

Please reply to:  
The Hermitage  
Park View Road  
Woldingham,  
CR3 7DJ

8 November 2020

The Strategy Team  
Open Space Strategy  
Consultation  
Tandridge District Council  
Council Offices  
8 Station Road East  
Oxted, Surrey  
RH8 0BT



*Woldingham Parish Council*

Dear Strategy Team,

This is a joint representation from the Woldingham Association and the Woldingham Parish Council on the draft Tandridge District Council Open Space Strategy (“draft Open Space Strategy”).

This document contains two sections:

**Section 1:** Comments on the Woldingham Priority Action list.

**Section 2:** Comments on the district-wide objectives and priorities.

All of our suggested alterations to the draft Open Space Strategy are in bold-italics text and prefaced by the words Suggested Alteration.

### **Section 1: Comments on Woldingham Open Space Priority Actions list**

We would like to make four overarching comments on this list:

First, we regret to say that almost none of the facts in the list are correct. In particular:

- The Glebe, which is correctly labelled as “The Glebe: Cricket” in one row but incorrectly labelled “Woldingham Park” in another row despite it being the same area,
- The Glebe playground, which is incorrectly labelled as “Woldingham Play Space”,
- Great Church Wood, which is incorrectly labelled as “Church Road Woodland”,
- Marden Park Woods, which is incorrectly labelled “Marden Park”.

- One site (South Hawk[sic]) is incorrectly allocated to Oxted when it is located in Woldingham,
- Another site in Woldingham has been omitted from the Woldingham list, but included in Appendix 2 as being owned by “Warlingham CIC” when that is not the case. It is also incorrectly labelled Long Hill,
- A site is that is located in Whyteleafe (Wapses Lodge) has been incorrectly included in the Woldingham list, and
- the Woldingham Village Green is omitted from the Priority Actions list, but included in Appendix 2, page 85.

Most of the sites in Woldingham Parish are identified in the maps in the Woldingham Neighbourhood Plan and so it appears that neither the draft Open Space Strategy nor the 2017 Assessment have cross-checked these basic facts. We also could find no explanation as to why some sites have been included and others omitted.

Second, the sites listed are privately owned and we strongly believe that the draft Open Space Strategy should not seek to impose these initiatives on private landowners. Given that the draft Open Space Strategy will be approved by the Community Services Committee and funds provided by that Committee, we believe that the draft Open Space Strategy should focus on those spaces that fall under Community Services.

Third, the draft Open Space Strategy makes no mention of the fact that many of the spaces in the Woldingham list are located in the Green Belt, and some are also located in the Surrey Hills Area of Outstanding Natural Beauty (AONB). AONB is a national designation in recognition of the high quality landscapes and rich biodiversity of the Surrey Hills. Woldingham also has a Neighbourhood Plan which refers to open and green spaces in Woldingham Parish, and that has also not been incorporated into this list.

Fourth, the Introduction of the draft Open Space Strategy highlights the importance of maximising the biodiversity of open spaces. This is supported by references to government documents such as the 2014 Natural Environment White Paper. However, biodiversity has not been maximised because it has been included only as a secondary item in district objective number (4) (p. 16).

We strongly disagree with any initiative in Woldingham Parish that requires existing natural wooded areas to be “managed” as indicated in the Woldingham Priority Actions list and in the District-wide list (5), page 18. Woldingham Parish contains wooded areas of all types – natural as well as managed – all of which can be accessed via the existing extensive network of footpaths and bridleways that are enjoyed by recreational users of all types.

Natural wooded areas make a strong and unique contribution to the diverse flora and fauna of Woldingham Parish. These unique natural wooded areas should not be “managed” as indicated in the Priority Actions list because there are already many managed wooded areas in Woldingham Parish and elsewhere in Tandridge District.

Therefore it is crucial that these natural wooded areas remain intact so as to retain their rich biodiversity.

Lastly, felling trees, clearing areas for new pathways and tracks, brush cutting, are all the opposite of “maximising” biodiversity in our natural wooded areas. In addition, the Open Space Strategy specifies a mix of non-native/native tree species for tree planting despite it being well known that native trees support a greater and wider range of biodiversity. In some cases, the inclusion of non-native trees can be detrimental. All of this is contrary to the stated objective of enhancing or maximising biodiversity.

*Further detailed comments on the Woldingham Priority Action list table*

The “quantity shortfall/deficits” in the first two rows of this table have no regard for the priorities and objectives identified in the Woldingham Neighbourhood Plan. These should take precedence because:

- The Woldingham Neighbourhood Plan (WNP) is part of the Tandridge District Council adopted Development Plan, and
- the priorities and objectives in the WNP have been subject to extensive consultation, including the final referendum. This is a robust consultation process that has passed Examination.

In addition, the quantity/shortfalls identified may not even be correct given the inaccurate location and labelling in the draft Open Space Strategy.

Under the Woldingham School entry, there is no need for Woldingham School to also address the needs of “Oxted Hockey Club” because these needs are being addressed under the Oxted School: Football & Hockey Priority Actions entry. In addition, none of the initiatives, such as “provision of refreshments” appear to have regard for the fact that Woldingham School is a fee-paying school, located in the Green Belt and in the Surrey Hills AONB. Further, we believe that a Council document should not specify how a private landowners should manage their finances as shown in this row requiring Woldingham School to “*Ensure a sinking fund is in place for long-term sustainability*”.

“Marden Park” itself is located in the Surrey Hills AONB, which is covered by the Surrey Hills AONB Management Plan - a document which the draft Open Space Strategy does not mention.

In summary, the Woldingham Priority Actions list is comprised of open spaces on privately owned land that fall outside the remit of this draft Open Space Strategy. Further, the list:

- Does not reflect the needs and priorities of local residents as expressed in the Woldingham Neighbourhood Plan,
- Does not enhance or maximise biodiversity and some of the initiatives would be detrimental to biodiversity, and
- Contains factual inaccuracies in almost all of the entries.

***Suggested Alteration: For the reasons given above, we would like the Woldingham Priority Action List to be removed.***

## **Section 2: District-wide objectives and priorities**

We would like to make one overarching point:

In our view, the draft Open Space Strategy is an awkward collection of initiatives that fall within Planning Policy and others that fall within Community Services. We believe these should be separated because the draft Open Space Strategy contains a number of additional requirements for planning applications/obligations that cannot be used when deciding applications because these requirements are in the draft Open Space Strategy, and not in the emerging Local Plan policies or in the adopted Development Plan.

Emerging Local Plan Policy TLP38: Play and Open Space explains that “*All applications for development should accord with the Council’s most up to date Open Space Assessment and Corporate Open Space Strategy*”.

However, it was established at the emerging Local Plan Examination that planning policies could not require planning applications to be in accordance with documents outside of the planning system because these other documents are not required to be “sound” under the NPPF. Therefore, the draft Open Space Strategy cannot be used to set additional requirements for planning applications.

***Suggested alteration: All Planning Policy and Planning elements should be removed from the draft Open Space Strategy and moved to Planning Policy/Planning.***

## **5 Engagement**

We disagree with the conclusions of the residents survey summarised in this section and in Appendix 3 that the provision of kiosks and cafes in our open spaces is a high priority for Woldingham residents. Our Neighbourhood Plan survey indicated that the overwhelming priority of Woldingham residents is to protect the Green Belt, the AONB, the countryside, encourage wildlife and biodiversity. The provision of cafes and kiosks was not even mentioned. Cafes and kiosks increase litter and service requirements (e.g. bins, food waste). They can also be disruptive to the enjoyment of natural open spaces such as those typically found in Woldingham Parish. They are also likely to be contrary to planning policy.

***Suggested alteration: Include a sentence that explains that the Residents Survey in the draft Open Space Strategy does not supercede the surveys, needs and priorities identified in Neighbourhood Plans.***

## **6 Budgets and Funding**

We were pleased to see consideration of how the initiatives will be paid for. However, the numerous and wide-ranging initiatives in the draft Open Spaces Strategy appear to

assume that budgets are limitless when the reality is very different. Although a number of funding sources are listed, it would appear that the majority of the funding will come from council tax payers. Therefore, value for money and successful delivery will continue to be important and that should be more prominent in the document.

***Suggested Alteration: The actions identified in the draft Open Space Strategy should be more closely aligned with the limited budget available, the need to achieve value for money and successful delivery.***

#### *Revenue and Capital Expenditure*

***Suggested Alteration: We believe that the first priority for the 2021-2025 period should be to address the maintenance problems highlighted in these sections. The second priority should be to maintain Council fly-tip clearance to ensure that all open spaces remain enjoyable and safe. The third priority should be to complete the playground refurbishment programme.***

#### *Planning obligations*

Chapter 8 of the draft Open Space Strategy includes requirements for planning applications that are neither in the adopted Development Plan nor included in the submission emerging Local Plan Policy TLP38, as follows:

*“When provision is on site it should be maintained by the developer for 1 year and then by a management company. A management plan should be submitted and agreed as a planning condition.”*

Therefore, these additional requirements cannot be imposed on planning applications as they are not part of any planning policy.

***Suggested Alteration: We suggest that all of this is removed because it falls under Planning Policy.***

### **8 District wide recommendations**

(1) (2) and (3) ***Suggested Alteration: These should all be removed because they fall under Planning Policy.*** Monitoring of the provision of new burial sites is included as a “Relevant Monitoring Indicator” in emerging Local Plan Policy TLP40: Burial space. Such monitoring falls under Planning and not Community Services.

There is no mechanism in either Policy TLP38 or in the draft Open Spaces Strategy for determining how much open space should be provided on new developments. The “Playing Pitch Calculator” is not part of the adopted Development Plan nor has it been included in the emerging Local Plan Policy TLP39: Providing Playing Pitches and Built Leisure Facilities and so cannot be used to determine what “should” be provided with new developments.

(4) This is two distinct items grouped together: (4a) verge cutting and (4b) biodiversity. Verge cutting policy is part of Community Services. We have addressed the wider issue of biodiversity in Section 1.

***Suggested Alteration: Verge cutting should be a separate initiative which should include verges being cut at a time to encourage wildlife.***

(5) and (6) ***Suggested Alteration: This list of ideas should be sorted to only include those that fall within the remit of Community Services, and then that list prioritised. With regards to Tree Management, this text should be amended to include the encouragement of the natural regeneration of trees and woodland because this process maximises biodiversity.***

(14) ***Suggested Alteration: The consideration of Cafes and Outdoor Gyms should be separated from consideration of public conveniences, e.g. toilets and water.***

(15) ***Suggested Alteration: This should be amended so it is done at the Parish level.***

(19) and (20) ***Suggested Alteration: This should be removed because the preparation of these two Supplementary Planning Documents (SPD) falls under Planning Policy.***

In our view, these documents should be approved as soon as possible after adoption of the emerging Local Plan and not left to 2024/2025 as is proposed in the draft Open Space Strategy.

## **Conclusion**

We request that the Woldingham Priority Action list be removed because the list is factually inaccurate, the actions do not reflect the needs and priorities of local residents, the actions do not reflect Green Belt, Surrey Hills AONB or Local Green Space designations, some of the initiatives would be detrimental to both biodiversity and character, and all are on privately owned land which falls outside the remit of Community Services.

We also suggest that the Planning/Planning Policy elements be separated from the Community Services elements so as to ensure the correct focus can be placed on each element being successfully completed.

Thank you for the opportunity to comment.

Yours Sincerely,  
Geoffrey King, Chairman, Woldingham Association  
Deborah Sherry, Chairman, Woldingham Parish Council