

London Borough of Sutton

Sutton Draft Local Plan Consultation Form



The consultation is open from **18 June 2026** to **11.59pm on Friday, 31 July 2026**.

To make formal responses ('representations') or detailed comments on the draft Local Plan, the Council welcomes responses by:

- a) Completing the Council's online consultation at <https://sutton.citizenspace.com/environment/draft-sutton-local-plan-2024-to-2041>
- b) Sending this form, by email or post to the addresses below;
- c) Sending your comments by email to planningpolicy@sutton.gov.uk;
- d) Sending your comments by letter to: Strategic Planning Manager (Local Plan), London Borough of Sutton, Civic Offices, St Nicholas Way, Sutton SM1 1EA.

The Local Plan and its related documents can all be downloaded from Section LP1 of the Local Plan Evidence Base, at:

<https://www.sutton.gov.uk/planning-and-building/planning/planning-policy/draft-local-plan-evidence-library>

Note: if emails and/or attachments and letters include objections, please say clearly which part(s) of the local plan your objection refers to, and why the objection is being made. Use this form and the attached guidance note for further information on how to draft your comments or representations.

This form has three parts:

- Part 1 – Personal Details
- Part 2 – Your representation(s). Please fill in a separate sheet for each representation you wish to make.
- Part 3 - A short guidance note on the process and factors to take into account when making representations (also available to download separately).

Privacy

To ensure the next stage of the Draft Plan process (Examination by a Planning Inspector) is effective and fair, it is important that the Examiner (Planning Inspector) and other participants know who has made representations on the Plan. The London Borough of Sutton will therefore ensure that the names of those making representations can be taken into account by the Examiner. For this reason, **anonymous comments cannot be accepted**.

By submitting a response to this consultation, you agree to your information and representations being provided to third parties in connection with the Draft Local Plan's examination stage. Names and contact details will not be visible on our website, although they will be shown on paper copies that will be sent to the independent examiner and available for inspection. Your information will be retained by the Council for two years in line with its retention schedule and privacy policy.

Part 1 - Personal Details

1. Are you responding on behalf of yourself or someone else (as their agent)? (mark X in the appropriate box)

Myself ☐

Another person, company or organisation ☐

If you are responding on behalf of another person, company or organisation, please complete your details below, and your client's details in Part 1A.

2. What is your name?

3. What is your email address?

4. Job Title and Organisation (*optional - please only complete this question if you are commenting in a professional capacity*)

5. Address

6. Phone number (*optional*)

Part 1A - Your client's details

Please provide details of the person, company or organisation you are representing.

1. Name of person, company or organisation

2. Address

3. If you are responding on behalf of a group or organisation, please indicate how many people your response represents, and how the response has been authorised.

Part 2 – Your Representations

Please note - your representation should cover as briefly as possible all the information, evidence and supporting information you believe is necessary to support/justify your representation, and any changes you have suggested. Refer to the Guidance Note at the end of this form for further information.

After this consultation stage on the Draft Local Plan, further responses/information will only be requested by the Inspector, based on any matters and issues he/she identifies for examination.

Please use a separate sheet for each representation. If you are making more than one representation, please copy and paste questions 1-6 onto a new page as many times as required.

1. To which part of the Local Plan does this representation refer? (mark with X all that apply)

Draft Local Plan	☐	Sustainability Appraisal	☐
Changes to the Policies Map	☐	Local Plan Appendix	☐

2. Please indicate the paragraph(s), policy(policies) or map/schedule(s) that this representation refers to.

3. Do you consider this part of the draft Local Plan to be (mark with X):

	Yes	No
1. Legally Compliant	☐	☐
2. Sound	☐	☐

If you have entered **No** to 3.2 above, please continue to Question 4. Otherwise, please go to Question 5.

4. Do you consider this part of the draft Local Plan to be unsound because it is:

1. Not Positively Prepared (it is not based on a strategy which seeks to meet objectively assessed development and infrastructure requirements)	☐
2. Not Justified (it is not the most appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base)	☐
3. Not Effective (the Plan is not deliverable over its proposed 15-year length and is not based on effective joint-working on cross-boundary strategic priorities)	☐

4. Not Consistent with national policy

☐

5. Please give details of why you consider the draft Local Plan is not legally compliant, is unsound or fails to meet the need to maintain effective co-operation. Please be as precise as possible.

If you wish to support the legal compliance, soundness of the Local Plan or compliance with the need to maintain effective co-operation, please also use this box to set out your comments.

6. Please set out what change(s) you think are needed to make the draft Local Plan legally compliant or sound, taking into account the test of soundness you have identified in the question above (Positively prepared/Justified/ Effective/ Consistent with National Policy) where this relates to soundness. You will need to say why this change will make the Local Plan legally compliant or sound. It will be helpful if you can suggest some revised wording of any policy or text. Please be as precise as possible.

7. If your representation is seeking a change, do you consider it necessary to take part in the oral part of the hearing (the 'examination') with the Planning Inspector?
(mark X as appropriate)

No, I do not wish to take part in the oral examination ☐

Yes, I wish to take part in the oral examination ☐

8. If you have answered Yes to Question 7, please outline why you consider this to be necessary:

Please note- Participation at the hearing is entirely at the discretion of the Inspector, who will decide the most appropriate procedure to adopt. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

Signature:

Date:

Sutton Local Plan Consultation, 18 June - 31 July 2026

Guidance note for representations and other responses

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Introduction

This consultation is the second and final stage of the Council's Local Plan consultation process before the draft Plan is submitted to the Government for examination by a Planning Inspector. It is carried out under Regulation 19 (Reg19) of the Town and Country Planning Act (Local Planning) (England) Regulations 2012 and its 2026 successor¹.

The Draft Local Plan documents

The Local Plan and its related documents (Sustainability Appraisal, Local Plan Appendix and Changes to the Policies Map) can all be found in Section LP1 of the Local Plan Evidence Base, at:

<https://www.sutton.gov.uk/planning-and-building/planning/planning-policy/draft-local-plan-evidence-library>.

Further information on the Sutton Local Plan review can be found at <https://www.sutton.gov.uk/w/localplanreview>.

Responding to the consultation

Unlike the Regulation 18 consultation in 2024 which explored a number of different policy options and invited more open responses, comments in this consultation stage need to be more formal and technical, focussing strictly on Legal Compliance and the four Tests of Soundness (positively prepared, justified, effective, and consistent with national policy) as set out below. It is not possible to revisit the wider options discussed in the previous consultation. All feedback received will be submitted to the Inspector alongside the draft Local Plan for their consideration.

General advice for making Representations or further comments

¹ <https://www.legislation.gov.uk/uksi/2026/186/regulation/19/made>

If you wish to make a representation seeking a change to the Plan or related documents, you should first make clear in what way you believe the Plan or part of the Plan is not legally compliant or sound, taking into account the compliance and soundness tests set out in more detail below.

Your representation should cover all the information, evidence and supporting information necessary to support/justify your comments and any suggested change, as there will not normally be a further opportunity to make additional comments. After this stage, further submissions will only be requested by the Inspector, based on the matters and issues he/she identifies for examination.

Representations supporting the Legal Compliance or soundness of the Plan are also welcome, including any suggestions to further enhance the compliance and/or soundness, and can be recorded in the open text boxes within the Council's online Citizenspace consultation or downloadable form. As above, please provide as much evidence and supporting information as possible to support your proposal.

Requirements for Legal Compliance

At the Examination, the Inspector will first check that the Plan meets the legal requirements under the relevant legislation (s20 (5) (a) of the Planning and Compulsory Purchase Act 2004²) before moving on to test it for soundness.

You should consider the following grounds before making a representation on legal compliance. These grounds are very specific and are set out in the above Act as follows:

- The Draft Local Plan should be included in the current Local Development Scheme (LDS), and the key stages should have been followed. The LDS is a programme of work prepared by the Council, which sets out the Local Development Documents (LDDs) it plans to produce. The LDS will set out the key stages in the production of any Plans which the Council proposes to bring forward for independent examination. If the Plan is not in the current LDS, it should not have been published for representations. The LDS should be published on the Council's website (see <https://www.sutton.gov.uk/planning-and-building/planning/planning-policy/local-plan>).
- The process of community involvement for the Plan in question should be in general accordance with the Council's Statement of Community Involvement (SCI) (see <https://www.sutton.gov.uk/planning-and-building/planning/planning-policy/local-plan>). The SCI sets out the Council's strategy for involving the community in the preparation and revision of LDDs (including Plans) and the consideration of planning applications.
- The Plan should comply with the Town and County Planning (Local Planning) (England) Regulations 2012 (the Regulations) (now succeeded by The Town and Country Planning (Local Planning) (England) Regulations 2026). On publication of the Draft Local Plan, the Council must publish the documents required in the Regulations, and make them available at its main offices and on its website (see link

² <https://www.legislation.gov.uk/ukpga/2004/5/section/20>

above). The Council must also notify the Local Plan bodies (as set out in the Regulations) and any persons who have requested to be notified.

- The Council is required to provide a Sustainability Appraisal Report when it publishes a Draft Local Plan. This should state the process used to carry out the Sustainability Appraisal, the baseline information used to inform the process, and the outcomes of that process. The Sustainability Appraisal is a tool for ensuring that policies reflect social, environmental, and economic factors.
- In London, the Plan should be in general conformity with the London Plan (the Spatial Development Strategy)³.

Requirements for Soundness

Soundness is explained in paragraph 36 of the National Planning Policy Framework (NPPF)⁴. Plans are 'sound' if they are:

- a) **Positively prepared** – provides a strategy which, as a minimum, seeks to meet the borough's objectively-assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- b) **Justified** – is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- c) **Effective** – is deliverable over the full period of the Plan and is based on effective joint-working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by Statements of common ground agreed between the Council and neighbouring authorities; and
- d) **Consistent with national policy** – enables the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

If you think the content of the Plan is not sound because it does not include a policy where it should do, you should go through the following steps before making representations:

- Is the issue you are concerned about already covered specifically by national planning policy (or the London Plan)? If so, it does not need to be included;
- Is what you are concerned about covered by any other policies in the Plan on which you are seeking to make representations or in any other Plan?
- If the policy is not covered elsewhere, in what way is the Plan unsound without the policy?
- If the Plan is unsound without the policy, what should the policy say?

³ <https://www.london.gov.uk/programmes-strategies/planning/london-plan/london-plan-2021>

⁴ https://assets.publishing.service.gov.uk/media/67aafe8f3b41f783cca46251/NPPF_December_2024.pdf

Maintaining Effective Cooperation

Some people wishing to make representations will be aware of the 'Duty to Co-operate' process introduced in the Localism Act 2011. In November 2025, the Government took the decision not to continue with Duty to Co-operate, thereby removing this requirement for plans in the current system.

However, councils are required to continue to collaborate across their boundaries, including on unmet development needs from neighbouring areas, and Planning Inspectors will expect to see evidence of authorities maintaining effective co-operation in line with national policy requirements of the NPPF. Producing robust evidence to demonstrate that effective co-operation on strategic matters of cross-boundary importance has been undertaken will still be key, as will the need to produce Statements of Common Ground with neighbouring authorities and key stakeholders. If you feel this has not been carried out across the plan or its related documents, please set out why you think this is the case.

Groups and other organisations

Where there are groups who share a common view on how they wish to see a Plan modified, it would be very helpful for that group to send a single representation which represents the view, rather than for a large number of individuals to send in separate representations which repeat the same points.

In such cases, the group should indicate how many people it is representing and how the representation has been authorised.

Participation at the Hearing (the 'Examination')

The consultation includes an option to say whether you wish to speak at the Examination. Participation is entirely at the discretion of the Inspector, who will determine the most appropriate procedure to adopt. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.