Limpsfield Parish Council's Further Evidence to

Representation on behalf of The South London Church Fund and Southwark Diocesan Board of Finance

Re; Land at the Glebe Field and Glebe Meadow

1. Limpsfield Parish Council (LPC) thanks the South London Church Fund and Southwark Diocesan Board of Finance (referred to as the Diocese) for its careful consideration of the draft policy on Local Green Spaces sent for consultation as part of the draft Limpsfield Neighbourhood plan, and also for the two meetings held to discuss the proposals. The LPC notes that the Diocese has no current plan to develop the land, but does wish to support community facilities that may in the future be placed on the land. This response explains an amendment to the proposed policy to alleviate the concerns of the Diocese.

2. What are Local Green Spaces?

Local Green Space designation is a way to provide special protection for green areas of particular importance to local communities. The National Planning Policy Framework (NPPF) published in 2012 introduced the concept of Local Green Space (LGS) designation.

Paragraph 76 of the NPPF says that local communities should be able to identify green spaces of particular importance to them through local and neighbourhood plans. These designations would rule out development other than in very special circumstances and should therefore be consistent with the local planning of sustainable development, and be capable of enduring beyond the end of the plan period. Paragraph 77 of the NPPF recognises that the LGS designation would not be appropriate for most green areas and sets out criteria, as follows, for the designation of sites.

- where there is no agreed planning permission for housing development
- where the green space is in reasonably close proximity to the community it serves
- where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife
- where the green area concerned is local in character and is not an extensive tract of land.

'the green space is in reasonably close proximity to the community it serves'

The Glebe field is surrounded by the community it serves with short public footpath access from Detillens Lane and Granville Road. The Glebe Meadow has easy access from the village and St Peter's Hall.

'the green area is demonstrably special to a local community and holds a particular local significance'

When 90% of community respondents vote in favour of designation as a LGS it is clear that the area is special and holds particular local significance.

'the green area concerned is local in character and is not an extensive tract of land'.

The term 'extensive tract of land' is not defined, and for the Inspector to decide. The two proposed Local Green Spaces are within an urban area and completely surrounded by housing, rather than extending outwards from the village so they are undoubtedly 'local in character'.

3 The LPC is thus confident that the Glebe field and the Glebe Meadow both fulfil these criteria and the reasoning is clearly set out in the draft Neighbourhood Plan.

The Glebe and Meadow boundaries have remained largely unchanged since at least 1871 with an intact historical field pattern. Tandridge District Council's 'South of the Downs' plan of April 1986, which lasted for a decade, states that:

'The value of open land at Brook and Glebe fields in Limpsfield is recognised. It provides an open aspect for many residents and helps to preserve a measure of separation between Oxted and Limpsfield. It would not be appropriate to include it within the Green Belt as it is isolated from open countryside, but the following policy will apply: Land at Brook and Glebe field, Limpsfield, will remain in open use'.

- 4 Paras 5 and 6 of the Representation refer to Site 2 the Glebe Meadow. The LPC is aware that this meadow is privately owned by the Diocese and recently leased to St Peter's church for a period of 11 years. The stated aim of the church is that the Meadow should be available to the public for a variety of community purposes, including a children's football club and a recently erected portakabin for the PANDA nursery. This is the only area in Limpsfield which has space for such activities, thus enabling the public to benefit from this open space.
- 5 Paras 7 to 10 cover the possible community use of the land. The LPC is also keen to support community use of available and suitable spaces in Limpsfield.

'Very special circumstances'

Paragraph 76 of the NPPF provides flexibility in the application of Local Green Space policy but does not indicate what these circumstances might be. The same approach applies to Green Belt policy.

For the avoidance of doubt, the LPC has therefore amended the Neighbourhood Plan LNP 8, for all the proposed Local Green Spaces, as follows:

Proposals for development on the designated land will not be supported unless they are ancillary to the use of the land for a public recreational or community purpose or are required for statutory utility infrastructure, or some other very special circumstances can be demonstrated.

This alteration would, for example, enable a PANDA nursery building to be erected, along with other community facilities as required in the future. This statement thus answers the point made in para 13 that objects to the Local Green Space as it 'could give rise to serious implications for future community led proposals".

- 5 Para 11 refers to applying 'Green Belt policy by the back door'. This is not the case. As set out in para 3 above, the Council stated that 'It would not be appropriate to include it (the Glebe) within the Green Belt as it is isolated from open countryside'. This land is in the centre of the community, which is a key criterion for a Local Green Space, which cannot be green belt by virtue of its geographical position.
- 6 Para 12 includes a misunderstianding that Open Space and Local Green Space are the same. In fact Local Green Space can be, and often is, in private ownership. Government guidance states that:

'Management of land designated as Local Green Space will remain the responsibility of its owner. If the features that make a green area special and locally significant are to be conserved, how it will be managed in the future is likely to be an important consideration. Local communities can consider how, with the landowner's agreement, they might be able to get involved, perhaps in partnership with interested organisations that can provide advice or resources'.

This is already the case for the Glebe Meadow as a result of the lease with the local church, and the LPC is keen for a range of community facilities to be available to residents in the parish.

7 The LPC therefore thanks the Diocese for their response but concludes that the submission of the Glebe Field and Glebe Meadow will be maintained (with the amendment shown above) in the Regulation 16 draft Neighbourhood Plan, for further consultation by Tandridge District Council and submission to the government inspector for final decision and approval.