

Planning Statement

Mixed-use Development

City House, Sutton

February 2024

Contents

| | |
|--|-----------|
| 1. Introduction | 4 |
| Site and Surroundings | 4 |
| Planning History | 5 |
| Pre-Application | 5 |
| Community Engagement | 6 |
| Recent Planning Consents and Completions | 7 |
| 2. Decision Making Framework | 11 |
| Development Plan | 11 |
| Material Considerations | 11 |
| Heritage Framework | 12 |
| Housing Land Supply | 12 |
| 3. The Proposal | 13 |
| Existing Use | 13 |
| Proposed Development | 13 |
| 4. High-Quality Office Space for Sutton Town Centre | 14 |
| Site Allocation | 14 |
| Proposed Office Space | 14 |
| 5. New Homes for Sutton Town Centre | 16 |
| Housing Delivery Test | 16 |
| Proposed Unit Mix | 16 |
| Sustainable Location for New Homes | 17 |
| 6. Affordable Housing | 19 |
| 7. High Quality Homes for Sutton Town Centre | 20 |
| Accessibility | 20 |
| Natural Light | 21 |
| Private and Communal Amenity Space | 21 |
| Play Space | 21 |
| 8. Place Shaping Through Design & Massing | 23 |
| Tall Building Assessment | 25 |

| | |
|---|-----------|
| 9. Other Planning Considerations | 31 |
| Energy & Sustainability | 31 |
| Drainage and Flood Risk..... | 32 |
| Air Quality | 32 |
| Transport and Highways | 32 |
| Waste and Refuse..... | 33 |
| Wind | 33 |
| 10. Conclusion..... | 35 |

1. Introduction

- 1.1. This Planning Statement is prepared on behalf of Macar Living (City House) Ltd, for the proposed redevelopment of City House, Sutton Park Road, Sutton, SM1 2AE.
- 1.2. The proposal comprises comprehensive redevelopment, delivering a part 5-storey and part 13-storey building, to provide 70 'Build to Rent' residential apartments (Class C3), 191m² (NIA) of office space (Class E(g)(i)) and associated landscape and public realm improvements.
- 1.3. The proposal presents an opportunity to optimise the use of an underutilised site by providing much-needed housing, and employment, in a highly accessible, sustainable location.

Site and Surroundings

- 1.4. City House is an existing 3 storey building in office use, sat within a site of approximately 0.18ha. The site is located on a key corner location on the prominent road junction of Sutton Park Road and Cheam Road.
- 1.5. The site falls within Sutton Town Centre¹, which the London Plan categorises as a Metropolitan Centre (one of only 14 across the capital)² with 'high' residential growth potential. The Town Centre is also now an Opportunity Area, following this designation within the 2021 London Plan.
- 1.6. The site has a PTAL of 6a. Sutton Railway Station is 0.3 miles from the site, approximately a 5 minute walk, and the town centre is very well served by buses. The London Plan identifies the proposed extension of the south London tram system into Sutton Town Centre as a key future transport project, which would create even better connections with surrounding centres and other important transport corridors.
- 1.7. The site is also subject to the following Local Plan policies:
 - Area of potential intensification
 - Area of taller building potential
 - Secondary shopping frontage
 - Adjacent to the Sutton Town Centre Conservation Area

¹ As defined by the Local Plan

² Other Metropolitan Centres include Croydon, Kingston & Bromley

1.8. The site is allocated in the Local Plan (Ref: STC32), which indicates a housing capacity of 22 net additional dwellings, and 680m² of retail floorspace. The development should also pay particular regard to the following:

- Providing active frontages on the ground floor along Sutton Park Road and Cheam Road in the form of retail or other town centre uses
- Providing a building up to 4 storeys in height, ensuring the design is sympathetic to the adjacent listed Baptist Church
- Providing a mix of residential dwellings
- Protecting land for a Tramlink along the Sutton Park Road and Cheam Road frontages
- Providing high quality public realm and pedestrian improvements on the Sutton Park Road and Cheam Road junction
- Enabling connection to any planned decentralised energy network serving the town centre
- Providing a flood risk assessment and appropriate Sustainable Urban Drainage System measures

1.9. The adjacent 'Cheam Road (A232) / St Nicholas Way / Sutton Park Road junction' is identified by Local Plan Policy 35 as requiring critical improvements regardless of Tramlink. The purpose is to *“transform the existing gyratory system to make the roads less traffic dominated and more pedestrian and cycle friendly, including measures to encourage shared space, reassignment of priorities and landscape improvements”*.

1.10. The Sutton Town Centre Transport Options Appraisal Study³ – Transport Interventions Technical Note (Report 3 of 3) explains that the Cheam Road / Sutton Park Road junction is constrained by the left turn from Sutton Park Road into Cheam Road, and recommends introducing a second lane, necessitating the acquisition of third party land on the western side of the junction.

Planning History

1.11. The site is subject to a single previous planning application⁴. Permission was granted in 1995 for the erection of a three-storey building for office purposes and provision of car parking facilities. This is the operative consent for the building that currently exists on the site.

Pre-Application

³ Aecom 2016

⁴ Application Ref. S/95/39822/FUL

- 1.12. The proposed scheme underwent a series of pre-application meetings⁵ and design review panels⁶ with the London Borough of Sutton and Design South East from October 2022 to November 2023.
- 1.13. The neighbouring church, Sutton Baptist Church (Grade II* listed), and its relationship with the proposal was discussed in great detail throughout the pre-application process. The proposed scheme has been carefully designed to address previous heritage concerns and respect the neighbouring site.
- 1.14. The first pre-application submission presented a proposal for a part 9-storey, part 13-storey, part 18-storey building.
- 1.15. The Council's advice to reduce the scale of the proposal has been taken on-board by the Applicant's design team, and consequently the proposed scheme has evolved from having a maximum height of 18-storeys, down to 13-storeys across two massing blocks instead of three. As a result, it is considered that the proposal would sit well within the surrounding context and would not cause insurmountable harm to the setting of the neighbouring church.

Community Engagement

- 1.16. As per paragraph 56 of the NPPF, the Applicant has been committed to ensuring all interested parties are involved within the planning process.
- 1.17. A leaflet was delivered to 2,757 surrounding addresses advertising for a webinar on the proposal on 19th July 2023 whereby there were seven attendees, predominantly from the neighbouring apartment block at 4 Sutton Park Road. The webinar provided an opportunity for the Applicant to present the proposed scheme, as well as respond to any questions and suggestions on the proposal.
- 1.18. Direct conversations have also taken place with the neighbouring Baptist Church, discussing how the proposal could provide public realm improvements between the site and the Church.
- 1.19. A second consultation took place on 5th December 2023 via webinar format. Ten people registered for the event and six attended. The project team gave a presentation with updates from the initial event and also used this opportunity to address some of the feedback that we had received following the first event. The presentation was followed by a Q&A session, which allowed residents to seek any further clarifications.
- 1.20. Following the second consultation event attendees, and those who registered, were sent a copy of the presentation and encouraged log their feedback via the project website, email address or the Freephone and Freepost options available. A copy of the presentation was also uploaded on to the project website.

⁵ Ref. PRE2022/00182

⁶ Ref. 1976/230223 and Ref. 2040/140923

- 1.21. In the aftermath of both events, Meeting Place on behalf of the applicant continued communications with a number of residents who had further questions about the application which hadn't been asked during the events.

Recent Planning Consents and Completions

- 1.22. A number of planning applications have been consented within Sutton Town Centre that have relevance to this proposal. These applications are described below.

St Nicholas House

- 1.23. The St. Nicholas House site was granted planning permission⁷ in September 2019 for the demolition of the existing building and the erection of two buildings reaching 18 storeys. This is to comprise of 276 residential units and a mix of uses (Classes A1/A3/B1(a)/D2) at the ground floor. The proposal would lead to a loss of office floorspace in Sutton, however, the applicant demonstrated that the existing offices are surplus and the demand for office space in Sutton is in decline. The mix of uses proposed was considered acceptable, with the provision of residential units identified as a significant benefit. The proposed development would exceed the acceptable height range in the Local Plan, though, compared to the existing building, it is understood that the proposal's exemplary design would not result in harm to the significance of heritage assets or their setting.
- 1.24. The Officer's Report concluded that the proposed scheme *"would not result in harm to the setting of the adjacent Grade II* listed St Nicholas Church and would improve the vista along St Nicholas Road to the church"*⁸. No heritage objections were raised notwithstanding its height and proximity to the listed church. Additionally, the report concluded that *"It is the design of the footprint of the towers and the proportions of the towers when viewed in the context of the building as a whole that give the 18 storey towers a more slender and elegant appearance and prevents the building from appearing squat or overly bulky. The setting back of the towers, within the site, helps to alleviate the additional height and mass of the development and also provide a larger and improved public realm along St Nicholas Road and St Nicholas Way"*⁹.
- 1.25. With regard to the site's former use, the proposal is to demolish office space for the delivery of residential units. Though this, like the proposal's height, diverges from Local Plan policy, the former office space was considered *"dated"*, lacking in *"aesthetic appeal"* generally poor performing, and surplus. These conclusions were supported by the fact that *"there has been a notable decline in the office market in Sutton Town Centre and this has led to an absence of investment in new or even refurbished office space"*¹⁰.

⁷ Application Ref. DM2019/01309

⁸ Page 1

⁹ Para 5.51

¹⁰ Para 5.21

1.26. A revised application¹¹ was submitted 5th January 2022, and the key changes of the revised application are as follows:

- A change from market residential units to a Build to Rent product to enable delivery of a scheme on this Site;
- An increase of 5 residential units;
- Increase in overall height to 19-storeys within a comparable envelope to the consented scheme, with 9-storey and 11-storey elements lower in height than the consented scheme;
- Internal re-configuration of consented floorplan.

1.27. Within the Stage 1 GLA report¹², the principle for intensified residential use was supported, and the increase in the proposed flexibility of the Class E space compared to the extant permission was also welcomed. Regarding heritage impact, 'less than substantial harm' was identified, and therefore the GLA are to consider an agreed public benefits package to reach an overall conclusion. It was noted that the proposed building "*is less prominent than the existing buildings along the High Street, including the locally listed ones, and fits within the wider townscape and roof line of the buildings within the Conservation Areas*"¹³.

1.28. That application has since progressed to Stage 2¹⁴. The application is currently awaiting Stage 2 determination.

24-34 Sutton Court Road

1.29. 24-34 Sutton Court Road, a 21-storey residential development set to deliver 165 flats, was granted planning permission¹⁵ in December 2018. Though the proposal technically exceeds the Local Plan's recommended threshold for taller buildings by 11-storeys, the application was met with no objections from Historic England; the Council concluded this proposal is "*a well-designed scheme which has a modern approach to design in this prominent location within Sutton Town Centre. The proposal is of an excellent architectural and urban design quality that will offer a significant improvement to the street scene, townscape and wider views beyond*"¹⁶. Further, it was reported to the Planning Committee that, "*It is considered that although the scale and height of the proposed development is considerably greater than the existing buildings on site the quality of the design of this scheme is exemplary and will redefine the appearance of this part of the Town Centre creating a new and exciting built environment.*"¹⁷ Despite

¹¹ Application Ref. DM2022/00013

¹² GLA Reference GLA/2022/0146/S1/01

¹³ GLA Reference GLA/2022/0146/S1/01, paragraph 82

¹⁴ GLA Stage Reference 2022/0268/S2

¹⁵ Application Ref. B2017/77476

¹⁶ Page 10

¹⁷ Para 5.54

being located near a Conservation Area, the benefits shared amongst the public and future residents via the delivery of this proposal were worthy of deviating from Local Plan policies.

Rear of Times Square Shopping Centre

- 1.30. The Planning Committee resolved to grant planning permission¹⁸ in March 2021 for the erection of a 20-storey building above ground level to accommodate 113 residential units, including a children's play facility (Class E), refuse storage, two basement levels providing cycle parking and ancillary facilities. The Decision Notice was issued 30th November 2022, and the committee report recorded that *"The design is considered to be of an exceptional standard, taking account of the quality of the proposed architecture and improved public realm to Throwley Way. This is considered to form a material consideration of considerable weight which justifies a departure from the Council's adopted policy on building heights in this particular location"*¹⁹.

92-94 High Street

- 1.31. The proposal at 92-94 High Street and 1B Throwley Way, sought to deliver a new 12-storey building²⁰. The application has been reviewed by the GLA and the Urban Design & Conservation Consultee, as well as other consultees. The Urban Design & Conservation Consultee stated, *"The proposals would cause 'less than substantial harm' to heritage assets at a moderate to low level which could be outweighed by public or heritage benefits". This is because the consultee considered the proposal to be of "high quality and an elegant addition to the skyline both from the High Street and Throwley Way / Manor Park and would be supported."* The GLA's Stage 1 report from 3 October 2022 reflected those same beliefs.
- 1.32. This application was withdrawn in April 2023, however the commentary provided by the GLA is still relevant.

B&Q Site

- 1.33. An application²¹ was submitted 26th September 2022 at the B&Q site for the demolition of the existing buildings and structure, to provide up to 970 residential units and 929 m² (GEA) of commercial uses.
- 1.34. The application received its GLA Stage 2 report²² on 18 December 2023. The report found *"less than substantial harm to the significance of the designated heritage assets is clearly and convincingly outweighed by public benefits of the proposals."*²³ The site is located within the setting of eleven heritage assets.

¹⁸ Application Ref. DM2020/01573

¹⁹ Para 2.3

²⁰ Application Ref. DM2022/00925

²¹ Application Ref. DM2022/01764

²² GLA Reference GLA/2023/0431/S2

²³ GLA Reference GLA/2023/0431/S2, Paragraph 69

- 1.35. The proposal was granted planning permission on 19th December 2023. The proposed buildings would range from 6-storeys to 21 storeys and would provide 25,124 m² of private residential amenity space.

Former Victoria House, 388 Malden Road

- 1.36. An application²⁴ for a part-4 part-7 storey mixed use building with 74 residential units and up to 265m² of commercial floorspace was granted planning permission on 22 December 2023, following the recommendation for approval at the 1 February 2023 Planning Committee.
- 1.37. The existing site was allocated within the Local Plan (S35) for residential, retail and town centre uses. Though the scheme proposed 265m² of space for town centre use, the indicative non-residential capacity of the site was 1,128m². However, that capacity was based on an expired planning permission²⁵. Soft market testing was conducted, and the prior indication of non-residential capacity was considered, and it was found that the provision of a smaller amount of flexible commercial space would be acceptable and would help to revitalise the North Cheam District Centre.
- 1.38. By way of effective land use, high quality design, appropriate provision of affordable housing, secure amenity for neighbouring properties, and sufficient levels of off-street parking and servicing, the proposal was found to be in line with the Development Plan and was granted planning permission by the Council.

²⁴ Application Ref. DM2021/02555

²⁵ Application Ref. A2013/67211

2. Decision Making Framework

- 2.1. This section articulates the decision making framework for the proposal.
- 2.2. Planning applications are to be determined in accordance with the Development Plan unless material considerations indicate otherwise²⁶.

Development Plan

- 2.3. The Development Plan is comprised of:

- The London Plan (March 2021)
- Sutton Local Plan (July 2018)

Material Considerations

- 2.4. A revised NPPF was published (December 2023) and is an important material consideration in decision making, particularly with regard to land use optimisation.
- 2.5. The NPPF also explains that *“Local planning authorities may give weight to relevant policies in emerging plans according to:*
- *“The stage of preparation of the emerging plan...*
 - *“The extent to which there are unresolved objections to relevant policies....and;*
 - *“The degree of consistency of the relevant policies in the emerging plan to this Framework”²⁷.*
- 2.6. When weight is given to these emerging policies, they are material considerations.
- 2.7. Sutton’s emerging Local Plan is at a very early stage of preparation, and LB Sutton opened a call for sites between 16th September and 18th November 2022. Currently no weight can be attributed, however, this will increase as the draft moves through the relevant statutory process.
- 2.8. The Greater London Authority (GLA) and LB Sutton have several additional documents which are material considerations relevant to this application:
- GLA Affordable Housing and Viability Supplementary Planning Guidance (SPG) (August 2017)
 - GLA Housing SPG (March 2016)
 - GLA Play and Informal Recreation SPG (September 2012)
 - Sutton Affordable Housing and Financial Viability SPD (March 2020)

²⁶ S38(6) Planning and Compulsory Purchase Act 2004

²⁷ NPPF Paragraph 48

- Sutton Town Centre Masterplan (June 2016)
- Sutton Taller Building Study (October 2008)
- Sutton Town Centre Conservation Area Character Appraisal and Management Plan (October 2019)
- Sutton Urban Design Guide (January 2008)
- Sutton Town Centre Public Realm Design Guide (January 2020)

Heritage Framework

- 2.9. The site is outside (albeit on the edge) of Sutton Town Centre Conservation Area and thus the statutory test (s.72 of the Planning (Listed Buildings and Conservation Areas) Act 1990) does not apply.
- 2.10. The site is within the setting of Sutton Baptist Church (Grade II* Listed). Therefore Section 66(i) of the Planning (Listed Buildings and Conservation Areas) Act 1990 also applies to this proposal, which states *“In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses”*.
- 2.11. The following case law is particularly instructive where planning decisions are to be made in the context of heritage assets. First, the *Forge Field* Judgment²⁸ explains the proper application of the above statutory tests, and their interplay with the Section 38(6) statutory test.
- 2.12. The more recent *Bramshill* Judgement²⁹ affirms that the approach in *Bohm*, amongst others, is a legitimate methodology for applying the relevant statutory tests for heritage, as well as the heritage test in the NPPF. It confirms further that other methods of applying Section 72 would not result in different conclusions, provided the other methods are also valid.
- 2.13. A Heritage, Townscape and Visual Impact Assessment is included with this application.

Housing Land Supply

- 2.14. It is noted that the London Borough of Sutton has published a document³⁰ that reports the Council maintains a 6.01 year of housing supply.
- 2.15. The Applicant reserves its position on this matter.

²⁸ R (on the application of) Forge Field Society & Others v Sevenoaks DC & Interested Parties [2014] EWHC 1895 (Admin)

²⁹ City & Country Bramshill Limited v Secretary of State for Housing, Communities and Local Government and others [2019] EWHC 3437 (Admin)

³⁰ Five-Year Housing Land Supply Assessment 2022-23 to 2026-27 (April 2022)

3. The Proposal

Existing Use

- 3.1. The existing site is in office use (Class E), with a NIA of 845m², with 26 ancillary car parking spaces.

Proposed Development

- 3.2. The proposal is to comprehensively redevelop the site, replacing the existing block with a part 5-storey and part 13-storey building.
- 3.3. This proposed massing has been arrived at as a result of pre-application discussions with LB Sutton, as well as two formal presentations to the Council's Design Review Panel (administered by Design South East). The current proposed massing optimises the site's development potential with respect to balancing Sutton Town Centre's policy presumption for height, townscape, and heritage sensitivities, as well as ensuring the proposal is deliverable owing to financial viability.
- 3.4. The proposed design is explained in further detail within the accompanying Design and Access Statement by Wimshurst Pelleriti Architects.
- 3.5. The proposed massing would allow for an efficient floorplan that can optimise both 'built to rent' residential and office space. Typical upper floors would contain 4-8 apartments, and 70 residential apartments would be accommodated in total.
- 3.6. The ground floor would re-provide 191m² (NIA) of high-quality office space. Necessary residential and office ancillary functions would also be provided on the ground floor and fifth floor.
- 3.7. The proposal would deliver substantial public realm improvements to the site, which would be future proofed so that it could be connected to any future public realm improvements in the nearby vicinity. Further detail on this is set out on pages 40-44 of the Design and Access Statement.

4. High-Quality Office Space for Sutton Town Centre

- 4.1. The existing office space has a NIA of 845m² and this space is of only medium quality; the current energy rating is C and the building layout provides an inefficient floorplate.

Site Allocation

- 4.2. The Site Allocation (STC32) sets out that active frontages should be provided on the ground floor in the form of retail or other town centre uses. Whilst the site is located within the Secondary Shopping Frontage, it is 100m distant (with visual separation) from the nearest shop (Yummy's Sandwich Bar) on Cheam Road which spurs off the High Street, and thus retail use would not be viable in this part of Sutton Town Centre. This is reconfirmed within the accompanying report authored by Stiles Harold Williams.
- 4.3. As permitted under the allocation, and noted by LB Sutton within their pre-application response, it is necessary to consider 'other town centre uses', with offices as the obvious and more appropriate alternative, which would provide wider economic benefits to Sutton. The re-provision of 191m² (NIA) of office floorspace would ensure this is delivered.
- 4.4. To further support Sutton Town Centre, the Applicant is looking to secure memberships for amenities within the Town Centre such as for local gyms, for future residents. This would therefore provide additional benefit to Sutton, further supporting the vitality of the town centre.
- 4.5. Whilst an indicative capacity of non-residential use is cited as 680m², this is based on the crude 3D modelling within the 2016 Masterplan and accompanying Capacity Study, which doesn't appear to factor the need for some of the ground floor area to be required for the stair and lift core and other ancillary residential facilities – e.g. waste and bicycle storage. Nor is it based on any up-to-date demand analysis.

Proposed Office Space

- 4.6. The proposal would re-provide 191m² (NIA) of high-quality office floorspace at the ground floor, designed for occupation for Macar Developments (as its head office) but with flexibility for any other occupier in case circumstances were to change.
- 4.7. The proposed office floorspace would be Grade A, providing a much higher quality of office floorspace than the existing. The proposed NIA is in relation to the space required by Macar to occupy this space as their head office whilst providing flexibility for any other occupier in case circumstances were to change. This therefore ensures that any future tenants would not be speculative, ensuring certainty of occupation and preventing any office space being left vacant.

- 4.8. Prior to the Applicant acquiring the freehold for the site, the previous owners marketed the site for sale and occupation, and the only interest in the site was from developers looking to comprehensively re-develop the site, with no interest in occupying the existing office floorspace. Furthermore, since owning the freehold, the Applicant has continued to market the vacant office floorspace, however there has been little interest and no new tenants have been secured.
- 4.9. The Applicant notes Policy 16 of the Local Plan which sets out that the Council should “*not grant planning permission for proposals involving the loss of existing B1(a) office accommodation unless it is shown that the office accommodation is no longer required*”. The previous and current marketing demonstrates that office space demand is generally lacking in Sutton, and the existing quantum of office floorspace is surplus to requirement.
- 4.10. Despite the proposal's quantitative reduction in office floorspace (845m² NIA versus 191m² NIA), the proposal would enhance the current offer of office floorspace in Sutton, providing superior quality space. The need for higher quality floorspace is important given the current market conditions, and Policy 16 of the Local Plan sets out that over the Plan period, 23,000m² of new B1(a) office space should be delivered. Therefore the proposal would make an important contribution to this.
- 4.11. The Applicant is aware that a reduction of office floorspace was accepted by LB Sutton for St Nicholas House (ref: DM2019/01309), noting that the market for office floorspace in Sutton has been declining, with an outmigration of occupiers due to inferior transport connectivity in comparison to other town centres such as Croydon, Redhill and Leatherhead, and therefore, office floorspace is proving surplus to demand in Sutton.
- 4.12. The Committee Report for St Nicholas House notes that the former office space at St Nicholas House was considered “*dated,*” lacking in “*aesthetic appeal,*” generally poor performing, and surplus. These conclusions were supported by the fact that “*there has been a notable decline in the office market in Sutton Town Centre and this has led to an absence of investment in new or even refurbished office space*”. The Committee Report therefore concluded that due to “*the lack of demand for the office space at the application site, that the loss of the office space would be acceptable and would not result in harm vitality or viability of Sutton Town Centre*”. The accompanying report from Stiles Harold Williams also confirms the general lack of demand for office space in Sutton Town Centre.
- 4.13. Policy 16 of the Local Plan lends support to “*the development of office buildings providing company headquarters*” as is the case here. The proposed office floorspace would be further supported by Policy E1 of the London Plan, which establishes that improvements to the quality, flexibility and adaptability of office space of different sizes (for micro, small, medium-sized and larger enterprises) should be supported by new office provision, refurbishment and mixed-use development.

5. New Homes for Sutton Town Centre

5.1. The proposal would deliver 70 high-quality residential units, and the unit mix can be seen below:

Table 1: Proposed Unit Mix

| Unit Type | | | |
|--------------|-----------|-----------|-------------|
| 1-Bed | 11 | | 16% |
| 2-Bed | 55 | 2B3P – 23 | 79% |
| | | 2B4P – 32 | |
| 3-Bed | 4 | | 6% |
| Total | 70 | | 100% |

Housing Delivery Test

- 5.2. Between 2019/20 and 2021/22, LB Sutton had a minimum housing target of 1,211 net additional dwellings, including the 5% buffer required by the NPPF.
- 5.3. Sutton did exceed this target and delivered 1,490 net additional dwellings. Although the housing target has been met in recent years, relevant targets are minimums only.

Proposed Unit Mix

- 5.4. The Applicant recognises Policy 9 of the Local Plan, which states that development within Sutton Town Centre should seek to provide a minimum of 25% of all dwellings on the site as having three bedrooms or more, unless it can be demonstrated that this would be unviable or the particular site circumstances are not suitable for family housing.
- 5.5. Since there has been a reduction in mass following discussions with LB Sutton and DSE, to ensure the proposal remains financially viable, the extent to which this requirement can be met has been reduced.
- 5.6. The proposal has maximised the proportion of family homes as far as possible, as per the policy, including four 3-bedroom units. Of the 55 x 2-bed units, 32 of these (58%) would be 2B4P units, further maximising the percentage of family units on the site.
- 5.7. Policy 9 of the Local Plan states that development within Sutton Town Centre should seek to provide a minimum of 25% of all dwellings on the site as having three bedrooms or more, unless it can be demonstrated that this would be unviable or the particular site circumstances are not suitable for family housing. The submitted Financial Viability Assessment, authored by James Brown, confirms that the proposed scheme as designed is unviable in objective terms. Hence providing 25% of 3+ beds would

exacerbate the scheme's pre-existing viability challenges and would undermine the scheme's deliverability.

Sustainable Location for New Homes

- 5.8. The proposal would provide the optimal number of homes on the site, whilst offering a very sustainable location for residential use, re-developing an underutilised brownfield site, whilst conserving and enhancing the setting of nearby heritage assets.
- 5.9. The site is within Sutton Town Centre, within close proximity (approximately a 3 minute walk) to the amenities of Sutton High Street. The site has a PTAL of 6a, and is a 5 minute walk (0.3 miles) to Sutton Station, which provides access to both Thameslink and Southern Train services. The site is therefore well integrated with Sutton, London and those areas surrounding London. The site therefore has the two principal ingredients to justify high density development.
- 5.10. The site falls within the Area of Potential Intensification, which is defined in the Local Plan as “*areas around town centres where the intensification of housing development may be appropriate*” and therefore, given the site's very sustainable location, optimising the sites capacity should be supported.
- 5.11. Policy 1b of the Local Plan states that the Council will enable the delivery of new homes to help meet London's housing needs and local housing need by aiming to deliver at least 6,405 new homes over the plan period 2016-2031 (427 homes per annum) – now revised upwards to 469 homes per annum in the London Plan 2021. In order to achieve this target, the Policy states that the Council will allocate strategic sites for housing delivery, promote the redevelopment of Sutton Town Centre including with taller buildings in the Areas of Taller Building Potential, encouraging the intensification of areas around Sutton Town Centre and the borough's District Centres where suitable.
- 5.12. Furthermore, Policy 1 and Policy 3 of the Local Plan highlights that Sutton Town Centre, and the Area of Potential Intensification are the most appropriate locations for significant levels of housing and other growth over the plan period, with 55% of the Council's housing need to be accommodated there (circa 3,400 new homes, circa 227 per year).
- 5.13. Policy 7 of the Local Plan states that in “*order to increase the supply of new homes in a region already as built-up as London, the intensification of existing residential areas provides a potential source of new homes*”³¹. Therefore, high density development, on a brownfield site, would deliver a sustainable form of development for Sutton.

³¹ Sutton Local Plan, Paragraph 7.1.

- 5.14. At the regional level, London Plan Policy H1 highlights the pressing need for more homes in London and states that local planning authorities should seek to achieve and exceed the relevant minimum borough annual average housing target.
- 5.15. The Policy states that *“To ensure 10-year housing targets are achieved, boroughs should... optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans and planning decisions, especially the following sources of capacity: Sites with existing or planned public transport access levels (PTALs) 3-6 or which are located within 800m distance of a station or town centre boundary”*.
- 5.16. Furthermore, optimisation of this site will deliver the objectives of London Plan Policy GG2 which seeks to *“...create successful mixed-use places that make the best use of land...enable the development of brownfield land... within and on the edge of town centres, prioritise sites which are well context by existing or planning public transport ...and proactively explore the potential to intensify the use of land...to support additional homes... promoting higher density particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling”*.
- 5.17. Policy SD7 of the London Plan encourages a town centre first approach, which this proposal would follow, concentrating development within Sutton Town Centre. Further, Policy D1B of the London Plan states that residential density should be optimised with regards to connectivity and accessibility by walking, cycling and existing and planning public transport and the capacity and quality of surrounding infrastructure.
- 5.18. Sutton Town Centre is identified as an Opportunity Area, which the supporting text to London Plan Policy SD1 describes as *“significant locations with development capacity to accommodate new housing, commercial development and infrastructure (of all types), linked to existing or potential improvements in public transport connectivity and capacity. Opportunity Areas typically contain capacity for at least 5,000 net additional jobs or 2,500 net additional homes or a combination of the two”*. In fact, Sutton Town Centre Opportunity Area is identified as having the capacity to deliver an additional 5000 new homes over the next 20 years.
- 5.19. The proposed 70 residential units would make a valuable contribution to the Boroughs housing need, prioritising sustainable forms of development and optimising site capacity given the shortage of available land for homes within Sutton, as supported by both local and regional policy.

6. Affordable Housing

- 6.1. The Applicant understands the importance of affordable housing delivery, noting both Local Plan Policy 8, London Plan Policy H4 and H6, and does intend to maximise delivery as far as viably possible.
- 6.2. Given the current challenging economic environment within Sutton, and the reduction in mass, the proposal includes 15% affordable housing by habitable room (30% of which as London Living Rent, and 70% as Discount Market Rent. The accompanying Financial Viability Assessment, by James Brown, evidences that this is beyond the maximum viable amount that could be provided.
- 6.3. In terms of the affordability of the units, the table below sets out the average rent levels by Market Rent, London Living Rent and Discount Market Rent.

| Unit Size | Av. Expected Market Rent | London Living Rent | Discount Market Rent ³² |
|-----------|--------------------------|--------------------|------------------------------------|
| 1-bed | £1,580 | £1,087 | £1,264 |
| 2-bed | £1,825 | £1,207 | £1,460 |
| 3-bed | £2,170 | £1,328 | £1,736 |

- 6.4. The London Plan provides a definition of what constitutes genuinely affordable homes. The support text of Policy H6 sets out that intermediate rented products such as London Living Rent and Discounted Market Rent should be affordable to households on incomes of up to £60,000, and to be considered affordable, housing costs should be no greater than 40% of net household income³³. Based on the definition provided by the GLA, genuinely affordable rent for a single-income household is considered to be up to £1,462 per month³⁴.
- 6.5. Based on the above table, the proposed 1 and 2 bedroom units, in Discount Market Rent tenure, would be defined as genuinely affordable for single/double/triple-income households. It is noted that the 3-bedroom units, in Discount Market Rent tenure, would be affordable for triple-income households only however this suits the intended BTR product in which these units would be expected to be occupied by three sharers predominantly. Notwithstanding, a LLR 3-bedroom unit is proposed, affordable for single-income households.
- 6.6. Therefore, the proposed affordable housing would be truly affordable for local Sutton residents. More information can be found within the accompanying Affordable Housing Statement.

³² 80% of market rent

³³ London Plan Policy H6, Paragraph 4.6.8 – 4.6.9

³⁴ Based on 40% of a take home salary of £43,850

7. High Quality Homes for Sutton Town Centre

7.1. The design team has sought to ensure that where possible all housing units will be in accordance with the design standards laid out in the Local Plan, the London Plan, and the GLA Housing SPG, and GLA Housing Design Standards LPG.

Internal Layouts

7.2. The development would provide adequately sized rooms and apartments with comfortable and functional layouts that are fit for purpose.

- All residential units would exceed the minimum space standards set out in London Plan Table 3.1.
- Floor-to-ceiling heights would be at least 2.5m, in accordance with London Plan Policy D6.
- Bedroom sizes would accord with the standards stated in London Plan Policy D6.

7.3. The proposed units would meet or exceed nationally described space standards required by the Mayor's Housing SPG, the Nationally Described Space Standards, Policy 9 of the Local Plan and Policy D6 of the London Plan.

7.4. Each floor (which are served by two cores) would contain no more than 8 units, and the proposed massing has maximised the proportion of units that would be dual aspect units. All three-bedroom units would be dual-aspect.

7.5. In terms of daylight & sunlight, the proposed massing strategy has been developed to ensure that all residential units would receive adequate sunlight & daylight levels.

Accessibility

7.6. The proposal would deliver 10% (7 units) of dwellings as wheelchair user dwellings' (M4(3) of the Building Regulations) with the remainder being 'wheelchair accessible or adaptable dwellings' (M4(2) of the Buildings Regulations). These can be seen on the proposed floorplans, and would be supported by Policy 9 of the Local Plan and Policy D5 of the London Plan.

7.7. The proposed scheme would provide two lifts and two stairwells. These would ensure safe mobility and access in daily life, and in the event of an emergency.

Natural Light

- 7.8. A Daylight & Sunlight Assessment was undertaken to assess the proposed residential units' access to natural light. The assessment concluded that the proposal's daylighting for residential units is considered acceptable overall.
- 7.9. With this, future residents would be able to enjoy good levels of natural sunlight and amenity.

Private and Communal Amenity Space

- 7.10. Private amenity space would be provided via balconies in each residential unit.
- 7.11. Policy 9 of the Local Plan states that for private amenity space, the Council has a minimum standard of 25m² for flats or one-bedroom units, 40m² for two-bedroom units and 70m² for three bedroom units. However, the Policy states that in some cases, particularly in Areas of Potential Intensification, this minimum standard may be considered too onerous. Therefore, it is considered more appropriate to use the council's Urban Design Guide SPD or any successor document as a guide, rather than minimum standards, taking into account the town centre context.
- 7.12. The GLA Housing SPG Standard 26 and 27 state that a minimum of 5m² of private outdoor space should be provided for double-occupancy dwellings with an extra 1m² for each additional occupant. Given that the site is within the Area of Potential Intensification, and the GLA's SPG Standards supersede the standards set out by LB Sutton, the proposal would provide private outdoor amenity space at or above these standards.
- 7.13. 74m² of outdoor communal amenity space is proposed on the 5th floor roof terrace, providing a high-quality and safe amenity space, connected to an internal community room. This figure is not factored into the total area of playspace because it is considered amenity space for adults. The internal communal room would be 31.8m². 78m² of outdoor communal amenity space is also proposed within the public realm at ground level, though this would be designed as playable space.

Play Space

- 7.14. Utilising the GLA Population Yield Calculator, there would be an expectation for up to 14.7 child occupants within the development, split as follows:
- 0-4 years – 8.0
 - 5-11 years – 5.2
 - 12-15 years – 1.0
 - 16-17 years – 0.5

- 7.15. This derives a total requirement for 147m² of playspace.
- 7.16. A total of 244.25m² would be delivered via both ground floor play and roof-top play within the communal amenity space, accommodating 78m² of child playspace on the ground level and 166.25m² of the roof-top, providing high-quality, safe and stimulating play areas. This provision of playspace exceeds the GLA's requirements by 97.25m². A breakdown of the play areas, based of age, is found on page 68 of the Design and Access Statement.
- 7.17. Policy 9 of the Local Plan outlines that the Council will “*not grant planning permission for new major residential development, including conversions, which does not provide an adequate amount of play space and informal recreation space on site*”³⁵. Furthermore, London Plan Policy S4 states that at least 10m² of play space should be provided per child, delivering safe and stimulating play.
- 7.18. The proposed play space would therefore satisfy both Local Plan Policy 9 and London Plan Policy S4, delivering a high-quality space for child occupiers of the site as well as providing a retrospective benefit to some of the existing residents within the building.

³⁵ Sutton Local Plan Policy D9 part G

8. Place Shaping Through Design & Massing

- 8.1. It has been well established in this Statement that the site can be optimised in order to make best use of the land available in this highly sustainable location. One way to optimise is to add height and better utilise airspace, which also has added benefits in this location of supporting town centre viability, contributing to sustainability goals and place-making.
- 8.2. The site is in a Town Centre, on a main arterial route, with an excellent PTAL of 6a. It is also within the Area of Taller Buildings Potential designated within the Local Plan. The location, therefore, is wholly appropriate for additional height.
- 8.3. The Site Allocation indicates 4 storeys however the supporting text to Policy 40 explains 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”*. In this case, the site does sit within the Area of Taller Building Potential³⁶ and Area of Potential Intensification, as well as offering a very sustainable location for site optimisation. The site has therefore been broadly classified as an area that is suitable for intensification for housing development, and the additional overlap of being located with the Area of Tall Building Potential further emphasises that the density of the site should be maximised. It is also noteworthy that the site allocation for 4-storeys stems from the 2016 Masterplan and Capacity Study, which limited its suggested height to four storeys simply as a result of the adjacency of the Conservation Area and listed Baptist Church. This was without the benefit of a full townscape and heritage analysis of the site and its potential, which is now carried out as part of this proposal.
- 8.4. Policy 1 of the Local Plan states that in order to achieve housing targets, the Council will *“promote the redevelopment of Sutton Town Centre including with 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”*.
- 8.5. Such an approach is further supported by the NPPF, which promotes the development of under-utilised buildings in sustainable locations by airspace development. Paragraph 120, part E supports *“opportunities to use the airspace above existing residential and commercial premises for new homes. In particular, they should allow upward extensions where the development would be consistent with the prevailing height and form of neighbouring properties and the overall street scene, is well designed*

³⁶ Local Plan Appendix Map 7.1 which shows Areas of Taller Building Potential identifies the Site within the 'tall' category which is 7-10 storeys

(including complying with any local design policies and standards), and can maintain safe access and egress for occupiers”.

- 8.6. Local Plan Policy 28 outlines that tall buildings should be of exemplar design, make a positive contribution to the quality of, and integrate visually with, the local and wider townscape including with active frontages, include a mix of uses and protect the amenity of prospective occupants and existing adjoining occupants. The proposal would therefore support the ambitions of Policy 28.
- 8.7. The Town Centre Masterplan sets out that Sutton Town Centre has the potential to see significant change until 2023, outlining that proposed taller buildings in the town centre would give rise to an emerging cluster of taller buildings in the most accessible part of the centre. The Masterplan outlines that in addition to making very efficient use of land in the most sustainable location in the borough, a planned cluster of high-quality taller buildings in this location would help to signify the important commercial role of this part of Sutton, and assist wayfinding and legibility for those visiting the town.
- 8.8. Furthermore, the London Plan Policy D1 emphasises this, stating that *“change is a fundamental characteristic of London, respecting the character and accommodating change should not be seen as mutually exclusive. Understanding of the character of a place should not seek to preserve things in a static way but should ensure an appropriate balance is struck between existing fabric and any proposed change”*. The proposal would therefore positively contribute to sustainable place-making for Sutton.
- 8.9. Sutton is identified as an Opportunity Area within the London Plan and therefore Policy SD1 of the London Plan is relevant. This explains that Opportunity Areas are identified as significant locations with development capacity to accommodate new housing, commercial development and infrastructure (of all types), linked to existing or potential improvements in public transport connectivity and capacity. Maximising the sites development potential is therefore essential to the delivery of this Policy.
- 8.10. The proposal would follow a Design-led Approach, as encouraged in Policy D3 of the London Plan. High-density development is promoted in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling. Further, Policy D2 of the London Plan outlines that density of development should be proportionate to the site’s connectivity and accessibility by walking, cycling, and public transport to jobs and services providing further justification for appropriate density on this site. Consequently, the PTAL 6a, and proximity to town centre amenities provides justification for increased density on this site.
- 8.11. The policies noted above provide significant support for the proposals here. The proposal would optimise a currently underutilised site in the Sutton Metropolitan Centre, which is undergoing large-scale changes to provide new housing, and the proposal would accord well with nearby completed and consented schemes.
- 8.12. The proposal would ensure that efficiency of land in right locations is optimised, thereby delivering the objectives of the Council and the GLA to accommodate growth within sustainable locations.

Tall Building Assessment

- 8.13. The accompanying Design & Access Statement explains how the proposal would be formed of two massing components, at 5 and 13 storeys. Based on the Local Plan definition, the proposal would be classed as a very tall building, which are those that are “*excessively taller than the surrounding built form and will be from 11 storeys upwards*”. Although the proposal is not ‘excessively taller’ than surrounding built form and indeed would be the same height as the adjoining building at 6 Sutton Park Road, it is nonetheless more than 11 storeys.
- 8.14. Since the proposal would classify as a tall building, an assessment has been provided of the proposal against Policy 28 of the Local Plan, and Policy D9 of the London Plan, set out within the table below.

| London Plan Policy D9 Requirement | Scheme Response |
|---|---|
| Visual Impacts. | <p>The building responds well to local character and scale and is designed to positively contribute to the existing and emerging skyline as well as the local townscape and immediate views.</p> <p>The HTVIA concludes that the proposal would have a “<i>limited impact on key views.</i>”³⁷</p> |
| Spatial hierarchy of the local and wider context, and aid legibility and wayfinding. | <p>The development would signify and support wayfinding to Sutton Town Centre, and to itself given the employment offering. It will mark an important corner within the town centre.</p> |
| Architectural quality and materiality of an exemplary standard. | <p>Durable and climate resilient brick would be used for the façades, ensuring longevity to the building materials, which can be reclaimed and re-purposed at end of life.</p> <p>The proposed brick would honour the neighbouring church and would be an enhancement to the site overall.</p> |
| Should take into account and avoid harm to the significance of London’s Heritage assets and their settings. | <p>In relation to the Baptist Church, while there will be an inevitable impact on the setting of the Grade II* listed building, this is considered to be minimised by the stepped height, the green buffer and use of similar materials.</p> <p>The proposal’s “<i>design skilfully integrates subtle references to the church’s geometry, emphasising a sense of verticality, which is a key component of Cachemaille-Day’s work. To enhance visual appeal and respond to the context of the Site, a carefully curated brick material palette has been chosen, featuring</i></p> |

³⁷ Heritage, Townscape & Visual Impact Assessment, Icen, paragraph 8.6

| | |
|--|--|
| | <i>varying tonal bricks that artfully distinguish between the two blocks, adding a nuanced and refined touch to the overall architectural composition.</i> ³⁸ |
| Buildings in the setting of a World Heritage Site must preserve and not harm the Outstanding Universal Value of the World Heritage Site. | The site is not in the setting of a World Heritage Site. |
| Buildings near the River Thames, particularly in the Thames Policy Area, should protect and enhance the open quality of the river. | The site is not in the Thames Policy Area. |
| The building should not cause adverse glare. | The proposed material palette has been carefully considered and excess glazing has been avoided whilst ensuring good internal daylight quality. |
| Buildings should be designed to minimise light pollution from internal and external lighting | A sensible wall/glazing ratio is proposed to minimise light pollution from internal sources. The scheme for the external lighting has not been produced, however one will be developed in due course, mindful of this policy expectation. |
| The building's materials and its emergency exit routes must ensure the safety of all occupants. | The design has been developed in conjunction with Cundall's fire engineer to guarantee safety in such events. ³⁹ |
| Buildings should be serviced, maintained and managed in a manner that will preserve their safety and quality, and not cause disturbance or inconvenience to surrounding public realm | The refuse store and cycle parking for the scheme will be accommodated within the building footprint, preventing inconvenience to the surrounding public realm. The proposed blue-badge car parking spaces would also be accommodated within the site's footprint. The building would receive deliveries and servicing within the site boundary. <i>As a result, the proposal would "would reduce delivery activity on the service yard, thereby improving servicing arrangements and safety for the existing Morrisons."</i> ⁴⁰ |
| Entrances, access routes, and ground floor uses should be designed and placed to allow for peak time use. | The scheme would deliver generous and multiple entrance points for the sites. Each use has a separate entrance. |
| It must be demonstrated that the capacity of the area and its transport network is capable of accommodating the quantum of development. | The site is within a highly sustainable location, with PTAL 6a, and located within Sutton Town Centre, and therefore there are existing services and facilities that are proximate to the scheme. |

³⁸ Heritage, Townscape & Visual Impact Assessment, Iceni, paragraph 6.12

³⁹ Fire Strategy Report, Cundall, Chapters 4 and 5

⁴⁰ Delivery and Servicing Management Plan, RGP, paragraph 5.3.4

| | |
|--|---|
| | The Transport Statement associated with this application quantifies the services and facilities within the surrounding area in Figure 2 of Chapter 3. |
| Jobs, services, facilities and economic activity that will be provided by the development and the regeneration potential this might provide should inform the design so it maximises the benefits these could bring to the area, and maximises the role of the development as a catalyst for further change in the area. | The scheme includes 191m ² NIA of high-quality office space that will deliver jobs and create indirect benefits for the wider town centre. A Skills and Employment Strategy is submitted with the application to support the proposal. |
| Buildings, including their construction, should not interfere with aviation, navigation or telecommunication, and should avoid a significant detrimental effect on solar energy generation on adjoining buildings. | At a maximum height of 13 storeys, the scheme is not at risk at creating any negative interference. |
| Wind, daylight, sunlight penetration and temperature conditions around the building(s) and neighbourhood must be carefully considered and not compromise comfort and the enjoyment of open spaces, including water spaces, around the building. | An Overheating Assessment, Daylight Sunlight Assessment, Microclimate Assessment, Air Quality Assessment, and Noise Impact Assessment were conducted to assess the existing amenity of the surrounding area and propose mitigation measures to ensure amenity would not be compromised by the development. |
| Air movement affected by the building(s) should support the effective dispersion of pollutants, but not adversely affect street-level conditions. | The proposed scheme, with its inclusion of open spaces, should not result in any canyon effect. This is confirmed by the Microclimate Assessment. |
| Noise created by air movements around the building(s), servicing machinery, or building uses, should not detract from the comfort and enjoyment of open spaces around the building. | A Noise Impact Assessment was completed by Aval. Having collected the background noise levels of the site, mitigation measures for the construction and occupation of the proposal are outlined in Chapter 6 of the report. The assessment concludes that the scheme would not conflict with any national regional, or local noise policy. |
| The cumulative visual, functional and environmental impacts of proposed, consented and planned tall buildings in an area must be considered when assessing tall building proposals and when developing plans for an area. | These factors were considered and assessed in multiple reports, namely the HTVIA, DAS, Microclimate Assessment and other environmental reports. The cumulative impact of the scheme would be low, on the basis that individually these impacts considered above are minimal and remain minimal once these are aggregated. |

| Local Plan Policy 28 Requirements | Scheme Response |
|---|--|
| Is attractive, designed to the highest standard, especially with regard to architectural detailing, and uses high-quality materials. | The HTVIA describes the proposal as “high-quality architecture” ⁴¹ . The brick material palette was carefully chosen and features varying tonal bricks that artfully distinguish between the two blocks, which also adds a nuanced, refined touch to the overall architectural composition. |
| Respects the local context and responds to local character and heritage assets. | As explained in the HTVIA and Design and Access Statement, the proposed scheme would have a low level of less than substantial harm to Sutton Baptist Church and “offer a genuine enhancement to the existing scenario and would enhance the street presence of the church”. ⁴² |
| Is of a suitable scale, massing and height to the setting of the site and/or townscape. | The “base principles of height, scale and massing have been established and accepted in local policy as well as by HE and DRP through the pre-application process, in line with Section 12 of the NPPF on good design.” ⁴³ |
| Seeks to improve an area of poor character. | The HTVIA classifies the townscape character value of Sutton Town Centre’s as Medium-High, the Interstitial Zone’s as Low, the Suburban Residential Hinterland as Medium, and the Post-War Estates as Low. The Assessment finds the proposal would benefit all four of the above Townscape Character Areas and would represent positive change in the area. ⁴⁴ |
| Makes a positive contribution to the street frontage, street scene and / or public realm, such as using railings and low walls where practicable. | The proposal seeks to allow for potential future connections and the realisation of the broader masterplan in Sutton. ⁴⁵ The proposal would strengthen the connections between the three listed churches and enhance public routes and spaces. The existing landscape frontage to the site will be retained and new landscaping provided to supplement the existing. |
| Is inclusive and accessible for all and improves movement through areas with direct, accessible and easily recognisable routes. | As described in the accompanying Transport Assessment, this would be achieved. |
| Is secure and designed to minimise crime and anti-social behaviour. | This would be achieved, including via coordination with the local DOCO. |

⁴¹ Heritage, Townscape & Visual Impact Assessment, Icen, paragraph 8.4

⁴² Heritage, Townscape & Visual Impact Assessment, Icen, paragraph 8.8

⁴³ Heritage, Townscape & Visual Impact Assessment, Icen, paragraph 8.8

⁴⁴ Heritage, Townscape & Visual Impact Assessment, Icen, page 28

⁴⁵ Design and Access Statement, Wimhurst Pelleriti, page 44

| | |
|--|--|
| Is robust and flexible in use. | The office space at ground floor could be repurposed in due course if required. |
| Responds to natural features and retains trees, hedges and other landscape features and spaces of amenity value, where possible. | <p>The proposal would aim to retain the existing tree canopy as far as possible, and significant planting is proposed which would provide an uplift in tree canopy for the site.</p> <p>From a landscaping perspective, the existing site will be greatly improved through the provision of trees, hedges, shrub beds, animal habitats, and a green buffer. Through the removal of the car park and the provision of these landscaping plans, the amenity value of the landscaping will greatly improve.</p> <p>From an environmental perspective, Biodiversity Net Gain Assessment finds that the proposal would achieve a 10.86% improvement in BNG and achieves a 0.41 Urban Greening Factor score.</p> |
| Is not dominated by car and cycle parking. | Commensurate with its town centre location, car parking is limited to the required 'blue badge' provision. Two 'blue-badge' spaces will be provided. Bicycle parking is in accordance with the relevant Sutton and GLA standards. |
| Creates attractive, functional and clearly defined public and private space. | <p>The proposal includes attractive and functional private and communal amenity space.</p> <p>Each unit has its own private balcony. Adult amenity and playspace would be located on the roof and at ground level to deliver a balance of uses that benefit all residents. Seating on the roof will also enable neighbours to meet, helping build a sense of community.</p> <p>The public space will be clearly defined by relocating the pedestrian paths further into the site, thereby creating a landscape buffer screening the traffic from view.</p> |
| Protects any important local views and creates new ones wherever possible. | <p>Following the Visual Impact Assessment, it was concluded that the proposal "<i>would not lead to a loss of historic fabric, nor diminish the church's contribution to Sutton's ecclesiastical quarter, nor impact its form and hierarchy within the streetscape.</i>"⁴⁶</p> <p>The HTVIA concluded the proposal would only have a "<i>limited impact on key views.</i>"⁴⁷</p> |

⁴⁶ Heritage, Townscape & Visual Impact Assessment, Icen, paragraph 8.6

⁴⁷ Heritage, Townscape & Visual Impact Assessment, Icen, paragraph 8.6

| | |
|--|--|
| Carefully integrates building services equipment and, in industrial areas, operating equipment. | This will be further developed as the design progresses. |
| Maintains the setting and visual amenity of the Green Belt, Metropolitan Open Land, Public Open Space and Urban Green Space. | Not applicable. |

9. Other Planning Considerations

Energy & Sustainability

- 9.1. The proposal has placed sustainable development at the heart of the design approach, ensuring the proposal would reduce present and future carbon emissions for LB Sutton.
- 9.2. The proposal would have a low embodied carbon strategy as a key principle. A basement has been avoided, grid spacing is optimised to reduce material, low carbon framing solutions are being considered and heat pumps with low Global Warming Potential (GWP) refrigerants will be specified.
- 9.3. The proposal would minimise operational energy of the proposal with a fabric first approach involving a centralised heat pump system supplying the whole building with space heating and hot water, with a connection point to a future heat network, supplied by rooftop PV array. The GLA target will be exceeded with the residential performance expected to achieve >50% below Part L (2021). Zero carbon will be achieved by the offset of the remaining emissions.
- 9.4. Circular economy principles have also been used to inform design decisions such as a targeted cut fill balance, utilising existing services as far as possible, deploying long life loose fit design approaches to maximise future flexibility and selection of durable and timeless material. Furthermore, opportunities for reuse of elements of the existing building would be considered as part of the pre-demolition audit process.
- 9.5. In terms of overheating, the TM59 standard will be achieved when windows are fully open and for areas where window openings are closed at night (to reduce local acoustic emissions) supplementary mechanical ventilation will be supplied. All 70 residential dwellings would have natural ventilation, but due to acoustic restriction supplementary cooling can be used for bedrooms at night. None of the units would be heated by direct-electric, but all of the units would be heated using electric air source heat pumps.
- 9.6. The proposal would also deliver 290m² of Green Roof.
- 9.7. The Urban Greening Factor for the proposed scheme would be 0.41, which would surpass the London Plan's standard.
- 9.8. As outlined in Local Plan Policy 31, the proposal would achieve the highest standards of energy efficient design, and would be future proofed to ensure its longevity and help reduce carbon emissions for Sutton.
- 9.9. The Design Team will ensure that the proposal is of the highest environmental standards and will continue to prioritise this as the scheme develops further.

Drainage and Flood Risk

- 9.10. A Flood Risk Assessment and Sustainable Drainage Strategy Report were conducted to assess the potential effects of the proposed development.
- 9.11. The Flood Risk Assessment found that the site would be suitable for the construction of the proposed scheme.
- 9.12. The proposed drainage strategy would have a positive impact and would benefit the site. In a 1 in 100 year storm event, the peak rainwater discharge to the sewer would be significantly reduced, by 97.2%, when compared to the existing unmitigated design. It would also have a 91.2% reduction in a typical, annual storm event.
- 9.13. This would be achieved through the inclusion of an attenuation tank, as well as permeable paving and infiltration (if deemed suitable following infiltration testing).
- 9.14. The proposed drainage strategy would meet the requirements set out by Building Regulations Part H, the London Borough of Sutton's SFRA, the London Plan, and the CIRIA SuDS manual.

Air Quality

- 9.15. An Air Quality Assessment was undertaken to consider impacts from 'disamenity' (or 'nuisance') dust associated with annoyance.
- 9.16. The risks of construction activities in relation to dust soiling were deemed 'High Risk', and all risks to human health were deemed 'Low Risk'. The Air Quality Assessment explains how this risk will be mitigated in Appendix D of the report.
- 9.17. A mechanical ventilation system is proposed as part of the design due to noise and energy constraints. In order to ensure that future occupants have air of adequate quality is recommended that a NOx filter is installed within the system. This can be successfully addressed and managed at a later stage.
- 9.18. The Air Quality Assessment concluded that the proposed development would not conflict with any national, regional, or local planning policy in relation to construction and operation phase dust and air quality nuisance.

Transport and Highways

- 9.19. Given the site's PTAL 6a, the proposal would be car-free, with the exception of two blue-badge parking spaces, which is strongly encouraged by the Mayor in London Plan Policy T6 and Local Plan Policy 37.
- 9.20. The blue-badge parking spaces would be equipped with a shared active charging point, in accordance with Policy T6.1 of the London Plan.

- 9.21. The proposal would also provide 138 cycle parking spaces at the ground floor, which would be in accordance with Policy 37 of the Local Plan and London Plan Policy T5. The types of proposed cycle parking are presented in the table below.

| Long Stay | Total: 134 |
|-------------------|---------------------|
| Space Type | No. Proposed |
| Adaptive | 7 |
| Sheffield Stands | 20 |
| Two Tier Stands | 108 |
| Short Stay | Total: 4 |
| Space Type | No. Proposed |
| Sheffield Stands | 4 |

- 9.22. A dedicated delivery bay would be provided on site. This would allow all commercial and residential delivery and servicing to occur on-site. As a result, the proposed scheme would not have a negative impact on street congestion, thus providing traffic benefits to the surrounding areas.
- 9.23. As part of the application, the proposal will assess its impact on the highway and public transport network and will ensure that any adverse impact is minimised.

Waste and Refuse

- 9.24. Designated waste and refuse facilities will be provided on site for the commercial and residential units. These facilities will be located on the ground floor.

| Type of Waste | Capacity Required (l) | No. of 1,100l bins proposed | No. of 360l bins proposed |
|----------------------|------------------------------|------------------------------------|----------------------------------|
| Residential Waste | 4,564 | 5 | 0 |
| Dry Mixed Recycling | 3,423 | 4 | 0 |
| Paper and Card | 2,282 | 3 | 0 |
| Food Waste | 1,141 | 0 | 4 |

- 9.25. The proposed waste facilities are compliant with the Kingston and Sutton Waste Technical Planning Guidance (April 2021).
- 9.26. A more complete presentation of the refuse provision, including the location of the refuse and collection route, can be found on page 83 of the Design and Access Statement and within the Delivery and Servicing Plan.

Wind

- 9.27. A Wind Microclimate Report was completed to assess the wind microclimate of the proposed scheme using computational modelling to predict the strength of wind speeds that would occur following the introduction of the proposed development.

9.28. The report concluded that wind conditions would remain safe and comfortable for intended uses, both on the ground within and around the Site, as well as at the amenity spaces on the fifth floor terraces.

10. Conclusion

- 10.1. This Planning Statement has been prepared by Centro Planning Consultancy on behalf of Macar Living (City House) Ltd, the Applicant, in support of its planning application for the comprehensive redevelopment of City House, Sutton in the London Borough of Sutton.
- 10.2. The proposed development comprises comprehensive redevelopment, delivering a part 5-storey and part 13-storey building, to provide 70 'Build to Rent' residential apartments (Class C3), 191m² NIA of office space (Class E(g)(i)) and associated landscape and public realm improvements.
- 10.3. The proposal would deliver 70 high quality residential units, making a valuable contribution to the Borough's housing need. Given the site's PTAL 6a and location within Sutton Metropolitan Centre and Sutton Opportunity Area, this represents an excellent opportunity to provide a significant contribution of new homes in a highly sustainable location and re-developing an underutilised brownfield site.
- 10.4. The 191m² of grade A office floorspace, which would offer a significant improvement to the current low-grade office floorspace. This space would be occupied by Macar as its head offices and therefore an end user has been secured.
- 10.5. The proposed design and massing would deliver a very high-quality building, optimising the site's potential given its very highly sustainable location whilst ensuring the proposal is sensitive to the neighbouring Baptist Church. Hence the harm to the setting of the listed Baptist Church, and by association the Conservation Area, would be "*at the lowest level of less-than-substantial-harm*" as confirmed by Icenii at paragraph 6.24 of its accompanying HTVIA. The proposed public realm improvements would offer significant public benefit, of over-riding weight, and would be future proofed so that it can be connected to surrounding public realm improvements.
- 10.6. The proposal would provide an array of benefits to Sutton's physical environment and local community, with the following benefits of particular importance:
 - The creation of 70 new high-quality residential dwellings, of which 15% would be genuinely affordable;
 - Re-provision of 191m² NIA of high-quality office headquarters space;
 - Promotion of sustainable patterns of development on a brownfield site;
 - High quality development that would respect the setting of adjacent and nearby heritage assets and integrate with the local context;
 - Deliver 290m² of Green Roof;

- Deliver 244.25m² of playspace;
- Public realm improvements; and
- The promotion of sustainable and active travel methods through the provision of a car-free development with on-site delivery and servicing.

10.7. In conclusion the proposal is in general accordance with the development plan and planning permission should be granted.

CENTRO

104 St. John Street
London EC1M 4EH

info@centroplan.co.uk
0203 302 1855