



London Borough of Sutton  
Local Plan

# Equalities Impact Assessment (EqIA) on Issues & Preferred Options (Regulation 18 consultation)

July 2024



# **Sutton Local Plan Equalities Impact Assessment (EqIA) on Issues & Preferred Options (Regulation 18 consultation)**

**Strategic Planning  
Environment and Planning Division  
London Borough of Sutton  
July 2024**

# Representation Arrangements

1. The period for making representations on this Equalities Impact Assessment (EqIA) Report is six weeks, from 25 July to 12 September 2024 **All comments must be received by 17:00 on Thursday 12 September 2024** .
2. **The Council encourages responses to be made electronically.** Representations should be e-mailed to [planningpolicy@sutton.gov.uk](mailto:planningpolicy@sutton.gov.uk) or [patrick.whitter@sutton.gov.uk](mailto:patrick.whitter@sutton.gov.uk)
3. However, if you do not have Internet access, representations can be made by letter and sent to:  
  
Patrick Whitter,  
Strategic Planning Team,  
Environment and Planning Division,  
London Borough of Sutton,  
Civic Offices, St Nicholas Way,  
Sutton, SM1 1EA
4. If you wish to discuss any issues raised in this document or any of the arrangements to enable representations, please contact the Strategic Planning Team on 020 8770 5000.
5. In dealing with representations the Council will:
  - (i) Acknowledge all responses made;
  - (ii) Summarise the main issues raised. This report will be made publicly available on the Council's website <http://www.sutton.gov.uk> and in local libraries;
  - (iii) Send a copy of all representations to the Secretary of State and make it available on the Council's website and in local libraries; and
  - (iv) Send you a letter telling you when the document has been submitted for independent inspection (only if you have requested this).
6. The London Borough of Sutton handles personal data in accordance with the Data Protection Act 1998. Please be aware that by providing your contact details you are consenting to your data being used in this way.
7. If you want independent help and advice on this submission document or any other planning matter you can contact Planning Aid for London on Tel: 020 7247 4900 or by emailing [info@planningaidforlondon.org.uk](mailto:info@planningaidforlondon.org.uk)
8. Useful general information on the planning system can be found on the Planning Portal <http://www.planningportal.co.uk> <https://www.planningportal.co.uk/> which is managed by the Government's Planning Inspectorate.

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# 1. INTRODUCTION

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## WHAT IS AN EQIA?

1.1 An EqIA is defined by the Equality and Human Rights Commission<sup>1</sup> as “a tool that helps public authorities make sure their policies, and the ways they carry out their functions, do what they are intended to do for everybody”. EqIAs help local authorities to identify potential sources of discrimination against specific equalities groups arising from their policies or operations and take appropriate steps to address them. This can also highlight opportunities to promote equalities and make a positive contribution to improving quality of life for local communities. An EqIA should not be an afterthought and should inform policy preparation from the earliest stages of plan making.

1.2 EqIAs have their origin in the Macpherson Enquiry into the Metropolitan Police and the subsequent Race Relations Act 2000. Further legislation extended the scope of EqIAs to address disability and gender equalities alongside racial discrimination issues. Although the subsequent Equality Act 2010 (see below) removed the formal requirement for public bodies in England to undertake or publish a detailed EqIA of their policies, practices and decisions (including joint development plan documents) from April 2011, local authorities still have a legal duty to “give due regard” to the need to avoid discrimination and promote equality of opportunity for all protected groups when making policy decisions and to publish information showing how they are complying.

## LEGISLATION

1.3 The requirement to consider the impacts of policies and strategies upon certain equality target groups through EqIA process arises from the following legislation.

### **Race Relations (Amendment) Act 2000**

1.4 This amendment required local authorities to be pro-active in promoting racial equality by undertaking a Race Equality Impact Assessment of their strategies and plans.

### **Disability Discrimination (Amendment) Act 2005**

1.5 The Act required local authorities to promote equality of opportunity for disabled people by ensuring that their policies, practices, procedures and services do not discriminate against them.

### **Equality Act 2006**

1.6 The Act established the Commission for Equality and Human Rights (CEHR) which came into force in October 2007. It brought together as one organisation the CRE, Disability Rights Commission (DRC) and Equal Opportunities Commission (EOC).

### **Gender Equality Duty 2007 (as required by the Equality Act 2006)**

1.7 This came into effect in April 2007 and is aimed at public authorities to eliminate unlawful discrimination and harassment and promote gender equality. There is a requirement to produce and publish a gender equality scheme. As part of this, the authorities must assess the impact of their existing and future policies and practices on gender equality as well as consult stakeholders with a scheme review every 3 years.

### **Equality Act 2010**

1.8 The Equality Act 2010 brought together over 116 separate pieces of legislation into one single Act. Combined, they make up a new Act that provides a legal framework to protect the rights of individuals and advance equality of opportunity for all. The Act simplifies, strengthens and harmonises the previously existing legislation in order to protect individuals from unfair treatment and promotes a fair and more equal society. The main pieces of legislation that have merged are:

- Sex Discrimination Act 1975;
- Race Relations Act 1976;
- Disability Discrimination Act 1995;
- Employment Equality (Religion or Belief) Regulations 2003;

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<sup>1</sup> see <http://www.equalityhumanrights.com>

- Employment Equality (Age) Regulations 2006;
- Equality Act 2006, Part 2; and
- Equality Act (Sexual Orientation) Regulations 2007.

**1.9** Section 149 of the Act introduces a 'general duty' on all public sector bodies to have regard to the following considerations in the exercise of their functions:

- eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act;
- advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it; and
- foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

**1.10** In seeking to tackle prejudice, promote understanding and advance equality of opportunity for persons who share a relevant 'protected characteristic', public bodies should have regard to:

- removing or minimising disadvantages suffered by persons who share a relevant protected characteristic that are connected to that characteristic;
- taking steps to meet the needs of persons who share a relevant protected characteristic that are different from the needs of persons who do not share it;
- encouraging persons who share a relevant protected characteristic to participate in public life or in any other activity in which participation by such persons is disproportionately low.

**1.11** The relevant protected characteristics are age; disability; gender reassignment; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.

## **SUTTON EQUALITY, DIVERSITY & INCLUSION FRAMEWORK 2023-27**

**1.12** 'Ambitious for Sutton 2022-2027', includes a specific commitment that by 2027, Sutton will be a place where people from all backgrounds feel included and get on well together, with support for our young people, families, older people, and vulnerable residents. Sutton's Equality, Diversity & Inclusion Framework 2023-27<sup>2</sup> sets out the Council's commitment and approach to upholding its legal duties and leading on equality, diversity and inclusion. The following Core Priorities for equality, diversity and inclusion are set for the next four years:

- (1) Reducing disadvantages for people who have care experience; we will achieve this by embedding 'care experience' as a local protected characteristic; working across the organisation and with partners to create more opportunities for people who have experienced care to overcome the disadvantages they may face;
- (2) Focusing on disadvantages linked to household income; we will consider the socio-economic duty as part of decision making. We will work with partners to target support to help mitigate the impacts of the rising cost of living, and aim to reduce disadvantages faced by lower income households;
- (3) Better understanding our diverse communities through data insights and community engagement; We will work with partners to draw upon available data about Sutton's demographics to make evidence based decisions and target our resources effectively. We will work closely with voluntary and community groups to ensure that we are speaking with residents from a wide range of backgrounds to continually improve our services and ensure more residents are engaged in plans for the future of the borough; and
- (4) Empower Leading the way as a welcoming workplace; we will deliver a workforce equality, diversity and inclusion plan which supports staff from all backgrounds to feel comfortable to be themselves and ensure our workforce reflects the diversity of Sutton as a place. We have won national EDI awards (Municipal Journal 2022, Public Sector People Managers Association 2023, Race Equality Matters Silver Trailblazer 2023). We will continue to test ourselves against other organisations to understand how we can improve and develop our approach.

<sup>2</sup> Sutton's Equality, Diversity & Inclusion Framework 2023-27 is available at <https://www.sutton.gov.uk/documents/20124/219882/LBS+Equality+%2C+Diversity+%26+Inclusion+Framework+2023-2027.pdf>

## **PURPOSE OF EqlA REPORT ON LOCAL PLAN ISSUES & PREFERRED OPTIONS (THIS DOCUMENT)**

**1.13** The purpose of this EqlA Report is to inform public consultation on the Local Plan Issues & Preferred Options (Regulation 18 consultation) document by assessing the likely impacts of emerging draft policies and alternative options on each of the equalities target groups. It has been published for public consultation alongside the Issues & Preferred Options document and the Sustainability Appraisal (SA) Report for approval at the Council's Housing, Environment and Business (HEB) Committee on 17 July 2024 prior to Regulation 18 consultation between 25 July and 12 September 2024.

**1.14** This report is divided into the following sections:

- **Section 1: Introduction;**
- **Section 2: Background to Sutton Local Plan Issues and Preferred Options (Regulation 18) document;**
- **Section 3: Equalities Target Groups in LB Sutton;**
- **Section 4: Equalities Impact Assessment (EqlA); and**
- **Section 5: Conclusions and Next Steps.**

## **CONSULTATION ARRANGEMENTS**

**1.15** Following approval at HEB Committee on 17 July 2024, this EqlA Report has been published for public consultation alongside the Local Plan Issues & Preferred Options (Regulation 18 consultation) document for a period of 7 weeks from Thursday 25 July to Thursday 12 September 2024. In line with Sutton's adopted Statement of Community Involvement (SCI)<sup>3</sup>, this EqlA Report can be viewed or downloaded on the Council's website at <http://www.sutton.gov.uk> and copies have been made available for inspection at the following locations:

- Civic Offices, St Nicholas Way, Sutton;
- all public libraries within the Borough.

**1.16** A series of consultation workshops has been arranged for the following Local Committees during July and August 2024: Beddington and Wallington; Carshalton and Clockhouse; North Cheam, Stonecot and Worcester Park; Hackbridge, St Helier and the Wrythe; Sutton Local; and Sutton South, Cheam and Belmont, together with a presentation to the Sutton Community Environmental Champions group.

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<sup>3</sup> Sutton's adopted Statement of Community Involvement (SCI) (Dec 2019) is available at [https://drive.google.com/file/d/1bODFqsgdm\\_C6dN6SopgDFbliiAXSzmtD/view](https://drive.google.com/file/d/1bODFqsgdm_C6dN6SopgDFbliiAXSzmtD/view)





## 2. BACKGROUND TO DRAFT LOCAL PLAN ISSUES AND PREFERRED OPTIONS (REGULATION 18) DOCUMENT

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### LOCAL PLAN

**2.1** The development plan lies at the heart of the planning system. Its purpose is to set out a Vision and a framework for the future development of the area by addressing needs and opportunities in relation to housing provision, the local economy, community facilities and infrastructure, conserving and enhancing the natural and historic environment, mitigating and adapting to climate change, and achieving well designed places. In order to be effective and deliverable, it is essential that development plans are in place and kept up to date. Under the Planning and Compulsory Purchase Act 2004 as amended, the Council has a statutory duty to prepare, monitor and review the current development plan for the Borough, namely Sutton's Local Plan adopted in February 2018. Local plans must be positively prepared, justified, effective and consistent with the Government's National Planning Policy Framework (NPPF)<sup>3</sup>.

**2.2** Local Plans must set out what is intended to happen in the area over the plan period, where and when this will occur and how it will be delivered. This should be done by identifying broad locations for regeneration and growth and specific allocations of land for different uses; through designations showing areas where particular opportunities or environmental constraints apply (such as areas at risk from flooding or protected habitats); and through criteria-based policies to be taken into account when considering development. The Government's Planning Practice Guidance<sup>4</sup> emphasises that Local Plans should concentrate on the critical issues facing the area and the strategy and opportunities for addressing them, paying careful attention to both deliverability and viability. Local Plans must be supported by an updated Policies Map showing the spatial application of policies and key planning designations across the Borough.

**2.3** The NPPF (Paras 10 and 11) states that Local Plans should be based upon and reflect the 'presumption in favour of sustainable development', with clear policies guiding how this presumption should be applied locally. This means that:

- all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects; and
- strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas.

**2.4** As well as meeting the requirements of national planning policy, a new Local Plan is also needed to ensure that Sutton's local development framework is in general conformity with the London Plan<sup>5</sup> and helps to deliver the Council's long-term aspirations for the future of the Borough set out Sutton's Corporate Plan 2022-27<sup>6</sup>; Sutton's Environment Strategy and Climate Emergency Response Plan 2021<sup>7</sup>; Sutton's Economic Development Strategy<sup>8</sup>; Sutton's Housing Strategy; Borough Sustainable Transport Strategy and a range of other Council programmes and initiatives. Key strategic priorities include meeting Borough housing targets; increasing the supply of affordable homes by building new Council houses and estate regeneration; developing a pathway for reducing Borough-wide carbon emissions towards the longer term goal of zero carbon; major regeneration schemes at Sutton Town Centre and the London Cancer Hub; enabling people to make sustainable and active transport choices in line with 'Healthy Streets' principles and Biodiversity Net Gain (BNG).

**2.5** The Council therefore intends to prepare a new Local Plan together with an updated Policies Map to guide the future growth and development of the Borough over the next 10-15 years from 2024-41. When adopted, Sutton's new Local Plan will replace the existing Local Plan 2018<sup>9</sup> (but not the South London Waste Plan DPD).. It can be seen from Sutton's adopted local development scheme (LDS), approved in July 2021, LDS that the initial stage of Local Plan evidence gathering got underway in Spring 2022 with final adoption of the Plan scheduled for 2026.

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<sup>3</sup> the updated NPPF (DLUCG, December) is available at <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

<sup>4</sup> the Government's Planning Practice Guidance (DLUCG/ MHCLG, Feb 2024) is available at <https://www.gov.uk/government/collections/planning-practice-guidance>

<sup>5</sup> the New London Plan 2021 is available at <https://www.london.gov.uk/programmes-strategies/planning/london-plan/new-london-plan/london-plan-2021>

<sup>6</sup> Sutton's Corporate Plan 2022-27 'Ambitious for Sutton' is available at <https://www.sutton.gov.uk/ambitiousforsutton>

<sup>7</sup> Sutton's Environment Strategy and Climate Emergency Response Plan 2021 is available at <https://www.sutton.gov.uk/-/sutton-climate-and-ecological-emergency>

## KEY CHALLENGES

**2.6** Based upon prevailing socio-demographic, developmental and environmental trends affecting the Borough; the national and sub-regional policy context, key sustainability issues identified previously in the SA Scoping Report and Borough studies undertaken as part of the Local Plan evidence base, the following key challenges have been identified that the Local Plan should address:

- 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?
- 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?
- 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?
- 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?
- How to meet Sutton's sustainable transport needs and other infrastructure requirements of the borough.
- 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?
- What are the potential sources of discrimination against specific equalities groups which might arise from the policies and proposals of the new Local Plan and what steps can be taken to address them. How can the Local Plan make a positive contribution to the equalities objectives underlying Sutton's Equality, Diversity & Inclusion Framework 2023-27, promote climate justice and improve quality of life for local communities?

## IDENTIFICATION OF ISSUES, PREFERRED OPTIONS AND DRAFT POLICIES

**2.7** The Local Plan 'Issues and Preferred Options' (Regulation 18) document identifies 57 distinct Local Plan Issues. For those issues with longer term strategic or Borough-wide implications, such as the overall number of new dwellings or amount of commercial floorspace to be accommodated within the Borough over the Plan period and where this growth should be located, a range of alternative options are put forward. In some cases, the Council has highlighted a 'preferred option' where this is strongly supported by the available evidence or existing Council priorities.

**2.8** For other 'less strategic' areas of emerging Local Plan policy, where updated development management criteria need to be developed as the basis for determining individual planning applications, draft policies are put forward.

**2.9** The EqIA matrix in Section 4 incorporates a summary of each policy option and draft policy.

### 3. EQUALITIES TARGET GROUPS

#### EQUALITIES TARGET GROUPS

3.1 Table 3.1 identifies the range of equality target groups considered in this EqIA report.

**Table 3.1: Equalities Target Groups**

Equality Target Group	Equality Target Strand
Women	Gender
Asian, Black, Mixed/ Multiple and White non-British ethnic background	Race
Older people	Age
Young people and children	Age
Disabled people	Disability
Lesbian, gay, bisexual and transgender people	Sexuality
Different faith groups	Faith
People affected by social deprivation	Social Deprivation

#### SUTTON'S POPULATION

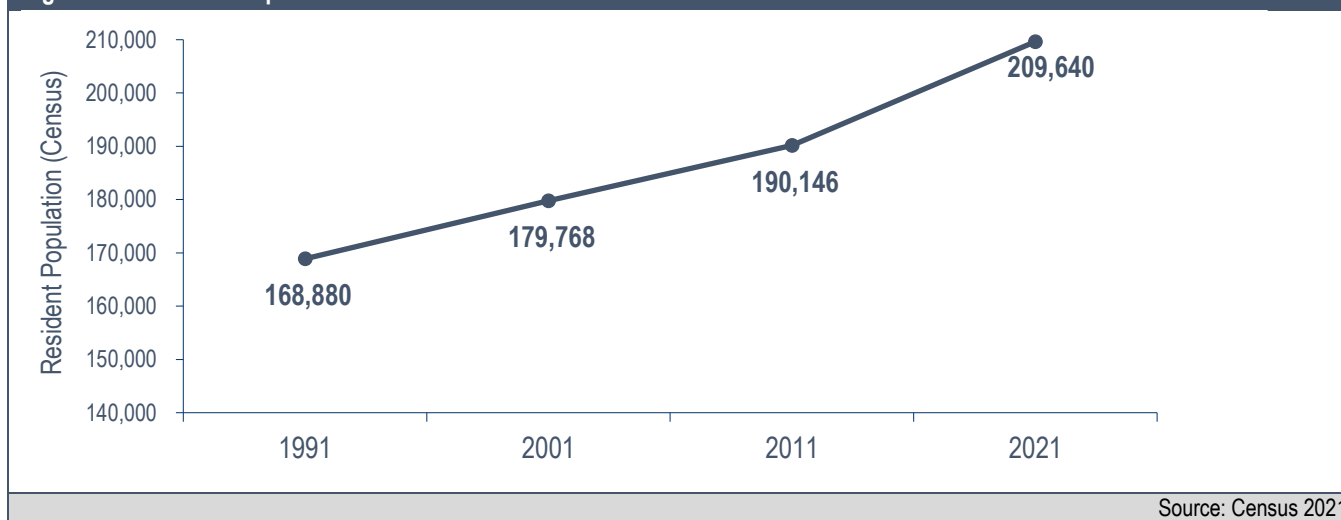
3.2 Table 3.2 shows that the total resident population of the Borough increased from 190,146 in 2011 to 209,640 in 2021 - an increase of +19,494 or +10.3% .

**Table 3.2: Borough Population – Census 2021**

Indicator	Census 1991	Census 2001	Census 2011	CENSUS 2021 (21 March 2021)
<b>Resident population</b>	168,880	179,768	190,146	<b>209,640</b>
<i>Males</i>	-	86,878	92,443	101,483
<i>Females</i>	-	92,890	97,703	108,156
<b>10-yr change</b>	-	+ 10,888 (+ 6.4%)	+ 10,378 (+ 5.8%)	<b>+19,494 (+10.3%)</b>

Source: Census 2021<sup>8</sup>

**Figure 3.1: Resident Population in LB Sutton 1991 to 2021 – Census 2021**



<sup>8</sup> Census 2021 <https://census.gov.uk/>

## POPULATION STRUCTURE - GENDER

3.3 Table 3.3 shows the proportion of males and females making up the Borough population based on ONS Mid-Year Estimates for 2021 (released in December 2022).

**Table 3.3: Male and Female Population of LB Sutton – ONS Mid-Year Estimates**

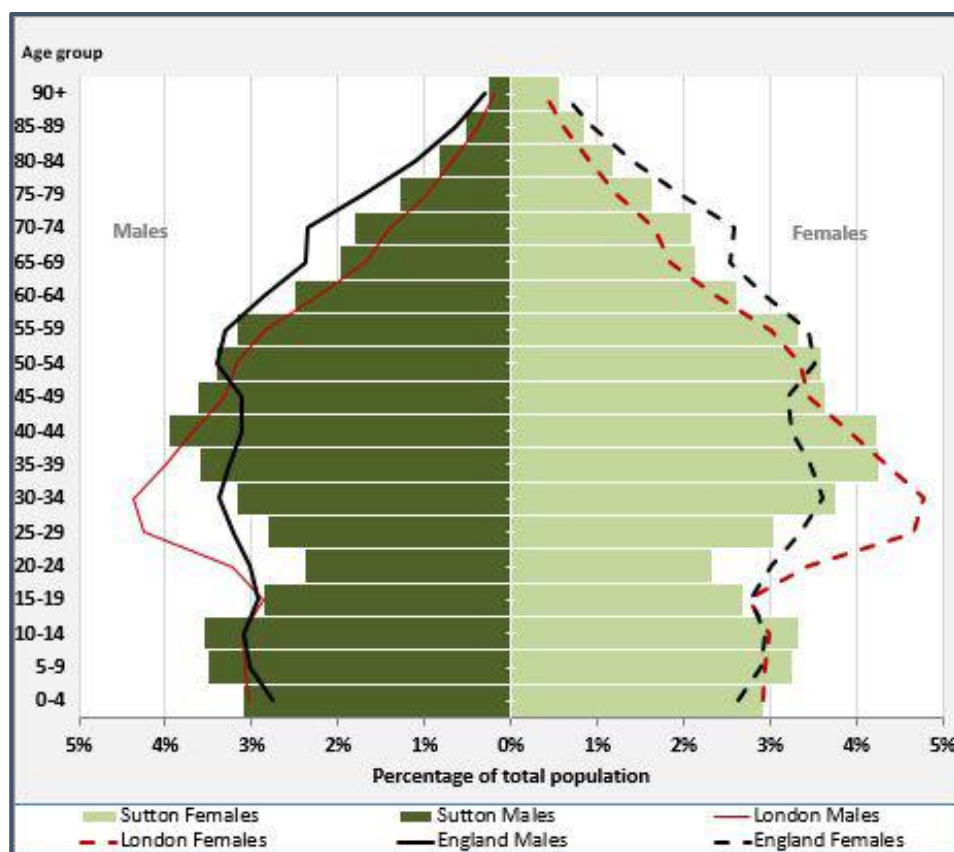
Indicator	ONS Mid-Year Estimate 30 June 2018 (released in 2019)	ONS Mid-Year Estimate 30 June 2019 (released in 2020)	ONS Mid-Year Estimate 30 June 2020 (released in 2021)	ONS Mid-Year Estimate 30 June 2021 (released Dec 2022)
<b>Resident population</b>	204,525	206,349	<b>207,707</b>	<b>209,517</b>
<i>Males</i>	99,777	100,776	101,319	101,461
<i>Females</i>	104,748	105,573	106,388	108,056
Year on year change	-	+1,824 (+0.9%)	<b>+1,358 (+0.7%)</b>	<b>+ 1,810 (0.9%)</b>

Source: ONS Mid-Year Estimates 2021 (December 2022)<sup>9</sup>

## POPULATION STRUCTURE - AGE GROUPS

3.4 Figure 3.2 shows the population structure of LB Sutton compared to London and England as mid-2021. In LB Sutton:

**Figure 3.2: Population structure of LB Sutton compared to London and England 2021**



Source: ONS Mid-Year Estimates 2021 (December 2022)

## CHILDREN AND YOUNG PEOPLE

3.5 The key Borough trends in relation to children and young people are as follows:

- there are relatively more children aged 0-14 years in LB Sutton compared to the London and England populations;
- there are also relatively more adults in LB Sutton aged 35-49 years compared to England;
- the adult population is older compared to the London population, with a higher proportion of people aged over 40 years old living in Sutton. The median age in Sutton is 39.6 (compared to 35.9 in London, and 40.7 across England) - this is an increase of about 1 year in the last decade. The median age in Sutton is the 4th highest in London;

<sup>9</sup> ONS Mid-Year Estimates for 2021 published December 2022

- a higher proportion of LB Sutton’s population are under the age of 18 than the London and England average. Growth amongst school-aged children has been particularly high over the last decade 23.4% of Sutton’s population are under 18 (48,972 people), compared to 21.5% in London and 20.8% in England;
- 6.0% (12,607 children) are under 5, comparable to 6.0% in London and 5.4% in England;
- 17.4% (36,365 children) are aged 5-17 (compared to 15.5% in London and 15.4% in England). In the last decade, the population of under 15s in Sutton has increased by 15.6%, which is more than the London (3.4%) and England (4.6%) 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
- In the most recent 6-year period (from 2015 to 2020), Sutton experienced the second largest net inflow of children (aged up to 15 years old) of all London boroughs<sup>3</sup>. Over the next decade, 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; and
- population models suggest that (i) There will likely be a 5.2% decline in the number of children aged 0-4 between 2023 and 2028 (ii) The biggest reduction in population across all age groups by 2028 is expected to be amongst children aged 5-10 (-14.4%). The number of children aged 11-17 is projected to decline at a slower rate over the same time period (-0.1%)

## OLDER PEOPLE

3.6 The key Borough trends in relation to older people are as follows:

- adults aged 65 and over make up 15.2% of the population (31,864 people), compared to 11.9% in London and 18.5% in England
- LB Sutton has an older population than the regional average. Over the last decade, the population of over 65s has increased by 16.8%. This age group has grown faster than the average rate of population growth across all age groups in Sutton over the same time period, but the rate of growth is below the national increase amongst this age group (19.9%).
- the lower rate of growth amongst older age groups in Sutton (compared to London and England) is likely a result of migration out of the borough that continues beyond working age, particularly amongst adults aged 65-693. This is likely the reason the population is not ageing as rapidly as seen across England on average.
- despite this, projections show over 65s will be the fastest-growing age group in Sutton over the next decade. In the medium term, over the next five years, the highest growth is expected to be amongst adults aged 65-84 (10.3% increase), with a lower increase amongst adults aged 85+ (5.0%). Between 2027 and 2032, projections show the ageing of the population will accelerate, particularly amongst adults aged 85+, with a 23.8% increase in population projected for this age group.
- age is a risk factor for long term conditions and disability which are likely to increase demand for health and care services. There will likely also be an increase in demand for services and housing options that allow individuals to remain independent at home. The number of adults aged 65-84 are forecast to increase by 18.1% from 2027 to 2032.

## ETHNICITY

3.7 Table 3.4 shows how the ethnic composition of the Borough has changed from the 2011 Census to the 2021 Census

**Table 3.4: Change in ethnic breakdown of LB Sutton population from 2011 to 2021**

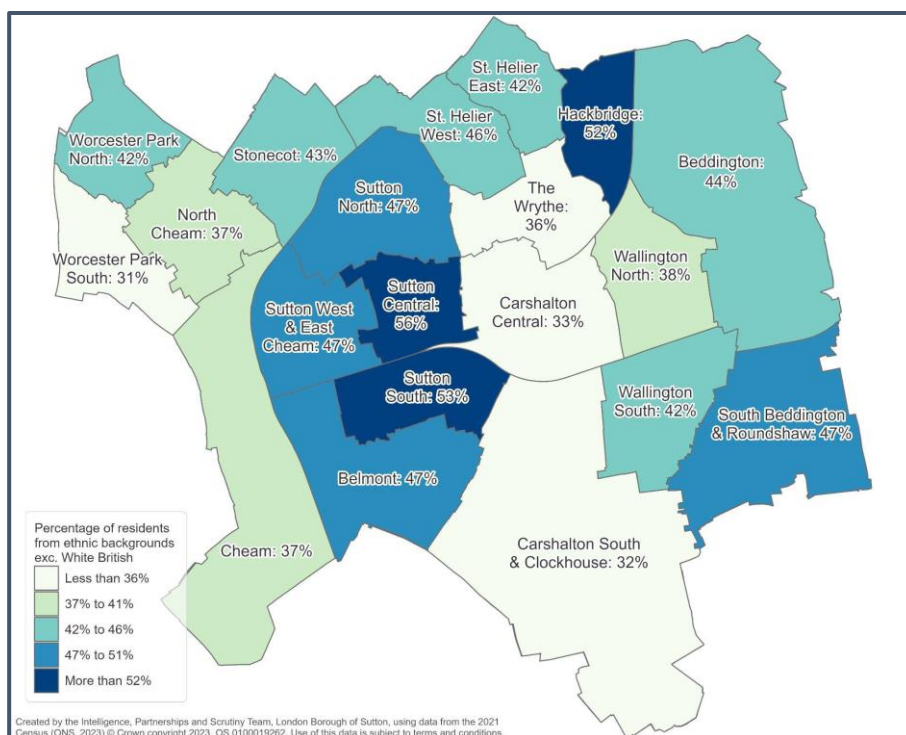
Indicator	Census 2011		Census 2021	
	Number	%	Number	Proportion (%)
Borough Residents: White	157,593	82.9%	143,145	68.3%
Black and Minority Ethnic (BAME)	32,507	17.1%	66,491	31.7%
<i>Asian or Mixed Race (incl.Chinese)</i>	17,299	9.1%	39,855	19.0%
<i>Black or Mixed Race</i>	10,646	5.6%	16,510	7.9%
<i>Other</i>	5,893	3.1%	10,126	4.8%



3.8 The key Borough trends in relation to ethnicity are as follows:

- LB Sutton has become more ethnically diverse in the last decade. In 2021, 43% of the population were from Asian, Black, Mixed/ Multiple and White non-British ethnic backgrounds (with 32% from Asian, Black, Mixed/ Multiple and 'Other ethnic groups');. This percentage is nearly double that across England (26%) but lower than London (63%);
- 17.4% of the population are of Asian ethnicities, up from 11.6% in 2011, a 6.0% increase, the largest increase of all high level ethnic groups;
- 5.9% are of Black ethnicities, up from 4.8% in 2011
- 11.1% of the population are White, from non-British backgrounds, up from 6.4% in 2011.
- the remaining 57% of the population in LB Sutton was White British, compared to 71% at the 2011 Census. higher than London (37%) but below the England average (74%)
- this change in the ethnic makeup of Sutton's population has happened faster than models had predicted. Previous estimates anticipated it would take another decade for 56% of the population to be White British;
- the population of school pupils in LB Sutton is more diverse compared to population as a whole. In 2021-22, 48% of pupils were from Asian, Black, or Mixed/Multiple ethnic backgrounds: 27% are Asian, 8% are Black, 11% are of Mixed ethnicities, and 2% are from other ethnic groups;
- in the last two years there has been significant migration into the borough, with LB Sutton welcoming more than 2,000 people from Hong Kong. More recently, smaller numbers of refugees from Ukraine and Afghanistan have also moved to the LB Sutton.
- the number of residents from 'Other White'. Mixed (mainly White & Black Caribbean) and Asian (mainly Indian and Other Asian) groups will grow over the next decade;

Figure 3.3: Ethic breakdown by Ward - Census 2021



Source: Census 2021

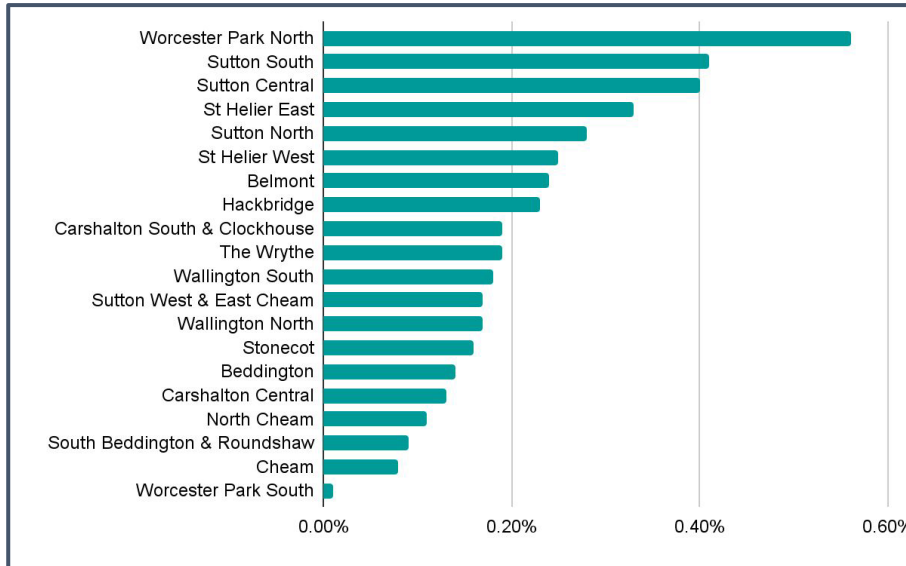
## GYPSIES AND TRAVELLERS

3.9 Research conducted by the ONS to understand the lived experience of Gypsy and Traveller communities, reported that they experienced a range of health conditions, which, coupled with delayed healthcare seeking and perceived barriers to accessing healthcare, could lead to vulnerability to negative health outcomes.

3.10 In the 2021 census, 129 LB Sutton residents reported their ethnicity as Gypsy or Irish Traveller, and 332 as Roma, making up 0.2% of Sutton's population. As of January 2022, there were:

- 44 caravans occupied by Travellers; this number has remained steady over the last six counts;
- 66% of caravans are socially rented, with the remaining 34% privately owned;
- all of the Traveller caravans in LB Sutton were on authorised sites;
- there are two traveller sites within the Borough - both are in Carshalton Road, near Woodmansterne.

**Figure 3.4: Percentage of residents from gypsy and Irish Traveller or Roma ethnicities by Ward 2021**



## DISABLED PEOPLE

### Physical disabilities

**3.11** Estimates show that 16% of residents in Sutton have a disability<sup>14</sup>. In 2020, the most prevalent disabilities amongst residents in Sutton were:

- 'some' hearing loss - 9,389 people per 100,000;
- impaired mobility - 5,348 people per 100,000;
- moderate personal care disabilities - 3,861 people per 100,000.

**3.12** It is estimated that the number of residents with physical disabilities will increase over the next 15 years. This is likely a result of an ageing population and certain long-term conditions. The biggest increases are forecast to come from:

**3.13** Long-term conditions caused by a stroke Hearing loss Type 1 and 2 Diabetes

### Learning disabilities and autism

**3.14** Estimates show that 0.6% of residents have a learning disability in LB Sutton. In 2020, the most prevalent learning disabilities amongst residents were:

- Moderate or severe learning disabilities - 704 people per 100,000
- Moderate or severe learning disabilities and living with a parent - 252 people per 100,000

**3.15** It is projected that there will be a marginal increase in the rate of learning disabilities over the next 15 years in Sutton. Exceptions to this are the rate of people with Down's syndrome, and challenging behaviour, which are likely to remain the same.

**3.16** The estimated prevalence of autism amongst children in LB Sutton is slightly higher than the national average, at 1.9%. In LB Sutton, as of 2020, it was estimated that 1.0% of the population of adults aged 18-64 have autism<sup>10</sup>

<sup>10</sup> estimated percentage of children with autism spectrum disorders across London.. Source: JAMA Pediatrics, 2020

## SEXUALITY

**3.17** According to the 2021 Census:

- 90.0% of LB Sutton residents identify as Straight or Heterosexual;
- 1.2% of LB Sutton residents identify as Gay or Lesbian;
- 1.0% of LB Sutton residents identify as Bisexual;
- 0.2% of LB Sutton residents identify as Pansexual;
- 0.04% of LB Sutton residents identify as Asexual;
- 0.01% of LB Sutton residents identify as Queer; and
- 0.01% of LB Sutton residents identify as another sexual orientation.

**3.18** Fewer LB Sutton residents identify as Gay or Lesbian, Bisexual, Pansexual, Asexual, Queer, or another sexual orientation than the London and England averages. The percentages reported in the Census are lower than previous estimates, which may suggest some of the 7.7% of people who did not answer the question did not feel comfortable sharing their sexual orientation.

## GENDER IDENTITY

**3.19** According to the 2021 Census:

- 93.5% of residents identify with the same gender as the sex on their birth certificate, comparable to across England (93.5%), but below the London average (91.2%);
- 0.5% of residents identify with a different gender to the sex they were registered with at birth;
  - 0.2% did not specify their gender identity;
  - 0.1% identified as a trans man;
  - 0.1% identified as a trans woman;
  - 0.04% identified as non-binary;
  - 0.03% identified with another gender identity.
- 6.0% of LB Sutton residents did not answer the question, so the true number may be higher.

## SOCIO-ECONOMIC DEPRIVATION AND POVERTY

### Index of Multiple Deprivation

**3.20** The Index of Multiple Deprivation (IMD) is the official measure of relative deprivation for small areas in England. The indices are based on 39 separate indicators, organised across seven distinct domains of deprivation.

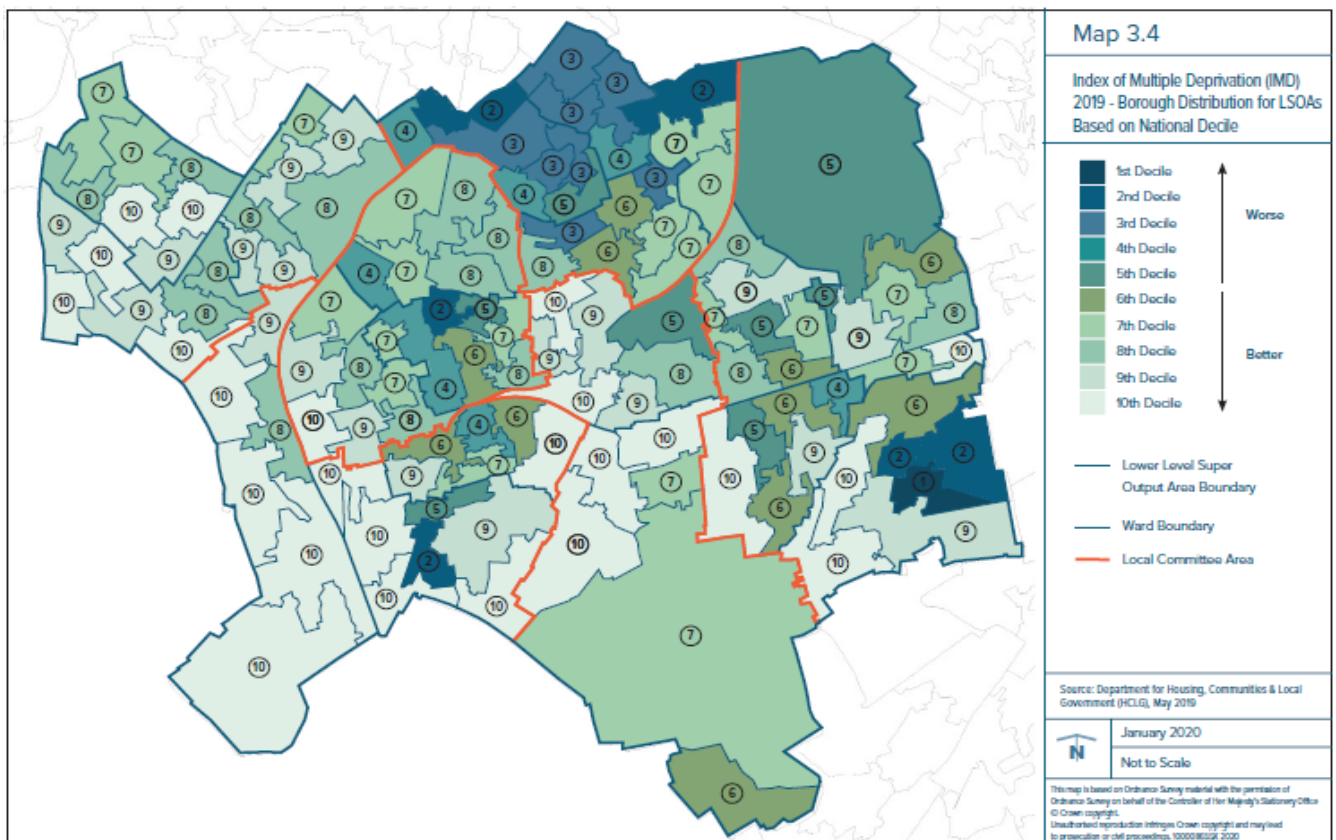
**3.21** Table 3.5 shows that LB Sutton is a relatively less deprived borough and based on the IMD (2019) is ranked 226th overall out of 317 local authorities in England (the 1st being most deprived). There are pockets of significant deprivation in the borough, shown by the darker areas in Fig. 13. 6% of small areas (seven out of 121) in Belmont, Hackbridge, South Beddington & Roundshaw, St Helier East, St Helier West and Sutton Central wards are in the 20% most deprived areas in the country. These neighbourhoods are often next to some of the least deprived in England. 35% of LB Sutton's neighbourhoods (42 out of 121) are in the 20% least deprived areas in England. Although it is difficult to compare one IMD release with another, in 2015 there were fewer small areas in LB Sutton in the most affluent 20% in England (39 out of 121), compared to 2019, but the same number in the most deprived 20% (7 out of 121).

**3.22** Further details are provided in and Figure 3.5 below.

**Table 3.5: Index of Multiple Deprivation (IMD 2019)<sup>11</sup>**

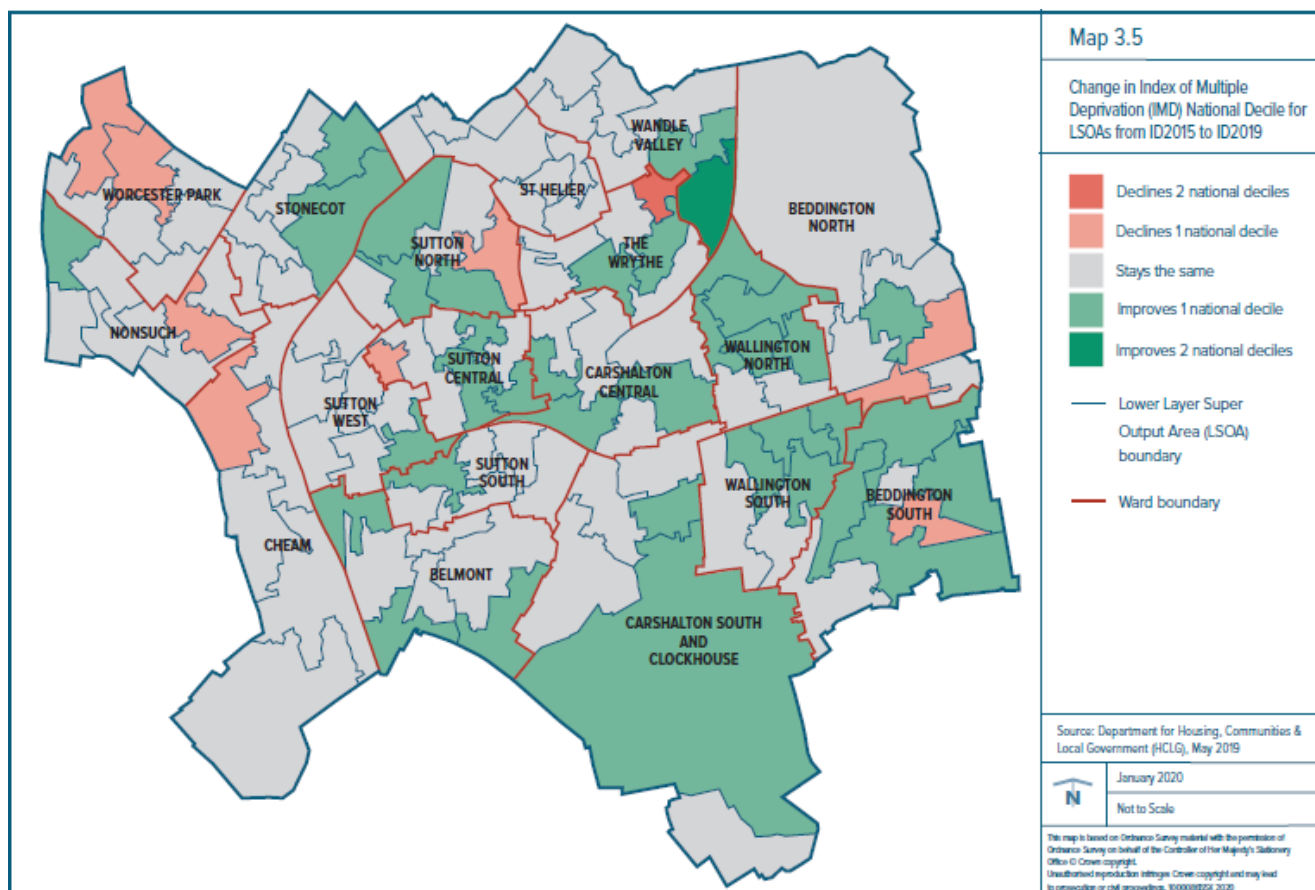
Deprivation Indicator	IMD 2010	IMD 2015	IMD 2019
<b>BOROUGH RANKING COMPARED TO OTHER LAs IN ENGLAND AND LONDON</b>			
LB Sutton ranking compared to the 317 local authority areas in England based on IMD 2019 'rank of average score' (1 <sup>st</sup> = most deprived and 317 <sup>th</sup> = least deprived)	<b>196<sup>th</sup></b> most deprived in England	<b>215<sup>th</sup></b> most deprived in England	<b>226<sup>th</sup></b> ↓ most deprived in England
LB Sutton ranking compared to the 33 London Boroughs	<b>5<sup>th</sup></b> least deprived	<b>5<sup>th</sup></b> least deprived	<b>3<sup>rd</sup></b> ↓ least deprived in London
<b>RANK OF LOWER LAYER SUPER OUTPUT AREAS (LSOAs) IN LBS COMPARED TO ALL OTHER LSOAs IN ENGLAND</b>			
Lower layer super output areas (LSOAs) in LB Sutton ranked in the <b>20% most deprived</b> LSOAs in England <sup>12</sup>	<b>6 out of 121</b>	<b>7 out of 121</b>	<b>7 out of 121</b> Beddington South (3); Belmont (1); Wandle Valley (1); St Helier (1); Sutton Central (1)
LSOAs ranked within the <b>10% most deprived</b> LSOAs in England	<b>0 out of 121</b>	<b>1 out of 121</b>	<b>1 out of 121</b> Beddington South (1)
LSOAs ranked within the <b>20% least deprived</b> LSOAs in England	<b>27 out of 121</b>	<b>39 out of 121</b>	<b>42 out of 121</b> ↑
LSOAs ranked within the <b>10% least deprived</b> LSOAs in England	<b>10 out of 121</b>	<b>17 out of 121</b>	<b>23 out of 121</b> ↑
<b>CHANGE IN RANKING FOR LSOAs IN LB SUTTON SINCE IMD 2015</b>			
LSOAs becoming <b>less deprived</b> in their relative ranking compared to all LSOAs in England (up at least one decile)	<b>n/a</b>		<b>39 out of 121</b> - up one decile: 38 - up two deciles: 1
LSOAs <b>maintaining</b> their relative ranking since 2015 (deciles)	<b>n/a</b>		<b>73 out of 121</b>
LSOAs becoming <b>more deprived</b> in their relative ranking compared to all LSOAs in England (down at least one decile)	<b>n/a</b>		<b>10 out of 121</b> - down two deciles: 1 - down one decile: 9
Source: Index of Multiple Deprivation (IMD), Department for Housing, Communities and Local Government (HCLG) May 2019			

**Figure 3.5: Index of Multiple Deprivation 2019 – Borough Distribution based on IMD 2019 Ranked Scores for Lower Super Output Areas (LSOAs)**



<sup>11</sup> the Index of Multiple Deprivation (IMD), prepared by the Department for Housing, Communities and Local Government (HCLG), is the Government's official measure of relative deprivation for small areas and neighbourhoods in England  
<sup>12</sup> there are 32,844 lower layer super output areas (LSOAs) in England

Figure 3.5: Index of Multiple Deprivation – Change in IMD national decile for LSOAs between 2015 and 2019



### Poverty (including fuel poverty)

**3.23** Poverty is often a symptom of complex problems and too often these issues are passed on from one generation to the next. Children in families affected by poverty can have reduced chances of success in their own lives.

**3.24** It is estimated that 18% of residents live in poverty. The proportion of residents living in poverty is around a third lower than the London average (27%). A higher proportion of children live in poverty than the general population. Between 2015 and 2020, it was estimated that around 30% of children lived in poverty in the borough, declining to 25% in 2021. The proportion of children living in poverty in Sutton is lower than London (30%), and England (27%). Data for 2021 is less reliable than previous years as a result of data quality issues caused by the pandemic. This may mean the apparent decline between 2020 and 2021 is exaggerated

**3.25** One aspect of poverty residents experience is fuel poverty. The drivers of fuel poverty are low income, poor energy efficiency, and high energy prices. People experiencing fuel poverty are more likely to live in cold homes. Living in a cold home is associated with poor health outcomes and an increased risk of death for all age groups. More than one in five (21.5%) excess winter deaths in England and Wales are attributable to the coldest 25% of housing. As of 2022, 9.8% of households in LB Sutton experienced fuel poverty, below the London average of 11.5%, and 13.2% in England. However, this masks variation in the borough, with over 20% of households experiencing fuel poverty in some neighbourhoods.

**Table 3.6: Fuel Poverty**

ODI Indicator 2022	LB Sutton 2022 (England ranking)	South London Sub-Region Average	London 2022	England 2022
Proportion of households in fuel poverty	<b>9.8%</b> (265 out of 333)	10.0%	11.5%	13.2%
Total Fuel Poverty Risk Score (Fuel Poverty Risk Index)	<b>32.7</b> (230 out of 307)	29.5	n/a	39.1%

Source: Open Data Institute Fuel Poverty Risk Index January 2023



## Housing Affordability

**3.26** Housing affordability affects where people live and work and influences health (e.g. the quality of housing, poverty, community cohesion, and time spent commuting).

**3.27** It is slightly more affordable for residents to buy a house in LB Sutton than across London. The median house price in LB Sutton is 11.6 times the median annual salary. This is slightly lower than London, where the median house is 12.5 times the median annual salary. In contrast, buying a home in England costs 7.8 times the median annual salary.

**3.28** Housing tenure in LB Sutton differs significantly from the regional average. 20% of people in LB Sutton rent their home from a private landlord, significantly below the regional average. 14% of households rent from a social landlord, also below the regional average. 64.7% of the population in LB Sutton are homeowners (including those who own outright and bought with a mortgage). This is one of the highest proportions of all London boroughs and higher than the London (46.0%) and the England (61.7%) averages.

**3.29** Table 3.7 sets out affordable housing need in the Borough based on Sutton's Strategic Housing Market and Local Housing Needs Assessment carried out in 2022

**Table 3.7: Affordable Housing Need.**

Rented Affordable Need						Affordable Home Ownership Need	Total Annual Need
Current Need	Newly Formed Households	Existing Households falling in Need	Total Gross Need	Relet Supply	Net Rented Need		
353	1,066	135	1,554	158	1,396	262	1,658
Source: Strategic Housing Market and Local Housing Needs Assessment, 2022							





## 4. RESULTS OF EqIA

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### INTRODUCTION

4.1 This chapter sets out the results of the Equalities Impact Assessment (EqIA) for each of the Council's strategic options and draft policies put forward in Section of the Local Plan Issues and Preferred Options (Regulation 18) document. For each strategic option or draft policy, the extent of the likely beneficial or adverse impacts on each target equality group is recorded in the Equalities Impact Assessment Matrix using the symbols shown below in Table 4.1/

**Table 4.1: Guide to Symbols Used in the EqIA Screening Matrix**

Symbol	Predicted Effect of Option on Equality Target Group Objective
++	High level beneficial impact (specific to the group)
+	Low level beneficial impact
?	Uncertain impact
X	Adverse impact
	None/ neutral effect

4.2 The Matrix also provides an evaluation of the reasoning behind the assessment of each impact.



**Table 4.2: Equalities Impact Assessment (EqIA) of strategic options and draft policies set out in the Local Plan Local Plan Issues and Preferred Options (Regulation 18) document (July 2024)**

	Women	Asian, Black, Mixed/ Multiple and White non-British	Older people	Young people and children	Disabled and people with a limiting long-term illness	Lesbians, gays, bisexuals and transgender (LGTB+)	People Affected by Social Deprivation	Gypsies and Travellers
<b>STRATEGIC POLICIES: BOROUGH-WIDE</b>								
<b>ISSUE 1: ESTABLISHING SUTTON'S GROWTH NEEDS - updates Policy 1 of Local Plan 2018</b>								
<b>1.1 Housing (net homes per year)</b>								
OPTION A: <b>Low growth:</b> Minimum of 469 units to 2029 and minimum of 403 units from 2029 - 2041 (current London Plan housing target for Sutton)								
OPTION B: <b>Medium growth</b> Minimum of 650 units (uplift on current London Plan target and broadly equivalent to Sutton's housing need figure before national urban uplift is applied,)								
OPTION C: <b>High growth</b> Minimum of 886 units (Sutton's capped housing need figure)								
OPTION A: Low growth			+	+	+		+	
OPTION B: Medium growth			+++	+++?	+++		+++	
OPTION C: High growth			++	++?	++		++?	
<p>While <b>Option C (high housing growth)</b> would deliver the most housing over the plan period (minimum 886 units) and therefore go further towards meeting Sutton's capped housing needs figure and providing family homes, the dispersed spatial approach required to achieve this level of housing growth would require the Borough's district centres and the suburban heartlands to accommodate significant levels of development along with Sutton Town Centre and its surrounding Area of Potential Intensification (API). As with Spatial Strategy Option 3 under Policy Issue 2 ('Dispersed Development'). However, the results of the EqIA indicate that Option 3 compares unfavourably with Options 1 (low growth) and 2 (medium growth) in terms of its potential impact on equalities target groups. Firstly, Option C would lead to high levels of housing development in dispersed and less sustainable locations with poor public transport accessibility thus leading to greater reliance on the private car. It is well established that older people; young people and children (young people); disabled people and people affected by a limiting long-term illness (disabled people); and people affected by social deprivation are generally much more reliant on public transport than the general population and disproportionately affected by the negative environmental and health effects of increased traffic congestion, noise and air pollution. Secondly, Option C would restrict the ability to accommodate social and community infrastructure to support housing growth, again likely to disproportionately affect the above equalities groups. Thirdly, Option C would necessitate the strategic release of Green Belt/ MOL and other greenfield sites, negatively affecting young.</p> <p>In contrast, <b>Option A (low housing growth)</b> would mean that the vast majority of additional housing would be accommodated within Sutton Town Centre and its surrounding API, with the seven district centres accommodating smaller levels of development and limited development in suburban heartlands (broadly aligned with Spatial Strategy Option 1 'Sutton Town Centre First' under Policy Issue 2). While this option would only deliver a minimal amount of additional housing over the plan period (469 ndpa) falling well short of meeting identified housing needs (scoring +), there are a number of positive sustainability impacts in terms of protecting Green Belt/ MOL and other greenfield sites; urban greening and biodiversity; ensuring that the vast majority of development is accommodated in the most sustainable locations with the best public transport accessibility and access to services; maintaining the ability of the Borough accommodate infrastructure requirements and quality of life. On the negative side, the delivery of affordable housing units over the plan period would have negative impacts on people affected by socio-economic deprivation. Overall, Option A has some benefits for equalities target groups compared to Option C.</p> <p><b>Option B (medium housing growth)</b> is and would mean that significant housing growth is accommodated within Sutton's seven district centres and their surrounding APIs in addition to Sutton Town Centre and is therefore broadly aligned with Spatial Strategy Option 2 'Sutton Town and District Centre Network' under Policy Issue 2. While this intermediate option would deliver less additional housing than the high growth option (scoring ++), as with Option 1, there are a number of positive impacts on equalities target groups by comparison with Options A (low housing growth) and C (high housing growth). Ensuring that most new development is accommodated in the most sustainable locations with the best transport accessibility and access to services will benefit older people; young people; disabled people; and people affected by social deprivation since these groups are much more reliant on public transport than the general population and disproportionately affected by the negative environmental and health effects of traffic congestion, noise and air pollution. By protecting Green Belt/ MOL and other greenfield sites, Option B will help to mitigate the severity of summer heat-wave and the the urban heat island (UHI) effect, which would otherwise have disproportionate effects on older people; young people; disabled people; and people affected by social deprivation.</p>								
<b>1.2 Industry Floorspace* (Delivered with a building footprint to plot ratio of 65%)</b>								
OPTION A: Low growth - 100,000 sq.m. (based on past trends projection)			+	+	+		+	
OPTION B: Medium growth - 166,760 sq.m. (based on meeting need in full)			+++	+++?	+++		+++	
OPTION C: High growth - 166,760 sq.m. + (based on exceeding need)			++	++?	++		++?	
<p>The outcome of the EqIA shows that <b>Option A (low growth in industry floorspace)</b> would have some potential benefits for equalities target groups by minimising traffic growth and congestion on the Borough's road network. This is because older people; young people; disabled people and people affected by ill-health are disproportionately affected by the negative environmental and health effects of increased traffic congestion, noise and air pollution. By protecting Green Belt/ MOL and other greenfield sites across the Borough, Option A will also help to mitigate the severity of summer heat-wave events and the the urban heat island (UHI) effect, which would otherwise have disproportionate effects on older people; young people; disabled people; and people affected by social deprivation. On the other hand, Option A may have the effect of constraining economic and job opportunities for people affected by social deprivation.</p> <p>Option C (<b>high growth in industry floorspace</b>) would seek to exceed the identified high demand for new industrial floorspace (167,000 sq.m) as identified in the ELENA 2023 and therefore help to promote economic growth and a strong, sustainable and high-skilled local economy (as with Option 2). While there may be some positive impacts for people affected by social deprivation by increasing the supply of employment floorspace within the Borough, there would be a number of negative impacts on older people; young people; disabled people and people affected by ill health arising from the potential loss of MOL or other greenfield sites for industrial use; ;increased traffic levels and congestion on the Borough's road network; increased air pollution; and taking up land needed for housing and/or essential community infrastructure.</p> <p>Option B (<b>medium growth in industry floorspace</b>) would help to meet the high demand for new industrial floorspace (167,000 sq.m). and have potential beneficial impacts on people affected by social deprivation by promoting sustainable economic growth and creating employment opportunities. Since the level of industrial floorspace provision would be significantly higher than in the current Local Plan 2018, there may be greater pressures in terms of the potential need for strategic release of MOL, uptake of potential housing sites and impacts on the local road network and local air quality arising from greater HGV movements, but less so than Option C</p>								
<b>1.3 Office Floorspace (sq.m. per year)</b>								
OPTION A: Low growth (Minimum 15,000 sq.m. for first 5 to 10 years of plan period)								
OPTION B: Medium growth (Minimum 56,620 sq.m.) floorspace to job ratio of 7.4 sq.m.)								
OPTION C: High growth (81,583 sq.m (floorspace to job ratio of 12 sq.m.)								
It is not considered that there are significant impacts on equalities target groups arising from any of the three policy options (A, B and C) relating to Office Floorspace.								
<b>1.4 Retail Floorspace (sq.m of convenience retail)</b>								
OPTION A - 1,340 sq.m. (Convenience Retail)							+	
OPTION B 1,340 sq.m. (Convenience Retail)							+	
OPTION C - 1,340 sq.m+ (Convenience Retail)								
<p>Within the context of the current challenging retail environment, recently exacerbated by the pandemic and the growth of online shopping, Sutton's Town Centres and Retail Needs Assessment concludes that Sutton has a surplus of comparison floorspace (-2,911 sq.m.) and that there is a small need for convenience retail over the plan period (1,340 sq.m.). For food &amp; beverage there is an identified need of 12,472 sq.m. by 2041. However there is the potential to promote higher quality and more efficient retail space to meet modern requirements in place of older stock. Options A and B, both of which would seek to deliver an additional 1,340 sq.m. of Convenience Retail floorspace are considered to have beneficial impacts on town centre vitality and viability and sustainable economic growth compared to Option C. With the exception of potential benefits for people affected by social deprivation, there are minimal significant impacts on equalities target groups arising from any of the three policy options (A, B and C) relating to Retail Floorspace</p>								

	Women	Asian, Black, Mixed/ Multiple and White non-British	Older people	Young people and children	Disabled and people with a limiting long-term illness	Lesbians, gays, bisexuals and transgender (LGTB+)	People Affected by Social Deprivation	Gypsies and Travellers
<b>1.5 Food and beverage (sq. m.)</b>								
OPTION A: 12,472 sq.m.(based on meeting need in full)			+	+	+		+	
OPTION B: 12,472 sq.m. + (based on exceeding need)			+	+	+		+	
OPTION C: 12,472 sq.m. +(based on exceeding need)			+	+	+		+	
All three options (A, B and C) seek to meet the identified need for food and beverage floorspace identified in Sutton's Town Centres and Retail Needs (12,472 sq.m. by 2041). By seeking to go beyond this minimum level of provision over the plan period, policy Options B and C are potentially more beneficial in terms of town centre vitality and viability sustainable economic growth and promoting access to convenience shopping. All three food and beverage options would be expected to have some positive benefits for women; older people; disabled people and people suffering from ill-health by promoting access to convenience shopping, since these equalities target groups are more reliant on public transport, walking and cycling and are less likely to have access to a private car. There are also some benefits for people affected by social deprivation, both in terms of increasing access to convenience shopping and also in terms of enhancing employment opportunities in the retail sector								
<b>1.6 Infrastructure</b>								
OPTION A: Metroisation & improved bus service; New Healthcare facilities; Retain safeguarded primary school in Sutton TC.			++	++	++		++	
OPTION B: Metroisation & improved bus service; New Healthcare facilities.Retain safeguarded primary school in Sutton TC.			++	++	++		++	
OPTION C Significant public transport improvements; New healthcare facilities; New primary & secondary schools.			+++	+++	+++		+++	
The introduction of 'metroisation' and an improved bus service under Infrastructure Options A and B would have significant positive impacts for older people; young people; disabled people and people affected by ill-health; and people affected by social deprivation since these groups are much more reliant on public transport than the general population and disproportionately affected by the negative environmental and health effects of increased traffic congestion. These positive impacts would be greater with the introduction of 'significant public transport improvements' under Infrastructure Option C. There are also benefits for young people/ children arising from the continued safeguarding of land for a primary school in Sutton Town Centre under Infrastructure Options A and B, and greater benefits under Option C which proposes new primary and secondary schools. The new healthcare facilities proposed under all three options will have particular benefits for disabled people; people affected by ill-health and children and people affected by social deprivation.								
<b>ISSUE 2: SPATIAL STRATEGY- updates Policy 1 of Local Plan 2018</b>								
	<b>OPTION 1: SUTTON TOWN CENTRE-FIRST</b> STC 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 LCH delivers significant medical research floorspace and potentially a new hospital		<b>OPTION 2: SUTTON TOWN AND DISTRICT CENTRE NETWORK</b> STC 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. Industrial development is largely accommodated in SILs but with some new areas designated. The LCH delivers significant medical research floorspace and potentially a new hospital.			<b>OPTION 3: DISPERSED</b> 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. 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		
OPTION 1: SUTTON TOWN CENTRE-FIRST			+	+	+		+	
OPTION 2: SUTTON TOWN AND DISTRICT CENTRE NETWORK			+++	+++?	+++		+++	
OPTION 3: DISPERSED			++	++?	++		++?	
While Sutton Town Centre and its surrounding (API) would still accommodate most of the borough's development needs, <b>spatial strategy Option 3 'dispersed growth'</b> (aligned with Option C under Issue 1.1 above) would also allow significant levels of new housing, industrial development and other forms of growth to be accommodated within the district centres and the suburban heartlands of the Borough. Although adopting a dispersed growth strategy would potentially maximise housing delivery (minimum of 886 units), Option 3 compares unfavourably with Options 1 (Sutton Town Centre First) and Option 2 (Sutton Town and District Centre Network) in terms of its potential impact on equalities target groups. Firstly, Option 3 would lead to high levels of housing development in dispersed and less sustainable locations with poor public transport accessibility thus leading to greater reliance on the private car. It is well established that older people; young people and children (young people); disabled people and people affected by a limiting long-term illness (disabled people); and people affected by social deprivation are generally much more reliant on public transport than the general population and disproportionately affected by the negative environmental and health effects of increased traffic congestion, noise and air pollution. Secondly, Option C would restrict the ability to accommodate social and community infrastructure to support housing growth, again likely to disproportionately affect the above equalities groups. Thirdly, Option 3 would necessitate the strategic release of Green Belt/ MOL and other greenfield sites, negatively affecting young people in particular. Such adverse effects may include the potential loss of greenfield sites, the strategic release of Green Belt/ MOL; greater reliance on the private car, congestion and pollution due to developing new housing and other travel generating development in locations with poor public transport accessibility; the need to designate new areas of employment land; adverse impacts on local amenity and the suburban character of the Borough; the ability to accommodate social and community infrastructure; pressures to develop within flood risk areas against sequential test principles.This is considered to be the least sustainable of the three spatial strategy options. The negative sustainability impacts associated with Spatial Strategy Option C are reflected in the scores awarded in the appraisal matrix								
In contrast, spatial strategy <b>Option 1 'Sutton Town Centre First'</b> (closely aligned with Option A under Issue 1.1 above) would mean that the vast majority of development and growth (including new housing) would be accommodated in the most sustainable part of the Borough with the best public transport accessibility and access to services while ensuring that greenfield sites and the highly valued character and quality of the suburban heartlands is protected. There would also be no need to designate additional industrial sites. While this option would only deliver a minimal amount of additional housing over the plan period (469 ndpa) falling well short of meeting identified housing needs (scoring +), there are a number of positive sustainability impacts in terms of protecting Green Belt/ MOL and other greenfield sites; urban greening and biodiversity; ensuring that the vast majority of development is accommodated in the most sustainable locations with the best public transport accessibility and access to services; maintaining the ability of the Borough to accommodate infrastructure requirements and quality of life. On the negative side, the delivery of affordable housing units over the plan period would have negative impacts on people affected by socio-economic deprivation. Overall, Option A has some benefits for equalities target groups compared to Option C.								
Spatial strategy <b>Option 2 'Sutton Town and District Centre Network'</b> (aligned with Option B under Issue 1.1 above) is represents an intermediate policy position. This option would go further than Option A in meeting identified housing needs including for family and affordable homes and ensuring that infrastructure requirements are distributed across district centres as well as within Sutton Town Centre. As with Option A, development and growth is still delivered in sustainable locations but access to public transport and services is lower in district centres than the town centre. Unlike the dispersed growth option however (Option C), Option B would not lead to the loss of greenfield sites, strategic release of MOL/Green Belt, affect urban greening, BNG or flood risk management objectives. While this intermediate option would deliver less additional housing over the plan period than the high growth option (scoring ++), as with Option 1, there are a number of positive impacts on equalities target groups by comparison with Options A (low housing growth) and C (high housing growth). Ensuring that most new development is accommodated in the most sustainable locations with the best public transport accessibility and access to services will benefit older people; young people; disabled people; and people affected by social deprivation since these groups are much more reliant on public transport than the general population and disproportionately affected by the negative environmental and health effects of increased traffic congestion, noise and air pollution. By protecting Green Belt/ MOL and other greenfield sites across the Borough, Option B will help to mitigate the severity of summer heat-wave events and the urban heat island (UHI) effect, which would otherwise have disproportionate effects on older people; young people; disabled people; and people affected by social deprivation								

	Women	Asian, Black, Mixed/ Multiple and White non-British	Older people	Young people and children	Disabled and people with a limiting long-term illness	Lesbians, gays, bisexuals and transgender (LGTB+)	People Affected by Social Deprivation	Gypsies and Travellers
<b>ISSUE 3: NET ZERO CARBON - new strategic policy</b>								
<p>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:</p> <p>(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.</p> <p>(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.</p> <p>(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 schemes.</p> <p>(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.</p> <p>(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</p> <p>(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).</p>								
<b>DRAFT POLICY 3: Net Zero Carbon</b>			+++	+++	++		+++	
<b>LOCAL PLAN 2018: POLICY 31</b>			++	++	+		++	
<p><b>Draft Strategic Policy 3 on 'Net Zero Carbon'</b> significantly strengthens Sutton's planning policy position on climate change mitigation by introducing a strategic planning policy on 'net zero' for the first time (this was absent from the Local Plan 2018) and aligning the Local Plan policies with the aims of the UK Net Zero Strategy, the Mayor's Vision of a Zero Carbon City and Sutton's Environment Strategy and Climate Emergency Response Plan 2019-25. Together with the relevant strategic objectives, Draft Policy 3 sets out a much more ambitious policy position than the Local Plan 2018 by (i) aiming for net zero standards to be achieved in all new residential and commercial developments - not just major developments (ii) requiring all new Council housing, estate regeneration schemes and new or refurbished Council buildings, schools and other public buildings, to target net zero carbon standards on-site, incorporate Passivhaus principles and demonstrate exemplary standards of sustainable design and construction, and (iii) promoting the development and/or expansion of low or zero carbon district heat networks served by local secondary heat sources.</p> <p>Draft Strategic Policy 3 also provides support for the role carbon offsetting in delivering energy retrofit measures for existing Council housing, other social housing managed and other Council-owned buildings as part of the Government's public sector decarbonisation programme and for promoting the circular economy in line with the South London Waste Plan DPD. While the strengthened policy position on net zero and climate change mitigation is appraised in the SA Report as having significant and long-term beneficial impacts for the whole community in terms of addressing the causes of climate change; reducing pollution; promoting area renewal, economic investment and the Borough's green economy; and addressing fuel poverty, there are particular benefits for those equalities target groups who are known to be more vulnerable to climate impacts (e.g. increased frequency and severity of summer heatwaves; air pollution and flooding events). Equalities target groups expected to benefit from stronger policies on 'net zero' therefore include young people and children; older people; disabled people, people suffering from ill-health and people affected by social deprivation.</p>								
<b>ISSUE 4: FLOOD RISK MANAGEMENT AND MAKING SPACE FOR WATER - new strategic policy</b>								
<p>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:</p> <p>(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);</p> <p>(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;</p> <p>(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);</p> <p>(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</p> <p>(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:</p> <p>(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;</p> <p>(ii) all other designated 'main rivers' within the borough identified in the Thames River Basin Management Plan, including the Beverley Brook and Pyl Brook.</p>								
<b>DRAFT POLICY 5: Flood Risk Management and Making Space For Water</b>			+++	+++	++		+++	
<b>LOCAL PLAN 2018: POLICY 32</b>			++	++	+		++	
<p>By seeking to manage flood risk from all sources and making space for water in partnership with developers, statutory undertakers, lead local flood authorities (LLFAs), the EA and local communities, <b>Draft Strategic Policy 4 on 'Flood Risk Management and Making Space for Water'</b> strengthens Sutton's planning policy framework on flood risk management and catchment-based planning by introducing a strategic Local Plan policy on this issue for the first time (absent from the Local Plan 2018) and aligning the Local Plan much more closely with the aims of the Wandle Catchment Plan, the Wandle Valley Regional Park, Sutton's Local Flood Risk Management Strategy and Action Plan and Sutton's Surface Water Management Plan (SWMP). There is also recognition of the need to steer vulnerable developments away from the floodplain and other flood risk areas in line with the sequential approach; to 'make space for water' through a catchment based approach and to coordinate flood risk management objectives with a range of other key sustainability imperatives such as promoting 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. Draft Strategic Policy 4 also sets a local planning policy context (also referencing the Sutton's Local Flood Risk Management Strategy and Action Plan) for securing Securing Grant in Aid funding from DEFRA and local levy funding for the delivery of strategic flood alleviation schemes across the Borough. Significant beneficial impacts are therefore identified for those equalities target groups who are generally more vulnerable to the impacts of fluvial, surface water, groundwater and sewer flooding. These include young people and children, older people and those with a limiting long-term illness. Much of the local evidence base underpinning the effective implementation of this strategic Local Plan policy, the relevant 'development management' flood risk policies relating to flood risk and the sequential testing of potential site allocations is provided in the strategic flood risk assessment (SFRA) Level 1 Report.</p>								



	Women	Asian, Black, Mixed/ Multiple and White non-British	Older people	Young people and children	Disabled and people with a limiting long-term illness	Lesbians, gays, bisexuals and transgender (LGTB+)	People Affected by Social Deprivation	Gypsies and Travellers
<b>ISSUE 5: URBAN GREENING AND CLIMATE CHANGE ADAPTATION - new strategic policy</b>								
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 standards.								
<b>DRAFT POLICY 5: Urban Greening and Climate Change Adaptation</b>			+++	+++	++		+++	
<b>LOCAL PLAN 2018: Policy 33</b>			++	++	+		++	
This is a new strategic policy. By comparison with the current Local Plan 2018, <b>draft Strategic Policy 5 on 'Urban Greening and Climate Change Adaptation'</b> provides a much stronger planning policy basis for coordinating the delivery of Borough-wide urban greening, open space, biodiversity, sustainable drainage (SuDS), healthy streets and climate change adaptation (including climate justice) objectives. By seeking to protect and enhance the borough's existing network of green and blue spaces and create new green infrastructure as 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, it therefore responds to and brings together a number of important policy imperatives including mandatory biodiversity net gain (BNG); the requirement on Boroughs to develop GI strategies under Policy G5 of the London Plan 2021; the emerging London Green Infrastructure Framework (LGIF) (replacing the former London Green Grid), the Local Nature Recovery Plan and Sutton's Environment Strategy and Climate Emergency Response Plan 2019 - 2025. In contrast to the prevailing situation when the current Local Plan 2018 was being prepared, an abundance of Borough-wide spatial data is now available from bodies such as the GLA, Greenspace Information for Greater London (GiGL) and consultants recently commissioned by the Council to undertake baseline assessments of biodiversity value on key blue and green infrastructure assets and linkages across the borough; opportunities for urban greening interventions such as pocket parks and SuDS retrofit measures and areas affected by summer heatwaves and the urban heat island effect (UHI) and where GI interventions would be most effective. There are now much greater opportunities for the Council to focus the delivery of urban greening interventions where they are most needed and set long term GI targets for specific areas of the Borough where growth and development is likely to occur e.g. Sutton Town Centre. This draft Policy is therefore assessed as having large beneficial effects on all relevant sustainability objectives making up the SA Framework as shown above. It is well established that a number of equalities target groups are more vulnerable to the adverse impacts of climate change, such as the increased frequency and severity of heatwaves, the 'urban heat island (UHI) effect; air pollution and flooding events. It is therefore considered that young people and children; older people, those with a limiting long-term illness; disabled people and people affected by social deprivation and likely to benefit from the strengthened policy approach to climate change adaptation being proposed via draft Strategic Policy 5 on 'Urban Greening and Climate Change Adaptation'.								
<b>ISSUE 6: BIODIVERSITY AND HABITATS - new strategic policy</b>								
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								
<b>OPTIONS</b>								
- Preferred Option: Options 1-4 inclusive (see below)								
- Option 1: Habitat Creation								
- 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 where (i) the current baseline biodiversity value is low e.g. Sutton TC or where (ii) opportunities exist for habitat creation e.g. Beddington Farmlands/ Beddington Park (StatMetric).								
(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 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.								
<b>PREFERRED OPTION: (Options 1-4 inclusive)</b>			+++	+++	++		+++	
<b>OPTION 1: Habitat creation</b>			++	++	+		++	
<b>OPTION 2 Protecting SINCs</b>			++	++	+		++	
<b>OPTION 3 Increasing biodiversity value (borough)</b>			++	++	+		++	
<b>OPTION 4 Increasing biodiversity value (specific areas)</b>			++	++	+		++	
This is a new strategic policy. The SA Report has identified that all five policy options for Issue 6 'Biodiversity and Habitats' would have significant benefits in relation to open space provision; urban greening (thereby providing cooling and mitigating air pollution); biodiversity net gain (BNG); flood risk management/resilience and climate justice. By comparison with the general population, a number of equalities target groups are relatively more vulnerable to climate impacts, such as the increased frequency and severity of heatwaves, the 'urban heat island (UHI) effect; air pollution and flooding events. It is therefore considered that young people and children; older people, those with a limiting long-term illness; disabled people and people affected by social deprivation and likely to benefit from the strengthened policy approach being put forward. The Preferred Option - which would combine Options 1-4 by aiming to create habitats (Option 1); protect SINCs and reduce areas of deficiency (Option 2); set targets for increasing biodiversity value borough-wide (Option 3) and set evidence-based targets for achieving an uplift in the biodiversity value of specific areas of the borough (Option 4) - would be expected to deliver significantly greater sustainability benefits over the plan period than each of the alternative options.								
<b>ISSUE 7: STRATEGIC TRANSPORT INFRASTRUCTURE- new strategic policy</b>								
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.								
<b>DRAFT POLICY 7: Strategic Transport Infrastructure</b>			+++	+++	++		+++	
<b>LOCAL PLAN 2018: Policy 35</b>			++	++	+		++	
Subject to the necessary funding being secured from Transport for London (TfL) and other sources, <b>draft Strategic Policy Option 7 on 'Strategic Transport Infrastructure'</b> is considered to significant potential benefits in terms of promoting sustainable modes of travel and healthy streets; reducing congestion on the Borough's road network; cutting local air pollution and greenhouse emissions; promoting sustainable economic growth; supporting the transformation of the London Cancer Hub site; Sutton Link and improving rail and bus services (metroisation); enhancing access for Borough residents to key social and community infrastructure (e.g. the Royal Marsden Hospital and proposed new Special Emergency Care Hospital at Belmont). When considered together, the proposed package of strategic transport infrastructure would have significantly positive benefits for equalities target groups - such as young people and children; older people, those with a limiting long-term illness; disabled people and people affected by social deprivation - who are generally more reliant on public transport services and disproportionately affected by traffic congestion, air pollution and long-term climate impacts. This is reflected in the score given in the matrix above.								

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<b>STRATEGIC POLICIES: AREA STRATEGIES</b>								
<b>ISSUE 8: LONDON CANCER HUB - updates Policy 2 of Local Plan 2018</b>								
<p>(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.</p> <p>(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.</p> <p>(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.</p> <p>(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.</p> <p>(e) To achieve the Council's objectives, the policy framework and site allocation will: (1) 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 (2) 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 (3) Not allow open-market residential development on the site (4) 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 (5) Require tall buildings to be focused towards the centre of the overall LCH site (6) 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.</p> <p>(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. 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 proposal being in accordance with the Council's policies on design, character and appearance, heritage, and environmental protection.</p> <p>(g) 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.</p>								
<b>DRAFT POLICY 8: LONDON CANCER HUB (LCH)</b>			+++	+++	+++		+++	
<b>LOCAL PLAN 2018: Policy 2</b>			+++	++	++		++	
<p>Delivering the transformation of the LCH site as state-of-the-art life science campus specialising in cancer research, treatment, and enterprise is likely to have many positive benefits in terms of promoting a strong, sustainable and high-skilled local economy; improving transport links; attracting investment in community and social infrastructure (e.g. new SECH hospital); providing new career opportunities and promoting urban renewal. Furthermore, there is now a commitment to ensure that the redevelopment and transformation of the LCH site will accord with Sutton's Climate Emergency Action Plan objectives, including those relating to net zero carbon, Passivehaus, decentralised energy, urban greening and biodiversity net gain (BNG). The draft Policy also commits to achieving significant sustainable transport improvements to and from the site, including Sutton Link/Tramlink together with potential complementary alternative sustainable transport solutions. The results of the EqlA for Draft Policy 8 therefore indicates that that there are likely to be significant beneficial impacts for a number of equalities target groups - including those who are more reliant on public transport; those who are disproportionately affected by traffic congestion, pollution and climate impacts; those more likely to benefit from medical research and additional hospital facilities older people - such as older people; young people and children; disabled people; people with a limiting long-term illness and people affected by social deprivation</p>								
<b>ISSUE 9: SUTTON TOWN CENTRE - updates Policy 3 of Local Plan 2018</b>								
<p>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. ,</p> <p><b>New Housing</b> (a) 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&amp;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 included 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.,</p> <p><b>Retail and Town Centre Uses</b> (b) 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.,</p> <p><b>Modern Office Spaces</b> (c) 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. ,</p> <p><b>Leisure and Food and Beverage Spaces</b> (d) 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. ,</p> <p><b>Community Uses</b> (e) 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.,</p> <p><b>Transport and Sutton Link</b>(f) 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.</p> <p><b>Transforming the Gyratory</b>, (i) 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. ,</p> <p><b>Tall Buildings</b> (g) 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.,</p> <p><b>Heritage</b> (h) 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.,</p> <p><b>Infrastructure</b> (i) 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., (m) Figure 9.3 below demonstrates how these projects support and link into general policy areas and development needs.,</p>								
<b>DRAFT POLICY 9: SUTTON TOWN CENTRE</b>		+++	++	++	++		+++	
<b>LOCAL PLAN 2018: Policy 3</b>		++	+	+	+		+++	
<p><b>Draft Strategic (Area-based) Policy 9 on 'Sutton Town Centre'</b> is intended to bring about the comprehensive regeneration of Sutton Town Centre to accommodate a significant level of growth in relation to new housing; renewal of social housing estates; retail uses; office space; food and beverage space; community uses; and to support new infrastructure including transport, health, education and green and blue infrastructure. Over the long term, this is considered likely to have strongly beneficial impacts for many of the identified equalities target groups by helping to meet the local for affordable housing (whichever spatial strategy is pursued under Policy Issue 2); enhancing the vitality and viability of Sutton Town Centre; promoting economic growth; an enhanced, greener public realm; promoting urban renewal through the redevelopment of Council sites at the St Nicholas Centre, Civic Centre, Beech Tree Place and Elm Grove; safeguarding the proposed Sutton Link route and improving connections for pedestrians and cyclists. Further emphasis is provided in this updated policy to enhance the quality of the public realm, accommodate significant housing growth and provide additional community infrastructure within Sutton Town Centre by redeveloping key strategic sites (e.g. St Nicholas Centre, Civic Offices etc), transforming the gyratory, integrating blue and green infrastructure and future proofing development to enable connection to a low or zero carbon decentralised energy network in accordance with the aims of Sutton's Climate Emergency Response Plan</p>								
<b>ISSUE 10: DISTRICT CENTRES STRATEGY - updates Policy 6 of Local Plan 2018</b>								
<b>All District Centres</b>								
<p>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.</p> <p>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.</p> <p>The Council will support the delivery of better retail space and other town centre uses which meet local needs.</p> <p>The Council will enable delivery of new homes in the District Centres in accordance with the spatial strategy.</p> <p>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.</p>								

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<b>10.1 Carshalton District Centre</b>								
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;								
(g) enhance links to the surrounding open space, including the proposed nature reserve at Beddington Farmlands								
<b>DRAFT POLICY 10.1: Carshalton District Centre</b>			++	++	++		+++	
<b>LOCAL PLAN 2018: Policy 6</b>			+	+	+		++	
<b>10.2 Cheam District Centre</b>								
The Council will:								
(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								
<b>DRAFT POLICY 10.2: Cheam District Centre</b>			+	+	+		++	
<b>LOCAL PLAN 2018: Policy 6</b>			+	+	+		++	
<b>10.3 Hackbridge District Centre</b>								
The Council will:								
(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.								
<b>DRAFT POLICY 10.3: Hackbridge District Centre</b>			++	++	++		+++	
<b>LOCAL PLAN 2018: Policy 6</b>			+	+	+		++	
<b>10.4 North Cheam District Centre</b>								
(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.								
<b>DRAFT POLICY 10.4: North Cheam District Centre</b>			++	++	++		+++	
<b>LOCAL PLAN 2018: Policy 6</b>			+	+	+		++	
<b>10.5 Rosehill District Centre</b>								
(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) (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								
<b>DRAFT POLICY 10.5: Rosehill District Centre</b>			++	++	++		+++	
<b>LOCAL PLAN 2018: Policy 6</b>			+	+	+		++	
<b>10.6 Wallington District Centre</b>								
(y) 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 Roa								
(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								
(y) (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								
<b>DRAFT POLICY 10.6: Wallington District Centre</b>			++	++	++		+++	
<b>LOCAL PLAN 2018: Policy 6</b>			+	+	+		++	



	Women	Asian, Black, Mixed/ Multiple and White non-British	Older people	Young people and children	Disabled and people with a limiting long-term illness	Lesbians, gays, bisexuals and transgender (LGBTB+)	People Affected by Social Deprivation	Gypsies and Travellers
<b>10.7 Worcester Park: District Centre</b>								
(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, including 1 to 9 Windsor Road for town centre uses on the ground floor and additional residential units								
(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) The Council will 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								
<b>DRAFT POLICY 10.7: Worcester Park District Centre</b>			++	++	++		+++	
<b>LOCAL PLAN 2018: Policy 6</b>			+	+	+		++	
Overall, the <b>draft District Centres Strategy set out</b> under Policy Issue 10 will have a wide range of benefits in terms of meeting the retail, community and leisure needs of the borough's residents, promoting their vitality and viability and accommodating housing and employment growth which improves the public realm and respects the character and historic environment of each centre. Sustainable transport, healthy streets objectives, urban greening measures and improving the connectivity and accessibility of the pedestrian environment are a common thread for all seven district centres. Flood alleviation measures are more of a priority within Worcester Park and Hackbridge. Older people; young people and children; disabled people and people affected by ill-health and people affected by social deprivation are likely to experience particular benefits, since these groups are disproportionately affected by poor connectivity; poor access to transport and community facilities; climate impacts such as flooding; traffic congestion; community severance and air pollution.								
<b>ISSUE 11: WANDLE VALLEY AREA STRATEGY- updates Policy 5 of Local Plan 2018</b>								
<b>New Housing</b> (a) The Council will: <ul style="list-style-type: none"> <li>Work with developers to deliver new housing at Hackbridge Station.</li> <li>Consider appropriate redevelopment options for the land to the north of Hackbridge Station.</li> </ul>			<b>Better Transport</b> (f) The Council will: <ul style="list-style-type: none"> <li>Improve signage across the Wandle Valley.</li> <li>Seek to improve pedestrian links between Mill Green and Poulter Park.</li> <li>Beddington Lane improvements will continue to be sought as part of any proposed planning applications.</li> </ul>					
<b>New Shops</b> (b) The Council will: <ul style="list-style-type: none"> <li>Continue to promote Hackbridge as a District Centre.</li> <li>Protect shops across the Wandle Valley that serve the local residents with everyday goods.</li> </ul>			<b>Better Environment</b> (g) The Council will: <ul style="list-style-type: none"> <li>Work with Thames Water to reduce the effects of Beddington Sewage Treatment works on the environment and local area.</li> <li>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.</li> </ul>					
<b>New Employment</b> (c) The Council will: <ul style="list-style-type: none"> <li>Work with developers to deliver new, improved industrial premises at the New Mill Quarter (former Felnex site) in Hackbridge and Wandle Valley Trading Estate, Beddington Corner. Both sites will continue to be designated as Established Industrial Locations.</li> <li>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).</li> </ul>			<b>Community Initiatives</b> (h) The Council will: <ul style="list-style-type: none"> <li>Encourage community representatives to collaborate to fund local projects, in accordance with the Council's Neighbourhood Fund or local committee grants.</li> <li>Work with the Hackbridge and Beddington Corner Neighbourhood Development Group to support the delivery of projects in the adopted neighbourhood plan.</li> </ul>					
<b>New Infrastructure</b> (d) The Council will: <ul style="list-style-type: none"> <li>Continue to deliver decentralised energy to new homes.</li> <li>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.</li> <li>Support the Wandle Valley Forum to lead on securing external funding for a replacement pedestrian bridge.</li> </ul>			<b>The River Wandle</b> (i) The Council will: <ul style="list-style-type: none"> <li>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:               <ul style="list-style-type: none"> <li>Improve the water quality of the River, in particular lowering levels of phosphates and limiting sewage and road run off.</li> <li>Expand the network of walking and cycling routes including the Wandle Trail.</li> <li>Seek to improve the visual appearance and biodiversity value of the Beddington Carrier.</li> <li>Achieve good ecological potential for the River Wandle by 2027.</li> </ul> </li> </ul>					
<b>New Open Space</b> (e) The Council will: <ul style="list-style-type: none"> <li>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.</li> </ul>								
<b>DRAFT POLICY 11: Wandle Valley Area Strategy</b>	++		++	+++	+++		+++	
<b>LOCAL PLAN 2018: Policy 5</b>	+		+	++	++		++	
The draft Wandle Valley Area Strategy under Policy Issue 11 is wide ranging area-based policy with potentially significant benefits for all appraisal criteria. Subject to effective implementation and other Local Plan policies, the draft Wandle Valley Area Strategy will have significant community-wide benefits by: <ul style="list-style-type: none"> <li>promoting zero carbon standards in new development by connecting new homes to decentralised energy networks;</li> <li>flood risk management and water resources by continuing to work with the Environment Agency, Thames Water, the Wandle Valley Regional Park Trust, Groundwork London and the South East Rivers Trust to improve the water quality of the River Wandle to 'good ecological potential'(relevant to appraisal objective 2);</li> <li>open space, urban greening and biodiversity net gain (BNG) by ensuring that Beddington Farmlands is restored to become a significant new nature reserve in Wandle Valley Regional Park with high-quality habitats for common and protected species.</li> <li>sustainable transport/ healthy streets objectives and improving accessibility for pedestrians and cyclists through improved pedestrian links between Mill Green and Poulter Park, improve foot and cycle routes across the area (notably to Mitcham Junction and towards Croydon from Hackbridge) and further Beddington Lane improvements (relevant</li> <li>sustainable economic growth by delivering new, improved industrial premises at the New Mill Quarter and Wandle Valley Trading Estate, Beddington Corner and possible release of MOL for additional industrial use (need to weigh this against negative impacts on open space)</li> <li>helping to meet Borough wide needs for housing needs, including for family housing and affordable housing units, needs by working with developers to deliver new housing at Hackbridge Station and considering appropriate redevelopment options for the land to the north of Hackbridge Station.</li> </ul>								
However, a number of equalities target groups are likely to enjoy particular benefits as a result of this strategic policy. For example, promoting 'zero carbon' standards and proposed flood risk management and climate change adaptation measures will have benefits for older people; young people and children; disabled people and people affected by ill-health and people affected by social deprivation who are more vulnerable to climate impacts); the provision of family housing and affordable housing units and job opportunities will benefit people affected by social deprivation.								

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<b>MEETING SUTTON'S HOUSING NEEDS</b>											
<b>ISSUE 12: STRATEGIC HOUSING REQUIREMENTS- updates Policy 1 of Local Plan 2018</b>											
<p>(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.</p> <p>(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.</p> <p>(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.</p> <p>(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.</p> <p>(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.</p> <p>(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.</p> <p>(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.</p>											
<b>DRAFT POLICY 12: Strategic Housing Needs</b>			+++?	+++?	+++?		+++?				
<b>LOCAL PLAN 2018: Policy 1</b>			++	++	++		++				
<p>Draft Policy 12 on 'Strategic Housing Needs' is predicted to have significant beneficial impacts in terms of meeting the future local housing needs - including for affordable units - by promoting housing growth in appropriate locations across the borough. Accessibility to social and community facilities, public transport and other sustainable modes of travel will be promoted in line with sustainability principles by having regard to the site context in terms of connectivity and accessibility; and the capacity and quality of provision of surrounding infrastructure. While the exact number of new homes to be delivered over the plan period will be determined following consultation on Local Plan Issues and Preferred Options, the outcome of EqlA indicates that following a balanced approach to meeting strategic housing requirements (more aligned to the 'medium growth strategy' set out under Option B under Issue 1 above) is likely to have beneficial impacts for older people, young people, disabled people, people affected by a limiting long-term illness and people affected by social deprivation by:</p> <ul style="list-style-type: none"> <li>going further than the current development plan in meeting the need for housing (including for affordable housing) while protecting the suburban character of the borough and open space;</li> <li>supporting a mix of housing sizes, types and tenures to meet housing need including for those that require affordable housing, family sized housing, older people, and people with disabilities;</li> <li>setting out a requirement for 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.</li> </ul>											
<b>ISSUE 13: HOUSING DENSITY AND INTENSIFICATION - updates Policy 7 of Local Plan 2018</b>											
<b>13.1. General Approach to Density</b>											
<p>(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.</p> <p>(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:</p> <table border="1" data-bbox="192 1033 2338 1138"> <tr> <td><b>Option 1a - aligns with Spatial Strategy Option 1 'Sutton Town Centre'</b> - Very High Density in Sutton Town Centre and its API. - Medium Density in the District Centres and their APIs. - Low Density in Suburban Heartlands.</td> <td><b>Spatial Strategy Option 1b 'Sutton Town Centre and District Centre Network'</b> - High density in Sutton Town Centre and its API. - High to medium density in District Centre and its API. - Lower density in Suburban Heartlands.</td> <td><b>Option 1c - aligns with Spatial Strategy Option 3 'Dispersed Development'</b> - 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</td> </tr> </table> <p>(c) All development proposals should be of a high quality and close to sufficient infrastructure (existing or planned) to meet that development's needs.</p>									<b>Option 1a - aligns with Spatial Strategy Option 1 'Sutton Town Centre'</b> - Very High Density in Sutton Town Centre and its API. - Medium Density in the District Centres and their APIs. - Low Density in Suburban Heartlands.	<b>Spatial Strategy Option 1b 'Sutton Town Centre and District Centre Network'</b> - High density in Sutton Town Centre and its API. - High to medium density in District Centre and its API. - Lower density in Suburban Heartlands.	<b>Option 1c - aligns with Spatial Strategy Option 3 'Dispersed Development'</b> - 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
<b>Option 1a - aligns with Spatial Strategy Option 1 'Sutton Town Centre'</b> - Very High Density in Sutton Town Centre and its API. - Medium Density in the District Centres and their APIs. - Low Density in Suburban Heartlands.	<b>Spatial Strategy Option 1b 'Sutton Town Centre and District Centre Network'</b> - High density in Sutton Town Centre and its API. - High to medium density in District Centre and its API. - Lower density in Suburban Heartlands.	<b>Option 1c - aligns with Spatial Strategy Option 3 'Dispersed Development'</b> - 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									
<b>OPTION 1A - aligns with Spatial Strategy Option A 'STC First'</b>			+	+			+				
<b>OPTION 1B - aligns with Spatial Option B 'Sutton Town Centre and District Centre Network'</b>			++?	++?			++?				
<b>OPTION 1C - aligns with Spatial Option C 'Dispersed Development'</b>			x	x			x				
<p><b>Option 1c</b> is aligned with Spatial Strategy Option 2C 'dispersed growth' would allow significant levels of new housing to be developed within the district centres and the suburban heartlands of the Borough by allowing high to medium densities in Sutton Town Centre and its API, medium densities in each of the District Centres and their APIs and medium to low density in the suburban heartlands of the Borough. Although this approach to housing density and intensification would help to maximise housing delivery, the results of the EqlA indicate that Option 1C compares unfavourably with Options 1A and 2B in terms of its potential impact on equalities target groups. Firstly, Option 1C would lead to high levels of housing development in dispersed and less sustainable locations with poor public transport accessibility thus leading to greater reliance on the private car. It is well established that older people; young people and children (young people); disabled people and people affected by a limiting long-term illness (disabled people); and people affected by social deprivation are generally much more reliant on public transport than the general population and disproportionately affected by the negative environmental and health effects of increased traffic congestion, noise and air pollution. Secondly, Option C would restrict the ability to accommodate social and community infrastructure to support housing growth, again likely to disproportionately affect the above equalities groups. Thirdly, Option C would necessitate the strategic release of Green Belt/ MOL and other greenfield sites, negatively affecting young people in particular.</p> <p>In contrast, <b>Option 1a</b> (aligned with Spatial Strategy Option 2A 'Sutton Town Centre First' under Issue 2) would mean that the vast majority of housing development and growth (including new housing) would be accommodated in the most sustainable part of the Borough with the best public transport accessibility and access to services while ensuring that greenfield sites and the highly valued character and quality of the suburban heartlands is protected. Compared to Option 1c, there are therefore positive impacts on older people; young people and children; disabled people and people affected by a limiting long-term illness; and people affected by social deprivation since these groups are generally much more reliant on public transport than the general population and disproportionately affected by the negative environmental and health effects of increased traffic congestion, noise and air pollution. On the negative side, the delivery of fewer affordable housing units over the plan period would have adverse impacts on people affected by socio-economic deprivation. Overall, Option A has some benefits for equalities target groups compared to Option C</p> <p><b>Option 1b</b> (aligned with Spatial Strategy Option 2B 'Sutton Town and District Centre Network') represents an intermediate and more balanced policy position. This option would go further than Option A in meeting identified housing needs including for family and affordable homes and ensuring that infrastructure requirements are distributed across district centres as well as within Sutton Town Centre. As with Option A, development and growth is still delivered in sustainable locations but access to public transport and services is lower in district centres than the town centre. Unlike the dispersed growth option however (Option C), Option B would not lead to the loss of greenfield sites, strategic release of MOL/Green Belt, affect urban greening, BNG or flood risk management objectives. While this intermediate option would deliver less additional housing over the plan period than the high growth option (scoring ++), as with Option 1, there are a number of positive impacts on equalities target groups by comparison with Options A (low housing growth) and C (high housing growth). Ensuring that most new development is accommodated in the most sustainable locations with the best public transport accessibility and access to services will benefit older people; young people; disabled people; and people affected by social deprivation since these groups are much more reliant on public transport than the general population and disproportionately affected by the negative environmental and health effects of increased traffic congestion, noise and air pollution. By protecting Green Belt/ MOL and other greenfield sites across the Borough, Option B will help to mitigate the severity of summer heat-wave events and the the urban heat island (UHI) effect, which would otherwise have disproportionate effects on older people; young people; disabled people; and people affected by social deprivation.</p>											

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<b>13.2. Coverage of Areas Of Potential Intensification</b>								
(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:								
	<b>Option 2a - The London Plan Approach</b> 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.		<b>OPTION 1b - Option 2b - A Local Approach</b> 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					
<b>OPTION 2a: London Plan Approach</b>			+	+			+	
<b>OPTION 2b: A Local Approach</b>			++	++			++?	
While Option 2a (the London Plan approach to Areas of Potential Intensification -APIs) would increase the delivery of housing by extending APIs around town centres to include areas where existing or planned public transport access levels (PTALs) are within the range of 3-6 or located within 800m distance of a station or town centre boundary, much of the additional housing would be accommodated in unsustainable locations with poor public transport accessibility, relatively distant from town centre boundaries and railway stations and relatively distant from shopping and social and community facilities. This option therefore compares unfavourably with Option 2b (the Local Approach) in terms of its impacts on a number of equalities target groups, including older people; young people and children (young people); disabled people and people affected by a limiting long-term illness (disabled people); and people affected by social deprivation. These groups are generally much more reliant on public transport than the general population and disproportionately affected by the negative environmental and health effects of increased traffic congestion, noise and air pollution. Furthermore, the London Plan approach to APIs would restrict the ability to accommodate sufficient social and community infrastructure in the right locations to support housing growth and higher residential densities - again this is likely to disproportionately affect the above equalities groups.								
<b>ISSUE 14: AFFORDABLE HOUSING - updates Policy 8 of Local Plan 2018</b>								
(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 1000m <sup>2</sup> , the Council will seek on-site affordable housing. The Council considers there are three policy options to explore								
	<b>Option 1A:</b> 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		<b>Option 1B:</b> 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;		<b>Options 1C:</b> 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								
	<b>Option 2a:</b> 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			<b>Option 2b:</b> 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)								
<b>OPTION 1A: 35% Affordable</b>				+			+	
<b>OPTION 1B: 40% Affordable</b>				+			++	
<b>OPTION 1C: 50% Affordable</b>				++			+++	
Of the three options under Policy Issue 14, Option 1C (50%) sets the highest target for the provision of affordable housing units as part of residential developments of 10 units or more. By comparison with Options 1A (35%) and 1B (40%), this option would therefore be expected to deliver a higher number and proportion of affordable units and therefore have greater benefits in terms of meeting the need for affordable housing units. The outcome of the EqIA therefore indicates that Option1 C would deliver greater benefits for people affected by social deprivation and for children and young people than Options 1A or 1B.								
<b>OPTION 2A: Tenure split 70+30</b>				+			+	
<b>OPTION 2B: Tenure split 85+15</b>				+			++	
Option 2A (85%) sets the highest target for the provision of low-cost rented products, including social rent and affordable rent, and therefore scores more positively with respect to meeting housing needs The outcome of the EqIA therefore indicates that Option 2B would deliver greater benefits for people affected by social deprivation and for children and young people than Optionm 2A								



	Women	Asian, Black, Mixed/ Multiple and White non-British	Older people	Young people and children	Disabled and people with a limiting long-term illness	Lesbians, gays, bisexuals and transgender (LGTB+)	People Affected by Social Deprivation	Gypsies and Travellers																				
<b>ISSUE 15: SMALL SITES - new policy</b>																												
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/planned public transport, and the capacity and provision of infrastructure. (c) Support appropriate small site development in existing residential areas within: • 800m of Sutton Town Centre (as shown on the Policies Map) and have a PTAL rating of between 3 and 6; and • 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 final version of the 'Housing and Garden Land' policy on the acceptability of additional housing on private residential gardens																									
<b>DRAFT POLICY 15: Small Sites</b>				+	++?	+	+																					
The main impacts of draft Local Plan Policy 15 on 'Small Sites' will be in terms of its potential contribution to meeting Borough housing needs. By directing small sites towards Areas of Potential Intensification (API), this will have the effect of protecting family homes while ensuring there is no net loss of family housing overall. This policy is also assessed as having positive impacts on sustainable transport objectives and access to social and community infrastructure by including a requirement for proposals regard to site context, connectivity and accessibility by walking and cycling and existing and planned public transport accessibility (PTAL 3-6), and the capacity and provision of supporting infrastructure. The results of the EqlA therefore indicate some positive benefits for older people; young people; disabled people and people affected by a limiting long-term illness; and people affected by social deprivation are generally more reliant on public transport than the general population and disproportionately affected by the negative environmental and health effects of increased traffic congestion. The delivery of more family sized units may have potential benefits for children.																												
<b>ISSUE 16: HOUSING MIX AND HOUSING STANDARDS - updates Policy 9 of Local Plan 2018</b>																												
Housing Mix (a) [permission granted] 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. <b>Dwelling Sizes Option 1</b> (a) 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. (b) 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%. <b>Dwellings Sizes Option 2</b> (c) 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 border="1"> <thead> <tr> <th>Tenure</th> <th>1 Bedroom</th> <th>2 Bedrooms</th> <th>3 Bedrooms</th> <th>4+ bedrooms</th> </tr> </thead> <tbody> <tr> <td>Market</td> <td>10-15%</td> <td>30-35%</td> <td>35-40%</td> <td>15-20%</td> </tr> <tr> <td>Affordable Home Ownership</td> <td>30-35%</td> <td>40-45%</td> <td>15-20%</td> <td>5-10%</td> </tr> <tr> <td>Affordable Housing (Rented)</td> <td>30-35%</td> <td>30-35%</td> <td>25-30%</td> <td>5-10%</td> </tr> </tbody> </table>									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%
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(e) 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. : (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 (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.																												
<b>OPTION 1</b>				++	++	++	++																					
<b>OPTION 2</b>				+++	+++	+++	+++																					
Whichever option is pursued with respect to dwelling sizes, Policy 9 is expected to have beneficial impacts on most equalities target groups and especially older people; young people and children; disabled people and people affected by a limiting long-term illness; and people affected by social deprivation by ensuring that the proportion of family sized housing units (3+ bedrooms) is greater in areas with low public transport accessibility and by providing adequate space for play and informal recreation, meeting minimum internal space standards and in terms of providing an adequate amount of private amenity space. The results of the EqlA indicate that Option 2 would be a more effective policy approach in terms of creating mixed and balanced communities in sustainable locations and in terms of ensuring that the relative proportion of family housing units (3 or 4 bedrooms) is higher within areas of poor public transport accessibility																												
<b>ISSUE 17: LOSS OF HOUSING AND CONVERSIONS - updates Policy 10 of Local Plan 2018</b>																												
<b>Loss of Housing</b> (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. <b>Conversions</b> (c) he 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 130m <sup>2</sup> (excluding extensions, garages and loft space) (iii) The conversion of any dwelling with more than 130m <sup>2</sup> of floorspace (excluding extensions, garages and loft space) into flats provides at least one family sized dwelling (iv) The proposal has no adverse impact on the amenity of neighbouring properties (v) 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 (vi) The dwellings proposed meet the London Plan internal space standards; and (vii) The proposal does not adversely affect on-street parking																												
<b>DRAFT POLICY 17: Loss Of Housing and Conversions</b>				+++	+++	+++	+++																					
<b>LOCAL PLAN 2018: Policy 10</b>				++	++	++	++																					
Draft Local Plan Policy 17 'Loss of Housing and Conversions' now provides stronger protection against the loss of family homes compared to Policy 10 of the current Local Plan 2018 by requiring that proposed conversions of family sized homes into flats must provide a least 1 family sized unit. This will have significant benefits in terms of meeting local housing needs (by preventing its loss to other uses). Since any loss of residential units will only be acceptable if it forms 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. Ensuring that residential conversions are only permitted within APIs will also support sustainable transport objectives and ensuring greater accessibility to community infrastructure. This is reflected by the outcome of the EqlA, which indicates that there will be benefits for children and young people from preventing the loss of family units and for older people, children and young people, disabled people and people affected by social deprivation since these equalities target groups are more dependent on public transport than the general population .																												
<b>ISSUE 18: BUILD TO RENT - new policy</b>																												
(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 maximum the proportion of rents provided at a level equivalent to London Living Rent (ii) 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																												
<b>DRAFT POLICY 18: Build To Rent</b>							+++																					
Draft Local Plan Policy 18 on 'Build to Rent' builds upon Policy H11 of the London Plan by ensuring that build to rent schemes deliver minimum levels of affordable housing in line with Policy Issue 14 on Affordable Housing. With the requirement that 30% of the affordable units are provided at rents equivalent to London Living Rent level and the remainder set at genuinely affordable rents, the appraisal identifies that this policy will have significant beneficial impacts both in terms of meeting the local needs for affordable housing and in terms of creating mixed and balanced communities. This is reflected by the outcome of the EqlA, which indicates that there will be benefits for children and young people from preventing the loss of family units and for older people, children and young people, disabled people and people affected by social deprivation since these equalities target groups are more dependent on public transport than the general population																												

	Women	Asian, Black, Mixed/ Multiple and White non-British	Older people	Young people and children	Disabled and people with a limiting long-term illness	Lesbians, gays, bisexuals and transgender (LGTB+)	People Affected by Social Deprivation	Gypsies and Travellers
<b>ISSUE 19: CO-LIVING HOUSING - new policy</b>								
<b>Option 1 - A Local Approach to Co-Living Developments</b>								
(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'								
<b>Option 2 - the London Plan Approach to Co-Living Development</b>								
(d) 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'								
<b>OPTION 1: Local Approach</b>			++	+++	++		+	
<b>OPTION 2: London Plan Approach</b>			+	++	+		+?	
The Local Approach to Co-Living Developments proposed under Option 1 of Draft Policy 19 is considered to have greater benefits than the London Plan approach set out under Option 2, in terms of affordable housing provision, ensuring that co-living developments are created in sustainable locations with good access to shopping facilities and public transport, and would not be detrimental to residential amenity and to the mix and balance of communities and uses in the area. This is reflected by the outcome of the EqlA, which indicates that there will be significant benefits for people affected by social deprivation and also less significantly for those equalities target groups such as older people, children and young people and disabled people who are generally more dependent on public transport than the general population.								
<b>Issue 20: HOUSES IN MULTIPLE OCCUPATION - new policy</b>								
(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] 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								
<b>DRAFT POLICY 20: HOUSES IN MULTIPLE OCCUPATION</b>			++	++	++		+	
<b>DO NOTHING SCENARIO (i.e. NO POLICY)</b>			X	X	X		X	
By directing Houses in Multiple Occupation' (HMOs) towards town and district centre locations and resisting the loss of family homes, Policy 20 will help to ensure that such developments are only granted within sustainable locations with good access to shopping facilities and public transport (i.e. within an API); and do not lead to the loss of family housing. This is reflected by the outcome of the EqlA, which identifies that there will be benefits for those equalities target groups such as older people, young people; disabled people and people affected by social deprivation who are more dependent on public transport and further benefits for children and young people by resisting the loss of family homes								
<b>ISSUE 21: OLDER PERSONS AND SPECIALIST ACCOMMODATION- updates Policy 11 of Local Plan 2018</b>								
(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 evidence set out in the Council's most up-to-date Local Housing Needs Assessment (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.								
<b>DRAFT POLICY 21: Older Persons and Specialist Accommodation</b>			+++	++	+++		++	
<b>LOCAL PLAN 2018: Policy 11</b>			++	+	++		+	
Draft Policy 21 on Older Persons and Specialist Accommodation has a number of positive benefits in terms of meeting Borough housing needs for elderly people and others requiring supported housing. These positive benefits arise from the requirements set out in the policy to ensure that such accommodation meets an identified need based on local evidence; avoids no net loss of residential accommodation; creates dementia -friendly spaces; accords with London Plan requirements on housing standards; has good access to public transport, shops, services, and leisure facilities appropriate to the needs of occupiers and has regard to public transport accessibility levels (PTALs). This is reflected by the outcome of the EqlA, which identifies that there will be significant positive benefits for older people, disabled people and people affected by a limiting long-term illness. There are also more general benefits for those equalities target groups such as people affected by social deprivation and who are more dependent on public transport.								

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<b>ISSUE 22: GYPSY AND TRAVELLER ACCOMMODATION - updates Policy 12 of Local Plan 2018</b>									
(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 in an area at high risk of flooding. (v) The layout of the site, its facilities and landscaping will be designed to a high standard including pitches, hardstandings, amenity blocks, amenity and play spaces and boundary treatments.									
<b>DRAFT POLICY 22: Gypsy and Traveller Accommodation</b>								<b>+++</b>	
<b>LOCAL PLAN 2018: Policy 12</b>								<b>++</b>	
The outcome of the appraisal of Draft Policy 22 on Gypsy and Traveller Accommodation and the two corresponding proposed site allocations has a number of positive benefits when considered against an alternative Local Plan scenario where no environmental safeguards are included with respect to gypsy and traveller sites. The most significant positive benefit arising is in relation to equalities - since gypsies and travellers are an equalities target group - and ensuring that the future need for gypsy and traveller pitches is met over the plan period. This is reflected by the outcome of the EqlA, which identifies that there will be significant positive benefits for gypsies and travellers arising from this policy and the associated site allocation.									
<b>ISSUE 23: HOUSING AND GARDEN LAND - updates Policy 13 of Local Plan 2018</b>									
<b>Back Garden Land</b> (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.									
<b>Front Garden Land</b> (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 (i) A permeable or porous material (including for the sub-base layer) should be used (ii) The maximum amount possible of soft landscaping and/or vegetation should be retained or created									
<b>Artificial Grass in Garden Land</b> (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									
<b>DRAFT POLICY 23: Housing and Garden Land</b>			<b>++</b>	<b>++</b>	<b>++</b>		<b>++</b>		
<b>LOCAL PLAN 2018: Policy 13</b>			<b>++</b>	<b>++</b>	<b>++</b>		<b>++</b>		
The outcome of the appraisal shows that Draft Policy 23 on Housing and Garden Land will deliver a number of beneficial impacts including by continuing to providing policy protection for backgarden sites, particularly where they form a larger street block and make an important contribution to urban greening; counteracting the urban heat island (UHI) maintaining local ecological pathways; delivering biodiversity net gain (BNG) and helping to minimise flood risk. It is well understood that equalities target groups such as older people, young people and children; disabled people; people affected by a long-term illness and people affected by social deprivation are disproportionately affected by climate impacts such as the increased frequency and severity of flood events and summer heatwaves, so the benefits of Draft Policy 23 on these groups are reflected in the EqlA.									
<b>GROWING SUTTON'S EMPLOYMENT OFFER</b>									
<b>ISSUE 24: EMPLOYMENT LAND AND WASTE MANAGEMENT - updates Policy 14 of Local Plan 2018</b>									
	<b>Industrial Option 1: Conventional Intensification</b> <ul style="list-style-type: none"> <li>Continue to protect existing designated SIL and EILs.</li> <li>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"> <li>40% (current local plan standard)</li> <li>65% (London Plan standard)</li> <li>100% ELENA consideration</li> </ul> </li> <li>Develop former waste sites that have been released from waste safeguarding for industrial uses.</li> <li>Refuse applications which would result in further employment land losses.</li> <li>Not supporting co-location schemes in SILs.</li> <li>Continue DfC with neighbouring boroughs, particularly Croydon.</li> </ul>		<b>Industrial Option 2: Multi-storey Intensification</b> <ul style="list-style-type: none"> <li>Continue to protect existing designated SIL and EILs.</li> <li>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.</li> <li>Develop former waste sites that have been released from waste safeguarding for multi-storey industrial uses.</li> <li>Refuse applications which would result in further employment land losses.</li> <li>Not supporting co-location schemes in SILs</li> <li>Continue DfC with neighbouring boroughs, particularly Croydon.</li> </ul>			<b>Industrial Option 3: Intensification and New Sites</b> <ul style="list-style-type: none"> <li>Continue to protect existing designated SIL and EILs.</li> <li>Proactively support intensification of existing sites to help meet industrial need.</li> <li>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.</li> <li>Continue to explore the possibility of expanding Kimpton SIL into the adjacent supermarket site.</li> <li>Develop former waste sites that have been released from waste safeguarding for multi-storey industrial uses.</li> <li>Refuse applications which would result in further employment land losses.</li> <li>Not supporting co-location schemes in SILs</li> <li>Continue DfC with neighbouring boroughs, particularly Croydon.</li> </ul>			
<b>INDUSTRIAL OPTION 1: Conventional Intensification</b>			<b>++</b>	<b>++</b>	<b>x?</b>	<b>+</b>	<b>x?</b>		
<b>INDUSTRIAL OPTION 2: Multi-Storey Intensification</b>			<b>+</b>	<b>+</b>	<b>+</b>	<b>+</b>	<b>+</b>		
<b>INDUSTRIAL OPTION 3: Intensification and New Sites</b>			<b>x?</b>	<b>x?</b>	<b>x?</b>	<b>x?</b>	<b>++</b>		
<b>Industrial Option 1 'Conventional Intensification'</b> would ensure that employment land is protected from other uses, avoid the strategic release of Green Belt/ MOL, greenfield sites or potential housing sites for industrial uses and promote sustainable transport objectives, it would fall far short of meeting the high demand for new industrial floorspace 167,000 sq.m. (or 8,338 sq.m. per annum) or 26 hectares as identified in the Employment Land and Economic Needs Assessment (ELENA) 2023. The EqlA therefore considers that there are positive impacts for children/ young people and other equalities target groups who are more dependant on public transport but potentially negative impacts for people affected by social deprivation due to the shortfall in employment floorspace over the plan period. <b>Option 2 'Multi-Storey Intensification'</b> would help to meet the high demand for new industrial floorspace (167,000 sq.m.) and therefore have potentially beneficial impacts on promoting sustainable economic growth, building a strong and high-skilled local economy. The EqlA therefore considers that people affected by social deprivation may benefit since the level of industrial floorspace provision would be significantly higher than in the current Local Plan 2018. On the other hand, there may be greater pressures in terms of the potential need for strategic release of MOL, uptake of potential housing sites and impacts on the local road network and local air quality arising from greater HGV movements and these impacts are reflected in the results of the EqlA. <b>Industrial Option 3 'Intensification and new Sites'</b> would seek to exceed the identified high demand for new industrial floorspace 167,000 sq.m. and therefore help to promote economic growth and a strong, sustainable and high-skilled local economy (as with Option 2). While there would be benefits for people affected by social as a result of increasing access to employment opportunities, there would be negative impacts on most other equalities target groups such as older people; young people and children; disabled people and people affected by long-term illness arising from the likely release of MOL or other greenfield sites; loss of urban greening; increased traffic levels and congestion on the Borough's road network; increasing air pollution; taking up land needed for housing and/or essential community infrastructure, since these groups are disproportionately affected by climate impacts; traffic congestion and air pollution and open space deficiencies.									



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<b>ISSUE 25: INDUSTRIAL USES - updates Policy 15 of Local Plan 2018</b>								
<b>Strategic Industrial Locations, Established Industrial Locations and Other Land in Industrial Use</b>								
(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.								
<b>Other Land in Industrial Use</b>								
(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								
<b>DRAFT POLICY 25: Industrial Uses</b>			+	+	+		++	
<b>LOCAL PLAN 2018: Policy 15</b>			+	+	+		++	
Draft Policy 25 on Industrial Uses will have benefits in relation to promoting economic growth; protecting against the loss of employment land and floorspace within Strategic Industrial Locations (SILs) and Established Industrial Locations and minimising the adverse effects of HGV movements on the road network by restricting the development of trade counters. Accordingly, the EqlA identifies that there would be some benefits for people affected by social deprivation as a result of maintaining access to employment opportunities and also some positive impact on most other equalities target groups such as older people; young people and children; disabled people and people affected by long-term illness who would otherwise be disproportionately affected by the impacts of traffic congestion and air pollution.								
<b>ISSUE 26: OFFICES - updates Policy 15 of Local Plan 2018</b>								
	<b>Office Option 1: Policy to meet office floorspace in full (81,583 sq.m.)</b>			<b>Office Option 3: Policy to realise sufficient floorspace to meet forecast annual office jobs for first 10 years of Sutton Local Plan (≈ 1,860 jobs &amp; ≈ 30,000 sq.m.)</b>				
	<ul style="list-style-type: none"> <li>Acknowledges and applies the national 'floorspace to job' ratio of 12m<sup>2</sup>.</li> <li>Would identify site allocations to achieve the maximum forecast office floorspace, with a deliberate choice to allocate sites for Use Class E(g).</li> <li>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).</li> <li>The seven District Centres would also serve as identified locations for planned office floorspace (30% ≈ 24,475 sq.m.). Floorspace would be achieved through identified site allocations with specific requirements for Use Class E(g).</li> <li>The London Cancer Hub would be expected to deliver office floorspace, but this would be considered separately from the identified office floorspace need figure.</li> </ul>			<ul style="list-style-type: none"> <li>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.</li> <li>The policy target and monitoring arrangements would focus on the <u>first ten years of the new Sutton Local Plan</u>.</li> <li>Would take a permissive approach to facilitating office floorspace in Sutton Town Centre and the seven District Centres.</li> <li>Office floorspace is expected to come forward as part of mixed use development proposals.</li> <li>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).</li> <li>The London Cancer Hub would be expected to deliver office floorspace, and this would contribute towards meeting the identified office floorspace need figure.</li> </ul>				
	<b>Office Option 2: Policy to meet minimum office floorspace need (56,620 sq.m.)</b>			<b>Office Option 4: Policy to realise sufficient floorspace to meet forecast annual office jobs for first five years of Sutton Local Plan (≈ 930 jobs &amp; ≈ 15,000 sq.m.)</b>				
	<ul style="list-style-type: none"> <li>Applies a Sutton-specific 'floorspace to job' ratio of 7.4m<sup>2</sup>.</li> <li>Would identify and allocate sites to achieve the minimum forecast office floorspace, with a deliberate choice to allocate sites for Use Class E(g).</li> <li>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).</li> <li>The seven District Centres would only have a residual role in delivering planned office floorspace (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).</li> <li>The London Cancer Hub would be expected to deliver office floorspace, but this would be considered separately from the identified office floorspace need figure.</li> </ul>			<ul style="list-style-type: none"> <li>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.</li> <li>The policy target and monitoring arrangements would focus on the <u>first five years of the new Sutton Local Plan</u>.</li> <li>Would take a permissive approach to facilitating office floorspace in Sutton Town Centre and the seven District Centres.</li> <li>Office floorspace is expected to come forward as part of mixed use development proposals.</li> <li>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).</li> <li>The London Cancer Hub would be expected to deliver office floorspace, and this would contribute towards meeting the identified office floorspace need figure.</li> </ul>				
<b>OPTION 1: Meet office floorspace in full (81,583 sq.m.)</b>								
<b>OPTION 2: Meet minimum office floorspace need (56,620 sq.m.)</b>								
<b>OPTION 3: Realise sufficient floorspace to meet forecast annual office jobs for first 10 years of Plan (≈ 1,860 jobs &amp; ≈ 30,000 sq.m.)</b>								
<b>OPTION 4: Release sufficient floorspace to meet forecast annual office jobs for first 5 years of Plan (≈ 930 jobs &amp; ≈ 15,000 sq.m.)</b>								
The Council's policy approach to 'Office Development and Loss: Managing Future Office Space Development' is not considered to have any significant impacts on particular equalities target groups								

	Women	Asian, Black, Mixed/ Multiple and White non-British	Older people	Young people and children	Disabled and people with a limiting long-term illness	Lesbians, gays, bisexuals and transgender (LGTB+)	People Affected by Social Deprivation	Gypsies and Travellers
<b>ISSUE 27: TOWN CENTRES AND RETAIL - updates and combines Policies 17, 18 and 19 of Local Plan 2018</b>								
<b>HIERARCHY OF TOWN CENTRES</b>								
(a) The council has established a network and hierarchy of town centres, this is set out in <b>table 27.2</b> 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 [the proposal] will not undermine the vibrancy, vitality, and viability of the centre. 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.								
<b>Isolated shops</b>								
(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.								
<b>Sequential and impact test</b>								
(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.								
<b>Hot food takeaways</b>								
(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.								
<b>Residential development</b>								
(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.								
<b>DRAFT POLICY 27: Town Centres and Retail</b>			++	++	+		++	
<b>LOCAL PLAN 2018: Policies 17, 18 and 19</b>			++	++	+		++	
The three existing Local Plan Policies on town centres and retail have been merged into one as a result of the update of the Use Classes Order which combines most town centre and retail uses into a single class (class E) and local evidence shows that there is a significant need for food and beverage space. Draft Policy 27 is considered to have significant positive benefits on the vitality and viability of the Borough's town centres and promoting access to retail and community facilities by ensuring that town centres are the preferred locations for retail and leisure developments, and other commercial, business and service uses. There are also positive benefits both in terms of meeting Borough housing needs, by permitting residential development in town centres where it positively contributes to its role and function. Accordingly, the EqIA identifies that draft Policy 27 may have some potential benefits for people affected by social deprivation both as a result of promoting the commercial viability of the town centres and by allowing for new homes (including affordable homes) to be accommodated within town centres. Further benefits are identified for those equalities target groups such as older people; young people and children; disabled people and people affected by long-term illness who are more reliant on public transport as a result of locating community facilities in areas of high public transport accessibility..								
<b>SERVING SUTTON'S COMMUNITIES</b>								
<b>ISSUE 28: EDUCATION AND SKILLS- updates Policy 20 of Local Plan 2018</b>								
(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, WallingtonAll-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.								
<b>DRAFT POLICY 28: Education and Skills</b>				+++	+++			
<b>LOCAL PLAN 2018: Policy 20</b>				+++	+++			
By safeguarding two sites for SEND (special educational needs) provision and making a commitment to identify additional sites for new primary and secondary schools over the plan period based on an ongoing review, draft Policy 28 on Education and Skills will have significantly positive benefits in terms of promoting access to special educational needs, mainstream education, further education and adult learning facilities for Borough residents, draft Policy 28 has significant benefits for equalities and has benefits for children; children with special educational needs and young people/ students.								
<b>ISSUE 29: HEALTH AND WELL-BEING - updates Policy 21 of Local Plan 2018</b>								
(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								
<b>DRAFT POLICY 29: Health and Well-Being</b>			++	++	++		++	
<b>LOCAL PLAN 2018: Policy 21</b>			++	++	++		++	
Draft Policy 29 on Health and Well-Being will have a number of significant positive sustainability impacts in terms of maintaining and enhancing access to health facilities for Borough residents, promoting healthy lifestyles, promoting area renewal, life sciences and the Sutton Cancer Hub. The main benefits arising from this policy will arise from the policy commitment to provide additional health infrastructure to serve the general increase in population across the borough particularly in areas of deprivation dependent on NHS funding. This is likely to include the proposed development of new health/primary care facilities as part of the St Nicholas Centre site redevelopment in Sutton Town; new healthcare facilities as part of the Council's estate regeneration programme (Benhill, Elm Grove, Chaucer, Collingwood and Sutton Court estates) and a new primary care development on the St Helier Hospital site. Promoting the London Cancer Hub site as a health and life-science campus and the potential development of a new SECH hospital would also be expected to contribute to these sustainability objectives. Healthy lifestyles and sustainable transport objectives (Appraisal objectives 3 and 4) will be promoted through the proposed 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) and by promoting healthy, economic and sustainable alternatives to the car. This will therefore have strongly beneficial impacts for people with a limiting long-term illness, older people, young people and children and people affected by social deprivation (who are disproportionately affected by health issues) in terms of improving access to educational facilities within the Borough, addressing health deprivation in certain parts of the Borough, promoting healthy lifestyles. supporting the retention and improvement of facilities which promote healthy lifestyles such as leisure and open spaces (including playing pitches, allotments, and children's play spaces) throughout the borough.and will promote healthy, economic and sustainable alternatives to the car, including cycling and walking.								

	Women	Asian, Black, Mixed/ Multiple and White non-British	Older people	Young people and children	Disabled and people with a limiting long-term illness	Lesbians, gays, bisexuals and transgender (LGTB+)	People Affected by Social Deprivation	Gypsies and Travellers
<b>ISSUE 30: SOCIAL AND COMMUNITY INFRASTRUCTURE - updates Policy 22 of Local Plan 2018</b>								
<p>(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.</p> <p>(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, upgraded or is being relocated in order 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.</p> <p>(c) New social and community facilities will be encouraged on larger development schemes where there is a need.</p> <p>(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.</p>								
<b>DRAFT POLICY 30: Social and Community Infrastructure</b>	++	++	++	++	++	++	+	+
<b>LOCAL PLAN 2018: Policy 22</b>	++	++	++	++	++	++	+	+
Social infrastructure has been defined as "physical facilities for different individuals and communities that can be provided by a range of organisations (public, private and voluntary) and are generally organised by place, age or "defining group such as children or the disabled". This issue is therefore key to promoting equality of access and opportunity for equalities target groups within the Borough. Draft Policy 30 on Social and Community Infrastructure will therefore have potentially beneficial impacts for many of these groups by preserving and enhancing access to highly valued social and community infrastructure close to the communities they are intended to serve and in areas of good public transport accessibility. Certain groups within the community, such as faith groups, LGTB groups and women's organisations, regularly make use of public houses (e.g. function rooms) particularly those which are recognised as being of community value, and the shared use of premises such as halls is beneficial for children and young people's organisations such as the scouting movement.								
<b>ISSUE 31: UTILITIES AND DIGITAL INFRASTRUCTURE - updates Policy 23 of Local Plan 2018</b>								
<b>Overall Approach to Utilities and Digital Infrastructure</b>								
<p>(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.</p> <p>(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</p>								
<b>Design Considerations for Digital Infrastructure</b>								
<p>(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</p>								
<b>DRAFT POLICY 31: Utilities &amp; Digital Infrastructure</b>					+		+	
<b>LOCAL PLAN 2018: Policy 23</b>					+		+	
Draft Policy 31 on Utilities and Digital Infrastructure will have some potential benefits impacts in terms of promoting a strong, high-skill local economy and helping to facilitate sustainable housing growth over the plan period by ensuring that sufficient utilities infrastructure capacity is in place (including electricity, water, and sewage) to meet the additional demand from the development. It has potentially beneficial impacts on public health by requiring applicants to demonstrate that any telecommunications developments will operate within the International Commission on Non-Ionising Radiation Protection Guidelines for Public Exposure (impacts unchanged from Local Plan 2018)..								
<b>GREENING SUTTON</b>								
<b>Issue 32: GREEN BELT AND METROPOLITAN OPEN LAND (MOL) - updates Policy 24 of Local Plan 2018</b>								
<b>Policy Option 1: Green Belt and MOL</b>								
<p>(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.</p> <p>(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:</p> <p>(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</p> <p>(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</p> <p>(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:</p> <p>(i) not have a greater impact on the openness of the Green Belt or Metropolitan Open Land than the existing development; or</p> <p>(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 MOL</p>								
<b>Policy Option 2: Green Belt and MOL</b>								
<p>(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.</p> <p>(b) Any extensions to, alterations to and the replacement of an existing building or structure in the Green Belt or Metropolitan Open Land should</p> <p>(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</p> <p>(ii) be proportionate in relation to the existing building or structure taking into account the mass, scale and any increase in ridge height.</p>								
<b>Both Policy Options 1 and 2</b>								
<p>(a) <b>Potential Additions to Green Belt and MOL (for)</b>(1) Mellows Park (2) Queen Elizabeth Walk (3) Anton Wetlands and Westbourne Primary School (4) Collingwood Recreation Ground and Gander Green Lane Allotments (5) Seears Park and Perretts Field (6) Carshalton Park.</p> <p>(b) <b>Potential Deletions from Green Belt and MOL (for both Policy Options 1 and 2)</b>(1) Woodcote Grove House (2) Woodmansterne (Green Belt) (3) Land east of Woodmansterne Lane (Green Belt) (4) 1-3 Metcalfe Avenue, Carshalton (Green Belt) (5) Land to East of Grove Place, Woodmansterne (Green Belt) (6) Land at Jessops Way, Beddington (MOL) (7) Land west of Beddington Lane, Beddington (MOL) (8) Former Mortuary Site, Oldfields Road/Kimpton Park Way (MOL) (9) Land north of Goat Road (MOL)</p>								
<b>POLICY OPTION 1</b>			+	++	+		++	
<b>POLICY OPTION 2</b>			+	++	+		+	
Both Policy Options 1 and 2 are considered to have beneficial impacts on enhancing the provision and quality of Sutton's open environment by stating that Council will not grant planning permission for inappropriate development in the Green Belt or MOL unless other material considerations clearly outweigh the harm to the Green Belt or MOL and constitute very special circumstances and by considering six potential additions to Green Belt and MOL. However Option 1 takes a less restrictive policy approach by allowing for the development of agriculture, horticulture or animal-related businesses, outdoor sport and recreation facilities and cemeteries provided that any new buildings or structures preserve the openness of the Green Belt or MOL. There are a number of positive benefits for equalities target groups as shown in the matrix above, especially for children/ young people, older people and people affected by social deprivation. There are further benefits for people affected by social deprivation arising from Option 1 since Unlike Policy Option 2, Option 1 also allows for developments which meet an identified affordable housing need where the development would not cause substantial harm to the openness of the Green Belt or MOL.								



	Women	Asian, Black, Mixed/ Multiple and White non-British	Older people	Young people and children	Disabled and people with a limiting long-term illness	Lesbians, gays, bisexuals and transgender (LGTB+)	People Affected by Social Deprivation	Gypsies and Travellers
<b>ISSUE 33: AGRICULTURAL LAND - updates Policy 27 of Local Plan 2018</b>								
<b>DRAFT POLICY 33: Agricultural Land</b>								
<b>LOCAL PLAN 2018: Policy 27</b>								
No significant impacts are predicted for any of the identified equalities target groups.								
<b>ISSUE 34: OPEN SPACES - updates Policy 25 of Local Plan 2018</b>								
<p>(a) The Council will seek to retain the existing level of open space in the borough by:</p> <p>(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:</p> <p>(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</p> <p>(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.</p> <p>(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.</p> <p>(iii) supporting improvements, enhancements, and management that improve both quality and access to existing green spaces.</p> <p>(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.</p> <p>(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.</p> <p>(vi) supporting new high quality outdoor sports facilities to promote sports and recreation across the borough.</p> <p>(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.</p> <p>(viii) resisting development on allotments, unless it can be demonstrated that:</p> <p>(1) they are no longer needed to meet local demand.</p> <p>(2) existing allotment users can be relocated to a new or existing allotment site within a reasonable distance of their homes.</p> <p>(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.</p> <p>(c) The Council will safeguard sufficient land required to meet the borough's future need for burial space over the plan period</p>								
<b>DRAFT POLICY 34: Open Spaces</b>			++	++	++		++	
<b>LOCAL PLAN 2018: Policy 25</b>			++	++	++		++	
Draft Policy 34 on Open Spaces will maintain the current strong policy protection against the development of all open space and play space within the Borough, including designated Public Open Space and Urban Green Space and smaller areas of open space of recreational and amenity value.. This draft policy will also help to promote walking and cycling linkages within and between areas of green chain; a network of high quality, accessible and interconnected open spaces based around the River Wandle and the Regional Park and encourage and support the provision of community-run and managed allotments and community food growing spaces in major new developments where practicable. By maintaining and enhancing green infrastructure throughout the borough and green space linkages both at a local and strategic scale, draft Policy 34 will help to mitigate many of the adverse impacts of climate change on human health and well being, including summer heatwaves, the urban heat island (UHI) effect and flooding. The EqIA therefore indicates that there will be beneficial impacts on those equalities target groups who are relatively more vulnerable to climate impacts including young people and children; older people; people affected by a limiting long-term illness and people affected by social deprivation.								
<b>ISSUE 35: BLUE AND GREEN INFRASTRUCTURE - new policy</b>								
<p>(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.</p> <p>(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</p> <p><b>Preferred Option 1:</b> Green space factor (GSF) requirement applies to all new-build residential developments creating at least one dwelling and all major commercial developments.</p> <p><b>Option 2:</b> GSF requirement applies to major residential and commercial developments only</p> <p>(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 Council's minimum SuDS performance standards set out in Policy Issue 45</p> <p>(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 4</p>								
<b>PREFERRED OPTION 1: GSF for all new-build resi. developments creating at least 1 dwelling and all major commercial developmnt</b>			+++	+++	++		+++	
<b>OPTION 2: GSF for major residential and commercial major developments only</b>			++	++	+		++	
This is proposed to be a new policy. By taking forward and building upon the Council's existing policy requirement for proposed developments to incorporate urban greening measures as an integral part of their design and layout, draft Policy 35 on Blue and Green Infrastructure is considered to have positive impacts on delivering climate resilient communities; counteracting the urban heat island (UHI) effect and overheating during summer heatwaves, biodiversity net gain (BNG), sustainable drainage (SuDS), healthy streets, air quality and local amenity. By maximising the role of blue and green infrastructure networks in mitigating the adverse effects of climate change, positive benefits are identified for a number of equalities target groups who are disproportionately affected by climate impacts, such as the elderly, people in poor health, people affected by social deprivation and living in poor housing and children. Option 1 goes further than Option 2 by requiring all new-build residential developments creating at least one dwelling and all major commercial developments to meet the Council's minimum green space factor (GSF) standards, whereas Option 2 only applies the GSF requirement to major residential and commercial developments only. The advantages of Option 1 over Option 2 for a range of climate adaptation and quality of life objectives are reflected in the scores awarded in the EqIA matrix.								
<b>ISSUE 36: NATURE CONSERVATION SITES AND GREEN CORRIDORS - updates Policy 26 of Local Plan 2018</b>								
<p>(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:</p> <p>(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.</p> <p>For SINC boundaries and green corridors see the Local Plan Appendix 6 and Policies Map</p>								
<b>DRAFT POLICY 36: Nature Conservation Sites and Green Corridors</b>			++	++	+		++	
<b>LOCAL PLAN 2018: Policy 26</b>			++	++	+		++	
By supporting developments that contribute towards urban greening objectives and borough targets for habitat creation (see Policy Issue 6 on 'Biodiversity and Habitats') and by preventing developments which would have adverse impacts on the nature conservation value or integrity of a SINC; the function of a green corridor as both as an ecological pathway and as part of the borough's wider green space network; or back garden land where it is considered to be of local ecological value, draft Policy 36 on Nature Conservation Sites and Green Corridors is considered to have beneficial impacts in relation to wider urban greening objectives as well as for habitats and biodiversity. By helping to promote green infrastructure networks and ecological pathways throughout the Borough, positive benefits are identified for a number of equalities target groups who are disproportionately affected by climate impacts, such as the elderly, people in poor health, people affected by social deprivation and living in poor housing and children.								

	Women	Asian, Black, Mixed/ Multiple and White non-British	Older people	Young people and children	Disabled and people with a limiting long-term illness	Lesbians, gays, bisexuals and transgender (LGTB+)	People Affected by Social Deprivation	Gypsies and Travellers
<b>ISSUE 37: BIODIVERSITY NET GAIN - updates Policy 26 of Local Plan 2018</b>								
(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: <ul style="list-style-type: none"> <li>(i) impacts less than 25m<sup>2</sup> of habitat or 5m of linear habitat on the existing site and does not impact a priority habitat;</li> <li>(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</li> <li>(iii) is a residential extension or otherwise classified as householder development.</li> </ul>								
	<b>Preferred Option 1:</b> Set a 20% BNG target for all development sites within the borough.	<b>Option 2:</b> Set a 10% BNG target for all development sites within the borough.	<b>Option 3:</b> Set a 20% BNG target for development 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	<b>Option 4:</b> Where wider area-based BNG targets have been established in parts of the borough which are currently deficient or score zero biodiversity units (per hectare), set the BNG site target accordingly to achieve the necessary uplift in biodiversity value				
(b) All planning applications subject to the BNG requirement set out under part (a) must be accompanied by: <ul style="list-style-type: none"> <li>(i) a statement as to whether the applicant believes that planning permission, if granted, would be subject to BNG;</li> <li>(ii) the pre-development biodiversity value of the site based on the Statutory Metric including the completed calculation tool and the publication date; and</li> <li>(iii) a plan showing on-site habitat existing on the date of submission including any irreplaceable habitat.</li> </ul> (c) Where .. permission is granted, the Council will apply the standard biodiversity gain condition where relevant to require the submission and approval of a BNG 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....			<ul style="list-style-type: none"> <li>...(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.</li> <li>(d) The Council will: <ul style="list-style-type: none"> <li>(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;</li> <li>(ii) assess biodiversity gain plans on a case-by-case basis to determine the 'best ecological outcome';</li> <li>(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 monitor the delivery of BNG across the borough and report every 5 years.</li> </ul> </li> </ul>					
<b>PREFERRED OPTION 1: 20% target for all sites in borough.</b>			+++	+++	++		+++	
<b>OPTION 2: 10% target for all sites n the borough</b>			++	++	+		++	
<b>OPTION 3: 20% target for town centres and APIs and within SILs. 10% elsewhere</b>			++	++	+		++	
<b>OPTION 4: BNG site targets to achieve the necessary uplift in biodiversity value where wider area-based BNG targets have been established (units per ha).</b>			++?	++?	+?		++?	
All four alternative options set out under Policy Issue 37 on Biodiversity Net Gain (BNG) are identified as strongly beneficial impacts in terms of creating and enhancing biodiversity and habitats throughout the Borough (as measured through the Government's Statutory Metric); urban greening; blue and green space networks; flood resilience and flood risk management, air quality, and climate justice. While delivering at least a 10% uplift in BNG as part of new developments is the primary objective of this policy, the wider benefits in terms of urban greening and climate adaptation/ resilience will deliver positive benefits for a number of equalities target groups who are disproportionately affected by climate impacts, such as the elderly, people in poor health, people affected by social deprivation and living in poor housing and children. However, by setting a more ambitious BNG target of 20% throughout the Borough, Preferred Option 1 would have the more strongly beneficial impacts provided that the viability of this policy can be demonstrated.								
<b>ISSUE 38: CHARACTER AND DESIGN - updates Policy 28 of Local Plan 2018</b>								
<b>Design-led approach to Development</b>			<b>Public Realm</b>					
(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.			(c) Opportunities for the removal of poor townscape and its replacement by development of an improved quality and scale will be pursued					
<b>General Design Principles</b>			(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.					
(b) The Council will grant planning permission for new development, including new buildings, alterations and extensions, provided the new ..... (vii) Makes a positive contribution to the street frontage, streetscene and / or public realm, including the provision and maximisation of active frontages where appropriate (viii) Is inclusive and accessible for all and improves movement through areas with direct and clear routes to deliver and facilitate high quality placemaking (ix) Is secure and designed to minimise crime and anti-social behaviour (x) Is robust and flexible in use (xi) Responds to natural features and retains trees, hedges and other landscape features and spaces of amenity value, where possible (xii) Promotes sustainable travel and, where possible is not dominated by car and cycle parking (xiii) Creates attractive, functional and clearly defined public and private spaces (xiv) Protects important local views and creates new ones wherever possible (xv) Successfully delivers building services and operating facilities and equipment subtly within the design (xvi) Seeks to introduce public art in town centres and as part of large-scale redevelopment schemes, where appropriate (xvii) 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 (xviii) 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 (i) Maintains the setting and visual amenity of the Green Belt, Metropolitan Open Land, Public Open Space and Urban Green Space.			<b>Landscaping and Trees</b>					
			(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 (ii) Incorporate well-designed soft and hard landscaping.					
			(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 existing habitat, 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. Younger trees 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 (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.					
			<b>Advertisements (not relevant)</b>					
<b>DRAFT POLICY 38: Character And Design</b>			+++	+++	+++	+++	+++	+++?
<b>LOCAL PLAN 2018: Policy 28</b>			++	++	++	++	++	++?
By promoting development proposals which are design-led, attractive, incorporate well-designed soft and hard landscaping and are informed by the Borough Character Study, Draft Policy 38 on Character and Design will have strongly beneficial impacts on a wide range of sustainability objectives as identified in the sustainability appraisal (SA) report. These include promoting designs and layouts which create enhanced public space and green infrastructure; which promote sustainable urban drainage measures (SuDS) and which create climate resilient communities. This is reflected in the outcome of the EqIA., By promoting sustainable and active modes of transport such as cycling and walking and reducing car dominance; recognising the important role of green infrastructure and soft landscaping in addressing climate impacts; mitigating local air pollution, promoting SuDS, positive benefits are predicted for all equalities target groups, including those who are likely to be more vulnerable to the impacts of climate change (older people, children, people with a limiting long-term illness and people affected by social deprivation), and groups who are likely to be more vulnerable to crime or the fear of crime (e.g. women, BME/faith groups and the LGTB community).								

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<b>ISSUE 39: TALL BUILDINGS - new stand-alone policy (currently covered in Policy 28 of the Local Plan 2018)</b>								
DRAFT POLICY 39: Tall Buildings								
LOCAL PLAN 2018: Policy 28 (part q)								
No significant impacts are predicted for any of the identified equalities target groups.								
<b>ISSUE 40: PROTECTING AMENITY- updates Policy 29 of Local Plan 2018</b>								
(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								
DRAFT POLICY 40: Protecting Amenity	?	?	+	+	+	?	+	
LOCAL PLAN 2018: Policy 29	?	?	+	+	+	?	+	
By taking consideration of the potential impacts of odours, smoke, fumes & dust on adjoining or nearby properties, and the need for safe and secure access, Draft Policy 40 Protecting Amenity would have some benefits for older people, children, people with a limiting long-term illness and people affected by social deprivation								
<b>ISSUE 41: HERITAGE- updates Policy 30 of Local Plan 2018</b>								
DRAFT POLICY 41: Heritage								
LOCAL PLAN 2018: Policy 30								
No significant impacts are predicted for any of the identified equalities target groups.								
<b>ISSUE 42: CARBON AND ENERGY- updates Policy 31 of Local Plan 2018</b>								
<b>Preferred Policy Option 1: Absolute energy performance targets</b>								
<ul style="list-style-type: none"> <li><b>Net Zero Carbon</b>All residential developments involving the creation of at least one self-contained dwelling and all non-residential developments &gt; 1,000 m<sup>2</sup> GFA must be supported by an Energy Assessment and demonstrate net zero carbon standards in operation in line with the emerging UK industry definition.</li> <li><b>Use of gas boilers</b>No gas boilers or any other fossil fuels are permitted on-site.</li> <li><b>Heating demand</b>Space heating demand for all buildings is limited to &lt;15kWh/m<sup>2</sup> per year.</li> <li><b>Energy use intensity (EUI)</b> Energy use intensity (EUI) standards are set for the following different types of residential and non-residential buildings: Terraced house: EUI &lt; 35 kWh/m<sup>2</sup> per year; low-rise apartment building: EUI &lt; 35 kWh/m<sup>2</sup> per year;mid-rise apartment building: EUI &lt; 35 kWh/m<sup>2</sup> per year;high-rise apartment building: EUI &lt; 35 kWh/m<sup>2</sup> per year;office building: EUI &lt; 70 kWh/m<sup>2</sup> per year;primary school building: EUI &lt; 65 kWh/m<sup>2</sup> per year;industrial building: EUI &lt; 35 kWh/m<sup>2</sup> per year;hotel EUI: &lt; 160 kWh/m<sup>2</sup> per year;</li> <li><b>Renewable energy generation</b> Where feasible, on-site renewable energy generation must match EUI or be greater than &gt;35 kWh/m<sup>2</sup> per year to achieve a balance with energy use.</li> <li><b>Embodied carbon</b> Upfront embodied carbon associated with demolition and building materials used for construction must be considered.</li> <li><b>Thermal bridging</b> Assured energy performance is required (e.g. 'accredited construction details' for minimising thermal bridging).</li> <li><b>Energy offsetting</b> Energy offsetting is used as a last resort in order to achieve net zero carbon, rather than carbon offsetting.</li> </ul>								
<b>Policy Option 2: Reducing CO<sub>2</sub> emissions compared to Part L 2021</b>								
<ul style="list-style-type: none"> <li><b>Percentage reduction compared to Part L 2021</b> 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<sub>2</sub> emissions for the proposed building compared to a 'notional' Part L 2021 compliant building.</li> <li><b>Calculation of baseline emissions and use of SAP/SBEM</b>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.</li> <li><b>On-site emissions reduction targets against Part L 2021:</b> 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: 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;industrial building - 45% reduction on Part L 2021;hotel - 10% reduction on Part L 2021.</li> <li><b>Fabric energy efficiency (step 1: be lean)</b> 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;</li> <li><b>Carbon offsetting</b> 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.</li> <li><b>Exclusion of unregulated emissions</b> Excludes 'unregulated' emissions from embodied and whole-life carbon and relies significantly on carbon offsetting to achieve zero carbon.</li> </ul>								
<b>Policy principles common to Preferred Policy Option 1 and Policy Option 2</b>								
<ul style="list-style-type: none"> <li>All residential and non-residential developments must minimise on-site CO<sub>2</sub> emissions through application of the Mayor's energy hierarchy (be lean; be clean; be green; be seen).</li> <li>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;</li> <li>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));</li> <li>All householder developments such as residential extensions, loft conversions and outbuildings are exempt from the net zero carbon requirement;</li> <li>Simplified energy assessment reporting requirements are set for single dwellings and minor non-residential developments under 1,000 m<sup>2</sup> GIA;</li> <li>The zero carbon requirement applies to changes of use, conversions and major refurbishments as well as to new builds;</li> <li>A whole life carbon (WLC) assessment must be undertaken for major developments in accordance with Mayoral Guidance on WLC Assessments 2020;</li> <li>All major commercial developments must achieve an 'Excellent' rating under the Building Research Establishment Environmental Assessment Method (BREEAM).</li> </ul>								
PREFERRED OPTION 1: Absolute Energy Targets			+++	+++	++		+++	
OPTION 2: Reducing Emissions On Part L 2021			++	++	++?		++	
LOCAL PLAN 2018: Policy 31			+	+	+		+	
Both Preferred Policy Option 1 (Absolute Energy Performance Targets) and Policy Option 2: Reducing CO <sub>2</sub> Emissions Compared to Part L 2021 are considered to have significantly greater benefits in terms of addressing the causes of climate change and reducing carbon dioxide (CO <sub>2</sub> ) from new and refurbished buildings compared to Policy 31 of the existing Local Plan 2018 on 'carbon and energy' This is because both policy options would seek to require 'net zero' carbon standards to be delivered for all residential developments and for all commercial developments under 1,000 GFA, rather than setting this requirement for major developments only as is currently the case. However it is considered that the Preferred Option 1 (Absolute Energy Performance Targets) is likely to be more effective and go significantly further in minimising greenhouse emissions from the built environment by comparison with Option 2. This is primarily because Preferred Option 1 goes beyond regulated emissions and takes embodied and 'whole-life' carbon into account as well as energy used for heating, lighting ventilation and power. Secondly, by ruling out gas boilers, setting absolute targets for energy use intensity (EUI) and space heating demand and ensuring that renewable energy generation is maximised and matched to energy demand, Option 2 is likely to be more effective in achieving true 'net zero' carbon standards. The EqlA scores reflect the fact that climate mitigation measures and creating more energy efficient buildings will have benefits for a range of equalities target groups, particularly those who are disproportionately affected by climate impacts, such as children and young people.								



	Women	Asian, Black, Mixed/ Multiple and White non-British	Older people	Young people and children	Disabled and people with a limiting long-term illness	Lesbians, gays, bisexuals and transgender (LGTB+)	People Affected by Social Deprivation	Gypsies and Travellers
<b>ISSUE 43: OVERHEATING AND COOLING - updates Policy 33 of Local Plan 2018</b>								
<p>(a) All development proposals must seek to minimise the adverse impacts of summer heatwaves and mitigate the UHI 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.</p> <p>(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 ;</p> <p>(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.</p> <p>(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</p>								
<b>DRAFT POLICY 43: Overheating and Cooling</b>			+++	+++	++		+++	
<b>LOCAL PLAN 2018: Policy 33</b>			++	++	+		++	
By requiring development proposals to incorporate urban greening measures to minimise the adverse impacts of summer heatwaves and the urban heat island effect (UHI); undertake a Good Homes Alliance Early Stage Overheating Risk Tool at the pre-application stage and undertake dynamic overheating modelling in line with CIBSE TM59 and TM49; draft Policy 43 on Overheating and Cooling is considered to have significantly beneficial impacts in terms of climate adaptation and mitigation objectives; human health and well-being; climate justice (for equalities target groups who are more vulnerable to climate impacts); the quality of the Borough's built environment and urban greening. While some elements of existing Local Plan 2018 policies have been taken forward, this is a new policy which is more fully aligned with Mayoral Energy Assessment Guidance and current best practice. It should be noted that this policy does not cover the role of blue and green infrastructure measures at the site, neighbourhood or Borough-wide scale in counteracting overheating during summer heatwaves and contribution towards the urban heat island (UHI) effect, as this is covered under issue 35 on 'Blue and Green Infrastructure' (see above). These significant beneficial effects of human health and well-being are reflected in the outcome of the EqlA, which considers that draft Policy 43 will have long-term, benefits for those equalities target groups who are more vulnerable to the adverse impacts of climate change, such as the increased frequency and severity of heatwaves, air pollution events and flooding. These groups include young people and children, older people, those with a limiting long-term illness and people affected by social deprivation.								
<b>ISSUE 44: FLOOD RISK MANAGEMENT AND RESILIENCE - updates Policy 32 (a) of Local Plan 2018</b>								
<p>(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 25m<sup>2</sup> as appropriate, and that residual risks are managed in accordance with national guidance on flood resistance and resilience measures and the 'property flood resilience code of practice' published by CIRIA.</p> <p>(b) All planning applications meeting one or more of the following criteria .. must be accompanied by a site-specific 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 Report. • Proposed changes of use which both increase the development's vulnerability classification and which are in FZs 2, 3 or 3b and/or an area at higher risk of surface water flooding as identified in Sutton's SFRA Level 1 Report.</p> <p>(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.</p> <p>(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.</p> <p>(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</p>								
<b>DRAFT POLICY 44: Flood Risk Management &amp; Resilience</b>			++	++	+		++	
<b>LOCAL PLAN 2018: Policy 32a</b>			++	++	+		++	
Draft Policy 44 on Flood Risk Management and Resilience is considered to have significantly beneficial impacts in terms of flood risk management; various climate adaptation and resilience objectives; human health and well-being; climate justice the quality of the Borough's built environment and urban greening. This draft policy retains and carries forward those aspects of Policy 32 of the existing Local Plan 2018 dealing with flood risk management and resilience where flood risks from fluvial, surface water or groundwater sources are affecting the proposed development, sustainable urban drainage (SuDS) - where the principal aim is to mitigate surface water flood running off from a proposed development onto adjacent land uses - is now addressed in a separate Policy (see draft Policy 45 below). The EqlA therefore identifies significant beneficial impacts for those equalities target groups who are inherently more vulnerable to the impacts of fluvial, surface water, groundwater and sewer flooding. These include young people and children, older people and those with a limiting long-term illness.								
<b>ISSUE 45: SUSTAINABLE URBAN DRAINAGE (SuDS) - updates Policy 32 (b) of Local Plan 2018</b>								
<p>(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).</p> <p>(b) All planning applications involving the creation of (i) at least one net additional dwelling (ii) at least 1,000m<sup>2</sup> 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) (ix) 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'.</p> <p>For surface water flooding extents, surface water catchments and identified surface water flooding hotspots see the Local Plan Appendix and Policies Map.</p>								
<b>DRAFT POLICY 45: SuDS</b>			++	++	+		++	
<b>LOCAL PLAN 2018: Policy 32b</b>			++	++	+		++	
Draft Policy 45 on SuDS is considered to have significantly beneficial impacts in terms of flood risk management; climate adaptation and resilience objectives; human health and well-being; climate justice the quality of the Borough's built environment and urban greening. This draft policy retains and carries forward those aspects of Policy 32 of the existing Local Plan 2018 dealing with flood risk management and resilience where flood risks from fluvial, surface water or groundwater sources are affecting the proposed development, flood risk management and resilience is now addressed in a separate Policy (see draft 44 above). The EqlA therefore identifies significant beneficial impacts for those equalities target groups who are inherently more vulnerable to the impacts of fluvial, surface water, groundwater and sewer flooding. These include young people and children, older people and those with a limiting long-term illness.								

	Women	Asian, Black, Mixed/ Multiple and White non-British	Older people	Young people and children	Disabled and people with a limiting long-term illness	Lesbians, gays, bisexuals and transgender (LGBTB+)	People Affected by Social Deprivation	Gypsies and Travellers				
<b>ISSUE 46: BASEMENTS - new policy</b>												
<p>(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.</p> <p>(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.</p> <p>(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.</p> <p>(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.</p> <p>(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; (iii) 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; (iv) details of any proposed flood resistance, resilience or mitigation measures, such as underground corridors with high permeability or sub-surface drainage systems(v) 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(vi) 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.</p> <p>For Environment Agency Flood Zones see the Local Plan Appendix and Policies Map.</p>												
<b>DRAFT POLICY 46: BASEMENTS</b>			+	+			+					
<b>'DO NOTHING' SENARIO (no policy on basements)</b>			X	X			X					
<p>Draft Policy 46 on Basements is a new policy designed to ensure that all proposed basements are accompanied by a basement impact assessment (BIA) which includes details of flood resistance, resilience or mitigation measures and evidence to demonstrate that it will not be impacted by flooding from any source during the design flood event and 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. This is therefore assessed as having beneficial impacts in terms of flood risk management; climate resilience; urban greening; equalities and climate justice. This policy can also enable new basement dwellings to proceed, therefore having some benefit for housing provision. This is a new policy since there is no policy to deal with basements and basement impact assessments (BIAs) in the current Local Plan. Beneficial impacts are therefore identified for those equalities target groups who are generally more vulnerable to the impacts of fluvial, surface water, groundwater and sewer flooding. These include young people and children, older people and those with a limiting long-term illness.</p>												
<b>ISSUE 47: AIR QUALITY- updates Policy 34 (parts d, e and f) of Local Plan 2018</b>												
<p>(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 (NO<sub>2</sub>) or particulates (PM10 and PM2.5) ; or create an unacceptable risk of high levels of exposure to poor air quality.</p> <p>(b) All development proposals must be at least 'Air Quality Neutral' with respect to NO<sub>2</sub> 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:</p> <ul style="list-style-type: none"> <li>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;</li> <li>the Transport Emissions Benchmark (TEB) in Table 4.1 of the LPG – emissions from private vehicles travelling to and from the development.</li> </ul> <p>(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<sub>x</sub> 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.</p> <p>(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</p> <table border="1"> <tr> <td><b>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</b></td> <td><b>Policy Option 2 - Air Quality Positive standards for large-scale developments only</b></td> </tr> <tr> <td> <ul style="list-style-type: none"> <li>All planning applications which are referable to the Mayor</li> <li>All large-scale proposals requiring Environmental Impact Assessment (EIA)</li> <li>All large scale proposals which are the subject of a planning brief;</li> <li>All major development proposals located within Air Quality Focus areas.</li> </ul> </td> <td> <ul style="list-style-type: none"> <li>All planning applications which are referable to the Mayor</li> <li>All large-scale proposals requiring Environmental Impact Assessment (EIA)</li> <li>All large scale developments which are the subject of a planning brief; and</li> </ul> </td> </tr> </table> <p>(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</p> <ul style="list-style-type: none"> <li>the most significant sources of existing air pollution in the area and constraints;</li> <li>proposed design measures to minimise polluting emissions, improve air quality and reduce exposure, particularly for vulnerable groups;</li> <li>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';</li> <li>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;</li> <li>cumulative impacts from other committed developments in the vicinity</li> <li>demonstrate that the relevant BEB and TEB benchmarks for NO<sub>2</sub> and particulates set out in the Mayor's Air Quality Neutral or Air Quality Positive LPG as appropriate.</li> </ul> <p>(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</p>									<b>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</b>	<b>Policy Option 2 - Air Quality Positive standards for large-scale developments only</b>	<ul style="list-style-type: none"> <li>All planning applications which are referable to the Mayor</li> <li>All large-scale proposals requiring Environmental Impact Assessment (EIA)</li> <li>All large scale proposals which are the subject of a planning brief;</li> <li>All major development proposals located within Air Quality Focus areas.</li> </ul>	<ul style="list-style-type: none"> <li>All planning applications which are referable to the Mayor</li> <li>All large-scale proposals requiring Environmental Impact Assessment (EIA)</li> <li>All large scale developments which are the subject of a planning brief; and</li> </ul>
<b>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</b>	<b>Policy Option 2 - Air Quality Positive standards for large-scale developments only</b>											
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<b>PREFERRED OPTION 1: Air Quality Positive standards for large-scale developments and in Air Quality Focus Areas.</b>			+++	+++	++		++					
<b>OPTION 2: Air Quality Positive standards for large-scale developments only</b>			++	++	+		+					
<p>Draft Policy 47 on Air Quality is expected to have significantly beneficial impacts on local air quality within the Borough by requiring development proposals to be at least 'Air Quality Neutral' with respect to NO<sub>2</sub> emissions and particulates (PM10 and PM2.5) as defined by the Mayor's Air Quality Neutral LPG 2023 and going beyond this minimum level of performance to deliver 'air quality positive' standards for larger scale developments located within Air Quality Focus Areas. The beneficial impacts of Preferred Policy Option 1 are considered to be greater than those predicted for Policy Option 2, since Preferred Policy Option1 would extend the 'air quality positive' requirement to all planning applications referable to the Mayor; all large-scale proposals requiring Environmental Impact Assessment (EIA); all large scale proposals which are the subject of a planning brief; and all major development proposals located within Air Quality Focus areas. The EqIA results indicate that draft Policy 47 will have strongly beneficial impacts on the health and well-being of those equalities target groups who are more vulnerable to the impacts of air pollution such as young children; older people; disabled people; people those with a limiting long-term illness and top some extent people affected by social deprivation. These benefits will be more extensive if Preferred Option 1 is pursued.</p>												
<b>ISSUE 48: CONTAMINATED LAND - updates Policy 34 (parts g, h and i) of Local Plan 2018</b>												
<p>(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.</p> <p>(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</p> <p>(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.</p>												
<b>DRAFT POLICY 48: Contaminated Land</b>			+	+	+		+					
<b>LOCAL PLAN 2018: Policy 34</b>			+	+	+		+					
<p>Draft Policy 48 on Contaminated Land carries forward the relevant part of Policy 34 in the current Sutton Local Plan 2018 dealing with soil contamination without any significant changes. The outcome of the EqIA reflects the fact that a number of equalities target groups might be more at risk from the potential adverse health impacts arising from a failure to remediate contaminated sites prior to development. Minor Positive impacts are therefore predicted for young people and children, older people, those with a limiting long-term illness and people affected by social deprivation.</p>												

	Women	Asian, Black, Mixed/ Multiple and White non-British	Older people	Young people and children	Disabled and people with a limiting long-term illness	Lesbians, gays, bisexuals and transgender (LGTB+)	People Affected by Social Deprivation	Gypsies and Travellers
<b>ISSUE 49: NOISE AND VIBRATION - updates Policy 34 (parts j and k) of Local Plan 2018</b>								
<p>(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.</p> <p>(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.</p> <p>(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.</p> <p>(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</p>								
<b>DRAFT POLICY 49: Noise and Vibration</b>			+	+	+		+	
<b>LOCAL PLAN 2018: Policy 34</b>			+	+	+		+	
Draft Policy 48 on Noise and Vibration carries forward the relevant part of Policy 34 in the current Sutton Local Plan 2018 without any significant changes. The outcome of the EqlA reflects the fact that a number of equalities target groups may be more affected by environmental noise impacts arising from a failure to remediate contaminated sites prior to development. Minor positive impacts are therefore predicted for young people and children, older people, those with a limiting long-term illness and people affected by social deprivation.								
<b>ISSUE 50: LIGHT POLLUTION - updates Policy 34 (parts l and m) of Local Plan 2018</b>								
<p>(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;</p> <p>(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 2021 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.</p> <p>(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</p>								
<b>DRAFT POLICY 50: Light Pollution</b>								
<b>LOCAL PLAN 2018: Policy 34 - part</b>								
No significant impacts are predicted for any of the identified equalities target groups.								
<b>ISSUE 51: CONSTRUCTION IMPACTS- updates Policy 34 (parts n and o) of Local Plan 2018</b>								
<p>(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 (CO<sub>2</sub>) emissions and biodiversity on nearby sensitive receptors arising from demolition; earthworks; construction; trackout; and use of non-road mobile machinery (NRMM).</p> <p>(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:</p> <ul style="list-style-type: none"> <li>a commitment to prepare an Air Quality and Dust Management Plan (AQDMP) for Council approval prior to commencement</li> <li>identify and summarise the risk to human health, quality of life and the natural environment from demolition, earthworks, construction and trackout activities;</li> <li>identify the risk category of the site and recommended emissions control measures</li> </ul> <p>(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</p> <p>(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</p> <p>(e) All major developments must achieve Considerate Constructors' Scheme certification</p>								
<b>DRAFT POLICY 51: Construction Impacts</b>			+	+	+		+	
<b>LOCAL PLAN 2018: Policy 34 - part</b>			+	+	+		+	
Draft Policy 51 on Construction Impacts carries forward the relevant part of Policy 34 in the current Sutton Local Plan 2018 and strengthens the council's policy approach in some areas.. While there are positive benefits for the community as a whole from strengthened requirements on developers to incorporate appropriate mitigation measures to minimise or avoid the adverse impacts of air pollution, dust, odour, noise, vibration, water pollution, soil contamination, carbon dioxide (CO <sub>2</sub> ) emissions and biodiversity on nearby sensitive receptors arising from demolition; earthworks; construction; trackout; and use of non-road mobile machinery (NRMM), the outcome of the EqlA reflects the fact that a number of equalities target groups may be disproportionately affected by these factors in the absence of appropriate mitigation.								
<b>ISSUE 52: TRANSPORT PROPOSALS - updates Policy 35 of Local Plan 2018</b>								
<p>(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.</p> <p>(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.</p> <p>(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 the 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.</p>								
<b>DRAFT POLICY 52: Transport Proposals</b>			++	++	+		++	
<b>LOCAL PLAN 2018: Policy 35</b>			++	++	+		++	
Draft Policy 52 on Transport Proposals takes forward the Mayor's 'Healthy Streets' approach as set out in Policy T2 of the London Plan and subsequently carried forward in the Borough Sustainable Transport Strategy 2021 in order to deliver a wide range public realm and other improvements that support walking, cycling and the use of public transport; safeguard land for transport and freight infrastructure enhancements to meet the demands arising from future housing and economic growth. When considered together, the proposed package of proposed strategic and local transport schemes would have a number of positive benefits in terms of promoting sustainable forms of transport such as walking and cycling, reducing reliance on the private car, reducing air pollution and providing the necessary Boroughwide infrastructure to support housing and economic growth. There are likely to be particular benefits for people affected by social deprivation, young people and children, older people and those with a limiting long-term illness.								



	Women	Asian, Black, Mixed/ Multiple and White non-British	Older people	Young people and children	Disabled and people with a limiting long-term illness	Lesbians, gays, bisexuals and transgender (LGTB+)	People Affected by Social Deprivation	Gypsies and Travellers
<b>ISSUE 53: TRANSPORT IMPACTS - updates Policy 36 of Local Plan 2018</b>								
<p><b>Development Proposals and Construction (a)</b> 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>(b)</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 <b>(c)</b> 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. <b>(d)</b> Development proposals will be required to demonstrate that proposals will not result in any detrimental impact on road safety. <b>(e)</b> 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. <b>(f)</b> 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.</p> <p><b>Sustainable Delivery, Servicing, and Consolidation (a)</b> 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 <b>(b)</b> 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 rapid charge point to allow zero emissions vehicles to operate from the bay; and <b>(c)</b> 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 centre.</p>								
<b>DRAFT POLICY 53: Transport Impacts</b>			+++	+++	++		+++	
<b>LOCAL PLAN 2018: Policy 36</b>			++	++	+		++	
<p>Draft Policy 53 on Transport Impacts will have significantly beneficial impacts in terms of promoting active and sustainable modes of travel; reducing congestion, cutting emissions, improving air quality and public health; requiring developments to contribute towards appropriate supporting transport infrastructure and/or effective mitigation measures; ensuring that major development proposals to submit a Transport Assessment or Transport Statement, and/or Travel Plan, in accordance with London Plan Policy T4 and embedding the Mayor's Healthy Streets Approach in line with Borough Sustainable Transport Strategy. It is well established that number of equalities target groups are disproportionately affected by the long-term health impacts arising from road traffic, congestion and air pollution. Policy 53 on Transport Impacts is therefore expected to have significantly positive benefits for potentially vulnerable groups such as young people and children; older people; disabled people; people affected by a limiting long-term illness and people affected by social deprivation.</p>								
<b>ISSUE 55: INFRASTRUCTURE DELIVERY - updates Policy 38 of Local Plan 2018</b>								
<p><b>(a)</b> 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 policy requirements or propose to deliver planning obligations <b>(b)</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).</p> <p><b>Infrastructure Assessments (c)</b> 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. and sets out how these requirements will be delivered</p>								
<b>DRAFT POLICY 55: Infrastructure</b>			+++	+++	++		+++	
<b>LOCAL PLAN 2018: Policy 38</b>			++	++	+		++	
<p>By confirming the council's intention to secure developer contributions (Section 106 or CIL) where necessary or appropriate to ensure that the necessary infrastructure is secured to support new housing and sustainable economic growth in the borough over the Plan period and by requiring the submission of a site specific infrastructure assessment for major projects, draft Policy 55 on Infrastructure Delivery will have potentially significant beneficial impacts on most equalities target groups. There are likely to be particular benefits for those equalities target groups who are likely to benefit most from accessible social and community facilities; affordable housing provision; improved public transport and a less polluted environment, such as such as young people and children; older people; disabled people; people affected by a limiting long-term illness and people affected by social deprivation.</p>								
<b>ISSUE 56: MONITORING</b>								
<p><b>(a)</b> 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.</p> <p><b>(b)</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.</p>								
<b>DRAFT POLICY 56: Monitoring</b>	+	+	++	++	++	+	++	+
<b>LOCAL PLAN 2018: Policy 38</b>	+	+	++	++	++	+	++	+
<p>Monitoring the implementation and effectiveness of all Local Plan policies via Sutton's Authority Monitoring Report (AMR) will enable the predicted benefits for specific equalities target groups and on wider sustainability objectives to be reviewed on an ongoing basis.</p>								

## 5. CONCLUSIONS AND NEXT STEPS

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### CONCLUSIONS AND NEXT STEPS

5.1 The Council has carried out an Equalities Impact Assessment (EqIA) on Sutton's Local Plan Issues & Preferred Options (Regulation 18 consultation) document by assessing the likely impacts of emerging draft policies and alternative options on each of the following equalities target groups:

- Women;
- Asian, Black, Mixed/ Multiple and White non-British;
- Older people;
- Young people and children;
- Disabled and people with a limiting long-term illness;
- Lesbians, gays, bisexuals and transgender (LGTB+);
- People Affected by Social Deprivation;
- Gypsies and Travellers.

5.2 While the Equality Act 2010 removed the formal requirement for public bodies in England to undertake or publish a detailed EqIA of their policies, practices and decisions (including Local Plans) from April 2011, this EqIA report fulfills the Council's legal duty to "give due regard" to the need to avoid discrimination and promote equality of opportunity for all protected groups when making policy decisions and to publish information showing how they are complying. It also demonstrates how the Council is meeting its commitments on equality, diversity and inclusion as set out in Sutton's Equality, Diversity & Inclusion Framework 2023-27. It has also been published to inform public consultation on Sutton's Local Plan Issues & Preferred Options document and should be read alongside the sustainability appraisal (SA) Report and the Habitats Regulations Appraisal (HRA) screening statement.

5.3 The outcome of the EqIA set out in Section 4, show that the overwhelming majority of Local Plan policy options and draft policies set out in the Regulation 18 document are likely to have strongly beneficial impacts on most of the identified equalities target groups. However all areas of emerging Local Plan policy (i.e. non discriminatory) are found to be neutral with respect to their specific impacts on Lesbians, gays, bisexuals and transgender (LGTB+) people as opposed to the wider population.

5.4 Where a preferred strategic or detailed policy option has been identified in the Regulation 18 document, the results of the EqIA show that the positive social, economic and environmental impacts for most of the equalities target groups are likely to be greater in magnitude. The basis for this conclusion can be found in the detailed evaluation of each policy option set out in the Appraisal Matrix (Section 4).

### NEXT STEPS

5.5 This EqIA Report has been published for public consultation alongside Sutton's Local Plan Issues & Preferred Options (Regulation 18 consultation) document between 25 July and 12 September 2024. In line with Sutton's adopted Statement of Community Involvement (SCI), this EqIA Report can be viewed or downloaded on the Council's website at <http://www.sutton.gov.uk> and copies have been made available for inspection at Civic Offices, St Nicholas Way, Sutton; and all public libraries within the Borough.

5.6 A series of consultation workshops has been arranged for the following Local Committees during July and August 2024: Beddington and Wallington; Carshalton and Clockhouse; North Cheam, Stonecot and Worcester Park; Hackbridge, St Helier and the Wrythe; Sutton Local; and Sutton South, Cheam and Belmont, together with a presentation to the Sutton Community Environmental Champions group.

5.7 All comments received - either in the form of written representations or made at public consultation events - will be taken into account at the next stage of the Local Plan Review process as part of the preparation of the Draft Local Plan Proposed Submission (Regulation 19) document and the accompanying EqIA Report during 2025.





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July 2024

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