

**TOWN AND COUNTRY PLANNING ACT 1990
ACQUISITION OF LAND ACT 1981**

INQUIRY INTO:

**LONDON BOROUGH OF SUTTON
(ELM GROVE) COMPULSORY PURCHASE ORDER 2024**

APP/PCU/CPOP/P5870/3344739

PLANNING

APPENDICES

OF

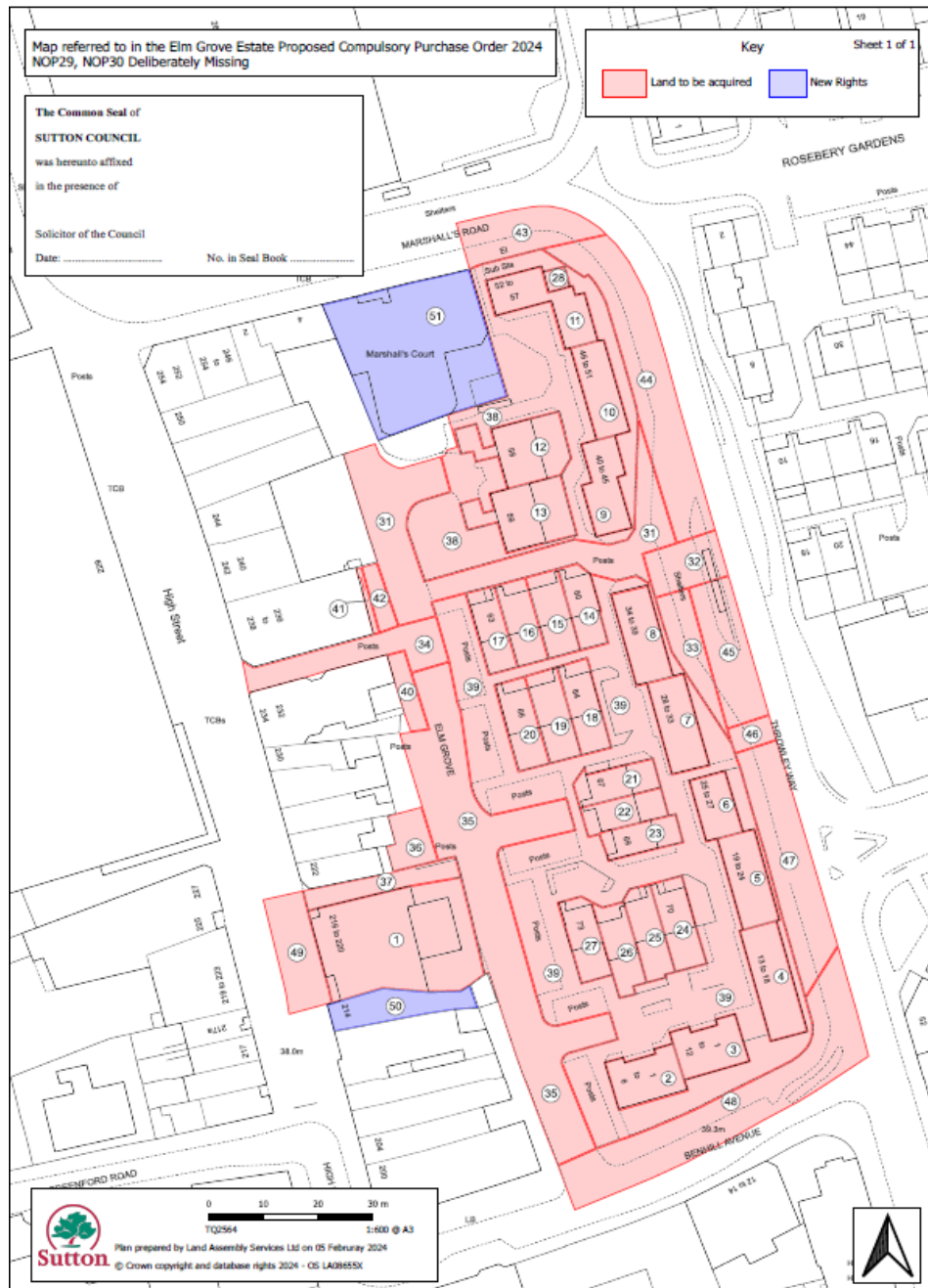
JANE BARNETT

ON BEHALF OF THE ACQUIRING AUTHORITY

25 MARCH 2025

Appendix 1

Order Location Plan and CPO Scheme Location Plan



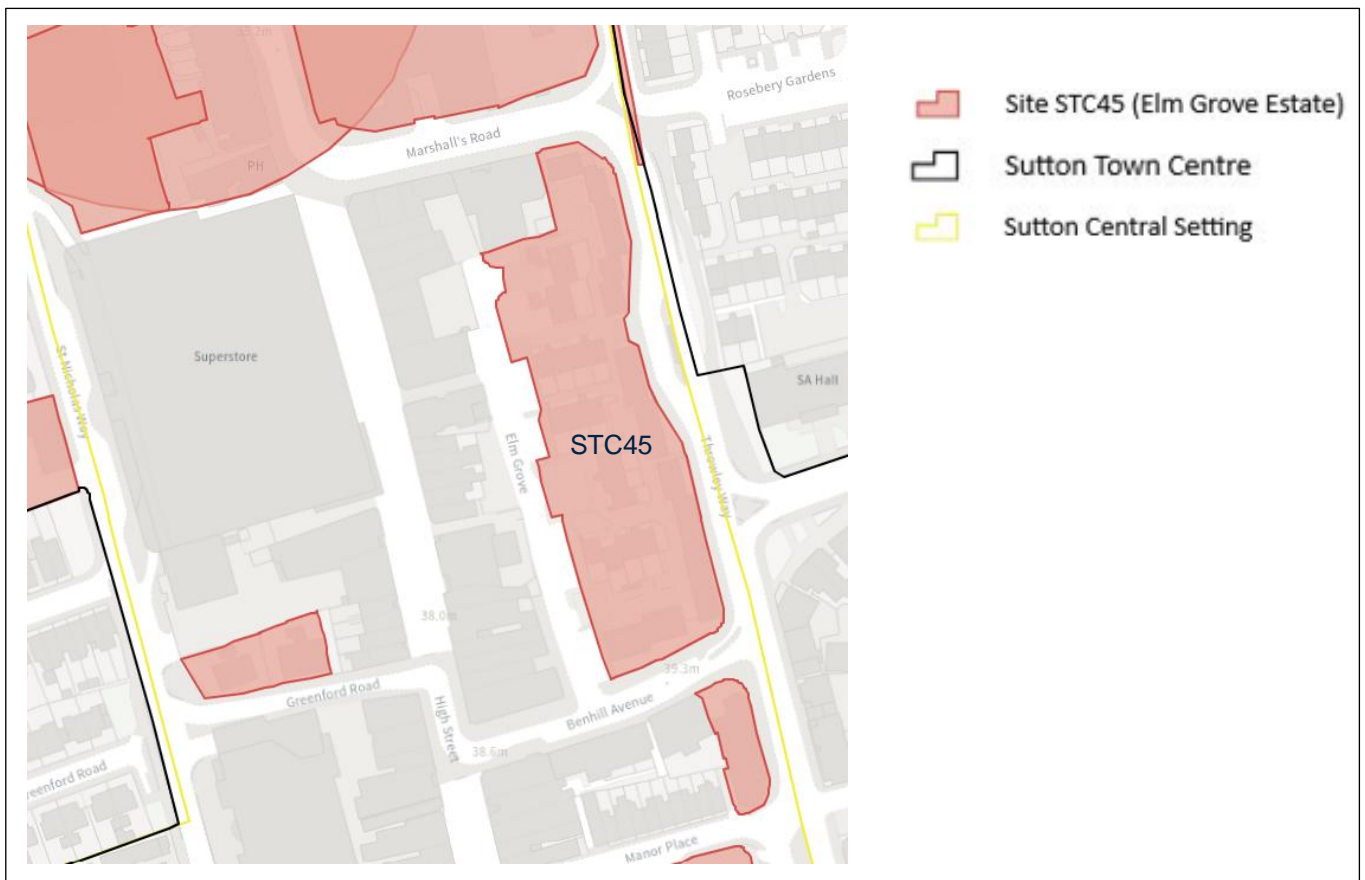
Order Location Plan



CPO Scheme Location Plan

Appendix 2

LB of Sutton's adopted 2018 Local Plan Policies Map Extract



STC45: ELM GROVE ESTATE

Elm Grove, Sutton

Location:	Sutton Town Centre
Ward:	Sutton Central
Site Area:	0.5 Hectares
Current Land Use:	Residential Dwellings
Ownership:	Council / Private
PTAL:	Level 6a
Fluvial Flood Risk:	Zone 1



SITE DESCRIPTION

The site is located to the east of Sutton Town Centre, to the rear of the High Street shops. The site is a social housing site with some privately owned dwellings. The site is accessed from Benhill Avenue to the south with Throwley Way to the east. To the east in the Benhill Estate. The site is located adjacent to the recently converted office of Marshalls Court.

POLICIES MAP DESIGNATIONS

Archaeological Priority Area; Area of Potential Intensification; Area of Taller Building Potential; Central Setting; Decentralised Energy Opportunity Area; Proposed Tramlink Extension; Secondary Shopping Frontage; Site Allocation; Sutton Town Centre.

RELEVANT PLANNING HISTORY

None.

Site 'STC45 Elm Grove Estate' is allocated for:

MIXED USE: RESIDENTIAL and TOWN CENTRE USES

Any development scheme should pay particular regard to:

- The Sutton Town Centre Masterplan (2016)
- Providing buildings of 2 to 6 storeys, with taller elements located on the Throwley Way frontage, stepping down to the west
- Providing an active frontage to Marshalls Road in the form of retail or other town centre uses
- Providing a mix of housing types, including family-sized units
- Retaining and enhancing connection between the High Street and Throwley Way
- Protecting land for Tramlink along the Throwley Way frontage
- Enabling connection to any planned decentralised energy network serving the town centre
- The need to provide flood risk assessment and appropriate Sustainable Urban Drainage System measures

INDICATIVE HOUSING CAPACITY

47 net additional dwellings – based on the Sutton Town Centre Masterplan (2016).

INDICATIVE NON-RESIDENTIAL CAPACITIES

Town Centre Uses: 281 sqm - based on the Sutton Town Centre Masterplan (2016).

INDICATIVE PHASING

Phase 2: April 2021 to March 2026


DELIVERY MECHANISM

The council is considering options for the delivery of estate renewal.

Appendix 3

Extracts from the Council's R18 Plan (July 2024) in relation to Elm Grove Estate and Northern Gateway (extent of draft allocations and supporting text)

ELM GROVE

STC6 (HELAA 2023 Ref: SH14)	Elm Grove Estate, Sutton, SM1 4EU		2.04	Sutton	Residential (Class C3)	• Residential	PTAL Level: 6a Ownership: Council / Private Flood Risk: No Open Space: No Heritage: No Permissions: Pending Comments: No
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Delivering Council-led affordable housing (supporting text)

9.18. The Council is progressing the redevelopment of the Elm Grove Estate, an existing allocation in the Adopted Local Plan, following the residents voting overwhelmingly in favour of full redevelopment. The Council agreed at committee in January 2023 to pursue the full redevelopment option and to progress to pre-planning.

9.19. Located to the rear of the High Street and forming a boundary with Throwley Way, Elm Grove currently accommodates 73 homes. The site has the potential to deliver over 200 new homes and would contribute towards the overall regeneration of the Northern Gateway through:

- New high quality and accessible homes, which meet modern space standards
- The refurbishment and rear extension of 216-220 High Street, to provide improved flexible mixed use floorspace on the existing ground floor, alongside additional new homes in the building
- A mix of one, two and three bedroom accommodation
- Up to 50% affordable housing provision
- Energy-efficient development, using a fabric first approach and incorporating renewable measures to contribute to a reduction in carbon emissions
- Private external amenity space, communal external amenity space and on-site child's play space
- New landscaping and improved public realm, including new east-west pedestrian links

9.C Draft Policy Principles 9 for Sutton Town Centre

(b) The Council will enable the delivery of new homes across Sutton Town Centre and its Area of Potential Intensification and will expect a range of tenures and dwellings sizes, including family sized homes (see Chapter 4 for the full list of potential Site Allocations) The Council will support the redevelopment of the former B&Q site for a landscaped-led residential redevelopment to create a new neighbourhood in the southern Town Centre. This scheme should introduce significant amounts of new green space, residential dwellings that include affordable units and family sized dwellings and high quality design. The Council will enable the delivery of new affordable and Council housing across its sites, including the St Nicholas Centre, the Civic Sites, Elm Grove, and Beech Tree Place. The Council will also investigate the feasibility and viability of redeveloping the Potential Renewal Areas around Sutton Town Centre, as identified on the adopted Policies Map.


(h) The Council will support proposals that will soften the effects of the gyratory, including slowing down traffic, new and improved crossings, and improved public realm. In particular, the Council will encourage the creation of active frontages along St Nicholas Way and Throwley Way, the introduction of soft landscaping and measures to create a pedestrian friendly environment along the gyratory and

to reduce the barrier effect of the gyratory for pedestrians intending to visit the High Street. The redevelopment of Council sites at the St Nicholas Centre, Civic Centre, Beech Tree Place and Elm Grove will facilitate improvements to significant parts of the gyratory. Proposals that involve enhancement to the gyratory should have regard to the Sutton Town Centre Public Realm Design Guide SPD.

Figure 9.3: Sutton Town Centre Policy Themes and linkages to Projects and Sites

Policy Themes	Major Sutton Town Centre Projects	Potential Sites
New Housing Including new mainstream housing, affordable housing, Council housing and estate regeneration.	<ul style="list-style-type: none"> • Transformational Redevelopment of the St Nicholas Centre. • Redevelopment of the Civic Centre Sites. • Enhancing the Northern Gateway. • Delivering Council-led affordable housing. • Creating a new Landscape-led Residential Neighbourhood near the Station. • High quality tall buildings. 	<ul style="list-style-type: none"> • St Nicholas Centre • Civic Centre • Secombe Theatre • Gibson Road Car Park • Elm Grove • Beech Tree Place • Former B&Q Site • Other Town Centre Site Allocations and future windfall sites
Transport and Sutton Link	<ul style="list-style-type: none"> • Transforming the Gyratory • Transformational Redevelopment of the St Nicholas Centre. • Redevelopment of the Civic Centre Sites. • Delivering Council-led affordable housing. 	<ul style="list-style-type: none"> • St Nicholas Centre • Civic Centre • Elm Grove • Beech Tree Place • Other Town Centre Site Allocations and future windfall sites located along the Sutton Link route.
Tall Buildings	<ul style="list-style-type: none"> • High quality tall buildings. 	<ul style="list-style-type: none"> • St Nicholas Centre • Civic Centre • Secombe Theatre • Gibson Road Car Park • Elm Grove • Beech Tree Place • Former B&Q Site • Other Town Centre Site Allocations and windfall sites

NORTHERN GATEWAY

STC5 (HELAA 2023 Ref: SH16)	Northern Gateway, 246-254 High Street and 2 Marshalls Road, Sutton, SM1 1PA		0.31	Sutton Town Centre	Vacant - Previously Retail & Offices (Class E)	<ul style="list-style-type: none"> • Class E • Education (Class F) • Residential 	PTAL Level: 4 Ownership: Council Flood Risk: No Open Space: No Heritage: No Permissions: No Comments: No
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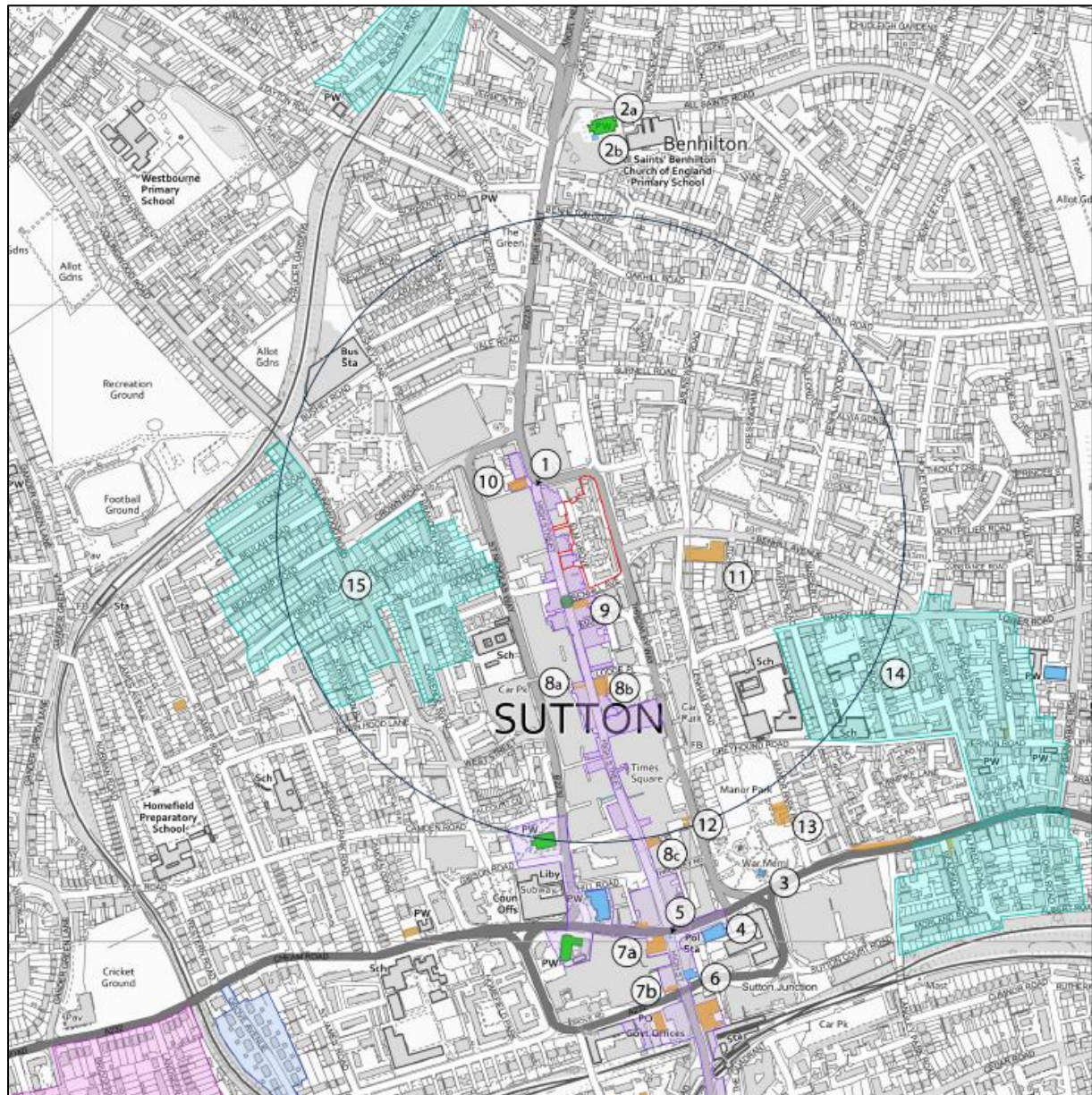
Enhancing the Northern Gateway (supporting text)

9.14. As part of the Future High Street Fund (FHSF), a Government grant to support high streets across the country, the Council acquired the ownership of the historic 246-254 High Street, known locally as the "White Building". This former fire station, located at the northern end of the High Street, has been vacant for over a decade, has become dilapidated and creates both a poor image of the town centre and negatively impacts on the northern end of the High Street.

9.15. The Council wants to bring this important building back into active use and is proposing to move Sutton College from the current Civic Centre site into the refurbished building to create a high quality educational space. The highly visible presence of the College in Northern Gateway will make a significant contribution to revitalising this part of the town centre. Any development of the site needs to pay regard to the Sutton Town Centre Conservation Area.

Appendix 4

Heritage Assets Plan



Key

-  Site
-  Grade II* listed building
-  Grade II listed building
-  Sutton Town Centre Conservation Area
-  Sutton Town Centre Conservation Area Sub Area D
-  Grove Avenue Conservation Area
-  Landseer Road Conservation Area
-  Scheduled ancient monument
-  Locally listed building
-  Area of Special Local Character

Appendix 5

Summary of Further Post OPA Submission Amendment

A response to Historic England's (HE) letter, dated 11th April 2024, was prepared on behalf of the Applicant, the London Borough of Sutton.

Following receipt of this letter, on 10th May 2024 Savills Heritage and Townscape, Savills Planning, Levitt Bernstein Architects, the Applicant and the London Borough of Sutton attended a meeting with HE to review their consultation response and discuss possible amendments to the Proposed Development which would mitigate their concerns.

At that meeting HE agreed that their principal concern was related to the visual impact of the proposed extension to 216-220 High Street and the primary marker building in View 11 of the submitted HTVIA (Savills, March 2024) as well as how these elements of the proposed development would appear in kinetic views further north from within the conservation area.

The response letter was submitted by Savills Heritage on 18th June, 2024. This set out the HTVIA case as follows and was submitted alongside revised versions of the following documents:

- Heritage, Townscape, and Visual Impact Assessment
- Parameter Plan 2: Building Heights
- Parameter Plan 6: Land Uses – Upper Floors
- DAS Addendum

The revised proposed development

At the meeting we presented a revision to the maximum parameters of the rear extension to 216-220 High Street (the 'Market House building'), which saw the massing of the Parameter Plan massing drawn back away from the High Street to match the Illustrative Masterplan building line and footprint. HE confirmed this would likely reduce the impact more immediately on the Sutton Town Centre Conservation Area (STCCA) and that the cumulative impacts of the Market House building and the 16 storey marker building together would be reduced. Accordingly the proposed maximum parameters of the rear extension to 216-220 High Street have been reduced and have been submitted to LB Sutton for consideration is a revised submission.

In response to the request from HE for a series of short-range views along the High Street looking towards 216-220 High Street, the updated HTVIA (Savills, June 2024) provides a series of four kinetic views along the northern stretch of the High Street, from the junction with Benhill Road to the pavement outside 236-238 High Street (a stretch of approx. 130m). View 11a is taken from the same location as View 11 in the earlier HTVIA (Savills, March 2024), however, to respond to HE's consultation response the camera bearing has been re-oriented to the east to take in more of Benhill Avenue and the proposed development. Views 11b, 11c, and 11d are new viewpoint locations.

Views 11a, 11b and 11d demonstrate that along this very short stretch of the High Street within STCCA the proposed development is likely to have a limited or negligible visual effect and is in-keeping with the existing and emerging townscape context of the town centre. In view 11c the proposed Market House building does appear behind 216-220 High Street (the site) as well as the adjacent parade of shops to the north. By virtue of its height relative to that of the High Street buildings seen in this short-range view, within the updated HTVIA (Savills, June 2024) the scale of the proposed development has been assessed as having the potential to change the way the townscape seen in the view is experienced. However, it is also the case that all of the visual interest contained along the High Street frontage will be retained, and this effect will arise over a short distance as the tight form of the High Street means

that the proposed development will disappear quickly out of view moving south or east. It will also be experienced kinetically and transiently by visual receptors moving away from the viewpoint location, and accordingly the effects of the proposed development will change moving away from this viewpoint. Furthermore, given the baseline context of taller buildings coming in and out of view as one passes through the conservation area and along the High Street, the HTVIA (Savills, June 2024) has assessed that the proposed development would not unduly harm the ability to appreciate and understand the historic high street, which is key to the significance of the conservation area.

Historic England's consultation response

We are grateful to Historic England for their time attending the post-submission meeting and for engaging with the revised proposals. At the meeting we also discussed a number of points raised in their consultation response which we feel warrant further consideration. For completeness, those points are set out below.

Tall buildings and Heritage At Risk

HE's letter sets out that post-war and tall building development has been identified as a risk to the conservation area within the Sutton Town Centre Historic Area Assessment (2018). However, nowhere in that document or the Sutton Town Centre Historic Area Assessment: Gateway Document (2018) is this stated explicitly. The only use of the phrase 'At Risk' in the principal document is made in relation to the vacant condition of the gateway buildings of 1-5 High Street (pg. 104), and in the gateway document it is only the 'integrity of traditional retail frontages' that are described as being 'At Risk' from imminent degradation (pg. 35-36).

HE's letter implies that post-war and modern tall building development is one of the reasons the conservation area is included on their Heritage At Risk Register. However, none of the recent appraisals of the conservation area are explicit on this point. We raise this to ensure that it is clear to the LPA that the 'Heritage At Risk' status of the conservation area has not been linked to post-war or modern tall building development within the setting of the conservation area in any of the documentation relied upon in HE's letter.

Tall buildings began to be built across the town centre in the post-war period, and the creation of the one-way gyratory system in the late 1970s to early 1980s resulted in further tall buildings being built. As a result, moving in either direction along the High Street or through the conservation area, existing tall buildings across the town centre come in and out of view, both at more visually open road junctions and when travelling along the more tightly defined and enclosed, pedestrianised High Street (see Figures 4.17, 4.18, 4.23, 4.28, 4.29 and 4.30 of the submitted HTVIA (Savills, June 2024)). It is important for the LPA to consider that both at the time the conservation area was first designated, and then subsequently extended, tall buildings have been a part of the setting and baseline context in which the historic High Street is experienced. Were it the case that the kinetic experience of tall buildings from along the High Street was so harmful as to prejudice the experience and understanding of the significance of the historic High Street, the conservation area would not have been designated in 2011, or significantly extended in 2019.

Furthermore, we suggest that tall building development within the town centre has not been uniformly harmful. This is because the existing and emerging 21st century tall building developments within the setting of the conservation area have been located at key 'gateways' into the historic town centre, denoting and reinforcing key points of access to the historic High Street, and continuing a pattern of development identified as being characteristic of the conservation area within the STCCAAMP. In this way their scale has served to improve legibility and wayfinding and repair some of the fragmentation caused by the developments undertaken in the 20th century. The Old Gasworks development at the northern end of the High Street is an example of this careful use of taller buildings to reinforce a gateway to the conservation area. It is our position that the tall buildings of the proposed development will fulfil a similar function by acting as gateway markers at the once important access route to the conservation area from Benhill Avenue, and indicating the presence of the new generous public route through to the historic town centre.

Notwithstanding this, it is our position that, were a detailed scheme for the site to be brought forward in accordance with the Design Code, the Proposed Development has the potential to enhance the setting

of the conservation area and to support its long-term conservation through enhancing the economic and social vitality of the heritage asset. These potential heritage benefits should be included in any consideration of the Proposed Development and the Heritage at Risk status of the conservation area.

HE's assessment of the proposals – direct impacts on STCCA

It is HE's position that the Proposed Development does not reflect the strategy for the positive management and regeneration of the conservation area advocated in the STCCAAMP. Taking the relevant guidelines of the STCCAAMP into account, we consider that the Proposed Development has responded positively to the objectives of the STCCAAMP for the reasons set out below.

Through the demolition of the rear extension to 216-220 High Street and the retention of the principal building, the Proposed Development would comply with the following guidelines of the STCCAAMP:

- Guideline 1: Development of the Buildings and Structures in the Conservation Area
- Guideline 3: Retention and Reinstatement of the Urban Grain
- Guideline 4: Retention of Building Lines
- Guideline 7: Retention and Reinstatement of Upper Floor Detailing

Guideline 2: Retention of the Urban Blocks encourages reinstatement of the former Elm Grove route, suggesting proposals which do so will be considered favourably alongside their effect on the High Street as a whole. The former Elm Grove is a road which connected the High Street to a residential area to the rear of the High Street and appears on the 1913 OS Map. However, faithful reinstatement of this lost access to the High Street is not possible due to infilling along the High Street and the works to create Throwley Way. Nevertheless, the Proposed Development will create a generous new east-west access route from Throwley Way and Benhill Avenue into the heart of the site, which connects to existing alleyways to the town centre. As such it is considered the Proposed Development will "significantly improve connectivity between the High Street and its hinterland" as encouraged by Guideline 2, and has gone as far as it possibly can to reinstate the former Elm Grove as suggested by, and in compliance with, Guideline 2 of the STCCAAMP. We therefore suggest the Proposed Development ought to be considered favourably in this regard.

With regard to Guideline 5: Retention and Improvement of Long Vistas, The Proposed Development will be visible in the 'long vistas' identified within Figure 17 of the STCCAAMP, in particular from the junction of the High Street and Marshall's Road, Grove Road and Cheam Road. The HTVIA (Savills, June 2024) has demonstrated that it will not impact on the ability to appreciate and understand the long linear High Street in these views, and will not introduce the kinds of visual clutter into the streetscene which Guideline 5 is concerned with. The Proposed Development therefore complies with this management guideline.

The detailed appearance of the Proposed Development is not part of the OPA, however, under a future Reserved Matters Application it is anticipated that there is the opportunity for the modern shopfront of 216- 220 High Street to be replaced with a more sensitive or traditional shopfront, which would improve the appearance of the building and enhance the conservation area, in compliance with Guideline 8: Reinstatement of Original Shopfront Features and Advertisements.

Guideline 9: Alterations and Extensions to Buildings, excluding Facades sets out that any extensions and alterations to buildings within the conservation area should be subservient to the existing High Street façade in terms of height, scale and massing. The explanatory text to the guideline also sets out that any extensions to the rear of High Street should take the opportunity to improve the rear of the High Street buildings by creating an improved streetscene and better entrances to upper floor flats and offices (STCCAAMP para. 6.18).

Under the proposed Parameter Plan massing, the extension to the rear of 216-220 High Street is proposed to be six storeys, behind the principal High Street frontage building. The submitted HTVIA (Savills, June 2024) has demonstrated that this would be visible in short and mid-range views towards the site from the south (View 11b) and north (Views 11c, 11d 15 and 16). To mitigate its potential visual effect, the Design Code sets out that the fifth floor of the Market House building should have a different

articulation and materiality to the façades below, which are complimentary to the conservation area. The DAS Addendum (June 2024) provides a CGI which illustrates one way in which the fifth floor could be designed to mitigate the effect of its visibility. Were a bronze metal-cladding proposed to the fifth floor of the Market House building in any future RMA application, it is anticipated that in Views 11b, 11c, 15 and 16 this would ensure that the proposed massing would recede into the roofscape and read as simply another part of the varied roofscape seen in these views, particularly where it becomes less well defined and fragmented in views to the site from the north.

Where the proposed massing of the Market House building is more visible (View 11c) the updated HTVIA (Savills, June 2024) has assessed that the Parameter Plan massing for Market House has the potential to cause less than substantial harm to the conservation area arising from its visual impact in this view. However, the ability to appreciate and understand the historic high street would be unaltered by the proposals and tall buildings and extensions being visible above the parapet of the buildings fronting the High Street forms the existing baseline of the conservation area.

The demolition of the incongruous rear extension to 216 to 220 High Street, and its replacement with a block which, if the Design Code is implemented, is of high quality design which accords with the materiality and appearance of the conservation area has the potential to create an improved streetscene along Elm Grove, and in views towards the site from Benhill Avenue, in accordance with Guideline 9 of the STCCAAMP. This effect is also likely to be enhanced by landscape and public realm proposals along Elm Grove under a future RMA.

HE's assessment of the proposals – impact on the setting of STCCA

Guideline 10: Development adjacent to/nearby the Conservation Area sets out that development adjacent to or nearby the conservation area will be permitted provided that the development does not harm the character or appearance of the conservation area's buildings or the High Street as a whole. The explanatory text suggests that any development adjacent to and nearby the conservation area's buildings should respect them by being set back a sufficient depth from the High Street, that their height should respect its 'human scale', and that the choice of materials should be carefully considered.

The setting of STCCA is, in-part, defined by tall and very tall buildings from its northern to southern end which come in and out of view as one travels along the High Street. Therefore, although constituting a change to the setting of the STCCA, the Proposed Development would continue this established pattern of development. From the limited points at which the scheme will be visible along the High Street, only the upper levels of the proposed marker buildings will be visible and will be experienced as part of the established contextual, kinetic experience of STCCA.

As such it is our position that the presence of well-designed mid-rise and tall buildings set away from the conservation area and within its setting would not have a harmful impact on the conservation area, as they would not diminish the ability to appreciate and understand the historic high street from within its setting, nor would they 'loom over' the High Street in a way which is harmful to the significance of the conservation area.

Furthermore, to ensure the Proposed Development can come forward in a way which is sensitive to the character and appearance of the conservation area under a future Reserved Matters Application, the Design Code includes mandatory and suggested guidance for how a detailed design for the proposed development might come forward, including on the materiality of the building. This has been informed by an analysis of the surrounding context and conservation area buildings, in compliance with Guideline 10 of the STCCAAMP.

HE's assessment does not appear to have engaged with the submitted Design Code or considered how this might mitigate the effects of the Parameter Plan development under a future RMA, nor has it considered the baseline condition of the Elm Grove Estate site and the negative contribution it makes to the setting of the conservation area. As a result it has also not engaged with the potential enhancements to the setting of the conservation area that the Proposed Development could deliver through:

- The positive impact of the considerable uplift in architectural design quality within the setting of the conservation area, which will enhance the setting of the heritage asset, as well as and the setting of The Old Grapes PH, The Winning Post PH (locally listed building) and the Sutton Adult Education Centre (locally listed building);

- *The creation of a new generous public route to the conservation area from within its setting, which will improve access to and appreciation of the heritage asset and echoes the lost pattern of alleyways and former route of Elm Grove which gave east-west access to the conservation area;*
- *The activation of Elm Grove and other public routes through the site to the historic high street, resulting in an uplift in passive surveillance and vitality in this part of the conservation area and its setting. This will contribute to the long-term use and survival of the High Street and so supports the aims of the Sutton Town Centre Heritage Action Zone; and*
- *The improvements to wayfinding and legibility across the town centre as a result of the marker buildings, and their role in acting as gateway markers at this once important access route to the conservation area, which has been undermined and truncated by the gyratory and 20th century development.*

With this analysis in mind, it is our position that, should the detailed design of the Proposed Development come forward in compliance with the Design Code, the scheme has the potential to deliver a number of heritage and planning benefits which reinforce the objectives of the STCCAMP. These benefits should be weighed against the harm to designated heritage assets in the planning balance (NPPF 208).

Discussion of relevant legislation, policy and guidance

Principal of tall buildings on the site

It is HE's position that, as the proposed development exceeds the indicative height parameter guidelines set out within site allocation 'STC45 Elm Grove Estate' and Area of Taller Building Potential (ATBP) of 7-10 storeys, the Proposed Development does not reflect the plan-led approach to the location for tall buildings advocated for in HE's HEAN4: Tall Buildings (2022) guidance.

While it is recognised that the Proposed Development exceeds those indicative height parameters, it is important to highlight that the indicative parameter heights set out within the site allocation and ATBP are based on the assessment contained within London Borough of Sutton's Tall Building Study (Gillespies, 2008) and the Sutton Town Centre Masterplan (Allies and Morrison, 2016), both of which pre-date the existing London Plan (2021) and its directives on borough-wide characterisation to identify the capacity for growth and on the optimisation of sites through a design-led approach.

Taking the site allocation and the ATBP as a starting point, the Applicant has undertaken a robust pre-application process which tested a number of design options to determine the most appropriate form of development that responds to the site's context, including the surrounding existing and emerging tall building context. In compliance with London Plan Policy D4 Delivering Good Design, the iterative design process and Proposed Development was subject to thorough design analysis and design scrutiny by LBS's Design Review Panel and planning officers, as well as the GLA. Through this iterative testing and design process it is considered that the height and massing arrived at for the proposed development represents an appropriate approach for the site in accordance with tall building guidance set out in the local plan and London Plan policy D9.

Many of the sites forming the northern and southern gateways to the town centre are in the ATBP and have indicative parameter height guidelines set out as part of their site allocations. Yet, in the majority of cases where planning permission for tall buildings has been granted on these sites, the approved development has exceeded the height guidelines of the ATBP and the indicative parameter heights set out in the site allocation (see page 27 of the submitted DAS). It is presumed that these developments were justified through Heritage, Townscape and Visual Impact Assessments and underwent rigorous iterative design development to ensure that development would make the best use of land by following a design-led approach that optimised the capacity of the sites. If so, this would indicate that the indicative design parameters of the site allocations have under-valued the capacity of sites across the

town centre, and that consideration of different design options is required to ensure optimisation of sites. With the above in mind, while we are supportive of HE's desire to see a plan-led approach to tall buildings, we suggest flexibility is required where the existing and emerging context of a site has evolved significantly since studies were undertaken to determine indicative development parameters for sites, and where applicants can demonstrate they have followed a robust, design-led approach to optimising site capacity and delivering good design.

Finally, we are aware that a new Draft Tall Building Study has been commissioned by the London Borough of Sutton, and that first draft has been prepared. While we have not had sight of this document, it has been indicated to us that it identifies new tall buildings zones across the borough with new and revised maximum height parameters for those zones. Indicatively we have been advised that the new Draft Tall Building Study will identify the site as suitable for the heights proposed under the maximum parameters of the Proposed Development.

Impact on heritage assets

With regards to the policy requirements of the NPPF, the NPPG is clear that where potential harm to designated heritage assets is identified, it needs to be categorised as either 'less than substantial harm' or 'substantial harm' in order to identify which policies in the NPPF apply, and that which category applies should be explicitly identified. The NPPG goes on to state that the extent of the harm may vary and should be clearly articulated (Paragraph: 018 Reference ID: 18a-018-20190723). HE's assessment does not come to a conclusion as to the level of harm arising from the proposals.

Should the LPA consider the harm to the conservation area to be 'less than substantial', any harm would be required to be weighed against the public benefits of the proposals (NPPF 208), which includes heritage benefits. These include sustaining or enhancing the significance of a heritage asset and the contribution of its setting; reducing or removing risks to a heritage asset; and securing the optimum viable use of a heritage asset in support of its long term conservation (Paragraph: 020 Reference ID: 18a-020-20190723). Paragraph 212 of the NPPF 2023 directs LPAs to look for opportunities for new development within conservation areas and within the setting of heritage assets, to enhance or better reveal their significance. The submitted HTVIA (Savills, June 2024) has assessed that, should the detailed design of the Proposed Development come forward in accordance with the Design Code, it has the potential to result in an enhancement to the setting of the conservation area.

Appendix 6

CPO Scheme Massing Plan (extracted from approved Design and Access Statement under Planning Permission)



Appendix 7

Summary of pre-Application Engagement and Local Consultation

LPA, GLA, TfL and DRP pre-application consultation

LPA

The scheme has been developed in light of extensive pre-application discussions held with officers at LBS LPA.

In October 2021, an initial concept meeting was held with LBS Officers, in which the site context, planning policy position and high-level redevelopment options for the Elm Grove Estate were discussed. This formed part of the pre-planning process in the lead up to and in support of the Residents' Ballot.

In August 2022, following a successful Residents' Ballot, two options were presented to LBS Officers comprising different height and massing, layout and residential unit mix approaches. Officers were supportive of the principle of redevelopment as a whole and the layout, developed around the principle of a single "diagonal" east-west connection through the Site, was agreed with taller elements requiring full design and townscape justification.

In April 2023, the Applicant entered into a PPA with LBS and regularly met with Planning, Highways & Transport and Technical Officers over a nine month period through to December 2023. This comprised four formal pre-application meetings alongside a number of bespoke technical and planning strategy meetings. Discussions have then continued with LBS Officers up until submission of the OPA.

The project team engaged directly with Officers at LBS LPA in relation to the emerging proposals, and discussions were held with Planning, Highways & Transport, Biodiversity and Energy & Sustainability Officers. Ahead of each meeting, the relevant planning, design and technical materials were submitted for officer review to allow for constructive discussions. These meetings took place on the following dates:

- I. Concept Meeting – 14th October 2021
- II. Pre Planning Meeting – 5th August 2022
- III. PPA Pre Application Meeting 1 – 28th April 2023
- IV. OPA Scope Meeting – 18th May 2023
- V. OPA Strategy Meeting – 23rd June 2023
- VI. LBS Transport (& TfL) Meeting – 7th July 2023

VII. PPA Pre Application Meeting 2 – 21st July 2023

VIII. OPA Scope Meeting – 19th September 2023

IX. PPA Pre Application Meeting 3 – 23rd October 2023

X. Design Code Meeting - 8th December 2023

XI. PPA Pre Application Meeting 4 – 12th December 2023

XII. LBS Biodiversity Meeting – 9th January 2024

The Applicant was subsequently provided with formal written feedback in response to both PPA Pre-Application Meetings 1 and 2 and a final concluding report following PPA Pre-Application Meetings 3 and 4 (as received in March 2024). These also concluded on technical matters engaged at that time either through the meetings themselves or officer consultation as part of that pre-application stage. The feedback has provided a comprehensive response to design and technical matters in relation to the proposals. As such, the process has been iterative with the development proposals having evolved since conception through verbal and written feedback and advice from Officers throughout the consultation period. Work has then continued to be undertaken by the design team to address the comments made by Officers. An explanation of how the scheme has evolved to take account of Officer feedback during the pre-application consultation process to include the Applicant's design response at each stage, is provided in the pre-application stakeholder feedback matrix provided below.

Matters agreed / supported by LBS LPA Officers during the pre-application process, and as confirmed through receipt of the final written response received in respect of Pre-applications 3 and 4 (ref: PRE2022/00126) are outlined below:

- I.** Principle of residential redevelopment of the existing Estate through higher densities to achieve a significant number of new homes required as part of the regeneration proposals and to support the delivery of replacement plus new affordable provision.
- II.** Mix of town centre plus residential uses at 216-220 High Street, through retention and extension.
- III.** Overall height hierarchy to include the distribution of massing across the Site, the maximum height of the primary marker building at 16 storeys; and, acceptance of the design, townscape and place-making justification for the location of the primary marker building at the end of Benhill Avenue.
- IV.** Block layout and orientation based on the Illustrative Masterplan and inclusive of the east-west diagonal link.
- V.** Revised height and massing of the Market House new build element which is in-keeping with the wider masterplan and supported.
- VI.** Architectural approach for the marker buildings, to include the banding together of the upper floors to ensure some commonality across the two buildings and securing of key design principles and quality through the Design Code.

- VII.** Indicative unit mix, inclusive of a suitable range of both smaller (2-bedroom 4-person units) and larger family (3-bedroom units) homes, noting the town centre location and as justified through up-to-date needs and demand analysis, including the Council's housing register, as well as market evidence. To be secured through the Development Specification Statement.
- VIII.** Balcony strategy across the Site supported and its role in facilitating natural surveillance.
- IX.** The new build element of Market House does not result in any harm to the Conservation Area.
- X.** Proposed density of development and housing mix achieves a good level of design quality, to include indicative layouts, high dual / triple aspect provision and separation distances.
- XI.** Rationalisation of car parking and improved public realm strategy.
- XII.** On-site play space strategy plus external amenity provision, to include locations and functions as well as proposed treatment of defensible space around these in public areas.
- XIII.** Entrance layout, core locations and enclosures, to include activation of Throwley Way frontage and illustrative treatment of facades at street level.
- XIV.** Level of car parking for returning residents accepted subject to a strategy for re-purposing those in the future if and when resident demand reduces.
- XV.** Residential car parking access via Elm Grove, subject to further detailed testing of illustrative scheme.
- XVI.** Removal of the existing layby and bus stop on Throwley Way supported by adequate testing of potential options for the relocation of the bus stop and where demonstrated not feasible, then investigations into increasing the use of the other existing remaining bus stops, informed by a Road Safety Audit and an Equalities Impact Assessment.
- XVII.** Commitment to minimum 10% Biodiversity Net Gain on-site to be secured through the OPA with detailed assessments to be undertaken in support of future RMAs to demonstrate how this can be maximised.
- XVIII.** Parameter Plans, to include their scope and ability, in conjunction with the Development Specification Statement and Design Code to control the outline permission and aid the preparation of futures RMAs.

GLA

A total of two formal pre-application meetings were held with the GLA between August and November 2023. The first pre-application meeting was held with the GLA on 9th August 2023. This meeting was to primarily discuss: the principles of the scheme relating to the densification of the Site and the Estate regeneration process; affordable housing re-provision and new housing provision; design; tall buildings; transport; and, treatment of Throwley Way and the proposed east-west link through the Site. The respective formal written pre-application report received on 15th September 2023 was supportive of the proposed estate regeneration scheme, to include: the net increase in affordable housing floorspace; the principle of an east-west route through the Site and the opportunities it presents for improved public realm as well as permeability; block layout, orientation and entrances of the Illustrative Masterplan; overall

residential quality and indicative materials; the landscaping and play-space strategy, to include the incorporation of incidental and informal provision; and preparation and submission of a Design Code as part of the OPA to assist in securing residential and architectural quality. Further information was requested to support the proposed height and massing strategy to include townscape justification for the marker buildings.

Subsequent to the first meeting and after additional design work, a second pre-application meeting was held with GLA Planning, Design and Energy Officers on 9th November 2023. There was a further focus on the proposed height hierarchy and townscape justification as well as the improved public realm strategy for Elm Grove and the associated rationalisation of car parking in response to Officer comments at the first meeting. There was also discussion on daylight, sunlight and overshadowing matters; and energy and sustainability were also discussed and a full breakdown of the feedback provided during these sessions and the Applicant's design response are detailed within the pre-application stakeholder feedback matrix provided below.

A second and concluding formal written pre-application report was received on 20th December 2023. This confirmed continued support for the proposed regeneration of the Estate, noting the uplift in Social Rent affordable floorspace as part of this. More detailed feedback was provided on design considerations, summarising the discussions that took place during the previous meetings and largely relating to the illustrative material coming forward in relation the OPA. Detailed comments on the proposed energy strategy were also provided by the dedicated GLA Energy and Sustainability Officer and reflective of the further technical assessments undertaken by AECOM, as the project's energy and sustainability consultant. The energy measures and key sustainability principles as agreed with the Energy and Sustainability Officers at the GLA and LBS LPA have been addressed through the submitted Energy and Sustainability Assessments which support the OPA.

The development proposals have evolved since conception following feedback from both LBS and GLA Officers. The proposed scheme has therefore developed in response to the guidance received at a local and regional / strategic level and significant work has been undertaken by the design team to address the comments made by Officers. An explanation of how the scheme has evolved to take account of the consultation process is provided in the pre-application stakeholder feedback matrix provided below.

Matters agreed and/or supported with / by GLA Officers during the pre-application process are outlined below:

- I. The principle of the residential redevelopment of the Estate with the aim to optimise potential and create new homes and high quality, affordable homes. .
- II. Re-provision of existing affordable floorspace in the form of replacement homes with private sale tenure (over and above the re-provision and affordable uplift) to cross subsidise regeneration considered compliant with London Plan Policy H8, subject to the GLA's FVA review (as submitted).
- III. That the scheme had evolved in response to design development and viability testing but remains within the parameters taken to resident vote and hence does not result in any material change to the Landlord Offer. Engagement with residents is on-going and will remain the case pre and post planning in accordance with the Mayor's guidance.
- IV. The proposed (maximum) heights, location of the marker buildings as well as indicative general block layouts and configurations on the basis of the design and townscape justification set out.

- V. Principle of non-residential floorspace at ground, first and second floors of 216-220 High Street plus residential units through a rear extension, considered in-keeping with the wider masterplan.
- VI. Indicative housing mix, as informed by returning resident needs first followed by identified local needs.
- VII. Overall quality of residential amenity to include high percentage of dual / triple aspect homes.
- VIII. Provision of communal and private amenity space, in the form of private gardens, balconies, terraces and courtyards as well as communal podium gardens and a public open square alongside landscaping and public realm, to include, in particular, the east-west diagonal link. The principle of the play strategy in achieving London Plan standards for doorstep play on-site with informal intergenerational provision incorporated for older children play plus existing facilities available off-site.
- IX. Car-free with the exception of provision required to meet needs for returning residents and where subject to re-purposing opportunities plus blue badge spaces. To include the rationalisation of existing commercial car parking along Elm Grove to provide an improved public realm strategy and a human-scale pedestrian environment.
- X. Approaches to overheating, whole life cycle and circular economy all welcomed and performance targets that exceed minimum policy requirements noted considered very positive.

GLA Officers also considered that the proposed scheme was subject to sufficient design scrutiny and feedback at the pre-application stage through proactive and supportive consultation and engagement with LBS LPA, Design South East and GLA Design Officers (in the context of London Plan Policy D4).

TfL

As part of the pre-application meetings with GLA Officers, representatives from TfL were also present on the 9th August and 20th December. TfL officers provided feedback on the proposed transport and car parking strategy. This included agreement on the scope and methodology of the Transport Assessment as prepared by the appointed transport consultant (Markides) as well as the proposed parking strategy in terms of allocation and distribution.

TfL Officers recognised and accepted that the proposals seek to balance the maximum car parking standards as set out in the London Plan with the contractual obligation to provide replacement provision for existing residents through Estate regeneration.#

A dedicated TfL pre-application meeting was also held on the 1st December 2023 in which discussions focused on the proposed removal of the Throwley Way bus stop (Stop E) and layby. It was agreed that in order for the Elm Grove regeneration proposals to come forward, the existing bus stop will need to be removed and cannot be re-provided on a 'like-for-like' basis. This is consistent with LBS LPA's wider emerging plans for improvements to the gyratory around the town centre. The principle of the removal of the existing bus stop was confirmed to be acceptable on the basis of an alternative bus stop being provided on the opposite side of Throwley Way. Discussions between TfL, LBS Highways and the Applicant are on-going to determine mitigation that is appropriate and proportionate to the proposals and in light of LBS LPA's wider proposals for the highway network.

Design South East (as LBS LPA's Design Review Panel)

The design of the development has evolved through considerable discussion with and subject to the scrutiny of Design South East, the independent Design Review Panel ("DRP") for LBS LPA. Two design review panels were held during the pre-application process. The first session was held on the 17th August 2023 and a subsequent follow-up session held on the 8th November 2023. Notable design changes were made to the scheme in between the two sessions and in particular in relation to the maximum heights of the proposed marker buildings, which were reduced in scale.

This engagement has contributed to the design evolution of the scheme, which through peer review and collaboration will deliver a high-quality development that will make a positive contribution to Sutton. The concluding feedback received and matters agreed / supported by the DRP can be summarised as follows:

- I. The proposed density of development and housing mix achieve a good level of residential quality.
- II. The indicative layouts work well, to include the core locations and resulting high percentage of dual / triple aspect homes.
- III. There is a clear architectural diagram for having two marker buildings on either side of the mid-rise blocks.
- IV. The primary marker building is convincing in terms of treatment, shape and form. There is townscape justification for it, and the space around it plus its role in depicting the route through to the High Street creates a place-making case for its presence also.
- V. The reduction of massing of the new build element of Market House is positive and helps in views from the High Street.
- VI. The rationalisation of car parking along Elm Grove is very positive and results in a significant improvement of the public realm.
- VII. There is opportunity for quality and functional spaces to be delivered within the east-west diagonal route.

Pre-Application Stakeholder Feedback Matrix (March 2024)

The below matrix provides an overview of the feedback received during the pre-application process from the formal stakeholders on the emerging proposals for the regeneration of Elm Grove Estate and retention, refurbishment and extension of 216-220 High Street. It provides a reference point for some of the key planning considerations and identifies the positions reached with Officers / DRP following an extensive process of engagement.

Key:

- **Green** – Agreement / support obtained
- **Orange** – In principle agreement / support subject to the information expected to be demonstrated and secured through the Outline Planning Application.
- **Red** – Outstanding

Planning Consideration	LBS Officers	GLA Officers	Design South East (DRP)
Principle of Development	<ul style="list-style-type: none"> The principle of development to re-provide and increase the number of residential units on the site from the number noted in the Local Plan is accepted. 	<ul style="list-style-type: none"> The proposed redevelopment would secure a net increase in existing affordable housing floorspace on a like-for-like tenure basis and would at this stage broadly accord with the Mayor's key principles for estate regeneration schemes. As such, the redevelopment proposals could be supported in principle. 	<ul style="list-style-type: none"> Supportive of the principle of intensification in a sustainable location. It will provide much needed new housing and regenerate an existing residential estate.
Masterplan and Layout	<ul style="list-style-type: none"> Supportive of block layout and orientation based on masterplan approach, inclusive of east-west diagonal link. The increase in the active frontage along Throwley Way is particularly welcomed. 	<ul style="list-style-type: none"> East-west diagonal link, welcomed and positive step in celebrating the public realm. The move to include the northern passageway to include the High Street within the redline is supported as it would contribute to the wider integration of the scheme and enhance the legibility and safety of the development. Supportive of ground floor use and residential entrances fronting onto the main public realm/ diagonal route which would provide a good level of animation and natural surveillance at ground floor. In particular, the main public realm (diagonal route) is overlooked by entrances, front gardens and balconies. 	<ul style="list-style-type: none"> The changes to parking and Elm Grove are very positive and a significant improvement to enhance provision for pedestrians, and improve what is currently a very untidy service road. The success of the delivery of the scheme will be determined through performance indicators such as cycling mobility and accessibility through the site for younger users. The quality and functions of space within the east-west diagonal route have the potential to be great. Indicative layouts work well, to include the core locations and high % of dual aspect provision supported.
Height and Massing Hierarchy	<ul style="list-style-type: none"> Supportive of the massing strategy and hierarchy of height across the Site as a whole in terms of keeping heights low along the central east-west boulevard (generally mid-rise plus low-rise blocks) and increasing the massing as the 	<ul style="list-style-type: none"> Agreement that Taller Marker buildings + Lower mid-rise buildings succeeds in creating a legible group of building in principle (rather than 'flat', bulky and overbearing family of mid-rise of Strategic Option 2). 	<ul style="list-style-type: none"> Clear architectural diagram for having two marker buildings on either side of the blocks. The primary marker building is convincing in terms of treatment, shape and form as there is a clear

Planning Consideration	LBS Officers	GLA Officers	Design South East (DRP)
	development radiates north, east and south (generally mid-rise block with two marker elements).	<ul style="list-style-type: none"> Distribution of height overall is sensible, locating the taller elements along Throwley Way, and retaining lower heights closer to the smaller scale buildings/ finer grain of the High Street to the west. 	reading of it against the courtyard block.
Location of marker buildings	<ul style="list-style-type: none"> The place-making and way-finding rationale for the positioning in the “taller” elements at the northern end of the Site and adjacent to Benhill Avenue is recognised and considered to have architectural merit. 	<ul style="list-style-type: none"> Welcomed that the applicant team took GLA feedback on board amending both the justification and the focus of height and locations of the marker buildings which is supported. The taller elements help to add interest to the height profile and the location of the primary marker building at the junction is supported. 	[Covered by rows below and above]
Primary marker building – maximum height	<ul style="list-style-type: none"> Reduction in height to a maximum of 16 storeys welcomed. The location of the primary marker building at the end of Benhill Avenue considered appropriate and to sit comfortably. 	<ul style="list-style-type: none"> The amendments to the height and massing of the primary marker building to a maximum of 16 storeys welcomed. The footprint appears more slender and the architectural language has been further developed. 	<ul style="list-style-type: none"> The 16 storey version of the primary marker building is much more successful and convincing. It is agreed that there is a townscape argument for it. The space around it and its role in depicting the route through to the High Street creates an place-making case for its existence.
Secondary marker building – maximum height	<ul style="list-style-type: none"> Reduction in height welcomed. Maximum height of 13 storeys supported in light of the relevant height context in views to the north and the positive DRP feedback. 	<ul style="list-style-type: none"> Building of 13 storeys considered appropriate within its existing and emerging context, in encouraging “taller” elements rather than distinct “tall” buildings which raise the height significantly. 	<ul style="list-style-type: none"> The secondary marker building at 13 storeys reads as a contextually responsive approach within the townscape and emerging height hierarchy.

Planning Consideration	LBS Officers	GLA Officers	Design South East (DRP)
Market House new-build element – maximum height	<ul style="list-style-type: none"> The reduction in height of the proposed extension to Market House is welcomed and in-keeping with the wider masterplan. The revised approach to massing and set-back of top storey of the new build element (as per the Illustrative Masterplan) appears improved in both the north and south views as well as when looking east. 	N/A	<ul style="list-style-type: none"> The moves made in reducing the massing of the new build element of Market House are positive and help in views from the High Street. Remodeling the top floor has given a more positive relationship with Elm Grove and High Street.
Elevational Treatment / Architectural Detail	<ul style="list-style-type: none"> The articulation of the marker buildings as being architecturally distinct from the shoulder buildings is considered to be an appropriate response. The strategy of both marker buildings having a similar palette of materials, window articulation, balcony strategy and articulation of the “crowning” of the top two storeys is supported. The double storey glazing marking the entrance for the primary marker building is an essential design element, emphasising the architectural significance of the building within the development, and helping to provide active frontage on two elevations at ground level. The use of contrasting tones for the shoulder buildings is considered acceptable. 	<ul style="list-style-type: none"> Broadly supportive of the architectural approach. The use of robust brick is in keeping with the context. The approach to retain a different language/tonality for the marker buildings is supported, and it helps retain consistency across the two blocks. Encouraged that there is some commonalities shared across the buildings to make sure they are all part of the same family. For the taller element the simple articulation is supported, which follows a clear 3-tier strategy; base, middle and top. The 4-storeys grouping for the horizontal banding is a good option, as it alleviates the impact of scale and avoids a cluttered appearance 	<ul style="list-style-type: none"> Supportive for the framed approach to the two set-back storeys of the primary marker building in terms of architectural treatment of “taller” elements. The design approach to the primary marker building is convincing. It is successful because in the way it comes to the ground, turns the corner, and defines a route. It is moulded to reinforce those aspects as part of a composition, which means it makes a clear reading of a courtyard block with a marker building abutting it. Encourage the applicant team to think about the architectural treatment of the secondary marker building. It is not like the primary marker building and related much more to the courtyard building in which it is attached.

Planning Consideration	LBS Officers	GLA Officers	Design South East (DRP)
	<ul style="list-style-type: none"> Final details for the materials will be controlled by the Design Code and the submission of details via the Reserved Matters Approval process, but there is a strong preference to use brick and this should be incorporated in the material palette. 		<ul style="list-style-type: none"> Bringing activity down towards the street, such as expressing the base as double height spaces, possibly within small recesses, which incorporate the windows and living areas at first floor should be explored. The buildings require different approaches because they serve different purposes, their proportions are different and the ground floors perform different functions.
Housing Mix (incl. Affordable Housing)	<ul style="list-style-type: none"> Indicative housing mix generally accepted, subject to provision of planning and market justification for proposed level of three bedroom family homes being below policy requirements. Recognition that the indicative mix needs to be considered in light of the town centre location and commitment to providing 50% affordable housing. The mix of units in the affordable tenure is a matter for the housing manager to advise on based on current housing needs. The affordable rent to intermediate split is considered to be acceptable. Agreement to securing minimum and maximum % ranges for units types through the Development Specification Statement. 	<ul style="list-style-type: none"> "Ticking the key estate regeneration boxes", to include replacement affordable floorspace plus uplift; right to return for existing tenants; and a Landlord Offer which provides shared equity and shared ownership home swap options for existing owners. Broadly comfortable with the indicative mix currently set out as informed by returning resident needs first and then local needs subject to LBS agreement and justification through the Outline Planning Application on the proposed quantum of larger family homes (3-bed+). 	<ul style="list-style-type: none"> No specific comments on the proposed housing mix other than it appears to be achieving a good level of quality.

Planning Consideration	LBS Officers	GLA Officers	Design South East (DRP)
Housing Quality (and Density)	<ul style="list-style-type: none"> High % of dual / triple aspect units is considered acceptable on a development of this density and within expectations as comparable to other recent planning permissions in Sutton Town Centre. All units are meeting or exceeding London Plan standards (as per the Illustrative Masterplan). Despite shorter separation distances than the traditional 18-21m (which cannot be generically applied to urban / town centre sites), the illustrative scheme shows that careful planning of layouts can be used to avoid excessive overlooking and protect privacy. Levels of daylight and sunlight within the scheme will meet the minimum BRE targets and considered consistent with the town centre location, reflecting the high density character of the proposed development. Balcony strategy, comprising a mix of inset balconies, projecting balconies and external walkways is considered acceptable. 	<ul style="list-style-type: none"> No more than 8 units per core which is supported. Welcomed and supportive of the high % of dual / triple aspect homes as measured in line with recently adopted Housing Design Standards LPG. The revision to ensure maximise the number of dual / triple aspect wheelchair units strongly supported. Support for the development of the access and security strategy for the scheme in engagement with Secured by Design. 	<ul style="list-style-type: none"> The high % of dual / triple aspect and deck access approach is supported. Supportive of the overall approach to entrance cores, access and balconies, to having two courtyards, and the principle of the diagonal route dividing the development into more equal halves. No specific comments on the proposed density of development other than it appears to be achieving a good level of quality.
Play Space & Amenity	<ul style="list-style-type: none"> The play space strategy and provision of external amenity spaces is considered acceptable, subject to play space for 11-18 year olds being provided for via a committed sum to be spent on play provision in existing public spaces. 	<ul style="list-style-type: none"> Supportive of the public realm and landscape improvements that also enhance pedestrian and cycling movement. Generally comfortable with the play space strategy the Outline Planning Application to demonstrate that there is suitable existing 	<ul style="list-style-type: none"> Good levels of daylight / sunlight amenity to external amenity spaces to be provided through the Outline Planning Application to show how these perform when they will be most utilised (eg. when children want to play after school).

Planning Consideration	LBS Officers	GLA Officers	Design South East (DRP)
	<ul style="list-style-type: none"> The additional planting and seating provided at the western end of the diagonal public route is welcomed. 	<p>off-provision for older children (12+ years old) within a safe walking distance.</p> <ul style="list-style-type: none"> Encouragement to integrate playable structures, and other ways to make the environment safe and attractive to young people within the public realm. The proposal includes defined defensible boundaries for private residential ground floor entrances located at the main diagonal route. Front gardens create a strong street scene and sense of ownership. These are supported. Strongly supportive of the range and generous provision of outdoor private communal courtyards and rooftops, as well as the required private outdoor amenity space. The thresholds between private and public are well thought out with a railing boundary and low planting that provides clear definition and allows for visual connection 	<ul style="list-style-type: none"> Further detail required on how the needs of 12+ will be met off-site and through informal provision on-site.

Planning Consideration	LBS Officers	GLA Officers	Design South East (DRP)
Car Parking	<ul style="list-style-type: none"> • Parking requirements understood in terms of meeting existing returning resident needs as part of the Landlord's Offer and commitment to returning residents. • Support of the otherwise car-free proposals, with the exception of meeting blue badge requirements. • Rationalisation of parking along Elm Grove welcomed. • Outline Planning Application to demonstrate that resident car parking spaces could be reduced / re-purposed over time should demand change. 	<ul style="list-style-type: none"> • The rationalisation of the parking is positive, and broadly enhances the public realm quality at ground floor level. • Accept that existing returning residents need to be re-provided with a space provided measures are taken to ensure that general spaces are not available to new residents, and that parking spaces decline over time, as existing residents leave. 	<ul style="list-style-type: none"> • Rationalisation and reduction of parking within Elm Grove through a creative approach to parking and re-purposing of existing rear of high street spaces to more successfully integrate within the public realm welcomed.

Appendix 8

Outline Permission and Section 73 Scheme Comparison Matrix and latest Parameter Plans (HTA, March 2025)

Item	The Planning Permission	Section 73 Scheme (as sourced from DRP1 Accommodation, February 2025)
Housing Numbers	<p>Total = 282 (maximum parameter)¹</p> <p>Social Rent Replacement – 57</p> <p>London Affordable/ Social Rent – 73</p> <p>Shared Ownership – 10</p> <p>Market – 142</p> <p>Total = 282 (19,135sqm/779hr)</p>	<p>Total = 279</p> <p>Social Rent Replacement – 57</p> <p>London Affordable/ Social Rent – 80</p> <p>Shared Ownership – 3</p> <p>Market – 139</p> <p>Total = 279 (18,807sqm/ 791hr)</p>
Housing Mix	<p>1Bed – 122</p> <p>2Bed – 137</p> <p>3Bed – 23</p> <p>In accordance with Condition 8² of the Planning Permission.</p>	<p>1Bed – 121</p> <p>2Bed – 134</p> <p>3Bed – 24</p>
Flexible Class E/ Class F2 Community Use/ Sui Generis (Music Venue)	580 (GIA) sqm	580 (GIA) sqm

¹ The delivery of units within the outline area is controlled by conditions of the Planning Permission, namely, Condition 8 (maximum unit number and unit mix). Within the envelope of the permitted parameters there is some scope to amend the unit mix via reserved matters application(s) which may alter the total unit numbers accordingly.

² Planning Permission Condition 8 states: 1 Bed – 23-43%; 2-Bed – 29-49%; 3 Bed – 5-8%.

Public Open Space, Public Realm and Communal (private) Amenity Space and Private Amenity	1,735sqm Public Open Space, Public Realm and Landscaping ³ 1,575sqm Communal (private) Amenity Space 1,846sqm Private Balconies, Terraces and Gardens	1,515sqm Public Open Space, Public Realm and Landscaping 1,909.6sqm Communal (private) Amenity Space 2,321.8sqm Private Balconies, Terraces and Gardens
Play space and dedicated amenity space	Doorstep and older children play provision ⁴ .	632sqm 0-4 years play space and 461sqm 5-11 years play space provided on site

³ As secured by Planning Permission Condition 12 and 50 and identified on Hard and Soft Landscape Parameter Plan 4.

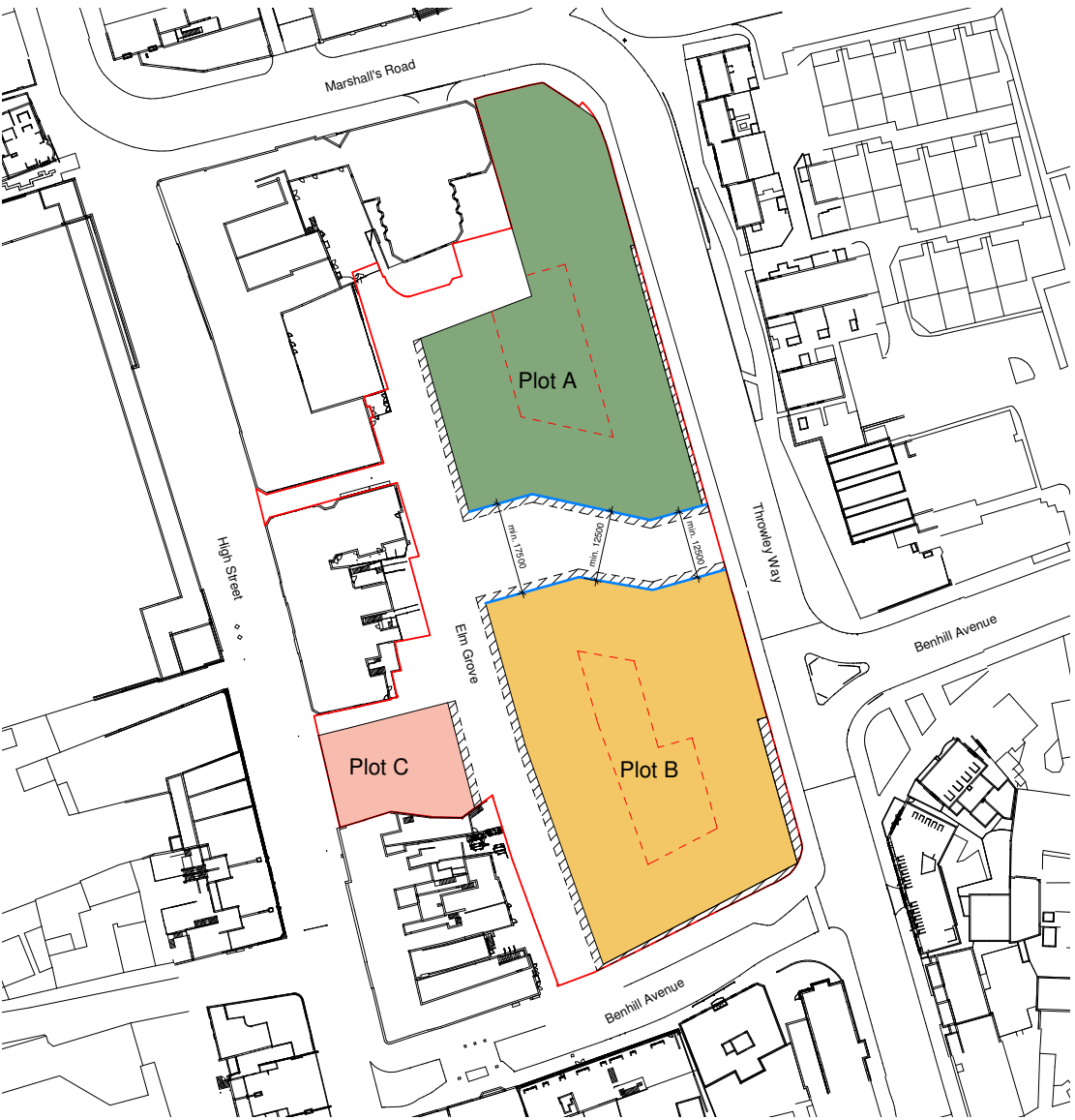
⁴ As secured by Planning Permission Condition 39.

(Indicative) Proposed Parameter Plans

Development Zones

- The current parameter plan comprises 3 plots - Plots A to C. Plots A and B are defined by the proposed diagonal pedestrian route, with Plot C representing Market House.
- The HTA proposal results in the creation of a new Plot D for the tall building, which is separated from Plots A and B (which are reduced in size) by the new east/west routes.
- Plot C remains unchanged.

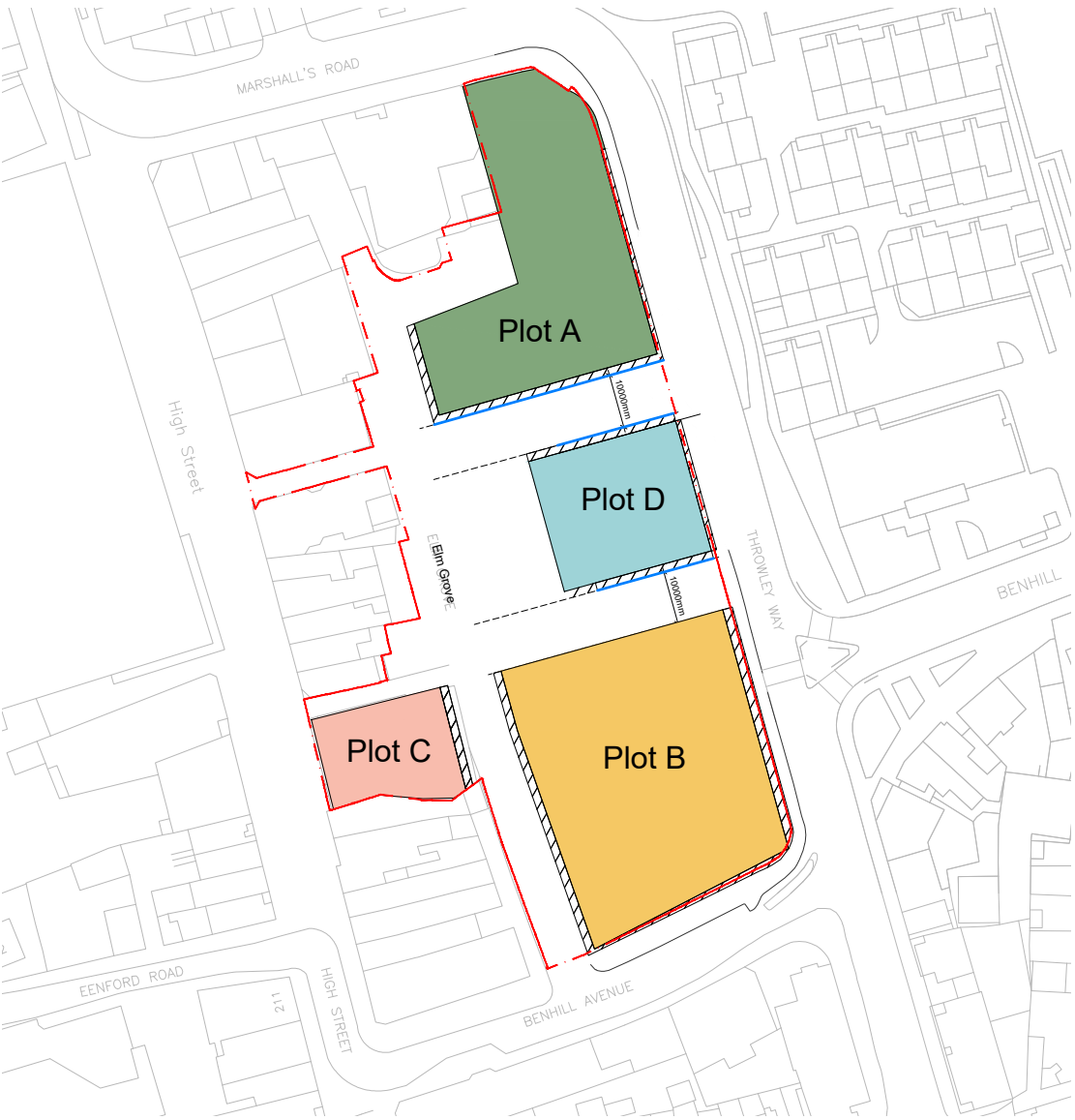
Consented Parameter Plan



Key

- Application Boundary
- Plot A
- Plot B
- Plot C
- Projection zone beyond the outer building footprint including balconies, winter gardens and bay-windows
- Maximum deviation on block width from outer development plot
- Minimum distance between faces of building
- Indicates a horizontal tolerance on plan of +/-3m as long as minimum distances between buildings at all levels are still met

(Indicative) Proposed Parameter Plan



Key

- Application Boundary
- Plot A
- Plot B



(Indicative) Proposed Parameter Plans

Building Heights

- HTA development falls within the maximum heights of the parameter plan, albeit in a slightly different configuration to reflect the siting of Plot D and the new east/west routes.
- The heights to the north east of the Site in Plot A can be reduced as a second taller building is not proposed in the HTA scheme

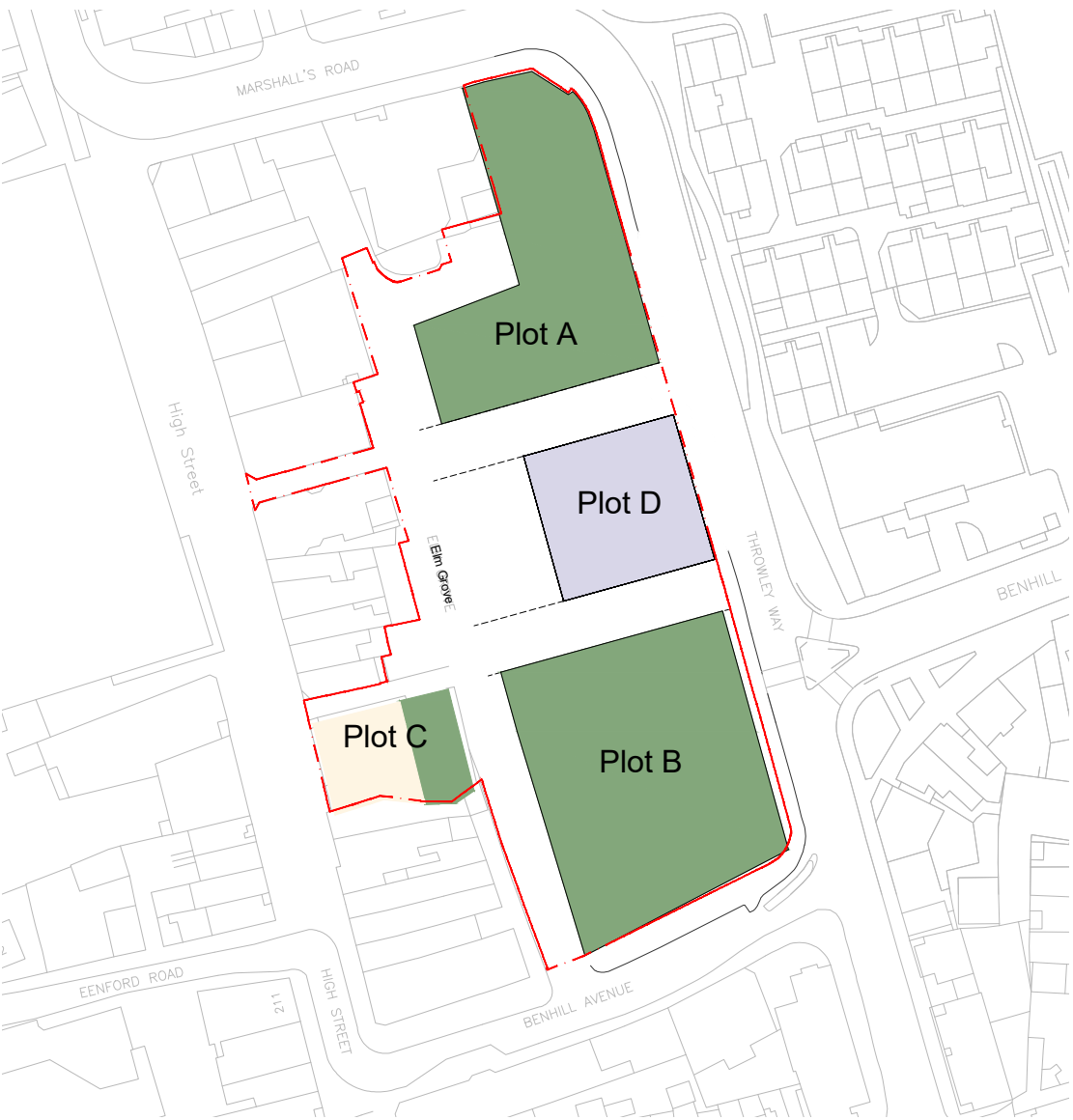
Consented Parameter Plan



Key

- Application Boundary
- Up to 16 storeys
- Up to 13 storeys
- Up to 6 storeys
- Up to 5 storeys
- Retention of existing building up to 3 storey (plus any inhabited roof space)

(Indicative) Proposed Parameter Plan



Key

- Application Boundary
- Up to 16 storeys fronting Throwley Way
- Up to 6 storeys
- Retention of existing building up to 3 storey (plus any inhabited roof space)

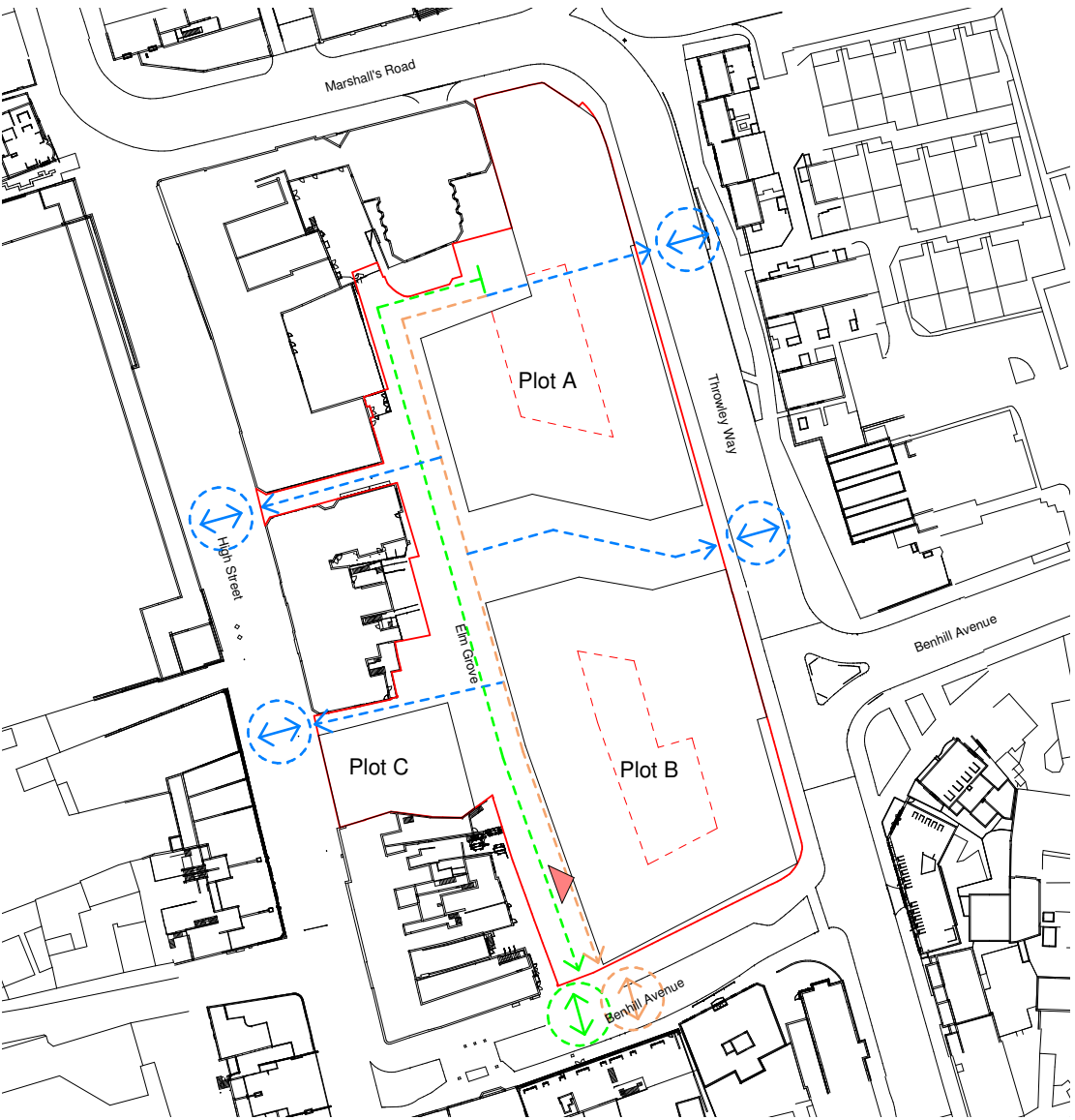


(Indicative) Proposed Parameter Plans

Access and Movement

- The core principles of the parameter plan continue to apply to the HTA scheme, albeit in a slightly different configuration to reflect the siting of Plot D and the new east/west routes.

Consented Parameter Plan



Key

- Application Boundary

Indicative proposed primary vehicular route

Indicative proposed pedestrian route

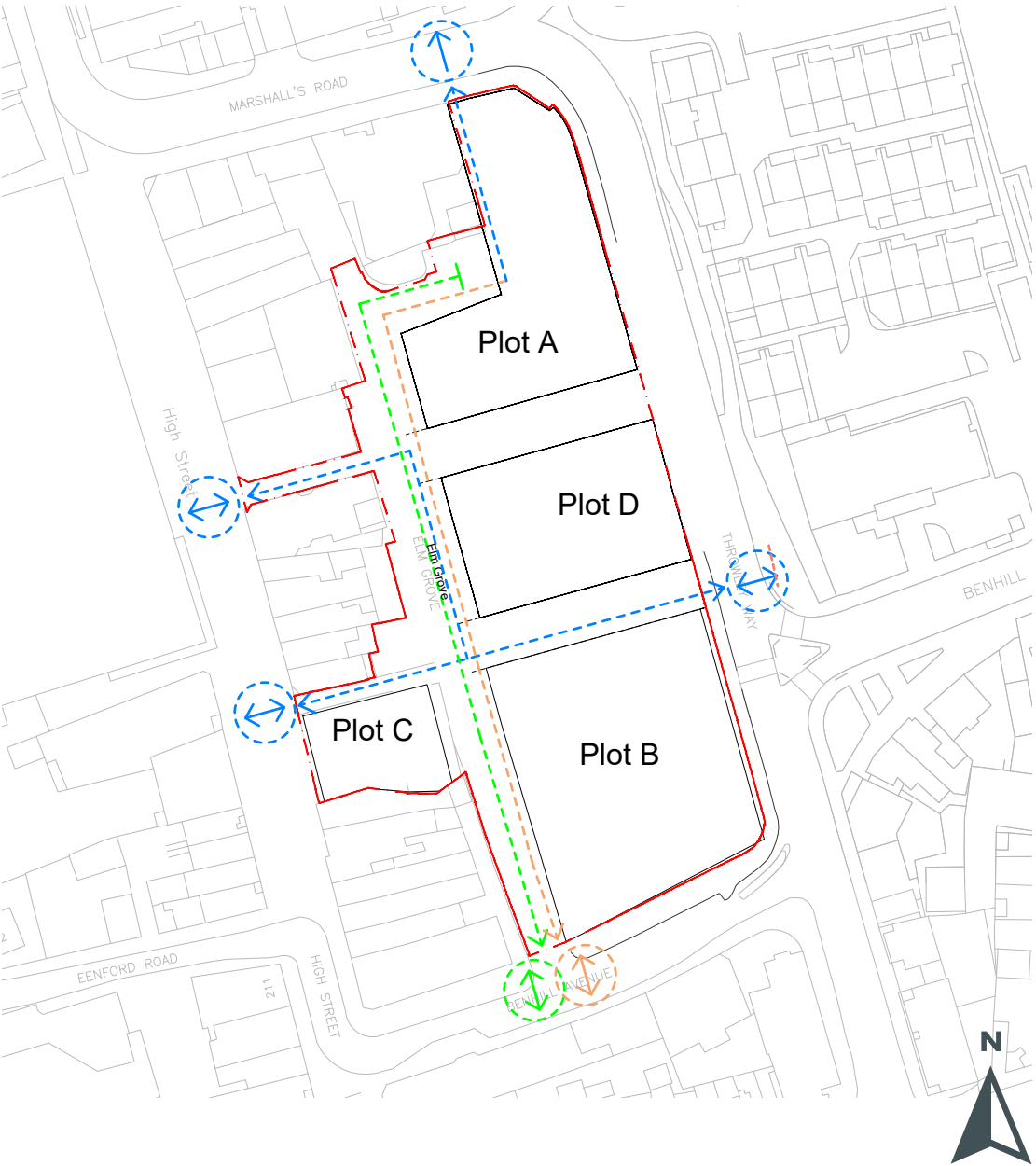
Indicative proposed pedestrian & cycle route
- Indicative proposed primary vehicular access

Indicative proposed pedestrian access

Indicative proposed pedestrian & cycle access

Podium Access

(Indicative) Proposed Parameter Plan



Key

- Application Boundary

Indicative proposed primary vehicular route

Indicative proposed pedestrian route

Indicative proposed pedestrian & cycle route
- Indicative proposed primary vehicular access

Indicative proposed pedestrian access

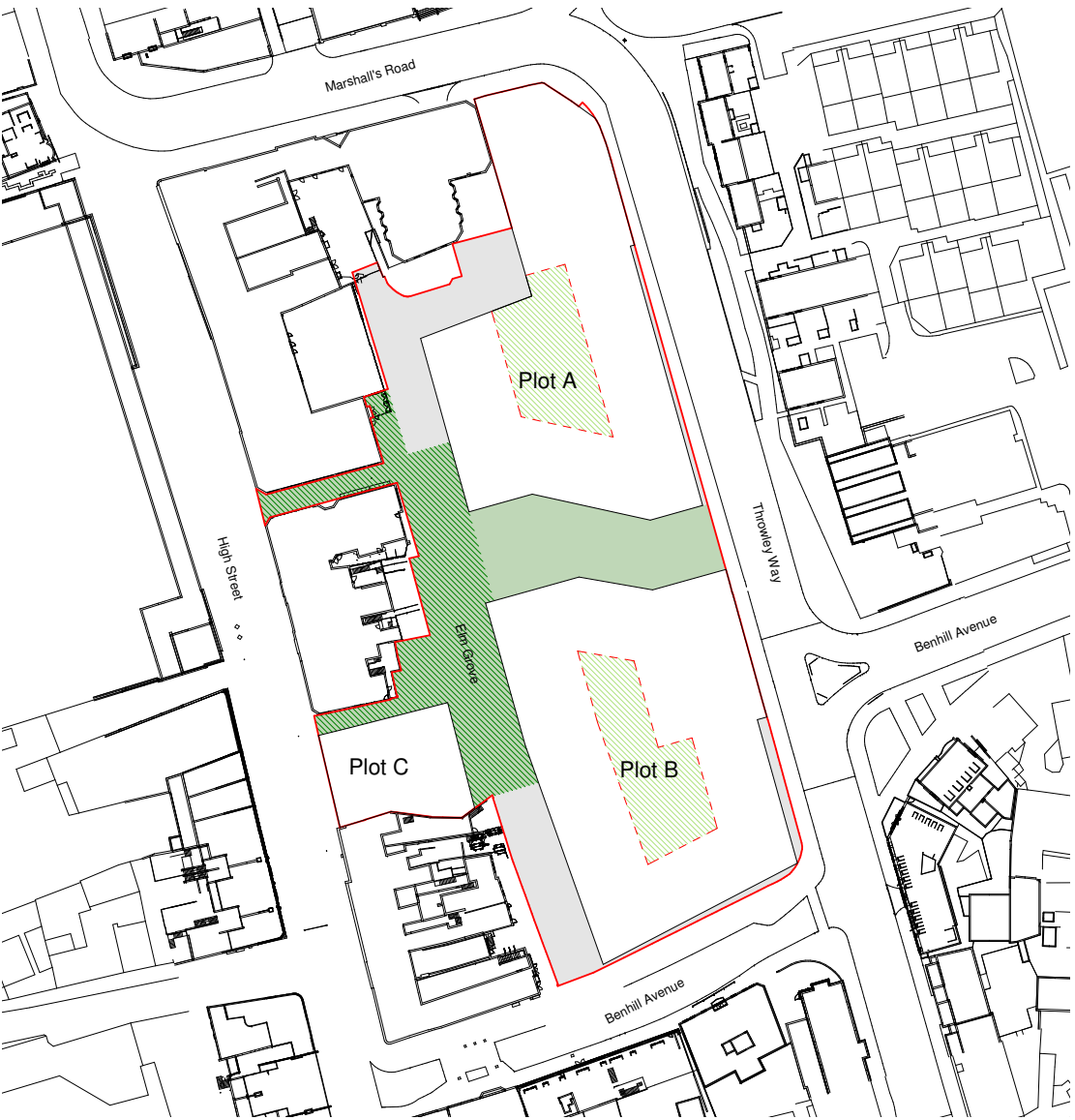
Indicative proposed pedestrian & cycle access

(Indicative) Proposed Parameter Plans

Hard & Soft Landscaping

- The core principles of the parameter plan continue to apply to the HTA scheme, albeit in a slightly different configuration to reflect the siting of Plot D and the new east/west routes.

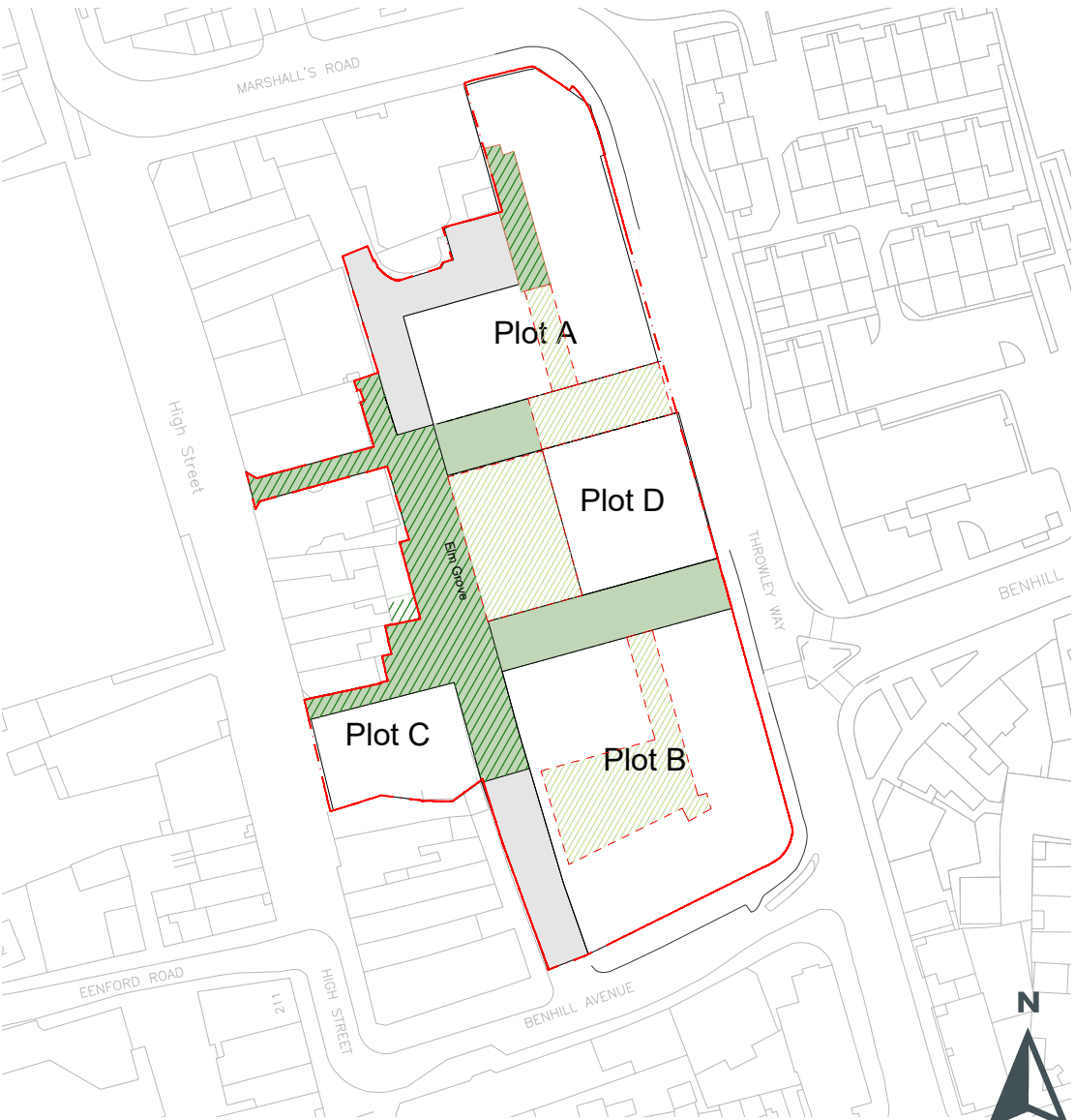
Consented Parameter Plan



Key

- Application Boundary
- Public Realm / Highway including landscape enhancements
- Proposed new public realm including landscape, amenity and play
- Proposed enhancements to existing public realm including landscape, amenity and play
- Indicative communal amenity space located at either ground or first floor level

(Indicative) Proposed Parameter Plan



Key

- Application Boundary
- Public Realm / Highway including landscape enhancements
- Proposed new public realm including landscape, amenity and play
- Proposed enhancements to existing public realm including landscape, amenity and play and private amenity
- Indicative communal amenity space located at ground level

(Indicative) Proposed Parameter Plans

Land Use (Ground Floor)

- The core principles of the parameter plan continue to apply to the HTA scheme, albeit in a slightly different configuration to reflect the siting of Plot D and the new east/west routes.

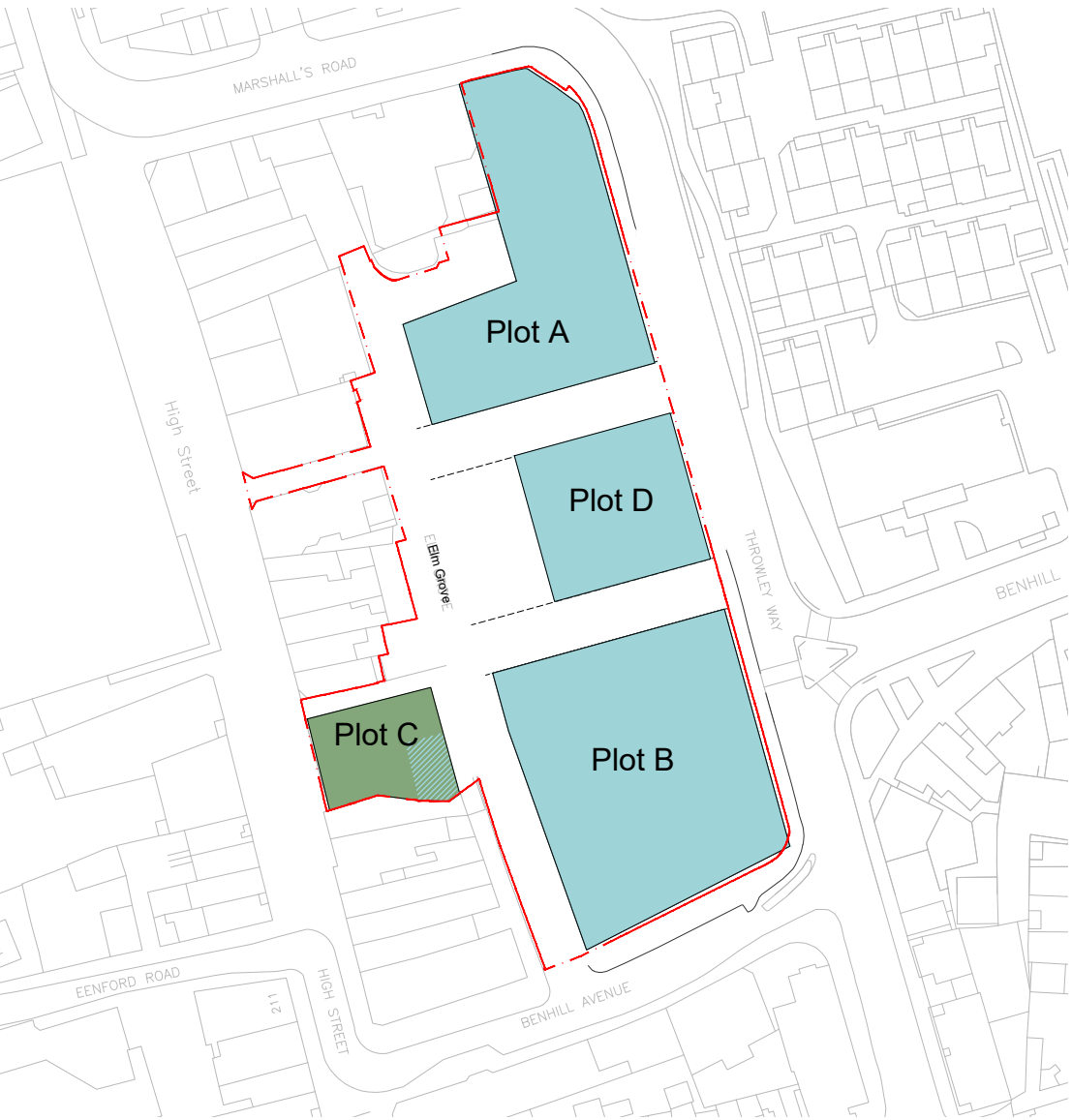
Consented Parameter Plan



Key

- Application Boundary
- C3 - Residential
- Flexible Class E/ Class F2 / Sui Generis
- Indicative lobby Area for Residential above

(Indicative) Proposed Parameter Plan



Key

- Application Boundary
- C3 - Residential
- Flexible Class E/ Class F2 / Sui Generis
- Indicative lobby Area for Residential above



(Indicative) Proposed Parameter Plans

Land Use (Upper Floor)

- The core principles of the parameter plan continue to apply to the HTA scheme, albeit in a slightly different configuration to reflect the siting of Plot D and the new east/west routes.

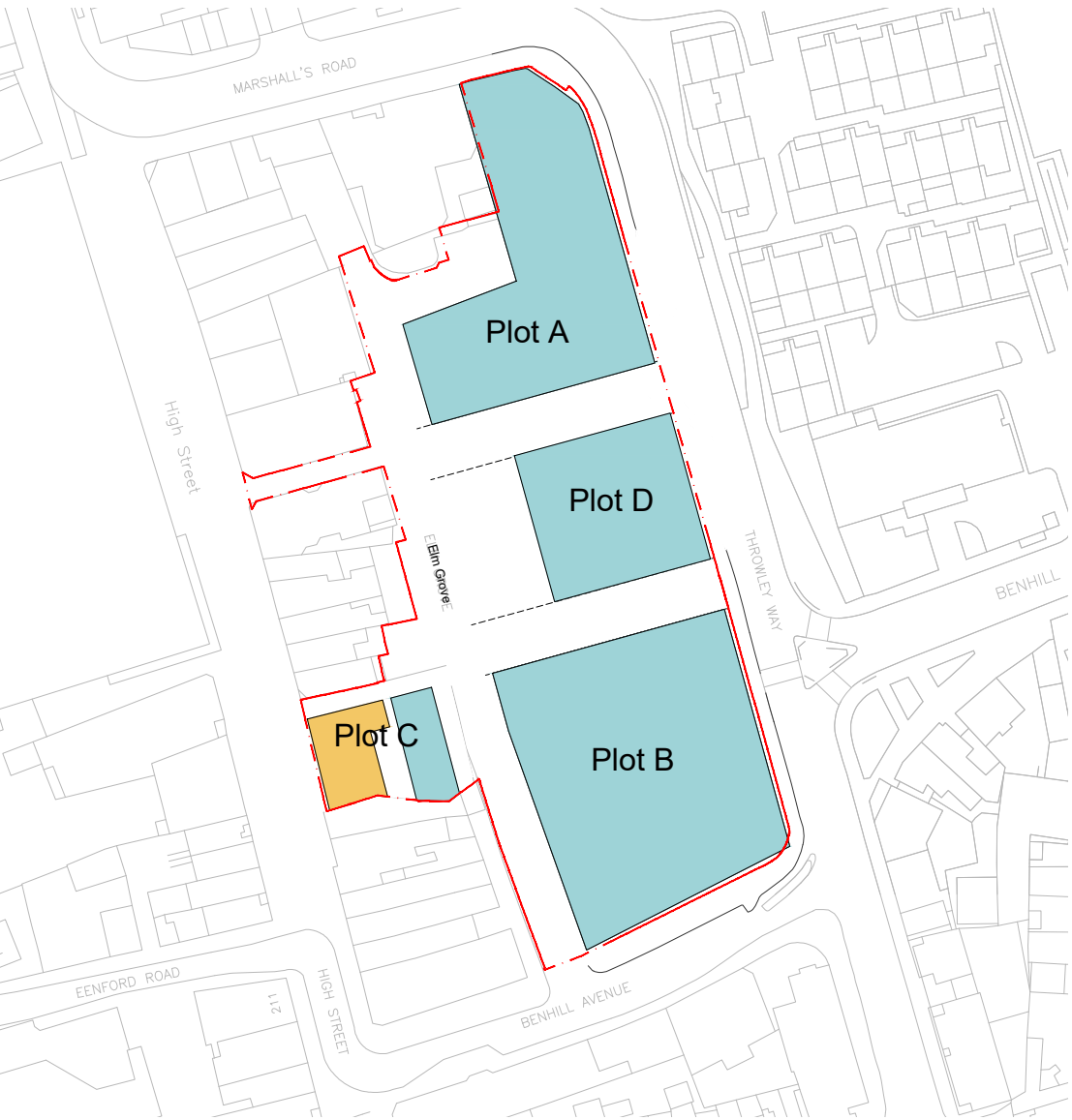
Consented Parameter Plan



Key

- Application Boundary
- C3 - Residential
- Flexible Class E/ Class F2 / Sui Generis

(Indicative) Proposed Parameter Plan



Key

- Application Boundary
- C3 - Residential
- Flexible Class E/ Class F2 / Sui Generis



Appendix 9

Detailed Policy Compliance Review

Key Planning Consideration	Relevant Development Plan Policies	Planning Commentary on Policy Compliance
Principle of Development and Site Optimisation	LP Policies SD1 and H8 SLP Policies 1 and 3 SLP Allocation STC45	<p>The principle of residential use on the Site is established by virtue of its existing use and its site specific allocation for residential-led redevelopment under STC45 of SLP. The principle of the Site's redevelopment for residential use, namely the regeneration of the existing Estate, is a well-established principle accepted by LBS LPA and GLA Officers as part of the extensive pre-application consultation and engagement process.</p> <p>The LP similarly recognises the important role of the redevelopment and intensification of existing housing estates. LP Policy H8, in particular, supports the demolition and replacement of existing homes, to include through estate redevelopment proposals, provided it results in a level of housing “...<i>at existing or higher densities with at least the equivalent level of overall floorspace</i>” (Part A). Supporting paragraph 4.8.1 promotes intensification of existing housing estates as a key future provider of new homes and affordable homes, in support of LP Policy H8. Housing optimisation at the Estate is therefore not disputed, as a principle.</p> <p>Where such proposals comprise affordable housing, there is an expectation under LP Policy H8 that all alternative development intervention options (such as refurbishment, infilling and partial redevelopment) must be explored first, and before demolition and replacement housing are pursued (Part C). Policy H8 goes onto state that the demolition of affordable housing will “...<i>not be permitted unless it is replaced by an equivalent amount of affordable housing floorspace</i>” and it must facilitate the right of return for existing residents (Part D). Such proposals should also seek to provide an uplift in affordable housing floorspace over and above replacement, subject to viability (Part E). These affordable housing matters demonstrating how the application proposals comply with LP Policy H8 (parts C, D and E, in particular) are set out later within this section.</p> <p>Full and due consideration has been given to alternative development intervention options in support of the case for regeneration and outlines the process (to include extensive and on-going consultation and engagement with existing residents) that has been undertaken before proceeding with proposals for the full redevelopment of the existing Estate, as part of this OPA. The details and process of this extensive resident consultation is set out in the SCI as submitted.</p> <p>The regeneration proposals are considered to create very significant economic, social and environmental benefits, all of which are considered to justify the proposed level of intervention. This conforms with Part C of Policy H8 and the further guidance contained within the Mayor's Good Practice Guide to Estate Regeneration (February 2018).</p> <p>The specific requirements of Parts D and E of LP Policy H8 are considered in further detail in the following sub-sections in quantifying the density and affordable housing offer of the Proposed Development but are addressed in summary, from a point of principle, below.</p>

	<p>The importance of this has only been emphasised further in the Government's recent announcements relating national planning policy and consultation on further changes (February 2024). This includes an expectation that all LPAs should prioritise brownfield developments and be more flexible in applying policies that may otherwise halt housebuilding on brownfield land, with significant weight to be given to the benefits of delivering as many homes as possible. This is an important material consideration to these proposals.</p> <p>SLP Policy 1 identifies a need to deliver over 6,405 new homes over the plan period 2016-2031 (427 homes per annum). The adopted London Plan (2021) requires the London Borough of Sutton ('LBS') to aim to deliver a minimum of 4,690 new dwellings between 2019/20 and 2028/29. It is noted that this target is expected to increase. The recently published review into the London Plan ordered by Secretary of State Michael Gove (February 2024), confirms that since 2019 (the beginning of the current LP period), the delivery of net homes in London has been less than 38,000 resulting in a shortfall of around 60,000 homes and with only four London boroughs meeting or exceeding their ten-year target. If delivery consistently continues at this unperforming rate, the review has identified that by 2028/2029 there would be a shortfall of more than 150,000 homes (29% of the total target). There is therefore clearly significant pressure for London and at borough level to seek to maximise housing delivery through brownfield site optimisation where it is located in a highly sustainable location.</p> <p>It is also noted that the Local Housing Need figure for the borough based on the standard method for assessing housing need has nearly doubled from that currently accounted for within the SLP (427 new homes per annum), at 886 new homes per annum (noting this is need and not target).</p> <p>In terms of affordable housing, the SLP outlines that the number of affordable homes being built is falling. It identifies that there is a net requirement of 1,018 homes per year over the plan period. This net affordable need represents 238% of the plan's annualised housing target. The London Plan and specifically Policy H8 recognises the important role of the redevelopment and intensification of London's existing housing in the evolution of London and continuing to meet these identified housing needs.</p> <p>In order to achieve the targets identified, SLP Policy 1 explains how LBS LPA "<u>will allocate strategic sites for housing delivery, promote the redevelopment of Sutton Town Centre, including taller buildings in the Areas of Taller Building Potential, encourage the intensification of areas around Sutton Town Centre and the borough's District Centres where suitable.</u>"</p> <p>Sutton Town Centre and its Area of Potential Intensification is identified for the delivery of 55% of the SLP housing target. Whilst the Council's Annual Monitoring Report ("AMR") (2021-2022) confirms the consistent delivery of housing within the borough against targets, it does demonstrate that only 40% of this has taken place in the Town Centre. Therefore, resulting in a shortfall of 15% compared to the SLP Policy 1 objectives and directions for sustainable growth. This is also a further 5% of under delivery within the Town Centre from that reported in the previous AMR (2020-21) and sits against a 30% housing delivery rate across the 'Rest of the borough' which represents a 20% increase on the 10% allocation identified under SLP Policy 1. There therefore remains a clear discrepancy between where housing is needed and would be most sustainable, and where it is actually being delivered within the borough.</p> <p>Elm Grove Estate, is an existing housing estate which is subject to a strategic allocation in the SLP for residential-led regeneration, and identified to have capacity for an uplift in units. It is located within Sutton Town Centre and within the designated Area of Taller Building Potential, Area of Potential Intensification and Central Setting (focus for the highest densities). It therefore satisfies all the objectives set out under SLP Policy 1 as a suitable contributor to meeting the local housing needs within the primary location for sustainable growth.</p> <p>The AMR (2021-2022) recognises the renewal of the Estate as a key priority of the SLP and in particular outlines the "<i>ambitious plans</i>" which have been developed over time in consultation with residents, to include support at Resident Ballot and approval through HEB for the delivery of "<i>over 200 new larger homes with private open spaces</i>" (paragraphs 2.32- 2.33). It goes on to outline the potential developability of the Site between 2026 and 2028 in contributing to identified housing needs (Table 4.9). This explicitly acknowledges the opportunity for residential intensification on the Estate in order to optimise its potential and promote the effective use of land in line with national, regional and local objectives. This will not only facilitate the delivery of better housing for the current residents but also allow the Estate to deliver a significant net gain in housing to meet future needs for affordable (and market) housing in line with the Council's up to date Housing Register.</p>
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		<p>In light of the above, the Site's full redevelopment will make a significant contribution to the housing needs of the borough (particularly a significant quantum of affordable homes) on a highly sustainable brownfield site within Sutton Town Centre. The principle of redevelopment to provide replacement and additional housing is therefore considered to be acceptable in the context of LP Policies SD1 and H8 and SLP Policies 1 and 3.</p>
Residential Uses (Quantum and Density)	LP Policies D2, D3 and GG2 SLP Policy 7	<p>This approach to density in support of land optimisation is also evident through the adopted LP (2021) which removes the former LP Density Matrix along with any references to the application of density ranges. LP Policy D3 instead supports the implementation of LP Policy GG2 which seeks to ensure development is making the best use of land and promotes a design-led approach to site optimisation which majors on achieving contextually sensitive, high quality design in highly accessible locations, such as the Site. LP Policy D2 then sets out how the density of development proposals should consider the provision of future planned levels of infrastructure and be proportionate to the site's connectivity and accessibility by walking, cycling, and public transport to jobs and services.</p> <p>The LP emphasises therefore the real importance of making best use of London's land by using brownfield sites and intensifying the density and use of existing places, to include important estates such the Site. As noted above, this has only been reiterated again recently as a Government priority and with a renewed expectation placed on all LPAs to support such objectives.</p> <p>At a local level, SLP Policy 7 states that the Council will grant permission for new dwellings where the proposed density is suitable to the local character. In local policy terms, the 'Sutton Central Setting' is identified for "<u>very dense</u> development" and development expected under SLP Policy 7 to be based on the 'central' setting of the (former) London Plan Density Matrix. Based on the Estate's PTAL of 6a, and the average habitable rooms per unit, the target density range for the Estate is 215-405 u/ha (assuming 2.7-3.0 hr/unit).</p> <p>The Site's PTAL of 6a represents very good public transport accessibility (6b being the maximum as 'excellent') and as such according to the LP, high density development is considered appropriate in these well-connected, town centre locations. The STC Masterplan (2016) also recognises the role of high densities in creating activity and vibrancy within the town and identifies the Estate in having an important role to play within this.</p> <p>The proposals for full redevelopment will deliver 282 units which represents an uplift of 209 units, equating to a density of 317 u/ha. For the purposes of SLP Policy 7, and as a benchmark only given the subsequent removal of the London Plan Density Matrix from the adopted LP, the Proposed Development sits very comfortably <u>within</u> the target density range of the Site.</p> <p>In taking a design-led approach, the submitted Design and Access Statement and Heritage, Townscape and Visual Impact Assessment ("HTVIA") provide further detail on how the Illustrative Masterplan has been designed to respond to wider considerations, such as scale. The submitted technical impact assessments demonstrate the capacity of the Site's physical, environmental and social infrastructure, to include new and enhanced provision coming forward as part of the Proposed Development, in supporting the density of development proposed. Together, and in line with the above, these confirm the proposed density of the full redevelopment of the Estate would positively respond to policy expectations in light of its site specific context and provide an appropriate level of optimisation.</p> <p>The proposed density across the Illustrative Masterplan is therefore considered entirely appropriate for this highly accessible, town centre location and will be significant in delivering much needed replacement and new affordable (and private sale) homes. As set out above, there is a significant pressure to deliver new homes in the right places (to include town centre brownfield sites) to meet both borough and London-wide needs. High density development on previously developed land, such as the Estate, is essential to achieving this where considered appropriate within its context and commensurate with development impact, mitigation and enhancement. This Estate's regeneration represents a significant housing contributor in that context. The Proposed Development is therefore considered to accord with 128 and 129; LP Policies GG2, D2 and D3; and SLP Policy 7.</p>

Affordable Housing	<p>LP Policies H5, H6 and H8</p> <p>SLP Policies 8</p>	<p>LP Policy H4 sets a strategic target of 50% of all new homes delivered across London to be genuinely affordable and advises specific measures to achieve this which for major developments should be in accordance with the threshold approach set out under LP Policy H5. For estate regeneration schemes specifically, such as the Proposed Development subject to this OPA, Footnote 52 is clear that separate affordable housing requirements as set out under LP Policy H8 are applicable.</p> <p>LP Policy H8 (Part A) states that: the “<i>loss of existing housing should be replaced by new housing at existing or higher densities with at least the equivalent level of overall floorspace</i>”. It resists the demolition of affordable housing unless it is replaced by an equivalent amount of affordable housing floorspace, and affordable housing floorspace is re-provided on a “like-for-like” basis (i.e. Social Rent housing replaced with Social Rent housing where facilitating the right to return) and integrated into the development to ensure mixed and inclusive communities (Part D). If not facilitating a right to return, it may be provided as either Social Rent or London Affordable Rent housing. This re-provision is primarily based on affordable floorspace (with unit numbers and habitable rooms also a consideration) to ensure no overall net loss.</p> <p>Policy LP H8 goes on to state that all development proposals that include the demolition and replacement of affordable housing should follow the Viability Tested Route and seek to provide an uplift, where viable, in addition to re-provision (Part E).</p> <p>At a local level, SLP Policy 8 states that the Council will seek a minimum of 35% of all dwellings to be affordable on residential and mixed-use schemes. In seeking this, regard is to be given to economic viability and other scheme requirements. Reference in the supporting text is made to the Council’s Affordable Housing SPD (2020) which advises that this affordable housing requirement rises to 50% provision on public land. Paragraph 2.18 states that “<i>if schemes propose a lower level of affordable housing, it needs to be fully justified through site-specific viability assessments.</i>”</p> <p>With regards to tenure split, SLP Policy 8 also establishes that 75% of affordable units should be for social/affordable rent with 25% intermediate.</p> <p>However, SLP Policy 8 has been superseded in part by Policy H4 of the adopted LP which requires, in seeking to maximise delivery against strategic targets, that all major developments provide affordable housing following LP Policy H5 and the threshold approach, or provide a financial viability assessment to demonstrate the provision of affordable housing that can be provided. In particular, LP Policy H5 requires major residential schemes to deliver a minimum 35% affordable housing on-site or 50% where on public sector land. LP Policy H6 requires a minimum of 30% low-cost rented homes, as either London Affordable Rent (“LAR”) or Social Rent, a minimum of 30% intermediate products which meet the definition of genuinely affordable housing, including London Living Rent and London Shared ownership, the remaining 40% to be determined by the borough as low-cost rented homes or intermediate products based on identified need.</p> <p>There are a total of 57 existing affordable units which comprise 157 habitable rooms and cover an area of 3,040 sqm GIA. As a minimum and in accordance with LP Policy 8, this provision must be replaced as part the overall development, Estate-wide.</p> <p>In supporting the delivery of 282 units across the Site in total, the Illustrative Masterplan comprises a residential uplift of 209 units, 573 habitable rooms and 15,196 sqm of floorspace.</p> <p>As part of this a total of 140 affordable units are proposed (including replacement provision) and comprise a total of 415 habitable rooms and 10,033 sqm of floorspace. This equates to a 52% affordable provision Estate-wide based on floorspace which meets and exceeds local and regional policy expectations as public sector land.</p>
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Compared to the existing provision, this represents an uplift of 83 affordable units, 258 habitable rooms and 6,993 sqm of floorspace, as shown in Table 12 below.

Unit Status	Tenure	Unit No, Floorspace and Habitable Room	% Split by Floorspace
Existing Units to be Demolished	Affordable / Social Rent	57 no. 3,040 sqm 157 hr	77%
	Private Leasehold (including Recently Purchased Freehold / Leasehold Properties (Voids))	16 no. 899 sqm 49 hr	23%
Proposed Units	Social Rent Replacement Homes	57 no. 3,540 sqm 163 hr	19%
	London Affordable / Social Rent	73 no. 5,932 sqm 227 hr	31%
	Shared Ownership	10 no. 561 sqm 25 hr	3%
	Private	142 no. 9,102 sqm 364 hr	47%
Net Gain	Social Rent Replacement Homes	0 no. 500 sqm 6 hr	3%
	London Affordable / Social Rent	73 no. 5,932 sqm 227 hr	39%
	Shared Ownership	10 no. 561 sqm 25 hr	4%
	Private	126 no. 8,203 sqm 315 hr	54%
TOTAL new-build units (replaced + uplift)		282 no. 19,135 sqm 779 hr	-
Affordable Total		140 no. 10,033 sqm 415 hr	52%
Affordable Net Gain		83 no. 6,993 sqm 258 hr	37%

In accordance with LP Policy H8, Part D, the Proposed Development overall will therefore ensure the replacement of equivalent affordable housing floorspace. In addition and in accordance with Part E, it will also result in an uplift in affordable housing provision in terms of floorspace, unit numbers and habitable rooms.

In terms of affordable tenure, on an Estate-wide basis, 41% of the affordable provision will come forward as Social Rent Replacement, 52% will come forward as London Affordable Rent / Social Rent with 7% as Shared Ownership based on total unit numbers. Whilst this does not wholly conform with the tenure split breakdown set out under LP Policy H6, the proposed tenure mix has been determined with consideration to the needs of existing returning residents as well as the wider needs of the borough and provides a notable provision of new and replacement genuinely affordable homes. When considered against SLP Policy 8, it achieves a split of 93% social / affordable rent and 7% intermediate unit types, well in excess of the 75% SLP tenure requirement for social/ affordable rent tenure in the borough. It is therefore considered entirely acceptable and provides a very significant contribution towards the borough's greater demand for low cost rented homes in the form of Social Rent and London Affordable Rent, in particular.

Furthermore, the tenure mix is indicative and will be fixed at the point of future RMAs to ensure an effective distribution of tenures and units mixes across the Estate as a whole to contribute to the creation of mixed and inclusive community. This includes Social Rent Replacement, London Affordable Rent and Shared Ownership homes as part of the affordable housing tenure mix alongside private market units. For the purposes of illustrating how this could be achieved, an Illustrative Tenure Distribution Plan has been submitted on the basis of the indicative unit mix for the OPA.

Overall, the Proposed Development on an Estate-wide basis therefore satisfies Parts A-D of LP Policy H8 in providing, as a minimum, replacement affordable floorspace of an equivalent amount and in Social Rent tenure to facilitate the return of existing residents. In addition, and in compliance with Part E of Policy H8, the proposals have been subject to viability testing and the submitted FVA in support of this OPA concludes that affordable floorspace provision as part of the Proposed Development is not viable. This includes both the re-provision and the "uplift" of affordable housing provision over and above replacement floorspace. However, the Applicant is fully committed to the proposed 52% affordable housing offer (based on floorspace) across the Estate in order to facilitate the delivery of good quality affordable new homes more generally within the borough which is a significant socio-economic and housing benefit in support of the proposals. In conclusion therefore, the proposals comply and exceed LP Policy H8 requirements (and exceed the 50% requirement set out under LP Policy H5 and SLP Policy 8).

Dwelling Mix	LP Policy H10 SLP Policies 3 and 9 SLP Allocation STC45	<p>LP Policy H10 states that “<i>schemes should generally consist of a range of unit sizes</i>” and Policy H10 provides a set of criteria which applicants and decision-makers should have regard to when determining an appropriate mix of unit sizes. This includes considering the following: the local needs and demands evidence base (such as a Strategic Housing Market and Local Housing Need Assessment); the need to achieve a mixed and inclusive neighbourhood; the nature and location of the site; the need to optimise the housing potential of the site; and, the need for family housing as well as the role of smaller one and two bedroom units in freeing up existing family housing. In this context, LP Policy H10 is clear that “...<i>a higher proportion of one and two bed units [are] generally more appropriate in locations which are closer to a town centre or station with higher public transport access and connectivity.</i>”</p> <p>SLP Policy 3 requires new residential development within Sutton Town Centre to deliver a unit mix comprising at least 25% three-bed plus dwellings “<i>unless it can be demonstrated that this would be unviable or the particular site circumstances are not suitable for family housing.</i>” Regard has also been had to LP Policy H10, which outlines a range of factors which should feed into the proposed mix, including the nature and location of the site, going on to state that a higher proportion of one and two bed units are generally more appropriate in locations that are closer to a town centre or station with higher public transport access and connectivity.</p> <p>The proposed unit mix that underpins the Illustrative Masterplan is indicative on the basis of a maximum residential floorspace of 19,135 square metres.</p> <p>The Illustrative Masterplan is underpinned by an Indicative Unit Mix (by size and tenure) (Table 13 below) and Indicative Unit Range Mix (%) (Table 13 below).</p> <p>The cumulative mix is only indicative on the basis that it includes a Maximum Unit Parameter per unit type (e.g. an upper limit in terms of size and tenure) this has informed the Indicative Unit Range Mix. It has underpinned the Illustrative Masterplan which for the purposes of the supporting baseline and impact assessments, provides a basis for testing and demonstrates how the Maximum Parameters can be applied to deliver a comprehensive regeneration scheme.</p> <p>Accordingly, the scheme will deliver 282 units overall comprising a mix of unit tenures and size as set out in Table 13 and within the indicative unit range (%), up to the maximum proportion as identified in Table 14 to ensure a mixed and inclusive sustainable community.</p> <p>The unit mix has been developed having regard to identified needs of existing and returning residents; adopted local policy requirements to include LBS’s most up to date housing needs; and current market demands.</p> <p>All homes are to be designed so that they meet the National Technical Standards, and the relevant Building Regulation standards. 10% of all homes, will be designed to be wheelchair accessible. Final unit layouts will be determined through future RMAs.</p>
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Table 13: Indicative housing size and tenure mix across Illustrative Masterplan

	1 Bed	2 Bed	3 Bed	Total
Social Rent Replacement Homes	36 no. 1,800 sqm 72 hr	10 no. 745 sqm 36 hr	11 no. 995 sqm 55 hr	57 no. 3,540 sqm 163 hr
London Affordable/ Social Rent	19 no. 1,164 sqm 38 hr	42 no. 3,456 sqm 129 hr	12 no. 1,312 sqm 60 hr	73 no. 5,932 sqm 227 hr
Shared Ownership	5 no. 251 sqm 10 hr	5 no. 310 sqm 15 hr	0 no. 0 sqm 0 hr	10 no. 561 sqm 25 hr
Private	62 no. 3,301 sqm 124 hr	80 no. 5,801 sqm 240 hr	0 no. 0 sqm 0 hr	142 no. 9,102 sqm 364 hr
TOTAL	122 no. 6,516 sqm 244 hr	137 no. 10,312 sqm 420 hr	23 no. 2,307 sqm 115 hr	282 no. 19,135 sqm 779 hr

Table 14: Indicative Unit Range Mix (%) across the Illustrative Masterplan

	1 Bed	2 Bed	3 Bed
Indicative Unit Range (%)	23% - 43%	29% - 49%	5% - 8%

The unit mix comprises a Maximum Parameter approach that could be delivered through the regeneration of the Site. This provides the decision-maker with a level of certainty in demonstrating that a mix of units (in term of both size and tenure) will come forward. It also ensures that there is sufficient flexibility at future RMA stage for the amount of units per type and tenure to be determined as part of the detailed design process on a phase by phase / plot by plot basis.

The starting point for the proposed indicative housing mix is the assessed housing needs of the existing residents of Elm Grove Estate, which has revealed a demand for larger two bedroom homes. This therefore determines the unit types of the replacement homes, with the “additionality” informed by up-to-date housing need evidence, to include current market trends, across both affordable and private sale tenures.

The latest housing need evidence for Sutton correlates in part with the needs of existing residents, identifying a greater demand for two-bedroom homes followed by one-bedroom homes. In accordance with LP Policy H10, the Site’s highly sustainable, town centre location means that these two unit types are generally more likely to be in-demand and more appropriate in meeting the needs of occupiers. Such locations are less suited to a high proportion of family units. This has been confirmed by LBS’s Housing Team, with the existing and projected housing list demonstrating a high demand for two-bedroom. Four-person homes at 31%. This is on the basis

		<p>that this unit type is considered to provide an alternative and more suitable form of smaller family housing in town centre locations.</p> <p>On this basis and in light of the identified needs of returning and new residents to the Estate, a 5-8% indicative unit range for three bedroom homes Estate-wide is proposed. This has been confirmed to be appropriate by LBS's Housing Team when considered in addition to the significant proportion of two-bedroom homes, at an indicative unit range of 29-49%. On the basis of the Illustrative Masterplan, this includes a 33% provision of two-bedroom, four-person homes which has been welcomed by the Council's Housing Team in response to identified local needs. Whilst this means the indicative unit mix does not meet the SLP Policy 9 requirement for 25% three-bedroom family homes, it is important to recognise the viability constraints that a significant provision of larger homes can pose on such town centre development sites when this is not reflective of up to date needs and demand analysis (and noting the policy requirement will have been based on pre-2018 housing evidence).</p> <p>In considering current market trends, regard has been given to other Sutton Town Centre schemes (as approved) where three-bedroom provision is generally between 5% and 10%. The Illustrative Masterplan and Maximum Unit Parameter for three-bedroom homes therefore sit at the higher end of this range.</p> <p>As set out, the indicative unit mix has a particularly healthy proportion of two-bedroom, four-person units which aligns proportionately with up-to-date housing needs and represents an appropriate form of "family homes" in this town centre location. In addition, a large number of the three-bedroom homes will be maisonettes, providing larger family homes at ground floor with direct access to gardens / terraces for returning residents consistent with the inclusion and accessibility expectations set out under "best practice" standard C1.5 of the Housing Design Standards LPG (June 2023).</p> <p>The indicative unit mix is therefore considered to align proportionately with up to date housing needs and market evidence when taking into account the site specific context, providing a suitable means of accommodation for a mix of occupier types, including smaller and larger families, and therefore compliant with LP Policy H10 and SLP Policies 3 and 9.</p>
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<p>Housing Design Standards and Quality of Accommodation</p>	<p>LP Policy D6 SLP Policy 9</p>	<p>LP Policy D6 states that “housing development should be of high quality design and provide adequately-sized rooms (see Table 3.1) with comfortable and functional layouts which are fit for purpose and meet the needs of Londoners without differentiating between tenures.” It then goes on to specify the key considerations that should inform proposals to ensure such quality can be achieved. This includes maximising dual aspect units, providing adequate daylight and sunlight and protecting the privacy of residents.</p> <p>LP Policy D6 also set outs minimum requirements for private internal spaces drawn from the nationally described space standards. The Housing Design Standards LPG (June 2023) states that homes are expected to be dual aspect unless there are compelling reasons why that cannot be achieved. Where single aspect dwellings are proposed, by exception, they should be restricted to homes with one or two bedspaces, should not face north and must demonstrate that the units will have adequate passive ventilation, daylight and privacy, and not overheat.</p> <p>There is no specific percentage target in planning policy terms for the level of dual aspect provision expected within new developments given site-specific circumstances will dictate what can be delivered. In high density urban developments, the provision of some single aspect units is considered to be unavoidable. The planning assessment therefore falls on whether the balance of multi-aspect to single-aspect ensures a good quality of internal residential amenity overall and compares favourably with other high density urban location developments having regard to the site-specific context.</p> <p>The design principles set out in the submitted Design Code and Design and Access Statement provide further details on the standards that should be applied to development within the OPA at the detailed design stages and these will guide the respective RMAs. This includes a requirement that all units will meet the nationally described space standards and the provision of dual aspect units will be maximised, with single aspect north facing units to be minimised in accordance with LP Policy D6 and the Housing Design Standards LPG.</p> <p>In demonstrating how the above can be successfully delivered across the maximum residential floorspace (GIA) of 19,135 square metres, the indicative unit mix which underpins the Illustrative Masterplan assumes, as a minimum, the nationally described space standards for each unit type.</p> <p>Table 15 below outlines the indicative target unit sizes applied to the indicative unit mix across the Illustrative Masterplan. However, it is important to note that this configuration remains indicative only at this stage with the specific unit sizes and arrangement of these to be subject to the detail that comes forward as part of future RMAs on a zone by zone / phase by phase basis.</p> <p>Table 15: Indicative Unit Layouts against Nationally Described Space Standards</p> <table> <tr> <th>Unit Type</th><th>Nationally Described Space Standards (sqm)</th><th>Proposed Indicative Unit Size (sqm)</th></tr> <tr> <td>1B2P Dwelling</td><td>50</td><td>53</td></tr> <tr> <td>2B4P Dwelling</td><td>70</td><td>75</td></tr> <tr> <td>2B4P Maisonette</td><td>79</td><td>94</td></tr> <tr> <td>3B5P Dwelling</td><td>86</td><td>94</td></tr> <tr> <td>3B5P Maisonette</td><td>93</td><td>104</td></tr> </table> <p>In keeping with the objectives of national, regional and local planning policy as well as LBS's commitment to improve the standard of residential accommodation across the borough as a whole, the Illustrative Masterplan shows how, through careful design, the Proposed Development presents opportunities for these minimum space standards to be exceeded and could achieve 81% dual or triple aspect units based on the maximum parameters. In turn, only 19% of homes are single aspect, of which none are north or south facing.</p>	Unit Type	Nationally Described Space Standards (sqm)	Proposed Indicative Unit Size (sqm)	1B2P Dwelling	50	53	2B4P Dwelling	70	75	2B4P Maisonette	79	94	3B5P Dwelling	86	94	3B5P Maisonette	93	104
Unit Type	Nationally Described Space Standards (sqm)	Proposed Indicative Unit Size (sqm)																		
1B2P Dwelling	50	53																		
2B4P Dwelling	70	75																		
2B4P Maisonette	79	94																		
3B5P Dwelling	86	94																		
3B5P Maisonette	93	104																		

	<p>In the number of instances where single-aspect dwellings are proposed, these are restricted to smaller one and two bedroom properties in accordance with standard C4.1 of the Housing Design Standards LPG which will ensure that these units will have adequate passive ventilation, daylight and privacy, and avoid overheating.</p> <p>When compared to the quality and standard of residential accommodation currently on the Estate, the above represents a significant improvement. The Options Appraisal (May 2021), prepared by Savills as part of the review of the development interventions options for the regeneration of the Estate identified that the existing homes are not fit for purpose. This is in terms of environmental performance, space standards and accessibility, and are inefficient in terms of layout with a high habitable room to unit type ratio. As such, they do not meet current living standards.</p> <p>The full redevelopment of the Estate through the Proposed Development therefore provides an opportunity to correct this and as shown through the indicative unit type layouts contained within the Design Code and submitted Design and Access Statement, all units will be expected to be legibly laid out and fit for purpose over the longer-term in line with NPPF 135. This will be applied to all tenures, to include both private market and affordable units to ensure a tenure blind approach to high residential quality design in accordance with LP Policy D6 and SLP Policy 9.</p> <p>To provide adequate privacy for every home, the Development Plots and Maximum Parameters have been established to ensure that development will achieve appropriate minimum separation distances both within the Estate and between facing windows of habitable rooms of nearby adjacent properties. This is demonstrated within Section 6.9 of the submitted Design and Access Statement. This is in accordance with SLP Policy 29 which states that Council will, amongst other things, take into consideration the effect of proposed developments in terms of overlooking causing loss of privacy, outlook and sense of enclosure.</p> <p>The formal written pre-application feedback from LBS LPA Officers confirmed that despite shorter separation distances being in place than the traditional 18-21m, the Illustrative Masterplan shows that careful planning of layouts can be used to avoid overlooking and loss of privacy.</p> <p>On a block by block and unit by unit basis, the internal layouts will be arranged to ensure that there is no direct overlooking between habitable rooms. The Illustrative Masterplan has tested how this can be supplemented by a variety of design measures, where required, and as explored with LBS LPA Officers during the pre-application process. This could include the staggering of windows to ensure they are not directly facing and the location of habitable rooms' window openings onto adjacent non-habitable / non-principal habitable rooms' window openings or cores. In addition, angled windows and obscure glazing can be incorporated along secondary frontages and/or screening implemented on adjacent balconies to ensure there is no direct risk of overlooking or loss of privacy whilst still maintaining sufficient levels of daylight and sunlight. This is in the interest of seeking to optimise the Site's potential, as supported by both LBS LPA and the GLA Officers, whilst respecting and protecting future and existing residential amenity in accordance with LP Policy D6, the Mayor's Housing SPG (March 2016), Housing Design Standards LPG (June 2023) and SLP Policy 29.</p> <p>The final unit layouts and requirement for any integrated design measures will be determined through the detailed design of the Development Plots and based on the configuration of built form alongside confirmed unit mix, in keeping with the Maximum Parameters. Such considerations will therefore be addressed and considered again in detail on a phased or plot basis as part of each RMA.</p> <p>On the basis of the above and the design principles secured through the submitted Maximum Parameters and Design Code, it is considered that the Proposed Development will provide a high quality living environment for both returning and new residents in accordance with LP Policy D6 and SLP Policy 9. It will contribute to an improved standard of residential accommodation across the borough's housing stock as a whole and therefore positively reinforce the role of planning and development in achieving this, as sought by NPPF 135.</p>
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Housing Accessibility	LP Policy D7 SLP Policy 9	<p>LP Policy D7 and SLP Policy 9(e) both require that at least 10% of new dwellings meet Building Regulation requirement M4(3) 'wheelchair user dwellings' with the remaining 90% meeting Building Regulation requirement M4(2) 'accessible and adaptable dwellings'. This means 10% of the units must be fitted out for wheelchair use from the first day of occupation, with the remainder capable of being adapted in future with only minimal changes to the layouts. The wheelchair units will be secured by condition as will the rest of the units being constructed to M4(2) standards.</p> <p>The Estate-wide approach to accessibility is set out in the submitted Design Code and Design and Access Statement and will be applied to the OPA through the design principles. These will require each future RMA to provide details of the number and distribution of wheelchair user dwellings proposed within that Development Plot and/or phase and demonstrate how this contributes to the delivery of 10% across the Estate as a whole. The Illustrative Masterplan shows one way in which these principles could be implemented across the Estate on the basis of the indicative unit mix and in securing a total of 28 wheelchair user dwellings. This demonstrates that the Proposed Development will contribute to satisfying the policy requirements of LP Policy D7 and SLP Policy 9 (e).</p>
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Non-Residential Uses (216 – 220 High Street)	LP Policies GG1, S1, SD6 and SD7 SLP Policy 18 SLP Allocation STC45	<p>LP Policy GG1 reinforces the above at a regional level, recognising that in building strong and inclusive communities, development must “provide access to good quality community spaces, services, amenities and infrastructure that accommodate, encourage and strengthen communities, increasing active participation and social integration, and addressing social isolation”. LP Policy S1 therefore resists the loss of social infrastructure, unless it is re-provided; forms part of wider public service transformation plan to meet future needs; or, sustains and improves other services.</p> <p>LP Policy SD6 (seeks, amongst other things, to promote the vitality and viability of London’s varied town centres by encouraging strong, resilient, accessible and inclusive hubs with a diverse range of uses that meet the needs of Londoners. LP Policy SD7 Part D states that development proposals should: 1) ensure that commercial floorspace relates to the size and the role and function of a town centre and its catchment; 2) ensure that commercial space is appropriately located having regard to Parts A and B of the policy and is fit for purpose; 3) support efficient delivery and servicing in town centres in a way that minimises negative impacts; and, 4) supports the diversity of town centres by providing a range of commercial unit sizes, particularly on larger-scale developments.</p> <p>SLP Policy 18 similarly promotes new town centre development within Sutton Town Centre which is suitable in terms of scale, role, function and character; makes the optimum use of the site; and, provides active frontages at ground floor.</p> <p>The Proposed Development will provide a maximum of up to 580 sqm of non-residential floorspace. This is proposed to take the form of the retention and refurbishment of the existing Music Venue (Sui Generis) at 216-220 High Street to continue to serve the local community and provide enhanced provision for the space currently located at the Ground Floor.</p> <p>In addition, the Proposed Development will retain and refurbish the existing floorspace located across First and Second Floors of 216-220 High Street to provide for Commercial (Flexible Class E) / Community (Class F2) uses. It will also introduce a new non-residential unit at Ground Floor, through a rear extension to the existing building and to provide additional space for Commercial (Flexible Class E) and Community (Class F2) uses and/or Sui Generis.</p> <p>Parameter Plans 5 and 6 confirms the proposed location of the non-residential floorspace within Development Plot C.</p> <p>Table 16: Non Residential Uses Proposed</p> <table><tr><th>Use Class</th><th>Existing Use (GIA)</th><th>Proposed Use (GIA)</th><th>Net Gain / Loss (GIA)</th></tr><tr><td>Sui Generis</td><td>244 sqm</td><td>243 sqm</td><td>-1 sqm</td></tr><tr><td>Flexible Class E / Class F2</td><td>506 sqm</td><td>337 sqm</td><td>-170 sqm</td></tr><tr><td>TOTAL</td><td>750 sqm</td><td>580 sqm</td><td>-171 sqm</td></tr></table> <p>Site Allocation STC45 identifies capacity for the delivery of non-residential floorspace, in the form of town centre uses, as part of the redevelopment of the existing Estate and indicatively refers to 281sqm. It was agreed with LBS LPA through the pre-application process that town centre uses within the Estate itself is not appropriate given the town centre uses, to include traditional retail units should be directed towards the Primary Shopping Frontage and High Street in accordance with SLP Policy 18. However, the inclusion of 216-220 High Street provides opportunity for the regeneration of the Estate to contribute to the delivery of new and improved town centre floorspace satisfying the objectives of both SLP Policy 18 and STC45.</p>	Use Class	Existing Use (GIA)	Proposed Use (GIA)	Net Gain / Loss (GIA)	Sui Generis	244 sqm	243 sqm	-1 sqm	Flexible Class E / Class F2	506 sqm	337 sqm	-170 sqm	TOTAL	750 sqm	580 sqm	-171 sqm
Use Class	Existing Use (GIA)	Proposed Use (GIA)	Net Gain / Loss (GIA)															
Sui Generis	244 sqm	243 sqm	-1 sqm															
Flexible Class E / Class F2	506 sqm	337 sqm	-170 sqm															
TOTAL	750 sqm	580 sqm	-171 sqm															

		<p>The original 216-220 High Street building, also known as Market House, will be retained to continue to serve the local community and provide an active frontage onto the High Street. In particular, noting the current occupation of the Ground Floor by Sound Lounge, a popular local music venue, which as per the Illustrative Masterplan will benefit from improved space and facilities to support its continued operation and better meet existing and future operational needs.</p> <p>In addition, a new unit will be created to the rear, through an extension to the original building (and involving some limited demolition of an existing later rear extension) and the existing non-residential floorspace on First and Second Floors refurbished and repurposed to allow for a diversification of uses in this town centre location. The intention is to allow for a multi-functional space which can more widely provide for the local community and businesses. The Illustrative Masterplan shows one way in this could be delivered which comprises the creation of a new active frontage onto Elm Grove and the existing movement route that runs directly north and connects to the High Street. This will provide improved natural surveillance and public realm in this location, providing an opportunity for “spill-out” space and increased community activity.</p> <p>Discussions are on-going with the existing occupiers of 216-220 High Street in regards to how the future space can be best designed and the types of activities, uses and events that the new provision could accommodate. This engagement will continue throughout the planning and construction processes, and ultimately inform the detailed design that comes forward for this phase / plot through future Reserved Matters Application(s).</p> <p>Overall, it is considered that the non-residential elements of the Proposed Development will be suitable in scale, role, function and character as a continuation of the existing offer but of an improved quality; optimise the use of the existing building through a diversification of uses with a town centre and community focus, including a mix of unit sizes to meet differing operator requirements; and provide active frontages at ground floor on all sides of the building, extending this from the High Street to Elm Grove. Thereby, wholly compliant and consistent with the objectives of LP Policies S1, SD6 and SD7 as well as SLP Policy 18.</p>
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<p>Design Approach (to include Tall Buildings Assessment)</p>	<p>LP Policies GG2, D1, D2, D3, D5, D6, D8, D9, G1, G4, G5, G6, G7 and S4 SLP Policies 3, 25, 26, 28, 29, 33 and 40 SLP Allocation STC45</p>	<p>LP Policies D1-3 and D8 apply to the design and layout of development whilst LP Policy D9 relates specifically to height and massing in the form of tall buildings. These policies are discussed in further detail throughout this section. In terms of overarching design considerations, LP Policy D1 outlines the importance at a local level of understanding the form and character of different areas in order to understand its capacity for growth. LP Policy D2 sets out the considerations that should inform the density of development in ensuring that it is sustainable and that there is adequate infrastructure in place or that it can be planned in accordingly.</p> <p>At a local level, SLP Policy 28 and SPD14 'Urban Design Guide' requires development to respect or reinforce the character and identity of the area and avoid developments which do not integrate well into the surroundings. Site Allocation STC45 contains a set of guiding principles for the redevelopment of the Estate and which, as such, seeks improved connectivity, active frontages, high quality design and the enhancement of the connection between the High Street and Throwley Way.</p> <p>The design principles set out in the submitted Design Code and Design and Access Statement seek to build upon the existing Estate's context to ensure the sensitive integration of future development within its surroundings. This is whilst recognising the emerging context being established through neighbouring development sites and the opportunity that the regeneration of the Estate provides in contributing to raising the standard of design more generally in an area, in accordance with NPPF 139.</p> <p>A design-led approach has been taken in order to understand the Site's capacity for growth and create a high quality new residential environmental. This has been informed by a detailed study of the surrounding form, character and architectural narrative in accordance with LP Policy D1 and as can be seen from the submitted Design Code, and Design and Access Statement and HTVIA.</p> <p>As set out in Section 3 of this Statement, it has been an iterative process underpinned by extensive discussions with LBS LPA Officers, Design South East and the GLA, as well as existing residents, the local community and key stakeholders. Careful consideration has been given to the comprehensive siting, scale and massing of the Proposed Development in relation to the existing street pattern and built form, the impact from key views and in relation to neighbouring heritage assets. This is in addition to retaining and creating areas of open space, public realm and pedestrian / cycle routes through the Site.</p> <p><u>Layout</u></p> <p>In developing the objectives of LP Policies D1 and D2, LP Policy D3 provides more detail on what is expected from a design-led approach to development. It provides a set of urban design principles that should guide development proposals and relate to form and layout; experience; and quality and character.</p> <p>At a local level, SLP Policy 28 states that new development will need to be “attractive, designed to the highest standard, especially with regard architectural detailing, and uses high-quality materials.” Policy 28 also sets out a number of design-led principles consistent with those identified under LP Policy D3. These expect development proposals to harmonise with the local context taking account of building plot sizes, street patterns, building lines and setbacks as well as the streetscape and architectural composition. Development will also be approved where it “respects the local context and responds to local character and heritage assets”.</p> <p>The comprehensive redevelopment of the Estate will involve the complete demolition of the existing Estate to provide two new residential plots, plus improvements and a rear an extension to 216-220 High Street as part of the third mixed-use plot. Massing will be concentrated along the eastern boundary of the Site to maintain a strong frontage onto Throwley Way, as sought through Site Allocation STC45 and the STC Masterplan. Unlike the conditions of the existing Estate, the Illustrative Masterplan however introduces active frontages at ground level along all streets and areas of public realm, resulting in a 59% increase compared to the existing Site. This provides improved opportunities for natural surveillance as well as high-quality and visually interesting streetscenes.</p> <p>The proposed block structure has been developed around the principle of this single “diagonal” east-west connection through the Site. The east-west connection provides a single movement route through Elm Grove Estate, joining the High Street immediately north of 234 High Street and featuring a diagonal link to connect to</p>
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Benhill Avenue to the south east. This connection is situated in-between two perimeter blocks around central courtyards, with two largely proportionate block structures to allow for effective phasing. In addition, two marker buildings will be located at key gateway locations along Throwley Way, the primary marker more centrally, fronting onto the end of Benhill Avenue and the secondary marker further north at the junction with Marshall's Road.

The proposed block structure has encouraged the opening up of the Site so that areas of more substantial public open space and public realm form part of the Illustrative Masterplan and support the strategic east to west, pedestrian connection through the Site. The Illustrative Masterplan ensures that the units along the east-west link are maisonette homes in order to create activity along this frontage and promote natural surveillance across the public realm.

The design approach therefore responds comprehensively to the aspirations of the STC Masterplan, in providing prominent "marker" buildings along Throwley Way whilst contributing to an improved pedestrian / cycle network within this part of the Town Centre (east-west and north-south).

The movement routes through the Site and careful placement of open space and public realm where they meet have been informed by identified desire lines within the area and seek to provide legible connections which are safe, secure and inclusive in accordance with LP Policy D3. This has been supported by the rationalisation and re-location of existing car parking along Elm Grove to allow for significant public realm and landscaping improvements across this north-south route and in prioritising pedestrian / cycle movement over and above the car.

The SLP does not impose a standard separation distance between buildings or between sensitive windows and there are no longer any prescriptive measures in the LP. As mentioned previously, SLP Policy 29 confirms however that the Council will, amongst other things, take into consideration the effect of proposed developments in terms of overlooking causing loss of privacy, outlook and sense of enclosure.

The proposed layout and block configuration has therefore been developed having regard to separation distances between new and existing properties as well as within the scheme itself in order to protect privacy, overlooking and outlook as required by with LP Policy D3 and SLP Policy 29. The Development Plots as established through Parameter Plan 1, have been configured to ensure new development can achieve an average separation of 16.9 m between facing habitable rooms within the proposed new blocks, across the ground floor courtyards and first floor amenity podiums. This will ensure adequate separation between new habitable room window openings.

In addition to the above, the Maximum Parameters ensure a minimum separation distance of 13 metres across the diagonal route between Plots A and B, as can be seen from Parameter Plan 1. This is in the interest of preventing overbearingness within the Site and particularly the central movement corridor as well as providing a building plot coverage which responds positively to the surrounding urban context as well as established street patterns. In accordance with LP Policy D3 and SLP Policy 29, it is therefore considered to result in a form and proportion that is legible and permeable at a human, street-based scale.

Overall, the distribution and clear characterisation of Development Plots amongst proposed landscaping, public realm and open space results in a clear definition of public and private environments. It facilitates movement through the Site and provides green and open space at convenient locations, creating a series of interconnected spaces and corridors, to encourage activity and social interaction as well as maximise opportunities for urban greening in accordance with LP Policy D3. Defensible green landscaping then provides appropriate setbacks between the public movement routes and new built form, providing softer edges. Together, this supports the integration of the Proposed Development with the existing urban built form with high quality, place making principles at the fore.

As is evident from the above and the Illustrative Masterplan, the design-led approach has had regard to the aspirations for regeneration set out in the SLP and STC Masterplan. It optimises the Site's capacity to provide development which is appropriate within its existing and emerging context in accordance with LP Policies D1-3 and SLP Policies 28 and 29.

Height and Massing (inclusive of Tall Buildings Assessment)

		<p>LP Policy D9 identifies a specific set of impacts and considerations that should inform the placement, height and massing of tall buildings. It is clear that what constitutes a “tall” building will vary depending on the locality but in any event would not be less than 6 storeys (or 18 metres) in height. The provision for such should be informed by a plan-led and design-led approach, be of the highest standard of architecture and materials; and, contribute to improved legibility and permeability. It is expected that tall buildings will be designed to ensure they do not have an unacceptably harmful impact on the surrounding context in terms of visual, functional, environmental impacts, including wind, overshadowing, glare, strategic and local views as well as heritage assets. These should then be considered cumulatively to demonstrate they are appropriate and acceptable overall.</p> <p>For plan-making purposes, LP Policy D9 outlines that a taller building is defined as not being less than 6 storeys. The SLP defines ‘tall’ buildings as those that are “significantly taller than the mean height of surrounding development and will have a range of 7 to 10 storeys (21m to 30m)” and ‘very tall’ buildings as those that are “excessively taller than the surrounding built form and will be from 11 storeys upwards”.</p> <p>The SLP Policies Map (2018) and specifically Map 7.1 appended to the SLP designates ‘Areas of Taller Building Potential’ in directing where such development should go. With regard to these areas, SLP Policy 28 provides key criteria that taller buildings will need to meet in order to be considered acceptable. This aligns with LP Policy D9 in needing to be appropriately located, to include Sutton Town Centre and the identified ‘Areas of Taller Building Potential’; be of a height, form, massing and footprint proportionate to its location and sensitive to adjacent buildings; be of exemplar design; positively contribute to and integrate with the townscape and streetscape; not have adverse impact on any designated heritage assets and the overall historic character of an area; ensure safe, attractive and comfortable amenity / open spaces; and protect the amenity of neighbours and surrounding occupiers.</p> <p>As per the Illustrative Masterplan, the development is anticipated to deliver buildings ranging in heights from 4 to 16 storeys and therefore technically comprises “tall” and “taller” buildings in accordance with the LP D9 and SLP definitions. The Maximum Height Parameters have been established on this basis, as can be seen from Parameter Plan 2. The Proposed Development therefore triggers the requirements of LP Policy D9 and SLP Policy 28.</p> <p>In terms of addressing the first of the policy requirements, the Site is located within an ‘Area of Taller Building Potential’ within Sutton Town Centre and therefore in accordance with LP Policy D9 and SLP Policy 28 considered suitable for tall buildings. The Area of Taller Building Potential designation identifies heights of 7 to 10 storeys for the Site. The indicative height parameters of STC45 also identify the Site’s frontage onto Throwley Way as a location for “taller elements” and the STC Masterplan indicates this as being for up to 10 storeys. The principle of tall and taller buildings on the Site is therefore considered acceptable in accordance with LP Policy D9 and SLP Policy 28, subject to demonstrating compliance with the remaining criteria. These are considered further and should be read in conjunction with the submitted technical reports which provide detailed assessment of each of the relevant impacts and considerations listed under both policies. This includes: Heritage; Town and Visual Impact; Daylight, Sunlight and Overshadowing; Wind and Microclimate; Noise; Air Quality; Fire; Servicing; Transport; Design and Access Statement; and the Design Code.</p> <p>In keeping with the indicative parameters of STC45 and the STC Masterplan, the proposals focus the taller elements on Throwley Way. They are located at focal points of existing key east-west movement corridors which will be enhanced as a result of the Proposed Development to contribute to legibility and permeability through and beyond the Site, as sought by the STC Masterplan. The primary marker building (and proposed maximum height) is located at the junction with Benhill Avenue, located centrally along the Site’s Throwley Way Frontage, marking the proposed extension of the existing east-west movement corridor via the diagonal route through the Site to the High Street. The secondary marker building, sits at the northern end of the Site and Throwley Way frontage at the junction with Marshall’s Road. It provides a determining feature as part of the gradual height transition upwards evident within the existing and emerging height context for the Northern Gateway part of the Town Centre. It also marks a secondary east-west passage through the Site from Throwley Way to the High Street, promoting further legibility.</p> <p>In terms of the specific height parameters, early capacity testing was undertaken on the basis of the indicative parameters set out in STC45 and as illustrated further through the STC Masterplan. Noting, in particular, that STC45 considers a net uplift of 47 residential units plus potential for a small quantum of non-residential</p>
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	<p>floorspace only and therefore a limited extent of development. Against the current national, regional, and local planning policy backdrop this does not represent optimisation of the Site's potential.</p> <p>The supporting text (at paragraph 4.3) of SLP Policy 40 is clear that the "...allocations broadly prescribe the development that will be permitted on each site and highlight some site-specific considerations. This information is not comprehensive and all site allocations will be expected to comply with the policies within the Development Plan (ie: the London Plan and the Local Plan)" (paragraph 4.3). It goes onto explain that "the capacity stated for each site is merely a guide. It does not follow that a planning application will be granted if the application contains the stated amount of housing units. Equally, through the submission and approval of a planning application, it may be possible to achieve a suitable development which exceeds the guideline capacity."</p> <p>The quantum and quality of development that could come forward on the basis of a scheme that is wholly compliant with the indicative STC45 parameters was presented to LBS LPA during the pre-application process. This demonstrated the limitations of a development that strictly accords with STC45 in townscape and place-making terms as well as the resulting significant viability constraints which undermine the deliverability of STC45 as it stands. This exercise confirmed the need for greater height in order to deliver a viable capacity of development and which could satisfy the wider objectives of STC45. This is as per the position for a number of town centre allocations and which now benefit from planning permissions which exceed the indicative parameters set out in their respective allocations (as detailed further at paragraph 6.122 below).</p> <p>The two marker elements therefore do comprise maximum heights that exceed the indicative parameters for the Site (eg. of up to 10 storeys). However, these two exceedances are limited to two locations on Throwley Way which otherwise aligns with where taller elements are considered appropriate, as set out in STC45 and the STC Masterplan. In turn, the remainder of the Proposed Development and Maximum Height Parameters nonetheless sit between 4 and 6 storeys and therefore fully accord with the indicative height parameters identified for the rest of the Site. When read against the allocation and the Development Plan as a whole, in taking a design-led approach to development in accordance with LP Policies GG2 and D3, it is considered that there is planning reason and policy grounds for additional height on the Site, over and above the indicative (only) parameters identified, up to a maximum of 16 storeys.</p> <p>This is underpinned by high quality design, as secured through the submitted Design Code and townscape and place-making justification which is detailed further below (and within the submitted HTVIA), alongside a suite of wider planning and public benefits as set out in Section 7. Hence complying with and justifying the presence of these taller buildings within Sutton Town Centre as per the requirements of SLP Policy 3 and parts of (i) and (ii) of SLP Policy 28.</p> <p>In line with the above, there is a clear indication of capacity for a new context of tall buildings within the Town Centre and increased height levels at this important and prominent location within the 'Northern Gateway'. The proposed tall building approach acknowledges and responds to the Site's existing, emerging and future context as is evident through recent consents, SLP Site Allocations and the STC Masterplan.</p> <p>In terms of existing and emerging context, there are a number of recent consents within the Town Centre which comprise taller buildings, and more notably of heights which exceed the indicative height parameters of their respective Site Allocations contained within the SLP. This includes:</p> <ul style="list-style-type: none"> I. St Nicholas House – at 18 storeys, this comprises an additional 8 storeys over and above the indicative height parameters set out under STC29. II. Beech Tree Place – at 8 storeys, this comprises an additional 2 storeys over and above the indicative height parameters set out under STC11. III. Times Square – at 20 storeys, this comprises an additional 10 storeys over and above the indicative height parameters set out under SCT41.
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IV. The Old Gas Works Site – at 13 storeys, this comprises an additional 3 storeys over and above the indicative height parameters set out under STC1.

V. B&Q (Chalk Gardens) – at 21 storeys, this comprises an additional 10 storeys over and above the indicative height parameters set out in STC36

There is therefore clear evidence already of how the current planning policy context is informing the development proposals that come forward in Sutton Town Centre, in facilitating the effective use of land and the delivery of wider place-making benefits. The two proposed exceedances of 3 and 6 storeys, respectively, over and above the indicative parameters for the Site sit comfortably within what has been justified and permitted elsewhere in forming a new townscape context. For the Site, The Old Gas Works Site in particular provides that existing tall buildings backdrop beyond the High Street and marking the northern end of the 'Northern Gateway' part of the town centre.

In terms of potential future context, Site Allocation STC25, located immediately to the north of the Site on the other side of Marshall's Road is subject to indicative height parameters of up to 10 storeys. Site Allocation STC24 located to the north-west, south of The Old Gas Work Site, is subject to indicative height parameters of up to 12 storeys. Whilst it is recognised that LBS LPA Officers are not aware of any emerging proposals for these sites to be delivered in the immediate future, the indicative height parameters establish the principle of tall and taller buildings in these locations and demonstrate that these are considered to be appropriate and acceptable in policy terms subject to the detail that comes forward. It therefore does provide a relevant height context of the Site. Furthermore, existing buildings immediately to the west fronting Marshall's Road and continuing onto the High Street have been earmarked for redevelopment comprising tall buildings. Whilst these proposals are still emerging, it has been acknowledged by LBS LPA and Design South East that there is opportunity for a marker building at the northern end of the pedestrian High Street. This is keeping with the aspirations of the STC Masterplan which similarly identifies the potential for stepping up to taller elements along Marshall's Road which sits within the wider 7-10 storey 'Area of Taller Building Potential' designation alongside the Estate.

Visually, and beyond the marker elements, the distribution of height and massing deliberately seeks to ensure built form steps down in height as the blocks extend into the Site, through to Elm Grove and beyond to meet the High Street. These lower levels of massing step down towards the existing high street context to promote Elm Grove as a residential street with mid-rise blocks. This gradual transition reduces the overall appearance of scale and massing so that it respects and relates well to the existing three and four storey context of the High Street. This ensures it appears domestic in scale, fitting in with the overall form and layout of the Site's surroundings consistent with the indicative 2 to 6 storey height range set out under STC45.

The illustrative details demonstrate how exemplar design quality can be achieved on the Site and at outline stage, this is being secured through the principles contained within the Design Code. The quality of design will also help to raise the standard of design more generally in Sutton Town Centre and the 'Northern Gateway' area. Similar to other important permissions for tall buildings within the Town Centre (such as St Nicholas House, Times Square and B&Q), the proposals are supported by a comprehensive HTVIA, inclusive of a Tall Building Assessment, in support of the Maximum Height Parameters of the OPA. This includes detailed, illustrative designs which demonstrate success in place-making terms and provide justification for the presence of such heights in the identified landmark locations, satisfying parts (i) and (ii) of SLP Policy 28.

The submitted HTVIA has assessed the visual impact of the Proposed Development within 17 views (to include long-range, medium-range and immediate in accordance with LP Policy D9) and considered it in the context of immediate sensitivities, to include heritage assets satisfying part (v) of SLP Policy 28, as well as the wider townscape. The assessment concludes that the scheme has been sensitively designed and the massing responds appropriately to both the immediate and the wider context of the Site. The taller buildings are regarded to be carefully configured along the eastern edge of the Site and therefore effectively mark the key connection routes from Throwley Way and Benhill Avenue through to Sutton High Street.

The HTVIA identifies that the Proposed Development, together with the surrounding developments, provides the opportunity to make a distinct improvement to the current condition in long-range, medium-range and short-range views and within the surrounding townscape context. In relation to the two marker buildings in particular,

	<p>the visual impact assessment demonstrates that they will make a positive contribution through improved legibility and wayfinding across the townscape. Thereby, contributing to the enhancement of this townscape and visual amenity within Sutton Town Centre.</p> <p>In accordance with LP Policy D9, the Proposed Development is therefore not considered to result in any adverse visual impacts and instead will “reinforce the spatial hierarchy of the local and wider context and aid legibility and wayfinding”. This similarly satisfies the requirements of SLP Policy 28.</p> <p>In terms of functional impact, an Outline Fire Safety Statement has been submitted as part of the OPA. This demonstrates that the buildings have been designed to ensure the safety of all occupants. The submitted Design and Access Statement provides details on accessibility, servicing and management of the buildings. It also sets out the principles of Secured by Design that have been considered and agreed in principle through consultation with the Metropolitan Police Designing out Crime Officer.</p> <p>The submitted Transport Assessment confirms that there will be no impact on the transport network and that there is capacity within it to accommodate the proposed quantum of development, with movement via sustainable modes of travel to only be improved as a result of the Proposed Development. Section 7 of this Statement provides a summary of the wider planning and socio-economic benefits that will be generated as a result of the regeneration of the Estate.</p> <p>In accordance with LP Policy D9 and SLP Policy 28, the Proposed Development is therefore not considered to result in any adverse functional impacts and instead will provide a safe new residential environment which will positively “...contribute to a socially balanced and inclusive community”, satisfying part (iii) of SLP Policy 28, in particular.</p> <p>With respect to environmental impact, the OPA comprises a Wind and Microclimate Assessment, Daylight, Sunlight and Overshadowing Assessment, Noise Assessment and Air Quality Assessment. These submitted technical reports demonstrate how the respective environmental considerations have informed the design of the Proposed Development and sought to minimise the potential for any adverse impacts. Where the potential for such has been identified, appropriate mitigation measures have been proposed and the Illustrative Masterplan shows how these can be planned into the Proposed Development. As such, in accordance with LP Policy D9, the tall buildings will not “...compromise comfort and the enjoyment of open spaces” or “...adversely affect street-level conditions”. This similarly satisfies the requirements of SLP Policy 28, parts (iv) and (vi), in particular.</p> <p>When considered cumulatively, it is clear from the relevant submitted technical assessments that the Proposed Development does not give rise to any adverse visual, functional or environmental impacts. It is therefore considered to conform with LP Policy D9 and SLP Policy 28 and be of an appropriate height and massing.</p> <p><u>Daylight, Sunlight and Overshadowing</u></p> <p>Detailed assessment points are identified in the OPA’s Planning Statement and Daylight / Sunlight Assessment.</p> <p>Given the Proposed Development seeks to optimise the Site’s potential in supporting future housing delivery and in particular the regeneration of the existing Estate, a degree of change for the surrounding built environment is inevitable. However, the approach to height and massing alongside the configuration of built form has been informed by thorough daylight, sunlight and overshadowing analysis during the pre-application stage and a result of detailed consultation with both LBS LPA Officers, Design South East and the GLA. It therefore seeks to minimise the potential for adverse effects to ensure that the residual impacts and the retained levels for neighbouring properties are considered to be acceptable for an urban location. This is evident through the Maximum Height and Development Plot Parameters for the development which, as established by Parameter Plans 1 and 2, are considered to demonstrate a positive design response to the nearest residential receptors.</p> <p>The proposed form and massing of the building is appropriately set back from the neighbouring properties to the North and West. The relationship between the proposed development and the residential windows of these adjacent residential units has been carefully considered and internal floorplan layouts as well as orientation to ensure there would not be an unacceptable impact. In this respect, the taller elements are concentrated along Throwley Way along the eastern boundary of the Site and step down in massing towards the northern and western edges of the Site.</p>
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Neighbouring Residential Amenity

Detailed assessment points are identified in the OPA's Daylight / Sunlight Assessment submitted.

On the basis of the submitted Daylight, Sunlight and Overshadowing Assessment as summarised above, the Proposed Development is not considered to result in any unacceptable harm on neighbouring properties and will maintain a satisfactory level of residential amenity in-keeping with its urban setting. It is also reflective of a changing context through the regeneration of the Estate to make efficient use of the land and provide replacement as well as new housing. A marginal difference evident between the assessments of the Maximum Parameters and the Illustrative Masterplan, reflective of the articulation and refinement of the built form of the latter. This demonstrates that the detailed design that comes forward through future Reserved Matters Applications can be expected to perform well compared to the Maximum Parameters. The Proposed Development is therefore considered consistent with BRE guidance and wholly in accordance with NPPF 129 c), LP Policy D6, the Mayor's Housing SPG and SLP Policy 29.

Proposed Residential Amenity

Detailed assessment points are identified in the OPA's Daylight / Sunlight Assessment submitted.

On the basis of the above and the submitted Daylight, Sunlight and Overshadowing Assessment, the Proposed Development will provide sufficient daylight and sunlight for future residents and through careful design will minimise the impacts of overshadowing so that the usability of external amenity and public open spaces can be maximised at the most appropriate times of the year. It is therefore regarded to be wholly in accordance with NPPF 129 c), LP Policy D6, the Mayor's Housing SPG and SLP Policy 29.

Inclusive Design

Detailed assessment points are identified in the OPA's Planning Statement, Inclusive Design Strategy and Illustrative Masterplan.

The inclusive design strategy for the Proposed Development is threaded throughout the submitted Design and Access Statement, in accordance with LP Policy D5. This is supported by the design principles that underpin the regeneration of the Estate as a whole and will be expected to be applied through future RMAs, as secured through the Design Code. The Illustrative Masterplan demonstrates one way in which the inclusive design principles could be incorporated on this basis and it is evident from this that they are central to the Proposed Development, extending to all parts of the public realm and built form. This ensures independent and easy horizontal and vertical movement into and through buildings; out onto private and communal (private) amenity spaces; to car parking provision; and, across public open spaces and public realm.

On the basis of the above, and as demonstrated through the Illustrative Masterplan, the design principles are underpinned by an inclusive design rationale and will therefore ensure that the Proposed Development is well integrated and accessible for all. This is wholly compliant with LP Policy D5, SLP Policy 28.

Private Amenity and Playspace

Detailed assessment points are identified in the OPA's Planning Statement, Design and Access Statement, illustrative Landscape Strategy and illustrative Masterplan.

In summary, the proposed provision and strategy for private external amenity space, communal (private) external amenity space and play space as part of the Proposed Development is considered to meet the needs of returning and new residents. In accordance with LP Policies D6 and S4, the Mayor's Play and Informal

Recreation SPG, SLP Policy 9, it will be of good quality; stimulating through the incorporation of a range of hard and soft landscaping, play and recreational features; and, located so that it benefits from passive surveillance. It will therefore be safe, meaningful and useable. All spaces will be accessible, underpinned by the inclusive design principles, and of an equivalent standard across the Estate to ensure no differentiation between tenures. It is therefore considered to represent a substantial improvement on the existing provision.

Public Open Space and Landscaping

Detailed assessment points are identified in the OPA's Planning Statement, Design Code, Design and Access Statement and Landscape Strategy.

Overall, the public realm improvements proposed throughout the Site, as well as the creation of new areas of public open space and incorporation of extensive new landscaping will deliver a substantial improvement in both qualitative and quantitative terms when compared to the existing provision on the Site. The Proposed Development introduces clearly defined, usable and attractive, publicly accessible green spaces and features where there is currently a notable deficiency and therefore is considered to address the requirements of NPPF 96, NPPF 102, LP Policies D8, G1, G4 and G5 and SLP Policies 3, 25, 28 and 33.

Trees

Detailed assessment points are identified in the OPA's Planning Statement and Arboricultural Survey (which includes a tree survey).

The Site is not considered to contain any high quality Category A tree cover but does comprise species which are of moderate to low quality. The loss of tree cover within the Site is necessary and inevitable in order to facilitate the regeneration of the Estate and make efficient use of the land. This has been accepted and acknowledged by LBS LPA and GLA Officers as part of the pre-application consultation process.

The detailed design development that takes place in support of future RMAs will determine the exact number and location of features for removal and retention. The Illustrative Masterplan and submitted Illustrative Landscaping Strategy demonstrate the extent of tree removal that would be required based on one way in which the outline parameters could be applied. The Illustrative Landscape Strategy includes the provision of 77no. new trees to be incorporated into the Site; 49no. trees that are to be planted at ground level will be large to medium sized trees, and 28no. trees that are to be planted at podium or roof level will be small to medium sized trees. This represents 3.5no. new trees for each tree to be removed and an uplift of 55no. trees compared to the existing.

As is evident from the above, the Illustrative Landscaping Strategy comprises a comprehensive approach to new and replacement tree planting strategy to ensure a net gain in the number of features on the Site. The selection of trees and planting has been specifically derived to ensure short-term and longer-term presence and on the basis of function and usage within specific locations across the Estate. This will ensure an appropriate diversity of arboriculture features which will not only contribute to the greening of this urban site but also assist in the permeability and legibility of the Proposed Development, as elements of visual and physical interest and, through canopy cover, allow for shading / cooling in the summer. It also provides further softening of the urban environment as well as an additional means of absorbing carbon dioxide, contributing to the wider sustainability and environmental objectives of the Proposed Development.

On balance, it is therefore considered that the proposed tree retention, removal and replacement strategy for the Site as part of the wider Illustrative Landscaping Strategy is policy compliant having regard to NPPF 136, LP Policy G7 and SLP Policy 28.

Ecology

Detailed assessment points are identified in the OPA's Planning Statement and PEA (accompanied by a BNG Assessment).

		<p>In line with the recommendations of the PEA, mitigation and enhancement measures have been incorporated into the Proposed Development as part of the Illustrative Landscape Strategy. This includes a bat sensitive lighting strategy; additional landscaping to include new trees and wildlife-friendly species; and, bird and bat boxes to be integrated into the new built form. Appropriate measures have also been identified for the demolition and construction stages and the emergence survey will determine whether anything else is required ahead of demolition taking place on the Site.</p> <p><u>Biodiversity</u></p> <p>Detailed assessment points are identified in the OPA's Planning Statement and PEA (accompanied by a BNG Assessment).</p> <p>On the basis of the outline parameters and design principles, the Illustrative Masterplan demonstrates how the Proposed Development can achieve significant biodiversity net gain; and positively contribute to addressing existing deficiencies in access to nature and green infrastructure. It is therefore considered to be wholly compliant in planning policy terms having regard to NPPF 8, 180 and 185; LP Policy G6; and SLP Policy 26.</p> <p><u>Planning Balance</u></p> <p>Given, the SLP is now beyond five years old and we know that the Council is currently in the process of a Local Plan review, it is questionable whether the adopted Plan can still be considered "up-to-date." As part of this review, we understand a Tall Building Study has now been prepared (to form part of the imminent R18 plan consultation). It is expected that this document will take account of the emerging townscape context of the Town Centre to support the optimisation of existing (and new) site allocations, to include the Elm Grove site.</p> <p>It is also arguable that the Proposed Development is not a technical departure given paragraph 4.3 of the SLP which allows for site allocation parameters to be exceeded on the basis of justification. Therefore with that technical and policy justification bedded into the Proposals, the application is considered to be compliant with the Development Plan when read as a whole.</p> <p>However, notwithstanding the above, in response to LBS LPA Officers' formal comments through the pre-application process, the Applicant has given full regard to NPPF 12 in the context of the proposed, new heights which exceed the indicative (only) height parameters (STC 45) at localised parts of Illustrative Masterplan (the majority of new heights proposed across the Estate sit within the indicative STC parameter heights). This planning, design, townscape and heritage justification to support these localised, taller elements (as comprehensively set out within the OPA) weighs-in (as part of the Planning Balance) alongside the substantial planning and public benefits generated from the Proposed Development which would not otherwise come forward in a "no scheme world."</p>
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Heritage, Townscape and Visual	LP Policies D9 and HC1 SLP Policies 28 and 30	<p>LP Policy HC1 considers heritage conservation and growth by setting out that development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings is expected to be actively managed. It states that "development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process".</p> <p>At a local level, SLP Policy 30 sets out the Council's intention to conserve, and where practical, enhance the borough's historic environment. As the Site is in an Archaeological Priority Area, the policy requires appropriate investigation and production of an archaeological evaluation.</p> <p>In regards to "tall" buildings and the wider townscape, to include the historic environment, as discussed in part earlier in this section, LP Policy D9 requires such development proposals to take account of the visual impact and avoid harm to the significance of heritage assets and their settings. Tall buildings will be expected to positively contribute to the character of the area and proposals that may result in harm will require clear and convincing justification consistent with NPPF 206.</p> <p>There are no statutory or locally listed /scheduled assets on the Estate. 216-220 High Street is located within Sutton Town Centre Conservation Area. The closest scheduled monument is the 'Milestone in Sutton High Street' which is located approximately 50 metres to the south west of the Site boundary.</p> <p>In recognising the nearby heritage assets and their settings, as well as the potential for the Site to comprise technically "tall" buildings, the design-led approach to the regeneration of the Estate seeks to avoid undue harm and positively contribute to the enhancement of the wider townscape, to include the historic context. This has been applied to the Proposed Development as a whole and thereby on a Site-wide basis, as is evident from the submitted Illustrative Masterplan.</p> <p>A HTVIA has been undertaken and informed the evolution of the Proposed Development. This has been submitted as part of the OPA and should be read in conjunction with the below, as only a summary of the relevant considerations.</p> <p>The HTVIA confirms that the existing Estate makes either no or a negative contribution towards the significance of the identified heritage assets. The upper elevations of the principle façade of 216-220 High Street and the building's overall scale and architectural appearance are considered to make a positive contribution to the significance of the Conservation Area and also contribute to the setting of a number of the locally listed buildings within close vicinity. The redevelopment of the Estate and retention of 216-220 High Street is therefore not considered to give rise to the potential for harm and instead provides an opportunity to continue to contribute to and enhance the existing settings through the addition of higher quality public realm and architecture.</p> <p>The wider townscape character is varied with a mix of uses, heights and architectural styles, eras and materials. The existing Estate is not considered to relate well to its surrounding urban fabric. It lacks an active frontage along Throwley Way and fails to integrate with its surroundings, creating a visual gap and isolated presence which obstructs the continuation of adjacent urban grain. It is therefore considered that there is ample scope for improvement through the regeneration of the Estate.</p> <p>On the basis of the above, careful consideration has been given to massing of the Proposed Development and the spatial arrangement of built form alongside key design elements to include, but not limited to, areas of public realm, landscaping, public open space and movement routes, as can be seen from the Illustrative Masterplan. This has been considered in the context of the immediate setting and local plus strategic views as agreed with LBS LPA Officers during the pre-application consultation process.</p> <p>The views' analysis contained within the submitted HTVIA demonstrates that the massing of the Proposed Development scheme responds to both the immediate and the wider context of the Site. This is through the placement of lower heights along Elm Grove responding to the established neighbouring heights of high-street properties to the west. This has resulted in limited visibility of the Proposed Development from the wider townscape setting around the Site (based on both the medium-range and long-range views).</p>
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		<p>The proposed taller elements are concentrated along the eastern part of the Site located at key junctions and to reflect and reinforce the emerging 'Northern Gateway' as part of the town centre. As can be seen from the views enclosed within the submitted HTVIA determines that the proposed tall buildings will make a positive contribution in the townscape in terms of the role they will play in improving the legibility and wayfinding across the townscape. When considered holistically, and subject to a high-quality design for the Site coming forward as part of a future Reserved Matters Application, it has been assessed that the proposed development will result in a distinct improvement to the current condition in close range views through increased containment along Throwley Way and Elm Grove as well as through the creation of a new diagonal link between the Throwley Way and Elm Grove, which the primary marker building serves to demarcate.</p> <p>The cumulative views assessed have demonstrated that the height and mass of the Proposed Development is in-keeping with the prevailing form of the emerging context of Sutton and that cumulatively the Proposed Development would contribute positively to the existing and emerging skyline and townscape of Sutton.</p> <p>The HTVIA therefore concludes that in all the views assessed, the Proposed Development has been found to have no adverse impact on visual amenity. Based on the Illustrative Masterplan, and subject to the detailed design that comes forward, it will result in a distinct improvement to the current condition in long-range, medium-range and short-range views, and within the surrounding townscape context and setting of identified heritage assets.</p> <p>Drawing down to the immediate sensitivities in terms of the Sutton Town Centre Conservation Area to the west, particular consideration has been given to the potential heritage impacts arising from the Proposed Development. The submitted Illustrative Elevations for the Plot C show how, through block articulation and elevational treatment, new built form will carefully respond to the character and appearance of the Conservation Area. Due to the limited visibility and articulated massing, the Illustrative Masterplan massing for Plot C would cause no harm to the significance of the Conservation Area, and this was confirmed by LBS LPA Officers during the pre-application process.</p> <p>In term of the maximum parameters, due to the potential for greater mass and extent allowed for at this outline stage, there is potential for a very low level of "less than substantial" harm to arise on the visual effects of the Conservation Area should a rear extension be proposed which maximises the full extents of the building footprint and heights in accordance with the Parameter Plans. However, to mitigate this and to inform the detailed design that comes forward at Reserved Matters stage, the Design Code provides guiding principles for the articulation and material / elevational treatment of any future extension to 216-220 High Street. This is expected to ensure that the proposed massing reads as a subservient rear extension to the buildings along the High Street and therefore reduce the visual effect to a negligible or no level of harm. Notwithstanding this, the planning and public benefits of the Proposed Development, as set out in Section 7, would significantly outweigh any potential harm (as noted to be on the very low level of "less than substantial") in accordance with NPPF 208.</p> <p>Overall, the Proposed Development is therefore considered to not cause harm to any of the identified heritage assets, having regard to their significance, and in fact provides an opportunity to enhance the settings of the Conservation Area and two locally listed buildings so as to positively contribute to the local character and distinctiveness in accordance with NPPF 203. The proposed built form, materiality, integrated movement routes and public realm / open space and landscaping together, as shown through the Illustrative Masterplan, will have a positive effect on the townscape character.</p> <p>The HTVIA provides a thorough analysis of the Site and study area, and its context in relation to built heritage assets, townscape character and visual amenity and views. This has enabled a robust impact assessment of the Proposed Development to be undertaken for each of these related disciplines and demonstrate compliance with NPPF 195-209, LP Policies D9 and HC1 and SLP Policies 28 and 30.</p>
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Archaeology	LP Policy HC1 SLP Policy 30	<p>LP Policy HC1 expects “development proposals to identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation. Where applicable, development should make provision for the protection of significant archaeological assets and landscapes”.</p> <p>At a local level, SLP Policy 30 states that the Council will conserve and, where practicable, enhance the borough's historic environment. This includes: Conservation Areas, Historic Parks and Gardens, Locally Listed Buildings and undesignated archaeological remains.</p> <p>In accordance with national, regional and local planning policy, an Archaeological Desk-Based Assessment has therefore been prepared and submitted as part of the OPA. This confirms that the Site has high potential for Post-Medieval remains, likely to be of local significance and moderate potential for Medieval remains, likely to be of regional significance depending on the nature of the remains. The potential for remains of other periods within the Site is considered to be low. Much of the Site's archaeological potential is noted to have been affected by Post-Medieval and Modern development. Localised remains, if present, are likely to be located below the hardstanding surface and building formation level and cutting down through any made ground / natural geology. Works to grade level including demolition of existing buildings as part of Phase 0 enabling works, or Site-wide demolition, would have no impact on archaeological remains.</p> <p>Any below ground works which involve breaking the existing formation level have the potential to affect archaeological remains. This could be mitigated through an agreed programme of archaeological works as part of a planning condition prior to these specific works taking place.</p> <p>In light of the above, archaeological considerations are not considered to preclude the proposed development of the Site, in accordance with LP Policy HC1 and SLP Policy 30.</p>
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Transport	<p>LP Policies T1, T2, T4, T5, T6 and T7 SLP Policies 36 and 37 SLP Allocation STC45</p>	<p>LP Policy T1 sets out the strategic approach to transport for London and, in line with encouraging the efficient use of land, expects development to respond appropriately to existing and future public transport connectivity and accessibility and mitigate against any adverse impacts on the transport network. LP Policy T2 requires development proposals to "...deliver patterns of land use with facilitate residents making shorter, regular trips by walking or cycling" and reference is made to the application of the Mayor's Healthy Streets approach in achieving this. As such, development proposals should reduce the dominance of vehicles and be permeable by foot and cycle in connection with the wider public transport network.</p> <p>LP Policy T4 reinforces the importance of assessing and mitigating transport impacts through development proposals and requires transport assessments / statements to be submitted as part of planning applications to ensure the impacts on the capacity of the transport network is fully assessed. Where necessary to address adverse transport impacts, mitigation should be identified either through on-site provision in the form of public transport, walking and cycling facilities and highways improvements or through financial contributions. It is clear that "development proposals should not increase road danger".</p> <p>In line with the above, the LP establishes minimum cycle parking standards under LP Policy T5, which should be applied to development proposals to encourage such sustainable modes of travel and remove barriers to access. In turn, LP Policy T6 establishes maximum car parking standards and is clear that "car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport...". This is with the exception of adequately providing for disabled person parking.</p> <p>LP Policies T6.1 to T6.5 then set out the relevant parking standards that should be applied to development proposals on a use class basis, to include appropriate provision for disabled persons and infrastructure to support electric vehicle charging.</p> <p>At a local level, SLP Policy 36 states that the Council will assess all new development applications for their impact on the existing and proposed transport infrastructure and services, and the local environment. SLP Policy 37 sets out support for developments which have limited or no car parking within town centres, new development must provide cycle parking and a proportion of parking should be dedicated as disabled parking spaces. Site Allocation STC45 identifies the importance of development coming forward on the Site which retains and enhances the connection between the High Street and Throwley Way.</p> <p>In respect of deliveries and servicing specifically, LP Policy T7 states that development proposals should make adequate provision for servicing, storage and deliveries off-street, with on-street loading bays only used where this is not possible. This is in the interest of ensuring a safe, clean and efficient process with Construction Logistics Plans and Delivery and Servicing Plans expected to be prepared to demonstrate how this will be achieved in accordance with TfL guidance. SLP Policy 36 similarly reiterates the need for such to be adequately addressed through development proposals.</p> <p>The transport strategy for the Proposed Development has been designed on an Estate-wide basis in order to ensure the delivery of a cohesive movement network which maximises connections and accessibility both within the Site and in integrating into the existing network of the surrounding area. It is important therefore to consider the transport, access, parking and deliveries / servicing considerations of the Proposed Development as a whole in order to fully understand any potential impacts and appreciate how it will function and form part of the local and strategic transport network. As is summarised below and within the submitted Transport Assessment, the regeneration of the Estate provides an opportunity to positively contribute to the promotion of sustainable travel within Sutton Town Centre.</p> <p>Parameter Plan 3 defines the means of access into the Site as well as a framework of movement routes into and through the Estate across the various travel modes which underpin the Illustrative Masterplan.</p> <p>Further details on the transport, access, parking and movement strategies for the Site are set out within the submitted documents prepared by Markides Associates as the project transport consultant and should be referred to in full, with the below providing a summary only. This includes a Transport Assessment ("TA") comprising an Active Travel Zone Assessment ("ATZA"), Framework Travel Plan ("FTP") Outline Construction Logistics Plan ("OCLP") and Outline Delivery and Servicing Plan ("ODSP"). An ATZA has been undertaken to support the OPA in accordance with the latest TfL guidance as a means of identifying how people of all abilities can make key journeys that are essential to support car-free lifestyles. This forms part of the submitted TA and provides details on pedestrian and cycle</p>
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movement routes connecting the Site and identifies possible improvements to enhance public transport connectivity commensurate with the Proposed Development impact itself and in compliance with Regulation 122 of CIL Regulations 2010 (as amended).

Access

Detailed assessment points are identified in the OPA's Planning Statement, Transport Assessment, Parameter Plan 3 and Illustrative Masterplan.

The Proposed Development is considered to provide a comprehensive movement network which has been designed to adequately serve the needs of returning and future residents as well as provide wider accessibility benefits for the local community. It will encourage and facilitate regular travel via bicycle and foot and improve the connectivity of an existing sustainable location. It is therefore considered to be wholly compliant in planning policy terms having regard to NPPF 109 - 112; LP Policies T1 and T2; and SLP Policies 36 and 37 and STC45.

Trip Generation

Detailed assessment points are identified in the OPA's Planning Statement and Transport Assessment.

The Proposed Development will not result in any adverse impacts on the local or strategic transport network and will not result in an increase in road danger. As such, it is considered to be wholly acceptable in transport terms, in accordance with NPPF 110 and 114; LP Policies T1 and T4 and SLP Policy 36.

Car parking

Detailed assessment points are identified in the OPA's Planning Statement and Transport Assessment.

On balance, in light of the Site's PTAL 6a and the overriding commitment to returning residents, with the development otherwise designed to be car-free, this level of provision has been agreed to be acceptable in principle with both TfL and LBS LPA Highways Officers during the pre-application consultation process. In turn, the trip generation assessment demonstrates that this level of car parking within the Site will not have an adverse impact on the local or strategic highway network and is anticipated to positively contribute to the reduction in car ownership levels within Sutton Town Centre as a result of improved accessibility to public transport and sustainable travel modes. The Proposed Development is therefore considered to be acceptable in transport terms and conform with NPPF 108 -117; LP Policies T1, T4 and T6-6.5; and SLP Policy 36.

Cycle parking

Detailed assessment points are identified in the OPA's Planning Statement and Transport Assessment.

The number of cycle parking spaces will be subject to the final Unit Mix on a phase by phase / plot by plot basis and in accordance with the Indicative Unit Range Mix (%). It will therefore be determined and confirmed through future RMAs.

Resident long-stay cycle parking will be provided in secure stores located at the ground and first floors of residential blocks with short-stay provision for visitors distributed within the public realm, to include around the East-West link. These have been designed and laid out in accordance with the guidance contained in the London Cycling Design Standards and therefore both the quantity and quality of provision is considered to fully comply with LP Policy T5 and SLP Policy 36.

Refuse and servicing

		<p>Detailed assessment points are identified in the OPA's Planning Statement and Transport Assessment.</p> <p>The development will facilitate safe, clean and efficient delivery and servicing operations, primarily off-street and has been designed to ensure adequate space and storage for associated arrangement in line with the anticipated needs of returning and future residents. It is therefore considered to conform with the requirements of LP Policy T7 and SLP Policy 36.</p> <p><u>Construction and traffic</u></p> <p>A OCLP has been prepared in support of the OPA and sets outs how the delivery of the Proposed Development will be managed to minimise the impacts of construction on the surrounding highway network, to include the pedestrian and cycling environment. In particular, this provides details on Phase 0 Enabling Preliminary Works to facilitate these works taking place upfront and early in the demolition and construction programme.</p> <p>A detailed CLP will be produced for the remainder of the Site and subsequent phases, as the detailed design progresses and will be secured through an appropriately worded planning condition. However, for the purposes of demonstrating the intended approach to ensure there are no adverse impacts as a result of the Proposed Development, the submitted OCLP is considered to address the requirements of LP Policy T7 and TfL Construction Logistics Plan Guidance (2017).</p>
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Energy and Sustainability	<p>LP Policies GG6, SI 2, SI 4, SI 7 and D6 SLP Policy 31 SLP Allocation STC45</p>	<p>In line with the above, LP Policy GG6 “seeks to improve energy efficiency and support the move towards a low carbon circular economy, contributing towards London becoming a zero carbon city by 2050”. LP Policy SI 2 states that “major development should be net zero-carbon” and in achieving this should reduce greenhouse gas emissions in both operation and demand in line with the energy hierarchy set out the policy. This comprises four individual but interrelated strands which include “be lean”, “be clean”, “be green” and “be seen”. Planning applications for major development proposals are required to include a detailed energy strategy to demonstrate how the zero-carbon target will be met in accordance with these.</p> <p>LP Policy SI 2 goes on to state “a minimum on-site reduction of at least 35 per cent beyond Building Regulations is required for major development...” and residential development should achieve 10 per cent through energy efficiency measures. Where zero-carbon cannot be achieved on-site, any shortfall should be provided in the form of a financial contribution to the borough’s offset fund or through an alternative off-site proposal. Development proposals referable to the Mayor, such as this, are also expected to be accompanied by a Whole Life-Cycle Carbon Assessment to demonstrate the anticipated whole lifecycle carbon emissions calculated from development over its lifetime and identify actions taken to reduce these.</p> <p>LP Policy SI 4 outlines how development proposals should minimise and manage heat risk. It explains that energy strategies submitted in support of major development proposals demonstrate how the development will reduce the potential for internal overheating and reliance on air conditioning systems. The policy goes on to then establish a cooling hierarchy with which such strategies should comply.</p> <p>SLP Policy 31 requires all residential buildings forming part of major developments to meet the following targets for reducing CO2 emissions expressed as a percentage improvement over Part L of the Building Regulations:</p> <ol style="list-style-type: none"> I. Achieve at least a 35% reduction in regulated CO2 emissions on site II. Offsetting the remaining regulated emissions (to 100%) through the delivery of CO2 reduction measures elsewhere through a Section 106 contribution to the council’s carbon offset fund priced at £60 per tonne over 30 years <p>In accordance with the above regional and local planning policy requirements, an Energy Statement and Sustainability Strategy has been submitted as part of this OPA. As detailed further below, it sets out the comprehensive approach that will be consistently applied to the regeneration of the Estate as a whole in seeking to reduce the environmental impact of the Proposed Development, in terms of both operation and demand.</p> <p>It is important to note that in relation to the existing Estate, the Options Appraisal (May 2021), prepared by Savills in support of the Case of Regeneration (as summarised in Section 3 of this Statement) confirms that a significant issue faced by the existing on-site housing is the “Poor energy efficiency of homes” and that “The homes also suffer from poor sound insulation as well as energy standards being lower than current day standards”. In seeking to meet up to date policy requirements and building standards, the Proposed Development, will therefore provide significant betterment in the standard of accommodation on the Site for both returning and new residents when compared to the existing provision.</p> <p>The submitted Outline Energy Statement and Sustainability Strategy provide details on the proposed measures and commitments that have been integrated into the Proposed Development and will guide the detailed design of future phases. As set out in the submitted documents, this is following consideration of a number of options to identify the most appropriate form of energy for the regeneration of the Estate and in seeking to reduce all greenhouse gas emissions in accordance with the energy hierarchy as well as in striving to achieve zero carbon in accordance with SLP Policy 31 and LP Policy SI 2.</p> <p>The proposed preferred energy strategy for efficiency purposes comprises an “Ambient Loop system” comprising a two-step heat pump process utilising Air Source Heat Pumps (ASHPs) located on the roof and Water Source Heat Pumps (WSHPs) located within each apartment. In addition, photovoltaic panels will be located throughout the roof space of the proposed development.</p>
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		<p>This fabric first approach comprising passive and active design measures at the “Be Lean” stage; a Ambient Loop network served by Air Source Heat Pumps (ASHP’s) at the “Be Clean” stage; and, Photovoltaic (PV) panels to supply renewable electricity at the “Be Green” stage. On the basis of the Illustrative Masterplan, the on-site target has been exceeded by 202.3 tonnes/CO2/year and report a combined reduction of 77%. This exceeds the minimum policy requirements but the shortfall in achieving the target of zero regulated carbon emissions will need to be off-set in accordance with GLA and LBS guidance. It equates to a shortfall of 63.6 tonnes/CO2/year and so results in a carbon off-setting payment of £181,246. It is expected that the principle of this will be secured through an appropriately worded planning obligation but the position and figure will ultimately be subject to the detailed design that comes forward through future Reserved Matters Applications and which will be supported by detailed Energy Assessments.</p> <p>An alternative energy strategy approach is also set out in the submitted Outline Energy Statement. This follows initial engagement with SDEN during the pre-application process and their preference for a ‘Low Temperature Hot Water’ (“LTHW”) system should the Proposed Development be required to connect into the district heat network in the future. However, at this stage, there remains uncertainty as to whether the planned expansion to Sutton Town Centre will take place. The LTHW option has therefore been presented and considered as part of the OPA to demonstrate it can be accommodated within the Maximum Parameters but the preferred energy strategy will ultimately be subject to the detailed design that comes forward. As such, it is anticipated that a site-wide strategy will be required in conjunction with future Reserved Matters Application and to include a feasibility study to show how the preferred option has been future-proofed to allow for connection to SDEN should it come forward and be viable at that point in time. This will be prepared in consultation with SDEN as those detailed proposals are progressed.</p> <p>In addition, a Passivhaus ready approach has been taken by the Applicant which is based on the Maximum Parameters and Illustrative Masterplan. It is expected that the Applicant will secure the principle of Passivhaus through a contractual agreement with the future developer. For the purposes of the OPA, it is the energy and sustainability targets, as set out in policy, only, which are to be identified and secured.</p> <p>On the basis of the above and the submitted Outline Energy Statement and Sustainability Strategy, it is clear that the construction and operation of the Proposed Development can be designed in order to optimise its environmental performance and contribute to the regeneration of the Estate in the most sustainable way. The proposed strategy has been subject to positive pre-application engagement with both LBS LPA and GLA Energy and Sustainability Officers and regarded to be acceptable in principle. It is therefore considered to meet the requirements of NPPF 158 – 160, LP Policy SI 2 and SLP Policy 31.</p> <p>In regards to overheating, the submitted Outline Statement demonstrates how the potential for internal overheating can be minimised through appropriate design solutions in accordance with the GLA’s cooling hierarchy. As is evident from the submitted assessment, this establishes guiding principles which have informed the Illustrative Masterplan and will similarly inform the detailed design development work undertaken to support future RMAs in order to satisfy the requirements of LP Policies D6 and S1 4.</p> <p>In addition, a Whole Life-Cycle Carbon Assessment has been undertaken and a Circular Economy Statement has been prepared. These have been submitted as part of this OPA to demonstrate the embodied carbon usage of each stage of the Proposed Development over its lifetime. It relates to the Estate as a whole, on the basis of the Illustrative Masterplan, with calculations and bill of materials ultimately subject to the detail that comes forward as part of future Reserved Matters Applications. Nonetheless, this provides an indication of what can be achieved on-site on the basis of the illustrative application of outline parameters. The submitted statement clearly sets out how the Proposed Development has the potential to satisfy the requirements of LP Policy SI 7 and the supporting assessment demonstrates how the Proposed Development has the potential to meet the GLA “benchmark” figures for Whole Life Carbon.</p>
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Flood Risk and Drainage	LP Policies SI 12 and SI 13 SLP Policy 32 SLP Allocation STC45	<p>LP Policy SI 12 reinforces national policy guidance and seeks to ensure that development proposals comply with the flood risk assessment and management requirements set out under this policy. It goes on to state that “development proposals should ensure that flood risk is minimised and mitigated, and that residual risk is addressed...”.</p> <p>LP Policy SI 13 seeks to ensure that sustainable drainage systems are incorporated into development proposals and should aim to achieve greenfield run-off rates with water run-off managed as close to its source as possible. It goes on to establish the drainage hierarchy which such systems should be designed with regard to. In line with NPPF 175, LP Policy SI 13 expects drainage systems to promote multiple benefits to include “increased water use efficiency, improved water quality, and enhanced biodiversity, urban greening, amenity and recreation”.</p> <p>Consistent with national and regional policy, at a local level, SLP Policy 32 states: “Previously developed sites: ensure that peak runoff rates and volumes for the 1 in 100 year event achieve greenfield runoff rates for the same event, unless it can be demonstrated that all opportunities to minimise final site runoff, as close as to reasonably practicable to greenfield runoff rates, have been taken in line with the Mayor’s drainage hierarchy. In such cases, runoff rates must not exceed 3 times the calculated greenfield rate in accordance with the Mayor’s Sustainable Design and Construction SPG”. SLP Policy 32 also sets the requirement for the drainage strategy to contain the 1 in 30 year event (plus climate change), without flooding and that any flooding occurring between the 1 in 30 and 1 in 100 year (plus climate change) will be safely contained on site.</p> <p>With reference to the EA’s Flood Map for Planning, the Site is located within Flood Zone 1 which indicates low probability of flooding and therefore in accordance with SLP Policy 32 is located in an appropriate low risk area.</p> <p>A Flood Risk Assessment and Drainage Strategy have been submitted as part of this OPA which sets out the comprehensive approach to water management and drainage that will underpin the regeneration of the Estate as a whole. In accordance with national, regional and local planning policy requirements, the submitted assessment and strategy demonstrates that the Proposed Development will be safe from all sources; incorporates appropriate management and drainage methods; and, will not result in an increase in flood risk within the Site or elsewhere.</p> <p>The Proposed Development is identified to be at a low risk of flooding from all sources, to include fluvial, surface water and groundwater flooding. The design incorporates a sustainable drainage system which has been designed to accommodate the 100-year rainfall event with a 40% allowance for climate change. As set out in the submitted Drainage Strategy, and based on the Illustrative Masterplan, the system will comprise a number of urban drainage methods to include blue/green roofs, permeable paving, soft landscaping and below ground attenuation tanks. This therefore aligns with drainage hierarchy set out under LP Policy SI 13 by facilitating attenuation via green infrastructure features and discharge direct to the existing network introducing controlled measures in the form of surface water sewers / drains.</p> <p>As a result of the combined measures, the submitted Drainage Strategy confirms that the Proposed Development will significantly reduce run-off and can achieve greenfield run-off rates across the Estate as a whole in accordance with LP Policy SI 13 and SLP Policy 32. On the basis of the Illustrative Masterplan, the proposals will restrict run-off to a Qbar rate of 1.4 l/s and a Q100+40% rate of 4.4 l/s which will provide significant betterment when compared to the existing drainage position.</p> <p>Noting the long-term nature of the Proposed Development, the sustainable drainage system will be installed in intervals as part of the comprehensive approach to the phasing of the regeneration of the Estate. As set out in the submitted Illustrative Demolition and Construction Phasing Strategy, this has been configured to ensure that the necessary new infrastructure, such as drainage, will come forward alongside residential units as is appropriate on a phased and/or plot basis and therefore is in place to support the needs of future residents at each point of the delivery programme. This is in addition to ensuring that live drainage serving the existing buildings on the Site will be maintained for as long as is necessary in line with their retention and occupation ahead of redevelopment.</p> <p>On the basis of the above, the comprehensive approach to water management and drainage is considered to wholly accord with the guiding principles of the NPPF and the requirements of LP Policies SI 12 and SI 13, and SLP Policy 32. It incorporates appropriate methods to ensure the Proposed Development is safe from all potential sources of flooding over its lifetime and with a sustainable drainage system and attenuation features in place will ensure that the risk of flooding is not</p>
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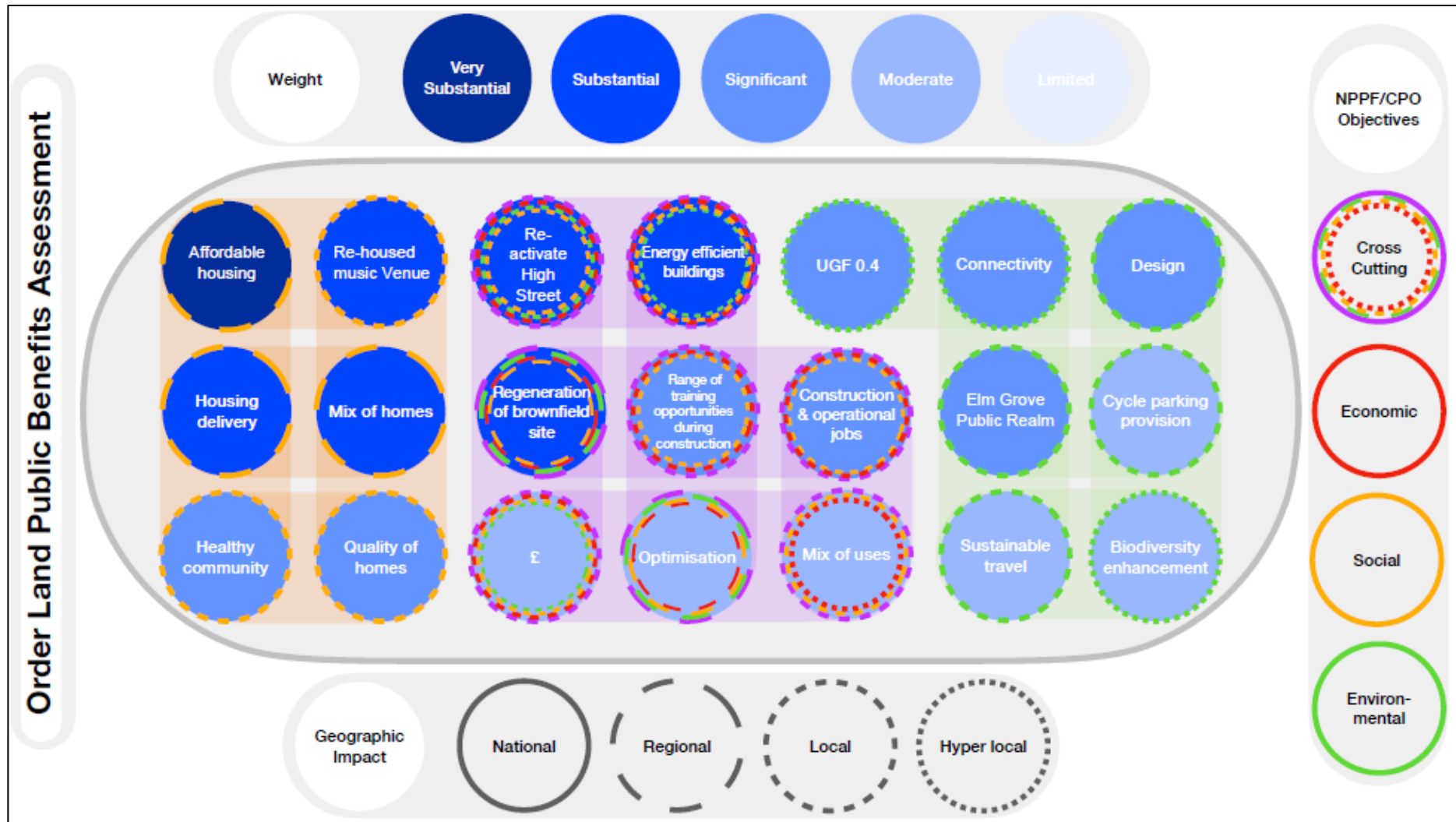
		increased on the Site or elsewhere. In turn, the integrated methods and features will contribute to improved water quality, enhanced biodiversity and urban greening providing multiple benefits as sought by NPPF 175 and LP Policy SI 13.
Air Quality	LP Policy SI 1 SLP Policy 34	<p>LP Policy SI 1 is clear that development proposals should not lead to “a) further deterioration of existing poor air quality; b) create any new areas that exceed air quality limits, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits; and c) create unacceptable risk of high levels of exposure to poor air quality”. As such, development proposals will be expected to be at least Air Quality Neutral and, for development proposals in an Air Quality Focus Areas, should demonstrate that design measures have been used to minimise exposure. Air Quality Assessments are required to be submitted as part of planning applications for major development proposals to demonstrate compliance with this policy.</p> <p>At a local level, SLP Policy 34 requires that all major developments with potentially adverse impact on air quality, located within 150m of a sensitive receptor, should be accompanied by an Air Quality Assessment. SLP Policy 34 also requires development proposals to seek to contribute towards the achievement of national air quality objectives as far as possible and support the objectives of the Council’s Air Quality Action Plan and states that development proposals should seek to be ‘air quality neutral’.</p> <p>In accordance with LP Policy SI 1 and SLP Policy 34, an Air Quality Assessment (“AQA”) has been undertaken and submitted as part of this OPA. It comprises an Air Quality Neutral Assessment and Air Quality Positive Assessment. The Assessment has given consideration to the Maximum Parameters, as established through the Parameter Plans, and the Illustrative Masterplan. It therefore provides an indication of the air quality impacts of the Proposed Development and establishes guiding principles which will inform the detailed design that comes forward as part of future RMAs to ensure continued compliance with planning policies cited above.</p> <p>During construction, the AQA identifies in terms of the potential for construction dust impacts that with the proposed mitigation in place, the overall residual effect will be reduced to an “insignificant level”. In taking into consideration anticipated volumes of demolition and construction traffic, the maximum duration of the demolition and construction phases and the implementation of a Construction Environmental Management Plan (CEMP), emissions will be likely to be not significant. Specific mitigations are identified at Section 7 of the AQA and, at this stage in the planning and development process, this has informed the submitted Illustrative Demolition and Phasing Strategy (including Demolition and Construction Method Statement) and the Outline Construction Logistics Plan.</p> <p>In terms of operation, emissions from road vehicles and energy generation during the operational phase have been scoped out of AQA as they are either below the relevant criteria or are from clean sources generating no emissions. Therefore, there are no significant air quality impacts during operation.</p> <p>In seeking to be at least “air quality neutral” in accordance with LP Policy SI 1 and SLP Policy 34, the Air Quality Neutral Assessment confirms that it is concluded that the Proposed Development is neutral for both building emissions and transport emissions. As such, no air quality related mitigation measures are required during the operational phase of the Proposed Development.</p> <p>Overall, the assessment demonstrates that the Proposed Development will not have any significant impact in regards to air quality, both in terms of the health and quality of life for existing neighbouring residents and returning and new residents to the Estate. The Proposed Development will be better than “air quality neutral” on the basis of the Illustrative Masterplan. It is therefore considered to satisfy the requirements of NPPF 192, LP Policy SI 1 and SLP Policy 34 and provide the potential for air quality positive development.</p>

Noise	LP Policies D13 and D14 SLP Policy 34	<p>LP Policy D13 establishes the “Agent of Change” principles which places the responsibility for mitigating the impact of noise and other nuisances on new development on the applicant. This in the interest of ensuring existing “...noise and other nuisance- generating uses remain viable and can continue or grow without unreasonable restrictions being placed on them”. As such, development proposals are expected to be designed to mitigate and minimise existing and potential nuisances.</p> <p>LP Policy D14 is consistent with national planning policy guidance and establishes a criteria which should be followed in order to “reduce, manage and mitigate noise to improve health and quality of life”. This includes “mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on existing noise-generating uses” and “improving and enhancing the acoustic environment...”. Good acoustic design principles are expected to be incorporated into noise-sensitive developments to mitigate the potential for adverse effects where they cannot be separated from noise sources without undue impact on other sustainable development objectives.</p> <p>At a local level, SLP Policy 34 states that noise sensitive developments, including residential development, should be separated from major noise activities wherever practicable. SLP Policy 34 also states that where a proposal is sited near to noise-generating uses, a Noise Assessment should be submitted to determine whether the overall effect of noise exposure would be acceptable.</p> <p>A Noise Survey and Assessment has been undertaken and submitted as part of this OPA which determines the existing environmental noise climate at the Site, identifies any potential impacts on future residents of the Proposed Development and outlines any potential impacts on neighbouring sensitive receptors as a result of the Proposed Development. Where potential impacts have been identified, appropriate mitigation is proposed. This establishes good acoustic design principles that will inform the detailed design development work undertaken to support future RMAs.</p> <p>As part of the Assessment, an environmental noise survey was undertaken to obtain baseline noise levels generated by the main noise sources affecting the Site. This established Throwley Way along the eastern boundary of the Site to be the main noise source as a primary vehicular route within the local highway network. Based on the measured sound levels, the assessment has identified that the proposed development is classified as a ‘high’ risk location. Having regard to LP Policy D13 and recognising and responding to the fact that this is an existing noise generating source, the noise levels have been used to build an acoustic model of the Site which has then in turn been used to provide recommendations for glazing and ventilation for the new residences to achieve acceptable internal noise conditions and inform the possible acoustic overheating solutions as reflected in the design and building specification for the Illustrative Masterplan and principles contained within the Design Code. It demonstrates how suitable noise levels can be achieved in internal areas of the new residential properties (to include in relation to non-residential uses at 216-220 High Street) and the external amenity areas where the solutions identified are designed in.</p> <p>In terms of construction, given the proximity of neighbouring noise sensitive receptors, to include residential properties to the Site, it is considered that associated activities to include site clearance, preparation and construction noise may impact these receptors. However, through best practice measures as set out in the submitted assessment and Illustrative Demolition and Phasing Strategy (including Demolition and Construction Method Statement), it is considered that noise from construction operations can be controlled and monitored to ensure the relevant limits are not exceeded.</p> <p>During occupation, and based on the Illustrative Masterplan, the Proposed Development will have a negligible impact on the surrounding environment in terms of traffic noise. This is on the basis that the Proposed Development will result in a reduction of car parking on-site when compared to the existing provision and provide new and enhanced pedestrian and cycle routes promoting and facilitating travel by sustainable modes. Therefore, as set out earlier within this section, the Proposed Development will not have a material impact on the existing highway network in terms of vehicular movement so there will be no adverse impacts arising in relation to road traffic noise. It is therefore considered to be fully accord with the requirements of SLP Policy 34.</p> <p>On the basis of the submitted assessment, it is therefore considered that the Proposed Development will not result in any residual significant or other adverse impacts on the health and/or quality of life for future residents. The future phases of the regeneration of the Estate provide the opportunity for detailed design to be</p>
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		configured to ensure the lowest practicable levels are achieved in creating a high quality residential environment both internally and externally and, where required, mitigation will be planned in. It is therefore considered to comply with NPPF 191, LP Policy D14, and SLP Policy 34.
Fire Strategy	LP Policies D5 and D12	<p>LP Policy D12 states that “in the interests of fire safety and to ensure the safety of all building users, all development proposals must achieve the highest standards of fire safety”. It goes on to provide a set of criteria that must be satisfied in order to ensure this and outlines that a Fire Safety Statement must be submitted as part of planning applications for major development proposals to demonstrate compliance and provide details on how the development proposals will function in accordance with a further set of requirements.</p> <p>Planning Gateway One requires that for development comprising a “relevant building”, as defined by the guidance, a Fire Statement must be submitted as part of any relevant planning application setting out the fire safety considerations specific to the development proposals and the Health and Safety Executive should be established as a statutory consultee on the application. Whilst the Proposed Development comprises “relevant buildings”, the outline nature of the planning application means it is exempt from Planning Gateway One at this stage. It will trigger the requirements of Planning Gateway One through the future Reserved Matters Applications and on the basis of the detailed design that comes forward.</p> <p>In accordance with the LP Policy D12, an Outline Fire Safety Strategy has been submitted in respect of the application. It identifies the principles that should be applied to any future RMA to ensure all buildings achieve the highest standards of fire safety in compliance with the criteria set out under this policy.</p> <p>The strategy outlines that as part of the Illustrative Masterplan, appropriate space has been made available for fire appliances; that appropriate provision has been made for evacuation; and that the proposals are designed to incorporate appropriate features to reduce the risk to life and serious injury in the event of fire (including fire alarm systems, sprinklers, ventilation and compartmentation). Consideration has also been given to the buildings construction methods and materials; means of escape, water supply; firefighting lifts and stairs.</p> <p>The Statement confirms that the proposals comply with LP Policies D5 and D12 in relation to fire safety considerations.</p>

Appendix 10

Summary of Benefits Table



Appendix 11

Infographics





Elm Grove Estate & 216-220 High St., LB Sutton

Savills Social Value Summary

Social Value includes the additional social, economic and environmental benefits that can be secured over and above core requirements. The Proposed Development at Elm Grove Estate & 216-220 High Street, Sutton is anticipated to generate significant social value benefits.

The Proposed Development provides the opportunity for social value gains in both the construction and operational phases

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Skills and Employment

The proposal will benefit the local community through a variety of education focussed means. The scheme would deliver training opportunities for young people and positions for new entrants which are estimated based on benchmarks from the National Skills Academy for Construction.

WORK PLACEMENT

£53,000 Estimated social value of non-paid work experience placements (25) for students from schools and colleges delivered during the construction period

APPRENTICESHIP

£260,000 Estimated social value of apprenticeships (30) delivered during the construction period

CONSTRUCTION CAREER EVENTS

£60,000 Estimated total social value of Construction Careers Information, Advice and Guidance Events (12 events)

SKILL AND QUALIFICATION GAINED

£186,000 Estimated total social value of Qualifications achieved (equiv. NVQ2 or above) – 43 non-apprentice workers



Community Benefits

An assumption can be made regarding the number of construction workers who have been previously unemployed based on similar projects and number of Job Seeker's Allowance (JSA) claimants. Associated NHS savings with returning to work are estimated based on the Oxford Economics findings from Cost-benefit analysis for the Department for Work and Pensions (2010). Associated NHS savings from the use of public realm are estimated based on Fields in Trust: 'Revaluing Parks and Green Spaces' (2018).

It is assumed that the proposal will deliver community benefits through local procurement targets for the construction phase of development and from any required maintenance works in the future. The estimate for local procurement (10% of project value) assumes best practice is achieved.

UNEMPLOYMENT REDUCTION

£328,000

Estimated social value of hiring those who are not in employment, education, or training (NEETs) during the construction period

NHS SAVINGS FROM UNEMPLOYMENT REDUCTION

£44,000

Estimated NHS saving assuming that expenditure on unemployed person is double the average NHS expenditure during the construction period

SUPPORTING LOCAL BUSINESSES

£6.7 MILLION

Estimated total value of local procurement during the construction period assuming 10% of all monies spent locally

NHS SAVINGS FROM THE USE OF PUBLIC REALM

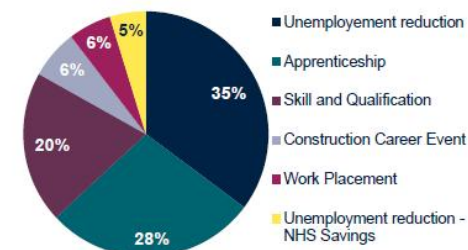
£2,800 PER ANNUM

Estimated NHS saving based on estimates of a reduction in GP visits by regular park users in the UK population

INDICATIVE TOTAL SOCIAL VALUE*

£7.1 MILLION

Community Savings and Apprenticeship Value Delivered Over the Construction Period



* Net Present Value (NPV) discounted at Treasury Green Book rate of 3.5% pa starting 2024