



DRAFT  
STRATEGIC ENVIRONMENTAL  
ASSESSMENT REPORT

Published by Limpsfield Parish Council in accordance with EU Directive 2001/42 on Strategic Environmental Assessment and with the Environmental Assessment of Plans & Programmes Regulations 2004 to accompany the publication of the Limpsfield Parish Pre-Submission Neighbourhood Plan

JUNE 2018

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## NON-TECHNICAL SUMMARY

1. The purpose of this report is to provide an assessment of any significant environmental effects resulting from the policies and proposals of the Pre-Submission version of the Limpsfield Parish Neighbourhood Plan. The Neighbourhood Plan has been published for consultation by Limpsfield Parish Council.

2. In September 2017, the local planning authority, Tandridge District Council, published a Screening Opinion that concluded that although Limpsfield Neighbourhood Plan would not allocate housing sites and contains policies that aim to protect the natural and historic environment, the effect on the environment is unknown and therefore as a precautionary approach, a Strategic Environmental Assessment (SEA) should be undertaken.

3. This Draft SEA report provides an assessment of the draft policies of the Pre-Submission policies of the Neighbourhood Plan in a way that is proportionate to this task and that recognises the limitations of the available data and means of measuring direct impacts.

4. The key objectives of the Limpsfield Neighbourhood Plan are summarised as follows:

- a. Housing and Development – Establishing design, type and mix standards for development as well as protecting the open countryside outside of the built-up areas.
- b. Design, Heritage and Landscape – Setting key design characteristics for the built-up area of Limpsfield and separately its Conservation Area, paying special attention to the Landscape Character outside of the built-up area and defining and protecting local heritage assets.
- c. Environment and Local Economy – Promoting biodiversity, designating local green spaces, managing proposals to protect the rural landscape, and addressing market failure to provide good connectivity in the Parish. Supporting the rural economy, committing to improvements and protecting existing employment uses to ensure they remain viable and sustainable in the long term.
- d. Community Assets and Infrastructure – Protecting existing community facilities, promoting walking, cycling and the use of public transport, establishing a Green Infrastructure Network

5. In general, the Tandridge Local Plan discourages major forms of development in the Parish and seeks to protect rural areas such as Limpsfield. The emerging Local Plan does not propose to allocate any significant land for housing or employment in Limpsfield Parish given the constraints that exist, although land is likely to be allocated in Oxted and Hurst Green, which are within the same tier 1 settlement. These may impact on the Parish as regards services, infrastructure, traffic and parking.

6. A summary of the baseline information is contained in the separate Scoping Report, which is published as part of the evidence base for the Plan. The report notes the following main environmental characteristics:

- Designated Conservation Area and 82 Listed Buildings (including 3 Grade I and 8 Grade II\*)

- The north of the parish lies within the Surrey Hills AONB
- The majority of the parish lies within an Area of Great Landscape Value
- Staffhurst Wood Site of Special Scientific Interest (SSSI) lies in the south of the parish
- In addition, Titsey Wood SSSI lies just to the north of the parish boundary, and whose zone of influence extends into the parish

7. The evidence base shows that the key environmental issues in the Parish are:

- Heritage: many listed buildings and a significant area of Limpsfield village located within a Conservation Area.
- Landscape: the northern part of the Parish lies within the Surrey Hills AONB. The landscape plays an important role in the distinct rural nature of the area.
- Biodiversity: Staffhurst Wood SSSI is a nationally important biodiversity asset
- Flooding: Limpsfield is located in the upper catchment of the River Eden and parts of the Parish are within Flood Zone 2 and 3 and subject to riverine flooding
- Traffic: Traffic problems and speeds are an acknowledged issue on the High Street within the Limpsfield Conservation Area and there are locations within the parish that are monitored for air quality.

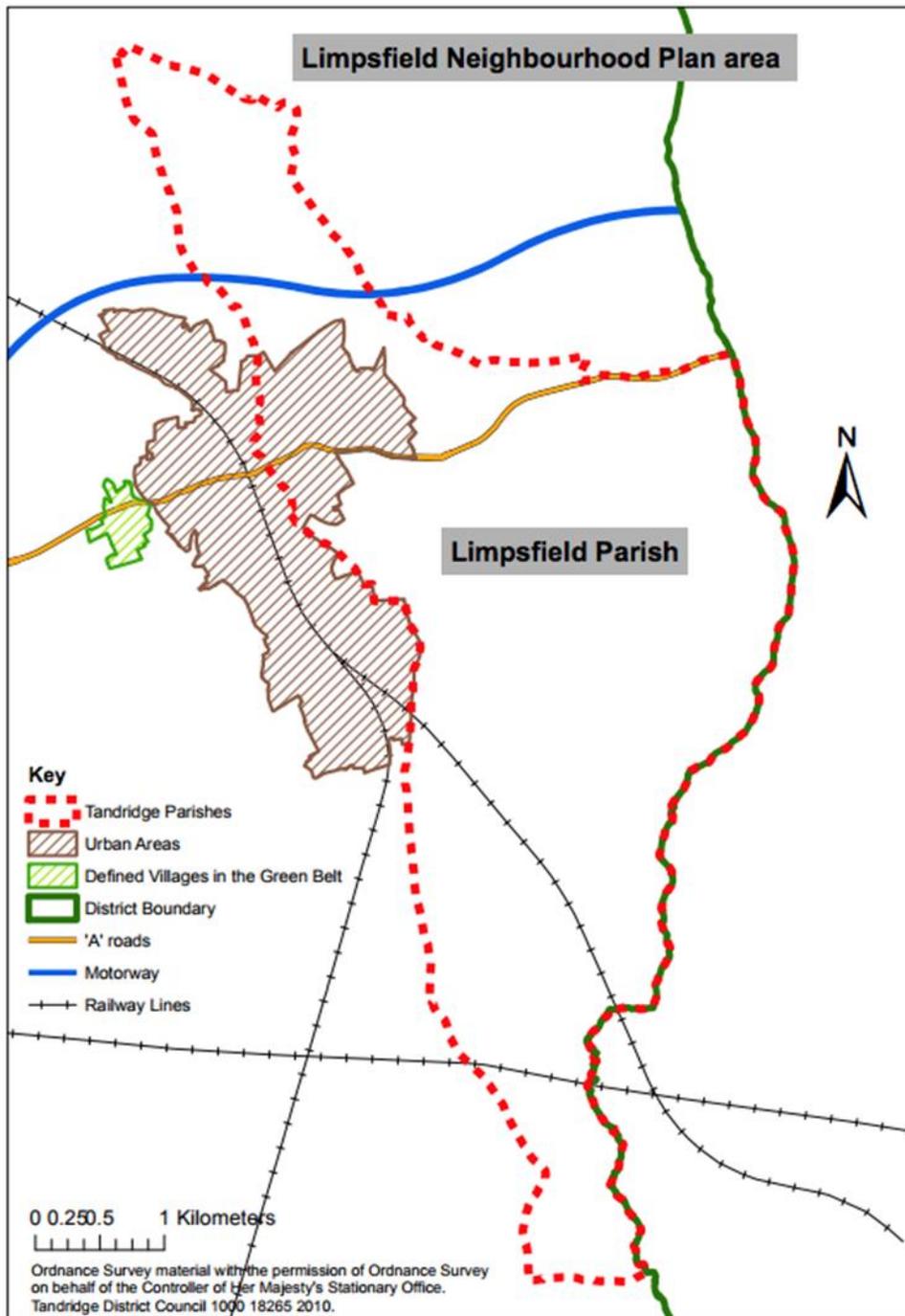
8. In overall terms, there is a close match between the Neighbourhood Plan objectives and those of the SEA. The environmental constraints are high in the Parish and the location is not one that is favoured in strategic policy as sustainable for significant new development. The aim of the Neighbourhood Plan is to protect the natural and historic environment and the potential for negative effects is assessed as a precautionary approach.

9. The analysis of the draft policies indicates that there is potential for a number of positive environmental effects. For the most part, the positive effects will be subtle, incremental improvements to the use of national and development plan policies. But, the policies have been drafted to avoid or successfully mitigate the potential for negative effects. In no case has the reasonable alternative to the chosen policy been assessed more favourably. For the most part, the policies offer a supplementary level of guidance to those of national or development plan policy so that those policies can be applied to this Parish.

10. Given the very modest scale of change planned for by the policies, there should be no in-combination or cumulative effects when taken together with other provisions in the imminent Local Plan for this part of the District. Further, the policies do not conflict with those of the Minerals & Waste Core Strategy which for the purposes of neighbourhood planning is 'excluded development'.

# 1. INTRODUCTION

1.1 The purpose of this report is to provide an assessment of any significant environmental effects resulting from the policies and proposals of the Pre-Submission version of the Limpsfield Parish Neighbourhood Plan, in accordance with EU Directive 2001/42 on Strategic Environmental Assessment (SEA) and with the 2004 Environmental Assessment of Plans & Programmes Regulations. Plan A below shows the designated Neighbourhood Area.



Plan A: Designated Neighbourhood Area

1.2 The Neighbourhood Plan has been published for consultation by Limpsfield Parish Council, as the 'qualifying body', in line with the Neighbourhood Planning Regulations 2012. In September 2017, the local planning authority, Tandridge District Council, published a Screening Opinion that concluded that although Limpsfield Neighbourhood Plan would not allocate sites and aims to protect the natural and historic environment, the effect on the environment is unknown and therefore as a precautionary approach, a Strategic Environmental Assessment (SEA) should be undertaken.

1.3 A Scoping Report was consulted on with the statutory bodies between March and May 2018 in line with the regulations and a final version of the Scoping Report dated May 2018 is available in the Neighbourhood Plan evidence library along with the Final SEA Screening Opinion.

1.4 This Draft SEA report provides an assessment of the draft policies of the Neighbourhood Plan in a way that is proportionate to this task and that recognises the limitations of the available data and means of measuring direct impacts.

## 2. BACKGROUND TO STRATEGIC ENVIRONMENTAL ASSESSMENT

2.1 The SEA tests the potential for significant environmental effects of the Neighbourhood Plan to ensure any harmful effects are avoided or satisfactorily mitigated. The SEA may also highlight where positive effects may be created and reinforced.

2.2 The methodology for the assessment is intended to be proportionate to the task of assessing the modest proposals of a community-led, Neighbourhood Plan. A summary of the process, as derived from the Planning Practice Guidance Flowchart of 2015 (ID 11-033), is contained in Table A below.

<b>The Strategic Environmental Assessment Process</b>	
<b>Screening</b>	<p><b>STAGE A:</b> This stage is undertaken by the local planning authority to determine whether the neighbourhood plan is likely to have significant environmental effects.</p> <p>If it considers there is the potential for such effects, then it issues an opinion to that effects. If it does not consider there is potential for such effects, then it must consult the statutory consultees - Natural England, Historic England and the Environment Agency – before issuing its final screening opinion.</p> <p>The qualifying body make choose to undertake an Assessment without obtaining a screening opinion.</p>
<b>Scoping</b>	<p><b>STAGE B:</b> This stage sets the context of the assessment by identifying the baseline data and establishing the scope of the assessment.</p> <ol style="list-style-type: none"> <li><b>1. Identification of relevant plans, policies and programmes.</b> Any existing requirements that need to be taken into account or incorporated into the plan are identified.</li> <li><b>2. Review of baseline information.</b> Data about environmental issues is collected, together with an indication as to how this may change in the future without the plan or programme under preparation.</li> <li><b>3. Identification of environmental issues.</b> The review of plans and policies, together with the baseline information are used to identify the key environmental issues which could impact the plan.</li> <li><b>4. Development of the SEA framework.</b> The assessment criteria used to assess the impact of the plan or programme.</li> <li><b>5. Identification of initial plan options.</b> Taking into account best practice initial identification of options and reasonable alternatives undertaken.</li> <li><b>6. Consultation.</b> On the scope and alternatives for assessment it is necessary to consult statutory consultees.</li> </ol>
<b>Assessment</b>	<p><b>STAGE C:</b> This stage involves the assessment of the any likely significant effects of the plan policies (and any reasonable alternatives) on the key sustainability issues identified.</p> <ol style="list-style-type: none"> <li><b>1. Finalisation of the Plan options and alternatives for testing</b></li> <li><b>2. Testing the Plan objectives against the SEA Framework.</b> The Plan Objectives are tested to understand how they relate to the framework</li> <li><b>3. Evaluation of plan policies and alternatives.</b> The SEA Framework is used to assess various plan policies by identifying their potential environmental effects and to assist in the refinement of the policies.</li> <li><b>4. Predicting and evaluating the effects of the plan.</b> To predict the significant effects of the plan and assist in the refinement of the policies.</li> </ol>

	<p><b>5. Consideration of ways to mitigate adverse effects and maximise beneficial effects.</b> To ensure that all potential mitigation measures and measures for maximising beneficial effects are identified.</p> <p><b>6. Proposing measures to monitor the significant effects of implementing the Plan:</b> To detail the means by which the environmental performance of the plan can be assessed and monitored.</p> <p>This is assessment is used to feed into the development of the Plan to help understand the environmental implications of the policies and the results are used to inform policy.</p>
<b>Reporting</b>	<p><b>STAGE D:</b> Preparation of the SEA Report</p> <ul style="list-style-type: none"> <li>The findings of the assessment together with how it has influenced the development of the plan are identified and set out in a draft report together with the recommendations on how to prevent, reduce, or offset any significant negative impacts arising from the plan.</li> </ul> <p><b>STAGE E:</b> Consultation – seek representations from consultation bodies and the general public</p> <ul style="list-style-type: none"> <li>This is an ongoing process. Consultation of the draft SEA Report is undertaken into account and used to influence further iterations of the sustainability appraisal process.</li> <li>The final report is published alongside the Plan as part of the submission documentation for independent examination.</li> </ul>
<b>Adoption and Monitoring</b>	<p><b>STAGE F:</b> Following the making of the Plan, the effects of implementing the plan are measured and any adverse effects are responded to. The results are fed into the future plans and assessments.</p>

Table A: SEA Process

2.3 Since the Scoping Stage B was completed, the focus has been on policy choice and formation on an iterative basis. As indicated in Sections 7 and 8, there have been limited alternative policy approaches available to assess using the framework of sustainability objectives. This has been achieved in general terms by comparison with a 'policy off' alternative.

### **3. NEIGHBOURHOOD PLAN OBJECTIVES & OTHER PLANS & PROGRAMMES**

3.1 The Neighbourhood Plan sits within a context of national and other local development plans that have an important influence on the nature and scale of change to be planned for in the Parish.

#### **The Neighbourhood Plan**

3.2 The vision of Limpsfield in 2033 is:

*"In 15 years time, Limpsfield Parish will be home to a strong, prosperous and increasingly sustainable community. The community will live in an area which has retained its distinctive but varied character and heritage; valued open spaces and Green Belt will have been protected, whilst changes and new development in the built-up area will have been managed to provide for future needs whilst preventing the particular character of individual roads and streets being eroded.*

*Small businesses will be able to thrive and the community as a whole will be supported by a range of local shops and services, primarily located in Oxted Town Centre, but also in Limpsfield Village and Limpsfield Chart.*

*Roads, footpaths, public transport and broadband will have been improved or managed to provide safer and more sustainable communications networks across the area."*

3.3 To achieve this vision, the key objectives of the Limpsfield Neighbourhood Plan are summarised as follows:

- a. Housing – Establishing design, type and mix standards for development as well as protecting the open countryside outside of the built-up areas.
- b. Design, Heritage and Landscape – Setting key design characteristics for the built-up area of Limpsfield and separately its Conservation Area, paying special attention to the Parish's heritage and landscape character both within and outside of the built-up area and defining and protecting local heritage assets.
- c. Open Space and the Environment – Promoting biodiversity, designating local green spaces, managing proposals to protect the rural landscape.
- d. Economy - addressing market failure to provide good connectivity in the Parish. Supporting the rural economy, committing to improvements and protecting existing employment uses to ensure they remain viable and sustainable in the long term.
- e. Community Assets and transport Infrastructure – Protecting existing community facilities and the promotion of sustainable travel and parking

#### **National Planning Policy**

3.4 The National Planning Policy Framework (NPPF) published by the Government in 2012 is an important guide in the preparation of local plans and neighbourhood plans. The Neighbourhood Plan must demonstrate that it is consistent with the

provisions of the NPPF. The following paragraphs of the NPPF are considered especially relevant:

- Supporting a prosperous rural economy (§28)
- Requiring Good Design (§58)
- Promoting healthy and inclusive communities (§68)
- Local Green Spaces (§76 & 77)
- Natural environment and landscape (§109 – 116)
- Heritage Assets (§126 - 135)

### **Local Planning Policy**

3.5 The Neighbourhood Plan must also be able to show that its policies are in general conformity with the strategic policies of the development plan, which currently comprises policies from the Tandridge Core Strategy 2008 (which predates the publication of the NPPF) and the Local Plan Part 2 – Detailed Policies adopted in July 2014. Hence the provisions of the NPPF are especially important in shaping how the LNP will consider its policies, until the emerging Local Plan advances towards adoption and replaces current policies.

#### Tandridge District Local Plan Part 1: Core Strategy (2008)

3.6 A number of policies in the Core Strategy are considered particularly important in setting the context for the Limpsfield Neighbourhood Plan:

- CSP17 Biodiversity – seeks to protect and enhance biodiversity
- CSP18 Character and Design – requires new development to be of a high standard and reflect and respect the character, setting and local context, including those features that contribute to local distinctiveness.
- CSP19 Density – limits development to 30-40 dwellings per ha unless a design solution can minimise the conflict with local character and distinctiveness
- CSP20 Areas of Outstanding Natural Beauty – identifies the principles to be followed for development within the Surrey Hills Area of Outstanding Natural Beauty (AONB) and the Tandridge District Area of Great Landscape Value (AGLV). AONBs are designated at a national level under the Countryside and Rights of Way Act 2000, whereas AGLVs are a local designation which TDC do not intend to role forward.
- CSP21 Landscape and Countryside – seeks to protect the landscape and Countryside for their own sake, new development will be required to conserve and enhance landscape character.

3.7 The policies all discourage major forms of development in the Parish, and seek to protect rural areas such as Limpsfield, hence why its distinct rural nature has been maintained.

## Tandridge District Local Plan Part 2 (LP2)

3.8 Tandridge District Local Plan Part 2 was adopted in July 2014 and replaced all the saved policies from 2001. It sets out the development management policies for the District. The Neighbourhood Plan should be in general conformity with the strategic policies of the (2008) development plan. Its policies can replace or take precedence over the LP2 development management policies if they are in conformity with the NPPF.

3.9 A number of policies are specifically significant to the parish of Limpsfield:

- DP1: Sustainable Development – Presumption in favour of sustainable development
- DP5: Highway Safety and Design – Sets standards expected for travel movements
- DP7: General Policy for New Development – Sets out criteria to be met for high quality design and safeguards amenity
- DP8: Residential Garden Land Development – Allows infilling and backland redevelopment in Limpsfield providing it meets a set of criteria
- DP9: Gates, Fences, Walls and other means of enclosure – Seeks hedging, shrubs or low wooden fencing in rural areas
- DP10 Green Belt – Permits development only in very special circumstances within the Green Belt
- DP12 Development in Defined Villages in the Green belt – Excludes Limpsfield Chart as a defined village in the Green Belt which could accommodate some infill housing
- DP13 Buildings in the Green Belt – Sets out the exceptions for new buildings in the Green Belt
- DP19: Biodiversity, Geological Conservation and Green Infrastructure – Support for development proposals that protect or enhance biodiversity and green infrastructure
- DP20: Heritage Assets – Seeks to protect and enhance heritage assets

## The Emerging Tandridge Local Plan

3.10 The Tandridge interim Local Development Scheme (LDS) published in June 2017 indicates the Proposed Submission Local Plan consultation will take place in 2018 with a target for adoption, following examination in 2019. The LDS will be updated later in 2018.

3.11 The examination and referendum of the LNP is likely therefore to come forward before the up to date Local Plan is in place and hence the provisions of Paragraph: 009 Reference ID: 41-009-20160211 of Planning Practice Guidance are likely to apply. Hence, why regard for the policies of the emerging plan in developing the policies in the neighbourhood plan will be necessary to ensure the neighbourhood plan does not become out of date in the early part of its plan period.

## Strategic Planning Context

3.12 While there is no requirement for the LNP to comply with the policies of the emerging Local Plan as these policies may change before they are adopted. The National Planning Policy Framework does require that neighbourhood plans are

"aligned with the strategic needs and policies of the area" and Planning Practice Guidance indicates that "the reasoning and evidence informing the Local Plan process may be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested."

3.13 An important role of the Local Plan will be to define the scale of new development that will be required in the District and to determine where it should be located. It is evident however that emerging plan does not propose to allocate any significant land for housing or employment in Limpsfield Parish given the constraints that exist, although land is likely to be allocated in Oxted and Hurst Green, which are within the same tier 1 settlement. These may impact on the Parish as regards services, infrastructure, traffic and parking.

#### Tandridge Green Belt Review

3.14 While new development will be required to meet the needs of the District this is likely to necessitate the release of Green Belt land. However, amendments to the Green Belt boundary are not proposed in the Parish.

#### **Other Plans & Programmes**

3.15 There are other development plans – Surrey Minerals Plan (2011) and Surrey Waste Plan (2008) - that apply in the Parish, but none are considered relevant for analysis of the environmental effects of this Neighbourhood Plan. The Surrey Hills AONB Management Plan 2014 – 2019 whilst not part of the development plan, places additional responsibilities on all public bodies and the planning system through Section 85 of the CROW Act (2000).

## 4. LOCAL ENVIRONMENTAL CHARACTERISTICS & ISSUES

4.1 A summary of the baseline information is contained in Appendix A of the Final SEA Scoping Report (May 2018), which is published as part of the evidence base for the Plan. The report notes the following main environmental characteristics:

- Designated Conservation Area and 82 Listed Buildings (including 3 Grade I and 8 Grade II\*)
- The north of the parish lies within the Surrey Hills AONB
- The majority of the parish lies within an Area of Great Landscape Value
- Staffhurst Wood Site of Special Scientific Interest (SSSI) lies in the south of the parish
- In addition, Titsey Wood SSSI lies just to the north of the parish boundary, and whose zone of influence extends into the parish

4.2 The evidence base shows that the key environmental issues in the Parish are:

- heritage (many listed buildings and most of Limpsfield village located within a Conservation Area)
- landscape (part of the parish lies within the Surrey Hills AONB, the landscape plays an important role in the distinct rural nature of the parish)
- biodiversity (Staffhurst Wood is a nationally important biodiversity asset)
- flooding (Limpsfield is located in the upper catchment of the River Eden and parts of the Parish are within Flood Zone 2 and 3 subject to riverine flooding)
- traffic (traffic problems and speeds are an acknowledged issue on the High Street within the Limpsfield Conservation Area and there are locations within the parish that are monitored for air quality)

4.3 The Countryside and Environment Report prepared by the Neighbourhood Plan team notes:

*“The parish of Limpsfield has a distinct rural identity and outstanding landscape setting, with lovely views and vistas, strong biodiversity and wildlife and an important conservation area. The Parish is 94% Green Belt, with extensive areas of National Trust and Titsey Estate woodland and common areas. These are very important to local residents.*

*The villages of Limpsfield and Limpsfield Chart are separated from larger conurbations by green spaces, and residents are very keen to protect this separation. Of particular importance are the Glebe and Brook fields which provide a vital local facility for recreation, dog walking and biodiversity, and a clear separation of Limpsfield from Oxted.*

*Conservation is a high priority and protection of the countryside and the environment are major considerations for the community.”*

4.4 Whilst there is little that the Plan can do to tackle the traffic issues in the Parish, it can seek to ensure the impact of traffic across the Parish and particularly on the Limpsfield Conservation Area are managed to ensure that future developments cause no environmental harm in association with the Local Plan. There are numerous public rights of way and rambler routes that cross the Parish and also a number of green spaces that can be protected to enhance the natural environment.

## 5. THE ASSESSMENT FRAMEWORK

5.1 The environmental objectives forming the assessment framework are set out in Table B below:

Objective Title	Objective	Headline Measures
Heritage & Landscape	To conserve and enhance landscape character and the historic environment.	<p>Will the Plan conserve and enhance areas, sites and buildings that contribute to the natural and cultural heritage of the District?</p> <p>Will the Plan preserve the setting, and avoid neglect leading to decay, of heritage assets?</p> <p>Will the plan maintain and enhance landscape character as defined by the character assessments and appraisals?</p> <p>Will the plan promote access to and enjoyment of the District's historic environment and countryside?</p>
Minimise pollution	To address the causes of climate change by reducing greenhouse gas emissions and be prepared for its impacts	<p>Will the Plan improve access to local services?</p> <p>Will the plan improve travel choices through the provision of a range of sustainable transport options including walking and cycling?</p> <p>Will the plan reduce the impact of development on dark skies?</p>
Biodiversity	To conserve and enhance biodiversity and geodiversity.	<p>Will the Plan avoid loss or damage to biodiversity or geodiversity?</p> <p>Will the Plan maintain or enhance existing on-site biodiversity assets?</p>
Flood Risk	To reduce flood risk from all sources of flooding.	Will the Plan seek to avoid development in flood risk areas taking into account the potential impacts on climate change?

*Table B: Assessment Framework of SEA Objectives*

5.2 The objectives have been selected to reflect the specific environmental issues of the parish and the scope and intent of the policies in the Plan. They are considered to be the most relevant to enable a proper assessment of the potential for environmental effects in this area and at this scale. No others were considered helpful to the analysis as it was not possible nor necessary to understand the effects of the Plan in that regard.

## 6. ASSESSMENT OF NEIGHBOURHOOD PLAN OBJECTIVES

6.1 A summary of the assessment of the Neighbourhood Plan objectives against the SEA objectives is provided in Table C below. A simple 'scoring' system is used to show positive (+), neutral (0) or negative (-) effects.

Neighbourhood Plan Objectives		SEA Objectives			
		Heritage & Landscape	Minimise Pollution	Biodiversity	Flood Risk
<b>1</b>	<b>Housing</b>	<b>0/-</b>	<b>+</b>	<b>0/-</b>	<b>0</b>
There is the potential for a series of neutral or negative effects of housing irrespective of its type or tenure. These effects can be avoided or reduced by the application of high quality design principles on all new development and by ensuring the density of new development has due regard to heritage and environmental objectives and by avoiding development in areas of flood risk.					
<b>2</b>	<b>Design, Heritage &amp; Landscape</b>	<b>+</b>	<b>0</b>	<b>+/0</b>	<b>0</b>
This objective will have clear positive heritage and landscape effects as the goal is to ensure the special character the Parish is given due prominence and that new development respects the heritage and landscape character in its particular location. While the other objectives are generally neutral there are opportunities through design to enhance any site-specific biodiversity assets.					
<b>3</b>	<b>Open Space and Environment</b>	<b>0</b>	<b>+</b>	<b>+</b>	<b>+</b>
There is a strong correlation between this objective and the SEA objectives, as the goal of protecting valued open spaces open and improving the quality of the natural environment chimes well with the principles of sustainable development.					
<b>4</b>	<b>Business and Economy</b>	<b>0/+</b>	<b>0/+</b>	<b>0</b>	<b>0</b>
This objective is generally neutral but could have positive heritage or climate change effects by encouraging the re-use of redundant farm buildings and by supporting local employment and reducing the need to travel to workplaces elsewhere in the District.					
<b>5</b>	<b>Community Well-being, Leisure and Recreation</b>	<b>+/0/-</b>	<b>+</b>	<b>0</b>	<b>0</b>
This objective could have positive heritage and climate change effects in encouraging the use of existing assets and discouraging their unnecessary loss that may lead to more trips by car to facilities outside the Parish. However, there is the potential for negative effects if the assets require improvements that may have heritage impacts. Conversely, the positive management of a community asset of heritage value may increase its long-term viability to invest in the necessary repair and maintenance of the asset, and the encouragement of improved pedestrian access to the village for visitors could also be positive.					
<b>6</b>	<b>Public Transport, Pedestrian Safety, Sustainable Travel and Communications</b>	<b>0/+</b>	<b>+/0</b>	<b>0</b>	<b>0</b>
This objective is generally neutral but could have positive climate change effects by encouraging sustainable travel and could have a positive heritage effect by managing through traffic and commercial vehicles in the High Street within the Limpsfield Conservation Area.					

*Table C: Assessment of Neighbourhood Plan Objectives*

6.2 In overall terms, there is a reasonable match between the Neighbourhood Plan objectives and those of the SEA. The environmental constraints are high in the Parish

and the location is not one that is favoured in strategic policy as sustainable for significant new development. The potential for negative effects principally relates to the desire of the local community to address the need for smaller homes in the existing built up area and improvements to community facilities that may be located in areas of heritage value.

## 7. ASSESSMENT OF NEIGHBOURHOOD PLAN POLICIES

7.1 The Neighbourhood Plan contains fifteen policies in pursuit of its strategic objectives. In Table D below these policies are assessed against each of the SEA objectives. Again, the information sets out the potential for positive (+), neutral (0) and negative (-) effects.

7.2 The Table also includes an analysis of any reasonable alternative policy options. For the most part, the only option is that of 'policy-off', which assumes no policy on the matter and a reliance on other national or development plan policy.

Neighbourhood Plan Policies		SEA Objectives			
		Heritage & Landscape	Minimise Pollution	Biodiversity	Flood Risk
<b>LNP1</b>	<b>Spatial Strategy</b>	<b>+/-</b>	<b>+</b>	<b>0/-</b>	<b>0/-</b>
<p>The policy will have positive landscape effects by containing and managing appropriate development within the Limpsfield built up area boundary to 2033 and avoiding development in countryside areas including Limpsfield Chart. This reflects the importance of the landscape and the distinct rural nature of the parish beyond the village boundary. The policy protects the countryside for its own sake and prevents encroachment unless in very special circumstances. It will also have a positive effect on minimising pollution and protecting existing biodiversity assets within the countryside. There could be negative effects from development coming forward within the River Eden flood risk area, but this is unlikely as there are other development plan policies seeking to prevent such harm. Similarly, there is also the potential for a negative heritage effect of any new development within the Conservation Area and/or the setting of a listed building or precious open space. Again, however, other national and development plan policies will assist in preventing such effects, as well as Policies LNP5 and 8 of this Plan.</p> <p>The alternative to the policy is to have no policy which may have negative landscape effects if the reliance on the use of the term 'built up area' in development plan policy allows for harmful development on the edge of the village and in the setting of the AONB. Given the built-up area boundary and Surrey Hills AONB boundary are largely coincident, alterations to the built-up area boundary would not be appropriate. In any case, this would undermine the character of the landscape and setting of Limpsfield village and could lead to higher local traffic levels, and other consequential negative effects. In which case, this alternative is poor in comparison with the policy option chosen.</p>					
<b>LNP2</b>	<b>Housing development within the Built-Up Area Boundary</b>	<b>+</b>	<b>0/-</b>	<b>0/+</b>	<b>0/-</b>
<p>The policy will have positive heritage effects in helping to ensure that future standards of development reflect local character. The policy may have negative effect on minimising pollution and flood risk due to development intensification, but this is likely to be minimal given there are other development plan policies seeking to prevent such harm. In conjunction with Policy LNP9, this policy could have a positive biodiversity effect as new development could create a biodiversity net gain through new ecological features.</p> <p>It is not possible at this stage to identify specific sites for housing and therefore the alternative to the policy is "policy off". The effect of no policy may be neutral or negative, however if the detailed policy (DP8) in the Tandridge Local Plan Part 2 is deleted, this may undermine the character of the area resulting in negative effects. In which case the alternative option would result in greater negative effects than the policy proposed.</p>					

<b>LNP3</b>	<b>Housing Type and Mix</b>	<b>+</b>	<b>+</b>	<b>0</b>	<b>0</b>
<p>The policy will have positive heritage and pollution effects by enabling suitable development that reflects local character and is accessible to local facilities and services.</p> <p>The alternative is having no policy and relying on the generic policy framework of national and development plan policy. Although it is possible that this may not lead to a different outcome, it is more likely that a mix of housing sizes that reflects local character and need would not come forward. In which case the positive effects of the policy may be lost in comparison with the policy option chosen.</p>					
<b>LNP4</b>	<b>Managing High Quality Design in the Built-Up Area of Limpsfield</b>	<b>+</b>	<b>0</b>	<b>0</b>	<b>0</b>
<p>Policies LNP 4, 5 and 6 seek to manage the design of development proposals within the Built-up Area of Limpsfield and across the parish as a whole - including the setting of the Limpsfield and the visual relationship between the settlement and the Surrey Hills AONB/AGLV. As such, the policies assess well against the landscape and heritage objectives but will also ensure the special character of Bledlow Village is maintained.</p> <p>The only alternative to the policies LNP 4, 5 and 6 would be no policies and for design management decisions to be made having regard to the Surrey Design guide and general District design criteria including the Trees and Soft Landscaping SPD. The Parish Council has prepared a new Character and Heritage Study (AECOM Study) for the Parish in addition to which the more detailed guidance on the Limpsfield sub-areas is available in the Appendix to the Neighbourhood Plan. This refines the AECOM Study to better reflect the particular characteristics of Limpsfield village. These policies ought therefore to lead to a better design outcome.</p>					
<b>LNP5</b>	<b>Limpsfield Village Conservation Area</b>	<b>+</b>	<b>0</b>	<b>0</b>	<b>0</b>
<p>In addition to the above, this policy requires applications to demonstrate through a Heritage Statement how the Conservation Area will be conserved and enhanced. It will have a positive heritage effect in encouraging high standards of design in the Limpsfield Conservation Area and its setting. The alternative of no policy may have a similar effect, though in the absence (at this time) of a locally specific Conservation Area Appraisal might make this outcome less likely.</p>					
<b>LNP6</b>	<b>Landscape Character</b>	<b>+</b>	<b>0</b>	<b>0</b>	<b>0</b>
<p>To complement the assessment of LNP4, the policy will have positive landscape and heritage effects in encouraging high standards of design outside the Built-Up Area Boundary and in the Surrey Hills AONB/Area of Great Landscape Value and Limpsfield Chart. The alternative of no policy may have a similar effect, but generic national and development plan policy loses the specificity of this policy and the positive effects may become neutral.</p>					
<b>LNP7</b>	<b>Local Heritage Assets</b>	<b>+</b>	<b>0</b>	<b>0</b>	<b>0</b>
<p>The policy has the potential for positive heritage effects by reinforcing awareness of a number of non-designated heritage assets that were previously identified by the District as 'Buildings of Character'. The policy requires a review of these earlier assessments and the addition of new buildings. The effect of no policy will bring uncertainty to the potential heritage effect given new non-designated heritage assets are unlikely to be identified.</p>					

<b>LNP8</b>	<b>Local Green Spaces</b>	<b>+</b>	<b>0</b>	<b>+/0</b>	<b>+/0</b>
<p>The policy will have a positive landscape and potential biodiversity effects by safeguarding from development unless in very special circumstances cherished open spaces, particularly those in Limpsfield Village that contribute to the character of the village and the setting of the Conservation Area. In this respect the policy could also have positive biodiversity and flood risk effects, given Brook Field is in an area of flood risk. The alternative of no policy may have a similar effect but as the proposed Local Green Spaces do not currently have any formal recognition their future would be uncertain.</p>					
<b>LNP9</b>	<b>Promoting Biodiversity</b>	<b>0</b>	<b>0</b>	<b>+</b>	<b>0/+</b>
<p>The policy seeks to have positive biodiversity effects by promoting and wherever possible enhancing biodiversity and reducing light pollution. Proposals that include water bodies to enhance biodiversity can also have a positive flood attenuation effect. The alternative of no policy may have similar effects, but generic national and development plan policy may provide insufficient local focus and the positive effects may become neutral. The Natural Environment and Rural Communities Act 2006 (NERCA) also places a duty on the Parish Council to have regard to the conservation of biodiversity whilst exercising its functions.</p>					
<b>LNP10</b>	<b>Employment and Business across the Parish</b>	<b>0</b>	<b>0/+/-</b>	<b>0</b>	<b>0</b>
<p>This policy which supports office, retail and 'home working' will have largely neutral environmental effects. However, by supporting the retention of office and retail facilities and by enhancing the retail offer in Limpsfield Village and Oxted Town Centre it has the potential to reduce vehicle trips to alternative facilities. This could therefore have positive climate change effects, and the alternative of no policy could have correspondingly negative effects.</p>					
<b>LNP11</b>	<b>Rural Economy</b>	<b>+/0</b>	<b>0</b>	<b>+/0</b>	<b>0</b>
<p>Policy LNP11 supports the rural economy through support for rural enterprise and the re-use of redundant buildings to serve the essential needs of agriculture and other land-based enterprises. The policy adds value to the existing policy framework by making specific policy provisions to support rural diversification and hence has potential positive effects on heritage, landscape and biodiversity. The 'Policy Off' alternative may have similar effects but may provide less local focus. This policy is intended to support a sustainable rural economy and to give local effect to the Rural Strategy set out in section 20 of the Core Strategy.</p>					
<b>LNP12</b>	<b>Community Services in Oxted Town Centre</b>	<b>0</b>	<b>+/0</b>	<b>0</b>	<b>0</b>
<p>Policies LNP12 and LNP13 acknowledge the need to protect and enhance critical community facilities which are essential to the vitality of the parish and the well-being of the community. The policy supports proposals intended to ensure the communities needs may be met over the longer term. While the environmental effects of this policy are limited, ensuring access and retention of key services in Oxted Town Centre could reduce the need to travel by car to alternative facilities. Again, the 'no policy' alternative is largely neutral, but would miss the opportunity to secure a longer-term community benefit.</p>					
<b>LNP13</b>	<b>Community Services in Limpsfield village and Other Parts of the Parish</b>	<b>+/0</b>	<b>+/0</b>	<b>0</b>	<b>0</b>

As set out above, enhancing the facilities in the Conservation Area and improving facilities across the Parish could lead to positive heritage effect and reduce the need to travel by car. The 'no policy' alternative is likely to be neutral but would miss the opportunity to secure a longer-term community benefit.					
<b>LNP14</b>	<b>Sustainable Transport, Access and Car Parking</b>	<b>+</b>	<b>+</b>	<b>0</b>	<b>0</b>
Policy LNP14 seeks to improve the traffic management arrangements on the High Street (within the Limpsfield Conservation Area) and increase the use of sustainable forms of transport throughout the Parish in part by enhancing existing Rights of Way network. This would have a positive climate mitigation effect and positive effect on the Conservation Area by reducing potential damage to heritage assets through improved routing of HGV's as well as other traffic managements and parking arrangements. This in turn would improve the attractiveness and greater vitality of the High Street. The effect of "policy off" would be to fail to address the currently unsatisfactory arrangements and the potential detrimental heritage effects.					
<b>LNP15</b>	<b>Connecting the Parish</b>	<b>0</b>	<b>0/+</b>	<b>0</b>	<b>0</b>
Policy LNP15 responds to the market failure to provide good broadband connectivity in the Parish and is a key infrastructure concern of the local community and is considered essential to support a thriving rural economy. Although it has few direct environmental effects, supporting local employment could bring positive benefits by reduce the need to travel to other employment areas. The 'no policy' alternative would not address this market failure and could lead to a greater need to travel.					

*Table D: Assessment of Proposed Neighbourhood Plan Policies*

7.3 The analysis of the Pre-Submission policies indicates that there is potential for a number of positive, and generally neutral environmental effects. For the most part, the positive effects will be subtle, incremental improvements to the use of national and development plan policies. But, the policies have been drafted to avoid or successfully mitigate the potential for negative effects. In no case has the reasonable alternative to the chosen policy been assessed more favourably.

## **8. SUMMARY OF ASSESSMENT**

8.1 The assessment of the draft objectives and policies of the Neighbourhood Plan indicates that the potential for significant environmental effects has either been avoided or successfully mitigated through careful policy wording. For the most part, the policies offer a supplementary level of guidance to those of national or development plan policy so that those policies can be applied to this Parish.

8.2 Given the very modest scale of change planned for by the policies, there should be no in-combination or cumulative effects when taken together with other provisions in the imminent Local Plan for this part of the District.

## **9. MONITORING THE ASSESSMENT**

9.1 The Neighbourhood Plan proposes that the progress on its implementation will be assessed using the measures for each objective set out in the Neighbourhood Plan Appendix. The data for some of these measures is collected by the District Council in its planning monitoring reports. In other cases, the Parish Council will endeavour to collect data on an annual basis to report on the progress of the Plan. Should any real or potential negative impacts be identified then the councils will seek to review the relevant policies and their implementation.