in Table 1.1 below.

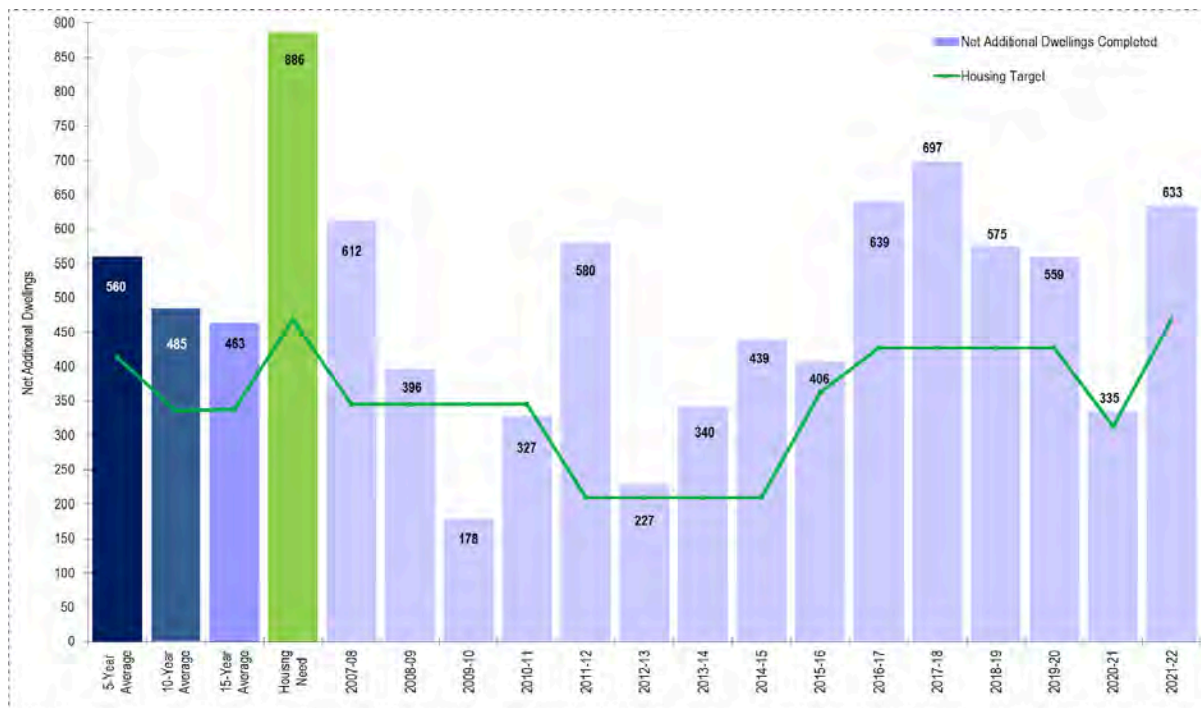
Table 1.1: LB Sutton Local Housing Need (2024)

National Standard Method Calculation Steps	Figure
A. Setting the Baseline	
Step 1: Household Growth (p.a.) over next 10 years, 2024-34	1,234
B. Affordability Adjustment:	
Median workplace-based affordability ratio, 2023	13.18
Adjustment Factor	157%
Step 2: Uncapped Housing Need Figure	1,942
C. Cap	
Date of London Plan adoption	March 2021
Plan more than 5 years old	No
Housing requirement in the London Plan	469
Higher Cap @ 40% above the housing requirement figure	657
Step 3: Capped Housing Need	657
D. Urban Uplift	
Top 20 Largest Area	Yes
35% Urban Uplift	229
Step 4: Minimum Local Housing Need (p.a.)	886
E. Conclusion	
Sutton Local Housing Need Figure	886

1.7 The initial calculation shows that Sutton’s housing need figure is 1,942, but as the London Plan was adopted less than 5 years ago the Council can apply a cap, which limits the need figure to 657 homes per year. However, as Sutton forms part of London, the Council has to apply the 35% ‘urban uplift’, which increases the final housing need figure of 886 homes per year.

1.8 Figure 1.1 below illustrates that, whilst Sutton has a strong track record of delivering against its housing target, a local housing need figure of 886 is higher than the average housing completions rate for Sutton over the last 15 years and higher than any single year of delivery.

Figure 1.1: LB Sutton Housing Completions



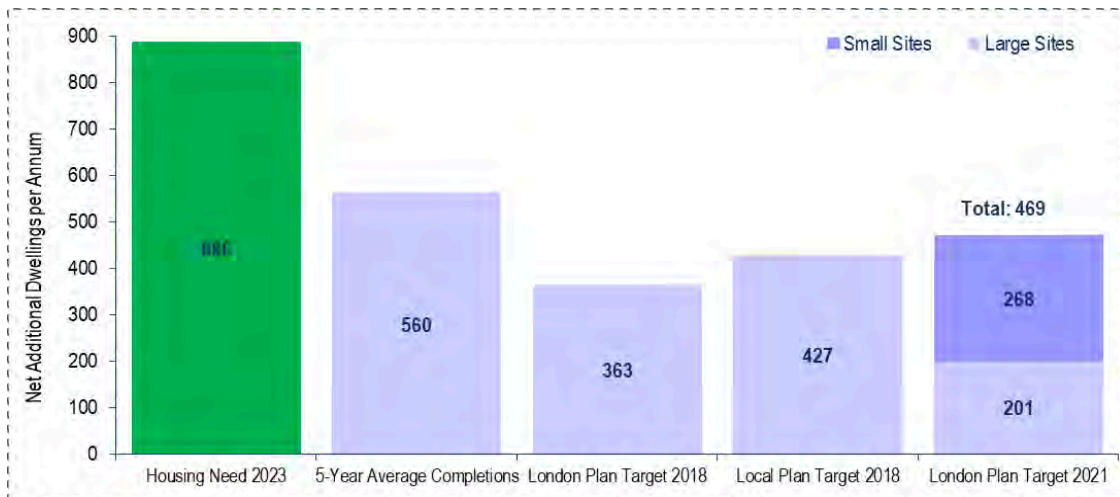
1.9 It is clear that if the Council tried to allocate sites to meet the forecasts in full, the character of the borough would experience significant change. Therefore, it is the Council’s view that, as the borough is so constrained by Green Belt, Metropolitan Open Land and established suburban housing; as well as the need to meet other development needs of the borough, particularly industry and employment, consideration needs to be given to the impact of meeting this figure in full. In addition, it is important to note that the London Plan considers that London forms one housing market area, a conclusion that is also reached in Sutton’s LHNA, and as such the Mayor allocates a minimum housing target to each London borough.

Housing Targets

1.10 The Adopted Local Plan (2018) set a housing target of 427 net additional dwellings per annum (ndpa) for the period 2016 to 2031. This represented an increase of 18% over the London Plan target of 363 ndpa at the time. However, in 2021 the Mayor of London adopted a new London Plan, which set a new housing target for Sutton for 469 ndpa for the period to 2029. Policy H1 of the London Plan states that boroughs must include these targets in their Development Plan Documents.

1.11 In addition to the overall borough housing target of 469 ndpa, the London Plan has introduced a greater emphasis on small sites (below 0.25 ha in size) to increase the overall housing delivery in London. As such, the London Plan now sets a small sites target for each borough, with Sutton’s set at 268 ndpa or 2,680 over a 10 year period. However, it is important to note that the small sites target is a component of, and not additional to, the overall housing target of 469 ndpa. The London Plan also makes clear that the relative contribution from large and small sites may fluctuate across the target period, providing the overall 10 year borough target is met.

Figure 1.2: LB Sutton Housing Targets



1.12 Beyond the current 10 year London Plan housing target period (2019/20 to 2028/29), the London Plan advises that if a target is needed, boroughs should draw on the London Plan Strategic Housing Land Availability Assessment (SHLAA) (2017) findings (which covers the period to 2041). This should also consider: any local evidence of identified housing capacity (sites that could support new homes); any additional housing capacity that could be delivered as a result of any committed transport infrastructure improvements; and roll forward the housing capacity assumptions applied in the London Plan for small sites.

1.13 Table 1.2 sets out the capacities identified in the London Plan SHLAA (2017), which was divided into 5 phases. However, it should be noted that the Phase 1 period occurred prior to the start of the London Plan, so does not count towards the capacities used to form the London Plan housing target.

Table 1.2: London Plan SHLAA Capacities 2017 to 2041

Capacity	Phase 1	Phase 2 to 3 (Current London Plan 10 Year Housing Target Period)	Phase 4 to 5 (12 Year Period)
Period	2017-18 to 2018-19	2019-20 to 2028-29	2029-30 to 2040-41
Large Sites Total	1,961	2,010	1,620
Small Sites Total	n/a	2,680	3,216
Total Capacity	1,961	4,690	4,836
Large Sites Annualised	n/a	201	135
Small Sites Annualised	n/a	268	268
Total Annual Target	n/a	469	403

1.14 Table 1.2 shows that the capacities identified in the SHLAA, beyond the London Plan housing target period of 2029, equates to an annual target of 403 net additional

dwelling (including the small sites figure of 268 net additional dwellings per year). However, the Council will need to consider whether there is any additional capacity beyond 2029 to supplement this figure of 403, including sites submitted through Sutton’s ‘Call for Sites’, Sutton’s Strategic Housing Land Availability Assessment, and any sites that have gained planning permission and are not accounted for already, as is required by the London Plan.

Industrial Land Need

- 1.15** The demand for industrial land in Sutton has been very high for a long time and the new evidence commissioned in support of the Local Plan Review shows that this remains to be the case. The Adopted Local Plan (2018) identified a need for around 40,000 sq.m. of new industrial space, which was met through intensification of existing sites and through the release of Metropolitan Open Land (MOL) adjacent to the Beddington Strategic Industrial Location (SIL).

- 1.16** The new Employment Land and Economic Needs Assessment (ELENA) 2023 identifies a high demand for new space, low levels of current supply and very low vacancy rates. This creates a need for 167,000 sq.m. (or 8,338 sq.m. per annum) of industrial floorspace (encompassing light and general industry and logistics and distribution) or 26 hectares (using the London Plan plot ratio of 65% i.e. the building(s) footprint covers 65% of the site). This is substantially higher than both the Adopted Local Plan (2018) need and historic delivery rates in Sutton, as outlined in Figure 1.3 below, and represents the equivalent of around a third of existing industrial floorspace in Sutton.

- 1.17** Meeting the industrial need will be a significant challenge as there is a finite amount of existing land that could be intensified and a lack of suitable options for new industrial space. The London Plan promotes multi-deck units as an efficient way of improving on-site intensification. However, the Council's evidence suggests that multi-deck use may not be a viable option in Sutton at present. This is discussed further in this document under Issue 24 and 25.

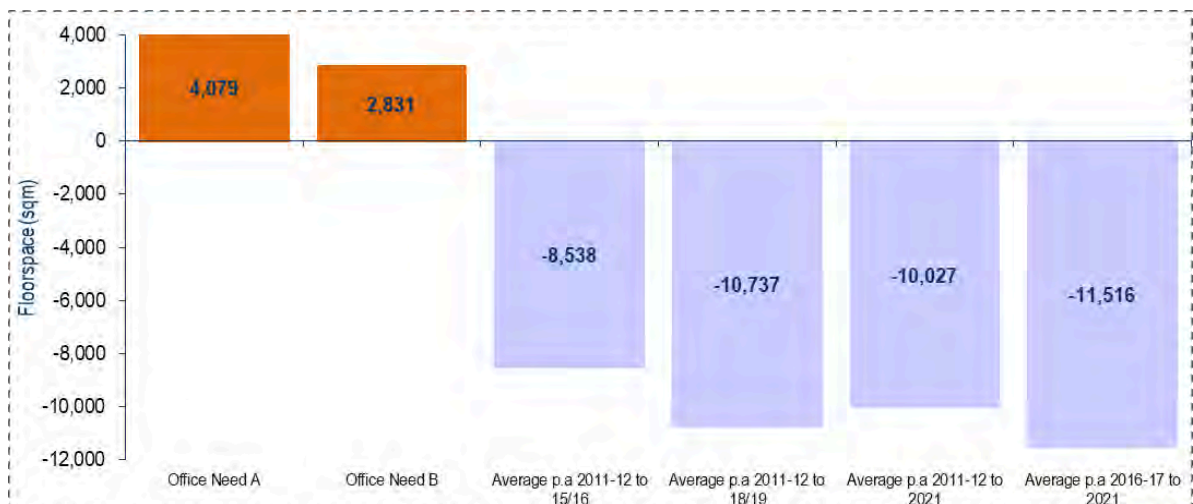
Figure 1.3: Industrial Need and Past Delivery



Office Need

- 1.18** Over the last decade, the office market has weakened substantially in response to a range of factors, including a significant reduction in stock following conversion to residential uses through increased use of permitted development rights. Technological advances also mean it is now straightforward to work from home. The decline in the office market accelerated in the pandemic, with occupiers now focused on smaller, but better quality units.
- 1.19** Reflecting current circumstances, the ELENA concluded that the demand for office space in Sutton is weak and, even prior to the pandemic, the growth in office jobs was not resulting in an increase in demand for additional floorspace.
- 1.20** Despite a weak office market, with low demand, the ELENA shows strong jobs growth over the plan period, which translates into a high office floorspace figure. Based on a floorspace to job ratio of 12 sq.m. the office need is 81,583 sq.m. (or 4,079 sq.m. per annum). Based on a ratio of 7.4 sq.m. the office need is 56,620 sq.m. (or 2,831 sq.m. per annum). The ELENA suggests that one option is to focus on meeting the requirement for the first 5 to 10 years giving a minimum requirement of 15,000 sq.m. This is in stark contrast to the trends over the last 10 years that show significant losses (Figure 1.4).
- 1.21** The Local Plan Review considers (see Issue 26 on Office Development) how it can address the conflict between the weak office market and low market demand for office space versus the employment study identifying significant jobs growth that would ordinarily drive demand for new office floorspace. This could involve delivering office “floorspace” in new ways, so that job growth is still supported. For example, some job growth will occur organically without necessarily triggering the need for additional floorspace. This is either because existing space is used more optimally, and/or hybrid working means existing floorspace can be used alongside home-working to support a greater number of workers/jobs. This approach will be taken by the Council with the relocated Civic Centre site, which will require significantly less floorspace than the current building as working arrangements will continue to be hybrid.

Figure 1.4: Annual Office Need and Past Delivery



Retail and Town Centre Need

1.22 Town centres and retail outlets have been operating in a challenging environment now for many years, made worse by the impacts of the pandemic in 2020 and the continued growth of online retail sales (for both convenience and comparison shopping). In support of Sutton's town centres the Council commissioned a Town Centres and Retail Needs Assessment (TCRNA) to consider the development needs for town centre uses over the plan period.

1.23 This report concludes that for comparison shopping, Sutton has a surplus of floorspace (-2,911 sq.m.) and, for convenience retail, there is a small need (1,340 sq.m.) over the plan period. For food and beverage there is an identified need of 12,472 sq.m. by 2041.

Figure 1.5: Town Centre Need to 2041



1.24 Whilst the evidence suggests that more comparison floorspace is not required this doesn't rule out providing retail space that can meet modern requirements that is higher quality and more efficient than older, existing stock. This is discussed further under Issue 9 on Sutton Town Centre and Issue 27 on Town Centres and Retail.

Infrastructure Need

1.25 With increased development, it is necessary to assess the infrastructure needs of the borough, including health, education, transport, green and blue infrastructure and utilities. Specifically:

- The Council considers there are sufficient existing, planned or safeguarded sites for education to support the lower to medium housing growth scenarios. Additional provision would be required to meet uncapped housing need figures.
- Under all scenarios, additional health care facilities will need to be provided, and is discussed in Issue 29 on Health and Well-being.
- The Council will continue to work with transport providers to improve movement in Sutton, including the delivering of the Belmont Rail Improvement scheme, lobbying for improved rail and bus services, and an improved walking and cycling environment to encourage more sustainable choices.

1.26 The needs of each of these infrastructure themes are considered and set out in detail in the relevant sections of this document.

Towards a Policy Approach

1.27 Based upon the evidence and analysis, the Council has established a series of policy options for consideration as part of this Regulation 18 consultation. These are:

1.C Initial Growth Issues and Options

The Local Plan needs to set out various options for growth, based upon the needs identified above. Subject to the responses to this consultation, it may be that the solution to the problem of meeting the borough's need lies in a combination of these options, rather than one option in particular. Through this consultation the Council is trying to establish what local residents, businesses and developers think the opportunities and challenges are for each option.

Development Need	Growth Options		
	Option A	Option B	Option C
Housing (net homes per year)	<p>Minimum of 469 units to 2029</p> <p>Minimum of 403 units from 2029 to 2041</p> <p>(This represents the current London Plan housing target for Sutton)</p>	<p>Minimum of 657 units</p> <p>(This represents an uplift on the current London Plan housing target and is equivalent to Sutton's housing need figure before the national urban uplift is applied, as set out in Table 1.1 above)</p>	<p>Minimum of 886 units</p> <p>(This represents Sutton's capped housing need figure, as set out in Table 1.1 above)</p>
Industry Floorspace* (Delivered with a building footprint to plot ratio of 65%)	100,000 sq.m. (based on past trends projection)	166,760 sq.m. (based on meeting need in full)	166,760 sq.m. + (based on exceeding need)
Office Floorspace**	Minimum 15,000 sq.m. (At least the first 5 years)	56,620 sq.m. (floorspace to job ratio of 7.4 sq.m.)	81,583 sq.m. (floorspace to job ratio of 12 sq.m.)
Retail Floorspace***	1,340 sq.m. (Convenience Retail)	1,340 sq.m. (Convenience Retail)	1,340 sq.m. + (Convenience Retail)
Food and Beverage****	12,472 sq.m. (based on meeting need in full)	12,472 sq.m. + (based on exceeding need)	12,472 sq.m. + (based on exceeding need)
Infrastructure	Metroisation and improved bus services. New Healthcare facilities. Retain safeguarded primary school in Sutton TC.	Metroisation and improved bus services. New Healthcare facilities. Retain safeguarded primary school in Sutton TC.	Significant public transport improvements. New healthcare facilities. New primary and secondary schools.

Examples of existing businesses in Sutton and their sizes:

*Prologis Industrial Units, Beddington Lane = 20,522 sq.m.

**Subsea7 Office, Brighton Road, Sutton = 14,000 sq.m.

***Aldi Supermarket, North Cheam = 1,500 sq.m.

****Pizza Express, Sutton = 150 sq.m.

For each growth option there are advantages and disadvantages. For example, high housing targets will mean more people in the borough can be housed, and more industrial floorspace provided could mean more local jobs. However, higher growth may put more pressure on infrastructure requirements, such as transport improvements, or could lead to the loss of open space in order to accommodate development.

1.D Regulation 18 Consultation Questions



- A. How much housing should Sutton plan for?
- B. How much industry should Sutton plan for?
- C. How much office space should Sutton plan for?
- D. How much retail and food and beverage should Sutton plan for?
- E. How much infrastructure does Sutton need?
- F. For any of the above, is there any other scenario that could be planned for or proposed?

Where possible, please give your reasons for each answer (optional).

Issue 2 - Sutton's Spatial Strategy

2.A Introduction

- 2.1** The Council is required by national policy to produce strategic policies that set out an overall strategy for the pattern, scale and quality of development for the area. These policies must make sufficient provision for a range of specified types of development and the conservation and enhancement of the natural, built and historic environment. This means that any strategy for meeting Sutton's overall growth needs are linked to the potential locations where that growth will take place.
- 2.2** The previous section of this document set out what those needs are likely to be for Sutton over the period to 2041. In accordance with the NPPF, the Local Plan Review must also set out options for where this can be delivered, which collectively will form Sutton's spatial strategy.

2.B Context for Sutton

Current Spatial Distribution of Growth

- 2.3** The spatial strategy in Sutton's currently Adopted Local Plan (2018) focuses housing growth on the borough's town and district centre network and their Areas of Potential Intensification (APIs). These APIs are identified areas where higher housing density is potentially appropriate. They are located around Sutton Town Centre and the seven District Centres and are based on a walking distance of 400m or 800m from that centre (the equivalent of 5 minutes' and 10 minutes' walking distance from that centre).
- 2.4** The housing areas outside the APIs are referred to as "Suburban Heartlands". The Adopted Local Plan (2018) directs 55% of new housing growth to Sutton Town Centre and its API, 15% of the new housing growth to Hackbridge and its API, and 20% to the remaining Districts Centres and their APIs . A summary of the current spatial distribution of housing growth can be seen in Table 2.1 below compared to the delivery to date.

Table 2.1: Adopted Local Plan (2018) Spatial Distribution of Housing and Actual Delivery

Location	Local Plan (2018) Spatial Strategy	Actual Delivery 2016 to 2022	Difference
Sutton Town Centre & API	55%	40%	-15%
Hackbridge District Centre and API	15%	15%	0%
Wallington District Centre and API	10%	9%	-1%
Other District centres and APIs	10%	5%	-5%
Suburban Heartlands	10%	30%	+20%

- 2.5** The biggest deviation from the spatial strategy has occurred in Sutton Town Centre and the suburban heartlands. However, there were several schemes in Sutton Town Centre that were delivered quicker than anticipated, so were delivered outside the plan period, and a number of office blocks in the suburban heartlands that came forward as windfall conversions to residential following the introduction of the relevant permitted development rights. The spatial strategy distribution percentage figures reflect the plan period as a whole, are not yearly targets, and there still remains significant capacity in Sutton Town Centre for housing development.

Sutton Town Centre Opportunity Area

- 2.6** The London Plan (2021) identifies Sutton Town Centre (linked with the London Cancer Hub) as an Opportunity Area, under the category of the “Trams Triangle”. The London Plan highlights the proposal to extend the Tram to Sutton Town Centre, and potentially beyond to the London Cancer Hub, which would improve public transport accessibility to the town centre and St. Helier Hospital, and support the delivery of new homes and new jobs. Figure 2.12 of the London Plan (2021) suggests this could unlock the delivery of 5,000 homes and 3,500 jobs in Sutton Town Centre.
- 2.7** However, despite extensive work by the Council over many years, in 2020 the tramlink extension to Sutton was officially “paused” by TfL and there is not currently a funding commitment to the project from them. Given that the Sutton Opportunity Area was predicated on the delivery of tramlink, the status of this designation is now unachievable if the Tramlink extension or alternative major transport inventions are not delivered to Sutton Town Centre and beyond.
- 2.8** Notwithstanding this, Sutton Town Centre still has the best public transport accessibility in the borough, has capacity to deliver significant levels of growth and will continue to be an important place for Sutton’s development needs.

Character Study

- 2.9** In support of the Local Plan Review, the Council has prepared a draft borough-wide ‘Character Study’ to define the characteristics, qualities and value of different places in Sutton. The Council’s approach to develop a Character Study has been implemented following central government guidance as detailed in the London Plan Characterisation and Growth guidance document. This outlines the definitions for areas of growth and change as well as methodologies for carrying out these studies. The study recommends which parts of the borough should be categorised as (a) conserve; (b) enhance; and (c) transform. This study is in accordance with the London Plan and the London Plan Guidance (LPG), this draft Character Study has helped inform the Issues and Preferred Options document in understanding what the capacity for growth is in different neighbourhoods within the borough, which has helped inform the spatial strategy options.

Towards a Policy Approach

- 2.10** The potential spatial strategies to accommodate growth are set out below in Table 2.2. To some extent the availability of site allocations will have a degree of influence on the final strategy but there is still scope to consider what the most appropriate spatial strategy is.

2.11 Based on the emerging vision and objectives, and the identified development needs, the Council has identified three broad spatial options for the future development of the borough up to 2041. These options represent alternative strategies for achieving the borough’s ambitions and needs. The strategies identified may be characterised as:

1. Sutton Town Centre first
2. Sutton’s Town and District Centre Network
3. Dispersed Development.

2.12 It is possible that the final preferred option presented in the draft Local Plan could include a combination of the below approaches

2.C Initial Spatial Strategy Issues and Options		
Table 2.2: Options for Sutton’s Spatial Strategy		
Spatial Strategy Option 1	Spatial Strategy Option 2	Spatial Strategy Option 3
Sutton Town Centre first	Sutton Town and District Centre Network	Dispersed Development
<p><i>Approach:</i></p> <ul style="list-style-type: none"> ● Sutton Town Centre accommodates the vast majority of the borough’s growth including, housing, retail, offices, other town centres uses and associated infrastructure. ● The seven District Centres accommodate smaller levels of development. ● Limited development in suburban heartlands ● Industrial development is accommodated in Strategic Industrial Areas. ● The London Cancer Hub delivers significant medical research floorspace and potentially a new hospital. 	<p><i>Approach:</i></p> <ul style="list-style-type: none"> ● Sutton Town Centre still accommodates high levels of growth but significant amounts are also accommodated across Sutton’s District Centre network. ● Appropriate levels of development within suburban areas, predominantly for residential uses. ● Release of some Green Belt and/or Metropolitan Open Land to meet housing and economic development need. ● Industrial development is largely accommodated in Strategic Industrial Areas but with some new areas designated. ● The London Cancer Hub delivers significant medical research floorspace and potentially a new hospital. 	<p><i>Approach:</i></p> <ul style="list-style-type: none"> ● Sutton Town Centre accommodates most of the borough’s development needs but the District Centres and the suburban heartlands also accommodate significant levels of development. ● Strategic release of some Green Belt and/or Metropolitan Open Land to meet development housing and economic need. ● Industrial development is largely accommodated in Strategic Industrial Areas but with some new areas designated. ● The London Cancer Hub delivers significant medical research floorspace and potentially a new hospital.

<p><i>Impacts:</i></p> <ul style="list-style-type: none"> • The vast majority of development is accommodated in the most sustainable area with the best public transport accessibility and access to services. • Significant development delivered in a metropolitan centre. • Further taller buildings required to accommodate need in a smaller area. • Harder to deliver family homes. • Limited access to open space and challenging to provide more in a town centre location. • Suburban areas in Sutton are protected. • Infrastructure requirements concentrated in Sutton Town Centre are more challenging. 	<p><i>Impacts:</i></p> <ul style="list-style-type: none"> • Development is still delivered in sustainable locations but access to public transport and services is lower in District Centres than the town centre. • Infrastructure requirements are spread across Sutton Town Centre and District Centres so less pressure on Sutton Town Centre and its infrastructure. • May require taller buildings in appropriate locations within District Centres. • Could achieve higher levels of family homes. • Some small site development within suburban areas, which could impact on existing character. • Loss of some Green Belt and Metropolitan Open Land. 	<p><i>Impacts:</i></p> <ul style="list-style-type: none"> • The least sustainable as more development is dispersed across the borough in locations with poorer public transport accessibility. More reliance on private car use. • Reliance on taller buildings is reduced. • Most likely to deliver family homes. • Could require the use of greenfield sites to accommodate housing and industry. • Likely to result in larger development in suburban areas. • Likely to change the character of the borough through small site development. • Greater loss of some Green Belt and Metropolitan Open Land. • Infrastructure requirements are likely to be more dispersed, subject to availability of sites.
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2.D Regulation 18 Consultation Questions



- A. Which spatial strategy do you support?
- B. Can you think of any other strategy that should be considered?

Please give your reasons for each answer (optional).

Issue 3 - Net Zero Carbon

3.A Introduction

- 3.1** The world is facing a climate emergency. According to the Sixth Assessment Report (AR6) of the Intergovernmental Panel on Climate Change (IPCC, 2023), human activities, principally through emissions of carbon dioxide (CO₂) and other greenhouse gases, have unequivocally caused global warming, with surface temperatures reaching 1.1°C above the 1850-1900 average from 2011-2020. Global greenhouse emissions have continued to increase. In 2023, atmospheric CO₂ concentrations (419 parts per million) were higher than at any time in at least 2 million years. The Sixth Assessment Report concludes that:
- the current decade represents the last chance to implement effective climate policies that are sufficient to meet the global challenges of climate change;
 - limiting the rise in average global temperatures to 1.5°C in line with the most ambitious goal of the 2015 Paris Agreement will still lead to serious and irreversible consequences for centuries;
 - on current trends, 1.5°C of warming could be exceeded by 2030, 10 years earlier than anticipated by the IPCC's 5th Assessment Report; and
 - limiting warming to 1.5 °C is possible, but would require global emissions to be cut 50% by the year 2030 and 100% by 2050.
- 3.2** Climate change is driving an increase in the frequency and severity of extreme weather events across the globe, such as heatwaves, heavy rainfall, storms and droughts. It is also affecting food and water security for millions of people and causing widespread irreversible damage to ecosystems, habitats and species.
- 3.3** The UK's climate continues to change. Recent decades have been significantly warmer and wetter than in the 20th century with each of the 10 warmest years since 1884 occurring since the year 2000. 2022 was the warmest year since records began with temperatures 0.9°C above the 1991-2020 average. In July 2022, 40°C was recorded in the UK for the first time causing the Government to declare the first ever red 'extreme heat' warning. Five of the 10 wettest years since records began in 1836 have occurred since 2000. Over the most recent decade (2013-2022), UK winters have been 25% wetter than 1961-1990.
- 3.4** The latest UK Climate Projections 2018 (UKCP18) indicate that: by 2070 in the high emission scenario, average warming across the UK will range from 0.9 °C to 5.4 °C in summer and from 0.7 °C to 4.2 °C in winter, and that average changes in rainfall patterns will range from -47% to +2% in summer, and between -1% to +35% in winter.
- 3.5** The Paris Agreement, negotiated between world leaders at the UN Climate Change Conference (COP21) in Paris in December 2015, sets the goal of substantially reducing global greenhouse gas emissions to limit the global temperature increase in this century to +2° Celsius while pursuing efforts to limit the increase even further to +1.5°. Every five years, each country is required to submit an updated national

climate action plan. Operational details for the practical implementation of the Paris Agreement were agreed subsequently at COP24 in Katowice, Poland, in December 2018 (the 'Paris Rulebook'), and finalised at COP26 in Glasgow, in November 2021.

3.6 The UK 'Net Zero Strategy - Build Back Greener' published by the former Department for Business, Energy and Industrial Strategy (BEIS) and the Department for Energy Security and Net Zero (DESNZ) in 2021 sets out the Government's long-term plan for implementing the Paris Agreement and delivering a zero carbon economy by 2050. A delivery pathway is set out showing indicative emissions reductions across each sector of the economy to meet national targets up to and including the sixth carbon budget (2033-2037). Key goals include:

- by 2035 the UK will be powered entirely by clean electricity, subject to security of supply;
- an ambition that by 2035, no new gas boilers will be sold;
- a new £60 million Heat Pump Ready programme;
- ending the sale of new petrol and diesel cars by 2030 (now put back to 2035);
- £620 million funding for zero emission vehicle grants and EV Infrastructure; and
- additional funding to support net zero innovation projects.

3.7 The Government's overarching goal of moving towards a zero carbon economy forms part of the 'environmental objective' underlying the NPPF (2023) which seeks to "*protect and enhance our natural, built and historic environment; including [by] mitigating and adapting to climate change, including moving to a low carbon economy*".

3.8 The Mayor's Environment Strategy (GLA, 2018) sets out a key aim for "*London to be a zero carbon city by 2050, with energy efficient buildings, clean transport and clean energy*" and for London to transition to a low carbon circular economy. As part of this aim, a key goal is set to "*clean up London's air, water and energy in a way that is fair, protects the health of Londoners, and contributes to the fight against climate change*". The Mayor's aim of creating a low carbon circular economy and a zero carbon city by 2050 is carried forward in Policy GG6 of the London Plan 2021.

3.9 However, since the publication of the Mayor's Environment Strategy, the need for even more urgent action has become clearer. In response, the Mayor declared a climate emergency for London and has brought forward by 20 years the target for London to be net zero, by 2030. Based on an analysis of four possible pathways to net zero, the Mayor has selected a preferred pathway to net zero – known as the 'accelerated green pathway'. Achieving this by 2030 requires:

- a 40% reduction in the total heat demand of London's buildings, requiring over 2 million homes and 250,000 non-domestic buildings to be properly insulated;
- 2.2 million heat pumps in operation in London by 2030;
- 460,000 buildings connected to district heating networks by 2030;
- a 27% reduction in car vehicle kilometres travelled by 2030; and
- fossil fuel car and van sales ended by 2030.

3.B Context for Sutton

- 3.10** Sutton’s refreshed Environment Strategy and Climate Emergency Response Plan 2019-25 adopted in October 2020 sets a vision for Sutton to be London’s most sustainable borough. The long-term goal of delivering borough-wide zero carbon emissions by ensuring that all of the borough’s energy needs are met from renewable, community and local sources of energy is central to this vision. Sutton’s Climate Emergency Response Plan is updated on an annual basis.
- 3.11** The Council recognises that, as well as helping to avoid catastrophic climate change, the transition to a zero carbon borough will deliver many other benefits for quality of life and the local economy including improving health through better air quality and more active lifestyles; reducing inequalities and creating green jobs. A just transition to net zero will ensure that everyone, including those most vulnerable, will benefit from warm, energy efficient homes which cost less to heat.
- 3.12** Sutton’s current CO₂ emissions are dominated by buildings and transport. Government data indicates that in 2022, the borough as a whole emitted 619 kt CO₂e per annum across all sectors, including 40% from homes and 36% from transport.

Towards a Policy Approach for Sutton

- 3.13** In light of all these considerations, the Council considers that it can move directly towards a draft policy approach for the borough. The draft policy is as follows:

3.C Draft Policy 3 on Net Zero Carbon

In seeking to tackle the causes of climate change, the Council will promote the delivery of a Net Zero Carbon borough over the Local Plan period in line with the aims of the UK Net Zero Strategy; the Mayor’s Vision of a Zero Carbon City by 2030; and Sutton’s Environment Strategy and Climate Emergency Response Plan 2019-25, by:

- (a) Achieving net zero carbon standards in all new residential and commercial developments, including major refurbishments and changes of use, by:
 - (i) minimising energy demand through fabric energy efficiency measures; promoting the efficient supply of energy from locally-generated low or zero carbon sources and maximising on-site renewable energy generation;
 - (ii) offsetting remaining on site carbon emissions by securing developer contributions to fund equivalent carbon reduction measures off-site; and
 - (iii) reducing whole life-cycle emissions arising from unregulated emissions, embodied carbon and eventual demolition.
- (b) Working with heat network operators, developers and local communities to promote the development and/or expansion of low or zero carbon district heat networks served by local secondary heat sources, particularly within the Hackbridge area, Sutton Town Centre and other ‘Heat Network Priority Areas’ identified by the Mayor.
- (c) Ensuring that all new Council housing, estate regeneration schemes and new or

refurbished Council buildings, schools and other public buildings, achieve net zero carbon standards on-site, incorporate Passivhaus principles and demonstrate exemplary standards of sustainable design and construction in line with nationally recognised certification schemes.

- (d) Implementing energy retrofit measures to zero carbon for existing Council housing, other social housing managed by the Sutton Housing Partnership and other Council-owned buildings in line with the Council's net zero pathway with funding from the Government's public sector decarbonisation scheme, the Council's carbon offset fund and other sources of available funding.
- (e) Promoting a low carbon circular economy in accordance with the aims of the Mayor's Environment Strategy; the Mayor's Circular Economy Statement Guidance 2021 and Policy WP7 of the South London Waste Plan Development Plan Document (DPD) by treating construction materials as resources rather than waste and by prioritising the retention of existing built structures above demolition wherever possible; and
- (f) Reducing carbon emissions and air pollution from transport in line with the Mayor's Zero Carbon Pathway 2030, Sutton's Sustainable Transport Strategy 2020-25 and 'healthy streets' principles by promoting walking, cycling and public transport use; reducing car dependence; and through the provision of on and off-street charging facilities for ultra-low emission vehicles (ULEVs).

3.D Regulation 18 Consultation Questions



- A. Do you agree with the draft policy on Net Zero?
- B. If you do not support the provisions of the draft policy, please give reasons and where possible suggest alternatives.

Issue 4 - Flood Risk Management and Making Space for Water

4.A Introduction

- 4.1** The National Flood and Coastal Erosion Risk Management (FCERM) Strategy (DEFRA, 2022) sets a core ambition to create climate resilient places by taking the correct planning decisions and investment to ensure resilient infrastructure, environmental improvements and sustainable growth.
- 4.2** The NPPF (2023) requires that planning policies are informed by a strategic flood risk assessment (SFRA) and should manage flood risk from all sources, including fluvial (river), surface water, groundwater and sewer flooding, taking account of advice from the Environment Agency (EA) and other relevant bodies, such as lead local flood authorities (LLFAs). Inappropriate development in flood risk areas must be avoided by directing development away from areas at highest risk and, where development is necessary in such areas, it should be made safe for its lifetime without increasing flood risk elsewhere.
- 4.3** Local Plans are therefore required to apply a sequential, risk-based approach to the location of development - taking into account all sources of flood risk and future climate impacts - so as to avoid, where possible, flood risk to people and property by applying the 'sequential test' and then, if necessary, the 'exception test', and by using opportunities provided by new development to reduce flood risk through the use of nature-based solutions.
- 4.4** London Plan Policy SI 12 on 'Flood risk management' requires that flood risk from all sources is managed in a sustainable and cost-effective manner in collaboration with developers, the EA and infrastructure providers. Local Plans should use the SFRA as the basis for identifying flood risk areas and policies for reducing these risks. As a lead local flood authority (LLFA), the Council is required under the Flood and Water Management Act 2010 to implement a Local Flood Risk Management Strategy (LFRMS). Sutton's LFRMS and Action Plan (2023) forms the basis for identifying flood alleviation schemes in priority areas and sets an objective to use planning powers to mitigate flood risk to or caused by developments across Sutton.
- 4.5** The River Wandle Catchment Plan (2014) sets out a joint strategy for the restoration of the Wandle aligned with the EA's national 'catchment-based' approach for river management planning. It was originally intended to help the Wandle reach 'Good Ecological Potential' status under the EU Water Framework Directive (which applied to the UK prior to Brexit) through partnership working between the Council, the EA, the South East Rivers Trust (formerly the Wandle Trust), local business and residents.

4.B Context for Sutton

Strategic Flood Risk Assessment (SFRA)

- 4.6** Sutton's SFRA Level Report 1 (Metis Ltd, 2023) provides a strategic overview for all sources of flood risk within the borough and has been used as the basis for identifying the Local Plan issues and preferred options set out below and for

undertaking the sequential test on potential site allocations as part of the accompanying Sustainability Appraisal (SA) report. It also provides guidance on the content of site specific Flood Risk Assessments, including details of sequential test and exception test requirements. Following consultation on this Issues and Preferred Options document, the Council will prepare a SFRA Level 2, which will look at draft Site Allocations in more detail.

Fluvial Flooding

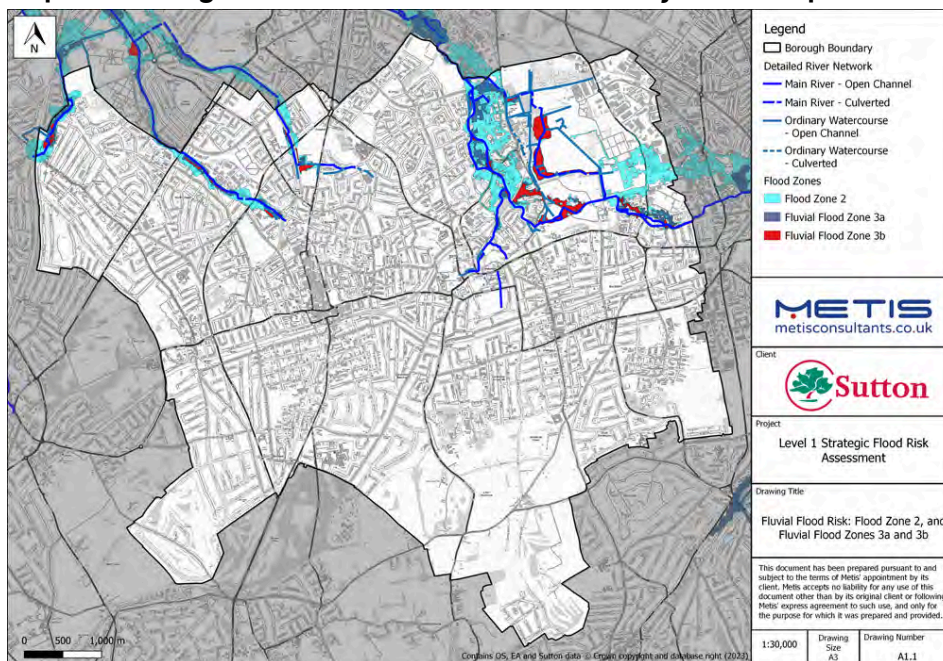
4.7 Fluvial flooding occurs when a main river exceeds its capacity following prolonged or heavy rainfall. Map 4.1 shows the risk of fluvial flooding across the borough in terms of the following EA Flood Zones:

- Flood Zone 1 (low risk): Annual probability below 1 in 1,000 yrs (<0.1% Annual Exceedance Probability or AEP);
- Flood Zone 2 (medium risk): Annual probability between 1 in 100 and 1 in 1,000 yrs (0.1-1.0% AEP);
- Flood Zone 3a (high risk): Annual probability of 1 in 100 yrs or more ($\geq 1\%$ AEP);
- Flood Zone 3b (Functional Floodplain): Land at the greatest risk of flooding and where water must flow or be stored during times of flood. Typically, this includes land with an annual probability of flooding of 1 in 30 years or greater ($\geq 3.3\%$ AEP), and land that is designed to flood (e.g. flood attenuation scheme).

4.8 While local planning authorities are expected to identify the extent of Flood Zone 3b, the necessary EA modelling is not currently available for the 1 in 30 yr event. The 1 in 20 yr extents have therefore been used to represent Flood Zone 3b in the SFRA.

4.9 Map 4.1 shows that areas at risk of fluvial flooding lie mostly within the Wandle catchment towards the north-east of the borough and adjacent to the Beverley and Pyl Brooks towards the north-west.

Map 4.1: Borough fluvial flood extents for 1 in 100 year event plus climate change



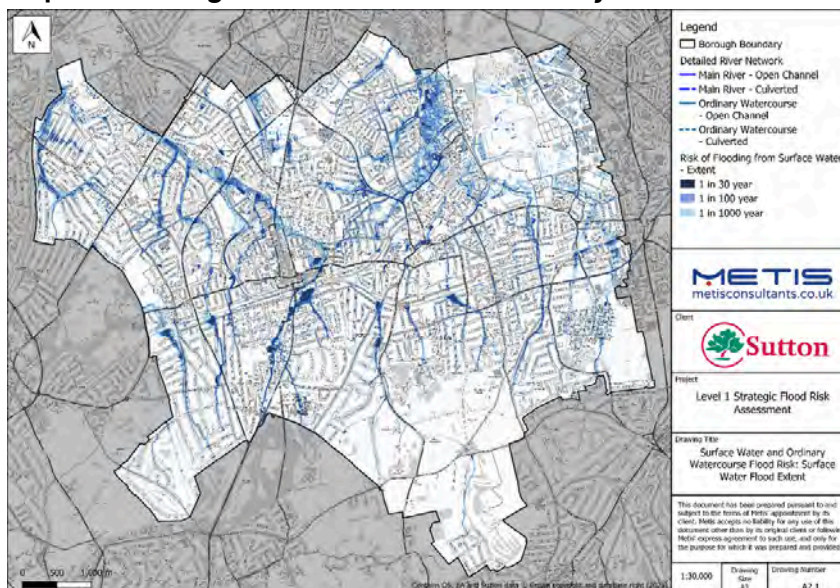
Surface Water Flooding

4.10 Surface water flooding occurs following heavy rainfall as a result of overland flow or ponding before the runoff enters the surface water drainage network or nearby watercourse. Surface water flooding is exacerbated where the capacity of drainage channels, storage systems and the surface water drainage network become overwhelmed and cannot drain water at a sufficient rate. Wetter winters and more intense storms resulting from climate change will lead to more runoff and more people, properties, and infrastructure at risk of flooding.

4.11 The SFRA Level 1 Report notes that the majority of the borough is heavily urbanised and densely populated, with impermeable surfaces and poor infiltration rates in many areas. Areas at a higher risk of surface water flooding include parts of Sutton Town Centre, Hackbridge and Worcester Park. Map 4.2 shows the extent of surface water flood risk across the borough based on the EA's Risk of Flooding from Surface Water (RoFSW) map for the 1 in 30 yr (3.3% AEP); 1 in 100 yr (1% AEP) and 1 in 1,000 yr (0.1% AEP) events. In parallel with the EA's fluvial Flood Zones (see above), the SFRA Level 1 Report defines equivalent flood risk zones for surface water as follows:

- Flood Zone 3a (surface water): EA-modelled surface water flood extents for events with a return period of greater than 1 in 100 years (>1% AEP); and
- Flood Zone 3b (surface water): EA-modelled surface water flood extents for events with a return period of at least 1 in 30 years ($\geq 3.3\%$ AEP).

Map 4.2: Borough Surface water and ordinary watercourse flood extents



4.12 Further maps are included in the SFRA Level 1 Report showing both surface water flood extents and depths for each of the three return periods¹ and the ten surface water catchments and sub-catchments² mapped in Sutton's Surface Water Management Plan (SWMP) 2019. The SFRA Level 1 Report recommends that the 1 in

¹ Maps A2.2, A2.3 and A2.4 included in Appendix A to the SFRA Level 1 Report show surface water flood extents and depths for the 1 in 30 year (3.3% AEP); the 1 in 100 year (1% AEP) and the 1 in 1,000 year (0.1% AEP) scenarios respectively

² Maps A2.5 & A2.6 in Appendix A to the SFRA Level 1 Report show the borough's surface water catchments and sub-catchments

1,000 year (1% AEP) flood depth and extent data from the RoFSW can be used as a proxy for a 1 in 100 year (1% AEP) storm event with climate change.

Towards a Policy Approach

4.13 Based upon the evidence and analysis, the Council considers that it can move directly towards a draft policy approach for consideration as part of this Regulation 18 consultation. The draft policy is as follows:

4.C Draft Policy 4 on Flood Risk Management and Making Space for Water

The Council will work with developers, statutory undertakers, lead local flood authorities (LLFAs), the Environment Agency (EA) and local communities to manage flood risk from all sources in a sustainable manner by:

- (a) Identifying areas where flood risk issues exist now or are likely to exist in future with climate change on the basis of Sutton's Strategic Flood Risk Assessment (SFRA), the borough Surface Water Management Plan (SWMP), flood risk modelling undertaken by the EA for the Wandle, the Beverly Brook and the Pyl Brook and as part of the updates to the national Risk of Flooding from Surface Water Map (RoFSW);
- (b) Securing Grant in Aid funding from DEFRA; local levy funding from the EA and the Thames Regional Flood and Coastal Committee ; or Community Infrastructure Levy (CIL) as appropriate for the delivery of strategic flood alleviation schemes in order to reduce the number of properties at risk in accordance with Sutton's Local Flood Risk Management Strategy and Action Plan;
- (c) Delivering sustainable drainage (SuDS) retrofit, natural flood management and other urban greening measures within the public realm as part of estate regeneration schemes, wider urban renewal programmes, highway improvements and healthy streets initiatives funded by Transport for London (TFL) and pocket parks in line with the Mayor's SuDS strategy having regard to the London Sustainable Drainage Action Plan and surface water flooding hotspots and SuDS opportunity areas identified in Sutton's Surface Water Management Plan (SWMP);
- (d) Avoiding, reducing or mitigating flood risk to people and property by steering vulnerable developments away from the floodplain and other flood risk areas in line with the sequential approach by 'making space for water', and by maximising the multiple benefits of green space networks, ecological pathways and other nature-based solutions for SuDS, flood storage, urban cooling, habitat creation and biodiversity net gain (BNG), recreation and local amenity; and
- (e) Maximising opportunities to avoid, reduce and mitigate fluvial flood risk and working with statutory undertakers and other partners including the EA and the South East Rivers Trust to achieve 'good' status for the biological and physio-chemical quality of:
 - (i) the Wandle as part of the regeneration and restoration of the river in accordance with the aims of the Wandle Catchment Plan and the Wandle Valley Regional Park;
 - (ii) all other designated 'main rivers' within the borough identified in the Thames River Basin Management Plan, including the Beverly Brook and Pyl Brook.

For detailed flood risk maps based on the SFRA see Local Plan Appendix and Policies Map.

4.D Regulation 18 Consultation Questions



- A. Do you agree with the draft policy on Flood Risk and Making Space for Water?
- B. If you do not support the provisions of the draft policy, please give reasons and where possible suggest alternatives.

Issue 5 - Urban Greening and Climate Change Adaptation

5.A Introduction

- 5.1** With the UK's changing climate and the increasing frequency and severity of extreme weather events, such as heatwaves, heavy rainfall, storms and drought, the need to create climate resilient places is becoming an increasing priority. Without adequate planning for urban greening, sustainable drainage (SuDS) and other climate adaptation measures as part of new developments, estate regeneration, urban renewal programmes, highway improvements and other public realm interventions, the adverse impacts on public health and quality of life will increase significantly. These risks are compounded by the 'urban heat island' (UHI) effect which makes built up areas around 10°C warmer than rural areas during a heatwave.
- 5.2** At the same time, the loss of green space, the increased coverage of impermeable surfaces used for roads, roofs and pavements, and an outdated drainage system have left many parts of London exposed to the risk of flooding.
- 5.3** Many urban greening measures are available to developers which can be used to create climate resilient neighbourhoods by minimising the risks of overheating, flooding and other climate impacts. These range from the increased use of planting, green biodiverse roofs, SuDS measures and other 'nature-based solutions' as part of the design and layout of new buildings, to the creation of links between green infrastructure and flood risk management measures both at the neighbourhood/catchment scale and over wider areas.
- 5.4** The Government's 25 Year Environment Plan (DEFRA, 2019) sets out a long-term strategy aimed at making sure that all policies, programmes and investment decisions take into account the future extent of climate change over the next century. The Third National Adaptation Programme 2023-28 updates the Government's strategy for making the country more resilient to climate change. A number of key risks and actions are identified in relation to the built environment, infrastructure; the natural environment; health, and communities. These actions include changes to the NPPF, Building Regulations and improved reporting.
- 5.5** The Mayor's Environment Strategy (GLA, 2018) identifies a key aim for London and Londoners to be resilient to severe weather and longer term climate change impacts including flooding, heat risk and drought. In seeking to deliver the Mayor's ambition to make London the world's greenest global city (with a target of more than half of London being green by 2050) key ambitions are set to plant more trees, make green spaces more accessible, and ensure more green roofs and green features are designed into new developments.
- 5.6** Accordingly, Policy G6 of the London Plan 2021 on 'Increasing efficiency and resilience' requires that buildings are designed to adapt to a changing climate by increasing resilience to flooding and heatwaves, avoiding contributing to the urban heat island (UHI) effect and making efficient use of water. The importance of green infrastructure or urban greening in adapting to climate change is further highlighted in Policy SI 4 on 'Managing heat risk' which requires that development proposals

should mitigate overheating through design, layout, orientation, materials, promoting natural ventilation and the incorporating of green infrastructure.

- 5.7** Urban greening is a core element of ‘Healthy Streets’, a core principle underpinning the Mayor’s Transport Strategy, by helping to make streets part of a public realm network that is designed more for people than for vehicles.

5.B Context for Sutton

Sutton’s Climate Emergency Response Plan

- 5.8** Sutton’s Environment Strategy and Climate Emergency Response Plan 2019-25 identifies ‘increasing resilience to climate change’ as one of a number of key actions. The Local Plan is key to ensuring that all new developments are fully adapted to climate impacts by integrating blue and green space adaptation and other cooling measures from the earliest stages of project planning and design and to promoting urban greening measures and wider green space links across the borough. Bringing forward flood alleviation schemes and SuDS retrofit measures in the public realm also form an important part of the Council’s climate response.

Sutton’s existing blue and green space networks

- 5.9** The borough’s existing blue and green space networks - including its parks, wildlife habitats, trees, river corridors, continuous blocks of back garden land and green roofs - have multiple adaptation benefits in terms of quality of life, urban cooling, flood risk management, air and water quality, biodiversity and ecological resilience and healthier lifestyles. According to an analysis of London’s blue and green space cover commissioned by the GLA in 2018 and based on a combination of aerial imagery and land use datasets, total green and blue space coverage in the London Borough of Sutton was 50.94% against an average of 46.91% for London boroughs.
- 5.10** Further detailed land cover information is available from ongoing work being undertaken by the Council with Greenspace Information for Greater London (GiGL) to provide a map-based analysis of existing habitats across the borough and their associated biodiversity values and from an automated and continuously updated satellite mapping system³ which is currently being trialled by the Council in 2024-25.
- 5.11** Key components of the borough’s green space include large areas of open land within the Green Belt at Cuddington and Woodcote, 18 open spaces designated as Metropolitan Open Land (MOL), 71 Public Open Spaces, 26 Urban Green Spaces and 31 allotments. The restoration of Beddington Farmlands will create additional open space and urban green space. There are 54 Sites of Importance for Nature Conservation (SINCs), including 9 sites of ‘Metropolitan Importance’, occupying 668 ha or 15.3% of the borough. In addition, LB Sutton has the highest cover of back garden land of all London boroughs at 33% of the total land cover.

Climate risks and vulnerabilities in Sutton

- 5.12** Climate adaptation is a social justice as well as an environmental issue. Events such as heatwaves and floods have a disproportionate impact on vulnerable groups, such

³ the Council is currently trialling the ‘Intelligent Sustainability Management System’ developed by Ai-Dash Ltd for the purpose of identifying and mapping habitat types across the borough and for calculating associated baseline biodiversity values for defined areas

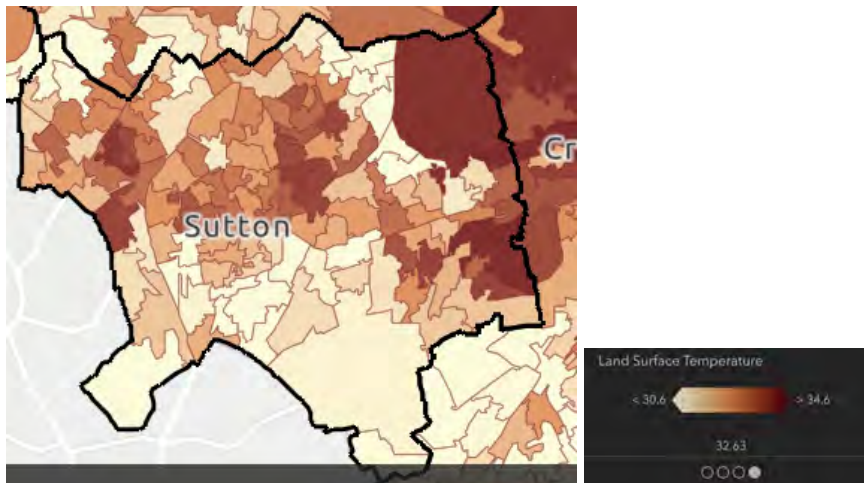
as the elderly, the young and people with health conditions. The COVID-19 pandemic revealed that many significant health inequalities are already present within the population and these are likely to be exacerbated by climate change.

5.13 Arising from a partnership project between the GLA and Bloomberg Associates, a series of London-wide climate risk maps were produced in March 2021, in order to identify areas that are most exposed to climate impacts, such as heat risk and flooding, and overlay these with areas with high concentrations of vulnerable populations.. These climate risk maps were subsequently updated in 2022, in order to include additional data layers at a finer geographic scale (LSOA boundaries). The findings are presented in a report entitled ‘A London Climate Risk - A Spatial Analysis of Climate Risk Across Greater London’ (GLA, Bloomberg, 2022)⁴ Similarly the Climate Just website⁵ enables users to highlight locations where climate disadvantage is at its highest.

Land surface temperatures

5.14 Summer heatwaves and the urban heat island effect can have a direct impact on people’s health and wellbeing. Department of Health research suggests that across the UK, over 7,000 people could die prematurely from the effects of heatwaves per year by the 2050s. Elevated urban temperatures can also impact local air quality and energy demand, with implications for net zero carbon targets, public health and climate resilience. Map 5.1 shows average land surface temperatures across the borough from 2016-20 (summertime/ daytime) down to Lower Level Super Output Areas (LSOAs) based on the outcome of GLA climate exposure mapping.

Map 5.1: Land surface temperature map for LB Sutton



Source: GLA climate exposure mapping 2022

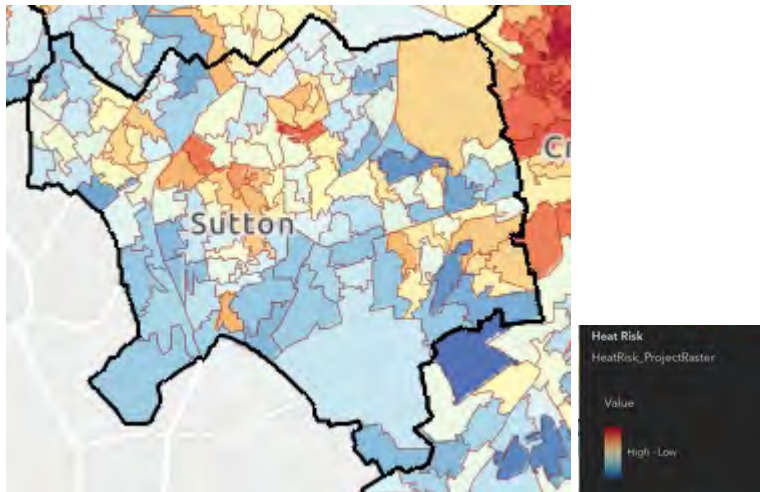
Heat risk mapping

5.15 Map 5.2 shows heat risk across the borough based on GLA climate risk mapping. This uses a composite score based on the proportion of the population under 5 and over 75; proficiency in English; income deprivation; socially rented housing; black and ethnic minority (BAME) groups; average land surface temperature; air pollution (PM_{2.5} and NO₂); tree canopy cover; and areas of deficiency in access to public open space.

⁴ the interactive London Climate Risk Map is available at <https://data.london.gov.uk/dataset/climate-risk-mapping>

⁵ the Climate Just website is available at <https://www.climatejust.org.uk/>

Figure 5.2: Heat risk map

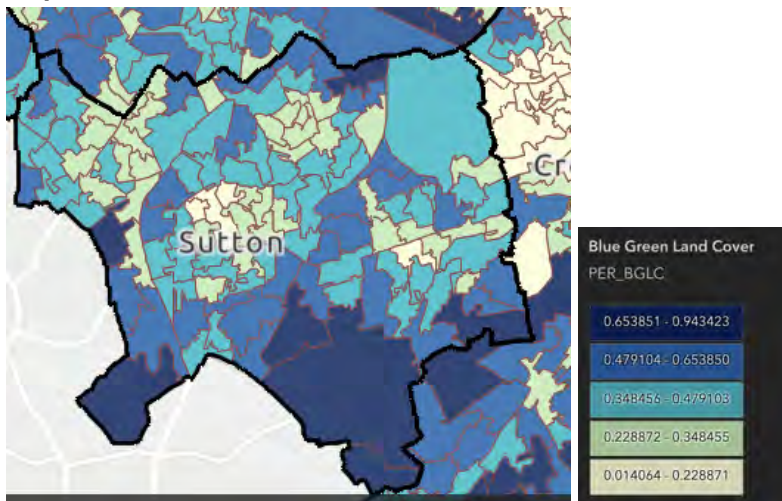


Source: GLA climate risk mapping 2022

Blue and green space cover

5.16 The Mayor’s Environment Strategy notes that London’s blue and green space cover, including parks, green spaces, trees, rivers, wetlands, green roofs and back gardens can reduce the impacts of climate change, improve air and water quality, promote healthier lifestyles, reduce car dependency and enhance biodiversity value. Map 5.3 shows blue and green cover across the borough based on GLA climate mapping.

Map 5.3: Blue and Green Cover within LB Sutton



Source: GLA climate risk mapping 202

Towards a Policy Approach

5.17 Based upon the evidence and analysis, the Council has established a series of policy principles for consideration as part of this Regulation 18 consultation. These are:

5.C Draft Policy Principles 5 on Urban Greening and Climate Change Adaptation

The Council will deliver a greener borough over the Plan period which is fully adapted and resilient to climate impacts, including heatwaves, flooding and drought, in line with the aims of the Mayor’s Environment Strategy 2018 and Sutton’s Environment Strategy and Climate Emergency Response Plan 2019 - 2025, by:

- (a) Identifying key green infrastructure assets and linkages across the borough, their benefits and opportunities for addressing climate impacts and other Local Plan objectives through strategic urban greening interventions and integrating them where possible as part of London’s wider green infrastructure network.
- (b) Protecting and enhancing the borough’s existing network of green and blue spaces, including strategic open land; public open space, sites of importance for nature conservation (SINCS), river catchments; green corridors, street trees, back garden land and green roofs, and its multiple benefits for urban cooling; biodiversity net gain (BNG); creating habitat pathways; sustainable drainage (SuDS); reducing exposure to air pollution; promoting walking and cycling and quality of life.
- (c) Creating new green infrastructure where it is most needed as an integral part of the design and layout of new developments; estate regeneration schemes; area-based renewal programmes, ‘healthy streets’ measures, community gardens and other public realm inventions such as pocket parks.
- (d) Meeting the following urban greening targets over the Plan period:
 - (i) increase overall blue and green space coverage across the borough ;
 - (ii) achieving at least a 50% coverage of blue and green space in Sutton Town Centre and each district centre; and
 - (iii) meeting Natural England accessible natural greenspace standards⁶.

5.D Regulation 18 Consultation Questions



- A. Do you agree with the draft policy on Urban Greening and Climate Change Adaptation?
- B. If you do not support the provisions of the draft policy, please give reasons and where possible suggest alternatives.

⁶ Natural England’s Accessible Greenspace Standards ENRR526 are available at <https://publications.naturalengland.org.uk/publication/65021>

Issue 6 - Biodiversity and Habitats

6.A Introduction

- 6.1** The climate emergency is closely linked to the accelerating loss of natural habitats and biodiversity across the world. Biodiversity is fundamental to human well-being, a healthy planet and economic prosperity, as well as delivering food security, clean air and water, flood risk management, recreation and cultural inspiration. The Kunming-Montreal Global Biodiversity Framework, adopted at the 2022 UN Biodiversity Conference (COP 15), sets out an ambitious vision of a world living in harmony with nature where “*by 2050, biodiversity is valued, conserved, restored and wisely used, maintaining ecosystem services, sustaining a healthy planet and delivering benefits essential for all people.*” The Framework identifies the need for urgent action to halt and reverse biodiversity loss in order to put nature on a path to recovery for the benefit of people and the planet. Among the Framework’s key elements are four biodiversity goals for 2050 and 23 action-oriented targets for 2030.
- 6.2** The UK Environment Act 2021 sets out an overarching ambition to halt species decline by 2030 and increase species abundance by the end of 2042. The Act strengthened the duty on Councils to conserve and enhance biodiversity and introduced a new system of Local Nature Recovery Strategies. One of the key provisions of the Act is the introduction of mandatory Biodiversity Net Gain (BNG) from 2024, under which the majority of new developments are required to deliver at least a 10% net gain on the site’s baseline value, either on-site or off-site, or by buying statutory biodiversity credits as a last resort. The Council’s preferred approach to applying BNG to planning applications and policy options is explored further in Issue 37 on Biodiversity Net Gain.
- 6.3** Accordingly, the NPPF (2023) requires proposed developments to contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to climate impacts. Local Plans should promote the enhancement of priority habitats and ecological networks and pursue wider opportunities for securing measurable net gains for biodiversity.
- 6.4** In 2023, the Government published details of how BNG will operate accompanied by updated planning practice guidelines, including on the preparation of BNG plans, the biodiversity metric and credits. A biodiversity metric has been developed by Natural England to provide ecologists, developers, planners with a way of assessing changes in biodiversity value resulting from development. The latest version (Biodiversity Metric 4.0) forms the basis of the Statutory Metric approved in November 2023 and the small sites (statutory) metric was introduced a short time afterwards. BNG became mandatory under the provisions of the Act in February 2024.
- 6.5** London Plan Policy G6 on ‘Biodiversity and access to nature’ sets out requirements for Sites of Importance for Nature Conservation (SINCs) to be protected; to identify ecological corridors; to address areas of deficiency in access to nature; support the conservation of priority species and habitats outside of the SINC network, and promote opportunities for enhancing them using Biodiversity Action Plans (BAPs).

6.B Context for Sutton

- 6.6** As green space has been progressively lost to development or reduced in quality, the range of wildlife habitats and species across London has continued to decrease in recent decades. Without positive action to not only protect important habitats but to deliver BNG, the number and diversity of important species will continue to decline.
- 6.7** The London Borough of Sutton has several important habitats, including the chalk spring fed River Wandle, the Beverley Brook and Pyl Brook. Chalk rivers are national priority habitats and support a rich diversity of species. Other key habitats include chalk grasslands, semi-natural woodland and wetlands. Sutton is home to a number of rare species such as the small blue butterfly, the flowering plant greater yellow rattle and stag beetles. Table 6.1 provides a breakdown of habitat types across the borough based on research undertaken by Greenspace Information for Greater London (GiGL) on behalf of the Council as part of a BNG pilot project undertaken in October 2023.

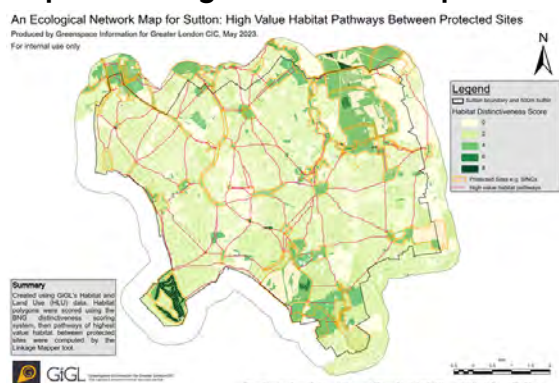
Table 6.1: Breakdown of Habitat Types in LB Sutton

Habitat Type	ha	%	Habitat Type	ha	%
Arable and horticulture	45.4	1.0%	Lowland dry acid grassland	34.5	0.8%
Broadleaved mixed & yew woodland	160.9	3.6%	Lowland meadows	2.0	0.04%
Built linear features	564.0	12.6%	Modified grassland	338.7	7.6%
Built-up areas and gardens	2,469.7	55.4%	Untranslatable habitat	126.7	2.8%
Coniferous woodland	1.21	0.03%	Unknown terrestrial veg	171.48	3.8%
Dense scrub	26.4	0.6%	Other lowland deciduous woodland	1.5	0.03%
Fen marsh and swamp	0.32	0.01%	Other neutral grassland	375.1	8.4%
Grassland	84.5	1.9%	Other woodland; mixed	20.6	0.5%
Intensive orchards	0.1	0%	Rivers and streams	15.6	0.4%
Lowland calcareous grassland	6.5	0.2%	Standing open water/canal	17.6	0.4%
Lowland dry acid grassland	34.5	0.8%	Total	4,461.5 ha	

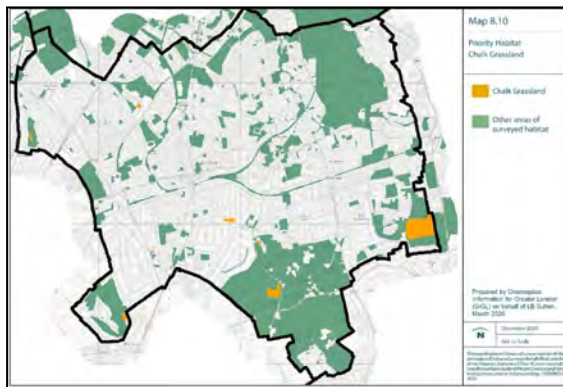
Source: Green Space Information for Greater London 2023 on behalf of LB Sutton October 2023

- 6.8** Map 6.1 is an ecological network map showing high value habitat pathways between protected sites and priority habitats are shown in Maps 6.2 to 6.5.

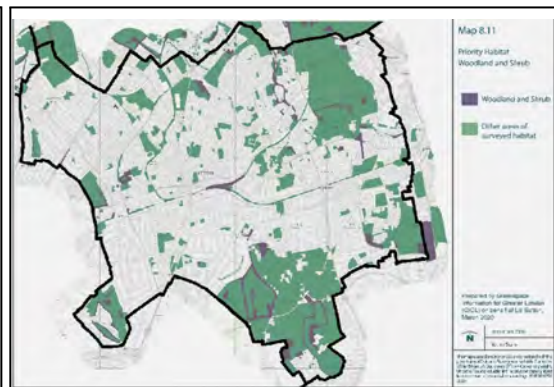
Map 6.1: Ecological Network Map for LB Sutton – High Value Pathways



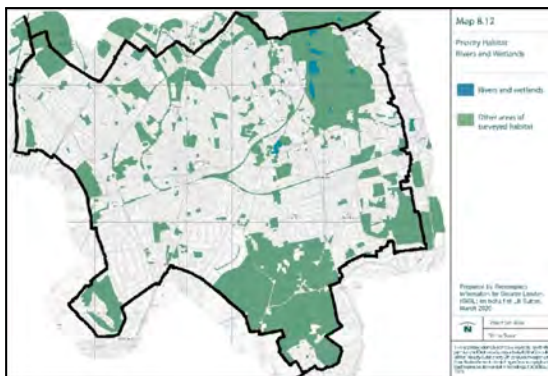
Map 6.2: Chalk Grassland



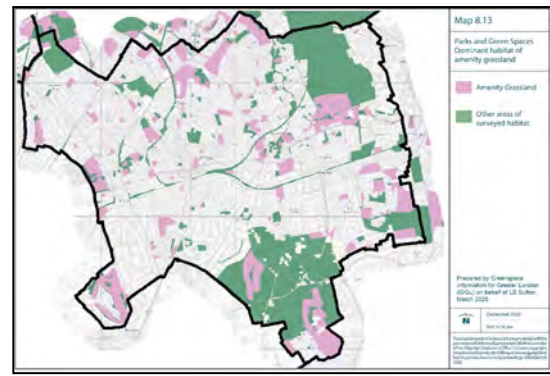
Map 6.3: Woodland and Scrub



Map 6.4: Rivers and Wetlands



Map 6.5: Parks and Green Spaces



6.9 The Council is currently trialling an automated satellite-based system⁷ which can remotely map land coverage and habitats across the borough and calculate a baseline biodiversity value for any chosen development site and for wider areas.

6.10 Sutton's current Biodiversity Action Plan (part of the Council's Parks and Open Space Strategy 2020-25) identifies the following targets: Creation of 1 hectare (ha) of new woodland; enhancement of 2 ha woodland at Queen Mary's Woodland and Roundshaw Woods; creation 2 ha of new chalk grassland; and enhancement of 12 ha of chalk grassland. A Local Nature Recovery Plan for Sutton is being prepared.

Towards a Policy Approach

6.11 Based upon the evidence and analysis, the Council considers that it can move directly towards a draft policy approach for consideration as part of this Regulation 18 consultation. The draft policy is as follows:

⁷as of May 2024, the Intelligent Sustainability Management System (ISMS) operated by Ai-Dash Ltd has analysed habitat cover and biodiversity value for a number of trial areas of the borough (970 ha), including Sutton Town Centre and the surrounding Area of Potential Intensification (API), Local Plan 2018 Site Allocations, Parks including Beddington Park and Beddington Farmlands

6.C Draft Policy 6 on Biodiversity and Habitats

The Council will:

- (a) Protect and enhance Sites of Importance for Nature Conservation (SINCs); green corridors; continuous blocks of back garden land; and other key ecological pathways including along the length of the River Wandle catchment and Beverly Brook.
- (b) Support the creation, enhancement and restoration of habitats throughout the borough; promote an overall increase in biodiversity value across the borough (as measured by the Statutory Metric for BNG); reduce areas of nature conservation deficiency and improve public access to nature over the Local Plan Review period in line with Sutton's Local Biodiversity Action Plan and, when introduced, the Local Nature Recovery Plan targets. Options for habitat creation and biodiversity enhancement targets are as follows:

Options	Targets
Preferred Option (Options 1-4 inclusive)	Set a range of strategic biodiversity targets to be delivered over the Local Plan period incorporating Options 1, 2, 3 and 4 (see below) and which are aligned with the relevant Local Nature Recovery Plan targets for LB Sutton.
Option 1: Habitat creation	Set updated targets for the creation and enhancement of key habitats including woodland, chalk grassland and/or other key habitats over the Local Plan period which are aligned with Local Nature Recovery Plan targets (ha).
Option 2: Protecting SINCs	Set targets for maintaining the number, total area and extent of SINCs within the borough and for reducing areas of deficiency to SINCs (see Policy 36 on Nature Conservation Sites and Green Corridors) over the Local Plan period.
Option 3: Increasing biodiversity value (borough)	Set an evidence-based target for achieving an uplift in the overall biodiversity value of the borough over the Local Plan period as measured by the Statutory Metric.
Option 4: Increasing biodiversity value (specific areas)	Set a number of evidence-based targets for achieving an uplift in the biodiversity value of specific areas of the borough where (i) the current baseline biodiversity value is low e.g. Sutton Town Centre or where (ii) opportunities exist for habitat creation e.g. Beddington Farmlands/ Beddington Park (Statutory Metric).

- (c) Secure the progressive restoration of Beddington Farmlands and promote its role as part of the Wandle Valley Regional Park and the Mayor's Green Grid.
- (d) Work with developers, the EA, the South East Rivers Trust and other strategic partners to deliver environmental enhancement projects on the River Wandle in line with the aims of the Wandle Catchment Plan, promote the naturalisation of river catchments, by taking all opportunities to de-culvert the River Wandle and smaller watercourses through making space for water and re-naturalising river banks wherever possible.
- (e) Ensure that proposed developments do not prejudice the implementation of Water Framework Directive measures contained in the EA's Catchment Planning system.

- (f) Work with local communities to create pocket parks, establish community gardens and plant trees where there is a deficit.
- (g) Ensure that all sustainable drainage (SuDS) schemes implemented as part of proposed developments; SuDS retrofit measures located within the public realm; flood alleviation schemes, 'healthy streets' measures and other highway improvements promote biodiversity by prioritising 'nature-based' solutions and by applying the Mayor's drainage hierarchy.

6.D Regulation 18 Consultation Questions



- A. Do you agree with the draft policy on Biodiversity and Habitats?
- B. Which policy option do you prefer and why?
- C. If you do not support the provisions of the draft policy, please give reasons and where possible suggest alternatives.

Issue 7 - Strategic Transport Infrastructure

7.A Introduction

- 7.1** London's public transport network suffers from inconsistencies and imbalances on the outer edges towards the Greater London boundary, and South West London is no exception. Poor orbital routes and low rail and bus frequencies, with historic and continued underinvestment in the public transport network in the area, and poor connectivity across the Greater London boundary to neighbouring boroughs in Surrey and Sussex, have led to high levels of private car use for commuting and other purposes.
- 7.2** The 2018 Mayor's Transport Strategy (MTS) overarching aim, for 80% of all trips in London to be made by sustainable means (walking, cycling or public transport) by 2041, presents a particular challenge for many Outer London boroughs. Demand for land for housing and industry and high levels of existing development, together with the impact of Green Belt and public open space requirements, mean that a mixed approach is needed to accommodate movement of people and freight. This will be a combination of improved public transport opportunities and strategic highways upgrades to recognise the continued need to accommodate private vehicles in Outer London, freight movements and improved safety.
- 7.3** Pre-Covid, public transport demand hit an all time high in terms of rail and bus journeys, with private car trips and mileage decreasing. During the pandemic this reversed, and as of October 2022, representative average daily demand for bus and rail had recovered to around 84% of the pre-pandemic levels. The 2021 Census showed a significant increase in working from home, and a switch in predominant trip types from commuting to leisure and off-peak travel. It remains to be seen whether this trend continues to be the case going forward.

7.B Context for Sutton

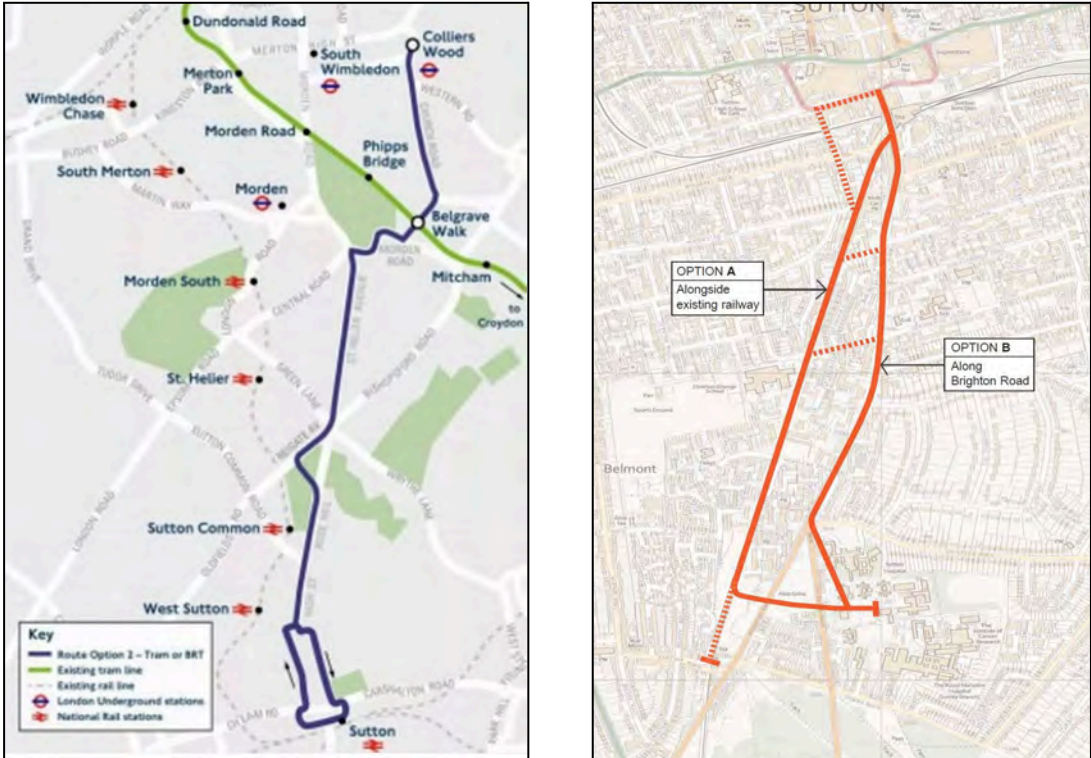
Sutton Link (Tramlink)

- 7.4** Sutton Town Centre remains the primary focus for housing and retail growth in the borough in line with the Adopted Local Plan (2018), London Plan (2021) and Mayor's Transport Strategy. However, historic low capital funding allocations for transport infrastructure to accommodate this growth means that there is a risk of unacceptable levels of congestion on the roads and so, even with the expanded Ultra-Low Emission Zone (ULEZ) in place, damage to the local environment.
- 7.5** Sutton is only one of three London boroughs which is not directly served by either the London Underground or Overground, and while the Croydon Tramlink passes through the north eastern edge of the borough, there is only one stop at Beddington Lane.
- 7.6** The Council has worked closely with TfL for a number of years to extend Tramlink into the borough, to connect Sutton Town Centre to the network and improve

connections with Wimbledon and Crossrail 2. Public consultation has shown strong support for a tram-based solution, and an alignment was safeguarded within the Adopted Local Plan (2018). The Mayor’s Transport Strategy (2018) and London Plan (2021) included the Sutton Link tram scheme as a project for support, subject to development and funding.

7.7 The Sutton Link scheme comprises two phases. Phase 1 is a route from Colliers Wood to the southern end of Sutton Town Centre via Merton and Rosehill, close to Sutton rail station. Phase 2, if built, would continue south to the London Cancer Hub (LCH), with safeguarded alignments via either Brighton Road or the existing Epsom Downs rail line through Belmont.

Figure 7.1 - Sutton Link Alignments (Phases 1 and 2)



Source: TfL (Phase 1 link to Sutton TC) and LBS Local Plan 2018 (Phase 2 to the LCH)

7.8 Phase 1 was consulted on by TfL in 2019 which showed clear support for both a tram solution (as opposed to a bus option) and the Colliers Wood route. Phase 2 however presents a number of key issues with the alignment, including restricted widths and tight turning radii onto Brighton Road from the town centre gyratory, and a steep gradient between the Epsom Downs rail line and the LCH site (if that option was chosen). The latter would also require careful signalling and, if needed, separate low platforms on the railway route to accommodate the low floor trams used across the Tramlink network.

7.9 In 2019, the funding requirement for Phase 1 was approximately £560m, with commitments of £79m from TfL and £36m from Sutton and Merton Councils, leading to a gap of £440m. Potential other funding sources were identified, including from Government. Following the pandemic in 2020 and the impact on TfL’s overall

funding position, the scheme was paused on affordability and business case grounds, and there is not currently a TfL funding commitment to the scheme.

- 7.10** Given the public's positive response to a tram-based solution when TfL consulted on the proposals in 2014 and 2019, as well as the Council's own consultations, the Council's preferred option is to retain the safeguarded alignment for Phase 1 of the scheme, and to continue to seek a cost effective solution for delivery of the extension within the plan period. Whilst Phase 2 of the safeguarded route was always a longer term project, and given the complexities and costs of Phase 1 will be even more challenging, the Council will seek to retain the Phase 2 route alignment, subject to the outcome of consultation and the development of the Belmont rail enhancement scheme.

Rail

- 7.11** In the Adopted Local Plan (2018), the Council expressed support for enhancement of rail service frequencies and associated infrastructure improvements across the suburban rail network to provide a more 'metro style' service (similar to the London Overground) and improve orbital rail connections between other South London centres. The Adopted Local Plan (2018) also supported construction of Crossrail 2 and any associated transport improvements that improve linkages to Sutton Town Centre and the London Cancer Hub.

- 7.12** The Council has received Levelling Up Fund to deliver an improved rail service to Belmont, which when completed will double train frequency to 4 trains per hour. This was originally an element of the TfL Strategic Case for Metroisation published in 2019, which also included turnbacks at Cheam and Wallington and increases in train frequency to Sutton up to 10 trains per hour. The Council will continue to champion the case for improved rail frequency in order to meet the Mayor's Transport Strategy targets for sustainable travel.

- 7.13** In 2018 Network Rail developed the Croydon Area Remodelling Scheme (CARS) which would, if delivered, resolve trainpath conflicts at the Selhurst Triangle between the Brighton Mainline and the Southern Rail network, and so allow more trains to run while removing many of the causes of congestion to services through Sutton. Development of the CARS scheme was paused by the Department for Transport in October 2023 following a reassessment of national investment priorities for the railway, but many of the issues the scheme is intended to address are still affecting journey reliability in Sutton. As such the Council will continue to lobby for delivery as soon as possible.

Crossrail 2⁸

- 7.14** The delivery of future key regional infrastructure schemes such as Crossrail 2 will now be unlikely to occur before the end of this plan period (2041), and there are no other national or regional proposals being proposed to provide any additional major public transport infrastructure within the borough. If built Crossrail 2 would not serve Sutton directly, the nearest interchanges being Worcester Park and Wimbledon, but would act as a further incentive to enhance local connections

⁸ <https://crossrail2.co.uk/discover/>

including bus and Sutton Link. The Council will therefore continue to engage with TfL and the Crossrail 2 team and support delivery of the scheme.

Bus and Coach

- 7.15** The TfL-led Sutton/Croydon Bus Review has been in progress since 2016, and has delivered a number of enhanced bus routes in 2023 and 2024 to support the impact of the London Cancer Hub in Belmont. Alongside this, the TfL bus fleet serving Sutton will be almost completely zero emission by 2025. TfL have confirmed that these new services do not mark the conclusion of the Bus Review, and the Council will continue to lobby for future bus corridor enhancements and improvements to address congestion and constraints on key routes. These include issues such as the Croydon to Kingston Superloop express route used by the SL7, and areas of low bus frequency and poor service reliability such as The Mount in Coulsdon. With the London-wide ULEZ now in effect, the Council will also seek improvements in bus connectivity across the Greater London boundary to support recruitment and retention of jobs in Sutton.
- 7.16** Pre-Covid, the borough also benefited from two regular National Express coach services between Victoria Coach Station and Gatwick Airport, and between Croydon and Brighton via Gatwick, both with stops in Rose Hill, Sutton Rail Station and Belmont. However, following the pandemic National Express undertook a review of their services through South London, and determined that low passenger numbers and worsening congestion on South London roads meant that the routes through Sutton were no longer commercially viable. Victoria to Gatwick, Brighton and Worthing services are now routed via Heathrow and the M25, bypassing South West London altogether. In order for any service to be reinstated it is highly likely that National Express would seek a significant level of subsidy from all boroughs that the routes would pass through.

Strategic Road Network

- 7.17** Of the 268 miles of road length in Sutton, only 18 miles are designated as principal 'A' roads. The majority of this is taken up by the north/south Transport for London Network (TLRN) 'Red' routes on the A24 and A217, linking Central London to the GLA boundary and M25, and the A232 east-west TLRN 'Red' route across the borough from Epsom to Croydon and Bromley. These are supported by Tier 2 London Distributor roads, including the A237 linking Hackbridge and Wallington to Merton and the Surrey boundary, and the A2048 from Cheam through Worcester Bark towards Kingston. The remainder are just under 18 miles of 'B' road, including the B272 through the Beddington Strategic Industrial area, and 232 miles of local estate and other 'C' or unclassified roads.
- 7.18** Although these principal roads are identified as strategic routes of national and/or regional importance, the history of Sutton as a borough means that some of the routes, particularly the A232 through Carshalton, have evolved from village roads and so suffer from width restrictions and tight bends which cause capacity and congestion issues, with few if any options for widening or alternative routes through what are often densely populated urban areas. These constraints, coupled with the London Plan / MTS strategies for sustainable travel and reducing dependence on the private car, mean that the borough's strategic transport focus is on public

transport, walking and cycling, with no major road or traffic schemes projected for the life of the Plan other than works within the Sutton Town Centre gyratory (see also Issue 9).

Towards a Policy Approach

7.19 Based upon the evidence and analysis, the Council has established a series of policy principles for consideration as part of this Regulation 18 consultation:

7.C Draft Policy Principles 7 on Strategic Transport Infrastructure

The Council will lobby and work with Transport for London (TfL) and other stakeholders to deliver the following strategic improvements to the transport network, and where necessary safeguard land to ensure the scheme(s) can be implemented:

- (a) The development and construction of a cost effective extension of the existing Tramlink network to Sutton Town Centre, using the alignments set out by TfL during the Sutton Link consultation in 2019. The Council proposes to continue safeguarding the alignments between the borough boundary with LB Merton, Sutton Town Centre and the London Cancer Hub as shown on the Policies Map and in Map 7.1 above.
- (b) Completion of the Belmont Rail Improvement project to increase capacity and frequency of rail services to Belmont Station, with associated sustainable travel improvements to improve access to the London Cancer Hub, Royal Marsden Hospital and proposed new Special Emergency Care Hospital.
- (c) The enhancement of rail service frequencies and associated infrastructure improvements across the suburban rail network to provide a more metro style service (similar to the London Overground) and improve orbital rail connections between other South London centres.
- (d) The construction of Crossrail 2 and any associated transport improvements that improve linkages to Sutton Town Centre and the London Cancer Hub.
- (e) Further improvements to strategic bus corridors in the borough, and service improvements to address areas of low frequencies and/or bus reliability.

7.D Regulation 18 Consultation Questions



- A. Do you agree with the retention of the safeguarded alignment for Sutton Link? Should the Council retain the safeguarding for Phase 2?
- B. Do you agree with the draft policy on major transport proposals?
- C. If you do not support the provisions of the draft policy, please give reasons and where possible suggest alternatives.

Issue 8 - London Cancer Hub

8.A Introduction

- 8.1** The London Cancer Hub (LCH) is an important development site for the borough, and represents a once-in-a-generation opportunity to take the economy of Sutton in a new direction. The core aim is to consolidate the LCH site as Europe’s leading life science district specialising in cancer research, treatment, and enterprise. Further investment and development will create a state-of-the-art life science campus dedicated to research and treatment of cancer.
- 8.2** The delivery of the LCH is shaped by a number of partners and stakeholders. The principal partners are: London Borough of Sutton (LB Sutton), Royal Marsden NHS Foundation Trust (RM), the Epsom and St Helier University Hospitals NHS Trust (ESTH), the Institute of Cancer Research (ICR), the Harris Academy (HA), and Aviva Capital Partners / Socius.

8.B Context for Sutton

- 8.3** The LCH site is a Council priority, and significant progress has been made since the initial concept was outlined in 2014. The concept has been refined over time, and the site itself has also changed, with certain parcels of land being built on.
- 8.4** From a planning perspective, the Adopted Local Plan (2018) established the site’s status through ‘Policy 2’, and the Site Allocation ‘LCH1’. These policies will need to be reviewed and updated, in recognition of the changes that have taken place on site, and in light of the fact that the Council is undertaking the Sutton Local Plan Review.
- 8.5** Key milestones for the LCH site are:

Date	Milestone
July 2014	Council endorses the principle of creating a “World Class Life Sciences Campus” in Belmont. The initial idea was created through the Sutton for Life Partnership Board and identified the opportunity to utilise the former Sutton Hospital site to expand delivery across the rest of the site.
September 2016	Council endorses a detailed ‘London Cancer Hub Development Framework’. This defines the principles for the LCH, which include the aims to deliver 280,000m ² of modern floorspace (of which at least 100,000m ² of commercial space to achieve critical mass); 10,000 new jobs; and research buildings, hospital facilities, a school, restaurants, cafes, and hotel accommodation for visitors and patients.
February 2018	Council adopts the Local Plan (2018 - 2031) which includes Policy 2 specifically for the LCH, and the Site Allocation LCH1.
October 2020	Government announces the New Hospital Programme, which includes a proposal by ESTH for a ‘Specialist Emergency Care Hospital’ (SECH) at the former Sutton Hospital and reconfiguration of Epsom and St. Helier Hospitals.

November 2021	Council announces the completion of the Innovation Gateway. The Innovation Gateway provides 585 sq.m. of flexible incubator space to life science enterprises, with around 325 sq.m. of high-specification laboratory space.
September 2022	Council set out an Options Appraisal for the next steps to deliver the full LCH vision. The Council set out six potential delivery options, with the recommended option being a 'Long Leasehold Sale'. This would result in a minimum 150-year lease being sold by the Council in return for an up-front payment, plus potentially a share of rental income once new buildings are leased. The recommendation was approved by the Council.
June 2023	The Council confirmed that it had secured £14.1 million from the Levelling Up Fund for rail improvements at Belmont Station to increase train frequency, and improve the walking and cycling route and public realm between Belmont Station and the LCH. The Royal Marsden opens the Oak Cancer Centre.
September 2023	Council formally endorsed Aviva Capital Partners and Socius as its preferred delivery partner for the LCH land owned by the Council.
December 2023	Council agreed the sale of a long leasehold of the Council land to Aviva Capital Partners, working with their development partner Socius.
January 2024	Aviva and Socius begin preparing a planning application for Phase 1 of their proposal for the site

8.6 Whilst the Council has made significant progress in advancing the proposals for the LCH, there remain challenges and uncertainties regarding the site. These include: overcoming fragmented land ownership; confirming the acceptable land uses that can take place on the overall site; the aspiration for all sites to be developed under a coordinated site-wide masterplan; the requirement for improved connectivity and improved transport infrastructure across the site; and confirming whether the growth at LCH will contribute towards meeting the identified 'needs' in the borough.

8.7 Figure 8.1 shows the current land ownership across the LCH site, and highlights the way this influences the redevelopment of different parcels of land within the overall footprint of the site, as well as the implications for the specific parcel of land previously owned by the Council.

Figure 8.1: London Cancer Hub Latest Ownership (2024)



8.8 Based upon the latest proposals for the LCH site, the following key issues have been identified. These issues will shape the Council’s final policy position on the long term future of the LCH site.

8.C Key Issues for the London Cancer Hub

Agreeing a Shared Vision / Masterplan

8.9 The overarching aim for the LCH site remains to deliver a state-of-the-art campus specialising in life science. The site is already home to the Institute of Cancer Research, Royal Marsden NHS Foundation Trust, the Epsom and St Helier University Hospitals NHS Trust, and the Harris Academy and has been shaped by more recent developments, including: Innovation Gateway, Centre for Cancer Drug Discovery, Centre for Molecular Pathology, Maggie’s Centre, and Oak Cancer Centre. This critical mass represents a unique advantage and developing the additional land parcels provides an opportunity to further enhance its status.

8.10 However, a successful outcome requires the coordination of short term opportunities with the longer term redevelopment of the overall LCH site. In the short term, opportunities linked to the site now leased by Aviva Capital Partners / Socios, and the proposal for a Specialist Emergency Care Hospital (SECH) on land owned by ESTH, must help deliver long lasting benefits for the overall LCH site and the surrounding community.

8.11 Each development proposal will need to consider how to address and mitigate its own unique issues as well as site-wide matters, such as transport infrastructure, open and green space provision, public realm, improving connections to surrounding residential areas, existing local centres and community facilities.

8.12 To enable this, the Council considers that all landowners, developers, statutory bodies, stakeholders, and interested parties must work towards a collective and

agreed vision and shared development masterplan for the whole site. Whilst individual sites and land parcels may be built out under different development agreements, each and every scheme must contribute towards the broader ambition for the whole of the LCH site. Individual development schemes will be expected to assess and understand their individual and cumulative impacts, and mitigate those impacts whilst also contributing towards improvements that benefit the overall LCH site.

Confirming the Scale and Quantum of Development

Understanding the Demand for Life Science / Lab Space / Office Space

- 8.13** Establishing a life science hub is considered a viable approach. The LCH site is home to the ICR, which is focused on translational cancer drug discovery and early-stage development; and the RM, which is known for cancer treatment. As such, the LCH site is a logical location for the creation of a life science campus. The wider LCH site has also recently seen the take-up of incubator space at the Innovation Gateway, providing proof of concept and demonstrating that the LCH site is a viable location for this sort of activity.
- 8.14** Companies in the life science sector are moving away from traditional standalone developments in out-of-town locations. Instead, they are seeking to co-locate in new innovation districts and campuses, often close to universities and institutions that are already world-renowned for pioneering new approaches in science, medicine and healthcare.
- 8.15** Life science is increasingly taking place in ‘open collaboration’ between academics, charities, and other partners such as NHS hospitals to develop their ideas and scale up their discoveries. The LCH represents an opportunity to create a campus that will enable companies to co-locate their teams within a global centre for cancer research and innovation – opening up new opportunities to collaborate with world-class researchers and clinicians at the ICR and the RM.
- 8.16** Support for the concept of a life science campus at the LCH is also drawn upon research from MedCity, which explores the demand for life science. MedCity’s “*London Life Sciences Real Estate Demand Report*” (2021)⁹, as well as further analysis by Cushman & Wakefield (2023) highlighted that there is a severe shortage of lab space in London¹⁰. London is generating huge growth for the UK life science sector, but continues to suffer from a low inventory of commercial lab space, with rising rents demonstrating a tight market. The LCH site offers an opportunity to meet the rising demand.
- 8.17** Given the work that has taken place in the background to position the site as a life science campus, it is important that it now delivers. The Council will take a strong stance that development and floorspace built on the site will be for life sciences,

⁹ MedCity - London Life Sciences Real Estate Demand Report (2021): [MedCity - London Life Sciences Real Estate Demand Report \(2021\)](#)

¹⁰ Cushman & Wakefield Analysis (March 2023): London Borough of Sutton’s London Cancer Hub - Investment Opportunity Brochure: [The London Cancer Hub Investment Opportunity Brochure](#)

laboratory space, and complementary office space. Where required, the Council will use its powers to control and secure this type of development.

Proposal for the London Cancer Hub Site

- 8.18** The decision to approve a long-lease sale of the Council-owned land now means that Aviva Capital Partners and Socius are preparing a development proposal for the 4.8 hectare parcel of land in the centre of the LCH site.
- 8.19** The Council is keen to ensure that the LCH site delivers on the long-term ambitions that have been carefully curated by the Council and other stakeholders over the last 10 years. On this basis, the Council proposes to continue with the Adopted Local Plan position, which is that residential development is not acceptable on any part of the LCH site. This remains the Council's preferred position because it does not want to undermine the intended purpose and operational use as a life science campus.
- 8.20** Any 'accommodation' provided would have to be clearly ancillary to the function of the LCH site, and be inextricably linked to its operation. This means that accommodation would only serve the staff, clinicians, patients, and visitors of patients. All accommodation would be subject to strict criteria to ensure that occupancy is restricted, and avoid any unintended consequences for it becoming available for other occupants.
- 8.21** A similar issue arises in relation to how the Council should consider the provision of commercial / employment floorspace at the LCH site.
- 8.22** The purpose of the LCH site is to capitalise on collaborating with the other institutions on the site to achieve a world-class life science campus. As such, any development proposal will need to ensure that the employment floorspace delivered is of the right size, format, and quality to achieve the aim. Given the evidence and background data indicating significant market demand for life science floorspace (laboratory and office), the Council expects that development proposals will explicitly design and plan (short term and long term) for the delivery of the necessary floorplates, building heights, ancillary spaces, energy / utility / service provision, and amenity spaces to realise a world-class product.
- 8.23** The Council will set out a series of criteria and conditions as to the type, format, and quality of floorspace and building that would be expected as part of any development, so that it delivers the specific requirements for a life science campus.
- 8.24** The Council is aware that these represent significant issues and acknowledges that these have implications not only for the Council, but for investors, developers, stakeholders, and the local community. That is why the issues and options have been set out in Section 8D to ensure there is an appropriate forum to consider the issues associated with delivering residential accommodation and employment floorspace on the site.

Proposal for the Specialist Emergency Care Hospital

- 8.25** In October 2020, the Department of Health & Social Care announced 48 sites within its 'New Hospitals Programme' (NHP), which included a proposal at Epsom and St.

Helier Hospital. The proposal by ESTH, is to deliver a new Specialist Emergency Care Hospital (SECH) at the old Sutton Hospital site, as well as reconfiguration of the Epsom and St. Helier Hospitals. The SECH aspect will integrate six major health services on one site and will need to be designed via the NHP's Hospital 2.0 concept.

- 8.26** The specific proposals for the SECH have altered since the initial announcement in October 2020; and in May 2023, the ESTH announced that the new hospital “*won't be ready until 2027 at the absolute earliest*”¹¹. However, ESTH remains part of the NHP with delivery expected in the mid-2030s.
- 8.27** The Council understands from dialogue with ESTH that there will be a refresh of the 2020 Outline Business Case (OBC) during 2024, with the aim of submitting a planning application to the Council in late 2024, with the intention to start construction of the SECH during early 2026.
- 8.28** ESTH is collaborating with all other landowners, including strengthening a new relationship with Aviva Capital Partners and Socius; as well as the RM and ICR. ESTH is also liaising with RM over their proposals for building a multi-storey car park, which is likely to require the use of land belonging to RM.
- 8.29** Given the specific requirements of the NHP and Hospital 2.0 concept, ESTH commissioned a feasibility study in Autumn 2023 for their design team to explore options for developing a revised design of the SECH. The Council continues to liaise with ESTH over the plans for the SECH.

Aligning LCH Employment Growth with the Council's Economic 'Needs' Assessment

- 8.30** The plans for the LCH site include considerable employment floorspace, primarily linked to life science and taking the form of laboratory and complementary office space. However, under the Adopted Local Plan (2018), the jobs and floorspace planned for LCH are treated as a separate figure from the rest of the borough's plans for economic growth. The principles about whether this approach is still appropriate, or whether the development delivered at LCH could or should contribute to the overall needs of the borough, are set out in Section 8D below.
- 8.31** The Council's ELENA (2023) has assessed the borough's economic 'needs' through to 2041. The ELENA notes that the Council has an identified need to provide 186 office jobs per annum, which equates to approximately 60,000 sq.m. of new office floorspace over the plan period.
- 8.32** However, given the uncertainties in the office market, the ELENA suggests that any new policy should focus on the short-to-medium term, and make provision for 1,000 office-related jobs and / or 15,000 sq.m. to cover the first five years of the plan period.
- 8.33** As with residential development, there are positives and negatives to the idea of including employment floorspace delivered at the LCH site within the Council's overall figures. Positives include the development helping the Council to meet a challenging office floorspace figure that the market is struggling to deliver at

¹¹ Epsom and St.Helier University Hospitals NHS Trust - An update on our Building Your Future Hospital plans (17 May 2023): [An update on our Building Your Future Hospital plans | News and events at Epsom and St Helier hospitals](#)

present, as well as providing new Grade A floorspace required by many occupiers to satisfy the Environmental, Social and Governance (ESG) credentials. Negatives include relocating major office floorspace provision away from Sutton Town Centre to an inherently less sustainable location, and the concern that any office floorspace at the LCH site could morph over time into non-life science related uses and dilute the aim for the site.

Agreeing Key Design Parameters

- 8.34** The level of ambition for the LCH site is high. The concept of a life science campus is predicated on creating a world class environment - both in terms of buildings/office/lab space, but also in terms of the supporting environment and overall 'ecosystem'. Excellence as standard will be necessary to attract world class individuals and businesses. As such, the design quality and sense of place at the LCH site must be of an equally high standard.
- 8.35** The primary way to ensure design excellence, and an overall level of coherence, is for all landowners and development partners to agree to an overarching design masterplan for the site. The design masterplan will explore common issues, including: access, connectivity, sustainable and active travel; wayfinding and route prioritisation; parameters for landscapes and biodiversity; activating public and open spaces; building heights, massing and orientation; building materials, energy efficiency, and ESG standards; integration with the surrounding community and built environment; impact on internal and external views; and the creation of focal points and landmarks.

Transport & Accessibility

Creating an Effective Sustainable Transport Strategy for the Site

- 8.36** Given its location and existing highways challenges, it is vital that an effective sustainable transport strategy is created for the site. Importantly, any sustainable transport strategy must reflect on the current status of the Tramlink scheme/ Sutton Link, noting that TfL has paused the scheme. As set out in Issue 7 on Strategic Transport Infrastructure, the Council proposes to continue to safeguard the route alignment for Phase 1 of the proposed Tramlink scheme, which would see the tram delivered to Sutton Town Centre, with the alignment for Phase 2 being retained subject to the outcome of consultation. Any development proposals at the LCH must understand what alternative sustainable transport solutions could be delivered, and how those solutions could integrate with Phase 1 of Tramlink.
- 8.37** Elsewhere, the Council has been successful in securing over £14m from the Levelling Up Fund to double the frequency of train services at Belmont Station. This is scheduled to be in place by 2026. This represents an important step towards delivering public transport capacity and reducing reliance on using the private car to access the LCH site. Additional monies will also be used to improve active travel connections and wayfinding to Belmont Station.
- 8.38** The Council considers that more can be achieved, and that delivering sustainable travel will be key to unlocking the full potential of the LCH. The transport vision for the development is to create a place that is in keeping with 'Healthy Streets' principles,

and which feels well connected and easily accessible by public transport, accommodating essential car movement without cars dominating the landscape.

8.39 The Council expects landowners, developers, TfL, GLA, and the Council itself to collaborate and explore the full range of options to identify the best sustainable transport strategy for the site. The bus strategy is especially important as the funding for any tram extension is uncertain at this time, and buses can complement the strategy going forward. The delivery of bus services, whether it is high frequency shuttle buses, or re-routing TfL bus routes through the site, may represent the most convenient and cost-effective way to get staff and visitors onto public transport. However, the relevant transport assessments and mitigation strategies must confirm the most optimal solution.

Understanding Individual and Cumulative Transport Impacts

8.40 Previous reports outline that a range of interventions are required to overcome the current transport capacity constraints. These interventions vary in cost, complexity, benefits, and feasibility. As with many of the aspects relating to the LCH site, there is a need to consider the transport and accessibility issues of individual land parcels, and the overall LCH site, at the same time.

8.41 Given the Local Plan policy and proposed Site Allocation will cover the whole of the LCH site, the Council will require interested parties to agree on the baseline transport conditions that are to be assessed, coordinate data collection, undertake traffic modelling (including agreeing the assumptions within the modelling), and engage with relevant statutory authorities [Transport for London (TfL), Greater London Authority (GLA), and Surrey County Council (SCC)] to agree the approach and agree mitigation.

8.42 In the short-to-medium term, it is important that the transport impacts of any planning application(s) made by Aviva Capital Partners/Socius are considered alongside any application for the SECH. The assessment of impacts should consider the cumulative effects of trips to the site, access considerations, construction impacts, and car parking.

8.43 More specifically, transport assessments for the site(s) will need to thoroughly assess the impacts on the key highways / junctions, especially: Belmont Rise / Brighton Road; Brighton Road / Station Road; Brighton Road / Downs Road; Downs Road / B2218; Downs Road and LCH site, at Royal Marsden Hospital entrance; Downs Road / Banstead Road South; Brighton Road / B2218 Cotswold Road; Brighton Road / Chiltern Road; and the B2218 Cotswold Road and LCH site, at Institute of Cancer Research entrance / proposed entrance for the new development site.

8.44 The requirement for any highway mitigation measures should be developed and funded jointly based on the conclusions of the transport assessments. The promotion of sustainable travel is a key element to the success of the overall development of the site, including the introduction of appropriate physical measures and promotion through travel planning documents.

Car Parking Strategy

8.45 A successful sustainable transport strategy together with delivering active travel routes should reduce the reliance on private car use and the impacts on the highway network. However, the sustainable transport strategy for the development needs to be supported by a car parking strategy that rationalises parking across the overall site. There are two elements to the car parking strategy:

- i. Firstly, the need to balance the appropriate level of car parking that meets the needs of staff and visitors whilst at the same time does not encourage private car use when alternative modes are available.
- ii. Secondly, the design and location of the car parking needs to be carefully considered to maximise the use of land and minimise the risk of car movements from dominating the development.

8.46 Any designs for car parking need to be adaptable (capable of being converted into other uses or removed to enable new plot development) in the future if demand for car parking reduces.

8.47 The strategy for car parking must be prepared in direct collaboration with ESHT and their plans for a multi-storey car park as part of building the SECH. In addition, dialogue must take place with the ICR and RM to understand their car parking usage and requirements and deliver a coherent car parking strategy for the site.

8.48 There are hotspots of on-street parking in the surrounding area, such as around Belmont Station and Belmont Village; in proximity to the Harris Academy; in Shanklin Village; and at Banstead Road South. The Council continues to monitor on-street parking levels to understand what is contributing towards this uplift. The car parking strategy for the LCH site must consider the implications for the surrounding residential areas and on-street parking.

Other Infrastructure Requirements

8.49 Power supply remains crucial for the development of a life science campus that has a significant requirement for Research and Development use. Early conversations with UKPN point to the need for a new 33KV primary substation as the best option to support long term site development. As part of the site-wide masterplan for the LCH site, it is expected that all landowners and developers should liaise with the Council and other parties to understand whether the site could connect to a future Decentralised Energy Network.

8.50 Given the flagship nature of the LCH site, all development proposals are expected to maximise the use of low carbon construction techniques and materials. It is expected that the campus will be fossil-fuel free, drawing energy from renewable electricity as well as generating on-site solar energy.

8.51 As per the national policy requirements, the LCH site is expected to deliver a minimum 10% Biodiversity Net Gain (BNG), as discussed in Issue 37, and any investment in blue and green infrastructure should be in accordance with the overarching masterplan.

Towards a Policy Approach

8.52 Based upon the evidence and analysis, the Council has established a series of policy principles for consideration as part of this Regulation 18 consultation. These are:

8.D Draft Policy Principles 8 on the London Cancer Hub

- (a) The Council supports the ambition for the LCH to be a state-of-the-art life science campus specialising in cancer research, treatment, and enterprise. To facilitate the delivery of the LCH site, the Council will set out a specific policy and also identify it through a Site Allocation in the Local Plan Review.
- (b) The Council expects a co-ordinated and coherent approach to the overall redevelopment of the LCH site, which includes land owned or operated by the Council, Harris Academy, Institute of Cancer Research, Royal Marsden Hospital, Epsom and St.Helier University Trust, and Aviva Capital Partners.
- (c) The Council expects that all interested parties, landowners, and developers will collaborate to deliver an integrated masterplan for the whole of the LCH site.
- (d) In the short to medium term, proposals will focus on land under a leasehold by Aviva Capital Partners to deliver a life science campus. However, this proposal must be integrated with the wider ambitions for the overall London Cancer Hub site, including emerging proposals by ESTH for the SECH.
- (e) To achieve the Council's objectives, the policy framework and site allocation will:
 - (i) Maximise the site as a life science campus by ensuring employment floorspace is directly tied to Use Class E(g), (i), (ii), and (iii) only.
 - (ii) Include specific design criteria to ensure buildings provide floorspace for laboratories (including uses for scientific and/or medical research and development purposes) and offices in connection with human healthcare.
 - (iii) Not allow open-market residential development on the site.
 - (iv) Use planning consents, requirements, and obligations to ensure that any 'accommodation' provided is ancillary to the function of the LCH site, and be inextricably linked to its operation. Any accommodation would only serve the staff, clinicians, patients, and visitors of patients, with occupancy restricted.
 - (v) Require tall buildings to be focused towards the centre of the overall LCH site.
 - (vi) Ensure there is a strategic transport assessment for the whole of the LCH site, with cooperation and coordination from all landowners / developers to reach consensus on the analysis of impacts and proposed mitigation measures for access, sustainable transport, and infrastructure improvements.
- (f) The Council expects to achieve significant sustainable transport improvements to and

from the site. Proposals shall understand the latest regarding the delivery of Tramlink, and consider potential complementary and/or alternative sustainable transport solutions.

- (g) The Council expects all development proposals on the LCH site to be prepared in collaboration with the local community, as well as all relevant stakeholders and businesses.
- (h) Proposals will have regard to emerging policies in the Belmont & South Cheam Neighbourhood Plan. Whilst the LCH site is outside of the designated area for the Neighbourhood Plan, development proposals should consider the implications for the area immediately surrounding the site. Specifically, the impacts on: local character, tall buildings, design, transport and accessibility, provision of shared services and facilities, and car parking.
- (i) In accordance with the analysis set out in the Council's Tall Buildings Study (2024), the Council will support tall buildings across the central part of the LCH site, as set out in Issue 39 on Tall Buildings . This is subject to the findings of technical assessments for each development site, and any development proposal being in accordance with the Council's policies on design, character and appearance, heritage, and environmental protection.
- (j) The LCH site will support the Council in delivering against its Climate Emergency objectives. It is expected that all landowners / developers (as part of their ESG commitments) will provide an assessment of potential environmental impacts, including: Environmental Impact Assessment, Construction and Environment Management Plan, Energy Statement, Waste Strategy, Water Strategy, Sustainability Statement, and Transport Assessment.

8.D Regulation 18 Consultation Questions



- A. Do you agree / disagree with the draft policy principles for the LCH?
- B. Do you agree / disagree that the LCH site should have an overarching plan for all of the site?
- C. Do you agree with the Council's approach to not allow residential development on the site, with accommodation restricted to ancillary and subject to restrictions and occupancy criteria?
- D. Should the Council set criteria to make sure that employment floorspace delivered at the LCH site is specifically for laboratory, research & development, and ancillary offices?
- E. Should the Council allow jobs and floorspace delivered on the LCH site to contribute towards meeting its identified needs within the borough?

Please give reasons and where possible suggest alternatives.

Issue 9 - Sutton Town Centre Area Strategy

9.A Introduction

- 9.1** Sutton Town Centre is the largest centre in Sutton and is identified by the London Plan (2021) as one of only 4 Metropolitan Town Centres in south London. As a Metropolitan Town Centre, Sutton accommodates significant retail, leisure and service floorspace. These centres generally have very good accessibility and significant employment, service and leisure functions. Many have important clusters of civic, public and historic buildings. The London Plan also identifies Sutton Town Centre as an opportunity area but, as noted in paragraph 2.6, the status of this is questionable as it was predicated on the delivery of Tramlink.
- 9.2** As such, Sutton Town Centre plays a vital role for the borough, accommodating homes, retail, offices, restaurants and cafes, leisure facilities, civic functions and facilities and important social infrastructure. It has the highest levels of public transport accessibility, is well served by road and rail, and has significant heritage value too, with the High Street conservation area being designated as the first heritage action zone in London.
- 9.3** The Adopted Local Plan (2018), supported by the Sutton Town Centre Masterplan (2016), directed 55% of the borough's housing growth to Sutton Town Centre for the period 2016 to 2031, equating to around 3,500 new homes. In addition, Sutton Town Centre planned to accommodate approximately 26,000 sq.m. of new retail floorspace, and 23,000 sq.m. of office floorspace. However, the needs of the town centre have changed and this is reflected in the new evidence produced in support of the Local Plan Review (see Issue 1 on Establishing Sutton's Growth Needs). In addition, the Council has been proactive in supporting the redevelopment of Sutton Town Centre, helping deliver new homes, cafes, and commercial spaces and will be leading on the redevelopment of the St Nicholas Shopping Centre, which is now in the Council's full ownership now the lease has been acquired. This section seeks to set out options for addressing these new challenges.

9.B Context for Sutton

Background

- 9.4** The Council adopted the Sutton Town Centre Masterplan in 2016, setting out its ambitions for the regeneration of Sutton Town Centre, including the delivery of a significant number of new homes and retail space. However, whilst parts of the Sutton Town Centre Masterplan remain relevant, since its approval in 2016 the ambitions and requirements identified in it have evolved and been superseded. Some of the drivers of change include:
- Additional retail floorspace is no longer required as a result of changes to consumer habits, the growth of online shopping and the ongoing effect of the pandemic.

- Changes to national permitted development rights that give unprecedented flexibility to change between town centre uses without planning permission.
- The future of the Tramlink extension in light of TfL's most recent position and funding challenges, and opportunities this presents for the gyratory.
- Preparation of a new tall building study to inform the Local Plan review.
- The award of over £11 million from the Government's Future High Street Fund (FHSF) to deliver a number of Council-led projects in Sutton Town Centre.
- The Council's purchase of the St Nicholas Shopping Centre and its commitment to transformational redevelopment.
- The designation of a new Sutton Town Centre Conservation Area and the development of a Management Plan to support it and its Heritage Action Zone status.

Challenges and Opportunities

9.5 Sutton Town Centre faces a number of new challenges over the course of the next 15 years, which, through the support of the Local Plan and the Council's ambitions, can result in a vibrant, attractive and enhanced town centre. Table 9.1 sets out the strengths, weaknesses, opportunities (SWOT analysis) and threats for the town centre.

Table 9.1: Sutton Town Centre SWOT Analysis

1. Strengths	2. Weaknesses
<ul style="list-style-type: none"> ● One of only four Metropolitan Town Centres in south London, with a decent retail offer including a number of major national chains that help to anchor the High Street. ● Significant Council land ownership that is supporting a committed town centre regeneration programme. ● Four town centre supermarkets (Morrisons, Lidl, Asda and Sainsbury's) as opposed to out-of-town. ● Pedestrianised High Street is a sociable and free space for people to gather. ● Designation as a Heritage Action Zone and Town Centre Conservation Area to use heritage as a catalyst for economic growth. ● Close proximity to green spaces at Manor Park and Sutton Green. ● Active Business Improvement District (Successful Sutton). ● Highest levels of Public Transport Accessibility Levels in the borough. ● Close proximity to the London Cancer Hub with potential for links between the two. ● Significant number of development sites that can accommodate a mix of uses and support the need for new housing. 	<ul style="list-style-type: none"> ● Declining retail environment that mirrors the national picture. ● Some key national retailers are missing such as John Lewis, B&M and Dunelm. ● Mile-long linear High Street with significant gradient change. ● The gyratory acts as a barrier to pedestrian movements and is generally a poor quality environment. ● Lack of east-west connections through the High Street and those that do exist are dominated by parking. ● Limited food and beverage offer and poor night time economy options. ● Lack of commercial leisure uses for different age groups. ● Disjointed and uncoordinated streetscape and public realm. ● Lack of green infrastructure. ● The rear of buildings, including servicing yards, face onto streets parallel to the High Street, creating an unattractive environment.

3. Opportunities	4. Threats
<ul style="list-style-type: none"> ● Generational placemaking regeneration through Council-led redevelopment of key sites in the town centre, including the St Nicholas Centre and the Civic Sites. ● Providing new homes including new affordable Council housing. ● Provide new retail facilities that meet modern requirements through the St Nicholas Centre redevelopment. ● Introduce additional commercial leisure uses. ● Improved food and beverage offer. ● A growing population in Sutton Town Centre will create demand in the town centre and a growing population across south west London will create demand from further afield. ● Opportunity to consolidate retail and address the long linear High Street by designating an appropriate primary shopping area (PSA). ● Proximity to the London Cancer Hub offers opportunities for linkages. ● Improved gyratory, with slower traffic, better and easier east-west movements and improved pedestrian environment. ● Use of heritage as a catalyst for economic growth. 	<ul style="list-style-type: none"> ● The cost of living crisis has significantly reduced people's disposable income. This has an impact on spending in town centres. ● Continued increase in online shopping could further undermine retail on the High Street. ● No current commitment to major public transport inventions, such as Sutton Link (Tramlink). ● Nearby centres (such as Wimbledon, Croydon and Kingston) are competitors to Sutton and any future proposals to improve these places and their infrastructure could impact Sutton ● Introduction of further permitted development rights that remove the requirement for planning permission could further undermine High Streets.

9.6 To ensure that the future redevelopments continue to be coordinated, complementary and meet the needs of current residents, future residents, employees and employers, retailers and the voluntary sector, the Council will, through the Local Plan Review, set out a overarching strategic policy approach for the town centre. This will work alongside the other emerging policies and potential site allocations in this document to deliver the Council's aspirations for Sutton Town Centre.

Sutton Town Centre Priorities

9.7 The Council's vision for Sutton Town Centre is to create a vibrant and sustainable town centre with great shopping, culture and food, modern flexible office space and a good quality mix of housing, including affordable homes. The Council is taking an active role in realising this vision and has an ambitious programme to revitalise Sutton Town Centre through place-making redevelopment, diversifying the uses on the linear high street and bringing long-term vacant buildings back into use. This will directly create a wider range of job opportunities and thriving businesses by creating new commercial spaces and an improved local offer for residents within the town centre. It will also benefit wider businesses by supporting footfall, and therefore increase spending power, in the town centre.

- 9.8** In support of the vision and ambitions for Sutton Town Centre, there are a number of important projects being implemented or proposed that the Council consider would be beneficial for Sutton and enhance the town centre.

Transformational redevelopment of the St Nicholas Centre

- 9.9** In August 2021, the Council completed the purchase of the St Nicholas Shopping Centre lease along with three adjacent High Street Properties. Since this time, the Council has been working on a regeneration strategy for the site, along with the linked sites of the Civic Centre, the Secombe Theatre and Gibson Road Car Park. The acquisition of the centre for regeneration purposes puts the Council in full control of a key strategic town centre asset, thereby protecting its wider interests linked to the future of the High Street and town centre more broadly.
- 9.10** In October 2022, the Council undertook public engagement on the future of the town centre and the initial ideas for St Nicholas Centre. The Council's vision for the site involves transformation redevelopment to create a brand new 'Civic Hub' on the High Street, which could include;
- A new Civic Hub to support hybrid working, with a "front door" to the High Street to improve residents' access to services.
 - A new town centre library.
 - New retail units that meet modern needs.
 - Other commercial spaces such as restaurants and leisure.
 - Space to host a range of public services provided by the Council and its partners.
 - New housing, including a significant proportion of affordable homes.
 - Create new east-west links between the High Street and St Nicholas Way.
 - A new public square along with other public realm improvements, including traffic calming on the gyratory.
 - The refurbishment of two more heritage buildings at 137-145 High Street (the former Topshop and Vision Express shops) into retail and business space.
- 9.11** The Council is currently seeking a development partner to take the project forward with a view to relocating to the new Civic Hub in around five years.

Redevelopment of the Civic Centre sites

- 9.12** The creation of new civic offices on the St Nicholas Centre site means that the current Civic Centre sites would be freed up for redevelopment. The development would include the Civic Centre, the Secombe Theatre, and the Gibson Road Car Park. All three sites are allocated in the Adopted Local Plan (2018), however the ambitions for the sites have evolved since this time:
- **The Civic Centre** - The existing allocation for the Civic Centre (STC9) envisaged that redevelopment would include the re-provision of civic offices on the site, alongside re-provision of the library and college, and new residential units and town centre uses. However, it is now the intention to relocate the civic offices and library to the High Street in a redeveloped St Nicholas Centre. Furthermore, Sutton College is also proposed to be moved to the High Street as part of the 'Northern Gateway enhancements' (see below). This frees up the existing Civic Centre site, which is disconnected from the High Street by the gyratory, for

residential-led redevelopment. This will need to consider how it responds to the important listed buildings that are located in the immediate vicinity of the site and how redevelopment can improve the gyratory and connection to the High Street.

- **The Secombe Theatre** - The Secombe Theatre (STC10) and the adjacent church building were safeguarded for a new primary school and, in the event that a school was not required, for residential purposes. The Council was not able to acquire the church building when it was put up for auction and the Secombe site is not large enough to accommodate a school on its own. A replacement theatre is no longer required as alternative provision has been found at Throwley Yard (see below as well as the requirement for a new flexible event space in the Council's Civic Hub). This frees the site up to contribute towards the Council's housing targets through the inclusion of high-quality homes, including affordable.
- **Gibson Road Car Park** - Gibson Road car park was allocated for residential-led redevelopment, including car parking, community and town centres uses, subject to a parking study to determine whether the car park could be released from this site. The majority of parking users of the Gibson Road are connected to the Council and its staff. The current data indicates the levels of occupancy for Gibson Road can be absorbed into both Times Square and the St Nicholas Centre and would still have spare capacity to address any likely increased parking requirements. It is likely that the site will be again allocated for residential led-redevelopment.

9.13 The Council wishes to see civic functions moved directly from these sites onto the High Street, so the increased footfall from Council employees and visitors will support increased demand in renewed retail, leisure and food and beverage offerings. This will enable the creation of a new campus of buildings designed to respond to demands that suit post-pandemic behaviours and assist in supporting town centre living. This allows the release of these sites on the periphery of the town centre to residential-led schemes. These sites can make a positive contribution towards Sutton's housing obligations, including the delivery of new affordable homes, and potentially accommodate other ancillary commercial or social uses.

Enhancing the Northern Gateway

9.14 As part of the Future High Street Fund (FHSF), a Government grant to support high streets across the country, the Council acquired the ownership of the historic 246-254 High Street, known locally as the "White Building". This former fire station, located at the northern end of the High Street, has been vacant for over a decade, has become dilapidated and creates both a poor image of the town centre and negatively impacts on the northern end of the High Street.

9.15 The Council wants to bring this important building back into active use and is proposing to move Sutton College from the current Civic Centre site into the refurbished building to create a high quality educational space. The highly visible presence of the College in Northern Gateway will make a significant contribution to revitalising this part of the town centre. Any development of the site needs to pay regard to the Sutton Town Centre Conservation Area.

Delivering Council-led affordable housing

- 9.16** In addition to the delivery of new homes, including affordable units, on the St Nicholas Centre, Civic Centres Sites and the Northern Gateway, the Council is also committed to estate regeneration on sites in the town centre.
- 9.17** Beech Tree Place was a 1950s housing scheme for older people over the age of 55. Allocated in the Adopted Local Plan, it is currently being redeveloped. Supported by a residents charter, planning permission was granted to provide 92 affordable housing units, new landscaping and public realm improvements to St Nicholas Way. The site is now under construction and will contribute to the wider regeneration of Sutton Town Centre.
- 9.18** The Council is progressing the redevelopment of the Elm Grove Estate, an existing allocation in the Adopted Local Plan, following the residents voting overwhelmingly in favour of full redevelopment. The Council agreed at committee in January 2023 to pursue the full redevelopment option and to progress to pre-planning.
- 9.19** Located to the rear of the High Street and forming a boundary with Throwley Way, Elm Grove currently accommodates 73 homes. The site has the potential to deliver over 200 new homes and would contribute towards the overall regeneration of the Northern Gateway through:
- New high quality and accessible homes, which meet modern space standards.
 - The refurbishment and rear extension of 216-220 High Street, to provide improved flexible mixed use floorspace on the existing ground floor, alongside additional new homes in the building.
 - A mix of one, two and three bedroom accommodation.
 - Up to 50% affordable housing provision.
 - Energy-efficient development, using a fabric first approach and incorporating renewable measures to contribute to a reduction in carbon emissions.
 - Private external amenity space, communal external amenity space and on-site child's play space.
 - New landscaping and improved public realm, including new east-west pedestrian links.
- 9.20** The Council will also explore opportunities for further regeneration around Sutton Town Centre on those sites identified on the Policies Map as 'Potential Renewal Areas', subject to viability and residents' support.

Creating a new landscape-led residential neighbourhood near Sutton Station

- 9.21** The site currently occupied by B&Q, located in the southern part of the town centre near the station, is coming forward for redevelopment. The Adopted Local Plan allocated the site for mixed-use redevelopment, including over 13,000 sq.m. of retail space and nearly 500 new homes. However, the Council's new Town Centre and Retail Need Study (2023) shows that the retail landscape has changed significantly and the need to provide a greater quantity of retail floorspace has diminished to the point where Sutton now has an oversupply. As such, the vision for the B&Q site has evolved.

9.22 It is now envisaged that the site will create a landscaped-led residential redevelopment of the site to provide nearly 1,000 new homes, including 35% affordable housing, set amongst new green spaces and trees that are linked to the adjacent Manor Park. In total, around 60% of this brownfield site will be given over to green space, providing a new public green, and over 13,000 sq.m. of green space in total, significant biodiversity net gain, over 350 new trees and additional private amenity space. The site ultimately has the opportunity to create a new 'green' neighbourhood in the heart of a metropolitan centre.

The future of Sutton Link (Tramlink)

9.23 The London Plan identifies Sutton Town Centre as part of the 'Trams Triangle' Opportunity Area, with potential to deliver 5,000 new homes and 3,500 jobs in Sutton, and as a major project under London Plan Policy T1 and T3 (Table 10.1). However, as identified in Local Plan Review Policy 7, the short to medium term future for the Sutton Link tram scheme is now uncertain.

9.24 The safeguarded alignment for Sutton Link in the Adopted Local Plan utilises the town centre gyratory with a significant terminus close to the railway station. The Local Plan Review will need to decide, in light of the current status of the scheme, whether the route should continue to be safeguarded to allow for the funding position to change in the long term. Given that the route is largely along public roads, it should be possible to continue the safeguarding without having an impact on other town centre proposals. This is discussed in more detail in Issue 7 (Sustainable Transport Infrastructure).

Transforming the gyratory

9.25 The Sutton gyratory, which wraps around the town centre, has come to be defined by the movement of general traffic, creating a hostile environment for anyone else wishing to cross it or move around it. It has been consistently identified as having a number of negative impacts on the town centre, most significantly acting as a barrier to those trying to access it on foot, by bicycle and public transport from the neighbourhoods that it should serve.

9.26 Currently, the gyratory is one of the greatest threats to Sutton maximising the potential benefits of these wider trends. At the same time Sutton Town Centre has significant regeneration potential, with a number of key sites around the gyratory likely to come forward in the short to medium term, a number of which are discussed above. How these sites address the Sutton gyratory will be fundamental to its ability to adapt to future aspirations. Conversely, if the gyratory does not change then it will be highly probable that development will reinforce the existing fortified, defensive architecture that lacks active frontages, fails to animate the gyratory and makes east-west movements difficult for pedestrians.

9.27 Over the next 15 years there will be opportunities to improve the gyratory and its environment. Firstly, there are a significant number of development sites around the gyratory, including a number that are Council-owned, presenting an opportunity to proactively improve the gyratory in the vicinity of those sites as part of redevelopment proposals. This is already taking place on sites that are under

construction, most notably Beech Tree Place on St Nicholas Way. Opportunities to improve the gyratory include:

- Retention of the one-way system but introduce measures to slow down traffic to make east-west movements easier and generally improve the environment.
- Introduce more space for pedestrians and cyclists, including wider pavements when redevelopment proposals come forward e.g. the redevelopment of the St Nicholas Centre could introduce wider pavement widths on St Nicholas Way.
- Introducing active frontages on St Nicholas Way and Throwley Way.
- Introducing greater landscaping, including trees which maximises opportunities for sustainable drainage and biodiversity.
- Developing a Delivery and Servicing Strategy for business on the High Street.
- Introducing new east-west links when development opportunities allow and improve existing routes.
- Introducing new crossing points that align with key east-west links alongside improvements to existing crossings.
- Allowing the use of the safeguarded tram route for enhanced walking and cycling routes, ensuring that any measures do not prejudice the Sutton Link scheme coming forward in the future.

Supporting modern, flexible office space

9.28 Whilst the Local Plan Review supports new housing delivery, it is important that the Town Centre does not become a dormitory town. Therefore the Local Plan must continue to support a mix of commercial uses in the town centre, including modern and flexible office space, which will also provide job opportunities and help address identified need for office floorspace in Sutton.

9.29 The Council is already proactively supporting modern office floorspace through the delivery of the Oru Sutton space in part of the old BHS building. This former vacant retail space has been converted to create a coworking, hospitality and wellbeing space that opened in 2023. In the future, the Oru Sutton site will provide additional features and benefits: roof-top hospitality to stimulate Sutton's evening economy; and retail incubator space to kick-start local small and medium enterprises.

9.30 The Local Plan Review will continue to seek ways of addressing employment needs in the town centre through innovative and modern solutions. These types of spaces could be delivered on a range of sites across the town centre and could form part of site allocation requirements. Further flexible spaces can help address office need requirements as an alternative to out-dated speculative offices development, which the Employment Land and Economic Needs Assessment concluded there was no market demand.

Creating new leisure space

9.31 In order to ensure Sutton has a diverse and resilient town centre, the High Street needs a good mix of uses that can support increased footfall and create a destination that people will spend more time in. One way in which town centres are diversified is to support additional commercial leisure and food and beverage operators. As part of the FHSF, the Council is already supporting new spaces within the town centre by utilising vacant buildings. For example, the former Chicago

Nightclub is being converted to provide an independent cinema and cultural hub. This will improve the day and night time offer for residents and visitors through creating a new destination within the town centre.

- 9.32** The Local Plan Review should seek to support opportunities for further commercial leisure uses within the town centre. For example, the redevelopment of the St Nicholas Centre offers the opportunity to introduce a diverse range of uses, which could include leisure activities and new restaurant space.

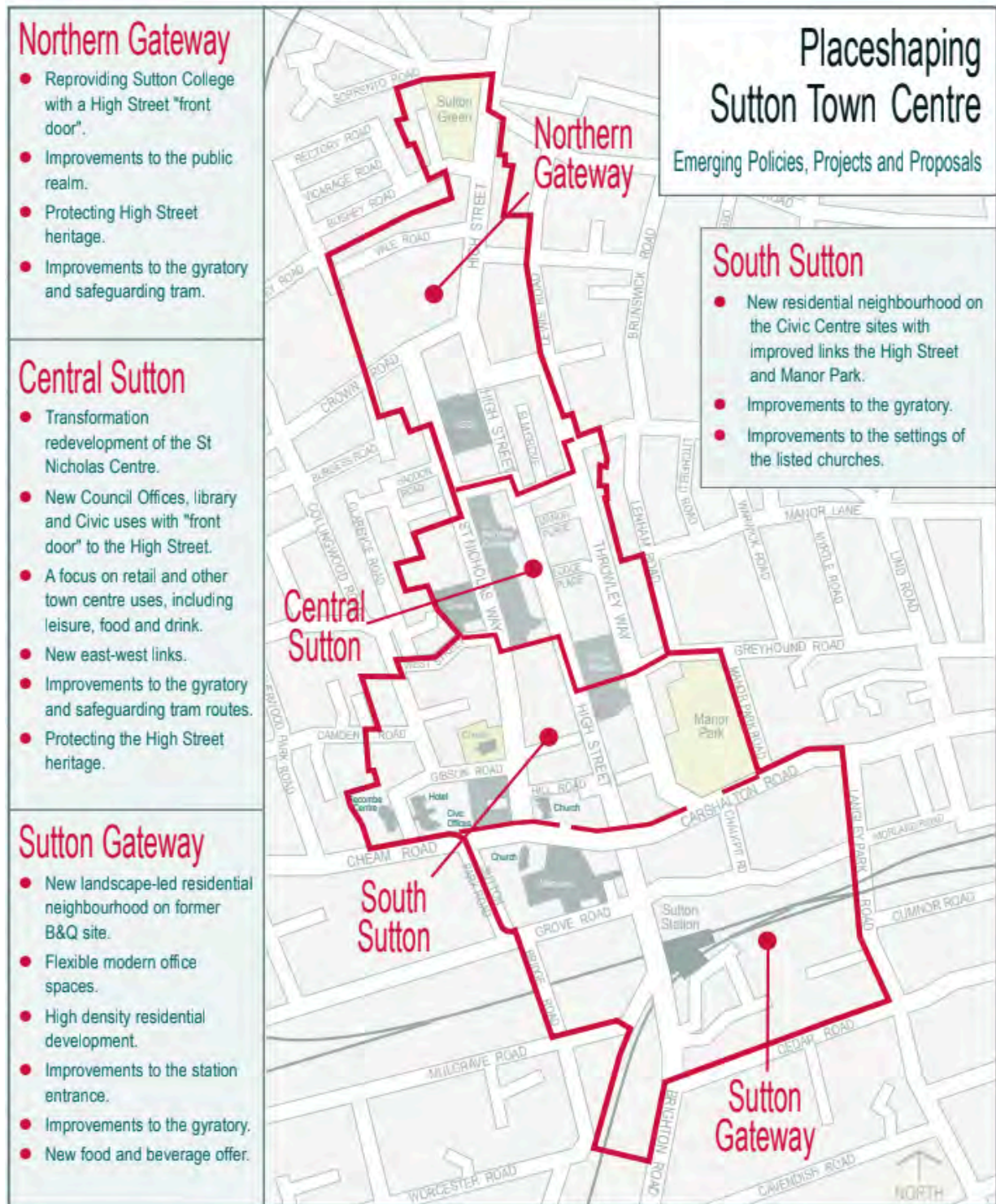
Tall buildings

- 9.33** Sutton Town Centre is home to a number of existing and planned tall buildings. Under the Adopted Local Plan, the tallest buildings in the borough are directed here, particularly around Sutton Station, but existing policy recognises the importance of protecting the “human scale” and heritage value of the High Street. In support of the Local Plan Review, the Council has commissioned a borough-wide Tall Building Study to assess the most appropriate locations for tall buildings and offer guidance on appropriate heights.
- 9.34** Given its status as a Metropolitan Centre, the town centre has been identified in the study as an appropriate location for tall buildings, with the tallest elements most appropriate around the Station. This offers the opportunity to accommodate higher density development in a town centre location that has the best access to transport and services and will form part of the town centre strategy. Further detail on tall buildings is set out in Issue 39.

Enhancing the heritage value of Sutton Town Centre

- 9.35** In 2017, Sutton Town Centre was designated as London’s first Heritage Action Zone by Historic England with the aim of promoting economic growth through local heritage. One of the key outputs of this project was the extension of the Sutton High Street Crossroads Conservation Area, a small area focussed around the listed Cock Inn sign, to form a new, larger, Sutton Town Centre Conservation Area. The new conservation area now includes the regularity of the urban blocks and shopfronts and, in particular, all the notable shopping parades and terraces that retain considerable historic interest from the Victorian period. In addition, the current boundary now includes all three listed churches and recognises the historic background to the emergence of Sutton as a Metropolitan Centre.
- 9.36** In support of the new conservation area, the Council has adopted a Sutton Town Centre Conservation Area Management Plan (2019) to ensure that any development, regardless of size or scale, conserves, and where practicable, enhances those elements which contribute to their significance, including their setting. This is supported further by the provisions of the Sutton Town Centre Public Realm Design Guide Supplementary Planning Document (SPD) 2020.
- 9.37** As such, the Council will expect that any development proposals that come forward in Sutton should recognise its heritage value and apply the guidelines set out in the Management Plan and Public Realm Design Guide SPD.

Map 9.1: Sutton Town Centre Placeshaping



Towards a Policy Approach

9.38 Based upon the evidence and analysis, the Council has established a series of policy principles for consideration as part of this Regulation 18 consultation. These are:

9.C Draft Policy Principles 9 for Sutton Town Centre

- (a) The Council will work with residents, community groups, business, landowners, developers and relevant bodies to deliver a comprehensive approach to development in Sutton Town Centre to accommodate a significant level of growth.

New Housing

- (b) The Council will enable the delivery of new homes across Sutton Town Centre and its Area of Potential Intensification and will expect a range of tenures and dwellings sizes, including family sized homes (see Chapter 4 for the full list of potential Site Allocations) The Council will support the redevelopment of the former B&Q site for a landscaped-led residential redevelopment to create a new neighbourhood in the southern Town Centre. This scheme should introduce significant amounts of new green space, residential dwellings that include affordable units and family sized dwellings and high quality design. The Council will enable the delivery of new affordable and Council housing across its sites, including the St Nicholas Centre, the Civic Sites, Elm Grove, and Beech Tree Place. The Council will also investigate the feasibility and viability of redeveloping the Potential Renewal Areas around Sutton Town Centre, as identified on the adopted Policies Map.

Retail and Town Centre Uses

- (c) The Council will enable the transformation of the St Nicholas Shopping Centre to deliver a mixed use scheme, that will include new Civic offices, a new library, a range of town centre uses, new housing including affordable homes, an enhanced public realm including civic spaces and new east-west connections that help to link the High Street with the surrounding area. This will include better retail units that meet modern needs.
- (d) The Council will support the delivery of retail spaces and other town centre uses, across sites in Sutton Town Centre.

Modern Office Spaces

- (e) The Council will support new office space in Sutton where there is market demand. In particular the Council will support flexible office spaces that are more likely to meet modern needs than traditional office models, which currently do not have market interest in Sutton.

Leisure and Food and Beverage Spaces

- (f) The Council will support new leisure and food and beverage spaces in Sutton Town Centre to meet the identified need. The Council will proactively support this aim through the delivery of new leisure space as part of the St Nicholas Centre proposals and through the delivery of 'Throwley Yard', which will provide an independent cinema, cultural hub and space for food and beverage.

Community Uses

- (g) The Council will support the relocation of the library to the redeveloped St Nicholas Centre site and the relocation of Sutton College to 246 to 254 High Street. In addition, the Council will help the NHS and other health stakeholders to ensure the health needs of the town centre are met.

Transport and Sutton Link

- (h) The Council will also continue to work with Transport for London, to improve public transport choice and frequency in Sutton Town Centre. Redevelopment opportunities and public realm improvements schemes should take every opportunity to improve the environment and connections for pedestrians and cyclists. The Council will continue to safeguard the Sutton Link tram alignment from Rosehill to Sutton Town Centre. This safeguarded route could be used for enhancements to walking and cycling routes in the interim.

Transforming the Gyratory

- (h) The Council will support proposals that will soften the effects of the gyratory, including slowing down traffic, new and improved crossings, and improved public realm. In particular, the Council will encourage the creation of active frontages along St Nicholas Way and Throwley Way, the introduction of soft landscaping and measures to create a pedestrian friendly environment along the gyratory and to reduce the barrier effect of the gyratory for pedestrians intending to visit the High Street. The redevelopment of Council sites at the St Nicholas Centre, Civic Centre, Beech Tree Place and Elm Grove will facilitate improvements to significant parts of the gyratory. Proposals that involve enhancement to the gyratory should have regard to the Sutton Town Centre Public Realm Design Guide SPD.

Tall Buildings

- (k) Tall buildings will be supported in principle when they are located in an 'Area of Taller Buildings Potential'. The Council will expect that proposals for tall buildings must be of the highest quality and justify their presence in the townscape through careful consideration of the existing positive features of the area. In particular regard must be had to the presence of heritage assets in the vicinity of tall buildings.

Heritage

- (l) The Council will expect development in Sutton Town Centre to conserve, and where practicable, enhance the Sutton Town Centre Conservation Area including its heritage significance and setting. Development proposals should have regard to the Sutton Town Centre Conservation Area Character and Management Plan and the Sutton Town Centre Public Realm Design Guide SPD.

Infrastructure

- (m) The Council will support new infrastructure in and around Sutton Town Centre to support growth ambitions, including transport, health, education and green and blue infrastructure. The Council will expect new development, where practicable, to be future-proof to enable connection to any future district heat network.

Figure 9.3 below demonstrates how these projects support and link into general policy areas and development needs.

Figure 9.3: Sutton Town Centre Policy Themes and linkages to Projects and Sites

Policy Themes	Major Sutton Town Centre Projects	Potential Sites
<p>New Housing</p> <p>Including new mainstream housing, affordable housing, Council housing and estate regeneration.</p>	<ul style="list-style-type: none"> • Transformational Redevelopment of the St Nicholas Centre. • Redevelopment of the Civic Centre Sites. • Enhancing the Northern Gateway. • Delivering Council-led affordable housing. • Creating a new Landscape-led Residential Neighbourhood near the Station. • High quality tall buildings. 	<ul style="list-style-type: none"> • St Nicholas Centre • Civic Centre • Secombe Theatre • Gibson Road Car Park • Elm Grove • Beech Tree Place • Former B&Q Site • Other Town Centre Site <p>Allocations and future windfall sites</p>
<p>Retail and Town Centre Uses</p>	<ul style="list-style-type: none"> • Transformational Redevelopment of the St Nicholas Centre. • Creating a new Landscape-led Residential Neighbourhood near the Station. 	<ul style="list-style-type: none"> • St Nicholas Centre • Other Town Centre Site <p>Allocations and future windfall sites</p>
<p>Modern Office Space</p> <p>New, modern and flexible office space.</p>	<ul style="list-style-type: none"> • Supporting modern, flexible office space. • Transformational Redevelopment of the St Nicholas Centre. • High quality tall buildings. 	<ul style="list-style-type: none"> • St Nicholas Centre • Civic Centre • Secombe Theatre • Gibson Road Car Park • Other Town Centre Site <p>Allocations and future windfall sites</p>
<p>Leisure and Food and Beverage</p> <p>Which could include commercial leisure, restaurants/cafes, bars, pubs and night time economy uses.</p>	<ul style="list-style-type: none"> • Transformational Redevelopment of the St Nicholas Centre. • Creating new Leisure space. • Creating a new Landscape-led Residential Neighbourhood near the Station. • High quality tall buildings. 	<ul style="list-style-type: none"> • St Nicholas Centre • Throwley Yard • Former B&Q Site • Other Town Centre Site <p>Allocations and future windfall sites</p>
<p>Community Uses</p>	<ul style="list-style-type: none"> • Transformational Redevelopment of the St Nicholas Centre. • Enhancing the Northern Gateway. • Creating new Leisure space. • Enhancing the heritage value of Sutton Town Centre. • High quality tall buildings. 	<ul style="list-style-type: none"> • St Nicholas Centre • 246 to 254 High Street • Throwley Yard • Former B&Q Site • Other Town Centre Site <p>Allocations and future windfall sites</p>
<p>Transport and Sutton Link</p>	<ul style="list-style-type: none"> • Transforming the Gyratory • Transformational Redevelopment of the St Nicholas Centre. • Redevelopment of the Civic Centre Sites. • Delivering Council-led affordable housing. 	<ul style="list-style-type: none"> • St Nicholas Centre • Civic Centre • Elm Grove • Beech Tree Place • Other Town Centre Site <p>Allocations and future windfall sites located along the Sutton Link route.</p>
<p>Transforming the Gyratory</p>	<ul style="list-style-type: none"> • Transforming the Gyratory. • The future of Sutton Link 	<ul style="list-style-type: none"> • All sites are expected to contribute to public realm

	<ul style="list-style-type: none"> • Transformational Redevelopment of the St Nicholas Centre. • Redevelopment of the Civic Centre Sites. • Delivering Council-led affordable housing. • Creating a new Landscape-led Residential Neighbourhood near the Station. • High quality tall buildings. 	improvements and, where relevant, the gyratory.
Tall Buildings	<ul style="list-style-type: none"> • High quality tall buildings. 	<ul style="list-style-type: none"> • St Nicholas Centre • Civic Centre • Secombe Theatre • Gibson Road Car Park • Elm Grove • Beech Tree Place • Former B&Q Site • Other Town Centre Site <p>Allocations and windfall sites</p>
Heritage	<ul style="list-style-type: none"> • Enhancing the heritage value of Sutton Town Centre • Enhancing the Northern Gateway • Transformational Redevelopment of the St Nicholas Centre. 	<ul style="list-style-type: none"> • All development sites located in or adjacent to the conservation area will need to consider its impact and opportunities for enhancement.
Infrastructure	The collective impact of all projects and potential redevelopment sites will need to be considered and planned for, to ensure there is sufficient infrastructure in place to accommodate the ambitions for Sutton Town Centre.	

9.D Regulation 18 Consultation Questions



- A. Do you support the overall principles that will be used to inform the Sutton Town Centre Policy?
- B. Do you support the comprehensive redevelopment of the St Nicholas Centre to accommodate new housing and a range of town centre related uses? Which uses would you like to see?
- C. Do you support new office space in Sutton Town Centre?
- D. Do you support additional leisure facilities in the town centre? What type of leisure uses does the town centre need?
- E. What types of food and beverage provision is missing and what would you like to see?
- F. Do you support the proposals to improve the gyratory and east-west connections across the town centre?
- G. Do you support tall buildings in appropriate locations in the Town Centre?
- H. Do you support the approach to heritage assets in the Town Centre?
- I. Do you have any further views of Sutton Town Centre proposals and principles? Is anything missing and are there any alternative options?

Where possible, please give reasons in response to the above questions.

Issue 10 - District Centres Strategy

10.A Introduction

- 10.1** The NPPF (2023) requires that a local plan should define a network and hierarchy of town centres and promote their long term vitality and viability by allowing them to grow and diversify by accommodating a range of town centre uses including retail, leisure, office and residential uses. The London Plan (2021) Policy SD8E notes that district centres should focus on the consolidation of a viable range of functions, particularly convenience retailing, leisure, social infrastructure, local employment and workspace, and consider opportunities for higher density mixed-use residential development and improvements to their environment.
- 10.2** The role of the district centres in accommodating growth needs as part of an overall Spatial Strategy for the borough is considered under Issue 2. This chapter considers the issues regarding vitality, viability and resilience of the district centres, considering potential opportunities for accommodating development needs and environmental improvements.

10.B Context for Sutton

- 10.3** The borough's town centre network comprises: Sutton Town Centre (classified as a Metropolitan Centre), seven District Centres and 29 Local Centres. The District Centres are intended to provide goods and services for their local communities, and are spread across the borough. These comprise Carshalton, Cheam, Hackbridge, North Cheam, Rosehill, Wallington and Worcester Park.
- 10.4** The Adopted Local Plan directs 35% of the borough's housing growth to the District Centres and their surrounding Areas of Potential Intensification (within 400m of the centre) for the period 2016 to 2031. This equates to around 2,370 new homes with most planned in Hackbridge (1,100 new homes) and Wallington (635 new homes). In addition, the Adopted Local Plan aims to accommodate approximately 17,200 sq.m. of new retail floorspace in the District Centres. Most of the housing has been delivered, particularly due to development at key sites in Hackbridge and Wallington. There has been limited change in retail floorspace.
- 10.5** The Council undertook a District Centres Health Check (2022) and commissioned a Town Centres and Retail Need Assessment 2023 (TCRNA). These concluded that the District Centres are correctly classified in the town centre hierarchy given their roles in providing sustainable access to convenience goods and services, and the focus they provide for their local communities. The TCRNA also set out the forecast retail need in each of the District Centres showing a small need for additional convenience retail which is somewhat balanced by a decline in the need for comparison retail.

10.6 Both the District Centres Health Check and TCRNA identified issues and opportunities for improvement for each centre. The TCRNA also highlighted some overriding issues facing all high streets, including:

- The changing need for retail floorspace as a result of changes to consumer habits, the growth of online shopping and the ongoing effect of the pandemic.
- Changes to national permitted development rights that give unprecedented flexibility to change between town centre uses without planning permission.

10.7 The Council has also prepared a draft borough-wide 'Character Study' (2024) to inform the options for growth set out in the Local Plan Review. The study assesses the characteristics of different places in the borough and recommends whether to conserve, enhance or transform those areas. This has helped inform the potential options for growth in and around the District Centres.

Opportunities and Challenges

10.8 The District Centres face a number of challenges over the next 15 years. As well as setting out the overall spatial strategy for addressing growth needs, the Local Plan Review will also set out the opportunities which can support centres which continue to play their part in the town centre network for the borough. Table 10.1 sets out the issues and opportunities for change for each of the District Centres.

10.9 Some centres will be affected by heritage and infrastructure considerations. Carshalton and Cheam District Centres are both located within Conservation Areas, and regard has been given to the Carshalton Village Conservation Area Character Appraisal and Management Plan (2019) and Cheam Village Conservation Area Character Appraisal and Management Plan (2021). The future of some transport infrastructure projects, namely Sutton Link and Crossrail 2 may affect proposals for Rosehill and Worcester Park. The Council has some existing transport and flood alleviation proposals which will affect the District Centres.

10.10 The Council is considering the options to meeting growth needs not only for housing, but also for office and other employment land needs. The Council commissioned an Employment Land and Economic Needs Assessment (ELENA) which has identified a need for office and industrial floorspace. These are addressed in Issue 26 Office Development and Issue 24 Employment Land. The options for accommodating these needs may include sites within the District Centres.

10.11 In addition, the Council has commissioned a Tall Building Study to assess the most appropriate locations for tall buildings and offer guidance on appropriate heights, the outcome of which will influence the potential for growth in the District Centres. This study is discussed at Issue 39 Tall Buildings, and notes that whilst Sutton Town Centre is the most appropriate location for tall buildings, there may be potential for taller buildings in some of the District Centres.

Table 10.1: District Centre SWOT Analysis

1. Carshalton District Centre SWOT Analysis	
1. Strengths	2. Weaknesses
<ul style="list-style-type: none"> • A good mix of retail units, including independent retailers. The presence of two large supermarket chains in Sainsburys and Co-op, as well as some national multiple chain retailers. • The centre is well served by car parking. • Rail station is step free and with a good train frequency (8 trains per hour) • Well served by a range of buses including the SL7 Superloop service • The centre is located within a conservation area and contains a number of buildings of heritage value. The historic townscape and human scale of buildings contribute to its character. • A selection of community facilities in the locality, including a theatre/arts centre, green open spaces, a leisure centre and library nearby. • The centre is within walking distance of large areas of residential housing. 	<ul style="list-style-type: none"> • The High Street is a narrow TfL route dominated by traffic, resulting in vehicle noise, emissions and poor pedestrian environment, as well as congestion near Carshalton Ponds and bus delays. • Beacon Grove shopping arcade and adjacent pharmacy on the northern side of the high street are considered to be of poor design quality and have a negative impact on the character of the conservation area. • Some shop fronts are over dominant, with external shutters and a loss of vertical emphasis. • Some long standing vacancies. • Quality of redevelopment of Forge site that was subject to enforcement action. • Poor cycling infrastructure.
3. Opportunities	4. Threats
<ul style="list-style-type: none"> • Opportunity to support high quality redevelopment of Beacon Grove shopping arcade and the pharmacy to the west if it enhances the character of the conservation area. • Opportunity to bring the former Fox and Hounds public house building/site back into use. • TfL have had a long standing proposal to divert HGVs from Carshalton High Street in a westbound direction, however this is not currently funded. • Improve links to green spaces (e.g. Grove Park) and to soften the visual impact of the car park. • Improvements to shopfronts where this restores/reflects historic features and proportions. 	<ul style="list-style-type: none"> • Continued vacancy of the former Fox and Hounds public house which is a prominent site in the centre. • It is one of the smaller District Centres, and its significance may be impacted by changes in shopping habits and by implementation of permitted development rights which could undermine the functioning of the centre. • Limited development sites to deliver new housing.
2. Cheam District Centre SWOT Analysis	
1. Strengths	2. Weaknesses
<ul style="list-style-type: none"> • The presence of Sainsburys and Little Waitrose as well as other national chain retailers. • A number of independent retailers. • The relatively large number of cafes, restaurants, pubs and bars contribute to the evening economy • A high proportion of attractive buildings, many of heritage value which make for a generally pleasant townscape within a Conservation Area. • Well served by bus routes and a railway station just beyond the District Centre, offering 8 trains per hour. • Well served by car parking, with two public car parks. • Civic and community facilities, including Whitehall historic house and a library. Close to Cheam Park. 	<ul style="list-style-type: none"> • Traffic dominance particularly at the crossroads and along the A2043 (Malden Road), which adversely affects air quality and causes severance/general disruption and inconvenience to pedestrians. • Although many of the buildings are of good architectural merit, there are some poor quality developments which have a negative impact on the character of the conservation area, such as the Cheam library, • In some parts of the centre shopfronts are of mixed quality, and can detract from the quality of the buildings above ground floor.

<p>3. Opportunities</p> <ul style="list-style-type: none"> • Opportunities for redevelopment / intensification of appropriate sites to deliver new housing and additional community or commercial space, including Cheam library. • Improvements to the road intersection of A232 /A2043 to lessen its dominance on the townscape. • Improvements to the pedestrian experience / additional infrastructure for walking and cycling. 	<p>4. Threats</p> <ul style="list-style-type: none"> • Introduction of further permitted development rights that remove the requirement for planning permission could further undermine High Streets.
<p>3. Hackbridge District Centre SWOT Analysis</p>	
<p>1. Strengths</p> <ul style="list-style-type: none"> • Lidl store which serves as an anchor retailer. • Community facilities including a GP surgery. • Well served by bus and rail. • Significant investment in comprehensive redevelopment and the public realm. • Close to green spaces with planned greater public access at Beddington Farmlands. • An adopted neighbourhood plan which supports local character and good design. 	<p>2. Weaknesses</p> <ul style="list-style-type: none"> • London Road is a strategic road route, which is traffic dominated and impacts negatively on character, pedestrian movements and air quality. • Centre is small. • Limited retail offer. • Stretches of less active frontages.
<p>3. Opportunities</p> <ul style="list-style-type: none"> • There are redevelopment opportunities within the centre at sites adjacent to and north of the rail station to deliver new mixed use development which could strengthen the role and function of the district centre role by increasing the amount and range of commercial and community services. • Further environmental improvements to enhance links to greenspace and improve access and approach to the station. 	<p>4. Threats</p> <ul style="list-style-type: none"> • Height of new development and relationship with existing development needs careful consideration to ensure it does not affect townscape character. • It is one of the smaller District Centres, and its significance may be impacted by changes in shopping habits and by implementation of permitted development rights which could undermine the functioning of the centre.
<p>4. North Cheam District Centre SWOT Analysis</p>	
<p>1. Strengths</p> <ul style="list-style-type: none"> • Presence of a major supermarket in Sainsbury's. • The centre is well served by buses and has good levels of supermarket car parking. • Wide pavements, with sections of public realm softened with planting. • Lavender Corner is a fine example of commercial Art Deco development and is a prominent feature of the townscape. It is a Locally Listed Building (LL45). 	<p>2. Weaknesses</p> <ul style="list-style-type: none"> • Vacant site at prominent crossroads location (former Victoria House site) detracts from the attractiveness of the centre. • Traffic dominance at the crossroads and along the A24 (London Road) affects air quality and causes severance. • Poor linkages between Sainsbury's store and the rest of the centre. • Gaps in frontages, particularly in the eastern section of the centre, for example that created by forecourt parking to the drive through restaurant.

<p>3. Opportunities</p> <ul style="list-style-type: none"> • There are opportunities for redevelopment / intensification of appropriate sites to deliver new homes and town centre uses. The Victoria House site offers potential for a landmark building which could revitalise this part of the centre. Planning permission for a mixed use development (part 4 storey/part 7 storey) was granted in 2023 (DM2021/02555) • There is potential to improve the linkages to Sainsbury's store. • Wide pavements allow for potential further improvements to the public realm to soften the pedestrian environment from the impact of traffic. 	<p>4. Threats</p> <ul style="list-style-type: none"> • Continued vacancy of Victoria House site at prominent location within the centre. • Introduction of further permitted development rights that remove the requirement for planning permission could further undermine High Streets.
<p>5. Rosehill District Centre SWOT Analysis</p>	
<p>1. Strengths</p> <ul style="list-style-type: none"> • The centre is anchored by a medium sized supermarket in Lidl, which has associated car parking. • The centre is well served by buses. • The centre has some attractive 1930s art-deco buildings which contribute to townscape and local identity. 	<p>2. Weaknesses</p> <ul style="list-style-type: none"> • Roundabout acts as a barrier to pedestrian movements / dominates the built environment. • Traffic dominance has a major impact affecting air quality and noise levels. • The poor quality shopfronts and upkeep on upper floors detract from the centre. • Poor interaction of supermarket with rest of centre due to blank frontage of the supermarket to Wrythe Lane and poor access to car park. • Rail access limited in terms of distance, accessibility and frequency • The centre has a higher level of vacancies than other District Centres.
<p>3. Opportunities</p> <ul style="list-style-type: none"> • Opportunities for intensification at appropriate sites. Should protect the interwar character which is consistent with the rest of the St Helier Estate Area of Special Local Character. • The supermarket site by the roundabout has potential to be a prominent gateway site, with residential on upper floors and retention of the supermarket. However, the store has recently been refurbished so redevelopment may be unlikely within the next 10-15 years. • Improvements to shopfronts, upper floors and the public realm would be beneficial to the character of the area. • Opportunities to improve the road environment without impacting on traffic flow could be explored. • Includes a safeguarded route for the proposed Sutton Link from Wimbledon to Sutton Town Centre. 	<p>4. Threats</p> <ul style="list-style-type: none"> • Plans for improving public transport options through the Sutton Link scheme have paused because of TfL funding issues. • Introduction of further permitted development rights that remove the requirement for planning permission could further undermine High Streets.
<p>6. Wallington District Centre SWOT Analysis</p>	
<p>1. Strengths</p> <ul style="list-style-type: none"> • Presence of two national supermarket chains, in Sainsbury's and Lidl, with associated car parking. • A mix of national retailers and independent stores, and a regular farmers market. • Civic and community facilities, including library and health centre. 	<p>2. Weaknesses</p> <ul style="list-style-type: none"> • Sainsbury's supermarket has a poor frontage on Woodcote Road, separated by its car park and servicing access. • Traffic dominance along both Woodcote Rd / Stafford Rd detracts from environmental quality.

<ul style="list-style-type: none"> Well served by bus and rail services. The centre has some historic buildings, and attractive frontages in parts. Wide pavements with some soft landscaping (in part). 	<ul style="list-style-type: none"> Poor pedestrian accessibility near the station due to change in pavement and road levels. Poor sense of arrival at gateway points to the centre, particularly from the Railway Station. Some longer term vacancies. Some gaps in active frontages along Stafford Road.
<h3>3. Opportunities</h3>	<h3>4. Threats</h3>
<ul style="list-style-type: none"> Opportunities for intensification, including taller buildings in appropriate locations, particularly around Wallington Railway Station. Improvements to the prominent corner site at Ross Parade. Delivery of new housing across Wallington District Centre including redevelopment/intensification at large supermarket sites. Opportunity at periphery of centre for sensitive intensification. Improvements to the pedestrian experience, through further improvements to the public realm and reduce traffic dominance. 	<ul style="list-style-type: none"> Introduction of further permitted development rights that remove the requirement for planning permission could further undermine High Streets. Loss of offices near the station could undermine the vitality of the centre.
<h2>7: Worcester Park District Centre SWOT Analysis</h2>	
<h3>1. Strengths</h3>	<h3>2. Weaknesses</h3>
<ul style="list-style-type: none"> Presence of national supermarket chains (Waitrose and Sainsbury's Local) and associated car parking. A mix of national retailers and independent stores. Low vacancy rates. Railway station just outside the boundary of the District Centre. 	<ul style="list-style-type: none"> Traffic congestion along the A2043 (Central Road) affects environmental quality and acts as a barrier to pedestrian movement. The centre lacks a focal point. Poor rail frequency with only 4 trains per hour
<h3>3. Opportunities</h3>	<h3>4. Threats</h3>
<ul style="list-style-type: none"> Opportunities for intensification at appropriate sites, including additional storeys and/or redevelopment, for example at Waitrose and telephone exchange. Opportunities to enhance approach to the station. Enhance pedestrian connections, including between Waitrose and Central Road. If Crossrail 2 station is delivered at Worcester Park station this would improve connectivity. 	<ul style="list-style-type: none"> Lack of progress on ambitions for Worcester Park rail service given pause on Crossrail 2. Introduction of further permitted development rights that remove the requirement for planning permission could further undermine High Streets.

Towards a Policy Approach

10.12 Based upon the evidence and analysis, the Council has established a series of policy principles for consideration as part of this Regulation 18 consultation. These are:

10.C Draft Policy Principles 10 on District Centres Strategy

The Council will support District Centres to meet the retail, community and leisure needs of the borough's residents, and to accommodate housing and employment growth which respects the character and historic environment.

The Council will direct retail and town centre uses to the Primary Shopping Areas defined for each of the District Centres. Proposals for retail and town centre development will be supported in accordance with Issue 27 Town Centres and Retail.

The Council will support the delivery of better retail space and other town centre uses which meet local needs.

The Council will enable delivery of new homes in the District Centres in accordance with the spatial strategy.

The Council will expect proposals to deliver high quality, well-designed development which respects the character of the centre and improves the public realm/interface.

Carshalton

The Council will:

- a Support proposals to bring back vacant commercial properties into appropriate town centre uses provided they conserve and enhance the Conservation Area, including the former Fox and Hounds Public House.
- b Support proposals for the redevelopment of the pharmacy site (27-29 High Street) that conserve and enhance the Conservation Area and maintain active ground floor frontages with appropriate town centre uses.
- c Support the redevelopment of Beacon Grove to improve the appearance of the northern side of the High Street in order that it enhances the character and appearance and respects the key elements of the Conservation Area.
- d Expect development in Carshalton District Centre to conserve, and where practicable, enhance the Carshalton Village Conservation Area including its heritage significance and setting. Development proposals should have regard to the Carshalton Village Conservation Area Character and Management Plan.
- e Support improvements to the legibility and pedestrian links from the High Street to The Grove.
- f Work with Transport for London to relieve traffic flow and improve the pedestrian experience around Carshalton Ponds and the High Street.

Cheam

- g The Council will support proposals for redevelopment / intensification of appropriate sites to deliver new housing and additional community or commercial space, including sites located adjacent to the train station.

- h The Council would welcome the redevelopment of those buildings which have a negative impact on the Conservation Area provided they conserve and enhance the Conservation Area and maintain active ground floor frontages with appropriate town centre uses.
- i The Council will expect development in Cheam District Centre to conserve, and where practicable, enhance the Cheam Village Conservation Area including its heritage significance and setting. Development proposals should have regard to the Cheam Village Conservation Area Character and Management Plan.
- j The Council will work with Transport for London to resolve the traffic congestion at the crossroads so that any junction improvements conserve and enhance the Conservation Area.
- k The Council will seek opportunities to improve the public realm to improve the pedestrian environment and enhance connectivity and accessibility.

Hackbridge

- l Regarding redevelopment of sites around the station, support proposals for redevelopment to provide a mix of uses.
- m Support tall and mid-rise buildings in appropriate locations, as set out in Issue 39.
- n The Council will work with Network Rail to provide an improved station and forecourt at Hackbridge.
- o The Council will seek opportunities to improve the public realm to improve the pedestrian environment and enhance links to the surrounding open space, including the proposed nature reserve at Beddington Farmlands.

North Cheam

- p The Council will support proposals for the redevelopment / intensification of appropriate sites to deliver new housing and additional community or commercial space, in particular the redevelopment of the Victoria House site (Site Allocation 35).
- q Support tall and mid-rise buildings in appropriate locations, as set out in Issue 39.
- r The Council will seek opportunities to improve the public realm to improve the pedestrian environment and connections with the existing Sainsbury's supermarket.

Rosehill

- s The Council will support proposals for the redevelopment / intensification of appropriate sites to deliver new housing and additional community or commercial space, including the potential redevelopment of the Lidl supermarket site.
- t The Council would like to see the conservation and enhancement of The Market shopping parade on Wrythe Lane and Rose Hill, particularly the upper floors of the parade.
- u Support tall and mid-rise buildings in appropriate locations, as set out in Issue 39.
- v Expect development to respect the key elements of the St Helier Area of Special Local Character.
- w The Council would like to see measures which improve traffic flow around Rosehill roundabout, pedestrian movement around the roundabout and across Wrythe Lane and improve the public realm generally.
- x The Council will continue to safeguard the potential tram route at Rosehill as part of a Colliers Wood to Sutton line, and promote the interim use of the safeguarded route for sustainable modes of transport including walking and cycling.

Wallington

- v The Council will support retention and improvements to the quality of existing office space, and provision of new office space, in Wallington where there is market demand.
- z Support proposals for the redevelopment of the area around the station to deliver taller buildings and mixed use development.
- aa Support proposals for the redevelopment of the north side of Ross Parade. These redevelopments should provide a mixture of residential and town centre uses and the public house and building supplies premises should be retained.
- bb The Council will support proposals for the redevelopment / intensification of the Lidl supermarket site to retain the supermarket and deliver additional new homes.
- cc Support proposals for the redevelopment of Shotfield Car Park. The redevelopment should include residential uses or town centre uses and retain an element of public car parking.
- dd Support tall and mid-rise buildings in appropriate locations, as set out in Issue 39.
- ee Support improvements (or redevelopment to provide new homes and town centre uses) to the Sainsbury's supermarket to interact better with the rest of the centre. In particular, the Council would support an active frontage on Woodcote Road and a more active frontage on Stafford Road.
- ff The Council will seek opportunities to improve the public realm to improve the pedestrian environment, enhance connectivity and accessibility, and improve the access and legibility to and from Wallington station.
- gg The Council will work with partners to deliver flood alleviation schemes at Wallington station and Beddington Gardens. Work with partners to deliver flood alleviation schemes at Wallington station and Beddington Gardens.

Worcester Park

- hh The Council will support proposals for the redevelopment / intensification of appropriate sites to deliver new housing, town centre uses and/or additional community or commercial space.
- ii The Council will support proposals to improve the quality of the approach to the station, including proposals to provide new development of an appropriate scale.
- jj Support tall and mid-rise buildings in appropriate locations, as set out in Issue 39.
- kk The Council will work with partners to deliver a flood alleviation scheme in the area.
- ll The Council will work with the Royal borough of Kingston upon Thames and Transport for London to identify and resolve constraints to traffic flow on the road corridor North Cheam - Worcester Park - Old Malden - A3 roundabout, which will improve traffic flow and air quality levels at Worcester Park.
- mm Work with the Royal borough of Kingston upon Thames, the Mayor of London, Transport for London and Network Rail to deliver Crossrail 2 services to Worcester Park station.
- nn The Council will seek opportunities to improve the public realm to improve the pedestrian environment and improve connectivity/accessibility, and enhance links to the surrounding open space.

10.D Regulation 18 Consultation Questions



- A. Do you agree with the draft policy and proposals for the District Centres?
- B. If you do not support the draft policy and proposals, please give reasons and where possible suggest alternatives.
- C. Can you suggest additional sites and proposals?

Issue 11 - Wandle Valley Area Strategy

11.A Introduction

- 11.1** The Wandle Valley was originally defined as a growth corridor in the London Plan 2016. The current London Plan 2021 still recognises the importance of the Wandle Valley for employment in south London, stating its strategic industrial areas should be retained and enhanced for such purposes. In addition, London Plan Policy G1 'Green Infrastructure' seeks to protect and enhance green infrastructure. The Mayor's SPG Green Infrastructure and Open Environments, the all London's Green Grid March 2012 identifies the Wandle Valley as a Green Grid Area which focuses on open space, biodiversity, sustainable transport, urban greening and heritage improvements.
- 11.2** For Sutton, a key area of the Green Grid is the Wandle Valley Regional Park, which covers Beddington Farmlands, Beddington Park, the River Wandle and some open spaces beyond the immediate area. It covers and connects the London boroughs of Sutton, Croydon, Lambeth, Merton and Wandsworth. The area is designated in the Adopted Local Plan as a Site of Importance for Nature Conservation, Metropolitan Open Land and Metropolitan Green Chains. The Beddington Farmlands area within the Wandle Valley is being transformed into a 161 hectare Nature Reserve to maximise opportunities for birds and wildlife. This will provide a new accessible open space for local people and visitors to enjoy.
- 11.3** The Wandle Valley Area includes Beddington Village and its surroundings, Hackbridge District Centre and its surroundings and Beddington Corner.
- 11.4** Historically, water mills were located along the river over time which have developed into some of the industrial areas that are present today. As a result, the Wandle Valley continues to play an important strategic role in terms of London's industrial capacity, through Beddington Strategic Industrial Location (SIL).

11.B Context for Sutton

Wandle Valley Renewal

- 11.5** In the Adopted Local Plan (2018) the Wandle Valley Renewal Policy was established to deliver new housing and employment to ensure local needs were met. It addressed the parts of the Wandle Valley Regional Park that fall within Sutton, supporting the provision of local open spaces, creating a better environment and seeking to improve the water quality, accessibility, visual appearance and biodiversity benefits of the River Wandle. Hackbridge was designated as a District Centre in 2018, which supports existing and planned growth.

Ongoing support for the area - Wandle Valley Area Strategy

- 11.6** The implementation of the Wandle Valley Renewal Policy, alongside close working with the local community and stakeholders, has successfully delivered many of these proposals and projects. Stakeholders like the neighbourhood forums, The

Wandle Trust (now the South East Rivers Trust), Wandle Valley Regional Park Trust, other community groups, the Council, The London Wildlife Trust, Greater London Authority, Transport for London, the Environment Agency, Sustrans and Thames Water have worked together to secure a wide range of economic, physical and social benefits in the area. Specifically these initiatives have brought forward better quality public sector housing, improved industrial environments, better shops and services, accessible public open space, transport infrastructure improvements in Beddington SIL, flood mitigation measures and improved open spaces across the area.

- 11.7** There are two neighbourhood forums in the Wandle Valley - the Hackbridge and Beddington Neighbourhood Development Group and the Beddington North Neighbourhood Forum. Both Forums represent a group of local people who formed a voluntary organisation to secure economic, physical and social improvements locally. The Hackbridge and Beddington Corner Neighbourhood Plan, developed by its Forum was formally adopted and became part of the development plan for Sutton in 2019. Several of the proposals and projects listed in the Adopted Local Plan were included in the Hackbridge and Beddington Corner Neighbourhood Plan. The Neighbourhood Plan goes further and identifies a number of other projects, which the Council will support the delivery of where possible. The Beddington North Neighbourhood Forum is working towards producing a Neighbourhood Plan for Beddington.

Towards a Policy Approach

- 11.8** Based upon the evidence and analysis, the Council has established a series of policy principles for consideration as part of this Regulation 18 consultation. These are:

11.C Draft Policy Principles 11 on Wandle Valley Area Strategy

New Housing

(a) The Council will:

- Work with developers to deliver new housing at Hackbridge Station.
- Consider appropriate redevelopment options for the land to the north of Hackbridge Station.

New Shops

(b) The Council will:

- Continue to promote Hackbridge as a District Centre.
- Protect shops across the Wandle Valley that serve the local residents with everyday goods.

New Employment

(c) The Council will:

- Work with developers to deliver new, improved industrial premises at the New Mill Quarter (former Felnax site) in Hackbridge and Wandle Valley Trading Estate, Beddington Corner. Both sites will continue to be designated as Established Industrial Locations.
- Consider the de-designation of Metropolitan Open Land adjacent to Beddington Lane to accommodate new industrial uses (See Issue 24 on Employment Land and

Waste and Issue 32 on Green Belt and Metropolitan Open Land).

New Infrastructure

(d) The Council will:

- Continue to deliver decentralised energy to new homes.
- Work with partners and landowners to create and improve foot and cycle routes across the area, notably to Mitcham Junction and towards Croydon from Hackbridge.
- Support the Wandle Valley Forum to lead on securing external funding for a replacement pedestrian bridge.

New Open Space

(e) The Council will:

- Ensure that Beddington Farmlands is restored according to the relevant planning permissions, Conservation Management Scheme, Section 106 Agreements and Restoration Management Plan to become a significant new nature reserve in Wandle Valley Regional Park. The Council will ensure that Beddington Farmlands provides high quality greenspace, progressively becoming open to the public and delivering high-quality habitats for common and protected species.

Better Transport

(f) The Council will:

- Improve signage across the Wandle Valley.
- Seek to improve pedestrian links between Mill Green and Poulter Park.
- Beddington Lane improvements will continue to be sought as part of any proposed planning applications.

Better Environment

(g) The Council will:

- Work with Thames Water to reduce the effects of Beddington Sewage Treatment works on the environment and local area.
- Continue to work with Transport for London to reduce the effects of air quality and encourage sustainable transport and to improve the quality of the public realm in Beddington Village.

Community Initiatives

(h) The Council will:

- Encourage community representatives to collaborate to fund local projects, in accordance with the Council's Neighbourhood Fund or local committee grants.
- Work with the Hackbridge and Beddington Corner Neighbourhood Development Group to support the delivery of projects in the adopted neighbourhood plan.

The River Wandle

(i) The Council will:

- Continue to work with Transport for London, the Environment Agency, Sustrans, Thames Water, The London Wildlife Trust, the Wandle Valley Regional Park Trust, Groundwork London and the South East Rivers Trust to:
 - Improve the water quality of the River, in particular lowering levels of

phosphates and limiting sewage and road run off.

- Expand the network of walking and cycling routes including the Wandle Trail.
- Seek to improve the visual appearance and biodiversity value of the Beddington Carrier.
- Achieve good ecological potential for the River Wandle by 2027.

11.D Regulation 18 Consultation Questions

?

- A. Do you support the continuation of the Wandle Valley Area Strategy, its proposals and projects?
- B. Can you suggest any additional sites or proposals?
- C. If you do not support the draft policy, please give reasons and where possible suggest alternatives.

Issue 12 - Strategic Housing Requirements

12.A Introduction

- 12.1** Whilst Sutton has a very strong track record of meeting its housing targets, like every local authority in England, the borough still has a shortage of housing. As such, Sutton must deliver more homes to meet the needs of its communities, particularly for affordable housing.
- 12.2** The borough's ambition is to ensure that everyone in Sutton lives in a good quality home that they can afford. To meet the varied needs, this plan will seek to enable the delivery of new homes of different sizes, tenures, and function, with a particular focus on how more affordable homes and family sized units can be delivered. The following chapters set out the issues, options and, in some instances, potential draft policies that will support the borough in meeting these needs under this overarching strategic policy on housing.

12.B Context for Sutton

- 12.3** Sutton is typified as an outer London borough dominated by predominantly privately owned, Victorian and interwar, low density residential neighbourhoods. House prices in the borough have risen significantly in recent years and residents are experiencing affordability issues arising from the relationship between local incomes and house prices. Since 2013, Sutton's median house price has increased by 63%, significantly outstripping wage increases over the same period. The Government Standard Method for calculating housing need concludes that the median house prices are over 14 times higher than median earnings, putting home ownership out of reach for many Sutton residents (see Issue 1).
- 12.4** As a result of demographic change, Sutton is experiencing increased demand for homes, decreasing affordability, rising homelessness with its associated need for more temporary accommodation, as well as issues around providing suitable dwellings for particular groups such as families and the elderly. Whilst the private rented sector meets the needs of many people and will play an increasingly important role over the plan period, there are still those that will need to be supported through social rented housing stock. Without addressing these issues, it is likely that there will be continued pressure for temporary accommodation. Therefore, as part of the delivery of new housing, the Council encourages the provision of homes that are affordable to local people. This means housing for sale or rent, for those whose needs are not met by the market.
- 12.5** The NPPF requires that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policy. It sets out that these should include, but not be limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, people who rent their homes, people wishing to commission or build their own homes, and gypsy and travellers. The emerging policy options in the Plan's

housing section seeks to address these needs, namely through emerging policies on: Housing Density; Affordable Housing; Small Sites; Housing Sizes and Standards; Loss of Housing and Conversions; Houses in Multiple Occupation; Build to Rent; Co-Living Housing; Older Persons and Specialist Accommodation; Gypsy and Traveller Accommodation; and Housing and Garden Land.

Towards a Policy Approach

12.6 Based upon the evidence and analysis, the Council has established a series of policy principles for consideration as part of this Regulation 18 consultation. These are:

12.C Draft Policy Principles 12 on Strategic Housing Requirements

- (a) The Council will secure the delivery of new homes across the borough between 2024-2042 of different types, sizes and tenures. The exact number of minimum new homes to be delivered will be determined following consultation on this Issues and Preferred Options document. This will be achieved by;
 - (i) promoting the delivery of new housing, particularly self-contained housing, in appropriate locations across the borough, particularly within highly accessible locations;
 - (ii) the delivery of site allocations and appropriate windfall sites; and
 - (iii) estate regeneration where feasible, viable and supported by existing residents.
- (b) The Council will support proposals for the delivery of housing on suitable small sites (below 0.25 ha in size), where they are consistent with other objectives and policies of the development plan.
- (c) The Council will support development proposals that provide a mix of housing sizes, types and tenures to meet current and future housing need and accord with applicable policies set out in the development plan.
- (d) The Council will support development proposals which seek to meet the needs of specific groups, including; those that require affordable housing, family sized housing, older people, gypsy and travellers, people with disabilities, people who rent their home, and those wishing to commission or build their own home.
- (e) The Council will prioritise the delivery of affordable homes across the borough and require developments to contribute towards the creation of sustainable, mixed, and inclusive communities that respond to local and strategic needs. This will be achieved by securing affordable housing delivery from all residential proposals and requiring a mix of unit sizes and tenures to meet the identified local need.
- (f) The Council will seek to optimise levels of residential density in accordance with a design-led approach, having regard: to site context; connectivity and accessibility; and the capacity and quality of provision of surrounding infrastructure.
- (g) The Council will expect residential development proposals to be of a high design quality, taking into account the character of the area and its ability to accommodate growth.

12.D Regulation 18 Consultation Questions



- A. Do you agree with the draft policy principles for housing issues?
- B. Is there an alternative approach that could be taken?

Please give reasons and where possible suggest alternatives.

Issue 13 - Housing Density and Intensification

13.A Introduction

- 13.1** In order to meet the borough's housing need, Issue 1 on Establishing Sutton's Growth Needs and Issue 2 on Sutton's Spatial Strategy of this document set out options for a spatial strategy to direct growth to appropriate locations in the borough. These options involve the new housing in existing residential areas. A key objective for the Local Plan is to ensure growth is respectful of Sutton's suburban character, historic environment and protects and enhances the borough's local distinctiveness.
- 13.2** The NPPF (paragraph 129) requires plans to contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible. Minimum densities are advised for town centre locations like Sutton Town Centre. This should ensure that housing is built at appropriate densities (as outlined in NPPF Paragraph 128) in areas well served by public transport, while maintaining an area's prevailing character. The NPPF emphasises the importance of creating high quality, well-designed, exemplar, attractive, healthy and sustainable places that are sympathetic to local character. In addition, NPPF (Paragraph 130) states that any significant uplifts in average density of residential development may be inappropriate if the resulting built form would be wholly out of character with the existing area.
- 13.3** Also relevant is the national approach to design. All development will need to meet the criteria contained in the National Design Guide (2021) and local authorities should develop their own local design codes to complement the policies in the plan.

13.B Context for Sutton

Managing Growth and Housing Density

- 13.4** This policy has been developed to ensure that housing density reflects the proposed growth options outlined in Issue 2 on Sutton's Spatial Strategy.
- 13.5** To meet the requirements of the NPPF and the London Plan (2021), careful consideration is needed of the character of an area. To support this Local Plan Review, the Council has prepared a draft borough-wide 'Character Study'. The study defines the characteristics, quality and value of different places in Sutton and identifies which parts of the borough be categorised as (a) conserve; (b) enhance; and (c) transform, as defined in the London Plan Characterisation and Growth guidance document.

Current approach to Housing Density

- 13.6** The Adopted Local Plan policy for optimising the potential for housing growth is based on the London Plan (2016) density matrix. This sets out a range of appropriate densities (depending on public transport accessibility) for new housing within central, urban and suburban settings. These settings reflect the existing

spatial strategy which focuses on housing growth on the borough’s town and district centre network and their Areas of Potential Intensification (APIs) - areas where housing development may be appropriate around the town and district centres. Table 13.1 sets out the details of the current approach to Housing Density.

Table 13.1: Current Local Plan Approach to Density

Density Settings	Applies to Location
Central - Highest Densities	<ul style="list-style-type: none"> • Sutton Town Centre
Urban - High to Medium Densities	<ul style="list-style-type: none"> • API around Sutton Town Centre (based on a walking distance of 800m) • District Centres and their APIs (based on a walking distance of 400m)
Suburban - Low to Medium Densities	<ul style="list-style-type: none"> • Suburban Heartlands - the remainder of the borough outside the open space and industrial designations

Source: Adopted Local Plan (2018)

13.7 The Adopted Local Plan explains how the London Plan (2016) density matrix approach was not compatible with the pattern of development in Sutton's built environment. The reasons for this were as follows:

- 1) The hinterlands of town centres rarely extend more than 200-300 metres from the centre;
- 2) If a 800 metre intensification zone was applied to the town centres, a continuous intensification belt would stretch across the centre of the borough from Worcester Park to Wallington and local distinctiveness would be lost;
- 3) The area around Sutton Town Centre is urban/suburban in character rather than central.

London Plan Design-led Approach

13.8 A review of planning applications and appeals in Sutton has identified that the density matrix is rarely a consideration in determining planning applications. Instead, usually the context, character of an area and quality of design was the determining factor identifying suitable densities. This is not unique to Sutton and was the case across London.

13.9 As such, the approach set out in the London Plan (2021) now seeks to optimise site capacity through the design-led approach rather than prescribing a density matrix (as detailed in London Plan Policies D1, D2 and D3). The design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site’s context and capacity for growth. Higher density developments should generally be promoted in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling.

13.10 To deliver this design led approach in Policy D1, the Mayor has issued the Characterisation and Growth LPG (2023). The purpose of the guidance is to enable

local authorities to establish a character and design - led approach to planning for development and managing growth of places overtime. Sutton's Draft Character Study consists of an assessment of character followed by a growth strategy. This growth strategy informs Local Plan Review policies, design codes, town centre strategies and site capacity assessments.

13.11 The design led approach outlined in Policy D3, is set out in the Optimising Site Capacity : A design-led approach guidance (2023). This approach is the process of setting site - specific design parameters and codes for development sites to provide clarity over future design. These comprise of high level parameters addressing the form, massing and layout of a future development. These design aspirations for small sites and indicative site capacities should be established as part of this Local Plan process.

13.12 London Plan (2021) also contains Policy H1 Increasing Housing Supply, which considers optimising housing density and identifies the types of locations which could be suitable to optimise housing delivery. This policy directs housing to the following locations:

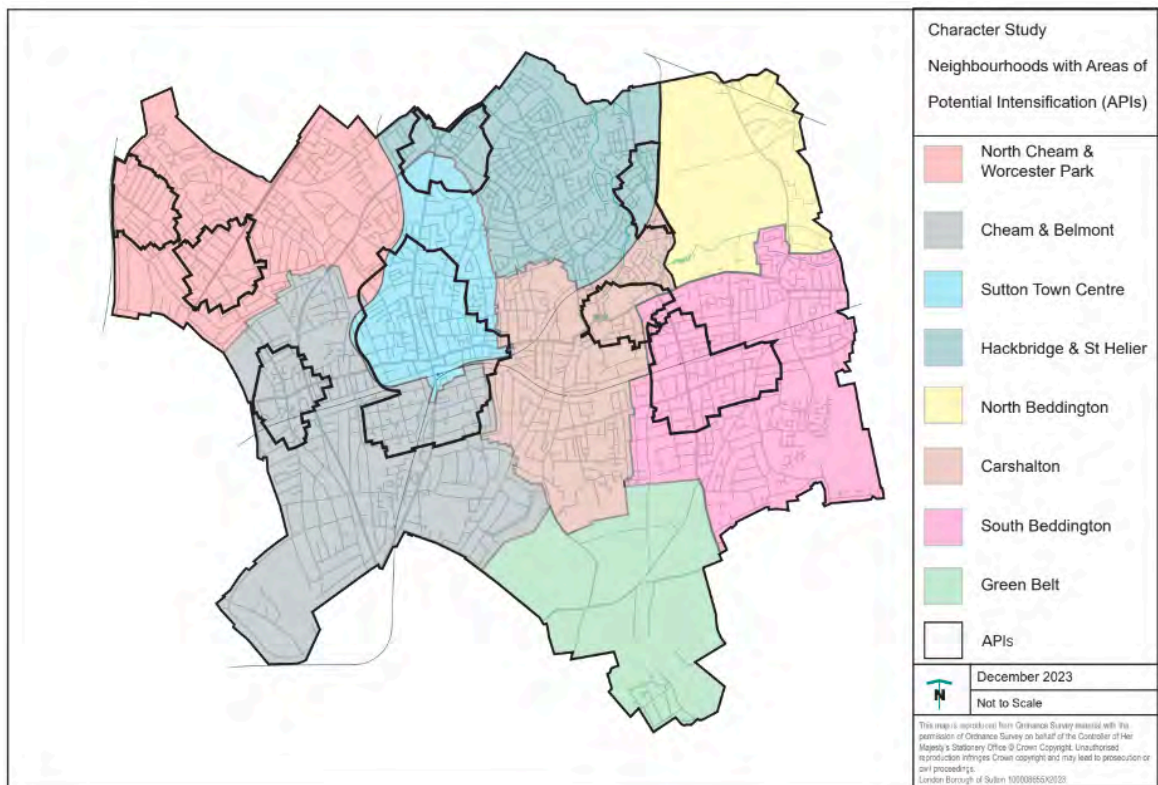
- (a) sites with existing or planned public transport access levels (PTALs) 3-6 or located within 800m distance of a station or town centre boundary.
- (b) mixed-use redevelopment of car parks and low-density retail parks and supermarkets.
- (c) housing intensification on other appropriate low-density sites in commercial, leisure and infrastructure uses.
- (d) the redevelopment of surplus utilities and public sector owned sites.
- (e) small sites.

13.13 In relation to Policy H1 (a) London Plan, the Council agrees that housing should be optimised around existing or planned public transport access levels (PTALs) 3-6. However, the Adopted Local Plan (2018) approach still applies when establishing the zone for optimising housing. Higher density housing would be acceptable within 800m of Sutton's Town Centre. The hinterlands of the district centres in Sutton rarely extend more than 200-300 metres from the centre, drawing a 800m zone around the station or district centres boundary is not appropriate. If a 800m intensification zone was applied to the district centres a continuous belt would stretch across the centre of the borough from Worcester Park to Wallington and local distinctiveness would be lost. The area around Sutton Town Centre is urban/suburban in character rather than central so a blanket approach to optimising housing in this area would not be acceptable.

Delivering a Higher Density Development in Appropriate Locations

13.14 To meet the Council's housing needs, higher density development is supported in certain locations, such as town and district centres. The Council's Draft Character Study provides an assessment of character and a growth strategy. The growth strategy and growth themes identify three categories of growth: conserve, enhance and transform; within Sutton's 8 neighbourhoods (as defined on Map 13.1 below).

Map 13.1: Neighbourhoods and Existing Areas of Potential Intensification



Source: LB Sutton Character Study, 2024

13.15 High density development is likely to be seen in areas where growth themes, enhance and transform, have been identified. Areas identified as conserve will be areas where there are conservation areas, listed or locally listed buildings or Areas of Special Local Character (ASLC) exist and therefore need protection and are not appropriate locations for higher density development. Change can take place but it must be sensitive to maintain the existing character of that area.

13.16 Often high density development is seen as tall towers. Sutton’s Tall Building Study (2024) proposes to define buildings over 21 m or more (or 7 storeys) in height as ‘tall’ (this is discussed in detail in Issue 39 on Tall Buildings). However, higher density development comes in different typologies and is not necessarily tall. For example 5-6 storey apartment blocks, with deep building plots or perimeter blocks wrapping around the edges of the site with lower rise blocks can achieve high density.

13.17 Although there will still be a need for tall buildings to allow for greater density than could otherwise be achieved on lower rise buildings, these buildings will be directed to Areas of Taller Building or Mid-rise Building potential. This will ultimately be defined on the policies map. Whilst a site may be located in an area suitable for tall buildings it does not automatically mean that buildings of appropriate height will be accepted as this is dependent on the detailed design being tested through an iterative process. This policy will work alongside the eventual policy on tall buildings where tall building zones are designated.

Towards a Policy Approach for Sutton

13.18 There are a number of options for the application of this policy, which will be influenced by the outcome of consultation on Issue 1 and 2. The Council considers there are three proposed policy approaches these are as follows:

- **Option 1 - aligns with Spatial Strategy Option 1a ‘Sutton Town Centre’**
Highest levels of density allowed in Sutton Town Centre, including tall buildings, with medium density in the District Centres and lower densities in Suburban Heartlands.
- **Option 2 - aligns with Spatial Strategy Option 1b ‘Sutton Town Centre and District Centre Network’**
To optimise housing, new development should be directed into Sutton Town Centre and the District Centres at the high to medium density levels. This would limit development in Suburban Heartlands.
- **Option 3 - aligns with Spatial Strategy Option 1c ‘Dispersed Development’**
To optimise housing, new development should be directed into Sutton Town Centre, alongside the District Centres and Suburban Heartlands. Sutton Town Centre would accommodate the highest levels of development and density, including tall buildings. The District Centres would deliver high to medium levels of density, recognising that some centres are also conservation areas and have low PTAL levels. Medium level density would be supported in suburban areas.

Towards a Policy Approach

13.19 Based upon the evidence and analysis, the Council has established a series of policy principles for consideration as part of this Regulation 18 consultation. These are:

13.C Draft Policy Principles 13 and Options for Housing Density

1. General Approach to Density

- (a) Development proposals should follow a design-led approach to optimising site density, demonstrating that it is appropriate to the site and the character of the surrounding area as detailed in the Council’s Draft Character Study. This should have regard to areas identified as conserve, enhance and transform.
- (b) Whilst proposals should be design-led, the following options have been developed to give a broad spatial indication of level of density that is encouraged in different parts of the borough:
 - **Option 1a - aligns with Spatial Strategy Option 1 ‘Sutton Town Centre’**
 - Very High Density in Sutton Town Centre and its API.
 - Medium Density in the District Centres and their APIs.
 - Low Density in Suburban Heartlands.
 - **Option 1b - aligns with Spatial Strategy Option 2 ‘Sutton Town Centre and District Centre Network’**
 - High density in Sutton Town Centre and its API.

- High to medium density in District Centre and its API.
- Lower density in Suburban Heartlands.

- **Option 1c - aligns with Spatial Strategy Option 3 'Dispersed Development'**

- High to medium density in Sutton Town Centre and its API.
- Medium density in the District Centres and their APIs.
- Medium to low density in Suburban Heartlands.

- (c) All development proposals should be of a high quality and close to sufficient infrastructure (existing or planned) to meet that development's needs.

2. Coverage of Areas of Potential Intensification

- (d) Intensification, where higher density housing is acceptable in principle, should be directed to 'Areas of Potential Intensification' (APIs), as defined on the policies map. These APIs are defined as:

- **Option 2a - The London Plan Approach**

Intensification of housing should be directed to sites with existing or planned public transport access levels (PTALs) 3-6 or located within 800m distance of a station or town centre and district centre boundary.

- **Option 2b - A Local Approach**

Intensification of housing be directed to sites with existing or planned public transport access levels (PTALs) 4-6, located within 800m distance of Sutton Town Centre and 400m from a District Centre boundary.

13.D Regulation 18 Consultation Questions



- Which policy option 1a, 1b or 1c do you prefer?
- Do you agree with the draft policy on housing density directing higher density housing into the Areas of Potential Intensification?
- Do you agree the Adopted Local Plan should apply an Area of Potential Intensification for 800m from Sutton Town Centre and 400m from District Centres as a better reflection of local character than the London Plan (2021) applies?
- If you do not support the provisions of the draft policy, please give reasons and where possible suggest alternatives.

Issue 14 - Affordable Housing

14.A Introduction

- 14.1** Affordable housing is the provision of homes below their market value. There is general consensus that as well as providing more homes, the Council and its partners should be increasing the delivery of more affordable homes.
- 14.2** Creating more affordable homes has multiple social and economic benefits. It encourages stability by allowing people to have greater choice in where they live, and how much of their income they have to dedicate to paying for the cost of housing.
- 14.3** A greater supply of affordable housing:
- allows people to live closer to where they work, reducing commuting times, and helping stimulate local economic activity;
 - frees up income to spend on other goods and services, including healthcare and education;
 - promotes healthier lives, reduces poverty (especially child poverty), and helps tackle homelessness through providing more safe and secure places to live;
 - promotes social inclusion and reduces inequality by allowing various socio-economic backgrounds to live in the same community, fostering social cohesion and reducing the isolation of marginalised groups; and
 - can help stabilise the housing market itself, diversifying the types of housing product available, and minimise any fluctuations and negative impacts in the broader economy.

14.B Context for Sutton

- 14.4** Sutton is not unique in requiring greater provision of affordable housing. Like many places nationally, and in London, there are challenges facing the borough in terms of:
- **High land and property costs:** Property prices in Sutton are generally high. The cost of land and construction can make it difficult to develop affordable housing without significant subsidies or incentives.
 - **Limited available land:** Sutton has limited available land for new housing, with heritage, environmental, and other policy designations reducing the supply of suitable and available sites.
 - **Population growth:** Sutton's population has been growing steadily, increasing demand for housing. Meeting this growing demand for affordable housing while maintaining the borough's character and green spaces is a complex balancing act.
 - **Community concerns:** There are genuine concerns in many parts of the borough as to how affordable housing will change existing neighbourhoods, increase population density, and have negative outcomes for communities.

- **Viability and funding constraints:** Delivering affordable housing often requires subsidies, grants, or partnerships with housing associations and developers. Securing adequate funding can be difficult, and often a requirement to deliver affordable housing can result in a scheme becoming unviable and not proceeding.
- **Provision of supporting infrastructure:** Access to sustainable transport modes and essential services is critical for the long-term sustainability of affordable housing. A careful balance is required between increasing the provision of affordable housing with the funding and provision of infrastructure.

- 14.5** Alongside these background considerations, the Council’s approach to affordable housing is also directly influenced by policy at a national and regional level.
- 14.6** The National Planning Policy Framework (NPPF) (2023) sets out that each local authority should identify affordable housing need, set a target for delivery, define the different types of affordable housing that will be delivered (e.g. social rented, affordable rented, shared-ownership), and establish the criteria and policy requirements to secure affordable housing in new housing developments/secure financial contributions to fund affordable housing elsewhere.
- 14.7** The NPPF defines affordable housing as *“housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers)”*
- 14.8** At a regional level, the London Plan (2021) sets out a policy framework that Sutton’s Local Plan should be in conformity with in order to be acceptable. Policy H4 sets a strategic target for 50% of all new homes delivered across London to be affordable and requires developments to provide affordable housing through the *“threshold approach”*. Policy H5 provides further detail about how affordable targets are to be met, setting out in greater detail how to apply the threshold approach for different types of application and depending on whether a site is privately or publicly owned, as well as clarifying details on providing viability assessments. Policy H6 sets out the affordable housing tenure splits expected from sites.
- 14.9** The GLA has recently published a draft London Plan Guidance (LPG) on Affordable Housing and Development Viability, which provides further details on how the London Plan policies relating to affordable housing should be implemented.
- 14.10** To help inform the Council’s approach to affordable housing, it has prepared a Local Housing Needs Assessment (LHNA). This provides the evidence base on housing market conditions across the borough, and identifies the local housing needs in the area, including affordable housing needs. As background data, the LHNA has established that there are challenges in terms of the affordability of homes across the borough - to both buy and rent (privately).
- 14.11** Table 14.1 below sets out data for sub-areas across the borough. The data shows lower quartile (prices to buy or rent (privately); median income levels; and any identified income gap.

Table 14.1: Lower Quartile Prices to Buy or Rent

Area	Lower Quartile Price (Existing Dwellings)	Lower Quartile Rent (pcm)
Beddington and Wallington	£281,000	£940
Carshalton and Clockhouse	£400,000	£1,185
Hackbridge, St Helier , the Wrythe	£287,000	£1,060
North Cheam, Stonecot and Worcester Park	£401,000	£1,400
Sutton Local	£295,000	£1,000
Sutton South, Cheam and Belmont	£280,000	£850
All Properties	£300,000	£950

Source: Strategic Housing Market and Local Housing Needs Assessment, 2022

Table 14.2: Median Income in Sutton

Area	Median Income	As % of Sutton Av. (£44,300)
Beddington and Wallington	£41,900	95%
Carshalton and Clockhouse	£51,300	116%
Hackbridge, St Helier , the Wrythe	£37,700	85%
North Cheam, Stonecot and Worcester Park	£50,400	114%
Sutton Local	£42,400	95%
Sutton South, Cheam and Belmont	£47,900	109%
All Properties	£44,300	100%

Source: Strategic Housing Market and Local Housing Needs Assessment, 2022

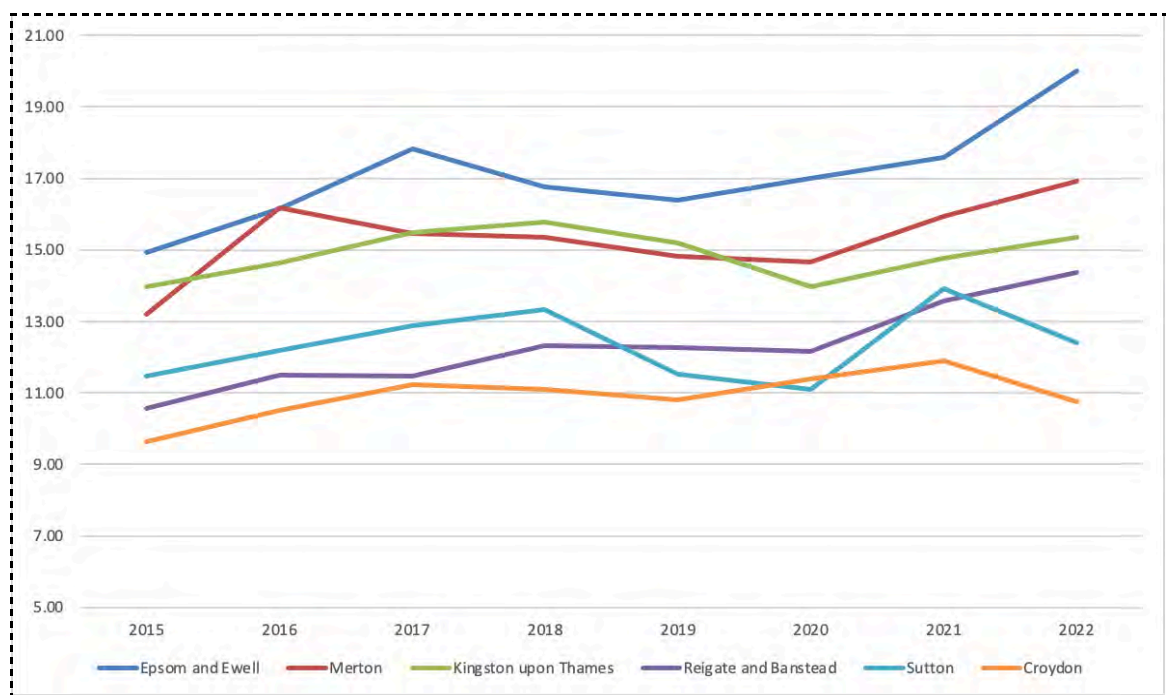
Table 14.3: Income Gap in Sutton

Area	To Buy	To Rent	Income Gap
Beddington and Wallington	£56,200	£37,600	£18,600
Carshalton and Clockhouse	£80,000	£47,400	£32,600
Hackbridge, St Helier , the Wrythe	£57,400	£42,400	£15,000
North Cheam, Stonecot and Worcester Park	£80,200	£56,000	£24,200
Sutton Local	£59,000	£40,000	£19,000
Sutton South, Cheam and Belmont	£56,000	£34,000	£22,000
All Properties	£60,000	£38,000	£22,000

Source: Strategic Housing Market and Local Housing Needs Assessment, 2022

14.12 The analysis has also highlighted Sutton’s relative housing affordability given prices and wages. The key metric used by the NPPF & Planning Practice Guidance (PPG) is an assessment of median house prices when set against median earnings (workplace-based). In Sutton, the figures show that affordability has steadily worsened in the borough, and indeed affordability has worsened in comparison with neighbouring local authority areas, specifically Croydon. Interestingly, affordability has improved in the period 2021 to 2022, which may be an indication of some post-Pandemic price deflation and more challenging conditions for mortgage availability.

Figure 14.1: Ratio of Median House Price to Median Workplace Earnings



Source: ONS - House price to workplace-based earnings ratio

14.13 Utilising the background data, the LHNA has been able to determine affordable housing needs. This requires an assessment of:

- the number of households who have a current need now (based on data from the Council’s Housing Register);
- an analysis of the projected amount of newly forming households who will be in need and unable to afford market housing;
- a calculation of existing households falling into need over time; and
- the forecast future supply of affordable housing.

14.14 The first three elements are added together to identify a gross need, from which the supply is subtracted to identify a need for additional affordable housing. Affordable housing need in Sutton is shown in Table 14.4:

Table 14.4: Affordable Housing Need in Sutton

	Current Need	Newly Forming Households	Existing Households falling in Need	Total Gross Need	Relet Supply	Net Need
Total	353	1,066	135	1,554	158	1,396

Source: ONS - House price to workplace-based earnings ratio

14.15 In addition, the assessment must also account for the need for affordable home ownership. This is because the PPG has widened the definition of those to be considered as in affordable need and now includes: *‘households which can afford to rent in the private rental market, but cannot afford to buy despite a preference for owning their own home’*.

14.16 The evidence and analysis from the study shows that there is a need for **262** affordable home ownership homes per annum. Taken together, the total annual affordable housing need is: **1,658** and is summarised in Table 14.5.

Table 14.5: Estimated Annual Need for Affordable Housing split between Rented and Affordable Home Ownership in Sutton

	Rented Affordable Need	Affordable Home Ownership (AHO) Need	Total Annual Need	% as AHO
Borough-wide	1,396	262	1,658	16%

Source: Strategic Housing Market and Local Housing Needs Assessment, 2022

14.17 These figures provide the starting point for shaping policy, but they do not represent the exact policy requirements or percentage splits of affordable housing requirements. That will in part be informed by viability and also any local priorities such as to maximise provision of rented accommodation as that is likely to be required by households with the most acute needs.

14.18 Also, whilst the data shows a clear affordable housing need, further analysis indicates that the need for affordable housing does not generally lead to a need to increase overall provision. Overall, it is difficult to link the need for affordable housing to the overall housing need; indeed, there is no justification for trying to make the link. Put simply the two do not measure the same thing and, when interpreting the affordable need figure, consideration needs to be given to the fact that many households already live in housing, and do not therefore generate an overall net need for an additional home. Further issues arise as the need for affordable housing is complex and additionally the extent of concealed and homeless households needs to be understood as well as the role played by the private rented sector.

What should the Affordable Housing Requirement be?

- 14.19** The Council's analysis shows that there is a clear need for affordable housing in Sutton, and that the scale of need is significant enough to warrant a policy approach that aims to maximise the provision of affordable housing on-site.
- 14.20** Acknowledging the evidence and analysis, as well as recognising that the Council needs to be in conformity with national and regional policy, actually serves to reduce the range of potential policy options that the Council could explore. The Council considers that it would not be justified or effective to propose a policy approach that deviates significantly from national and regional policy, or does not respond to the latest evidence on need.
- 14.21** It is clear that the policy must set out an approach to maximise the provision of affordable housing, whilst balancing other issues linked to overall housing delivery, the balance of major sites and small sites delivery in the borough, and development viability.
- 14.22** The feedback from the Council's housing team and also dialogue with Registered Providers (as set out in the LHNA) indicates that the preference and focus should be to deliver affordable housing via rented products - social rent / affordable rent, and in preference to affordable home ownership.
- 14.23** The Council's strategic direction is to focus on delivering social rent, but this is more expensive so can be more difficult to deliver than affordable rent in absence of grant funding. However, the Council finds it more difficult to let homes with affordable rent than social rent simply because the rents are still high.
- 14.24** The LHNA has studied the overall need for social and affordable rented housing with a focus on households who cannot afford to rent in the market, with the analysis considering what a reasonable split might be between these two tenures.
- 14.25** Table 14.6 below provides a breakdown of current rent levels in the borough for a range of products along with relevant local housing allowance (LHA) rates. The majority of Sutton falls into the Outer South London Broad Rental Market Area (BRMA) for the purposes of LHA, with a small area being part of the Outer South West London BRMA. Data about average social and affordable rents has been taken from the Regulator of Social Housing (RSH) and this is compared with lower quartile and median market rents (from ONS data). This analysis shows that social rents are lower than affordable rents; the analysis also shows that affordable rents are less than both lower quartile and median market rents, and typically less than 80% of lower quartile figures.

Table 14.6: Rent Levels for different Housing Products in Sutton

Size	Social Rent	Affordable Rent	Lower Quartile Market Rent	Median Market Rent	LHA (Outer South London)	LHA (Outer South West London)
1-bed	£430	£629	£875	£950	£873	£1,047
2-bed	£512	£772	£1,095	£1,195	£1,097	£1,321
3-bed	£590	£949	£1,400	£1,550	£1,371	£1,596
4-bed	£643	£1,072	£1,750	£1,995	£1,730	£2,144
Average	£515	£785	£950	£1,100	-	-

Source: Strategic Housing Market and Local Housing Needs Assessment, 2022

14.26 Having regard to income and affordability, the LHNA has established the proportion of households who would be able to afford each housing product. This is set out in Table 14.7.

Table 14.7: Households that can afford different housing products

Product	% of Households able to Afford
Afford Affordable Rent	35%
Afford Social Rent	31%
Need Benefit Support	34%
All unable to Afford Market	100%

Source: Strategic Housing Market and Local Housing Needs Assessment, 2022

14.27 Finding that only 35% of households can afford an affordable rent does not automatically lead to a policy conclusion on the split between the two types of housing product. For example, many households who will need to access rented accommodation will be benefit dependent and, as such, could technically afford an affordable rent – hence a higher proportion of affordable rented housing might be appropriate – indeed the analysis does identify a substantial proportion of households as being likely to need benefit support.

14.28 On the flip side, providing more social rent products might enable households to return to work more easily, as a lower income would potentially be needed to afford the lower social rent. Social rents are also likely to be required by households whose income is limited by benefit caps, as an affordable rent is likely to take up a very significant proportion of their income – making affordable rents unaffordable.

14.29 Indeed, the LHNA recommends that the Council *should not* have a rigid policy for the split between social and affordable rented housing, even though the analysis is clear that both tenures of homes are likely to be required.

- 14.30** At this stage it is beneficial to refer to the London Plan (2021) and its policy approach to affordable housing, and in particular, Policy H6 and its approach to the tenure split within affordable housing provision.
- 14.31** On the basis of Policy H6, it is considered that the 30% of low-cost rented homes and 30% as intermediate products is reasonable. Within the intermediate category, the Council is mindful of the range of products provided. In particular, if 25% of all affordable homes are provided as First Homes (as suggested by the PPG) then this would squeeze out other forms of intermediate housing [such as shared ownership or London Living Rent (which is similar to affordable rents but is different to London Affordable Rents)]. Given the Council's Corporate Plan 'Ambitious for Sutton' position, and the evidence of greatest need being for rented affordable housing, the Council believes that it has a robust position to provide a lower proportion of First Homes.
- 14.32** Again, given the Council's position and evidence base, it is considered that the 40% (which London Plan Policy H6 says is to be determined by the local authority) should be provided as rented affordable housing (ideally London Affordable Rents or Social Rents).
- 14.33** Where viability makes provision of cheaper rents difficult, the Council could consider other forms of rented housing (such as London Living Rents or affordable rents). On the basis of evidence in this report, it is not recommended that any of this discretionary element (i.e. the 40%) is provided as forms of affordable home ownership. This conclusion is based on the clear finding that the greatest need in the borough is for rented affordable housing, available for households unable to buy or rent in the open market.
- 14.34** Given the desired focus on delivering rented affordable housing, it is worth examining the dynamics of the need for affordable home ownership. The analysis suggests a need across the study area of 262 per annum. In interpreting this figure, it should however be noted that there could be additional supply from resales of market homes (below a lower quartile price) which arguably would mean there is a much more limited need for affordable home ownership.
- 14.35** Analysis does suggest that there are many households in Sutton who are being excluded from the owner-occupied sector (as evidenced by reductions in owners with a mortgage and increases in the size of the private rented sector). This suggests that a key issue in the borough is about access to capital (e.g. for deposits, stamp duty, legal costs) as well as potential mortgage restrictions (e.g. where employment is temporary) rather than simply the cost of housing to buy (although this will be a factor).
- 14.36** Finally, it should be noted that, at the next stage, the Council is required to carry out a full viability study of the cumulative impact of our emerging policy within the Local Plan. This will include scenario testing different levels of affordable housing that could come forward in different types of housing schemes. This evidence will also be used to inform the final affordable housing target.

Towards a Policy Approach

14.37 Based upon the evidence and analysis, the Council has established a series of policy principles and options for consideration as part of this Regulation 18 consultation. These are:

14.C Draft Policy Principles and Options 14 on Affordable Housing

- (a) The Council will maximise the delivery of affordable housing across the borough, and to do so in accordance with both national and regional policy, and the Council's own Corporate Plan. The approach to maximising affordable housing delivery would align with the London Plan's strategic target for 50% of all new homes delivered across London to be genuinely affordable (London Plan Policy H4).
- (b) For development sites that deliver 10 dwellings or more, or which have a gross internal floorspace of 1000m², the Council will seek on-site affordable housing. The Council considers there are three policy options to explore:
- **Option 1a:** seek 35% affordable housing on-site, in accordance with the minimum requirements as defined by the threshold approach for major development proposals set out in London Plan Policy H5; or
 - **Option 1b:** seek 40% affordable housing on-site, representing an up-lift from the London Plan minimum requirement for major development proposals, aligning more strongly with the Council's Corporate Plan, which has delivering quality and affordable housing as one of its' six priorities; or
 - **Options 1c:** seek 50% affordable housing on-site, aligning with the strategic overall target in the London Plan, and marrying up with the minimum requirements for delivery on public sector land. This option would allow Sutton to better meet its identified affordable housing need.
- (c) The Council will seek a tenure split for the affordable housing delivered, so that it can provide a range of tenure types of residents. Regardless of the overall percentage of affordable housing achieved on-site, the Council considers that there are two potential options for how it could approach a tenure split. These are:
- **Option 2a:** a tenure split which achieves 70% low-cost rented products, including social rent and affordable rent; and 30% immediate products, which will include a minimum of 25% First Homes, and other forms of shared ownership. This option balances the delivery of different tenure types and likely viability, but responds to the LHNA evidence that indicates a greater requirement for low-cost rented products in Sutton; or
 - **Option 2b:** a tenure split which achieves 85% low-cost rented products, including social rent and affordable rent; and 15% immediate products. This option emphasises the need for low-cost rented products in Sutton, and would require that 50% (of the 85%) would be affordable rental products and the remaining to be other social rent products.
- (d) The Council's default position will be that affordable housing is delivered on-site, and

that only in exceptional circumstances will the provision of affordable housing off-site, or a financial contribution in lieu of provision on-site, be considered. If off-site provision (or financial contribution) is sought, this must be justified and such schemes will be required to provide a detailed viability assessment.

- (e) The Council intends to seek a financial contribution, in lieu of affordable housing provision, for development sites that deliver between 2 - 9 dwellings.
- (f) The Council will require all affordable housing to be affordable in perpetuity and secured via planning obligation (Section 106 agreement or appropriate legal deed).

14.D Regulation 18 Consultation Questions



- A. Do you agree with the Council's overall approach to maximise the delivery of affordable housing?
- B. Should the Council consider increasing its overall housing requirement figure in order to increase the potential delivery of affordable housing?
- C. Should the Council set a higher affordable housing percentage target for on-site delivery? Which of the three options do you consider is the most appropriate?
- D. The Council's evidence indicates it should focus the affordable housing tenure split more towards the delivery of rented affordable housing rather than intermediate or affordable home ownership products. Do you support the Council's approach?
- E. The Council has set out two options for the tenure split of on-site affordable housing. Which of the two options do you consider is the most appropriate?
- F. Should the Council pursue financial contributions from smaller sites (2 - 9 dwellings), in lieu of affordable housing provision? What should the financial contribution equate to, and what might it mean for development viability?

Issue 15 - Small Sites

15.A Introduction

- 15.1** Small sites, specifically those under 0.25 hectares in size, play an important role in housing delivery in Sutton. Recognition of how small sites contribute towards housing supply has been acknowledged through the preparation of the London Plan (2021) and London Plan Policy H2 (Small Sites).
- 15.2** In particular, small sites can help deliver increased housing density and a range of affordable housing types. They can also help realise sensitive infill, regeneration, and greater mixed-use development, and offer opportunities to deliver growth whilst preserving existing character and achieving well-connected, sustainable development.

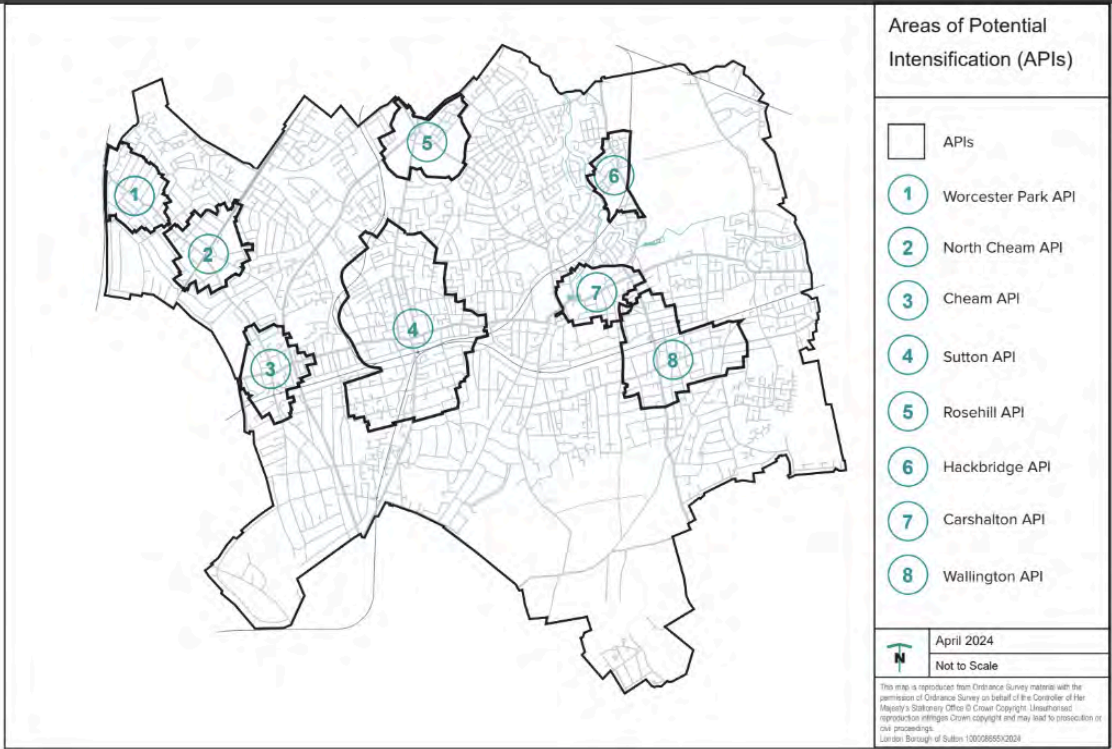
15.B Context for Sutton

- 15.3** Sutton is an outer London borough with a mixture of urban areas and large suburban residential areas. The character of the borough lends itself to delivering small sites (less than 0.25 hectares), and for these small sites to deliver both major development (10 + dwellings) and minor development (1 - 9 dwellings).
- 15.4** The National Planning Policy Framework (NPPF) (2023) sets out how strategic policy-making authorities should identify land for housing. Paragraph 70 specifically notes that: *“Small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. To promote the development of a good mix of sites local planning authorities should: a) identify, through the development plan and brownfield registers, land to accommodate **at least 10% of their housing requirement on sites no larger than one hectare**; unless it can be shown, through the preparation of relevant plan policies, that there are strong reasons why this 10% target cannot be achieved...”* [**Emphasis added**].
- 15.5** At a regional level, the London Plan (2021) sets out a policy framework that Sutton’s Local Plan should be in general conformity with. The London Plan states that small sites must make a substantially greater contribution to new supply, and that increasing the rate of housing delivery from small sites is a strategic priority.
- 15.6** To facilitate an increase in the supply, Policy H2 sets out a strategic approach to delivering small sites, and outlines that boroughs should proactively support well-designed new homes on small sites (below 0.25 hectares in size) through both planning decisions and plan-making. The policy goes on to state that boroughs should identify and allocate appropriate small sites for residential development and list small sites on the brownfield register.
- 15.7** Importantly, Policy H2 also sets out that boroughs should achieve a minimum target for small sites, with the target specified in Table 4.2 of the London Plan. This small

sites target should be a component of the borough’s overall housing targets. The small sites minimum targets in Table 4.2 are informed by the GLA’s 2017 London Strategic Housing Land Availability Assessment (SHLAA). The figures are based on trends in housing completions on sites of this size, and the estimated capacity for net additional housing supply from intensification in existing residential areas taking into account PTAL, proximity to stations and town centres, and heritage constraints.

- 15.8** The London Plan is clear that the small sites target can be taken to amount to a reliable source of windfall sites which contributes to anticipated supply and so provides the compelling evidence in this respect required by paragraph 72 of the NPPF.
- 15.9** Whilst not part of Policy H2, the London Plan also indicates that the incremental intensification of existing residential areas within PTALs 3-6, or within 800m distance of a railway station or town centre boundary, is expected to play an important role in contributing towards the housing targets for small sites.
- 15.10** There is a persuasive argument that incremental change represents a way to deliver intensification and greater delivery on small sites. However, in order to better respond to the suburban nature of the borough, and reflecting its character as an Outer London borough, the Council is consulting on a policy position (see Issue 13) whereby the incremental intensification of existing residential areas is within 800m of Sutton Town Centre, and 400m of each of the District Centres (known as Areas of Potential Intensification or APIs). Reducing the distance from the District Centres will help ensure the character and appearance of suburban residential areas, many of which have limited connectivity and accessibility, are not negatively impacted. This approach is consistent with the Adopted Local Plan (2018).

Map 15.1: LB Sutton’s Areas of Potential Intensification (APIs)



15.11 Sutton does not have a specific small sites policy within the Adopted Local Plan, but the evidence shows that the Council is already achieving considerable housing delivery on small sites. The Council’s monitoring data shows that a significant majority of sites delivered in the borough can be classified as “small sites”, as they are under 0.25 hectares. Table 15.1 shows that between 2013-14 and 2020-21, on average, 94% of sites delivered were under 0.25 hectares. The data also shows that these small sites are delivering a significant percentage of the Council’s housing delivery figures.

Table 15.1: Number of sites delivered in Sutton, by size: 2013-14 to 2020-21

Year	No. of Development Sites Less than 0.25ha	No. of Development Sites More than 0.25ha	Total Number of Sites	% on Development Sites Less than 0.25 Ha
2013-14	71	5	76	93.4%
2014-15	61	7	68	89.7%
2015-16	83	3	86	96.5%
2016-17	95	4	99	95.9%
2017-18	110	7	117	94.0%
2018-19	77	6	83	92.7%
2019-20	65	5	70	92.8%
2020-21	51	2	53	96.2%

15.12 Table 15.2 shows the range across 2013-14 to 2020-21, with an average of 47% of all housing is being delivered on small sites. Of the dwellings being delivered on small sites, there is a balanced picture of whether these sites are deemed to be ‘major’ (10 + dwellings) or ‘minor’ (1 - 9 dwellings) development schemes. Figure 15.2 shows that on average, 62% of schemes delivered on small sites would be considered ‘minor’ schemes, and 48% would be considered ‘major’ schemes.

Table 15.2: Net dwellings delivered in Sutton, by site size: 2013-14 to 2020-21

Year	Net Dwellings delivered on Sites Less than 0.25ha	Net Dwellings delivered on Sites More than 0.25ha	Total Net Dwellings	% of Net Dwellings delivered on Sites Less than 0.25 Ha
2013-14	122	218	340	35.6%
2014-15	160	279	439	36.4%
2015-16	272	134	406	67.0%
2016-17	281	358	639	44.0%
2017-18	403	294	697	57.8%
2018-19	259	316	575	45.0%
2019-20	189	370	559	33.8%
2020-21	197	139	336	58.6%

Table 15.3: Net Dwellings delivered by Site Size and Scheme Size: 2013-14 to 2020-21

Year	Dwellings on Sites Less Than 0.25 Ha (Major 10+)	Dwellings on Sites Less Than 0.25 Ha (Minor 1 - 9)	Total Dwellings on Sites Less Than 0.25 Ha	Percentage on Sites Less than 0.25 Ha (Major 10 +)	% on Sites Less than 0.25 Ha (Minor 1 - 9)
2013-14	0	122	122	0.00	100.0%
2014-15	79	81	160	49.38	50.6%
2015-16	93	179	272	34.19	65.8%
2016-17	137	144	281	48.75	51.3%
2017-18	178	225	403	44.17	55.8%
2018-19	118	141	259	45.56	54.4%
2019-20	72	117	189	38.10	61.9%
2020-21	92	105	197	46.70	53.3%

Figure 15.1: Percentage of Net Additional Dwellings Completed as part of Major (10+) and Minor (1-9) Schemes

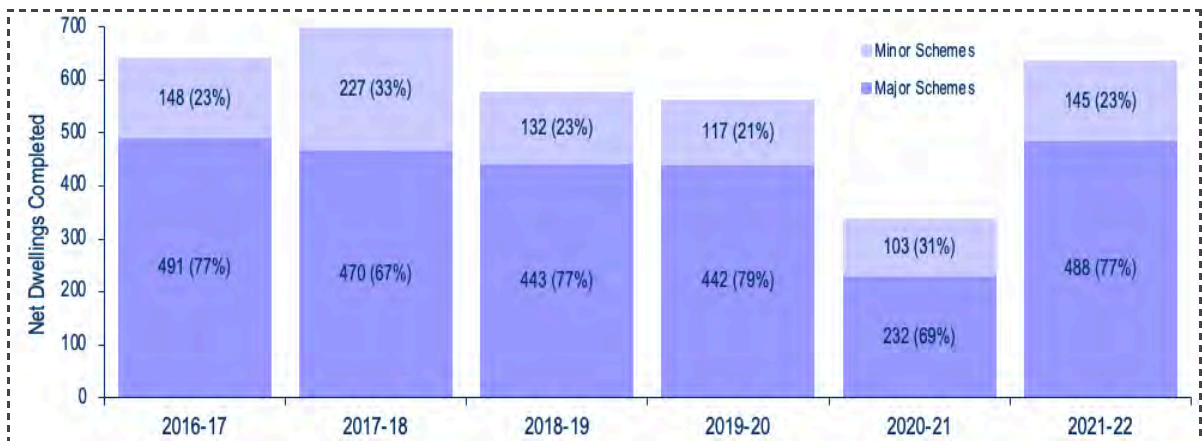
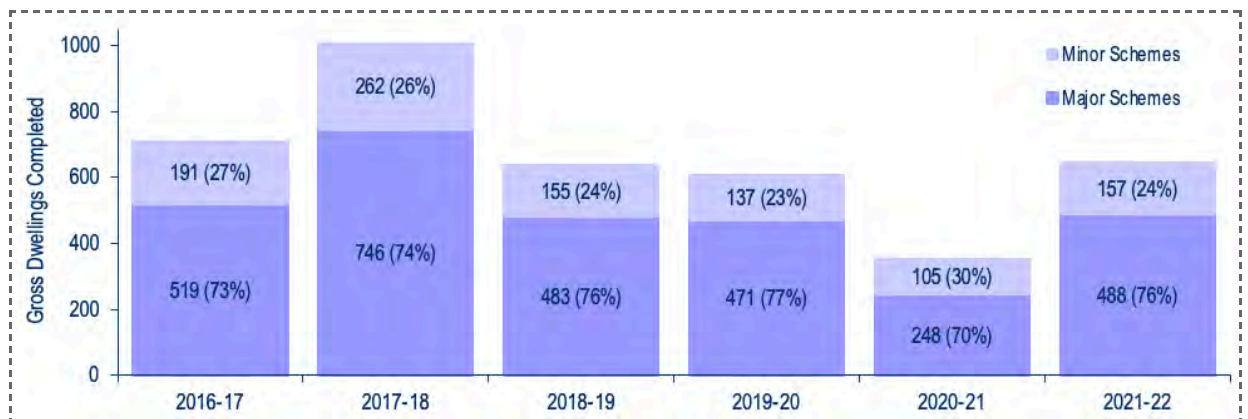


Figure 15.2: Percentage of Gross Additional Dwellings Completed as part of Major (10+) and Minor (1-9) Schemes



15.13 As noted above, the NPPF (2023) requires the Council to identify, through the local plan and brownfield register, sufficient land to accommodate at least 10% of its housing requirement on sites no larger than one hectare. The London Plan (2021) requires

boroughs to proactively support well-designed new homes on small sites below 0.25 hectares, and to achieve the minimum targets for small sites as a component of the overall housing targets.

15.14 For Sutton, the London Plan sets out a minimum target of 2,680 dwellings to be delivered from small sites over 10 years, or 268 per annum. This represents 57% of Sutton's overall housing target set out in the London Plan, which is 4,690 or 469 dwellings per annum (See Issue 1 for further detail).

15.15 Based on the analysis set out above the Council considers that it has an excellent track record in bringing forward small sites, and for those sites to make a significant contribution towards housing delivery. And, as noted, this is without an extant local plan policy to encourage development to come forward. As such, the Council is confident that this scale of delivery will continue into the future allowing it to meet national and regional policy requirements.

15.16 To confirm its position and to underpin the policy approach, the Council has carried out a 'Call for Sites' exercise as part of the plan-making process, and has also prepared a comprehensive Strategic Housing and Employment Land Availability Assessment to inform decisions on future site allocations. This evidence base has been aided by the GLA's Optimising Site Capacity: A Design-led Approach London Plan Guidance (LPG) and the Small Housing Developments and Design Codes LPG. This work has shown that there is a substantial opportunity to continue to deliver appropriate small sites, and indeed increase the output from small sites.

Towards a Policy Approach for Sutton

15.17 Based upon the evidence, the Council considers that there are certain principles to explore as part of drafting the Sutton Local Plan Review, these include:

- The Council will deliver a minimum of 268 dwellings per annum on small sites (below 0.25 hectares).
- The Council will maximise the delivery of well-designed housing on small sites (below 0.25 hectares), which optimise levels of residential density in accordance with the design-led approach in Policy 10 on Housing Density, and the London Plan Policy D6.
- Delivery of small sites will have regard to site context; connectivity and accessibility by walking and cycling and existing and planned public transport (including PTAL); and the capacity and provision of supporting infrastructure.
- The Council will ensure the delivery of small sites does not negatively impact the existing character and appearance of suburban areas, protects family-sized homes, and does not result in negative impacts on residential amenity space, biodiversity, and greenspace.
- In accordance with the Council's affordable housing policy, the Council will seek a financial contribution, in lieu of affordable housing provision, for small sites and those sites that deliver between 2 - 9 dwellings.

15.18 To aid the Regulation 18 consultation, the Council has also proposed a draft policy approach for the borough, this is set out below:

15.C Draft Policy 15 on Small Sites

Proposals for the development of small sites (below 0.25ha) for new homes will be supported where they:

- (a) Take a design-led approach that optimises levels of residential density in accordance with London Plan Policy D6.
- (b) Have regard to site context, connectivity and accessibility by walking and cycling and existing and planned public transport, and the capacity and provision of supporting infrastructure.
- (c) Support appropriate small site development in existing residential areas within:
 - (i) 800m of Sutton Town Centre (as shown on the Policies Map) and have a PTAL rating of between 3 and 6; and
 - (ii) 400m of each of the District Centres (as shown on the Policies Map) and have a PTAL rating of between 3 and 6.
- (d) Protect the suburban character of the borough by ensuring:
 - (i) the proposal would not result in a net loss of the number of family sized dwellings (which will be defined in glossary as 3 bed +)
 - (ii) the height, scale, massing and design of the development proposed would not cause harm to the character and appearance of the area.
 - (iii) it is in accordance with the final version of the 'Loss of Housing and Conversions' policy;
- (e) Encourage innovative approaches to housing delivery - including self-build, custom build and the provision of serviced plots; and
- (f) Provide a financial contribution in lieu of on-site affordable housing where a scheme is delivering fewer than 10 dwellings.
- (g) Are in accordance with the final version of the 'Housing and Garden Land' policy on the acceptability of additional housing on private residential gardens.

15.D Regulation 18 Consultation Questions



- A. Do you agree with the Council's overall approach to maximise the delivery of housing on small sites?
- B. Given the strong track record of delivery, should the Council consider increasing its small sites target to be above the London Plan figure?
- C. If a higher target was set, should the Council set these out as site allocations, or just work towards an annual figure or a percentage target?
- D. Should the Council pursue financial contributions from smaller sites (2 - 9 dwellings), in lieu of affordable housing provision? What should the financial contribution equate to, and what might it mean for development viability?
- E. Do you support the proposed draft policy for small sites? What changes would you make to the policy?

Issue 16 - Housing Mix and Housing Standards

16.A Introduction

- 16.1** One of the key objectives of the Local Plan is to ensure that housing delivery is maintained to help meet the needs of the borough. However, just providing more housing is not enough, it also has to be the right type of housing in the right place. Therefore, the Council will seek to ensure that housing choices are available to address the housing needs of all to achieve mixed and balanced communities.
- 16.2** The NPPF and the London Plan require boroughs to achieve a mix of housing to reflect the current and future needs of the borough's population, including for families with children, for both affordable and market housing over the plan period. The proportions are expected to be informed by a Local Housing Need Assessment. As such the Council commissioned a 'Strategic Housing Market and Local Housing Need Assessment' (LHNA) to help inform the preparation of related policies.

16.B Context for Sutton

Housing Mix

- 16.3** The Sutton LHNA (2022) provides the latest published housing needs evidence in relation to the likely quantum, type, size and tenure of new homes needed across the borough over the plan period. This is summarised in Table 16.1 below.

Table 16.1: Required Homes by Tenure

Projected Size of Tenure	1 Bedroom	2 Bedrooms	3 Bedrooms	4+ bedrooms
Market	10-15%	30-35%	35-40%	15-20%
Affordable Home Ownership	30-35%	40-45%	15-20%	5-10%
Affordable Housing (Rented)	30-35%	30-35%	25-30%	5-10%

Source: Strategic Housing Market and Local Housing Need Assessment, 2023

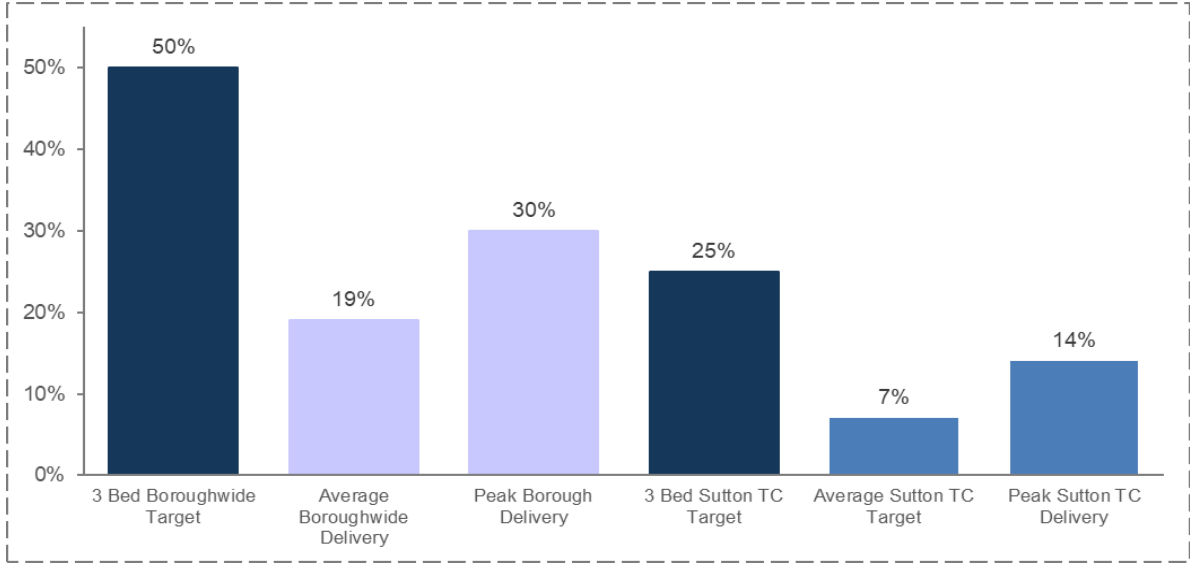
- 16.4** Based on the evidence, it is expected that the focus of new market housing provision will be on 2 and 3 bedroom properties. Continued demand for family housing can be expected from newly forming households. Conversely, for affordable housing, the greatest need is for smaller affordable units (1-2 beds). However, the LHNA stresses that a flexible approach to housing sizes is required. For example, in applying the mix to individual development sites, regard should be given to the nature of the site and character of the area, and to up-to-date evidence of need, as well as the existing mix and turnover of properties at the local level. The Council should also monitor the mix of housing being delivered through its annual Authority Monitoring Report.

Past Delivery of Housing Sizes

- 16.5** The Adopted Local Plan (2018) identified a similar need for housing size mix to the new LHNA i.e. larger market housing and smaller affordable units. However, in

practice it has been difficult to achieve the desired housing mix that includes 50% 3 bedrooms or more on private sites, and 25% in Sutton Town Centre. Figure 16.1 below sets out the delivery since the start of the Adopted Local Plan period in 2016-17 (to 2021-22). The average delivery of 3 bedrooms or more dwellings over this period is 19%, well below the target of 50%. The average delivery in Sutton Town Centre over the same period is 7%, also well below the target of 25%. Consideration needs to be given to; (a) the target for 3-bed homes in Sutton Town Centre; (b) the overall target for the rest of the borough; and (c) whether a target that varies spatially is required. Furthermore, it is important that the minimum requirement remains ambitious but also realistic, given the long term past delivery rates.

Figure 16.1: Past Delivery of 3+ Bedrooms in Sutton 2016-17 to 2021-22



Internal Space Standards

16.6 The Nationally Described Space Standards (NDSS) are a set of national standards for the design of homes. They include minimum dimensions and design criteria to make homes comfortable, safe and adaptable. This includes requirements for the Gross Internal (floor) Area of new dwellings, floor areas and dimensions for key parts of the home, notably bedrooms, storage and floor to ceiling height.

16.7 The London Plan (2021) Policy D6 ‘Housing Quality and Standards’ applies the NDSS as a minimum residential space standard, which supersedes the Council’s own space standards that were set out in the extant Urban Design Guide Supplementary Planning Document (SPD) 2014. In addition, London Plan Policy D6 sets minimum standards for private outdoor space. The Council considers that the London Plan is more up-to-date and therefore the most appropriate basis for assessing space standards. The Council will require residential development to provide floor areas that meet or exceed the minimum space standards for dwellings of different sizes to ensure that all new homes are fit for purpose and offer the potential to be occupied over time by households of all tenures.

16.8 In addition to the importance of minimum space standards is the importance of maximising the provision of dual aspect dwellings, which are far more beneficial for

occupants than single aspect. These benefits include better daylight and sunlight, natural cross-ventilation, a greater capacity to address overheating, pollution mitigation, greater flexibility in the use of rooms, and more potential for future adaptability by altering the use of rooms. Single aspect dwellings should normally be avoided.

Private Amenity Space Standards

16.9 In addition to internal space standards it is also important to secure and set private amenity spaces or private outdoors spaces. These spaces are highly valuable in helping to protect and improve the living standards of residents. Residential units with insufficient garden or amenity space are unlikely to provide good living conditions for future occupiers. For houses, amenity space should be provided in the form of individual rear gardens. For flats, options may include provision of communal spaces around buildings or on roofs.

16.10 The London Plan sets out minimum standards for private amenity spaces, requiring a minimum of 5 sq.m. of private outdoor space be provided for 1-2 person dwellings and an extra 1 sq.m. should be provided for each additional occupant. This space must achieve a minimum depth and width of 1.5m. This does not count towards the minimum Gross Internal Area space standards.

16.11 It could be considered that in a suburban setting, such as large parts of the borough, this minimum private outdoor space standard is inappropriate. The Council's Urban Design Guide SPD has minimum standards of 25m² for flats or 1-bedroom units, 40m² for two-bedroom units and 70m² for three-bedroom units. In some cases, particularly in Areas of Potential Intensification, this minimum standard may be considered too onerous. Therefore, it may be considered more appropriate to use the Council's Urban Design Guide SPD as a guide (or any successor document), rather than minimum standards, taking into account the surrounding local character.

Playspace and Informal Recreation

16.12 Safe places for play are essential for children and young people's mental and physical health and can help to address health inequalities in the borough as areas deprived of play space typically have higher rates of health problems and / or lower life expectancy. As such, it is essential that sufficient spaces for play and informal recreation are provided in new developments.

16.13 Policy S4 of the London Plan sets out standards for play space in new schemes and the Council expects these to be met as a minimum. In addition to sufficient space, a key feature of a successful play space is its 'playability.' Playable space typically includes design elements that act as a sign or signal to children and young people that the space is intended for their play. The Mayor of London 'Shaping Neighbourhoods: Play and Informal Recreation' SPG provides further guidance that should be utilised. If there are genuine reasons why minimum playspace standards cannot be provided on site, the Council will expect financial contributions in lieu.

Housing Accessibility

16.14 Between 2011 and 2021 Census the average age of Sutton residents increased, the number of people aged 50 to 64 years increased by over 19% (whilst the number of

residents between 20 and 24 years fell by nearly 7%) and the number of residents aged over 65 increased by nearly 17%. The Sutton LHNA (2022) indicates a 21% increase in the people aged over 65 in Sutton by 2032, which would account for the majority of total population growth.

16.15 These facts, combined with a trend supporting older people to live in their own homes for as long as possible, means that a large number of new dwellings in the future will need to be accessible for older people with disabilities as well as be available for younger disabled people. To support Sutton’s residents living dignified and independent lives, the Council will apply the accessibility standards set out in Policy D7 of the London Plan, which applies to all dwellings which are created via works to which Part M volume 1 of the Building Regulations applies and not just new build dwellings

Towards a Policy Approach

16.16 Based upon the evidence and analysis, the Council has established a series of policy principles and options for consideration as part of this Regulation 18 consultation. These are:

16.C Draft Policy 16 on Housing Mix and Housing Standards

Housing Mix

- (a) The Council will grant planning permission for new residential development, provided that it:
 - (i) includes a mix of dwellings which is proportionate across tenures.
 - (ii) takes into account the existing housing stock in the neighbourhood in order to avoid any over-concentration of a single size of homes where this would undermine the achievement of creating mixed and balanced communities.

Dwelling Sizes Option 1

- (b) In terms of dwelling sizes:
 - (i) all developments in Sutton Town Centre should seek to provide a minimum of 15% of all dwellings on the site as having three bedrooms or more, unless it can be demonstrated that this would be unviable or the particular site circumstances are not suitable for family housing.
 - (ii) all developments outside Sutton Town Centre should seek to provide a minimum of 50% of all dwellings on the site as having three bedrooms or more, unless it can be demonstrated that this would be unsuitable to the location or not viable.
- (c) On sites particularly suited to larger-sized family houses such as sites over 0.5ha or in an area with a low public transport accessibility level, the Council will expect the proportion of units having 3 bedrooms or more to exceed 55%.

Dwellings Sizes Option 2

- (b) In terms of dwelling sizes, all developments should seek to provide a housing mix in accordance with the indicative proportions in Table 16.2, unless it can be demonstrated that this would be inappropriate to the location or not viable.

Table 16.2 - Indicative Housing Mix

Tenure	1 Bedroom	2 Bedrooms	3 Bedrooms	4+ bedrooms
Market	10-15%	30-35%	35-40%	15-20%
Affordable Home Ownership	30-35%	40-45%	15-20%	5-10%
Affordable Housing (Rented)	30-35%	30-35%	25-30%	5-10%

- (c) On sites particularly suited to larger-sized family houses such as sites over 0.5ha or in an area with a low public transport accessibility level, the Council will expect the proportion of units having 3 bedrooms or more to meet the upper end of the indicative proportions set out in Table 16.2 above.

Housing Standards

- (d) The Council will grant planning permission for new residential development, including conversions, which:
- (i) meet as a minimum internal space standards set out in the London Plan Policy D6 (or any successor document);
 - (ii) meet as a minimum private amenity space standards set out in the London Plan Policy D6 (or any successor document); and
 - (iii) Meet as a minimum the requirements for accessible housing set out in the London Plan Policy D7 (or any successor document).
- (e) The Council will grant planning permission for new major residential development, including conversions, which provides an adequate amount of play space and informal recreation space on site. An adequate amount of play space and informal recreation space will be calculated according to The Mayor's Housing Design Standards LPG (or any successor document).
- (f) All new residential development will be expected to provide dual-aspect accommodation, unless it can be suitably demonstrated that a single aspect dwelling would provide for a more appropriate design solution.

16.D Regulation 18 Consultation Questions



- A. Do you agree with the draft policy on housing mix and housing standards?
- B. Which dwelling size options do you prefer, Option 1 or Option 2? Please give reasons.
- C. If you do not support the provisions of the draft policy, please give reasons and where possible suggest alternatives.

Issue 17 - Loss of Housing and Conversions

17.A Introduction

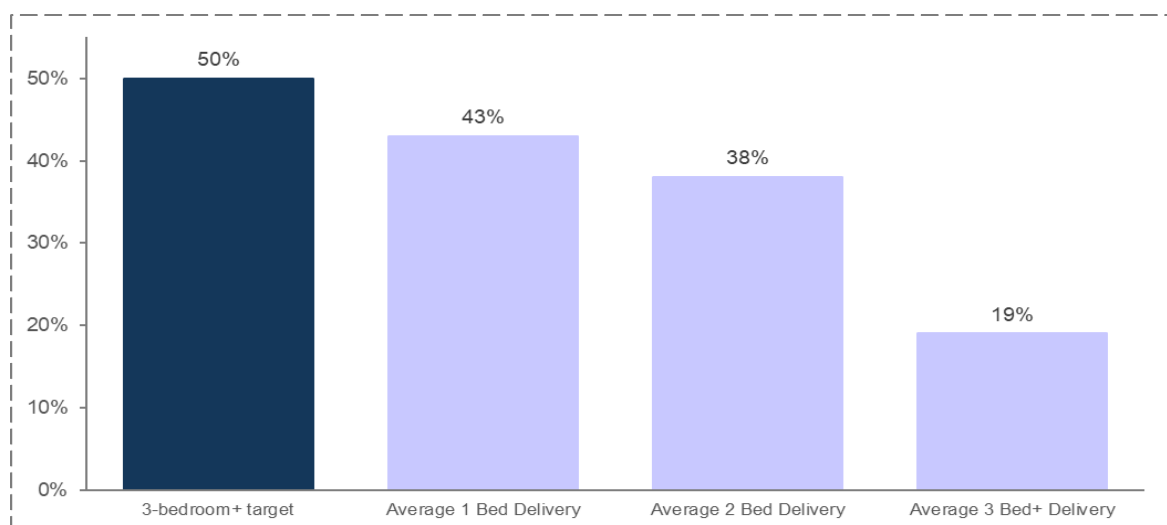
- 17.1** Whilst the provision of new homes is required to meet Sutton's housing requirements, it is also important to ensure that existing residential properties are afforded with sufficient protection. This is because existing properties are an important source of larger and family accommodation, as new housing only accounts for a small proportion of the overall housing stock in the borough. As such, the Local Plan sets out the importance of maintaining the range of dwelling sizes available in the existing stock, especially family-sized housing.
- 17.2** The Council's Adopted Local Plan growth strategy directs the majority of growth towards the borough's town and district centres. This approach has been effective in delivering new dwellings in the most sustainable locations, however the housing mix achieved in these locations has fallen short of the targets for family homes. In addition, the loss of existing family size housing can be difficult to offset through the provision of new build family accommodation in new housing developments which are predominantly located in town centres.

17.B Context for Sutton

Loss of Housing

- 17.3** As set in Issue 16, the LHNA (2022) identifies a strong need for family-sized accommodation in Sutton. This is a similar position to the Adopted Local Plan (2018) which requires 50% of new housing to provide 3 bedrooms or more (and 25% in Sutton Town Centre). However, delivery since the start of the Adopted Local Plan period in 2016 shows that delivery of family homes has been challenging, falling short of policy requirements. This is set out in Figure 17.1 below.

Figure 17.1: Average Housing Mix Delivery 2016-17 to 2021-22

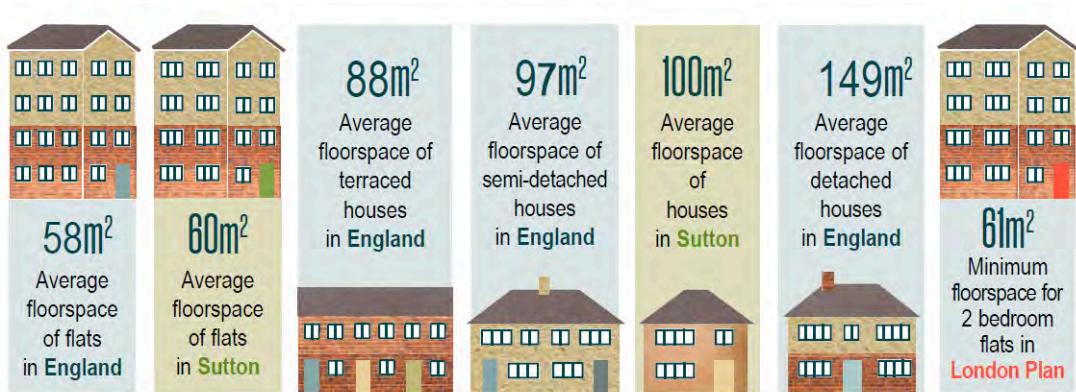


17.4 Given the difficulty in securing new family sized accommodation, which falls well short of the identified need, the protection of existing homes in the borough becomes more important. As such, the Council expects any existing family homes that are lost through demolition or conversion, will need to provide family accommodation on site. However, there are certain circumstances when it may be appropriate for a modest amount of homes to be lost. For example, when a redevelopment produces better quality housing, where smaller sized dwellings are combined to create a family sized unit or when a specific community facility is required, such as for health or education purposes. Instances where loss of units through amalgamation to provide a family-sized unit would, in most instances, only apply to dwellings that have previously been subdivided to enable them to be converted back to a single dwelling as originally built, or when it is proposed to combine small units in purpose-built flats and maisonettes.

17.5 In circumstances where the loss of existing affordable housing is proposed, such as estate regeneration schemes, these will be assessed against the provision of London Plan Policy H8, which includes a need for affordable housing to be replaced by an equivalent amount of affordable housing floorspace and should seek to provide an uplift in the overall affordable housing provision.

Conversions

17.6 The conversion of larger properties into smaller properties is a source of new housing supply and, therefore, the Council will support conversion in appropriate circumstances. This is an important source of supply to support the delivery of small sites.



17.7 However, while some housing types, such as large Victorian villas, can convert into well-designed flats, others, such as inter-war semi-detached and interwar social housing properties, do not. Furthermore, it is important that the creation of additional dwellings is not achieved at the expense of much needed family-sized accommodation. Consequently, the Council is proposing that existing houses with a Gross Internal Area of less than 130m² should not be permitted to convert to flats. The figure of 130m² has been chosen as, below this figure, a house would not be able to convert to two 61m² flats (the minimum standard for a two-bed, three-person flat in London Plan Policy D6), with an allowance for storage, circulation and lobby space. Conversions of existing residential properties to houses in multiple occupation (HMOs) are addressed in Issue 20.

Towards a Policy Approach

17.8 Based upon the evidence and analysis, the Council considers that it can move directly towards a draft policy approach for consideration as part of this Regulation 18 consultation. The draft policy is as follows:

17.C Draft Policy 17 on Loss of Housing and Conversions

Loss of Housing

- (a) The Council will resist the loss of existing self-contained housing. A loss may only be acceptable where:
 - (i) The loss is part of an application which results in better-designed, higher-quality new housing and does not result in a net loss of family sized homes (as originally built); or
 - (ii) The proposal involves combining two dwellings that each have fewer than 3 bedrooms in order to create family-sized dwelling; or
 - (iii) The loss will result in the provision of an essential community facility, where a specific need has been identified and the facility cannot be provided on another site nearby.
- (b) Planning applications that propose the loss of existing affordable housing, including estate regeneration schemes, will be assessed against the requirements of Policy H8 of the London Plan.

Conversions

- (c) The Council will only grant planning permission for development involving the conversion of existing dwellings to provide new self-contained housing units, provided that:
 - (i) The proposal is within one of the Areas of Potential Intensification;
 - (ii) The Gross Internal Area of the dwelling considered for conversion must be at least 130m² (excluding extensions, garages and loft space);
 - (iii) The conversion of any dwelling with more than 130m² of floorspace (excluding extensions, garages and loft space) into flats provides at least one family sized dwelling;
 - (iii) The proposal has no adverse impact on the amenity of neighbouring properties;
 - (iv) The proposal does not detract from the character and appearance of the area, particularly when proposed in Conservation Areas and Areas of Special Local Character;
 - (v) The dwellings proposed meet the London Plan internal space standards; and
 - (vi) The proposal does not adversely affect on-street parking.

17.D Regulation 18 Consultation Questions



- A. Do you agree with the draft policy on loss of housing and conversions
- B. Is the threshold of 130m² correct? Should a different threshold be used?
- C. If you do not support the provisions of the draft policy, please give reasons and where possible suggest alternatives.

Issue 18 - Build to Rent

18.A Introduction

- 18.1** Since the adoption of the Local Plan in 2018 a new housing product has begun to emerge in Sutton in the form of ‘Build to Rent’. Built to Rent developments are purpose built housing that is typically 100% rented out and operate a different model than traditional ‘build to sale’ homes. It can form part of a wider multi-tenure development comprising either flats or houses, but should be on the same site and/or contiguous with the main development. Schemes will usually offer longer tenancy agreements of three years or more, and will typically be professionally managed stock in single ownership and management control.
- 18.2** The NPPF states that build to rent developers will, as a norm, offer longer tenancy agreements of 3 years or more to all new tenants who want one. These are sometimes known as ‘family friendly tenancies’ since they provide longer term security and stability for those who wish to settle down within a community.
- 18.3** The London Plan (2021) Policy H11 sets out the criteria by which development can be defined as Build to Rent, including that the minimum size for such schemes is 50 dwellings and should be held as build to rent for at least 15 years. The London Plan expects schemes to still deliver a minimum of 35% affordable housing.

18.B Context for Sutton

- 18.4** In 2011, 16% of households in Sutton were in private rented housing, very similar to England overall (17%) but below that of London (26%). By 2021, this had increased to 21%. The private rental market in Sutton therefore makes an important contribution to its housing stock. Median rental prices in Sutton (2022) were £1,100 (in increase from around £800 in 2011), higher than the average for England (£795) but below London (£1,450). Sutton has the cheapest median rental prices compared to its neighbouring London boroughs of Croydon, Kingston and Merton. The highest concentration of rental properties are located in Sutton Town Centre and its surrounds. The most common size of rental property in Sutton is 2-bedroom homes.

Table 18.1: Changes in Housing Tenure 2001 to 2021 (Census)

Tenure	2001	2011	2021	Change 2011-2021	
				Number	%
Owned	56,374	53,152	53,047	-105	-0.2%
Social Rented	11,749	11,422	11,667	+245	+2.1%
Private Rented	6,628	12,429	16,683	+4,254	+34.2%
Shared Ownership	403	611	889	+278	+45.5%
Other	1,248	560	61	-499	-89.1%
Total	76,402	78,174	82,347	4,173	+5.3%

Source: Census 2001 to 2021

- 18.5** Table 18.1 above shows that the private rental sector has significantly increased over the last 20 years, including a 34% increase over the last 10 years. Unsurprisingly a number of build to rent schemes are now starting to come forward in Sutton, exclusively in Sutton Town Centre at present.
- 18.6** The Adopted Local Plan does not include a Build to Rent policy and as such the Strategic Housing Market and Local Housing Need Assessment (LHNA) considered the need for Build to Rent products in Sutton. The report concludes that the Council should seek to include a policy on development in order to set out parameters regarding how schemes would be considered with the expectation that there is likely to be some activity moving forward – and this policy should also deal with how affordable housing policies would be applied.
- 18.7** The London Plan Policy H11, makes clear that Build to Rent must also provide affordable housing and this can be entirely discounted market rent, managed by the Build to Rent provider and delivered without grant. In order to follow the Fast Track Route as set out in the London Plan, Build to Rent schemes must deliver at least 35% affordable housing, or 50% where the development is on public sector land or industrial land appropriate for residential uses. Where Build to Rent Schemes are proposed, the Council’s preference for the affordable element is the delivery of low cost rented housing. The threshold should be met with at least 30% let at London Living Rent levels with the remainder at discounted market rents based on a median rent for the borough. .
- 18.8** To ensure Build to Rent developments make a long-term contribution to meeting affordable housing need in Sutton, the covenant period for Build to Rent schemes should be at least 15 years. In line with national Planning Practice Guidance and London Plan, a claw-back mechanism will be applied in order to protect the value of the affordable housing provision that is withdrawn if affordable housing units in Build to Rent blocks are converted to another tenure after the expiry of the covenant period.
- 18.9** The Council notes the requirements of the London Plan for the affordable element of Build to Rent products. However, under “Issue 14 on Affordable Housing” the Council must consider options for the delivery of affordable housing in Sutton. As such the outcome of consultation on Issue 14 will influence the level of discounted market rent that the Council requires for Build to Rent products.
- 18.10** Whilst the LHNA suggests that the Council shouldn’t be overly prescriptive on the mix of dwelling sizes within new Build to Rent development, but the number of Build to Rent schemes proposed is increasing since the evidence was prepared. As such, the Council considers that the mix of dwelling sizes should address the future housing mix set out in the new Local Plan, including family-sized dwellings. Developers will be asked to demonstrate how family-sized units have been designed with a layout primarily to be suitable for family use. This is likely to include a range of bedroom sizes and good living space.

Towards a Policy Approach

18.11 Based upon the evidence and analysis, the Council considers that it can move directly towards a draft policy approach for consideration as part of this Regulation 18 consultation. The draft policy is as follows:

18.C Draft Policy 18 on Build to Rent

- (a) Development proposals for Build to Rent housing in Sutton must be in accordance with Policy H11 of the London Plan. This is subject to the following additional provisions:
 - (i) Schemes must deliver minimum levels of affordable housing that are consistent with the final Local Plan Review Policy on “Issue 14 on Affordable Housing”. The Council expects 30% of the affordable provision at rents equivalent to London Living Rent level, with the remainder at a range of genuinely affordable rents. For this remainder, the Council’s preference is to maximise the proportion of rents provided at a level equivalent to London Living Rent.
 - (iv) Build to Rent housing should provide a mix of dwelling sizes that meets the identified local housing need set out in ‘Housing Sizes and Standards’.
- (b) Build to Rent proposals should have regard to the Council’s Affordable Housing and Viability Assessment SPD (2020) or any successor document.

18.D Regulation 18 Consultation Questions



- A. Do you agree with the draft policy on Build to Rent?
- B. Do you agree that the Council should seek to prioritise London Living Rent or are other products more suitable?
- C. If you do not support the provisions of the draft policy, please give reasons and where possible suggest alternatives.

Issue 19 - Co-Living Housing

19.A Introduction

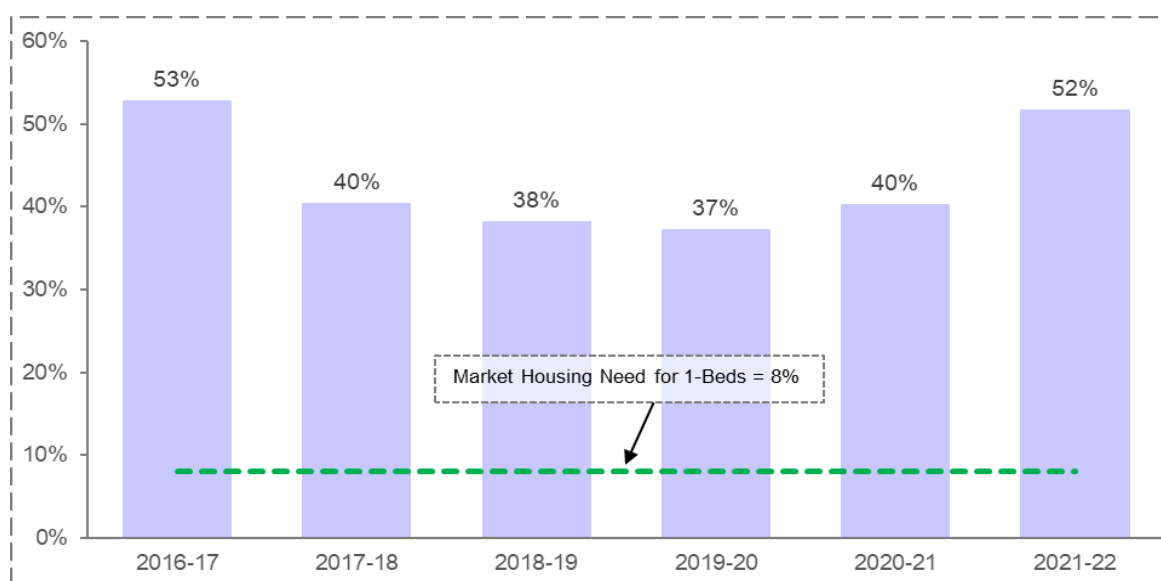
- 19.1** Co-living housing (or 'large-scale shared living developments') is a newly emerging housing product that provides large-scale purpose-built shared accommodation comprising private individual rooms which are not self-contained combined with extensive communal areas and facilities.
- 19.2** Co-living housing differs from self-contained housing (Use Class C3) due to their emphasis on communal living, providing shared kitchen, dining, recreation and often workspaces, with individual private units being smaller than minimum Nationally Described Space Standards (NDSS). Co-living also differs from houses in multiple occupation (HMOs) due to the scale of the developments, greater extent of communal spaces and facilities, and on site-based management services.
- 19.3** Co-living is a relatively new form of housing which is not specifically defined as a separate housing category in NPPF or the planning practice guidance. Furthermore, co-living is not defined in the Use Classes Order, meaning developments are generally classified 'Sui Generis' as large scale non-self-contained market housing. This means that conversion to or from C3 residential or any other use will require planning permission.
- 19.4** The London Plan sets out its position on co-living schemes in Policy H16 'Large-scale Purpose-built Shared Living Development', defining such schemes as generally having at least 50 units. The London Plan considers that tenancies in co-living schemes should be for a minimum of three months to ensure large-scale purpose-built shared living developments do not effectively operate as hostels.
- 19.5** In addition, the London Plan makes it clear that co-living housing is required to contribute to affordable housing. However, because it does not meet minimum housing space standards it is not considered suitable as a form of affordable housing itself. Therefore, a financial contribution is required for affordable housing provided through the borough's affordable housing programme that is equivalent to a minimum of 35% of the units.

19.B Context for Sutton

- 19.6** Whilst there is support in national policy and in the London Plan for co-living housing, the Council needs to consider how appropriate these newly emerging products are at a local level. The Council recognises that different forms of housing are needed to meet different needs, including shared housing such as co-living, the housing need in Sutton concludes that the priority is to secure provision of conventional housing, particularly larger family units for market homes and smaller affordable units. Co-living developments do not properly address either of these needs.

19.7 Firstly, co-living developments, by their very nature, only provide single person accommodation. It is likely that co-living would be most appropriate in town centre locations, given the better access to services and public transport, where there is already a high degree of 1-bedroomed flats. This could lead to over concentration of single person units in these locations and provide no family sized accommodation, which would significantly undermine the ability to achieve mixed and balanced communities. Figure 19.1 below shows the delivery of 1-bedroomed flats since the adoption of the Adopted Local Plan (2018) against the housing mix requirement at the time (8%). This clearly indicates an over delivery on small 1-bedroomed units. The delivery of co-living schemes in Sutton, particularly in the town and district centres, will further exacerbate this.

Figure 19.1: Past Delivery of 1 Bedrooms in Sutton 2016-17 to 2021-22



19.8 Secondly, there is real concern about the impact of co-living schemes on genuine affordable housing delivery. Co-living accommodation, which is defined as a ‘sui generis’ use, does not provide an alternative route to affordable housing to people on low incomes. It is also not necessarily a viable alternative to affordable housing, as: it can be substantially more expensive in rental terms, on a square metre basis, than affordable rented accommodation; the private space provided by most developments consists solely of bedrooms, and therefore does not cater for the needs of residents who wish to continue to live within the borough; it targets a specific and relatively narrow sector of the housing market, focused overwhelmingly on ‘affluent’ single people (or couples without children) in the 18-35 age range (Savills: Spotlight on UK Co-living – May 2023). It generally functions as a short term housing choice for many residents which can lead to a fairly transient population with a high turnover of units.

19.9 For these reasons, the Council will consult on a local approach to co-living development proposals (alongside an option to follow the London Plan approach, which is permissive), which will generally be resisted on sites capable of providing conventional housing to ensure a proper mix of housing can be provided and proper affordable accommodation can be delivered. When considering whether a scheme would be located on a site which is suitable for C3 units the Council will have regard to:

whether a proposal would displace existing C3 residential accommodation; whether a site has been identified in the Local Plan housing trajectory and/or Housing and Economic Land Availability Assessment as having capacity for conventional housing; whether the site is already allocated for residential uses in the development plan; and whether a site has an extant planning permission for C3 housing.

19.10 In addition, the Council will also expect co-living proposals to be supported by detailed evidence on the level of need and demand for this type of development in Sutton. This should identify the target groups which the development aims to attract and the scale of the potential need arising from these groups. It should also set out how the proposed development would meet the needs of the target group, including in terms of the affordability and nature of the accommodation.

19.11 New housing development should make a positive contribution to mixed and balanced communities. One of the benefits presented for co-living schemes is the ability to facilitate communal interaction and should be seen as a positive. However, this should not apply to the scheme in isolation but this should apply to its neighbourhood and the wider community. As such, proposals should demonstrate that the scheme will not result in an over-concentration of single-person accommodation at the neighbourhood level.

19.12 Where a site is able to demonstrate that there is a need and demand, that the site could not be used for mainstream self-contained housing and it would not lead to over concentration of single persons households, the Council will expect an affordable housing contribution in line with the London Plan. This requires a contribution that is equivalent to 35% of the units (or 50 per cent where the development is on public sector land or industrial land appropriate for residential uses). This should be provided at a discount of 50% of the market rent. Developments which provide a contribution equal to 35% of the units at a discount of 50 per cent of the market rent will not be subject to a Late Stage Viability Review

Towards a Policy Approach

19.13 Based upon the evidence and analysis, the Council has established a series of policy principles for consideration as part of this Regulation 18 consultation. These are:

19.C Draft Policy Principles 19 on Co-Living Housing

Option 1 - A Local Approach to Co-Living Developments

- (a) Development proposals for co-living housing will only be supported where it can be demonstrated that:
 - (i) It is not proposed on a site that is suitable for residential accommodation under Use Class C3, having regard to:
 1. whether a proposal would displace existing C3 residential accommodation;
 2. whether a site has been identified in the Local Plan housing trajectory and/or Housing and Economic Land Availability Assessment as having capacity for C3 housing;
 3. whether the site is allocated for C3 residential use in the development plan;

- and
4. whether a site has an extant planning permission for C3 housing.
- (ii) there is a genuine need and demand for co-living housing in the borough;
 - (iii) co-living housing is better suited to meeting the local housing needs than conventional housing;
 - (iv) it would not result in an overconcentration of single-person accommodation, would not be detrimental to neighbours' residential amenity and would not be detrimental to the mix and balance of communities and uses in the area; and
 - (v) it is located in Sutton Town Centre, as defined on the policies map
- (b) Where the criteria for housing can be met, in line with Part (a)(i to v) above, development proposals must:
 - (i) meet the requirements of London Plan Policy H16 'Large-scale purpose-built shared living'; and
 - (ii) submit an appropriately detailed and resourced management plan to demonstrate that the scheme will be managed and maintained over its life to ensure acceptable levels of residential amenity for occupants and neighbouring residents; and
 - (iii) be under single management.
 - (c) Development proposals for housing must contribute towards the delivery of affordable housing. Specifically, proposals must:
 - (i) deliver a minimum of percentage of affordable homes on-site under Use Class C3, at Sutton's required affordable housing threshold (to be defined at the Regulation 19 stage), tenure and size mix; or
 - (ii) provide a financial contribution secured by legal agreement that is equivalent to Sutton's affordable housing threshold (to be defined at the Regulation 19 stage) under Use Class C3, at Sutton's required tenure and size mix'

Option 2 - the London Plan Approach to Co-Living Development

- (a) The Council will support proposals for Co-Living Development that meet the requirements of London Plan Policy H16 'Large-scale Purpose-built Shared Living Development'.

19.D Regulation 18 Consultation Questions



- A. Do you support Option 1 or Option 2 on co-living?
- B. Where Co-Living schemes come forward, what minimum space standards should the Council apply?
- C. If you do not support the provisions of the draft policy, please give reasons and where possible suggest alternatives.

Issue 20 - Houses in Multiple Occupation

20.A Introduction

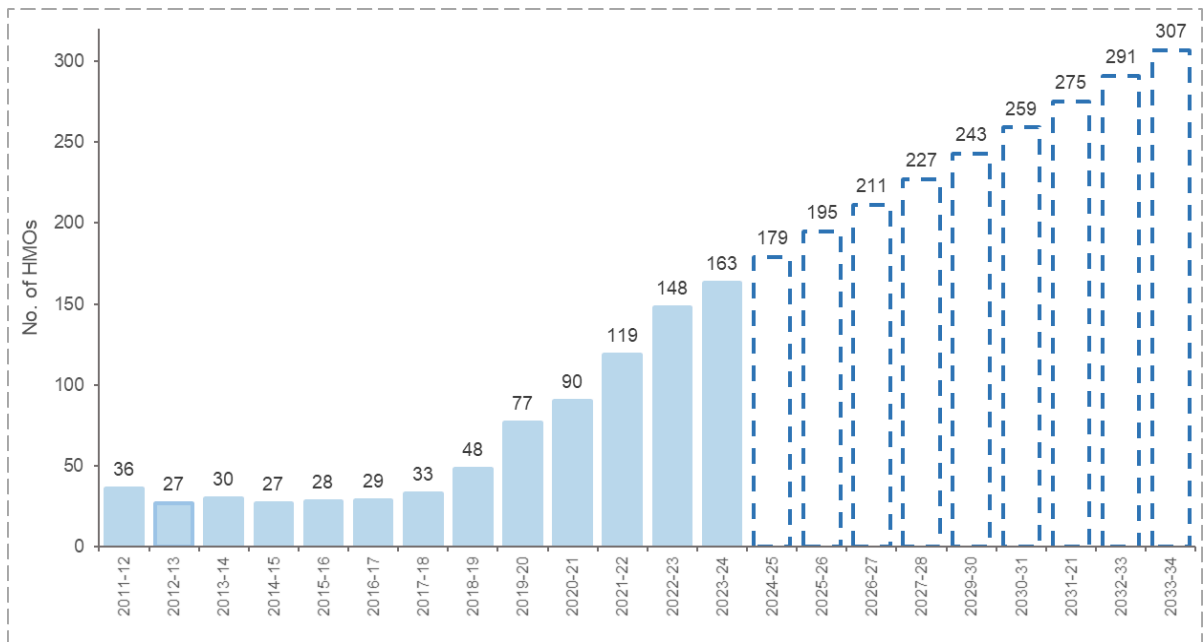
- 20.1** Houses in Multiple Occupation (HMOs) are properties occupied by unrelated individuals who share basic amenities such as a kitchen or bathroom. The traditional source of HMOs tends to be larger, older single family dwelling houses, located in areas with good access to public transport and local services as well as large single dwelling houses that can be subdivided into much smaller accommodation.
- 20.2** The national Planning Use Class order identifies two types of HMOs. Firstly, there are HMOs that fall within the Use Class 'C4'. These are generally 'smaller' HMOs and are shared between 3 to 6 persons. Secondly, there are larger HMOs that fall within the Use Class 'Sui Generis' (SG). These are properties where there are more than 6 occupants. Currently, changes of use between a dwelling house (C3) and small HMO (C4) do not require planning permission as it is permitted development. The change of use from a dwelling house (C3) to a 'large' HMO (Sui-Generis) does however require planning permission.
- 20.3** A local authority can introduce an 'Article 4 Direction', where it can be justified, which removes certain permitted development rights within a specified area, such as the conversion of houses to small HMOs. When adopted, the effect of the Article 4 Direction is that planning permission is required for the specified use that would not otherwise require an application for planning permission.

20.B Context for Sutton

- 20.4** HMOs play an important role in the local housing market in Sutton, offering a flexible form of accommodation that is often cheaper than self-contained housing within the same area. However, concentrations of HMOs are often associated with poor standards of accommodation, loss of local character, increased complaints, increased anti-social behaviour, loss of family houses, increased pressures on car parking and local services. Therefore it is important that when HMOs do come forward the Council can strike the right balance between facilitating new homes but also ensuring they are in the right places, are of a high quality and do not impact negatively on existing communities.
- 20.5** The number of HMOs in Sutton are now increasing year-on-year after a long stable period and are projected to continue growing into the future. Figure 20.1 below shows the number of HMOs remained static between 2011-12 and 2017-18, but since this date the number has been increasing, growing by +130 or +394% in just 7-years, an average of 19 new HMOs per year. Since the start of 2023-24 the number of HMOs has already grown by 15 in just 3 months, when it exceeded the average increase over the last 7-years. Overall this demonstrates that there has been a rapid growth in HMOs in Sutton in recent years which is expected to keep on increasing (Figure 20.1 shows an increase of 753% between 2011-12 and 2033-34). It is also important to reiterate that this only includes licensed HMOs and not those below

the threshold. As such, the actual number of HMOs will be higher, putting pressure on family housing that benefits from permitted development rights.

Figure 20.1: Growth in Licensed HMOs and Projected Future Growth



20.6 The Council is concerned about the growth of HMOs, particularly as the vast majority involve conversion of family sized homes and a significant number do not require planning permission. The conversion of existing dwellings to HMOs can have a cumulative effect of adding pressure on off-street car parking and local services. Residential conversions may be appropriate in certain types of property or street, particularly where they are highly accessible; however, even in such locations they can harm the character of areas by changing external appearance and increasing activity. Such activity can have an adverse impact on the amenity of neighbouring properties creating more noise, waste, overcrowding, people movements and increased vehicular movements.

20.7 The spatial distribution of HMOs across Sutton confirms that the majority of licensed HMOs are clustered around Sutton Town Centre and Wallington District Centre, particularly along the railway lines, with some located in the residential hinterland between the two. There is also clustering around Sutton’s other district centres too. Something important to note about these areas is that the majority of the boroughs conservation areas and ASLCs are located in and around Sutton’s town and district centre network, with growing concentrations of HMOs within these important heritage areas.

20.8 As such, the Council has taken the decision to introduce a Non-immediate Article 4 Direction to ensure that all HMOs in Sutton are subject to the full scrutiny of the development, the impacts can be fully assessed and that they are direct to places with the best access to public transport and services.

Towards a Policy Approach

20.9 Based upon the evidence and analysis, the Council considers that it can move directly towards a draft policy approach for consideration as part of this Regulation 18 consultation. The draft policy is as follows:

20.C Draft Policy 20 on Houses in Multiple Occupation

- (a) Proposals for new houses in multiple occupation (HMO), and extensions to existing HMOs that result in an increase of residents, will be permitted, provided that the proposal:
- (i) Does not result in the loss of larger family sized housing (houses with 3 bedrooms or more).
 - (ii) Is within one of the Areas of Potential Intensification.
 - (iii) Does not lead to a concentration of HMOs in the vicinity where the cumulative effect of the HMOs harms the character of the area. Concentration which harms the area will be considered as where more than 20% of dwellings 100 metres either side of the proposal site are HMOs.
 - (iv) Has no adverse impact on the amenity of neighbouring properties, including as a result of cumulative impacts.
 - (v) Does not detract from the character and appearance of the area, particularly when proposed in Conservation Areas and Areas of Special Local Character.
 - (vi) Meets the minimum room sizes set out in the Licensing of Houses in Multiple Occupation (Mandatory Conditions of Licences) (England) Regulations 2018 or any successor regulations.
 - (vii) Does not adversely affect on-street parking.
- (b) Proposals for the loss of an HMO will be supported where:
- (i) it results in the creation of family sized dwellings, unless it can be demonstrated that family sized dwellings would be unviable or inappropriate to the location.
 - (ii) it results in a reduction in concentration of HMO's in an area where there is evidence of existing harm to the amenity of neighbouring properties.

20.D Regulation 18 Consultation Questions



- A. Do you agree with the draft policy on HMOs?
- B. If you do not support the provisions of the draft policy, please give reasons and where possible suggest alternatives.

Issue 21 - Older Persons, Supported and Specialist Accommodation

21.A Introduction

- 21.1** The Council understands its obligation to help meet all types of housing needs for all different groups within the community, as well as its duties stemming from the Equality Act 2010.
- 21.2** Chapter 5 of the National Planning Policy Framework (NPPF) (2023) identifies that the size, type and tenure of housing needed should be assessed by the Council, and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes).
- 21.3** Perhaps most pressing is the need to provide appropriate accommodation for an increasingly older population. The Planning Practice Guidance (PPG) notes that offering older people a better choice of accommodation to suit their changing needs can help them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems.
- 21.4** In creating a policy approach that can help meet all types of housing need, the Council will explore provision of:
- **Specialist Housing for Older Persons** - such as extra care housing, dementia care homes, and age-restricted housing communities.
 - **Supported Housing** - such as sheltered housing for the elderly, hostels for the homeless, and supported living for individuals with disabilities. These accommodations are staffed to provide assistance and support to residents.
 - **Transitional Housing** - temporary housing for individuals facing crises, such as domestic violence victims, while longer-term solutions are sought.
 - **Housing for Individuals with Disabilities** - accessible and adapted housing for individuals with disabilities, including wheelchair-accessible units and sensory-adapted accommodations.

21.B Context for Sutton

- 21.5** The context for delivering older persons, supported, and specialist accommodation in Sutton has changed since the current policy (Policy 11) of the Adopted Local Plan (2018) was produced.
- 21.6** As noted, the NPPF provides a new emphasis on meeting need, and the new London Plan (2021) includes specific policies on supported and specialist housing (Policy H12), and specialist older persons housing (Policy H13).

21.7 Policy H12 includes reference to supporting disabled Londoners, recognising London’s diversity, and is clear that boroughs should undertake assessments of the need in the short-term, medium-term, and for permanent supported and specialised accommodation. Policy H13 sets out an annual benchmark for specialist older persons housing provision for each borough across London. The benchmark figure for Sutton is set at 100 units per annum for the period between 2017 and 2029.

21.8 The Strategic Housing Market and Local Housing Need Assessment (LHNA) provides the evidence base on these key issues and allows the Council to draft an up-to-date policy approach. Key findings from the assessment are set out below.

Older Persons and those with a Disability

21.9 A range of data sources and statistics have been accessed to consider the characteristics and housing needs of the older persons population and the population with some form of disability. The two groups are taken together as there is a clear link between age and disability. Table 21.1 below shows that Sutton has an older age structure than the London average, with 15% of the population being aged 65 or over, but a younger age structure when compared with the equivalent data for England.

Table 21.1: Older Persons Age Structure, 2021

Age	Sutton	London	England
Under 65	84.8%	88.1%	81.6%
65-74	8.1%	6.5%	9.8%
75-84	4.9%	3.8%	6.1%
85+	2.2%	1.6%	2.4%
Total 65+	15.2%	11.9%	18.4%
Total 75+	7.1%	5.3%	8.6%

Source: Census 2021

21.10 Components of population change have been modelled to develop a demographic projection through to 2032. The data draws upon the 2021 Census. The analysis shows population is projected to increase by 13,519 people – this is a 6.4% increase over the 10-year period. In overall terms, the population aged 16-64 is projected to grow the most, but those aged 65+ is projected to see the highest proportionate increase (22.2%).

Table 21.2: Change in Age Structure 2022 to 2032

Age Group	2022	2032	Change	% Change
Under 16	44,420	43,379	-1,042	-2.3%
16-64	135,214	142,534	7,321	5.4%
65+	32,604	39,843	7,239	22.2%
Total	212,237	225,756	13,519	6.4%

Source: Demographic projections, LHNA (2022)

Other Health Issues and Disability

21.11 Table 21.3 shows the proportion of people with a long-term health problem or disability (LTHPD) drawn from 2011 Census data. The data suggests that over 27% of households in Sutton contain someone with a LTHPD. This figure is very similar to the London-average, but some way below the national average. The data also shows that over 14% of the total population in Sutton has a LTHPD, also similar to the London-average, and below the national average. These findings are interesting given the older population structure in the borough when compared with London as a whole, and the fact that older people are typically more likely to have some form of health problem or disability.

Table 21.3: Households containing a Health Problem

Location	Households containing someone with a Health Problem		Population with a Health Problem	
	No.	%	No.	%
Sutton	21,425	27.4%	27,189	14.3%
London	910,432	27.9%	1,157,165	14.2%
England	7,217,905	32.7%	9,32,586	17.6%

Source: Census 2011

21.12 Data from the 2021 Census shows that 5.8% (12,205) of the population in Sutton consider themselves disabled under the Equality Act, with day-to-day activities highly limited. There are 8.9% (17,409) of the population in Sutton who consider themselves disabled under the Equality Act with day-to-day activities limited a little. 6.3% (13,304) consider themselves not disabled under the Equality Act, but have long term physical or mental health conditions, where day-to-day activities are not limited.

21.13 Approximately, 21.9% (18,070) of households in Sutton consider that there is one person who is disabled in the household, with approximately 5.8% (4,736) considering that there are two persons who are disabled within the household. In total, 27.7% (22,806) households contain someone who is disabled.

21.14 Analysis of forecast health-related data draws on prevalence rates from the Projecting Adult Needs and Service Information (PANSI)¹² and Projecting Older People Population Information (POPPI) websites¹³.

21.15 Table 21.4 below shows the forecast changes through to 2032. There are noticeable increases in the number of older people with dementia (increasing by 19 %) and mobility problems (increasing by 20%). When related back to the total projected change in the population, the increase of people aged 65+ with a mobility problem represents 10% of total projected population growth.

Table 21.4: Changes in Households containing a Health Problem 2022 to 2032

Disability	Age Range	2022	2032	Change	% Change
Dementia	65+	2,107	2,509	402	19.1%
Mobility Problems	65+	5,551	6,663	1,112	20.0%
Autistic Spectrum Disorders	18-64	1,034	1,081	47	4.6%
	65+	271	336	65	24.1%
Learning Disabilities	18-64	2,754	2,875	121	4.4%
	65+	622	753	131	21.1%
Challenging Behaviour	15-64	51	53	2	4.5%
Impaired Mobility	16-64	5,835	6,232	397	6.8%

Source: POPPI/PANSI and Demographic Projections

21.16 Invariably, there will be a combination of those with disabilities and long-term health problems that continue to live at home with family, those who chose to live independently with the possibility of incorporating adaptations into their homes, and those who choose to move into supported housing.

21.17 Overall, the analysis suggests that there will be a notable need for housing with support (in the market sector) and housing with care (again mainly for market housing). The analysis also suggests a need for some additional nursing and residential care bedspaces (although the analysis suggests a surplus of nursing care bedspaces currently).

Specialist Accommodation, including Wheelchair Users

21.18 Tables 21.5 to 21.7 show an analysis of the number of current and future wheelchair users, and an estimate of the number of wheelchair accessible/adaptable dwellings that might be required in the future (up to 2032).

¹² Projecting Adult Needs and Service Information (PANSI): [PANSI](#)

¹³ Projecting Older People Population Information (POPPI): [POPPI](#)

Table 21.5: Age Groups with day to day activities limited

Age Group	% of age group with day to day activities limited a lot		Sutton as % of England	Prevalence rate (per 1,000 Population)
	Sutton	England		
Under 60 Years	3.1%	4.2%	73.7%	3
60-74 years	10.3%	13.9%	74.2%	20
75-84 years	24.4%	29.1%	84.0%	57
85 years or over	49.5%	52.3%	94.5%	138

Source: Census 2011

Table 21.6: Current and Future Need for Wheelchair Accessible Homes

Location	Current Need	Projected Need (2022-32)	Total Current and Future Need	Housing Need (2022-32)	% of Housing Need
Sutton	555	366	921	8,860	10.4%

Source: Census 2011

Table 21.7: Estimated Need for Wheelchair User Homes by Tenure

Location	Market	Affordable
Sutton	8%	21%

Source: Derived from Demographic Projections and EHS Prevalence Rates

Current Supply of Communal and Specialist Accommodation

21.19 Sutton has a high number of residential and nursing care homes in the borough. The Council believes it has an oversupply to meet its own needs, and that the supply/demand figures are affected due to importing older people from neighbouring Croydon, Merton, Kingston and Surrey. Typically the catalyst for a move to Sutton is the cost, availability and choice of premises. In around 50% of cases the residents are self-funders.

21.20 The Council has around 160 units of affordable extra care and within that there are only approximately eight vacancies (at the time of the of the LHNA) the Council expects that the demand for market accommodation will remain high as many self-funders go straight to residential care. Although it is also noted the lack of market extra-care is potentially increasing demand for residential. The Council understands this is putting pressure on the availability of residential care for those that need it.

21.21 The number of residential care homes in Sutton are shown in Table 21.8 below.

Table 21.8: Carehome and Supported Units

Indicator	2019	2020	2021	2022 (January)	2023 (January)	Change 2022 to 2023
Number of residential care homes	83	80 (3 outstanding; 64 good; 7 require improvement; 2 inadequate)	77 (3 outstanding; 61 good; 9 require improvement; 3 unrated)	74 (3 outstanding; 62 good; 9 require improvement)	75 (3 outstanding; 65 good; 5 require improvement; 2 inadequate)	+1 Carehome
Total Bed Spaces	1,488	1,466	1,394	1,229	1,249	+20 beds

Source: Care Quality Commission (January 2022)

Summary

21.22 In summary, looking at the period 2022 to 2032, the analysis shows:

- A 22.2% increase in the population aged 65+ (potentially accounting for 61% of total population growth);
- A 19% increase in the number of people aged 65+ with dementia and a 20% increase in those aged 65+ with mobility problems;
- 27.4% of households contain someone with a long-term health problem or disability, including 3.5% under 15 years old and 7.3% of those aged 16 to 49.
- A need for around 330 housing units with support (sheltered/retirement housing) in the market sector, but a surplus of affordable housing;
- A need for around 390 additional housing units with care (e.g. extra-care) – the majority (over 80%) in the market sector;
- A need for additional residential and nursing care bedspaces (around 520 over the period); and
- a need for over 900 dwellings to be for wheelchair users (meeting technical standard M4(3)).

Older Persons Need in Detail

21.23 The projected change in the number and proportion of older persons, and those with disabilities, provides clear evidence justifying a change in the Council's policy approach.

21.24 The older person population has some distinct characteristics, including a high representation in the owner-occupied sector and this is projected to increase notably in the future. An ageing population means that the number of people with disabilities is likely to increase substantially.

21.25 Nationally, there has been a clear focus on strengthening a community-led approach and reducing reliance on residential and nursing care – in particular focussing where possible on providing households with care in their own home. This could however be provision of care within general needs housing; but also care which is provided in a housing with care development, such as in extra care housing.

21.26 The Council is mindful that Sutton is an Outer London borough, is primarily suburban in character, and has areas that have only limited access to public transport services. The Council considers that provision of older persons accommodation and specialist accommodation needs to be in highly accessible locations to aid independent living and provide for a high quality of life. As such, the Council would expect that older persons and specialist accommodation is provided in locations that have a minimum PTAL rating of '3' as defined by Transport for London's Webcat tool.

21.27 Below shows the different types of older persons accommodation that may come forward within Sutton.

Definitions of Different Types of Older Persons' Accommodation

Age-restricted general market housing: This type of housing is generally for people aged 55 and over and the active elderly. It may include some shared amenities such as communal gardens, but does not include support or care services.

Retirement Living or sheltered housing (housing with support): This usually consists of purpose-built flats or bungalows with limited communal facilities such as a lounge, laundry room and guest room. It does not generally provide care services, but provides some support to enable residents to live independently. This can include 24-hour on-site assistance (alarm) and a warden or house manager.

Extra care housing or housing-with-care (housing with care): This usually consists of purpose-built or adapted flats or bungalows with a medium to high level of care available if required, through on-site care agencies registered through the Care Quality Commission (CQC). Residents are able to live independently with 24-hour access to support services and staff, and meals are also available. There are often extensive communal areas, such as space to socialise or a wellbeing centre. In some cases, these developments are known as retirement communities or villages - the intention is for residents to benefit from varying levels of care as time progresses.

Residential care homes and nursing homes (care bedspaces): These have individual rooms within a residential building and provide a high level of care meeting all activities of daily living. They do not usually include support services for independent living. This type of housing can also include dementia care homes.

21.28 To reiterate, based on the data and analysis, the Council is expecting a notable need for housing with support (in the market sector) and housing with care (again mainly for market housing). The analysis also suggests a need for some additional nursing and residential care bedspaces (although the analysis suggests a surplus of nursing care bedspaces currently).

Table 21.8: Supply and Demand for Older Persons, Specialist and Supported Accommodation

Housing Type	Housing Demand per 1,000 75+	Current Supply	Current Demand	Current Shortfall/ Surplus (-ve)	Additional Demand to 2032	Shortfall/ Surplus by 2032
Housing with Support						
Market	60	807	918	111	222	333
Affordable	54	1,279	828	-451	200	-250
Total	115	2,086	1,746	-340	422	82
Housing with Care						
Market	28	137	429	292	104	395
Affordable	13	156	200	44	48	92
Total	41	293	629	336	152	488
Care Bedspaces						
Residential Care Bedspaces	37	242	559	317	135	452
Nursing Care Bedspaces	41	708	629	-79	152	73
Total Bedspaces (GROSS)	78	950	1,187	237	287	525

Source: LHNA (2022)

- 21.29** Table 21.8 shows the total additional need for older persons accommodation over the period 2022 - 2032. This is broken down into those needing “housing with support” **(422)**, those needing “housing with care” **(152)**, and those needing other specialist bedspaces, which are “residential care bedspaces” and “nursing care bedspaces” **(287)**.
- 21.30** The table also shows that by 2032 there will be an estimated shortfall of “homes with support” **(82)**, “homes with care” **(488)**, and “residential care bedspaces” / “nursing care bedspaces” **(525)**.
- 21.31** In total, the older person's analysis therefore points towards a need for around **861 units** over the 2022-32 period (86 per annum) – this figure is slightly lower than the indicative figure suggested in the London Plan (100 per annum, see paragraph 21.7 above).
- 21.32** It should be noted that these figures are the newly generated need, resulting from population growth and the changing demographic profile in the borough (i.e. those

requiring different accommodation as they age or experience disability). The newly arising need must also be considered alongside existing demand and existing provision of accommodation and bedspaces. The Council will continue to monitor the demographic changes and its impact on need through the Council's Market Position Statement¹⁴. The following sections explore these issues for each tenure type.

Housing with Support

21.33 The additional demand figure for those needing housing with support is 422. When this figure is related to existing supply, the data shows that there is a total residual need for 82 additional homes with support. However, this figure conceals a considerable imbalance between the number of homes with support that will need to be delivered by the market, compared to those that will need to be delivered by the affordable housing sector.

21.34 The data for the market sector shows that there is already an existing shortfall in provision (111 units), and that the residual overall need for housing with support in the market sector is 333 units. This is a significant figure, and the Council will need to understand how this can be achieved, whilst also managing potential concentrations of age-restricted housing and retirement living to ensure there are no negative consequences such as social isolation and lack of accessibility.

21.35 This situation is contrasted with the existing supply in the affordable sector, where the data shows an existing oversupply (451 units). This results in a residual negative need figure of -250 units (i.e. a continued oversupply). The Council will need to carefully consider how to manage this oversupply whilst still maintaining quality of housing with support across the borough.

Housing with Care

21.36 The additional demand figure for those needing housing with care is 152 units. When this is related to existing supply, there is a total residual need for 488 additional homes with care. This stems from the fact that there is already an existing shortfall in provision across both the market and affordable sectors.

21.37 The data for the market sector shows an existing shortfall (292 units), and that the residual overall need for housing with care in the market sector is 395 units. Again, this is a significant figure, and the Council will need to consider how and where these homes, which can require medium to high levels of care, are best delivered in the borough. The data for the affordable sector shows that there is an existing shortfall (44 units), and that the residual overall need for housing with care in the affordable sector is 92.

Residential Care

21.38 The additional demand figure for those needing residential care is 135 bedspaces, There is an existing shortfall of 317 bedspaces, resulting in a total demand for 452 bedspaces through to 2032. Using the typical conversion rate for translating bedspaces to dwellings (1.80) this would therefore equate to around 251 dwellings required for residential care.

¹⁴ <https://data.sutton.gov.uk/sutton-market-position-statement/>

Nursing Care

21.39 The additional demand figure for those needing nursing is 152 bedspaces. There is an existing surplus of 79 bedspaces, resulting in a total demand for 73 bedspaces through to 2032. Using the typical conversion rate for translating bedspaces to dwellings (1.80) this would therefore equate to around 41 dwellings required for nursing care.

Accessible and Adaptable Dwellings / Wheelchair User Dwellings

21.40 In addition, the data suggests that there is a clear need to increase the supply of accessible and adaptable dwellings and wheelchair user dwellings as well as providing specific provision of older persons housing. The Council has acknowledged that the percentage of properties suitable for those with a disability is too low. They have identified a need for fully accessible homes of the right size and for older persons housing.

21.41 The evidence suggests that the Council could consider (as a start point) requiring all dwellings (in all tenures) to meet the M4(2) standards (which are similar to the Lifetime Homes Standards) and around 10% of homes meeting M4(3) – wheelchair user dwellings (a higher proportion in the affordable sector).

21.42 Where the authority has nomination rights, M4(3) would be wheelchair user dwellings (constructed for immediate occupation) and in the market sector they should be wheelchair user adaptable dwellings (constructed to be adjustable for occupation by a wheelchair user).

21.43 It should however be noted that there will be cases where this may not be possible (e.g. due to viability or site-specific circumstances) and so any policy should be applied flexibly.

21.44 In seeking M4(2) compliant homes, the Council is mindful that such homes could be considered as ‘homes for life’ and would be suitable for any occupant, regardless of whether or not they have a disability at the time of initial occupation.

21.45 Based upon the evidence, the Council considers that there are different policy principles/options to explore as part of the Regulation 18 consultation, these are set out below:

- Proposals for the development of older persons, specialist, and supported housing will be supported where it:
 - meets an identified need, having regard to the evidence set out in the Council’s most up-to-date Local Housing Needs Assessment;
 - will be of a high quality design, including the creation of dementia-friendly spaces, and will be in accordance with relevant London Plan policies and the final version of Sutton Local Plan policies relating to housing size and standards (subject to viability);
 - delivers a percentage of all dwellings built to the ‘wheelchair accessible’ standard Part M4(3), and the remainder to be built to standard Parts M4(2) of the Building Regulations (subject to viability).

- has access to good levels of public transport, and to shops, services and leisure facilities appropriate to the needs of the intended occupiers; and
 - delivers affordable housing, in accordance with London Plan policies H4 and H5, and the final version of Sutton Local Plan policies relating to affordable housing (including reference to the requirements for on-site and off-site provision).
- Existing specialist and supported housing will be protected where it is considered suitable for its use and meets relevant quality standards.
 - Redevelopment of any existing site that includes specialist and supported housing will only be considered acceptable where:
 - there is no longer an identified need for its retention in its current format;
 - any loss of accommodation is re-provided elsewhere in the borough, resulting in no net loss; and
 - new accommodation meets the criteria and requirements set out above.
 - Specific sites will be allocated for older persons, specialist, and supported housing, and these will be identified in accordance with the criteria and requirements set out in the rest of the policy.

Towards a Policy Approach

21.44 Based upon the evidence and analysis, the Council considers that it can move directly towards a draft policy approach for consideration as part of this Regulation 18 consultation. The draft policy is as follows:

21.C Draft Policy 21 on Older Persons and Specialist Accommodation

- (a) Proposals for the development of older persons, specialist, and supported housing will only be supported where:
- (i) accommodation meets an identified need, that is not provided by other existing care homes in the borough, having regard to the latest evidence on local need and the Council's Authority Monitoring Report;
 - (ii) accommodation is of high quality design, including the creation of dementia-friendly spaces, and will be in accordance with policies D4, D5, D7, and H12 of the London Plan; and the final version of Local Plan Review policies relating to housing size and standards (subject to viability);
 - (iii) at least 10% of dwellings will be built to the 'wheelchair accessible' standard Part M4(3), and the remainder to be built to standard Part M4(2) of the Building Regulations (subject to viability);
 - (iv) accommodation has good access to public transport, shops, services, and leisure facilities appropriate to the needs of the intended occupiers. Accommodation should be located on a site with a minimum PTAL rating of '3';
 - (v) affordable housing is provided in accordance with London Plan policies H4 and H5, and the final version of Local Plan Review policies relating to affordable housing (including reference to the requirements for on-site and off-site provision).

- (b) Existing specialist and supported housing will be protected where it is considered suitable for its use and meets relevant quality standards.
- (c) Redevelopment of any existing site that includes specialist and supported housing will only be considered acceptable where:
 - (i) there is no longer an identified need for its retention in its current format;
 - (ii) any loss of accommodation is re-provided elsewhere in the borough, resulting in no net loss; and
 - (iii) new accommodation meets the criteria set out in Part (a) above.
- (d) Net non-self-contained accommodation for older people (C2 Use Class) will count towards meeting housing targets on the basis of a 1:1 ratio, with each bedroom being counted as a single home.

21.D Regulation 18 Consultation Questions



- A. Do you agree with the policy principles on older persons, specialist and supported housing, as set out by the Council?
- B. Do you agree with the draft policy on older persons, specialist and supported housing, as set out by the Council?
- C. Do you agree that the Council should require 10% of all new dwellings to be compliant with Part M4(3) of the Buildings Regulations in order to meet the 'wheelchair accessible' standard?
- D. Do you agree that older persons, specialist and supported housing should provide affordable housing (subject to viability)?
- E. Do you agree that the Council should identify specific sites that will deliver specialist and supported accommodation, and allocate these in the Local Plan Review?
- F. If you do not support the policy principles or the draft policy, please give reasons and where possible suggest alternatives.

Issue 22 - Gypsy and Traveller Accommodation

22.A Introduction

- 22.1** Gypsies and Travellers are a distinct group of residents with special requirements as a result of their culture. Some prefer to live on a Gypsy and Traveller pitch which usually consists of a permanent chalet or static caravan, a caravan for travelling and separate utility block for washing and/or cooking. Over the years, their nomadic tradition has declined and many Gypsies and Travellers remain on their home or permanent sites for ten or eleven months of the year. Some Gypsies and Travellers spend more time on the road but this is usually in the summer months and the reasons for travelling are usually work or to visit extended family.
- 22.2** The definition of Gypsies and Travellers for planning purposes has changed several times over the last decade. In August 2015, the Government published a new definition so that only those people with a 'nomadic habit of life' or who have temporarily ceased this life could be classified as Gypsies and Travellers. This meant that many Gypsies and Travellers who live on permanent sites may not have been classed as Gypsies and Travellers if they didn't travel enough.
- 22.3** In December 2023, the Government updated the 'Planning Policy for Traveller Sites' (PPTS) advice note to confirm that the wider definition of Gypsies and Travellers, to include those that have ceased travelling permanently, should be used, in light of the judgement in the Court of Appeal in the case of Smith v Secretary of State for Levelling Up, Housing & Communities and Others.
- 22.4** Notwithstanding the planning definition, the Council considers that, under the 2004 Housing Act and 2010 Equalities Act, the accommodation needs of all Gypsies and Travellers even if they have ceased travelling, should be taken into account.

22.B Context for Sutton

Existing Sites

- 22.5** Sutton has two Gypsy and Traveller sites, both on Carshalton Road near Woodmansterne and the Council will continue to safeguard the sites. One site is privately owned and is occupied by Irish Travellers and the other is a Council site which is occupied by both English Gypsies and Irish Travellers.
- 22.6** In 2023, Council site was granted planning permission for comprehensive redevelopment to provide 23 pitches (8 net additional) and substantially improve the overall sites. The scheme is expected to complete in 2025-26.
- 22.7** As part of the Plan preparation the Council carried out a Call for Sites exercise, which included a request for Gypsy and Traveller sites. However, no submissions were made for new sites in Sutton.

Estimate of Need

22.8 In 2023, the GLA commissioned a detailed London-wide Gypsy and Traveller Accommodation Needs Assessment (GTANA) to provide information for boroughs to use to inform local plan preparation and, specifically, to plan to meet the accommodation needs of the Gypsy, Roma, Traveller and Travelling Showpeople (GRTTS) communities, in line with London Plan Policy H14, Gypsy and Traveller accommodation. This covers the period 2022-23 to 2031-32.

22.9 The main objective of the London-wide GTANA is to provide a robust and reliable evidence base for use in policy development in housing and planning. It assesses the need, across London and broken down by borough, for:

- bricks and mortar homes for members of the Roma community and Gypsies and Travellers;
- the number of additional pitches needed for Gypsies and Travellers (including Roma); and
- additional plots for Travelling Showpeople.

22.10 The need for additional provision identified by the study is set out in Table 22.1 below. This is broken down into: (a) Cultural definition (Gypsies and Travellers that have ceased travelling permanently); and (b) the Planning Policy for Traveller Sites (PPTS) definition 2015 (which excludes Travellers that have ceased travelling permanently). However, it should be noted that the cultural definition also includes those that meet the PPTS definition, so the two figures should not be aggregated.

Table 22.1: Gypsy and Traveller Pitch Need

Type of Need	2022-23 to 2026-27	2027-28 to 2031-32	Total
Cultural Definition	9	6	15
PPTS Definition (2015)	8	6	14

22.11 The GTANA study has also considered the need for bricks and mortar homes (not including those gypsies and travellers who are currently living in bricks and mortar accommodation but have a cultural preference for a traditional pitch, which is covered in Table 22.1). The Council considers that the need for bricks and mortar accommodation can be accommodated through the general provision of new housing in Sutton, which is addressed in other parts of this document.

Table 22.2: Bricks and Mortar Need

Type of Need	2022-23 to 2026-27	2027-28 to 2031-32	Total
Roma	45	18	62
Gypsies and Travellers	8	5	13
Total	53	23	75

22.12 The GTANA identified no need for Travelling showpeople or transit sites.

22.13 In addition to allocating new Gypsy and Traveller sites, it is still necessary to have a policy on Gypsy and Traveller sites should an application for such a use arise.

Towards a Policy Approach

22.14 Based upon the evidence and analysis, the Council considers that it can move directly towards a draft policy approach for consideration as part of this Regulation 18 consultation. The draft policy is as follows:

22.C Draft Policy 22 on Gypsy and Traveller Accommodation

- (a) The Council will safeguard the two existing Gypsy and Traveller sites, The Pastures and Grove Place, Carshalton Road, Woodmansterne, for Gypsy and Traveller accommodation.
- (b) The Council is considering additional Gypsy and Traveller accommodation, as set out in the Potential Sites Allocations.
- (c) Planning permission for further Gypsy and Traveller sites will only be permitted when a site satisfies the following criteria:
 - (i) The site has safe access to and from the road network, and it has adequate provision for parking, turning, servicing and emergency vehicle access.
 - (ii) The application will not have an unduly adverse impact on the local environment, the character of the area and the amenities of both local residents and the future occupiers of the site, including the potential for noise pollution, air pollution or traffic movements and other activities likely to be taking place within or in the vicinity of the site.
 - (iii) The site is situated within a reasonable distance of local shops, services and community facilities, in particular schools and health services, and is accessible by public transport.
 - (iv) The site is not located in an area at high risk of flooding.
 - (v) The layout of the site, its associated facilities and landscaping will be designed to a high standard including pitches, hardstandings, amenity blocks, amenity and play spaces and boundary treatments.

22.D Regulation 18 Consultation Questions



- A. Do you agree with the Council's position on the need for new Gypsy and Traveller sites? Please give reasons, if possible.
- B. Do you agree with the draft policy on Gypsy and Traveller Accommodation? Please give reasons, if possible.

Issue 23 - Housing and Garden Land

23.A Introduction

- 23.1** Back gardens make an important contribution to the quality of life of residents, both in terms of their amenity and recreational value and outlook, their ecological function and their contribution towards the suburban character of the borough. Since the largest proportion of residential gardens in the borough consists of soft landscaping with lawns, mature trees and shrubs and flower beds, they have important environmental benefits. Similarly, public, communal or semi-private amenity green spaces make important contributions to quality of life and the environment. Many gardens and communal amenity green spaces in the borough combine with adjacent gardens to form green corridors. As such, proposals that develop these spaces could lead to an unacceptable loss of amenity for the residents and biodiversity, and damage to the character of the borough.
- 23.2** This importance is recognised at a national level, where garden land is specifically excluded from the definition of previously developed land. Furthermore, the NPPF (Paragraph 72) allows local authorities to introduce policies to protect back garden land, stating “*Plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area*”.

23.B Context for Sutton

Back Garden Land

- 23.3** Historically, large parts of the borough have been laid out in rectangular street blocks with housing fronting onto roads enclosing large rear gardens. Many areas of back garden land have matured and developed as important amenity areas for residents that also contribute to the overall character and appearance of the borough. Back gardens also contribute to the biodiversity of the borough, provide safe and secure play space, have physical and mental health benefits and mitigate against the effects of climate change. Furthermore, in certain wards which are deficient in access to public open space, private back gardens are an important substitute.
- 23.4** However, in recent years, back garden land in Sutton has come under increasing pressure for new housing development and the cumulative impact of back garden loss is causing gradual degradation of the open and green character of the borough as well as impacting negatively on biodiversity.
- 23.5** The Adopted Local Plan includes a policy to protect certain back garden land. Local residents are also strongly supportive of a policy as they consider garden land contributes to the local distinctiveness of the borough. Therefore, the Council considers it appropriate to maintain its existing policy against inappropriate back garden land development.

Front Garden Land

23.6 Front gardens provide similar benefits to back gardens in terms of making a positive contribution to the character and appearance of an area, providing ecological value, providing play space and mitigating against climate change. However, the Council is limited in its powers to control the loss of front gardens. If a front garden is paved with a permeable material, no planning permission is required, and, if a front garden is paved with a non-porous material, the paved area needs to be greater than 5m² before a planning permission is required. Therefore, the Council can merely advise and guide on the retention of front gardens.

Artificial Grass in Garden Land

23.7 In addition to built development in back gardens and the replacement of front gardens with paving, the installation of artificial grass, which has become increasingly popular in recent years, is hugely negative; it reduces biodiversity, it contributes to the urban heat island effect, it increases the risk of flooding by reducing ground permeability and is typically made of plastics that cannot be recycled. Whilst planning permission is not required for the replacement of natural grass with artificial turf, which limits the ability of the Local Plan to control it, the Council consider the issue to be important enough to include guidance and discouragement for its use, particularly if it is proposed in new development.

Towards a Policy Approach

23.8 Based upon the evidence and analysis, the Council considers that it can move directly towards a draft policy approach for consideration as part of this Regulation 18 consultation. The draft policy is as follows:

23.C Draft Policy 23 on Houses and Garden Land

Back Garden Land

- (a) The Council will not grant planning permission for the development of back garden land where the site, either individually or as part of a larger street block:
 - (i) Makes an important contribution to the character and appearance of the surrounding area.
 - (ii) Is considered to be of local ecological value by the Council
 - (iii) Is likely to make a significant contribution to minimising the risk of flooding in Flood Zones 2 and above or in a critical drainage area.
 - (iv) Where the development of the site would adversely affect the amenity of future occupiers or those currently occupying adjoining or nearby properties.

Front Garden Land

- (b) The Council will seek the retention of established boundary treatments, such as front garden walls, to maintain the suburban character and appearance of the borough.
- (c) Where the paving of all or part of a front garden is sought:
 - (v) A permeable or porous material (including for the sub-base layer) should be used.

- (vi) The maximum amount possible of soft landscaping and/or vegetation should be retained or created.

Artificial Grass in Garden Land

- (d) The Council will seek the retention of natural lawns/grass in residential gardens to maintain the biodiversity value, climate change mitigation benefits and to reduce flood risk.
- (e) Development proposals that include private residential gardens and/or communal amenity spaces will be not supported where artificial lawns/grass are proposed.

23.D Regulation 18 Consultation Questions



- A. Do you agree with the draft policy on houses and garden land? Please give reasons, if possible.
- B. Do you agree the Council should seek to restrict the use of artificial lawns?
- C. If you do not support the provisions of the draft policy, please give reasons and where possible suggest alternatives.

Issue 24 - Employment Land and Waste Management

24.A Introduction

- 24.1** The Government's overarching economic objective for the planning system is to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity.
- 24.2** Paragraph 20 of the NPPF (2023) expects the strategic policies in a local plan to set out an overall strategy for the pattern, scale and design quality of places and make sufficient provision for employment and other commercial development. In respect of meeting needs, a local plan should be positively prepared – meeting as a minimum the assessed needs, which includes the need for employment and industrial land.
- 24.3** The NPPF goes on to state that planning policies should set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration. Furthermore, local plans should set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period.
- 24.4** The London Plan (2021) requires boroughs to plan for sufficient employment and industrial space in the right locations to support economic development and regeneration. London Plan Policy E4 aims to provide and maintain a sufficient supply of land and premises to meet current and future demands for industrial, logistics and related functions, taking account of strategic and local employment land reviews and the potential for intensification, co-location (employment and residential/other uses) and substitution.
- 24.5** The policy states that retention, enhancement and provision of additional industrial capacity should be prioritised in locations that are accessible to the strategic road network and/or potential for transport by rail/water, provide capacity for logistics, waste management and emerging sectors that support London's economy and population. The very firm policy steer from the GLA is for boroughs to deliver intensified industrial floorspace wherever possible.
- 24.6** Policy E7 states that Development Plans should be proactive and encourage the intensification of business uses in Use Classes B1c (now Class E(g)ii and E(g)iii), B2 and B8 occupying all categories of industrial land. The policy goes on to state that mixed-use or residential development proposals on non-designated industrial sites should only be supported where there is no reasonable prospect of the site being used for industrial and related purposes, or where it has been allocated in development plans or where industrial, storage or distribution floorspace is provided as part of the mixed-use intensification. Development plans should, in collaboration with the GLA and neighbouring authorities, also consider the scope to

facilitate the substitution of some of London’s industrial capacity to related property markets outside of London.

24.7 However, it is noted that the GLA have confirmed in a number of recent local plan examinations that ‘co-location’ is not acceptable in Strategic Industrial Locations (SIL). A co-location strategy risks losing industrial capacity that would, through an intensification route, deliver more floorspace. As a limited commodity; that is very hard to replace, boroughs need to work to maximise the SIL asset for SIL uses.

24.B Context for Sutton

Employment Land Need

24.8 Sutton’s existing industrial areas fall into two categories; (a) Strategic Industrial Locations; and (b) Established Industrial Locations, as set out in Table 24.1 below.

Table 24.1: Existing Strategic and Established Industrial Locations in Sutton

Industrial Estate	Size in Hectares
Strategic Industrial Locations (SILs)	
Beddington SIL	111.0 ha
Kimpton SIL	18.5 ha
Imperial Way SIL	5.9 ha
Total	135.4 ha
Established Industrial Locations (EILs)	
Croydon Road EIL	3.86 ha
Restmor Way EIL	3.6 ha
Hackbridge Industrial Area EIL	1.57 ha
Plumpton Way Trading Estate and Gas Holder EIL	1.11 ha
Gander Green Lane and Abbotts Road EIL	0.74 ha
Oldfields Road EIL	0.61 ha
Wandle Valley Trading Estate EIL	0.51 ha
Total	12.0 ha

Source: Sutton Local Plan 2018

24.9 In support of the Local Plan Review, the Council commissioned a new ‘Employment Land and Economic Needs Assessment’ (ELENA) 2023 to provide the evidence base to assist in the preparation of new economic policies and land allocations to support economic growth and the provision of jobs and guide employment provision. One important caveat to this study is that it is being prepared in the wake of the Covid pandemic as well as the uncertainty over the long term impacts of Brexit. These

factors are affecting how businesses operate, and manifesting in ways such as firms seeking to build-in supply chain resilience (requiring more floorspace in the UK) and more broadly changes in working habits that are affecting the way employment space is used (particularly office space), and the levels of overall economic demand.

24.10 The borough's industrial market has strengthened considerably over the past decade, with tightening supply, increasing demand, very low vacancy rates (below 2% in 2023) and increasing rents. In terms of future need over the Plan period, a past trends projection-based approach identifies a need for 100,000 sq.m. of space, but this projects a land opportunity constrained view. The economic forecast generates a 200,000 sq.m. need, reducing to a 167,000 sq.m. requirement once committed supply is taken into account. Expansion in the number of warehouse related jobs is forecast, but it is growth in industrial jobs that is driving the higher identified need figure. The study suggests the more optimistic approach is the most appropriate as this ties in with key indicators such as the current vacancy rate that is so low, and the post-Covid 'normal' that generates more logistics and warehousing need than previous.

24.11 The calculated need for Industrial floorspace in Sutton for the period 2022 to 2042 is set out in Table 24.2 below.

Table 24.2: LB Sutton Industrial Need 2022 to 2042

Variable	Total Industrial Requirement	Per Annum
Net Demand (sq.m. GIA)	204,275 sq.m.	10,214 sq.m.
Net Demand (hectare) [@65% plot ratio]	31.4 ha	1.6 ha
Gross Demand (sq.m. GIA)	205,649 sq.m.	-
Total Supply (sq.m. GIA)	38,885 sq.m.	-
Under Supply (sq.m. GIA)	166,764 sq.m.	8,338 sq.m.
Under Supply (ha) [@65% plot ratio]	25.7 ha	1.3 ha

Source: Employment Land and Economic Needs Assessment, 2023

24.12 Table 24.2 concludes that Sutton should plan to provide 166,784 sq.m. of industrial floorspace, including warehousing, to 2042 to meet the demand. This is significantly greater than the need that was planned for in the Local Plan (2018) of 40,000 sq.m., which could only be met in full through the release of Metropolitan Open Land (MOL) adjacent to the Beddington SIL. It also represents an increase in around a third of the borough's current industrial floorspace.

Options for Meeting Industrial Need

24.13 Meeting this new need figure in full will be extremely challenging. The scope for new land for employment use is very restricted because of the intense competition for land from many uses and the constraints on development opportunities such as Green Belt, Metropolitan Open Land (MOL) and proximity to sensitive receptors. However, options for meeting this need are explored below.

Intensification of Existing Industrial Land

24.14 The first option to consider is intensification of existing industrial areas to deliver the required uplift in industrial floorspace. This approach is consistent with the London Plan, which advocates intensification and the more efficient use of industrial land in Policy E5 to E7. Specifically, development plans and development proposals should be proactive and encourage the intensification of business uses in Use Classes E(g)ii and E(g)iii, B2 and B8 occupying all categories of industrial land through the:

- introduction of small units;
- development of multi-storey schemes;
- addition of basements; and
- more efficient use of land through higher plot ratios.

24.15 The Adopted Local Plan supports intensification and the first option to consider is to continue with this approach to help meet Industrial needs. The Adopted Local Plan demonstrated the need based on lower plots ratios of 40%. The ELENA considers that a plot ratio of 65% is appropriate for Sutton (and also considers plot ratios of 100% but concludes that this is neither realistic nor would it not meet market requirements). Increasing plot ratios to 65%, taking into account operational yard space requirements, servicing and mitigating impacts on the transport network, could help the Council make more efficient use of existing industrial land by delivering more floorspace on existing sites.

Multi-storey Intensification

24.16 Alongside conventional intensification, the London Plan also advocates multi-storey industrial intensification and the Local Plan needs to consider this. However, while industrial rents have increased significantly in Sutton with single-storey development such as Prologis Park (Beddington Lane) becoming viable, rents have not reached the point to enable viable intensified development of multi-storey spaces. As such, there are currently no examples of schemes of this type in Sutton nor any that are planned. In fact there are currently very few examples across London as a whole. One of the reasons for this is that in many markets there is a disconnect between the type of space that can be delivered via decked development and market demand. The ELENA considers that occupiers are resistant to the shift from conventional single storey to multi-storey, and as long as there is a conventional alternative, multi-storey will struggle.

24.17 Furthermore, upper floor space is significantly more costly to deliver, especially if designed for larger and heavier industrial end users. As set out in the GLA's 2018 Industrial Intensification and Co-location Study, delivering floorspace to a heavy industrial floor loading (50kN/m²) is 83% more expensive than a light format of space (7.5kN/m²). So, intensification struggles to be a viable option for larger occupiers and those where floor loading is critical. It should also be noted that some sites in Sutton's industrial areas have a high site coverage, therefore multi-storey development may not provide a net increase in floorspace and could result in a net loss.

24.18 To encourage the market to deliver multi-storey units the Council will consider, as an option, bringing forward a policy whereby the starting position for redevelopment is multi-storey development. Under this approach, the developer would need to

demonstrate the reason why the site cannot come forward in this format, for example due to site constraints, a lack of market demand and/or because a scheme of this nature is not viable. The demand and viability of these multi-storey schemes may improve over the Plan period.

24.19 However, it is unlikely that conventional intensification of existing sites, even at a higher plot ratio, will be able to meet a need figure of 167,000sq.m.. As such, other options also need to be considered.

Designating New Industrial Land

24.20 In addition to intensification the Local Plan should also consider whether there are opportunities to designate new Strategic Industrial Land in the borough to help meet the identified need.

24.21 The ELENA identified two possible locations for new industrial supply: The Tesco adjacent to the Kimpton SIL; and two parcels of Metropolitan Open Land (MOL) adjacent to the Beddington SIL. In the case of the land at Kimpton, there is currently an application for use of part of the Tesco car park for Class B8. This application is still being assessed but the possibility of using some of this site for industrial purposes will be explored.

24.22 In the case of Beddington, two sites were submitted through the call for sites process for the de-designation of MOL adjacent to the Beddington SIL and designation for industrial uses: Land to West of Beddington Lane; and Land at Jessops Way (which also included an option for co-location).

24.23 The Council has included both these sites as potential site allocations for the purposes of the Issues and Preferred Options consultation. However, inclusion at this stage does not necessarily mean the Council agrees with the release or suggested uses, but considers it should be considered by stakeholders as a potential option for meeting industrial need.

24.24 As stated above both sites are located within MOL (although part of Site B 'Land at Jessops Way' does form part of the existing Beddington SIL), as well as the Wandle Valley Regional Park and Sites of Importance for Nature Conservation. This is discussed in Issue 32 on Green Belt and Metropolitan Open Land.

24.25 The Adopted Local Plan (2018) removed the EIL designation from the land to the north of Hackbridge Station and allocated the site for residential-led mixed use redevelopment. Whilst several pre-application have been discussed with the Council over the last 10-years the site has never been brought forward. As such, the Council will consider whether this site should be re-designated as industrial land or co-location, given the scale of the need.

Co-location

24.26 The London Plan requires consideration of co-location potential where redeveloping employment land, providing residential as part of the mix. But, while such redevelopment can provide new modern floorspace, it is unlikely to deliver net additional. A co-location strategy risks losing industrial capacity that would, through

an intensification route, deliver more floorspace. As a limited commodity; that is very hard to replace.

24.27 Co-location can also compromise the industrial space for the type of occupiers that are attracted to the borough e.g. a third party logistics (3PL) operator will require 24 hour movement of HGVs and 17.5-tonne vehicles, which is not compatible with a quality living environment. This can often result in lighter industrial uses being located in areas where the need is not strong (and could almost be accommodated in town centre locations), resulting in ‘industrial gentrification’ as opposed to intensification. Furthermore, the residential values and relatively high existing use land values (for brownfield land) are unlikely to deliver viable mixed-use development and policy contributions such as affordable housing.

24.28 Therefore, the Council does not propose to support co-location schemes across its SILs given the pressing need for new industrial floorspace, which is consistent with the London Plan approach.

Duty to Cooperate

24.29 In addition to the above, the Council will continue to discuss options for meeting industrial need with neighbouring boroughs through the Duty to Cooperate (DtC). In particular, Sutton has very strong cross-boundary links with LB Croydon on industrial issues as both the Beddington SIL and the Imperial SIL form part of larger industrial estate that are shared with Croydon.

Waste Management

24.30 Waste management is not a topic for the Local Plan Review. In 2022, the Council adopted the South London Waste Plan (SLWP), in partnership with the boroughs of Croydon, Kingston and Merton. This covers the period to 2037. However, waste management is relevant to employment land.

24.31 Unlike the previous SLWP (2012), the new SLWP (2022) identified a surplus of sufficient existing or consented sites to meet waste arisings and apportionment over the next 15 years. As such, the new SLWP introduced a restrictive approach to new waste sites coming forward so that new sites will not normally be permitted unless there are exceptional circumstances to justify it. In addition, the SLWP removed the ‘waste safeguarding’ designation from four sites in Beddington SIL, meaning they can now be used for industrial uses. It also removed the designation ‘Areas with Sites Suitable for Waste Facilities’ which covered parts of the Beddington SIL and the Kimpton SIL.

24.32 Therefore, policies relating to waste development are set out in the SLWP (2022). Safeguarded waste sites will continue to appear on the Local Plan Policies Map.

Towards a Policy Approach

24.33 Based upon the evidence and analysis, the Council has established policy options for consideration as part of this Regulation 18 consultation. These are:

24.C Draft Policy Options 24 on Employment Land & Waste Management

Table 24.3: Policy Options for Employment and Industrial Need

Industrial Option 1	Industrial Option 2	Industrial Option 3
Conventional Intensification	Multi-storey Intensification	Intensification and New Sites
<p><i>Approach:</i></p> <ul style="list-style-type: none"> • Continue to protect existing designated SIL and EILs. • Support the intensification of existing sites to provide additional industrial floorspace and make more efficient use of limited employment land. Options for preferred plot ratios are: <ul style="list-style-type: none"> - 40% (current local plan standard) - 65% (London Plan standard) - 100% ELENA consideration • Develop former waste sites that have been released from waste safeguarding for industrial uses. • Refuse applications which would result in further employment land losses. • Not supporting co-location schemes in SILs. • Continue DtC with neighbouring boroughs, particularly Croydon. 	<p><i>Approach:</i></p> <ul style="list-style-type: none"> • Continue to protect existing designated SIL and EILs. • Pro-active policy to support multi-storey intensification as a means of delivering additional industrial floorspace within existing sites. Policy approach could require developers to justify why this form of development is unsuitable and/or unviable to deliver to try and make the most efficient use of land. • Develop former waste sites that have been released from waste safeguarding for multi-storey industrial uses. • Refuse applications which would result in further employment land losses. • Not supporting co-location schemes in SILs • Continue DtC with neighbouring boroughs, particularly Croydon. 	<p><i>Approach:</i></p> <ul style="list-style-type: none"> • Continue to protect existing designated SIL and EILs. • Proactively support intensification of existing sites to help meet industrial need. • De-designate MOL at land to the west of Beddington Lane (2.04ha) and land at Jessops Way (2.09ha) and allocate for industrial uses. • Continue to explore the possibility of expanding the Kimpton SIL into the adjacent supermarket site. • Develop former waste sites that have been released from waste safeguarding for multi-storey industrial uses. • Refuse applications which would result in further employment land losses. • Not supporting co-location schemes in SILs • Continue DtC with neighbouring boroughs, particularly Croydon.
<p><i>Impacts:</i></p> <ul style="list-style-type: none"> • Ensures employment land is protected from other uses. • 40% plot ratio likely to be too conservative to meet need. • 65% plot ratio is considered to be appropriate as it is an uplift on previous 40% ratio but still allows for operational yard space • 100% plot ratio is considered unrealistic and infeasible. • Would require willing landowners and business to bring forward sites for redevelopment/reconfiguration. 	<p><i>Impacts:</i></p> <ul style="list-style-type: none"> • Ensures employment land is protected from other uses. • Possible to achieve greater increases in new floorspace compared to conventional intensification. • At the present time, multi-storey development is considered unviable in Sutton, so it may not come forward until later in the plan period. • Would require willing landowners and businesses to bring forward sites for redevelopment/ 	<p><i>Impacts:</i></p> <ul style="list-style-type: none"> • Ensures employment land is protected from other uses. • Further opportunity to help meet industrial need alongside intensification. • Would result in the loss of MOL and open space. • Would need to consider the impact on the local road network, particularly Beddington Lane. • Would require willing landowners and business to bring forward sites for redevelopment/reconfiguration.

reconfiguration.

24.D Regulation 18 Consultation Questions



- A. Which options for employment / industrial need do you support? Please give your reasons where possible.
- B. Are there any other options or any alternative strategy you would like to propose?

Issue 25 - Industrial Uses

25.A Introduction

- 25.1** In addition to a strategic policy on employment/industrial land, the plan needs to have a policy to deal with individual planning applications for industrial development. This policy will be dependent on the outcome to the consultation to Issue 24 but it is still possible to formulate a draft policy for consultation.
- 25.2** The focus on this policy area is to establish suitable uses within the boroughs industrial areas.

25.B Context for Sutton

Strategic Industrial Locations and Established Industrial Locations

- 25.3** Given the limited amount of land in industrial areas, high demand, low supply and low vacancy rates, it is imperative that the Council protects existing industrial land in the first instance. As such, the Council proposes to limit development in Strategic Industrial Locations (SILs) and Established Industrial Locations (EILs) to Class E(g)(ii), E(g)(iii), B2 and B8, with some limited exceptions discussed below.
- 25.4** The Council has a long standing policy that freestanding office buildings are not suitable uses within industrial areas and instead should be located in town centres which are more accessible locations for employees and where those employees provide all-day footfall for High Street units. It is proposed that the Council will continue this approach.
- 25.5** In terms of co-location, sites where industrial uses and residential units are delivered, the Council will not support proposals located in the borough's SILs, which is consistent with the London Plan approach. Co-location schemes in EILs may be considered acceptable, but only in instances where there is no net loss of industrial land, and preferably an increase.

Trade Counters

- 25.6** The Council is aware that the nature of industrial activities are changing and many businesses now include an element of direct sales to "the trade", through the form of trade counters. Such uses are likely to be considered appropriate where products are sold to trade only. However, the Council is concerned that a number of trade counters de facto sell to the general public as well.
- 25.7** The Council does not wish the borough's industrial estates to include out-of-town shopping outlets, which will also decrease footfall in town centres and cause parking stress and now has several unfortunate examples of schemes brought forward as 'trade counters' when in reality these are retail outlets.

25.8 As such, the Council proposes to limit trade counters which have the attributes of a shopping outlet, such as product displays, large sale areas and large numbers of parking spaces so that only genuine trade counters schemes come forward.

Ancillary Uses

25.9 Some non-industrial ancillary uses may be considered appropriate in industrial areas, such as small scale shops/cafes for workers, but the Council considers that these uses must clearly demonstrate they are solely aimed at servicing the needs of local workers. The Council considers that large-scale non-industrial uses will hamper industrial job growth in industrial areas and the conflict between members of the public and industrial vehicles within industrial estates would be unacceptable.

Improving the Industrial Environment

25.10 The Council will expect new industrial development to improve the environment of industrial estates by improving boundary treatments, where necessary, as well as the sites themselves and making transport infrastructure improvements. The Council may also ask for planning obligations to improve the public realm, signage and transport infrastructure in industrial estates.

Other Land in Industrial Use

25.11 Outside of the SILs and EILs, there are a number of industrial units which provide valuable local employment. The Council considers these are important to the vitality and employment opportunities of the borough and should not be lost. The Council is proposing a presumption against the loss of industrial uses outside of industrial areas unless the industrial uses are “bad neighbours” to surrounding residential development with the effects being unable to be mitigated. In these cases, the businesses will be permitted to relocate to the industrial estates. If there is no prospect of a vacant industrial site coming back into industrial use, certain requirements on marketing and re-use will apply.

Towards a Policy Approach

25.12 Based upon the evidence and analysis, the Council has established a series of policy principles and options for consideration as part of this Regulation 18 consultation. These are:

25.C Draft Policy 25 on Industrial Uses

Strategic Industrial Locations, Established Industrial Locations and Other Land in Industrial Use

- (a) Within Strategic Industrial Locations and Established Industrial Locations, the Council will grant planning permission for E(g)(ii) (research and development), E(g)(iii) (light industrial), B2 (industrial and manufacturing) and B8 (storage and distribution) uses or other similar industrial uses only.
- (b) Development proposals should not result in a net loss of existing industrial floor space for Class E(g)(ii), E(g)(iii), B2 and B8 uses in all designated industrial locations.
- (c) Within Strategic Industrial Locations and Established Industrial Locations, development

will be expected to contribute to environmental and transport improvements, either through on-site works or through planning obligations, where necessary.

- (d) The Council will not grant planning permission for co-location schemes in Strategic Industrial Locations. Co-location schemes proposed in Established Industrial Locations will be considered provided the principle of no net loss of existing industrial floor space is achieved.
- (e) The Council will grant permissions for proposals containing trade counters, provided that the display and sales areas are a maximum of 15% of the total net floorspace.
- (f) The Council will grant permissions for ancillary uses which will assist the functioning of the Strategic Industrial Locations and Established Industrial Locations, such as small shops and cafes, provided that it can be shown that the use meets only the needs of the employees within the industrial area.

Other Land in Industrial Use

- (g) Outside the main locations for industry, proposals resulting in the loss of industrial / business floorspace will not be granted planning permission unless it can be demonstrated that:
 - (i) The retention of the existing use will have a significant adverse effect on residential amenity and there is no reasonable prospect that this effect can be alleviated while retaining the use; or
 - (ii) There is genuine evidence that the site has been marketed for 12 continuous months at an appropriate rate with a recognised agent without success

25.D Regulation 18 Consultation Questions



- A. Do you agree with the draft policy on industrial uses?
- B. If you do not support the provisions of the draft policy, please give reasons and where possible suggest alternatives.

Issue 26 - Office Development

26.A Introduction

- 26.1** In line with national policy, the Council is required to set out planning policies to support town centres by allocating a range of suitable sites to meet identified office development needs, looking at least ten years ahead.
- 26.2** Set against the context of national policy requirements is the recognition that the office market has fundamentally changed. The introduction of permitted development rights in 2013 to allow the conversion of offices to residential development has seen a major reduction in office buildings and floorspace in Sutton. The past ten years has seen a dramatic reduction in floorspace with approximately 120,000 sq.m. lost. This rate of loss has reduced the office floorspace in the borough by around a third.
- 26.3** In addition, further structural changes have been brought about by the COVID pandemic, which has accelerated the use of technology and has facilitated a shift in working patterns where “*working from home*” and/or “*hybrid working*” has led to a significant reduction in demand for certain types of office space.

26.B Context for Sutton

- 26.4** The Adopted Local Plan (2018) supports the provision of an additional 23,000 sq.m. of office floorspace. However, in order to respond to the structural changes that have occurred in the office sector, the Council has commissioned a new Employment Land and Economic Needs Assessment (ELENA) (2023), which provides an up-to-date analysis of the office market and sets out a forecast for future office space requirements.
- 26.5** The ELENA is objective and transparent in noting that accurately forecasting future office demand is extremely difficult given the current circumstances, and the lack of any strong market signals post-pandemic; and that the long term future of the office market, and the demands for new office space are still highly uncertain.
- 26.6** However, what the ELENA identifies, and what has also been suggested to the Council by other commercial agents, valuers, and end-users is that the office market in Sutton is still very challenging. The assessments note that:
- Sutton is considered a secondary office market and business location within Greater London;
 - Occupiers are increasingly discerning about the physical quality of real estate, given the need to offer skilled employees good access, amenities and building quality; and that these factors determine occupier demand far more than rents.
 - Sutton’s lack of transport connectivity and lower quality of amenity provision means it is losing out to stronger competitors, e.g. Croydon, Wimbledon, Guildford; and

- Since the pandemic, office redevelopment and refurbishment has become increasingly unviable in many suburban office locations, especially secondary ones, due to increasing construction costs, subdued occupier demand, softening of investment yields, and reduced commercial capital values.

26.7 Notwithstanding these uncertainties, the ELENA has provided an economic forecast for both jobs and office floorspace. Again, the ELENA acknowledges that projecting forward past trends is not pragmatic, because the losses have been so considerable, and may not reflect the future. Also, the ELENA warns that economic forecasts identifying the number of future jobs will not automatically translate into floorspace, as the relationship between floorspace and jobs was broken before the pandemic, and the disconnect has if anything been amplified in the period since.

26.8 The ELENA, in line with national policy, has set out a jobs and floorspace forecast for Sutton. The data is set out below.

Jobs Forecast

26.9 Using Experian Economics data from 2022, the ELENA has provided a total office jobs forecast of **3,728 jobs** over the period 2022 to 2042. This equates to **186 jobs** per annum.

26.10 The ELENA notes that the forecast job growth is a function of overall population growth, and is forecast to be largely within professional services and the associated administrative and support activities.

Floorspace Forecast

26.11 In accordance with best practice, the ELENA uses the forecast jobs growth to derive a gross and net office floorspace figure. The calculation factors in forecast demand, forecast losses, planned supply, and an appreciation of jobs to floorspace requirements, using national and local data.

26.12 Accounting for the differences between national-level rates versus Sutton-specific rates of occupation, the ELENA provides an office floorspace range between **56,620 sq.m. and 81,583 sq.m.** over the period 2022 and 2042. This equates to an annual floorspace forecast range between **2,981 sq.m. and 4,079 sq.m.**

Towards a Policy Approach for Sutton

26.13 The uncertainty surrounding the office market makes it challenging to produce a justified and effective policy approach. However, the Council has a duty to meet identified need, while at the same time being positive and realistic. This is obviously hard in the current context – past trends are weak (negative) for both floorspace and jobs. The forecasts, both GLA and Experian remain positive. But as noted, these are forecast jobs and not floorspace.

26.14 The Experian forecasts presents a credible view regarding jobs, and following guidance and best practice these have been transcribed into space requirements using two scenarios.

- 26.15** The methodology in the ELENA is robust and consistent with national policy, but it operates on the basis of calculating gross and net demand using assumptions around forecast job growth and/or past trends of delivery. The methodological approach broadly assumes that the office market will return to the state that it was prior to the pandemic, and also operates on the basis that any loss of office space is replaced.
- 26.16** The Experian economic forecast indicates future growth at a level that, over the plan period, would return Sutton's stock to a level not seen since the early 2010s. Whilst there will undoubtedly be some upturn in demand in the medium-to-long term, a return to pre-pandemic and pre-Permitted Development Rights scenarios seems highly unlikely.
- 26.17** At present, given the feedback from estate agents, valuers, and end-users it would seem difficult to justify the assumption that any loss of office floorspace is re-provided, and in addition to any 'new' demand generated by jobs growth. Whilst it will be important to ensure there is sufficient choice and competition in the market (alongside a healthy vacancy rate to allow for churn), it is also important to acknowledge the emerging trends for greater working from home, hybrid-working, shared workspaces, co-located businesses, and the fact that not all 'new' jobs created will generate a requirement for new and additional floorspace.
- 26.18** It should be noted that since the ELENA was produced, the Office for National Statistics has released the travel to work data from the 2021 Census. It shows that 36.5% of Sutton's economically active residents (those 16 or older) are working from home. If this scale of working mainly from home continues into the medium term, it is set to have a significant impact on the requirement for additional office floorspace across the borough.
- 26.19** The Council does not yet have an updated GLA view of forecast jobs or floorspace requirements, and this makes policy making even more challenging. The ELENA shows that many more people now commute into London's Central Activity Zone (CAZ) than earlier evidence had envisaged. It is assumed these are mostly office workers and so the future of Sutton's office market, and the need for floorspace, is directly linked to future ways of working and the balance between the CAZ stock and that within Sutton. If more people are commuting to the CAZ, in combination with 36.5% of people mainly working from home, there could be significant downward pressure on any office floorspace requirement in Sutton.
- 26.20** On this basis the Council has drafted four potential options (Table 26.1 below) that cover a number of scenarios - ranging from meeting needs in full, through to meeting the first five-years' worth of identified need. Alongside this, it has drafted a 'preferred' policy, which strikes a balanced approach and considers how to meet identified need for the first 10-years of the local plan period.
- 26.21** The Council acknowledges that it still needs a strategy to meet need in full but, as is common practice with any development plan, the further in the future the need, then the less detailed the policy response. A short-term pipeline should be quantifiable and have a reasonable prospect of delivery.

26.22 The Council considers that the most pragmatic approach is to focus on the short to medium term – for example, the first five or 10 years of the plan, and allocate sites / formulate development strategies to ensure there is opportunity and choice in the market given current availability and pipeline opportunities are so low.

Towards a Policy Approach

26.23 Based upon the evidence and analysis, the Council has established policy options for consideration as part of this Regulation 18 consultation. These are:

26.C Draft Policy Principles & Options 26 for Office Development			
Table 26.1: Policy Options for Office Development			
Office Option 1	Office Option 2	Office Option 3	Office Option 4
Policy to meet office floorspace in full (81,583 sq.m.)	Policy to meet minimum office floorspace need (56,620 sq.m.)	Policy to realise sufficient floorspace to meet forecast annual office jobs for first 10 years of Sutton Local Plan (= 1,860 jobs & = 30,000 sq.m.)	Policy to realise sufficient floorspace to meet forecast annual office jobs for first five years of Sutton Local Plan (= 930 jobs & = 15,000 sq.m.)
<p><i>Approach:</i></p> <ul style="list-style-type: none"> • Acknowledges and applies the national ‘floorspace to job’ ratio of 12m². • Would identify site allocations to achieve the maximum forecast office floorspace, with a deliberate choice to allocate sites for Use Class E(g). • Sutton Town Centre would be the focus for the majority of office floorspace (70% = 57,108 sq.m.). Floorspace would be achieved through identified office zones and site allocations with specific requirements for Use Class E(g). • The seven District Centres would also serve as identified locations for planned 	<p><i>Approach:</i></p> <ul style="list-style-type: none"> • Applies a Sutton-specific ‘floorspace to job’ ratio of 7.4m². • Would identify and allocate sites to achieve the minimum forecast office floorspace, with a deliberate choice to allocate sites for Use Class E(g). • Sutton Town Centre would be the focus for the majority of office floorspace (80% = 45,296 sq.m.). Floorspace would be achieved through identified office zones and site allocations with specific requirements for Use Class E(g). • The seven District Centres would only have a residual role in delivering planned office floorspace 	<p><i>Approach:</i></p> <ul style="list-style-type: none"> • The policy target would be linked to achieving the forecast office job figure, rather than being focused on the quantity of floorspace delivered. This responds to short term uncertainty over office floorspace requirements, and provides flexibility in how the jobs and floorspace will be delivered on the ground. • The policy target and monitoring arrangements would focus on the first ten years of the new Sutton Local Plan. • Would take a permissive approach to facilitating office floorspace in Sutton Town Centre and the seven District 	<p><i>Approach:</i></p> <ul style="list-style-type: none"> • The policy target would be linked to achieving the forecast office job figure, rather than being focused on the quantity of floorspace delivered. This responds to short term uncertainty over office floorspace requirements, and provides flexibility in how the jobs and floorspace will be delivered on the ground. • The policy target and monitoring arrangements would focus on the first five years of the new Sutton Local Plan. • Would take a permissive approach to facilitating office floorspace in Sutton Town Centre and the seven District

<p>office floorspace (30% = 24,475 sq.m.). Floorspace would be achieved through identified site allocations with specific requirements for Use Class E(g).</p> <ul style="list-style-type: none"> • The London Cancer Hub would be expected to deliver office floorspace, but this would be considered separately from the identified office floorspace need figure. 	<p>(20% = 11,324 sq.m.). It is expected that this residual floorspace would be achieved through a greater amount of mixed use developments and through a greater recognition of broader uses within Use Class E (commercial, business and service), including those within Use Class E(c) and Use Class E(g).</p> <ul style="list-style-type: none"> • The London Cancer Hub would be expected to deliver office floorspace, but this would be considered separately from the identified office floorspace need figure. 	<p>Centres.</p> <ul style="list-style-type: none"> • Office floorspace is expected to come forward as part of mixed use development proposals. • There would be a greater recognition of broader uses within Use Class E (commercial, business and service), including those within Use Class E(c) and Use Class E(g). • The London Cancer Hub would be expected to deliver office floorspace, and this would contribute towards meeting the identified office floorspace need figure. 	<p>Centres.</p> <ul style="list-style-type: none"> • Office floorspace is expected to come forward as part of mixed use development proposals. • There would be a greater recognition of broader uses within Use Class E (commercial, business and service), including those within Use Class E(c) and Use Class E(g). • The London Cancer Hub would be expected to deliver office floorspace, and this would contribute towards meeting the identified office floorspace need figure.
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26.D Regulation 18 Consultation Questions



- Do you agree that the four options set out above represent reasonable alternatives to meeting office needs? Which one do you support?
- Do you think the Council should consider any other options to meet need?
- Do you support the Council's initial preference to plan for the first 5 to 10-years and for that figure to be based on the job forecast figures rather than floorspace figures?
- Do you think the Council should specifically identify sites and locations where office development should be delivered?
- Do you agree that office floorspace delivered at the London Cancer Hub should contribute to meeting the overall need for office floorspace in the borough? If not, what are the reasons for treating it separately?

Please give reasons and where possible suggest alternatives.

Issue 27 - Town Centres and Retail

27.A Introduction

- 27.1** Town and district centres play a crucial role in shaping the character and function of Sutton. Our town and district centres serve as community hubs, drawing together a mix of different uses, including: shopping, leisure, other forms of business through offices, hotels, bars and restaurants, community activities, as well as providing a range of homes for residents.
- 27.2** However, our town centres are experiencing major changes due to shifts in how people live their lives, how businesses operate, how consumers choose to spend their money, and how we choose to use the current stock of buildings and spaces.
- 27.3** These factors mean it is more important than ever for the policies in the Local Plan to strike the right balance between supporting the role of town centres to meet people's needs, whilst also allowing the flexibility to allow town centres to change and adapt to requirements.

27.B Context for Sutton

- 27.4** Sutton's network of town centres is focused on Sutton Town Centre, along with seven other District Centres. As an outer London borough, Sutton's town and district centres take on a variety of different roles - serving as destinations for consumer spending and activity, whilst also fulfilling the day-to-day requirements of residents and businesses.
- 27.5** However, it is clear that the challenges identified above, are directly affecting Sutton Town Centre and each of the District Centres. Locally, specific concerns have been raised in relation to:
- Loss of choice in the retail offer, combined with the effect of larger and more prestigious retailers leaving the borough;
 - A reduction in the range of town centre uses meaning that certain needs are not being met;
 - A dominance of certain uses and also deep-discount retailers, changing the dynamics of town and district centres with knock-on effects such as noise, disturbance, and anti-social behaviour;
 - A loss of ground floor retail to other uses, reducing the number of active frontages, altering the character and appearance of centres, and the sense that the look and feel of the traditional 'high street' has been lost;
 - An increase in residential and other commercial developments which serve to 'squeeze out' retailers, whilst also bringing additional impacts to services and infrastructure; and
 - A loss of complementary leisure, community, and social uses reducing their role as community hubs that help define a sense of place and foster community well-being.

- 27.6** Not all of these concerns are negative, and changes in the way that town centres function can bring benefits. The Sutton Local Plan needs to provide policies to help keep and improve the best of what is already in situ; whilst acknowledging the need for greater flexibility in the types of uses that will occur in our centres, and managing how these uses will evolve and change over time.
- 27.7** At a national level, the NPPF (2023) identifies that a local plan must define an overall town centre network, and create policies that will help to support their long term viability and vitality. The NPPF encourages local authorities to do this by allowing town centres to grow and diversify in a way that can respond to rapid changes in the retail and leisure industries, allows a suitable mix of uses (including housing), and reflect their distinctive characteristics.
- 27.8** It is important to acknowledge that the role of town centres is more complex and wide-ranging than just retail activity. Modern town centres include residential buildings; other forms of commercial activity (offices and businesses); spaces associated with public realm and open space; incidental activity - deliveries, building work, etc; and are also influenced by other uses and users, including transport infrastructure associated with road-users, walking, cycling, and public transport.
- 27.9** At a sub-regional level, the London Plan (2021) identifies Sutton Town Centre as being ‘Metropolitan’ in scale as part of their town centre network. This is the second highest classification (behind ‘International’) and means that the town centre serves a wider catchment which can extend over several boroughs and into parts of the wider South East. Typically, those of ‘Metropolitan’ scale contain at least 100,000 sq.m. of retail, leisure and service floorspace with a significant proportion of high-order comparison goods relative to convenience goods. These centres generally have very good accessibility and significant employment, service and leisure functions. Many have important clusters of civic, public and historic buildings.
- 27.10** The London Plan also classifies locations due to their role within the Night-Time Economy (NTE). Sutton Town Centre is categorised as being within ‘NT2 – Areas of regional or sub-regional significance’. Again, this means that Sutton Town Centre has a strategic night-time function involving a broad mix of activity during the evening and at night, including most or all of the following uses: culture, leisure, entertainment, food and drink, health services and shopping.
- 27.11** To help support an objective approach to policy-making in the review of the Local Plan, the Council has commissioned a Town Centres and Retail Needs Assessment (TCRNA) (March 2023).
- 27.12** The study provides a review of the issues facing town centres and the retail sector, at both a national and local level. It also assesses the future requirements for retail floorspace based on analysis of trends, feedback and insight from the sector, and a requirement to support the long term vitality and viability of town centres and the high street. The study assesses outputs up to 2042.

- 27.13** In overall terms, the study highlights that the consolidation of retail and diversification of uses will be one of the key issues to address to ensure that Sutton Town Centre maintains its relevance as the principal shopping and leisure centre in the borough. The study notes that investment is critical in order for the centre to keep up with that which is taking place in competing centres, such as Kingston-upon-Thames, and mitigate against further loss of expenditure to out-of-centre destinations (e.g. Valley Retail Park) and online.
- 27.14** Along with strengthening the role and attraction of larger centres such as Sutton, the research indicates that smaller centres can survive by serving the basic “essential” local convenience needs and essential services of their local resident (“walkable”) catchment populations. The rise of “essential” shopping in local shops and centres has been further illustrated by the impact of the pandemic, as more people had to work from home and shop locally. These trends should help to maintain and enhance the future vitality and viability of the smaller District Centres with a strong mix of food and convenience uses, along with essential services and other town centre uses.
- 27.15** The TCRNA provides specific analysis and conclusions on each of the following:
- Town Centre Network
- 27.16** The TCRNA concludes that the existing patterns of centres across the borough should be maintained, supported, and enhanced. This is effectively a hierarchy consisting of Sutton Town Centre, followed by each of the seven District Centres, then a network of Local Centres, and Isolated Shops.
- Retail Needs - Comparison & Convenience
- 27.17** The TCRNA carried out a retail capacity need assessment for new retail floorspace in Sutton (both comparison and convenience goods).
- 27.18** The NPPF requires local authorities to meet the need for retail and town centre uses “*looking at least ten years ahead*”. However, it is acknowledged that given the uncertainty in forecasting long-term retail trends and consumer behaviour, assessments “*may need to focus on a limited period (such as the next five years) but will also need to take the lifetime of the plan into account and be regularly reviewed*”. The study assesses retail capacity up to 2042, but greater weight should be placed on forecasts over the next five (to 2027) to ten-year period (to 2032).
- 27.19** The TCRNA indicates that there is no need for new convenience retail floorspace (the assessment calculates a negligible need figure of 73 sq.m. through to 2032); and no need for new comparison retail floorspace (the assessment calculates a continued loss of 4,143 sq.m. of floorspace through to 2032). Table 27.1 shows the study’s conclusions on retail needs in more detail and provides a breakdown of needs by each town and district centre.

Table 27.1: Retail Needs (Convenience Goods and Comparison Goods)

Location	Convenience Goods Capacity (net sales sq.m.)				Comparison Goods Capacity (net sales area)			
	2027	2032	2037	2042	2027	2032	2037	2042
Sutton Town Centre	-966	-817	-631	-460	-226	-2,618	-2,348	-1,802
Carshalton District Centre	43	82	124	157	-2	-70	-58	-39
Cheam District Centre	71	130	194	244	1	-92	-81	-59
Hackbridge District Centre	40	76	115	146	0	-5	-4	-2
North Cheam District Centre	26	56	97	133	-56	-297	-301	-273
Rosehill District Centre	35	67	101	128	-7	-22	-23	-22
Wallington District Centre	126	237	367	476	-20	-513	-433	-297
Worcester Park District Centre	27	42	55	66	-9	-123	-124	-110
Local Centres and Local Shops	73	155	263	360	-28	-129	-125	-108
Edge and Out-of-Town	24	45	69	90	-32	-275	-252	-198
Totals	-500	74	754	1,340	-380	-4,143	-3,749	-2,911

Source: Town Centres and Retail Need Assessment (2023)

Food & Beverage

- 27.20** The study identifies a need for 12,472 sq.m of new food and beverage space in the borough over the Plan period. It concludes that market interest is likely to be focused on Sutton Town Centre and the larger district centres where customer demand will be driven by resident, visitor, and commuter markets, respectively. Any new provision should help increase competition and consumer choice, and to underpin both daytime/evening economies.
- 27.21** In terms of locations, the study indicates that while the Sutton railway station area is a target area for more food and beverage offerings, there may be greater benefit in creating a restaurant quarter close to the Cinema on St Nicholas Way where there is greater potential for these activities to support each other. This would also allow better integration with the Council's regeneration plans for St. Nicholas Way, as well as the shopping area on High Street, and encourage lunch and early evening dining with shoppers.
- 27.22** The development of Throwley Yard should help to attract more evening time visitors to this area of the town centre and support a cultural offer by way of a new independent cinema and performance space, opening in June 2024.
- 27.23** In promoting the food and beverage economy, the Council will be mindful of the potential disadvantages that can be brought about by an over-concentration of hot food takeaway establishments. Specific concerns about their effects on health,

particularly the health of children and students, will mean that the Council will follow the London Plan's policy approach to limiting hot food takeaway uses across the borough.

Sequential Test & Impact Test

- 27.24** Local authorities are required to apply a sequential test to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan. Main town centre uses should be located in town centres, then in edge of centre locations, and only if suitable sites are not available should out of centre sites be considered.
- 27.25** As noted above, the study confirms the town centre hierarchy as Sutton Town Centre and the seven District Centres. Each of the centres has an existing defined 'town centre boundary', and these will be used to apply the sequential test.
- 27.26** When assessing applications for retail and leisure development outside town centres, which are not in accordance with an up-to-date plan, local authorities require an impact assessment if the development is over a proportionate, locally set floorspace threshold (if there is no locally set threshold, the default threshold is 2,500m² of gross floorspace).
- 27.27** The study has concluded that there are appropriate circumstances to define local thresholds for the impact test. The resulting thresholds are:
- For Sutton Town Centre = 500 sq.m. gross floorspace.
 - For each District Centre = 280 sq.m. gross floorspace.

Primary Shopping Areas

- 27.28** The Council must define the geographical extent of town centres - based upon the way they operate and their overall footprint; and place a boundary around these locations and define them as '*Primary Shopping Areas*'. Within these primary shopping areas, the local plan policies must make clear the range of uses permitted in each location.
- 27.29** The TCRNA has set out options for the extent of the Primary Shopping Areas for Sutton Town Centre and each of the seven District Centres. These are shown in Issues and Preferred Options Appendix 3, Maps 3.2a and 3.3a to 3.9b. These boundaries are subject to discussion and review and the Council welcomes feedback on them as part of the Regulation 18 consultation.

Supporting Non-commercial Uses

- 27.30** The TCRNA suggests the Council should encourage civic and community uses in town centres, which helps to draw in new town centre uses, and increases the opportunity for linked trips and expenditure with commercial businesses.
- 27.31** The introduction of healthcare, community, and education uses to the town centre can help drive footfall and stimulate linked trips with other businesses. Examples include health hubs and GP surgeries within mixed use schemes in urban locations. Promoting more multi-functioning community and civic venues can help

drive new footfall in town centres and can contribute to diversifying the town centre offer. In particular, education uses can help to support the vitality of town centres by supporting day time footfall in town centres.

- 27.32** The Council's acquisition of the St Nicholas Shopping Centre could be the first step in driving forward this type of regeneration. Proposals could support the relocation of the Council's offices from their Civic Offices on St Nicholas Way, which could help to boost and encourage day time trade on High Street.

Towards a Policy Approach

- 27.33** Based upon the evidence and analysis, the Council considers that it can move directly towards a draft policy approach for consideration as part of this Regulation 18 consultation. The draft policy is as follows:

27.C Draft Policy 27 on Town Centres & Retail

Hierarchy of Town Centres

- (a) The Council has established a network and hierarchy of town centres, this is set out in **Table 27.2** below.
- (b) A Primary Shopping Area (PSA) will be defined for the town and district centres. The options are shown in Appendix 3. The extent of the PSAs will be used in the application of the sequential test and impact test set out in Part (g) and (h).
- (c) Development proposals in the PSAs are expected to support the retail function of each town centre. Class E(a) retail uses will be prioritised in these locations, with non-Class E(a) retail uses only supported where they can demonstrate that the proposal will not undermine the vibrancy, vitality, and viability of the centre. Planning conditions may be used to secure Class E(a) uses.
- (d) 'Meanwhile uses' will be supported in vacant shopfronts and on vacant sites in town centres where proposed uses contribute to the diversity, vitality and viability of centres having regard to the scale of the proposal in relation to the centre's position in the hierarchy of town centres.
- (e) Development in District Centres and Local Centres should be appropriate in scale and function to the role of that centre.

Isolated Shops

- (f) Outside Town, District and Local Centres, the Council will not grant planning permission for the loss of Class E(a) retail within areas of more than 400 metres walking distance from alternative shopping facilities, unless it has been demonstrated that the shop has been marketed at a reasonable market rent through a recognised agent for 12 months.

Sequential and Impact Test

- (g) The vitality and viability of town centres will be maintained and enhanced by promoting a mix of uses, including housing. Town centres will be the preferred locations for retail and leisure developments, and other commercial, business and service uses, and will be used to inform the application of the sequential test and/or impact test.
- (h) Proposals for main town centres uses, which are not located within one of the town

centres, will be required to submit a retail impact assessment. The threshold for the retail impact assessments is as follows:

- (i) Sutton Town Centre = 500 sq.m. gross floorspace.
- (ii) District Centres = 280 sq.m. gross floorspace.

Hot Food Takeaways

- (i) In accordance with London Plan Policy E9, development proposals containing hot food takeaway uses (sui generis) should not be permitted where these are within 400 metres walking distance from the entrances and exits of an existing or proposed primary or secondary school.

Residential Development

- (j) Residential development will be permitted in town centres where it positively contributes to its role and function, and where:
 - (i) It delivers high quality, well designed mixed-use development in appropriate locations, and as part of identified Site Allocations;
 - (ii) The conversion of the upper floors, or the rear of the ground floor, occupied by a commercial or community use can be designed to provide a high level of residential amenity without compromising the existing or potential operation of uses on the ground floor.

For Sutton Town Centre Boundary, each of the seven District Centre Boundaries, and each of the Local Centres see the Local Plan Appendix and Policies Map.

Table 27.2: Hierarchy of Town Centres

Tier	Location(s)	Location & Extent
Metropolitan Centre	Sutton Town Centre	See Policies Map and defined Primary Shopping Area
District Centres	Carshalton Cheam Hackbridge North Cheam Rosehill Wallington Worcester Park	See Policies Map and defined Primary Shopping Area(s)
Local Centres	Angel Hill Banstead Road Beeches Avenue Belmont Beynon Road Carshalton Road Church Hill Road Erskine Road / Florian Avenue Gander Green Lane Hillcrest Parade Lind Road London Road / Hamilton	See Policies Map

	Avenue London Road / Staines Avenue Manor Road Middleton Circle North Street Oldfields Road Plough Lane Roundshaw Centre Stanley Park Road Stonecot Hill Sutton Common Road Sutton Common Station The Chase Upper Mulgrave Road Westmead Corner Westmead Road Wrythe Green Wrythe Lane	
Isolated Shops	Boroughwide	

27.D Regulation 18 Consultation Questions



- A. Do you agree with the draft retail hierarchy?
- B. Which option for the location and extent of the PSAs (see Appendix 3, Maps 3.2a and 3.3a to 3.9b) do you think is the most appropriate for the town and district centres?
- C. Do you agree with the thresholds set out for when to apply the retail impact test? If not, what threshold levels should be used?
- D. Do you agree with the Council's approach to restricting hot food takeaways near primary and secondary schools?

Please give reasons and where possible suggest alternatives.

Issue 28 - Education and Skills

28.A Introduction

- 28.1** As part of its statutory duty to ensure there are sufficient places within the borough, the Council undertakes place planning functions for primary, secondary and special school provision. This takes into account the current capacity of schools; the projected future demand for places; variations in demand across Sutton; and housing developments.
- 28.2** The requirement to provide education facilities is outlined in the NPPF (2023), paragraph 20, that states strategic policies should make sufficient provision for community facilities including education. Paragraph 99 requires sufficient choice of school places to meet the needs of existing and new communities. It adds that local planning authorities should take a proactive, positive and collaborative approach to requirements and widen choice in education. In addition, the London Plan (2021), Policy S3 'Education and Child Facilities' seeks to ensure that there is a sufficient supply of good quality education and childcare facilities to meet demand and offer educational choice.
- 28.3** The Council aims to provide a high standard of education and training for everyone. It has a statutory responsibility to ensure there are sufficient school places in the borough. The Council undertakes place planning functions for primary, secondary and special school provision.
- 28.4** This emerging policy will need to consider the current capacity of schools, projected demand for future places and proposed housing developments.

28.B Context for Sutton

- 28.5** The Office for National Statistics (ONS) data on demographic projections relating to births are used when reviewing the provision of education facilities. This data is assessed to establish if facilities have capacity to accommodate educational needs in the borough.
- 28.6** Current pupil projections, based on these birth rates, show there has been an overall decline in birth rates in the borough. This reflects the regional and national trends. ONS data shows that the number of births in Sutton has fallen since the Adopted Local Plan was prepared in 2017-18, from 2,642 to 2,350 in 2020-21. As a result the demand for primary school and secondary school places has decreased over this period and since the Adopted Local Plan.
- 28.7** Also, GLA data as detailed in Suttons' Strategic Needs Assessment 2023, shows that over the next decade net migration of children and young people into Sutton is likely to decline. Therefore, based on the evidence there may not be the requirement for more school places.

Current Position on School Places

Primary School Places

- 28.8** The Adopted Local Plan (2018) showed a rising birth rate and a demand for more school places. Since then many more school places have been delivered as well as a new school: Hackbridge Primary School completed in 2019 (with two forms of entry).
- 28.9** Since the Adopted Local Plan a total 420 new primary school places have been delivered. However, with a decline in birth rates and a decline in migration of children and young people into Sutton, there is less need for school places. In this policy school places are defined in two ways, the physical built capacity of the school (figures below) and the Published Admission Number (PAN). PAN is a figure set by the school that states the actual number of places available.
- 28.10** The majority of the additional primary school spaces created during this period have been taken up by children and young people in the borough and by new pupils moving into new housing developments. Therefore, there are approximately 400 surplus primary school spaces at present (as of the 2023/24 academic year), across all year groups. This is subject to change in future years. This demand for past primary school places has created a demand at secondary school level for additional places.
- 28.11** In 2015 the actual birth rate was 2,764 births, by 2016 the birth rate had peaked to 2,741 births in 2017 birth rates started to drop to 2,642, then in 2018 to a further decrease to 2,472, 2019 to 2,555 and finally 2020, to 2,350 (all ONS Calendar Year figures). During a 10 year period 2011 to 2021 birth rates fell by - 13.3%. This decline in live birth rates means there will be a reduction in the number of additional school places. This is in contrast to the previous live birth data when there was an increase in birth rates. Between 2001 to 2011 live births increased by 32% in the borough (as detailed in Sutton's Infrastructure Study 2017), resulting in more school places being delivered in the borough.

Secondary School Places

- 28.12** Historically, to meet the demand for places in secondary schools locally, the Council initiated the expansion of 10 secondary schools. Phase 1 and Phase 2 provided spaces during the period 2015 and 2016. From 2020, capital works were undertaken at a number of schools in Sutton to facilitate temporary additional classes. Some schools agreed to open additional classes without capital works being needed. These temporary additional places have been included in Table 28.1 below.
- 28.13** Since the Adopted Local Plan the two sites identified for secondary schools have progressed:
- The former Sutton Hospital site (Site LCH 1). The Harris Academy, this was completed in 2019. The site brings forward 1,275 new secondary school places.

- Rose Hill, All Weather Pitch part of the Site S98 was granted planning consent for 8 forms of entry (11-19 year olds). However, this permission is no longer being implemented (as another secondary school is no longer needed). Instead, permission for SEN provision only was granted in 2024.

Table 28.1: Primary and Secondary Schools Expansion ¹⁵

School Expansion	Number of extra places
Primary School Expansion since 2009	4,445
Secondary School Expansion since 2015	2,760
Temporary Secondary School Expansion 2020 to 2028	2,162

Medium Term Forecasts

- 28.14** School spaces are principally planned at Year R (primary) and at Year 7 (secondary). To understand the number of school places that may be required, over the medium term, projections are made. Issues considered in medium term forecasts are birth rates, inward/out migration which appears to be decreasing according to recent trends, changes in the spaces coming forward as children and young people move to the independent sector, cross border movements and birth rates. In recent years, there has been net migration out of London, and out of Sutton. Child births have also been falling since 2020. Each year, the Council produces a set of pupil forecasts. These forecasts are available from the Department for Education website:
<https://explore-education-statistics.service.gov.uk/data-tables/school-capacity>
- 28.15** Sutton’s Strategic Needs Assessment 2023 states that: *“[o]ver the last decade 2011-2021, Sutton’s population was estimated to be 209,517 as of ONS’ mid - 2021 estimates, an increase of 9.6% in the last decade (from 2011 to 2021 according to the mid year population estimates)”*.
- 28.16** The Strategic Needs Assessment goes on to point out that in this time, *“the borough’s population has grown more rapidly than London (7.2%) and England (6.5%) averages. This growth has happened despite a decline in the birth rate (reflecting the regional and national trend) and seems to have been largely driven by migration of children into the borough”*.
- 28.17** In addition, the Strategic Needs Assessment identifies that *“[b]etween 2011 to 2021, the population of under 15’s in Sutton has increased by 15.7%, which is more than the London (3.4%) and England (4.6%) averages’*. It should be noted that this growth has happened despite a decline in the birth rate (reflecting the regional and national trend) and seems to have been largely driven by migration of children into the borough seeking excellent schools on offer. In the most recent 6-year

¹⁵ Sutton’s school expansion programme
https://www.sutton.gov.uk/w/school-expansion-programme?p_l_back_url=%2Fsearch%3Fq%3Deducation%2Band%2Bschool

period (from 2015 to 2020), Sutton experienced the second largest net inflow of children (aged up to 15 years old) of all London boroughs.

28.18 However, over the next decade it is predicted that population will grow at a slower rate, the number of children and young people living in the borough is likely to decline. This is as a result of lower projected birth rates and a possible reduction in migration, which has driven population growth over the last ten years.

28.19 Table 28.3 below gives a projection of possible demand for Reception (Year R) school places.

Table 28.3 Reception Demand Profile Information, DfE School Capacity Return 2023

	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30
Projection for Year R	2,228	2,165	2,124	2,075	2,034	2,000
With 2% unfilled	2,273	2,208	2,166	2,117	2,075	2,040
Permanent PAN (Published Admission Numbers)	2,602	2,572	2,520	2,520	2,520	2,520
Additional Need in Forms of Entry (FE)	0	0	0	0	0	0

28.20 Table 28.3 identifies the capacity of Year R in the borough's primary schools including primary school expansions that have taken place. Previously there was a significant increase in live birth rates, while between 2010 to 2020 there was an overall decrease in live births in ONS figures. Therefore, for the next plan period, demand for both primary and secondary school places is likely to be less. Table 28.4 below the demand and capacity at Year 7 in the borough's secondary schools, which shows sufficient capacity in existing secondary schools.

Table 28.4 Year 7 Demand Profile

	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30
Projection for Yr 7	3,415	3,385	3,463	3,419	3,320	3,197
Permanent PAN (Published Admission Numbers)	3,441	3,441	3,471	3,441	3,311	3,281
Need in form of Entry (FE)	0	0	0	0	0	0

28.21 Sutton as a local area is generally an importer of pupils from neighbouring local authority areas, particularly at Secondary phase, given the high proportion of selective school places available. As the level of surplus capacity grows within these neighbouring borough, it is anticipated the demand on Sutton area school places for out of borough children will fall. As a result the pupil projections above, may over-forecast pupil numbers.

Special Educational Needs School Provision

28.22 Primary and secondary Special Educational Needs School Provision is required in the borough. To date the following SEN school provision in Sutton is as follows:

Table 28.6 Existing SEN/SEND schools

SEND school	Number of capacity /pupils	Independent or State Funded
Brookways School London (7-17 yrs)	80/68	Independent
Carew Academy (7-16)	254/254	State
Greenholm School (11-20 yrs)	120/119	Independent
Lavender Lodge School (4-12 yrs)	65/65	Independent
Linden Bridge School Worcester Park (4-19 yrs)	140	Independent
Sherwood Park School (2-19 yrs)	180/180	State
The Anchor School (5-11 yrs)	15	Independent
The Limes College (5-16 yrs)	180/180	State
The Link School (4-19 yrs)	152/152	State
Wandle Valley Academy (5-16 yrs)	80/83	State
Sutton Tuition And Reintegration Service	75/75	State

Table 28.7 Existing SEN/SEND Specialist Resourced Provision

SEND Specialist Resourced Provision	Number of places
Muschamp Primary School Opportunity Base	52
Avenue Primary Opportunity Base	60
Foresters Primary Opportunity Base	42
Woodfield Primary Base (Oakfield)	42
Green Wrythe Primary Base (Rainbows)	56
Greenshaw Secondary Base	25
Glenthorne Secondary Base	24

Cheam High PEP (post-16)	8
Oaks Park High School Base (Horizons)	65
Rushy Meadow High School Base	11 (not full - 6 on roll)
Overton Grange High School Base	7

28.23 All these schools currently have full school places with the exception of Rushy Meadows.

28.24 The Council is currently building a new SEN school at Sheen Way Playing Fields, Wallington. This new facility will provide 246 school places for children and young people aged 5 to 19 years old. The facility will be called Carew Academy, children currently at the existing Carew Academy site will move over to the new site when it opens in 2025. In addition, a new SEN Free School on the All-Weather Pitch and Part of the Tennis Centre at Rosehill Recreation Ground is being progressed. The new Angel Hill School will offer 96 places; planning consent has been granted, and the school is due to open September 2025. In addition, there is planning permission for a private SEN school in Give Road, Sutton, providing 45 places for 11-19 year olds.

Adult Learning and Higher Education

28.25 The law requires that all young people in England continue in education or training until at least their 18th birthday. The Council, together with a number of external providers, offers a wide range of adult, community and further/higher education courses that help people back into work. They also enable volunteering, the development of skills, and better long-term outcomes for residents. The two main institutions offering adult learning and further/higher education courses in the borough are Sutton College and Carshalton College.

28.26 The Council will keep SEN need under review as the plan progresses through its preparation to understand if there are any additional requirements arising.

Sutton College

28.27 This is the main provider of adult education and training in the London Borough of Sutton, offering over 1,000 part-time courses in the day and evening. It offers courses from four locations in the borough:

- St Nicholas Way, Sutton.
- Woodcote Road, Wallington.
- Carshalton College (evening centre) Nightingale Road, Carshalton.
- 660 London Road, North Cheam.

28.28 The Council is bringing forward the Civic Centre site for redevelopment. As part of these plans the Council is considering moving Sutton College, directly onto the High Street into a Council owned building 246-254 High Street.

Carshalton College

28.29 Carshalton College has been an education provider in the London Borough of Sutton for 60 years. The college offers a wide range of adult and further/higher

education courses for students: full time, access and part time, apprenticeships, undergraduate, and supported learning.

Towards a Policy Approach

28.30 Based upon the evidence and analysis, the Council considers that it can move directly towards a draft policy approach for consideration as part of this Regulation 18 consultation. The draft policy is as follows:

28.C Draft Policy 28 on Education and Skills

- (a) The Council will provide or support the provision of new or expanded primary, secondary, special schools and further educational facilities, to meet the needs of Sutton's population and enhance educational provision in the borough.
- (b) The Council will safeguard the following sites for SEND provision:
 - Sheen Way Playing Fields, Wallington
 - All-Weather Pitch and Part of the Tennis Centre at Rosehill Recreation Ground.

The Council will keep the need for new primary and secondary schools under review. If required, the Council will search for additional sites during the plan period.

- (c) The Council will support adult learning and further/higher education providers in the borough and will balance their requirements with those of other sectors and the local community. In assessing applications for further and higher education uses, the Council will ensure that such developments are sensitive to their surroundings, take into account the impact on the mix of uses in the area, be in areas of good public transport accessibility and seek to protect residential uses and the local environment.

28.D Regulation 18 Consultation Questions



- A. Do you agree with the draft policy on Education and Skills?
- B. Do you agree with the sites identified for SEND provision schools in the draft policy?
- C. Do you agree with the criteria used to determine the design and location of education and skills facilities in the borough?
- D. If you do not support the provisions of the draft policy, please give reasons and where possible suggest alternatives.

Issue 29 - Health and Well-Being

29.A Introduction

- 29.1** One of the key objectives of the Local Plan is to provide for the necessary health facilities. The need to plan for health infrastructure is supported by the NPPF (2023) and Policy GG3 of the London Plan (2021). In addition, national and regional policy encourages local plans to support healthy environments and lifestyles. This is reflected in a range of Local Plan objectives, such as protecting open spaces and encouraging sustainable travel choices, and encouraged through a range of policies throughout the plan. The main focus of this Health and Well-being policy is to support the provision of healthcare infrastructure provided by key partners.
- 29.2** Planning for health infrastructure is complex and involves multiple organisations working together. The Health and Care Act 2022 introduced Integrated Care Systems (ICSs) which are partnerships that bring together NHS organisations, local authorities and others to take collective responsibility for planning healthcare provision, improving health and reducing inequalities across geographical areas. The London Plan (Policy S2) encourages boroughs to work with NHS and community organisations to identify and address local health and social care needs in the local plan. The London Plan also supports the release of surplus buildings and land for other uses where this is part of a wider public service transformation plan (Policy S1 and S2).
- 29.3** Proposals for healthcare facilities are also assessed against Issue 30 on Social and Community Infrastructure.

29.B Context for Sutton

The Integrated Care System in Sutton

- 29.4** The South West London Integrated Care System was created in 2022, covering six south west London boroughs: Croydon, Kingston, Merton, Sutton, Richmond and Wandsworth. Integrated Care Systems (ICS) are made up of two key bodies - an Integrated Care Board (ICB) and an Integrated Care Partnership (ICP).
- 29.5** The South West London ICB is the statutory NHS organisation responsible for planning and funding most NHS services in the six boroughs. The South West London ICP is a committee that brings together organisations to reduce health inequalities and improve the care, health and well-being of people in the six boroughs. Some responsibilities and budgets are delegated to borough level. Within Sutton there are four Primary Care Networks which bring together GP practices with community, mental health, social care, pharmacy, hospital and voluntary services in their local areas. Epsom and St Helier University Hospitals NHS Trust and the Royal Marsden Hospital NHS Foundation Trust are key acute and specialist care providers.

29.6 The SW London ICS takes account of borough priorities identified in joint strategic needs assessments and in health and well-being strategies. The Sutton Health and Care Plan (the borough’s health and well-being strategy) identified the challenges for the borough including poor physical and mental health, persisting health inequalities in areas of deprivation, and increased demand for primary care, community and acute hospital services.

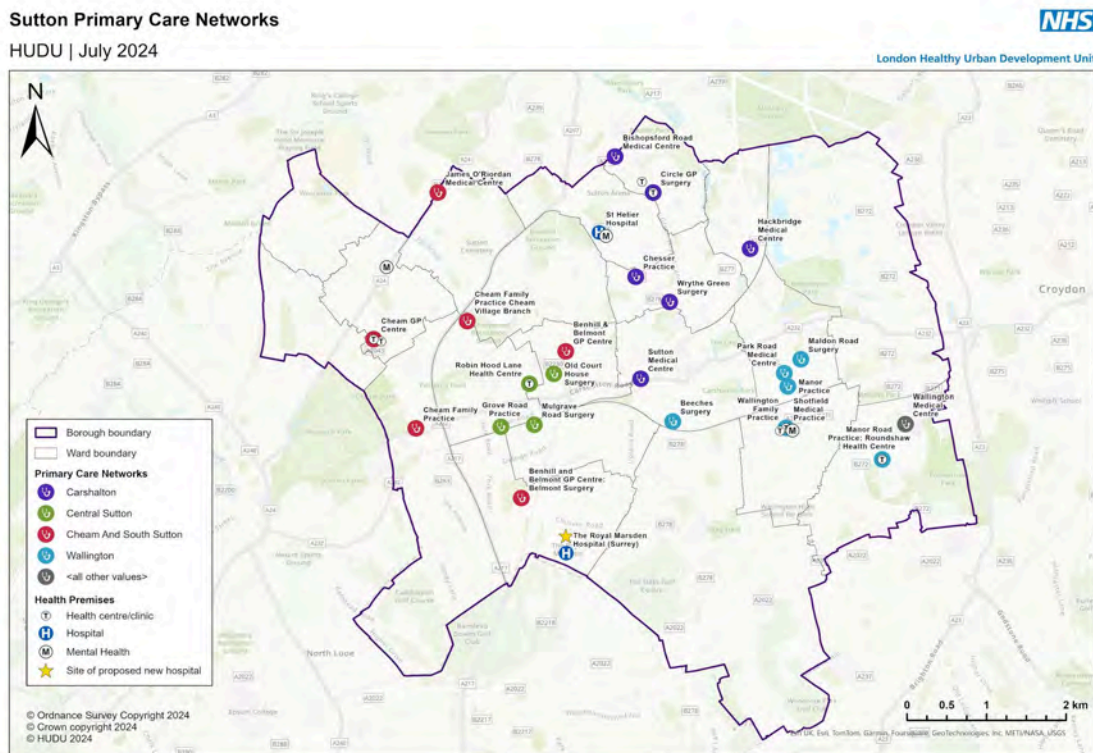
Healthcare Estate in Sutton

29.7 There are four Primary Care Networks (PCNs) in Sutton, which bring together GP practices with community, mental health, social care, pharmacy, hospital and voluntary services in their local areas. The PCNs are: **Carshalton**, **Central Sutton**, **Cheam & South Sutton**, and **Wallington**.

29.8 Epsom and St Helier University Hospitals NHS Trust and the Royal Marsden Hospital NHS Foundation Trust are key acute and specialist care providers. South West London St George’s Mental Health services are based in Cheam Resource Centre, Jubilee Health Centre and St Helier Hospital. Figure 29.1 provides an overview of the existing primary and secondary care healthcare services in Sutton (as at July 2024).

29.9 Epsom and St Helier University Hospitals NHS Trust and the Royal Marsden Hospital NHS Foundation Trust are key acute and specialist care providers. South West London St George’s Mental Health services are based in Cheam Resource Centre, Jubilee Health Centre and St Helier Hospital. Figure 29.1 provides an overview of the existing primary and secondary care healthcare services in Sutton (as at July 2024).

Figure 29.1: Map of Primary and Secondary Healthcare Services in Sutton (July 2024)



Source: Healthy Urban Development Unit (HUDU), originally from SHAPE/SWLICB (July 2024)

29.10 Some of the issues faced within the healthcare estate include building conditions (particularly St Helier Hospital), and poor functional suitability in some of the primary care estate. SWLICS has confirmed that there has been recent investment in the estate, with projects including:

- Hackbridge Medical Centre on Spinning Wheel Way;
- Belmont GP Centre branch at Hardegray Close; and
- Oak Cancer Centre, Royal Marsden.

29.11 South West London ICB has agreed a new NHS Infrastructure Strategy for the South West London ICS to enable the SWL Joint Forward Plan 2023-28 and ICP Strategy 2023-28. The strategy sets out the importance of health infrastructure in serving the needs of local populations and a vision for the future, cutting across the physical estate, use of digital technology, the NHS' net zero ambitions and how they support infrastructure workforce to deliver, including:

- **Smarter, better health and care infrastructure** - NHS infrastructure should be person-centred, serving the needs of all users and supporting delivery of quality care. It should be the right size in the right place, treating people as close to home as possible, and provide the right setting in the right condition. The estate and digital infrastructure should enable integration and collaboration between health and care services to deliver joined up care for the population.
- **Stronger, greener buildings** - providing a physical environment that enhances positive user and staff experience and improves health outcomes across all settings. Buildings that are safe, well maintained and resilient, future proofed and adaptable to change. Our infrastructure should support a net zero NHS by 2040 and all buildings should be energy efficient.
- **Fairer efficient use of resources** - ensuring infrastructure is optimised to delivery clinical services required, levelled up to provide a consistent offering across SWL and configured to support access to services that tackles health inequalities. The NHS will work with ICS partners and One Public Estate to ensure we are getting value for money for the public sector as a whole and supporting the financial sustainability of the health and care system. We will harness the role of the NHS as an anchor institution for growth and community cohesion.

29.12 SWLICS' approach to primary care assessment has used a national benchmark of one full-time GP per 1,800 patients. However, primary care is changing with a wider range of clinicians and many more people living with one or more long term conditions. There have also been changes in infection control impacts on space requirements as well as the increasing importance, and use, of digital infrastructure.

29.13 As well as considering metrics for how growth and population change may affect the demand for GP services, it is also important to remember that creating any new healthcare facility goes beyond a pure assessment via town planning and

local plan-making. The process involves multiple organisations working together. The ICS takes collective responsibility for planning healthcare provision, improving health and reducing inequalities, but at the same time it must be acknowledged that GPs remain as independent contractors, which means they operate GP surgeries with a considerable degree of independence.

The NHS London Healthy Urban Development Unit (HUDU)

29.14 The HUDU model forecasts the additional health demand that will result from new residential development. The model has been consistently used across London, and is referenced in Chapter 11 of the London Plan (2021) as part of understanding the funding and delivery of infrastructure across the capital.

29.15 The model makes some assumptions about the housing mix to forecast additional population generated by housing development. population forecasts were then used to calculate the healthcare outputs in terms of floorspace and capital/revenue cost outputs for:

- Acute healthcare (elective inpatient beds/non-elective inpatient beds/day case beds)
- Mental healthcare (mental health beds)
- Intermediate (rehabilitation/aftercare) healthcare (intermediate beds and day spaces)
- Primary healthcare (number of clinical rooms)

29.16 The HUDU Model does not include outpatients, A&E and the London Ambulance Service. HUDU has undertaken more recent analysis of additional space requirements for the different growth scenarios in the plan over a 15 year period, with needs ranging from approximately **3,000 sq.m. to 5,500 sq.m. of healthcare space.**

29.17 The ICB commissioned a review of Primary Care Estates needs in the borough and will be working up plans to address shortfalls in space and capacity planning, with an emphasis on improving utilisation of existing buildings, targeted investment and enhanced digital infrastructure.

29.18 The successful funding and delivery of additional health infrastructure and capacity alongside the changing and growing population will need to account for sub-regional level NHS budgets facilitated through SWLICS; and also the ability of partners to work together to engage directly with development applications and provide an evidence-based assessment of how developments are impacting on healthcare provision, in order to open-up discussions on whether planning obligations can be secured for development proposals.

29.19 Based on the current understanding of healthcare infrastructure provision in Sutton, and the analysis of the likely impact of planned growth, the Council (in collaboration with SWLICS / NHS / HUDU) expects the following infrastructure issues to be addressed as part of delivering the new Sutton Local Plan:

- New health/primary care facilities within Sutton Town Centre, including potential sites at the St Nicholas Centre / Civic Centre / Secombe Theatre site(s) - where evidenced and as required;
- There is currently a deficit of primary care ‘consultation space’ across Sutton, based on high-level capacity and demographic analysis. Planned further growth will require suitable healthcare provision that may not be possible to deliver within the footprint of existing premises.
- Improvement and enhancement of provision at existing primary care facilities, where the ICB has evidence of strategic need, aligned to health priorities and growth;
- At locations in ‘high street’ premises in Sutton Town Centre, District Centres, and Local Centres (Class E premises), where evidenced and as required; and
- Redevelopment at St Helier Hospital site as part of the hospital refurbishment and following the relocation of some services to a new specialist emergency care hospital at the London Cancer Hub site;
- In addition, the Council supports the ambitions for the overall London Cancer Hub site as a health and life-science campus. This includes:
 - proposals for major laboratory, research & development, and office space focused on cancer research and human healthcare on land leased by the Council;
 - a new build Specialist Emergency Care Hospital; and
 - development of the Royal Marsden and Institute of Cancer Research as centres of medical excellence in providing cancer care, research facilities, and associated activities.

29.20 The Council will also continue to explore options and possibilities for further provision in Cheam / North Cheam; as part of the Council’s estate regeneration (Benhill, Elm Grove, Chaucer, Collingwood and Sutton Court estates); and as part of the development on the former B&Q site. Any provision in these locations will be secured through direct engagement with the NHS / SWLICS, and the landowners / developers bringing forward specific sites.

The London Cancer Hub

29.21 The London Cancer Hub is an important development site in the borough and is addressed at Issue 8 in this document. The wider site is home to the Royal Marsden Hospital providing specialist cancer care, and the Institute for Cancer Research. Epsom and St Helier University Hospitals NHS Trust are proposing to build a new Specialist Emergency Care Hospital adjacent to the Royal Marsden Hospital and London Cancer Hub development site.

Supporting Health Infrastructure

29.22 The Adopted Local Plan (2018) identified locations where healthcare facilities and improvements were needed. The Local Plan Review needs to reflect completed

development and identify opportunities to address new requirements where appropriate. The Council will work with the South West London ICS and other relevant health organisations to identify health infrastructure requirements for the Infrastructure Delivery Plan, building on priorities identified in the Health and Care Estates Strategy, and to inform policy and site allocations in the Local Plan Review. The draft policy principles below sets out how the plan can support the health needs of the borough and reduce health inequalities. It includes a number of potential site allocations for new health facilities or improvements to existing ones. The Council recognises that development of these potential sites is dependent on NHS funding, and the priorities for development may change in the forthcoming Estates Strategy Review. As such, the Council can identify sites for future healthcare facilities but it cannot absolutely guarantee that they come forward as they are not direct providers.

29.23 In addition to health facilities, there is a range of infrastructure which contributes to people’s health and well-being, such as open space and sports facilities, as they promote healthy lifestyles.

Towards a Policy Approach

29.24 Based upon the evidence and analysis, the Council has established a series of policy principles for consideration as part of this Regulation 18 consultation. These are:

29.C Draft Policy Principles 29 on Health and Well-being

- (a) The Council will support the provision of new or improved healthcare facilities in the borough, in line with NHS England, South West London Integrated Care System, and Sutton Primary Care Network requirements.
- (b) The Council will support the provision of facilities to meet the accommodation needs for additional health infrastructure to serve the general increase in population across the borough particularly in areas of deprivation. The Council has identified a range of potential sites and areas where health facilities could be located below. The Council recognises that development of sites is dependent on NHS funding and priorities may change:
 - (i) new health/primary care facilities within Sutton Town Centre including potential sites at St Nicholas Centre site redevelopment / Civic Centre / Secombe Theatre site;
 - (ii) new health centres in Cheam / North Cheam;
 - (iii) new healthcare facilities as part of the Council’s estate regeneration (Benhill, Elm Grove, Chaucer, Collingwood and Sutton Court estates);
 - (iv) a new primary care development on the St Helier Hospital site as part of the hospital refurbishment and following the relocation of some services to a new specialist emergency care hospital at the London Cancer Hub site;
 - (v) a new healthcare facility as part of the development on the former B&Q site;
 - (vi) expansion of provision at existing primary care facilities, where demand is high; and
 - (vii) at locations in ‘high street’ premises in Sutton Town Centre, District Centres,

and Local Centres (Class E premises).

- (c) The Council supports the ambitions for the overall London Cancer Hub site as a health and life-science campus, and expects relevant landowners and partners to collaborate on development proposals as set out at Issue 8 on the London Cancer Hub (and Site Allocation LCH1). This includes proposals for:
 - (i) major laboratory, research & development, and office space focused on cancer research and human healthcare on land leased by the Council;
 - (ii) a new build Specialist Emergency Care Hospital; and
 - (iii) development of the Royal Marsden and Institute of Cancer Research as centres of medical excellence in providing cancer care, research facilities, and associated activities.
- (d) The Council will support the aim to improve access to primary care facilities, which could involve extending GP surgery hours and will also support the re-use of social infrastructure and the co-location of services wherever possible.
- (e) The Council will also require development to contribute positively to creating high quality places that support healthy communities. The Council will therefore support development that involves the retention and improvement of facilities that promote healthy lifestyles, such as leisure facilities and open space (including playing pitches, allotments, and children's play spaces) throughout the borough and will promote healthy, economic and sustainable alternatives to the car.

29.D Regulation 18 Consultation Questions



- A. Do you agree with the draft policy principles on Health and Well-being?
- B. Do you support the potential site allocations for new /improvements to health facilities?
- C. If you do not support the draft policy principles, please give reasons and where possible suggest alternatives.

Issue 30 - Social and Community Infrastructure

30.A Introduction

- 30.1** One of the key objectives of the Local Plan is to deliver an adequate supply of social and community infrastructure. These facilities are essential to support people's everyday lives and are used by residents, workers and visitors to the borough.
- 30.2** The term social and community facilities consists of a wide range of social infrastructure including: Healthcare, including primary care/GP surgeries; Education, adult learning and training; Sports and leisure facilities; Police stations; Community venues, halls; Cultural facilities e.g. theatres, museums, live music venues and art galleries; libraries; places of worship; public houses and public toilets. Specific details relating to education and health are set out in Issue 28 on Education and Skills and Issue 29 on Health and Well-Being, respectively.
- 30.3** Paragraph 20 of the NPPF states that strategic policies should make sufficient provision for community facilities, and Paragraph 97, advises that LPA's should plan positively for the provision and use of shared spaces and community facilities.
- 30.4** The London Plan Policy GG1 'Building Strong and Inclusive Communities' seeks to secure access to good quality community infrastructure. Policy S1 'Developing London's Social Infrastructure,' suggests that new facilities should be in accessible locations like high streets in town centres and easily accessible by public transport, cycling, walking and cars. Facilities should be delivered to meet the strategic needs within public service providers estate strategies. In addition, redundant social infrastructure should be considered for full or partial use as other forms of social infrastructure before alternative developments are considered, unless this loss is part of a wider public service transformation plan.

30.B Context for Sutton

Protection of Sutton's Social and Community Facilities

- 30.5** Social and community facilities are important as they help to enhance the quality of life of residents and workers in Sutton. These facilities improve personal health and well-being and create opportunities for social interaction that help to deliver a sense of community.
- 30.6** Due to the scarcity of suitable land and competing land uses, without protection these uses could be lost to other uses. Where possible community uses which serve the borough-wide community should be located in accessible locations.

Providing Facilities to Meet Population Growth

- 30.7** The Council's role in relation to social and community facilities is to protect existing community facilities, as well as ensure that these facilities have the capacity to meet the needs of the existing community. New development will bring

a pressure on existing social and community provision. This may result in the need for the provision of new facilities. When examining the impact of new development, the Council will look at the likely number of future occupants of the proposed scheme, existing facilities accessible to the development and their capacity.

30.8 The Council has recently commissioned a Playing Pitch & Outdoor Sport Strategy - Winter Assessment Report (March 2024), and an Indoor and Built Facilities Needs Assessment and Strategy (March 2024). The Council has received the draft findings from these reports, which provide an assessment of current pitches, facilities and assets in the borough, appraises whether they are currently up-to-standard and suitable, and then assesses the impact of additional growth and the likelihood of there being shortfalls in provision.

30.9 The draft assessments have shown that there is a shortfall in certain sports facilities and assets. The draft findings are still subject to further review and may change as the assessments are finalised later in 2024. The emerging findings indicate shortfalls in:

- Full-size 3G pitch provision, with the FA model suggesting a need of over six pitches to meet training requirements. In addition, the full-size pitch at Carshalton Athletic Football Club will reach the end of its 10-year recommended lifespan by 2025 and thus will require resurfacing in the near future to maximise its quality.
- Rugby union pitch capacity in Sutton. The figures show only a minimal deficit that could be overcome through better utilising the existing stock, rather than there being a need for increased provision.
- Some degree of unmet demand for BMX activity, particularly away from the northern area of the borough.
- There are below average quality sports halls at Carshalton Boys Sports College and Pulse Health and Fitness, both of which serve residents in the north of the borough where there are fewer good and above average quality facilities.

30.10 In addition, the needs assessment has identified that there are strategic challenges in relation to built assets at Cheam and David Weir leisure centres, both of which are in need of refurbishment, or possibly in the case of Cheam - replacement. The analysis indicates that both sites need to be retained (or equivalent provision provided). As such, clear decision-making will be required over the short-to-medium term, to schedule the improvement works and co-ordinate the necessary resources (both capital finance and in a project management sense) to deliver both schemes.

30.11 In respect of current and future facility supply for swimming, the assessment suggests that capacity at Sutton's two public leisure centres is limited, and that a large proportion of its residents have to travel to access pools in neighbouring boroughs. Again, the Council will need to consider how it can increase and sustain access to swimming provision for the short, medium and long-term whilst also acknowledging funding constraints and reduced resources. Collaborating with

Sutton High School to address highlighted issues with regard to swimming pool quality and to ensure the continued availability of its pool for club use will be an important part of the overall strategy to continue to deliver swimming provision in the borough. It is a key strategic site for swimming given the limitations of facilities available for Sutton and Cheam Swimming Club.

- 30.12** Whilst there is a good supply of health and fitness facilities in the borough, the assessments have shown that facilities at Sutton Sports Village are underutilised. The assessment suggests that the Council should consider whether a reconfiguration of this site (incorporating an increased focus on accessible / low resistance equipment and spaces for health consultation) could deliver better health and wellbeing outcomes for the Council.
- 30.13** Several clubs in different sports in the borough are at membership capacity due either to current facility size or reliable availability. As such, there is a need to support clubs seeking to access new / different facilities to enable them to continue to grow participation. Sports to which this applies include badminton, swimming, and gymnastics.
- 30.14** In the case of large developments, social and community facilities may be required on site, which will be secured through a Section 106 agreement. Alternatively, monies from schemes may need to be pooled to deliver a new facility off-site via the Community Infrastructure Levy.
- 30.15** The Council will work closely with local service providers, such as healthcare and education, to ensure we plan effectively for the public health and education needs of our local communities.

Managing Social and Community Facilities

- 30.16** A key role of this policy will be to assess proposals that deal with the loss of social and community facilities. Public service providers, such as the NHS, have their own asset management plans. These set out how their properties will be managed, identifying future facilities. The Council will support the delivery of these proposals in these plans, where possible. In some cases this could involve the rationalisation and/or co-location of different forms of facilities.
- 30.17** The private sector also plays an important role in the provision of social and community facilities. For example, it provides a valuable range of leisure, health, childcare and educational services, from private medical facilities, dentists, opticians, to childcare facilities and gyms. While these facilities provide services to the local community, they are essentially businesses and provide their services on a commercial basis rather than to meet the needs of all sectors of the community. In addition, the voluntary sector provides an equally valuable role providing local services to Sutton's communities.

Assets of Community Value

- 30.18** The Localism Act 2012 introduced the 'Community Right to Bid' and introduced 'Assets of Community Value' (ACV). These are buildings or other land, which have community value in its current, recent or future use, and could help to improve

social well being or social interests in the community. This could include uses such as parks and open spaces, libraries, theatres, museums, heritage sites, cinemas, swimming pools and public houses. The process of establishing a community asset is as follows:

- The community identifies a building or other land use they feel is important to their communities well being.
- Make a bid to buy it on the open market.
- They nominate it to the Council, who will determine if the building or land is an Asset of Community Value.
- The nomination will be judged on the following criteria below :
 - The application is being made by a community nomination board consisting of 21 members and other members supporting the application;
 - The building or other land is used by community groups for community activities for a cross section of the community and;
 - Current use furthers the wellbeing and interests of others.
- If determined to be an asset it will be listed.

The Council would welcome applications from voluntary or community groups seeking to register public houses and other uses.

30.19 The Council would welcome applications from local voluntary or community groups seeking to register community facilities as Assets of Community Value and would consider them against the above criteria.

Public Houses in Sutton

30.20 Public houses add to the character of town and local centres and residential streets. The architecture of these buildings adds to the historic street scene and these uses provide important social and community functions. Since the introduction of Assets of Community Value a number of public houses have been nominated to be listed in Sutton.

30.21 Many public houses have threatened closure or closed in recent years as a result of 1) alcohol duty escalator; 2) the economic slowdown and cost of living crisis, 3) Covid closures lead to many pubs being unable to afford to reopen; 4) aggressive profit targets by pubs; 5) alcohol being sold as a loss leader in supermarkets.

30.22 In May 2017, the Government withdrew permitted development rights that allow public houses to be demolished without planning permission, which has given them extra protection. Given their street scene and community value, the Mayor of London encourages boroughs to bring forward policies to maintain, manage and enhance public houses, the Council will seek to support public houses in the Local Plan, including those with a particular streetscene value. In September 2020, changes to the Use Classes Order meant public houses alongside a range of other uses became Sui Generis uses. As a result, any proposed change to and from a Sui Generis use would require planning permission. This offers further protection to changing these uses.

Towards a Policy Approach

30.23 Based upon the evidence and analysis, the Council considers that it can move directly towards a draft policy approach for consideration as part of this Regulation 18 consultation. The draft policy is as follows:

30.C Draft Policy 30 on Social and Community Infrastructure

- (a) The Council will grant planning permission for the development of new social and community infrastructure (as defined in the glossary) where it:
- (i) is accessible by a range of transport modes, in particular by walking, cycling and public transport.
 - (ii) provides flexible and adaptable space, where practicable.
 - (iii) is close or accessible to the community it is intended to serve and is of a suitable scale to meet that need.
 - (iv) is designed and sited to enable the shared use of premises and playing fields for community purposes.
 - (v) would not have any adverse environmental effects.
 - (vi) in the case of proposals for large developments generating significant numbers of trips such as indoor sports facilities, are located within or on the edge of town centres or other areas of higher public transport accessibility.
- (b) The Council will not grant planning permission for development that involves the loss of social and community infrastructure unless:
- (i) it can be demonstrated that the facility is no longer required, for example the facility is being reconfigured, repurposed, upgraded, or relocated to improve services as part of a published strategy by a local service provider.
 - (ii) there is no demand for an alternative social and community use for that floorspace.
 - (iii) suitable alternative provision is made or is available nearby.
- (c) New social and community facilities will be encouraged on larger development schemes where there is a need.
- (d) Public houses and bars of historic or architectural interest and/or community value will be protected from demolition and/or change of use. Proposals involving the loss of public houses will be permitted provided that it can be demonstrated that:
- (i) no historic or architectural interest would be lost; and
 - (ii) the public house has no community value and is not viable as a pub or that it could not be used for another social or community use by requiring a full and proper marketing exercise for a period of at least 12 months.

30.D Regulation 18 Consultation Questions



- A. Do you agree with the draft policy on Social and Community Infrastructure?
- B. If you do not support the provisions of the draft policy, please give reasons and where possible suggest alternatives.

Issue 31 - Utilities and Digital Infrastructure

31.A Introduction

- 31.1** The Council is required to plan for utilities, telecommunications, and digital infrastructure as these are all key components of economic growth and social well-being. Normally, all regulated utilities infrastructure necessary to support growth is delivered by the statutory providers and network operators, and this plan assumes that this will be the case. Investment in energy and water infrastructure is usually funded by providers through user charges (with the exception of heat networks, which are covered in Issue 3 on Net Zero Carbon and 42). It should be noted that waste requirements are addressed through the South London Waste Plan (2022).
- 31.2** Planning policies and decisions should support the expansion of electronic communications networks, including next generation mobile technology (such as 5G and 6G) and full fibre broadband connections. Policies should set out how high quality digital infrastructure, providing access to services from a range of providers, is expected to be delivered and upgraded over time; and should prioritise full fibre connections to existing and new developments (as these connections will, in almost all cases, provide the optimum solution).

31.B Context for Sutton

Approach to Utilities and Digital Infrastructure

- 31.3** The Council recognises the importance of ensuring that new homes and developments are supported with sufficient utilities, such as water and sewage, and digital infrastructure, including fast broadband connections.
- 31.4** When major development proposals come forward, developers should engage with utilities providers at the earliest opportunity in the design and construction process. This includes water supply and sewer system, wastewater drainage, electricity and energy including heat network operators, digital connectivity, and communications. This is to ensure there will be sufficient utilities capacity to meet the increased demand, and that the predicted demand increase will not impede the utilities availability for current or future growth.
- 31.5** The Council supports the expansion of high-quality, reliable electronic communication networks, including telecommunications and high-speed broadband, and will facilitate the expansion of this technology as it is key to economic growth. In addition, digital technology will help foster social benefits and play a vital role in the provision of local community facilities and services, and is a key priority of the Ambitious for Sutton corporate plan. The Council expects development to be supported by the latest digital infrastructure and encourages early discussions with operators. This will include provision for 5G and 6G technology and Fibre To The Premises (FTTP).

Design of Utilities and Digital Infrastructure

- 31.6** In addition to ensuring that Sutton has sufficient utilities and digital infrastructure to support growth it is also important to ensure that its design and location does not create a safety hazard or detract from the character of their surroundings, taking into consideration the potential impacts on the amenity of the area and local residents.
- 31.7** Telecommunications equipment can be very intrusive in public spaces and the overall number of masts and sites should be limited to only what is necessary for operational needs, including future capacity linked to the planned growth in the borough. Digital equipment, such as CCTV, traffic counters and air quality monitoring stations are often located adjacent to streets and could be better managed. It will be necessary to balance the need for such equipment with the need to protect the character and appearance of the area, particularly in certain sensitive areas
- 31.8** Proposals to install new telecommunications equipment will be required to submit information alongside the planning application demonstrating that efforts have been made to source compatible equipment to existing installations and to identify opportunities for co-location. Where co-location is not possible, the report should clearly set out the efforts that have been taken, and the reasons why co-location is not feasible. In addition, equipment should not conflict with the general design, streetscape, and heritage requirements of other policies in this section of the Local Plan.
- 31.9** The Council normally expects that applications for telecommunications development (including for prior approval under the General Permitted Development Order) should have the necessary evidence to justify the proposed development. This includes:
- the outcome of consultation with organisations with an interest in the proposed development (for example, if a mast is to be installed near a school)
 - for an addition to an existing mast or base station, a statement that self-certifies that the cumulative exposure of the development will not exceed International Commission on Non-Ionising Radiation Protection guidelines
 - for a new mast or base station, evidence the applicant has examined erecting antennas on an existing building, mast or other structure and a statement that self-certifies that, when operational, the International Commission guidelines will be met.
- 31.10** For tall buildings, where design is particularly sensitive, telecommunications equipment needs to be carefully considered as it has the potential to detract from the overall appearance of the building.

Towards a Policy Approach

31.11 Based upon the evidence and analysis, the Council considers that it can move directly towards a draft policy approach for consideration as part of this Regulation 18 consultation. The draft policy is as follows:

31.C Draft Policy 31 on Utilities and Digital Infrastructure

Overall Approach to Utilities and Digital Infrastructure

- (a) Major development proposals must ensure there is sufficient utilities infrastructure capacity, (including electricity, water, and sewage) to meet the demand from the development. Major development proposals will be expected to:
 - (i) undertake engagement with utilities and service providers at the pre-application stage to ensure the construction approach and end design of the development address utilities providers' requirements, and to ensure utilities networks and connections can serve the development. Evidence of the engagement, along with relevant load and consumption data and proposed routing, should be provided in a utilities statement.
 - (ii) demonstrate that the spatial, visual, amenity, and environmental impacts of new, expanded, or reconfigured utilities and services infrastructure will be avoided, remedied, or mitigated.
- (b) Major development proposals are required to deliver Fibre To The Premises (FTTP) broadband, mobile telecoms, small cell 5G and 6G digital infrastructure where possible. A digital infrastructure statement must be submitted as part of the utilities statement to demonstrate how this will be achieved, which should:
 - (i) establish how FTTP will be provided to serve the development and that it will be engaged at first occupation; or
 - (ii) be supported by evidence that demonstrates it would not be practical, viable or feasible to deliver FTTP.

Design Considerations for Digital Infrastructure

- (c) All telecommunications/digital infrastructure development should be sited and designed in such a way that it does not adversely affect the appearance of the surrounding area. The Council will only grant planning permission of telecommunications equipment where:
 - (i) The siting is not intrusive in the street scene and the design is of a height, scale and appearance which does not unduly detract from the character of the area or unacceptably harms the amenities of occupiers of neighbouring sites unless there is a specific need which outweighs the harm
 - (ii) All alternative sites which fulfil the functional requirements of the equipment have been assessed.
 - (iii) It has been demonstrated that the use of existing facilities or sharing equipment with other operators has been considered and is not possible.

- (iv) Consideration has been given to the need to cater for the future growing demand for network development, including that of other operators.
- (v) Every effort has been made to minimise the visual impact of the proposal.
- (vi) The applicant has demonstrated that the development will operate within the International Commission on Non-Ionizing Radiation Protection guidelines for public exposure.

31.D Regulation 18 Consultation Questions



- A. Do you agree with the draft policy on Utilities and Digital Infrastructure? Please give reasons, if possible.
- B. If you do not support the provisions of the draft policy, please give reasons and where possible suggest alternatives.

Issue 32 - Green Belt and Metropolitan Open Land

32.A Introduction

- 32.1** One of the key objectives of the Local Plan is to use the Green Belt, Metropolitan Open Land, the parks and other open spaces to protect the open feel of the borough. The NPPF (2023) attaches great importance to Green Belt land and clearly sets out in detail the development which is inappropriate within it. The fundamental aim of the Green Belt is to prevent urban sprawl and its essential characteristics are its openness and permanence. Metropolitan Open Land (MOL) is strategic open land within the urban area. The London Plan (2021) Policy G3 affords it the same status and level of protection as Green Belt land, and states that MOL should be protected from inappropriate development in accordance with national planning policy tests that apply to the Green Belt.
- 32.2** The NPPF states that there is no requirement to review Green Belt boundaries, however authorities can choose to review and alter boundaries in exceptional circumstances through the Local Plan process. The London Plan allows for similar changes to MOL boundaries. Exceptional circumstances can include the need to allow for unmet development need and for the provision of infrastructure.

32.B Context for Sutton

Metropolitan Green Belt

- 32.3** The borough has two areas of Green Belt at Cuddington and Woodcote; the Cuddington Green Belt, which comprises housing and a golf course; and the Woodcote Green Belt, which is more traditional open land with scattered housing and agricultural businesses.
- 32.4** The purpose of the Green Belt (as set out in the NPPF) is to: check the unrestricted sprawl of large built-up areas; prevent neighbouring towns merging into one and another; assist in safeguarding the countryside from encroachment; preserve the setting and special character of historic towns; and assist with urban regeneration.
- 32.5** As part of the Local Plan evidence gathering, the Council has prepared a Green Belt and Metropolitan Open Land Review and assessed Cuddington and Woodcote Green Belt against these five purposes. The Green Belt in Sutton makes the strongest contribution to Green Belt purposes in preventing urban sprawl. This is primarily the function of the Cuddington Green Belt, and is strengthened by its position in linking adjacent areas of Green Belt in neighbouring boroughs Epsom and Ewell and Reigate and Banstead. The Woodcote Green Belt also primarily acts to prevent sprawl, and also has a role in preventing the merger of settlements in Sutton and Croydon, and in preventing encroachment of urbanising uses from areas characterised by agricultural uses and other appropriate Green Belt uses. It also adjoins Green Belt in neighbouring boroughs Reigate and Banstead and Croydon.

Metropolitan Open Land (MOL)

32.6 The borough has 18 areas of MOL. It is a London designation which protects land that either: contributes to the physical structure of London; includes open air facilities which serve significant parts of London; contains features or landscapes of national or metropolitan value; or forms part of a strategic network of green infrastructure (and one of the above).

32.7 The Council assessed MOL against these purposes, and concluded that it made a contribution to them. Whilst some sites scored better than others, all MOL parcels were considered to meet at least two MOL purposes, in contributing to the physical structure of London by being clearly distinguishable from the built up area, and forming part of a network of green infrastructure. Strategic green networks include the Wandle Valley Regional Park and areas part of the All London Green Grid. Most MOL parcels make some contribution in terms of historic or biodiversity value, containing Sites of Importance for Nature Conservation of Metropolitan or borough Importance and/or designated heritage assets.

Potential additional areas of MOL

32.8 The London Plan illustrates the extent of MOL in Figure 8.1 of the London Plan. This includes some additional sites to those identified in the Adopted Local Plan at Mellows Park, Queen Elizabeth Walk, Anton Wetlands and Westbourne Primary School, Collingwood Recreation Ground and Gander Green Lane Allotments, and Seears Park and Perretts Field. As new designations of MOL are made through the Local Plan process, the Council assessed these areas against the MOL criteria and concluded they generally fulfilled some MOL purposes, with the strongest contribution being their role as part of a wider network of open space. In addition, the Council assessed Carshalton Park, as this is the only larger area safeguarded for the Wandle Valley Regional Park (a strategic network of green infrastructure) that is not designated as MOL. These potential additional areas are shown in Appendix 5, Schedule 5.B(i) and Maps 5.22a - 5.22g.

32.9 The London Plan and NPPF notes that any changes to MOL boundaries should only be in exceptional circumstances and consideration given to whether alternative policies would be adequate. All of the additional areas identified are already protected by existing Local Plan open space policy designations, though designation as MOL sets stronger tests against development, requiring 'very special circumstances'.

Potential Boundary Changes arising from Call for Sites submissions

32.10 The Council undertook a Call for Sites consultation in 2022. The responses included sites within the Green Belt and sites within MOL for uses which would be 'inappropriate' as set out in the NPPF and London Plan. The potential de-designation of these sites is included here for consultation purposes, and are also listed as potential site allocations in Chapter 4 at Table 4.1. This does not necessarily mean the Council agrees with the suggested use, but has been included for the purposes of consultation. Any de-designation of land would need to demonstrate exceptional circumstances, such as the need to allow for unmet development need. The sites and suggested uses are:

- Woodcote Grove House - for care village / residential;
- Land east of Woodmansterne Lane - for residential;
- 1-3 Metcalfe Avenue, Carshalton - for residential and or employment purposes;
- Land to the east of Grove Place, Woodmansterne - for Gypsy and Traveller pitches;
- Land at Jessops Way - for industrial and/or storage, or residential and commercial;
- Land west of Beddington Lane - for industrial and/or storage;
- Former Mortuary Site - proposed use residential; and
- Land north of Goat Road - for industrial and/or storage.

32.11 These sites are also listed in Appendix 5, Schedule 5.B(iii) and include the potential site allocation reference, with site maps included in Table 4.1.

Proposed Minor Boundary Changes

32.12 In evaluating the contribution of Green Belt and MOL, consideration was also given to the strength of the existing boundaries, in whether they were clearly defined *“using physical features that are readily recognisable and likely to be permanent.”* Some anomalies were identified and some minor boundary changes are proposed to allow for a more recognisable and defensible boundary set out in Appendix 5 Schedule 5.A and 5.B(ii), and Maps 5.3a, 5.22h to 5.22s. Some corrections are also proposed to amend some minor discrepancies to the size of areas shown in hectares at Appendix 5, Schedules 5A and 5.B.

Towards a Policy Approach

32.13 The Council attaches great importance to both the Green Belt and MOL and considers both designations are integral to the character of the borough. Since the adoption of the Local Plan in 2018, the NPPF includes some additional circumstances of development not inappropriate in the Green Belt, namely redevelopment or limited infilling of previously developed sites where this would contribute to meeting an identified affordable housing need within the borough where this would not cause substantial harm the openness of the Green Belt. An option to update the Adopted Local Plan is set out below (Option 1) so that it continues to reflect updated national and regional policy. However, as the NPPF sets out in detail how to manage development in the Green Belt, and the London Plan clearly sets out that the same approach should be applied to managing development in MOL, another option is included to simplify the policy so that it avoids unnecessary repetition with the NPPF on inappropriate uses and exceptions (Option 2). Both options still clarify how the impact on openness will be assessed within Sutton.

32.C Draft Policy Options 32 on Green Belt and Metropolitan Open Land

Policy Option 1

- (a) The Council will not grant planning permission for inappropriate development in the Green Belt or Metropolitan Open Land unless other material considerations clearly outweigh the harm to the Green Belt or Metropolitan Open Land and constitute very

special circumstances. The construction of new buildings and structures or the re-use of buildings and structures in the Green Belt and Metropolitan Open Land will be inappropriate unless it is for the following purposes:

- (i) agriculture, horticulture or animal-related businesses.
- (ii) appropriate facilities for outdoor sport and recreation and cemeteries.

Any new buildings or structures or the re-use of buildings and structures should preserve the openness of the Green Belt or Metropolitan Open Land.

- (b) The Council will grant planning permission for extensions to, alterations to and the replacement of an existing building or structure in the Green Belt or Metropolitan Open Land provided that:
 - (i) the increase in the external volume of the built form is no greater than 30% above the size of the original building or structure; and
 - (ii) the proposals would be proportionate in relation to the existing building or structure taking into account the mass, scale and any increase in ridge height.
- (c) The Council will grant planning permission for redevelopment of previously developed sites comprising two or more non-ancillary buildings, excluding temporary buildings, which would:
 - (i) not have a greater impact on the openness of the Green Belt or Metropolitan Open Land than the existing development; or
 - (ii) meet an identified affordable housing need within the borough where the development would not cause substantial harm to the openness of the Green Belt or Metropolitan Open Land.

Policy Option 2

- (a) The Council will protect the Metropolitan Green Belt and Metropolitan Open Land from inappropriate development unless very special circumstances can be demonstrated in accordance with National Planning Policy and the London Plan.
- (b) Any extensions to, alterations to and the replacement of an existing building or structure in the Green Belt or Metropolitan Open Land should:
 - (i) result in an increase in the external volume of the built form which is no greater than 30% above the size of the original building or structure; and
 - (ii) be proportionate in relation to the existing building or structure taking into account the mass, scale and any increase in ridge height.

(a) Potential Additions to Green Belt and MOL:

1. Mellows Park
2. Queen Elizabeth Walk
3. Anton Wetlands and Westbourne Primary School
4. Collingwood Recreation Ground and Gander Green Lane Allotments
5. Sears Park and Perretts Field
6. Carshalton Park

(b) Potential Deletions from Green Belt and MOL*:

1. Woodcote Grove House, Woodmansterne (Green Belt)
2. Land east of Woodmansterne Lane (Green Belt)
3. 1-3 Metcalfe Avenue, Carshalton (Green Belt)
4. Land to East of Grove Place, Woodmansterne (Green Belt)
5. Land at Jessops Way, Beddington (MOL)
6. Land west of Beddington Lane, Beddington (MOL)
7. Former Mortuary Site, Oldfields Road/Kimpton Park Way (MOL)
8. Land north of Goat Road (MOL)

*These sites relate to Call for Sites submissions/potential Site Allocations. Inclusion here does not necessarily mean the Council agrees with the release. They have been included for the purposes of consultation.

32.D Regulation 18 Consultation Questions



- A. Which policy option on Green Belt and MOL do you prefer?
- B. If you do not support the provisions of the draft policy options, please give reasons and where possible suggest alternatives.
- C. Do you support the designation of additional areas of MOL set out above and shown in Appendix 5, Schedule 5.B(i) and Maps 5.22(a) - 5.22(g) ?
- D. Do you support the potential deletions of Green Belt and MOL set out above and shown in Appendix 5, Schedule 5.B(iii) ?
- E. Do you support the proposed minor boundary changes as set out in Appendix 5, Schedule 5.A and 5.B(ii) and Maps 5.3(a), 5.22(h) to 5.22(s) ?

Where possible, please give reasons for your above answers.

Issue 33 - Agricultural Land

33.A Introduction

- 33.1** Agricultural activities in London bring benefits such as healthy local and seasonal food, and connection to nature. It also contributes to the range of environmental services provided by the Green Belt in general; from absorbing air pollution to providing a habitat for wildlife, as well as protecting the Green Belt itself. The Mayor’s London Plan also encourages the identification of places where food growing can take place.
- 33.2** The NPPF (2023) states that planning policies and decisions should contribute to and enhance the natural and local environment by recognising the wider benefits from natural capital and ecosystem services, including the economic and other benefits of the “best and most versatile agricultural land”.
- 33.3** In England and Wales Agricultural land is graded by quality under the Agricultural Land Classification (ALC) system, ranging from Grade 1 (excellent quality) to Grade 5 (very poor quality). The grading is used to inform planning decisions affecting greenfield sites.

33.B Context for Sutton

Background

- 33.4** Despite being part of Greater London, Sutton still retains some farming activities. The Woodcote Green Belt is dotted with weatherboard houses which were built as smallholdings for returning World War I soldiers. They were distinctive not only for the weatherboard construction but also for their lack of fences and hedges. Subsequent policies have encouraged the enclosure of the land around the smallholding properties but the general openness of the area still remains.
- 33.5** Only a small number of smallholdings remain in agricultural use and sometimes the open, rolling landscape is marred by standard, functional agricultural buildings which are prominent in the landscape and other agricultural equipment. A number of the other smallholdings have become private dwellings while the area is also home to a number of horticultural and animal-related businesses. The Council considers that a mix of private dwellings in the existing buildings, agriculture, horticulture and animal-related businesses is an appropriate use for the area.
- 33.6** The north-eastern part of the Woodcote Green Belt is classified as Grade 2 (of 5) agricultural land and the remainder is Grade 3. This means that the whole area is classified as Best and Most Versatile Agricultural Land.

Permitted Development

- 33.7** Since 2013, the Government has introduced a number of permitted development rights which means that the Council has less influence on how the area develops. In summary and subject to some restrictions, agricultural buildings can extend and

can convert to the following without the need for a planning permission: residential dwellings, shops, professional services (estate agents, solicitors etc), restaurants and cafes, offices, warehouses, hotels and hostels and leisure facilities (cinemas, concert halls, skating rinks etc). Therefore, a Council policy on the types of land uses in the agricultural area can only be aspirational.

Agglomeration

33.8 To maintain the distinctive open landscape of the Woodcote Green Belt, it is important that buildings remain scattered and residential curtilages are small to reflect the history of the area. An agglomeration of neighbouring residential dwellings with large curtilages would create a gradual urbanisation of the area and a loss of character. Furthermore, the area is not suitable for any further housing development being served by almost no public transport and connected by paths and a few private roads.

Towards a Policy Approach

33.9 Based upon the evidence and analysis, the Council considers that it can move directly towards a draft policy approach for consideration as part of this Regulation 18 consultation. The draft policy is as follows:

33.C Draft Policy 33 on Agricultural Land

On agricultural land, defined as the Woodcote Green Belt:

- (a) The Council will only grant permission for agricultural, horticultural and animal-related businesses provided that they are of a scale appropriate with the size of the site.
- (b) The Council will only permit development that would lead to the loss of the Best and Most Versatile if:
 - (i) it has been demonstrated that the benefits of the development outweigh the loss of Best and Most Versatile; and
 - (ii) the loss would not result in a reduction of the viability of the remaining agricultural land.
- (c) The Council will not permit new agricultural, horticultural or animal-related business buildings unless it is satisfied that they are necessary, do not affect the character of the area and that there are no other suitable buildings on the site for the proposed use. The Council will assess whether existing agricultural, horticultural, or commercial buildings are being used for those purposes. Proposals must be accompanied by a comprehensive business diversification plan, which establishes how the proposals will assist the viability of the business.
- (d) The Council will grant planning permission for residential units arising out of the replacement or redevelopment of vacant agricultural, horticultural, or commercial buildings, provided that
 - (i) it can be demonstrated the building had been in active agricultural, horticultural, or commercial use for a 10-year period prior to its becoming vacant and there is no prospect of the building being used for agricultural,

- horticultural, or commercial use in the future;
- (ii) it can be evidenced that a replacement building for agricultural, horticultural, or commercial use would not be viable; and
 - (iii) the residential unit will have a maximum plot size of 0.2ha for each detached dwelling and 0.1ha for each semi-detached dwelling.

33.D Regulation 18 Consultation Questions



- A. Do you agree with the draft policy on Agricultural Land?
- B. If you do not support the draft policy, please give reasons, and where possible suggest alternatives.

Issue 34 - Open Spaces

34.A Introduction

- 34.1** One of the key objectives of the Local Plan is to use the Green Belt, Metropolitan Open Land, the parks and other open spaces to protect the open feel of the borough. Open spaces have many roles including providing for recreation and physical activity; encouraging social interaction; promoting health and well-being and quality of life; providing facilities for children's development; encouraging walking and cycling; reducing flood risk; and safeguarding biodiversity.
- 34.2** The NPPF (2023) and London Plan (2021) recognise the benefits of a network of high quality open spaces. The London Plan Policy G4 states that authorities should undertake a needs assessment of open space to inform policy which should identify areas of public open space deficiency, and to protect open space to meet needs and address deficiencies. The London Plan also states that local plans should make provision for burial space needs (Policy S7).
- 34.3** The Mayor has also produced Supplementary Planning Guidance (SPG) on the strategic green infrastructure network - All London Green Grid (2012). The London Plan 2021 notes that this SPG will be reviewed and updated.

34.B Context for Sutton

- 34.4** Open spaces include green spaces such as parks and allotments, natural habitats, play grounds, sports pitches and amenity space. The Adopted Local Plan designates different types of open space for protection which form part of the network of open space comprising:
- 71 Public Open Spaces (space which is open to the general public without any constraints apart from opening hours, generally over 0.4ha in size);
 - 26 Urban Green Space (which are areas of open land which generally have some restriction on public access such as private sports clubs); and
 - 31 Allotment sites.
- 34.5** The Adopted Local Plan also identifies strategic networks of open space comprising Metropolitan Green Chains and green spaces safeguarded for the Wandle Valley Regional Park. These strategic designations can include areas of Metropolitan Open Land, Public Open Space, Urban Green Spaces, Allotments, Sites of Importance for Nature Conservation and other open spaces.

Open Space Assessment and Open Space Deficiencies

- 34.6** A comprehensive open space assessment was initially carried out in the Open Space Study 2005. This identified and audited 678 open spaces, of which 450 had unrestricted public access; 172 limited access; 15 restricted access (out of bounds to the general public); and 41 no public access. The 678 open spaces ranged from very small roadside spaces, to larger parks such as Beddington Park.

This information was used to calculate the amount of access to open space per 1000 population at borough and ward level (Schedule 5.I Local Plan Appendix 2018) . This was based on areas which were publicly accessible (a total of 519.45 hectares) and for certain categories only included spaces over a defined size threshold. An Open Space Study Update (2016) was produced as evidence for the Adopted Local Plan (2018) and provided an update on gains and losses of open space by assessing planning permissions.

- 34.7** The Council has updated the ratio of access to open space per 1000 population based on 2021 census data, new ward boundaries and to reflect new built development (see Appendix 5, Table 5.1 for Open Space access by Ward). The overall amount of accessible open space is now 518.1 hectares, with an overall ratio for the borough of 2.47ha per 1000 population. Open space distribution is not evenly distributed across the borough, and at a ward level the provision ranges from 8.11 ha per 1000 population in Carshalton South, to 0.11 ha in Wallington South.
- 34.8** The Adopted Local Plan also identifies deficiencies in access to open space assessed against the categories set out in Table 8.1 of the London Plan for Metropolitan, District and Local Parks. The provision and distribution of these is unchanged, and areas of deficiency remain the same. The Adopted Local Plan also identifies deficiencies in access to local and neighbourhood equipped areas of play. The provision of new local equipped areas of play has improved access, though significant deficiencies in access remain (see Maps 5.29-5.31).
- 34.9** It is important that the Council continues to protect our existing parks and open spaces as the projected level of growth over the plan period, as well as additional demand from outside the borough, will place increasing pressure on existing open space, as the number of users increase. It is also important to seek new provision in developments and to encourage enhancement of existing open spaces.
- 34.10** The Council prepared a Parks and Open Spaces Strategy (2020-2025) which sets the strategy to manage and enhance parks and open space, including allotments. The strategy notes that the Council provides approximately 2,500 allotments plots within the borough, and demand for plots remains high. The Council also recently commissioned a Playing Pitch & Outdoor Sport Strategy - Winter Assessment Report (March 2024), and an Indoor and Built Facilities Needs Assessment and Strategy (March 2024). These reports provide an assessment of current pitches, facilities and assets in the borough, appraise whether they are currently up-to-standard and suitable; and then also assess the impact of additional growth and the likelihood of there being shortfalls in provision. These assessments will be taken into consideration in applying the policy below.

Strategic Networks of Open Space

- 34.11** The network of open space provides additional benefits, such as interconnected accessible routes for pedestrians and wildlife. The Mayor's All London Green Grid SPG recognises the role of such networks, and identifies strategic networks across London. The Adopted Local Plan designates strategic networks of Metropolitan Green Chain (MGC) and spaces for the Wandle Valley Regional Park (Local Plan

Appendix Map 5.23, 5.27 and 5.28). These also reflect networks identified in the All London Green Grid SPG. Most MGC is also designated as Metropolitan Open Land (MOL). The Council is consulting on whether the five remaining areas of MGC should be considered for MOL designation given their strategic importance to the network of open space (Issue 32 above). If these areas are designated as MOL, this could supersede the MCG designation.

34.12 The Wandle Valley Regional Park is a network of green spaces designated by the London boroughs of Croydon, Merton, Sutton and Wandsworth to promote public access, biodiversity improvements and heritage protection throughout the Wandle Valley. The restoration and provision of public access to Beddington Farmlands (see Issue 11), will provide additional publicly accessible open space in the borough which will help address existing deficiencies in access to open space and to support future growth.

Burial Space

34.13 The Council has burial capacity for at least 30 years at two sites within the borough at Sutton and Bandon Hill cemeteries utilising new plots at Sutton and reclaimed graves at both sites. In addition, the Council has safeguarded land for burial space on sites within existing areas of open space (all Metropolitan Open Land). As the borough has sufficient burial space to meet its needs until well beyond the plan period and is considering the release of some unused space for Council-led housing in the potential site allocations adjacent to Oldfields Road and Kimpton Park Road (see Table 4.1, reference SB4).

Towards a Policy Approach for Sutton

34.14 Given the increasing pressure placed on open spaces in the borough, the emerging draft policy set out below continues to protect and enhance open space provision, including smaller open spaces of recreational and amenity value and/or public benefit.

34.15 In addition, some changes to the designation of some areas of Public Open Space and Urban Green Space are proposed to reflect the changes to the accessibility status (see Appendix 5, Schedules 5.E(ii), 5.F(ii) and 5.G(ii), and Maps 5.24a-b). In addition, some corrections are proposed (see Appendix 5, Schedules 5E-G), to amend some minor discrepancies in areas listed and some minor boundary amendments.

Towards a Policy Approach

34.16 Based upon the evidence and analysis, the Council considers that it can move directly towards a draft policy approach for consideration as part of this Regulation 18 consultation. The draft policy is as follows:

34.C Draft Policy 34 on Open Spaces

- (a) The Council will seek to retain the existing level of open space in the borough by:
 - (i) refusing development of all open space and play space in the borough, including Public Open Space and Urban Green Space identified on the Policies Map and

smaller areas of open space of recreational and amenity value not identified on the Policies Map, unless:

- (1) it can be demonstrated that such development would preserve or enhance its open character, its function as a sport, leisure or recreational resource, and its contribution to visual amenity and/or public benefit, or
 - (2) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in the local area.
- (ii) enhancing the supply of open space to meet the needs of the borough's growing population, by seeking on-site provision of publicly accessible open space, particularly in major new development in areas of deficiency.
 - (iii) supporting improvements, enhancements, and management that improve both quality and access to existing green spaces.
 - (iv) enhancing the role of Metropolitan Green Chains within the borough by protecting the open spaces within them from inappropriate development and improving walking and cycling linkages between them.
 - (v) working with partners and stakeholders to support and promote measures to help deliver the vision of the Wandle Valley Regional Park as a network of high quality, accessible and interconnected open spaces based around the River Wandle.
 - (vi) supporting new high quality outdoor sports facilities to promote sports and recreation across the borough.
 - (vii) promoting the multi-functional and shared use of existing open space for play and sports facilities and playing pitches, subject to satisfactory management arrangements being put in place.
 - (viii) resisting development on allotments, unless it can be demonstrated that:
 - (1) they are no longer needed to meet local demand.
 - (2) existing allotment users can be relocated to a new or existing allotment site within a reasonable distance of their homes.
- (b) The Council will encourage and support the provision of community-run and managed allotments and community food growing spaces in major new developments where practicable.
 - (c) The Council will safeguard sufficient land required to meet the borough's future need for burial space over the plan period.

34.D Regulation 18 Consultation Questions



- A. Do you agree with the draft policy on Open Spaces?
- B. Do you support the policy to protect smaller open spaces in addition to Public Open Space and Urban Green Space identified on the Policies Map?
- C. If you do not support the provisions of the draft policy, please give reasons and where possible suggest alternatives.

D. Do you agree with potential amendments to open space designations and boundary changes set out in Appendix 5, Schedules 5E-G and Maps 5.24a-b.

Issue 35 - Blue and Green Infrastructure

35.A Introduction

- 35.1** The important role of blue and green infrastructure in building healthy communities which are fully adapted and resilient to the impacts of climate change, promoting ecological pathways and biodiversity net gain (BNG) and enhancing quality of life is recognised in the NPPF (2023). Paragraph 159 states that new development should be planned for in ways that avoid increased vulnerability to the range of impacts arising from climate change and that when development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure.
- 35.2** Planning for blue and green infrastructure by incorporating soft landscaping, sustainable drainage (SuDS) measures, tree planting, green roofs and open water features as an integral part of new developments, can be highly effective in counteracting the urban heat island effect through evaporative cooling, shading and the inflow of cooler air. At the area-wide scale, permeating new developments with green space links connected to wider open space networks, river corridors and walking/ cycling routes can be even more effective.
- 35.3** Such urban greening measures can also bring about many other benefits including for wildlife habitats, BNG, healthy streets, reducing local air pollution, and enhancing local amenity. This is especially important within densely developed parts of the borough, such as Sutton Town Centre, or within extensive areas occupied by buildings and hardstanding such as strategic industrial locations (SILs) which are typically deficient in green infrastructure.
- 35.4** London Plan Policy G5 on 'Urban greening' requires that major developments should incorporate urban greening as a fundamental element of the layout and building design through measures such as high-quality landscaping, trees, green roofs, rain gardens and other nature-based SuDS measures. boroughs are encouraged to develop a green space factor in order to identify a minimum amount of green infrastructure required in new developments and this should be tailored to local circumstances. The ongoing management and maintenance of green infrastructure needs to be secured through the planning system as appropriate.
- 35.5** A review of green space factors¹⁶ developed in other cities undertaken on behalf of the Mayor as part of the evidence base for the London Plan 2021 concluded that where they have been adopted, GSF schemes have been shown to increase the amount of green space within developments. The Mayor subsequently introduced a generic Urban Greening Factor (UGF) for major developments under London Plan Policy G5.

¹⁶ the research report 'Urban Green Factor for London' prepared on behalf of the Mayor by the Ecology Consultancy Ltd in 2017 is available at https://www.london.gov.uk/sites/default/files/urban_greening_factor_for_london_final_report.pdf

35.B Context for Sutton

35.6 Arising from the Council's participation in the EU funded 'GRaBS' project (Green and Blue Space Adaptation for Urban Areas and Eco-Towns) between 2008-2011, the London Borough of Sutton has developed its own green space factor (GSF) scoring system. This was introduced for major developments through Policy 33 of the current Sutton Local Plan 2018 and the accompanying Technical Guidance Note.

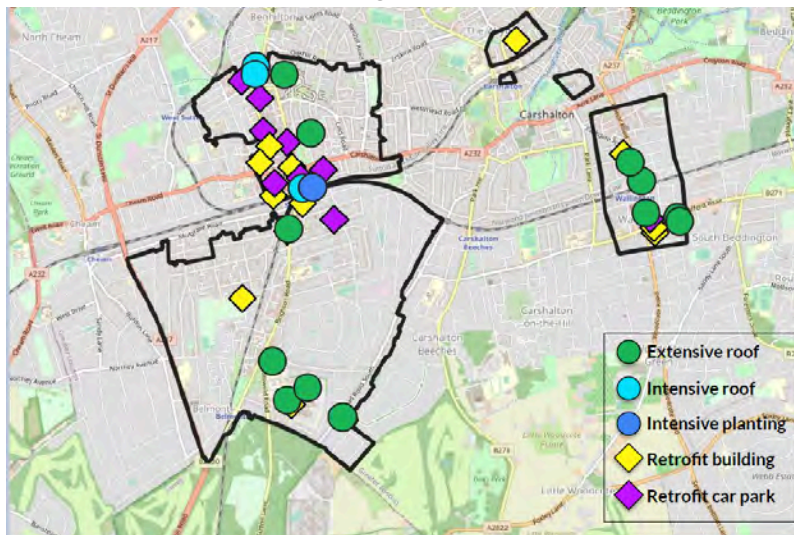
35.7 Based on a review of major planning permissions and completions within the borough (reported annually via the Authority Monitoring Report), the GSF system appears to be operating effectively within the borough with over 90% of developments meeting the minimum GSF score uplift of +0.2. It is therefore proposed to carry this system forward in place of the Mayor's UGF.

35.8 An analysis of green roof coverage and retrofit opportunities in Sutton Town Centre and Wallington undertaken by Gentian consultants in 2023 identified that there were:

- 16 existing green roofs occupying a total area of 8,569m² and split between 82% extensive, 18% intensive and 0.2% intensive planting;
- 15 paved or shingled buildings occupying a total area of 10,097m² that have a load-bearing capacity of at least 120 kg/m², and which could be immediately retrofitted with a green roof; and
- 9 multi-storey car parks occupying 46,644m² that have a load-bearing capacity of 500-1000 kg/m² and could be fitted with an intensive green roof.

35.9 Map 35.1 shows the location of green roof coverage and retrofit opportunities in Sutton Town Centre and Wallington based on this analysis.

Map 35.1: Green roofs and green roof retrofit opportunities in Sutton and Wallington



Gentian consultants on behalf of LB Sutton, 2023

Towards a Policy Approach

35.10 Based upon the evidence and analysis, the Council has established policy options for consideration as part of this Regulation 18 consultation. These are:

35.C Draft Policy 35 on Blue and Green Infrastructure

- (a) In seeking to build climate resilient communities, counteract the urban heat island effect and achieve multiple benefits for urban cooling, biodiversity net gain (BNG), SuDS, healthy streets, air quality and local amenity, all development proposals must incorporate urban greening measures as an integral part of the design and layout through measures such as, but not limited to, high-quality landscaping, planting, trees, biodiverse green roofs, rain gardens and other nature-based SuDS measures.
- (b) Where applicable, proposed developments must demonstrate an uplift in the Green Space Factor (GSF) score of at least +0.2 compared to the baseline score for the site. Proposed developments on greenfield sites must demonstrate a score of at least 0.5.

Options	Development types subject to GSF requirement in Part (b)
Preferred Option 1	Green space factor (GSF) requirement applies to all new-build residential developments creating at least one dwelling and all major commercial developments.
Option 2	GSF requirement applies to major residential and commercial developments only

- (c) All planning applications must be accompanied by a baseline assessment of the development site, GSF calculations and associated plans showing the breakdown of existing surface types, hard and soft landscaping, planting, trees and boundary treatments together with information and further GSF calculations to demonstrate how urban greening measures have been incorporated as part of the landscaping strategy in order to achieve the minimum GSF scores set out in Part (b) above, the relevant biodiversity net gain (BNG) objectives for the site (Issue 37 on Biodiversity Net Gain) and the Councils minimum SuDS performance standards set out in Policy Issue 45.
- (d) All proposed developments must incorporate a dry meadow extensive or semi-intensive biodiverse green roof where feasible or alternatively a blue roof. All planning applications which do not include a green must be supported by evidence to demonstrate why this is not technically feasible, commercially viable or consistent with accommodating on-site renewable energy in line with Local Plan Issue 42.

35.D Regulation 18 Consultation Questions



- A. Do you agree with the draft policy on Blue and Green Infrastructure?
- B. Do you support carrying forward the requirement for proposed developments to demonstrate an uplift in the Green Space Factor (GSF) score of at least +0.2 compared to the baseline score for the site and for . proposed developments on greenfield sites to achieve a score of at least 0.5?
- C. Do you support extending the GSF requirement to all new build residential developments creating at least one dwelling and to all major commercial developments in line with the Preferred Option?

Key supporting documents

- Urban Greening for Biodiversity Net Gain (GLA, 2021)
https://www.london.gov.uk/sites/default/files/urban_greening_and_bng_design_guide_march_2021.pdf
- Urban Greening supplementary planning guidance SPG (GLA 2023)
<https://www.london.gov.uk/sites/default/files/2023-02/London%20Plan%20Guidance%20-%20Urban%20Greening%20Factor.pdf>
- Statutory Biodiversity Metric 4.0 (DEFRA, 2023)
<https://www.gov.uk/government/publications/statutory-biodiversity-metric-tools-and-guides#:~:text=The%20statutory%20biodiversity%20metric%20tool,the%20statutory%20biodiversity%20metric%20tool.>
- BNG guidance (Natural England 2023)
<https://www.london.gov.uk/sites/default/files/2023-02/London%20Plan%20Guidance%20-%20Urban%20Greening%20Factor.pdf>

Issue 36 - Nature Conservation Sites and Green Corridors

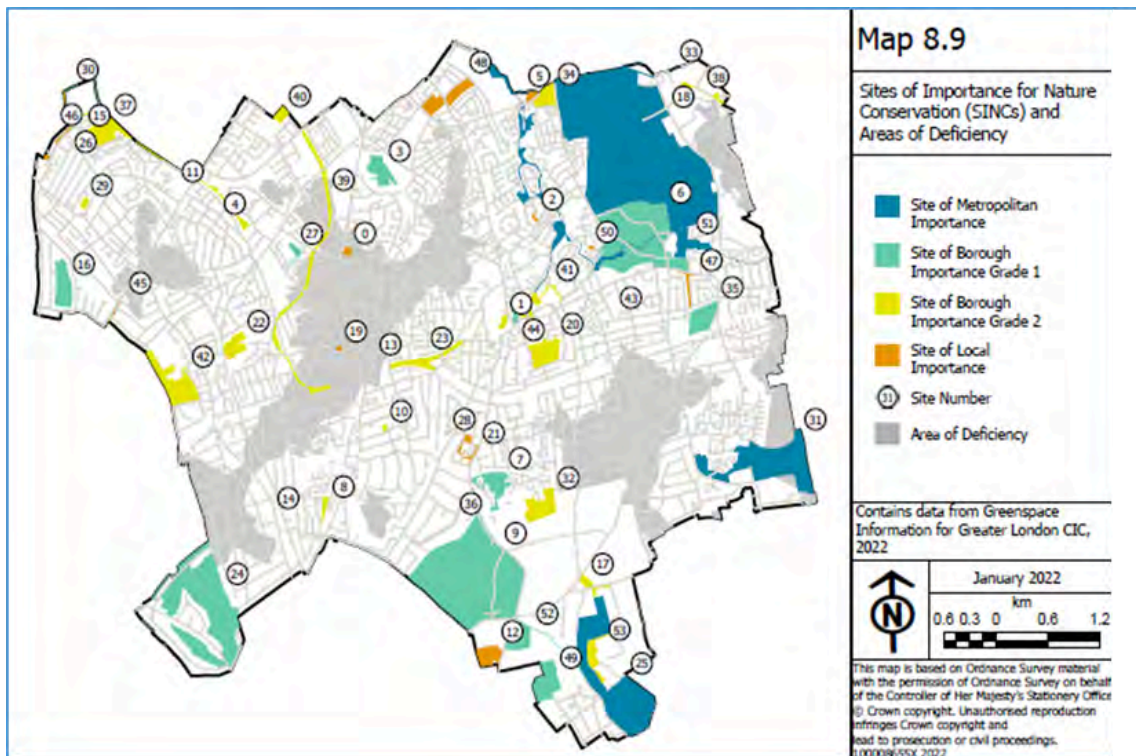
36.A Introduction

- 36.1** The NPPF (2023) requires that Local Plans should protect and enhance biodiversity by safeguarding local wildlife-rich habitats and wider ecological networks, including national and locally designated sites of importance for biodiversity (including designated Sites of Importance for Nature Conservation or SINCs); wildlife corridors that connect them; and areas identified for habitat management, enhancement, restoration or creation. If significant harm to biodiversity resulting from a development cannot be avoided, mitigated, or, as a last resort, compensated for, then planning permission should be refused.
- 36.2** Government PPG highlights the need for local planning authorities to work with local nature partnerships to protect and improve the natural environment based on local evidence and consider the opportunities that development proposals may provide to conserve and enhance biodiversity and wider ecological pathways. Local Plans should identify and map areas of value for nature conservation (i.e. SINCs) and include planning policies that not only secure their protection from harm or loss but also help to enhance them and their connection to wider ecological networks.
- 36.3** London Plan Policy G6 on 'Biodiversity and access to nature' states that SINCs should be protected and that Local Plans should use up-to-date information to identify SINCs, ecological corridors (i.e. green corridors) and coherent ecological networks. Boroughs should also identify areas of deficiency in access to nature (areas more than 1 km walking distance from an accessible SINC) and give positive consideration to developments which address them. Where harm to a SINC is unavoidable, and where the benefits of a development proposal clearly outweigh the adverse impacts on biodiversity, the following mitigation hierarchy should be applied (i) avoid damaging the significant ecological features of the site (ii) minimise the overall spatial impact and mitigate it by improving the quality or management of the rest of the site; and (iii) deliver off-site compensation of better biodiversity value.
- 36.4** Development proposals that are adjacent to or near SINCs or green corridors should consider any potential adverse impacts to the site and opportunities for enhancing their nature conservation value by providing complementary habitat, in line with London Plan Policy G6.

36.B Context for Sutton

- 36.5** There are 54 SINCs within the borough, including nine Grade 1 sites of Metropolitan Importance at the River Wandle; Poulter Park Riverside; Wandle Valley Hospital Wetland; Dale Park; Spencer Road Wetland; Wilderness Island; Beddington Farmlands; Roundshaw Downs; and Woodcote Park Golf Course. The location of SINCs and areas of deficiency (AoD) are shown in Map 36.1 below, produced on behalf of LB Sutton by Greenspace Information for Greater London (GiGL). AoD for nature conservation extend to 717 ha or 16.4% of the total area of the borough.

Map 36.1: Sites of Importance for Nature Conservation and Areas of Deficiency



Towards a Policy Approach

36.6 Based upon the evidence and analysis, the Council has established a series of policy principles for consideration as part of this Regulation 18 consultation. These are:

36.C Draft Policy 36 on Nature Conservation Sites and Green Corridors

- (a) Proposed developments that create, enhance or conserve biodiversity and habitats, create ecological pathways and/or reduce areas of deficiency will be encouraged subject to other local plan policies. In particular, the Council will support proposed developments that contribute towards urban greening objectives and borough targets for habitat creation set out in Local Plan Policy 6 on ‘Biodiversity and Habitats’, the Council’s Biodiversity Action Plan, Sutton’s emerging Local Nature Recovery Strategy and Catchment Plans for the River Wandle and Beverley Brook:
- (b) Proposed developments will not be permitted:
 - (i) Within, adjacent to or in the vicinity of a Site of Importance for Nature Conservation (SINC) where there would be an adverse impact on the nature conservation value or integrity of the SINC unless the need for or the benefits of the proposed development clearly outweigh the harm or there are no reasonable alternative sites that would result in less harm.
 - (ii) within or adjacent to a Green Corridor where there would be an adverse impact on its function both as an ecological pathway and as part of the borough’s wider green space network, unless the need for or the benefits of the development clearly outweigh the harm or there are no reasonable alternative sites that would result in less harm.
 - (iii) On back garden land where it is considered to be of local ecological value by the

- Council either individually or as part of a larger continuous street block; or
- (iv) Where it is likely to adversely affect the integrity or biodiversity value of the Banstead Downs SSSI (site of special scientific interest) adjacent to the London Borough of Sutton.

For SINIC boundaries and green corridors see the Local Plan Appendix 6 and Policies Map.

36.D Regulation 18 Consultation Questions



- A. Do you agree with the draft policy on Nature Conservation Sites and Green Corridors?
- B. If you do not support the provisions of the draft policy, please give reasons and where possible suggest alternatives.

Issue 37 - Biodiversity Net Gain

37.A Introduction

- 37.1** The Environment Act 2021 sets out an overarching ambition to halt species decline by 2030 and increase species abundance by the end of 2042. One of the Act's key provisions is the introduction of mandatory Biodiversity Net Gain (BNG) under which the majority of new developments must deliver at least a 10% net gain on the existing site baseline value for biodiversity, either on-site or off-site, or by buying statutory biodiversity credits as a last resort. BNG came into force from February 2024 for major developments and from April 2024 for smaller sites.
- 37.2** Accordingly, the NPPF requires that proposed developments should contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to climate impacts. Local Plans should promote the conservation, restoration and enhancement of priority habitats and ecological networks and pursue wider opportunities for securing measurable net gains.
- 37.3** In February 2024, the Government finalised the secondary legislation providing details of how BNG will operate accompanied by updated planning practice guidelines and guidelines for developers, including the preparation of BNG plans to the statutory biodiversity metric and credits. The Biodiversity Metric has been developed by Natural England in order to provide ecologists, developers, planners with a means of assessing changes in biodiversity value brought about by development or changes in land management. The Statutory Metric is mandatory for all developments, with some exceptions.
- 37.4** The Government's draft planning practice guidance (PPG) on BNG published in November 2023 confirms that, under the statutory framework for BNG, every grant of planning permission is deemed to have been granted subject to a 'general biodiversity gain' condition to secure the 10% objective through either on-site biodiversity gains, registered off-site biodiversity gains or statutory biodiversity credits. This condition requires developers to submit and approve a Biodiversity Gain Plan before the start of construction on site. This will ensure that:
- on-site biodiversity gains that have been identified through the development's approved plans and drawings are appropriately secured;
 - any off-site biodiversity gains have been registered and allocated to the development; and
 - biodiversity credits, if they are necessary, have been purchased.
- 37.5** Developers are encouraged to consider BNG from the earliest stages of project planning and design and to apply the Government's 'biodiversity gain hierarchy'. Accordingly, Government's PPG states that the following information must be provided as part of any planning application subject to a BNG condition:
- a statement as to whether the applicant believes that planning permission, if granted, would be subject to the biodiversity gain condition;
 - the pre-development biodiversity value of the on-site habitat including the completed metric calculation tool used and the publication date;

- where the applicant wishes to use an earlier date, the proposed earlier date and the reasons for proposing that date;
- a statement confirming whether the biodiversity value of the on-site habitat is lower on the date of application (or an earlier date) because of the carrying on of activities ('degradation') in which case the value is to be taken as immediately before the carrying on of the activities;
- a description of any irreplaceable habitat (as set out in the Biodiversity Gain Requirements (Irreplaceable Habitat) Regulations [2024]); and
- a plan showing on-site habitat existing on the date of application (or an earlier date), including any irreplaceable habitat.

37.6 Any river or stream lying within the boundaries of the application site, or within 10m of the boundary must be included for the purpose of calculating the % net gain.

37.7 London Plan Policy G6 on 'Biodiversity and access to nature' states that Local Plan policies should also support the protection and conservation of priority species and habitats that sit outside the network of SINCS and seek opportunities to create other habitats, or features such as artificial nest sites, that are of particular relevance and benefit in an urban context. Development proposals should manage impacts on biodiversity and aim to secure net BNG. This should be informed by the best available ecological information and addressed from the start of the development process. Mayoral guidance on BNG is currently under preparation.

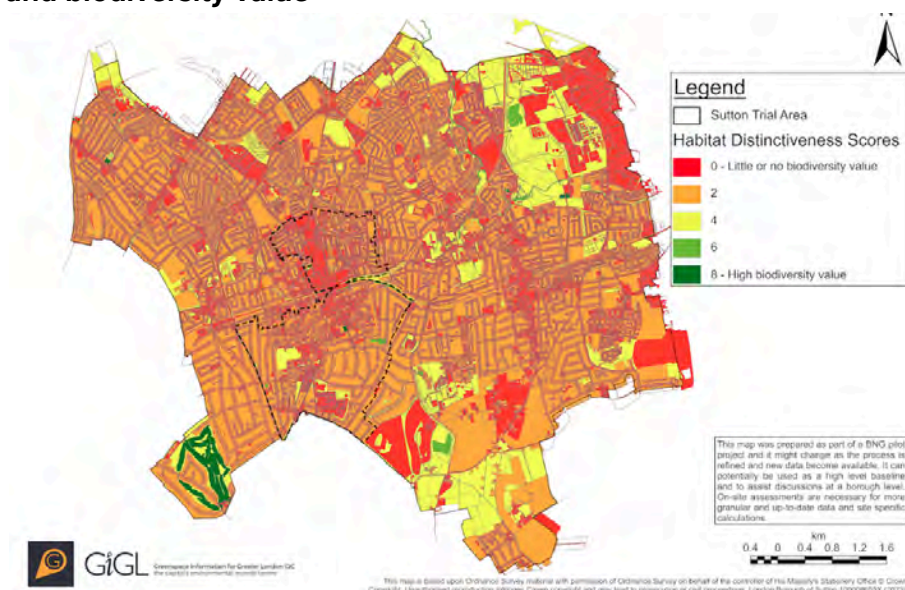
37.B Context for Sutton

BNG baseline for borough: Pilot project undertaken with Green Space Information for Greater London (GiGL) October 2023

37.8 In preparation for the introduction of mandatory BNG from February 2024, the London Borough of Sutton has worked with Green Space Information for Greater London (GiGL) and other partners to develop a better understanding of existing habitat types and biodiversity value across the borough, in terms of the extent, distinctiveness, condition, strategic significance and biodiversity units associated with each habitat. This pilot project was undertaken for the purpose of creating a high-level baseline for the whole borough as part of the Local Plan evidence base and to inform wider discussions on how BNG should be implemented in Sutton. However, on-site habitat assessments undertaken by appropriately qualified ecologists will be necessary in order to generate more granular and up to date baseline information for specific sites. This evidence base can then be used as a starting point for undertaking site-specific calculations and setting biodiversity targets for individual development sites (including emerging Local Plan site allocation) and possibly for wider areas of growth based on the Statutory Metric.

37.9 Map 37.1 shows the initial results of the pilot project. Key habitats across the borough, their distinctiveness, their condition and their associated biodiversity units are set out in Table 37.1. Total biodiversity units for the 4,461 ha surveyed are calculated as 7,556 as of October 2023. However it is expected that this baseline information will change over time as new data becomes available.

Map 371: LB Sutton BNG Pilot Project with Ground Truthing - Habitat distinctiveness and biodiversity value



Greenspace Information for Greater London (GiGL) on behalf of the Council (October 2023)

Table 371: Habitat distinctiveness, condition and biodiversity units in LB Sutton (GiGL)

Habitat Type	ha	%	Distinctiveness	Condition	Strategic Significance	Biodiversity Units
Arable and horticulture	45.4	1.0%	2	2	1	181.15
Broadleaf mixed and yew woodland	160.9	3.6%	4	2	1	1,286.27
Built linear features	564.0	0%	0	2	1	0.00
Built-up areas and gardens	2,469.7	55.4%	0	2	1	0.00
Coniferous woodland	1.21	0.03%	2	2	1	4.87
Dense scrub	26.4	0.6%	4	2	1	211.25
Fen marsh and swamp	0.32	0.01%	8	2	1	4.69
Grassland	84.5	1.9%	2	2	1	338.03
Intensive orchards	0.1	0%	2	2	1	0.36
Lowland calcareous grassld	6.5	0.2%	6	2	1	78.28
Lowland dry acid grassland	34.5	0.8%	8	2	1	552.17
Lowland meadows	2.0	0.04%	8	2	1	31.66
Modified grassland	338.7	7.6%	2	2	1	1354.97
Untranslatable habitat	126.7	2.8%	0	2	1	0.00
Unknown terrestrial veg	171.5	3.8%	0	2	1	0.00
Other lowland deciduous woodland	1.5	0.03	6	2	1	18.47
Other neutral grassland	375.1	8.4%	4	2	1	3000.91
Other woodland; mixed	20.6	0.5%	4	2	1	164.85
Rivers and streams	15.6	0.4%	6	2	1	187.71
Standing open water/stream	17.6	0.4%	4	2	1	140.78
Total	4,461	100%				7556.42

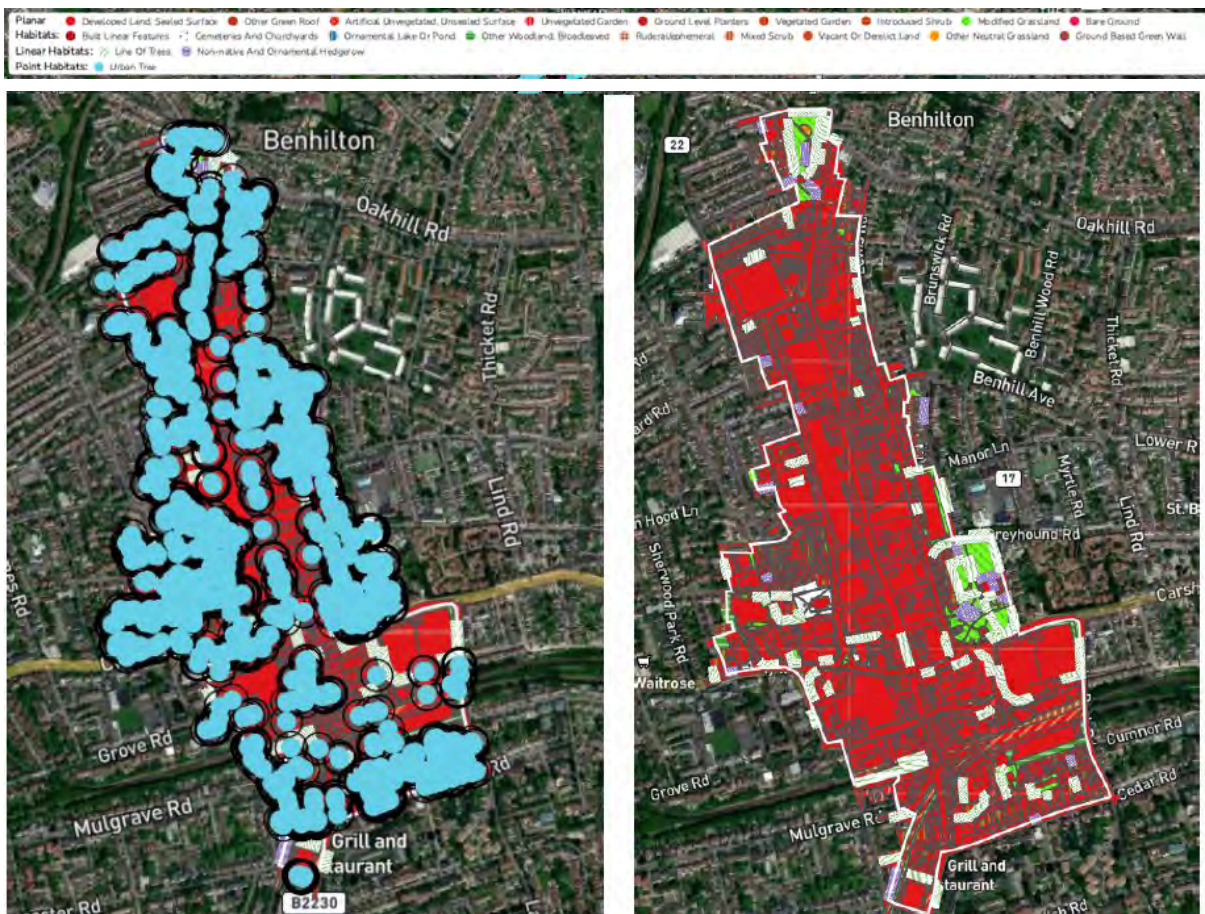
Source: Green Space Information for Greater London 2023 on half of LB Sutton October 2023

BNG baseline for Sutton Town Centre and Beddington Park: Intelligent Sustainability Management System (ISMS) operated by Ai-Dash Ltd

37.10 As discussed above under Local Plan Issue 6 on ‘Biodiversity and Habitats’, the Council is currently trialling an automated satellite-based system which can remotely map land coverage and habitats across the borough and calculate a baseline biodiversity value for any chosen development site and for wider areas. The system is designed to be used by developers and their ecologists in preparing BNG plans and to enable the delivery of BNG targets to be monitored over a period of 30 years.

37.11 As of April 2024, the Intelligent Sustainability Management System (ISMS) created by Ai-Dash Ltd has analysed habitat cover and biodiversity value for two trial areas within the borough, covering a total area of 330.8 ha. The initial outputs of this analysis for Sutton Town Centre (boundary) and for Beddington Park are shown in Map 37.2 and Table 37.2 respectively. It is intended to undertake further baseline assessments of emerging Local Plan Site Allocations, the Area of Potential Intensification (APIU) surrounding Sutton Town Centre and Strategic Industrial Locations (SIL) in the near future. Baseline biodiversity values generated by the Ai-Dash system may be used as the basis for setting long-term Local Plan targets for achieving an uplift in BNG for specific sites and for wider areas.

Map 37.2: Habitat areas and biodiversity units for Sutton Town Centre and Beddington Park based on ISMS trial (with and without tree locations)



Source: Ai-Dash Intelligent Sustainability Management System (ISMS), April 2024

Table 37.2: Habitat areas and biodiversity units for Sutton Town Centre (boundary only) and Beddington Park based on ISMS (exported from Ai-Dash portal)

Habitat Type	Sutton Town Centre (boundary)	Beddington Park
Habitat area (ha)	70.57	283.76
Biodiversity units	55.37	2.01K
Biodiversity Units per ha	0.78	7.12
Hedgerow length (km)	4.63	6.47
Hedgerow biodiversity unit	15.32	25.27
Hedgerow biodiversity units per km	3.31	3.91
Watercourse length (km)	0	10.51
Watercourse biodiversity units	0	80.1
Watercourse biodiversity units per km	0	7.62
Total biodiversity units	4,461.5	100%

Source: Ai-Dash Intelligent Sustainability Management System (ISMS), April 2024

Towards a Policy Approach

37.12 Based upon the evidence and analysis, the Council has established policy options for consideration as part of this Regulation 18 consultation. These are:

37.C Draft Policy 37 on Biodiversity Net Gain

- (a) In seeking to promote Biodiversity Net Gain (BNG), priority habitats and urban greening across the borough over the plan period in accordance with the national biodiversity net gain mandate; the aims of Sutton’s Nature Recovery Plan (when introduced) and Local Plan Issue 6 on ‘Biodiversity and Habitats’, all development proposals must demonstrate at least the targeted % net gain in biodiversity value based on the Statutory Metric unless the proposed development:
- (i) impacts less than 25m² of habitat or 5m of linear habitat on the existing site and does not impact a priority habitat;
 - (ii) is classified as self-build or custom build development consisting of no more than nine dwellings on a site no greater than 0.5 hectares (ha); or
 - (iii) is a residential extension or otherwise classified as householder development.

Policy Options

Option	Minimum BNG uplift target
Preferred Option 1	Set a 20% BNG target for all development sites within the borough.
Option 2	Set a 10% BNG target for all development sites within the borough.
Option 3	Set a 20% BNG target for development sites located in town centres and their surrounding areas of potential intensification (APIs) and within strategic industrial locations (SILs). Set a 10% BNG target for all other development sites within the remainder of the borough
Option 4	Where wider area-based BNG targets have been established by the Council in parts of the borough which are currently deficient or score zero

	biodiversity units (expressed in units per hectare), set the BNG site target accordingly in order to achieve the necessary uplift in biodiversity value
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- (b) All planning applications subject to the BNG requirement set out under part (a) must be accompanied by:
- (i) a statement as to whether the applicant believes that planning permission, if granted, would be subject to BNG;
 - (ii) the pre-development biodiversity value of the site based on the Statutory Metric including the completed calculation tool and the publication date; and
 - (iii) a plan showing on-site habitat existing on the date of submission including any irreplaceable habitat.
- (c) Where planning permission is granted, the Council will apply the standard biodiversity gain condition where relevant to require the submission and approval of a biodiversity gain plan prior to the commencement of the development. Biodiversity gain plans must:
- (i) include a completed calculation tool for the approved development based on the Statutory Metric demonstrating that the appropriate BNG target will be met;
 - (ii) demonstrate that the government's mitigation hierarchy and biodiversity gain hierarchy have been followed;
 - (iii) support the aims of Sutton's Nature Recovery Strategy, any approved area-based targets set for achieving an uplift in biodiversity value and urban greening and address deficiencies in access to nature conservation sites where feasible;
 - (iv) demonstrate how BNG and urban greening objectives have been incorporated as an integral part of the development from the earliest stages of project planning and design;
 - (v) ensure that soft landscaping schemes consist of at least 80% native and of local provenance (by number and species type), with the remainder wildlife-friendly species and provide both species and structural diversity, to maximise ecological niches; and
 - (vi) where it is not feasible to achieve the BNG target through on-site habitat creation, enhancement or restoration proposals, set out proposals in the following order of priority (a) deliver off-site habitat enhancements off-site on a borough site included on the national biodiversity gain sites register (b) make a financial contribution to a biodiversity tariff to be established by the Council; and (c) purchase statutory credits as a last resort and only if offsetting is not possible on Council owned land.
- (d) The Council will:
- (i) ensure that 'significant' on-site habitat creation, enhancement or restoration proposals are secured through a Section 106 agreement with the developer or via covenant in order to ensure compliance with the approved 'habitat values' set out in the submitted biodiversity gain plan and accompanying BNG calculations and site management over a period of 30 years;
 - (ii) assess biodiversity gain plans on a case-by-case basis to determine the 'best

ecological outcome’;

- (iii) prepare a supplementary plan and/or design codes containing further BNG guidance including details of Council-owned sites included on the national biodiversity gain sites register; any BNG tariff to be established by the Council, further ecological design advice and minimum standards for wildlife features, landscaping, urban greening and data provision; and
- (iv) monitor the delivery of BNG across the borough and report every 5 years.

37.D Regulation 18 Consultation Questions



- A. Do you agree with the draft policy on Biodiversity Net Gain?
- B. Which Option do you prefer (Options 1 - 4) and why?
- C. If you do not support the provisions of the draft policy, please give reasons and where possible suggest alternatives.

Biodiversity gain hierarchy

The biodiversity gain hierarchy, which is defined in Article 30a of the Development Management Procedure Order and the Government’s draft Planning Practice Guidance on BNG, requires Biodiversity Gain Plans to consider the following actions in order of priority:

- (i) avoid adverse effects of the development on on-site habitat with a habitat distinctiveness score, applied in the biodiversity metric, equal to or higher than six;
- (ii) so far as those adverse effects cannot be avoided, mitigating those effects;
- (iii) so far as those adverse effects cannot be mitigated, habitat enhancement of on-site habitat;
- (iv) so far as there cannot be that enhancement, creation of on-site habitat;
- (v) so far as there cannot be that creation, the availability of registered off-site biodiversity gain; and
- (vi) so far as that off-site habitat enhancement cannot be secured, purchasing biodiversity credits.

Mitigation hierarchy

The mitigation hierarchy consists of the following four stages:

- (i) Complete avoidance;
- (ii) Minimisation, where possible;
- (iii) Restoration of areas within the development;
- (iv) Offsetting, either on-site or off-site.

Issue 38 - Character and Design

38.A Introduction

- 38.1** The importance of respecting character and achieving the highest quality of design is embedded into the NPPF (2023), making it clear that good design is a key aspect of: sustainable development; creating better places in which to live and work; and helping make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. Local plans should set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable.
- 38.2** The NPPF also states that Councils should prepare design guides or codes consistent with the principles set out in the National Design Guide and National Model Design Code, and which reflect local character and design preferences. Design guides and codes provide a local framework for creating beautiful and distinctive places with a consistent and high quality standard of design. In addition, the NPPF (2023), includes guidance related to density, stating that significant uplifts in the average density of residential development may be inappropriate if the resulting built form would be wholly out of character with the existing area.
- 38.3** The London Plan (2021) places the emphasis on a design-led approach with good design being a key contributor towards good growth. Understanding the existing character and context of individual areas is essential in determining how different places may best develop in the future. An evaluation of the current characteristics of a place, how its past social, cultural, physical and environmental influences have shaped it and what the potential opportunities are for it to change will help inform an understanding of an area's capacity for growth and is crucial for ensuring that growth and development is inclusive.
- 38.4** The London Plan advocates the use of "area assessments", which should be used to define the characteristics, qualities and value of different places within the plan area to develop an understanding of different areas' capacity for growth. These requirements are set out in London Plan Policies D1 and D3.
- 38.5** In addition to these policies, the London Plan has published the Characterisation and Growth London Plan Guidance (LPG), to assist boroughs undertaking characterisation studies in support of local plans. The Council has used this guidance to develop its own Character Study, which is discussed below (and in Issue 13).
- 38.6** The emerging policy on 'Character and Design' aims to ensure that new development is well-designed and proposes sustainable capacities and densities to create high-quality places for our residents to live. It incorporates the requirements of the new London Plan for all sites to optimise their capacity through a design-led process. This will help to ensure that new development

creates attractive, liveable places that existing and future residents are proud to live in.

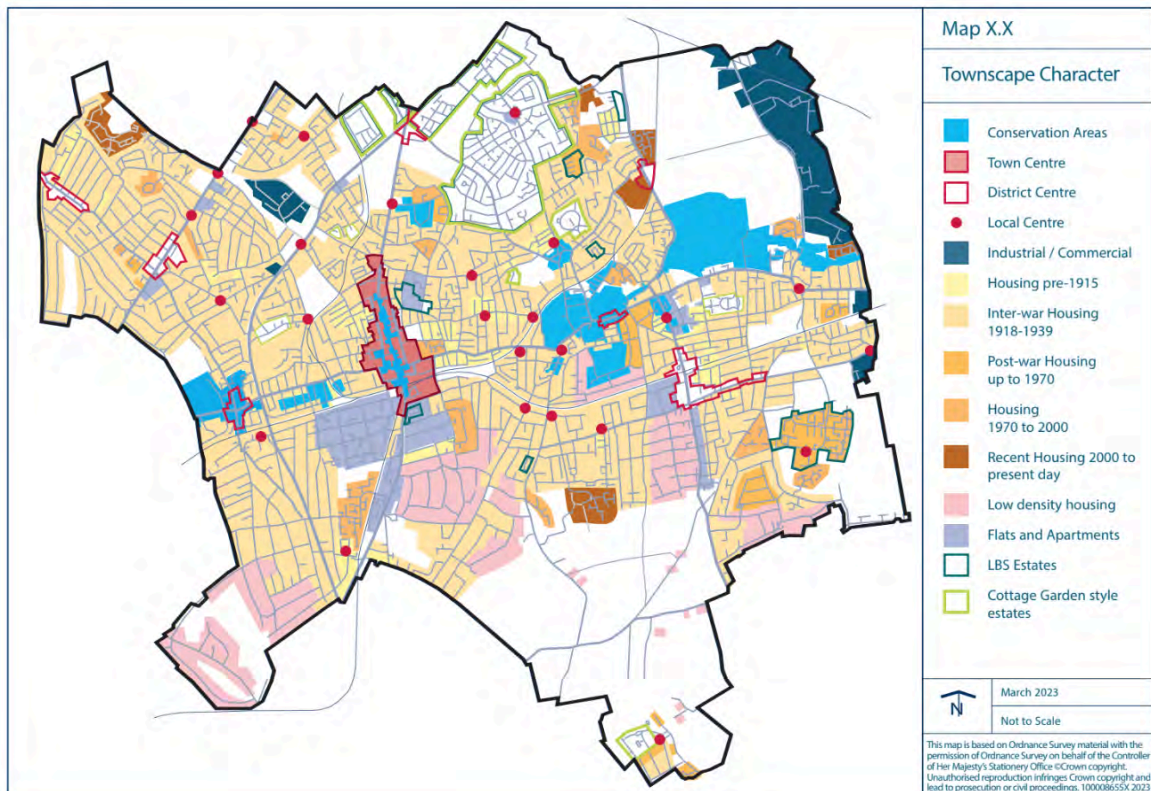
38.B Context for Sutton

Introduction to Sutton' Character

38.7 Since the borough began to be intensively developed when the railways arrived in the mid 1800s, a number of design styles have come and gone. The pre-1915 housing is characterised by two-storey terraces with small, walled front gardens or substantial properties with regimented building layouts and rich architectural detailing. The inter-war housing was typically built to long, straight streets and comprises short terraces or semi-detached two-storey houses. The streets are typically wide and front gardens have low boundary walls. Although the style appears uniform, in many cases, each property has different detailing.

38.8 Private post-war housing to 1970 is in relatively short supply and is often small infill sites. They tend to be semi-detached or terraced housing with small private gardens and are usually two-storey housing with plain brickwork. Post 1970, development has largely comprised the replacement of Victorian and Edwardian villas with blocks of flats, small infill development and large housing estate developments on former public sector brownfield land. The flats of the 1970s and 1980s were generally set in large plots but were not responsive to local character while the later flats are on smaller plots but have attempted to respect local character. The smaller infill sites have often been backland development and have contrived branching streets which jar with the grid layout of much of the borough.

Map 38.1: Townscape Character of LB Sutton

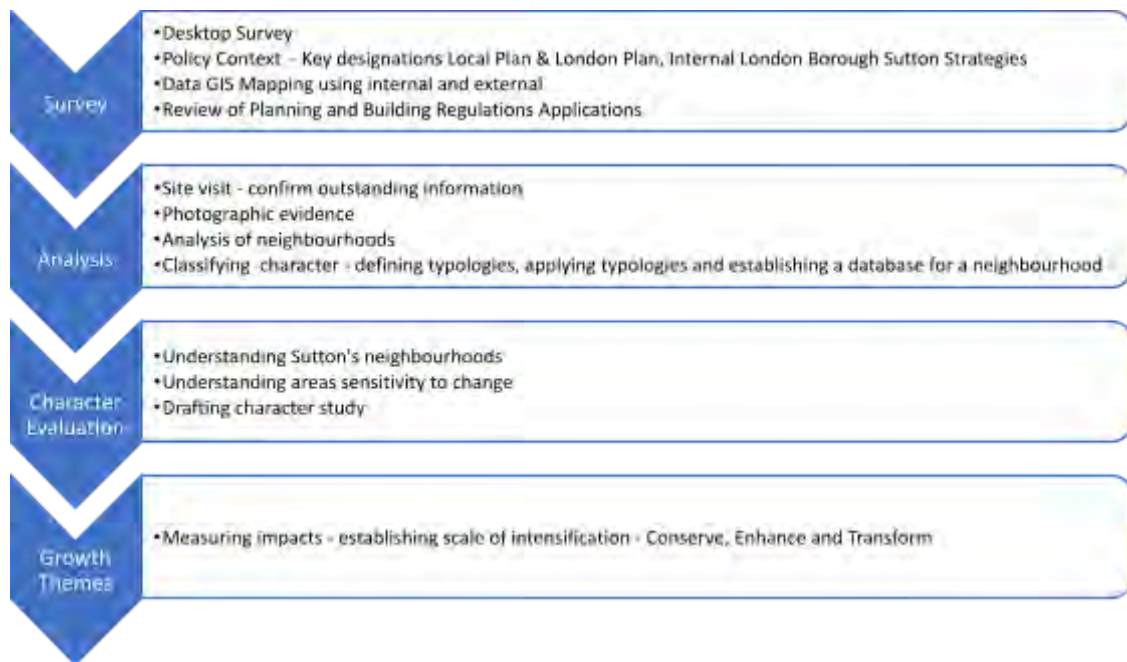


38.9 As a result of 150 years of development, Sutton is a borough with a varied suburban character, including the garden suburb of St Helier, the industrial villages of Beddington and Hackbridge, the rural villages of Carshalton and Cheam, the uniformly designed Worcester Park, all of which are interspersed with familiar London-style Victorian and Edwardian development and inter-war housing taking its cue from the Arts and Crafts movement. Consequently, any developer should firstly evaluate its surroundings and consider how they can incorporate appropriate elements into a new development.

Sutton’s Character Study (2024)

38.10 The impacts of growth and high density development can be mitigated by a respect of local character and high quality design. In terms of character, it is important that new development respects the character of Sutton. To support future policies on character and design, the Council has prepared a new Character Study, which forms part of the consultation material. This has followed the guidance in the Mayor’s Characterisation and Growth LPG and is also linked to the Council’s Tall Building Study. The approach taken is summarise in Figure 38.1 below:

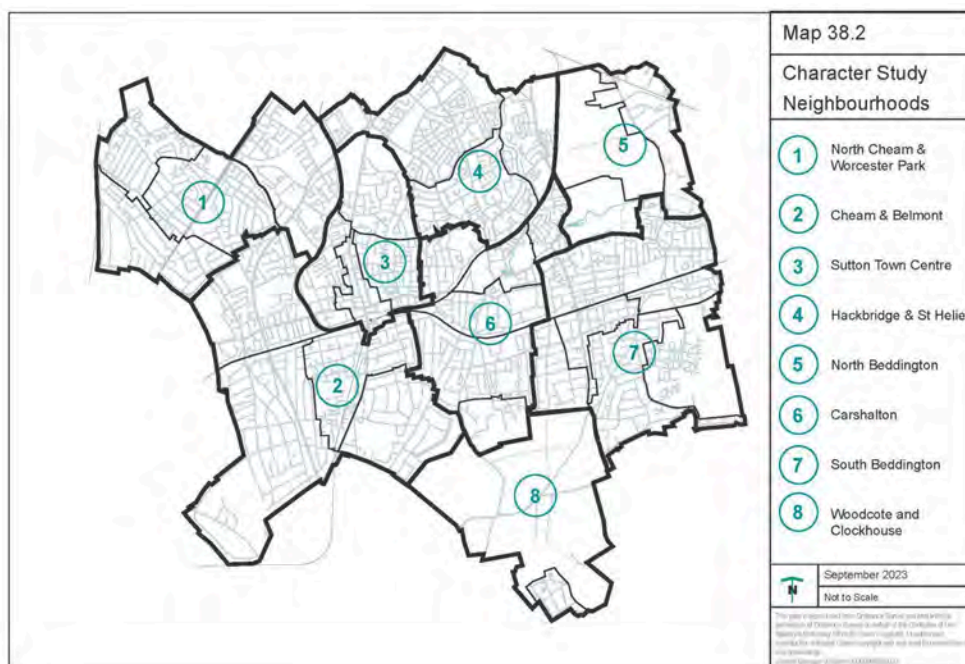
Figure 38.1: Sutton’s Character Study Methodology



Source: LB Sutton draft Character Study 2024

38.11 This study provides a starting point for understanding how a development site fits within the wider context of its surrounding neighbourhood and can help to determine positive elements of local character that can be accentuated through new development. The Study then takes a more granular approach and characterises the specific building typologies of small areas of the borough. It then assesses them for coherence, design quality and sensitivity to change, and determines their potential capacity for growth.

Map 38.2: Sutton's Character Study Neighbourhoods



Source: LB Sutton draft Character Study 2024

38.12 As set out in the GLA Characterisation and Design LPG, the capacity for growth or “growth themes”, is split into three categories: conserve; enhance, or transform. These are described in Table 38.1 below. It is important to note that, in some instances there will be overlap between these groups. For example, Sutton Town Centre, will fall within the ‘conserve’ category, in recognition of its conservation area, but also the ‘transform’ category too, as it is a designated metropolitan centre.

38.13 It is also important to note that the capacity for growth does not determine what development should be proposed on a site, and does not imply that there are areas where no development would be possible. Instead, it is a starting point for a design-led process, allowing for consideration of what would be the most appropriate form within each area.

Table 38.1: Characterisation Study Growth Themes

Growth Theme	Description
Conserve	<p>Conserve, a very limited amount of intervention is needed to improve character. Priorities will be to conserve - re-use or protect buildings or spaces. Identifies areas that should be protected, to conserve the existing heritage and character in the built and natural environment.</p> <p>All interventions should be sensitive and shaped by the context of the area. These areas have a high quality, well established and coherent character that is sensitive to change.</p>

Enhancement	<p>Identifies those areas that are in need of sensitive improvement and enhancement. Intervention will still consider the character of an area, but includes areas able to accommodate more intensification. Priorities will require investment, for example improvements to the public realm, better pedestrian and cycle routes, sensitive infill development, protecting and encouraging specific uses.</p> <p>These areas have a mixed character that would benefit from improvement through appropriate intervention.</p>
Transform	<p>Highlights the most appropriate opportunities for growth, or a new way forward to maximise the potential of that sub - area. Most amount of intensification and investment, additional housing, commercial or retail development within a sub-area. This focuses on the outcome of the Character Study, outlining the interventions needed by the Council and developers to bring forward the full potential of the area.</p> <p>These areas that have an inconsistent/mixed character and/or where an opportunity exists to establish a new coherent character by enhancing positive elements.</p>

38.14 To further support the draft Character Study, the growth themes, and the policies in the final Local Plan, the Council will produce a Design Code following adoption of the Local Plan. In addition, the Council will continue to support Design Review Panels, which provide independent advice on design issues relating to new development schemes and proposals for public spaces, including major planning applications and pre-application development proposals.

Creating Individual Character and Design, Statement Buildings and Contemporary Design

38.15 On large sites, it is possible for a development to create its own character and design. However, while it is important to create an individual character on these sites, it should not contrast discordantly with the surrounding area which adjoins it. There is a place for statement buildings in the borough but developers should carefully consider whether the site is appropriate for such a building. Like statement buildings, there is a place for contemporary design but, once again, developers should consider carefully whether the site is appropriate for such a design. On smaller sites, particularly in more suburban locations, the prevailing character in the vicinity of the site should have a greater influence on the design of the scheme.

Public Realm

38.16 The quality of the public realm, the streets and spaces between buildings, has a significant influence on the quality of a place. For this reason, the public realm, and the buildings that frame those spaces, should be attractive, accessible, designed for people and contribute to the highest possible standards of comfort, security and ease of movement.

38.17 In 2020, the Council approved the ‘Sutton Town Centre Public Realm Design Guidance Supplementary Planning Document (SPD)’ to ensure that changes to the public realm arising from new development or public works is to the highest design standard and reflect a consistent approach to prevent a “patchwork quilt” effect. This incorporates the TfL’s Healthy Streets principles, which public realm proposals should accord with. The requirements of this SPD should be taken into account when proposals come forward that would impact on the existing or proposed public realm.

Trees and Landscaping

38.18 Trees and landscaping are an invaluable asset for Sutton, from both an environmental and visual perspective. They provide greenery and shade, support biodiversity, improve air quality and add to the character of a place. The importance of trees and landscaping is recognised in the NPPF and the London Plan, with an emphasis on ensuring that high quality landscaping and trees are a fundamental element of design.

38.19 It is therefore vital that trees and landscaping are provided in new development schemes and that existing landscaping and trees are protected on or near development sites.

Advertisements

38.20 The term "advertisement" covers a very wide range of advertisements and signs, including hoardings, illumination of hoardings, illuminated fascia signs, free-standing display panels, and estate agent boards. Some advertisements are not regulated by the Council and others benefit from "deemed consent", which means permission is not needed; this will depend on the size, position and illumination of the advert. Other advertisements will always need consent.

38.21 The control of signs and advertisements is important as they can have significant impacts on the quality and appearance of the street scene and upon the building on which they are displayed. In particular, the architectural merit of individual buildings and groups of buildings may be damaged by insensitive advertisements. As such, careful consideration will be given to the size, location, materials, details, and method of illumination of proposed signs and advertisements together with the impact they will have on the architectural features of the building upon which they are fixed.

38.22 Externally illuminated signs are preferable in all circumstances, particularly where the lighting element is well integrated with the sign. Internally illuminated signs will not be permitted within Conservation Areas or on listed buildings unless it is demonstrated to the satisfaction of the Council that the design complements the character of the Conservation Area and/or does not harm the significance of the listed building.

Tall Buildings

38.23 Whilst generally new development should respect the scale of its context, there are cases where buildings that are taller than the surrounding area would be

acceptable. As well as one approach to achieving higher density, taller buildings can be used for place-making purposes, to create iconic buildings, to create landmarks and contribute to wayfinding. Further details can be found under Issue 39 on tall buildings.

Towards a Policy Approach

38.24 Based upon the evidence and analysis, the Council considers that it can move directly towards a draft policy approach for consideration as part of this Regulation 18 consultation. The draft policy is as follows::

38.C Draft Policy 38 on Character and Design

Design-led approach to Development

- (a) The Council will support development proposals that are design-led and respond to a site's character and context. All development proposals should demonstrate how the proposed capacity of the development has been informed by:
 - (i) a design-led approach that optimises the capacity of sites and ensures that development is of the most appropriate form and land use for the site.
 - (ii) the Council's Character Study.
 - (iii) the form and layout of the site, within its context, including appropriate scale, height and massing;
 - (iv) the requirements of London Plan Policy D1 and D3.

General Design Principles

- (b) The Council will grant planning permission for new development, including new buildings, alterations and extensions, provided the new development:
 - (i) Is attractive, designed to the highest standard, especially with regard to architectural detailing, and uses high-quality materials;
 - (ii) Respects the local context and responds to local character and heritage assets;
 - (iii) Is of a suitable scale, massing and height to the setting and context of the site and/or townscape and adequately preserves or enhances the prevailing local character;
 - (iv) Would not create canyon-like development, with no relief or set backs, especially along streets;
 - (v) Seeks to improve an area of poor townscape character;
 - (vi) Makes a positive contribution to the street frontage, streetscene and / or public realm, including the provision and maximisation of active frontages where appropriate;
 - (vii) Is inclusive and accessible for all and improves movement through areas with direct and clear routes to deliver and facilitate high quality placemaking;
 - (viii) Is secure and designed to minimise crime and anti-social behaviour;
 - (ix) Is robust and flexible in use;
 - (x) Responds to natural features and retains trees, hedges and other landscape features and spaces of amenity value, where possible;
 - (xi) Promotes sustainable travel and, where possible is not dominated by car and cycle parking;
 - (xii) Creates attractive, functional and clearly defined public and private spaces;

- (xiii) Protects important local views and creates new ones wherever possible;
 - (xiv) Successfully delivers building services and operating facilities and equipment subtly within the design;
 - (xv) Seeks to introduce public art in town centres and as part of large-scale redevelopment schemes, where appropriate;
 - (xvi) Designs any vehicular access, parking (particularly in undercrofts or basements) or servicing to be safe and well-related to the users of the site and wider adjacent area, not prejudice or preclude active frontages, minimise impact on amenity and be visually attractive;
 - (xvii) Does not prejudice the optimum future development of, or access to, adjoining plots by omitting openings on party walls and avoiding direct overlooking, unacceptable overshadowing or undue sense of enclosure;
 - (xviii) Maintains the setting and visual amenity of the Green Belt, Metropolitan Open Land, Public Open Space and Urban Green Space.
- (c) Opportunities for the removal of poor townscape and its replacement by development of an improved quality and scale will be pursued.

Public Realm

- (d) Public Realm proposals will be supported that provide:
- (i) the most effective use of the site;
 - (ii) safe, attractive, uncluttered, co-ordinated public realm that enhances the setting of and spaces between buildings;
 - (iii) improved legibility, permeability and convenient access via direct routes for all users (but avoiding alleyways and back lanes);
 - (iv) new or enhanced public space and green infrastructure;
 - (v) climate change adaptation measures such as sustainable urban drainage systems, urban shading and heat reduction measures;
 - (vi) good-quality construction materials and landscape design which is appropriate for its site and immediate locality;
 - (vii) for the removal of redundant or unsightly street furniture/clutter;
 - (viii) modestly-sized infrastructure cabinets in unobtrusive locations and places them below ground in conservation areas and adjacent to heritage assets;
 - (ix) pedestrian and cycle-priority shared environments which are not dominated by vehicles whether moving or parked;
 - (x) retains and enhances the heritage value of existing spaces.

Landscaping and Trees

- (e) New development, where appropriate, should:
- (i) Make provision for suitable new planting, trees and boundary treatments, taking into account the future effects of climate change. The requirements and layout of new tree planting and soft landscaping should be fully considered at the design stage and not be viewed as secondary to the built elements of development.
 - (ii) Incorporate well-designed soft and hard landscaping, which demonstrates the delivery of ecological services and achieves the multiple linked Policies requirements

of Urban Greening and Climate Change, Biodiversity, Flood Risk, SUDs and Overheating and Cooling.

- (f) Where trees are present on a proposed development site:
- (i) An arboricultural assessment should be submitted alongside the planning application which makes provision for the retention of existing trees, recognising their amenity contribution and those that are important by virtue of their significance within the local landscape.
 - (ii) Their significance may be as a result of their size, form and maturity, or because they are rare or unusual. Significant trees are typically those identified as being of a high and moderate value when assessed under the criteria of British Standard - BS-5837(2012) ('A' and 'B' retention category). If their loss is proposed as part of development, their value should be quantified and it must be demonstrated that a suitable level of mitigation is achieved, to surpass any impacts on landscape amenity. Younger or lower value trees (BS-5837 'C' retention category), that have the potential to add significant value to the landscape character in the future should also be retained where possible.
 - (iii) The retention should be reflected in the proposed development layout, allowing sufficient space for new and young trees to grow to maturity, both above and below ground. Adequate clearance from existing trees should be given to avoid future impacts, particularly in relation to residential dwellings and amenity space.
 - (iv) Where existing trees are felled prior to permission for development being sought, the Council may require replacement planting as part of any permission granted.
 - (v) The Council will require compliance with latest arboricultural or silvicultural standards in respect of any tree works or development near to trees.
 - (vi) The type and quantity of trees should also be considered with regard to a changing climate and the need to provide mitigation for that change.

Advertisements

- (g) The Council will not grant permission for advertisements that are detrimental to the visual quality of the borough or do not meet highway safety requirements. In particular, advertisements must respect the design of the building on which they are erected and the character and amenity of the surrounding area.

All development will also be expected to comply with the guidance set out in the Council's Urban Design Guide SPD, Sutton Town Centre Public Realm Design Guide SPD or any successor document, including design codes.

38.D Regulation 18 Consultation Questions



- A. Do you agree with the Council's draft policy on Character and Design?
- B. Are there any alternatives you could suggest?
- C. Where possible, please give reasons for your answer above.

Issue 39 - Tall Buildings

39.A Introduction

What is a Tall Building?

39.1 Whilst there is a nationally recognised definition of ‘tall building’, what might be considered tall will be subjective to the characteristics and nature of the local context. The national ‘Guidance Notes for Design Codes’ defines a tall building as a ‘structure that exceeds the general height guidance for a particular area type. Conversely, the London Plan (2021) requires local authorities to define what is tall based on the local context. However, where this context is absent, London Plan Policy D9 sets a minimum height threshold of at least 6 storeys or 18 metres.

How do you measure Tall Buildings?

39.2 Building heights can be understood in either metres or as storeys. Whilst storeys are easier to measure and understand, floor to ceiling height varies between buildings, depending on their use and roofscape. For example, measuring in storeys could be more problematic for retail centres such as shopping centres or supermarkets with multi-storey car parks, or historic buildings such as churches. It is important to therefore understand building heights in both storeys and metres. Table 39.1 provides an understanding of height in storeys, the equivalence in metres, and the context in which these buildings will be found.

Table 39.1: Buildings Heights in Metres and Storeys




HEIGHT	EQUIVALENT APPROXIMATE RESIDENTIAL STOREY HEIGHTS	CONTEXT
3 - 6m	1 storey	Low scale
>6 - 9m	2 storeys	Domestic scale, likely found in suburban locations
>9-12m	3 storeys	Could include some suburban areas, where large homes are located, and local centres
>12-15m	4 storeys	Urban scale around district centres
>15-18m	5 storeys	Urban scale, found in some district centres but predominantly more intense urban in the Town Centre
>18-21m	6 storeys	High density urban development, this is located predominantly in the town centre and a few district centres, and is regarded the minimum threshold definition of tall
>21-24m	7 storeys	High density urban development, found predominantly in the town centre
>24-27m	8 storeys	High density urban development, located within the town Centre
>27-30m	9 storeys	Very high density urban development
>30-33m	10 storeys	Very tall buildings
>33-48m	11-15 storeys	High rise cluster
>48m+	16 storeys +	High rise cluster

Definition of tall ←

39.3 Table 39.2 below usefully illustrates how the height in metres varies between different uses with the same number of stories. For example, a typical 10 storey office building will be more than 10 metres taller than a typical 10 storey residential building.

Table 39.2: Buildings Heights of Different Uses in Storeys and Metres

STOREYS	MINIMUM RESIDENTIAL BUILDING STOREY HEIGHTS (M)	TYPICAL RESIDENTIAL BUILDING STOREY HEIGHTS (M)	TYPICAL MIXED-USE BUILDING STOREY HEIGHTS (M)	BLENDED PROSPECTIVE STOREY HEIGHTS (M)	TYPICAL OFFICE BUILDING STOREY HEIGHTS (M)
1	3.00	3.15	4.00	3.30	4.50
2	6.00	6.30	7.15	6.60	8.50
3	9.00	9.45	10.30	9.90	12.50
4	12.00	12.60	13.45	13.20	16.50
5	15.00	15.75	16.60	16.50	20.50
6	18.00	18.90	19.75	19.80	24.50
7	21.00	22.05	22.90	21.10	28.50
8	24.00	25.20	26.05	25.40	32.50
9	27.00	28.35	29.20	29.70	36.50
10	30.00	31.50	32.35	33.00	40.50

 Building beneath the default London Plan tall building threshold of 21m
 Default tall building threshold exceeded in which storeys across different building types
 Building above the default London Plan tall building threshold of 21m

39.B Context for Sutton

39.4 Sutton is a borough of relatively low density development and, with the exceptions of parts of Sutton Town Centre, few tall buildings when compared to other parts of London. Whilst generally new development should respect the scale of its context, there are cases where buildings that are taller than the surrounding area would be acceptable. In the right locations tall buildings can make important contributions towards delivering new homes, economic growth and regeneration. Furthermore, taller buildings can be used for place-making purposes, to create iconic buildings, to create landmarks and contribute to wayfinding. Therefore, it is important to provide a guide to appropriate building heights within the borough.

39.5 The Adopted Local Plan (2018) defines tall buildings as those with 4 storeys or more. This was broken down into the following three categories: Mid-rise - 4 to 6 storeys; Tall - 7 to 10 storeys; and Very Tall - 10 storeys+

39.6 These above categories were applicable to Areas of Taller Building Potential that were identified in Sutton Town Centre and the seven district centres.

39.7 In support of the local plan preparation, the Council commissioned a Tall Building Study to: define tall buildings in a Sutton context; identify areas where tall

buildings are suitable; set out what appropriate heights would be in these locations; and offer advice for the development of tall building policies.

What is a Tall Building in Sutton?

- 39.8** The first part of the policy seeks to define the Council's definition of a tall building based on local evidence which reflects the predominantly low-rise and suburban character of large parts of the borough. The use of a single definition of a tall building provides an approach which is simple and easy to understand for both local communities and applicants, and which provides certainty as to how the Council will implement the policy.
- 39.9** The definition of a tall building in Sutton will be a building that is 21 metres or more in height when measured from the ground to the top most part of the building. Sites that are above this height will need to meet the remaining requirements of this policy, even when they are in locations identified as suitable for tall buildings under part 2 of the policy. When stating the height of a tall building as part of an application, in addition to the storey height, this should be described in metres.
- 39.10** Buildings which do not fall within this definition of a tall building but are 12 to 21 metres from the ground level to the top of the building will be considered to be mid-rise buildings.

Where should Tall Buildings be located in Sutton?

- 39.11** The second part of the policy sets out the approach to the location of tall buildings. Tall buildings will only be an acceptable form of development in the 'areas of taller building potential', which will be defined on the Policies Map and as identified by the tall building maps included at Appendix 7 to this Plan. This policy sets out maximum heights for tall buildings across the borough.
- 39.12** However, whilst a site may be located in an Area of Taller Building Potential, it does not mean that the maximum possible height will be acceptable. Precise heights will still need to be considered on a site-by-site basis, and each proposal will be assessed on its own merits – in some instances it may be appropriate to build up to the maximum possible height, but in other places a lower height may be required for a number of reasons (including, but not limited to, elements such as microclimate, daylight/sunlight impacts, heritage impacts, provision of on site amenity areas and townscape impacts). In all cases, the height that is proposed on a particular site should be the one that is demonstrated by a design-led process to be the most appropriate for the context.
- 39.13** Tall buildings should vary in height, so as to not present a 'wall' of development, and to avoid negative impacts on daylight, sunlight, overlooking, and microclimates. Tall buildings within a group should be carefully positioned so that sky views can be experienced from street level and so that tall buildings do not have an overbearing impact on streets and spaces within the area. This designation also does not preclude other forms of development. In Areas of Taller Building Potential, high density mid-rise or mansion-block style development may also be acceptable. Outside Areas of Taller Building Potential, there is no presumption in favour of tall buildings.

Apex Buildings

39.14 The Tall Building Study introduces the concept of ‘apex’ buildings. Apex buildings are existing or potential buildings which represent local high points and are higher than those buildings that immediately surround them. There are already some existing apex buildings within the Sutton Town Centre, such as Sutton Point and Quadrant House. Apex buildings occupy prominent locations and act as landmarks, assisting with wayfinding and play an important role in establishing urban identity.

39.15 Whilst apex should be taller than their surroundings, the position and orientation of an apex building must be particularly sensitive to its surroundings, should be of the highest architectural quality and they must deliver exemplary design quality given their prominence. The Local Plan Appendix 7, Maps 7.1a and 7.8a identifies locations where apex buildings may be appropriate.

Public Benefit and Affordable Housing

39.16 The third part of the draft policy would require tall building proposals to demonstrate how they provide significant public benefits to justify their development. Tall buildings and increased densities can be positive, but they are not inherently so; they have to be accompanied by the public benefits that denser, taller buildings can unlock.

39.17 The design criteria in this policy set out the circumstances in which tall buildings will be considered acceptable from a design perspective. However, to be considered acceptable in the overall planning balance, where the potential negative impacts of taller buildings are considered against the benefits they bring, they must provide a significant proportion of the affordable housing that the borough so urgently needs. As such, tall building proposals must meet or exceed the affordable housing target that will be set out in the final affordable housing policy (Issue 14), and provide a suitable mix of unit sizes (Issue 16), including family homes, to meet the identified needs of the borough. Proposals for tall buildings that do not meet this threshold will not be supported.

Tall Building Design Criteria

39.18 Part four of the emerging policy sets out a number of design criteria against which tall building proposals will be assessed. This is to ensure that when tall buildings are built, they make a positive contribution to the surrounding context and public realm in which they are located, and to the wider townscape and skyline of Sutton.

39.19 There are a number of health and well-being considerations with high density development, including: space for children to play and socialise; sense of community; adequate space for domestic tasks; home working; a lack of flexibility and storage space in layouts; and problems relating to daylight, overheating, privacy, noise, and wind. However, while poorly-designed tall buildings can exacerbate these problems, well-designed tall buildings can provide high-quality housing that encourages health and well-being. As such, tall buildings should be designed in a way that promotes the health and well-being of all their residents, as well as those who live in the surrounding area.

- 39.20** The design criteria will guide the development of tall buildings in Sutton. In order to enable assessment against the criteria, the Council considers that proposals should be accompanied by accurate visual representations within the design and access statement showing the impacts of the proposal in near, middle and distant views, including the public realm and its appearance at street level. The views to be included should be discussed as part of the pre-application process. Major and strategic development proposals should be accompanied by a 3D model of the proposed development in, ideally provided at pre-application process as well as application stage, to allow officers to assess potential viewpoints.
- 39.21** Due to their visual prominence, it is important that tall buildings are of exemplar design. Tall buildings can be considered in three parts – the base, middle, and top – and the architecture of tall buildings should articulate these three parts effectively. The base comprises the lower storeys of the building and its role is to frame the street or public space, clearly present the entrance to the building, and provide active frontages. The middle is the main tower element and largely determines the prominence of the building, and its effect on neighbouring amenity and microclimate. The top includes the uppermost storeys, roof and roof equipment. Visually prominent plant, building maintenance units and/or antennae at the top of a building detract from the visual appearance of the building. The Council will expect such equipment should be appropriately concealed as part of the architectural design.
- 39.22** Proposals involving tall buildings will need to demonstrate how any adverse impacts on the microclimate will be mitigated in relation to wind, overshadowing, daylight and sunlight, solar glare, and light pollution. Buildings over 21 metres in height and/ or substantially taller than surrounding buildings must be tested against Lawson criteria in relation to wind. Specific details on the required mitigation measures must be provided, including where and how these measures will be implemented. It must be ensured that all mitigation measures proposed and tested in the wind microclimate assessment are proposed within the relevant planning documents.
- 39.23** One particular issue that tall buildings in Sutton Town Centre will need to take into account is the Sutton Town Centre Conservation Area, particularly the low-rise, ‘human scale’ of the High Street itself. Proposals for tall buildings adjacent to Sutton High Street will be expected to be set back from any High Street frontage to preserve this ‘human scale’. Any development that adjoins the High Street frontage must be of a scale and height of neighbouring properties, which are predominately 2 to 4 storeys in height. Buildings with a High Street frontage will not be permitted where they are taller than neighbouring properties.

Towards a Policy Approach

- 39.24** Based upon the evidence and analysis, the Council considers that it can move directly towards a draft policy approach for consideration as part of this Regulation 18 consultation. The draft policy is as follows:

39.C Draft Policy 39 on Tall Buildings

Definition of Tall Buildings in Sutton

- (a) Buildings which are 21 metres or more, from the ground level to the uppermost part of the building are defined as tall buildings in Sutton.

Appropriate Locations for Tall Buildings

- (b) Proposals for tall buildings, as defined in part (a), will only be appropriate in Areas of Taller Building Potential, as defined in the Local Plan Appendix and Policies Map, where the development would not result in any adverse visual, functional, environmental, and cumulative impacts.
- (c) Proposals for tall buildings outside the Areas of Taller Building Potential will not be supported.

Appropriate Heights for Tall Buildings

- (d) Proposals for tall buildings should not exceed the appropriate height range identified for each of the Areas of Taller Building Potential as defined in the Local Plan Appendix and Policies Map or relevant Site Allocation.
- (e) Proposals for tall buildings must take into account:
 - (i) the need for variation in heights within a particular development proposal and across different development proposals within an area.
 - (ii) the need to avoid harm to the significance of heritage assets, particularly the impact that tall building would have on the Sutton Town Centre Conservation Area. Buildings that have a High Street frontage must be of a similar height to neighbouring properties to preserve the 'human scale' on the High Street.
 - (iii) the need to avoid harm to the areas of ecological importance, or the enjoyment of the borough's open spaces.
 - (iv) impacts on daylight, sunlight, and overshadowing for neighbouring developments.
 - (v) the need to maintain sky views from street level from within clusters of tall buildings.

Public Benefits and Affordable Housing

- (f) All proposals for tall buildings must demonstrate how they provide significant public benefits, and in particular must meet the affordable housing requirements set out in the affordable housing policy, currently set out under Issue 14.

Tall Building Design Criteria

- (g) Proposals for tall buildings will be supported where it is demonstrated that they meet the following design criteria:
 - (i) Be of a height, scale, mass, volume, and orientation that is proportionate to its role and function and takes into account the character of the immediate context and its surroundings.
 - (ii) Achieve exemplary architectural quality and innovative and sustainable building design, using robust, durable, attractive, and contextually appropriate materials throughout the building. Proposals should respond to the local character in the

architectural design of the building.

- (iii) Make a positive contribution to the quality of the local and wider townscape and skyline.
- (iv) Demonstrate that the development does not adversely impact on the microclimate, including wind, overshadowing, daylight and sunlight, solar glare, and light pollution, and amenity of the application site and the surrounding area.
- (v) Provide an adequate quantum of on site high-quality communal open space, child playspace areas and public realm (where residential uses are proposed), and where appropriate provide shared facilities at the ground floor level to encourage social cohesion and to promote health and well-being of occupants.
- (vi) Maintain adequate distance between buildings to ensure a high-quality ground floor experience and enhanced residential environment.
- (vii) Present a human scale of development at street level and comprise an attractive and legible streetscape that takes into account the use of the public realm for a variety of users and includes active uses at ground floor level.
- (viii) Where ground floor non-residential uses are proposed, the public realm should be enhanced through the incorporation of public spaces, such as plazas at their entrance, unless it can be clearly demonstrated that such an approach would not be appropriate.
- (ix) Sites which have existing through-routes, or are capable of accommodating through-routes, must ensure that such routes are maintained or provided to support ease of movement and connectivity.
- (x) Demonstrate consideration of public safety requirements as part of the overall design, including the provision of safe evacuation routes and two staircases.
- (xi) To not prejudice future development potential of adjacent/neighbouring buildings or plots.

Mid-rise Buildings

- (h) Buildings which do not fall within the definition of a tall building as set out in Part A, but are 12 to 21 metres from the ground level to the top of the building will be considered to be mid-rise buildings.
- (i) Proposals for mid-rise buildings will be supported in locations, as defined in the Local Plan Appendix and Policies Map, where the development would:
 - (i) Respond appropriately in height, scale and massing to existing buildings in the surrounding area, and protect or enhance heritage assets, including their settings;
 - (ii) Respect the scale, width and proportion of adjacent buildings, streets and local character, and avoid adverse effects on key characteristics, valued features and sensitivities with reference to the Council's draft Character Study (2024);
 - (iii) Respond to surrounding architectural styles, avoid the creation of long homogeneous blocks of development and create active frontages at ground floor level;
 - (iv) Be located and designed in order to create a step down between the proposed

development and buildings within the surrounding area;

- (v) Not impact negatively on daylight, sunlight, and overshadowing for neighbouring developments.

All development will also be expected to comply with the guidance set out in the Council's Urban Design Guide Supplementary Planning Document, Sutton Town Centre Public Realm Design Guide SPD or any successor document, including design codes.

39.D Regulation 18 Consultation Questions



- A. Do you agree that the definition of a tall building should be 21 metres or more? Should a different threshold be used?
- B. Do you agree with locations identified as Areas of Taller Building Potential?
- C. Do you agree with the criteria identified in the draft Policy?
- D. Do you agree that the Council should have a policy approach to 'mid-rise' buildings that fall below the definition of tall buildings?
- E. Are there any alternative approaches you could suggest?

Where possible, please give reasons for your answer above.

Issue 40 - Protecting Amenity

40.A Introduction

- 40.1** The 'amenity' or the features of a place that contribute to its attractiveness and comfort are major factors in the health and quality of life of Sutton's residents and workers. It is one of the reasons so many residents move from inner London to Sutton or choose to stay where they were born and brought up. In addition, privacy is important to enable residents to feel comfortable in their own homes.
- 40.2** The impact of development upon the amenity of neighbouring residents is one of the main issues to be assessed in the determination of planning applications. This can cover both the visual amenity and residential amenity impacts of the development. Visual amenity impacts often cover its design, scale and massing in terms of the character of the surrounding area and use of materials. The residential amenity impact relates to the developments effect upon a neighbour's outlook, privacy, sunlight/daylight and any noise and disruption likely to arise directly or indirectly as a result of the development.

40.B Context for Sutton

- 40.3** When development comes forward in Sutton, it is essential that amenity considerations are central to the design-led process. The proposed policy covers all development, including new build, extensions, alterations and changes of use. The aim is to protect the living conditions and amenity of occupants of new, existing, adjoining and neighbouring buildings as far as possible from the impacts of new development. The Council will support proposals for development that protect the amenity of both its future occupiers and the occupiers of adjoining properties. The term 'property' encompasses both the building as well as its curtilage.
- 40.4** In assessing whether sunlight and daylight conditions are good, both inside buildings and in gardens and open spaces, the Council will have regard to the most recent Building Research Establishment guidance, both for new development, and for properties affected by new development. In some circumstances, mathematical calculations to assess daylight and sunlight may be an inappropriate measure, and an on-site judgement will often be necessary. An overbearing, overpowering or over-dominant development can also significantly reduce the quality of living conditions both inside and outside, in new as well as existing developments. The impact on the sense of enclosure will often be dependent on on-site judgement.
- 40.5** Privacy is another key consideration, and new development should not cause adverse harm in terms of overlooking. Balconies or terraces on roofs of main buildings should not result in a significant intrusion into the privacy and quiet enjoyment of neighbouring residential properties. The degree of overlooking depends on the distance and the horizontal and vertical angles of view. Privacy of gardens and courtyards is also important. However, public spaces and communal

amenity areas will benefit from a degree of overlooking due to the increased level of surveillance it can provide.

Towards a Policy Approach

40.6 Based upon the evidence and analysis, the Council considers that it can move directly towards a draft policy approach for consideration as part of this Regulation 18 consultation. The draft policy is as follows:

40.C Draft Policy 40 on Protecting Amenity

- (a) The Council will grant planning permission for development unless it adversely affects the amenities of future occupiers or those currently occupying adjoining or nearby properties, or has an unacceptable impact on the residents of the surrounding area.
- (b) In assessing the impact of the proposed development, the Council will take into consideration the following:
 - (i) Overlooking causing loss of privacy and how this is addressed by design or separation
 - (ii) Sunlight, daylight, overshadowing and the need for artificial light for the host building or adjoining properties, including gardens or outdoor spaces.
 - (iii) Impact on outlook or visual amenity of neighbouring properties.
 - (iv) Any undue sense of enclosure onto the private amenity space of neighbouring properties.
 - (iv) Access is safe and secure and does not cause disturbances.
 - (v) Noise and vibration levels and times when such disturbances are likely to occur.
 - (vi) Odours, smoke, fumes, dust, litter accumulation, refuse collection/ storage and exterior lighting.
 - (vii) The effect of traffic movement to, from and within the site and car parking.
 - (viii) Microclimate (the climate of a very small or restricted area).
 - (ix) The ability to and the effect of being able to change use (as set out in the Town and Country Planning (General Permitted Development Order) (2015) without the need to obtain planning consent.
- (c) If the proposal can be made acceptable by mitigation measures, then the Council will seek these measures.

40.D Regulation 18 Consultation Questions



- A. Do you agree with the Council's draft policy on Protecting Amenity?
- B. Is there anything that could be added?

Where possible, please give reasons for your answer above.

Issue 41 - Heritage

41.A Introduction

- 41.1** One of the strategic objectives of the Local Plan is to ensure growth is respectful of Sutton's suburban character and historic environment and protects and enhances the borough's local distinctiveness.
- 41.2** The NPPF encourages plans to set out a positive strategy for the conservation and enjoyment of the historic environment. The London Plan (Policy HC1) encourages plans to demonstrate a clear understanding of the historic environment, and integrate heritage and regenerative change.

41.B Context for Sutton

Sutton's Historic Environment

- 41.3** While Sutton is often classified as a typical suburbia, the borough has a far richer history. It was a rural area until the 19th century characterised by large estates and the architectural reminders are still present in Carshalton and Cheam. The coming of the railway in the 1850s saw considerable development across the borough and as a result is home to some fine Victorian and Edwardian architecture. In addition, there is some notable industrial heritage along the River Wandle and some fine designs from the Arts and Crafts movement, which has influenced much of the inter-war suburban housing. More information on the development of the borough and its heritage can be found in the Draft Character Study (2024), Sutton's Conservation Area Character Appraisals and Management Plans and Areas of Special Local Character Appraisals online.

Heritage Assets in Sutton

- 41.4** Listed buildings are those buildings considered to be of special architectural or historic interest. They are designated by the Secretary of State (for Culture, Media and Sport), advised by Historic England. The Adopted Local Plan identifies 182 listed buildings. However, since 2018, Historic England has designated a number of new listed buildings and changed the grading of some existing listed buildings.
- 41.5** Scheduled Monuments are designated by the Secretary of State as sites of national importance, which may not always be visible above ground. The Local Plan lists six Scheduled Monuments including two archaeological sites.
- 41.6** Conservation Areas are areas of special architectural or historical interest identified by the Council under the Planning (Listed Buildings and Conservation Areas) Act 1990. There are 15 Conservation Areas in the borough. Since 2018, the Council undertook character appraisals of the following Conservation Areas: Beddington Park, Carew Manor, Carshalton Village, Cheam, Church Lane, Sutton Town Centre (formerly Sutton High Street Crossroad) and Wrythe Green. As a result of the appraisals, the Council approved revised boundaries for Beddington Park, Cheam, Church Lane and Sutton Town Centre.

- 41.7** Historic Parks and Gardens These may be designated by Historic England for their special historic interest of national significance, or locally designated by the Council for their historic and aesthetic interest. Sutton has one nationally designated and four locally designated historic parks and gardens.
- 41.8** Areas of Special Local Character are designated by the Council in order to preserve their locally distinctive character. The Adopted Local Plan identifies 22 ASLCs. Since 2018 the Council has designated two additional ASLCs. Three resident-led ASLC appraisals have also been published.
- 41.9** Locally Listed Buildings and Structures are designated by the Council because of their local historic or architectural interest. The Adopted Local Plan identifies 104 locally listed buildings. Since 2018, Historic England has added some of these locally listed buildings to the national list including a number of sewer ventilation columns. The Council is considering some potential additions to the local list (Appendix 8, Table 8.B2.2), subject to consultation with relevant owner-occupiers.
- 41.10** Archaeological Priority Areas (APAs) are areas where there is significant known archaeological interest or potential for new discoveries. In Sutton, they are identified by Historic England's Greater London Archaeological Advisory Service (GLAAS) and 21 APAs are designated in the Local Plan.

Heritage Policy

- 41.11** The Council aims to accommodate new growth whilst continuing its approach to conserve and enhance the historic environment. The Council has identified heritage assets which contribute to the historic environment in Local Plan Appendix 8 and 9. The Local Plan policy aims to protect and enhance these assets and their setting. The Council has regard to the significance of its heritage assets through the National Heritage List for England, Greater London Historic Environment Record, the borough's Character Study, Conservation Area Character Appraisals and Management Plans, character appraisals for Areas of Special Local Character and local lists.
- 41.12** The Council sees a role for development in aiding the conservation and enhancement of heritage assets, and for those assets in turn to provide a positive context for high quality in new development. For instance, the sensitive redevelopment of sites that currently detract from the historic high streets of both Carshalton and Cheam Village Conservation Areas and add to the centres' identity and distinctiveness. Similarly, development in other Conservation Areas, such as Wallington Green, could reveal and enhance individual heritage assets which are currently unremarkable due their poor setting.

Proposed updates - Heritage Assets

- 41.13** Some factual updates to the Local Plan Appendix are proposed (see Appendix 8, Schedules 8.A to 8.G and Maps 8.1a to 8.6a, 8.8a, 8.9a, 8.11a, 8.14a, 8.15a, 8.21a, 8.24a, 8.46a and 8.46b), to reflect changes in designation of heritage assets noted in paragraphs above. In addition, a number of minor corrections are also proposed to update descriptions of heritage assets, to amend some minor discrepancies such

as typographic errors, mapping errors and double counting. It is also proposed to include Historic England references for heritage assets where relevant. A minor amendment to the boundary of the Sutton Town Centre Conservation Area is proposed to exclude low quality frontage at Appendix 8, Map 8.21b.

41.14 The Council has proposed some potential additions to the local list (Appendix 8, Table 8.B2.2) using the agreed criteria. Further updates may also be identified in the preparation of neighbourhood plans, character studies, conservation area appraisals, and during the decision-making on planning applications.

41.15 In addition, Historic England are currently assessing whether to update the National Heritage List for England to reflect historic consents and redevelopment in Sutton. Greater London Archaeological Advisory Service are also proposing to review archaeological areas in Sutton. The Council will reflect any subsequent changes to listing of heritage assets in the draft Appendices.

Towards a Policy Approach

41.17 Based upon the evidence and analysis, the Council considers that it can move directly towards a draft policy approach for consideration as part of this Regulation 18 consultation. The draft policy is as follows:

41.C Draft Policy 41 on Heritage

General

- (a) The Council will conserve and, where practicable, enhance the borough's historic environment. This comprises: Listed Buildings and structures, Scheduled Monuments, Conservation Areas, Historic Parks and Gardens, Areas of Special Local Character, Locally Listed Buildings and undesignated archaeological remains.
- (b) Development that has an impact upon a heritage asset will be expected to conserve and, where practicable, enhance its significance. The Council will expect that new development integrates into the historic environment and will look for opportunities from new development affecting heritage assets and their settings to enhance or better reveal their significance.
- (c) Great weight will be given to conservation of Sutton's heritage assets. Any harm to the significance of a designated or non-designated heritage asset, or their loss, must be justified. Proposals will be weighed against:
 - (i) the public benefits of the proposal.
 - (ii) whether it has been demonstrated that all reasonable efforts have been made to sustain the existing use, find new uses or mitigate the extent of the harm to the significance of the asset.
 - (iii) whether the works proposed are the minimum required to secure the long-term beneficial use and retain the significance and conservation of the asset.
- (d) Proposals likely to affect the significance of a heritage asset, including the contribution made by its setting, should be accompanied by a description of its significance in sufficient detail to allow the potential impacts to be adequately assessed.

Listed Buildings and Structures

- (e) The Council will:
- (i) not permit the total or substantial demolition of a Listed Building or Structure unless exceptional circumstances are shown that outweigh the case for retention.
 - (ii) expect proposals for a change of use or alteration or extension to a Listed Building or Structure to have no adverse impact on those elements which contribute to the Listed Building or Structure's special architectural or historic interest and significance, including its setting.
 - (iii) not permit development which it considers would cause harm to the setting of a Listed Building or Structure unless the public benefits outweigh the harm.

For Listed Buildings see Appendix 8.A and Policies Map.

Scheduled Monuments

- (f) The Ancient Monuments and Archaeological Areas Act (1979) does not allow:
- (i) the disturbance of or addition to a Schedule Ancient Monument by carrying out works without consent.
 - (ii) the reckless or deliberate damage to a Scheduled Ancient Monument.
 - (iii) the removal of an object without a licence from Historic England.

For Scheduled Monuments see Appendix 8.G and Policies Map.

Conservation Areas

- (g) The Council will:
- (i) expect development within a Conservation Area to conserve and, where practicable, to enhance those elements which contribute to the Conservation Area's special character or appearance. These elements may include landscaped areas, gardens, trees, hedges and boundary treatments as well as the built form. In considering development proposals, consideration will be given to matters including height, scale, massing, materials, urban grain and layout, the public realm and views into and out of the Conservation Area.
 - (ii) not permit the total or substantial demolition of an unlisted building which makes a positive contribution to the character and appearance of a Conservation Area and, when in exceptional circumstances demolition is required, the replacement building will be expected to make the same or more of a positive contribution to the character and appearance of the Conservation Area.
 - (iii) expect development outside a Conservation Area but which would affect a Conservation Area to conserve and, where practicable, enhance those elements which contribute to the Conservation Area's special character or appearance.

For Conservation Areas see Appendix 8.E and Policies Map.

Historic Parks and Gardens (both nationally and locally designated)

- (h) The Council will:
- (i) expect that development conserves and, where practicable, enhances Historic Parks and Gardens and their settings
 - (ii) not permit development which harms the enjoyment, layout, design, character and appearance of Historic Parks and Gardens

For Historic Parks and Gardens see Appendix 8.D and Policies Map.

Areas of Special Local Character

- (i) The Council will:
 - (i) expect development within an Area of Special Local Character conserves and, where practicable, enhances those elements which contribute to the Area of Special Local Character's particular character or appearance. These elements may include landscaped areas, gardens, trees, hedges and boundary treatments as well as the built form.
 - (ii) expect development outside an Area of Special Local Character but which would affect an Area of Special Local Character to conserve and, where practicable, enhance those elements which contribute to the Area of Special Local Character's particular character or appearance.

For Areas of Special Local Character see Appendix 8 and Policies Map.

Locally Listed Buildings and Structures

- (j) The Council will encourage the retention, repair and reuse of Locally Listed Buildings and Structures.

For Locally Listed Buildings see Appendix 8 and Policies Map.

Archaeological Priority Areas

- (k) The Council will:
 - (i) in consultation with the Greater London Archaeological Advisory Service, require the necessary level of investigation and recording for development proposals that affect, or have the potential to affect Sutton's archaeological heritage. Remains of archaeological importance, whether scheduled or not, should be protected in situ, or if this is not possible, excavated and removed as directed by the Greater London Archaeological Advisory Service.
 - (ii) expect the applicant to have sought pre-application advice from the Greater London Archaeological Advisory Service before submitting an archaeological evaluation.
- (l) Where a scheme should be submitted for archaeological site-based survey and/or intervention, in addition to the method statement it will need to include analysis, publication, and archive deposition of the material and the records made, and for the public dissemination of the results to further understanding.

For Archaeological Priority Areas see Appendix 9 and Policies Map.

41.D Regulation 18 Consultation Questions



- A. Do you agree with the draft policy on Heritage?
- B. If you do not support the provisions of the draft policy, please give reasons and where possible suggest alternatives.
- C. Do you have any comments on Appendices 8 and 9 identifying the borough's heritage assets?
- D. Do you think the potential additions identified in Appendix 8, Table 8.B2.2 should be locally listed?

Issue 42 - Carbon and Energy

42.A Introduction

UK Net Zero Target

- 42.1** The Environment Act 2019 sets a national target for the UK to be ‘net zero’ carbon by 2050. This means that total greenhouse emissions must be reduced by 100% from 1990 levels by this date and that total UK emissions must be equal to or less than the emissions removed from the environment. A system of carbon budgets has been set up to ensure that the UK does not emit more than its allowance in the next 27 years. This legal requirement is underpinned by the Climate Change Committee’s report ‘Net Zero: The UK’s Contribution to Stopping Global Warming’.
- 42.2** Section 19(1A) of the Planning and Compulsory Purchase Act 2004 requires that Local Plans include ‘*policies designed to secure that the development and use of land in the local planning authority’s area contribute to the mitigation of, and adaptation to, climate change*’. Accordingly, the NPPF (2023) expects the planning system to contribute to a ‘*radical reduction in greenhouse gas emissions*’ (Para 148) and requires local planning authorities to take a proactive approach (Para 149). Furthermore, the Government has confirmed that the Planning and Energy Act 2008 will not be amended. This means that local planning authorities can set energy efficiency standards for new buildings without conflicting with national policy.

Changes to the Building Regulations

- 42.3** The updated Building Regulations (Part L 2021), introduced from June 2022, provides a new baseline for regulated CO₂ emissions¹⁷ against which planning policy targets can be set. It is estimated that a Part L 2021 compliant dwelling will reduce emissions by approximately 31% on average compared with a Part L 2013 compliant dwelling. In addition the standard assessment procedure (SAP) methodology used to calculate compliance for Part L has also been updated (SAP version 10.2).
- 42.4** In order for a proposed dwelling to comply with Part L 2021: the dwelling primary energy rate (DPER) in kWh/m² per year must be less than the target primary energy rate (TPER); the dwelling emission rate (DER) in kWh/m² per year must be less than the target emission rate (TER); and the dwelling fabric energy efficiency rate (DFEE) kWh/m² per year must be less than the target primary energy rate.
- 42.5** For proposed dwellings, the key changes introduced via Part L 2021 are as follows:
- a new requirement for primary energy use is set relating to how much delivered energy is required by the new home and reported in kWh/m²/year;
 - due to the progressive decarbonisation of the grid¹⁸, carbon factors have been updated. As a result, electric forms of heating (e.g. heat pumps, direct electric) are now much lower carbon than fossil fuel heating (e.g. gas boilers); and i.e.

¹⁷ ‘regulated emissions’ consist of carbon dioxide (CO₂) emissions from heating, lighting, ventilation and power

¹⁸ the carbon factors for grid electricity underpinning Part L 2021 has now dropped to 0.136 kgCO₂/kWh. This is 74% lower than the carbon factor underpinning Part L 2013 (i.e. 0.519 kgCO₂/kWh), and lower than that of gas (i.e. 0.210 kgCO₂/kWh)

- the assumptions used for the ‘notional’ dwelling to derive the target emission rate (TER) have been revised. The most significant change is that solar PV and waste water heat recovery are assumed in the notional building.

42.6 It is anticipated that the next revision of Part L will come into force in 2025 together with an update to SAP. This will be referred to as the Future Homes Standard for new domestic buildings and the Future Buildings Standard for new non-domestic buildings. While the details are not known at this stage, it is expected that new dwellings incorporating fossil fuel heating (such as gas boilers) will find it very challenging to comply. In addition, it is expected that Part L 2025 will require buildings to be ‘zero carbon ready’, with no retrofit work required to benefit from the decarbonisation of the grid and the electrification of heating.

UK net zero carbon pathway

42.7 The Climate Change Committee (CCC) report ‘UK Housing: Fit for the Future?’ (2019) concluded that newly constructed buildings are currently not energy efficient enough; they mostly use fossil fuels for heating and hot water; and they generate very small amounts of renewable energy. In summary, they are adding to the problem of climate change and are not consistent with meeting national, Mayoral or local net zero targets. The report identified the following measures as key to achieving net zero carbon:

- 100% low carbon electricity by 2050;
- ultra-efficient new homes and non-domestic buildings;
- low carbon heat to all but the most difficult to treat buildings; and
- ambitious programme of retrofit of existing buildings;

42.8 The CCC Report noted that if new buildings continue to be designed and built to meet current standards, they will need to be retrofitted within the next 10-30 years in order to reduce their carbon emissions. For example, any new gas boiler would have to be replaced with a low carbon heating system. This would be much more expensive than designing and constructing them to the right standard now, and this extra cost would fall mostly on residents, local authorities and housing associations. The report recommended that new homes should deliver ultra-high levels of energy efficiency as soon as possible (by 2025 at the latest), consistent with a maximum space heat demand of 15-20 kWh/m²/year and notes that designing in these features from the start is around one-fifth of the cost of retrofitting to the same quality and standard.

42.9 Carbon offsetting should therefore have an increasingly limited role if the UK is to achieve net zero by 2050, and it should not be relied on as the primary mechanism to decarbonise new buildings.

Embodied and ‘Whole Life’ Carbon

42.10 In order to deliver net zero carbon buildings, greater emphasis must be placed on reducing ‘whole life’ carbon. This brings together ‘upfront’ embodied carbon¹⁹ (i.e. the initial amount of embodied carbon associated with the building), operational

¹⁹ ‘upfront’ embodied carbon refers to the greenhouse gas emissions associated with the manufacture, transport, construction, repair, maintenance, replacement and deconstruction of all building elements

carbon and estimated carbon emissions associated with replacement, maintenance and demolition. While there are currently no approved universal standards defined for embodied carbon, Low Energy Transformation Initiative (LETI) and Royal Institute of British Architects (RIBA) targets have been aligned since May 2021, with best-practice (design phase) performance considered to be a 'C' rating.

Fuel Poverty

42.11 In the context of the cost of living crisis and the current spike in fuel prices, fuel poverty is an increasingly important issue. Energy efficient dwellings help to reduce energy consumption and costs in a sustainable way. Solar photovoltaic (PV) systems can also generate significant cost savings for residents, with the potential to generate revenue through the export of electricity to the grid.

Defining net zero carbon and best practice performance targets

42.12 A significant amount of work has been undertaken since 2019 to define a net zero carbon building, including studies undertaken by the Climate Change Committee (CCC); the Royal Institute of British Architects (RIBA), the Chartered Institute of Building Services (CIBSE); UK Green Building Council (UKGBC); the Better Buildings Partnership (BBP); the Passivhaus Trust; the Good Homes Alliance (GHA); and the Low Energy Transformation Initiative (LETI). Relevant reports and initiatives include:

- UKGBC Net Zero Carbon - A framework definition;
- LETI Net Zero operational carbon one pager;
- LETI Climate Emergency Design Guide;
- Whole Life Carbon Network (WLCN) - Carbon definitions for the built environment; and
- RIBA 2030 Climate Challenge.

42.13 All of the above studies and definitions of net zero carbon are consistent in their approach, and all have similar ways of measuring performance (or 'metrics') that focus upon setting targets for Energy Use Intensity (EUI) (kWh/m²/year) and for embodied carbon²⁰ (kg CO₂/m²).

42.14 In summary, a net zero carbon building is one which achieves a low level of space heating demand and total energy use, cannot use fossil fuels on site and needs to generate sufficient renewable energy on-site to match its energy use on an annual basis. Key features of a net zero carbon building are:

- **Energy efficiency:** A net zero carbon building is energy efficient and must comply with a maximum Energy Use Intensity (EUI)²¹ value, depending on the building type. All energy use within the building must be considered, included both regulated emissions²² controlled by the Building Regulations and unregulated emissions for appliances, and cooking etc;

²⁰ embodied carbon is either based upon 'upfront embodied carbon' or 'lifecycle embodied carbon' or both

²¹ EUI can be thought of as a general measure of 'delivered energy' to the building

²² regulated emissions controlled by Part L of the Building Regulations include those from heating, cooling, ventilation and power

- Low carbon heat: A net zero carbon building should be served by a low carbon heating system, must not connect to the gas network or, more generally, use fossil fuels on-site; and
- Renewable energy: A net zero carbon building should add at least as much renewable energy generation to the energy system as the energy they will use on an annual basis. In London, solar PV panels will be the main renewable energy system to achieve this.

UK Wide Net Zero Carbon Building Standard (NZCBS)

42.15 The purpose of the NZCBS will be to provide a rule book which can be used to demonstrate that a building has achieved net zero carbon and to provide clarity on how to assess new and existing buildings. While this will not initially be a certification scheme it is intended that this is developed from the NZCBS at a later date. The key measurable criteria or ‘metrics’ underlying this standard are likely to be Energy Use Intensity (EUI) (kWh/m²/yr); upfront (A1-A5) embodied carbon (kg CO₂/m²); life cycle (A1-C4) embodied carbon (kg CO₂/m²).

Accelerated Green Pathway for London

42.16 The GLA has commissioned consultants to analyse pathways for London to reach Net Zero by 2030. Their report ‘Analysis of a Net Zero 2030 Target for Greater London’ (Element Energy, 2022) explores four possible pathways that London could take. Based on this analysis, the Mayor of London adopted the Accelerated Green Pathway as the preferred pathway for London. It now replaces the previous trajectory in the 1.5°C Plan. This pathway aims to reduce baseline emissions (30MtCO₂/year in 2020) by more than 65% by 2030 down to 10MtCO₂/year. Key features of this pathway for buildings include:

- 40% reduction in heat demand of buildings;
- 200,000 homes retrofit each year, to achieve average EPC B or 65kWh/m²/yr;
- gas boilers in new developments banned by 2025;
- gas boiler replacements banned by 2026 (with exceptions in areas expected to remain connected to the grid using biomethane);
- 2.2 million heat pumps by 2030, including 284,000 in 2028 alone, 60% of homes supplied with low carbon heat by 2030; and
- 1.5GW of PV generation by 2030 and 3.9GW by 2050.

London Plan

42.17 London Plan Policy SI 2 on ‘Minimising greenhouse gas emissions’ requires that major developments should achieve net zero-carbon standards in accordance with the following energy hierarchy

- (1) be lean: use less energy and manage demand during operation;
- (2) be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly;
- (3) be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on site; and
- (4) be seen: monitor, verify and report on energy performance.

- 42.18** Targets are set for major developments to deliver an on-site reduction in CO₂ emissions of at least 35% beyond Building Regulations. Residential development should achieve a 10% reduction, and non-residential development should achieve 15% through energy efficiency measures alone. Where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site, any shortfall should be provided through a carbon offset contribution.
- 42.19** Larger development proposals referable to the Mayor must calculate whole life-cycle carbon emissions through a ‘nationally recognised’ Whole Life-Cycle Carbon Assessment.
- 42.20** London Plan Policy SI 3 on ‘Energy Infrastructure’ requires that development plans should *‘identify existing heating and cooling networks, identify proposed locations for future heating and cooling networks and identify opportunities for expanding and inter-connecting existing networks as well as establishing new networks’*. Major development proposals within Heat Network Priority Areas should incorporate a communal low-temperature heating system, with the heat source selected according to the following heating hierarchy:
- (a) connect to local existing or planned heat networks;
 - (b) use zero-emission or local secondary heat sources (in conjunction with a heat pump, if required;)
 - (c) use low-emission combined heat and power (CHP) (only where there is a case for CHP to enable the delivery of an area-wide heat network, meet the development’s electricity demand and provide demand response to the local electricity network); and
 - (d) use ultra-low NOx gas boilers.
- 42.21** Where a heat network is planned but not yet in existence the development should be designed to allow for cost-effective connection at a later date.

42.B Context for Sutton

Delivering Net Zero study

- 42.22** The identification of key planning policy issues and preferred options on net zero has been informed by a range of studies, guidelines and emerging best practice. These include the ‘Delivering Net Zero’ study prepared on behalf of Sutton and 18 partner boroughs (Etude, May 2023); London Council’s Low Carbon Development Toolkit (November 2023); Mayoral guidance on energy assessments (GLA, 2022), decentralised energy, whole life carbon and the circular economy; and available guidance on low and zero carbon development published by the London Energy Transformation Initiative (LETI), the UK Green Building Council and the Town and Country Planning Association (TCPA) amongst others.
- 42.23** The Delivering Net Zero (DNZ) Study 2023 incorporated detailed energy and cost modelling for each of the building types (four domestic, four non-domestic); terraced; low-rise apartment, medium-rise apartments and high-rise apartments (domestic) office; school; light industrial/warehouse; and hotel (non-domestic). 24 different combinations of specifications were investigated in terms of:

- fabric and ventilation ('business as usual'; 'good practice' and 'ultra-low energy');
- heating system (gas boiler; direct electric; less efficient heat pump; more efficient heat pump); and
- solar PV (no solar PV; high provision of solar PV).

Towards a Policy Approach for Sutton

42.24 Based on the findings and recommendations of the DNZ Study, two alternative policy options have been identified for the purpose of going beyond the minimum requirements of the Building Regulations to deliver net zero carbon buildings in line with the Mayor's accelerated pathway to net zero and the Council's Climate Emergency Plan commitments.

Option 1 - Absolute energy performance targets

42.25 The recommended policy option identified in the DNZ Study (Preferred Policy Option 1 below) seeks to deliver net zero carbon standards for proposed developments by setting a number of absolute energy performance metrics for different building types plus a number of additional requirements. These include:

1. No fossil fuels allowed on site;
2. Absolute targets set for space heating demand e.g. <15-20 kWh/m² per year;
3. Absolute targets set for energy use intensity (EUI) e.g. <35 kWh/m² per year for domestic buildings;
4. Minimum target set for renewable energy generation (e.g. to match the EUI or >100 kWh/m² footprint per year);
5. Requirement to minimise 'upfront' embodied carbon;
6. Energy offsetting is used rather than carbon offsetting;
7. Takes account of unregulated emissions (e.g. from appliances and cooking) and not only operational emissions controlled by Part L of the Building Regulations i.e. heating, ventilation, light and power.

Option 2 - Reducing CO₂ Emissions Compared to Part L 2021

42.26 The alternative policy option identified in the DNZ Study (Policy Option 2 below) takes forward the existing approach followed in London Plan Policy SI 2, the Mayor's Energy Assessment Guidance 2022 and Sutton's current Local Plan 2018 by requiring proposed developments to minimise regulated CO₂ emissions in accordance with the Mayor's energy hierarchy (see above) to achieve a percentage reduction in compared to a 'notional' Part L 2021 compliant building. The baseline (notional building) emission rate is used to set the Target Emission Rate (TER), and the proposed building emission rate is known as the Dwelling or Building Emission Rate (DER or BER). For major developments, remaining off-site emissions are offset via a financial contribution to a locally established carbon offset fund at a price of £95 per tonne over a period of 30 years.

Why is Option 1 preferred?

42.27 Setting an emissions target based upon a percentage reduction in CO₂ emissions over a notional Part L 2021 compliant building, as would be required under Policy Option 2 and in line with the existing Local Plan (2018) approach, is an intangible

requirement that cannot be measured, whereas an absolute energy use target in kWh/m² per year as required under Preferred Option 1 can be checked directly against metered energy in the occupied building. This makes post-construction verification much easier and more reliable.

- 42.28** While Policy Option 2 relies on carbon emission factors and primary energy factors which introduce additional complexity, compliance with energy use metrics as required by the Preferred Policy Option 1) is only affected by changes in building design, and not by these wider ‘system factors’.
- 42.29** As the national electricity grid decarbonises, focusing only on CO₂ emissions can obscure the differences in performance between buildings. Using energy metrics (EUI, space heating demand and renewable energy generation) will help to incentivise good building design.
- 42.30** Furthermore, Policy Option 2 does not account for CO₂ emissions from equipment and appliances. This represents approximately 50% of energy use in a low energy home.
- 42.31** The SAP (Standard Assessment Procedure) and the National Calculation Methodology (NCM) are the calculation methodologies used to demonstrate compliance with Part L of the Building Regulations for domestic and non-domestic buildings respectively. However these energy assessment methodologies were developed only to check compliance with Part L of the Building Regulations and were not developed for the purpose of assessing the delivery of net zero carbon buildings or for predicting future energy use accurately.
- 42.32** For domestic buildings, the Passive House Planning Package (PHPP) makes use of numerous tested and approved calculations to yield a building's heating, cooling and primary energy demand and has been shown to predict energy use much more accurately than SAP. For non-domestic buildings, predictive energy modelling using the methodology set out in CIBSE Technical Memorandum 54 (TM54) allows estimation of the operational energy for all end uses of a building.

Towards a Policy Approach

- 42.33** Based upon the above evidence and analysis, the Council has established a series of policy principles and options for consideration as part of the Regulation 18 consultation on the Sutton Local Plan. These are:

42.C Draft Policy Principles and Options 42 on Carbon and Energy	
Preferred Policy Option 1: Absolute energy performance targets	
Criterion	Policy Principle - Preferred Option 1
Net Zero Carbon	All residential developments involving the creation of at least one self-contained dwelling and all non-residential developments > 1,000 m ² GFA must be supported by an Energy Assessment and demonstrate net zero carbon standards in operation in line with the emerging UK industry definition.

Use of gas boilers	No gas boilers or any other fossil fuels are permitted on-site ²³ .
Heating demand	Space heating demand for all buildings is limited to <15kWh/m ² per year ²⁴ .
Energy use intensity (EUI)	Energy use intensity (EUI) standards are set for the following different types of residential and non-residential buildings; <ul style="list-style-type: none"> terraced house: EUI < 35 kWh/m² per year; low-rise apartment building: EUI < 35 kWh/m² per year; mid-rise apartment building: EUI < 35 kWh/m² per year; high-rise apartment building: EUI < 35 kWh/m² per year; office building: EUI < 70 kWh/m² per year; primary school building: EUI < 65 kWh/m² per year; industrial building: EUI < 35 kWh/m² per year; hotel EUI: < 160 kWh/m² per year;
Renewable energy generation	Where feasible, on-site renewable energy generation must match EUI or be greater than >35 kWh/m ² per year to achieve a balance with energy use.
Embodied carbon	Upfront embodied carbon associated with demolition and building materials used for construction must be considered.
Thermal bridging	Assured energy performance is required (e.g. 'accredited construction details' for minimising thermal bridging).
Energy offsetting	Energy offsetting is used as a last resort in order to achieve net zero carbon, rather than carbon offsetting.

Policy Option 2 Reducing CO₂ emissions compared to Part L 2021

Criteria	Policy Principle - Option 2
Percentage reduction compared to Part L 2021	Takes forward the approach followed by Policy SI 2 of the London Plan, the Mayor's updated Energy Assessment Guidance 2022, the current Sutton Local Plan 2018 and by most London boroughs by requiring a percentage on-site reduction in regulated CO ₂ emissions for the proposed building compared to a 'notional' Part L 2021 compliant building.
Calculation of baseline emissions and use of SAP/SBEM	Requires baseline emissions or the Target Emission Rate (TER) for the Part L compliant notional building and the Dwelling or Building Emission Rate (DER or BER) to be calculated using the latest Standard Assessment Procedure (SAP) or Simplified Building Energy Model (SBEM) software for residential and non-residential buildings respectively.
On-site emissions reduction targets against Part L 2021	Sets on-site emissions reduction targets for the following different types of residential and non-residential buildings based on the recommendations of the Delivering Net Zero Study 2023; <ul style="list-style-type: none"> terraced house EUI - 65% reduction on Part L 2021; low-rise apartment building - 65% reduction on Part L 2021; mid-rise apartment building - 65% reduction on Part L 2021; high-rise apartment building - 65% reduction on Part L 2021; office building - 25% reduction on Part L 2021; primary school building - 35% reduction on Part L 2021;;

²³ this is consistent with the GLA's Accelerated Green Pathway which relies on banning new gas boilers

²⁴ this is consistent with the Committee on Climate Change's recommendations set out in 'The Future of Housing' (CCC, 2019)

	<ul style="list-style-type: none"> • industrial building - 45% reduction on Part L 2021; • hotel - 10% reduction on Part L 2021.
Fabric energy efficiency (step 1: be lean)	Requires a 10% reduction through fabric energy efficiency measures alone (step 1: be lean) for major residential and a 15% reduction for non-residential developments in line with the Mayor's Energy Assessment Guidance 2022;
Carbon offsetting	Requires the emissions reduction shortfall to be offset via a payment into the Council's carbon offset fund (as secured by a legal agreement) priced at £95 per tonne over 30 years to fund equivalent carbon reduction measures elsewhere.
Exclusion of unregulated emissions	Excludes 'unregulated' emissions from embodied and whole-life carbon and relies significantly on carbon offsetting to achieve zero carbon.

Policy principles common to Preferred Policy Option 1 and Policy Option 2

- All residential and non-residential developments must minimise on-site CO₂ emissions through application of the Mayor's energy hierarchy (be lean; be clean; be green; be seen).
- All major residential and non-residential developments located within a Heat Network Priority Area identified by the Mayor and/or a Decentralised Energy Opportunity Area identified by the Council must be served by a communal or site-wide low carbon and low-temperature heating system;
- All proposed site-wide or communal heating systems located within a Heat Network Priority Area and/or a Decentralised Energy Opportunity Area must be designed to connect to local existing or planned heat networks and be served by zero-emission or local secondary heat sources in line with the Council's decentralised energy (DE) protocol (see Appendix 10 Schedule 10.A(i));
- All householder developments such as residential extensions, loft conversions and outbuildings are exempt from the net zero carbon requirement;
- Simplified energy assessment reporting requirements are set for single dwellings and minor non-residential developments under 1,000 m² GIA;
- The zero carbon requirement applies to changes of use, conversions and major refurbishments as well as to new builds;
- A whole life carbon (WLC) assessment must be undertaken for major developments in accordance with Mayoral Guidance on WLC Assessments 2020;
- All major commercial developments must achieve an 'Excellent' rating under the Building Research Establishment Environmental Assessment Method (BREEAM).

For the location of Heat Network Priority Areas and Decentralised Energy Opportunity Area boundaries see the Local Plan Appendix and Policies Map.

42.D Regulation 18 Consultation Questions



- A. Do you agree with the draft Policy on Carbon and Energy?
- B. Which option do you prefer and why - Option 1 or Option 2?
- C. If you do not support any aspect of Policy Options 1 or 2, please give reasons and where possible suggest alternatives.

Issue 43 - Overheating and Cooling

43.A Introduction

The need to manage overheating in new and refurbished buildings

43.1 The UK's Third National Adaptation Programme recognises that higher summertime temperatures and heatwaves arising from climate change will lead to increased numbers of people becoming unwell or dying prematurely in the UK. In 2020 for example an additional 2,500 deaths were recorded during the summer heatwave in England which could not be explained by other factors.

43.2 In the absence of effective and coordinated policy measures to mitigate and reduce public exposure to overheating and its associated impacts, including upon local air quality, it is predicted that heat-related deaths could triple by the 2050s, taking account of current climate and population trends. It is well established that the risks to health and well-being amongst certain vulnerable groups, such as the elderly, young children, people affected by long-term health conditions and those living in poor quality housing (often in areas of higher social deprivation) are disproportionately affected by excessive and prolonged exposure to higher temperatures.

43.3 A wide range of measures are available to planners and developers for minimising the risks to public health and well-being arising from overheating and the urban heat island effect. These include green roofs, nature-based SuDS measures, biodiversity net gain (BNG), tree planting and protecting ecological pathways. The central role of urban greening measures both as an integral part of the design and layout of new developments and as part of wider greenspace networks is covered elsewhere in this document under Issue 35 on Green Infrastructure.

43.4 The need to reduce overheating risks in new or refurbished buildings is identified as a key priority in the Third National Adaptation Programme.

Policy context

43.5 There are many ways in which the design and layout of a development can lead both to an increase in heat risk for occupants during a summer heatwave and exacerbate the urban heat island effect within built-up areas. For example, buildings which are more difficult to ventilate naturally; which incorporate a high proportion of glazing or which are increasingly airtight are often more likely to overheat.

43.6 London Plan Policy SI 4 requires that major development proposals should demonstrate in their energy strategy how they will reduce the potential for internal overheating and reliance on air conditioning systems in accordance with the following cooling hierarchy:

- (1) Reduce the amount of heat entering a building through orientation, shading, high albedo materials, fenestration, insulation and the provision of green infrastructure;
- (2) Minimise internal heat generation through energy efficient design;

- (3) Manage the heat within the building through exposed internal thermal mass and high ceilings;
- (4) Provide passive ventilation;
- (5) Provide mechanical ventilation; and
- (6) Provide active cooling systems.

43.7 Overheating risk can be mitigated in many ways which avoid the need for active cooling systems. Available measures include solar shading, building orientation, solar-controlled glazing and passive ventilation such as openable windows, shallow floorplates, dual aspect units or designing in the 'stack effect' where possible. Air conditioning and other active cooling systems are discouraged due to their energy requirements and contribution to the urban heat island effect.

43.8 The Chartered Institution of Building Services Engineers (CIBSE) has produced detailed technical guidance on assessing overheating risk in new developments through dynamic thermal modelling. CIBSE TM59 guidance applies to domestic developments and CIBSE TM52 applies to non-domestic developments. Accordingly, the Mayor's Energy Assessment Guidance (GLA, May 2022) requires that the design, layout and ventilation strategy for all proposed developments meets the minimum overheating criteria in CIBSE Guidance and demonstrates compliance with the Mayor's cooling hierarchy (see above).

43.9 When undertaking dynamic thermal modelling, applicants should refer to the checklist set out in Part 2b to Approved Document O of the Building Regulations as amended. CIBSE TM 49 guidance and the associated datasets should also be used to ensure that all new developments are designed for the climate it will experience over its design life. In addition, proposed developments are encouraged to complete the Good Homes Alliance (GHA) Early Stage Overheating Risk Tool at the pre-application stage and include it as part of the submitted energy strategy.

43.10 All energy statements prepared in support of planning applications must set out the results of overheating risk analysis and dynamic thermal modelling in order to demonstrate how the proposed development performs against the relevant overheating criteria in TM59, TM52 and TM49 together with details of any assumptions made. It is expected that the relevant CIBSE compliance criteria are met for the DSY1 weather scenario. This information should also include details of proposed mitigation measures to reduce the risk of overheating during extreme weather years, through the use of the CIBSE DSY2 and DSY3 weather files, and a strategy for occupants to deal with extreme overheating events.

43.11 Developers must ensure that the results of the overheating analysis continue to inform the design and layout of the development through the detailed design stage.

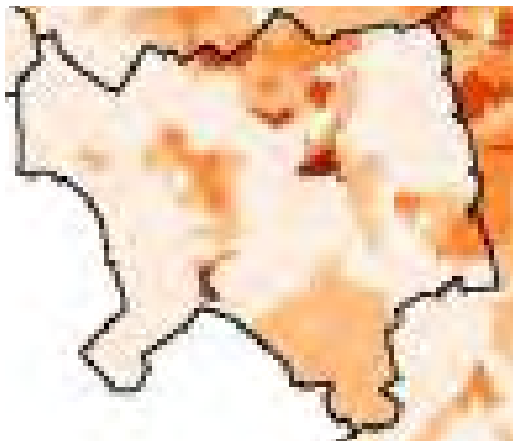
43.B Context for Sutton

43.12 Building on London-wide climate risk mapping work previously undertaken on behalf of the GLA by Bloomberg Associates in order to identify areas that are most exposed to climate impacts, such as heat risk and flooding, and overlay these with

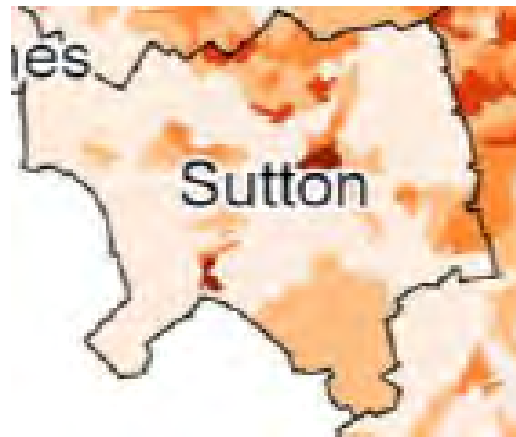
areas with high concentrations of vulnerable populations²⁵, the GLA's 'Properties Vulnerable to Heat Impact Report' (Arup, January 2024) maps London's heat risk across homes, neighbourhoods and essential properties. The study looked at residential properties, schools, hospitals, care homes and wider neighbourhoods in order to identify where occupants are especially vulnerable to heat-related hazards. This detailed spatial analysis confirms the direct link between higher heat risks and areas affected by higher levels of social and economic deprivation.

43.13 The following borough heat risk maps are extracted from the study.

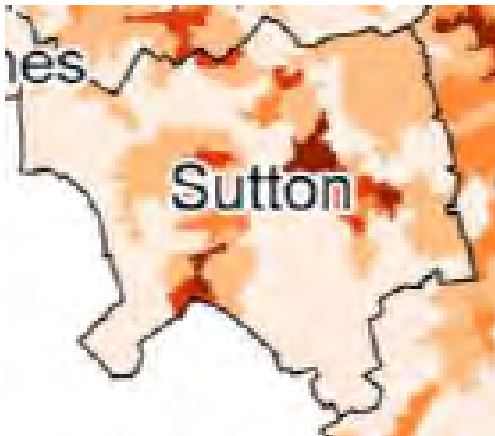
Map 43.1: Property heat risk map at neighbourhood (LSOA) level



Map 43.2: Property heat risk map at neighbourhood (LSOA) level: Schools



Map 43.3: Property heat risk map at LSOA level: Residential properties



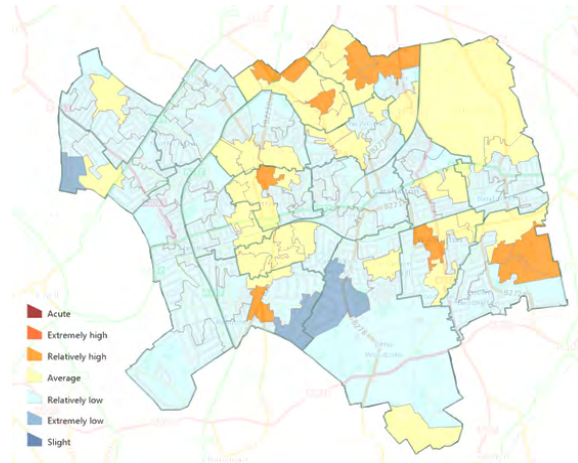
Source: Properties Vulnerable to Heat Impacts in London (GLA/ARUP, Jan 2024)

43.14 The following map, sourced from the Climate Just website²⁶, indicates the location of vulnerable neighbourhoods (to heat risk) within the borough.

²⁵A London Climate Risk A Spatial Analysis of Climate Risk Across Greater London (GLA, Bloomberg, 2022 is available at <https://data.london.gov.uk/dataset/climate-risk-mapping>

²⁶the Climate Just website is available at: <https://www.climatejust.org.uk/>

Map 43.4 Urban Heat Island (UHI): location of vulnerable neighbourhoods



Source: Climate Just Website 2020

Towards a Policy Approach

43.15 Based upon the evidence and analysis, the Council considers that it can move directly towards a draft policy approach for consideration as part of this Regulation 18 consultation. The draft policy is as follows:

43.C Draft Policy 43 on Overheating and Cooling

- (a) All development proposals must seek to minimise the adverse impacts of summer heatwaves and mitigate the urban heat island effect through the incorporation of urban greening measures as an integral part of the design and layout and maximise their multi-functional benefits in line with Local Plan Issue 5 on Urban Greening and Climate Change Adaptation.
- (b) All proposed residential developments, including residential conversions and changes of use, creating at least one additional self-contained dwelling and all major commercial developments must demonstrate how heat risk will be managed in line with the Mayor's cooling hierarchy in London Plan Policy SI 4 or equivalent:
 - (i) Reduce the amount of heat entering a building through orientation, shading, high albedo materials, fenestration, insulation and the provision of green infrastructure.
 - (ii) Minimise internal heat generation through energy efficient design.
 - (iii) Manage the heat within the building through exposed internal thermal mass and high ceilings.
 - (iv) Provide passive ventilation.
 - (v) Provide mechanical ventilation.
 - (vi) Provide active cooling systems
- (c) All developments referable to the GLA must complete the Good Homes Alliance Early Stage Overheating Risk Tool at the pre-application stage and submit it to the GLA as part of the preliminary energy information for the development in accordance with Appendix 1 of the GLA Energy Assessment Guidance 2022 as amended.
- (d) All planning applications for residential developments and for major commercial developments must be supported by an overheating/cooling strategy either as part of the energy statement or as a free-standing document. The submitted overheating/

cooling strategy must include the following in line with GLA Energy Assessment Guidance 2022 as amended:

- (i) Incorporate the results of dynamic overheating modelling in line with the guidance and datasets in CIBSE TM59 and TM49 for residential and commercial developments respectively, taking into account the associated Approved Document O requirements where relevant;
- (ii) Provide evidence of how the development performs against the overheating criteria along with an outline of any assumptions made in the energy assessment.
- (iii) Demonstrate that the relevant CIBSE compliance criteria are met for the DSY1 weather scenario for each unit.
- (iv) Include details of proposed mitigation measures to reduce the risk of overheating during extreme weather years through the use of the CIBSE DSY2 and DSY3 weather files and a strategy for occupants to deal with extreme overheating.
- (v) In the event that any of the relevant CIBSE guidance and datasets or Approved Document O requirements are updated or superseded over the plan period, meet the requirements of updated GLA Energy Assessment guidance as appropriate.

43.D Regulation 18 Consultation Questions



- A. Do you agree with the draft policy on Overheating and Cooling?
- B. If you do not support any aspect of the draft policy please give reasons and where possible suggest alternatives.

Issue 44 - Flood Risk Management and Flood Resilience

44.A Introduction

44.1 The NPPF (2023) requires Local Plans to apply a sequential, risk-based approach to the location of development - taking into account all sources of flood risk and the current and future impacts of climate change - so as to avoid, where possible, flood risk to people and property by:

- applying the 'sequential test' and then, if necessary, the 'exception test' (see below);
- safeguarding land from development that is required for current or future flood management; and
- using opportunities provided by new development and improvements in green infrastructure to reduce the causes and impacts of flooding, maximising the use of nature-based solutions.

44.2 The purpose of the sequential test is to steer new development towards areas with the lowest risk of flooding from any source. Development must not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. The strategic flood risk assessment (SFRA) will provide the basis for applying this test. If it is not possible for development to be located in areas with a lower risk of flooding (taking into account wider sustainable development objectives), the exception test may have to be applied.

44.3 The need for the exception test to be demonstrated for a particular type of development within a flood risk area will depend on the potential vulnerability of the proposed use according to the Government's flood risk vulnerability classification table. The application of the exception test should be informed either by a SFRA prepared by the local planning authority or site specific flood risk assessment (FRA) submitted by the developer, depending on whether it is a potential site allocation or a planning application.

44.4 To pass the exception test, it must be demonstrated that:

- the development would provide wider sustainability benefits to the community that outweigh the flood risk;
- the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall; and
- both elements of the exception test should be satisfied for development to be allocated or permitted.

44.5 Development should only be permitted in flood risk areas where it can be demonstrated that (a) within the site, the most vulnerable uses are located in areas of lowest flood risk, and (b) the development is appropriately flood resistant and resilient; it incorporates sustainable drainage systems (SuDS), unless there is clear evidence that this would be inappropriate; any residual risk can be safely managed;

and safe access and escape routes are included as part of an agreed emergency plan.

- 44.6** The NPPF requires that a site-specific FRA must be prepared for all developments located within Flood Zones 2 (medium risk) or 3 (high risk). An FRA is also required for proposed developments within Flood Zone 1 (low risk) where the site area is greater than 1 ha; the land is identified by the EA as having critical drainage problems; the land is identified in a SFRA as being at increased flood risk in future; the land is subject to other sources of flooding, or where the proposed development would introduce a more vulnerable use.
- 44.7** The following changes have recently been introduced to the NPPF which have strengthened Government planning policy on flood risk management, including:
- the requirement for Local Plans to consider all sources of flood risk;
 - further encouragement for the use of green infrastructure and nature-based solutions within developments to reduce the causes and impacts of flooding;
 - the inclusion of an allowance for climate change and the requirement to take account of surface water flood risk as part of the 'design flood';
 - defining the 'functional floodplain' (i.e. Flood Zone 3b) as land with a fluvial flood risk greater than 3.3% AEP and not 5% as previously ;
 - setting the lifetime of non-residential development at 75 years;
 - clearer guidance on the application to the sequential and exceptions tests.
- 44.8** Further guidance on all aspects of how flood risk should be taken into account for proposed developments located within flood risk areas is set out in the Government's planning practice guidance (PPG) and in EA Standing Advice on preparing a flood risk assessment . The Standing Advice relates to the following categories: minor extensions (under 250 m²) located in Flood Zones 2 or 3; 'more vulnerable' developments such as dwellings located in Flood Zone 2; 'less vulnerable' developments located in Flood Zone 2 and 'water compatible' developments in Flood Zone 2.
- 44.9** Where flood avoidance is not possible for a development proposal in a flood risk area, flood resistance and/or resilience measures must be incorporated as part of the design and layout in line with the Property Flood Resilience Code of Practice developed by CIRIA or equivalent.
- 44.10** London Plan (2021) Policy SI 12 on 'Flood risk management' requires development proposals to ensure that flood risk is minimised and mitigated, and that residual risks are addressed. This should include, where possible, making space for water and aiming for development to be set back from the banks of watercourses. Natural flood management methods should be used due to their multiple benefits for flood storage, recreation and habitat creation.
- 44.11** London Plan Policy GG6 on 'Increasing efficiency and resilience' sets a requirement for those involved in development and planning to guarantee that buildings and infrastructure are designed to adapt to climate change, reduce flooding impacts and utilise water efficiently.

44.B Context for Sutton

Strategic Flood Risk Assessment Level 1 Report

44.12 The Council has commissioned an SFRA to be undertaken by consultants to inform Sutton's new Local Plan. The SFRA Level 1 Report (Metis Ltd, December 2023) provides a strategic overview for all sources of flood risk within the borough based on the latest available data together with updated planning policy advice.

44.13 The flood risk maps set out above under Issue 4 on Flood Risk Management have been used by the Council as the basis for undertaking the sequential test on potential site allocations as part of the sustainability appraisal (SA) process. The document also provides updated development management guidance on the content of site specific FRAs, including further details of sequential test and exception test requirements.

44.14 A Level 2 SFRA Report will be prepared prior to the submission of the Local Plan Review. For all proposed site allocations located within higher flood risk areas and for which the exception test will need to be demonstrated, the Level 2 Report will contain detailed map-based information on flood risk, flood depth and flood hazards across each site and recommendations on how they could be potentially be developed safely taking account of the vulnerability of the proposed use.

Dwellings at risk from fluvial flooding

44.15 The estimated number of dwellings at risk of fluvial flooding is set out in Table 44.1 below based on revised Environment Agency modelling undertaken for the Wandle flood risk extents (undefended) taking account of the latest modelling for the Wandle undertaken in May 2015.

Figure 44.1: Dwellings at risk from fluvial flooding

EA Flood Zone	Flood Risk	% of borough	No. of Dwellings
Flood Zone 1 (low risk)	Less than 1 in a 1000 annual probability of flooding (<0.1%)	96.3%	76,352
Flood Zone 2 (low risk)	Between 1 in a 100 and 1 in a 1000 annual prob of flooding (1% - 0.1%)	2.4%	1,889
Flood Zone 3a (high risk)	More than 1 in a 100 annual probability of flooding (>1%)	1.0%	822
Flood Zone 3b (fluvial floodplain)	More than 1 in 20 annual probability of flooding (>5% 'defended')	0.2%	198

Surface Water Flooding

44.16 Sutton's Surface Water Management Plan (SWMP) was first published in October 2011 as part of the Drain London project, and was subsequently updated in 2019. The SWMP outlines the Council's preferred strategy for managing surface water flood risk across the borough based on updated information from historic flooding

events, resident surveys, and hydraulic modelling completed since the initial SWMP. Based on updated modelling, a total of 5,217 properties are currently predicted to be at risk from a 1 in 100-year surface water flood event across the borough.

44.17 As part of a new approach to identifying surface water flood risk, the 2019 SWMP identified ten Surface Water Catchments and 26 Sub-Catchments as shown in Appendix 10, Map 10.4. Each of the Catchments are broken down further into Sub-Catchments based on the surface water sewer network, with each Sub-Catchment representing a distinct contributing area within the wider hydrological catchment. For each Sub-Catchment, additional Hotspots (defined as areas with ≥ 10 residential properties that fall within the 1 in 100 year [1% AEP] surface water flood event modelled extent) were identified and mapped in the SWMP report. The report highlights potential mitigation options for each Sub-Catchment that could be incorporated into future flood alleviation alongside the SFRA recommendations to improve alignment with Sutton Council's flood risk management approaches.

Towards a Policy Approach

44.18 Based upon the evidence and analysis, the Council considers that it can move directly towards a draft policy approach for consideration as part of this Regulation 18 consultation. The draft policy is as follows::

44.C Draft Policy 44 on Flood Risk Management and Flood Resilience

- (a) Proposed developments must avoid or minimise all sources of flood risk to people and property and manage residual risk, taking account of climate change, without increasing flood risk elsewhere by:
 - (i) Avoiding inappropriate development in flood risk areas in line with the 'sequential' test, including within Flood Zones 2 and 3 and within areas at higher risk of surface water flooding identified in Sutton's strategic flood risk assessment (SFRA), taking account of government vulnerability classifications and flood zone compatibility guidelines.
 - (ii) Where it is not possible for the proposed development to be located within areas at lower risk of flooding, demonstrating that the following criteria are met in line with the Government's 'exceptions test' (1) the development would provide wider sustainability benefits to the community that outweigh the flood risk; and (2) the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.
 - (iii) Applying a 'sequential approach' to site layout in line with Government Planning Practice Guidance by locating the most vulnerable elements/uses of the proposed development within areas of lowest flood risk where possible.
 - (iv) Ensuring that allocated sites in flood risk areas are developed having regard to the flood risk information and guidance contained in the SFRA Level 2 Report or the latest available flood risk information where SFRA Level 2 data may be superseded.

- (v) Ensuring that all buildings, parking areas and ancillary structures such as bike/bin stores are set back at least 8 metres from the banks of main rivers and 5 metres from the banks of ordinary watercourses to allow improvements and maintenance of land drainage, improve the ecological functioning of river corridors and enhance local amenity.
 - (vi) Ensuring that proposed developments located within Flood Zones 2 or 3 and which are classified as ‘more vulnerable’, ‘less vulnerable’ or ‘water compatible’, including changes of use and residential extensions, comply with Environment Agency standing advice for vulnerable developments or for minor extensions under 25m² as appropriate, and that residual risks are managed in accordance with national guidance on flood resistance and resilience measures²⁷ and the ‘property flood resilience code of practice’ published by CIRIA.
- (b) All planning applications meeting one or more of the following criteria as set out in the NPPF must be accompanied by a site-specific flood risk assessment (FRA):
- Proposed new-build developments or extensions located on sites within Flood Zones 2, 3 or 3b.
 - Proposed new-build developments or extensions located within Flood Zone 1 where (1) the site area is 1 hectare or more, and/or (2) the site is at higher risk of surface water flooding as identified in Sutton’s SFRA Level 1 Report²⁸.
 - Proposed changes of use which both increase the development’s vulnerability classification and which are located within Flood Zones 2, 3 or 3b and/or an area at higher risk of surface water flooding as identified in Sutton’s SFRA Level 1 Report.
- (c) Site specific FRAs submitted in support of planning applications must assess all sources of flood risk to and from the development and show how these risks will be managed, taking climate change into account, in line with the minimum requirements set out in the government’s planning practice guidance on flood risk, environment agency standing advice and relevant flood risk information and technical guidance contained in Sutton’s SFRA Level 1 and Level 2 Reports.
- (d) All development proposals for public utility services must be designed to remain operational under flood conditions and buildings must be designed for quick recovery following a flood event.
- (e) All development proposals must be set back from flood defences to allow for any foreseeable future maintenance works and be designed to protect their integrity.

44.D Regulation 18 Consultation Questions



- A. Do you agree with the draft policy on Flood Risk Management and Flood Resilience?
- B. If you do not support the provisions of the draft policy, please give reasons and where possible suggest alternatives.

²⁷ see British Standard 851188-1:2019+a1:2021 available at <https://standardsdevelopment.bsigroup.com/projects/2021-01775#/section>
²⁸ or the latest available flood risk information where SFRA Level 1 data may be superseded

Issue 45 - Sustainable Drainage (SuDS)

45.A Introduction

- 45.1** Sustainable drainage (SuDS) measures seek to mimic nature and manage rainfall close to where it falls in order to manage surface water flood risk while delivering multiple benefits for water quality, biodiversity, urban greening and local amenity.
- 45.2** Source control SuDS measures, such as green roofs, rainwater harvesting, permeable paving and other permeable surfaces, manage rainfall close to where it falls through attenuation (slowing), treatment and infiltration (where soil conditions allow). Conveyance measures, including swales and channels, enable the transfer of surface water run-off across a site between different SuDS components and can also provide a degree of storage and/or infiltration.
- 45.3** Filtration SuDS such as filter strips, filter drains/ trenches and bioretention areas help to remove pollutants and sediment from surface water runoff as well as providing some attenuation and storage. Infiltration SuDS, such as rain gardens and soakaways, work by allowing runoff to infiltrate (soak) into the ground subject to prevailing geological conditions.
- 45.4** The NPPF (2023) requires that major developments should incorporate SuDS measures on the basis of advice provided by the Lead Local Flood Authority (LLFA) (the statutory consultee), have appropriate minimum operational standards and maintenance arrangements and deliver multiple benefits where possible.
- 45.5** The Government's Non-Statutory Technical Standards for SuDS (DEFRA, 2015) states that for greenfield developments, the peak runoff rate from the development to any highway drain, sewer or surface water body for the 1 in 1 year rainfall event (100% AEP) and the 1 in 100 year rainfall event (1% AEP) should never exceed the peak greenfield runoff rate for the same event. On previously-developed sites, the peak runoff rates must be as close as reasonably practicable to the greenfield runoff rate but should never exceed the run-off rate for the site prior to redevelopment for that event.
- 45.6** London Plan Policy SI13 on 'Sustainable drainage' requires development proposals to manage surface water runoff as close to its source as possible and aim to achieve greenfield run-off rates in accordance with the following drainage hierarchy:
- (i) rainwater use as a resource (for example rainwater harvesting, blue roofs for irrigation);
 - (ii) rainwater infiltration to ground at or close to source;
 - (iii) rainwater attenuation in green infrastructure features for gradual release (for example green roofs, rain gardens);
 - (iv) rainwater discharge direct to a watercourse (unless not appropriate);
 - (v) controlled rainwater discharge to a surface water sewer or drain; and
 - (vi) controlled rainwater discharge to a combined sewer.

- 45.7** Impermeable surfacing, including on front gardens and driveways, should normally be resisted and proposed site drainage strategies should prioritise the use of nature-based SuDS measures in seeking to deliver multiple benefits not only for flood risk management but for urban greening, cooling, biodiversity, water quality and local amenity.
- 45.8** Amongst other available urban greening measures, such as green roofs and tree planting, the importance of nature-based SuDS measures as an integral part of site layout and building design is further emphasised in London Plan Policy G5 on ‘Urban Greening’.
- 45.9** The London Sustainable Drainage Action Plan sets out the Mayor’s long-term strategy for delivering SuDS retrofit measures to land, buildings and infrastructure across the capital and identifies appropriate options for a range of urban settings, including as part of highway and transport schemes, town centres, industrial areas, open spaces and housing. The Mayor’s sustainable drainage vision is that *“By 2040, London will manage its rainwater more sustainably to reduce flood risk and improve water quality and security. This will maximise the benefits to people, the environment and the economy”*.

45.B Context for Sutton

- 45.10** Sutton is designated as a Lead Local Flood Authority (LLFA) under the Flood and Water Management Act 2010 (the Act). As an LLFA, the Council may carry out management of local flood risk (i.e. from surface water, groundwater and ordinary watercourses) within the borough, must cooperate with other relevant authorities including the Highways Authority (a Council function and TfL), the Environment Agency and Thames Water Utilities Ltd, must prepare a Local Flood Risk Management Strategy (LFRMS) and maintain a flood risk asset register.
- 45.11** Schedule 3 of the Act, which has yet to be enacted, sets out a framework for approving and adopting drainage systems, consisting of a SuDS Approving Body (SAB) and national SuDS standards. A recent Government review has recommended SuDS to become mandatory for all new developments and the implementation of Schedule 3 is currently scheduled for 2024.
- 45.12** One of the key ambitions of Sutton’s Climate Emergency Response Action Plan is to progress flood alleviation schemes in priority areas in line with the Council’s LFRMS and Action Plan (2023). Key schemes which are either being developed include the Worcester Park flood alleviation scheme (consisting of a proposed wetland and dry basins that will attenuate storm water before releasing it back into the Thames Water Utilities Ltd sewer network at a controlled rate); the Beddington catchment scheme and the proposed Rosehill Park flood alleviation scheme.
- 45.13** The Council’s updated Surface Water Management Plan 2019 provides a comprehensive assessment of surface water risk across the borough, flood risk ‘hotspots’, properties at risk, current progress and mitigation options by sub-catchment.

45.14 The Council, in its role as a LLFA, has adopted the GLA's Drainage Assessment Form (DAF) which must be completed as part of SuDS strategies prepared in support of all planning applications for major residential and non-residential developments.

Towards a Policy Approach

45.15 Based upon the evidence and analysis, the Council considers that it can move directly towards a draft policy approach for consideration as part of this Regulation 18 consultation. The draft policy is as follows:

45.C Draft Policy 45 on Sustainable Drainage (SuDS)

- (a) All proposed residential and commercial developments involving a net increase in building footprint, including major refurbishments, changes of use and residential conversions, must incorporate effective sustainable drainage (SuDS) measures as part of the design and layout of the development in order to manage surface water run-off as close to its source as possible and achieve the following minimum performance standards in accordance with the Mayor's drainage hierarchy:
 - (i) For greenfield sites, ensure that peak run-off rates for all storm events up to and including the 1 in 100 year rainfall event (plus climate change) never exceed greenfield run-off rates for the same event.
 - (ii) For previously developed sites, aim to ensure that peak run-off rates for all storm events up to and including the 1 in 100 year rainfall event (plus climate change) achieve greenfield run-off rates for the same event, unless it can be demonstrated that all opportunities to minimise final site run-off, as close as reasonably practicable to greenfield runoff rates, have been taken in line with the Mayor's drainage hierarchy.
 - (iii) Ensure that the site drainage strategy can contain the 1 in 30 year event (plus climate change) without flooding and that any flooding occurring between the 1 in 30 and 1 in 100 year event (plus climate change) will be safely contained on site (including any run-off from neighbouring land).
- (b) All planning applications involving the creation of (i) at least one net additional dwelling (ii) at least 1,000m² net additional commercial floorspace; or (iii) a residential extension located within an area of surface water flood risk and for which Government Standing Advice is applicable, must be accompanied by details of the proposed SuDS strategy prepared by an appropriately qualified professional, either as part of a site specific flood risk assessment (FRA) or as a separate document. As a minimum, submitted SuDS strategies must include:
 - (i) Details of each SuDS measure and a site plan showing the proposed layout of the site drainage scheme. All drawings to be 'final drawings' not 'preliminary' or 'draft' unless further details are to be submitted via discharge of condition.
 - (ii) Evidence to show how the Mayor's drainage hierarchy has been applied.
 - (iii) Confirmation of permission to connect any discharge points into an open watercourse or sewer network.
 - (iv) How blue and green infrastructure and other nature-based SuDS solutions have been considered; and how the use of impermeable paving has been avoided.
 - (v) Surface water calculations to demonstrate that the Council's minimum SuDS

performance standards in Part (a) will be met. All major development proposals must also be accompanied by a completed Sutton Drainage Assessment Form (DAF).

- (vi) Where relevant, the outcome of infiltration testing to Building Research Establishment (BRE) Digest 365 standards or equivalent.
- (vii) Details of how each SuDS measure will be managed and maintained throughout its lifetime, including arrangements for adoption.
- (viii) Exceedance flow paths for surface water for events greater than the 1 in 100 year event (plus climate change).
- (xv) Evidence to show how the proposed SuDS strategy will deliver multiple benefits for urban greening, habitats and biodiversity net gain, water quality, local amenity and recreation in accordance with the aims of Local Plan Policies 5 on 'Urban Greening and Climate Change Adaptation' and 6 on 'Biodiversity and Habitats'.

For surface water flooding extents, surface water catchments and identified surface water flooding hotspots see the Local Plan Appendix and Policies Map.

45.D Regulation 18 Consultation Questions



- A. Do you agree with the draft policy on Sustainable Drainage (SuDS)?
- B. Do you agree with the application types / sizes that this would apply to?
- C. If you do not support the provisions of the draft policy, please give reasons and where possible suggest alternatives.

Issue 46 - Basement Developments

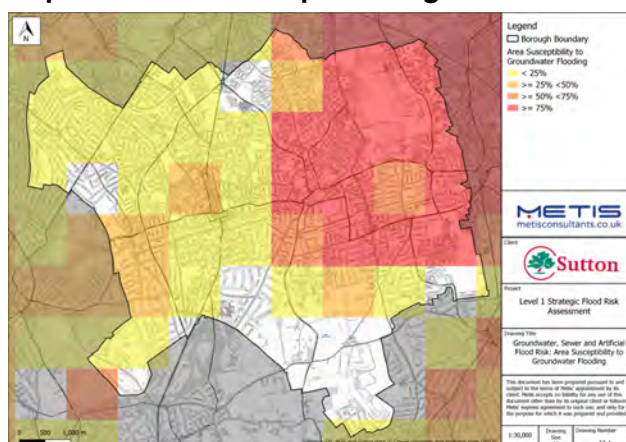
46.A Introduction

- 46.1** Basement developments are defined in the Building Regulations as developments including a basement storey where part of it is at least 1.2m below the adjoining ground level and by their nature are inherently more at risk of flooding from all sources. The NPPF (2023) defines basement dwellings (including subterranean residential extensions) as 'highly vulnerable' and should therefore not be permitted in Flood Zones 3a or 3b in line with Government PPG on flood risk. Other basement developments, where they are proposed for non-residential uses, are classified as 'less vulnerable' or 'water compatible'.
- 46.2** Government PPG requires that all basement rooms must have internal access and egress to a higher floor situated above the design flood level (1 in 100 year plus climate change) which can be used as part of emergency evacuation procedures. All basements, including vents and lightwells that could allow water inundation, must have access thresholds 300mm above the design flood level. Evidence in the form of on-site borehole investigations needs to be submitted to confirm the local water table level as part of any assessment. A basement impact assessment (BIA) is required for new and existing basement dwelling proposals where there is evidence of flood risk from surface water, groundwater and/or sewer flooding in the area. Flood resistance and mitigation measures proposed for such developments must demonstrate that the basement will not be impacted by flooding from any source and that the development will not have any adverse impacts on local hydrogeology.

46.B Context for Sutton

- 46.3** Areas susceptible to groundwater flooding are shown in Map 46.1 below.

Map 46.1 Areas susceptible to groundwater flooding



Towards a Policy Approach

- 46.4** Based upon the evidence and analysis, the Council considers that it can move directly towards a draft policy approach for consideration as part of this Regulation 18 consultation. The draft policy is as follows:

46.C Draft Policy 46: Basement Developments

- (a) The Council will not permit proposed self-contained basement dwellings or new basements forming part of a residential extension within Environment Agency Fluvial Flood Zones 3a or 3b.
- (b) Proposed self-contained basement dwellings located within EA Fluvial Flood Zone 2 and/or within surface water flood zones 3a or 3b as defined in Sutton's Strategic Flood Risk Assessment (SFRA) must demonstrate compliance with the sequential test based on Government vulnerability classifications and flood zone compatibility guidelines.
- (c) Where it is not possible for a proposed self-contained basement dwelling to be located within areas at a lower risk of flooding, the following criteria must be demonstrated in line with the Government's 'exceptions test':
 - (i) provision of wider sustainability benefits that outweigh the flood risk; and
 - (ii) safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, reducing flood risk overall
- (d) All proposed self-contained basement dwellings or new basements forming part of a residential extension must:
 - (i) have internal access and egress to a higher floor situated above the design flood level (1 in 100 year fluvial event plus climate change) which can be utilised for emergency evacuation;
 - (ii) have access thresholds 300mm above the design flood level;
 - (iii) avoid the introduction of vents or light wells that could allow water inundation or ensure that these have thresholds raised above the design flood level.
- (e) All proposed self-contained basement dwellings or new basements forming part of a residential extension must be accompanied by a basement impact assessment (BIA) prepared by an qualified professional, either as part of a site-specific flood risk assessment (FRA) or as a separate document including:
 - (i) site plans and elevations showing the sub-surface structure and the design and layout of the proposed basement;
 - (ii) a programme of enabling works, construction and restoration;
 - (i) a detailed geo-technical site investigation including site topography and borehole information to establish geological conditions on or close to the development site; the site's infiltration potential and local groundwater levels;
 - (iii) details of any proposed flood resistance, resilience or mitigation measures, such as underground corridors with high permeability or sub-surface drainage systems
 - (iv) evidence to demonstrate that the proposed basement will not be impacted by flooding from any source during the design flood event and will not have any adverse impacts on local hydrogeology;
 - (v) evidence to demonstrate that the potential adverse impacts on neighbouring properties and the wider environment is low, including in relation to flood risk, water quality, hydrology and land stability.

For Environment Agency Flood Zones see the Local Plan Appendix and Policies Map.

46.D Regulation 18 Consultation Questions



- A. Do you agree with the draft policy on Basement Development?
- B. If you do not support the provisions of the draft policy, please give reasons and where possible suggest alternatives.

Issue 47 - Air Quality

47.A Introduction

- 47.1** Poor air quality arising from elevated levels of nitrogen dioxide (NO₂), particulates (PM10s and PM2.5) and other harmful pollutants has significant adverse impacts on the health, quality of life and life expectancy of Londoners. Air pollution, particularly near major roads, has a disproportionate impact on vulnerable groups, such as young children, older people and people suffering from long-term conditions such as asthma or heart disease. There is a strong linkage with equality issues, because neighbourhoods with poor air quality are typically more socially deprived. The annual health costs of air pollution in the UK is estimated at roughly £15 billion.
- 47.2** The UK Clean Air Strategy 2019 provides the overarching strategic framework for air quality management in the UK and contains national air quality standards and objectives established by the Government to protect human health.
- 47.3** The NPPF (2023) requires that Local Plans should contribute to and enhance the quality of the natural and local environment by preventing new and existing developments from contributing to or being adversely affected by unacceptable levels of air pollution. Planning policies and decisions should ensure compliance with relevant limit values or national targets and be consistent with local air quality action plan objectives, taking account of Air Quality Management Areas (AQMAs) and cumulative impacts. Opportunities to improve air quality or mitigate its impacts should be identified, including through traffic management, limiting the need to travel by focusing travel generating development in sustainable locations and by promoting green infrastructure.
- 47.4** The Mayor's Environment Strategy 2018 includes a commitment to making air quality in London the best of any major world city. This means not only complying with legal limits for NO₂ as soon as possible but also achieving World Health Organisation (WHO) targets for other pollutants such as for particulates. The Mayor's report on 'Improving London's air quality'²⁹ published in October 2020 identified that a significant improvement had occurred since 2016, partly arising from policies such as the introduction of the Ultra-Low Emission Zone (ULEZ) in central London and the introduction of Low Emission Bus Zones.
- 47.5** In 2016, two million Londoners, including 400,000 children, lived in areas that exceeded legal limits for NO₂, with thousands dying prematurely every year due to exposure to air pollution. By 2019, this had reduced to 119,000 people, a reduction of 94%. The number of state primary and secondary schools in areas exceeding the legal limit for NO₂ fell from 455 in 2016 to 14 in 2019 (97% reduction). In 2016, monitoring sites recorded over 4,000 hours above the short-term legal limit for NO₂. In 2019 this reduced to around 100 (97% reduction). The expansion of ULEZ in 2023 to include outer London boroughs including Sutton is expected to deliver further improvements.

²⁹ Transport for London (TfL) Travel in London Report 13 available at <http://content.tfl.gov.uk/travel-in-london-report-13.pdf>

- 47.6** London Plan Policy SI 1 on ‘Improving air quality’ states that Local Plans should seek opportunities to deliver further improvements to air quality and should not reduce any benefits resulting from the Mayor’s or boroughs’ activities to improve air quality. Part (B) 1 of this policy requires that developments should not lead to a further deterioration of existing poor air quality³⁰; create new areas that exceed air quality limits; or create unacceptable risk of high levels of exposure to poor air quality. Part (B) 2 requires that development proposals must be at least ‘Air Quality Neutral’ and incorporate design solutions to prevent or minimise increased exposure to existing air pollution, particularly for development proposals located within Air Quality Focus Areas or that are likely to be used by groups vulnerable to poor air quality, such as children or older people.
- 47.7** The Mayor’s Air Quality Neutral London Plan Guidance (LPG) consists of two sets of benchmarks covering the two main sources of air pollution from new developments. A development must meet both benchmarks separately in order to be air quality neutral:
- Building Emissions Benchmark (BEB) - emissions from equipment used to supply heat and energy to the buildings; and
 - Transport Emissions Benchmark (TEB) - emissions from private vehicles travelling to and from the development.
- 47.8** Large scale developments subject to Environmental Impact Assessment (EIA), subject to a Masterplan/development brief, or otherwise referable to the Mayor are expected to achieve ‘air quality positive’ standards in line with the Mayor’s Air Quality Positive LPG (2023). Many other London Plan policies are linked to an air quality positive approach, including healthy streets and urban greening.
- 47.9** While calculations against the benchmarks should inform the design process, final Air Quality Assessment can only be prepared for submission at the planning application stage once the energy statement and transport strategy for a proposed development have been suitably finalised.

47.B Context for Sutton

Sources of air pollution in Sutton

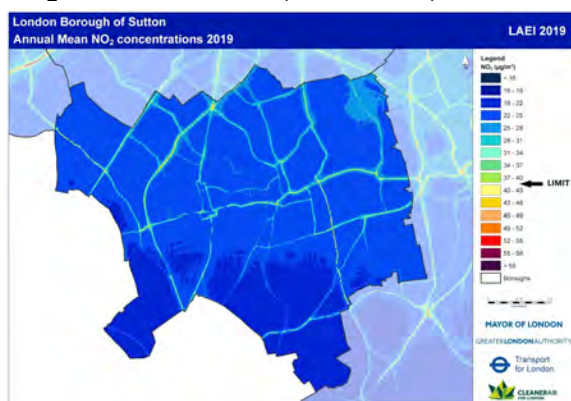
- 47.10** Air pollution within the London Borough of Sutton comes from many sources, including from outside the borough boundaries and, in the case of particulates, a significant proportion of this comes from outside of London. According to the London Atmospheric Emissions Inventory (LAEI) 2019, the main sources of NO₂ emissions within the borough are from road transport (35%), industrial processes (36%) and from heat and power generation (23%), while particulates (PM10s and PM2.5) originate mainly from road transport (28%), construction (27%) and domestic biomass (12%).

³⁰ areas of existing poor air quality are defined in the London Plan as areas where legal limits for any pollutant, or World Health Organisation targets for particulate matter, are already exceeded and areas where pollution levels are within 5% of these limit

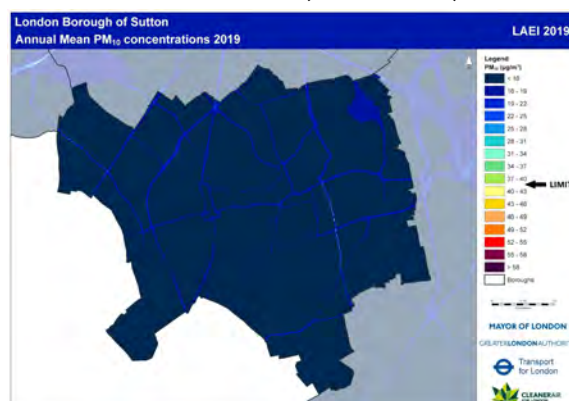
Borough-wide air pollution modelling

47.11 Map 47.1 shows annual mean concentrations of NO₂ based on modelling data from the London Atmospheric Emissions Inventory (LAEI) 2019. Map 47.2 shows annual mean concentrations of particulates (PM10).

Map 47.1 Modelled map of annual mean NO₂ concentrations (LAEI 2019)



Map 47.2: Modelled map of annual mean PM10 concentrations (LAEI 2019)



Automatic Monitoring Sites

47.12 There are four automatic air pollution monitoring sites within the borough: at Wallington, Beddington Lane North, Beddington Village and at Worcester Park. The latest available annual monitoring results and compliance against national air quality objectives for NO₂ are set out below in Table 47.1.

Table 47.1: Nitrogen dioxide (NO₂) monitoring sites

Pollutant	National Air Quality Objective/Target	2021		2022	
		Indicator	Met?	Indicator	Met?
WALLINGTON (ST4)					
Nitrogen dioxide (NO ₂)	40 µg/m ³ as annual mean	43 µg/m³	No	44 µg/m³	No
	200 µg/m ³ as 1 hour mean no more than 18 times/year	1 time	Yes	0 time	Yes
BEDDINGTON LANE NORTH (ST5)					
Nitrogen dioxide (NO ₂)	40 µg/m ³ as annual mean	22 µg/m³	Yes	24 µg/m³	Yes
	200 µg/m ³ as 1 hour mean no more than 18 times/year	0 times	Yes	0 times	Yes
BEDDINGTON VILLAGE (ST5)³¹					
Nitrogen dioxide (NO ₂)	40 µg/m ³ as annual mean	24 µg/m³	Yes	25 µg/m³	Yes
	200 µg/m ³ as 1 hour mean no more than 18 times/year	0 times	Yes	0 times	Yes
WORCESTER PARK (ST6)					
Nitrogen dioxide (NO ₂)	40 µg/m ³ as annual mean	43 µg/m³	No	40 µg/m³	Yes
	200 µg/m ³ as 1 hour mean no more than 18 times/year	0 times	Yes	0 times	Yes

Source: LB Sutton Air Quality Status Report and Environmental Research Group, King's College London³¹

³¹ for Beddington Village) in 2021, the capture rates for NO₂ were less than 90% (13% and 89%) – results are indicative only

Air Quality Management Areas (AQMAs) and Air Quality Focus Areas (AQFAs)

47.13 In 2013, an Air Quality Management Area (AQMA) was declared across the entire borough for the following reasons:

- NO₂ - because levels of this pollutant were continuing to fail the relevant national targets and air quality modelling indicated that these targets were likely to be breached at a number of other locations;
- Particulates (PM10s and PM2.5) - because although levels of these pollutants were meeting national targets, they were continuing to fail WHO guidelines.

47.14 Air Quality Focus Areas (AQFA) are defined as locations that not only exceed the relevant annual mean limit values for NO₂ but are also locations with high human exposure. 187 AQFAs across London were designated by the Mayor in 2013, including the following three in LB Sutton:

- Sutton Town Centre (A232 Cheam/Carshalton Road/ High St/ Brighton Road);
- Wallington (Manor Road/ Stanley Park Road/ Stafford Road); and
- Worcester Park (Central Road/ Cheam Common Road).

Sutton's Air Quality Action Plan (AQAP)

47.15 Sutton's draft Air Quality Action Plan (AQAP) 2024-29 identifies the actions the Council intends to deliver over the next 5 years in order to improve air quality within the borough and has been prepared to meet the legal requirement on the local authority to work towards air quality objectives under Part IV of the Environment Act 1995. It replaces the previous Sutton AQAP 2019-23 during which the following schemes were delivered:

- provision of infrastructure to encourage a switch to walking and cycling;
- 10 permanent school streets introduced with further school streets planned;
- adoption of the updated borough Sustainable Transport Strategy Supplementary Planning Document (SPD) in November 2021;
- dockless electric bike hire scheme introduced;
- installation of ultra low emission vehicle infrastructure throughout the borough.

47.16 According to London-wide research undertaken by Imperial College London in 2020³², the equivalent mortality burden³³ attributable to human-made PM2.5 and NO₂ in LB Sutton was 7.4%, the fourth lowest in London. While current national objectives for particulates (PM10 and PM2.5) are being met, the legal target for PM2.5 is much higher than the relevant WHO guideline. For this reason, a key focus of Sutton's updated AQAP is to help the Mayor achieve the target of meeting WHO limit values for PM2.5 across London by 2030 in line with the aims of the London Environment Strategy 2018.

47.17 Many of the Council's proposed AQAP actions for improving local air quality can either be delivered directly or significantly influenced by Local Plan policies , including:

- ensuring that polluting emissions from new developments are minimised by requiring Air Quality Assessments and Construction Management Plans to be prepared for approval in support of major planning applications in line with the London Plan 2021 and Sutton's Sustainable Transport Strategy SPD 2021;

³² Air Quality Information for Public Health Professionals – London Borough of Sutton

https://www.london.gov.uk/sites/default/files/sutton_air_quality_for_public_health_professionals.pdf

³³ this calculation includes deaths from all causes including respiratory, lung cancer and cardiovascular disease.

- applying London Plan Air Quality Neutral policies to proposed major developments and ‘healthy streets’ principles in order to mitigate the potential impacts of development on air quality and to protect the health and amenity of the borough’s population;
- reducing NO₂ emissions from gas-fired combined heat and power (CHP) plants (and gas boilers) serving new and existing developments;
- promoting active and sustainable forms of travel such as walking and cycling and reducing the need to travel by locating major travel generating developments in sustainable locations; and
- promoting urban greening and planting as part of new developments and public realm interventions through applying the green space factor (GSF), nature-based SuDS measures and biodiversity net gain (BNG).

Towards a Policy Approach

47.18 Based upon the evidence and analysis, the Council has established policy options for consideration as part of this Regulation 18 consultation. These are:

47.C Draft Policy 47 on Air Quality

- (a) As a minimum, all developments must demonstrate that the proposed use and any additional traffic movements likely to be generated it will not lead to a further deterioration of existing poor air quality; create any new areas that exceed national air quality objectives and/or World Health Organisation guidelines for nitrogen dioxide (NO₂) or particulates (PM10 and PM2.5) ; or create an unacceptable risk of high levels of exposure to poor air quality.
- (b) All development proposals must be at least ‘Air Quality Neutral’ with respect to NO₂ emissions and particulates (PM10 and PM2.5) as defined by the Mayor’s Air Quality Neutral LPG 2023 as amended and demonstrate through the preparation of an AQN assessment that both of the following Mayoral benchmarks will be met:
 - the Building Emissions Benchmarks (BEB) in Table 3.1 of the LPG covering emissions arising from equipment used to supply heat and energy to the buildings;
 - the Transport Emissions Benchmark (TEB) in Table 4.1 of the LPG – emissions from private vehicles travelling to and from the development.
- (c) Minor development proposals incorporating new heating systems will be assumed to meet the BEB if the proposed heating system is a heat pump or other zero-emission heat source; the new heating system includes one or more individual gas boilers with NO_x emissions rated at less than 40 mg/kWh; and/or the development is connecting to an existing heat network. Major development proposals which meet the Mayor’s definition of ‘car-free’ and minor developments which do not exceed the maximum parking standards set out in Policies T6 and T6.1 to T6.5 of the London Plan 2021 will be assumed to meet the TEB.=
- (d) Each of the following development types must demonstrate compliance with the Mayor’s Air Quality Positive benchmarks in line with the Mayor’s Air Quality Positive LPG.

Preferred Policy Option 1 - Air Quality Positive standards are required for large-scale developments and for other major developments located within Air Quality Focus area

Criterion	Development types required to demonstrate compliance with the Mayor's Air Quality Positive benchmarks under Preferred Policy Option 1
Referable	All planning applications which are referable to the Mayor
Requiring EIA	All large-scale proposals requiring Environmental Impact Assessment (EIA)
Planning brief	All large scale proposals which are the subject of a planning brief;
AQFA	All major development proposals located within Air Quality Focus areas.

Policy Option 2 - Air Quality Positive standards for large-scale developments only

Criterion	Development types required to demonstrate compliance with the Mayor's Air Quality Positive benchmarks under Policy Option 2
Referable	All planning applications which are referable to the Mayor
Requiring EIA	All large-scale proposals requiring Environmental Impact Assessment (EIA)
Planning brief	All large scale developments which are the subject of a planning brief; and

- (e) All major planning applications for major residential or commercial developments together with all minor developments located in designated Air Quality Focus Areas and which do not fall within the scope of Part (c) of this Policy, must be accompanied by a full Air Quality Assessment, which identifies:
- the most significant sources of existing air pollution in the area and constraints;
 - proposed design measures to minimise polluting emissions, improve air quality and reduce exposure, particularly for vulnerable groups;
 - an assessment of the impacts on local air pollution and on receptors resulting from demolition and/or construction in line with Policy 43f on 'Construction Impacts';
 - an assessment of the impacts on local air pollution and on future occupants of the development including from fixed plant, such as boilers, emergency generators, mobile machinery where relevant and expected transport-related sources;
 - cumulative impacts from other committed developments in the vicinity
 - demonstrate that the relevant BEB and TEB benchmarks for NO₂ and particulates set out in the Mayor's Air Quality Neutral or Air Quality Positive LPG as appropriate.
- (f) All mitigation and design measures necessary to enable a proposed development to achieve the Mayor's 'Air Quality Neutral' or 'Air Quality Positive' criteria as appropriate should be carried out on-site. Off-site measures may be acceptable, provided that equivalent air quality benefits are demonstrated in the area affected by the development.

For Air Quality Focus Areas see London Plan Policy SI 1.

47.D Regulation 18 Consultation Questions



- A. Do you agree with the draft policy on Air Quality?
- B. Which Policy Option (1 or 2) do you prefer and why?
- C. If you do not support the provisions of the draft policy, please give reasons and where possible suggest alternatives.

Issue 48 - Contaminated Land

48.A Introduction

- 48.1** The NPPF (2023) requires that planning policies and decisions should contribute to and enhance the natural and local environment by remediating and mitigating contaminated land where appropriate. Following remediation development land must not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990 and therefore posing an unacceptable risk to human health or the environment.
- 48.2** Land contamination is addressed by a number of different regimes including Part 2A of the Environmental Protection Act 1990 (the Act) and the Environmental Permitting Regulations, under which an environmental permit from the Environment Agency (EA) is normally required to cover the treatment and/or redeposit of contaminated soils. However the planning process also has an important role in addressing contamination issues.
- 48.3** While various sources of information are available which can be used to determine the likelihood of contamination for a particular site within the London Borough of Sutton, including the Council's own survey information collected in accordance with Part 2A of the Act, only a specific investigation can establish whether contamination is likely to be present. Potential developers should seek early engagement with the local planning authority and environmental health departments, particularly where the land is already determined as contaminated. The Act clarifies what level of assessment is needed to support any planning application and the issues that need to be considered in the design and layout
- 48.4** Government planning practice guidance (PPG) indicates that where contamination could be an issue, a site investigation must be prepared to determine the nature and extent of any contamination and the risks it may pose to potential receptors so that these risks can be assessed and reduced to an acceptable level. These must identify the potential pollution sources, pathways and receptors in order to enable the local planning authority to determine whether more detailed investigation is required, or whether any proposed remediation is satisfactory. In the absence of appropriate remediation measures, potential receptors may include future occupants of the site, groundwater source protection zones (SPZs), nearby watercourses and ecological habitats. Screening advice in 'Development of Category 4 Screening Levels for Assessment of Land Affected by Contamination' (DEFRA, 2014) can be used to decide whether land is not contaminated and therefore suitable for use.
- 48.5** As a minimum, a desk study and site walk-over must be submitted at the planning application stage in order to provide a conceptual model of the source of contamination, the pathways by which it might reach receptors and options to show how the identified pollutant/contaminant linkages can be broken. Where planning permission is granted, pre-commencement planning conditions or planning obligations should be used as necessary to require further site

investigations to be carried out, submission of a remediation scheme, scheme implementation and monitoring arrangements.

48.B Context for Sutton

48.6 There are currently 32 'sites of potential concern' within the borough with respect to possible land contamination. Details of these sites can be obtained from the Council's Environmental Protection team.

Towards a Policy Approach

48.7 Based upon the evidence and analysis, the Council considers that it can move directly towards a draft policy approach for consideration as part of this Regulation 18 consultation. The draft policy is as follows:

48.C Draft Policy 48 on Contaminated Land

- (a) All development proposals located on or near potentially contaminated sites must be supported by a preliminary risk assessment, consisting of a desk top study, site walkover report and a conceptual site model, taking account of existing site conditions, available environmental information, previous uses, the groundwater regime, pollution pathways and potential receptors.
- (b) Where necessary, a detailed site investigation must be undertaken prior to construction to assess the nature and extent of contamination, pathways and potential risks to future occupants, groundwater source protection zones (SPZs), nearby watercourses and ecological habitat having regard to EA guidance on 'Managing and reducing land contamination' (EA, 2016), the BSI Code of Practice on the Investigation of Potentially Contaminated Sites (BS10175) or any successor documents; and
- (c) Where unacceptable risks are identified, a proposed remediation scheme, with arrangements for implementation, validation, monitoring and maintenance, must be submitted to the Council. The Council may use conditions or planning obligations as appropriate to ensure that such sites are remediated to the required standard by determining the scope of site investigations and remediation schemes.

48.D Regulation 18 Consultation Questions



- A. Do you agree with the draft policy on Contaminated Land?
- B. If you do not support the provisions of the draft policy, please give reasons and where possible suggest alternatives.

Issue 49 - Noise and Vibration

49.A Introduction

- 49.1** Prolonged exposure to noise can often cause annoyance and/or sleep disturbance, both of which can give rise to adverse impacts on quality of life and health. The Noise Policy Statement for England (DEFRA, 2010) aims to mitigate and minimise adverse impacts on health and quality of life from environmental, neighbour and neighbourhood noise and significant adverse effects should be avoided altogether. These three categories of impact are identified as follows
- environmental noise - mainly noise from road traffic and other transportation;
 - neighbour noise - noise from inside and outside peoples' homes; and
 - neighbourhood noise - noise arising within the community such as industrial, entertainment and business premises, construction sites and street noise.
- 49.2** The NPPF (2023) requires that planning decisions should prevent new and existing development from contributing to or being adversely affected by unacceptable levels of noise; mitigate and reduce to a minimum the potential adverse impacts; and avoid noise giving rise to significant adverse impacts on health and the quality of life. Government PPG requires that noise is considered when a proposed development may create additional noise, or would be sensitive to existing noise sources within the locality, including from future planned activities that are permitted but not yet commenced. Good acoustic design must therefore be considered from the earliest stages of the planning process.
- 49.3** Planning decisions must consider whether or not the overall effect of the resulting noise exposure (including any construction impacts) would be above or below the 'significant observed adverse effect level' set out in the noise exposure hierarchy table included in Government planning practice guidance (PPG) . This provides guidance on the above noise exposure categories and associated mitigation measures based on the likely average response of those affected. Where predicted noise exposure is above this level, adverse impacts must be avoided or minimised as far as possible through appropriate mitigation measures including changes to design and layout. However, the subjective nature of noise means that there is not a simple relationship between noise levels and the impact on those affected. This will depend on how various factors combine in any particular situation, including cumulative impacts, the characteristics of the noise and the time of day.
- 49.4** For noise-generating developments, mitigation options include reducing noise at source and/or containing the noise generated; optimising the distance between the source and noise-sensitive receptors; natural or purpose-built screening measures; restricting noise-generating activities to certain time periods and/or specifying permissible noise levels at different times of day; and noise insulation measures.
- 49.5** London Plan Policy D14 on 'Noise' considers that the management of noise should be an integral part of development proposals and considered as early as possible in the planning process. Amongst other things, development proposals should:
- avoid significant adverse noise impacts on health and quality of life;

- mitigate and minimise the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on existing noise-generating uses;
- separating new noise-sensitive development from major noise sources, such as road traffic, railways lines and some industrial uses, through the use of distance, screening, layout, orientation, uses and materials – in preference to sole reliance on sound insulation; and
- where it is not possible to achieve separation without undue impact on other sustainable development objectives, then any potential adverse effects should be controlled and mitigated through applying good acoustic design principles.

49.6 The London Plan endorses the ‘agent of change’ principle, which places the responsibility for mitigating impacts from existing noise-generating activities or uses on the newly proposed development. This means that existing land uses should not be unduly affected by the introduction of new noise-sensitive uses.

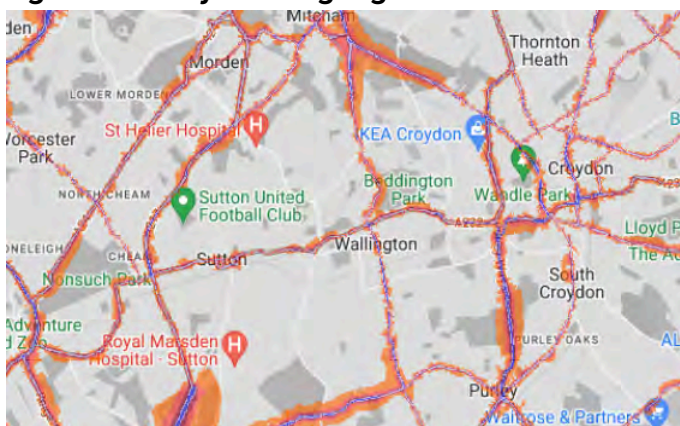
49.7 Managing noise impacts can often depend on good acoustic design. Mitigation measures include locating noise sensitive areas away from the parts of the site most exposed to noise; soundproofing doors, walls, windows, floors and ceilings; planting, soft landscaping, fencing/barriers and solid balconies; and using surfaces that can reduce noise in areas with high traffic volumes. Further guidance can be found in ‘Guidance on sound insulation and noise reduction for buildings’ (BS 8223:2014)³⁴ and Professional Practice Guidance on Planning and Noise 2017³⁵.

49.8 Where noise exposure is predicted to give rise to significant adverse impacts on human health and quality of life, or lead to material changes to behaviour, and no opportunities exist for further mitigation, this situation must be avoided altogether.

49.B Context for Sutton

49.9 Figure 49.1 taken from the England Noise and Air Quality Viewer (Extrium, 2023)³⁶ below shows day-evening-night road traffic noise levels (Lden)³⁷ in the borough.

Figure 49.1 Day-evening-night road traffic noise levels (Lden) in the borough



³⁴ British Standard BS 8223:2014 <https://knowledge.bsigroup.com/products/guidance-on-sound-insulation-and-noise-reduction-for-buildings>

³⁵ the Professional Practice Guidance on Planning and Noise (IA, 2017) is available at <https://www.ioa.org.uk/publications/propg>

³⁶ the England Noise and Air Quality Viewer is available at <http://www.extrium.co.uk/noiseviewer.html>

³⁷ the day–evening–night noise level or L_{den} is a 2002 European standard to express noise level over an entire day

Towards a Policy Approach

49.10 Based upon the evidence and analysis, the Council considers that it can move directly towards a draft policy approach for consideration as part of this Regulation 18 consultation. The draft policy is as follows:.

49.C Draft Policy 49 on Noise and Vibration

- (a) Proposed developments that are likely to generate noise or vibration levels above the 'significant observed adverse effect level' as defined in Government Planning Practice Guidance (PPG) and are likely to affect existing noise-sensitive land uses, such as housing, schools, hospitals, parks and open spaces, will not be permitted unless adequate mitigation or avoidance measures are proposed to reduce adverse impacts to acceptable levels, having regard to the Mayor's Sustainable Design and Construction SPG. Where necessary, the Council may set conditions or negotiate planning agreements in order to reduce noise to acceptable levels and undertake monitoring, taking account of ambient noise levels and local character.
- (b) Proposed noise-sensitive developments should be separated from major noise-generating activities wherever practicable and/or incorporate appropriate acoustic design measures in order to minimise potential noise impacts to acceptable levels in accordance with British Standard BS 8223:2014 'Guidance on sound insulation and noise reduction for buildings' and other sources of best practice.
- (c) All planning applications for noise-sensitive developments located in close proximity to an existing noise-generating activity must be accompanied by a Noise Assessment, which should demonstrate that the overall impacts of noise exposure, including construction impacts, would fall below the 'significant observed adverse effect' levels defined in Government PPG, taking account of proposed design measures.
- (d) Where no opportunities exist for further noise mitigation and having regard to the 'agent of change' principle, planning applications for noise-sensitive developments will not be permitted where existing noise-generating activities are predicted to give rise to significant adverse impacts on human health and quality of life.

49.D Regulation 18 Consultation Questions



- A. Do you agree with the draft policy on Noise and Vibration?
- B. If you do not support the provisions of the draft policy, please give reasons and where possible suggest alternatives.

Issue 50 - Light Pollution

50.A Introduction

- 50.1** Light pollution comprises any adverse effects of obtrusive artificial lighting such as:
- glare - the uncomfortable brightness of a light source viewed against a dark sky;
 - light trespass – the spread of light spillage from the boundary of the property;
 - sky glow - the orange glow seen around urban areas caused by a scattering of artificial light by dust particles and water droplets in the sky.
- 50.2** The NPPF (2023) requires that planning policies and decisions should contribute to and enhance the natural and local environment by limiting the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation. Government Planning Practice Guidance (PPG) recognises that artificial lighting is not always necessary and has the potential to cause light pollution in situations where a proposed development may increase artificial lighting levels, or would be sensitive to prevailing levels of lighting. Such obtrusive lighting either caused by or affecting proposed developments can often be a source of annoyance to people, harmful to wildlife and undermine enjoyment of the night sky.
- 50.3** When assessing whether a proposed development has implications for light pollution, consideration should be given to whether an existing source of artificial lighting makes the proposed location unsuitable, or suitable only with appropriate mitigation. This may arise where the existing source of lighting already has a significant effect on the locality and/or where users of the development may be particularly sensitive to light intrusion. In line with the ‘agent of change’ principle (see under Issue 49 on ‘Noise Pollution’), the onus is on the newly proposed development to put suitable mitigation measures in place to avoid the existing source of artificial lighting having a significant adverse effect on residents or users.
- 50.4** Where a proposed development will introduce a new source of artificial lighting to an area, Government PPG advises that consideration should be given to whether this will materially alter light levels around the site and/or have potential adverse impacts upon the use or enjoyment of nearby buildings or open spaces; safety, for example by creating a hazard for road users; and/or a protected nature conservation site. Wildlife species can be affected by very low levels of light and in many different ways. Such adverse impacts can usually be avoided with careful lamp and luminaire selection and positioning, good design, correct installation and maintenance. Lighting near or above the horizontal should be avoided to reduce glare and sky glow. Another option is to use lighting only when it is required by ensuring it is turned off or dimmed when not required. Particular attention should be given to domestic, shop or office exterior security lights, illuminated signs and floodlighting.
- 50.5** London Plan Policy D8 on ‘Public Realm’ requires that lighting “should be carefully considered and well-designed in order to minimise intrusive lighting infrastructure and reduce light pollution”. Also, the supporting text to Policy D9 on ‘Tall Buildings’ states that “Any external lighting for tall buildings should be minimal, energy efficient and designed to minimise glare, light trespass, and sky glow, and should not negatively impact on protected views, designated heritage assets and their settings, or the

amenity of nearby residents”. Policy S5 on ‘Sports and Recreation Facilities’ requires that such facilities should support the provision of sports lighting within reasonable hours, where there is an identified need for sports facilities, and lighting is required to increase their potential usage, unless the lighting gives rise to demonstrable harm to the local community or biodiversity.

50.B Context for Sutton

50.6 No borough-specific contextual information on light pollution is available.

Towards a Policy Approach

50.7 Based upon the evidence and analysis, the Council considers that it can move directly towards a draft policy approach for consideration as part of this Regulation 18 consultation. The draft policy is as follows:.

50.C Draft Policy 50 on Light Pollution

- (a) All lighting schemes included as part of proposed developments must be carefully designed and properly maintained in order to minimise glare, light trespass and sky glow and minimise the potentially adverse impacts of obtrusive light on local amenity, public safety, the character and appearance of the historic environment, nature conservation sites, ecological habitats and the darkness of the night sky. Particular attention should be given to exterior security lighting, lighting proposed for tall buildings, illuminated advertising and floodlighting;
- (b) All lighting schemes included as part of major development proposals and/or in close proximity to existing sensitive uses must have regard to Guidance Note GN01/21 on ‘The Reduction of Obtrusive Light’ published by the Institution of Lighting Professionals (ILP) in 2021³⁸ and light pollution guidelines in the Mayor’s SPG on Sustainable Design and Construction 2014. Details of proposed measures must be provided through submission of a detailed scheme prior to commencement of the development. Where necessary, the Council may set conditions to control levels of luminance, glare, spillage, angle, lighting type, hours of operation and maintenance arrangements.
- (c) Where there is an existing source of artificial lighting which already has a significant effect on the locality, proposed developments which are likely to be particularly sensitive to obtrusive lighting must incorporate suitable mitigation measures in place in accordance with the agent of change principle in order to avoid the existing source of lighting having a significant adverse effect on residents or users

³⁸ Guidance Note GN01/21 The Reduction of Obtrusive Light (ILP, 2021) is available at <https://theilp.org.uk/publication/guidance-note-1-for-the-reduction-of-obtrusive-light-2021/>

50.D Regulation 18 Consultation Questions



- A. Do you agree with the draft policy on light pollution?
- B. If you do not support the provisions of the draft policy, please give reasons and where possible suggest alternatives.

Key supporting documents

- Sustainable Design and Construction SPG (GLA, 2104)
<https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/london-plan-guidance-and-spgs/sustainable-design-and>
- Guidance Note GN01/21 on 'The Reduction of Obtrusive Light' (ILP, 2021)
- 'Guidelines on consideration of bats in lighting projects' (Eurobats, 2018)
<https://www.eurobats.org/node/1563>;
- 'Bats and artificial lighting in the UK' Guidance Note GN 08/23 (ILP, 2023)
- Society of Light and Lighting (SLL) Code for Lighting' (CIBSE, 2012)
<https://www.cibse.org/knowledge-research/knowledge-portal/sll-code-for-lighting>
- 'SLL Lighting Guide 6: The Exterior Environment' (CIBSE, 2016)
<https://www.cibse.org/knowledge-research/knowledge-portal/lighting-guide-06-the-exterior-environment-2016>
- 'SLL Lighting Guide 15: Transport Buildings (CIBSE, 2017)
<https://www.cibse.org/knowledge-research/knowledge-portal/lighting-guide-15-transport-buildings-2017>

Issue 51 - Construction Impacts

51.A Introduction

- 51.1** In the absence of appropriate mitigation and site management measures, polluting emissions and dust from demolition and construction activities can have significant adverse impacts on nearby sensitive receptors, affecting human health, quality of life and habitats. Such impacts are most heavily felt in areas of high socioeconomic deprivation, and by vulnerable groups such as young children and older people. Dust refers to all airborne particulate matter and can often result in soiling, environmental damage and health impacts from increased PM10 and PM2.5 levels.
- 51.2** In order to ensure that new developments do not create an unacceptable risk of high levels of exposure to air pollution, London Plan Policy SI 1 (d) on 'Air Quality' requires that major proposals should demonstrate how they will reduce polluting emissions and dust arising from demolition and construction and comply with the Non-Road Mobile Machinery (NRMM) Low Emission Zone³⁹ in line with best practice (see also Issue 53).
- 51.3** The Mayor's Supplementary Planning Guidance (SPG) on 'Sustainable Design and Construction' (GLA, 2014) states that developers and contractors should follow the Mayor's SPG on 'The Control of Dust and Emissions during Construction and Demolition' when constructing their development (hereafter referred to as the 'SPG'). Where an Air Quality and Dust Risk Assessment (AQDRA) is prepared (see Issue 47 on Air Quality), the AQDRA should include an assessment of air quality impacts during construction and detailed mitigation methods for controlling dust and polluting emissions. The SPG goes on to provide guidance of how such impacts can be controlled as part of the following areas of activity: demolition; earthworks; construction; trackout; and use of NRMM.
- 51.4** Where an AQDRA is submitted in support of a planning application, it must:
- include a commitment to prepare an Air Quality and Dust Management Plan (AQDMP) for Council approval prior to commencement (secured via Condition);
 - identify and summarise the risk to soiling, health and the natural environment from demolition, earthworks, construction and trackout activities.
 - set out recommended emissions control measures to be implemented; and
 - identify the risk category of the site as the basis for indicating the likely dust emission and control measures required.
- 51.5** The key stages in preparing an AQDRA are as follows:
- Step 1: Screening the need for a detailed assessment by identifying the human and ecological response; assessing the description of proposed activities; and considering the sensitivities of the area;
 - Step 2: Assessing the risk of dust impacts from each activity; consider the potential effects on the nearest receptors; determine the risk (Negligible, Low, Medium and High, based on the scale and nature of the works and the sensitivity of the area; and provide a map of nearest receptors;
 - Step 2A: Defining the potential dust emission magnitude as small, medium or large

³⁹ further Mayoral guidance on NRMM standards applying to LB Sutton (Stage IIIB) is available at <https://www.london.gov.uk/programmes-and-strategies/environment-and-climate-change/pollution-and-air-quality/nrmm>

for each phase of the activity;

- Step 2B Defining the sensitivity of the area (small, medium or large) for each phase of the activity; the sensitivity of receptors (high, medium or low); the sensitivity of people to dust soiling effects and the sensitivity of people to health effects of particulates (PM10);
- Step 2C: Defining the risk of impacts by combining the magnitude of the impacts from Step 2A with the sensitivity from Step 2B to determine the risk of impacts with no mitigation; and summarise the risk of dust impacts for each activity.

51.6 Where planning permission is granted for the proposed development, AQDMPs submitted for approval at the pre-commencement stage should include the following information for each of the activities listed above:

- a summary of the works to be carried out;
- a description of site layout and access;
- an inventory and timetable for all dust and air pollutant generating activities;
- the findings of the Air Quality and Dust Risk Assessment;
- all proposed dust and emission control methods (see Chapter 5 of the SPG);
- summary of monitoring and reporting arrangements.

51.7 A list of commonly employed dust and emission control methods for each activity covered in the Mayor's SPG and further advice can be found in the Institute of Air Quality Management's (IAQM) Guidance on the Assessment of dust from demolition and construction (Vn 2.1, 2023)⁴⁰.

51.8 Further guidance relating specifically to transport related impacts is available in Transport for London (TfL) 'Urban Planning and Construction Guidance for Applicants'. Construction Logistics and Delivery and Servicing Plans (see Issue 53 - Transport Impacts) can have an important role in ensuring that proposed developments adopt best practice standards around safety and environmental performance of vehicles to ensure freight is safe, clean and efficient. These should be monitored and managed throughout the construction and operational phases of the development

51.B Context for Sutton

51.9 There is no available borough-specific information on dust and other polluting emissions from construction sites. However the Council has adopted a joint Code of Practice on the 'Control of pollution and noise from demolition and construction sites'⁴¹ with neighbouring boroughs dating from 2008.

Towards a Policy Approach

51.10 Based upon the evidence and analysis, the Council considers that it can move directly towards a draft policy approach for consideration as part of this Regulation 18 consultation. The draft policy is as follows:.

⁴⁰ the IAQM guidance at <https://iaqm.co.uk/wp-content/uploads/2013/02/Construction-dust-2023-BG-v6-amendments.pdf>

⁴¹ the Council's Code of Practice on the 'Control of pollution and noise from demolition and construction sites' is available at <https://clec.uk/sites/default/files/esconstructioncop.pdf>

51.C Draft Policy 51 on Construction Impacts

- (a) All development proposals must incorporate appropriate mitigation measures to minimise or avoid the adverse impacts of air pollution, dust, odour, noise, vibration, water pollution, soil contamination, carbon dioxide (CO₂) emissions and biodiversity on nearby sensitive receptors arising from demolition; earthworks; construction; trackout; and use of non-road mobile machinery (NRMM).
- (b) All planning applications for major developments within the borough and all minor planning applications within Air Quality Focus Areas must be accompanied by an Air Quality and Dust Risk Assessment in accordance with the Mayor's SPG on 'Control of dust and emissions from construction and demolition'; the IAQM Guidance on the 'Assessment of dust from demolition and construction' and other sources of best practice. Air Quality and Dust Risk Assessments must include:
- a commitment to prepare an Air Quality and Dust Management Plan (AQDMP) for Council approval prior to commencement;
 - identify and summarise the risk to human health, quality of life and the natural environment from demolition, earthworks, construction and trackout activities;
 - identify the risk category of the site and recommended emissions control measures.
- (c) Where planning permission is granted for such developments, the Council will set planning conditions to require that an AQDMP is submitted for approval prior to commencement. The AQDMP may form part of a Construction Environmental Management Plan prepared in line with the Council's Code of Practice on the 'Control of pollution and noise from demolition and construction sites'. The AQDMP must include the following:
- an inventory and timetable for all dust and air pollutant generating activities;
 - the findings of the approved Air Quality and Dust Risk Assessment;
 - details of proposed dust and emission control measures;
 - summary of monitoring and reporting arrangements.
- (d) The Council may use planning obligations through Section 106 in order to require that proposed monitoring and reporting arrangements are put in place; and
- (e) All major developments must achieve Considerate Constructors' Scheme certification.

51.D Regulation 18 Consultation Questions



- A. Do you agree with the draft policy on Construction Impacts?
- B. If you do not support the provisions of the draft policy, please give reasons and where possible suggest alternatives.

Issue 52 - Sustainable Transport Proposals

52.A Introduction

- 52.1** Chapter 9 of the NPPF (2023) reaffirms the need to consider transport issues from the earliest stages of plan making and development proposals, both to assess the potential impact of new development on the transport network and to promote opportunities for use of sustainable modes (walking, cycling and public transport).
- 52.2** Since the Adopted Local Plan was published in 2018, a range of changes to transport policy have been introduced which support these aims. A new Mayors Transport Strategy (MTS) was published in March 2018 with an overarching aim for 80% of all trips in London to be made by sustainable means (walking, cycling and public transport) by 2041. The MTS also set out key goals for: Healthy streets and healthy people; A good public transport experience; and New homes and jobs.
- 52.3** Policy T1 of the new London Plan, published in 2021, stipulates that development plans should support, and proposals facilitate, the above outcome, while making the most effective use of land and reflecting its connectivity and accessibility by public transport (both existing and future). To support this, Policy T2 sets out how development proposals and plans should support the Healthy Streets approach by identifying opportunities to travel more healthily and reduce car dominance.
- 52.4** Policy T3 also expects development plans to safeguard land for public transport, and support a number of proposed transport schemes including the Sutton Link tram extension. However, as noted previously, funding for the latter scheme has been paused indefinitely by TfL following changes to funding for transport schemes in the capital, and rising estimated costs. This has potentially significant implications for both housing development and delivery targets in Sutton and the core MTS outcomes targets we are expected to achieve.
- 52.5** The impact of COVID on the transport network in 2020 has resulted in significant changes to working and leisure travel patterns. The 2021 Census reported large increases in the number of residents in employment working from home compared to the 2011 Census, and fears of COVID transmission on public transport led to a resurgence in private car travel, for which the bus and rail networks are still recovering.

52.B Context for Sutton

- 52.6** Policy 35 of the Adopted Local Plan (2018) included a number of specific local and strategic schemes to support growth and manage traffic and congestion on the local network, as well as supporting new developments such as the London Cancer Hub. Some of the schemes have since been completed, but with changes to priorities, the announcement by Government that a new Special Emergency Care Hospital would also be built alongside the Cancer Hub, and impacts on travel due to

the Covid pandemic, there have been in a number of changes to the list of schemes and their priority, as well as how the proposed benefits would be delivered.

52.7 The impact of the Covid pandemic continues to be felt across the local transport network. While the short term reduction in public transport use has largely recovered, the Census in 2021 recorded a significant increase in the number of Sutton residents working from home to just over 38,000, or 36.5% of the working population. For those still travelling to work the peak hours for public transport use, particularly rail, have spread, and highest concentration of travel takes place from Tuesday to Thursday and on Saturday as workers take advantage of more flexible working and opportunities for leisure travel at weekends.

52.8 These travel pattern changes, along with reductions in TfL funding and other initiatives such as the expansion of the ULEZ to Outer London, mean that many of the schemes put forward as part of the Adopted Local Plan remain relevant but priorities for delivery may change. Because of this the new Local Plan will not contain a list of specific schemes as before, but will highlight areas of the borough where measures are expected to be needed to accommodate future growth. These include:

Table 52.1: Potential Transport and Movement Schemes in Sutton

Area	Potential Schemes and Developments
<p>Sutton Town Centre (see also Issue 9)</p>	<ul style="list-style-type: none"> Proposals to transform the existing gyratory system to make the roads less traffic dominated and more pedestrian and cycle friendly, including measures to encourage shared space, reassignment of priorities and landscape improvements. To include determination of space for public transport to take into account the long term proposals for the Sutton Link tram scheme.
<p>Beddington Lane and Village (see also Issues 11, 24 and 25)</p>	<ul style="list-style-type: none"> Proposals supporting current and future development areas within Beddington Lane to accommodate freight and industrial use, while mitigating impact on Beddington Village and encouraging sustainable travel.
<p>Belmont area and London Cancer Hub Campus. (see also Issue 8)</p>	<ul style="list-style-type: none"> Improved access at Belmont Station to support the rail frequency and capacity improvements secured through the Levelling Up Fund. Develop a sustainable travel network between Belmont Station, Sutton Station and the London Cancer Hub, Special Emergency Care Hospital and Royal Marsden hospital, with improved crossings on Brighton Road and safe walking and cycle routes. Junction and crossing improvements on Brighton Road, Cotswold Road, Chiltern Road and Downs Road, to calm traffic and improve safety and walking, cycling and bus access to health facilities.
<p>Rest of the borough</p>	<ul style="list-style-type: none"> Cross boundary working with TfL, RB Kingston and LB Croydon on improvements to the A232 through Wallington and Carshalton, and the road corridor North Cheam - Worcester Park - Old Malden - A3 Roundabout, to improve traffic flow, bus priority and air quality.

Towards a Policy Approach

52.9 Based upon the evidence and analysis, the Council has established a series of policy principles for consideration as part of this Regulation 18 consultation. These are:

52.C Draft Policy 52 on Transport Proposals

- (a) The Council will promote the development of a healthy, safe, and environmentally friendly transport system that is inclusive, accessible, and affordable for all who live, work, study in, and visit the borough, in accordance with the Healthy Streets guidance.
- (b) Alongside the strategic transport proposals outlined in Issue 7 of this document, the Council will continue to identify local highway and sustainable transport schemes for delivery through the Local Implementation Plan, dedicated challenge funding such as the Levelling Up Fund, or through joint delivery with TfL and neighbouring boroughs. Such schemes will be focused on expanding and enhancing the boroughs transport infrastructure, in order to widen sustainable transport choice, improve safety and support new development.
- (c) Development proposals will therefore be expected to:
 - (i) be integrated effectively alongside, facilitate and improve access to, walking, cycling and public transport networks to reduce reliance on use of private vehicles, while minimising any adverse impact on capacity, quality, accessibility, and safety of the highway network.
 - (ii) for major trip generating developments, be located in town centres and other locations with good public transport accessibility, or take steps to raise the PTAL through improvements to public transport where appropriate.
 - (iii) incorporate a Healthy Streets Approach in the design and management of development as set out in Policy T2 of the London Plan, including a Healthy Streets Assessment as part of the transport assessment; and positive engagement with the Healthy Streets Approach to deliver public realm and other improvements that support walking, cycling and the use of public transport.
 - (iv) where appropriate, support and safeguard land for transport and freight infrastructure enhancements to meet the demands arising from future growth, including improvement to capacity, connectivity, quality, and interchanges across the highway network, in accordance with Policy T3 of the London Plan.

52.D Regulation 18 Consultation Questions



- A. Do you agree with the draft policy on transport proposals?
- B. Do you support the decision to move away from naming specific schemes in the policy and to focus on key strategic areas, such as the London Cancer Hub (policy 7)?
- C. If your answer to B is no, are there any specific significant transport improvement schemes that you feel should be included?

Issue 53 - Transport Impacts

53.A Introduction

- 53.1** Almost all developments have some implications for the local transport network, and large trip-generating developments can have a significant impact. This can vary from additional congestion on major and local roads to making access to bus stops, railway stations and direct walking routes incoherent, unsafe and unattractive.
- 53.2** London Plan Policy T4 (Assessing and mitigating transport impacts) makes it clear that ‘transport assessments or statements should be submitted with development proposals to ensure that impacts on the capacity of the transport network (including impacts on pedestrians and the cycle network), at the local, network-wide and strategic level, are fully assessed. Transport assessments should focus on embedding the Healthy Streets Approach within, and in the vicinity of, new development. Travel Plans, Parking Design and Management Plans, Construction Logistics Plans and Delivery and Servicing Plans will be required having regard to Transport for London guidance.’
- 53.3** Following on from this, TfL released dedicated Sustainable Transport, Walking and Cycling London Plan Guidance (LPG) in 2022, requiring that boroughs identify land requirements that will support enhanced public transport connectivity and capacity as part of the local plan process, and support the strategic targets for sustainable travel set out in the Mayor’s Transport Strategy. The guidance applies to:
- all applications that would involve the erection of new structures, or significant change of use and that would have the potential to impact (positively or negatively) on the provision of space for walking, cycling and public transport (including buses, trams, and rail)
 - all applications that would affect bus garages, bus stations or bus stops, or other land that supports public transport
 - all applications adjacent to or adjoining the rail network.

53.B Context for Sutton

- 53.4** The Adopted Local Plan set out policies to focus development in locations with higher levels of public transport accessibility (PTAL), and in 2021 the Council published a new Sustainable Transport Strategy (STS) with Supplementary Planning Document (SPD) status, with the following key aims:
- To take forward and localise the Mayor’s Transport Strategy objectives;
 - To take forward the Sutton Local Plan’s policies;
 - To take forward the Sutton Environment Strategy’s objectives in relation to transport, and act on the Council’s Climate Emergency declaration;

- To give the Sustainable Transport Strategy more ‘teeth’, by making it more straightforward for transport needs to be accommodated within planning conditions;
- To take account of the new Sutton Local Implementation Plan (LIP 3) which sets out local sustainable transport improvement schemes;
- To bring together the existing strategy for cycling with a new walking strategy, and incorporate old SPDs (Car Clubs and Transport Assessments and Travel Plans) into a “one-stop shop”;
- To account for new transport developments, such as electric vehicles and charging infrastructure, as well as recognition of powered two wheelers;
- To provide detail on the borough’s requirement for how new construction will be managed through Construction Logistics Plans; and
- To identify and manage overlaps with the current Parking Strategy.

Construction and other impacts

53.5 The suite of planning guidelines within the STS cover all transport modes as well as construction works and logistics, placing obligations on developers and the Council to ensure that impacts and mitigation measures are considered and provided for as part of the planning application process. Traffic generation and temporary carriageway restrictions from construction works in Sutton, particularly large developments, can have a significant impact on the local transport network.

53.6 Depending on the likely impact on both transport network users and local residents, developers will be expected either to account for this either in their Transport Assessment (or Transport Statement for smaller developments) or, for larger schemes, in a dedicated Construction Logistics Plan (CLP) that accords with TfL and/or CLOCs guidance⁴². This may mean that an outline CLP will be required to accompany the planning application, with an overview of expected activity, and for a detailed CLP to be provided as a condition of granting approval.

53.7 For areas of concentrated development, such as Sutton Town Centre and Beddington Lane, there is a prospect of numerous developments occurring simultaneously, thus exacerbating the impact of construction traffic. Where this is likely to happen the Council will expect that consideration will be given to appropriate management of higher levels of construction traffic, and CLPs will be expected to account for how this will be managed. In some cases it may be appropriate for linked or joint CLPs to be produced.

53.8 Issue 52 on Sustainable Transport Proposals sets out the key principles for new development proposals in terms of locations, the Healthy Streets approach and safeguarding for future growth. This policy embeds impact mitigation further by drawing together the Mayors various guidance and strategic policies to ensure that all potential impacts arising from site selection, environmental concerns, construction and safety are considered fully.

Sustainable delivery and servicing

53.9 Aside from construction impacts and traffic generation by residents, employees and visitors, one of the biggest impacts of new developments can be felt from deliveries

⁴² https://www.clocs.org.uk/resources/clp_guidance_clocs_final.pdf

and servicing. The larger vehicles used for goods, waste and maintenance activities, with movements throughout the day and associated noise, must be taken into account.

53.10 Policy T4.B and T7 of the London Plan, and s.11 of the Sutton Sustainable Transport Strategy SPD, include Delivery and Servicing Plans as a required document to help reduce levels of road freight, particularly during peak periods and make use of sustainable modes where possible. As part of this, proposals need to consider the effects of activities on the wider road environment, including ensuring pedestrian and cyclist safety is maintained throughout operational periods.

53.11 DSPs consist of a range of tools, actions and interventions aimed at reducing and re-timing deliveries, redefining building operations and ensuring procurement activities account for vehicle movement and emissions. This includes opportunities for freight consolidation to reduce vehicle numbers and support for zero emission vehicles.

Towards a Policy Approach

53.12 Based upon the evidence and analysis, the Council has established a series of policy principles for consideration as part of this Regulation 18 consultation. These are:

53.C Draft Policy 53 on Transport Impacts

Development Proposals and Construction

- (a) Development proposals must ensure impacts on the transport network are mitigated and avoided. This will be achieved by ensuring that:
 - (i) impact to the transport network is reduced by promoting active and sustainable travel.
 - (ii) new developments do not limit future options for future strategic or sustainable transport schemes.
 - (iii) environmental impacts are reduced, including reducing congestion, emissions, improving air quality and public health.
 - (iv) Development proposals that will have a significant impact on traffic congestion on the highway network, and/or the capacity and function of the transport network, will be required to contribute to and deliver appropriate supporting transport infrastructure and/or effective mitigation measures, including off-site where needed, through Section 106 and/or Section 278 agreements.
- (b) Major development proposals and any development that is likely to have a significant impact on the transport network will be required as part of the planning application to submit a Transport Assessment or Transport Statement, and/or Travel Plan, in accordance with London Plan Policy T4 and the planning guidelines contained within Appendix C of the Sutton Sustainable Transport Strategy SPD. Transport Assessments and/or Transport Statements should focus on embedding the Healthy Streets Approach within and around new developments.
- (c) Development proposals that are likely to impact on the local transport network during construction, and which are expected to result in local closures/restrictions and/or significant numbers of vehicle trips for goods or materials during construction, will also be required to submit a Construction Logistics Plan. This should demonstrate how impact on

the transport network and the amenity of local residents and functioning of existing businesses will be avoided, remedied or mitigated.

- (d) Development proposals will be required to demonstrate that proposals will not result in any detrimental impact on road safety.
- (e) Development proposals will be required to support the delivery of, and safeguard land required for, future strategic transport schemes, as well as protect and enhance existing transport infrastructure. Proposals that would prevent the delivery of future strategic transport schemes will not be supported.
- (f) The Council will not grant planning permission unless the full potential impact of any development is considered as above, together with any transport improvements considered necessary by the Council to overcome any adverse impacts of the development.

Sustainable Delivery, Servicing, and Consolidation

- (g) New development proposals should encourage safe, low emission and efficient delivery and servicing, particularly through 'last-mile distribution'. Delivery and servicing requirements should be considered at the early stages of the design-led approach and be integrated within the site boundary.
- (h) New development proposals should use zero emissions vehicles for servicing wherever possible, including for consolidated deliveries. Servicing by cycle and other non-motor vehicular modes will be supported by the Council. Any loading bay required for a development should be supplied with an electric vehicle charge point to allow zero emissions vehicles to operate from the bay.
- (i) Development proposals that generate a significant number of vehicle trips for goods or materials during operation will be required to submit a Delivery and Servicing Plan as part of the transport assessment. This should demonstrate how sustainable freight movements are to be facilitated in accordance with London Plan Policy T7, and should also show how:
 - (i) delivery of goods and servicing will be provided within the site to encourage shared arrangements and timing of deliveries.
 - (ii) movement by rail and the use of low emission vehicles, electric vehicles, bicycles and freight consolidation facilities have been prioritised.
 - (iii) where possible, development will use existing consolidation and distribution facilities to minimise the number of trips required to service the site, and smart or joint procurement measures will be considered to reduce the numbers of deliveries and servicing trips as should the use of micro-consolidation centres.

53.D Regulation 18 Consultation Questions



- A. Do you agree with the draft policy on transport impacts?
- B. If you do not support the provisions of the draft policy, please give reasons and where possible suggest alternatives.

Issue 54 - Parking

54.A Introduction

- 54.1** Until 2016, parking policy in London adopted a flexible approach, seeking to ensure a level of accessibility by private car consistent with the overall balance of the transport system at the local level. The 2011 London Plan accepted that any development or land use needed to provide sufficient off-street parking to avoid causing overspill parking on-street, while not encouraging unnecessary car use.
- 54.2** The Mayor’s Transport Strategy (2018) and London Plan (2021) have taken this approach a step further, with a focus on encouraging greater use of sustainable travel modes and a presumption towards car-free development in town centres and areas of higher public transport accessibility, with reduced levels of parking elsewhere.
- 54.3** At the same time, the London Plan pushes for development proposals that help remove barriers to cycling and create a healthy environment in which people choose to cycle. This is to be achieved through supporting the delivery of a London-wide network of cycle routes, with new routes and improved infrastructure, and the provision of appropriate levels of cycle parking.
- 54.4** London Plan Policy T6 sets out policy and maximum parking standards for residential, office, retail and leisure parking in London that borough Local Plans must adhere to, along with parking for people with disabilities and EV charger-equipped parking bays. Policy T5 covers cycle parking standards. It also introduces a requirement for Parking Design and Management Plans to be submitted alongside all new development applications.

54.B Context for Sutton

Car Parking

- 54.5** Vehicles take up a lot of street space, and high levels of car ownership and use have resulted in many of the borough’s roads, particularly in more dense residential areas, becoming congested and dominated by parked cars.
- 54.6** Sutton has the 4th lowest number in London of households with no access to a car or van⁴³ (22.8%), and 6th highest average in London in terms of number of cars per household (1.15). According to the RAC Foundation’s “Standing Still” report in 2021, an estimated 49% of households in Sutton (over 32,000) have no off-street parking or parking potential, leading to both parking stress and reduced opportunities for home charging of electric vehicles. While a small number of these are in newer developments designated as being car-free, the majority are in denser suburban and residential roads including terraced housing. Reducing levels of car ownership can free up space on both development sites and on the highway for other more efficient and sustainable uses, particularly walking and cycling.

⁴³ <https://www.ons.gov.uk/datasets/TS045/editions/2021/versions/4>

- 54.7** The Adopted Local Plan (2018) Appendix sets out clear restraint based, maximum parking standards for new developments taking into account public transport accessibility levels, existing publicly available parking provision and usage in the vicinity of the site, and the need to deter unnecessary car use while avoiding overspill parking problems. The standards are determined by planning use class as originally set out in the Town and Country Planning (Use Classes) Order 1987. A number of use classes were subsequently amended by the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020.
- 54.8** The new London Plan policies T6 and T6.1 to T6.5 make limited reference to use classes, and the final published version does not take the changes published in 2020 into account, although the GLA have published an addendum at https://www.london.gov.uk/sites/default/files/plp_2020_statement_on_use_class_order.pdf . The new Local Plan policy and associated appendices represent an opportunity to clarify the changes to parking provision outlined in the London Plan, while reflecting the updated use classes above. Where the London Plan does not explicitly refer to a particular type of development, the appendix will be used to clarify as far as possible.
- 54.9** While the London Plan also permits adjustments to local parking standards for Opportunity Areas, the boundary and policy status of the Sutton Opportunity Area is currently unresolved, as noted in Issue 2 (Spatial Strategy). As such, there are no proposed local amendments until such time as this is finalised.

Cycle Parking

- 54.10** The Local Plan 2018 adopted the cycle parking standards used by TfL and recommended in the previous London Plan for inclusion in borough Local Plans, with minor amendments where appropriate to reflect local circumstances. All the standards are minima with an expectation on developers to exceed them, particularly where car parking provision is very limited. Lower provision on-site than the standard would only be permitted in exceptional circumstances where considered inappropriate or impractical to provide the full standard, subject to a commuted sum being paid towards the provision of public cycle parking or other facilities to assist and encourage cycling.
- 54.11** The new Local Plan will adopt the revised cycle parking standards set out in Policy T5 of the London Plan 2021, as amended by changes to the planning use classes noted above and future changes such as approved micromobility schemes (e-bikes, e-scooters, etc.).

Calculation of Standards and Parking Space Dimensions and Layouts

- 54.12** Appendix 11 of the Local Plan 2018 included diagrams showing the minimum sizes for parking spaces, bays and garage internal dimensions. The standard parking bay size of 2.4m x 4.8m is taken from Building Regulations Part M (Access to and use of buildings, Vol 1 Dwellings), but revised guidance from the Institute of Structural Engineers in June 2023 has recommended that the length of a parking bay be increased to 5m and the width 2.6m, to account for increases in vehicle sizes and weights since the original standards were introduced in the 1970s.

54.13 Remarketing of some existing car parks as part of redevelopment to reflect this change would result in some capacity reduction, but would be dependent on aisle widths and the location of supporting structures and columns within multi storey car parks to be feasible. While this might also be in part somewhat counter-intuitive to the Council's overall aims to reduce traffic within the town centre, and would potentially enable access for some larger heavier vehicles, it remains an option for the future. In the meantime the Council will revise the minimum Local Plan standard for new/reprovisioned parking as set out in Appendix 11.

Garage Dimensions

54.14 The RAC Foundation "Standing Still" report also highlighted issues with modern car dimensions and garage size. It is clear that many garages within Sutton, as with elsewhere, are not used for parking of vehicles but instead are used for storage or utilities purposes, or have been converted to provide additional liveable or homeworking space. As noted above, changing vehicle safety standards and ownership trends mean that older garages are often too small to accommodate most modern family cars, contributing to on-street parking stress. Garages in new developments are comparatively rare, however where proposed they are therefore required to provide enough space for all functions they are planned to accommodate.

54.15 As such, Appendix 11 sets out the minimum internal dimensions, including where a garage is also to be used to meet the London Plan standard for cycle or motorcycle parking.

Towards a Policy Approach

54.16 Based upon the evidence and analysis, the Council considers that it can move directly towards a draft policy approach for consideration as part of this Regulation 18 consultation. The draft policy is as follows:

54.C Draft Policy 54 on Parking Standards

Vehicle Parking

- (a) New developments for residential, office, retail, hotel and leisure uses will be expected to provide car and/or motorcycle parking in accordance with policies T6 and T6.1 to T6.5 of the London Plan (or any successor document). For use classes which are not covered explicitly within these policies, the Council's restraint-based car parking standards (as set out in Appendix 11) will apply along with standards for disabled persons in Policy T6.5.
- (b) In Sutton Town Centre or other accessible locations where car-free or car-light development is required, and in CPZs or PPAs, regardless of any existing or proposed off-street parking, applications for developments will also be required to:
 - (i) enter into a legal agreement prohibiting residents (and their visitors) from obtaining on-street or off-street parking permits.
 - (ii) to submit a Transport Assessment or Transport Statement (as appropriate) to assess potential impact of the development on capacity within the existing

- public transport infrastructure, and work with key stakeholders such as Network Rail and Transport for London to ensure that any impact is mitigated.
- (iii) Where justified, a contribution towards offsetting increased public transport needs will be secured by a legal agreement (s.106/s.278) as appropriate.
- (c) All new or re-provided parking spaces (in residential and non-residential development) should be equipped with electric vehicle charging facilities in accordance with Policy T6 of the London Plan, the Council’s EV Charging Strategy (where applicable) and Building Regulations Part S.
 - (d) Minimum dimensions of car spaces and garages will be determined by latest industry standards and Building Regulations Part M, Appendix A, in, but should be at least as set out in Appendix 11.

Cycle Parking

- (e) All new cycle parking must be of high quality in line with Policy T5 of the London Plan and the London Cycling Design Standards. Developments will be required to ensure:
 - (i) cycle parking is well-located, safe, secure, and accessible, and provide a balance of short-stay and long-stay provision;
 - (ii) cycle parking and storage caters to all types of cycles, including (but not limited to) bicycles, tricycles, adapted cycles, e-bikes, and cargo bikes. Additional provision should be made for other sustainability options, such as buggies, mobility scooters and other approved micromobility schemes;
 - (iii) complementary facilities to support cycle use are provided where appropriate, including accessible showering and changing facilities, storage lockers, and basic maintenance equipment such as bike pumps; and
 - (iv) where suitable, and subject to schemes being implemented in the borough, publicly accessible shared cycle hire scheme parking or docking stations are provided as part of the development (or through a financial contribution).

Parking bay, Parking Space and Garage Internal Dimensions

- (f) Parking bays, parking spaces and garages shall be subject to the minimum dimensions set out in Appendix 11.

54.D Regulation 18 Consultation Questions



- A. Do you agree with the draft policy on parking?
- B. Are there any alternative approaches that could be suggested?
- C. If you do not support the provisions of the draft policy, please give reasons and where possible suggest alternatives.

Issue 55 - Infrastructure

55.A Introduction

- 55.1** National policy sets out the importance of aligning infrastructure delivery with planned growth to achieve sustainable development. It highlights the role the Local Plan has in setting out the contributions expected from development in order to fund affordable housing and other infrastructure such as health, education, transport, flood and water management, green and digital infrastructure. The London Plan (2021) states that ‘development proposals should provide the infrastructure and meet the other relevant policy requirements to ensure they are sustainable’ at Policy DF1.
- 55.2** The two main mechanisms for this are the Community Infrastructure Levy (CIL) and Planning Obligations.

55.B Context for Sutton

Community Infrastructure Levy (CIL)

- 55.3** CIL is a charge levied on the net increase in floorspace arising from development in a Council's area. It is used to fund infrastructure that is required to support development. The Council collects two types of CIL - Mayoral CIL and Sutton CIL.
- 55.4** The Sutton CIL charge was introduced in 2014 and is charged against residential and convenience retail development. The rates were reviewed in 2018 following the adoption of the Local Plan, and remain at £100 per sq.m. for residential and £125 sq.m. for convenience retail.
- 55.5** Whilst most CIL is used to fund strategic infrastructure across the borough, a proportion is spent on local priorities in consultation with the community administered through the Neighbourhood Fund scheme.
- 55.6** The Mayor of London introduced a Mayoral CIL charge (MCIL1) in 2012 to finance the Elizabeth Line (Crossrail). This was superseded by a new Mayoral CIL charge (MCIL2) in 2019. In Sutton this charge (MCIL2) is £25 per m². It is levied on all land uses except health and education and is collected by the London Borough of Sutton and transferred to the Mayor.

Planning Obligations

- 55.7** Planning obligations are legal obligations which act to mitigate the impacts of a development proposal. They can be entered into either by a Section 106 agreement between a landowner/person with an interest in the land and local planning authority relating to a planning permission, or by a unilateral undertaking by the developer/person with an interest in the land. They are normally used when planning conditions cannot adequately control the development, and can secure the provision of necessary infrastructure.

55.8 As set out in the NPPF and CIL Regulations, planning obligations may only be used in granting planning permission where they are:

- necessary to make the development acceptable in planning terms.
- directly related to the development.
- fairly and reasonably related in scale and kind to the development.

55.9 The Council uses planning obligations to secure developer contributions for affordable housing and other infrastructure to mitigate the impacts of a development proposal. Further information about the requirements for planning obligations are included in other policies in the Local Plan, in the Council's Planning Obligations Supplementary Planning Document (SPD) (2014) and Affordable Housing and Financial Viability SPD (2020). The obligations identified in the Local Plan and SPD are not an exhaustive list, and planning obligations may be needed to address a number of issues that arise in relation to the mitigation of a particular development.

Viability

55.10 In considering planning obligations, the Council takes into account economic viability, the full range of benefits provided by a development, the extent to which it contributes towards delivering Local Plan objectives, other planning policies and whether a development is publicly funded. Financial viability has become a key issue in the planning process. Where, during the negotiation of a development proposal, it is argued that the Council's requests for contributions would render development unviable, the Council will expect developers to provide information on viability through an 'open-book' approach.

55.11 A London borough Development Viability Protocol has been agreed to provide a benchmark to the development industry about the overall principles of viability in the planning process. The Council is a member of the forum and has signed up to the protocol, which is currently under review.

Infrastructure Planning

55.12 The Council is considering the options for meeting the growth needs of Sutton, not only for housing, but also for office and other employment land needs (Issue 1 on Establishing Sutton's Growth Needs and Issue 2 Sutton's Spatial Strategy). It is essential that, to complement the growth, a range of infrastructure is provided particularly in areas experiencing the majority of growth.

55.13 The Council will update the Infrastructure Delivery Plan and 'Infrastructure Schedule' following consultation on the Issues and Preferred Options document to set out details on the key infrastructure schemes that are likely to be required to complement the preferred growth option over the Local Plan period in consultation with infrastructure providers.

Towards a Policy Approach for Sutton

55.14 The Government is proposing to replace the current system of developer contributions and introduce an 'Infrastructure Levy'. This new Levy would be charged on the value at completion, and rates and thresholds set locally. Use of Section 106 agreements would be retained for use in limited circumstances only.

There will be further consultation on the design of the Levy, before regulations are made. The Council will take account of subsequent changes to the system of developer contributions where necessary.

55.15 Based upon the evidence and analysis, the Council considers that it can move directly towards a draft policy approach for consideration as part of this Regulation 18 consultation. The draft policy is as follows:

55.C Draft Policy 55 on Infrastructure Delivery

- (a) The Council will seek planning contributions to ensure the necessary infrastructure to support the Local Plan is delivered, by:
 - (i) charging CIL on developments in accordance with the CIL Regulations (2010, as amended).
 - (ii) seeking planning obligations to secure provision of affordable housing and to ensure that all new development meets on and off site requirements to mitigate the impacts of development where necessary and appropriate, having regard to any relevant policies or supplementary planning documents
 - (iii) requiring viability assessments to be submitted as part of a planning application to ensure that appropriate and acceptable levels of contributions are secured, where proposals do not meet planning policy requirements or do not propose to deliver required planning obligations.
- (b) The Council will work with relevant providers to ensure that the necessary infrastructure is secured to support growth in the borough over the Plan period (2024-2041).

Infrastructure Assessments

- (c) The Council will require development proposals to be accompanied by a site specific infrastructure assessment for major developments. These assessments will determine the additional infrastructure that will need to be created to support that proposal, beyond the infrastructure in the Local Plan, and sets out how these requirements will be delivered.

55.D Regulation 18 Consultation Questions



- A. Do you agree with the draft policy on Infrastructure Delivery ?
- B. Do you agree with the requirement for site specific Infrastructure Assessment? What should the development threshold be?
- C. Please give reasons and where possible suggest alternatives.

Issue 56 - Monitoring

56.A Introduction

- 56.1** Local Plans need to be reviewed regularly to assess how well policies and proposals are being implemented and to ensure that they are up-to-date. Monitoring, together with the consideration of wider changes, provides the objective basis necessary for such reviews.
- 56.2** In accordance with national planning policy and relevant Regulations, the Council will review policies within this Plan to assess whether or not they need updating at least every five years. The first review will be completed no later than five years from the adoption date of the Local Plan.
- 56.3** The Council produces a Local Plan Authority Monitoring Report on an annual basis to measure the Local Plan implementation, for which the indicators set out in the adopted Local Plan will be used as the basis for assessment.

56.B Context for Sutton

- 56.4** The Council recognises that ongoing plan monitoring and review are essential to
- Delivering the objectives of the plan.
 - Assessing the implementation of strategic policies.
 - Analysing the effectiveness of all policies.
- 56.5** In order to ensure plan monitoring is carried out comprehensively, the Council will create a Monitoring Framework which will measure the progress being made in meeting the strategic objectives. The Framework also includes a range of indicator and targets for the purposes of monitoring and reviewing the plan:
- Contextual indicators that show the baseline position of the socio-economic considerations.
 - Local indicators which reflect the policies of the plan.
 - Relevant targets which derive from the London Plan.
- 56.6** The reporting of the indicators and targets in the Monitoring Framework will take place through the Council's Monitoring Reports which the Council produces on a regular basis.

Towards a Policy Approach

- 56.7** Based upon the evidence and analysis, the Council considers that it can move directly towards a draft policy approach for consideration as part of this Regulation 18 consultation. The draft policy is as follows::

56.C Draft Policy 56 on Monitoring

- (a) The Council will monitor and review the effectiveness of the Local Plan's policies in achieving the strategic objectives of the policies and related objectives and targets set out at local and regional level every five years. Conclusions from the first review will be published no later than five years from the adoption date of the Local Plan through the Council's Authority Monitoring Report.
- (b) The Council will have particular regard to the following factors when reviewing policies within the Local Plan and determining whether or not relevant policies require updating:
 - (i) The Monitoring Framework;
 - (ii) The latest Authority Monitoring Report, including reported progress against the requirements for the planned delivery of development and infrastructure;
 - (iii) Conformity of policies with national planning policy;
 - (iv) Changes to local circumstances (including a change in local housing need);
 - (v) Significant local, regional or national economic changes; and
 - (vi) Progress in plan-making activities by other local authorities and the Mayor of London.

56.D Regulation 18 Consultation Questions



- A. Do you agree with the draft policy on Monitoring?
- B. Please give reasons and where possible suggest alternatives.

Issue 57 - Site Allocations

57.A Introduction

57.1 Site allocations are planning policies which apply to key potential development sites across Sutton. They set out site-specific requirements for new homes, jobs, transport and social infrastructure, public access routes, public open space, heritage and conservation, and other land uses. Once adopted, the site allocations are a key vehicle to achieve the delivery of the Strategic Objectives and Strategic Policies of the Local Plan. The full list of potential site allocations and possible future uses are set out in [Chapter 4](#) of this document.

57.B Context for Sutton

57.2 Site allocations do not preclude development coming forward elsewhere in the borough and the suitability of development on other sites will be judged against the policies of the Local Plan.

57.3 The allocations state the particular land uses the Council expects to be developed on a particular site. However, in the case of social and community infrastructure and free-standing offices, it is difficult to allocate particular sites for such uses as these are usually stand-alone uses and may occur in any number of sites. Adopted Local Plan (2018) Policy 40 allows for applications for social and community infrastructure and free-standing offices to override the plan's allocation where these uses are proposed and where exceptional circumstances exist. The Council will consider taking forward this policy again, particularly in light of the challenges around offices, where the identified need is not aligned with market demand. Should market conditions change, a policy of this nature would give flexibility to help meet need.

Towards a Policy Approach

57.4 Based upon the evidence and analysis, the Council considers that it can move directly towards a draft policy approach for consideration as part of this Regulation 18 consultation. The draft policy is as follows:

57.C Draft Policy 57 on Site Allocations

- (a) The Council will grant planning permission for development in accordance with the land uses which, at the draft Plan stage, will be set out in the upper box on the second page of the site allocation, subject to the proposed development meeting the other policies in the Local Plan.
- (b) In exceptional circumstances, if a proposal for social and community infrastructure or a free standing office building is submitted for a site which is not allocated for such uses, the Council may permit development for social and community infrastructure or a free standing office building contrary to the allocation.

57.D Regulation 18 Consultation Questions



- A. Do you agree with the draft policy on Site Allocations?
- B. Do you agree that the Council should carry forward its current policy that would allow social and community infrastructure and offices to override site allocations in exceptional cases?
- C. If you do not support the provisions of the draft policy, please give reasons and where possible suggest alternatives.

Chapter 4 - Potential Site Allocations

58.A Introduction

- 58.1** This part of the document deals with the range of possible sites that could help accommodate development within Sutton over the next 10 to 15 years.
- 58.2** The NPPF requires local plans to allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate. The national Planning Practice Guidance (PPG) makes clear that the identification of potential sites should be based upon a robust and credible assessment of suitable, available and achievable land.
- 58.3** The guidance also makes clear that developers, land-owners and the local community should be involved at the earliest possible stages of Plan preparation. As such the Council undertook a 'Call for Sites' consultation where a wide range of stakeholders were invited to submit sites to the Council for consideration. This engagement is seen as a continuous process in preparing the Local Plan.
- 58.4** Accordingly the Council has sought to identify a wide range of possible sites for developing within the Plan period, in line with national guidance. This has been done through the Strategic Housing and Economic Land Availability Assessment, which forms part of the evidence base. The sites have been derived from a wide range of sources, such as, existing allocations, sites with planning permission, sites submitted through the 'Call for Sites' process, and other sites which the Council considers may come forward for development within the next 10 to 15 years.

58.B How to Read the Potential Site Allocations

- 58.5** The sites identify basic site information and suggest a number of possible future uses. However, it should be clear that the sites identified in this document do not constitute proposals, but are the first stage in identifying sufficient land to meet the long term needs of the borough and have not yet been fully tested for availability (owner's willingness to develop or redevelop), achievability (financial viability to develop) or suitability (in conformity with other plan policies where applicable). In addition, it should be noted that, for sites suggested by developers, inclusion in this document does not necessarily mean the Council agrees with the suggested use(s) for a site, but has been included for the purposes of consultation.
- 58.6** When the Local Plan is adopted the 'Site Allocations' will broadly prescribe the development that will be permitted on a specific site. Proposals for other types of development will not generally be permitted.

Notes

- Public Transport is assessed according to the 'Public Transport Accessibility Levels' (PTAL). For example, Level 1 refers to those areas of the borough which have poor public transport services. Level 6 denotes an area with excellent public transport connections and services.
- Site area is expressed in hectares (ha).
- Open spaces consist of Green Belt, Metropolitan Open Land, Public Open Space and Urban Green Space. These are taken from the current Local Plan Policies Map.
- Heritage consists of Conservation Areas, Areas of Special Local Character, Listed Building or Locally Listed Building, Scheduled Monument or a Historic Park and Garden.
- Flood Risk refers to fluvial flood risk.
- Some of the sites included are currently under construction, if they are fully completed by the time of the next draft, they will be withdrawn from the document.
- The potential future uses on a site can be one individual potential future use for a site or a combination of potential future uses for a site, depending on the site size and location.

58.C Regulation 18 Consultation Questions



- A. Do you think that any of the possible sites identified in this document should **not** be developed? If so, please give reasons?
- B. Do you think that any of the uses potentially identified for the sites are **not** suitable? If so, please give reasons?
- C. Do you consider that there are any other possible sites which should be developed as part of the Local Plan and for what use? (Please provide details, such as, site plan, area of site, ownership, suggested use, and any other information that you feel is relevant.
- D. Are there any area designations within the appendices of this document which you wish to comment on? Please give the map or schedule reference number and your reasons for support or objection.

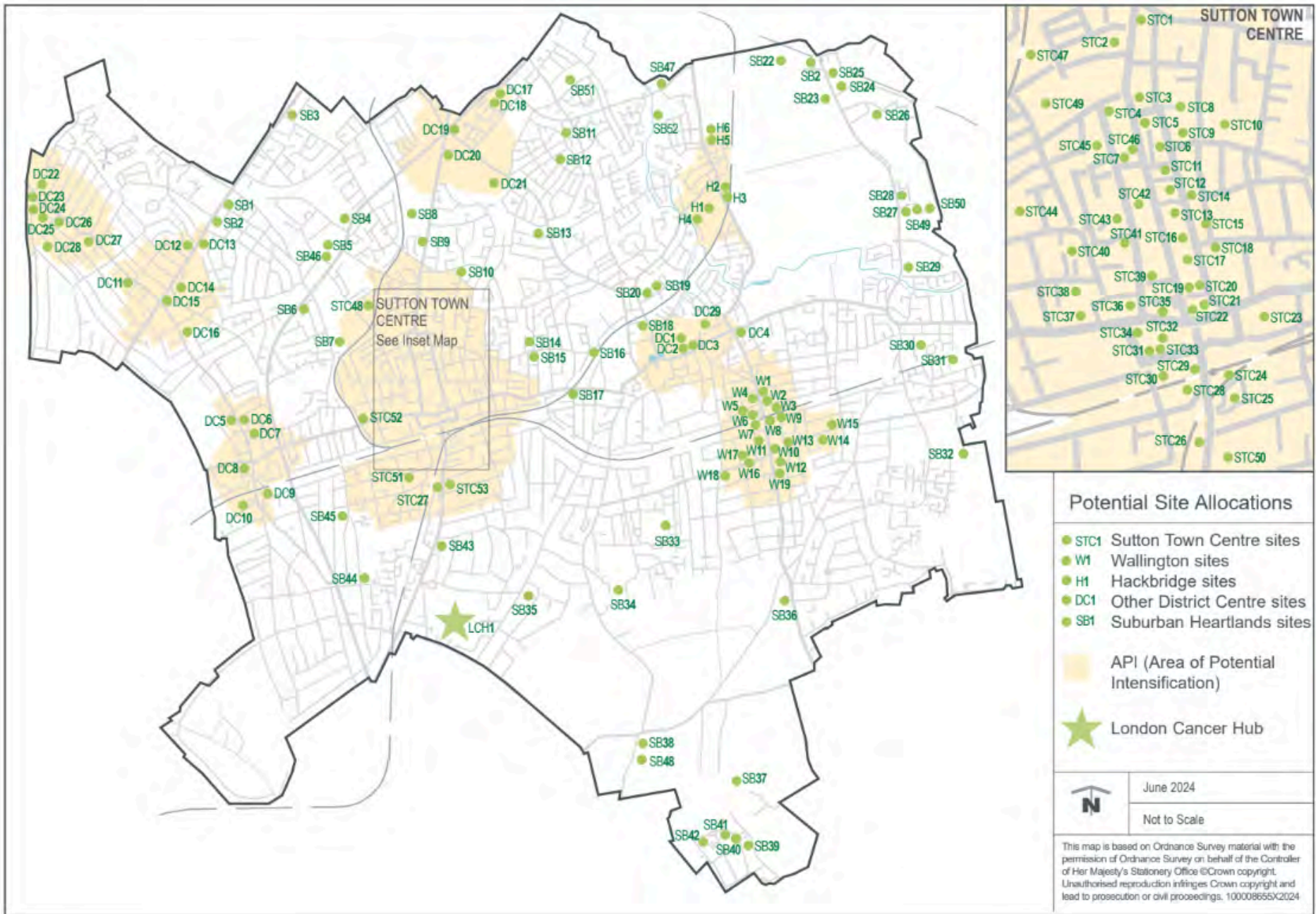




















Table 4.1: Potential Site Allocations






An interactive version on these maps is available online at [Local Plan Potential Site Allocations](#)





REF	SITE NAME	Map	SITE Size	LOCATION	EXISTING LAND USE(S)	POTENTIAL FUTURE USE(S)	Other
LONDON CANCER HUB (LCH)							
LCH1	London Cancer Hub, Downs Road / Brighton Road, Belmont, Sutton.		22.6	Belmont	Medical Research Campus Education (Class F1)	<ul style="list-style-type: none"> • Medical Research • Class E Class E(g), (i), (ii), and (iii) only. • Health • Hospital • Education (Class F1) • Hotel (Class C1) • Ancillary Accommodation • Allotments 	PTAL Level: 1 Ownership: Private / Council / Public Flood Risk: No Open Space: Allotments Heritage: No Permissions: Yes Comments: No
SUTTON TOWN CENTRE AND API (STC)							
STC1 (HELAA 2023 Ref: SH1)	Helena House, 348-352 High Street, Sutton SM1 1QE		0.14	Sutton Town Centre	Vacant - Previously Employment (Class E)	<ul style="list-style-type: none"> • Residential • Class E 	PTAL Level: 5 Ownership: Private Flood Risk: No Open Space: No Heritage: No Permissions: Yes Comments: No
STC2 (HELAA 2023 Ref: SH121)	Former Morrison's Local and Car Park, SM1 1LW		0.15	Sutton Town Centre	Retail (Class E)	<ul style="list-style-type: none"> • Residential • Class E 	PTAL Level: 5 Ownership: Private Flood Risk: No Open Space: No Heritage: No Permissions: No Comments: No






STC3 (HELAA 2023 Ref: SH152)	Lidl Block, High Street, Sutton SM1 1PG		0.56	Sutton Town Centre	Employment (Class E)	<ul style="list-style-type: none"> • Residential • Class E 	PTAL Level: 6a Ownership: Private Flood Risk: No Open Space: No Heritage: No Permissions: No Comments: No
STC4 (HELAA 2023 Ref: SH151)	Halford Block, Throwley Way, Sutton SM1 1SE		0.27	Sutton Town Centre	Residential (Class C3) Class E	<ul style="list-style-type: none"> • Residential • Class E 	PTAL Level: 6a Ownership: Private Flood Risk: No Open Space: No Heritage: No Permissions: No Comments: No
STC5 (HELAA 2023 Ref: SH16)	Northern Gateway, 246-254 High Street and 2 Marshalls Road, Sutton, SM1 1PA		0.31	Sutton Town Centre	Vacant - Previously Retail & Offices (Class E)	<ul style="list-style-type: none"> • Class E • Education (Class F) • Residential 	PTAL Level: 4 Ownership: Council Flood Risk: No Open Space: No Heritage: No Permissions: No Comments: No
STC6 (HELAA 2023 Ref: SH14)	Elm Grove Estate, Sutton, SM1 4EU		2.04	Sutton	Residential (Class C3)	<ul style="list-style-type: none"> • Residential 	PTAL Level: 6a Ownership: Council / Private Flood Risk: No Open Space: No Heritage: No Permissions: Pending Comments: No
STC7 (HELAA 2023 Ref: SH5)	2-4 Greenford Road, Sutton SM1 1JY		0.04	Sutton Town Centre	Mixed Use - Residential / Employment (Class E)	<ul style="list-style-type: none"> • Residential • Class E 	PTAL Level: 6a Ownership: Private Flood Risk: No Open Space: No Heritage: No Permissions: Pending Comments: No





STC8 (HELAA 2023 Ref: SH13)	Rosebery Gardens, Sutton, SM1 4EZ		0.89	Sutton	Residential (Class C3)	<ul style="list-style-type: none"> ● Residential 	PTAL Level: 4 Ownership: Council / Private Flood Risk: No Open Space: No Heritage: No Permissions: No Comments: No
STC9 (HELAA 2023 Ref: SH35)	Salvation Army Church, 45 Benhill Avenue, Sutton, SM1 4DD		0.12	Sutton	Church (Class F1)	<ul style="list-style-type: none"> ● Residential ● Class E ● Class F1 	PTAL Level: 4 Ownership: Private Flood Risk: No Open Space: No Heritage: No Permissions: No Comments: No
STC10 (HELAA 2023 Ref: SH12)	Benhill Estate, Sutton, SM1 4DG		0.39	Sutton	Residential (Class C3)	<ul style="list-style-type: none"> ● Residential ● Health (Class E) 	PTAL Level: 1b / 4 Ownership: Council / Private Flood Risk: No Open Space: No Heritage: No Permissions: No Comments: No
STC11 (HELAA 2023 Ref: SH149)	Herald House, 17 Throwley Way, Sutton SM1 4DA		0.05	Sutton Town Centre	Residential (Class C3) Employment (Class E)	<ul style="list-style-type: none"> ● Residential ● Class E 	PTAL Level: 6a Ownership: Private Flood Risk: No Open Space: No Heritage: No Permissions: No Comments: No
STC12 (HELAA 2023 Ref: SH49)	Old Court House Surgery, Court House, Throwley Way, Sutton, SM1 4AF		0.15	Sutton Town Centre	Employment (Class E)	<ul style="list-style-type: none"> ● Residential ● Class E ● Health 	PTAL Level: 6a Ownership: Priv Flood Risk: No Open Space: No Heritage: No Permissions: No Comments: No





STC13 (HELAA 2023 Ref: SH116)	2-4 Lodge Place, Sutton, SM1 4AU		0.40	Sutton Town Centre	Employment (Class E) and Car Parking (Sui Generis)	<ul style="list-style-type: none"> ● Residential ● Class E 	PTAL Level: 6a Ownership: Private Flood Risk: No Open Space: No Heritage: Yes Permissions: Yes Comments: No
STC14 (HELAA 2023 Ref: SH146)	Kwikfit Site, Throwley Way, Sutton SM1 4AF		0.09	Sutton Town Centre	Employment (Class B2)	<ul style="list-style-type: none"> ● Residential 	PTAL Level: 6a Ownership: Council Flood Risk: No Open Space: No Heritage: No Permissions: No Comments: No
STC15 (HELAA 2023 Ref: SH159)	Times Square Car Park, Throwley Way SM1 4AU		0.74	Sutton Town Centre	Car Parking (Sui Generis)	<ul style="list-style-type: none"> ● Residential ● Car Park (Sui Generis) 	PTAL Level: 6a Ownership: Council Flood Risk: No Open Space: No Heritage: No Permissions: No Comments: No
STC16 (HELAA 2023 Ref: SH158)	Times House, Throwley Way SM1 4AF		0.20	Sutton Town Centre	Employment (Class E)	<ul style="list-style-type: none"> ● Residential ● Class E 	PTAL Level: 6a Ownership: Private Flood Risk: No Open Space: No Heritage: No Permissions: No Comments: No
STC17 (HELAA 2023 Ref: SH18)	Land to rear of Times Square, Throwley Way, Sutton, SM1 1LF		0.40	Sutton Town Centre	Vacant	<ul style="list-style-type: none"> ● Residential ● Indoor Play Space (Class D1) ● Class E 	PTAL Level: 6a Ownership: Private Flood Risk: No Open Space: No Heritage: No Permissions: Yes Comments: No





STC18 (HELAA 2023 Ref: SH157)	Houses adjacent to Manor Park, Throwley Way SM1 4AE/4AF		0.52	Sutton Town Centre	Residential (Class C3)	<ul style="list-style-type: none"> ● Residential ● Class E 	PTAL Level: 6a Ownership: Council Flood Risk: No Open Space: No Heritage: No Permissions: No Comments: No
STC19 (HELAA 2023 Ref: SH156)	Former Wilko Site, High Street, Sutton SM1 1EZ		0.11	Sutton Town Centre	Employment (Class E)	<ul style="list-style-type: none"> ● Residential ● Class E 	PTAL Level: 6a Ownership: Council Flood Risk: No Open Space: No Heritage: Conservation Area Permissions: No Comments: No
STC20 (HELAA 2023 Ref: SH78)	Throwley Yard, Surrey House, Throwley Road, Sutton, SM1 1AD		0.13	Sutton Town Centre	Employment (Class E)	<ul style="list-style-type: none"> ● Class E ● Other (Sui Generis) 	PTAL Level: 6a Ownership: Council Flood Risk: No Open Space: No Heritage: Yes Permissions: Yes Comments: No
STC21 (HELAA 2023 Ref: SH70)	Sutton Park House, 15 Carshalton Road, Sutton, SM1 4LD		0.26	Sutton Town Centre	Employment (Class E)	<ul style="list-style-type: none"> ● Residential ● Class E 	PTAL Level: 6a Ownership: Private Flood Risk: No Open Space: No Heritage: Yes Permissions: Yes Comments: No
STC22 (HELAA 2023 Ref: SH104)	3-9 Carshalton Road, Sutton, SM1 4LE		0.03	Sutton Town Centre	Mixed Use - Residential (Class C3) / Hot Food Takeaway (Class E/SG)	<ul style="list-style-type: none"> ● Residential ● Class E 	PTAL Level: 6a Ownership: Private Flood Risk: No Open Space: No Heritage: Yes Permissions: Yes Comments: No






STC23 (HELAA 2023 Ref: SH114)	B&Q Site, Sutton Court Road, Sutton, SM1 4RQ		2.26	Sutton Town Centre	Employment (Class E)	<ul style="list-style-type: none"> ● Residential ● Class E ● Health 	PTAL Level: 6a Ownership: Private Flood Risk: No Open Space: No Heritage: Yes Permissions: Yes Comments: No
STC24 (HELAA 2023 Ref: SH10)	Sutton Station and Car Park, Brighton Road, Sutton, SM2 5BW		1.24	Sutton Town Centre	Car Parking (Sui Generis)	<ul style="list-style-type: none"> ● Residential ● Class E ● Public Car Parking 	PTAL Level: 4 / 6a Ownership: Private Flood Risk: No Open Space: No Heritage: No Permissions: No Comments: No
STC25 (HELAA 2023 Ref: SH7)	Quadrant House, Brighton Road, Sutton, SM2 5AS		0.61	Sutton Town Centre	Employment (Class E)	<ul style="list-style-type: none"> ● Residential ● Class E 	PTAL Level: 6a Ownership: Private Flood Risk: No Open Space: No Heritage: No Permissions: No Comments: No
STC26 (HELAA 2023 Ref: SH148)	Petrol Station North of SubSea7, Brighton Road, Sutton SM2 5BN		0.32	Sutton Town Centre	Petrol Station (Class SG)	<ul style="list-style-type: none"> ● Residential ● Class E 	PTAL Level: 6a Ownership: Private Flood Risk: No Open Space: No Heritage: No Permissions: No Comments: No






STC27 (HELAA 2023 Ref: SH28)	2-4 Copse Hill and 52-54 Brighton Road, Sutton, SM2 6AD		0.23	Sutton	Residential (Class C3)	<ul style="list-style-type: none"> • Residential • Class E 	PTAL Level: 5 Ownership: Private Flood Risk: No Open Space: No Heritage: No Permissions: Yes Comments: No
STC28 (HELAA 2023 Ref: SH147)	Shops Opposite Sutton Station, High Street, Sutton SM2 6LE		0.18	Sutton Town Centre	Employment (Class E)	<ul style="list-style-type: none"> • Residential • Class E 	PTAL Level: 6a Ownership: Private Flood Risk: No Open Space: No Heritage: Adj Conservation Area Permissions: No Comments: No
STC29 (HELAA 2023 Ref: SH24)	1-3 High Street, Sutton, SM1 1DF		0.07	Sutton Town Centre	Vacant - Previously Retail (Class E) & Residential (Class C3)	<ul style="list-style-type: none"> • Residential • Class E 	PTAL Level: 6a Ownership: Private Flood Risk: No Open Space: No Heritage: Yes Permissions: Yes Comments: No
STC30 (HELAA 2023 Ref: SH20)	Cophall House, Grove Road, Sutton, SM1 1DA		0.07	Sutton Town Centre	Employment (Class E)	<ul style="list-style-type: none"> • Residential • Class E 	PTAL Level: 6a Ownership: Private Flood Risk: No Open Space: No Heritage: No Permissions: Yes Comments: No
STC31 (HELAA 2023 Ref: SH61)	Land North of Grove Road (44 - 74 Grove Road), Sutton, SM1 1BT		0.18	Sutton	Mixed Use - Vacant / Employment (Class E)	<ul style="list-style-type: none"> • Residential • Class E 	PTAL Level: 6a Ownership: Private Flood Risk: No Open Space: No Heritage: Yes Permissions: No Comments: No





STC32 (HELAA 2023 Ref: SH154)	Land North of Grove Road, Sutton SM1 1DD		1.05	Sutton Town Centre	Residential (Class C3) Class E	<ul style="list-style-type: none"> ● Residential ● Class E 	PTAL Level: 6a Ownership: Private Flood Risk: No Open Space: No Heritage: Yes Permissions: No Comments: No
STC33 (HELAA 2023 Ref: SH136)	36 - 50 Grove Road, Sutton, SM1 1BS		0.09	Sutton	Employment (Class E)	<ul style="list-style-type: none"> ● Residential ● Class E 	PTAL Level: 6a Ownership: Private Flood Risk: No Open Space: No Heritage: No Permissions: No Comments: Previously Refused
STC34 (HELAA 2023 Ref: SH6)	City House, Sutton Park Road, Sutton, SM1 2AE		0.18	Sutton Town Centre	Employment (Class E)	<ul style="list-style-type: none"> ● Residential ● Class E 	PTAL Level: 6a Ownership: Private Flood Risk: No Open Space: No Heritage: Adj Listed Building Permissions: Yes Comments: No
STC35 (HELAA 2023 Ref: SH21)	10-12 Cheam Road, Sutton, SM1 1SR		1.24	Sutton Town Centre	Employment (Class E)	<ul style="list-style-type: none"> ● Residential ● Class E 	PTAL Level: 2 Ownership: Private Flood Risk: No Open Space: No Heritage: Yes Permissions: Yes Comments: No

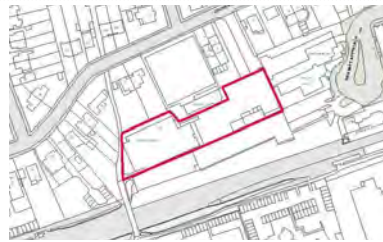



STC36 (HELAA 2023 Ref: SH51)	Civic Offices, St Nicholas Way, Sutton, SM1 1EA		0.90	Sutton Town Centre	Employment (Class E)	<ul style="list-style-type: none"> ● Residential ● Class E ● Health 	PTAL Level: 6a Ownership: Council Flood Risk: No Open Space: No Heritage: Adj Listed Building Permissions: No Comments: No
STC37 (HELAA 2023 Ref: SH53)	Former Secombe Theatre, 42 Cheam Rd, Sutton, SM1 2SS		0.40	Sutton Town Centre	Vacant - Previously Employment (Class E)	<ul style="list-style-type: none"> ● Residential ● Class E ● Health 	PTAL Level: 6a Ownership: Council Flood Risk: No Open Space: No Heritage: No Permissions: No Comments: No
STC38 (HELAA 2023 Ref: SH52)	Gibson Road Multi-Storey Car Park, Sutton, SM1 2RF		0.67	Sutton Town Centre	Employment (Class E)	<ul style="list-style-type: none"> ● Residential 	PTAL Level: 6a Ownership: Council Flood Risk: No Open Space: No Heritage: No Permissions: No Comments: No
STC39 (HELAA 2023 Ref: SH17)	St Nicholas House, St Nicholas Way, Sutton, SM1 1EH		0.08	Sutton Town Centre	Vacant - Previously Retail & Offices (Class E)	<ul style="list-style-type: none"> ● Residential ● Class E 	PTAL Level: 6a Ownership: Private Flood Risk: No Open Space: No Heritage: No Permissions: No Comments: No





STC40 (HELAA 2023 Ref: SH54)	Robin Hood Lane Health Centre, Robin Hood Lane, Sutton, SM1 2RJ		0.25	Sutton	Health (Class E)	<ul style="list-style-type: none"> • Health 	PTAL Level: 6a Ownership: Public Flood Risk: No Open Space: No Heritage: No Permissions: No Comments: No
STC41 (HELAA 2023 Ref: SH96)	8-25 Beech Tree Place and 29-35 West Street, Sutton SM1 1SF/1SJ		0.42	Sutton Town Centre	Residential (Class C3)	<ul style="list-style-type: none"> • Residential 	PTAL Level: 5 Ownership: Council Flood Risk: No Open Space: No Heritage: Yes Permissions: Yes Comments: No
STC42 (HELAA 2023 Ref: SH50)	St.Nicholas Centre, St Nicholas Way, Sutton, SM1 1AW		2.10	Sutton Town Centre	Employment (Class E)	<ul style="list-style-type: none"> • Retail • Offices • Library • Cafe and Restaurants • Leisure • Health • Residential • Class E • Class F1 • Class F2 	PTAL Level: 6a Ownership: Private Flood Risk: No Open Space: No Heritage: No Permissions: No Comments: No
STC43 (HELAA 2023 Ref: SH223)	St.Nicholas Centre Car Park, St Nicholas Way, Sutton, SM1 1AW		0.5	Sutton Town Centre	Car Park (Class SG) Cinema (Class SG)	<ul style="list-style-type: none"> • Car Park • Cinema • Residential • Class E 	PTAL Level: 6a Ownership: Private Flood Risk: No Open Space: No Heritage: No Permissions: No Comments: No





STC44 (HELAA 2023 Ref: SH145)	Sutton West Centre, Robin Hood Lane SM1 2SD		1.10	Sutton Town Centre	Youth / Education Services (Class F1)	<ul style="list-style-type: none"> ● Residential ● Education (Class F1) 	PTAL Level: 4 Ownership: Council Flood Risk: No Open Space: No Heritage: No Permissions: No Comments: No
STC45 (HELAA 2023 Ref: SH153)	31-35 St Nicholas Way, Sutton SM1 1JN		0.09	Sutton Town Centre	Employment (Class E)	<ul style="list-style-type: none"> ● Residential ● Class E 	PTAL Level: 6a Ownership: Private Flood Risk: No Open Space: No Heritage: No Permissions: No Comments: No
STC46 (HELAA 2023 Ref: SH29)	219 - 227 High Street, Sutton, SM1 1LB (Former Argos)		0.09	Sutton Town Centre	Employment (Class E)	<ul style="list-style-type: none"> ● Residential ● Class E 	PTAL Level: 6a Ownership: Private Flood Risk: No Open Space: No Heritage: No Permissions: Yes Comments: No
STC47 (HELAA 2023 Ref: SH150)	Bus Garage, Bushey Road, Sutton SM1 1QJ		0.55	Sutton Town Centre	Bus Garage (Class SG)	<ul style="list-style-type: none"> ● Residential ● Bus Garage (Sui Generis) 	PTAL Level: 4 Ownership: Private Flood Risk: No Open Space: No Heritage: No Permissions: No Comments: No
STC48 (HELAA 2023 Ref: SH202)	Chaucer Estate, Milton Road, Sutton SM1 2RA		3.06	Sutton Town Centre	Residential	<ul style="list-style-type: none"> ● Residential ● Class E ● Health 	PTAL Level: 2 Ownership: Council Flood Risk: No Open Space: No Heritage: No Permissions: No Comments: No





STC49 (HELAA 2023 Ref: SH203)	Collingwood Estate, Sutton, Collingwood Road, Sutton SM1 1RX		2.83	Sutton Town Centre	Residential	<ul style="list-style-type: none"> ● Residential ● Class E ● Health 	PTAL Level: 4 Ownership: Council Flood Risk: No Open Space: No Heritage: No Permissions: No Comments: No
STC50 (HELAA 2023 Ref: SH204)	Sutton Court Estate, Brighton Road, Sutton SM2 5BP		2.03	Sutton Town Centre API	Residential	<ul style="list-style-type: none"> ● Residential ● Class E ● Health 	PTAL Level: 5 Ownership: Council Flood Risk: No Open Space: No Heritage: No Permissions: No Comments: No
STC51 (HELAA 2023 Ref: SH144)	Eothen 31 Worcester Road, Sutton SM2 6PT		0.22	Sutton Town Centre API	Residential (Class C3)	<ul style="list-style-type: none"> ● Residential 	PTAL Level: 4 Ownership: Private Flood Risk: No Open Space: No Heritage: No Permissions: Yes Comments: No
STC52 (HELAA 2023 Ref: SH23)	Norman House, 70 Cheam Road, Sutton, SM1 2SU		0.17	Sutton Town Centre API	Residential (Class C3)	<ul style="list-style-type: none"> ● Retirement / Care Homes (Class C2) 	PTAL Level: 6a Ownership: Private Flood Risk: No Open Space: No Heritage: No Permissions: Yes Comments: No
STC53 (HELAA 2023 Ref: SH140)	69-71 Brighton Road and 2 Cavendish Road, Sutton, SM2 5BT		0.15	Sutton Town Centre API	Residential Care Home (Class C2)	<ul style="list-style-type: none"> ● Retirement (Class C3) 	PTAL Level: 5 Ownership: Private Flood Risk: No Open Space: No Heritage: No Permissions: No Comments: Refused Planning Application






WALLINGTON (W) District Centre and API							
W1 (HELAA 2023 Ref: SH57)	BTS House, 69 - 73 Manor Road, Wallington, SM6 0DD		0.15	Wallington	Employment (Class E)	<ul style="list-style-type: none"> ● Residential ● Class E 	PTAL Level: 4 Ownership: Private Flood Risk: No Open Space: No Heritage: No Permissions: No Comments: No
W2 (HELAA 2023 Ref: SH206)	Melbourne Road Car Park, Wallington SM6 8SF		0.23	Wallington	Public Car Parking (SG)	<ul style="list-style-type: none"> ● Residential ● Class E ● Public Car Parking (Sui Generis) 	PTAL Level: 4 Ownership: Private Flood Risk: No Open Space: No Heritage: No Permissions: No Comments: No
W3 (HELAA 2023 Ref: SH208)	Wallington Telephone Exchange, Melbourne Road, Wallington SM6 8SD		0.17	Wallington	Telephone Exchange (SG)	<ul style="list-style-type: none"> ● Residential ● Telephone Exchange (SG) 	PTAL Level: 4 Ownership: Private Flood Risk: No Open Space: No Heritage: No Permissions: No Comments: No
W4 (HELAA 2023 Ref: SH46)	Shell Garage, 102 Manor Road, Wallington, SM6 0DW		0.25	Wallington	Petrol Station (Sui Generis)	<ul style="list-style-type: none"> ● Residential ● Class E ● Petrol Station (SG) 	PTAL Level: 4 Ownership: Private Flood Risk: No Open Space: No Heritage: No Permissions: No Comments: No





W5 (HELAA 2023 Ref: SH207)	Wallington Delivery Office, Grosvenor Road, Wallington SM6 0EN		0.34	Wallington	Postal Sorting Office (SG)	<ul style="list-style-type: none"> • Residential • Class E • Postal Sorting Office (SG) 	PTAL Level: 4 Ownership: Private Flood Risk: No Open Space: No Heritage: No Permissions: No Comments: No
W6 (HELAA 2023 Ref: SH183)	Railway Approach, Wallington SM6 0DZ		1.100	Wallington	Train Station Car Park (Class SG) Offices (Class E) Retail (Class E)	<ul style="list-style-type: none"> • Car Park (Sui Generis) • Offices (Class E) • Retail (Class E) • Residential 	PTAL Level: 4 Ownership: Council / Private Flood Risk: No Open Space: No Heritage: No Permissions: No Comments: No
W7 (HELAA 2023 Ref: SH184)	Lidl Site, Beddington Gardens, Wallington SM6 0HU		0.300	Wallington	Retail (Class E)	<ul style="list-style-type: none"> • Retail (Class E) • Residential 	PTAL Level: 4 Ownership: Council Flood Risk: No Open Space: No Heritage: No Permissions: No Comments: No
W8 (HELAA 2023 Ref: SH186)	Manor Road / Ross Parade (The Whispering Moon Pub) SM6 8QF		0.150	Wallington	Pub (Class SG), Retail (Class E) Residential (Class C3)	<ul style="list-style-type: none"> • Pub (Sui Generis) • Retail (Class E) • Residential 	PTAL Level: 4 Ownership: Council Flood Risk: No Open Space: No Heritage: No Permissions: No Comments: No





W9 (HELAA 2023 Ref: SH187)	Travis Perkins, 21 Ross Parade Wallington SM6 8QF		0.150	Wallington District Centre	Builders Merchant (Class SG)	<ul style="list-style-type: none"> ● Class E ● Residential 	PTAL Level: 4 Ownership: Private Flood Risk: No Open Space: No Heritage: No Permissions: No Comments: No
W10 (HELAA 2023 Ref: SH36)	Sainsbury's, 2 Stafford Rd, Wallington, SM6 9AA		0.80	Wallington	Supermarket (Class E)	<ul style="list-style-type: none"> ● Residential ● Class E 	PTAL Level: 4 Ownership: Private Flood Risk: No Open Space: No Heritage: No Permissions: No Comments: No
W11 (HELAA 2023 Ref: SH117)	Shotfield Car Park, Shotfield Road, Wallington SM6 0EU		0.40	Wallington	Public Car Park (Sui Generis)	<ul style="list-style-type: none"> ● Residential ● Public Car Parking (SG) 	PTAL Level: 4 Ownership: Council Flood Risk: No Open Space: No Heritage: No Permissions: No Comments: No
W12 (HELAA 2023 Ref: SH9)	Former Wallington Hall Car Park, Wallington, SM6 0PR		0.26	Wallington	Car Parking (Sui Generis)	<ul style="list-style-type: none"> ● Residential 	PTAL Level: 3 Ownership: Council Flood Risk: No Open Space: No Heritage: No Permissions: No Comments: No






W13 (HELAA 2023 Ref: SH25)	Crosspoint House, 28 Stafford Road, Wallington, SM6 9AA		0.25	Wallington	Employment (Class E)	<ul style="list-style-type: none"> ● Residential ● Class E 	PTAL Level: 4 Ownership: Private Flood Risk: No Open Space: No Heritage: No Permissions: Yes Comments: No
W14 (HELAA 2023 Ref: SH185)	Land Rear of 105 Stafford Road, Wallington SM6 9AP		0.130	Wallington District Centre	Warehouse (Class B8) Retail (Class E)	<ul style="list-style-type: none"> ● Residential ● Class E ● Warehouse (B8) 	PTAL Level: 4 Ownership: Council Flood Risk: No Open Space: No Heritage: No Permissions: No Comments: No
W15 (HELAA 2023 Ref: SH209)	Land at St Elpheges Church, Stafford Road, Wallington SM6 9AY		0.18	Wallington District Centre	Car Parking (SG)	<ul style="list-style-type: none"> ● Residential ● Class E 	PTAL Level: 4 Ownership: Private Flood Risk: No Open Space: No Heritage: No Permissions: No Comments: No
W16 (HELAA 2023 Ref: SH31)	Cloverdale Court, 10 Stanley Park Road, Wallington, SM6 0EU		0.32	Wallington	Residential Care Home (Class C2)	<ul style="list-style-type: none"> ● Residential 	PTAL Level: 3 Ownership: Private Flood Risk: No Open Space: No Heritage: No Permissions: Yes Comments: No





W17 (HELAA 2023 Ref: SH188)	Land Rear of 16-18 Stanley Park Road / Holmwood Gardens SM6 0EU		0.090	Wallington	Warehouse (Class B8)	<ul style="list-style-type: none"> ● Residential 	PTAL Level: 4 Ownership: Council Flood Risk: No Open Space: No Heritage: No Permissions: No Comments: No
W18 (HELAA 2023 Ref: SH210)	Crusader Hall, Stanley Park Road, Wallington SM6 0ET		0.10	Wallington	Community (Class F2)	<ul style="list-style-type: none"> ● Residential ● Community (Class F2) 	PTAL Level: 3 Ownership: Private Flood Risk: No Open Space: No Heritage: No Permissions: No Comments: No
W19 (HELAA 2023 Ref: SH128)	Gower House, 75 Woodcote Road, Wallington SM6 0PU		0.13	Wallington	Residential (Class C3)	<ul style="list-style-type: none"> ● Residential 	PTAL Level: 3 Ownership: Private Flood Risk: No Open Space: No Heritage: No Permissions: Yes Comments: No
Hackbridge (H) District Centre and API							
H1 (HELAA 2023 Ref: SH94)	Felnex Trading Estate, London Road, Hackbridge		7.70	Hackbridge	Mixed Use - Residential (Class C3) / Employment (Class E)	<ul style="list-style-type: none"> ● Residential ● Class E ● Class B 	PTAL Level: 2 Ownership: Private Flood Risk: No Open Space: No Heritage: No Permissions: Yes Comments: No





H2 (HELAA 2023 Ref: SH180)	Land adj Hackbridge Station, London Road, Hackbridge SM6 7BJ		1.2	Hackbridge	Employment (Class B2 / B8 / SG)	<ul style="list-style-type: none"> • Residential • Class E • Class B 	PTAL Level: 3 Ownership: Private Flood Risk: No Open Space: No Heritage: No Permissions: No Comments: No
H3 (HELAA 2023 Ref: SH182)	Hackbridge Station, London Road, Hackbridge SM6 7BJ		0.300	Hackbridge District Centre	Train Station Car Park (Class SG)	<ul style="list-style-type: none"> • Residential • Class E • Car Parking (Sui Generis) 	PTAL Level: 3 Ownership: Private Flood Risk: No Open Space: No Heritage: No Permissions: No Comments: No
H4 (HELAA 2023 Ref: SH27)	Vulcan House, Restmor Way, Hackbridge, SM6 7GF		0.08	Hackbridge	Employment (Class E)	<ul style="list-style-type: none"> • Residential 	PTAL Level: 2 Ownership: Private Flood Risk: No Open Space: No Heritage: No Permissions: Yes Comments: No
H5 (HELAA 2023 Ref: SH69)	Land East of Sandmartin Way (BedZED), SM6 7DF		0.50	Hackbridge	Green Space (Class F2)	<ul style="list-style-type: none"> • Community • Open space 	PTAL Level: 2 Ownership: Council Flood Risk: No Open Space: No Heritage: Yes Permissions: No Comments: Part in MOL02
H6 (HELAA 2023 Ref: SH181)	Hackbridge Primary School, Land north of BedZED, Hackbridge		1.59	Hackbridge	Primary School Open Space	<ul style="list-style-type: none"> • Primary School • Open Space 	PTAL Level: 2 Ownership: Council Flood Risk: No Open Space: No Heritage: Yes Permissions: No Comments: Part in MOL02






OTHER DISTRICT CENTRES (DC) and APIs							
DC1 (HELAA 2023 Ref: SH33)	The Grove House, Grove Park, High Street, Carshalton, SM5 3AL		0.08	Carshalton	Employment (Class E)	<ul style="list-style-type: none"> Residential 	PTAL Level: 3 Ownership: Council Flood Risk: No Open Space: Yes Heritage: Yes Permissions: Yes Comments: MOL06
DC2 (HELAA 2023 Ref: SH199)	Charles Cryer Theatre, High Street, Carshalton SM5 3BB		0.07	Carshalton District Centre	Community (Class F2) Restaurant (Class E)	<ul style="list-style-type: none"> Community (Class F2) Restaurant (Class E) 	PTAL Level: 3 Ownership: Council Flood Risk: No Open Space: No Heritage: Conservation Area Permissions: No Comments: No
DC3 (HELAA 2023 Ref: SH37)	Former Fox & Hounds Public House, 41 High Street, Carshalton, SM5 3BB		0.14	Carshalton	Public House (Sui Generis)	<ul style="list-style-type: none"> Residential Public House (SG) Class E 	PTAL Level: 4 Ownership: Private Flood Risk: No Open Space: No Heritage: Conservation Area Permissions: No Comments: No
DC4 (HELAA 2023 Ref: SH221)	Greenview House, 5 Manor Road Wallington SM6 0BW		0.1	Wallington	Vacant Offices (Class E)	<ul style="list-style-type: none"> Class E Education (Class F) Residential 	PTAL Level: 3 Ownership: Private Flood Risk: No Open Space: No Heritage: Conservation Area Permissions: Yes Comments: No





<p>DC5 (HELAA 2023 Ref: SH102)</p>	<p>Former HSS Hire, 53 Malden Road Cheam SM3 8QW</p>		<p>0.14</p>	<p>Cheam Village District Centre</p>	<p>Former Employment (Class E)</p>	<ul style="list-style-type: none"> ● Residential 	<p>PTAL Level: 3 Ownership: Private Flood Risk: No Open Space: No Heritage: Adj to Conservation Area Permissions: Yes Comments: No</p>
<p>DC6 (HELAA 2023 Ref: SH91)</p>	<p>Tesco Esso Express (with petrol station), 50 Malden Road, Cheam, Sutton, SM3 8HB</p>		<p>0.15</p>	<p>Cheam</p>	<p>Supermarket (Class E)</p>	<ul style="list-style-type: none"> ● Residential ● Class E 	<p>PTAL Level: 3 Ownership: Private Flood Risk: No Open Space: No Heritage: Adj to Conservation Area Permissions: No Comments: No</p>
<p>DC7 (HELAA 2023 Ref: SH58)</p>	<p>Cheam Library, Church Road, Cheam, Sutton, SM3 8QH</p>		<p>0.30</p>	<p>Cheam</p>	<p>Library (Class F1) Public Car Parking (Sui Generis)</p>	<ul style="list-style-type: none"> ● Library (Class F1) ● Health (Class E) ● Other (Sui Generis) ● Residential ● Public Car Parking (SG) 	<p>PTAL Level: 3 Ownership: Council Flood Risk: No Open Space: No Heritage: Yes Permissions: No Comments: No</p>
<p>DC8 (HELAA 2023 Ref: SH107)</p>	<p>Anne Boleyn House 9 - 13 Ewell Road Cheam SM3 8BZ</p>		<p>0.10</p>	<p>Cheam Village</p>	<p>Former Employment (Class E)</p>	<ul style="list-style-type: none"> ● Residential 	<p>PTAL Level: 3 Ownership: Private Flood Risk: No Open Space: No Heritage: Conservation Area Permissions: Yes Comments: No</p>






DC9 (HELAA 2023 Ref: SH26)	Oceantech House, Station Approach, Cheam, SM2 7AU		0.60	Cheam	Employment (Class E)	<ul style="list-style-type: none"> Residential 	PTAL Level: 2 Ownership: Private Flood Risk: No Open Space: No Heritage: No Permissions: Yes Comments: No
DC10 (HELAA 2023 Ref: SH211)	Peaches Court Sports Club, Peaches Close, Cheam SM2 7BJ		0.18	Cheam	Car Parking (SG)	<ul style="list-style-type: none"> Residential Community (Class F2) Car Parking (Sui Generis) 	PTAL Level: 2 Ownership: Private Flood Risk: No Open Space: No Heritage: No Permissions: No Comments: No
DC11 (HELAA 2023 Ref: SH34)	Former HG Wells Public House, 101 Cheam Common Rd, Worcester Park, KT4 8TA		0.20	North Cheam	Public House (Sui Generis)	<ul style="list-style-type: none"> Residential Public House (SG) 	PTAL Level: 2 Ownership: Private Flood Risk: No Open Space: No Heritage: No Permissions: No Comments: No
DC12 (HELAA 2023 Ref: SH190)	Resource Centre, Covey Road / London Road SM3 9DL		0.370	North Cheam	Community (Class F2) and Offices (Class E)	<ul style="list-style-type: none"> Residential Community (Class F2) Class E (Offices) 	PTAL Level: 3 Ownership: Council Flood Risk: No Open Space: No Heritage: No Permissions: No Comments: No
DC13 (HELAA 2023 Ref: SH90)	Tesco Esso Express (with petrol station), 668 London Road, Sutton, SM3 9BY		0.15	North Cheam	Petrol Station (Sui Generis) Supermarket (Class E)	<ul style="list-style-type: none"> Residential Class E Petrol Station (SG) 	PTAL Level: 2 Ownership: Private Flood Risk: No Open Space: No Heritage: No Permissions: No Comments: No






<p>DC14 (HELAA 2023 Ref: SH87)</p>	<p>Sainsbury's, 566 London Road, Sutton, SM3 9AA</p>		<p>2.90</p>	<p>North Cheam</p>	<p>Supermarket (Class E) Cafe (Class E)</p>	<ul style="list-style-type: none"> ● Residential ● Class E 	<p>PTAL Level: 2 Ownership: Private Flood Risk: No Open Space: No Heritage: No Permissions: No Comments: No</p>
<p>DC15 (HELAA 2023 Ref: SH115)</p>	<p>Former Victoria House, 388 Malden Road, Cheam, SM3 8HY</p>		<p>0.28</p>	<p>Cheam District Centre</p>	<p>Vacant - Previously Employment (Class E)</p>	<ul style="list-style-type: none"> ● Residential ● Class E ● Class F 	<p>PTAL Level: 3 Ownership: Private Flood Risk: No Open Space: No Heritage: No Permissions: Yes Comments: No</p>
<p>DC16 (HELAA 2023 Ref: SH189)</p>	<p>Cheam Leisure Centre, Malden Road / Priory Crescent SM3 8EP</p>		<p>1.280</p>	<p>North Cheam</p>	<p>Community (Class F2) and Health (Class E)</p>	<ul style="list-style-type: none"> ● Community (Class F2) ● Health (Class E) 	<p>PTAL Level: 2 Ownership: Council Flood Risk: No Open Space: No Heritage: No Permissions: No Comments: No</p>
<p>DC17 (HELAA 2023 Ref: SH200)</p>	<p>Hill House, Bishopsford Road, Rosehill SM4 6BL</p>		<p>1.05</p>	<p>Rosehill</p>	<p>Community (Class F2)</p>	<ul style="list-style-type: none"> ● Community (Class F2) ● Residential 	<p>PTAL Level: 2 Ownership: Council Flood Risk: No Open Space: No Heritage: Listed Building Permissions: No Comments: No</p>





<p>DC18</p> <p>(HELAA 2023 Ref: SH43)</p>	<p>St Helier Ambulance Station, Bishopsford Road, Carshalton, Morden, SM4 6BN</p>		<p>0.30</p>	<p>St.Helier</p>	<p>Ambulance Station (Sui Generis)</p>	<ul style="list-style-type: none"> ● Residential ● Ambulance Station (Sui Generis) 	<p>PTAL Level: 2 Ownership: Public Flood Risk: No Open Space: No Heritage: Yes Permissions: No Comments: No</p>
<p>DC19</p> <p>(HELAA 2023 Ref: SH191)</p>	<p>Lidl Rosehill, Wrythe Lane, Rosehill SM5 1AD</p>		<p>0.43</p>	<p>Rosehill District Centre</p>	<p>Retail (Class E)</p>	<ul style="list-style-type: none"> ● Retail (Class E) ● Residential 	<p>PTAL Level: 3 Ownership: Private Flood Risk: No Open Space: No Heritage: ASLC Permissions: No Comments: No</p>
<p>DC20</p> <p>(HELAA 2023 Ref: SH101)</p>	<p>102-104 Rose Hill, Sutton, SM1 3HB</p>		<p>0.98</p>	<p>Rosehill</p>	<p>Residential (Class C3)</p>	<ul style="list-style-type: none"> ● Residential 	<p>PTAL Level: 3 Ownership: Private Flood Risk: No Open Space: No Heritage: No Permissions: Yes Comments: No</p>
<p>DC21</p> <p>(HELAA 2023 Ref: SH56)</p>	<p>St Helier Hospital, Wrythe Lane, Sutton, Carshalton, SM5 1AA</p>		<p>4.00</p>	<p>St.Helier</p>	<p>Hospital (Class C2) Public Car Parking (Sui Generis)</p>	<ul style="list-style-type: none"> ● Residential ● Hospital (Class C2) ● Health (Class E) ● Public Car Parking (SG) 	<p>PTAL Level: 2 Ownership: Public Flood Risk: No Open Space: Yes Heritage: No Permissions: No Comments: No</p>






DC22 (HELAA 2023 Ref: SH214)	Worcester Park Telephone Exchange and Royal Mail, Longfellow Road Kt4 8BB		0.36	Worcester Park	Telephone Exchange and Sorting Office (Sui Generis)	<ul style="list-style-type: none"> ● Residential ● Class E ● Telephone Exchange and Sorting Office (SG) 	PTAL Level: 3 Ownership: Private Flood Risk: No Open Space: No Heritage: No Permissions: No Comments: No
DC23 (HELAA 2023 Ref: SH213)	165-181 Central Road, Worcester Park KT4 8DR		0.44	Worcester Park	Retail (Class E) Offices (Class E) Public House (Class SG) Residential (Class C3) Open Space.	<ul style="list-style-type: none"> ● Class E ● Public House (Sui Generis) ● Residential ● Open Space. 	PTAL Level: 3 Ownership: Private Flood Risk: No Open Space: Yes Heritage: No Permissions: No Comments: No
DC24 (HELAA 2023 Ref: SH212)	Land at 1 Lynwood Drive, Worcester Park KT4 7AA		0.13	Worcester Park	Community (Class F2) Car Parking (SG)	<ul style="list-style-type: none"> ● Residential (Use Class C3) ● Community (Class F2) ● Class E (Health) 	PTAL Level: 3 Ownership: Private Flood Risk: No Open Space: No Heritage: No Permissions: No Comments: No
DC25 (HELAA 2023 Ref: SH215)	Stoneplace Car Park, 133B Central Road, Worcester Park KT4 8DY		0.27	Worcester Park	Car Parking (SG)	<ul style="list-style-type: none"> ● Residential ● Class E ● Car Parking (Sui Generis) 	PTAL Level: 3 Ownership: Council Flood Risk: No Open Space: No Heritage: No Permissions: No Comments: No
DC26 (HELAA 2023 Ref: SH111)	1-9 Windsor Road & 81-85 Central Road, Worcester Park KT4 8EB		0.10	Worcester Park	Mixed use - Residential (Class C3) / Restaurant (Class E / Offices (Class E)	<ul style="list-style-type: none"> ● Residential ● Class E 	PTAL Level: 3 Ownership: Private Flood Risk: No Open Space: No Heritage: No Permissions: Yes Comments: No





DC27 (HELAA 2023 Ref: SH22)	Griffiths Close, 209 Cheam Common Road, Worcester Park, KT4 8SL		0.41	Worcester Park	Residential Care Home (Class C2)	<ul style="list-style-type: none"> ● Retirement / Care Homes (Class C2) 	PTAL Level: 2 Ownership: Private Flood Risk: No Open Space: No Heritage: No Permissions: Yes Comments: No
DC28 (HELAA 2023 Ref: SH63)	Land North of Braemar Road, Worcester Park, Sutton, KT4 8SW		0.59	Worcester Park	Green Space / Housing Amenity Land / Community (Class F2)	<ul style="list-style-type: none"> ● Residential ● Community (Class F2) 	PTAL Level: 1b Ownership: Private Flood Risk: No Open Space: No Heritage: No Permissions: No Comments: No
DC29 (HELAA 2023 Ref: SH222)	Westcroft Leisure Centre, Westcroft Rd, Carshalton SM5 2TG		1.5	Carshalton	Sports, recreation and leisure, indoor sports (Class E and Class F2), Library (Class F1), cafe (Class E)	<ul style="list-style-type: none"> ● Indoor sports and recreation ● Leisure ● Community ● Gym ● Class F2 ● Library (Class F1) ● Cafe (Class E) 	PTAL Level: 3 Ownership: Council Flood Risk: No Open Space: No Heritage: No Permissions: No Comments: No
SUBURBAN HEARTLANDS (SB)							
SB1 (HELAA 2023 Ref: SH19)	Haredon House, 810 London Road, North Cheam, Sutton, SM3 9BJ		0.20	North Cheam	Residential (Class C3) / Employment (Class E) / Retail (Class E)	<ul style="list-style-type: none"> ● Residential 	PTAL Level: 2 Ownership: Private Flood Risk: No Open Space: No Heritage: No Permissions: Yes Comments: No





SB2 (HELAA 2023 Ref: SH77)	Wilsons Van Centre, 730-736 London Road, Sutton, SM3 9BY		0.28	North Cheam	Employment (Class E)	<ul style="list-style-type: none"> • Residential • Class E 	PTAL Level: 2 Ownership: Private Flood Risk: No Open Space: No Heritage: No Permissions: No Comments: No
SB3 (HELAA 2023 Ref: SH219)	Stonecot Car Wash, Sutton Common Road, Sutton SM3 9HA		0.13	Stonecot	Car Wash (Class Sui Generis)	<ul style="list-style-type: none"> • Residential • Class E 	PTAL Level: 2 Ownership: Private Flood Risk: No Open Space: No Heritage: No Permissions: No Comments: No
SB4 (HELAA 2023 Ref: SH4)	Former Mortuary, Sutton Cemetery, Alcorn Close, Sutton SM3 9PX		1.10	Stonecot	Mixed Use - Disused mortuary site (SG) / Groundsman mess and drying rooms (used) (Sui Generis) / Storage buildings (used) (Class B8) / Land reserved for burial space use (unused) (Sui Generis).	<ul style="list-style-type: none"> • Residential • Class E 	PTAL Level: 2 Ownership: Council Flood Risk: No Open Space: MOL Heritage: No Permissions: No Comments: Mess Hall and Storage needs to be re-provided Call for Sites
SB5 (HELAA 2023 Ref: SH92)	Tesco Extra (with petrol station and car park), 55 Oldfields Road, Sutton, SM1 2NB		3.70	Stonecot	Supermarket (Class E) Petrol Station (SG) Car Park	<ul style="list-style-type: none"> • Class E • Petrol Station • Employment (Class B2/B8) • Residential 	PTAL Level: 2 Ownership: Private Flood Risk: Yes Open Space: No Heritage: No Permissions: No Comments: No
SB6 (HELAA 2023 Ref: SH135)	9 St Dunstons Hill, Cheam, SM1 2JX		0.13	Cheam	Employment (Class E)	<ul style="list-style-type: none"> • Residential • Class E 	PTAL Level: 2 Ownership: Private Flood Risk: No Open Space: No Heritage: No Permissions: No Comments: Previously Refused.






SB7 (HELAA 2023 Ref: SH193)	Sutton United Football Club, Gander Green Lane, Sutton SM1 2EY		2.4	Sutton	Sports Ground Community Facilities (Class F2)	<ul style="list-style-type: none"> ● Sports Ground Community Facilities (Class F2) 	PTAL Level: 2 Ownership: Council Flood Risk: No Open Space: No Heritage: No Permissions: No Comments: No
SB8 (HELAA 2023 Ref: SH11)	Rosehill Recreation Ground, Rose Hill, Sutton, SM1 3HH		5.82	Rosehill	Former all-weather sports pitch, astroturf tennis courts, and single storey building (Class F2)	<ul style="list-style-type: none"> ● Education (Class F1) 	PTAL Level: 2 / 3 / 4 Ownership: Council Flood Risk: No Open Space: No Heritage: No Permissions: Yes Comments: MOL16
SB9 (HELAA 2023 Ref: SH48)	Tesco Express, 77 Angel Hill, Sutton, SM1 3EH		0.22	Sutton	Supermarket (Class E)	<ul style="list-style-type: none"> ● Residential ● Class E 	PTAL Level: 4 Ownership: Private Flood Risk: No Open Space: No Heritage: No Permissions: Yes Comments: No
SB10 (HELAA 2023 Ref: SH216)	All Saints Hall, Benhill Wood Road SM1 3SR		0.39	Sutton North	Community (Class F2) Car Parking (SG)	<ul style="list-style-type: none"> ● Residential ● Community (Class F2) 	PTAL Level: 3 Ownership: Private Flood Risk: No Open Space: No Heritage: No Permissions: No Comments: No
SB11 (HELAA 2023 Ref: SH103)	Land to the Rear of Middleton Circle, Assembly Walk, The Wrythe, SM5 1JH		0.12	The Wrythe	Place of Worship (Class F1)	<ul style="list-style-type: none"> ● Residential ● Place of Worship (Class F1) 	PTAL Level: 2 Ownership: Private Flood Risk: No Open Space: No Heritage: No Permissions: Yes Comments: No





SB12 (HELAA 2023 Ref: SH196)	Waltham Road Depot, Waltham Road, the Wrythe. SM5 1PW		0.12	The Wrythe	Former Depot and Garages (Class SG)	<ul style="list-style-type: none"> Residential 	PTAL Level: 2 Ownership: Council Flood Risk: No Open Space: No Heritage: No Permissions: No Comments: No
SB13 (HELAA 2023 Ref: SH137)	2-4 Prince Of Wales Road, Sutton, SM1 3PA		0.12	The Wrythe	Residential (Class C3)	<ul style="list-style-type: none"> Residential 	PTAL Level: 2 Ownership: Private Flood Risk: No Open Space: No Heritage: No Permissions: No Comments: Previously Refused
SB14 (HELAA 2023 Ref: SH45)	Access Self Storage Sutton, 107 Westmead Road, Sutton, SM1 4JD		0.50	Carshalton	Employment (Class B8)	<ul style="list-style-type: none"> Residential Class B8 	PTAL Level: 2 Ownership: Private Flood Risk: No Open Space: No Heritage: No Permissions: Yes Comments: No
SB15 (HELAA 2023 Ref: SH44)	Former Chelsea Timber Merchants Ltd, 71-74 Westmead Road, Sutton, SM1 4JF		0.25	Carshalton	Employment (Class E)	<ul style="list-style-type: none"> Residential 	PTAL Level: 2 Ownership: Private Flood Risk: No Open Space: No Heritage: No Permissions: Yes Comments: No





SB16 (HELAA 2023 Ref: SH195)	Allen House, Westmead Road, Carshalton SM1 4JT		0.04	Carshalton	Offices (Class E)	<ul style="list-style-type: none"> • Residential 	PTAL Level: 2 Ownership: Private Flood Risk: No Open Space: No Heritage: No Permissions: No Comments: No
SB17 (HELAA 2023 Ref: SH218)	Ambulance Station, Harrow Road Carshalton SM5 3QF		0.09	Carshalton Central	Ambulance Station (Class SG)	<ul style="list-style-type: none"> • Community (Class F2) • Residential 	PTAL Level: 2 Ownership: Public Flood Risk: No Open Space: No Heritage: No Permissions: No Comments: No
SB18 (HELAA 2023 Ref: SH217)	Carshalton Institute and Social Club, North Street, Carshalton SM5 2HW		0.09	Carshalton Central	Community (Class F2) Car Parking (SG)	<ul style="list-style-type: none"> • Community (Class F2) • Car Parking (Sui Generis) • Residential (Class C3) 	PTAL Level: 3 Ownership: Private Flood Risk: No Open Space: No Heritage: No Permissions: No Comments: No
SB19 (HELAA 2023 Ref: SH118)	Council Offices, Denmark Road, Carshalton SM5 2JG		0.40	Carshalton	Former Employment (Class E)	<ul style="list-style-type: none"> • Residential 	PTAL Level: 3 Ownership: Council Flood Risk: No Open Space: No Heritage: No Permissions: No Comments: No
SB20 (HELAA 2023 Ref: SH119)	Council Car Park, Denmark Road, Carshalton		0.40	Carshalton	Former Car Park (Sui Generis)	<ul style="list-style-type: none"> • Residential 	PTAL Level: 3 Ownership: Council Flood Risk: No Open Space: No Heritage: No Permissions: No Comments: No





SB21 (HELAA 2023 Ref: SH2)	Land at Jessops Way, Croydon, CR0 4TS (OPTION 1)		12.0	Beddington	Mixed Use - Go-karting track (Class F2) / Employment (B2 / B8) / MOL	<ul style="list-style-type: none"> ● Industrial - Class B2/B8 ● Class E (ii) and (iii) ● Residential <p>This site was a 'Call for Sites' submission. Inclusion here does not necessarily mean the Council agrees with the suggested use. It is included for the purposes of consultation.</p>	PTAL Level: 2 / 3 Ownership: Private Flood Risk: No Open Space: MOL02 Heritage: No Permissions: No Comments: SINC, Green Corridor and Wandle Valley Regional Park
SB22 (HELAA 2023 Ref: SH3)	Land at Jessops Way, Croydon, CR0 4TS (OPTION 2)		4.13	Beddington	Mixed Use - Go-karting track (Class F2) / Employment (B2 / B8) / MOL	<ul style="list-style-type: none"> ● Industrial - Class B2/B8 ● Class E (ii) and (iii) <p>This site was a 'Call for Sites' submission. Inclusion here does not necessarily mean the Council agrees with the suggested use. It is included for the purposes of consultation.</p>	PTAL Level: 2 / 3 Ownership: Private Flood Risk: No Open Space: MOL02 Heritage: No Permissions: No Comments: SINC, Green Corridor and Wandle Valley Regional Park
SB23 (HELAA 2023 Ref: SH15)	Land West of Beddington Lane, Sutton, CR0 4TS		0.11	Beddington	MOL (MOL02) MGC (MGC03)	<ul style="list-style-type: none"> ● Industrial - Class B2/B8 ● Class E (ii) and (iii) <p>This site was a 'Call for Sites' submission. Inclusion here does not necessarily mean the Council agrees with the suggested use. It is included for the purposes of consultation.</p>	PTAL Level: 0 / 2 Ownership: Private Flood Risk: No Open Space: MOL02 Heritage: No Permissions: No Comments: SINC, Green Corridor and Wandle Valley Regional Park
SB24 (HELAA 2023 Ref: SH83)	777 Recycling Centre, 11 Coomber Way, Croydon, CR0 4TQ		1.00	Beddington	Former Waste / Recycling (designated)	<ul style="list-style-type: none"> ● Industrial - Class B2/B8 ● Class E (ii) and (iii) 	PTAL Level: 2 Ownership: Private Flood Risk: No Open Space: No Heritage: Yes Permissions: No Comments: No





SB25 (HELAA 2023 Ref: SH221)	156-160 Beddington Lane, Beddington CR0 4TE		1.81	Beddington	Former Waste / Recycling (de-designated)	<ul style="list-style-type: none"> ● Industrial - Class B2/B8 ● Class E (ii) and (iii) 	PTAL Level: 2 Ownership: Private Flood Risk: No Open Space: No Heritage: No Permissions: No Comments: No
SB26 (HELAA 2023 Ref: SH222)	Former European Metal Recycling, Therapia Lane, Beddington		0.95	Beddington	Former Waste / Recycling (de-designated)	<ul style="list-style-type: none"> ● Industrial - Class B2/B8 ● Class E (ii) and (iii) 	PTAL Level: 2 Ownership: Private Flood Risk: No Open Space: No Heritage: No Permissions: No Comments: No
SB27 (HELAA 2023 Ref: SH86)	Beddington Sub-Area 3: Asda Marlowe Way, Beddington, Sutton, CR0 4XS		3.60	Beddington	Supermarket (Class E)	<ul style="list-style-type: none"> ● Industrial - Class B2/B8 ● Class E (ii) and (iii) ● Supermarket (Class E) 	PTAL Level: 2 Ownership: Private Flood Risk: No Open Space: No Heritage: No Permissions: No Comments: No
SB28 (HELAA 2023 Ref: SH84)	Beddington Sub-Area 3: Beddington South - 112 Beddington Lane, CR9 4EP		0.74	Beddington	Employment (Class B2 / Class B8)	<ul style="list-style-type: none"> ● Industrial - Class B2/B8 	PTAL Level: 1b Ownership: Private Flood Risk: No Open Space: No Heritage: No Permissions: No Comments: No




SB29 (HELAA 2023 Ref: SH59)	Former PB Builders, 30 - 32 Beddington Lane, Beddington, Sutton, CR0 4TB		0.14	Beddington	Vacant - Previously Employment (Class E)	<ul style="list-style-type: none"> Residential 	PTAL Level: 2 Ownership: Council Flood Risk: Yes Open Space: No Heritage: Yes Permissions: No Comments: No
SB30 HELAA 2023 Ref: SH39	Land to rear of 81 Claydon Drive, Beddington, CR0 4QX		0.25	Beddington	None - Greenfield	<ul style="list-style-type: none"> Residential 	PTAL Level: 1b Ownership: Private Flood Risk: No Open Space: No Heritage: No Permissions: No Comments: No
SB31 HELAA 2023 Ref: SH198	Sheen Way Playing Fields, Sheen Way, Beddington SM6 8NQ		2.5	Beddington	Former Playing Fields / School (Class F1)	<ul style="list-style-type: none"> School (Class F1) / Open Space Public Open Space 	PTAL Level: 2 Ownership: Council Flood Risk: No Open Space: Yes Heritage: No Permissions: Yes Comments: SEND School under construction
SB32 HELAA 2023 Ref: SH201	Land at Hannibal Way Beddington / Roundshaw CR0 4RW		0.31	Roundshaw	Community (Class F2)	<ul style="list-style-type: none"> Community (Class F2) Industry (Class B) Gypsy and Traveller Site 	PTAL Level: 1b Ownership: Council Flood Risk: No Open Space: No Heritage: No Permissions: No Comments: No
SB33 (HELAA 2023 Ref: SH108)	Land to East of 41-52 Alexandra Gardens, Carshalton SM5 4LJ		0.24	Carshalton Beeches	Residential (Class C3) - Garages	<ul style="list-style-type: none"> Residential 	PTAL Level: 1b Ownership: Council Flood Risk: No Open Space: No Heritage: No Permissions: Yes Comments: No

SB34 (HELAA 2023 Ref: SH220)	1-3 Metcalfe Avenue, Carshalton SM5 4AN		1.0	Carshalton South	Driving Lessons and mobility advice (SG)	<ul style="list-style-type: none"> ● Residential ● Class E ● Employment (Class B) ● Health <p>This site was a 'Call for Sites' submission. Inclusion here does not necessarily mean the Council agrees with the suggested use. It is included for the purposes of consultation.</p>	PTAL Level: 0 Ownership: Private Flood Risk: No Open Space: Green Belt Heritage: No Permissions: No Comments: No
SB35 (HELAA 2023 Ref: SH67)	Former Carshalton Beeches Bowling Club and Land, 61 Banstead Road South, SM2 5LH		0.54	Carshalton	Outdoor Sports Ground (Class F2)	<ul style="list-style-type: none"> ● Residential 	PTAL Level: 1b Ownership: Private Flood Risk: No Open Space: No Heritage: No Permissions: No Comments: No
SB36 (HELAA 2023 Ref: SH82)	Land East of Woodmansterne Lane, Wallington, SM6 0SU		3.40	Carshalton	Garden Centre / Nursery (Class E)	<ul style="list-style-type: none"> ● Residential <p>This site was a 'Call for Sites' submission. Inclusion here does not necessarily mean the Council agrees with the suggested use. It is included for the purposes of consultation.</p>	PTAL Level: 1b Ownership: Private Flood Risk: No Open Space: Green Belt Heritage: No Permissions: No Comments: Metropolitan Green Belt (MGB1)
SB37 (HELAA 2023 Ref: SH8)	Woodcote Grove House, Orford House, Field Cottages 1-3 and Cottages 1-2, Woodcote Grove CR5 2XL		16.00	Woodcote	Residential Care Home (Class C2) and Staff Accommodation (Class C3)	<ul style="list-style-type: none"> ● Retirement / Care Homes (Class C2) ● Residential (Class C3) <p>This site was a 'Call for Sites' submission. Inclusion here does not necessarily mean the Council agrees with the suggested use. It is included for the purposes of consultation.</p>	PTAL Level: 0 Ownership: Private Flood Risk: No Open Space: Green Belt Heritage: No Permissions: Yes Comments: Metropolitan Green Belt (MGB1)

<p>SB38</p> <p>(HELAA 2023 Ref: SH224)</p>	<p>Land to the East of Grove Place, Carshalton</p>		<p>0.21</p>	<p>Woodmansterne</p>	<p>Green Belt</p>	<ul style="list-style-type: none"> • Gypsy and Traveller Site 	<p>PTAL Level: 0 Ownership: Council Flood Risk: No Open Space: Green Belt Heritage: No Permissions: No Comments: Metropolitan Green Belt (MGB1), SINC.</p>
<p>SB39</p> <p>(HELAA 2023 Ref: SH130)</p>	<p>The Mount, Clockhouse Estate, Clockhouse, Coulsdon (1)</p>		<p>0.17</p>	<p>Coulsdon</p>	<p>Residential (Class C3) / Community Centre (Class F) / Nursery (Class D)</p>	<ul style="list-style-type: none"> • Residential • Community (Class F) 	<p>PTAL Level: 1a Ownership: Council Flood Risk: No Open Space: No Heritage: Yes Permissions: No Comments: No</p>
<p>SB40</p> <p>(HELAA 2023 Ref: SH131)</p>	<p>Longlands Avenue / Hillcrest Parade, Clockhouse Estate, Coulsdon (2) CR5 2PS</p>		<p>0.37</p>	<p>Coulsdon</p>	<p>Residential (Class C3) / Employment / Shops (Class E)</p>	<ul style="list-style-type: none"> • Residential • Community (Class F) • Class E 	<p>PTAL Level: 1a Ownership: Council Flood Risk: No Open Space: No Heritage: No Permissions: No Comments: No</p>
<p>SB41</p> <p>(HELAA 2023 Ref: SH133)</p>	<p>Downlands Close, Clockhouse Estate, Clockhouse, Coulsdon (4) CR5 2QH</p>		<p>0.40</p>	<p>Coulsdon</p>	<p>Residential (Class C3)</p>	<ul style="list-style-type: none"> • Residential 	<p>PTAL Level: 1a Ownership: Council Flood Risk: No Open Space: No Heritage: No Permissions: No Comments: No</p>

SB42 (HELAA 2023 Ref: SH134)	Longlands Avenue / Pembury Close, Clockhouse Estate, Clockhouse, Coulsdon (5) CR5 2QX		0.51	Coulsdon	Residential (Class C3)	<ul style="list-style-type: none"> Residential 	PTAL Level: 1a Ownership: Council Flood Risk: No Open Space: No Heritage: No Permissions: No Comments: No
SB43 (HELAA 2023 Ref: SH32)	Trickett House, 125 Brighton Road, Sutton, SM2 5SN		0.46	Belmont	Residential (Class C3)	<ul style="list-style-type: none"> Residential 	PTAL Level: 2 Ownership: Private Flood Risk: No Open Space: No Heritage: No Permissions: Yes Comments: No
SB44 (HELAA 2023 Ref: SH41)	Sutton Ambulance Station, 18 Dorset Rd, Sutton, SM2 6HX		0.12	Belmont	Ambulance Station (Sui Generis)	<ul style="list-style-type: none"> Residential Ambulance Station (SG) 	PTAL Level: 1b Ownership: Public Flood Risk: No Open Space: No Heritage: No Permissions: No Comments: No
SB45 (HELAA 2023 Ref: SH129)	Grantley Court Nursing Home, 22 York Road, Cheam SM2 6HH		0.20	South Sutton	Residential (Class C3)	<ul style="list-style-type: none"> Residential 	PTAL Level: 1a Ownership: Private Flood Risk: No Open Space: No Heritage: No Permissions: Yes Comments: No

SB46 (HELAA 2023 Ref: SH47)	Health Education Books, Willow House, Willow Walk, Sutton, SM3 9QQ		0.10	Stonecot	Employment (Class E)	<ul style="list-style-type: none"> ● Class B ● Class E 	PTAL Level: 1b Ownership: Private Flood Risk: Yes Open Space: No Heritage: No Permissions: No Comments: No
SB47 (HELAA 2023 Ref: SH62)	Linney Fencing Limited, Nursery Gardens, Goat Road, Carshalton Road, Sutton, CR4 4HU		0.46	Hackbridge	Employment (Class E)	<ul style="list-style-type: none"> ● Employment (Class B2/B8/E) 	PTAL Level: 1b Ownership: Private Flood Risk: Zone 2 Open Space: MOL Heritage: No Permissions: No Comments: MOL07
SB48 (HELAA 2023 Ref: SH225)	Land to the south of the Pastures, Carshalton Road, Woodcote		0.58	Woodcote	Gypsy and Traveller Site	<ul style="list-style-type: none"> ● Gypsy and Traveller Site 	PTAL Level: 0 Ownership: Council Flood Risk: No Open Space: Green Belt Heritage: No Permissions: Yes Comments: Metropolitan Green Belt (MGB1), SINC.
SB49 (HELAA 2023 Ref: SH227)	Sainsbury's/ Argos Distribution Centre, Marlowe Way, Beddington. CR0 4XS		1.98	Beddington	Employment (Class B2/B8/E)	<ul style="list-style-type: none"> ● Employment (Class B2/B8/E) 	PTAL Level: 2 Ownership: Private Flood Risk: No Open Space: No Heritage: No Permissions: No Comments: No

SB50 (HELAA 2023 Ref: SH228)	Land to the south of Marlowe Way, Beddington, CR0 4XS		1.1	Beddington	Employment (Class B2/B8/E)	<ul style="list-style-type: none"> ● Employment (Class B2/B8/E) 	PTAL Level: 2 Ownership: Private Flood Risk: No Open Space: No Heritage: No Permissions: No Comments: No
SB51 (HELAA 2023 Ref: SH229)	David Weir Centre, Middleton Rd, Carshalton SM5 1SL		4.8	Rosehill	Sports, recreation and leisure, indoor and outdoor sports (Class E and Class F2)	<ul style="list-style-type: none"> ● And outdoor Indoor sports and recreation ● Leisure ● Community ● Gym ● Class F1 ● Library (Class F1) ● Cafe (Class E) 	PTAL Level: 2 Ownership: Council Flood Risk: No Open Space: No Heritage: No Permissions: Yes Comments: No
SB52 (HELAA 2023 Ref: SH230)	Wandle Valley Trading Estate, Goat Road, Hackbridge, CR4 4AZ		0.54	Hackbridge	Employment (Class B2/B8/E)	<ul style="list-style-type: none"> ● Employment (Class B2/B8/E) 	PTAL Level: 2 Ownership: Private Flood Risk: Yes Open Space: No Heritage: Listed Building Permissions: Yes Comments: No

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Annex 1: Glossary

Affordable Housing: Social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices. Affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision.

Social rented housing is owned by local authorities and private registered providers (as defined in section 80 of the Housing and Regeneration Act 2008), for which guideline target rents are determined through the national rent regime. It may also be owned by other persons and provided under equivalent rental arrangements to the above, as agreed with the local authority or with the Greater London Authority Housing and Land Directorate.

Affordable rented housing is let by local authorities or private registered providers of social housing to households who are eligible for social rented housing. Affordable Rent is subject to rent controls that require a rent of no more than 80% of the local market rent (including service charges, where applicable).

Intermediate housing is homes for sale and rent provided at a cost above social rent, but below market levels subject to the criteria in the Affordable Housing definition above. These can include shared equity (shared ownership and equity loans), other low cost homes for sale and intermediate rent, but not affordable rented housing.

Homes that do not meet the above definition of affordable housing, such as “low cost market” housing, may not be considered as affordable housing for planning purposes.

Agricultural Land: For the purposes of this document, agricultural land is defined as the Woodcote Green Belt, which is classified as Best and Most Versatile Land in the Agricultural Land Classification.

Air Quality Management Area: Areas designated by local authorities because they are not likely to achieve national air quality objectives by the relevant deadlines. The whole of the borough is designated an AQMA.

Archaeological Priority Areas: Areas where there is significant known archaeological interest or potential for new discoveries. In Sutton, they are identified by Historic England’s Greater London Archaeological Advisory Service.

Area of Potential Intensification: Areas around town centres where the intensification of housing development may be appropriate.

Area of Special Local Character: Areas designated by the Council because of their locally distinctive character in terms of townscape, architecture and/or landscape features.

Areas of Taller Building Potential : Potential areas for tall buildings.

Article 4 Direction: A local planning regulation which withdraws automatic planning permission and means a planning application is required for development. The borough

has two Article 4 Direction areas: (1) Sutton Garden Suburb to protect its unique character; and (2) a number of properties across the borough have permitted development rights withdrawn with regard to roof alterations. The council is proposing a third direction to withdraw permitted development rights that allow houses to convert to small houses in multiple occupation.

OR

Article 4 Direction: A local planning regulation which withdraws automatic planning permission and means a planning application is required for development.

Assets of Community Value: The actual current main use of the building or land furthers the social interests or social wellbeing of the local community; and it is realistic to think that there can continue to be a main use which will further the social interests or social well being of the local community (although not necessarily in the same way).

Or in the recent past, the main use of the building or land furthered the social wellbeing of the local community and it is reasonable to think that within 5 years the building or land could be brought back into a use that would further the social interests or social wellbeing of the local community (although not necessarily in the same way as before). In this context social interests include cultural, recreational and sporting interests.

The process of registering a building or land as an Asset of Community Value is set out in the Assets of Community Value (England) Regulation 2012. To find out more visit

<https://www.legislation.gov.uk/ukxi/2012/2421/contents/made> and in Commons Library Briefing Paper Assets of Community Value.

<https://researchbriefings.files.parliament.uk/documents/SN06366/SN06366.pdf>

Beddington Carrier: This is a concrete channel which carries effluent from Beddington sewage treatment works to the River Wandle.

Biodiversity: The number of different species of flora and fauna in a particular area.

Blue Infrastructure: A network of blue infrastructure rivers, brooks and springs which create a source of water to support green infrastructure.

Brownfield Land (also known as Previously Developed Land): Previously developed land: Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or has been occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures; land in built-up areas such as private residential gardens, parks, recreation grounds and allotments; and land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time.

Community Cohesion: Interaction between individuals, communities and wider society to promote trust and common understanding.

Community Infrastructure Levy: A levy allowing local authorities to raise funds from owners or developers of land undertaking new building projects in their area.

Comparison Goods Floorspace: Retail floorspace that is used for the sale of one-off, usually non-food, items.

Conservation Area: An area of special architectural or historic interest ~~identified~~ designated by the local authority under the Planning (Listed Buildings & Conservation Areas) Act 1990. There is a statutory duty to preserve or enhance the character or appearance of such areas

Construction Logistics Plan (CLP): a document required at the planning approval stage which addresses all transport and highway issues associated with the construction of a development. It is a live document and can be updated throughout the life of the project, and sets out how a developer proposes to address the impact of site operations associated with the works. This will also include the cumulative impacts of other nearby construction sites where applicable.

Convenience Goods Floorspace: Retail floorspace that is used for the sale of regular purchases, usually food and drink.

Decentralised Energy: Local renewable energy and local low-carbon energy usually but not always on a relatively small scale encompassing a diverse range of technologies.

Detailing: Small elements and features within an overall architectural design or building

Development Plan: The borough's current Development Plan comprises the London Plan (2021), the Local Plan (2018) and the South London Waste Plan (2022). The Development Plan also includes any adopted Neighbourhood Plans.

Development Plan Documents (DPD): Are prepared by the relevant planning authority. They set out the planning policies against which proposals for new development in an area (such as the London Borough of Sutton) will be assessed.

District Centre: A smaller centre, which provides convenience goods and services for local communities, helping to serve day-to-day needs.. The borough's District Centres are Carshalton, Cheam, Hackbridge, North Cheam, Rosehill, Wallington and Worcester Park. For the purposes of dealing with the NPPF's definition of "Main Town Centre Uses", each District Centre is to be classed as a "Town Centre".

Design Summer Year (DSY) files: The Chartered Institution of Building Services Engineers (CIBSE) has developed a range of Design Summer Year (DSY) files, which are used in combination with CIBSE TM52 and TM29 guidelines for assessing overheating in buildings and homes respectively. DSY1 represents a moderately warm summer year. DSY2 represents an intense extreme year, about the same length as a moderate summer year but with higher heat intensity than a moderate summer. DSY3 represents a year with a less intense extreme than the high intensity year but has a longer duration than the moderate summer year.

Employment Land and Economic Needs Assessment (ELENA): is an evidence base document providing data and assessment on employment needs in the area, and an analysis of the amount of available employment land.

Energy Use Intensity: Energy Use Intensity (EUI) is the total amount of energy needed to run a building over a year (per m²) for space heating, hot water, ventilation, lighting, appliances and cooking. The EUI is a reliable indicator of the energy efficiency of a home/building since it takes account of both regulated and unregulated energy use and can be calculated at both design stage and post completion. A new home/building built to current best practice standards of energy efficiency would achieve an EUI of no more than 35 kWh/m² per year.

Established Industrial Areas: Smaller industrial areas designated for protection for industrial uses by the Council.

Independent Examination : Hearings before a Planning Inspector to ascertain whether a Local Plan is “sound” and legally compliant.

Five-Year Housing Land Supply: A document produced by the council to prove it has sufficient deliverable land to meet its housing targets for the next five years.

GLA: The Greater London Authority. The authority, headed by the Mayor of London, has responsibility for strategic planning issues in London.

Green Belt: A designation for land around certain cities and large built up areas, which aims to keep this land permanently open or largely undeveloped.

Green Business: Environmental Goods and Services: Waste management, Waste recovery and recycling, Contaminated land reclamation and remediation, Environmental consultancy and related services, Environmental monitoring, Water and waste water management, Air pollution control and noise and vibration control.

Renewable Energy Technologies: Solar, Biomass, Geothermal, Wave and tidal, Wind energy and Hydro energy.

Low Carbon Technologies: Alternative fuels (inc. nuclear, biomass, ethanol, methane, wood gas and hydrogen) Alternative fuel vehicles (inc. synthetic fuels, bio diesels, hydrogen and electric) Additional energy sources (under development), Building technologies (under development), Carbon finance and New and emerging technologies (inc. smart grids, biotechnology and clean technology).

Green Corridor: Areas of open space which are interlinked and provide opportunities for species migration.

Green Infrastructure: A network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities.

Gypsy and Traveller: Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family’s or dependants’ educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of travelling showpeople or circus people travelling together as such.

Habitats Regulations: Requirement for Local Plans to consider sites protected by the EU directives. There are no EU-designated sites in the borough.

Heritage Asset: A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets (including Schedule Monuments, Listed Buildings, Registered Parks and Gardens and Conservation Areas) and assets identified by the local planning authority (including local listing).

Historic Environment Record: Information services that seek to provide access to comprehensive and dynamic resources relating to the archaeology and historic built environment of a defined geographic area. They are usually held in a database with a digital mapping system. The Greater London Historic Environment Record is the resource for London Boroughs.

Historic Park and Garden: These are heritage assets which may be designated by Historic England as a Registered Park and Garden or designated by the Council for their special historic interest.

House in Multiple Occupation (HMO): A dwelling which contains one or more units of living accommodation, which must be occupied by more than one household who share one or more of the basic amenities (toilet, washing and cooking facilities). Occupiers must occupy the dwelling as their only or main residence and at least one occupier must pay rent.

Housing and Economic Land Availability Assessment (HELAA): An evidence base document to identify potential development sites for housing and economic development.

Housing Density: The number of dwellings per hectare of land. For example:

Aspects, Throwley Way, Sutton	= 545 dwellings/hectare
Dunbar Court, Carshalton Road, Carshalton	= 150 dwellings/hectare
Cromer Mansions, Cheam Road, Sutton	= 100 dwellings/hectare
Browning Avenue, Poet's Estate, Carshalton	= 23 dwellings/hectare

Issues and Options Document: The early production stage of the preparation of Development Plan Documents and involves consultation to meet the requirements of Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

Legible Spaces: The degree to which a place can be easily understood.

LIP (or LIP3): Local Implementation Plan - Sutton's transport plan. The LIP is a statutory requirement under the Greater London Authority Act for all London boroughs to produce, setting out how they intend to deliver the objectives within the Mayors Transport Strategy to 2041. The present LIP from 2019 is the third one to be produced.

Listed Building: A building or structure of special architectural or historic interest included on a statutory list. They are designated by the Secretary of State (for Culture, Media and Sport), advised by Historic England.

Local Centre: A council designation for small areas, usually featuring shops, offices and other economic activity, such as shopping parades.

Local Development Scheme (LDS): Sets out the programme for the preparation of local development documents.

Locally Listed Building: A building or structure of local interest designated by the Council.

Local Housing Needs Assessment (LHNA): An evidence base document to identify the housing need within a specific area. This also provides evidence on affordable housing need.

Local Nature Reserve (LNR): Areas designated by the Council under the National Parks and Access to the Countryside Act 1949. LNRs must have significance for nature conservation and are declared by the LPA (Local Planning Authority). LNRs must include land over which the designating Local Planning Authority has a legal interest i.e. ownership of the freehold, or leasehold liabilities, or land over which the Local Planning Authority has a nature reserve agreement with the landowner. Management is a key aspect of declaring an LNR and a management plan must be put in place which secures the long term maintenance of the features of the area which give it its special interest. Many SINC's within Sutton have also been declared as LNRs and have appropriate management plans in place.

London Plan: The Mayor's Spatial Development Strategy for London. The 2021 London Plan is the current London Plan.

Mayoral Community Infrastructure Levy (MCIL1): Implemented in 2012 to help finance The Elizabeth Line (Crossrail), the major rail link that connects central London to Reading and Heathrow in the West and Shenfield and Abbey Wood in the East.

Mayoral Community Infrastructure Levy (MCIL2): In February 2019 the Mayor adopted a new charging schedule (MCIL2). The new charges took effect on 1 April 2019 and supersedes the MCIL1 charging schedule and the associated Crossrail Funding SPG (applicable in central London, the northern part of the Isle of Dogs and within 1km of a Crossrail station for the rest of London). The MCIL2 charges apply to all planning permissions granted from 1 April 2019 and may also apply to some phased planning permissions granted before 1 April 2019. MCIL will be used to repay Elizabeth Line financing.

Massing: The combined effect of the height, bulk and silhouette of a building or group of buildings.

MTS: The **Mayor's Transport Strategy 2018** sets out his plans to transform London's streets, improve public transport and create opportunities for new homes and jobs. It includes a number of targets and objectives to encourage more people to walk, cycle and

use public transport. All borough plans and transport targets (including the Local Implementation Plan, Sustainable transport Strategy and Climate Emergency Action Plan) will reference the MTS.

Metropolitan Centre: A town centre classified by The Mayor of London as serving wide catchments and typically over 100,000m² of retail, leisure and service floorspace with a significant proportion of comparison goods. Sutton Town centre is the borough's only Metropolitan Centre.

Metropolitan Green Chains: Chain of separate areas of open space which may provide walking and cycling routes.

Metropolitan Open Land (MOL): Strategic open space within the built-up area of London which has similar protection as Green Belt land.

National Planning Policy Framework (NPPF): The Government's statement on planning policy. All Local Plans must be consistent with the NPPF.

Nationally Described Space Standards (NDSS): These are Gross Internal (floor) Area (GIA) of new dwellings at a defined level of occupancy as well as floor areas and dimensions for key parts of the home. Requirements specified in the document should be at a minimum be met and exceeded where possible.

Neighbourhood Forum : Is a group of people who have been established with the express purpose of promoting or improving the social, economic and environmental well being of an area.

Neighbourhood Plan: A plan prepared by a Parish Council or Neighbourhood Forum for a particular neighbourhood area (made under the Localism Act 2011).

Net Zero Carbon (whole life): A building where the sum total of all greenhouse gas emissions over the building's life cycle, both operational and embodied, taking account of offsetting measures, equals zero. This definition of net zero is recommended in the 'Delivering Net Zero' study undertaken by Etude Ltd on behalf of LB Sutton and 18 partner London Boroughs in 2023.

Net Zero Carbon (operational): A building where no fossil fuels are used and where all energy for heating, lighting, ventilation and power is generated from renewable sources either on or off-site. Carbon dioxide (CO₂) emissions arising from the operation of the building, excluding 'unregulated' emissions falling outside the scope of Part L of the Building Regulations and taking account of offsetting measures, are equal to zero. This definition of net zero is used by Policy 31 of Sutton's current Local Plan 2018 and Policy SI 2 of the London Plan 2021.

Open Space: Land that is predominantly undeveloped other than by buildings or structures that are ancillary to the open space use. The definition covers the broad range of types of open space within Sutton, whether in public or private ownership and whether public access is unrestricted, limited or restricted. Includes land designated as open space such

as Metropolitan Open Land, Public Open Space, Urban Green Space and Allotments, and non-designated open spaces.

Permitted Development Rights: Rights which allow developers or landowners to develop, extend or alter buildings or structures without the need for planning permission.

Physical Infrastructure: Including the main utilities of water, sewerage, gas, electricity and telecommunications; transport infrastructure including public transport; and flood defences.

Planning & Compulsory Purchase Act (2004) (as amended): The Act of Parliament that requires the preparation of Local Development Frameworks and Regional Spatial Strategies.

Planning Condition: A condition imposed on a grant of planning permission (in accordance with the Town and Country Planning Act 1990) or a condition included in a Local Development Order or Neighbourhood Development Order.

Planning Obligation: A legally enforceable obligation entered into under section 106 of the Town and Country Planning Act 1990 to mitigate the impacts of a development proposal.

Primary Shopping Area: The Council is proposing to identify a series of Primary Shopping Areas within Sutton Town Centre and the District Centres. The Primary Shopping Areas replace the previous definitions of Primary and Secondary Shopping Frontages..

Primary Shopping Frontage: A run of shops and/or businesses which have been designated by the council as the principal area for retail activity with a town centre.

Private Amenity Space: Space which is attached to a property and is for the sole use of the occupier of the property, for example gardens and balconies.

Proposals Map: A graphical illustration (on an Ordnance Survey base map) of those policies and proposals relating to a specific site or area contained in a Development Plan.

Properties: A building or buildings and the land belonging to it or them. Buildings, or parts of buildings in more central locations may be split into multiple units which include a range of uses.

Public Open Space: A council designation for open space which is open to the general public without any constraints apart from opening hours.

Public Realm: That part of the built environment to which the public has free access, including streets, squares, parks etc. Public realm issues embrace social interaction and the uses of spaces as well as their servicing and management.

Scale: The impression of a building when seen in relation to its surroundings, or the size of parts of a building or its details, particularly as experienced in relation to the size of a person. Sometimes it is the total dimensions of a building which give it its sense of scale: at other times it is the size of the elements and the way they are combined.

Scheduled Monument: A nationally important archaeological or historic site. They are designated by the Secretary of State (for Culture, Media and Sport), advised by Historic England.

Setting: The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.

Sequential Test: Is a methodology for considering where development should be located, with the aim to prioritise the most sustainable locations, first. The sequential test can be used as part of considering impacts on town centres and impacts on matters of flood risk.

Significance: The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic.

Site of Importance for Nature Conservation (SINC): An area of importance for biodiversity. There are three grades: metropolitan importance, borough importance and local importance.

Social and community infrastructure (facilities): This type of infrastructure include facilities such as health provision, including primary care and GP practices, nurseries, schools, colleges, cultural, play, recreation and sports and leisure facilities, public houses, places of worship, fire stations, policing and other criminal justice or community safety facilities and many other uses that contribute to making an area more than just a place to live. Providers of these facilities are in the public, private and voluntary sector.

Soundness: A Local Plan needs to be found sound by a planning inspector. The tests of soundness are:

- Positively prepared: *the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development*
- Justified: *The plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence*
- Effective: *The plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and*
- Consistent with national policy: *The plan should enable the delivery of sustainable development in accordance with the policies in the NPPF.*

Source Protection Zone (SPZ): Groundwater Source Protection Zones (SPZs) are defined by the Environment Agency (EA) in order to show the level of risk to the groundwater water source (wells, boreholes and springs) from contamination. Contamination could arise from any activity that might cause pollution in the area. For example, storing pollutants like petrol underground, soakaways from septic tanks to the ground. The closer the activity, the greater the risk. There are three main zones: Inner (SPZ1), Outer (SPZ2) and total catchment (SPZ3).

Space heating demand: Space heating demand is the total amount of heat energy needed to heat a building over a year per m². A range of design specifications can help to drive down space heating demand including building form and orientation, insulation, air-tightness, windows and doors and the type of ventilation system. The Climate Change Committee recommends a space heating demand of less than 15-20 kWh/m² of gross internal floorspace (GIA) per year for new homes.

Statement of Community Involvement (SCI): Sets out the standards which the planning authority intends to achieve in relation to involving the community in the preparation, alteration and continuing review of all Local Development Documents and in significant development control decisions. It also sets out how the local authority intends to achieve those standards. The Statement of Community Involvement is not a Development Plan Document but is subject to independent examination.

Strategic Environmental Assessment (SEA)/Sustainability Appraisal (SA): A generic term used to describe environmental assessment as applied to policies, plans and programmes. The European 'SEA Directive' (2001/42/EC) does not in fact use the term strategic environmental assessment. It requires a formal 'environmental assessment' of certain plans and programmes, including those in the field of planning and land use. The Sustainability Appraisal covers wider objectives than the Strategic Environmental Assessment but in practice both procedures will be combined. These processes feed into and are intended to improve the content of the LDF.

Strategic Flood Risk Assessment (SFRA): Provides information on flood risk. The SFRA identifies constraints which will assist in the formulation of planning policies, it aids the identification of the development potential of proposed sites and aids in assessing future development proposals. In the case of Sutton, the assessment is in partnership with the boroughs of Wandsworth, Merton and Croydon.

Strategic Housing Land Availability Assessment (SHLAA): An evidence base document to identify potential development sites for housing and economic development. The SHLAA referenced is in relation to the London-wide document produced in 2017. The Council has produced a Housing and Economic Land Availability Assessment to support the Local Plan Review.

Strategic Industrial Locations (SILs): These are preferred Industrial Locations and exist to ensure London provides sufficient quality sites in appropriate locations to meet the growth of business, industrial and warehousing sectors.

Suburban Heartlands: A council designation which describes housing areas outside town centres, the areas of potential intensification, industrial areas and areas within open space designations.

Supplementary Planning Documents (SPD): Cover a wide range of issues on which the local authority wishes to provide policy guidance to supplement the policies and proposals in Development Plan Documents. They are not subject to independent examination.

Sustainable Transport Strategy (STS): The Strategy is designed to create opportunities for residents to travel safely, actively and healthily around the borough, improve access to

walking, cycling and public transport, improve air quality and safety, and to support Sutton's growth. The Strategy has the status of a Supplementary Planning Document. It contains planning guidance on car clubs, transport assessments, travel plans, construction logistics plans, freight servicing plans and parking management plans.

TA: Transport Assessments - and **TS - Transport Statements** - Are ways of assessing the potential transport impacts of developments, and may propose mitigation measures to promote sustainable development. They are required to be provided at the planning stage of a development. Transport Assessments are thorough assessments of the transport implications of development and tend to be required for larger schemes with high levels of freight, servicing or trip generation. Transport Statements are a 'lighter-touch' evaluation to be used where this would be more proportionate to the potential lower impact of the development.

Taller Building Categories:

- Mid-rise Buildings – those that are considered to be tall in the context of relatively low-rise development but that in absolute terms are in the region of 4-5 storeys (12-18m);
- Tall Buildings – those that are significantly taller than the mean height of surrounding development and will have a range of 6-10 storeys (18-30m);
- Very Tall Buildings – those that are excessively taller than the surrounding built form and will be from 10 storeys upwards (30m+).

Town Centres: A general description which covers the Metropolitan Centre (Sutton Town Centres) and the seven District Centres.

Town Centre Uses: Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment facilities, and the more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling centres, and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).

Urban Green Space: A Council designation for open space which is only open to certain sections of the public, such as sports clubs.

Use Classes Order: The classes of use for England are set out in the Town and Country Planning (Use Classes) Order 1987 and its subsequent amendments.

Unregulated Emissions: Unregulated emissions include those not accounted for under Part L of the Building Regulations such as those from cooking and appliances.

Wandle Valley Regional Park: Areas designated by the London Boroughs of Croydon, Merton, Sutton and Wandsworth to promote public access, biodiversity improvements and heritage protection along the River Wandle.

Windfall: A development which is permitted and/or built but which was not identified in the council's planning documents.

Use Classes Order

B2: General Industrial	Use for industrial process other than one falling within uses described in Class E
B8: Storage and Distribution	Use for storage or as a distribution centre.
C1: Hotels	Hotels, boarding of guest houses (where in each case no significant element of care is being provided).
C2: Residential Institutions	Residential care homes, hospitals, nursing homes, boarding schools, residential colleges and training centres.
C2a: Secure Residential Institutions	Including use as prisons, young offenders institutions, detention centres, secure training centres, custody centres, short term holding centres, secure hospitals, secure local authority accommodation or use as a military barracks.
C3: Dwelling Houses	<p>This class is formed of 3 parts:</p> <p>C3(a) covers use by a single person or a family (a couple whether married or not, a person related to one another with members of the family of one of the couple to be treated as members of the family of the other), an employer and certain domestic employees (such as an au pair, nanny, nurse, governess, servant, chauffeur, gardener, secretary and personal assistant), a carer and the person receiving the care and a foster parent and foster child.</p> <p>C3(b): up to six people living together as a single household and receiving care e.g. supported housing schemes such as those for people with learning disabilities or mental health problems.</p> <p>C3(c) allows for groups of people (up to six) living together as a single household. This allows for those groupings that do not fall within the C4 HMO definition, but which fell within the previous C3 use class, to be provided for i.e. a small religious community may fall into this section as could a homeowner who is living with a lodger</p>
C4: Houses in Multiple Occupation	Small shared houses occupied by between three and six unrelated individuals, as their only or main residence, who share basic amenities such as a kitchen or bathroom.
E: Commercial, Business and Service	<p>Use, or part use, for all or any of the following purposes</p> <p>(a) Display or retail sale of goods, other than hot food, principally to visiting members of the public,</p> <p>(b) Sale of food and drink principally to visiting members of the public where consumption of that food and drink is mostly undertaken on the premises,</p> <p>(c) Provision of the following kinds of services principally to visiting members of the public:</p> <p>(i) financial services,</p> <p>(ii) professional services (other than health or medical services), or (iii) any other services which it is appropriate to provide in a commercial, business or service locality,</p> <p>(d) for indoor sports, recreation or fitness, not involving motorised vehicles or firearms, principally to visiting members of the public,</p> <p>(e) for the provision of medical or health services, principally to visiting members of the public, except the use of premises attached to the residence of the consultant or practitioner,</p> <p>(f) for a crèche, day nurseries or day centres, not including a residential uses, principally to visiting members of the public,</p> <p>(g) for:</p> <p>(i) an office to carry out any operational or administrative functions,</p> <p>(ii) the research and development of products or processes, or (iii) any industrial process, being a use, which can be carried out in any residential area without detriment to the amenity of that area by reason of noise, vibration, smell, fumes, smoke, soot, ash, dust or grit.</p>

F1: Learning and Non-residential institutions	<p>Any use not including residential use</p> <p>(a) For the provision of education</p> <p>(b) For the display of artworks (not for sale or hire)</p> <p>(c) As a museums</p> <p>(d) As a public libraries or public reading rooms</p> <p>(e) As a public halls or exhibition halls</p> <p>(f) For, or in connection with, public worship or religious instructions</p> <p>(g) As a law courts.</p>
F2: Local Community Uses	<p>Local Community Uses</p> <p>(a) A shop mostly selling essential goods, including food. To visiting members of the public in circumstances where:</p> <p>(i) the shop's premises cover an area not more, than 280 square metres,</p> <p>(ii) where there is no other such facility within 1000 metre radius of the shop's location,</p> <p>(b) Halls and meeting places for the principal use of the local community,</p> <p>(c) Outdoor sports or recreation (not involving motorised vehicles or firearms)</p> <p>(d) Swimming pools or ice skating rinks.</p>
SG: Sui Generis	<p>Certain uses do not fall within any use class and are considered 'sui generis'. Such uses include: betting offices/shops, pay day loan shops, theatres, cinemas, live music establishments, concert halls, nightclubs, dance halls, public houses, wine bars or drinking establishments, hot food takeaways, houses in multiple occupation, hostels providing no significant element of care, scrap yards, yards for the storage or distribution of materials, any work registrable under the Alkali etc. works Regulation Act 1906, petrol filling stations and shops selling and/or displaying motor vehicles, waste disposal installations, retail warehouse clubs, launderettes, taxi businesses, businesses for the hire of motor vehicles, amusement centres, funfairs and casinos.</p>

Abbreviations

AEP	Annual Exceedance Probability
AMR	Authority Monitoring Report
API	Area of Potential Intensification
BBP	Better Buildings Partnership
BNG	Biodiversity Net Gain
CCC	Climate Change Committee
CIBSE	Chartered Institution of Building Services Engineers
CIL	Community Infrastructure Levy
CHP	Combined Heat and Power
DEFRA	Department for Environment, Food and Rural Affairs
DER	Dwelling Emission Rate
DfT	Department for Transport
DNZ	Delivering Net Zero
DPER	Dwelling Primary Energy Rate
DtC	Duty to Cooperate
DSY	Design Summer Year
EA	Environment Agency
ELENA	Employment Land and Economic Needs Assessment
EUI	Energy Use Intensity
FHSF	Future High Streets Fund
GHA	Good Homes Alliance
GiGL	Greenspace Information for Greater London
GLA	Greater London Authority
LCH	London Cancer Hub

LETI	Low Energy Transformation Initiative
LHNA	Strategic Housing Market and Local Housing Needs Assessment
LLFA	Lead Local Flood Authority
LPG	London Plan Guidance
LSOA	Lower layer Super Output Area
MOL	Metropolitan Open Land
NCM	National Calculation Methodology
NDSS	Nationally Described Space Standards
NPPF	National Planning Policy Framework
NZCBS	Net Zero Carbon Building Standards
PHPP	Passive House Planning Package
PPG	Planning Practice Guidance
PTAL	Public Transport Access Level
RIBA	Royal Institute of British Architects
SA	Sustainability Appraisal
SAP	Standard Assessment Procedure
SECH	Specialist Emergency Care Hospital
SFRA	Strategic Flood Risk Assessment
SHELAA	Strategic Housing and Employment Land Availability Assessment
SHLAA	Strategic Housing Land Availability Assessment
SIL	Strategic Industrial Location
SINC	Site of Importance for Nature Conservation
SPD	Supplementary Planning Document
SPG	Supplementary Planning Guidance
SPZ	Source Protection Zone (groundwater)

SuDS	Sustainable Drainage Systems
SWMP	Surface Water Management Plan
TCPA	Town and Country Planning Association
TCRNA	Town Centres and Retail Needs Assessment
TER	Target Emissions Rate
TfL	Transport for London
TPER	Target Primary Energy Rate
UKGBC	UK Green Building Council
ULEZ	Ultra-Low Emission Zone
WLCN	Whole Life Carbon Network



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