

**Officer Comments on the Tatsfield Neighbourhood Plan  
(Our Vision for Our Parish : 2017-2033)  
Version of April 2023**

**Tandridge District Council (TDC)  
01.8.23**

### **Purpose of the Document**

This document provides comments of Tandridge District Council (TDC) on the Regulation 15 Submission Tatsfield Neighbourhood Plan (Our Vision for Our Parish: 2017-2033). Version of April 2023 ('the Plan').

An earlier version of the Plan was considered at Planning Committee. It was agreed that it will be placed out to Regulation 16 Consultation in line with the Neighbourhood Planning Regulations. A few issues, however, remained outstanding.

### **Outstanding issues**

Consideration of these outstanding issues has been complicated by the Local Plan/Neighbourhood Plan staff all changing. There is uncertainty as to what was agreed and what still needed consideration. It is understood by the new consultant officers at TDC that the outstanding issues raised by previous Council officers include but are not limited to:

- Possible limited reach of the Regulation 14 Consultation.
- SEA and HRA document referring to basic conditions at 2.4 and 2.5 (The officer stated these may need deletion).
- Local Green Spaces – Responses were received after the submission of the NP and so comments have not been fed into the Plan.

These issues are therefore given particular attention within this report.


A decision was made by the new consultant officers that the best approach is to provide written officer comments on the Plan. TDC acknowledges that the Parish Council has previously made changes suggested by TDC but hopes these further comments will be considered helpful.



TDC acknowledges that the Parish Council would like to proceed quickly with the Plan, but on reading the Plan has identified that some areas of the Plan and supporting documentation would benefit from additional work. Addressing these issues at this stage will be mutually beneficial. It will hopefully reduce the number of comments that TDC needs to raise at Regulation 16, and the Parish Council will be able to handle the changes to the Plan rather than pass this to the TDC who will oversee Proposed Modifications after the Neighbourhood Plan Examination.

### **Regulation 16 Consultation**

TDC's work on the compilation of documents needed for the Regulation 16 Consultation has started. This includes documents for the websites, questions for those responding etc. The consultation is, however, unlikely to be able to proceed until the end of the Summer due to resource constraints and the need for the new policy team to undergo training for the consultation software (Objective). The Objective consultation database also needs to be updated and refined. There have been some issues with recent consultations using this database which need consideration before the consultation is run. Further summer holidays are not considered the best time for consultations.

## Comments on the Tatsfield Neighbourhood Plan



Section	Comment
Overall	The plan is well thought out and well written. It provides a sense of place and a sense of local distinctiveness. The imagery is great at emphasising this. The history is interesting.
Layout	The page layout is good and easy to use. The positioning of the policies is unusual, and an Inspector may not agree with this approach. Usually, the supporting text is adjacent to the policies to which it relates.
Maps	Maps do not always give sufficient clarity.  Many of the maps would be hard to interpret at planning application level. Has the option of a better map base been explored?
Overlap of policies	Overlap and repetition both within the document, with Local Plan Policies and with national policies. The Inspector may recommend some changes here.  It might be useful to have a look at the overlapping areas internally and with the rest of the development plan and see if any simple changes can be made.
Chapters read as separate entities.	The chapters come across as individual chapters and the cohesion is slightly lacking.  
Hyperlinks	Hyperlinks are not acting as hyperlinks.
Basic conditions	The Plan only includes four of the basic conditions. Ensure you list all conditions that apply.  List in Plan: <ul style="list-style-type: none"> <li>• have regard to national policies and advice contained in guidance issued by the Secretary of State.</li> <li>• contribute to the achievement of sustainable development</li> <li>• in general conform with the strategic policies contained in the development plan for the area</li> <li>• be compatible with European Union obligations, as incorporated into UK law.</li> </ul> List in the legislation: <a href="https://www.legislation.gov.uk/ukpga/1990/8/schedule/4B">https://www.legislation.gov.uk/ukpga/1990/8/schedule/4B</a>  (a)having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order,

Section	Comment
	<p>(b)having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order,</p> <p>(c)having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order,</p> <p>(d)the making of the order contributes to the achievement of sustainable development,</p> <p>(e)the making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area),</p> <p>(f)the making of the order does not breach, and is otherwise compatible with, [F2retained EU obligations], and</p> <p>(g)prescribed conditions are met in relation to the order and prescribed matters have been complied with in connection with the proposal for the order.</p>
<p>Evidence</p> 	<p>Throughout the plan and the supporting documents there is a lack of evidence.</p> <p>It would be very useful if the PC could better show how decisions were made etc. What information was used?</p> <p><u>This is one of the main issues that needs extra work.</u></p>
<p>Broad changes should be documented.</p> 	<p>How did the SEA change the plan?</p> <p>How did consultations responses change the plan?</p> <p>What changes have been made to the plan and why?</p> <p><u>Again, this is one of the main issues that still needs addressing.</u></p>
<p>Preparation of the Tatsfield Neighbourhood Plan</p>	<p>Text Clarity - Amend to read ‘and its officers THEN held meetings with the Neighbourhood Plan Steering Group.’ It wasn’t all on the specified date.</p>
<p>Our Vision</p>	<p>Amend this part so it is clearer:</p> <p>‘the parish’s functioning village centre will have been strengthened and valued’</p> <p>What exactly did you mean by this? Explain this more comprehensively.</p> <p>This part of the Planning Practice Guidance is useful:</p>

Section	Comment
	<p><b>How should the policies in a neighbourhood plan be drafted?</b></p> <p><i>A policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared.</i></p> <p>Paragraph: 041 Reference ID: 41-041-20140306</p> <p>Revision date: 06 03 2014</p>
Update re Local Plan examination	<p>This should be updated. (Plan is still at examination). Could direct to TDC website for latest position. At present you can just substitute 2023 for 2022.</p> <p>As at <b>25<sup>th</sup> July 2023</b>, the Tandridge Local Plan remains delayed and it is uncertain whether it will proceed to adoption following feedback received from the Planning Inspector at examination.'</p>
01.3	<p>The Parish Council is advised to use hectares as well as or instead of acres throughout.</p>
02.1 Objectives	<p>Reference to objectives has wrong pages. The Parish Council is advised to use section numbers to avoid these issues. It should also check other references for accuracy.</p>
Page 25	<p>Maps on page 25 are hard to interpret.</p>
Page 33	<p>Map of Green Spaces hard to interpret. The Parish Council could add a key. Perhaps saying why green boundaries differ from non-red boundaries would add clarity?</p>
Green Spaces	<p>This section of the Plan needs further work.</p> <p>This work should address the requirements of The National Planning Policy Framework (NPPF) on Green Spaces.</p> <p><i>'101 The designation of land as Local Green Space through local and neighbourhood plans allows communities to identify and protect green areas of particular importance to them. Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or updated, and be capable of enduring beyond the end of the plan period.</i></p> <p><b>102. The Local Green Space designation should only be used where the green space is:</b></p> <p><b>a) in reasonably close proximity to the community it serves;</b></p>

Section	Comment
	<p><i>b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and</i></p> <p><i>c) local in character and is not an extensive tract of land.</i></p> <p><i>103. Policies for managing development within a Local Green Space should be consistent with those for Green Belts.'</i></p> <p>To allocate green spaces the Parish Council needs to justify the designation of the green spaces using the criteria above. The Parish Council need to show land has been assessed using these criteria.</p> <p>The Planning Practice Guidance provides copious guidance on Green Spaces. The Open Spaces society gives some simple guidance and Locality has great guidance.</p>
Page 38 Photo	The 'view up the Kemsley Road' photo is rather unconvincing – looks like a field more than a view.
TNP02B	Amend plan to read 'development plan'. It will be considered against all development plan policies.
TNP02C	Ideally all the areas would be named and mapped.
TNP02E	The places named in the policy are not clearly outlined on the map. Add the MUGA?
TNP02F	<p>Policy unclear. Consider amending:</p> <p>a) No development will be permitted that detracts from the contribution made to Westmore Green and Tatsfield Green by the open space between the surrounding houses.</p> <p>to</p> <p>a) Development, in the vicinity of Westmore Green and Tatsfield Green, that respects the contribution made by the open spaces between the houses, will be supported where it....</p> <p>(Positively wording policies is considered optimal)</p> <p>Consider a plan.</p> <p>This needs further work to make the aims of the policy clearer.</p>
TNP02G	<p>Some landscaping schemes might be required by planning condition. The Parish Council is advised to consider if the policy be amended to include this.</p> <p>The Parish Council is advised to consider exactly when it wants this policy to apply.</p>

Section	Comment
	<p>How does this overlap with what's in the Local Plan?</p> <p>There is new biodiversity guidance published... its listed at <a href="https://www.gov.uk/government/collections/biodiversity-net-gain#:~:text=Biodiversity%20net%20gain%20(%20BNG%20)%20is,than%20it%20was%20before%20development">https://www.gov.uk/government/collections/biodiversity-net-gain#:~:text=Biodiversity%20net%20gain%20(%20BNG%20)%20is,than%20it%20was%20before%20development</a>. This could 'overtake' what you propose. Maybe add a phrase like 'Where proposals meet current national requirements for biodiversity net gain, they should incorporate measures such as...</p>
TNPO2K	<p>This document has been revised so this reference is now out of date. The Parish Council is advised to guard against this by adding a phrase like 'or subsequent versions' or say the latest guidance from... The latest version is provided here: <a href="https://theilp.org.uk/publication/guidance-note-1-for-the-reduction-of-obtrusive-light-2021/">https://theilp.org.uk/publication/guidance-note-1-for-the-reduction-of-obtrusive-light-2021/</a></p>
TNPO3A and B	<p>Why two to three not one bed? Does any evidence support this? A consultation response said bungalows and you could add this too or refer to it? Provide evidence for your decisions as to what to include in the plan.</p>
TNPO3A and B	<p>Tightening wording would be good. The Parish Council is advised to consider exactly what it wants to see in the village.</p> <p>How does this overlap with other development plan policies? If it's too onerous and would reduce provision coming forward it may not get supported. See the National Planning Policy Framework on this.</p> <p>The Planning Practice Guidance is also useful:</p> <p><i>Neighbourhood plans may also contain policies on the contributions expected from development, but these and any other requirements placed on development should accord with relevant strategic policies and not undermine the deliverability of the neighbourhood plan, local plan or spatial development strategy. Further <a href="#">guidance on viability</a> is available.</i></p> <p>Paragraph: 005 Reference ID: 41-005-20190509</p> <p>Revision date: 09 05 2019 See <a href="#">previous version</a></p> <p>The Parish Council could be more specific as to what's important.</p> <p>Prioritisation is important too.</p> <p>Use 'impact' not 'effect' in last part.</p>
Design policies	<p>Design policies seem to overlap with existing policies in Local Plan and in parts within policies in the plan (e.g. parking, hedges). Are some therefore not needed?</p>

Section	Comment
Development on land that floods.	Check policies do not overlap with other areas of legislation.
TNP05C	Avoid addressing issues in different places in the plan. It looks like SuDS should be dealt with here but they are addressed later on. Avoiding revisiting subjects could help.
TNP07A	The word Aileen is on the wrong line.  Could add school MUGA here?
TNP07B	Development plan not neighbourhood plan.
TNP08C	The Parish Council could consider adding cycle parking.
Date of next plan 	It may be useful if the plan is reviewed more quickly than this. The Parish Council is advised to consider how long it will last and consider leaving this more open/consider reviewing it after 3 years? The Parish Council is advised to think about setting up a way to monitor the plan and whether it wants to make a way to record any changes that could be looked at in the future. Could be done by Parish Council when considering any planning applications? Consider keeping a copy of the plan available and adding handwritten annotations in this when issues are identified. Another way is to set up an email address that people can send emails to when they have comments. This means they are available when reviewing the plan.
Monitoring 	Add monitoring?
HRA/SEA Report	Delete reference to basic conditions in this – it is unclear why this section is included. Looks like an error?
Consultation Statement	<p>The Consultation Statement should be improved. It would be easier if the Inspector is able to ascertain the following:</p> <ul style="list-style-type: none"> <li>• Who was consulted. Did it go to all those required?</li> <li>• How were people consulted?</li> <li>• Were they given a letter giving them six weeks to reply in Regulation 14?</li> <li>• Could this letter be included?</li> <li>• There seems to be some confusion in the Consultation Statement that Regulation 14 was a two-day event. Clarify this.</li> <li>• Does the Parish Magazine go to everyone?</li> <li>• How were businesses consulted?</li> </ul> <p>It is clear from the TDC files that there are useful documents that are not in the consultation statement but would improve it. It would be great if the consultation Statement could reassure the Inspector that the consultation has been appropriate.</p>



<b>Section</b>	<b>Comment</b>
	<p>The Statement should also demonstrate how suggestions have been incorporated within the plan.</p> <p>Do consider including the responses or providing more detail of what they said. At present its not convincing. The documents provided to TDC are far more convincing and the Parish Council should consider adding these to the document.</p>