



Open Land and Biodiversity

Introduction

- 6.1** There has been extensive research into strategic and local open land in the Borough: firstly in terms of the identification of defensible Green Belt and Metropolitan Open Land (MOL) boundaries; secondly, into the supply and demand for open space, level of pitch provision and allotments; and finally into the Sites of Importance for Nature Conservation (SINCs).
- 6.2** This section summarises the research and the findings set out in the previous Report of Studies and summarises the outcome of the Inspector's Report into the Core Planning Strategy: Proposed Submission document which has implications for Green Belt, MOL and SINCs. It also updates allotment statistics.

Green Belt

Background

- 6.3** In the London Borough of Sutton there are two areas of Green Belt located to the south of the Borough: the 'Little Woodcote Area' to the southeast; and the 'Cuddington Area' to the southwest. Currently 616 ha of the Borough are designated as Metropolitan Green Belt. The previous Reports of Study should be referred to for the history of the designation of Green Belt in the Borough.
- 6.4** The Orchard Hill site was identified as a Major Developed Site (MDS) in the Sutton UDP. The former MRC and Queen Mary's sites had already been given planning permission for residential development and the implementation of these schemes had commenced therefore these sites were not identified as MDS in the Green Belt.

Review of Green Belt (2006)

- 6.5** In line with Government advice that Green Belt boundaries should only be reviewed in exceptional circumstances and, ideally through the development plan process, the Council again reviewed the Green Belt boundaries in 2006 as part of the preparation of the Core Planning Strategy: Issues and Options Report.
- 6.6** A key finding from the 2006 Review regarding MDS was that the British Industrial Biological Research Association (BIBRA) site was now vacant and there was evidence that the buildings cannot be re-used due to their physical condition. It was therefore

considered that it might be appropriate to designate BIBRA as an MDS in the Core Planning Strategy in order to manage the proposed redevelopment in the area.

- 6.7** The Housing Chapter of the 2006 Report of Studies also indicated that further work was required to assess how different levels of housing growth could be accommodated in the Borough in the most sustainable way. Accordingly, the 2006 Report of Studies indicated that a Review of the need for safeguarded land or further amendments to the Green Belt boundary should be undertaken in conjunction with the work on housing needs.

Review of Green Belt (2007)

Boundaries and Development Need

- 6.8** With regard to future residential development needs, the Housing Chapter of the 2007 Report of Studies demonstrated that the Council could be able to meet the Mayor's housing target within the urban/built up area of the Borough. Consequently, there was no need to identify land to be safeguarded for housing and that the current Green Belt boundary should remain unaltered.

Major Developed Sites (MDS) Issues – Orchard Hill

- 6.9** As indicated above the Orchard Hill site is proposed for redevelopment. It is identified as an MDS in the Saved Policies of the adopted Sutton UDP and the intention is to maintain its status as an MDS. A Supplementary Planning Document (SPD) was approved in November 2007 setting out guidance for the redevelopment of this site. The approved SPD identifies two approaches: the Preferred Development Proposal is to develop a new secondary school with residential and other uses; and an Alternative Development Proposal is to develop residential and other uses.

- 6.10** The SPD establishes eight objectives for any redevelopment:
- To create a sustainable development;
 - To provide a robust and flexible framework capable of including a secondary school;
 - To establish a new community incorporating an integrated mix of high quality housing and appropriate community amenities;
 - To ensure Orchard Hill has a clearly identifiable character and positive identity;
 - To create a place that is easy to get to and move through;
 - To create and enhance public access to the open countryside;
 - To make the most of the site's context and assets; and
 - To deliver wider community benefits.

Review of Green Belt (2008)

Major Developed Sites (MDS) Issues

- 6.11** In terms of the Orchard Hill MDS two applications have been submitted and considered by the Council: a full application for a new 7 form entry secondary school and an ASD unit to replace Stanley Park High School and an outline application for access only to be considered in detail for the development of part of the Orchard Hill site to provide up to 246 dwellings and a retail unit.
- 6.12** An application was submitted in 2007 for the redevelopment of the former BIBRA site for a Gospel Hall and two 4-bed houses and twelve 5-bed houses. The application was refused at the Development Control Committee in April 2008 and subsequently an appeal was considered in June 2009 (APP/P5870/A/08/2089586). The appeal was dismissed by the Inspector in a decision dated August 2009 on the grounds that: The proposals are inappropriate in the Green Belt and is therefore by definition harmful

(PPG2 para 3.2); the development would also have a negative effect on the openness of the green belt thus harming the character and appearance of the locality; and further harm would arise from the provision of housing on a site with poor pedestrian accessibility to public transport and services/facilities. Finally, other considerations submitted by the applicant were considered not to amount to the very special circumstances sufficient to outweigh the harm to the green belt.

- 6.13** Finally it should be noted that the Inspector reporting on the Examination in Public into the soundness of the Core Planning Strategy concluded (September 2009) that this site should be identified as an MDS. However, given the difficulties over redevelopment options highlighted by the Inspector into the S78 appeal and the charitable status of the Brethren it is considered that the best way to progress a sustainable and suitable development of this site would be through the development of a planning brief.

Metropolitan Open Land (MOL)

Background

- 6.14** 530ha of open space in the Borough are designated as MOL in the adopted Sutton UDP. There are currently 21 sites designated as MOL on the basis of their strategic significance for meeting one or more of the MOL criteria. The sites are listed in the UDP and identified in the 2006 Report of Studies.
- 6.15** Metropolitan Open Land (MOL) is strategically important open space, which is of metropolitan significance in terms of openness, leisure, recreation, sport, landscape, nature conservation or heritage; or forms part of a Green Chain which meets one of the other criteria. The Mayor's 2008 London Plan is clear that although MOL may vary in size and primary function in different parts of London, it should be of strategic significance to merit continued designation. The status of MOL is the same as Green Belt in terms of protection from development and serves a similar purpose.
- 6.16** There is no presumption against reviewing MOL boundaries in National Guidance. PPG2 however makes it clear that such reviews should be undertaken when development plans are being prepared and changes should be justified on the grounds of exceptional circumstances. The Mayor is clear that the boundaries of MOL should only be altered in exceptional circumstances and alterations should be undertaken through the development plan process in consultation with the Mayor (Policy 3D.10 of the 2008 London Plan).
- 6.17** The previous Reports of Study should be referred to for the history of the review of boundaries as part of the development of the adopted Sutton UDP. The previous reviews of MOL were taken in the context of progressing strategic development on MOL within the Borough including the redevelopment of the Roundshaw housing estate and the development of Sutton Arena and Sutton Tennis Centre.

Review of MOL Boundaries (2006)

- 6.18** As part of the preparation of the Core Planning Strategy: Issues and Options Report, the Council re-assessed the MOL in the Borough and it was considered that the sites currently identified continue to meet criteria for designation. There was however one contextual issue which required an updated assessment of MOL boundaries and which it was considered may result in the need for boundary amendments: the new

and significant built waste sorting facilities to the east of Beddington Farmlands. The Council considers that this development has a negative impact on the openness of the Beddington Farmlands site and significantly affects the contribution that this land makes by being clearly distinguishable from the built up area.

- 6.19** In further evidence gathering it was decided that the Council will also need to consider reviewing MOL boundaries having regard to development needs. It was also recognised that the Council might have to review the need for the use of MOL at St Helier for the development of a critical care hospital, however the Sutton and Merton Primary Care Trust had not finalised the decision over site location.

Review of MOL Boundaries - 2007

- 6.20** In preparing the Core Planning Strategy: Preferred Options document and the Site Development Policies: Issues and Options document and having regard to development needs and the pressures for development arising from consultations with landowners/developers and other stakeholders, the Council considered a further review of MOL boundaries should be undertaken in particular at the following locations:

Reigate Avenue Recreation Ground

- 6.21** Since the 2006 review of MOL boundaries an application had been approved, subject to a legal agreement, for the development of an Autism Spectrum Disorder Unit at Glenthorne High School, which encroaches onto MOL. Whilst it was considered that a minor boundary change could be made to reflect this decision once the planning permission has been granted it is understood that through the review of secondary school provision further applications may be forthcoming on a number of sites. Therefore it would not be appropriate to take a piecemeal approach to school boundary reviews at this stage but wait until a comprehensive review be undertaken.

St Helier Open Spaces

- 6.22** The previous Report of Studies identified that the use of MOL north of St Helier Hospital for the development of a Critical Care Hospital should be considered. However, the Sutton and Merton Primary Care Trust has now indicated¹ that no additional land over and above the present hospital site would be required for future developments. A review of the MOL boundary of the St Helier Open Spaces is therefore no longer required.

Beddington and Kimpton SILs

- 6.23** The Core Planning Strategy: Preferred Options document proposed a Spatial Strategy of 'Balanced Sustainable Growth', a key element of which is the development of Hackbridge as a sustainable neighbourhood involving comprehensive redevelopment within the Hackbridge area to provide a District Centre and a sustainable mix of homes, businesses, shops and community and leisure facilities.

- 6.24** It was anticipated that the extent of the development required to achieve the creation of the sustainable neighbourhood at Hackbridge included between 1,000-1,100 homes; the expansion of Hackbridge local centre into a district centre including the development of additional convenience retail and a range of services and facilities, notably a health centre, to meet the needs of existing and additional residents in the

¹ Better Health Care Closer to Home: Report to Joint Overview and Scrutiny Committee, Sept 2007

area; the development of additional primary school provision; and the development of a community hub facility. The Hackbridge sustainable neighbourhood proposal has received widespread support from the local community and other stakeholders.

- 6.25** However in order to achieve this scale of development, the Core Planning Strategy: Preferred Options recognised the need to allow for mixed use of a number of established industrial areas within the Hackbridge area. Consequently, the Core Planning Strategy identified an overall shortfall of employment land and accordingly proposed the de-designation of MOL adjacent to two existing SILs in Sutton: Land North of Kimpton (1ha) and three parcels of land west of and contiguous with Beddington Lane (approximately 16ha)². This approach proposed the consolidation of investment of industry in the Borough's most important employment locations. Focusing the replacement employment land at the two SILS would also appear to meet the Mayor's objective of promoting and managing SILS and optimising their importance as economic areas.

Land North of BedZED

- 6.26** In order to achieve the development of the Hackbridge sustainable neighbourhood the Core Planning Strategy: Preferred Options document proposed the de-designation of approximately 7 ha of MOL north of BedZED for residential, community and open space uses.

Land West of Sutton Cemetery

- 6.27** The Core Planning Strategy: Preferred Options document also proposed the de-designation of 0.8ha of land west of Sutton Cemetery and at the rear of Ridge Road for housing.

Conclusions

- 6.28** The Core Planning Strategy: Preferred Options identified MOL de-designations at 6 sites, involving the loss of approximately 25ha of MOL.

Review of MOL Boundaries – 2008

Introduction

- 6.29** A number of respondents, including the GLA, the London Development Agency (LDA), the London Wildlife Trust and Mitcham Common Conservators, expressed concern over the loss of MOL as proposed at Beddington Farmlands, adjacent to the Kimpton Industrial Estate and at Hackbridge. The grounds for objection included: the permanent loss of open space; loss of Sites of Importance for Nature Conservation; impact on the Wandle Valley Regional Park; and insufficient evidence of exceptional circumstances to justify the loss of open land. Furthermore, the GLA objected on the grounds that the allocation of MOL for other uses is not in general conformity with the London Plan. Finally, the LDA considered that there should be further evidence to justify the loss of Established Industrial Locations to other uses, as it is this that is leading to the need to de-designate MOL.
- 6.30** In terms of the need for employment land provision it was clear that there was a dichotomy of opinion over the expansion of the SILs between groups such as the GLA, the LDA, the London Wildlife Trust and Mitcham Commons Conservators, that are generally opposed to the corresponding loss of MOL, and private

² Part of this area, Site B3, was a site suggested by stakeholders for consultation.

developers/landowners (including Country Land Ltd, Development Planning Partnership and Sterecycle Ltd) who were in support of the approach.

- 6.31** Sterecycle Ltd and Country Land Ltd welcomed the amendment of SIL boundaries justified, amongst other things, on the need to enable the development of additional waste management facilities. However, Sterecycle Ltd indicated that the scale of the proposed land release at Beddington would be insufficient to meet employment and waste management needs and accordingly a much larger area of land should be identified. Furthermore, Country Land Ltd was concerned about potential dual designation of SIL and Sites of Importance for Nature Conservation (SINC) and Green Chains. This is, in its view, a conflict of designations and it considered that SINC status should align with any retained MOL boundary.
- 6.32** In considering these representations, the Council indicated that further evidence gathering would be undertaken regarding:
- The need for the development in the context of employment land supply and demand, including land to meet waste management requirements, and the need to meet housing needs, and, would review the availability of alternative sites within the urban area to meet such needs;
 - The need to assess the impact of de-designation on remaining MOL to continue to meet criteria for designation;
 - The intrinsic nature conservation value of sites and implications of de-designation for wider SINC;
 - The impact any de-designation would have on the Council being able to meet its Open Space Standard;
 - The impact of any de-designation on the Wandle Valley Regional Park; and
 - Any incidental advantages/benefits resulting from de-designation.
- 6.33** Following these reviews the Council decided not to progress with the range of de-designations identified in the Core Planning Strategy Preferred Options document. Consequently the Submission document indicated that there would be: no changes to the MOL boundaries at Reigate Avenue, land west of Sutton Cemetery and St Helier Open Spaces (i.e. these sites would remain as MOL in their entirety); the land north of Kimpton (1ha) and Land North of BedZED (7ha) would continue to be identified for de-designation as MOL in order to bring about the objectives of Sustainable Balanced Growth and the development of the Hackbridge Sustainable Suburb; and finally there would be boundary changes at the Beddington SIL taking into account the results of the MKA Ecological Study which would reduce the amount of land identified for de-designation as MOL considerably.
- 6.34** The exceptional circumstances, which, in the council's opinion, justified the de-designation of MOL, were based on the outcome of the reviews identified above and are set out in detail in the Report of Studies 3: Core Planning Strategy Proposed Submission (November 2008) and in the Council's Statement of Case LBS/Issue 1.3.3 'Very Special Circumstances'.

The Core Planning Strategy: Examination in Public(2009)

- 6.35** Finally, it should be noted that the Inspector reporting on the Examination in Public into the soundness of the Core Planning Strategy concluded (September 2009) that the circumstances put forward by the Council were not sufficiently "exceptional" in order to justify the de-designations sought. Therefore all references to the de-

designations should be removed from the Core Planning Strategy; references to the range of proposed uses to the affected sites should also be deleted; and consequential changes should be made, for example, to the Proposed Amendments to the boundaries shown on the Proposals Map.

- 6.36 Accordingly, none of the sites which had been proposed for de-designation as MOL in the Core Planning Strategy Submission document have been de-designated.

Other Open Spaces

Background

- 6.37 There are over 500ha of public open space with unrestricted access, on 244 sites within the Borough which consists of:

- 2 Metropolitan Parks providing a total of 125.99 ha;
- 3 District Parks providing a total of 80.32 ha;
- 36 local parks providing a total of 217.84 ha
- 203 small areas of public open space providing a total of 93.86 ha.

- 6.38 The Council has undertaken two significant reviews of open space. The first was completed in 1997 and was undertaken by Llewelyn Davies in accordance with best practice advocated by Llewelyn Davies and the former London Planning Advisory Committee. The second assessment, completed in 2005, updated results on supply and demand for open space, reviewed quality and value of a range of open spaces, and looked at the implications of the boundary reviews. It was prepared to provide evidence for the Core Planning Strategy: Issues and Options and the preparation of an Open Space Strategy in accordance with the Greater London Authority Guide to Preparing Open Space Strategies (GLA, March 2004). The results of both studies are set out in detail in the 2006 Report of Studies and are summarised below.

Open Space Study (Llewelyn Davis, 1997)

- 6.39 Llewelyn Davis undertook a review of open spaces and recreation facilities as part of the preparation of the adopted Sutton UDP. The results of the research suggested that Sutton was less well provided with public open space, in quantitative terms, than expected. Quantitative deficiencies, relative to land area and population, were particularly evident in Cheam South, St Helier South and Wallington North. However overall the ratio of residents to public open space is higher than the London average and significantly above that of other comparable boroughs in Outer London.
- 6.40 The research concluded that Sutton West, Sutton Central, Worcester Park North and Rosehill wards should be identified as priority landscape improvement areas.
- 6.41 The creation of the Wandle Valley Country Park was seen by Llewelyn-Davies as the most significant opportunity to create a major new space to meet the recreational needs of the Borough, but the report recognised the financial difficulties in the creation of the Park and recommended that some facilitating development be allowed on the fringes of the MOL at Beddington to enable the scheme to go ahead.

Open Space Study, Scott Wilson (2005)

- 6.42 Scott Wilson undertook a study into the supply, deficiency, quality, demand and use of open space in the Borough, and suggested recommendations for managing the Borough's open space. This Study and subsequent recommendations were used to prepare the Open Space Strategy (2007).

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- 6.43** Whilst the current Borough-wide level of open space with unrestricted public access exceeds the National Playing Field Association standard, the amount of open space varies widely between Wards. The lowest quantity is found in Wallington South and Sutton South with 0.14 and 0.15ha of open space per 1,000 population respectively. At the upper end of the scale, Beddington North, Beddington South and Carshalton South & Clockhouse have over 6 Ha per 1,000. Two thirds of Sutton's wards fall below the Borough Average of 2.88ha per 1,000 population.
- 6.44** A high proportion of the Borough has access to at least one open space of Metropolitan importance. Although there are deficiencies in access to spaces of Metropolitan importance in parts of the north, central and southern areas of the Borough, it is unlikely that there are any opportunities to create additional Metropolitan sites. The Study concludes that the following areas are deficient in both Metropolitan and District level provision:
- St. Helier (north west portion);
 - Stonecot (north east portion);
 - Sutton North (majority of ward);
 - Sutton Central (central portion running north south); and
 - Carshalton South & Clockhouse Ward (southernmost area).
- 6.45** The deficiency in access to Metropolitan Parks, District Parks and Local Parks is illustrated in the Appendix to the Site Development Policies DPD: Proposed Submission document (Maps 2.4-2.6).
- 6.46** The Study identified that the following key areas are deficient in Access to Local or Small Local Open Spaces however they have differing issues and therefore require different specific recommendations which are set out in the 2006 Report of Studies: Beddington North; Cheam; Sutton Town Centre; and Wallington South.
- 6.47** Analysis of access to play facilities shows that there is an uneven distribution of play with good coverage for all ages in the north, and poor coverage in the south of the Borough. There are also Wards with clusters of play facilities where Scott Wilson indicated that rationalisation might be an option, to provide fewer, better facilities. Maps showing access to play are set out in the Open Space Strategy (2007).

Urban Green Space

Background

- 6.48** Urban Green Space (UGS) is described in the Sutton UDP as land which may have restricted public access but which has an important recreational or non-recreational value. This can include private sports clubs, which can contribute towards meeting local/regional recreational needs for their members and often have significant visual amenity and ecological benefits within the surrounding area. As well as amenity or ecological value other non-recreational benefits include structural value, (i.e. open spaces that help define Sutton's distinctive communities), and educational or cultural value. Open space which meets either the recreational or non-recreational criteria and is located in areas of open space deficiency, or areas generally with a low proportion of green space to built up area, should be identified as UGS.
- 6.49** Currently 45 sites are identified as UGS in the UDP.

Review of UGS (2007)

- 6.50** A review of all UGS was carried out in 2007 in the context of the definition of open space deficiencies in the Open Space Study carried out by Scott Wilson in 2005. Sites were considered to meet an open space deficiency if: the ward they fall within is below the borough average for open space; the site does not have access to a metropolitan site; the site does not have access to a district site; the site has a deficiency in access to small open spaces; and, if the site has a deficiency in access to local parks. Scott Wilson assessed the value of a number of sites based on context; level and type of use; and the wider benefits of a site. Where this value calculation has been undertaken on UGS the results have also been reported.
- 6.51** The result of the review of UGS land is set out in the 2007 Report of Studies. Having carried out the analysis it appeared that two sites no longer meet any of the criteria: the Women's Cricket Club/BT site at Plough Lane; and Mill Green Allotments.

Allotments

Background

- 6.52** There are 35³ Council-owned allotments sites, with over 2,300 plots in the Borough. These are listed in the Schedule in Table 6.1 at the back of the document. Of these sites six are non-statutory. The majority of allotments are located across the north-eastern and central part of the Borough, serving many of the higher density housing areas. A number of Wards do not have any allotment provision at all, including Belmont, Carshalton Central, Wallington South, Beddington South and St Helier North.
- 6.53** There are no privately owned allotments, although until recently there was one at Aultone Way, Sutton Garden Suburb. The owners closed the site in anticipation of residential development for 28 houses. The application (Ref. APP/A/98/29815) was refused in July 1998.
- 6.54** There has been a dramatic increase in the desirability of allotment gardening and a corresponding increase in the uptake of allotments.

Revised Sutton UDP (2003)

- 6.55** An assessment of the supply and demand for allotments was undertaken as part of the review of the Sutton UDP. The assessment looked at quantity, quality and distribution of provision as well as identifying the catchment areas of current sites. It also looked at the uptake of plots, the number of sites with waiting lists and analysed the reasons for these waiting lists and looked at the distance travelled by plot holders to their sites. The results are set out in the Statement of Council's Case No 6: Allotments Policies, Sutton UDP Review: Public Local Inquiry (April 2001).
- 6.56** Research in 2001 identified that in relation to the standards in the Thorpe Report, the London Borough of Sutton was well provided for in terms of its allotment provision. Given the number of plots identified in 2001, there were 12.6 plots per 1,000 population.

³ The 2007 Report of Studies had identified 36 sites however Greenshaw Farm is no longer used as an allotment site

6.57 The Council was ranked ninth out of the 33 London Boroughs in terms of level of allotment provision, and, of the outer south west London Boroughs (Croydon, Sutton, Merton, Richmond and Kingston) it ranked second (LPAC Borough Council's Questionnaire, 1994).

Open Space Study, Scott Wilson (2005)

6.58 The Open Space Study conducted by Scott Wilson looked at the value and quality of a number of the allotments and identified nine allotment sites within the Borough that scored Poor for Quality and Low for Value. Scott Wilson recommends that both the Quality and Value should be improved. Scott Wilson also recommends that an Allotment survey be carried out into the demand, quality and use of allotments. This review was obviously undertaken during a period of lower demand. An updated review would be likely to identify that quality and value would now be higher.

Review of Supply and Demand of Allotments (2009)

6.59 Figures identifying supply and demand for allotments and take up rate for individual sites are set out in Table 6.1. Monitoring has been undertaken since 2001 although Table 6.1 just sets out the position since 2003. It is clear from these figures that there has been resurgence in the demand for allotments. Whereas in 2001 there were only waiting lists for eight allotments, 34 sites now have waiting lists and the numbers on the waiting lists has increased to 773 people. Furthermore there are now no vacant and available plots across the Borough and this considerable change in position does not reflect the fact that an additional 154 plots have been created on exiting sites.

Biodiversity

Introduction

- 6.60** There are a number of statutory designations for wildlife sites within the European Union e.g. Site of Special Scientific Interest, National Nature Reserve, Special Area of Conservation, Special Protection Area, Ramsar Site. Below this tier of statutory designations is a system of locally valued non-statutory sites. A Site of Importance for Nature Conservation (SINC) is a non statutory designation used to identify high quality wildlife sites in the borough. There are different tiers of sites: Sites of Metropolitan Importance; Sites of Borough Importance Grade I; Sites of Borough Importance Grade II; and Sites of Local Importance. Sites can be upgraded from e.g. Borough Grade I to Grade II if positive conservation management contributes to their overall improvement of nature conservation value. Conversely, sites can be downgraded if their nature conservation value reduces.
- 6.61** The 2009 Report of Studies 3 set out the results of a GLA survey of open space and wildlife habitat in Sutton as part of the Mayor's 10-year rolling programme and consequently the boundary amendments and additional SINC's proposed are identified in the Site Development Policies: Proposed Submission Appendix Maps 2.7-2.18.
- 6.62** The Council also commissioned consultants MK Ecologists to specifically review for ecological value a number of sites that make up the Beddington Site of Metropolitan Importance (MOL). The outcome of these results are summarised in the Council's Statement of Case LBS/Issue 1.3 on the biodiversity.

The Core Planning Strategy: Examination in Public (2009)

- 6.63** The Inspector reporting on the Examination in Public into the soundness of the Core Planning Strategy concluded (September 2009) that the de-designation of three of the SINC's (two at Beddington Farmlands and at Land North of BedZED) was only as a direct consequence of their proposed de-designation as MOL and since he was recommending the retention of MOL "it follows that the reason for de-designating the parcels as SINC's has no basis and cannot be supported". The final area of land proposed for de-designation as a SINC in the Core Planning Strategy Submission document was a small parcel (0.91ha) north of Mile Road which was being used for waste management operations and has a dual designation for industrial uses and SINC. The Inspector did not support the de-designation of this SINC on the grounds that it would condone an unauthorised use notwithstanding that the council was negotiating on regularising the planning position on this site.
- 6.64** Accordingly, none of the sites which had been proposed for de-designation as SINC's in the Core Planning Strategy Submission document have been de-designated.

Countryside Conservation Area

- 6.65** The GLA has recommend the identification of a Countryside Conservation Area at the Oaks Park, Woodcote Park Estate and the smallholdings following the procedures in Appendix 1 of the Mayor's Biodiversity Strategy and in order to reflect that the wildlife value is diffused throughout the whole area in features such as hedges and ditches. It is recommended that this proposal be considered through the preparation of a Supplementary Planning Document.

'Areas of Deficiency' in Access to Nature

- 6.66** Areas of Deficiency in Access to Nature are defined as built-up areas more than one kilometre actual walking distance from an accessible Metropolitan or borough site. The GLA has identified such Areas of Deficiency and a list of priority sites where opportunity exists to improve access to experience wildlife, and contribute towards the Mayor's strategic target to reduce "Areas of Deficiency" in access to nature.
- 6.67** The 2006 GLA survey of Sutton has identified some sites as List 1: Priority opportunities to reduce areas of deficiency in access to nature. Map 6.17 identifies these sites within Sutton that offer priority opportunities to reduce areas of deficiency in access to nature. Access improvements to these sites will contribute to the Mayor's strategic targets for restoration and recreation of priority habitats for biodiversity, as set out in the London Plan and as recommended in PPS9.

Table 6.1: Council Owned Allotment Sites

Allotment Name	Total plots Oct 09	Vacant plots Nov 03	Vacant plots Sept 06	Vacant plots Sep 07	Vacant plots Sep 08	Vacant plots Oct 09	Waiting list Sep 08	Waiting List Oct 09
Beddington Park	14	0	2	0	0	0	Yes (6)	Yes (10)
Belmont	137	6	0	0	0	0	Yes (42)	Yes (38)
Benhill	170	0	0	0	0	0	Yes (39)	Yes (45)
Buckland Way	98	32	21	9	0	0	Yes (7)	Yes (15)
Bushey Meadow	23	6	3	3	1	0		Yes (13)
Bute Road	111	31	28	18	0	0	Yes (10)	Yes (28)
Central Road	12	0	0	0	0	0	Yes (13)	Yes (19)
Chaucer Road	36	27	24	14	5	0		Yes (7)
Cheam Court (A&B)	31	0	0	0	0	0	Yes (13)	Yes (38)
Cheam Park Nursery	69	0	0	0	0	0	Yes (24)	Yes (39)
Cheam Park Paddock	19	0	0	0	0	0	Yes (20)	Yes (32)
Culvers Avenue	22	0	0	0	0	0	Yes (13)	Yes (21)
Demesne Road	281	129	109	91	54	0		Yes (19)
Duke Street	27	0	0	0	0	0	Yes (14)	Yes (19)
Fryston Avenue	23	0	0	0	0	0	Yes (7)	Yes (7)
Gander Green Lane	219	56	26	3	0	0	Yes (14)	Yes (35)
Goose Green	64	9	3	3	0	0	Yes (2)	Yes (8)
Green Wrythe Lane	119	38	31	12	0	0	Yes (24)	Yes (40)
Lavender Road	20	0	0	0	0	0	Yes (24)	Yes (32)
Mill Green	21	3	4	0	0	0	Yes (4)	Yes (11)
Perretts Field	59	0	4	0	0	0	Yes (26)	Yes (29)
Priory Crescent	6	0	0	0	0	0	Yes (9)	Yes (15)
Pylbrook Triangle	2	2	2	2	0	0		Yes (3)
Ridge Road	63	24	21	20	13	0		Yes (11)
Roundshaw	107	12	0	0	0	0	Yes (17)	Yes (23)
Spencer Road	58	8	4	3	0	0	Yes (10)	Yes (16)
Stanley Road	208	70	56	29	0	0	Yes (25)	Yes (55)
The Warren	15	15	0	0	0	0	Yes (40)	Yes (39)
Wandle Road	30	4	0	0	0	0	Yes (4)	Yes (8)
Wandle Side	14	0	0	0	0	0	Yes (7)	Yes (11)
Watson Avenue	26	3	4	6	2	0	Yes (4)	Yes (10)
Westmead Road	176	50	32	11	0	0	Yes (15)	Yes (45)
Wrights Row	13	0	0	0	0	0	Yes (25)	Yes (31)
(Clensham Lane)	3	N/A	N/A	0	0	0		Yes (1)
(Bute Road Orchard)	5	N/A	N/A	0	0	0		
	2301 (2147 in '03)	677	372	224	75	0	28 (458)	34 (773)