

# **LIMPSFIELD NEIGHBOURHOOD PLAN**

## **POLICY REVIEW 2025**

### **FOR INITIAL VIEW BY TANDRIDGE DISTRICT COUNCIL**

#### **July 2025**

#### **Introduction**

The Limpsfield Neighbourhood Plan (LNP or “The Plan”) was prepared by Limpsfield Parish Council (LPC) and adopted by Tandridge District Council (TDC) in 2019. It forms part of the Statutory Development Plan for the District, and its planning policies are adopted by Tandridge District Council as a Supplementary Planning Document (SPD) to which all planning applications in the Parish should refer and comply.

The Parish Council is now reviewing the LNP to decide whether there is a need for any of the policies to be formally reviewed or materially updated in terms of their principles.

This review document goes through the policies one by one, noting any remarks on the policy itself in terms of effectiveness or validity; concludes whether the policy principles are still valid; offers any “recommendations” for material or non-material changes (for determination by Tandridge District Council’s Neighbourhood Plan team) and notes any future actions to be undertaken.

In addition to the review of the policies, this document also separately examines a range of “Implementation Projects” that were identified in The Plan (p49-51) in terms of what we have been able to achieve to date, what has not yet been achieved (but is still possible) and what is considered not achievable following consultation with authorities such as Highways, Surrey County Council (SCC), Tandridge District Council or Cabinet Members/Government departments etc.

#### **General actions / suggestions for review by TDC’s Neighbourhood Plan team**

- Having carried out an initial review of The Plan, the LNP Review Working Group set up by the Parish Council has come to the view that there are no material changes that need to be made to The Plan at this time.
- There have, however, been changes to the National Planning Policy Framework (NPPF) which will have a material impact on the determination of some planning applications, and it is considered that these should be referenced in The Plan.
- Several other minor updates are considered appropriate, and it is suggested that these be dealt with through brief footnotes at appropriate points in The Plan. **Please see the attached Appendix which supplies all proposed footnotes and the locations for each.**

- **It is not proposed** that the various implementation projects referred to in the LNP be updated within The Plan itself. **We propose that Chapter 6, ‘Implementation’, is a separate document containing achievements and updates on the various Implementation Projects.**

#### Foreword:

We suggest the addition of a short paragraph noting that The Plan, was reviewed in 2025; that no material changes were proposed; that minor updates are incorporated by way of footnotes and that a separate review has been prepared updating the implementation projects. **See Appendix - Footnotes.**

#### NPPF Changes Summary:

- We suggest a footnote or paragraph in Section 3 “Planning Policy Context” [page 13] summarising NPPF-related changes likely to impact the LNP. This may then be cross-referenced as a footnote in relevant policies.

#### Glossary Update & Check:

- Check for any updates on business use classes (as proposed in LNP 11).
- Add new terms like “National Landscape”, “BNG”, ““Grey Belt””, “SPD”, “urban sprawl” etc to the Glossary.

#### Clarifications to seek from TDC:

1. Whether reference to ““Grey Belt”” (LNP 1, LNP 5, LNP 10) in a footnote constitutes a “material change”.
2. Whether updates to “LVCAAMP” references are material or non-material (LNP 4).
3. Whether any necessary updates of business class for commercial and community buildings (LNP 9–12) constitutes a material change.

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**Appendix 1 - containing proposed foreword and footnotes for consideration by TDC.**

**Supplementary Review of Implementation Projects [Chapter 6 of The Plan],  
including Infrastructure Projects**

## **Vision and Objectives**

- At the heart of the Neighbourhood Plan is a vision of the Parish as home to a strong, prosperous and increasingly sustainable community, a Parish which has retained its 'distinct yet varied character and heritage'.
- That vision remains as valid today as it was when the plan was written, and no changes are proposed.
- Underpinning the Vision is a set of objectives which together form the foundation on which the land use policies and the projects are based. These objectives have been examined in the context of the policies to which they relate and are considered to remain a sound basis for The Plan.
- Where appropriate, more specific information on the objectives is included in the assessment of the policies to which they relate.

### **To note [could be included in LNP if does not constitute material change]:**

The LNP is a working document (which runs from 2018 to 2033) and while the Vision and core principles of the policies remain the same, there have been a number of developments in recent years relating to planning (NPPF changes), infrastructure and connectivity that will have a bearing on what is achievable by the LNP and may also require updates to terminology, and area designation.

## **LNP 1 - A Spatial Strategy for the Parish**

### Remarks:

- The spatial strategy highlights the different approaches which will be taken towards development within the built-up area of Limpsfield and the open countryside outside the built-up area.
- The overarching strategy remains up to date and the boundary between built-up area and countryside remains unaltered.
- To note that 'Areas of Outstanding Natural Beauty' are now termed 'National Landscape'. Therefore, Surrey Hills AONB is now Surrey Hills National Landscape.
- Extensions to the Surrey Hills National Landscape are being considered (determination TBC) and, if accepted, will result in changes to the designation of areas currently considered Areas of Great Landscape Value (AGLV) to provide increased protection to more areas of the parish.
- However, it should be noted that with the new NPPF and "“Grey Belt”" provision, the Surrey Hills National Landscape (SHNL) will not necessarily protect land outside the built-up area completely from development. Exceptional circumstances may still apply.

### Conclusion:

The principles set out in Policy LNP 1 remain unchanged.

### Recommendations:

- Minor, non-material changes be made to the policy, and supporting text by way of a footnote to reflect the change in terminology from Area of Outstanding Natural Beauty to National Landscape
- Reference to Candidate AONB (National Landscape) areas in the policy and text be retained for the time-being and updated by way of a minor, non-material changes when the formal review by Natural England is complete. A footnote referencing the ongoing review to be added
- Question for TDC – could a footnote be added referencing the NPPF and the concept of "“Grey Belt”" and would this be a material or non-material change?

### Future actions:

To keep a watching brief on NPPF reforms including on Green Belt, the implications of the new "“Grey Belt”".

## **LNP 2 - Housing Type and Mix**

### Remarks:

- TDC's most recent Housing Strategy upholds the need for smaller dwellings.
- LNP 2 therefore remains in line with current policies.
- TDC's Housing Strategy also refers to 3-bedroom dwellings (but only in the context of larger developments). The LNP develops this further to single or smaller developments.
- LPC is happy in general that planning decisions in Limpsfield have largely upheld this policy, except for Priest Hill, which was subsequently discussed with Cliff Thurlow who, while the application was signed off by his predecessor, apologised for overlooking the LNP criteria in this instance.

### Conclusion:

On review of the policy, we believe the principles remain unchanged.

Recommendations: None

### Future actions:

- To keep a watching brief on NPPF reforms with regards to development within the urban area.

### **LNP 3 - Managing High Quality Design in the Built-Up Area of the Parish**

#### Remarks:

This policy does seem to have been successful with several applications being amended to comply with the LNP – particularly regarding the retention of distance to boundaries, infill and views to surrounding landscape.

[ e.g. 27 and 47 Park Road Limpsfield]

LNP 3 can be difficult to implement as it is quite subjective. Its success is more about planning officers / committees considering the policy for each application, which in the main, is being done. We now send the link to our LPC planning policies with every response to applications, regardless of whether our response is “no comment”, a comment or an objection.

139. ***Design – Para 139 NPPF – “ Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design<sup>54</sup>, taking into account any local design guidance and supplementary planning documents such as design guides and codes”***

In the Local Plan policy “good design” refers to keeping “in character” and links to Appendices A and B which contain design guidelines for the different character areas. Whilst the approach to design aesthetics has fundamentally changed in many ways, and continues to change, particularly with relation to extensions to listed buildings, the criteria in this policy are still relevant.

With regards to Point 5 (style of landscaping and boundary treatments), there have been a couple of incidents where this has not been completely successful (e.g. 82 Granville Road wall), but it has largely been effective.

#### Conclusion:

- The Policy and the guidelines set out in the Appendices are still relevant and do not require change.

#### Future Action:

Whilst not needed at this time, at some stage in the future, it may be appropriate to revisit and possibly extend the design guidelines.

## **LNP 4 - Limpsfield Village Conservation Area**

### Remarks:

- As a result of the Neighbourhood Plan the Parish Council funded a review of the Conservation Area of historic Limpsfield Village Conservation Area. This was last undertaken in 1972, so a review was long overdue. The review, entitled the 'Limpsfield Conservation Area and Management Plan' was led by Christopher Reynolds of the historic environment team at Surrey County Council and was formally published by TDC 2022. It can be found on the TDC website.
- Several minor alterations were agreed for the Conservation Area to reflect changes since 1972. The 'Schemes of preservation and Enhancement' form the management plan and have resource implications for the Parish Council, TDC and SCC. Progress has been made on many of these recommendations, but some are still under review, and others may not be achievable (see Implementation Projects section).
- Measuring Effectiveness of the Policy - The starting point in measuring the effectiveness of the LNP would be to review the planning applications that have been submitted for the Area during the period under review. In doing so, we would be looking for:
  - The applications approved where the LNP's criteria have not been met and the reason why these were approved.
  - The applications which, in their initial submissions, referred to the LNP and how many conflicted with the LNP.
  - Of these, how were the conflicts resolved, i.e. refused, appealed or amended to comply with LNP.
- Planning officer reports demonstrate that the officers are referencing the LVCAAMP and the Historic Buildings Officer, Chris Reynolds, is regularly consulted.
- While attempts to address parking and congestion issues, with some success, the Parish Council can only have a limited effect as traffic control is managed by SCC.

### Conclusion:

- The principles of this policy remain unchanged.

### Recommendations:

- LVCAAMP has been concluded and TDC has adopted the plan as an SPD. The paragraph regarding the Limpsfield Village Conservation Area Appraisal



and Management Plan (LVCAAMP) should be updated, due to completion and adoption of the Appraisal and Management Plan, which addresses the issues identified in the AECOM Character Assessments (and for which projects are now being or have already been implemented). This could be done by way of a footnote.

- Non-material change (TBC) – reference to “planning applications” to be updated by a footnote adding: “including TCAs and TPOs” [terms also to be added to Glossary].
- To update:
  - Approval of plans to redevelop Dorothy's Cottage (next to St Peter's Church Hall) and so removing one of the Area's main eyesores / Plans for K6 phone box – should this be updated – Dorothy's is being developed and K6 has been adopted?
- Addition of Footnote to point to Implementation: *\*Allied to these policies there are projects that have been or are in the process of being implemented.*
- Whether these are material or non-material changes will be confirmed by TDC.

#### Future actions:

- Continue to monitor all applications with relation to heritage statements, LVCAAMP and the influencing role with SCC.

## **LNP 5 - Landscape Character**

### Remarks:

- The key change in this policy is the references to AONB, now being proposed for extension and re-named Surrey Hills National Landscape.
- We have endorsed the expansion of the Surrey Hills National Landscape into Limpsfield and have actively participated in the review and consultation process.
- To include a footnote referencing the above. This will also note that there has been a review of the AGLV/AONB [change of terms - Glossary].
- While the initial statement that says “proposals...will be expected to enhance the quality of that landscape....” carries high expectation, it is a good statement of intent and gives the LPC a chance to respond to applications that may threaten Landscape Character/Quality.

### Conclusion:

- The principle of the policy remains unchanged with no material changes required.
- In terms of planning oversight, LPC has been vigilant and successful with regards to protecting the parish to date within this Policy.
- However, the Green Belt/“Grey Belt” definitions and housing need may put more of the landscape character under threat.

### Recommendations:

- To find out what are the consequences of the National Landscape Review for the remaining AGLV areas.
- To consult with TDC regarding the renaming of AONB and “Grey Belt”/Green Belt definitions/NPPF policy changes throughout the document (see conclusions on Policy LNP1) and include an additional footnote cross referring to the earlier footnotes
- To draft an overview paragraph that considers the changes – possibly at the beginning or the Review Document. To consult with TDC on this.

## **LNP 6 - Local Listings**

### Remarks:

- The Parish Council has proposed 17 additions to the *Buildings of Character* (aka Local Listings) in Limpsfield. The proposed amalgamated list is up to 31/32 properties.
- At publication date consultation on these additions has not yet been concluded by TDC. Existing (published) Local Listings are relevant as of 2013. But have not been updated since. We await the conclusion of Tandridge District Council.

### Recommendations:

- Non-material change – add a footnote indicating that the Parish Council has undertaken a review, which will be updated by Tandridge District Council.
- Non-material change – Local Heritage Assets – Capers Farm is listed twice in the list at 4 and 5 and a footnote indicating correction could be added.
- Non-material change – Footnote to reference National Trust has a list of heritage assets on Limpsfield Common.

### Conclusion:

There are no material changes to the principles of the Policy

### Achieved to date:

- Submission of 17 proposed heritage features to be added to the Local Heritage List Project. Awaiting conclusion as above.

### Future Actions:

- Review and add to this list whenever possible or relevant and to liaise with any organisations that that may be reviewing Veteran Trees and Hedgerows.

## **LNP 7 - Local Green Spaces (LGS)**

### Remarks:

- The Parish Council identified nine local green spaces, and no building has taken place on any of these areas, and none has been identified for possible building.
- The designation of these spaces has been a success and greatly appreciated by the community.
- As of May 2025, all LGS designations are still in place.

### Conclusion:

- No material changes required. Principles are still valid.

### Recommendations:

- Check and update any paragraph references with the NPPF update as a footnote – if appropriate.

### Future Actions:

- Focus on and decide how to respond to any changes to Local Green Spaces designations in relation to the NPPF reforms, if required.
- Continue to monitor any potential threat of development of these areas.

## **LNP 8 - Promoting Biodiversity**

### Remarks:

- The Parish Council has made good progress on biodiversity in terms of strategy and projects, particularly in relation to other parish and district councils.
- Early in 2024 the Parish Council hosted a biodiversity roundtable session with 15 participants. As a result, a Biodiversity Strategy was agreed for the parish and a presentation given at the annual meeting.
- The aim is to increase the biodiversity of gardens and public spaces, encourage wildlife corridors for the insects, and to link up with Surrey County Council, Tandridge District Council and other local parish councils as they develop their biodiversity approaches.

### Conclusion:

- No material changes to the policy principles.

### Recommendations:

- A non-material update of the wording by way of a footnote may be appropriate to reflect the requirement under planning legislation for Biodiversity Net Gain (BNG).
- Footnotes to recognise BNG and that we have moved on with biodiversity on a broader basis outside of planning, working in line with national and regional objectives.

### Future Actions:

- To keep in touch with SCC and TDC, and other key organisations as they develop their biodiversity strategies, so that the Parish Council's activities dovetail with other programmes.
- To consider and comment on BNG) in all relevant planning applications as part of general planning applications scrutiny.
- To obtain updates from TDC/SCC as this is developed.

## **LNP 9 - Employment and Business Across the Parish**

### Remarks:

- LPC has no influence over businesses closing. There is however some influence that may be had over what happens to the use of premises (building and surrounding land) in terms of planning and change of use, e.g. business to residential or retail to hospitality etc.
- Paragraph 1 of the policy, which applies to Limpsfield Village and Oxted town centre (Limpsfield Parish only) follows the assumption that any application for change of use from business to residential should be refused. This remains unchanged.
- Wickham's Stores and Courtyard is a very positive development of small business space within the village.
- Paragraph 2 relates to the whole parish and should ideally be clarified.

### Conclusion:

- Overall – the policy principles remain the same with no change necessary.

### Recommendations:

- Reference / footnote in the LNP to terms or plans that are outdated, e.g.: Regen Oxted has been shelved due to lack of funding.
- To request to update photos as many are out of date. Should include Wickham's Courtyard photos (non-material)
- Paragraph 2 [as above]: Could this be clarified in the main box as a non-material change? Otherwise as a footnote.

### Future Actions:

- Double check that commercial use Class definitions haven't changed.

## **LNP 10 - Rural Economy**

### Remarks:

- LPC is supportive of existing and new business on previously developed land. There may be threat of change of use to residential with NPPF Changes/Grey Belt etc. LPC will continue to uphold the importance of retaining “brownfield” sites for rural economy where proper planning permission has been sought and granted.

### Conclusion:

- No changes to the principles of the criteria.

### Recommendations:

- Emma - To note Coast to Capital SEP may now be outdated, but still exists – footnote?

## **LNP 11 - Community Services in Oxted Town Centre**

### Remarks:

None

### Conclusion:

- No material changes to this policy.

### Recommendations:

- To keep up to date with Tandridge District Council building and Health Centre building in relation to Local Government Reorganisation (LGR).
- To enquire as to whether Tandridge Council offices be included in this to allow for some influence over what may go into the building if TDC gives it up (Business Class D1).
- Double Check all business classes for Glossary are up to date.
- Footnote regarding organisations operating in the library building: East Surrey Clinical Commissioning Group; to check CAB and TVA are still running clinics / consultations there.

## **LNP 12 - Community Services in Limpsfield Village and Other Parts of The Parish**

### Remarks:

- None

### Conclusion:

- No material changes to the policy principles.

### Recommendations:

- Possible non-material changes: As per LNP4, could we reference / footnote issues / implementation projects the Parish Council will look to pursue, and where or where we cannot make any further improvements.

### Future actions:

- Include footnote indicating that ACVs Carpenters Arms, Memorial Stores and The Bull Inn have been registered. The Legion and St Peter's Church Hall are in progress. Potential to also include St Andrew's Hall.
- St Peter's Church Hall remains an important and valuable commit facility, and the Parish Council would continue to support and encourage further development and the use of the hall.



## **LNP 13 - Sustainable Transport, Access and Car Parking**

### Remarks:

- This is one of the hardest policies in terms of influence of LPC although we have made very good headway in terms of Parking Review outcomes to help with congestion and traffic flow and establishing what is and isn't possible via communications with Highways and other authorities.
- Highways technical issues are not within the Parish Council's area of expertise. We can, however, bring issues to attention of the relevant authority/authorities and push for results or an understanding of limitations.
- To get updated statement from Highways regarding high street parking and traffic issues/potential solutions that cannot be implemented and why.
- It should be noted that although all LNP 13 is still relevant, there may be overlap as to aspects that are projects (either attained, attainable) or form part of policy. E.g. LPC can have very little, if any impact on bus routes.

### Conclusion:

- Principle of policy stands.

### Recommendations:

- Can the definition of "Green Infrastructure" be included in a footnote?

### Future Actions:

- To try to establish an update from SCC and TDC on:
  - Real time bus info at bus stops feasibility (particularly for the Chart)
  - Electric Vehicle Charging Points – both on-street (Connected Kerb / SCC) and off street and car parks (TDC)
- Establish if more SpeedWatch groups are possible – LPC fully endorses this exercise, but securing volunteers is the main issue.
- Liaise with Oxted Parish Council and Tandridge District Council regarding the future opportunities for Ellice Road car parks (asset transfer) and how this will affect car parking in the wider area (Limpsfield and Oxted)
- Potential to collaborate with Oxted Parish Council regarding the above.

## **LNP 14 - Connecting the Parish**

### Remarks:

- It has become apparent while attempting to implement this policy, that the influence of the LPC in affecting the expansion of broadband network is limited and we cannot correct a “market failure”.
- There is limited ability by parish councils (or indeed district / borough councils) to influence the provision of broadband network other than ascertaining what provision residents already have and what is possible within the scope of the communications companies build plans and looking to build dialogue with the relevant comms and infrastructure companies to address shortfall / coverage gaps.
- The same goes for mobile phone signal in terms of influence over the network expansion (masts).

### Conclusion:

- The principle of this policy still stands in terms of supporting and wishing to facilitate the provision of super-fast broadband (or alternative) to as much of the parish as possible.

*See “Review of Implementation Projects” in terms of what we are doing and have done to try to assist in this area.*

