

**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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