

Comment Ref	Consultee Ref	Consultee Name	Plan Ref	Comment
1	1	National Grid (Agent: Amec Foster Wheeler)	General Observation	National Grid has appointed Amec Foster Wheeler to review and respond to development plan consultations on its behalf. We have reviewed the [Sutton Local Plan -Main Modifications] consultation document and can confirm that National Grid has no comments to make in response to this consultation.
2	2	Forestry Commission, South and London Area Office	General Observation	The Forestry Commission is not in a position to input into the consultation process for Local Plans.
3	3	Natural England	General Observation	Natural England does not have any specific comments on this local plan.
5	5	Highways England	General Observation	Having examined the modifications to the Local Plan, we do not offer any further comments to this consultation at this time.
8	8	The Mayor Of London	General Comment	As I am sure you are aware, the Mayor published his draft London Plan for consultation on 1st December 2017. It is anticipated the Examination in Public of the London Plan will take place in the Autumn 2018 with publication in Autumn 2019. Once published, the new London Plan will form part of Sutton's Development Plan and contain the most up-to-date policies. The Sutton Local Plan is required to be in general conformity with the current London Plan, however its policies will become out of date as the draft London Plan gains more weight as it moves towards publication. In addition, the draft London Plan will now be a material consideration in planning decisions. In light of the above, the Mayor would expect Sutton to consider an early review of its Local Plan to take into account its increased housing target and other matters.
39	10	Mr Alec Arroll Savills for Thames Water	Comment on Site S76 and Industrial Land Capacity	<p>We are writing on behalf of Kennet Properties / Thames Water in response to the consultation that the Council is undertaking on the proposed Main Modifications to the Local Plan. We understand that the Modifications being proposed are those that the Council consider are necessary in order to make the Local Plan sound. This follows the issuing of an initial advice note by the Inspector overseeing the Examination into the Local Plan who, following the hearing sessions and previous representations made during the Local Plan process, identified a number of issues that he considered needed to be addressed if the document was to be found sound. Consequently, Kennet Properties does not repeat previous submissions made during earlier stages of the Local Plan and Hearing Sessions except where these are directly relevant to the Modifications made. In particular, throughout the Hearing Sessions Kennet Properties explained it was their view that the industrial land requirement over the 15-year Plan period was greater than the 10.1ha that the Local Plan was seeking to provide. In light of the Inspector confirming that in his opinion the 10.1ha is a robust figure to plan for, the comments submitted within this letter are based upon this figure being the accepted level of industrial development that the Local Plan needs to deliver.</p> <p>As previously explained, Kennet Properties interest is primarily in its landholding at Beddington Lane, which it has been promoting for industrial use. This submission therefore confines itself to matters related to this. Under each Modification we set out why we agree that the modification is needed in order to make the Plan sound and consider these against the Government's test of soundness:</p> <ul style="list-style-type: none"> - Is the modification positively prepared? - Is the modification robust (based on evidence)? - Is the modification effective (deliverable)? - Is the modification consistent with national planning policy? <p>Kennet Properties Response in relation to the Employment Land Provisions in the Local Plan proposed in the Main Modifications</p> <p>Kennet Properties in its previous submissions to the Local Plan and at the Examination Hearings set out its concerns that the level of industrial development anticipated to be delivered exclusively through the intensification of existing sites within the Beddington Strategic Industrial Locations (SIL) was unrealistic and would lead to a shortfall in the additional industrial floorspace required during the lifetime of the Local Plan. In the Post Hearing Advice Note (ED42) the Examination Inspector has confirmed his view that the target to deliver 10ha of additional industrial land is a robust target, but that the intensification of the SIL was not likely to deliver any more than 20,000m2 of floorspace. In his view this meant that there was a shortfall of at least 5ha of industrial land and that additional allocations were required to address this, if the Local Plan was to be found sound.</p>

In response to the Inspector's advice note the Council has reviewed the sites that it now considers are deliverable (ED44) during the lifetime of the Local Plan. The table below sets out the sources of supply the Council now considers will be delivered, each of which Kennet Properties considers below.

Source of Supply Net Additional Floor Area	
(A) Intensification of the Beddington SIL	22,079m ²
(B) Site Allocation s54 'Plumpton Way'	2,800m ²
(C) Oldfields Road Established Industrial Location	4,932m ²
(D) Site Allocation S76 'Land West of Beddington Lane'	17,600m ²
(E) Other Sites not identified in L.11.H	
- Former Carlsberg Site, Beddington SIL	1,770m ²
- Zotefoams Site, Beddington SIL	2,300m ²
Total	51,481m ²

Intensification of the Beddington SIL

The Council has concluded that approximately 22,000m² of floorspace can be delivered through intensification at Beddington SIL (ED44). In reaching this conclusion the Council has correctly assumed that there would be no additional floorspace delivered by sites that are: safeguarded for waste uses; sites affected by general parking requirements or have uses which rely on open areas; and sites that have an irregular configuration. The Council identifies that these revisions affect sites 4, 8, 12, 21, 22 and 23 (as listed in table 26 of Appendix 7 in the Sutton Industrial Land Phase 1 – Baseline Survey (L.11.H)). By deleting these sites (or revising down their anticipated quantum of floorspace delivery) there is a total reduction of 30,190m² from the original estimate of 52,269m² of floorspace that the Council's consultants considered could be delivered through intensification of sites in the Beddington SIL to a plot ratio of 0.4

Kennet Properties considers such an approach provides a more realistic assumption as to what could potentially be delivered through intensification whilst ensuring it does not conflict with the South London Waste Plan or the regeneration principles set out in the Beddington Regeneration Framework (L11.I) and also takes account of the practicalities of developing out irregularly shaped sites. However, Kennet Properties notes that this revised figure still assumes that site 18 will deliver net additional floorspace. This is potentially at odds with the Regeneration Framework which identifies this site opportunity as a potential car park to address on-street parking problems, rather than providing additional industrial premises. Therefore one could argue that this site should also be removed as a potential intensification site. However, even if the site is removed, this would only mean that the Council have overestimated the potential floorspace by 626m² (or 0.16ha of land).

Site Allocation S54 'Plumpton Way' and Oldfields Road Established Industrial Location

In addition to the above revisions, the Council has also identified two additional sources of industrial supply through intensification, outside of the SIL, which were not previously included in their calculations of deliverable industrial floorspace. This includes development at Plumpton Way (Site S54) with an additional 2,800m² and development at Oldfields Road (which has a planning consent for a net additional 4,932m² of industrial floorspace).

Kennet Properties has no objection to the Council including such sources of supply where there is a net additional increase in floorspace being provided. However, it is noted that the Plumpton Way site already includes industrial floorspace (the total building footprint being c. 2,500m²). Therefore this would need to be deducted from the total amount of floorspace that would be provided if the entire site were redeveloped at a plot ratio of 0.4. Consequently the total net additional floorspace that would be provided if the entire 0.7ha site were to be redeveloped may actually only be circa 300m² (i.e. 0.7ha x 40% - 2,500m² = 300m² net additional land).

Site Allocation S76 'Land West of Beddington Lane'

The Local Plan Issues and Preferred Options Document (L.3.A) included three parcels of Metropolitan Open Land (MOL) that were considered for future industrial use, but were not ultimately progressed to the Draft Local Plan (L.1.A):

- S76 'Land West of Beddington Lane (A)'
- S77 'Land West of Beddington Lane (B)'
- S78 'Land at Jessops Way'

However, in light of the findings of ED42 and the Council's review of deliverable sites set out in ED44 it was necessary to identify additional land. The Council has therefore chosen to now allocate S76. Based upon a plot ratio of 0.4 across the site which is 4.4ha in size, this would provide 17,600m² of additional floorspace.

Kennet Properties confirms that the site is available for development and that they are indeed preparing proposals to progress pre-application discussions with the Council over the site's development for industrial uses. The work done to date demonstrates that 17,600m² of floorspace is achievable on site and, indeed, a greater density of development may ultimately be delivered. However, for the time being a 0.4 plot ratio is a sensible indicative quantum of development to assume could be delivered on site. Kennet Properties envisages that a planning application could be submitted towards the end of 2018 and that there is very strong market interest in the site.

Other Sites not identified in L.11.H

During the examination hearings the Council mentioned two sites that were not identified in the Beddington Regeneration Framework (L.11.H) as potential intensification sites. These were the Former Carlsberg Site and the Zotefoams Site. In the case of the Zotefoams site, Kennet Properties agrees that through the consent of planning application ref: D2017/78110, there is a realistic prospect that this site will deliver an additional 2,300m² of industrial floorspace through intensification.

In relation to the Carlsberg Site, it is understood that the site is now under offer with Carlsberg having vacated the site. It is Savills understanding that the prospective purchaser does not have any plans to redevelop the site. Notwithstanding this, Kennet Properties concurs that the building coverage of the site is approximately 31% and therefore if redevelopment were to be proposed to intensify use to a plot ratio of 0.4, an additional 1,770m² of floorspace would be achievable.

Summary of deliverable Industrial Floorspace in light of the above

In light of the above analysis it is therefore our view that the following level of floorspace is likely to be delivered through the Local Plan.

Source of Supply	Net Additional Floor Area
(F) Intensification of the Beddington SIL	21,453m ²
(G) Site Allocation s54 'Plumpton Way'	300m ²
(H) Oldfields Road Established Industrial Location	4,932m ²
(I) Site Allocation S76 'Land West of Beddington Lane'	17,600m ²
(J) Other Sites not identified in L.11.H	
- Former Carlsberg Site, Beddington SIL	0m ² (1,700m ²)
- Zotefoams Site, Beddington SIL	2,300m ²
Total	46,585m ² (48,285m ²)

Given that the Inspector has confirmed his view (ED42) that 40,500m² is the required level of industrial floorspace that the Local Plan needs to plan for, what the above analysis demonstrates is that, with the allocation of S76 it can reasonably be expected that the strategy within the Local Plan will now deliver the required level of industrial floorspace, even if the sites that have been highlighted above are not included.

Detailed Assessment of the Allocation of S76 'Land West of Beddington Lane'

With the allocation of S76 Land West of Beddington Lane, the Council can now demonstrate that they have put in place a Local Plan that can be reasonably expected to achieve the required level of additional industrial floorspace during the lifetime of the Local Plan. Kennet Properties considers this approach sound for the following reasons.

First, as the Council made clear during the Hearing Sessions, in order to bring forward additional industrial land, the only available options would be to release either Metropolitan Open Land or Green Belt land. All other sources of land have been exploited. As we have set out in earlier representations, we concur with this assessment.

In preparing its Local Plan, a comprehensive review of the Green Belt and MOL in the Borough was undertaken (L.13.A and ED21). This identified a total of 7 parcels of land that were considered Potential Areas of Change as they were identified as being poorly performing areas in relation to the function of Green Belt or MOL. Of the seven parcels of land considered for release, only 3 were considered suitable for future potential industrial uses. This included the land west of Beddington Lane which consists of sites S76 and S77.

In its Hearing Statement in relation to Issue 10, Kennet Properties set out its concern regarding the reassessment of the 7 parcels of MOL that the Council undertook in ED21. This is because in terms of assessing whether a site that is currently designated as MOL should be allocated for development, such an assessment should be considered in two parts. The first part is an assessment as to the contribution it makes to MOL. The second part is an assessment as to the suitability and sustainability of the site for the potential use being considered. We will not repeat the assessment that Kennet Properties set out in its Hearing Statement on Issue 10, but would stress the conclusion of the re-appraisal was that “site 76 weakly fulfils the function of MOL. Compared to the other parcels of MOL land considered for employment, it is deliverable and achieves the highest score for sustainability when considered against criteria relevant for an employment allocation.” In light of the above appraisal, Kennet Properties agrees that it was a sound basis for the Council to reconsider sites 76 and 77 for allocation for industrial uses.

However, the Council has also reconsidered S78 for potential allocation for industrial use in its review of Industrial Land Supply for Proposed Modifications ED42. This was not considered a site suitable for release in the Council’s Green Belt and Metropolitan Open Land Review and this same conclusion was reached in ED42 on the basis that it was considered that the site still performed a strong MOL function and that the site is currently in use as an open air recreational facility which is consistent with its designation as MOL. Kennet Properties considers this assessment to be sound.

In assessing sites S76 and S77 the Council sets out that the main difference between the two sites as being:

- S77 falls within the Wandle Valley Regional Park whereas S76 does not
- S77 provides a frontage for the Wandle Valley Regional Park onto Beddington Lane
- The construction of the ERF, immediately to the west of S76, has significantly weakened the MOL function of this site.

As a consequence of the above points, the Council concludes that S76 should be allocated for development. On the basis that S76, together with the other sources of supply identified in ED44, exceed the required 40,500m² the Council confirms there is no need to release further MOL. Consequently S77 is not dedesignated. Kennet Properties supports the assessment that S76 now only weakly performs the functions of MOL and should therefore be allocated for industrial use as an extension to Beddington SIL.

Kennet Properties set out in its Hearing Statement on Issue 10 why it considered there to be exceptional circumstances that warranted the de-designation of S76 from MOL. In ED44 the Council also set out why they consider there to be exceptional circumstances that support the de-designation of S76 from MOL. In summary, the exceptional circumstances are:

- ☑ The Council’s two other SILs and Existing Industrial Land (EIL) sites do not have any capacity to intensify. Intensification of Beddington SIL will not deliver sufficient additional employment land. Beddington SIL is the Borough’s most important employment area already accommodating 70% of employment land and 55% of the borough’s total built industrial floorspace. It is also the only area that has the potential to form a natural extension to the SIL.
- ☑ Beddington SIL is one of London’s reservoirs of employment land, therefore its regeneration is of regional importance.
- ☑ Other local authorities within the same Property Market Area (PMA) are unable to help towards Sutton’s Employment land requirements.
- ☑ Additional industrial floorspace will help facilitate the wider regeneration on the Beddington SIL in accordance with the Beddington Regeneration Framework
- ☑ It will help to deliver jobs for the Borough’s residents in a sustainable manner that reduces the need for residents to commute out of the Borough for work.
- ☑ The construction of the adjacent ERF means that S76 now only weakly fulfils MOL functions, meaning that there has been a tangible change in the status of the land warranting a review of the MOL boundaries in this location through the Local Plan.
- ☑ S76 is a previously developed site consisting of former sludge drying beds associated with the operation of the Sewage Treatment Works (STW). The prioritising of development on previously developed sites is a core planning principle set out in the NPPF.
- ☑ The new access road leading to the ERF and the ERF building itself, together with the physical features of the site mean that the resulting MOL boundaries would be clear, defensible and would endure beyond the plan period, as required by paragraph 83 of the NPPF.

				<p>In conclusion, the addition of the allocation of S76, is sound for the following reasons:</p> <ul style="list-style-type: none"> ☑ It ensures that the Local Plan's strategy, in so far as it relates to Industrial Floorspace, has been positively prepared i.e. it seeks to meet the objectively assessed need for the Borough. ☑ The proposed modification is justified in that reasonable alternatives have been considered through the review of existing MOL and consideration of preferred sites and the extent to which they meet the function of MOL. It forms a natural extension to Beddington SIL which is of regional importance being designated as one of London's strategic reservoirs of industrial land. ☑ The proposed modification is deliverable. Kennet Properties confirms the site is available for industrial development; they are proactively starting pre-application work with a view to submitting a planning application in 2018 and that there is very strong market demand for the site. ☑ The proposed modification is consistent with national policy in that there are exceptional circumstances that warrant the review and de-designation of MOL and that such changes should be undertaken through the preparation of a Local Plan review. <p>For completeness we set out the individual modifications made to the Local Plan that relate to the above analysis to confirm the specific changes that Kennet Properties support and deem necessary to make the Local Plan sound.</p>
48	10	Mr Alec Arroll Savills for Thames Water	Conclusions	<p>In conclusion, Kennet Properties supports the Council's Modifications that now remove "S76 Land West of Beddington Lane" from MOL and designate it as an extension to Beddington SIL. The modifications outlined above, collectively, are considered sound for the following reasons:</p> <ul style="list-style-type: none"> ☑ They ensure that the Local Plan's strategy, in so far as it relates to Industrial Floorspace, has been positively prepared i.e. it seeks to meet the objectively assessed need for the Borough. ☑ The proposed modifications are justified in that reasonable alternatives (for removal of MOL and allocation of industrial land) have been considered through the review of existing MOL and consideration of preferred sites and the extent to which they meet the function of MOL. Site S76 forms a natural extension to Beddington SIL which is of regional importance being designated as one of London's strategic reservoirs of industrial land. ☑ The proposed modification is deliverable. Kennet Properties confirms the site is available for industrial development; that they are proactively starting pre-application work with a view to submitting a planning application in 2018; and that there is very strong market demand for the site. ☑ The proposed modification is consistent with national policy in that there are exceptional circumstances that warrant the review and de-designation of MOL and that such changes should be undertaken through the preparation of a Local Plan review. S76 is a previously developed site consisting of former sludge drying beds associated with the operation of the Sewage Treatment Works (STW). The prioritising of development on previously developed sites is a core planning principle set out in the NPPF.
53	12	Ms Vilma Walsh Firstplan for Cappagh Ltd	General Comments, relating primarily to MM55, MM56, MM78, MM79, MM132	<p>1. Introduction</p> <p>1.1 The following comprises a statement of objection on behalf of Cappagh Ltd to the proposed Main Modifications ('MM') of the Sutton Submission Draft Local Plan – available for consultation until Friday 12 January, 2018. The objections relate to five inter-linked main modifications which are detailed at Table 1 below. The specific parts of the modification to which the objection relates are highlighted in yellow for ease of reference.</p> <p><i>[Council Note: Table not reproduced in this schedule but has been sent to the Inspector]</i></p> <p>1.2 As the issues raised by the objections to the main modifications identified above are interlinked they are dealt with jointly below. The objections are further detailed by reference to the Inspector's Post Hearings Advice Note (ED42) and in particular the Council's Note on Industrial Land Supply (ED44) as this provides the key points on which the Council have sought to support the Main Modifications identified above.</p> <p>1.3 This objection is also made in the context of the previous representations made on behalf of Cappagh at Issues and Options, and Submission Local Plan stage, in the Hearing Statements provided for Issue 5/Policy 14 and Issue 10/Policy 24 and submissions made orally at the Hearing Sessions. These continue to be relied upon in full.</p> <p>1.4 The Inspector's Note (ED42) advised at para 10 that: "...in order for the Local Plan to be found sound my advice is that specific allocations are required to deal with the consequent shortfall of at least 5 ha of industrial land. As part of this process it seems likely that the Council will need to re-visit the 3 sites included in the Issues and Preferred Options document. However, in deciding how to proceed I draw attention to paragraph 83 of the NPPF which also applies to MOL and which provides that boundaries should be capable of enduring beyond the plan period"</p>

1.5 MM55, MM56, MM78, MM79 and MM132 have jointly: failed to make 'allocations' of 'at least 5 ha' – indeed it is considered that the evidence base justifies a significantly greater level than this should be allocated. They have also failed to comply with the requirements of paragraph 83 and indeed paragraph 85 of the NPPF in proposing to release an MOL site which will not: provide boundaries that are capable of enduring beyond the plan period. Nor provide boundaries which will be clear, use physical features that are readily recognisable or likely to be permanent.

2. Industrial Land Supply

2.1 The amount of new land allocated by the MM for industry is below even the Inspector's recommend minimum of 5ha, and significantly short of the 10 h, which is the at minimum considered to be required as detailed in our previous evidence.

2.2 R1.B.C London Industrial Land Demand Report (Figure 15.1 Borough Release Categorisations) indicates that there is a positive net demand in the Wandle Valley property market area, with this being identified as strongest in Sutton and Wandsworth. Specifically for Sutton it is identified in the 'provide capacity' category with a baseline net demand of 14.9 ha of industrial land.

Intensification of the Beddington SIL

2.3 The Council's Note on Industrial Land Supply (ED44) is helpful to some extent in acknowledging the significant flaws in the original consideration of this matter. Particularly with regard to the potential sites available for intensification of the Beddington SIL and the revisions which have been made in this context.

2.4 However, it still continues to rely on intensification of the Beddington SIL to provide more than half of its industrial supply and it still fails to provide any substantive evidence as to how this is going to be achieved. The Study itself L.11.H confirms (Para 7.65) that to help guide larger scale redevelopment opportunities identified "many of the opportunity sites will require site assembly and issue of ownership to be resolved before they can be delivered. This is discussed in the Phase 2 report."

2.5 The Boyer Phase 2 report (L.11.I) notably still remains in draft and no confirmation of its status has been provided. Notwithstanding, neither this report nor any evidence submitted by the council in in respect of the Local Plan Review, provide any clear identification as to how the LPA are going to be able to generate the supply of any meaningful level of new industrial land to meet identified demand. L.11.I itself identifies the findings/challenges identified in the Phase 1 study in terms of limited market churn and static status of businesses located in the SIL (pg. 26).

2.6 The review of opportunity sites in ED44 – has significantly reduced the amount of land identified as having potential for intensification. Indeed, of the larger sites identified as being able to be secured in the 'short term' in the Phase 2 Study (L11.I. pg. 36) by reference to Annex 2 of the council's ED44 – four of those sites have now been discounted. The position remains that a significant proportion of the SIL opportunity sites are in the Council's own study identified as 'long term' sites (page 37 L.11.I). Albeit that Annex 2 of ED44 also deletes one of these sites. Notably no indication is provided in the Phase 2 Study or the Council's evidence as to what is meant by 'short term' and 'long term'.

2.7 The interventions proposed by the Phase 2 Report (L.11.I), and relied upon by the LPA to secure their approach of intensification, are essentially aimed at improving the image of the Beddington SIL and ultimately its economic performance both in terms of values and in terms of job creation. Whilst these interventions are laudable, based on the evidence provided, our position remains that we are extremely sceptical of the robustness of this approach in terms of the extent it can in reality generate any level of meaningful additional industrial floorspace. Beddington SIL is characterised by a large number of differently sized sites, with a high level of occupancy, low level of movement, and in a myriad of different ownerships. There remains a notably lack of evidence from the council with regards to any action they will take in terms of land acquisition to facilitate provision of new floorspace. All of these factors remain as a significant challenge to meeting the level of industrial land provision which is being relied upon as a result of intensification of Beddington SIL.

2.8 In the whole of the previous plan period despite the same policy of intensification being in place only the equivalent of 2.3ha (9,385 sq.m.) of additional industrial floorspace was identified by the council as having been secured by permissions granted since December 2009 (the start of the previous Period). Appendix 1: provides the Revised LB Sutton Industrial Floorspace Applications Table – provided by LBS to Firstplan by email dated 09.01.18 – which now supersedes Table 5, of the Council's Response to Inspector's Initial Questions (ED19), and supersedes Appendix 1 of Cappagh Hearing statement for Issue 5/Policy 14. This was produced and ultimately agreed between the Council and Firstplan as instructed by the Inspector at the hearing sessions.

Site Allocation S54 Plumpton Way

2.9 The Council have raised Site Allocation S54 Plumpton Way seemingly in terms of it comprising a source of new industrial supply. There are two issues with this. First, this is an existing site in an existing EIL – so any redevelopment of this site can only be viewed at most as an intensification of an existing EIL. However, the Council have provided a gross figure for industrial land provision from this site – making no reference to the existing use of the site and treating it as a fully new site. A net figure should have been provided – the contribution of the site has therefore been overstated.

2.10 Secondly, and more importantly, the stated need for 10.1 ha (or 40,500 sq m) of employment floorspace was set out in the Submission Draft Plan (L.1.A) (at that stage to be secured entirely by intensification of Beddington SIL and a job density floor) and in addition to and in the context of the Site Allocation S54 “Trading Estate and Gas Holder” (page 294 & 295) an existing EIL. This specifically envisaged removal of the gasholder site (which had already been decommissioned at that stage) and provided an indicative phasing of April 2021 to March 2026. As such it is unclear why the allocation is referenced, given it was always envisaged and taking it into account the Submission Plan still identified the need for 10.1 ha employment land to be met. Further, it is unclear why this allocation of EIL is relevant given that the means of securing that 10.1 ha and matching supply and demand, as set out at para P14.2 of the Submission Plan and as amended by MM55, is predicated on 1) making every effort to retain existing employment land 2) Intensification of Beddington SIL, and 3) release of some land west of Beddington Lane.

Oldfields Road Established Industrial Location

2.11 It is notable from the Table attached at Appendix 1 and in the Council’s original version of this Table in ED19 that they relied upon the grant of planning permission at Oldfields Road under application B2009/61701 (granted in April 2010) as evidence of how intensification (in this instance not in SIL but in an EIL) has already been secured. It is notable that in Council’s Note on Industrial Land Supply (ED44) they are now also seeking to suggest that that same site (granted in 2010 – with applications made to discharge conditions made in 2013, the permission implemented in 2013 and development completed in 2016/17) should be counted as contributing toward the current Local Plan Industrial Land Requirements (para 1.11 and 1.12 ED44). The need to secure 10.1 ha of employment land and matching supply and demand was put forward by the Council themselves in the Submission Draft Local Plan in the context of the grant and implementation of this planning permission. Similarly to the points raised for the Plumpton Road allocation – the Council appear to be seeking double count these sites.

2.12 The only thing the Oldfields Road Permission assists with is underscoring the length of time it has taken for the redevelopment of that site to come forward under the auspices of an ‘intensification’ policy approach which has been in place for the full extent of the last plan period. Granted in 2010 it was only completed in 2016/17 again underpinning the need for industrial land allocations to be greater than that currently proposed to enable the policy to be robust and effective and ultimately sound. If the Plan is to be considered sound then relying on intensification can only be a limited and long term prospect – and can only reasonably be relied upon together with an appropriate level of new allocated land.

2.13 Again it is noted that this is intensification of an EIL and not the Beddington SIL which is what the Council have stated is the proposed approach for matching Supply and Demand for employment land.

Other Sites Note Identified in L.11.H

2.14 ED44 draws attention to other sites not previously identified in L.11.H. With regard to the Zotefoams Site, Beddington SIL, as was confirmed at the Hearing Sessions, this is a clear example of where an existing occupier of the SIL has sought to expand. Of course this is welcomed and if intensification of the SIL does happen this is the most likely means by which it will be achieved. Indeed, historically, this has been principally how intensification in the Beddington SIL has been achieved (Cappagh Hearing Statement, Issue 5/Policy 14, pg. 2, para 1.5) and this is further supported by the GLA Land Supply and Economy Study (2015) which confirms that "...industrial businesses are more likely to remain in their location than all businesses, possibly because industrial sectors are more established and or it is more difficult for industrial businesses to change location with fixed investments" (pg. 159).

2.15 In the context that the Council have raised this site as an example of how intensification will work – it is relevant to highlight by reference to the application forms that this site is 4.42 ha in area. Applying the Council's plot ration of 0.4 to this site – intensification should have resulted in some 17,680 sq m of industrial floorspace. The stated existing gross internal floorspace is 2,200sq m – so the net increase should have been: 15,480 sqm of additional gross internal floorspace. Nothing like that level has been achieved – the application has only secured an additional 2,300 sq m of gross internal floorspace. Unless new cleared sites are allocated at sufficient levels it is explicitly evident from the Zotefoams application that the policy of relying on more than half of the Council's own identified requirement, which at only 10 ha is considered to be conservative, to be secured by intensification is fundamentally flawed and unsound. The Zotefoams application forms (D2017/78110) are attached at Appendix 2.

2.16 Even if some level of further intensification can be achieved, which it is considered will be primarily by existing businesses expanding and likely to be in the longer term, this does very little to address the needs of local businesses like Cappagh who want and need to expand into the area in the short term or indeed new business needing to locate in the area. As detailed in the Cappagh Hearing Statement for Issue 5/Policy 14 (paras 1.7 – 1.12) the evidence base is clear, including within the Council's own evidence (L.2.R pg. 41, Council Response to Comment Ref 287) that there is a severe shortage of industrial land across south and south west London. There is also very restricted capacity in areas adjoining south-London to accommodate industrial land requirements. Coupled with the identification of certain sectors and industrial activities which are more reliant on London locations than other sectors (see paras 1.14-1.15 Cappagh Hearing Statement Issue 5/Policy 14) – then it is clear that Local Plan even with the proposed Main Modifications will not be able to meet the requirements of its own Strategic Objectives related to Business. Nor, critically, does it meet the NPPF requirements to ensure that: sufficient land of the right type is available in the right places to support growth (page 2); objectively identify and then meet business needs of an area and respond positively to wider opportunities for growth, take account of market signals and set out a clear strategy for allocating sufficient land which is suitable for development taking account of business communities (page 5); meet the development needed of business to support an economy fit for the 21st Century (page 6).

2.17 It is also relevant that not only is the amount of MOL land which has been allocated for industry below even the Inspector's requirement for at least 5 ha of the shortfall to be met, the resulting net additional floorspace to be derived from it has not had any regard to the likely impact of its sensitive location next to the retained MOL and the likelihood that (as compared to sites fully within the SIL) more regard will need to be had to providing sensitive boundary treatments to minimise the impact on the retained adjacent MOL land and WVRP albeit that the need for this is recognised in MM132. It is unlikely that MOL sites allocated for release immediately adjacent the WVRP will be able to be developed to the same intensity as those fully within the SIL yet the expected plot ratio has remained the same. If MOL land release is the only option to meet the identified shortfall in industrial land, as was accepted by the Council at the Hearing Sessions, and now accepted within ED44, then this point in itself justifies more than the 4.4 ha currently proposed should be allocated. However, coupled with all the other issues raised with regard to matching supply and demand for employment land it is evident that insufficient land has been allocated. This means the Local Plan is not sound as it will not be effective in meeting NPPF requirements in this respect.

3. Proposed Site Allocation S76 and MOL Considerations

3.1 Notwithstanding the issue raised with regard to sources of industrial land supply and insufficient land being allocated – there is agreement between all parties that MOL land needs to be released to meet industrial land requirements. It is helpful that the Council have accepted the Inspector’s recommendation that they need to review the three parcels of land in the Local Plan Issues and Preferred Options Document (L.3.A) with possible future use options for industry:

- S76 ‘Land West of Beddington Lane (A)
- S77 Land West of Beddington Lane (B) – in the ownership of Cappagh
- S78 Land at Jessops Way – in the ownership of Cappagh

3.2 Whilst the Council state in ED44 (para 1.14) that these sites were not progressed in part because two of them were in the WVRP (S77 and S78) this is not reflected to any significant degree in the evidence base. The Council’s response to Inspector’s Initial Questions (ED21) states at para 1.1 that the Green Belt and MOL Consultation Update (L.13.D) provides the principal reasons why some of the Green Belt and MOL proposals in the Local Plan Issues and Options Document (L.3.J) were not taken forward. Para 1.5 of L.13.D confirms for both sites S77 and S78 that these sites were not progressed because: “The council considers this proposal is inappropriate development in Metropolitan Open Land”.

3.3 The Council have proposed to only release S76 and para 1.15 of ED44 sets out the reasons why they have taken this approach. It is considered that the approach taken is unsound, in MOL terms, having regard specifically to the guidance provided in the NPPF with regard to ensuring boundaries will endure for the plan period.

3.4 The following points are made in specific response the reasons set out at para 1.15 of ED44:

- Whilst S77 and S78 fall within the Wandle Valley Regional Park (WVRP) and S76 does not this cannot on its own form the key determinative factor which differentiates the sites. This is a hugely simplistic approach. There are other key considerations which are equally if not more important – and in particular those relating to creation of appropriate MOL boundaries. Notwithstanding, if ‘exceptional circumstances’ exist to justify release of MOL then they equally exist to justify release of land from the WVRP – both are strategic priorities in the London Plan. As has been detailed in the Cappagh Regulation 19 Response to Policy 24 Green Belt and MOL and Supporting Text (February 2017) whilst both S77 and S78 are within the WVRP: the two sites are in private ownership and there is no prospect that they would be made available as public open space and no prospect that they could form part of the WVRP in any functional sense. The sites perform very poorly when evaluated against the LPA’s own criteria for assessing the

extent which they perform an MOL function an which equally limits the extent to which they could contribute positively to the WVRP. Release of the two sites would in fact allow for more robust and defensible boundaries to be establish from the MOL and WVRP which would benefit the objectives of the development plan. Any planning application coming forward on the sites would no doubt need to provide appropriate boundary planting and screening potentially including bunding and would serve to provide a visual improvement on the current status of the two sites.

As noted at the Hearing Sessions, and given the reference by the Council to WVRP and references to it in the London Plan it is relevant that at Issues and Options Stage, when these sites were being considered for release, the GLA did not object.

- S78 is a local go karting facility rather than one serving the 'whole' or 'significant' parts of London and its loss to industrial purposes should be seen as being in planning terms more preferable than the loss of MOL land which currently has no use, structures or activity on it. This site is notably different in this respect from the other two sites. It benefits from existing boundary planting and bunding and its location immediately adjacent the SIL with shared access from with units within the existing SIL would support its release by comparison to site S76.
- If S77 were released – a WVRP frontage to Beddington Lane would still remain on land north of S76. If S76 were not released this would also further retain a WVRP frontage by virtue of views into WVRP and along Beddington to land north of it. If retaining frontage along Beddington Lane is genuinely being relied upon by the Council as a determining criteria then this clearly supports the release of S78 – given it has no frontage to Beddington Lane at all.
- The construction of the ERF immediately to the west of S76 and S77 has significantly weakened the MOL function. However, as has been detailed in previous evidence provided which the Council have overlooked, the approved plans for the ERF require that the existing access road which runs through Site S77 be removed and reinstated and seeded with species rich grass mix. The approved illustrative planting plan which accompanied the ERF application is attached at Appendix 3. A submission to discharge Condition 5 Landscaping was made in May 2014 (approved in January 2015). The relevant approved structural planting plan is attached at Appendix 4 (again showing the access currently running through S77 "as a proposed species rich grass mix area"). The omission of consideration of this point is relevant to the Council's consideration of Site S76 in the very special circumstances section of ED44 (para 1.21)

- The release of S76 on its own does not accord with the Inspector's advice at ED42 (para 10) that for the plan to be found sound that specific allocations are required to deal with shortfall of at least 5 ha. S76 is only 4.4 ha and due to its location immediately adjacent to surrounding MOL and WVRP the likelihood that it can be developed as intensively as a 4.4ha site located within the main area of the SIL is a key consideration. Moreover, as detailed in earlier sections of this statement, the council's evidence to support the contention that allocating S76 along with other sources of supply can provide sufficient industrial floorspace has been shown not to be robust.

3.5 Table 3 is considered to be a very narrow and simplistic analysis of the three sites and completely avoids dealing with, and is therefore not in conformity with, NPPF guidance at para 83 (and Inspector's advice) that the LPA should be seeking in the Local Plan to establish boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period. Para 85 of the NPPF expands on this point further – requiring that LPA's define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

3.6 S76 is notably also different to S77 and S78 in that it has no direct boundary with the existing SIL. It is divorced from the SIL to the east by Beddington Lane, to the south by the S77 site currently MOL and to the north by further open land allocated as MOL, to the west by the ERF but which is nonetheless in MOL land. It cannot be considered to form a natural extension to the existing defined SIL area. By comparison both S76 and S78 have site boundaries which directly abut the existing SIL boundary and would form clear and natural extensions to the defined SIL and are able to provide clear, defensible boundaries which will endure for the plan period and have clear regard to recognisable physical features.

Council's Exceptional Circumstances For Releasing MOL

3.7 The Council have identified exceptional circumstances for releasing MOL – and specifically S76. In this context the following specific points of comment/objection are raised:

- We are fully in agreement that given the Inspector's conclusion in ED42 that the intensification of the Beddington SIL will not deliver sufficient floorspace and there is a shortage of industrial land in the borough to meet need. The Council's other two SILS, Kimpton and Imperial Way, do not have capacity to intensify nor do the council's EIL. In the absence of any other sites it is necessary to allocate land at the Beddington SIL.
- Where we disagree entirely is in the selection of S76 as the most appropriate site for release this is for two key reasons:

i) It is below the amount of land identified by the Inspector required to be allocated as a minimum. Albeit the evidence supports a greater level needs to be allocated. Based on this it is evident that allocations involving some combination of the three sites to ensure at least 5 ha is provided is required. If it is only proposed to bring forward one site providing only 4.4 ha (and coupled with comments made in previous reps and within this statement) the Plan cannot be considered sound as it will not meet NPPF requirements.

ii) S76 does not in isolation form a natural extension to the SIL. It will leave S77 as a marooned, isolated island site surrounded by SIL on three sides with the ERF to the rear. There are clear MOL boundary considerations which justify the release of S77 now, even more so if S76 is proposed for release, to ensure compliance with the NPPF guidance at para 83 and 85.

- It is agreed that the evidence submitted by Cappagh and others clearly demonstrated the very limited scope for Sutton's industrial demand to be accommodated by neighbouring boroughs.

- It is agreed that the provision of additional industrial floorspace will contribute to the wider regeneration of Beddington SIL and deliver jobs for borough residents which may reduce the need for out commuting. However, the key benefit or exceptional circumstances which more critically arises from the provision of additional industrial floorspace is the ability to address the identified need for local business to expand and the locational requirements of new businesses wanting to come into Sutton. This is particularly with regard to those sectors that have a reliance, need and dependence on a London Location (Cappagh Hearing Statement Issue 5/Policy 14 paras – 1.7-1.15).

- Issues have been raised above with regards to the access road currently within site S76 (to be reinstated to grass) and the location of the new access road. In this context the allocation of site S76 in isolation cannot on any reasonable basis be considered to be sound given the NPPF guidance on how MOL boundaries should be set.

4. Exceptional Circumstances for Releasing S77 and S78

4.1 Submissions made on behalf of Cappagh to the Issues and Options and Submission Draft Plan have addressed in detail the extent to which the two Cappagh sites are performing poorly in MOL terms and provided photographs, annotated aerial images and descriptions of the two sites in terms of the existing use and surrounding physical features. With specific regard to the issue of setting appropriate boundaries which will endure for the plan period and have regard to physical features (mindful of the guidance of the NPPF and considerations of soundness) the following points are important to highlight again:

- S77 Land West of Beddington Lane (B): there are a range of physical features to which regard should have been had in defining the MOL boundary in this area.

- (i) The ERF Access road (forming the northern boundary of Cappagh site S77) - which includes 10m high lighting columns, extensive new planting along the full extent of the southern edge, retention of existing palisade fencing, provision of entry gates at north eastern end, provision of weighbridge and associated structures at north-western end, as well as significant activity in the form of circa 666 operational lorry movements per day (ERF Committee Report – para 6.32).
- (ii) Retained Gas plant compound to western boundary of Cappagh site, proposed woodland planting along same boundary, together with bunding on western edges of ERF and other retained structures (See ERF Full Site Restoration Plan, Extract for EIA attached at Appendix 2 to Cappagh Hearing Statement Issue 10/Policy 24).
- (iii) Pylons overshadow the site on the western boundary.
- (iv) Southern boundary immediately abuts the currently defined Beddington SIL and extensive large span warehouse structures.
- (v) Eastern boundary formed by Beddington Lane and opposite to that the remainder of the Beddington SIL.
- (vi) In particular by reference to the structural and significant planting which will/does surround the northern and western boundary of the site, and are permanent features to be retained, together with the existing relationship with the SIL on the eastern and southern boundary it is clear that the MOL boundaries if they are to be appropriately defined to be defensible and permanent should reflect these and be drawn to exclude Site S77 from MOL.

➤ S78 Land at Jessops Way: There are a range of physical features to which regard should have been had in defining the MOL boundary in this area:

- (i) The site is already in active use as Go Kart facility with tracks and structures on site, bunding and planting around the site, and boundary fencing – which define and separate it from the remainder of Beddington Farmlands and the MOL – both functionally and visually.
- (ii) Critically the land immediately abuts the SIL characterised by large scale buildings adjoining the site to the east and north east (other side of the railway line).
- (iii) These features form clear, easily definable, defensible and obvious location to draw the MOL boundary – which should have been amended to exclude Site S78 from MOL.

4.2 The poor MOL function of S77 and S78 together with the exceptional circumstances to which we have indicated we are agreement with in the Council's ED42 and the following key considerations comprise the full suite of exceptional circumstances which support the release of S77 and S78 sites from MOL:

- Both sites are located immediately adjacent to existing SIL and would form a true natural extension;
- The resulting MOL boundaries would be clear, defensible, pay due regard to existing physical features and be likely to endure for the plan period;
- Release of the two sites would allow them to contribute more positively to the remaining MOL and WVRP;
- Both sites are located adjacent or near to new significant industrial development;
- There is an identified need to allocate new employment floorspace which it has been demonstrated will not be met by the current policy approach put forward (i.e. intensification);
- The policy approach for intensification has already been in place of all of the previous plan period (Dec 2009 – date) with limited success;
- There is limited scope for demand to be absorbed by adjoining or nearby boroughs;
- Not releasing land from MOL and failure to allocate new industrial land will mean that the plan will not be able to meet stated objectives nor the requirements of the NPPF in terms of sustainable development and economic growth.

4.3 It is considered that both sites are better options in MOL and NPPF terms than S76 and if both came forward would meet the Inspectors at minimum requirement.

4.4 Notwithstanding the above, if it is ultimately considered that S76 should come forward then for that allocation to be considered sound (in accordance with the NPPF with regard to MOL boundaries and requirements to support sustainable development and economic growth) then the only way this can be achieved is by jointly allocating S77 with S76 as SIL.

5. Summary of Reasons why the Submission Draft Sutton Local Plan, with Main Modification, Remains Unsound

5.1 Detailed reasons as to why the Plan was considered unsound were set out in the Cappagh Hearing Statements for Issue 5/Policy 14 and Issue 10/Policy 24. These have been reviewed and refined having now considered the proposed Main Modifications and in light of the points detailed within this statement.

5.2 On this basis the failure to allocate at least 5 ha of additional land for industrial purposes (albeit it is considered significantly more than this is required) and the failure to allocate S77 and S78 for these purposes within MM55, MM56, MM78, MM79 and MM132 makes the Plan unsound for the following reasons:

- It has not been **Positively Prepared**

☒ The strategy does not seek to meet objectively assessed development requirements – the LPA’s own evidence base identifies a need to provide additional industrial land – which on a conservative basis equates to 10.1 h of industrial land required – but could in fact be much higher – particularly if loss of employment land is fully taken into account and/or different growth rate assumptions are applied, that better reflect business requirements. The requirement for new industrial land is further evidence by local businesses who are specifically looking for a Sutton location to accommodate new and existing business requirements and who have found it extremely challenging to secure land for these purposes.

- It is not **justified**:

☒ The approach is not the most appropriate strategy when considered against the reasonable alternatives which comprises a restrained release of MOL for allocation as new industrial floorspace immediately adjoining the existing Beddington SIL. This release being further justified by releasing MOL land which has been assessed as performing poorly in terms of its MOL function. This is the only realistic means in which land will be secured in the short term for new industrial development – which is needed now. Indeed, it is likely to be the only reliable means of securing appropriate levels of industrial land supply for the longer term as well. The LPA’s evidence base does not provide any justification to support the ability of adjoining London Boroughs/or boroughs adjoining south London to absorb overspill of industrial land demand, and this has now been accepted in the council’s ED44 statement. Nonetheless, too much reliance is still being place on a policy of intensification which will fail to provide the additional floorspace requirements.

☒ Purely in MOL terms the LPA’s own evidence base indicates that Sites S77 and 78 are performing badly. This is underpinned by our own further assessment both at Issues and Options Stage and again as provided at Appendix 1 to the Cappagh Hearing Statement for Issue 10/Policy 24. Release of sites S77 and S78 from MOL would secure more robust and defensible boundaries. The approach of retaining poorly performing MOL land, particularly when it is required for alternative uses, is not justified. This together with the evidence supporting the requirement for new land to be allocated as SIL provides the very special circumstances which justify release of the sites and allocation for industrial uses as part of the Local Plan process;

- It is not **effective**:

☒ The plan in its current form is not deliverable in terms of facilitating industrial land supply; it is not formulated on a basis that will allow it to effectively meet employment and particularly industrial land requirements within the Borough. It is not simply a matter of providing local employment – for the policy to be effective it must also take into account the ability to respond to businesses expansion and locational requirements. This has not been effectively taken into account and the Plan will not be able to meet Strategic Objectives 8 or 9 of the Local Plan. Nor does it meet related NPPF requirements as detailed below;

				<p>☒ Retention of poorly performing MOL land will not contribute effectively to meeting strategic objectives of protecting the open feel of the borough. Similarly, retention of WVRP land which has no prospect of offering public access or contributing in any functional sense cannot contribute effectively to local plan objectives. In terms of effectiveness – release of the two sites from MOL/WVRP designation and allocation for industrial purposes will have the effect of increasing the extent to which the sites can contribute positively to the remaining MOL/WVRP area as compared to the current situation. Any planning application coming forward would no doubt need to demonstrate design, layout, landscaping and bunding proposals which ensure that the development contributes positively to the surrounding MOL and WVRP area. Indeed, this should be required by the allocation in the Local Plan. Not releasing the sites will mean that they will simply continue to perform badly in MOL terms and fail to contribute to achieving the strategic objectives in terms of WVRP;</p> <p>• It is not consistent with national policy:</p> <p>☒ Failure to properly provide for industrial land requirements will mean that businesses will need to locate further away from the areas and markets they want to serve which is not sustainable in terms of trip generation, and does not meet the specific locational requirements of certain industrial businesses nor indeed expansion requirements of existing business and as such does not meet the NPPF requirement to support sustainable development and economic growth;</p> <p>☒ In terms of the NPPF guidance provided for drawing up, reviewing and defining Green Belt/MOL boundaries. The LPA in undertaking their GB/MOL review as part of the Local Plan and indeed in consideration of the proposed Main Modifications have failed to consider proposed boundaries appropriately having regard to their intended permanence in the long term, so that they are capable of enduring beyond the plan period. They have not considered boundaries in terms of ensuring they are defined by physical features that are readily recognisable and likely to be permanent. Further, insufficient regard has not been had to the other exceptional circumstances which support the release of sites S77 and S78.</p> <p>5.3 The areas where the Plan has been identified as unsound above can be relatively easily remedied by releasing both S77 and S78. However, as a minimum, if S76 is to be released for the Plan to be found sound this can only be the case if it is released in conjunction with S77 both in industrial land supply, economic growth and sustainable development terms and in terms of MOL boundary considerations.</p> <p><i>[Council Note: Representations includes four appendices. There are not reproduced here but have been sent to the Inspector]</i></p>
58	14	Mr Stuart Mills Iceni for SEGRO	General Comment	<p>1.1 On behalf of our client, SEGRO, we set out below our comments on the London Borough of Sutton’s proposed Main Modifications to the draft Local Plan as set out in the documents published for consultation in November 2017. These comments build upon the representations we have made to date and the matters discussed at the Examination Hearing Sessions.</p> <p>1.2 We broadly support the proposed amendments to the Local Plan discussed below, which we consider are necessary in order to ensure the Plan is sound, having regard to the requirements of paragraph 182 of the National Planning Policy Framework (NPPF), and address our previous objections. In particular, we strongly support the intention to allocate the land to the west of Beddington Lane (Site Allocation S76) for employment uses, which we consider to be necessary in order to meet the Borough’s identified employment needs.</p> <p>1.3 We provide our comments below on the soundness of the specific amendments which relate to the matters we have previously raised. In particular, this response deals with the proposed Main Modifications relating to Policies 1, 14, 24 and 40.</p>
66	14	Mr Stuart Mills Iceni for SEGRO	Conclusions	<p>3.1 We have set out above, on behalf of our client, our comments on the proposed Main Modifications as set out by the London Borough of Sutton in the documents published for consultation in November 2017. These comments build upon the representations we have made to date and the matters discussed at the Examination Hearing Sessions.</p> <p>3.2 We broadly support the proposed amendments to the Local Plan discussed above, and in particular we strongly support the intention to allocate the land west of Beddington Lane for employment uses (at Policy 40 – Site S76).</p> <p>3.3 We trust our comments will be taken into account as the Local Plan is finalised, and look forward to receiving further updates on the progress of the Plan in due course.</p>

80	17	Ms Katherine Harrison Surrey County Council	General Comments	<p>The focus of our concern is related to the potential transport impacts of the proposed London Cancer Hub on Surrey. As we stated in our initial response to the Local Plan and have reiterated throughout our engagement with your council, we fully support the scheme but we maintain that insufficient transport impact assessment work has been carried out to establish what impact this proposed large scale development is likely to have on Surrey and whether these impacts can be mitigated. In addition, we would seek to ensure that any measure required to be taken to mitigate the impacts of the London Cancer Hub on Surrey are funded by the developer and not by Surrey residents.</p> <p>Our comments relate to the following modifications: MM2 - Objective 15 MM12 Policy 2 MM15 Paragraph 2.14 MM16 Paragraph 214a We would also reiterate our comments on Policy 35</p> <p>The above modifications, in our view, do not serve to sufficiently resolve our issues as they do not entirely serve to demonstrate that the scheme is justified as the most appropriate strategy, given the lack of evidence to indicate that the transport impacts on Surrey can be feasibly mitigated.</p> <p>We understand that the London Borough of Sutton’s position is that the proposal for the LCH is insufficiently refined to further assess the impacts of development, beyond the work undertaken by the consultants WSP. We have expressed serious concerns regarding the assumptions used and the conclusion reached in the WSP work. We therefore consider it reasonable for the county council, in the absence of more appropriate and detailed assessment work, to be assured that any mitigation measures, reasonably required to resolve the impacts of the LCH on Surrey, will be delivered as part of the development. We consider it essential for such an assurance to be clearly stated in policy and not just included in the supporting text. Our comments, in response to each of the modifications of concern to us, are set out under relevant headings below.</p>
85	18	Mr Mark Berry Epsom & Ewell Borough Council	General Comments	<p>Thank you for providing the Borough Council with an opportunity to respond to the London Borough of Sutton Draft Local Plan 2016 – 2031 Main Modifications Consultation. The Borough Council remains broadly supportive of the approach proposed under the draft Local Plan. We continue to highlight our support in principle to the proposed regeneration of the healthcare uses at the Royal Marsden Hospital site. However, we continue to highlight our concern about the scale of growth proposed for Sutton Town Centre, as in our view that there is no certainty of any infrastructure improvements being delivered during the plan period. In addition, we support and share the concerns raised by Surrey County Council and Reigate & Banstead Borough Council in relation to the potential transport impacts of the proposed London Cancer Hub on Surrey.</p> <p>Our comments relate to the following modifications: MM2 Objective 15 MM12-Policy 2 MM15-Paragraph 2.14 MM16-Paragraph 2.14a MM27-Policy 4 1st paragraph MM28-Policy 4A AM98-STC25:6th bullet</p> <p>The above modifications, in our view, do not serve to sufficiently resolve our issues, identified in the Inspector’s Issue and Questions under Issue 6: London Cancer Hub and Tramlink and Major Transport Proposals.</p>

9	8	The Mayor Of London	MM1	<p>The Mayor objects strongly to the inclusion of the additional wording “and make a positive contribution to meeting housing needs across the wider area of south west London and adjoining parts of Surrey”.</p> <p>London has always been seen as a single housing market, and this has been accepted by previous Planning Inspectors who have examined previous iterations of the London Plan. This is also reflected in the Government’s consultation paper “Planning for the right homes in the right places” at paragraph 30 which states “strategic plans prepared by the Mayor of London...will use the proposed approach to produce a single assessment of the housing need for the area as a whole” and paragraph 33 which states the Mayor of London’s Spatial Development Strategy sets a London-wide housing target that is broken down to a minimum housing target for individual boroughs.</p> <p>Therefore, it is the role of the Mayor to identify and address housing need for London and allocate housing targets based on the Strategic Housing Land Availability Assessment 2017 (SHLAA) process which has been produced in collaboration with all London boroughs based on land availability.</p> <p>London has no agreement with Surrey to meet its housing needs and Surrey has not requested the Mayor’s help in meeting its own housing target. The proposed wording undermines the principle of London as a single housing market, and the role of the Mayor in setting housing targets within London and is therefore not in conformity with the London Plan.</p>
10	8	The Mayor Of London	MM2	<p>Whilst TfL does not object in principle to proposals for improvements to the road network (as identified in Policy 35), the wording in MM2 should be qualified by inserting ‘<i>where necessary</i>’. The objectives of the plan should focus on improvements to public transport, walking and cycling as the main priorities. Proposals will be subject to detailed design and modelling, and will be assessed for compliance with the Mayor’s Healthy Streets Approach in line with the draft Mayor’s Transport Strategy and London Plan. This should be made clear through inserting additional explanatory text following objective 15.</p>
67	15	Ms Sarah Hoad Transport for London	MM2	<p>TfL is concerned with the proposed wording in MM2. The specific inclusion of a ‘road improvement’ objective in the strategic policies (replicated throughout the Plan) could, without careful caveat, be interpreted as supporting strategic road capacity expansion. This could undermine other policies in the Plan to encourage mode shift to public transport, walking and cycling (London Plan policy 6.1 and draft new London Plan policy T1A). As such, TfL recommend that ‘road improvements’ are not a strategic objective, but could be, if required, mentioned in appropriate specific (but non strategic) policies. Policy 36 (Transport Impact) could be a more appropriate location for this wording.</p> <p>In any event, especially if the proposed modification is retained, it should be qualified by inserting ‘where necessary and appropriate’. Any road improvement proposals will be subject to detailed design and modelling, and will be assessed for compliance with the Mayor’s Healthy Streets Approach. This should be made clear through inserting additional explanatory text following objective 15, or where the text is moved to.</p>
81	17	Ms Katherine Harrison Surrey County Council	MM2	<p>The modification proposed to Objective 15 is in accordance with the representations made by Reigate and Banstead Borough Council but as the highway authority, we consider that the Objective needs to be amended to make it clearer that the scope includes cross boundary impacts as follows:</p> <p>“To improve public transport within the borough and secure improvements to the road network to address the local and cross boundary impacts of new development.”</p>
86	18	Mr Mark Berry Epsom & Ewell Borough Council	MM2	<p>London Cancer Hub:</p> <p>We share Surrey County Council as local highway authority concern that the proposed modifications to the plan do not demonstrate that the scheme for the London Cancer Hub is justified as the most appropriate strategy. This is because of the lack of evidence to indicate that the transport impacts on Surrey can be mitigated. We support and endorse the representations made by Surrey County Council to this consultation in relation to MM2 Objective 15, MM12 Policy 2, MM15-Paragraph 2.14 & MM16-Paragraph 2.14a.</p>

59	14	Mr Stuart Mills Iceni for SEGRO	MM7	<p>2.1 We object to the proposed modifications to Policy 1(f) as set out in MM7, as it omits any reference to deleting the following text: “...introduce a job density floor to ensure new industrial floorspace is used efficiently...”</p> <p>2.2 As set out within our previous representations on Policy 1, the proposed minimum employment density of 1 person per 60 sqm of floorspace suggested by the Council within the Proposed Submission (Regulation 19) consultation draft of the Local Plan would not be justified or effective in terms of delivering the additional industrial land required in the Borough. The arbitrary employment density figure previously proposed would prevent new and existing businesses from creating or extending their operations in the Borough, and would also be unenforceable. As such, for the reasons we have set out previously, we consider that the introduction of a “job density floor” would be unsound, having regard to the requirements of paragraph 182 of the NPPF.</p> <p>2.3 We note that this issue was specifically raised by the Inspector within his post-Hearings advice letter to the Council dated 19 October 2017 (ED42), in which he indicated that the proposed employment density requirement would be “neither justified nor effective” and thus recommended that it be removed.</p> <p>2.4 The Council is proposing to remove the employment density requirement from Policy 14(a) (MM55 & MM56) in accordance with the Inspector’s recommendations, and as such, we assume the continued reference to a “job density floor” in Policy 1(f) is simply an oversight. Nonetheless, we strongly encourage the Council to remove this reference to job density requirements within Policy 1(f) in order to ensure consistency with MM55 & MM56 and to make Policy 1 sound.</p>
82	17	Ms Katherine Harrison Surrey County Council	MM12	<p>The county council maintains that this policy should include a clear commitment for appropriate transport interventions and any mitigation measures to be funded by the developer. We furthermore consider that development should be contingent on achieving good sustainable transport options. To address these points, we maintain that the policy should be further modified to include the following wording:</p> <p><u>Proposals for new development must reduce reliance on the private car and encourage other modes and include any necessary mitigation measures required as a result of development, to be funded by the developer, to ensure the continued safe and efficient operation of the strategic and local road networks.</u></p> <p>Whilst the modification requiring transport assessments and travel plans is welcomed, there remains no assurance that any transport interventions and mitigation measures required outside the borough will be addressed. We therefore maintain that the policy should be further modified to include reference to interventions and mitigation outside the borough as follows:</p> <p><u>Each 'development wave' will only be occupied once the appropriate necessary transport interventions, including any outside the borough, have been implemented, unless equivalent means of alternative mitigation have been identified and implemented. A full transport assessment and travel plan will be required to accompany any planning applications for the development of all or any part of the site.[MM12]</u></p> <p>MM15 Paragraph</p>
87	18	Mr Mark Berry Epsom & Ewell Borough Council	MM12	<p>London Cancer Hub: We share Surrey County Council as local highway authority concern that the proposed modifications to the plan do not demonstrate that the scheme for the London Cancer Hub is justified as the most appropriate strategy. This is because of the lack of evidence to indicate that the transport impacts on Surrey can be mitigated. We support and endorse the representations made by Surrey County Council to this consultation in relation to MM2 Objective 15, MM12 Policy 2, MM15-Paragraph 2.14 & MM16-Paragraph 2.14a.</p>
11	8	The Mayor Of London	MM15	<p>Supported, and the wording should be amended as follows: <i>“Travel Plans for the various different users on the site will be required to encourage the use of sustainable modes of travel”.</i></p>

68	15	Ms Sarah Hoad Transport for London	MM15	<p>The additional text included in paragraph 2.14 (MM15) is supported, although the wording should be amended as follows; “Travel Plans for the various different users on the site will be required to encourage the use of sustainable modes of travel”. This will ensure full compliance with policy 6.3 of the current London Plan (policy T4 of the draft new London Plan).</p> <p>Further assessment will be required to understand the development impacts as suggested in the amendment to paragraph 2.14a (MM16), and as noted in TfL’s previous comments (dated 10th February 2017), a mitigation package will be required which includes improvements to bus services. Reference to the enhancements to local bus services to serve the proposed new secondary school, in Wave 0 of the transport improvements (MM17) is supported by TfL.</p>
83	17	Ms Katherine Harrison Surrey County Council	MM15	We support the modified text at para 2.14 requiring a full transport assessment as described to accompany any planning application submitted for the proposed London Cancer Hub development. We consider that it should state: travel plans “ <u>will be</u> ” required rather than “likely to be” required this is consistent with the MM12.
88	18	Mr Mark Berry Epsom & Ewell Borough Council	MM15	<p>London Cancer Hub:</p> <p>We share Surrey County Council as local highway authority concern that the proposed modifications to the plan do not demonstrate that the scheme for the London Cancer Hub is justified as the most appropriate strategy. This is because of the lack of evidence to indicate that the transport impacts on Surrey can be mitigated. We support and endorse the representations made by Surrey County Council to this consultation in relation to MM2 Objective 15, MM12 Policy 2, MM15-Paragraph 2.14 & MM16-Paragraph 2.14a.</p>
12	8	The Mayor Of London	MM16	It should be added here that site specific mitigation will be required to deliver bus improvements to the London Cancer Hub.
84	17	Ms Katherine Harrison Surrey County Council	MM16	We support the modification of additional paragraph 2.14a, requiring further work to establish the location and scale of transport improvements to support the LCH proposals and also the commitment to joint working with the county council. However, we consider that the final sentence of the modification which reads: “in the context of the existing transport network and other development proposals” to be superfluous as the existing transport network and other development proposals will be considered as a matter of course as part of the transport assessment work. We therefore suggest this should be removed.
89	18	Mr Mark Berry Epsom & Ewell Borough Council	MM16	<p>London Cancer Hub:</p> <p>We share Surrey County Council as local highway authority concern that the proposed modifications to the plan do not demonstrate that the scheme for the London Cancer Hub is justified as the most appropriate strategy. This is because of the lack of evidence to indicate that the transport impacts on Surrey can be mitigated. We support and endorse the representations made by Surrey County Council to this consultation in relation to MM2 Objective 15, MM12 Policy 2, MM15-Paragraph 2.14 & MM16-Paragraph 2.14a.</p>
13	8	The Mayor Of London	MM17	Reference to enhancements to local bus services is supported by TfL as a response to our previous comments.
49	11	Ms Katharine Fletcher Historic England	MM18	We are particularly pleased with the reference to Sutton's Heritage Action Zone in Policy 3a.
14	8	The Mayor Of London	MM19	The findings of the latest Strategic Housing Market Assessment 2017 (SHMA) demonstrate there is a significant need in London for one-bedroomed market, intermediate and low-cost rental housing (55%). Therefore, the Mayor would support the deletion of the text following “a range of tenures and dwellings sizes” and does not consider the additional text “All development...for family housing” necessary.

54	13	Mr Charlie Mansell Sutton & Cheam Labour Party	MM19	<p><i>General Comments</i></p> <p>We object to "The council will also investigate the feasibility of the redevelopment of the following estates: Chaucer Estate, Benhill Estate, Rosebery Gardens, Collingwood Estate, and Sutton Court.", because the Council is fully aware the Mayor of London will be expecting it to more fully consult residents and has not mentioned this. In order to reflect good practice the Council should refer to the Mayor's emerging policy here https://www.london.gov.uk/what-wedo/housing-and-land/improving-quality/good-practice-guide-estate-regeneration On top of that this policy should not be adopted without pre-consultation of residents plus any actual changes should be subject to a full tenant and leaseholder ballot. This is a sensitive matter as it relates to people's homes and it is in everyone's interest that this is not just printed word, but also a sensitive debate which both sides clarify their positions over the future of these sites.</p> <p><i>Is the modification positively prepared?</i></p> <p>The modification does not contain good guidance on current housing regeneration good practice</p> <p><i>Is the modification robust (based on evidence)? Is the modification effective (deliverable)?</i></p> <p>The modification is not based on any evidence as local residents on these estates have not been consulted about the future of their homes. It may not be deliverable as it is dependent on transport improvements such as a Tramlink extension, which the proposal actually admits and there is no evidence this is going to happen for quite a while, so it should not be included in the Local Plan at this stage</p> <p><i>Is the modification consistent with national planning policy?</i></p> <p>The modification is not in line with mayoral policy on the use of land and proper resident consultation over it</p>
15	8	The Mayor Of London	MM24	The aspiration to reduce traffic domination is supported. TfL are in discussions with the Council to support future transport improvements.
69	15	Ms Sarah Hoad Transport for London	MM24	With regards to MM24, the aspiration to reduce traffic domination is supported. TfL are in discussions with the Council to support future transport improvements, including those within Sutton Town Centre (MM135). All transport proposals will be subject to detailed assessment and modelling, and in line with the draft new London Plan policy T2, are likely to be assessed for compliance with the Healthy Streets Approach.
90	18	Mr Mark Berry	MM27	<p>Tramlink and Major Transport Proposal: MM27-Policy 4 1st paragraph, MM28-Policy 4A & AM98-STC25:6th bullet</p> <p>We note the proposed modifications to the above, including the introduction of a policy hook for the future safeguarding of land for the Tramlink if necessary. However, we remain of the view that there is significant uncertainty over the delivery of proposed Tramlink within the plan period. In our view this has not been sufficiently addressed through the proposed modifications. We are concerned as to the implications of the growth predicated on its delivery and the suitability of a 'Plan B'. For the benefit of industry, residents as well as neighbouring and surrounding authorities. We call for the Local Plan to provide a greater level of certainty to how this infrastructure requirement could be achieved.</p>
91	18	Mr Mark Berry	MM28	<p>Tramlink and Major Transport Proposal: MM27-Policy 4 1st paragraph, MM28-Policy 4A & AM98-STC25:6th bullet</p> <p>We note the proposed modifications to the above, including the introduction of a policy hook for the future safeguarding of land for the Tramlink if necessary. However, we remain of the view that there is significant uncertainty over the delivery of proposed Tramlink within the plan period. In our view this has not been sufficiently addressed through the proposed modifications. We are concerned as to the implications of the growth predicated on its delivery and the suitability of a 'Plan B'. For the benefit of industry, residents as well as neighbouring and surrounding authorities. We call for the Local Plan to provide a greater level of certainty to how this infrastructure requirement could be achieved.</p>
16	8	The Mayor Of London	MM29	The Mayor objects to the proposed designation of Land to the West of Beddington Lane (Site Allocation S76) as an extension to the Beddington Strategic Industrial Location (SIL). The Land to the West of Beddington Lane is currently designated as Metropolitan Open Land (MOL) which is afforded the strongest protection in the London Plan and is given the same level of protection as Green Belt land. The proposed designation of the land as SIL would have an adverse impact on the openness of the existing MOL and is not in conformity with the London Plan.

40	10	Mr Alec Arroll Savills for Thames Water	MM29	This modification brings into affect the designation of site S76 as an extension to Beddington SIL within Policy 5: Wandle Valley Renewal. Kennet Properties supports this modification and considers it necessary in order to make the Local Plan sound. As explained above, the allocation of the site is required to meet Sutton's objectively assessed need; it is the most appropriate strategy having considered reasonable alternatives, it is deliverable; and it is consistent with national policy.
78	17	Ms Katherine Harrison	MM29	Thank you for notifying Surrey County Council of the Main Modifications to the Sutton Local Plan. As the mineral and waste planning authority for Surrey we support the wording of MM29 and MM132
41	10	Mr Alec Arroll Savills for Thames Water	MM34	This modification graphically shows S76 as being now included as "New or Improved Employment Areas" rather than MOL. Kennet Properties supports this modification and considers it necessary in order to make the Local Plan sound. This ensures consistency with Main Modification 29.
17	8	The Mayor Of London	MM35	For information, the draft new London Plan does not contain a density matrix.
18	8	The Mayor Of London	MM36	The Mayor objects to the proposed deletions. The SHLAA 2017 models a capacity for development on small sites for 24,500 new homes a year across London. The draft London Plan contains a small sites policy (H2) with a presumption in favour of small housing developments of 1 – 25 units on sites of less than 0.25 hectares as well as a small sites target for each borough. In Sutton's case, the small sites target is 738 homes per annum. The Mayor also supports contributions towards affordable housing from schemes with 10 units or fewer (see comments on MM37).
19	8	The Mayor Of London	MM37	The Mayor objects to the deletion of a 50% overall borough-wide target which is considered to be in conformity with the draft London Plan. The Mayor's Affordable Housing and Viability SPG and draft affordable housing policy (H5 Delivering affordable housing) require a strategic target of 50% for all new homes to be delivered across London to be affordable. In addition, the Mayor's draft Housing Strategy for delivering homes in London sets a strategic target of 50% affordable housing for London, and demonstrates how this target will be delivered in London using the Mayor's funding and wider powers. The Mayor objects to the deletion of ii). The London Plan, which has been through examination, allows for contributions towards affordable housing to be made on sites with 10 units or fewer and therefore the draft policy is in conformity with the London Plan. The Mayor would support a minimum of 35% affordable on residential and mixed-use schemes in line with draft London Plan policy H6 Threshold approach to applications which advocates a threshold approach as detailed in the Mayor's Affordable Housing and Viability SPG. The addition of "without grant" should be included in the wording.
20	8	The Mayor Of London	MM41	The reference to the Mayor's Affordable Housing and Viability SPG is welcomed.
21	8	The Mayor Of London	MM48	The Mayor objects to removal of (i). Draft London Plan Policy H15 Specialist older person's housing A 2) requires account to be taken of the need for sites to be well-connected in terms of contributing to an inclusive neighbourhood, access to social infrastructure, health care and public transport facilities. GLA officers would be happy to provide alternative wording if required.
22	8	The Mayor Of London	MM50	The Mayor supports the proposed modification. It should be noted that the Mayor has adopted a new definition for Gypsies and Travellers in the draft London Plan Policy H16 Gypsy and Traveller accommodation which supports Sutton's approach to considering the accommodation needs of Gypsies and Travellers.

94	19	Cllr Richard Broadbent	MM54	what is the definition of 'critical drainage area' here, and how much of Nonsuch ward is affected?
60	14	Mr Stuart Mills Iceni for SEGRO	MM55	<p>2.5 For the reasons discussed above in relation to MM7, and as set out in further detail in our previous representations, we consider that the employment density requirement identified within the Proposed Submission (Regulation 19) consultation draft of the Local Plan was unjustified and ineffective, and thus unsound. We therefore strongly support the deletion of this reference as proposed by MM55, which we consider to be necessary in order to make the Plan sound.</p> <p>2.6 We also strongly support the additional reference proposed by MM55 within paragraph 14.2 to releasing land west of Beddington Lane to provide additional employment land. As discussed below and detailed within our previous representations, we consider that it is essential to the soundness of the Plan that the land promoted by our client to the west of Beddington Lane is released from the Metropolitan Open Land (MOL) designation and allocated for employment uses, in order to facilitate the intensification of Beddington Lane Strategic Industrial Location (SIL) and to meet the minimum requirement to deliver at least 10 Ha of additional industrial land as identified by Policy 1(e).</p>
23	8	The Mayor Of London	MM55 & MM56	The Mayor objects to the proposed designation of Land to the West of Beddington Lane (Site Allocation S76) as an extension to the Beddington Strategic Industrial Location (SIL). The Land to the West of Beddington Lane is currently designated as Metropolitan Open Land (MOL) which is afforded the strongest protection in the London Plan and is given the same level of protection as Green Belt land. The proposed designation of the land as SIL would have an adverse impact on the openness of the existing MOL and is not in conformity with the London Plan.
43	10	Mr Alec Arroll Savills for Thames Water	MM56	<p>Kennet Properties set out its concerns over the introduction of a job density requirement in its Hearing Statement on Issue 5 and at the Examination Hearing Sessions. We will therefore not repeat the concerns we have already detailed in full. However, in summary Kennet Properties concerns were that the policy requiring a job density of one job per 60m2 would in fact compound the barriers to intensification, would act as a disincentive to investment and would be difficult to enforce. Critically the job density proposed (1 job per 60m2) meant that it would only be office type developments that were likely to achieve the standard and would therefore undermine any attempt to redevelop and intensify Beddington SIL because no typical industrial use would ordinarily achieve such a density of employment. Kennet Properties therefore supports this modification and considers it necessary in order to make the Local Plan sound.</p> <p>This amendment also confirms the designation of S76 as an extension to Beddington SIL. For reasons set out above, Kennet Properties support this amendment and consider it necessary to make the Local Plan sound and consistent with Main Modifications 29 and 34.</p>
61	14	Mr Stuart Mills Iceni for SEGRO	MM56	<p>2.7 For the reasons discussed above and set out within our previous representations, we strongly support the proposed deletion of the reference to a minimum employment density figure within Policy 14(a), which we consider to be necessary in order to make the Policy justified and effective, and thus sound.</p> <p>2.8 We also strongly support the additional text now proposed at part (c) of the policy, reflecting the proposed allocation of the Land West of Beddington Lane (Site Allocation S76). As previously noted, we consider that the allocation of this land is essential in order to ensure the delivery of the additional 10 Ha of industrial land identified in Policy 1(e). As such, we consider this proposed modification to be necessary in order to make the Plan sound, in accordance with the Inspector's recommendations dated 19 October 2017 (ED42).</p>

4	4	Mr David Jones Planware Ltd	Policy 18 Part E <i>[not related to any MM in Council's view]</i>	<p>1. Introduction</p> <p>1.1 We have considered the above policy and its supporting text with regard to the principles set out within the Framework. Local Plans should “plan” positively for development; be justified; effective; and consistent with the Framework.</p> <p>1.2 We consider that limiting the concentration of hot food takeaways would be unsound.</p> <p>2. Such an approach is not positive, justified, effective or consistent with the Framework.</p> <p>2.1 Restricting the concentration of new A5 proposals within the borough is not a positive approach to planning. The Framework “foreword” sustainable development is about positive growth, making economic; environmental; and social progress, for this and future generations.</p> <p>2.2 The suggested restrictions would apply an over-generic approach to restrict development with little sound planning reasoning or planning justification. This is contrary to Para 14 of the Framework which advises authorities to positively seek opportunities to meet development needs of their area.</p> <p>2.3 Thus it is inconsistent with Para 19 and 21 of the Framework. Para 19 states: Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore significant weight should be placed on the need to support economic growth through the planning system.</p> <p>2.4 Para 21 states: <i>Investment in business should not be over-burdened by the combined requirements of planning policy expectations.</i></p> <p>2.5 No consideration has been given to other A class uses and their potential impact on shopping parades. The suggest approach is therefore not holistic and will not achieve the principle aim.</p> <p>2.6 The Framework cannot be interpreted to provide generic restrictions on a particular use class. Moreover, no evidence supports such restrictions. The need for evidence is emphasised in para 158 of the Framework which states that each local plan should be based on adequate, up-to-date and relevant evidence. Compliance with the soundness test is still required.</p> <p>2.7 The proposal does not accord with the “golden thread” running through the Framework which seeks to build a strong competitive economy. Such a policy could potentially stifle economic development and is not consistent with the Framework.</p> <p>3. Soundness - summary</p> <p>3.1 We consider that restricting the concentration would be unsound and fails to meet the four tests of the Framework. It is not a positively approach to planning; justified; effective; or consistent with national planning policy. Such a policy should therefore not be taken forward to the next stage of the plan making process.</p> <p>4. Conclusion</p> <p>4.1 It has been highlighted above that there is no appropriate reason to restrict A5 uses by their concentration.</p> <p>4.2 It is unsound to introduce such a widespread land use policy to protect the amenity of such uses, which could be dealt with on a case by case basis via conditions</p> <p>4.3 The proposed approach in direct conflict with the Framework. The policy attempts to introduce a widespread land use restriction on a specific use class without providing any evidence of existing saturation levels of A5 uses within centres or shopping frontages.</p>
73	16	Mr Ray Liffen Carshalton-on-the-Hill Residents Association	MM75	Noted that the change from ‘or’ to ‘and’ has implications for any redevelopment of the Secombe Theatre, The Charles Cryer Theatre or the allington Hall, since all fall under the category ‘cultural’ as defined in the Glossary. For any of these to be redeveloped there would need to be “. . . a facility within easy walking distance or an alternative . . .”. The requirement for replacements is good news, but may not be what is intended in the policy.

98	20	Ms Vicky Aston Sport England	MM75	<p>Sport England supports the proposed change. However, Sport England objected to this policy as it was not considered to meet paragraph 74 with regard to the protection of community sports facilities. For example,. Sport England remains concerned that this policy does not adequately reflect the bullet points of paragraph 74 which apply to all built sports facilities (indoor and outdoor)';</p> <ul style="list-style-type: none"> - an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or - the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or - the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss. <p>The requirement to demonstrate 'that for a period of 12 months there had been no interest in using the premises land for their current use or other community purposes at a reasonable charge' will be difficult to give appropriate consideration to at the planning applications stage (and could put community facilities at risk) as if the facility has been closed down, the internal infrastructure may have been removed and it could no longer be feasible for the community to use it without significant upfront costs.</p> <p>Sport England is further concerned that the policy does not require applicants to provide a much more detailed assessment of the need for the type of facility that will be lost. Sports facilities can have very wide catchments so if for example, the loss of a sports hall is proposed and there is another sports hall within easy walking distance then the criteria would be fulfilled. However, there could be a need for both sports halls as together they may serve a much wider catchment area. Sport England's Facilities Planning Model (2017) indicates that there is existing unmet demand for sports halls within Sutton and that this demand may increase with the additional population proposed of the plan period and this would be exacerbated if this facility is lost. The policy does not currently require an appropriate assessment to be provided (as required by paragraph 74) and for this reason Sport England objected to the policy.</p> <p>Finally, Sport England suggests the following additional wording for the final paragraph; ...'or an alternative facility of equivalent or better provision in terms of quantity and quality will be provided within a similar distance.' Sport England would welcome the opportunity to discuss this further if the Council or the Planning Inspector requires further information. As an alternative, to satisfy our concerns, the following text could be included within the policy; 'Proposals affecting sports and recreational buildings will also be subject to the policy tests set out in paragraph 74 of the National Planning Policy Framework or subsequently issued national policy.'</p>
74	16	Mr Ray Liffen Carshalton-on-the-Hill Residents Association	MM77	<p>The removal of Green Belt (GB) status from the Gypsy and Traveller sites and the proposed extension does not, we feel, amount to 'Special Circumstances' simply because other areas in the borough are unsuitable. That factor is outweighed by the dangers implied in the loss of status.</p> <p>As an example, would the Council be able to contest planning applications for dwellings, whether permanent or not, of two stories? They would clearly clash with the openness of the surrounding GB but the land would not have GB protection so they could stick out like a sore thumb.</p> <p>The earlier proposal for the GB to wash over the sites plus the extension is much preferred. S104 is a vulnerable site on the very fringe of built-up London and allowing a breach in the GB is an unwelcome precedent and can only encourage unwelcome development proposals.</p> <p>This same point about precedent applies to S98, the Rosehill MOL area. The arguments for removal of MOL status do not seem strong. This would be an unnecessary change.</p>

24	8	The Mayor Of London	MM78 & MM79	<p>The Mayor objects to the proposed removal of Rosehill Recreation and to the West of Beddington Lane from MOL which is not in conformity with the London Plan. The Mayor would consider their removal from MOL only when development has been completed.</p> <p>Should the Inspector insist that the site be taken out of MOL, the Mayor recommends that the boundary be drawn tightly around the proposed development site and that the site be re-designated as “Land Limited to Education Purposes” with a caveat that should the land not be developed for Education Purposes, it would revert to MOL designation.</p>
45	10	Mr Alec Arroll Savills for Thames Water	MM78	<p>This modification relates to supporting text to confirm that S76 is one of two areas that have been taken out of MOL and that S76 is now designated as an extension to Beddington SIL. Kennet Properties support this amendment and considers it necessary to make the Local Plan sound and consistent with Main Modifications 29, 34 and 56.</p>
55	13	Mr Charlie Mansell Sutton & Cheam Labour Party	MM78	<p><i>General Comments</i></p> <p>This is a proposal to build a major secondary school on Metropolitan Open Land which is urban Green Belt. This will be at variance with the London Plan which seeks to preserve Metropolitan Open Land. The size of the site is such that most of it would be a building as the open space for sports would surround it in the remainder of the park. The school site would also put it close to 4 other secondary schools leading to both overcrowding and potential conflict on local public transport. There are other options - even including building a secondary school on a former secondary school site at Sutton West, which the Council wants for a Primary School.</p> <p><i>Is the modification positively prepared?</i></p> <p>The modification build on land that has been open since it was created as a park and was likely to be farmland before that, thus it has never been built on.</p> <p><i>Is the modification robust (based on evidence)? Is the modification effective (deliverable)?</i></p> <p>The proposal is a bad short-term fix to provide places in the wrong area. The evidence from the GLA here: https://data.london.gov.uk/dataset/pan-london-school-place-demand (See first document and final map in it) shows that the biggest change in demand between now and 2024 is in Sutton Central and Wandle Valley wards not in Sutton North ward which is surrounded by 3 secondary schools. This is why we have argued that the old Sutton West site (identified by the Council for a primary, but should be a secondary) and perhaps later a site in Hackbridge near the housing intensification area would be the best 2 places for new secondaries</p> <p><i>Is the modification consistent with national planning policy?</i></p> <p>This will be at variance with the London Plan which seeks to preserve Metropolitan Open Land.</p>

62	14	Mr Stuart Mills Iceni for SEGRO	MM78	<p>2.9 We strongly support the proposed additional wording to paragraph P24.5 to include reference to the removal of land to the west of Beddington Lane from the MOL and its designation as Strategic Industrial Land. This will contribute towards ensuring a sufficient supply of industrial land for the Borough is identified.</p> <p>2.10 As discussed in our previous representations and accompanying site-specific MOL Assessment, the land west of Beddington Lane makes only a very limited contribution towards the purposes of MOL, and in light of the exceptional circumstances that exist to justify the release of Green Belt/ MOL in order to meet the significant development needs of the Borough, we consider it justifiable and necessary to release this land and to allocate it for industrial uses. The development of this land will provide the opportunity to create a well-defined, long term defensible eastern boundary for the MOL which will take full account of the Energy Recovery Facility being constructed to the west and the associated significant landscape enhancements at Beddington Farmlands. As such, we consider the amendment proposed at MM78 is necessary to make the Plan sound.</p>
75	16	Mr Ray Liffen Carshalton-on-the-Hill Residents Association	MM78	<p>The removal of Green Belt (GB) status from the Gypsy and Traveller sites and the proposed extension does not, we feel, amount to 'Special Circumstances' simply because other areas in the borough are unsuitable. That factor is outweighed by the dangers implied in the loss of status.</p> <p>As an example, would the Council be able to contest planning applications for dwellings, whether permanent or not, of two stories? They would clearly clash with the openness of the surrounding GB but the land would not have GB protection so they could stick out like a sore thumb.</p> <p>The earlier proposal for the GB to wash over the sites plus the extension is much preferred. S104 is a vulnerable site on the very fringe of built-up London and allowing a breach in the GB is an unwelcome precedent and can only encourage unwelcome development proposals.</p> <p>This same point about precedent applies to S98, the Rosehill MOL area. The arguments for removal of MOL status do not seem strong. This would be an unnecessary change.</p>
46	10	Mr Alec Arroll Savills for Thames Water	MM79	<p>For the reasons set out above, Kennet Properties considers it necessary to remove site s76 from MOL and to allocate it for industrial development in order to meet Sutton's objectively assessed need for industrial development. Kennet Properties therefore support this modification to the wording of policy 24 confirming S76 is to be removed from MOL and is to be designated as an extension to Beddington SIL. Kennet Properties considers this necessary to make the Local Plan sound and consistent with Main Modifications 29, 34, 56 and 8.</p>
56	13	Mr Charlie Mansell Sutton & Cheam Labour Party	MM79	<p><i>General Comments</i></p> <p>This is a proposal to build a major secondary school on Metropolitan Open Land which is urban Green Belt. This will be at variance with the London Plan which seeks to preserve Metropolitan Open Land. The size of the site is such that most of it would be a building as the open space for sports would surround it in the remainder of the park. The school site would also put it close to 4 other secondary schools leading to both overcrowding and potential conflict on local public transport. There are other options - even including building a secondary school on a former secondary school site at Sutton West, which the Council wants for a Primary School.</p> <p><i>Is the modification positively prepared?</i></p> <p>The modification build on land that has been open since it was created as a park and was likely to be farmland before that, thus it has never been built on.</p> <p><i>Is the modification robust (based on evidence)? Is the modification effective (deliverable)?</i></p> <p>The proposal is a bad short-term fix to provide places in the wrong area. The evidence from the GLA here: https://data.london.gov.uk/dataset/pan-london-school-place-demand (See first document and final map in it) shows that the biggest change in demand between now and 2024 is in Sutton Central and Wandle Valley wards not in Sutton North ward which is surrounded by 3 secondary schools. This is why we have argued that the old Sutton West site (identified by the Council for a primary, but should be a secondary) and perhaps later a site in Hackbridge near the housing intensification area would be the best 2 places for new secondaries</p> <p><i>Is the modification consistent with national planning policy?</i></p> <p>This will be at variance with the London Plan which seeks to preserve Metropolitan Open Land.</p>

63	14	Mr Stuart Mills Iceni for SEGRO	MM79	2.11 In accordance with our comments above relating to MM78, we strongly support the proposed amendment to Policy 24(a) to include reference to removing S76 from the MOL designation in order to facilitate the extension of Beddington Lane SIL. As noted previously, we consider this is entirely justifiable having regard to the very limited contribution the land makes towards the purposes of MOL and the necessity of allocating sufficient land to meet the Borough's needs for industrial land.
76	16	Mr Ray Liffen Carshalton-on-the-Hill Residents Association	MM79	<p>The removal of Green Belt (GB) status from the Gypsy and Traveller sites and the proposed extension does not, we feel, amount to 'Special Circumstances' simply because other areas in the borough are unsuitable. That factor is outweighed by the dangers implied in the loss of status.</p> <p>As an example, would the Council be able to contest planning applications for dwellings, whether permanent or not, of two stories? They would clearly clash with the openness of the surrounding GB but the land would not have GB protection so they could stick out like a sore thumb.</p> <p>The earlier proposal for the GB to wash over the sites plus the extension is much preferred. S104 is a vulnerable site on the very fringe of built-up London and allowing a breach in the GB is an unwelcome precedent and can only encourage unwelcome development proposals.</p> <p>This same point about precedent applies to S98, the Rosehill MOL area. The arguments for removal of MOL status do not seem strong. This would be an unnecessary change.</p>
77	16	Mr Ray Liffen Carshalton-on-the-Hill Residents Association	MM79	The inclusion of this draft proposal continues to be unwelcome. There is a 'soft boundary' between Lawson Walk and Queen Mary's Park. The lack of fencing provides a good ambience but it would offer a temptation to developers since the boundary would become a 'grey area'. Many other GB areas include small housing estates. By maintaining the present GB boundary the SLP would provide stronger protection against unwelcome development.
99	20	Ms Vicky Aston Sport England	MM79	<p>Sport England objected (24/02/2017) in our representations to the Council to the loss of any sports facilities from this site. The allocation of existing sports facilities for an education use (MM79 and 134) paragraph does not meet paragraph 74 of the National Planning Policy Framework and the Council does not have a sufficiently robust up-to-date sports strategy to justify the loss of these facilities. Sport England is disappointed that in the proposed modifications the Council does not appear to acknowledge the loss of existing sports facilities and impact on existing sports facilities from this development. This includes the potential loss of the artificial pitch (disused) and 5 floodlit tennis courts. The Lawn Tennis Association (LTA) has advised us that this is a site of significant importance for current participation in tennis, competition and performance. The loss of the outdoor courts will see the loss of some of the only floodlit courts in the Borough which will severely restrict the LTA's ability to work with partners to grow participation in tennis locally in line with the new Transforming British Tennis Together programme. The LTA confirms that they support our objection to this site allocation and if the development does go ahead wish to ensure that it does not have a detrimental impact on the centre (particularly access and car parking).</p> <p>In light of the above, the sports facilities that could potentially be lost from the site should be replaced or retained (in accordance with paragraph 74 of the NPPF) and Sport England suggests that the following wording or similar is included within the policy;</p> <p>'The artificial pitch and tennis courts (including those that are floodlit) that will be lost as a result of this development will be replaced within the Rosehill Recreation Ground or in an alternative location within the catchment area of the site. A management plan for the dual use of this site including a parking strategy should be prepared for the site to ensure that the needs of the sports centre and users of the adjacent playing fields can continue to be met.'</p>

				<p>Sport England will contact the Council to discuss this matter further. It would be preferable for the Council to identify the location of the replacement floodlit tennis courts as part of the policy. If it is intended that the School will make use of the existing sports facilities on the site then it should be made clear in the policy that the Council will continue to allow community access to these facilities through a community use agreement. It is of significant concern that existing well used community facilities could potentially be lost to education use.</p> <p>Sport England objected (24/02/2017) in our representations to the Council to the loss of any sports facilities from this site. The allocation of existing sports facilities for an education use (MM79 and 134) paragraph does not meet paragraph 74 of the National Planning Policy Framework and the Council does not have a sufficiently robust up-to-date sports strategy to justify the loss of these facilities. Sport England is disappointed that in the proposed modifications the Council does not appear to acknowledge the loss of existing sports facilities and impact on existing sports facilities from this development. This includes the potential loss of the artificial pitch (disused) and 5 floodlit tennis courts. The Lawn Tennis Association (LTA) has advised us that this is a site of significant importance for current participation in tennis, competition and performance. The loss of the outdoor courts will see the loss of some of the only floodlit courts in the Borough which will severely restrict the LTA's ability to work with partners to grow participation in tennis locally in line with the new Transforming British Tennis Together programme. The LTA confirms that they support our objection to this site allocation and if the development does go ahead wish to ensure that it does not have a detrimental impact on the centre (particularly access and car parking).</p> <p>In light of the above, the sports facilities that could potentially be lost from the site should be replaced or retained (in accordance with paragraph 74 of the NPPF) and Sport England suggests that the following wording or similar is included within the policy;</p> <p>'The artificial pitch and tennis courts (including those that are floodlit) that will be lost as a result of this development will be replaced within the Rosehill Recreation Ground or in an alternative location within the catchment area of the site. A management plan for the dual use of this site including a parking strategy should be prepared for the site to ensure that the needs of the sports centre and users of the adjacent playing fields can continue to be met.'</p> <p>Sport England will contact the Council to discuss this matter further. It would be preferable for the Council to identify the location of the replacement floodlit tennis courts as part of the policy. If it is intended that the School will make use of the existing sports facilities on the site then it should be made clear in the policy that the Council will continue to allow community access to these facilities through a community use agreement. It is of significant concern that existing well used community facilities could potentially be lost to education use.</p>
25	8	The Mayor Of London	MM80	The proposed change to "f" should refer to "land" and not "sites", to enable tighter protection of Green Belt and Metropolitan Open Land.
64	14	Mr Stuart Mills Iceni for SEGRO	MM80	2.12 We broadly welcome the proposed amendments detailed by MM80 to the wording of parts (d), (e) and (f) of Policy 24, which we consider largely address the main objections we raised regarding the soundness of this part of the policy in our previous representations.
50	11	Ms Katharine Fletcher Historic England	MM96	We request a slight adjustment to our earlier recommended text for Policy 30, part k). The reason is that scheduled monuments are accorded greater protection commensurate with their significance. The amendment should have been phrased as follows: Policy 30, k)(i): 'In consultation with the Greater London Archaeological Advisory Service, require the necessary level of investigation and recording for development proposals that affect, or have the potential to affect Sutton's archaeological heritage. <i>Remains that are scheduled should be protected in situ. Non-designated</i> remains of archaeological importance should also be protected in situ or, if this is not possible, excavated and removed as directed by the Greater London Archaeological Advisory Service.'
26	8	The Mayor Of London	MM98	The change to (ii) is supported as this will provide more flexibility for using different types of energy.
33	9	Mr Richard Hill Thames Water	MM107	Support.
34	9	Mr Richard Hill Thames Water	MM109	Support
27	8	The Mayor Of London	MM110	The proposed modifications are supported as they make the Air Quality policy clearer and easier to understand.

28	8	The Mayor Of London	MM113	<p>Enhancements to bus services are likely to be required with or without the tram extension, and this should be made clear in Policy 35 as requested in TfL's previous comments (dated 10th February 2017). Contributions should be secured via s106 to mitigate the impact of development on the network.</p> <p>In TfL's previous comments it was also suggested that reference should be made to facilities for taxis with respect to TfL's Ranks Action Plan (2015) and the Mayor's Taxi and Private Hire Strategy (2016).</p>
70	15	Ms Sarah Hoad Transport for London	MM113	Any proposed road schemes (MM113) that affect the Transport for London Road Network (TLRN), for example the A232, will be subject to detailed design and modelling, and should be assessed for compliance with the Mayor's Healthy Streets Approach.
29	8	The Mayor Of London	MM115	Initiatives to minimise the impact of freight and servicing are welcomed in accordance with the London Plan.
72	15	Ms Sarah Hoad Transport for London	MM115	Initiatives to minimise the impact of freight and servicing are welcomed in accordance with the London Plan, and therefore the proposed amendment to Policy 36 (MM115) is supported by TfL.
30	8	The Mayor Of London	MM116	In TfL's previous comments (dated 10th February 2017) detailed changes to the parking standards included in Appendix 11 were recommended. The Council should provide confirmation that these amendments have been addressed.
35	9	Mr Richard Hill Thames Water	MM120	Support.
51	11	Ms Katharine Fletcher Historic England	Civic Centre Sites [MM123]	We welcome the various references in the modifications to consideration of the setting of Trinity Church spire as a key landmark in relation to proposals for the Civic Centre.
36	9	Mr Richard Hill Thames Water	MM124	Support
79	17	Ms Katherine Harrison Surrey County Council	MM132	Thank you for notifying Surrey County Council of the Main Modifications to the Sutton Local Plan. As the mineral and waste planning authority for Surrey we support the wording of MM29 and MM132
6	6	Mr Neil Rowley Savills for Newcore Capital Management	STC35 [partly related to MM127]	<p>We write to make representations on behalf of Newcore Capital Management which is in ongoing discussions with LB Sutton in respect of the above.</p> <p>The Planning History should be updated to reflect the most recent application that has been granted on the site:</p> <p>B2016/75637 – Conversion of the Bridge Road wing of Copthall House from Class B1 (offices) to Class C3 residential and erection of an additional three storeys (creating a part six storey building to provide 32 flats (eleven studio flats, fifteen 1-bedroomed and six 2-bedroomed). Erection of a five storey accommodation stairwell to the front ; alterations to the facades; new pedestrian entrances from Bridge Road; cycle and bin storage, disabled car parking bays and services at ground floor level was GRANTED on 27/02/17.</p> <p>The indicative capacity should be increased to reflect recent pre-application discussions which suggested that 195 units on the site would be broadly acceptable. <i>[Council Note: This permission retains the Post Office and Telephone Exchange]</i></p>
37	9	Mr Richard Hill Thames Water	MM128	Support
100	20	Ms Vicky Aston Sport England	MM134	As set out in our representations above to MM79 Sport England objects to the allocation of this site to education use and recommends that additional text is added to the policy to secure replacement of these facilities in line with paragraph 74 of the NPPF.
38	9	Mr Richard Hill Thames Water	MM129	Support

7	7	Mr Neil Rowley Savills for Marshbridge Ltd	S2 [relates to MM130]	<p>We write to make representations on behalf of Marshbridge Ltd who are in ongoing discussions with LB Sutton in respect of the above and are preparing a planning application.</p> <p>In summary the Inspector has proposed reducing the indicative capacity. If this modification is accepted then an indication of capacity that was properly and accurately estimated (and then corroborated through a formal pre-application process) would be replaced by an arbitrary figure based on a matrix that is in the process of being superceded. In this case the Plan would not be robust, justified or supported by appropriate evidence and accordingly would be unsound.</p> <p>Background The site is 1.26 hectares in size and occupies a roughly triangular shaped plot of land to the north of Hackbridge Station. It is a brownfield site that is currently occupied by small industrial units and open storage, predominantly covered by concrete and tarmac and inaccessible to the public. It has a current PTAL rating of 3. The site was originally a railway yard with part used as a cardboard factory. Marshbridge Ltd has undertaken extensive pre-application discussions on its redevelopment proposals for the site. This has included discussions with LB Sutton, the GLA and local community.</p> <p>Site Allocation We support the allocation as drafted in the submission version of the Local Plan and the indicative capacity of 204 units suggested by the allocation.</p> <p>Comment We object to Proposed Main Modification 130 recommended by the Inspector. This modification recommends reducing the indicative capacity from 204 to 174 dwellings. In our view this is not justified or effective and will make the plan unsound.</p> <p>The reason given by the Inspector for the reduction is that to be consistent with the supporting text in the Sutton Local Plan the indicative capacity should be based on the London Plan density matrix and not a higher figure. We disagree with this for the reasons set out below.</p> <p>Table 3.2 of the adopted London Plan is provided below. <i>[Not reproduced]</i></p> <p>The Council's response to Inspector's Questions (ED40) states that the current indicative capacity for site S2 was derived from the upper band of the Mayor's Density Matrix for the Urban setting and relevant PTAL level (170 units per hectare). This is above the capacity of 174 net additional dwellings that is indicated by the middle band of the Mayoral Density Matrix.</p> <p>Paragraph 3.30 of the London Plan states: <i>'Where transport assessments other than PTALs can reasonably demonstrate that a site has either good existing or planned public transport connectivity and capacity, and subject to the wider concerns of this policy, the density of a scheme may be at the higher end of the appropriate density range. Where connectivity and capacity are limited, density should be at the lower end of the appropriate range. The Housing SPG provides further guidance on implementation of this policy in different circumstances including mixed use development, taking into account plot ratio and vertical and horizontal mixes of use.'</i></p> <p>The Mayor's Housing SPG 2016 (as amended) states: <i>'Policy 3.4 and Table 3.2 are critical in assessing individual residential proposals but their inherent flexibility means that Table 3.2 in particular should be used as a starting point and guide rather than as an absolute rule so as to also take proper account of other objectives, especially for dwelling mix, environmental and social infrastructure, the need for other land uses (eg employment or commercial floorspace), local character and context, together with other local circumstances, such as improvements to public transport capacity and accessibility. The London Plan is clear that the SRQ density matrix should not be applied mechanistically, without being qualified by consideration of other factors and planning policy requirements.'</i></p> <p>The site is in a highly sustainable location with excellent public transport links. It is within easy walking distance of Hackbridge railway station and local bus routes.</p>
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31	8	The Mayor of London	MM132	The Mayor objects to the allocation of S76 for Industry and the removal of its designation as Metropolitan Open Land.
47	10	Mr Alec Arrol Savills for Thames Water	MM132	For the reasons set out above, Kennet Properties considers it necessary to remove site s76 from MOL and to allocate it for industrial development in order to meet Sutton's objectively assessed need for industrial development. Kennet Properties therefore support this modification to the wording of policy 24 confirming S76 is to be removed from MOL and is to be designated as an extension to Beddington SIL. Kennet Properties considers this necessary to make the Local Plan sound and consistent with Main Modifications 29, 34, 56 and 78.

102	21	Mr Tom Sweeney Beddington North Neighbourhood Forum	MM132 [Council allocated MM]	<p>Whilst the council is putting forward only one Metropolitan Open Land site for industrial land allocation at Beddington, it is very disappointing to see that the Thames Water site is going forward. Thames Water have failed to prevent the nuisance smells emanating from their sewage plant and have failed to engage with the Conservation Access and Management Committee for the restoration of the Beddington Farmlands. As a major landowner they are failing in their stewardship of the Beddington Farmlands and this failure should not be rewarded with a new industrial site allocation. The Planning Inspector seems to be concerned with a narrow definition of local needs. The Mayor of London's Improving Londoners' Access to Nature London Plan (Consolidated with Alterations since 2004) Implementation Report (2008) shows that we are sitting in a London sub region with significant deficits in access to nature. Where is the safeguarding of vital Metropolitan Open Land needed to create this access for people (particularly from the more deprived areas of Croydon to the north east)?</p> <p>Open space seems to be regarded as a reservoir of spare land to be allocated to other uses when the whim of the developer / landowner / planning inspector deems it necessary. We will have the slow piecemeal chipping away of the entirety of the Metropolitan Open Land at this rate. There will always be another report identifying an unmet need which it will be decided is far more important than natural species diversity, people's health and the need to enjoy areas of tranquillity in an increasing crowded city. When will planning inspector wake up to the fact that this land was allocated to be protected as open land and not occupied by low density sprawl uses that prevail in the Beddington SIL? The land is already home to a diverse ecological community and can easily be enhanced further. The current neglect of the landowner is not a bar to the future potential of this land. The Council can meet industrial land requirements within the Beddington SIL without the loss of MOL which the Mayor of London has a presumption against. As part of this there is a need to look at the over-allocation of sites within the South London Waste Plan. Surely there is an opportunity with the new incinerator which largely meets the required tonnage set out in the South London Waste Plan to free up sites for industrial use instead of safeguarding an unreasonable number of sites? When the waste plan was put together this facility was not in place and the waste plan earmarked any possible bit of land which may have been involved in the commercial tender process with the councils. Now the incinerator is in place and a solution found there is a need to look properly at these allocations. What better opportunity is there than when the London Plan is being updated and we can look at all these issues from the strategic London level?</p> <p>There are also many areas of the Strategic Industrial Location that are under used. More proactive planning and the threat of compulsory purchase can get these sites into more intensive use. Loss of open space will harm the Wandle Valley Regional Park (which was a cross-borough project). In particular the loss of this site will prevent access to the regional park from the north east (where communities are deprived of access). Perhaps a compromise would be to allocate green corridors from Beddington Lane into the regional park across parts of the proposed industrial site, although this would not be the preferred option)</p>
65	14	Mr Stuart Mills Iceni for SEGRO	MM132	<p>2.13 We strongly support the proposed allocation of this site for employment (B1(b)(c), B2 or B8) uses. As detailed previously, there is a very significant need for additional employment floorspace in the Borough over the plan period, and the Inspector has highlighted a shortfall in the supply identified by the Council in the Proposed Submission (Regulation 19) version of the Local Plan. Consequently, there is a significant need to identify additional land for such uses, and for industrial uses in particular.</p> <p>2.14 The development of the land west of Beddington Lane has the potential to enable Beddington Lane SIL to meet the logistics needs of the south London sub-region by providing a significant amount of new floorspace and kick-starting the regeneration and improvement of the existing floorspace within the wider Beddington Lane area.</p> <p>2.15 We are not aware of any technical constraints to the delivery of a sustainable employment generating development on this site, and as detailed within the previous representations and accompanying MOL Review, the site makes only a very limited contribution towards the purposes of MOL and may therefore be released in order to assist in meeting the very acute need identified for Sutton over the plan period.</p> <p>2.16 We therefore support the proposed allocation of this site, which we consider to be vital to ensure the Plan is sound. The omission of this site as an allocation would fail to deliver sufficient employment floorspace to meet the Borough's objectively assessed employment needs, and would therefore not be positively prepared, justified or effective. The proposed modification would therefore address our previous objection in this regard.</p> <p>2.17 In terms of the detailed wording of the proposed allocation, we cannot see the relevance of the reference to development proposals needing to pay particular regard to "The South London Waste Plan DPD and monitoring reports relating to it", given the proposed use of the site for employment generating purposes as opposed to waste management. We therefore encourage the Council to delete this reference.</p>

103	9	Mr Richard Hill Thames Water	MM132	In relation to Main Modifications MM29, 34, 54, 78, 79 and 132, Thames Water support the proposed modifications which will remove land west of Beddington Lane from the MOL and provide an allocation for employment land.
56	13	Mr Charlie Mansell Sutton & Cheam Labour Party	MM134	<i>General Comments</i> This is a proposal to build a major secondary school on Metropolitan Open Land which is urban Green Belt. This will be at variance with the London Plan which seeks to preserve Metropolitan Open Land. The size of the site is such that most of it would be a building as the open space for sports would surround it in the remainder of the park. The school site would also put it close to 4 other secondary schools leading to both overcrowding and potential conflict on local public transport. There are other options - even including building a secondary school on a former secondary school site at Sutton West, which the Council wants for a Primary School
32	8	The Mayor of London	MM135	TfL are committed to support transport improvements in Sutton Town Centre and discussions with the Council are ongoing.
52	11	Ms Katherine Fletcher Historic England	MM135	Link Road between Brighton Road/Grove Road – while modifications MM24 and MM113 do not address our concerns we note that the inspector has our representations regarding the impact of the link road, and that these need not be repeated here. If this proposal remains in the plan, we respectfully request that MM135 (and policy S102) includes an explicit reference to review the need for the new link road in the context of the other transport and junction capacity assessments in policy S102.
42	10	Mr Alec Arrol Savills for Thames Water	Additional M44	This modification is a factual correction resulting from the designation of S76 as an extension to Beddington SIL. Beddington SIL therefore is now expanded by an additional 4ha. Kennet Properties supports this modification.
93	18	Mr Mark Berry Epsom & Ewell Borough Council	Additional M47	Firstly, we welcome modification AM47 Paragraph 17.5 which proposes the inclusion of references to the relationship with retail centres outside of the plan area. However, we were disappointed to note that there were no proposed modifications to recognise cross boundary assets and benefits relating to the Vision and Objectives (Page 12) and Policy 13, Policy 21 (Page 80) and Policy 25.
44	10	Mr Alec Arrol Savills for Thames Water	Additional M54	This modification is a factual correction resulting from the release of 2 sites from MOL. Kennet Properties therefore supports this amendment as it ensures that the relevant supporting text is consistent with the proposed allocation of Rosehill Recreation Ground for a school and land West of Beddington Lane for industrial use.
92	18	Mr Mark Berry Epsom & Ewell Borough Council	Additional M98	Tramlink and Major Transport Proposal: MM27-Policy 4 1st paragraph, MM28-Policy 4A & AM98-STC25:6th bullet We note the proposed modifications to the above, including the introduction of a policy hook for the future safeguarding of land for the Tramlink if necessary. However, we remain of the view that there is significant uncertainty over the delivery of proposed Tramlink within the plan period. In our view this has not been sufficiently addressed through the proposed modifications. We are concerned as to the implications of the growth predicated on its delivery and the suitability of a 'Plan B'. For the benefit of industry, residents as well as neighbouring and surrounding authorities. We call for the Local Plan to provide a greater level of certainty to how this infrastructure requirement could be achieved.
97	19	Cllr Richard Broadbent	Additional M133	App 1 p.23: 58 refers to new floodlighting when I think this is not in the capital programme now. App 1 p.8: 22 refers to STC30 for potential new school, when that is not one of the possible uses currently. STC4 is the other potential school site identified.

101	20	Ms Vicky Aston Sport England	Additional M133	Sport England is concerned that a number of projects to improve sports facilities in the Borough (scheme reference 57-60) appear to have been removed from the plan. A significant amount of new housing is proposed over the plan period and this will place additional pressure on existing facilities. According to paragraph 73 of the NPPF, planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision. The Council's evidence base should include a playing pitch strategy and built facilities strategy that adequately assesses the need in the local area and determines what sport and recreation provision is required. Sport England hopes that the Planning Inspector will advise the Council to undertake this work at the earliest opportunity so that this can inform the Council's Infrastructure Delivery Plan and help secure new and improved sports provision to meet both existing needs and the needs arising from the new housing development included within this plan. Sport England is concerned that a number of projects to improve sports facilities in the Borough (scheme reference 57-60) appear to have been removed from the plan. A significant amount of new housing is proposed over the plan period and this will place additional pressure on existing facilities. According to paragraph 73 of the NPPF, planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision. The Council's evidence base should include a playing pitch strategy and built facilities strategy that adequately assesses the need in the local area and determines what sport and recreation provision is required. Sport England hopes that the Planning Inspector will advise the Council to undertake this work at the earliest opportunity so that this can inform the Council's Infrastructure Delivery Plan and help secure new and improved sports provision to meet both existing needs and the needs arising from the new housing development included within this plan.
95	19	Cllr Richard Broadbent	Additional M164	p.21: Map 5.17 seems inconsistent with p.56 of Document 5.
96	19	Cllr Richard Broadbent	Additional M171	20 reference should be BI 11 I think.
71	15	Ms Sarah Hoad Transport for London	Car Parking	In TfL's previous comments (dated 10th February 2017) detailed changes to the car parking standards included in Appendix 11 were recommended for full compliance with the London Plan. The Council should provide confirmation that these amendments have been addressed. It should be noted that the draft new London Plan has since been published for consultation, and in some cases (car) parking standards may have changed. Local compliance with these new standards would obviously 'future proof' the Plan.