

Appendix Two

As part of the Neighbourhood Plan process, the Parish Council undertook a consultation process with the landowners of sites proposed for Local Green Space designation and contacted landowners at an early stage about proposals to designate their land in line with the guidance set out in Planning Practice Guidance and specifically paragraph 019 ID:37-019-20140306.

No letter was sent relating to the Padbrook pond open area (LGS 7) because the Parish Council understands that the company that previously owned this land has been wound up and the assets of the company have reverted to the Crown. No letter was sent for Stanhopes Village Green (LGS 8), which is owned by Limpsfield Parish Council.

For ease of reference a summary of all the Local Green Space correspondence and meetings is provided in this appendix, together with the Parish Council's responses to the objections received from the Diocese of Southwark and St Peter's Church Limpsfield.

Local Green Spaces –Summary of Correspondence and Meetings

<u>Site</u>	<u>LGS Designation</u>	<u>Owner</u>	<u>LGS Correspondence</u>	<u>LGS Meeting(s)</u>	<u>Outcome</u>
Brook Field	LGS 1	Titsey Estate	Letter to landowner's agent 13 th June 2018. Email correspondence 28 th August and 17 th September.	Meetings December 2016 and November 2017	Email from Strutt and Parker 28 th August agreeing to LGS designation
Glebe Field	LGS 2	Diocese of Southwark	Letters to landowner 11 th June and 20 th August 2018	Meetings 15 th October 2017 and 7 th August 2018	Regulation 16 submission dated 16 th July objecting to LGS designation
Glebe Meadow	LGS 3	Diocese of Southwark	Letters to landowner 11 th June and 20 th August 2018	Meetings 15 th October 2017 and 7 th August 2018	Regulation 16 submission dated 16 th July objecting to LGS designation
Land in front of Carpenters Arms	LGS 4	The National Trust	Letter to NT June 18 th 2018	None but National Trust representative participated in NP Topic Group	No response received
Gardens to front and side of Hookwood Bungalows	LGS 5	Tandridge District Council	Letter to TDC Chief Executive, June 11 th 2018	Their LGS sites were discussed at some of the regular meetings with TDC.	No response received
Land to the north of A25	LGS 6	The National Trust	Letter to NT June 18 th 2018	No None but	No response received

				National Trust representative participated in NP Topic Group	
Padbrook pond and adjacent green spaces	LGS 7	Unknown Ownership (land reverted to The Crown)	None	None	N/A
Stanhopes Village Green	LGS 8	Limpsfield Parish Council	None	None	N/A
Tidy's Green	LGS 9	Tandridge District Council	Letter to TDC Chief Executive, June 11 th 2018	Their LGS sites were discussed at some of the regular meetings with TDC.	No response received
Field to the north of Boulthurst Way playing field	Removed from LGS list following objection from landowner	Private individual	Letter to landowner 11 th June 2018	None	Green belt site removed from LGS list following objection from landowner
Land at Pains Hill	Removed from LGS list following objection from landowner	Sutton and East Surrey Water	Letter to landowner 18 th June 2018	None	Green belt site removed from LGS list following objection from landowner

Response to Diocese of Southwark Regulation 16 Submission

Specific Local Green Space Comments

(1) When Limpsfield Parish Council evaluated sites for potential Local Green Space designation, the Parish Council considered the principles established by paragraphs 76 and 77 of the 2012 National Planning Policy Framework (NPPF) and in line with the guidance set out in Planning Practice Guidance¹ (PPG). The following four tests were applied for identifying potential Local Green Space across the parish.

Test 1. Does the site already have planning permission, or has it been allocated for development in the Tandridge Local Plan?

Test 2. Is the site reasonably close to the community it serves?

Test 3. Is the site local in character and not an extensive tract of land?

Test 4. Is the site demonstrably special to the local community?

It is the Parish Council's view that the Glebe Field and Glebe Meadow sites clearly pass these four tests, and the proposed designations are consistent with local planning for sustainable development² and do not undermine the aims of plan making in Tandridge District as a whole, or in Limpsfield Parish specifically in which no housing allocations are proposed for the Parish in the emerging Local Plan.

The Diocese of Southwark in its Regulation 16 submission, has provided no counter argument or evidence to the contrary.

¹ PPG reference ID:37-005-20140306 to ID: 37-022-20140306

² PPG ID:37-007-20140306

(2) As referenced in the Neighbourhood Plan Appendix D – Assessment of Local Green Spaces in Limpsfield Parish - The proposed Local Green Space designation for the Glebe Field and Glebe Meadow is consistent with the policy of Tandridge District Council dating back at least to the **South of the Downs Plan** in 1986 which stated the following-

“The value of open land at Brook and Glebe Fields, Limpsfield is recognised. It provides an open aspect and is accessible to 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:

Policy 2

Land at Brook and Glebe Fields Limpsfield as shown on the proposals map will remain in open use.”

The principle of maintaining the Glebe and Brook Fields as green space was upheld in the **Tandridge District Plan Inspectors Report of 2000**. Section 3.84 (page 114) makes specific reference and recommendations regarding the retention of the Glebe (Field and Meadow) and Brook Fields as open space. The inspector’s comment was

“I see the site in question as a good candidate for (continued) designation as open space. In brief, it is a substantial (9.5 ha.) area of gently sloping land, about 500 m. in length, by about 200 m. wide. It is mainly grassed, but contains a sportsfield at the Limpsfield end. Otherwise, it has an attractive, semi-rural, open character and appearance, with numerous trees and shrubs, and enjoys public access by way of an apparently well-used footpath. It is generally well-maintained, and is readily accessible to the surrounding residential areas and to a substantial population. Although not appropriate for inclusion in the GB, it certainly fulfils a local gap function, assisting in the separation of south Oxted and Limpsfield. (The fact that these urban areas have merged at the northern and southern ends of the objection site make it “landlocked”, and thus unsuitable for inclusion in the GB). Thus, I agree in general with the previous Inspector’s assessment at the SDLP (South of the Downs Local Plan 1994) inquiry. “

The **Tandridge District Core Strategy** adopted in October 2008 included the following -

Policy CSP 13

Community, Sport and Recreation Facilities and Services

Existing community, recreational, sports facilities and services (see Glossary) and open space will be safeguarded. New or improved facilities to meet the needs of all sections of the community will be encouraged. The Council will encourage the dual use of community and sports facilities.

And

The Council will seek to protect the Rights of Way network, in particular the North Downs Way national trail, the Greensand Way and Vanguard Way recreational paths from developments that would adversely affect the enjoyment of users of the network. The Council will encourage improvements to the network and the North Downs Way.

Further

15.4 "Green spaces" within or separating existing built up areas and within the villages, but not covered by Green Belt policy, contribute to biodiversity, character and quality of life within the areas they are located. Therefore, existing green spaces will be retained."

The decision by Limpsfield Parish Council to register the Glebe Field and the Glebe Meadow as Assets of Community Value in 2015 and to now propose Local Green Space designation is a continuation of these prevailing policies.

We note that the Diocese of Southwark's Regulation 16 submission makes no acknowledgement of the well-established principles that the Glebe Meadow, the Glebe Field and the Brook Field should remain as open spaces and available for sports and recreational use.

(3) The 2012 National Planning Policy Framework (NPPF), makes specific mention of the need to retain playing fields and open spaces for recreational use. As referenced in the Neighbourhood Plan Appendix D, the Glebe Meadow has had a football pitch which has been in use since at least 1933, firstly by a village- based football team and more recently by a local junior football team for coaching and holiday activities. This site was leased firstly to the football club and more recently to the Parish Church, which has in turn granted a 10- year licence to the Panda Nursery (adjacent to the sports pavilion).

Paragraph 6 of the Diocese of Southwark's Regulation 16 submission confirms that the Diocese acquired the Glebe assets in 1978, 45 years after the village-based football team moved to the Glebe Meadow. The Glebe Meadow had been a valued and much used community asset for many years before being acquired by the Diocese.

The Glebe Meadow and the adjoining Glebe Field (which is used for grazing by a local farmer under a life time tenancy agreement) have never been a major source of revenue for the Diocese of Southwark. The current income from these assets will be unaffected by the proposed Local Green Space designations of the two sites.

Paragraph 7 of the Diocese of Southwark's Regulation 16 submission references the role of its Board of Finance to raise funds (both capital and income) from glebe assets as one of the reasons for objecting to the proposed Local Green Space designations for the Glebe Field and Glebe Meadow. This may be the case, but the Parish Council would point out that the Diocese of Southwark also owns a developable site with planning consent in the Limpsfield Village Conservation Area (adjacent to the Church Hall and in close proximity to the glebe assets) which has stood derelict, behind hoardings for 15 years, providing no income to the Diocese.

(4) Provision of Community Facilities- Policy LNP 8 - It is the Parish Council's understanding that NPPF paragraph 76 provides flexibility for the Parish to define in Local Green Space policy any very special circumstances that may support opportunities for development on the land. Defining such circumstances in Local Green Space Policy has many precedents, including a similar approach in the Benson Neighbourhood Plan. Failure to do so also has its pitfalls and, for example, resulted in considerable difficulties following the 'making' of the Binfield Neighbourhood Plan by not defining any 'very special circumstances' where development, in this case an application for a new community facility, was sought after the neighbourhood plan was made.

Policy LNP 8 therefore includes the following -

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

The Diocese of Southwark's Regulation 16 submission (paragraph 17) incorrectly references policy LNP 8 and concludes that community assets could not be provided on locations designated as Local Green Spaces. The Parish Council believes that this is incorrect.

Comments by the Diocese of Southwark on the Neighbourhood Plan Process

(5) In paragraphs 13 and 15 of their Regulation 16 submission, the Diocese of Southwark questions the validity of the Household Survey undertaken as part of the neighbourhood plan process in April and May 2017.

The Parish Council would point to the following-

In summary, there are 1,451 households in Limpsfield, 440 responses represent 30.2 % of Limpsfield households.

395 of the 440 completed Household Survey questionnaires, specified sites for Local Green Space designation.

Of the 395 responses, 90.4% of respondents included the Glebe Field and Glebe Meadow when asked to name sites for possible designation as Local Green Spaces.

Only 18 % of survey respondents lived in a road adjacent to the Glebe Field/ Glebe Meadow or Brook Field.

To ensure the independence and validity of the Household Survey The parish council engaged AECOM Infrastructure and Environment UK Ltd to assist with the preparation of the survey and the analysis of the survey results.

(6) In paragraph 14, the Diocese of Southwark also questions the involvement of the three parish councillors residing in Detillens Lane (which adjoins the Glebe) in the Neighbourhood Plan process and hints at their undue influence on the Local Green Space decision making process.

The Parish Council believes this inference to be totally baseless and without foundation.

It should be noted that at the joint meeting of the Parish Council and the Neighbourhood Plan Steering Group on 30th August 2018 at which the Regulation 16 version of the Neighbourhood Plan was formally approved for submission to Tandridge District Council, 6 parish councillors were present (including 2 residing in Detillens Lane). The plan document was approved by a vote of four to zero, the two councillors living in Detillens Lane abstained.

None of the councillors voting to approve the Regulation 16 Neighbourhood Plan document were Detillens Lane residents.

It should also be noted that the Limpsfield Parish Council Members Code of Conduct provides clear guidance regarding the Registration of Interests and the disclosure of pecuniary interests.

(7) Paragraph 10 of the Diocese of Southwark Regulation 16 submission states the following –

“In becoming aware of Limpsfield Parish Council's objectives to impose a LGS designation on the land, the landowners made the Parish Council aware of their rigorous objection to such a proposal.”

and

“the lack of early discussion with the landowners to fully understand the landowner's reasons for not having as yet developed the land but with clear intentions to do so if the need arose, shows complete disregard to the objectives and needs of the landowners.”

The Parish Council believes these statements to be factually incorrect. The Diocese of Southwark makes reference to their meeting with the Parish Council in August 2018, but make no reference to the earlier meeting between the Diocese of Southwark and the Parish Council in October 2017 at which the possible Local Green Space designation was one of the subjects discussed.

A copy of the minutes of the October 2017 (which had been agreed by both parties after that meeting) were sent to the Diocese of Southwark before the August 2018 meeting, because the Diocese of Southwark had no record of the October 2017 meeting.

In paragraph 12 of the Diocese of Southwark's Regulation 16 submission states-
"the Parish Council showed intransigence in their willingness to review their proposals"

The Parish Council believes this statement to be factually incorrect, because it makes no reference to the letter sent by the Parish Council to the Diocese of Southwark dated 20th August 2018 which included the following-

"Whilst the Parish Council does appreciate the grounds for the Diocese's objection, it was felt that without any comfort or understanding between us regarding the future use of this valued community space, that there were insufficient grounds to justify the removal of these sites from the list of proposed Local Green Spaces."

and

"But it was also the view of the Parish Council, that if there is the prospect of an agreement or understanding regarding the future of the Glebe Field and Glebe Meadow, the Parish Council would welcome the opportunity to have this conversation, in the hope that we might reach some form of agreement with the Diocese which would provide greater scope for the Parish Council to consider changing its position on the proposed Local Green Space designation."

The Parish Council received no response to this letter.

Response to St Peter's Church Limpsfield Regulation 16 Submission

(1) When Limpsfield Parish Council evaluated sites for potential Local Green Space designation, the Parish Council considered the principles established in the 2012 National Planning Policy Framework (NPPF), and used four tests for identifying potential Local Green Space across the parish.

Test 1. Does the site already have planning permission, or has it been allocated for development in the Tandridge Local Plan?

Test 2. Is the site reasonably close to the community it serves?

Test 3. Is the site local in character and not an extensive tract of land?

Test 4. Is the site demonstrably special to the local community?

It is the Parish Council's view that the Glebe Meadow site clearly passes these four tests.

The Regulation 16 submission by St Peter's Church Limpsfield, has provided no counter argument or evidence to the contrary.

(2) The Parish Council which continues to enjoy a close working relationship with St Peter's Church, understands that the Parish Church is the lessee of the Glebe Meadow and in turn has granted a 10- year licence in 2018 to the Panda Nursery located in the Glebe Meadow. The Parish Church's Regulation 16 submission references the children's nursery and states that agreement for the nursery would have been very difficult to obtain if the Glebe Meadow had been designated as a Local Green Space.

As set out in Item 4 (page 7) it is the Parish Council's understanding that this would not be the case and that such flexibility which allows community facilities to be provided on designated Local Green Spaces is an established practice in drawing up Local Green Space policy. The Parish Council strongly supports this principle, which may for example allow the future provision of a playground in the Glebe Meadow. The wording of policy LNP 8 supports this principle.

(3) In their Regulation 16 submission St Peter's Church also states that the Parish Council objected to the planning application for the Panda Nursery in the Glebe Meadow. This statement is incorrect.

The Parish Council objected to the first planning application (2017/1010) which was subsequently withdrawn and replaced by planning application 2017/1905, which the Parish Council supported and was approved by Tandridge District Council.