

## LIMPSFIELD PARISH COUNCIL

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

22<sup>nd</sup> December 2016

Dear Sirs,

### **Tandridge Local Plan – Site Consultation (Regulation 18)**

This reply is further to Limpsfield Parish Council's ("LPC") letter dated 24<sup>th</sup> February 2016 and Limpsfield Neighbourhood Plan Steering Group's ("LNPSG") letter date 25<sup>th</sup> February 2016 in respect of the initial Tandridge District Council ("TDC") Local Plan consultation. This letter represents the formal LPC response on TDC Site Consultation having taken note of comments from by its LNPSG sub-committee.

This TDC site consultation is in respect of both specific sites and of areas where large scale development might be considered. As regards the latter, LPC supports the conclusion drawn by TDC in its Spatial Approaches Topic Paper dated October 2016 Section 9 that Limpsfield is considered to have no potential at this time for large scale development. Therefore, in this response LPC shall only address the specific sites in and adjacent to Limpsfield Parish.

The proposed sites are concentrated in two locations:

- Five development sites, several being adjacent, 4 being a "ribbon development" along the south side of the A25 Westerham Road to the junction with Wolf's Row and 1 being accessed via Wolf's Row, the latter being in the Limpsfield Conservation Area. All 5 sites are in the Green Belt (TDC parcel reference GBA 020 subsequent included with AFI 021). This part of GBA 020 is of "open character" with northerly views to the Surrey Hills. 87 new dwellings are proposed for this ribbon development along the A25 Westerham Road with a plot size ranging from 0.053 ha per plot to 0.094 ha per plot (including access roads and off-street parking). 2 sites have 1 existing dwelling each (Court Langley and Rowlands), Two sites are sub-divisions of existing dwellings (St.Michael's apartments and Thornhill) and 1 site has no existing dwellings (the old Limpsfield garden allotments); and
- One development site off Pollards Wood Road (being a continuation of Wolf's Row leading on to Red Lane) for 35 dwellings with a plot size of 0.076ha per plot (including access roads and off-street parking).

In addition to the 6 proposed sites in Limpsfield, there are 3 further development sites in the parish of Oxted South (OXTs 052, 021 & 048) where the traffic flow will emerge almost exclusively onto Pollards Wood Road and Red Lane, both roads being in Limpsfield Parish. 106 dwellings are proposed for these 3 Oxted South sites. These sites are also summarised in the lower panel of the table.

In Appendix 1 to this letter, the 6 proposed sites are examined in relation to the draft Limpsfield Neighbourhood Plan (“LNP”). Five of the sites fall into a LNP area designated as Local Character Area 3: Limpsfield Sub-area South (“LCA 3: Limpsfield South”) and the 6<sup>th</sup> site falls into LCA 5: Low Weald Farmland. In Appendix 2 the individual site descriptions as made by TDC are provided for ease of reference.

In summary, the Parish Council comments as follows:

1. All 6 proposed sites in Limpsfield fall within a Green Belt area selected by TDC for “further investigation”. In its GBA October 2016 report (“GBA Part 2”) area AFI 021 was reviewed and it was concluded that it met a sufficient number of the NPPF 5 purposes to remain designated as Green Belt. As such all 6 sites in Limpsfield were designated as “Category 3: Sites outside Areas for further Investigation”. In particular, in relation to the 5 sites OXTs 024, 055, 056, 022 and 054 (4 being A25 Westerham Road ribbon development and 1 being accessed from Wolf’s Row), the GBA Part 2 report Appendix 2 stated that the Green Belt there met the NPPF requirement of “...safeguarding the countryside from encroachment” and “... preserve the setting and special character of historic towns”, in this case Limpsfield Village and the associated Conservation Area. Equally, the 6<sup>th</sup> site (OXT 020 – Pollards Wood Road) the report stated that it formed an important barrier stopping urban sprawl from Hurst Green. The GBA Part 2 report concluded that these 6 sites in Limpsfield should not be developed unless “exceptional circumstances” pertain under the Local Plan. This Council contends that there are no exceptional circumstances and that any development of these site would also have to comply with the planning polices of the Limpsfield Neighbourhood Plan as and when adopted;
2. The proposed development density along the A25 Westerham Road of between 0.53 ha/plot and 0.094 ha/plot is not consistent with existing character of housing in the adjacent non-Green Belt part of LCA 3: Limpsfield South. This is characterised by large detached houses in large plots. The “overall sense of openness” of this area as described in GBA Part 2, Appendix 2 (AFI 021 sub-set AA3) must be preserved; the proposed development density also does not reflect the actual plot size when account is taken of need for access roads and off-street parking. These proposed developments also take no account of the adjacent Limpsfield Conservation Area with listed buildings or the Grade II listed St. Michael’s apartments that form a dominant visual backdrop to most of these sites;
3. The TDC Sustainability Review understates the importance of the sites in terms of heritage, landscape and biodiversity value. Our own indicative scoring for these sites shown in Appendix 1 ranks them as low priority sites for development compared to other sites in Oxted and Hurst Green. In particular, 4 of the 6 proposed developments represents ribbon development along the A25 and this is contra to the draft LNP;

4. Five of the proposed sites in Limpsfield identified as having capacity for 87 dwellings (OXT 024, OXT 055, OXT 056, OXT 022 and OXT 054) and will require direct access to the A25 Westerham Road (or access via Wolf's Row). This will significantly increase traffic volume on this stretch of the main A25 thoroughfare. The 6<sup>th</sup> Limpsfield site (OXT 020) and the Oxted South site (OXT 052) have access to Pollards Wood Road and further along off Red Lane another 2 Oxted South development sites (OXT 021 and OXT 048) use access from Red Lane. All together these sites have identified capacity for 141 dwellings and if all are developed it would result in a very large volume of traffic requiring access to these two narrow country roads of Pollards Wood Road and Red Lane, both in Limpsfield Parish; and
5. There is already an existing infrastructure deficiency in the Limpsfield area, the LNP process has already identified the general issue of insufficient health care provision, schools, public transport and parking infrastructure in and around the area. This will only worsen given the number and size of developments being considered in Limpsfield and in the surrounding area. This is a major concern of the LPC and its parishioners that needs to be addressed before any future development in the area.
6. There is only one doctor's surgery (and three chemists/pharmacies) in the whole Limpsfield/Oxted area, yet in the Settlements Hierarchy, the Limpsfield/ Oxted area is ranked first of the areas assessed for the potential to accommodate further development. When assessing healthcare provision, we believe that different weightings should be applied to hospitals, GPs surgeries and chemists/pharmacies. For this reason, we believe that the methodology used to compile the Settlements Hierarchy is flawed.

This ends the LPC's comments. By order of the Parish Council,

G. Dessent  
Clerk to the Limpsfield Parish Council

## **APPENDIX 1**

### **Examination of the proposed development sites in Limpsfield Parish in relation to the draft Limpsfield Neighbourhood Plan**

## 1 TDC LOCAL PLAN SITE CONSULTATION (REGULATION 18) NOVEMBER/DECEMBER 2016

Under TDC's consultation process 6 development sites have been proposed in Limpsfield Parish and as such will be subject to the Limpsfield Neighbourhood Plan planning policies when finally formalised. The proposed sites are shown in Figure 1 and summarised in Table 1 and are concentrated in two locations:

- 5 development sites, several being adjacent, 4 being a "ribbon development" along the south side of the A25 Westerham Road to the junction with Wolf's Row and 1 being accessed via Wolf's Row, the latter being in the Limpsfield Conservation Area. All 5 sites are in the Green Belt (TDC parcel reference GBA 020 subsequent included with AFI 021). This part of GBA 020 is of "open character" with northerly views to the Surrey Hills. 87 new dwellings are proposed for this ribbon development along the A25 Westerham Road with a plot size ranging from 0.053 ha per plot to 0.094 ha per plot (including access roads and off-street parking). Two sites have 1 existing dwelling each (Court Langley and Rowlands), 2 sites are sub-divisions of existing dwellings (St. Michael's apartments and Thornhill) and 1 site has no existing dwellings (the old Limpsfield garden allotments); and
- 1 development site off Pollards Wood Road (being a continuation of Wolf's Row leading on to Red Lane) for 35 dwellings with a plot size of 0.076ha per plot (including access roads and off-street parking).

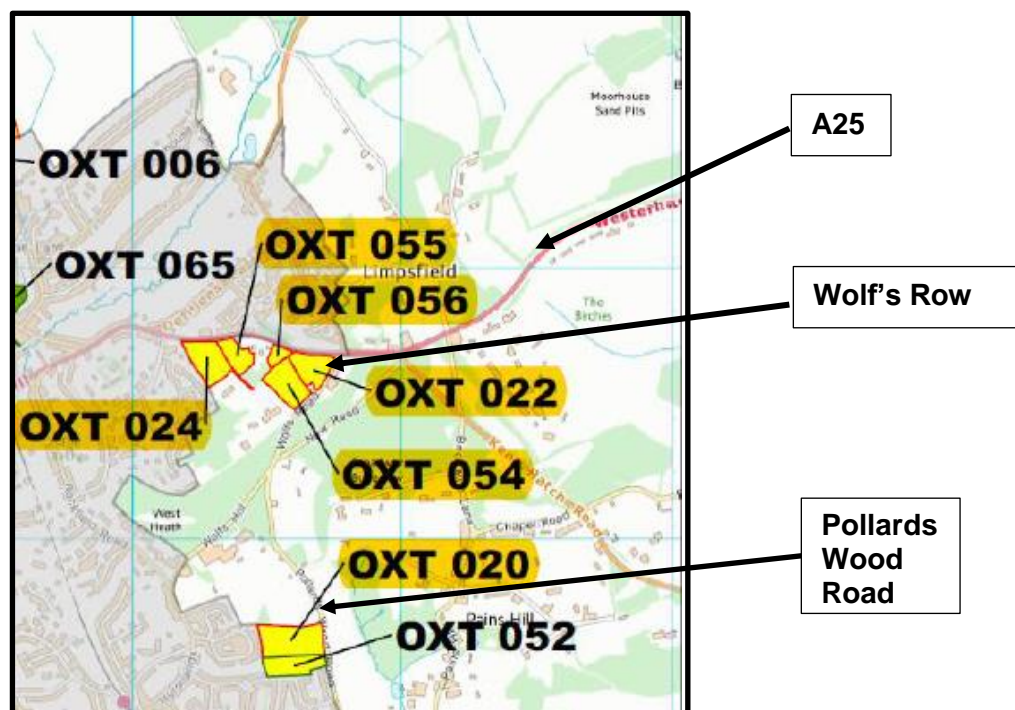


Figure 1: Map showing 6 proposed development sites in Limpsfield Parish (OXTs 024, 055, 056, 022 & 054) and 1 site in Oxted South Parish (OXT 052)

.Site	Location	Area (ha)	No. Units	Density (ha/unit)	Green Belt?	General Area
<b>Proposed developments in Limpsfield Parish</b>						
OXT 024	Thornhill / St. Michael's A25	1.88	20	0.094	YES – Ref. GBA 020 / AFI 021 (AA3)	A25 Westerham Road Ribbon Development & Wolf's Row
OXT 055	Court Langley	1.01	19	0.053		
OXT 056	Rowlands	0.43	8	0.053		
OXT 022	Wolf's Row Allotments	1.45	20	0.073		
OXT 054	Thornhill/St. Michael Wolf's Row	1.76	20	0.088		
<b>Sub-total A25 Ribbon Development &amp; Wolf's Row</b>			<b>87</b>			
OXT 020	Pollards Wood Road	2.67	35	0.076	YES – Ref. GBA 022 / AFI 021 (AA1)	Pollards Wood Road
<b>Total Limpsfield Parish</b>			<b>122</b>			
<b>Adjacent Developments in Oxted South Parish accessed via Pollard Wood Road &amp; Red Lane in Limpsfield</b>						
OXT 052	Pollard Wood Road (adjacent to OXT 020)	1.49	44	0.034	No – recreation ground	Pollards Wood Road
OXT 021	West of Red Lane	1.34	33	0.041	YES – Ref. GBA 022	Red Lane
OXT 048	West of Red Lane	1.01	29	0.035		

**Table 1: Summary of proposed development sites in and adjacent to Limpsfield Parish**

There are 3 further development sites in the parish of Oxted South where the traffic flow will emerge almost exclusively onto Pollards Wood Road and Red Lane, both being in Limpsfield Parish. 106 dwellings are proposed for these 3 Oxted South sites. These are also shown in Table 1

## **2 RELATIONSHIP OF PROPOSED DEVELOPMENTS SITES TO LIMPSFIELD'S NEIGHBOURHOOD PLAN**

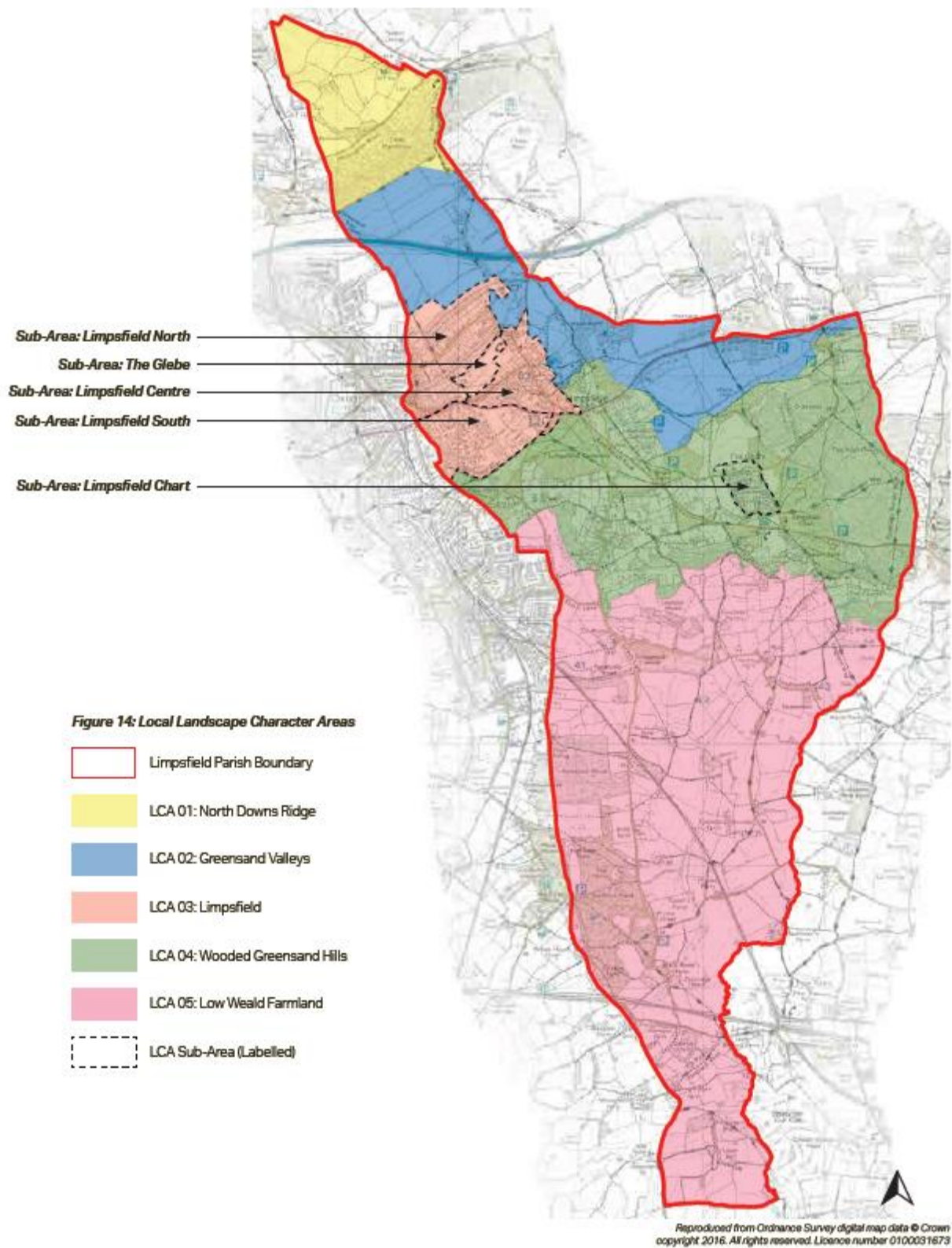
### **2.1 Status of Limpsfield Neighbourhood Plan**

The Parish Council's Neighbourhood Plan is at an advanced stage; advising consultants AECOM have completed a draft Design and Heritage Study (the "AECOM Study"), planning consultants rCOH have presented a draft Visioning Report (the "rCOH Vision") and an initial public survey was conducted by the Parish Council in October/November and resulted in more than 130 replies covering around 320 issues and suggestions (the "Initial Limpsfield Survey"). This evidence, that is summarised in Appendix 3, together with other work still to be undertaken, will support the final plan to be completed in 2017.

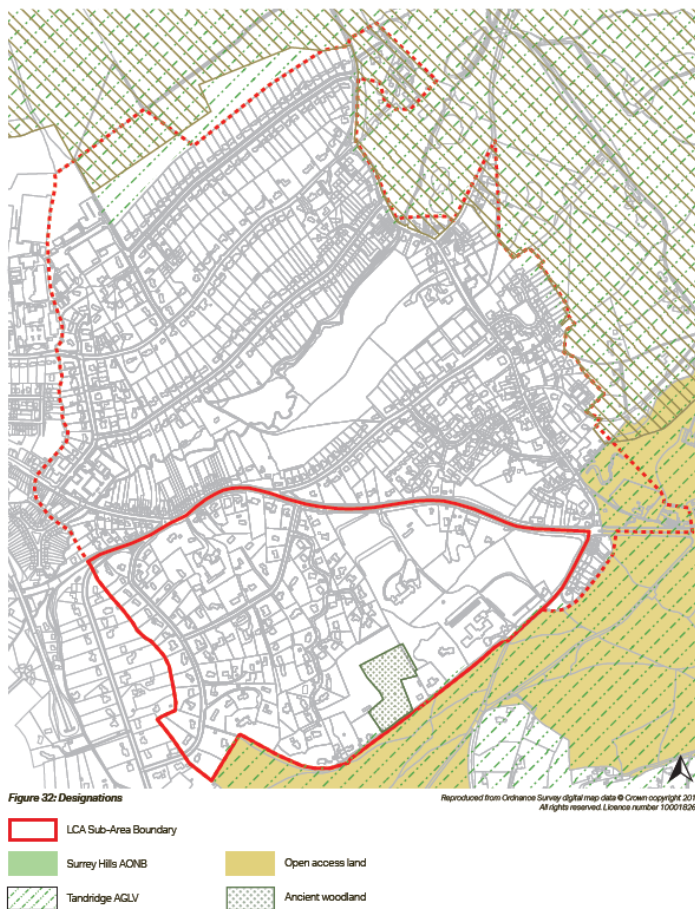
The AECOM Study divided the Parish into 6 Limpsfield Character Areas ("LCA") viz:

- LCA 1**      **North Downs Ridge**
- LCA 2**      **Greensand Valleys**
- LCA 3**      **Limpsfield (with five sub-areas: North, Glebe, Centre, South, Chart)**
- LCA 4**      **Wooded Greensand Hills**
- LCA 5**      **Low Weald Farmland**

These character areas are shown in Figure 2.



**Figure 2: AECOM Study Limpsfield Character Areas**



The sub-area has a generally north facing aspect, with the land falling from a high point of approximately 155m AOD in the south, to a low point of approximately 100m AOD in the north at the A25. In the west of the sub-area, the land has been intermittently retained along the south side of the A25 by tall stone retaining walls. There is generally high land cover across the sub-area as a result of mature trees, including an area of ancient woodland in the south. The Greensand Way and Wolf's Row are within areas of woodland on the northern edge of Limpsfield Common. There are belts of mature trees along roads and boundaries through the area, and trees located within the front and rear gardens of properties.

**Figure 3: LCA 3: Limpsfield South**

The sub-area is primarily accessed from the A25, which experiences heavy traffic. From the A25, the urban part is accessed by two roads, Uvedale Road and Brassey Road. Within the main built-up area there are several other cul-de-sacs leading off Uvedale Road and Brassey Road, many of which are marked as private roads. The Green Belt part is accessed directly from the A25 with a few private driveways and from the unnamed track across West Heath.

There is pedestrian access through the sub-area along the roads, although these roads do not have clear pavements and therefore have the feel of country lanes. The Greensand Way long distance recreational trail follows part of the southern boundary of the sub-area, leading west towards Oxted town centre and east into Limpsfield Common.

The density of development in the urban part of the sub-area is low, comprising almost entirely large detached houses set within large plots of land. Houses are generally between two and three storeys tall with gabled or hip and- valley roofs, and chimneys. There is a broadly consistent but individually varied architectural style to houses. They are well-detailed and incorporate a variety of materials, mostly built of brick and incorporating timber, stucco, plaster, and hung tiles on façades. Most houses feature casement windows, which enhances the appearance of the buildings. Houses are mostly set back from the road behind front gardens and driveways, with tall vegetated boundaries that provide privacy and enclosure from the street and public realm. The provision of private driveways allows for off-street parking that maintains the uncluttered character of the residential



roads. The well-vegetated hedgerow boundaries to properties enhance the verdant characteristics of streets in the built-up area, which include mature and recently planted street trees.

The larger areas of open undeveloped land in the Green Belt east of the sub-area comprise principally the grounds and gardens of two large and imposing buildings, the former St Michael's School, and Thornhill (**Note: 2 of the proposed development sites form part of these properties**). St Michael's School has been successfully converted into twenty separate apartments, whilst retaining its original character. The building has an imposing location on the hillside overlooking Limpsfield to the north. The St Michael's apartments are set within shared private communal grounds with garages and off-street parking. Thornhill is a recently constructed building of modern design built to reflect the style of a grand country house, and has been divided into three large terraced properties, with access from a long driveway leading off the A25. In addition there are 7 large properties assumed built in the 1920s-30s with private driveway access from the A25 (**Note: 2 of these properties are proposed development sites**). The easterly part of this Green Belt area adjacent to the A25 contains the now unused allotments (**Note: this is one of the proposed development sites**).

The hillside location of this sub-area affords extensive views across Limpsfield, Oxted, and the valley to the south towards the chalk ridge escarpment beyond. The size and location of St Michael's make it a prominent visual landmark from views within the valley and along the chalk ridge escarpment to the north.

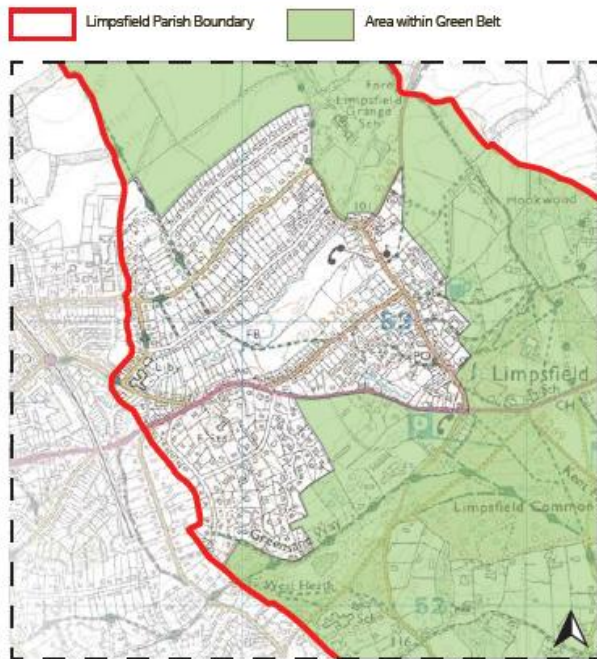
#### 2.1.1 Key Characteristics of LCA 3: Limpsfield South

The key characteristics of this sub-area are:

- Wooded hillside in the south of Limpsfield;
- Attractive northerly views across Limpsfield towards the chalk ridge escarpment
- Substantial tree cover from woodland and mature trees;
- Predominantly detached houses in large plots concentrated in the built-up area in the west of the area and with spasmodic large houses in very large plots in the Green Belt area;
- Broadly consistent but individually varied architectural style;
- Generally, two- or three-storey buildings that are well-detailed and incorporate a variety of materials and high quality finishes to the façades;
- Houses set back from the road and concealed behind front gardens and driveways allowing off-street parking;
- Verdant streets as a result of tree cover, street trees and strongly vegetated property boundaries;
- Strong sense of enclosure;
- Large and imposing buildings of St Michael's and Thornhill set within extensive landscaped grounds; and
- Heavy traffic along the A25.

#### 2.1.2 Green Belt Issues in LCA 3: Limpsfield South

The historic village of Limpsfield is considered part of the Oxted / Hurst Green / Limpsfield settlement and is "inset" meaning that is outside of the Green Belt. However, Green Belt surrounds LCA 3: Limpsfield to the north, east and south as shown in Figure 4. LCA 3: Limpsfield Centre includes the densely built Conservation Area village dating mostly from the 16<sup>th</sup> to 19<sup>th</sup> Centuries. As such the existing Green Belt around LCA 3 Limpsfield is important to preserve the setting and special character of this historic village as well as the associated Conservation Area (ref. NPPF "five purposes").



***It is this southern green space in LCA 3: Limsfield South, where intensive development is now proposed with sites OXTs 024, 055, 056, 022, & 054.***

The urban portion of Limsfield (bounded in the inset) (bounded in the inset) and half is within the Green Belt. The inset part is accessed via Brassey Road and Uvedale Road where large "mansion" style houses were built in the 1920s and 1930's followed subsequently with some infilling and in particular with a new private estate (Brassey Hill). The Green Belt portion is the area east of Brassey Road along the A25 and extends up to the West Heath with again a few older houses in large plots.

Approx. area of proposed development sites 5

**Figure 4: Green Belt Surrounding Limsfield**

Under the TDC Green Belt Assessment December 2015 ("GBA Part 1") this part of the Green Belt in LCA Limsfield South was designated as part of a small parcel with reference GBA 020. In Appendix D of that assessment it concluded that GBA 020 it did not meet all of the requirements of the Green Belt and was referred for "further investigation" as to changing the Green Belt boundary and this area GBA 020 was joined with GBA 022 (see below in relation to the 6<sup>th</sup> proposed development site) and together re-named AFI 021.

The reason given for referring the area for further investigation was stated in the Green Belt Assessment 2015 Appendix D Paragraph D.21.6 as "However, in some cases here are some anomalies where certain properties are excluded from the Green Belt whilst others are contained within it. ....This is also most prominent where Wolf's Road intersects with the A25: there are a number of sizeable properties included within the Green Belt here yet they are more consistent with the dwellings on the adjacent side of the A25, within the urban area."

This statement is not correct. The sizable properties mentioned are amongst others St. Michaels (a grade II previous boarding school and now converted into apartments, 7 older large houses built long before Green Belt designation and Thornhill, a new large mansion in three separate dwellings. These are of a very different built form and plot size than the "adjacent" properties on the north side of the A25 as stated in TDC Green Belt assessment (Part 1) and cannot be considered to represent "urban sprawl". Indeed, the Green Belt in LCA 3 sub-area South has contributed to the NPPF purpose 3 of "assisting to safeguard the countryside from encroachment".

In the Green Belt Assessment October 2016 ("GBA Part 2") AFI 021 was re-examined and the detailed description is set out in Appendix 2 of that report pages 78 to 82. The area AFI 021 was then split into three parts with the previous GBA 020 numbered AA3. GBA Part 2 concluded that:

*"With AA 3 the density of development is generally low, aside from along Wolf's Row, and whilst the residential use does not relate well to the purposes of the Green Belt and constitutes sprawl from built-up areas and encroachment upon the countryside, the dwellings in this locality pre-date the*

*designation of this area in the Green Belt. Given the scale of the built-up elements and the setting of this analysis area, the extent of the open land and its character off-sets the scale of built-up elements and results in an overall sense of openness. In addition, the analysis area serves to preserve the outer edges of the Limpsfield Conservation Area. It is considered therefore that this part of the Area for Further Investigation should remain unaltered.”*

Although AFI 021 (and in particular sub-set AA3) was not referred on for further investigation in the Green Belt Assessment Part 3 (assumed currently to be underway), there were caveats stated in the GBA Part 2 conclusion paragraph 2.35 as follows:

*“In recommending Areas to be considered in Part 3 in terms of exceptional circumstances, and settlement suitability for ‘insetting’ at the Regulation 19 stage, this Part 2 Report rules out all remaining Areas for Further Investigation on Green Belt grounds. These Areas will no longer be considered as part of the Green Belt Assessment. However, they may still be considered through the Local Plan process in terms of exceptional circumstances that may justify release from the Green Belt on the basis of evidence considerations other than the Green Belt Assessment. Accordingly, where exceptional circumstances are being determined through the Local Plan on the basis of other evidence base considerations, these would not include the conclusions of this Green Belt Assessment.”*

The inference that may be drawn is that the previous area of Green Belt GBA 020 in LCA Limpsfield South (now re-numbered as AFI 021 sub-set AA3) may be subject to Green Belt boundary change under “exceptional circumstances” due to evidence submitted under the Local Plan to accommodate the proposed development sites OXTs 024, 055, 056, 022, & 054.

### 2.1.3 Neighbourhood Plan draft recommendations regarding development in LCA 3 Limpsfield and in particular in LCA 3: Limpsfield South

The Neighbourhood Plan draft “vision” is to prevent further urban sprawl from Oxted and other settlements from encroaching upon LCA 3: Limpsfield by maintaining the barrier of green space provided by the Green Belt in the north, south and east and by making the Conservation Area a focus for the community.

The following aspects of LCA 3: Limpsfield South are particularly sensitive to change:

- Street trees and tree cover in the area;
- Concealed development; and
- Well-vegetated property boundaries.

Managing change in this sub-area should focus on maintaining its distinctive wooded character. The following principles should be considered when defining policies with respect to heritage and character:

- Any new buildings should respect the design and character of the area, including building heights and architectural detailing;
- The materials proposed for any new buildings and building alterations should be good quality and responsive to the design of the local area;
- Proposals to alter existing buildings should demonstrate a thorough understanding of the history and design qualities of the buildings and provide a clear rationale for how this is taken account of in the design of the alterations proposed;
- Proposals for new development should incorporate front gardens, off-street parking and vegetated boundaries to protect the streetscape;
- Retain public rights of way and continue to keep these well-maintained;

- Seek alternative uses for the disused allotment site that respect the character of this sub-area and the setting of Limsfield Conservation Area;
- Development proposals that would have a negative effect on the character of the area through the loss of trees or tree cover should not be permitted; and
- Conserve and protect heritage assets and their setting.

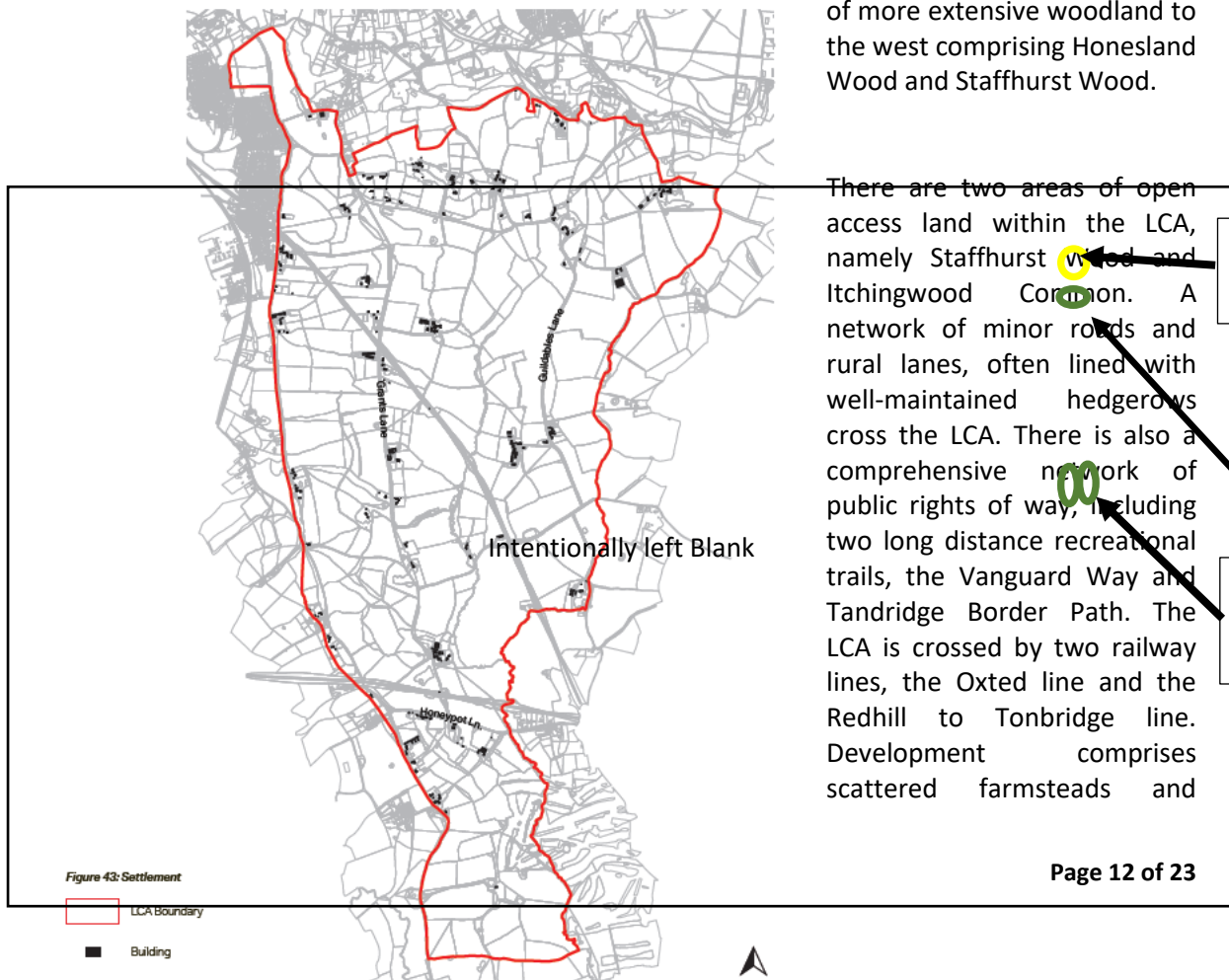
**2.2 Local Character Area 5: Low Weald Farmland (1 proposed development site and 3 other adjacent Oxted South sites)**

LCA 5: Low Weald Farmland (that contains 1 development site in Limsfield) but also 3 Oxted South sites that produce traffic flow directly into Limsfield is shown in Figure 5 and described in the AECOM Study as follows:

**Landscape Designation** – This LCA broadly follows the boundary of LCA WF3: Low Weald Farmland as defined in the Surrey Landscape Character Assessment, with a partial amendment to exclude land on the northern boundary at Pains Hill that is perceived to be more characteristic of the Wooded Greensand Hills LCA 4. The LCA is mostly within the Tandridge AGLV, which extends southwards as far as the Redhill to Tonbridge railway line.

**Summary Description** – The LCA comprises the area of Weald farmland within the parish to the south of the Greensand ridge. The topography in the LCA is broadly undulating, and falls towards winding, north-south flowing watercourses principally Crooked River, which runs through the middle of the LCA, and Kent Brook, which runs along the eastern edge of the LCA. These form minor local valley features. The wider landform falls from north to south from a high point of approximately 125m AOD at the foot of the Greensand hills, to a low point of approximately 50m AOD on the southern boundary of the LCA. The LCA consists predominantly of medium-large arable fields, along with occasional areas of smaller pastoral fields. Fields are bounded by a generally consistent network of well-maintained hedgerows with trees. There are dispersed blocks of woodland (often ancient woodland) and an area of more extensive woodland to the west comprising Honesland Wood and Staffhurst Wood.

There are two areas of open access land within the LCA, namely Staffhurst Wood and Itchingwood Common. A network of minor roads and rural lanes, often lined with well-maintained hedgerows cross the LCA. There is also a comprehensive network of public rights of way, including two long distance recreational trails, the Vanguard Way and Tandridge Border Path. The LCA is crossed by two railway lines, the Oxted line and the Redhill to Tonbridge line. Development comprises scattered farmsteads and



detached houses, but overall there is limited settlement in the LCA, which has a strongly rural and tranquil character. The LCA contains a considerable number of listed buildings, including one Grade I listed building that are indicative of the general historic interest and architectural quality of buildings in the LCA.

## Figure 5: LCA 5: Low Weald Farmland

### 2.2.1 Key Characteristics of LCA 5: Low Weald Farmland

The key characteristics of this sub-area are:

- Strongly rural and tranquil area;
- Mostly within the Tandridge AGLV;
- Broadly undulating landform with minor valleys formed by small winding watercourses;
- Predominantly farmland consisting of medium-large arable and smaller pastoral fields;
- Dispersed blocks of often ancient woodland;
- Areas of open access land;
- Limited settlement consisting predominantly of scattered farmsteads and isolated detached houses.

### 2.2.2 Green Belt in LCA 5: Low Weald Farmland

Under the TDC Green Belt Assessment December 2015 ("Part 1") this LCA is within the designated parcel with reference GBA 022. In Appendix D of that assessment it concluded that GBA 020 did meet all of the requirements of the Green Belt. Further, in the Green Belt Assessment Part 2 review it was not highlighted for further investigation. Yet, in the submission for the proposed development OXT 020 it states:

*"the site is located in an area that effectively serves the purposes of including land within the Green Belt ... It may still be subject to the exceptional circumstances test..."*

and this area GBA 022 was joined with GBA 020 (see above in relation to the 5 other proposed development sites) and together re-named AFI 021. As described in Section 2.1.2 above, in GBA Part 2 AFI 021 was re-examined and was then split into three parts and the previous GBA 022 was numbered AA1. This Part 2 study concluded that as regards AA1:

*"... overall there is a sense of openness. Whilst the area around the school does not relate well to the purposes of including land in the Green Belt, overall the Green Belt in this location has prevented the sprawl of a large built-up area and safeguarded from encroachment upon the countryside. It is acknowledged that the boundary between Green Belt and urban areas is blurred and that more definitive boundaries are present, comprising Pollards Wood Road and the public footpath to the north, which is both tree and hedge lined and on a slight ridge however as it is considered to serve some of the Green Belt purposes it is not recommended for further consideration as part of the Green Belt Assessment".*

Although AFI 021 (and in particular sub-sets AA3 and AA1) were not referred on for further investigation in the GBA Part 3, as stated above the caveats stated in the GBA Part 2 conclusion paragraph 2.35 (see above) equally apply to this development site OXT 020.

The inference that may be drawn is that the previous area of Green Belt GBA 022 in LCA 5. Low Weald Farmland (now re-numbered as AFI 021 sub-set AA1) may be subject to Green Belt boundary

change under “exceptional circumstances” due to evidence submitted under the Local Plan to accommodate the proposed development sites OXT 020.

### 2.2.3 AECOM study recommendations regarding development in LCA 5: Low Weald Farmland

Managing change in this LCA should focus on retaining the rural and tranquil characteristics of the area. The following principles should be considered when defining policies with respect to heritage and character:

- Conserve the rural, largely unsettled landscape;
- Any new development should be integrated by woodland edges, shaws, hedgerows and well linked to the surrounding landscape fabric;
- Ensure farmstead or other agricultural conversions are sympathetic to the character of the area, with consideration given to boundary treatments and integration with the local landscape;
- Conserve the rural roads by minimising small-scale incremental change such as fencing and new domestic accesses;
- Any new development should be of a high quality, incorporate a variety of high-quality materials and be well-detailed and responsive to local vernacular styles;
- Proposals to alter existing buildings should demonstrate a thorough understanding of the history and design qualities of the buildings and provide a clear rationale for how this is taken account of in the design of the alterations proposed; and
- Conserve and protect heritage assets and their setting.

## 3 SUSTAINABILITY ASSESSMENT

In the Sustainability Appraisal for TDC October 2016 undertaken by Lepus Consulting, each proposed development site in Tandridge was examined for sustainable development based on various measures. For the 6 proposed development sites in the Limpsfield parish these measures are shown in the top panel of Table 2.

TDC indicative score	LCA 5: Low Weald Farmland	LCA 3: Limpsfield South				
	Pollard Wood	Allotments	Thornhill	St.Mich's/Thornhill	Court Langley	Rowlands
	OXT 020	OXT 022	OXT 024	OXT 054	OXT 055	OXT 056
Housing	++	+	+	+	+	+
Health	-	+	+	+	+	+
Cultural Heritage	0	-	0	-	-	-
Transport	++	+	++	++	+	++
P. Developed Land	-	-	-	-	-	-
Economics	0	0	0	0	0	0
Employment	+	+	+	+	+	+
C. Change Mitigation	0	0	0	0	0	0
Natural Resources	+	+	+	+	+	+
C. Change Adaptation	0	0	0	0	0	0
Flood Risk	+	+	+	+	+	+
Water Quality	0	-	-	-	-	-
Contaminated land and soils	-	-	-	-	-	-
Air quality	+	+	+	+	+	+
Landscape	-	+/-	+/-	+/-	+/-	+/-

Biodiversity	-	-	-	-	-	-
<b>Weight assigned to score</b>						
Housing	2	1	1	1	1	1
Health	-1	1	1	1	1	1
Cultural Heritage	0	-2	-1	-2	-2	-2
Transport	2	2	2	2	2	2
P. Developed Land	-1	-1	-1	-1	-1	-1
Economics	0	0	0	0	0	0
Employment	1	1	1	1	1	1
C. Change Mitigation	0	0	0	0	0	0
Natural Resources	1	1	1	1	1	1
C. Change Adaptation	0	0	0	0	0	0
Flood Risk	1	1	1	1	1	1
Water Quality	0	-1	-1	-1	-1	-1
Contaminated land and soils	-1	-1	-1	-1	-1	-1
Air quality	1	1	1	1	1	1
Landscape	-1	-2	-2	-2	-2	-2
Biodiversity	-1	-2	-1	-1	-1	-1
Sum of scores	3	-1	1	0	0	0
<b>Overall ranking all OXT sites</b>	<b>6</b>	<b>20</b>	<b>12</b>	<b>15</b>	<b>15</b>	<b>15</b>

**Table 2: Sustainability Assessment for Proposed Development Sites in Limpsfield**

These measures were then given an impact significance colour and plus/minus indicator as to their effect and the key for these is shown in the second column of Figure 6. For the 6 proposed development sites in the Limpsfield parish these indicators are shown in the upper panel of Table 2. For this Appendix analysis a simple score weighting for each indicator has been added as shown in the third column of Figure 6 and these are used in the lower panel of Table 2 to obtain a score for each proposed development site in Limpsfield.

Lupus impact indicator		This analysis score weighting
Likely strong positive effect	++	+2
Likely positive effect	+	+1
Neutral / no effect	0	0
Likely adverse effect	-	-1
Likely strong adverse effect	-	-2
Uncertain effect	+/-	-1 or -2

**Figure 6: Significance indicators and scoring**

In the upper panel of Table 2 the large amount of red shading indicates negative factors about the sites from a sustainability perspective.

In the lower panel of Table 2 an adjustment has been made as to the sites' significance in respect of Cultural Heritage (5 out of 6 more negative) Transport (2 out of 6 more positive), Landscape (5 out of 6 more negative) and Biodiversity (1 out of 6 more negative). These changes are subjective and indicative at this time. The scoring approach indicates that OXT 020 has the largest positive score of the 6 sites. When ranked on the same basis across all OXT proposed sites (25 sites – see Sustainability Appraisal for Tandridge District Council dated October 2016 paragraph 3.10 Oxted), OXT 020 ranked 6<sup>th</sup> but the other 5 sites ranked between 15<sup>th</sup> and 20<sup>th</sup>.

Based on this adjusted Sustainability Assessment, the proposed sites in the Limpsfield parish, 5 are very much less sustainable than other sites in the Oxted area of Tandridge and only 1 site (OXT 020) is reasonably sustainable.

#### 4 SPECIFIC SITE ASSESSMENTS

##### 4.1 LCA 3: Limpsfield South

The proposed development sites in LCA Limpsfield South are shown in Figure 7 and the individual site descriptions made by TDC are provided in Appendix 2. In Figure 7 the sites are shown clockwise as OXT 024 in yellow (Thornhill), OXT 055 in pink (Court Langley), OXT 056 in purple (Rowlands), OXT 022 in green (old allotments) and OXT 054 in blue (St. Michaels). As set out in Table 1, these sites have a planned capacity of 87 dwellings, replacing 2 existing dwellings.

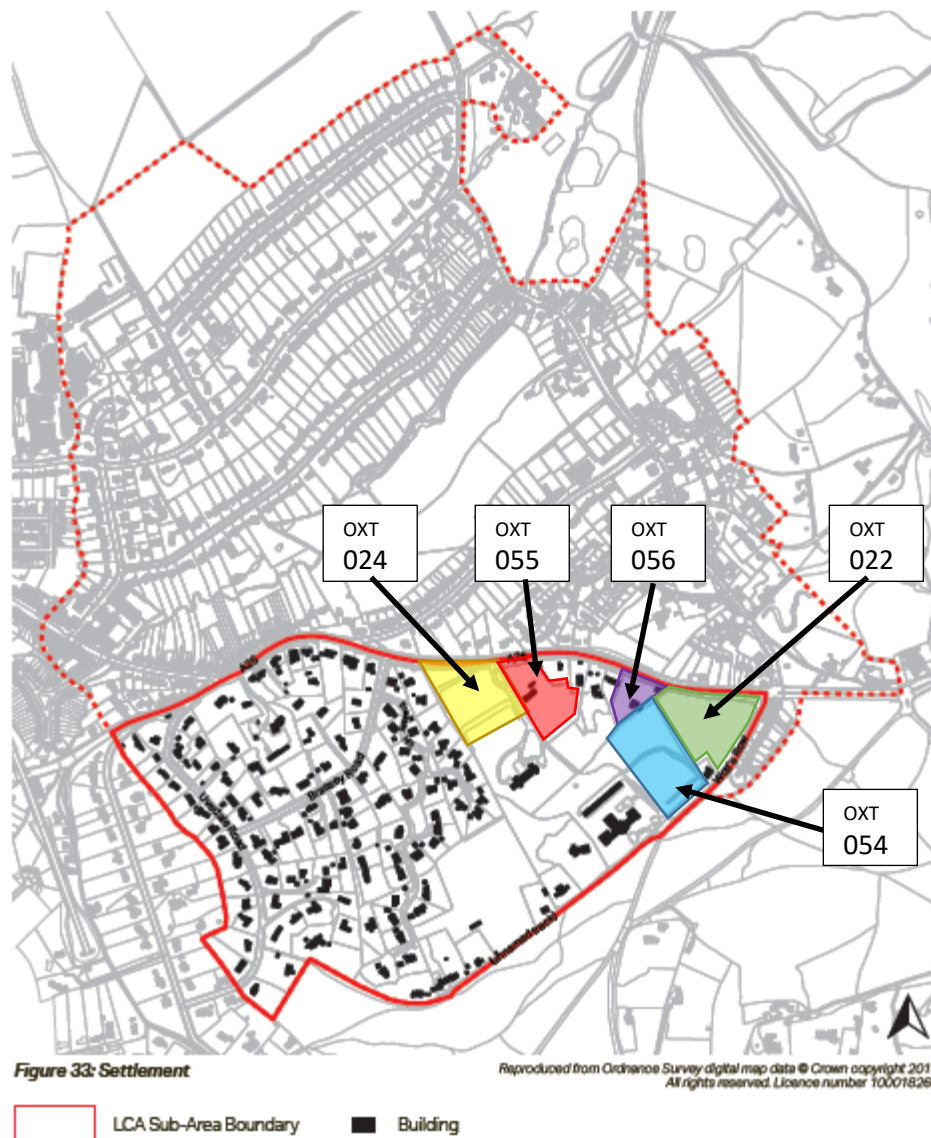


Figure 7: Proposed development sites in LCA 3: Limpsfield South (5 proposed development sites)

The general comment about the 5 sites shown in Figure 7 are:



1. All of the sites fall within the Green Belt and as stated in Section 2.1.2 this parcel of Green Belt (AFI 021, sub-set AA3) is not being considered for further investigation as it is considered to meet a number of the NPPF purpose 5 tests. In particular it meets NPPF test 3 “to assist in safeguarding the countryside from encroachment” and test 4 “to preserve the setting and special character of historic towns”.
2. The reference in the green Belt Assessment October 2016 (Part 2) study that some sites may be subject to green belt boundary change due to other evidence presented as part of the local plan leaves it unclear as to what TDC’s position is regarding development of these sites in the Green Belt.
3. The proposed development density of between 0.053 ha/plot and 0.094 ha/plot is not consistent with existing character of housing in the adjacent non-Green Belt part of LCA 3: Limpsfield South that is characterised by large detached houses in large plots as described in Section 2.1.1. Examples of these are shown in Figure 8. The “overall sense of openness” of this area as described in the Green Belt assessment October 2016 (Part 2) Appendix 2 (AFI 021 sub-set AA3) must be preserved; The proposed development density also does not reflect the increased per dwelling density due to the need for access roads and off-street parking required or the possible need for public parking for better access to LCA 3: Limpsfield Centre Conservation Area;
4. The proposed developments take no account of the adjacent Limpsfield Conservation Area with listed buildings or the Grade II listed St. Michael’s apartments;
5. The TDC Sustainability Review understates the importance of the sites in terms of heritage, landscape and biodiversity value. The indicative scoring for these sites rank them as low priority sites for development compared to other sites in Oxted and Hurst Green (indicated by the “OXT” reference) and the proposed developments represents ribbon development along the A25 Westerham Road and this is contra to the draft Limpsfield Neighbourhood Plan.

6. Under the final Limpsfield Neighbourhood Plan any development of these sites ( OXT 024, OXT 055, OXT 056, OXT 022 and OXT 054) would be need to be



Thornhill



Well-detailed housing



Off-street parking



Strongly vegetated property boundaries



Green and verdant streets



Northerly views of the chalk ridge escarpment



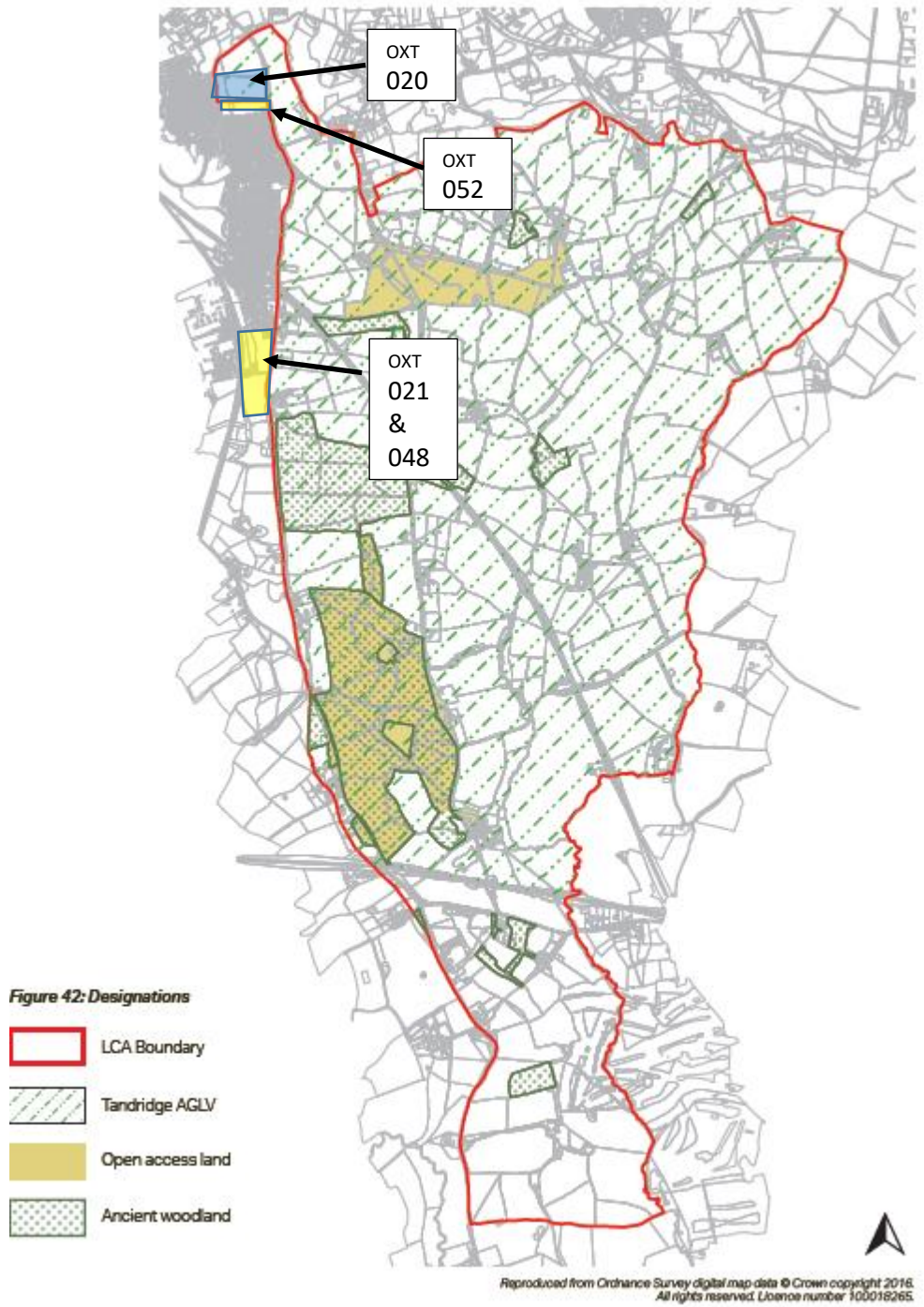
Strong sense of enclosure

considered as co-joined as a very large development for which specific design and character policies would need to apply. In particular, the development of site OXT 022 may be considered desirable for development in order to meet specific Neighbourhood Plan requirements, although consideration of any sites for development in Limpsfield is still at an early stage as part of the LNP “vision” statement.

**Figure 8: Housing examples and street scene in LCA 3: Limpsfield South**

**4.2 LCA 5: Low Weald Farmland (1 proposed development site)**

The proposed development site OXT 020 in LCA 5: Low Weald Farmland is shown in Figure 9 and the site descriptions made by TDC is provided in Appendix 2.



**Figure 9: Proposed development site in LCA 5: Low Weald Farmland (1 site OXT 020 shown in blue)**

In Figure 9 is also shown in yellow the adjacent Oxted South Parish site to OXT 020, namely OXT 052, which is described in detail in Appendix 2. Site OXT 020 has a planned capacity of 35 dwellings (and the adjacent site OXT 052 a planned capacity of 44 dwellings). Two further Oxted South sites (OXT 021 and OXT 048) have planned total capacity of 62 more dwellings.

If the 6<sup>th</sup> site in Limpsfield Parish (OXT 020) is developed as well as the adjacent Oxted South site (OXT 052) and the 2 further Oxted South sites off Red Lane (OXTs 021 and 048), these 142 dwellings would result in a very significant increase in traffic along both Pollards Wood Road and Red Lane. This is because these roads lead northwards toward the A25 (on to the M25) and also toward Oxted

town centre and railway stations of Oxted and Hurst Green. These roads are narrow and have the nature of country lanes and are unsuitable for such a large increase in traffic.

The general comments about site OXT 020 shown in Figure 9 are:

1. This site falls within the Green Belt and as stated in Section 2.2.2 this parcel of Green Belt (AFI 021, sub-set AA1) is not being considered for further investigation as it is considered to meet a number of the NPPF purpose 5 tests. The reference in the GBA (Part 2) study that some sites may be subject to Green Belt boundary change due to other evidence presented as part of the local plan leaves it unclear as to what TDC's position is regarding development of this site in the Green Belt;
2. The proposed development density of 0.076 ha/plot to include access roads and off-street parking is not consistent with existing development in Limpsfield where spur roads access "Close" developments with green spaces within the developments (e.g. Padbrook). The "overall sense of openness" of this area as described in the GBA Part 2 Appendix 2 (AFI 021 sub-set AA1) should be preserved;
3. The Sustainability Assessment indicates that this is the most sustainable of the 6 proposed sites in Limpsfield, although a more thorough analysis of the biodiversity will be necessary given its setting next to open countryside; and
4. The proposed development is adjacent to a much smaller site proposed for development for 44 dwellings with a high density of 0.34 ha/plot. This very high density, reflecting the similar density in the adjacent Hurst Green urban area, is not consistent with the proposed density of OXT 020.

Under a final Limpsfield Neighbourhood Plan development of site OXT 020 may be considered desirable for development in order to meet specific requirements for smaller dwellings, although consideration of any sites for development is still at an early stage as part of the LNP "vision" statement.

.....

**Limpsfield Parish Council, 22<sup>nd</sup> December 2016**

## **APPENDIX 2**

**TDC Local Plan Proposed Development Sites in Limpsfield Parish  
December 2016**

**(See separate PDF File)**

## **APPENDIX 3**

### **Limpfield Neighbourhood Plan – Initial Survey of Residents as to Issues and Request for Suggestions October & November 2016**

	Green Belt	Affordable Housing	Other Housing	Parking	Traffic	Community Assets & Infrastructure	Village / Street Scene	Other (not included in ranking)	Total Issues / Suggestions
<b>ISSUES</b>	13	14	11	13	37	20	40	13	161
	9%	9%	7%	9%	25%	14%	27%		
ISSUES RANK (Excl Other)	4	4	7	4	2	3	1		
<b>SUGGESTIONS</b>	11	14	5	24	47	33	15	14	163
	7%	9%	3%	16%	32%	22%	10%		
SUGGESTIONS RANK (Excl Other)	6	5	7	3	1	2	4		
Average Rank	5.0	4.5	7.0	3.5	1.5	2.5	2.5		
Overall rank	6	5	7	4	1	2	2		
<b>All Housing in one category</b>	<b>Green Belt</b>		<b>All Housing</b>	<b>Parking</b>	<b>Traffic</b>	<b>Community Assets &amp; Infrastructure</b>	<b>Village / Street Scene</b>	<b>Other (not included in ranking)</b>	<b>Total Issues / Suggestions</b>
ISSUES	13		25	13	37	20	40	13	161
	9%		17%	9%	25%	14%	27%		
ISSUES RANK (Excl Other)	5		3	5	2	4	1		
SUGGESTIONS	11		19	24	47	33	15	14	163
	7%		13%	16%	32%	22%	10%		
SUGGESTIONS RANK (Excl Other)	6		4	3	1	2	5		
Average Rank	5.5		3.5	4.0	1.5	3.0	3.0		
Overall rank	6		4	5	1	2	2		

Limpsfield Parish Council – Preliminary Summary of Initial NP Survey of Residents – October/December 2016