Dear Kevin,

Planning Application 2026/955: Land East of Rowlands, Westerham Road, Limpsfield, RH8 0ED.

Erection of 26 new market and affordable homes (class c3), together with associated vehicular, pedestrian and cycle access, parking, suds, landscaping and open space

Thank you for the opportunity to comment on the above application. We are aware that the District Council will shortly be publishing a new draft Local Plan for consultation under Regulation 19. The Parish Council's comments on the application have been prepared in advance of the formal publication of The Plan. However, we understand that, in the "final draft", as presented to the District Council for approval, the site has not been allocated for development and that it is to remain within the Green Belt. This accords with our own assessment as set out below.

In the event that the application has not been determined by the time the draft plan has been formally approved and taking into account the weight which will then be attached to the new draft plan, we will consider whether we wish to make further representations.

Spatial Strategy

The Limpsfield Neighbourhood Plan provides a clear and locally specific spatial strategy against which the proposed development can be assessed. Policy LNP1, the *Spatial Strategy for the Parish*, makes a clear distinction between the built-up area and the surrounding countryside, with land outside the built-up area boundary remaining open countryside within the Green Belt, where new development is strictly controlled.

The site of the proposed development lies outside the built-up area as defined in the Neighbourhood Plan and is within the Green Belt. Accordingly, the proposal for 26 new dwellings on the site conflicts directly with Policy LNP 1.

As considered in more detail in the next section of these representations, the A25, to the immediate north of the site, provides a clear boundary to the built-up area. The Heritage and Character Assessment which accompanies the Neighbourhood Plan recognises the presence of a number of houses on the south side of the A25. These are to the west of the application site and are generally well set back and largely concealed from the road. Appendix B summarises the character as 'very lightly developed and subject to Green Belt policies.' The general character of the area is as countryside rather than built-up area and the site itself, whilst vacant for a number of years, has a long history of agricultural use.

It is acknowledged that new uses for the allotments site need to be found, and this is referenced in the Heritage and Character Assessment. However, redevelopment for housing, as proposed, together with the associated roads, parking, lighting, domestic boundaries and other infrastructure, would create an urban environment

fundamentally in conflict with the Neighbourhood Plan's 'vision for Limpsfield' which seeks to protect 'valued open spaces and Green Belt', Policy LNP1, which defines the boundary of the built-up area, Policy LNP5 which seeks to protect sensitive landscapes within the Parish, and the design policy guidelines for Limpsfield South as set out in the Neighbourhood Plan's Appendix B.

Green Belt

The site is located in the Green Belt immediately to the south of the A25. At this point the A25 forms a strong boundary to the built-up area of Oxted, Limpsfield and Hurst Green. Whilst it is acknowledged that there are a number of residential properties on the south side of the A25, the area, as a whole, reads largely as countryside. This is a characteristic of the area which was recognised by Tandridge District Council in its initial assessment of proposed development sites during the preparation of the its new Local Plan.

We do not accept that the area can be defined as 'grey belt'**.**

Oxted, Limpsfield and Hurst Green is recognised as a 'large built-up area' for the purposes of Green Belt policy and, in this context, we consider the site contributes strongly to both purposes (a) and (d).

- **Purpose a:** to check the unrestricted sprawl of large built-up areas. As indicated above, the A25 acts as a strong boundary to the built-up area and the site reads as part of the countryside. Development of the site would act as a precedent for development of other land on the south side of the A25 leading directly to 'unrestricted sprawl' of the built-up area. We also note that, whilst the application is currently at appeal, the District Council has recently refused planning permission for residential development at Thornhill, to the west of the current application site (application 2025/1287). This further indicates the potential for development on the current application site to contribute to 'sprawl' on the south side of the A25.
- **Purpose d:** to preserve the setting and special character of historic towns. Oxted, Limpsfield and Hurst Green is recognised as an historic town. It is understood that this was identified in the preparation of the evidence base for the emerging Local Plan and it formed part of the District Council's evidence in an appeal relating to development on land south of Barrow Green Road in Oxted. In this context, Limpsfield, and particularly Limpsfield Village, plays an important role. As indicated in the 'Limpsfield Village Conservation Area Appraisal and Management Plan', the history of the village stretches back to the Domeseday Book, with the majority of the core village houses being from the 17th and 18th centuries and beyond. However, notwithstanding its individual characteristics and its definition as a Conservation Area, it is not and cannot be considered as separate from the wider area of Oxted, Hurst Green and Limpsfield. Rather, it is an integral part of the history of this wider area, with the developments of the late 19th and the 20th centuries drawing

the settlement together as one large urban area. In this context, the site of the proposed development performs a fundamental role in preserving the setting of the town. Wolf's Row is the one part of the Conservation Area to extend south of the A25, and its inclusion within the Conservation Area reflects, in part, the character of the area as development along the edge of the common. Whilst the former allotments site is not part of Limpsfield Common, its development would detract directly from this character, absorbing the cottages and houses of Wolf's Row (several of which are either Grade II Listed or are considered worthy of local listing) into the wider urban area.

If it is concluded that the site is not grey belt, then an additional clause from the NPPF on green belt comes into effect - **Purpose c**: 'to assist in safeguarding the countryside from encroachment'. As indicated above and notwithstanding the dispersed residential properties, we consider that the area to the South of the A25 within which the site sits continues to have the character of countryside and the development would encroach into this countryside conflicting directly with Purpose c.

Limpsfield Village Conservation Area

National and local policies seek to conserve and enhance our historic environment. Policy LNP4 of the Local Neighbourhood Plan indicates the importance which is attached to retaining the distinctive character and unique historic context of the Limpsfield Village Conservation Area and this is given extra weight by the NPPF which, in Policy HE5, indicates that the effects of a proposed development on the setting of heritage assets is a material planning consideration .

Whilst the proposed development is outside the Conservation Area, it is our view that it would cause substantial harm to the Conservation Area's setting, a setting which is an integral part of the Area's historical significance. The character of the southern portion of the Conservation Area. would be fundamentally changed and diminished. As indicated in our comments on the Green Belt, this southern part of the Conservation Area currently retains its historic setting on the edge of common land, with open, agricultural land to its fore, a setting which is enhanced by the elevated position of the houses in Wolf's Row and the open views into and out of the Conservation Area. If the proposed development were to take place, it would become absorbed into an expanded built-up area of which the proposed development would be the signal cause.

Through its heritage and character assessment, the Limpsfield Neighbourhood Plan recognises that alternative uses for the disused allotment site may be sought. However, a residential development as currently proposed would fail to respect the character or setting of the Conservation Area. The outlook from and setting of the area would change fundamentally to the substantial detriment of the Conservation Area and of those living there.

Housing Land Supply

We acknowledge the need to identify land for new housing within Tandridge District. However, we are of the view that land for new housing should be identified through Tandridge District Council's Local Plan process. This will enable the most suitable sites to be identified and strategies put in place which ensure that the impact of new development on the area is properly managed. As mentioned, a new draft Local Plan is shortly to be published and this will provide the opportunity for a range of different sites to be properly examined and development focused in ways which provide new opportunities and maximise benefit to the local community.

Housing Mix

The Limpsfield Neighbourhood Plan (Policy LNP2) seeks, amongst other things, to secure a mix of housing sizes and states that, in developments of four or more dwellings, at least 50% of the dwellings should have three bedrooms or less. The proposed development meets this criterion, but, in order to ensure that an appropriate mix is retained and in accordance with the Neighbourhood Plan, any permission should be accompanied by conditions requiring the prior consent of the local planning authority for extensions and alterations which provide additional accommodation at first floor level or above.

Local Services

The Parish Council is aware of the pressures that exist on local services, and Policies LNP11 and LNP12 in the Limpsfield Neighbourhood Plan support proposals which would improve or extend those services. We anticipate that, alongside the new District Local Plan, there will be a review of the local services available to people living and working in the area and of the contribution that new development should make to their improvement and extension. We consider that, as the new District Local Plan moves into its next stage of preparation, this should be taken into account in the consideration of any new residential developments proposed within the area.

Sustainable Transport, Highway Access and Pedestrian Safety

The Parish Council notes that, with respect to the availability of shops, health facilities and other local services, the site is beyond the walking distance which would normally be considered acceptable as the basis for a sustainable development. Moreover, the primary route is along a main road, the A25, which would be unattractive to many pedestrians. Whilst there is a half hourly bus service, this is unlikely to provide a suitable alternative for many trips and the car is likely to become the preferred mode of transport.

We are also concerned about the adequacy and safety of the proposed access arrangements and the implications of the development for pedestrians, cyclists and other road users along Westerham Road (the A25). Policy LNP13, *Sustainable*

Transport, Access and Car Parking, is also relevant to the provision of appropriate access arrangements, parking and opportunities for sustainable travel.

The proposed development would generate additional vehicle movements on the A25, including movements associated with residents, visitors and deliveries. The acceptability of these additional movements must be assessed in conjunction with the safety and suitability of the proposed site access, the visibility available to drivers and the arrangements for pedestrians and cyclists.

The Parish Council is particularly concerned that the proposed access and pedestrian crossing arrangements should provide safe, convenient and accessible routes for all users. This includes children, older people and those with mobility impairments, as well as pedestrians and cyclists travelling along or across Westerham Road.

The Parish Council would ask the District Council to ensure that the Highway Authority is satisfied that the access arrangements would be safe and that the development would not give rise to unacceptable highway safety impacts. The provision of a crossing or other highway infrastructure should not be regarded as sufficient in itself without evidence that the arrangements are safe, practical and suitable for the location.

Conclusion

With these factors in mind, the Parish Council formally **objects** to the proposed development and requests that planning permission be refused.

In the event that planning permission is granted, either by the District Council or on appeal, we would ask that, along with other conditions, two particular conditions are imposed – a condition ensuring that a strong line of landscaping is provided and retained along the Wolf's Row boundary of the development, in order to limit the impact of the development on the Conservation Area and properties in Wolf's Row, and a condition controlling future extensions and alterations to the new dwellings, in line with Policy LNP2 of the Neighbourhood Plan.

Yours sincerely,