

Sutton's Environment Strategy FAQ

Topic: Planning/ Building

The council consulted on its Environment Strategy for eight weeks in August 2018. As well as answering the questions, participants were invited to provide comments. We received nearly 700 comments, all of which were reviewed and influenced the final draft of the strategy. A lot of the comments were very similar, and we have curated these comments into a comprehensive FAQ documents giving the answers for the public to view.



1. How will you ensure that new developments comply with the commitments and targets in the Environment Strategy?

The commitments and targets set out in the Environment Strategy are fully reflected in Sutton's new Local Plan adopted in February 2018. As a local planning authority, the council is therefore able to work with developers to ensure that all new developments comply with the relevant policies in the Local Plan and, by extension, the Environment Strategy.

2. The targets are laudable but not achievable with the current planning policy, with every spare piece of land taken up by new housing and all giant garden-grabbing extensions given planning permission which contradicts the ambition to achieve 50% green space.

Sutton's new Local Plan (February 2018) supports the 50% green space target by requiring all developments to incorporate green space, green roofs and sustainable drainage measures as part of the design and layout; requiring all major developments to increase green coverage by at least 10% and requiring all major developments to demonstrate an improved 'green space factor' (GSF) score based on the council's new GSF scoring system. The new plan also maintains strong policy protection for green belt, metropolitan open land (MOL), green chains, public open space, nature conservation sites and green corridors. It also has a strong policy to prevent development on back garden land.

3. How is the use of sustainable energy being embedded into your planning framework?

Sutton's new Local Plan (February 2018) sets a requirement for all new developments to minimise carbon dioxide (CO₂) emissions in line with the Mayor's energy hierarchy (1) be lean - use less energy (2) be clean - supply energy efficiently; and (3) use renewable energy. The use of low or zero carbon energy (or 'sustainable energy'), is strongly prioritised both in terms of supplying any district, site-wide or communal heat networks proposed under step 2 of the hierarchy and through promoting on-site renewable energy under step 3. The new target for all major residential developments to achieve 'zero carbon' by achieving at least a 35% on-site reduction in emissions compared to the Building Regulations and offsetting the remaining emissions by contributing towards further CO₂ reduction measures elsewhere is also expected to provide a major impetus for increasing the use of sustainable energy within the borough.

4. How will you ensure green spaces are included in new developments. This is particularly important for flats/high rise buildings.

Sutton's new Local Plan (February 2018) requires all proposed developments to incorporate green space as part of the design and layout; sets a target for all major developments to increase green coverage by at least 10% and includes a new 'green space factor' (GSF) scoring system – one of the first to be introduced in London. All major developments are required to demonstrate an improved GSF score compared to previous conditions prior to redevelopment. Details of Sutton's GSF scoring system are set out in a guidance note for developers introduced by the council in July 2018.

- 5. Enforce the policy of not building in back gardens. I look forward to the green corridors which might encourage walking. It is a shame that the path from Warren Park towards Sutton ends in the railway on both side - great if it could join the bottom of Morland Road or even Langley Park Road. I can't imagine a bridge would be built over the railway to accommodate it unfortunately.**

Policy 13 of Sutton's new Local Plan (February 2018) has strengthened the council's policy stance against back garden and front garden development. Proposals for garden land development can now be refused for local character, ecological, flooding and/or neighbour amenity reasons. It should be noted that the council has been largely successful in enforcing this policy over the last decade, with fewer than 4% of new dwellings built within the borough since 2009 being located on back garden land.

- 6. Stop building, particularly tower blocks which bring more people and create more pollution. How do you expect to meet the green space targets with the rate of development and building on green space which taking place?**

Sutton's new Local Plan (February 2018) maintains strong policy protection for green belt, metropolitan open land (MOL), green chains, public open space, nature conservation sites, green corridors and back garden land. It should also be noted that since 2005, there has been a net gain in public open space within the borough of 13.5 hectares. The council has an annual housing target of 427 new homes per year and these homes are allocated on brownfield land.

- 7. It doesn't matter how much low energy you use, this is still additional energy and new homes which increases the boroughs environmental impact.**

The council is required by the Government and the Mayor of London to increase its housebuilding rate. In the council's Local Plan, house building increases from 363 new homes per year to 427 new homes per year, which the council considers is a reasonable increase and which can be accommodated on brownfield land. It is not a realistic option for the council to stop all house building – and any Local Plan which did so would not be deemed 'sound' at Examination-in-Public. Given that fact that a borough housing target is in place, it becomes even more important to minimise energy demand and CO₂ emissions from each new dwelling through efficiency measures and promoting low or zero carbon energy sources.

- 8. All new builds should be built with a garden area and not built so high that it becomes a concrete jungle (example is the buildings around Sutton train station).**

While Sutton's new Local Plan (February 2018) identifies 'areas of taller building potential' in a small number of town centre locations, these are mostly limited to mid-rise buildings (4-6 storeys) outside of Sutton Town Centre. While 'very tall' buildings (over 11 storeys) are allowed in the area immediately adjacent to Sutton Station, the council believes that well designed taller buildings can be appropriate in the right place if they are integrated into the local character and context. The council also considers that concentrating housing growth in and around town centre locations well served by public transport and within easy walking distance of shops and other local services is necessary to protect open space and the 'suburban character' of the borough's existing residential heartlands.

9. Why are you allowing Sheen Way and Rosehill, etc to be built on?

While the council recognises the importance of the borough's green spaces to local residents and to the character of the borough, local authorities have a statutory duty to ensure there are sufficient school places to meet the anticipated demand. In 2016, the council identified that two new secondary schools would be needed in the future. The first is being built on brownfield land at Sutton Hospital. However, a large enough site for a second school was impossible to identify on brownfield land and so the council decided that building a school on the previously developed area within Rosehill Recreation Ground would be the area to cause the least harm to the borough's open spaces.

The Sheen Way site is not currently public open space. While the council intends to develop part of this site for a special educational needs (SEN) school, the remainder of the site will then become available for public open space.

10. Through saying no net loss - this implies that existing mature green spaces can be used for building with new green areas being the trade off. A new or reclaimed green area will take many years to reach the biodiversity of existing mature green sites.

Sites of Importance for Nature Conservation (SINCs) are covered under Policy 26 of the Local Plan and the Technical Guidance Note: Building a Sustainable Sutton. The Technical Guidance Note applies various 'risk factors' to developments that would remove natural habitats. The higher the value of the starting habitat, which is based on habitat type and habitat condition, the harder it is to difficult to deliver No Net Loss and Net Gain. Mature habitats are generally of higher value and thus more difficult to mitigate for. The Technical Guidance Note aims to deliver No Net Loss on the development site, with compensation being due if No Net Loss cannot be delivered in situ. This will go towards delivering biodiversity work elsewhere in the borough.

In addition, Policy 28 of the Local Plan states that, when a development proposal is submitted, "a landscaping scheme should be submitted alongside the planning application which makes provision for the retention of existing trees, recognising their habitat, that are important by virtue of their significance within the local landscape". It adds that significance may result from the tree's size, form or maturity or because they are rare or unusual.

11. Do you have any plans to allow building in back/ front gardens?

Policy 13 of Sutton's new Local Plan (February 2018) has strengthened the council's policy stance against back garden and front garden development. Back garden development can be refused for reasons of local character, ecology, flooding and/or effect on the neighbour's amenity. It should be noted that fewer than 4% of new dwellings built within the borough since 2009 being located on back garden land. It should also be noted that the council has strongly objected to the Mayor of London's Draft London Plan for proposing the development of garden land.

12. Could you introduce the requirement for planning permission for block paving?

No. Most paving nowadays is done through permitted development (ie the Government stipulates no planning application is required). If a person uses permeable paving, no planning application is required. If a person uses non-porous paving, only when the paved area is greater than 5sqm is a planning application required.

13. How will you discourage people from paving over their front gardens?

In the 'A Greener Borough' action plan we have committed to running campaigns every two years to raise awareness about the impacts that paving over front gardens has for biodiversity and flood risk, encouraging a return to gardens. This will include actions such as installing Sustainable Drainage Systems (SuDS) which are a way of using natural features such as rain gardens to reduce flood risk.

14. Make the area by Carshalton Ponds a pedestrian area. If not possible during the week, then weekends, or Sundays.

The road network around the Carshalton Ponds are the responsibility of both TfL and LB Sutton, with the main road being a heavily trafficked 'A' road managed by TfL, and it is not feasible to remove through traffic at any time without incurring significant traffic congestion across a wide area. Furthermore there are bus routes that run through the area, and there would be significant impacts to routes and passengers who use them, which it is considered would be unacceptable.

15. Housing is needed. How will this strategy enable that to still happen?

The strategy is realistic that we need to provide high quality housing for Sutton's population. We think this can be achieved alongside protecting the environment, for example by having high quality design that is sympathetic to the local area. Recently completed new council houses have gardens, water butts, are well insulated and have solar panels where practical. We also need to work with private developers through the council's planning responsibilities to make sure homes built are future proof from a changing climate.

16. Stop replacing pavements in black/grey. Use a colour to brighten up those town or street centres. It will help to restore those centres. Do not make the same mistake as at Hackbridge corner - cars and pavements do not mix - there needs to be separate areas - so why not make pavements red or green to differentiate.

The design process for replacing pavements is based on using the most appropriate materials, which are also economical as well. Tarmac is the most appropriate material in residential areas, and the use of colour materials is not recommended as this creates an unnecessary maintenance liability. In busier town centre areas material choices are broader as there is a public realm aspect to consider, although these material choices also to be mindful of long term maintenance implications as paving materials and types will vary over time, and replacing high quality and expensive materials can become increasingly difficult to manage.