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The Secretary
Ashtead Neighbourhood Forum

**Environment &
Infrastructure
Directorate
Spatial Planning Team
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County Hall
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Emailed to: ashteadcommunityvision@gmail.com

26 February 2016

Dear Sir or Madam

Consultation on the Ashtead Neighbourhood Development Plan

Thank you for consulting Surrey County Council on Ashtead's Draft Neighbourhood Development Plan (NDP). Our comments relate to transport and education provision.

With regard to transport, we would make a minor point that reference should be included to the Mole Valley Local Transport Strategy and Forward Programme. We further suggest that in encouraging cycling reference might usefully be made to the Surrey Cycling Strategy and Mole Valley Local Cycling Plan.

As the responsible authority for school place planning and provision we have concerns regarding proposed **Policy AS-En1: School Playing Fields**. This policy clearly reflects the National Planning Policy Framework (NPPF), paragraph 74, which seeks to safeguard playing fields from development. However, paragraph 74 of the NPPF does not stand alone and should be considered alongside paragraph 72 of the same document which requires local planning authorities to give great weight to the need to expand schools.

The county council would consistently seek to avoid undertaking school expansion schemes involving any loss of playing fields. However we are increasingly required to expand schools to meet the additional demand generated by population growth and to serve the needs of new development. Such expansion can sometimes only be feasibly accommodated by extending a school onto part of the playing fields and the capacity of a school site can limit the ability to replace the playing fields on site. It is our view that the provision of essential education infrastructure should be facilitated by a policy framework which clearly reflects competing objectives rather than by policies which continually require, on a routine basis, the making of an exception to policy.

We further consider that it is unreasonable to require the county council to provide additional replacement playing fields off-site as a matter of course. In addition to the costs of the school expansion projects, which are largely met by the county council, the additional cost of purchasing land for playing fields off site would be an unduly onerous burden on public funds.

We would point out that any redevelopment of playing fields requires approval from the Secretary of State for Education. Furthermore, if playing field land is lost, Sport England will generally require some form of mitigation measure through the planning process. Additionally, loss of playing field facilities providing wider benefits to the community appears adequately safeguarded by proposed NDP Policy AS-Inf3: Valued Community Facilities.

In conclusion, we consider Policy AS-En1 effectively constitutes a potential constraint to the provision of a sufficient choice of school places and thereby gives insufficient weight to the need to create, expand or alter schools set out in paragraph 72 of the NPPF which clearly points to the desirability for policy that recognises that education needs can be a legitimate circumstance in which loss of recreation facilities on school sites might be allowed.

I hope these comments are helpful. Please let me know if you require further information.

Yours sincerely



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Spatial Planning Team