

London Borough of Sutton

Environment, Housing and Regeneration Directorate

Economic Development, Planning and Sustainability



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Sadiq Khan
Mayor of London
New London Plan
London Plan Team
GLA City Hall
London SE1 2AA

Dear Mr Khan,

Thank you for the opportunity to comment on your Draft London Plan. There is much that is good and to welcome in the Plan.

Sutton particularly welcomes its identification as an Opportunity Area and the intention to deliver the Tram Triangle, as well as recognition of the London Cancer Hub's potential contribution to the London and UK economy.

Your determination to deliver affordable housing, protect and enhance green space, your commitment to sustainable development and improving air quality are all welcomed and supported.

We are also supportive of your ambition to meet the housing need across London. However, we have significant reservations about the way that housing is proposed to be delivered, specifically in relation to small sites, believing the underlying methodology and assumptions to be flawed, and the policy ultimately undeliverable, thereby rendering the Plan unsound.

In addition to the flawed methodology, we consider the aims of the policy as misdirected and will negatively impact the London offer.

By directing significant intensification of small sites to outer London boroughs, the Plan risks losing the diverse housing offer that suburban areas contribute to. Small sites will fail to deliver anything like the quantity of affordable units that Londoners require, and push households, especially families, out of London altogether as they seek areas that still offer the quality of life they aspire to.

It is inequitable that outer London boroughs should be required to forgo all the characteristics that make them attractive and desirable places to live in order to make up for the failure of policies in inner London to provide sufficient affordable homes for the average Londoner. We should not look to concrete over suburbia whilst there are properties in central London lying empty as assets for overseas investors, or second homes for

millionaires, or luxury stopovers for rich business travellers. We have already seen an influx into our borough of people displaced from central London due to the cost of accommodation. This policy will only consolidate that exodus, leaving central London not just the preserve of the wealthy but also empty, sterile and unattractive.

The policy ignores the need for family homes, which further adds to the lack of housing diversity.

Sutton has just approved its new Local Plan, which seeks to deliver a significant increase in quality, affordable housing to help meet London's housing need. It has sought to do that in a way that preserves the character of the borough, and has resident support. It is a fine balance, but one that is deliverable based on sound evidence, and it was supported by the Planning Inspector at Examination. The London Plan's policy in respect of housing delivery in outer London boroughs rides roughshod over our Plan, and negates many of the policies we sought to strengthen, such as resisting backgarden development and limiting conversions to reduce the loss of family homes. It demonstrates a lack of consultation and collaboration with boroughs which previously had been welcomed.

We hope that you will reconsider these policies in light of our detailed submission and evidence, so that we can work collaboratively to ensure that London remains the attractive, affordable and diverse city we all aspire to.

Yours sincerely,



Councillor Jayne McCoy
Chair of the Housing, Economy and Business Committee
London Borough of Sutton

*Chief Executive – **Niall Bolger***
*Strategic Director – **Mary Morrissey***

LONDON BOROUGH OF SUTTON REPRESENTATIONS **ON THE DRAFT LONDON PLAN**

Chapter 1: Planning London's Future

Policies GG1 to GG6

No comment.

Chapter 2: Spatial Development Policies

Policy SD1 - Opportunity Areas

SUPPORT. The London Borough of Sutton supports *Policy SD1 - Opportunity Areas*, welcomes the identification of Sutton Town Centre as an opportunity area and looks forward to working with The Mayor to deliver the residential units, employment opportunities, social infrastructure and the necessary transport infrastructure.

Figure 2.12 - Tram Triangle identifies the Sutton Town Centre Opportunity Area as capable of delivering 5,000 new homes and 3,500 new jobs. When the new homes figure is broken down over the Draft London Plan plan period, it gives an annual dwelling requirement in Sutton Town Centre of 227 new homes. This is precisely the figure planned for and allocated for in Sutton Town Centre in the council's recently adopted Local Plan.

With regard to employment forecasts, the council is currently allocating approximately 1,850 jobs (excluding retail jobs) in Sutton Town Centre but of more relevance is the fact that the Local Plan has an "office override" mechanism in its policies which allows proposals for new offices to take precedence over an adopted allocation (i.e. it would 'override the allocation), thereby allowing small and medium-sized businesses to locate their headquarters in Sutton without being corralled into unwanted sites as a result of inflexible allocations.

However, to accommodate this level of growth, social and, particularly, transport infrastructure is essential. Therefore, the council welcomes the reference in *Paragraph 2.1.68* highlighting that "the proposal to extend the Tram to Sutton Town Centre, and potentially beyond to the proposed London Cancer Hub, as this would improve public transport accessibility to the town centre, St Helier Hospital and support the delivery of at least 10,000 homes." This quantum of new homes will be a challenge for the borough and the wider sub-region but with the allocations in Sutton Town Centre, the potential redevelopment of social housing estates around Sutton Town Centre and the planned redevelopment of Morden town centre in the London Borough of Merton, the council believes this target could be achieved provided that the Tram extension is brought forward to unlock development.

Policies SD2-SD5

No comment

Policies SD6 - Town Centres

SUPPORT. The London Borough of Sutton supports *Policy SD6 - Town Centres* as it aligns with the town centre policies in the council's recently adopted Local Plan. The council's policies are aimed at making each of the borough's town centres distinctive, by building on their individual strengths and identity.

In terms of development, the council's policies direct 90% of the new housing development to town and district centres (most notably Sutton Town Centre - 55%, Hackbridge - 15% and Wallington - 10%). The Local Plan also allocates sites for additional retail and office development but also recognises that retail habits and, as a result, town centres are changing and so the Local Plan has relaxed retail requirements in secondary shopping frontages in order to encourage a wider range of town centre uses.

Policy SD7 - Town Centre Network

SUPPORT WITH CONDITIONS. The London Borough of Sutton broadly supports *Policy SD7 -Town Centre Network* and, by extension, the classifications in *Annex 1*. The council welcomes the classification of Sutton as a Metropolitan Centre, which the council is positioning as a complementary centre to Kingston and Croydon, and it particularly welcomes the classification of Sutton Town Centre as a night-time economy destination and as a centre with medium growth potential from commercial and office development.

With regard to District Centres, however, the council considers Carshalton Village and Cheam Village should both be designated NT3 (areas with a night-time economy of more than local significance). The council considers that both centres "punch above their weight" in terms of the night-time economy: Carshalton Village in terms of an array of historic pubs, which draws customers from Croydon, Mitcham and Sutton; and Cheam Village in terms of its choice of restaurants, which draws diners from beyond the Greater London boundary.

Policy SD8 - Town Centres: Development Principles and Development Plan Documents

OBSERVATION. The London Borough of Sutton supports *Policy SD8 - Town Centres: Development Principles and Development Plan Documents* but considers it an unnecessary policy. Much of what is stated in the policy is basic, sound planning or repeated from national policy and guidance. The Council considers that these are not strategic matters which are best devolved to the local level which has a better understanding of the context to deal with detailed local matters (similar comments apply to Policy SD9).

Policy SD9 - Town Centres: Local Partnerships and Implementation

OBSERVATION. The London Borough of Sutton supports *Policy SD9 - Town Centres: Local Partnerships and Implementation* but considers it an unnecessary policy. Much of what is stated in the policy is basic, sound planning or repeated from national policy or guidance. The Council considers that these are not strategic matters which are best devolved to the local level which has a better understanding of the context to deal with detailed local matters. (similar comments apply to Policy SD8).

Policy SD10 - Strategic and Local Regeneration

OBJECT - UNSOUND - NOT JUSTIFIED. The London Borough of Sutton supports the principle of council intervention to reduce inequalities and tackle barriers that affect people's lives and it welcomes an approach which seeks to align local regeneration and investment plans and priorities with those of the GLA. However, the council considers that *Policy SD10 - Strategic and Local Regeneration*, specifically policy SD10 A(1), is founded on evidence that is too high level and the aims of the policy would be better carried out by individual boroughs. The policy is based on the accompanying *Figure 2.19* which identifies the strategic areas for regeneration based on the 20% most deprived lower super output areas in England but this broadbrush approach fails to take into account the individual characteristics of the deprived areas. For instance, the Roundshaw Estate is identified for regeneration but the estate has recently been redeveloped and its deprivation scores arise from low attainment in terms of education and adult skills, which are not directly planning matters. Similarly, the St Helier Estate is identified for regeneration but it is an estate providing good quality social housing and relatively cheap market housing (not flats) and its low scores also arise from poor education and adult skills levels. Areas for regeneration should be a borough matter where the individual circumstances of each area are known and not based on an unrefined deprivation matrix.

Furthermore policy A (1) requires boroughs to identify in their Local Plans Strategic Areas for Regeneration using Figure 2.19. Having said this, the London Borough of Sutton agrees with the aims of policies A (2), B and C. The council considers that policy A (1) is at variance with these, and contradicts rather than complements them. This is the reason for our objection. If this policy were amended to remove that contradiction then the council would support it.

Chapter 3: Design

Policy D1: London's Form and Characteristics

OBSERVATION. The London Borough of Sutton is concerned that Policy D1 pays insufficient regard to local character and townscape. The council is supportive of sustainable growth but considers that new development should successfully integrate within the townscape, particularly when considering small sites. In addition, the council considers that much of the policy includes detailed design matters which are not strategic issues and should be addressed at a local level.

Policy D2: Delivering Good Design

SUPPORT WITH CONDITIONS. The London Borough of Sutton welcomes the objective of D2H which seeks to ensure the design quality of development is retained through to completion. The council is particularly concerned to ensure design quality is maintained in schemes where exceptional design has been a key factor in approving development schemes.

However, the council considers that Policy D2 should pay greater regard to local character and townscape in determining capacity for growth. The council is supportive of sustainable

growth but considers that new development should successfully integrate within the townscape, particularly when considering small sites.

Policy D3: Inclusive Design

OBSERVATION. The London Borough of Sutton broadly supports the approach to inclusive design. Whilst the council commends raising the awareness of developers and decision makers to matters concerning fire safety, Policy D3 should not duplicate other regulation.

Policy D4: Housing Quality and Standards

OBJECT - UNSOUND - NOT CONSISTENT WITH NATIONAL POLICY. The London Borough of Sutton considers that Policy D4 has removed an important element of the previous London Plan Policy 3.5 that included a presumption against back garden land development. The council considers this should be reinstated. Furthermore, given that Paragraph 53 of the National Planning Policy Framework allows local planning authorities to have policies resisting the inappropriate development of residential gardens, this policy is contrary to national planning policy as it undermines boroughs' ability to plan against harm to their local areas. The Inspectors report into the Examination of Suttons Local Plan found favour with the persuasive evidence of immediate and cumulative harm to the green character of the Boroughs suburban areas, by finding the Council's renewed policy commitment to resist inappropriate back garden land development as being sound and in line with the NPPF and the current London Plan.

Policy D5: Accessible Housing

SUPPORT. The London Borough of Sutton supports Policy D5, which is consistent with Policy 9 of the Sutton Local Plan (2018).

Policy D6: Optimising Density

OBSERVATION. Whilst the London Borough of Sutton supports the design-led approach to bringing forward development sites, it is concerned that the policy expects all new development to achieve higher densities, which seems to contradict the approach of optimising density on a site as it has little regard for the role of exemplar design. Taking the local context and character into account, as required by other draft policies, may not lead to higher density development being the optimal solution. This has the potential to cause significant harm to the character of an area and is not consistent with Paragraph 58 of the National Planning Policy Framework.

Policy D7: Public Realm

OBSERVATION. The London Borough of Sutton broadly supports *Policy D7 Public Realm*, however, the council considers that much of the policy includes detail design matters which are not strategic issues and should be addressed at a local level.

Policy D8: Tall Buildings

SUPPORT WITH CONDITIONS. The London Borough of Sutton broadly supports *Policy D8 Tall Buildings*, as it aligns with policies in the council's recently adopted Local Plan, which define tall buildings in the Sutton context and identify a number of 'Areas of Taller Building Potential' in sustainable town centre locations. The council welcomes impact C 1 (d) in the

policy which references the significance of heritage assets, and the avoidance of harm to these, because Sutton is the first of two London boroughs to have a Heritage Action Zone. However, the council considers that much of the policy includes detailed design matters which are not strategic issues and should be addressed at a local level.

Policy D9: Basement Development

SUPPORT. The London Borough of Sutton welcomes *Policy D9 Basement development*, which supports a borough level approach.

Policy D10: Safety, Security and Resilience to Emergency

SUPPORT. The London Borough of Sutton supports the broad approach to safety, security and resilience.

Policy D11: Fire Safety

SUPPORT. The London Borough of Sutton welcomes raising the awareness of fire safety matters but considers that the London Plan should make clear the roles and responsibilities of planning and other regulatory regimes. Issues that are pertinent to planning decisions include site access and exterior materials and wider consideration of fire safety could be addressed in supplementary guidance or by other legislation.

Policy D12: Agent of Change and Policy D13: Noise

OBSERVATION. The London Borough of Sutton broadly supports the approach to noise. Given that *Policy D12 Agent of Change* principally relates to noise, the council considers that there is scope to amalgamate policies D12 and D13 and streamline to avoid repetition of national policy and guidance. The council considers that clarification should be provided regarding 'Tranquil Areas' which are referred to at paragraph 3.13.6 but are not addressed within the policy.

Chapter 4: Housing

Policy H1: Housing Supply and H2: Small Sites

OBJECTION - UNSOUND, NOT CONSISTENT WITH NATIONAL POLICY. The London Borough of Sutton recognises the pressing need for new homes in London and supports the principle of delivering dwellings above and beyond the current London Plan targets. Indeed the London Borough of Sutton's new Local Plan (adopted February 2018) sets a new housing target for the borough of 427 net additional dwellings per annum (dpa), an increase of 18% above the current London Plan target for the borough of 363 dpa. However, the council considers the Mayor's new draft target of 939 dpa and the methodology used to calculate the small site estimates is not justified and therefore unsound and has resulted in unrealistic and undeliverable targets. As such the council objects to Policy H1 and H2.

Through participation in the London-wide SHLAA, officers assessed sites of 0.25 ha or larger. Sutton considers that this exercise resulted in realistic assumptions about large site capacity and the delivery of 2,010 net additional dwellings in Sutton over the lifetime of the London Plan. Importantly, and as set out in paragraph 4.1.7 of the draft London Plan, this

exercise was undertaken by officers in partnership with the GLA, an approach that Sutton fully supports. However, the council is very concerned that the GLA has changed the methodology used to calculate small site targets without any consultation with boroughs prior to publication, unlike the partnership approach for calculating large sites. Given the significant and unattainable uplift suggested through Sutton's small sites target, (representing 79% of the borough's overall housing provision), the council considers this approach is inappropriate, flawed and not in the spirit of collaborative working with Borough(s).

The reasons for the London Borough of Sutton's objections to Policy H1 and H2 are set out below.

Flawed Methodology

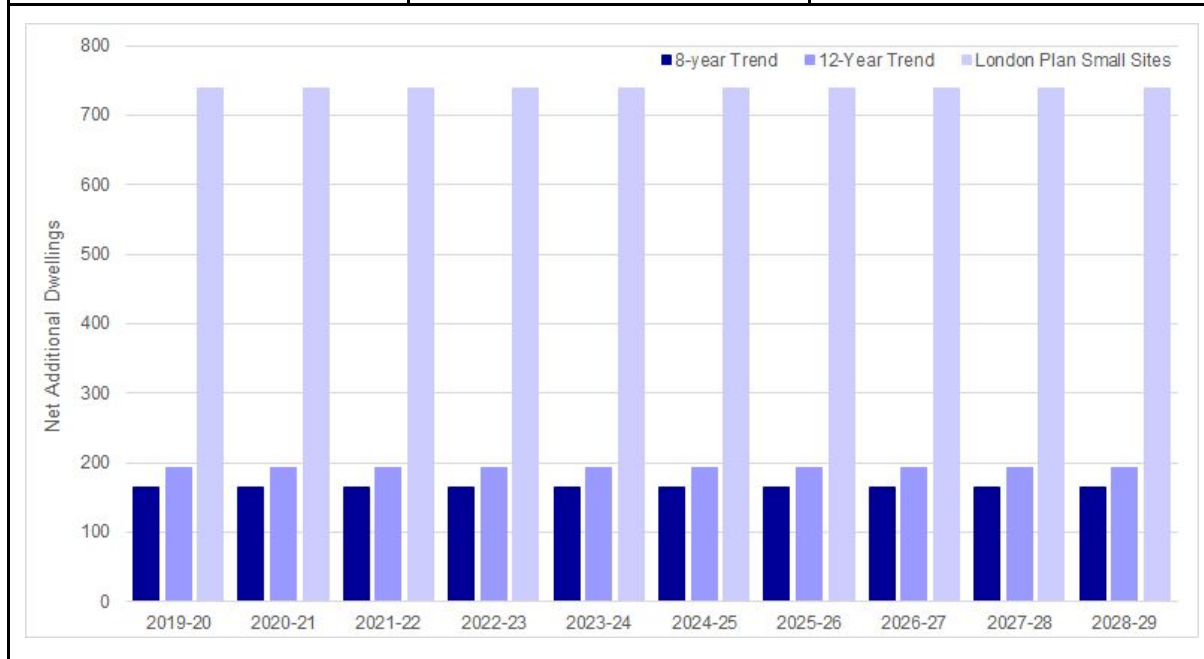
The council strongly objects to the proposed policy direction for sites of less than 0.25ha (or sites for 1-25 homes) and the subsequent small sites target based on the 2017 GLA SHLAA methodology. The policy approach results in a small site target for the London Borough of Sutton of 738 dpa or 7,380 over the London Plan period. This represents a 218% increase over the historic 12-year completions trend and a 463% increase over the 8-year completions trend. The London Borough of Sutton considers the methodology used to calculate the 738 dpa in the draft London Plan is flawed.

The methodology assumes that 1% of the existing housing stock will increase in density in areas with PTALs 3-6 or are within 800m of a tube or rail station or town centre boundary (36 new homes for every 1,000 Detached / Semi-Detached and 1,000 terrace houses). It is based on a general assumption that all rail stations are located close to thriving centres, whereas many in Sutton are located in predominantly suburban areas, which have few services per hour compared to the higher frequency of services around tube stations and larger railway stations in town and district centres. The assumptions around the relative densities that could be achieved around a tube station or larger railway stations cannot be realistically applied to areas which have a suburban context. The 1% assumption is arbitrary, with no evidence presented by the Mayor to justify it, other than it is considered 'reasonable'. There is no impact analysis for suburban London and it is divorced from historic delivery. As a result, it does not offer a sound basis on which to plan for housing supply. Furthermore, the result of this theoretical model is that, if the borough is largely suburban in character, it will receive a higher housing target even though past trends indicate it has never achieved these levels of delivery on small sites. Table 1 below sets out Sutton's historic small site delivery rates (as set out in the 2017 GLA SHLAA) and compares this to the new small sites target.

Table 1 : Small Site Completions in LB Sutton and London Plan Projections

Time Period	Total Small Site Completions (Net)	Annual Average for the Period (Net)
2008-09 to 2015-16 (8-Years)	1,310	164 dpa
2004-05 to 2015-16 (12-years)	2,320	193 dpa
New London Plan Small Site	7,380	738 dpa

Target		
Increase from 8-Year Trend	+6,070 (+463%)	+574 dpa (+350%)
Increase from 12-year Trend	+5,060 (+218%)	+545 dpa (+282%)



Source: Figure 6.1 to 6.4, London Strategic Housing Land Availability Assessment (2017)

Figure 1 shows that the average delivery in the London Borough of Sutton between 2008-09 to 2015-16 was 164 dpa, meaning that delivery from this source would need to increase by 574 dpa or 350% to meet the draft London Plan figure. If the 12-year trend data is used the increase required is 545 dpa or 282%. The NPPF states that “*Local planning authorities may make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends, and should not include residential gardens*”. The London Borough of Sutton considers that the historic delivery rate in the borough, as set out in Figure 1 above, provides compelling evidence that the new small site estimate of 738 dpa is not realistic and will not be delivered. As such Policies H1 and H2 are not consistent with national policy.

The council does not consider the draft policies in the London Plan aimed at helping to facilitate the delivery of small sites will achieve that aim, given the huge gap between proposed targets and historic delivery. The council also considers that these policies will result in unprecedented harm to the character of high quality suburban areas that would outweigh the benefit of increased housing delivery. For example, the methodology makes no allowance for local designations such as ‘Areas of Special Local Character’ (ALSC). These areas would be significantly and irrevocably damaged by the presumption in favour of small site delivery advocated in Policy H2. Other mechanisms within Policy H2 to facilitate small sites development include allocating sites through development plans, listing sites on

brownfield registers and granting permission in principle. However, these tools are already available to local authorities, so the policy merely replicates the current situation nationally.

In summary, the London Borough of Sutton is of the unequivocal view that the housing target set out in Policy H1 and H2 will not be delivered and therefore that it will never be able to demonstrate a Five-Year Supply of housing, leading to the inevitable ‘planning-by-appeal’.

Viability of Small Site Delivery

The London Borough of Sutton believes that the small site development envisaged by the draft London Plan is not viable in the borough.

Firstly, as part of the Local Plan preparation, the London Borough of Sutton considered the viability of small sites through a thorough examination of its ‘Areas of Potential Intensification’ around town centres to identify the capacity for small-site development. It was concluded that, although there was scope for development, it was limited. Back gardens were often “landlocked” and therefore there were likely to be ransom strips which would render back garden land development unviable. The Councils evidence to the Local Plan examination is that demolition and complete redevelopment of houses is unviable because much of the inter-war development was on relatively small plots and, given the surrounding storey heights, the need for parking and amenity space, the amount of new floorspace resulting from redevelopment would not be financially viable.

Secondly, the draft London Plan appears to have derived this policy from the study “Transforming Suburbia: Superbia Semi Permissive”¹. However, the London Borough of Sutton have major reservations regarding the viability calculations and their relevance to the borough. The consultants who produced this report overestimated the development income resulting from a suburban redevelopment by over 100% and that a true reflection of the development income would render the example scheme unviable. Figure 2 shows the example scheme using actual land registry sales data in Sutton would have a shortfall of £811,758².

Table 2: “Superbia” in the London Borough of Sutton

Costs	Price
Development Income	
Two garden flats @1200 sqft	£ 555,106
Two duplexes @1400 sqft	£ 649,474
Gross Sales Value	£ 1,204,580
Sales, marketing and legal costs @2.5%	£ 30,115
Net Income	£ 1,174,466
Land Cost	
Two semi-detached houses @1450 sqft	£ 1,060,224
Legal costs assuming deferred payment and no SDLT	£ 15,000
Total	£ 1,075,224
Planning Costs	
Affordable housing contribution @£20,000 per additional home	£ 40,000
Car Club contribution	£ 5,000

¹ HTA, PTE, Savills, NLP, 2015 (http://www.pollardthomasedwards.co.uk/download/supurbia-semipermissive_v5_LR.pdf)

² Based on average sale price of a flat and semi-detached property in Sutton, Land Registry October 2017

Professional fees	£ 10,000
Total	£ 55,000
Works Costs	
Demolition and enabling works	£ 25,000
Construction @ £1500 per sqm	£ 725,000
Fees and miscellaneous costs @10%	£ 75,000
Finance cost @6.5% based on 15 month cashflow incl void period	£ 31,000
Total	£ 856,000
Outcome	
Development Income	£ 1,174,466
Combined development costs	£ 1,986,224
Gross surplus	- £ 811,758

In light of the problems with the viability analysis in the “Transforming Suburbia” report, officers consider the viability of small site delivery in the London Plan Viability Study lacks proper methodology and is based on weak evidence. This is not sound for Plan making and further analysis should have been undertaken before committing to this methodology.

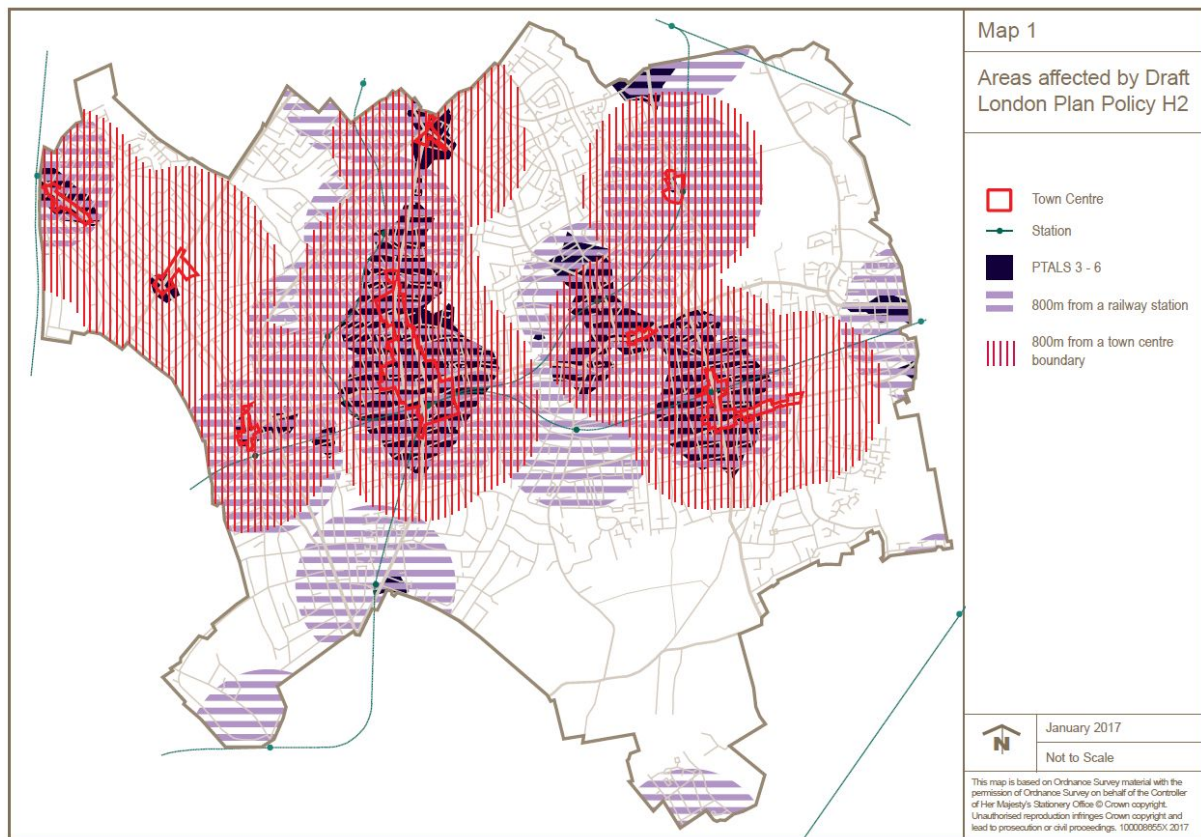
Spatial Distribution

Policy H2 would apply small site proposals within PTALs 3-6 or within 800m of a Tube Station, rail station or town centre boundary. In Sutton this would cover almost the entire borough, only excluding some Green Belt and Strategic Industrial Locations (See Map 1). This approach has a disproportionate impact in outer suburban boroughs such as Sutton and would destroy areas of high quality suburban housing.

At the recent Sutton Local Plan examination, the Planning Inspector agreed with the council that the London Plan areas for intensification around town centres should not be applied in Sutton. The current draft London Plan has a policy of intensification within 800 metres of a town centre boundary. The council argued that:

- (i) The borough’s town centres are mainly linear in nature;
- (ii) They have very little or no hinterland of poor quality housing stock to improve; and
- (ii) In many cases, good quality suburban housing often abuts the centre.

The Inspector agreed with the council that a 400-metre intensification zone around town centres was appropriate for the borough.



Secondly, officers are concerned that the Mayor considers railway stations are equivalent in terms of frequency to tube stations. Officers consider that Sutton's Zone 5 stations, such as Carshalton (4 trains per hour), West Sutton (2 trains per hour) and Belmont (1 train per hour currently), are in no way equivalent in terms of frequency to Zone 5 tube stations, such as Becontree (District), Rayners Lane (Piccadilly), Northolt (Central) and Harrow-on-the-Hill (Metropolitan). Given the poor public transport options available to residents (no tube stations, no London Overground stations and no Tramlink), the densification of the suburbs will inevitably put a huge pressure on the boroughs road network.

Finally, the small sites estimate equates to 79% of Sutton's overall target 939 dpa. This is the highest proportion in London (See Table 3). Given that the small site distribution covers almost all of the housing stock in Sutton, the policy approach of H2 makes it impossible to properly plan and manage future housing supply, and any associated infrastructure such as schools and health centres, as the vast majority of housing would be coming forward in unknown locations. Placing such a huge reliance on small windfall sites, particularly given the gulf between historic delivery rates and the London Plan target, is neither appropriate nor justified.

Table 3: Adopted London Plan Target compared to Draft Targets

Borough	2016 Annual New Homes Target	2017 Draft Annual New Homes Target	Percentage Change	Small Site Target	% of overall Target
Camden	889	1,086	+22%	376	35%
City of London	141	146	+4%	74	51%
Greenwich	2,685	3,204	+19%	681	21%
Hackney	1,599	1,330	-17%	660	50%
Hammersmith & Fulham	1,031	1,648	+60%	298	18%
Islington	1,264	775	-39%	484	63%
Kensington & Chelsea	733	488	-33%	169	35%
Lambeth	1,559	1,589	+2%	654	41%
Lewisham	1,385	2,117	+53%	829	39%
Southwark	2,736	2,554	-7%	800	31%
Tower Hamlets	3,931	3,511	-11%	566	16%
Wandsworth	1,812	2,310	+27%	774	34%
Westminster	1,068	1,010	-5%	529	52%
INNER LONDON TOTALS	20,833	21,768	+4%	6,894	32%
Barking & Dagenham	1,236	2,264	+83%	519	23%
Barnet	2,349	3,134	+33%	1,204	38%
Bexley	446	1,245	+179%	865	70%
Brent	1,525	2,915	+91%	1,023	35%
Bromley	641	1,424	+122%	1,029	72%
Croydon	1,435	2,949	+106%	1,511	51%
Ealing	1,297	2,807	+116%	1,074	38%
Enfield	798	1,876	+135%	983	52%
Haringey	1,502	1,958	+30%	626	32%
Harrow	593	1,392	+135%	965	70%
Havering	1,170	1,875	+60%	904	48%
Hillingdon	559	1,553	+178%	765	49%
Hounslow	822	2,182	+165%	680	31%
Kingston upon Thames	643	1,364	+112%	625	46%
Merton	411	1,328	+223%	671	51%
Newham	1,994	3,850	+93%	950	25%
Redbridge	1,123	1,979	+76%	938	47%
Richmond upon Thames	315	811	+157%	634	78%
Sutton	363	939	+159%	738	79%
Waltham Forest	862	1,794	+108%	889	50%
OUTER LONDON TOTALS	20,084	39,639	+97%	17,593	44%
London Legacy Dev Corp	1,471	2,161	+47%	80	4%
Old Oak & Park Royal Dev Corp	0	1,367	n/a	6	0.4%
GREATER LONDON TOTALS	61,750	83,175	+35%	24,573	30%

Impact on Affordable Housing

The London Borough of Sutton is concerned that the over reliance on small sites in Sutton will have an adverse impact on affordable housing delivery. Policy H5 sets a strategic target for 50% of all new homes in London to be affordable. However, the majority of future

delivery in Sutton would fall below the affordable housing threshold. Even though the draft London Plan has a wider definition of “small sites” (up to 25 dwellings), the past completions rates in Sutton show that very few schemes of 10-25 units have been delivered so the amount of affordable housing from these schemes is small. Table 4 below shows that over the last 8 years only an average of 46 units are completed on schemes of this size, equating to less than 5% of the draft London Plan target for the Sutton.

Whilst Policy H2 (Clause H) addresses affordable housing contributions from sites delivering 10 or fewer units the London Borough of Sutton considers it is weak as it only “encourages” and not “requires”. Sutton’s Local Plan (adopted February 2018) did include a draft policy to secure affordable housing on sites with fewer than 10 units but this was deleted by the Inspector due to a lack of local evidence. As such the council could only expect to secure affordable housing on 21% of its draft London Plan target.

Table 4: Net Additional Dwellings Completed in LB Sutton on Schemes of 10-25 Units

FY Year	Net Additional Dwellings from schemes of 10-25 units
2009-10	48
2010-11	56
2011-12	56
2012-13	44
2013-14	20
2014-15	12
2015-16	65
2016-17	66
Total	367
Annual Average	46

Source: London Borough of Sutton Authority Monitoring Reports

Housing Sizes

The London Borough of Sutton considers that Policy H2 would have a detrimental impact on family homes in the borough, both in terms of the loss of existing houses and the future provision of 3 bedroom or more dwellings. This approach is contrary to the London Borough of Sutton’s own evidence base (Sutton’s Strategic Housing Market Assessment/SHMA) that informed the preparation of the adopted Local Plan (2018).

The Sutton SHMA identified a need for 50% of future market and affordable dwellings to be family housing (3+ bedrooms) and this is now a requirement in Policy 10 of the adopted Local Plan. The London Borough of Sutton considers that a local SHMA is far more robust than one carried out at a pan-London level as discussed below (under comments on Policy H12). The implementation of Policy H2 could only be achieved by the delivery of 1- and 2-bed flats. The lack of family homes being delivered would be compounded by the fact that these 1- and 2-bed flats would be delivered through the sub-conversions or demolition of family homes and by infill within the curtilage of a house. As such, the policy approach would fail to meet the identified need for Sutton at the same time as reducing the existing stock of family homes. Therefore Policy H2 is not effective in this respect as it will fail to deliver Sutton’s identified need.

Negative Impacts of the draft London Plan target

Notwithstanding the London Borough of Sutton's view that the housing targets of Policy H1 and H2 will not be met, the council considers its implementation would have significantly negative impacts on the borough:

- A detrimental change in the character of the borough with high density flatted development of varying heights in the middle of high quality suburban housing.
- A greater number of families living in small units due to the loss of existing family homes and the non-delivery of new family homes
- The loss of back garden land, with the consequent harm to biodiversity, flooding and loss of mature trees through infill development within the curtilage of a house.
- No noticeable increase in the delivery of affordable housing. As most of the development is on small sites, the majority of this development will fall below the threshold for affordable housing in the Draft London Plan.
- Pressure for development on Public Open Space and Metropolitan Open Land to offset the inevitable under delivery of small sites.
- A need for more social and physical infrastructure. The London Borough of Sutton estimate this will result in a need for a further 1-2 secondary schools, 2-3 primary schools and 3+ health centres. As these are not provided by the private sector, it is likely that council-owned land, ie parks, would be lost for their development. This loss of parks will come at a time when there are more families in smaller units and so the importance of parks and outdoor recreational space is heightened. Furthermore, since 80% of the housing target is undefined in terms of location, the council will be unable to plan for these services before the need arises.
- Local planning designations, most notably the Areas of Special Local Character designation and Areas of Taller Building Potential, will carry little or no weight.
- The Local Plan policies of selective intensification in the most suitable and accessible areas, which have significant local support after extensive consultations, will cease to apply.

Summary

The London Borough of Sutton is of the view that the Mayor's draft London Plan would create a planning framework that means any future Local Plan prepared for the London Borough of Sutton would not be a positive plan for the future of the borough but one of 'managed decline'. As such the London Borough of Sutton objects to Policy H1 and H2 because the housing target of 939dpa is neither justified nor effective due to the small site estimate, which is divorced from historic trends and predicated on an unevidenced theoretical methodology.

The London Borough of Sutton urges the Mayor to reconsider the approach to small sites and recommends that the draft London Plan methodology uses Approach 2 in the London SHLAA (12-year trend for small sites) which is more realistic about small site delivery rates. The council recommends that the adopted Sutton Local Plan housing target of 427 dpa is identified in the London Plan as Sutton's housing target for the period 2019-20 to 2028-29.

Policy H3: Monitoring Housing Targets

SUPPORT WITH CONDITIONS. Notwithstanding the London Borough of Sutton's objections to Policy H1 and H2, the council supports in principle the new policy relating to the

monitoring of targets. However, Policy H3 and the supporting text does not provide adequate guidance to boroughs on how a five-year housing land supply could be calculated, taking into account the significant uplift in small site targets. Clarification is required on whether boroughs will need to demonstrate delivery against both the small site target and the overall target. Whilst paragraph 4.3.3 acknowledges that the increased small site targets will take time to be delivered it is considered inappropriate and unrealistic for boroughs to be monitored against these targets until there is more certainty that housing delivery will occur along the lines envisaged in the Mayor's SHLAA (2017).

Policy H4 - Meanwhile Use

SUPPORT. The London Borough of Sutton supports the provisions of Policy H4 and considers it is broadly consistent with the council's current approach of developing modular housing for council owned land.

The London Borough of Sutton considers that the supporting text of Policy H5 should clarify whether housing delivered from this source can count towards the housing target for the borough.

Policy H5: Delivering Affordable Housing

SUPPORT. The London Borough of Sutton supports the overall strategic target that 50% of all homes in London should be affordable. However, given the huge proportion of sites that are expected to be delivered on sites below the affordable housing threshold, the council considers the policy approach of "encouraging" should be strengthened, particularly in light of the fact that Sutton's draft policy on affordable housing on small sites was deleted during the Local Plan EiP. However, whilst the London Borough of Sutton supports affordable housing contributions on small sites there is a risk that the approach could negatively affect scheme viability and, accordingly, the overall delivery of small housing developments in London.

The London Borough of Sutton notes Policy H5 expects grant funding to be used to increase the level of affordable housing above the threshold level. This is critical considering schemes will need to demonstrate that they have sought to increase the level of affordable housing beyond the level that would otherwise be provided. The London Borough of Sutton considers that the supporting text of Policy H5 should include clear references to the levels of funding likely to be made available.

Policy H6: Threshold Approach to Applications

OBSERVATION. The London Borough of Sutton considers that there is a significant degree of uncertainty whether the fast-track route will incentivise developers to avoid the viability-tested route given that the industry's arguments around viability assessments is well rehearsed. It is likely that land traders, as opposed to actual developers, will still favour the viability route over the threshold approach.

The London Borough of Sutton recommends that Clause D of Policy H6 should make references to the need for details of the Early Stage Review to be set out in a S106 agreement.

Policy H7: Affordable Housing Tenure

SUPPORT WITH CONDITIONS. The London Borough of Sutton's adopted Local Plan sets an affordable housing tenure split of 75%/25% between social/affordable rent and immediate/shared ownership products. Draft London Plan Policy H7 sets a split of 30% social/affordable rent, 30% immediate rent and 40% to be determined at a borough level. The London Borough of Sutton notes that paragraph 4.7.2 would support the council allocating this entire 40% to social/affordable rent products to achieve broad consistency with the Sutton Local Plan. As such the council supports Policy H7.

However, the council is concerned that it may not be possible to deliver the level of affordable housing set out in Policy H5 with grant if national funding is focussed on intermediate products instead of affordable rent/social rent.

Policy H8: Monitoring of Affordable Housing

SUPPORT. The London Borough of Sutton supports Policy H8.

Policy H9: Vacant Building Credits

SUPPORT. The London Borough of Sutton considers the Policy H9 on vacant building credits provides greater clarity on its application in London and the 'London approach' will assist with the delivery of affordable housing.

Policy H10: Redevelopment of Existing Housing and Estate Regeneration

SUPPORT WITH CONDITIONS. The London Borough of Sutton broadly supports Policy H10 for the redevelopment of existing housing and estate regeneration as the policy is safeguarding affordable floorspace and low-rent tenures. However, the council is concerned that the precise stipulations on replacement homes could stifle innovation and high quality design. The council considers that it is far better to allow local solutions to be developed in conjunction with residents.

Policy H11: Ensuring the Best Use of Stock

SUPPORT. The London Borough of Sutton supports Policy H11 and the aim of making the best use of existing housing stock.

Policy H12: Housing Size Mix

OBJECT - UNSOUND - NOT JUSTIFIED. The London Borough of Sutton objects to the Mayor's lack of support for the delivery of three or more bedroom family homes. In the adopted Sutton Local Plan (2018), providing the right type of housing has been an important factor, as well as providing an increased quantity of housing. Consequently, the Local Plan housing policies have been guided by the findings of the council's Strategic Housing Market Assessment (SHMA), which identified needs in particular for 3-bed+ market housing and 1- and 2-bed affordable housing (see Table 5 below). The findings of the study are not surprising as a large amount of 1-bed market housing has been developed as a result of the office-to-residential permitted development rights while the cost of housing generally pushes many young people / families into requiring affordable housing.

Table 5: LB Sutton Strategic Housing Market Assessment Need

Tenure	1-bed	2-bed	3-bed+
Market	5%	17%	39%
Affordable	16%	14%	11%

The results of the Mayor’s SHMA are summarised below in Table 6. The difference is that, as it includes areas of London not noted for family housing, the 3-bed+ market requirement is lower and, given that Sutton is relatively affordable borough compared to other parts of London, the need for small affordable units is higher. However, the London Borough of Sutton contends that the findings of the London-wide SHMA do not negate the findings of the Sutton SHMA and that different locations within the London housing market serve different aspects of the London market. In the case of Sutton, as a result of historical development and current built environment, it is better placed to meet the family housing need than many other areas.

Table 6: GLA Strategic Housing Market Assessment Need

Tenure	1-bed	2-bed	3-bed+
Market	16%	3%	16%
Affordable	39%	13%	13%

The London Borough of Sutton considers that the Mayor’s emphasis on the need for smaller units is too broad. It fails to take into account the requirements of different tenures and fails to consider local factors such as the suitability to provide certain types of housing and affordability. The council refutes the recommendation by the Mayor in the recent Local Plan Main Modifications consultation that any reference to family housing in Sutton Town Centre should be deleted as this would not enable the delivery of mixed and balanced communities.

Policy H13: Build to Rent

SUPPORT WITH CONDITIONS: The London Borough of Sutton supports Part B(1) of Policy H13 that allows boroughs to set their own thresholds to reflect local circumstances. The London Borough of Sutton also supports Part B(6) that would allow residents to secure longer tenancies of 3 or more years and Part B(10) that would ensure residents do not have to pay any upfront costs. However, it is considered that Part B(2), footnote 54, would benefit from greater clarity on the period of time that covenant periods are expected to increase by.

Whilst part B ensures that prospective tenants are in a better / more secure position that they would be renting in the second hand or mainstream market and whilst building for rent may attract additional sources of investment and help accelerate delivery, unless rents are genuinely affordable (and preferably at no more than LHA levels) then its contribution to meeting housing need in London is limited.

Para 4.13.3 states that the affordable housing offer of a Build to Rent development can be entirely at Discounted Market Rent, albeit that the Mayor’s preference is for London Living Rent. However, the council thinks that it’s questionable as to how many households on modest or average incomes could afford to save for a deposit to buy in London, within any reasonable timescale, when they’re paying an intermediate rent (even a London Living Rent) plus service charges assuming they’re renting a flat. If the policy were designed in practice to support ‘Rent to Buy’ it would be more acceptable from a housing needs perspective.

Policy H14: Supported and Specialised Accommodation

SUPPORT. The London Borough of Sutton notes the provisions of Policy H14 and supports the clause that requires supported and specialised accommodation to meet an identified need.

Policy H15: Specialist Older Persons Housing

SUPPORT WITH CONDITIONS. The London Borough of Sutton notes that the benchmarks within Table 4.4 are not targets. This should be confirmed within the supporting text para 4.15.5. The London Borough of Sutton also considers that Policy H15 should recognise the requirement of some boroughs which seek to ensure that proposed care homes are meeting a specific need that is not already catered for within a local authority area.

Policy H15: Specialist older persons housing

OBSERVATION. Policy H15 should provide further clarify regarding the Use Class interpretation for self contained nursing care units.

Policy H16 - Gypsy and Traveller Accommodation

SUPPORT. The London Borough of Sutton supports the Mayor's definition of Gypsy and Travellers, which is consistent with how the Sutton Local Plan has defined Gypsies and Travellers.

H17: Purpose-built Student Accommodation

SUPPORT. The London Borough of Sutton notes Policy H17. Whilst the Sutton SHMA did not identify a need for student accommodation in the borough the council welcomes the contribution it can make to housing targets. The council supports the requirement of Policy H17 to link student accommodation to specific higher education institutions.

H18: Large-scale Purpose-Built Shared Living

OBSERVATION. The London Borough of Sutton considers that Policy H18 should clarify the extent to which large-scale purpose built shared living can make towards borough housing targets.

Chapter 5: Social Infrastructure

Policy S1: Developing London's social infrastructure

SUPPORT. The London Borough of Sutton supports *Policy S1 - Developing London's social infrastructure* as it aligns with the council's policies for social infrastructure, education, health and well-being in its recently adopted Local Plan. The council's policies aim to ensure local needs are met, through the identification of sites for health and education uses, protection of existing social infrastructure, and support for co-location of services.

Policy S2: Health and social care facilities

SUPPORT WITH CONDITIONS. The London Borough of Sutton supports *Policy S2 - Health and social care facilities* as it aligns with policies in the council's recently adopted Local Plan. The council works closely with partners, including the Clinical Commissioning Group, the

Royal Marsden NHS Foundation Trust and the Epsom and St Helier University Hospitals NHS Trust to ensure suitable health infrastructure is in place to meet current and future needs. The council considers that the plan should make clear that where the release of surplus buildings and land are proposed under Policy S2 A5), use for other forms of social infrastructure would need to be addressed before other alternative uses are considered.

Policy S3: Education and childcare facilities

OBSERVATION. The London Borough of Sutton broadly supports *Policy S3 Education and childcare facilities*, and has identified a number of sites for schools in its recently adopted Local Plan to address the need for school places in the borough. However, the council considers that much of the policy includes detailed design matters which are not strategic issues and should be addressed at a local level.

Policy S4: Play and informal recreation

OBSERVATION. The London Borough of Sutton broadly supports *Policy S4 Play and informal recreation*, particularly the inclusion of a benchmark standard for play provision. However, the the council considers that much of the policy includes detailed design matters which are not strategic issues and should be addressed at a local level.

Policy S5: Sports and recreation facilities

SUPPORT. The London Borough of Sutton broadly supports *Policy S5 Sports and recreation facilities*, and would welcome reference to policies for all open space, not only to *Policy G3 Metropolitan Open Land*. In addition, reference to the Walk London Network might better sit with *Policy T2 Healthy Streets* and policies for green infrastructure.

Policy S6: Public toilets

SUPPORT WITH CONDITIONS. The London Borough of Sutton is supportive of greater provision of publicly-accessible toilets in large scale development proposals. The council considers that *Policy S6 Public toilets* should make clear that boroughs determine where this would be sought, to ensure it is appropriate for local circumstances, and that ongoing maintenance costs are met by development.

Policy S7: Burial space

OBSERVATION. The London Borough of Sutton considers that *Policy S7 Burial space* should include the proximity principle to ensure boroughs consider all available options to address local demand for burial space and that this is a prerequisite to wider sub-regional working.

Chapter 6: Economy

Policy E1: Offices

OBJECT - UNSOUND - NOT EFFECTIVE. The London Borough of Sutton does not support Part B of the policy, which states “increases in the current stock of offices should be supported, where there is authoritative, strategic and local evidence of sustained demand for office-based activities, taking into account projected demand for office-based employment and office floorspace to 2041”. The Council submits that this policy is misconceived and

goes against trends which identify that office floorspace has been decimated in south-west London since the introduction of the office to residential permitted development rights, with 29% of office space lost in Sutton Town Centre between May 2013 and January 2017. The council considers that every support should be given to address the loss of employment space. However, this policy appears to fetter it with restrictions based on forecasts. The council would like to see Part B deleted or revised to be made more positive for office developers to develop wherever they choose.

Policies: E2-E4

No comment.

Policy E5: Strategic Industrial Locations

OBJECT - UNSOUND - NOT EFFECTIVE. The London Borough of Sutton does not support Policy E5 in respect of its support for storage and logistics/distribution centres within the Greater London boundary. These uses take up large footprints with few employees and are wasteful in terms of employment density and damaging in terms of their effect on the road network. Given that the Mayor is concerned about the loss of employment land and advocates the intensification of employment land in Policy E4, it is strange that such uses are promoted through Policy E5, and this would also appear inconsistent with Policy E7. The council contends that the policy should be more precise to clarify that the Mayor supports “final-mile distribution centres”, which are an unavoidable use, but does not support the land-hungry, high transport volume uses of regional or national distribution centres within the boundaries of Greater London.

Policy: E6

No comment

Policy E7: Intensification, co-location and substitution of land for industry, logistics and services to support London’s economic function

SUPPORT. The London Borough of Sutton supports Policy E7 with regard to the intensification of industrial areas, subject to its comments to Policy E5, and the council welcomes the overall cautiousness of the policy to co-locating industrial and residential uses. The co-location of industrial and residential uses will only be appropriate to both uses in very few circumstances and must be carefully considered.

Policy E8: Sector growth opportunities and clusters

SUPPORT. The London Borough of Sutton welcomes the support given to specific growth sectors, notably life sciences, and is pleased to see the reference to the London Cancer Hub in the fourth bullet point of Paragraph 6.8.3. However, the council considers there should be an expanded explanation of the London Cancer Hub in Paragraph 6.8.3, particularly in terms of its location to the south of Sutton Town Centre and its co-location potential as the project includes the Institute of Cancer Research and the Royal Marsden Hospital.

Policy E9: Retail, markets and hot-food takeaways

OBSERVATION. The London Borough of Sutton is broadly supportive of Policy E9. However, it considers that this is an example of the Plan overstepping its strategic planning

function and is involved in matters that are for boroughs. As part of its preparation for its Local Plan, the council investigated both obesity levels and the location of hot-food takeaways. In contrast to many boroughs, it found that obesity levels were higher among the borough's adults than its children and that only one hot-food takeaway appeared to be located specifically to attract school children trade. Therefore, in its Local Plan, the council focussed on limiting the excess proliferation of hot-food takeaways in town and local centres. The council is disappointed that a policy carefully constructed to target a specific, local issue is being diluted by a policy for which local circumstances showed there was little evidence.

Policies E10-E11

No comment.

Chapter 7: Heritage and Culture

Policy HC1: Heritage conservation and growth

SUPPORT. The London Borough of Sutton welcomes Policy HC1 *Heritage conservation and growth*, which complements the objectives for the Heritage Action Zone in Sutton.

Policies HC2-HC5

No comment

Policy HC6: Supporting the night-time economy

SUPPORT WITH CONDITIONS. The London Borough of Sutton supports this policy and considers Carshalton Village and Cheam Village should both be designated NT3 (areas with a night-time economy of more than local significance). The council considers that both centres “punch above their weight” in terms of the night-time economy: Carshalton Village in terms of an array of historic pubs, which draws customers from Croydon and Mitcham and Sutton; and Cheam Village in terms of its choice of restaurants, which draws diners from beyond the Greater London boundary.

Policy HC7: Protecting public houses

SUPPORT WITH CONDITIONS. The London Borough of Sutton supports Policy HC7 which is similar to the council's policy in its emerging Local Plan and both policies have been bolstered by recent changes to permitted development rights. However, once again, the council questions whether this is really a strategic matter and suggests the problem of protecting public houses would be better solved at the borough level where local circumstances can be incorporated.

Chapter 8: Green Infrastructure and the Natural Environment

Policy G1: Green Infrastructure

SUPPORT. The London Borough of Sutton supports Policy G1 in ensuring that green infrastructure is considered, designed and planned in a more integrated and holistic way, rather than as an ‘add on’ to development. Updating the SPG for the All London Green Grid is useful to apply broad considerations to local situations.

Policy G2: London's Green Belt

SUPPORT WITH CONDITIONS. The London Borough of Sutton broadly supports Policy G2 but recognises that a broad brush approach may not be applicable in all circumstances, such as those identified in the preparation for Sutton's Local Plan, which identified an area of Green Belt that did not perform its functions and is being de-designated. As such, local evidence based decisions should take precedence on a broad theme of protection and de-designation.

Policy G3: Metropolitan Open Land

SUPPORT WITH CONDITIONS. The London Borough of Sutton supports Policy G3 but recognises that a broad brush approach may not be applicable in all circumstances.

Policy G4: Local Green and Open Space

SUPPORT. The London Borough of Sutton supports Policy G4 and recognises that local assessment is required to determine the extent and value of all proposals for and against green spaces and open spaces.

Policy G5: Urban Greening

SUPPORT. The London Borough of Sutton supports Policy G5 and has already implemented a borough specific Green Space Factor. It is important to recognise that through, for example, flower rich perennial planting, every effort is taken to maximise opportunities for local biodiversity (specifically insects) and not just soil connectivity / aesthetics. This needs to occur through consideration of flowering seasonality, pollen and nectar availability across seasons, pollen and nectar quality and rate of provision / regeneration, provision of suitable vegetation structure for hiding, resting, roosting, overwintering and breeding opportunities and provision of larval host plants and associated ongoing management.

Policy G6: Biodiversity and Access to Nature

SUPPORT WITH CONDITIONS. The London Borough of Sutton supports Policy G6 and acknowledges that each boroughs' Development Plan is key to implementation, under a broad and holistic umbrella, applied across London to provide joined up thinking, in line with the recommendations from the Lawton Review (2010) and the 25 Year Environment Plan (2018).

Under point A, it is agreed that there should be a proportionate approach to site protection through site hierarchy but this should also recognise that sites of lower (or no) designation should receive increased weighting, when evaluated locally, based on the isolation through urban fabric around the site and habitats and species on site. That is, 'islands' of what may be judged from an on site evaluation as of 'lower biodiversity value', may be of greater importance, based on the fact that they are isolated and provide a refuge from urbanisation i.e. consideration of the effects at a local landscape scale. Protection of common species and habitats (cf. house sparrow declines) is as important as protected species as they comprise a higher biomass. Biodiversity Accounting will aid this evaluation.

Under point C, 'Where harm to a SINC...is unavoidable' does not take into account the necessity to test whether there are alternative sites that could be used, before determining that a SINC has to be used. There should be a presumption against development of designated sites unless there is overwhelming evidence that it is required. Only then should the mitigation hierarchy be applied.

Under point C, the mitigation hierarchy of avoid, mitigate and compensate is followed. An additional point should be added before 1) 'avoid'; this should be 'Assess', following the development of Biodiversity Accounting for no net loss and net gain, as espoused under the NPPF (para 109: 'minimising impacts on biodiversity and providing net gains where possible') and recent CIRIA / CIEEM guidance³. In this way, biodiversity loss and gain can be objectively determined and utilised in considerations as to whether 'the benefits of the development proposal clearly outweigh the biodiversity impacts' (policy G6 C3). Biodiversity Accounting should also be utilised at a mandatory level across London, which can be honed by each borough (as per Policy G5), as too often Policy 6 D is only retrospectively applied, after planning permission has been granted, as validation lists do not currently fully address requirements for the consideration of biodiversity. Biodiversity Accounting can be implemented, as with Policy G5, starting at major applications and thresholds lowered through borough Local Plans, as required.

Under point E, reducing deficiency to access is, broadly agreed but needs to be balanced through local decision-making against the fragility of any existing, new or enhanced habitats, as public pressure can be a major factor in the reduction of the biodiversity value of sites.

Policy G7: Trees and Woodland

SUPPORT WITH CONDITIONS. The London Borough of Sutton supports Policy G7, particularly where tree planting is located at strategically identified points.

- Under paragraph 8.7.2, a 10% increase in tree cover should also follow the 'right tree, right place' approach, specifically considering the existing habitat type and value and a presumption favouring the promotion of native trees for biodiversity gains. Those specifically considered as adapted for a changing climate do not have (or have far fewer) ecological associations than native species.

Policy G8: Food Growing

SUPPORT WITH CONDITIONS. The London Borough of Sutton supports local food growing and the use of innovative techniques, including green infrastructure but this must not be at a detriment to creating biodiverse green infrastructure and may only be appropriate in a limited number of developments.

Policy G9: Geodiversity

SUPPORT. The London Borough of Sutton supports the broad approach to geodiversity conservation proposed throughout London.

³ https://www.cieem.net/data/files/Publications/Biodiversity_Net_Gain_Principles.pdf

Chapter 9: Sustainable Infrastructure

Policy SI1: Improving air quality

SUPPORT WITH CONDITIONS. The London Borough of Sutton supports Policy SI1 as it addresses the urgent need to improve air quality across London, particularly in areas of high human exposure. The policy goes significantly further than the existing London Plan to ensure that all developments are least ‘air quality neutral’ and incorporates design solutions to prevent or minimise increased exposure within Air Quality Focus Areas and other areas used by large numbers of people vulnerable to poor air quality. The further policy requirement for large scale redevelopments to demonstrate an ‘air quality positive’ approach involving a range of measures designed to actively reduce air pollution is strongly welcomed, although it would be helpful to include a more precise definition of ‘large-scale redevelopment areas’ to ensure that boroughs are in a stronger position to enforce this approach through the development management process.

Further details should be provided on the range of off-site air quality mitigation measures that could be implemented by developers where it is not practical to do so on-site. The use of offsetting payments for funding such offsite measures as mentioned in Paragraph 9.1.9 should not be encouraged since this would enable polluting developments to proceed and thus slow progress towards meeting the Mayor’s air quality objectives across London.

The supporting text to Policy SI1 would benefit from more cross-referencing to other parts of the plan which will have an essential part to play in achieving an improvement in London’s air quality, such as the emerging London Plan policies for urban greening (Policy G5), energy infrastructure (i.e. NOx emissions from CHP plants) (Policy SI3), assessing and mitigating transport impacts (T4) and promoting healthy streets (Policy T3).

Policy SI2: Minimising greenhouse gas emissions

SUPPORT. The London Borough of Sutton supports Policy SI2 since the proposed carbon reduction targets for new developments and major refurbishments are ambitious and consistent with the Mayor’s long-term commitment to London becoming a zero carbon city by 2050 and the Council’s ‘One Planet Vision’. The following policy measures are particularly welcomed:

- Carrying forward the existing requirement for all major residential developments to be ‘zero carbon’ including a minimum 35% reduction in CO2 emissions on site;
- The new requirement for major non-residential developments to achieve zero carbon standards;
- Changes to the wording of the Mayor’s energy hierarchy which recognise the need for developments to manage energy demand during construction as well as during the operational phase (Step 1 Be Lean); to exploit local energy resources such as secondary heat as well as supplying energy efficiently (Step 2 Be Clean); and the need to store, as well as generate, renewable energy on site where feasible (Step 3 Be Green);
- The introduction of stronger policy wording to make clear that major developments will be expected to monitor and report on energy performance post implementation and to make

use of an online portal to be established by the GLA for this purpose. This will be particularly important in cases where an offset payment has been made through a s106 agreement on the basis of carbon shortfall calculations in the Energy Statement.

- The introduction of minimum on-site carbon reduction targets to be achieved through energy efficiency measures alone (Step 1 Be Lean). This should increase the scope for developments to deliver overall carbon reductions above and beyond the 35% on-site target and help to minimise the carbon shortfall to be offset.
- The requirement for boroughs to establish, administer and monitor a carbon offset fund with annual reporting.
- The increased recognition that energy strategies submitted in support of major planning applications should address issues such as air quality, overheating, use of smart meters, energy storage and future proofing which do not receive sufficient emphasis in the current London Plan.

While the London Borough of Sutton recognises that the Mayor's proposed carbon price of £95 has been tested as part of the updated viability assessment for the new London Plan and accepts that this higher payment would enable the carbon reduction shortfall to be addressed to a greater extent than the existing recommended price of £60 per tonne, there are concerns that developers within the borough may successfully challenge this requirement as part of the s106 negotiations on the basis of impacts of local assessments of scheme viability and the widespread view that the delivery of affordable housing has a higher priority.

With regard to the Mayor's overall targets for reducing CO₂ emissions across London, it is noted that the interim target of 60% emissions reductions by 2025 has been lost.

Policy SI3: Energy Infrastructure

SUPPORT. The London Borough of Sutton supports Policy SI3 and acknowledges the need to develop energy masterplans for Opportunity Areas and other large scale development locations, such as Sutton Town Centre, Hackbridge and the London Cancer Hub (LCH) site.

While there are some changes in terminology, this policy essentially carries forward the Mayor's existing approach to delivering decentralised energy networks, which is being promoted through the GLA's ongoing decentralised energy enabling project (DEEP). However the Mayor's amended 'heat hierarchy' places significantly increased emphasis on a number of important cross-cutting issues such as the role of low temperature heat networks in achieving cost-effective use of low grade heat, the use of available local secondary heat sources, the use of fuel cells and the need to ensure that any proposed CHP plants or gas boilers are ultra-low NO_x and will have no significant impacts on local air quality. Figure 9.3, which shows Heat Network Priority Areas in relation to areas in breach of legal air quality standards is particularly useful.

The London Borough of Sutton notes that gas fuelled CHP is considered unlikely to be able to meet the NO_x emissions standards required for developments within areas which are already exceeding air quality standards and recognises that alternative technologies such as

heat pumps serving low temperature networks are increasingly likely to be used in future. The production of updated Energy Planning Guidance for London is therefore welcomed.

The supporting text provides some welcome clarity on the minimum specifications and performance standards which should be followed by developers and/or energy infrastructure operators to ensure that heat networks operate efficiently, effectively and reliably.

The London Borough of Sutton does not agree however that the Mayor's abandonment of the current interim target to ensure that at least 25% of heat and power generated in London by 2025 is from decentralised or renewable sources. There should be interim targets on the way to reaching the Mayor's ultimate target of London being a zero carbon city by 2050.

Policy SI4: Managing Overheating

SUPPORT. The London Borough of Sutton supports Policy SI4 which carries forward the Mayor's existing approach to managing overheating set out in Policy 5.9 of the current London Plan 2016. However it is recommended that the wording of the policy itself should contain a more specific requirement for all energy strategies submitted in support of major developments to include evidence to demonstrate that the appropriate CIBSE guidelines have been followed (i.e. TM59 for residential and TM59 for non-residential developments as amended). It would also be desirable for the London Plan to include an updated map showing which locations across London are most likely to be affected by summer heatwaves and the urban heat island (UHI) effect over the coming decades.

In seeking to counter the UHI effect and manage overheating from the earliest stages of project planning and design, developers should recognise the important role of green infrastructure and landscaping (including tree planting and SuDS measures) alongside the various built design measures set out Policy SI4. This policy should therefore be cross-referenced to Policy G5 on Urban Greening.

Policy SI5: Water infrastructure

SUPPORT WITH CONDITIONS. The London Borough of Sutton supports Policy SI5 and notes that the minimum water mains consumption target for residential developments of 105 litres or less per head per day (excluding allowance of up to five litres for external water consumption) has been carried forward from the current London Plan.

It is not clear from Part C(2) whether commercial developments are required to achieve an overall BREEAM rating of 'Excellent', or whether this applies only to the water efficiency criterion. Further clarity and guidance is also required on 'Integrated Water Management Strategies' as referred to in Paragraph 9.5.12 in terms of what they would entail, who should be involved in their preparation and how they can be promoted through Local Plan policies and development management decisions.

Policy SI6: Digital connectivity infrastructure

SUPPORT. The London Borough of Sutton supports the aims of Policy SI6 to enhance digital connectivity across London by ensuring that new developments exceed minimum Building Regulations requirements in Part R1 and leave sufficient space on site in order to

accommodate any digital connectivity infrastructure and mobile connectivity requirements (including appropriate mitigation measures to avoid reducing mobile connectivity in surrounding areas). Furthermore, the proposal in Paragraph 9.6.6 to develop London-wide guidance is welcomed. It is apparent from Figure 9.5 that that average download speeds within the London Borough Sutton of compare favourably with many other parts of London .

Policy SI7: Reducing waste and supporting the circular economy

SUPPORT. The London Borough of Sutton fully supports the aims of Policy SI7 which seek to achieve waste reduction, diversion from landfill and energy recovery from suitable residual waste through promoting the circular economy. This ambition is aligned with the council's One Planet Vision.

However, in determining referable and other major planning applications, further guidance for Boroughs is needed on how strategic or criteria-based planning policies can be framed in an effective way to ensure that such developments actively promote circular economy outcomes (although this can be achieved for proposed waste management operations through application of the Mayor's waste hierarchy).

Policy SI8: Waste capacity and net waste self-sufficiency

OBJECT - UNSOUND - NOT JUSTIFIED. Together with the boroughs of Croydon, Kingston and Merton, the London Borough of Sutton intends to produce a new South London Waste Plan for adoption in 2021. Central to this will be the the apportionments set out in the London Plan as a target for allocating sufficient waste sites. The council notes that the arisings for the four boroughs in 2041 is 845,000 tonnes while the apportionment is 944,000 tonnes. This means that the four boroughs will have to find sites to manage 12 per cent more waste than they produce. Given that Table 6.2 of the plan acknowledges that industrial land is in short supply across the four boroughs (Sutton is to provide industrial land and Croydon, Kingston and Merton are to retain industrial land), the council considers there would be more justification to divert the additional 12% of waste management from the four South London boroughs to boroughs which have excess industrial land capacity and are categorised for "limited release" such as Barking & Dagenham, Havering and Newham.

Policy SI9: Safeguarded waste sites

SUPPORT. The London Borough of Sutton supports Policy SI19.

Policy SI10: Aggregates

SUPPORT. The London Borough of Sutton supports Policy SI10.

Policy SI11: Hydraulic fracturing

SUPPORT. The London Borough of Sutton supports Policy SI11.

Policy SI12 Flood risk management

SUPPORT WITH CONDITIONS. The London Borough of Sutton supports the overall aims of Policy SI12. However the policy should make a clearer distinction between the respective approaches which need to be followed by developers in managing surface water and fluvial flood risks. To avoid confusion, these issues should ideally be dealt with in different policies.

Policy 5.12 of the current London Plan 2016 on 'Flood Risk Management' is particularly helpful in this regard since it is separated out from Policy 5.13 on 'Sustainable Drainage' and deals primarily with managing fluvial flood risks in EA flood zones adjacent to watercourses, the sequential and exceptions tests, designing for flood resilience and resistance and emergency planning etc . While Policy 5.12 makes clear that development proposals "must comply with the flood risk assessment and management requirements set out in the NPPF and the associated technical guidance on flood risk and have regard to measures proposed in "Catchment Flood Management Plan", this degree of clarity is lacking in Policy SI12.

Cross-references should be provided as appropriate to key nationally adopted guidelines such as Environment Agency's (EA) standing advice on preparing flood risk assessments (see <https://www.gov.uk/guidance/flood-risk-assessment-standing-advice>) and Government guidance on flood resilient construction. The role of the EA as a statutory consultee for planning applications located within fluvial flood risk areas (Flood Zones 2 and 3a) is also not made clear in the supporting text.

Policy SI13 Sustainable drainage

SUPPORT WITH CONDITIONS. The London Borough of Sutton supports the Mayor's drainage hierarchy in Policy SI13 and the target for all developments to achieve greenfield run-off rates where feasible. However the policy wording should be strengthened by deleting the words 'aim to' from Part (B) to read "*Development proposals should achieve greenfield run-off rates...*" Policy SI13 should also clarify how climate impacts should be factored in and state whether any reduction in run-off *volumes* is expected as well as seeking to reduce run-off rates to greenfield levels.

It is also considered that this policy should expand upon the proposals set out in the London Sustainable Drainage Action Plan, e.g. the need to exploit opportunities for retrofitting SuDS measures in urban areas at risk from surface water flooding and/or overheating as part of highways improvements, transport schemes and area regeneration projects.

Policy SI14 Waterways - strategic role

SUPPORT. The London Borough of Sutton supports Policy SI14 in that it recognises the multifunctional benefits of river corridors in terms of delivering a range of environmental, social and economic benefits for human health and well-being, biodiversity, flood risk management, sustainable drainage, heritage, landscape quality, and cultural and community activities. The benefits for wider climate change adaptation objectives (e.g. urban cooling) should also be highlighted in this part of the plan.

Policies SI15-SI17

No comment.

Chapter 10: Transport

The London Borough of Sutton has already commented extensively and robustly on the proposals set out in the draft Mayor's Transport Strategy, which support Policies T1-T9. In summary:

Policy T1: Strategic approach to transport

OBSERVATION. The target in A(1) and associated delivery will be very challenging. With no Underground, Overground or Tramlink network, 80% of the London Borough of Sutton's population live in areas with PTAL of 0-2, and while 95% of the urban area falls within 400m of a bus service many of these are only a single low frequency service, with lack of services at weekends and in the evenings. It would be useful to see delivery milestones between now and 2041, otherwise this could become a long-term and potentially unrealistic target. It may be appropriate to use a more robust approach to target setting, such as setting modal shift targets by PTAL level.

Policy T2: Healthy Streets

SUPPORT. The London Borough of Sutton supports this approach and is already considering the policy as part of proposals to increase housing in town centres.

Policy T3: Transport capacity, connectivity and safeguarding

SUPPORT. The London Borough of Sutton supports this approach, and the inclusion of a proposed Tramlink extension to Sutton is very welcome.

Policy T4: Assessing and mitigating transport impacts

OBSERVATION. The ability of developers to "net off" floorspace means that the levels of developer contributions or CIL within the London Borough of Sutton are unlikely to be sufficient to make large scale transport improvements, and so the council would be reliant on TfL and/or DfT/Network Rail to bring forward schemes. This means that regional and national support for Tramlink extensions to Sutton and the London Cancer Hub, Crossrail 2 to Worcester Park station and Metroisation (from West Croydon to Belmont, and the Mitcham Junction line via Hackbridge to Cheam) are essential.

Policy T6 - Car Parking

OBJECT - UNSOUND - NOT JUSTIFIED. The low public transport accessibility, high level of car ownership and number of out-commuters in the London Borough of Sutton, together with an expanding number of school places and pupils travelling some distance, means that the private car will continue to be a significant mode for many years to come. As such the London Borough of Sutton does not support a 'one size fits all' approach to town centre car-free development.

With regard to Policy T6.1C and provision of electric vehicle charging infrastructure in new residential developments, the London Borough of Sutton welcomes proposals for electric vehicle charging but questions why only residential developments have a particular ratio of spaces with provision, as opposed to retail and business developments which do not. Also, a question as to whether there is a need for passive provision for all remaining spaces in residential developments given that demand is unlikely to be this high during the plan period?

In respect of Policy T6.3 and retail parking, the London Borough of Sutton questions whether the figures in table 10.5 (maximum retail parking standards) give sufficient consideration to

supermarkets, particularly those located in town centres such as Sutton, where the ratio of spaces to floorspace is more than double the proposed figure.

Policy T7: Freight and servicing

SUPPORT WITH CONDITIONS. The London Borough of Sutton supports measures to reduce the impact of freight on local roads and in town centres but would welcome support for more enforcement powers to reduce the impact of multiple deliveries, particularly at peak times.

Policy T8: Aviation

SUPPORT WITH CONDITIONS. The London Borough of Sutton recognises the need for residents and local businesses to access Heathrow and Gatwick airports by public transport. With regard to Heathrow, improvements are needed for public transport access whether there is expansion or not.

Policy T9: Funding transport infrastructure through planning

SUPPORT WITH CONDITIONS. The policy identifies that Mayoral Community Infrastructure 2 (MCIL2) will be introduced in April 2019 for Crossrail 2 – but if no agreement on Crossrail 2 funding is agreed then the funding is to be used for non-specified strategic transport projects. The Mayor should be clear about what these alternative projects would be in order to justify the implementation of MCIL2. The council considers the Tramlink extension to Sutton would be a most suitable candidate in this eventuality.

Chapter 11: Funding the London Plan

No comment

Chapter 12: Monitoring

No comment

London Borough of Sutton comments

Page: [Policy HC5 Supporting London's culture and creative industries](#)

Section: [N/A](#)

Support - Culture

Recognise and specify the role of libraries and heritage in CEZ. There is no mention here. Very often a great deal of local cultural activity and encouragement of the arts happens in libraries, E.G. the art gallery in Willesden Green library Brent, cultural programming and commissioning in Sutton and new art gallery.