

**LONDON BOROUGH OF SUTTON**

**THE EXECUTIVE**

**MONDAY, 16 FEBRUARY 2009**



**7.30 pm at the**

**Civic Offices, St Nicholas Way, Sutton SM1 1EA**

<b>THIRD DISPATCH</b>
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To all members of The Executive:-

*The following papers, which were not available for dispatch with the agenda, are attached. Please bring them with you to the meeting:-*

**6. DEVELOPMENT OF WANDLE VALLEY REGIONAL PARK (Pages 1 - 2)**

Recommendations from the Planning Advisory Group

**7. ANNUAL REVIEW OF THE CONSTITUTION**

Appendices showing details of the recommended changes are attached for Executive Members only

**9. REFERENCE FROM PLANNING ADVISORY GROUP (10/2/09) (Pages 3 - 34)**

Core Planning Strategy Submission Report – results of consultation and proposed changes to the draft document

*Paul Martin*  
Chief Executive  
Civic Offices  
St Nicholas Way  
SUTTON  
SM1 1EA

*13 February 2009*

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Copies of reports are available in large print on request



**London Borough of Sutton****THE EXECUTIVE – 16 FEBRUARY 2009****DEVELOPMENT OF WANDLE VALLEY REGIONAL PARK****RECOMMENDATIONS FROM PLANNING ADVISORY GROUP**

*Extract from the Minutes of the meeting held on 10/2/09*

“Further to Minute 12/08, progress on developing the concept of the Wandle Valley Regional Park was reported. The report also covered possible future working arrangements, and the funding required for managing the Wandle Valley Partnership for a transitional period prior to the establishment of the Park.

The Joint Members’ Working Group, known as ‘Local Authorities along the Wandle’ (LAW), had considered a draft Memorandum of Understanding (MoU), which set out proposed working arrangements between the 4 boroughs and the involvement of the GLA until the Regional Park had been established. The MoU was not intended to be legally binding, but was a statement of agreement to work together in a co-operative manner. Decisions and recommendations would need to be ratified by each of the 4 boroughs’ cabinet committees and all the costs of the work arising from the Group would be shared.

The Joint Members’ Working Group had agreed that a rationalised, more formal organisational structure was now required. This would involve Groundwork London in a project management role, co-ordinating the work of the Joint Members’ Working Group, The Wandle Valley Steering Group and the Wandle Forum, with the Steering Group making recommendations to the Joint Working Group for approval. This would enable the 4 Wandle boroughs to collectively provide the necessary political leadership, acting in an advisory capacity on behalf of the 4 authorities. All stakeholders represented on the Wandle Steering Group and the Wandle Forum would be consulted on decisions on the future development of the Park.

The Joint Working Group had also considered costed options for the co-ordination of the next, transitional phase of the Wandle Valley Regional Park and details of their agreed way forward were reported. It was proposed that each authority should commit £7k in 2009/10 and 2010/11 as their share of the cost of Groundwork London managing the Wandle Valley Partnership over the transitional period.

Members discussed the future funding of the Regional Park and were advised that securing the long-term funding of the Park had been written into the Memorandum of Understanding as a proposed outcome. Funding for the Lee Valley Regional Park was tied up with the 2012 Olympics, so it was acknowledged that the objective of either: (a) repatriating the funds currently paid to the Lee Valley Regional Park; or (b) establishing the Wandle Valley Regional Park as the regional facility for south London, with south London authorities paying a precept towards its upkeep, would be a long-term goal.

**Resolved: To note the report and RECOMMEND The Executive to:**

- (i) agree the draft Memorandum of Understanding, as described in the report;**
- (ii) agree the proposed Wandle Valley Partnership arrangements, involving the Joint Members’ Working Group, Wandle Valley Steering Group, the Wandle Forum and Groundwork London over the transitional period;**

- (iii) **Endorse 'The Wandle Valley Regional Park - A Vision for the Future' as a basis for facilitating the development of the Regional Park over the transitional period;**
- (iv) **Agree the proposed boundaries of the Regional Park in Sutton for purposes of consultation with the Wandle Valley Steering Group, the Wandle Forum and other stakeholders."**

The Executive is **RECOMMENDED** to concur.

**London Borough of Sutton**

**THE EXECUTIVE – 16 FEBRUARY 2009**

**REFERENCES FROM PLANNING ADVISORY GROUP**

**4. CORE PLANNING STRATEGY- REPRESENTATIONS FOLLOWING PUBLICATION & PROPOSED AMENDMENTS TO SUBMISSION**

<b>Ward Location:</b> N/A	<b>Executive Councillor:</b> Lyn Gleeson
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*Extract from the Minutes of the meeting held on 10/2/09*

“Further to Minutes 23/08, 36/08 and 60/08 the Advisory Group considered a summary of the main issues raised by respondents following the publication of the draft Core Planning Strategy (CPS). Members were reminded that, at this stage, the only issues that could be raised by respondents were in relation to the document’s ‘soundness’.

At the time the report had been written, 38 respondents had made 241 representations. Details of these were set out in a summary of responses, together with the officers’ comments and recommendations. 3 of the submissions had been received after the consultation had closed and were, therefore, not duly made. However, the Council could decide to consider these, if it wished, and it was recommended that they should be considered, for completeness.

22 respondents had raised substantive issues in response to the consultation, which would need to be resolved by the Inspector through the Examination process. The main issues raised were in respect of the proposed de-designation of Metropolitan Open Land (MOL), Biodiversity, housing supply, housing density, affordable housing, employment land and town centres.

A supplementary report had been submitted on a further, late representation received in respect of the designation of the former Orchard Hill Hospital and BIBRA sites as ‘Major Developed Sites’, which was on the same grounds as one previously received from Mr Carl Brown. This further representation had been made to, and supported by, the Carshalton & Clockhouse Local Committee. The Advisory Group endorsed the officer’s recommendations that it should be considered, that no change should be made to the Draft Plan in response but it should be submitted to the Planning Inspector for consideration in relation to the forthcoming Examination. Sally Blomfield clarified that this late representation had been made by Mr Liffen as an individual and not on behalf of the Carshalton-on-the-Hill Residents’ Association. Mr Ray Liffen was present at the meeting, and was allowed by the Chair to comment and ask a question.

The GLA had submitted 17 representations, the majority of which related to issues of clarity. However, there were 2 areas where the GLA had indicated that the draft Strategy was not in general conformity with the London Plan. These were the strategic issues of the proposed loss of MOL and consequent impact on Biodiversity. These issues would have to be considered by the Inspector at Examination. The GLA had indicated that it wished to deal with these matters by appearing at the Hearings.

The GoL had said that there did not appear to be any critical soundness issues with the draft Strategy and considered that the Plan was ‘Justified’ and ‘Effective’. They had raised 5 issues in respect of the final test of ‘soundness’, i.e. whether the Plan was consistent with national policy, and identified some points where amendments would improve the understanding or clarity of the Plan.

A number of typographical errors, mapping and other minor changes had been identified which would help with the legibility of the Plan and also address some of the representations. These were set out in a schedule of proposed changes, which was tabled at the meeting. These types of minor changes could be made without consultation. Subject to approval, they would be listed in a schedule to accompany the DPD when it was submitted to the Planning Inspector, with a request that s/he consider recommending the changes as part of their report. It was noted that some additional, minor changes would be required to this schedule, prior to its submission.

5 respondents had indicated that they would wish to attend the Hearings to support their representations that the Plan was not sound, including the GLA. The remaining respondents had either said that their responses could be dealt with by way of written representations or had not indicated how they wished to progress.

**Resolved:** To note the responses received to the consultation on the draft Core planning Strategy – Submission Report and **RECOMMEND** The Executive:

(i) To not make any alterations to the Core Planning Strategy, Proposed Submission in respect of the representations by Mr Liffen regarding Green Belt/Major Developed sites issues;

(ii) To refer the Supplementary Report on the additional representation from Mr Liffen to the Carshalton & Clockhouse Local Committee for their consideration.

(iii) To delegate authority to the Executive Head of Planning, Transport & Highways, in consultation with the Chair of the Planning Advisory Group, to make any further minor amendments to the draft Strategy prior to its submission to full Council for approval;

(iv) To **RECOMMEND** full Council:

- a. To refer the four representations that were not duly made within the consultation period to the Planning Inspector for consideration as part of the forthcoming Examination;
- b. To approve the draft Core Planning Strategy and Schedule of Minor Changes for submission;

The report of Executive Head of Planning, Transport & Highways, Supplementary report and the draft Schedule of Minor Changes referred to are attached as (ENCLOSURES)

The Schedule of comments received is available in the Members' Room and is also viewable on line.

The Executive is <b>RECOMMENDED</b> to concur
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**London Borough of Sutton  
Planning Advisory Group – 10 February 2009**

**Report of the Executive Head of Planning and Transportation  
CORE PLANNING STRATEGY – REPRESENTATIONS FOLLOWING  
PUBLICATION & PROPOSED AMENDMENTS TO THE PROPOSED  
SUBMISSION**

**Ward Location:** All wards  
**Area Served:** All wards

**Author:** Sally Blomfield (x6253)  
**Lead Councillor:** Lyn Gleeson

### **Key Decision Report**

#### **Summary**

This Report summarises the main issues raised by respondents following the publication of the Core Planning Strategy – Proposed Submission (the draft Strategy). A schedule of all the representations is attached, and a schedule of minor changes, which would help with the legibility of the Plan and address some of the representations, has been prepared and will be presented at the meeting.

#### **Recommendations**

I recommend that **the Planning Advisory Group:**

- (a) Agrees that the three representations, which were not duly made, be considered and to forward its recommendation to The Executive for consideration and approval and for submission to The Council at its meeting on 2 March 2009, recommending approval;
- (b) Considers all the representations received and considers and comments on the proposed schedule of minor changes and agrees to forward its recommendations to The Executive for consideration and approval and for submission to The Council, recommending approval; and
- (c) Recommends to The Executive for submission to The Council, recommending that authority be delegated to the Executive Head of Planning and Transportation to make, in consultation with the Chair of the Planning Advisory Group, any further minor alterations to the draft Strategy to be submitted to the Inspector prior to the Examination.

### **1. Background**

- 1.1 The Planning and Compulsory Purchase Act 2004 requires local planning authorities to produce a Local Development Framework (LDF) guiding change over the next 10 to 15 years. The draft Strategy is the most significant document in that it sets out the key elements of the local planning framework for Sutton, and all other planning documents must be in conformity with the adopted Strategy.
- 1.2 Consultation on the Issues and Options stage of the draft Strategy took place in September/November 2006, and consultation on the Preferred Options document took place in January and February 2008.
- 1.3 Recent changes to the statutory procedures for preparing LDFs require the separation of publication of the revised Strategy and submission to the Secretary of State. The publication of the Proposed Submission document is the third stage in the preparation of the Core Planning Strategy. The publication and formal representation period ran between 12 November 08 to 7 January 2009.

- 1.4 At the same time as publication the Council made a formal request to the Mayor regarding the general conformity of the Core Planning Strategy to the London Plan.
- 1.5 Revised PPS12 is clear that the publication of a DPD should not be considered as an additional requirement to undertake public consultation, but allows representations relating to issues of soundness to be made and taken into account at Examination. Consequently, as there was little or no scope for changes to the submission document prior to Examination, the Council considered that interactive consultation techniques were not appropriate and therefore carried out the minimum publication requirements in accordance with the Council's adopted Statement of Community Involvement. This included writing to consultees and making documents available for inspection at a range of locations.
- 1.6 To be sound a Core Strategy must be justified (founded on a credible evidence base and the most appropriate strategy when considered against the reasonable alternatives), effective (the document must be deliverable, flexible and able to be monitored) and consistent with national policy. A standard representation form was produced and sent to all general and specific consultees and posted on the web in order to encourage respondents to frame their responses against these tests of soundness.

## **2. General Conformity with the London Plan**

- 2.1 In accordance with the requirements of the Planning and Compulsory Purchase Act the Council was required to request the Mayor's opinion on general conformity with the London Plan. One of the Tests of Soundness is that any DPD must be in general conformity. The GLA indicates that the proposed Core Planning Strategy is, on the whole, consistent with the London Plan however, in relation to the strategic issues of Proposed Loss of Metropolitan Open Land (MOL) and Biodiversity the Core Planning Strategy is not in general conformity. These issues will have to be considered by the Inspector at Examination and the GLA has indicated that it wished to deal with these matters by appearing at the Hearings.
- 2.2 In total the GLA has submitted 17 representations, the majority of which relate to issues of clarity.

## **3. Response from the Government Office for London**

- 3.1 GoL does not consider there to be any critical soundness issues with the Core Planning Strategy: Proposed Submission draft, but has identified some points where amendments would improve the understanding or clarity of the Plan. Overall GoL considers the Plan to present a spatial portrait of Sutton, which gives the document a locally distinctive dimension.
- 3.2 GoL's remaining comments are framed around the Tests of Soundness. GoL considers the Plan is 'Justified'. It is considered that the Council has prepared a credible evidence base to support the Plan and that the Council has prepared a clear audit trail of how the document has been shaped following presentation of issues and options and preferred options. GoL therefore considers that the document is the most appropriate having gone through an objective process of assessing alternatives.
- 3.3 GoL considers the Plan to be 'Effective'. The Infrastructure Schedule (Appendix 4 of the CPS) has provided useful information on deliverability however this could be enhanced with further cross-referencing of specific projects in the text of the Core Planning Strategy. GoL has indicated that it is now satisfied that the Council has addressed concerns regarding the deliverability of Tramlink with reference in the Core Planning Strategy to the long term and uncertain nature of this project whilst

wishing to ensure that any future route is safeguarded. The Plan is considered to be flexible as housing growth has been tested exhaustively and three alternative scenarios have been presented in the event of unusual circumstances. Indicators and targets in Appendix 5 of the CPS ensure that the Plan can be monitored.

- 3.4 GoL has raised five issues in respect of the final test of soundness, whether the Plan is consistent with national policy. These are listed in Appendix 1.
- 3.5 GoL has indicated that its representations can be considered by written representation.

#### **4. Main Issues Raised in Response to Publication**

- 4.1 There are 38 respondents (Appendix 2), however one respondent's representation does not relate to the LDF at all. Three submissions (by Carl Brown, Natural England and Mitcham Commons Conservators) were submitted after the close of consultation and therefore were not duly made. It is at the discretion of the Council whether to consider these and I would recommend that they be so. In total, there were 241 representations (Appendix 3), of which 96 supported the policies/found them to be sound.
- 4.3 Seven respondents have only submitted representations of support i.e. they consider the Plan/particular Policies to be sound, or do not wish to make any particular comments. These include The Royal Marsden NHS Foundation Trust; The Institute of Cancer Research; Surrey County Council; WM Morrison Supermarkets Plc; the Coal Authority; London Remade; and the Theatres Trust.
- 4.4 Five respondents have submitted representations which in their entirety may be resolved through negotiation of proposed minor amendments of clarification to the draft Strategy: London Borough of Merton; the National Grid; the Metropolitan Police Authority; Friends, Families and Travellers; and English Heritage.
- 4.5 Members should be aware that in view of English Heritage's initial intention to challenge the Core Planning Strategy on soundness grounds, a meeting was held with English Heritage's Regional Planning Advisor in January 2009 in order to resolve each of the issues outlined in their letter of 7 January 2009 and to agree a way forward. Arising from these discussions, English Heritage would be prepared not to pursue their challenge through to the Examination, subject to a number of agreed amendments being made to the Sustainability Appraisal (SA) Report. In relation to English Heritage's principal objection that they had not been properly consulted as required in Sutton's Statement of Community Involvement (i.e. the second test of soundness), English Heritage has now accepted that the Council's adopted consultation procedures set out in the SCI **had** been followed. In relation to English Heritage's view that the SA did not constitute a robust and credible evidence base for the plan documents (i.e. the seventh test of soundness), a number of amendments to the SA Report have now been agreed in principle through further correspondence. These agreed changes are set out in the accompanying schedule (to be tabled at the meeting).
- 4.6 22 respondents have raised substantive issues, which will have to be resolved by the Inspector through the Examination process.
- 4.7 Only 5 respondents have indicated that they would wish to attend the Hearings to support their representations that the Plan is not sound (The GLA re MOL and biodiversity; Capital on Site re. redevelopment of Redhouse Road and Strategic Industrial Locations; St James Group Ltd re Loss of MOL, housing supply, housing density and affordable housing; Costco Wholesale UK Ltd regarding Strategic Industrial Locations and the need for flexible definition of appropriate uses; and,

Heathdene Residents' Association re housing supply and density and tall buildings). One respondent, Sterecycle, has indicated that they wish to support the Council's case regarding the de-designation of MOL. The remaining respondents have indicated that their responses can be dealt with by way of written representations or have not indicated how they wish to progress.

4.8 Following an initial assessment, the main issues are:

- De-designation of MOL;
- Biodiversity;
- Housing Supply;
- Housing Density;
- Affordable Housing;
- Employment Land;
- Town Centres.

## **5. Proposed Amendments to the Core Planning Strategy: Proposed Submission**

5.1 Guidance is clear that the Council should consider the Plan sound at publication and therefore consideration of changes post publication should be avoided wherever possible. However it is recognised that minor changes to the Plan may be required, for example to deal with typographical errors or to make the Plan more legible. These are the kind of changes, which could be made without consultation, and these changes should simply be listed as a schedule to accompany the DPD when it is submitted to the Planning Inspector with a request that the Inspector consider these recommending these changes as part of his/her report.

5.2 Officers have identified a number of minor typographical errors and having considered the representations a number of minor changes have been identified which would help with the legibility of the Plan. These proposed changes are identified in the schedule in Appendix 3, which will be tabled at the meeting. However, it is further recommended that the Council agree that authority be delegated to the Executive Head of Planning and Transportation, in consultation with the Chair of the PAG, to submit further minor changes that may be identified through the process of preparing submissions to the Inspector.

5.3 These minor changes will be submitted to the Inspector, with a request that s/he recommends them in their final Report.

## **6. The Next Steps**

6.1 Having been in discussion with the Planning Inspectorate and GOL, there is now agreement over the following timetable:

- The draft Strategy will be submitted to the Secretary of State in March 2009;
- The Hearings will start in June 2009; and
- Adoption will be towards December 2009.

6.2 Details of the procedures for the next stage are set out in Appendix 4.

## **7. Financial Implications**

7.1 The costs of Submission and Examination cannot be determined until the extent of representations to be progressed at the Hearings is known. The most significant costs relate to the appointment of a Programme Officer (c £250 per day) and the Planning Inspector (£993 per day). Both posts will be paid on a pro rata basis, but the total cost is likely to be in the order of £75,000.

7.2 In the event that these costs cannot be funded from the 2009/10 Revenue Budget for Strategic Planning, including any unallocated sums from Housing and Planning Delivery Grant, the service group will need to consider alternative funding from within

the approved budget for the service group as a whole. As a last resort, a bid can be made for an allocation from the central contingency.

## **8. Influence on the Council's Core Values**

- 8.1 The preparation of the draft Strategy has involved consultation with the local community and all stakeholders. There has been a series of on-going one-to-one meetings with key stakeholders throughout the preparation of the Plan. Accordingly this has contributed to working in partnership with people living and working within the Borough and making the Council's services open and accessible.

## **9. Contribution to the Achievement of Council's Policy Aims**

- 9.1 Preparing the draft Strategy has contributed to the Council's aim of Achieving Environmental Sustainability by protecting our environment for now and in the future. It will also provide the spatial planning dimension for the Sutton Plan, the Sutton Strategy and the Local Area Agreement.

## **10. Equalities Impact Assessment**

- 10.1 The Council has produced an EqlA to accompany the Core Planning Strategy: Proposed Submission, which sets out how equalities have been taken into account in the preparation of the document.



**APPENDIX 1****GOL'S VIEW ON CONSISTENCY OF THE CPS WITH NATIONAL GUIDANCE**

1. GoL has raised the following five issues in respect of the final test of soundness, whether the Plan is consistent with national policy:

**Housing Density:** In accordance with PPS3 the Council should not allow for densities below 30 dph unless this is justified by evidence. GoL recognises that the Core Planning Strategy has moved some way to complying with national policy and the London Plan on the housing density issue and that the characterisation Report sets out local evidence to justify its position. However it has indicated that it is for the Inspector to review and consider this evidence and determine whether it is sufficient to justify the variation of the national minimum density guide.

**Viability:** In accordance with PPS3 the Council should demonstrate the economic viability of affordable housing targets and thresholds. GoL notes that Policy BP2 provides this evidence.

**Gypsies and Travellers:** GoL welcomes the inclusion of a criteria based policy, which is considered to be in accordance with Circular 01/2006.

**Metropolitan Open Land (MOL) & Green Belt:** GoL recognises that the London Plan sets out the same presumption against inappropriate development in MOL as the Green Belt and that the Inspector will require robust evidence in support of the proposed de-designation of MOL. GoL welcomes the reference to redevelopment of Major Developed Sites in Policy PMP9 in place of earlier references to redevelopment of previously developed land.

**Retail:** Whilst GoL had indicated previously that town centre boundary changes are best progressed through the Core Strategy rather than the Site Development Policies DPD it was acknowledged that as consultation had not been carried out on boundary changes as part of the Preferred Options the most pragmatic approach may be to bring changes forward through the Site Development Policies DPD in order to allow stakeholders to make representations.

**APPENDIX 2**

**List of Organisations and Individuals that made Representations:**

Specific Consultees	Government Office for London (GoL) Greater London Authority (GLA) English Heritage London Borough of Merton Metropolitan Police Authority (MPA) National Grid Natural England* Royal Borough of Kingston-upon-Thames Surrey County Council Sutton & Merton Primary Care Trust Thames Water Property Services The Coal Authority
Other Health Bodies	Institute of Cancer Research Royal Marsden NHS Foundation Trust (RMH)
National Groups	Friends, Families and Travellers The Theatres Trust
Local Groups	Friends of Beddington and Grange Parks Sutton Group of the London Wildlife Trust
Residents Associations	Carshalton Beeches Residents' Association Heathdene Area Residents' Group Highfields Residents' Association
Private Companies and Land Owners	AW Champion Barclays Bank plc Benhill Gospel Trust Capital on Site City Computing Costco Wholesale UK Ltd (Costco) Garratt Court Properties Ltd Hackbridge Property Unit Trust London Remade Phoenix Logistics St James Group Ltd Sainsbury's Supermarkets Ltd Stereecycle Wm Morrison Supermarkets Plc Mitcham Common Conservators*
Individuals	C Brown* G Potter

**\* received after the close of the representation period**

**APPENDIX 4****DETAILS OF STATUTORY PROCEDURES**

1. The Council must submit one paper copy and one e-copy of the following documents to the Secretary of State for purposes of public examination:
  - The Core Planning Strategy: Proposed Submission;
  - The Sustainability Appraisal;
  - The Submission Proposals Map;
  - The Statement of Community Involvement;
  - A statement (Reg. 28) setting out a summary of the representations received; a summary of the main issues raised by any representations;
  - Copies of the Regulation 28 representations; and
  - All other supporting documents i.e. the Reports of Study.
  
2. As soon as possible after submission the Council must carry out the following publicity of submission:
  - Make copies of all the documents listed above available in the Council's main offices and in Libraries;
  - Publish all the documents on the Council's website along with a Statement of the fact that the documents are available for inspection and announcing where they are available;
  - Send to Specific Consultation bodies all the documents along with a Statement of the fact that the documents are available for inspection and announcing where they are available;
  - Send to each of the General Consultation bodies invited to make representations notification that the documents are available for inspection and announcing where they are available;
  - Give notice by public advert of the title and subject of the DPD and that the documents are available for inspection and announcing where they are available; and
  - Give notice to persons who have requested to be notified of the submission.
  
3. The Council must also prepare a Self Assessment against the Tests of Soundness in order to demonstrate how the Plan has met all the Tests of Soundness including how all the procedural tests have been met.

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**PROPOSED CHANGES TO (1) CORE PLANNING STRATEGY ; (2) UDP PROPOSALS MAP PROPOSED ALTERATIONS; AND (3) SA REPORT**

**(1) Proposed Changes To Core Planning Strategy**

<b>Page</b>	<b>Policy/ Paragraph</b>	<b>Proposed Changes</b>	<b>Reasons</b>
Page 16	Paragraph 2.69	Add following to the end of the Paragraph: <u>“How to increase levels of provision, alleviating areas of deficiency, where possible, either through Planning Gain or Obligations for new development, or through other means.”</u>	To address representation submitted by Natural England (2.69/183)
Page 20	Paragraph 3.9	Delete following text from the second sentence: <u>“Other than the development of Major Developed Sites”</u>	For purposes of clarification
Page 29	Figure 3 – Key Diagram	Delete all notation for development proposals outside of the Borough in connection with the Hackbridge Sustainable Suburb and London Tramlink.	To address representation submitted by L B Merton (Fig. 3/126)
Page 33	Para 5.10	Add at end of paragraph: <u>“However, this distribution will not be used to prevent the development of sites which are consistent with other policies within the Development Plan.”</u>	To address representation submitted by St James Group (PMP1/168)
Page 34	PMP2	In line seven delete “creating” and replace with <u>“reinforcing”</u> .	To address representation submitted by English Heritage
Page 35	Para 5.27	Replace the last line of Paragraph with <u>“committed to raising standards to reduce these gaps”</u>	To address representation submitted by Carshalton Beeches RA (5.27/112)
Page 45	PMP6	In third bullet point, insert <u>“and protection”</u> after ‘creation’.	To address representation submitted by A W Champion Ltd (5.70/042; 5.74/049; and PMP6/053)

Page	Policy/ Paragraph	Proposed Changes	Reasons
Page 46	Para 5.79	Change word “price” to “pride” in eighth line of the paragraph.	Typographical error
Page 50	Paragraph 5.105 (2 <sup>nd</sup> bullet point)	Amend 2 <sup>nd</sup> bullet point as follows: <ul style="list-style-type: none"> <li>Maximising the potential role of renewable energy sources and decentralised energy infrastructure;</li> </ul>	To address representation submitted by GLA (PMP7/076)
Page 50 (and 85)	Paragraph 5.105 (and 6.95)	Insert footnote against the term ‘low carbon zone’ as follows: 15: see <u>Glossary for full definition of ‘low carbon zone’</u>	To address representation submitted by GLA (PMP7/076)
Page 50 (and 85)	Paragraph 5.105 (and 6.95)	Insert footnotes against the term ‘zero carbon standards’ as follows: 16: see <u>Glossary for full definition of ‘zero carbon standards’</u>	To address representation submitted by GLA (PMP7/076)
Page 56	Paragraph 5.144	In line seven, after “recreational role” add “ <u>and indeed offer many health benefits</u> ”.	To address representation submitted by Mr C Brown (BP5/133)
Page 56	Paragraph 5.144	Delete the reference to 33 allotments and replace with reference to 35 allotments.	Typographical/factual error
Page 59	Figure 4	Change text in key to: “ <u>New road link/diverted traffic</u> ”	To address representation submitted by A W Champion Ltd
Page 69	Para 6.10	In line eight delete “urban design2 and add “ <u>achieving high standards of urban design in accordance with Policy BP12.</u> ” In line 12 delete “flexibly, particularly” and add the word “ <u>flexibly</u> ” to the end of the sentence.	To address representation submitted by GLA (BP1/078)
Page 75	Para 6.41	Delete whole paragraph and replace with: “ <u>Further Gypsy and Traveller provision will be sought in order to meet any targets set out in future revisions to the London Plan. Preferred site(s) will be identified by the Council in conjunction with the Gypsy and Traveller community and brought forward through a separate Gypsy and Traveller DPD. It is intended that all pitches will be affordable as they will be owned by the Council and either managed by the Council or a</u>	To address representation submitted by Friends, Family and Travellers (BP3/094)

Page	Policy/ Paragraph	Proposed Changes	Reasons
Page 80	BP5	<p><u>Registered Social Landlord.</u></p> <p>In line four of the Policy delete the reference to "local hospital at St Helier" and replace with "<u>Local Acute Hospital at St Helier</u>"</p>	To address representation submitted by Sutton and Merton PCT (BP5/130)
Page 80	Para 6.70	In line eight delete the reference to "local hospital at St Helier" and replace with " <u>Local Acute Hospital at St Helier</u> "	To address representation submitted by Sutton and Merton PCT (BP5/130)
Page 81	Para 6.77	In line 1 delete 'Creating Sustainable Communities' and replace with " <u>Delivering Sustainable Development</u> "	Factual Error
Page 81	Paragraph 6.76	<p>Amend Paragraph as follows:</p> <p>6.76 Under Kyoto, the UK has a commitment to reduce greenhouse gas emissions by 12.5% below 1990 levels by 2012. <u>The Climate Change Bill, which passed into law in November 2008, seeks to ensure the transition towards a low carbon economy by introducing the world's first long term legally binding framework to tackle climate change. National targets are set to reduce greenhouse gas emissions by at least 80% by 2050 and to reduce carbon dioxide emissions by at least 26% by 2020 against a 1990 baseline. The Government's Climate Change Programme seeks to reduce carbon dioxide emissions by 60% by 2050 with real progress by 2020. The Climate Change Bill will introduce a legal framework for achieving these targets.</u></p>	To address representation submitted by GLA (BP6/079)

Page	Policy/ Paragraph	Proposed Changes	Reasons
Page 81	Paragraph 6.79	<p>Amend Paragraph as follows:</p> <p>6.79 Planning authorities are encouraged to focus on area or site-specific opportunities in setting local targets for reducing carbon dioxide emissions, based on an understanding of the local potential for renewable or low-carbon energy and existing or planned decentralised energy infrastructure, such as CHP<sup>22</sup> or CCHP<sup>23</sup> networks to serve new development.</p>	To address representation submitted by GLA (BP6/079)
Page 82	Paragraph 6.84	<p>Amend and split Paragraph as follows:</p> <p>6.84 London Plan Policy 4A.5 requires Boroughs to identify and safeguard existing heating and cooling networks and to maximise the opportunities for providing new networks supplied by decentralised energy. All new developments should be designed to connect to existing heating and cooling networks. <del>Under</del> Policy 4A.6 requires all developments <del>are</del> required to demonstrate that their heating, cooling and power systems have been selected to minimise carbon dioxide emissions. <u>Developments should evaluate CCHP and CHP systems and where a new CCHP/CHP system is installed as part of a new development, examine opportunities to extend the scheme beyond the site boundary to adjacent areas.</u></p> <p><u>6.85</u> Policy 4A.7 sets a presumption that developments will achieve a reduction in carbon dioxide emissions of at least 20% from on site renewables. Policy 4A.3 requires developments to meet the highest standards of sustainable design and construction and identifies a range of measures to be addressed. The 'essential' and 'preferred' standards set out in the Mayor's SPG<sup>1</sup> are currently being reviewed to reflect updated London Plan policies and the Code for Sustainable Homes.</p>	To address representation submitted by GLA (BP6/079)

<sup>1</sup> Supplementary Planning Guidance on Sustainable Design and Construction (GLA, 2006)

Page	Policy/ Paragraph	Proposed Changes	Reasons
Page 83	Paragraph 6.88	Replace 4A1 and 4A7 with 4A.1 and 4A.7	Typographical error
Page 84	Paragraph 6.90 (6 <sup>th</sup> bullet point)	<p>Amend text as follows:</p> <ul style="list-style-type: none"> <li>Requiring all developments to achieve a minimum percentage reduction in carbon dioxide emissions from on-site renewables where feasible <u>(at least in accordance with the minimum percentage reduction of 20% required under London Plan Policy 4A.7).</u></li> </ul>	To address representation submitted by GLA (BP6/079)
Page 87	Core Policy BP7 on 'Flood Risk and Climate Change Adaptation' (3 <sup>rd</sup> bullet point)	<p>Amend text as follows:</p> <ul style="list-style-type: none"> <li><u>Considering flood risk in line with PPS25 by ensuring that any new certain classes of development located within a higher flood risk areas demonstrates compliance with the 'Exception Test' according to Table D3 of PPS25 by (i) providing wider sustainability benefits that outweigh flood risks (ii) being located on previously developed land and (iii) is safe, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall;</u></li> </ul>	To address representation submitted by GLA (BP7/080)
Pages 86-87	Paragraph 6.107	<p>Amend Paragraph as follows:</p> <p><u>6.179 Policy 4A.14 of the London Plan promotes the use of sustainable urban drainage systems (SUDS) and rainwater harvesting as part of development in order to minimise run-off from the site to municipal drainage systems or watercourses. Boroughs should seek to ensure that surface water run-off is managed as close to its source as possible in line with the Mayor's drainage hierarchy:</u></p> <ul style="list-style-type: none"> <li><u>store rainwater for later use;</u></li> <li><u>use infiltration techniques, such as porous surfaces in non-clay areas;</u></li> <li><u>attenuate rainwater in ponds or open water features for gradual release to a watercourse;</u></li> <li><u>attenuate rainwater by storing in tanks or sealed water features for gradual release to a watercourse;</u></li> <li><u>discharge rainwater direct to a watercourse;</u></li> <li><u>discharge rainwater to a surface water drain; and</u></li> </ul>	To address representation submitted by GLA (BP7/080)

Page	Policy/ Paragraph	Proposed Changes	Reasons
Page 87	Core Policy BP7 on 'Flood Risk and Climate Change Adaptation' (5 <sup>th</sup> bullet point)	<ul style="list-style-type: none"> <li>• <u>discharge rainwater to the combined sewer.</u></li> </ul> <p>Amend text as follows:</p> <ul style="list-style-type: none"> <li>• Promoting the most effective adaptation to the impacts of climate change as part of new development, <u>in accordance with the Mayor's drainage hierarchy</u>, including SUDS and its role in achieving wider sustainability benefits for biodiversity, water quality and local amenity</li> </ul>	To address representation submitted by GLA (BP7/080)
Page 97	BP10	Add " <u>and neighbouring boroughs</u> " after "rail operators and developers..." in the first sentence	To address representation submitted by RB Kingston (Promoting Sustainable Transport/034)
Page 99	Paragraph 6.163	<p>Insert new Paragraph 6.163 as follows:</p> <p><u>6.179 The London Plan recognises the importance of abating the adverse effects of noise and maintaining or enhancing soundscape quality at both the local and strategic levels in making places liveable. Policy 4A.20 on 'Reducing Noise and Enhancing Soundscapes' emphasises the need for Boroughs to minimise the existing and potential adverse impacts of noise arising from new development through sensitive design, management and operation and by separating new noise sensitive development from major noise sources wherever practicable. The Council will introduce appropriate criteria-based policies on noise in the Site Development Policies DPD.</u></p>	To address representation submitted by GLA (General/ 087)
Page 103	Paragraph 6.190	Replace reference to Policy 4B.8 with Policy 4B.9 and replace reference to 4B.9 with 4B.10.	To address representation submitted by GLA (BP13/083)
Page 108	Paragraph 7.24	Add the following footnote to this Paragraph: " <u>Infrastructure has a broad definition as identified in PPS12 and includes physical, social and community, and green infrastructure</u> ".	To address representation submitted by Benhill

Page	Policy/ Paragraph	Proposed Changes	Reasons
Page 110	Paragraph 7.34	Delete the second sentence.	Gospel Trust (BP3/052) and the MPA (PMP7/031) To address representation submitted by Benhill Gospel Trust (BP3/052) and the MPA (PMP7/031)
Page 143	Glossary	Insert definition of 'zero carbon standards' as follows: <b><u>Zero Carbon Standards:</u></b> for the purposes of Policies PMP7 and BP6, 'zero carbon standards' means zero net carbon emissions (or better) from all energy used in new developments, including the energy consumed for space heating/ cooling, hot water, ventilation and lighting (i.e. regulated emissions) and electrical appliances. This can take into account of contributions from onsite renewable/low carbon installations. <u>Off-site renewable contributions can only be counted where these are directly supplied to the buildings by private wire arrangement.</u>	To address representation submitted by GLA (PMP7/076)
Page 143	Glossary	Insert definition of 'low carbon zone' as follows: <b><u>Low Carbon Zone:</u></b> for the purposes of Policies PMP7 and BP6, a 'Low Carbon Zone' is defined by the London Energy Partnership as "a self defined geographical area where over a set period of time a range of coordinated activities take place, involving a breadth of stakeholders, with the express purpose of reducing carbon emissions, increasing energy efficiency and alleviating fuel poverty. They have grown out of and are a development of Energy Action Areas, of which there are already four in London (Barking Town Centre, Elephant and Castle, New Wembley and Mitcham Town Centre)".	To address representation submitted by GLA (PMP7/076)

Page	Policy/ Paragraph	Proposed Changes	Reasons
Page 145	First two sentences	Amend text as follows: “ <u>police shops, safer neighbourhood accommodation and general police facilities.</u> ”	To address representation submitted by the MPA (PMP7/031)

**(2) Proposed Changes To UDP Proposals Map Proposed Alterations**

Page	Map Ref	Proposed Changes	Reasons
Page 14	Proposed Wandle Valley Regional Park – Map 1	Amend the boundary to exclude the Country Skips Site in order to correspond with the boundary shown on the Map on Page 10 – Land North of Mille Road	Mapping Error

(2) Proposed Changes To Sa Report

Page	Policy/ Paragraph	Proposed Changes	Reasons
<p><b>SA REPORT</b> Page 15</p>	<p><b>SA REPORT</b> Paragraph 4.5</p>	<p>Amend Paragraph as follows:</p> <p>4.5 The sustainability objectives, targets and indicators to be developed for inclusion in the SA Framework must have regard to the underlying objectives and key targets associated with the following international strategies, plans and programmes:</p> <ul style="list-style-type: none"> <li>• Johannesburg Declaration on Sustainable Development (UN, 2002);</li> <li>• Kyoto Agreement (1997);</li> <li>• Inter-Governmental Panel on Climate Change (IPCC) Fourth Report (September 2007);</li> <li>• EU Spatial Development Perspective (1999);</li> <li>• EU Sustainable Development Strategy (2001);</li> <li>• EU Ambient Air Quality Directive (1996/62/EC) and Air Quality Daughter Directive (1999/30/EC);</li> <li>• EU Habitats Directive (1997/62/EC);</li> <li>• EU Wild Birds Directive (1997/49/EC);</li> <li>• EU Directive on Environmental Noise (2002/49/EC);</li> <li>• EU Framework Directive on Waste (1991/156/EEC);</li> <li>• EU Landfill Directive (1999/31/EC); <del>and</del></li> <li>• EU Water Framework Directive (2000/60/EC); <u>and</u></li> <li>• <u>European Landscape Convention 2000 (Council of Europe Treaty Series no. 176).</u></li> </ul>	<p>To address representation submitted by English Heritage (General/SA8)</p>
<p><b>SA REPORT</b> Page 17</p>	<p><b>SA REPORT</b> Paragraph 4.14</p>	<p>Insert new Paragraph as follows:</p> <p>4.14 <u>PPG16 on 'Archaeology and Planning' (2001) sets out the Government's policy on archaeological remains on land and how they should be preserved or recorded both in an urban setting and in the countryside. Development plans should reconcile the need for development with the interests of conservation including archaeology and include policies for the protection, enhancement and preservation of sites of archaeological interest and of their settings.</u></p>	<p>To address representation submitted by English Heritage (General/SA8)</p>

Page	Policy/ Paragraph	Proposed Changes	Reasons
SA REPORT Page 22	SA REPORT Paragraph 5.10	<p>Insert new Paragraph as follows:</p> <p>5.10 A comprehensive list of Council publications, studies undertaken by consultants on behalf of the Council and other sources of data, including national publications and websites, is provided in Appendix 1.</p>	To address representation submitted by English Heritage (General/SA8)
SA REPORT Page 39	SA REPORT Paragraphs 5.116 to 5.119	<p>Amend text as follows:</p> <p><b>Nature Conservation and Biodiversity</b></p> <p><u>5.116</u> In order to facilitate LDF and Local Biodiversity Action Plan (BAP) monitoring, the Council registered with the Greenspace Information Database for Greater London (GiGL) maintained by the London Wildlife Trust on behalf of the GLA, in 2007. The most recent data on biodiversity and habitats within the Borough was provided to the Council by GiGL in September 2008 as part of the current Service Level Agreement.</p> <p><u>5.117</u> <del>5.116</del> The Borough contains several important habitats, including important chalk grassland sites such as Roundshaw Downs and Woodcote Park Golf Course. A number of sites, for example Cuddington Way Grassland require on-going management to maintain and enhance their biodiversity value. The Wandale supports many excellent plant communities with several rare species. <del>Areas of low accessibility to nature conservation sites exist to the south of Wallington and in the north west of the Borough.</del></p> <p><u>5.117</u> There are 49 Sites of Importance for Nature Conservation (SINCs) within the Borough including 5 sites of 'Metropolitan Importance' occupying a total of 313.97 ha at the Upper River Wandale, Beddington Farmlands, Mitcham Common, Roundshaw Downs and Woodcote Park Golf Course, 30 sites of 'Borough Importance' (326.47 ha) and 14 sites of 'local importance'. <u>Between September 2007 and September 2008, there was no change in the total area or status of SINCs within the Borough.</u></p>	To address representation submitted by Natural England (Open Land and Nature Conservation Issues/ SA4)

Page	Policy/ Paragraph	Proposed Changes	Reasons
		<p>5.118 There are 10 Local Nature Reserves, occupying a total area of 48.04 ha. In October 2006, the Council declared 2 new local nature reserves, at Belmont Pastures and Anton Crescent Wetland.</p> <p>5.119 <u>Map 5.9 shows Areas of Deficiency in relation to all publicly accessible Metropolitan or Borough grade SINC's within the Borough</u>. <u>Areas of low accessibility to nature conservation sites are predominant to the south of Wallington and towards the north-west of the Borough. Areas of Deficiency, which currently amount to a total area of 904.63 ha or 20.69% of the Borough, have remained unchanged since 2007. However there has been a very small overall increase in the total area of deficiency (0.05 ha) since 2006, when this figure was 904.57 ha. Access to Sites of Interest for Nature Conservation within the Borough is shown in Map 5-9.</u></p> <p>5.120 <u>All London Biodiversity Action Plan Species and the extent of priority habitats within the Borough (based on GIGL data) are set out in detail in Appendices 8.6 and 8.7 of the Sutton AMR 2007-08 respectively.</u></p>	
<b>SA REPORT</b> Page 54	<b>SA REPORT</b> Map 5.6: Characterisation in Sutton	Amend Map to indicate location of Archaeological Priority Areas and Scheduled Ancient Monuments	To address representation submitted by English Heritage (General/SA8)
<b>SA REPORT</b> Pages 54 (and 85-86)	<b>SA REPORT</b> Tables 7.2 and 10.2 (SA Framework)	Amend title of Sub-Objective 2.2 as follows:  2.2 Townscape Quality and Local Character	To address representation submitted by English Heritage (International/ National/ regional Guidance/125)
<b>SA REPORT</b> Pages 54 (and 85-86)	<b>SA REPORT</b> Tables 7.2 and 10.2 (SA Framework)	Delete Sub-Objective 2.3 as follows  <b>2.3 Historic Environment</b> <del>To preserve the Borough's historic environment and cultural assets, including Conservation Areas, buildings of architectural and historic interest (listed buildings), historic parks and gardens and archaeology.</del>	To address representation submitted by English Heritage (International/ National/ regional Guidance/125)

Page	Policy/ Paragraph	Proposed Changes	Reasons
<p><b>SA REPORT</b> Pages 54 (and 85-86)</p>	<p><b>SA REPORT</b> Tables 7.2 and 10.2 (SA Framework)</p>	<p>Insert new SA Objective as follows:  <b><u>(2a) Historic and Cultural Environment</u></b> <u>To conserve and where appropriate enhance the Borough's historic environment and cultural assets</u></p>	<p>To address representation submitted by English Heritage (International/ National/ regional Guidance/125)</p>
<p><b>SA REPORT</b> Pages 54 (and 85-86)</p>	<p><b>SA REPORT</b> Tables 7.2 and 10.2 (SA Framework)</p>	<p>Insert new SA Sub-Objective as follows:  <u>(2a.1) Historic and Cultural Environment</u> <u>To preserve or enhance the Borough's historic environment and cultural heritage, including Conservation Areas, Areas of Special Local Character, buildings of architectural and historic interest (listed buildings), historic parks and gardens and archaeology priority areas.</u>  Amend Sub-Objective 3.4 as follows:</p>	<p>To address representation submitted by English Heritage (International/ National/ regional Guidance/125)</p>
<p><b>SA REPORT</b> Page 65 (and Pages 90-91)</p>	<p><b>SA REPORT</b> Table 7.2 (and Table 10.2)</p>	<p><b>3.4 Biodiversity and Habitats</b> <u>To maintain, enhance, and protect the integrity of Sites of Interest for Nature Conservation (SINCs), enhance priority habitats and protect species and biodiversity throughout the Borough and to maximise opportunities to build in beneficial biodiversity or geological features as part of new developments through good design using planning obligations where appropriate.</u></p>	<p>To address representation submitted by Natural England (7.2/SA5)</p>
<p><b>SA REPORT</b> Page 131</p>	<p><b>SA REPORT</b> Appendix 1 under 'National Publications and Websites'</p>	<p>Amend heading and insert additional references as follows: <b><u>National Publications, and Websites and other sources of data</u></b></p> <ul style="list-style-type: none"> <li>• <u>Greater London Sites and Monuments Record;</u></li> <li>• <u>The Schedule of Buildings of Architectural and Historic Interest (listed buildings);</u></li> <li>• <u>The borough's conservation area records and adopted guidance (including conservation area designation reports, statements, appraisals and design guidance);</u></li> <li>• <u>Sutton list of Locally Listed Buildings;</u></li> <li>• <u>The Register of Historic Parks and Gardens</u></li> <li>• <u>The London Buildings at Risk Register;</u></li> <li>• <u>The HELM website <a href="http://www.helm.org.uk">www.helm.org.uk</a> ; and</u></li> <li>• <u>The Heritage Counts website <a href="http://www.heritagecounts.org.uk">www.heritagecounts.org.uk</a>.</u></li> </ul>	<p>To address representation submitted by English Heritage (General/SA8)</p>

Page	Policy/ Paragraph	Proposed Changes	Reasons
<p><b>SA REPORT</b> Pages 135</p>	<p><b>SA REPORT</b> Appendix 3 (2<sup>nd</sup> row, 3<sup>rd</sup> column) relating to European Landscape Convention</p>	<p>Amend text as follows:</p> <p><u>2.1 To promote an attractive living environment for all by improving the design and layout of buildings and public spaces throughout the Borough</u></p> <p><u>2.2 To enhance townscape quality, respect local character and safeguard the distinctive suburban character of the Borough</u></p> <p><u>2a.1 To preserve or enhance the Borough's historic environment and cultural heritage, including Conservation Areas, Areas of Special Local Character, buildings of architectural and historic interest (listed buildings), historic parks and gardens and archaeology priority areas.</u></p> <p><u>3.3 To maintain the quality of open landscape and strategic views.</u></p> <p><u>8.1 To maintain and enhance internationally, nationally, regionally and locally designated wildlife sites</u></p> <p>8.2 To enhance priority habitats and protect species and biodiversity within Sth London</p>	<p>To address representation submitted by English Heritage (General/SA8)</p>
<p><b>SA REPORT</b> Pages 142</p>	<p><b>SA REPORT</b> Appendix 3 (3<sup>rd</sup> row, 3<sup>rd</sup> column) relating to Planning (Listed Buildings and Conservation Areas) Act 1990</p>	<p>Amend text as follows:</p> <p><u>2.1 To promote an attractive living environment for all by improving the design and layout of buildings and public spaces throughout the Borough</u></p> <p><u>2.2 To enhance townscape quality, respect local character and safeguard the distinctive suburban character of the Borough</u></p> <p><u>2a.1 To preserve or enhance the Borough's historic environment and cultural heritage, including Conservation Areas, Areas of Special Local Character, buildings of architectural and historic interest (listed buildings), historic parks and gardens and archaeology priority areas.</u></p> <p><u>3.3 To maintain the quality of open landscape and strategic views.</u></p> <p><u>8.1 To maintain and enhance internationally, nationally, regionally and locally designated wildlife sites</u></p> <p><u>8.2 To enhance priority habitats and protect species and biodiversity within Sth London</u></p>	<p>To address representation submitted by English Heritage (General/SA8)</p>

Page	Policy/ Paragraph	Proposed Changes	Reasons
<b>SA REPORT</b> Page 142	<b>SA REPORT</b> Appendix 3 (4 <sup>th</sup> row, 3 <sup>rd</sup> column) relating to the Ancient Monuments and Archaeological Areas Act	<p>Amend text as follows:</p> <p><u>2.2 To enhance townscape quality, respect local character and safeguard the distinctive suburban character of the Borough</u></p> <p><u>2a.1 To preserve or enhance the Borough's historic environment and cultural heritage, including Conservation Areas, Areas of Special Local Character, buildings of architectural and historic interest (listed buildings), historic parks and gardens and archaeology priority areas.</u></p> <p><u>3.3 To maintain the quality of open landscape and strategic views.</u></p> <p><u>8.1 To maintain and enhance internationally, nationally, regionally and locally designated wildlife sites</u></p> <p><u>8.2 To enhance priority habitats and protect species and biodiversity within Sth London</u></p>	<p>To address representation submitted by English Heritage (General/SA8)</p>
<b>SA REPORT</b> Page 143	<b>SA REPORT</b> Appendix 3 (1 <sup>st</sup> row, 3 <sup>rd</sup> column) relating to 'The Historic Environment: A Force for Our Future'	<p>Amend text as follows:</p> <p><u>2.1 To promote an attractive living environment for all by improving the design and layout of buildings and public spaces throughout the Borough</u></p> <p><u>2.2 To enhance townscape quality, respect local character and safeguard the distinctive suburban character of the Borough</u></p> <p><u>2a.1 To preserve or enhance the Borough's historic environment and cultural heritage, including Conservation Areas, Areas of Special Local Character, buildings of architectural and historic interest (listed buildings), historic parks and gardens and archaeology priority areas.</u></p> <p><u>3.3 To maintain the quality of open landscape and strategic views.</u></p> <p><u>8.1 To maintain and enhance internationally, nationally, regionally and locally designated wildlife sites</u></p> <p><u>8.2 To enhance priority habitats and protect species and biodiversity within Sth London</u></p>	<p>To address representation submitted by English Heritage (General/SA8)</p>
<b>SA REPORT</b> Page 146	<b>SA REPORT</b> Appendix 3 (3 <sup>rd</sup> row, 3 <sup>rd</sup> column) relating to PPG15 on 'Planning and the Historic Environment'	<p>Amend text as follows:</p> <p><u>2.1 To promote an attractive living environment for all by improving the design and layout of buildings and public spaces throughout the Borough</u></p>	<p>To address representation submitted by English Heritage (General/SA8)</p>

Page	Policy/ Paragraph	Proposed Changes	Reasons
<p><b>SA REPORT</b> Page 147</p>	<p><b>SA REPORT</b> Appendix 3 (3<sup>rd</sup> row, 1<sup>st</sup> column) relating to PPG16 on 'Archaeology and Planning'</p>	<p><u>2a.1</u> To preserve or enhance the Borough's historic environment and cultural heritage, including Conservation Areas, Areas of Special Local Character, buildings of architectural and historic interest (listed buildings), historic parks and gardens and archaeology priority areas.</p> <p><u>9.1</u> To ensure that waste facilities meet high quality design principles that respect local character</p> <p><u>9.2</u> To preserve and enhance the quality and distinctiveness of Sth London's historic environment and cultural assets</p> <p>Amend text as follows:</p> <p><u>2.1</u> To promote an attractive living environment for all by improving the design and layout of buildings and public spaces throughout the Borough</p> <p><u>2a.1</u> To preserve or enhance the Borough's historic environment and cultural heritage, including Conservation Areas, Areas of Special Local Character, buildings of architectural and historic interest (listed buildings), historic parks and gardens and archaeology priority areas.</p> <p><u>9.2</u> To preserve and enhance the quality and distinctiveness of Sth London's historic environment and cultural assets</p>	<p>To address representation submitted by English Heritage (General/SA8)</p>

**London Borough of Sutton  
Planning Advisory Group – 10 February 2009**

**Supplementary Report of the Executive Head of Planning and  
Transportation**

**CORE PLANNING STRATEGY – ADDITIONAL REPRESENTATION**

Ward Location: All wards

**Author:** Jeff Wilson (x6258)

Area Served: All wards

**Lead Councillor:** Lyn Gleeson

**Key Decision Report**

**Summary**

This Supplementary Report deals with an issue raised through a late representation on the Core Planning Strategy following the publication of the Proposed Submission document, which was made to and supported by the Carshalton and Clockhouse Local Committee and which was not considered in the Report to the Planning Advisory Group.

**Recommendations**

I recommend that **the Planning Advisory Group:**

- (a) Agrees to consider the late representation on behalf of the Carshalton-on-the-Hill Residents' Association, which was not duly made, and to forward its recommendation to The Executive for consideration and approval and for submission to The Council at its meeting on 2 March 2009, recommending approval;
- (b) Agrees that no alterations be made to the Core Planning Strategy, Proposed Submission document in respect this representation and to forward its recommendation to The Executive meeting for approval;
- (c) Agrees to refer this Report to the Carshalton and Clockhouse Local Committee for consideration.

**1. Background**

- 1.1 Members will be aware that the Core Strategy, Proposed Submission was approved by the Council for publication in November 2008 and that the period for formal representations on the Proposed Submission ran from 12 November 2008 to 7 January 2009.
- 1.2 At the meeting of the Carshalton and Clockhouse Local Committee on 16 December 2008, Mr. Ray Liffen, the Community Representative attending on behalf of the Carshalton-on-the-Hill Residents' Association made representations to the Local Committee under 'Any Urgent Business' on the Core Planning Strategy, Proposed Submission in relation to Core Policy PMP9, requesting that the proposed designation of the former Orchard Hill and BIBRA sites as 'major developed sites' should be deleted.

**2. Details of the Representation**

- 2.1 Following the Local Committee meeting, Ray Liffen submitted a representation on behalf of Carshalton-on-the Hill Residents' Association in a letter dated 5 February 2009'. Details of the representation are attached as an Appendix to this Report and are summarised in the relevant Council Minute (Ref. 1092/08) of the Local Committee meeting. This states that:

*“Ray Liffen asked the Committee to request that PMP9 of the Core Planning Strategy be changed to remove the words “The Council will designate the former Orchard Hill Hospital and BIBRA sites as ‘Major Developed Sites’.*

*The former BIBRA site was designated as Green Belt under the present Unitary Development Plan (UDP). HM Government’s Planning Policy Guideline 2 (PPG2) which gave protection to land designated as Green Belt to prevent urban sprawl. To make the former BIBRA site a ‘Major Developed Site’ would permit a southward tongue of housing development to be inserted into the present boundary of built-up London. This could act as a precedent for further speculative development in the nearby Green Belt.*

*The present UDP defined an east-west ‘ridge line’ between the southernmost points in the housing developments on either side of Orchard Hill. No school buildings for the planned redevelopment of Stanley Park High School are allowed south of this line (only playing fields). Houses on the BIBRA site would be south of the ridge line and would reduce the openness of the Green Belt. As stated in both PPG2 and the UDP, openness is an essential Green Belt feature, as is permanence.*

*The BIBRA site was brought by the Plymouth Brethren 2004 on a speculative basis. In 2008 their planning application was rejected by Sutton’s Development Control Committee because it did not comply with the UDP. Despite this, an Appeal to the Planning Inspectorate had been lodged. This would have to be defended if the Planning Inspector was shown PMP9, in its present form, he would be forced to assume that Sutton Council wishes for houses to be built and the Appeal would be lost.*

*Ray Liffen highlighted that the PMP9 was factually incorrect since Orchard Hill was already a Major Developed Site under the existing UDP”*

2.2 The Local Committee resolved that the committee unanimously supported the recommendation put forward by Mr Ray Liffen.

2.3 Members should be aware that the representation made by Carl Brown (Ref. PMP9/132, 033473, Page 59 of the Schedule of Representations) also objects to Core Policy PM9 on much the same grounds.

### **3. Officers’ Views**

3.1 The proposed designation of the former Orchard Hill and BIBRA sites as ‘major developed sites’ in the Green Belt under Core Policy PMP9 of the Core Planning Strategy recognises the extent and location of existing, redundant/vacant buildings in the Little Woodcote area and the opportunities for environmental improvement, which the future redevelopment of these buildings, in accordance with Government guidance in PPG2, presents without adding to their impact on the openness of the Green Belt and the purposes of including land within it. Under Core Policy PMP9, it is not proposed to remove either of these sites from the Green Belt, alter the boundaries of the statutory Green Belt or affect the permanence of the Green Belt within the Borough.

3.2 Whilst the former Orchard Hill site is designated as a major developed site in the adopted Sutton UDP, the new planning system brought in through the 2004 Act requires all of the Council’s development plan policies, including those ‘saved’ for a transitional period in September 2007, to be reviewed in the Local Development Framework for Sutton.

- 3.3 Members should also be aware that Government guidance in Revised PPS12 is clear that the publication allows representations relating to issues of soundness to be made and taken into account at Examination. Consequently, there is little or no scope for changes to the Proposed Submission document prior to Examination.
- 3.4 I therefore recommend that this representation, although not duly made within the consultation period, should be considered. Insofar as this representation affects the soundness of the Core Planning Strategy, I also recommend that it should be submitted to the Planning Inspector (together with the representation made by Carl Brown and all other representations affecting the soundness of the draft Strategy) for consideration in relation to the forthcoming Examination.

#### **4. Financial Implications**

- 4.1 The costs of Submission and Examination cannot be determined until the extent of representations to be progressed at the Hearings is known. The most significant costs relate to the appointment of a Programme Officer (c £250 per day) and the Planning Inspector (£993 per day). Both posts will be paid on a pro rata basis, but the total cost is likely to be in the order of £75,000.
- 4.2 In the event that these costs cannot be funded from the 2009/10 Revenue Budget for Strategic Planning, including any unallocated sums from Housing and Planning Delivery Grant, the service group will need to consider alternative funding from within the approved budget for the service group as a whole. As a last resort, a bid can be made for an allocation from the central contingency.

#### **5. Influence on the Council's Core Values**

- 5.1 The preparation of the draft Strategy has involved consultation with the local community and all stakeholders. There has been a series of on-going one-to-one meetings with key stakeholders throughout the preparation of the Plan. Accordingly this has contributed to working in partnership with people living and working within the Borough and making the Council's services open and accessible.

#### **6. Contribution to the Achievement of Council's Policy Aims**

- 6.1 Preparing the draft Strategy has contributed to the Council's aim of Achieving Environmental Sustainability by protecting our environment for now and in the future. It will also provide the spatial planning dimension for the Sutton Plan, the Sutton Strategy and the Local Area Agreement.

#### **7. Equalities Impact Assessment**

- 7.1 The Council has produced an EqIA to accompany the Core Planning Strategy: Proposed Submission, which sets out how equalities have been taken into account in the preparation of the document.

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