



London Borough of Sutton
Local Plan

Sustainability Appraisal Report on Issues & Preferred Options (Regulation 18 consultation)

July 2024



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**Sutton Local Plan
Sustainability Appraisal Report 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 Sustainability Appraisal (SA) Report is six weeks, from 13 June to 26 July 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 or 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
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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Non-Technical Summary

This Sustainability Appraisal (SA) Report has been prepared in order to assess the potential environmental, social and economic impacts of emerging planning policy options and alternatives set out in Sutton's Local Plan Issues & Preferred Options document which has been published for Regulation 18 consultation from 13 June to 26 July 2024.

The Planning and Compulsory Purchase Act 2004 requires a local planning authority to carry out an SA of each of the proposals in a plan during its preparation "with the objective of contributing to the achievement of sustainable development". Accordingly, the National Planning Policy Framework (NPPF) and the Government's Planning Practice Guidance make clear that SA must be undertaken as part of the preparation of the Local Plan. In addition, the strategic environmental assessment (SEA) Regulations 2004, requires SEA to be undertaken on all plans and programmes where they are likely to have significant environmental impacts, including Local Plans. The Council therefore proposes to adopt an integrated approach towards SA and SEA in order to test the soundness of emerging planning policies and proposals against a range of environmental, economic and social criteria.

The SA process for Sutton's new Local Plan (see Figure 1.1) has followed the procedures and key tasks set out in the Government's Planning Practice Guidance and best practice. In addition, the Council is required to inform, involve and consult the local community and all interested parties throughout the process in line with Sutton's adopted Statement of Community Involvement (SCI). Accordingly, the Council has engaged with key environmental stakeholders throughout the preparation of the initial SA Scoping Report since the production of an early draft in September 2023. This included a presentation and workshop at a special meeting of the LB Sutton Community Environmental Champions group on 24 January 2024 and quarterly discussions with the Environment Agency (EA). As the culmination of this process, a finalised SA Scoping Report was published for consultation for five weeks from 7 May to 11 June 2024. In line with the Regulations, copies were provided for the following 'consultation bodies' to seek their input on the proposed scope:

- Environment Agency (EA)
- Historic England (HE); and
- Natural England (EN).

This SA Report, which has been published for public consultation for six weeks between 25 July and 12 September 2024 alongside the Council's 'Issues and Preferred Options' document (Regulation 18), presents the outcome of both Stage B (Tasks B1 to B6) on 'Developing and Refining Options and Assessing Effects' and Stage C on 'Developing and Refining Options and Assessing Effects', as follows

Section 1 provides an **Introduction** to the SA Report on 'Issues and Preferred Options'.

Section 2 sets out the **Appraisal Methodology**.

Section 3 identifies **Other Relevant Plans, Programmes and Sustainability Objectives (Task A1)** which have influenced the strategic options and draft policies set out in the 'Issues and Preferred Options' document. A revised scoping table is provided as Appendix 1.

Section 4 describes the **Environmental, Social and Economic Baseline for Sutton (Task A2)** derived from a range of studies undertaken as part of the local evidence base and Sutton's Authority Monitoring Reports (AMR).

Section 5 identifies the **Key Sustainability Issues and Problems (Task A3)** facing the Borough and which the Local Plan must seek to address.

Section 6 sets out the **Sustainability Appraisal Framework (Task A4)** which has been used as the basis for assessing the social, economic and environmental effects of Sutton's emerging Local Plan. This consists of 12 Core SA Objectives supported by a range of sub-objectives, indicators, targets and appraisal questions.

Section 7 sets out a **compatibility analysis** of emerging Local Plan objectives against the revised SA Framework

Section 8 sets out how emerging preferred options and draft policies were identified

Section 9 sets out the process by which the Council's Potential Site Allocations have been identified and assessed

Section 10 presents the **appraisal findings** for each of the preferred options and draft policies

Section 11 sets out the results of **site assessment and the outcome of sequential test**

Section 12 describes the **Next Steps** in undertaking SA in the preparation of the Local Plan

Summary of Sustainability Appraisal Framework for Sutton's Local Plan (see Section 6)

(1) CLIMATE CHANGE MITIGATION/ ZERO CARBON

Core SA Objective:

To address the causes of climate change by minimising CO₂ emissions and promoting zero carbon standards in new development

(2) FLOOD RISK AND WATER RESOURCES

Core SA Objective:

To avoid, reduce and manage all sources of flood risk to and from development taking account of climate change

(3) OPEN SPACE, URBAN GREENING AND BIODIVERSITY NET GAIN (BNG)

Core SA Objective:

To enhance the provision and quality of Sutton's open environment, promote urban greening and biodiversity linkages and promote biodiversity net gain throughout the Borough

(4) SUSTAINABLE TRANSPORT, HEALTHY STREETS AND AIR POLLUTION

Core SA Objective:

To reduce traffic levels, congestion, local air pollution and CO₂ emissions from transport and promote healthy streets

(5) TOWN CENTRES

Core SA Objective:

To enhance the vitality and viability of Sutton Town Centre and town centres throughout the Borough

(6) INDUSTRIAL LAND AND EMPLOYMENT

Core SA Objective:

To promote the success of Sutton's economy and local employment opportunities

(7) URBAN REGENERATION AND AREA RENEWAL

Core SA Objective

To create the world's leading life science district specialising in cancer research on the LCH site; promote Sutton Link and secure inward investment for area renewal programmes throughout the borough

(8) GREEN ECONOMY

Core SA Objective

To attract green business and jobs to the Borough, promote the 'circular' economy and accelerate the decarbonisation of existing social; housing stock and other buildings.

(9) HOUSING

Core SA Objective:

To meet the future local need for housing and for affordable housing and the Borough's share of London's need

(10) SOCIAL INFRASTRUCTURE/COMMUNITY FACILITIES

Core SA Objective:

To maintain and enhance good access to health, education, sports facilities and play spaces for Borough residents

(11) GOOD DESIGN, TOWNSCAPE, LOCAL CHARACTER AND HERITAGE

Core SA Objective:

To protect and enhance the quality of built design, townscape quality, local character and the Borough's historic environment.

(12) EQUALITIES AND QUALITY OF LIFE

Core SA Objective:

To ensure that the Local Plan does not discriminate against equalities target groups, in particular those groups who are disproportionately affected by climate impacts; to tackle social and economic deprivation, reduce exclusion, and enhance improve accessibility to essential services and community facilities for all

1. INTRODUCTION

LOCAL PLAN

1.1 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)¹.

1.2 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 Guidance² 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.

1.3 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. For plan-making, 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.

1.4 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 Plan³ and helps to deliver the Council's long-term aspirations for the future of the Borough set out Sutton's Corporate Plan 2022-27⁴; Sutton's Environment Strategy and Climate Emergency Response Plan 2021⁵; Sutton's Economic Development Strategy⁶; 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).

1.5 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 2018⁷ (but not the South London Waste Plan DPD). Sutton's adopted local development scheme (LDS), approved in July 2021, sets out the Council's timescales and milestones for the preparation of the Local Plan over the next 2 years. It can be seen from the LDS that the initial stage of Local Plan evidence gathering got underway in Spring 2022 with final adoption of the Plan scheduled for 2026.

¹ the updated NPPF (DLUCG, December) is available at <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

² the Government's Planning Practice Guidance (DLUCG/ MHCLG, Feb 2024) is available at <https://www.gov.uk/government/collections/planning-practice-guidance>

³ the New London Plan 2021 is available at <https://www.london.gov.uk/programmes-strategies/planning/london-plan/new-london-plan/london-plan-2021>

⁴ Sutton's Corporate Plan 2022-27 'Ambitious for Sutton' is available at <https://www.sutton.gov.uk/ambitiousforsutton>

⁵ Sutton's Environment Strategy and Climate Emergency Response Plan 2021 is available at <https://www.sutton.gov.uk/-/sutton-climate-and-ecological-emergency>

PUBLIC CONSULTATION ON LOCAL PLAN ISSUES AND PREFERRED OPTIONS

1.6 The Council is required to inform, involve and consult the local community and all interested parties throughout the preparation of the Local Plan in line with Sutton's adopted Statement of Community Involvement (SCI)⁸. Following approval at the Council's Housing Environment and Business (HEB) Committee on 17 July 2024, Sutton's Local Plan 'Issues and Preferred Options' (I&PO) document (Regulation 18) has been published for consultation for a period of 7 weeks between 25 July and 12 September 2024. The I&PO document sets out key Local Plan issues, strategic options and the Council's preferred policies based on the findings of the initial evidence gathering stage (see below) and the outcome of the previous stage of consultation on the Sustainability Appraisal (SA) Scoping Report which took place between September 2023 and June 2024⁹.

WHAT IS SUSTAINABLE DEVELOPMENT?

1.7 Sustainable development seeks to address the causes and impacts of climate change, achieve improved quality of life, support economic prosperity and deliver social justice by promoting a zero carbon economy and protecting against environmental degradation, depletion of natural resources and loss of biodiversity.

1.8 While many alternative definitions for sustainable development have been used over recent decades, the UK Environmental Strategy (DEFRA, 2018)¹⁰ makes reference to the following 17 goals which form the basis for the UN 2030 Agenda for Sustainable Development (A/RES/70/1, 2016)¹¹:

- **Goal 1:** End poverty in all its forms everywhere;
- **Goal 2:** End hunger, achieve food security and improved nutrition and promote sustainable agriculture;
- **Goal 3:** Ensure healthy lives and promote well-being for all at all ages;
- **Goal 4:** Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all;
- **Goal 5:** Achieve gender equality and empower all women and girls;
- **Goal 6:** Ensure availability and sustainable management of water and sanitation for all;
- **Goal 7:** Ensure access to affordable, reliable, sustainable and modern energy for all;
- **Goal 8:** Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all;
- **Goal 9:** Build resilient infrastructure, promote inclusive and sustainable industrialization and foster innovation;
- **Goal 10:** Reduce inequality within and among countries;
- **Goal 11:** Make cities and human settlements inclusive, safe, resilient and sustainable;
- **Goal 12:** Ensure sustainable consumption and production patterns;
- **Goal 13:** Take urgent action to combat climate change and its impacts;
- **Goal 14:** Conserve and sustainably use the oceans, seas and marine resources for sustainable development;
- **Goal 15:** Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and halt and reverse land degradation and halt biodiversity loss;
- **Goal 16:** Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels;
- **Goal 17:** Strengthen the means of implementation and revitalize the Global Partnership for Sustainable Development.

1.9 However, many of the above UN goals relate to international actions at the international or global scale which lie well beyond the influence of the Local Plan. A more concise and perhaps more applicable definition within the context of the Borough is provided in the former UK Sustainable Development Strategy (ODPM, 2005) which defines sustainable development as *"enabling all people throughout the world to satisfy their basic needs and enjoy a better quality of life, without compromising the quality of life of future generations"* and identifies the following guiding principles:

⁸ Sutton's adopted Statement of Community Involvement (SCI) is available at https://www.sutton.gov.uk/info/200464/planning_policy/1344/local_plan/3

⁹ the SA Scoping Report can be accessed at https://www.sutton.gov.uk/info/200464/planning_policy/1432/sustainability_appraisal_of_suttons_local_plan

¹⁰ UK Environmental Strategy 'A Green Future: Our 25 Year Plan to Improve the Environment' (DEFRA, 2018) is available at <https://www.gov.uk/government/publications/25-year-environment-plan>

¹¹ the UN 2030 Agenda for Sustainable Development (A/RES/70/1, 2016) is available at

<https://sustainabledevelopment.un.org/content/documents/21252030%20Agenda%20for%20Sustainable%20Development%20web.pdf>

(1) Living within Environmental Limits

Respecting the limits of the planet's environment, resources and bio-diversity, to improve our environment and ensure that natural resources needed for life are unimpaired and remain so for future generations.

(2) Ensuring a Strong, Healthy and Just Society

Meeting the diverse needs of all people in existing and future communities, promoting personal well being, social cohesion and inclusion and creating equal opportunity for all.

(3) Achieving a Sustainable Economy

Building a strong, stable and sustainable economy which provides prosperity & opportunities for all, and in which environmental and social costs fall on those who impose them (polluter pays), and efficient resource use is incentivised.

(4) Using Sound Science Responsibly

Ensuring policy is developed and implemented on the basis of strong scientific evidence, whilst taking into account scientific uncertainty (through the precautionary principle) as well as public attitudes and values.

(5) Promoting Good Governance

Actively promoting effective, participative systems of governance in all levels of society, engaging people's creativity, energy, and diversity.

1.10 Whatever definition is followed, the planning system (in seeking to regulate the development and use of land in the public interest) is key to achieving sustainable development and promoting outcomes in which environmental, economic and social objectives are achieved together over time.

REQUIREMENT FOR SUSTAINABILITY APPRAISAL

1.11 Section 19 of the Planning and Compulsory Purchase Act 2004 requires local planning authorities to carry out a sustainability appraisal (SA) in the preparation of the Local Plan. SA applies to any of the documents forming part of a Local Plan although Neighbourhood Plans, supplementary planning documents (SPDs), the Statement of Community Involvement (SCI), the LDS and the Autothority Monitoring Report (AMR) are excluded from this requirement.

1.12 In addition, SAs should incorporate the requirements of the UK Strategic Environmental Assessment (SEA) Regulations 2004¹², which seeks to provide a high level of protection of the environment by integrating environmental considerations into the process of preparing certain plans and programmes. Local Plans may also require a Habitats Regulations Assessment, as set out in the Conservation of Habitats and Species Regulations 2010 (as amended) if it is considered likely to have significant effects on European habitats or species. The SA should take account of the findings of the Habitats Regulations Assessment, if one is undertaken.

1.13 This document comprises the initial stage of the SA (incorporating SEA) for Sutton's emerging Local Plan. It sets out the necessary information required to determine the scope of the appraisal and establishes an SA Framework against which the effects of all local development documents will be assessed.

PURPOSE OF SUSTAINABILITY APPRAISAL

1.14 SA is integral to the preparation and development of a Local Plan. Its purpose is to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives. The relationship between the SA and Local Plan preparation processes is shown in Figure 1.1.

1.15 SA seeks to report on the significant impacts of plan implementation and alternatives (including the 'business as usual' and 'do-nothing' options) on the environmental, economic and social objectives of sustainable development.

1.16 By identifying key sustainability issues, developing policy options and assessing their likely effects from the earliest stages of plan preparation, SA is an important tool for developing more effective and sustainable planning policies which meet the aspirations of the local community.

1.17 SA also helps planners and the public gain a better understanding of the inter-relationships between the aims of

¹² while the SEA Regulations 2004 were originally introduced to implement the requirements of the EU SEA Directive 2001/42/EC, these regulations remain in place as of December 2022 despite the UK having left the EU

social inclusion, environmental protection, the use of natural resources and economic growth.

1.18 To be effective, SA must be:

- **Inclusive:** ensuring early and on-going involvement of the public, statutory bodies and other relevant stakeholders at the appropriate stages of plan preparation;
- **Objectives-led:** so that the direction of desired change is made explicit in terms of measurable targets;
- **Evidence-based:** including relevant baseline information against which the potential effects of the plan and policy options can be measured and assessed;
- **Useful:** providing clear conclusions and recommendations on how the plan can be made more sustainable and proposals for future monitoring.

1.19 The SA process also provides the means of identifying and mitigating any potential adverse effects that the plan might otherwise have.

1.20 At the culmination of the plan preparation process, the final SA Report should describe how the adopted Local Plan has addressed the sustainability agenda and the choices that have been made between alternative policies and proposals. This will be considered by the Insector alongside a range of other evidence base documents when determining the soundness of the plan at the Examination in Public (EiP) stage.

ENGAGEMENT ON SA SCOPING REPORT

1.21 The SA process for Sutton's new Local Plan has followed the procedures and key tasks set out in the SEA Regulations, Government's guidance and best practice. Accordingly, the Council has engaged with key environmental stakeholders throughout the preparation of the initial SA Scoping Report since the production of an early draft in September 2023. This included a presentation and workshop at a special meeting of the LB Sutton Community Environmental Champions group on 24 January 2024 and quarterly discussions with the Environment Agency (EA). As the culmination of this process, a finalised SA Scoping Report was published for consultation for five weeks from 7 May to 11 June 2024. In line with the Regulations, copies were provided for the following 'consultation bodies' in order to seek their input on the proposed scope:

- Environment Agency (EA)
- Historic England (HE); and
- Natural England (EN).

1.22 The Scoping Report was also sent to a range of appropriate authorities and local stakeholders with environmental interests or responsibilities, including the Greater London Authority GLA and Greenspace Information for Greater London (GiGL) CIC. The Scoping Report was also made available for inspection at Civic Offices, St Nicholas Way, Sutton; Westcroft Leisure Centre, Carshalton; and all public libraries within the Borough. Consultation responses and details of how each of the comments has been addressed in this updated SA Report are set out in **Appendix 1**.

PURPOSE OF SA REPORT ON LOCAL PLAN ISSUES & PREFERRED OPTIONS (THIS DOCUMENT)

1.23 The purpose of the SA Report on Local Plan Issues and Options (this document) is to inform public consultation on the Local Plan Issues & Preferred Options (Regulation 18 consultation) document by assessing the likely impacts of alternative strategic options and the Council's preferred policies on the environmental, social and economic objectives making up the Council's amended SA Framework.

1.24 This SA Report is divided into the following Sections which address Tasks A1-A5 set out in Government guidance:

- **Section 2: Appraisal Methodology;**
- **Section 3: Other Relevant Policies, Plans, Programmes & Sustainability Objectives (Task A1);**
- **Section 4: The Environmental, Social and Economic Baseline for Sutton (Task A2);**
- **Section 5: Key Sustainability Issues and Problems (Task A3);**
- **Section 6: The Sustainability Appraisal Framework for Sutton (Task A4);**
- **Section 7: Testing Plan Objectives Against SA Framework (Task B1);**
- **Section 8: Developing the Preferred Options: Part 1 - Policies (Task B2);**
- **Section 9: Developing Preferred Options: Part 2 - Development Sites (TASK B2);**

- **Section 10: Appraisal of Preferred Development Management Policies (Tasks B3, B4 & B5);**
- **Section 11: Assessment and ‘Sequential Testing’ of Potential Sites (Tasks B3, B4 and B5); and**
- **Section 12: Conclusions and Next Steps**

CONSULTATION ARRANGEMENTS

1.25 Following approval at HEB Committee on 17 July 2024, this SA 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 13 June to Friday 26 July 2024. In line with Sutton’s adopted Statement of Community Involvement (SCI)¹³, this SA 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.

1.26 A series of consultation workshops has been arranged for the following Local Committees during June and July 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 (where the SA will form the focus of the discussions).

1.27 Copies have also sent to the three statutory consultation bodies (Historic England, Natural England and Environment Agency) and to a range of appropriate authorities and local stakeholders with environmental interests or responsibilities, including those who responded previously to the Scoping Report.

EQUALITIES IMPACT ASSESSMENT

1.28 The purpose of Equalities Impact Assessment (EqIA) is to help public bodies identify potential sources of discrimination against specific equalities groups arising from their policies or operations and take appropriate steps to address them. 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 removed the formal requirement for public bodies in England to a detailed EqIA of their policies, practices and decisions (including Local Plans) from April 2011, local authorities still have a legal duty to “give due regard” to avoiding discrimination and promoting equality of opportunity for all protected groups when making policy decisions and to demonstrate how they are complying with this duty. An EqIA Report on the Local Plan Issues and Preferred Options (Regulation 18) document has therefore been prepared for public consultation between 25 July and 12 September 2024 alongside the SA Report and other supporting documents.

HABITATS REGULATIONS ASSESSMENT (APPROPRIATE ASSESSMENT)

1.29 The need for habitats regulations assessment¹⁴ (HRA) originates from the EU Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (known as the ‘Habitats Directive’) as set out in the UK Conservation of Habitats and Species Regulations 2010 (as amended)¹⁵. The Regulations – which remain in place following Brexit - seek to safeguard designated European sites within the UK, including Special Areas of Conservation (SACs), Special Protection Areas (SPAs), Ramsar sites and sites of special scientific interest (SSSIs), and therefore protect the habitats and species listed in the Annexes of the Directive.

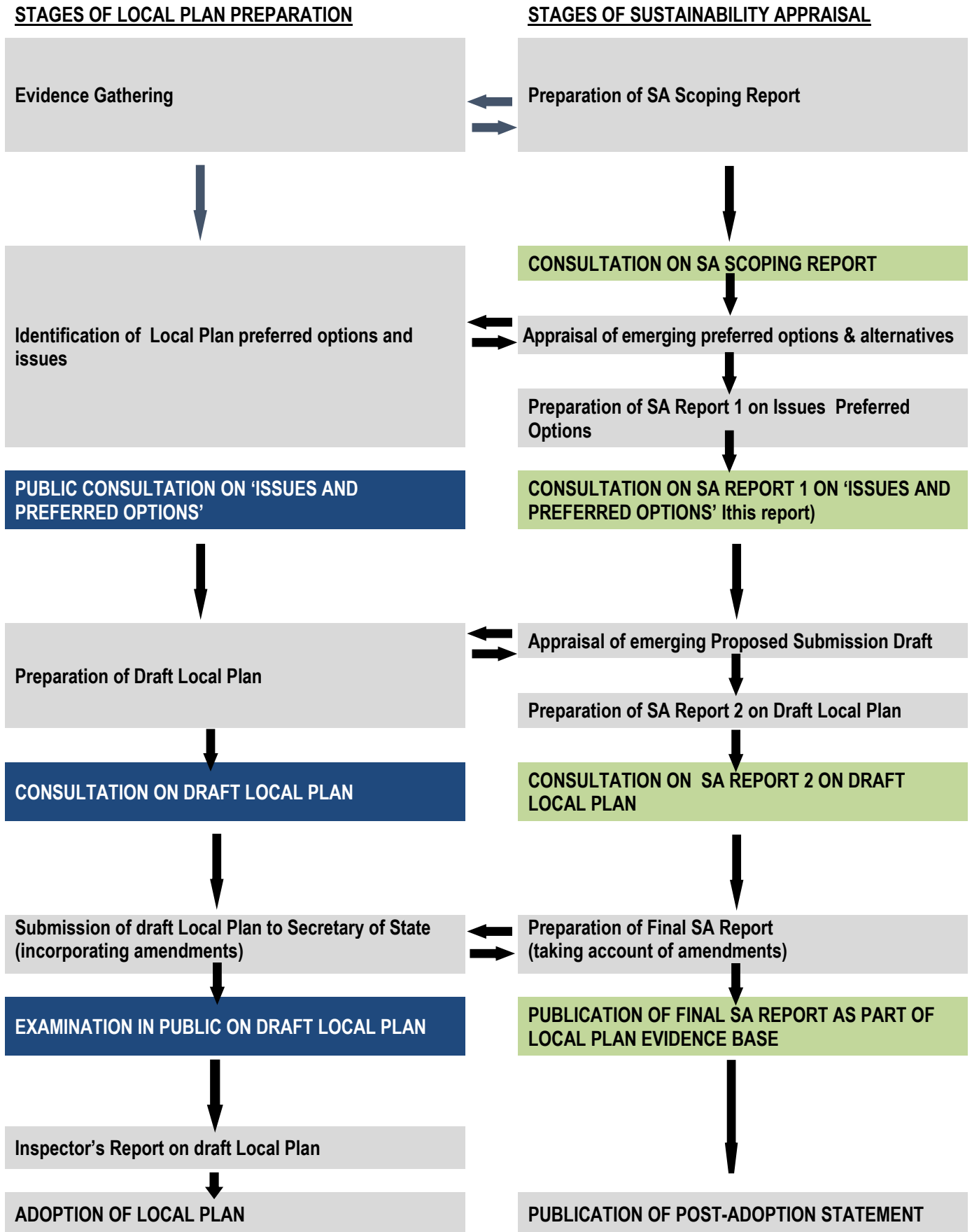
1.30 Under the Regulations, local planning authorities must undertake an HRA where a plan or project is likely to have a ‘significant effect’ upon a designated site, either individually or in combination with other projects. The outcome of habitats regulations screening will be provided as part of the next SA/SEA Report on on draft Local Plan Proposed Submission which will be published for consultation in 2025. The outcome of HRA screening undertaken in the preparation of the current Local Plan in 2017 is provided for information as Appendix 2.

¹³ Sutton’s adopted Statement of Community Involvement (SCI) (Dec 2019) is available at https://drive.google.com/file/d/1bODFqsgdm_C6dN6SopgDFblllAXSzmtD/view

¹⁴ Habitats Regulations Assessment (HRA) is also commonly referred to as ‘Appropriate Assessment’

¹⁵ although the UK departed the EU in March 2020 through Brexit, the Conservation of Habitats and Species Regulations 2010 remain in force as of August 2023¹⁵

Figure 1.1: Sustainability Appraisal as part of the Local Plan Process



2. SUSTAINABILITY APPRAISAL AND STRATEGIC ENVIRONMENTAL ASSESSMENT

GOVERNMENT GUIDANCE AND BEST PRACTICE

2.1 The proposed approach to undertaking sustainability appraisal (SA) as part of the preparation of Sutton's new Local Plan is based on the government's national planning practice guidance (NPPG) and best practice. The appraisal methodology outlined below is designed to ensure compliance with the Planning and Compulsory Purchase Act 2004, the Strategic Environmental Assessment (SEA) Regulations 2004 and the Conservation of Habitats and Species Regulations 2010 as amended.

MAIN STAGES OF APPRAISAL

2.2 Government guidance identifies five main stages of appraisal (A to E) that should be carried out as part of the preparation of all development plan documents (DPDs), including the Local Plan. Each stage consists of a number of 'key tasks' as outlined below.

Stage A: Setting the Context and Objectives, Establishing the Baseline and Deciding on Scope

2.3 Stage A, to be undertaken as part of the evidence-gathering process, consist of the following tasks:

- **Task A1:** Identifying other relevant policies, plans and programmes, and sustainability objectives which are likely to influence the options to be considered (Section 5);
- **Task A2:** Collecting 'baseline' information to enable the impacts of policy options on sustainability objectives to be predicted and monitored (Section 6);
- **Task A3:** Identifying sustainability issues and environmental problems as the basis for defining key issues for the plan to address (Section 7);
- **Task A4:** Developing the SA Framework, consisting of sustainability objectives, indicators and targets, in order to test the environmental, social and economic effects of the plan (Section 8); and
- **Task A5:** Consulting on the scope of the SA on the basis of a scoping report presenting the outcome of Stage A (i.e. this document).

2.4 The SA Scoping Report (i.e. this document) presents the outcome of Stage A in relation to the appraisal of the emerging Local Plan.

Stage B: Developing and Refining Options and Assessing Effects

2.5 Stage B, which is to be undertaken as part of the preparation of 'issues and options' and subsequently in the preparation of 'preferred options', involves:

- **Task B1:** Testing plan objectives against the SA Framework to ensure compatibility;
- **Task B2:** Developing plan options, working with the community and stakeholders, in order to achieve the objectives and contribute to sustainable development;
- **Task B3:** Predicting the social, economic and environmental effects of the plan options against the SA Framework and comparing with the 'no plan' and 'business as usual' scenarios;
- **Task B4:** Evaluating the effects of the plan in terms of their significance and the overall sustainability of each option, including the 'preferred option';
- **Task B5:** Considering ways of mitigating adverse effects and maximising beneficial effects; and
- **Task B6:** Proposing measures to monitor the significant effects of plan implementation.

Stage C: Preparing the Sustainability Appraisal Report

2.6 The SA Report, which must be prepared alongside the 'preferred options' document for statutory public consultation, is the key output of the appraisal process.

- **Task C1:** Preparing the SA Report.

2.7 The SA Report should present the outcome of Stages A and B and clearly show that the SEA Regulation's requirements have been met in terms of providing information on the likely significant effects on the environment, the reasons for selecting the alternatives dealt with and measures to prevent, reduce or offset any potentially adverse effects.

2.8 In line with Task C1, it is therefore intended to prepare a series of SA reports for public consultation (i) at the Local Plan 'issues and options' stage (ii) at the 'proposed submission' stage; and (iii) on the submission draft incorporating minor changes.

Stage D: Consulting on Preferred Options

2.9 Stage D involves the following Tasks:

- **Task D1:** Public participation on Preferred Options and the SA Report to give the public and statutory bodies an opportunity to comment;
- **Task D2(i):** Appraising significant changes which may have been incorporated within the plan prior to submission;
- **Task D2(ii):** Appraising significant changes resulting from representations; and
- **Task D3:** Making decisions and providing information through the production of an Adoption Statement to accompany the adopted plan. The Adoption Statement will outline how the findings of SA have been taken into account and how sustainability considerations have been integrated into the plan.

Stage E: Monitoring the significant effects of implementing the plan

2.10 Stage E requires the significant effects of the plan to be monitored in order to measure its performance against sustainability objectives and inform future policy revisions:

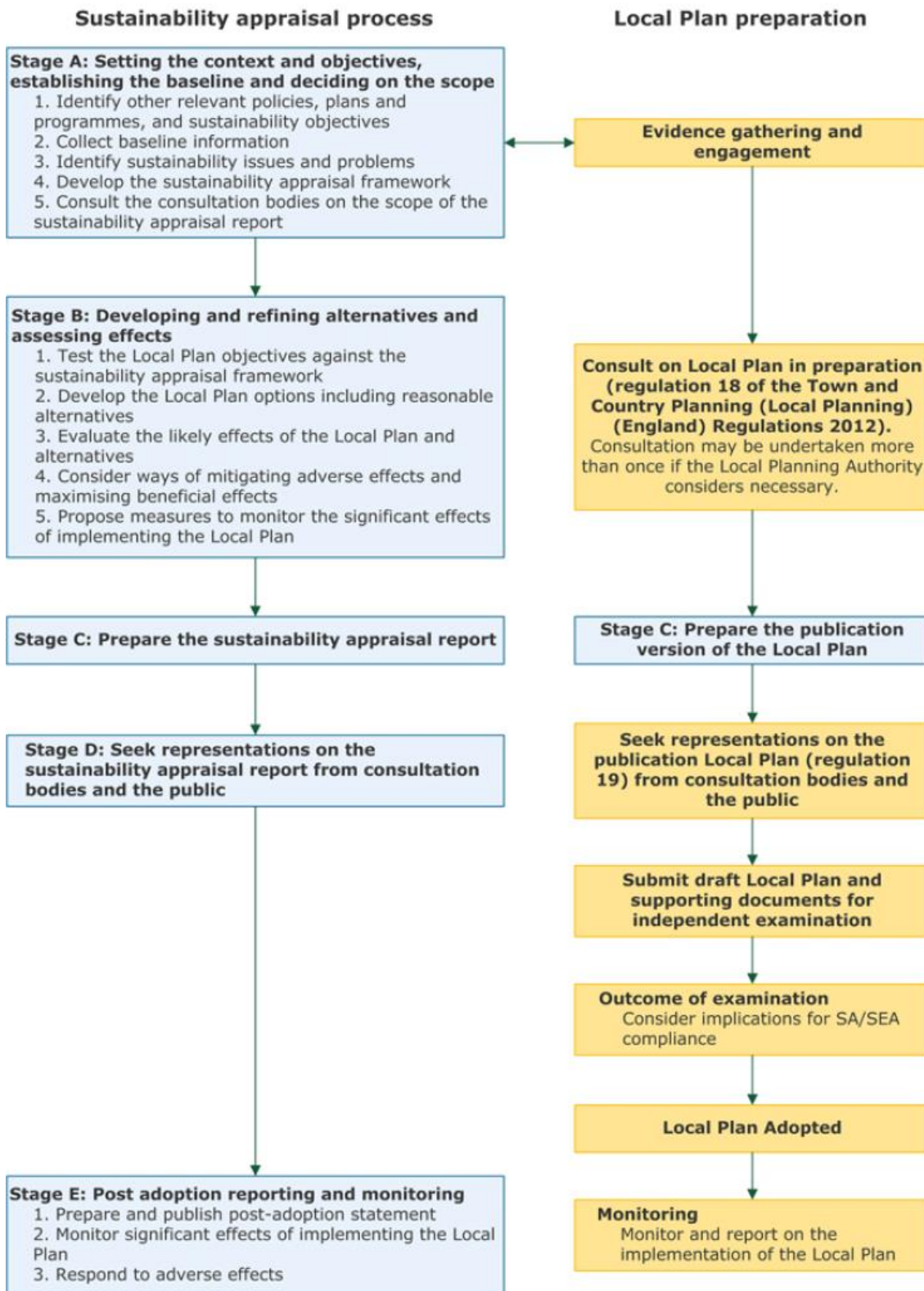
- **Task E1:** Finalising aims and methods for monitoring; and
- **Task E2:** Responding to adverse effects.

2.11 In line with Government guidance, Sutton's Authority Monitoring Report (AMR) should therefore provide the means for monitoring and reporting on the significant effects of the Local Plan once it has been adopted, in order to measure its performance against the sustainability objectives, indicators and targets included both within the plan's monitoring framework and the SA Framework (see Section 9).

KEY OUTPUTS OF APPRAISAL

2.12 Figure 2.1 shows main stages of SA in relation to the plan-making process.

Figure 2.1: Main Stages of SA in relation to the Plan-making process



2.13 Table 2.1 sets out the key outputs of the SA process in relation to the new Local Plan in terms of the expected timescale for the preparation of SA Reports for public consultation.

Table 2.1: Key Outputs of the SA process

Stage of Plan Preparation	Key Appraisal Outputs (publication of SA Reports)	Timescale (estimated)
Evidence Gathering	<ul style="list-style-type: none"> • SA Scoping Report (this document) <i>SA Stages A1-A5</i> 	Consultation with relevant bodies Oct 2023 –June 024
Consultation on Issues and Options	<ul style="list-style-type: none"> • SA Report on Issues & Options • Equalities Impact Assessment (EqIA) report • Habitats Regulations Assessment (HRA) screening <p style="text-align: right;"><i>SA Stages A1-A5</i></p>	25 July to 12 September 2024
Consultation on draft Local Plan Proposed Submission	<ul style="list-style-type: none"> • SA Report on Proposed Submission • EqIA • HRA (if required) <p style="text-align: right;"><i>SA Stages C1 and D1</i></p>	Feb-March 2025
Submission of draft Local Plan incorporating minor changes to the Secretary of State	<ul style="list-style-type: none"> • SA Report on Submission Draft incorporating minor changes • EqIA • HRA (if required) <p style="text-align: right;"><i>SA Stage D2(i)</i></p>	June 2025
Examination-in-Public	n/a	Oct 2025
Inspector's Report	n/a	Jan 2026
Adoption of Local Plan incorporating modifications	<ul style="list-style-type: none"> • SA Report on modifications arising from Inspector's Report <p style="text-align: right;"><i>SA Stage D2(ii)</i></p>	June 2026
Post-adoption	<ul style="list-style-type: none"> • ongoing monitoring of Local Plan (via AMRs) <p style="text-align: right;"><i>SA Stages E1 and E2</i></p>	From June 2026

3. OTHER RELEVANT PLANS, PROGRAMMES AND SUSTAINABILITY OBJECTIVES (TASK A1)

ESTABLISHING THE POLICY CONTEXT

3.1 In line with the Government's Planning Practice Guidance, the Council has carried out a full review of all national, regional and local plans, programmes and sustainability objectives which must be taken into account in the preparation of Sutton's Local Plan. The review of the policy context, together with an understanding of future Borough population trends and the current environmental, social and economic baseline for Sutton set out in Section 4, have been used to identify the key sustainability issues to be addressed by the plan and inform the objectives, targets and indicators included within the Council's proposed sustainability appraisal (SA) Framework (Section 6).

3.2 This chapter describes the policy context within which Sutton's Local Plan is being prepared, taking account of the Council's corporate priorities, and highlights the objectives of other organisations and service providers which the Plan needs to support. It should be noted, however, that although sustainability objectives, targets and indicators developed to test the social, economic and environmental effects of policies (see SA Framework) are distinct from plan objectives, there are many areas of overlap.

INTERNATIONAL CONTEXT

3.3 The sustainability objectives, targets and indicators to be developed for inclusion in the SA Framework must have regard to the objectives and key targets associated with the following international strategies, plans and programmes:

United Nations (UN) Sustainable Development Goals

3.4 The UN Sustainable Development Goals are a universal call to action to end poverty, protect the planet and improve the lives and prospects of everyone, everywhere. The 17 Goals were adopted by all UN Member States in 2015 as part of the 2030 Agenda for Sustainable Development which set out a 15-year plan to achieve them (see Section 1, Paragraph 1.7 for details of each of the Goals). Subsequently, in September 2019, the UN Secretary-General called on all sectors of society to mobilize for a 'decade of action' on three levels:

- **global action** to secure greater leadership, more resources and smarter solutions for the Sustainable Development Goals;
- **local action** embedding the needed transitions in the policies, budgets, institutions and regulatory frameworks of governments, cities and local authorities; and
- **people action**, including by youth, civil society, the media, the private sector, unions, academia and other stakeholders, to generate an unstoppable movement pushing for the required transformations.

Intergovernmental Panel on Climate Change (IPCC) Reports

3.5 Since its formation in 1988, the objective of the IPCC has been to provide governments with accurate scientific information that they can use to develop climate policies. For the IPCC assessment reports, which form a key input into international climate change negotiations, thousands of volunteer climate scientists across the world assess the many scientific papers published each year to provide a comprehensive summary of what is known about the drivers of climate change, its impacts and future risks, and how adaptation and mitigation can reduce those risks. This open and transparent review is an essential part of the IPCC process and helps to identify the strength of scientific agreement in different areas and where further research is needed.

3.6 According to the Sixth Assessment Report (AR6) of the Intergovernmental Panel on Climate Change (IPCC, March 2023), human activities, principally through emissions of carbon dioxide and other greenhouse gases, have unequivocally caused global warming, with global surface temperatures reaching 1.1°C above the 1850-1900 average from 2011-2020. Global greenhouse gas emissions have continued to increase. In 2019, atmospheric CO₂ concentrations (410 parts per million) were higher than at any time in at least 2 million years.

3.7 Human-caused climate change is driving an increase in the frequency and severity of extreme weather events across the globe, such as heatwaves, heavy precipitation, droughts, and storms. Climate change is also affecting food and water security for millions and causing widespread and irreversible damage to ecosystems, habitats and species.

3.8 The Sixth Assessment Report concludes that:

- the current decade represents the last chance to implement effective climate policies that are sufficient to meet the global challenges of climate change.
- 1.5°C of warming could be exceeded by 2030, 10 years earlier than anticipated by the IPCC's 5th Assessment Report.
- limiting the rise in average global temperatures to 1.5°C in line with the Paris Agreement's most ambitious goal will still lead to serious and sometimes irreversible consequences for centuries.
- limiting warming to 1.5 °C is possible, but would require emissions to be cut 50% by the year 2030 and 100% by 2050.
- limiting the rise in average global temperatures to 2.0°C would still require the commitment of effective, ambitious, and coordinated climate policies in terms of restricting the use of fossil fuels, especially during this decade; and
- humanity has emitted 2,560 billion equivalent tons of CO₂ since 1750, and we only have a budget of 500 more if we want to limit warming to 1.5°C.

Paris Agreement 2015 (COP21)

3.10 The Paris Agreement is a legally binding international treaty negotiated between world leaders at the UN Climate Change Conference (COP21) in Paris in December 2015. The Agreement includes commitments from 194 signatories (193 nation states and the EU) to reduce their emissions and work together to adapt to the impacts of climate change, and calls on all countries to strengthen their commitments over time. In seeking to achieve a decisive shift towards a net-zero carbon emissions world and deliver on the relevant UN Sustainable Development Goals, the Paris Agreement provides a pathway for developed nations to assist developing nations in their climate mitigation and adaptation efforts while creating a framework for the transparent monitoring and reporting of countries' climate goals.

3.11 The Paris Agreement sets the following long term goals:

- substantially reduce global greenhouse gas emissions to limit the global temperature increase in this century to 2 degrees Celsius while pursuing efforts to limit the increase even further to 1.5 degrees;
- review countries' commitments every five years;
- provide financing to developing countries to mitigate climate change, strengthen resilience and enhance abilities to adapt to climate impacts.

3.12 The Paris Agreement works on a five- year cycle of increasingly ambitious climate action carried out by countries. Every five years, each country is expected to submit an updated national climate action plan - known as a Nationally Determined Contribution (NDC). The operational details for the practical implementation of the Paris Agreement were agreed on at the UN Climate Change Conference (COP24) in Katowice, Poland, in December 2018, in what is colloquially called the Paris Rulebook, and finalised at COP26 in Glasgow, Scotland, in November 2021. The two main outcomes were the signing of the Glasgow Climate Pact and agreeing the Paris Rulebook. While these set out a number of resolutions setting out what needs to be done to tackle climate change, it did not identify what each country must do and is not legally binding

UN Convention on Biological Diversity

3.13 The UN Convention on Biological Diversity, ratified by 196 nations in 1992, is the international legal instrument for "the conservation of biological diversity, the sustainable use of its components and the fair and equitable sharing of the benefits arising out of the utilization of genetic resources". Its overall objective is to encourage actions, which will lead to a sustainable future. The Convention covers global biodiversity issues at all levels: ecosystems, species, genetic resources, biodiversity science, politics and business. The CBD's governing body meets every two years to review progress, set priorities and commit to work plans.

3.14 At the UN Biodiversity Conference in Nagoya, Japan in October 2010, the UN Biodiversity Convention adopted an updated Strategic Plan for Biodiversity. This included 20 Biodiversity Targets (known as the Aichi biodiversity targets) for the 2011-2020 period, falling under the following goals:

- Strategic Goal A: Address the underlying causes of biodiversity loss by mainstreaming biodiversity across government and society.
- Strategic Goal B: Reduce the direct pressures on biodiversity and promote sustainable use.
- Strategic Goal C: To improve the status of biodiversity by safeguarding ecosystems, species and genetic diversity.
- Strategic Goal D: Enhance the benefits to all from biodiversity and ecosystem services.
- Strategic Goal E: Enhance implementation through participatory planning, knowledge management and capacity building.

3.15 A few years later, at the UN Biodiversity Conference in Cancun in 2016, heads of delegations made the following Declaration “*life on planet Earth and our common future are at stake. It is urgent to take strong actions in a responsible manner to ensure the survival of biological wealth and healthy ecosystems that support human development and well-being. We must strive to achieve the Aichi Biodiversity Targets and the 2050 Vision of Living in Harmony with Nature. Therefore, we must raise the level of ambition and political will for mainstreaming the conservation and sustainable use of biodiversity, and the fair and equitable sharing of benefits arising from the use of genetic resources*”

European Union Directives post-Brexit

3.16 It should be noted that the following European Union (EU) Directives **no longer apply** since the UK’s departure from the EU in 2020, although much of the corresponding UK legislation remains in place¹⁴ as of February 2023:

- EU Spatial Development Perspective (1999);
- EU SEA Directive 2001;
- EU Air Quality Framework Directive (1996/62/EC);
- EU Air Quality Daughter Directive (1999/30/EC);
- EU Habitats Directive (92/43/EEC);
- EU Wild Birds Directive (1997/49/EC);
- EU Environmental Noise Directive (2002/49/EC)
- EU Framework Directive on Waste (1991/156/EEC);
- EU Landfill Directive (1999/31/EC);
- EU Water Framework Directive (2000/60/EC);
- EU Waste Framework Directive 2008;
- EU Directive on the energy performance of buildings (2002/91/EC);
- EU Sustainable Development Strategy (2001);
- EU Directive on Conservation of Wild Birds 2009/147/EC; and
- EU Energy Efficiency Directive 2012/27/EU.

NATIONAL CONTEXT

3.17 At the national level, the National Planning Policy Framework (NPPF) (December 2023) together with the following Government legislation, strategies and guidance provide an important point of reference in updating Sutton’s SA Framework:

Legislation

- Ancient Monuments & Archaeological Areas Act 1979
- Wildlife & Countryside Act 1981;
- Town and Country Planning Act 1990
- Planning (Hazardous Substances) Act 1990;
- The Planning (Listed Buildings and Conservation Areas) Act 1990;
- Planning (Consequential Provisions) Act 1990;
- Planning and Compensation Act 1991
- SEA Regulations 2004;
- Planning & Compulsory Purchase Act 2004;
- Sustainable Communities Act 2007;
- Growth and Infrastructure Act 2013;
- Community Infrastructure Levy Regulations 2013
- Deregulation Act 2015;
- Neighbourhood Planning (General) (Amendment) Regulations 2015;
- Statutory Instrument 2015 No. 596 The Town and Country Planning (General Permitted Development) (England) Order 2015;
- Town and Country Planning (Development Management Procedure) (England) Order 2015

¹⁴ the Retained EU Law (Revocation and Reform) Bill, which received Royal Assent in January 2024, overhauls a body of UK law known as ‘retained EU law’ which includes a number of environmental regulations. This was created by the EU (Withdrawal) Act 2018 as amended by the EU (Withdrawal Agreement) Act 2020

- Climate Change Act 2008;
- Planning Act 2008;
- Planning and Energy Act 2008
- Flood Risk Regulations 2009;
- Flood and Water Management Act 2010;
- Sustainable Communities Act (Amendment) Act 2010;
- Community Infrastructure Levy Regulations 2010;
- Conservation of Habitats and Species Act 2010;
- Localism Act 2011;
- Neighbourhood Planning Regulations 2012;
- Sustainable Communities Regulations 2012;
- (implementing Schedule 3 of Flood & Water Management Act 2010);
- Fixing the foundations: creating a more prosperous nation' (HM Treasury/BIS July 2015);
- Housing and Planning Act 2016;
- Neighbourhood Planning Act 2017;
- Conservation of Habitats and Species Regulations 2017 (as amended)
- Business and Planning Act 2020;
- Environment Act 2021; and
- Building Regulations 2021 (Part L) June 2022.
- Energy Act (October 2023)

Levelling-up and Regeneration Act 2023

3.18 The Levelling-up and Regeneration Act, which received Royal Assent in October 2023 will introduce a number of fundamental changes to the planning system, including proposals to;

- simplify Local Plans in order to speed up the planning process. Each local planning authority will be required to prepare one Local Plan, with the content limited to locally specific matters such as allocating land for development, detailing required infrastructure and setting out principles of good design;
- publish a common Government framework of National Development Management Policies. This is intended to support Local Plans at the national level by addressing issues that apply across most areas and will carry the same weight as local plans (in the event of conflict between the development plan and the relevant national development management policy the latter will have primacy);
- strengthen the role of the 'national model design code', to ensure that locally informed and clear design standards are in place in all parts of the country;
- require local planning authorities to produce a 'design code' for their area which will have full weight in making decisions on development and which will include the requirement for developers to produce EORs. It is intended that such area-wide codes will act as a framework, for which subsequent detailed design codes can come forward, prepared for specific areas or sites and led either by the local planning authority, neighbourhood planning groups or by developers as part of planning applications;
- introduce Environmental Outcome Reports (EORs). This will be a new system of evaluating the environmental impacts of plans and projects and replace the current EU-derived processes of SEA and EIA;
- repeal the 'Duty to Cooperate' and replace it with a more 'high-level' approach, which might include standard steps which each authority needs to take in their plan-making.
- replace supplementary planning documents (SPD) with 'Supplementary Plans';
- introduce Neighbourhood Priorities Statements as a neighbourhood planning tool in order to provide communities with a simpler way to set out the community's key priorities and preferences for their local areas. These would need to be taken into account by local planning authorities when preparing their Local Plan.
- make amendments to the NPPF which remove the current requirement for a rolling five-year supply of housing land, where the local plan is up to date i.e. for the first five years of the plan.
- introduce a street vote system giving residents the chance to propose new developments, such as extensions to an existing house, and hold votes on whether they should be given planning permission;
- introduce a new infrastructure levy for developers to pay, charged on the value of property when sold by the developer with rates and thresholds set locally by planning authorities.
- make changes to compulsory purchase orders to support the green regeneration of brownfield sites.
- digitally transform planning services to increase the use of high-quality data and digital services, including new powers to require compliance with data standards and make planning data publicly available; and
- strengthen enforcement powers for local authorities.

3.19 There are no new climate measures in the Draft Bill, either in relation to the Government's roadmap to net zero or in terms of planning measures to respond or adapt to dangerous climate change.

Environment Act 2021 (mandatory Biodiversity Net Gain and Local Nature Recovery Strategies)

3.20 The Environment Act 2021 sets out an overarching ambition to halt species decline by 2030 and increase species abundance by the end of 2042. The Act strengththens the duty on local authorities to conserve and enhance biodiversity as part of exercise of all their functions and introduced a new system of Local Nature Recovery Strategies

3.21 One of the key provisions of the Act is the introduction of mandatory Biodiversity Net Gain (BNG) under which the majority of new developments (with some exceptions such as permitted development) will be required via planning system to deliver at least a 10% net gain on the existing site baseline value for biodiversity. Having originally been scheduled for November 2023, BNG is now due to come into force from January 2024.

3.22 Based on the outcome of Government consultations on BNG, it is anticipated that the lower threshold for triggering the BNG requirement is where the proposed development will impact at least 25m² of existing habitat. Sutton's current Local Plan sets this threshold much higher at 100m², so the total number of developments requiring a BNG assessment and plan will increase significantly.

Energy Act 2023

3.23 The Energy Act 2023 aims to progress Government commitments in the British Energy Security Strategy and the Ten Point Plan for a Green Industrial Revolution, which identify the following three aims (i) transformation of energy security (ii) supporting the delivery of net zero; and (iii) Ensuring affordability of household bills The Act also implements proposals contained in 'Powering up Britain: Net Zero Growth Plan' (the NZG Plan), published by the Department for Energy Security and Net Zero in March 2023.

3.24 The Energy Act sets out new provisions for the regulation of heat networks which are expected to transform the way that networks, such as the Sutton Decentralised Energy Network (SDEN), are deployed to serve commercial premises, public buildings and homes across the UK. Key changes include:

- appointing Ofgem as heat networks regulator with new enforcement powers;
- a requirement on heat network operators to apply for heat network authorisation from Ofgem to operate;
- mandatory minimum technical standards and decarbonisation requirements;
- fair and transparent pricing; and
- heat network zoning.

3.25 Heat network zoning will empower local authorities as 'zone coordinators' to identify and designate areas best suited for heat networks based on their understanding of current and future demand in the local area, grid capacity and constraints, and the needs of other future development projects. Zone coordinators, such as LB Sutton, will have an exclusive right to design, construct and operate a district heat network within a zone. Once a zone has been designated, it will be mandatory for certain types of building – including new buildings, large public sector or private buildings and dwellings.

National Planning Policy Framework (NPPF)

3.26 The National Planning Policy Framework (NPPF)¹⁵, which was last updated in December 2023, sets out the Government's planning policies for England and how these should be applied. It provides a framework within which locally-prepared plans for housing and other development must be produced. The NPPF must therefore be taken into account in preparing the Local Plan, and is a material consideration in planning decisions.

3.27 The NPPF states that the purpose of the planning system is to contribute to the achievement of sustainable development by addressing the following three overarching objectives:

- **an economic objective** – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
- **a social objective** – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-

¹⁵ the current version of the NPPF (December 2023) is available at <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and

- **an environmental objective** – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

3.28 A 'presumption in favour of sustainable development' lies at heart of the NPPF (Para 11).

3.29 A number of significant changes have been proposed in order to align national planning policy with the Levelling-up and Regeneration Act (see above)

Housing Need

3.30 More flexibility is introduced to the requirements placed upon local planning authorities to plan for objectively assessed housing need. While the presumption in favour of sustainable development remains, albeit a new caveat is inserted which, for plan making, would prevent local planning authorities from having to meet housing need in full, where doing so would mean building densities that are 'significantly out of character with the existing area'. How the character of a particular locality is established will come through Design Codes.

3.31 In terms of the method calculating housing need, the Standard Method is now classified as 'advisory' and 'a starting-point for establishing a housing requirement for the area'. There is a clear statement to direct housing growth within sustainable urban centres.

3.32 The requirement to provide for a five-year housing land supply would only apply where the housing requirement set out in strategic policies becomes more than five years old; and this five-year supply should take into account previous under or over supply. The existing 'buffer' to the LPAs five-year housing land supply (which currently imposes an additional homes provision on top of the calculated requirement) can be removed in circumstances where there is clear evidence of over-delivery of housing in the area.

3.33 The 'justified' test of soundness for examining local plans is also removed from the draft NPPF, thus reducing the amount of evidence required of local planning authorities during the plan-making process. Local plans only need to meet the area's objectively assessed needs 'as far as possible'.

3.34 On Green Belt, a new insertion proposes that 'Green Belt boundaries are not required to be reviewed and altered if this would be the only means of meeting the objectively assessed need for housing over the plan period.'

Design

3.35 The emphasis on design has been strengthened further, with a focus on 'beautiful design' throughout the draft NPPF and the requirement for local planning authorities to bring forward 'positively prepared' design codes for their area.

Climate change and zero carbon

3.36 While the updated NPPF places greater weight to promoting energy efficiency improvements in existing buildings and supporting proposals to extend the life of existing renewable energy sites, many key climate policy issues of importance to delivering a zero carbon economy which is fully adapted to the impacts of climate change are either not updated or not addressed at all.

Flood risk management

3.37 The key changes relevant to flood risk management issues introduced in the previous 2021 revision to the NPPF and carried forward in the current version are:

- ensuring that plans consider all sources of flood risk;
- encouraging the use of improvements in green infrastructure and nature-based flood management (NFM) within developments to reduce the causes and impacts of flooding;
- incorporating appropriate flood resistant and resilient measures within developments to ensure they can quickly return to use after flood events without the need for significant refurbishment;
- inclusion of the Government's Flood Risk Vulnerability Classifications within Annex 3 to the NPPF itself.

3.38 The NPPF emphasises the importance of strategic flood risk assessments (SFRA)s and their roles in planning

and flood risk, stating the following:

“Strategic policies should be informed by a strategic flood risk assessment, and should manage flood risk from all sources. They should consider cumulative impacts in, or affecting, local areas susceptible to flooding, and take account of advice from the Environment Agency and other relevant flood risk management authorities, such as lead local flood authorities and internal drainage boards.”

3.39 The NPPF goes on to highlight the role of the Sequential and Exception Tests as a tool to encourage new development proposals to be located within areas that are at the lowest flood risk. Local Plans should consider the current and future impacts of climate change. Where climate change may increase flood risk and the long-term sustainability of some existing development, opportunities should be sought to relocate the development. Major developments should incorporate sustainable drainage systems (SuDS) as part of their drainage scheme proposals unless sufficient justification can be provided that it would be inappropriate. The proposed SuDS within these major developments must consider advice provided by Lead Local Flood Authorities (LLFAs), have appropriate minimum operational standards and maintenance arrangements, and provide multi-functional benefits where possible.

National Planning Practice Guidance (NPPG)

3.40 It is noteworthy that a comprehensive update to the flood risk and coastal change section was introduced in August 2022. Given the key role of the SA process (together with the strategic flood risk assessment or SFRA) in demonstrating that all site allocations proposed for inclusion in the Local Plan are in compliance with the ‘sequential’ and ‘exception’ tests, some of the key changes¹⁶ are outlined below:

Key details

- the ‘design flood’ now explicitly includes an allowance for climate change, and also accounts for surface water flood risk (Para 002);
- the starting point for the functional floodplain (i.e. Zone 3b) is now 3.3% AEP and not 5% as previously; and
- the lifetime of non-residential development is now set at 75 years (Para 006).

Sequential Test

- more clarity is provided on when the sequential test needs to be applied and about ‘minor’ (Para 027);
- key terms are defined e.g. ‘reasonably available’, ‘wider sustainable development objectives’;
- roles and responsibilities are more clearly defined with particular emphasis on local planning authorities to choose the area of search and consider if the sequential test is passed (Para 029);
- encouragement for more cross-boundary working (Para 025);
- clearer guidance on how should the Sequential Test be applied to planning applications (Para 027);
- greater clarity about when it is appropriate to move onto the Exception Test (Para 031);
- suggested approaches are included to improve certainty and efficiency, e.g. prepare guidance on areas of search and a register of ranked sites; and
- guidance on who is responsible for deciding if a planning application passes the Sequential Test? (Para 029).

Exception Test

- Table 2 of the updated guidance (previously table 3) now refers to flood zone ‘incompatibility’ not whether or not ‘development is appropriate’ (Table 2); and
- further guidance is included on key terms such as ‘wider sustainability benefits to the community’ and ‘reduce flood risk overall, where possible’ (Para 036) and on how it can be demonstrated that development will ‘reduce flood risk overall’ (Para 037).

Integrated approach

- a ‘catchment based’ and integrated approach is encouraged; and
- stronger links to other strategies e.g. water cycle studies and drainage & wastewater management plans (Para 010).

¹⁶ further details of changes to NPPG relating to flood risk and coastal change are set out in an Environment Agency Briefing Note available at <https://www.susdrain.org/files/News/Flood-risk-and-coastal-change-PPG-update-briefing-note-v2.pdf>

Impact of development on flood risk elsewhere

- FRAs need to detail any increases in flood risk elsewhere (Para 049);
- further guidance on compensatory floodplain storage and clarity that stilts or voids should not be relied upon for this purpose (Para 049); and
- further guidance on mitigating cumulative impacts on flood risk elsewhere (Para 049, 050 and 051).

Safeguarding land & relocation of unsustainable development

- more detailed guidance is provided on how to safeguard land for future flood risk management infrastructure (Para 011) and on the approach that should be taken in making provision for the relocation of development and infrastructure? (Para 012);
- unsustainable locations are defined (Para 012);
- further guidance on controlling development in unsustainable locations (Para 012);
- improved guidance on the role of planning in relocation of unsustainable development (Para 012);
- Adaptation Plans are now cited as a source of information about land likely to need to be safeguarded (Para 011).

Sustainable drainage systems (SuDS)

- the definition of sustainable drainage systems (SuDS) definition now requires four 'pillars to be met: SuDS must also discourage reliance on below ground storage.
- where SuDS are not proposed, there is now a clear onus on developer to provide clear evidence that the use of SuDS would be inappropriate;
- there is now a clear requirement for with planning applications to be accompanied by a SuDS Strategy and a more detailed list of information requirements is provided;
- there is wider acknowledgement of the the benefits of SuDS for cooling, carbon sequestration, biodiversity net gain etc.
- early consideration of SuDS is further encouraged;
- local policies are encouraged where certain types of SuDS would bring the greatest benefits

Reducing the causes and impacts of flooding

- a new section with links to all of the EA's latest Natural Flood Management tools, maps and research (Para 064);
- support for river restoration such as culvert removal and other 'slow the flow' approaches (Para 064)

National Strategies and Programmes

Net Zero Strategy – Build Back Greener (BEIS, October 2021)

3.41 In seeking to meet the UK's international climate commitments under COP26, the UK 'Net Zero Strategy – Build Back Greener' sets out the Government's long-term plan for delivering a zero carbon economy by 2050. A delivery pathway is set out showing indicative emissions reductions across each sector of the economy to meet national targets up to and including the sixth carbon budget (2033-2037). Some of the key policies and proposals of relevance to Sutton's new Local Plan are set out below:

- by 2035 the UK will be powered entirely by clean electricity, subject to security of supply;
- developing 40GW of offshore wind by 2030, with more onshore, solar, and other renewables;
- an ambition that by 2035, no new gas boilers will be sold;
- a new £450 million three-year Boiler Upgrade Scheme will see households offered grants of up to £5,000 for low-carbon heating systems so they cost the same as a gas boiler now.
- a new £60 million Heat Pump Ready programme that will provide funding for pioneering heat pump technologies and will support the government's target of 600,000 installations a year by 2028.
- further funding for the Social Housing Decarbonisation Scheme and Home Upgrade Grants, investing £1.75 billion. Additional funding of £1.425 billion for Public Sector Decarbonisation, with the aim of reducing emissions from public sector buildings by 75% by 2037;
- a zero emission vehicle mandate in order to deliver on the Government's 2030 commitment to end the sale of new petrol and diesel cars, and a further commitment that by 2035, all cars must be fully zero emissions capable.

- further funding of £620 million for zero emission vehicle grants and EV Infrastructure
- £3 billion to create integrated bus networks, more frequent services and bus lanes to speed journeys. • Transformation of local transport systems, with 4,000 new zero emission buses and the infrastructure to support them, and a net zero rail network by 2050, with the ambition to remove all diesel-only trains by 2040..
- boost the existing £640 million Nature for Climate Fund with a further £124 million of new money, ensuring total spend of more than £750 million by 2025 on peat restoration, woodland creation and management – above and beyond what was promised in the manifesto.
- contribute to the UK's target of increasing tree planting rates to 30,000 ha per year by the end of the Parliament.
- deliver at least £1.5 billion of funding to support net zero innovation projects.
- publish an annual progress update against a set of key indicators for achieving our climate goals

UK Government 25 Year Environment Plan

3.42 The Government's Environment Plan 'A Green Future: Our 25 Year Plan to Improve the Environment' (DEFRA, 2019), sets out the following strategic goals and targets jii

Goal 1: Clean air.

Achieve clean air by:

- meeting legally binding targets to reduce emissions of five damaging air pollutants; this should halve the effects of air pollution on health by 2030
- ending the sale of new conventional petrol and diesel cars and vans by 2040;
- maintaining the continuous improvement in industrial emissions by building on existing good practice and the successful regulatory framework.

Goal 2: Clean and plentiful water.

- achieve clean and plentiful water by improving at least three quarters of our waters to be close to their natural state as soon as is practicable;
- reducing the damaging abstraction of water from rivers and groundwater, ensuring that by 2021 the proportion of water bodies with enough water to support environmental standards increases from 82% to 90% for surface water bodies and from 72% to 77% for groundwater bodies
- reaching or exceeding objectives for rivers, lakes, coastal and ground waters that are specially protected, whether for biodiversity or drinking water as per our River Basin Management Plans
- supporting OFWAT's ambitions on leakage, minimising the amount of water lost through leakage year on year, with water companies expected to reduce leakage by at least an average of 15% by 2025; and
- minimising by 2030 the harmful bacteria in our designated bathing waters and continuing to improve the cleanliness of our waters; we will make sure that potential bathers are warned of any short-term pollution risks

Goal 3: Thriving plants and wildlife

- achieve a growing and resilient network of land, water and sea that is richer in plants and wildlife;
- restoring 75% of our one million hectares of terrestrial and freshwater protected sites to favourable condition, securing their wildlife value for the long term;
- creating or restoring 500,000 hectares of wildlife-rich habitat outside the protected site network, focusing on priority habitats as part of a wider set of land management changes providing extensive benefits;
- taking action to recover threatened, iconic or economically important species of animals, plants and fungi; and
- increasing woodland in England in line with our aspiration of 12% cover by 2060: this would involve planting 180,000 hectares by end of 2042

Goal 4: A reduced risk of harm from environmental hazards such as flooding and drought.

- reduce the risk of harm to people, the environment and the economy from natural hazards including flooding, drought and coastal erosion;
- making sure everyone is able to access the information they need to assess any risks to their lives and livelihoods, health and prosperity posed by flooding and coastal erosion;
- bringing public, private and third sectors together to work with communities & individuals to reduce risk of harm;

- making sure that decisions on land use, including development, reflect the level of current and future flood risk;
- ensuring interruptions to water supplies are minimised during prolonged dry weather and drought; and
- boosting the long-term resilience of our homes, businesses and infrastructure.

Goal 5: Using resources from nature more sustainably and efficiently.

- we will ensure that resources from nature, such as food, fish and timber, are used more sustainably and efficiently. We will do this by:
- maximising the value and benefits we get from our resources, doubling resource productivity by 2050
- improving our approach to soil management: by 2030 we want all of England's soils to be managed sustainably, and we will use natural capital thinking to develop appropriate soil metrics and management approaches
- increasing timber supplies
- ensuring that all fish stocks are recovered to and maintained at levels that can produce their maximum sustainable yield
- ensuring that food is produced sustainably and profitably

Goal 6: Enhanced beauty, heritage and engagement with the natural environment

- conserving and enhancing the beauty of our natural environment, and make sure it can be enjoyed, used by and cared for by everyone;
- safeguarding and enhancing the beauty of our natural scenery and improving its environmental value while being sensitive to considerations of its heritage;
- making sure that there are high quality, accessible, natural spaces close to where people live and work, particularly in urban areas, and encouraging more people to spend time in them to benefit their health and wellbeing; and
- focusing on increasing action to improve the environment from all sectors of society;

Goal 7: Mitigating and adapting to climate change

- taking all possible action to mitigate climate change, while adapting to reduce its impact;
- continuing to cut greenhouse gas emissions including from land use, land use change, the agriculture and waste sectors and the use of fluorinated gases;
- making sure that all policies, programmes and investment decisions take into account the possible extent of climate change this century;
- implementing a sustainable and effective second National Adaptation Programme

Goal 8: Minimising waste

- minimising waste, reusing materials as much as we can and manage materials at the end of their life to minimise the impact on the environment;
- working towards our ambition of zero avoidable waste by 2050;
- working to a target of eliminating avoidable plastic waste by end of 2042;
- meeting all existing waste targets – including those on landfill, reuse and recycling – and developing ambitious new future targets and milestones;
- seeking to eliminate waste crime and illegal waste sites..., prioritising those of highest risk;
- significantly reducing and where possible preventing all kinds of marine plastic pollution – in particular material that came originally from land

Goal 9: Managing exposure to chemicals

- making sure that chemicals are safely used and managed, and that the levels of harmful chemicals entering the environment (including through agriculture) are significantly reduced;
- seeking in particular to eliminate the use of Polychlorinated Biphenyls by 2025, in line with our commitments under the Stockholm Convention;
- reducing land-based emissions of mercury to air and water by 50% by 2030;
- substantially increasing the amount of Persistent Organic Pollutants material being destroyed or irreversibly transformed by 2030, to make sure there are negligible emissions to the environment;
- fulfilling our commitments under the Stockholm Convention.

Goal 10: Enhancing biosecurity

- enhancing biosecurity to protect our wildlife and livestock, and boost the resilience of plants and trees;
- managing and reducing the impact of existing plant and animal diseases; lowering the risk of new ones and tackling invasive non-native species;
- reaching the detailed goals to be set out in the Tree Health Resilience Plan of 2018;
- ensuring strong biosecurity protection at our borders, drawing on the opportunities leaving the EU provides;
- working with industry to reduce the impact of endemic disease.

3rd UK National Adaptation Programme 2023-28 (DEFRA, July 2023)

3.43 The UK Third National Adaptation Programme 2023-28¹⁷ updates the Government's strategy for adapting to climate impacts and for making make the country more resilient to climate change. Key risk¹⁸ and actions include:

Infrastructure

- as set out in the new Resilience Framework, the government will deliver a strategic, whole of society approach to resilience, including new commitments on resilience standards;
- DEFRA will drive £2.2bn of accelerated investment in water quality and resilient supply through the Plan for Water, helping to safeguard our water supply from the risks posed by the changing climate;
- the DfT will consult on a new transport adaptation strategy, which will take a holistic approach to addressing climate risks to transport.

Natural environment

- DEFRA will take account of climate trends and hazards affecting local areas through Local Nature Recovery Strategies;
- DEFRA will incorporate climate change adaptation into the design of Environmental Land Management schemes to promote resilient and sustainable land management and farming practices
- the government launched the second round of Landscape Recovery in May 2023, which are focussed on supporting net zero, protected sites, and wildlife-rich habitats; and
- Natural England will launch Six Nature Recovery Projects in 2023 and Defra will work with Nature Recovery Network delivery partners to identify and launch another 13 projects.

Health, communities and the built environment

- the Government will protect communities and businesses across England through a £5.2 billion investment in flood and coastal erosion schemes o the UK Health Security Agency will continue to deploy the Adverse Weather & Health Plan alongside the UK weather health alerting systems to protect lives and wellbeing. NPPF will be updated to support both adaptation and mitigation efforts, in addition to recent updates to Building Regulations to reduce excess heat and unwanted solar gains in all new residential buildings;
- the Government will provide dedicated local climate projections service to each upper tier local authority to support local adaptation planning on hazards such as heatwaves, and short-term, localised heavy rainfall.

Business and industry

- the Government will work with industry, regulators and public finance institutions to deliver the Green Finance Strategy 2023, which sets out a range of actions being taken to protect the financial system from climate-driven impacts and to attract private investment into adaptation; and
- the Department for Business and Trade (DBT) will publish a new strategy on supply chains and imports in the autumn, to strengthen our ability to respond to threats to critical imports, such as from climate change o the Department for Business and Trade will survey business readiness for climate impacts and work with other departments to provide information and support to businesses on adapting to higher temperatures, water scarcity, storms and flooding.

¹⁷ the 3rd UK National Adaptation Programme 2023-28 is available at <https://www.gov.uk/government/publications/third-national-adaptation-programme-nap3#:~:text=The%20National%20Adaptation%20Programme%20sets,the%20Climate%20Change%20Act%202008>.

¹⁸ key climate change risks to be addressed in the 3rd National Adaptation Programme are identified in the risk assessment exercise undertaken in 2017 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1171134/NAP3_Annex_1_Climate_risks_and_opportunities.pdf

International impacts

- the government will help adapt and build resilience in vulnerable communities to climate related disasters, including through the tripling of adaptation funding through Official Development Assistance to £1.5bn in 2025, as outlined in the International Climate Finance Strategy; and
- the government will continue to drive international action and consensus in negotiations on climate adaptation

Adaptation Reporting Power

3.30 Chapter 8 of the Third National Adaptation Programme sets out the government's strategy for the fourth round of climate adaptation reporting and fulfils the requirements set out in the Climate Change Act by:

- making reporting more effective by realigning adaptation reporting with other parts of the government's statutory cycle, ensuring that the valuable evidence contained in these reports is able to inform the government's fourth Climate Change Risk Assessment
- streamlining requirements to minimise the reporting burden whilst balancing the need for reports to provide valuable insights in a shortened timeframe;
- exploring targeted scope expansion to include additional reporting on canals and reservoirs, health and social care, and food supply. This will include inviting new bodies, such as the Canal and River Trust, to report, and identifying appropriate new reporting organisations in the agriculture and food sector. We will also ask existing reporting bodies to cover certain aspects of their remits more fully, for example NHS England's role in social care. We will also pilot an approach to reporting by local authorities.
- Annex 4 of the Third National Adaptation Programme sets out details of the scope for the next round of reporting.

National Flood and Coastal Erosion Risk Management Strategy for England 2020

3.31 The Flood and Water Management Act 2010 places a statutory duty on the Environment Agency (EA) to develop a National Flood and Coastal Erosion Risk Management Strategy for England.

3.32 The latest strategy, updated in 2020 identifies what needs to be done by all risk management authorities (RMAs), including the EA, the Environment Agency, lead local flood authorities (LLFAs), local planning authorities, highways authorities and water and sewerage companies, in order to better manage the risks and consequences of all sources of flooding. This strategy's long-term vision is for 'a nation ready for, and resilient to, flooding and coastal change – today, tomorrow and to the year 2100. It has 3 long-term ambitions, underpinned by evidence about future risk and investment needs. They are:

- climate resilient places: working with partners to bolster resilience to flooding and coastal change across the nation, both now and in the face of climate change;
- today's growth and infrastructure resilient in tomorrow's climate: making the right investment and planning decisions to secure sustainable growth and environmental improvements, as well as infrastructure resilient to flooding and coastal change; and
- a nation ready to respond and adapt to flooding and coastal change: ensuring local people understand their risk to flooding and coastal change, and know their responsibilities and how to take action.

3.33 Alongside the final Strategy, the EA has developed an FCERM Roadmap to 2026, published in 2022. This roadmap has been developed between the EA and partners including National Highways and the National Flood Forum to set out various practical actions to be undertaken up until 2026, with completion of these actions helping ensure progress towards implementing the Strategy's 2100 vision. The next review for the Strategy is planned for 2026, with the EA planning to review and update the shorter-term measures to ensure everything remains on track to support the Strategy's vision and longer-term objectives:

LONDON AND SUB-REGIONAL CONTEXT

London Plan 2021

3.34 The London Plan (GLA, 2021) is the spatial development strategy for Greater London and forms part of the statutory development plan for each Borough. Sutton's new Local Plan must therefore be in general conformity with it. The London Plan sets out a strategic framework for how London will develop over the next 20-25 years and for delivering the Mayor's Vision for 'Good Growth' – defined as growth that is socially and economically inclusive at the same time as being environmentally sustainable. Each of the policy areas of the plan is informed by the following six 'Good Growth' objectives set out under Policies GG1 to GG6.

GG1 Building strong and inclusive communities

Good growth is inclusive growth. To build on the city's tradition of openness, diversity and equality, and help deliver strong and inclusive communities, those involved in planning and development must:

- A encourage early and inclusive engagement with stakeholders, including local communities, in the development of proposals, policies and area-based strategies*
- B seek to ensure changes to the physical environment to achieve an overall positive contribution to London*
- C provide access to good quality community spaces, services, amenities and infrastructure that accommodate, encourage and strengthen communities, increasing active participation and social integration, and addressing social isolation*
- D seek to ensure that London continues to generate a wide range of economic and other opportunities, and that everyone is able to benefit from these to ensure that London is a fairer, more inclusive and more equal city*
- E ensure that streets and public spaces are consistently planned for people to move around and spend time in comfort and safety, creating places where everyone is welcome, which foster a sense of belonging, which encourage community buy-in, and where communities can develop and thrive*
- F promote the crucial role town centres have in the social, civic, cultural and economic lives of Londoners, and plan for places that provide important opportunities for building relationships during the daytime, evening and night time*
- G ensure that new buildings and the spaces they create are designed to reinforce or enhance the identity, legibility, permeability, and inclusivity of neighbourhoods, and are resilient and adaptable to changing community requirements*
- H support and promote the creation of a London where all Londoners, including children and young people, older people, disabled people, and people with young children, as well as people with other protected characteristics, can move around with ease and enjoy the opportunities the city provides, creating a welcoming environment that everyone can use confidently, independently, and with choice and dignity, avoiding separation or segregation*
- I support and promote the creation of an inclusive London where all Londoners, regardless of their age, disability, gender, gender identity, marital status, religion, race, sexual orientation, social class, or whether they are pregnant or have children, can share in its prosperity, culture and community, minimising the barriers, challenges and inequalities they face*

GG2 Making the best use of land

To create successful sustainable mixed-use places that make the best use of land, those involved in planning and development must:

- A enable the development of brownfield land, particularly in Opportunity Areas, on surplus public sector land, and sites within and on the edge of town centres, as well as utilising small sites*
- B prioritise sites which are well-connected by existing or planned public transport*
- C proactively explore the potential to intensify the use of land to support additional homes and workspaces, promoting higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling*
- D applying a design-led approach to determine the optimum development capacity of sites*
- E understand what is valued about existing places and use this as a catalyst for growth, renewal, and place-making, strengthening London's distinct and varied character*
- F protect and enhance London's open spaces, including the Green Belt, Metropolitan Open Land, designated nature conservation sites and local spaces, and promote the creation of new green infrastructure and urban greening, including aiming to secure net biodiversity gains where possible*

- G plan for good local walking, cycling and public transport connections to support a strategic target of 80 per cent of all journeys using sustainable travel, enabling car-free lifestyles that allow an efficient use of land, as well as using new and enhanced public transport links to unlock growth
- H maximise opportunities to use infrastructure assets for more than one purpose, to make the best use of land and support efficient maintenance.

GG3 Creating a healthy city

To improve Londoners' health and reduce health inequalities, those involved in planning and development must:

- A ensure that the wider determinants of health are addressed in an integrated and co-ordinated way, taking a systematic approach to improving the mental and physical health of all Londoners and reducing health inequalities
- B promote more active and healthy lives for all Londoners and enable them to make healthy choices
- C use the Healthy Streets Approach to prioritise health in all planning decisions
- D assess the potential impacts of development proposals and Development Plans on the mental and physical health and wellbeing of communities, in order to mitigate any potential negative impacts, maximise potential positive impacts, and help reduce health inequalities, for example through the use of Health Impact Assessments
- E plan for appropriate health and care infrastructure to address the needs of London's changing and growing population
- F seek to improve London's air quality, reduce public exposure to poor air quality and minimise inequalities in levels of exposure to air pollution
- G plan for improved access to and quality of green spaces, the provision of new green infrastructure, and spaces for play, recreation and sports
- H ensure that new buildings are well-insulated and sufficiently ventilated to avoid the health problems associated with damp, heat and cold
- I seek to create a healthy food environment, increasing the availability of healthy food and restricting unhealthy options.

GG4 Delivering the homes Londoners need

To create a housing market that works better for all Londoners, those involved in planning and development must:

- A ensure that more homes are delivered
- B support the delivery of the strategic target of 50 per cent of all new homes being genuinely affordable
- C create mixed and inclusive communities, with good quality homes that meet high standards of design and provide for identified needs, including for specialist housing
- D identify and allocate a range of sites to deliver housing locally, supporting skilled precision-manufacturing that can increase the rate of building, and planning for all necessary supporting infrastructure from the outset
- E establish ambitious and achievable build-out rates at the planning stage, incentivising build-out milestones to help ensure that homes are built quickly and to reduce the likelihood of permissions being sought to sell land on at a higher value.

GG5 Growing a good economy

To conserve and enhance London's global economic competitiveness and ensure that economic success is shared amongst all Londoners, those involved in planning and development must:

- A promote the strength and potential of the wider city region
- B seek to ensure that London's economy diversifies and that the benefits of economic success are shared more equitably across London
- C plan for sufficient employment and industrial space in the right locations to support economic development and regeneration
- D ensure that sufficient high-quality and affordable housing, as well as physical and social infrastructure is provided to support London's growth
- E ensure that London continues to provide leadership in innovation, research, policy and ideas, supporting its role as an international incubator and centre for learning
- F promote and support London's rich heritage and cultural assets, and its role as a 24-hour city
- G make the fullest use of London's existing and future public transport, walking and cycling network, as well as its network of town centres, to support agglomeration and economic activity
- H recognise and promote the benefits of a transition to a low carbon circular economy to strengthen London's economic success.

GG6 Increasing efficiency and resilience

To help London become a more efficient and resilient city, those involved in planning and development must:

- A seek to improve energy efficiency and support the move towards a low carbon circular economy, contributing towards London becoming a zero carbon city by 2050
- B ensure buildings and infrastructure are designed to adapt to a changing climate, making efficient use of water, reducing impacts from natural hazards like flooding and heatwaves, while mitigating and avoiding contributing to the urban heat island effect
- C create a safe and secure environment which is resilient the impact of emergencies including fire and terrorism
- D take an integrated and smart approach to the delivery of strategic and local infrastructure by ensuring that public, private, community and voluntary sectors plan and work together.

3.35 While there is not sufficient space as part of this Scoping Report to describe the detail of each London Plan policy, the following key performance indicators (KPIs) and strategic targets must be taken into account when developing Sutton's sustainability appraisal (SA) framework (see Section 6) and subsequently in identifying Local Plan issues and preferred options at the Regulation 18 consultation stage.

Table 3.1: London Plan 2021 Monitoring Framework

London Plan 2021 - Key Performance Indicators and Targets	
KPI Supply of new homes	Increase in the supply of new homes over the period ...towards meeting the 66,000 net additional homes needed each year up to March 2029. (Target for LB Sutton: 4,690 net additional dwellings over 10-year period from 2019-20 to 2020-29 or 469 per annum)
KPI Supply of affordable homes	Positive trend in percentage of planning approvals for housing that are affordable housing (based on a rolling average).
KPI Supply of office capacity	Pipeline of planning permissions for office floorspace is at least three times the average office floorspace construction started over the previous three years.
KPI Provision of affordable workspace	Positive trend in affordable B1 workspace as a share of total B1 floorspace in planning approvals (based on a rolling average).
KPI Availability of industrial land	No overall net loss of industrial and warehousing floorspace in London (B1c, B2 and B8) in designated industrial locations (based on a rolling average).
KPI Protection of Green Belt and Metropolitan Open Land	Harm to the Green Belt and Metropolitan Open Land prevented through the referred application process.
KPI Carbon emissions through new development	Average on-site carbon emission reductions of at least 35% compared to Building Regulations 2013 for approved referable development applications.
KPI Modal share	Increasing mode share for walking, cycling and public transport (excluding taxis) towards the target of 80% by 2041.
KPI Londoners engaging in active travel	Positive trend in provision of cycle parking (based on a rolling average) to support the target of all Londoners doing two ten-minute periods of active travel a day by 2041.
KPI Air quality	Positive trend in approved referable development applications demonstrating that they meet at least air quality neutral standard for emissions (based on a rolling average).
KPI Impact of development on London's heritage	Positive trend in the reduction of harm and/or an increase in benefits to designated heritage assets in approved referable development applications (based on a rolling average).
KPI Provision of cultural infrastructure	No net loss of culture venues and facilities* (based on a rolling average).

Supplementary Planning Guidance (SPG)

3.36 The Mayor has also published the following London Plan Guidance (LPG), including 16 supplementary planning guidance (SPG) documents¹⁹ which were 'saved' when the London Plan was published in March 2021.

Good growth

- Accessible London: Achieving an Inclusive Environment SPG (GLA, 2014);
- SPG: Planning for Equality and Diversity in London (GLA, 2007).

Sustainable Infrastructure

- Air quality positive LPG (GLA, February 2023);
- Air quality neutral LPG (GLA, February 2023);
- Be Seen energy monitoring LPG (GLA, 2021)
- Circular economy statements LPG (GLA, Oct 2020)

¹⁹ over time, the London Plan Guidance (LPG) will update and replace the remaining SPG documents

Spatial development patterns

- London's Opportunity Areas²⁰ (including Sutton TC).

Design

- Character and Context SPG (GLA, 2014);
- Draft Fire safety LPG (GLA, February 2022);
- Public London Charter LPG (GLA, 2021);
- Draft Characterisation and Growth Strategy LPG (GLA, February 2022);
- Draft Housing Design Standards LPG (GLA, Feb 2022);
- Draft Optimising Site Capacity: A Design-led Approach LPG (GLA, February 2022);
- Draft Small Site Design Codes LPG (GLA, Feb 2022);.

Housing

- Affordable Housing and Viability SPG (GLA, 2017);
- Housing SPG (GLA, 2016); and
- Draft Large Scale Purpose Built Shared Living LPG (GLA, January 2022).

Social Infrastructure

- Play and Informal Recreation SPG (GLA, 2012); and
- Social Infrastructure SPG (GLA, May 2015).

Economy

- Industry and Logistics LPG

Heritage and culture

- London View Management Framework SPG (2012)

- Energy Assessment Guidance (GLA, June 2022)
- The control of dust and emissions in construction SPG (GLA, 2014);
- Whole life Carbon LPG (GLA, March 2022)

Transport

- Sustainable Transport, Walking and Cycling LPG (GLA, December 2022).

Funding the London Plan

- Crossrail funding SPG (GLA, 2016)
- Use of planning obligations in the funding of Crossrail, and the Mayoral Community Infrastructure Levy SPG (GLA, 2019).

Monitoring

- London Plan Annual Monitoring Reports²¹.

Practice Notes

- Practice note on wheelchair accessible student accommodation;
- Practice note on contaminated land;
- Practice note on First Homes;
- Practice note on industrial intensification;

Mayoral Strategies and Programmes

London Environment Strategy 2018

3.37 The London Environment Strategy (May 2018) sets out a vision for London in 2050 that seeks to “realise the potential of London’s environment to support good health and quality of life and to make the city a better place to live, work and do business”. The following key challenges are identified:

- **Air quality** – air pollution and its adverse impacts on health and quality of life is identified as the most pressing environmental threat to the future health of London. At the time the strategy was introduced, around 20% of primary schools were located in parts of London that breached legal air pollution limits;
- **Green space** – there has been a gradual loss of green space over recent years with development encroaching on green space and gardens being paved over. While (areas) have more green spaces than others, almost half of Londoners have poor access to parks. Access to good quality green space and living in greener neighbourhoods can have a big impact on people’s health and quality of life;
- **Biodiversity** - As green space has been lost and what remains has in some cases reduced in quality, areas of important habitat and the range of plants and animals that live in London have decreased
- **Climate change** – while London’s greenhouse gas emissions are falling, the London Environment Strategy identifies that the city remains over-reliant on the fossil. At the time of the adoption of the strategy (2018), London was not on track to reduce its emissions quickly enough to avoid the worst impacts of climate change, or to meet national and international climate aims (e.g. COP26);
- **Energy use** – As of 2018, nearly three quarters of the energy used in London’s homes is for heating and hot water, and most of this demand was being met using polluting gas-fired boilers. One in ten households were living in fuel poverty in 2018 (exacerbated by the Ukraine conflict and the cost of living crisis)

²⁰ details of London’s Opportunity Areas are available at <https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/opportunity-areas>

²¹ London Plan Annual Monitoring Reports are available at <https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/monitoring-london-plan>

- **Waste** –as of 2018, less than half of the 7m tonnes of waste that London’s homes and businesses produce each year was being recycled, and landfill capacity is set to run out by 2026. London needs to reduce, reuse and recycle more, to see waste as the valuable resource that it is, and to reduce London’s increasing waste bill as the city grows.
- **Flood risk** - the loss of green space, the expansion of impermeable surfaces used for roads, roofs and pavements, and an outdated drainage system leave London exposed to the risk of flooding. As climate change brings a rise in sea level and more intense rainfall, flooding will become increasingly likely.
- **Heat risk** Climate change is set to lead to heatwave conditions every summer by the middle of the century, and the Urban Heat Island effect makes the centre of London up to 10°C warmer than the rural areas around the city. Increasing heat risk could make homes, workplaces and public transport uncomfortable for all and dangerous for the most disadvantaged.
- **Water scarcity** - even with projected water efficiency gains, London is forecast to have a water resource ‘gap’ of over 100m litres per day by 2020, rising to a deficit of over 400m litres per day by 2040. London already gets a large proportion of its water from groundwater and surrounding rivers, which damages the health of rivers and threatens the city’s future water supply.

3.38 The Strategy sets out the Mayor’s ambition for London to be the “*world’s greenest global city*”, making it:

- **Greener:** The Strategy states that “*All Londoners should be able to enjoy the very best parks, trees and wildlife. Creating a greener city is good for everyone – it will improve people’s health and quality of life, support the success of businesses and attract more visitors to London. Action will be taken now to plant more trees, make green spaces more accessible, and ensure more green roofs and green features are designed into new developments. Local authorities and community groups will be supported to manage and value London’s parks and biodiversity better. This will help to make sure that more than half of London is green by 2050*”;
- **Cleaner:** The Strategy states that “*Londoners want their city to be clean, attractive and healthy – living in a big city does not mean they should accept a dirty and polluted environment. The Mayor will clean up London’s air, water and energy in a way that is fair, protects the health of Londoners, and contributes to the fight against climate change; and Action will be taken now to introduce less polluting buses, deter the most polluting vehicles from being driven in London, and clean up the air around schools and new developments. The roll out of sustainable drainage systems and improvements to the sewerage network will help keep the city’s rivers clean. The Mayor’s new Energy for Londoners programme will help Londoners and businesses to generate more renewable energy. This will help London’s buildings to be powered more cleanly, its entire transport system to become zero emission, and for London to be a zero carbon city by 2050*”.
- **Ready for the future:** The Strategy states that “*Water, energy and raw materials for the products we consume will be less readily available in the future, and climate change will mean higher temperatures, more intense rainfall and water shortages. The Mayor will make sure the city does not waste valuable resources, is prepared for the future, and is safeguarded for future generations. Action will be taken now to plan for new flood defences and new water resources for London, as well as to help transport, water and other infrastructure providers better prepare for the changing climate*”.

Mayor’s Economic Development Strategy for London 2018

3.39 The Mayor’s Economic Development Strategy for London 2018 sets out a large number of strategic goals and objectives aimed at delivering a fairer, more inclusive economy; creating the conditions for growth and supporting London’s sectors. Those which are most relevant to Sutton’s new Local Plan are highlighted below.

A FAIRER , MORE INCLUSIVE ECONOMY

3.40 Promote a **lower cost of living** by:

- working to increase the supply of genuinely affordable homes and help to make private renting more affordable;
- improving the accessibility and affordability of transport;
- supporting access to high quality early years education and childcare;

3.41 Promoting **inclusive and safe communities** by:

- promote the importance of well designed public spaces, buildings and housing;

- enabling the creation of more socially integrated places, which increase opportunities for Londoners to have positive shared experiences;
- implementing his Equality, Diversity and Inclusion Strategy and Strategy for Social Integration;
- delivering 'Vision Zero' through his Transport Strategy to help eliminate deaths and serious injury on London's transport system.

CREATING THE CONDITIONS FOR GROWTH

3.42 Promoting **space for business and work** by:

- ensuring there is sufficient supply of office accommodation and investment in transport and infrastructure;
- supporting vibrant local economies outside of central London, including successful town centres, markets, high streets and industrial areas;
- ensuring that London retains sufficient industrial land to keep the economy working efficiently; and
- supporting the provision of affordable and flexible workspace. ;

3.43 Promoting sustainable and active forms of Transport by

- creating a healthy street environment where people choose to walk, cycle and use public transport
- reducing car dependency and tackle congestion
- investing in London's public transport capacity; and
- using new transport schemes to unlock homes and jobs across London..

3.44 Promoting **infrastructure delivery** by::

- improving the planning, co-ordination and delivery of infrastructure;
- tackling the barriers to the provision of fast, reliable digital connectivity; •
- promoting an integrated approach to water management;
- helping create a smarter, more integrated energy system;
- protecting and enhancing London's natural capital to ensure London is a healthy, green and liveable city;
- promoting the concept of green infrastructure and natural capital accounting;
- promoting the growth of the circular economy and support businesses that adopt circular business models; and
- helping increase the flow of finance to address environmental challenges.

SUPPORTING LONDON'S SECTORS

3.45 Helping to address the major **healthcare challenges** facing society by

- promote London and the Wider South East as a pioneer of life science innovation; •
- support the growth of new life sciences developments (e.g. London Cancer Hub);.

3.46 Driving the transition to a **low carbon circular economy** by

- setting clear environmental ambitions to catalyse London's transition to a low carbon circular economy; and
- support households and businesses across all sectors and households to contribute to, participate in and benefit from London's transition to a low carbon circular economy;

Mayor's Transport Strategy 2018

3.47 The Mayor's Transport Strategy 2018 (MTS) sets out sets out the Mayor's policies and proposals to reshape transport in London over the next two decades (a supplementary proposal was added to it in November 2022. Three key themes are at the heart of the strategy:

- **healthy streets and healthy people** - creating streets and street networks that encourage walking, cycling and public transport use will reduce car dependency and the health problems it creates. There are ten principles underlying this approach - people choose to walk, cycle and use public transport; pedestrians from all walks of life; easy to cross: people feel safe; things to see and do; places to stop and rest; people feel relaxed; not too noisy; clean air; shade and shelter;
- **a good public transport experience** - public transport is the most efficient way for people to travel over distances that are too long to walk or cycle, and a shift from private car to public transport could dramatically reduce the number of vehicles on London's streets; and

- **new homes and jobs** - More people than ever want to live and work in London. Planning the city around walking, cycling and public transport use will unlock growth in new areas and ensure that London grows in a way that benefits everyone.

3.48 The central aim underpinning the Mayor's Vision for transport is to work with Boroughs and other stakeholders to reduce Londoners' dependency on cars in favour of active, efficient and sustainable modes of travel, with the aim for 80% of all trips in London to be made on foot, by cycle or public transport by 2041. Other key MTS aims are as follows:

- by 2041, for all Londoners to do at least the 20 minutes of active travel they need to stay healthy each day;
- no one to be killed in or by a London bus by 2030, and for deaths and serious injuries from all road collisions to be eliminated from the streets by 2041;
- to reduce freight traffic in the central London morning peak by 10% on current levels by 2026, and to reduce total London traffic by 10-15% by 2041;
- all new taxis to be zero emission capable from 2018 and all new Private Hire Vehicles (PHVs) from 2023, all new buses to be zero emission from 2025, all new cars and vans from 2030 and all other vehicles from 2040. (This would mean that all taxis and PHVs would be zero emission capable by 2033 at the latest, all buses; would be zero emission by 2037 and London's entire transport system would be zero emission by 2050)
- to open Crossrail 2²² by the early 2030s;
- to create a London suburban metro;
- to improve the overall accessibility of the transport system including, by 2041, halving the average additional time taken to make a public transport journey on the step-free network compared to the full network;
- to ensure that regeneration and new development schemes incorporate the Mayor's principles of 'Good Growth' (good access to public transport ; high-density, mixed-use developments; people choose to walk and cycle; car-free and car-lite places; inclusive, accessible design; carbon-free travel and efficient freight)..

3.49 The Mayor revised his strategy in November 2022 by adding a supplementary proposal to address the triple challenges of air quality, the climate emergency and traffic congestion through road user charging schemes, including by expanding the Ultra Low Emission Zone (ULEZ) across London.

London Regional Flood Risk Appraisal (2018)

3.50 First published by the GLA in 2009, the London Regional Flood Risk Appraisal (RFRA) (August 2014), and provides a strategic overview of all flooding sources in London. The document also addresses the probability and consequences of this flooding, including the potential consequences related to London's ongoing population growth.

3.51 A draft London RFRA was made available in September 2018, but the final version has not yet been published at the time of writing (July 2023). The document updates the 2014 London RFRA, and represents important evidence to underpin the 2021 London Plan. The document provides improved information and evidence for Local Plans, Opportunity Area Planning Frameworks, and infrastructure providers through the London RFRA's increased level of detail and the resultant mapping. The following revised set of monitoring recommendations are set out:

- Recommendation 1 – Tidal Flood Risk
- Recommendation 2 – Fluvial Flood Risk
- Recommendation 3 – Surface Water Flood Risk
- Recommendation 4 – Sewer Flood Risk
- Recommendation 5 – Groundwater Flood Risk
- Recommendation 6 – Reservoir Flood Risk
- Recommendation 7 – Flood Risk to Opportunity Areas and Town Centres
- Recommendation 8 – Flood Risk to Transport Infrastructure
- Recommendation 9 – Flood Risk to Emergency Services
- Recommendation 10 – Flood Risk to Schools
- Recommendation 11 – Flood Risk to Utility Infrastructure

²² further information on Crossrail 2 is available at <https://crossrail2.co.uk/>

3.52 These revised monitoring recommendations are intended to improve local risk policies and the activities of Drain London, which is a partnership group of key organisations responsible for managing London’s surface water flood risk and drainage assets. Sutton Council’s future Local Plan policies and documents should incorporate these recommendations.

Other Sub-Regional Strategies

3.53 Other relevant non-Governmental strategies at the sub-regional level include the Sutton and East Surrey Water Business Plan 2020-2025²³ and the Thames Water Strategic Business Plan: 2020-2025.²⁴

BOROUGH CONTEXT

Sutton Local Plan 2018

3.54 Following submission to the Secretary of State (April 2017), Examination-in-Public (September 2017), further consultation on the Main Modifications (December 2017 to January 2018) and publication of the Inspector’s Report (January 2018), Sutton’s current Local Plan to guide the future growth and development of the borough over the next 10-15 years from 2016-31 was adopted by the council on 26 February 2018.

3.55 The Local Plan supports the council’s long-term aspirations for the future development and growth of the borough by addressing the challenges, priorities and opportunities set out in the Sutton Plan 2018-2023²⁵, Sutton’s Economic Growth Prospectus²⁶ and a range of other council strategies. These include meeting future borough housing needs; providing sufficient employment land, retail, schools, community infrastructure and transport to accommodate expected household growth; attracting inward investment and new jobs; and delivering key strategic priorities such as the London Cancer Hub, the regeneration of Sutton Town Centre, Wandle Valley renewal and Sutton Link (formerly Tramlink).

3.56 The Local Plan takes a positive and proactive approach to growth and regeneration and demonstrates how the above priorities can be delivered in a way which is consistent with sustainability objectives, maximises benefits to residents, maintains local character where it is distinctive and ensures that adequate infrastructure is provided to support new development.

3.57 The Key Diagram illustrates the spatial strategy for the future development of the borough in terms of priority areas for growth and regeneration, strategic infrastructure improvements and environmental constraints:

Sutton’s Corporate Strategy – Ambitious for Sutton 2022-2027

3.58 ‘Ambitious for Sutton’, the London Borough of Sutton’s corporate plan²⁷, sets out the following priorities for the next five years..

Action on Climate Change

3.59 “By 2027 Sutton will be a sustainable, green borough, with everyone taking responsibility for their impact on the environment” by (i) reducing the Council’s and borough-wide carbon emissions (ii) Helping people make sustainable transport choices; and (iii) keeping Sutton a great place to live, enhancing the natural environment by caring for landscapes and wildlife transport choices.

3.60 Selected ‘Actions’ under this priority which are of relevance to Sutton’s new Local Plan include:

- delivering our Environment Strategy and Climate Emergency Response Plan and renewing it every year to reflect latest climate priorities, funding opportunities and innovation. This includes updating our Air Quality Action Plan;
- developing a Climate Financial Strategy to identify the funding needed to combat climate change, and seek to secure around £1m per year of external funding;

²³ the Sutton and East Surrey Business Plan 2020-2025 is available at <https://seswater.co.uk/about-us/publications/our-business-plan-for-2020-to-2025>

²⁴ the Thames Water Business Plan 2020-2025 is available at <https://www.thameswater.co.uk/media-library/home/about-us/regulation/our-five-year-plan/pr19/our-plan--summary-version.pdf>

²⁵ see <http://www.thesuttonplan.org/> for further details on the Sutton Plan (‘Ambitious for Sutton’)

²⁶ see Opportunity Sutton website at <https://www.opportunitysutton.org/> and Growth Prospectus at <https://www.opportunitysutton.org/wp-content/uploads/Growth-Prospectus.pdf>

²⁷ Sutton’s corporate plan is available at <https://www.sutton.gov.uk/ambitiousforsutton>

- exploring options to make Council buildings more energy-efficient and climate-friendly, and implementing a programme of changes. We will also support 50 Sutton businesses to reduce their impact on the climate through our new Green Enterprise Partnership in Sutton Town Centre, and use the latest technology to support our climate ambitions;
- lobbying the Government to deliver on their national commitments on the environment, including providing funding to councils to support decarbonisation at a local level;
- taking action to encourage and enable people to make sustainable transport choices in Sutton, including: delivering the Town Centre Public Realm Masterplan; delivering four new school streets around the borough by 2024; reviewing opportunities for 20mph areas and heavy lorry bans; developing and delivering cycle parking, cycle hangars and cycle lanes and continuing to deliver a cycle training programme; continuing the e-bike trial until October 2023 and working towards delivering a permanent solution; encouraging the uptake of Freedom Passes; exploring the use of pool cars, scooters and e-bikes for Council staff; and exploring innovative sustainable transport solutions, including demand responsive transport;
- identifying opportunities to increase the number of electric vehicle charging points in order to encourage the uptake of electric vehicles; explore options to convert the Council's small vehicle fleet to electric vehicles; require council contractors to use electric vehicles where suitable;
- minimising waste and work towards a 'circular economy' by: reviewing the Council's waste and recycling policies and strategies; focusing on key areas to improve recycling (including flats, and the street environment); and taking other measures to make it easier for residents to reduce waste, repurpose and repair items;
- continuing to provide a 'Library of Things' to allow customers to borrow household items such as drills, sewing machines, carpet cleaners and ice cream makers, in order to encourage reuse of items and reduce waste
- expanding the Sutton Decentralised Energy Network (SDEN);
- developing and delivering flood alleviation schemes in Worcester Park, Rosehill Park and Beddington (subject to funding);
- continuing to deliver the SuDS (sustainable urban drainage systems) programme in the borough's schools;
- converting all street lights to LED across the borough over four years, delivering significant financial savings and reducing carbon;
- work with the Conservation & Access Management Committee and landowners to ensure that each habitat defined in the Beddington Farmlands restoration management plan is restored in full by the end of 2023;
- continuing to plant more trees and hedgerows across the borough, and work with residents and other stakeholders to identify spaces for tree and hedgerow planting and bid for external funding;
- upgrading playgrounds, tennis courts and other parks facilities to encourage active lifestyles and working with sports bodies and clubs to provide a range of sports and leisure activities across the borough;
- sustaining and enhancing our existing parks and open spaces, and develop a new mini park (GreenSpaces project); and
- delivering a community led-project at the Limes Avenue Recreation Ground to increase green space where this is currently lacking.

An inclusive place for everyone

3.61 *“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”* by:

- continuing to promote equality and inclusion to make Sutton a great place for our diverse communities;
- focusing on mental health and supportive communities; and
- providing care and support to those people who need it most, and support people to remain independent as long as possible.

3.62 Selected Actions which are of relevance to the new Local Plan include:

- ensure enough school places for Sutton residents, including high-quality places for pupils with Special Educational Needs and Disabilities (SEND);
- provide inclusive playgrounds for children; and
- champion equality, diversity and inclusion across Sutton through strong partnerships.

Quality and Affordable Housing

3.63 *“By 2027, more people in Sutton will live in safe, high-quality, and affordable homes”* by:

- increasing the number of affordable homes in the borough by building new homes, regenerating council estates and exploring innovative ways to increase the housing supply
- ensuring that all Council housing is safe, sustainable and of good quality;
- working with partners to support people who are homeless or at risk of becoming homeless, intervening early before issues escalate.

3.64 Selected Actions which are of particular relevance to the new Local Plan include:

- delivering 405 new, low-carbon council homes at various locations across the borough by 2028
- making council homes more energy efficient by: ‘retrofitting’ 60 homes with the latest energy efficiency measures; ‘decarbonising’ 75 Council homes via the Social Housing Decarbonisation Fund programme; and securing external funding for delivery of further decarbonisation schemes;
- working with residents and communities to regenerate Council estates, complete delivery of the Beech Tree Place regeneration, progress regeneration of Elm Grove, complete an options appraisal for the regeneration of Benhill Estate and review the feasibility of regeneration for the remaining estates within the Estate Regeneration Programme;
- Increase the number of affordable private rented homes in Sutton;

Strong and fair economic growth

3.65 *“By 2027, Sutton will have more quality jobs and thriving local businesses. This will support our strong and fair economic growth”* by (i) supporting residents, communities and businesses to deal with the rising cost of living - with a focus on making Sutton stronger and fairer for everyone (ii) continuing to deliver major regeneration schemes, including Sutton Town Centre and the ground-breaking London Cancer Hub at Belmont; and (iii) backing local businesses and work to create more quality jobs for local people.

3.66 Selected corporate plan actions which are of particular relevance to the new Local Plan include:

- delivering 405 new, low-carbon council homes at various locations across the borough by 2028;
- working with partners and the local community to continue to regenerate Sutton Town Centre, including: delivering the Throwley Yard project (a cultural venue); delivering 'Oru Sutton' (a mixed use scheme providing affordable office space, exhibition space, hospitality, wellness suite and intergenerational growing space) in the former BHS building; increasing the wider cultural and education offer; and revitalising the northern end of the High Street;
- developing and delivering a regeneration strategy for the St Nicholas Centre and Civic complex;
- developing and agreeing an improved layout for the Sutton Town Centre gyratory with stakeholders which includes sustainable transport improvements for cycling, walking and buses;
- improving the street scene environment in Sutton Town Centre and continue to improve the 'public realm' in Sutton Town Centre and district centres through greening and sustainable transport improvements;
- continuing to work with our partners to deliver the ground-breaking London Cancer Hub in Belmont and develop sustainable transport solutions to improve accessibility to the London Cancer Hub for all.

Campaign for quality local services

3.67 *“By 2027, the Council will continue to seek the best possible deal for Sutton’s residents, communities and businesses on health, transport, the economy and the environment”* by ensuring Sutton residents can access good quality healthcare, continuing to lobby for improved public transport in the borough and campaigning for the best financial deal for Sutton.

3.68 Selected corporate plan actions which are of relevance to the new Local Plan include:

- lobbying Transport for London (TfL) and the Government for public transport improvements in the borough focusing on extending the Overground from Croydon to Sutton; electrification and expansion of buses servicing the borough; extending the Tram to Sutton town centre; expansion of the local bus network;

- seeking funding to deliver the Belmont Rail Frequency Improvement Scheme to enable a change from the current 2 trains per hour to 4 trains per hour, make public realm improvements to Belmont Station and the immediate surroundings, and improve cycling (funding now secured) and walking access in the area;
- lobbying for improvements to flood management and prevention
- ensuring that Thames Water and the Environment Agency are fulfilling their obligations in relation to flood management and prevention, and lobby them for funding for flood management schemes.

Sutton's Environment Strategy and Climate Emergency Response Plan 2019-25 (LB Sutton, 2020)

3.69 In July 2019, the London Borough of Sutton declared a 'climate emergency'. This committed the council to achieving 'net zero' carbon emissions and publishing a plan for achieving this. Accelerating action on climate change is vital to prevent future adverse impacts on public health, the economy and biodiversity. Sutton's refreshed Environment Strategy and Climate Emergency Response Plan 2019-25 was adopted at the Council's Environment and Neighbourhoods Committee in October 2020 sets the following Vision:

"Sutton will be London's most sustainable borough: Our zero carbon future means cleaner air, and more journeys taken by bike, public transport or on foot. We'll have more green spaces, connected to each other, protecting and enhancing nature and biodiversity. Our energy will be renewable and our homes will be warm in winter, cool in summer, and well insulated. We will reduce waste and create a circular economy, with options to reuse, repair or re-manufacture the things we buy. We will be able to withstand heat waves, droughts and flooding caused by climate change. Everyone will know and play their role in reducing their impact on the environment."

3.70 There are five key elements which build upon the priorities in Sutton's previous Environment Plan adopted in 2019 (and now superseded):

- **Cleaner Air:** By March 2022, 48% of journeys in Sutton will be made by walking, cycling or public transport, rising to 63% by 2041. Meet the air quality standards as soon as possible;
- **A Greener Borough:** No overall reduction in green space in the borough. Maintain and enhance biodiversity. Plant 2,000 trees;
- **Zero Carbon:** All of the borough's energy needs will be met from renewable, community and local sources of energy, helping to deliver borough-wide zero carbon emissions. Tackle fuel poverty;
- **Creating a Circular Economy:** Reduce waste and increase reuse and recycling from 50% year on year. Embed sustainable procurement into the Council's buying and contracts; and
- **Tackling Climate Change:** Retain Sustainable Food City status each year. Raise awareness of the climate emergency and the impacts of climate change on Sutton

3.71 The accompanying Climate Emergency Response Plan highlights the areas of action the council will continue to undertake now; and where additional funding, partnerships or changes by government are needed. It also seeks to encourage, lead and inspire action by local residents to reduce carbon emissions and promote biodiversity. Immediate priorities include tree planting; ensuring that new council homes are built to zero carbon standards; the continued rollout of LED street lighting and incorporating sustainable drainage (SuDS) measures as part of every road improvement scheme. Key Climate Emergency Response Plan Actions relevant to Sutton's new Local Plan include:

Increasing Resilience To Climate Change

- use the 'Climate Just' framework to work with people identified as being vulnerable, as well as with the community and voluntary sector and places such as care homes and hospitals to build knowledge and action when there is a risk of heat waves, excess cold or flooding.
- continue to progress detailed designs and establish the financial feasibility for flood alleviation schemes in the four priority areas: Beddington Gardens, Worcester Park, Wallington Station and South Beddington.
- deliver the 'SuDS in Sutton Schools' project, which will introduce natural drainage features to reduce flood risk in playgrounds as well as the local area. The project will provide educational resources for learning.

- support the delivery of the River Wandle and Beverly Brook Catchment Plans to achieve Water Framework Directive targets
- work with the GLA and Public Health England on emergency planning for heatwaves. Response mechanisms will include 'cool' spaces in public buildings and assets.

Encourage Individual Action on the Climate Emergency

- implement the Council's Parks and Open Spaces Strategy;
- using Local Plan data, work with local people to create green spaces and plant trees where there is a deficit.
- support the creation by the community of pocket parks, community gardens, food growing, and 'meanwhile use';
- deliver the LBS Biodiversity Strategy (incorporated within the Parks and Open Spaces Strategy) ;
- monitor and advise on the creation of new wildlife habitat through the restoration of Beddington Farmlands.

Trees, Parks and Biodiversity

- plant 2,000 trees each year.

Walking, Cycling and Public Transport Use

- publish a new Sustainable Transport Strategy (STS), enabling an increase in walking and cycling in the borough;
- secure funding for cycle network improvements e.g. new quiet routes, segregated cycle paths, cycle parking etc.
- secure funding for transformational changes to create low-traffic neighbourhoods;
- implement a programme of School Streets and Play Streets, working with residents and schools.
- undertake 'Neighbourhood Place Shaping' consultation with residents regarding the 'Safer and Healthier Streets' programme, developing and co-designing potential schemes as appropriate.

Streets and Public Spaces

- include sustainable drainage in every road improvement scheme and assess the feasibility of switching to 100% permeable surfacing materials

Planning

- implement Local Plan Policies 26c (Biodiversity) and 33b (Climate Change Adaptation) in line with the Council's Technical Guidance Note on 'Building a Sustainable Sutton' (June 2018). Compliance of major developments with the relevant green space factor (GSF) and biodiversity accounting targets is reported annually in Sutton's Authority Monitoring Report (AMR).
- maximise opportunities to exceed Local Plan requirements for increasing overall green space coverage and improving the Green Space Factor score by including green space, habitats, landscaping, planting, trees and sustainable drainage retrofit etc: in private developments, through the planning process; as part of major investments e.g. Sutton Town Centre, estate regeneration projects; in estate renewal projects and council housing schemes; transport / Local Implementation Plan schemes; in relevant Business Improvement District projects; in flooding schemes; in other council-led schemes e.g. schools; in the Public Realm Design Guide. Report through the Authority Monitoring Report.
- ensure that all residential developments achieve 'zero carbon' standards (Local Plan Policy 31) or collect carbon offset payments **At the next Local Plan update in 2023, strengthen zero carbon and other environmental policies, if permitted by national government;**
- deliver the Local Plan Policy 25b (open spaces) on allotments and promote allotment plot availability; and
- prepare for mandatory implementation and monitoring of Biodiversity Net Gain in 2023

Sutton Housing Partnership

- develop plans for low-carbon alternatives to individual gas boilers in new and existing homes;

Council Housing and Estate Regeneration

- seek to secure the budgets to enable all new-build council homes and estate regeneration projects led by the Council to be built or retrofitted to a zero carbon standard.

Borough Sustainable Transport Strategy 2020-25

3.72 The Mayor's Transport Strategy 2018 (MTS) and the new London Plan (March 2021) have set renewed London-wide objectives and targets aimed at promoting active and sustainable modes of travel across the capital. A core MTS objective is to work towards 80% of journeys being made by walking, cycling or public transport. Accordingly Sutton's Local Implementation Plan (LIP3) ²⁸adopted in 2019 identified a number of local transport objectives and targets designed to contribute to the MTS at the Borough level. Many of these objectives and targets were subsequently been incorporated in the Council's Climate Emergency Response Plan adopted in October 2020.

3.73 An updated Borough Sustainable Transport Strategy (STS) 2020-25 was introduced in November 2021 in order to secure the delivery of both MTS and local transport objectives and to support the council's wider objectives for addressing climate change, recovering from the pandemic and neighbourhood place-making (see above). The updated STS sets out the following Vision:

“Transport policy and provision within the borough should contribute to a more sustainable future, a better environment, economic prosperity, an improved quality of life and greater equality and safety, especially for children, families, those with mobility issues and those advancing in years”.

3.74 The overarching objectives of the updated STS are:

- ensuring that the borough transport network supports the local economy and meets the current and future needs of the borough in a sustainable way;
- enabling smarter travel choices, including implementing infrastructure which supports the use of walking, cycling and public transport and reduces dependence on the car, particularly for local trips;
- reducing the harmful effects of transport on health, [the] environment and climate change;
- improving the safety and security of road users, particularly pedestrians, cyclists and public transport users; and
- enhancing transport accessibility for all, especially disabled and older residents, and improving the public realm and street design

3.75 .A core theme running through the Borough STS is the principle of 'healthy streets' 'Healthy street' principles were first outlined by the Mayor in 'A City for all Londoners' in 2016. This approach focuses on the experience of people using streets by prioritising active travel, making walking, cycling and public transport use the best choices for travel, encouraging the most efficient methods of essential travel for people and goods, and creating more attractive, accessible and people-friendly streets.

3.76 .Key elements of the council's Vision for transport and associated targets include:

“The borough is committed to encourage residents to take advantage of the existing good opportunities for walking and cycling, while seeking to improve the public transport connections and access to key centres via sustainable means”
(STS Target: Borough residents doing at least 2x10 minutes of active travel a day (or a single block of 20 minutes or more). 36% by 2021 and 70% by 2041);

“To continue to enhance the borough's record as a safe place to travel, particularly by sustainable means, in order to encourage less reliance on the private car. For new developments to contribute to the Healthy Streets principles giving residents, visitors and businesses greater personal security and confidence”

STS Target: Deaths and serious injuries (KSIs) from road collisions 25 in 2021-22, 12 in 2030 and 0 in 2041).

To work with TfL, the Mayor and Government to improve the public transport offer in the borough and provide a realistic alternative to car travel for short and medium journeys, in particular commuting and travel to school

STS Targets:

- reduce overall traffic levels in the Borough by 10-15% compared to 2015 (614 veh-km) . 583 veh-km in 2021 and 553 veh-km in 2041;
- Total cars owned and car ownership per Borough household compared to 2013/14 - 2015/16. 90,400 in 2021 and 86,900 in 2041.

²⁸ Sutton's third LIP is available at <https://moderngov.sutton.gov.uk/documents/s61606/6%20Local%20Implementation%20Plan%20-%20Appendix%20A.pdf>

“To take advantage of increasingly cleaner forms of transport to improve local air quality, while working with TfL and partners to promote increased public transport capacity and Healthy Streets contributions from new developments”

STS Targets:

- CO₂ emissions (in tonnes) from road transport within the borough against 2015-16: 99,000 in 2021 and 26,900 in 2041
- NO_x emissions (in tonnes) from road transport within the borough against 2013: 170 in 2021 and 20 in 2041;
- PM₁₀ and PM_{2.5} emissions (in tonnes) from road transport within borough against 2013: 36 (PM10) and 18 (PM2.5) in 2021; 20 (PM10) and 10 (PM2.5) in 2041

To deliver the Tramlink extension to the borough and strengthen links to new rail and bus corridors, allowing existing and future commuters the opportunity to travel sustainably.

For modern, clean buses with greater route capacity to accommodate the needs of a growing borough, with greater interchange at key centres and the proposed Tramlink extension

Reduce the difference between total public transport network journey time and total step-free public transport network.

For public transport, walking and cycling to be a key attractor for the occupiers of new housing developments in Sutton, by siting the majority of new homes in areas where accessibility is strongest

‘Opportunity Sutton’ (LB Sutton Economic Growth Programme)

3.77 In June 2012 the Council launched the Opportunity Sutton Economic Growth Programme (the OS Programme) - the Council’s plan for economic growth and building Sutton’s reputation as an enterprising and enabling borough:

“Our vision is for Sutton is to be an enterprising, enabling borough that is a magnet for business investment; that welcomes new entrepreneurs and social enterprises; nurtures its business base and removed barriers to enterprise. We want Sutton to have a competitive edge over our neighbours”.

3.78 At its launch, Opportunity Sutton comprised four strategic objectives:

- to create an enterprising Borough;
- to create a distinctive competitive offer
- to create sustainable economic growth;
- to ensure Sutton residents share in growth

Sutton Town Centre Regeneration

3.79 The Sutton Town Centre Masterplan (2016) set out an ambitious plan to promote the regeneration of the town centre by balancing the need to deliver new housing, whilst improving the economic vitality of the town centre and re-invigorating the High Street for Sutton residents, business and communities. Over the long term, the Masterplan seeks to deliver 5,000 new homes, significant improvements to the public realm, an improved cultural offer, an enhanced employment location around Sutton Station, transport improvements and new flagship offices.

3.80 Ongoing regeneration initiatives include Sutton Works, the Market House and the Sound Lounge. Sutton Works is a Council initiative to address the significant loss of office space to permitted development by refurbishing and re-purposing the former BHS department store. The project anticipates delivering over 3,000 m² of new space aimed at start-up and smaller businesses and organisations, with financial support from the GLA and the Strategic Investment Pot grant. The Market House, formerly the RBS, has a focus on Sutton’s cultural offer and will increase footfall and interest in the Market Area of the High Street. The Sound Lounge is the key tenant, staging live music, theatre and community events.

3.81 A Public Realm Design Guide for Sutton Town Centre (SPD1) was adopted by the Council in February 2020. This provides a practical manual for implementing public realm projects and ensure an integrated and consistent approach to any work which is carried out.

3.82 In December 2020, the Council was awarded £11.3 of Government funding to invest in Sutton High Street as part of the Future High Streets Fund²⁹. The money was earmarked to provide over 5,000 m² of new or refurbished commercial space, as well as bringing 14 vacant buildings back into use and providing 235 new homes.

²⁹ the Future High Streets Fund is administered by the Ministry of Housing, Communities and Local Government (MHCLG)

3.83 The importance of the Masterplan's vision for diversifying uses in Sutton Town Centre was further amplified by the impacts of COVID-19. A rapid shift to home working, continued uncertainty over jobs and anxiety about exposure to the virus while travelling on public transport, are driving a trend towards using local rather than large regional/city centres and out of town malls. With the additional investment from the Future High Streets Fund, this provides further impetus to achieving a transformation of the town centre to create new local work spaces, community, hospitality and leisure venues within walking and cycling distance of local residential areas. As of August 2023, the Council is seeking to update and refresh the Sutton Town Centre Masterplan.

London Cancer Hub

3.84 The London Cancer Hub (LCH) seeks to transform a 22.57 ha site in Belmont into the world's leading life science district specialising in cancer research. The LCH is being delivered in partnership with the Institute of Cancer Research, the Royal Marsden NHS Foundation Trust, the Epsom and St Helier University Hospitals NHS Trust and the GLA. Highlights include:

- the new **Harris Academy secondary school** specialising in life sciences opened in September 2019 and will eventually expand to accommodate 1,275 students (approved 31 September 2017, Ref B2016/76164);
- the new **Maggie's Centre** opened in October 2019 in order to provide practical, emotional and social support to people with cancer and their family and friends - working with the Royal Marsden (approved 26 June 2017, Ref B2017/77065);
- the ICR's new £75m **Centre for Cancer Drug Discovery**, which opened on 17 November 2020, has created 7,300 m² of multidisciplinary research space for more than 275 multi-disciplinary scientists (approved 1 April 2016, Ref: B2016/73429); and
- the Royal Marsden's new **Oak Cancer Centre** (under construction), which will open in late 2022 and will bring together 300 researchers (approved 6 November 2019, Ref: DM2019/00998);
- in March 2021, the Council and the ICR announced that renovation work would begin on an existing building adjacent to the Centre for Cancer Drug Discovery, to turn it into a **new Innovation Gateway** (funded through the Mayor's Strategic Investment Pot); and
- a potential application for a new **Specialist Emergency Care Hospital (SECH)** is currently under preparation on behalf of the Epsom and St Helier University Hospitals NHS Trust. The proposed SECH would deliver a range of acute emergency treatment services currently provided by Epsom Hospital and St Helier Hospital.

Place Based Investment Programme (Area Renewal)

3.85 The London Borough of Sutton has embraced a challenging ambition to become the cleanest, greenest borough in South London, and a place where business thrives. The Council's 'place based investment' programme seeks to:

- secure inward investment from the private sector and grant awards to deliver growth and regeneration at a neighbourhood level;
- deliver projects which achieve environmental, social and economic renewal;
- secure the vitality and viability of town and district centres; and
- engage with businesses, government organisations, the third sector and the community to ensure partnership working in shaping and delivery of the programme.

Sutton Northern Gateway Project

3.86 The North Sutton Area currently suffers from a poor quality environment, lack of coherent retail offer and a high level of shop vacancies. A large site immediately to the north of the area, known as the former gas works site, is undergoing significant redevelopment to deliver a large supermarket, other new retail space, residential development and free car parking. Research has demonstrated that similar edge of centre schemes elsewhere have improved footfall into the heart of town centres but only where the design of the public realm and ease of pedestrian movement encourages these links. Consequently, New Homes Bonus (NHB) monies have been awarded to implement a number of interventions in the northern part of the Exchange Quarter (the principal retail area in the town centre) in order to secure connectivity between the major edge of centre retail redevelopment of the former gas works site and the Exchange Quarter.

Rosehill Area Renewal

3.87 The Rosehill Area Renewal initiative seeks to deliver a holistic programme of physical and economic

improvements to the district centre and sets ambitions for all local residents to live healthier lifestyles and be more economically, socially and physically active.

3.88 Four key priorities were identified through public consultation between January to March 2020: (1) Supporting the success of Rosehill district centre (2) Enhancing St Helier Open Space (3) Identifying further opportunities for public realm improvements to make walking and cycling easier; and (4) Providing support to community facilities, including those at Hill House.

3.89 The scheme was allocated capital funding of £561,000 (2020-22) on 2 March 2020 and a programme of improvement projects was subsequently approved at the council's HEB Committee on 13 October 2020

Beddington Programme

3.90 The Beddington Programme consists of a number of 'place-based' investment projects including Beddington North TfL Major Scheme, Beddington SIL Business Improvement District (BID); Beddington Routes and Places; Beddington Village Enhancement and a £3.7m Heritage Lottery Fund project to restore, and enhance Beddington Park (completed in 2020). The £3.56m package of works started in 2017-18 at Beddington Village and further work is currently underway within the Beddington Industrial Area and along the length of Beddington Lane. The programme will significantly enhance the character and appearance of the area.

3.91 Designs for the Beddington North TfL Major Scheme were developed in partnership with TfL and in consultation with the local community and local BID (business improvement district). These designs focus on delivering improvements to Beddington Lane and Hilliers Lane, making it better for pedestrians and cyclists, and providing more travel choice for local businesses and residents.

Sutton Link (formerly Tramlink)

3.92 The extension of Tramlink from Wimbledon to Sutton Town Centre, via Morden has been promoted by both Sutton and Merton Councils for over 20 years as part of a shared aspiration to address the transport deficit in South London and support high quality sub-regional economic growth. The Councils have long been working in collaboration with Transport for London (TfL) to make the case for an extension of the Tramlink network.

3.93 In 2014, TfL completed a feasibility study to test the alignment of the route, the location of potential tram stops, and provide a broad estimate of the cost of construction. The Boroughs identified a funding package that could cover about 20% of the cost and undertook further public consultation to demonstrate overwhelming public support for the Tramlink extension. The Councils have separately identified £500m gross value added (GVA) benefits that will be supported by the tram through by increasing accessibility to and from Sutton for commuters and shoppers; cutting down journey times within the Borough and to/from central London; delivering more customers for local traders; creating a wider pool of potential employees and increased local employment; creating new temporary construction jobs; creating prosperity by attracting new businesses to Sutton; and providing a catalyst for the long-term growth of the local economy.

3.94 The key aims of Sutton Link are to:

- bring the network to Sutton Town Centre via the St Helier Hospital site and then onwards to the Life Sciences Campus at Belmont as a second phase;
- obtain best value from any financial contribution expected from the Council;
- use the Tramlink extension to support economic growth and employment creation within the Borough; and
- maintain Sutton Town Centre's status as one of London's Metropolitan centres.

3.95 The current Sutton Local Plan 2018 safeguards the route .

Sutton Decentralised Energy Network (SDEN)

3.96 The Council is seeking to promote the Sutton Decentralised Energy Network (SDEN) as the primary long-term approach to delivering low or zero carbon energy to new and existing buildings within the Hackbridge area beyond. The SDEN seeks to use 15MW of zero carbon heat available from the permitted Energy Recovery Facility (ERF) plant and 4.5MW of heat available from the existing landfill gas engines operated by Viridor at Beddington Farmlands to supply space heating and hot water to new and existing buildings throughout Hackbridge. The ERF will be capable of treating approximately 275,000 tonnes of non-recyclable waste generated within South London.

3.97 The key aims of the SDEN are to decrease fuel poverty and increase fuel security in the Borough; reduce carbon emissions and environmental footprint by using waste heat as a zero carbon heat source; and deliver infrastructure investment in the Borough and raise Sutton's profile as a sustainability champion.

3.98 Having developed a financial model for the network and following commercial negotiations with stakeholders to promote investment in the SDEN, the Council established a wholly owned company (Opportunity Sutton Ltd) in 2015 to oversee the implementation, operation and maintenance of the network and the SDEN. As of early 2022, SDEN had 467 customers. Upon the completion of the New Mill Quarter (Barratt Homes) within Hackbridge, the network served 725 dwellings; 80 dwellings in the Brio assisted living block; Lidl supermarket; an NHS practice; and 6 business units

3.99 The 2022-2025 SDEN business plan sets out the current position with future expansion plans including the planned connection to the Lavenders development in Hackbridge and subsequently to Sutton Town Centre³⁰. It also describes the further work underway following the award to the Council by the Department of Business, Energy and Industrial Strategy (BEIS) of £310,000 to support commercialisation as part of the BEIS' Green Heat Network Fund transition scheme.

Local Flood Risk Management Strategy and Action Plan

3.100 As a lead local flood authority (LLFA), the Council is required under the Flood and Water Management Act 2010 to develop, maintain, apply and monitor a Local Flood Risk Management Strategy (LFRMS). This must include:

- risk management authorities within the boundaries of Sutton and what management functions each authority has
- the objectives for managing local flood risk, along with how and when they are expected to be achieved. It also needs to detail how each objective will be paid for along with the cost and benefit of each measure
- an assessment of local flood risk;
- a roadmap of how and when the strategy is to be reviewed
- how the wider environment will benefit by achieving the objectives set out in the strategy.

3.101 The current LFRMS and Action Plan, adopted by the Council in June 2022, updates and supersedes the initial LFRMS introduced in 2015. The aim of the Strategy is to work in partnership with local communities and organisations responsible for managing flooding, to better understand and reduce local flood risk in Sutton where economically, technically, socially and environmentally feasible. To achieve this aim a number of key objectives have been identified:

- Strategic Objective A: Improve our knowledge and understanding of the different risks of flooding in Sutton;
- Strategic Objective B: Proactively encourage sustainable solutions for the management of local flood risk which take account of climate change.
- Strategic Objective C: Use planning powers to appropriately mitigate flood risk to or caused by
- Strategic Objective D: Educate, encourage, and empower local residents, businesses and landowners to take action on reducing flood risk.
- Strategic Objective E: Nurture collaborative partnerships with key organisations and Risk Management Authorities, including for funding and resources. developments across Sutton. .

Borough Parks and Open Spaces Strategy

3.102 Sutton's Parks and Open Spaces Strategy 2020-25, incorporating a tree strategy and updated biodiversity strategy (formerly known as the Biodiversity Action Plan) was approved at the Council's Environment and Neighbourhood Committee in December 2019. The strategy sets out the Council's approach to managing, maintaining and enhancing the open spaces in the Borough over the next five years and is intended to increase awareness amongst local residents of how they can become more involved. In particular, it explains the Council's commitment to caring for wildlife and the planet by addressing loss of local habitat and encouraging tree planting to keep Sutton a green and pleasant place to live and work. This forms an important part of Sutton's Climate Emergency Response Plan 2019-25 (see above) since maintaining a network of green space and extending tree cover will play an important role in minimising the future impacts of climate change on the health and well-being of Borough residents.

³⁰ a Decentralised Energy Masterplan for Sutton Town Centre was prepared by AECOM consultants on behalf of the Council in January 2019 with funding from the GLA's Decentralised Energy Enabling Project (DEEP) – see <https://www.london.gov.uk/who-we-are/what-london-assembly-does/questions-mayor/find-an-answer/decentralised-energy-enabling-project-deep-1>

3.103 The Vision underlying the Parks and Open Spaces Strategy 2020-25 is as follows:

“The borough’s parks and open spaces and trees will be well-maintained; support good public health, local culture, social activities and biodiversity and where possible opportunities will be taken to improve access to open spaces, facilities and activities.”

3.104 The Vision is supported by the following objectives:

- (1) Manage parks and open spaces in line with best practice and take opportunities to improve their appearance, enhancing local character through landscaping improvements as funding allows;
- (2) Improve access to open space throughout the borough by removing barriers to access, providing enhanced facilities and where possible creating new open space;
- (3) Support residents to be physically active by promoting the use of parks, offering social prescribing and by providing a range of sports, leisure and social activities, in partnership with sports bodies and clubs;
- (4) Maintain parks policing and enforcement activities to keep parks safe and free of anti-social behaviour;
- (5) Work with friends groups, the voluntary sector, sports bodies and the wider community to develop volunteering and fundraising opportunities;
- (6) Manage park’s assets to generate revenue to support the service and the local economy, including by leasing, events and developing paid for community facilities and licensing businesses to deliver services;
- (7) Enhance the appearance and character of the borough by maintaining a safe, healthy, diverse and resilient tree population and encouraging tree planting; and
- (8) Care for plants, animals and ecosystems and help them to thrive, by promoting an understanding of nature, through the delivery of the Biodiversity Strategy.

3.105 A detailed Action Plan has been developed for the purpose of delivering the above objectives and each of the relevant actions is monitored on a quarterly basis together with other key indicators within the scope of the Council’s Environment Strategy and Climate Emergency Response Plan 2019-25.

Sutton Equality, Diversity & Inclusion Framework 2023-27

3.106 ‘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 2023-27³¹ 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.

³¹ 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>

OTHER LOCAL STRATEGIES

Wandle Catchment Plan

3.107 The Wandle Catchment Plan, prepared in 2014 by the Wandle Trust³² in partnership with the Environment Agency (EA), Wandle Boroughs (including Sutton), the London Wildlife Trust, local anglers, residents and Wandle Valley stakeholders sets out a holistic strategy for restoring south London's River Wandle to its former glory as one of the world's most famous chalk streams.

3.108 The Strategy applies the EA's national Catchment Based Approach for river management planning, and will help the Wandle to reach a state of health known as 'Good Ecological Potential' for the purposes of fulfilling the UK's obligations under the European Water Framework Directive. The following Aims have been identified for improving the health of the Wandle catchment, and its value to local people:

- **Water:** the river's water should be plentiful and clean, and varied in its flow speeds, widths and depths;
- **Habitat and wildlife:** the river should support a mosaic of habitats with high biodiversity;
- **Good access:** local people should be able to access sympathetically managed pathways along the whole river;
- **Engagement:** everyone in the catchment should be aware of the river, and knows how their actions can affect it, with councils, businesses, government agencies and the public working together to improve the river.

3.109 In turn, these Aims have generated a suite of shared Objectives:

- **Water quantity:** water supply in all parts of the river should be sufficient to sustain a healthy population of native flora & fauna and is resilient to risk of drought or flood from extreme weather events or management for human use;
- **Water quality:** quality of water flowing in the River Wandle should meet the standards required for Good Ecological Potential and is stable with no risk of deterioration;
- **Dynamics of flow:** the river should have a re-naturalised varied profile that creates a diversity of flow speeds and water quantity to provide all the key habitat types required by the native flora and fauna associated with lowland chalk streams;
- **Fish and fisheries:** thriving populations of native fish associated with chalk rivers should be present;
- **Macrophytes, trees and the wider river habitat:** communities associated with chalk rivers should be abundant along the river, providing good habitat variety for wildlife and for people;
- **Invertebrates:** the diverse communities associated with chalk rivers should be abundant along the river, playing important roles in ecosystem function and complexity, such as providing a food source for other wildlife; and
- **Phytobenthos:** good populations associated with chalk rivers should be present along the river.

3.110 Under each Objective, a range of Targets and Actions has also been identified for the river's benefit, and to increase the environmental and cultural benefits (also known as ecosystem services) which it provides for local people.

BEST PRACTICE GUIDANCE ON PLANNING FOR SUSTAINABILITY

UK Green Building Council (UKGBC)

- *'Renewable Energy Procurement and Carbon Offsetting Guidance for Net Zero Carbon Buildings'* (UK Green Building Council (UKGBC), April 2019) <https://www.ukgbc.org/ukgbc-work/renewable-energy-procurement-carbon-offsetting-guidance-for-net-zero-carbon-buildings/>
- *'Net Zero Carbon Buildings: A Framework Definition'* (UKGBC, (April 2019) <https://www.ukgbc.org/ukgbc-work/net-zero-carbon-buildings-a-framework-definition/>)
- *'The Commercial New-Build Policy Playbook a Resource for Local Authorities'* (UKGBC, 2021) <https://ukgbc.s3.eu-west-2.amazonaws.com/wp-content/uploads/2021/10/15115522/Commercial-New-Build-Policy-Playbook-October-2021.pdf>
- *'A Guide for Delivering Social Value on Built Environment Projects'* (UKGBC, March 2022) <https://www.ukgbc.org/ukgbc-work/a-guide-for-delivering-social-value-on-built-environment-projects/>

³² the Wandle Trust is now called the South East Rivers' trust (SERT)

- *'Embodied Carbon – Practical Guidance'* (UKGBC, September 2017) <https://www.ukgbc.org/ukgbc-work/embodied-carbon-practical-guidance/>
- *'Renewable Energy Procurement and Carbon Offsetting Guidance for Net Zero Carbon Buildings'* (UKGBC, 2017);
- *'Demystifying Green Infrastructure'* (UKGBC, September 2017) <https://www.ukgbc.org/ukgbc-work/demystifying-green-infrastructure/>
- *'Net Zero Whole Life Carbon Roadmap for the Built Environment'* (UKGBC, 2021) <https://www.ukgbc.org/ukgbc-work/net-zero-whole-life-roadmap-for-the-built-environment/>
- *The New Homes Policy Playbook'* (UKGBC, January 2021) <https://www.ukgbc.org/ukgbc-work/new-homes-policy-playbook/>
- *The Nature Recovery & Climate Resilience Playbook - Driving nature-based solutions'* (UKGBC, November 2022) <https://www.ukgbc.org/ukgbc-work/the-nature-recovery-and-climate-resilience-playbook/>

Town and Country Planning Association (TCPA)

- A Guide for Local Authorities on Planning for Climate Change (TCPA, October 2021) <https://tcpa.org.uk/resources/the-climate-crisis-a-guide-for-local-authorities-on-planning-for-climate-change/>
- Planning For A Healthy Environment – Good Practice Guidance for Green Infrastructure and Biodiversity (TCPA, 2021);
- *'Building a safer future a guide for communities on navigating the planning system in england to tackle flood risk'* (TCPA, December 2021) <https://tcpa.org.uk/wp-content/uploads/2022/03/Building-a-safer-future-a-guide-for-communities-on-the-planning-system-and-flood-risk.pdf>

London Environmental Transformation Initiative (LETI)³³

- LETI Climate Emergency Design Guide (LETI, March 2020) <https://www.leti.uk/cedg>

STUDIES FORMING AS PART OF THE LOCAL PLAN EVIDENCE BASE

Zero Carbon and sustainable built design

- *'Delivering Net Zero Carbon'* study (TNZC) prepared by Etude Consultants on behalf of 19 London Boroughs including LB Sutton (issued to Boroughs in May 2023);
- Low Carbon Development Working Group (London Councils, ongoing);
- Sutton Roadmap to Zero Carbon (consultants, ongoing).
- Energy Masterplanning Study for Sutton Town Centre (AECOM, January 2019).

Flood Risk Management

- Strategic Flood Risk Assessment (SFRA) Level 1 and Level 2 Reports (Metis Ltd) – ongoing;
- Borough Surface Water Management Plan (Metis Ltd, 2021).

Green Infrastructure (GI) and Habitats

- trial mapping of GI within 500m of Urban Areas (automated) using satellite data from European Space Agency (ESA) (Gentian consultants in collaboration with Green Space Information for Greater London CIC or GiGL³⁴);
- trial mapping of habitat coverage and biodiversity value (based on statutory BNG metric) using ISMS (Intelligent Sustainability Management System) created and operated on behalf of the Council by Ai-Dash Ltd for trail areas within the Borough, including Sutton Town Centre and Beddington Park;
- *'Groundtruthing'* ecological studies and BNG baseline analysis undertaken by GiGL with LB Sutton (Oct 2023);
- Greening Sutton Town Centre (LBS was granted £157k for 'Phase 1 of the project in summer 2022); and
- LBS *'Pocket Park'* Programme.

³³ the 'London Energy Transformation Initiative' (LETI) was established in 2017 to support the transition of the London's built environment to meet 'net zero' carbon. Since then, LETI has formed as a Community Interest Company and altered its name to become the 'Low Energy Transformation Initiative' or LETI

³⁴ LB Sutton is supportive of the proposed collaboration with GiGL as part of the existing service level agreement (SLA with GiGL). The Council is currently undertaking a remote mapping trial for all habitats within an area of overlap with the Gentian project

4. THE ENVIRONMENTAL ECONOMIC AND SOCIAL BASELINE (TASK A2)

ESTABLISHING THE POLICY CONTEXT

4.1. The term 'baseline information' refers to the existing environmental, economic and social characteristics of the Plan area, and their likely direction of change without any change to current planning policies. This information must be used as part of the sustainability appraisal (SA) process as the basis for identifying key issues to be addressed by the Local Plan (Section 5: Key Issues) and for developing appraisal objectives and criteria for the purpose of assessing the likely impacts of emerging policy options on the social, economic and environmental objectives of sustainable development (Section 6: SA Framework).

4.2. The updated NPPF (December 2023) confirms that an up-to-date evidence base is essential for producing a sound Local Plan. The environmental, social and economic baseline set out in this chapter is therefore derived from the information included in Sutton's latest Authority Monitoring Report (AMR) and the following Borough studies which have been undertaken in house or commissioned by the Council as part of the Local Plan evidence gathering stage.

General

- Sutton Authority Monitoring Report (AMR) 2021-22
- Sustainability Appraisal (SA) Scoping Report (this document)

Housing

- Five Year Housing Land Supply 2022-23 to 2026-27 (2022)
- Strategic Housing and Economic Land Availability Assessment (SHELAA) 2023
- Local Housing Market & Housing Needs Assessment (Iceni Projects Ltd, 2022)

Town Centres

- Sutton Town Centre Masterplan
- Gyrotray Public Realm Masterplan
- Sutton Town Centre Health Check 2023
- District Centre Health Check 2023
- Local Centre Health Check 2023
- Town Centre & Retail Need Assessment 2023

Employment

- Employment Land and Economic Needs Assessment 2023

London Cancer Hub

- London Cancer Hub (LCH) study 2023
- London Cancer Hub Development Framework 2016

Infrastructure

- Infrastructure Study 2024

Transport

- Borough Transport study 2024

Gypsies and Travellers

- Gypsy & Traveller Need Assessment 2024

Built Design and Townscape

- Borough Characterisation Study 2024
- Taller Buildings Study 2024

Open Space, Green Infrastructure (GI) Biodiversity

- Green Belt and MOL Review 2023
- Green Space Information for Greater London (GiGL) CIC datasets on sites of interest for nature conservation (SINCs) and habitats
- trial mapping of GI within 500m of Urban Areas using satellite data (Gentian/ GiGL CIC);
- BNG baseline mapping (Ai-Dash/ Verne, 2024)
- Greening Sutton Town Centre (LBS granted £157k for Phase 1 - summer 2022)

Flood Risk Management

- Strategic Flood Risk Assessment (SFRA) Level 1 Reports (Metis Ltd) ongoing;
- Surface Water Management Plan (Metis 2021);

Zero carbon and sustainable built design

- Towards Net Zero Carbon (TNZC) study (Etude Consultants Ltd on behalf of 19 Boroughs including LB Sutton 2023);
- Roadmap to Zero Carbon 2023;
- Energy Masterplanning Study for Sutton Town Centre (AECOM, 2019)

4.3. This information has enabled the Council to gain a better understanding of the following questions:

- *How good or bad is the current situation? Do trends show that it is getting better or worse?*
- *How far is the current situation from any established thresholds or targets?*
- *Are particularly sensitive or important elements of the environment affected (e.g. people, resources, habitats)?*
- *How difficult would it be to offset or remedy any damages? Are there expected to be such effects in the future?*

4.4. The baseline information summarised in this chapter will be updated for inclusion in the next SA Report which will accompany the Local Plan Proposed Submission document which will be published for consultation (Regulation 19) in 2025..

INTRODUCTION TO THE BOROUGH

4.5. The London Borough of Sutton (4,485 ha) is a suburban Borough adjacent to the neighbouring south London Boroughs of Croydon, Merton and Kingston. According to the latest mid-year estimates published by the Office for National Statistics (ONS) in December 2022, the resident population of LB Sutton reached a total of 210,053 in mid-2023 (30 June 2022)³⁵.

4.6. Sutton Town Centre, which is designated as an area of growth and regeneration in the current Local Plan 2018, is one of four Metropolitan Centres in South London and identified as an Opportunity Area in the New London Plan 2021. The town centre has 433 retail units within an attractive pedestrianised environment. Sutton Town Centre is complemented by seven district centres, at Cheam, North Cheam, Wallington, Worcester Park, Hackbridge, Rosehill and Carshalton, along with many local centres and dispersed parades.

4.7. Sutton Town Centre (linked with the London Cancer Hub) is identified as an Opportunity Area in the London Plan 2021, under the category of the 'Trams Triangle'. This highlights the proposal to extend the Tram to Sutton Town Centre, and potentially beyond to the LCH, which would improve public transport accessibility to the town centre and St. Helier Hospital, and support the delivery of new homes and new jobs. The London Plan 2021 suggests this could unlock the delivery of 5,000 homes and 3,500 jobs in Sutton Town Centre. However, despite extensive work by the Council over many years, in 2020 the tramlink extension to Sutton was officially 'paused' due to a funding gap. In September 2023, the Mayor's Transport Committee confirmed that they were no longer able to commit funding to the project. Since the Sutton Opportunity Area was predicated on the delivery of tramlink, the status of this designation is now unachievable if the extension is not delivered or alternative major transport interventions are delivered to Sutton Town Centre and beyond.

4.8. Industrial activity is concentrated in the Borough's established industrial areas, three of which are identified as strategic industrial locations (SILs). These are Kimpton, Beddington and a small part of the Purley Way SIL. Each of these is served by key radial routes into London from the M25. Elsewhere, a number of the smaller established industrial areas, particularly within the Wandle Valley, have been transformed over recent years into housing or mixed use developments, for example the Felnex Trading Estate (now the New Mill Quarter in Hackbridge) and Wandle Valley Trading Estate in Hackbridge.

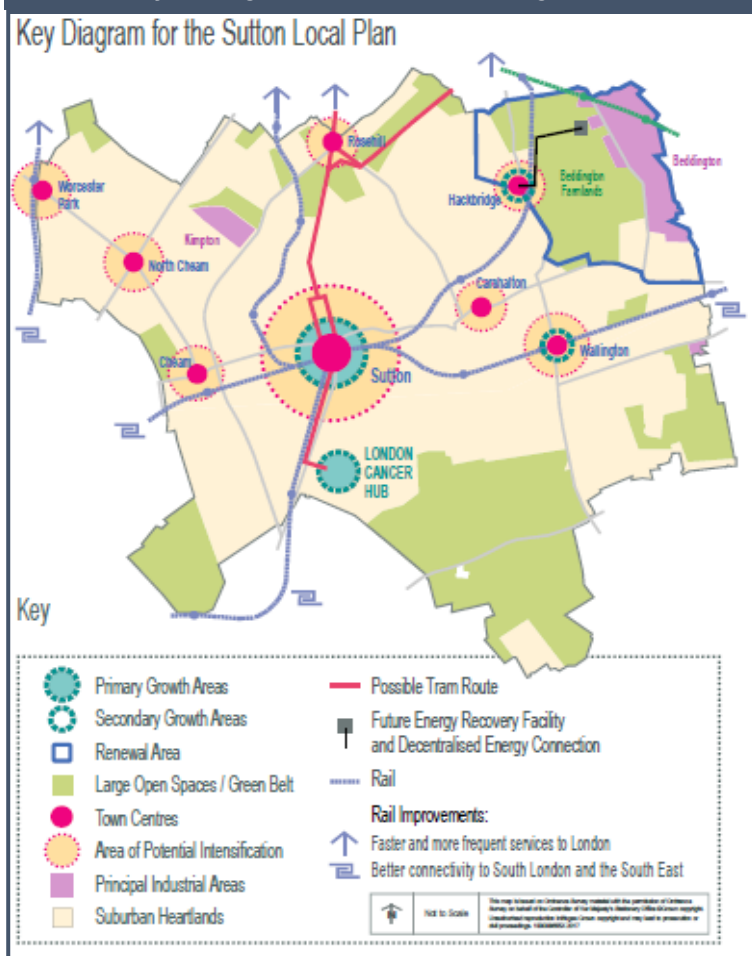
4.9. LB Sutton has number of high quality heritage areas designated as Conservation Areas and Areas of Special Local Character (ASLCs). There are extensive areas of low-density housing, mainly in the south of the Borough, which were mostly built in the 1920s and 1930s, characterised by large, detached houses with well landscaped gardens. In contrast, there are pockets of relative social deprivation, characterised by limited access to employment, social infrastructure and transport services, including areas to the north of the Borough, such as Rosehill, St Helier and the Wrythe, and parts of South Beddington.

4.10. Towards the south, the proposed London Cancer Hub (LCH) is being promoted by the Council in partnership with the Institute for Cancer Research (ICR), the Royal Marsden NHS Foundation Trust and Epsom & St Helier University Hospitals NHS Trust (Sutton Hospital) and seeks to build upon the world leading patient care, research and cancer treatment produced by these organisations.

4.11. Sutton is a Green Belt Borough. The existing stock of Green Belt is 605.9 ha, consisting of the Little Woodcote area (499.2 ha) to the southeast and the Cuddington area' (106.7 ha) to the south west. A further 529.1 ha of the Borough's open space is designated as Metropolitan Open Land (MOL) on the basis of its strategic significance for openness, leisure, recreation, sport, landscape, nature conservation or heritage. These range in size from 2.17ha (Land North of Goat Road) to 199.1 ha (Beddington Farmlands). There is a total of 518.0 ha of public open space on 244 sites within the Borough consisting of 2 Metropolitan Parks (125.99 ha), 3 District Parks (80.32 ha); 36 local parks (217.84 ha); and 203 small areas of public open space (93.86 ha).

³⁵ ONS Mid-Year Estimates 2022 (published Nov 2023) are available at <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates>

Map 4.1: Key Strategic Features of the Borough



4.12. The Borough contains several important habitats, including chalk grassland sites such as Roundshaw Downs. Many of these sites require on-going management to maintain and enhance their biodiversity value. The Wandle supports many excellent plant communities with several rare species. There are 54 Sites of Importance for Nature Conservation (SINCs) in the Borough, including: 9 sites of ‘Metropolitan Importance’ occupying 314 ha, or 7.2% of the total area of the Borough, comprising the Upper River Wandle; Beddington Farmlands; Mitcham Common; Roundshaw Downs and Woodcote Park Golf Course, 29 sites of ‘Borough Importance’ occupying 313 ha; and 14 sites of ‘local importance’ occupying around 41 ha.

4.13. LB Sutton has the highest percentage cover of backgarden land³⁶ of all London Boroughs at 33%. The average size of its gardens at 148m² puts Sutton at 4th place (out of 33 boroughs). The total coverage of backgarden land is greater than all of Sutton’s Sites of Importance for Nature Conservation (SINCs) put together.

4.14. The Wandle Valley Regional Park, which is being delivered by the Wandle Valley Regional Park Trust, will include all adjoining open spaces and footpath/cycleway links along the length of the river between the Thames at Wandsworth and the sources of the river in Sutton and Croydon. The Regional Park also support the objectives of the All London Green Grid which lies at the heart of the Mayor’s programme to deliver high quality public spaces across London by “creating a network of interlinked, multi-purpose open spaces with good connections to the places where people live and work, public transport, the Green Belt and the Thames, to provide a richly varied landscape that will include diverse uses to appeal to all”.

4.15. A key element of the Regional Park within the Borough will be the restoration of Beddington Farmlands (92 ha), due to be completed by the end of 2023 under the terms of the original planning permission for the landfill site. This will create an additional 44.4 ha of open space within the Borough in line with the objectives of the current Local Plan 2018, Sutton’s Biodiversity Action Plan (Open Space Strategy), the Wandle Regional Park and the London Green Grid.

³⁶ further details of backgarden land within LB Sutton and its value for habitats and green infrastructure is available via the GiGL website at <https://www.gigl.org.uk/2022/07/21/suttons-garden-resource/>

4.16. A variety of new habitats will be created, including areas of wet grassland and acid grassland / lowland heath, as well as the management and enhancement of existing habitats including lakes and islands, reedbeds, meadowlands, and ‘displacement habitats’. The overarching objectives for the restoration of the site are set out in the Conservation Management Scheme (CMS). When fully restored and made accessible to the public, Beddington Farmlands will provide enhanced opportunities for residents to enjoy outdoor space and engage with wildlife and significantly add to the provision of open space and green infrastructure (GI) within the Borough.

4.17. The Borough’s road network (380 km) includes 3 strategic ‘Red Routes’ (17.5 km) managed by TfL (A24, A217 and A232). The remainder of the road network is managed by the Council, and consists of 12 km of other ‘A’ roads, 25 km of ‘B’ roads, 17 km of ‘C’ roads and 308 km of local access roads. The Borough is served by a number of suburban rail services and there 2 Tramlink stops in the north east corner of the Borough

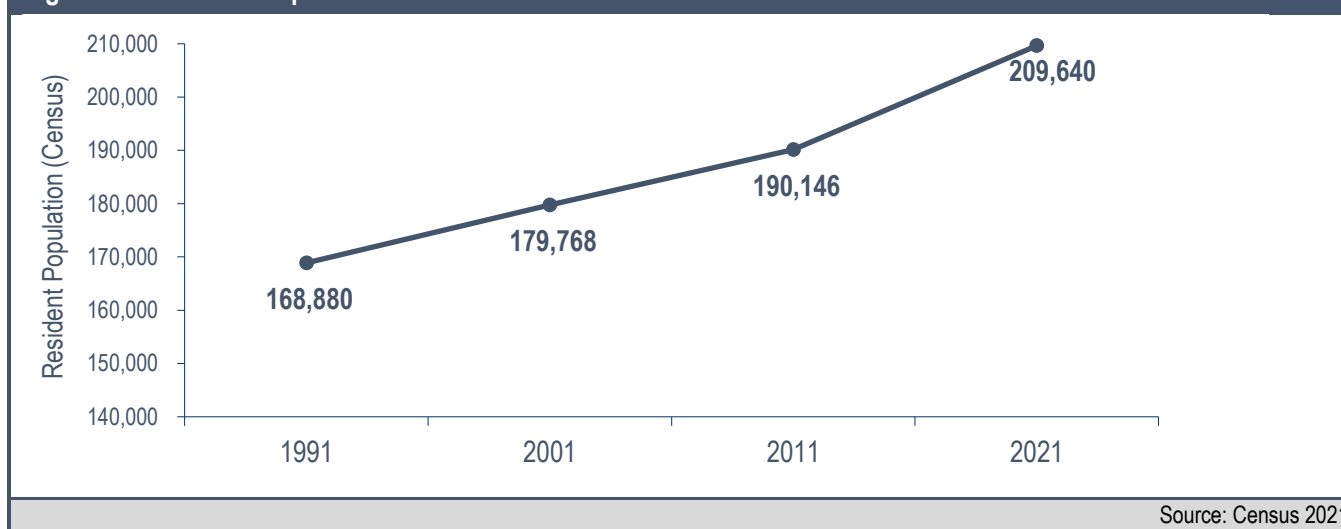
SUTTON’S POPULATION

Borough Population – Census 2021

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

Source: Census 2021³⁷

Figure 4.1: Resident Population in LB Sutton 1991 to 2021 – Census 2021



Borough Population – ONS Mid-Year Estimates

Indicator	ONS Mid-Year Estimate 30 June 20118 (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)
Resident population	204,525	206,349	207,707	209,517
<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%)	+1,358 (+0.7%)	+ 1,810 (0.9%)

Source: ONS Mid-Year Estimates 2021 (December 2022)³⁸

³⁷ Census 2021 <https://census.gov.uk/>

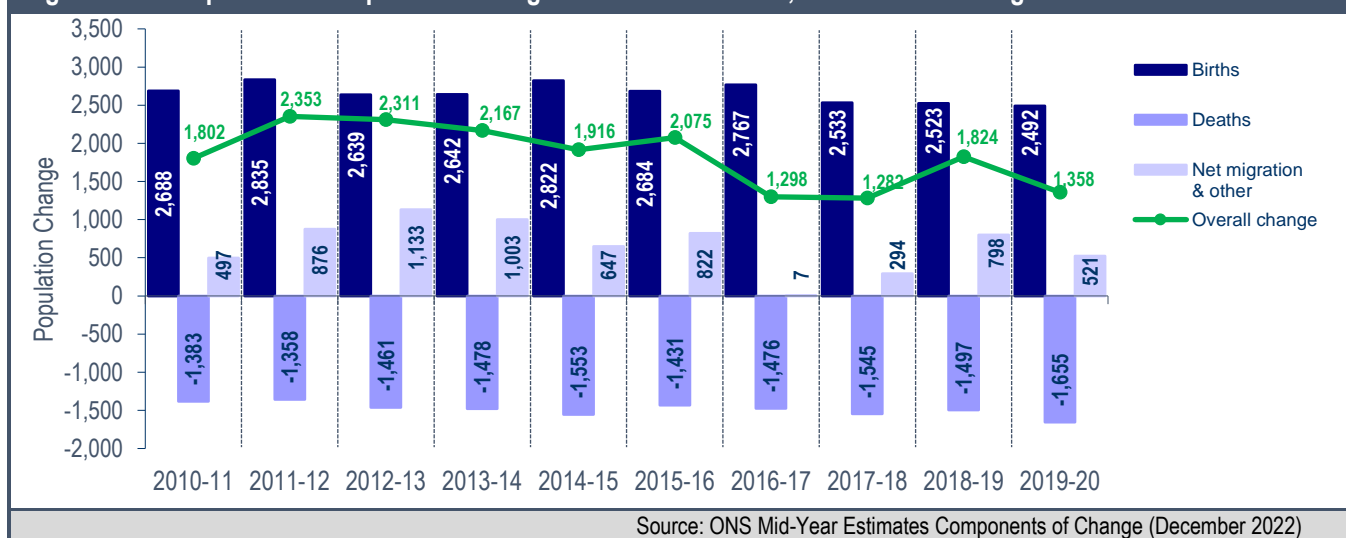
³⁸ ONS Mid-Year Estimates for 2021 published December 2022

Components of Population Change³⁹

Indicator	Change in Population 1 July 2018 to 30 June 2019	Change in Population 1 July 2019 to 30 June 2020	Census 2021 (new baseline)	Change in Population from Census 2021 (21 March to 30 June
Births	+ 2,523	+ 2,492	209,640	+ 673
Deaths	- 1,497	-1,655		- 382
Net migration	+ 798	+ 521		- 384
Net change in population	+ 1,824	+ 1,358		-93

Source: ONS Mid-Year Estimates (31 December 2022)

Figure 4.2: Components of Population Change in LB Sutton: Births, Deaths and Net Migration 2011-12 to 2020-21



Borough Population Projections

Indicator	LOCAL PLAN PERIOD			NEXT 10 YEARS			Source	Release
	2016	2031	Change 2016-31	2022	2032	Change 2021-31		
Projected Borough population (GLA Housing Led) ⁴⁰	203,092	216,311	+13,219 (+6.5%)	211,872	216,735	+4,863 (+2.3%)	GLA Interim Housing-Led projections: 10-yr migration trend (2021-based)	Jan 2023
Projected Borough population (GLA Trend) ⁴¹	203,092	222,888	+19,796 (+9.7%)	211,573	223,913	+12,340 (+5.8%)	GLA Interim Trend projections: 10-yr migration trend (2021- based)	Jan 2023
Projected Borough population (ONS) 2018-based	201,945	214,403	+12,458 (+6.2%)	209,071	214,804	+5,733 (+2.7%)	ONS Sub-National Projections (2018-based) ⁴²	March 2020

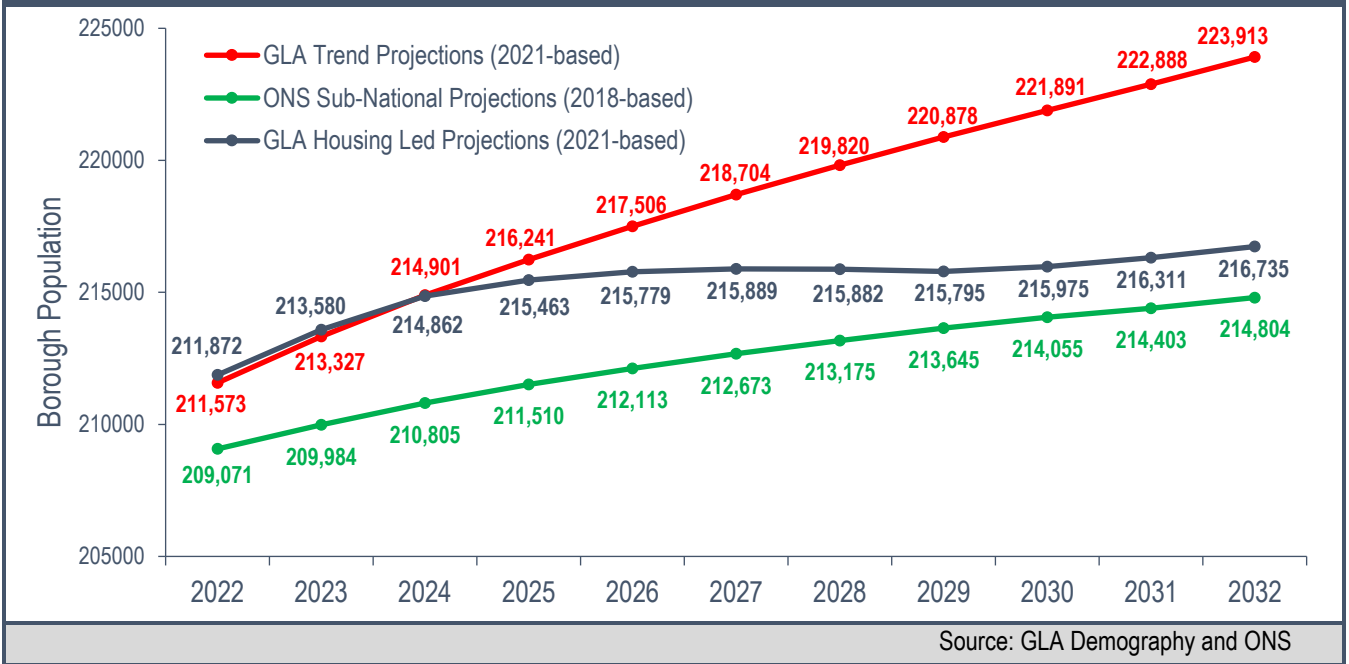
³⁹ the reported 'components of population change' feeding into the Mid-Year Estimates for 30 June 2021 are reported differently than for previous years. This is because the Borough population as recorded in the Census 2021 is assumed to be accurate and estimated figures for births, deaths and net migration apply to the three month period between the date of the Census (21 March 2021) and the mid-year point of 2021 (30 June 2021)

⁴⁰ GLA Interim 2021-based housing-led projections (capacity) released January 2023 are available at <https://data.london.gov.uk/dataset/housing-led-population-projections>

⁴¹ GLA 2021-based trend population projections released January 2023 are available at <https://data.london.gov.uk/dataset/trend-based-population-projections>

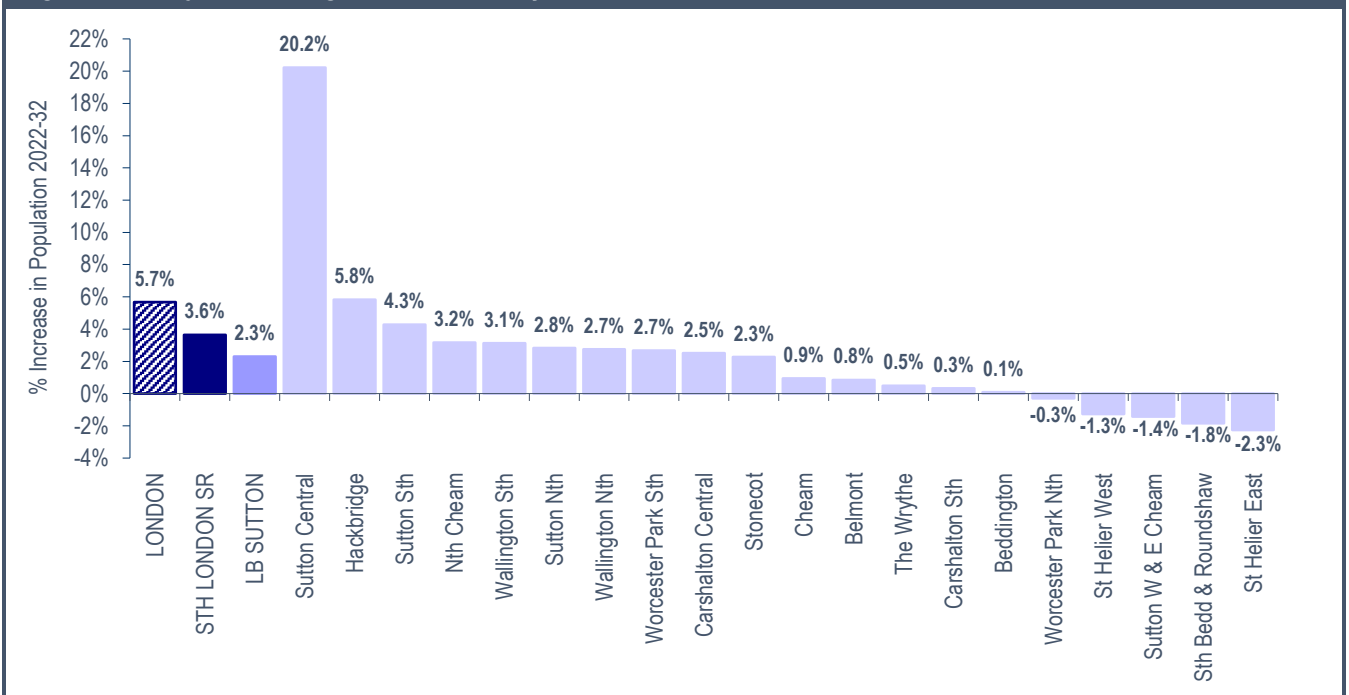
⁴² ONS 2018-based sub-national population projections are available at <https://www.ons.gov.uk/releases/subnationalpopulationprojectionsforengland2018based>

Figure 4.3: Population Projections for LB Sutton 2022-32 (GLA and ONS)



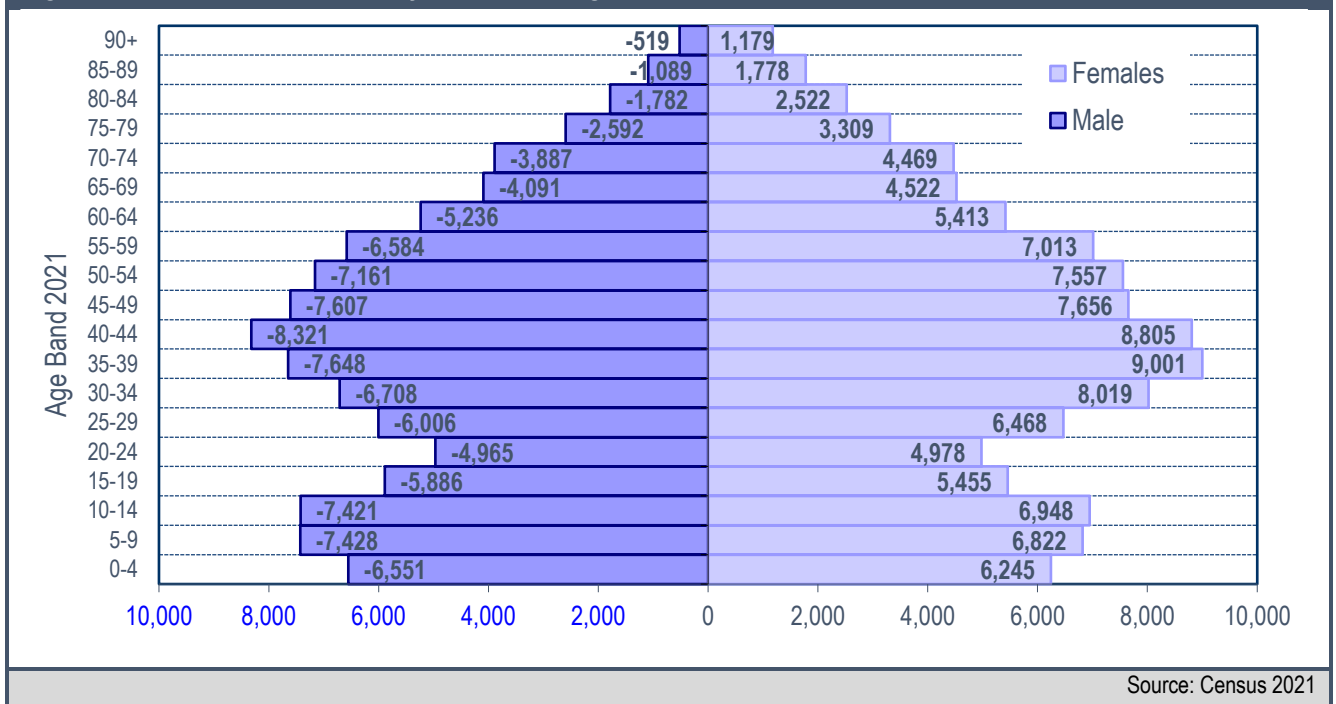
Ward Population Projections

Figure 4.4: Projected Change in Population by Ward 2022-32



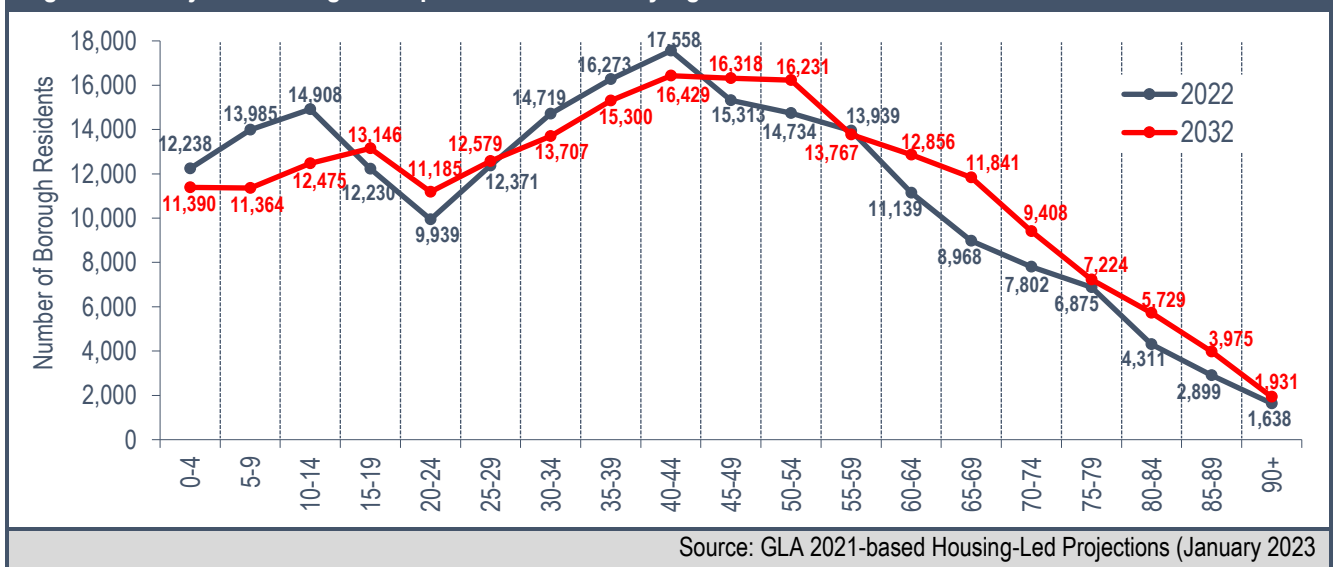
Population Structure – Census 2021

Figure 4.5: Population Structure by Gender and Age Band - Census 2021



Projected Change in Population Structure 2022-32 (GLA Housing-Led)

Figure 4.6: Projected Change in Population Structure by Age Band for LB Sutton 2022-32



Population density (residents per hectare)

Indicator	Census 2011	Census 2021	Percentage change
Population density in LB Sutton (res. per square km)	4,337	4,780	10.2%

Ethnicity

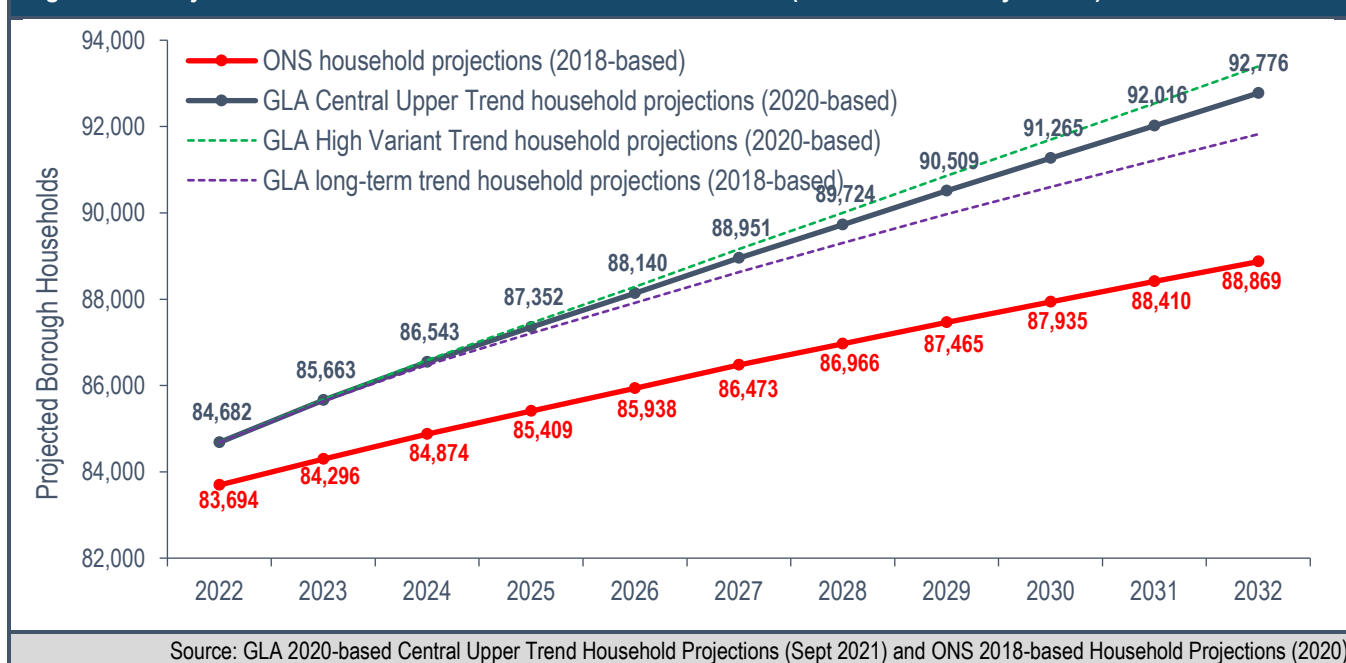
Indicator	Census 2011		Census 2021	
	Number	%	Number	Proportion (%)
Borough Residents: White	157,593	82.9%	143,145	68.3%
Black and Minority Ethnic (BAME)	32,507	17.1%	66,491	31.7%
Asian or Mixed Race (incl. Chinese)	17,299	9.1%	39,855	19.0%
Black or Mixed Race	10,646	5.6%	16,510	7.9%
Other	5,893	3.1%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

Projected Growth in Borough Households

	PREVIOUS 10 YEARS			NEXT 10 YEARS			LOCAL PLAN PERIOD		
	Census 2011	Census 2021	Change 2011-21	2022	2032	Change 2021-31	2016	2031	Change 2016-31
CENSUS DATA	76,174	82,347	+4,173 (+5.3%)	-	-	-	-	-	-
ONS Household Projections (2018-based)	-	-	-	83,694	88,869	+5,175 (+6.2%)	80,986	88,410	+7,424 (+9.2%)
GLA Central Upper Trend H projs (2020-based)	-	-	-	84,682	92,776	+8,094 (+9.6%)	81,865	92,016	+10,151 (+12.4%)
GLA High Variant Trend HH projs (2020-based)	-	-	-	84,682	93,393	+8,711 (+10.3%)	81,865	92,537	+10,672 (+13.0%)
GLA Low Variant Trend HH projs (2020-based)	-	-	-	84,682	91,823	+7,141 (+8.4%)	81,865	91,213	9,348 (+11.4%)

Source: Census 2021, ONS Household Projections⁴³ and GLA Household Projections⁴⁴ (London Datastore)

Figure 4.7: Projected Household Growth in LB Sutton 2022 to 2302 (GLA and ONS Projections)



Notes on GLA and ONS Household Projections

ONS HOUSEHOLD PROJECTIONS

ONS household projections are based on a set of assumptions about the size and structure of the population and patterns of household formation. These are 2018-based sub-national projections; revised population estimates and Census data.

GLA CENTRAL UPPER TREND HOUSEHOLD PROJECTIONS

The 'central' trend projection informs the London Plan and is considered by the GLA to be the most appropriate for medium to long-term strategic planning. This uses past trends in births, deaths and migration to project future populations using 10-yr average domestic migration rates and international migration in-flow and out-flow rates (ONS household model).

GLA HIGH VARIANT TREND HOUSEHOLD PROJECTIONS

The GLA's 'high variant' trend projection uses past trends in births, deaths and inward migration, future fertility and mortality projections (common to all variants) together with the 'high' domestic and the 'central' international migration scenarios.

GLA LOW VARIANT TREND HOUSEHOLD PROJECTIONS

The GLA's 'low variant' trend projection uses past trends in births, deaths and inward migration based on future fertility and mortality projections (common to all GLA variants) together with the 'central' domestic migration and the 'low' international migration scenario.

⁴³ ONS household projections at <https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/datasets/householdprojectionsforengland>

⁴⁴ GLA projections are available on the London Datastore at https://data.london.gov.uk/demography/population-and-household-projections/?preview=true&_thumbnail_id=14728

Projected Change in Household Composition 2022-33

Household Type	2022	2031*	Projected Change
Number of Borough Households	84,682	92,016	+7,334 (+8.7%)
With Dependent Children	31,779	32,310	+531 (+1.7%)
One Person	15,052	16,896	+1,844 (+12.3%)
With two or more adults (no dependent children)	37,851	42,811	+4,960 (+13.1%)

Source: GLA 2020-based Central Upper Trend Household Projections (Sept 2021) *no data available for 2032 onwards

Projected Change in Household Size 2022-32

Indicator	2022	2032	Projected Change
Average household size in LB Sutton (persons_	2.45	2.36	- 0.09

Source: GLA 2020-based Central Upper Trend Household Projections (September 2021)

Dwellings by Tenure

Indicator	2015	2016	2017	2018	2019	2020	2021	Change 2015-2021
Total dwellings	81,240	81,630	82,280	82,980	83,553	84,126	84,439	+3,199
Social rented	11,090 (13.7%)	11,810 (14.5%)	11,870 (14.4%)	11,790 (14.2%)	11,883 (14.2%)	12,030 (14.3%)	12,004 (14.2%)	+914
Local Authority	6,010	5,980	5,980	5,880	5,926	6,007	6,025	+15
Private Reg Provider ⁴⁵	5,080	5,830	5,890	5,910	5,957	6,023	5,979	+899
Other public sector	30 (0.04%)	30 (0.04%)	30 (0.04%)	30 (0.04%)	31 (0.04%)	31 (0.04%)	31 (0.04%)	+1
Private sector	70,120 (86.3%)	69,790 (85.5%)	70,380 (85.5%)	71,160 (85.8%)	71,639 (85.7%)	72,065 (85.7%)	72,404 (85.8%)	+ 2,284

Source: Department for Housing, Communities & Local Government - Number of Dwellings by Tenure Table 100 (Dec 2022)⁴⁶

Housing Tenure by Household

Indicator	CENSUS 2011	ONS Annual Population Survey (indicative)						CENSUS 2021	Change 2011-2021
		2015	2016	2017	2018	2019	2020		
Households: Total	78,174	77,900	77,600	79,900	78,000	79,200	84,300	82,347	+4,173 (+5.3%)
Own Outright	22,357 (28.6%)	23,300 (29.9%)	23,700 (30.5%)	29,000 (36.3%)	25,600 (32.8%)	26,900 (34.0%)	31,000 (36.8%)	23,400 (28.4%)	+1,043 (+4.7%)
Mortgage	30,795 (39.4%)	33,100 (42.5%)	30,300 (39.1%)	30,500 (38.2%)	28,400 (36.4%)	28,300 (35.7%)	29,800 (35.3%)	30,536 (37.1%)	- 259 (-0.8%)
Rented from Council or Registered Provider	11,422 (14.6%)	9,200 (11.8%)	8,800 (11.4%)	8,900 (11.2%)	8,000 (10.3%)	10,500 (13.3%)	8,200 (9.8%)	11,667 (14.2%)	+245 (+2.1%)
Rented from private landlord ⁴⁷	13,600 (17.4%)	12,300 (15.8%)	14,800 (19.0%)	11,400 (14.3%)	16,000 (20.5%)	13,500 (17.0%)	15,300 (18.1%)	16,744 (20.3%)	+3,144 (23.1%)

Source: Census 2021⁴⁸ and ONS Annual Population Survey⁴⁹

⁴⁵ Private Registered Provider here refers to registered providers of social housing (previously known as Housing Associations or Registered Social Landlords)

⁴⁶ see <https://www.gov.uk/government/statistical-data-sets/live-tables-on-dwelling-stock-including-vacants>

⁴⁷ the number of households recorded as 'rented from private landlord in the Census 2011 includes those in shared ownership (i.e. part owned and part rented)

⁴⁸ Census 2021 data on households by tenure at <https://www.ons.gov.uk/peoplepopulationandcommunity/housing/bulletins/housingenglandandwales/census2021>

⁴⁹ ONS data on households by tenure is available London Datastore at <https://data.london.gov.uk/dataset/housing-tenure-borough> (unlike the Census, indicative only).

Local Housing Need (2024)

A. Setting the Baseline	
Step 1: Household Growth (p.a.) over next 10 years, 2024-34	1,234
Affordability Adjustment:	
Median workplace-based affordability ratio, 2023	13.18
Adjustment Factor	157%
Step 2: Uncapped Housing Need Figure	1,942
C. Cap	
Date of London Plan adoption	March 2021
Plan more than 5 years old	No
Housing requirement in the London Plan	469
Higher Cap @ 40% above the household growth figure	657
Step 3: Capped Housing Need	657
D. Urban Uplift	
Top 20 Largest Area	Yes
35% Urban Uplift	229
Step 4: Minimum Local Housing Need (p.a.)	886
E. Conclusion	
Sutton Local Housing Need Figure	886
Source: Local Housing Market and Housing Needs Assessment ⁵⁰	

Commentary: The initial calculation shows that LB Sutton's housing need figure is 1,942, but as the London Plan 2021 was adopted less than 5 years ago the Council can apply a cap, which limits the need figure to 657 homes per year. However, as Sutton forms part of London, the Council has to apply the 35% 'urban uplift', which increases the final housing need figure of 886 homes per year. Sutton has a strong track record of delivering against its housing target, a local housing need figure of 886 is higher than the average housing completions rate for Sutton over the last 15 years and higher than any single year of delivery.

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							

Housing need by tenure

Projected Size of Tenure	1 Bedroom	2 Bedrooms	3 Bedrooms	4+ bedrooms
Market	10-15%	30-35%	35-40%	15-20%
Affordable Home Ownership	30-35%	40-45%	15-20%	5-10%
Affordable Housing (Rented	30-35%	30-35%	25-30%	5-10%
Source: Strategic Housing Market and Local Housing Needs Assessment, 2022				

⁵⁰ ONS data on households by tenure is available London Datastore at <https://data.london.gov.uk/dataset/housing-tenure-borough> (unlike the Census, indicative only).

Commentary: Property prices in LB Sutton are generally high. The cost of land and construction can make it difficult to develop affordable housing without significant subsidies or incentives. LB Sutton also has limited available land for new housing, with heritage, environmental, and other policy designations reducing the supply of available sites.. Affordable housing need is shown in the Table below. There is a need for **1,396** rented affordable homes and **262** affordable home ownership homes per annum. Taken together, the total annual affordable housing need is **1,658**.

Housing Capacity

Future housing capacity in LB Sutton (2029 onwards)	Large Sites (2029 onwards)	Small Sites (2029 onwards)
403 per annum	135 per annum	268 per annum
Source: London Plan Strategic Housing Land Availability Assessment (SHLAA) (2017) (covers the period to 2041) ⁵¹		

Car Ownership

	2020	2021	2022
LB SUTTON			
Number of cars	87,063	86,313	86,162
Number of households (GLA Central Upper Trend 2020-based)	83,753	83,521	84,682
Cars per household (6 th highest in London)	1.04	1.03	1.02 ↓
SOUTH LONDON SUB-REGION			
Cars per household	0.89	0.89	0.87 ↓
LONDON			
Cars per household	0.74	0.74	0.72 ↓
Source: DVLA/DFT: Licensed vehicles (Q1 2022) and GLA Household Projections Central Upper Trend (2020-based) (Sept 2021)			

Index of Multiple Deprivation (IMD 2019)⁵²

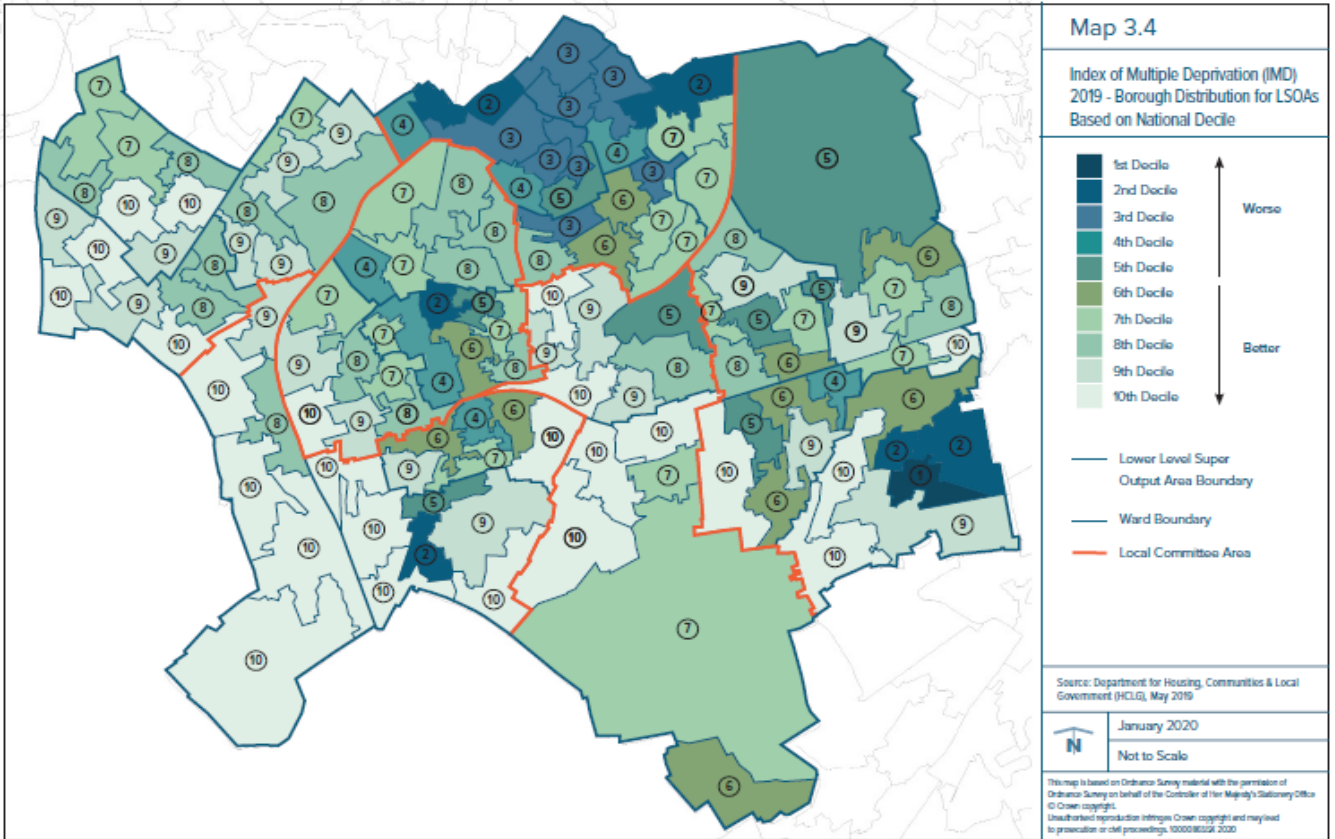
Deprivation Indicator	IMD 2010	IMD 2015	IMD 2019
BOROUGH RANKING COMPARED TO OTHER LAs IN ENGLAND AND LONDON			
LB Sutton ranking compared to the 317 local authority areas in England based on IMD 2019 'rank of average score' (1 st = most deprived and 317 th = least deprived)	196th most deprived in England	215th most deprived in England	226th ↓ most deprived in England
LB Sutton ranking compared to the 33 London Boroughs	5th least deprived	5th least deprived	3rd ↓ least deprived in London
RANK OF LOWER LAYER SUPER OUTPUT AREAS (LSOAs) IN LBS COMPARED TO ALL OTHER LSOAs IN ENGLAND			
Lower layer super output areas (LSOAs) in LB Sutton ranked in the 20% most deprived LSOAs in England ⁵³	6 out of 121	7 out of 121	7 out of 121 Beddington South (3); Belmont (1); Wandle Valley (1); St Helier (1); Sutton Central (1)
LSOAs ranked within the 10% most deprived LSOAs in England	0 out of 121	1 out of 121	1 out of 121 Beddington South (1)
LSOAs ranked within the 20% least deprived LSOAs in England	27 out of 121	39 out of 121	42 out of 121 ↑
LSOAs ranked within the 10% least deprived LSOAs in England	10 out of 121	17 out of 121	23 out of 121 ↑
CHANGE IN RANKING FOR LSOAs IN LB SUTTON SINCE IMD 2015			
LSOAs becoming less deprived in their relative ranking compared to all LSOAs in England (up at least one decile)	n/a		39 out of 121 - up one decile: 38 - up two deciles: 1
LSOAs maintaining their relative ranking since 2015 (deciles)	n/a		73 out of 121
LSOAs becoming more deprived in their relative ranking compared to all LSOAs in England (down at least one decile)	n/a		10 out of 121 - down two deciles: 1 - down one decile: 9
Source: Index of Multiple Deprivation (IMD), Department for Housing, Communities and Local Government (HCLG) May 2019			

⁵¹ the SHLAA is available at <https://www.london.gov.uk/programmes-strategies/planning/london-plan/new-london-plan/strategic-housing-land-availability-assessment>

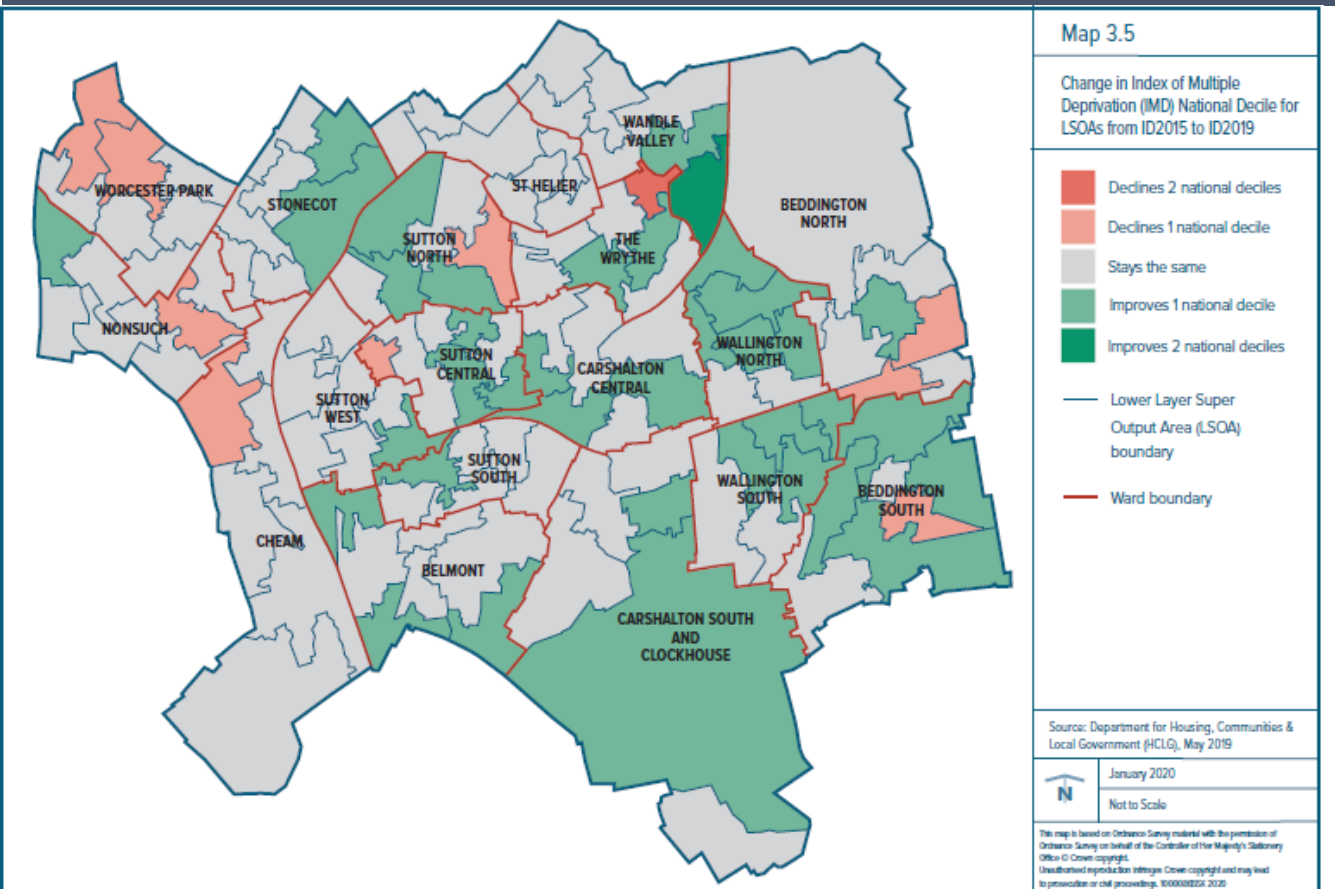
⁵² the Index of Multiple Deprivation (IMD), prepared by the Department for Housing, Communities and Local Government (HCLG), is the Government's official measure of relative deprivation for small areas and neighbourhoods in England

⁵³ there are 32,844 lower layer super output areas (LSOAs) in England

Map 4.2: Index of Multiple Deprivation – Borough Distribution based on IMD 2019 Ranked Scores for LSOAs

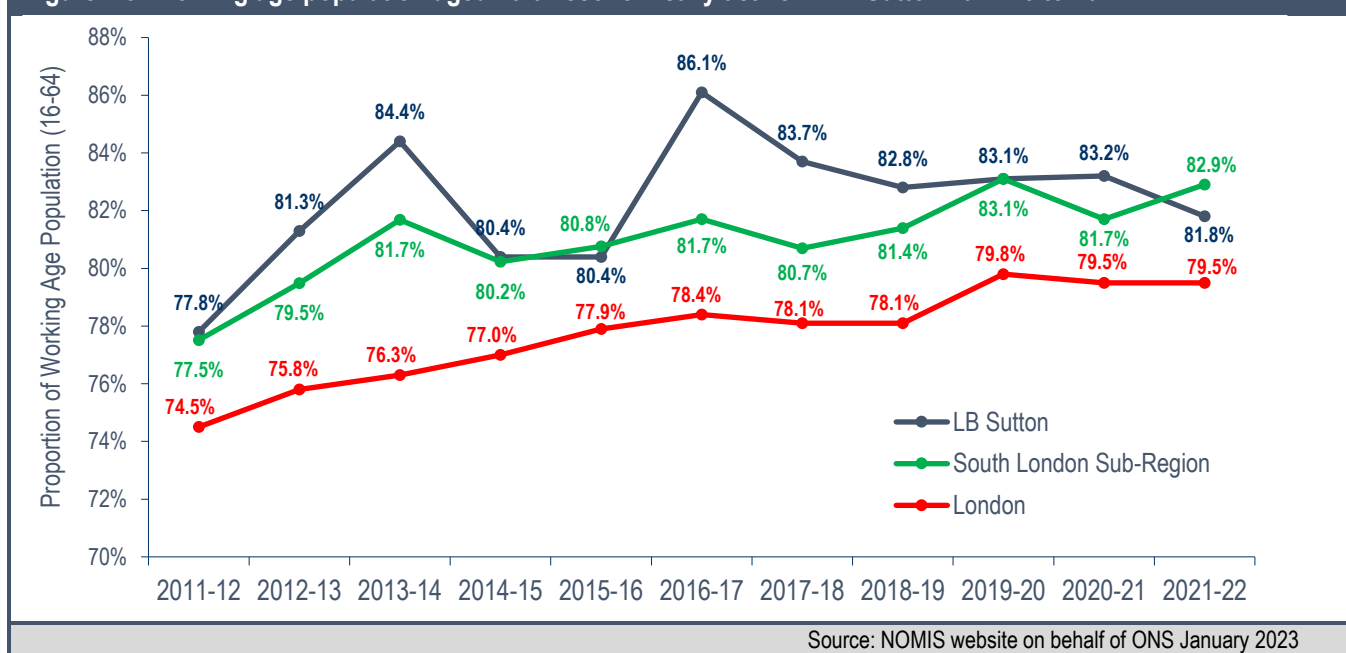


Map 4.3 Index of Multiple Deprivation – Change in IMD national decile for LSOAs between 2015 and 2019



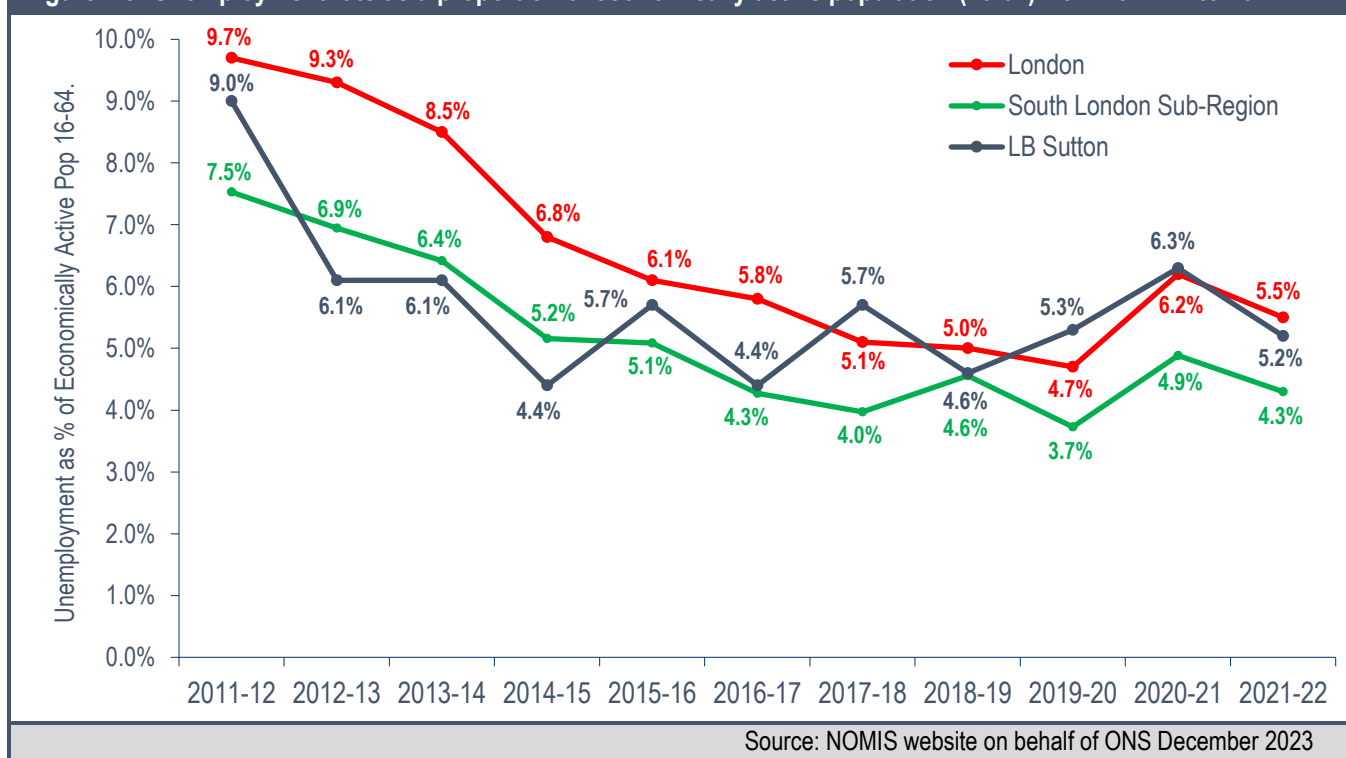
Economic Activity – Borough Residents

Figure 4.8: Working age population aged 16-64 economically active in LB Sutton 2012-13 to 2021-22



Unemployment Rate and Out-of-Work Benefit Claimants

Figure 4.9: Unemployment rate as a proportion of economically active population (16-64) from 2011-12 to 2021-22

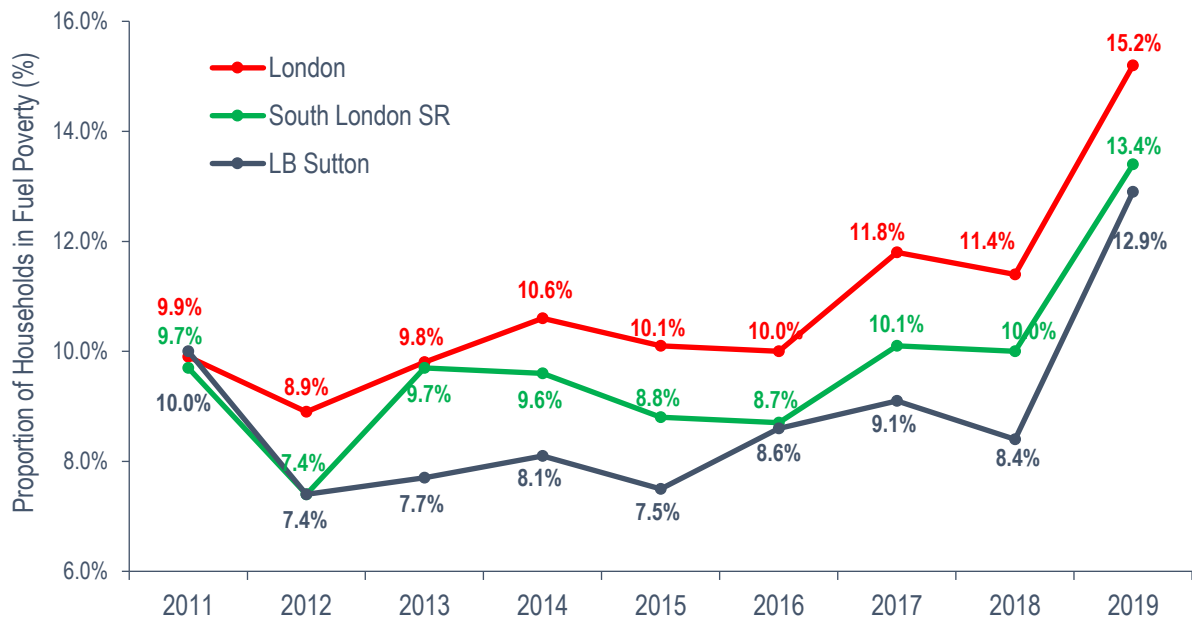


Fuel poverty - Government data to 2019

Indicator	2018	2019	Change
Percentage of Fuel Poor Households in LB Sutton	8.4%	12.9%	+4.5% pts ↓

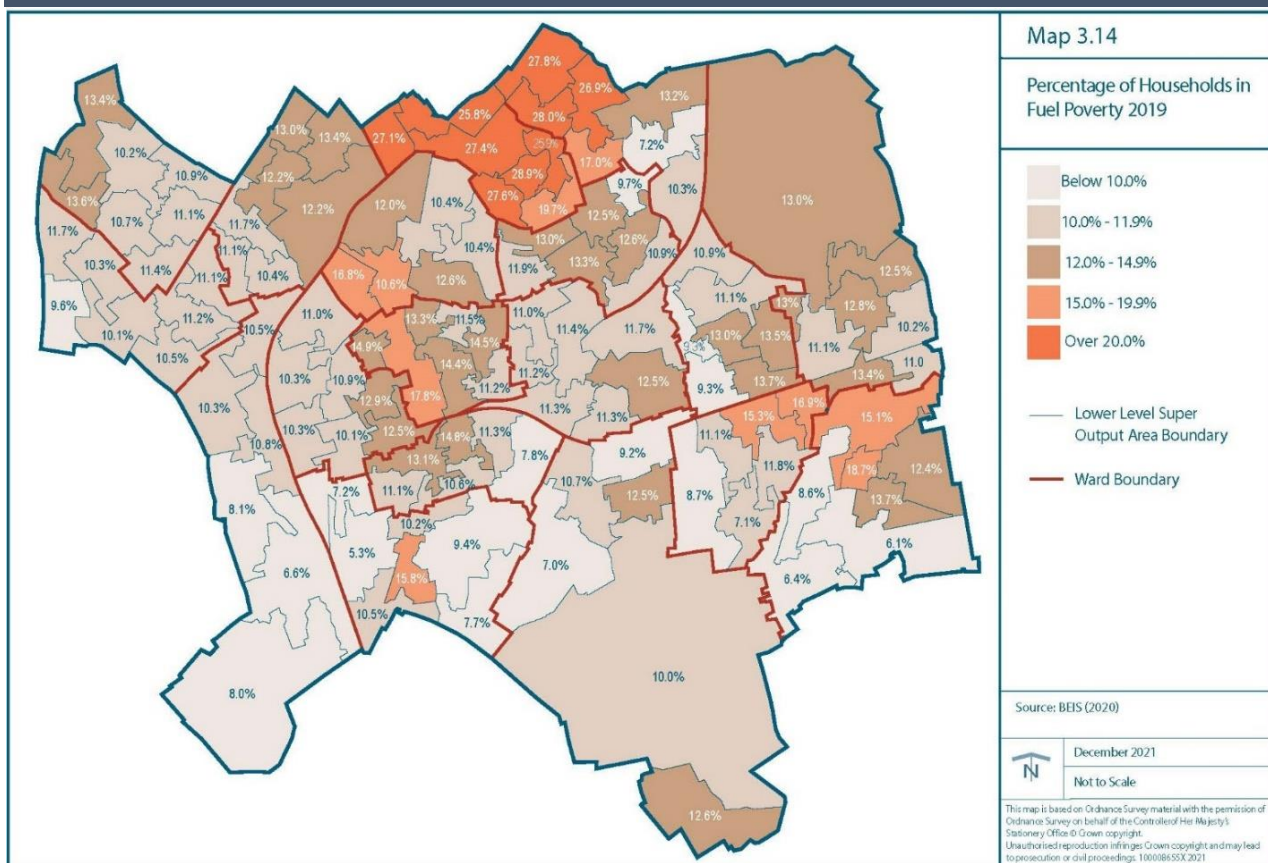
Source: Sub-regional fuel poverty data for 2018, Department for Business, Energy & Industrial Strategy (BEIS) April 2021

Figure 4.10: Percentage of Fuel Poor Households in Sutton and South London 2011-19



Source: Sub-regional fuel poverty data, Department for Business, Energy & Industrial Strategy (BEIS) April 2020

Map 4.4: Percentage of Fuel Poor Households in Sutton and South London 2019⁵⁴



⁵⁴ the most recent set of Sub-Regional Fuel Poverty data (BEIS, April 2021) which contains a complete statistical breakdown at local authority and LSOA level relates to 2019 (see <https://www.gov.uk/government/collections/fuel-poverty-sub-regional-statistics>). Within the context of the significant rise in fuel costs and household energy bills since the start of the Russia-Ukraine conflict in February 2022, Figure 3.36 and Map 3.14 therefore underestimate the extent of fuel poverty as it is currently affecting households across the Borough. It should also be noted that following the publication of the Government's Fuel Poverty Strategy (BEIS, February 2021), the new Low Income Low Energy Efficiency (LILEE) metric has been adopted and the fuel poverty datasets for 2019 are the first to be published using this metric. These figures and maps are therefore not directly comparable with previous fuel poverty datasets which were based on the now discontinued Low Income High Costs (LIHC) definition.





Fuel poverty risk index - Open Data Institute 2022 (alternative)

Note: The Open Data Institute (ODI)⁵⁵ has recently published a new annual fuel poverty risk index, which calculates a score that estimates the risk of someone being in fuel poverty by local authority based on the demand for energy, the levels of poverty and available support. Key fuel poverty indicators for LB Sutton as of 2022 are set out below in comparison with the South London average, London and England.

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

Source: Open Data Institute Fuel Poverty Risk Index January 2023

Enterprises in LB Sutton by Employment Size Band⁵⁶

Size of Enterprises	2021	2022	Change 2021-22
Large enterprises in LB Sutton (250+ employees)	25	25	No change
Medium enterprises in LB Sutton (50-249 employees)	75	80	+5 (+6.7%) 
Small enterprises in LB Sutton (10-49 employees)	490	475	-15 (-3.1%) 
Micro enterprises in LB Sutton (0-9 employees)	8,030	7,865	-165 (-2.1%) 
Total number of enterprises in LB Sutton	8,620	8,446	-174 (-2.0%) 

Source: ONS Enterprises by Employment Size Band – Table 10 – January 2023

HOUSING

Net Additional Dwellings Completed 2012-13 to 2021-22

Year	Net Additional Dwellings		Difference	Target Met?
	Target	Completions		
2012-13	210	227	+17	✓
2013-14	210	340	+130	✓
2014-15	210	439	+229	✓
2015-16	363	406	+43	✓
2016-17	427	639	+212	✓
2017-18	427	697	+270	✓
2018-19	427	575	+148	✓
2019-20	427	559	+132	✓
2020-21	313*	335	+22	✓
2021-22	469	633	+164	✓
Total	3636	4,850	+1,367	✓

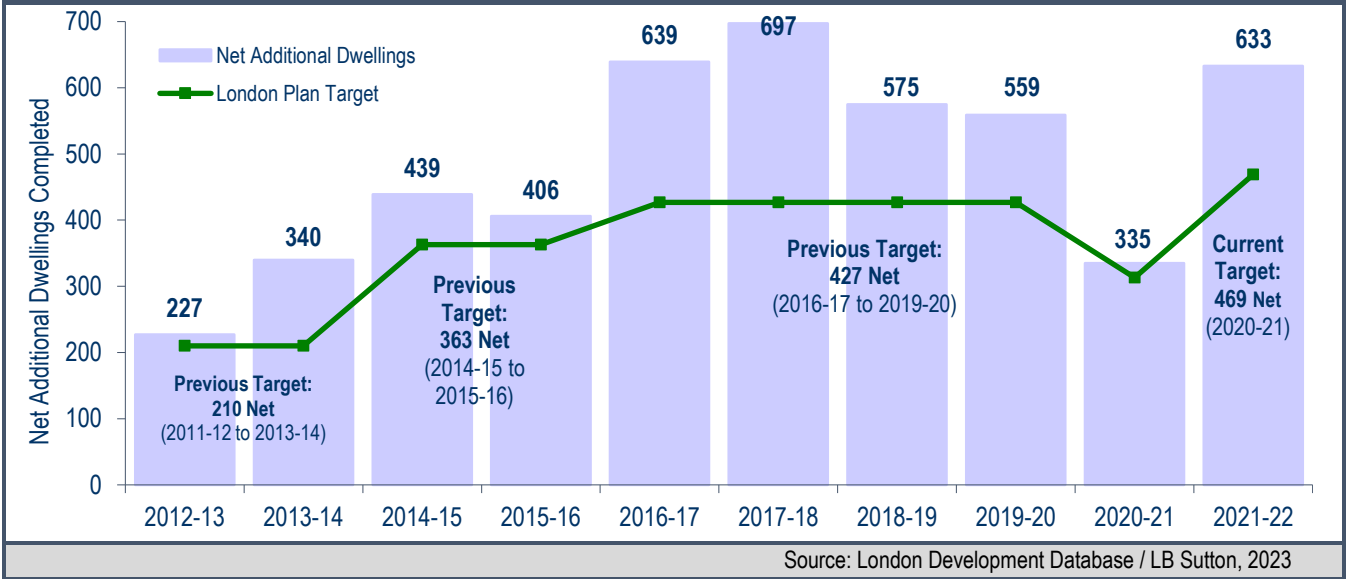
London Development Database / LB Sutton, 2023

Commentary: Since the start of the Local Plan period in 2016-17 the Council has exceeded its housing target in four years of the five years and cumulatively by +792 units. However, in 2020-21 335 net dwellings were delivered against a target of 469, meaning the housing target was missed for the first time in a decade. However, this monitoring period coincided with the national coronavirus lockdown announced on 23 March 2020. In recognition of this the Government, as part of the Housing Delivery Test measurement, reduced the 'homes required' within the 2020-21 year by four months (156 units for Sutton), giving Sutton a Housing Delivery Test figure of 313. Therefore, with a delivery of 335 net units in 2020-21, Sutton still met the Housing Delivery Test. In 2021-22 633 net additional units were completed, exceeding the target by 164 units.

⁵⁵ fuel poverty risk index data at local authority, regional and national level is available via the Open Data Institute's online Fuel Poverty Tool at <https://www.endfuelpoverty.org.uk/fuel-poverty-risk-index-reveals-areas-under-greatest-energy-bills-threat/>

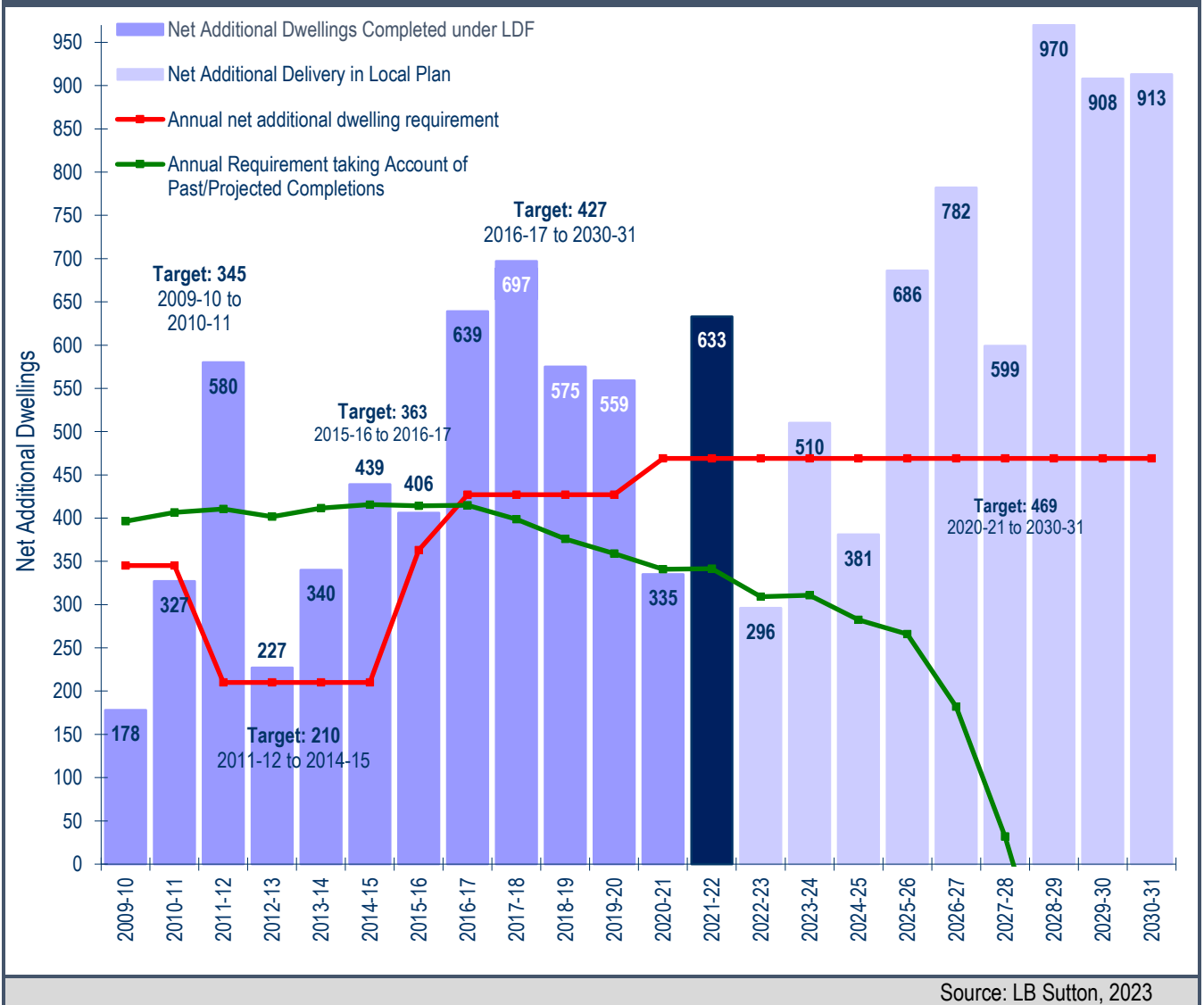
⁵⁶ an 'enterprise' is defined as the overall business, made up of all the individual sites or workplaces (local units). It is defined as the smallest combination of legal units (generally based on VAT and/or PAYE records) that has a certain degree of autonomy within an enterprise group

Figure 4.11: Net Additional Dwellings Completed in LB Sutton 2012-3 to 2021-22



Projected Housing Delivery in Future Years

Figure 4.12: Net Additional Dwellings Completed in LB Sutton since 2009-10 and Projected Delivery to 2030-31



Housing Delivery in Future Years

Commentary: The Strategic Housing & Economic Land Availability Assessment (SHELAA) identifies 6,410 net additional units that could be delivered from 2016-31, an average of 427 net dwellings per annum. A significant proportion of this would be delivered in the first five years of the Local Plan, largely due to large sites coming forward in Sutton Town Centre, the Felnax site, Hackbridge (+805 net dwellings) and large office to residential conversions.

Location of housing growth 2016-17 to 2020-21 (Local Plan Policy 1: Sustainable Growth)

Broad Location	Sustainable Growth Target (Local Plan Policy 1)	Housing delivery to Date	Difference
Sutton Town Centre	55%	40%	-15%
Hackbridge	15%	15%	0%
Wallington	10%	9%	-1%
Other District Centres	10%	5%	-5%
Rest of Borough	10%	30%	+20%

Five-Year Housing Land Supply Assessment 2022-23 to 2026-27 (as of April 2022)

Target	Local Plan	London Plan	Projected Delivery	Target met?
Annual Target	427	469	2,823	n/a
Five-Year Target	2,135	2,345		✓
Five-Year Target +5%	2,242	2,462		✓

Source: Sutton Authority Monitoring Report 2021-22 (LB Sutton, 2023)

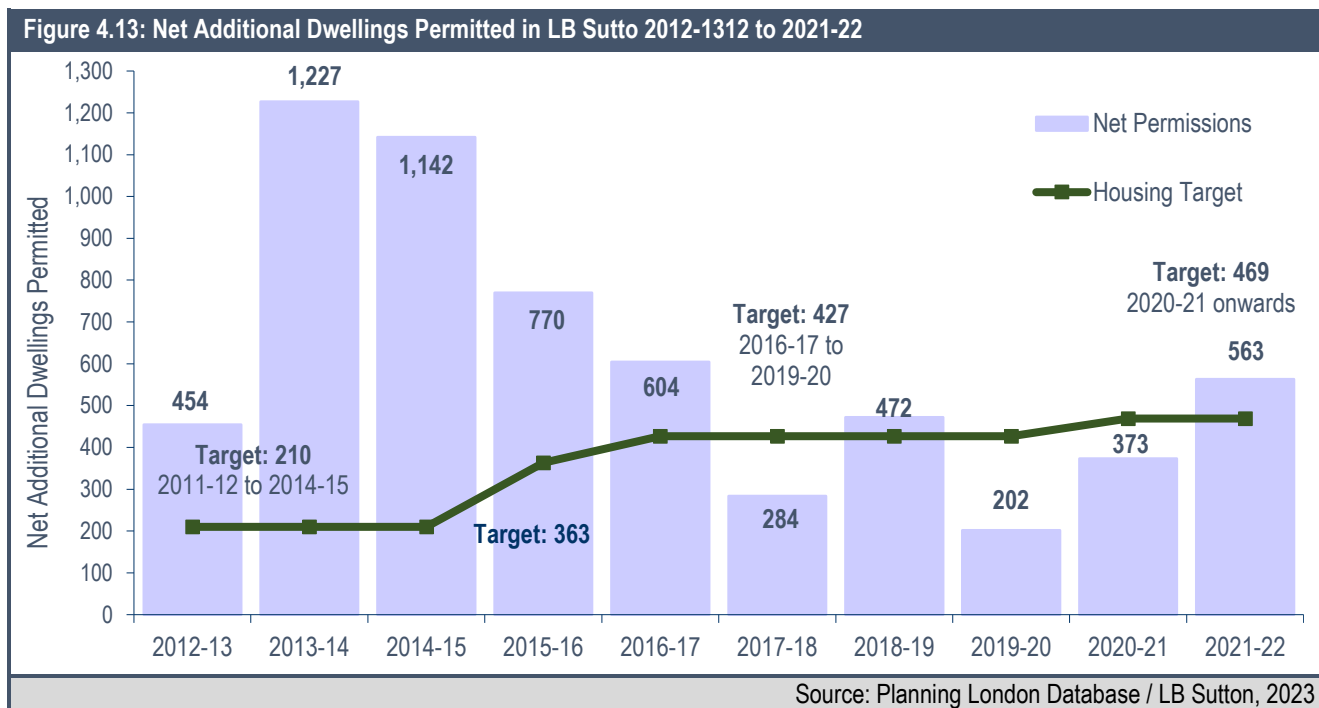
Affordable Housing Completions 2012-13 to 2021-22

Year	Affordable Housing	Target	% Housing Delivery	Target Met ?
2012-13	103	50%	45%	x
2013-14	52	50%	15%	x
2014-15	211	50%	48%	x
2015-16	44	50%	11%	x
2016-17	23	35%	4%	x
2017-18	310	35%	44%	✓
2018-19	143	35%	25%	x
2019-20	146	35%	26%	x
2020-21	35	35%	10%	x
2021-22	36	35%	6%	x
Total	1,103	35%	23%	x

Source: Planning London Database / LB Sutton, 2023

Commentary: Since 2012-13 the Council met the affordable housing target in one year only. In total 23% of housing delivery since 2012-13 was affordable (see Figure 4.10). However, whilst the affordable housing delivery is monitored against total housing delivery, the Local Plan Policy on affordable housing can only ask for an affordable housing contributions from, sites delivering 11 more units. It should also be noted that the Felnax site (805 units) delivered its affordable element upfront in previous years. Finally, since the introduction of office-to-residential permitted development over 900 units have been completed from this source, (including nearly 600 since the start of the Local Plan period) none of which was required to provide any affordable housing under the permitted development right rules, reducing the overall proportion of affordable housing delivered in this period.

Net Additional Dwellings Permitted 2011-12 to 2020-21



Gross Dwellings Completed by Location 2012-13 to 2021-22

Year	Gross Completions			Total
	Sutton TC	District Centres	Rest of Borough (inc. API areas)	
2012-13	21	74	167	262
2013-14	8	34	336	378
2014-15	73	122	357	552
2015-16	66	60	306	432
2016-17	276	68	366	710
2017-18	250	109	649	1,008
2018-19	131	164	343	638
2019-20	364	49	195	608
2020-21	68	61	224	353
2021-22	226	258	161	645
Total	1,483	999	3,104	5,586

Source: Planning London Database / LB Sutton, 2023

Commentary: Since 2016-17, 44% of gross dwellings were completed in town centres against 44% for the 10-year period

Gross Dwellings Completed on Backgarden Land 2012-13 to 2021-22

Year	Backgarden Completions	Other Completions	Total	% Backgarden
2012-13	14	248	262	5%
2013-14	16	362	378	4%
2014-15	13	539	552	2%
2015-16	16	416	432	4%
2016-17	26	684	710	4%
2017-18	35	973	1,008	3%
2018-19	17	621	638	3%
2019-20	9	599	608	1%
2020-21	4	349	353	1%
2021-22	0	645	645	0%
Total	173	5,405	5,578	3%

Commentary: In 2021-22 zero dwellings were completed in on backgarden land, representing 0% of all gross dwellings completed that year. This figure has averaged 2% since the start of the Local Plan period in 2016-17.

Gross Dwellings Completed by Development Type 2012-13 to 2021-22

Year	New-Build	Change of Use	Conversion	Extension	Total
2012-13	198	21	37	6	262
2013-14	260	48	67	3	378
2014-15	372	128	45	7	552
2015-16	157	235	40	0	432
2016-17	191	441	71	7	710
2017-18	794	122	74	18	1,008
2018-19	470	128	28	12	638
2019-20	527	38	33	10	608
2020-21	198	85	17	53	353
2021-22	427	175	10	33	645
Total	3,594	1,421	422	149	5,586

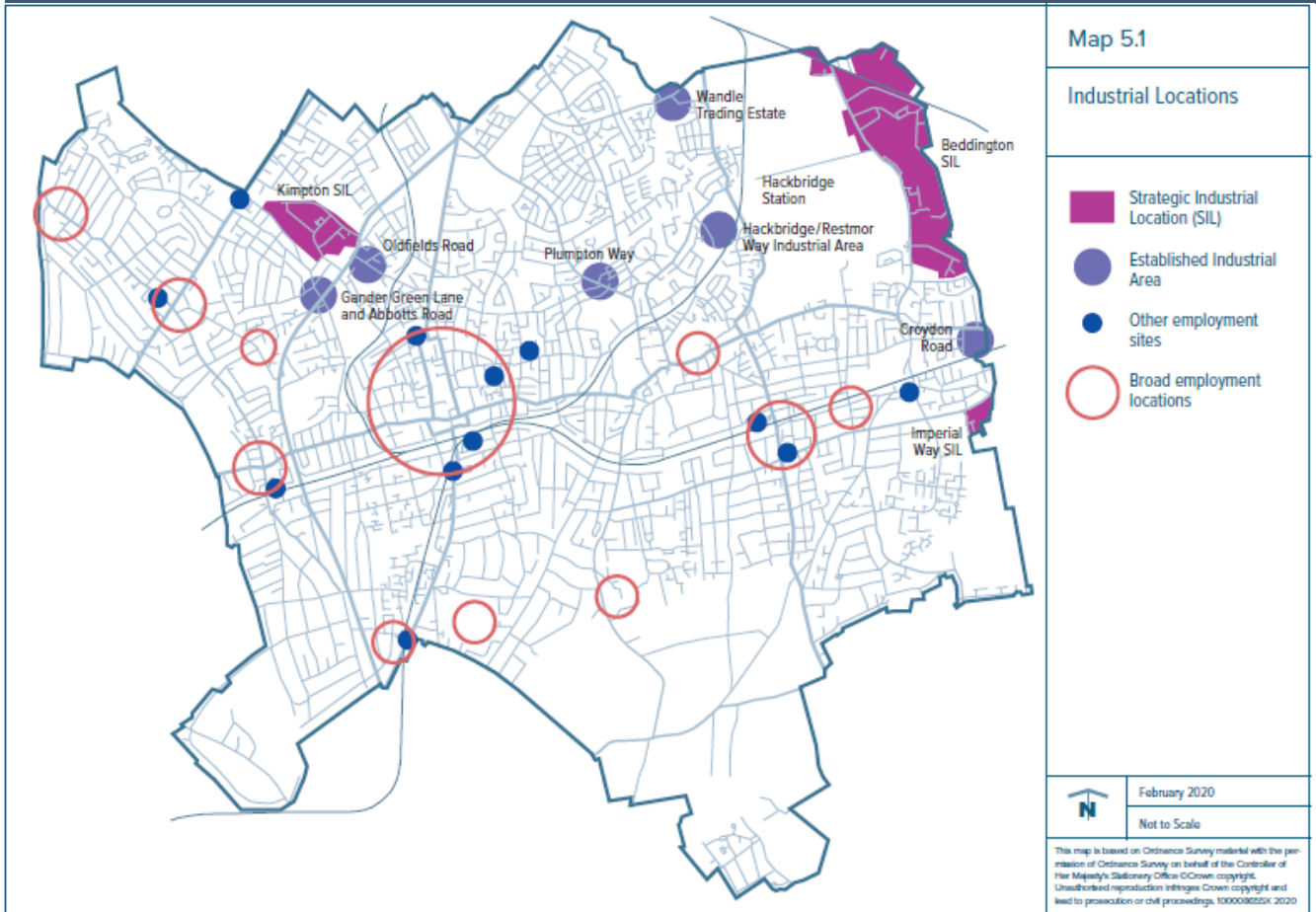
Source: Planning London Database / LB Sutton, 2023

EMPLOYMENT

Industrial Land

Industrial Location	Area (ha)
STRATEGIC INDUSTRIAL LOCATIONS	
Beddington SIL	105.8 ha
Kimpton SIL	18.8 ha
Imperial Way SIL	5.9 ha
Total	130.5 ha
ESTABLISHED INDUSTRIAL LOCATIONS	
Felnex Trading Estate	1.3 ha
Wandle Valley Trading Estate	0.3 ha
Croydon Road	3.9 ha
Gander Green Lane & Abbots Road	0.7 ha
Oldfields Road	0.6 ha
Restmor Way	3.4 ha
Plumpton Way and Gas Holder	1.1 ha
Total	11.3 ha
BOROUGH TOTAL	
Total	141.8 ha

Map 4.5: Main Locations for Industry

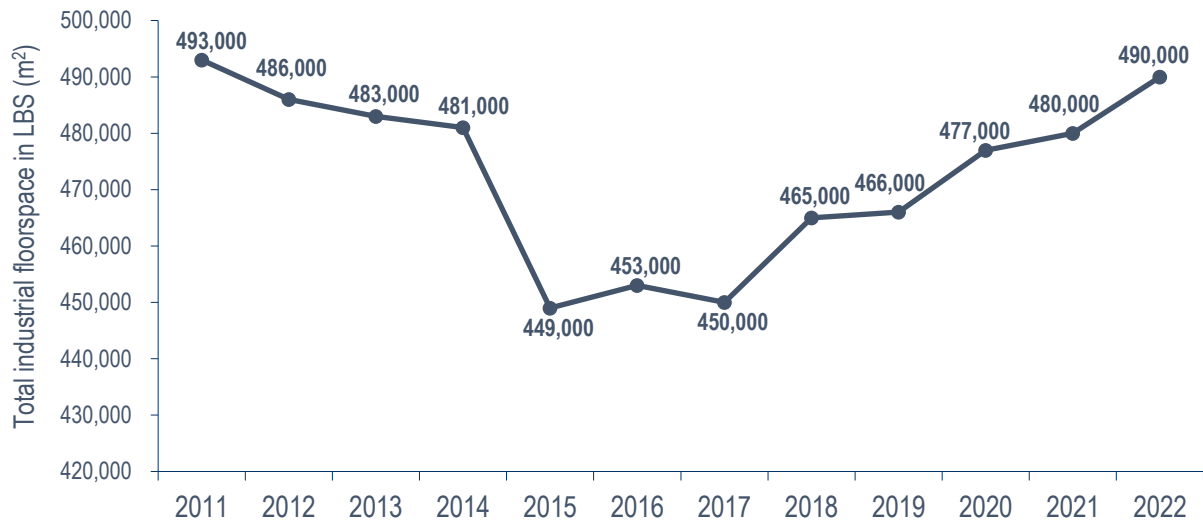


Total stock of industrial floorspace and vacancy rate

Change in total stock of industrial floorspace and vacancy rates in LB Sutton 2018 to 2022					
	2018	2019	2020	2021	2022
Total stock (m ²) - 1 March	465,000	466,000	477,000	480,000	490,000
Change in floorspace (m ²)		1,000	11,000	3,000	10,000
Change in floorspace (%)		0%	2%	1%	2%
Vacant floorspace Q1 (m ²)	1,102	1,354	394	394	28,422
% of vacant space of total	0.24%	0.29%	0.08%	0.09%	5.80%

Sources: Draft Employment Land and Economic Needs Assessment (Stantec Ltd on behalf of LB Sutton, Feb 2023)

Figure 4.14: Total stock of industrial floorspace within LB Sutton from 2011 to 2022



Commentary: There was a significant drop in the total stock of industrial floorspace in the Borough of circa 30,000 m² resulting from the loss of industrial space at the Felnex industrial estate in around 2014. However, since 2015 the Borough has seen a steady rise in industrial stock while over the same period all other south London boroughs experienced a decline.

Industrial floorspace in LB Sutton – take-up from 2018 to 2022

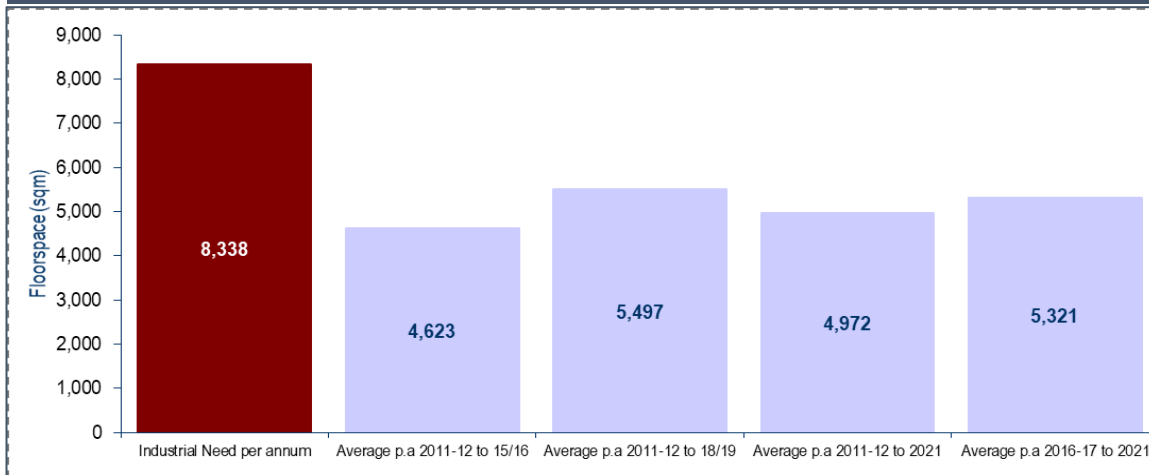
Annual take-up of industrial floorspace from 2018 to 2022					
Calendar Year	No. of transactions	Minimum size take up (m ²)	Maximum size take up (m ²)	Average unit size (m ²)	Total take-up (m ²)
2018	24	20	4,216	813	19,520
2019	14	45	1,969	448	6,278
2020	26	67	7,536	859	22,331
2021	16	140	4,297	774	12,391
2022	18	60	2,208	621	11,183
Total	98				71,702
Average 2018 -2022	20			732	14,340

Source: Employment Land and Economic Needs Assessment (Stantec Ltd on behalf of LB Sutton, Feb 2023)

Commentary: Based on the Employment Land and Economic Needs Assessment (Stantec Ltd, 2023), between 2018 and 2022, industrial floorspace take-up ranged from 6,278 m² in 2019 to 22,331 m² in 2020. Demand for industrial space across the Borough is currently strong and comes from a variety of industrial sectors. Demand mainly comes from third party logistics (3PLs) and e-commerce for ‘last-mile’ hubs, as well q-commerce, trade counter operators, and those companies servicing other industries such as the construction industry.

Industrial floorspace in LB Sutton – Future requirements

Figure 4.15: Industrial floorspace need per annum within LB Sutton

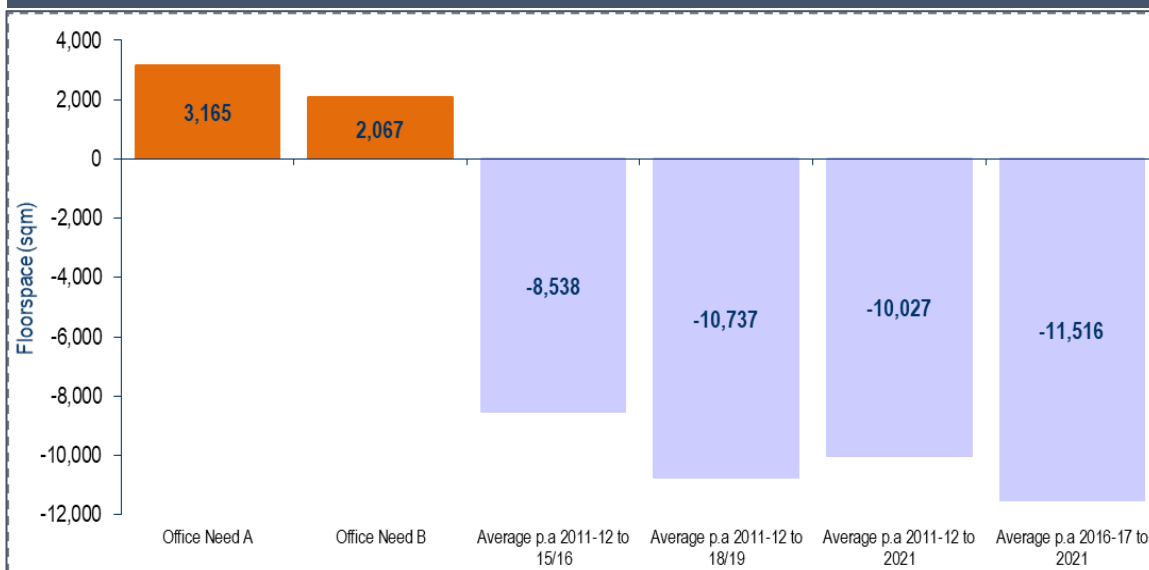


Source: Employment Land and Economic Needs Assessment (Stantec Ltd on behalf of LB Sutton, Feb 2023)

Commentary: Based on ELENA, there is a high demand for new space, low levels of current supply and very low vacancy rates. This creates a requirement for 167,000 sq.m. (or 8,338 sq.m. per annum) of industrial floorspace (encompassing light and general industry and logistics and distribution) or 26 ha (using the London Plan lot ratio of 65%).

Office floorspace – Past delivery and future need

Figure 4.16: Office need and past delivery within LB Sutton



Commentary: Demand for office space in LB Sutton has been weak in recent years. Even prior to the pandemic in 2020, the growth in office jobs was not resulting in an increase in demand for additional floorspace. However the Employment Land and Economic Needs Assessment (Stantec Ltd, 2023) forecasts strong jobs growth over the next 10-15 years, which translates into a high office need figure of 63,304 sq.m. (or 3,165 sq.m. per annum).

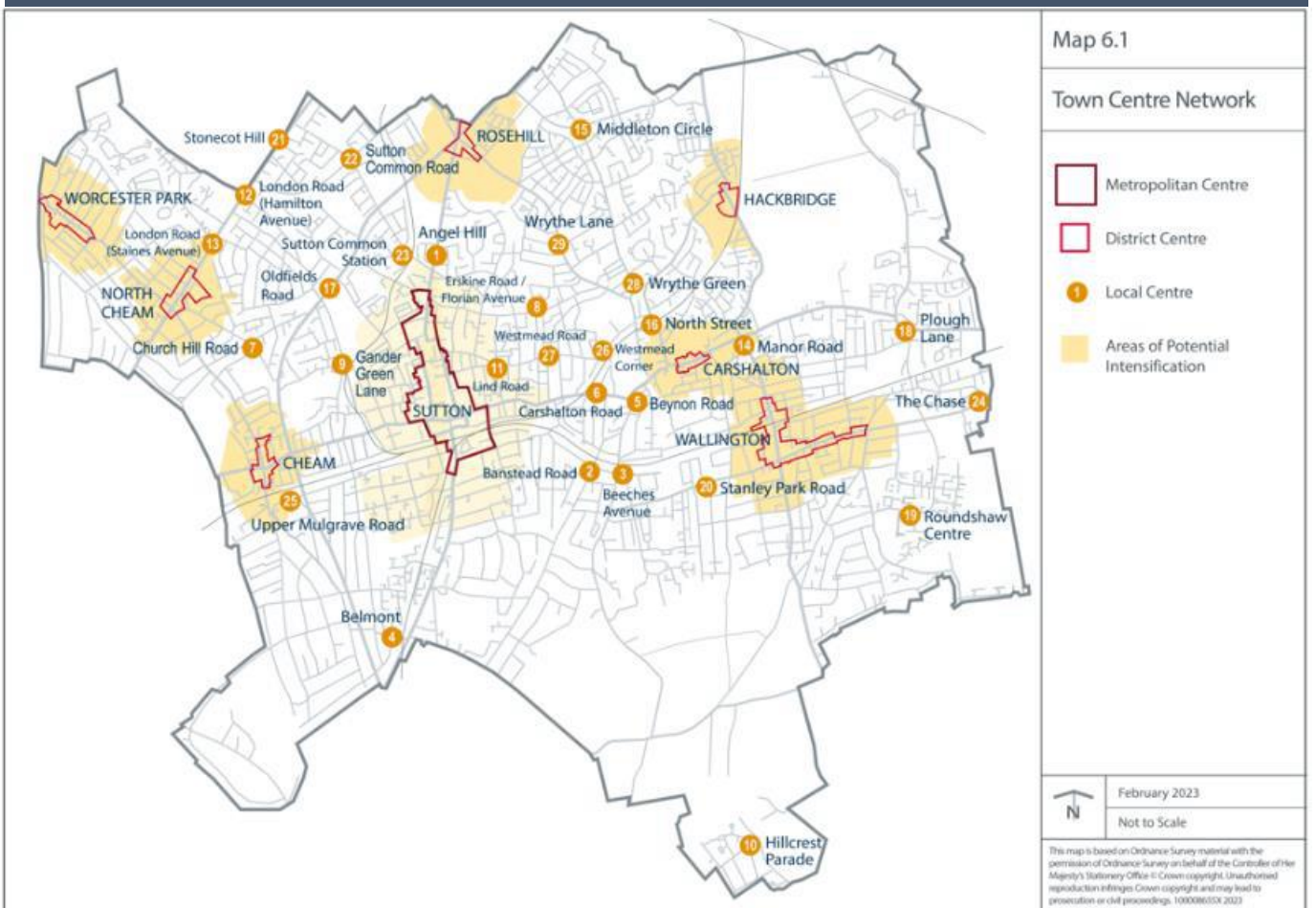
TOWN CENTRES

Town centre network within LB Sutton

Metropolitan Centre	District Centres (7)	Local Centres (29)			
Sutton Town Centre	Carshalton	Angel Hill	Erskine Road /Florian Avenue	Middleton Circle	Sutton Common Road
	Cheam	Banstead Road	Gander Green Lane (Sutton West Station)	North Street (Carshalton Station)	Sutton Common Station
	Hackbridge	Beeches Avenue (Carshalton Beeches)	Hillcrest Parade, Clockhouse	Oldfields Road	The Chase, Stafford Road
	North Cheam	Belmont	Lind Road	Plough Lane, Beddington	Upper Mulgrave Road
	Rosehill	Beynon Road	London Road (corner of Hamilton Avenue)	Roundshaw Centre	Westmead Corner
	Wallington	Carshalton Road	London Road (corner of Staines Avenue)	Stanley Park Road	Westmead Road
	Worcester Park	Church Hill Road	Manor Road, Wallington	Stonecot Hill	Wrythe Green Wrythe Lane

Source: Sutton Town Centre Health Check 2022

Map 4.6: Town Centre Network



Sutton Town Centre

Sutton Town Centre Profile

Commentary:

- Sutton Town Centre is the main retail and leisure destination in the borough and one of four Metropolitan Centres within South London together with Croydon, Bromley and Kingston. It is located about 16 km south of central London and eight km west of Croydon
- Sutton Town Centre is well-connected to London and Surrey. It offers rail services to London Victoria (the fastest journey time is 30 minutes), London Blackfriars and London Bridge as well as to Croydon, Epsom and Wimbledon. It is also served by 13 bus routes, providing comprehensive links to all parts of the borough and beyond. Consequently, it enjoys a Public Transport Accessibility Level (PTAL) rating of 5 rising to 6a (6b being the highest or most accessible). A possible extension of the Tramlink network, which will connect the town centre to Morden and beyond via Rosehill, would further increase its overall accessibility
- The Local Plan sets targets for Sutton Town Centre and its Area of Potential Intensification (API) to deliver 3,000 m² of net additional convenience retail (A1); 23,200 m² of comparison retail; 5,000 m² food/beverage (A3-A5); 23,000 m² office; & 3,400 net additional homes over the plan period (2016-31)
- The Sutton Town Centre Masterplan (2016) identified a range of public realm improvements and infrastructure measures, including extending Tramlink
- Sutton Town Centre (linked with the London Cancer Hub) is identified as an Opportunity Area in the London Plan 2021, under the category of the 'Trams Triangle'. The proposal to extend the Tram to Sutton Town Centre, and potentially beyond to the LCH is highlighted, with the aim of improving public transport accessibility to the town centre and St. Helier Hospital, and support the delivery of new homes and new jobs. The London Plan suggests this could unlock the delivery of 5,000 homes and 3,500 jobs in Sutton Town Centre. However, in 2020 the tramlink extension to Sutton was officially 'paused' due to a funding gap. In September 2023, the Mayor's Transport Committee confirmed that they were no longer able to commit funding. Given that the Sutton Opportunity Area was predicated on the delivery of tramlink, the status of this designation is now unachievable if the extension is not delivered or alternative major transport inventions are delivered to Sutton Town Centre and beyond
- Following consultation on the STC Conservation Area Character Appraisal and Management Plan (CAAMP) in 2019, the Conservation Area boundaries have been significantly extended. An STC 'Heritage Action Zone' partnership was launched in April 2017, involving Historic England, the Council, the 'Successful Sutton' Business Improvement District (BID) and local groups.
- The town centre is characterised by its strong linear form and pronounced slope from south to north. The commercial core stretches for about a mile, between Sutton Green in the north and the Subsea7 offices in the south. The pedestrianised High Street is the main public space, linking a number of other paved and green spaces within the town centre and on its edges.
- East-west connections across the town centre and into the surrounding area are not always welcoming and legible, lacking clear routes and landmarks. The traffic-dominated gyratory road system, parallel to the pedestrianised High Street on both sides, provides a barrier to east-west movements

Sutton Town Centre Health Check 2022

Commentary: The latest Sutton Town Centre Health Check was undertaken in 2022 in order to provide an up-to-date picture of how the town centre is performing and as a key part of the evidence base for Sutton's new Local Plan. The information used to compile the Sutton Town Centre Health Check report and summarised below is based on a comprehensive land-use survey carried out by council officers in winter 2022 as well as desk based research. It is important to note since the last town centre review, the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 have introduced three new use classes as follows:

Use Class E – Commercial, Business and Service

This use class brings together existing classes A1 (shops), A2 (financial and professional services), A3 (restaurants and cafes) and B1 (business) as well as parts of classes D1 (non-residential institutions) and D2 (assembly and leisure) into one single use class to allow for changes of use without the need of planning permission.

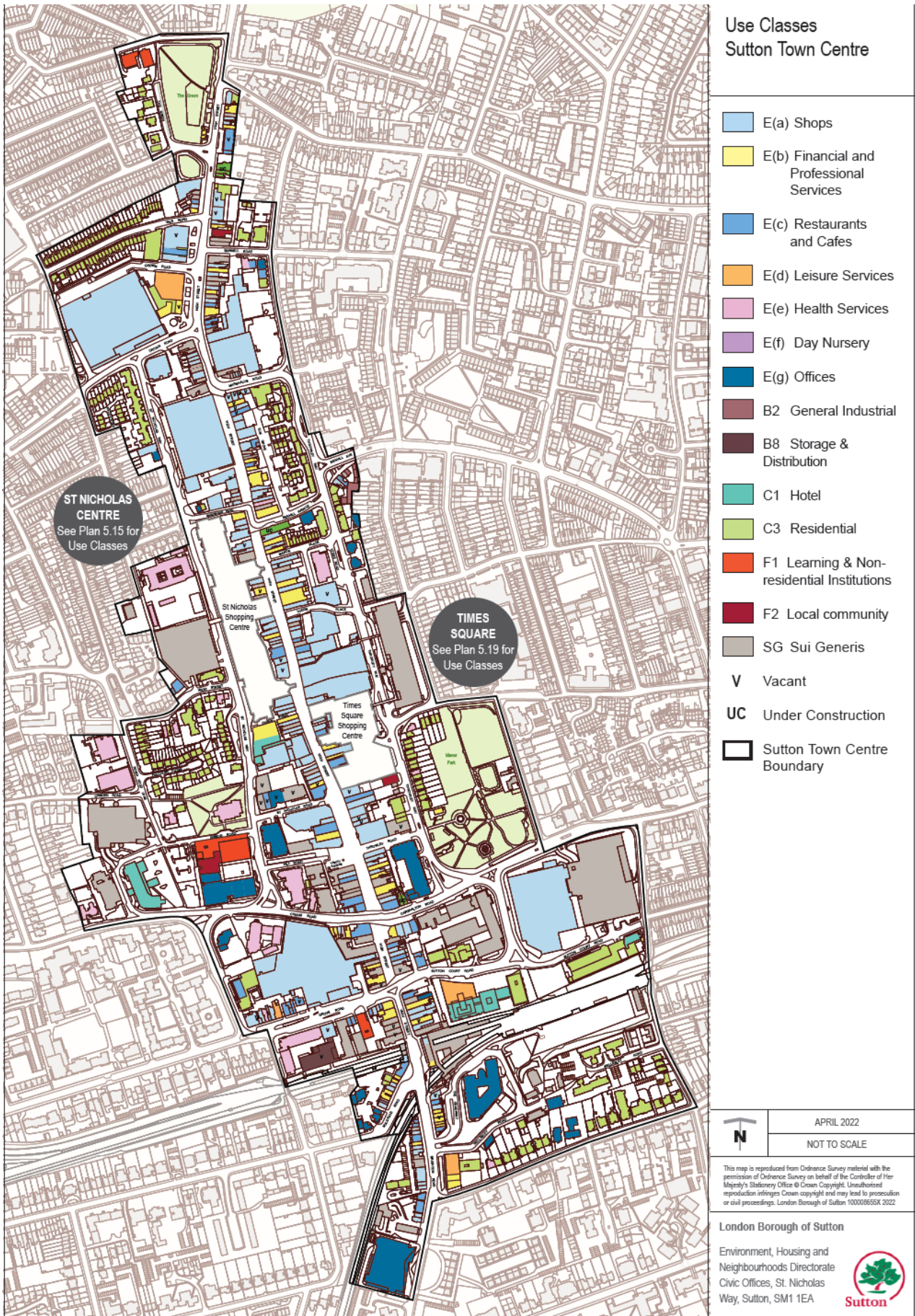
Use Class F1 – Learning and non-residential institutions

This use class brings together some elements of Use Class D1 namely, schools, colleges etc., galleries, museums, public libraries, public halls or exhibition halls and churches etc.

Use Class F2 – Local community uses

This use class is designed to protect local community assets and includes shops smaller than 280m² with no other shop within a 1,000m (1km) radius, a hall or meeting place for the principal use of the local community (was use class D1), outdoor sport or recreation locations (was D2(e) use class) and swimming pools or skating rinks (was D2(e) use class).

Map 4.7: Use Classes in Sutton Town Centre



Total Units and Floorspace in Sutton Town Centre (all retail frontages)				
Use Class	Total Units	% of Units	Floorspace (m ²)	% Floorspace
E(a)	161	37%	103,872 m ²	40%
E(b)	54	12%	11,202 m ²	4%
E(c)	43	10%	10,867 m ²	4%
Ed)	9	2%	7,231 m ²	3%
E(e)	7	2%	4,521 m ²	2%
E(g)	11	3%	40,517 m ²	16%
F1	4	1%	3,171 m ²	1%
F2	4	1%	1,416 m ²	1%
SG	79	18%	31,491 m ²	12%
Vacant	61	14%	46,075 m ²	18%
Total	433	100%	260,363 m²	100%

Unit Change since 2018 in Sutton Town Centre (all retail frontages)			
Previous Use Class	2018	2022	Change 2018-2022
B8	1	0	-1
E(a)	176	161	-15
E(b)	47	54	+7
E(c)	41	43	+2
Ed)	7	9	+2
E(e)	7	7	0
E(g)	12	11	-1
F1	3	4	+1
F2	2	4	+2
SG	74	79	+5
Vacant	67	61	-6
Total	137	433	-1

Convenience versus comparison retail units and floorspace for E(a) uses (GOAD) in the Northern Secondary Frontage of Sutton Town Centre				
GOAD Sub- Class	Units	Units (%)	Floorspace (m ³)	Floorspace (%)
Comparison	98	49.7%	63,492 m ²	50.8%
Covenience	25	12.7%	32,696 m ²	26.3%
Retail Service	38	19.3%	7,643 m ²	7.4%
Vacant Retail	36	18.2%	21,141 m ²	16.9%
Total	197	100%	124,972 m²	100%

District Centres

Figure 4.17: District Centre Health Checks – Use Class by Total Floorspace

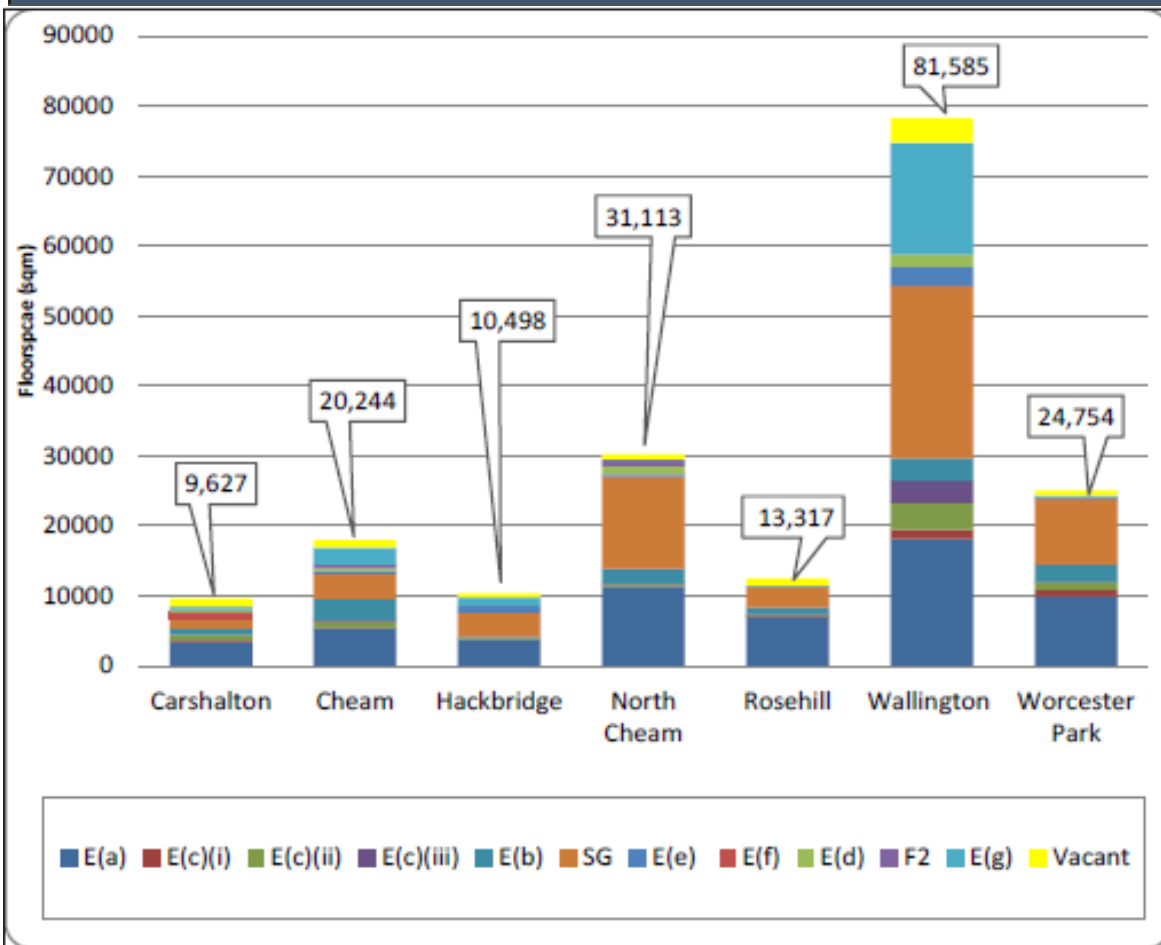
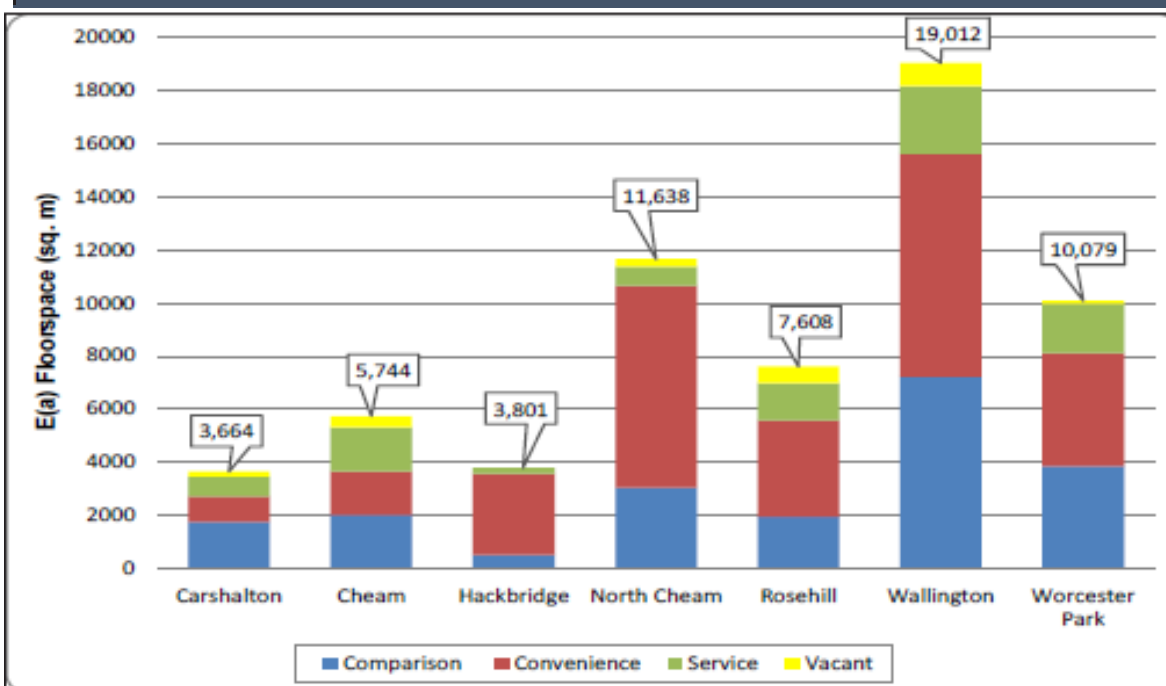


Figure 4.18: District Centre Health Checks - Retail Classification by amount of floorspace (m²)

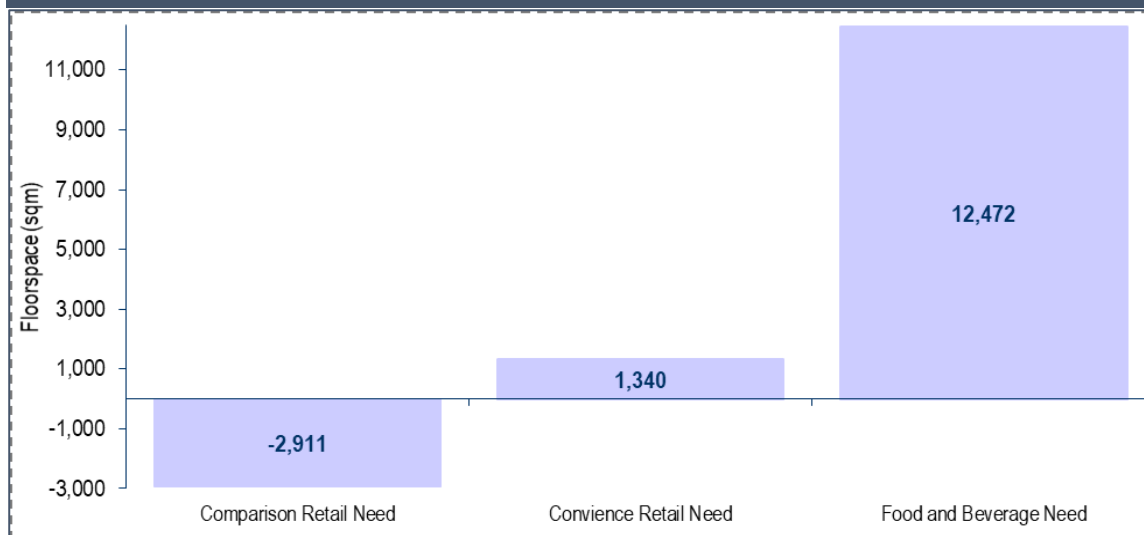


District Centres - Vacant Units and Floorspace

District Centre	Total Vacancies	Total Vacant Floorspace	Vacancy Rate (units)	Vacancy Rate (floorspace)
Carshalton	7	1,136	9.9%	11.8%
Cheam	10	1,075	7.7%	5.3%
Hackbridge	2	547	5.4%	5.2%
North Cheam	10	793	9.6%	2.5%
Rosehill	11	1,132	12.5%	8.5%
Wallington	23	3,501	8.3%	4.3%
Worcester Park	7	731	4.5%	3.0%
Total	70	8,915	8.1%	4.7%

Future need for comparison retail, convenience retail and food & beverage uses

Figure 4.19: Comparison retail, convenience retail and food & beverage need in LB Sutton



Commentary: The Town Centres and Retail Needs Assessment (TCRNA 2023) concludes that for comparison shopping, Sutton has a surplus of floorspace (-2,911 sq.m.) and, for convenience retail, there is a small need (1,340 sq.m.) over the plan period. For food and beverage there is an identified need of 12,472 sq.m. by 2041.

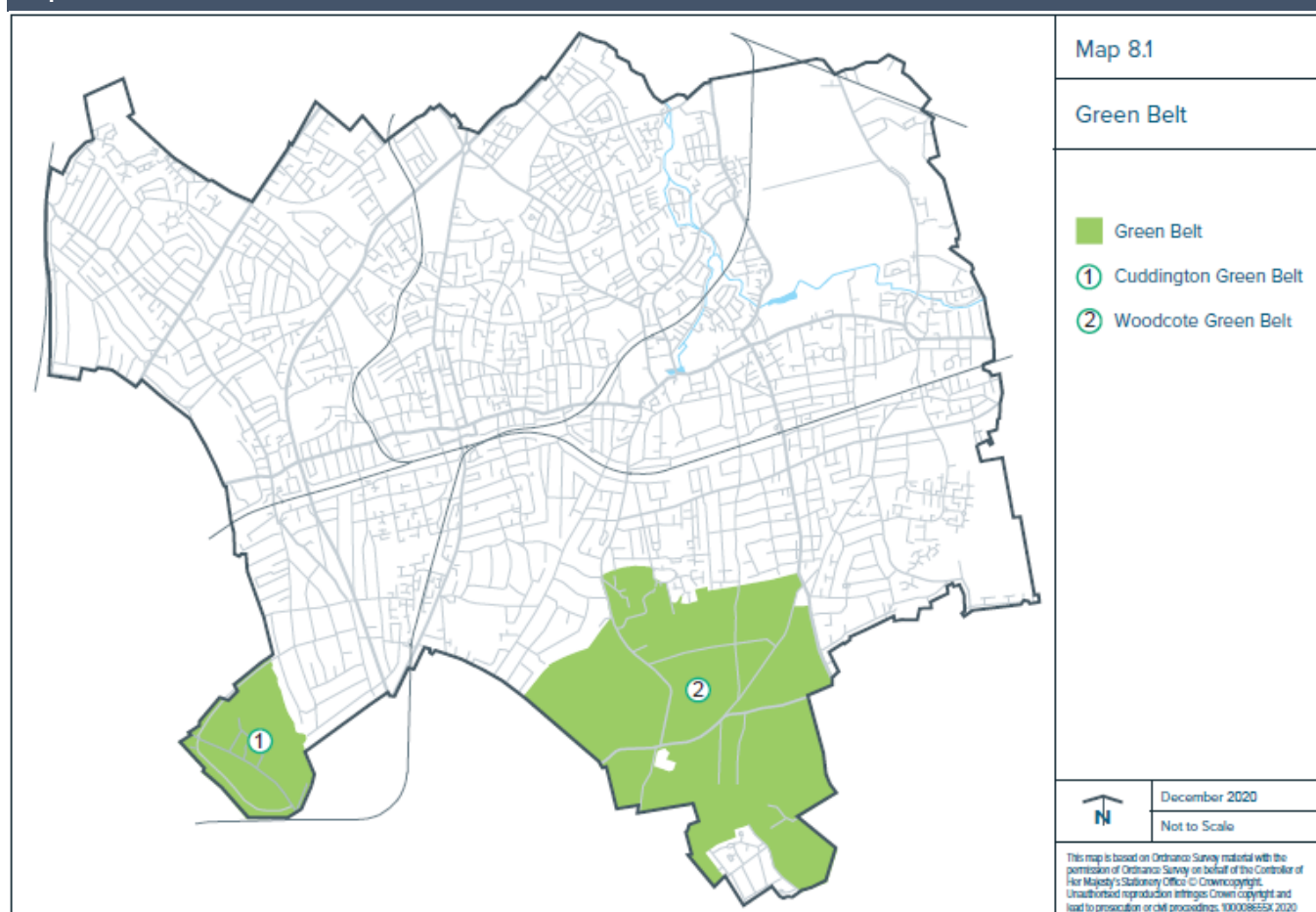
OPEN SPACE

Green Belt

Location	Area (ha)
(1) Cuddington	106.7
(2) Woodcote	499.2
TOTAL	605.9

Source: Sutton Local Plan Appendix 2018 (Schedule 5.A)

Map 4.8: Green Belt

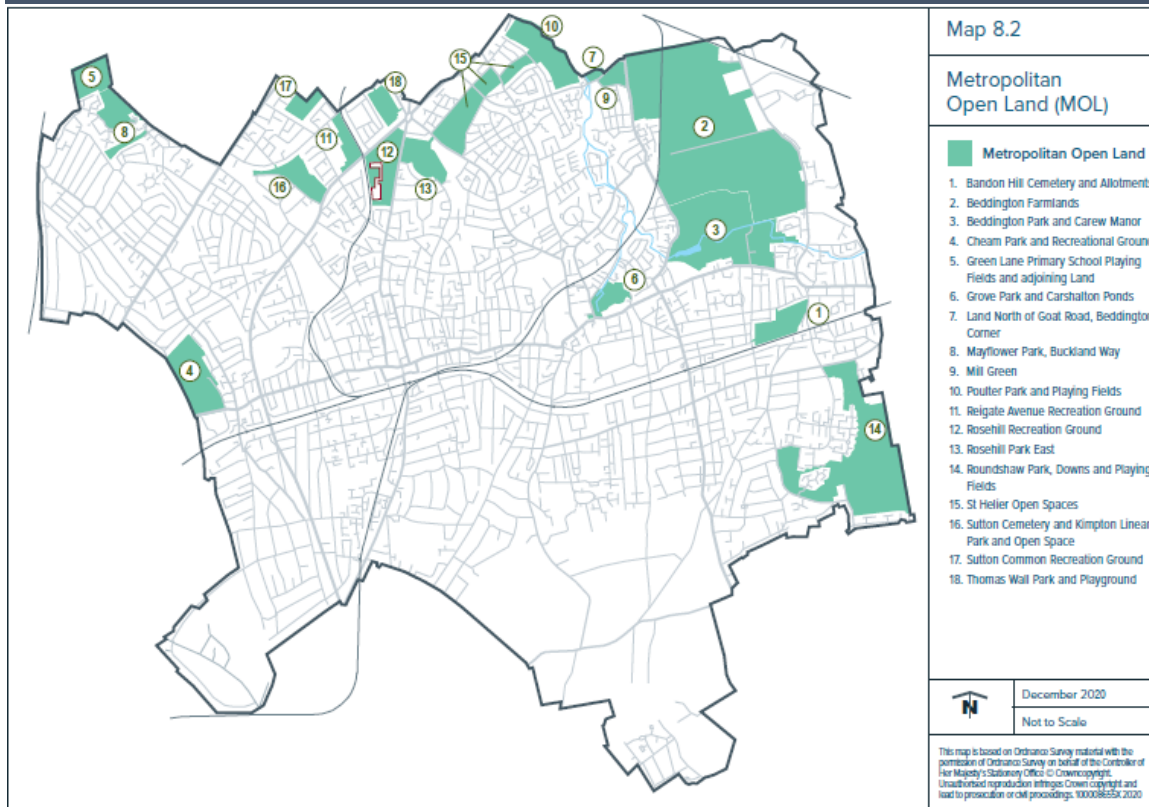


Metropolitan Open Land (MOL)

Location	Area (ha)	Location	Area (ha)
1: Bandon Hill Cemetery and Allotments	11.9	10: Poulter Park and Playing Fields	21.4
2: Beddington Farmlands	194.7	11: Reigate Avenue Rec.	6.3
3: Beddington Park and Carew Manor	64.2	12: Rosehill Recreation Ground	16.6
4: Cheam Park and Recreation Ground	26.2	13: Rosehill Park East	12.7
5: Green Lane Primary School	11.3	14: Roundshaw Park, Downs and Playing Fields	84.3
6: Grove Park and Carshalton Ponds	8.7	15: St Helier Open Space (3 parts)	25.0
7: Land North of Goat Road	2.2	16: Sutton Cemetery & Kimpton Linear Park	12.3
8: Mayflower Park, Buckland Way Recreation Ground &	12.8	17: Sutton Common Recreation Ground	6.4
9: Mill Green	5.0	18: Thomas Wall Park & Playground	7.1
		Total	529.1

Source: Sutton Local Plan Appendix 2018 (Schedule 5.B)

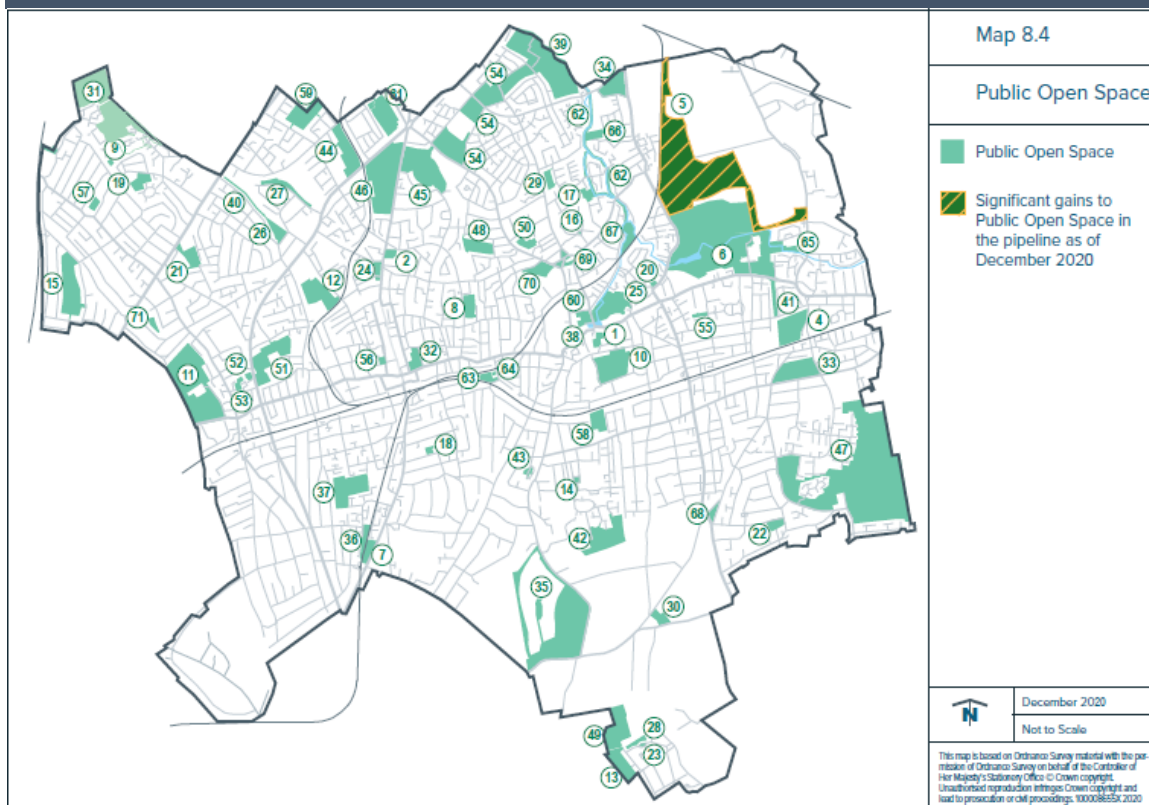
Map 4.9: Metropolitan Open Land (MOL)



Public Open Space

	Total public open space (ha)	Borough Population (Census)	POS(ha) per 1,000 population
2011	526.7 ha	190,146	2.77 ha
2021	519.5 ha	209,640	2.48 ha

Map 4.10: Public Open Space



Restoration of Beddington Farmlands

The restoration of Beddington Farmlands will create an additional 44.4 ha of open space within the Borough in line with Local Plan Policies 5e and 26, Sutton's Biodiversity Action Plan, the Wandle Regional Park and the London Green Grid. When completed, this will enhance opportunities for residents to enjoy outdoor space and engage with wildlife and significantly add to the provision of open space and green infrastructure (GI) within the Borough

Under the terms of the original planning permission for the landfill, Viridor is required to restore the site by 2023. This includes the creation of a variety of new habitats such as wet grasslands and acid grassland / lowland heath, as well as the management and enhancement of existing habitats including lakes and islands, reedbeds, meadowlands, and 'displacement habitats' (e.g. old sludge lagoons). The overarching objectives for the restoration of the site are set out in the Conservation Management Scheme (CMS), which has seven objectives. The first six objectives relate to habitat creation and target species and the final objective concerns the delivery of appropriate public access. The CMS objectives are to be delivered through the Restoration Management Plan (RMP) and monitoring is undertaken by the Council in liaison with Viridor and the Conservation Science Group⁵⁷ (CSG).

Backgarden land

Restoration of Beddington Farmlands

LB Sutton has the highest percentage cover of backgarden land⁵⁸ of all London Boroughs at 33%. The average size of its gardens at 148m² puts Sutton at 4th place (out of 33 boroughs)

BIODIVERSITY AND HABITATS

Sites of Importance for Nature Conservation (SINCs)⁵⁹

No.	SINC	Grade	Area (ha)
SITES OF METROPOLITAN IMPORTANCE (GRADE I)			
1	The River Wandle	M91	24.30
2	Poulter Park Riverside		
3	Wandle Valley Hospital Wetland		
4	Dale Park		
5	Spencer Road Wetland		
6	Wilderness Island		
7	Beddington Farmlands	M92	202.96
8	Roundshaw Downs	M119	38.64
9	Woodcote Park Golf Course	M121	47.08
SITES OF BOROUGH IMPORTANCE (GRADE I)			
10	Queen Mary's Wood, Wellfield Plantation and Grasslands and Woodmansterne Rd Woodland	BI1	8.64
11	Greenshaw Wood and Rosehill Park East	BI2	6.25
12	Beddington Park	BI3	56.35
13	Sutton Ecology Centre	BI4	2.21
14	Ruffett, Blg Wood and Adjacent Meadow	BI5	9.31
15	Carshalton Road Pastures and Grove Lane Hedge	BI6	7.28
16	The Oaks Park and Golf Course	BI7	95.86
17	Cuddington Open Spaces and Golf Course)	BI8	56.74

⁵⁷ the CSG includes representatives from Viridor and Thames Water as major landowners and local nature conservationists. The CSG provides technical advice to Viridor on habitat creation and management and provides regular progress updates to the Conservation and Access Management Committee (CAMC)

⁵⁸ further details of backgarden land within LB Sutton and its value for habitats and green infrastructure is available via the GiGL CIC website at <https://www.gigl.org.uk/2022/07/21/suttons-garden-resource/>

⁵⁹ the site areas for each of the Borough's SINCS have provided by Greenspace Information for Greater London (GiGL) CIC (January 2020).

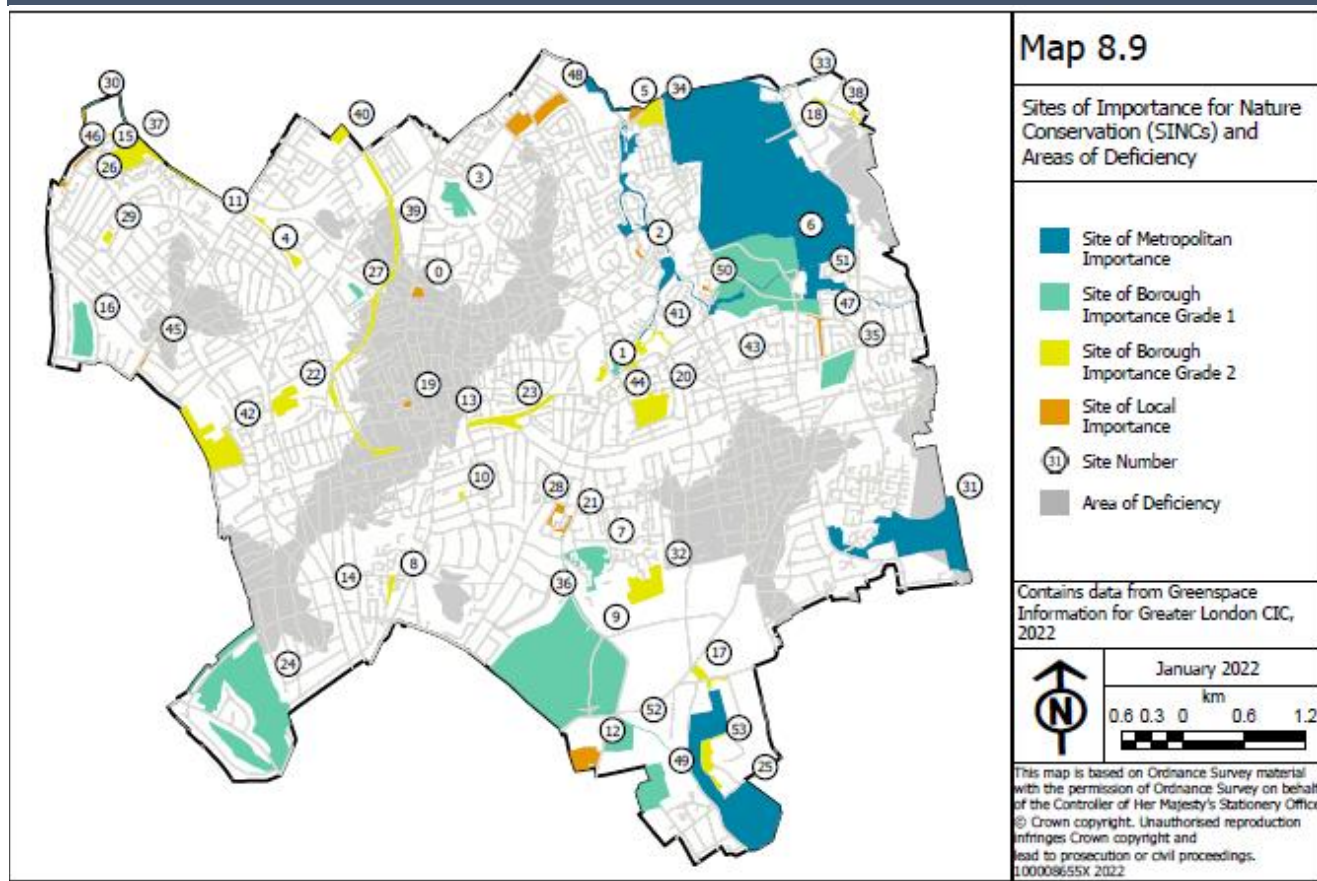
No.	SINC	Grade	Area (ha)
18	Bandon Hill Cemetery	BI9	7.85
19	Anton Crescent Wetland	BI10	1.17
20	Cuddington Recreation Ground	BI11	8.45
SITES OF BOROUGH IMPORTANCE (GRADE II)			
21	Sutton to St Helier Railway Line	BII1	12.52
22	Carshalton Ponds, Grove Park and All Saints Churchyard	BII2	5.20
23	St Philomena's Lake	BII3	0.99
24	The Warren Railway Lands	BII4	5.85
25	Water Gardens Bank	BII5	0.07
26	Devonshire Avenue Nature Area	BII6	0.42
27	Little Woodcote Wood	BII7	2.42
28	Woodcote Grove Wood	BII8	3.94
29	Belmont Pastures – North and South	BII9	1.20
30	Perrett's Field and Sutton Water Works	BII10	4.81
31	Mayflower Park	BII11	11.47
32	Mill Green	BII12	4.89
33	Cheam Park	BII13	14.14
34	Carshalton Park	BII14	8.91
35	Queen Mary's Park	BII15	8.44
36	Pine Walk	BII16	1.43
37	Sutton Common Paddock	BII17	1.66
38	38. Cuddington Cemetery	BII18	0.84
39	39. Pyl Brook	BII19	2.06
40	40. Therapia Lane Rough	BII20	1.36
SITES OF LOCAL IMPORTANCE (GRADE III) 41.27 ha			
41	Revesby Road Wood	L1	8.48
42	All Saints Churchyard, Benhillton	L2	0.91
43	St Nicholas Churchyard, Sutton	L3	0.40
44	Radcliffe Gardens Woodland	L4	0.97
45	The Avenue Primary School Nature Garden, Belmont	L5	0.14
46	London Road Edge, North Cheam	L6	0.73
47	Beverley Brook	L7	2.06
48	The Spinney (Nightingale Road Bird Sanctuary)	L8	0.4
49	Caraway Place Pond	L9	0.29
50	Barrow Hedges Primary School	L10	1.33
51	Queen Elizabeth Walk	L11	1.76
52	St Mary's Court Wildflower Area, Bute Road	L12	0.01
53	Lamberts Copse	L13	5.15
54	Land North of Goat Road	L14	1.08
Source: Sutton Local Plan Appendix 2018 (Schedule 6.B) and Green Space Information for Greater London			

Areas of Nature Conservation Deficiency⁶⁰

Area of Borough	Area of Deficiency (ha) / Percentage of Borough (%)			
	2018-19 (Local Plan adoption)	2019-20	2020-21	Change since 2018
4,385 ha	672.39 ha (15.3%)	672.39 ha (15.3%)	717.04 ha (16.4%)	+ 44.7 ha (+ 1.1%)

⁶⁰ Areas of deficiency (AoD) for nature conservation are defined as built-up areas more than one kilometre actual walking distance from an accessible Metropolitan or borough SINC. Calculated AoDs no longer include areas of green belt or MOL land in accordance with the relevant guidelines

Map 4.11: Sites of Importance for Nature Conservation and Areas of Deficiency



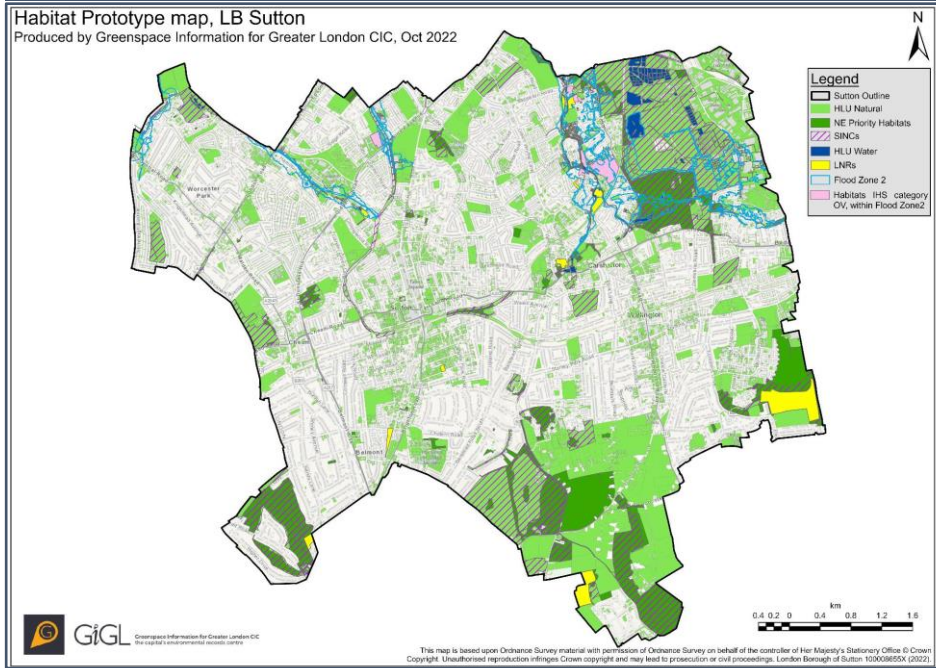
Borough Habitats

Commentary: LB Sutton boasts several important habitats, including the chalk spring fed River Wandle, the Beverley Brook and Pyl Brook. Chalk rivers are national priority habitats and support a rich diversity of species. Other key habitats include chalk grasslands, semi-natural woodland and wetlands. Sutton is home to a number of rare species such as the small blue butterfly, the flowering plant greater yellow rattle and stag beetles. The table below provides a breakdown of habitat types across the borough based on research undertaken by Greenspace Information for Greater London (GiGL) CIC on behalf of the Council as part of a BNG pilot project undertaken in October 2023.

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

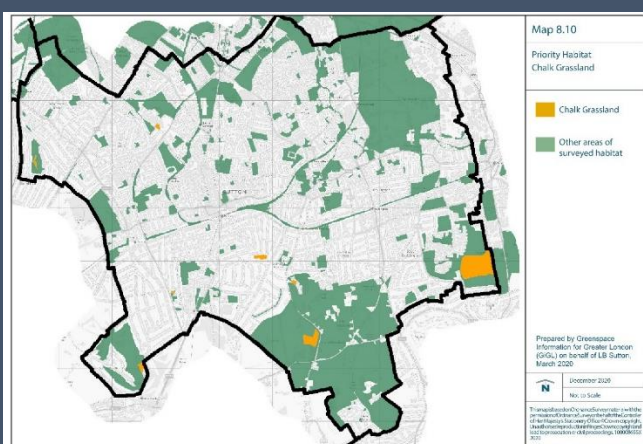
Source Green Space Information for Greater London on behalf of LB Sutton October 2023

Map 4.12: Habitat Prototype Map for LB Sutton (prepared by GiGL CIC)

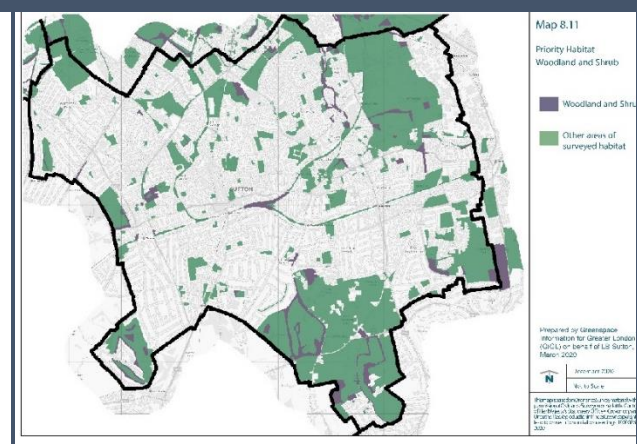


Source Green Space Information for Greater London on behalf of LB Sutton October 2023

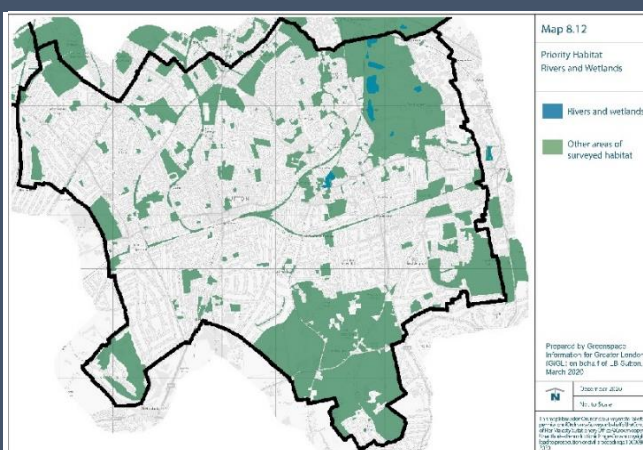
Map 4.13: Priority Habitat within LB Sutton – Chalk Grassland



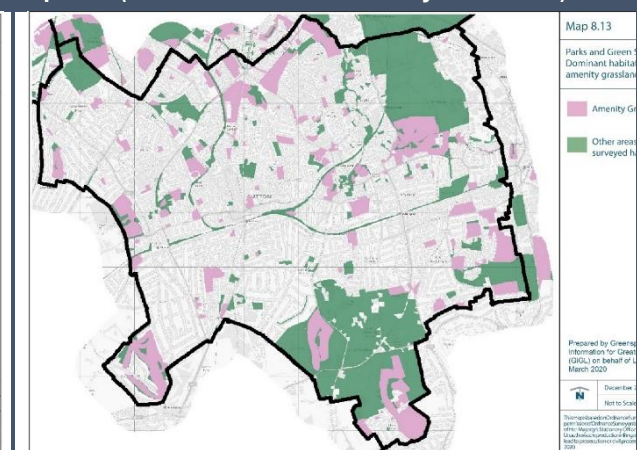
Map 4.14: Priority Habitat within LB Sutton – Woodland and Scrub



Map 4.15: Priority Habitat within LB Sutton – Rivers and Wetlands



Map 4.16: Priority Habitat in LBS– Parks and Green Spaces (Dominant Habitat: Amenity Grassland)



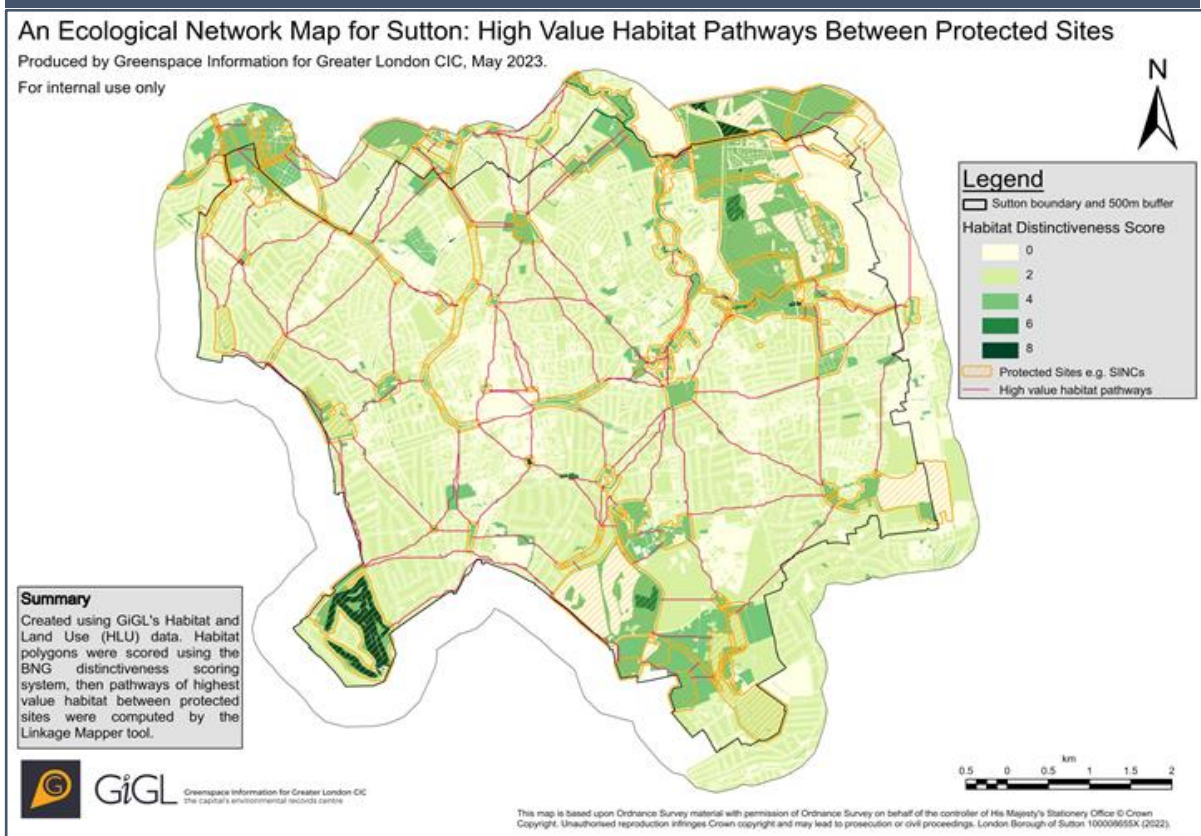
Monitoring of habitat enhancement measures in Local Plan and Biodiversity Action Plan (BAP)

Local Plan Policy 26/ BAP Target		Progress as of January 2022
WOODLAND		
Creation of 1 ha of new woodland	No new woodland in the ownership of LBS created. One area identified as a possible 'offsetting' site' has been mapped. Scrub and woodland planting continues at Beddington Farmlands, in accord with planning conditions. A detailed survey is scheduled to determine suitability of the area identified for woodland creation. Delivery dependent on funding.	
Enhancement of 2 ha woodland	Completion of infrastructure (benches, entrance signage and interpretation board) and continuation of woodland management, including additional planting and seeding. Areas for specific enhancement are being mapped at Queen Mary's Woodland and Roundshaw Woods. Delivery dependent on funding.	
CHALK GRASSLAND		
Creation 2 ha of new chalk grassland	One area of 4ha for possible creation / restoration has been identified and mapped. Whether creation or restoration depends on undertaking a detailed survey in 2021 Delivery dependent on funding.	
Enhancement of 12 ha of chalk grassland	Enhancement of the small chalk grasslands continues, with combinations of grazing . (including cattle at Cuddington Meadows), cutting, seed harvesting and overseeding.. Additional paddocks have been mapped and roughly costed. The main bulk of enhancement will need to take place at Roundshaw Downs and will rely on the extension of cattle grazing to more of the site. Delivery dependent on funding.	

Source: LBS Biodiversity Team December 2021

Ecological network mapping and habitat pathways

Map 4.17: Ecological Network Map for LB Sutton – High Value Pathways



Biodiversity Net Gain (BNG) – Background

Commentary: One of the key provisions of the Environment Act 2021 is the introduction of mandatory Biodiversity Net Gain (BNG) under which the majority of new developments must deliver at least a 10% net gain on the existing site baseline value for biodiversity, either on-site or off-site, or by buying statutory biodiversity credits as a last resort. BNG came into force from February 2024 for major developments and from April 2024 for smaller sites. Accordingly, the National Planning Policy Framework (NPPF) requires that Local Plans should promote the conservation, restoration and enhancement of priority habitats and ecological networks and pursue wider opportunities for securing measurable net gains.

The Statutory Biodiversity Metric has been developed by Natural England in order to provide ecologists, developers, planners with a means of assessing changes in biodiversity value brought about by development or changes in land management. The Government's planning practice guidance (PPG) confirms that, under the statutory framework for BNG, every grant of planning permission is deemed to have been granted subject to a 'general biodiversity gain' condition to secure the 10% objective through either on-site biodiversity gains, registered off-site biodiversity gains or statutory biodiversity credits. This condition requires developers to submit and approve a Biodiversity Gain Plan before the start of construction on site

In preparation for BNG, LB Sutton has worked with Green Space Information for Greater London (GiGL) CIC and other partners to develop a better understanding of existing habitat types and biodiversity value across the borough, in terms of the extent, distinctiveness, condition, strategic significance and biodiversity units associated with each habitat. This pilot project was undertaken for the purpose of creating a high-level baseline for the whole borough as part of the Local Plan evidence base and to inform wider discussions on how BNG should be implemented in Sutton. However, on-site habitat assessments undertaken by appropriately qualified ecologists will be necessary to generate more granular and up to date baseline information for specific sites.

Map 4.18 shows the initial results of the pilot project. Key habitats across the borough, their distinctiveness, their condition and their associated biodiversity units are set out in the Table. Total biodiversity units for the 4,461 ha surveyed are calculated as 7,556 as of October 2023. It should be noted that default values were used for the 'condition' and 'strategic significance' scores after consultation with our contacts in the LPA. More accurate condition scoring will be achievable once the appropriate condition assessments have been performed for specific areas. Similarly, specific strategic significance scores can be added for areas once these have been defined, either by LB Sutton or once London's Local Nature Recovery Strategy has been published.'

It is therefore expected that this baseline information will change over time as new data becomes available.

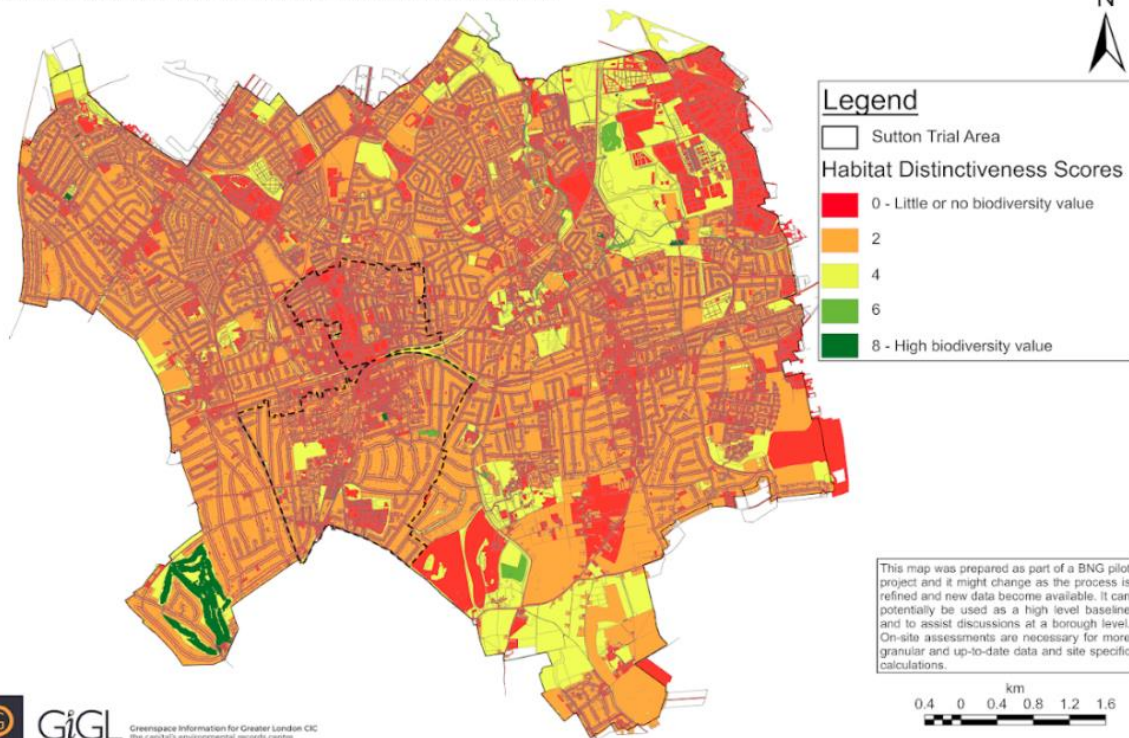
Biodiversity net gain (BNG) – Mapping habitat distinctiveness scores and biodiversity value

Commentary: The Council is currently trialling an automated satellite-based system which can remotely map land coverage and habitats across the borough and calculate a baseline biodiversity value for any chosen development site and for wider areas. The system is designed to be used by developers and their ecologists in preparing BNG plans and to enable the delivery of BNG targets to be monitored over a period of 30 years. As of April 2024, the Intelligent Sustainability Management System (ISMS) created by Ai-Dash Ltd has analysed habitat cover and biodiversity value for two trial areas within the borough, covering a total area of 330.8 ha. Baseline biodiversity values generated by the Ai-Dash system may be used as the basis for setting long-term Local Plan targets for achieving an uplift in BNG for specific sites and for wider areas..

Map 4.18: BNG Pilot Project - Habitat distinctiveness and biodiversity value

Sutton BNG Pilot Project: Whole Borough with Ground Truthing (Distinctiveness)

Produced by Greenspace Information for Greater London CIC on behalf of LB Sutton, Oct 2023



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Habitat Type	ha	%	Distinctiveness	Cond	Strategic Significance	Biodiversity Units
Arable and horticulture	45.4	1.0%	2	2	1	181.15
Broadleaf mixed and yew woodland	160.9	3.6%	4	2	1	1,286.27
Built linear features	564.0	0%	0	2	1	0.00
Built-up areas and gardens	2,469.7	55.4%	0	2	1	0.00
Coniferous woodland	1.21	0.03%	2	2	1	4.87
Dense scrub	26.4	0.6%	4	2	1	211.25
Fen marsh and swamp	0.32	0.01%	8	2	1	4.69
Grassland	84.5	1.9%	2	2	1	338.03
Intensive orchards	0.1	0%	2	2	1	0.36
Lowland calcareous grassld	6.5	0.2%	6	2	1	78.28
Lowland dry acid grassland	34.5	0.8%	8	2	1	552.17
Lowland meadows	2.0	0.04%	8	2	1	31.66
Modified grassland	338.7	7.6%	2	2	1	1354.97
Untranslatable habitat	126.7	2.8%	0	2	1	0.00
Unknown terrestrial veg	171.5	3.8%	0	2	1	0.00
Other lowland deciduous woodland	1.5	0.03	6	2	1	18.47
Other neutral grassland	375.1	8.4%	4	2	1	3000.91
Other woodland; mixed	20.6	0.5%	4	2	1	164.85
Rivers and streams	15.6	0.4%	6	2	1	187.71
Standing open water/stream	17.6	0.4%	4	2	1	140.78
Total	4,461	100%				7556.42

Source: Greenspace Information for Greater London (GiGL) CIC on behalf of the Council (October 2023)

Map 4.19: Habitat areas and biodiversity units for Sutton Town Centre and Beddington Park based on ISMS trial (with and without tree locations)



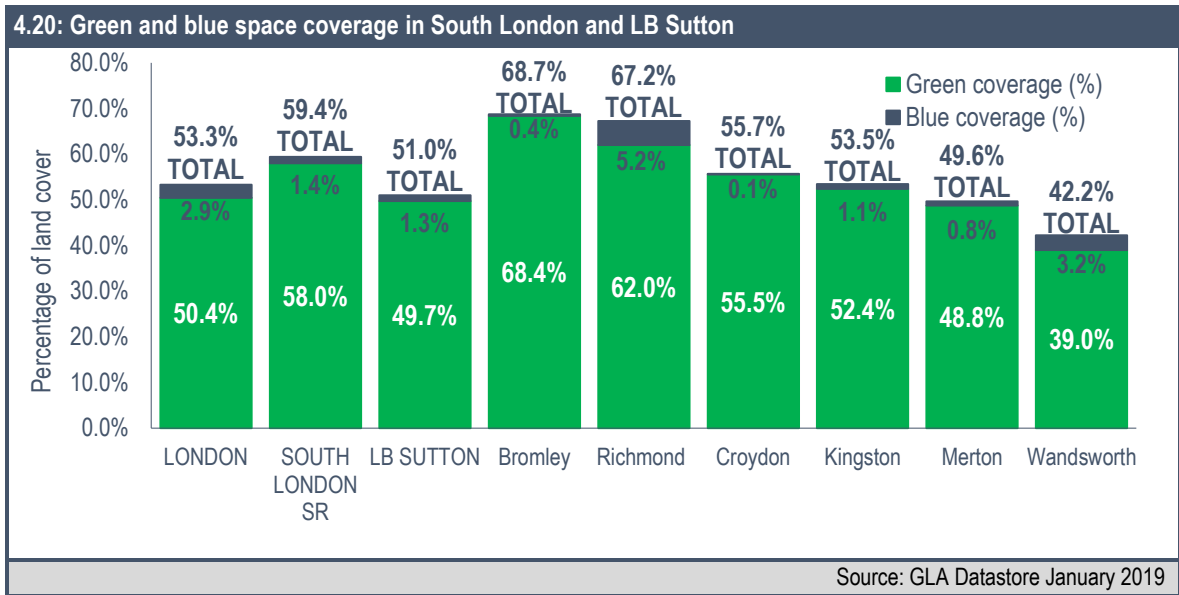
Source Ai-Dash Intelligent Sustainability Management System (ISMS), April 2024:

Habitat Type	Sutton Town Centre (boundary)	Beddington Park
Habitat area (ha)	70.57	283.76
Biodiversity units	55.37	2.01K
Biodiversity Units per ha	0.78	7.12
Hedgerow length (km)	4.63	6.47
Hedgerow biodiversity unit	15.32	25.27
Hedgerow biodiversity units per km	3.31	3.91
Watercourse length (km)	0	10.51
Watercourse biodiversity units	0	80.1
Watercourse biodiversity units /km	0	7.62
Total biodiversity units	4,461.5	100%

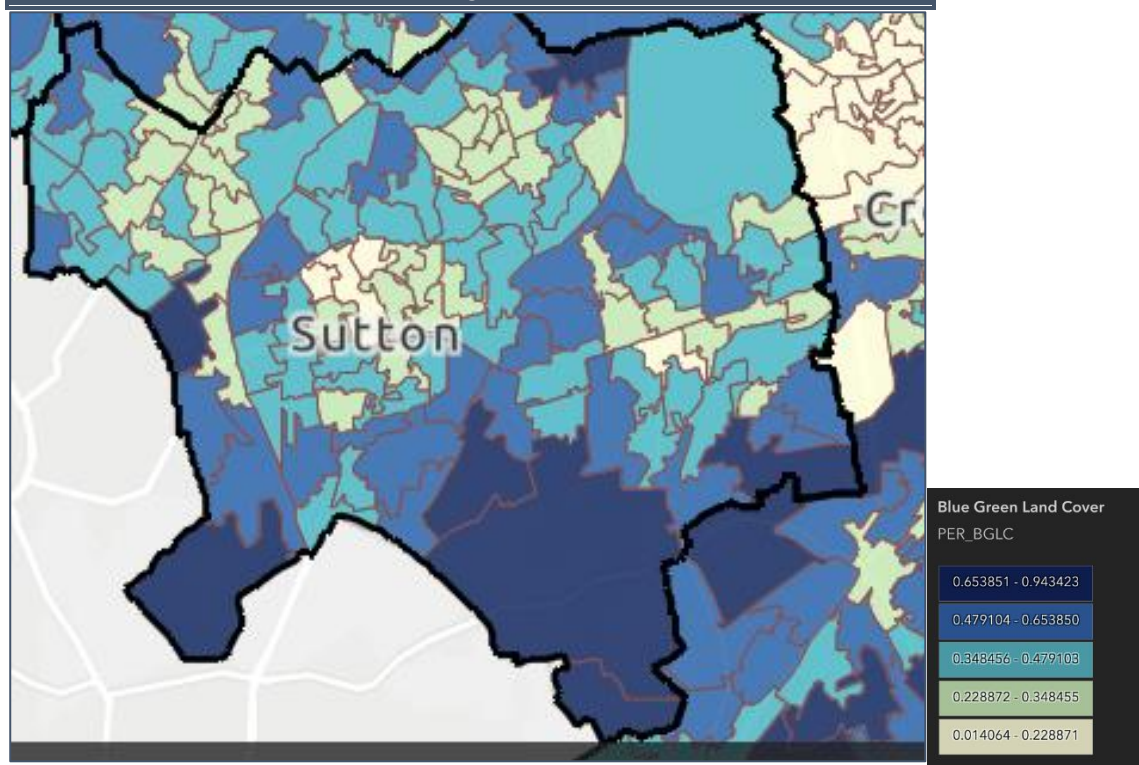
Source Ai-Dash Intelligent Sustainability Management System (ISMS), April 2024:

GREEN INFRASTRUCTURE AND CLIMATE VULNERABILITY MAPPING⁶¹

Green and blue space coverage



Map 4.20: Green and blue space coverage within LB Sutton



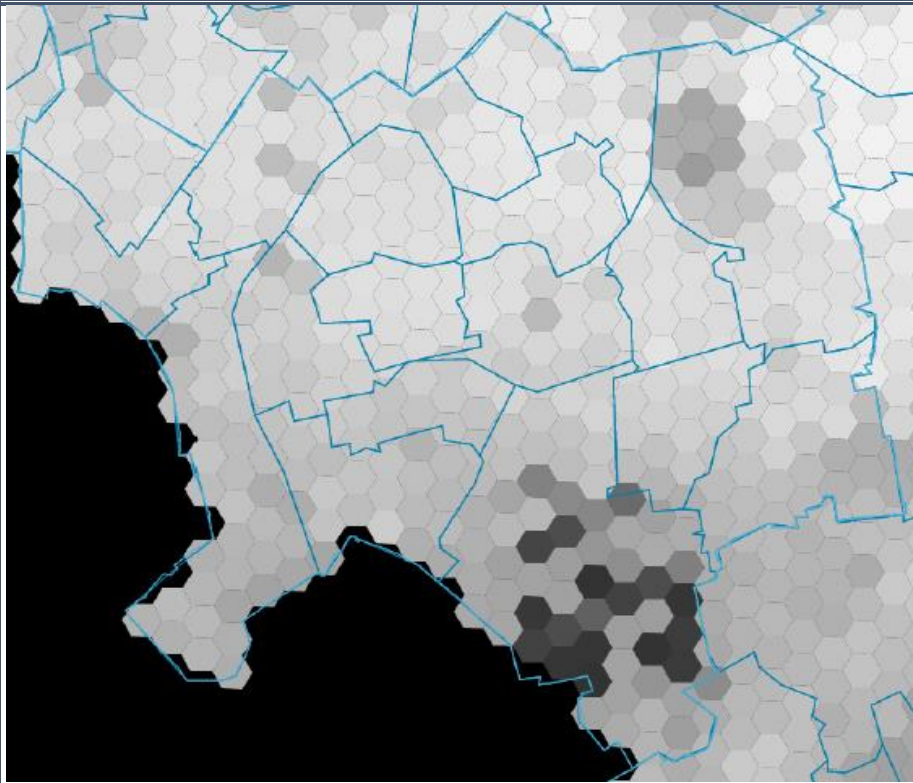
Source: GLA climate risk mapping 2022

Commentary: Blue and green space cover, including parks, green spaces, trees, rivers, wetlands, green roofs and back gardens can reduce the impacts of climate change, improve air and water quality, promote healthier lifestyles, reduce car dependency and enhance biodiversity value. Map 4.20 shows blue and green cover across the borough based on GLA climate mapping total green and blue space coverage in the London Borough of Sutton was 50.94% against an average of 46.91% for London boroughs.

⁶¹ the GLA's 2018 dataset on green and blue space cover is available on the London Datastore at <https://data.london.gov.uk/dataset/green-and-blue-cover>

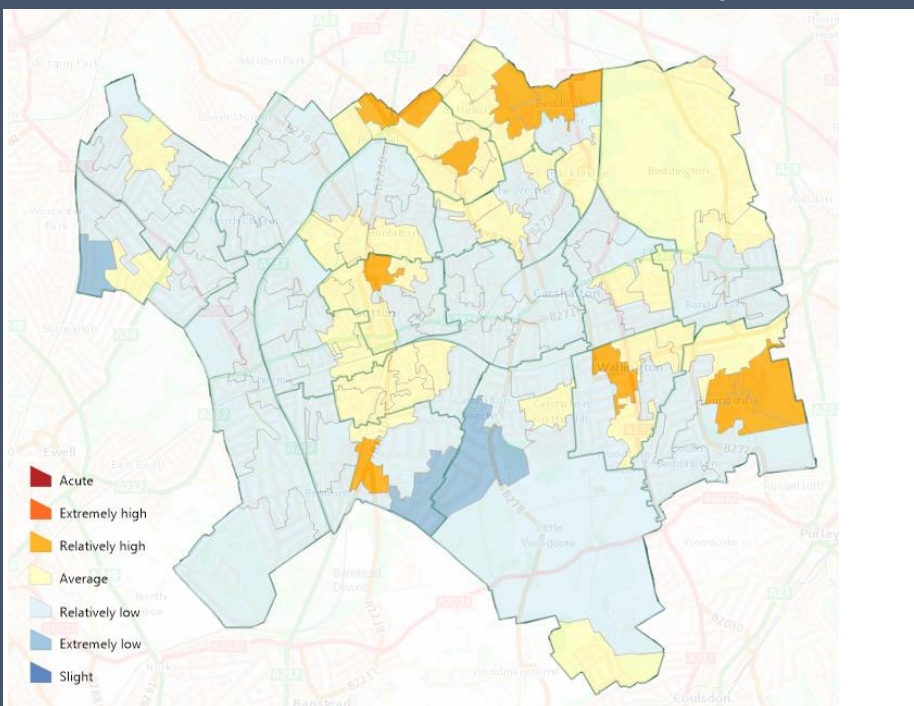
Climate exposure and vulnerability mapping

Map 4.21: Urban heat island (UHI) – location of medium and high risk areas during a summer heatwave⁶²



Source: GLA Green Infrastructure Focus Map October 2020

Map 4.22: Urban heat island (UHI) – location of vulnerable neighbourhoods⁶³



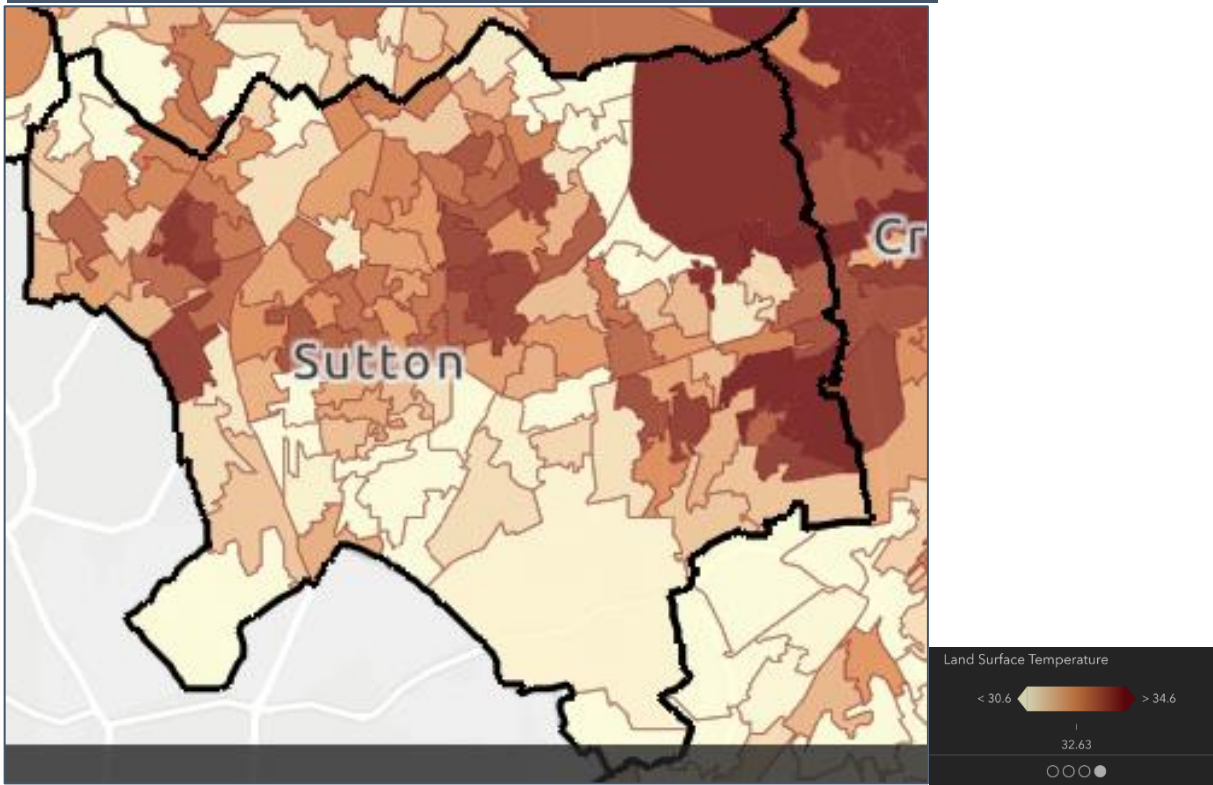
Source: Climate Just website October 2020

⁶² based on modelled mean nighttime temperature differential between the rural low of 13.06 degree Celcius and urban areas for an average summer (2011) as modelled by VITO using the UrbClim model

⁶³ Climate Just website

Commentary: Arising from a partnership project between the GLA and Bloomberg Associates, a series of London-wide maps were produced in March 2021, in order to identify areas that are most exposed to climate impacts, such as heat risk and flooding, and overlay these with areas with high concentrations of vulnerable populations. These climate risk maps were subsequently updated in 2022, in order to include additional data layers at a finer geographic scale (LSOA boundaries). The land surface temperature maps presented are taken from a report entitled ‘London Climate Risk - A Spatial Analysis of Climate Risk Across Greater London (GLA, Bloomberg, 2022)’⁶⁴

Map 4.23: Land surface temperature map for LB Sutton

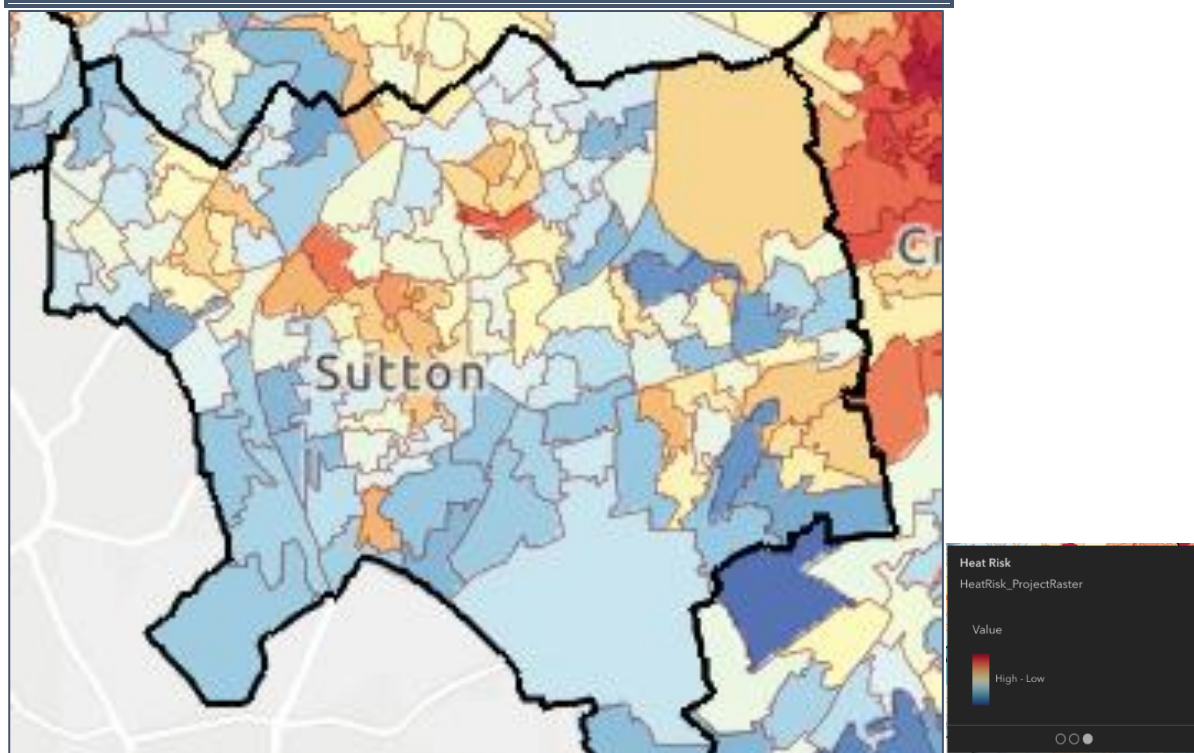


Source: GLA climate exposure mapping 2022

Commentary: Summer heatwaves and the UHI effect can have a direct impact on people’s health and wellbeing. Department of Health research suggests that over 7,000 people could die prematurely from the effects of heatwaves per year by the 2050s. Elevated urban temperatures can also impact local air quality and energy demand, with implications for net zero carbon targets, public health and climate resilience. Map 4.23 shows average land surface temperatures across the borough from 2016-20 (summertime/ daytime) down to Lower Level Super Output Areas (LSOAs) based on the outcome of GLA climate exposure mapping.

⁶⁴ the report is available at <https://data.london.gov.uk/dataset/climate-risk-mapping>

Map 4.24: Heat risk and vulnerability map for LB Sutton



Source: GLA climate exposure mapping 2022

Commentary: Map 4.24 shows heat risk across the borough based on GLA climate risk mapping. This uses a composite score based on the proportion of the population under 5 and over 75; proficiency in English; income deprivation; socially rented housing; black and ethnic minority (BAME) groups; average land surface temperature; air pollution (PM2.5 and NO₂); tree canopy cover; and areas of deficiency in access to public open space.

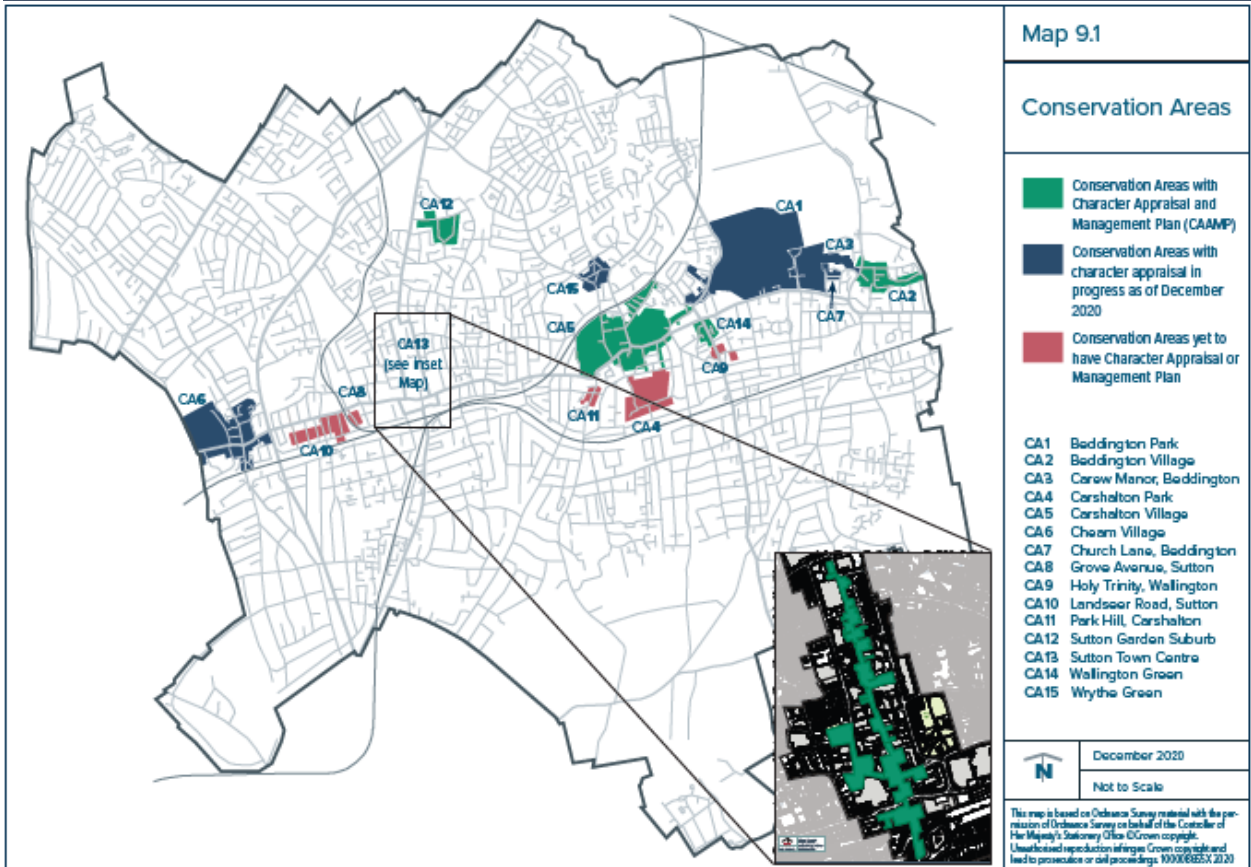
BUILT AND HISTORIC ENVIRONMENT

Conservation Areas

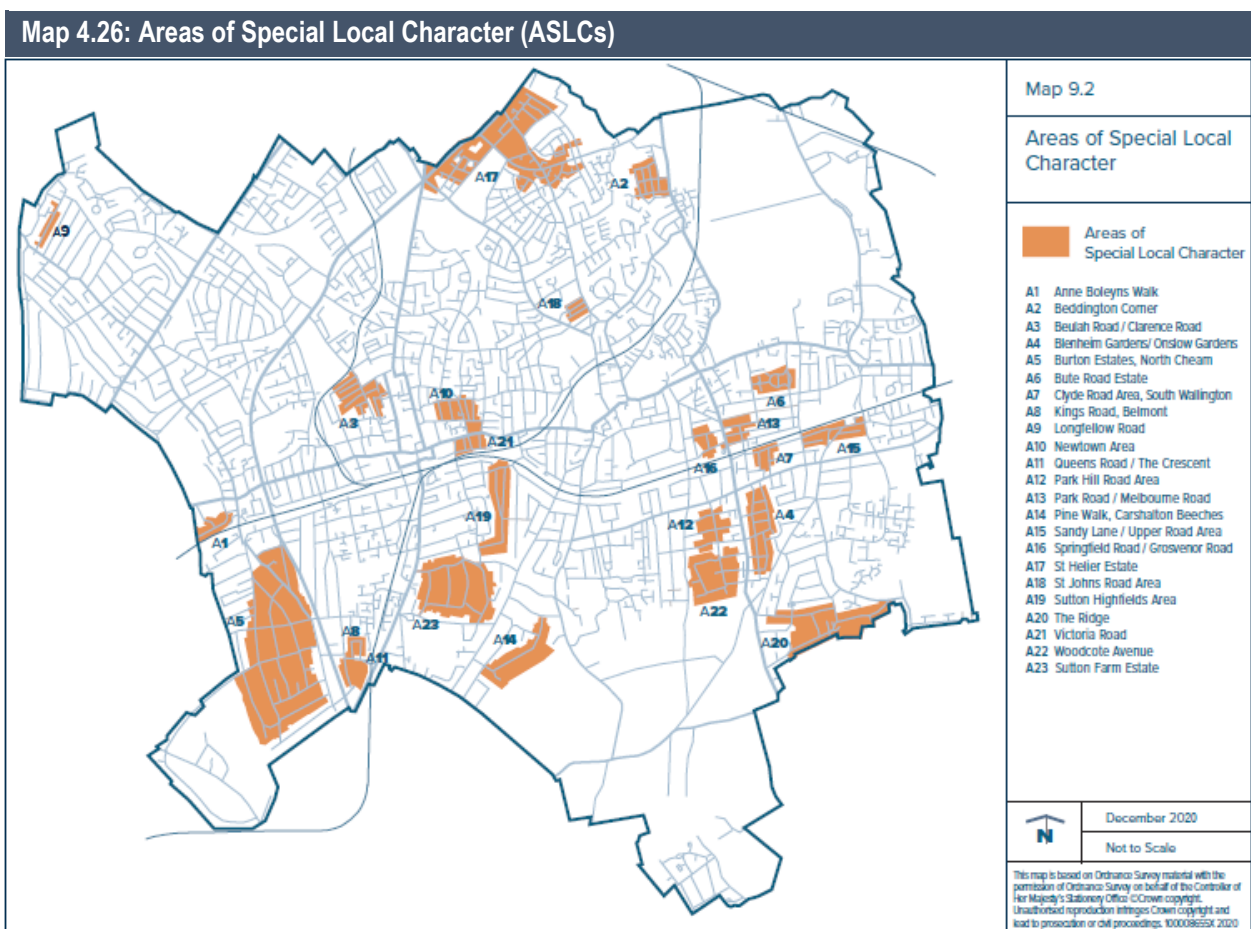
No.	Conservation Area	Area (ha)	Designated (amended)	CAAMP Approved?
1.	Beddington Park Conservation Area	58.6	1970 (1977)	YES
2.	Beddington Village Conservation Area	8.5	1994 (2018)	YES
3.	Carew Manor Conservation Area	15.1	1970 (1977)	YES
4.	Carshalton Park Conservation Area	14.2	1993	n/a
5.	Carshalton Village Conservation Area	44.6	1968 (1993)	YES
6.	Cheam Village Conservation Area	29.4	1970 (1994, 2018)	YES
7.	Church Lane Conservation Area	1.4	1994	YES
8.	Grove Avenue Conservation Area	1.4	1992	n/a
9.	Holy Trinity Conservation Area	1.4	1997	n/a
10.	Landseer Road Conservation Area	8.9	1992	n/a
11.	Park Hill Conservation Area	1.8	1993	n/a
12.	Sutton Gden Suburb Conservation Area	8.4	1989	YES
13.	Sutton Town Centre Conservation Area ⁶⁵ ()	6.5	2011 (2019)	YES
14.	Wallington Green Conservation Area	3.7	1970 (1977)	YES
15.	Wrythe Green Conservation Area	5.1	1969 (1994)	YES

⁶⁵ formerly Sutton High Street Crossroads CA (the CA boundaries have now been significantly extended)

Map 4.25 Conservation Areas



Areas of Special Local Character (ASLCs)



Statutory Listed Buildings and Structures

Indicator	April 2018	April 2019	April 2020	April 2021	Change 2020 to 2021
Number of statutory listed buildings & structures (Grade I, Grade II or Grade II*) ⁶⁶	188	188	209 ⁶⁷	209	0

Listed Buildings or Structures 'At Risk'

Indicator	April 2020	April 2021	Net change 2020-2021
Number of Listed Buildings or Structures 'At Risk' ⁶⁸			
<ul style="list-style-type: none"> • Parish Church of St Mary the Virgin, Church Road, Beddington (Grade II*) • Churchyard walls, Church Road, Beddington (1065671) (Grade II) • Orangery wall at Beddington Place, Church Road, Beddington (Grade II) • Garden walls at Beddington Place (Carew Manor School) (Grade II) • Boundary walls to Beddington Place Church Lane, Beddington (Grade II) • Grotto in Carshalton Park, Ruskin Road (Grade II) 	6	6	0

Locally Listed Buildings

Indicator	April 2020	April 2021	Net change 2020 to 2021
Number of locally listed buildings & structures (including locally listed buildings upgraded to statutory listed buildings)	104	104	0

Archaeological Priority Areas and Scheduled Ancient Monuments

Indicator	April 2020	April 2021	Net change 2020 to 2021
Number of Archaeological Priority Areas	21	21	0
Scheduled Ancient Monuments	6	6	0

Characterisation Assessment of the Borough

Commentary: An updated Character Study of the Borough has been prepared during 2022-23 as part of the evidence gathering stage of the current Local Plan review in order to provide a comprehensive assessment of the diversity, quality and sensitivity to change of the borough's townscape and landscape, including its suburban residential heartlands. This updates the previous Characterisation Assessment⁶⁹ of the borough prepared in 2008 in order to inform the policies of the former Sutton Core Planning Strategy and Site Development Policies DPD) adopted in 2012.

As before, the Character Study identifies a range of very high quality residential areas. The 'heartlands' to the south of the borough are characterised by very low density, predominantly detached/semi-detached two storey houses set in well landscaped plots and in leafy, tree-lined roads. However, the report also identified some residential estates that are bland and lack identity and some commercial areas that need significant enhancement to help them achieve their potential.

Maps 4.27 to 4.30 illustrate the main outputs of the updated Character Study at the Borough-wide level.

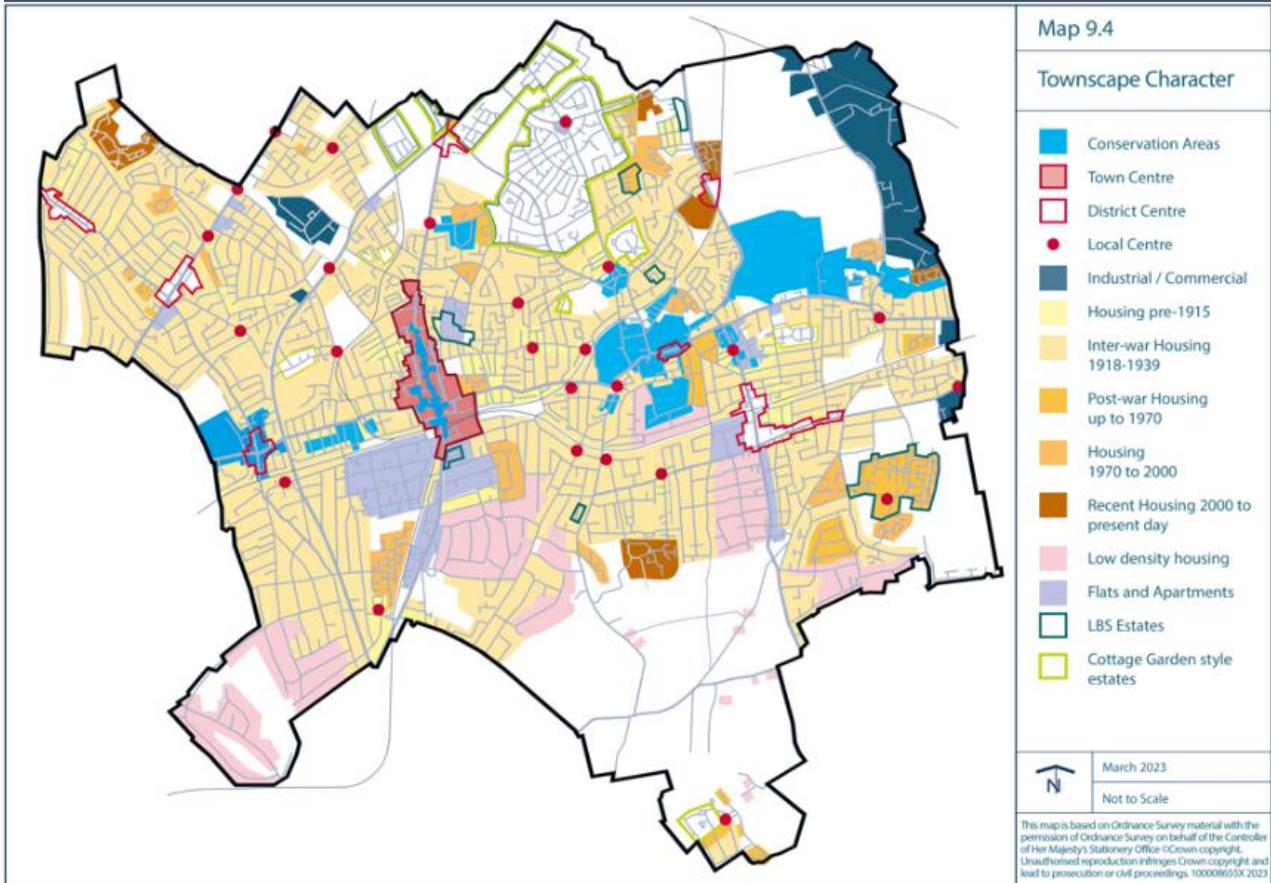
⁶⁶ Statutory listed buildings and structures are available on the Historic England website at <https://historicengland.org.uk/listing/the-list/>

⁶⁷ Taking into account historical discrepancies (e.g. double counting) for 4 sites

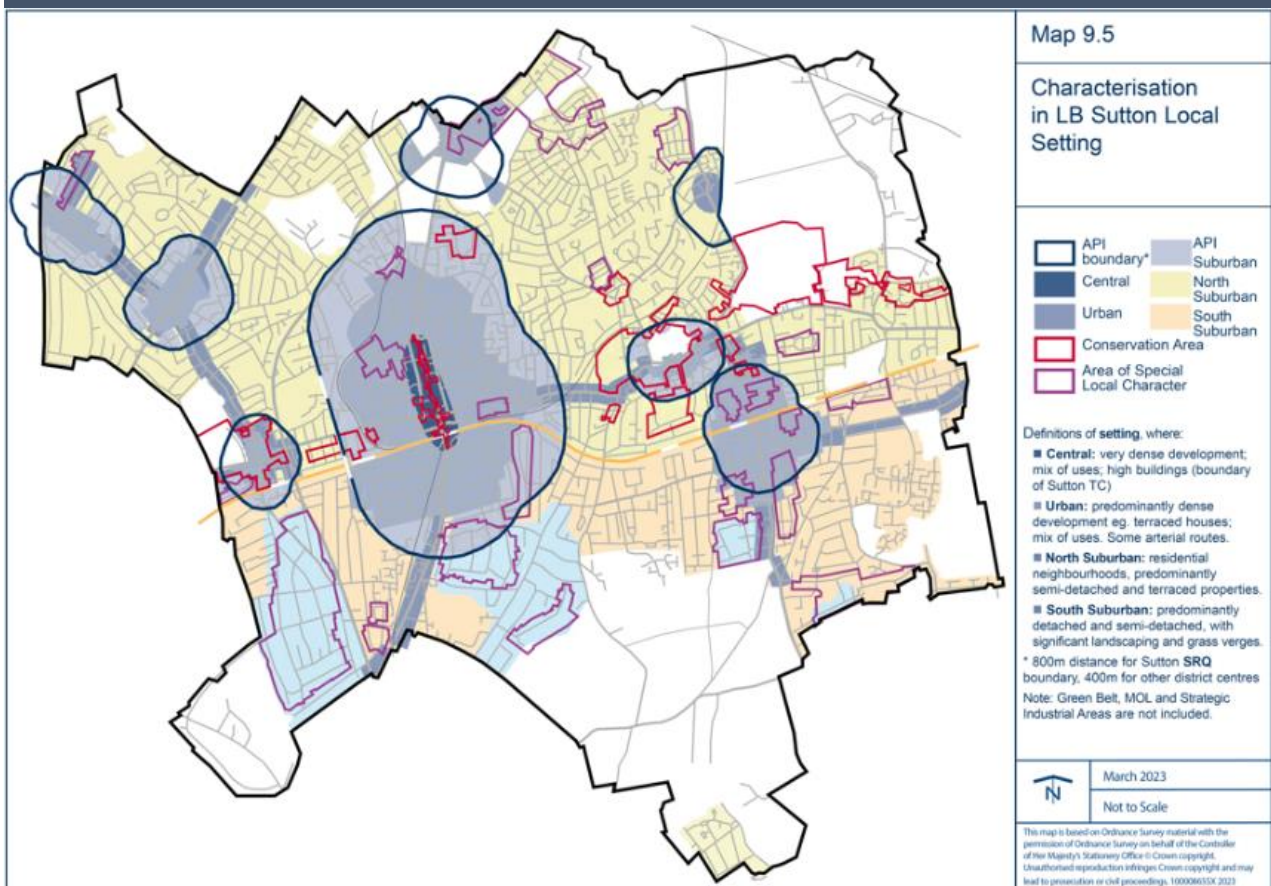
⁶⁸ English Heritage's 'Buildings at Risk' Register is available at <https://historicengland.org.uk/>

⁶⁹ Understanding Sutton's Local Distinctiveness: Characterisation Report of Studies' (LBS, November 2008)

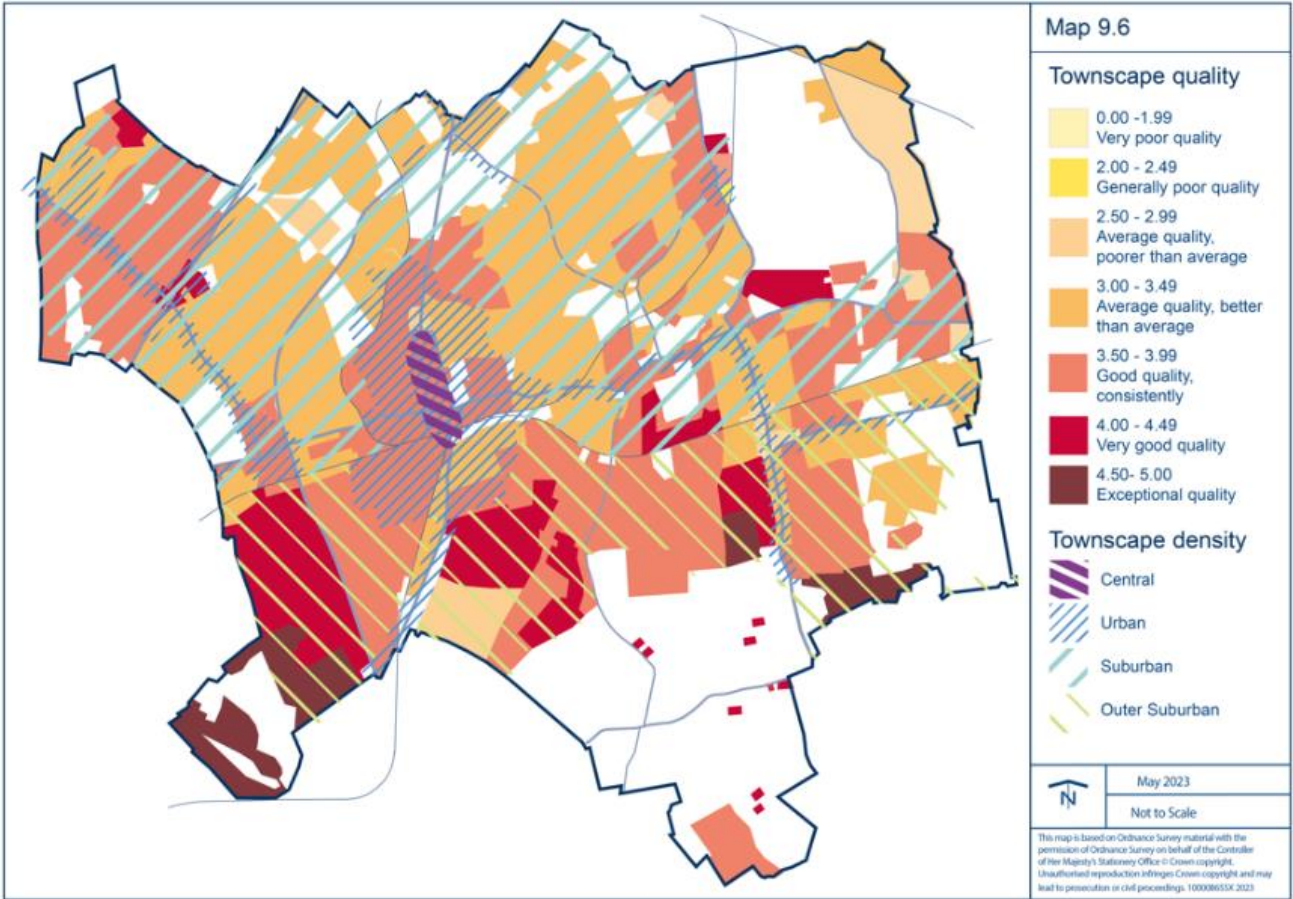
Map 4.27: Borough Character Study 2023 - Townscape Character Map



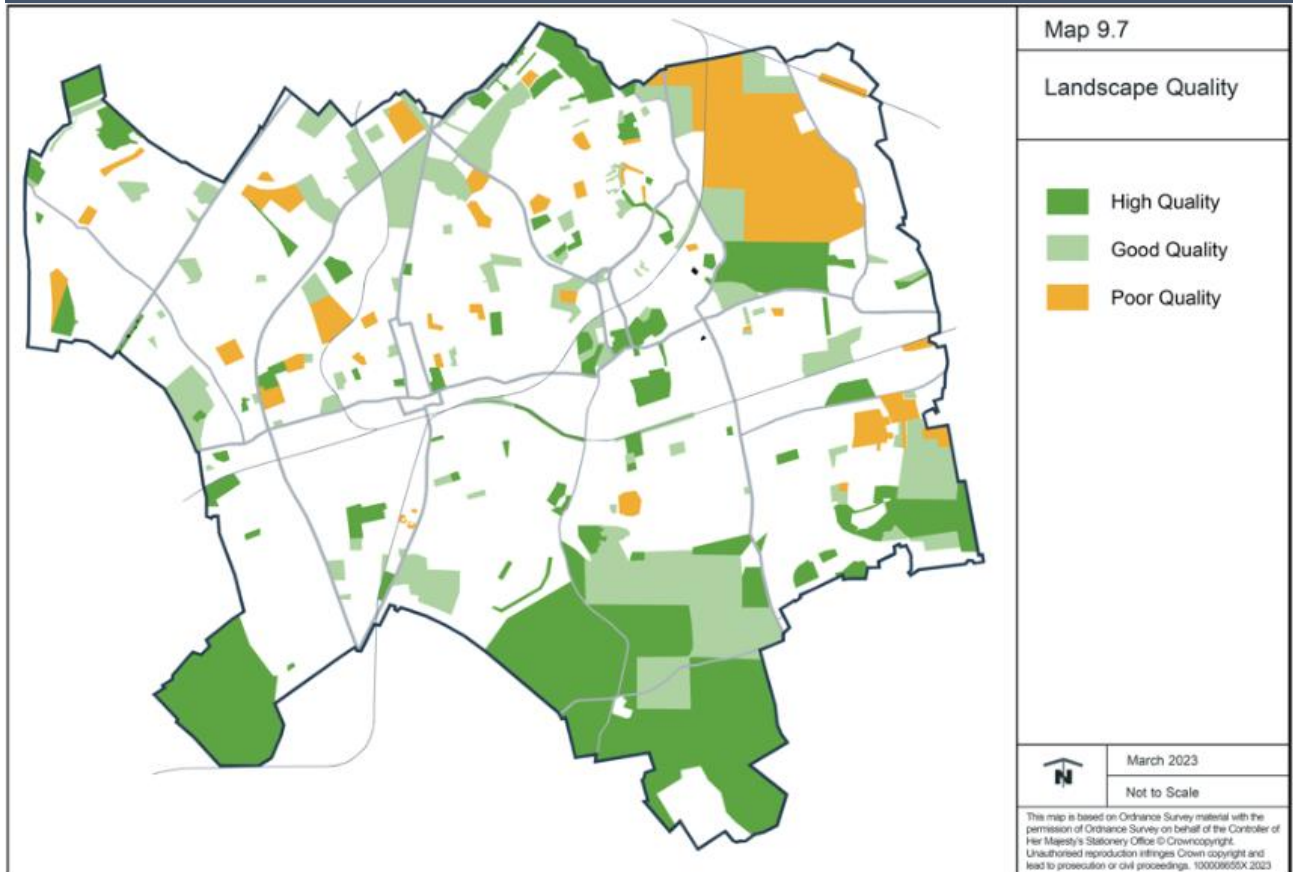
Map 4.28: Borough Character Study 2023 - Local Settings



Map 4.29: Borough Character Study 2023 – Townscape quality and density



Map 4.30: Borough Character Study 2023 – Landscape quality



COMMUNITY AND LEISURE FACILITIES

Secondary Schools⁷⁰

Secondary School	Number on School Roll (NOR)			School Capacity 2021-22	Excess of Capacity 2021-22
	2020-21	2021-22	Annual Change 2020-21 to 2021-22		
Carshalton Boys Sports College	1,471	1,500	+29 (+2.0%)	1,347	-153
Carshalton High School for Girls	1,403	1,426	+23 (+1.6%)	1,480	+54
Cheam High School	2,068	2,128	+60 (+2.9%)	2,080	-48
Glenthorne High School	1,654	1,691	+37 (+2.2%)	1,558	-133
Greenshaw High School	1,910	1,911	+1 (+0.1%)	1,970	+59
Harris Academy Sutton	654	865	+211(+32.3%)	1,275	+410
Nonsuch High School for Girls(G)	1,503	1,511	+8 (+0.5%)	1,500	-11
Oaks Park ⁷¹ High School	1,139	1,165	+26 (+2.3%)	1,315	+150
Overton Grange School	1,203	1,262	+59 (+4.9%)	1,480	+218
St Philomena's High School for Girls	1,454	1,477	+23 (+1.6%)	1,549	+72
Sutton Grammar School (G)	1,022	1,034	+12 (+1.2%)	935	-99
The John Fisher School	1,160	1,190	+30 (+2.6%)	1,265	+75
Wallington County Grammar (G)	1,112	1,101	-11 (+-1.0%)	1,125	+24
Wallington High School for Girls (G)	1,523	1,523	0 (+0.0%)	1,470	-53
Wilson's School	1,290	1,297	+7 (+0.5%)	1,327	+30
TOTAL	20,566	21,081	+515 (+2.5%)	21,676	+595

Projected Need for Additional Secondary School Places (at Year 7)

Year	2021-22	2022-23	2023-24	2024-25	2025-26	2026-27	2027-28	2028-29	2029-30	2030-31
Need for Places (Yr 7)	3,449	3,461	3,523	3,416	3,335	3,432	3,416	3,343	3,210	3,208
Admission No. (r 7)	3,413	3,290	3,290	3,290	3,290	3,290	3,290	3,290	3,290	3,290
Shortfall	-36	-171	-233	-126	-45	-142	-126	-53	80	82

Source: LBS January 2021

Schools agreeing to provide additional places and seeking capital investment	Number of Extra Places (11-16)	Implementation
Carshalton High School for Girls	150 (30 each year)	2022-23 to 2027-28 inclusive
Glenthorne	86 (43 each year)	2022-23 and 2023-24
Oaks Park High School	250 (50 each year)	2022-23 to 2027-28 inclusive
Overton Grange	30 ⁷²	2023-24
St Philomenas Catholic School for Girls	30	2023-24
Total	546 additional places	

Source: Pupil Based Commissioning Report to LBS People Committee 9 December 2021

Primary School Rolls and Capacity

Primary School	Number on School Roll (NOR)			School Capacity 2021-22	Excess of Capacity 2021-22
	2020-21	2021-22	Annual Change 2020-21 to 2021-22		
Abbey Primary School	436	438	+2 (+0.5%)	390	-48
All Saints Benhilton CofE	458	458	0	420	-38
All Saints Carshalton CofE Primary	447	436	-11 (-2.5%)	420	-16
Avenue Primary Academy	969	992	+23 (+2.4%)	930	-62
Bandon Hill Primary School	1,295	1,259	-36 (-2.8%)	1,242	-17
Barrow Hedges Primary School	664	673	+9 (+1.4%)	630	-43

⁷⁰ this includes community, foundation, voluntary and middle schools as deemed and academies/free schools. Special Educational Needs (SEN) schools are excluded

⁷¹ formerly Stanley Park High School

⁷² the additional 30 places in 2023-24 for Overton Grange is over and above the 30 offered in each of 2022-23 to 2027-28 to revert to the school's 'as built' capacity

Primary School	Number on School Roll (NOR)			School Capacity 2021-22	Excess of Capacity 2021-22
	2020-21	2021-22	Annual Change 2020-21 to 2021-22		
Beddington Infants' School	298	300	+2 (+0.7%)	217	-83
Beddington Park Primary School	394	349	-45 (-11.4%)	420	71
Brookfield Primary Academy	435	445	+10 (+2.3%)	420	-25
Cheam Common Infants' School	418	420	+2 (+0.5%)	330	-90
Cheam Common Junior Academy	482	490	+8 (+1.7%)	450	-40
Cheam Fields Primary Academy	477	488	+11 (+2.3%)	438	-50
Cheam Park Farm Primary Academy ⁷³	890	884	-6 (-0.7%)	840	-44
Culvers House Primary School	425	443	+18 (+4.2%)	420	-23
Devonshire Primary School	672	663	-9 (-1.3%)	660	-3
Dorchester Primary School	586	566	-20 (-3.4%)	630	64
Foresters Primary School	240	234	-6 (-2.5%)	175	-59
Green Wrythe Primary School	272	284	+12 (+4.4%)	210	-74
Hackbridge Primary School	713	753	+40 (+5.6%)	620	-133
Harris Junior Academy Carshalton	382	387	+5 (+1.3%)	390	3
High View Primary School	457	450	-7 (-1.5%)	396	-54
Holy Trinity CofE Junior School	349	338	-11 (-3.2%)	360	22
Manor Park Primary School	694	692	-2 (-0.3%)	630	-62
Muschamp Primary	623	617	-6 (-1.0%)	574	-43
Nonsuch Primary School	237	228	-9 (-3.8%)	192	-36
Robin Hood Infants' School	269	270	+1 (+0.4%)	265	-5
Robin Hood Junior School	357	356	-1 (-0.3%)	346	-10
Rushy Meadow Primary Academy	335	351	+16 (+4.8%)	420	69
St Cecilia's Catholic Primary School	469	460	-9 (-1.9%)	417	-43
St Dunstan's Cheam CofE Primary	443	457	+150 (+48.9%)	419	-38
St Elphege's RC Infants'	321	320	-123 (-27.8%)	270	-50
St Elphege's RC Junior	382	382	+21 (+5.8%)	360	-22
St Mary's RC Infants School	307	293	-89 (-23.3%)	270	-23
St Mary's RC Junior School	361	359	+38 (+11.8%)	359	0
Stanley Park Infants School	295	290	-5 (-1.7%)	270	-20
Stanley Park Junior School	368	366	-2 (-0.5%)	336	-30
Tweeddale Primary School	400	412	+12 (+3.0%)	420	8
Victor Seymour Infants'	321	321	0	270	-51
Wallington Primary Academy	242	198	-44 (-18.2%)	420	222
Westbourne Primary School	648	642	-6 (-0.9%)	630	-12
TOTAL	18,831	18,764	-67 (-7.1%)	17,876	-888

Source: LBS Pupil Based Commissioning Team April 2022

Projected Need for Additional Primary School Places 2019-20 to 2024-25

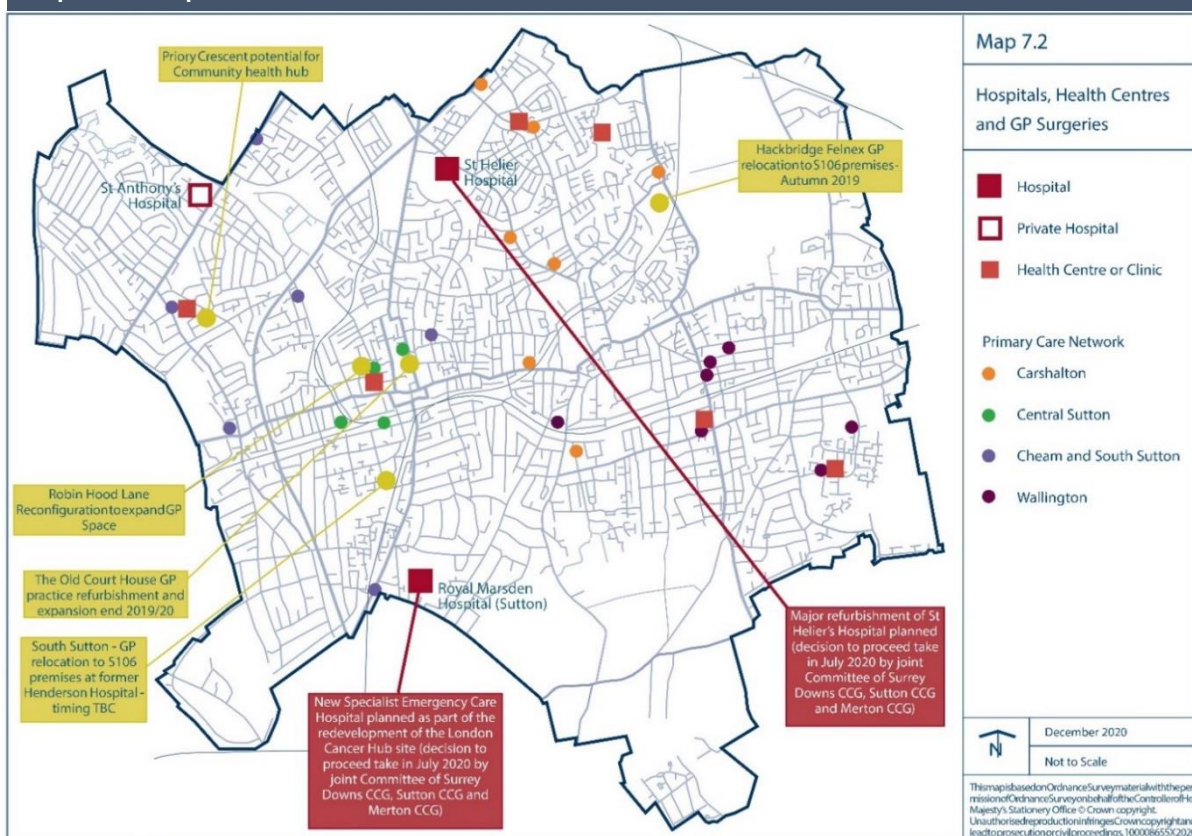
Year	2019-20	2020-21	2021-22	2022-23	2023-24	2024-25
Projected Need for Reception Places	2,533	2,511	2,462	2,309	2,308	2,260
Projected Need with 5% unfilled	2,660	2,637	2,585	2,425	2,424	2,373
Planned Provision of Reception Places	2,602	2,602	2,602	2,602	2,602	2,602

Source: LBS Pupil Based Commissioning Team April 2022

⁷³ previously Cheam Park Farm Infants and Cheam Park Farm Junior schools

Hospital provision

Map 4.31: Hospitals and Health Centres



Source: Sutton Clinical Commissioning Group (CCG) Estates Strategy for LB Sutton (Dec 2020) (except for Spire)

Public Sports and Leisure Facilities

Facility	Facilities	Improvements
MAIN LEISURE CENTRES		
Westcroft Leisure Centre, Carshalton	Two swimming pools, a sports hall, group exercise studios, a gym, crèche, meeting facilities and café. ('Everyone Active' brand)	Major upgrade 2013
Cheam Leisure Centre, North Cheam,	Gym, swimming pool, group exercise facilities, health suite, sports hall, squash courts and meeting room ('Everyone Active' brand)	Major upgrade 2015
Phoenix Leisure Centre, Wallington,	Gym, sports hall, dance studio, group exercise, community hall, café and soft play. The sports hall provides a range of sports including football, short tennis and badminton (SLM Ltd under 'Everyone Active' brand)	Major upgrade completed 2021 (£1m)
David Weir Leisure Centre, , Carshalton,	Indoor and outdoor sports facilities (SLM Ltd under 'Everyone Active' brand)	Major upgrade, done (£1m)
Sutton Life Centre	The Life Centre Outdoor climbing wall and ball sports area (Sport England)	n/a
THEATRES		
Secombe Theatre, Sutton (Site Allocation STC10)	The Sutton Theatres Trust went into administration in 2016. The Secombe Theatre is safeguarded for a new secondary school in the Local Plan in the event that the site is unable to continue in its current use as a theatre	Loss of theatre
Charles Cryer Theatre, Carshalton (Site Allocation S27)	The Charles Cryer Theatre closed after the Sutton Theatres Trust went into administration in 2016. In 2018, the council granted a 25 year lease to Cryer Arts, a start-up intending to use the premises for a range of events, including music and theatre. The theatre reopened in 2019	Reconfiguration accommodating Cryer Arts – from 2019-20

CLIMATE CHANGE

Climate change trends and projections

UK Climate Trends

The 8th annual State of the UK Climate 2021 Report⁷⁴ (published on 28 July 2022) concluded that.

- overall, UK temperature and sunshine for 2021 were near average and rainfall slightly below.
- the UK's climate is changing, with recent decades warmer, wetter and sunnier than the 20th century.
- the UK has warmed at a broadly consistent but slightly higher rate than the observed change in global mean temperature.

Land temperature

- 2021 was 0.1°C warmer than the 1991–2020 average, and 18th warmest in the UK series from 1884. It was warmer than all but one year in this series prior to 1990.
- Winter and spring were colder than the 1991–2020 average. However, 2021 included the UK's ninth warmest summer and equal-third warmest autumn on record in series from 1884.
- All of the top ten warmest years for the UK in the series from 1884 have occurred this century.
- The most recent decade (2012–2021) has been on average 0.2°C warmer than the 1991–2020 average and 1.0°C warmer than 1961–1990.
- The 21st century so far has been warmer than any period of equivalent length from the last three centuries as shown by the Central England temperature series.

Precipitation

- 2021 rainfall was 95% of the 1991–2020 average and 102% of the 1961–1990 average.
- 2021 included the UK's fifth driest April and second wettest May in monthly series from 1836.
- Five of the ten wettest years for the UK in a series from 1836 have occurred this century.
- Since 2009, the UK has had its wettest February, April, June, November and December on record in monthly series from 1836—five of 12 months—as well as its wettest winter.
- The most recent decade (2012–2021) has been on average 2% wetter than 1991–2020 and 10% wetter than 1961–1990 for the UK overall.
- For the most recent decade (2012–2021) UK summers have been on average 6% wetter than 1991–2020 and 15% wetter than 1961–1990. UK winters have been 10%/26% wetter.

Sea-level rise

- The rate of sea-level rise in the UK is increasing, with selected locations recording a range from 3.0 ± 0.9 to 5.2 ± 0.9 mm·year⁻¹ over the past 30 years, compared to the 1.5 ± 0.1 mm·year since 1900s.
- For the 20th century the rate of sea-level rise around the UK is close to the estimate of the global sea-level rise.
- Storm surges of over 1.5 m were seen during Storm Arwen.

Source: 8th Annual State of the UK Climate Report for 2021 (Met Office, July 2022)

⁷⁴ the Met Office's Annual State of the UK Climate Report provides an up-to-date assessment of UK climate trends, variations and extremes based on the latest available climate quality observational datasets – see <https://www.metoffice.gov.uk/research/climate/maps-and-data/about/state-of-climate>

UK Climate Projections 2018 (UKCP18)

The latest UK Climate Projections 2018 (UKCP18)⁷⁵, published by the Met Office in November 2018, indicate that:

- by 2070, in the high emission scenario⁷⁶, average warming across the UK is projected to range from 0.9 °C to 5.4 °C in summer, and from 0.7 °C to 4.2 °C in winter.
- hot summers are expected to become more common. In the recent past (1981-2000) the chance of seeing a summer as hot as 2018 was low (<10%). The chance has already increased due to climate change and is now between 10-20%. With future warming, hot summers by mid-century could become even more common (~50%).
- human-induced climate change has made the 2018 record-breaking UK summer temperatures about 30 times more likely than it would be naturally.
- by 2070, in the high emission scenario, average changes in rainfall patterns across the UK are projected to range from -47% to +2% in summer, and between -1% to +35% in winter.
- by the end of the century, sea levels are projected to rise by between 0.53 m and 1.15 m in the high emission scenario.

Change in Climate (relative to the 1981-2000 average)	UKCP18 Emissions Scenarios for London 2050-2069		
	Low Emissions (RCP 2.6)	Medium Emissions (RCP 4.5)	High Emissions (RCP 6.0)
TEMPERATURE			
Increase in mean annual temperature (°C)	+ 1.4 °C	+ 1.7 °C	+ 1.6 °C
Increase in mean winter temperature (°C)	+ 1.2 °C	+ 1.5 °C	+ 1.4 °C
Increase mean summer temperature (°C)	+1.8 °C	+ 2.2 °C	+ 2.1°C
RAINFALL			
Increase in mean winter precipitation (%)	+ 8%	+ 8%	+ 8%
Increase mean summer precipitation (%)	- 15 %	- 15 %	- 17%

Source: UK Climate Impacts Programme Projections (UKCP18)

Intergovernmental Panel on Climate Change (IPCC) - Sixth Assessment Report

According to the Sixth Assessment Report (AR6) of the Intergovernmental Panel on Climate Change (IPCC, 2023), human activities, principally through emissions of carbon dioxide and other greenhouse gases, have unequivocally caused global warming, with global surface temperatures reaching 1.1°C above the 1850-1900 average from 2011-2020. Global greenhouse gas emissions have continued to increase. In 2019, atmospheric CO₂ concentrations (410 parts per million) were higher than at any time in at least 2 million years.

Human-caused climate change continues to drive an increase the frequency and severity of extreme weather events across the globe, such as heatwaves, heavy precipitation, droughts, and storm events. Climate change is also affecting food and water security for millions of people and causing widespread and irreversible damage to ecosystems, wildlife habitats and species;

The Sixth Assessment Report concludes that:

- the current decade represents the last chance to implement effective climate policies that are sufficient to meet the global challenges of climate change
- 1.5°C of warming could be exceeded by 2030, 10 years earlier than anticipated by the IPCC's 5th Assessment Report.
- limiting the rise in average global temperatures to 1.5°C in line with the Paris Agreement's most ambitious goal will still lead to serious and sometimes irreversible consequences for centuries.
- limiting warming to 1.5 °C is possible, but would require emissions to be cut 50% by the year 2030 and 100% by 2050.

⁷⁵ UKCP18 data is available at are available from the Centre for Environmental Data Analysis (CEDA) website at <https://www.ceda.ac.uk/>

⁷⁶ UKCP18 projections provide local low, central and high changes across the UK, corresponding to 10%, 50% and 90% probability levels. These local values can be averaged over the UK to give a range of average precipitation changes between the 10% and 90% probability levels

- limiting the rise in average global temperatures to 2.0°C would still require the commitment of effective, ambitious, and coordinated climate policies in terms of restricting the use of fossil fuels, especially during this decade
- humanity has emitted 2,560 billion equivalent tons of CO₂ since 1750, and we only have a budget of 500 more if we want to limit warming to 1.5°C.
- the two main outcomes from the COP26 conference in November 2021 were the signing of the Glasgow Climate Pact and agreeing the Paris Rulebook. While these set out a number of resolutions setting out what needs to be done to tackle climate change, it did not identify what each country must do and is not legally binding.

Per Capita Carbon Dioxide Emissions in LB Sutton

Indicator	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019
Per capita CO ₂ emissions (tonnes/person)	4.21	4.39	3.88	4.16	3.97	3.44	3.27	3.03	2.87	2.85	2.74

UK local authority and regional carbon dioxide emissions national statistics for 2005-18 (BEIS, June 2019)⁷⁷

Figure 4.18: Per Capita Carbon Dioxide (CO₂) Emissions in LB Sutton from 2009 to 2019

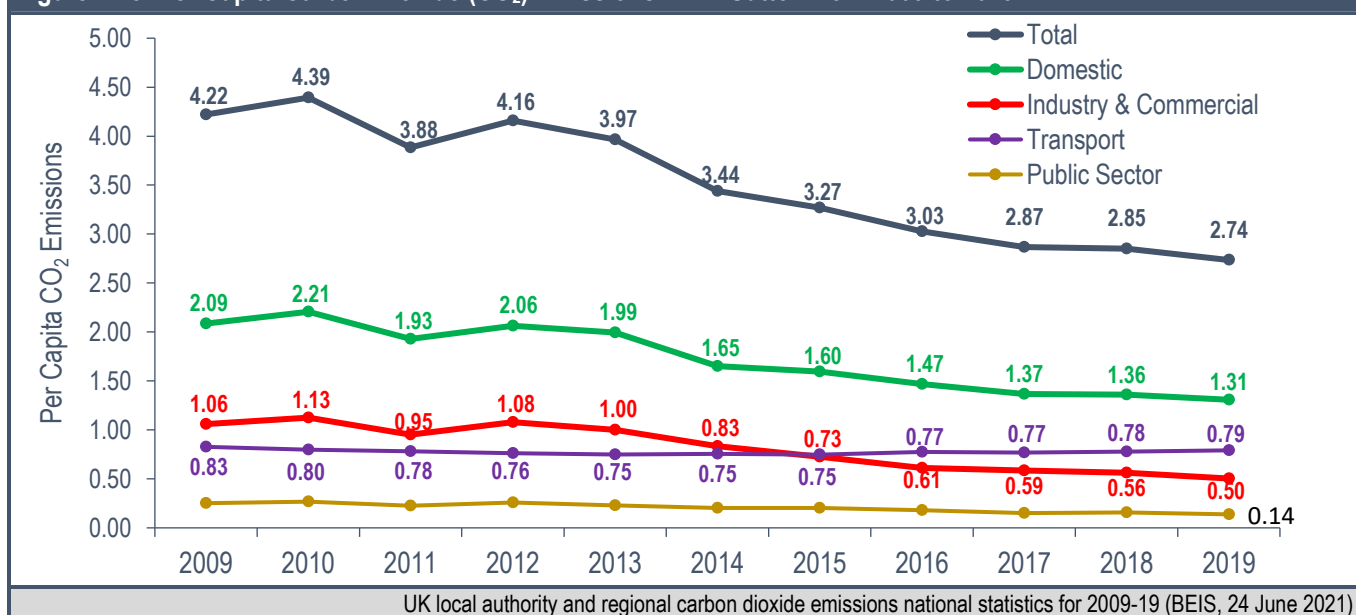
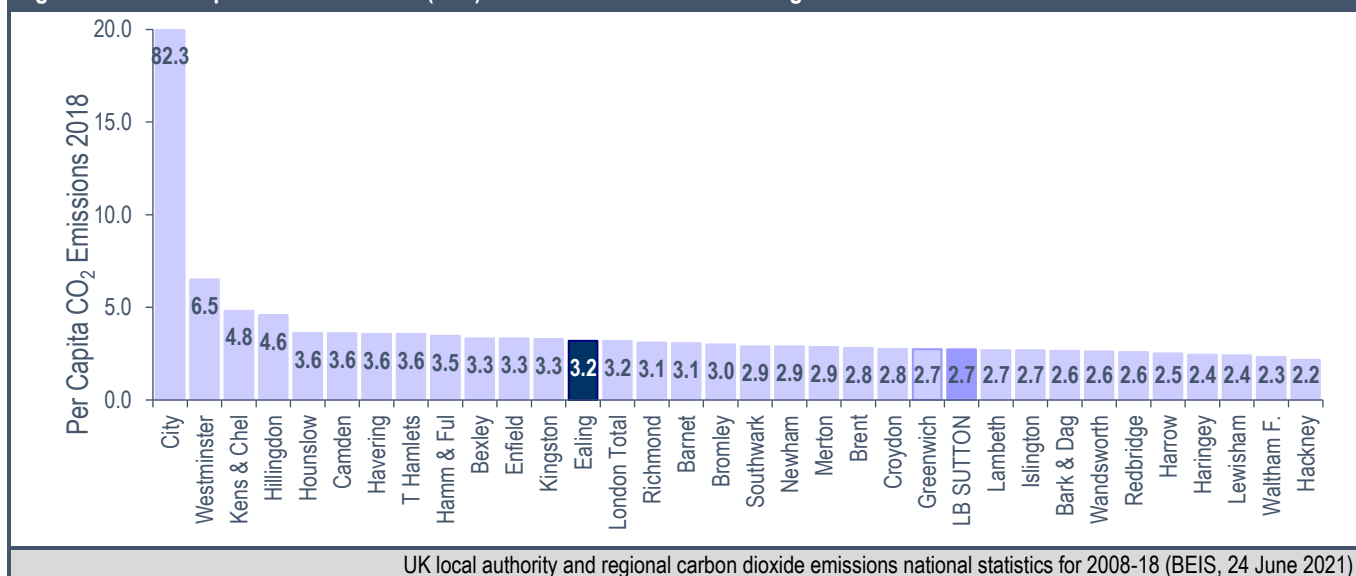


Figure 4.19: Per Capita Carbon Dioxide (CO₂) Emissions for London Boroughs 2019



⁷⁷ national statistics on CO₂ emissions at <https://www.gov.uk/government/statistics/uk-local-authority-and-regional-carbon-dioxide-emissions-national-statistics-2005-to-2018>

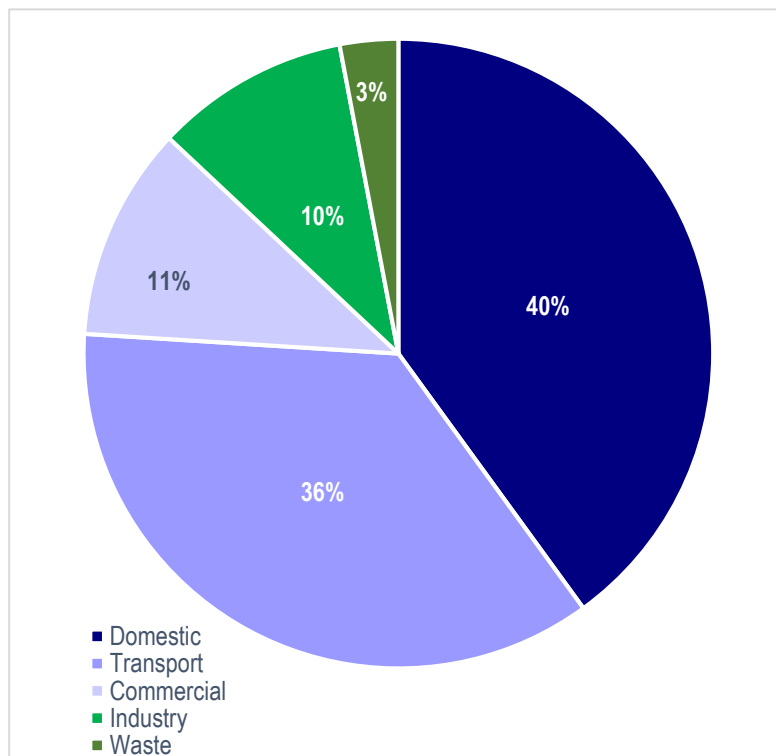
Review of Borough Carbon Emissions

The Net Zero Carbon Roadmap prepared by Your Carbon Strategy Ltd on behalf of LB Sutton in 2023 identified that:

- the London Borough of Sutton as a whole currently emits 619 kt CO₂e per annum, across all sectors;
- total Borough carbon emissions have fallen by 39% since 2000,
- total Borough carbon emissions are also projected to decrease by 65% by 2050 (on 2000 emissions levels).
- of remaining emissions in 2050, 73% can be mitigated by widely-available, commercially-tested low-carbon interventions.
- total Borough carbon emissions per capita (3 t CO₂e) are currently slightly lower than the London average (3.2 t).
- under a business-as-usual scenario, it is projected that between 2000-2050, Sutton's emissions will have fallen by 65%.
- These figures currently don't account for consumption-based emissions, i.e.. those associated with the goods and services

Net Zero Carbon Roadmap prepared by Your Carbon Strategy Ltd 2023

Figure 4.20: Borough greenhouse gas emissions in LB Sutton kt CO₂e in 2022



33. 0)

Carbon reductions delivered in new-build residential developments completed in 2021-22

Number completed in 2021-22	Met CO ₂ reduction target in force when granted (19%/ 35% on Pt L 2013)	Met 35% CO ₂ reduction target set out in Local Plan Policy 31	Met previous 19% CO ₂ reduction target	Average % CO ₂ reduction per scheme/ dwelling in 2021-22 (compared to Part L 2013)
NEW BUILD RESIDENTIAL SCHEMES COMPLETED IN 2021-22				
21 SCHEMES New-Build ⁷⁸	18 out of 21 completed new-build residential schemes (85.7%)	10 out of 21 completed new-build residential schemes (47.6%)	20 out of 21 completed new-build residential schemes (95.2%)	Average 34.6% reduction per new-build scheme (33.3% in 2020-21)
NEW BUILD RESIDENTIAL DWELLINGS COMPLETED IN 2021-22				
347 GROSS DWELLINGS	327 completed new-build dwellings (94.2%)	141 out of 347 completed new-build dwellings (40.6%)	326 out of 347 completed new-build dwellings (93.9%)	33.2% reduction per new-build dwelling (44.0% in 2020-21)
Estimated cumulative CO ₂ savings achieved by new-build schemes in 2021-22			TOTAL CO ₂ saving: 204.7 tonnes per annum (tpa) (Average CO ₂ saving per dwelling: 0.59 tpa)	

Carbon offsetting and achieving net 'zero carbon'

Progress on carbon offsetting as of July 2023

The requirement for all major residential developments to deliver net 'zero carbon' standards through carbon offsetting was introduced from 1 October 2016 through Policy 5.2 of the London Plan 2016. The zero carbon target and carbon-offsetting requirement was subsequently carried forward in Policy 31 of the Sutton Local Plan adopted in 2018 and in Policy SI 2 of the New London Plan 2021. Further local guidance on how the carbon offsetting is intended to operate within the borough is set out in the council's Technical Guidance Note⁷⁹ on 'Building a Sustainable Sutton' introduced in June 2018.

Major proposals must firstly seek to minimise on-site CO₂ emissions by at least 35% compared to Part L of the Building Regulations⁸⁰ through the use of the Mayor's updated energy hierarchy (1) be lean (2) be clean (3) be green; and (4) be seen: monitor and report on performance. Remaining emissions must then be offset (to 100%) through a financial contribution to a local carbon offset fund secured through a Section 106 agreement or unilateral undertaking. The introduction of the New London Plan in March 2021 extended the zero carbon and offsetting requirement to major commercial developments, set a new emissions baseline equal to the target emission rate (TER) for Part L 2021 compliance and raised the Mayor's carbon price from £60 per tonne over 30 years to £95

As of April 2023, a **total of £126,186.14 of carbon offset funding is available to spend** from four major residential developments which have commenced on site and a further £3,694.33 of carbon offset funding is due. A total of £744,311.40 could potentially be secured in future from major residential developments which have yet to commence (offsetting 316.5 tonnes of CO₂ per annum)

This will be used to deliver the zero carbon target in Local Plan Policy 31 by offsetting 131.2 tonnes of CO₂ emissions per annum).

⁷⁸ for the purposes of this table, 'new-build' dwellings include residential extensions involving the creation of at least one self-contained dwelling

⁷⁹ the Technical Guidance Note is available at

<https://modern.gov.sutton.gov.uk/documents/s59852/9%20Local%20Plan%20Technical%20Guidance%20Note%20-%20Appendix%20A.pdf>

⁸⁰ the Mayor's Energy Assessment Guidance (GLA, 2022) recommends that this percentage reduction should be based on the updated carbon factors in SAP 10.2 to account for the decarbonisation of the national grid since 2013

Progress towards LBS Climate Emergency Plan objectives under 'Achieving Net Zero Carbon'

Progress on carbon offsetting as of July 2023

Energy use in the council estate

- in 2021-22, the Council commissioned its contractor Mitie Energy Ltd to undertake a review of the 10 highest energy consuming corporate properties as the basis of an application to the Government's Public Sector Decarbonisation Scheme (PSDS). Nine Council properties were surveyed to identify retrofit technologies for carbon savings. A successful application was made to the PSDS (January 2023) for Sutton Youth Centre and a submitted contract is being analysed;
- the corporate and commercial estate continue to have sustainability surveys undertaken and further survey reports will support further applications for funding;
- the introduction of battery storage and electric vehicle charging points at Civic Offices was explored further in 2022. A business case for extra funding for EV charging stations at Civic Offices and The Inclusion Centre is currently being produced.
- the Council's contractor Mitie Ltd is committed to switching to electric vehicles by the end of 2023.

Pathway to net zero

- initial 'net zero' pathway work has been undertaken by consultants and shared with officers and the Council's Environment Strategy Board. Further work is underway and a final report due in 2023-24. .
- all policies now need to undertake a climate impact assessment prior to Committee.

Sutton Decentralised Energy Network (SDEN)

- Sutton Decentralised Energy Network (SDEN) is a district heating scheme which uses waste heat from the Beddington Energy Recovery Facility to power homes in the borough. It currently serves the New Mill Quarter development in Hackbridge (formerly the Felnex industrial estate);
- connection surveys of existing buildings are underway to establish potential heat loads and options for expanding the network. A tender launch is imminent for a heat connection to the Clarion Lavenders development for 348 properties with a projected 'heat on' target date of March 2024.

Sutton Housing Partnership (SHP)

- work continues on improving the SAP (Standard Assessment Procedure) rating of the Council housing stock through the Housing Revenue Account (HRA) capital programme. The £1.75m Social Housing Development Fund (SHDF) 1) programme is on track to complete in June 2023 & SHDF 2 funding has now secured through collaborative bid which will see further properties retrofitted with similar measures.
- plans are being developed for low-carbon alternatives to individual gas boilers in new and existing homes, the focus for the programme for the coming year will continue to be 'fabric first', and deploying the resources available to deliver the 100% EPC C target (aspiring to EPC B) by 2030.

Housing - council new builds and regeneration

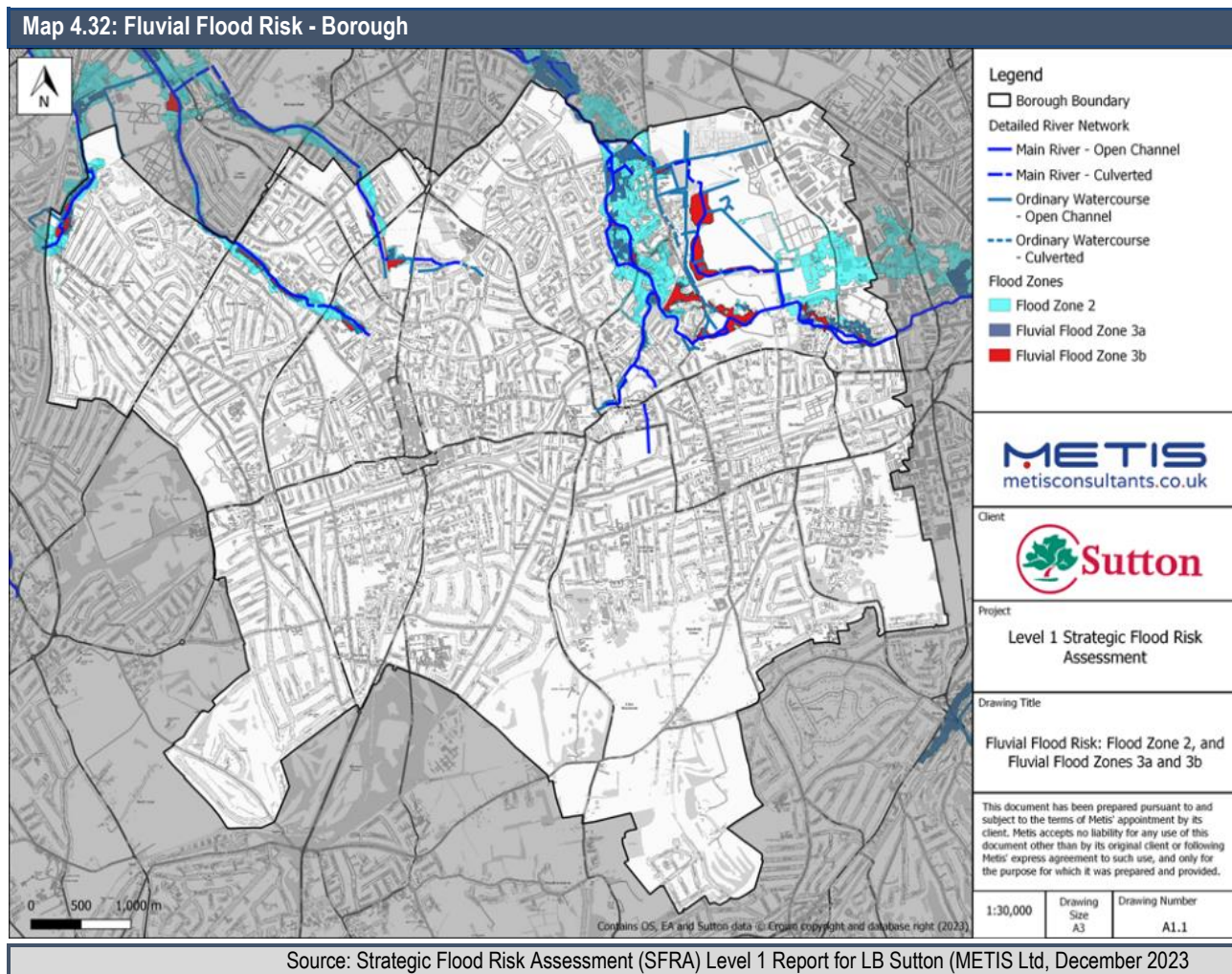
- planning permission was obtained for the council's first new build *PassivHaus* housing developments including at Gower House, 75 Woodcote Road (DM2023/00344) granted on 23 March 2023 and at 30-32 Beddington Lane DM2023/00084). granted on 16 February 2023.
- all Phase 2c social housing projects are to be *Passivhaus* accredited.

Fuel poverty and energy efficiency

- the Sutton Healthy Homes Project which prioritises vulnerable residents at risk of fuel poverty, ended at the end of March 2023. However the council has agreed to extend the contract by a further 24 months.
- HUG2 consortium bid led by the Greater Southeast Net Zero hub (GSENZH) for upgrade of low income, EPC D-G homes, heated electrically or by other non-gas means was successful. Funding from 2023-25

FLOOD RISK

Fluvial (River) Flooding: Environment Agency Flood Zones

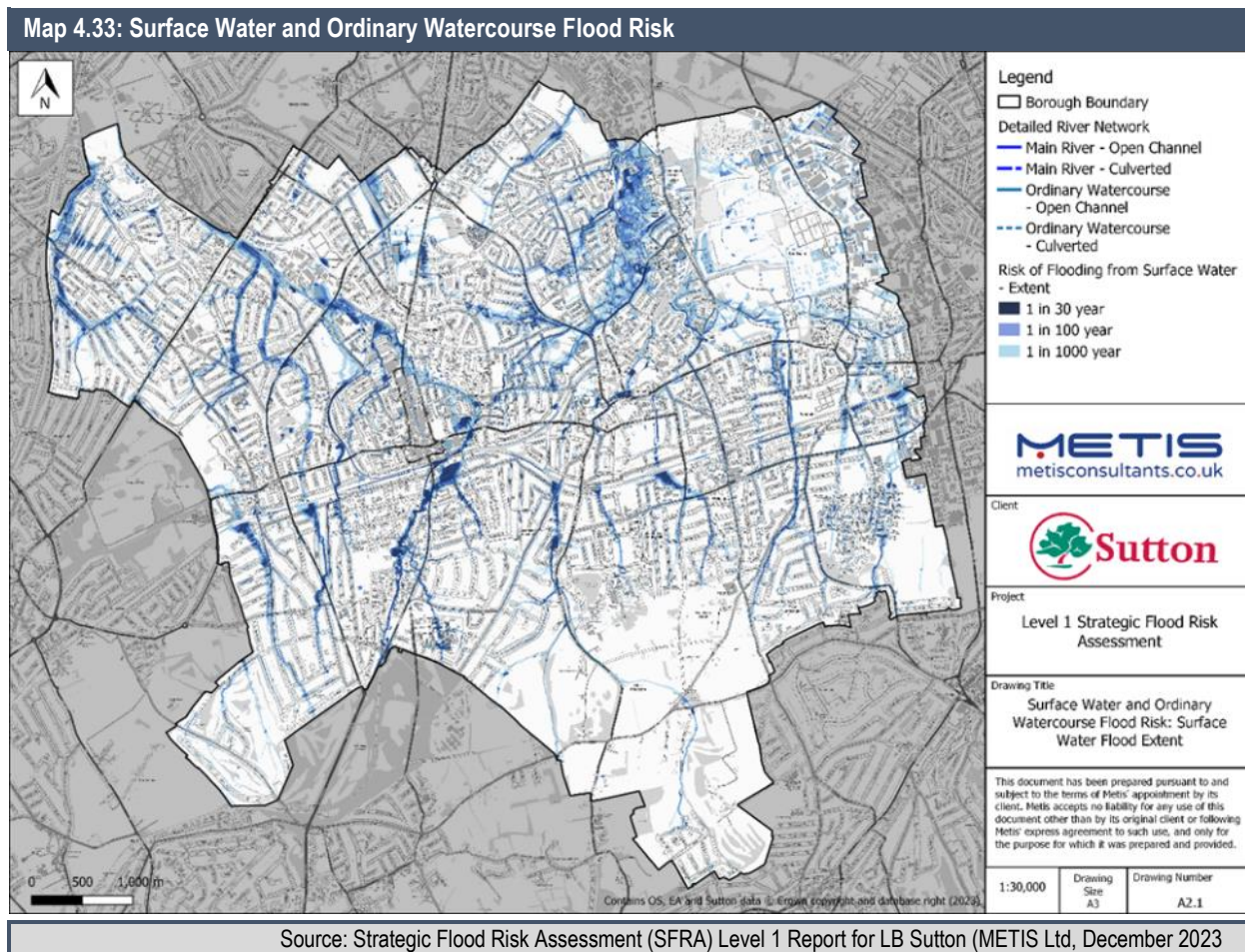


Fluvial (River) Flooding: Dwellings at Risk

EA Flood Zone	Flood Risk	% of Borough	Number of Dwellings
Flood Zone 1 Low Risk	Less than 1 in a 1000 annual probability of flooding (<0.1%)	96.3%	76,352 dwellings (96.3%)
Flood Zone 2 Medium Risk	Between 1 in a 100 and 1 in a 1000 annual prob of flooding (1% - 0.1%)	2.4%	1,889 dwellings (2.4%)
Flood Zone 3a High Risk	More than 1 in a 100 annual probability of flooding (>1%)	1.0%	822 dwellings (1.0%)
Flood Zone 3b Functional Floodplain	More than 1 in 20 annual probability of flooding (>5% 'defended').	0.2%	198 dwellings (0.2%)

Sources: Strategic Flood Risk Assessment (SFRA) Level 1 Report for LB Sutton (AECOM, December 2015) and EA flood risk extents (undefended) taking account of revised modelling for the Wandle (Environment Agency, May 2015)

Surface Water Flooding: Borough Flood Risk Map



Commentary: Map 4.33 shows the extent of surface water flood risk across the borough based on the EA's risk of flooding from surface water (RoFSW) map for the 1 in 30 yr (3.3% AEP); 1 in 100 yr (1% AEP) and 1 in 1,000 yr (0.1% AEP) events. In parallel with the EA's fluvial Flood Zones (see above), the SFRA Level 1 Report defines equivalent flood zones for surface water as follows:

- Flood Zone 3a (surface water): EA-modelled surface water flood extents for greater than 1 in 100 yrs (>1% AEP);
- Flood Zone 3b (surface water): EA-modelled surface water flood extents for at least 1 in 30 years ($\geq 3.3\%$ AE)

Surface Water Flooding: Dwellings at Risk in the 1 in 100 year storm event

Risk	Surface Water Flood Risk	No of Dwellings	Other Props	Unclassified
Very Low	Less than 1 in a 1000 annual probability (<1%)	65,800 (83.0%)	Not known	Not known
Low	Between 1 in 100 and 1 in a 1000 annual probability (1% - 0.1%)	8,923 (11.3%)	749	582
Medium	Between 1 in 30 and 1 in a 100 annual probability (3.3% - 1%)	2,920 (3.7%)	255	176
High	More than 1 in a 30 annual probability (>3.3%)	1,637 (2.1%)	121	108

Sources: Surface Water Management Plan Update – (Metis September 2019) and EA 'Surface Water Flood Map (EA, December 2013)

Surface Water: New catchments and sub-catchments

Sub-Catchments

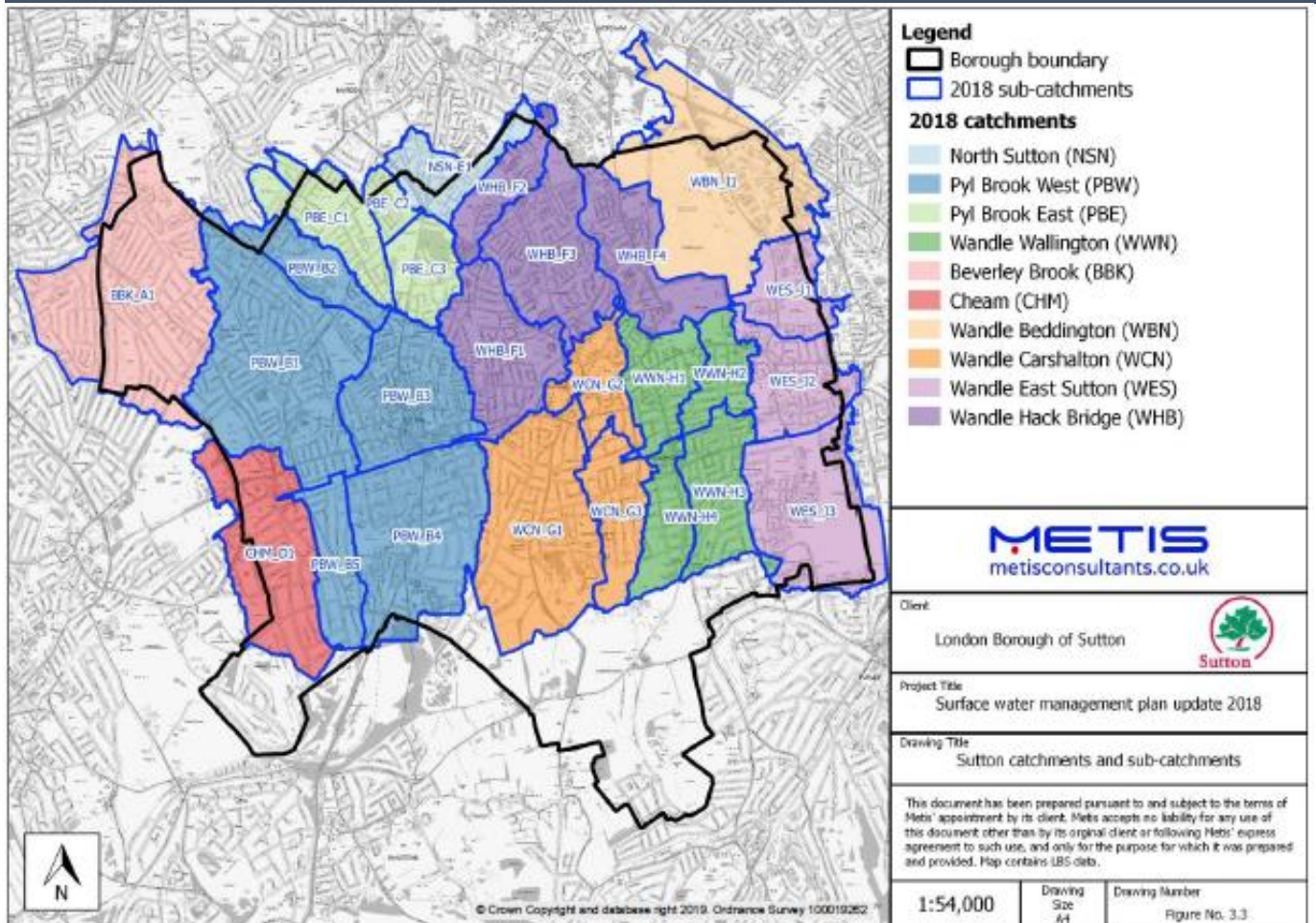
National planning policy on flooding has become increasingly catchment-focused over the past decade. This approach also better matches the Environment Agency's river basin approach used for fluvial flood risk management. Accordingly, Sutton's approach is now based on the delineation of hydrological / drainage catchments. These are referred to as 'sub-catchments' and supersede the Critical Drainage Areas (CDAs) identified in the previous Borough Surface Water Management Plan (SWMO) published in 2011. Each catchment area is made up of a series of sub-catchments, with boundaries representing distinct contributing areas within the wider hydrological catchment.

Surface Water Flooding: Catchments and sub-catchments

New Catchments (10)	New Sub-Catchments (25)	
• Beverley Brook (BBK)	• Wandle Wallington (WWN)	• E1 (one sub-catchment)
• Pyl Brook West (PBW)	• Wandle Beddington (WBN)	• F1, F2, F3 and F4 (four sub-catchments)
• Pyl Brook East (PBE)	• Wandle East Sutton (WES).	• G1, G2 and G3 (three sub-catchments)
• Cheam (CHM)	• A1 (one sub-catchment)	• H1, H2, H3 and H4 (four sub-catchments)
• North Sutton (NSN)	• B1, B2, B3, B4 and B5 (five sub-catch)	• I1 (one sub-catchment)
• Wandle Hackbridge (WHB)	• C1, C2 and C3 (three sub-catchments)	• J1, J2 and J3 (three sub-catchments)
• Wandle Carshalton (WCN)	• D1 (one sub-catchment)	•

Sources: Surface Water Management Plan Update – Table 2.1 (Metis consultants on behalf of LB Sutton, September 2019)

Map 4.34: Surface water catchments and sub-catchments



Surface water flooding incidents investigated in 2021

Date of Event	Estimated Return Period ⁸¹	Properties affected ⁸²	Thames Water Reports	Notes
12 July 2021	1 in 179 year	2	0	Critical infrastructure (A2043 Malden Rd) affected at the underpass by Worcester Park station together with some properties affected by internal flooding. Section 19 investigation undertaken into Critical Drainage Area (CDA) 22 Worcester Pk
25 July 2021	≤1 in 100 year	8	6	
7 August 2021	≤1 in 20 year	3	2	
20 October 2021	TBC	TBC	TBC	

⁸¹ return periods have been provided by Thames Water Utilities Ltd (TWU) and are to be confirmed by the MET Office

⁸² based on lead local flood authority (LLFA) reports of internal flooding

Flood alleviation schemes

Current Progress on Flood Alleviation Schemes

Worcester Park Flood Alleviation Scheme (CDA 22)

Funding approved from Environment Agency and Thames Water. The proposed design consists of a wetland and dry basins that will attenuate storm water before releasing it back into the Thames Water surface water sewer network at a controlled rate. Work completed: The EA National Project Assurance Service (NPAS) (the EA's external reviewer) recommended approval of the Outline Business Case (OBC) and a Grant in Aid application has been approved; detailed design and stakeholder engagement phase; planning and sewer diversion applications.

- **Work completed:** The EA National Project Assurance Service (NPAS) (the EA's external reviewer) recommended approval of the Outline Business Case (OBC) and a Grant in Aid application has been approved; detailed design and stakeholder engagement phase; planning and sewer diversion applications.
- **Next steps:** Awaiting all permissions, and construction. Construction expected in 2025.

Beddington Gardens/ Wallington Station (CDAs 29 and 30) and South Beddington - including Demesne Road (CDA 31)

This project covers a large catchment area. A feasibility report has been completed however the economic analysis found that none of the options would be proportional. We understand that the council is now investigating alternative approaches

Surface Water Flooding: Top Five Mitigation Options

Top Five Mitigation Options⁸³ to be Prioritised for Further Investigation

- (1) Flood storage areas in Wandle East Sutton-J3 in South Beddington (27 properties in the 1 in 100 yr storm to benefit)
- (2) Flood storage areas in Pyl Brook East-C1 in Stonecot and Sutton Nth (14 properties in the 1 in 100 year storm to benefit)
- (3) Flood storage areas in Wandle Hackbridge-F1 north of Carshalton (63 properties in 1 in 100 year storm event to benefit)
- (4) Flood storage areas in Pyl Brook West-B3 around Sutton Town Centre and the area to the north (36 properties in the 1 in 100 year storm event to benefit)
- (5) Flood storage areas in Pyl Brook West-B1 located in North Cheam (11 properties in 1 in 100 year storm event to benefit)

⁸³ these options are focused on areas of the borough where no central government flood risk grant funding has previously been spent

River Wandle

River Wandle: Background

The River Wandle is one of the finest chalk streams in London of which there are only around 200 in the world. Within the borough, the River Wandle extends from its sources at Wandle Park (Beddington branch) and Carshalton Ponds (Carshalton branch) to the confluence of the two branches at Wilderness Island before running northwards through Hackbridge, then alongside Beddington Farmlands and the Wandle Trading Estate before reaching the borough boundary. At Mitcham, a short tributary called the Beddington Corner branch also joins the main channel and this carries discharge from Beddington Sewage Treatment Works. Although the Wandle retains natural banks for much of its length, other areas remain heavily managed, with culverts, artificial channels, run-off ditches and subterranean stretches. Many chalk streams like the Wandle are affected by urbanisation, over-abstraction, pollution and the impacts of treated sewage effluent.

In recognition of these pressures, the EA, the Wandle boroughs, the Wandle Trust, London Wildlife Trust, local anglers, local residents and other stakeholders worked together to prepare the River Wandle Catchment Plan⁸⁴ (September 2014). The plan follows the EA's catchment-based approach for river management, and at that time it was intended to help the Wandle to achieve 'Good Ecological Potential' in order to meet the UK's obligations under the previously applicable EU Water Framework Directive (2000/60/EC).

Sources: LB Sutton Surface Water Management Plan 20112 and Wandle Trust

River Quality Monitoring

The EA uses a number of indicators to monitor the Carshalton Arm of the Wandle and the Croydon - Wandsworth branch against EU Water Framework Directive targets ranging from High, Good, Moderate, Poor to Bad. The EA's Thames River Basin Management Plan 2015-21 sets out objectives which all waterbodies should meet by 2021 irrespective of whether or not the relevant Water Framework Directive targets are retained in UK legislation following BREXIT.

Carshalton Arm

Based on the latest available monitoring data⁸⁵ for 2019, the Carshalton Arm of the Wandle (2.1 km) is currently assessed as 'bad' overall for water quality ('bad' for ecological quality and 'fail' for chemical quality) and is therefore not on track to meet the 2021 target of 'good'. Water quality in the Carshalton Arm has therefore deteriorated since 2016 (the previous monitoring year) when water quality was assessed as 'good'.

The ecological quality of the Carshalton Arm is failing due to the hydrological regime. The Carshalton Arm is augmented with a pumped recirculation system to mitigate for abstraction of the aquifer by SES Water. Since the last classification in 2016, these pumps have failed on 3 occasions. This therefore impacted the ecology of the river.

The chemical quality of the Carshalton Arm is apparently failing largely due to a new suite of chemical tests being adopted since the last classification round. Effectively all rivers in the UK now fail for chemistry. This may not demonstrate a deterioration in water quality due to the nationwide findings but this cannot be ruled out. The EA has not provided a detailed breakdown for this failure to date.

River Wandle (Croydon to Wandsworth)

As of 2019, the River Wandle (Croydon to Wandsworth) waterbody (24.08 km) is assessed as 'moderate' overall for water quality ('moderate' for ecological and 'fail' for chemical quality) and is also not on track to meet the 2021 target of 'good'. While the overall rating has remained stable, there has been a deterioration in chemical quality which was rated as 'good' in 2016. In previous years, this branch has been affected by high levels of phosphate and ammonia arising from the Beddington Sewage Works (STW) and was designated as a Sensitive Area (Eutrophic) under the EU Urban Waste Water Treatment Directive.

As with the Carshalton Arm (see above), the chemical quality of the Croydon to Wandsworth waterbody is apparently failing largely due to a new suite of chemical tests being adopted since the last classification round. Effectively all rivers in the UK now fail for chemistry.

Source: Environment Agency

⁸⁴ the River Wandle Catchment Plan 2014 is available at <https://www.wandletrust.org/about-us/community-catchment-plan/>

⁸⁵ EA river quality monitoring data is available at <https://environment.data.gov.uk/catchment-planning/summarypages/summary/WaterBody/GB106039023460>

Water Resources and Household Water Consumption

Indicator	2016-17	2017-18	2018-19	2019-20
Domestic water consumption (litres per person per day)	161 l/p/d	147 l/p/d	147 l/p/d	147 l/p/d
Note: The EA report 'Water stressed areas 2021' ⁸⁶ identifies LB Sutton as being located in an area of 'serious water stress'				
Source: Sutton and East Surrey Water: Water Resources Management Plan September 2019				

Water Efficiency of new Dwellings

Indicator	2019-20	2020-21	2021-22	LP Target	Target Met?
Proportion of completed dwellings limiting consumption to below 110 l/p/day EXCLUDING 'office to residential's'. ⁸⁷	85.6% (500 of 584)	100.0% (353 of 353)	100.0% (347 of 347)	100%	✓
Proportion of all new dwellings (gross) limiting domestic water consumption to below 110 litres per person per day	82.2% (500 of 608)	97.4% (344 of 353)	100.0% (347 of 347)	100%	n/a
Source: LB Sutton 2023					

AIR POLLUTION

Sources of air pollution in LB Sutton

Air pollution within the London Borough of Sutton comes from many sources, including from outside the borough boundaries and, in the case of particulates, a significant proportion of this comes from outside of London. According to the London Atmospheric Emissions Inventory (LAEI) 2019, the main sources of NO₂ emissions within the borough are from road transport (35%), industrial processes (36%) and from heat and power generation (23%), while particulates (PM10s and PM2.5) originate mainly from road transport (28%), construction (27%) and domestic biomass (12%).

Automatic air pollution monitoring sites

There are four automatic air pollution monitoring sites within the borough: at Wallington, Beddington Lane North, Beddington Village and at Worcester Park.

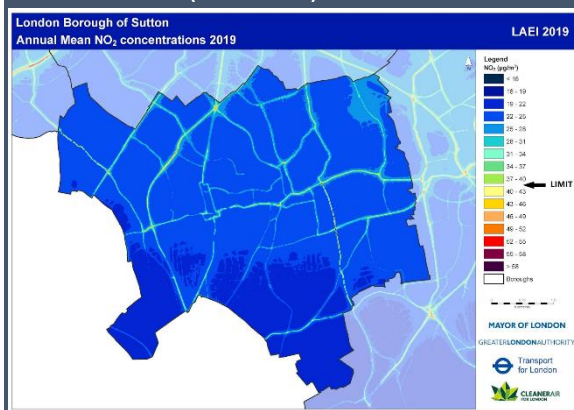
Air Quality Management Areas (AQMAs) and Air Quality Focus Areas (AQFAs)

In 2013, an Air Quality Management Area (AQMA) was declared across the entire borough for the following reasons:

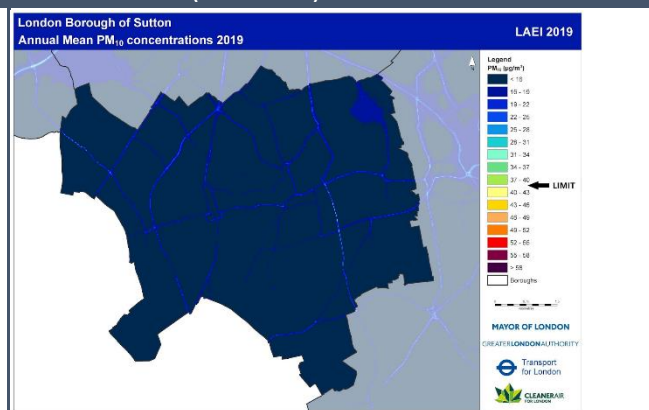
- NO₂ - because levels of this pollutant were continuing to fail the relevant national targets and air quality modelling indicated that these targets were likely to be breached at a number of other locations; and
- Particulates (PM10s and PM2.5) - levels were meeting national targets, but were continuing to fail WHO guidelines.

Air Quality Focus Areas (AQFA) are defined as locations that not only exceed the relevant annual mean limit values for NO₂ but are also locations with high human exposure. 187 AQFAs across London were designated by the Mayor in 2013, including three in LB Sutton at Sutton Town Centre (A232 Cheam/Carshalton Road/ High St/ Brighton Road); Wallington (Manor Road/ Stanley Park Road/ Stafford Road); and Worcester Park (Central Road/ Cheam Common Road).

Map 4.35 Modelled map of annual mean NO₂ concentrations (LAEI 2019)



Map 4.36: Modelled map of annual mean PM10 concentrations (LAEI 2019)



⁸⁶ the EA report entitled 'Water stressed areas – final classification 2021' is available at <https://www.gov.uk/government/publications/water-stressed-areas-2021-classification>

⁸⁷ the council is unable to enforce minimum environmental performance standards (including the requirement in Local Plan Policy 33) for dwellings to limit domestic water consumption to below 110 litres per person per day, for Prior Approvals covered by the General Permitted development Order (GPDO)

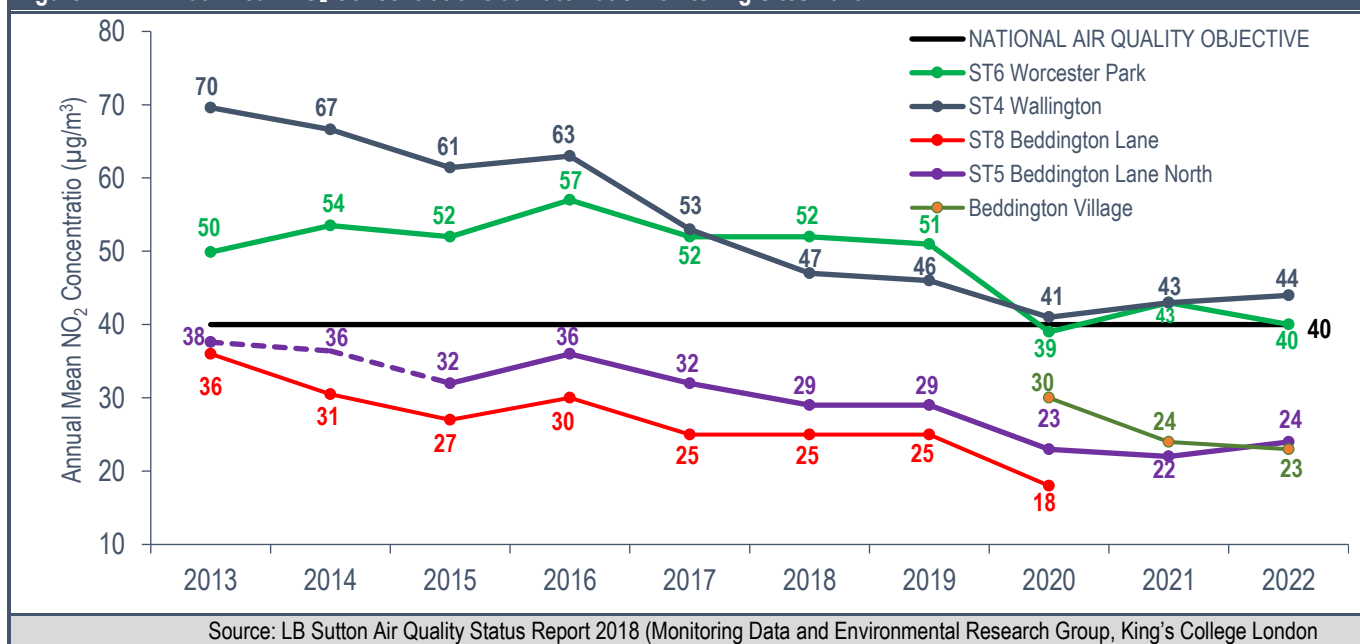
Nitrogen Dioxide (NO₂) – Automatic Monitoring Sites

Pollutant	National Air Quality Objective/ Local Plan Target	2021		2022	
		Level	Target Met?	Level	Target Met?
WALLINGTON (ST4)					
NO ₂	40 µg/m ³ as an annual mean	43 µg/m ³	x	44 µg/m ³	x
NO ₂	200 µg/m ³ as a 1 hour mean, not to be exceeded more than 18 times a year	1 time	✓	0 time	✓
BEDDINGTON LANE NORTH (ST5)					
NO ₂	40 µg/m ³ as an annual mean	22 µg/m ³	✓	24 µg/m ³	✓
NO ₂	200 µg/m ³ as a 1 hour mean, not to be exceeded more than 18 times a year	0 times	✓	0 times	✓
BEDDINGTON VILLAGE (ST5) *					
NO ₂	40 µg/m ³ as an annual mean	24 µg/m ³	✓	25 µg/m ³	✓
NO ₂	200 µg/m ³ as a 1 hour mean, not to be exceeded more than 18 times a year	0 times	✓	0 times	✓
WORCESTER PARK (ST6)					
NO ₂	40 µg/m ³ as an annual mean	43 µg/m ³	x	40 µg/m ³	✓
NO ₂	200 µg/m ³ as a 1 hour mean, not to be exceeded more than 18 times a year	0 times	✓	0 times	✓

Source: LB Sutton Air Quality Status Report 2023 (Monitoring Data and Environmental Research Group, King's College London⁸⁸)

* for Beddington Village) in 2021, the capture rates for NO₂ was less than 90% (13% and 89%) – results are indicative and may not be representative

Figure 4.21: Annual Mean NO₂ Concentrations at Automatic Monitoring Sites 2013-22



Source: LB Sutton Air Quality Status Report 2018 (Monitoring Data and Environmental Research Group, King's College London)

⁸⁸ air quality monitoring data for the borough is available via the 'London Air' website run by King's college London <https://www.londonair.org.uk>

Particulates (PM₁₀) – Automatic Monitoring Sites

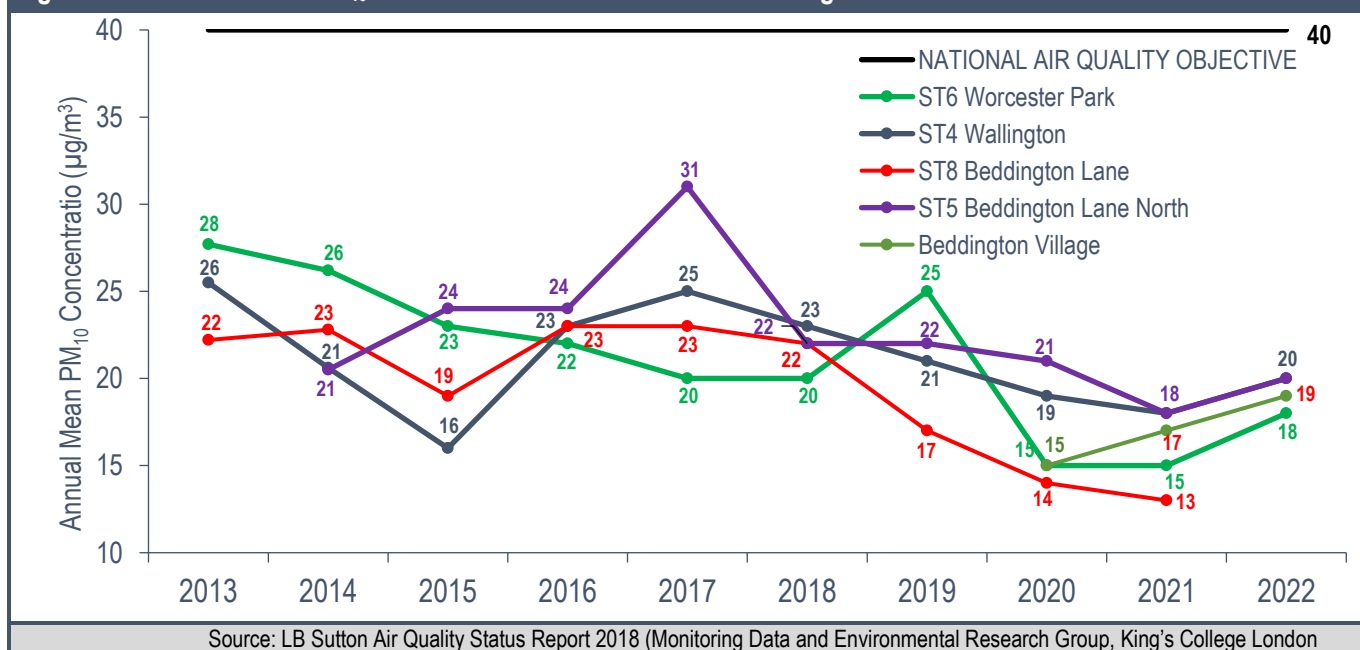
Pollutant	National Air Quality Objective/ Local Plan Target	2020		2021	
		Level	Target Met?	Level	Target Met?
WALLINGTON (ST4)*					
PM10	40 µg/m ³ as an annual mean	18 µg/m ³	✓	20 µg/m ³	✓
PM10	50 µg/m ³ as a 24 hour mean, not to be exceeded more than 35 times a year	0 µg/m ³	✓	0 µg/m ³	✓
BEDDINGTON LANE NORTH (ST5)					
PM10	40 µg/m ³ as an annual mean	18 µg/m ³	✓	20 µg/m ³	✓
PM10	50 µg/m ³ as a 24 hour mean, not to be exceeded more than 35 times a year	1 µg/m ³	✓	0 µg/m ³	✓
BEDDINGTON VILLAGE *					
PM10	40 µg/m ³ as an annual mean	17 µg/m ³	✓	19 µg/m ³	✓
PM10	50 µg/m ³ as a 24 hour mean, not to be exceeded more than 35 times a year	0 µg/m ³	✓	0 µg/m ³	✓
WORCESTER PARK (ST6)					
PM10	40 µg/m ³ as an annual mean	15 µg/m ³	✓	18 µg/m ³	✓
PM10	50 µg/m ³ as a 24 hour mean, not to be exceeded more than 35 times a year	0 µg/m ³	✓	0 µg/m ³	✓
BEDDINGTON LANE (ST8)*					
PM10	40 µg/m ³ as an annual mean	13 µg/m ³	✓	n/a	n/a
PM10	50 µg/m ³ as a 24 hour mean, not to be exceeded more than 35 times a year	0 µg/m ³	✓	n/a	n/a

Source: LB Sutton Air Quality Status Report 2020 and Monitoring Data and Environmental Research Group, King's College London

* for Worcester Park (ST6) in 2021, the capture rates for PM10 were less than 90% (65% and 64%) – results are indicative and may not be representative

* for Beddington Village in 2021, the capture rates for PM10 were less than 90% (21% and 81%) – results are indicative and may not be representative

Figure 4.22: Annual Mean PM₁₀ Concentrations at Automatic Monitoring Sites 2013-22



Air Quality Trends in London

The Mayor's report on 'Improving London's air quality' (2020) demonstrated a significant improvement between 2016 and 2020, particularly for nitrogen dioxide (NO₂) arising from key transport policies such as the Ultra-Low Emission Zone (ULEZ). In 2016 two million Londoners, including 400,000 children, lived in areas that exceeded legal limits for NO₂, with thousands dying prematurely every year due to exposure to air pollution. By 2019, this had reduced by 94% to 119,000 people. The reduction in annual average NO₂ at roadside sites in central London was x5 the national average reduction. State schools in areas exceeding legal NO₂ limits fell by 97% from 455 in 2016 to 14 in 2019. In 2016 monitoring sites in London recorded over 4,000 hours above the short-term legal limit for NO₂. In 2019 this reduced by 97% to around 100.⁸⁹

Sources: LB Sutton Draft Sustainable Transport Strategy 2020

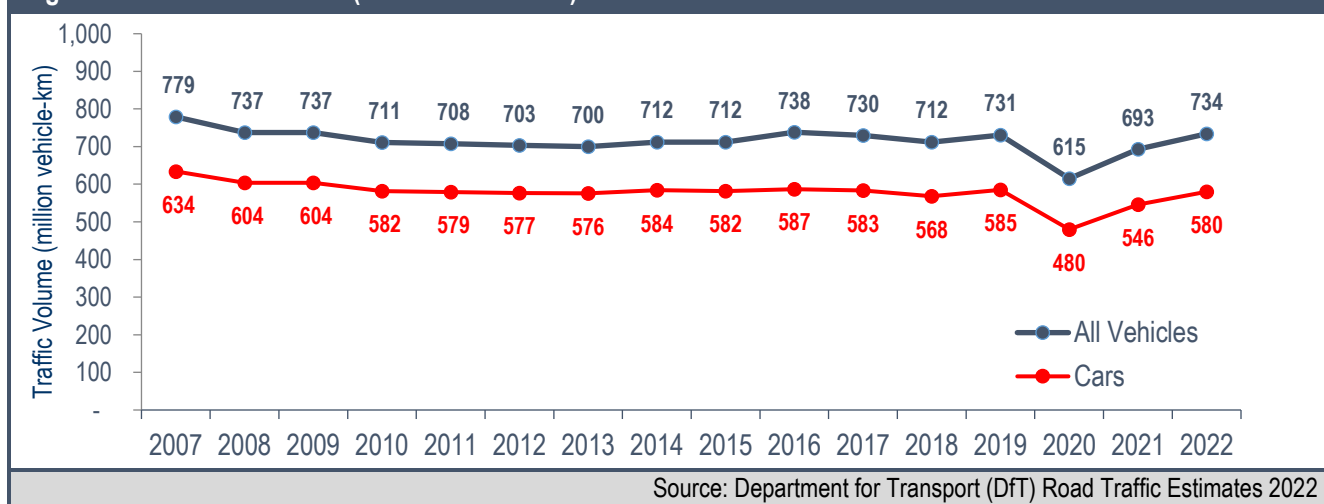
SUSTAINABLE TRANSPORT

Traffic Volumes

Indicator	2020	2021	2022	Change 2021 - 22	LIP Target		Local Plan Target	Met?
					2021	2041		
Total vehicular traffic in borough (m veh-km)	615	693	734	+5.9%	614	583 (-5%) 553 (-10%)	Reduce	X
Volume of car traffic in borough (m veh-km)	480	546	580	+6.2%	n/a	n/a	n/a	X

Source: Department for Transport (DfT) Road Traffic Estimates 2022⁹⁰

Figure 4.23: Traffic Volumes (million vehicle-km) in LB Sutton 2005-22⁹¹



Source: Department for Transport (DfT) Road Traffic Estimates 2022

Car Ownership

Indicator	2020	2021	2022
LB SUTTON			
Number of cars	87,063	86,313	86,162
Number of households (GLA Central Upper Trend 2020-based)	83,753	83,521	84,682
Cars per household (6 th highest in London)	1.04	1.03	1.02 ↓
SOUTH LONDON SUB-REGION			
Cars per household	0.89	0.89	0.87 ↓
LONDON			
Cars per household	0.74	0.74	0.72 ↓

Source: DVLA/DfT: Licensed vehicles (Q1 2022) and GLA Household Projections Central Upper Trend (2020-based) (Sept 2021)

⁸⁹ Transport for London (TfL) Travel in London Report 13 available at <http://content.tfl.gov.uk/travel-in-london-report-13.pdf>

⁹⁰ DfT road traffic estimates are available at <https://www.gov.uk/government/statistical-data-sets/road-traffic-statistics-tra> it should be noted that a minor road traffic benchmarking exercise was undertaken in 2019 which led to a revision of all estimates for the period since.

⁹¹ **Mayor's Transport Strategy TS Outcome 3a:** London's streets will be used more efficiently and have less traffic on them. Traffic will fall and congestion kept in check, allowing more efficient operations. **Mayor's Transport Strategy measure:** A 10-15 per cent reduction in vehicle kilometres by 2041

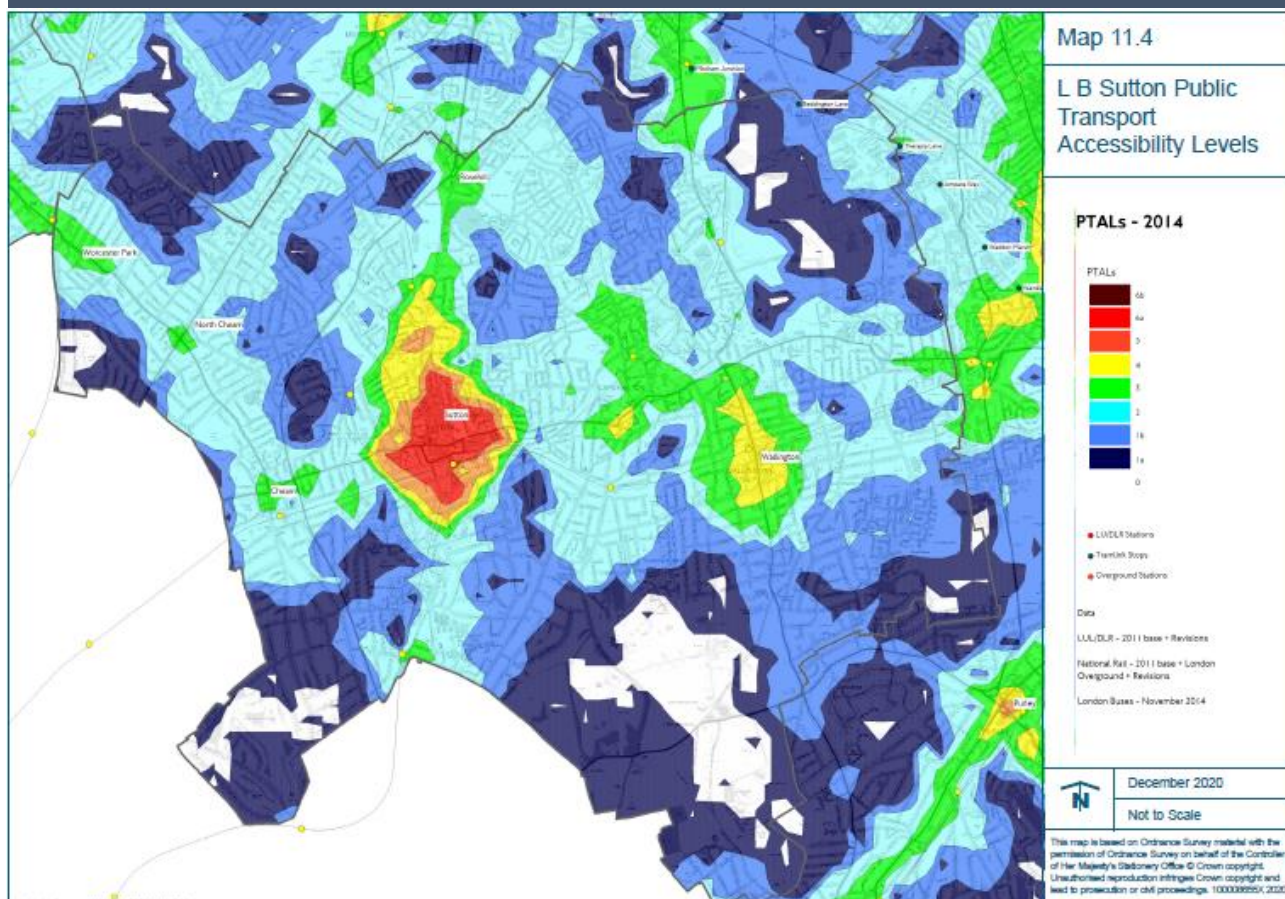
Public Transport Accessibility

Notes

The GLA's latest Public Transport Accessibility Levels (PTAL) map⁹², shows that Sutton Town Centre, Wallington and Carshalton enjoy the highest level of public transport accessibility within the borough (levels 4-6). However, the remaining district and local centres, the majority of the residential areas and the major industrial areas fall within areas of relatively low accessibility (levels 1-3). 95% of the urban area within 400 metres of a bus service,

Source: Transport for London

Map 4.35: LB Sutton Public Transport Accessibility Levels (PTALs)



Public Transport –Trips originating in LB Sutton by rail, bus, tram or underground (3-Yr Rolling Averages)

	Proportion of Trips by Public Transport (%)			
	2016-17	2017-18	2018-19	2019-20
LB Sutton	17%	20%	21.1%	19.1%
Outer London	25.7%	28.1%	25.7%	25.5%
London	28%	33.2%	29.3%	30%

Cycling – Percentage of trips originating in LB Sutton from 2016-17 to 2018-19 (3-Yr Rolling Averages)

	Proportion of Trips by Cycle (%)			
	2016-17	2017-18	2018-19	2019-20
LB Sutton	2%	1.3%	1.1%	0.8%
Outer London	1.6%	1.4%	1.4%	1.6%
London	2.5%	2.6%	2.5%	3.0%

Source: TfL Travel in London Report 13 data (2021) & Healthy Streets Scorecard data

⁹² the GLA PTAL map shows relative levels of accessibility to public transport based on the PTAL methodology development by Hammersmith & Fulham

Walking – Percentage of trips originating in LB Sutton from 2016-17 to 2018-19 (3-Year Rolling Averages)

	Proportion of Trips on Foot (%)			
	2016-17	2017-18	2018-19	2019-20
LB Sutton	26%	24%	25.6%	23.9%
Outer London	27.4%	24.2%	27%	29.5%
London	32.6%	29.4%	32%	33%

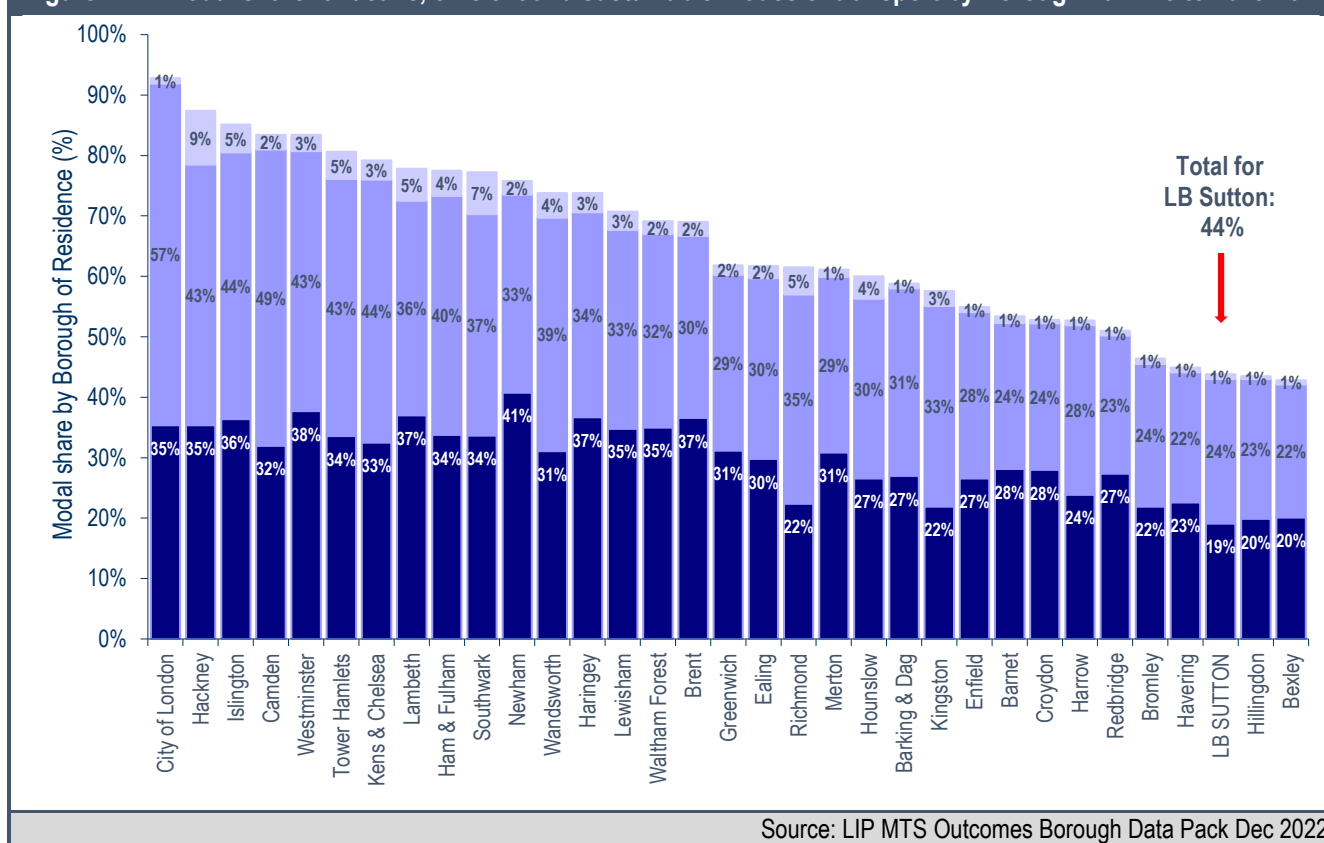
Source: TfL Travel in London Report 13 data (2021) & Healthy Streets Scorecard data

Active, Efficient and Sustainable Modes - Percentage of trips originating in LB Sutton by rail, bus, tram, tube, cycling or walking (3-Year Rolling Averages)

	Proportion of Trips by Active, Efficient and Sustainable Modes (%) (Three Year Rolling Average)						
	2015-16 to 2017-18	2016-17 to 2018-19	2017-18 to 2019-20	Annual Change 2019-20	LIP Target		Target Met
					2021	2041	
LB Sutton	45%	47.8%	43.8%	-4.0%	48.0%	63.0%	X
Outer London	53.4%	54.4%	55.1%	+0.7%	n/a	n/a	n/a
London	63.9%	64.9%	65.6%	+0.7%	n/a	n/a	n/a

Source: LIP MTS Outcomes Borough Data Pack Dec 2022

Figure 4.24: Modal share for active, efficient and sustainable modes of transport by Borough 2017-18 to 2019-20



Modal split for all trips originating in LB Sutton, Outer London and London (3-Year Rolling Averages)

Year	Trips (x1,000)	Rail	Tube	Bus/Tram	Taxi/other	Car/MC	Cycle	Walk
LB SUTTON								
2017-18	453	7%	3.4%	9.2%	1.1%	53.9%	1.3%	24.2%
2018-19	452	7.5%	3.3%	10.3%	0.9%	51.4%	1.1%	25.6%
2019-20	470	7.1%	3%	8.9%	1%	55%	0.8%	24.2%
OUTER LONDON								
2017-18	10,872	5.9%	7%	12.1%	1%	45.9%	1.5%	26.7%
2018-19	10,572	6.2%	7.2%	12.3%	1%	45%	1.4%	27%
2019-20	10,390	6.3%	7.4%	12.3%	1%	43.9%	1.4%	27.6%
LONDON								
2017/18	18,447	5.8%	9.4%	13.7%	1.6%	35.6%	2.5%	31.4%
2018-19	18,047	6.1%	9.6%	13.6%	1.5%	34.7%	2.5%	32%
2019-20	17,794	6.2%	9.8%	13.6%	1.5%	33.7%	2.6%	32.6%

Source: TfL Mode Share Packs

Figure 4.25: Journeys Originating in LB Sutton to 2017-18 to 2019-20

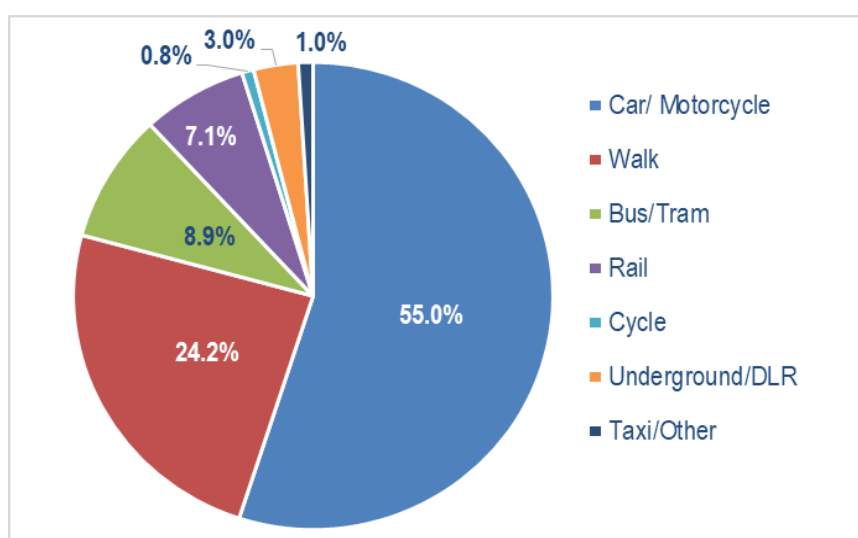
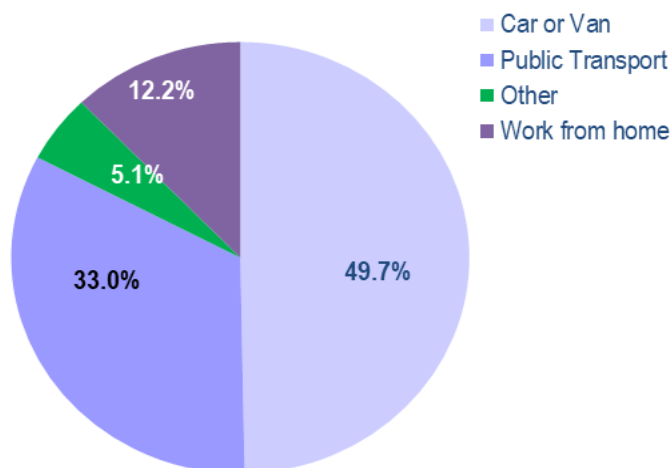


Figure 4.26: Modal share for journeys to work originating in LB Sutton 2017-18 to 2019-20

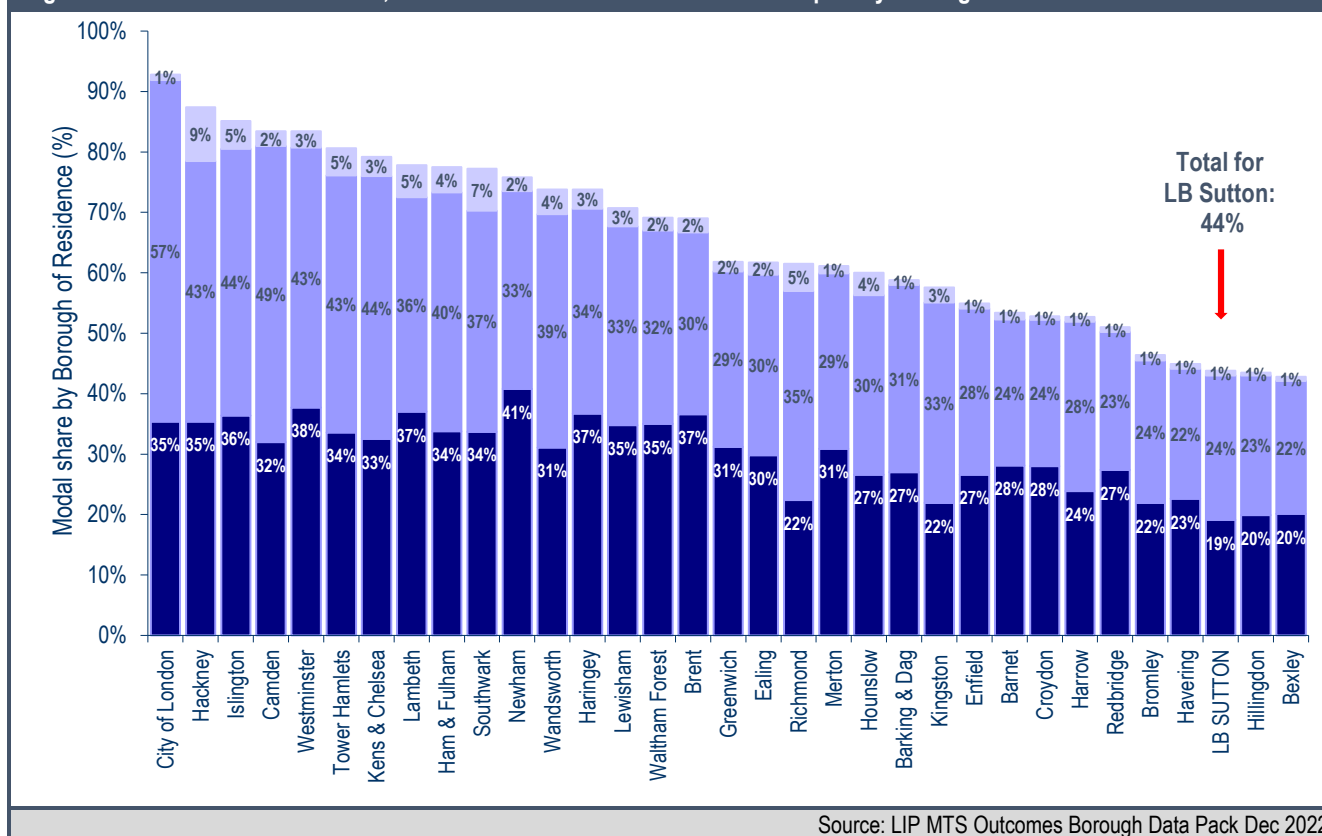


Borough residents taking up active travel

	Percentage of Borough residents doing at least two x10 minutes of active travel a day						
	2015-16 to 2017-18	2016-17 to 2018-19	2017-18 to 2019-20	Annual Change	LIP Target		Target Met
					2021	2041	
LB Sutton	25.0%	27.4%	27.0%	-0.4%	36.0%	70.0%	X
Outer London	26.3%	26.2%	27.2%	+1.0%	n/a	n/a	n/a
London	31.5%	31.6%	33.3%	+1.7%	n/a	n/a	n/a

Source: LIP MTS Outcomes Borough Data Pack Dec 2022

Figure 4.27: Modal share for active, efficient and sustainable modes of transport by Borough of residence 2020



Access to strategic cycle network

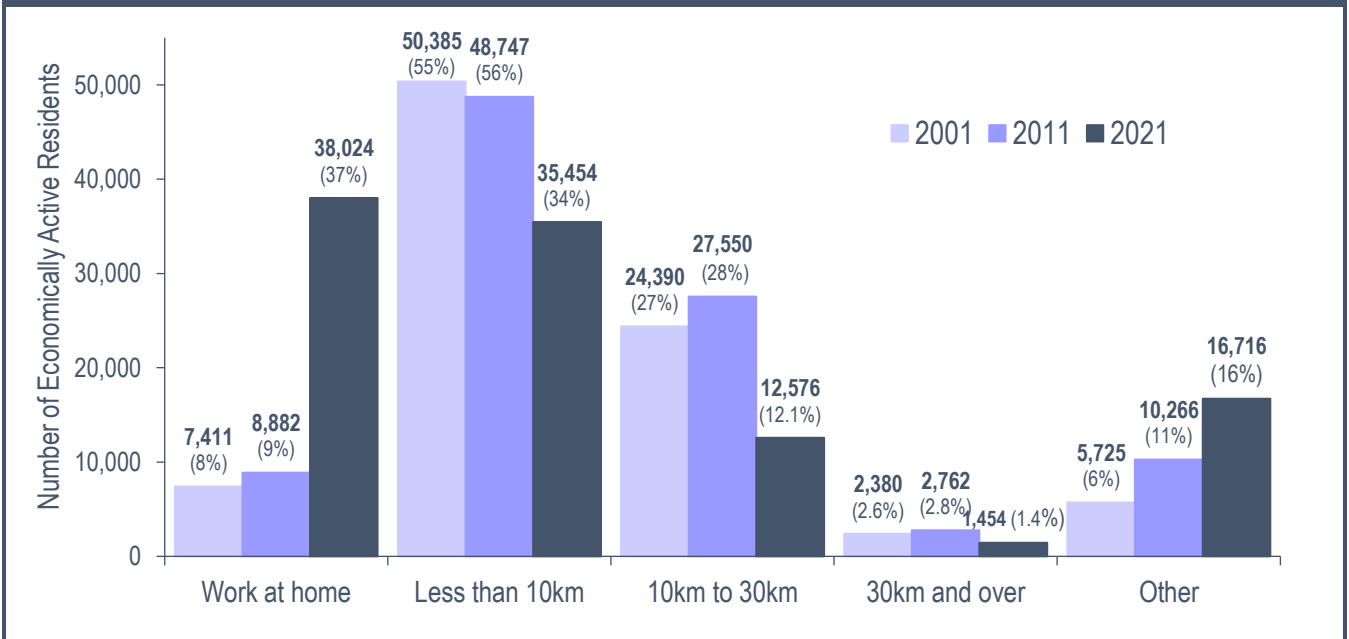
	Percentage of residents within 400m of strategic cycle network ⁹³						
	2020	2021	2022	Annual Change 2021 to 2022	LIP Target		2021 Target Met
					2021	2041	
LB Sutton	0%	0%	0%	0% pts	24%	37%	X
Outer London	8.5%	9.5%	12.3%	+2.8% pts	n/a	n/a	n/a
London	19.7%	21.4%	24.2%	+3.8% pts	26%	70%	X

Source: TfL GIS analysis and Strategic Cycling Analysis

⁹³ Mayor's Transport Strategy TS Outcome 1b: London's streets will be healthy and more Londoners will travel actively. Walking or cycling will be the best choice for shorter journeys Mayor's Transport Strategy measure: 70% of Londoners will live within 400m of the London-wide strategic cycle network by 2041

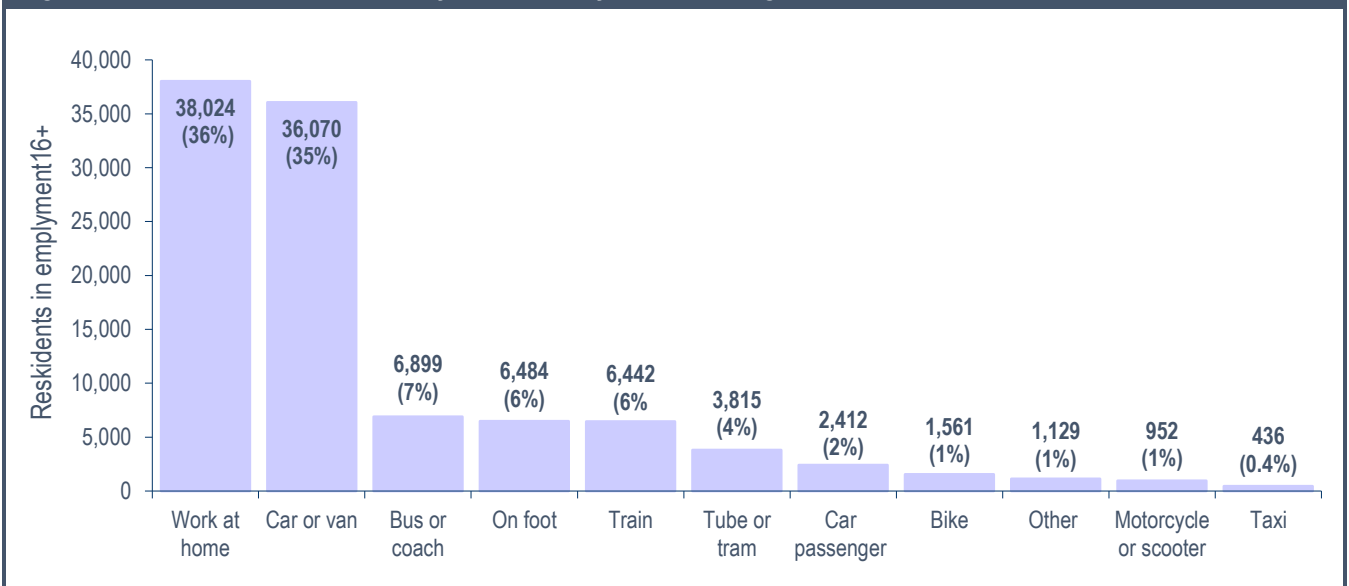
Travel to Work – Changes from Census 2001 to Census 2021

Figure 4.28: Distance of travel to work by economically active Borough residents- Census 2001, 2011 and 2021



Source: Census 2021

Figure 4.29: Mode of travel to work by economically active Borough residents - Census 2021



Source: Census 2021

5. KEY ISSUES AND PROBLEMS (TASK A1)

IDENTIFYING KEY SUSTAINABILITY ISSUES AND PROBLEMS

5.1 In line with Task A3 of the SA methodology set out in Section 2, the Council has identified a range of key environmental sustainability issues which Sutton's new Local Plan must address. These have been derived from many different sources including:

- **key demographic and socio-economic trends** affecting the Borough, including Census 2021 data, long-term population, household, ethnic and employment projections produced by the ONS and the GLA, the increasing demand for school places, health provision and community facilities, employment indicators and social deprivation;
- **changes to Government legislation and the planning policy context** at both national and regional level (i.e. London Plan) as detailed in Section 3 ('Other Relevant Plans, Programmes and Sustainability Objectives') and the revised Scoping table set out in Appendix 1;
- the findings and conclusions of a range of **Borough studies** which have been undertaken in-house or commissioned by the Council as part of the Local Plan evidence gathering stage as set out in Section 4 ('Environmental, Social and Economic Baseline for Sutton');
- **other relevant studies** produced by the Greater London Authority (GLA) and other public bodies, such as the Environment Agency (EA), the Office for National Statistics (ONS), and Greenspace Information for Greater London (GiGL) CIC;
- **ongoing monitoring and review** of the Council's existing planning policies and site allocations in Sutton's Local Plan 2018 in terms of their implementation in development control and their effectiveness in achieving their stated targets and London Plan targets. The Council produces an Authority Monitoring Report (AMR) for this purpose;
- **ongoing engagement** with neighbouring local planning authorities (LPAs) and certain major public bodies and infrastructure regulators to ensure that strategic cross-boundary and regional needs are catered for, where appropriate and possible. This is a legal requirement under the 'Duty to Cooperate'; and
- key **Council Priorities** set out in Sutton's Corporate Plan 2022-27 'Ambitious for Sutton'⁹³, Sutton's Environment Strategy and Climate Emergency Response Plan 2019-2025 and a range of other Council strategies.

5.2 The key environmental sustainability issues set out in the remainder of this chapter form the basis of the Council's proposed SA Framework for the Local Plan set out in Section 6 of this document.

(A) ENVIRONMENTAL SUSTAINABILITY

(1) CLIMATE CHANGE MITIGATION AND ZERO CARBON

Carbon dioxide (CO₂) emissions reduction targets

5.3 The need for the Local Plan to address the causes of climate change and contribute towards the delivery of a 'net zero' carbon borough in line with the aims of Sutton's Climate Emergency Plan by avoiding or minimising both operational and whole-life carbon emissions from all new developments, promoting renewable energy generation and ensuring that any residual on-site emissions are offset through equivalent off-site measures.

5.4 Should the current Local Plan requirement for major residential and commercial developments to demonstrate 'zero carbon' standards through application of the energy hierarchy (be lean; be clean; be green) and carbon offsetting be extended to minor developments?

5.5 What minimum on-site CO₂ reduction targets should be set for major residential developments (>10 dwellings)?

5.6 What minimum on-site CO₂ reduction targets should be set for minor residential developments (<10 dwellings)?

5.7 Should minimum on-site CO₂ reduction targets be set for dwellings created by conversion or change in use?

5.8 Should minimum on-site CO₂ reduction targets be set for minor non-residential developments?

5.9 Should new energy/ carbon requirements be introduced for householder proposals such as residential extensions?

⁹³ Sutton's corporate plan is available at <https://www.sutton.gov.uk/ambitiousforsutton>

5.10 Should Local Plan policies move away from setting percentage reduction targets against the Part L 2021 baseline and instead set absolute targets for energy use intensity (EUI), space heating demand and renewable energy generation as recommended by consultants in the Delivering Net Zero study 2023?

Energy efficiency and demand reduction

5.11 In seeking to apply step 1 of the Mayor's energy hierarchy (*be lean: use less energy and manage demand during operation*), what minimum CO₂ reduction targets should be demonstrated through energy efficiency and demand reduction measures alone for each type of development?

5.12 What minimum improvement in Fabric Energy Efficiency Standards (FEES) should be required over Part L 2021?

5.13 What minimum technical standards should be set in the Local Plan for each of following passive and active design measures? What minimum standards should be set for air tightness; U values for each building element and G values that go beyond minimum Building Regulations Part L 2021 requirements?

5.14 Should the Local Plan require that all proposed school buildings achieve *Passivehaus* standards and what other types of development should set this requirement?

Efficient Energy Supply and Decentralised Energy (DE)

5.15 Should the Local Plan continue to promote DE networks within the Borough by incorporating energy masterplans for suitable areas such as Opportunity Areas (Sutton Town Centre), town centres or other growth areas?

5.16 Should the Local Plan require all major development proposals within Heat Network Priority Areas to be served by a communal low-temperature heating system (e.g. air source or ground source heat pumps)?

5.17 Should the use of gas boilers either serving individual units or as the basis for a combined heat and power (CHP) or communal heat network be ruled out boroughwide? Or under what circumstances if any should the Local Plan allow for the use of ultra-low NOx gas boilers to serve communal or CHP networks outside of Air Quality Focus Areas?

5.18 Should the Local Plan require proposed communal or area-wide heat networks served by gas boilers to be accompanied by a decarbonisation strategy in line with the Council's aim of creating a zero carbon Borough?

Renewable energy

5.19 Should the Local Plan require all developments, including residential conversions and changes of use to maximise renewable energy generation regardless of whether the 35% on-site target has been met?

5.20 Should minimum targets be set for incorporating renewable energy technologies as part of proposed developments in terms of the percentage of their annual energy target to be generated on site or the percentage of roof area covered by renewable technologies? Should the Local Plan consider adopting best practice targets and guidelines developed by the London Energy Transformation Initiative (LETI) or similar?

5.21 Should the Local Plan encourage the combination of biodiverse roofs with roof-mounted renewable technologies such as solar PV?

Post construction monitoring and reporting

5.22 Should the requirement for major developments to 'monitor, verify and report on operational energy performance' at the post construction stage in line with step 4 of the Mayor's energy hierarchy 'be seen' be extended to all developments?

Carbon offsetting

5.23 What carbon price should be set by the Local Plan for the purpose of carbon offsetting? Should this be aligned with the Mayoral price of £95 per tonne over 30 years as amended or should a higher price be set in accordance with the outcome of the updated joint 'Towards Net Zero Study 2023'?

Whole Life-Cycle Carbon⁹⁴

5.24 Which development types should be accompanied by a Whole Life-Cycle Carbon Assessment and be required to demonstrate actions taken to reduce life-cycle carbon emissions?

Environmental Performance Certification Schemes

5.25 Which commercial development types should be subject to a building research establishment environmental

⁹⁴ **Whole life carbon** is formed of two key components: **Operational Carbon**: a new building with net zero operational carbon does not burn fossil fuels, is 100% powered by renewable energy, and achieves a level of energy performance in-use in line with national climate change targets. **Embodied Carbon**: Best Practice targets for embodied carbon are met, and the building is made from re-used materials and can be disassembled at its end of life in line with the circular economy principles

assessment method (BREEAM) New Construction 2018 assessment (as amended) and what minimum performance levels should be required (Outstanding; Excellent; or Very Good)? Should BREEAM targets be extended to major refurbishments? Should the Local Plan incorporate recently-developed best practice benchmarks for zero carbon development for example those published by the London Energy Transformation Initiative the LETI?

Cooling and Overheating

5.26 Should the Local Plan follow the Mayor's cooling hierarchy in London Plan Policy SI 4 or should an amended hierarchy be included?

5.27 Should all developments be required to comply with TM59, TM 52 and TM 49 criteria, not only major developments?

(2) FLOOD RISK AND WATER RESOURCES

Fluvial (river) flooding and flood resilience

5.28 The need to facilitate new housing development over the plan period to meet boroughwide housing needs over the next 10-15 years while ensuring that all proposed developments minimise all sources of flood risk to people and property and, where possible, reduce flood risks overall, taking future climate scenarios into account.

5.29 Which localities within the Borough are subject to significant flood risk issues (now and in the future) from fluvial, surface water, ground water and/or sewer flooding?

5.30 Which developments should be required to be supported by a site-specific flood risk assessment (FRA)?

5.31 Should the Local Plan apply a stronger presumption against proposed development within flood risk areas or against development that would increase risk of flooding downstream?

5.32 Should the Local Plan continue to avoid inappropriate development in flood risk areas in line with the 'sequential' and 'exceptions tests', taking account of government vulnerability classifications and flood zone compatibility guidelines (i.e. continue to apply Government PPG)?

5.33 Should the Local Plan include specific policy requirements for change of use applications located flood risk areas which either involve an increase in flood risk vulnerability and/or increased occupancy, given that such applications are not normally subject to the Sequential or Exception Tests? In such cases, how can Local Plan policies maximise opportunities to improve flood resilience of the existing development or help to mitigate and adapt to the flooding impacts?

5.34 Should the Local Plan include a requirement for developers to undertake a 'sequential approach' to site layout by locating the most vulnerable development within areas of lowest flood risk where possible?

5.35 Should the Local Plan seek to enhance the council's minimum standards for incorporating property level flood resilience measures into new-build and retrofit developments, including residential extensions, in order to improve their resilience against all sources of flood risk taking account of climate change? What sources of current best practice should be used as the basis for setting these minimum standards e.g. CIRIA Code of Practice for Property Flood Resilience⁹⁵

5.36 Should Local Plan policies require the inclusion of flood resistance and resilience plans as part of flood risk assessments (FRA's) and/or SuDS strategies submitted in support of planning applications?

5.37 What further policy approaches are available to ensure that proposed developments located within the floodplain and/or within river catchments 'make space for water', allow improvements and maintenance of land drainage, improve the ecological functioning of river corridors and enhance local amenity (plus a range of other climate adaptation benefits)?

5.38 What further requirements should be included to ensure that developments incorporate 'natural flood management measures' in order to maximise their multiple benefits for habitats, recreational areas, flood storage and urban cooling?

5.39 How can the Local Plan support the aims of the Wandle Catchment Plan, including the need to ensure that water quality meets the standards required for 'good ecological potential' and that water supply in all sections of the river is sufficient to sustain a healthy population of native flora and fauna and is resilient to risk of drought or flood from extreme weather events or management for human use?

⁹⁵ CIRIA's Code of Practice can be accessed here [Code of Practice for Property Flood Resilience](#)

5.40 Should all ‘vulnerable’ developments located within flood risk areas be required to follow the Government’s standing advice relating to surface water management, access and finished floor levels i.e. required by government guidance (PPG)?

5.41 Should basement impact assessments (BIAs) be required in support of all basement developments?

Surface water flooding and sustainable drainage (SuDS)

5.42 How can the Local Plan help to deliver the overarching objectives of Sutton’s Local Flood Risk Management Strategy 2022, including Objective B ‘Proactively encourage sustainable solutions for the management of local flood risk which take account of climate change’ and Objective C ‘Use planning powers to appropriately mitigate flood risk to or caused by developments across Sutton’

5.43 How can the Local Plan further promote sustainable flood risk management practices such as sustainable drainage systems (SuDS), natural flood management (NFM) and property flood resilience (PFR), and to look for opportunities to implement such practices?

5.44 How can Local Plan policies on SuDS and climate adaptation respond to the overarching aims of the National Flood and Coastal Erosion Risk Management Strategy 2020 to ensure that future growth and infrastructure within the Borough are resilient in tomorrow’s climate’?

5.45 How can the Local Plan further promote flood resilient communities in line with the aims of the LFRMP 2022, particularly in areas which have been most affected by historical flooding events – Sutton Town Centre, Worcester Park, Wallington, Cheam, Hackbridge and Carshalton?

5.46 How can Local Plan policies and proposals help to reduce the number of residential and non-residential properties at risk and/or at high risk of surface water flooding, defined as a rainfall event with a 1 in 30 probability of occurring in any given year?

5.47 How can Local Plan policies and proposals help to bring forward the proposed flood alleviation schemes and SuDS initiatives included in Sutton’s updated Borough Surface Water Management Action Plan 2022 including the Worcester Park flood alleviation scheme (FAS), Rosehill FAS, Beddington FAS and the ongoing SuDS in Sutton Schools programme?

5.48 Should the Local Plan strengthen existing policy requirements for proposed developments to achieve greenfield run-off rates and volumes of all storm events up to and including the 1 in 100 year event plus 40% for climate change?

5.49 Should the Local Plan adopt the Mayor’s updated drainage hierarchy set out in London Plan Policy SI 13:

- (1) rainwater use as a resource (for example rainwater harvesting, blue roofs for irrigation)
- (2) rainwater infiltration to ground at or close to source
- (3) rainwater attenuation in green infrastructure features for gradual release (for example green roofs, rain gardens)
- (4) rainwater discharge direct to a watercourse (unless not appropriate)
- (5) controlled rainwater discharge to a surface water sewer or drain
- (6) controlled rainwater discharge to a combined sewer.

Further flood risk issues identified on the basis of policy recommendations set out in the Borough Level 1 Strategic Flood Risk Assessment (SFRA) (METIS consultants, September 2023)

5.50 Should Local Plan policies require that proposed developments located within sub-catchments identified within Sutton’s updated Surface Water Management Plan SWMP 2019 achieve higher SuDS performance standards than elsewhere, for example by requiring a greater volume of storage for on-site attenuation through using SuDS or by restricting runoff rates to greenfield as an absolute maximum?.

5.51 Should the Local Plan take account of the 11 recommendations set out in the draft London Regional Flood Risk Assessment 2018, in particular including Recommendation 2 on ‘Fluvial Flood Risk’ and Recommendation 3 on ‘Surface Water Flood Risk’, which align with the current London Plan Policies SI 12 and SI 13 respectively?

- *Recommendation 2: Planning policies should enhance their focus on maximising the opportunities to reduce fluvial flood risk that are presented by the redevelopment and regeneration of London’s river corridors. Opportunities should align with London Plan Policy SI 12 through maximising the use of open space for flood water, and ensuring the flood compatibility and flood resilience of developments that have a residual flood risk. Opportunities for benefits obtained through river restoration measures should be maximised.*

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- *Recommendation 3: Developments across London should reduce surface water discharge as per the Mayor's sustainable drainage hierarchy outlined in London Plan Policy SI 13. Developments should also take the actions detailed in the London Sustainable Development Action Plan (LSDAP).*

5.52 The need to work collaboratively with the LLFA and the EA to identify strategic locations for flood alleviation schemes and water storage areas in the Borough in order to aid flood risk management objectives, both at present and in the future.

5.53 The need for the new Local Plan to safeguard these strategic locations identified for flood alleviation schemes and water storage areas locations to facilitate links between flood risk management objectives and other environmental priorities

5.54 Should the Local Plan review seek to demonstrate the acceptability of potential windfall developments⁹⁶ at the strategic level as part of the sequential test in order to outline the quantities and locations of windfall sites that would or would not be determined to be acceptable?

5.55 Should the Local Plan include additional policy requirements for surface water flood risk mitigation for proposed developments located *both* within Flood Zone 3a (high risk) and also within the mapped 1 in 30 year (3.3% AEP) surface water flooding extents identified in the Government's 'Risk of Surface Water Flooding (RoFSW) maps? If introduced, should such additional policy requirements be similar to those applying to proposed developments located within Flood Zone 3b as per Table 2 of the Government's planning practice guidance (PPG) on 'Flood risk vulnerability and flood zone incompatibility' with the below modifications::

- development situated within the 1 in 30 year (3.3% AEP) surface water flooding extent will be treated as if it were Flood Zone 3b (Functional Floodplain);
- development may be possible within the 1 in 30 year (3.3% AEP) surface water flooding extent if situated outside of existing infrastructure or solid building footprints.
- development within the functional floodplain may be possible through relocation of a building's footprint within a site where this is beneficial to flood risk and/or other planning requirements and footprint size does not increase.

5.56 Should the Local Plan ensure that all proposed basement dwellings or basements forming part of residential extensions or redevelopment works are not permitted within Flood Zones 3b, 4b and 2 and in line with the recommendations set out in Sutton's SFRA Level 1 Report 2015?

5.57 Should the Local Plan require that a site-specific FRA is prepared in support of planning applications for all basement developments in Flood Zone 1 where there is evidence of flood risk from surface water, groundwater and/or sewer flooding in the area? Should the FRA be required to provide details of proposed flood mitigation measures for these sites which demonstrate that the development will not be impacted by flooding and that the development will not have any adverse impacts on local hydrogeology. Should the FRA be required to include evidence to confirm the local water table level?

5.58 Should further consideration be given to enabling the use of Community Infrastructure Levy (CIL) charges for flood alleviation schemes across the borough to address the cumulative impact of development on flood risk?

5.59 How can the Local Plan develop a strategic approach to flood risk management as part of the Local Plan which is co-ordinated with emerging policy priorities relating to green infrastructure, open space, biodiversity net gain (BNG) and climate change adaptation arising from the Council's Climate Emergency Action Plan, the relevant legislation relating to BNG and strategic policies such as London Plan Policy G1 'Green Infrastructure'?

5.60 The need to ensure that flood mapping from all sources and the impacts of climate change are actively considered as the basis for safeguarding land within development sites for potential flood mitigation use (this can be undertaken during the planning process or as part of the Level 2 SFRA).

5.61 The need to ensure that proposed developments located within 'dry islands' (areas within Flood Zone 1 that are surrounded by areas at higher risk of flooding) such as those in Hackbridge near the River Wandle should be designed for safe access and egress should a flood event occur over the lifetime of the development.

5.62 The need to ensure that proposed developments maximise the use of existing green and open spaces (including those around main rivers and ordinary watercourses) as flood storage areas for water to flow over and be stored within during a flood event.

⁹⁶ windfall sites are those which are not allocated in the Local Plan but which unexpectedly become available for development

Wandle Valley

What potential environmental improvements and opportunities should be prioritised within the Wandle Valley growth corridor over the next 10-15 years? Priorities include:

- creating new public open space and high-quality habitats as part of the restoration of Beddington Farmlands and the delivery of the Wandle Valley Regional Park as metropolitan open land (MOL) and as part of the Mayor's London Green Grid;
- ensuring that Beddington Farmlands is restored according to the relevant planning permissions, Conservation Management Scheme and Restoration Management Plan to become the significant new nature reserve in Wandle Valley Regional Park;
- ensure that Beddington Farmlands provides high quality greenspace, progressively becoming open to the public and high-quality habitats for common and protected species
- maintaining ecological networks and habitat pathways (i.e. green corridors) and incorporating green infrastructure (GI) measures throughout the Wandle Valley corridor including through the implementation of Pocket Parks, SuDS retrofit measures, planting and soft landscaping measures within the public realm and as an integral part of proposed developments and highway improvement schemes;
- managing flood risk at the catchment scale and furthering climate change adaptation objectives such as counteracting heatwaves and the urban heat island (UHI) effect);
- what potential environmental improvements and opportunities should be prioritised within the Wandle Valley growth corridor over the next 10-15 years? Priorities may include (i) working with developers, the EA, Thames Water, the South East Rivers Trust and other stakeholders to improve water quality of the river, in particular lowering levels of phosphates and limiting sewage and road run-off and (ii) promoting restoration opportunities such as re-meandering, bank softening and regrading and installation of woody materials which can present improvements for biodiversity, flow diversity, water quality and flood risk;
- implementing low and zero carbon infrastructure to serve new and existing developments throughout the Wandle Valley including through the extension of the existing decentralised energy network

Water Resources

5.63 Should the Local Plan secure provision of free drinking water as part of major developments?

5.64 How can the Local Plan further minimise the consumption of mains water in new dwellings? Should the existing target of 105 litres per person per day (l/p/d) – aligned with the Optional Requirement of Part G of the Building Regulations - be carried forward or should a more ambitious target of say 80 l/p/d be set.

5.65 The need for the Local Plan to consider the capacity and quality of water supply systems and any impact development may have on the environment, including understanding the supply and demand patterns now and in the future;

5.66 The need for projected water availability to take account of the impact of a changing climate and to work closely with the relevant water supply company (SES Water Ltd) in preparing the Local Plan

(3) OPEN SPACE, URBAN GREENING AND BIODIVERSITY NET GAIN

Strategic open land

5.1 Should the Local Plan give consideration to releasing any areas of land within the Sutton Green Belt or on Metropolitan Open Land (MOL) which are identified as (i) being 'poorly performing' against the relevant NPPF criteria (ii) having boundaries which may need to be redrawn in order to make them more 'defensible'; or (iii) being needed for future development over the plan period and are intended to be allocated for educational or other uses.

5.2 Should the Local Plan maintain the current strong planning policy stance against inappropriate development in the Green Belt and MOL in accordance with national planning policy (NPPF) unless 'very special circumstances' can be demonstrated which clearly outweigh the harm to the Green Belt or MOL?

5.3 Should the Local Plan re-introduce a policy objective to maintain green chain linkages throughout the borough?

5.4 What additional sites should the Local Plan consider safeguarding for further gypsy and traveller provision within the Borough in order to meet additional demand over the plan period ?

5.5 Should the existing size limit on proposed extensions and/or alterations to existing buildings or structures within the Green Belt or MOL be reduced, kept the same or increased?

Public open space

5.6 How can the maintain or enhance the provision of public open space throughout the Borough? Options include:

- maintaining the existing per capita level of open space provision of 2.51 ha per 1,000 population by requiring all developments in areas of open space deficiency to provide new open space and/or contribute towards the provision of new open spaces or improvements to the accessibility and quality of existing public open space?
- maintaining the existing absolute amount of public open space within the Borough at 519.45 ha over the next 10-15 years regardless of the increase in population by preventing its loss to development?

5.7 The need for the Local Plan to protect and enhance 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.

5.8 Should the Local Plan continue to require that additional children's play space be provided as part of major residential developments where a need is generated?

5.9 Should the Local Plan prioritise the creation of community managed allotments and food growing spaces as part of major new developments?

Green infrastructure (GI)/ Urban greening

5.10 How can the Local Plan deliver a greener borough which is fully adapted and resilient to climate impacts, including heatwaves, flooding and drought conditions;

5.11 How can the Local Plan help to deliver the Council's Environment Strategy target for "*More than half of Sutton's space will be green space*" ?

5.12 Which strategic green infrastructure (GI) priorities should be promoted by the Local Plan and how can their multi-functional benefits for local amenity, recreation, wildlife and habitats, sustainable drainage (SuDS), river catchment management and urban cooling be maximised? e.g.

- developing a GI strategy for Sutton Town Centre?
- developing GI strategies for district centres, employment areas and other areas of growth and regeneration?
- the ongoing restoration of Beddington Farmlands as part of the Wandle Valley Regional Park?
- improving land along the River Wandle for biodiversity, flood risk management, access, river quality and amenity?
- enhancing existing open spaces and other priority GI assets?
- protecting green corridors, biodiversity linkages and continuous blocks of backgarden land in residential areas?

5.13 Should the Local Plan seek to incorporate a Borough-wide strategy for the provision of 'Pocket Parks' and what criteria should be used to identify suitable locations? Options include identified areas of deficiency to open space; areas of deficiency to nature conservation sites; surface water flooding 'hotspots'; 'areas vulnerable to heatwaves and the urban heat island (UHI) effect; areas with a higher proportion of residents vulnerable to climate impacts; air quality focus areas (AQFAs)

5.14 How can the Local Plan promote the benefits of green infrastructure (GI) throughout the borough for urban cooling, local amenity, biodiversity, SuDS, carbon sequestration, healthy streets objectives and mitigating air pollution as part of area renewal, new development, highway/transport improvements, flood alleviation schemes and SuDS retrofit measures?

5.15 Should the Local Plan continue to require major developments undertake a green space factor (GSF) assessment and demonstrate at least a 10% improvement compared to baseline conditions? Or should the Local Plan adopt the Mayor's Urban Green Factor?

5.16 Should all developments be required to incorporate biodiverse green roofs where feasible?

5.17 How can the Local Plan support the aims of the Sutton's Environment Strategy and Climate Emergency Response Plan 2019-25 by ensuring that all new developments are fully adapted to climate impacts by integrating blue and green space adaptation and other cooling measures from the earliest stages of project planning and design and to promoting urban greening measures and wider green space links across the borough?

5.18 How can the Local Plan address the significant health inequalities within the population (brought into focus by the COVID-19 pandemic) and the fact that extreme weather events driven by climate change, such as heatwaves and floods, have a disproportionate impact on vulnerable groups, such as the elderly, the young and people with health conditions revealed that many and these are likely to be exacerbated by climate change)

5.19 Should the Local Plan go further in promoting the role of urban greening, SuDS and other climate adaptation measures as part of new developments, estate regeneration, wider urban renewal programmes, highway improvements and other public realm interventions?

5.20 Should the Local Plan go further in requiring developers to make increased use of planting, green biodiverse roofs, SuDS measures and other 'nature-based solutions' as part of the design and layout of new buildings to the creation of wider green infrastructure linkages and flood risk management measures both at the neighbourhood/catchment scale and over wider areas?

5.21 How can Local Plan policies for urban greening take account of the 'healthy streets' principle, which has been progressed by the Mayor in order to create a less polluted public realm that is designed more for people than for vehicles?

5.22 How can the Local Plan maximise the multiple benefits of urban greening measures 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;

5.23 How can Local Plan policies ensure that proposed developments located adjacent to main rivers contribute to the improvements outlined above for the River Wandle (for biodiversity, flood risk management, access, river quality and amenity) through river enhancement and restoration?

Nature conservation sites

5.24 What opportunities exist for creating new or enhancing existing wildlife habitats within the Borough, including Sites of Importance for Nature Conservation (SINCs), and maximising their benefits for species retention, flood alleviation, pollution amelioration, environmental quality, human health and quality of life?

Green corridors and linked habitats

5.25 What Local Plan policies are required to preserve and enhance green corridors/ biodiversity linkages and areas rich in biodiversity and areas which promote vulnerable or rare species?

5.26 How can the Local Plan establish and maintain coherent ecological networks that are more resilient to climate impacts (i.e. green corridors, promote the enhancement of priority habitats and ecological networks and; pursue wider opportunities for securing measurable net gains for biodiversity)?

5.27 How can the Local Plan promote the role of back gardens, especially those forming part of continuous blocks and green corridor, for biodiversity, habitats, quality of life, local character and a range of climate adaptation objectives? Should the level of protection be stronger outside of town centres and within the Borough's suburban heartlands?

Local nature recovery strategy, biodiversity action plan (BAP) and tree planting

5.28 How can the Local Plan actively support the following habitat creation schemes which are identified in the Council's Climate Emergency Action Plan/ Environment Strategy/BAP (and the Local Natural Recovery Strategy⁹⁷ when introduced):

- support the delivery of River Wandle and Beverly Brook Catchment Plans to achieve Water Framework Directive targets
- deliver the Council's Biodiversity Strategy and Action Plan (BAP)
- monitor and advise on the creation of new wildlife habitat through the restoration of Beddington Farmlands.
- plant 2,000 trees each year.

5.29 The need to work with Transport for London, the EA, Sustrans, Thames Water, The London Wildlife Trust, the Wandle Valley Regional Park Trust, Groundwork London and the South East Rivers Trust to (i) Improve the water quality of the river, in particular lowering levels of phosphates and limiting sewage and road run off (ii) expand the network of walking and cycling routes including the Wandle Trail (iii) Achieve good ecological potential for the River Wandle by 2027.

⁹⁷ the LNRS covering LB Sutton will be produced on a London-wide scale - <https://www.london.gov.uk/programmes-strategies/environment-and-climate-change/parks-green-spaces-and-biodiversity/local-nature-recovery-strategy>

Biodiversity net gain (BNG)

- 5.30** How should the Council's existing planning policy requirements on BNG be carried forward and amended for inclusion in the new Local Plan in the context of the introduction of mandatory BNG from February/April 2024?
- 5.31** How can the Local Plan approach to BNG be sufficiently flexible to ensure that each planning application is assessed on a case-by-case basis to determine the 'best ecological outcome' in accordance with the aims of LB Sutton's biodiversity strategy (onsite habitat creation, offsite habitat creation or both according to the specific circumstances)?
- 5.32** How can the Local Plan approach to BNG achieve a balance between creating potentially better compensatory habitats in larger areas such as parks (large areas of habitat are likely to be more resilient to disturbance and support a greater variety of species than smaller, fragmented and highly disturbed habitats) while avoiding the wholesale loss of backgarden land and their important role in providing connectivity for mobile species?
- 5.33** How can the Local Plan's approach to BNG support and be aligned with Sutton's local nature recovery strategy and biodiversity strategy objectives? Should the Local Plan prioritise BNG to be delivered on site in all circumstances or should the Local Plan recognise that this may be onerous for small developers and lead to only fragmented gains in habitat?
- 5.34** Should Local Plan BNG targets aim to go beyond the mandated 10% uplift in biodiversity value required in legislation (for development sites impacting >25 m² of vegetation)⁹⁸? Or, should the targeted uplift in biodiversity value vary according to urban typology or character area? (e.g. higher in town centres, lower in residential heartlands)?
- 5.35** How should BNG requirements for areas such as Sutton Town Centre with zero biodiversity value (where the mandated 10% improvement would have no effect)? Should an area-based % target or minimum unit score be set?
- 5.36** How can BNG policies be coordinated with an update to the urban green factor (UGF) and/or green space factor (GSF) in order to maximise greening in town centres (again where the mandated 10% improvement would have no effect)?
- 5.37** How can BNG be coordinated with neighbouring boroughs to enhance strategic habitat linkages/ green corridors?
- 5.38** What level of baseline information and BNG guidance should be made available to developers and should it be included as part of a supplementary planning document (SPD) (or supplementary plan – the Government's proposed replacement for SPDs), a design code, a technical guidance note or in the Local Plan itself? Should the Local Plan require developers to submit BNG plans for approval prior to the start of construction in line with a planning condition?
- 5.39** The need to bring together all necessary information on how to undertake BNG plans; what is required by the Local Plan policy; habitats and species important to LB Sutton (see Appendix 5 of LBS Biodiversity Strategy); ecological design advice as the basis for developing design codes; templates for BNG Feasibility, BNG Design Stage and BNG Audit Reports⁹⁹; and standards for features for wildlife; landscaping and green infrastructure (GI) standards; uplift values and strategic significance (Local Nature Recovery Strategies); and data standards (e.g. for GIS shapefiles etc).
- 5.40** Should LB Sutton aim to be a key biodiversity offset provider within the south London context? Or should the Council seek to rely on other landowners to deliver the necessary biodiversity units offsite (e.g. through legally-binding conservation covenant or planning obligation (s106) to maintain the biodiversity enhancement for at least 30 years after the completion of the works)? What planning mechanisms would need to be used? (Section 106, unilateral undertaking, covenant etc)?
- 5.41** The need to ensure that biodiversity tariffs are reviewed to achieve full cost recovery over the 30 year period and to ensure that statutory credits are only purchased by developers as a last resort if offsetting is not possible on Council land.
- 5.42** The need for the Local Plan to ensure that developers do not overlook the potential ecological impacts of planning applications by ensuring that a much higher proportion of proposed developments are accompanied by a biodiversity data search; and to make developers aware of the facility provided by GiGL. (although around 18% of planning applications in London in 2016 should have been supported by a biodiversity data search, only 1% were accompanied by a GiGL data search report).
- 5.43** Should mandatory requirements be introduced requiring developers share biodiversity data and ecological surveys.

⁹⁸ some local planning authorities have gone beyond the mandated 10% uplift e.g. Kent County Council (20%) and RB Kingston (30%)

⁹⁹ CIEEM (2021). Biodiversity Net Gain Report and Audit Templates Chartered Institute of Ecology and Environmental Management (CIEEM) – see <https://cieem.net/resource/biodiversity-net-gain-report-and-audit-templates/>

Backgarden land

5.44 LB Sutton has the highest percentage of land area accounted for by back garden land (33%) amongst the 33 London Boroughs. Given the value of backgarden land for biodiversity, maintaining linked habitats, local amenity, sustainable drainage (SuDS), urban greening and counteracting the urban heat island (UHI) effect, should there be a general policy presumption against the development of backgarden land?

5.45 Alternatively, should the Local Plan set a Borough-wide target for the delivery of additional dwellings from small sites and infill developments within residential areas (including on backgarden land) ?

5.46 Should the Local Plan's approach to backgarden development take account of the residential setting and the location of the site, by allowing backgarden development in town centres and the surrounding areas of potential intensification but limiting it in the remainder of the borough (i.e. currently called the 'suburban heartlands' in the existing Local Plan)

5.47 What criteria should be considered when considering proposed backgarden developments? Potential criteria include:

- the residential setting and location of the site – is it located within the suburban heartlands?
- the character and appearance of the area;
- the biodiversity value of the site, both individually and as part of a larger block, and its role in maintaining biodiversity linkages/ green corridor;
- location in relation of Areas of Deficiency (AoD) to nature conservation
- mitigating the impacts of climate change/ counteracting the UHI effect;
- residential amenity for occupiers and those currently occupying adjoining or nearby properties;
- potential loss of sustainable drainage (SuDS) and soft landscaping.

5.48 The need to maximise the contributions made by back gardens to quality of life, amenity and recreational value and outlook, their ecological function and their contribution towards the suburban character of the borough. :

5.49 The need to promote green space linkages and ecological corridors/ pathways in areas where gardens and communal amenity green spaces in the borough combine with adjacent gardens to form green corridors. :

(4) SUSTAINABLE TRANSPORT, HEALTHY STREETS AND AIR POLLUTION

Reducing the need to travel

5.50 The need for the Local Plan to shape the future growth and development of the borough in ways which:

- reduce the need to travel;
- facilitate residents making shorter, regular trips by walking or cycling; and
- direct travel generating developments and higher residential densities towards locations well-served by public transport and within easy walking distance to railway stations, bus routes, shops and community facilities

Reducing car trips promoting active and healthy modes of travel

5.51 How can Local Plan policies help to achieve the Mayor's strategic target for outer London of 75% of all trips in the Borough to be made by foot, cycle or public transport by 2041?

5.52 How can the Local Plan ensure that proposed developments are well connected by existing and future public transport, walking and cycling routes; and ensure that adverse impacts on the Borough's transport networks and supporting infrastructure are mitigated?

5.53 The need for development proposals to be permeable by foot and cycle and connect to local walking and cycling networks as well as public transport?

5.54 How can the Local Plan reduce car dependence by securing new investment for improved transport infrastructure serving Sutton Town Centre, the district centres, local centres and residential area?

5.55 Should the Local Plan continue to require developers to produce and implement green travel plans and introduce car clubs as part of new development?

5.56 How can the Local Plan ensure that new housing is directed towards areas within easy walking distance of railway stations and bus services to ensure more people have the facilities and services they need within walking or cycling distance?

5.57 Should the Local Plan continue to safeguard the Tramlink (Sutton Link) route and other future transport infrastructure in order to support future housing growth, provide strategic and local connectivity and enhance public transport capacity?

5.58 The need for the Local Plan to deliver improved walking, cycling and public transport networks within Sutton Town Centre and other areas of growth and regeneration (e.g. district centres)

5.59 The need to require transport impact assessments (TIAs) to be submitted in support of development proposals to ensure that impacts on the capacity of the transport network (including impacts on pedestrians and the cycle network), at the local, network-wide and strategic level, are fully assessed.

5.60 Should the Local Plan go further in promoting car-free developments in locations well served by public transport?

Healthy streets

5.61 How can the Local Plan help to ensure that future growth and development incorporate 'healthy streets' principles in line with the aims of Sutton's adopted Sustainable Transport Strategy 2021?

5.62 How can the Local Plan help to ensure that the following objectives are integral to design and layout of proposed developments (a) enhance accessibility and inclusivity (b) reduced car dominance (c) improved road safety (d) improved street safety, comfort, convenience and amenity.

5.63 In what ways can Local Plan policies and proposals contribute towards the following ten 'healthy streets' indicators?

- clean air
- people feel relaxed
- things to see and do
- not too noisy
- people choose walking, cycling & public transport
- people feel safe
- shade and shelter
- places to stop and rest
- pedestrians from all walks of life
- easy to cross

Electric Vehicles

5.64 The need to secure the delivery of electric vehicle charging infrastructure in appropriate locations

Air Quality

5.65 The need for the Local Plan to improve local air quality throughout the Borough and reduce public exposure to poor air quality in Air Quality Focus Areas (Sutton TC, Wallington, Worcester Park) and elsewhere e.g Rosehill roundabout.

5.66 How can the Local Plan ensure that proposed developments do not (i) lead to further deterioration of existing poor air quality (ii) create any new areas that exceed air quality limits

5.67 What types of development should be supported by Air Quality Assessments?

5.68 What types of development should be required be 'air quality neutral' or 'air quality positive', based on the Mayor's adopted benchmarks?

5.69 The need for the Local Plan to ensure that where it can be demonstrated that emissions cannot be further reduced by on-site measures, off-site measures are implemented to improve local air quality (through planning obligations)

5.70 How can the Local Plan seek to mitigate the impacts of local air pollution arising from both the operation and associated transport movements arising from new developments, particularly in parts of the Borough where national standards for particulates (PM10) and nitrogen oxides (NO_x) are being breached?

5.71 Should gas boilers be ruled out by the Local Plan as the basis for individual, communal or CHP systems or should gas boilers only be ruled out within identified air quality focus areas?

(B) SUSTAINABLE ECONOMIC GROWTH

(5) TOWN CENTRES

Sutton Town Centre

5.72 How can the Local Plan to address the challenges and opportunities faced by Sutton Town Centre over the next 10-15 years to deliver the Council's vision of "creating a vibrant, attractive and sustainable town centre with great shopping, culture and food, modern flexible office space and good quality affordable housing" consistent with the Council's Zero Carbon and Climate Emergency Action Plan objectives?

5.73 To what extent should the Local Plan prioritise the delivery of each the following long-term strategic projects indented in the Sutton Town Centre Masterplan?

- transforming the St Nicholas centre and deliver comprehensive redevelopment of the the Civic Centre;
- create a distinctive South London destination with culture, leisure and residential activity;
- implement transport and highway improvements in line with Healthy Streets principles;
- create a new residential neighbourhood at the north (estate renewal);
- further enhancing employment opportunities at and around Sutton railway station;
- transform the gyratory with more active frontages onto St Nicholas Way and Throwley Way; and
- protect and enhance the Heritage Action Zone etc

5.74 The need to ensure that existing and future developments within Sutton Town Centre are supplied by decentralised energy networks served by zero or low carbon energy sources in line with the council's net zero carbon ambitions.

5.75 The need to develop a GI strategy for the town centre, including through SuDS retrofit, planting, green roofs and other urban greening measures etc to deliver benefits for quality of life, townscape, cooling and other climate adaptation.

5.76 What proportion of additional housing should be delivered within Sutton Town Centre and its surrounding are of potential intensification (API) over the plan period and what proportion should consist of family housing?

5.77 Should the Local Plan continue to promote the renewal of the following housing estates provide that sufficient transport and community infrastructure can be implemented to support their redevelopment:Chaucer Estate, Benhill Estate, Rosebery Gardens, Collingwood Estate, and Sutton Court? What sustainability principles should guide their redevelopment?

5.78 How can the Local Plan enhance the vitality, viability and attractiveness of the borough's town centres and local centres, ensuring that they have a good range of high quality shops, good transport links and an enhanced cultural offer within an improved high street environment.

District centres

5.79 How can the Local Plan promote the vitality and viability of the borough's network of district centres and local shopping parades by ensuring that they have a good range of high quality shops and community facilities and by enhancing the quality of the public realm?

5.80 How can the Local Plan help each of the Borough's seven district centres meet the following future challenges?

- adapt to changing retail trends, such as the increase in internet shopping?
- provide office space that is suitable for modern-day working and attractive to business?
- attract more services to the centres, such as health centres and crèches?
- the need to meet boroughwide housing need (what proportion of additional dwellings within each district centre?)
- improving the quality of the public realm

5.81 Is there a need for a green infrastructure (GI) strategy be developed for each district centre as part of the Local Plan?

5.82 Is there a need for a biodiversity net gain (BNG) target be developed for each district centre?

5.83 Is there a need for a SuDS retrofit strategy be developed for each district centre/ or locality within the Borough?

5.84 To what extent should the Local Plan promote 'healthy streets' principles and promote active travel choices in district centres and other localities as part of highway/ transport improvements in line with Borough Sustainable Transport Strategy?

Retail floorspace

5.85 How much retail and food and beverage floorspace should be planned for in order to meet Borough needs over the next 10-15 years?

5.86 How can the Local Plan respond to the challenging environment for town centres and retail outlets, including the effects of the pandemic and the continued growth of online retail sales (for both convenience and comparison shopping).

5.87 Should a more flexible approach to town centre development be taken to enable town centre uses other than shops to locate in town centres?

5.88 What level of future retail provision should be planned for in Sutton Town Centre and each of the district centres, taking account of:

- projected retail gross floorspace demand over the next 10-15 years set out in the Council's Town Centre & Retail

Need Assessment 2023; and

- the need to meet the identified need for additional housing over the Plan period (886 net additional dwellings per annum) over and above the London Plan target of 469 net additional dwellings per year over 10 years;
- the proportion of future housing growth to be accommodated within Sutton Town Centre and each of the Borough's seven district centres and their associated areas of potential intensification (APIs);
- in seeking to promote the vitality and viability of the Borough's town centres,?

5.89 How can the Local Plan resist the loss of retail floorspace to other uses particularly within primary retail frontages?

5.90 What Local Plan options exist to limit loss of retail floorspace within town centres given the changes to permitted development rights and the Use Classes Order?

5.91 Should the Local Plan seek to develop and incorporate the following environmental sustainability strategies for Sutton Town Centre and each of the Borough's seven district centres?

- a green infrastructure (GI) strategy and setting an area-wide green space factor target?
- biodiversity net gain (BNG) strategy and setting an area-wide BNG target?
- a SuDS retrofit strategy to address SuDS retrofit opportunities and surface water flooding hotspots; and
- a strategy for pocket parks and urban greening measures within the public realm.

(6) INDUSTRIAL LAND AND EMPLOYMENT

Employment locations

5.92 How much additional industrial floorspace should be safeguarded or designated in the Local Plan in order to meet the requirement to accommodate for 167,000 sq.m. (or 8,338 sq.m. per annum) of industrial floorspace or 26 ha based on the Employment Land and Economic Needs Assessment (ELENA) (2023) given the finite amount of existing land that could be intensified and a lack of suitable options for new industrial space?

5.93 To what extent should additional industrial floorspace be delivered through the intensification or reconfiguration of existing employment sites and premises?

5.94 Should the boundaries of existing strategic industrial locations (SILs) or of established industrial areas be extended or new industrial areas designated if necessary to accommodate future demand for industrial floorspace?

5.95 Should the Local Plan continue to protect SILs and Established Industrial Areas against loss of employment land to other non-industrial uses including housing, trade outlets or retail warehousing;

5.96 Should loss of employment land to other non-industrial (& non-waste) uses be permitted under some circumstances?

5.97 If the need for additional industrial floorspace is identified, should consideration be given to de-designating some metropolitan open land (MOL) at Beddington Farmlands – where it does not fulfil the functions and positive objectives of strategic open land – and incorporating these areas as part of the Beddington SIL?

5.98 Should the Local Plan continue to promote the intensification of employment uses within Beddington SIL for example by introducing a job density requirement for permissions in industrial areas to provide 1 job per 40m² of floorspace or denser where there is scope for promoting the circular economy or a more land-efficient distribution of industries?

Offices

5.99 How much additional gross office floorspace should be safeguarded or designated in the Local Plan in order to meet the requirement to accommodate for 167,000 sq.m. (or 8,338 sq.m. per annum) of industrial floorspace or 26 ha based on the Employment Land and Economic Needs Assessment (ELENA) (2023).

5.100 How can the Local Plan create opportunities for new businesses to relocate within the borough, promote green business, develop the circular economy; and improve the quality of the business environment?

(7) LONDON CANCER HUB (LCH) AND SUTTON LINK

London Cancer Hub

5.101 How can the future potential of the London Cancer Hub (LCH) as part of the London-Oxford-Cambridge 'Golden Triangle' of medical research and development be maximised?

5.102 How can the Local Plan further unlock growth in the life sciences sector and create high-value employment opportunities within the London Cancer Hub and throughout the borough working in partnership with local education providers, the health/R&D sector and the Innovation Gateway

5.103 Should the London Cancer Hub (LCH) site continue to be safeguarded for:

- a new local hospital;
- other medical facilities associated with the Royal Marsden;
- creating new medical/ scientific research and development companies;
- further education facilities (secondary school already built out on LCH site); and/or
- ancillary uses including retail, community uses, patient hotel/ accommodation.

5.104 What is the potential for the LCH site to secure better transport links; develop better cycling and pedestrian facilities; apply 'healthy streets' principles; create an attractive environment for employees, patients and for the local community; accommodate green infrastructure (GI) and deliver biodiversity net gain (BNG) across the site? Should any part of the LCH site be used for new housing?

5.105 How can the future development of the LCH site be planned to maximise the use of decentralised energy networks served by low or zero carbon energy sources in line with the Council's ambitions for creating a net zero carbon borough?

5.106 How can the LCH site will support the Council in delivering against its Climate Emergency objectives?

Sutton Link/Tramlink

5.107 Should land continue to be safeguarded for the planned extension of Tramlink from the Borough boundary with LB Merton to Sutton Town Centre and from Sutton Town Centre to Belmont/ London Cancer Hub?

5.108 What level of housing and commercial growth is sustainable over the next 10-15 years with or in the absence of the proposed Tramlink (Sutton Link) extension?

5.109 Should the Local Plan promote an alternative public transport scheme such as Sutton Link?

5.110 Should the Local Plan continue to support the Crossrail 2 extension and improved transport linkages to Sutton Town Centre and other Borough destinations?

Area renewal

5.111 How can the Local Plan support the delivery of area renewal programmes, new Council housing, estate regeneration and the Council's decarbonisation programme for existing social housing in line with zero carbon, and sustainability principles?

(8) SUTTON'S GREEN ECONOMY

5.112 How can the Local Plan go further to promote the circular economy, green jobs and life sciences within the Borough in accordance with the Mayor's Environment Strategy and Sutton's Climate Emergency Action Plan?

(C) SUSTAINABLE COMMUNITIES

(9) HOUSING

Housing growth

5.113 How much housing growth should the Local Plan plan for over the next 10-15 years above and beyond the Mayor's minimum Borough target of 469 net additional dwellings per year set out in the London Plan 2021;

5.114 How can the Local Plan meet the Borough's identified housing needs over the next 10-15 years (886 net additional dwellings per annum based on the National Calculation Method and the projected growth in households to 2034) while ensuring that future housing growth meets the social, economic and environmental aims of sustainable development??

5.115 How should the Local Plan interpret and take forward the Mayor's six 'Good Growth' objectives in the context of Sutton as an outer London suburban Borough?: GG1 Building strong and inclusive communities; GG2 Making the best use of land; GG3 Creating a healthy city; GG4 Delivering the homes Londoners need; GG5 Growing a good economy; GG6 Increasing efficiency and resilience?

5.116 How can the Local Plan allocate sufficient sites to meet housing needs over the next 10-15 years while avoiding

adverse impacts on the suburban character of the borough and accommodating other development needs such as for industry and employment?

5.117 How can planned housing growth be accommodated while at the same time protecting Green Belt, Metropolitan Open Land, public open spaces, ecological corridors established suburban housing areas and river catchments?

5.118 How can the Local Plan meet the London Plan target for delivering additional dwellings on small sites (Sutton's target is set at 268 ndpa or 2,680 over a 10 year period)?

5.119 To what extent can future housing growth be accommodated by promoting higher residential densities within Sutton Town Centre, the Borough's district centres and other sustainable locations with good access to public transport and other local services while respecting the suburban character of the Borough?

5.120 To what extent can future housing growth be accommodated by retaining or extending existing areas of taller building potential within Sutton Town Centre and each of the Borough's district centres while maintaining and enhancing townscape quality and the setting of heritage assets?

5.121 How can future housing growth over the plan period be distributed sustainably throughout the Borough?

- focus most housing growth within Sutton Town Centre; enable some housing growth within the Borough's district centres; and allowing only a limited level of development within the 'suburban heartlands'?
- focus most housing growth within Sutton Town Centre and the respective district centres of Wallington and Hackbridge; enable some housing growth within the Borough's other district centres and again allowing only a limited level of development within the suburban heartlands as part of a 'multi-centered' strategy;
- focus most housing growth within Sutton Town Centre and also allow significant development within each of the borough's district centres and across the remainder of the Borough as part of a 'dispersed' strategy.

5.122 To what extent can additional housing over the next ten years be delivered on smaller sites as part of infill or backgarden developments within existing residential areas, having regard to the relevant Mayoral targets?

Affordable Housing

5.123 The need to meet the Borough-wide need for affordable housing and Sutton's share of the London-wide need while balancing other issues linked to overall housing delivery, the balance of major sites and small sites delivery in the borough, and development viability?

5.124 What proportion of affordable housing should developers be required to provide on large housing schemes? Options include:

- requiring 35% of dwellings to be affordable in line with the current Local Plan
- requiring a higher proportion

5.125 Should the Local Plan require in-lieu payments for affordable housing on proposals of less than 10 units?

5.126 What should be the proportions of affordable housing for social//affordable-rented properties and intermediate housing (tenure split)?

5.127 What considerations should the council take into account when negotiating on individual or mixed use schemes?

- individual site costs.
- economic viability
- the availability of public subsidy
- any other scheme requirement?

5.128 Under what circumstances if any should Local Plan policy allow for the provision of affordable housing off-site?

(10) SOCIAL INFRASTRUCTURE/ COMMUNITY FACILITIES

Education

5.129 Given that the following allocated sites in the current Local Plan have yet to be developed for new schools, is there a need for any additional sites to be identified for educational uses?

- Rosehill (Site Allocation S98)

- The Secombe Theatre and church (Site Allocation STC10)
- Sutton West Centre, Sutton (Site Allocation STC4)

5.130 Are any further locations suitable for developing new secondary and primary schools in the longer term?

Health

5.131 The need to plan for the necessary hospital provision and other health facilities to meet the needs of the Borough's ageing population over the next 10-15 years and to improve access to healthcare facilities for Borough residents.

5.132 Should the Local Plan continue to safeguard land at the London Cancer Hub (LCH) site for the proposed Sutton Specialist Emergency Care Hospital (SECH)?

5.133 Should the Local Plan require new hospital and other healthcare buildings to demonstrate exemplary sustainable design and construction standards and if so which standards should apply?

- *Passivehaus* certification;
- Zero carbon operational emissions i.e. 100% reduction in CO₂ emissions compared to Part L 2021;
- best practice values for energy use intensity (EUI) and space heating demand.
- Building Research Establishment Environmental Assessment Method (BREEAM) 'Outstanding';
- compliance with London Energy Transformation Initiative (LETI) criteria;
- others?

Social, community and cultural infrastructure

5.134 How can the Local Plan ensure that the expected growth in population and households over the next 10-15 years is supported by high quality social, community and cultural infrastructure including sports and leisure facilities, theatres, cinemas, libraries, meeting halls and public houses?

5.135 How can the Local Plan promote the role of cultural facilities in supporting the vitality and viability and the night-time economy of Sutton Town Centre and other town centres?

(11) GOOD DESIGN, TOWNSCAPE, LOCAL CHARACTER AND HERITAGE

Good design

5.136 How can the Local Plan ensure that new development delivers a high quality of design and layout that respects local character, reinforces local distinctiveness and makes a positive contribution to the streetscene, particularly in areas of higher-density development, having regard to the outcome of the updated Borough characterisation study?

5.137 What additional Local Plan policies are required in relation to the design and layout of small sites in order to enable more of these sites to come forward for residential uses without adversely affecting local character and the streetscape?

5.138 Should potential site allocations for inclusion in the Local Plan seek to include greater detail on design matters?

5.139 How can the Local Plan form the basis for the development of future Design Codes on built design?

5.140 What factors should be taken into account in assessing the design and layout of proposed developments?

- architectural detailing and the use of high-quality materials;
- scale, massing and height in relation to the setting;
- the need to be inclusive and accessible;
- the need to design out crime and anti-social behaviour
- the relationship with natural features, existing trees, hedges, other landscape features and local amenity;
- the need to create attractive, functional and clearly defined public and private space
- impact on Green Belt and MOL and on local and strategic views;
- Conservation Area and ASLC character appraisals and management plans as appropriate
- achieving intensification and higher residential densities while meeting space standards and retain a human scale

5.141 To what extent should contemporary designs be encouraged or permitted and what criteria should be included in Local Plan Policies to assess them?

Local character, townscape quality and residential amenity

5.142 How can the Local Plan ensure that proposed residential developments respect the positive features of Sutton's

character, reinforcing local distinctiveness and a sense of identity?

5.143 The need to deliver new dwellings at sufficient densities to meet housing needs while maintaining suburban character, enhancing townscape, minimising impacts on the local road network and increasing the supply of family homes?

5.144 How far should the Local Plan promote the intensification of residential areas in different parts of the Borough, taking the findings of the updated Borough Characterisation Study 2023 (Suburban, Urban, Central)?

5.145 Should policies be strengthened to further protect and enhance the amenities of residents in adjoining properties?

5.146 What criteria should be taken into account by the Council when assessing the impact of the proposed development on residential amenity? Criteria may include overlooking and loss of privacy; safe and secure access; outlook/sense of enclosure; ensuring that access is and does not cause disturbances; sunlight, daylight, overshadowing and the need for artificial light; traffic movements and car parking; microclimate; other criteria?

Taller buildings

5.147 How can the Local Plan ensure that taller buildings are well designed and to make a positive contribution to the skyline; integrate visually with the townscape and the streetscape; include a mix of functions that are widely used by the public; and provide for safe, attractive and comfortable amenity/open spaces? What other criteria should be considered?

5.148 Should existing 'Areas of Taller Building Potential' within Sutton Town Centre and elsewhere be extended or kept as they are, having regard to the outcome of the updated Taller Building Study?

5.149 What is the potential for mid-rise residential buildings, such as mansion blocks or terraces, for achieving intensification while retaining a human scale?

Heritage

5.150 How can the Local Plan maintain and enhance the special historical and architectural character of the Borough's Conservation Areas and Areas of Special Local Character?

5.151 How can Local Plan policies and designations conserve the borough's historic places and heritage assets, including their settings, and to address heritage at risk as part of a positive strategy for the historic environment?

5.152 Should the Local Plan seek to strengthen its approach to protecting and enhancing the Borough's heritage assets?

(12) EQUALITIES AND QUALITY OF LIFE

Healthy lifestyles

5.153 How can Local Plan policies help to promote healthy and active lifestyles and transport choices for Borough residents of all ages?"

5.154 How can Local Plan policies enhance public access to open space, nature conservation sites and sports and recreation facilities such as playing pitches, children's play spaces and allotments, particularly within areas of deficiency?

5.155 How can the Local Plan help to promote healthy streets principles and active travel choices (including cycling and walking) in line with the Mayor's Transport Strategy and the aims of Sutton's Borough Sustainable Transport Strategy in order to improve air quality, reduce congestion, build greener, healthier communities and create more attractive places to live, work, play and do business?

Health inequalities and 'climate justice'

5.156 How can Local Plan policies contribute towards reducing health inequalities, tackling obesity, increasing access to healthy food and promoting 'climate justice' by minimise exposure and vulnerability to a range of climate impacts (heatwaves, air pollution, flooding etc)?

5.157 Should some developments require an assessment of the potential impacts of proposed developments on the mental and physical health and wellbeing of Sutton's communities?

5.158 How can Local Plan policies help to address crime reduction and community safety?

Housing accessibility

5.159 The need to provide homes of the right price, right tenure and right size for the borough's current and future residents. What mix of dwelling sizes and tenures should be required in new residential developments and what proportion

of dwellings should have three bedrooms or more?

5.160 What proportion of new dwellings within new residential developments should be accessible and adaptable (in line with Housing Technical Standard M4 (2)) and what proportion should be wheelchair user dwellings (in line with Housing Technical Standard M4 (3))?

5.161 The need for new residential developments to provide sufficient internal space, private amenity space and play space and informal recreation space to meet the needs of residents.

5.162 Should new dwellings be required to meet or improve upon the Mayor's minimum internal space standards set out in the London Plan 2021 Space Standards?

5.163 Should new new residential developments be required to meet or improve upon the Mayor's minimum private amenity space standards standards set out in the London Plan 2021 Space Standards?

5.164 How much play space and informal recreation space should be required in new major residential developments and should these meet or improve upon the London Plan Space Standards?

5.165 Should play space and informal recreation space standards be aligned with London Plan 2021 Space Standards?

Gypsy and travellers

5.166 Should the two existing gypsy and traveller sites at Carshalton Road, Woodmansterne (Pastures and Grove Place) continue to be safeguarded for gypsy and traveller accommodation?

5.167 Where should any new gypsy and traveller sites be located within the Borough if the need for additional accommodation is demonstrated in the Gypsy and Traveller Needs Assessment?

5.168 What locational criteria should be used to assess potential gypsy and traveller sites for inclusion in the Local Plan?

- parking and access to and from the road network? Impacts on the environment, local amenity, noise and air pollution? Proximity to local shops, transport, schools and health provision? Flood risk management? other?

6. SUSTAINABILITY APPRAISAL FRAMEWORK FOR SUTTON'S LOCAL PLAN

DEVELOPING AN APPRAISAL FRAMEWORK

6.1. As part of the sustainability appraisal (SA) process, the Council has developed an updated framework of sustainability objectives, indicators and targets, in order to assess the environmental, social and economic impacts of emerging Local Plan policy options and alternatives. The SA Framework set out in this chapter has been developed on the basis of the scoping process, the requirements of other relevant policies, plans, programmes described in Section 3 (Task A1), the environmental, social and economic baseline set out in Section 4 (Task A2) and the key sustainability issues and problems identified in Section 5 (Task A3). The finalised SA Framework for Sutton's Local Plan therefore reflects the ambitions of the Council in responding to the climate emergency and working towards a net zero carbon Borough

6.2. The detailed SA Framework set out in Table 6.1 consists of 12 core sustainability objectives arranged under the three themes of **(A) Environmental Sustainability (B) Sustainable Economic Growth (C) Equalities and Quality of Life**. In turn, each core sustainability objective is broken down into a number of sub-topics and associated indicators against which each Local Plan policy option and alternative will be assessed (see Section 9).

Table 6.1: Sustainability Appraisal Framework for Sutton's Local Plan

SA Objective	SA Sub-objective	Appraisal Questions	Indicators and Targets
(A) ENVIRONMENTAL SUSTAINABILITY			
(1) Climate Change Mitigation/ Net Zero Core SA Objective: To address the causes of climate change by minimising CO₂ emissions and promoting zero carbon standards in new development	1.1 Minimising carbon dioxide (CO₂) emissions and net zero To minimise CO ₂ emissions and promote 'net zero' carbon standards in new developments	<i>Will the policy or proposal minimise CO₂ emissions and promote 'net zero' carbon standards in new developments?</i>	<ul style="list-style-type: none"> percentage reduction in CO₂ emissions achieved by new-build residential and major non-residential developments compared to the Part L 2021 baseline; proportion achieving 'net zero carbon' standards taking account of unregulated emissions and whole life carbon (LWLC) – see below key metrics including Energy Use Intensity EUI (kWh/m²); space heating demand (kWh/m²), and renewable energy generation (kW)
	1.2 Energy Efficiency and Demand Reduction To achieve the highest standards of energy efficient design and layout in new developments	<i>Will the policy or proposal reduce energy demand and CO₂ emissions by promoting energy efficient design and layout in new developments?</i>	<ul style="list-style-type: none"> Percentage reduction in CO₂ emissions achieved through by energy efficient design and layout ('be lean') compared to the Part L 2021 baseline and Part L limiting values
	1.3 Efficient Energy Supply and Decentralised Energy (DE) To promote the efficient supply of low or zero carbon energy to new developments and district heat networks served by secondary heat sources	<i>Will the policy or proposal reduce CO₂ emissions by promoting low or zero carbon site-wide, communal or district heating networks served by secondary heat sources?</i>	<ul style="list-style-type: none"> percentage reduction in CO₂ emissions achieved by efficient supply of energy compared to the Part L 2021 baseline developments within Heat Network Priority Areas future proofed to enable connection to future district heating networks (Target: 100%) extent of low or zero carbon district heating networks within the borough percentage reduction in CO₂ emissions achieved through efficient supply ('be clean) compared to the Part L 2019 baseline the extent of low or zero carbon district heating networks in operation or planned and number of dwellings served (carbon savings)
	1.4 Renewable Energy To promote on-site renewable energy generation in new developments	<i>Will the policy or proposal reduce CO₂ emissions by promoting site-wide or district heating networks and/or renewable energy generated on-site?</i>	<ul style="list-style-type: none"> percentage reduction in CO₂ emissions achieved through efficient supply ('be clean) compared to the Part L 2019 baseline the extent of low or zero carbon district heating networks in operation or planned and number of dwellings served (carbon savings)
	1.5 Whole Life-Cycle (WLC) Carbon and Sustainable Design & Construction To minimise WLC carbon emissions; reduce embodied energy; source construction materials responsibly; and promote the highest standards of sustainable design and construction	<i>Will the policy or proposal minimise WLC carbon emissions; reduce embodied energy; source construction materials responsibly; and promote the highest standards of sustainable design and construction?</i>	<ul style="list-style-type: none"> number and proportion of developments meeting Mayoral benchmarks for WLC number and proportion of major non-residential developments achieving BREEAM Excellent

SA Objective	SA Sub-objective	Appraisal Questions	Indicators and Targets
(2) Flood Risk and Water Resources To avoid, reduce and manage all sources of flood risk to and from development taking account of climate change	2.1 Flood Risk Management and Making Space for Water To avoid or minimise all sources of flood risk to people and property by avoiding inappropriate development in flood risk areas having regard to the vulnerability of the proposed use and by 'making space for water'	<i>Will the policy or proposal help to avoid inappropriate development in flood risk areas in line with the sequential and exceptions tests, having regard to the vulnerability of the proposed use?</i>	<ul style="list-style-type: none"> Number of residential developments permitted within EA Flood Zones 2 Medium Risk; and 3a High Risk (Target: To minimise inappropriate development in flood risk areas in line with the sequential and exceptions tests) Number of residential developments permitted within EA Flood Zones 2 (medium risk) and 3a (High Risk) (Target: To minimise inappropriate development in flood risk areas in line with the 'sequential' and 'exceptions' tests)
	2.2 Flood Resilience To promote appropriate flood resilience/ resistance measures where necessary as part of the design and layout of new buildings and for basement developments located in flood risk areas	<i>Will the policy or proposal promote appropriate flood resilience/ resistance measures where necessary as part of the design and layout of new buildings and for basement developments located in flood risk areas?</i>	<ul style="list-style-type: none"> Number of residential developments permitted within EA Flood Zones 2 Medium Risk; and 3a High Risk (Target: To minimise inappropriate development in flood risk areas in line with the sequential and exceptions tests) Number of residential developments permitted within EA Flood Zones 2 (medium risk) and 3a (High Risk) (Target: To minimise inappropriate development in flood risk areas in line with the 'sequential' and 'exceptions' tests)
	2.3 Sustainable Urban Drainage (SuDS) To minimise surface water run-off by incorporating SuDS measures as part of the design and layout of new developments and by promoting SuDS retrofit measures	<i>Will the policy or proposal minimise surface water run-off from new developments by incorporating SuDS, managing run-off as close to its source as possible and aiming to achieve greenfield run-off rates?</i>	<ul style="list-style-type: none"> Number and proportion of residential and non-residential developments incorporating appropriate sustainable urban drainage (SuDS) measures (Target: 100%) Rate and volume of surface water run-off in the 1 in 100 year 6-hour storm event with climate change (Target: For brownfield sites, to minimise the rate of run-off to at least 50% of the pre-development rate and achieve greenfield rates where possible)
	2.4 River Wandle and Beverley Brook (Catchment Management) To maintain and restore natural floodplain; minimise water pollution; and improve the health of the River catchments and their value for biodiversity, urban cooling, drought resilience and local amenity	<i>Will the policy or proposal help to maintain and restore natural floodplain; minimise water pollution; and improve the health of the River Wandle and Beverley Brook catchments and their value for biodiversity, urban cooling, drought resilience and local amenity?</i>	<ul style="list-style-type: none"> River Wandle Catchment Plan objectives of the (Target: 100%) Environment Agency monitoring relating to chemical, biological and morphological indicators for the purposes of assessing the River Wandle and Beverley Brook against EU Water Framework Directive Targets. (To achieve objectives by 2021)
	2.5 Water Efficiency To minimise water use in new developments	<i>Will the policy improve water efficiency standards in new developments?</i>	<ul style="list-style-type: none"> Domestic water consumption (litres/p/day) in new dwellings (Target: 125 litres/person/day)

SA Objective	SA Sub-objective	Appraisal Questions	Indicators and Targets
(3) Open Space, Urban Greening And Biodiversity Net Gain (BNG) To enhance the provision and quality of Sutton's open environment, promote urban greening and biodiversity linkages and promote biodiversity net gain throughout the Borough	3.1 Strategic Open Land and Public Open Space To safeguard strategic open land and to maintain and enhance the provision, quality and access to public open space	<i>Will the policy or proposal safeguard the Green Belt and MOL and/or maintain or enhance provision of and accessibility to public open space?</i>	<ul style="list-style-type: none"> • area of Green Belt (ha) (Target: No loss) • area of MOL (ha) (Target: No loss) • area of unrestricted open space per 1,000 pop (ha/ 1,000 pop.). (Target: Maintain POS with unrestricted access at 2.88 ha/ 1,000 population)
	3.2 Urban Greening To promote urban greening and green space linkages through blue and green space measures as part of new developments, highway improvements and area renewal programmes, and by promoting the resoration of Beddington Farmlands	<i>Will the policy or proposal help to promote urban greening and green space linkages?</i>	<ul style="list-style-type: none"> • Green space factor (GSF) and Urban Greening Factor (UGF) scores for new developments and for wider areas within the Borough
	3.3 Biodiversity Net Gain & habitats To deliver biodiversity net gain (BNG) as part of new developments and over wider areas based on the Statutory Biodiversity Metric; create, or enhance key wildlife habitats and species and promote tree planting	<i>Will the policy or proposal help to deliver BNG as part of new developments and over wider areas; create or enhance key wildlife habitats and species within the Borough and promote tree planting?</i>	<ul style="list-style-type: none"> • biodiversity value for development sites and wider areas based on the Statutory Biodiversity Metric • number of habitats created or enhanced • mapping of key habitats across the borough (Greenspace Information for Greater London GiGL)
	3.4 Nature Conservation Sites, Areas of Deficiency and Green Corridors (Ecological Pathways) To protect and enhance (SINCs) and green corridors / ecological pathways within the Borough and to reduce areas of deficiency (AoD)	<i>Will the policy or proposal help to protect or enhance sites of importance for nature conservation (SINCs) and the integrity of green corridors / ecological pathways within the Borough and to reduce areas of deficiency (AoD)</i>	<ul style="list-style-type: none"> • Number and area (ha) of SINCs of metropolitan importance; Borough importance (Grade I & Grade II); and local importance (Target: To maintain number and area); • Number and area (ha) of local nature reserves (Target: To maintain or increase number and area of LNRs); • Area of built up land greater than 1km walking distance from a Metropolitan or Borough SINC (Target: To reduce area of built up land greater than 1km walking distance from a SINC); Para 5.10 page 53
	3.5 Backgarden Land To protect continuous blocks of backgarden land and its value for nature conservation	<i>Will the policy or proposal protect continuous blocks of backgarden land and their value for nature conservation, urban cooling and maintaining ecological pathways?</i>	<ul style="list-style-type: none"> • Extent of green corridor with the Borough (Target: To maintain extent and integrity of green corridor within the Borough)) • Number and percentage of dwellings completed (gross) on backgarden land (Target 90%) (i) GLA definition (only counting residential developments on garden land where no existing dwellings have been lost) (ii) LBS definition (including cases where existing dwellings on the site have been demolished and new dwellings built in their place)

SA Objective	SA Sub-objective	Appraisal Questions	Indicators and Targets
(4) Sustainable Transport, Healthy Streets and Air Quality To reduce traffic levels, congestion, reduce local air pollution, promote active and sustainable modes of transport and promote healthy streets	4.1 Traffic Reduction (trips) To minimise the impacts of road traffic and congestion on air quality, greenhouse emissions, public health local amenity and quality of life by reducing the need to travel	<i>Will the policy or proposal minimise the impacts of road traffic and congestion on air quality, greenhouse emissions, public health local amenity and quality of life by reducing the need to travel?</i>	<ul style="list-style-type: none"> monitored traffic levels in million vehicle kilometres per annum (Target from Sutton Transport Plan 2011-31: Reduce traffic levels)
	4.2 Sustainable and Active Modes To reduce dependence on the car and promote sustainable and active modes of transport such as walking, cycling and public transport	<i>Will the policy or proposal reduce dependence on the private car and promote sustainable and active modes of transport such as walking, cycling and public transport,</i>	<ul style="list-style-type: none"> proportion of the urban area of the Borough within easy walking distance (400m) of frequent bus services (at least 2 buses per hour) (Target: Increase proportion) percentage of trips originating in LB Sutton where the main mode is by public transport percentage of trips originating in LB Sutton where the main mode is by cycling or walking
	4.3 Healthy Streets To promote the Mayor's 10 'healthy streets' principles: people choose to walk; cycle and use public transport; pedestrians from all walks of life; easy to cross; people feel safe; things to see and do; places to stop and rest; people feel relaxed; not too noisy; clean air ; shade & shelter	<i>Will the policy or proposal help to promote the Mayor's 'healthy streets' principles within the Borough in line with the Mayor's Transport Plan and the Borough Sustainable Transport Strategy (STS) 2020-25</i>	
	4.4 Safety, security & mobility To improve the safety and security of road users, particularly for pedestrians, cyclists and public transport users and to promote access and mobility for all	<i>Will the policy or proposal improve the safety and security of road users and to promote transport accessibility and mobility for all, especially disabled & older residents</i>	<ul style="list-style-type: none"> number of people killed or seriously injured (KSI) on the Borough's road network per annum number of children killed or seriously injured (KSI) on the Borough's road network per annum
	4.5 Air, Soil and Water Quality To minimise local air pollution within the Borough and associated health impacts, particularly within Air Quality Focus Areas (AQFAs)	<i>Will the policy or proposal help to maintain or reduce local air pollution from new developments and associated transport movements</i>	<ul style="list-style-type: none"> NO₂ levels in µg/m³ (Target: 200 µg/m³ as a 1-hr mean no more than 18 days per year) PM10¹ levels in µg/m³ (Target: 50 µg/m³ as a 24-hr mean no more than 35 days/year; not to exceed 40 µg/m³ as ann. mean) ozone levels in µg/m³ as an 8-hour mean (Target: No more than 100 µg/m³ as an 8 hour mean more than 10 times a year) developments meeting the Mayor's 'air quality neutral' and 'air quality negative' standards developments served by gas boilers or gas CHP units within AQFAs and the Borough;

¹ PM10s = particulate matter less than 10 microns in size

SA Objective	SA Sub-objective	Appraisal Questions	Indicators and Targets
(B) SUSTAINABLE ECONOMIC GROWTH			
(5) Town Centres To enhance the vitality and viability and regeneration of Sutton Town Centre and town centres throughout the Borough and to promote access to community shopping facilities	5.1 Sutton Town Centre – retail To encourage the vitality and viability of Sutton Town Centre	<i>Will the policy or proposal help to promote the vitality and viability of Sutton Town Centre and enhance its status as a Metropolitan centre in South London?</i>	<ul style="list-style-type: none"> • Sutton Town Centre ‘health check’ data and footfall • vacant commercial properties and diversity of uses. • net gain in retail floorspace in Sutton Town Centre falling within in Class E(a) of the Use Class Order 2020 (formerly Class A1) • net gain in office floorspace in Sutton Town Centre falling within in Class E(g) of the Use Class Order 2020 (formerly Class A1)
	5.2 Area renewal - town centres	<i>Will the policy or proposal help to:</i> <ul style="list-style-type: none"> • promote the redevelopment of key development sites for beneficial uses, including for new homes and jobs; • promote the night time economy; • secure investment in strategic transport infrastructure • deliver affordable housing; • deliver improvements to the public realm and urban greening; • achieve biodiversity net gain (BNG) • heritage value and cultural activities; • promote a transition to net zero 	<ul style="list-style-type: none"> • redevelopment of strategic development sites for beneficial uses; • net gain in retail and office floorspace (m²); • implementation of strategic transport infrastructure • net additional dwellings and affordable housing delivery; • housing estates regenerated; • public realm, highway and urban greening improvements delivered • increase green space factor (GSF) score for key development sites & town centre as a whole; • increase in biodiversity value for key development sites and for the town centre as a whole (BNG uplift); • develop cultural activities; • number of town centre developments achieving net zero standards; number of developments connected to low or zero carbon heat networks served by by secondary heat sources; and renewable energy generation
	5.3 District centres To promote the vitality and viability of the Borough’s district and local centres	<i>Will the policy or proposal promote the vitality and viability of district and local centres, particularly within areas of planned housing growth and regeneration such as Hackbridge and Wallington district centres?</i>	<ul style="list-style-type: none"> • district centre ‘health check’ indicators for Wallington, Hackbridge, Carshalton, Cheam, North Cheam, Rosehill and Worcester Park • vacant commercial properties and diversity of uses in each district centre. • net gain in retail floorspace in Sutton Town Centre falling within in Class E(a) of the Use Class Order 2020 (formerly Class A1) • redevelopment of strategic development sites for beneficial uses.
	5.4 Local centres and local community shopping facilities To promote the vitality and viability of the Borough’s local centres and to maintain community shops	<i>Will the policy or proposal help to safeguard the important role of local centres and isolated shopping parades / community shopping for residential areas?</i>	<ul style="list-style-type: none"> • avoiding loss of community shopping facilities (Class F2) • avoiding loss of retail floorspace within the Borough’s local centres; • proportion of the residential area of the borough within 1,000 m of a local shop

SA Objective	SA Sub-objective	Appraisal Questions	Indicators and Targets
(6) Sustainable Economic Growth, Local Employment, Education and Skills To promote a strong, sustainable and high-skilled local economy	6.1 Sustainable Economic Growth To promote a strong, vibrant and sustainable local economy that enhances business competitiveness	<i>Will the policy or proposal promote the competitiveness of the local economy by attracting business investment, removing barriers to enterprise, supporting start ups and promoting social enterprises?</i>	<ul style="list-style-type: none"> • business investment (£) (Target: Increase) • active business enterprises and growth rate (Target: Increase) • proportion of new enterprises surviving 1 year (Target: Increase) • Proportion of the Borough's population aged 16-64 who are economically active ; • Investment in Sutton Link and other strategic transport infrastructure
	6.2 Employment Land To meet the identified need for employment land and premises within Strategic Industrial Locations (SILs) and locally significant industrial sites (LSIS) for the Borough having regard to strategic requirements set out in the London Plan 2021 and to increase access to local employment opportunities	<i>Will the policy or proposal help to safeguard existing and/or provide additional employment floorspace within the Borough's Strategic Industrial Locations (SILs) and locally significant industrial sites (LSIS) in order to meet identified needs?</i> <i>Will the policy or proposal promote the intensification of industrial uses?</i> <i>Will the policy or proposal help to increase access to local employment opportunities and reduce economic inactivity amongst Borough residents?</i>	<ul style="list-style-type: none"> • safeguarded employment land (ha) and floorspace (m²) within each SIL and LSIS and Borough total; • vacant employment land (ha) and floorspace (m²); • development of employment land for industrial uses within Classes B2 and B8 of the Use Class Order 2020 or for waste management uses (<i>sui generis</i>) • retention of established industrial areas for employment uses • employee jobs and self-employment jobs in LB Sutton • unemployment - Job Seekers' Allowance Claimants aged 16-64 • youth unemployment – JSA Claimants aged 18-24 • income Domain of the CLG's Indices of Deprivation 2019
	6.3 Offices To meet the identified need for office floorspace within the Borough's town centres and elsewhere and to prevent the loss of office uses to residential uses where possible	<i>Will the policy or proposal help to meet the need for office floorspace within the Borough's town centres and elsewhere and help to prevent the loss of office uses to residential?</i>	<ul style="list-style-type: none"> • net gain in office floorspace falling within in Class E(g) of the Use Class Order 2020 (formerly Class A1) Sutton Town Centre, district centres and elsewhere within the Borough (m²) • loss of office floorspace to residential uses via permitted developments
	6.4 Environmental and Business Improvements To promote Council-led, business and community initiatives to deliver environmental and business improvements to industrial areas	<i>Will the policy or proposal support the delivery of Council-led, business and community initiatives to deliver environmental and business improvements to industrial areas in line with local community aspirations?</i>	<ul style="list-style-type: none"> • implementation of environmental, business and highway improvements within areas adversely affected by industrial and waste management activities including the the Beddington North Neighbourhood and Beddington Lane improvements • Number of complaints received by the EA regarding dust, odour and noise from regulated waste management sites • Business Improvement Districts (BIDs) established

SA Objective	SA Sub-objective	Appraisal Questions	Indicators and Targets
<p>(7) Urban Regeneration and Area Renewal</p> <p>To promote urban regeneration and area renewal throughout the borough</p>	<p>7.1 London Cancer Hub</p> <p>To support the delivery of the London Cancer Hub (LCH) project in line with the aims of the adopted LCH Masterplan by working with the Harris Academy, Royal Marsden, the Institute of Cancer Research (ICR) and the Epsom & St Helier University Hospitals NHS Trust, the local community and other stakeholders:</p>	<p>Will the policy or proposal help to deliver:</p> <ul style="list-style-type: none"> • the LCH project as a whole • a state-of-the-art life science campus specialising in cancer research, treatment, and enterprise • a new Specialist Emergency Care Hospital (SECH); • new employment floorspace, • strategic transport infrastructure • healthy streets objectives • net zero ,and biodiversity net gain (BNG) and other climate emergency objectives 	<ul style="list-style-type: none"> • implementation of the targets and timescales set out in the approved LCH 'London Cancer Hub project
	<p>7.2 Tramlink/ Sutton Link</p> <p>To support the delivery of Sutton Link and to enable the future delivery of the proposed Tramlink extension</p>	<p>Will the policy or proposal support:</p> <ul style="list-style-type: none"> • the delivery of Sutton Link • the future proposed extension of Tramlink to serve Sutton Town Centre and Belmont (LCH site) 	<ul style="list-style-type: none"> • implementation of Sutton Link; • land safeguarded for the future extension of Tramlink to serve Sutton Town Centre and Belmont (LCH site)
	<p>7.3 Area Renewal</p> <p>To support area renewal schemes and associated environmental, public realm and highway enhancements throughout the Borough such as Sutton Town Centre, Beddington Lane and Rosehill</p>	<p>Will the policy or proposal support:</p> <ul style="list-style-type: none"> • area renewal schemes • public realm and highway improvements • environmental improvements 	<ul style="list-style-type: none"> • implementation of area renewal schemes; • implementation of public realm and highway improvements • implementation of environmental improvements including SuDS retrofit, BNG and urban greening measures such as pocket parks

SA Objective	SA Sub-objective	Appraisal Questions	Indicators and Targets
<p>(8) The Green Economy; Decentralised Energy; Decarbonisation and Retrofit</p> <p>To attract green business and jobs to the Borough; promote the 'circular' economy; promote decentralised energy networks served by low or zero carbon sources of energy and accelerate the decarbonisation of existing social housing stock and other buildings.</p>	<p>8.1 Green Economy (including the Circular Economy) To promote the growth of Sutton's green economy/ circular economy</p>	<p><i>Will the policy/ proposal support growth of new and existing low carbon businesses and assist in greening the local economy?</i></p>	<ul style="list-style-type: none"> • number of people employed in the Green Economy compared to 2011 (Target: a 25% increase in people employed in the Green Economy compared to 2011); and • number of Green Businesses (Target: a 25% increase on 2011); • development of industrial land and commercial floorspace for green business; • complimentary waste management or industrial developments which implement circular economy principles
	<p>8.2 Decentralised Energy To work with heat network operators, developers and the local community to deliver or extend low or zero carbon district heat networks to serve existing and new developments within identified heat network priority areas within the Borough</p>	<p><i>Will the policy or proposal promote the delivery of low or zero carbon district heat networks to serve existing and new developments within identified heat network priority areas such as Hackbridge/ Rosehill; Sutton Town Centre and the London Cancer Hub (LCH)?</i></p>	<ul style="list-style-type: none"> • number of new and existing buildings and number of residential units served by low or zero carbon district heat networks; • number of new and existing buildings and number of residential units which are future proofed to enable connection to low or zero carbon district heat networks; • low or zero carbon heat generated and distributed to new and existing buildings via low or zero carbon district heat networks • length of district heat network pipework and safeguarding of routes; • number of completed and permitted developments and number of residential units served by communal or site-wide heat networks served by low or zero carbon sources of energy
	<p>8.3 Decarbonisation, Energy Retrofit, and Carbon Offsetting To promote the decarbonisation of publicly owned buildings and Council housing; energy efficiency and other retrofit measures and carbon offsetting in line with Sutton's Climate Emergency Plan</p>	<p><i>Will the policy or proposal promote the decarbonisation of publicly owned buildings and Council housing; energy efficiency and other retrofit measures and carbon offsetting</i></p>	<ul style="list-style-type: none"> • number of publicly owned buildings and Council housing estates/ dwellings incorporating decarbonisation measures (including energy retrofit and renewable energy measures); • renewable energy generating capacity installed on existing and new buildings and carbon savings; • carbon offset measures implemented (number of measures and carbon savings) and carbon offsetting monies spent (£)

SA Objective	SA Sub-objective	Appraisal Questions	Indicators and Targets
(C) SUSTAINABLE COMMUNITIES AND EQUALITIES			
(9) Access to Housing To meet the future local need for housing and the Borough's share of London's need	9.1 Housing Provision To provide for sufficient net additional dwellings in order to meet and exceed Borough housing targets over the period of the Local Plan (10-15 years) and to support economic growth	<i>Will the policy or proposal provide for sufficient net additional dwellings to meet and exceed Borough housing targets over the period of the Local Plan (10-15 years)</i>	<ul style="list-style-type: none"> net additional dwellings completed within the Borough per year net additional dwellings completed in Sutton Town Centre, Hackbridge, other district centres (including APIs) and elsewhere in the Borough 5 Year housing land supply assessment (SHLAA) –from (a) sites projected to be completed (b) under construction (c) with permission (d) allocated (e) unallocated; and (f) office to residential' net additional dwellings completed by type and by size Strategic Housing Market and Local Housing Need Assessment (SHLA) <ul style="list-style-type: none"> household growth (p.a.) 2024-34 (1,234) London Plan 2021 target (469 net additional dwellings pa) uncapped housing need (1,942 p.a.) capped housing need (657 p.a.) Borough housing need accounting for urban uplift: 886 p.a housing density in Areas of Potential Intensification (APIs) areas and elsewhere (per ha)
	9.2 Affordable Housing To maximise the provision of affordable housing within the Borough in order to meet identified needs.	<i>Will the policy or proposal maximise the provision of affordable housing and ensure that an appropriate mix of sizes of affordable units is provided in a range of locations to best meet identified needs?</i>	<ul style="list-style-type: none"> number of affordable dwellings completed per year (gross) affordable dwellings completed as a percentage of total net additional developments
	9.3 Gypsy and Traveller Accommodation To safeguard sufficient land to meet the future need for gypsy and traveller pitches within the Borough	<i>Will the policy or proposal ensure sufficient care home and nursing home provision and supported accommodation is provided to meet identified needs?</i>	<ul style="list-style-type: none"> amount of land and additional number of pitches safeguarded provided for gypsies and travellers
	9.4 Care Home Accommodation To provide sufficient care home and nursing home provision and supported accommodation to meet identified needs.	<i>Will the policy or proposal ensure sufficient care home and nursing home provision and supported accommodation is provided to meet identified needs?</i>	<ul style="list-style-type: none"> Care home and nursing home capacity Supported accommodation

SA Objective	SA Sub-objective	Appraisal Questions	Indicators and Targets
(10) Social and Community Infrastructure To maintain and enhance good access to health, education, sports, leisure and other public amenities for Borough residents	10.1 Education, Skills and Training To provide for new schools and expanded school capacity as necessary to accommodate the need for additional primary and secondary school places throughout the Borough and to promote further education, skills and training to ensure that residents have skills required to meet needs of businesses and future growth sectors	Will the policy or proposal support the provision of new schools and expanded school capacity as necessary to accommodate the need for additional primary and secondary school places? Will the policy or proposal promote education, skills and training and reduce the proportion of residents who are 'not in education, employment or training' (NEETs)?	<u>Schools</u> <ul style="list-style-type: none"> number of primary and secondary schools and school places; number of pupils attending primary and secondary schools within the Borough (school rolls) number of pupils in excess of total secondary/primary school capacity and schools over capacity new schools/ school capacity built each year future demand for primary and secondary school places <u>Further education, skills and training)</u> <ul style="list-style-type: none"> scores and ranking of super output areas (SOAs) against 'educational skills and training' domain of Indices of Deprivation; proportion of 16-18 year olds who are Not in Education, Employment or Training (NEETs) (Target: Reduce)
	10.2 Health Provision To provide for additional healthcare facilities as appropriate to meet the identified needs in different parts of the Borough	Will the policy or proposal support the provision of additional healthcare facilities and hospital capacity as appropriate to meet the identified needs in different parts of the Borough?	<ul style="list-style-type: none"> provision of primary care/GP surgeries, health centres and hospitals within the Borough
	10.3 Sports and Leisure Provision To provide for sports and leisure and playspace facilities as necessary to serve the needs of different parts of the Borough	Will the policy or proposal support the provision of additional sports and leisure facilities and playspace facilities as necessary to address identified deficiencies across the Borough?	<ul style="list-style-type: none"> provision of and access to sports and leisure facilities within the Borough
	10.4 Playspace Provision To maintain or provide additional playspace facilities as necessary to address identified deficiencies across the Borough	Will the policy or proposal support the provision of additional sports and leisure facilities and playspace as necessary to address deficiencies across the Borough? Will the policy or proposal maintain and enhance accessibility to playspace?	<ul style="list-style-type: none"> provision of playspaces (local equipped areas of play LEAPs and neighbourhood equipped areas of play NEAPs) areas deficient in access (ha) defined as 400m or more from a local equipped area of play (LEAP) or 400m or more from a NEAP (Target: Reduce)
	10.5 Cultural Facilities To maintain and/or enhance the provision of cultural facilities across the Borough additional playspace facilities as necessary to address identified deficiencies across the Borough	Will the policy or proposal help to maintain and/or enhance the provision of cultural facilities across the Borough including theatres, libraries, live music venues, museums and public houses?	<ul style="list-style-type: none"> provision of cultural facilities across the Borough including theatres, libraries, live music venues, museums and public houses

SA Objective	SA Sub-objective	Appraisal Questions	Indicators and Targets
(11) Built and Historic Environment To protect and enhance the quality of built design, townscape quality, local character and the Borough's historic environment	14.1 Built Design, Local Character and Townscape Quality To protect and enhance the quality of the Borough's residential environment by promoting good design; ensuring that proposed developments respect the positive features of Sutton's suburban character, and by reinforcing local distinctiveness	<i>Will the policy or proposal protect and enhance the quality of the Borough's built environment and townscape by promoting good design, ensuring that proposed developments respect the positive features of Sutton's suburban character, and reinforces local distinctiveness?</i> <i>Will the policy or proposal enhance the quality of open landscape and views?</i>	<ul style="list-style-type: none"> assessments of 'local distinctiveness' and 'identity' (survey) updated Urban Characterisation Study 2023: areas falling in 'local settings' categories: <ul style="list-style-type: none"> - central: very dense development; mix of uses; high buildings - urban: predominantly dense e.g. terraced houses; mix of uses.; - north suburban: residential neighbourhoods, predominantly semi-detached and terraced properties; - south suburban: predominantly detached and semi detached, implementation of environmental improvement schemes
	14.2 Historic Environment To preserve and enhance the Borough's historic environment, including Conservation Areas, Areas of Special Local Character (ASLCs), listed buildings and other historic assets.	<i>Will the policy or proposal ensure that development is of a high standard of design which preserves and enhances the Borough's historic environment, including Conservation Areas, listed buildings and other historic assets?</i>	<ul style="list-style-type: none"> number and area of Conservation Areas, Areas of Special Local Character (ASLCs), Grade I & II Listed & locally listed buildings number of heritage assets 'at risk' in the borough and positive enhancement measures undertaken no of character appraisals of Conservation Areas carried out number of Conservation Areas with adopted management plan
	2.4 Climate Change Adaptation To ensure that all new developments are fully adapted and resilient to future climate impacts <ul style="list-style-type: none"> See also (12) 	<i>Will the policy or proposal ensure that new developments maximise the benefits of blue and green space for flood management, urban cooling, resilience to drought, biodiversity and other adaptation objectives.</i>	<ul style="list-style-type: none"> Number and proportion of developments incorporating green and blue space climate change adaptation measures in line with the Mayor's Climate Change Adaptation Strategy and the Council's Green Space Guidelines (Target: 100%) Number and proportion of developments supporting the objectives of the Mayor's 'Green Grid' where appropriate

SA Objective	SA Sub-objective	Appraisal Questions	Indicators and Targets
<p>(12) Equalities, Socio-Economic Deprivation, , Healthy Lifestyles and Climate Justice</p> <p>To ensure that the Local Plan does not discriminate against equalities target groups; promotes climate justice, addresses socio-economic deprivation; promotes healthy and balanced communities, and promotes community safety</p>	<p>12.1 Equalities</p> <p>To promote equal opportunities and address inequalities affecting one of more of the following groups: Women; Black & minority (BAME); Older people; Young people and children; Disabled people; Lesbians; gays; bi & trans; different faith groups; and gypsies and travellers</p>	<p><i>Will the policy or proposal have a positive or negative impact on one or more of the equality target groups or, improve equal opportunities and/or relationships between groups.</i></p>	<ul style="list-style-type: none"> • Assessment of positive or negative impacts on one or more of the following equalities target groups: <ul style="list-style-type: none"> - Women - Black and minority ethnic (BME) - - Older people - Young people and children - Disabled people - Lesbians, gays, bisexuals and transgendered - different faith groups - gypsies and travellers
	<p>12.2 Climate Justice</p> <p>To deliver an equitable* 2planning policy responses to climate change within the Borough including summer heatwaves, drought and the increased severity and frequency of flooding by assisting the socially just responses to the impacts of extreme events as well as supporting wider climate change adaptation aims.</p>	<p><i>Will the policy or proposal help to minimise the impacts of future climate change, including summer heatwaves, the urban heat island (UHI) effect drought and the increased severity and frequency of flooding events on vulnerable groups</i></p>	<ul style="list-style-type: none"> • climate adaptation and climate resilience measures implemented as part of new developments and within the public realm • using mapping available from the Climate Just website and other sources such as the GLA to identify parts of the Borough and resident populations which are more vulnerable to climate impacts • Assessment of positive or negative impacts on one or more of the identified equalities target groups:
	<p>12.3 Socio-Economic Deprivation and Fuel Poverty</p> <p>To reduce socio-economic deprivation and fuel poverty within the Borough</p>	<p><i>Will the policy or proposal help to reduce socio-economic deprivation and fuel poverty within relatively deprived areas of the Borough?</i></p> <p><i>Will the policy or proposal help to reduce fuel poverty?</i></p>	<ul style="list-style-type: none"> • scores of lower level super output areas (LSOAs) based on Indices of Deprivation (ID2019) • number and proportion of SOAs with deprivation scores ranked within each quintile nationally scores and rankings of SOAs for of 'income', employment' & 'education, skills and training'; • JSA Claimants as a proportion of working age pop (16-74); • proportion of 16-18 year olds who are NEETs (Target: Reduce) • proportion of fuel poor households³ within the Borough
	<p>12.4 Balanced Communities</p> <p>To promote mixed and balanced communities throughout the Borough</p>	<p><i>Will the policy or proposal contribute to the creation of mixed and balanced communities?</i></p>	<ul style="list-style-type: none"> • range and mix of tenure and household types and sizes • relative proportions and mix of social, intermediate and market housing affordable in an area • relative proportions of 1 bed, 2-bed, 3-bed and family dwellings
	<p>12.5 Community Safety</p> <p>To reduce crime, fear of crime & anti-social behaviour</p>	<p><i>Will the policy or proposal reduce actual crime, fear of crime or anti-social behaviour?</i></p>	<ul style="list-style-type: none"> • scores and rankings of super output areas (SOAs) in relation to the Government's Deprivation domains of 'crime'; • crimes per 1,000 pop (overall, violent offences, burglary etc)

² an 'equitable response' in this context means avoiding having a disproportionate impact upon vulnerable groups, including the elderly, the young, people with long-term health conditions and people living in poor quality housing

³ a fuel poor household is one where the household income is below the poverty line, once energy costs are taken into account and the energy costs are higher than is typical for their household type

7. TESTING PLAN OBJECTIVES AGAINST SA FRAMEWORK (TASK B1)

COMPATABILITY ANALYSIS

7.1 Government guidance emphasises the importance of compatibility analysis as part of the appraisal process as a way of ensuring that emerging Plan objectives are fully compatible and actively contribute towards each of the sustainability objectives in the SA Framework. Compatibility analysis is also used to highlight those specific areas of planning policy that might potentially be in conflict with overarching sustainability objectives in the absence of appropriate mitigation (e.g. accommodating additional housing while affording protection for employment land or open space).

SUTTON'S PROPOSED LOCAL PLAN VISION

7.2 The Local Plan Issues and Preferred Options document sets out the following proposed Vision for what the Borough will look like by the end of the plan period in 2041.

PROPOSED VISION

In 2041, Sutton will be a sustainable, net zero carbon borough, with well-designed, well-connected, attractive neighbourhoods where everyone feels welcome. Sutton will be known as a place with high-quality local services, sustainable travel, a place that is taking responsibility for tackling climate change, supports its most vulnerable residents and helps its communities live in affordable, good quality homes. This will be supported by a strong, fair and resilient economy.

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

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

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

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

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

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

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

SUTTON'S PROPOSED LOCAL PLAN OBJECTIVES

7.3 The draft Local Plan Vision is supported by the following proposed strategic objectives which the Council's emerging Local Plan policies and proposals are seeking to address.

PROPOSED LOCAL PLAN OBJECTIVES

Sutton's Communities and Homes

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

Sutton's Climate Emergency

7. To address the causes of climate change and deliver a 'net zero' carbon borough in line with the Sutton's Environment Strategy and Climate Emergency Response Plan by avoiding or minimising both operational and whole-life carbon emissions from all new developments, promoting renewable energy generation and ensuring that any residual on-site emissions are offset through equivalent off-site measures.
8. To be fully adapted to the adverse impacts of climate change on human health, quality of life and the natural environment.
9. To support decentralised energy networks expansion across Sutton
10. To develop and deliver flood alleviation schemes and enhance the quality of the River Wandle and its environs to increase the climate response benefits

11. To protect and enhance the boroughs natural environment, wildlife and habitats, through the implementation of biodiversity net gain, protection of our open spaces and continued tree planting.
12. Reduce and mitigate environmental impacts including from pollution (such as air, noise, light, odour, fumes, water and soil) and secure improvements in air quality.

Sutton's Economy and Employment

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

Sutton's High Streets and Centres

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

Sutton's Movement

21. To improve sustainable transport within the borough from all sources to encourage residents to make more sustainable travel choices.
22. To enhance footpaths and cycling routes to encourage walking and cycling.
23. To implement the Belmont Rail Frequency Improvement Scheme and continue to lobby the government, the Mayor and TfL for further transport infrastructure funding
24. To support the move towards low carbon transport. This includes supporting electric vehicles by increasing charging infrastructure across the borough.

7.4 The Compatability Matrix in Table 7.1 presents the outcome of testing each of the 24 proposed Local Plan Objectives above against the 12 key Sustainability Appraisal objectives making up the Council's SA Framework.

7.5 The following symbols have been used to test the compatibility of each proposed Strategic Objective with achieving the sustainability objectives within the SA Framework


- compatible and synergistic objectives (√ √)
- compatible (√)
- incompatible (X)
- potentially in conflict in the absence of appropriate mitigation (?)
- no interaction 

Table 7.1: Compatibility Matrix to Test Proposed Local Plan Objectives

KEY ✓✓ Compatible & Synergistic ✓ Compatible objectives ✗ Incompatible ? Potential Conflict // No interaction PROPOSED PLAN OBJECTIVES	SA FRAMEWORK OBJECTIVES											
	(A) Environmental Sustainability				(B) Sustainable Economic Growth				(C) Sustainable Communities and Equalities			
	(1) Climate Change Mitigation/ Net Zero	(2) Flood Risk and Water Resources	(3) Open Space, Urban Greening and BNG	(4) Sustainable Transport, Healthy Streets & Air Quality	(5) Town Centres	(6) Sustainable Economic Growth,	(7) Urban Regeneration and Urban Renewal	(8) Green Economy; Decarbonisation and Retrofit	(9) Access to Housing	(10) Social and Community Infrastructure	(11) Built and Historic Environment	(12) Equalities, Deprivation, Health and Climate Justice
	To address the causes of climate change by minimising CO ₂ emissions and promoting zero carbon standards in new development	To avoid, reduce and manage all sources of flood risk to and from development taking account of climate change	To enhance Sutton's open environment, promote urban greening and biodiversity linkages and promote biodiversity net gain	To reduce traffic, congestion, reduce air pollution, promote active & sustainable modes of transport and promote healthy streets	To enhance the vitality and viability and regeneration of Sutton Town Centre and town centres and to promote access to community shopping	To promote a strong, sustainable and high-skilled local economy	To secure inward investment for urban regeneration; area renewal schemes and highway, transport and public realm improvements	To attract green business and jobs; promote the 'circular' economy; promote decentralised energy and accelerate the decarbonisation	To meet the future local need for housing and the Borough's share of London's need	To maintain and enhance good access to health, education, sports, leisure and other public amenities for Borough residents	To protect and enhance the quality of built design, townscape quality, local character and the Borough's historic environment	Avoid discrimination against equalities groups; promotes climate justice, (cuts) deprivation; promotes healthy balanced communities
Sutton's Communities and Homes												
(1) To meet Sutton's share of London's future housing requirement across a range of tenures and sizes to address the needs of the borough's communities.	✓?	✓?	✓?	✓?	✓✓	✓✓	✓✓	✓?	✓✓	✓?	✓?	✓✓
(2) To provide more affordable homes, including council housing and estate regeneration and affordable private rented homes, across the borough.	✓?				✓✓		✓✓	✓?	✓✓			✓✓
(3) To meet the needs of Sutton's older people and other groups who need specialist housing.									✓✓			✓✓
(4) To ensure growth is respectful of Sutton's suburban character and historic environment and protects and enhances the borough's local distinctiveness.			✓✓		✓	✓	✓		✓?		✓✓	✓✓
(5) To use the Green Belt, Metropolitan Open Land, the parks and other open spaces to protect the open feel of the borough.		✓	✓✓						✓?		✓	✓✓
(6) To provide the necessary education and health facilities and to ensure utilities and digital infrastructure can continue to support growth.					✓✓	✓✓	✓✓		✓	✓✓		✓✓

SA FRAMEWORK OBJECTIVES												
	(A) Environmental Sustainability				(B) Sustainable Economic Growth				(C) Sustainable Communities and Equalities			
KEY	(1) Climate Change Mitigation/ Net Zero	(2) Flood Risk and Water Resources	(3) Open Space, Urban Greening and BNG	4) Sustainable Transport, Healthy Streets & Air Qualit	(5) Town Centres	(6) Sustainable Economic Growth,	(7) Urban Regeneration and Urban Renewal	(8) Green Economy; Decarbonisation and Retrofit	(9) Access to Housing	(10) Social and Community Infrastructure	(11) Built and Historic Environment	(12) Equalities, Deprivation, Health and Climate Justice
✓✓ Compatible & Synergistic ✓ Compatible objectives ✗ Incompatible ? Potential Conflict ▨ No interaction	To address the causes of climate change by minimising CO ₂ emissions and promoting zero carbon standards in new development	To avoid, reduce and manage all sources of flood risk to and from development taking account of climate change	To enhance Sutton's open environment, promote urban greening and biodiversity linkages and promote biodiversity net gain	To reduce traffic, congestion, reduce air pollution, promote active & sustainable modes of transport and promote healthy streets	To enhance the vitality and viability and regeneration of Sutton Town Centre and town centres and to promote access to community shopping	To promote a strong, sustainable and high-skilled local economy	To secure inward investment for urban regeneration; area renewal schemes and highway, transport and public realm improvements	To attract green business and jobs; promote the 'circular' economy; promote decentralised energy and accelerate the decarbonisation	To meet the future local need for housing and the Borough's share of London's need	To maintain and enhance good access to health, education, sports, leisure and other public amenities for Borough residents	To protect and enhance the quality of built design, townscape quality, local character and the Borough's historic environment	Avoid discrimination against equalities groups; promotes climate justice, (cuts) deprivation; promotes healthy balanced communities
Sutton's Climate Emergency												
(7) To address the causes of climate change and deliver a 'net zero' carbon borough in line with the aims of Sutton's Environment Strategy and Climate Emergency Response Plan by avoiding or minimising both operational and whole-life carbon emissions from all new developments, promoting renewable energy generation and ensuring that any residual on-site emissions are offset through equivalent off-site measures.	✓✓	✓	✓			✓		✓✓	✓?			✓✓
(8) To be fully adapted to the adverse impacts of climate change on human health, quality of life and the natural environment.	✓	✓✓	✓✓			✓		✓	✓			✓✓
(9) To support decentralised energy networks expansion across Sutton	✓✓	✓			✓✓	✓	✓✓	✓✓	✓	✓✓		✓✓
(10) To develop and deliver flood alleviation schemes and enhance the quality of the River Wandle and its environs to increase the climate response benefits	✓	✓✓	✓✓					✓	✓			✓✓
(11) To protect and enhance the boroughs natural environment, wildlife and habitats, through the implementation of biodiversity net gain, protection of our open spaces and continued tree planting.	✓	✓✓	✓✓					✓	✓?	✓		✓✓

SA FRAMEWORK OBJECTIVES												
	(A) Environmental Sustainability				(B) Sustainable Economic Growth				(C) Sustainable Communities and Equalities			
KEY	(1) Climate Change Mitigation/ Net Zero	(2) Flood Risk and Water Resources	(3) Open Space, Urban Greening and BNG	4) Sustainable Transport, Healthy Streets & Air Qualit	(5) Town Centres	(6) Sustainable Economic Growth,	(7) Urban Regeneration and Urban Renewal	(8) Green Economy; Decarbonisation and Retrofit	(9) Access to Housing	(10) Social and Community Infrastructure	(11) Built and Historic Environment	(12) Equalities, Deprivation, Health and Climate Justice
✓✓ Compatible & Synergistic ✓ Compatible objectives ✗ Incompatible ? Potential Conflict ▨ No interaction	To address the causes of climate change by minimising CO ₂ emissions and promoting zero carbon standards in new development	To avoid, reduce and manage all sources of flood risk to and from development taking account of climate change	To enhance Sutton's open environment, promote urban greening and biodiversity linkages and promote biodiversity net gain	To reduce traffic, congestion, reduce air pollution, promote active& sustainable modes of transport and promote healthy streets	To enhance the vitality and viability and regeneration of Sutton Town Centre and town centres and to promote access to community shopping	To promote a strong, sustainable and high-skilled local economy	To secure inward investment for urban regeneration; area renewal schemes and highway, transport and public realm improvements	To attract green business and jobs; promote the 'circular' economy; promote decentralised energy and accelerate the decarbonisation	To meet the future local need for housing and the Borough's share of London's need	To maintain and enhance good access to health, education, sports, leisure and other public amenities for Borough residents	To protect and enhance the quality of built design, townscape quality, local character and the Borough's historic environment	Avoid discrimination against equalities groups; promotes climate justice, (cuts) deprivation; promotes healthy balanced communities
PROPOSED PLAN OBJECTIVES												
(12) Reduce and mitigate environmental impacts including from pollution (such as air, noise, light, odour, fumes, water and soil) and secure improvements in air quality.	✓✓	✓✓	✓	✓✓				✓✓				✓✓
Sutton's Economy and Employment												
(13) To ensure strong and fair economic growth by safeguarding and intensifying appropriate land and buildings for business and employment use. .	✓				✓	✓✓	✓	✓	✓			✓✓
(14) To promote the reconfiguration and intensification of industrial land and premises, promote the circular economy, create opportunities for new businesses to relocate within the borough and existing business to expand	✓✓		✓		✓	✓✓	✓	✓✓				✓✓
(15) To support enhancements to the boroughs digital infrastructure and connectivity to support existing and new business and homes in Sutton.	✓			✓		✓✓		✓	✓			✓✓
(16) To unlock growth in the life sciences sector and create high-value employment opportunities within the London Cancer Hub in partnership with local education providers, the health/life sciences sector and the Innovation Gateway.	✓✓	✓			✓	✓✓	✓	✓✓				✓✓

SA FRAMEWORK OBJECTIVES												
	(A) Environmental Sustainability				(B) Sustainable Economic Growth				(C) Sustainable Communities and Equalities			
KEY	(1) Climate Change Mitigation/ Net Zero	(2) Flood Risk and Water Resources	(3) Open Space, Urban Greening and BNG	4) Sustainable Transport, Healthy Streets & Air Quality	(5) Town Centres	(6) Sustainable Economic Growth,	(7) Urban Regeneration and Urban Renewal	(8) Green Economy; Decarbonisation and Retrofit	(9) Access to Housing	(10) Social and Community Infrastructure	(11) Built and Historic Environment	(12) Equalities, Deprivation, Health and Climate Justice
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Sutton's High Streets and Centres												
(17) Increase the viability and vitality of Sutton's network of town, district and local centres to create resilient destinations that successfully and demonstrably meet the community, retail, leisure and housing needs of the borough's residents. .				✓✓	✓✓	✓✓	✓✓		✓	✓✓		✓✓
(18) To redevelop the St Nicholas Centre and Civic Centre sites as a catalyst for wider regeneration of Sutton Town Centre.				✓	✓✓	✓✓	✓✓		✓✓	✓✓	✓✓	✓✓
(19) To deliver an improved layout for the town centre gyratory allowing for easier access into and around our High Street for walking, cycling and sustainable transport.	✓✓			✓✓	✓✓	✓✓	✓✓	✓✓			✓	✓✓
(20) To enhance the quality of the public realm and the shopping environment across Sutton's town centre network, while providing for high quality retail and office floorspace, accommodating housing growth, providing excellent transport links; protecting and enhancing heritage assets and improving the town centre's cultural offer.		✓✓	✓	✓✓	✓✓	✓✓	✓✓			✓✓	✓✓	✓✓
Sutton's Movement												
(21) To improve sustainable transport within the borough from all sources to encourage residents to make more sustainable travel choices.	✓✓			✓✓		✓✓		✓✓				✓✓
(22) To enhance footpaths and cycling routes to encourage walking and cycling.	✓✓		✓	✓✓	✓	✓✓	✓	✓✓			✓	✓✓

SA FRAMEWORK OBJECTIVES												
	(A) Environmental Sustainability				(B) Sustainable Economic Growth				(C) Sustainable Communities and Equalities			
KEY	(1) Climate Change Mitigation/ Net Zero	(2) Flood Risk and Water Resources	(3) Open Space, Urban Greening and BNG	4) Sustainable Transport, Healthy Streets & Air Quality	(5) Town Centres	(6) Sustainable Economic Growth,	(7) Urban Regeneration and Urban Renewal	(8) Green Economy; Decarbonisation and Retrofit	(9) Access to Housing	(10) Social and Community Infrastructure	(11) Built and Historic Environment	(12) Equalities, Deprivation, Health and Climate Justice
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PROPOSED PLAN OBJECTIVES												
(23) To implement the Belmont Rail Frequency Improvement Scheme and continue to lobby the government, the Mayor and TfL for further transport infrastructure funding	✓			✓ ✓	✓	✓ ✓	✓	✓				✓ ✓
(24) To support the move towards low carbon transport. This includes supporting electric vehicles by increasing charging infrastructure across the borough	✓ ✓			✓ ✓	✓	✓ ✓	✓	✓ ✓				✓ ✓

8. DEVELOPING PREFERRED OPTIONS 1: STRATEGIC ALTERNATIVES AND DRAFT POLICIES (TASK B2)

KEY CHALLENGES

8.1 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.

IDENTIFICATION OF ISSUES, PREFERRED OPTIONS AND DRAFT POLICIES

8.2 The Local Plan 'Issues and Preferred Options' (Regulation 18) document identifies 57 distinct Local Plan Issues as set out in Table 8.1 below. 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.

8.3 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.

Table 8.1: Local Plan Issues, Preferred Options and Draft Policies

Local Plan Issue	Presentation of Issue and Options	Consultation Questions																		
Strategic Policies: borough-wide																				
ISSUE 1: ESTABLISHING SUTTON'S GROWTH NEEDS	<p>Strategic Options for Housing: Net additional homes per year</p> <table border="1" data-bbox="396 350 1539 522"> <tr> <td data-bbox="396 350 779 522"> Option A <ul style="list-style-type: none"> Minimum 469 units to 2029 Minimum 403 units from 2029 - 2041 (current London Plan target for Sutton) </td> <td data-bbox="779 350 1161 522"> Option B: <ul style="list-style-type: none"> Minimum of 650 units (uplift on current London Plan target and is broadly equivalent to Sutton's housing need figure before national urban uplift applied) </td> <td data-bbox="1161 350 1539 522"> Option C: <ul style="list-style-type: none"> Minimum of 886 units (This represents Sutton's capped housing need figure) </td> </tr> </table> <p>Strategic Options for Industry floorspace (building footprint to plot ratio of 65%)</p> <table border="1" data-bbox="396 572 1539 685"> <tr> <td data-bbox="396 572 779 685"> Option A: <ul style="list-style-type: none"> 100,000 sq.m. (based on past trends projection) </td> <td data-bbox="779 572 1161 685"> Option B: <ul style="list-style-type: none"> 166,760 sq.m (based on meeting need in full) </td> <td data-bbox="1161 572 1539 685"> Option C: <ul style="list-style-type: none"> 166,760 sq.m (based on exceeding need) </td> </tr> </table> <p>Strategic Options for Office floorspace</p> <table border="1" data-bbox="396 736 1539 848"> <tr> <td data-bbox="396 736 779 848"> Option A: <ul style="list-style-type: none"> Minimum 15,000 sq.m. (First 5 to 10 years of plan period) </td> <td data-bbox="779 736 1161 848"> Option B: <ul style="list-style-type: none"> 56,620 sq.m (floorspace to job ratio of 7.4 sq.m) </td> <td data-bbox="1161 736 1539 848"> Option C: <ul style="list-style-type: none"> 81,583 sq.m (floorspace to job ratio of 12 sq.m) </td> </tr> </table> <p>Strategic Options for Retail floorspace</p> <table border="1" data-bbox="396 899 1539 1012"> <tr> <td data-bbox="396 899 779 1012"> Option A: <ul style="list-style-type: none"> 1,340 sq.m. (Convenience Retail) </td> <td data-bbox="779 899 1161 1012"> Option B: <ul style="list-style-type: none"> 1,340 sq.m (Convenience Retail) </td> <td data-bbox="1161 899 1539 1012"> Option C: <ul style="list-style-type: none"> 1,340 sq.m. + (Convenience Retail) </td> </tr> </table> <p>Strategic Options for Food and Beverage floorspace</p> <table border="1" data-bbox="396 1062 1539 1175"> <tr> <td data-bbox="396 1062 779 1175"> Option A: <ul style="list-style-type: none"> 12,472 sq.m. (meeting need in full) </td> <td data-bbox="779 1062 1161 1175"> Option B: <ul style="list-style-type: none"> 12,472 sq.m. +(exceeding need) </td> <td data-bbox="1161 1062 1539 1175"> Option C: <ul style="list-style-type: none"> 12,472 sq.m. +(exceeding need) </td> </tr> </table> <p>Strategic Options for Infrastructure</p> <table border="1" data-bbox="396 1225 1539 1338"> <tr> <td data-bbox="396 1225 779 1338"> Option A: <ul style="list-style-type: none"> Metroisation & improved bus services. New Healthcare facilities. Retain safeguarded primary school in Sutton TC </td> <td data-bbox="779 1225 1161 1338"> Option B: <ul style="list-style-type: none"> Metroisation & improved bus services. New Healthcare facilities. Retain safeguarded primary school in Sutton TC </td> <td data-bbox="1161 1225 1539 1338"> Option C: <ul style="list-style-type: none"> Sig. public transport improvements. New healthcare facilities. New primary and secondary schools </td> </tr> </table>	Option A <ul style="list-style-type: none"> Minimum 469 units to 2029 Minimum 403 units from 2029 - 2041 (current London Plan target for Sutton) 	Option B: <ul style="list-style-type: none"> Minimum of 650 units (uplift on current London Plan target and is broadly equivalent to Sutton's housing need figure before national urban uplift applied) 	Option C: <ul style="list-style-type: none"> Minimum of 886 units (This represents Sutton's capped housing need figure) 	Option A: <ul style="list-style-type: none"> 100,000 sq.m. (based on past trends projection) 	Option B: <ul style="list-style-type: none"> 166,760 sq.m (based on meeting need in full) 	Option C: <ul style="list-style-type: none"> 166,760 sq.m (based on exceeding need) 	Option A: <ul style="list-style-type: none"> Minimum 15,000 sq.m. (First 5 to 10 years of plan period) 	Option B: <ul style="list-style-type: none"> 56,620 sq.m (floorspace to job ratio of 7.4 sq.m) 	Option C: <ul style="list-style-type: none"> 81,583 sq.m (floorspace to job ratio of 12 sq.m) 	Option A: <ul style="list-style-type: none"> 1,340 sq.m. (Convenience Retail) 	Option B: <ul style="list-style-type: none"> 1,340 sq.m (Convenience Retail) 	Option C: <ul style="list-style-type: none"> 1,340 sq.m. + (Convenience Retail) 	Option A: <ul style="list-style-type: none"> 12,472 sq.m. (meeting need in full) 	Option B: <ul style="list-style-type: none"> 12,472 sq.m. +(exceeding need) 	Option C: <ul style="list-style-type: none"> 12,472 sq.m. +(exceeding need) 	Option A: <ul style="list-style-type: none"> Metroisation & improved bus services. New Healthcare facilities. Retain safeguarded primary school in Sutton TC 	Option B: <ul style="list-style-type: none"> Metroisation & improved bus services. New Healthcare facilities. 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ISSUE 2: SPATIAL STRATEGY	<p>Strategic Options for Spatial Strategy</p> <table border="1" data-bbox="396 1397 1539 1819"> <tr> <td data-bbox="396 1397 779 1819"> Option 1 - Sutton Town Centre First <ul style="list-style-type: none"> Sutton Town Centre accommodates the vast majority of the borough's growth including, housing, retail, offices, other town centres uses and associated infrastructure. The seven District Centres accommodate smaller levels of development. Limited development in suburban heartlands Industrial development accommodated in Strategic Industrial Areas. The London Cancer Hub delivers significant medical research floorspace and potentially a new hospital. </td> <td data-bbox="779 1397 1161 1819"> Option 2- Sutton Town & District Centre Network <ul style="list-style-type: none"> Sutton Town Centre still accommodates high levels of growth but significant amounts are also accommodated across Sutton's District Centre network. Appropriate levels of development within suburban areas, predominantly for residential uses. Industrial development is largely accommodated in SILs but with some new areas designated. The London Cancer Hub delivers significant medical research floorspace and potentially a new hospital. </td> <td data-bbox="1161 1397 1539 1819"> Option 3 - Dispersed Development <ul style="list-style-type: none"> Sutton Town Centre accommodates most of the borough's development needs but the District Centres and the suburban heartlands also accommodate significant levels of development. 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. </td> </tr> </table>	Option 1 - Sutton Town Centre First <ul style="list-style-type: none"> Sutton Town Centre accommodates the vast majority of the borough's growth including, housing, retail, offices, other town centres uses and associated infrastructure. The seven District Centres accommodate smaller levels of development. Limited development in suburban heartlands Industrial development accommodated in Strategic Industrial Areas. The London Cancer Hub delivers significant medical research floorspace and potentially a new hospital. 	Option 2- Sutton Town & District Centre Network <ul style="list-style-type: none"> Sutton Town Centre still accommodates high levels of growth but significant amounts are also accommodated across Sutton's District Centre network. Appropriate levels of development within suburban areas, predominantly for residential uses. Industrial development is largely accommodated in SILs but with some new areas designated. The London Cancer Hub delivers significant medical research floorspace and potentially a new hospital. 	Option 3 - Dispersed Development <ul style="list-style-type: none"> Sutton Town Centre accommodates most of the borough's development needs but the District Centres and the suburban heartlands also accommodate significant levels of development. Industrial development is largely accommodated in Strategic Industrial Areas but with some new areas designated. The London Cancer Hub delivers significant medical research floorspace and potentially a new hospital. 	<p>A. Which spatial strategy do you support? B. Can you think of any other strategy that should be considered?</p>															
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ISSUE 3: NET ZERO CARBON	<p>Draft Policy</p>	<p>A. Do you agree with the draft policy on Net Zero? If you do not support the draft policy, please give reasons and where possible suggest alternatives</p>																		
ISSUE 4: NATURAL FLOOD RISK MANAGEMENT AND MAKING SPACE FOR WATER	<p>Draft Policy</p>	<p>B. Do you agree with the draft policy on Natural Flood Risk Management and Making Space for Water? If you do not support the draft policy, please give reasons and where possible suggest alternatives</p>																		
ISSUE 5: URBAN GREENING AND CLIMATE CHANGE ADAPTATION	<p>Draft Policy</p>	<p>A. Do you agree with the draft policy on Urban Greening and Climate Change Adaptation ? If you do not support the draft policy, please give reasons and where possible suggest alternatives</p>																		
ISSUE 6: BIODIVERSITY AND HABITATS	<p>Draft Policy incorporating the following Strategic Options for Biodiversity and Habitats in Part (b)</p> <ul style="list-style-type: none"> Preferred Option (All Options 1-4 inclusive): Set a range of strategic biodiversity targets incorporating Options 1, 2, 3 and 4 (see below) and which are aligned with the relevant Local Nature Recovery Plan targets for LB Sutton. <table border="1" data-bbox="396 2347 1539 2599"> <tr> <td data-bbox="396 2347 684 2599"> Option 1 <ul style="list-style-type: none"> Sutton Habitat creation Set updated targets for the creation and enhancement of key habitats which are aligned with Local Nature Recovery Plan targets (ha). </td> <td data-bbox="684 2347 972 2599"> Option 2 <ul style="list-style-type: none"> Sutton Protecting SINC's Set targets for maintaining the number, total area and extent of SINC's within the borough and for reducing areas of deficiency to SINC's. </td> <td data-bbox="972 2347 1260 2599"> Option 3 <ul style="list-style-type: none"> Sutton Increasing biodiversity value (borough) Set an evidence-based target for achieving an uplift in the overall biodiversity value of the borough (Statutory Metric). </td> <td data-bbox="1260 2347 1539 2599"> Option 4 <ul style="list-style-type: none"> Sutton Increasing biodiversity value (specific areas) Set a number of evidence-based targets for achieving an uplift in the biodiversity value of specific areas of the borough (Statutory Metric). </td> </tr> </table>	Option 1 <ul style="list-style-type: none"> Sutton Habitat creation Set updated targets for the creation and enhancement of key habitats which are aligned with Local Nature Recovery Plan targets (ha). 	Option 2 <ul style="list-style-type: none"> Sutton Protecting SINC's Set targets for maintaining the number, total area and extent of SINC's within the borough and for reducing areas of deficiency to SINC's. 	Option 3 <ul style="list-style-type: none"> Sutton Increasing biodiversity value (borough) Set an evidence-based target for achieving an uplift in the overall biodiversity value of the borough (Statutory Metric). 	Option 4 <ul style="list-style-type: none"> Sutton Increasing biodiversity value (specific areas) Set a number of evidence-based targets for achieving an uplift in the biodiversity value of specific areas of the borough (Statutory Metric). 	<p>A. Do you agree with the draft policy on Biodiversity and Habitats? B. Which policy option do you prefer and why? If you do not support the provisions of the draft policy, please give reasons and where possible suggest alternatives</p>														
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ISSUE 7: STRATEGIC TRANSPORT INFRASTRUCTURE	<p>Draft Policy</p>	<p>A. Do you agree with the retention of the safeguarded alignment for Sutton Link? Should the Council retain the safeguarding for Phase 2? B. Do you agree with the draft policy on major transport proposals? If you do not support the draft policy, please give reasons and where possible suggest alternatives.</p>																		

Local Plan Issue	Presentation of Issue and Options		Consultation Questions
Strategic Policies: Area Strategies			
ISSUE 8: LONDON CANCER HUB	Draft Policy		<p>A. Do you agree / disagree with the draft policy principles for the LCH?</p> <p>B. Do you agree / disagree that the LCH site should have an overarching plan for all of the site?</p> <p>C. Do you agree with the Council's approach to not allow residential development on the site, with accommodation restricted to ancillary and subject to restrictions and occupancy criteria?</p> <p>D. Should the Council set criteria to make sure that employment floorspace delivered at the LCH site is specifically for laboratory, research & development, and ancillary offices?</p> <p>E. Should the Council allow jobs and floorspace delivered on the LCH site to contribute towards meeting its identified needs within the borough? Please give reasons and where possible suggest alternatives</p>
ISSUE 9: SUTTON TOWN CENTRE	Draft Policy Principles set out for: <ul style="list-style-type: none"> • New Housing; • Retail and Town Centre Uses; • Modern Office Spaces; • Leisure and Food & Beverage Spaces • Community Uses; 		<ul style="list-style-type: none"> • Transport and Sutton Link; • Transforming the Gyratory; • Tall Buildings; • Heritage; • Infrastructure <p>A. Do you support the overall principles that will be used to inform the Sutton Town Centre Policy?</p> <p>B. Do you support the comprehensive redevelopment of the St Nicholas Centre to accommodate new housing and a range of town centre related uses? Which uses would you like to see?</p> <p>C. Do you support new office space in Sutton Town Centre?</p> <p>D. Do you support additional leisure facilities in the town centre? What type of leisure uses does the town centre need?</p> <p>E. What types of food and beverage provision is missing and what would you like to see?</p> <p>F. Do you support the proposals to improve the gyratory and east-west connections across the town centre?</p> <p>G. Do you support tall buildings in appropriate locations in the Town Centre?</p> <p>H. Do you support the approach to heritage assets in the Town Centre?</p> <p>I. Do you have any further views of Sutton Town Centre proposals and principles? Is anything missing and are there any alternative options?</p> <p>Where possible, please give reasons in response to the above questions</p>
ISSUE 10: DISTRICT CENTRES STRATEGY	Draft Policy Principles and Proposals set out for: <ul style="list-style-type: none"> • Carshalton; • Cheam; • Hackbridge; • North Cheam; 		<ul style="list-style-type: none"> • Rosehill; • Worcester Park; • Wallington <p>A. Do you agree with the draft policy and proposals for the District Centres?</p> <p>B. If you do not support the draft policy and proposals, please give reasons and where possible suggest alternatives.</p> <p>C. Can you suggest additional sites and proposals?</p>
ISSUE 11: WANDLE VALLEY STRATEGY	Draft Policy Principles and Proposals set out for: <ul style="list-style-type: none"> • new housing • new shops • new employment • new infrastructure • new open space 		<ul style="list-style-type: none"> • better transport • better environment • community initiatives • the River Wandle <p>A. Do you support the continuation of the Wandle Valley Area Strategy, its proposals and projects?</p> <p>B. Can you suggest any additional sites or proposals?</p> <p>If you do not support the draft policy, please give reasons and where possible suggest alternatives.</p>
Meeting Sutton's Housing Needs			
ISSUE 12: STRATEGIC HOUSING REQUIREMENTS	Draft policy:		<p>A. Do you agree with the draft policy principles for housing issues?</p> <p>B. Is there an alternative approach that could be taken?</p> <p>C. Please give reasons and where possible suggest alternatives.</p>
ISSUE 13: HOUSING DENSITY	Draft policy incorporating the following policy options: <p>(1) <u>General approach to density:</u></p> <ul style="list-style-type: none"> • Option 1a (aligns with Spatial Strategy Option 1 'Sutton Town Centre') - Very High Density in Sutton Town Centre and its API. - Medium Density in the District Centres and their APIs. - Low Density in Suburban Heartlands. • Option 1b (aligns with Spatial Strategy Option 2 'Sutton Town Centre and District Centre Network') - High density in Sutton Town Centre and its API. - High to medium density in District Centre and its API. - Lower density in Suburban Heartlands. • Option 1c - aligns with Spatial Strategy Option 3 'Dispersed Development' - High to medium density in Sutton Town Centre and its API. - Medium density in the District Centres and their APIs. - Medium to low density in Suburban Heartlands <p>(2) <u>Coverage of Areas of Potential Intensification</u></p> <ul style="list-style-type: none"> • Option 2a - The London Plan Approach Intensification of housing should be directed to sites with existing or planned public transport access levels (PTALs) 3-6 or located within 800m distance of a station or town centre and district centre boundary. • Option 2b - A Local Approach Intensification of housing be directed to sites with existing or planned public transport access levels (PTALs) 4-6, located within 800m distance of Sutton Town Centre and 400m from a District Centre boundary 		<p>A. Which policy option 1a, 1b or 1c do you prefer?</p> <p>B. Do you agree with the draft policy on housing density directing higher density housing into the Areas of Potential Intensification?</p> <p>C. Do you agree the Adopted Local Plan should apply an Area of Potential Intensification for 800m from Sutton Town Centre and 400m from District Centres as a better reflection of local character than the London Plan (2021) applies?</p> <p>D. If you do not support the provisions of the draft policy, please give reasons and where possible suggest alternatives.</p>
ISSUE 14: AFFORDABLE HOUSING	Draft Policy and Policy Options <p>For development sites that deliver 10 dwellings or more, or which have a gross internal floorspace of 1000m²:</p> <ul style="list-style-type: none"> • Option 1a: seek 35% affordable housing on-site, in accordance with the minimum requirements as defined by the threshold approach for major development proposals set out in London Plan Policy H5; or • Option 1b: seek 40% affordable housing on-site, representing an up-lift from the London Plan minimum requirement for major development proposals, aligning more strongly with the Council's Corporate Plan, which has delivering quality and affordable housing as one of its' six priorities; or 		<p>Tenure split options:</p> <ul style="list-style-type: none"> • Option 2a: a tenure split which achieves 70% low-cost rented products, including social rent and affordable rent; and 30% immediate products, which will include a minimum of 25% First Homes, and other forms of shared ownership. This option balances the delivery of different tenure types and likely viability, but responds to the LHNA evidence that indicates a greater requirement for low-cost rented products in Sutton; or • Option 2b: a tenure split which achieves 85% low-cost rented products, including social rent and affordable rent; and 15% immediate products. This option emphasises the need for low-cost rented products in Sutton, and would require that 50% (of the 85%) would be affordable rental products and the remaining to be other social rent products <p>A. Do you agree with the Council's overall approach to maximise the delivery of affordable housing?</p> <p>B. Should the Council consider increasing its overall housing requirement figure in order to increase the potential delivery of affordable housing?</p> <p>C. Should the Council set a higher affordable housing percentage target for on-site delivery? Which of the three options do you consider is the most appropriate?</p> <p>D. The Council's evidence indicates it should focus the affordable housing tenure split more towards the delivery of rented affordable housing rather than intermediate or affordable home ownership products. Do you support the Council's approach?</p>

Local Plan Issue	Presentation of Issue and Options	Consultation Questions																				
	<ul style="list-style-type: none"> Option 1c: seek 50% affordable housing on-site, aligning with the strategic overall target in the London Plan, and marrying up with the minimum requirements for delivery on public sector land. This option would allow Sutton to better meet its identified affordable housing need 	<p>E. The Council has set out two options for the tenure split of on-site affordable housing. Which of the two options do you consider is the most appropriate?</p> <p>A. Should the Council pursue financial contributions from smaller sites (2 - 9 dwellings), in lieu of affordable housing provision? What should the financial contribution equate to, and what might it mean for development viability?</p>																				
ISSUE 15: SMALL SITES	Draft Policy	<p>A. Do you agree with the Council's overall approach to maximise the delivery of housing on small sites?</p> <p>B. Given the strong track record of delivery, should the Council consider increasing its small sites target to be above the London Plan figure?</p> <p>C. If a higher target was set, should the Council set these out as site allocations, or just work towards an annual figure or a percentage target?</p> <p>D. Should the Council pursue financial contributions from smaller sites (2 - 9 dwellings), in lieu of affordable housing provision? What should the financial contribution equate to, and what might it mean for development viability?</p> <p>E. Do you support the proposed draft policy for small sites? What changes would you make to the policy</p>																				
ISSUE 16: HOUSING MIX AND HOUSING STANDARDS	<p>Draft Policy incorporating the following options for Dwelling Sizes and Mix</p> <p>Option 1</p> <ul style="list-style-type: none"> 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; 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; 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%. <p>Option 2</p> <p>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.</p> <p>Table 16.2 - Indicative Housing Mix</p> <table border="1"> <thead> <tr> <th>Tenure</th> <th>1 Bed</th> <th>2 Bed</th> <th>3 Bed</th> <th>4+ bed</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> <ul style="list-style-type: none"> 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. 	Tenure	1 Bed	2 Bed	3 Bed	4+ bed	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%	<p>A. Do you agree with the draft policy on housing mix and housing standards?</p> <p>B. Which dwelling size options do you prefer, Option 1 or Option 2? Please give reasons.</p> <p>C. If you do not support the provisions of the draft policy, please give reasons and where possible suggest alternatives</p>
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Affordable Housing (Rented)	30-35%	30-35%	25-30%	5-10%																		
ISSUE 17: LOSS OF HOUSING AND CONVERSIONS	Draft Policy covering	<ul style="list-style-type: none"> Loss of housing; and Conversions 	<ul style="list-style-type: none"> Do you agree with the draft policy on loss of housing and conversions Is the threshold of 130m² correct? Should a different threshold be used? <p>If you do not support the provisions of the draft policy, please give reasons and where possible suggest alternatives.</p>																			
ISSUE 18: BUILD TO RENT	Draft Policy		<p>A. Do you agree with the draft policy on Build to Rent?</p> <p>B. Do you agree that the Council should seek to prioritise London Living Rent or are other products more suitable?</p> <p>If you do not support the provisions of the draft policy, please give reasons and where possible suggest alternatives.</p>																			
ISSUE 19: CO-LIVING HOUSING	<p>Policy Options</p> <p>Option 1 - A Local Approach to Co-Living Developments</p> <p>(a) Development proposals for co-living housing will only be supported where it can be demonstrated that:</p> <ol style="list-style-type: none"> It is not proposed on a site that is suitable for residential accommodation under Use Class C3, having regard to: <ol style="list-style-type: none"> whether a proposal would displace existing C3 residential accommodation; whether a site has been identified in the Local Plan housing trajectory and/or Housing and Economic Land Availability Assessment as having capacity for C3 housing; whether the site is allocated for C3 residential use in the development plan; and whether a site has an extant planning permission for C3 housing. there is a genuine need and demand for co-living housing in the borough; co-living housing is better suited to meeting the local housing needs than conventional housing; 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 it is located in Sutton Town Centre, as defined on the policies map <p>(b) Where the criteria for housing can be met, in line with Part (a)(i to v) above, development proposals must:</p> <ol style="list-style-type: none"> meet the requirements of London Plan Policy H16 'Large-scale purpose-built shared living'; and 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 be under single management. <p>(c) Development proposals for housing must contribute towards the delivery of affordable housing. Specifically, proposals must:</p> <ol style="list-style-type: none"> 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 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' <p>Option 2 - the London Plan Approach to Co-Living Development 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'</p>	<p>A. Do you agree with the draft policy on Co-Living Housing?</p> <p>B. Where Co-Living schemes come forward, what minimum space standards should the Council apply?</p> <p>If you do not support the provisions of the draft policy, please give reasons and where possible suggest alternatives.</p>																				
ISSUE 20: HOUSES IN MULTIPLE OCCUPATION	Draft Policy		<p>A. Do you agree with the draft policy on HMOs?</p> <p>B. If you do not support the provisions of the draft policy, please give reasons and where possible suggest alternatives.</p>																			
ISSUE 21: OLDER PERSONS AND SPECIALIST ACCOMMODATION	Draft Policy		<p>A. Do you agree with the policy principles on older persons, specialist and supported housing, as set out by the Council?</p> <p>B. Do you agree with the draft policy on older persons, specialist and supported housing, as set out by the Council?</p> <p>C. Do you agree that the Council should require 10% of all new dwellings to be compliant with Part M4(3) of the Buildings Regulations in order to meet the 'wheelchair accessible' standard?</p> <p>D. Do you agree that older persons, specialist and supported housing should provide affordable housing (subject to viability)?</p> <p>E. Do you agree that the Council should identify specific sites that will deliver specialist and supported accommodation, and allocate these in the Local Plan Review?</p> <p>F. If you do not support the policy principles or the draft policy, please give reasons and where possible suggest alternatives</p>																			
ISSUE 22: GYPSY AND TRAVELLER ACCOMMODATION	Draft Policy		<p>A. Do you agree with the Council's position on the need for new Gypsy and Traveler sites? Please give reasons, if possible.</p> <p>B. Do you agree with the draft policy on Gypsy and Traveller Accommodation? Please give reasons, if possible.</p>																			
ISSUE 23: HOUSING AND GARDEN LAND	Draft Policy		<p>A. Do you agree with the draft policy on houses and garden land? Please give reasons, if possible.</p> <p>B. Do you agree the Council should seek to restrict the use of artificial lawns?</p> <p>C. If you do not support the provisions of the draft policy, please give reasons and where possible suggest alternatives.</p>																			

Local Plan Issue	Presentation of Issue and Options			Consultation Questions				
Growing Suttons Employment Offer								
ISSUE 24: EMPLOYMENT LAND AND WASTE MANAGEMENT	<p>Policy Options</p> <table border="1" data-bbox="394 320 1539 914"> <tr> <td data-bbox="394 320 762 914"> <p>Option 1 - Conventional Intensification</p> <ul style="list-style-type: none"> Continue to protect existing designated SIL and EILs. Support the intensification of existing sites to provide additional industrial floorspace and make more efficient use of limited employment land. Options for preferred plot ratios are: <ul style="list-style-type: none"> - 40% (current local plan standard) - 65% (London Plan standard) - 100% ELENA consideration Develop former waste sites that have been released from waste safeguarding for industrial uses. Refuse applications which would result in further employment land losses. Not supporting co-location schemes in SILs. Continue DtC with neighbouring boroughs, particularly Croydon. </td> <td data-bbox="762 320 1140 914"> <p>Option 2: Multi-storey Intensification</p> <ul style="list-style-type: none"> Continue to protect existing designated SIL and EILs. Pro-active policy to support multi-storey intensification as a means of delivering additional industrial floorspace within existing sites. Policy approach could require developers to justify why this form of development is unsuitable and/or unviable to deliver to try and make the most efficient use of land. Develop former waste sites that have been released from waste safeguarding for multi-storey industrial uses. Refuse applications which would result in further employment land losses. Not supporting co-location schemes in SILs Continue DtC with neighbouring boroughs, particularly Croydon. </td> <td data-bbox="1140 320 1539 914"> <p>Option 3: Intensification and New Sites</p> <ul style="list-style-type: none"> Continue to protect existing designated SIL and EILs. Proactively support intensification of existing sites to help meet industrial need. De-designate MOL at land to the west of Beddington Lane (2.04ha) and land at Jessops Way (2.09ha) and allocate for industrial uses. Continue to explore the possibility of expanding the Kimpton SIL into the adjacent supermarket site. Develop former waste sites that have been released from waste safeguarding for multi-storey industrial uses. Refuse applications which would result in further employment land losses. Not supporting co-location schemes in SILs Continue DtC with neighbouring boroughs, particularly Croydon. </td> </tr> </table>			<p>Option 1 - Conventional Intensification</p> <ul style="list-style-type: none"> Continue to protect existing designated SIL and EILs. Support the intensification of existing sites to provide additional industrial floorspace and make more efficient use of limited employment land. Options for preferred plot ratios are: <ul style="list-style-type: none"> - 40% (current local plan standard) - 65% (London Plan standard) - 100% ELENA consideration Develop former waste sites that have been released from waste safeguarding for industrial uses. Refuse applications which would result in further employment land losses. Not supporting co-location schemes in SILs. Continue DtC with neighbouring boroughs, particularly Croydon. 	<p>Option 2: Multi-storey Intensification</p> <ul style="list-style-type: none"> Continue to protect existing designated SIL and EILs. Pro-active policy to support multi-storey intensification as a means of delivering additional industrial floorspace within existing sites. Policy approach could require developers to justify why this form of development is unsuitable and/or unviable to deliver to try and make the most efficient use of land. Develop former waste sites that have been released from waste safeguarding for multi-storey industrial uses. Refuse applications which would result in further employment land losses. Not supporting co-location schemes in SILs Continue DtC with neighbouring boroughs, particularly Croydon. 	<p>Option 3: Intensification and New Sites</p> <ul style="list-style-type: none"> Continue to protect existing designated SIL and EILs. Proactively support intensification of existing sites to help meet industrial need. De-designate MOL at land to the west of Beddington Lane (2.04ha) and land at Jessops Way (2.09ha) and allocate for industrial uses. Continue to explore the possibility of expanding the Kimpton SIL into the adjacent supermarket site. Develop former waste sites that have been released from waste safeguarding for multi-storey industrial uses. Refuse applications which would result in further employment land losses. Not supporting co-location schemes in SILs Continue DtC with neighbouring boroughs, particularly Croydon. 	<p>A. Which options for employment / industrial need do you support? Please give your reasons where possible.</p> <p>B. Are there any other options or any alternative strategy you would like to propose?</p>	
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ISSUE 25: INDUSTRIAL USES	<p>Draft Policy</p>			<p>A. Do you agree with the draft policy on industrial uses?</p> <p>B. If you do not support the provisions of the draft policy, please give reasons and where possible suggest alternatives.</p>				
ISSUE 26: OFFICE DEVELOPMENT	<p>Policy options</p> <table border="1" data-bbox="394 1062 1539 2234"> <tr> <td data-bbox="394 1062 951 1611"> <p>Office Option 1 Policy to meet office floorspace in full (81,583 sq.m.)</p> <ul style="list-style-type: none"> Acknowledges and applies the national 'floorspace to job' ratio of 12m². Would identify site allocations to achieve the maximum forecast office floorspace, with a deliberate choice to allocate sites for Use Class E(g). Sutton Town Centre would be the focus for the majority of office floorspace (70% ≈ 57,108 sq.m.). Floorspace would be achieved through identified office zones and site allocations with specific requirements for Use Class E(g). The seven District Centres would also serve as identified locations for planned office floorspace (30% ≈ 24,475 sq.m.). Floorspace would be achieved through identified site allocations with specific requirements for Use Class E(g). 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Do you agree that office floorspace delivered at the London Cancer Hub should contribute to meeting the overall need for office floorspace in the borough? If not, what are the reasons for treating it separately?</p> <p>F. Please give reasons and where possible suggest alternatives.</p>
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Supporting Sutton's Centres								
ISSUE 27: TOWN CENTRES AND RETAIL	<p>Draft Policy</p>			<p>A. Do you agree with the draft retail hierarchy?</p> <p>B. Which option for the location and extent of the PSAs (see Appendix 3, Maps 3.2a and 3.3a to 3.9b) do you think is the most appropriate for the town and district centres?</p> <p>C. Do you agree with the thresholds set out for when to apply the retail impact test? If not, what threshold levels should be used?</p> <p>D. Do you agree with the Council's approach to restricting hot food takeaways near primary and secondary schools? Please give reasons and where possible suggest alternatives.</p>				
Serving Sutton's Communities								
ISSUE 28: EDUCATION AND SKILLS	<p>Draft Policy</p>			<p>A. Do you agree with the draft policy on Education and Skills?</p> <p>B. Do you agree with the sites identified for SEND provision schools in the draft policy?</p> <p>C. Do you agree with the criteria used to determine the design and location of education and skills facilities in the borough? If you do not support the provisions of the draft policy, please give reasons and where possible suggest alternatives</p>				
ISSUE 29: HEALTH AND WELL-BEING	<p>Draft Policy</p>			<p>A. Do you agree with the draft policy principles on Health and Well-being?</p> <p>B. Do you support the potential site allocations for new /improvements to health facilities? If you do not support the draft policy principles, please give reasons and where possible suggest alternatives.</p>				

Local Plan Issue	Presentation of Issue and Options				Consultation Questions
ISSUE 30: SOCIAL AND COMMUNITY INFRASTRUCTURE	Draft Policy				A. Do you agree with the draft policy on Social and Community Infrastructure? If you do not support the provisions of the draft policy, please give reasons and where possible suggest alternatives.
ISSUE 31: UTILITIES AND DIGITAL INFRASTRUCTURE	Draft Policy covering • Overall Approach to Utilities and Digital Infrastructure • Design Considerations for Digital Infrastructure				A. Do you agree with the draft policy on Utilities and Digital Infrastructure? Please give reasons, if possible. If you do not support the provisions of the draft policy, please give reasons and where possible suggest alternatives
Greening Sutton					
ISSUE 32: GREEN BELT AND METROPOLITAN OPEN LAND	Draft Policy for Green Belt and Metropolitan Open Land Option 1 (a) The Council will not grant planning permission for inappropriate development in the Green Belt or Metropolitan Open Land unless other material considerations clearly outweigh the harm to the Green Belt or Metropolitan Open Land and constitute very special circumstances. The construction of new buildings and structures or the re-use of buildings and structures in the Green Belt and Metropolitan Open Land will be inappropriate unless it is for the following purposes: (i) agriculture, horticulture or animal-related businesses. (ii) appropriate facilities for outdoor sport and recreation and cemeteries. Any new buildings or structures or the re-use of buildings and structures should preserve the openness of the Green Belt or Metropolitan Open Land. (b) The Council will grant planning permission for extensions to, alterations to and the replacement of an existing building or structure in the Green Belt or Metropolitan Open Land provided that: (i) the increase in the external volume of the built form is no greater than 30% above the size of the original building or structure; and (ii) the proposals would be proportionate in relation to the existing building or structure taking into account the mass, scale and any increase in ridge height. (c) The Council will grant planning permission for redevelopment of previously developed sites comprising two or more non-ancillary buildings, excluding temporary buildings, which would: (i) not have a greater impact on the openness of the Green Belt or Metropolitan Open Land than the existing development; or (ii) meet an identified affordable housing need within the borough where the development would not cause substantial harm to the openness of the Green Belt or Metropolitan Open Land. Policy Option 2 (a) The Council will protect the Metropolitan Green Belt and Metropolitan Open Land from inappropriate development unless very special circumstances can be demonstrated in accordance with National Planning Policy and the London Plan. (b) Any extensions to, alterations to and the replacement of an existing building or structure in the Green Belt or Metropolitan Open Land should (i) result in an increase in the external volume of the built form which is no greater than 30% above the size of the original building or structure; and (ii) be proportionate in relation to the existing building or structure taking into account the mass, scale and any increase in ridge height.				A. Which policy option on Green Belt and MOL do you prefer? B. If you do not support the provisions of the draft policy options, please give reasons and where possible suggest alternatives. C. Do you support the designation of additional areas of MOL set out above and shown in Appendix 5, Schedule 5.B(i) and Maps 5.22a - 5.22g ? D. Do you support the potential deletions of Green Belt and MOL set out above and shown in Appendix 5, Schedule 5.B(iii) ? E. Do you support the proposed minor boundary changes as set out in Appendix 5, Schedule 5.A and 5.B(ii) and Maps 5.3a, 5.22h to 5.22s ? Where possible, please give reasons for your above answers.
ISSUE 33: AGRICULTURAL LAND	Draft Policy for Agricultural Land				A. Do you agree with the draft policy on Agricultural Land? If you do not support the draft policy, please give reasons, and where possible suggest alternatives.
ISSUE 34: OPEN SPACES	Draft Policy for Open Spaces				A. Do you agree with the draft policy on Open Spaces? B. Do you support the policy to protect smaller open spaces in addition to Public Open Space and Urban Green Space identified on the Policies Map? C. If you do not support the provisions of the draft policy, please give reasons and where possible suggest alternatives. D. Do you agree with potential amendments to open space designations and boundary changes set out in Appendix 5, Schedules 5E-G and Maps 5.24a-b.
ISSUE 35: BLUE AND GREEN INFRASTRUCTURE	Draft Policy for Blue and Green Infrastructure Preferred Option 1 Green space factor (GSF) requirement applies to all new-build residential developments creating at least one dwelling and all major commercial developments Option 2 GSF requirement applies to major residential and commercial developments only				A. Do you agree with the draft policy on Blue and Green Infrastructure? B. Do you support carrying forward the requirement for proposed developments to demonstrate an uplift in the Green Space Factor (GSF) score of at least +0.2 compared to the baseline score for the site and for . proposed developments on greenfield sites to achieve a score of at least 0.5? C. Do you support extending the GSF requirement to all new build residential developments creating at least one dwelling and to all major commercial developments in line with the Preferred Option?
ISSUE 36: NATURE CONSERVATION SITES AND GREEN CORRIDORS	Draft Policy on Nature Conservation Sites and Green Corridors				A. Do you agree with the draft policy on Nature Conservation Sites and Green Corridors? If you do not support the provisions of the draft policy, please give reasons and where possible suggest alternatives.
ISSUE 37: BIODIVERSITY NET GAIN	Draft Policy on Biodiversity Net Gain incorporating the following options Preferred Policy Option 1 Set a 20% BNG target for all development sites within the borough Option 2 Set a 10% BNG target for all development sites within the borough. Option 3 Set a 20% BNG target for development sites located in town centres and their surrounding areas of potential intensification (APIs) and within strategic industrial locations (SILs). Set a 10% BNG target for all other development sites within the remainder of the borough Option 4 Where wider area-based BNG targets have been established by the Council in parts of the borough which are currently deficient or score zero biodiversity units (expressed in units per hectare), set the BNG site target accordingly in order to achieve the necessary uplift in biodiversity value				A. Do you agree with the draft policy on Biodiversity Net Gain? B. Which Option do you prefer (Options 1 - 4) and why? If you do not support the provisions of the draft policy, please give reasons and where possible suggest alternatives.
Raising Sutton's Design Standards					
ISSUE 38: CHARACTER AND DESIGN	Draft Policy on Character and Design				A. Do you agree with the Council's draft policy on Character and Design? B. Are there any alternatives you could suggest? C. Where possible, please give reasons for your answer above.

Local Plan Issue	Presentation of Issue and Options		Consultation Questions
ISSUE 39: TALL BUILDINGS	Draft Policy		<p>A. Do you agree that the definition of a tall building should be 21 metres or more? Should a different threshold be used?</p> <p>B. Do you agree with locations identified as Areas of Taller Building Potential?</p> <p>C. Do you agree with the criteria identified in the draft Policy?</p> <p>D. Do you agree that the Council should have a policy approach to 'mid-rise' buildings that fall below the definition of tall buildings?</p> <p>Are there any alternative approaches you could suggest? Where possible, please give reasons for your answer above.</p>
ISSUE 40: PROTECTING AMENITY	Draft Policy		<p>A. Do you agree with the Council's draft policy on Protecting Amenity? Is there anything that could be added? Where possible, please give reasons for your answer above.</p>
ISSUE 41: HERITAGE	Draft Policy		<p>A. Do you agree with the draft policy on Heritage?</p> <p>B. If you do not support the provisions of the draft policy, please give reasons and where possible suggest alternatives.</p> <p>C. Do you have any comments on Appendices 8 and 9 identifying the borough's heritage assets?</p> <p>D. Do you think the potential additions identified in Appendix 8, Table 8.B2.2 should be locally listed?</p>
Responding to the Climate Emergency			
ISSUE 42: CARBON AND ENERGY	<p>Draft Policy for Carbon and Energy incorporating the following policy options</p> <p>Preferred Policy Option 1: Absolute energy performance targets</p> <ul style="list-style-type: none"> • Net Zero Carbon: All residential developments involving the creation of at least one self-contained dwelling and all non-residential developments > 1,000 m² GFA must be supported by an Energy Assessment and demonstrate net zero carbon standards in operation in line with the emerging UK industry definition. • Use of gas boilers: No gas boilers or any other fossil fuels are permitted on-site. • Heating demand: Space heating demand for all buildings is limited to <15kWh/m² per year. • Energy use intensity (EUI): Energy use intensity (EUI) standards are set for the following different types of residential and non-residential buildings; <ul style="list-style-type: none"> - terraced house: EUI < 35 kWh/m² per year; - low-rise apartment building: EUI < 35 kWh/m² per year; - mid-rise apartment building: EUI < 35 kWh/m² per year; - high-rise apartment building: EUI < 35 kWh/m² per year; - office building: EUI < 70 kWh/m² per year; - primary school building: EUI < 65 kWh/m² per year; - industrial building: EUI < 35 kWh/m² per year; - hotel EUI: < 160 kWh/m² per year; • Renewable energy generation Where feasible, on-site renewable energy generation must match EUI or be greater than >35 kWh/m² per year to achieve a balance with energy use. • Embodied carbon Upfront embodied carbon associated with demolition and building materials used for construction must be considered. • Thermal bridging Assured energy performance is required (e.g. 'accredited construction details' for minimising thermal bridging). • Energy offsetting Energy offsetting is used as a last resort in order to achieve net zero carbon, rather than carbon offsetting. <p>Option 2: Reducing CO₂ emissions compared to Part L 2021</p> <ul style="list-style-type: none"> • Percentage reduction compared to Part L 2021: Takes forward the approach followed by Policy SI 2 of the London Plan, the Mayor's updated Energy Assessment Guidance 2022, the current Sutton Local Plan 2018 and by most London boroughs by requiring a percentage on-site reduction in regulated CO₂ emissions for the proposed building compared to a 'notional' Part L 2021 compliant building. • Calculation of baseline emissions and use of SAP/SBEM: Requires baseline emissions or the Target Emission Rate (TER) for the Part L compliant notional building and the Dwelling or Building Emission Rate (DER or BER) to be calculated using the latest Standard Assessment Procedure (SAP) or Simplified Building Energy Model (SBEM) software for residential and non-residential buildings respectively. • On-site emissions reduction targets against Part L 2021: Sets on-site emissions reduction targets for the following different types of residential and non-residential buildings based on the recommendations of the Delivering Net Zero Study 2023; <ul style="list-style-type: none"> - terraced house EUI - 65% reduction on Part L 2021; - low-rise apartment building - 65% reduction on Part L 2021; - mid-rise apartment building - 65% reduction on Part L 2021; - high-rise apartment building - 65% reduction on Part L 2021; - office building - 25% reduction on Part L 2021; - primary school building - 35% reduction on Part L 2021; - industrial building - 45% reduction on Part L 2021; - hotel - 10% reduction on Part L 2021. • Fabric energy efficiency (step 1: be lean) Requires a 10% reduction through fabric energy efficiency measures alone (step 1: be lean) for major residential and a 15% reduction for non-residential developments in line with the Mayor's Energy Assessment Guidance 2022; • Carbon offsetting Requires the emissions reduction shortfall to be offset via a payment into the Council's carbon offset fund (as secured by a legal agreement) priced at £95 per tonne over 30 years to fund equivalent carbon reduction measures elsewhere. • Exclusion of unregulated emissions Excludes 'unregulated' emissions from embodied and whole-life carbon and relies significantly on carbon offsetting to achieve zero carbon. 		<p>A. Do you agree with the draft Policy on Carbon and Energy?</p> <p>B. Which option do you prefer and why - Option 1 or Option 2?</p> <p>If you do not support any aspect of Policy Options 1 or 2, please give reasons and where possible suggest alternatives.</p>
ISSUE 43: OVERHEATING AND COOLING	Draft Policy for Overheating and Cooling		<p>A. Do you agree with the draft policy on Overheating and Cooling? If you do not support any aspect of the draft policy please give reasons and where possible suggest alternatives.</p>
ISSUE 44: FLOOD RISK MANAGEMENT AND FLOOD RESILIENCE	Draft Policy for Flood Risk Management and Flood Resilience		<p>A. Do you agree with the draft policy on Flood Risk Management and Flood Resilience? If you do not support the provisions of the draft policy, please give reasons and where possible suggest alternatives.</p>
ISSUE 45: SUSTAINABLE DRAINAGE (SUDS)	Draft Policy for SuDS		<p>A. Do you agree with the draft policy on Sustainable Drainage (SuDS)?</p> <p>B. Do you agree with the application types / sizes that this would apply to?</p> <p>If you do not support the provisions of the draft policy, please give reasons and where possible suggest alternatives</p>
ISSUE 46: BASEMENTS	Draft Policy for Basements		<p>A. Do you agree with the draft policy on Basement Development? If you do not support the provisions of the draft policy, please give reasons and where possible suggest alternatives.</p>
ISSUE 47: AIR QUALITY	<p>Draft Policy for Air Quality incorporating the following Policy options</p> <p>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</p> <ul style="list-style-type: none"> • Referable: All planning applications which are referable to the Mayor • Requiring EIA: All large-scale proposals requiring Environmental Impact Assessment (EIA) • Planning brief: All large scale proposals which are the subject of a planning brief; • AQFA: All major development proposals located within Air Quality Focus areas. 		<p>A. Do you agree with the draft policy on Air Quality?</p> <p>B. Which Policy Option (1 or 2) do you prefer and why?</p> <p>If you do not support the provisions of the draft policy, please give reasons and where possible suggest alternatives.</p>

Local Plan Issue	Presentation of Issue and Options		Consultation Questions
	<p>Policy Option 2 - Air Quality Positive standards for large-scale developments only</p> <ul style="list-style-type: none"> Referable: All planning applications which are referable to the Mayor Requiring EIA: All large-scale proposals requiring Environmental Impact Assessment (EIA) <p>Planning brief: All large scale developments which are the subject of a planning brief; and</p>		
ISSUE 48: CONTAMINATED LAND	Draft Policy for Contaminated Land	A. Do you agree with the draft policy on Contaminated Land? If you do not support the provisions of the draft policy, please give reasons and where possible suggest alternatives.	
ISSUE 49: NOISE AND VIBRATION	Draft Policy on Noise and Vibration	A. Do you agree with the draft policy on Noise and Vibration? If you do not support the provisions of the draft policy, please give reasons and where possible suggest alternatives	
ISSUE 50: LIGHT POLLUTION	Draft Policy on Light Pollution	A. Do you agree with the draft policy on light pollution? If you do not support the provisions of the draft policy, please give reasons and where possible suggest alternative	
ISSUE 51: CONSTRUCTION IMPACTS	Draft Policy on Construction Impacts	A. Do you agree with the draft policy on Construction Impacts? If you do not support the provisions of the draft policy, please give reasons and where possible suggest alternatives.	
Improving Sutton's Sustainable Transport Network			
ISSUE 52: SUSTAINABLE TRANSPORT PROPOSALS	Draft Policy	A. Do you agree with the draft policy on transport proposals? B. Do you support the decision to move away from naming specific schemes in the policy and to focus on key strategic areas, such as the London Cancer Hub (policy 7)? C. If your answer to B is no, are there any specific significant transport improvement schemes that you feel should be included	
ISSUE 53: TRANSPORT IMPACTS	Draft Policy	A. Do you agree with the draft policy on transport impacts? If you do not support the provisions of the draft policy, please give reasons and where possible suggest alternatives.	
ISSUE 54: PARKING	Draft Policy	A. Do you agree with the draft policy on parking? B. Are there any alternative approaches that could be suggested? If you do not support the provisions of the draft policy, please give reasons and where possible suggest alternatives.	
Implementing Sutton's Local Plan			
ISSUE 55: INFRASTRUCTURE DELIVERY	Draft Policy	A. Do you agree with the draft policy on Infrastructure Delivery ? B. Do you agree with the requirement for site specific Infrastructure Assessment? What should the development threshold be? Please give reasons and where possible suggest alternatives.	
ISSUE 56: MONITORING	Draft Policy	A. Do you agree with the draft policy on Monitoring? Please give reasons and where possible suggest alternatives.	
ISSUE 57: SITE ALLOCATIONS	Draft Policy	B. Do you agree with the draft policy on Monitoring? Please give reasons and where possible suggest alternatives.	

9. DEVELOPING PREFERRED OPTIONS 2: DEVELOPMENT SITES (TASK B2)

IDENTIFICATION OF POTENTIAL SITE ALLOCATIONS

9.1 The national planning policy framework (NPPF) (December 2023) requires local plans to allocate sites to promote development and the flexible use of land, bringing forward new land where necessary, and provide detail on the form, scale, access and quantum of development where appropriate. Government Planning Practice Guidance (PPG) makes clear that the identification of potential sites should be based upon a robust and credible assessment of suitable, available and achievable land. PPG also makes clear that developers, land-owners and the local community should be involved at the earliest possible stages of Plan preparation.

9.2 Accordingly the Council has identified a wide range of possible Site Allocations for inclusion in the new Local Plan that could help accommodate development within Borough over the next 10 to 15 years. This has been done through the Strategic Housing and Economic Land Availability Assessment (SHELA), which forms part of the Local Plan evidence base. The sites have been derived from a wide range of sources, including existing allocations, sites with planning permission, sites submitted through the 'Call for Sites' process (where a wide range of stakeholders were invited to submit sites to the Council for consideration) and other sites which the Council considers may come forward for development within the next 10 to 15 years.

9.3 Site allocations are planning policies which apply to key potential development sites across the Borough and are key to delivering the Strategic Objectives and Strategic Policies of the Local Plan. They state the particular land uses the Council expects to be developed over the Local Plan period and set out site-specific requirements for new homes, jobs, transport and social infrastructure, public access routes, public open space, heritage and other land uses. Once adopted, they will broadly prescribe the development that will be permitted on a specific site and proposals for other development types will not generally be permitted.

9.4 Potential Site Allocations and possible future uses are set out in detail in Chapter 4 of the Local Plan Issues and Preferred Options (Regulation 18) document together with basic site information including address, site area, boundaries, existing uses and planning status). However, it should be noted that these sites do not constitute Local Plan proposals at this stage. They represent that first stage in identifying sufficient land to meet the long term needs of the Borough and have not yet been fully tested for availability (owner's willingness to develop or redevelop), achievability (financial viability to develop) or suitability (in conformity with other plan policies). For those sites put forward through the Call for Sites process, inclusion in the Regulation 18 document does not necessarily mean that Council agrees with the suggested use(s).

9.5 Draft Policy 57 on Site Allocations in the Regulation 18 document states that: . .

(a) The Council will grant planning permission for development in accordance with the land uses which, at the draft Plan stage, will be set out in the upper box on the second page of the site allocation, subject to the proposed development meeting the other policies in the Local Plan.

(b) In exceptional circumstances, if a proposal for social and community infrastructure or a free standing office building is submitted for a site which is not allocated for such uses, the Council may permit development for social and community infrastructure or a free standing office building contrary to the allocation

9.6 The following Consultation Questions are set out in the Regulation 18 document

A. Do you think that any of the possible sites identified in this document should **not** be developed?

B. Do you think that any of the uses potentially identified for the sites are **not** suitable?

C. Do you consider that there are any other possible sites which should be developed [and] for what use?

D. Are there any area designations within the appendices of this document which you wish to comment on

SEQUENTIAL TESTING OF POTENTIAL SITE ALLOCATIONS (SEE SECTION 11)

9.7 The potential site allocations, listed below in Table 9.1, have been subjected to the Sequential Test on the basis of the strategic flood risk assessment (SFRA) Level 1 Report (December 2023) and the outcome of this site screening process is set out in Section 11 of this document.

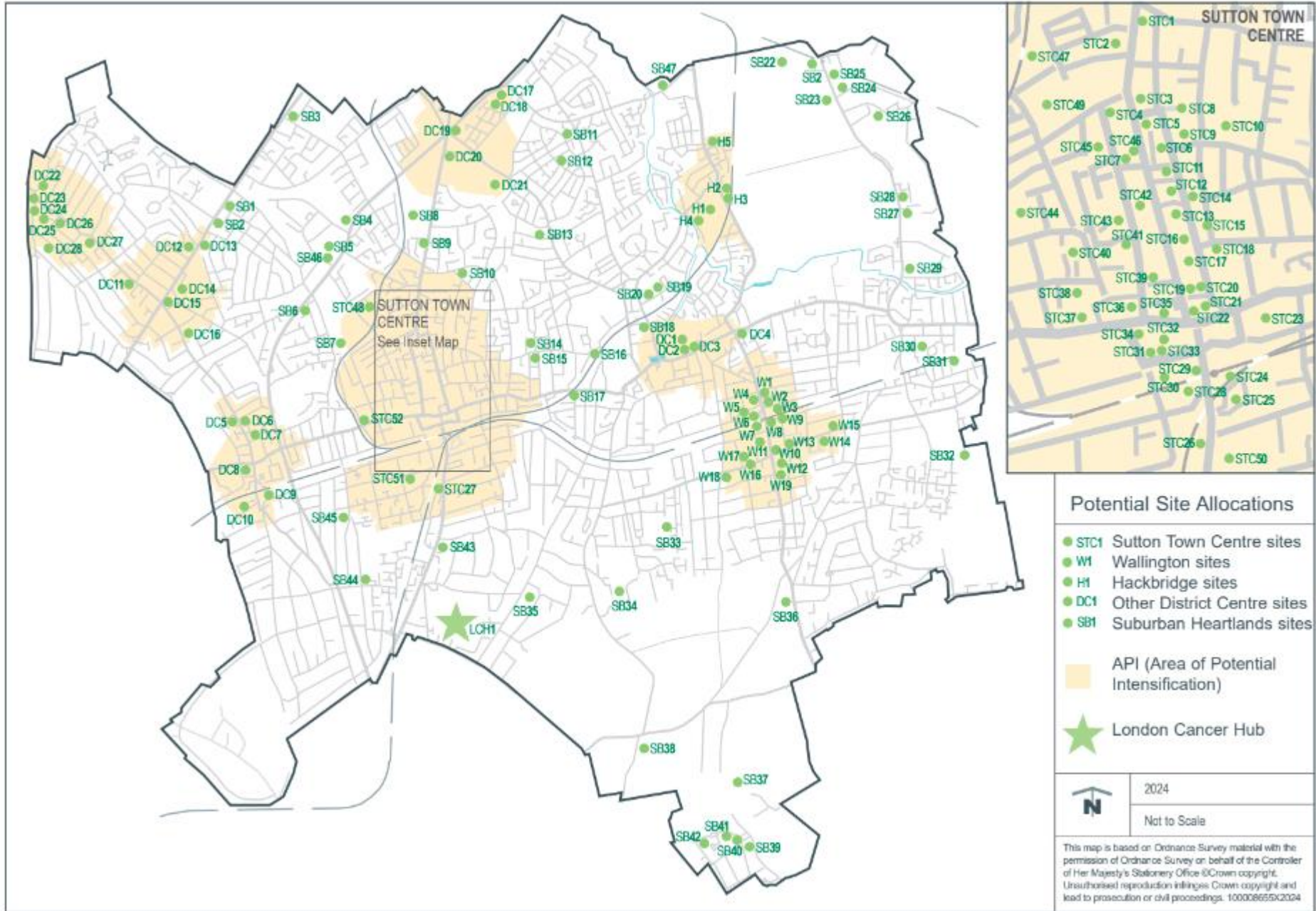


Table 9.1: Potential Site Allocations¹⁴

	Site Name	Existing Land Use	Potential Future Use
LCH1	London Cancer Hub, Downs Road / Brighton Road, Belmont, Sutton (22.6 ha)	Medical Research Campus Education (Class F1)	Medical Research; Class E Class E(g), (i), (ii), and (iii) only. ; Health ; Hospital; Education (Class F1); Hotel (Class C1); Ancillary Accomodation; Allotments
SUTTON TOWN CENTRE AND API (STC)			
STC1	Helena House, 348-352 High St, Sutton (0.14 ha)	Vacant - Previously Employment (Class E)	Residential; Class E
STC2	Former Morrison's Local and Car Park (0.15 ha)	Retail (Class E)	Residential; Class E
STC3	Lidl Block, High Street, Sutton (0.56 ha)	Employment (Class E)	Residential; Class E
STC4	Halford Block, Throwley Way, Sutton (0.27 ha)	Residential (Class C3) Class E	Residential; Class E
STC5	Northern Gateway, 246-254 High Street and 2 Marshalls Road, Sutton (0.31 ha)	Vacant - Previously Retail & Offices (Class E)	Class E; Education (Class F); Residential
STC6	Elm Grove Estate, Sutton (2.04 ha)	Residential (Class C3)	Residential
STC7	2-4 Greenford Road, Sutton (0.04 ha)	Mixed Use - Residential / Employment (Class E)	Residential; Class E
STC8	Rosebery Gardens, Sutton (0.50 ha)	Residential (Class C3)	Residential
STC9	Salvation Army Church, 45 Benhill Avenue, Sutton, (0.12 ha)	Church (Class F1)	Residential; Class E; Class F1
STC10	Benhill Estate, Sutton (0.39 ha)	Residential (Class C3)	Residential; Health (Class E)
STC11	Herald House, 17 Throwley Way, Sutton (0.05 ha)	Residential (Class C3) Employment (Class E)	Residential; Class E
STC12	Old Court House Surgery, Court House, Throwley Way, Sutton (0.15 ha)	Employment (Class E)	Residential; Class E; Health
STC13	2-4 Lodge Place, Sutton (0.40 ha)	Employment (Class E) and Car Parking (Sui Generis)	Residential; Class E
STC14	Kwitfit Site, Throwley Way, Sutton (0.09 ha)	Employment (Class B2)	Residential
STC15	Times Square Car Park, Throwley Way (0.74 ha)	Car Parking (Sui Generis)	Residential ; Car Park (Sui Generis)
STC16	Times House, Throwley Way (0.20 ha)	Employment (Class E)	Residential; Class E
STC17	Land to rear of Times Square, Throwley Way, Sutton (0.40 ha)	Vacant	Residential; Indoor Play Space (Class D1); Class E
STC18	Houses adjacent to Manor Park, Throwley Way (0.52 ha)	Residential (Class C3)	Residential; Class E
STC19	Former Wilko Site, High Street, Sutton (0.11 ha)	Employment (Class E)	Residential; Class E
STC20	Throwley Yard, Surrey House, Throwley Road, Sutton (0.13 ha)	Employment (Class E)	Class E; Other (Sui Generis)
STC21	Sutton Park House, 15 Carshalton Road, Sutton, SM1 4LD (0.26 ha)	Employment (Class E)	Residential; Class E
STC22	3-9 Carshalton Road, Sutton(0.03	Mixed Use - Residential (Class C3) / Hot Food Takeaway (Class E/SG)	Residential; Class E
STC23	B&Q Site, Sutton Court Road, Sutton, SM1 4RQ (2.26	Employment (Class E)	Residential; Class E; Health
STC24	Sutton Station and Car Park, Brighton Road, Sutton, SM2 5BW (1.24	Car Parking (Sui Generis)	Residential; Class E; Public Car Parking
STC25	Quadrant House, Brighton Road, Sutton, SM2 5AS (0.61	Employment (Class E)	Residential; Class E
STC26	Petrol Station North of SubSea7, Brighton Road, Sutton SM2 5BN (0.32 ha)	Petrol Station (Class SG)	Residential; Class E
STC27	2-4 Copse Hill and 52-54 Brighton Road, Sutton	Residential (Class C3)	Residential; Class E
STC28	Shops Opposite Sutton Station, High Street, Sutton (0.18 ha)	Employment (Class E)	Residential; Class E
STC29	1-3 High Street, Sutton (ha)	Vacant - Previously Retail (Class E) & Residential (Class C3)	Residential; Class E
STC30	Cophthall House, Grove Road, Sutton, SM1 1DA (0.07 ha)	Employment (Class E)	Residential; Class E
STC31	Land North of Grove Road (44 - 74 Grove Road), Sutton (0.18 ha)	Mixed Use - Vacant / Employment (Class E)	Residential; Class E

¹⁴ a more detailed list of potential allocations is set out in Chapter 4 of the Issues and Preferred Options (Regulation 18) document (July 2024) and the Council's Strategic Strategic Housing and Economic Land Availability Assessment (SHELA, 2023). An interactive version with site maps is available at:<https://kingston.statmap.co.uk/map/map.htmlnull>

	Site Name	Existing Land Use	Potential Future Use
STC32	Land North of Grove Road, Sutton (1.05 ha)	Residential (Class C3) Class E	Residential; Class E
STC33	36 - 50 Grove Road, Sutton (0.09 ha)	Employment (Class E)	Residential ; Class E
STC34	City House, Sutton Park Road, Sutton (0.18 ha)	Employment (Class E)	Residential; Class E
STC35	10-12 Cheam Road, Sutton (1.24 ha)	Employment (Class E)	Residential; Class E
STC36	Civic Offices, St Nicholas Way, Sutton (0.90 ha)	Employment (Class E)	Residential; Class E; Health
STC37	Former Secombe Theatre, 42 Cheam Rd, Sutton, (0.40 ha)	Vacant - Previously Employment (Class E)	Residential; Class E; Health
STC38	Gibson Road Multi-Storey Car Park, Sutton (0.67 ha)	Employment (Class E)	Residential
STC39	St Nicholas House, St Nicholas Way, Sutton (0.08 ha)	Vacant - Previously Retail & Offices (Class E)	Residential; Class E
STC40	Robin Hood Lane Health Centre, Robin Hood Lane, Sutton (0.25 ha)	Health (Class E)	Health
STC41	8-25 Beech Tree Place and 29-35 West Street, Sutton SM1 1SF/1SJ (0.42)	Residential (Class C3)	Residential
STC42	St.Nicholas Centre, St Nicholas Way, Sutton (2.10 ha)	Employment (Class E)	Retail; Offices; Library; Cafe and Restaurants; Leisure; Health; Residential; Class E; Class F1; Class F2
STC43	St.Nicholas Centre Car Park, St Nicholas Way, Sutton (0.5 ha)	Car Park (Class SG) Cinema (Class SG)	Car Park; Cinema; Residential; Class E
STC44	Sutton West Centre, Robin Hood Lane (1.10 ha)	Youth / Education Services (Class F1)	Residential; Education (Class F1)
STC45	31-35 St Nicholas Way, Sutton (0.09 ha)	Employment (Class E)	Residential; Class E
STC46	219 - 227 High Street, Sutton, SM1 1LB (Former Argos)	Employment (Class E)	Residential; Class E
STC47	Bus Garage, Bushey Road, Sutton (0.55 ha)	Bus Garage (Class SG)	Residential; Bus Garage (Sui Generis)
STC48	Chaucer Estate, Milton Road, Sutton (3.06 ha)	Residential	Residential; Class E; Health
STC49	Collingwood Estate, Sutton, Collingwood Road, Sutton (2.83 ha)	Residential	Residential; Class E; Health
STC50	Sutton Court Estate, Brighton Road (2.03 ha)	Residential	Residential; Class E; Health
STC51	Eothen 31 Worcester Road, Sutton (0.22 ha)	Residential (Class C")	Residential
STC52	Norman House, 70 Cheam Road, Sutton	Residential Care Home (Class C2)	Retirement / Care Homes (Class C2)
W1	BTS House, 69 - 73 Manor Road, Wallington, (0.15 ha)	Employment (Class E)	Residential; Class E
W2	Melbourne Road Car Park, Wallington (0.23 ha)	Public Car Parking (SG)	Residential; Class E; Public Car Parking (Sui Generis)
W3	Wallington Telephone Exchange, Melbourne Road, Wallington (0.17 ha)	Telephone Exchange (SG)	Residential; Telephone Exchange (SG)
W4	Shell Garage, 102 Manor Road, Wallington (0.25 ha)	Petrol Station (Sui Generis)	Residential; Class E; Petrol Station (SG)
W5	Wallington Delivery Office, Grosvenor Road, Wallington (0.34 ha)	Postal Sorting Office (SG)	Residential; Class E; Postal Sorting Office (SG)
W6	Railway Approach, Wallington SM6 0DZ (1.10 ha)	Train Station ; Car Park (Class SG) Offices (Class E); Retail (Class E)	Car Park (Sui Generis); Offices (Class E) ; Retail (Class E) ; Residential
W7	Lidl Site, Beddington Gardens, Wallington (0.30 ha)	Retail (Class E)	Retail (Class E); Residential
W8	Manor Road / Ross Parade (The Whispering Moon Pub) SM6 8QF (0.150 ha)	Pub (Class SG), ; Retail (Class E) Residential (Class C3)	Pub (Sui Generis); Retail (Class E); Residential
W9	Travis Perkins, 21 Ross Parade Wallington SM6 8QF (0.150 ha)	Builders Merchant (Class SG)	Class E; Residential
W10	Sainsbury's, 2 Stafford Rd, Wallington, SM6 9AA (0.80 ha)	Supermarket (Class E)	Residential; Class E
W11	Shotfield Car Park, Shotfield Road, Wallington SM6 0EU (0.40 ha)	Public Car Park (Sui Generis)	Residential; Public Car Parking (SG)
W12	Former Wallington Hall Car Park, Wallington, SM6 0PR (0.26 ha)	Car Parking (Sui Generis)	Residential
W13	Crosspoint House, 28 Stafford Road, Wallington, (ha)	Employment (Class E)	Residential; Class E

	Site Name	Existing Land Use	Potential Future Use
W14	Land Rear of 105 Stafford Road, Wallington (0.130 ha)	Warehouse (Class B8) Retail (Class E)	Residential; Class E; Warehouse (B8)
W15	Land at St Elpheges Church, Stafford Road, Wallington (0.18 ha)	Car Parking (SG)	Residential; Class E
W16	Cloverdale Court, 10 Stanley Park Road, Wallington (ha)	Residential Care Home (Class C2)	Residential
W17	Land Rear of 16-18 Stanley Park Road / Holmwood Gardens (0.090 ha)	Warehouse (Class B8)	Residential
W18	Crusader Hall, Stanley Park Road, Wallington SM6 0ET (0.10 ha)	Community (Class F2)	Residential; Community (Class F2)
W19	Gower House, 75 Woodcote Road, Wallington (0.13 ha)	Residential (Class C3)	Residential
H1	Felnex Trading Estate, London Road, Hackbridge (7.70 ha)	Mixed Use - Residential (Class C3) / Employment (Class E)	Residential; Class E; Class B
H2	Land adj Hackbridge Station, London Road, Hackbridge (1.2 ha)	Employment (Class B2 / B8 / SG)	Residential; Class E ; Class B
H3	Hackbridge Station, London Road, Hackbridge (0.300 ha)	Train Station; Car Park (Class SG)	Residential; Class E ; Car Parking (Sui Generis)
H4	Vulcan House, Restmor Way, Hackbridge, (0.08 ha)	Employment (Class E)	Residential
H5	Land East of Sandmartin Way (BedZED) (0.50 ha)	Green Space (Class F2)	Community ; Open space
H6	Hackbridge Primary School, Land north of BedZED, Hackbridge (1.59 ha)	Primary School; Open Space	Primary School; Open Space
OTHER DISTRICT CENTRES (DC) and APIs			
DC1	The Grove House, Grove Park, High Street, Carshalton (0.08 ha)	Employment (Class E)	Residential
DC2	Charles Cryer Theatre, High Street, Carshalton (0.07 ha)	Community (Class F2) Restaurant (Class E)	Community (Class F2); Restaurant (Class E)
DC3	Former Fox & Hounds Public House, 41 High Street, Carshalton (0.14 ha)	Public House (Sui Generis)	Residential; Public House (SG); Class E
DC4	Greenview House, 5 Manor Road Wallington SM6 0BW (0.1 ha)	Vacant Offices (Class E)	Class E; Education (Class F); Residential
DC5	Former HSS Hire, HaredonHaredon Malden Road Cheam (0.14 ha)	Former Employment (Class E)	Residential
DC6	Tesco Esso Express (with petrol station), 50 Malden Road, Cheam (0.15 ha)	Supermarket (Class E)	Residential; Class E
DC7	Cheam Library, Church Road, Cheam (0.30 ha)	Library (Class F1); Public Car Parking (Sui Generis)	Library (Class F1); Health (Class E); Other (Sui Generis); Residential ; Public Car Parking (SG)
DC8	Anne Boleyn House 9 - 13 Ewell Road Cheam (0.10 ha)	Former Employment (Class E)	Residential
DC9	Oceantech House, Station Approach, Cheam (0.60 ha)	Employment (Class E)	Residential
DC10	Peaches Court Sports Club, Peaches Close, Cheam (0.18 ha)	Car Parking (SG)	Residential; Community (Class F2); Car Parking (Sui Generis);
DC11	Former HG Wells Public House, 101 Cheam Common Rd, Worcester Park (0.20 ha)	Public House (Sui Generis)	Residential; Public House (SG)
DC12	Resource Centre, Covey Road / London Road (0.37 ha)	Community (Class F2) and Offices (Class E)	Residential; Community (Class F2); Class E (Offices)
DC13	Tesco Esso Express (with petrol station), 668 London Road, Sutton (0.15 ha)	Petrol Station (Sui Generis); Supermarket (Class E)	Residential; Class E; Petrol Station (SG)
DC14	Sainsbury's, 566 London Road, Sutton (2.90 ha)	Supermarket (Class E); Cafe (Class E)	Residential; Class E
DC15	Former Victoria House, 388 (Malden Road, Cheam, (0.28 ha)	Vacant - Previously Employment (Class E)	Residential; Class E; Class F
DC16	Cheam Leisure Centre, Malden Road / Priory Crescent (1.280 ha)	Community (Class F2) and Health (Class E)	Community (Class F2); Health (Class E)
DC17	Hill House, Bishopsford Road, Rosehill (1.05 ha)	Community (Class F2)	Community (Class F2); Residential
DC18	St Helier Ambulance Station, Bishopsford Road, Carshalton, Morden (0.30 ha)	Ambulance Station (Sui Generis)	Residential; Ambulance Station (Sui Generis)
DC19	Lidl Rosehill, Wrythe Lane, Rosehill (0.43 ha)	Retail (Class E)	Retail (Class E) ; Residential

	Site Name	Existing Land Use	Potential Future Use
DC20	02-104 Rose Hill, Sutton (0.98 ha)	Residential (Class C3)	Residential
DC21	St Helier Hospital, Wrythe Lane, Sutton, Carshalton(4.00 ha)	Hospital (Class C2); Public Car Parking (Sui Generis)	Residential; Hospital (Class C2); Health (Class E); Public Car Parking (SG)
DC22	Worcester Park Telephone Exchange and Royal Mail, Longfellow Road (0.36 ha)	Telephone Exchange and Sorting Office (Sui Generis)	Residential; Class E; Telephone Exchange and Sorting Office (SG)
DC23	165-181 Central Road, Worcester Park (0.44 ha)	Retail (Class E); Offices (Class E); Public Hse (Class SG) ; Residential (Class C3); Open Space.	Class E; Public House (Sui Generis); Residential; Open Space.
DC24	Land at 1 Lynwood Drive, Worcester Park (0.13 ha)	Community (Class F2) Car Parking (SG)	Residential (Use Class C3); Community (Class F2); Class E (Health)
DC25	Stoneplace Car Park, 133B Central Road, Worcester Park (0.27 ha)	Car Parking (SG)	Residential; Class E; Car Parking (Sui Generis)
DC26	1-9 Windsor Road & 81-85 Central Road, Worcester Park (0.10 ha)	Mixed use - Residential (Class C3) / Restaurant (Class E / Offices (Class E)	Residential; Class E
DC27	Griffiths Close, 209 Cheam Common Road, Worcester Park ha)	Residential Care Home (Class C2)	Retirement / Care Homes (Class C2)
DC28	Land North of Braemar Road, Worcester Park, Sutton (0.59 ha)	Green Space / Housing Amenity Land / Community (Class F2)	Residential; Community (Class F2)
SUBURBAN HEARTLANDS (SB)			
SB1	Haredon House, 810 London Road, North Cheam, Sutton (0.20 ha)	Residential (Class C3) / Employment (Class E) / Retail (Class E)	Residential
SB2	Wilson's Van Centre, 730-736 London Road, Sutton (0.28 ha)	Employment (Class E)	Residential; Class E
SB3	Stonecot Car Wash, Sutton Common Road, Sutton SM3 9HA; 0.13	Car Wash (Class Sui Generis)	Residential; Class E
SB4	Former Mortuary, Sutton Cemetery, Alcorn Close, Sutton (1.10 ha)	Mixed Use - Disused mortuary site (SG) / Groundsman mess and drying rooms (used) (Sui Generis) / Storage buildings (used) (Class B8) / Land reserved for burial space use (unused) (Sui Generis).	Residential; Class E
SB5	Tesco Extra (with petrol station and car park), 55 Oldfields Road, Sutton (3.70 ha)	Supermarket (Class E); Petrol Station (SG); Car Park	Class E; Petrol Station; Employment (Class B2/B8); Residential
SB6	9 St Dunstons Hill, Cheam (0.13 ha)	Employment (Class E)	Residential; Class E
SB7	Sutton United Football Club, Gander Green Lane, Sutton (2.4 ha)	Sports Ground Community Facilities (Class F2)	Sports Ground Community Facilities (Class F2)
SB8	Rosehill Recreation Ground, Rose Hill, Sutton (5.82 ha)	Former all-weather sports pitch, astroturf tennis courts, and single storey building (Class F2)	Education (Class F1)
SB9	Tesco Express, 77 Angel Hill, Sutton (0.22 ha)	Supermarket (Class E)	Residential; Class E
SB10	All Saints Hall, Benhill Wood Road (0.5 ha)	Community (Class F2) ; Car Parking (SG)	Residential; Community (Class F2)
SB11	Land to the Rear of Middleton Circle, Assembly Walk, The Wrythe (0.12 ha)	Place of Worship (Class F1)	Residential; Place of Worship (Class F1)
SB12	Waltham Road Depot, Waltham Road, the Wrythe (0.12 ha)	Former Depot and Garages (Class SG)	Residential
SB13	2-4 Prince Of Wales Road, Sutton (0.12 ha)	Residential (Class C3)	Residential
SB14	Access Self Storage Sutton, 107 Westmead Road, Sutton (0.50 ha)	Employment (Class B8)	Residential; Class B8
SB15	Former Chelsea Timber Merchants Ltd, 71-74 Westmead Road, Sutton (0.25 ha)	Employment (Class E)	Residential
SB16	Allen House, Westmead Road, Carshalton (0.04 ha)	Offices (Class E)	Residential
SB17	Ambulance Station, Harrow Road Carshalton (0.09 ha)	Ambulance Station (Class SG)	Community (Class F2); Residential
SB18	Carshalton Institute and Social Club, North Street, Carshalton (0.09 ha)	Community (Class F2) ; Car Parking (SG)	Community (Class F2); Car Parking (Sui Generis); Residential (Class C3)

	Site Name	Existing Land Use	Potential Future Use
SB19	Council Offices, Denmark; Road, Carshalton (0.40 ha)	Former Employment (Class E)	Residential
SB20	Council Car Park, Denmark Road, Carshalton (0.40 ha)	Former Car Park (Sui Generis)	Residential
SB21	Land at Jessops Way, Croydon (OPTION 1) (12.0 ha)	Mixed Use - Go-karting track (Class F2) / Employment (B2 / B8) / MOL	Industrial - Class B2/B8; Class E (ii) and (iii); Residential*;
SB22	Land at Jessops Way, Croydon (OPTION 2) (4.13 ha)	Mixed Use - Go-karting track (Class F2) / Employment (B2 / B8) / MOL	Industrial - Class B2/B8; Class E (ii) and (iii)*
SB23	Land West of Beddington Lane, Sutton (0.11 ha)	MOL (MOL02); MGC (MGC03)	Industrial - Class B2/B8; Class E (ii) and (iii)*.
SB24	777 Recycling Centre, 11 Coomber Way, Croydon (1.00 ha)	Former Waste / Recycling (designated)	Industrial - Class B2/B8; Class E (ii) and (iii)
SB25	156-160 Beddington Lane, Beddington (1.81 ha)	Former Waste / Recycling (de-designated)	Industrial - Class B2/B8; Class E (ii) and (iii)
SB26	Former European Metal Recycling, Therapia Lane, Beddington; 0.95	Former Waste / Recycling (de-designated)	Industrial - Class B2/B8; Class E (ii) and (iii)
SB27	Beddington Sub-Area 3: Asda Marlowe Way, Beddington, Sutton (3.60 ha)	Supermarket (Class E)	Industrial - Class B2/B8; Class E (ii) and (iii); Supermarket (Class E)
SB28	Beddington Sub-Area 3: Beddington South - 112 Beddington Lane (0.74 ha)	Employment (Class B2 / Class B8)	Industrial - Class B2/B8
SB29	Former PB Builders, 30 - 32 Beddington Lane, Beddington, Sutton (0.14 ha)	Vacant - Previously Employment (Class E)	Residential
SB30	Land to rear of 81 Claydon Drive, Beddington (0.25 ha)	None - Greenfield	Residential
SB31	Sheen Way Playing Fields, Sheen Way, Beddington (2.5 ha)	Former Playing Fields / School (Class F1)	School (Class F1) / Open Space; Public Open Space
SB32	Land at Hannibal Way Beddington / Roundshaw; (0.31 ha)	Community (Class F2)	Community (Class F2); Industry (Class B); Gypsy and Traveller Site
SB33	Land to East of 41-52 Alexandra Gardens, Carshalton (0.24 ha)	Residential (Class C3) - Garages	Residential
SB34	1-3 Metcalfe Avenue, Carshalton (1.0 ha)	Driving Lessons and mobility advice (SG)	Residential; Class E; Employment (Class B); Health.
SB35	Former Carshalton Beeches Bowling Club and Land, 61 Banstead Road South (0.54 ha)	Outdoor Sports Ground (Class F2)	Residential
SB36	Land East of Woodmansterne Lane, Wallington, (3.40 ha)	Garden Centre / Nursery (Class E)	Residential
SB37	Woodcote Grove House, Orford House, Field Cottages 1-3 and Cottages 1-2, Woodcote Grove (16.00 ha)	Residential Care Home (Class C2) and Staff Accommodation (Class C3)	Retirement / Care Homes (Class C2); Residential (Class C3).
SB38	Land to the East of Grove Place, Carshalton	Green Belt	Gypsy and Traveller Site
SB39	The Mount, Clockhouse Estate, Clockhouse, Coulsdon (1) (0.17 ha)	Residential (Class C3) / Community Centre (Class F) / Nursery (Class D)	Residential; Community (Class F)
SB40	Longlands Avenue / Hillcrest Parade, Clockhouse Estate, Coulsdon (2) (0.37 ha)	Residential (Class C3) / Employment / Shops (Class E)	Residential; Community (Class F); Class E
SB41	Downlands Close, Clockhouse Estate, Clockhouse, Coulsdon (4) (0.40)	Residential (Class C3)	Residential
SB42	Longlands Avenue / Pembury Close, Clockhouse Estate, Clockhouse, Coulsdon (5); (0.51 ha)	Residential (Class C3)	Residential
SB43	Trickett House, 125 Brighton Road, Sutton	Residential (Class C3)	Residential
SB44	Sutton Ambulance Station, 18 Dorset Rd, Sutton, (0.12 ha)	Ambulance Station (Sui Generis)	Residential; Ambulance Station (SG)
SB45	Grantley Court Nursing Home, 22 York Road, Cheam (0.20 ha)	Residential (Class C3)	Residential
SB46	Health Education Books, Willow House, Willow Walk, Sutton (0.10 ha)	Employment (Class E)	Class B; Class E;
SB47	Linney Fencing Limited, Nursery Gardens, Goat Road, Carshalton Road, Sutton (0.46 ha)	Employment (Class E)	Employment (Class B2/B8/E)
SB48	Land to the south of the Pastures, Carshalton Road, Woodcote (0.58 ha)	Gypsy and Traveller Site	Gypsy and Traveller Site

	Site Name	Existing Land Use	Potential Future Use
SB49	Sainsbury's/Argos Distribution Centre, Marlowe Way, Beddington (1.98 ha)	Employment (Class B2/B8/E)	Employment (Class B2/B8/E)
SB50	Land to south of Marlowe Way, Beddington (1.1 ha)	Employment (Class B2/B8/E)	Employment (Class B2/B8/E)
SB51	Garages at Radcliffe Gardens, Carshalton Beeches (0.11 ha)	Residential garages	Residential
SB52	Wandle Valley Trading Estate (0.54 ha)	Employment (Class B2/B8/E)	Employment (Class B2/B8/E)

* = 'Call for Sites' submissions. Inclusion here does not necessarily mean the Council agrees with the suggested use. It is included for the purposes of consultation.

10. APPRAISAL OF DRAFT POLICY OPTIONS AND ALTERNATIVES

INTRODUCTION

10.1 This chapter sets out the results of appraisal 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.

10.2 The appraisal methodology and scoring system used is closely based on the recommended approach set out in Government guidance and takes forward the approach outlines in the SA Scoping Report.

10.3 The likely social, economic and environmental impacts of each strategic option and draft policy on each of the sustainability objectives within the Council's SA Framework have been evaluated in terms of:

- associated with the the nature of the predicted impact (beneficial, adverse or neutral);
- the scale/ significance of the predicted impact (small, medium, large); and
- potential indirect, cumulative or synergistic impacts
- the likely duration of the impact (short-term, medium-term or long term); and
- the level of uncertainty predicted impact.

10.4 Table 10.1 provides a guide to the symbols used in the Appraisal Matrix (Table 10.2) which are used to indicate the nature and scale of the predicted effects:

Table 10.1: Guide to Appraisal Symbols

Short, Medium and Long-Term effects	
+++	large beneficial/ Borough-wide
++	medium beneficial effects
+	small beneficial effect
X	Adverse impact
?	Uncertain impact
	None/ neutral effect

Table 10.2: Sustainability Appraisal of strategic options and draft policies sety out in the Local Plan Issues and Preferred Options (Regulation 18) document (July 2024)

	SA FRAMEWORK OBJECTIVES											
	(A) Environmental Sustainability				(B) Sustainable Economic Growth				(C) Sustainable Communities			
+ Small beneficial impact ++ Medium beneficial impact +++Large beneficial impact X Adverse Impact ? Uncertain impact None/ neutral	(1) CLIMATE MITIGATION AND NET ZERO To address causes of climate change by minimising CO ₂ emissions and promoting zero carbon in new development	(2) FLOOD RISK AND WATER RESOURCES To avoid, reduce and manage all sources of flood risk to and from development taking account of climate change	(3) OPEN SPACE, GREENING & BNG To enhance provision and quality of Sutton's open environment, promote greening & biodiversity linkages and promote BNG	(4) SUSTAINABLE TRANSPORT, HEALTHY STREETS AND AIR QUALITY To reduce traffic, reduce congestion, local air pollution, promote sustainable transport and healthy streets	(5) TOWN CENTRES To enhance the vitality and viability and regeneration of Sutton Town Centre and town centres throughout Borough and promote access to community shopping facilities.	(6) SUSTAINABLE ECONOMIC GROWTH, LOCAL EMPLOYMENT EDUCATION & SKILLS To promote a strong, sustainable and high-skilled local economy	(7) URBAN REGENERATION & AREA RENEWAL To create world's leading life science district on the LCH site; promote Sutton Link and secure inward investment for area renewal	(8)GREEN ECONOMY DECENT ENERGY; & DECARBONISATION. To attract green business; promote 'circular' economy; promote decentralised energy & decarbonise social housing & buildings	(9) ACCESS TO HOUSING To meet the future local need for housing and affordable housing and the Borough's share of London's need	(10) SOCIAL AND COMMUNITY INFRASTRUCTURE To maintain and enhance good access to health, education, sports, leisure and other public amenities for Borough residents	(11) BUILT AND HISTORIC ENVIRONMENT To protect and enhance the quality of built design, townscape quality, local character and the Borough's historic environment	(12) EQUALITIES, & CLIMATE JUSTICE Avoid discrimination against equalities groups; promote climate justice, address deprivation; promote healthy & safe communities,
STRATEGIC POLICIES: BOROUGH-WIDE												
ISSUE 1: ESTABLISHING SUTTON'S GROWTH NEEDS - updates Policy 1 of Local Plan 2018												
1.1 Housing (net homes per year)												
OPTION A: Low growth: Minimum of 469 units to 2029 and minimum of 403 units from 2029 - 2041 (current London Plan housing target for Sutton)												
OPTION B: Medium growth 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: High growth Minimum of 886 units (Sutton's capped housing need figure)												
OPTION A: Low growth		+	+	+	+	+	+		+	+	+	+
OPTION B: Medium growth		+	+	++	++	+	+		++	++	+	+
OPTION C: High growth		X	X	X	X	X	X		+++	X	X	X
<p>Option A: Low growth (minimum of 469 units to 2029 and minimum of 403 units from 2029 - 2041) will have:</p> <p><u>Small beneficial effects (+) on</u></p> <ul style="list-style-type: none"> avoiding, reducing and managing all sources of flood risk taking account of climate change (Appraisal Objective 2) ; protecting and enhancing the quality of Sutton's open environment, promoting urban greening (blue and green infrastructure), promoting ecological pathways and securing biodiversity net gain throughout the Borough (Appraisal Objective 3) reducing traffic levels, reducing congestion, cutting local air pollution, promoting active and sustainable modes of transport and promoting healthy streets (Appraisal Objective 4) enhancing the vitality and viability and regeneration of Sutton Town Centre and town centres and promoting access to community shopping facilities (Appraisal Objective 5); promoting economic growth and a strong, sustainable and high-skilled local economy (Appraisal Objective 6); promoting area renewal, implementing environmental improvements, supporting the life sciences and attracting investment in infrastructure and high-skilled jobs (Appraisal Objective 7) helping to meet the future local need for housing and the Borough's share of London's need (Appraisal Objective 9); maintaining and enhancing good access to health, education, sports, leisure and other public amenities for Borough residents (Appraisal Objective 10) protecting and enhancing the quality of built design, townscape quality, local character and the Borough's historic environment (Appraisal Objective 11) ensuring that the Local Plan does not discriminate against equalities target groups and promotes climate justice (Appraisal Objective 12) 									<p>While Option C (high housing growth) would deliver the most housing over the plan period (a minimum of 886 units) and therefore go further towards meeting Sutton's capped housing needs figure and providing family homes (scoring +++), 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'), Option 3 has a number of potentially negative impacts in terms of the strategic release of Green Belt/ MOL and other greenfield sites; employment land; the suburban character of the Borough; sustainable transport objectives (greater reliance on the private car due to developing in locations with poor public transport accessibility; the ability to accommodate infrastructure requirements and quality of life.</p>			
<p>Option B: Medium growth (minimum of 650 units) will have</p> <p><u>Medium beneficial effects (++) on:</u></p> <ul style="list-style-type: none"> reducing traffic levels, reducing congestion, cutting local air pollution, promoting active and sustainable modes of transport and promoting healthy streets (Appraisal Objective 4); enhancing the vitality and viability and regeneration of Sutton Town Centre and district centres (Appraisal Objective 5); helping to meet the future local need for housing and the Borough's share of London's need (Appraisal Objective 9); maintaining and enhancing good access to health, education, sports, leisure and other public amenities for Borough residents (Appraisal Objective 10); <p><u>Small beneficial effects (+) on</u></p> <ul style="list-style-type: none"> avoiding, reducing and managing all sources of flood risk taking account of climate change (Appraisal Objective 2) ; protecting and enhancing the quality of Sutton's open environment, promoting urban greening (blue and green infrastructure), promoting ecological pathways and securing biodiversity net gain throughout the Borough (Appraisal Objective 3) promoting economic growth and a strong, sustainable and high-skilled local economy (Appraisal Objective 6); promoting area renewal, implementing environmental improvements, supporting the life sciences and attracting investment in infrastructure and high-skilled jobs (Appraisal Objective 7) protecting and enhancing the quality of built design, townscape quality, local character and the Borough's historic environment (Appraisal Objective 11) ensuring that the Local Plan does not discriminate against equalities target groups and promotes climate justice (Appraisal Objective 12) 									<p>In contrast, Option A(low housing growth) 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 meetinmg identified housing needs (scoring +), require further taller buildings and limit access to open space for local residents within Sutton Town Centre, there are a number of positive sustainability impacts in terms of protecting Green Belt/ MOL and other greenfield sites and employment land from development; 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 the suburban character of the Borough accommodate infrastructure requirements and quality of life.</p>			
<p>Option C (minimum of 650 units) will have</p> <p><u>Large beneficial effects (++) on:</u></p> <ul style="list-style-type: none"> helping to meet the future local need for housing and the Borough's share of London's need (Appraisal Objective 9) by <p><u>Potentially negative (uncertain) effects (+) on</u></p> <ul style="list-style-type: none"> avoiding, reducing and managing all sources of flood risk taking account of climate change (Appraisal Objective 2) ; protecting and enhancing the quality of Sutton's open environment, promoting urban greening (blue and green infrastructure), promoting ecological pathways and securing biodiversity net gain throughout the Borough (Appraisal Objective 3) reducing traffic levels, reducing congestion, cutting local air pollution, promoting active and sustainable modes of transport and promoting healthy streets (Appraisal Objective 4) enhancing the vitality and viability and regeneration of Sutton Town Centre and town centres and promoting access to community shopping facilities (Appraisal Objective 5); promoting economic growth and a strong, sustainable and high-skilled local economy (Appraisal Objective 6); promoting area renewal, implementing environmental improvements, supporting the life sciences and attracting investment in infrastructure and high-skilled jobs (Appraisal Objective 7) helping to meet the future local need for housing and the Borough's share of London's need (Appraisal Objective 9); maintaining and enhancing good access to health, education, sports, leisure and other public amenities for Borough residents (Appraisal Objective 10) protecting and enhancing the quality of built design, townscape quality, local character and the Borough's historic environment (Appraisal Objective 11) ensuring that the Local Plan does not discriminate against equalities target groups and promotes climate justice (Appraisal Objective 12) 									<p>Option B (medium housing growth) 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 over the plan period than the high growth option (scoring ++), as with Option 1, there are there are number of positive sustainability impacts in terms of protecting Green Belt/ MOL and other greenfield sites and employment land from housing development; urban greening and biodiversity; ensuring that most new development is accommodated in the most sustainable locations with the best public transport accessibility and access to services; maintaining the the suburban character of the Borough; accommodating infrastructure requirements and quality of life.</p>			

SA FRAMEWORK OBJECTIVES												
(A) Environmental Sustainability				(B) Sustainable Economic Growth				(C) Sustainable Communities				
	(1) CLIMATE MITIGATION AND NET ZERO To address causes of climate change by minimising CO ₂ emissions and promoting zero carbon in new development	(2) FLOOD RISK AND WATER RESOURCES To avoid, reduce and manage all sources of flood risk to and from development taking account of climate change	(3) OPEN SPACE, GREENING & BNG To enhance provision and quality of Sutton's open environment, promote greening & biodiversity linkages and promote BNG	(4) SUSTAINABLE TRANSPORT, HEALTHY STREETS AND AIR QUALITY To reduce traffic, reduce congestion, local air pollution, promote sustainable transport and healthy streets	(5) TOWN CENTRES To enhance the vitality and viability and regeneration of Sutton Town Centre and town centres throughout Borough and promote access to community shopping facilities.	(6) SUSTAINABLE ECONOMIC GROWTH, LOCAL EMPLOYMENT EDUCATION & SKILLS To promote a strong, sustainable and high-skilled local economy	(7) URBAN REGENERATION & AREA RENEWAL To create world's leading life science district on the LCH site; promote Sutton Link and secure inward investment for area renewal	(8) GREEN ECONOMY DECENT ENERGY; & DECARBONISATION. To attract green business; promote 'circular' economy; promote decentralised energy & decarbonise social housing & buildings	(9) ACCESS TO HOUSING To meet the future local need for housing and affordable housing and the Borough's share of London's need	(10) SOCIAL AND COMMUNITY INFRASTRUCTURE To maintain and enhance good access to health, education, sports, leisure and other public amenities for Borough residents	(11) BUILT AND HISTORIC ENVIRONMENT To protect and enhance the quality of built design, townscape quality, local character and the Borough's historic environment	(12) EQUALITIES, & CLIMATE JUSTICE Avoid discrimination against equalities groups; promote climate justice, address deprivation; promote healthy & safe communities,
+ Small beneficial impact ++ Medium beneficial impact +++ Large beneficial impact X Adverse Impact ? Uncertain impact None/ neutral												
1.2 Industry Floorspace* (Delivered with a building footprint to plot ratio of 65%)												
OPTION A: Low growth 100,000 sq.m. (based on past trends projection)			+	+		X	X	X	+	+	+	X
OPTION B: Medium growth 166,760 sq.m. (based on meeting need in full)			X?	X?		++	++	++	+	X?	+	+
OPTION C: High growth 166,760 sq.m. + (based on exceeding need)			X	X		+	+	++	X	X	X	X
Option A: Low growth: 100,000 sq.m. (based on past trends projection) is predicted to have:									ANALYSIS			
<p><u>Small beneficial effects (+) on</u></p> <ul style="list-style-type: none"> protecting and enhancing the quality of Sutton's open environment, promoting urban greening (blue and green infrastructure), promoting ecological pathways and securing biodiversity net gain throughout the Borough (Appraisal Objective 3) reducing traffic levels, reducing congestion, cutting local air pollution, promoting active and sustainable modes of transport and promoting healthy streets (Appraisal Objective 4) promoting economic growth and a strong, sustainable and high-skilled local economy (Appraisal Objective 6); helping to meet the future local need for housing and the Borough's share of London's need (Appraisal Objective 9); maintaining and enhancing good access to health, education, sports, leisure and other public amenities for Borough residents (Appraisal Objective 10) protecting and enhancing the quality of built design, townscape quality, local character and the Borough's historic environment (Appraisal Objective 11) ensuring that the Local Plan does not discriminate against equalities target groups and promotes climate justice (Appraisal Objective 12) <p><u>Potentially negative (uncertain) effects (+) on</u></p> <ul style="list-style-type: none"> promoting economic growth and a strong, sustainable and high-skilled local economy (Appraisal Objective 6); promoting area renewal, implementing environmental improvements, supporting the life sciences and attracting investment in infrastructure and high-skilled jobs (Appraisal Objective 7) 									<p>While Option A (low growth in industry floorspace) would have some potential benefits in terms of avoiding the strategic release of Green Belt/ MOL, greenfield sites or potential housing sites for industrial uses; sustainable transport objectives and maintaining the suburban character of the Borough, 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 (using the London Plan plot ratio of 65%) as identified in the Employment Land and Economic Needs Assessment (ELENA) 2023. Negative impacts are therefore identified for this low growth option (scoring 'x') in terms of promoting sustainable economic growth, building a strong and high-skilled local economy, securing inward investment and attracting green business.</p>			
Option B: Medium growth: 166,760 sq.m. (based on meeting need in full) is predicted to have:									In contrast, Option B (medium growth in industry floorspace) would help to meet the high demand for new industrial floorspace 167,000 sq.m. (or 8,338 sq.m. per annum or 26 hectares (using the London Plan plot ratio of 65%) as identified in the ELENA 2023 and therefore have potentially beneficial impacts on promoting sustainable economic growth, building a strong and high-skilled local economy, securing inward investment and attracting green business (scoring ++). 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.			
<p><u>Medium beneficial effects (++) on:</u></p> <ul style="list-style-type: none"> promoting economic growth and a strong, sustainable and high-skilled local economy (Appraisal Objective 6); promoting area renewal, implementing environmental improvements, supporting the life sciences and attracting investment in infrastructure and high-skilled jobs (Appraisal Objective 7) <p><u>Small beneficial effects (+) on</u></p> <ul style="list-style-type: none"> protecting and enhancing the quality of Sutton's open environment, promoting urban greening (blue and green infrastructure), promoting ecological pathways and securing biodiversity net gain throughout the Borough (Appraisal Objective 3) reducing traffic levels, reducing congestion, cutting local air pollution, promoting active and sustainable modes of transport and promoting healthy streets (Appraisal Objective 4) promoting economic growth and a strong, sustainable and high-skilled local economy (Appraisal Objective 6); helping to meet the future local need for housing and the Borough's share of London's need (Appraisal Objective 9); maintaining and enhancing good access to health, education, sports, leisure and other public amenities for Borough residents (Appraisal Objective 10) protecting and enhancing the quality of built design, townscape quality, local character and the Borough's historic environment (Appraisal Objective 11) ensuring that the Local Plan does not discriminate against equalities target groups and promotes climate justice (Appraisal Objective 12) 									Option C (high growth in industry floorspace) would seek to exceed the identified high demand for new industrial floorspace 167,000 sq.m. (or 8,338 sq.m. per annum or 26 hectares (using the London Plan plot ratio of 65%) 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). However there would be a number of negative impacts in terms of necessitating the further release of MOL or other greenfield sites for industrial use; urban greening and biodiversity objectives; increasing traffic levels and congestion on the Borough's road network; increasing air pollution; taking up land needed for housing and/or essential community infrastructure and townscape quality/ local character/ quality of life.			
Option C High growth 166,760 sq.m. + (based on exceeding need) is predicted to have:												
<p><u>Small beneficial effects (+) on:</u></p> <ul style="list-style-type: none"> promoting economic growth and a strong, sustainable and high-skilled local economy (Appraisal Objective 6); promoting area renewal, implementing environmental improvements, supporting the life sciences and attracting investment in infrastructure and high-skilled jobs (Appraisal Objective 7) <p><u>Potentially negative (uncertain) effects (+) on</u></p> <ul style="list-style-type: none"> protecting and enhancing the quality of Sutton's open environment, promoting urban greening (blue and green infrastructure), promoting ecological pathways and securing biodiversity net gain throughout the Borough (Appraisal Objective 3) reducing traffic levels, reducing congestion, cutting local air pollution, promoting active and sustainable modes of transport and promoting healthy streets (Appraisal Objective 4) promoting economic growth and a strong, sustainable and high-skilled local economy (Appraisal Objective 6); helping to meet the future local need for housing and the Borough's share of London's need (Appraisal Objective 9); maintaining and enhancing good access to health, education, sports, leisure and other public amenities for Borough residents (Appraisal Objective 10) protecting and enhancing the quality of built design, townscape quality, local character and the Borough's historic environment (Appraisal Objective 11) ensuring that the Local Plan does not discriminate against equalities target groups and promotes climate justice (Appraisal Objective 12) 												

SA FRAMEWORK OBJECTIVES												
(A) Environmental Sustainability				(B) Sustainable Economic Growth				(C) Sustainable Communities				
	(1) CLIMATE MITIGATION AND NET ZERO To address causes of climate change by minimising CO ₂ emissions and promoting zero carbon in new development	(2) FLOOD RISK AND WATER RESOURCES To avoid, reduce and manage all sources of flood risk to and from development taking account of climate change	(3) OPEN SPACE, GREENING & BNG To enhance provision and quality of Sutton's open environment, promote greening & biodiversity linkages and promote BNG	(4) SUSTAINABLE TRANSPORT, HEALTHY STREETS AND AIR QUALITY To reduce traffic, reduce congestion, local air pollution, promote sustainable transport and healthy streets	(5) TOWN CENTRES To enhance the vitality and viability and regeneration of Sutton Town Centre and town centres throughout Borough and promote access to community shopping facilities.	(6) SUSTAINABLE ECONOMIC GROWTH, LOCAL EMPLOYMENT EDUCATION & SKILLS To promote a strong, sustainable and high-skilled local economy	(7) URBAN REGENERATION & AREA RENEWAL To create world's leading life science district on the LCH site; promote Sutton Link and secure inward investment for area renewal	(8) GREEN ECONOMY DECENT ENERGY; & DECARBONISATION. To attract green business; promote 'circular' economy; promote decentralised energy & decarbonise social housing & buildings	(9) ACCESS TO HOUSING To meet the future local need for housing and affordable housing and the Borough's share of London's need	(10) SOCIAL AND COMMUNITY INFRASTRUCTURE To maintain and enhance good access to health, education, sports, leisure and other public amenities for Borough residents	(11) BUILT AND HISTORIC ENVIRONMENT To protect and enhance the quality of built design, townscape quality, local character and the Borough's historic environment	(12) EQUALITIES, & CLIMATE JUSTICE Avoid discrimination against equalities groups; promote climate justice, address deprivation; promote healthy & safe communities,
+ Small beneficial impact ++ Medium beneficial impact +++ Large beneficial impact X Adverse Impact ? Uncertain impact None/ neutral												
1.3 Office Floorspace (sq.m. per year)												
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.)					++	++?			x?	x?		
OPTION C: High growth (81,583 sq.m. floorspace to job ratio of 12 sq.m.)					++?	++?			x	x		
Option A: Low growth (Minimum 15,000 sq.m. for first 5 to 10 years of plan period)									ANALYSIS			
Small beneficial effects (+) on									As noted in the Local Plan Issues and Preferred Options document, there is some uncertainty affecting this area of policy. The Employment Land and Economic Needs Assessment (ELENA) 2023 concluded that the demand for office space in Sutton is weak and that growth in office jobs was not resulting in an increase in demand for additional floorspace. At the same time, there has been strong jobs growth over the plan period, which would be expected to translate into a high office floorspace figure. Based on a floorspace to job ratio of 12 sq.m. the office need is calculated 81,583 sq.m. (or 4,079 sq.m. per annum). Based on a ratio of 7.4 sq.m. the office need is 56,620 sq.m. (or 2,831 sq.m. per annum). There is therefore a conflict between the weak office market and low market demand for office space versus the employment study identifying significant jobs growth. Both Options B (Medium Growth lower floorspace to jobs ratio) and C (High Growth higher floorspace to jobs ratio) are generally predicted to have positive impacts on promoting economic growth and a strong, sustainable and high-skilled local economy and enhancing the vitality and viability of Sutton Town Centre and other town centres. However the likely extent of the predicted benefits of each policy option will be significantly influenced by how much job growth can be accommodated within the Borough without necessarily requiring additional floorspace e.g. through optimising existing space and/or the growth of hybrid working alongside home-working. By providing for more offices floorspace than Option A, Options B and C in particular could have some potentially negative impacts in terms of housing delivery or accommodating social and community infrastructure within town centre locations.			
<ul style="list-style-type: none"> enhancing the vitality and viability of Sutton Town Centre and town centres throughout the Borough (Appraisal Objective 5) promoting economic growth and a strong, sustainable and high-skilled local economy (Appraisal Objective 6); 												
Option B: Medium growth (Minimum 56,620 sq.m.) floorspace to job ratio of 7.4 sq.m.)												
Medium beneficial effects (++) on:												
<ul style="list-style-type: none"> enhancing the vitality and viability of Sutton Town Centre and town centres throughout the Borough (Appraisal Objective 5) promoting economic growth and a strong, sustainable and high-skilled local economy (Appraisal Objective 6); 												
Potentially negative (uncertain) effects (x?) on												
<ul style="list-style-type: none"> helping to meet the future local need for housing and the Borough's share of London's need (Appraisal Objective 9); maintaining and enhancing good access to social and community infrastructure (Appraisal Objective 10) 												
Option C High growth (Minimum 81,583 sq.m office floorspace (floorspace to job ratio of 12 sq.m.)												
Medium beneficial effects (++) on:												
<ul style="list-style-type: none"> enhancing the vitality and viability of Sutton Town Centre and town centres throughout the Borough (Appraisal Objective 5) promoting economic growth and a strong, sustainable and high-skilled local economy (Appraisal Objective 6); 												
Potentially negative effects (x) on												
<ul style="list-style-type: none"> helping to meet the future local need for housing and the Borough's share of London's need (Appraisal Objective 9); maintaining and enhancing good access to social and community infrastructure (Appraisal Objective 10) 												
1.4 Retail Floorspace (sq.m of convenience retail)												
OPTION A 1,340 sq.m. (Convenience Retail)					+	+				+		
OPTION B 1,340 sq.m. (Convenience Retail)					+	+				+		
OPTION C 1,340 sq.m+ (Convenience Retail)					++?	++?				++?		
Options A and B: 1,340 sq.m. (Convenience Retail)									ANALYSIS			
Small beneficial effects (+) on									Within the context of the current challenging retail environment, recently exacerbated by the pandemic and the continued 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 & 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 over the plan period are considered to have beneficial impacts on town centre vitality and viability (scoring +) and sustainable economic growth (scoring +), whereas Option C may have greater benefits provided that higher quality and more efficient retail space is introduced to meet modern requirements			
<ul style="list-style-type: none"> enhancing the vitality and viability and regeneration of Sutton Town Centre and town centres and promoting access to community shopping facilities (Appraisal Objective 5); promoting economic growth and a strong, sustainable and high-skilled local economy (Appraisal Objective 6); maintaining and enhancing good access to health, education, sports, leisure and other public amenities for Borough residents (Appraisal Objective 10) 												
Option C: 1,340 sq.m. (Convenience Retail)												
Medium beneficial effects (++) on												
<ul style="list-style-type: none"> enhancing the vitality and viability and regeneration of Sutton Town Centre and town centres and promoting access to community shopping facilities (Appraisal Objective 5); promoting economic growth and a strong, sustainable and high-skilled local economy (Appraisal Objective 6); maintaining and enhancing good access to health, education, sports, leisure and other public amenities for Borough residents (Appraisal Objective 10) 												

SA FRAMEWORK OBJECTIVES												
(A) Environmental Sustainability				(B) Sustainable Economic Growth				(C) Sustainable Communities				
	(1) CLIMATE MITIGATION AND NET ZERO To address causes of climate change by minimising CO ₂ emissions and promoting zero carbon in new development	(2) FLOOD RISK AND WATER RESOURCES To avoid, reduce and manage all sources of flood risk to and from development taking account of climate change	(3) OPEN SPACE, GREENING & BNG To enhance provision and quality of Sutton's open environment, promote greening & biodiversity linkages and promote BNG	(4) SUSTAINABLE TRANSPORT, HEALTHY STREETS AND AIR QUALITY To reduce traffic, reduce congestion, local air pollution, promote sustainable transport and healthy streets	(5) TOWN CENTRES To enhance the vitality and viability and regeneration of Sutton Town Centre and town centres throughout Borough and promote access to community shopping facilities.	(6) SUSTAINABLE ECONOMIC GROWTH, LOCAL EMPLOYMENT EDUCATION & SKILLS To promote a strong, sustainable and high-skilled local economy	(7) URBAN REGENERATION & AREA RENEWAL To create world's leading life science district on the LCH site; promote Sutton Link and secure inward investment for area renewal	(8) GREEN ECONOMY DECENT ENERGY; & DECARBONISATION. To attract green business; promote 'circular' economy; promote decentralised energy & decarbonise social housing & buildings	(9) ACCESS TO HOUSING To meet the future local need for housing and affordable housing and the Borough's share of London's need	(10) SOCIAL AND COMMUNITY INFRASTRUCTURE To maintain and enhance good access to health, education, sports, leisure and other public amenities for Borough residents	(11) BUILT AND HISTORIC ENVIRONMENT To protect and enhance the quality of built design, townscape quality, local character and the Borough's historic environment	(12) EQUALITIES, & CLIMATE JUSTICE Avoid discrimination against equalities groups; promote climate justice, address deprivation; promote healthy & safe communities,
+ Small beneficial impact ++ Medium beneficial impact +++ Large beneficial impact X Adverse Impact ? Uncertain impact None/ neutral												
1.5 Food and beverage (sq. m.)												
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)					++	++						++
Option A: 12,472 sq.m. (based on meeting need in full) <u>Small beneficial effects (+) on:</u>									ANALYSIS			
<ul style="list-style-type: none"> enhancing the vitality and viability of Sutton Town Centre and town centres throughout the Borough (Appraisal Objective 5) promoting economic growth and a strong, sustainable and high-skilled local economy (Appraisal Objective 6); equalities - by facilitating access to convenience shopping (Appraisal Objective 12); 									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 (scoring ++), sustainable economic growth (++) and promoting access to convenience shopping			
Options B and C 12,472 sq.m. + (based on exceeding need) <u>Medium beneficial effects (++) on:</u>												
<ul style="list-style-type: none"> enhancing the vitality and viability of Sutton Town Centre and town centres throughout the Borough (Appraisal Objective 5) promoting economic growth and a strong, sustainable and high-skilled local economy (Appraisal Objective 6); equalities - by facilitating access to convenience shopping (Appraisal Objective 12); 												
1.6 Infrastructure												
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.				+++			+++?	+++		+++		+++
Options A and B: Metroisation and improved bus services; new healthcare facilities; and retain safeguarded primary school in Sutton Town Centre <u>Medium beneficial effects (++) on:</u>									ANALYSIS			
<ul style="list-style-type: none"> reducing traffic levels, reducing congestion, cutting local air pollution, promoting active and sustainable modes of transport and promoting healthy streets (Appraisal Objective 4) promoting area renewal, implementing environmental improvements, supporting the life sciences and attracting investment in infrastructure and high-skilled jobs (Appraisal Objective 7) attracting green business and jobs to the Borough; promote the 'circular' economy (Appraisal Objective 8) maintaining and enhancing good access to health, education, sports, leisure and other public amenities for Borough residents (Appraisal Objective 10) ensuring that the Local Plan does not discriminate against equalities target groups and promotes climate justice (Appraisal Objective 12) 									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 (scoring ++), sustainable economic growth (++) and promoting access to convenience shopping			
Option C Significant public transport improvements; New healthcare facilities; New primary & secondary schools <u>Large beneficial effects (++) on:</u>												
<ul style="list-style-type: none"> reducing traffic levels, reducing congestion, cutting local air pollution, promoting active and sustainable modes of transport and promoting healthy streets (Appraisal Objective 4) promoting area renewal, implementing environmental improvements, supporting the life sciences and attracting investment in infrastructure and high-skilled jobs (Appraisal Objective 7) attracting green business and jobs to the Borough; promote the 'circular' economy (Appraisal Objective 8) maintaining and enhancing good access to health, education, sports, leisure and other public amenities for Borough residents (Appraisal Objective 10) ensuring that the Local Plan does not discriminate against equalities target groups and promotes climate justice (Appraisal Objective 12) 												

SA FRAMEWORK OBJECTIVES												
(A) Environmental Sustainability				(B) Sustainable Economic Growth					(C) Sustainable Communities			
	(1) CLIMATE MITIGATION AND NET ZERO To address causes of climate change by minimising CO ₂ emissions and promoting zero carbon in new development	(2) FLOOD RISK AND WATER RESOURCES To avoid, reduce and manage all sources of flood risk to and from development taking account of climate change	(3) OPEN SPACE, GREENING & BNG To enhance provision and quality of Sutton's open environment, promote greening & biodiversity linkages and promote BNG	(4) SUSTAINABLE TRANSPORT, HEALTHY STREETS AND AIR QUALITY To reduce traffic, reduce congestion, local air pollution, promote sustainable transport and healthy streets	(5) TOWN CENTRES To enhance the vitality and viability and regeneration of Sutton Town Centre and town centres throughout Borough and promote access to community shopping facilities.	(6) SUSTAINABLE ECONOMIC GROWTH, LOCAL EMPLOYMENT & SKILLS To promote a strong, sustainable and high-skilled local economy	(7) URBAN REGENERATION & AREA RENEWAL To create world's leading life science district on the LCH site; promote Sutton Link and secure inward investment for area renewal	(8) GREEN ECONOMY DECENT ENERGY; & DECARBONISATION. To attract green business; promote 'circular' economy; promote decentralised energy & decarbonise social housing & buildings	(9) ACCESS TO HOUSING To meet the future local need for housing and affordable housing and the Borough's share of London's need	(10) SOCIAL AND COMMUNITY INFRASTRUCTURE To maintain and enhance good access to health, education, sports, leisure and other public amenities for Borough residents	(11) BUILT AND HISTORIC ENVIRONMENT To protect and enhance the quality of built design, townscape quality, local character and the Borough's historic environment	(12) EQUALITIES, & CLIMATE JUSTICE Avoid discrimination against equalities groups; promote climate justice, address deprivation; promote healthy & safe communities,
+ Small beneficial impact ++ Medium beneficial impact +++ Large beneficial impact X Adverse Impact ? Uncertain impact None/ neutral												
ISSUE 2: SPATIAL STRATEGY- updates Policy 1 of Local Plan 2018												
	OPTION 1: SUTTON TOWN CENTRE-FIRST 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				OPTION 2: SUTTON TOWN AND DISTRICT CENTRE NETWORK 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.				OPTION 3: DISPERSED 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		+	++	++	++	+	++		X	+	++	+
OPTION 2: SUTTON TOWN AND DISTRICT CENTRE NETWORK		+	++?	+	+	++	++		++	++	+	++
OPTION 3: DISPERSED		X	X	X	X	X	++		+++	X	X	X
Option A: Sutton Town Centre-First will have: <u>Medium beneficial effects (++) on</u> <ul style="list-style-type: none"> protecting and enhancing the quality of Sutton's open environment, promoting urban greening (blue and green infrastructure), promoting ecological pathways and securing biodiversity net gain throughout the Borough (Appraisal Objective 3) reducing traffic levels, reducing congestion, cutting local air pollution, promoting active and sustainable modes of transport and promoting healthy streets (Appraisal Objective 4) enhancing the vitality and viability and regeneration of Sutton Town Centre and town centres and promoting access to community shopping facilities (Appraisal Objective 5); promoting area renewal, implementing environmental improvements, supporting the life sciences and attracting investment in infrastructure and high-skilled jobs (Appraisal Objective 7) protecting and enhancing the quality of built design, townscape quality, local character and the Borough's historic environment (Appraisal Objective 11) <u>Small beneficial effects (+) on</u> <ul style="list-style-type: none"> avoiding, reducing and managing all sources of flood risk taking account of climate change (Appraisal Objective 2) ; promoting economic growth and a strong, sustainable and high-skilled local economy (Appraisal Objective 6); maintaining and enhancing good access to health, education, sports, leisure and other public amenities for Borough residents (Appraisal Objective 10) ensuring that the Local Plan does not discriminate against equalities target groups and promotes climate justice (Appraisal Objective 12) <u>Potentially negative beneficial effects (+) on</u> <ul style="list-style-type: none"> helping to meet the future local need for housing and the Borough's share of London's need (Appraisal Objective 9) 									ANALYSIS While Sutton Town Centre and its surrounding (API) would still accommodate most of the borough's development needs, spatial strategy Option C 'dispersed growth' (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) and therefore go further towards meeting Sutton's capped housing needs figure (+++), Option C has a number of potentially negative impacts on key sustainability objectives. 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 Option A 'Sutton Town Centre First' (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. On the other hand, a bigger concentration or expansion of taller buildings would be required within Sutton Town Centre in order to accommodate development and it would be more challenging to deliver family homes and address infrastructure requirements in Sutton Town Centre. The above advantages and disadvantages from a sustainability perspective are reflected in the scores awarded in the appraisal matrix Spatial strategy Option B 'Sutton Town and District Centre Network' (aligned with Option B under Issue 1.1 above) is very much 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.			
Option B: Sutton Town and District Centre Network will have: <u>Medium beneficial effects (++) on</u> <ul style="list-style-type: none"> protecting and enhancing the quality of Sutton's open environment, promoting urban greening (blue and green infrastructure), promoting ecological pathways and securing biodiversity net gain throughout the Borough (Appraisal Objective 3) promoting economic growth and a strong, sustainable and high-skilled local economy (Appraisal Objective 6); promoting area renewal, implementing environmental improvements, supporting the life sciences and attracting investment in infrastructure and high-skilled jobs (Appraisal Objective 7) helping to meet the future local need for housing and the Borough's share of London's need (Appraisal Objective 9) maintaining and enhancing good access to health, education, sports, leisure and other public amenities for Borough residents (Appraisal Objective 10) ensuring that the Local Plan does not discriminate against equalities target groups and promotes climate justice (Appraisal Objective 12) <u>Small beneficial effects (+) on</u> <ul style="list-style-type: none"> avoiding, reducing and managing all sources of flood risk taking account of climate change (Appraisal Objective 2) ; reducing traffic levels, reducing congestion, cutting local air pollution, promoting active and sustainable modes of transport and promoting healthy streets (Appraisal Objective 4) enhancing the vitality and viability and regeneration of Sutton Town Centre and town centres and promoting access to community shopping facilities (Appraisal Objective 5); protecting and enhancing the quality of built design, townscape quality, local character and the Borough's historic environment (Appraisal Objective 11) 												
Option C (minimum of 650 units) will have: <u>Large beneficial effects (+++) on</u> <ul style="list-style-type: none"> helping to meet the future local need for housing and the Borough's share of London's need (Appraisal Objective 9) <u>Medium beneficial effects (++) on</u> <ul style="list-style-type: none"> promoting the LCH and attracting investment in infrastructure and high-skilled jobs (Appraisal Objective 7) <u>Potentially negative beneficial effects (+) on</u> <ul style="list-style-type: none"> avoiding, reducing and managing all sources of flood risk taking account of climate change (Appraisal Objective 2) ; protecting and enhancing the quality of Sutton's open environment, promoting urban greening (blue and green infrastructure), promoting ecological pathways and securing biodiversity net gain (Appraisal Objective 3) reducing traffic levels, reducing congestion, cutting local air pollution, promoting active and sustainable modes of transport and promoting healthy streets (Appraisal Objective 4) enhancing the vitality and viability and regeneration of Sutton Town Centre and town centres and promoting access to community shopping facilities (Appraisal Objective 5); maintaining and enhancing good access to health, education, sports, leisure and other public amenities for Borough residents (Appraisal Objective 10) protecting and enhancing the quality of built design, townscape quality, local character and the Borough's historic environment (Appraisal Objective 11) ensuring that the Local Plan does not discriminate against equalities target groups and promotes climate justice (Appraisal Objective 12) 												

	SA FRAMEWORK OBJECTIVES											
	(A) Environmental Sustainability			(B) Sustainable Economic Growth					(C) Sustainable Communities			
+ Small beneficial impact ++ Medium beneficial impact +++ Large beneficial impact X Adverse Impact ? Uncertain impact None/ neutral	(1) CLIMATE MITIGATION AND NET ZERO To address causes of climate change by minimising CO ₂ emissions and promoting zero carbon in new development	(2) FLOOD RISK AND WATER RESOURCES To avoid, reduce and manage all sources of flood risk to and from development taking account of climate change	(3) OPEN SPACE, GREENING & BNG To enhance provision and quality of Sutton's open environment, promote greening & biodiversity linkages and promote BNG	(4) SUSTAINABLE TRANSPORT, HEALTHY STREETS AND AIR QUALITY To reduce traffic, reduce congestion, local air pollution, promote sustainable transport and healthy streets	(5) TOWN CENTRES To enhance the vitality and viability and regeneration of Sutton Town Centre and town centres throughout Borough and promote access to community shopping facilities.	(6) SUSTAINABLE ECONOMIC GROWTH, LOCAL EMPLOYMENT EDUCATION & SKILLS To promote a strong, sustainable and high-skilled local economy	(7) URBAN REGENERATION & AREA RENEWAL To create world's leading life science district on the LCH site; promote Sutton Link and secure inward investment for area renewal	(8) GREEN ECONOMY DECENT ENERGY; & DECARBONISATION. To attract green business; promote 'circular' economy; promote decentralised energy & decarbonise social housing & buildings	(9) ACCESS TO HOUSING To meet the future local need for housing and affordable housing and the Borough's share of London's need	(10) SOCIAL AND COMMUNITY INFRASTRUCTURE To maintain and enhance good access to health, education, sports, leisure and other public amenities for Borough residents	(11) BUILT AND HISTORIC ENVIRONMENT To protect and enhance the quality of built design, townscape quality, local character and the Borough's historic environment	(12) EQUALITIES, & CLIMATE JUSTICE Avoid discrimination against equalities groups; promote climate justice, address deprivation; promote healthy & safe communities,

ISSUE 3: NET ZERO CARBON - new strategic policy

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

(a) Achieving net zero carbon standards in all new residential and commercial developments, including major refurbishments and changes of use, by (i) minimising energy demand through fabric energy efficiency measures; promoting the efficient supply of energy from locally-generated low or zero carbon sources and maximising on-site renewable energy generation; (ii) offsetting remaining on site carbon emissions by securing developer contributions to fund equivalent carbon reduction measures off-site; and (iii) reducing whole life-cycle emissions arising from unregulated emissions, embodied carbon and eventual demolition.

(b) Working with heat network operators, developers and local communities to promote the development and/or expansion of low or zero carbon district heat networks served by local secondary heat sources, particularly within the Hackbridge area, Sutton Town Centre and other 'Heat Network Priority Areas' identified by the Mayor.

(c) Ensuring that all new Council housing, estate regeneration schemes and new or refurbished Council buildings, schools and other public buildings, achieve net zero carbon standards on-site, incorporate Passivhaus principles and demonstrate exemplary standards of sustainable design and construction in line with nationally recognised schemes.

(d) Implementing energy retrofit measures to zero carbon for existing Council housing, other social housing managed by the Sutton Housing Partnership and other Council-owned buildings in line with the Council's net zero pathway with funding from the Government's public sector decarbonisation scheme, the Council's carbon offset fund and other sources of available funding.

(e) Promoting a low carbon circular economy in accordance with the aims of the Mayor's Environment Strategy; the Mayor's Circular Economy Statement Guidance 2021 and Policy WP7 of the South London Waste Plan Development Plan Document (DPD) by treating construction materials as resources rather than waste and by prioritising the retention of existing built structures above demolition wherever possible; and

(f) Reducing carbon emissions and air pollution from transport in line with the Mayor's Zero Carbon Pathway 2030, Sutton's Sustainable Transport Strategy 2020-25 and 'healthy streets' principles by promoting walking, cycling and public transport use; reducing car dependence; and through the provision of on and off-street charging facilities for ultra-low emission vehicles (ULEVs).

DRAFT POLICY 3: Net Zero Carbon	+++	++		+++		++		+++				+++
LOCAL PLAN 2018: POLICY 31	+	+		+		+		+				+

Draft Strategic Policy 3: Net Zero Carbon is predicted to have:

Large beneficial effects (+++) on

- addressing the causes of climate change by minimising CO₂ emissions and promoting zero carbon standards in new development (Appraisal Objective 1)
- reducing traffic levels, reducing congestion, cutting local air pollution, promoting active and sustainable modes of transport and promoting healthy streets (Appraisal Objective 4)
- attracting green business and jobs to the Borough; promote the 'circular' economy (Appraisal Objective 8)
- ensuring that the Local Plan does not discriminate against equalities target groups and promotes climate justice (Appraisal Objective 12)

Medium beneficial effects (++) on

- promoting economic growth and a strong, sustainable and high-skilled local economy (Appraisal Objective 6);

The 'Business as Usual' option (Local Plan 2018) has:

Small beneficial effects (+) on

- addressing the causes of climate change by minimising CO₂ emissions and promoting zero carbon standards in new development (Appraisal Objective 1)
- reducing traffic levels, reducing congestion, cutting local air pollution, promoting active and sustainable modes of transport and promoting healthy streets (Appraisal Objective 4)
- attracting green business and jobs to the Borough; promote the 'circular' economy (Appraisal Objective 8)
- ensuring that the Local Plan does not discriminate against equalities target groups and promotes climate justice (Appraisal Objective 12)
- promoting economic growth and a strong, sustainable and high-skilled local economy (Appraisal Objective 6);

ANALYSIS

Draft Strategic Policy 3 on 'Net Zero Carbon' 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.

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. This is reflected in the outcome of the appraisal, which identifies large beneficial effects (+++) in relation to (1) climate mitigation and net zero (4) healthy streets and air quality (8) green economy, decentralised energy and decarbonisation; and (12) climate justice.

	SA FRAMEWORK OBJECTIVES											
	(A) Environmental Sustainability				(B) Sustainable Economic Growth				(C) Sustainable Communities			
+ Small beneficial impact ++ Medium beneficial impact +++ Large beneficial impact X Adverse Impact ? Uncertain impact None/ neutral	(1) CLIMATE MITIGATION AND NET ZERO To address causes of climate change by minimising CO ₂ emissions and promoting zero carbon in new development	(2) FLOOD RISK AND WATER RESOURCES To avoid, reduce and manage all sources of flood risk to and from development taking account of climate change	(3) OPEN SPACE, GREENING & BNG To enhance provision and quality of Sutton's open environment, promote greening & biodiversity linkages and promote BNG	(4) SUSTAINABLE TRANSPORT, HEALTHY STREETS AND AIR QUALITY To reduce traffic, reduce congestion, local air pollution, promote sustainable transport and healthy streets	(5) TOWN CENTRES To enhance the vitality and viability and regeneration of Sutton Town Centre and town centres throughout Borough and promote access to community shopping facilities.	(6) SUSTAINABLE ECONOMIC GROWTH, LOCAL EMPLOYMENT EDUCATION & SKILLS To promote a strong, sustainable and high-skilled local economy	(7) URBAN REGENERATION & AREA RENEWAL To create world's leading life science district on the LCH site; promote Sutton Link and secure inward investment for area renewal	(8) GREEN ECONOMY DECENT ENERGY; & DECARBONISATION. To attract green business; promote 'circular' economy; promote decentralised energy & decarbonise social housing & buildings	(9) ACCESS TO HOUSING To meet the future local need for housing and affordable housing and the Borough's share of London's need	(10) SOCIAL AND COMMUNITY INFRASTRUCTURE To maintain and enhance good access to health, education, sports, leisure and other public amenities for Borough residents	(11) BUILT AND HISTORIC ENVIRONMENT To protect and enhance the quality of built design, townscape quality, local character and the Borough's historic environment	(12) EQUALITIES, & CLIMATE JUSTICE Avoid discrimination against equalities groups; promote climate justice, address deprivation; promote healthy & safe communities,

ISSUE 4: FLOOD RISK MANAGEMENT AND MAKING SPACE FOR WATER - new strategic policy

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

(a) Identifying areas where flood risk issues exist now or are likely to exist in future with climate change on the basis of Sutton's Strategic Flood Risk Assessment (SFRA), the borough Surface Water Management Plan (SWMP), flood risk modelling undertaken by the EA for the Wandle, the Beverly Brook and the Pyl Brook and as part of the updates to the national Risk of Flooding from Surface Water Map (RoFSW);

(b) Securing Grant in Aid funding from DEFRA; local levy funding from the EA and the Thames Regional Flood and Coastal Committee ; or Community Infrastructure Levy (CIL) as appropriate for the delivery of strategic flood alleviation schemes in order to reduce the number of properties at risk in accordance with Sutton's Local Flood Risk Management Strategy and Action Plan;

(c) Delivering sustainable drainage (SuDS) retrofit, natural flood management and other urban greening measures within the public realm as part of estate regeneration schemes, wider urban renewal programmes, highway improvements and healthy streets initiatives funded by Transport for London (TFL) and pocket parks in line with the Mayor's SuDS strategy having regard to the London Sustainable Drainage Action Plan and surface water flooding hotspots and SuDS opportunity areas identified in Sutton's Surface Water Management Plan (SWMP);

(d) Avoiding, reducing or mitigating flood risk to people and property by steering vulnerable developments away from the floodplain and other flood risk areas in line with the sequential approach by 'making space for water', and by maximising the multiple benefits of green space networks, ecological pathways and other nature-based solutions for SuDS, flood storage, urban cooling, habitat creation and biodiversity net gain (BNG), recreation and local amenity; and

(e) Maximising opportunities to avoid, reduce and mitigate fluvial flood risk and working with statutory undertakers and other partners including the EA and the South East Rivers Trust to achieve 'good' status for the biological and physio-chemical quality of:

(i) the Wandle as part of the regeneration and restoration of the river in accordance with the aims of the Wandle Catchment Plan and the Wandle Valley Regional Park;

(ii) all other designated 'main rivers' within the borough identified in the Thames River Basin Management Plan, including the Beverley Brook and Pyl Brook

DRAFT POLICY 5: Flood Risk Management and Making Space For Water		+++	+++	++	++						+++	+++
LOCAL PLAN 2018: POLICY 32		++	++	+	+						++	++

<p>Draft Strategic Policy 4 on 'Flood Risk Management and Making Space for Water' is predicted to have:</p> <p><u>Large beneficial effects (+++) on</u></p> <ul style="list-style-type: none"> avoiding, reducing and managing all sources of flood risk taking account of climate change (Appraisal Objective 2) ; protecting and enhancing the quality of Sutton's open environment, promoting urban greening (blue and green infrastructure), promoting ecological pathways and securing biodiversity net gain throughout the Borough (Appraisal Objective 3) protecting and enhancing the quality of built design, townscape quality, local character and the Borough's historic environment (Appraisal Objective 11) ensuring that the Local Plan does not discriminate against equalities target groups and promotes climate justice (Appraisal Objective 12) <p><u>Medium beneficial effects (++) on</u></p> <ul style="list-style-type: none"> reducing traffic levels, reducing congestion, cutting local air pollution, promoting active and sustainable modes of transport and promoting healthy streets (Appraisal Objective 4) enhancing the vitality and viability and regeneration of Sutton Town Centre and town centres and promoting access to community shopping facilities (Appraisal Objective 5) <p>The 'Business as Usual' option (Local Plan 2018) has:</p> <p><u>Medium beneficial effects (++) on</u></p> <ul style="list-style-type: none"> avoiding, reducing and managing all sources of flood risk taking account of climate change (Appraisal Objective 2) ; protecting and enhancing the quality of Sutton's open environment, promoting urban greening (blue and green infrastructure), promoting ecological pathways and securing biodiversity net gain throughout the Borough (Appraisal Objective 3) protecting and enhancing the quality of built design, townscape quality, local character and the Borough's historic environment (Appraisal Objective 11) ensuring that the Local Plan does not discriminate against equalities target groups and promotes climate justice (Appraisal Objective 12) <p><u>Small beneficial effects (+) on</u></p> <ul style="list-style-type: none"> reducing traffic levels, reducing congestion, cutting local air pollution, promoting active and sustainable modes of transport and promoting healthy streets (Appraisal Objective 4) enhancing the vitality and viability and regeneration of Sutton Town Centre and town centres and promoting access to community shopping facilities (Appraisal Objective 5); 	<p>ANALYSIS</p> <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, Draft Strategic Policy 4 on 'Flood Risk Management and Making Space for Water' is assessed as having significant beneficial impacts on a range of key sustainability objectives relating to flood risk management and water resources (2); open space and urban greening (3); the quality of the built environment (11); climate change adaptation and climate justice (12).</p> <p>This policy significantly 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.</p> <p>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>
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SA FRAMEWORK OBJECTIVES												
(A) Environmental Sustainability				(B) Sustainable Economic Growth				(C) Sustainable Communities				
	(1) CLIMATE MITIGATION AND NET ZERO To address causes of climate change by minimising CO ₂ emissions and promoting zero carbon in new development	(2) FLOOD RISK AND WATER RESOURCES To avoid, reduce and manage all sources of flood risk to and from development taking account of climate change	(3) OPEN SPACE, GREENING & BNG To enhance provision and quality of Sutton's open environment, promote greening & biodiversity linkages and promote BNG	(4) SUSTAINABLE TRANSPORT, HEALTHY STREETS AND AIR QUALITY To reduce traffic, reduce congestion, local air pollution, promote sustainable transport and healthy streets	(5) TOWN CENTRES To enhance the vitality and viability and regeneration of Sutton Town Centre and town centres throughout Borough and promote access to community shopping facilities.	(6) SUSTAINABLE ECONOMIC GROWTH, LOCAL EMPLOYMENT EDUCATION & SKILLS To promote a strong, sustainable and high-skilled local economy	(7) URBAN REGENERATION & AREA RENEWAL To create world's leading life science district on the LCH site; promote Sutton Link and secure inward investment for area renewal	(8) GREEN ECONOMY DECENT ENERGY; & DECARBONISATION. To attract green business; promote 'circular' economy; promote decentralised energy & decarbonise social housing & buildings	(9) ACCESS TO HOUSING To meet the future local need for housing and affordable housing and the Borough's share of London's need	(10) SOCIAL AND COMMUNITY INFRASTRUCTURE To maintain and enhance good access to health, education, sports, leisure and other public amenities for Borough residents	(11) BUILT AND HISTORIC ENVIRONMENT To protect and enhance the quality of built design, townscape quality, local character and the Borough's historic environment	(12) EQUALITIES, & CLIMATE JUSTICE Avoid discrimination against equalities groups; promote climate justice, address deprivation; promote healthy & safe communities,
+ Small beneficial impact ++ Medium beneficial impact +++ Large beneficial impact X Adverse Impact ? Uncertain impact None/ neutral												
ISSUE 5: URBAN GREENING AND CLIMATE CHANGE ADAPTATION - new strategic policy												
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 interventions 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.												
DRAFT POLICY 5: Urban Greening and Climate Change Adaptation		+++	+++	+++	++					++	+++	+++
LOCAL PLAN 2018: Policy 33		+	+	+	+					+	+	+
Draft Strategic Policy 5 on 'Urban Greening and Climate Change Adaptation' is predicted to have:							ANALYSIS					
<p><u>Large beneficial effects (+++) on</u></p> <ul style="list-style-type: none"> avoiding, reducing and managing all sources of flood risk taking account of climate change (Appraisal Objective 2) ; protecting and enhancing the quality of Sutton's open environment, promoting urban greening (blue and green infrastructure), promoting ecological pathways and securing biodiversity net gain throughout the Borough (Appraisal Objective 3) reducing traffic levels, reducing congestion, cutting local air pollution, promoting active and sustainable modes of transport and promoting healthy streets (Appraisal Objective 4) protecting and enhancing the quality of built design, townscape quality, local character and the Borough's historic environment (Appraisal Objective 11) ensuring that the Local Plan does not discriminate against equalities target groups and promotes climate justice (Appraisal Objective 12) <p><u>Medium beneficial effects (++) on</u></p> <ul style="list-style-type: none"> enhancing the vitality and viability and regeneration of Sutton Town Centre and town centres and promoting access to community shopping facilities (Appraisal Objective 5); maintaining and enhancing good access to health, education, sports, leisure and other public amenities for Borough residents (Appraisal Objective 10) <p>The 'Business as Usual' option (Local Plan 2018) has:</p> <p><u>Small beneficial effects (+) on</u></p> <ul style="list-style-type: none"> avoiding, reducing and managing all sources of flood risk taking account of climate change (Appraisal Objective 2) ; protecting and enhancing the quality of Sutton's open environment, promoting urban greening (blue and green infrastructure), promoting ecological pathways and securing biodiversity net gain throughout the Borough (Appraisal Objective 3) reducing traffic levels, reducing congestion, cutting local air pollution, promoting active and sustainable modes of transport and promoting healthy streets (Appraisal Objective 4) protecting and enhancing the quality of built design, townscape quality, local character and the Borough's historic environment (Appraisal Objective 11) ensuring that the Local Plan does not discriminate against equalities target groups and promotes climate justice (Appraisal Objective 12) enhancing the vitality and viability and regeneration of Sutton Town Centre and town centres and promoting access to community shopping facilities (Appraisal Objective 5); maintaining and enhancing good access to health, education, sports, leisure and other public amenities for Borough residents (Appraisal Objective 10) 							<p>This is a new strategic policy. By comparison with the current Local Plan 2018, draft Strategic Policy 5 on 'Urban Greening and Climate Change Adaptation' 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 interventions, 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</p> <p>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) CIC 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.</p>					

	SA FRAMEWORK OBJECTIVES											
	(A) Environmental Sustainability				(B) Sustainable Economic Growth				(C) Sustainable Communities			
+ Small beneficial impact ++ Medium beneficial impact +++ Large beneficial impact X Adverse Impact ? Uncertain impact None/ neutral	(1) CLIMATE MITIGATION AND NET ZERO To address causes of climate change by minimising CO ₂ emissions and promoting zero carbon in new development	(2) FLOOD RISK AND WATER RESOURCES To avoid, reduce and manage all sources of flood risk to and from development taking account of climate change	(3) OPEN SPACE, GREENING & BNG To enhance provision and quality of Sutton's open environment, promote greening & biodiversity linkages and promote BNG	(4) SUSTAINABLE TRANSPORT, HEALTHY STREETS AND AIR QUALITY To reduce traffic, reduce congestion, local air pollution, promote sustainable transport and healthy streets	(5) TOWN CENTRES To enhance the vitality and viability and regeneration of Sutton Town Centre and town centres throughout Borough and promote access to community shopping facilities.	(6) SUSTAINABLE ECONOMIC GROWTH, LOCAL EMPLOYMENT EDUCATION & SKILLS To promote a strong, sustainable and high-skilled local economy	(7) URBAN REGENERATION & AREA RENEWAL To create world's leading life science district on the LCH site; promote Sutton Link and secure inward investment for area renewal	(8) GREEN ECONOMY DECENT ENERGY; & DECARBONISATION. To attract green business; promote 'circular' economy; promote decentralised energy & decarbonise social housing & buildings	(9) ACCESS TO HOUSING To meet the future local need for housing and affordable housing and the Borough's share of London's need	(10) SOCIAL AND COMMUNITY INFRASTRUCTURE To maintain and enhance good access to health, education, sports, leisure and other public amenities for Borough residents	(11) BUILT AND HISTORIC ENVIRONMENT To protect and enhance the quality of built design, townscape quality, local character and the Borough's historic environment	(12) EQUALITIES, & CLIMATE JUSTICE Avoid discrimination against equalities groups; promote climate justice, address deprivation; promote healthy & safe communities,

ISSUE 6: BIODIVERSITY AND HABITATS - new strategic policy

The Council will:

(a) Protect and enhance Sites of Importance for Nature Conservation (SINCs); green corridors; continuous blocks of back garden land; and other key ecological pathways including along the length of the River Wandle catchment and Beverly Brook

(b) Support the creation, enhancement and restoration of habitats throughout the borough; promote an overall increase in biodiversity value across the borough (as measured by the Statutory Metric for BNG); reduce areas of nature conservation deficiency and improve public access to nature over the Local Plan Review period in line with Sutton's Local Biodiversity Action Plan and, when introduced, the Local Nature Recovery Plan targets. Options for habitat creation and biodiversity enhancement targets are as follows

OPTIONS

- 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 of the borough where (i) the current baseline biodiversity value is low e.g. Sutton Town Centre or where (ii) opportunities exist for habitat creation e.g. Beddington Farmlands/ Beddington Park (Statutory Metric).

(c) Secure the progressive restoration of Beddington Farmlands and promote its role as part of the Wandle Valley Regional Park and the Mayor's Green Grid.

(d) Work with developers, the EA, the South East Rivers Trust and other strategic partners to deliver environmental enhancement projects on the River Wandle in line with the aims of the Wandle Catchment Plan, promote the naturalisation of river catchments, by taking all opportunities to de-culvert the River Wandle and smaller watercourses through making space for water and re-naturalising river banks wherever possible.

(e) Ensure that proposed developments do not prejudice the implementation of Water Framework Directive measures contained in the EA's Catchment Planning system.

(f) Work with local communities to create pocket parks, establish community gardens and plant trees where there is a deficit.

(g) Ensure that all 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.

PREFERRED OPTION (Options 1-4 inclusive)		++	+++	+	+					++	++	+++
OPTION 1: Habitat creation		+	++	+?	+?					+	+	++
OPTION 2 Protecting SINCs		+	++	+?	+?					+	+	++
OPTION 3 Increasing biodiversity value (borough)		+	++	+?	+?					+	+	++
OPTION 4 Increasing biodiversity value (specific areas)		+	++	+?	+?					+	+	++

The Preferred Option for Draft Strategic Policy 6 on 'Biodiversity and Habitats (Options 1-4 inclusive) is predicted to have:

Large beneficial effects (+++) on

- protecting and enhancing the quality of Sutton's open environment, promoting urban greening), promoting ecological pathways and securing biodiversity net gain (Appraisal Objective 3)
- ensuring that the Local Plan does not discriminate against equalities target groups and promotes climate justice (Appraisal Objective 12)

Medium beneficial effects (++) on

- avoiding, reducing and managing all sources of flood risk taking account of climate change (Appraisal Objective 2);
- maintaining and enhancing good access to health, education, sports, leisure and other public amenities for Borough residents (Appraisal Objective 10)
- protecting and enhancing the quality of built design, townscape quality, local character and the Borough's historic environment (Appraisal Objective 11)

Small beneficial effects (+) on

- reducing traffic levels, reducing congestion, cutting local air pollution, promoting active and sustainable modes of transport and promoting healthy streets (Appraisal Objective 4)
- enhancing the vitality and viability and regeneration of Sutton Town Centre and town centres and promoting access to community shopping facilities (Appraisal Objective 5)

Each of the four alternative Option for Draft Strategic Policy 6 on 'Biodiversity and Habitats (Options 1-4 inclusive) is predicted to have:

Medium beneficial effects (++) on

- protecting and enhancing the quality of Sutton's open environment, promoting urban greening), promoting ecological pathways and securing biodiversity net gain (Appraisal Objective 3)
- ensuring that the Local Plan does not discriminate against equalities target groups and promotes climate justice (Appraisal Objective 12)

Small beneficial effects (+) on

- avoiding, reducing and managing all sources of flood risk taking account of climate change (Appraisal Objective 2);
- reducing traffic levels, reducing congestion, cutting local air pollution, promoting active and sustainable modes of transport and promoting healthy streets (Appraisal Objective 4)
- enhancing the vitality and viability and regeneration of Sutton Town Centre and town centres and promoting access to community shopping facilities (Appraisal Objective 5)
- maintaining and enhancing good access to health, education, sports, leisure and other public amenities for Borough residents (Appraisal Objective 10)
- protecting and enhancing the quality of built design, townscape quality, local character and the Borough's historic environment (Appraisal Objective 11)

ANALYSIS

This is a new strategic policy. The outcome of the appraisal shows that all four policy options for issue 6 'Biodiversity and Habitats' would have large or medium sustainability benefits in relation to open space, urban greening and biodiversity net gain (BNG) (SA objective 3); flood risk management (SA objective 3); social and community infrastructure (SA objective 10); the climate adaptation/ BNG element of enhancing the quality of the design and layout of new developments (SA objective 10); and climate justice (SA objective 12). The **Preferred Option for issue 6** - 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.

SA FRAMEWORK OBJECTIVES												
(A) Environmental Sustainability				(B) Sustainable Economic Growth					(C) Sustainable Communities			
	(1) CLIMATE MITIGATION AND NET ZERO To address causes of climate change by minimising CO ₂ emissions and promoting zero carbon in new development	(2) FLOOD RISK AND WATER RESOURCES To avoid, reduce and manage all sources of flood risk to and from development taking account of climate change	(3) OPEN SPACE, GREENING & BNG To enhance provision and quality of Sutton's open environment, promote greening & biodiversity linkages and promote BNG	(4) SUSTAINABLE TRANSPORT, HEALTHY STREETS AND AIR QUALITY To reduce traffic, reduce congestion, local air pollution, promote sustainable transport and healthy streets	(5) TOWN CENTRES To enhance the vitality and viability and regeneration of Sutton Town Centre and town centres throughout Borough and promote access to community shopping facilities.	(6) SUSTAINABLE ECONOMIC GROWTH, LOCAL EMPLOYMENT EDUCATION & SKILLS To promote a strong, sustainable and high-skilled local economy	(7) URBAN REGENERATION & AREA RENEWAL To create world's leading life science district on the LCH site; promote Sutton Link and secure inward investment for area renewal	(8) GREEN ECONOMY DECENT ENERGY; & DECARBONISATION. To attract green business; promote 'circular' economy; promote decentralised energy & decarbonise social housing & buildings	(9) ACCESS TO HOUSING To meet the future local need for housing and affordable housing and the Borough's share of London's need	(10) SOCIAL AND COMMUNITY INFRASTRUCTURE To maintain and enhance good access to health, education, sports, leisure and other public amenities for Borough residents	(11) BUILT AND HISTORIC ENVIRONMENT To protect and enhance the quality of built design, townscape quality, local character and the Borough's historic environment	(12) EQUALITIES, & CLIMATE JUSTICE Avoid discrimination against equalities groups; promote climate justice, address deprivation; promote healthy & safe communities,
+ Small beneficial impact ++ Medium beneficial impact +++ Large beneficial impact X Adverse Impact ? Uncertain impact None/ neutral												
ISSUE 7: STRATEGIC TRANSPORT INFRASTRUCTURE- new strategic policy												
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.												
DRAFT POLICY 7: Strategic Transport Infrastructure	++	++	++	+++	+++	+++	+++			+++	+	+++
LOCAL PLAN 2018: Policy 35	+	+	+	++	++	++	++			++	+	++
Subject to the necessary TfL funding being secured, draft Strategic Policy 7 on 'Strategic Transport Infrastructure' is predicted to have:							ANALYSIS					
<u>Large beneficial effects (+++) on</u>							The outcome of the appraisal shows that, subject to the necessary funding being secured from Transport for London (TfL) and other sources, draft Strategic Policy Option 7 on 'Strategic Transport Infrastructure' will have significant sustainability 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 into one of the world's leading life science research districts (via Sutton Link); supporting the regeneration of Sutton Town Centre through improved 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); and minimising the disproportionate impact of local air pollution, congestion and long-term climate impacts for vulnerable Borough residents (i.e. climate justice) and on townscape quality. The appraisal scores for draft Strategic Policy Option 7 (see above) are higher than the 'business as usual' scenario (Local Plan 2018) since investment in strategic transport infrastructure is now identified as a strategic policy in the new Local Plan.					
<ul style="list-style-type: none"> reducing traffic levels, reducing congestion, cutting local air pollution, promoting active and sustainable modes of transport and promoting healthy streets (Appraisal Objective 4) enhancing the vitality and viability and regeneration of Sutton Town Centre and town centres and promoting access to community shopping facilities (Appraisal Objective 5); promoting economic growth and a strong, sustainable and high-skilled local economy (Appraisal Objective 6); promoting area renewal, implementing environmental improvements, supporting the life sciences and attracting investment in infrastructure and high-skilled jobs (Appraisal Objective 7) maintaining and enhancing good access to health, education, sports, leisure and other public amenities for Borough residents (Appraisal Objective 10) ensuring that the Local Plan does not discriminate against equalities target groups and promotes climate justice (Appraisal Objective 12) 												
<u>Medium beneficial effects (++) on</u>												
<ul style="list-style-type: none"> addressing the causes of climate change by minimising CO₂ emissions and promoting zero carbon standards in new development (Appraisal Objective 1) avoiding, reducing and managing all sources of flood risk taking account of climate change (Appraisal Objective 2) ; protecting and enhancing the quality of Sutton's open environment, promoting urban greening (blue and green infrastructure), promoting ecological pathways and securing biodiversity net gain throughout the Borough (Appraisal Objective 3) 												
<u>Small beneficial effects (+) on</u>												
<ul style="list-style-type: none"> protecting and enhancing the quality of built design, townscape quality, local character and the Borough's historic environment (Appraisal Objective 11) 												
The 'Business as Usual' Local Plan 2018 option predicted to have:												
<u>Medium beneficial effects (++) on</u>												
<ul style="list-style-type: none"> reducing traffic levels, reducing congestion, cutting local air pollution, promoting active and sustainable modes of transport and promoting healthy streets (Appraisal Objective 4) enhancing the vitality and viability and regeneration of Sutton Town Centre and town centres and promoting access to community shopping facilities (Appraisal Objective 5); promoting economic growth and a strong, sustainable and high-skilled local economy (Appraisal Objective 6); promoting area renewal, implementing environmental improvements, supporting the life sciences and attracting investment in infrastructure and high-skilled jobs (Appraisal Objective 7) maintaining and enhancing good access to health, education, sports, leisure and other public amenities for Borough residents (Appraisal Objective 10) ensuring that the Local Plan does not discriminate against equalities target groups and promotes climate justice (Appraisal Objective 12) 												
<u>Small beneficial effects (+) on</u>												
<ul style="list-style-type: none"> addressing the causes of climate change by minimising CO₂ emissions and promoting zero carbon standards in new development (Appraisal Objective 1) avoiding, reducing and managing all sources of flood risk taking account of climate change (Appraisal Objective 2) ; protecting and enhancing the quality of Sutton's open environment, promoting urban greening (blue and green infrastructure), promoting ecological pathways and securing biodiversity net gain throughout the Borough (Appraisal Objective 3) protecting and enhancing the quality of built design, townscape quality, local character and the Borough's historic environment (Appraisal Objective 11) 												

SA FRAMEWORK OBJECTIVES												
(A) Environmental Sustainability				(B) Sustainable Economic Growth				(C) Sustainable Communities				
+ Small beneficial impact ++ Medium beneficial impact +++ Large beneficial impact X Adverse Impact ? Uncertain impact None/ neutral	(1) CLIMATE MITIGATION AND NET ZERO To address causes of climate change by minimising CO ₂ emissions and promoting zero carbon in new development	(2) FLOOD RISK AND WATER RESOURCES To avoid, reduce and manage all sources of flood risk to and from development taking account of climate change	(3) OPEN SPACE, GREENING & BNG To enhance provision and quality of Sutton's open environment, promote greening & biodiversity linkages and promote BNG	(4) SUSTAINABLE TRANSPORT, HEALTHY STREETS AND AIR QUALITY To reduce traffic, reduce congestion, local air pollution, promote sustainable transport and healthy streets	(5) TOWN CENTRES To enhance the vitality and viability and regeneration of Sutton Town Centre and town centres throughout Borough and promote access to community shopping facilities.	(6) SUSTAINABLE ECONOMIC GROWTH, LOCAL EMPLOYMENT EDUCATION & SKILLS To promote a strong, sustainable and high-skilled local economy	(7) URBAN REGENERATION & AREA RENEWAL To create world's leading life science district on the LCH site; promote Sutton Link and secure inward investment for area renewal	(8) GREEN ECONOMY DECENT ENERGY; & DECARBONISATION. To attract green business; promote 'circular' economy; promote decentralised energy & decarbonise social housing & buildings	(9) ACCESS TO HOUSING To meet the future local need for housing and affordable housing and the Borough's share of London's need	(10) SOCIAL AND COMMUNITY INFRASTRUCTURE To maintain and enhance good access to health, education, sports, leisure and other public amenities for Borough residents	(11) BUILT AND HISTORIC ENVIRONMENT To protect and enhance the quality of built design, townscape quality, local character and the Borough's historic environment	(12) EQUALITIES, & CLIMATE JUSTICE Avoid discrimination against equalities groups; promote climate justice, address deprivation; promote healthy & safe communities,

STRATEGIC POLICIES: AREA STRATEGIES

ISSUE 8: LONDON CANCER HUB - updates Policy 2 of Local Plan 2018

- (a) The Council supports the ambition for the LCH to be a state-of-the-art life science campus specialising in cancer research, treatment, and enterprise. To facilitate the delivery of the LCH site, the Council will set out a specific policy and also identify it through a Site Allocation in the Local Plan Review.
- (b) The Council expects a co-ordinated and coherent approach to the overall redevelopment of the LCH site, which includes land owned or operated by the Council, Harris Academy, Institute of Cancer Research, Royal Marsden Hospital, Epsom and St.Helier University Trust, and Aviva Capital Partners.
- (c) The Council expects that all interested parties, landowners, and developers will collaborate to deliver an integrated masterplan for the whole of the LCH site.
- (d) In the short to medium term, proposals will focus on land under a leasehold by Aviva Capital Partners to deliver a life science campus. However, this proposal must be integrated with the wider ambitions for the overall London Cancer Hub site, including emerging proposals by ESTH for the SECH.
- (e) To achieve the Council's objectives, the policy framework and site allocation will:
 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.
- (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.
- (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.

DRAFT POLICY 8: LONDON CANCER HUB (LCH)	++	++	++	+		+++	+++	+++	+	+++	+	++
LOCAL PLAN 2018: Policy 2	+	+	+	?		++	++	++	?	++	+	+

- Draft Strategic (Area-based) Policy 8 on 'London Cancer Hub' is predicted to have:**
- Large beneficial effects (+++) on
- promoting economic growth and a strong, sustainable and high-skilled local economy (Appraisal Objective 6);
 - promoting area renewal, implementing environmental improvements, supporting the life sciences and attracting investment in infrastructure and high-skilled jobs (Appraisal Objective 7)
 - attracting green business and jobs to the Borough; promote the 'circular' economy (Appraisal Objective 8)
 - maintaining and enhancing good access to health, education, sports, leisure and other public amenities for Borough residents (Appraisal Objective 10)
- Medium beneficial effects (++) on
- addressing the causes of climate change by minimising CO₂ emissions and promoting zero carbon standards in new development (Appraisal Objective 1)
 - avoiding, reducing and managing all sources of flood risk taking account of climate change (Appraisal Objective 2) ;
 - protecting and enhancing the quality of Sutton's open environment, promoting urban greening (blue and green infrastructure), promoting ecological pathways and securing biodiversity net gain throughout the Borough (Appraisal Objective 3)
 - reducing traffic levels, reducing congestion, cutting local air pollution, promoting active and sustainable modes of transport and promoting healthy streets (Appraisal Objective 4)
 - ensuring that the Local Plan does not discriminate against equalities target groups and promotes climate justice (Appraisal Objective 12)
- Small beneficial effects (+) on
- helping to meet the future local need for housing and the Borough's share of London's need (Appraisal Objective 9)
 - protecting and enhancing the quality of built design, townscape quality, local character (Appraisal Objective 11)
- The 'Business as Usual' Local Plan 2018 option (Strategic Policy 4) is predicted to have:**
- Medium beneficial effects (++) on
- promoting economic growth and a strong, sustainable and high-skilled local economy (Appraisal Objective 6);
 - promoting area renewal, implementing environmental improvements, supporting the life sciences and attracting investment in infrastructure and high-skilled jobs (Appraisal Objective 7)
 - attracting green business and jobs to the Borough; promote the 'circular' economy (Appraisal Objective 8)
 - maintaining and enhancing good access to health, education, sports, leisure and other public amenities for Borough residents (Appraisal Objective 10)
- Small beneficial effects (+) on
- addressing the causes of climate change by minimising CO₂ emissions and promoting zero carbon standards in new development (Appraisal Objective 1)
 - avoiding, reducing and managing all sources of flood risk taking account of climate change (Appraisal Objective 2) ;
 - protecting and enhancing the quality of Sutton's open environment, promoting urban greening (blue and green infrastructure), promoting ecological pathways and securing biodiversity net gain throughout the Borough (Appraisal Objective 3)
 - reducing traffic levels, reducing congestion, cutting local air pollution, promoting active and sustainable modes of transport and promoting healthy streets (Appraisal Objective 4)
 - ensuring that the Local Plan does not discriminate against equalities target groups and promotes climate justice (Appraisal Objective 12)
 - protecting and enhancing the quality of built design, townscape quality, local character (Appraisal Objective 11)

ANALYSIS

The outcome of the appraisal shows that **Draft Strategic Policy 8 on 'London Cancer Hub'** and the associated Local Plan site allocation will have significant potentially sustainability benefits in terms of promoting a strong, sustainable and high-skilled local economy, attracting investment in community and social infrastructure (e.g. new SECH hospital), new career opportunities and urban renewal by supporting the Council's ambition for the proposed LCH to be a world leading life science campus specialising in cancer research, treatment, and enterprise. There is now an explicit commitment within the scope of this draft policy to ensure that the phased 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. There is also a commitment to develop the LCH is expected to be delivered to the highest standards of design and layout in accordance with the Council's policies on design, character and appearance, heritage, and environmental protection, and this will be taken forward in collaboration with the local community, businesses and other relevant stakeholders. The scores awarded in the above appraisal matrix reflect these sustainability benefits.

SA FRAMEWORK OBJECTIVES												
(A) Environmental Sustainability				(B) Sustainable Economic Growth				(C) Sustainable Communities				
+ Small beneficial impact ++ Medium beneficial impact +++ Large beneficial impact X Adverse Impact ? Uncertain impact None/ neutral	(1) CLIMATE MITIGATION AND NET ZERO To address causes of climate change by minimising CO ₂ emissions and promoting zero carbon in new development	(2) FLOOD RISK AND WATER RESOURCES To avoid, reduce and manage all sources of flood risk to and from development taking account of climate change	(3) OPEN SPACE, GREENING & BNG To enhance provision and quality of Sutton's open environment, promote greening & biodiversity linkages and promote BNG	(4) SUSTAINABLE TRANSPORT, HEALTHY STREETS AND AIR QUALITY To reduce traffic, reduce congestion, local air pollution, promote sustainable transport and healthy streets	(5) TOWN CENTRES To enhance the vitality and viability and regeneration of Sutton Town Centre and town centres throughout Borough and promote access to community shopping facilities.	(6) SUSTAINABLE ECONOMIC GROWTH, LOCAL EMPLOYMENT EDUCATION & SKILLS To promote a strong, sustainable and high-skilled local economy	(7) URBAN REGENERATION & AREA RENEWAL To create world's leading life science district on the LCH site; promote Sutton Link and secure inward investment for area renewal	(8) GREEN ECONOMY DECENT ENERGY; & DECARBONISATION. To attract green business; promote 'circular' economy; promote decentralised energy & decarbonise social housing & buildings	(9) ACCESS TO HOUSING To meet the future local need for housing and affordable housing and the Borough's share of London's need	(10) SOCIAL AND COMMUNITY INFRASTRUCTURE To maintain and enhance good access to health, education, sports, leisure and other public amenities for Borough residents	(11) BUILT AND HISTORIC ENVIRONMENT To protect and enhance the quality of built design, townscape quality, local character and the Borough's historic environment	(12) EQUALITIES, & CLIMATE JUSTICE Avoid discrimination against equalities groups; promote climate justice, address deprivation; promote healthy & safe communities,

ISSUE 9: SUTTON TOWN CENTRE - updates Policy 3 of Local Plan 2018

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

New Housing (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&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. .

Retail and Town Centre Uses (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. .

Modern Office Spaces (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. .

Leisure and Food and Beverage Spaces (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. .

Community Uses
(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. .

Transport and Sutton Link,
(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.

Transforming the Gyrotory, (i) The Council will support proposals that will soften the effects of the gyrotory, 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 gyrotory and to reduce the barrier effect of the gyrotory 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 gyrotory. Proposals that involve enhancement to the gyrotory should have regard to the Sutton Town Centre Public Realm Design Guide SPD. .

Tall Buildings (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. .

Heritage (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. .

Infrastructure (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. .

DRAFT POLICY 9: SUTTON TOWN CENTRE	++	++	++	++	+++	++	+++	++	+++	+++	+++	+++
LOCAL PLAN 2018: Policy 3	+	+	+	++?	++	+	++	+	++	++	++	++

Draft Strategic (Area-based) Policy 9 on 'Sutton Town Centre' is predicted to have:

Large beneficial effects (+++) on

- enhancing the vitality and viability and regeneration of Sutton Town Centre and town centres and promoting access to community shopping facilities (Appraisal Objective 5);
- promoting area renewal, implementing environmental improvements (Appraisal Objective 7)
- helping to meet the future local need for housing and the Borough's share of London's need (Appraisal Objective 9)
- maintaining and enhancing good access to health, education, sports, leisure and other public amenities for Borough residents (Appraisal Objective 10)
- protecting and enhancing the quality of built design, townscape quality, local character and the Borough's historic environment (Appraisal Objective 11)
- ensuring that the Local Plan does not discriminate against equalities target groups and promotes climate justice (Appraisal Objective 12)

Medium beneficial effects (++) on

- addressing the causes of climate change by minimising CO₂ emissions and promoting zero carbon standards in new development (Appraisal Objective 1)
- avoiding, reducing and managing all sources of flood risk taking account of climate change (Appraisal Objective 2) ;
- protecting and enhancing the quality of Sutton's open environment, promoting urban greening (blue and green infrastructure), promoting ecological pathways and securing biodiversity net gain throughout the Borough (Appraisal Objective 3)
- reducing traffic levels, reducing congestion, cutting local air pollution, promoting active and sustainable modes of transport and promoting healthy streets (Appraisal Objective 4)
- promoting economic growth and a strong, sustainable and high-skilled local economy (Appraisal Objective 6);
- attracting green business and jobs to the Borough; promote the 'circular' economy (Appraisal Objective 8)

The 'Business as Usual' Local Plan 2018 option (Strategic Policy 4) is predicted to have:

Medium beneficial effects (++) on

- enhancing the vitality and viability and regeneration of Sutton Town Centre and town centres and promoting access to community shopping facilities (Appraisal Objective 5);
- helping to meet the future local need for housing and the Borough's share of London's need (Appraisal Objective 9)
- maintaining and enhancing good access to health, education, sports, leisure and other public amenities for Borough residents (Appraisal Objective 10)
- protecting and enhancing the quality of built design, townscape quality, local character and the Borough's historic environment (Appraisal Objective 11)
- ensuring that the Local Plan does not discriminate against equalities target groups and promotes climate justice (Appraisal Objective 12)

Small beneficial effects (+) on

- addressing the causes of climate change by minimising CO₂ emissions and promoting zero carbon standards in new development (Appraisal Objective 1)
- avoiding, reducing and managing all sources of flood risk taking account of climate change (Appraisal Objective 2) ;
- protecting and enhancing the quality of Sutton's open environment, promoting urban greening (blue and green infrastructure), promoting ecological pathways and securing biodiversity net gain (Objective 3)
- reducing traffic levels, reducing congestion, cutting local air pollution, promoting active and sustainable modes of transport and promoting healthy streets (Appraisal Objective 4)
- promoting economic growth and a strong, sustainable and high-skilled local economy (Appraisal Objective 6);
- attracting green business and jobs to the Borough; promote the 'circular' economy (Appraisal Objective 8)
- promoting area renewal, implementing environmental improvements (Appraisal Objective 7)

ANALYSIS

The outcome of the appraisal shows that **draft Strategic (Area-based) Policy 9 on 'Sutton Town Centre'** will have significant benefits for the majority of the sustainability objectives making up the appraisal framework, particularly in terms of helping to meet local need for housing and the Borough's share of London's need (whichever spatial strategy is pursued under Policy Issue 2); enhancing the vitality and viability and regeneration of Sutton Town Centre; promoting economic growth; an enhanced, greener public realm; conserving and enhancing the setting and heritage significance of the Sutton Town Centre Conservation Area; 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 area-based 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 gyrotory, 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.

	SA FRAMEWORK OBJECTIVES											
	(A) Environmental Sustainability			(B) Sustainable Economic Growth					(C) Sustainable Communities			
+ Small beneficial impact ++ Medium beneficial impact +++ Large beneficial impact X Adverse Impact ? Uncertain impact None/ neutral	(1) CLIMATE MITIGATION AND NET ZERO To address causes of climate change by minimising CO ₂ emissions and promoting zero carbon in new development	(2) FLOOD RISK AND WATER RESOURCES To avoid, reduce and manage all sources of flood risk to and from development taking account of climate change	(3) OPEN SPACE, GREENING & BNG To enhance provision and quality of Sutton's open environment, promote greening & biodiversity linkages and promote BNG	(4) SUSTAINABLE TRANSPORT, HEALTHY STREETS AND AIR QUALITY To reduce traffic, reduce congestion, local air pollution, promote sustainable transport and healthy streets	(5) TOWN CENTRES To enhance the vitality and viability and regeneration of Sutton Town Centre and town centres throughout Borough and promote access to community shopping facilities.	(6) SUSTAINABLE ECONOMIC GROWTH, LOCAL EMPLOYMENT EDUCATION & SKILLS To promote a strong, sustainable and high-skilled local economy	(7) URBAN REGENERATION & AREA RENEWAL To create world's leading life science district on the LCH site; promote Sutton Link and secure inward investment for area renewal	(8) GREEN ECONOMY DECENT ENERGY; & DECARBONISATION. To attract green business; promote 'circular' economy; promote decentralised energy & decarbonise social housing & buildings	(9) ACCESS TO HOUSING To meet the future local need for housing and affordable housing and the Borough's share of London's need	(10) SOCIAL AND COMMUNITY INFRASTRUCTURE To maintain and enhance good access to health, education, sports, leisure and other public amenities for Borough residents	(11) BUILT AND HISTORIC ENVIRONMENT To protect and enhance the quality of built design, townscape quality, local character and the Borough's historic environment	(12) EQUALITIES, & CLIMATE JUSTICE Avoid discrimination against equalities groups; promote climate justice, address deprivation; promote healthy & safe communities,
ISSUE 10: DISTRICT CENTRES STRATEGY - updates Policy 6 of Local Plan 2018												
All District Centres												
The Council will support District Centres to meet the retail, community and leisure needs of the borough's residents, and to accommodate housing and employment growth which respects the character and historic environment.												
The Council will direct retail and town centre uses to the Primary Shopping Areas defined for each of the District Centres. Proposals for retail and town centre development will be supported in accordance with Issue 27 Town Centres and Retail.												
The Council will support the delivery of better retail space and other town centre uses which meet local needs.												
The Council will enable delivery of new homes in the District Centres in accordance with the spatial strategy.												
The Council will expect proposals to deliver high quality, well-designed development which respects the character of the centre and improves the public realm/interface.												
10.1 Carshalton District Centre												
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												
DRAFT POLICY 10.1: Carshalton District Centre			+	+	++	+				+	++	+
LOCAL PLAN 2018: Policy 6			+	+	++	+				+	+	+
10.2 Cheam District Centre												
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												
DRAFT POLICY 10.2: Cheam District Centre			+	+	++	+				+	++	+
LOCAL PLAN 2018: Policy 6			+	+	++	+				+	+	+
10.3 Hackbridge District Centre												
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.												
DRAFT POLICY 10.3: Hackbridge District Centre			++	+	++	+	++	++	+	+	++	+
LOCAL PLAN 2018: Policy 6			+	+	++	+	++	+	+	+	+	+
10.4 North Cheam District Centre												
(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.												
DRAFT POLICY 10.4: North Cheam District Centre			++	+	++	+	++			+	++	+
LOCAL PLAN 2018: Policy 6			+	+	++	+	++			+	+	+

SA FRAMEWORK OBJECTIVES												
(A) Environmental Sustainability				(B) Sustainable Economic Growth					(C) Sustainable Communities			
	(1) CLIMATE MITIGATION AND NET ZERO To address causes of climate change by minimising CO ₂ emissions and promoting zero carbon in new development	(2) FLOOD RISK AND WATER RESOURCES To avoid, reduce and manage all sources of flood risk to and from development taking account of climate change	(3) OPEN SPACE, GREENING & BNG To enhance provision and quality of Sutton's open environment, promote greening & biodiversity linkages and promote BNG	(4) SUSTAINABLE TRANSPORT, HEALTHY STREETS AND AIR QUALITY To reduce traffic, reduce congestion, local air pollution, promote sustainable transport and healthy streets	(5) TOWN CENTRES To enhance the vitality and viability and regeneration of Sutton Town Centre and town centres throughout Borough and promote access to community shopping facilities.	(6) SUSTAINABLE ECONOMIC GROWTH, LOCAL EMPLOYMENT EDUCATION & SKILLS To promote a strong, sustainable and high-skilled local economy	(7) URBAN REGENERATION & AREA RENEWAL To create world's leading life science district on the LCH site; promote Sutton Link and secure inward investment for area renewal	(8) GREEN ECONOMY DECENT ENERGY; & DECARBONISATION. To attract green business; promote 'circular' economy; promote decentralised energy & decarbonise social housing & buildings	(9) ACCESS TO HOUSING To meet the future local need for housing and affordable housing and the Borough's share of London's need	(10) SOCIAL AND COMMUNITY INFRASTRUCTURE To maintain and enhance good access to health, education, sports, leisure and other public amenities for Borough residents	(11) BUILT AND HISTORIC ENVIRONMENT To protect and enhance the quality of built design, townscape quality, local character and the Borough's historic environment	(12) EQUALITIES, & CLIMATE JUSTICE Avoid discrimination against equalities groups; promote climate justice, address deprivation; promote healthy & safe communities,
+ Small beneficial impact ++ Medium beneficial impact +++ Large beneficial impact X Adverse Impact ? Uncertain impact None/ neutral												
10.5 Rosehill District Centre												
(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												
DRAFT POLICY 10.5: Rosehill District Centre			++	+	++	+	++	++		+	++	+
LOCAL PLAN 2018: Policy 6			+	+	++	+	++	+		+	+	+
10.6 Wallington District Centre												
(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 Road (ff) The Council will seek opportunities to improve the public realm to improve the pedestrian environment, enhance connectivity and accessibility, and improve the access and legibility to and from Wallington station (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												
DRAFT POLICY 10.6: Wallington District Centre			++	+	++	+	++		+	+	++	+
LOCAL PLAN 2018: Policy 6			+	+	++	+	++		+	+	+	+
10.7 Worcester Park: District Centre												
(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												
DRAFT POLICY 10.7: Worcester Park District Centre		++	++	+	++	+	++			+	++	+
LOCAL PLAN 2018: Policy 6		+	+	+	++	+	++			+	+	+
Overall - Draft Policy Issue 10 on 'District Centres Strategy' is predicted to have:							ANALYSIS					
<u>Medium beneficial effects (++) on</u> <ul style="list-style-type: none"> addressing the causes of climate change by minimising CO₂ emissions and promoting zero carbon standards in new development (Appraisal Objective 1) (Rosehill and Hackbridge) avoiding, reducing and managing all sources of flood risk taking account of climate change (Appraisal Objective 2) (Worcester Park flood alleviation scheme) protecting and enhancing the quality of Sutton's open environment, promoting urban greening (blue and green infrastructure), promoting ecological pathways and securing biodiversity net gain throughout the Borough (Appraisal Objective 3) enhancing the vitality and viability of town centres and promoting access to community shopping (Appraisal Objective 5); helping to meet the future local need for housing and the Borough's share of London's need (Appraisal Objective 9) (especially Wallington and Hackbridge district centres) promoting area renewal, implementing environmental improvements (Appraisal Objective 7) attracting green business and jobs to the Borough; promote the 'circular' economy (Appraisal Objective 8) (especially Rosehill and Hackbridge) protecting and enhancing the quality of built design, townscape quality, local character and the Borough's historic environment (Appraisal Objective 11) <u>Small beneficial effects (+) on</u> <ul style="list-style-type: none"> reducing traffic levels, reducing congestion, cutting local air pollution, promoting active and sustainable modes of transport and promoting healthy streets (Appraisal Objective 4) promoting economic growth and a strong, sustainable and high-skilled local economy (Appraisal Objective 6); maintaining and enhancing good access to health, education, sports, leisure and other public amenities for Borough residents (Appraisal Objective 10) ensuring that the Local Plan does not discriminate against equalities target groups and promotes climate justice (Appraisal Objective 12) 							Overall, the draft District Centres Strategy set out under Policy Issue 10 will have benefits for the majority of the sustainability objectives making up the appraisal framework, particularly 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 and improving the connectivity and accessibility of the pedestrian environment are a common thread for all seven district centres. However, the outcome of the appraisal reflects the distinctive characteristics and circumstances affecting each district centre, in terms of townscape quality and the historic environment and the differing potential of each centre to accommodate housing growth. For example, Wallington and Hackbridge district centres are considered more likely to contribute towards meeting Borough-wide housing needs; Hackbridge and Rosehill district centres are considered more likely to support the expansion of low carbon decentralised energy networks; flood alleviation measures are more relevant to Worcester Park and the protection of the historic environment, local character and townscape quality are expected to be afforded greater priority within Carshalton Village and Cheam. It should be noted however that many of the positive impacts identified in the above appraisal matrices will be influenced by the spatial strategy for the development and growth of the Borough which is eventually followed (under Issue 2) and other relevant policies included within the Local Plan.					

SA FRAMEWORK OBJECTIVES												
(A) Environmental Sustainability				(B) Sustainable Economic Growth				(C) Sustainable Communities				
+ Small beneficial impact ++ Medium beneficial impact +++ Large beneficial impact X Adverse Impact ? Uncertain impact None/ neutral	(1) CLIMATE MITIGATION AND NET ZERO To address causes of climate change by minimising CO ₂ emissions and promoting zero carbon in new development	(2) FLOOD RISK AND WATER RESOURCES To avoid, reduce and manage all sources of flood risk to and from development taking account of climate change	(3) OPEN SPACE, GREENING & BNG To enhance provision and quality of Sutton's open environment, promote greening & biodiversity linkages and promote BNG	(4) SUSTAINABLE TRANSPORT, HEALTHY STREETS AND AIR QUALITY To reduce traffic, reduce congestion, local air pollution, promote sustainable transport and healthy streets	(5) TOWN CENTRES To enhance the vitality and viability and regeneration of Sutton Town Centre and town centres throughout Borough and promote access to community shopping facilities.	(6) SUSTAINABLE ECONOMIC GROWTH, LOCAL EMPLOYMENT EDUCATION & SKILLS To promote a strong, sustainable and high-skilled local economy	(7) URBAN REGENERATION & AREA RENEWAL To create world's leading life science district on the LCH site; promote Sutton Link and secure inward investment for area renewal	(8) GREEN ECONOMY DECENT ENERGY; & DECARBONISATION. To attract green business; promote 'circular' economy; promote decentralised energy & decarbonise social housing & buildings	(9) ACCESS TO HOUSING To meet the future local need for housing and affordable housing and the Borough's share of London's need	(10) SOCIAL AND COMMUNITY INFRASTRUCTURE To maintain and enhance good access to health, education, sports, leisure and other public amenities for Borough residents	(11) BUILT AND HISTORIC ENVIRONMENT To protect and enhance the quality of built design, townscape quality, local character and the Borough's historic environment	(12) EQUALITIES, & CLIMATE JUSTICE Avoid discrimination against equalities groups; promote climate justice, address deprivation; promote healthy & safe communities,

ISSUE 11: WANDLE VALLEY AREA STRATEGY- updates Policy 5 of Local Plan 2018

<p>New Housing (a) The Council will:</p> <ul style="list-style-type: none"> Work with developers to deliver new housing at Hackbridge Station. Consider appropriate redevelopment options for the land to the north of Hackbridge Station. <p>New Shops (b) The Council will:</p> <ul style="list-style-type: none"> Continue to promote Hackbridge as a District Centre. Protect shops across the Wandle Valley that serve the local residents with everyday goods. <p>New Employment (c) The Council will:</p> <ul style="list-style-type: none"> 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. 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). <p>New Infrastructure (d) The Council will:</p> <ul style="list-style-type: none"> Continue to deliver decentralised energy to new homes. Work with partners and landowners to create and improve foot and cycle routes across the area, notably to Mitcham Junction and towards Croydon from Hackbridge. Support the Wandle Valley Forum to lead on securing external funding for a replacement pedestrian bridge. <p>New Open Space (e) The Council will:</p> <ul style="list-style-type: none"> 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. 	<p>Better Transport (f) The Council will:</p> <ul style="list-style-type: none"> Improve signage across the Wandle Valley. Seek to improve pedestrian links between Mill Green and Poulter Park. Beddington Lane improvements will continue to be sought as part of any proposed planning applications. <p>Better Environment (g) The Council will:</p> <ul style="list-style-type: none"> Work with Thames Water to reduce the effects of Beddington Sewage Treatment works on the environment and local area. Continue to work with Transport for London to reduce the effects of air quality and encourage sustainable transport and to improve the quality of the public realm in Beddington Village. <p>Community Initiatives (h) The Council will:</p> <ul style="list-style-type: none"> Encourage community representatives to collaborate to fund local projects, in accordance with the Council's Neighbourhood Fund or local committee grants. Work with the Hackbridge and Beddington Corner Neighbourhood Development Group to support the delivery of projects in the adopted neighbourhood plan. <p>The River Wandle (i) The Council will:</p> <ul style="list-style-type: none"> 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"> Improve the water quality of the River, in particular lowering levels of phosphates and limiting sewage and road run off. Expand the network of walking and cycling routes including the Wandle Trail. Seek to improve the visual appearance and biodiversity value of the Beddington Carrier. Achieve good ecological potential for the River Wandle by 2027.
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DRAFT POLICY 11: Wandle Valley Area Strategy	+++	+++	++?	+++	+++	++	++	++	+++	++	+++	+++
LOCAL PLAN 2018: Policy 5	++	++	++?	++	++	+	+	++	++	++	++	++

<p>Draft Policy 11 'Wandle Valley Area Strategy' is predicted to have:</p> <p><u>Large beneficial effects (+++) on</u></p> <ul style="list-style-type: none"> addressing the causes of climate change by minimising CO₂ emissions and promoting zero carbon standards in new development (Appraisal Objective 1) avoiding, reducing and managing all sources of flood risk taking account of climate change (Appraisal Objective 2); protecting and enhancing the quality of Sutton's open environment, promoting urban greening (blue and green infrastructure), promoting ecological pathways and securing biodiversity net gain throughout the Borough (Appraisal Objective 3) reducing traffic levels, reducing congestion, cutting local air pollution, promoting active and sustainable modes of transport and promoting healthy streets (Appraisal Objective 4) enhancing the vitality and viability and regeneration of Sutton Town Centre and town centres and promoting access to community shopping facilities (Appraisal Objective 5); helping to meet the future local need for housing and the Borough's share of London's need (Appraisal Objective 9) protecting and enhancing the quality of built design, townscape quality, local character and the Borough's historic environment (Appraisal Objective 11) ensuring that the Local Plan does not discriminate against equalities target groups and promotes climate justice (Appraisal Objective 12) <p><u>Medium beneficial effects (++) on</u></p> <ul style="list-style-type: none"> promoting economic growth and a strong, sustainable and high-skilled local economy (Appraisal Objective 6); attracting green business and jobs to the Borough; promote the 'circular' economy (Appraisal Objective 8) 	<p>ANALYSIS</p> <p>The draft Wandle Valley Area Strategy under Policy Issue 12 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 significantly beneficial impacts by;</p> <ul style="list-style-type: none"> promoting zero carbon standards in new development by connecting new homes to decentralised energy networks (relevant to appraisal objective 1); 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); 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. However the de-designation of some MOL within Beddington Farmlands remains under consideration (?). (relevant to appraisal objective 3); 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 to appraisal objective 4); 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) (appraisal objective 6); helping to meet Borough wide needs for housing, affordable housing and family housing meeting housing 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.
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SA FRAMEWORK OBJECTIVES												
(A) Environmental Sustainability				(B) Sustainable Economic Growth				(C) Sustainable Communities				
+ Small beneficial impact ++ Medium beneficial impact +++ Large beneficial impact X Adverse Impact ? Uncertain impact None/ neutral	(1) CLIMATE MITIGATION AND NET ZERO To address causes of climate change by minimising CO ₂ emissions and promoting zero carbon in new development	(2) FLOOD RISK AND WATER RESOURCES To avoid, reduce and manage all sources of flood risk to and from development taking account of climate change	(3) OPEN SPACE, GREENING & BNG To enhance provision and quality of Sutton's open environment, promote greening & biodiversity linkages and promote BNG	(4) SUSTAINABLE TRANSPORT, HEALTHY STREETS AND AIR QUALITY To reduce traffic, reduce congestion, local air pollution, promote sustainable transport and healthy streets	(5) TOWN CENTRES To enhance the vitality and viability and regeneration of Sutton Town Centre and town centres throughout Borough and promote access to community shopping facilities.	(6) SUSTAINABLE ECONOMIC GROWTH, LOCAL EMPLOYMENT EDUCATION & SKILLS To promote a strong, sustainable and high-skilled local economy	(7) URBAN REGENERATION & AREA RENEWAL To create world's leading life science district on the LCH site; promote Sutton Link and secure inward investment for area renewal	(8) GREEN ECONOMY DECENT ENERGY; & DECARBONISATION. To attract green business; promote 'circular' economy; promote decentralised energy & de-carbonise social housing & buildings	(9) ACCESS TO HOUSING To meet the future local need for housing and affordable housing and the Borough's share of London's need	(10) SOCIAL AND COMMUNITY INFRASTRUCTURE To maintain and enhance good access to health, education, sports, leisure and other public amenities for Borough residents	(11) BUILT AND HISTORIC ENVIRONMENT To protect and enhance the quality of built design, townscape quality, local character and the Borough's historic environment	(12) EQUALITIES, & CLIMATE JUSTICE Avoid discrimination against equalities groups; promote climate justice, address deprivation; promote healthy & safe communities,
MEETING SUTTON'S HOUSING NEEDS												
ISSUE 12: STRATEGIC HOUSING REQUIREMENTS- updates Policy 1 of Local Plan 2018												
<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>												
DRAFT POLICY 12: Strategic Housing Needs			+	++					+++	++	++	+++
LOCAL PLAN 2018: Policy 1			+	++					++	++	++	++
Draft Policy 12 'Strategic Housing Needs' is predicted to have:							ANALYSIS					
<p><u>Large beneficial effects (+++) on</u></p> <ul style="list-style-type: none"> helping to meet the future local need for housing and the Borough's share of London's need (Appraisal Objective 9) ensuring that the Local Plan does not discriminate against equalities target groups and promotes climate justice (Appraisal Objective 12) 							<p>Draft Policy 12 'Strategic Housing Needs' is predicted to have significant beneficial impacts on meeting the future local need for housing by promoting the delivery of new housing, particularly self-contained housing, in appropriate locations across the borough, particularly within highly accessible locations the delivery of site allocations and appropriate windfall sites; and estate regeneration where feasible and delivering new housing on suitable small sites (below 0.25 ha where consistent with other Local Plan objectives and policies. Townscape quality and character will be protected and enhanced by ensuring that proposals for residential developments are of a high design quality ('design-led' approach) which take account of the character of the area and its ability to accommodate growth. 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 the site context in terms of connectivity and accessibility; and the capacity and quality of provision of surrounding infrastructure. Draft Policy 12 has significantly positive benefits for equalities issues by delivering affordable units and supporting development proposals which meet the needs of specific equalities target groups including those requiring affordable housing, family sized housing, older people, gypsy and travellers and people with disabilities.</p>					
<p><u>Medium beneficial effects (++) on</u></p> <ul style="list-style-type: none"> reducing traffic levels, reducing congestion, cutting local air pollution, promoting active and sustainable modes of transport and promoting healthy streets (Appraisal Objective 4) maintaining and enhancing good access to health, education, sports, leisure and other public amenities for Borough residents (Appraisal Objective 10) protecting and enhancing the quality of built design, townscape quality, local character and the Borough's historic environment (Appraisal Objective 11) 												
<p><u>Small beneficial effects (+) on</u></p> <ul style="list-style-type: none"> protecting and enhancing the quality of Sutton's open environment, promoting urban greening (blue and green infrastructure), promoting ecological pathways and securing biodiversity net gain throughout the Borough (Appraisal Objective 3) 												

	SA FRAMEWORK OBJECTIVES											
	(A) Environmental Sustainability				(B) Sustainable Economic Growth				(C) Sustainable Communities			
+ Small beneficial impact ++ Medium beneficial impact +++ Large beneficial impact X Adverse Impact ? Uncertain impact None/ neutral	(1) CLIMATE MITIGATION AND NET ZERO To address causes of climate change by minimising CO ₂ emissions and promoting zero carbon in new development	(2) FLOOD RISK AND WATER RESOURCES To avoid, reduce and manage all sources of flood risk to and from development taking account of climate change	(3) OPEN SPACE, GREENING & BNG To enhance provision and quality of Sutton's open environment, promote greening & biodiversity linkages and promote BNG	(4) SUSTAINABLE TRANSPORT, HEALTHY STREETS AND AIR QUALITY To reduce traffic, reduce congestion, local air pollution, promote sustainable transport and healthy streets	(5) TOWN CENTRES To enhance the vitality and viability and regeneration of Sutton Town Centre and town centres throughout Borough and promote access to community shopping facilities.	(6) SUSTAINABLE ECONOMIC GROWTH, LOCAL EMPLOYMENT EDUCATION & SKILLS To promote a strong, sustainable and high-skilled local economy	(7) URBAN REGENERATION & AREA RENEWAL To create world's leading life science district on the LCH site; promote Sutton Link and secure inward investment for area renewal	(8) GREEN ECONOMY DECENT ENERGY; & DECARBONISATION. To attract green business; promote 'circular' economy; promote decentralised energy & decarbonise social housing & buildings	(9) ACCESS TO HOUSING To meet the future local need for housing and affordable housing and the Borough's share of London's need	(10) SOCIAL AND COMMUNITY INFRASTRUCTURE To maintain and enhance good access to health, education, sports, leisure and other public amenities for Borough residents	(11) BUILT AND HISTORIC ENVIRONMENT To protect and enhance the quality of built design, townscape quality, local character and the Borough's historic environment	(12) EQUALITIES, & CLIMATE JUSTICE Avoid discrimination against equalities groups; promote climate justice, address deprivation; promote healthy & safe communities,

ISSUE 13: HOUSING DENSITY AND INTENSIFICATION - updates Policy 7 of Local Plan 2018

13.1. General Approach to Density

- (a) Development proposals should follow a design-led approach to optimising site density, demonstrating that it is appropriate to the site and the character of the surrounding area as detailed in the Council's Draft Character Study. This should have regard to areas identified as conserve, enhance and transform.
- (b) Whilst proposals should be design-led, the following options have been developed to give a broad spatial indication of level of density that is encouraged in different parts of the borough:

Option 1a - aligns with Spatial Strategy Option 1 'Sutton Town Centre' - Very High Density in Sutton Town Centre and its API. - Medium Density in the District Centres and their APIs. - Low Density in Suburban Heartlands.	Spatial Strategy Option 1b 'Sutton Town Centre and District Centre Network' - High density in Sutton Town Centre and its API. - High to medium density in District Centre and its API. - Lower density in Suburban Heartlands.	Option 1c - aligns with Spatial Strategy Option 3 'Dispersed Development' - High to medium density in Sutton Town Centre and its API. - Medium density in the District Centres and their APIs. - Medium to low density in Suburban Heartlands
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- (c) All development proposals should be of a high quality and close to sufficient infrastructure (existing or planned) to meet that development's needs.

OPTION 1A - aligns with Spatial Strategy Option A 'STC First'		+	++	++	++	+	++		X	+	++	+
OPTION 1B - aligns with Spatial Strategy Option B 'Sutton Town Centre and District Centre Network'		+	++?	+	+	++	++		++	++	+	++
OPTION 1C - aligns with Spatial Strategy Option C 'Dispersed Development'		X	X	X	X	X	++		+++	X	X	X

Option 1a: - aligns with Spatial Strategy Option A 'Sutton Town Centre - First' under Issue 2 and will have:
Medium beneficial effects (++) on

- protecting and enhancing the quality of Sutton's open environment, promoting urban greening (blue and green infrastructure), promoting ecological pathways and securing biodiversity net gain (Objective 3)
- reducing traffic levels, reducing congestion, cutting local air pollution, promoting active and sustainable modes of transport and promoting healthy streets (Appraisal Objective 4)
- enhancing the vitality and viability and regeneration of Sutton Town Centre and town centres and promoting access to community shopping facilities (Appraisal Objective 5);
- promoting area renewal, implementing environmental improvements, supporting the life sciences and attracting investment in infrastructure and high-skilled jobs (Appraisal Objective 7)
- protecting and enhancing the quality of built design, townscape quality, local character and the Borough's historic environment (Appraisal Objective 11)

Small beneficial effects (+) on

- avoiding, reducing and managing all sources of flood risk taking account of climate change (Appraisal Objective 2);
- promoting economic growth and a strong, sustainable and high-skilled local economy (Appraisal Objective 6);
- maintaining and enhancing good access to health, education, sports, leisure and other public amenities for Borough residents (Appraisal Objective 10)
- ensuring that the Local Plan does not discriminate against equalities target groups and promotes climate justice (Appraisal Objective 12)

Potentially negative beneficial effects (+) on

- helping to meet the future local need for housing and the Borough's share of London's need (Appraisal Objective 9)

Option 1b: - aligns with Spatial Strategy Option B 'Sutton Town Centre and District Centre Network' and will have
Medium beneficial effects (++) on

- protecting and enhancing the quality of Sutton's open environment, promoting urban greening (blue and green infrastructure), promoting ecological pathways and securing biodiversity net gain (Objective 3)
- promoting economic growth and a strong, sustainable and high-skilled local economy (Appraisal Objective 6);
- promoting area renewal, implementing environmental improvements, supporting the life sciences and attracting investment in infrastructure and high-skilled jobs (Appraisal Objective 7)
- helping to meet the future local need for housing and the Borough's share of London's need (Appraisal Objective 9)
- maintaining and enhancing good access to health, education, sports, leisure and other public amenities for Borough residents (Appraisal Objective 10)
- ensuring that the Local Plan does not discriminate against equalities target groups and promotes climate justice (Appraisal Objective 12)

Small beneficial effects (+) on

- avoiding, reducing and managing all sources of flood risk taking account of climate change (Appraisal Objective 2);
- reducing traffic levels, reducing congestion, cutting local air pollution, promoting active and sustainable modes of transport and promoting healthy streets (Appraisal Objective 4)
- enhancing the vitality and viability and regeneration of Sutton Town Centre and town centres and promoting access to community shopping facilities (Appraisal Objective 5);
- protecting and enhancing the quality of built design, townscape quality, local character and the Borough's historic environment (Appraisal Objective 11)

Option 1c aligns with Spatial Strategy Option 3 'Dispersed Development'
Large beneficial effects (+++) on

- helping to meet the future local need for housing and the Borough's share of London's need (Appraisal Objective 9)

Medium beneficial effects (++) on

- promoting the LCH and attracting investment in infrastructure and high-skilled jobs (Appraisal Objective 7)

Potentially negative beneficial effects (+) on

- avoiding, reducing and managing all sources of flood risk taking account of climate change (Appraisal Objective 2);
- protecting and enhancing the quality of Sutton's open environment, promoting urban greening (blue and green infrastructure), promoting ecological pathways and securing BNG (Appraisal Objective 3)
- reducing traffic levels, reducing congestion, cutting local air pollution, promoting active and sustainable modes of transport and promoting healthy streets (Appraisal Objective 4)
- enhancing the vitality and viability and regeneration of Sutton Town Centre and town centres and promoting access to community shopping facilities (Appraisal Objective 5);
- maintaining and enhancing good access to health, education, sports, leisure and other public amenities for Borough residents (Appraisal Objective 10)
- protecting and enhancing the quality of built design, townscape quality, local character and the Borough's historic environment (Appraisal Objective 11)
- ensuring that the Local Plan does not discriminate against equalities target groups and promotes climate justice (Appraisal Objective 12)

ANALYSIS - ISSUE 13 HOUSING DENSITY AND INTENSIFICATION
 While Sutton Town Centre and its surrounding API would still accommodate most of the borough's housing needs, **Option 1c** (aligned with Spatial Strategy Option C 'dispersed growth' under Issue 2) would also allow significant levels of new housing to be accommodated 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 and therefore go further towards meeting Sutton's capped housing needs figure (+++), Option 1c has a number of potentially negative impacts on key sustainability objectives. 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 probable 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 this option are reflected in the scores awarded in the appraisal matrix

In contrast, **Option 1a** (aligned with Spatial Strategy Option A '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. There would also be no need to designate additional industrial sites. On the other hand, a bigger concentration or expansion of taller buildings would be required within Sutton Town Centre in order to accommodate development and it would be more challenging to deliver family homes and address infrastructure requirements in Sutton Town Centre. The above advantages and disadvantages from a sustainability perspective are reflected in the scores awarded in the appraisal matrix

Option 1b (aligned with Spatial Strategy Option A 'Sutton Town Centre First' under Issue 2) **1B 'Sutton Town and District Centre Network'** (aligned with Spatial Strategy Option B under Issue 2 above) is very much 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.

SA FRAMEWORK OBJECTIVES												
(A) Environmental Sustainability				(B) Sustainable Economic Growth				(C) Sustainable Communities				
+ Small beneficial impact ++ Medium beneficial impact +++ Large beneficial impact X Adverse Impact ? Uncertain impact None/ neutral	(1) CLIMATE MITIGATION AND NET ZERO To address causes of climate change by minimising CO ₂ emissions and promoting zero carbon in new development	(2) FLOOD RISK AND WATER RESOURCES To avoid, reduce and manage all sources of flood risk to and from development taking account of climate change	(3) OPEN SPACE, GREENING & BNG To enhance provision and quality of Sutton's open environment, promote greening & biodiversity linkages and promote BNG	(4) SUSTAINABLE TRANSPORT, HEALTHY STREETS AND AIR QUALITY To reduce traffic, reduce congestion, local air pollution, promote sustainable transport and healthy streets	(5) TOWN CENTRES To enhance the vitality and viability and regeneration of Sutton Town Centre and town centres throughout Borough and promote access to community shopping facilities.	(6) SUSTAINABLE ECONOMIC GROWTH, LOCAL EMPLOYMENT EDUCATION & SKILLS To promote a strong, sustainable and high-skilled local economy	(7) URBAN REGENERATION & AREA RENEWAL To create world's leading life science district on the LCH site; promote Sutton Link and secure inward investment for area renewal	(8) GREEN ECONOMY DECENT ENERGY; & DECARBONISATION. To attract green business; promote 'circular' economy; promote decentralised energy & decarbonise social housing & buildings	(9) ACCESS TO HOUSING To meet the future local need for housing and affordable housing and the Borough's share of London's need	(10) SOCIAL AND COMMUNITY INFRASTRUCTURE To maintain and enhance good access to health, education, sports, leisure and other public amenities for Borough residents	(11) BUILT AND HISTORIC ENVIRONMENT To protect and enhance the quality of built design, townscape quality, local character and the Borough's historic environment	(12) EQUALITIES, & CLIMATE JUSTICE Avoid discrimination against equalities groups; promote climate justice, address deprivation; promote healthy & safe communities,

13.2. Coverage of Areas Of Potential Intensification

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

Option 2a - The London Plan Approach Intensification of housing should be directed to sites with existing or planned public transport access levels (PTALs) 3-6 or located within 800m distance of a station or town centre and district centre boundary.	OPTION 1b - Option 2b - A Local Approach Intensification of housing be directed to sites with existing or planned public transport access levels (PTALs) 4-6, located within 800m distance of Sutton Town Centre and 400m from a District Centre boundary
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OPTION 2a: London Plan Approach	X	X	X	X	X				+++	X	X	X
OPTION 2b: A Local Approach	+	+	+	+++	++				++	+++	+++	++

OPTION 2a - The London Plan Approach to the coverage of areas of potential intensification (APIs) would have:

Large beneficial effects (++) on

- helping to meet the future local need for housing and the Borough's share of London's need (Appraisal Objective 9)

Potentially negative effects (x?) on

- addressing the causes of climate change by minimising CO₂ emissions and promoting zero carbon standards in new development (Appraisal Objective 1)
- avoiding, reducing and managing all sources of flood risk taking account of climate change (Appraisal Objective 2);
- protecting and enhancing the quality of Sutton's open environment, promoting urban greening (blue and green infrastructure), promoting ecological pathways and securing biodiversity net gain throughout the Borough (Appraisal Objective 3)
- reducing traffic levels, reducing congestion, cutting local air pollution, promoting active and sustainable modes of transport and promoting healthy streets (Appraisal Objective 4)
- enhancing the vitality and viability and regeneration of Sutton Town Centre and town centres and promoting access to community shopping facilities (Appraisal Objective 5);
- helping to meet the future local need for housing and the Borough's share of London's need (Appraisal Objective 9)
- maintaining and enhancing good access to health, education, sports, leisure and other public amenities for Borough residents (Appraisal Objective 10)
- protecting and enhancing the quality of built design, townscape quality, local character and the Borough's historic environment (Appraisal Objective 11)

OPTION 2b - By comparison with Option 2a, a Local Plan Approach to the coverage of areas of potential intensification (APIs) would have:

Large beneficial effects (x?) on

- reducing traffic levels, reducing congestion, cutting local air pollution, promoting active and sustainable modes of transport and promoting healthy streets (Appraisal Objective 4)
- maintaining and enhancing good access to health, education, sports, leisure and other public amenities for Borough residents (Appraisal Objective 10)
- protecting and enhancing the quality of built design, townscape quality, local character and the Borough's historic environment (Appraisal Objective 11)

Medium beneficial effects (++) on

- enhancing the vitality and viability and regeneration of Sutton Town Centre and town centres and promoting access to community shopping facilities (Appraisal Objective 5);
- helping to meet the future local need for housing and the Borough's share of London's need (Appraisal Objective 9)
- ensuring that the Local Plan does not discriminate against equalities target groups and promotes climate justice (Appraisal Objective 12)

Small beneficial effects (+) on

- addressing the causes of climate change by minimising CO₂ emissions and promoting zero carbon standards in new development (Appraisal Objective 1)
- avoiding, reducing and managing all sources of flood risk taking account of climate change (Appraisal Objective 2);
- protecting and enhancing the quality of Sutton's open environment, promoting urban greening (blue and green infrastructure), promoting ecological pathways and securing biodiversity net gain throughout the Borough (Appraisal Objective 3)

ANALYSIS

While the London Plan approach to identifying APIs (Option 2a) would be expected increase the delivery of housing by extending APIs around Sutton Town Centre and the Borough's seven district 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. Since this option would effectively enable and promote higher housing densities across much of the Borough there are likely to be a number of negative sustainability impacts including in terms of sustainable transport objectives, congestion and local air quality (Appraisal Objective 4), the vitality and viability of town centres (Appraisal Objective 5), maintaining good access to social and community infrastructure (Appraisal Objective 10) and the quality of built design and townscape and impacts on local character (Appraisal Objective 10). There may also be negative implications in terms of building more units in flood risk areas and increased pressure on greenfield sites, urban greening, BNG and open space etc.

By comparison, the Local approach to identifying APIs (Option 2a) is considered to be a more sustainable policy option. Since higher housing densities would be focused within areas with the higher PTAL score and in relatively close proximity to town centre boundaries, shopping and community facilities. The scores in the appraisal matrix indicate that while overall housing delivery might be lower under Option 2a as a consequence of having a reduced coverage of APIs across the Borough (where higher housing densities would be promoted), there are considered to be many beneficial impacts in terms of sustainable transport, access to shopping and community facilities and protecting the quality of townscape and local character.

	SA FRAMEWORK OBJECTIVES											
	(A) Environmental Sustainability				(B) Sustainable Economic Growth				(C) Sustainable Communities			
+ Small beneficial impact ++ Medium beneficial impact +++ Large beneficial impact X Adverse Impact ? Uncertain impact None/ neutral	(1) CLIMATE MITIGATION AND NET ZERO To address causes of climate change by minimising CO ₂ emissions and promoting zero carbon in new development	(2) FLOOD RISK AND WATER RESOURCES To avoid, reduce and manage all sources of flood risk to and from development taking account of climate change	(3) OPEN SPACE, GREENING & BNG To enhance provision and quality of Sutton's open environment, promote greening & biodiversity linkages and promote BNG	(4) SUSTAINABLE TRANSPORT, HEALTHY STREETS AND AIR QUALITY To reduce traffic, reduce congestion, local air pollution, promote sustainable transport and healthy streets	(5) TOWN CENTRES To enhance the vitality and viability and regeneration of Sutton Town Centre and town centres throughout Borough and promote access to community shopping facilities.	(6) SUSTAINABLE ECONOMIC GROWTH, LOCAL EMPLOYMENT EDUCATION & SKILLS To promote a strong, sustainable and high-skilled local economy	(7) URBAN REGENERATION & AREA RENEWAL To create world's leading life science district on the LCH site; promote Sutton Link and secure inward investment for area renewal	(8) GREEN ECONOMY DECENT ENERGY; & DECARBONISATION. To attract green business; promote 'circular' economy; promote decentralised energy & decarbonise social housing & buildings	(9) ACCESS TO HOUSING To meet the future local need for housing and affordable housing and the Borough's share of London's need	(10) SOCIAL AND COMMUNITY INFRASTRUCTURE To maintain and enhance good access to health, education, sports, leisure and other public amenities for Borough residents	(11) BUILT AND HISTORIC ENVIRONMENT To protect and enhance the quality of built design, townscape quality, local character and the Borough's historic environment	(12) EQUALITIES, & CLIMATE JUSTICE Avoid discrimination against equalities groups; promote climate justice, address deprivation; promote healthy & safe communities,

ISSUE 15: SMALL SITES - new policy

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

DRAFT POLICY 15: Small Sites			+	++					++	+	+	++
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Draft Policy 15 on Small Sites will have:

Medium beneficial effects (++) on

- reducing traffic levels, reducing congestion, cutting local air pollution, promoting active and sustainable modes of transport and promoting healthy streets (Appraisal Objective 4)
- helping to meet the future local need for housing and the Borough's share of London's need (Appraisal Objective 9)
- ensuring that the Local Plan does not discriminate against equalities target groups (Appraisal Objective 12)

Small beneficial effects (+) on

- protecting and enhancing the quality of Sutton's open environment, promoting urban greening (blue and green infrastructure) (Appraisal Objective 3)
- maintaining and enhancing good access to health, education, sports, leisure and other public amenities for Borough residents (Appraisal Objective 10)
- protecting and enhancing the quality of built design, townscape quality, local character and the Borough's historic environment (Appraisal Objective 11)

ANALYSIS

Draft Local Plan Policy 15 on 'Small Sites' is a new policy aimed at meet the requirements of London Plan Policy H2. Its main sustainability 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. Proposals for the development of small sites must adopt a design-led approach that optimises levels of residential density in accordance with London Plan Policy D6 and this will help to maintain and enhance townscape quality and local character.

ISSUE 16: HOUSING MIX AND HOUSING STANDARDS - updates Policy 9 of Local Plan 2018

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.

Dwelling Sizes Option 1

(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%.

Dwellings Sizes Option 2

(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.

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%

(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.

OPTION 1			++						+++	+	++	++
OPTION 2			++						++	+	+	+

Draft Policy 16 on Housing Mix and Housing Standards incorporating Dwelling Sizes Option 1 will have:

Medium beneficial effects (++) on

- reducing traffic levels, reducing congestion, cutting local air pollution, promoting active and sustainable modes of transport (Appraisal Objective 4)
- helping to meet the future local need for housing and the Borough's share of London's need (Appraisal Objective 9)
- ensuring that the Local Plan does not discriminate against equalities target groups through promoting mixed and balanced communities (Appraisal Objective 12)

ANALYSIS

The outcome of the appraisal indicates that draft Policy 16 on Housing Mix and Housing Standards will have beneficial sustainability impacts in terms of enhancing access to housing and family housing in particular while at the same time promoting mixed and balanced communities in appropriate locations. Overall, the draft policy will ensure that residential developments will provide an adequate amount of play space and informal recreation space on site which is calculated according to The Mayor's Housing Design Standards. The indicative housing mix proportions set out under Option 2 (Table 16.2) are based on local evidence gathered via the Borough Strategic Housing Market and Local Housing Need Assessment' (LHNA) and also have regard to the mix of tenures. Option 2 therefore considered to be more likely to deliver mixed and balanced communities in sustainable locations. Option 2 will and ensure that the relative proportion of family housing units (3 or 4 bedrooms) is higher within areas of poor public transport accessibility

Draft Policy 16 on Housing Mix and Housing Standards incorporating Dwelling Sizes Option 2 will have:

Medium beneficial effects (++) on

- reducing traffic levels, reducing congestion, cutting local air pollution, promoting active and sustainable modes of transport (Appraisal Objective 4)
- helping to meet the future local need for housing and the Borough's share of London's need (Appraisal Objective 9)
- ensuring that the Local Plan does not discriminate against equalities target groups and promotes climate justice (Appraisal Objective 12)

SA FRAMEWORK OBJECTIVES												
(A) Environmental Sustainability				(B) Sustainable Economic Growth				(C) Sustainable Communities				
	(1) CLIMATE MITIGATION AND NET ZERO To address causes of climate change by minimising CO ₂ emissions and promoting zero carbon in new development	(2) FLOOD RISK AND WATER RESOURCES To avoid, reduce and manage all sources of flood risk to and from development taking account of climate change	(3) OPEN SPACE, GREENING & BNG To enhance provision and quality of Sutton's open environment, promote greening & biodiversity linkages and promote BNG	(4) SUSTAINABLE TRANSPORT, HEALTHY STREETS AND AIR QUALITY To reduce traffic, reduce congestion, local air pollution, promote sustainable transport and healthy streets	(5) TOWN CENTRES To enhance the vitality and viability and regeneration of Sutton Town Centre and town centres throughout Borough and promote access to community shopping facilities.	(6) SUSTAINABLE ECONOMIC GROWTH, LOCAL EMPLOYMENT & EDUCATION & SKILLS To promote a strong, sustainable and high-skilled local economy	(7) URBAN REGENERATION & AREA RENEWAL To create world's leading life science district on the LCH site; promote Sutton Link and secure inward investment for area renewal	(8) GREEN ECONOMY DECENT ENERGY; & DECARBONISATION. To attract green business; promote 'circular' economy; promote decentralised energy & decarbonise social housing & buildings	(9) ACCESS TO HOUSING To meet the future local need for housing and affordable housing and the Borough's share of London's need	(10) SOCIAL AND COMMUNITY INFRASTRUCTURE To maintain and enhance good access to health, education, sports, leisure and other public amenities for Borough residents	(11) BUILT AND HISTORIC ENVIRONMENT To protect and enhance the quality of built design, townscape quality, local character and the Borough's historic environment	(12) EQUALITIES, & CLIMATE JUSTICE Avoid discrimination against equalities groups; promote climate justice, address deprivation; promote healthy & safe communities,
+ Small beneficial impact ++ Medium beneficial impact +++ Large beneficial impact X Adverse Impact ? Uncertain impact None/ neutral												
ISSUE 17: LOSS OF HOUSING AND CONVERSIONS - updates Policy 10 of Local Plan 2018												
Loss of Housing (a) The Council will resist the loss of existing self-contained housing. A loss may only be acceptable where (i) The loss is part of an application which results in better-designed, higher-quality new housing and does not result in a net loss of family sized homes (as originally built); or (ii) The proposal involves combining two dwellings that each have fewer than 3 bedrooms in order to create family-sized dwelling; or (iii) The loss will result in the provision of an essential community facility, where a specific need has been identified and the facility cannot be provided on another site nearby. (b) Planning applications that propose the loss of existing affordable housing, including estate regeneration schemes, will be assessed against the requirements of Policy H8 of the London Plan.												
Conversions (c) The Council will only grant planning permission for development involving the conversion of existing dwellings to provide new self-contained housing units, provided that (i) The proposal is within one of the Areas of Potential Intensification (ii) The Gross Internal Area of the dwelling considered for conversion must be at least 130m ² (excluding extensions, garages and loft space) (iii) The conversion of any dwelling with more than 130m ² 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												
DRAFT POLICY 17: Loss Of Housing And Conversions				+					++	+	++	+
LOCAL PLAN 2018: Policy 10				+					+	+	++	+
Draft Policy 17 on Loss of Housing and Conversions will have: Medium beneficial effects (+++) on							ANALYSIS Draft Local Plan Policy 17 'Loss of Housing and Conversions' now provides stronger protection against the loss of family homes compared to the current Local Plan 2018 by requiring that proposed conversions of family sized homes into flats must provide a least 1 family sized unit. Otherwise, this policy is largely unchanged. The appraisal indicates that Draft Policy 17 will have significant benefits in terms of meeting local housing needs (by preventing its loss to other uses) and maintaining townscape quality & character which could otherwise be affected by change of use or conversion of residential units. Under this policy, 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.					
<ul style="list-style-type: none"> helping to meet the future local need for housing and the Borough's share of London's need (Appraisal Objective 9) protecting and enhancing the quality of built design, townscape quality, local character and the Borough's historic environment (Appraisal Objective 11) 												
Smaller beneficial effects (+) on												
<ul style="list-style-type: none"> reducing traffic levels, reducing congestion, cutting local air pollution, promoting active and sustainable modes of transport and promoting healthy streets (Appraisal Objective 4) ensuring that the Local Plan does not discriminate against equalities target groups and promotes climate justice (Appraisal Objective 12) 												
ISSUE 18: BUILD TO RENT - new policy												
(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												
DRAFT POLICY 18: Build To Rent									++			++
Draft Policy 18 on Build to Rent will have: Medium beneficial effects (++) on							ANALYSIS Draft Local Plan Policy 19 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, creating mixed and balanced communities and for equalities.					
<ul style="list-style-type: none"> helping to meet the future local need for housing and the Borough's share of London's need (Appraisal Objective 9) ensuring that the Local Plan does not discriminate against equalities target groups and promotes climate justice (Appraisal Objective 12) 												

SA FRAMEWORK OBJECTIVES												
(A) Environmental Sustainability				(B) Sustainable Economic Growth				(C) Sustainable Communities				
	(1) CLIMATE MITIGATION AND NET ZERO To address causes of climate change by minimising CO ₂ emissions and promoting zero carbon in new development	(2) FLOOD RISK AND WATER RESOURCES To avoid, reduce and manage all sources of flood risk to and from development taking account of climate change	(3) OPEN SPACE, GREENING & BNG To enhance provision and quality of Sutton's open environment, promote greening & biodiversity linkages and promote BNG	(4) SUSTAINABLE TRANSPORT, HEALTHY STREETS AND AIR QUALITY To reduce traffic, reduce congestion, local air pollution, promote sustainable transport and healthy streets	(5) TOWN CENTRES To enhance the vitality and viability and regeneration of Sutton Town Centre and town centres throughout Borough and promote access to community shopping facilities.	(6) SUSTAINABLE ECONOMIC GROWTH, LOCAL EMPLOYMENT EDUCATION & SKILLS To promote a strong, sustainable and high-skilled local economy	(7) URBAN REGENERATION & AREA RENEWAL To create world's leading life science district on the LCH site; promote Sutton Link and secure inward investment for area renewal	(8) GREEN ECONOMY DECENT ENERGY; & DECARBONISATION. To attract green business; promote 'circular' economy; promote decentralised energy & decarbonise social housing & buildings	(9) ACCESS TO HOUSING To meet the future local need for housing and affordable housing and the Borough's share of London's need	(10) SOCIAL AND COMMUNITY INFRASTRUCTURE To maintain and enhance good access to health, education, sports, leisure and other public amenities for Borough residents	(11) BUILT AND HISTORIC ENVIRONMENT To protect and enhance the quality of built design, townscape quality, local character and the Borough's historic environment	(12) EQUALITIES, & CLIMATE JUSTICE Avoid discrimination against equalities groups; promote climate justice, address deprivation; promote healthy & safe communities,
+ Small beneficial impact ++ Medium beneficial impact +++ Large beneficial impact X Adverse Impact ? Uncertain impact None/ neutral												
ISSUE 19: CO-LIVING HOUSING - new policy												
Option 1 - A Local Approach to Co-Living Developments												
(a) Development proposals for co-living housing will only be supported where it can be demonstrated that: (i) It is not proposed on a site that is suitable for residential accommodation under Use Class C3, having regard to: (1) whether a proposal would displace existing C3 residential accommodation (2) whether a site has been identified in the Local Plan housing trajectory and/or Housing and Economic Land Availability Assessment as having capacity for C3 housing (3) whether the site is allocated for C3 residential use in the development plan; and (4) whether a site has an extant planning permission for C3 housing. (ii) there is a genuine need and demand for co-living housing in the borough; (iii) co-living housing is better suited to meeting the local housing needs than conventional housing; (iv) it would not result in an overconcentration of single-person accommodation, would not be detrimental to neighbours' residential amenity and would not be detrimental to the mix and balance of communities and uses in the area; and (v) it is located in Sutton Town Centre, as defined on the policies map (b) Where the criteria for housing can be met, in line with Part (a)(i to v) above, development proposals must (i) meet the requirements of London Plan Policy H16 'Large-scale purpose-built shared living'; and (ii) submit an appropriately detailed and resourced management plan to demonstrate that the scheme will be managed and maintained over its life to ensure acceptable levels of residential amenity for occupants and neighbouring residents; and (iii) be under single management. (c) Development proposals for housing must contribute towards the delivery of affordable housing. Specifically, proposals must (i) deliver a minimum of percentage of affordable homes on-site under Use Class C3, at Sutton's required affordable housing threshold (to be defined at the Regulation 19 stage), tenure and size mix; or (ii) provide a financial contribution secured by legal agreement that is equivalent to Sutton's affordable housing threshold (to be defined at the Regulation 19 stage) under Use Class C3, at Sutton's required tenure and size mix'												
Option 2 - the London Plan Approach to Co-Living Development												
(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'												
OPTION 1: Local Approach				+					++		++	++
OPTION 2: London Plan Approach									+		+	+
Draft Policy 19 on Co-Living Housing Option 1 (Local Approach) will have:							ANALYSIS					
Medium beneficial effects (++) on <ul style="list-style-type: none"> helping to meet the future local need for housing and the Borough's share of London's need (Appraisal Objective 9) protecting and enhancing the quality of built design, townscape quality, local character and the Borough's historic environment (Appraisal Objective 11) ensuring that the Local Plan does not discriminate against equalities target groups and promotes climate justice (Appraisal Objective 12) Small beneficial effects (+) on <ul style="list-style-type: none"> reducing traffic levels, reducing congestion, cutting local air pollution, promoting active and sustainable modes of transport (Appraisal Objective 4) 							The Local Approach to Co-Living Developments proposed under Option 1 of Draft Policy 19 is considered to have greater sustainability benefits than the London Plan approach set out under Option 2. Option 1 is much more restrictive on Co-Living developments than the current Local Plan and will ensure that co-living developments which are permitted contribute towards affordable housing provision, are developed 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 in the scores awarded in the appraisal matrix.					
Draft Policy 19 on Co-Living Housing Option 2 (London Plan approach) will have:												
Small beneficial effects (++) on <ul style="list-style-type: none"> helping to meet the future local need for housing and the Borough's share of London's need (Appraisal Objective 9) protecting and enhancing the quality of built design, townscape quality, local character and the Borough's historic environment (Appraisal Objective 11) ensuring that the Local Plan does not discriminate against equalities target groups and promotes climate justice (Appraisal Objective 12) 												
Issue 20: HOUSES IN MULTIPLE OCCUPATION - new policy												
(a) Proposals for new houses in multiple occupation (HMO), and extensions to existing HMOs that result in an increase of residents, will be permitted, provided that the proposal (i) does not result in the loss of larger family sized housing (houses with 3 bedrooms or more) (ii) is within one of the Areas of Potential Intensification (iii) does not lead to a concentration of HMOs in the vicinity where the cumulative effect of the HMOs harms the character of the area. Concentration which harms the area will be considered as where more than 20% of dwellings 100 metres either side of the proposal site are HMOs (iv) has no adverse impact on the amenity of neighbouring properties, including as a result of cumulative impacts (v) does not detract from the character and appearance of the area, particularly when proposed in Conservation Areas and Areas of Special Local Character (vi) meets the minimum room sizes set out in the Licensing of Houses in Multiple Occupation (Mandatory Conditions of Licences) (England) Regulations 2018 or any successor regulations (vii) does not adversely affect on-street parking. (b) Proposals for the loss of an HMO will be supported where (i) it results in the creation of family sized dwellings, unless it can be demonstrated that family sized dwellings would be unviable or inappropriate to the location (ii) it results in a reduction in concentration of HMO's in an area where there is evidence of existing harm to the amenity of neighbouring properties												
DRAFT POLICY 20: HOUSES IN MULTIPLE OCCUPATION				++					++		++	++
LOCAL PLAN 2018				+					+		+	+
Draft Policy 20 on Houses in Multiple Occupation will have:							ANALYSIS					
Medium beneficial effects (++) on <ul style="list-style-type: none"> reducing traffic levels, reducing congestion, cutting local air pollution, promoting active and sustainable modes of transport and promoting healthy streets (Appraisal Objective 4) helping to meet the future local need for housing and the Borough's share of London's need (Appraisal Objective 9) protecting and enhancing the quality of built design, townscape quality, local character and the Borough's historic environment (Appraisal Objective 11) ensuring that the Local Plan does not discriminate against equalities target groups and promotes climate justice (Appraisal Objective 12) 							By directing Houses in Multiple Occupation' (HMOs) towards town and district centre locations and resisting the loss of family homes, Policy 20 is considered to have a range of sustainability benefits in terms of ensuring that such developments are only granted within sustainable locations with good access to shopping facilities and public transport (i.e. within an API); do not harm local amenity; do not harm the character of the area or the historic environment, and do not lead to the loss of family housing. This is reflected in the scores awarded in the appraisal matrix. This policy is expected to be more effective from February 2025 when a Article 4 Direction is planned to be introduced (this preventing HMOs being created through Permitted Development Rights).					

	SA FRAMEWORK OBJECTIVES											
	(A) Environmental Sustainability				(B) Sustainable Economic Growth				(C) Sustainable Communities			
+ Small beneficial impact ++ Medium beneficial impact +++ Large beneficial impact X Adverse Impact ? Uncertain impact None/ neutral	(1) CLIMATE MITIGATION AND NET ZERO To address causes of climate change by minimising CO ₂ emissions and promoting zero carbon in new development	(2) FLOOD RISK AND WATER RESOURCES To avoid, reduce and manage all sources of flood risk to and from development taking account of climate change	(3) OPEN SPACE, GREENING & BNG To enhance provision and quality of Sutton's open environment, promote greening & biodiversity linkages and promote BNG	(4) SUSTAINABLE TRANSPORT, HEALTHY STREETS AND AIR QUALITY To reduce traffic, reduce congestion, local air pollution, promote sustainable transport and healthy streets	(5) TOWN CENTRES To enhance the vitality and viability and regeneration of Sutton Town Centre and town centres throughout Borough and promote access to community shopping facilities.	(6) SUSTAINABLE ECONOMIC GROWTH, LOCAL EMPLOYMENT EDUCATION & SKILLS To promote a strong, sustainable and high-skilled local economy	(7) URBAN REGENERATION & AREA RENEWAL To create world's leading life science district on the LCH site; promote Sutton Link and secure inward investment for area renewal	(8) GREEN ECONOMY DECENT ENERGY; & DECARBONISATION. To attract green business; promote 'circular' economy; promote decentralised energy & decarbonise social housing & buildings	(9) ACCESS TO HOUSING To meet the future local need for housing and affordable housing and the Borough's share of London's need	(10) SOCIAL AND COMMUNITY INFRASTRUCTURE To maintain and enhance good access to health, education, sports, leisure and other public amenities for Borough residents	(11) BUILT AND HISTORIC ENVIRONMENT To protect and enhance the quality of built design, townscape quality, local character and the Borough's historic environment	(12) EQUALITIES, & CLIMATE JUSTICE Avoid discrimination against equalities groups; promote climate justice, address deprivation; promote healthy & safe communities,
ISSUE 21: OLDER PERSONS AND SPECIALIST ACCOMMODATION- updates Policy 11 of Local Plan 2018												
<p>(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).</p> <p>(b) Existing specialist and supported housing will be protected where it is considered suitable for its use and meets relevant quality standards.</p> <p>(c) Redevelopment of any existing site that includes specialist and supported housing will only be considered acceptable where:</p> <p>(i) there is no longer an identified need for its retention in its current format;</p> <p>(ii) any loss of accommodation is re-provided elsewhere in the borough, resulting in no net loss; and</p> <p>(iii) new accommodation meets the criteria set out in Part (a) above.</p> <p>(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.</p>												
DRAFT POLICY 21: Older Persons and Specialist Accommodation				+					++	+	+	+++
LOCAL PLAN 2018: Policy 11				+					++	+	+	++
Draft Policy 21 on Older Persons and Specialist Accommodation will have:							ANALYSIS					
<p><u>Medium beneficial effects (++) on</u></p> <ul style="list-style-type: none"> helping to meet the future local need for housing and the Borough's share of London's need (Appraisal Objective 9) maintaining and enhancing good access to health, education, sports, leisure and other public amenities for Borough residents (Appraisal Objective 10) protecting and enhancing the quality of built design, townscape quality, local character and the Borough's historic environment (Appraisal Objective 11) ensuring that the Local Plan does not discriminate against equalities target groups and promotes climate justice (Appraisal Objective 12) 							<p>Draft Policy 21 on Older Persons and Specialist Accommodation has a number of positive sustainability 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). These predicted benefits are reflected in the scores awarded in the above appraisal matrix. While local evidence identifies a need for additional older persons accommodation, this draft policy carries forward the requirement on developers to demonstrate need in the first instance.</p>					
ISSUE 22: GYPSY AND TRAVELLER ACCOMMODATION - updates Policy 12 of Local Plan 2018												
<p>(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.</p> <p>(b) The Council is considering additional Gypsy and Traveller accommodation, as set out in the Potential Sites Allocations;</p> <p>(c) Planning permission for further Gypsy and Traveller sites will only be permitted when a site satisfies the following criteria (i) The site has safe access to and from the road network, and it has adequate provision for parking, turning, servicing and emergency vehicle access. (ii) The application will not have an unduly adverse impact on the local environment, the character of the area and the amenities of both local residents and the future occupiers of the site, including the potential for noise pollution, air pollution or traffic movements and other activities likely to be taking place within or in the vicinity of the site. (iii) The site is situated within a reasonable distance of local shops, services and community facilities, in particular schools and health services, and is accessible by public transport. (iv) The site is not located in an area at high risk of flooding. (v) The layout of the site, its associated facilities and landscaping will be designed to a high standard including pitches, hardstandings, amenity blocks, amenity and play spaces and boundary treatments.</p>												
DRAFT POLICY 22: Gypsy and Traveller Accommodation		+	++	++						++	+	+++
LOCAL PLAN 2018: Policy 12		+	++	++						++	+	+++
Draft Policy 22 on Gypsy and Traveller Accommodation will have:							ANALYSIS					
<p><u>Large beneficial effects (++) on</u></p> <ul style="list-style-type: none"> ensuring that the Local Plan does not discriminate against equalities target groups (Appraisal Objective 12) <p><u>Medium beneficial effects (++) on</u></p> <ul style="list-style-type: none"> protecting and enhancing the quality of Sutton's open environment, promoting urban greening (blue and green infrastructure), promoting ecological pathways and securing biodiversity net gain throughout the Borough (Appraisal Objective 3) reducing traffic levels, reducing congestion, cutting local air pollution, promoting active and sustainable modes of transport and promoting healthy streets (Appraisal Objective 4) maintaining and enhancing good access to health, education, sports, leisure and other public amenities for Borough residents (Appraisal Objective 10) <p><u>Small beneficial effects (++) on</u></p> <ul style="list-style-type: none"> avoiding, reducing and managing all sources of flood risk taking account of climate change (Appraisal Objective 2) ; protecting and enhancing the quality of built design, townscape quality, local character and the Borough's historic environment (Appraisal Objective 11) 							<p>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 sustainability 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 from draft Policy 22 and the corresponding site allocation 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. There are other benefits for protecting local character and residential amenity, ensuring reasonable access to local shops, services and community facilities, in particular schools and health services, and is accessible by public transport; avoiding areas at high risk of flooding and ensuring that the layout and landscaping of gypsy and traveller sites (including and boundary treatments) are designed to a high standard</p>					

	SA FRAMEWORK OBJECTIVES											
	(A) Environmental Sustainability			(B) Sustainable Economic Growth					(C) Sustainable Communities			
+ Small beneficial impact ++ Medium beneficial impact +++ Large beneficial impact X Adverse Impact ? Uncertain impact None/ neutral	(1) CLIMATE MITIGATION AND NET ZERO To address causes of climate change by minimising CO ₂ emissions and promoting zero carbon in new development	(2) FLOOD RISK AND WATER RESOURCES To avoid, reduce and manage all sources of flood risk to and from development taking account of climate change	(3) OPEN SPACE, GREENING & BNG To enhance provision and quality of Sutton's open environment, promote greening & biodiversity linkages and promote BNG	(4) SUSTAINABLE TRANSPORT, HEALTHY STREETS AND AIR QUALITY To reduce traffic, reduce congestion, local air pollution, promote sustainable transport and healthy streets	(5) TOWN CENTRES To enhance the vitality and viability and regeneration of Sutton Town Centre and town centres throughout Borough and promote access to community shopping facilities.	(6) SUSTAINABLE ECONOMIC GROWTH, LOCAL EMPLOYMENT EDUCATION & SKILLS To promote a strong, sustainable and high-skilled local economy	(7) URBAN REGENERATION & AREA RENEWAL To create world's leading life science district on the LCH site; promote Sutton Link and secure inward investment for area renewal	(8) GREEN ECONOMY DECENT ENERGY; & DECARBONISATION. To attract green business; promote 'circular' economy; promote decentralised energy & de-carbonise social housing & buildings	(9) ACCESS TO HOUSING To meet the future local need for housing and affordable housing and the Borough's share of London's need	(10) SOCIAL AND COMMUNITY INFRASTRUCTURE To maintain and enhance good access to health, education, sports, leisure and other public amenities for Borough residents	(11) BUILT AND HISTORIC ENVIRONMENT To protect and enhance the quality of built design, townscape quality, local character and the Borough's historic environment	(12) EQUALITIES, & CLIMATE JUSTICE Avoid discrimination against equalities groups; promote climate justice, address deprivation; promote healthy & safe communities,

ISSUE 23: HOUSING AND GARDEN LAND - updates Policy 13 of Local Plan 2018

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

Front Garden Land
(b) The Council will seek the retention of established boundary treatments, such as front garden walls, to maintain the suburban character and appearance of the borough.
(c) Where the paving of all or part of a front garden is sought (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

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

DRAFT POLICY 23: Housing and Garden Land		++	++	+							++	+
LOCAL PLAN 2018: Policy 13		++	++	+							++	+

Draft Policy 23 on Housing and Garden Land will have:

Large beneficial effects (+++) on

- avoiding, reducing and managing all sources of flood risk taking account of climate change (Appraisal Objective 2);
- protecting and enhancing the quality of Sutton's open environment, promoting urban greening (blue and green infrastructure), promoting ecological pathways and securing biodiversity net gain throughout the Borough (Appraisal Objective 3)
- protecting and enhancing the quality of built design, townscape quality, local character and the Borough's historic environment (Appraisal Objective 11)

Medium beneficial effects (++) on

- reducing traffic levels, reducing congestion, cutting local air pollution, promoting active and sustainable modes of transport and promoting healthy streets (Appraisal Objective 4)
- ensuring that the Local Plan does not discriminate against equalities target groups and promotes climate justice (Appraisal Objective 12)

ANALYSIS
The outcome of the appraisal shows that Draft Policy 23 on Housing and Garden Land will deliver a number of positive sustainability benefits as shown in the appraisal matrix. These beneficial effects will arise from providing policy protection for backgarden sites where they make an important contribution to local character and residential amenity; by protecting and encouraging the creation soft landscaping and/or vegetation; maintaining local ecological pathways within residential areas; facilitating urban greening and biodiversity net gain (BNG) and helping to minimise flood risk.

GROWING SUTTON'S EMPLOYMENT OFFER

ISSUE 24: EMPLOYMENT LAND AND WASTE MANAGEMENT - updates Policy 14 of Local Plan 2018

	Industrial Option 1: Conventional Intensification	Industrial Option 2: Multi-storey Intensification	Industrial Option 3: Intensification and New Sites
	<ul style="list-style-type: none"> Continue to protect existing designated SIL and EILs. Support the intensification of existing sites to provide additional industrial floorspace and make more efficient use of limited employment land. Options for preferred plot ratios are: <ul style="list-style-type: none"> 40% (current local plan standard) 65% (London Plan standard) 100% ELENA consideration Develop former waste sites that have been released from waste safeguarding for industrial uses. Refuse applications which would result in further employment land losses. Not supporting co-location schemes in SILs. Continue DtC with neighbouring boroughs, particularly Croydon. 	<ul style="list-style-type: none"> Continue to protect existing designated SIL and EILs. Pro-active policy to support multi-storey intensification as a means of delivering additional industrial floorspace within existing sites. Policy approach could require developers to justify why this form of development is unsuitable and/or unviable to deliver to try and make the most efficient use of land. Develop former waste sites that have been released from waste safeguarding for multi-storey industrial uses. Refuse applications which would result in further employment land losses. Not supporting co-location schemes in SILs Continue DtC with neighbouring boroughs, particularly Croydon. 	<ul style="list-style-type: none"> Continue to protect existing designated SIL and EILs. Proactively support intensification of existing sites to help meet industrial need. De-designate MOL at land to the west of Beddington Lane (2.04ha) and land at Jessops Way (2.09ha) and allocate for industrial uses. Continue to explore the possibility of expanding the Kimpton SIL into the adjacent supermarket site. Develop former waste sites that have been released from waste safeguarding for multi-storey industrial uses. Refuse applications which would result in further employment land losses. Not supporting co-location schemes in SILs Continue DtC with neighbouring boroughs, particularly Croydon.

SA FRAMEWORK OBJECTIVES												
	(A) Environmental Sustainability				(B) Sustainable Economic Growth				(C) Sustainable Communities			
	(1) CLIMATE MITIGATION AND NET ZERO To address causes of climate change by minimising CO ₂ emissions and promoting zero carbon in new development	(2) FLOOD RISK AND WATER RESOURCES To avoid, reduce and manage all sources of flood risk to and from development taking account of climate change	(3) OPEN SPACE, GREENING & BNG To enhance provision and quality of Sutton's open environment, promote greening & biodiversity linkages and promote BNG	(4) SUSTAINABLE TRANSPORT, HEALTHY STREETS AND AIR QUALITY To reduce traffic, reduce congestion, local air pollution, promote sustainable transport and healthy streets	(5) TOWN CENTRES To enhance the vitality and viability and regeneration of Sutton Town Centre and town centres throughout Borough and promote access to community shopping facilities.	(6) SUSTAINABLE ECONOMIC GROWTH, LOCAL EMPLOYMENT EDUCATION & SKILLS To promote a strong, sustainable and high-skilled local economy	(7) URBAN REGENERATION & AREA RENEWAL To create world's leading life science district on the LCH site; promote Sutton Link and secure inward investment for area renewal	(8) GREEN ECONOMY DECENT ENERGY; & DECARBONISATION. To attract green business; promote 'circular' economy; promote decentralised energy & decarbonise social housing & buildings	(9) ACCESS TO HOUSING To meet the future local need for housing and affordable housing and the Borough's share of London's need	(10) SOCIAL AND COMMUNITY INFRASTRUCTURE To maintain and enhance good access to health, education, sports, leisure and other public amenities for Borough residents	(11) BUILT AND HISTORIC ENVIRONMENT To protect and enhance the quality of built design, townscape quality, local character and the Borough's historic environment	(12) EQUALITIES, & CLIMATE JUSTICE Avoid discrimination against equalities groups; promote climate justice, address deprivation; promote healthy & safe communities,
+ Small beneficial impact ++ Medium beneficial impact +++ Large beneficial impact X Adverse Impact ? Uncertain impact None/ neutral												
INDUSTRIAL OPTION 1: Conventional Intensification				+		+						
INDUSTRIAL OPTION 2: Multi-Storey Intensification				x?		++						
INDUSTRIAL OPTION 3: Intensification and New Sites		x?	x	x		+++				x	x	x
Industrial Option 1 'Conventional Intensification' under Issue 24 on Employment Land and Waste Management will have: <u>Small beneficial effects (+) on</u> <ul style="list-style-type: none"> protecting and enhancing the quality of Sutton's open environment, promoting urban greening (blue and green infrastructure), promoting ecological pathways and securing biodiversity net gain throughout the Borough (Appraisal Objective 3) reducing traffic levels, reducing congestion, cutting local air pollution, promoting active and sustainable modes of transport and promoting healthy streets (Appraisal Objective 4) promoting economic growth and a strong, sustainable and high-skilled local economy (Appraisal Objective 6); helping to meet the future local need for housing and the Borough's share of London's need (Appraisal Objective 9); maintaining and enhancing good access to health, education, sports, leisure and other public amenities for Borough residents (Appraisal Objective 10) protecting and enhancing the quality of built design, townscape quality, local character and the Borough's historic environment (Appraisal Objective 11) ensuring that the Local Plan does not discriminate against equalities target groups and promotes climate justice (Appraisal Objective 12) <u>Potentially negative (uncertain) effects (+) on</u> <ul style="list-style-type: none"> promoting economic growth and a strong, sustainable and high-skilled local economy (Appraisal Objective 6); promoting area renewal, implementing environmental improvements, supporting the life sciences and attracting investment in infrastructure and high-skilled jobs (Appraisal Objective 7) 							ANALYSIS While Industrial Option 1 'Conventional Intensification' would ensure that employment land is protected from other uses and would have potential benefits in terms of avoiding the strategic release of Green Belt/ MOL, greenfield sites or potential housing sites for industrial uses; sustainable transport objectives and maintaining the suburban character of the Borough, 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 (using the London Plan plot ratio of 65%) as identified in the Employment Land and Economic Needs Assessment (ELENA) 2023. Negative impacts are therefore identified for this low growth option (scoring 'x') in terms of promoting sustainable economic growth, building a strong and high-skilled local economy, securing inward investment and attracting green business. In contrast, Option 2 'Multi-Storey Intensification' would help to meet the high demand for new industrial floorspace 167,000 sq.m. (or 8,338 sq.m. per annum or 26 hectares (using the London Plan plot ratio of 65%) as identified in the ELENA 2023 and therefore have potentially beneficial impacts on promoting sustainable economic growth, building a strong and high-skilled local economy, securing inward investment and attracting green business (scoring ++). 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. Industrial Option 3 'Intensification and new Sites' would provide a further opportunity to help meet industrial need alongside intensification. seek to exceed the identified high demand for new industrial floorspace 167,000 sq.m. (or 8,338 sq.m. per annum or 26 hectares (using the London Plan plot ratio of 65%) 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). However there would be a number of negative impacts in terms of necessitating the further release of MOL or other greenfield sites for industrial use; urban greening and biodiversity objectives; increasing traffic levels and congestion on the Borough's road network; increasing air pollution; taking up land needed for housing and/or essential community infrastructure and townscape quality/ local character/ quality of life.					
Industrial Option 2 'Multi-Storey Intensification' under Issue 24 on Employment Land and Waste Management will have: <u>Medium beneficial effects (++) on:</u> <ul style="list-style-type: none"> promoting economic growth and a strong, sustainable and high-skilled local economy (Appraisal Objective 6); promoting area renewal, implementing environmental improvements, supporting the life sciences and attracting investment in infrastructure and high-skilled jobs (Appraisal Objective 7) <u>Small beneficial effects (+) on</u> <ul style="list-style-type: none"> protecting and enhancing the quality of Sutton's open environment, promoting urban greening (blue and green infrastructure), promoting ecological pathways and securing biodiversity net gain throughout the Borough (Appraisal Objective 3) reducing traffic levels, reducing congestion, cutting local air pollution, promoting active and sustainable modes of transport and promoting healthy streets (Appraisal Objective 4) promoting economic growth and a strong, sustainable and high-skilled local economy (Appraisal Objective 6); helping to meet the future local need for housing and the Borough's share of London's need (Appraisal Objective 9); maintaining and enhancing good access to health, education, sports, leisure and other public amenities for Borough residents (Appraisal Objective 10) protecting and enhancing the quality of built design, townscape quality, local character and the Borough's historic environment (Appraisal Objective 11) ensuring that the Local Plan does not discriminate against equalities target groups and promotes climate justice (Appraisal Objective 12) 												
Industrial Option 3 'Intensification and new Sites' under Issue 24 on Employment Land and Waste Management will have: <u>Small beneficial effects (+) on:</u> <ul style="list-style-type: none"> promoting economic growth and a strong, sustainable and high-skilled local economy (Appraisal Objective 6); promoting area renewal, implementing environmental improvements, supporting the life sciences and attracting investment in infrastructure and high-skilled jobs (Appraisal Objective 7) <u>Potentially negative (uncertain) effects (+) on</u> <ul style="list-style-type: none"> protecting and enhancing the quality of Sutton's open environment, promoting urban greening (blue and green infrastructure), promoting ecological pathways and securing biodiversity net gain throughout the Borough (Appraisal Objective 3) reducing traffic levels, reducing congestion, cutting local air pollution, promoting active and sustainable modes of transport and promoting healthy streets (Appraisal Objective 4) promoting economic growth and a strong, sustainable and high-skilled local economy (Appraisal Objective 6); helping to meet the future local need for housing and the Borough's share of London's need (Appraisal Objective 9); maintaining and enhancing good access to health, education, sports, leisure and other public amenities for Borough residents (Appraisal Objective 10) protecting and enhancing the quality of built design, townscape quality, local character and the Borough's historic environment (Appraisal Objective 11) ensuring that the Local Plan does not discriminate against equalities target groups and promotes climate justice (Appraisal Objective 12) 												

SA FRAMEWORK OBJECTIVES												
(A) Environmental Sustainability				(B) Sustainable Economic Growth					(C) Sustainable Communities			
+ Small beneficial impact ++ Medium beneficial impact +++ Large beneficial impact X Adverse Impact ? Uncertain impact None/ neutral	(1) CLIMATE MITIGATION AND NET ZERO To address causes of climate change by minimising CO ₂ emissions and promoting zero carbon in new development	(2) FLOOD RISK AND WATER RESOURCES To avoid, reduce and manage all sources of flood risk to and from development taking account of climate change	(3) OPEN SPACE, GREENING & BNG To enhance provision and quality of Sutton's open environment, promote greening & biodiversity linkages and promote BNG	(4) SUSTAINABLE TRANSPORT, HEALTHY STREETS AND AIR QUALITY To reduce traffic, reduce congestion, local air pollution, promote sustainable transport and healthy streets	(5) TOWN CENTRES To enhance the vitality and viability and regeneration of Sutton Town Centre and town centres throughout Borough and promote access to community shopping facilities.	(6) SUSTAINABLE ECONOMIC GROWTH, LOCAL EMPLOYMENT EDUCATION & SKILLS To promote a strong, sustainable and high-skilled local economy	(7) URBAN REGENERATION & AREA RENEWAL To create world's leading life science district on the LCH site; promote Sutton Link and secure inward investment for area renewal	(8) GREEN ECONOMY DECENT ENERGY; & DECARBONISATION. To attract green business; promote 'circular' economy; promote decentralised energy & decarbonise social housing & buildings	(9) ACCESS TO HOUSING To meet the future local need for housing and affordable housing and the Borough's share of London's need	(10) SOCIAL AND COMMUNITY INFRASTRUCTURE To maintain and enhance good access to health, education, sports, leisure and other public amenities for Borough residents	(11) BUILT AND HISTORIC ENVIRONMENT To protect and enhance the quality of built design, townscape quality, local character and the Borough's historic environment	(12) EQUALITIES, & CLIMATE JUSTICE Avoid discrimination against equalities groups; promote climate justice, address deprivation; promote healthy & safe communities,

ISSUE 25: INDUSTRIAL USES - updates Policy 15 of Local Plan 2018

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

(a) Within Strategic Industrial Locations and Established Industrial Locations, the Council will grant planning permission for E(g)(ii) (research and development), E(g)(iii) (light industrial), B2 (industrial and manufacturing) and B8 (storage and distribution) uses or other similar industrial uses only.

(b) Development proposals should not result in a net loss of existing industrial floor space for Class E(g)(ii), E(g)(iii), B2 and B8 uses in all designated industrial locations;

(c) Within Strategic Industrial Locations and Established Industrial Locations, development will be expected to contribute to environmental and transport improvements, either through on-site works or through planning obligations, where necessary;

(d) The Council will not grant planning permission for co-location schemes in Strategic Industrial Locations. Co-location schemes proposed in Established Industrial Locations will be considered provided the principle of no net loss of existing industrial floor space is achieved;

(e) The Council will grant permissions for proposals containing trade counters, provided that the display and sales areas are a maximum of 15% of the total net floorspace;

(f) The Council will grant permissions for ancillary uses which will assist the functioning of the Strategic Industrial Locations and Established Industrial Locations, such as small shops and cafes, provided that it can be shown that the use meets only the needs of the employees within the industrial area.

Other Land in Industrial Use

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

DRAFT POLICY 25: Industrial Uses				++	+	+++		+		+	++	
LOCAL PLAN 2018: Policy 15				++	+	+++		+		+	++	

Draft Policy 25 on Industrial Uses will have:

Large beneficial effects (+++) on

- promoting economic growth and a strong, sustainable and high-skilled local economy (Appraisal Objective 6);

Medium beneficial effects (++) on

- reducing traffic levels, reducing congestion, cutting local air pollution, promoting active and sustainable modes of transport and promoting healthy streets (Appraisal Objective 4)
- protecting and enhancing the quality of built design, townscape quality, local character and the Borough's historic environment (Appraisal Objective 11)

Small beneficial effects (+) on

- enhancing the vitality and viability and regeneration of Sutton Town Centre and town centres and promoting access to community shopping facilities (Appraisal Objective 5);
- maintaining and enhancing good access to health, education, sports, leisure and other public amenities for Borough residents (Appraisal Objective 10)

ANALYSIS

Draft Policy 25 on Industrial Uses will have positive sustainability benefits chiefly in relation to promoting economic growth and attracting green business by protecting against the loss of employment and floorspace within Strategic Industrial Locations (SILs) and Established Industrial Locations, restricting trade counters in SILs and only allowing for the loss of industrial / business elsewhere its retention will have a significant adverse effect on residential amenity. There are also benefits in relation to minimising the adverse effects of HGV movements on the Borough road network and improving the quality of the environment within SILs and Established Industrial Locations by securing environmental and transport objectives as part of all planning permissions within industrial areas. There are benefits for townscape quality by ensuring that industrial uses are developed in appropriate locations (i.e. SILs and Established Industrial Locations) and not dispersed throughout the remainder of the Borough.

ISSUE 26: OFFICES - updates Policy 15 of Local Plan 2018

<p>Office Option 1: Policy to meet office floorspace in full (81,583 sq.m.)</p> <ul style="list-style-type: none"> • Acknowledges and applies the national 'floorspace to job' ratio of 12m². • Would identify site allocations to achieve the maximum forecast office floorspace, with a deliberate choice to allocate sites for Use Class E(g). • Sutton Town Centre would be the focus for the majority of office floorspace (70% ≈ 57,108 sq.m.). Floorspace would be achieved through identified office zones and site allocations with specific requirements for Use Class E(g). • The seven District Centres would also serve as identified locations for planned office floorspace (30% ≈ 24,475 sq.m.). Floorspace would be achieved through identified site allocations with specific requirements for Use Class E(g). • The London Cancer Hub would be expected to deliver office floorspace, but this would be considered separately from the identified office floorspace need figure. 	<p>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 & ≈ 30,000 sq.m.)</p> <ul style="list-style-type: none"> • The policy target would be linked to achieving the forecast office job figure, rather than being focused on the quantity of floorspace delivered. This responds to short term uncertainty over office floorspace requirements, and provides flexibility in how the jobs and floorspace will be delivered on the ground. • The policy target and monitoring arrangements would focus on the first ten years of the new Sutton Local Plan. • Would take a permissive approach to facilitating office floorspace in Sutton Town Centre and the seven District Centres. • Office floorspace is expected to come forward as part of mixed use development proposals. • There would be a greater recognition of broader uses within Use Class E (commercial, business and service), including those within Use Class E(c) and Use Class E(g). • The London Cancer Hub would be expected to deliver office floorspace, and this would contribute towards meeting the identified office floorspace need figure.
<p>Office Option 2: Policy to meet minimum office floorspace need (56,620 sq.m.)</p> <ul style="list-style-type: none"> • Applies a Sutton-specific 'floorspace to job' ratio of 7.4m². • Would identify and allocate sites to achieve the minimum forecast office floorspace, with a deliberate choice to allocate sites for Use Class E(g). • Sutton Town Centre would be the focus for the majority of office floorspace (80% ≈ 45,296 sq.m.). Floorspace would be achieved through identified office zones and site allocations with specific requirements for Use Class E(g). • The seven District Centres would only have a residual role in delivering planned office floorspace (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). • The London Cancer Hub would be expected to deliver office floorspace, but this would be considered separately from the identified office floorspace need figure. 	<p>Office Option 4: Policy to realise sufficient floorspace to meet forecast annual office jobs for first five years of Sutton Local Plan (≈ 930 jobs & ≈ 15,000 sq.m.)</p> <ul style="list-style-type: none"> • The policy target would be linked to achieving the forecast office job figure, rather than being focused on the quantity of floorspace delivered. This responds to short term uncertainty over office floorspace requirements, and provides flexibility in how the jobs and floorspace will be delivered on the ground. • The policy target and monitoring arrangements would focus on the first five years of the new Sutton Local Plan. • Would take a permissive approach to facilitating office floorspace in Sutton Town Centre and the seven District Centres. • Office floorspace is expected to come forward as part of mixed use development proposals. • There would be a greater recognition of broader uses within Use Class E (commercial, business and service), including those within Use Class E(c) and Use Class E(g). • The London Cancer Hub would be expected to deliver office floorspace, and this would contribute towards meeting the identified office floorspace need figure.

	SA FRAMEWORK OBJECTIVES											
	(A) Environmental Sustainability				(B) Sustainable Economic Growth				(C) Sustainable Communities			
+ Small beneficial impact ++ Medium beneficial impact +++ Large beneficial impact X Adverse Impact ? Uncertain impact None/ neutral	(1) CLIMATE MITIGATION AND NET ZERO To address causes of climate change by minimising CO ₂ emissions and promoting zero carbon in new development	(2) FLOOD RISK AND WATER RESOURCES To avoid, reduce and manage all sources of flood risk to and from development taking account of climate change	(3) OPEN SPACE, GREENING & BNG To enhance provision and quality of Sutton's open environment, promote greening & biodiversity linkages and promote BNG	(4) SUSTAINABLE TRANSPORT, HEALTHY STREETS AND AIR QUALITY To reduce traffic, reduce congestion, local air pollution, promote sustainable transport and healthy streets	(5) TOWN CENTRES To enhance the vitality and viability and regeneration of Sutton Town Centre and town centres throughout Borough and promote access to community shopping facilities.	(6) SUSTAINABLE ECONOMIC GROWTH, LOCAL EMPLOYMENT EDUCATION & SKILLS To promote a strong, sustainable and high-skilled local economy	(7) URBAN REGENERATION & AREA RENEWAL To create world's leading life science district on the LCH site; promote Sutton Link and secure inward investment for area renewal	(8) GREEN ECONOMY DECENT ENERGY; & DECARBONISATION. To attract green business; promote 'circular' economy; promote decentralised energy & decarbonise social housing & buildings	(9) ACCESS TO HOUSING To meet the future local need for housing and affordable housing and the Borough's share of London's need	(10) SOCIAL AND COMMUNITY INFRASTRUCTURE To maintain and enhance good access to health, education, sports, leisure and other public amenities for Borough residents	(11) BUILT AND HISTORIC ENVIRONMENT To protect and enhance the quality of built design, townscape quality, local character and the Borough's historic environment	(12) EQUALITIES, & CLIMATE JUSTICE Avoid discrimination against equalities groups; promote climate justice, address deprivation; promote healthy & safe communities,
OPTION 1: Meet office floorspace in full (81,583 sq.m.).					++?	++?			X			
OPTION 2: Meet minimum office floorspace need (56,620 sq.m.).					+	+			+			
OPTION 3: Realise sufficient floorspace to meet forecast annual office jobs for first 10 years of Local Plan (≈ 1,860 jobs & ≈ 30,000 sq.m.)					x?	x?			+			
OPTION 4: Release sufficient floorspace to meet forecast annual office jobs for first five years of Local Plan (≈ 930 jobs & ≈ 15,000 sq.m.)					X	X			+			
Option 1: High growth (Meet office floorspace in full - 81,583 sq.m.). <u>Medium beneficial effects (++) on:</u> <ul style="list-style-type: none"> enhancing the vitality and viability of Sutton Town Centre and town centres throughout the Borough (Appraisal Objective 5) promoting economic growth and a strong, sustainable and high-skilled local economy (Appraisal Objective 6); <u>Potentially negative effects (x) on</u> <ul style="list-style-type: none"> helping to meet the future local need for housing and the Borough's share of London's need (Appraisal Objective 9); maintaining and enhancing good access to social and community infrastructure (Appraisal Objective 10) 							ANALYSIS As noted in the Local Plan Issues and Preferred Options (Regulation 18) consultation document, there is some uncertainty affecting this area of policy. The Employment Land and Economic Needs Assessment (ELENA) 2023 concluded that the demand for office space in Sutton is weak and that growth in office jobs was not resulting in an increase in demand for additional floorspace. At the same time, there has been strong jobs growth over the plan period, which would be expected to translate into a high office floorspace figure. Based on a floorspace to job ratio of 12 sq.m. the office need is calculated 81,583 sq.m. (or 4,079 sq.m. per annum). Based on a ratio of 7.4 sq.m. the office need is 56,620 sq.m. (or 2,831 sq.m. per annum). There is therefore a conflict between the weak office market and low market demand for office space versus the employment study identifying significant jobs growth.					
Option 2: Medium growth (Meet minimum office floorspace need - 56,620 sq.m.). <u>Medium beneficial effects (++) on:</u> <ul style="list-style-type: none"> enhancing the vitality and viability of Sutton Town Centre and town centres throughout the Borough (Appraisal Objective 5) promoting economic growth and a strong, sustainable and high-skilled local economy (Appraisal Objective 6); <u>Potentially negative (uncertain) effects (x?) on</u> <ul style="list-style-type: none"> helping to meet the future local need for housing and the Borough's share of London's need (Appraisal Objective 9); maintaining and enhancing good access to social and community infrastructure (Appraisal Objective 10) 							It should be noted that office Options 1 (high growth), 2 (medium growth) and 3 (low growth) under Policy Issue 27 are aligned with strategic Options C, B and A under Policy Issue 1.3 above. Both Options 1 (high growth) and 2 (medium growth) are generally predicted to have positive impacts on promoting economic growth and a strong, sustainable and high-skilled local economy and enhancing the vitality and viability of Sutton Town Centre and other town centres. However the likely extent of the predicted benefits of each policy option will be significantly influenced by how much job growth can be accommodated within the Borough without necessarily requiring additional floorspace e.g. through optimising existing space and/or the growth of hybrid working alongside home-working. By providing for more office floorspace than the low growth options Options 3 or 4, Option 2 (medium growth) and particularly Option 1 (high growth) could have some potentially negative impacts in terms of housing delivery or accommodating social and community infrastructure within town centre locations.					
Option 3: Low growth (Release sufficient floorspace to meet forecast annual office jobs for first 10 years of Local Plan ≈ 1,860 jobs & ≈ 30,000 sq.m.) <u>Small beneficial effects (+) on</u> <ul style="list-style-type: none"> enhancing the vitality and viability of Sutton Town Centre and town centres throughout the Borough (Appraisal Objective 5) promoting economic growth and a strong, sustainable and high-skilled local economy (Appraisal Objective 6); 												
Option 4: Lower growth Release sufficient floorspace to meet forecast annual office jobs for first five years of Local Plan (≈ 930 jobs & ≈ 15,000 sq.m.) <u>Small beneficial effects (+) on</u> <ul style="list-style-type: none"> enhancing the vitality and viability of Sutton Town Centre and town centres throughout the Borough (Appraisal Objective 5) promoting economic growth and a strong, sustainable and high-skilled local economy (Appraisal Objective 6); 												

	SA FRAMEWORK OBJECTIVES											
	(A) Environmental Sustainability				(B) Sustainable Economic Growth				(C) Sustainable Communities			
+ Small beneficial impact ++ Medium beneficial impact +++ Large beneficial impact X Adverse Impact ? Uncertain impact None/ neutral	(1) CLIMATE MITIGATION AND NET ZERO To address causes of climate change by minimising CO ₂ emissions and promoting zero carbon in new development	(2) FLOOD RISK AND WATER RESOURCES To avoid, reduce and manage all sources of flood risk to and from development taking account of climate change	(3) OPEN SPACE, GREENING & BNG To enhance provision and quality of Sutton's open environment, promote greening & biodiversity linkages and promote BNG	(4) SUSTAINABLE TRANSPORT, HEALTHY STREETS AND AIR QUALITY To reduce traffic, reduce congestion, local air pollution, promote sustainable transport and healthy streets	(5) TOWN CENTRES To enhance the vitality and viability and regeneration of Sutton Town Centre and town centres throughout Borough and promote access to community shopping facilities.	(6) SUSTAINABLE ECONOMIC GROWTH, LOCAL EMPLOYMENT EDUCATION & SKILLS To promote a strong, sustainable and high-skilled local economy	(7) URBAN REGENERATION & AREA RENEWAL To create world's leading life science district on the LCH site; promote Sutton Link and secure inward investment for area renewal	(8) GREEN ECONOMY DECENT ENERGY; & DECARBONISATION. To attract green business; promote 'circular' economy; promote decentralised energy & decarbonise social housing & buildings	(9) ACCESS TO HOUSING To meet the future local need for housing and affordable housing and the Borough's share of London's need	(10) SOCIAL AND COMMUNITY INFRASTRUCTURE To maintain and enhance good access to health, education, sports, leisure and other public amenities for Borough residents	(11) BUILT AND HISTORIC ENVIRONMENT To protect and enhance the quality of built design, townscape quality, local character and the Borough's historic environment	(12) EQUALITIES, & CLIMATE JUSTICE Avoid discrimination against equalities groups; promote climate justice, address deprivation; promote healthy & safe communities,

ISSUE 27: TOWN CENTRES AND RETAIL - updates and combines Policies 17, 18 and 19 of Local Plan 2018

HIERARCHY OF TOWN CENTRES

(a) The council has established a network and hierarchy of town centres, this is set out in **table 27.2** below.

(b) A primary shopping area (psa) will be defined for the town and district centres. The options are shown in appendix 3. The extent of the psas will be used in the application of the sequential test and impact test set out in part (g) and (h).

(c) Development proposals in the psas are expected to support the retail function of each town centre. Class e(a) retail uses will be prioritised in these locations, with non-class e(a) retail uses only supported where they can demonstrate that the proposal will not undermine the vibrancy, vitality, and viability of the centre. Planning conditions may be used to secure class e(a) uses.

(d) 'meanwhile uses' will be supported in vacant shopfronts and on vacant sites in town centres where proposed uses contribute to the diversity, vitality and viability of centres having regard to the scale of the proposal in relation to the centre's position in the hierarchy of town centres.

(e) Development in district centres and local centres should be appropriate in scale and function to the role of that centre.

Isolated shops

(f) Outside town, district and local centres, the council will not grant planning permission for the loss of class e(a) retail within areas of more than 400 metres walking distance from alternative shopping facilities, unless it has been demonstrated that the shop has been marketed at a reasonable market rent through a recognised agent for 12 months.

Sequential and impact test

(g) The vitality and viability of town centres will be maintained and enhanced by promoting a mix of uses, including housing. Town centres will be the preferred locations for retail and leisure developments, and other commercial, business and service uses, and will be used to inform the application of the sequential test and/or impact test.

(h) Proposals for main town centres uses, which are not located within one of the town centres, will be required to submit a retail impact assessment. The threshold for the retail impact assessments is as follows (i) sutton town centre = 500 sq.m. gross floorspace (ii) district centres = 280 sq.m. gross floorspace.

Hot food takeaways

(i) In accordance with london plan policy e9, development proposals containing hot food takeaway uses (sui generis) should not be permitted where these are within 400 metres walking distance from the entrances and exits of an existing or proposed primary or secondary school.

Residential development

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

FOR SUTTON TOWN CENTRE BOUNDARY, EACH OF THE SEVEN DISTRICT CENTRE BOUNDARIES, AND EACH OF THE LOCAL CENTRES SEE THE LOCAL PLAN APPENDIX AND POLICIES MAP

DRAFT POLICY 27: Town Centres and Retail				++	+++	++			++	++	++	++
LOCAL PLAN 2018: Policies 17, 18 and 19				+?	+++	++			++	++	++	++

Draft Policy 27 on Town Centres and Retail will have:

Large beneficial effects (+++) on

- enhancing the vitality and viability and regeneration of Sutton Town Centre and town centres and promoting access to community shopping facilities (Appraisal Objective 5);

Medium beneficial effects (++) on

- reducing traffic levels, reducing congestion, cutting local air pollution, promoting active and sustainable modes of transport and promoting healthy streets (Appraisal Objective 4)
- promoting economic growth and a strong, sustainable and high-skilled local economy (Appraisal Objective 6);
- helping to meet the future local need for housing and the Borough's share of London's need (Appraisal Objective 9)
- maintaining and enhancing good access to health, education, sports, leisure and other public amenities for Borough residents (Appraisal Objective 10)
- protecting and enhancing the quality of built design, townscape quality, local character and the Borough's historic environment (Appraisal Objective 11)
- ensuring that the Local Plan does not discriminate against equalities target groups and promotes climate justice (Appraisal Objective 12)

ANALYSIS

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, and by applying the sequential/ impact test for proposed retail developments situated outside of town centre boundaries. 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; and on townscape and residential amenity by ensuring that the conversion of the upper floor of town centre buildings 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

	SA FRAMEWORK OBJECTIVES											
	(A) Environmental Sustainability				(B) Sustainable Economic Growth				(C) Sustainable Communities			
+ Small beneficial impact ++ Medium beneficial impact +++ Large beneficial impact X Adverse Impact ? Uncertain impact None/ neutral	(1) CLIMATE MITIGATION AND NET ZERO To address causes of climate change by minimising CO ₂ emissions and promoting zero carbon in new development	(2) FLOOD RISK AND WATER RESOURCES To avoid, reduce and manage all sources of flood risk to and from development taking account of climate change	(3) OPEN SPACE, GREENING & BNG To enhance provision and quality of Sutton's open environment, promote greening & biodiversity linkages and promote BNG	(4) SUSTAINABLE TRANSPORT, HEALTHY STREETS AND AIR QUALITY To reduce traffic, reduce congestion, local air pollution, promote sustainable transport and healthy streets	(5) TOWN CENTRES To enhance the vitality and viability and regeneration of Sutton Town Centre and town centres throughout Borough and promote access to community shopping facilities.	(6) SUSTAINABLE ECONOMIC GROWTH, LOCAL EMPLOYMENT EDUCATION & SKILLS To promote a strong, sustainable and high-skilled local economy	(7) URBAN REGENERATION & AREA RENEWAL To create world's leading life science district on the LCH site; promote Sutton Link and secure inward investment for area renewal	(8) GREEN ECONOMY DECENT ENERGY; & DECARBONISATION. To attract green business; promote 'circular' economy; promote decentralised energy & decarbonise social housing & buildings	(9) ACCESS TO HOUSING To meet the future local need for housing and affordable housing and the Borough's share of London's need	(10) SOCIAL AND COMMUNITY INFRASTRUCTURE To maintain and enhance good access to health, education, sports, leisure and other public amenities for Borough residents	(11) BUILT AND HISTORIC ENVIRONMENT To protect and enhance the quality of built design, townscape quality, local character and the Borough's historic environment	(12) EQUALITIES, & CLIMATE JUSTICE Avoid discrimination against equalities groups; promote climate justice, address deprivation; promote healthy & safe communities,

SERVING SUTTON'S COMMUNITIES

ISSUE 28: EDUCATION AND SKILLS- updates Policy 20 of Local Plan 2018

(a) The Council will provide or support the provision of new or expanded primary, secondary, special schools and further educational facilities, to meet the needs of Sutton's population and enhance educational provision in the borough.
 (b) The Council will safeguard the following sites for SEND provision:
 • Sheen Way Playing Fields, Wallington
 • All-Weather Pitch and Part of the Tennis Centre at Rosehill Recreation Ground.
 The Council will keep the need for new primary and secondary schools under review. If required, the Council will search for additional sites during the plan period.
 (c) The Council will support adult learning and further / higher education providers in the borough and will balance their requirements with those of other sectors and the local community. In assessing applications for further and higher education uses, the Council will ensure that such developments are sensitive to their surroundings, take into account the impact on the mix of uses in the area, be in areas of good public transport accessibility and seek to protect residential uses and the local environment.

DRAFT POLICY 28: Education and Skills			X?	++		+++			+	+++		+++
LOCAL PLAN 2018: Policy 20			X?	++		+++			+	+++		+++

Draft Policy 28 on Education and Skills will have:
Large beneficial effects (+++) on
 • promoting education, economic growth and a strong, sustainable and high-skilled local economy (Appraisal Objective 6);
 • maintaining and enhancing good access to health, education, sports, leisure and other public amenities for Borough residents (Appraisal Objective 10)
 • ensuring that the Local Plan does not discriminate against equalities target groups (Appraisal Objective 12)
Medium beneficial effects (++) on
 • helping to meet the future local need for housing and the Borough's share of London's need (Appraisal Objective 9)
Potentially negative beneficial effects (+) on
 • protecting and enhancing the quality of Sutton's open environment (Appraisal Objective 3)

ANALYSIS
 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 is assessed as having significantly positive benefits in terms of promoting education (Appraisal Objective 6) and maintaining and enhancing good access to education facilities amenities for Borough residents (Appraisal Objective 10). Making provision for SEND school capacity is also clearly beneficial in terms of equalities and has benefits for children with special educational needs (such children are identified as forming one of a number of equalities target groups). The commitment included within the wording of draft Policy 28 around ensuring that planning applications for further and higher education uses are in areas of good public transport accessibility also has benefits for sustainable transport objectives.

ISSUE 29: HEALTH AND WELL-BEING - updates Policy 21 of Local Plan 2018

(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

DRAFT POLICY 29: Health and Well-Being			++	++		+++			+++		+++	+++
LOCAL PLAN 2018: Policy 21			++	++		+++			++		++	++

Draft Policy 29 on Health and Well-Being will have:
Large beneficial effects (+++) on
 • promoting area renewal, implementing environmental improvements, supporting the life sciences and attracting investment in infrastructure and high-skilled jobs (Appraisal Objective 7)
 • maintaining and enhancing good access to health, education, sports, leisure and other public amenities for Borough residents (Appraisal Objective 10)
 • ensuring that the Local Plan does not discriminate against equalities target groups and promotes climate justice (Appraisal Objective 12)
Medium beneficial effects (++) on
 • addressing the causes of climate change by minimising CO₂ emissions and promoting zero carbon standards in new development (Appraisal Objective 1)
 • avoiding, reducing and managing all sources of flood risk taking account of climate change (Appraisal Objective 2) ;
 • protecting and enhancing the quality of Sutton's open environment, promoting urban greening (blue and green infrastructure), promoting ecological pathways and securing biodiversity net gain throughout the Borough (Appraisal Objective 3)
 • reducing traffic levels, reducing congestion, cutting local air pollution, promoting active and sustainable modes of transport and promoting healthy streets (Appraisal Objective 4)

ANALYSIS
 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 and for equalities. 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

SA FRAMEWORK OBJECTIVES												
(A) Environmental Sustainability				(B) Sustainable Economic Growth				(C) Sustainable Communities				
	(1) CLIMATE MITIGATION AND NET ZERO To address causes of climate change by minimising CO ₂ emissions and promoting zero carbon in new development	(2) FLOOD RISK AND WATER RESOURCES To avoid, reduce and manage all sources of flood risk to and from development taking account of climate change	(3) OPEN SPACE, GREENING & BNG To enhance provision and quality of Sutton's open environment, promote greening & biodiversity linkages and promote BNG	(4) SUSTAINABLE TRANSPORT, HEALTHY STREETS AND AIR QUALITY To reduce traffic, reduce congestion, local air pollution, promote sustainable transport and healthy streets	(5) TOWN CENTRES To enhance the vitality and viability and regeneration of Sutton Town Centre and town centres throughout Borough and promote access to community shopping facilities.	(6) SUSTAINABLE ECONOMIC GROWTH, LOCAL EMPLOYMENT EDUCATION & SKILLS To promote a strong, sustainable and high-skilled local economy	(7) URBAN REGENERATION & AREA RENEWAL To create world's leading life science district on the LCH site; promote Sutton Link and secure inward investment for area renewal	(8) GREEN ECONOMY DECENT ENERGY; & DECARBONISATION. To attract green business; promote 'circular' economy; promote decentralised energy & decarbonise social housing & buildings	(9) ACCESS TO HOUSING To meet the future local need for housing and affordable housing and the Borough's share of London's need	(10) SOCIAL AND COMMUNITY INFRASTRUCTURE To maintain and enhance good access to health, education, sports, leisure and other public amenities for Borough residents	(11) BUILT AND HISTORIC ENVIRONMENT To protect and enhance the quality of built design, townscape quality, local character and the Borough's historic environment	(12) EQUALITIES, & CLIMATE JUSTICE Avoid discrimination against equalities groups; promote climate justice, address deprivation; promote healthy & safe communities,
+ Small beneficial impact ++ Medium beneficial impact +++ Large beneficial impact X Adverse Impact ? Uncertain impact None/ neutral												
ISSUE 30: SOCIAL AND COMMUNITY INFRASTRUCTURE - updates Policy 22 of Local Plan 2018												
<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>												
DRAFT POLICY 30: Social and Community Infrastructure			++	++			+++			+++	++	+++
LOCAL PLAN 2018: Policy 22			++	++			++			+++	++	+++
Draft Policy 30 on Social and Community Infrastructure will have:							ANALYSIS					
<p><u>Large beneficial effects (+++) on</u></p> <ul style="list-style-type: none"> promoting area renewal, implementing environmental improvements, supporting the life sciences and attracting investment in infrastructure and high-skilled jobs (Appraisal Objective 7) maintaining and enhancing good access to health, education, sports, leisure and other public amenities for Borough residents (Appraisal Objective 10) ensuring that the Local Plan does not discriminate against equalities target groups and promotes climate justice (Appraisal Objective 12) <p><u>Medium beneficial effects (++) on</u></p> <ul style="list-style-type: none"> protecting and enhancing the quality of Sutton's open environment, promoting urban greening (blue and green infrastructure), promoting ecological pathways and securing biodiversity net gain throughout the Borough (Appraisal Objective 3) reducing traffic levels, reducing congestion, cutting local air pollution, promoting active and sustainable modes of transport and promoting healthy streets (Appraisal Objective 4) protecting and enhancing the quality of built design, townscape quality, local character and the Borough's historic environment (Appraisal Objective 11) 							<p>Draft Policy 30 on Social and Community Infrastructure will have a number of positive sustainability impacts in terms of maintaining and enhancing good access to social and community infrastructure (Appraisal objective 10) while ensuring that proposed facilities are local within or at the edge of town centres and other locations with good access to sustainable and active modes of transport (Appraisal objective 4). The provision of flexible and adaptable space will deliver benefits for equalities objectives (Appraisal objective 12) and the policy protection afforded to public houses and bars of historic or architectural interest will deliver benefits for the Borough's historic environment (Appraisal objective 11)</p>					
ISSUE 31: UTILITIES AND DIGITAL INFRASTRUCTURE - updates Policy 23 of Local Plan 2018												
Overall Approach to Utilities and Digital Infrastructure												
<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>												
Design Considerations for Digital Infrastructure												
<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>												
DRAFT POLICY 31: Utilities & Digital Infrastructure						++			++	++	++	++
LOCAL PLAN 2018: Policy 23						++			++	++	++	++
Draft Policy 31 on Utilities and Digital Infrastructure will have:							ANALYSIS					
<p><u>Medium beneficial effects (++) on</u></p> <ul style="list-style-type: none"> promoting economic growth and a strong, sustainable and high-skilled local economy (Appraisal Objective 6); maintaining and enhancing good access to health, education, sports, leisure and other public amenities for Borough residents (Appraisal Objective 10) protecting and enhancing the quality of built design, townscape quality, local character and the Borough's historic environment (Appraisal Objective 11) ensuring that the Local Plan does not discriminate against equalities target groups and promotes climate justice (Appraisal Objective 12) 							<p>Draft Policy 31 on Utilities and Digital Infrastructure will have a number of positive sustainability impacts in relation to promoting a strong, high-skill local economy (Appraisal objective 6); delivering social and community infrastructure (Appraisal objective 10) while ensuring that such developments are sited and designed in such a way that it does not adversely affect the appearance of the surrounding area. This policy will help 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 demand from the development.</p>					

	SA FRAMEWORK OBJECTIVES											
	(A) Environmental Sustainability				(B) Sustainable Economic Growth				(C) Sustainable Communities			
+ Small beneficial impact ++ Medium beneficial impact +++ Large beneficial impact X Adverse Impact ? Uncertain impact None/ neutral	(1) CLIMATE MITIGATION AND NET ZERO To address causes of climate change by minimising CO ₂ emissions and promoting zero carbon in new development	(2) FLOOD RISK AND WATER RESOURCES To avoid, reduce and manage all sources of flood risk to and from development taking account of climate change	(3) OPEN SPACE, GREENING & BNG To enhance provision and quality of Sutton's open environment, promote greening & biodiversity linkages and promote BNG	(4) SUSTAINABLE TRANSPORT, HEALTHY STREETS AND AIR QUALITY To reduce traffic, reduce congestion, local air pollution, promote sustainable transport and healthy streets	(5) TOWN CENTRES To enhance the vitality and viability and regeneration of Sutton Town Centre and town centres throughout Borough and promote access to community shopping facilities.	(6) SUSTAINABLE ECONOMIC GROWTH, LOCAL EMPLOYMENT EDUCATION & SKILLS To promote a strong, sustainable and high-skilled local economy	(7) URBAN REGENERATION & AREA RENEWAL To create world's leading life science district on the LCH site; promote Sutton Link and secure inward investment for area renewal	(8) GREEN ECONOMY DECENT ENERGY; & DECARBONISATION. To attract green business; promote 'circular' economy; promote decentralised energy & decarbonise social housing & buildings	(9) ACCESS TO HOUSING To meet the future local need for housing and affordable housing and the Borough's share of London's need	(10) SOCIAL AND COMMUNITY INFRASTRUCTURE To maintain and enhance good access to health, education, sports, leisure and other public amenities for Borough residents	(11) BUILT AND HISTORIC ENVIRONMENT To protect and enhance the quality of built design, townscape quality, local character and the Borough's historic environment	(12) EQUALITIES, & CLIMATE JUSTICE Avoid discrimination against equalities groups; promote climate justice, address deprivation; promote healthy & safe communities,

GREENING SUTTON

Issue 32: GREEN BELT AND METROPOLITAN OPEN LAND (MOL) - updates Policy 24 of Local Plan 2018

Policy Option 1: Green Belt and MOL

(a) The Council will not grant planning permission for inappropriate development in the Green Belt or Metropolitan Open Land unless other material considerations clearly outweigh the harm to the Green Belt or Metropolitan Open Land and constitute very special circumstances. The construction of new buildings and structures or the re-use of buildings and structures in the Green Belt and Metropolitan Open Land will be inappropriate unless it is for the following purposes:

- (i) agriculture, horticulture or animal-related businesses.
- (ii) appropriate facilities for outdoor sport and recreation and cemeteries.

Any new buildings or structures or the re-use of buildings and structures should preserve the openness of the Green Belt or Metropolitan Open Land.

(b) The Council will grant planning permission for extensions to, alterations to and the replacement of an existing building or structure in the Green Belt or Metropolitan Open Land provided that:

- (i) the increase in the external volume of the built form is no greater than 30% above the size of the original building or structure; and
- (ii) the proposals would be proportionate in relation to the existing building or structure taking into account the mass, scale and any increase in ridge height

(c) The Council will grant planning permission for redevelopment of previously developed sites comprising two or more non-ancillary buildings, excluding temporary buildings, which would:

- (i) not have a greater impact on the openness of the Green Belt or Metropolitan Open Land than the existing development; or
- (ii) meet an identified affordable housing need within the borough where the development would not cause substantial harm to the openness of the Green Belt or MOL

Policy Option 2: Green Belt and MOL

(a) The Council will protect the Metropolitan Green Belt and Metropolitan Open Land from inappropriate development unless very special circumstances can be demonstrated in accordance with National Planning Policy and the London Plan.

(b) Any extensions to, alterations to and the replacement of an existing building or structure in the Green Belt or Metropolitan Open Land should

- (i) result in an increase in the external volume of the built form which is no greater than 30% above the size of the original building or structure; and
- (ii) be proportionate in relation to the existing building or structure taking into account the mass, scale and any increase in ridge height.

Both Policy Options 1 and 2

(a) Potential Additions to Green Belt and MOL (for)

(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.

(b) Potential Deletions from Green Belt and MOL (for both Policy Options 1 and 2)

(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)

POLICY OPTION 1			++	x?					+	++		+
POLICY OPTION 2			+++	+					-	+		-

Policy Option 1 under Issue 32 'Green Belt and MOL' will have:

Medium beneficial effects (++) on

- protecting and enhancing the quality of Sutton's open environment, promoting urban greening (blue and green infrastructure), promoting ecological pathways and securing biodiversity net gain throughout the Borough (Appraisal Objective 3)

Small beneficial effects (+) on

- helping to meet the future local need for housing and the Borough's share of London's need (Appraisal Objective 9)
- maintaining and enhancing good access to health, education, sports, leisure and other public amenities for Borough residents (Appraisal Objective 10)
- ensuring that the Local Plan does not discriminate against equalities target groups and promotes climate justice (Appraisal Objective 12)

Potentially negative beneficial effects (+) on

- reducing traffic levels, reducing congestion, cutting local air pollution, promoting active and sustainable modes of transport and promoting healthy streets (Appraisal Objective 4)

Policy Option 2 under Issue 32 'Green Belt and MOL' will have:

Large beneficial effects (+++) on

- protecting and enhancing the quality of Sutton's open environment, promoting urban greening (blue and green infrastructure), promoting ecological pathways and securing biodiversity net gain throughout the Borough (Appraisal Objective 3)

Medium beneficial effects (++) on

- maintaining and enhancing good access to health, education, sports, leisure and other public amenities for Borough residents (Appraisal Objective 10)

Small beneficial effects (+) on

- reducing traffic levels, reducing congestion, cutting local air pollution, promoting active and sustainable modes of transport and promoting healthy streets (Appraisal Objective 4)

ANALYSIS

Both Policy options 1 and 2 are identified as having beneficial sustainability 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 Metropolitan Open Land 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.

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. The scores awarded in the appraisal table above reflect the fact that while allowing affordable housing or sports and leisure facilities to be developed on Green Belt or MOL land in some circumstance may deliver positive benefits in terms of meeting housing needs (Appraisal Objective 9), delivering community infrastructure (Appraisal Objective 10) and equalities (Appraisal Objective 12), there may be negative impacts on sustainable transport objectives due to the higher likelihood of locating travel generating development away from town centres and their surrounding areas of potential intensification

SA FRAMEWORK OBJECTIVES												
	(A) Environmental Sustainability				(B) Sustainable Economic Growth				(C) Sustainable Communities			
	(1) CLIMATE MITIGATION AND NET ZERO To address causes of climate change by minimising CO ₂ emissions and promoting zero carbon in new development	(2) FLOOD RISK AND WATER RESOURCES To avoid, reduce and manage all sources of flood risk to and from development taking account of climate change	(3) OPEN SPACE, GREENING & BNG To enhance provision and quality of Sutton's open environment, promote greening & biodiversity linkages and promote BNG	(4) SUSTAINABLE TRANSPORT, HEALTHY STREETS AND AIR QUALITY To reduce traffic, reduce congestion, local air pollution, promote sustainable transport and healthy streets	(5) TOWN CENTRES To enhance the vitality and viability and regeneration of Sutton Town Centre and town centres throughout Borough and promote access to community shopping facilities.	(6) SUSTAINABLE ECONOMIC GROWTH, LOCAL EMPLOYMENT EDUCATION & SKILLS To promote a strong, sustainable and high-skilled local economy	(7) URBAN REGENERATION & AREA RENEWAL To create world's leading life science district on the LCH site; promote Sutton Link and secure inward investment for area renewal	(8) GREEN ECONOMY DECENT ENERGY; & DECARBONISATION. To attract green business; promote 'circular' economy; promote decentralised energy & decarbonise social housing & buildings	(9) ACCESS TO HOUSING To meet the future local need for housing and affordable housing and the Borough's share of London's need	(10) SOCIAL AND COMMUNITY INFRASTRUCTURE To maintain and enhance good access to health, education, sports, leisure and other public amenities for Borough residents	(11) BUILT AND HISTORIC ENVIRONMENT To protect and enhance the quality of built design, townscape quality, local character and the Borough's historic environment	(12) EQUALITIES, & CLIMATE JUSTICE Avoid discrimination against equalities groups; promote climate justice, address deprivation; promote healthy & safe communities,
+ Small beneficial impact ++ Medium beneficial impact +++ Large beneficial impact X Adverse Impact ? Uncertain impact None/ neutral												
ISSUE 33: AGRICULTURAL LAND - updates Policy 27 of Local Plan 2018												
On agricultural land, defined as the Woodcote Green Belt: (a) The Council will only grant permission for agricultural, horticultural and animal-related businesses provided that they are of a scale appropriate with the size of the site. (b) The Council will only permit development that would lead to the loss of the Best and Most Versatile if (i) it has been demonstrated that the benefits of the development outweigh the loss of Best and Most Versatile; and (ii) the loss would not result in a reduction of the viability of the remaining agricultural land. (c) The Council will not permit new agricultural, horticultural or animal-related business buildings unless it is satisfied that they are necessary, do not affect the character of the area and that there are no other suitable buildings on the site for the proposed use. The Council will assess whether existing agricultural, horticultural, or commercial buildings are being used for those purposes. Proposals must be accompanied by a comprehensive business diversification plan, which establishes how the proposals will assist the viability of the business. (d) The Council will grant planning permission for residential units arising out of the replacement or redevelopment of vacant agricultural, horticultural, or commercial buildings, provided that (i) it can be demonstrated the building had been in active agricultural, horticultural, or commercial use for a 10-year period prior to its becoming vacant and there is no prospect of the building being used for agricultural, horticultural, or commercial use in the future (ii) it can be evidenced that a replacement building for agricultural, horticultural, or commercial use would not be viable; and (iii) the residential unit will have a maximum plot size of 0.2ha for each detached dwelling and 0.1ha for each semi-detached dwelling.												
DRAFT POLICY 33: Agricultural Land			++			+			+		++	
LOCAL PLAN 2018: Policy 27			++			+			+		++	
Draft Policy 33 on Agricultural Land will have:							ANALYSIS					
<u>Medium beneficial effects (++) on</u> <ul style="list-style-type: none"> protecting and enhancing the quality of Sutton's open environment, promoting urban greening, promoting ecological pathways and securing biodiversity net gain (Appraisal Objective 3) protecting and enhancing the quality of built design, townscape quality, local character and the Borough's historic environment (Appraisal Objective 11) 							Draft Policy 33 on Agricultural Land is considered to have significant beneficial sustainability effects in terms of protecting and enhancing the provision of open space, including Green Belt land (Appraisal Objective 3); and for ensuring that the proposed replacement or redevelopment of agricultural, horticultural or animal-related business buildings do not affect the character of the area (Appraisal Objective 11). There are also potential beneficial effects for promoting the local economy (Appraisal objective 6) by seeking to prevent Green Belt development lead to the loss of the 'Best and Most Versatile' agricultural land and in terms of helping to meet the need for affordable housing (Appraisal Objective 9).					
<u>Small beneficial effects (+) on</u> <ul style="list-style-type: none"> promoting economic growth and a strong, sustainable and high-skilled local economy (Appraisal Objective 6); helping to meet the future local need for housing and the Borough's share of London's need (Appraisal Objective 9) 												
ISSUE 34: OPEN SPACES - updates Policy 25 of Local Plan 2018												
(a) The Council will seek to retain the existing level of open space in the borough by: (i) refusing development of all open space and play space in the borough, including Public Open Space and Urban Green Space identified on the Policies Map and smaller areas of open space of recreational and amenity value not identified on the Policies Map, unless: (1) it can be demonstrated that such development would preserve or enhance its open character, its function as a sport, leisure or recreational resource, and its contribution to visual amenity and/or public benefit, or (2) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in the local area. (ii) enhancing the supply of open space to meet the needs of the borough's growing population, by seeking on-site provision of publicly accessible open space, particularly in major new development in areas of deficiency. (iii) supporting improvements, enhancements, and management that improve both quality and access to existing green spaces. (iv) enhancing the role of Metropolitan Green Chains within the borough by protecting the open spaces within them from inappropriate development and improving walking and cycling linkages between them. (v) working with partners and stakeholders to support and promote measures to help deliver the vision of the Wandle Valley Regional Park as a network of high quality, accessible and interconnected open spaces based around the River Wandle. (vi) supporting new high quality outdoor sports facilities to promote sports and recreation across the borough. (vii) promoting the multi-functional and shared use of existing open space for play and sports facilities and playing pitches, subject to satisfactory management arrangements being put in place. (viii) resisting development on allotments, unless it can be demonstrated that: (1) they are no longer needed to meet local demand. (2) existing allotment users can be relocated to a new or existing allotment site within a reasonable distance of their homes. (b) The Council will encourage and support the provision of community-run and managed allotments and community food growing spaces in major new developments where practicable. (c) The Council will safeguard sufficient land required to meet the borough's future need for burial space over the plan period												
DRAFT POLICY 34: Open Spaces	+	++	+++	+++						+++	++	+++
LOCAL PLAN 2018: Policy 25	+	++	+++	+++						+++	++	+++
Draft Policy 34 on Open Spaces will have:							ANALYSIS					
<u>Large beneficial effects (+++) on</u> <ul style="list-style-type: none"> protecting and enhancing the quality of Sutton's open environment, promoting urban greening (blue and green infrastructure), promoting ecological pathways and securing biodiversity net gain throughout the Borough (Appraisal Objective 3) reducing traffic levels, reducing congestion, cutting local air pollution, promoting active and sustainable modes of transport and promoting healthy streets (Appraisal Objective 4) maintaining and enhancing good access to health, education, sports, leisure and other public amenities for Borough residents (Appraisal Objective 10) ensuring that the Local Plan does not discriminate against equalities target groups and promotes climate justice (Appraisal Objective 12) 							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. Proposed developments on open space will not be permitted unless it can be demonstrated that it 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. 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. Draft Policy 34 is therefore considered to have a number of positive sustainability benefits, including for maintaining and enhancing open space; providing play space; promoting ecological pathways and blue and green infrastructure networks; flood risk management and 'making space' for water; providing high quality sports and leisure facilities and equalities.					
<u>Medium beneficial effects (++) on</u> <ul style="list-style-type: none"> avoiding, reducing and managing all sources of flood risk taking account of climate change (Appraisal Objective 2) ; protecting and enhancing the quality of built design, townscape quality, local character and the Borough's historic environment (Appraisal Objective 11) 												
<u>Small beneficial effects (+) on</u> <ul style="list-style-type: none"> addressing the causes of climate change by minimising CO₂ emissions and promoting zero carbon standards in new development (Appraisal Objective 1) 												

	SA FRAMEWORK OBJECTIVES											
	(A) Environmental Sustainability				(B) Sustainable Economic Growth				(C) Sustainable Communities			
+ Small beneficial impact ++ Medium beneficial impact +++ Large beneficial impact X Adverse Impact ? Uncertain impact None/ neutral	(1) CLIMATE MITIGATION AND NET ZERO To address causes of climate change by minimising CO ₂ emissions and promoting zero carbon in new development	(2) FLOOD RISK AND WATER RESOURCES To avoid, reduce and manage all sources of flood risk to and from development taking account of climate change	(3) OPEN SPACE, GREENING & BNG To enhance provision and quality of Sutton's open environment, promote greening & biodiversity linkages and promote BNG	(4) SUSTAINABLE TRANSPORT, HEALTHY STREETS AND AIR QUALITY To reduce traffic, reduce congestion, local air pollution, promote sustainable transport and healthy streets	(5) TOWN CENTRES To enhance the vitality and viability and regeneration of Sutton Town Centre and town centres throughout Borough and promote access to community shopping facilities.	(6) SUSTAINABLE ECONOMIC GROWTH, LOCAL EMPLOYMENT EDUCATION & SKILLS To promote a strong, sustainable and high-skilled local economy	(7) URBAN REGENERATION & AREA RENEWAL To create world's leading life science district on the LCH site; promote Sutton Link and secure inward investment for area renewal	(8) GREEN ECONOMY DECENT ENERGY; & DECARBONISATION. To attract green business; promote 'circular' economy; promote decentralised energy & decarbonise social housing & buildings	(9) ACCESS TO HOUSING To meet the future local need for housing and affordable housing and the Borough's share of London's need	(10) SOCIAL AND COMMUNITY INFRASTRUCTURE To maintain and enhance good access to health, education, sports, leisure and other public amenities for Borough residents	(11) BUILT AND HISTORIC ENVIRONMENT To protect and enhance the quality of built design, townscape quality, local character and the Borough's historic environment	(12) EQUALITIES, & CLIMATE JUSTICE Avoid discrimination against equalities groups; promote climate justice, address deprivation; promote healthy & safe communities,

ISSUE 35: BLUE AND GREEN INFRASTRUCTURE - new policy

- (a) In seeking to build climate resilient communities, counteract the urban heat island effect and achieve multiple benefits for urban cooling, biodiversity net gain (BNG), SuDS, healthy streets, air quality and local amenity, all development proposals must incorporate urban greening measures as an integral part of the design and layout through measures such as, but not limited to, high-quality landscaping, planting, trees, biodiverse green roofs, rain gardens and other nature-based SuDS measures.
- (b) Where applicable, proposed developments must demonstrate an uplift in the Green Space Factor (GSF) score of at least +0.2 compared to the baseline score for the site. Proposed developments on greenfield sites must demonstrate a score of at least 0.5
- Preferred Option 1:** Green space factor (GSF) requirement applies to all new-build residential developments creating at least one dwelling and all major commercial developments.
- Option 2:** GSF requirement applies to major residential and commercial developments only
- (c) All planning applications must be accompanied by a baseline assessment of the development site, GSF calculations and associated plans showing the breakdown of existing surface types, hard and soft landscaping, planting, trees and boundary treatments together with information and further gsf calculations to demonstrate how urban greening measures have been incorporated as part of the landscaping strategy in order to achieve the minimum GSF scores set out in Part (b) above, the relevant biodiversity net gain (BNG) objectives for the site (Issue 37 on Biodiversity Net Gain) and the Council's minimum SuDS performance standards set out in Policy Issue 45
- (d) All proposed developments must incorporate a dry meadow extensive or semi-intensive biodiverse green roof where feasible or alternatively a blue roof. All planning applications which do not include a green must be supported by evidence to demonstrate why this is not technically feasible, commercially viable or consistent with accommodating on-site renewable energy in line with Local Plan Issue 4

PREFERRED OPTION 1: GSF for all new-build resi. developments creating at least one dwelling and all major commercial development	++	+++	+++	+++						+++	+++	+++
OPTION 2: GSF for major residential and commercial major developments only	+	++	++	+++						++	++	++

Draft Policy 35 on Blue and Green Infrastructure will have:

Large beneficial effects (+++) on

- avoiding, reducing and managing all sources of flood risk taking account of climate change (Appraisal Objective 2) ;
- protecting and enhancing the quality of Sutton's open environment, promoting urban greening (blue and green infrastructure), promoting ecological pathways and securing biodiversity net gain throughout the Borough (Appraisal Objective 3)
- reducing traffic levels, reducing congestion, cutting local air pollution, promoting active and sustainable modes of transport and promoting healthy streets (Appraisal Objective 4)
- maintaining and enhancing good access to health, education, sports, leisure and other public amenities for Borough residents (Appraisal Objective 10)
- protecting and enhancing the quality of built design, townscape quality, local character and the Borough's historic environment (Appraisal Objective 11)
- ensuring that the Local Plan does not discriminate against equalities target groups and promotes climate justice (Appraisal Objective 12)

Medium beneficial effects (++) on

- addressing the causes of climate change by minimising CO₂ emissions and promoting zero carbon standards in new development (Appraisal Objective 1)

ANALYSIS

This is 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 significantly positive benefits for a number of sustainability objectives. These include 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 matrix.

ISSUE 36: NATURE CONSERVATION SITES AND GREEN CORRIDORS - updates Policy 26 of Local Plan 2018

- (a) Proposed developments that create, enhance or conserve biodiversity and habitats, create ecological pathways and/or reduce areas of deficiency will be encouraged subject to other local plan policies. In particular, the Council will support proposed developments that contribute towards urban greening objectives and borough targets for habitat creation set out in Local Plan Policy 6 on 'Biodiversity and Habitats', the Council's Biodiversity Action Plan, Sutton's emerging Local Nature Recovery Strategy and Catchment Plans for the River Wandle and Beverley Brook:
- (b) Proposed developments will not be permitted (i) Within, adjacent to or in the vicinity of a Site of Importance for Nature Conservation (SINC) where there would be an adverse impact on the nature conservation value or integrity of the SINC unless the need for or the benefits of the proposed development clearly outweigh the harm or there are no reasonable alternative sites that would result in less harm (ii) within or adjacent to a Green Corridor where there would be an adverse impact on its function both as an ecological pathway and as part of the borough's wider green space network, unless the need for or the benefits of the development clearly outweigh the harm or there are no reasonable alternative sites that would result in less harm (iii) on back garden land where it is considered to be of local ecological value by the Council either individually or as part of a larger continuous street block; or (iv) where it is likely to adversely affect the integrity or biodiversity value of the Banstead Downs SSSI (site of special scientific interest) adjacent to the London Borough of Sutton.

For SINC boundaries and green corridors see the Local Plan Appendix 6 and Policies Map

DRAFT POLICY 36: Nature Conservation Sites and Green Corridors	++	++	+++	+++						++	+++	+++
LOCAL PLAN 2018: Policy 26	++	++	++	+++						++	+++	+++

Draft Policy 36 on Nature Conservation Sites and Green Corridors will have:

Large beneficial effects (+++) on

- protecting and enhancing the quality of Sutton's open environment, promoting urban greening (blue and green infrastructure), promoting ecological pathways and securing biodiversity net gain throughout the Borough (Appraisal Objective 3)
- reducing traffic levels, reducing congestion, cutting local air pollution, promoting active and sustainable modes of transport and promoting healthy streets (Appraisal Objective 4)
- protecting and enhancing the quality of built design, townscape quality, local character and the Borough's historic environment (Appraisal Objective 11)
- ensuring that the Local Plan does not discriminate against equalities target groups and promotes climate justice (Appraisal Objective 12)

Medium beneficial effects (++) on

- addressing the causes of climate change by minimising CO₂ emissions and promoting zero carbon standards in new development (Appraisal Objective 1)
- avoiding, reducing and managing all sources of flood risk taking account of climate change (Appraisal Objective 2) ;
- maintaining and enhancing good access to health, education, sports, leisure and other public amenities for Borough residents (Appraisal Objective 10)

ANALYSIS

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 (i) the nature conservation value or integrity of a SINC permitted (ii) the function of a green corridor as both as an ecological pathway and as part of the borough's wider green space network; or (iii) back garden land where it is considered to be of local ecological value, Draft Policy 36 on Nature Conservation Sites and Green Corridors has many beneficial sustainability impacts. The main benefits are in relation to habitats/ biodiversity net gain, urban greening, climate change adaptation/ cooling, local amenity and climate justice.

SA FRAMEWORK OBJECTIVES																																																																				
(A) Environmental Sustainability				(B) Sustainable Economic Growth				(C) Sustainable Communities																																																												
+ Small beneficial impact ++ Medium beneficial impact +++ Large beneficial impact X Adverse Impact ? Uncertain impact None/ neutral	(1) CLIMATE MITIGATION AND NET ZERO To address causes of climate change by minimising CO ₂ emissions and promoting zero carbon in new development	(2) FLOOD RISK AND WATER RESOURCES To avoid, reduce and manage all sources of flood risk to and from development taking account of climate change	(3) OPEN SPACE, GREENING & BNG To enhance provision and quality of Sutton's open environment, promote greening & biodiversity linkages and promote BNG	(4) SUSTAINABLE TRANSPORT, HEALTHY STREETS AND AIR QUALITY To reduce traffic, reduce congestion, local air pollution, promote sustainable transport and healthy streets	(5) TOWN CENTRES To enhance the vitality and viability and regeneration of Sutton Town Centre and town centres throughout Borough and promote access to community shopping facilities.	(6) SUSTAINABLE ECONOMIC GROWTH, LOCAL EMPLOYMENT EDUCATION & SKILLS To promote a strong, sustainable and high-skilled local economy	(7) URBAN REGENERATION & AREA RENEWAL To create world's leading life science district on the LCH site; promote Sutton Link and secure inward investment for area renewal	(8) GREEN ECONOMY DECENT ENERGY; & DECARBONISATION. To attract green business; promote 'circular' economy; promote decentralised energy & decarbonise social housing & buildings	(9) ACCESS TO HOUSING To meet the future local need for housing and affordable housing and the Borough's share of London's need	(10) SOCIAL AND COMMUNITY INFRASTRUCTURE To maintain and enhance good access to health, education, sports, leisure and other public amenities for Borough residents	(11) BUILT AND HISTORIC ENVIRONMENT To protect and enhance the quality of built design, townscape quality, local character and the Borough's historic environment	(12) EQUALITIES, & CLIMATE JUSTICE Avoid discrimination against equalities groups; promote climate justice, address deprivation; promote healthy & safe communities,																																																								
ISSUE 37: BIODIVERSITY NET GAIN - updates Policy 26 of Local Plan 2018																																																																				
<p>(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:</p> <p>(i) impacts less than 25m² of habitat or 5m of linear habitat on the existing site and does not impact a priority habitat;</p> <p>(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</p> <p>(iii) is a residential extension or otherwise classified as householder development.</p> <table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td style="width:25%;">Preferred Option 1: Set a 20% BNG target for all development sites within the borough.</td> <td style="width:25%;">Option 2: Set a 10% BNG target for all development sites within the borough.</td> <td style="width:25%;">Option 3: Set a 20% BNG target for development sites located in town centres and their surrounding areas of potential intensification (APIs) and within strategic industrial locations (SILs). Set a 10% BNG target for all other development sites within the remainder of the borough</td> <td style="width:25%;">Option 4: Where wider area-based BNG targets have been established by the Council in parts of the borough which are currently deficient or score zero biodiversity units (expressed in units per hectare), set the BNG site target accordingly in order to achieve the necessary uplift in biodiversity value</td> </tr> </table> <p>(b) All planning applications subject to the BNG requirement set out under part (a) must be accompanied by:</p> <p>(i) a statement as to whether the applicant believes that planning permission, if granted, would be subject to BNG;</p> <p>(ii) the pre-development biodiversity value of the site based on the Statutory Metric including the completed calculation tool and the publication date; and</p> <p>(iii) a plan showing on-site habitat existing on the date of submission including any irreplaceable habitat.</p> <p>(c) Where planning permission is granted, the Council will apply the standard biodiversity gain condition where relevant to require the submission and approval of a biodiversity gain plan prior to the commencement of the development. Biodiversity gain plans must (i) include a completed calculation tool for the approved development based on the Statutory Metric demonstrating that the appropriate BNG target will be met (ii) demonstrate that the government's mitigation hierarchy and biodiversity gain hierarchy have been followed (iii) support the aims of Sutton's Nature Recovery Strategy, any approved area-based targets set for achieving an uplift in biodiversity value and urban greening and address deficiencies in access to nature conservation sites where feasible (iv) demonstrate how BNG and urban greening objectives have been incorporated as an integral part of the development from the earliest stages of project planning and design (v) ensure that soft landscaping schemes consist of at least 80% native and of local provenance (by number and species type), with the remainder wildlife-friendly species and provide both species and structural diversity, to maximise ecological niches; and (vi) where it is not feasible to achieve the BNG target through on-site habitat creation, enhancement or restoration proposals, set out proposals in the following order of priority (a) deliver off-site habitat enhancements off-site on a borough site included on the national biodiversity gain sites register (b) make a financial contribution to a biodiversity tariff to be established by the Council; and (c) purchase statutory credits as a last resort and only if offsetting is not possible on Council owned land.</p> <p>(d) The Council will:</p> <p>(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;</p> <p>(ii) assess biodiversity gain plans on a case-by-case basis to determine the 'best ecological outcome';</p> <p>(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</p> <p>monitor the delivery of BNG across the borough and report every 5 years.</p> <table border="1" style="width:100%; border-collapse: collapse; text-align: center;"> <tr> <td style="width:15%;">PREFERRED OPTION 1: 20% target for all sites in borough.</td> <td style="width:15%;">++</td> <td style="width:15%;">+++</td> <td style="width:15%;">++</td> <td style="width:15%;"></td> <td style="width:15%;"></td> <td style="width:15%;"></td> <td style="width:15%;"></td> <td style="width:15%;"></td> <td style="width:15%;"></td> <td style="width:15%;"></td> <td style="width:15%;"></td> <td style="width:15%;"></td> </tr> <tr> <td>OPTION 2: 10% target for all sites in the borough</td> <td>+</td> <td>+</td> <td>+</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>OPTION 3: 20% target for town centres and APIs and within SILs. 10% elsewhere</td> <td>++</td> <td>++</td> <td>++</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>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),</td> <td>++?</td> <td>++?</td> <td>++?</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> </table> <p>Draft Policy 37 on Biodiversity Net Gain will have:</p> <p><u>Preferred Option 1: Large beneficial effects (+++)</u> <u>Option 3: Medium beneficial effects (++)</u> <u>Option 2: Small beneficial effects (+)</u> <u>Option 4: Uncertain beneficial effects (++) (depending on baseline information for biodiversity value for individual development sites), for</u></p> <ul style="list-style-type: none"> avoiding, reducing and managing all sources of flood risk taking account of climate change (Appraisal Objective 2) ; protecting and enhancing the quality of Sutton's open environment, promoting urban greening (blue and green infrastructure), promoting ecological pathways and securing biodiversity net gain throughout the Borough (Appraisal Objective 3) reducing traffic levels, reducing congestion, cutting local air pollution, promoting active and sustainable modes of transport and promoting healthy streets (Appraisal Objective 4) maintaining and enhancing good access to health, education, sports, leisure and other public amenities for Borough residents (Appraisal Objective 10) protecting and enhancing the quality of built design, townscape quality, local character and the Borough's historic environment (Appraisal Objective 11) ensuring that the Local Plan does not discriminate against equalities target groups and promotes climate justice (Appraisal Objective 12) <p>ANALYSIS All four alternative options set out under Policy issue 37 on Biodiversity Net Gain By are predicted to have strongly beneficial impacts on promoting biodiversity and habitats throughout the Borough, urban greening, flood risk management, air quality, residential amenity, local character, equalities and climate justice. 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.</p>													Preferred Option 1: Set a 20% BNG target for all development sites within the borough.	Option 2: Set a 10% BNG target for all development sites within the borough.	Option 3: Set a 20% BNG target for development sites located in town centres and their surrounding areas of potential intensification (APIs) and within strategic industrial locations (SILs). Set a 10% BNG target for all other development sites within the remainder of the borough	Option 4: Where wider area-based BNG targets have been established by the Council in parts of the borough which are currently deficient or score zero biodiversity units (expressed in units per hectare), set the BNG site target accordingly in order to achieve the necessary uplift in biodiversity value	PREFERRED OPTION 1: 20% target for all sites in borough.	++	+++	++										OPTION 2: 10% target for all sites in the borough	+	+	+										OPTION 3: 20% target for town centres and APIs and within SILs. 10% elsewhere	++	++	++										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),	++?	++?	++?									
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	SA FRAMEWORK OBJECTIVES											
	(A) Environmental Sustainability				(B) Sustainable Economic Growth				(C) Sustainable Communities			
+ Small beneficial impact ++ Medium beneficial impact +++ Large beneficial impact X Adverse Impact ? Uncertain impact None/ neutral	(1) CLIMATE MITIGATION AND NET ZERO To address causes of climate change by minimising CO ₂ emissions and promoting zero carbon in new development	(2) FLOOD RISK AND WATER RESOURCES To avoid, reduce and manage all sources of flood risk to and from development taking account of climate change	(3) OPEN SPACE, GREENING & BNG To enhance provision and quality of Sutton's open environment, promote greening & biodiversity linkages and promote BNG	(4) SUSTAINABLE TRANSPORT, HEALTHY STREETS AND AIR QUALITY To reduce traffic, reduce congestion, local air pollution, promote sustainable transport and healthy streets	(5) TOWN CENTRES To enhance the vitality and viability and regeneration of Sutton Town Centre and town centres throughout Borough and promote access to community shopping facilities.	(6) SUSTAINABLE ECONOMIC GROWTH, LOCAL EMPLOYMENT EDUCATION & SKILLS To promote a strong, sustainable and high-skilled local economy	(7) URBAN REGENERATION & AREA RENEWAL To create world's leading life science district on the LCH site; promote Sutton Link and secure inward investment for area renewal	(8) GREEN ECONOMY DECENT ENERGY; & DECARBONISATION. To attract green business; promote 'circular' economy; promote decentralised energy & decarbonise social housing & buildings	(9) ACCESS TO HOUSING To meet the future local need for housing and affordable housing and the Borough's share of London's need	(10) SOCIAL AND COMMUNITY INFRASTRUCTURE To maintain and enhance good access to health, education, sports, leisure and other public amenities for Borough residents	(11) BUILT AND HISTORIC ENVIRONMENT To protect and enhance the quality of built design, townscape quality, local character and the Borough's historic environment	(12) EQUALITIES, & CLIMATE JUSTICE Avoid discrimination against equalities groups; promote climate justice, address deprivation; promote healthy & safe communities,

ISSUE 38: CHARACTER AND DESIGN - updates Policy 28 of Local Plan 2018

Design-led approach to Development

(a) The Council will support development proposals that are design-led and respond to a site's character and context. All development proposals should demonstrate how the proposed capacity of the development has been informed by (i) a design-led approach that optimises the capacity of sites and ensures that development is of the most appropriate form and land use for the site (ii) the Council's Character Study (iii) the form and layout of the site, within its context, including appropriate scale, height and massing (iv) the requirements of London Plan Policy D1 and D3.

General Design Principles

(b) The Council will grant planning permission for new development, including new buildings, alterations and extensions, provided the new development (i) Is attractive, designed to the highest standard, especially with regard to architectural detailing, and uses high-quality materials; Respects the local context and responds to local character and heritage assets (ii) Is of a suitable scale, massing and height to the setting and context of the site and/or townscape and adequately preserves or enhances the prevailing local character (iii) Would not create canyon-like development, with no relief or set backs, especially along streets (vi) Seeks to improve an area of poor townscape character (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.

(c) Opportunities for the removal of poor townscape and its replacement by development of an improved quality and scale will be pursued.

Public Realm

(d) Public Realm proposals will be supported that provide (i) the most effective use of the site (ii) safe, attractive, uncluttered, co-ordinated public realm that enhances the setting of and spaces between buildings (iii) improved legibility, permeability and convenient access via direct routes for all users (but avoiding alleyways and back lanes) (iv) new or enhanced public space and green infrastructure (v) climate change adaptation measures such as sustainable urban drainage systems, urban shading and heat reduction measures (vi) good-quality construction materials and landscape design which is appropriate for its site and immediate locality (vii) for the removal of redundant or unsightly street furniture/clutter (viii) modestly-sized infrastructure cabinets in unobtrusive locations and places them below ground in conservation areas and adjacent to heritage assets (ix) pedestrian and cycle-priority shared environments which are not dominated by vehicles whether moving or parked (x) retains and enhances the heritage value of existing spaces.

Landscaping and Trees

(e) New development, where appropriate, should: (i) Make provision for suitable new planting, trees and boundary treatments, taking into account the future effects of climate change (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.

Advertisements

(g) The Council will not grant permission for advertisements that are detrimental to the visual quality of the borough or do not meet highway safety requirements. In particular, advertisements must respect the design of the building on which they are erected and the character and amenity of the surrounding area.

(h) All development will also be expected to comply with the guidance set out in the Council's Urban Design Guide SPD, Sutton Town Centre Public Realm Design Guide SPD or any successor document, including design codes.

DRAFT POLICY 38: Character And Design		++	+++	+++			++			++	+++	+++
LOCAL PLAN 2018: Policy 28		++	+++	+++			++			++	+++	+++

Draft Policy 38 on Character and Design will have:

Large beneficial effects (+++) on

- protecting and enhancing the quality of Sutton's open environment, promoting urban greening (blue and green infrastructure), promoting ecological pathways and securing biodiversity net gain throughout the Borough (Appraisal Objective 3)
- reducing traffic levels, reducing congestion, cutting local air pollution, promoting active and sustainable modes of transport and promoting healthy streets (Appraisal Objective 4)
- protecting and enhancing the quality of built design, townscape quality, local character and the Borough's historic environment (Appraisal Objective 11)
- ensuring that the Local Plan does not discriminate against equalities target groups and promotes climate justice (Appraisal Objective 12)

Medium beneficial effects (++) on

- avoiding, reducing and managing all sources of flood risk taking account of climate change (Appraisal Objective 2) ;
- promoting area renewal, implementing environmental improvements, supporting the life sciences and attracting investment in infrastructure and high-skilled jobs (Appraisal Objective 7)
- maintaining and enhancing good access to health, education, sports, leisure and other public amenities for Borough residents (Appraisal Objective 10)

ANALYSIS

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 the majority of sustainability objectives making up the Council's appraisal framework. Provided that this very wide-ranging policy is applied effectively through the development management process, key benefits will include maintaining and enhancing townscape quality and local character; enhancing residential amenity; protecting heritage assets; supporting Conservation Area objectives; creating enhanced public space and green infrastructure; promoting SuDS and creating climate resilient communities. This policy will also have benefits in terms of promoting sustainable and active modes of transport such as cycling and walking and reducing car dominance.

	SA FRAMEWORK OBJECTIVES											
	(A) Environmental Sustainability				(B) Sustainable Economic Growth				(C) Sustainable Communities			
+ Small beneficial impact ++ Medium beneficial impact +++ Large beneficial impact X Adverse Impact ? Uncertain impact None/ neutral	(1) CLIMATE MITIGATION AND NET ZERO To address causes of climate change by minimising CO ₂ emissions and promoting zero carbon in new development	(2) FLOOD RISK AND WATER RESOURCES To avoid, reduce and manage all sources of flood risk to and from development taking account of climate change	(3) OPEN SPACE, GREENING & BNG To enhance provision and quality of Sutton's open environment, promote greening & biodiversity linkages and promote BNG	(4) SUSTAINABLE TRANSPORT, HEALTHY STREETS AND AIR QUALITY To reduce traffic, reduce congestion, local air pollution, promote sustainable transport and healthy streets	(5) TOWN CENTRES To enhance the vitality and viability and regeneration of Sutton Town Centre and town centres throughout Borough and promote access to community shopping facilities.	(6) SUSTAINABLE ECONOMIC GROWTH, LOCAL EMPLOYMENT EDUCATION & SKILLS To promote a strong, sustainable and high-skilled local economy	(7) URBAN REGENERATION & AREA RENEWAL To create world's leading life science district on the LCH site; promote Sutton Link and secure inward investment for area renewal	(8) GREEN ECONOMY DECENT ENERGY; & DECARBONISATION. To attract green business; promote 'circular' economy; promote decentralised energy & decarbonise social housing & buildings	(9) ACCESS TO HOUSING To meet the future local need for housing and affordable housing and the Borough's share of London's need	(10) SOCIAL AND COMMUNITY INFRASTRUCTURE To maintain and enhance good access to health, education, sports, leisure and other public amenities for Borough residents	(11) BUILT AND HISTORIC ENVIRONMENT To protect and enhance the quality of built design, townscape quality, local character and the Borough's historic environment	(12) EQUALITIES, & CLIMATE JUSTICE Avoid discrimination against equalities groups; promote climate justice, address deprivation; promote healthy & safe communities,

ISSUE 39: TALL BUILDINGS - new stand-alone policy (currently covered in Policy 28 of the Local Plan 2018)

Definition of Tall Buildings in Sutton

(a) Buildings which are 21 metres or more, from the ground level to the uppermost part of the building are defined as tall buildings in Sutton.

Appropriate Locations for Tall Buildings

(b) Proposals for tall buildings, as defined in part (a), will only be appropriate in Areas of Taller Building Potential, as defined in the Local Plan Appendix and Policies Map, where the development would not result in any adverse visual, functional, environmental, and cumulative impacts.

(c) Proposals for tall buildings outside the Areas of Taller Building Potential will not be supported.

Appropriate Heights for Tall Buildings

(d) Proposals for tall buildings should not exceed the appropriate height range identified for each of the Areas of Taller Building Potential as defined in the Local Plan Appendix and Policies Map or relevant Site Allocation.

(e) Proposals for tall buildings must take into account: (i) the need for variation in heights within a particular development proposal and across different development proposals within an area (ii) the need to avoid harm to the significance of heritage assets, particularly the impact that tall building would have on the Sutton Town Centre Conservation Area. Buildings that have a High Street frontage must be of a similar height to neighbouring properties to preserve the 'human scale' on the High Street. (iii) the need to avoid harm to the areas of ecological importance, or the enjoyment of the borough's open spaces. (iv) impacts on daylight, sunlight, and overshadowing for neighbouring developments. (v) the need to maintain sky views from street level from within clusters of tall buildings.

Public Benefits and Affordable Housing

(f) All proposals for tall buildings must demonstrate how they provide significant public benefits, and in particular must meet the affordable housing requirements set out in the affordable housing policy, currently set out under Issue 14.

Tall Building Design Criteria

(g) Proposals for tall buildings will be supported where it is demonstrated that they meet the following design criteria:

- (i) Be of a height, scale, mass, volume, and orientation that is proportionate to its role and function and takes into account the character of the immediate context and its surroundings.
- (ii) Achieve exemplary architectural quality and innovative and sustainable building design, using robust, durable, attractive, and contextually appropriate materials throughout the building. Proposals should respond to the local character in the architectural design of the building
- (iii) Make a positive contribution to the quality of the local and wider townscape and skyline
- (iv) Demonstrate that the development does not adversely impact on the microclimate, including wind, overshadowing, daylight and sunlight, solar glare, and light pollution, and amenity of the application site and the surrounding area
- (v) Provide an adequate quantum of on site high-quality communal open space, child playspace areas and public realm (where residential uses are proposed), and where appropriate provide shared facilities at the ground floor level to encourage social cohesion and to promote health and well-being of occupants
- (vi) Maintain adequate distance between buildings to ensure a high-quality ground floor experience and enhanced residential environment.
- (vii) Present a human scale of development at street level and comprise an attractive and legible streetscape that takes into account the use of the public realm for a variety of users and includes active uses at ground floor level.
- (viii) Where ground floor non-residential uses are proposed, the public realm should be enhanced through the incorporation of public spaces, such as plazas at their entrance, unless it can be clearly demonstrated that such an approach would not be appropriate
- (ix) Sites which have existing through-routes, or are capable of accommodating through-routes, must ensure that such routes are maintained or provided to support ease of movement and connectivity
- (x) Demonstrate consideration of public safety requirements as part of the overall design, including the provision of safe evacuation routes and two staircases
- (xi) To not prejudice future development potential of adjacent/neighbouring buildings or plots.

Mid-rise Buildings

(h) Buildings which do not fall within the definition of a tall building as set out in Part A, but are 12 to 21 metres from the ground level to the top of the building will be considered to be mid-rise buildings.

(i) Proposals for mid-rise buildings will be supported in locations, as defined in the Local Plan Appendix and Policies Map, where the development would (i) Respond appropriately in height, scale and massing to existing buildings in the surrounding area, and protect or enhance heritage assets, including their settings (ii) Respect the scale, width and proportion of adjacent buildings, streets and local character, and avoid adverse effects on key characteristics, valued features and sensitivities with reference to the Council's draft Character Study (2024) (iii) Respond to surrounding architectural styles, avoid the creation of long homogeneous blocks of development and create active frontages at ground floor level (iv) Be located and designed in order to create a step down between the proposed development and buildings within the surrounding area (v) Not impact negatively on daylight, sunlight, and overshadowing for neighbouring developments.

(j) All development will also be expected to comply with the guidance set out in the Council's Urban Design Guide Supplementary Planning Document, Sutton Town Centre Public Realm Design Guide SPD or any successor document, including design codes.

DRAFT POLICY 39: Tall Buildings				++	++	++	++		++		++	+
LOCAL PLAN 2018: Policy 28 (part g)				++	++	++	+		++		++	+

Draft Policy 39 on Tall Buildings will have:

Medium beneficial effects (++) on

- reducing traffic levels, reducing congestion, cutting local air pollution, promoting active and sustainable modes of transport and promoting healthy streets (Appraisal Objective 4)
- enhancing the vitality and viability and regeneration of Sutton Town Centre and town centres and promoting access to community shopping facilities (Appraisal Objective 5);
- promoting economic growth and a strong, sustainable and high-skilled local economy (Appraisal Objective 6);
- helping to meet the future local need for housing and the Borough's share of London's need (Appraisal Objective 9)
- protecting and enhancing the quality of built design, townscape quality, local character and the Borough's historic environment (Appraisal Objective 11)
- ensuring that the Local Plan does not discriminate against equalities target groups and promotes climate justice (Appraisal Objective 12).

ANALYSIS

Draft Policy 39 on 'Tall Buildings' is a new stand-alone policy and not part of the current Character and Design Policy. While there is no significant change to the Policy itself, the London Cancer Hub (LCH) site is identified as suitable for tall buildings for the first time. The outcome of the appraisal identifies that Draft Policy 39 will have beneficial impacts on townscape quality and local character by ensuring the taller buildings are only supported within identified Areas of Taller Building Potential and where the proposed development would not result in any adverse visual, functional, environmental, and cumulative impacts. There will be further benefits for townscape quality, local character, health and well-being, the public realm, communal open space and health and well-being of occupants arising from a range of design criteria which all taller buildings will be expected to meet. At the same time, allowing for such developments within Areas of Taller Building Potential will help to contribute towards meeting Borough housing needs, and for affordable units in particular. Identifying the LCH as suitable for taller buildings will contribute to the planned regeneration and transformation of this site as a world-leading life sciences district. The above benefits are reflected in the scores awarded in the above appraisal table.

SA FRAMEWORK OBJECTIVES												
(A) Environmental Sustainability				(B) Sustainable Economic Growth					(C) Sustainable Communities			
	(1) CLIMATE MITIGATION AND NET ZERO To address causes of climate change by minimising CO ₂ emissions and promoting zero carbon in new development	(2) FLOOD RISK AND WATER RESOURCES To avoid, reduce and manage all sources of flood risk to and from development taking account of climate change	(3) OPEN SPACE, GREENING & BNG To enhance provision and quality of Sutton's open environment, promote greening & biodiversity linkages and promote BNG	(4) SUSTAINABLE TRANSPORT, HEALTHY STREETS AND AIR QUALITY To reduce traffic, reduce congestion, local air pollution, promote sustainable transport and healthy streets	(5) TOWN CENTRES To enhance the vitality and viability and regeneration of Sutton Town Centre and town centres throughout Borough and promote access to community shopping facilities.	(6) SUSTAINABLE ECONOMIC GROWTH, LOCAL EMPLOYMENT & EDUCATION & SKILLS To promote a strong, sustainable and high-skilled local economy	(7) URBAN REGENERATION & AREA RENEWAL To create world's leading life science district on the LCH site; promote Sutton Link and secure inward investment for area renewal	(8) GREEN ECONOMY DECENT ENERGY; & DECARBONISATION. To attract green business; promote 'circular' economy; promote decentralised energy & decarbonise social housing & buildings	(9) ACCESS TO HOUSING To meet the future local need for housing and affordable housing and the Borough's share of London's need	(10) SOCIAL AND COMMUNITY INFRASTRUCTURE To maintain and enhance good access to health, education, sports, leisure and other public amenities for Borough residents	(11) BUILT AND HISTORIC ENVIRONMENT To protect and enhance the quality of built design, townscape quality, local character and the Borough's historic environment	(12) EQUALITIES, & CLIMATE JUSTICE Avoid discrimination against equalities groups; promote climate justice, address deprivation; promote healthy & safe communities,
+ Small beneficial impact ++ Medium beneficial impact +++ Large beneficial impact X Adverse Impact ? Uncertain impact None/ neutral												
ISSUE 40: PROTECTING AMENITY- updates Policy 29 of Local Plan 2018												
<p>(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.</p> <p>(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 (v) Access is safe and secure and does not cause disturbances. (vi) Noise and vibration levels and times when such disturbances are likely to occur (vii) Odours, smoke, fumes, dust, litter accumulation, refuse collection/ storage and exterior lighting (viii) The effect of traffic movement to, from and within the site and car parking (ix) Microclimate (the climate of a very small or restricted area) (x) 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.</p> <p>(c) If the proposal can be made acceptable by mitigation measures, then the Council will seek these measures</p>												
DRAFT POLICY 40: Protecting Amenity												+++ +
LOCAL PLAN 2018: Policy 29												+++ +
Draft Policy 40 on Protecting Amenity will have							ANALYSIS Draft Policy 40 on Protecting Amenity will have impacts on townscape quality and local character by preventing developments which adversely residential amenity for those currently occupying adjoining or nearby properties, or has an unacceptable impact on the residents of the surrounding area and by taking a range of criteria into consideration when considering the potential impacts of a development on adjacent or neighbouring uses and by requiring mitigation measures to be put in place as appropriate and/or necessary.					
<p><u>Large beneficial effects (+++) on</u></p> <ul style="list-style-type: none"> protecting and enhancing the quality of built design, townscape quality, local character and the Borough's historic environment (Appraisal Objective 11) <p><u>Medium beneficial effects (++) on</u></p> <ul style="list-style-type: none"> ensuring that the Local Plan does not discriminate against equalities target groups and promotes climate justice (Appraisal Objective 12) 												
ISSUE 41: HERITAGE- updates Policy 30 of Local Plan 2018												
General												
<p>(a) The Council will conserve and, where practicable, enhance the borough's historic environment. This comprises: Listed Buildings and structures, Scheduled Monuments, Conservation Areas, Historic Parks and Gardens, Areas of Special Local Character, Locally Listed Buildings and undesignated archaeological remains.</p> <p>(b) Development that has an impact upon a heritage asset will be expected to conserve and, where practicable, enhance its significance. The Council will expect that new development integrates into the historic environment and will look for opportunities from new development affecting heritage assets and their settings to enhance or better reveal their significance.</p> <p>(c) Great weight will be given to conservation of Sutton's heritage assets. Any harm to the significance of a designated or non-designated heritage asset, or their loss, must be justified. Proposals will be weighed against (i) the public benefits of the proposal (ii) whether it has been demonstrated that all reasonable efforts have been made to sustain the existing use, find new uses or mitigate the extent of the harm to the significance of the asset (iii) whether the works proposed are the minimum required to secure the long-term beneficial use and retain the significance and conservation of the asset.</p> <p>(d) Proposals likely to affect the significance of a heritage asset, including the contribution made by its setting, should be accompanied by a description of its significance in sufficient detail to allow the potential impacts to be adequately assessed.</p>												
Listed Buildings and Structures												
<p>(e) The Council will (i) not permit the total or substantial demolition of a Listed Building or Structure unless exceptional circumstances are shown that outweigh the case for retention (ii) expect proposals for a change of use or alteration or extension to a Listed Building or Structure to have no adverse impact on those elements which contribute to the Listed Building or Structure's special architectural or historic interest and significance, including its setting (iii) not permit development which it considers would cause harm to the setting of a Listed Building or Structure unless the public benefits outweigh the harm.</p>												
Scheduled Monuments												
<p>(f) The Ancient Monuments and Archaeological Areas Act (1979) does not allow (i) the disturbance of or addition to a Schedule Ancient Monument by carrying out works without consent (ii) the reckless or deliberate damage to a Scheduled Ancient Monument (iii) the removal of an object without a licence from Historic England.</p>												
Conservation Areas												
<p>(g) The Council will (i) expect development within a Conservation Area to conserve and, where practicable, to enhance those elements which contribute to the Conservation Area's special character or appearance. These elements may include landscaped areas, gardens, trees, hedges and boundary treatments as well as the built form. In considering development proposals, consideration will be given to matters including height, scale, massing, materials, urban grain and layout, the public realm and views into and out of the Conservation Area (ii) not permit the total or substantial demolition of an unlisted building which makes a positive contribution to the character and appearance of a Conservation Area and, when in exceptional circumstances demolition is required, the replacement building will be expected to make the same or more of a positive contribution to the character and appearance of the Conservation Area (iii) expect development outside a Conservation Area but which would affect a Conservation Area to conserve and, where practicable, enhance those elements which contribute to the Conservation Area's special character or appearance.</p>												
Historic Parks and Gardens (both nationally and locally designated)												
<p>(h) The Council will (i) expect that development conserves and, where practicable, enhances Historic Parks and Gardens and their settings (ii) not permit development which harms the enjoyment, layout, design, character and appearance of Historic Parks and Gardens</p>												
Areas of Special Local Character												
<p>(i) The Council will (i) expect development within an Area of Special Local Character conserves and, where practicable, enhances those elements which contribute to the Area of Special Local Character's particular character or appearance. These elements may include landscaped areas, gardens, trees, hedges and boundary treatments as well as the built form (ii) expect development outside an Area of Special Local Character but which would affect an Area of Special Local Character to conserve and, where practicable, enhance those elements which contribute to the Area of Special Local Character's particular character or appearance. .</p>												
Locally Listed Buildings and Structures												
<p>(j) The Council will encourage the retention, repair and reuse of Locally Listed Buildings and Structures.</p>												
Archaeological Priority Areas												
<p>(k) The Council will (i) in consultation with the Greater London Archaeological Advisory Service, require the necessary level of investigation and recording for development proposals that affect, or have the potential to affect Sutton's archaeological heritage. Remains of archaeological importance, whether scheduled or not, should be protected in situ, or if this is not possible, excavated and removed as directed by the Greater London Archaeological Advisory Service (ii) expect the applicant to have sought pre-application advice from the Greater London Archaeological Advisory Service before submitting an archaeological evaluation</p> <p>(l) Where a scheme should be submitted for archaeological site-based survey and/or intervention, in addition to the method statement it will need to include analysis, publication, and archive deposition of the material and the records made, and for the public dissemination of the results to further understanding</p>												
DRAFT POLICY 41: Heritage												+++ +
LOCAL PLAN 2018: Policy 30												+++ +
Draft Policy 41 on Heritage will have							ANALYSIS Draft Policy 41 on Heritage will have significantly beneficial impacts in terms of protecting and, where relevant, enhancing the setting of all aspects of the Borough's historic environment. This comprises Listed Buildings and structures, Scheduled Monuments, Conservation Areas, Historic Parks and Gardens, Areas of Special Local Character, Locally Listed Buildings and undesignated archaeological remains. The detail is set out above in the wording of the policy itself and it is not considered necessary to repeat the analysis here for reasons of brevity.					
<p><u>Large beneficial effects (+++) on</u></p> <ul style="list-style-type: none"> protecting and enhancing the quality of built design, townscape quality, local character and the Borough's historic environment (Appraisal Objective 11) <p><u>Medium beneficial effects (++) on</u></p> <ul style="list-style-type: none"> ensuring that the Local Plan does not discriminate against equalities target groups and promotes climate justice (Appraisal Objective 12) 												

SA FRAMEWORK OBJECTIVES												
(A) Environmental Sustainability				(B) Sustainable Economic Growth					(C) Sustainable Communities			
+ Small beneficial impact ++ Medium beneficial impact +++ Large beneficial impact X Adverse Impact ? Uncertain impact None/ neutral	(1) CLIMATE MITIGATION AND NET ZERO To address causes of climate change by minimising CO ₂ emissions and promoting zero carbon in new development	(2) FLOOD RISK AND WATER RESOURCES To avoid, reduce and manage all sources of flood risk to and from development taking account of climate change	(3) OPEN SPACE, GREENING & BNG To enhance provision and quality of Sutton's open environment, promote greening & biodiversity linkages and promote BNG	(4) SUSTAINABLE TRANSPORT, HEALTHY STREETS AND AIR QUALITY To reduce traffic, reduce congestion, local air pollution, promote sustainable transport and healthy streets	(5) TOWN CENTRES To enhance the vitality and viability and regeneration of Sutton Town Centre and town centres throughout Borough and promote access to community shopping facilities.	(6) SUSTAINABLE ECONOMIC GROWTH, LOCAL EMPLOYMENT EDUCATION & SKILLS To promote a strong, sustainable and high-skilled local economy	(7) URBAN REGENERATION & AREA RENEWAL To create world's leading life science district on the LCH site; promote Sutton Link and secure inward investment for area renewal	(8) GREEN ECONOMY DECENT ENERGY; & DECARBONISATION. To attract green business; promote 'circular' economy; promote decentralised energy & decarbonise social housing & buildings	(9) ACCESS TO HOUSING To meet the future local need for housing and affordable housing and the Borough's share of London's need	(10) SOCIAL AND COMMUNITY INFRASTRUCTURE To maintain and enhance good access to health, education, sports, leisure and other public amenities for Borough residents	(11) BUILT AND HISTORIC ENVIRONMENT To protect and enhance the quality of built design, townscape quality, local character and the Borough's historic environment	(12) EQUALITIES, & CLIMATE JUSTICE Avoid discrimination against equalities groups; promote climate justice, address deprivation; promote healthy & safe communities,

ISSUE 42: CARBON AND ENERGY- updates Policy 31 of Local Plan 2018

Preferred Policy Option 1: Absolute energy performance targets

- Net Zero Carbon** All residential developments involving the creation of at least one self-contained dwelling and all non-residential developments > 1,000 m² GFA must be supported by an Energy Assessment and demonstrate net zero carbon standards in operation in line with the emerging UK industry definition.
- Use of gas boilers** No gas boilers or any other fossil fuels are permitted on-site.
- Heating demand** Space heating demand for all buildings is limited to <15kWh/m² per year.
- Energy use intensity (EUI)** Energy use intensity (EUI) standards are set for the following different types of residential and non-residential buildings: Terraced house: EUI < 35 kWh/m² per year; low-rise apartment building: EUI < 35 kWh/m² per year; mid-rise apartment building: EUI < 35 kWh/m² per year; high-rise apartment building: EUI < 35 kWh/m² per year; office building: EUI < 70 kWh/m² per year; primary school building: EUI < 65 kWh/m² per year; industrial building: EUI < 35 kWh/m² per year; hotel EUI: < 160 kWh/m² per year;
- Renewable energy generation** Where feasible, on-site renewable energy generation must match EUI or be greater than >35 kWh/m² per year to achieve a balance with energy use.
- Embodied carbon** Upfront embodied carbon associated with demolition and building materials used for construction must be considered.
- Thermal bridging** Assured energy performance is required (e.g. 'accredited construction details' for minimising thermal bridging).
- Energy offsetting** Energy offsetting is used as a last resort in order to achieve net zero carbon, rather than carbon offsetting.

Policy Option 2: Reducing CO₂ emissions compared to Part L 2021

- Percentage reduction compared to Part L 2021** Takes forward the approach followed by Policy SI 2 of the London Plan, the Mayor's updated Energy Assessment Guidance 2022, the current Sutton Local Plan 2018 and by most London boroughs by requiring a percentage on-site reduction in regulated CO₂ emissions for the proposed building compared to a 'notional' Part L 2021 compliant building.
- Calculation of baseline emissions and use of SAP/SBEM** Requires baseline emissions or the Target Emission Rate (TER) for the Part L compliant notional building and the Dwelling or Building Emission Rate (DER or BER) to be calculated using the latest Standard Assessment Procedure (SAP) or Simplified Building Energy Model (SBEM) software for residential and non-residential buildings respectively.
- On-site emissions reduction targets against Part L 2021:** Sets on-site emissions reduction targets for the following different types of residential and non-residential buildings based on the recommendations of the Delivering Net Zero Study 2023: 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.
- Fabric energy efficiency (step 1: be lean)** Requires a 10% reduction through fabric energy efficiency measures alone (step 1: be lean) for major residential and a 15% reduction for non-residential developments in line with the Mayor's Energy Assessment Guidance 2022;
- Carbon offsetting** Requires the emissions reduction shortfall to be offset via a payment into the Council's carbon offset fund (as secured by a legal agreement) priced at £95 per tonne over 30 years to fund equivalent carbon reduction measures elsewhere.
- Exclusion of unregulated emissions** Excludes 'unregulated' emissions from embodied and whole-life carbon and relies significantly on carbon offsetting to achieve zero carbon.

Policy principles common to Preferred Policy Option 1 and Policy Option 2

- All residential and non-residential developments must minimise on-site CO₂ emissions through application of the Mayor's energy hierarchy (be lean; be clean; be green; be seen).
- All major residential and non-residential developments located within a Heat Network Priority Area identified by the Mayor and/or a Decentralised Energy Opportunity Area identified by the Council must be served by a communal or site-wide low carbon and low-temperature heating system;
- All proposed site-wide or communal heating systems located within a Heat Network Priority Area and/or a Decentralised Energy Opportunity Area must be designed to connect to local existing or planned heat networks and be served by zero-emission or local secondary heat sources in line with the Council's decentralised energy (DE) protocol (see Appendix 10 Schedule 10.A(i));
- All householder developments such as residential extensions, loft conversions and outbuildings are exempt from the net zero carbon requirement;
- Simplified energy assessment reporting requirements are set for single dwellings and minor non-residential developments under 1,000 m² GIA;
- The zero carbon requirement applies to changes of use, conversions and major refurbishments as well as to new builds;
- A whole life carbon (WLC) assessment must be undertaken for major developments in accordance with Mayoral Guidance on WLC Assessments 2020;
- All major commercial developments must achieve an 'Excellent' rating under the Building Research Establishment Environmental Assessment Method (BREEAM).

PREFERRED OPTION 1: Absolute Energy Targets	+++	++		++		++		+++			+?	+++
OPTION 2: Reducing Emissions On Part L 2021	++	+		+		+		++			+?	++
LOCAL PLAN 2018: Policy 31	+	+		+?		+?		+			+?	+

Preferred Policy Option 1: Absolute Energy Performance Targets will have

Large beneficial effects (+++) on

- addressing the causes of climate change by minimising CO₂ emissions and promoting zero carbon standards in new development (Appraisal Objective 1)
- attracting green business and jobs to the Borough; promote the 'circular' economy (Appraisal Objective 8)
- ensuring that the Local Plan does not discriminate against equalities target groups and promotes climate justice (Appraisal Objective 12)

Medium beneficial effects (++) on

- avoiding, reducing and managing all sources of flood risk taking account of climate change (Appraisal Objective 2);
- reducing traffic levels, reducing congestion, cutting local air pollution, promoting active and sustainable modes of transport and promoting healthy streets (Appraisal Objective 4)
- promoting economic growth and a strong, sustainable and high-skilled local economy (Appraisal Objective 6);

Policy Option 2: Reducing CO₂ Emissions Compared to Part L 2021

Medium beneficial effects (++) on

- addressing the causes of climate change by minimising CO₂ emissions and promoting zero carbon standards in new development (Appraisal Objective 1)
- attracting green business and jobs to the Borough; promote the 'circular' economy (Appraisal Objective 8)
- ensuring that the Local Plan does not discriminate against equalities target groups and promotes climate justice (Appraisal Objective 12)

Smaller beneficial effects (++) on

- avoiding, reducing and managing all sources of flood risk taking account of climate change (Appraisal Objective 2);
- reducing traffic levels, reducing congestion, cutting local air pollution, promoting active and sustainable modes of transport and promoting healthy streets (Appraisal Objective 4)
- promoting economic growth and a strong, sustainable and high-skilled local economy (Appraisal Objective 6);

ANALYSIS

Both Preferred Policy Option 1 (Absolute Energy Performance Targets) and Policy Option 2: Reducing CO₂ Emissions Compared to Part L 2021 are assessed as having significantly greater benefits in terms of addressing the causes of climate change and reducing carbon dioxide (CO₂) 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.

Although carbon offsetting is still included a mechanism to ensure that 'net zero' targets are achieved in line with the Mayor's Environment Strategy and Sutton's Climate Emergency Action Plan, there is a greater emphasis on minimising on-site emissions through fabric energy efficiency and other demand reduction measures; securing the efficient supply of energy through decentralised and secondary heat sources and through promoting on-site renewable energy generation e.g. under Option 2, the percentage targets below Part L 2021 go well beyond the current 35% target set in both the London Plan and the Local Plan 2018. However it is considered that the Preferred Option 1 (Absolute Energy Performance Targets) is likely to be much 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 (informed by a robust evidence base for most of the common development types), 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.

SA FRAMEWORK OBJECTIVES												
(A) Environmental Sustainability				(B) Sustainable Economic Growth					(C) Sustainable Communities			
	(1) CLIMATE MITIGATION AND NET ZERO To address causes of climate change by minimising CO ₂ emissions and promoting zero carbon in new development	(2) FLOOD RISK AND WATER RESOURCES To avoid, reduce and manage all sources of flood risk to and from development taking account of climate change	(3) OPEN SPACE, GREENING & BNG To enhance provision and quality of Sutton's open environment, promote greening & biodiversity linkages and promote BNG	(4) SUSTAINABLE TRANSPORT, HEALTHY STREETS AND AIR QUALITY To reduce traffic, reduce congestion, local air pollution, promote sustainable transport and healthy streets	(5) TOWN CENTRES To enhance the vitality and viability and regeneration of Sutton Town Centre and town centres throughout Borough and promote access to community shopping facilities.	(6) SUSTAINABLE ECONOMIC GROWTH, LOCAL EMPLOYMENT EDUCATION & SKILLS To promote a strong, sustainable and high-skilled local economy	(7) URBAN REGENERATION & AREA RENEWAL To create world's leading life science district on the LCH site; promote Sutton Link and secure inward investment for area renewal	(8) GREEN ECONOMY DECENT ENERGY; & DECARBONISATION. To attract green business; promote 'circular' economy; promote decentralised energy & decarbonise social housing & buildings	(9) ACCESS TO HOUSING To meet the future local need for housing and affordable housing and the Borough's share of London's need	(10) SOCIAL AND COMMUNITY INFRASTRUCTURE To maintain and enhance good access to health, education, sports, leisure and other public amenities for Borough residents	(11) BUILT AND HISTORIC ENVIRONMENT To protect and enhance the quality of built design, townscape quality, local character and the Borough's historic environment	(12) EQUALITIES, & CLIMATE JUSTICE Avoid discrimination against equalities groups; promote climate justice, address deprivation; promote healthy & safe communities,
+ Small beneficial impact ++ Medium beneficial impact +++ Large beneficial impact X Adverse Impact ? Uncertain impact None/ neutral												
ISSUE 43: OVERHEATING AND COOLING - updates Policy 33 of Local Plan 2018												
<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>												
DRAFT POLICY 43: Overheating and Cooling	++	+++	+++	+++				+++			+++	+++
LOCAL PLAN 2018: Policy 33	+	++	++	++				++			++	++
<p>Draft Policy 43 on Overheating and Cooling will have:</p> <p><u>Large beneficial effects (+++) on</u></p> <ul style="list-style-type: none"> avoiding, reducing and managing all sources of flood risk taking account of climate change (Appraisal Objective 2) ; protecting and enhancing the quality of Sutton's open environment, promoting urban greening, promoting ecological pathways and securing biodiversity net gain (Appraisal Objective 3) reducing traffic levels, reducing congestion, cutting local air pollution, promoting active and sustainable modes of transport and promoting healthy streets (Appraisal Objective 4) attracting green business and jobs to the Borough; promote the 'circular' economy (Appraisal Objective 8) protecting and enhancing the quality of built design, townscape quality, local character and the Borough's historic environment (Appraisal Objective 11) ensuring that the Local Plan does not discriminate against equalities target groups and promotes climate justice (Appraisal Objective 12) <p><u>Medium beneficial effects (++) on</u></p> <ul style="list-style-type: none"> addressing the causes of climate change by minimising CO₂ emissions and promoting zero carbon standards in new development (Appraisal Objective 1) 							<p>ANALYSIS</p> <p>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, this is a new policy which is more fully aligned with Mayoral Energy Assessment Guidance and current best practice.</p>					
ISSUE 44: FLOOD RISK MANAGEMENT AND RESILIENCE - updates Policy 32 (a) of Local Plan 2018												
<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 25m² 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>												
DRAFT POLICY 44: Flood Risk Management & Resilience		+++	+++	+++				++	++	++	+++	+++
LOCAL PLAN 2018: Policy 32a		+++	+++	++				++	++	++	+++	+++
<p>Draft Policy 44 on Flood Risk Management and Resilience will have:</p> <p><u>Large beneficial effects (+++) on</u></p> <ul style="list-style-type: none"> avoiding, reducing and managing all sources of flood risk taking account of climate change (Appraisal Objective 2) ; protecting and enhancing the quality of Sutton's open environment, promoting urban greening (blue and green infrastructure), promoting ecological pathways and securing biodiversity net gain throughout the Borough (Appraisal Objective 3) reducing traffic levels, reducing congestion, cutting local air pollution, promoting active and sustainable modes of transport and promoting healthy streets (Appraisal Objective 4) ensuring that the Local Plan does not discriminate against equalities target groups and promotes climate justice (Appraisal Objective 12) <p><u>Medium beneficial effects (++) on</u></p> <ul style="list-style-type: none"> helping to meet the future local need for housing and the Borough's share of London's need (Appraisal Objective 9) maintaining and enhancing good access to health, education, sports, leisure and other public amenities for Borough residents (Appraisal Objective 10) protecting and enhancing the quality of built design, townscape quality, local character and the Borough's historic environment (Appraisal Objective 11) 							<p>ANALYSIS</p> <p>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).</p>					

	SA FRAMEWORK OBJECTIVES											
	(A) Environmental Sustainability				(B) Sustainable Economic Growth				(C) Sustainable Communities			
+ Small beneficial impact ++ Medium beneficial impact +++ Large beneficial impact X Adverse Impact ? Uncertain impact None/ neutral	(1) CLIMATE MITIGATION AND NET ZERO To address causes of climate change by minimising CO ₂ emissions and promoting zero carbon in new development	(2) FLOOD RISK AND WATER RESOURCES To avoid, reduce and manage all sources of flood risk to and from development taking account of climate change	(3) OPEN SPACE, GREENING & BNG To enhance provision and quality of Sutton's open environment, promote greening & biodiversity linkages and promote BNG	(4) SUSTAINABLE TRANSPORT, HEALTHY STREETS AND AIR QUALITY To reduce traffic, reduce congestion, local air pollution, promote sustainable transport and healthy streets	(5) TOWN CENTRES To enhance the vitality and viability and regeneration of Sutton Town Centre and town centres throughout Borough and promote access to community shopping facilities.	(6) SUSTAINABLE ECONOMIC GROWTH, LOCAL EMPLOYMENT EDUCATION & SKILLS To promote a strong, sustainable and high-skilled local economy	(7) URBAN REGENERATION & AREA RENEWAL To create world's leading life science district on the LCH site; promote Sutton Link and secure inward investment for area renewal	(8) GREEN ECONOMY DECENT ENERGY; & DECARBONISATION. To attract green business; promote 'circular' economy; promote decentralised energy & decarbonise social housing & buildings	(9) ACCESS TO HOUSING To meet the future local need for housing and affordable housing and the Borough's share of London's need	(10) SOCIAL AND COMMUNITY INFRASTRUCTURE To maintain and enhance good access to health, education, sports, leisure and other public amenities for Borough residents	(11) BUILT AND HISTORIC ENVIRONMENT To protect and enhance the quality of built design, townscape quality, local character and the Borough's historic environment	(12) EQUALITIES, & CLIMATE JUSTICE Avoid discrimination against equalities groups; promote climate justice, address deprivation; promote healthy & safe communities,

ISSUE 45: SUSTAINABLE URBAN DRAINAGE (SuDS) - updates Policy 32 (b) of Local Plan 2018

(a) All proposed residential and commercial developments involving a net increase in building footprint, including major refurbishments, changes of use and residential conversions, must incorporate effective sustainable drainage (SuDS) measures as part of the design and layout of the development in order to manage surface water run-off as close to its source as possible and achieve the following minimum performance standards in accordance with the Mayor's drainage hierarchy (i) For greenfield sites, ensure that peak run-off rates for all storm events up to and including the 1 in 100 year rainfall event (plus climate change) never exceed greenfield run-off rates for the same event. (ii) For previously developed sites, aim to ensure that peak run-off rates for all storm events up to and including the 1 in 100 year rainfall event (plus climate change) achieve greenfield run-off rates for the same event, unless it can be demonstrated that all opportunities to minimise final site run-off, as close as reasonably practicable to greenfield runoff rates, have been taken in line with the Mayor's drainage hierarchy (iii) Ensure that the site drainage strategy can contain the 1 in 30 year event (plus climate change) without flooding and that any flooding occurring between the 1 in 30 and 1 in 100 year event (plus climate change) will be safely contained on site (including any run-off from neighbouring land).

(b) All planning applications involving the creation of (i) at least one net additional dwelling (ii) at least 1,000m² net additional commercial floorspace; or (iii) a residential extension located within an area of surface water flood risk and for which Government Standing Advice is applicable, must be accompanied by details of the proposed SuDS strategy prepared by an appropriately qualified professional, either as part of a site specific flood risk assessment (FRA) or as a separate document. As a minimum, submitted SuDS strategies must include: (i) Details of each SuDS measure and a site plan showing the proposed layout of the site drainage scheme. All drawings to be 'final drawings' not 'preliminary' or 'draft' unless further details are to be submitted via discharge of condition (ii) Evidence to show how the Mayor's drainage hierarchy has been applied (iii) Confirmation of permission to connect any discharge points into an open watercourse or sewer network. (iv) How blue and green infrastructure and other nature-based SuDS solutions have been considered; and how the use of impermeable paving has been avoided (v) Surface water calculations to demonstrate that the Council's minimum SuDS performance standards in Part (a) will be met. All major development proposals must also be accompanied by a completed Sutton Drainage Assessment Form (DAF) (vi) Where relevant, the outcome of infiltration testing to Building Research Establishment (BRE) Digest 365 standards or equivalent. (vii) Details of how each SuDS measure will be managed and maintained throughout its lifetime, including arrangements for adoption (viii) Exceedance flow paths for surface water for events greater than the 1 in 100 year event (plus climate change) (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'.

For surface water flooding extents, surface water catchments and identified surface water flooding hotspots see the Local Plan Appendix and Policies Map.

DRAFT POLICY 45: SuDS		+++	+++	+++					++	++	++	+++
LOCAL PLAN 2018: Policy 32b		+++	+++	++					++	++	++	+++

Draft Policy 45 on SuDS will have:
Large beneficial effects (+++) on

- avoiding, reducing and managing all sources of flood risk taking account of climate change (Appraisal Objective 2) ;
- protecting and enhancing the quality of Sutton's open environment, promoting urban greening (blue and green infrastructure), promoting ecological pathways and securing biodiversity net gain throughout the Borough (Appraisal Objective 3)
- reducing traffic levels, reducing congestion, cutting local air pollution, promoting active and sustainable modes of transport and promoting healthy streets (Appraisal Objective 4)
- ensuring that the Local Plan does not discriminate against equalities target groups and promotes climate justice (Appraisal Objective 12)

Medium beneficial effects (++) on

- helping to meet the future local need for housing and the Borough's share of London's need (Appraisal Objective 9)
- maintaining and enhancing good access to health, education, sports, leisure and other public amenities for Borough residents (Appraisal Objective 10)
- protecting and enhancing the quality of built design, townscape quality, local character and the Borough's historic environment (Appraisal Objective 11)

ANALYSIS
 Draft Policy 45 on SuDS 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).

ISSUE 46: BASEMENTS - new policy

(a) The Council will not permit proposed self-contained basement dwellings or new basements forming part of a residential extension within Environment Agency Fluvial Flood Zones 3a or 3b.

(b) Proposed self-contained basement dwellings located within EA Fluvial Flood Zone 2 and/or within surface water flood zones 3a or 3b as defined in Sutton's Strategic Flood Risk Assessment (SFRA) must demonstrate compliance with the sequential test based on Government vulnerability classifications and flood zone compatibility guidelines.

(c) Where it is not possible for a proposed self-contained basement dwelling to be located within areas at a lower risk of flooding, the following criteria must be demonstrated in line with the Government's 'exceptions test' (i) provision of wider sustainability benefits that outweigh the flood risk; and (ii) safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, reducing flood risk overall.

(d) All proposed self-contained basement dwellings or new basements forming part of a residential extension must (i) have internal access and egress to a higher floor situated above the design flood level (1 in 100 year fluvial event plus climate change) which can be utilised for emergency evacuation (ii) have access thresholds 300mm above the design flood level (iii) avoid the introduction of vents or light wells that could allow water inundation or ensure that these have thresholds raised above the design flood level.

(e) All proposed self-contained basement dwellings or new basements forming part of a residential extension must be accompanied by a basement impact assessment (BIA) prepared by a 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.

For Environment Agency Flood Zones see the Local Plan Appendix and Policies Map.

DRAFT POLICY 46: BASEMENTS		++	++						+			++
LOCAL PLAN 2018: NO POLICY		X	X						X			X

Draft Policy 46 on Basements will have:
Medium beneficial effects (++) on

- avoiding, reducing and managing all sources of flood risk taking account of climate change (Appraisal Objective 2) ;
- protecting and enhancing the quality of Sutton's open environment, promoting urban greening (blue and green infrastructure), promoting ecological pathways and securing biodiversity net gain throughout the Borough (Appraisal Objective 3)
- ensuring that the Local Plan does not discriminate against equalities target groups and promotes climate justice (Appraisal Objective 12)

Small beneficial effects (+) on

- helping to meet the future local need for housing and the Borough's share of London's need (Appraisal Objective 9)

ANALYSIS
 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.

	SA FRAMEWORK OBJECTIVES											
	(A) Environmental Sustainability				(B) Sustainable Economic Growth				(C) Sustainable Communities			
+ Small beneficial impact ++ Medium beneficial impact +++ Large beneficial impact X Adverse Impact ? Uncertain impact None/ neutral	(1) CLIMATE MITIGATION AND NET ZERO To address causes of climate change by minimising CO ₂ emissions and promoting zero carbon in new development	(2) FLOOD RISK AND WATER RESOURCES To avoid, reduce and manage all sources of flood risk to and from development taking account of climate change	(3) OPEN SPACE, GREENING & BNG To enhance provision and quality of Sutton's open environment, promote greening & biodiversity linkages and promote BNG	(4) SUSTAINABLE TRANSPORT, HEALTHY STREETS AND AIR QUALITY To reduce traffic, reduce congestion, local air pollution, promote sustainable transport and healthy streets	(5) TOWN CENTRES To enhance the vitality and viability and regeneration of Sutton Town Centre and town centres throughout Borough and promote access to community shopping facilities.	(6) SUSTAINABLE ECONOMIC GROWTH, LOCAL EMPLOYMENT EDUCATION & SKILLS To promote a strong, sustainable and high-skilled local economy	(7) URBAN REGENERATION & AREA RENEWAL To create world's leading life science district on the LCH site; promote Sutton Link and secure inward investment for area renewal	(8) GREEN ECONOMY DECENT ENERGY; & DECARBONISATION. To attract green business; promote 'circular' economy; promote decentralised energy & decarbonise social housing & buildings	(9) ACCESS TO HOUSING To meet the future local need for housing and affordable housing and the Borough's share of London's need	(10) SOCIAL AND COMMUNITY INFRASTRUCTURE To maintain and enhance good access to health, education, sports, leisure and other public amenities for Borough residents	(11) BUILT AND HISTORIC ENVIRONMENT To protect and enhance the quality of built design, townscape quality, local character and the Borough's historic environment	(12) EQUALITIES, & CLIMATE JUSTICE Avoid discrimination against equalities groups; promote climate justice, address deprivation; promote healthy & safe communities,

ISSUE 47: AIR QUALITY- updates Policy 34 (parts d, e and f) of Local Plan 2018

- (a) As a minimum, all developments must demonstrate that the proposed use and any additional traffic movements likely to be generated it will not lead to a further deterioration of existing poor air quality; create any new areas that exceed national air quality objectives and/or World Health Organisation guidelines for nitrogen dioxide (NO₂) or particulates (PM10 and PM2.5) ; or create an unacceptable risk of high levels of exposure to poor air quality.
- (b) All development proposals must be at least 'Air Quality Neutral' with respect to NO₂ emissions and particulates (PM10 and PM2.5) as defined by the Mayor's Air Quality Neutral LPG 2023 as amended and demonstrate through the preparation of an AQN assessment that both of the following Mayoral benchmarks will be met:
 - the Building Emissions Benchmarks (BEB) in Table 3.1 of the LPG covering emissions arising from equipment used to supply heat and energy to the buildings;
 - the Transport Emissions Benchmark (TEB) in Table 4.1 of the LPG – emissions from private vehicles travelling to and from the development.
- (c) Minor development proposals incorporating new heating systems will be assumed to meet the BEB if the proposed heating system is a heat pump or other zero-emission heat source; the new heating system includes one or more individual gas boilers with NO_x emissions rated at less than 40 mg/kWh; and/or the development is connecting to an existing heat network. Major development proposals which meet the Mayor's definition of 'car-free' and minor developments which do not exceed the maximum parking standards set out in Policies T6 and T6.1 to T6.5 of the London Plan 2021 will be assumed to meet the TEB.
- (d) Each of the following development types must demonstrate compliance with the Mayor's Air Quality Positive benchmarks in line with the Mayor's Air Quality Positive LPG

<p>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</p> <ul style="list-style-type: none"> • All planning applications which are 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; • All major development proposals located within Air Quality Focus areas. 	<p>Policy Option 2 - Air Quality Positive standards for large-scale developments only</p> <ul style="list-style-type: none"> • All planning applications which are referable to the Mayor • All large-scale proposals requiring Environmental Impact Assessment (EIA) • All large scale developments which are the subject of a planning brief; and
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- (e) All major planning applications for major residential or commercial developments together with all minor developments located in designated Air Quality Focus Areas and which do not fall within the scope of Part (c) of this Policy, must be accompanied by a full Air Quality Assessment, which identifies
 - the most significant sources of existing air pollution in the area and constraints;
 - proposed design measures to minimise polluting emissions, improve air quality and reduce exposure, particularly for vulnerable groups;
 - an assessment of the impacts on local air pollution and on receptors resulting from demolition and/or construction in line with Policy 43f on 'Construction Impacts';
 - an assessment of the impacts on local air pollution and on future occupants of the development including from fixed plant, such as boilers, emergency generators, mobile machinery where relevant and expected transport-related sources;
 - cumulative impacts from other committed developments in the vicinity
 - demonstrate that the relevant BEB and TEB benchmarks for NO₂ and particulates set out in the Mayor's Air Quality Neutral or Air Quality Positive LPG as appropriate.
- (f) All mitigation and design measures necessary to enable a proposed development to achieve the Mayor's 'Air Quality Neutral' or 'Air Quality Positive' criteria as appropriate should be carried out on-site. Off-site measures may be acceptable, provided that equivalent air quality benefits are demonstrated in the area affected by the development

PREFERRED OPTION 1: Air Quality Positive standards for large-scale developments and in Air Quality Focus Areas.	++			+++	++			++			+++
OPTION 2: Air Quality Positive standards for large-scale developments only	+			++	+			+			++

- Draft Policy 47 Preferred Option 1 - Air Quality Positive standards for large-scale developments and in Air Quality Focus Areas will have:**
- Large beneficial effects (+++) on
- reducing traffic levels, reducing congestion, cutting local air pollution, promoting active and sustainable modes of transport and promoting healthy streets (Appraisal Objective 4)
 - ensuring that the Local Plan does not discriminate against equalities target groups and promotes climate justice (Appraisal Objective 12)
- Medium beneficial effects (++) on
- addressing the causes of climate change by minimising CO₂ emissions and promoting zero carbon standards in new development (Appraisal Objective 1)
 - attracting green business and jobs to the Borough; promote the 'circular' economy (Appraisal Objective 8)
- Draft Policy 47 Option 2 - Air Quality Positive standards for large-scale developments only will have:**
- Large beneficial effects (+++) on
- reducing traffic levels, reducing congestion, cutting local air pollution, promoting active and sustainable modes of transport and promoting healthy streets (Appraisal Objective 4)
 - ensuring that the Local Plan does not discriminate against equalities target groups and promotes climate justice (Appraisal Objective 12)
- Medium beneficial effects (++) on
- addressing the causes of climate change by minimising CO₂ emissions and promoting zero carbon standards in new development (Appraisal Objective 1)
 - attracting green business and jobs to the Borough; promote the 'circular' economy (Appraisal Objective 8)

ANALYSIS

Draft Policy 47 on Air Quality 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 NO₂ 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 Option 1 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. This is reflected in the scores awarded in the SA.

SA FRAMEWORK OBJECTIVES												
(A) Environmental Sustainability				(B) Sustainable Economic Growth				(C) Sustainable Communities				
	(1) CLIMATE MITIGATION AND NET ZERO To address causes of climate change by minimising CO ₂ emissions and promoting zero carbon in new development	(2) FLOOD RISK AND WATER RESOURCES To avoid, reduce and manage all sources of flood risk to and from development taking account of climate change	(3) OPEN SPACE, GREENING & BNG To enhance provision and quality of Sutton's open environment, promote greening & biodiversity linkages and promote BNG	(4) SUSTAINABLE TRANSPORT, HEALTHY STREETS AND AIR QUALITY To reduce traffic, reduce congestion, local air pollution, promote sustainable transport and healthy streets	(5) TOWN CENTRES To enhance the vitality and viability and regeneration of Sutton Town Centre and town centres throughout Borough and promote access to community shopping facilities.	(6) SUSTAINABLE ECONOMIC GROWTH, LOCAL EMPLOYMENT EDUCATION & SKILLS To promote a strong, sustainable and high-skilled local economy	(7) URBAN REGENERATION & AREA RENEWAL To create world's leading life science district on the LCH site; promote Sutton Link and secure inward investment for area renewal	(8) GREEN ECONOMY DECENT ENERGY; & DECARBONISATION. To attract green business; promote 'circular' economy; promote decentralised energy & de-carbonise social housing & buildings	(9) ACCESS TO HOUSING To meet the future local need for housing and affordable housing and the Borough's share of London's need	(10) SOCIAL AND COMMUNITY INFRASTRUCTURE To maintain and enhance good access to health, education, sports, leisure and other public amenities for Borough residents	(11) BUILT AND HISTORIC ENVIRONMENT To protect and enhance the quality of built design, townscape quality, local character and the Borough's historic environment	(12) EQUALITIES, & CLIMATE JUSTICE Avoid discrimination against equalities groups; promote climate justice, address deprivation; promote healthy & safe communities,
+ Small beneficial impact ++ Medium beneficial impact +++ Large beneficial impact X Adverse Impact ? Uncertain impact None/ neutral												
ISSUE 48: CONTAMINATED LAND - updates Policy 34 (parts g, h and i) of Local Plan 2018												
<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>												
DRAFT POLICY 48: Contaminated Land				++								++
LOCAL PLAN 2018: Policy 34				++								++
Draft Policy 48 on Contaminated Land will have:							ANALYSIS					
Medium beneficial effects (++) on							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.					
<ul style="list-style-type: none"> reducing pollution and soil contamination (Appraisal Objective 4.5) ensuring that the Local Plan does not discriminate against equalities target groups (Appraisal Objective 12) 												
ISSUE 49: NOISE AND VIBRATION - updates Policy 34 (parts j and k) of Local Plan 2018												
<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>												
DRAFT POLICY 49: Noise and Vibration				++							++	++
LOCAL PLAN 2018: Policy 34				++							++	++
Draft Policy 49 on Noise and Vibration will have:							ANALYSIS					
Medium beneficial effects (++) on							Draft Policy 49 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.					
<ul style="list-style-type: none"> reducing noise pollution and promoting healthy streets (Appraisal Objective 4.3) protecting and enhancing the quality of built design, townscape quality, local character and the Borough's historic environment (Appraisal Objective 11) ensuring that the Local Plan does not discriminate against equalities target groups (Appraisal Objective 12) 												
ISSUE 50: LIGHT POLLUTION - updates Policy 34 (parts l and m) of Local Plan 2018												
<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>												
DRAFT POLICY 50: Light Pollution				++							++	++
LOCAL PLAN 2018: Policy 34 - part				++							++	++
Draft Policy 50 on Light Pollution will have:							ANALYSIS					
Medium beneficial effects (++) on							Draft Policy 50 on Light Pollution carries forward the relevant part of Policy 34 in the current Sutton Local Plan 2018 dealing with soil contamination without any significant changes.					
<ul style="list-style-type: none"> reducing light pollution and promoting healthy streets (Appraisal Objective 4.3) protecting and enhancing the quality of built design, townscape quality, local character and the Borough's historic environment (Appraisal Objective 11) ensuring that the Local Plan does not discriminate against equalities target groups (Appraisal Objective 12) 												

SA FRAMEWORK OBJECTIVES												
(A) Environmental Sustainability				(B) Sustainable Economic Growth					(C) Sustainable Communities			
	(1) CLIMATE MITIGATION AND NET ZERO To address causes of climate change by minimising CO ₂ emissions and promoting zero carbon in new development	(2) FLOOD RISK AND WATER RESOURCES To avoid, reduce and manage all sources of flood risk to and from development taking account of climate change	(3) OPEN SPACE, GREENING & BNG To enhance provision and quality of Sutton's open environment, promote greening & biodiversity linkages and promote BNG	(4) SUSTAINABLE TRANSPORT, HEALTHY STREETS AND AIR QUALITY To reduce traffic, reduce congestion, local air pollution, promote sustainable transport and healthy streets	(5) TOWN CENTRES To enhance the vitality and viability and regeneration of Sutton Town Centre and town centres throughout Borough and promote access to community shopping facilities.	(6) SUSTAINABLE ECONOMIC GROWTH, LOCAL EMPLOYMENT EDUCATION & SKILLS To promote a strong, sustainable and high-skilled local economy	(7) URBAN REGENERATION & AREA RENEWAL To create world's leading life science district on the LCH site; promote Sutton Link and secure inward investment for area renewal	(8) GREEN ECONOMY DECENT ENERGY; & DECARBONISATION. To attract green business; promote 'circular' economy; promote decentralised energy & decarbonise social housing & buildings	(9) ACCESS TO HOUSING To meet the future local need for housing and affordable housing and the Borough's share of London's need	(10) SOCIAL AND COMMUNITY INFRASTRUCTURE To maintain and enhance good access to health, education, sports, leisure and other public amenities for Borough residents	(11) BUILT AND HISTORIC ENVIRONMENT To protect and enhance the quality of built design, townscape quality, local character and the Borough's historic environment	(12) EQUALITIES, & CLIMATE JUSTICE Avoid discrimination against equalities groups; promote climate justice, address deprivation; promote healthy & safe communities,
+ Small beneficial impact ++ Medium beneficial impact +++ Large beneficial impact X Adverse Impact ? Uncertain impact None/ neutral												
ISSUE 51: CONSTRUCTION IMPACTS- updates Policy 34 (parts n and o) of Local Plan 2018												
<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 (CO₂) 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"> a commitment to prepare an Air Quality and Dust Management Plan (AQDMP) for Council approval prior to commencement identify and summarise the risk to human health, quality of life and the natural environment from demolition, earthworks, construction and trackout activities; identify the risk category of the site and recommended emissions control measures <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>												
DRAFT POLICY 51: Construction Impacts				+++							+++	+++
LOCAL PLAN 2018: Policy 34 - part				+++							+++	+++
Draft Policy 51 on Construction Impacts will have:							ANALYSIS					
<p>Large beneficial effects (+++) on</p> <ul style="list-style-type: none"> reducing adverse impacts of air pollution, dust, odour, noise, vibration, water pollution, soil contamination, carbon dioxide (CO₂) emissions and biodiversity on nearby sensitive uses (Appraisal Objective 4.1-4.5) protecting and enhancing the quality of built design, townscape quality, local character and the Borough's historic environment (Appraisal Objective 11) ensuring that the Local Plan does not discriminate against equalities target groups (Appraisal Objective 12) 							<p>Draft Policy 51 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.</p>					
ISSUE 52: TRANSPORT PROPOSALS - updates Policy 35 of Local Plan 2018												
<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>												
DRAFT POLICY 52: Transport Proposals	++		+++	+++	+++	++	+++		++	+++		+++
LOCAL PLAN 2018: Policy 35	++		++	++	++	++	++		+	++		++
Draft Policy 52 on Transport Proposals will have:							ANALYSIS					
<p>Large beneficial effects (+++) on</p> <ul style="list-style-type: none"> reducing traffic levels, reducing congestion, cutting local air pollution, promoting active and sustainable modes of transport and promoting healthy streets (Appraisal Objective 4) enhancing the vitality and viability and regeneration of Sutton Town Centre and town centres and promoting access to community shopping facilities (Appraisal Objective 5); promoting economic growth and a strong, sustainable and high-skilled local economy (Appraisal Objective 6); promoting area renewal, implementing environmental improvements, supporting the life sciences and attracting investment in infrastructure and high-skilled jobs (Appraisal Objective 7) attracting green business and jobs to the Borough; promote the 'circular' economy (Appraisal Objective 8) helping to meet the future local need for housing and the Borough's share of London's need (Appraisal Objective 9) maintaining and enhancing good access to health, education, sports, leisure and other public amenities for Borough residents (Appraisal Objective 10) protecting and enhancing the quality of built design, townscape quality, local character and the Borough's historic environment (Appraisal Objective 11) ensuring that the Local Plan does not discriminate against equalities target groups and promotes climate justice (Appraisal Objective 12) <p>Medium beneficial effects (++) on</p> <ul style="list-style-type: none"> addressing the causes of climate change by minimising CO₂ emissions and promoting zero carbon standards in new development (Appraisal Objective 1) helping to meet the future local need for housing and the Borough's share of London's need (Appraisal Objective 9) 							<p>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.</p>					

SA FRAMEWORK OBJECTIVES												
(A) Environmental Sustainability				(B) Sustainable Economic Growth					(C) Sustainable Communities			
	(1) CLIMATE MITIGATION AND NET ZERO To address causes of climate change by minimising CO ₂ emissions and promoting zero carbon in new development	(2) FLOOD RISK AND WATER RESOURCES To avoid, reduce and manage all sources of flood risk to and from development taking account of climate change	(3) OPEN SPACE, GREENING & BNG To enhance provision and quality of Sutton's open environment, promote greening & biodiversity linkages and promote BNG	(4) SUSTAINABLE TRANSPORT, HEALTHY STREETS AND AIR QUALITY To reduce traffic, reduce congestion, local air pollution, promote sustainable transport and healthy streets	(5) TOWN CENTRES To enhance the vitality and viability and regeneration of Sutton Town Centre and town centres throughout Borough and promote access to community shopping facilities.	(6) SUSTAINABLE ECONOMIC GROWTH, LOCAL EMPLOYMENT EDUCATION & SKILLS To promote a strong, sustainable and high-skilled local economy	(7) URBAN REGENERATION & AREA RENEWAL To create world's leading life science district on the LCH site; promote Sutton Link and secure inward investment for area renewal	(8) GREEN ECONOMY DECENT ENERGY; & DECARBONISATION. To attract green business; promote 'circular' economy; promote decentralised energy & de-carbonise social housing & buildings	(9) ACCESS TO HOUSING To meet the future local need for housing and affordable housing and the Borough's share of London's need	(10) SOCIAL AND COMMUNITY INFRASTRUCTURE To maintain and enhance good access to health, education, sports, leisure and other public amenities for Borough residents	(11) BUILT AND HISTORIC ENVIRONMENT To protect and enhance the quality of built design, townscape quality, local character and the Borough's historic environment	(12) EQUALITIES, & CLIMATE JUSTICE Avoid discrimination against equalities groups; promote climate justice, address deprivation; promote healthy & safe communities,
+ Small beneficial impact ++ Medium beneficial impact +++ Large beneficial impact X Adverse Impact ? Uncertain impact None/ neutral												

ISSUE 53: TRANSPORT IMPACTS - updates Policy 36 of Local Plan 2018

Development Proposals and Construction (a) Development proposals must ensure impacts on the transport network are mitigated and avoided. This will be achieved by ensuring that (i) impact to the transport network is reduced by promoting active and sustainable travel. (ii) new developments do not limit future options for future strategic or sustainable transport schemes. (iii) environmental impacts are reduced, including reducing congestion, emissions, improving air quality and public health. (iv) Development proposals that will have a significant impact on traffic congestion on the highway network, and/or the capacity and function of the transport network, will be required to contribute to and deliver appropriate supporting transport infrastructure and/or effective mitigation measures, including off-site where needed, through Section 106 and/or Section 278 agreements. **(b)** Major development proposals and any development that is likely to have a significant impact on the transport network will be required as part of the planning application to submit a Transport Assessment or Transport Statement, and/or Travel Plan, in accordance with London Plan Policy T4 and the planning guidelines contained within Appendix C of the Sutton Sustainable Transport Strategy SPD. Transport Assessments and/or Transport Statements should focus on embedding the Healthy Streets Approach within and around new developments **(c)** Development proposals that are likely to impact on the local transport network during construction, and which are expected to result in local closures/restrictions and/or significant numbers of vehicle trips for goods or materials during construction, will also be required to submit a Construction Logistics Plan. This should demonstrate how impact on the transport network and the amenity of local residents and functioning of existing businesses will be avoided, remedied or mitigated. **(d)** Development proposals will be required to demonstrate that proposals will not result in any detrimental impact on road safety. **(e)** Development proposals will be required to support the delivery of, and safeguard land required for, future strategic transport schemes, as well as protect and enhance existing transport infrastructure. Proposals that would prevent the delivery of future strategic transport schemes will not be supported. **(f)** The Council will not grant planning permission unless the full potential impact of any development is considered as above, together with any transport improvements considered necessary by the Council to overcome any adverse impacts of the development.

Sustainable Delivery, Servicing, and Consolidation (a) 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)** 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 **(c)** 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.

DRAFT POLICY 53: Transport Impacts	++		+++	+++	+++	++	+++		++	+++		+++
LOCAL PLAN 2018: Policy 36	++		++	++	++	++	++		+	++		++

Draft Policy 53 on Transport Impacts will have:

Large beneficial effects (+++) on

- reducing traffic levels, reducing congestion, cutting local air pollution, promoting active and sustainable modes of transport and promoting healthy streets (Appraisal Objective 4)
- enhancing the vitality and viability and regeneration of Sutton Town Centre and town centres and promoting access to community shopping facilities (Appraisal Objective 5);
- promoting economic growth and a strong, sustainable and high-skilled local economy (Appraisal Objective 6);
- promoting area renewal, implementing environmental improvements, supporting the life sciences and attracting investment in infrastructure and high-skilled jobs (Appraisal Objective 7)
- attracting green business and jobs to the Borough; promote the 'circular' economy (Appraisal Objective 8)
- helping to meet the future local need for housing and the Borough's share of London's need (Appraisal Objective 9)
- maintaining and enhancing good access to health, education, sports, leisure and other public amenities for Borough residents (Appraisal Objective 10)
- protecting and enhancing the quality of built design, townscape quality, local character and the Borough's historic environment (Appraisal Objective 11)
- ensuring that the Local Plan does not discriminate against equalities target groups and promotes climate justice (Appraisal Objective 12)

Medium beneficial effects (++) on

- addressing the causes of climate change by minimising CO₂ emissions and promoting zero carbon standards in new development (Appraisal Objective 1)
- helping to meet the future local need for housing and the Borough's share of London's need (Appraisal Objective 9)

ANALYSIS

Draft Policy 53 on Transport Impacts will have significantly beneficial impacts on the majority of sustainability criteria making up the Council's appraisal framework by promoting active and sustainable modes of travel; reducing congestion, 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

ISSUE 55: INFRASTRUCTURE DELIVERY - updates Policy 38 of Local Plan 2018

(a) The Council will seek planning contributions to ensure the necessary infrastructure to support the Local Plan is delivered, by (i) charging CIL on developments in accordance with the CIL Regulations (2010, as amended). (ii) seeking planning obligations to secure provision of affordable housing and to ensure that all new development meets on and off site requirements to mitigate the impacts of development where necessary and appropriate, having regard to any relevant policies or supplementary planning documents (iii) requiring viability assessments to be submitted as part of a planning application to ensure that appropriate and acceptable levels of contributions are secured, where proposals do not meet policy requirements or propose to deliver planning obligations **(b)** The Council will work with relevant providers to ensure that the necessary infrastructure is secured to support growth in the borough over the Plan period (2024-2041).

Infrastructure Assessments (c) The Council will require development proposals to be accompanied by a site specific infrastructure assessment for major developments. These assessments will determine the additional infrastructure that will need to be created to support that proposal.. and sets out how these requirements will be delivered

DRAFT POLICY 55: Infrastructure	+	+	+	+++	++	++	+++	+	++	++		+++
LOCAL PLAN 2018: Policy 38	+	+	+	+++	++	++	+++	+	++	++		+++

Draft Policy 55 on Infrastructure Delivery will have:

Large beneficial effects (+++) on

- reducing traffic levels, reducing congestion, cutting local air pollution, promoting active and sustainable modes of transport and promoting healthy streets (Appraisal Objective 4)
- attracting green business and jobs to the Borough; promote the 'circular' economy (Appraisal Objective 8)
- ensuring that the Local Plan does not discriminate against equalities target groups and promotes climate justice (Appraisal Objective 12)

Medium beneficial effects (++) on

- enhancing the vitality and viability and regeneration of Sutton Town Centre and town centres and promoting access to community shopping facilities (Appraisal Objective 5);
- promoting economic growth and a strong, sustainable and high-skilled local economy (Appraisal Objective 6);
- helping to meet the future local need for housing and the Borough's share of London's need (Appraisal Objective 9)
- maintaining and enhancing good access to health, education, sports, leisure and other public amenities for Borough residents (Appraisal Objective 10)

Small beneficial effects (+) on

- addressing the causes of climate change by minimising CO₂ emissions and promoting zero carbon standards in new development (Appraisal Objective 1)
- avoiding, reducing and managing all sources of flood risk taking account of climate change (Appraisal Objective 2) ;
- protecting and enhancing the quality of Sutton's open environment, promoting urban greening (blue and green infrastructure), promoting ecological pathways and securing biodiversity net gain throughout the Borough (Appraisal Objective 3)
- attracting green business and jobs to the Borough; promote the 'circular' economy (Appraisal Objective 8)

ANALYSIS

Draft Policy 55 on Infrastructure Delivery will have significantly beneficial impacts on the majority of objectives making up the Council's sustainability appraisal framework by ensuring that the necessary infrastructure is secured to support housing delivery and sustainable economic growth in the borough over the Plan period

SA FRAMEWORK OBJECTIVES												
	(A) Environmental Sustainability				(B) Sustainable Economic Growth				(C) Sustainable Communities			
+ Small beneficial impact ++ Medium beneficial impact +++ Large beneficial impact X Adverse Impact ? Uncertain impact None/ neutral	(1) CLIMATE MITIGATION AND NET ZERO To address causes of climate change by minimising CO ₂ emissions and promoting zero carbon in new development	(2) FLOOD RISK AND WATER RESOURCES To avoid, reduce and manage all sources of flood risk to and from development taking account of climate change	(3) OPEN SPACE, GREENING & BNG To enhance provision and quality of Sutton's open environment, promote greening & biodiversity linkages and promote BNG	(4) SUSTAINABLE TRANSPORT, HEALTHY STREETS AND AIR QUALITY To reduce traffic, reduce congestion, local air pollution, promote sustainable transport and healthy streets	(5) TOWN CENTRES To enhance the vitality and viability and regeneration of Sutton Town Centre and town centres throughout Borough and promote access to community shopping facilities.	(6) SUSTAINABLE ECONOMIC GROWTH, LOCAL EMPLOYMENT EDUCATION & SKILLS To promote a strong, sustainable and high-skilled local economy	(7) URBAN REGENERATION & AREA RENEWAL To create world's leading life science district on the LCH site; promote Sutton Link and secure inward investment for area renewal	(8) GREEN ECONOMY DECENT ENERGY; & DECARBONISATION. To attract green business; promote 'circular' economy; promote decentralised energy & decarbonise social housing & buildings	(9) ACCESS TO HOUSING To meet the future local need for housing and affordable housing and the Borough's share of London's need	(10) SOCIAL AND COMMUNITY INFRASTRUCTURE To maintain and enhance good access to health, education, sports, leisure and other public amenities for Borough residents	(11) BUILT AND HISTORIC ENVIRONMENT To protect and enhance the quality of built design, townscape quality, local character and the Borough's historic environment	(12) EQUALITIES, & CLIMATE JUSTICE Avoid discrimination against equalities groups; promote climate justice, address deprivation; promote healthy & safe communities,
ISSUE 56: MONITORING												
(a) The Council will monitor and review the effectiveness of the Local Plan's policies in achieving the strategic objectives of the policies and related objectives and targets set out at local and regional level every five years. Conclusions from the first review will be published no later than five years from the adoption date of the Local Plan through the Council's Authority Monitoring Report.												
(b) The Council will have particular regard to the following factors when reviewing policies within the Local Plan and determining whether or not relevant policies require updating (i) The Monitoring Framework (ii) The latest Authority Monitoring Report, including reported progress against the requirements for the planned delivery of development and infrastructure (iii) Conformity of policies with national planning policy (iv) Changes to local circumstances (including a change in local housing need) (v) Significant local, regional or national economic changes; and (vi) Progress in plan-making activities by other local authorities and the Mayor of London.												
DRAFT POLICY 56: Monitoring	+	+	+	+	+	+	+	+	+	+	+	+
LOCAL PLAN 2018: Policy 38	+	+	+	+	+	+	+	+	+	+	+	+
Draft Policy 56 on Monitoring will have small beneficial effects (+) on all sustainability objectives making up the Council's sustainability appraisal framework							ANALYSIS The Council will monitor the implementation and effectiveness of all Local Plan policies against their stated objectives (i.e. targets set out in the Plan) and against the sustainability objectives making up the Council's sustainability appraisal framework. Reporting will be via Sutton's Authority Monitoring Report (AMR)					

11. SEQUENTIAL TESTING OF POTENTIAL SITE ALLOCATIONS

Background to Sequential Test

11.1 The National Planning Policy Framework (NPPF, December 2023) requires that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere. Local Plans should therefore apply a sequential, risk-based approach to the location of development to avoid flood risk to people and property and manage any residual risk, taking account of climate change, by applying the 'sequential test' and if necessary, applying the 'exception test' to all potential development sites in line with technical guidelines¹ set out in Government Planning Practice Guidance (PPG).

11.2 As set out in Section 3 of this SA Report on 'Other Relevant Plans', a comprehensive update to the flood risk and coastal change section was introduced in August 2022. Given the key role of the SA process (together with the strategic flood risk assessment or SFRA) in demonstrating that all site allocations proposed for inclusion in the Local Plan are in compliance with the 'sequential' and 'exception' tests, some of the key changes² are outlined below

- the 'design flood' now explicitly includes an allowance for climate change, and also accounts for surface water flood risk (Para 002);
- the starting point for the functional floodplain (i.e. Zone 3b) is now 3.3% AEP and not 5% as previously; and
- the lifetime of non-residential development is now set at 75 years (Para 006).
- more clarity is provided on when the sequential test needs to be applied and about 'minor' (Para 027);
- key terms are defined e.g. 'reasonably available', 'wider sustainable development objectives';
- roles and responsibilities are more clearly defined with particular emphasis on local planning authorities to choose the area of search and consider if the sequential test is passed (Para 029);
- encouragement for more cross-boundary working (Para 025);
- clearer guidance on how should the Sequential Test be applied to planning applications (Para 027);
- greater clarity about when it is appropriate to move onto the Exception Test (Para 031);
- suggested approaches are included to improve certainty and efficiency, e.g. prepare guidance on areas of search and a register of ranked sites; and guidance on who is responsible for deciding if a planning application passes the Sequential Test? (Para 029).

11.3 The NPPF emphasises the importance of SFRAs and their roles in planning and flood risk, stating the following

"Strategic policies should be informed by a strategic flood risk assessment, and should manage flood risk from all sources. They should consider cumulative impacts in, or affecting, local areas susceptible to flooding, and take account of advice from the Environment Agency and other relevant flood risk management authorities, such as lead local flood authorities and internal drainage boards."

11.4 The purpose of the sequential test is to ensure that sites at little or no risk of flooding are developed in preference to sites at higher risk, taking the vulnerability of the proposed use into account. This will help avoid the development of sites that are inappropriate on flood risk grounds. The sequential approach should be applied at all levels and scales of the planning process, both for sites between flood zones and where a site has to be located in a higher risk zone, within the extent of that flood zone by locating the more vulnerable elements of the development in the areas of lowest risk. All opportunities to locate new developments in reasonably available areas of little or no flood risk should be explored, prior to any decision to locate them in areas of higher risk.

11.5 If, following application of the sequential test, it is not possible, consistent with wider sustainability objectives, for the development to be located in zones with a lower probability of flooding, the exception test can be applied if appropriate. For the Exception Test to be passed:

¹ formerly set out in the Government's Planning Policy Statement on Development and Flood Risk (PPS25) (now cancelled)

² further details of changes to NPPG relating to flood risk and coastal change are set out in an Environment Agency Briefing Note available at <https://www.susdrain.org/files/News/Flood-risk-and-coastal-change-PPG-update-briefing-note-v2.pdf>

- it must be demonstrated that the development provides wider sustainability benefits to the community that outweigh flood risk; and
- a site-specific flood risk assessment (FRA) must demonstrate that 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. Both elements of the test will have to be passed for development to be allocated or permitted.

Strategic Flood Risk Assessment (SFRA) - Outcome of initial site screening

11.6 The outcome of initial site screening undertaken by Metis consultants as part of the SFRA Level 1 and Level 2 work is set out in Table 11.1. For each of the potential site allocations put forward in Sutton's Local Plan 'Issues and Preferred Options' (Regulation 18) document the Table sets out the following key information:

- sites requiring sequential test;
- sites requiring exceptions test; and
- sites requiring further assessment at SFRA Level 2 stage

Table 11.1: Site Assessment and Screening of Potential Site Allocations included in the Local Plan Issues and Preferred Options (Regulation 18) document (July 2024)

SFRA ID	Name	Proposed Use	Vulnerability Classification	Site Area (ha)	FZ2 (% of site area)	FZ3a (% of site area)	FZ3b (% of site area)	Main River 35% Climate Change (% of site area)	1 in 100yr RoFSW Extent (% of site area)	1 in 1000yr RoFSW Extent (% of site area)	Surface Water Flood Risk Increase due to Climate Change (not currently in 1 in 100yr RoFSW, but in 1 in 1000yr RoFSW)	Groundwater Susceptibility Banding	Sewer Flooding?	Sequential Test Required?	Exception Test Required?	Level 2 SFRA Recommended?
DC1	The Grove House, Grove Park, High Street, Carshalton, SM5 3AL	Residential	More vulnerable	0.08	0.00	0.00	0.00	0.00	0.00	0.00	NO	>= 75%	YES	NO	NO	NO
DC2	Charles Cryer Theatre, High Street, Carshalton SM5 3BB	Community (Class F2) Restaurant (Class E)	Less vulnerable	0.07	0.00	0.00	0.00	0.00	0.00	0.00	NO	>= 75%	YES	NO	NO	NO
DC3	Former Fox & Hounds Public House, 41 High Street, Carshalton, SM5 3BB	Residential Public House (SG) Class E	More vulnerable	0.14	0.00	0.00	0.00	0.00	0.00	0.00	NO	>= 75%	YES	NO	NO	NO
DC4	Greenview House, 5 Manor Road Wallington SM6 0BW	Class E Education (Class F) Residential	More vulnerable	0.10	0.00	0.00	0.00	0.00	10.50	24.21	NO	>= 75%	YES	NO	NO	NO
DC5	Former HSS Hire, 53 Malden Road Cheam SM3 8QW	Residential	More vulnerable	0.14	0.00	0.00	0.00	0.00	0.00	0.00	NO	>= 25% <50%	YES	NO	NO	NO
DC6	Tesco Esso Express (with petrol station), 50 Malden Road, Cheam SM3 8HB	Residential Class E	More vulnerable	0.15	0.00	0.00	0.00	0.00	0.00	0.00	NO	>= 25% <50%	YES	NO	NO	NO
DC7	Cheam Library, Church Road, Cheam SM3 8QH	Library (Class F1) Health (Class E) Other (Sui Generis) Residential Public Car Parking (SG)	More vulnerable	0.30	0.00	0.00	0.00	0.00	0.01	0.37	NO	>= 25% <50%	YES	NO	NO	NO
DC8	Anne Boleyn House 9 - 13 Ewell Road Cheam SM3 8BZ	Residential	More vulnerable	0.10	0.00	0.00	0.00	0.00	8.07	13.60	NO	>= 25% <50%	YES	NO	NO	NO
DC9	Oceantech House, Station Approach, Cheam, SM2 7AU	Residential	More vulnerable	0.60	0.00	0.00	0.00	0.00	0.02	14.42	NO	>= 25% <50%	YES	NO	NO	NO
DC10	Peaches Court Sports Club, Peaches Close, Cheam SM2 7BJ	Residential Community (Class F2) Car Parking (Sui Generis)	More vulnerable	0.18	0.00	0.00	0.00	0.00	94.68	100.00	NO	>= 25% <50%	YES	NO	NO	NO
DC11	Former HG Wells Public House, 101 Cheam Common Rd, Worcester Park, KT4 8TA	Residential Public House (SG)	More vulnerable	0.20	0.00	0.00	0.00	0.00	0.00	6.75	YES	< 25%	YES	NO	NO	NO
DC12	Resource Centre, Covey Road / London Road SM3 9DL	Residential Community (Class F2) Class E (Offices)	More vulnerable	0.37	0.00	0.00	0.00	0.00	0.00	2.04	YES	< 25%	YES	NO	NO	NO
DC13	Tesco Esso Express (with petrol station), 668 London Road, Sutton, SM3 9BY	Residential Class E Petrol Station (SG)	More vulnerable	0.15	0.00	0.00	0.00	0.00	0.00	0.00	NO	< 25%	YES	NO	NO	NO
DC14	Sainsbury's, 566 London Road, Sutton, SM3 9AA	Residential Class E	More vulnerable	2.90	0.00	0.00	0.00	0.00	1.99	2.98	NO	< 25%	YES	NO	NO	NO
DC15	Former Victoria House, 388 Malden Road, Cheam, SM3 8HY	Residential Class E Class F	More vulnerable	0.28	0.00	0.00	0.00	0.00	0.00	0.00	NO	< 25%	YES	NO	NO	NO
DC16	Cheam Leisure Centre, Malden Road / Priory Crescent SM3 8EP	Community (Class F2) Health (Class E)	More vulnerable	1.28	0.00	0.00	0.00	0.00	6.27	20.37	NO	N/A	YES	NO	NO	NO
DC17	Hill House, Bishopsford Road, Rosehill SM4 6BL	Community (Class F2) Residential	More vulnerable	1.05	0.00	0.00	0.00	0.00	1.95	22.11	NO	N/A	YES	NO	NO	NO
DC18	St Helier Ambulance Station, Bishopsford Road, Carshalton, SM4 6BN	Residential Ambulance Station (Sui Generis)	More vulnerable	0.30	0.00	0.00	0.00	0.00	0.00	14.40	YES	N/A	YES	NO	NO	NO
DC19	Lidl Rosehill, Wrythe Lane, Rosehill SM5 1AD	Retail (Class E) Residential	More vulnerable	0.43	0.00	0.00	0.00	0.00	0.00	6.03	YES	N/A	YES	NO	NO	NO

SFRA ID	Name	Proposed Use	Vulnerability Classification	Site Area (ha)	FZ2 (% of site area)	FZ3a (% of site area)	FZ3b (% of site area)	Main River 35% Climate Change (% of site area)	1 in 100yr RoFSW Extent (% of site area)	1 in 1000yr RoFSW Extent (% of site area)	Surface Water Flood Risk Increase due to Climate Change (not currently in 1 in 100yr RoFSW, but in 1 in 1000yr RoFSW)	Groundwater Susceptibility Banding	Sewer Flooding?	Sequential Test Required?	Exception Test Required?	Level 2 SFRA Recommended?
DC20	102-104 Rose Hill, Sutton, SM1 3HB	Residential	More vulnerable	0.98	0.00	0.00	0.00	0.00	0.00	0.00	NO	N/A	YES	NO	NO	NO
DC21	St Helier Hospital, Wrythe Lane, Sutton, Carshalton, SM5 1AA	Residential Hospital (Class C2) Health (Class E) Public Car Parking (SG)	More vulnerable	4.00	0.00	0.00	0.00	0.00	5.00	10.92	NO	< 25%	YES	NO	NO	NO
DC22	Worcester Park Telephone Exchange and Royal Mail, Longfellow Road KT4 8BB	Residential Class E Telephone Exchange and Sorting Office (SG)	More vulnerable	0.36	57.05	0.00	0.00	0.00	25.78	52.74	NO	< 25%	YES	YES	NO	YES
DC23	165-181 Central Road, Worcester Park KT4 8DR	Class E Public House (Sui Generis) Residential Open Space.	More vulnerable	0.44	97.99	0.00	0.00	0.00	5.61	55.27	NO	< 25%	YES	YES	NO	YES
DC24	Land at 1 Lynwood Drive, Worcester Park KT4 7AA	Residential (Use Class C3) Community (Class F2) Class E (Health)	More vulnerable	0.13	0.00	0.00	0.00	0.00	77.06	90.12	NO	< 25%	YES	NO	NO	NO
DC25	Stoneplace Car Park, 133B Central Road, Worcester Park KT4 8DY	Residential Class E Car Parking (Sui Generis)	More vulnerable	0.27	5.44	0.00	0.00	0.00	5.77	15.97	NO	< 25%	YES	YES	NO	YES
DC26	1-9 Windsor Road & 81-85 Central Road, Worcester Park KT4 8EB	Residential Class E	More vulnerable	0.10	0.00	0.00	0.00	0.00	0.00	0.00	NO	< 25%	YES	NO	NO	NO
DC27	Griffiths Close, 209 Cheam Common Road, Worcester Park, KT4 8SL	Retirement / Care Homes (Class C2)	More vulnerable	0.40	0.00	0.00	0.00	0.00	0.00	2.72	YES	< 25%	YES	NO	NO	NO
DC28	Land North of Braemar Road, Worcester Park, Sutton, KT4 8SW	Residential Community (Class F2)	More vulnerable	0.59	0.00	0.00	0.00	0.00	38.98	63.20	NO	< 25%	YES	NO	NO	NO
H1	Felnex Trading Estate, London Road, Hackbridge	Residential Class E Class B	More vulnerable	7.70	66.77	0.00	0.00	7.79	11.12	25.73	NO	>= 75%	YES	YES	NO	YES
H2	Land adj Hackbridge Station, London Road, Hackbridge SM6 7BJ	Residential Class E Class B	More vulnerable	1.20	0.00	0.00	0.00	0.00	7.33	14.60	NO	>= 75%	YES	NO	NO	NO
H3	Hackbridge Station, London Road, Hackbridge SM6 7BJ	Residential Class E Car Parking (Sui Generis)	More vulnerable	0.30	0.00	0.00	0.00	0.00	0.00	0.40	YES	>= 75%	YES	NO	NO	NO
H4	Vulcan House, Restmor Way, Hackbridge, SM6 7GF	Residential	More vulnerable	0.08	5.87	0.00	0.00	1.39	2.55	3.78	NO	>= 75%	YES	YES	NO	YES
H5	Land East of Sandmartin Way (BedZED), SM6 7DF	Community Open space	Less vulnerable	0.50	0.00	0.00	0.00	0.00	0.28	2.86	NO	>= 75%	YES	NO	NO	NO
H6	Hackbridge Primary School, Land north of BedZED, Hackbridge	Primary School Open Space	More vulnerable	1.59	17.53	0.00	0.00	0.00	7.58	28.08	NO	>= 75%	YES	YES	NO	YES
LCH1	London Cancer Hub, Downs Road / Brighton Road, Belmont, Sutton	Medical Research; Class E Class E(g), (i), (ii), and (iii) only; Health: Hospital; Education (Class F1); Hotel (Class C1); Ancillary Accommodation; Allotments	More vulnerable	22.60	0.00	0.00	0.00	0.00	9.19	17.01	NO	< 25%	YES	NO	NO	NO
SB1	Haredon House, 810 London Road, North Cheam SM3 9BJ	Residential	More vulnerable	0.20	2.14	0.00	0.00	0.00	0.00	1.84	YES	< 25%	YES	YES	NO	YES
SB2	Wilsons Van Centre, 730-736 London Road, Sutton SM3 9BY	Residential Class E	More vulnerable	0.28	0.00	0.00	0.00	0.00	0.00	0.00	NO	< 25%	YES	NO	NO	NO
SB3	Stonecot Car Wash, Sutton Common Road, Sutton SM3 9HA	Residential Class E	More vulnerable	0.13	0.00	0.00	0.00	0.00	0.00	0.00	NO	< 25%	YES	NO	NO	NO

SFRA ID	Name	Proposed Use	Vulnerability Classification	Site Area (ha)	FZ2 (% of site area)	FZ3a (% of site area)	FZ3b (% of site area)	Main River 35% Climate Change (% of site area)	1 in 100yr RoFSW Extent (% of site area)	1 in 1000yr RoFSW Extent (% of site area)	Surface Water Flood Risk Increase due to Climate Change (not currently in 1 in 100yr RoFSW, but in 1 in 1000yr RoFSW)	Groundwater Susceptibility Banding	Sewer Flooding?	Sequential Test Required?	Exception Test Required?	Level 2 SFRA Recommended?
SB4	Former Mortuary, Sutton Cemetery, Alcorn Close, Sutton SM3 9PX	Residential; Class E	More vulnerable	1.10	0.00	0.00	0.00	0.00	0.00	0.85	YES	< 25%	YES	NO	NO	NO
SB5	Tesco Extra (with petrol station and car park), 55 Oldfields Road, Sutton, SM1 2NB	Class E Petrol Station Employment (Class B2/B8) Residential	More vulnerable	3.70	63.31	0.00	0.00	0.00	31.71	74.47	NO	< 25%	YES	YES	NO	YES
SB6	9 St Dunstons Hill, Cheam, SM1 2JX	Residential Class E	More vulnerable	0.13	0.00	0.00	0.00	0.00	0.00	0.00	NO	< 25%	YES	NO	NO	NO
SB7	Sutton United Football Club, Gander Green Lane, Sutton SM1 2EY	Sports Ground Community Facilities (Class F2)	Less vulnerable	2.4	0.00	0.00	0.00	0.00	9.99	33.78	NO	>= 25% <50%	YES	NO	NO	NO
SB9	Tesco Express, 77 Angel Hill, Sutton, SM1 3EH	Residential; Class E	More vulnerable	0.22	0.00	0.00	0.00	0.00	0.00	5.20	YES	< 25%	YES	NO	NO	NO
SB10	All Saints Hall, Benhill Wood Road SM1 3SR	Residential; Community (Class F2)	More vulnerable	0.5	0.00	0.00	0.00	0.00	0.00	0.00	NO	< 25%	YES	NO	NO	NO
SB11	Land to the Rear of Middleton Circle, Assembly Walk, The Wrythe, SM5 1JH	Residential Place of Worship (Class F1)	More vulnerable	0.12	0.00	0.00	0.00	0.00	0.00	0.01	YES	>= 25% <50%	YES	NO	NO	NO
SB12	Waltham Road Depot, Waltham Road, the Wrythe. SM5 1PW	Residential	More vulnerable	0.12	0.00	0.00	0.00	0.00	0.00	0.22	YES	>= 25% <50%	YES	NO	NO	NO
SB13	2-4 Prince Of Wales Road, Sutton, SM1 3PA	Residential	More vulnerable	0.12	0.00	0.00	0.00	0.00	0.00	13.01	YES	< 25%	YES	NO	NO	NO
SB14	Access Self Storage Sutton, 107 Westmead Road, Sutton, SM1 4JD	Residential; Class B8	More vulnerable	0.5	0.00	0.00	0.00	0.00	6.94	44.30	NO	< 25%	YES	NO	NO	NO
SB15	Former Chelsea Timber Merchants Ltd, 71-74 Westmead Road, Sutton, SM1 4JF	Residential	More vulnerable	0.25	0.00	0.00	0.00	0.00	0.14	19.82	NO	< 25%	YES	NO	NO	NO
SB16	Allen House, Westmead Road, Carshalton SM1 4JT	Residential	More vulnerable	0.04	0.00	0.00	0.00	0.00	0.00	0.00	NO	>= 75%	YES	NO	NO	NO
SB17	Ambulance Station, Harrow Road Carshalton SM5 3QF	Community (Class F2); Residential	More vulnerable	0.09	0.00	0.00	0.00	0.00	0.00	0.00	NO	>= 75%	YES	NO	NO	NO
SB18	Carshalton Institute and Social Club, North Street, Carshalton SM5 2HW	Community (Class F2); Car Parking (Sui Generis); Residential (Class C3)	More vulnerable	0.09	0.00	0.00	0.00	0.00	0.00	0.00	NO	>= 75%	YES	NO	NO	NO
SB19	Council Offices, Denmark Road, Carshalton SM5 2JG	Residential	More vulnerable	0.4	0.00	0.00	0.00	0.00	0.00	0.14	YES	>= 75%	YES	NO	NO	NO
SB20	Council Car Park, Denmark Road, Carshalton	Residential	More vulnerable	0.4	0.00	0.00	0.00	0.00	0.00	0.02	YES	>= 75%	YES	NO	NO	NO
SB21	Land at Jessops Way, Croydon, CR0 4TS (OPTION 1)	Industrial - Class B2/B8 Class E (ii) and (iii) Residential	More vulnerable	12	0.00	0.00	0.00	0.00	0.80	5.98	NO	>= 75%	YES	NO	NO	NO
SB22	Land at Jessops Way, Croydon, CR0 4TS (OPTION 2)	Industrial - Class B2/B8 Class E (ii) and (iii)	Less vulnerable	4.13	0.00	0.00	0.00	0.00	0.30	0.63	NO	>= 75%	YES	NO	NO	NO
SB23	Land West of Beddington Lane, Sutton, CR0 4TS	Industrial - Class B2/B8 Class E (ii) and (iii)	Less vulnerable	0.11	0.00	0.00	0.00	0.00	0.88	28.59	NO	>= 75%	YES	NO	NO	NO
SB24	777 Recycling Centre, 11 Coomber Way, Croydon, CR0 4TQ	Industrial - Class B2/B8 Class E (ii) and (iii)	Less vulnerable	1	0.00	0.00	0.00	0.00	0.00	3.50	YES	>= 75%	YES	NO	NO	NO
SB25	156-160 Beddington Lane, Beddington CR0 4TE	Industrial - Class B2/B8 Class E (ii) and (iii)	Less vulnerable	1.81	0.00	0.00	0.00	0.00	2.15	30.65	NO	>= 75%	YES	NO	NO	NO
SB26	Former European Metal Recycling, Therapia Lane, Beddington	Industrial - Class B2/B8 Class E (ii) and (iii)	Less vulnerable	0.95	0.00	0.00	0.00	0.00	0.13	16.83	NO	>= 75%	YES	NO	NO	NO

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SB27	Beddington Sub-Area 3: Asda Marlowe Way, Beddington, Sutton, CR0 4XS	Industrial - Class B2/B8 Class E (ii) and (iii); Supermarket (Class E)	Less vulnerable	3.6	93.62	0.00	0.00	0.00	1.78	6.56	NO	>= 75%	YES	YES	NO	YES
SB28	Beddington Sub-Area 3: Beddington South - 112 Beddington Lane, CR9 4EP	Industrial - Class B2/B8	Less vulnerable	0.74	11.15	0.00	0.00	0.00	0.00	0.00	NO	>= 75%	YES	YES	NO	YES
SB29	Former PB Builders, 30 - 32 Beddington Lane, Beddington, Sutton, CR0 4TB	Residential	More vulnerable	0.14	47.19	0.00	0.00	28.61	0.00	26.81	YES	>= 75%	YES	YES	NO	YES
SB30	Land to rear of 81 Claydon Drive, Beddington, CR0 4QX	Residential	More vulnerable	0.25	0.00	0.00	0.00	0.00	0.00	8.08	YES	>= 75%	YES	NO	NO	NO
SB31	Sheen Way Playing Fields, Sheen Way, Beddington SM6 8NQ	School (Class F1) / Open Space Public Open Space	More vulnerable	2.5	0.00	0.00	0.00	0.00	49.95	75.75	NO	>= 75%	YES	NO	NO	NO
SB32	Land at Hannibal Way Beddington / Roundshaw CR0 4RW	Community (Class F2); Industry (Class B); Gypsy and Traveller Site	Highly vulnerable	0.31	0.00	0.00	0.00	0.00	7.99	25.59	NO	>= 75%	YES	NO	NO	NO
SB33	Land to East of 41-52 Alexandra Gardens, Carshalton SM5 4LJ	Residential	More vulnerable	0.24	0.00	0.00	0.00	0.00	0.00	9.45	YES	>= 75%	YES	NO	NO	NO
SB34	1-3 Metcalfe Avenue, Carshalton SM5 4AN	Residential; Class E; Employment (Class B); Health	More vulnerable	1	0.00	0.00	0.00	0.00	0.00	5.65	YES	< 25%	YES	NO	NO	NO
SB35	Former Carshalton Beeches Bowling Club and Land, 61 Banstead Road Sth, SM2 5LH	Residential	More vulnerable	0.54	0.00	0.00	0.00	0.00	0.00	0.00	NO	N/A	YES	NO	NO	NO
SB36	Land East of Woodmansterne Lane, Wallington, SM6 0SU	Residential	More vulnerable	3.4	0.00	0.00	0.00	0.00	0.36	3.22	NO	>= 25% <50%	YES	NO	NO	NO
SB37	Woodcote Grove House, Orford House, Field Cottages 1-3 and Cottages 1-2, Woodcote Grove CR5 2XL	Retirement / Care Homes (Class C2); Residential (Class C3)	More vulnerable	16	0.00	0.00	0.00	0.00	0.00	0.00	NO	N/A	YES	NO	NO	NO
SB38	Land to the East of Grove Place, Carshalton	Gypsy and Traveller Site	Highly vulnerable	0.26	0.00	0.00	0.00	0.00	0.00	0.00	NO	N/A	YES	NO	NO	NO
SB39	The Mount, Clockhouse Estate, Clockhouse, Coulsdon (1)	Residential; Community (Class F)	More vulnerable	0.17	0.00	0.00	0.00	0.00	0.00	0.00	NO	N/A	YES	NO	NO	NO
SB40	Longlands Avenue / Hillcrest Parade, Clockhouse Estate, Coulsdon (2) CR5 2PS	Residential; Community (Class F); Class E	More vulnerable	0.37	0.00	0.00	0.00	0.00	0.00	0.00	NO	N/A	YES	NO	NO	NO
SB41	Downlands Close, Clockhouse Estate, Clockhouse, Coulsdon (4) CR5 2QH	Residential	More vulnerable	0.4	0.00	0.00	0.00	0.00	0.00	0.00	NO	N/A	YES	NO	NO	NO
SB42	Longlands Avenue / Pembury Close, Clockhouse Estate, Clockhouse, Coulsdon (5); CR5 2QX	Residential	More vulnerable	0.51	0.00	0.00	0.00	0.00	0.00	2.62	YES	N/A	YES	NO	NO	NO
SB43	Trickett House, 125 Brighton Road, Sutton, SM2 5SN	Residential	More vulnerable	0.46	0.00	0.00	0.00	0.00	4.74	15.99	NO	< 25%	YES	NO	NO	NO
SB44	Sutton Ambulance Station, 18 Dorset Rd, Sutton, SM2 6HX	Residential; Ambulance Station (SG)	More vulnerable	0.12	0.00	0.00	0.00	0.00	0.00	0.00	NO	< 25%	YES	NO	NO	NO
SB45	Grantley Court Nursing Home, 22 York Road, Cheam SM2 6HH	Residential	More vulnerable	0.2	0.00	0.00	0.00	0.00	0.00	0.20	YES	< 25%	YES	NO	NO	NO
SB46	Health Education Books, Willow House, Willow Walk, Sutton, SM3 9QQ	Class B Class E	Less vulnerable	0.1	100.00	0.00	0.00	0.00	28.53	100.00	NO	< 25%	YES	YES	NO	YES
SB48	Land to sth of the Pastures, Carshalton Road, Woodcote	Gypsy and Traveller Site	Highly vulnerable	0.58	0.00	0.00	0.00	0.00	0.00	0.00	NO	N/A	YES	NO	NO	NO
SB49	Sainsbury's/Argos Distribution Centre, Marlowe Way, Beddington. CR0 4XS	Employment (Class B2/B8/E)	Less vulnerable	1.98	93.28	0.00	0.00	0.00	0.00	17.06	YES	>= 75%	YES	YES	NO	YES

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SB50	Land to the south of Marlowe Way, Beddington, CR0 4XS	Employment (Class B2/B8/E)	Less vulnerable	1.1	83.72	0.00	0.00	0.00	1.01	46.33	NO	>= 75%	YES	YES	NO	YES
SB51	Garages at Radcliffe Gardens, Carshalton Beeches	Residential	More vulnerable	0.11	0.00	0.00	0.00	0.00	3.46	11.73	NO	>= 50% <75%	YES	NO	NO	NO
SB53				3.07	35.74	0.00	0.00	0.00	18.81	50.70	NO	>= 75%	YES	YES	NO	YES
SB54				1.28	15.31	0.00	0.00	0.00	31.50	59.77	NO	< 25%	YES	YES	NO	YES
STC1	Helena House, 348-352 High Street, Sutton SM1 1QE	Residential; Class E	More vulnerable	0.14	0.00	0.00	0.00	0.00	0.00	14.64	YES	< 25%	YES	NO	NO	NO
STC2	Former Morrison's Local and Car Park, SM1 1LW	Residential; Class E	More vulnerable	0.15	0.00	0.00	0.00	0.00	0.87	93.54	NO	>= 25% <50%	YES	NO	NO	NO
STC3	Lidl Block, High Street, Sutton SM1 1PG	Residential; Class E	More vulnerable	0.56	0.00	0.00	0.00	0.00	12.60	86.79	NO	>= 25% <50%	YES	NO	NO	NO
STC4	Halford Block, Throwley Way, Sutton SM1 1SE	Residential; Class E	More vulnerable	0.27	0.00	0.00	0.00	0.00	0.00	5.17	YES	>= 25% <50%	YES	NO	NO	NO
STC5	Northern Gateway, 246-254 High Street and 2 Marshalls Road, Sutton, SM1 1PA	Class E Education (Class F) Residential	More vulnerable	0.31	0.00	0.00	0.00	0.00	0.05	0.18	NO	>= 25% <50%	YES	NO	NO	NO
STC6	Elm Grove Estate, Sutton, SM1 4EU	Residential	More vulnerable	2.04	0.00	0.00	0.00	0.00	0.00	1.74	YES	>= 25% <50%	YES	NO	NO	NO
STC7	2-4 Greenford Road, Sutton SM1 1JY	Residential; Class E	More vulnerable	0.04	0.00	0.00	0.00	0.00	0.00	0.00	NO	>= 25% <50%	YES	NO	NO	NO
STC8	Rosebery Gardens, Sutton, SM1 4EZ	Residential	More vulnerable	0.5	0.00	0.00	0.00	0.00	9.21	65.48	NO	>= 25% <50%	YES	NO	NO	NO
STC9	Salvation Army Church, 45 Benhill Avenue, Sutton, SM1 4DD	Residential; Class E; Class F1	More vulnerable	0.12	0.00	0.00	0.00	0.00	8.84	28.42	NO	>= 25% <50%	YES	NO	NO	NO
STC10	Benhill Estate, Sutton, SM1 4DG	Residential Health (Class E)	More vulnerable	0.39	0.00	0.00	0.00	0.00	6.54	29.30	NO	>= 25% <50%	YES	NO	NO	NO
STC11	Herald House, 17 Throwley Way, Sutton SM1 4DA	Residential; Class E	More vulnerable	0.05	0.00	0.00	0.00	0.00	0.00	0.00	NO	>= 25% <50%	YES	NO	NO	NO
STC12	Old Court House Surgery, Court House, Throwley Way, Sutton, SM1 4AF	Residential; Class E; Health	More vulnerable	0.15	0.00	0.00	0.00	0.00	9.07	19.04	NO	>= 25% <50%	YES	NO	NO	NO
STC13	2-4 Lodge Place, Sutton, SM1 4AU	Residential; Class E	More vulnerable	0.4	0.00	0.00	0.00	0.00	0.00	0.04	NO	>= 25% <50%	YES	NO	NO	NO
STC14	Kwitfit Site, Throwley Way, Sutton SM1 4AF	Residential	More vulnerable	0.09	0.00	0.00	0.00	0.00	0.00	0.00	NO	>= 25% <50%	YES	NO	NO	NO
STC15	Times Square Car Park, Throwley Way SM1 4AU	Residential ; Car Park (Sui Generis)	More vulnerable	0.74	0.00	0.00	0.00	0.00	0.00	0.00	NO	>= 25% <50%	YES	NO	NO	NO
STC16	Times House, Throwley Way SM1 4AF	Residential; Class E	More vulnerable	0.2	0.00	0.00	0.00	0.00	0.00	0.00	NO	>= 25% <50%	YES	NO	NO	NO
STC17	Land ro Times Square, Throwley Way, Sutton, SM1 1LF	Residential; Indoor Play Space (D1); Class E	More vulnerable	0.4	0.00	0.00	0.00	0.00	0.00	0.00	NO	>= 25% <50%	YES	NO	NO	NO
STC18	Houses adjacent to Manor Park, Throwley Way SM1 4AE/4AF	Residential; Class E	More vulnerable	0.52	0.00	0.00	0.00	0.00	0.00	0.00	NO	>= 25% <50%	YES	NO	NO	NO
STC19	Former Wilko Site, High Street, Sutton SM1 1EZ	Residential; Class E	More vulnerable	0.11	0.00	0.00	0.00	0.00	0.00	0.08	YES	>= 25% <50%	YES	NO	NO	NO
STC20	Throwley Yard, Surrey House, Throwley Road, Sutton, SM1 1AD	Class E; Other (Sui Generis)	Less Vulnerable	0.13	0.00	0.00	0.00	0.00	0.00	0.00	NO	>= 25% <50%	YES	NO	NO	NO
STC21	Sutton Park House, 15 Carshalton Road, Sutton SM1 4LD	Residential; Class E	More vulnerable	0.26	0.00	0.00	0.00	0.00	0.00	0.00	NO	>= 25% <50%	YES	NO	NO	NO
STC22	3-9 Carshalton Road, Sutton, SM1 4LE	Residential; Class E	More vulnerable	0.03	0.00	0.00	0.00	0.00	0.00	0.00	NO	>= 25% <50%	YES	NO	NO	NO
STC23	B&Q Site, Sutton Court Road, Sutton, SM1 4RQ	Residential; Class E; Health	More vulnerable	2.26	0.00	0.00	0.00	0.00	2.98	38.31	NO	< 25%	YES	NO	NO	NO
STC24	Sutton Station and Car Park, Brighton Road, Sutton SM2 5BW	Residential; Class E; Public Car Parking	More vulnerable	1.24	0.00	0.00	0.00	0.00	37.53	43.36	NO	< 25%	YES	NO	NO	NO

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STC25	Quadrant House, Brighton Road, Sutton, SM2 5AS	Residential; Class E	More vulnerable	0.61	0.00	0.42	0.00	0.00	29.85	80.22	NO	< 25%	YES	NO	YES	NO
STC26	Petrol Station North of SubSea7, Brighton Road, Sutton SM2 5BN	Residential; Class E	More vulnerable	0.32	0.00	59.83	0.00	0.00	9.58	51.84	NO	< 25%	YES	YES	NO	YES
STC27	2-4 Copse Hill and 52-54 Brighton Road, Sutton, SM2 6AD	Residential; Class E	More vulnerable	0.24	0.00	0.00	0.00	0.00	1.47	2.92	NO	< 25%	YES	NO	NO	NO
STC28	Shops Opposite Sutton Station, High Street, Sutton SM2 6LE	Residential; Class E	More vulnerable	0.18	0.00	0.00	0.00	0.00	2.07	2.70	NO	< 25%	YES	NO	NO	NO
STC29	1-3 High Street, Sutton, SM1 1DF	Residential; Class E	More vulnerable	0.07	0.00	0.00	0.00	0.00	0.00	0.00	NO	< 25%	YES	NO	YES	NO
STC30	Copthall House, Grove Road, Sutton, SM1 1DA	Residential; Class E	More vulnerable	0.07	0.00	73.48	0.00	0.00	2.25	3.36	NO	< 25%	YES	YES	NO	YES
STC31	Land North of Grove Road (44 - 74 Grove Road), Sutton, SM1 1BT	Residential; Class E	More vulnerable	0.18	0.00	0.00	0.00	0.00	0.00	0.00	NO	< 25%	YES	NO	YES	NO
STC32	Land North of Grove Road, Sutton SM1 1DD	Residential; Class E	More vulnerable	1.05	0.00	49.12	0.00	0.00	0.00	0.01	YES	>= 25% <50%	YES	YES	YES	YES
STC33	36 - 50 Grove Road, Sutton, SM1 1BS	Residential; Class E	More vulnerable	0.09	0.00	57.67	0.00	0.00	0.00	0.00	NO	< 25%	YES	YES	NO	YES
STC34	City House, Sutton Park Road, Sutton, SM1 2AE	Residential; Class E	More vulnerable	0.18	0.00	0.00	0.00	0.00	0.00	0.00	NO	>= 25% <50%	YES	NO	NO	NO
STC35	10-12 Cheam Road, Sutton, SM1 1SR	Residential; Class E	More vulnerable	1.24	0.00	0.00	0.00	0.00	0.00	0.00	NO	>= 25% <50%	YES	NO	YES	NO
STC36	Civic Offices, St Nicholas Way, Sutton, SM1 1EA	Residential; Class E; Health	More vulnerable	0.9	0.00	0.71	0.00	0.00	6.34	14.23	NO	>= 25% <50%	YES	YES	YES	YES
STC37	Former Secombe Theatre, 42 Cheam Rd, Sutton, SM1 2SS	Residential; Class E; Health	More vulnerable	0.4	0.00	47.72	0.00	0.00	0.00	0.00	NO	>= 25% <50%	YES	YES	YES	YES
STC38	Gibson Road Multi-Storey Car Park, Sutton, SM1 2RF	Residential	More vulnerable	0.67	0.00	91.69	0.00	0.00	1.56	8.77	NO	>= 25% <50%	YES	YES	NO	YES
STC39	St Nicholas House, St Nicholas Way, Sutton, SM1 1EH	Residential; Class E	More vulnerable	0.08	0.00	0.00	0.00	0.00	0.00	0.00	NO	>= 25% <50%	YES	NO	YES	NO
STC40	Robin Hood Lane Health Centre, Robin Hood Lane, Sutton, SM1 2RJ	Health	More vulnerable	0.25	0.00	55.68	0.00	0.00	0.00	0.00	NO	>= 25% <50%	YES	YES	NO	YES
STC41	8-25 Beech Tree Place and 29-35 West Street, Sutton SM1 1SF/1SJ	Residential	More vulnerable	0.42	0.00	0.00	0.00	0.00	0.00	0.00	NO	>= 25% <50%	YES	NO	NO	NO
STC42	St.Nicholas Centre, St Nicholas Way, Sutton, SM1 1AW	Retail; Offices; Library; Cafe & Restaurants; Leisure; Health; Residential; Class E; Class F1; Class F2	More vulnerable	2.1	0.00	0.00	0.00	0.00	0.36	6.89	NO	>= 25% <50%	YES	NO	NO	NO
STC43	St.Nicholas Centre Car Park, St Nicholas Way, Sutton, SM1 1AW	Car Park; Cinema; Residential; Class E	More vulnerable	0.5	0.00	0.00	0.00	0.00	15.19	57.69	NO	>= 25% <50%	YES	NO	NO	NO
STC44	Sutton West Centre, Robin Hood Lane SM1 2SD	Residential; Education (Class F1)	More vulnerable	1.1	0.00	0.00	0.00	0.00	15.12	41.03	NO	>= 25% <50%	YES	NO	NO	NO
STC45	31-35 St Nicholas Way, Sutton SM1 1JN	Residential; Class E	More vulnerable	0.09	0.00	0.00	0.00	0.00	0.00	0.00	NO	>= 25% <50%	YES	NO	NO	NO
STC46	219 - 227 High Street, Sutton, SM1 1LB (Former Argos)	Residential; Class E	More vulnerable	0.09	0.00	0.00	0.00	0.00	5.04	7.87	NO	>= 25% <50%	YES	NO	YES	NO
STC47	Bus Garage, Bushey Road, Sutton SM1 1QJ	Residential; Bus Garage (Sui Generis)	More vulnerable	0.55	0.00	10.52	0.00	0.00	0.32	20.45	NO	>= 25% <50%	YES	YES	YES	YES
STC48	Chaucer Estate, Milton Road, Sutton SM1 2RA	Residential; Class E	More vulnerable	3.06	1.05	2.63	0.00	0.00	8.76	19.96	NO	>= 25% <50%	YES	YES	YES	YES

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STC49	Collingwood Estate, Sutton, Collingwood Road, Sutton SM1 1RX	Residential; Class E; Health	More vulnerable	2.83	0.00	16.59	0.00	0.00	12.25	34.00	NO	>= 25% <50%	YES	YES	YES	YES
STC50	Sutton Court Estate, Brighton Road, Sutton SM2 5BP	Residential; Class E	More vulnerable	2.03	0.00	0.61	0.00	0.00	7.15	31.17	NO	< 25%	YES	YES	NO	YES
STC51	Eothen 31 Worcester Road, Sutton SM2 6PT	Residential	More vulnerable	0.22	0.00	0.00	0.00	0.00	0.00	2.92	YES	< 25%	YES	NO	NO	NO
STC52	Norman House, 70 Cheam Road, Sutton, SM1 2SU	Retirement / Care Homes (Class C2)	More vulnerable	0.17	0.00	0.00	0.00	0.00	0.01	15.60	NO	< 25%	YES	NO	NO	NO
W1	BTS House, 69 - 73 Manor Road, Wallington, SM6 0DD	Residential; Class E	More vulnerable	0.15	0.00	0.00	0.00	0.00	0.00	0.00	NO	>= 75%	YES	NO	NO	NO
W2	Melbourne Road Car Park, Wallington SM6 8SF	Residential; Class E; Public Car Parking (Sui Generis)	More vulnerable	0.23	0.00	0.00	0.00	0.00	0.00	0.00	NO	>= 75%	YES	NO	NO	NO
W3	Wallington Telephone Exchange, Melbourne Road, Wallington SM6 8SD	Residential; Telephone Exchange (SG)	More vulnerable	0.17	0.00	0.00	0.00	0.00	0.00	0.06	YES	>= 75%	YES	NO	NO	NO
W4	Shell Garage, 102 Manor Road, Wallington, SM6 0DW	Residential; Class E; Petro Station (SG)	More vulnerable	0.25	0.00	0.00	0.00	0.00	0.00	14.47	YES	>= 75%	YES	NO	NO	NO
W5	Wallington Delivery Office, Grosvenor Road, Wallington SM6 0EN	Residential; Class E; Postal Sorting Office (SG)	More vulnerable	0.34	0.00	0.00	0.00	0.00	0.00	0.00	NO	>= 75%	YES	NO	NO	NO
W6	Railway Approach, Wallington SM6 0DZ	Car Park (Sui Generis); Offices (Class E); Retail (Class E); Residential	More vulnerable	1.1	0.00	0.00	0.00	0.00	1.16	11.34	NO	>= 75%	YES	NO	NO	NO
W7	Lidl Site, Beddington Gardens, Wallington SM6 0HU	Retail (Class E); Residential	More vulnerable	0.3	0.00	0.00	0.00	0.00	0.00	0.00	NO	>= 75%	YES	NO	NO	NO
W8	Manor Road / Ross Parade (The Whispering Moon Pub) SM6 8QF	Pub (Sui Generis); Retail (Class E); Residential	More vulnerable	0.15	0.00	0.00	0.00	0.00	0.10	0.49	NO	>= 75%	YES	NO	NO	NO
W9	Travis Perkins, 21 Ross Parade Wallington SM6 8QF	Residential; Class E	More vulnerable	0.15	0.00	0.00	0.00	0.00	0.00	0.00	NO	>= 75%	YES	NO	NO	NO
W10	Sainsbury's, 2 Stafford Rd, Wallington, SM6 9AA	Residential; Class E	More vulnerable	0.8	0.00	0.00	0.00	0.00	1.88	4.97	NO	>= 75%	YES	NO	NO	NO
W11	Shotfield Car Park, Shotfield Road, Wallington SM6 0EU	Residential Public Car Parking (SG)	More vulnerable	0.4	0.00	0.00	0.00	0.00	1.65	5.08	NO	>= 75%	YES	NO	NO	NO
W12	Former Wallington Hall Car Park, Wallington, SM6 0PR	Residential	More vulnerable	0.26	0.00	0.00	0.00	0.00	0.01	2.66	NO	>= 75%	YES	NO	NO	NO
W13	Crosspoint House, 28 Stafford Road, Wallington, SM6 9AA	Residential; Class E	More vulnerable	0.28	0.00	0.00	0.00	0.00	0.00	0.00	NO	>= 75%	YES	NO	NO	NO
W14	Land Rear of 105 Stafford Road, Wallington SM6 9AP	Residential; Class E; Warehouse (B8)	More vulnerable	0.13	0.00	0.00	0.00	0.00	0.00	0.00	NO	>= 75%	YES	NO	NO	NO
W15	Land at St Elpheges Church, Stafford Road, Wallington SM6 9AY	Residential; Class E	More vulnerable	0.18	0.00	0.00	0.00	0.00	0.00	0.06	YES	>= 75%	YES	NO	NO	NO
W16	Cloverdale Court, 10 Stanley Park Road, Wallington, SM6 0EU	Residential	More vulnerable	0.35	0.00	0.00	0.00	0.00	0.00	0.00	NO	>= 75%	YES	NO	NO	NO
W17	Land Rear of 16-18 Stanley Park Road / Holmwood Gardens SM6 0EU	Residential	More vulnerable	0.09	0.00	0.00	0.00	0.00	0.00	0.00	NO	>= 75%	YES	NO	NO	NO
W18	Crusader Hall, Stanley Park Road, Wallington SM6 0ET	Residential; Community (Class F2)	More vulnerable	0.1	0.00	0.00	0.00	0.00	0.02	37.57	NO	>= 75%	YES	NO	NO	NO
W19	Gower House, 75 Woodcote Road, Wallington SM6 0PU	Residential	More vulnerable	0.13	0.00	0.00	0.00	0.00	0.00	0.00	NO	>= 75%	YES	NO	NO	NO
SB47	Linney Fencing Ltd, Nursery Gardens, Goat Road, CR4 4HU	Employment (Class B2/B8/E)	Less vulnerable	0.46	35.47	0.00	0.76	18.28	0.15	43.78	NO	>= 50% <75%	YES	YES	NO	YES

SFRA ID	Name	Proposed Use	Vulnerability Classification	Site Area (ha)	FZ2 (% of site area)	FZ3a (% of site area)	FZ3b (% of site area)	Main River 35% Climate Change (% of site area)	1 in 100yr RoFSW Extent (% of site area)	1 in 1000yr RoFSW Extent (% of site area)	Surface Water Flood Risk Increase due to Climate Change (not currently in 1 in 100yr RoFSW, but in 1 in 1000yr RoFSW)	Groundwater Susceptibility Banding	Sewer Flooding?	Sequential Test Required?	Exception Test Required?	Level 2 SFRA Recommended?
SB8(a)	Rosehill Recreation Ground, Rose Hill, Sutton, SM1 3HH OPTION A	Education (Class F1)	More vulnerable	5.82	27.06	0.00	11.36	22.82	17.00	39.15	NO	< 25%	YES	YES	NO	YES
SB8(b)	Rosehill Recreation Ground, Rose Hill, Sutton, SM1 3HH OPTION B	Education (Class F1)	More vulnerable	2.51	28.34	0.00	14.11	24.44	19.05	40.47	NO	< 25%	YES	YES	NO	YES
SB52	Wandle Valley Trading Estate	Employment (Class B2/B8/E)	Less vulnerable	0.54	99.06	0.00	25.61	80.35	31.75	63.52	NO	>= 25% <50%	YES	YES	NO	YES

Key Assumptions

1. Sites with 0% of areas in FZ2 and FZ3a/b do not require the Sequential Test (on the basis that other forms of flood risk are generally manageable on a site by site basis)
2. Sites within FZ2 or 3a/b require the Sequential Test
3. Highly Vulnerable sites within FZ2 require the Exception Test
4. Essential Infrastructure sites within FZ3a or FZ3b require the Exception Test
5. More Vulnerable sites within FZ3a require the Exception Test
6. Level 2 SFRA recommended where the Sequential Test is need and the site is within FZ2, FZ3a, FZ3b, Main River +CC, or 20% of the site is within the RoFSW 1 in 100 year extent

12. NEXT STEPS

SA REPORT ON LOCAL PLAN ISSUES & PREFERRED OPTIONS - CONCLUSIONS

12.1 This SA Report on Local Plan Issues and Options (this document) has been prepared together with the Habitats Regulations Assessment screening report (see Appendix) and the Equalities Impact Assessment (*EqIA) is to inform public consultation on the Local Plan Issues & Preferred Options (Regulation 18 consultation) document by assessing the likely impacts of alternative strategic options and the Council's preferred policies on the environmental, social and economic objectives making up the Council's amended SA Framework and on identified equalities target groups.

12.2 It demonstrates that the Council's emerging Local Plan Vision, Strategic Objectives and Preferred Policy Options for the future development and growth of the Borough is consistent with delivering the sustainability objectives making up the Council's SA Framework and all relevant of national, sub-regional (London) and local policies and guidelines. In particular, it is consistent with delivering the Mayor's objective of 'good growth' and the Council's commitment to net zero set out in Sutton's Climate Emergency Response Plan.

12.3 This SA Report also sets out the outcome of the the sequential test (flood risk) in accordance with Government PPG.

CONSULTATION ARRANGEMENTS

12.4 Following approval at HEB Committee on 17 July 2024, this SA 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 13 June to Friday 26 July 2024. In line with Sutton's adopted Statement of Community Involvement (SCI)¹⁴, this SA 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.

12.5 A series of consultation workshops has been arranged for the following Local Committees during June and July 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 (where the SA will form the focus of the discussions).

12.6 Copies have also sent to the three statutory consultation bodies (Historic England, Natural England and Environment Agency) and to a range of appropriate authorities and local stakeholders with environmental interests or responsibilities, including those who responded previously to the Scoping Report.

¹⁴ Sutton's adopted Statement of Community Involvement (SCI) (Dec 2019) is available at https://drive.google.com/file/d/1bODFqsgdm_C6dN6SopgDFbliiAXSzmtD/view

APPENDIX 1

Sutton Local Plan Review

CONSULTEE COMMENTS ON SA SCOPING REPORT

7 May to 11 June 2024

Strategic Planning

Environment and Planning Division

London Borough of Sutton

(1) Environment Agency comments on SA Scoping Report - 5 June 2024

creating a better place
for people and wildlife



Patrick Whitter
London Borough of Sutton
Sent by email.

Our ref: SU/2022/122262/SE-
01/SP1-L01

Date: 5 June 2024

Consultation on Sustainability Appraisal (SA) Strategic Environmental Assessment (SEA) Scoping Report – Planning and Compulsory Purchase Act 2004

Dear Patrick,

Thank you for consulting us on your Sustainability Appraisal (SA) Strategic Environmental Assessment (SEA) Scoping Report on 7 May 2024. We have welcomed the opportunity provided to provide comments on earlier drafts of this document, in addition to this formal consultation.

At this stage, our aim is to ensure that, relating to matters within our remit:

- Appropriate environmental information and detail is provided
- Plans or programmes (including our own) that may have influence on the scope of the plan have been considered
- Key sustainability issues have been identified

3. Other relevant plans, programmes and sustainability objectives (Task A1)

Studies forming as part of the local plan evidence base

We note that this section states that your Strategic Flood Risk Assessment (SFRA) Level 1 and Level 2 Reports are ongoing. These will form a key part of the evidence base for the plan. We have not yet been consulted formally on your level 1 SFRA however having viewed drafts we are satisfied that the material we have reviewed to date broadly complies with the guidance set out in the Planning Practice Guidance [Flood risk and coastal change - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/flood-risk-and-coastal-change) and our Strategic Flood Risk Assessment Guidance [How to prepare a strategic flood risk assessment - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/how-to-prepare-a-strategic-flood-risk-assessment).

We look forward to reviewing a final version of your Level 1 SFRA and Level 2 SFRA in due course.

4. The environmental, economic, and social baseline (Task A2)

Flood Risk

We are satisfied that the most up to-date flood risk data has been used in the "flood risk section".

In terms of the flood alleviation schemes listed, we would recommend that this is updated to reflect the following:

customer service line 03708 506 506
[gov.uk/environment-agency](https://www.gov.uk/environment-agency)

Worcester Park Flood Alleviation Scheme (CDA 22)

Funding approved from Environment Agency and Thames Water. The proposed design consists of a wetland and dry basins that will attenuate storm water before releasing it back into the Thames Water surface water sewer network at a controlled rate.

Work completed: The EA National Project Assurance Service (NPAS) (the EA's external reviewer) recommended approval of the Outline Business Case (OBC) and a Grant in Aid application has been approved; detailed design and stakeholder engagement phase; planning and sewer diversion applications.

Next steps: Awaiting all permissions, and construction.
Construction expected in 2025

Beddington Gardens/ Wallington Station (CDAs 29 and 30) and South Beddington - including Demesne Road (CDA 31)

This project covers a large catchment area. A feasibility report has been completed however the economic analysis found that none of the options would be proportional. We understand that the council is now investigating alternative approaches.

Rosehill Park Flood Alleviation Scheme

This project was unable to secure sufficient funding so we would recommend that this section is removed or a note is added to clarify it is not currently going ahead.

5. Key issues and problems (Task A1)

Flood Risk and Water Resources

We are pleased to note the issues identified in this section take an integrated approach to flood risk management.

5.33 It should be noted that change of use applications may also involve an increase in flood risk vulnerability, either from change in classification (as defined in [Annex 3](#) of the NPPF) or an increase of occupancy. Since change of use are not normally subject to the Sequential or Exception Tests, we would encourage you to consider what will be acceptable, taking into account the findings of your SFRA. Change of use applications can be an opportunity to improve the flood resilience of existing development by mitigating and adapting to the impacts of flooding

Water Resources

5.64 We support the use of water efficiency measures to reduce demand on water resources and to accommodate growth in business, housing and population requirements without the need to increase overall consumption.

Where there is clear local need, we support setting more higher standards than the mandatory national standard set out in the Building Regulations of 125 litres/person/day (l/p/d).

You should refer to the following report, which identifies Sutton as being in an area of serious water stress

<https://www.gov.uk/government/publications/water-stressed-areas-2021-classification>

The emerging local plan should consider the capacity and quality of water supply systems and any impact development may have on the environment, including understanding the supply and demand patterns now and in the future across the borough area. Projected water availability should take account of the impact of a changing climate. Water companies hold information and data to help with this and the council should work closely with water companies when they are producing the local plans.

Wandle Valley

What potential environmental improvements and opportunities should be prioritised within the Wandle Valley growth corridor over the next 10-15 years? Priorities include

- *work with developers, the Environment Agency, Thames Water, the South East Rivers Trust and other stakeholders to improve water quality of the river, in particular lowering levels of phosphates and limiting sewage and road run-off,*

The above priorities should perhaps include restoration opportunities such as re-meandering, bank softening and regrading and installation of woody materials which can present improvements for biodiversity, flow diversity, water quality and flood risk. As South East Rivers Trust have been mentioned, this may already be the intention but restoration has not been explicitly referenced.

Green infrastructure (GI)/ Urban greening

5.7.6 Through future local plan policies, the improvements outlined for the river Wandle (for biodiversity, flood risk management, access, river quality and amenity) should be sought via enhancement of the river by restoration, for developments with main rivers within or on the red line boundary.

Green corridors and linked habitats

5.99 It is very positive to see that in potential development sites currently with no BNG value, assigning a potential area based provision of net gain to biodiversity where a percentage based on the original condition would be ineffective. This is already an issue that has come to light in various areas and consideration of this potential solution is welcomed.

Biodiversity Net Gain

5.96 We are pleased to note that the key issues noted for this topic identify that the Borough's approach to Local Nature Recovery Strategies (LNRS) should be aligned to BNG delivery. It should, however, be noted here that the LNRS covering Sutton will be produced on a London-wide scale <https://www.london.gov.uk/programmes->

Should you have any queries regarding this response, please contact me.

Yours sincerely,

George Goodby
Sustainable Places Planning Specialist

E-mail ksiplanning@environment-agency.gov.uk

Ref	Environment Agency Comment	Council Response
3	Studies forming as part of the local plan evidence base	
3.1	We note that this section states that your Strategic Flood Risk Assessment (SFRA) Level 1 and Level 2 Reports are ongoing. These will form a key part of the evidence base for the plan. We have not yet been consulted formally on your level 1 SFRA however having viewed drafts we are satisfied that the material we have reviewed to date broadly complies with the guidance set out in the Planning Practice Guidance Flood risk and coastal change - GOV.UK (www.gov.uk) and our Strategic Flood Risk Assessment Guidance How to prepare a strategic flood risk assessment - GOV.UK (www.gov.uk). We look forwarding to reviewing a final version of your Level 1 SFRA and Level 2 SFRA in due course.	Noted
4	The environmental, economic, and social baseline (Task A2)	
4..1	Flood Risk We are satisfied that the most up to-date flood risk data has been used in the "flood risk section".:	Noted
4.2	Update flood alleviation scheme information to reflect the following: Worcester Park Flood Alleviation Scheme (CDA 22) <ul style="list-style-type: none"> Funding approved from Environment Agency and Thames Water. The proposed design consists of a wetland and dry basins that will attenuate storm water before releasing it back into the Thames Water surface water sewer network at a controlled rate. Work completed: The EA National Project Assurance Service (NPAS) (the EA's external reviewer) recommended approval of the Outline Business Case (OBC) and a Grant in Aid application has been approved; detailed design and stakeholder engagement phase; planning and sewer diversion applications. Next steps: Awaiting all permissions, and construction. Construction expected in 2025 	Agreed: Table of Flood Alleviation schemes in Section 4: Baseline on p111 of SA Report updated accordingly
4.3	In terms of the flood alleviation schemes listed, we would recommend that this is updated to reflect the following: Beddington Gardens/ Wallington Station (CDAs 29 and 30) and South Beddington - including Demesne Road (CDA 31) <ul style="list-style-type: none"> This project covers a large catchment area. A feasibility report has been completed however the economic analysis found that none of the options would be proportional. We understand that the council is now investigating alternative approaches. 	Agreed: Table of Flood Alleviation schemes in Section 4: Baseline on p111 of SA Report updated accordingly
4.4	In terms of the flood alleviation schemes listed, we would recommend that this is updated to reflect the following: Rosehill Park Flood Alleviation Scheme <ul style="list-style-type: none"> This project was unable to secure sufficient funding so we would recommend that this section is removed or a note is added to clarify it is not currently going ahead. 	Agreed: Section relating to the Rosehill Park Flood Alleviation Scheme deleted accordingly
5.	Key issues and problems (Task A1)	
5.1	Flood Risk and Water Resources We are pleased to note the issues identified in this section take an integrated approach to flood risk management	Noted
5.33	It should be noted that change of use applications may also involve an increase in flood risk vulnerability, either from change in classification (as defined in Annex 3 of the NPPF) or an increase of occupancy. Since change of use are not normally subject to the Sequential or Exception Tests, we would encourage you to consider what will be acceptable, taking into account the findings of your SFRA. Change of use applications can be an opportunity to improve the flood resilience of existing development by mitigating and adapting to the impacts of flooding	Agreed: The following inserted as Para 5.34 of Section 5 of the SA Report on 'Key Issues' <u>"Should the Local Plan include specific policy requirements for change of use applications located within flood risk areas which either involve an increase in flood risk vulnerability and/ or an increase of occupancy, given that such applications are not normally subject to the Sequential or Exception Tests? In such cases, how can Local Plan policies maximise opportunities to improve flood resilience of the existing development or help to to mitigate and adapt to the impacts of flooding"</u>

Ref	Environment Agency Comment	Council Response
5.64	Water Resources Where there is clear local need, we support setting more higher standards that the mandatory national standard set out in the Building Regulations of 125 litres/person/day (l/p/d).	Noted
	Water stressed areas You should refer to the following report, which identifies Sutton as being in an area of serious water stress https://www.gov.uk/government/publications/water-stressed-areas-2021-classification The emerging local plan should consider the capacity and quality of water supply systems and any impact development may have on the environment, including understanding the supply and demand patterns now and in the future across the borough area. Projected water availability should take account of the impact of a changing climate. Water companies hold information and data to help with this and the council should work closely with water companies when they are producing the local plans.	Agreed: A note has been inserted under the heading of 'Water Resources and Household Water Consumption' as part of Section 4 'Baseline' which refers to LB Sutton being located within an area of water stress. Two new issues have been added to Section 5 'Key Issues' as follows: "The need for the LP to consider the capacity and quality of water supply systems and any impact development may have on the environment, including understanding the supply and demand patterns now and in the future across the borough". "The need for projected water availability to take account of the impact of a changing climate and to work closely with the relevant water supply company in preparing the Local Plan"
	Wandle Valley What potential environmental improvements and opportunities should be prioritised within the Wandle Valley growth corridor over the next 10-15 years? Priorities include "work with developers, the Environment Agency, Thames Water, the South East Rivers Trust and other stakeholders to improve water quality of the river, in particular lowering levels of phosphates and limiting sewage and road run- off". The above priorities should perhaps include restoration opportunities such as re- meandering, bank softening and regrading and installation of woody materials which can present improvements for biodiversity, flow diversity, water quality and flood risk. As South East Rivers Trust have been mentioned, this may already be the intention but restoration has not been explicitly referenced.	Agreed: Additional bullet point inserted under 'Wandle Valley' heading in Section 5 of the SA Report on 'Key Issues' as follows: "what potential environmental improvements and opportunities should be prioritised within the Wandle Valley growth corridor over the next 10-15 years? Priorities may include (i) working with developers, the EA, Thames Water, the South East Rivers Trust and other stakeholders to improve water quality of the river, in particular lowering levels of phosphates and limiting sewage and road run-off and (ii) promoting restoration opportunities such as re- meandering, bank softening and regrading and installation of woody materials which can present improvements for biodiversity, flow diversity, water quality and flood risk"
5.76	Green infrastructure (GI)/ Urban greening Through future local plan policies, the improvements outlined for the river Wandle (for biodiversity, flood risk management, access, river quality and amenity) should be sought via enhancement of the river by restoration, for developments with main rivers within or on the red line boundary.	Insert additional bullet point under the heading of 'Green infrastructure (GI)/ Urban Greening' as follows: "How can Local Plan policies ensure that proposed developments located adjacent to main rivers contribute to the improvements outlined above for the River Wandle (for biodiversity, flood risk management, access, river quality and amenity) through river enhancement and restoration?"
5.99	Green corridors and linked habitats It is very positive to see that in potential development sites currently with no BNG value, assigning a potential area based provision of net gain to biodiversity where a percentage based on the original condition would be ineffective.... this potential solution is welcomed.	Noted
5.96	Biodiversity Net Gain Please note that the key issues noted for this topic identify that the Borough's approach to Local Nature Recovery Strategies (LNRS) should be aligned to BNG delivery. It should, however, be noted here that the LNRS covering Sutton will be produced on a London-wide scale https://www.london.gov.uk/programmes-strategies/environment-and-climate-change/parks-green-spaces-and-biodiversity/local-nature-recovery-strategy	Agreed: Footnote added to confirm that the NRS covering LB Sutton will be produced London-wide scale https://www.london.gov.uk/programmes-strategies/environment-and-climate-change/parks-green-spaces-and-biodiversity/local-nature-recovery-strategy

(2) Natural England comments on SA Scoping Report - 7 May 2024



Ref	Natural England Comment	Council Response
3	No specific comments	n/a

(3) Greenspace Information for Greater London (GiGL) comments on SA Scoping Report - 7 May 2024



GiGL

Greenspace Information for Greater London CIC
the capital's environmental records centre

Sent via email to: planningpolicy@sutton.gov.uk, patrick.whitter@sutton.gov.uk

11th June 2024

Dear Sir / Madam,

Re: Greenspace Information for Greater London CIC's response to LB Sutton's Consultation on the Sustainability Appraisal (SA) Scoping Report

Greenspace Information for Greater London CIC ([GiGL](#)) is a social enterprise, and represents London in a UK-wide network of local environmental records centres (LERCs), working to standards set by the Association of Local Environmental Records Centres ([ALERC](#)) and the National Biodiversity Network (NBN). We mobilise, curate and share access to high-quality data via services that enable our stakeholders to make informed decisions about London's natural environment in policy and practice. GiGL, as a well established and trusted organisation working in London since 1998, has access to a huge network of recorders and data providers.

We would like to thank you for the opportunity to provide our comments so early in the process. LB Sutton as one of GiGL's Service Level Agreement (SLA) [partners](#) has access to GiGL's robust evidence base which includes [datasets](#) of protected, priority, invasive and other species, statutory sites, Sites of Importance for Nature Conservation (SINCs), Open Spaces, Geodiversity, Habitats, Areas of Deficiency (AoD) in Access to Nature and AoD to Public Open Spaces. We would therefore be happy to support LB Sutton in the future by providing the necessary information for the assessment of potential effects of the plan and policy options, performing required analysis (provided the necessary data have been shared in appropriate formats) and preparing appropriate outputs for the Sustainability Appraisal (e.g. maps, statistics, AoD predictive modelling, etc.).

In our response below, we provide some general information on the use of data and data sharing that we believe are important to consider when preparing a Local Plan and thinking about how it will be assessed. We have also included some examples referring to specific sections of the report. These are not exhaustive and we could discuss further about any analysis and mapping that we could do.

Developers and their consultants have access to data search reports through our [data search report service](#). These pdf reports bring together the wealth of information that GiGL holds in an interpreted product providing a thorough overview of the natural environment of a site and its surrounding areas. Ecological consultants who have consulted a data search report have accessed a robust evidence base, have taken into account the local context of a site and have followed best professional practice as set out by the Chartered Institute of Ecology and Environmental Management (CIEEM).

In 2016, a [project](#) by the Mayor of London concluded that around 18% of planning applications in a year in London should have been supported by a biodiversity data search, based on a set of criteria used to assess the potential impacts of the proposed developments on biodiversity. However, only 1% of the applications that were validated were accompanied by a GiGL data search report during the same period. Figures published by GiGL since (see our [map](#)), show that these numbers are still very low and considerably more planning applications should be supported by a data search report, indicating that Local

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Planning Authorities (LPAs) and developers might be missing potential ecological impacts of planning applications and LPAs need to scrutinise ecological aspects of planning applications more. In November 2023, we published a [report](#) for LPAs presenting these numbers and suggesting ways of improving the process. LB Sutton was featured in the report as a case study as your numbers have been steadily increasing. Therefore, monitoring these numbers could be a good indicator of developers taking into account the existing evidence base and making informed decisions to improve the natural environment.

Consulting the existing evidence base through a data search report is also in accordance with the below policies, best practice and recommendations:

- [National Planning Policy Framework](#) (December 2023) ([link](#))
 - Paragraph 43: *The right information is crucial to good decision-making, particularly where formal assessments are required ...*.
 - Paragraph 44: *Local planning authorities should publish a list of their information requirements for applications for planning permission. ...*.
- [London Plan](#) (2021) ([link](#))
 - *should manage impacts on biodiversity and Policy G6 Biodiversity and access to nature: D – “Development proposals aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process.”*
- [Defra guidance: Complying with the biodiversity duty](#) (May 2023) ([link](#))
 - Prepare for biodiversity net gain: *“You can get existing local data from [Local Environmental Record Centres](#). If you commission research, you can share that data with them.”*
- [Geospatial commission’s report](#) (May 2021)
 - Data Use Recommendations: 13. *“Require proponents of development to certify that best available species data through the BDF have been accessed in the preparation of applications where there is risk of impact on biodiversity, potentially through new regulation. This will help ensure that existing and newly collected species data is equally available to project proponents, regulators and evaluators and will support environmental outcomes”. (BDF: Biodiversity Data framework)*
- [Guidelines For Accessing, Using and Sharing Biodiversity Data In The UK](#) (March 2020), CIEEM ([link](#))
- [Guidelines for Preliminary Ecological Appraisal](#) (December 2017), CIEEM ([link](#))
 - Appendix 2. Desk Studies (p. 14) *“In the majority of cases it will be appropriate to also obtain information in the UK from the Local Environmental Records Centre (LERC⁴⁰); (...); or equivalent on non-statutory designated sites⁴¹ and existing records of protected and priority species. In the UK, background data searches will generally not be considered adequate by the Local Planning Authority or other regulatory authority if they rely entirely on open access data, as some of these datasets are not necessarily comprehensive or are not at a fine enough resolution to inform local decisions”.*

To close the loop, sharing of data from development is also very important to enhance and improve the existing evidence base, allow for complimentary enhancements and ensure data are re-used in decision making, whether it’s at a local plan level or at a specific development level. We are currently looking into how we can work with LPAs so we can collate the data

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from development (e.g. species, habitats, green infrastructure, etc.) and BNG delivery (onsite BNG baseline information and plans for gain delivery). Sharing of data following appropriate [data standards](#) (as also briefly mentioned in §5.103 of the report) with GiGL will also enable us to support you with the necessary information for your biodiversity duty reporting, as well as with assessing potential effects of the plan and policy options. We believe that in order for this to work, it should be a mandatory requirement and since it is not a requirement at a national level yet, it should be at a regional/local level. As also pointed out in the report the 'updated NPPF (December 2023) confirms that an up-to-date evidence base is essential for producing a sound Local Plan'.

Data sharing is in accordance with the below guidance, best practice and recommendations:

- [Guidelines For Accessing, Using and Sharing Biodiversity Data In The UK \(March 2020\)](#) ([link](#))
 - 1. *"It is expected that following the completion of surveys, all relevant biodiversity data obtained will be submitted to the relevant LERCs and other groups as appropriate, unless the client has expressly refused permission for this¹². A statement to this effect should be included in the consultants' Terms and Conditions. Data can be submitted direct to the LERC. Note that where a protected species licence is required, submission of such data by the stated deadline is a requirement of the licence."*
- [Guidelines For Ecological Impact Assessment In The UK and Ireland Terrestrial, Freshwater, Coastal and Marine](#) (updated April 2022) ([link](#))
 - 14 *"Account needs to be taken of existing information and understanding, in conjunction with the results of EclAs undertaken elsewhere. CIEEM encourages all practitioners to share data and results, for example through Local Record Centres (LRCs) in Britain²⁷..."*
- [Defra guidance: Complying with the biodiversity duty](#) (May 2023) ([link](#))
 - Prepare for biodiversity net gain: *"You can get existing local data from Local Environmental Record Centres. If you commission research, you can share that data with them."*
- [Biodiversity gain plan](#) (March 2024) ([link](#))
 - Section 10: Sharing data (optional): *"Can we share your ecological survey data with the Local Environmental Records Centre or other bodies?"*
- [Geospatial commission's](#) (May 2021) [report](#)
 - Data Use Recommendations: 12. *"Mandate the re-use of species data collected by consultants in transparent processes that support regulatory compliance, potentially through new regulation. This will reduce survey costs, improve professional standards and support environmental outcomes"*.

Paragraph 5.84 in the report poses the question: *"Should the Local Plan go further in requiring developers to make increased use of planting, green biodiverse roofs, SuDS measures and other 'nature-based solutions' as part of the design and layout of new buildings to the creation of wider green infrastructure linkages and flood risk management measures both at the neighbourhood/catchment scale and over wider areas?"*. We believe that any enhancements, including net gains and urban greening, should be informed by the local context and be complimentary of other delivery work that is happening in the area. Evaluating the effectiveness of any related measures will only be possible if the required data are shared in appropriate formats, as mentioned above.

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Furthermore, paragraph 5.77 mentions: "Should the Local Plan seek to incorporate a Borough-wide strategy for the provision of 'Pocket Parks' and what criteria should be used to identify suitable locations? Options include identified areas of deficiency to open space; areas of deficiency to nature conservation sites; surface water flooding hotspots; areas vulnerable to heatwaves and the urban heat island (UHI) effect; areas with a higher proportion of residents vulnerable to climate impacts; air quality focus areas (AQFAs)". GiGL could support this work by performing Areas of Deficiency (AoD) predictive modelling in order to investigate changes on AoD based on potential changes to access or provision to Open Space and/or Nature.

We would also like to provide two clarifications to GiGL references:

- In page 88, in the first commentary box, when referring to the BNG pilot projects that we worked on with LB Sutton: We would like to be noted that default values were used for the condition and strategic significance scores after consultation with our contacts in the LPA. More accurate condition scoring can be added when the appropriate condition assessments have been performed for specific areas. Similarly, specific strategic significance scores can be added for areas once these have been defined, either by LB Sutton or once London's Local Nature Recovery Strategy has been published.
- We also noticed that our name is spelled in a couple of different ways in the report, so we would like to take the opportunity to share the correct spelling which is 'Greenspace Information for Greater London CIC (GiGL)'.

Further information on GiGL data and the planning application process can be found in our [Planning for Nature](#) webpage and associated subpages.

We would be very happy to discuss our consultation response in more detail.

Yours faithfully,



Eleni Foui
Senior Partnership Officer (Planning)

Ref	GiGL Comment	Council Response
Para 2	<p>LB Sutton as one of GiGL's Service Level Agreement (SLA) partners has access to GiGL's robust evidence base which includes datasets of protected, priority, invasive and other species, statutory sites, Sites of Importance for Nature Conservation (SINCs), Open Spaces, Geodiversity, Habitats, Areas of Deficiency (AoD) in Access to Nature and AoD to Public Open Spaces. We would therefore be happy to support LB Sutton in the future by providing the necessary information for the assessment of potential effects of the plan and policy options, performing required analysis (provided the necessary data have been shared in appropriate formats) and preparing appropriate outputs for the Sustainability Appraisal (e.g. maps, statistics, AoD predictive modelling, etc.).</p>	<p>Noted</p>
Para 4	<p>Developers and their consultants have access to data search reports through our data search report service. These pdf reports bring together the wealth of information that GiGL holds in an interpreted product providing a thorough overview of the natural environment of a site and its surrounding areas. Ecological consultants who have consulted a data search report have accessed a robust evidence base, have taken into account the local context of a site and have followed best professional practice as set out by the Chartered Institute of Ecology and Environmental Management (CIEEM).</p>	<p>Noted</p>
Para 5	<p>In 2016, a project by the Mayor of London concluded that around 18% of planning applications in a year in London should have been supported by a biodiversity data search, based on a set of criteria used to assess the potential impacts of the proposed developments on biodiversity. However, only 1% of the applications that were validated were accompanied by a GiGL data search report during the same period. Figures published by GiGL since (see our map), show that these numbers are still very low and considerably more planning applications should be supported by a data search report, indicating that Local Planning Authorities (LPAs) and developers might be missing potential ecological impacts of planning applications and LPAs need to scrutinise ecological aspects of planning applications more. In November 2023, we published a report for LPAs presenting these numbers and suggesting ways of improving the process. LB Sutton was featured in the report as a case study as your numbers have been steadily increasing. Therefore, monitoring these numbers could be a good indicator of developers taking into account the existing evidence base and making informed decisions to improve the natural environment.</p>	<p>Agreed: Insert an additional issue as follows as Parav 5.42 of Section 5 of the SA Report on 'Key Issues' as follows:</p> <p><u>"The need for the Local Plan to ensure that developers do not overlook the potential ecological impacts of planning applications by ensuring that a much higher proportion of proposed developments are accompanied by a biodiversity data search; and to make developers aware of the facility provided by GiGL. (although around 18% of planning applications in London in 2016 should have been supported by a biodiversity data search, only 1% were accompanied by a GiGL data search report)".</u></p>
Para 6	<p>Consulting the existing evidence base through a data search report is also in accordance with the below policies, best practice and recommendations:</p> <p>National Planning Policy Framework (December 2023)</p> <ul style="list-style-type: none"> Paragraph 43: 'The right information is crucial to good decision-making, particularly where formal assessments are required ...'. Paragraph 44: "Local planning authorities should publish a list of their information requirements for applications for planning permission. ...". <p>London Plan (2021)</p> <ul style="list-style-type: none"> should manage impacts on biodiversity and Policy G6 Biodiversity and access to nature: D – "Development proposals aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process." <p>Defra guidance: Complying with the biodiversity duty (May 2023)</p> <ul style="list-style-type: none"> Prepare for biodiversity net gain: "You can get existing local data from Local Environmental Record Centres. If you commission research, you can share that data with them." <p>Geospatial commission's report (May 2021)</p> <ul style="list-style-type: none"> Data Use Recommendations: 13. "Require proponents of development to certify that best available species data through the BDF have been accessed in the preparation of applications where there is risk of impact on biodiversity, potentially through new regulation. This will help ensure that existing and newly collected species data is equally available to 	<p>Noted: The policies, best practice examples and recommendations will be taken into account in the preparation of the Draft Local Plan Proposed Submission (Regulation 19) for public consultation in early to mid 2025.</p>

Ref	GiGL Comment	Council Response
	<p>project proponents, regulators and evaluators and will support environmental outcomes". (BDF: Biodiversity Data framework)</p> <p>Guidelines For Accessing, Using and Sharing Biodiversity Data In The UK (March 2020), CIEEM</p> <p>Guidelines for Preliminary Ecological Appraisal (December 2017), CIEEM</p> <ul style="list-style-type: none"> Appendix 2. Desk Studies (p. 14) <i>"In the majority of cases it will be appropriate to also obtain information in the UK from the Local Environmental Records Centre (LERC40); (...); or equivalent on non-statutory designated sites⁴¹ and existing records of protected and priority species. In the UK, background data searches will generally not be considered adequate by the Local Planning Authority or other regulatory authority if they rely entirely on open access data, as some of these datasets are not necessarily comprehensive or are not at a fine enough resolution to inform local decisions"</i>) 	
Paras 7 and 8	<p>To close the loop, sharing of data from development is also very important to enhance and improve the existing evidence base, allow for complimentary enhancements and ensure data are re-used in decision making, whether it's at a local plan level or at a specific development level. We are currently looking into how we can work with LPAs so we can collate the data from development (e.g. species, habitats, green infrastructure, etc.) and BNG delivery (onsite BNG baseline information and plans for gain delivery). Sharing of data following appropriate data standards (as also briefly mentioned in para 5.103 of the report) with GiGL will also enable us to support you with the necessary information for your biodiversity duty reporting, as well as with assessing potential effects of the plan and policy options.</p> <p>We believe that in order for this to work, it should be a mandatory requirement and since it is not a requirement at a national level yet, it should be at a regional/local level. As also pointed out in the report the 'updated NPPF (December 2023) confirms that an up-to-date evidence base is essential for producing a sound Local Plan'. Data sharing is in accordance with the below guidance, best practice and recommendations:</p> <p>Guidelines For Accessing, Using and Sharing Biodiversity Data In The UK (March 2020)</p> <ul style="list-style-type: none"> 1. "It is expected that following the completion of surveys, all relevant biodiversity data obtained will be submitted to the relevant LERCs and other groups as appropriate, unless the client has expressly refused permission for this. A statement to this effect should be included in the consultants' Terms and Conditions. Data can be submitted direct to the LERC. Note that where a protected species licence is required, submission of such data by the stated deadline is a requirement of the licence." <p>Guidelines For Ecological Impact Assessment In The UK and Ireland Terrestrial, Freshwater, Coastal and Marine (updated April 2022)</p> <ul style="list-style-type: none"> 14 "Account needs to be taken of existing information and understanding, in conjunction with the results of EclAs undertaken elsewhere. CIEEM encourages all practitioners to share data and results, for example through Local Record Centres (LRCs) in Britain Defra guidance: Complying with the biodiversity duty (May 2023) (link) o Prepare for biodiversity net gain: "You can get existing local data from Local Environmental Record Centres. If you commission research, you can share that data with them <p>Biodiversity gain plan (March 2024)</p> <ul style="list-style-type: none"> Section 10: Sharing data (optional): "Can we share your ecological survey data with the Local Environmental Records Centre or other bodies?" • Geospatial commission's (May 2021) report 	<p>Agreed: Insert an additional issue as follows as Parav 5.42 of Section 5 of the SA Report on 'Key Issues' as follows:</p> <p><u>"Should mandatory requirements be introduced requiring developers share biodiversity data and ecological surveys"</u></p> <p>Mandatory requirements for the sharing of biodiversity data will be taken into account in the preparation of the Draftv Local Plan Proposed Submission (Regulation 19) for public consultation in early to mid 2025.</p>

Ref	GiGL Comment	Council Response
	<ul style="list-style-type: none"> Data Use Recommendations: <i>“Mandate the re-use of species data collected by consultants in transparent processes that support regulatory compliance, potentially through new regulation. This will reduce survey costs, improve professional standards and support environmental outcomes”.</i> 	
Para 9 (re: Para 5.84)	Paragraph 5.84 in the report poses the question: “Should the Local Plan go further in requiring developers to make increased use of planting, green biodiverse roofs, SuDS measures and other ‘nature-based solutions’ as part of the design and layout of new buildings to the creation of wider green infrastructure linkages and flood risk management measures both at the neighbourhood/catchment scale and over wider areas?”. We believe that any enhancements, including net gains and urban greening, should be informed by the local context and be complimentary of other delivery work that is happening in the area. Evaluating the effectiveness of any related measures will only be possible if the required data are shared in appropriate formats, as mentioned above.	Noted
Para 9 (re: Para 5.77)	Furthermore, paragraph 5.77 mentions: “Should the Local Plan seek to incorporate a Borough-wide strategy for the provision of ‘Pocket Parks’ and what criteria should be used to identify suitable locations? Options include identified areas of deficiency to open space; areas of deficiency to nature conservation sites; surface water flooding ‘hotspots; ‘areas vulnerable to heatwaves and the urban heat island (UHI) effect; areas with a higher proportion of residents vulnerable to climate impacts; air quality focus areas (AQFAs)”. GiGL could support this work by performing Areas of Deficiency (AoD) predictive modelling in order to investigate changes on AoD based on potential changes to access or provision to Open Space and/or Nature.	Noted
Para 10	In page 86, in the first commentary box, when referring to the BNG pilot projects that we worked on with LB Sutton: We would like to be noted that default values were used for the condition and strategic significance scores after consultation with our contacts in the LPA. More accurate condition scoring can be added when the appropriate condition assessments have been performed for specific areas. Similarly, specific strategic significance scores can be added for areas once these have been defined, either by LB Sutton or once London’s Local Nature Recovery Strategy has been published. • ‘	<p>Agreed: The following additional sentence has been inserted within the first commentary box.</p> <p><u>“It should be noted that default values were used for the ‘condition’ and ‘strategic significance’ scores after consultation with our contacts in the LPA. More accurate condition scoring will be achievable once the appropriate condition assessments have been performed for specific areas. Similarly, specific strategic significance scores can be added for areas once these have been defined, either by LB Sutton or once London’s Local Nature Recovery Strategy has been published.”</u></p>
Para 11	We also noticed that our name is spelled in a couple of different ways in the report, so we would like to take the opportunity to share the correct spelling which is ‘Greenspace Information for Greater London CIC (GiGL)’.	Agreed: Correct spelling inserted throughout the document as ‘Greenspace Information for Greater London CIC (GiGL)’

APPENDIX 2

Sutton Local Plan Review

HABITATS REGULATIONS (APPROPRIATE ASSESSMENT) SCREENING

Strategic Planning

Environment and Planning Division

London Borough of Sutton

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HABITATS REGULATIONS (APPROPRIATE ASSESSMENT) SCREENING

(1) Introduction

1.1 The requirement for Appropriate Assessment (AA) of plans or projects originated from Article 6(3) and (4) of the European Communities (1992) Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (known as the 'Habitats Directive').

1.2 The aim of the Habitats Directive was to conserve natural habitats and wild species across Europe by establishing a network of sites known as Natura 2000 sites. Under Article 6(3) of the Habitats Directive, an 'appropriate assessment' (AA) was required where a plan or project is likely to have a significant effect upon a European site, either individually or in combination with other projects. Further to this, Article 6(4) states that where an appropriate assessment has been carried out and results in a negative assessment (in other words, the development will adversely affect the site(s) despite any proposed avoidance or mitigation measures or if uncertainty remains), consent will only be granted if there are no alternative solutions, there are Imperative Reasons of Overriding Public Interest (IROPI) for the development, and compensatory measures have been secured.

1.3 Although the UK departed from the European Union (EU) in 2020, the protections afforded by the Habitats Directive are incorporated into UK legislation through the Habitats Regulations 2010 (as amended). The Regulations are responsible for safeguarding designated European sites within the UK and therefore for protecting the habitats and species listed in the Annexes of the Directive. These include Special Areas of Conservation (SACs), Special Protection Areas (SPAs), Ramsar sites and sites identified, or required, as compensatory measures for adverse effects on any of the above sites.

1.4 The purpose of undertaking AA in the preparation of land use plans is to ensure that the protection and integrity of European sites is part of the planning process at the regional and local level. In October 2005, the European Court of Justice ruled that AA must be carried out on all land use planning documents in the UK. In response to this ruling, a new section¹ (Part IVA) was inserted into the Habitats Regulations in August 2007 (Regulations 85A -85E) which requires local planning authorities to undertake AA of land use plans in England and Wales in accordance with the Directive..

(2) Habitats Regulations (Appropriate Assessment) Screening of Sutton's Local Plan

2.1 Screening of Sutton's current Local Plan 2018 was carried out during 2017 by the Council at the 'Issues and Preferred Options' stage in accordance with the requirements of the Habitats Regulations in order to ensure that the protection and integrity of the following European sites was included as part of the plan preparation process:

- Richmond Park SAC;
- Wimbledon Common SAC;
- Mole Gap to Reigate Escarpment SAC; and
- Ockham and Wisley Commons SSSI (part of Thames Basin Heaths SPA).

2.2 All of these sites lies beyond the boundaries of the London Borough of Sutton.

2.3 The full AA screening report was included as Appendix 4 of the Sustainability Appraisal (SA) Report which was published for public consultation alongside Sutton's Local Plan 'Issues and Preferred Options' document between 18 February and 8 April 2016.

2.4 At that time, HRA screening against the nine assessment criteria indicated that none of the preferred options, strategic alternatives or draft policies put forward in the 'Issues and Preferred Options' document would have either a 'potential' or 'significant effect' upon a European Site as described under criteria 8 or 9 below:

- **Criterion 8 (Reason why policy could have a potential effect):** The preferred option or draft policy

¹ entitled 'Appropriate Assessments for Land Use Plans in England and Wales'.

steers a quantum or type of development towards, or encourages development in, an area that includes a European site or an area where development may indirectly affect a European site;

- **Criterion 9 (Reason why policy would likely to have a significant effect):** The policy makes provision for a quantum, or kind of development that in the location(s) proposed would be likely to have a significant effect on a European site. The proposal must be subject to appropriate assessment to establish, in light of the site's conservation objectives, whether it can be ascertained that the proposal would not adversely affect the integrity of the site

2.5 The Council therefore concluded that a full Habitats Regulations Assessment (Appropriate Assessment) would not need to be prepared in support of the Draft Local Plan (Proposed Submission) which was eventually consulted upon 9 January and 24 February 2017.

(3) Outcome of previous consultation with Natural England (Statutory Consultee)

3.1 As can be seen from the attached email correspondence, Natural England (NE) supported the Council's screening conclusion, stating that

"Having taken a look at the HRA screening assessment it does appear that there wouldn't be an impact upon the designated sites highlighted within the report as there isn't a direct impact pathway due to the distances involved".

(4) Conclusions

4.1 In the light of the previously published AA screening report and the views of Natural England, the Council did not prepare a full Habitats Regulations (Appropriate Assessment) Report as part of the preparation of the current Local Plan 2018. The Council's position (that a full HRA was not required) was scrutinised by the Planning Inspector at the subsequent Examination-in-Public (EiP) on the Local Plan held in September 2017, and was found to be consistent with the delivery of a 'sound' Plan.

4.2 However, it is intended that the HRA screening process will be revisited in further detail and in the light of updated data, at the next stage of preparation of the new Local Plan (Regulation 19 consultation on the Draft Local Plan Proposed Submission) during 2025.

ANNEX

E-Mail Correspondence between LB Sutton and Naural England Regarding Outcome of Habitats Regulations (Appropriate Assesment) on Local Plan 'Issues and Preferred Options'.

[REDACTED]

From: Behnke, Piotr (NE) [REDACTED]
Date: 21 October 2016 at 17:49
Subject: Natural England Response - URGENT!! Sutton Local Plan - Consultation on Local Plan Preferred Issues and Options (Feb-April 2016)
To: Patrick Whitter [REDACTED]
Cc: "Melvin, Jamie (NE)" [REDACTED]

Hi Patrick,

Having taken a look at the HRA screening assessment it does appear that there wouldn't be an impact upon the designated sites highlighted within the report as there isn't a direct impact pathway due to the distances involved.

One thing you may wish to take account of is that the South West London Water Bodies Special Protection Area (SPA) has a component site within 10km of the borough boundary (Knight & Bessborough Reservoirs Site of Special Scientific Interest [SSSI]) and this wasn't included within the screening assessment however given the distance and the fact that site is designated for its bird interest there isn't likely to be an impact. This would again be due to the distance as the site is right on the edge of the 10km buffer so is far enough away to not have any direct links to the plans and programmes going on in Sutton.

One thing which I would mention is that the use of the term "English Nature" within the screening assessment should be amended to "Natural England" given that name changed some 10 years ago now.

Regards,

Piotr Behnke
Adviser
Sustainable Development
Thames Valley Team

[REDACTED]

[REDACTED]

On 10 August 2016 at 11:02, Patrick Whitter [REDACTED] wrote:
Dear Mr Melvin,

You will recall that earlier this year you submitted consultation comments on behalf of Natural England on Sutton's Local Plan 'Preferred Issues and Options' document and the accompanying SA Report -see https://www.sutton.gov.uk/info/200464/planning_policy/1521/sutton_2031.

I note that in one of your comments, you stated that

"Natural England notes the intention to prepare a Habitats Regulations Screening Report alongside the next stage of consultation"

I just wanted to clarify that the Council has already prepared a Habitats Regulations (Appropriate Assessment) Screening Report on Sutton's emerging Local Plan and this was included as Appendix 4 of the SA Report on Issues and Preferred Options. The screening report concluded that a full Habitats Regulations Assessment (Appropriate Assessment) will not need to be prepared in support of the Draft Submission version of the Local Plan.

I would be extremely grateful if you could have another look at the Habitats Regulations (Appropriate Assessment) Screening Report via the above link and get back to me to confirm that there will therefore be no need to prepare a Habitats Regulations Screening Report alongside the next stage of consultation.

Regards

Patrick Whitter

Patrick Whitter
Senior Planner

Strategic Planning Team
Environment, Housing & Regeneration
London Borough of Sutton
24 Denmark Road,
Carshalton,
Surrey,
SM5 2JG
[REDACTED]

www.sutton.gov.uk

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[REDACTED]



Spencer Palmer Strategic Director
Environment, Housing and Neighbourhoods

London Borough of Sutton
Environment, Housing and Neighbourhoods
London Borough of Sutton
Civic Offices, St Nicholas Way
Sutton, SM1 1EA

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