

Star Fields Action Group: proof of evidence to Appeal reference 3319149 Land at the Old Cottage, Station Road, Lingfield RH7 6PG.

“If we are to deliver the new homes this country needs, new development must have the support of local communities.” Michael Gove, December 2022.

1. The proposal to develop Star Fields (Land at the Old Cottage) in Lingfield lacks support in the local community. It is opposed virtually unanimously by people in Lingfield, by the parish council, in the draft Lingfield Neighbourhood Plan, by our successive district councillors, by our county councillor and has been refused by Tandridge District Council. If Mr Gove’s statement has any value, this appeal should also be refused.

Star Fields Action Group

2. The Star Fields Action Group is an informal group of local people who came together in 2018 to draw attention to the threat posed to Lingfield by the allocation of Star Fields in the TDC Draft Local Plan. It has 150 members and a website at www.starfields.info. STAG originated in packed church meetings following the allocation of the site in 2018: see recording of church meeting <https://www.youtube.com/watch?v=YFq3y7Nt0rY>

3. Successive district councillors - Liz Lockwood, Mark Ridge and Katie Montgomery - have been members of STAG, with Katie Montgomery being the current incumbent.

4. STAG has encouraged people to register their views with Tandridge District Council, the Planning Inspector considering the Tandridge Local Plan 2033 and the Inspector hearing the current appeal. They have done so in substantial numbers. This evidence is submitted on behalf of the Star Fields Action Group.

Star Fields, Lingfield

5. Lingfield is a large village that has managed to maintain a semi-rural character, despite its increasing population over the years. It has done this because the village has significant open spaces that extend into the heart of the settlement. They maintain a contact with rural areas and ensure that people living in any part of Lingfield are close to green fields and rural surroundings.

6. Star Fields lies close to the centre of the village - just a few hundred yards from the High Street. At its western end it adjoins the medieval Old Town, one of the original main settlement areas. The Woolbro proposal would make the transformation of Lingfield into a fully urban settlement inevitable.

7. Star Fields is wholly located in the Green Belt and more than half of the site lies within the Lingfield Conservation Area. It provides the setting for very many people’s daily journeys to and from Lingfield railway station through fields with views of ancient buildings. Were Woolbro’s proposal to build in the

middle of a Conservation Area to be permitted, these bucolic journeys would take place through a housing estate.

8. For decades residents in the Conservation Area have been constrained by - and complied with - many planning restraints and requirements. These apply to extensions, materials, walls and even pruning trees. The result of these years of conservation is that the area and, in particular, the highly visible Oast House complex, remains an important amenity asset. Removing Conservation Area status would be likely to result in changes, in particular to the Oast House complex, that would devalue this important heritage asset.

9. The small number of properties that border the site are a mixture of medieval, Victorian and Edwardian buildings. The houses that Woolbro propose would be utterly incompatible with the surrounding buildings.

Views of people in Lingfield

10. Against that background, it is unsurprising that people in Lingfield have strongly opposed this site allocation at every opportunity. As recently as 19 June 2023, at a meeting at the Community Centre attended by very large numbers of people to discuss the Neighbourhood Plan, there was again unanimous opposition to any development on Star Fields.

11. Returning to the 2016 consultation, TDC ruled that Star Fields (then called LIN 030) was "unavailable and undeliverable" and accordingly ruled it out of play. Between 2016 and 2018 there were discussions between Woolbro and TDC (the documents are available as part of the appellant's submission) that resulted in inclusion of the site in the Draft Local Plan 2018. At no point in this period did TDC indicate to Lingfield that it was considering such a major change; nor did it give them any opportunity to comment. Clearly, where a major change of approach was envisaged by the consulting body, there should have been further discussion with those affected. An exceptionally large number of objections were made to the Star Fields site in 2018.

12. TDC claimed that this change was not of sufficient magnitude to justify further consultation. Viewed from their offices in Oxted, it might have seemed a small change: for the residents of Lingfield, it was the single most significant change that affected them. Had TDC consulted properly, in line with normal standards for public consultations, Star Fields would not have been included in the draft Tandridge Local Plan 2033.

Neighbourhood Plan – not a NIMBY community

13. The Lingfield Neighbourhood Plan has been under development since 2014 and has, at several stages, consulted people about potential locations for development (and about the type of development that might be suitable).

14. The Neighbourhood Planning team have made it clear that it is essential to identify sites that can provide sufficient housing, of the right type, to meet future needs. Most of those sites will inevitably involve incursion into the Green Belt. In repeated consultations these conclusions have been supported locally both in terms of the sites identified as suitable for development and in the rejection of Star Fields.

15. People in Lingfield have demonstrated, through their responses to the Neighbourhood Plan, that they are not opposed to development in the village. They have been willing to accept the need for it and have responded to the call to identify the sites that they prefer for development. The sites identified in the Neighbourhood Plan would ensure that Lingfield was comfortably able to ensure a supply of homes over the next 5-10 years.

Public consultation

16. It is notable that Woolbro Homes have not held any face-to-face consultation with people in Lingfield - they are no doubt well aware of the response they would receive. One attempt to engage with people in Lingfield was via a leaflet that transparently invited approving comments. It did not, for example, ask people's views on the huge loss of amenity that would be occasioned, were their plans to succeed. Here, again, the views of people in Lingfield have been completely disregarded.

17. Against the background of wholesale rejection of Woolbro's proposals in Lingfield it is worth looking at what the Government has said about local input to planning decisions. On 5 December, 2022, Michael Gove, Secretary of State for Levelling Up, Housing and Communities, issued a press release in which he said:

"The measures strengthen the government's commitment to building enough of the right homes in the right places with the right infrastructure, ensuring the environment is protected and giving local people a greater say on where and where not to place new development."

18. He also said:

"If we are to deliver the new homes this country needs, new development must have the support of local communities. That requires people to know it will be beautiful, accompanied by the right infrastructure, approved democratically, that it will enhance the environment and create proper neighbourhoods."

19. It is entirely clear that the proposal to build on Star Fields does not have the support of the local community. It does not reflect the view of people in Lingfield about where and where not to place new development. It is not approved democratically and nor would it do anything to enhance the environment in Lingfield. It makes no provision for the additional infrastructure that would be required – notably the increased burden on the surgery. It is hard to think of any development that could be more at odds with the sentiments expressed by Mr Gove – the minister responsible for housing and for policy on where housing is built.

20. If the sentiments expressed so recently by Michael Gove have any value, it is impossible to see how developments such as Star Fields could be permitted.

National Planning Policy Framework

21. The Inspector will be fully familiar with the guidance in the National Planning Policy Framework relating to developments that affect heritage assets. In the case of Star Fields, substantial concern has been raised by the public and by heritage experts about the impact on the many valuable heritage assets that surround the site.

Infill

22. The argument has been made that development of the Star Fields site constituted "infill" because it was contained by built form (ROK landscape statement 2019). This is inaccurate – as their own map shows, page 26 – there are small broken areas of built form of around 17 houses and one public house – The Star - but the area is essentially open.

Planning Inspector and TDC Local Plan 2033

23. An Inspector's examination of the TDC Local Plan has been continuing since 2019. The Inspector has repeatedly informed TDC that he finds the Plan as currently drafted unsound and in the latest

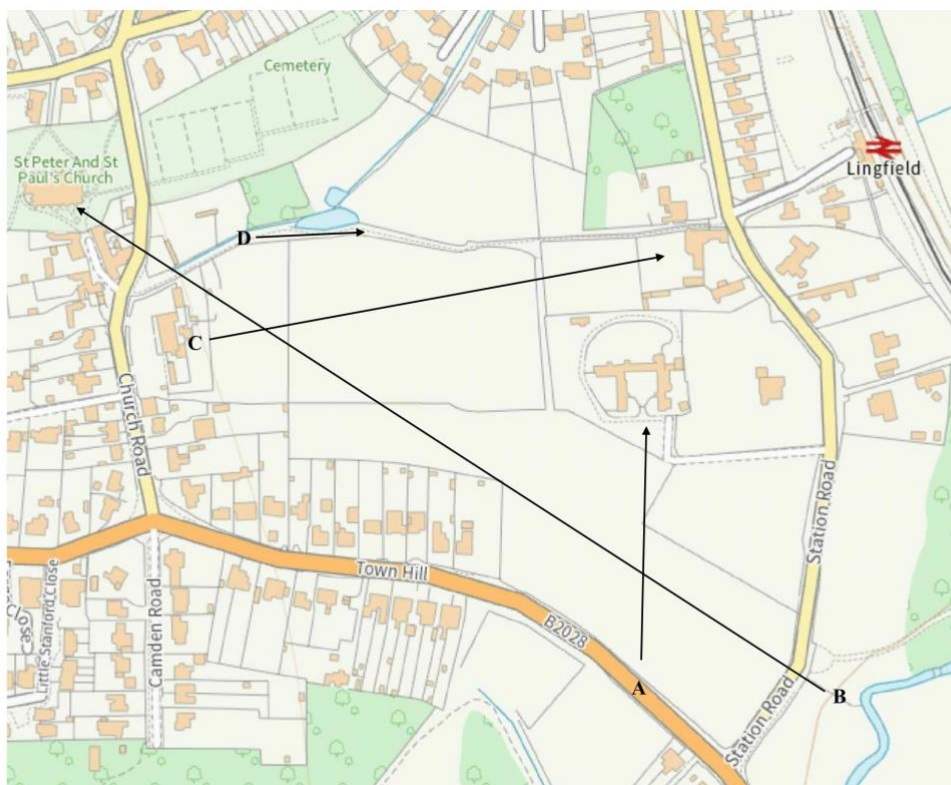
correspondence (June 23) indicates he is likely to conclude that it should not be adopted. One element in his conclusion that the Plan is unsound relates to Star Fields. In his letter of 11 December 2020 he asks for an assessment of the likely damage to heritage assets caused by the proposed development containing 99 houses. So far as we are aware, the Inspector's concerns about Star Fields have not been resolved.

Mitigation

24. In their statement of case, the Appellants do not acknowledge either the strength or volume of objection to their proposals. They simply assert that "any impact can be mitigated". This statement is manifestly untrue. The damage from the loss of Star Fields is not capable of being mitigated in any way that would be meaningful to people in Lingfield. There would be an absolute and permanent loss of amenity to the public. Views of the Grade I church and Grade II* New Place would be lost. The complex of locally listed buildings including a rare Surrey Oast House which can be clearly seen across fields would be lost.

25. The footpath would run through a housing estate instead of fields. Instead of a pleasant (if needing repair) tree lined footpath, there would be an antiseptic modern replacement, complete with lighting and light pollution. It would have a public road running across it – the complete destruction of the current simple pathway that people enjoy.

26. The map and photographs below show clearly what would be lost forever, were the Appellants to succeed.



27. Photograph A below shows the view from Town Hill across to the Oast House complex. This view is currently available to anyone travelling up Town Hill. The Appellants in their application describe the position after development as "framing" a view of the Oast House. What this means is that a narrow window would exist between houses, through which a limited view of the Oast House would be obtained. In practice, the view would be entirely lost to most people.



28. Photograph B below shows the view from the footpath across open fields towards the church from the land used by the racecourse for parking. This footpath is used daily by hundreds of people, including commuters and leisure walkers. At present, the view is open across the fields and affords a pleasant appreciation of the Star Fields setting. Were development to take place, the dominant feature in the view would be of a housing estate.



29. Photograph C shows the view from the rear of The Star public house towards New Place. This view is enjoyed by many hundreds of people visiting The Star and sitting outside it. It is a beautiful view of fields and New Place. It would be destroyed altogether by the proposed development.



30. Photograph D shows the view along the old footpath running from the Old Town towards New Place and the railway station. This footpath is used by hundreds of people daily who enjoy the views to either side of them as they pass through open fields. Whilst the footpath is undoubtedly in need of repair, its replacement with a urban pathway bordered by housing would destroy its rural character.



Balance and Very Special Circumstances

31. The Inspector is asked to look at the balance between the admitted damage caused by building on the Green Belt, damage to the Conservation Area and the surrounding heritage sites and the supply of housing. The damage is, for people in Lingfield, substantial, permanent and incapable of mitigation. It is to be set against the provision of housing in alternative sites in Lingfield that would do far less damage to the village.

It is our contention that Star Fields and the Old Town is the key historic area of Lingfield. It has not been affected by substantial development and has, as a result, retained its rural feel and original character. That is attributable to the protection afforded, to date, by its status as a Conservation Area.

32. No doubt case law exists to justify any proposed destruction of Green Belt and Conservation Area land. Developing Star Fields would do immense damage to the Green Belt in Lingfield and to its Conservation Area. It would ignore the fact that alternative sites exist in Lingfield, at least one in an advanced stage of planning. These sites would supply at least as much housing as the Star Fields site. The Lingfield Neighbourhood Plan has carefully considered the balance of required development in Lingfield and the availability of sites. It has concluded that Star Fields does not need to be developed to meet housing needs and that the damage to the Green Belt and Conservation Area is not justified.

Conservation and Heritage

33. Star Fields links the 17th C Grade II* listed New Place with Lingfield Old Town. There are 11 listed buildings, both Grade I and Grade II* in an area that needs to be considered as a whole. Star Fields is not simply an agricultural field but the setting for a cluster of heritage assets of great cultural significance. The fact that there are uninterrupted views across the site makes it a unique setting and an essential part of the Lingfield Conservation Area.

34. A justification given at an earlier stage by Tandridge for removing Star Fields from the Green Belt was that it is physically and visually well contained on three sides by built form. This is demonstrably untrue. Star Fields is bordered by a mixture of mature gardens, the lower church graveyard, hedges and mature trees, agricultural land not in the site, a small orchard and the listed Grade II* wall to the garden of New Place. The only continuous development is on the west side which abuts Church Road.

35. Insufficient weight has been given in the Heritage Appraisal by Bidwells to the importance of the Heritage Assets. The Sustainability Appraisal for Lingfield shows that development sites have previously been rejected on grounds including "proximity to the Conservation Area and may affect setting of listed buildings". It understates the potential impact of Star Fields by simply describing it as having "west half within a Conservation Area and a Grade II* listed building sits to the east." The close proximity of the two Grade I listed buildings and the many other listed heritage assets are not mentioned at all. This represents a deliberate downplaying by Woolbro of the importance of the site overall as a setting for substantial heritage assets.

36. No consideration has been given to the connection between the New Place and Old Cottage sites and the Grade I listed church, all of which were within the Manor of Billeshurst boundaries from the late 12th century. Manning and Bray in their "History of Surrey" state that the capitol house of the manor was situated where The Old Cottage now stands. The Manor of Billeshurst was acquired by Sir Reginald de Cobham towards the end of the 13th Century and he is buried within the church. His grandson, the 2nd Baron Starborough, rebuilt the chancel and tower of the church and his great grandson, the 3rd Baron Starborough, rebuilt the remainder of the church and the college of secular priests. Their magnificent altar tombs can be found in prominent positions within the church. The rebuilding of the church and building of the college led directly to the adjacent area becoming the commercial centre of Lingfield and remaining so well into the 20th Century. The listed garden wall at New Place was built from stones removed from the college (demolished in the 17th century), as was the listed garden wall of the current building on the site of the college. The proposed development would, by its presence, destroy this ancient connection.

37. Overall, the assessment does not give sufficient recognition and weight to the heritage assets that surround Star Fields. The NPPF sets out the criteria for assessing the impact of a proposed development on sites such as Star Fields. It is clear that development of this site would only damage the heritage sites and their settings. It would do nothing to enhance the heritage assets. No doubt, were planning consent

to be given, we could expect radical changes to increase the housing density (one version of the plans for the site envisaged 150 properties), further damaging the site. The proposal needs to be assessed against the availability of alternative sites in Lingfield that would not damage any significant heritage assets.

Previous planning applications

38. There have been previous attempts to secure consent to build on Star Fields. In refusing the appeal in 1975, the Inspector included amongst his reasons:

3. The proposed development would result in the undesirable urbanisation of this pleasant area to the detriment of its character...

4. The proposed development would be entirely out of character with and conflict with the policy for the Designated Conservation Area of Lingfield (The Church) within which the application site lies.

Nothing has changed since the 1975 inspector reached his conclusions to justify the destruction of the Lingfield Conservation Area. He went on to quote (paragraph 51) from the 1966 refusal: "much of the appeal site, its footpath and the termination of the footpath at groups of distinguished buildings embodied the very spirit of the English village and countryside...."

39. The proposal to build on Star Fields is one that is opposed virtually unanimously in Lingfield. It would destroy a fine heritage site; it would end Lingfield's position as a semi-rural settlement; and it offers no housing benefits that cannot be supplied elsewhere in Lingfield. It was rejected in 1966 and again in 1975. The appeal should be rejected in 2023.

Star Fields Action Group
July 2023