

Appendix Three

**LIMPSFIELD NEIGHBOURHOOD PLAN REGULATION 16 REPRESENTATIONS  
(TANDRIDGE DISTRICT COUNCIL)**

The Parish Council would like to thank the Examiner for the opportunity to respond to the comments submitted by Tandridge District Council.

It is pleased to note the support given to the plan as a whole and would like to thank the District Council for its thorough reading of the document and its identification of a number of typographical errors and small mistakes in the wording used in the Plan. The Parish Council acknowledges this and, in the main, accepts the changes that are proposed.

The Parish Council was disappointed that it did not have the opportunity to discuss the draft comments in detail before they were finalised and sent to the Examiner. Shortly after receiving any early draft of the comments, the Parish Council requested a meeting and started work on the comments. Its aim was to understand the draft comments and, as far as possible, secure agreement on what should be put to the Examiner. Unfortunately, due it is understood to a range of internal staffing issues at the District Council, a meeting did not take place until shortly before the submission and it was not possible at that late stage to secure agreement the detailed changes. The Parish Council and the District Council are, however, working closely to ensure that detailed factual and drafting corrections are incorporated into the Plan.

Our response to the District Council's comments are made in the recognition that there are three separate types of comment.

- Issues relating to the basic conditions test
- Drafting errors or omissions
- Other issues relating to the District Council's general aims. The District Council has set out its general aims for this (and presumably other) neighbourhood plans and then made a number of comments relating to those aims. The Parish Council has sought to respond to these where possible.

The District Council has not separated out its comments and the Parish Council has not categorised them. The Parish Council has responded to each on an equal basis and has sought to be positive in agreeing to detailed changes which improve the legibility of the Plan.

TDC Change No.	TDC Reference	TDC Comment	TDC Suggested Amendment	Parish Council Response
1	Whole NDP	<p>Tandridge District Council welcomes the Submission Draft of the Limpsfield Neighbourhood Plan. This document is acknowledged to be the result of a large amount of work, much of which has been done on a voluntary basis. Tandridge District Council congratulates the Parish Council on the completion of the document. It is acknowledged that the process has been demanding but the resulting document provides a useful plan benefitting Limpsfield.</p> <p>Tandridge District Council welcomes the changes to the plan which are in line with its previous recommendations. In particular this version of the plan successfully captures the essence of Limpsfield Parish and its setting. The Plan now reads as a local document – highlighting the individuality of Limpsfield and the landscape of its surrounds.</p>		The overall support being given to the Plan and the work done to prepare it is noted and welcomed

		The Parish Council/Steering Group have undertaken a large amount of consultation with locals and deserve commendation for this.		
2	Whole NDP	<p>It is noted that this Plan has been prepared using the National Planning Policy Framework of 2012 and not the more recent National Planning Policy Framework (2018).</p> <p>Likewise it is noted that the Neighbourhood Plan has been produced against the Tandridge District Core Strategy and the Local Plan Part 2 Detailed Policies document. It has only been considered alongside the emerging Local Plan in a few areas. The emerging plan – ‘Our Local Plan:2033’ has recently completed its Regulation 19 consultation (September 2018).</p>		<p>The Plan has been prepared using the 2012 NPPF and submitted for examination in accordance with the transitional arrangements.</p> <p>In drawing up the Plan, the Parish Council has worked with the District Council’s existing policies and sought to produce a plan which is in general conformity with those policies. However, the Parish Council has also taken into account of the District Council’s emerging policies and is not aware of any issues which would mean that it is not in general conformity with those policies as well</p>
3	Whole NDP	<p>Tandridge District Council’s Aims in Commenting.</p> <p>The document is supported as a whole.</p> <p>The plan reflects the aims of the Parish Council which is to protect character whilst not preventing future development.</p> <p>However some changes and clarifications are recommended and supported by</p>	None.	<p>Again, the Parish Council welcomes the overall support for the Plan.</p> <p>The Parish Council notes the District Council’s ‘aims’. It is not clear whether these aims relate solely to the Limpsfield Neighbourhood Plan or to a wider view on the drafting of Neighbourhood Plans emerging from within the Council. Some relate to the ‘basic conditions’ for a Neighbourhood Plan, others relate to drafting and soundness.</p>

		<p>Tandridge District Council. The Examiner is asked to consider these aims when assessing the Plan and when any recommendations for change are made. The intention is that the examiner knows Tandridge District Council’s viewpoint when recommending changes.</p> <p>Tandridge District Council would like the Neighbourhood Plan to;</p> <ul style="list-style-type: none"> <li>• Provide an approach which supports and builds on national policy and local plan policies. Policies in the Neighbourhood Plan should not repeat or revisit areas covered in other documents unless this is to add something new and specific to Limpsfield.</li> <li>• Support Local Plan Policies by not resisting the levels of development the District Council is seeking to implement (for example by allocating Green Spaces to resist infill development) or by introducing so many requirements so as to make development unviable.</li> <li>• Provide a clear policy base for applicants and development management officers. It should be</li> </ul>		<p>With the respect to the specific aims, the Parish Council would comment as follows:</p> <ul style="list-style-type: none"> <li>• The Plan does support and build on national and local plan policies. Where there is repetition this has a purpose in seeking to provide clarity and context at the local level.</li> <li>• The Local Plan does not seek to resist the levels of development sought by the District Council, either in its existing or proposed plans. LNP1 and the supporting text clearly indicate the support for appropriate new development and this is echoed elsewhere in the Plan. Similarly, in identifying local green spaces, the Parish Council has sought to follow the guidelines set for it. In proposing policies which seek to manage the form and nature of new development, it has based its approach on the particular character of the area and the reasonable desire to protect that without seeking to unduly constrain development</li> <li>• The Parish Council believes that there is a clear policy base and, as acknowledged by the District Council, considers the Plan ‘successfully captures the essence of Limpsfield Parish and its setting’</li> <li>• The Plan is clear about what it seeks to achieve – it has a clear vision; clear objectives and the policies seek to address those objectives. The Parish Council believes that this approach is in line with national planning policy and in general conformity with local strategic policies. It is noted that the District Council does not disagree with the policies or their content.</li> </ul>
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		<p>clear to applicants and developers what is permissible and what is not. Advice should contain no internal contradictions and be in line with national policy and local plan policies. It should provide a clear picture of what is sought for the neighbourhood plan area. Ideally policies should highlight what planning issues are most important and provide clear policies which address these issues.</p> <ul style="list-style-type: none"> <li>• The Limpsfield Plan needs to be clear about what it is trying to achieve. It seems in parts as if a decision has been made to include a particular policy which duplicates advice or provides a slightly different set of criteria and considerations from national or local policy. While Tandridge District Council does not disagree with the policies or in most part their content the result is a policy context which has slightly differing policies. This would make submitting an application and considering all the policies difficult and onerous with little clear gain for the area over the existing policy base.</li> </ul>		<ul style="list-style-type: none"> <li>• The Parish Council has sought to prepare supporting text which is appropriate in the context of the particular policy</li> <li>• Should the Examiner recommend changes to the policies, the Parish Council would expect the supporting text to change accordingly</li> <li>• The Parish Council acknowledges that references to other documents adds an extra layer of complexity but feels that this is warranted given the nature and role of those documents.</li> </ul> <p>The Parish Council accepts a range small drafting changes proposed by the District Council as shown below.</p>
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		<ul style="list-style-type: none"> <li>• The supporting text should explain and support the policies. At times aims are given in the supporting text but not reflected in the policies, and at other points the supporting text provides a slightly different approach to that provided in the policy itself. Likewise the Appendices provide additional advice which at times differs slightly from the policies in the plan.</li> <li>• Where Tandridge District Council recommends changes to the policy it has not included the necessary consequential changes to the supporting text. Generally however the Council would support changes that reflect amendments to policies.</li> <li>• The ease of use of the Neighbourhood Plan is compromised to some extent by the need to refer to supporting documentation and appendices. It is not an easy document to use.</li> </ul> <p>The Parish Council has been encouraged to consider these points but Tandridge District</p>		
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		<p>Council has found it challenging to see where these changes have been made.</p> <p>Much work has been done on the plan. Many amendments and changes have been worked into the document. Some final fine tuning could enhance its ease of use greatly. While it is acknowledged that the Steering group wants the plan to be completed quickly it is important that the final document is useful and easy to use.</p>		
****4		<p>Inconsistencies</p> <p>There are several inconsistencies found when reading though the whole plan. It seems like different parts have been written by different people and thus there is at times overlap and at times different approaches in different chapters. The District Council would ask the examiner to consider any changes to address this. References to the various development plan documents are inconsistent throughout the plan and should be changed as recommended or at least so as consistent.</p>		<p>The Parish Council is happy to accept any minor changes suggested by the District Council to address any inconsistencies which have inadvertently appeared in the Plan.</p>
5		<p>Consultation.</p> <p>The District Council recognises that the consultation undertaken has been particularly enthusiastically done. Villagers have been afforded great opportunities to make their comments.</p>		<p>As acknowledged by the District Council, a lot of effort has been put in to consultation and the results have been used to inform the final Plan.</p>

		<p>Occasionally, it is unclear how the results of this have been fed into the document. The Statement of Consultation was made available late in the day and while it makes the background clearer, it does not clarify this as much as it could.</p> <p>Likewise it is slightly unclear exactly what attempts have been made to contact landowners of Local Green Spaces though this may be clarified in a supporting document/online. The Steering Group has been advised to produce a table to show who was consulted when and how but has not done this. There is an assumption that where no response has been received it means there is no objection.</p>		<p>Comment. For the avoidance of doubt Appendix 2 contains a Local Green Space Summary of correspondence and meetings.</p>
6		<p>Some initial respondents in the process were not recorded by name/address by the steering Group and so Tandridge District Council tried to ensure that at Regulation 16 everyone living in the neighbourhood plan area was consulted.</p>		<p>Noted</p>
7	Paragraph Numbering	<p>As recommended previously the use of paragraph numbers throughout the document would be supported. (If any additional documents are produced page numbering would be beneficial.)</p>	<p>Include paragraph numbers.</p>	<p>Agreed</p>
8	Maps	<p>OS bases would improve maps. Maps are hard to interpret.</p>	<p>Improve maps.</p>	<p>Tandridge District Council is looking to resolve this.</p>
9	Foreword Page3 Para 3	<p>Typographical error - missing word.</p>	<p>Add 'The' before 'Domesday'.</p>	<p>Agreed</p>

10	Foreword. Page 5, 1st Paragraph	The Neighbourhood Plan Area was designated in June 2015 which suggests that the decision to make a Neighbourhood Plan was made earlier than January 2016. Correct to reflect the date of any Parish Council decision to make a Neighbourhood Plan.	Correct date if necessary or amend text to better reflect sequence of events.	Agreed. The date of the decision should be changed to March 2015.
11	Para 1.2	Clarify process to make it clear that after a referendum the District Council has to consider the plan and decide if it should be 'made'. N.B. This change should also be made in any revised Foreword.	Clarify process reflecting the appropriate stage the plan.	Noted. Revisions would be appropriate.
12	1.4	Consider adding the legal reference for these requirements. (The basic conditions are set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004.) Consider making it clear this is not a quote.	After 'conditions.' add ' as set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 as applied to neighbourhood plans by section 38A of the Planning and Compulsory Purchase Act 2004.'	Agreed
13	1.5	The reference to the Neighbourhood Planning Regulations should be to 'The Neighbourhood Planning (General) Regulations 2012'.	Delete '2012 Neighbourhood Planning Regulations (as amended) and replace with 'The Neighbourhood Planning (General) Regulations'.	Agreed

14	1.6	Correct reference to 'adopted'.	Delete 'adopted' and replace with 'made'.	Agreed
15	1.7	Correct reference to 'adopted'.	Delete 'an adopted' and replace with 'a made'	Agreed
16	1.10	Update reference to Strategic Environmental Assessment which was published in September 2018.	Delete 'a draft'. Replace with 'this'	Agreed
17	1.11	Amendment to better reflect the process.	After 'Council' delete 'for their review' and replace with 'to enable public consultation'.	Agreed
18	1.11	Amendment to better reflect the process.	After 'examination' delete 'and a public referendum' and replace with ', a public referendum, and then if satisfied with the plan 'make' it.	Agreed
19	Page 10 1 <sup>st</sup> paragraph	The second sentence seems incomplete.	Delete the sentence 'Located at the foot of the North Downs' and replace with 'It is located at the foot of the North Downs.	Agreed
20	Page 10 4 <sup>th</sup> paragraph, 2 <sup>nd</sup> sentence.	Typographical error.	Delete "St Peter's" and replace with 'St. Peter's'.	Agreed
21	Page 12	'LNP' is used. Use 'Limpsfield Neighbourhood Plan (LNP)' if this is the first	Delete 'LNP' and replace with 'Limpsfield	Agreed



27	Page 13 2 <sup>nd</sup> para	Unclear reference. It is unclear which paragraphs are considered more important. None are summarised in the paragraphs below.	Delete remainder of paragraph from 'and are summarised'	Agreed
28	Page 13	Paragraph 3 is out of date. Replace the whole paragraph.	Replace paragraph with 'Our Local Plan: 2033 went out to Regulation 19 public consultation in the summer of 2018. The Tandridge Local Development Scheme of March 2018 proposes adoption of this Plan around October to December 2019.'	Agreed
29	Page 13 4th para, 2 <sup>nd</sup> line	The correct terminology is to say when the local plan is 'adopted'.	Delete 'in place' and replace with 'adopted'.	Agreed
30	Page 13	Last paragraph add a sentence to reflect windfall sites.	'The Local Plan supports the use of sites within the built up area boundaries for housing where these become available and are suitable'.	Agreed
31	Page 14 1 <sup>st</sup> para	Paragraph is unclear.	Delete first paragraph starting 'While' and replace with 'Within Tandridge District it	Agreed

			is likely that land for new housing will need to be released from the Green Belt. The emerging Local Plan does not propose to release land from the Green Belt that immediately surrounds Limpsfield.	
32	Page 14 1 <sup>st</sup> paragraph	Consider relocating or removing this paragraph. At present it reads as if the 'Vision Preamble' is a conclusion of the engagement which to does not appear to be.	Remove 1 <sup>st</sup> paragraph on Page 14.	Agreed
33	Page 14 3 <sup>rd</sup> paragraph	Typographical error - incorrect capitalisation.	Replace 'neighbourhood Plan website with 'Limpsfield Neighbourhood Plan website'.	Agreed
34	Page 14 4 <sup>th</sup> para	Typographical error - incorrect capitalisation.	Delete 'Orange' and replace with 'orange'.	Agreed
35	Page 15 1 <sup>st</sup> paragraph	Typographical error – Use of colon not a full stop.	At end of 1 <sup>st</sup> para 'replace ':' with '.'.	Agreed
36	Page 15 Our Vision for Limpsfield box	As mentioned in previous responses from Tandridge District Council it is unclear if 'medium' and 'large' businesses are supported.	Delete 'Small' in 3 <sup>rd</sup> paragraph in box.	Not agreed. The vision is about the type of place which Limpsfield will be and the reference to thriving small businesses reflects that; a more generalised statement would detract from the individuality of Limpsfield and

				make the 'vision' more into an 'anywhere' vision. The vision does not prevent support for larger businesses to locate or expand as and when individual proposals come forward.
37	Page 18	Lack of clarity. The policies do not determine planning applications abut are used to do so.	Replace 'Land use planning policies determine planning applications' and replace with 'Land use planning policies provide the basis for determining planning applications'.	Agreed
38	Page 16 and 17 Objectives	It is unclear how objectives were decided upon. Do they reflect the results of the consultations? Open Space and Environment objective was taken from NPPF.	Consider adding a paragraph that explains how the objectives were agreed.	<p>The Parish Council's extensive public consultation is an important factor in the drawing of the objectives; however it would be wrong to ignore the other influences – national and local strategic policies and the work undertaken by the topic groups set up by the Parish Council</p> <p>If the Examiner is minded to recommend a change, the following is suggested:</p> <p>'The objectives for the Plan have been developed as part of the lengthy process of preparing the Neighbourhood Pan. They have been prepared against the background of national planning policy and local strategic policy and draw on the work of a series of topic groups and the results of extensive public consultation.'</p>
39	Page 17	Incorrect references to other parts of the document. The parking issue is now dealt with in LNP14 not LNP15. The reference in	Amend references throughout the document.	Agreed

		7a to Policies LNP4/11 is wrong. Performance indicators are now in Appendix C not D.		
40	Page 18 Second paragraph.	Lack of clarity. The purpose of policies is not to encourage or discourage planning applications. It is to provide clear guidance as to what is suitable /not suitable and to manage development.	Delete first sentence of second paragraph. Move second sentence of second paragraph to first paragraph.	Agreed
41	2 <sup>nd</sup> last para of Land Use Planning Policies box.	Make it clear that some heritage assets have been designated and some will be. Heritage assets are listed in Policy NP7.	Slight clarification suggested.	Agreed. Add the word 'further' between 'to be' and 'researched'.
42	Page 19	Typographical error in title – spelling.	Delete 'Spacial' and replace with 'Spatial'	Agreed
43	Page 19 LNP 1	Reflect any changes to naming of policies map in this section. (see below)		Agreed
44	Page 19 Policy LNP 1	It is somewhat unclear what this policy aims to achieve. While it sets out a useful description of how the development plan will be used and lists some of the main policies this description does not need to be a policy. Much of the policy repeats national guidance and other parts of the development plan. Remove this to supporting text.	This policy can be made into supporting text.	Disagree. This policy is important in setting the spatial framework for the topic-based policies which follow. Whilst it is acknowledged that there is some repetition of national guidance, this is in the context of the Pan's approach towards the definition of different parts of the Parish and the policies which relate to them.
45	Policy LNP 1 2 <sup>nd</sup> paragraph.	Delete 'and the relevant policies of the Neighbourhood Plan' as the Neighbourhood Plan is itself, once made, part of the development plan.	Delete 'and the relevant policies of the Neighbourhood Plan' in the second paragraph.	Agree in part. For ease of understanding, the Parish Council would suggest deleting 'and the' and replacing with 'including'.

46	Policy LNP1 2 <sup>nd</sup> paragraph	Delete last two sentences of paragraph 2. The first does not allow the plan to be up to date – more allocations may come forward within the plan period. The second sentence does not reflect the new NPPF. Deleting this allows the Neighbourhood Plan to remain up to date.	Delete last two sentences of second paragraph.	Disagree. The penultimate sentence is a matter of fact – the Neighbourhood Plan does not allocate sites and it is important to make this statement at this point. The same is true of the final sentence. If the emerging Local Plan were to allocate sites within the built-up area (although this is not currently the case) this would be part of the strategic planning process.
47	Policy LNP1 3 <sup>rd</sup> paragraph	This sentence repeats the NPPF and so should be removed.	Delete last sentence of Paragraph 3 which starts 'Inappropriate'.	Disagree. See comment 44.
48	Policy LNP1 last paragraph.	There is a Candidate AONB Area in part of Limpsfield and this designation should be mentioned in the policy.	After 'Areas of Great Landscape Value' insert 'or Area of Outstanding Natural Beauty Candidate areas'.	Agreed
49	Page 19 1 <sup>st</sup> para under LNP1 policy box	This paragraph does not reflect the Policy which it seeks to describe. Furthermore it supports sensitive development in the Green Belt/countryside which is not in line with government policy or the local plan.	Remove whole paragraph.	Comment. Whilst this paragraph is not essential and could be deleted, it seeks to reflect the approach of the plan in terms of its support for sensitive forms of development whilst protecting the character of the area.
50	Page 19 3 <sup>rd</sup> para under LNP1 policy box first sentence.	Correct referencing of document.	Replace 'Local Plan 2' with 'Local Plan – Part 2'	Agreed
51	Page 19 3 <sup>rd</sup> Para under LNP 1 policy box	Correct referencing of document	Replace 'Tandridge Local Plan 2' with 'Local Plan – Part 2'	Agreed

52	Page 19 3 <sup>rd</sup> Para under LNP1	The reader should be directed to the Local Plan for the current boundary of the Built up Area boundary – this may change over the lifetime of the plan. The Limpsfield NP might not reflect the latest changes. See comments on Policies Map.		Comment. The Parish Council considers the built up area boundary is appropriately drawn for the Limpsfield Parish and there is no indication that emerging policies would change that. In these circumstances it would seem appropriate to leave the paragraph as drafted.
53	Page 20 1 <sup>st</sup> parag	If the Aecom study is to be used to determine applications its findings /these areas should be included in the Neighbourhood Plan and /or referenced here. It should be made clear that the Parish Council supports Aecom’s approach.		Comment. The status of the AECOM Study which is referred to at a number of points has been raised separately by the Examiner. The Parish Council considers that, whilst it is a substantial document, it could reasonably be included as an Appendix to the Plan, rather than as a supporting document, to simplify access to the document.
54	Page 20 2 <sup>nd</sup> para	Unclear references as there are not separate policies for these areas. Clarify and update.		Agree. Minor redrafting would clarify this.  ‘The policies map also shows two areas that are particularly important in terms of community activity – the area ..... and Limpsfield Village (as defined by the Conservation Area Boundary, and including the Area around St Peter’s Hall). These areas are considered.....’
55	Page 20 2 <sup>nd</sup> para	Typographical errors.	Delete ‘St Peters Hall’ and replace with ‘St. Peter’s Hall’.	Agreed
56	Page 20 3 <sup>rd</sup> Para	Include Area of Outstanding Natural Beauty Candidate Area.	At end of paragraph add ‘Part of the parish is also designated as an Area of Outstanding Natural Beauty Candidate Area’.	Agreed
57	Page 20	This page repeats what is in the policy. Are both sections needed?		Comment. This page seeks to provide an understanding of the policy explaining the back ground and reasons why it has been proposed.

58	Page 21 1 <sup>st</sup> paragraph.	Change 'are' to 'is' to reflect that it's a single piece of land. Consider making it clearer that one piece of land is allocated as more than one green space.	Change 'are' to 'is'.	Agreed
59	Page 21 2 <sup>nd</sup> para	Correct reference.	Delete the word 'Spatial'	Agreed
60	Page 22 Policy LNP 2	<p>This policy aims to protect garden land once Policy DP8 of the Core Strategy is replaced with the emerging plan. The policy contains two elements – supporting housing in the built up area and garden land development. It is questionable whether the first part adds anything to the development plan but may be good to retain to express support for housing where suitable.</p> <p>The second element is about garden land which the Steering Group is particularly keen to protect. These two elements could be separated.</p> <p>Measuring the loss of biodiversity is difficult and it is questionable if this need should be included.</p> <p>In the last paragraph explain or delete the phrase 'will normally be resisted'. What is the exception here? Suggest avoiding the use of the word 'normally'.</p>	<p>Consider necessity of first section.</p> <p>If retained consider separating policy into two parts.</p>	<p>Comment. The Parish Council does consider the particular character of Limpsfield means that development involving residential garden land needs to be carefully managed and this is explained in the paragraphs that follow the policy. However, it is considered that the first paragraph is also important in demonstrating the Plan's commitment to delivering sustainable development. It is not considered there would be any significant benefit in separating this policy into two.</p> <p>Comment. Biodiversity is an important theme and the Parish Council would want to see new development managed to avoid any losses.</p> <p>Comment. The use of the word 'normally' is considered justified to provide some flexibility to allow for the different circumstances which may exist on particular sites. However the Parish Council would not object to its removal.</p>
61	LNP2 End of 1 <sup>st</sup> para	The whole of the development plan should be considered. This change also makes the policy simpler. This change should also be	Change 'Local Plan and the Neighbourhood Plan'	Agreed

		made in the first paragraph under the policy box.	to 'development plan'.	
62	Last paragraph.	The last paragraph is open to interpretation – how would a 'larger area' be defined and what would be the exceptions to what would 'normally be allowed.	Replace last sentence with 'Development that would compromise the future use of other pieces of land will be resisted. New developments should not create multiple entrances onto existing road frontages'.	Disagree. It is considered that this part of the policy is clear as drafted. The issue of tandem development and the formation of multiple accesses is about the character of the area as well as the way it would compromise other future developments.
63	Page 22 Last para	Update paragraph to reflect now published National Planning Policy Framework. Use full title of NPPF i.e. National Planning Policy Framework. Add NPPF in brackets if abbreviation is to continue in document. Change 'which' to 'that'.	Change 'NPPF' to 'National Planning Policy Framework, 2012'. Change 'which' to 'that'. Replace sentence commencing 'This approach is' with 'The new National Planning Policy Framework (2018) at Para 70 states that plans should consider policies resisting the inappropriate development of residential gardens where this would be	Agreed

			detrimental for instance to the local area.'	
64	Policy LNP3	<p>In bullet point 3 delete 'and other relevant evidence sources' as this removes ambiguity. Tandridge District Council is including this in its Housing Strategy.</p> <p>As recommended by Tandridge District Council the definition of smaller houses has been reduced from 4 bedrooms or less to 3 bedrooms or less in this version of the plan and this change is supported.</p> <p>Tandridge District Council wishes to see 2/3 bedroom houses – particularly 3 bed houses coming forward.</p> <p>Developments that encourage building that look like the existing area in terms of plot size/openness etc. but which are subdivided could provide an opportunity to do this while also meeting the Steering Group's aim of retaining the existing feel, plot size and appearance of the area. This has been mentioned to the group previously.</p> <p>It is questioned whether the reference to Policy 4 is necessary.</p>		<p>Comment on bullet point 3. The Parish Council is not convinced that there may not be other sources of evidence that might need to be taken into account.</p> <p>Comment on size of houses. Noted</p> <p>Comment on subdivision. Noted</p> <p>Comments on second to last paragraph. In including the penultimate paragraph, the Council sought to highlight the need to take account of the character of different parts of the Parish. However, it is acknowledged that character and density are addressed in other policies. The Parish Council would therefore accept the deletion of this paragraph if the Examiner considers that to be necessary in order to meet the basic condition on sustainable development.</p> <p>Comment on PD Rights. Noted; however, any application would need to be considered against the reason for which the condition was attached. Without such a condition there is a danger that new developments are designed in a form which enables the houses to be altered or extended as soon as they are practically complete.</p>

		<p>The second to last paragraph could be made clearer. What exactly would and would not be supported? What are the 'exceptional circumstances'? How would this be proved? This could allow for many changes to the proposed mix.</p> <p>The last paragraph seeks to remove permitted development rights for extensions/alterations which provide accommodation at first floor and above.</p> <p>Planning applications can be made for the removal of this condition.</p>		
65	Page 24	It is the Housing Strategy that provides information on this.	Delete 'Needs Assessment' and replace with 'Strategy'.	Agreed
66	Policy LNP4	<p>Issues are largely covered by Core Strategy Policies CSP18 and CSP 19. In the emerging 'Our Local Plan policy TLP18 covers similar aims.</p> <p>Part 6 – 'outlook' should be removed. In planning there is no right to a view. Should reference the proposed policy maximum. A map should be included which shows the different areas within the text at this point.</p> <p>The character area work prepared to support the Neighbourhood Plan should be</p>	In Section '6' of Policy LNP 4 after 'daylight' delete ', sunlight and outlook' and replace with 'and sunlight'.	<p>Noted. Whilst there may be some overlap, the Parish Council considers this policy is important locally in addressing the character of Limpsfield and should be retained</p> <p>Comment on outlook. The Parish Council recognises that private properties have no right to a view in planning legislation. Outlook, it is understood, is different, and the Parish Council considers it reasonable to use this terminology to address situations where the form and nature of proposed development could result in existing properties being unacceptably closed in.</p> <p>Noted</p>

		fully utilised to draw out the detail to make the policy specific to Limpsfield.		
67	LNP5	This policy revisits national policy. The last paragraph is a statement of intent and does not need to be a part of the policy – remove to supporting text.	Move last paragraph to supporting text.	Noted. Whilst it is acknowledged that there is an overlap with national policy, the policy is important in addressing at a local level this important conservation area at the heart of the Parish. The Parish Council would prefer to leave the last paragraph in the Policy given its clear role in developing the planning context for the Conservation Area.
68	LNP6	<p>Include reference to built-up area boundary map.</p> <p>Refers (twice) to the Character Management Principles set out in the Limpsfield Heritage and Character Assessment. This adds confusion and another document that applicants and development management officers would need to consult. This document is divided into 3 volumes on the Neighbourhood Plan website. While it appears comprehensive it is quite difficult to use for development management purposes. If the conclusions of this assessment are to be used for development management they need to be brought into the policy. (N.B.This document does not include the Local Plan’s Detailed Policies as part of the policy context.)</p> <p>Sub section number 3 could be reworded. Planning cannot protect views. It is also unclear where the distinctive views are and</p>	In final paragraph after ‘(AONB)’ delete ‘and’ and replace with ‘;’. After (AGLV) add ‘and AONB Candidate Areas’.	<p>Comment on cross reference to built-up area boundary. No objection but it is unclear whether this is necessary.</p> <p>Character Assessment. The Parish Council would be happy to see the assessment included as an Appendix. Although in three volumes much of its scale is down to the number of pictures. Bearing in mind that the document is referred to in the Regulation 16 submission, its incorporation as an appendix should be seen as a minor change.</p> <p>Comment on views. The policy relates to public views not private views and is therefore considered acceptable. The Parish Council does not have a formal set of viewpoints, but considers that the general policy should provide sufficient guidance to applicants and decision makers.</p> <p>Final paragraph. Agreed</p>

		<p>which public vantage points. The reference to development outside the built up area (i.e. in the Green Belt) slightly suggests that this development would be acceptable if it were not for the broken views.</p> <p>The final paragraph should mention the Candidate Area of Outstanding Natural Beauty.</p>		
69	Page 29 Second last para	<p>Our Local Plan: 2033 Policy TLP34 sets out that following the completion of the AONB review, any land which does not form the new boundary for the Surrey Hills will no longer hold the AGLV status and applications will be assessed in accordance with Policy TLP32 – Landscape character. The Neighbourhood Plan should address how it would address this change possibly by a review of this policy.</p>		<p>Comment. This is covered by the final paragraph of LNP6. However, in line with earlier comments it may be appropriate to refer to the Limpsfield Heritage and Character assessment as an Appendix and update the supporting text in the 3<sup>rd</sup> paragraph on page 29.</p>
70	LNP7	<p>Planning has no powers to prevent demolition of buildings in most cases (unless listed buildings and conservation areas) so this policy is in part redundant. It goes beyond the law. Planning permission is not required and thus there is no opportunity to apply such a policy. Buildings (over the prescribed volume) and walls/gates/fences in the conservation area would already have more protection from that designation than from this policy as in these instances consent for demolition is required.</p>		<p>Noted. The limitations of planning powers are acknowledged; however, the Parish Council considers it important to recognise the importance of local heritage assets and draw them in to the consideration of development proposals as part of a wider responsibility for securing forms of development which respect the character and heritage of the area.</p> <p>In the event that the Examiner considers a positively worded policy is required the following is suggested: ‘Proposals for development.....that would protect or enhance the significance of a local heritage asset, or, in the case of a building structure, enable its retention, will be supported’.</p>

		<p>The Parish Council's aim to review these assets could be removed to the supporting text. It is a statement of intent and does not need to be included in the policy.</p> <p>Consider replacing this policy with a positively worded one?</p>		<p>Comment on review. This is an important element of the ongoing work related to the planning of the area and the Parish Council would prefer to see it retained in the policy.</p>
71	Page 30 Last paragraph	<p>The work proposed would be onerous and it is questionable whether this would be valuable. Consider deleting the last sentence.</p>	<p>Consider deletion of last sentence.</p>	<p>Not agreed. The Parish Council considers this would be a valuable piece of work</p>
72	LNP8	<p>The District Council does not consider Green Spaces in the Green Belt (which already benefit from protection) to be necessary. Green Spaces LGS4 Land in front of the Carpenters arms and LGS6 (Land north of the A25) should be removed from this policy.</p> <p>It is unclear what 'very special circumstances' would be sufficient to mean development was supported. Using Green Belt terminology here is somewhat confusing.</p>	<p>Delete lines referencing LGS 4 and LGS6.</p> <p>Delete from ' , or some other' to end.</p>	<p>Not agreed. Guidance does not preclude the inclusion of sites within the Green Belt. The justification for including these sites is given in the supporting information and it will be a matter for the Examiner to decide whether a suitable case has been made.</p> <p>Not agreed. The phrase 'very special circumstances' was introduced to recognise that the policy has to have some, if limited, flexibility.</p>
73	LNP9	<p>CSP 17 of the Core Strategy provides similar advice to DP19 of the Detailed Policies document and TLP30/TLP35 of Our Local Plan. This policy should add something specific to Limpsfield if it's to be retained. At present it adds little to the existing policy framework.</p>		<p>Not agreed. The policy is supported by the Surrey Wildlife Trust and Surrey Nature Partnership subject to a proposed detailed change. Whilst there may be a degree of overlap, this adds strength to the overall policy approach of the Plan.</p> <p>Agree to add list of SSSIs.</p>

		<p>Has the agreement of Surrey Nature Partnership to be involved been agreed as yet? This has been mentioned to the group.</p> <p>Should the Staffhurst SSSI be included? Also mention SSSIs beyond the village boundary.</p> <p>It is virtually impossible to develop a site and maintain and enhance biodiversity. The aim should be to enhance biodiversity but it is noted this is hard to quantify.</p>		<p>Biodiversity. Not agreed. There is a wide variety of forms of development. Delivery of a net gain is clearly challenging but should be sought, if possible on site.</p>
74	Policy 9 and Page 35 4 <sup>th</sup> para under policy box	The policy could list these sites. This would add a local dimension to the policy.	Consider listing these sites.	Agreed
75	LNP10	<p>The Use Classes order allows for some changes of use without planning permission (some temporarily) and the Limpsfield Neighbourhood Plan must reflect this. At present the first paragraph of this policy does not. As has been explained to the Group previously this policy needs to be in line with the legislation. The policy needs to be rewritten to reflect the aims but not contradict existing legislation. It should address the issue of the need for a facility and how easily it can be replaced.</p> <p>Consider rewriting to state 'Where permission or prior approval is required etc.'. Alternatively this policy could be</p>	Rewrite policy as recommended.	Noted. If the Examiner is minded to accept this comment, add the words 'where permission or prior approval is needed'.

		<p>rewritten to be a more general statement supporting development that enhances the use of the town centre making it more dynamic/safer/used at night etc.?</p> <p>Why is homeworking supported 'in Limpsfield Chart and elsewhere'? Why not just say it will be supported where...it sounds as if it's only supported in some places which seems arbitrary.</p> <p>The loss of B1 is resisted in the first paragraph. In the second paragraph its provision (where the use has been retail) will be resisted at ground floor level. This is somewhat confusing. Could this be rephrased to make it clearer if this section is to be retained?</p> <p>Supporting more parking for cars is questionable. Could add mention of bicycle parking?</p> <p>Ensure policy clarifies that only part of the town centre is within Limpsfield Neighbourhood Plan area/Limpsfield.</p> <p>Change reference to 'Proposals' map to 'Policies' map.</p>		<p>Noted. If the Examiner wishes to see a change, delete 'in Limpsfield Chart....Parish.</p> <p>Comment re loss of B1. Not agreed. The intention is to retain where it exists as part of an overall approach to business but resist the further loss of A1-A5 uses where possible.</p> <p>Comment re parking for cars. Not agreed. The Parish Council sees it as reasonable to secure solutions to parking needs. The solution could take many different forms and the policy does not seek to discount any options, including additional cycle parking, at this stage.</p> <p>Clarification of Town Centre. By referring to the policies map and taking into account the known extent of the Plan further clarification of Oxted Town Centre should not be needed</p> <p>Reference to Policies Map. Agreed.</p>
76	LNP 11	Restrictive policy which does not support the objective.	Clarification needed.	Not agreed. It is considered that this policy provides a clear basis for considering proposals within the more rural parts of the Parish. For addressing special landscape

		Query use of term 'special landscape character'. Clarify what is meant by 'nature conservation interests'. The policy is confusing and contradictory in part. It needs to be clearer.		character reference can be made to the Heritage and Character Assessment
77	Page 39 2 <sup>nd</sup> para	Define/do not abbreviate SMEs. Policy does not reflect the 500-800 sq. foot demand given here. What about tourism?		SME abbreviation. .Agreed  Business demand. Noted. It is felt that the policy with its focus on small scale enterprise does address demand.  Tourism. The Parish Council has not sought directly to address tourist facilities in the Plan.
78	LNP 12	Make it clear only part of the town is part of Limpsfield.		Comment. This appears to be clear in the document and is not specifically an issue with regard to the site in question
79	3 <sup>rd</sup> para under policy box	While no changes are currently proposed to the District Council office's location the District Council does not want the policy or supporting text to resist the relocation of the District Council Offices should this become necessary in the future. Remove reference to District Council Offices.  Taking a planning perspective it is considered that the third paragraph under the box could cause future confusion. Add the word 'community' before 'services'	Remove references to District Council offices. Add the word 'community' before 'services'.	Agree in part. The Parish Council would not support the removal of Tandridge District Council Offices from the site and it is understood that the District Council is not suggesting this. The policy does not preclude the District Council from moving its offices (which fall, the District Council advises, within Use Class B1) to another site. However, it properly identifies the area as a location where community services can be extended and seeks to ensure that the ongoing role of the area in providing community services is not prejudiced by any new development proposals. The site of the Council offices is integral to the area as a whole and the policy is not considered to conflict with the 'basic conditions' which the Examiner is asked to consider.  The addition of the word 'community' before 'services' in the third paragraph is agreed.

80	LNP13	<p>Tandridge District Council questions whether this is a land use policy. Could it be made into one? Could include Assets of Community Value?</p> <p>Why is second para under box part not included in the policy?</p> <p>Could the policy mention the support for a play area?</p>	<p>Can I clarify that the comment refers specifically to the third paragraph under the policy box on page 40. Sarah and Emma are wholly supportive of the policy as worded in the box however reading the third paragraph from a planning perspective throws a different light on the policy and could cause confusion for planners in the future. Sarah has suggested that the last sentence of that paragraph should include the word "community" before the word "services" and hence read as follows:</p> <p>"The community services provided from within this area</p>	<p>Comment. A minor error in the TDC comments is noted (and this is, it is understood, agreed by the District Council) in that the comment in the 'TDC suggested amendment column' was included by mistake.</p> <p>The Parish Council is reluctant to tighten the first paragraph of LNP13 to specific use classes. As drafted, the policy allows for some flexibility in this respect.</p> <p>Comment. The second paragraph reflects a general approach to the area around St Peter's Hall but is not considered sufficiently developed to appear as policy.</p> <p>The Parish Council would have no objection to making a specific reference to play area facilities which would reflect comments in the public consultations. This could be added to the policy in line with the last paragraph on page 42.</p> <p>Given the separate legislative background for assets of community value and the stage which the Plan has reached it is not considered appropriate to incorporate them into the policy.</p>

			<p>help meet the needs of the Parish and the wider area and it is important that they are retained". If I am right I think this fully aligns with your views expressed in the meeting today and will avoid any doubt going forward.</p> <p>I have copied Emma in to this email and have already discussed this point with her.</p>	
81	Page 42	<p>Support for a playing field came through from the consultation work. There has been some disagreement within the group as to whether this should be supported but the impression is that most do support this. While an addition to the supporting text of policy LNP13 has been included in the regulation 16 document an additional policy or section /mention in Policy LNP 13 could increase the likelihood of achieving this. It should be noted that that Tandridge District Council's Open space Assessment provides that the High Street Playing Field</p>		<p>See above. The Parish Council has sought to allocate the playing field area as local green space. This has been objected to. If the Examiner were to agree with this objection, he is asked to incorporate a clause into Policy LNP13, such that the existing community facilities within this area retain an appropriate level of protection in line with Tandridge District Council's open place assessment and the Parish Council's support for community facilities.</p>

		in Limpsfield could be upgraded to include a park or youth play space.		
82	LNP14	Doesn't really address objective. Tandridge District Council recognises the support for a car park but questions whether this is in line with government policy. Funding for public transport will not be forthcoming if little development takes place. Clarify that not all Oxted Town Centre is not in Limpsfield.		Comment. The Parish Council considers the policy does address the objectives as set out on page 17 and is in accordance with the principles of sustainable development. It addresses walking cycling, public transport and the introduction of electric cars. Given the particular issues of Oxted Town Centre and Limpsfield Village, it is appropriate to include this although as indicated in the comments on LNP10, the Parish Council does not wish to pre-empt the nature of the solution.
83	Last para page 45	There is a mismatch between the objective/policy / supporting text.		The Parish Council considers that this paragraph is helpful in guiding the response to development without having the status of a formal policy.
84	LNP15	Requiring connectivity statements is overly onerous particularly for small development proposals. What does this policy achieve over Local Plan policies? First paragraph is questionably not policy.		Comment. To make the provision of connectivity statements less onerous, the requirement might reasonably exclude householder developments.
85	Reference to Policies Map	Tandridge DC would prefer the term 'Policies Map' refers to the Local Plan's Policy map and maps within the neighbourhood plan are given a different name. The areas covered by policies will be copied over to the Local Plan Policies Map and should be on one map.		Comment. The Parish Council is happy to consider and agree appropriate terminology.
86	Page 52	The boundary for policy LNP 4 (Limpsfield Centre) extends into the Green Belt. Given the policy supports development that meets the stipulated guidelines this gives a confusing message – remove this area that		Comment. Whilst there is an overlap it is felt that the Green Belt (which is a general development policy) and LNP4 (which is a design policy) can work side by side. For the avoidance of doubt a brief extra statement can be added to the supporting text to LNP 4.

		extends into the Green Belt from the designated LNP 4 area.		'The character areas identified in the Heritage and Character Assessment extend at some points beyond the built up area boundary. This policy relates solely to those parts of the character area within the built-up area. Policies for areas outside the built-up area are dealt with separately.'
87	Map	Landscape Character Areas map is unclear. Hard to interpret for applicants, officers and members		Comment. This is to be addressed through new mapping being looked at by Tandridge District Council
88	Maps	Tandridge District Council would prefer the spatial policies are added to the district wide mapping. Mapping within the document should be referred to differently to avoid confusion.		Noted. This can be achieved in the transfer of maps to the District Council system.
89	Appendix A	<p>This list of documents does not seem to accurately reflect the documents used/available for use. References should be complete and accurate. Abbreviations should not be used.</p> <p>The section on Tandridge Local Plan Documents should include the emerging local plan 'Our Local Plan: 2033'.</p> <p>Add Surrey Minerals and Waste Local Plans.</p> <p>Surrey Landscape Character Assessment Report (2015)</p> <p>Surrey Hills AONB Areas Search Natural Beauty Evaluation (2013)</p>	<p>In the section for Tandridge Council documents ;</p> <p>Add 'Our Local Plan :2033' to list of Tandridge Local Plan Documents.</p> <p>Draft Housing Strategy 2018</p> <p>Include Landscape Capacity and Sensitivity Study (2016-2018)</p> <p>Change 'Policy LP2' to 'Tandridge District</p>	Noted. The list of documents could be deleted from the Plan itself but referred to as background documents and held on the Parish Council web-site.

		Surrey Hills Area of Outstanding Natural Beauty (AONB) Management Plan 2014-2019 (prepared by Surrey Hills AONB Board)	Council Local Plan Part 2 – Detailed Policies 2014 -2019 (Local Plan Part 2)’.  Remove ‘Planning for a Healthy Environment’ to a new section entitled ‘Other Documents’.	
90	Appendix B	<p>Gives guidelines which would be more appropriately included as policy in LNP4. It is confusing to have policies, appendices and other documents to refer to. Where possible these sections should be brought together so it is easy for applicants and officers to use.</p> <p>Appendix B does not include design guidance for Limpsfield Chart. If this is not to be included remove map depicting this area on page 53. If it is to be included it should be made clear in the text that development would only be supported where it fulfils green belt tests. Likewise with the area of central Limpsfield that extends into the Green Belt on the map on page 52.</p> <p>Are policy guidelines really that useful? Many are quite obvious and covered by national policy/local plan policies.</p>	Consider including policy guidelines in actual policy.	<p>Comment. The Parish Council considers the guidelines are better retained as an Appendix given their detail and relationship with individual and small areas. Whilst some may be considered obvious, overall they provide an important set of guidelines for development control. At this level of detail, it was not felt appropriate to be more specific in defining the areas and it is felt that the guidelines can reasonably be interpreted for development control purposes.</p> <p>Comment Limpsfield North (v). Agreed – delete ‘and view’.</p> <p>Limpsfield Chart has not been specifically included as it is within the Green Belt and not identified as a settlement within the Green Belt. It is covered more broadly through policy LNP6.</p>

		<p>Slightly confusing where areas start and end e.g. 'the central section of Bluehouse Lane'.</p> <p>Section 'v' states that views should be protected which is not a principle of planning in Britain.</p> <p>Would be good to add clarity here as to whether applicants need to look at the full report as well as the appendices.</p>		
91	Appendix C	<p>Page 61 – Monitoring (3b) indicator – 'number of planning applications achieved in the Green Belt for inappropriate development'. Needs rewording – no planning permission is given where development is inappropriate. Make it clear the reference is development usually considered as inappropriate in green belt.</p> <p>Query whether residents' survey should be supplemented by more quantitative indicators.</p>		Agreed. Redraft 'number of planning permissions granted for developments which would normally be considered inappropriate in the Green Belt.
92	Appendix D	<p>Page 66 - Considering 'extensive' to be 10 ha seems arbitrary and large.</p> <p>This analysis of Local Green Spaces would be improved by the addition of a simple table showing which site meets which criteria.</p>	Add a table which shows which sites meet the requisite criteria.	Noted. At this stage the analysis is as shown and it will be for the Inspector to decide on each site. See separate response on LGS 1-3

93	Appendix G	Page 80 the Limpsfield Local Plan may be made in June or July because of Tandridge District Council Committee Dates. The plan will be 'made' not 'adopted'.	Amend dates to read June/July. Change 'adopted' to 'made'.	Agreed
94	Glossary	Page 83. As per previous comments it 'Use Classes Order' not 'User Classes Order'. This list does not include all the uses mentioned in the plan.	Changes 'User Classes Order' to 'Use Classes Order'.	Agreed
95	Statement of Consultation	Area was allocated after date of decision to produce a plan (as per previous comment).  Reference to a paper evidence file the examiner may wish to see – could it be put online if has not been done? Group say all documents are online.	Clarify re date of decision to produce a plan preceding allocation of area.	Noted. To be addressed.
96	Basic Conditions Statement	Produced late in the process. No comments on contents.	No change.	Noted
97	SEA report	No comments.	No change.	
98	Viability Assessment Housing Type and Mix LNP3	This report is unconvincing. It does not provide evidence how policy LNP3 will not make some developments unviable.		Noted. The report together with the more general justification is considered sufficient for the purposes of the policy and the Plan.