



London Borough of Sutton
Local Plan

Sustainability Appraisal (SA) Scoping Report

April 2024



Sutton Local Plan Sustainability Appraisal Scoping Report

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

Representation Arrangements

1. The period for making representations on the Sustainability Appraisal (SA) Scoping Report is five weeks, from 7 May to 11 June 2024 **All comments must be received by 17:00 on Tuesday 11 June 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:

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Environment and Planning Division,
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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 Patrick Whitter on 075 0605 6375.
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) Scoping Report has been prepared in order to identify the key sustainability issues likely to be affected by Sutton's new Local Plan and to provide the basis for appraising the environmental, social and economic effects of emerging planning policy options and alternatives.

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) will follow the procedures and key tasks set out in the Government's Planning Practice Guidance and best practice. This SA Scoping Report presents the outcome of Stage A (Tasks A1 to A5) on 'Setting the Context and Objectives, Establishing the Baseline and Deciding on the Scope'.

Section 1 provides an **Introduction** to the SA Scoping Report in terms of the background to the appraisal, definitions of sustainable development, planning for sustainability and the purpose of the SA Scoping Report.

Section 2 sets out the **Appraisal Methodology** to be followed in terms of Government guidance, the main stages of SA and the key outputs of the appraisal process.

Section 3 identifies **Other Relevant Plans, Programmes and Sustainability Objectives (Task A1)** which are likely to influence the options to be considered in the preparation of the Local Plan. These are covered at the international, national, regional and local levels. A more detailed 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 initial evidence-gathering stage of the Local Plan process and Sutton's Authority Monitoring Report (AMR). The key social, economic and environmental characteristics and trends likely to be affected by the Local Plan are described in order to provide the the basis for identifying sustainability issues/ problems and for predicting and monitoring effects.

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

Section 6 puts forward the proposed **Sustainability Appraisal Framework (Task A4)** as the basis for predicting and monitoring 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. An overview of the core sustainability objectives making up the Council's proposed SA Framework is provided overleaf.

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). Accordingly, the Council has undertaken informal engagement with key environmental stakeholders throughout the preparation of this SA Scoping Report since the production of an initial draft in September 2023. This ongoing engagement process 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, the finalised SA Scoping Report has now been published for consultation for five weeks from 7 May to 11 June 2024.. In line with the Regulations, copies have been provided for the following 'consultation bodies' to seek their input on the proposed scope:

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

Copies have also been sent to a range of appropriate authorities and local environmental stakeholders, including the Greater London Authority (GLA), Green Space Information for Greater London (GiGL), neighbouring South London Partnership Boroughs (Croydon, Merton and Kingston), South East Rivers Trust and Eco-Local, Feedback will inform the appraisal of Sutton's Local Plan 'Issues & Preferred Options, which will shortly be published for consultation (Regulation 18).

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

(A) ENVIRONMENTAL SUSTAINABILITY
(1) CLIMATE CHANGE MITIGATION/ ZERO CARBON Core SA Objective: To address the causes of climate change by minimising CO ₂ 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 CO ₂ emissions from transport and promote healthy streets
(B) SUSTAINABLE ECONOMIC GROWTH
(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) LONDON CANCER HUB (LCH), SUTTON LINK 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.
(C) SUSTAINABLE COMMUNITIES
(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>

WHAT IS SUSTAINABLE DEVELOPMENT?

1.6 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.

1.7 While many alternative definitions for sustainable development have been used over recent decades, the UK Environmental Strategy (DEFRA, 2018)⁸ makes reference to the following 17 goals which form the basis for the UN 2030 Agenda for Sustainable Development (A/RES/70/1, 2016)⁹:

- **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.

1.8 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:

(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.

⁸ 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>

⁹ 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>

(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.

1.9 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

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

1.11 In addition, SAs should incorporate the requirements of the UK Strategic Environmental Assessment (SEA) Regulations 2004¹⁰, 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.

1.12 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

1.13 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.

1.14 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.

1.15 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.

1.16 SA also helps planners and the public gain a better understanding of the inter-relationships between the aims of social inclusion, environmental protection, the use of natural resources and economic growth.

1.17 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.

¹⁰ 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

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

1.19 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.

PURPOSE OF SCOPING REPORT

1.20 The Scoping Report (this document) sets out the results of the initial stage of SA for Sutton's emerging Local Plan (Stage A). By identifying the policy context, existing baseline conditions within the Borough, key sustainability issues to be addressed by the plan and the Council's proposed 'SA Framework' – consisting of a range of sustainability objectives, indicators and targets as the basis for assessing the likely effects of alternative policy options - this report seeks to determine the overall scope of the appraisal.

1.21 This 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 and Sustainability Objectives (Task A1);**
- **Section 4: The Environmental, Social and Economic Baseline for Sutton (Task A2);**
- **Section 5: Key Sustainability Issues (Task A3);**
- **Section 6: The Sustainability Appraisal Framework for Sutton's New Local Plan (Task A4); and**
- **Section 7: Next Steps.**

EQUALITIES IMPACT ASSESSMENT

1.22 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 undertake or publish 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.

1.23 Since many of the issues to be addressed as part of the wider plan appraisal process will inevitably overlap with the consideration of potential impacts upon equalities groups, it is proposed to integrate the requirements of EqIA as part of the SA.

HABITATS REGULATIONS ASSESSMENT (APPROPRIATE ASSESSMENT)

1.24 The need for habitats regulations assessment¹¹ (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 Conservation of Habitats and Species Regulations 2010 (as amended)¹². The Regulations 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.

1.25 Under the Regulations, local planning authorities must undertake an HRA in line with the Habitats Directive where a plan or project is likely to have a 'significant effect' upon a European 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 Local Plan Issues and Preferred Options which will be published for consultation later in 2024.

¹¹ Habitats Regulations Assessment (HRA) is also commonly referred to as 'Appropriate Assessment'

¹² 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 2023¹²

CONSULTATION ARRANGEMENTS

1.26 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)¹³. In line with the SEA Regulations, copies of the SA Scoping Report have been provided for the four 'consultation bodies' in order to seek their views and comments on the proposed scope of the appraisal:

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

1.27 The Scoping Report has also be sent to a range of appropriate authorities and local stakeholders with environmental interests or responsibilities, including the GLA, Greenspace Information for Greater London (GiGL), South East Rivers Trust (formerly Wandle Trust, BioRegional and Sutton Nature Conservation Volunteers (SNCVs).

1.28 The Scoping Report has been made available at the following locations for a 5-week period from 2 May to 6 June 20 October to 30 November 2023:

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

1.29 Hard copies of the SA Scoping Report obtained by contacting Sutton's Strategic Planning Team on 075 0605 6375, by e-mail to planningpolicy@sutton.gov.uk or by writing to:

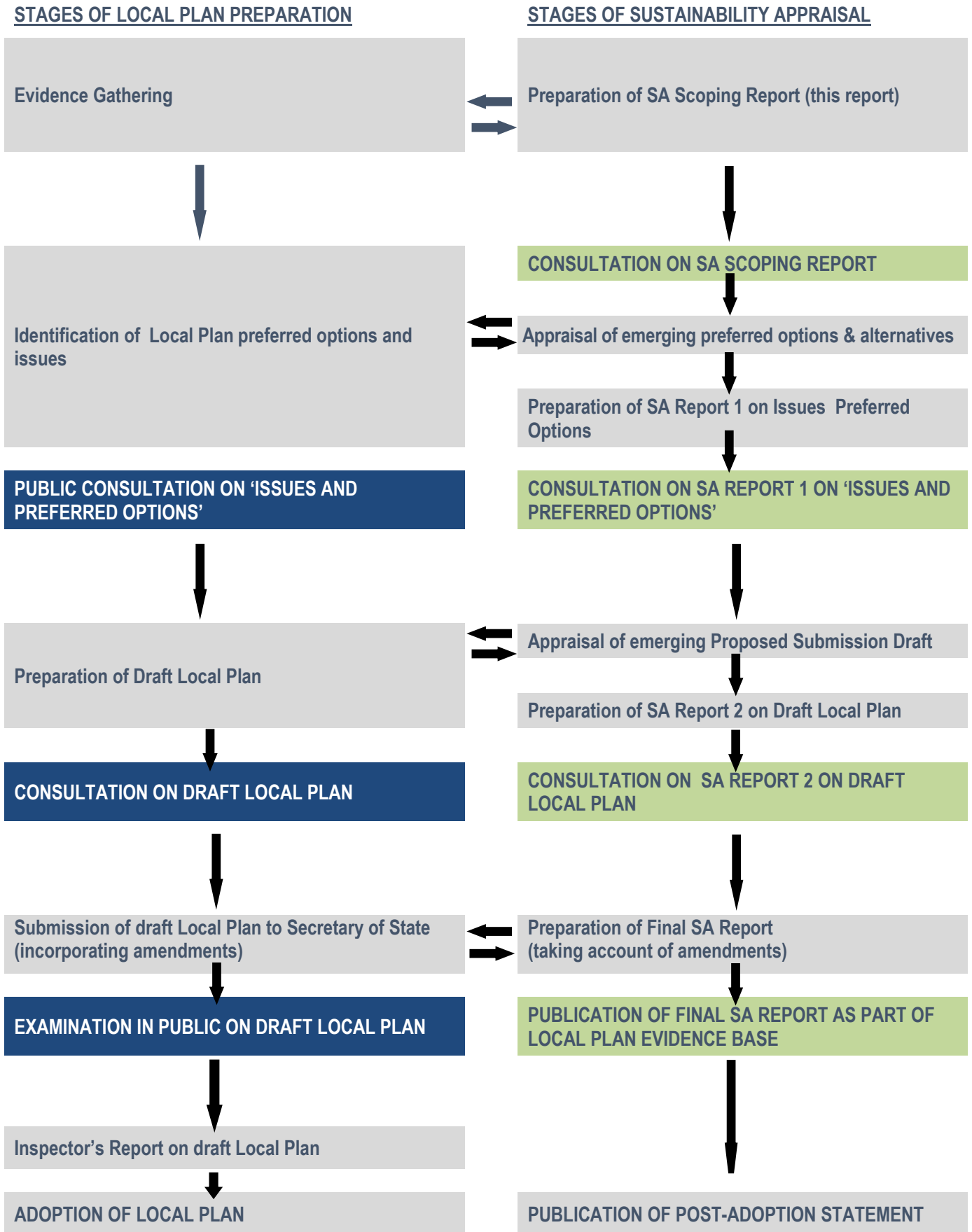
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1.30 Alternatively, this report can be viewed on the Council's website from 7 May 2024 at <http://www.sutton.gov.uk>.

¹³ Sutton's adopted Statement of Community Involvement (SCI) (Dec 2019) is available at https://drive.google.com/file/d/1bODFqsgdm_C6dN6SopgDFbliiAXSzmtD/view

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:

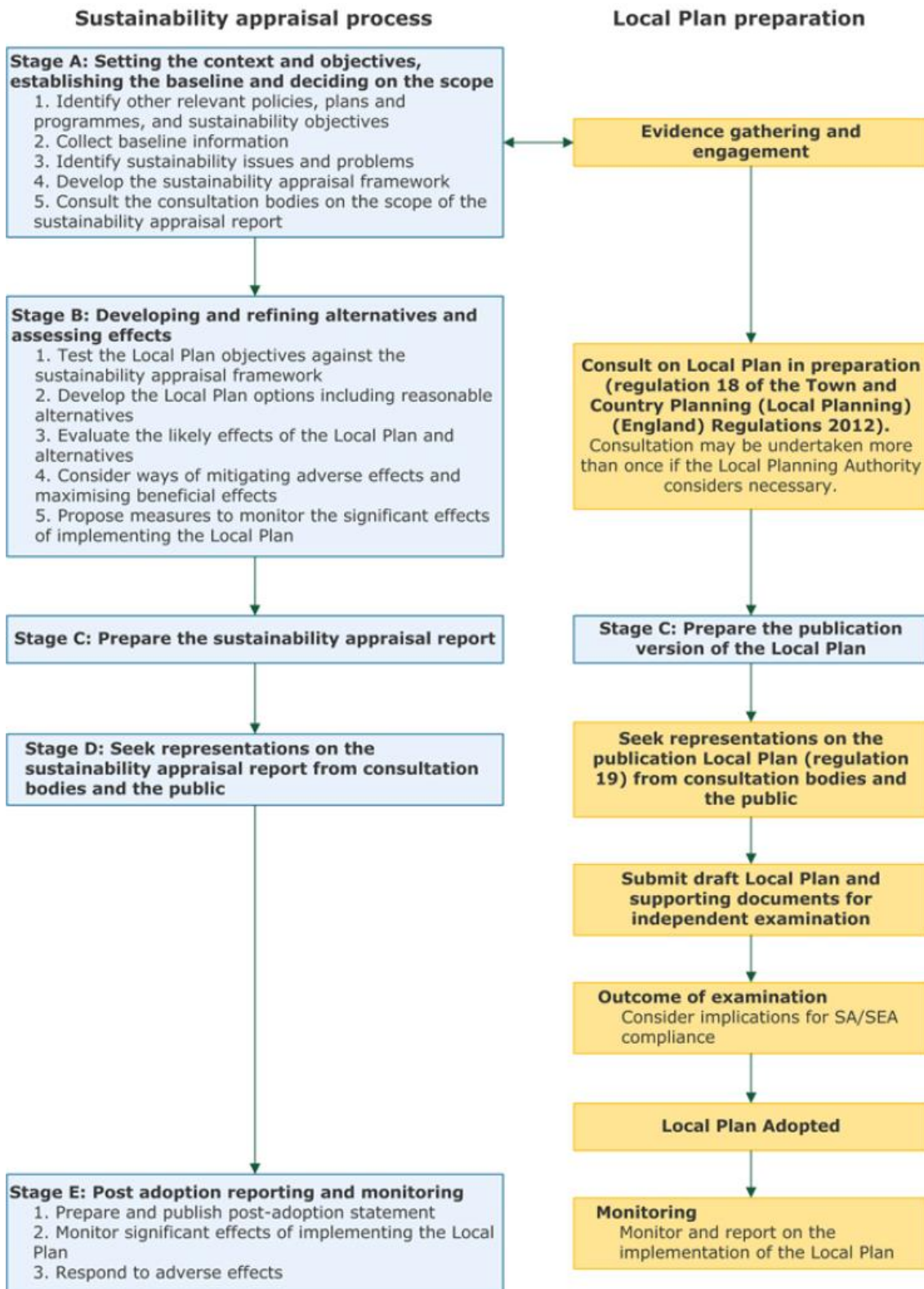
- **Task E1:** Finalising aims and methods for monitoring; and
- **Task E2:** Responding to adverse effects.

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) SA Stages A1-A5 	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;">SA Stages A1-A5</p>	June-July 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;">SA Stages C1 and D1</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;">SA Stage D2(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;">SA Stage D2(ii)</p>	June 2026
Post-adoption	<ul style="list-style-type: none"> • ongoing monitoring of Local Plan (via AMRs) <p style="text-align: right;">SA Stages E1 and E2</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. A more detailed analysis is provided in the Scoping Table included as Appendix 1, which considers how the relevant policy objectives and Council priorities relate to the key sustainability issues and problems identified in Section 5 of this document.

3.3 It should be noted 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

3.4 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

3.5 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

3.6 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.

3.7 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.

3.8 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.

3.9 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 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.

¹⁴ the Retained EU Law (Revocation and Reform) Bill, which received Royal Assent in January 2024, overhaul a body of UK law known as “retained EU law” That body of law, which includes a significant number of UK environmental regulations, was created by the EU (Withdrawal) Act 2018 (EUWA) as amended by the EU (Withdrawal Agreement) Act 2020 (EUWAA).

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;
- 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;
- 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 (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) updated June 2022.

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 Strategic Environmental Assessment (SEA) and Environmental Impact Assessment (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 with the new version afforded more weight than its predecessor;
- 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 through an open licence; 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.

National Planning Policy Framework (NPPF)

3.23 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.

3.24 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.

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

3.26 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

3.27 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.

3.28 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.

3.29 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.

3.30 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'.

3.31 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

3.32 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

3.33 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

3.34 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.

3.35 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.”

3.36 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)

3.37 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)

3.38 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

3.39 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)

3.40 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

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 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) 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);
- 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 on Local Plan Issues & Preferred Options which will be published for public consultation (Regulation 18) in June 2024.

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.

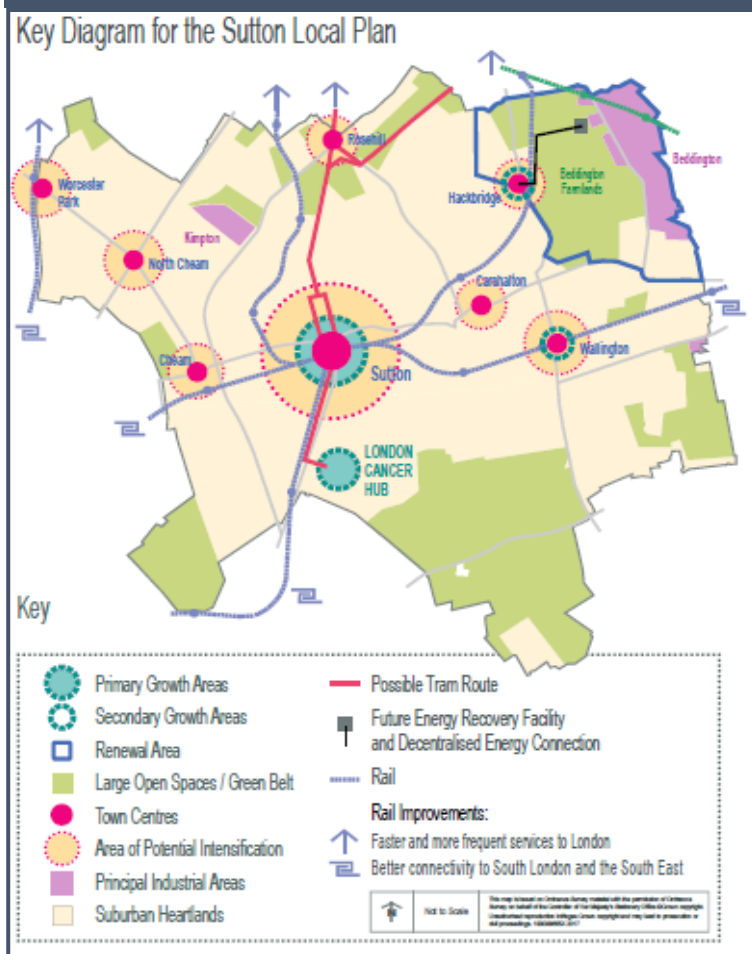
4.9. LB Sutton has number of high quality heritage areas designated as Conservation Areas and Areas of Special Local Character (ASLCs). There are extensive areas of low-density housing, mainly in the south of the Borough, which were mostly built in the 1920s and 1930s, characterised by large, detached 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 approximately 41.0 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

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/>

Biodiversity Action Plan (Open Space Strategy), the Wandle Regional Park and the London Green Grid.

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

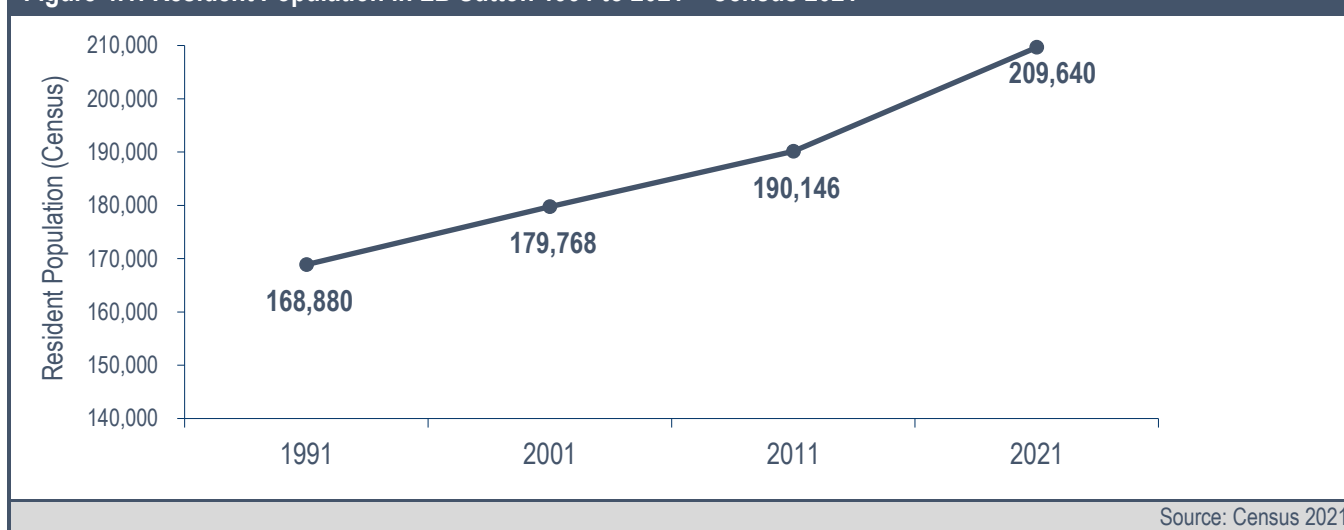
SUTTON’S POPULATION

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/>

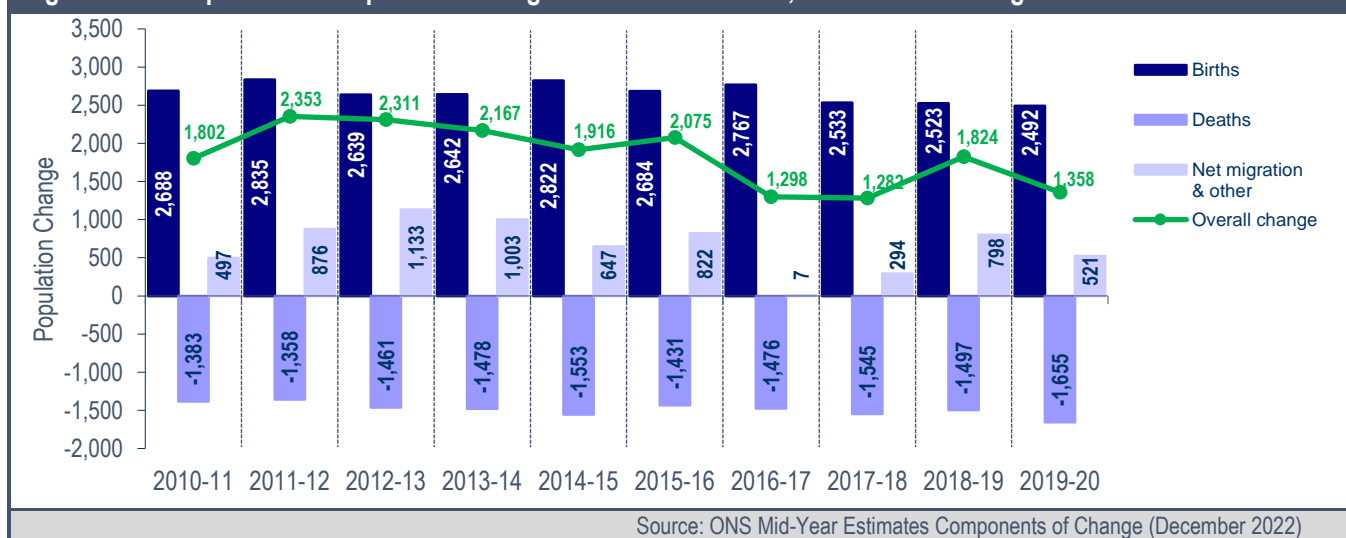
³⁸ ONS Mid-Year Estimates for 2021 published December 2022

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

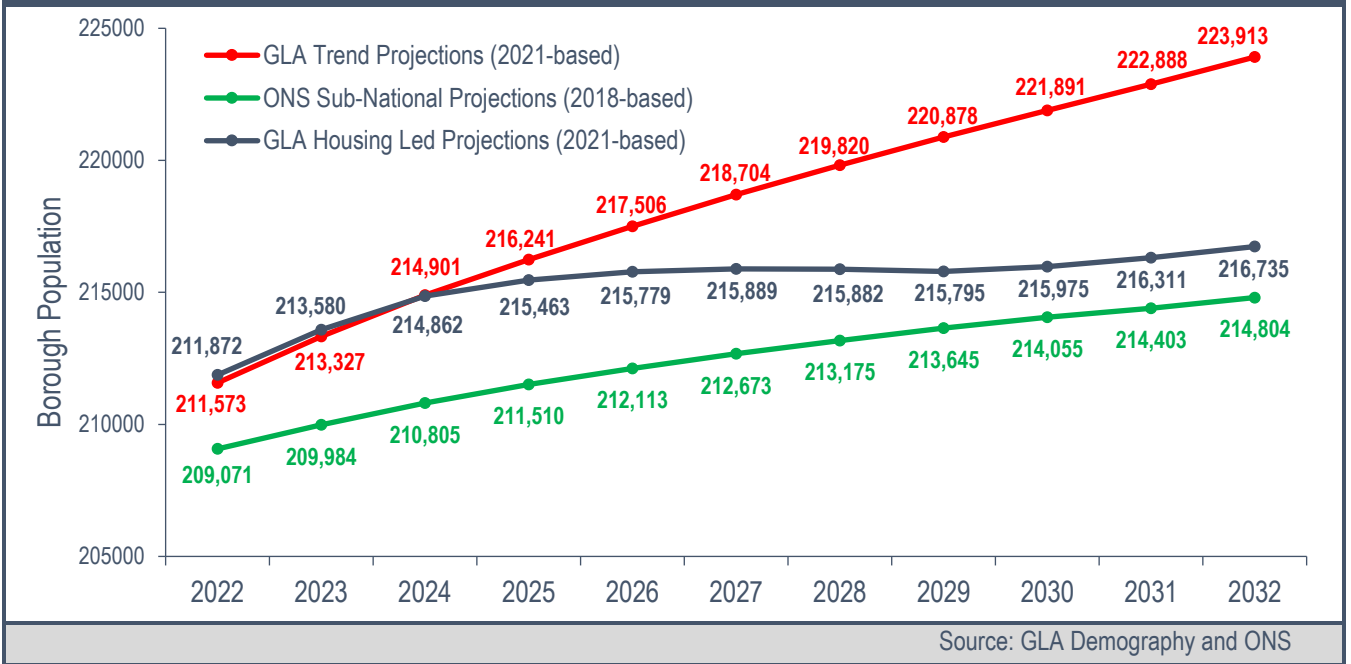
³⁹ the reported 'components of population change' feeding into the Mid-Year Estimates for 30 June 2021 are reported differently than for previous years. This is because the Borough population as recorded in the Census 2021 is assumed to be accurate and estimated figures for births, deaths and net migration 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>

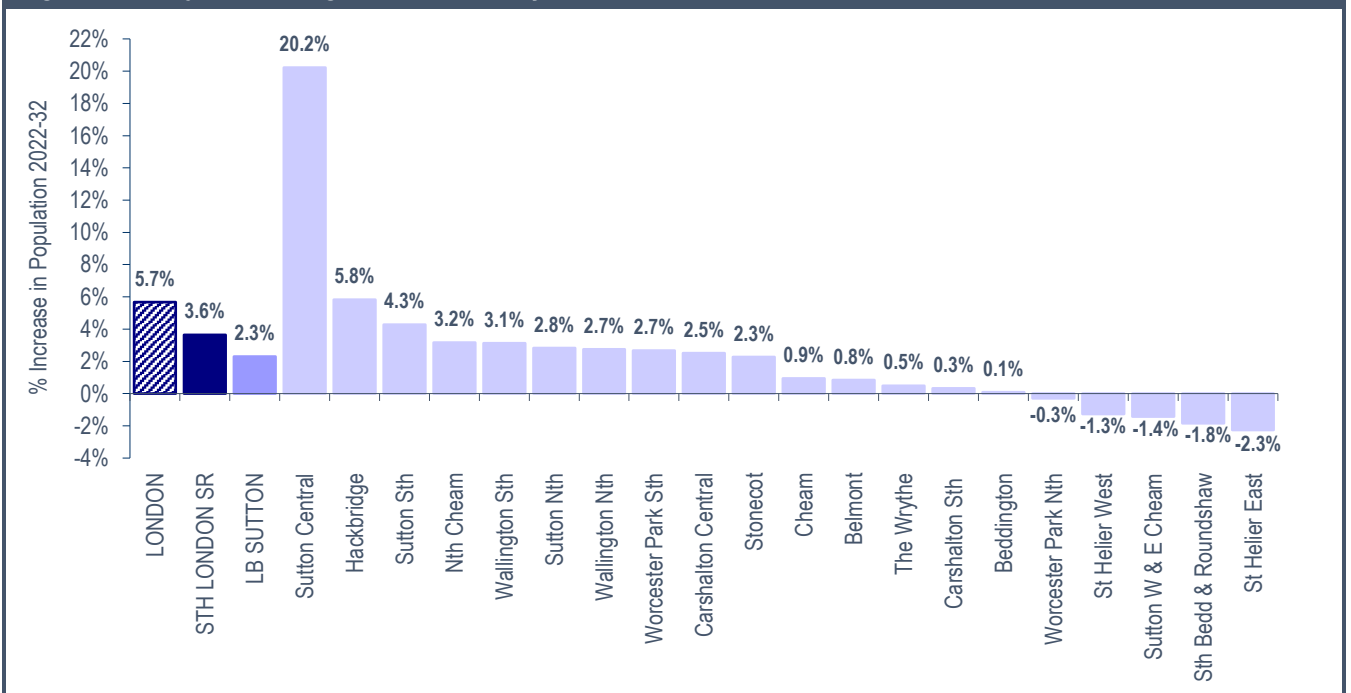
⁴² ONS 2018-based sub-national population projections are available at <https://www.ons.gov.uk/releases/subnationalpopulationprojectionsforengland2018based>

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

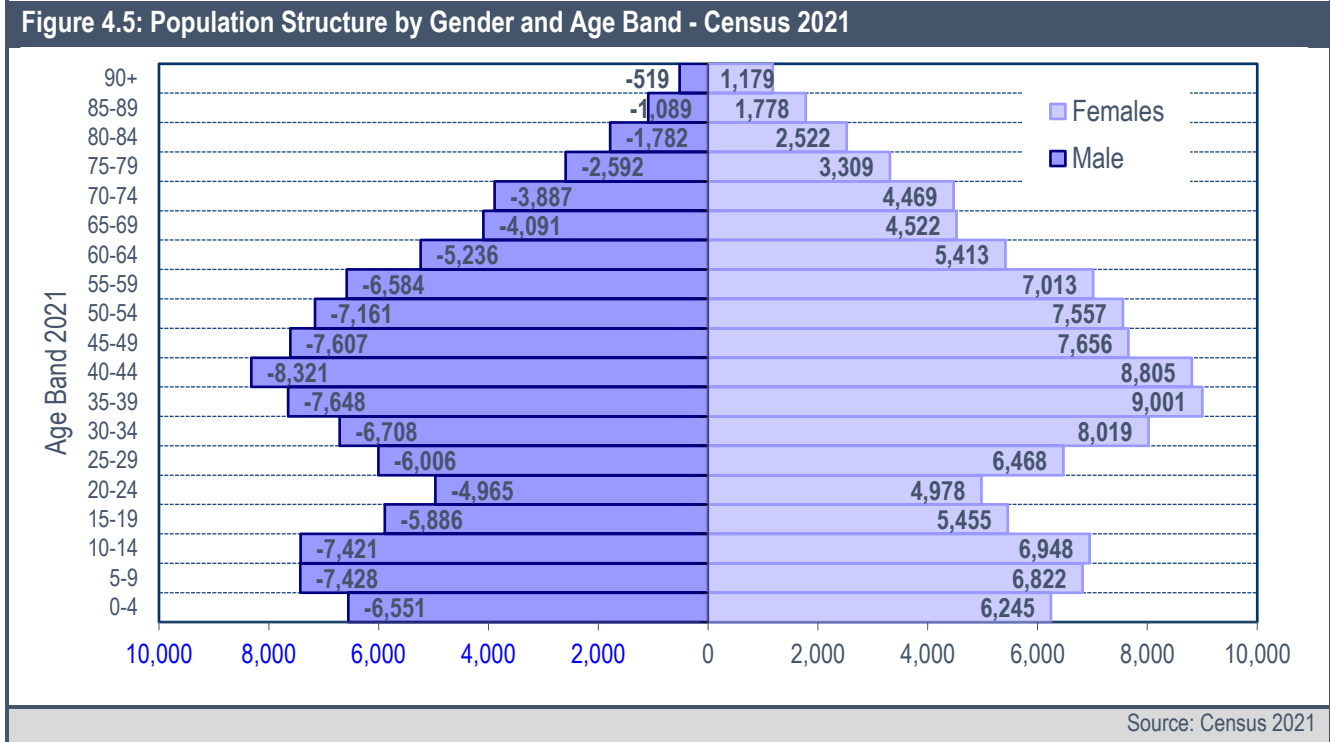


Ward Population Projections

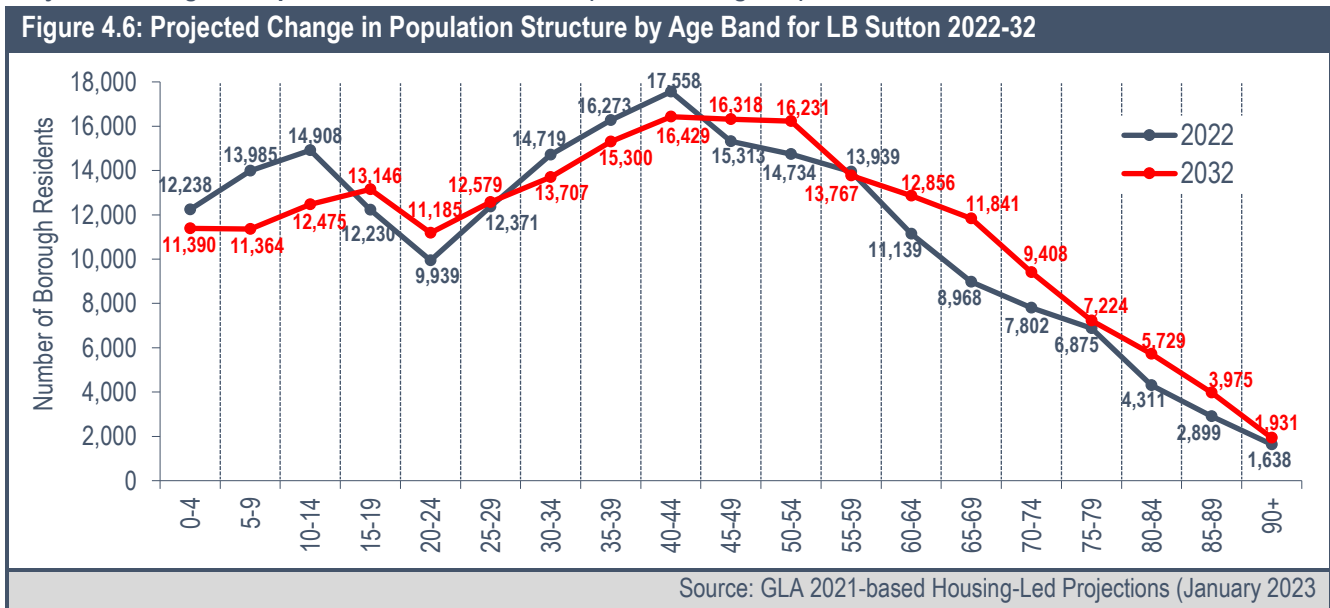
Figure 4.4: Projected Change in Population by Ward 2022-32



Population Structure – Census 2021



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



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

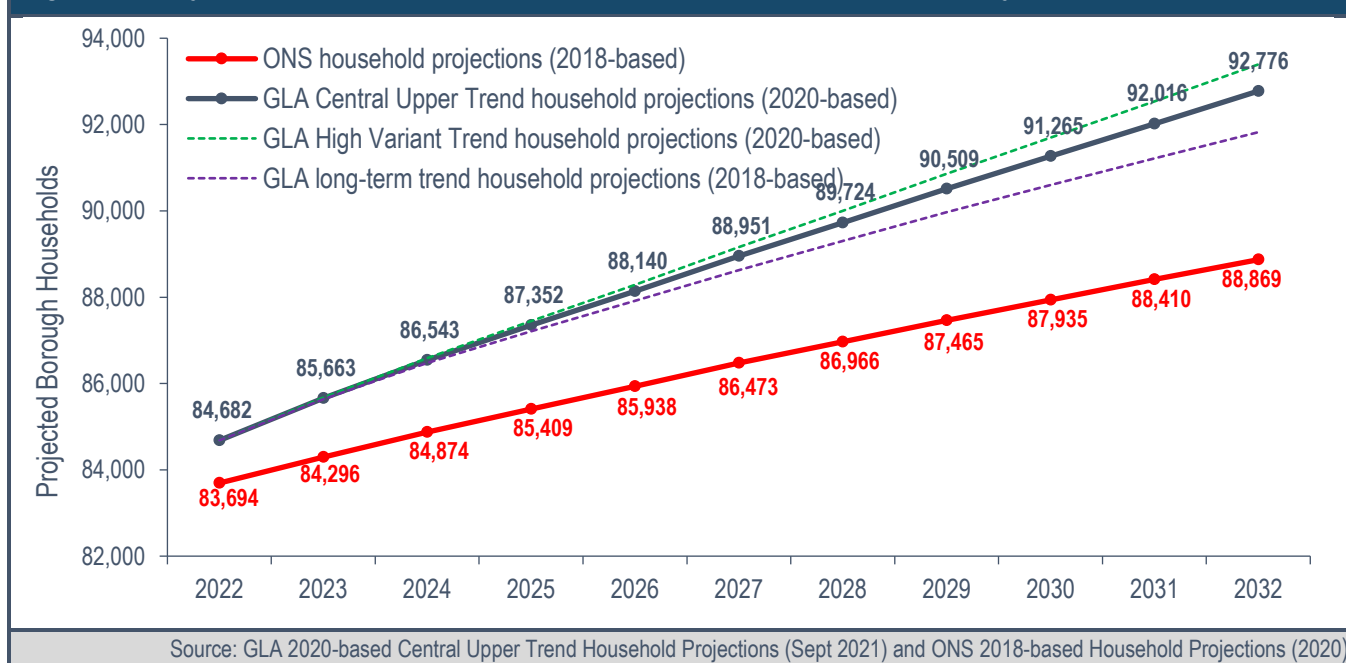
Indicator	Census 2011		Census 2021	
	Number	%	Number	Proportion (%)
Borough Residents: White	157,593	82.9%	143,145	68.3%
Black and Minority Ethnic (BAME)	32,507	17.1%	66,491	31.7%
Asian or Mixed Race (incl. Chinese)	17,299	9.1%	39,855	19.0%
Black or Mixed Race	10,646	5.6%	16,510	7.9%
Other	5,893	3.1%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

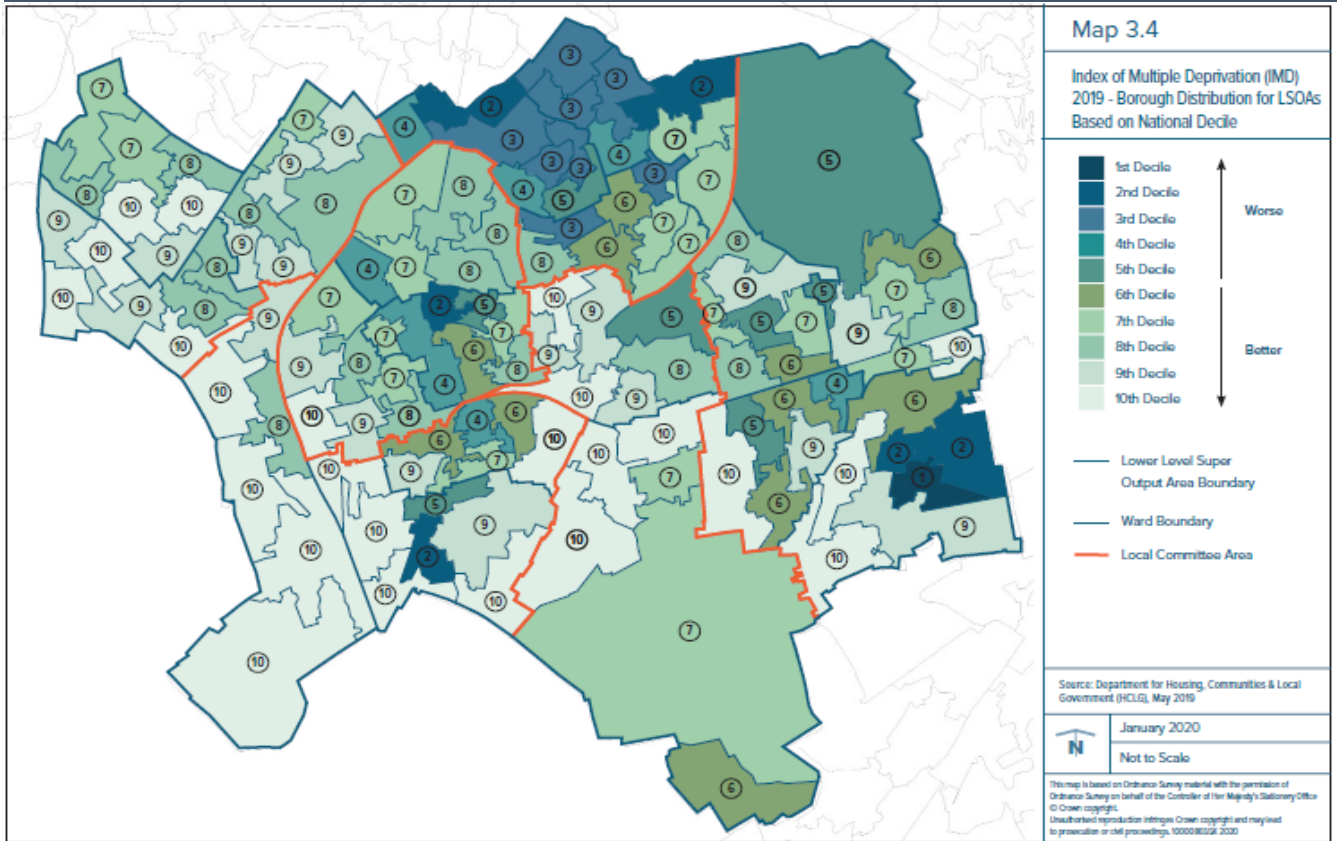
Deprivation Indicator	IMD 2010	IMD 2015	IMD 2019
BOROUGH RANKING COMPARED TO OTHER LAs IN ENGLAND AND LONDON			
LB Sutton ranking compared to the 317 local authority areas in England based on IMD 2019 'rank of average score' (1 st = most deprived and 317 th = least deprived)	196 th most deprived in England	215 th most deprived in England	226 th ↓ most deprived in England
LB Sutton ranking compared to the 33 London Boroughs	5 th least deprived	5 th least deprived	3 rd ↓ 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>

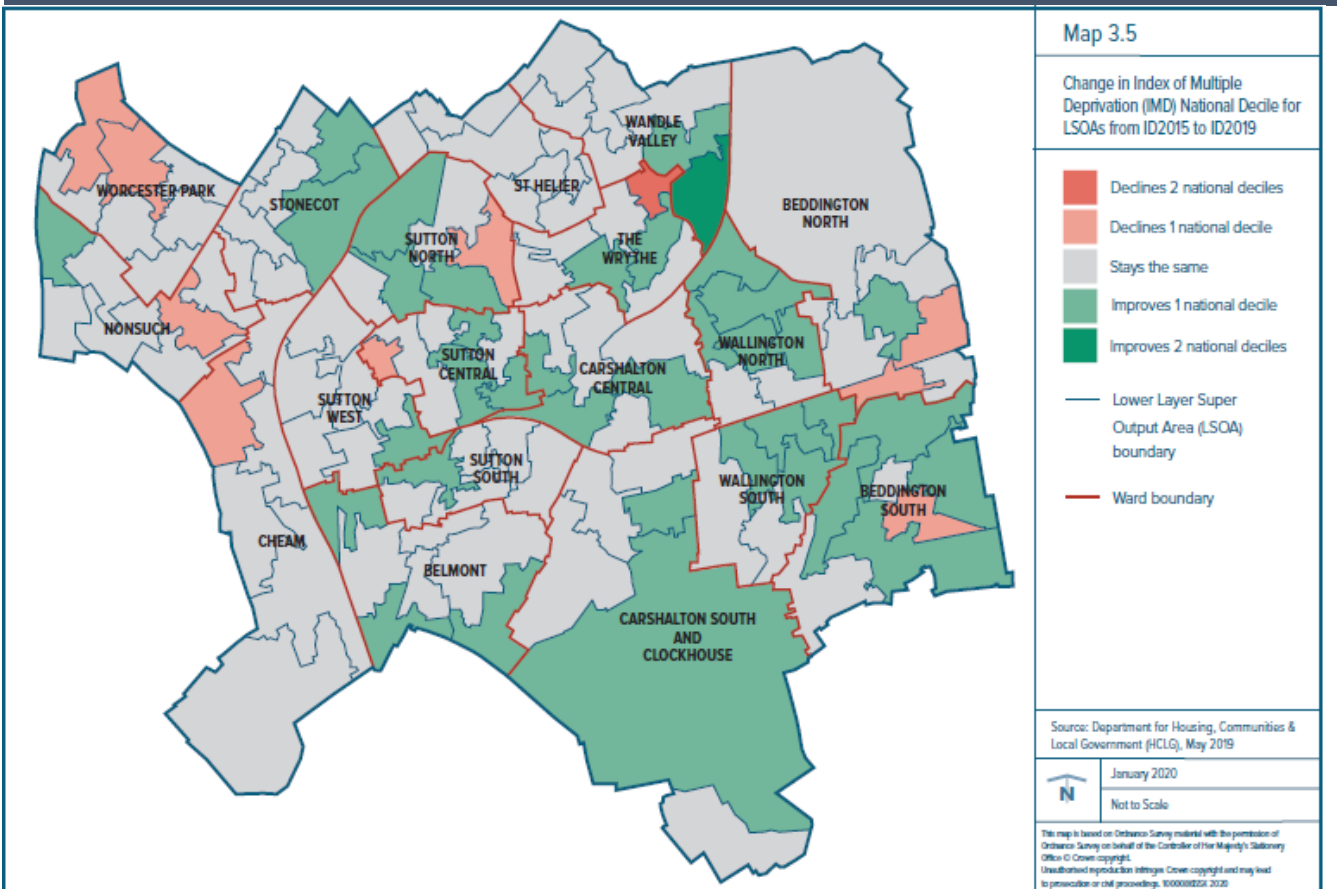
⁵² the Index of Multiple Deprivation (IMD), prepared by the Department for Housing, Communities and Local Government (HCLG), is the Government's official measure of relative deprivation for small areas and neighbourhoods in England

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

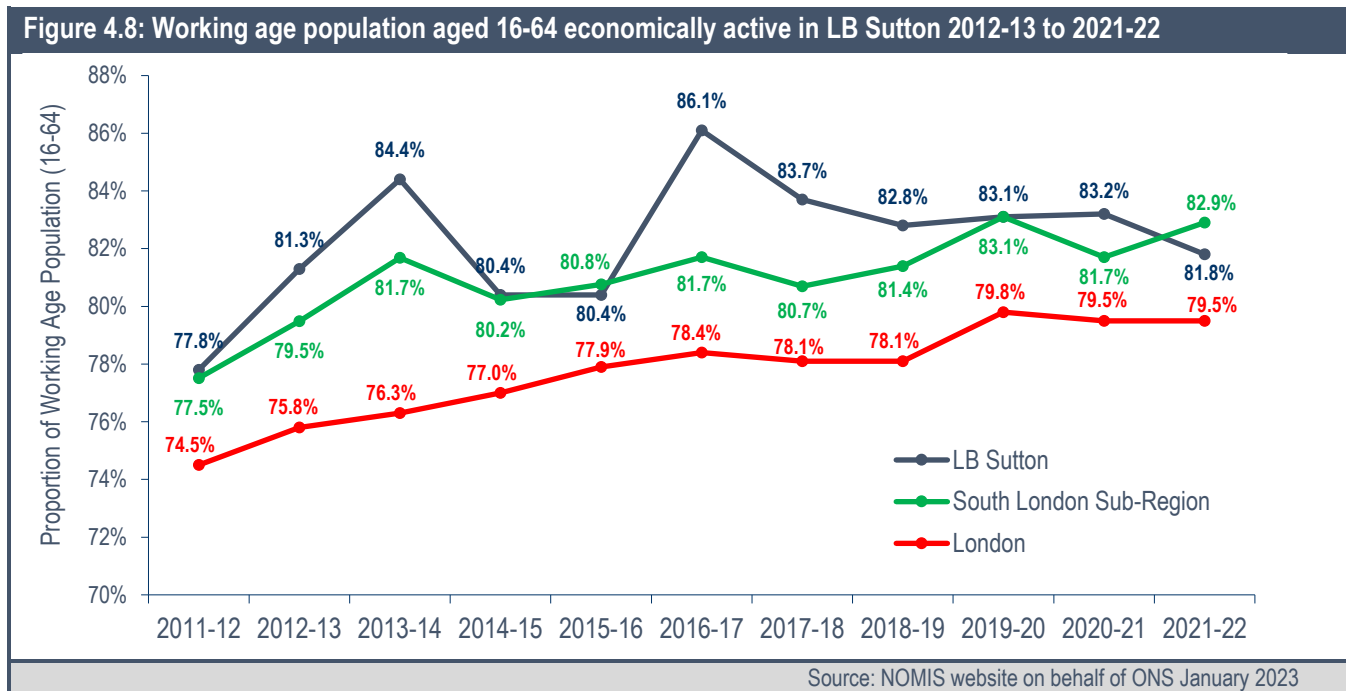
Map 4.2: Index of Multiple Deprivation – Borough Distribution based on IMD 2019 Ranked Scores for LSOAs



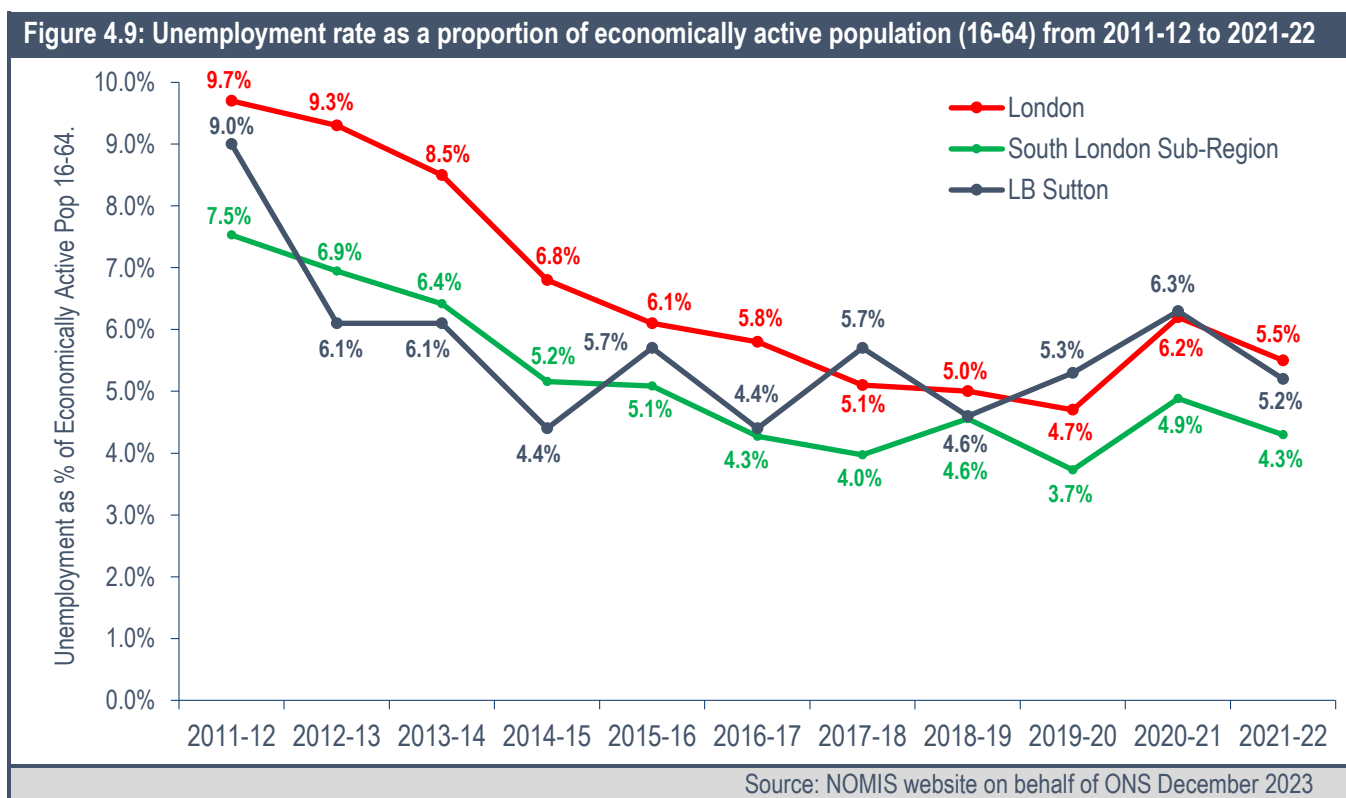
Map 4.3 Index of Multiple Deprivation – Change in IMD national decile for LSOAs between 2015 and 2019



Economic Activity – Borough Residents



Unemployment Rate and Out-of-Work Benefit Claimants

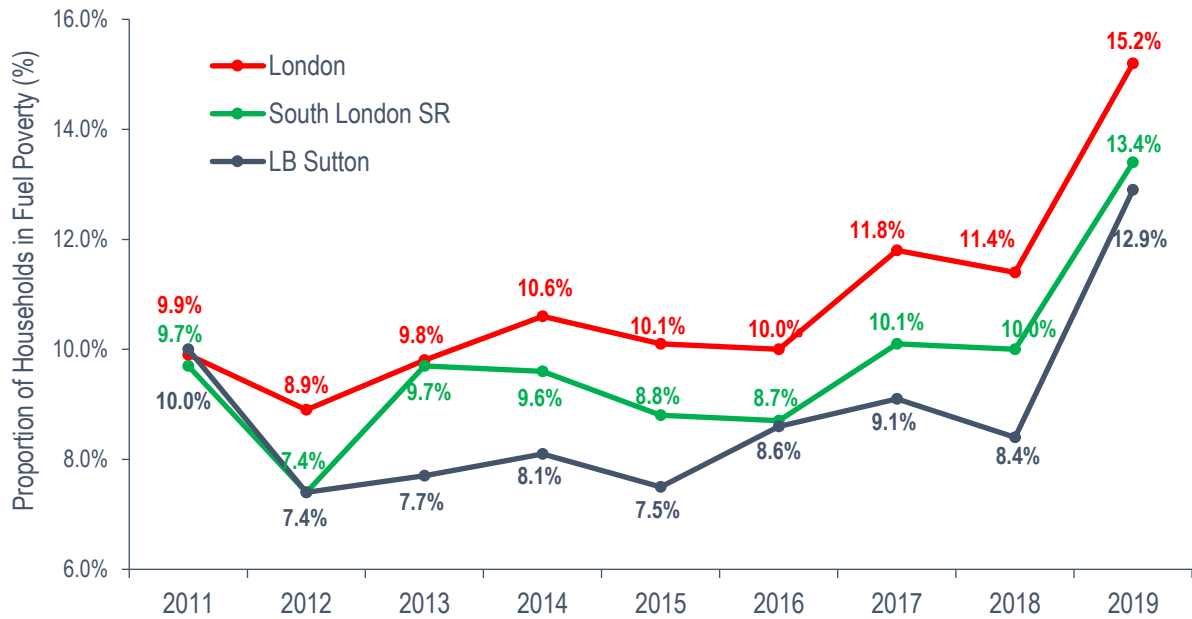


Fuel poverty - Government data to 2019

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

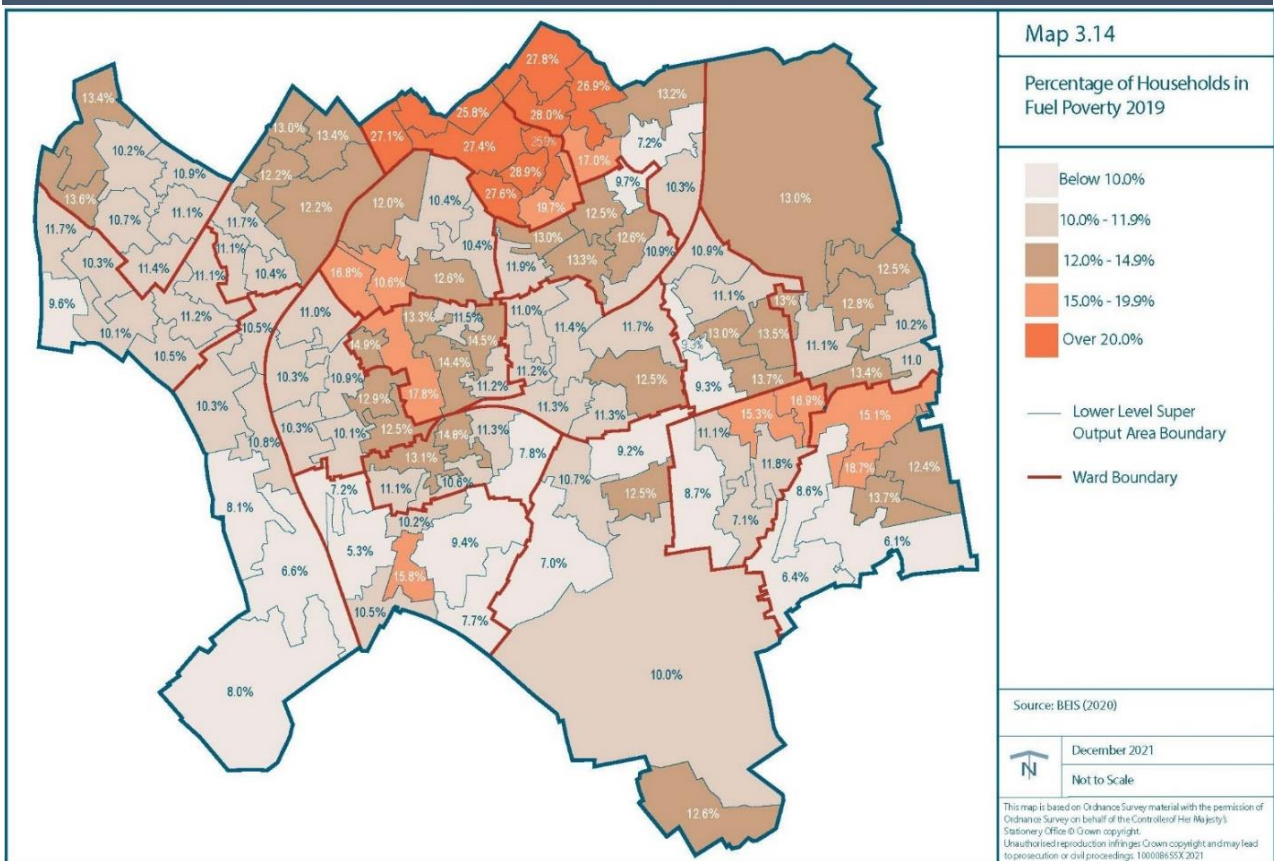
Source: Sub-regional fuel poverty data for 2018, Department for Business, Energy & Industrial Strategy (BEIS) April 2021

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	✓

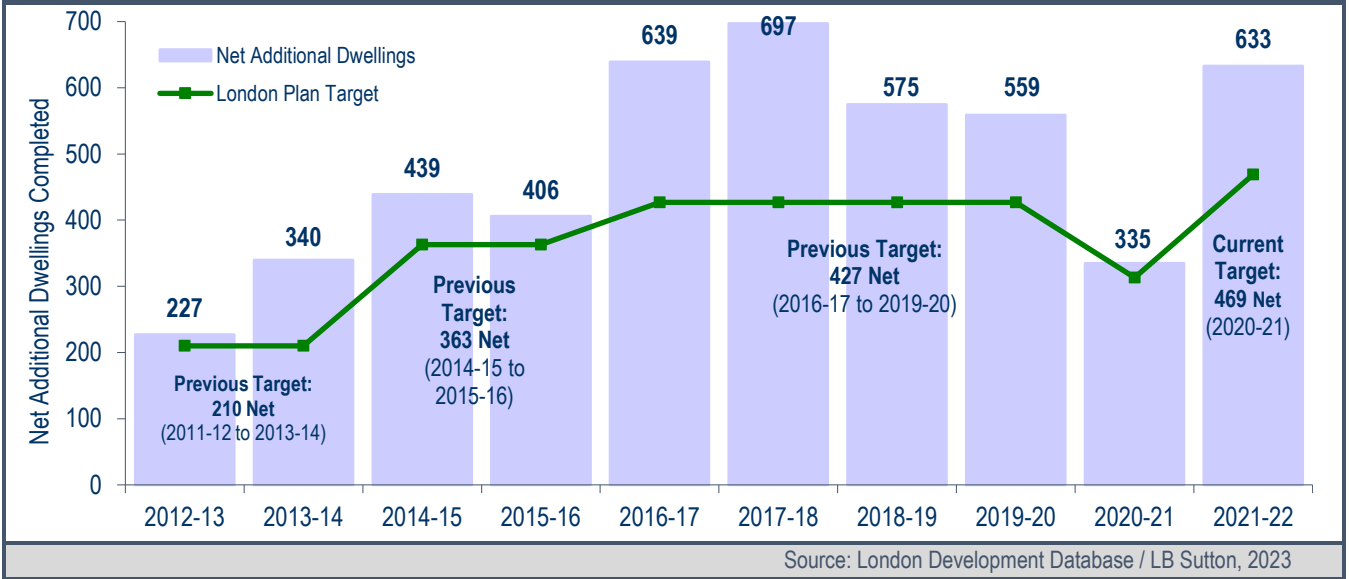
London Development Database / LB Sutton, 2023

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/>

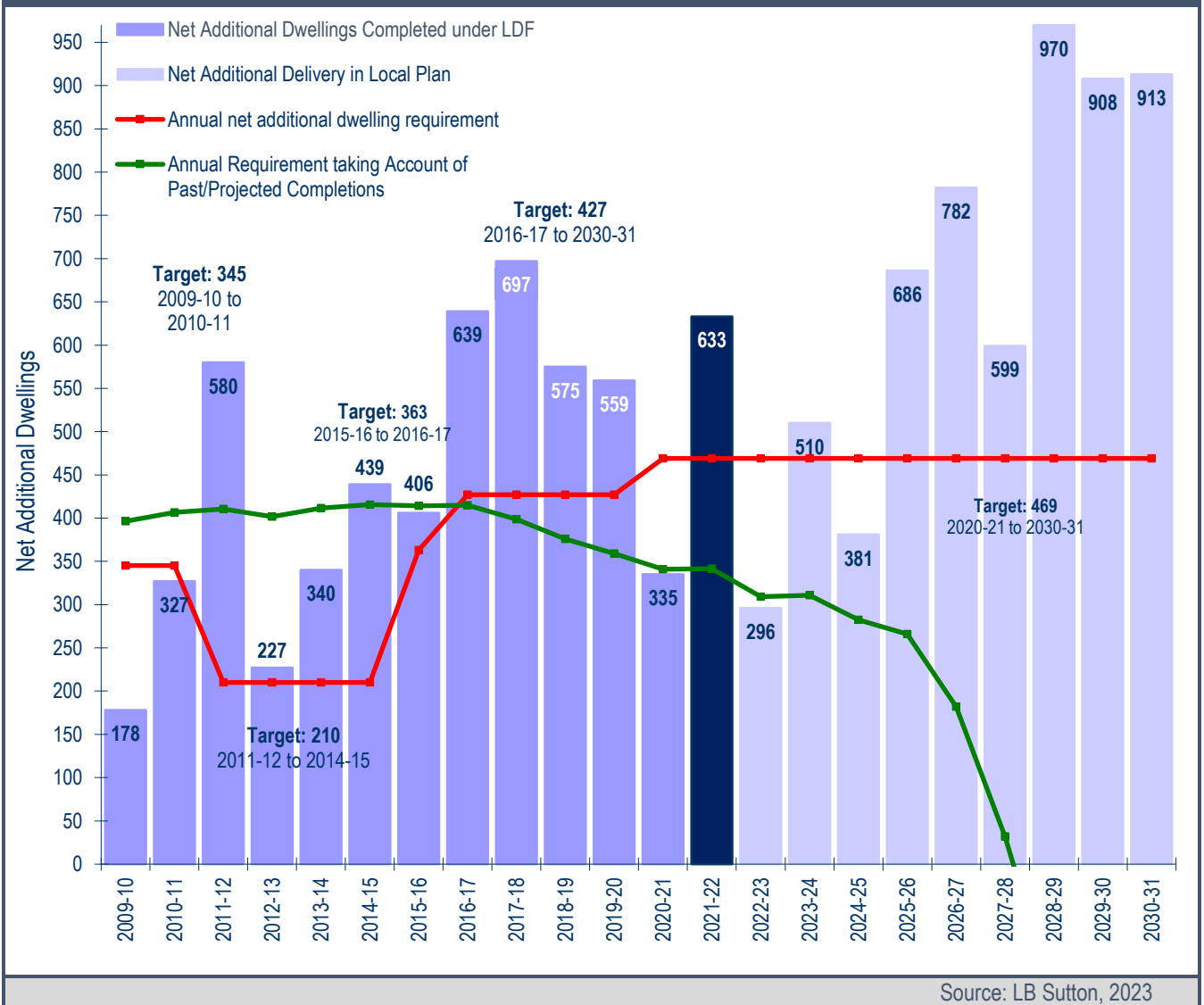
⁵⁶ an 'enterprise' is defined as the overall business, made up of all the individual sites or workplaces (local units). It is defined as the smallest combination of legal units (generally based on VAT and/or PAYE records) that has a certain degree of autonomy within an enterprise group

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)

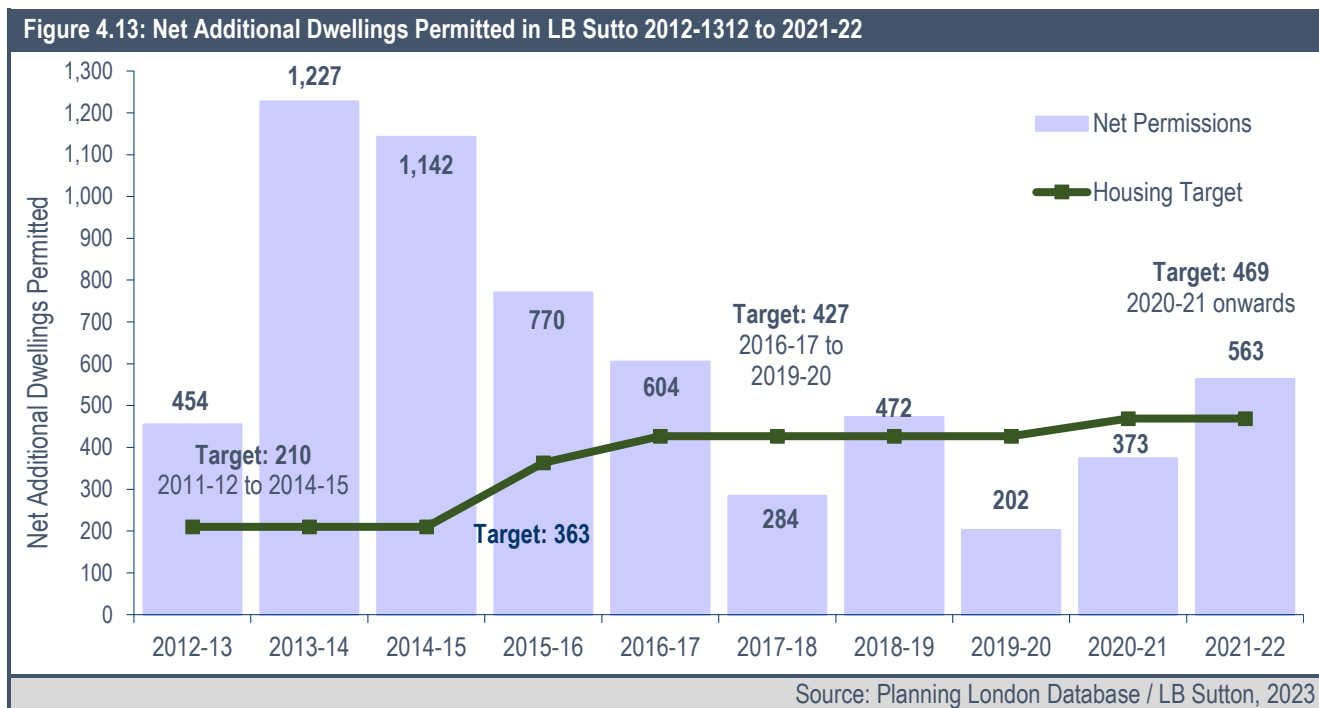
Affordable Housing Completions 2012-13 to 2021-22

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

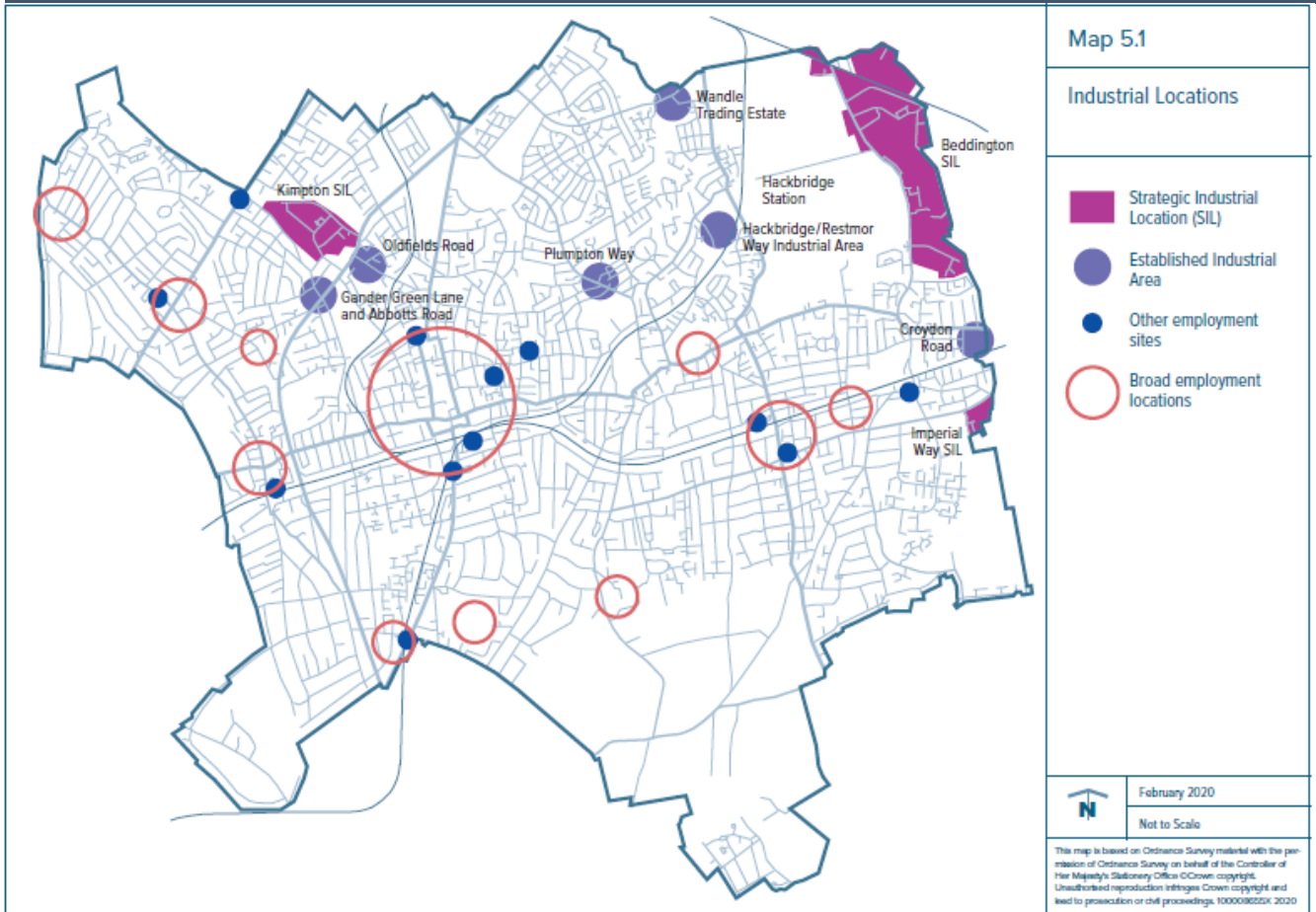
Source: Planning London Database / LB Sutton, 2023

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 & Abbotts 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

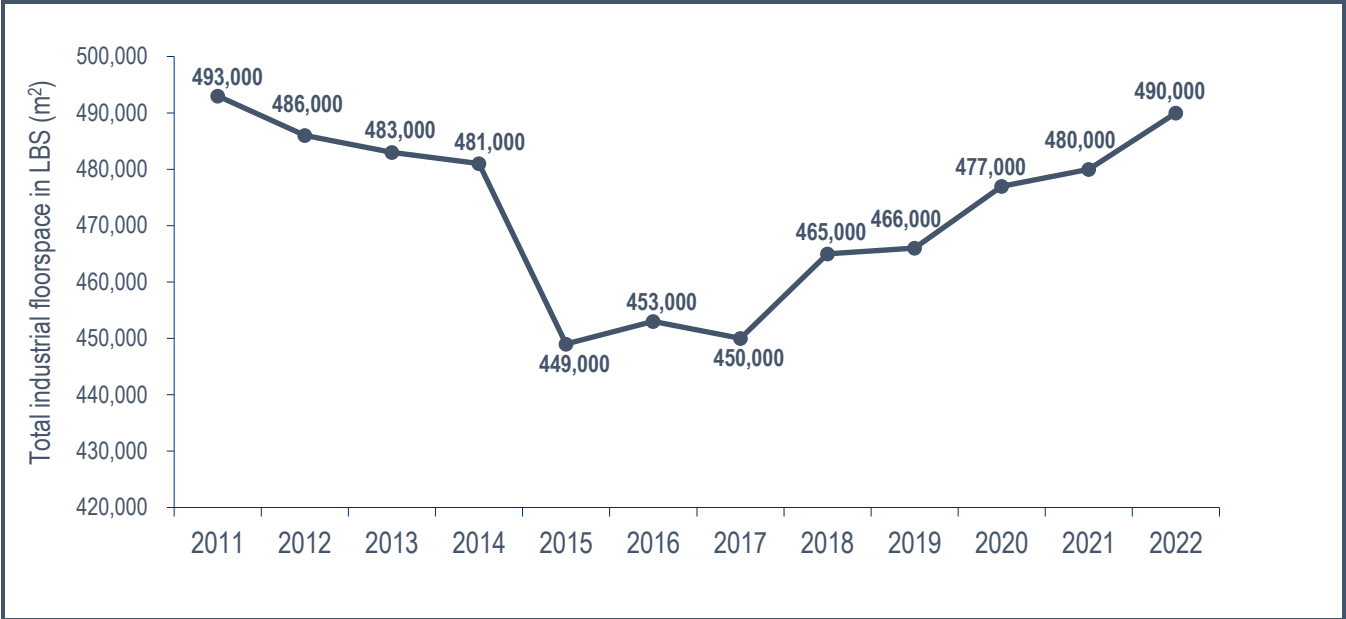


Total stock of industrial floorspace and vacancy rate

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

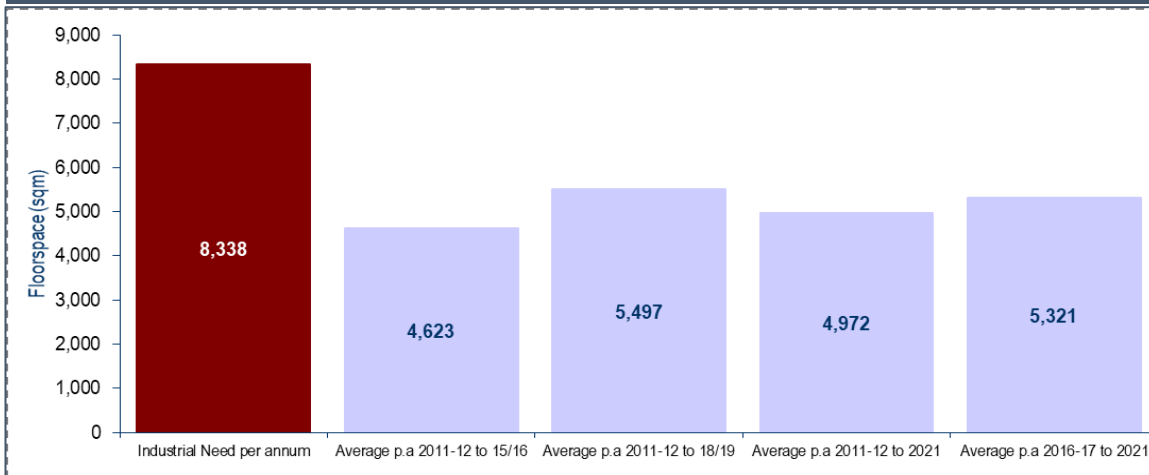
Annual take-up of industrial floorspace from 2018 to 2022					
Calendar Year	No. of transactions	Minimum size take up (m ²)	Maximum size take up (m ²)	Average unit size (m ²)	Total take-up (m ²)
2018	24	20	4,216	813	19,520
2019	14	45	1,969	448	6,278
2020	26	67	7,536	859	22,331
2021	16	140	4,297	774	12,391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

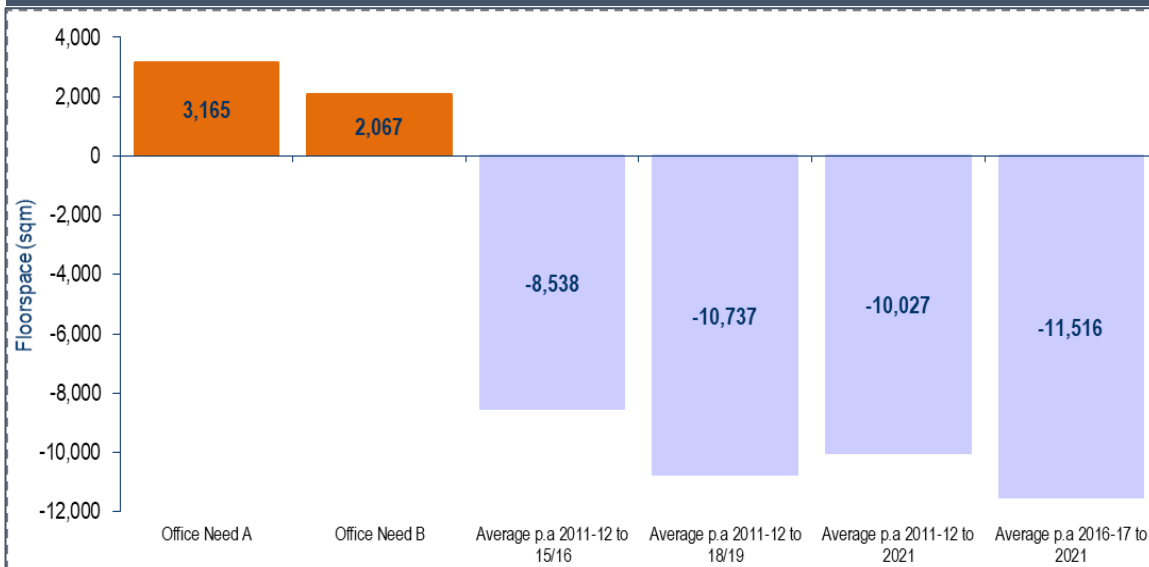


Source: Employment Land and Economic Needs Assessment (Stantec Ltd on behalf of LB Sutton, Feb 2023)

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).

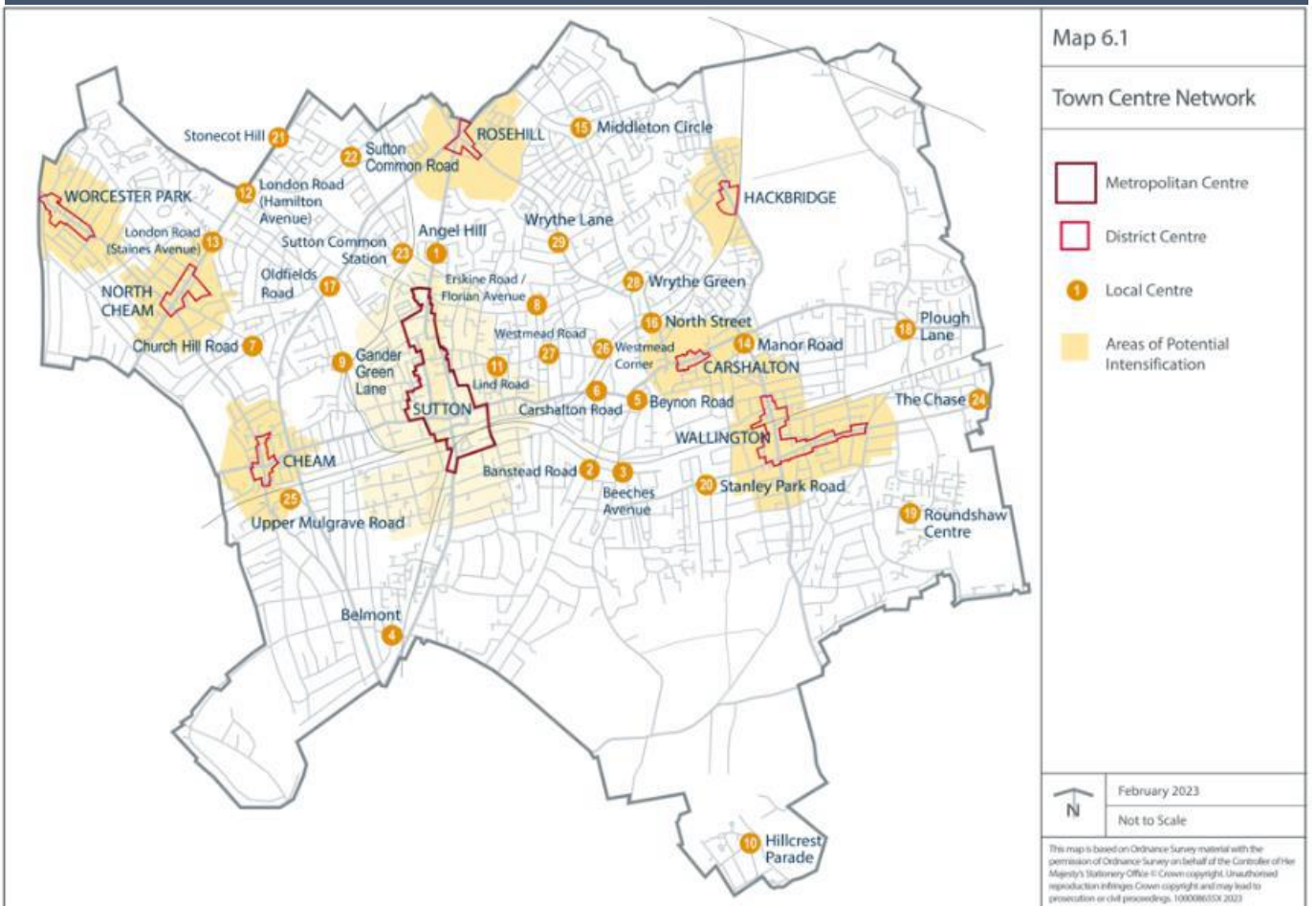
TOWN CENTRES

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.

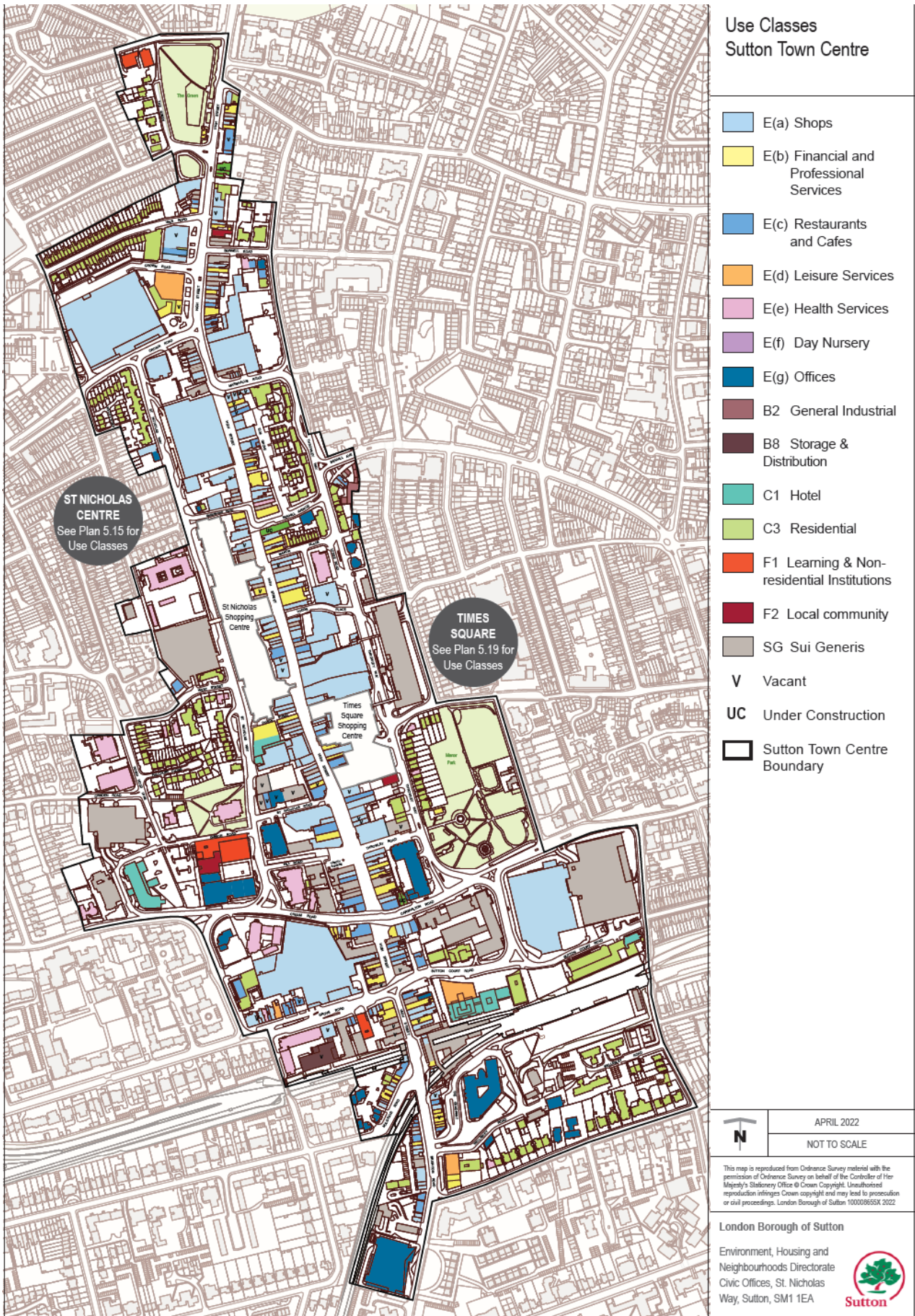
Use Class F1 – Learning and non-residential institutions

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

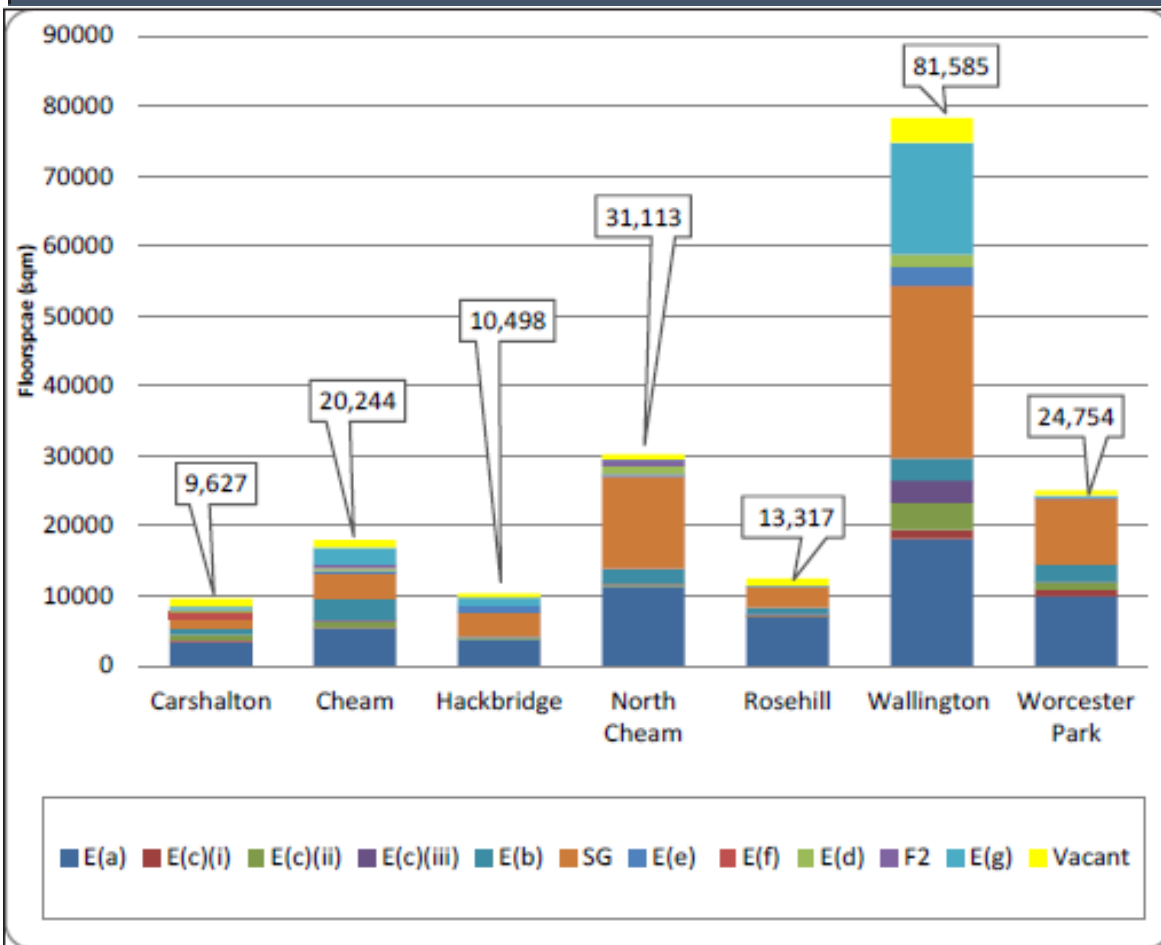
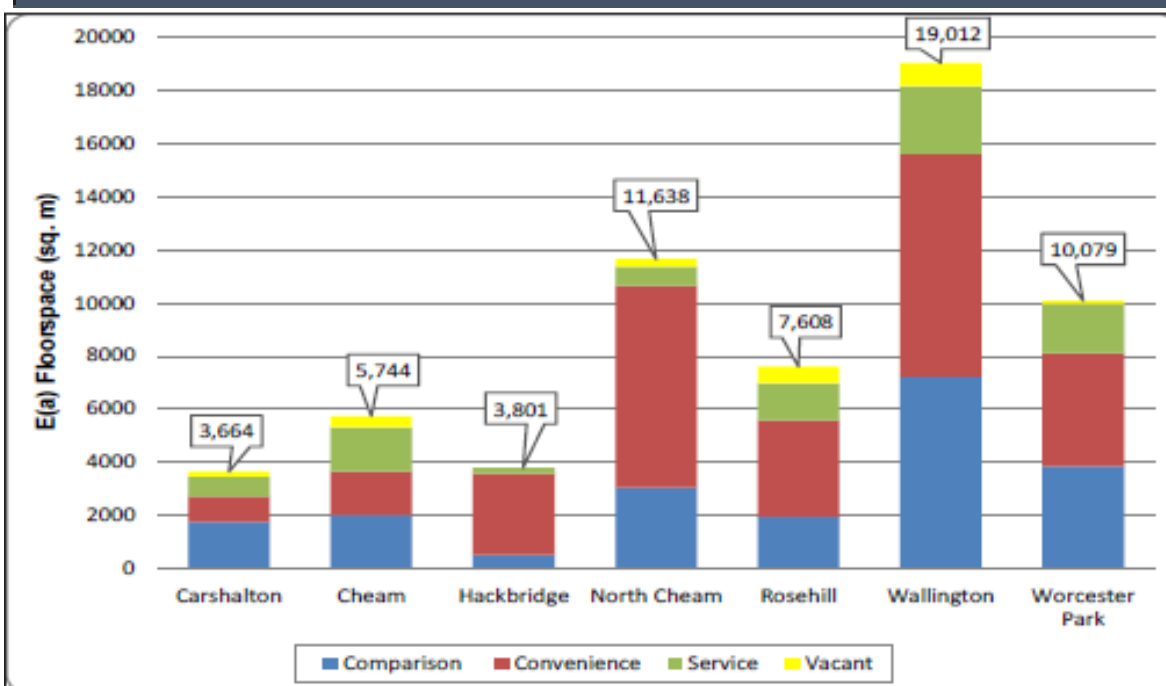


Figure 4.18: District Centre Health Checks - – Retail Classification by amount of floorspace (m²)

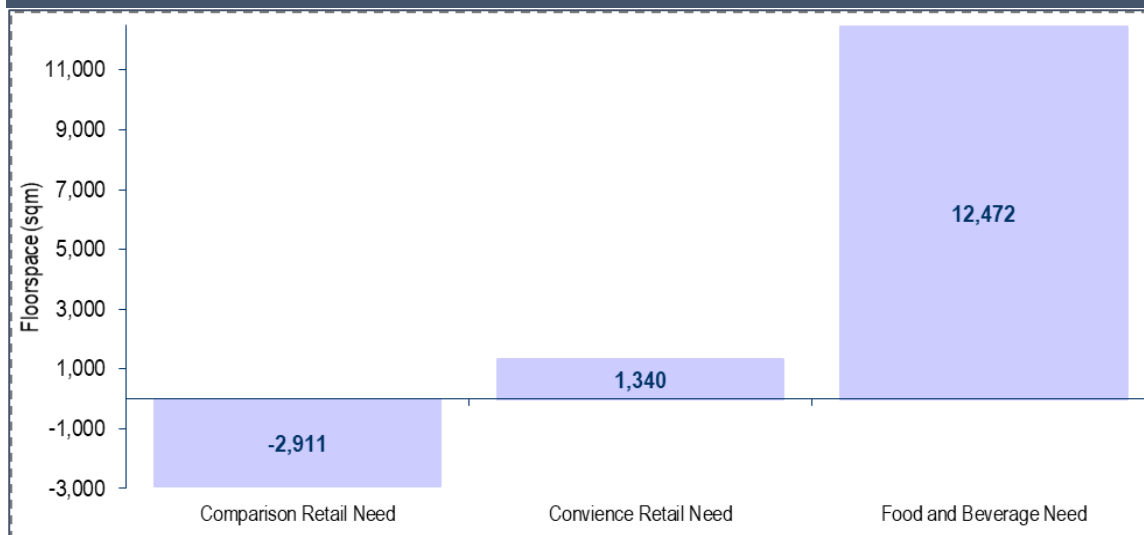


District Centres - Vacant Units and Floorspace

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.

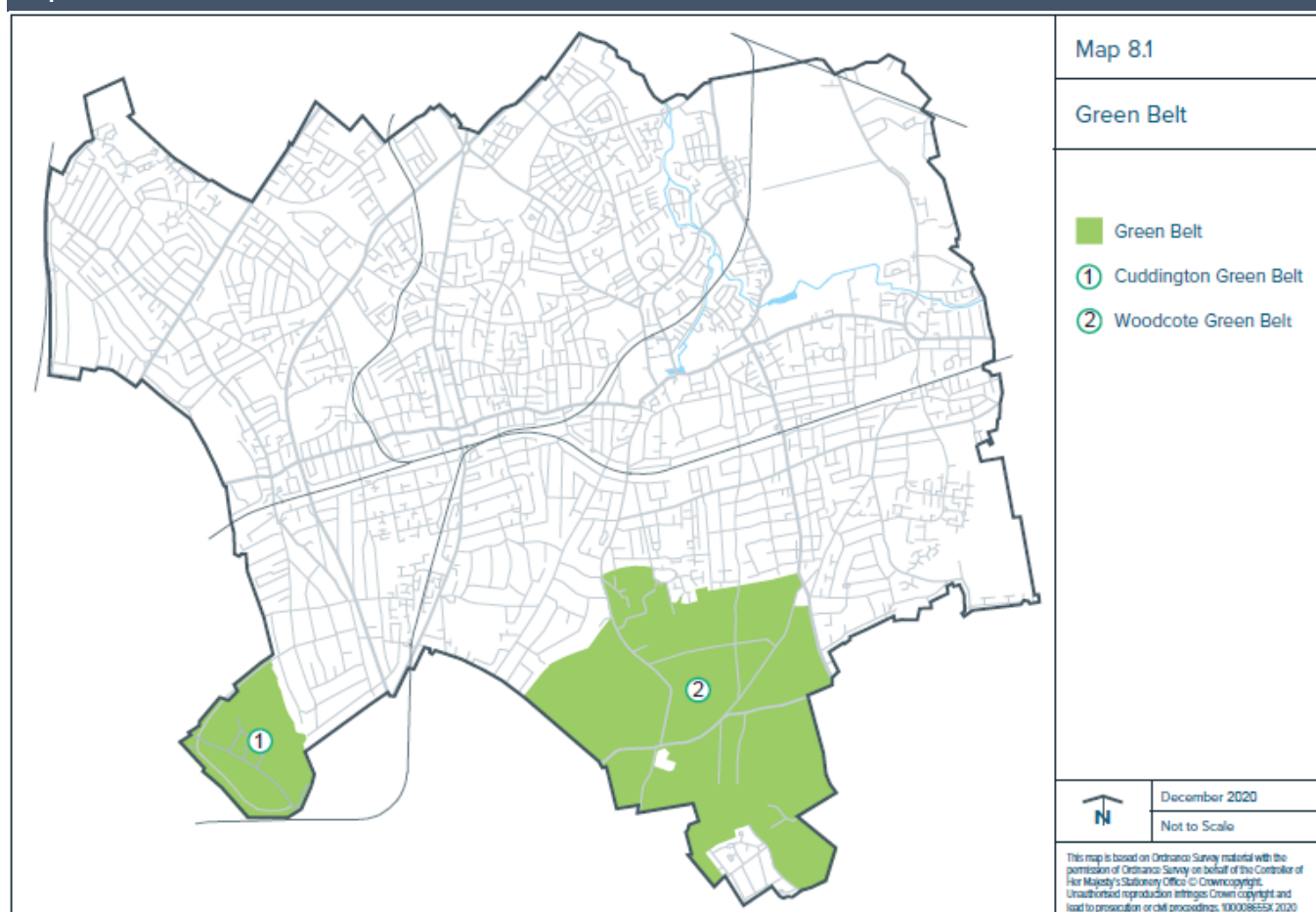
OPEN SPACE

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

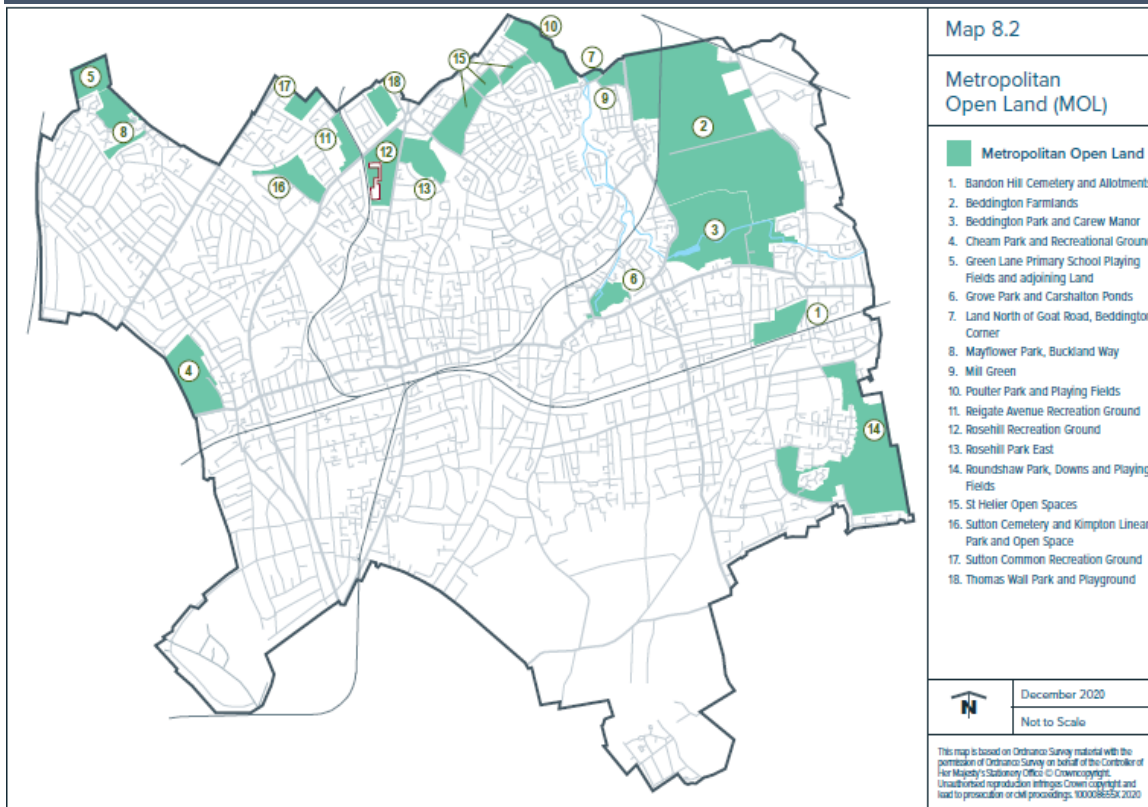


Metropolitan Open Land (MOL)

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)

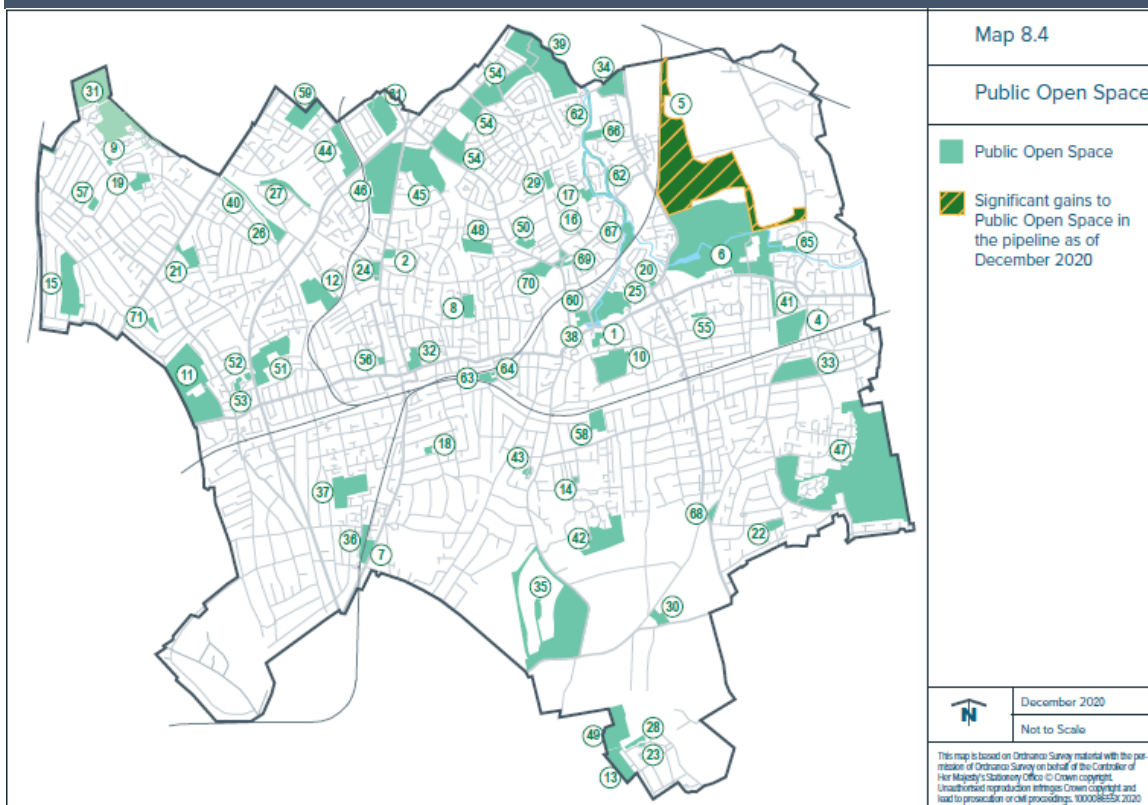
Map 4.9: Metropolitan Open Land (MOL)



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	B11	8.64
11	Greenshaw Wood and Rosehill Park East	B12	6.25
12	Beddington Park	B13	56.35
13	Sutton Ecology Centre	B14	2.21
14	Ruffett, Blg Wood and Adjacent Meadow	B15	9.31
15	Carshalton Road Pastures and Grove Lane Hedge	B16	7.28
16	The Oaks Park and Golf Course	B17	95.86
17	Cuddington Open Spaces and Golf Course)	B18	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 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) (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

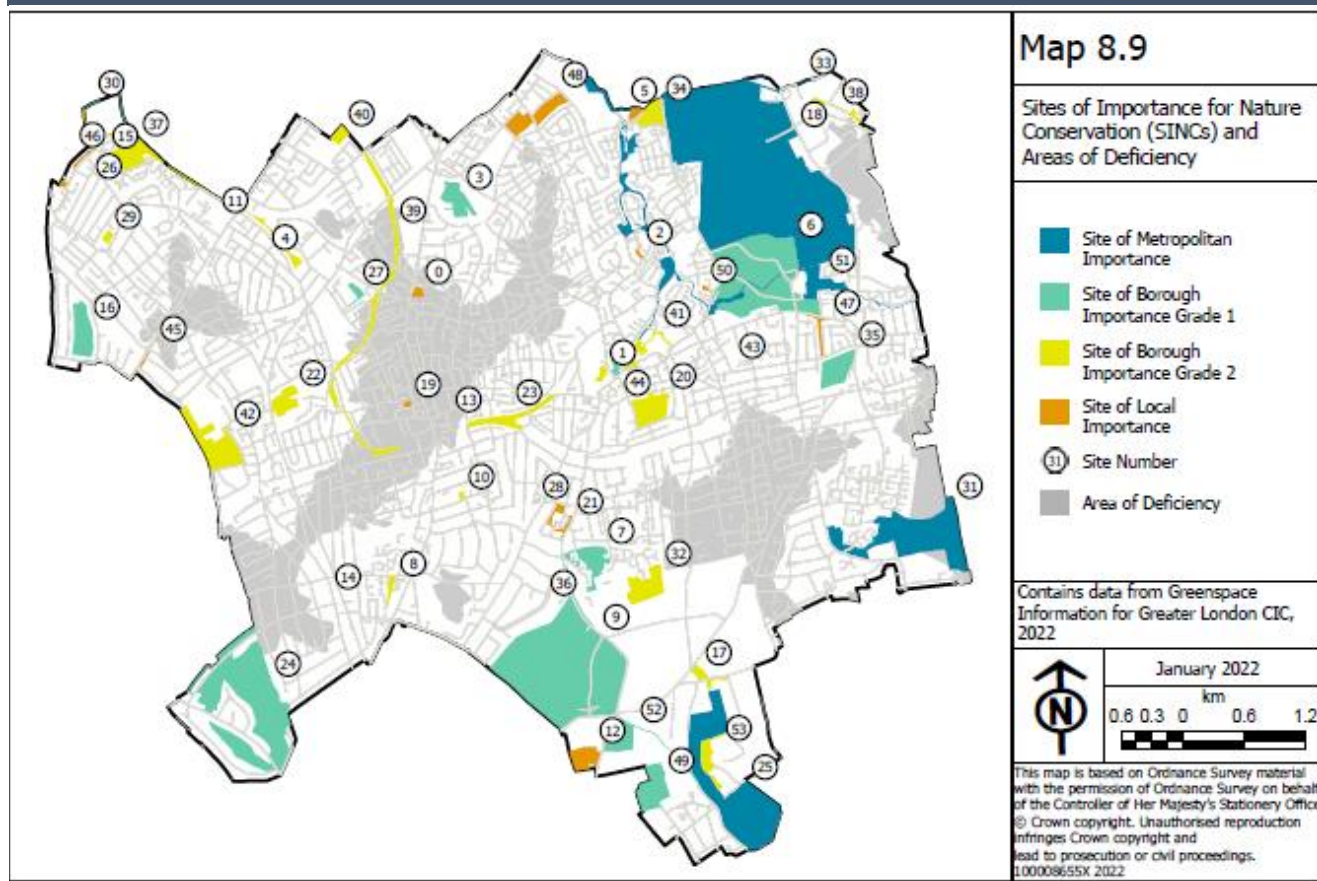
Source: Sutton Local Plan Appendix 2018 (Schedule 6.B) and Green Space Information for Greater London

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



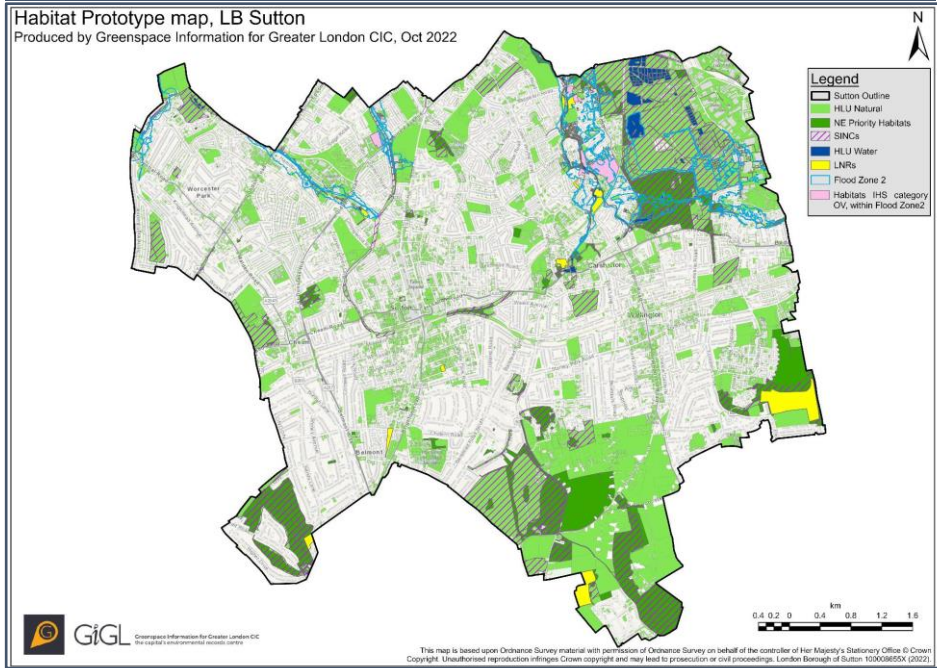
Borough Habitats

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) 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

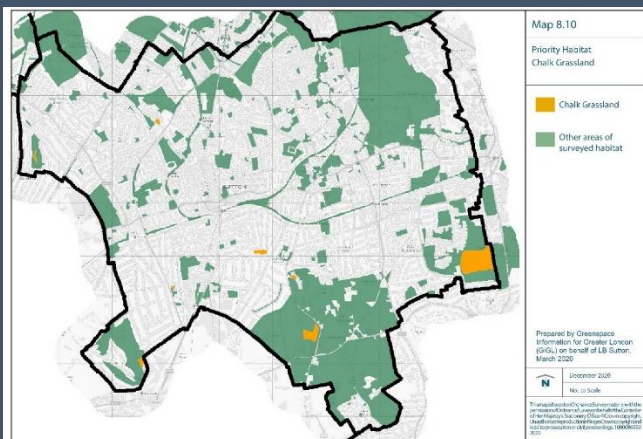
Source Green Space Information for Greater London on behalf of LB Sutton October 2023

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

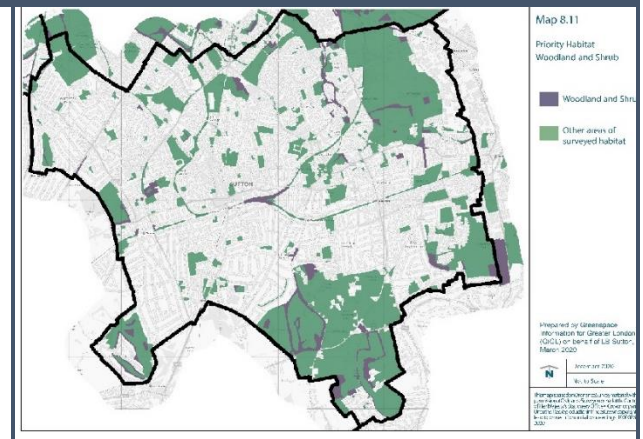


Source Green Space Information for Greater London on behalf of LB Sutton October 2023

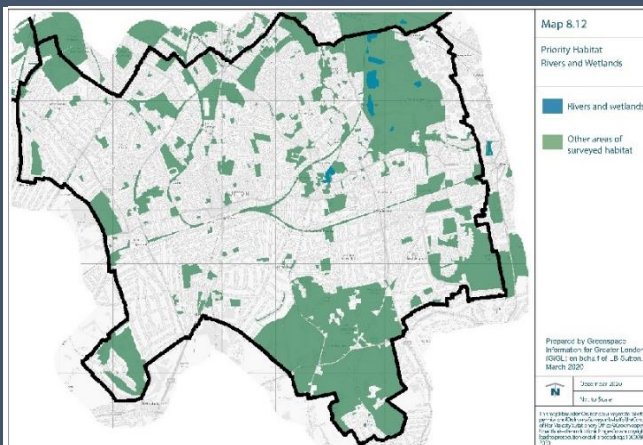
Map 4.13: Priority Habitat within LB Sutton – Chalk Grassland



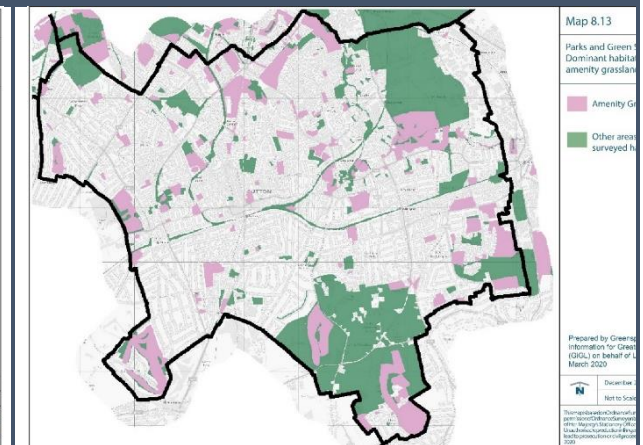
Map 4.14: Priority Habitat within LB Sutton – Woodland and Scrub



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)

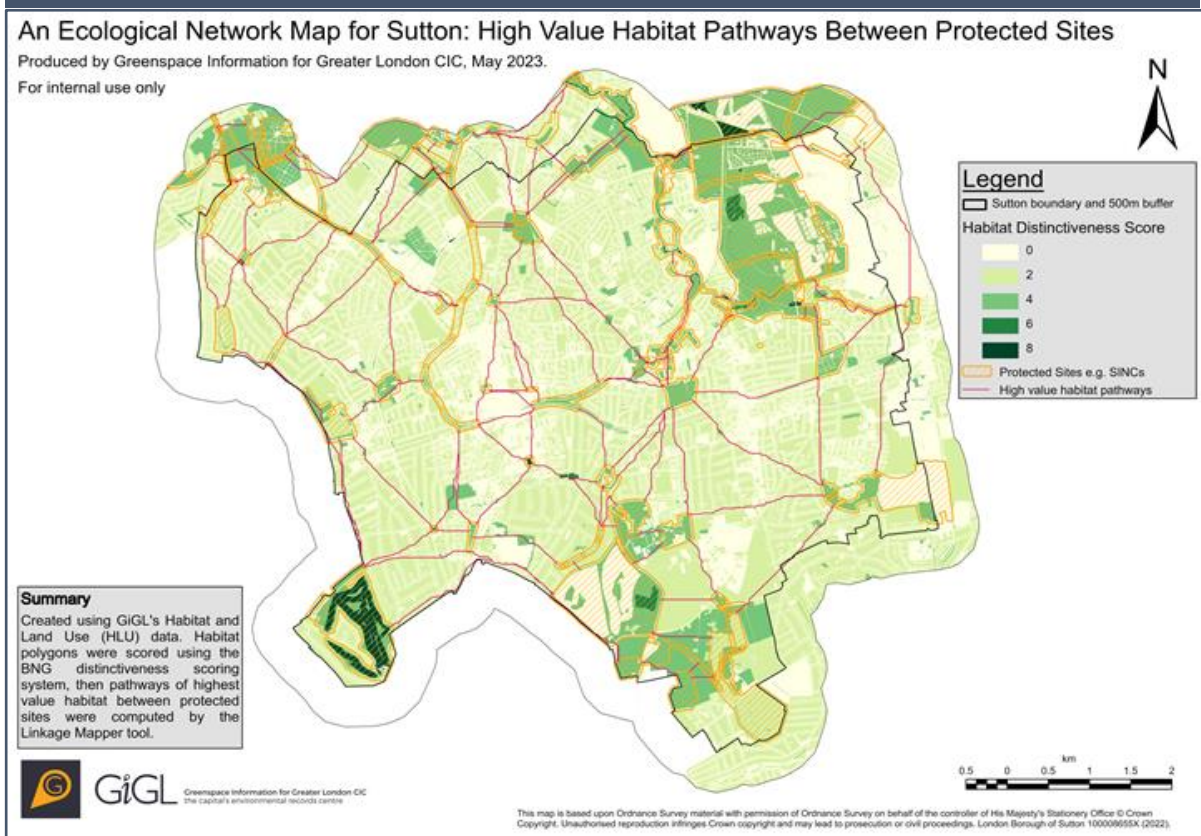


Monitoring of habitat enhancement measures in Local Plan and Biodiversity Action Plan (BAP)

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) 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. However it is expected that this baseline information will change over time as new data becomes available.

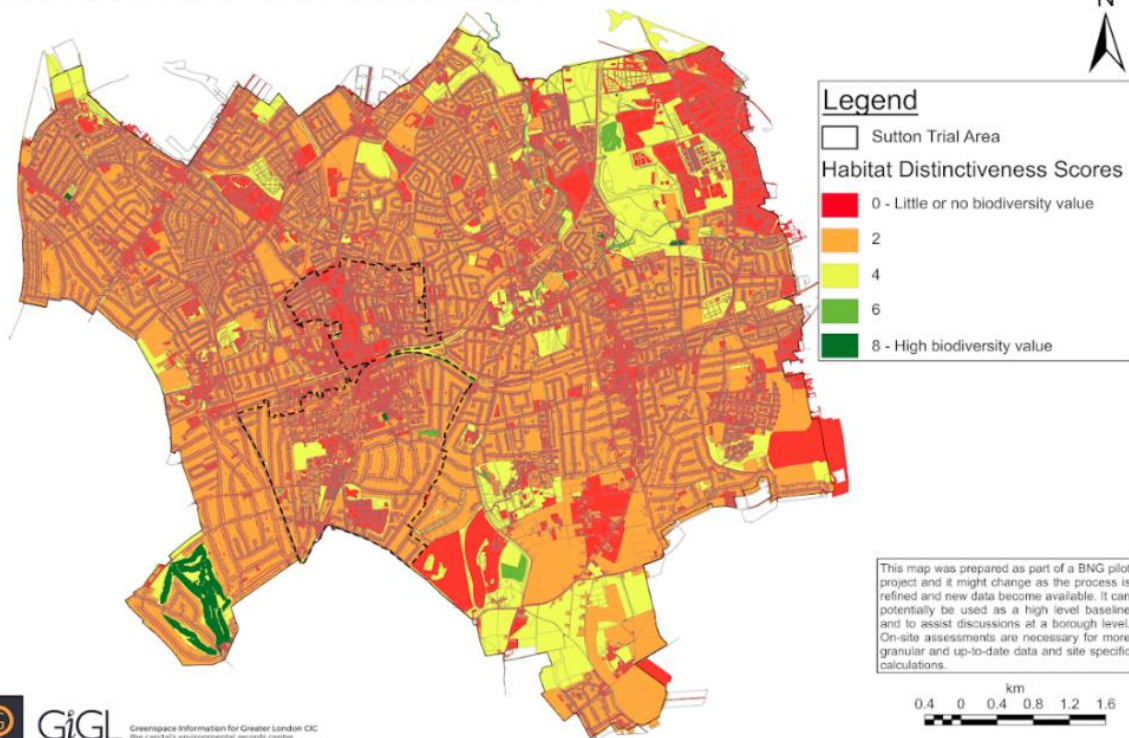
Biodiversity net gain (BNG) – Mapping habitat distinctiveness scores and biodiversity value

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

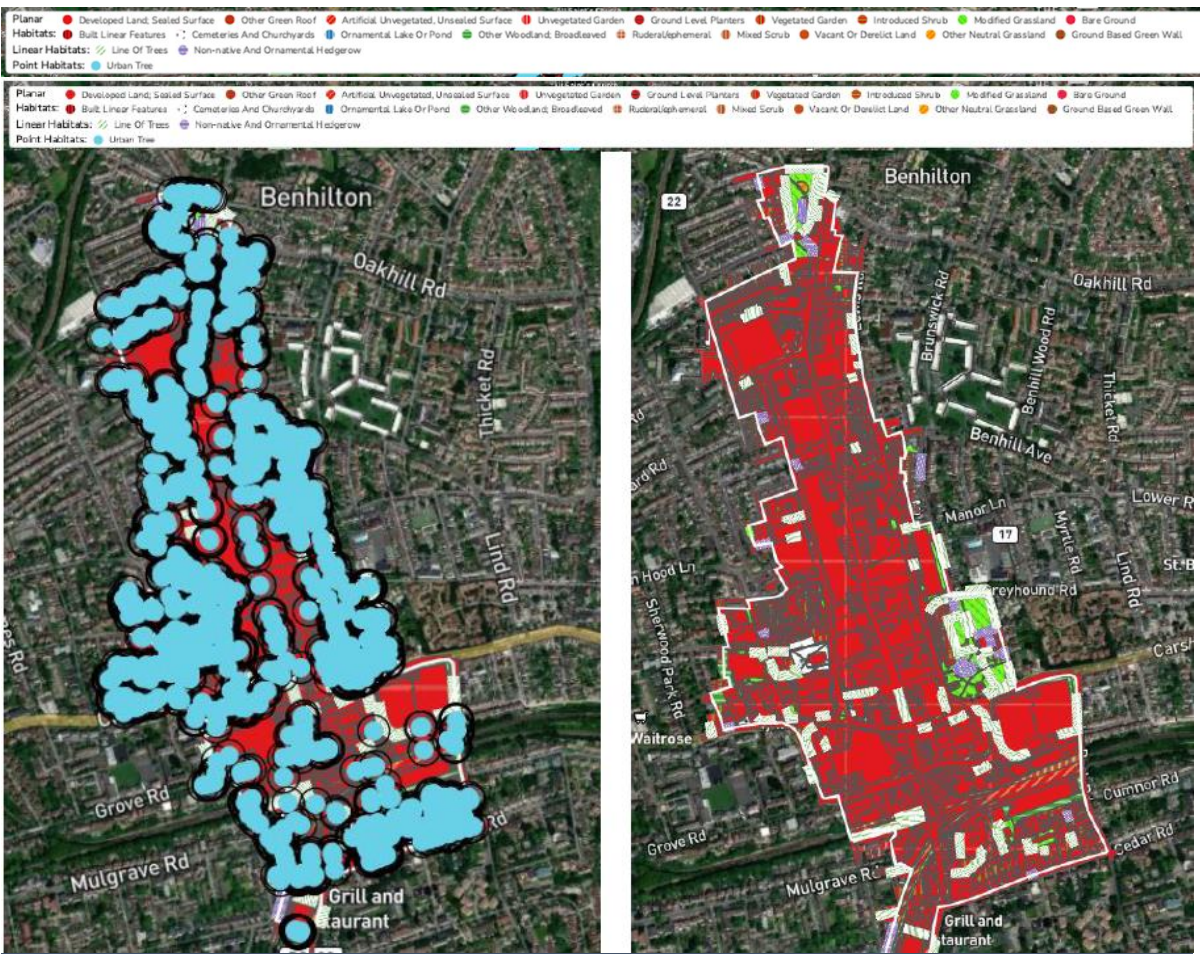


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Habitat Type	ha	%	Distinctiveness	Cond	Strategic Significance	Biodiversity Units
Arable and horticulture	45.4	1.0%	2	2	1	181.15
Broadleaf mixed and yew woodland	160.9	3.6%	4	2	1	1,286.27
Built linear features	564.0	0%	0	2	1	0.00
Built-up areas and 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) 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)



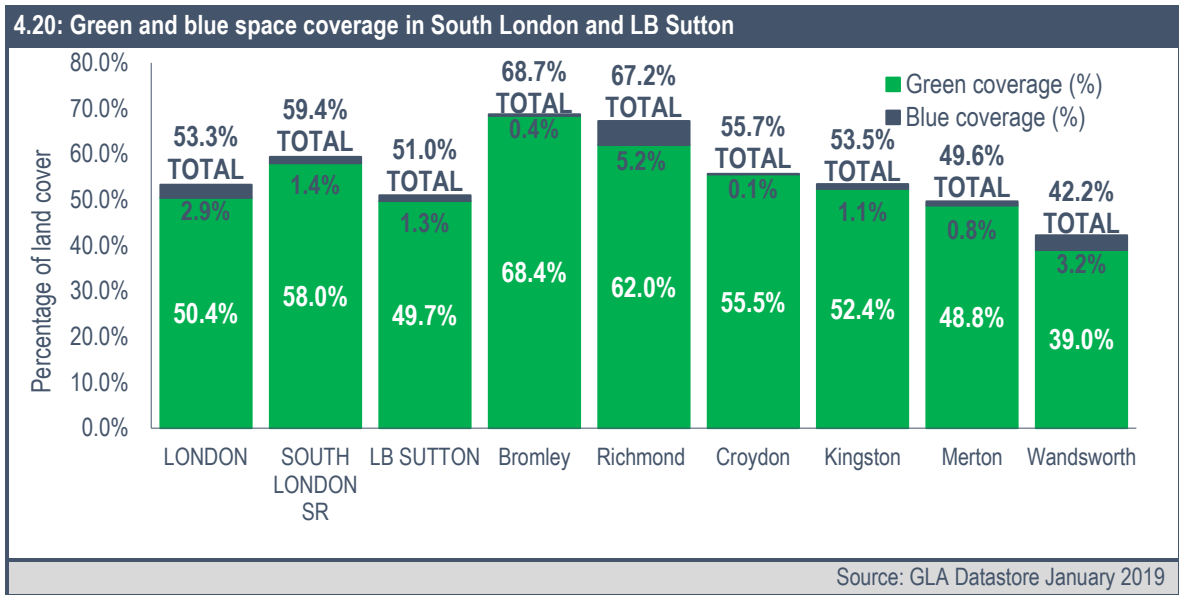
Source Ai-Dash Intelligent Sustainability Management System (ISMS), April 2024:

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%

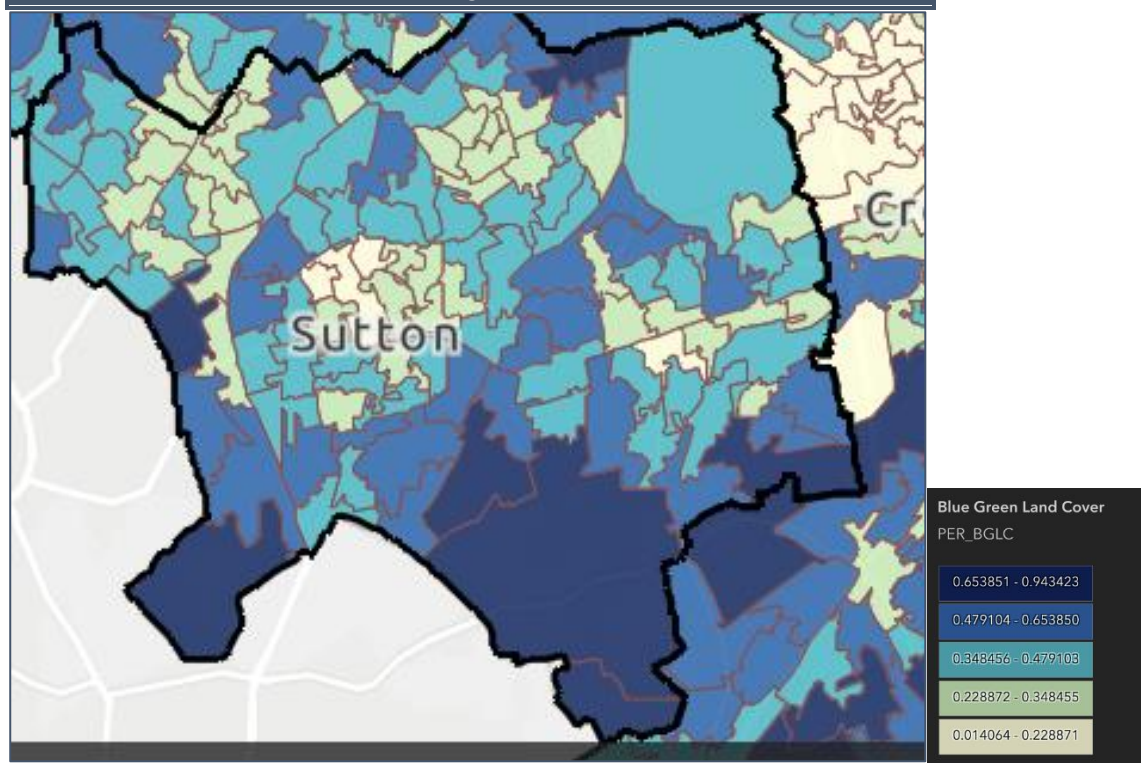
Source Ai-Dash Intelligent Sustainability Management System (ISMS), April 2024:

GREEN INFRASTRUCTURE AND CLIMATE VULNERABILITY MAPPING⁶¹

Green and blue space coverage



Map 4.20: Green and blue space coverage within LB Sutton



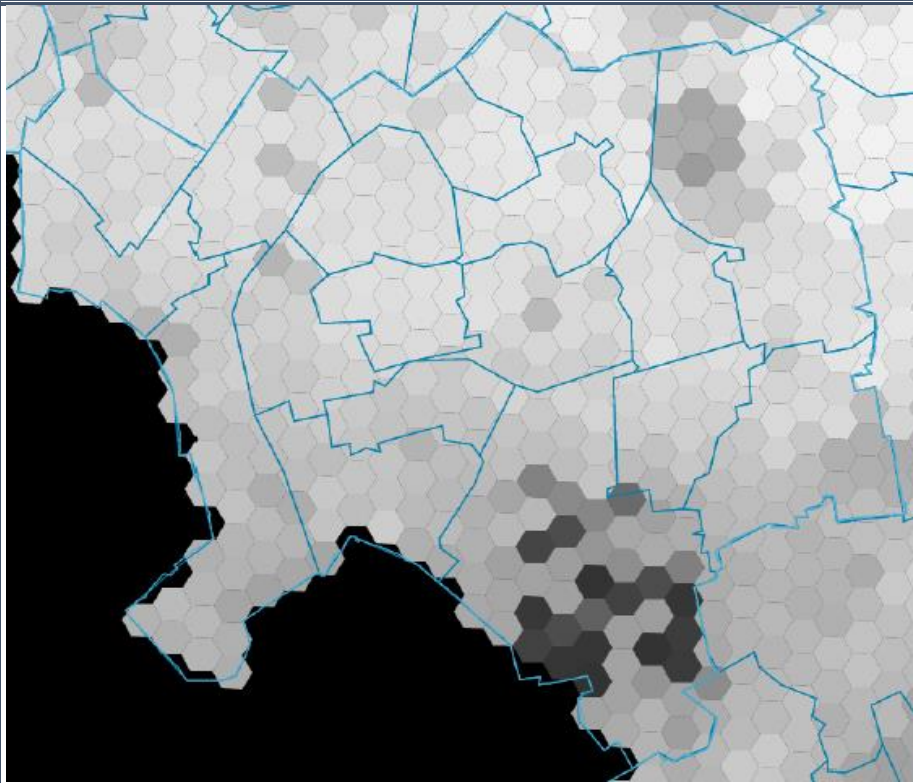
Source: GLA climate risk mapping 2022

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>

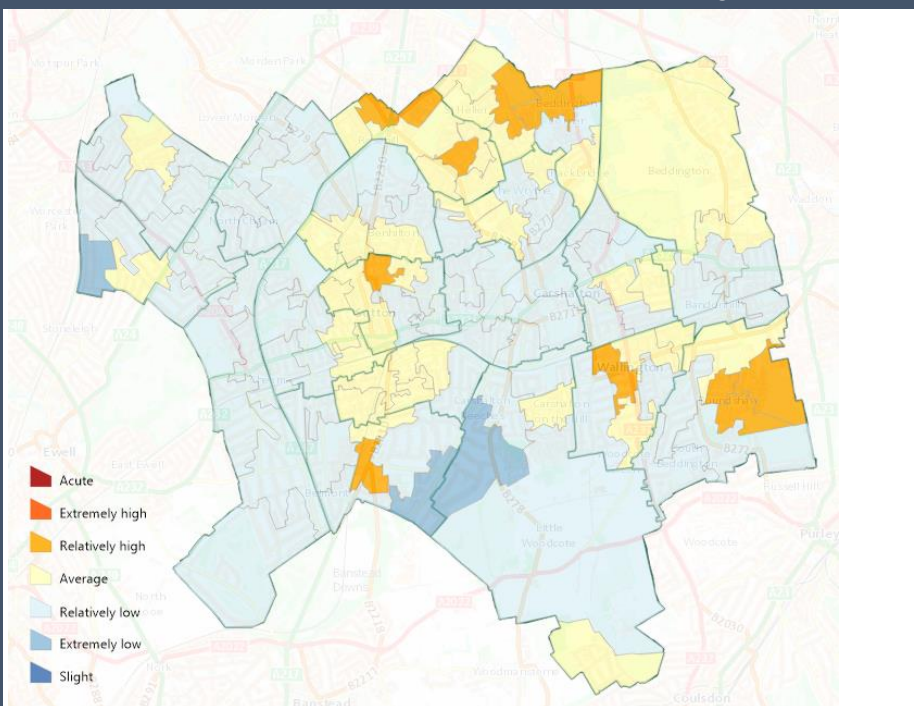
Climate exposure and vulnerability mapping

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



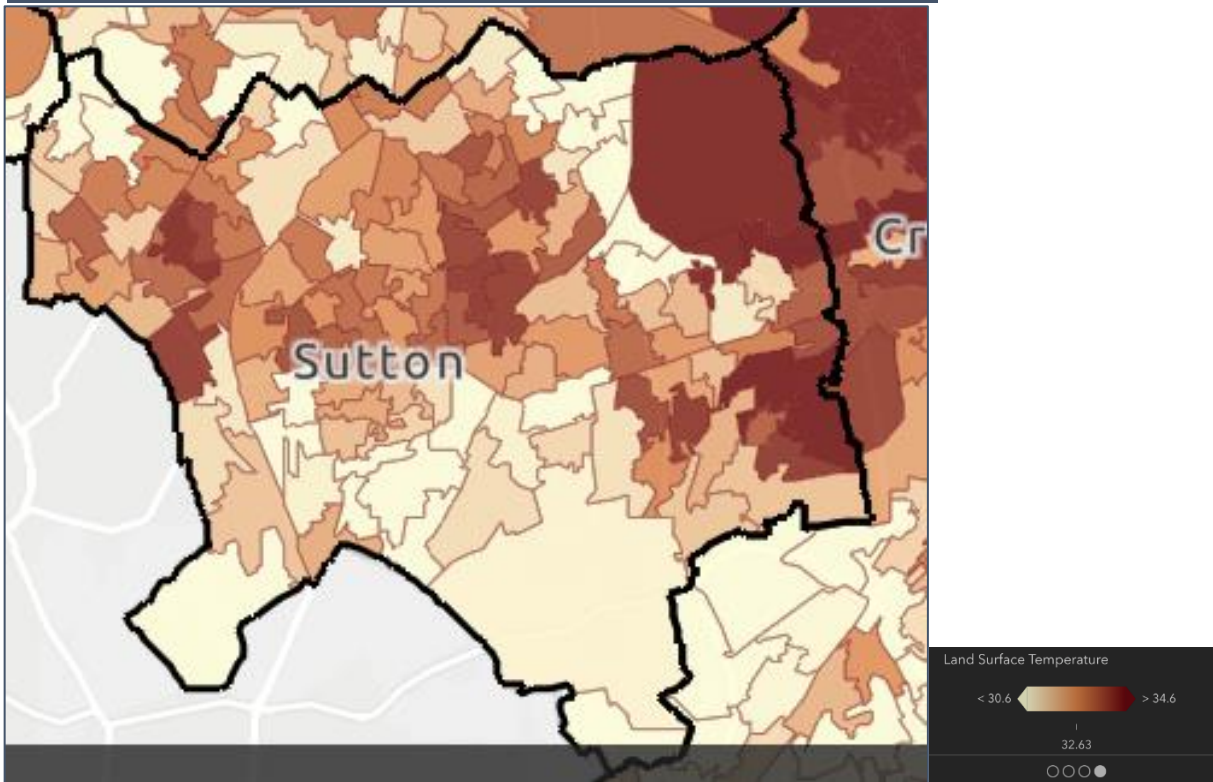
Source: Climate Just website October 2020

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

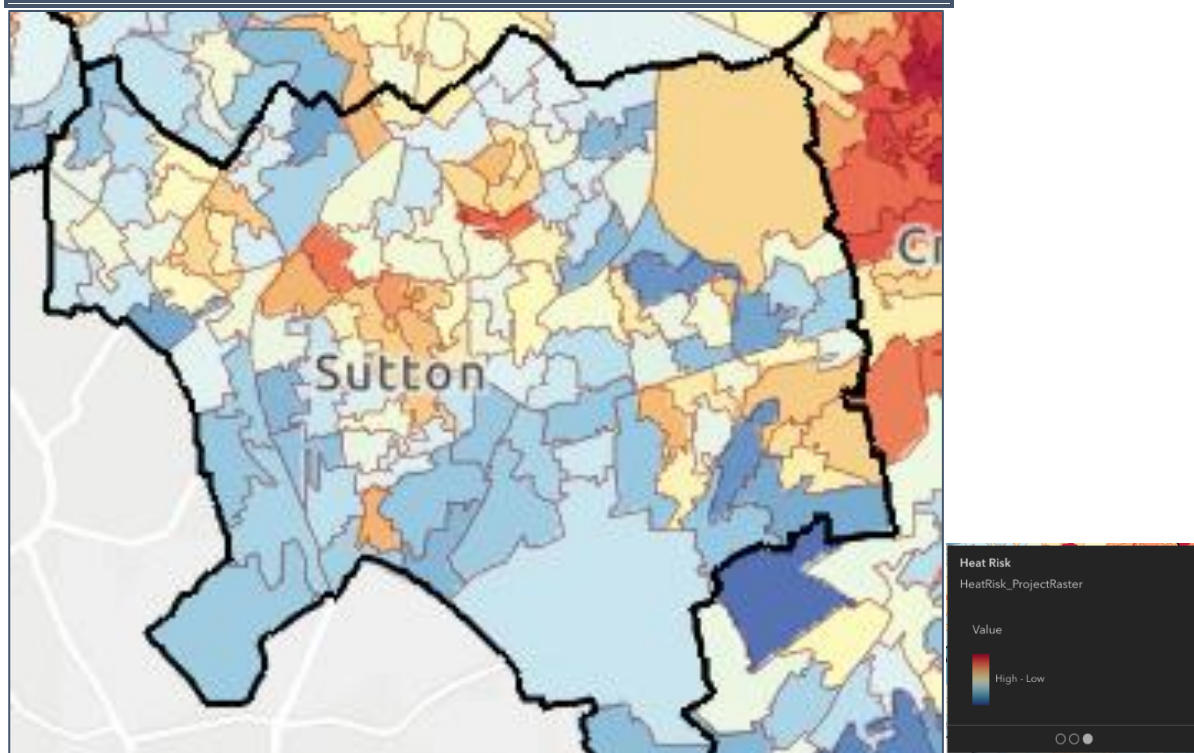


Source: GLA climate exposure mapping 2022

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.

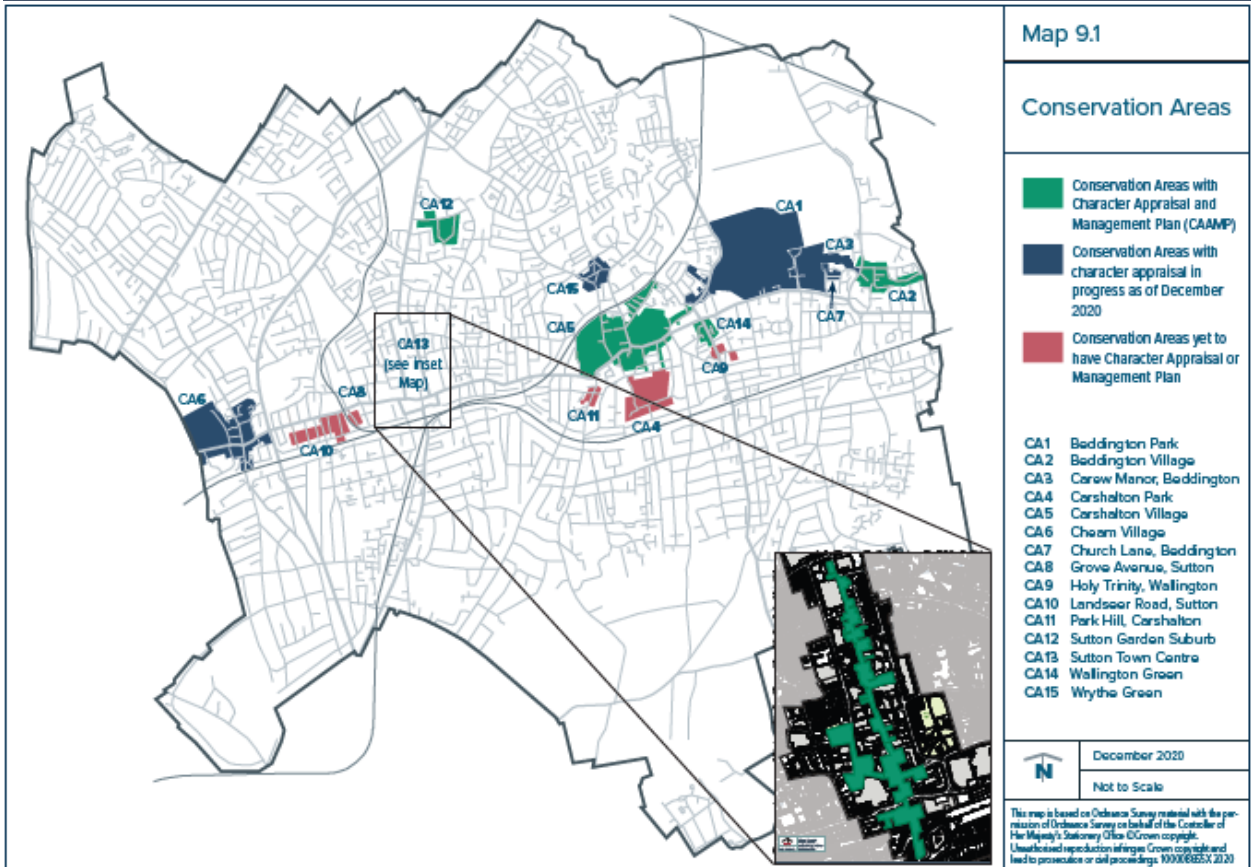
BUILT AND HISTORIC ENVIRONMENT

Conservation Areas

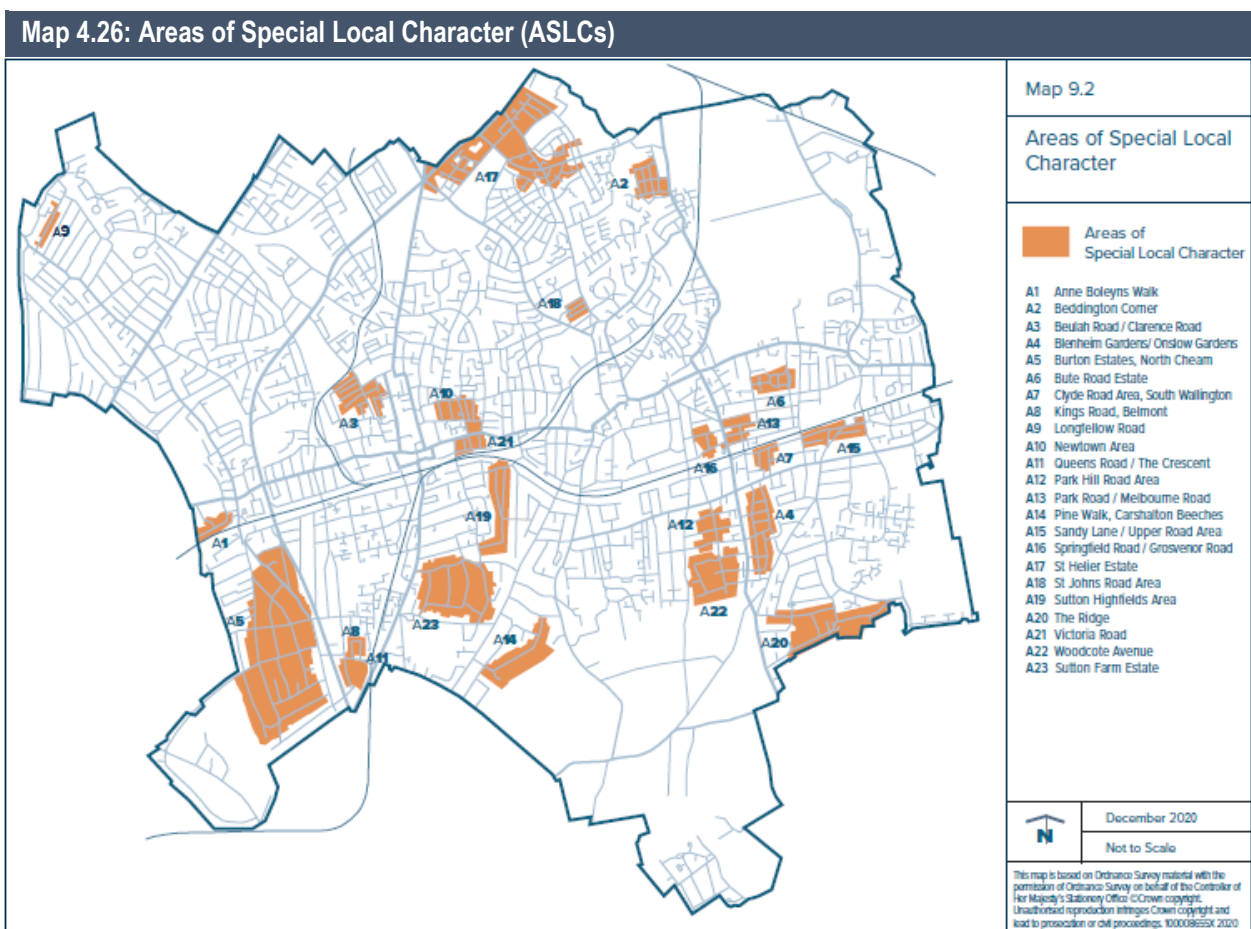
No.	Conservation Area	Area (ha)	Designated (amended)	CAAMP Approved?
1.	Beddington Park Conservation Area	58.6	1970 (1977)	YES
2.	Beddington Village Conservation Area	8.5	1994 (2018)	YES
3.	Carew Manor Conservation Area	15.1	1970 (1977)	YES
4.	Carshalton Park Conservation Area	14.2	1993	n/a
5.	Carshalton 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.

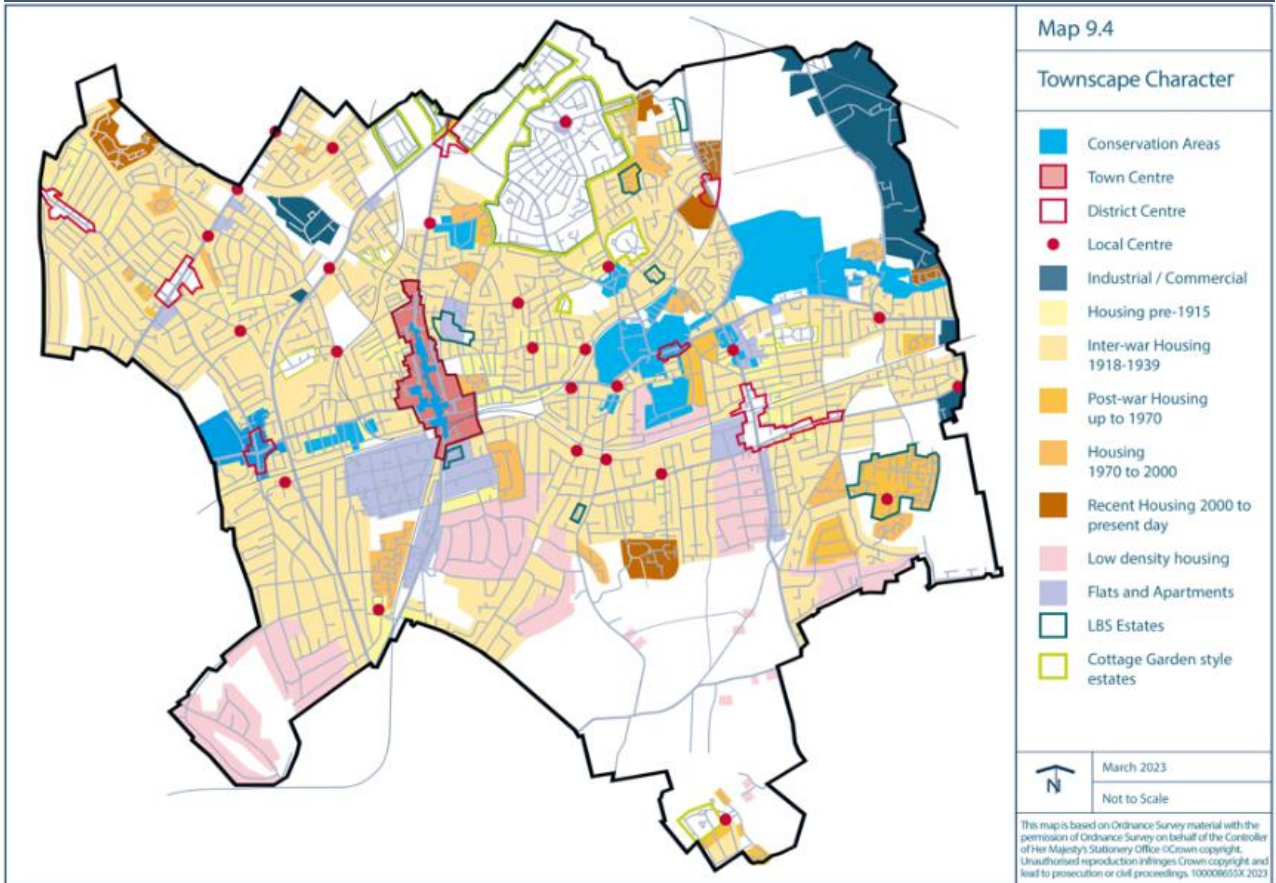
⁶⁶ Statutory listed buildings and structures are available on the Historic England website at <https://historicengland.org.uk/listing/the-list/>

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

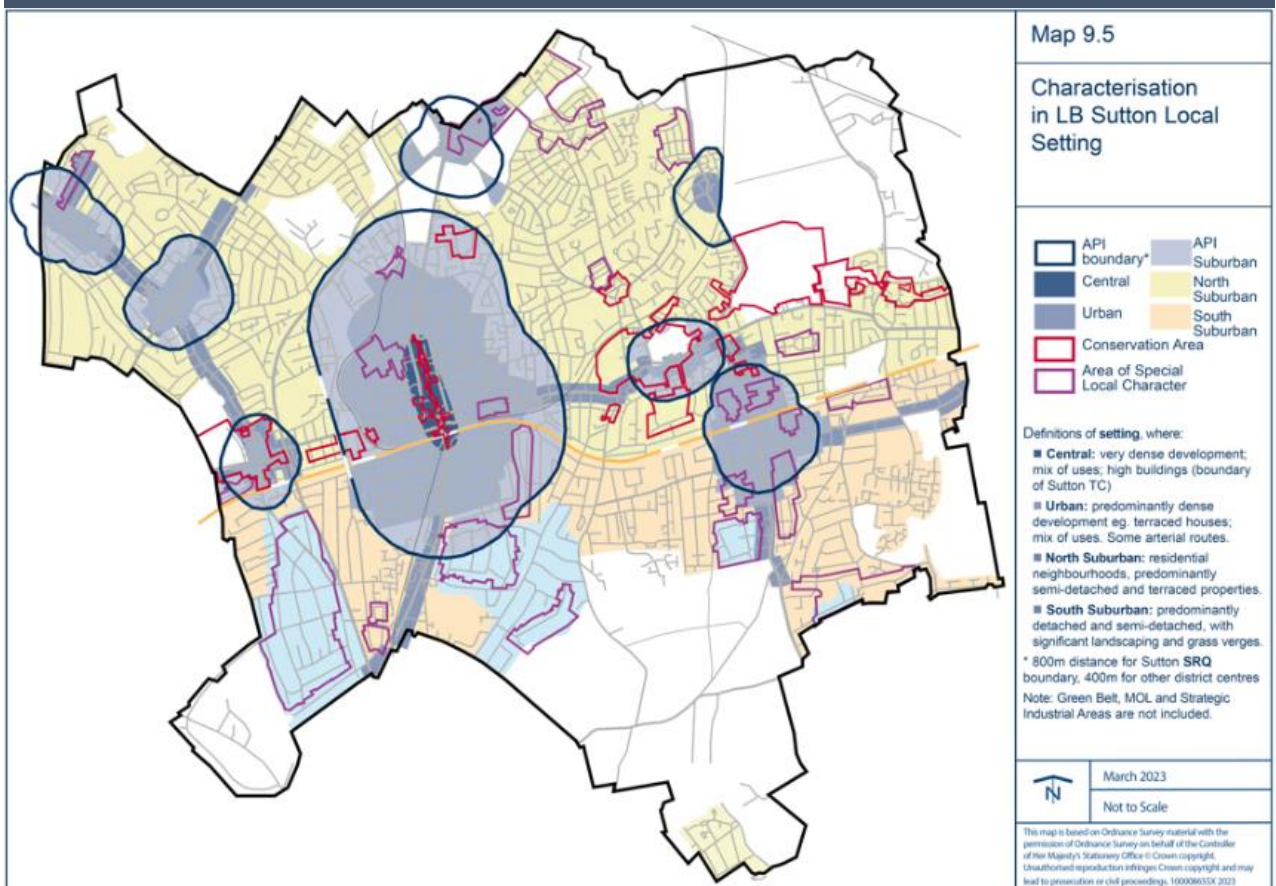
⁶⁸ English Heritage's 'Buildings at Risk' Register is available at <https://historicengland.org.uk/>

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

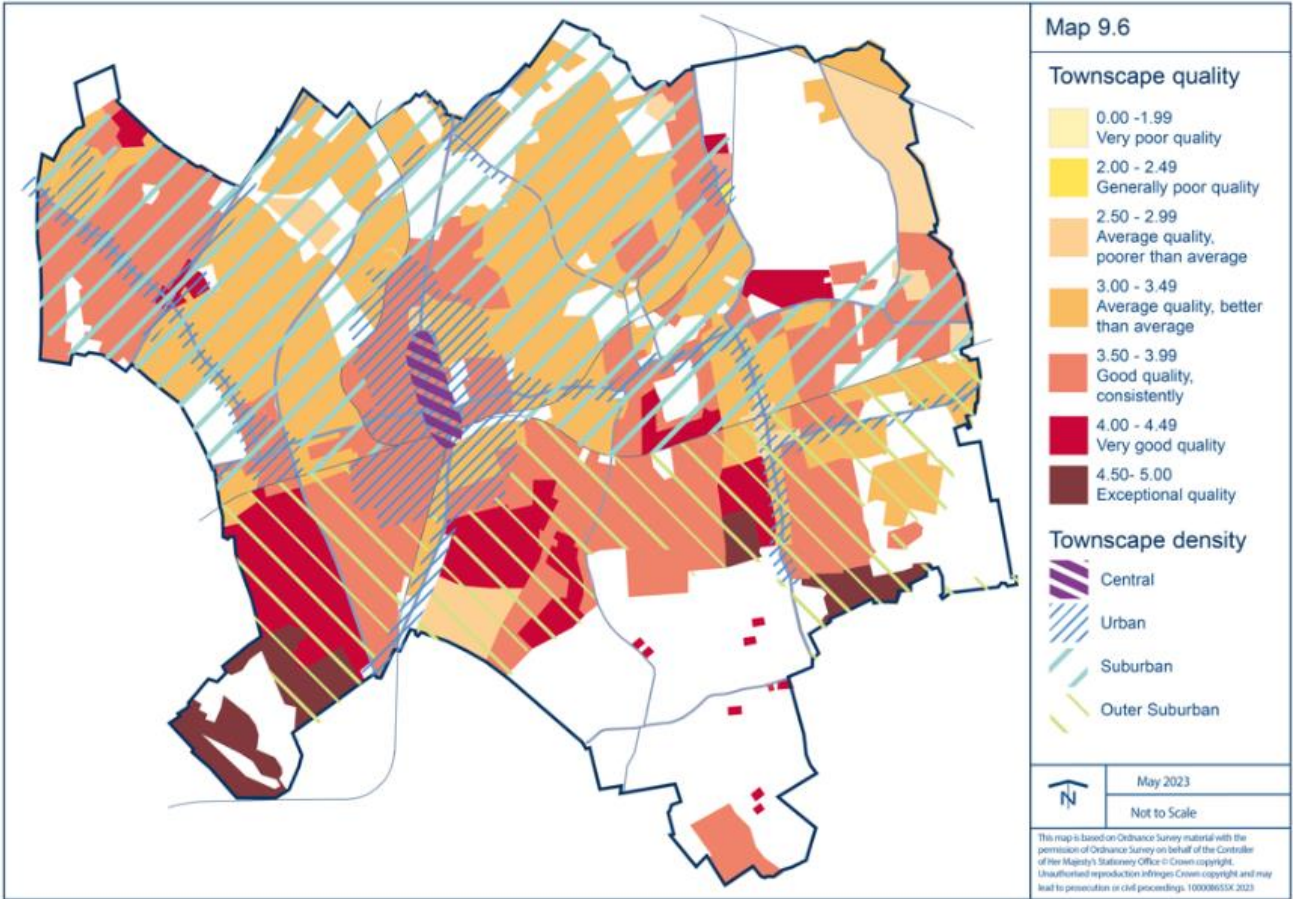
Map 4.27: Borough Character Study 2023 - Townscape Character Map



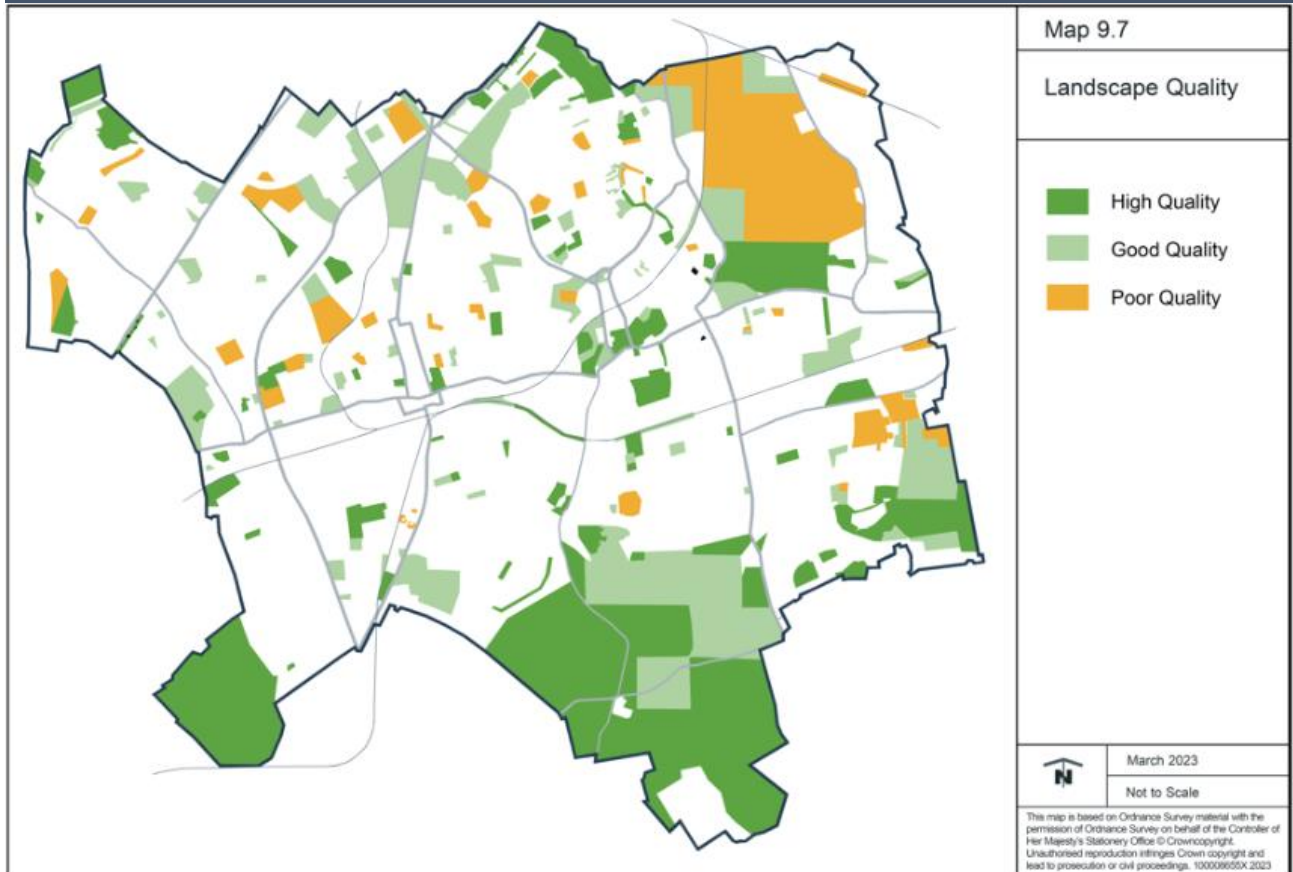
Map 4.28: Borough Character Study 2023 - Local Settings



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

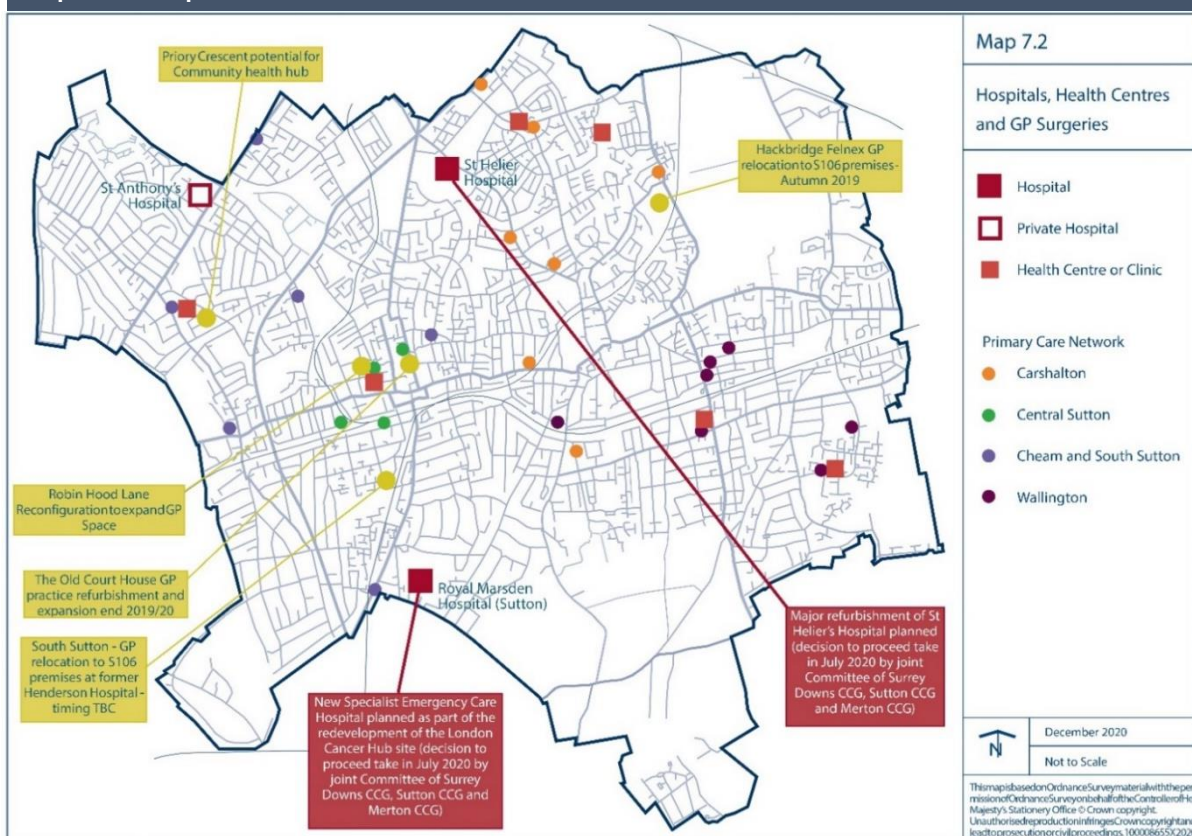
Year	2019-20	2020-21	2021-22	2022-23	2023-24	2024-25
Projected Need for Reception Places	2533	2,511	2,462	2,309	2,308	2,260
Projected Need with 5% unfilled	2,660	2,637	2,585	2,425	2,424	2,373
Planned Provision of Reception Places	2,602	2,602	2,602	2,602	2,602	2,602

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

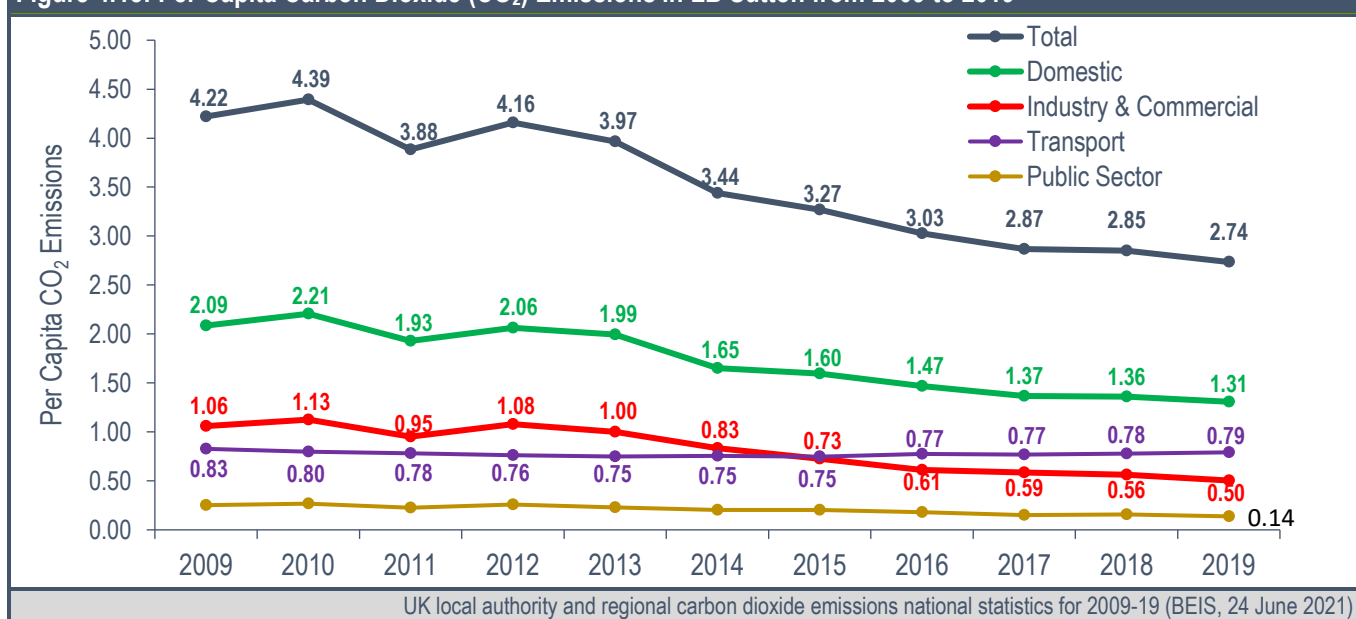
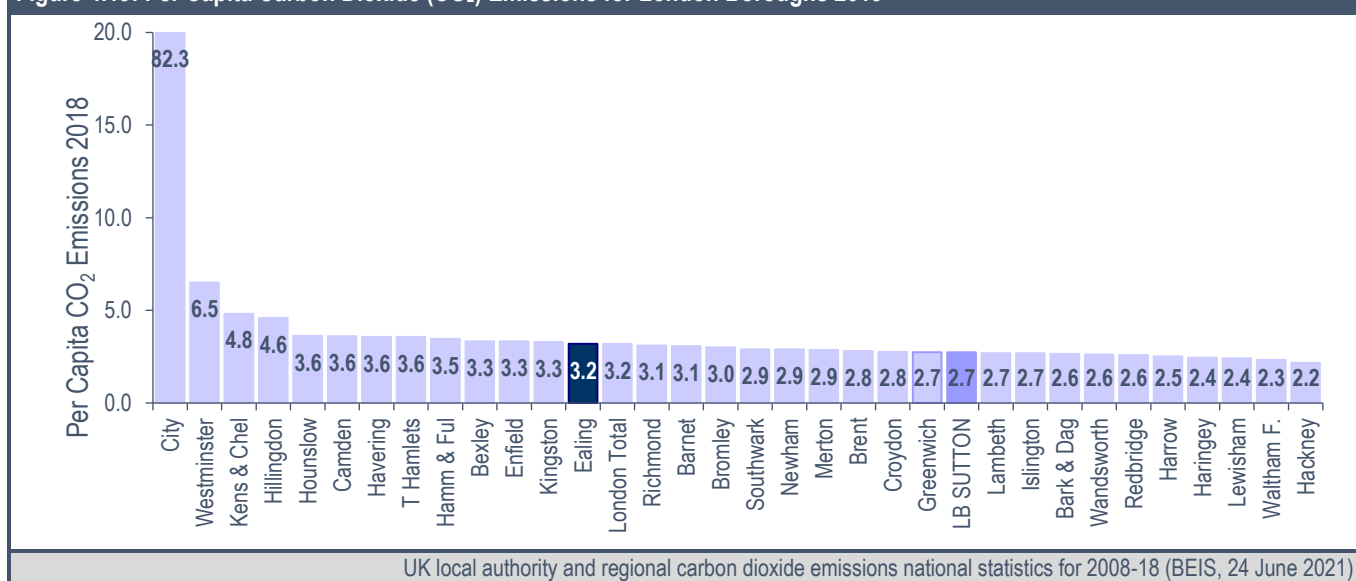


Figure 4.19: Per Capita Carbon Dioxide (CO₂) Emissions for London Boroughs 2019



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>

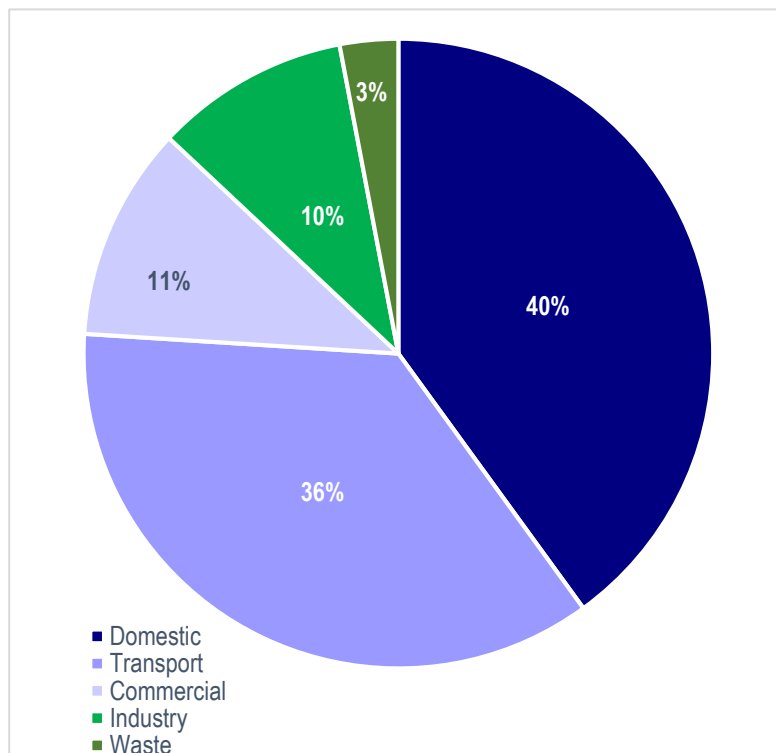
Review of Borough Carbon Emissions

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



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.

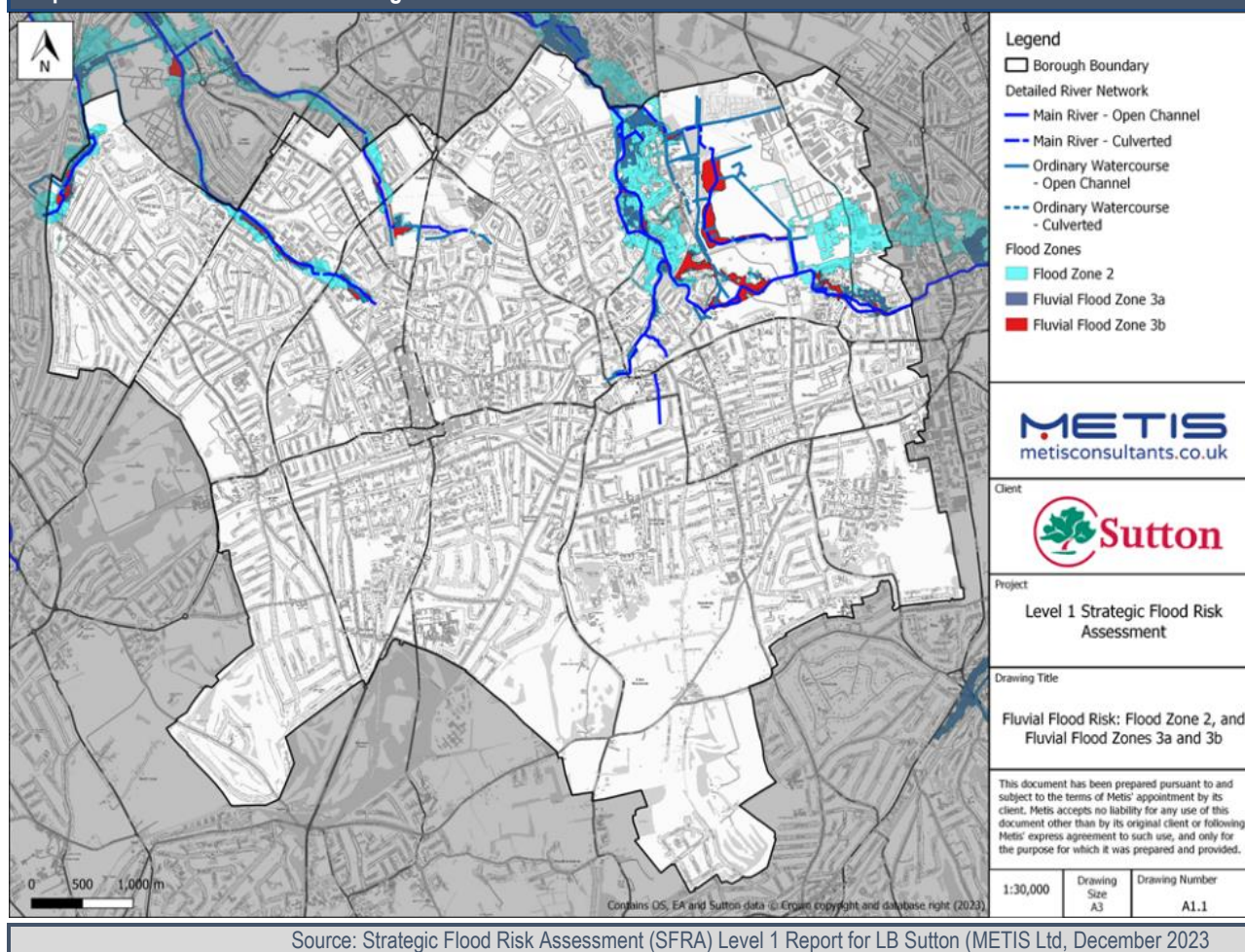
Fuel poverty and energy efficiency

- 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

Map 4.32: Fluvial Flood Risk - Borough



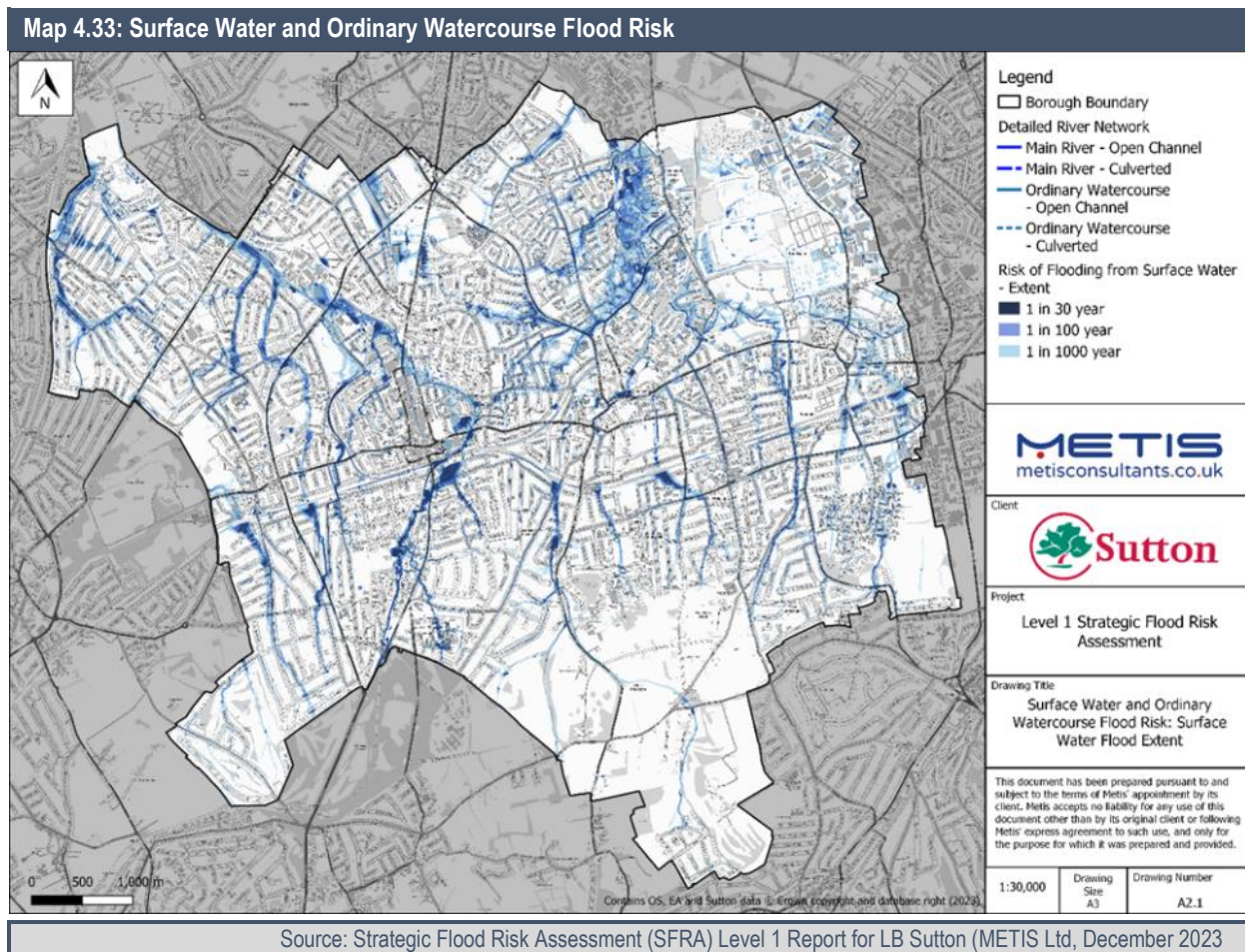
Source: Strategic Flood Risk Assessment (SFRA) Level 1 Report for LB Sutton (METIS Ltd, December 2023)

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

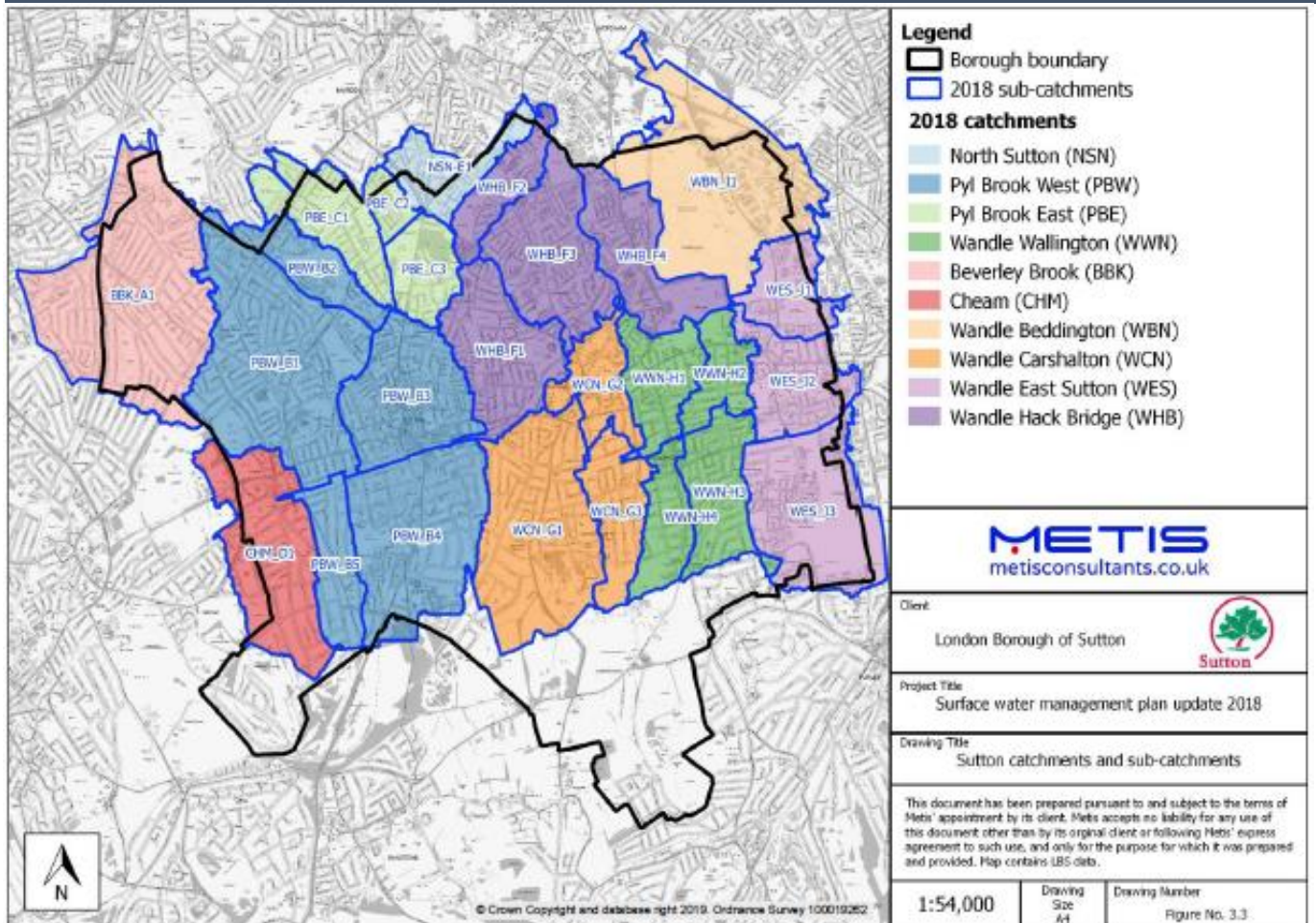
National planning policy on flooding has become increasingly catchment-focused over the past decade. This approach also better matches the Environment Agency's river basin approach used for fluvial flood risk management. Accordingly, Sutton's approach is now based on the delineation of hydrological / 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)

The total budget for this scheme is estimated to be £970,000 at the concept design phase. The match funding from TWU and EA is expected to be £471,000 and the Council has a capital allocation for this scheme of £680,000. This is allocated for 2021/2022 but will also rollover to following years where necessary. The anticipated start date on site for this scheme was Spring 2022, subject to detailed design and consultation. This scheme aims to alleviate flooding in the local area for residents in the future, up to a return period of 1 in 30 year storms. The concept design consists of proposed wetlands and dry basins that will attenuate storm water before releasing it back into the TWU sewer network at a controlled rate.

- **Work completed:** Outline Business Case (OBC) submitted from the EA to the National Project Assurance Service (NPAS) (the EA's external reviewer) to review Grant in Aid application for £371,000 to start detailed design and stakeholder engagement phase. The NPAS have recommended approval of the OBC.
- **Next steps:** Awaiting proposal from consultant for detailed design and stakeholder engagement phase of the project.

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

This project covers a large catchment area and is currently at the feasibility stage. A bid for TWU funding has already been submitted amounting to around 10% of the total budget. This is because the scheme would reduce the flows into the TWU sewer network

- **Work completed:** Feasibility report written and presentation prepared to present initial design solution
- **Next steps:** Other funding streams to be identified, presentation proposal from consultant to be reviewed to engage potential stakeholders for scheme

Rosehill Park Flood Alleviation Scheme

This flood alleviation scheme proposes to provide protection to the sports centre (Sutton Sports Village), surrounding properties and playground reducing the risk of flooding to these locations, including accounting for any development, such as the approved new Special School. This location floods frequently due to lack of capacity in the culvert that runs through the site via the Pyl Brook. Modelling has demonstrated that this scheme could mitigate flooding to these properties for an event of 1 in 30 years in the future. The concept design includes construction of a detention basin in the form of an earth bund with a flow control device to release the stored water gradually into the Pyl Brook.

- **Work Completed:** TWU funding bid has been submitted but was not deemed a benefit to their existing sewer network. An initial submission to the GLA's Green and Resilient Spaces fund, has been successful. However a stage 2 submission is required to secure up to 70% of the total budget.
- **Next steps:** Requires funding before detailed design can proceed. Potential sources being considered include Community Infrastructure Levy (CIL) and National Heritage Lottery funding.

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>

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

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'. ⁸⁶	85.6% (500 of 584)	100.0% (353 of 353)	100.0% (347 of 347)	100%	✓
Proportion of <i>all</i> 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.

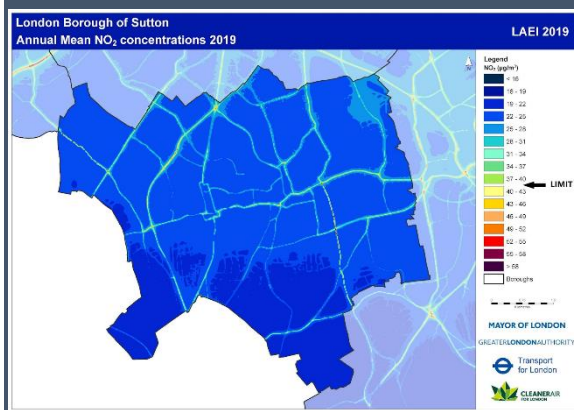
Air Quality Management Areas (AQMAs) and Air Quality Focus Areas (AQFAs)

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

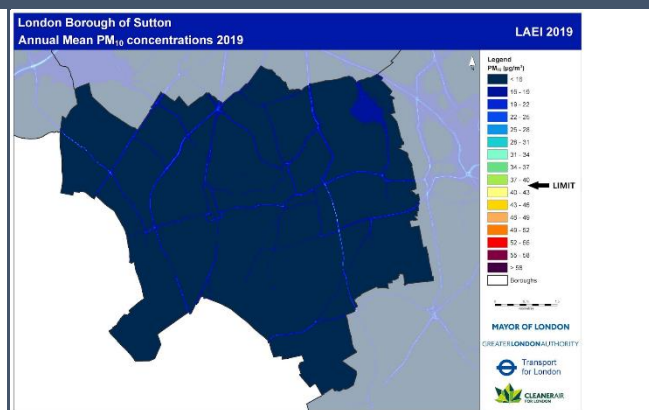
- NO₂ - because levels of this pollutant were continuing to fail the relevant national targets and air quality modelling indicated that these targets were likely to be breached at a number of other locations; and
- Particulates (PM10s and PM2.5) - levels were meeting national targets, but were continuing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

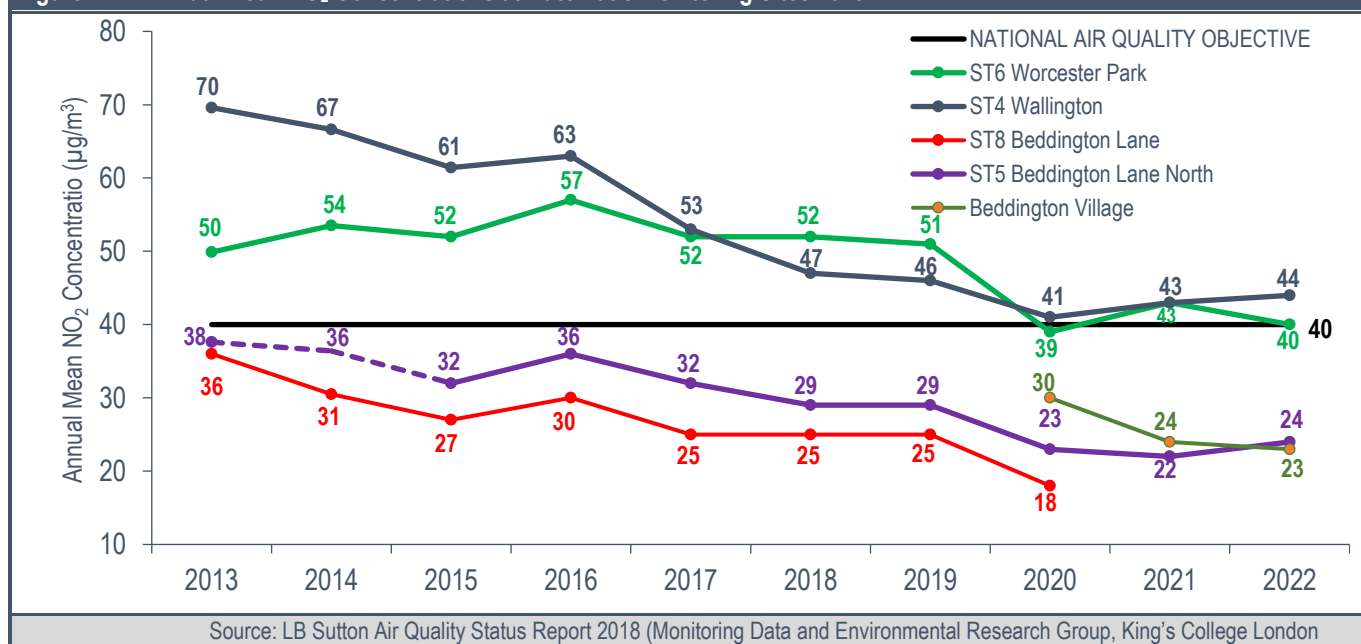
Nitrogen Dioxide (NO₂) – Automatic Monitoring Sites

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 London)⁸⁷

* 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)

⁸⁷ 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

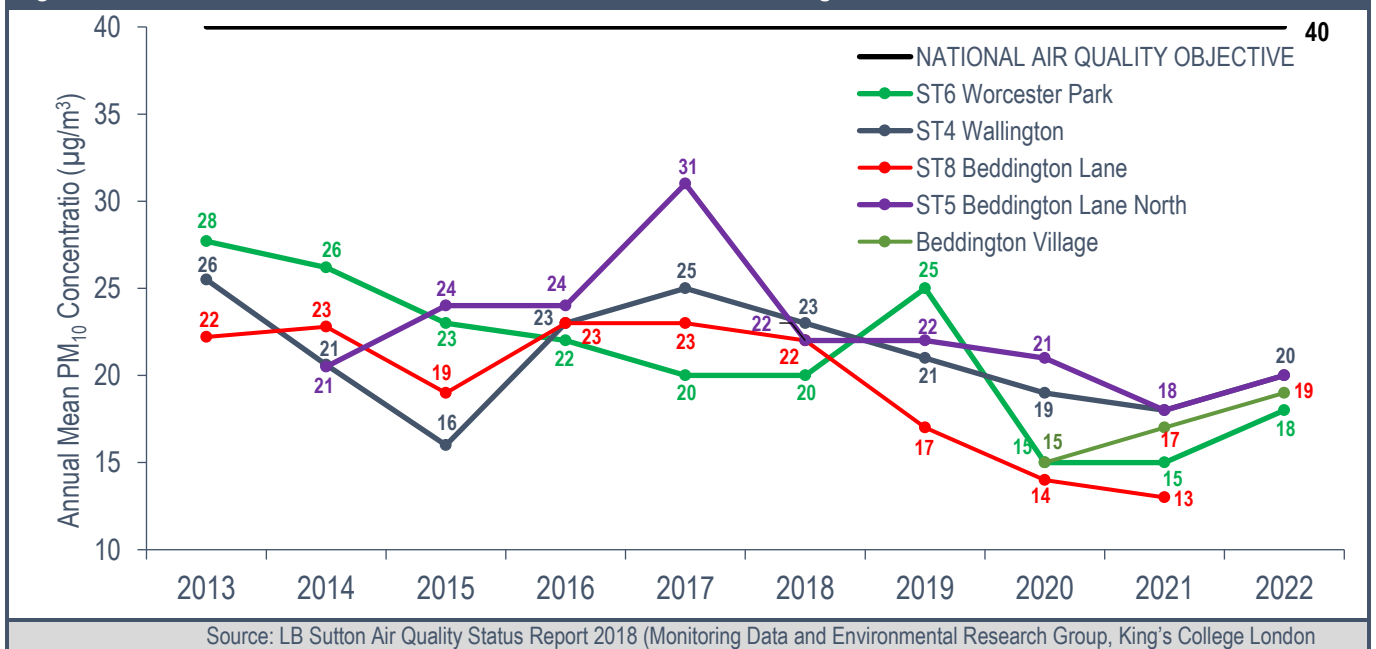
Pollutant	National Air Quality Objective/ Local Plan Target	2020		2021	
		Level	Target Met?	Level	Target Met?
WALLINGTON (ST4)*					
PM10	40 µg/m ³ as an annual mean	18 µg/m ³	✓	20 µg/m ³	✓
PM10	50 µg/m ³ as a 24 hour mean, not to be exceeded more than 35 times a year	0 µg/m ³	✓	0 µg/m ³	✓
BEDDINGTON 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 100.⁸⁸

Sources: LB Sutton Draft Sustainable Transport Strategy 2020

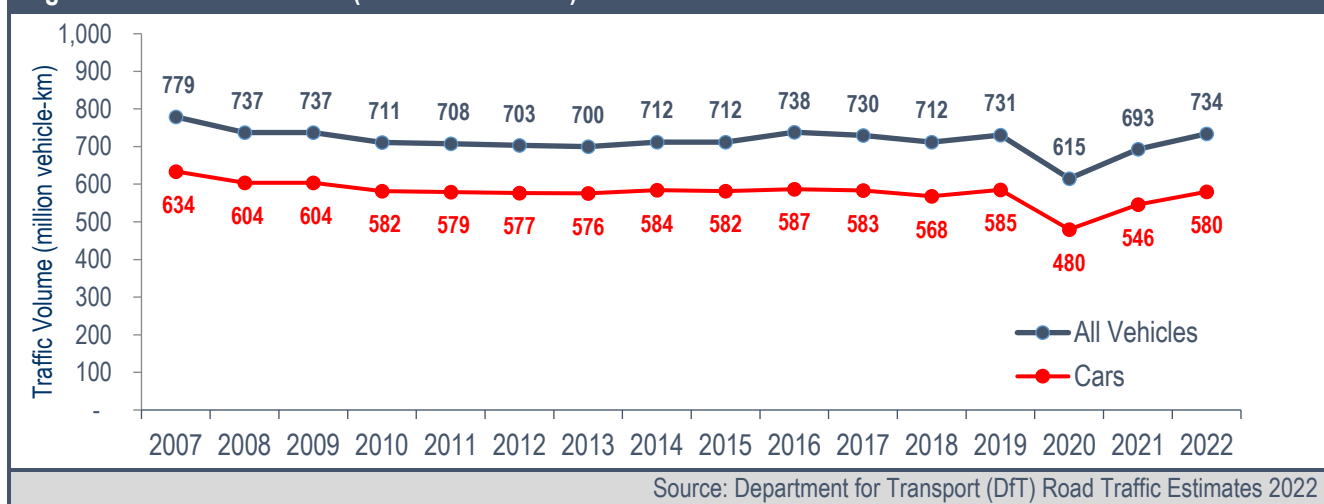
SUSTAINABLE TRANSPORT

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 2022⁸⁹

Figure 4.23: Traffic Volumes (million vehicle-km) in LB Sutton 2005-22⁹⁰



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)

⁸⁸ Transport for London (TfL) Travel in London Report 13 available at <http://content.tfl.gov.uk/travel-in-london-report-13.pdf>

⁸⁹ 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.

⁹⁰ 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

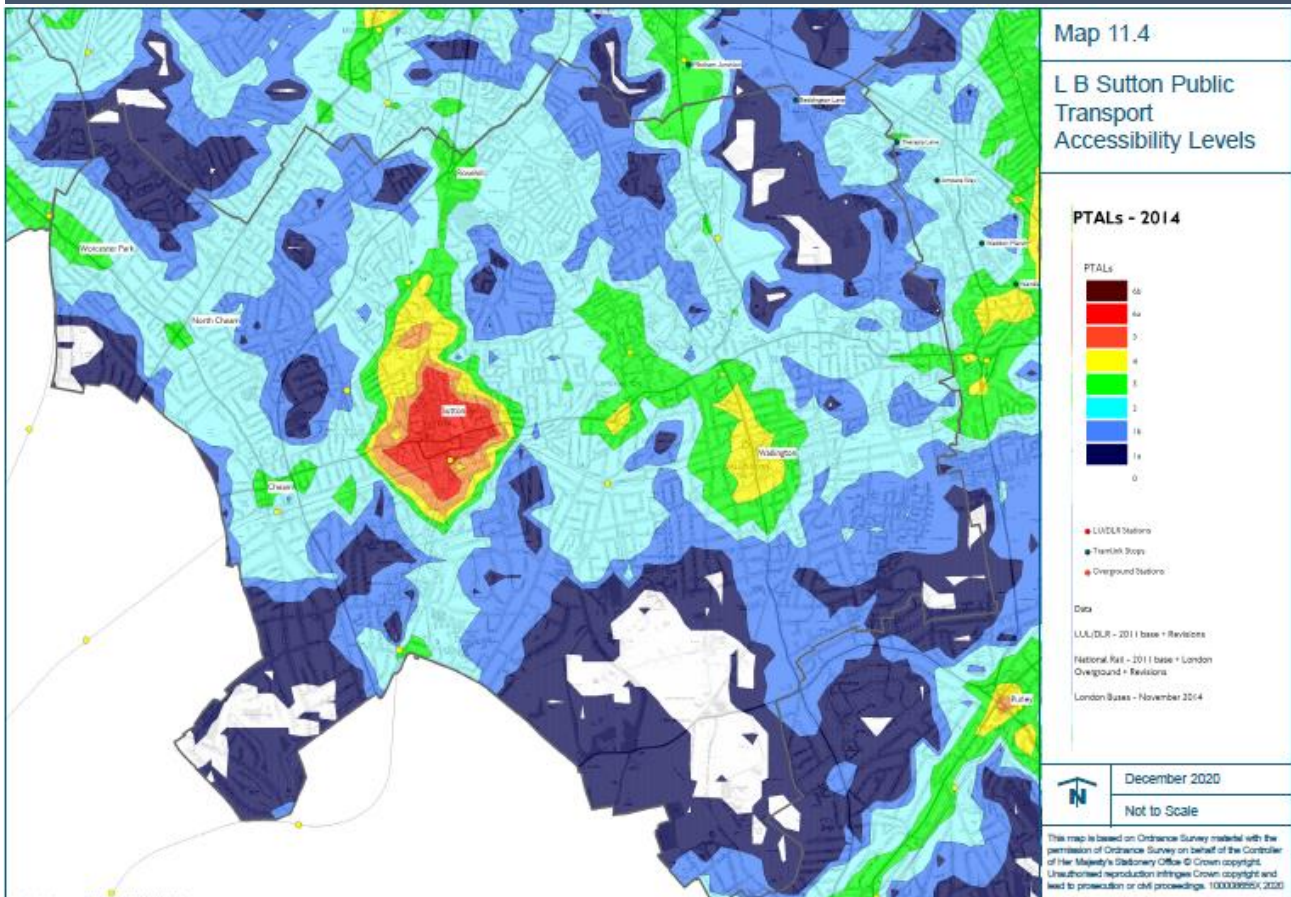
Public Transport Accessibility

Notes

The GLA's latest Public Transport Accessibility Levels (PTAL) map⁹¹, 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

⁹¹ 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%

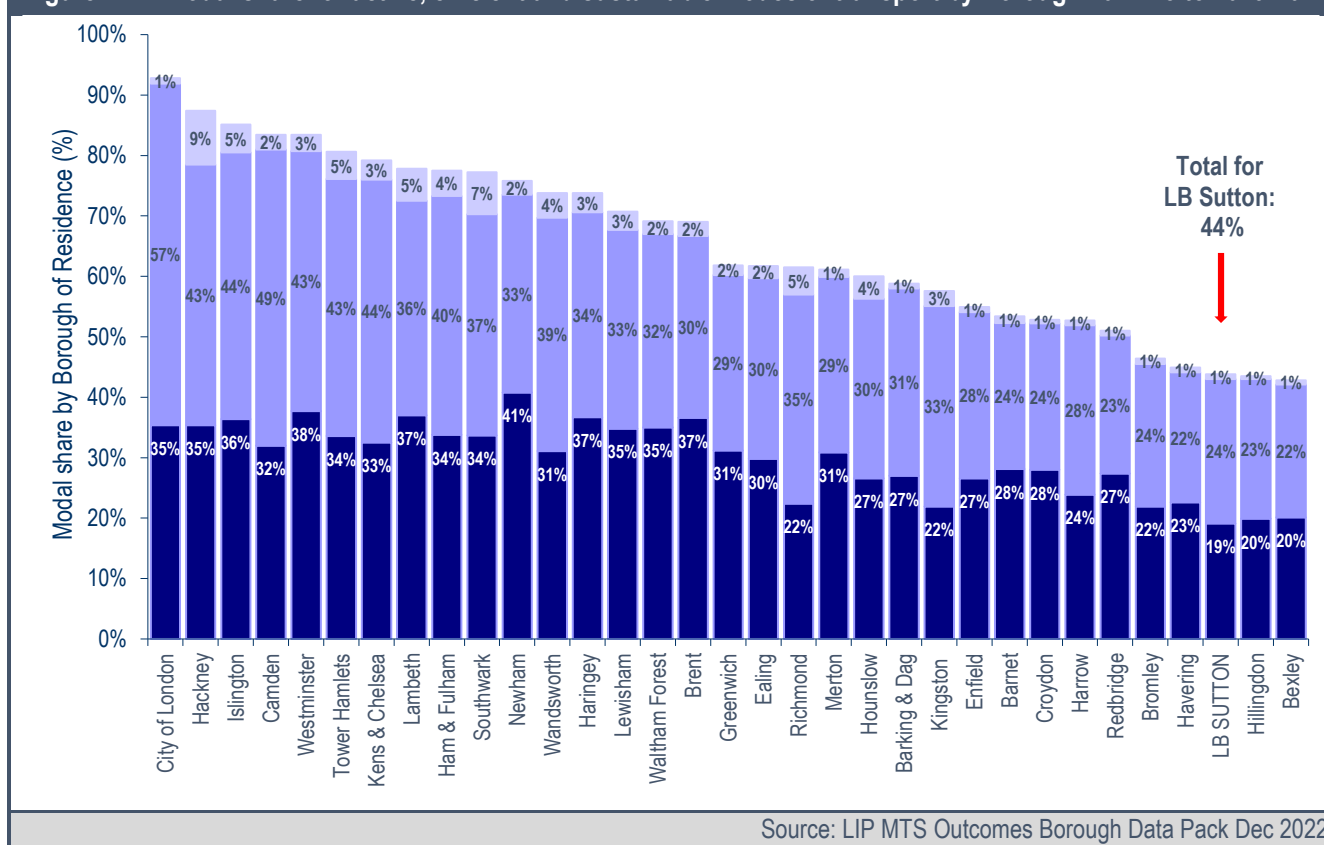
Source: TfL Travel in London Report 13 data (2021) & Healthy Streets Scorecard data

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

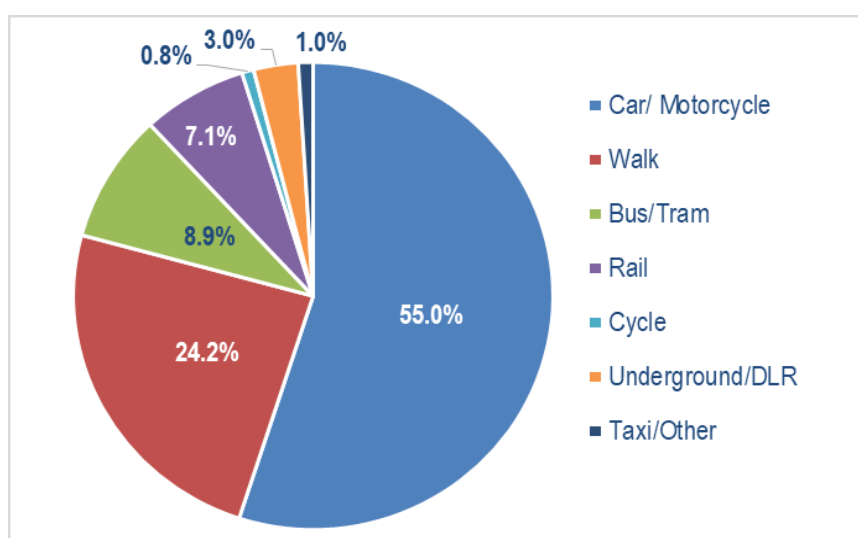
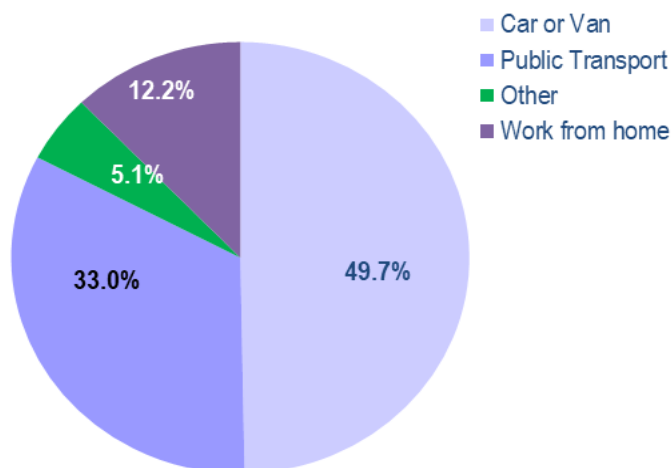


Figure 4.26: Modal share for journeys to work originating in LB Sutton 2017-18 to 2019-20

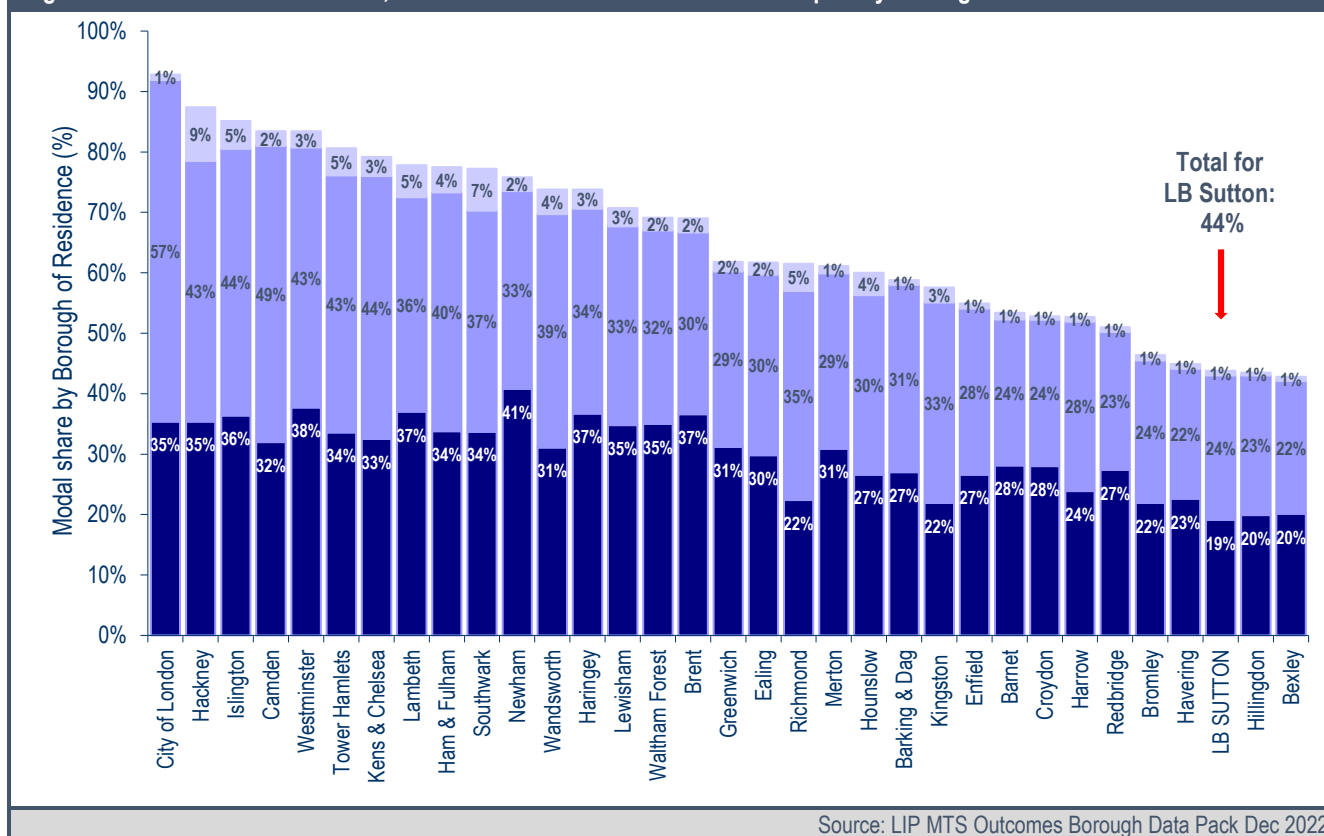


Borough residents taking up active travel

	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

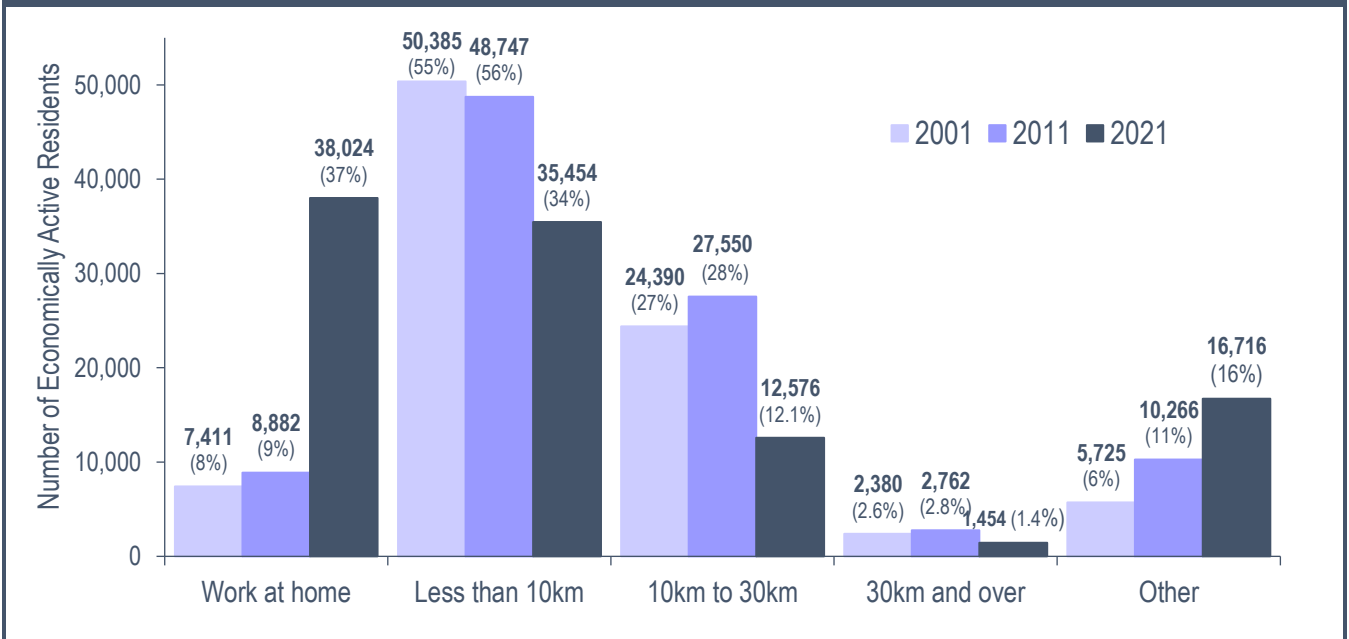
	Percentage of residents within 400m of strategic cycle network ⁹²						
	2020	2021	2022	Annual Change 2021 to 2022	LIP Target		2021 Target Met
					2021	2041	
LB Sutton	0%	0%	0%	0% pts	24%	37%	X
Outer London	8.5%	9.5%	12.3%	+2.8% pts	n/a	n/a	n/a
London	19.7%	21.4%	24.2%	+3.8% pts	26%	70%	X

Source: TfL GIS analysis and Strategic Cycling Analysis

⁹² 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

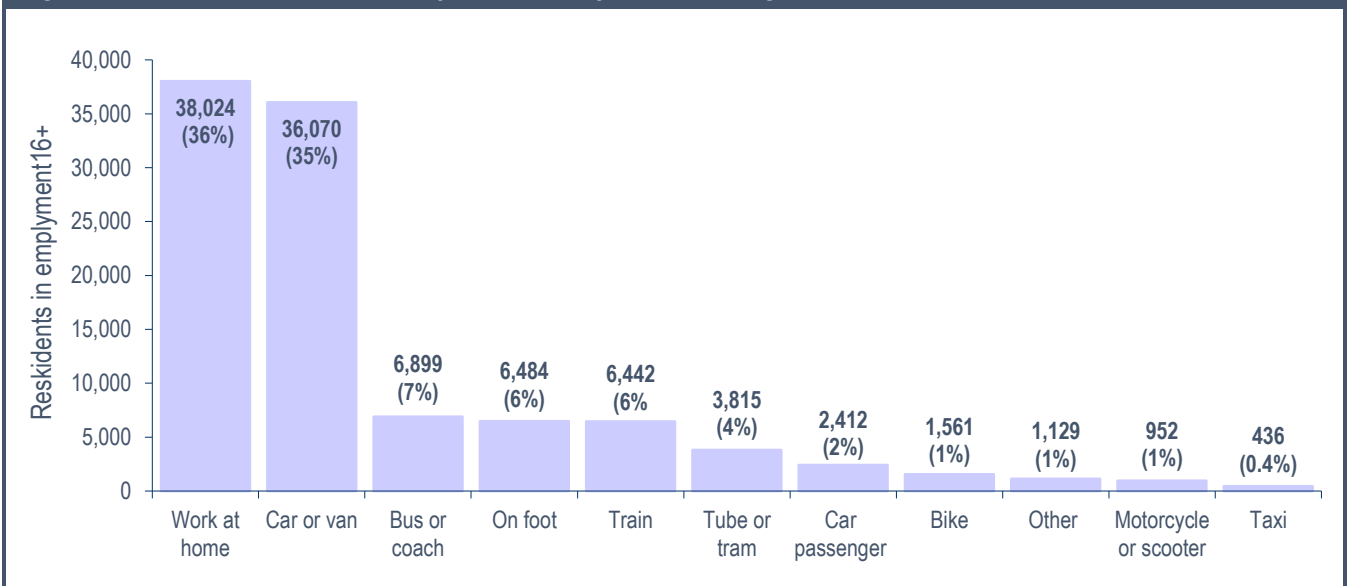
Travel to Work – Changes from Census 2001 to Census 2021

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);
- **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 NO_x 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?

5.26 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

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

5.28 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

5.29 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.

5.30 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?

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

5.32 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?

5.33 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 planning practice guidance)?

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 in the Local Plan to ensure that development proposals 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?

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 the Local Plan require basement impact assessments (BIA's) to be prepared in support of all basement developments?

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

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.*
- *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 Environment Agency (EA) to identify strategic locations for flood alleviation schemes and water storage areas within 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 process seek to demonstrate the acceptability of potential windfall site 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 located within Flood Zone 1 where there is evidence of flood risk from surface water, groundwater and/or sewer flooding sources 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 (from all sources) 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 coordinated 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);
- 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;
- 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.

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

Strategic open land

5.65 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.

5.66 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?

5.67 Should the Local Plan re-introduce a policy objective to maintain green chain linkages throughout the borough?

5.68 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 ?

5.69 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

5.70 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?

5.71 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.

5.72 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?

5.73 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

5.74 How can the Local Plan deliver a greener borough which is fully adapted and resilient to climate impacts, including heatwaves, flooding and drought conditions;

5.75 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*" ?

5.76 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?

5.77 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)

5.78 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?

5.79 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?

5.80 Should all developments be required to incorporate biodiverse green roofs where feasible?

5.81 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?

5.82 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)

5.83 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?

5.84 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?

5.85 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?

5.86 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

Nature conservation sites

5.87 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

5.88 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?

5.89 How can the Local 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)?

5.90 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 be 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

5.91 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 Strategy when introduced):

- support the delivery of the 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.

5.92 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.

Biodiversity net gain (BNG)

5.93 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?

5.94 How can the Local Plan approach to BNG be sufficiently flexible to ensure that 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)?

5.95 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?

5.96 How can the Local Plan's approach to BNG support and be aligned with Sutton's local nature recovery strategy and biodiversity strategy objectives?

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- 5.97** 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?
- 5.98** 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)⁹⁷? 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)?
- 5.99** 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?
- 5.100** 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)?
- 5.101** How can the Local Plan's approach to BNG be coordinated with neighbouring boroughs in order to enhance strategic habitat linkages/ green corridors?
- 5.102** 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?
- 5.103** 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 Reports⁹⁸; 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).
- 5.104** 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)?
- 5.105** The need to ensure that biodiversity tariffs are reviewed and updated in order 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 and only if offsetting is not possible on Council-owned land

Backgarden land

- 5.106** 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?
- 5.107** 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) ?
- 5.108** 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)
- 5.109** 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;

⁹⁷ some local planning authorities have gone beyond the mandated 10% uplift e.g. Kent County Council (20%) and RB Kingston (30%)

⁹⁸ 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/>

- 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.

5.110 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. :

5.111 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

5.112 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

5.113 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?

5.114 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?

5.115 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?

5.116 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?

5.117 Should the Local Plan continue to require developers to produce and implement green travel plans and introduce car clubs as part of new development?

5.118 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?

5.119 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?

5.120 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)

5.121 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.

5.122 Should the Local Plan go further in promoting car-free developments in locations well served by public transport?

Healthy streets

5.123 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?

5.124 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.

5.125 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

5.126 The need to secure the delivery of electric vehicle charging infrastructure in appropriate locations

Air Quality

5.127 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.

5.128 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

5.129 What types of development should be supported by Air Quality Assessments?

5.130 What types of development should be required be 'air quality neutral' or 'air quality positive', based on the Mayor's adopted benchmarks?

5.131 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)

5.132 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?

5.133 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

5.134 How can the Local Plan to address the challenges and opportunities faced by Sutton Town Centre over the next 10-15 years in order 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?

5.135 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;
- create a distinctive South London destination with culture, leisure and residential activity;
- comprehensive redevelopment of the the civic centre;
- 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

5.136 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.

5.137 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.

5.138 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?

5.139 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?

5.140 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

5.141 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?

5.142 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

5.143 Is there a need for a green infrastructure (GI) strategy be developed for each district centre as part of the Local Plan?

5.144 Is there a need for a biodiversity net gain (BNG) target be developed for each district centre?

5.145 Is there a need for a SuDS retrofit strategy be developed for each district centre/ or locality within the Borough?

5.146 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

5.147 How much retail and food and beverage floorspace should be planned for in order to meet Borough needs over the next 10-15 years?

5.148 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).

5.149 Should a more flexible approach to town centre development be taken to enable town centre uses other than shops to locate in town centres?

5.150 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,?

5.151 How can the Local Plan resist the loss of retail floorspace to other uses particularly within primary retail frontages?

5.152 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?

5.153 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

5.154 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?

5.155 To what extent should additional industrial floorspace be delivered through the intensification or reconfiguration of existing employment sites and premises?

5.156 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?

5.157 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;

5.158 Should loss of employment land to other non-industrial (& non-waste) uses be permitted under some circumstances?

5.159 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?

5.160 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

5.161 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).

5.162 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

5.163 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?

5.164 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

5.165 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.

5.166 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?

5.167 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?

5.168 How can the LCH site will support the Council in delivering against its Climate Emergency objectives?

Sutton Link/Tramlink

5.169 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?

5.170 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?

5.171 Should the Local Plan promote an alternative public transport scheme such as Sutton Link?

5.172 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

5.173 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

5.174 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

5.175 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;

5.176 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??

5.177 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?

5.178 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?

5.179 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?

5.180 How can the Local Plan meet the London Plan target for deliovering additional dwellings on small sites (Sutton's target is set at 268 ndpa or 2,680 over a 10 year period)?

5.181 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?

5.182 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?

5.183 How can future housing growth over the plan period be distributed sustainably throughout the Borough?

- focus most housing growth within Sutton Town Centre; enabl 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.

5.184 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

5.185 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?

5.186 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

5.187 Should the Local Plan require in-lieu payments for affordable housing on proposals of less than 10 units?

5.188 What should be the proportions of affordable housing for social//affordable-rented properties and intermediate housing (tenure split)?

5.189 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?

5.190 Under what circumstances if any should Local Plan policy allow for the provision of affordable housing off-site?

(10) SOCIAL INFRASTRUCTURE/ COMMUNITY FACILITIES

Education

5.191 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)

5.192 Are any further locations suitable for developing new secondary and primary schools in the longer term?

Health

5.193 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.

5.194 Should the Local Plan continue to safeguard land at the London Cancer Hub (LCH) site for the proposed Sutton Specialist Emergency Care Hospital (SECH)?

5.195 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

5.196 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?

5.197 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

5.198 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?

5.199 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?

5.200 Should potential site allocations for inclusion in the Local Plan seek to include greater detail on design matters?

5.201 How can the Local Plan form the basis for the development of future Design Codes on built design?

5.202 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

5.203 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

5.204 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?

5.205 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?

5.206 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)?

5.207 Should Local Plan policies be strengthened to further protect and enhance the amenities of residents occupying adjoining properties?

5.208 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

5.209 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?

5.210 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?

5.211 What is the potential for mid-rise residential buildings, such as mansion blocks or terraces, for achieving intensification while retaining a human scale?

Heritage

5.212 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?

5.213 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?

5.214 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

5.215 How can Local Plan policies help to promote healthy and active lifestyles and transport choices for Borough residents of all ages”?

5.216 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?

5.217 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'

5.218 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)?

5.219 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?

5.220 How can Local Plan policies help to address crime reduction and community safety?

Housing accessibility

5.221 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?

5.222 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))?

5.223 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.

5.224 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?

5.225 Should new new residential developments be required to meet or improve upon the Mayor's minimum private amenity space standards set out in the London Plan 2021 Space Standards?

5.226 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?

5.227 Should play space and informal recreation space standards be aligned with London Plan 2021 Space Standards?

Gypsy and travellers

5.228 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?

5.229 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?

5.230 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 needs to develop a 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. This is based on 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 and Sutton's AMR 2021-22 (Task A2) and the key sustainability issues and problems identified in Section 5 (Task A3). It is essential that the updated SA Framework for Sutton's Local Plan, when finalised, reflects the ambitions of the council in responding to the climate emergency and working towards a net zero carbon Borough

6.2. When finalised, it is intended that the SA Framework will consist 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 tur, each core sustainability objective is broken down into a number of sub-topics.

6.3. Table 6.1 provides an outline of the SA Framework and it is intended that the next SA Report to be published for public consultation at the Issues and Preferred Options stage later in 2024 will provide more detail in terms of on sub-objectives, indicators and targets. It is intended that a series of questions will also be included in the finalised SA Framework in order to guide the evaluation of alternative policy options.

Table 6.1: Sustainability Appraisal Framework for Sutton's Local Plan - Outline

(A) ENVIRONMENTAL SUSTAINABILITY
<p>(1) CLIMATE CHANGE MITIGATION/ ZERO CARBON</p> <p>Core SA Objective: To address the causes of climate change by minimising CO₂ emissions and promoting zero carbon standards in new development</p> <p>Topics:</p> <ul style="list-style-type: none"> • Carbon dioxide (CO₂) emissions reduction targets • Energy efficiency and demand reduction • Efficient Energy Supply and Decentralised Energy (DE) • Renewable energy • Post construction monitoring and reporting • Carbon offsetting • Whole Life-Cycle Carbon • Environmental Performance Certification Schemes • Cooling and Overheating
<p>(2) FLOOD RISK AND WATER RESOURCES</p> <p>Core SA Objective: To avoid, reduce and manage all sources of flood risk to and from development taking account of climate change</p> <p>Topics:</p> <ul style="list-style-type: none"> • Fluvial (river) flooding and flood resilience • Surface water flooding and Sustainable drainage (SuDS) • Wandle Valley • Water Resources
<p>(3) OPEN SPACE, URBAN GREENING AND BIODIVERSITY NET GAIN (BNG)</p> <p>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</p> <p>Topics:</p> <ul style="list-style-type: none"> • Strategic open land • Public open space • Green infrastructure (GI) (Issue 25) • Nature conservation sites • Green corridors and linked habitats • Local nature recovery strategy, biodiversity action plan (BAP) and tree planting • Biodiversity Net Gain (BNG) • Backgarden land
<p>(4) SUSTAINABLE TRANSPORT, HEALTHY STREETS AND AIR POLLUTION</p> <p>Core SA Objective: To reduce traffic levels, congestion, local air pollution and CO₂ emissions from transport and promote healthy streets</p> <p>Topics:</p> <ul style="list-style-type: none"> • Reducing the need to travel • Reducing car trips promoting active and healthy modes of travel • Healthy streets • Air Quality

(B) SUSTAINABLE ECONOMIC GROWTH

(5) TOWN CENTRES

Core SA Objective: To enhance the vitality and viability of Sutton Town Centre and town centres throughout the Borough

Topics

- Sutton Town Centre
- District centres
- Retail floorspace

(6) INDUSTRIAL LAND AND EMPLOYMENT

Core SA Objective To promote the success of Sutton’s economy and local employment opportunities

Topics

- Employment locations
- Offices

(7) LONDON CANCER HUB (LCH), SUTTON LINK 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

Topics

- London Cancer Hub
- Sutton Link
- Area renewal
-

(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;l housing stock and other buildings.

Topics

- Promoting green business and green jobs
- Circular economy
- Decarbonisation of existing stock

(C) SUSTAINABLE COMMUNITIES

(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

Topics

- Housing growth
- Affordable Housing

(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

Topics

- Education
- Health
- Social, community and cultural infrastructure

(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.

Topics

- Good design
- Local character, townscape quality and residential amenity
- Taller buildings
- Heritage

(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

Topics

- Healthy lifestyles
- Health inequalities and 'climate justice'
- Housing accessibility
- Gypsies and travellers

NEXT STAGES OF SUSTAINABILITY APPRAISAL

6.4. In line with the Government's Planning Practice Guidance (PPG) and the Strategic Environmental Assessment (SEA) Regulations 2004, copies of this SA Scoping Report have been sent to statutory bodies (Environment Agency, Natural England and Historic England), the GLA, key stakeholders (GiGL) and local environmental groups. Consultation will take place over a five-week period from 7 May to 11 June 2024 (see Section 1 for further details of consultation arrangements)..

6.5. Consultation comments will inform the preparation of the SA Report on Local Plan Issues and Preferred Options which will be made available for public consultation later in 2024 (Regulation 18 consultation).

6.6. The Council's SA Framework (Table 6.1) will be further developed and refined at each stage of the preparation of the Local Plan for the purpose of appraisal and plan monitoring. Sutton's Authority Monitoring Report (AMR) will report on the full range of sustainability indicators and targets within the SA Framework, in order to evaluate the effectiveness of the Council's existing and future Local Plan policies in achieving both the objectives of the development plan and of sustainable development

EQUALITIES IMPACT ASSESSMENT

What is Equalities Impact Assessment (EqIA)?

6.7. Equalities Impact Assessment (EqIA) is designed to ensure that plans and policies do not discriminate against specific equalities target groups and, where possible, make a positive contribution to improving quality of life for local communities. The requirement to consider the impacts of Local Plan policies and proposals upon certain equality target groups through the EqIA process arises from the following legislation.

Race Relations (Amendment) Act 2000

6.8. The amendment requires Local Authorities to be pro-active and positive in promoting racial equality. The authorities are required to undertake a Race Equality Impact Assessment of their strategies and plans. Failure to do so may lead to legal action being taken against them by the Commission for Racial Equality (CRE). The CRE is now part of the Equalities and Human Rights Commission (EHRC) as detailed on the next page.

Disability Discrimination (Amendment) Act 2005

6.9. The Act requires local authorities to promote equality of opportunity for disabled people and avoid discrimination. The authorities must ensure that their policies, practices, procedures and services are not discriminatory against disabled people.

Equality Act 2010

6.10. The primary purpose of the Equality Act 2010 was to consolidate the various Acts and Regulations, which formed the basis of anti-discrimination law in the UK. This included the pre-existing Equality Act 2006, the Sex Discrimination Act 1975, the Race Relations Act 1976, the Disability Discrimination Act 1995 and three major statutory instruments protecting discrimination on grounds of religion or belief, sexual orientation or age.

Equalities Impact Assessment as part of Local Plan Preparation

6.11. The first stage of EqIA involves screening to identify the potentially beneficial and adverse impacts of the plan or policies on each of the specific equality target groups and identifies any gaps in knowledge. If any potentially significant adverse effects are identified and/or if the impact is not intended and/or illegal, then a full stage two assessment should be carried out. The second stage of the process forms a more detailed assessment focusing on the significant negative impacts and identifying possible mitigation scenarios. Consultation with stakeholders and members of the equality target groups should be undertaken during this phase.

6.12. An EqIA Screening Report will be included as an Appendix to the next SA Report on Local Plan Issues and Options to be published for Regulation 18 consultation later in 2024.

HABITATS REGULATIONS ASSESSMENT (APPROPRIATE ASSESSMENT)

What is Appropriate Assessment?

6.13. The requirement for Appropriate Assessment (AA) of plans or projects originated from EU Directive 92/43/EEC on the 'Conservation of Natural Habitats and of Wild Fauna and Flora' (the Habitats Directive). The Habitats Directive established a Europe wide network of sites known as Natura 2000, which provides for the protection of sites that are of exceptional importance for rare, endangered or vulnerable natural habitats and species within the European Union. These sites, also referred to as 'European sites', consist of Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Offshore Marine Site (OMS). Ramsar sites (wetlands of international importance) are included as if they are fully designated European Sites for the purpose of considering development proposals that may affect them.

6.14. Although BREXIT has taken place, the Habitats Directive was implemented in the UK through the Conservation (Natural Habitats &c) Regulations 1994 which is still in force at the time of writing. The Regulations are responsible for safeguarding designated European sites and therefore protecting the habitats and species listed in the Annexes of the Directive.

6.15. 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 section (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.

6.16. The Habitats Regulations Screening Report will be included as an Appendix. to the next SA Report on Local Plan Issues and Options to be published for Regulation 18 consultation later in 2024 The purpose of the Screening Report will be to assess whether any of the emerging preferred options are likely to have significant effects, either alone or in combination with other plans or projects, on the protection or integrity of any designated European site within or adjacent to the Borough.



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