

Oxted & Limpsfield Residents

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Tandridge District Council
Council Offices
Station Road East
Oxted
Surrey RH8 0BT

Dear Mr Moore

Notice under Section 122(2A) Local Government Act 1972

Proposed appropriation of land forming open space at Bouthurst Way, Hurst Green, Oxted from amenity use to planning purposes.

I write on behalf of the Oxted & Limpsfield Residents Group to object to the proposed appropriation by Tandridge District Council of the open space at Bouthurst Way to facilitate housing development on the land for the following reasons:

1. To inform its new Local Plan and Wellbeing Space Strategy, the Council commissioned TSE Research in collaboration with Groundwork to carry out a detailed assessment of existing open space provision in Tandridge, and to review the qualitative and quantitative need for additional provision now and in the future.

The consultants' report makes clear that all the current open spaces in Tandridge are required to meet the needs of the existing population and that they should all be protected with a presumption against development.

In addition, it makes clear that any increase in the population would require the provision of more open space.

It highlights how important all the existing open spaces are to residents and to their well-being, commenting: "By far the most frequently expressed view found among residents is the vital importance of protecting the open space already available."

Therefore, if the Council proceeds with selling off this land for housing development it is in conflict with its own Local Plan evidence and is behaving unreasonably and unjustifiably.

2. The National Planning Policy Framework is clear about the role open space plays in delivering sustainable communities which promote health, wellbeing and improve people's quality of life.

The Council is in conflict with Paragraph 73 of the National Planning Policy Framework which states:

Paragraph 73. Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities. Planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision. The assessments should identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area. Information gained from

the assessments should be used to determine what open space, sports and recreational provision is required.

The Council has spent taxpayers' money on commissioning robust and up-to-date open space assessments but is ignoring the evidence the assessments have provided and is, in fact, acting contrary to that evidence. In so doing, it is behaving unreasonably and unjustifiably.

3. The Council is also in conflict with Paragraph 74 of the National Planning Policy Framework which states:

Paragraph 74. Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- *an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or*
- *the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or*
- *the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.*

4. As well as the open space at Boulthurst Way, the Council also proposes housing development on open spaces it owns at Chestnut Copse playing field, the Greenway, Hurst Green and at Barnfield Way, Hurst Green.

This is cumulatively a significant loss of open space in one area and exacerbates the conflict set out in points 1-3 above.

5. The Council is also proposing to sell off for housing development its land at nearby Warren Lane Depot, Hurst Green.

This is cumulatively a significant amount of new housing development in an area which already has an infrastructure deficit. The Council has made no consideration of the current infrastructure deficit nor of the future impact on infrastructure of its proposals for housing development on these four pieces of land.

6. There is a clear conflict of interest because the Council is both landowner and the planning authority which decides if its own land should be approved for housing development.

In addition, there is a clear financial motive for the Council to sell off its assets as it has acknowledged financial difficulties and has a predicted shortfall of £1.4 million in 2017/18.

It would be both premature and would seriously damage public confidence in the planning process for the Council to bring forward its own sites for development before completion of the Local Plan process, thereby avoiding due and proper consideration by the Planning Inspectorate.

The Council should be subject to the same process that any other landowner/developer is required to adhere to – that is it should submit any land it wishes to develop to the Local Plan process and the case for development of that land should be examined by the Planning Inspector conducting the Local Plan Examination in the light of all the evidence submitted by all parties to that Examination.

Yours sincerely

Catherine Sayer

Oxted & Limpsfield Residents Group