

Land West of Station Road, Lingfield

Green Belt Assessment
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A Worton Rectory Park
Oxford
OX29 4SX
United Kingdom
T 01865 887 050

W www.lda-design.co.uk

LDA Design Consulting Ltd
Registered No. 09312403
17 Minster Precincts, Peterborough, PE1 1XX

Contents

1.0 Introduction.....	1
2.0 Local Planning Policy and Guidance	4
3.0 Assessment of Green Belt Purposes	3
4.0 Conclusions.....	11

Figures

Figure 1: Site Location and Green Belt

Figure 2: Proposed Development in Green Belt Context

Appendices

Appendix 1: Policy HSG12 from Emerging Tandridge Local Plan

Appendix 2: Tandridge District Green Belt Assessment Part 1 (2015) Appendix D Parcel Assessments Extract (Parcel GBA042)

Appendix 3: Tandridge Green Belt Assessment (Part 2) (2016) Appendix 2 Extract – (Parcel 045)

Appendix 4: Tandridge Green Belt Assessment (Part 3) (2018) Appendix 1 Extract – (Parcel LIN030)

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This document has been prepared and checked in accordance with ISO 9001:2015.

1.0 Introduction

This Green Belt Assessment report has been prepared by LDA Design on behalf of Wollbro Group and Morris Investments ('the Applicant') to accompany a planning application for residential development ('the Proposed Development') on approximately 6.2ha of land west of Station Road, Lingfield (the 'Site').

The Proposed Development comprises the redevelopment of the Site for residential use comprising up to 99 residential dwellings including access and areas of public open space.

The Site is situated within the Metropolitan Green Belt that encircles Greater London and is within the planning jurisdiction of Tandridge District Council (TDC). The adopted Local Plan records that approximately 94% of the district is designated Green Belt. The extent of the Site and its location is illustrated on **Figure 1: Site Location and Green Belt**.

The Site is currently undeveloped agricultural land and is allocated for residential development in the emerging Local Plan under Policy HSG12. Given the emerging Local Plan has not been adopted, development of the Site would be considered as 'inappropriate development' in policy terms, as it does not fall under specific exceptions as set out within the National Planning Policy Framework (NPPF) paragraphs 149 and 150.

Paragraph 147 of the NPPF requires that Very Special Circumstances (VSC) must therefore be demonstrated if development is to proceed.

This report considers the potential harm by the Proposed Development on the five purposes of Green Belt as defined in paragraph 138 of the NPPF. The fifth purpose – "*assisting in urban regeneration, by encouraging the recycling of derelict and other land*", is delivered by a combination of factors and policies beyond the scope of this assessment but a summary consideration is provided.

The potential harm to the purposes of the Green Belt identified in this report are then considered along with any other harm and the case for VSC within the Planning Statement submitted as part of the planning application.

1.1. The Purpose of Green Belt

Paragraph 137 of the NPPF states "*the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.*"

The five purposes of Green Belt as set out in paragraph 138 of the NPPF are:

- a) *to check unrestricted sprawl of large built-up areas;*
- b) *to prevent neighbouring towns merging into one another;*
- c) *to assist in safeguarding the countryside from encroachment;*
- d) *to preserve the setting and special character of historic towns; and*
- e) *to assist in urban regeneration, by encouraging the recycling of derelict and other urban land."*

Paragraph 147 of the NPPF confirms that *“inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.”*

Paragraph 148 advises *“local planning authorities should ensure substantial weight is given to any harm to the Green Belt. ‘Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations”.*

In relation to the improvement of the Green Belts, Paragraph 145 adds, *“Once Green Belts have been defined, local planning authorities should plan positively to enhance their beneficial use, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.”*

1.2. Harm to Green Belt, any other harm and very special circumstances (VSC)

The courts have established Green Belt is an *‘open textured policy’*¹. Therefore, in considering the harm to Green Belt and the balancing exercise for VSC, this Green Belt Assessment report should be read in conjunction with the following documentation submitted as part of the planning application:

- **Planning Statement** – which includes the consideration of the harm to Green Belt openness; presents the suggested VSC for the Proposed Development and the planning balancing exercise of the potential harm to the Green Belt and any other harm balanced with VSC.
- **Design and Access Statement (DAS)** – which details the design evolution of the Proposed Development with the aim of reducing harm and impact wherever possible.
- **Landscape and Visual Impact Assessment** – which includes a consideration of the visual impact of the Proposed Development including consideration of ‘landscape/visual openness’.
- **Landscape Strategy Plan** – which details the proposed landscape and ecology mitigation and enhancement measures.
- **Heritage Impact Assessment** - which assesses the impact of the Proposed Development on the historic assets and the potential harm and benefits to them.
- **Other technical documentation** - including the Ecological Report and Flood Risk Assessment and Drainage Strategy.

1.3. The Site and Proposed Development

The Site lies within the village of Lingfield in the southeast. It is bounded by the B2028 to the south, Station Road to the east and the residential dwellings of Lingfield to the north and west. Lingfield Station lies approximately 250m to the east.

The Site comprises approximately 6.2ha of agricultural grassland. The public footpath 381a runs east to west through the Site dissecting it into two distinct parcels – a small, enclosed parcel to the north; and a larger area comprising 3 fields with field boundary hedgerows in

¹ Turner v Secretary of State for Communities and Local Government [2015] EWHC 2728

the south. The Site also benefits from mature hedgerow vegetation on the southern and eastern boundaries. The Site is relatively flat with a gentle fall from southwest to southeast approximately 60m AOD to 50m AOD toward the Eden Brook.

The Proposed Development would entail the development of the Site for residential development, comprising up to 99 detached, semi-detached and apartment dwellings, access, parking and associated public open space and landscape. Forty percent of the dwellings would be affordable housing. Access would be from the B2028 Tower Hill with public open space provision in the north and southeast corner of the Site.

The extent of the Proposed Development is shown on **Figure 2: Proposed Development in Green Belt Context**.

1.3.1. Footprint and Volume

Case law has established that the footprint and volume of built form is a relevant consideration in assessing the potential harm to the Green Belt². To inform the assessment of potential harm to the four purposes of Green Belt the proposed built form footprint has been measured and is presented in **Table 1** below.

Table 1: Proposed Built Form Footprint and Volumes

	Total Area (ha)	Proposed Built Form Footprint (sq m)	% Area of Built Form
Site	6.2	4.2ha	69%

In terms of overall proposed built form, the Proposed Development would result in approximately 2/3rds of the Site containing built form (including gardens). It is of also of note approximately 1.9ha of public open space (31% of the Site) would be created, principally in the northwestern and southeastern areas of the Site, but also permeating throughout the built fabric.

² Turner v Secretary of State for Communities and Local Government [2015] EWHC 2728

2.0 Local Planning Policy and Guidance

The Tandridge District Core Strategy (2008) and Local Plan Part 2: Detailed Policies (2014) are the adopted Local Plan documents providing planning policy guidance at the local level for Tandridge District.

Tandridge Local Plan 2033 is the emerging local plan which went through examination in public in 2019. Further correspondence post examination between the Planning Inspectorate and TDC has occurred in relation to queries raised by the Planning Inspectorate and further examination is likely to be undertaken. The Site is allocated for development in Local Plan 2033 under Policy HSG12 and the Planning Statement provides full update on the emerging Local Plan.

Policies relevant to Green Belt from the adopted Local Plan are summarised below.

2.1.1. Core Strategy 2008

Issue 1 - Retention of the Green Belt to ensure communities remain separated and to prioritise the re-use of brown field over green field sites, in particular those used for non-residential purposes.

In relation to Lingfield paragraph 6.14 of the adopted Local Plan states:

“Lingfield is a Larger Rural Settlement that is excluded from the Green Belt. The Council is not planning for significant growth however development to meet local needs may be proposed. It is likely that redevelopments will be proposed and as with other areas the Council will require all development to be of a high design standard and to protect the character of the area. Development will be expected to comply with the Lingfield Village Design Statement. Within the Conservation Area development will need to be of a particular quality as it will be required to preserve and enhance the area.”

Paragraph 7.6 also notes:

“Tandridge is an area heavily constrained by the Green Belt and it remains an important mechanism in preventing the coalescence of the built up areas within the District. It is important to note that the Green Belt in the north of Tandridge is “fractured” and therefore is particularly important in preventing coalescence, unlike the wide areas in the south of the District which have a more regional significance.”

Policy CSP2 – Location of Development states *“There will be no change in the Green Belt boundaries, unless it is not possible to find sufficient land within the existing built up areas and other settlements to deliver current and future housing allocations”* recognising at paragraph 6.2 that it is not possible to allocate sufficient land without encroaching on the Green Belt.

Policy CSP19 – Density subsection a) notes that densities in the range of 30 - 40 dwellings per hectare, unless the design would conflict with the local character and distinctiveness of the area, are appropriate.

2.1.2. Local Plan Part 2: Detailed Policies (2014)

Policy DP10 – Green Belt

“A. The extent of the Green Belt is shown on the Policies Map. Only in exceptional circumstances will the Green Belt boundaries be altered and this would be through a review of the Core Strategy and/or through a Site Allocations Development Plan Document.

B. Within the Green Belt, planning permission for any inappropriate development which is, by definition, harmful to the Green Belt, will normally be refused. Proposals involving inappropriate development in the Green Belt will only be permitted where very special circumstances exist, to the extent that other considerations clearly outweigh any potential harm to the Green Belt by reason of inappropriateness and any other harm.”

2.1.3. Our Local Plan 2033 (Regulation 22 submission 2019)

Following its examination in November 2019, the Inspector raised a number of queries in relation to the plan and has not issued his report following examination. As with the adopted plan there is recognition at paragraphs 18.9 and 21.3 that in order to meet housing needs development in the Green Belt will be required and under this plan the Site is allocated for residential development under Policy HSG12 (**Appendix 1**).

Emerging policies in relation to Green Belt are summarised below.

Spatial Objective (SO12) – *“Maintain a Green Belt within Tandridge that serves the policy purposes set out in the National Planning Policy Framework and ensure the Green Belt endures beyond the plan period.”*

TLP03: Green Belt – *“Within the Green Belt, planning permission for any inappropriate development which is, by definition, harmful to the Green Belt, will normally be refused. Proposals involving inappropriate development in the Green Belt will only be permitted where very special circumstances exist, to the extent that other considerations clearly outweigh any potential harm to the Green Belt by reason of inappropriateness and any other harm.”*

TLP19: Housing Densities and the Best Use of Land – guides new development to *“create permanent and defensible boundaries for Green Belt where they apply.”*

2.1.4. Supplementary Planning Guidance

There is no adopted Supplementary Planning Guidance nor published guidance in relation to Green Belt.

2.2. Existing Green Belt Studies

The following section summarises existing Green Belt studies relevant to the Site. Extracts of these studies are provided in **Appendices 2, 3 and 4**.

2.2.1. Tandridge District Green Belt Assessment Part 1 (2015)

A strategic review of the Green Belt was undertaken by Tandridge District Council in 2016 (Part 1) which identified strategic swathes of land for Green Belt review. The Site lies within Strategic Area C and assessment parcel GBA 042 (**Appendix 2**) within the Part 1 Assessment. Parcel GBA 042 encompassed a large area from Lingfield in the north to Felbridge in the south. Following assessment of parcel GBA042, the Part 1 assessment identified the Site as an ‘Area for Further Investigation’ within the Part 2 study.

2.2.2. Tandridge District Green Belt Assessment Part 2 (2016)

Following the Part 1 review, the Site was identified by Tandridge District Council within the Green Belt Assessment 'Part 2: Areas for Further Investigation' (2016) for further assessment as part of an area identified as 'Area 045'. The original Part 2 assessment for Area 045 is set out in **Appendix 3. Table 2** overleaf provides the full assessment table for Area 045 with LDA Design comments/observations added.

Table 2: Part 2 Area 045 Assessment finding with observations

Assessment of Area 045 as set out in Appendix 2 of the Local Plan Green Belt Assessment (Part 2), 2016	LDA Design Comment/Observation
Description of Area	
<i>“It extends from the land opposite the church to Station Road to the east and includes various residential dwellings, with the Green Belt extending to the east of the church and the public house.”</i>	The Site forms part of this larger area and is bounded by land adjacent to the rear of the public house on Church Road to the west, back gardens of New Place Gardens to the north and Station Road to the south-east.
<i>“The development around Church Road fronts onto that road and beyond those buildings is an open space. At the eastern end are further residential dwellings, including farm buildings, which have been converted.”</i>	The Site comprises much of this open space, with New Place Farm, Station Road and properties along Town Hill Road aligning the eastern, and southern boundaries.
<i>“The Conservation Area includes a small area which is not within the Green Belt (New Place Gardens), which together with the land to the north abutting the Conservation Area comprises residential dwellings. To the south of the Conservation Area, there are further residential dwellings, which extend part way along Town Hill. Further residential dwellings outside of the Conservation Area face onto its eastern edge, before a transition to open and undeveloped land.”</i>	The north-western part of the Site is within Lingfield Conservation Area which includes built form to the north and west of the Site. No Conservation Area Appraisal has been produced for Lingfield Conservation Area.
B. Why was this selected as an Area for Further Investigation?	
<i>“The Green Belt forms part the setting of the Lingfield Conservation Area and so it is considered to make a strong contribution to preserving its setting and special character and as such has been identified as an Area for Further Investigation.”</i>	The setting of Conservation Areas is not a purpose of the Green Belt designation as defined in paragraph 138 of the NPPF.

	Tandridge District Council's Part 1 assessment records that originally Lingfield was washed over by Green Belt but was removed in 1986 in recognition of its growth and role as a larger rural settlement.
C. Summary of Consultation Comments applicable to Area for Further Investigation	
<i>"No comments have been received that are applicable to this Area for Further Investigation."</i>	No further comment.
D. Is there built form in the Area for Further Investigation and what is the nature, age and relationship with the setting of the built form?	
<i>"The Area includes residential dwellings, including converted farm buildings. The majority of the buildings within the Conservation Area, where it is designated as Green Belt, are clearly historic (being 17th and 18th century buildings as set down in their listings). Others are Victorian in appearance."</i>	Area 045 and Lingfield Conservation Area contain a diversity of built form from a variety of time periods including more recent developments and New Place Gardens and Talbot Road.
E. How much undeveloped land lies within the Area for Further Investigation and describe the undeveloped land?	
<i>"This Area is predominantly undeveloped and comprises fields, some of which have no apparent use, although there are some which appear to be used for grazing of horses."</i>	The Site comprises approximately 6.2ha of agricultural land of five field parcels used for grazing.
F. Are there any definitive boundaries within the Area for Further Investigation? Would the boundary prevent sprawl and / or does the boundary contain existing development? Is there opportunity to create a permanent boundary? Please consider this even when the definitive boundary is across the administrative boundary.	

<p><i>“If this Area were to be released from the Green Belt, there are public highways which would adequately prevent further sprawl. However, the current boundaries comprise the rear boundaries of a number of properties, parts of Church and Station Road as well as tree lines.</i></p> <p><i>It is considered that the boundaries have generally been successful in preventing sprawl.”</i></p>	<p>The current Green Belt boundary as drawn in the adopted Local Plan follows a combination of roads, hedgerows, spaced individual trees and the back garden of residential properties, in some instances cutting across them.</p> <p>Station Road and Town Hill represent permanent physical features on the ground and a more defensible and permanent Green Belt Boundary than at present.</p>
<p>G. Does the Area for Further Investigation prevent settlements from merging; partially or fully? What would be the implications if this area merged? Consider where this may be two built up areas merging. Does the area provide separation, or could it provide separation?</p>	
<p><i>“The Area for Further Investigation encompasses built-form, which falls within the same settlement, with notable built-up areas to the west/south-west and to the north/north-east.</i></p> <p><i>This area does not serve to prevent settlements from merging. However, it does serve to prevent built-up areas within the same settlement from merging.”</i></p>	<p>Built form is within the same settlement and therefore cannot constitute prevention of settlements from merging.</p> <p>Preventing merging of areas within the same settlement is not a purpose of the Green Belt designation.</p>
<p>H: What is the current use of the land and how does this relate to the purposes of the Green Belt?</p>	
<p><i>“The Area includes a mixture of uses, including residential, which do not relate well to the purposes of including land in the Green Belt. The remaining areas of land comprise fields, with a small part used as a cemetery. Many of the fields do not appear to be in any form of active use, but it is apparent that some are used for grazing, and relate well to the purposes of including land within the Green Belt.”</i></p>	<p>Land use is not a consideration of the five purposes of the Green Belt as set out in paragraph 138 of the NPPF.</p> <p>The use of land within Green Belt relates to where a development is considered ‘appropriate’ or ‘inappropriate’ as defined by paragraphs 149 and 150 of the NPPF.</p>
<p>I. Is there a Conservation Area within the Area for Further Investigation? Please set out the details of the Conservation Area; including the size of the Conservation Area, the boundaries, the setting of it within the Green Belt, the reason why it is a Conservation Area. Also provide information and consider any adjacent Conservation Areas.</p>	

<p><i>“This Area for Further Investigation relates to the eastern end of the Lingfield Conservation Area. There is no appraisal. However, the character of this Area is clearly open and provides a rural setting for the church and the approach to it, as well as including the historic buildings to the east, some of which formed part of a farm. The Conservation Area also includes land, which is designated as Larger Rural Settlement, including part of New Place Gardens. It is only this eastern end of the Conservation Area, which is located within the Green Belt.”</i></p>	<p>The protection of Conservation Areas and their setting is not a purpose of the Green Belt Designation.</p> <p>Whilst Conservation Areas may indicate historic settlement and therefore would be of relevance to Green Belt purposes in terms of preserving the settlement and special character of historic towns as set out in paragraph 80 of the NPPF, this would be in relation to the whole of Lingfield and not Lingfield Conservation Area itself.</p> <p>Paragraph 144 of the NPPF is clear in that if the character of the village needs to be protected for other reasons that our outside the purposes of the Green Belt designation, other means should be used.</p>
<p>J. Has this area been subject to development pressure? Refer to planning applications / appeals and identify the key Green Belt considerations mentioned in the report.</p>	
<p><i>“There is no visual evidence of development pressure and this is supported by the planning application search.”</i></p>	<p>No further comment.</p>
<p>K. In line with paragraph 81 [now 145] of the National Planning Policy Framework, what opportunities does the Green Belt offer?</p>	
<p><i>This Area includes a public footpath, which cuts through the area, leading from the built-up area. The land is otherwise predominantly privately owned. As such this area provides some public benefits”.</i></p>	<p>This footpath (381a) is currently in poor condition and provides limited access and recreational amenity. The Proposed Development would improve the usability and safety of the route.</p>
<p>L: Using all the above information, what is the final conclusion?</p>	
<p><i>The documentation relating to this Area’s designation as Conservation Area does not clearly indicate the reasons for its designation, but it is assumed it relates to the historic</i></p>	<p>The protection of Conservation Areas, Listed Buildings and their setting is not a purpose of Green Belt designation as defined in paragraph 134 of the NPPF.</p>

layout of the village and the fact that a farm existed on the outer edges of the village, which would be surrounded by open land as a result of its use.

The Area for Further Investigation provides a rural setting and approach to the church. It is considered that the siting and scale of the Green Belt in this location serves to prevent sprawl, the merging of built-up areas and encroachment upon the countryside and that this is essential in preserving the setting of this part of the Conservation Area. Whilst built form is visible from within this Area for Further Investigation, overall it is open and makes a notable contribution to the openness of the Green Belt. Additional protection has been considered but it has been concluded that no stronger protection is either necessary or possible. Accordingly, this Area is not recommended to be considered further as part of the Green Belt Assessment."

The Site is contained by Station Road and Town Hill road which forms a definitive and permanent physical edge to the town and the countryside beyond.

The merging of built up areas within settlement is not a purpose of the Green Belt designation.

In conclusion, the Stage 2 assessment has erred on a number of factors in its consideration of the Site and its contribution the Green Belt.

2.2.3. Tandridge District Green Belt Assessment Part 3 (2018)

Following the Site's detailed Green Belt Assessment in Part 2 as set out in **Table 2** of this report, the Site was assessed again in the Part 3 Green Belt Assessment (2018) as part of Tandridge District Council's exceptional circumstances testing.

The Part 3 assessment notes at paragraph 3.30 *"For those areas, where it has been concluded that it effectively meets at least one of the Green Belt purposes, Part 2 recommends that those areas are not considered further as part of the Green Belt Assessment. However, it acknowledged that these areas may be considered further in terms of exceptional circumstances as part of the Local Plan process."*

The Part 3 assessment also includes the findings of the Landscape Capacity and Sensitivity Study (2017) which was not available for Parts 1 and 2 of the Green Belt Assessment.

The Site is identified in the Part 3 assessment as 'LIN 030 - Land at the Old Cottage, Station Road, Lingfield' (**Appendix 4**) with the following observations recorded on pages 85 - 87:

"...Whilst the area is generally open, it is also contained by built form and accordingly development is likely to have a limited impact with respect to its encroachment on the countryside, sprawl, merging with other settlements...It would also, by infilling this area make a positive contribution to settlement form". [own emphasis added]

"...the impact of development could be reduced through buffers, landscaping and sensitive design, in particular it could be designed such that it conserves the setting of the Lingfield Conservation Area. Further, Town Hill which aligns the southern boundary and Station Road marking the eastern boundary provide robust and defensible boundaries, whilst making a positive contribution to settlement form in this location. As such this would limit the impact on the wider Green Belt's ability to continue to serve these purposes." [own emphasis added]

"Furthermore, the site comprises undeveloped land located on the edge of a Tier 2 settlement and as such is in a preferred location on sustainability grounds, being within close proximity to a GP surgery, schools, countryside, employment and public transport." [own emphasis added]

"In addition, the site is considered, in principle, suitable for development from a landscape and ecology perspective subject to mitigation measures. Other potential adverse effects such as the impact upon the setting of listed buildings, surface water flooding and ground water contamination could similarly be adequately mitigated." [own emphasis added]

"The Green Belt in this location serves the Green Belt purposes in terms of safeguarding from encroachment, preventing sprawl, preventing settlements from merging and preserving the Lingfield Conservation Area, and as such its development would impact up on the site's ability to serve these purposes however as the site is physically and visually well contained by built form on three sides, and subject to the use of sensitive design, buffers, landscaping and robust and defensible boundaries, its impact on the wider Green Belt would be limited and its harm to the Green Belt purposes in this location mitigated. Accordingly, development is likely to have a limited impact on openness because it would infill a gap confined by built development and roads in the built-up area. It would 'complete' the settlement form. [own emphasis added]

“...It is considered that, subject to appropriate design, development would make a positive contribution to settlement form, whilst providing an opportunity to enhance the Lingfield Conservation Area through townscape design.” [own emphasis added]

In concluding, the Part 3 assessment states:

“Having considered all of the factors set out in section 3 of the paper “Green Belt Assessment Part 3: Exceptional Circumstances and Insetting” it is considered, as a matter of planning judgement, that this site does justify the exceptional circumstances necessary to recommend amendment of the Green Belt boundary.”

In light of TDC’s findings, the Site was allocated for residential development under allocation HSG12 within the emerging Local Plan. Whilst it is acknowledged that the exceptional circumstances test is different to the VSC test, the level of potential harm and principle of development at the Site has been found acceptable by TDC.

3.0 Assessment of Green Belt Purposes

Table 3 below provides an assessment of the Proposed Development against the five purposes of Green Belt as defined in paragraph 138 of the NPPF. The assessment is based on guidance provided by the NPPF, National Planning Policy Guidance (NPPG) and guidance produced by the Planning Advisory Service (PAS) and Local Government Association (LGA) in relation to Green Belt (2015).

As noted in **Section 1.0**, the consideration of any other harm and balancing exercise of VSC is undertaken in the Planning Statement and other technical documents submitted as part of the planning application.

Table 3: Assessment Green Belt Purposes	
Assessment Criteria	Assessment
GB Purpose 1: To check the unrestricted sprawl of large built up areas	
<i>The proximity and visual connectivity of the area / site to the settlement's edge</i>	<p>The Site is located at the settlement edge of Lingfield. The residential suburbs of Lingfield adjoin the Site to the north and west.</p> <p>The south the Site is abutted by the B2028 Tower Hill which has a line of ribbon residential development along it. The east of the Site is contained by Station Road. Residential properties at New Place Farm and along Station Road, including Lingfield Station, lie just beyond slightly further east. To the southeast lies the Eden Brook river and parkland of the Lingfield Park estate.</p> <p>The Site's visual connectivity to the wider landscape is limited to its local context as assessed in the LVIA given screening from existing built form and vegetation. The ZTV (LVIA Figure 4) indicates that theoretical visibility is limited to the west as a result of intervening built form.</p> <p>Existing residential development at Tower Hill to the south, Church Road to the west, New Place Gardens to the north and New Place Farm and Station Road to the east are visible from within and nearby the Site further underlining the Sites association with existing built form of Lingfield.</p>
<i>The form and extent of definition of the existing urban edge.</i>	<p>A strong urban edge is created by the alignment of Station Road and Town Hill Road which form the Site's southern and eastern boundaries.</p> <p>To the west and north existing built form lies adjacent to the Site and includes properties at New Place Gardens and dwellings on Church Lane.</p> <p>Built form extends eastward beyond the Site to New Place and to the junction of Station Road with Town Hill road.</p>

<p><i>The extent to which the area / site is contained.</i></p>	<p>The Site is visually well contained by boundary vegetation, vegetation and the roads of Tower Hill and Station Road, and existing built form of Linfield to the north and west. The relative flat topography of the Site and surrounding area also serve to limit the visibility of the Site,</p> <p>The Zone of Theoretical Visibility of the Proposed Development is illustrated in Figure 4 of the LVIA and existing views from the surrounding landscape of the Site are presented in the LVIA’s accompanying photograph panels and photomontages (see LVIA Figure 7 and 8). Both of these figures evidence the relative visual containment of the Site and the likely limited visibility of the Proposed Development.</p> <p>The design of the Proposed Development has been informed by sensitive siting of built form to pull back from the boundaries of the Site, retaining perimeter vegetation but also internal hedgerow boundaries.</p> <p>New tree planting is also proposed throughout the Site and along relevant boundaries and areas of public open space, drawing the character of the parkland of the Eden Brook into the Site in the southeast and providing a generous area of new public open space in the north adjacent to the existing footpath.</p> <p>Full details of the design evolution are provided in the Design and Access Statement (DAS).</p>
<p><i>Whether its development would round off the urban edge.</i></p>	<p>Development in this area would round off the urban edge and provide a more defensible Green Belt boundary along Station Road and Town Hill Road.</p>
<p><i>The existence of clearly defined boundaries and how the area/site relates to the existing structure of the landscape surrounding.</i></p>	<p>Current boundaries include roads, hedgerows, and the rear gardens of existing properties. The Site is contained by Station Road and Town Hill road which form a physical boundary between Lingfield and the countryside beyond.</p>
<p>Purpose 1 Conclusion:</p> <p>The Site lies within and reads as part of the existing settlement of Lingfield, being surrounded to the north, west, south and in part east by existing built form. The alignment of Tower Hill and Station Road form distinct physical boundaries to the Site, containing it from the wider countryside to the south and east. Vegetation along these routes, which would be retained and enhanced as part of the Proposed Development, would further assist limiting visibility and containing built form, rounding of the edge of the settlement.</p> <p>In light of the above it is considered the Proposed Development would not result in the unrestricted sprawl of built form, being well contained by existing roads and vegetative</p>	

<p>boundaries. There would be no localised sprawl of the Proposed Development as built form is contained within the existing field structure with generous public open space proposed in the both the north and southeast of the Site.</p> <p>Lingfield would not appear to sprawl as a result of the Proposed Development and there would be no harm to this purpose as a result of the Proposed Development. The strategic function of the remaining Green Belt in the prevention of Lingfield from sprawling remain.</p>	
<p>GB Purpose 2: To prevent neighbouring towns merging into one another</p>	
<p><i>The degree to which development would physically reduce the distance between the urban edge and neighbouring settlements.</i></p>	<p>The closest settlements to the Site (measured from the Site boundary) are as follows:</p> <ul style="list-style-type: none"> • Lingfield College and prep school (development in the Green Belt) – approximately 175m east; • Lingfield Racecourse Main Grandstand (development in the Green Belt) – approximately 330m southeast; • Dormansland (defined village in the Green Belt) – approximately 1.2km southeast • Felcourt (village washed over by Green Belt) – approximately 1.78km south; and • East Grinstead (Town) – approximately 3.7km south. <p>The Proposed Development would not extend built form further south and east than existing built form at the southern and eastern edges of Lingfield located on the Town Hill and Station Road routes. These roads provide a distinct on the ground physical boundary to Lingfield.</p> <p>The provision of undeveloped greenspace in the southeast of the Site adjacent to Station Road would provide a further buffer of approximately 30m within the Site to settlements to the southeast.</p>
<p><i>The degree to which the development would result in the perception that distances between settlements have reduced.</i></p>	<p>The Proposed Development would not extend new built form southward or eastward further than existing built form on Tower Hill and Station Road.</p> <p>The provision of public open space and retention of existing boundary hedgerows on the southern and eastern boundaries of the Site would provide further aid the perceptual separation between the Proposed Development and built form to the south and east both at Lingfield Racecourse and Dormansland further east.</p> <p>Views to and from the Site to the surrounding landscape are presented in the LVIA Figure 7 which illustrates the degree of visual containment afforded to the Site and the lack of intervisibility between the Site and any settlements. In these views the Proposed Development would be seen as a contained development, set within the confines of Lingfield and existing hedgerow network of the Site.</p>

	<p>It is concluded, there would be no perceptible reduction in the distances between the Proposed Development and neighbouring settlements, as a result of the existing physical separation from them, the visual containment of the Proposed Development by existing vegetation and the presence of permanent boundaries such as Town Hill and Station Road.</p>
<p><i>The degree to which the site / area relates to the scale and separate identity of the settlement.</i></p>	<p>The size of the Site is relatively small in comparison to the nearby settlement of Lingfield, the suburbs of which adjoin the Site to the north, west south and east.</p> <p>The containment of Site by Tower Hill and Station Road means the land reads as part of the settlement of Lingfield rather than wider countryside beyond.</p> <p>The public open space proposed in the southeast of the Site would draw the parkland character of the Eden Brook into the Site whilst maintain sufficient separation and identity to Lingfield Racecourse, Lingfield College and Dormansland further east.</p>
<p>Purpose 2 Conclusion:</p> <p>The Site plays no role in relation to preventing neighbouring towns merging into one another and the Proposed Development would not result in harm to this purpose.</p> <p>The strategic function of the Green Belt would remain with the separation and distinct separate identity of settlements remaining intact.</p>	
<p>GB Purpose 3: To assist in safeguarding the countryside from encroachment</p>	
<p><i>The existence and scale of existing development within the Green Belt in the vicinity of the area / site.</i></p>	<p>There are a number of built developments within the Green Belt in the locality of the Site. These include individual dwellings at the junction of Station Road and Town Hill, New Place and New Place Farm and dwellings along Station Road.</p> <p>To the southeast, Lingfield Racecourse represents a substantial development within the Green Belt.</p> <p>The residential of suburbs of Lingfield, which is excluded from the Green Belt, lie adjacent to the north and west of the Site.</p> <p>To the south and east of the Site beyond Station Road and Tower Hill lie open countryside albeit with the substantial developments of Lingfield Racecourse and Lingfield College.</p> <p>Existing land uses adjacent to the Site exert an urbanising influence on the Site and locality, including neighbouring residential built form along Tower Hill, Station Road, Church Lane and New Place Gardens.</p> <p>Given the existing established vegetation of the locality and topography the encroachment of existing built form of Lingfield is relatively well contained and not visually notable from the wider countryside beyond the Site further south and east.</p>

<p><i>The degree to which the character of the area / site is 'settlement fringe' rather than 'open countryside' or of rural character.</i></p>	<p>The Site is bordered on four sides by built development with the north, west and majority of the southern edge bounded by residential suburbs of Lingfield.</p> <p>The Site is also contained by Tower Hill and Station Road and subsequently reads as part of Lingfield rather than the wider countryside beyond the settlement.</p> <p>The relatively flat topography of the Eden Brook and parkland of the wider Lingfield Estate landscape represents the open countryside that lies between Lingfield and Dormansland further east, albeit large scale built form of Lingfield Racecourse and Lingfield College and prep school are visible in this locality.</p> <p>Other urbanising features such as the railway are relatively visually unobtrusive given vegetation lining them but do contribute to the sense of being within Lingfield rather than the wider countryside.</p> <p>The Proposed Development seeks to retain existing features such as trees and hedgerows whilst also providing generous area of public open space both in the north of the Site and also in the southeast.</p>
<p><i>The nature of the existing settlement edge, i.e. whether it is a soft edge or a hard urban edge.</i></p>	<p>The existing Green Belt boundary is formed by a combination of roads and rear garden boundary vegetation. It is currently a tortuous and convoluted boundary.</p> <p>The roads of Town Hill and Station Road provide distinct on the ground physical features to the settlement edge of Lingfield.</p> <p>The provision of public open space in the southeast of the Site east of the Site along with the retention of existing hedgerows and new planting would retain a 'soft' green edge to Lingfield in this area.</p>
<p>Purpose 3 Conclusion:</p> <p>The Site does not contribute to safeguarding the countryside from encroachment given its characteristics and association with the existing settlement of Lingfield.</p> <p>The Site is bordered by existing built form on four sides and the alignment of Tower Hill and Station Road provide distinct physical boundaries between the settlement and the wider countryside beyond.</p> <p>The Proposed Development would include provision of public open space in the north and south of the Site and also within the built form itself, aiding the assimilation of new development and maintaining a soft green edge to this area of Lingfield.</p> <p>The Proposed Development would have very limited visibility from the wider countryside as evidenced in the LVIA and when glimpsed views were possible seen in the context of other large built forms such as Lingfield Racecourse and Lingfield College.</p> <p>There would be no harm to the performance of Green Belt in relation to encroachment of the countryside and the essential countryside character of the Lingfield Estate and countryside beyond would remain intact.</p>	
<p>GB Purpose 4: To preserve the setting and special character of historic towns</p>	

<p><i>The nature of the existing historic settlement</i></p>	<p>The Lingfield Village Design Statement records the origins of the town “lie many centuries ago as a clearing in the Great Forest which covered much of the Weald at that time”. The town grew from two medieval settlements at Old Town, a cluster of buildings around the Church of St Peter and St Paul’s, and Plaistow Street in what is now the main high street, both located to the west of the Site.</p> <p>More recent growth of Lingfield has seen further suburban expansion predominantly as infill developments in cul-de-sac arrangements including Lincoln’s Mead to the southwest, Rushfords in the northeast and at New Place Gardens which backs on to the site. Built form has also intensified along Station Road and more recent development is present along the north of Racecourse Road at The Tannery.</p> <p>Further historical analysis is provided in the Heritage Impact Assessment accompanying the planning application.</p>
<p><i>The Site’s contribution to any historic approaches</i></p>	<p>The Site lies to adjacent to the B2028 Town Hill which is the main approach to Lingfield from the east. From this route the Site behind boundary hedgerows with the church spire of St Peter and St Paul’s in the background can be seen. Parkland of the Eden Brook and Lingfield Estate is also characteristic of approaches from the east along with the built form of Lingfield Racecourse.</p> <p>Footpath 381a which links the New Place and Lingfield railway station to the village core is also likely to be a historic approach to the village. Given the railway station is a main arrival gateway this approach is of raised importance but is at present not of great quality.</p> <p>The Proposed Development would not result is uncharacteristic change to the historic approach to Lingfield from the B2028 with the composition of parkland, hedgerows and built form visible.</p> <p>The new public space and active frontages to the footpath would improve this approach. Whilst built form would be more visible in views, new public open space and planting would create a more inviting approach whilst also allowing more opportunities for views toward the historic core.</p>
<p><i>The Site’s relationship to the historic core. Are there views of the historic core and / or settlement landmarks from the Site?</i></p>	<p>The Heritage Impact Assessment notes the Site contributes to the appreciation of the village and also to the setting of the church and other listed buildings within the village core (para 3.7 – 3.8). The northern part of the Site is within Lingfield Conservation Area although there is no Conservation Area Appraisal that elaborates on why this area of the Site was included.</p> <p>Although not part of the historic core, the Site also contributes to the setting of New Place Farm (HIA para 3.10).</p>

	<p>Views of the church spire are possible from within and across the Site from Town Hill and Station Road, which acts a landmark to the historic core of the village although other historic core buildings are screened by intervening vegetation.</p> <p>The HIA concludes there would be harm to the heritage significance of the Lingfield Conservation Area and setting of the Grade I listed St Peter and St Paul’s church as a result of the Proposed Development (para 4.5). The HIA judges this harm to be less than substantial and on the medium to low end of the harm spectrum.</p> <p>The HIA concludes there would be no harm to other listed buildings in the vicinity nor to any other heritage assets.</p> <p>The Proposed Development’s layout seeks to align to local landmarks including St Peter and St Paul’s church and the oasthouse at New Place Farm, allowing an appreciation of these and creating a sense of place to the development. Proposed new public open space across the Site but principally in the north and southeast would also create new opportunities for the appreciation of heritage assets and local landmarks.</p>
<p><i>The physical distance to the historic core</i></p>	<p>The straight-line direct distance to the centre of Lingfield (St Peter’s Cross) is 445m.</p> <p>The straight-line distance to the historic core of Lingfield (St Peter and St Paul’s church) is approximately 104m.</p>
<p>Purpose 4 Conclusion:</p> <p>The Site itself does contribute to preserving the setting and special character of the historic town of Linfield, both visually, spatially and culturally.</p> <p>The Proposed Development would alter the setting via the replacement of agricultural land with new built form albeit built form is characteristic of the setting and character of the village. The Proposed Development has been designed to mitigate these impacts providing generous areas of public open space and aligning the layout of built form with visual landmarks to allow views to remain and create new views.</p> <p>New public open space and planting would enhance the setting of the village in these areas, particularly along footpath 381a, and allow new opportunities for its appreciation.</p> <p>In light of the above it is concluded the Proposed Development would result in some limited harm to preserving the setting and special character of the historic town.</p>	
<p>GB Purpose 5: To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</p>	
<p><i>Consider if development would impact upon the likelihood of sites within the existing urban area in coming forward, and whether development in</i></p>	<p>Development on this relatively small site would not impact on the likelihood of existing brownfield sites coming forward should they be identified for development.</p>

<p><i>the broad location would facilitate the possibility of reusing previously developed land.</i></p>	<p>Development of brownfield sites alone would not need housing need for TDC and the need for Green Belt release to meet unmet housing need is recognised within the emerging local plan by TDC through the allocation of this and other Green Belt sites.</p>
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4.0 Conclusions

Purposes of Green Belt

This Green Belt Assessment in relation to the five purposes of Green Belt designation concludes:

- **Purpose 1: To check the unrestricted sprawl of large built up areas** - the Site does not contribute to this purpose and the Proposed Development would not result in sprawl of large built up areas.
- **Purpose 2: To prevent neighbouring towns merging into one another** - the Site does not contribute to this purpose and the Proposed Development would exert no impact on the performance of the Green Belt in preventing neighbouring towns merging into one another.
- **Purpose 3: To assist in safeguarding the countryside from encroachment** - the Site not contribute to this purpose and the Proposed Development would not result in harm to this purpose of the Green Belt.
- **Purpose 4: To preserve the setting and special character of historic towns** - the Site does contribute to this purpose and the Proposed Development would result in some limited harm to this purpose but would also create enhancements and new opportunities for appreciation of the historic core of Lingfield.
- **Purpose 5: To assist in urban regeneration, by encouraging the recycling of derelict and other urban land** – The Site would not compromise other brownfield sites coming forward. The need to release Green Belt land to meet unmet housing need is recognised by TDC.

The Proposed Development would deliver beneficial enhancements to the Green Belt as advocated by paragraph 145 of the NPPF including improving access and opportunities for outdoor recreation via areas of public open space throughout the Site, enhancing biodiversity at a Site scale and allowing greater appreciation and new opportunities of heritage assets from within the Site.

In considering the potential harm to these five purposes in the round along with beneficial enhancements proposed as a result of the Proposed Development, it is concluded that the overall effect on the Green Belt purposes is positive.

Visual openness

The LVIA records the visibility of the Proposed Development is very limited, restricted largely to within close proximity of the southern and eastern boundaries of the Site. In these views. Longer distance views (approximately 200m+) are not possible given intervening built form and vegetation.

In close range views the Proposed Development is set within the landscape amongst established field boundary vegetation which would be retained and enhanced with new planting. Built form of Lingfield is characteristic of these views with residential form surrounding the Site on four sides. The composition and character of these views, would remain although new built form within the Site would reduce the visual openness of the

Site itself. The provision of new public open space would mitigate to some extent the reduction of visual openness within the Site and the visual openness of the wider locality would be unaffected.

Figures

Figure 1: Site Location and Green Belt

Figure 2: Proposed Development in Green Belt Context



LEGEND

-  Site Boundary
-  Green Belt

LDĀ DESIGN

PROJECT TITLE

LAND WEST OF STATION ROAD,
LINGFIELD

DRAWING TITLE

Figure 1: Site Location and Green Belt

ISSUED BY	Oxford	T: 01865 887050
DATE	22.02.22	DRAWN SG
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STATUS	Draft	APPROVED BC

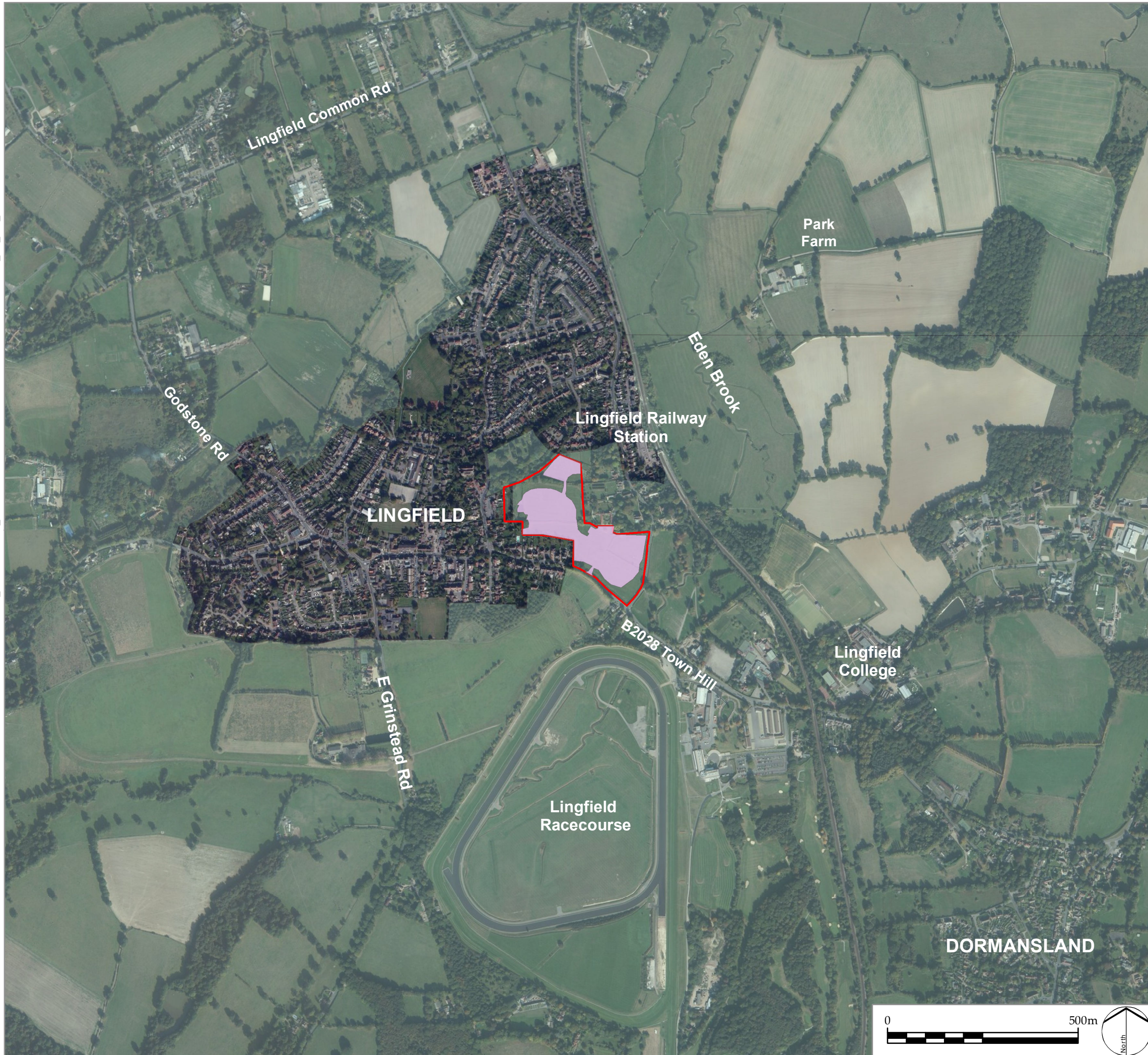
DWG. NO. 7324_GB_001

No dimensions are to be scaled from this drawing.
All dimensions are to be checked on site.
Area measurements for indicative purposes only.


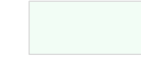

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Sources: Ordnance Survey





LEGEND

-  Site Boundary
-  Green Belt
-  Proposed Development Built Area (inc. gardens)

LDĀ DESIGN

PROJECT TITLE

LAND WEST OF STATION ROAD,
LINGFIELD

DRAWING TITLE

Figure 2: Proposed Development in
Green Belt Context

ISSUED BY	Oxford	T: 01865 887050
DATE	09.03.22	DRAWN SG
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STATUS	Final	APPROVED BC

DWG. NO. 7324_GB_002

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Sources: Ordnance Survey



Appendices

Appendix 1: Policy HSG12 from Emerging Tandridge Local Plan

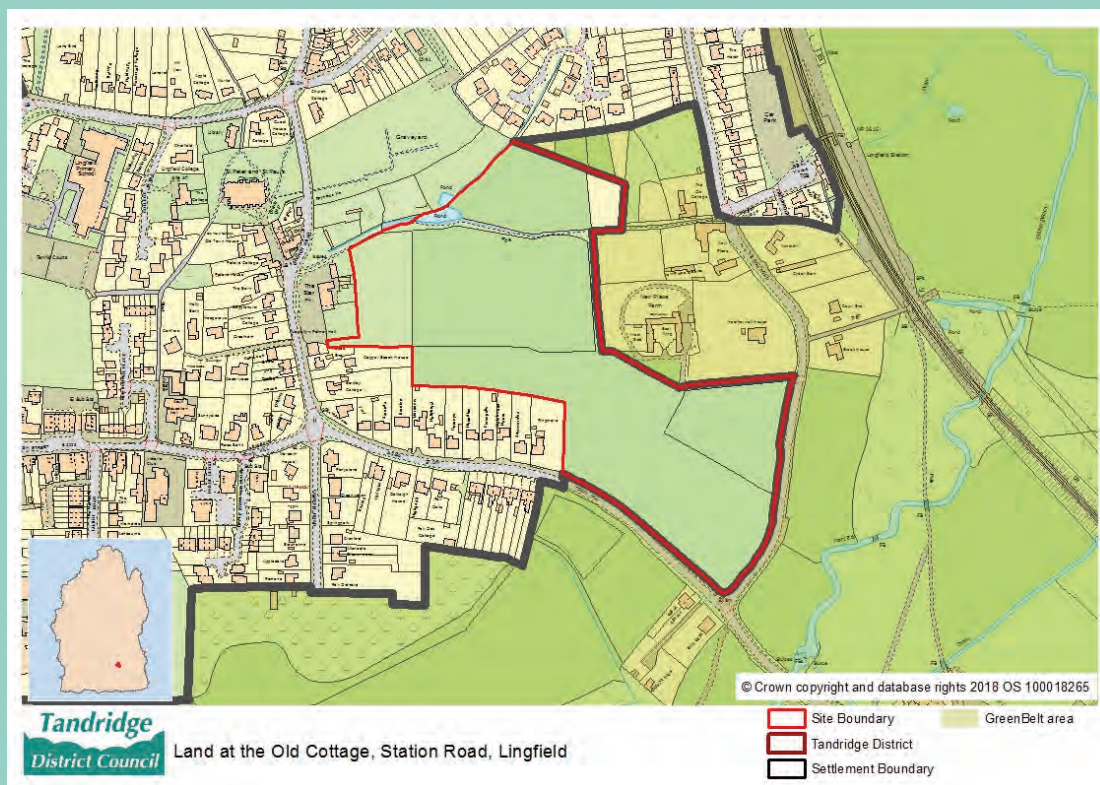
HSG12: Land at The Old Cottage, Station Road, Lingfield

Site Size:	6.3ha	Use / Estimated Site Yield:	(C3) 60
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Site Description:

The site, **also known as Star Fields**, is an agricultural field, adjacent to the south east boundary of Lingfield. The site has residential properties to the south and west, and a graveyard to the north. The site is predominantly within a Conservation Area, **with several listed buildings (including Grade I Pollard House/Cottage) located off-site to the west beyond the intervening Star Public House. Grade II* listed structures also sit to the east. Sympathetic consideration of the historical setting will be necessary in any layout as well as in the choice of materials. and a Grade II* listed building sits to the east.**

Other evidence-based references: HELAA LIN 030 and Urban Capacity Study UCS 11



Site-specific Policy Requirements:

In addition to **according with all relevant development plan policies and material considerations**, complying with other relevant policies of Our Local Plan including those relating to affordable housing and design, applications will be supported where the following site-specific matters/requirements are addressed:

Green Belt Amendment

The **exceptional circumstances** to justify the release of this site from the Green Belt have been identified and the allocation of this site has resulted in an alteration to the Green Belt boundary. Due to the undeveloped nature of the land, proposals will be required to provide 40% affordable housing.

Conservation

- I. Development must conserve and enhance the Conservation Area and be sympathetic to the setting of both the wider historic area and nearby listed buildings. The impact on the conservation area and nearby listed buildings will be compensated for through quality and sensitive design and layout.
- II. **All development proposals must be accompanied by a detailed heritage assessment.**

Ecology

- III. Opportunities for green infrastructure enhancements and habitat protection will be maximised by proposals. Areas affected by s41 habitats sensitively avoided in site layout and design.

Landscape

- IV. To limit the impact to the wider landscape, development should be focused toward the areas adjacent to existing built form and the north of the site

Public Rights of Way

- V. **Any Public Right of Way within or abutting the site should be retained in liaison with Surrey County Council and TLP31.**

New Defensible Boundaries

- VI. Design and layout should actively seek to create and preserve, clear and defensible boundaries between the edge of the site and the Green Belt to which it is adjacent

Flooding/water-related matters

VII. Proposals should respond to the risk of fluvial flooding (Flood Zone 2) in the south-east corner of the site, as well as ponding in the south-east corner from surface water flooding, the site's location close to an area at risk of reservoir flooding (Bough Beech) and the potential extension of flood zones over a larger area as a result of climate change.

Infrastructure

VIII. In accordance with the Infrastructure Delivery Plan (IDP), financial contribution to/onsite provision of the following infrastructure are relevant to the development of this site and will be a requirement of any proposal:

- Mobility impaired persons bridge at Lingfield Station
- Opportunities to improve Lingfield station car park
- Rebuilding of Lingfield Surgery
- On-site provision of open space

Appendix 2: Tandridge District Green Belt Assessment Part 1 (2015) Appendix D Parcel Assessments Extract (Parcel GBA042)

D.43 GBA 042

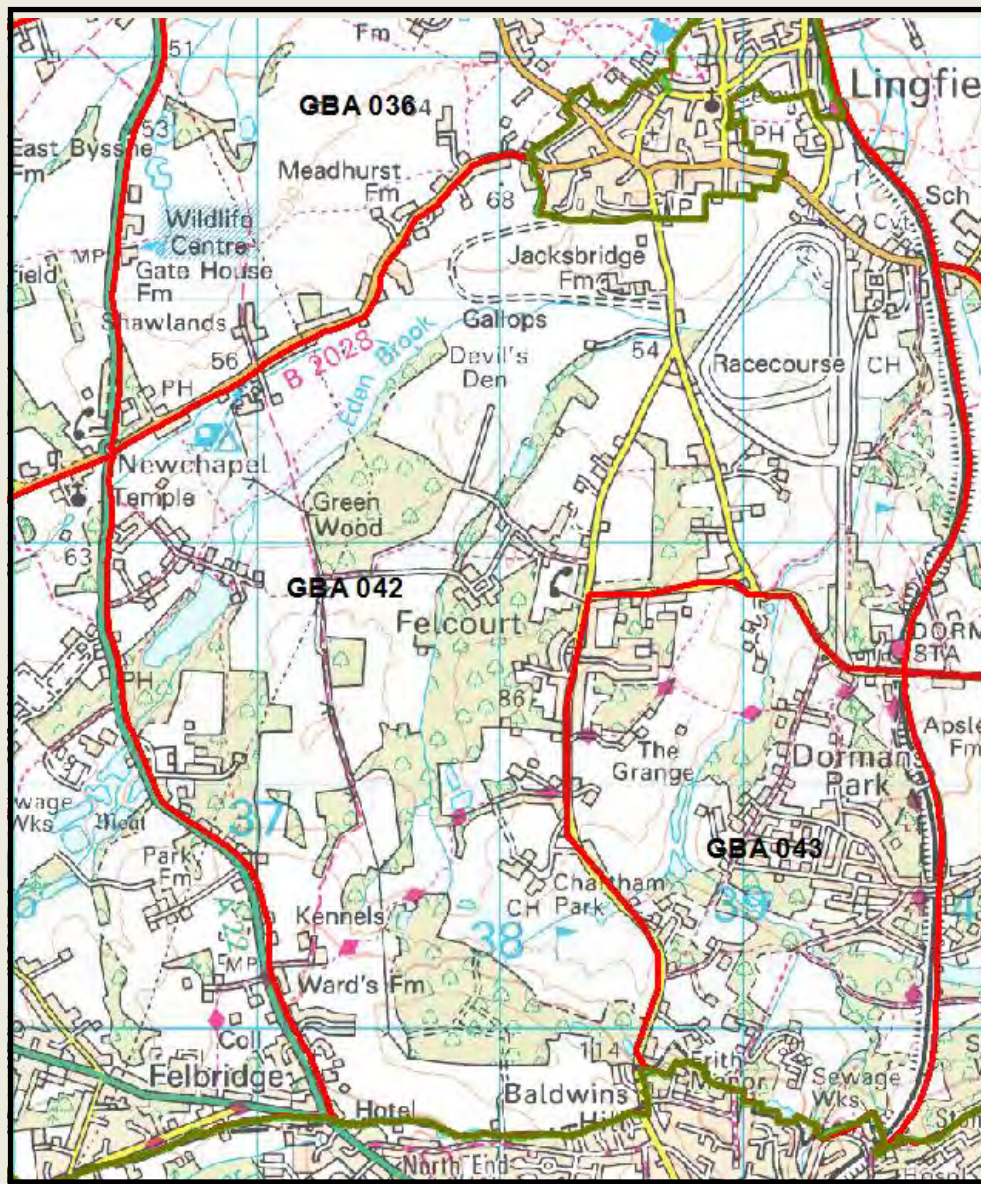


Figure D.43.1 – Map of GBA 042

- D.43.1 GBA 042 stretches south from the edge of the inset settlement of Lingfield, to north of East Grinstead on the border with Mid Sussex. The area's topography varies, sloping downwards from Lingfield to the south, and rising to the north close to the Mid Sussex border. Much of the central area of the parcel is wooded, screening views across the area. Lingfield Racecourse, the famous horse racing venue, is located in the northern area, south of Lingfield. Within part of this parcel is Felcourt, a small concentration of dwellings along Felcourt Road. A small lake is located in the western corner of the parcel; the Eden Brook also runs through this area. A large golf course is situated in the southern area along Felcourt Road.



Figure D.43.2 - Looking south from Chartham Park golf course towards East Grinstead. The Golf Course represents a sizeable amount of open countryside in this area and is one of the main leisure uses in the Green Belt, along with the race course.



Figure D.43.3 - Dwellings at The Glebe branch out from the road into the Green Belt.



Figure D.43.4 - Residential development at Felcourt.



Figure D.43.5 - Lingfield from the fields to the South. The settlement sits on a heightened elevation to the surrounding countryside.

Purpose 1: to check the unrestricted sprawl of large built-up areas

What are the characteristics of development, if any? i.e. is the development which exists; planned, ad-hoc or sporadic?

- D.43.2 The built up area of Lingfield is to the north of the parcel and Lingfield Racecourse, the famous horse racing venue, is located in the northern area, south of Lingfield. Within part of this parcel is Felcourt, a small concentration of dwellings along Felcourt Road. A large golf course is situated in the southern area along Felcourt Road.

Has this changed significantly since the Green Belt was first designated?

- D.43.3 Felbridge was not washed over with Green Belt officially until the 1974 Surrey County Development Plan. The settlement boundaries for Felbridge were not defined until the 1986 South of the Downs Local Plan and although the area has been infilled and intensification, specifically along Copthorne Road and Crawley Down Road, the settlement boundaries have remained the same to present day.

- D.43.4 The Green Belt did not initially come as far south as Lingfield when it was first drawn in the 1958 Surrey County Development Plan. Though an extension was proposed in 1959, it was not until 1974 that the Surrey County Development Plan included the southern part of the District in the Green Belt, washing Lingfield over. By 1986, due to growth of Lingfield and in recognition of its function as a larger rural settlement, Lingfield was inset from the Green Belt. The Green Belt boundaries have not been altered since then.

- D.43.5 In terms of Lingfield Racecourse, it has been in the Green Belt, but the designation has not prevented redevelopment and intensification of the site. As an example, permission was granted in 2007 for the demolition of 22 existing buildings and the erection of replacement viewing terraces and boxes, as well as the erection of an integrated leisure building that included a 120-bed hotel, a golf club house and a leisure club.

Is any area of the parcel physically connected to a built up area/settlement?

- D.43.6 The parcel is adjacent to East Grinstead, within the District of Mid Sussex to the south. The parcel is also adjacent to the inset settlement of Lingfield to the north. A small part of Felbridge is within the parcel to the south west.

Is there a strong, defensible boundary between the existing built up area and the Green Belt, for example: main roads, built form, watercourses, etc.? Or is there another notable feature which is more effective in preventing urban sprawl i.e. a hilltop or ridgeline, or drainage ditch, etc.?

- D.43.7 The settlement boundaries around Lingfield are defined by the residential dwellings. However, the recreation ground at the end of Talbot Road provides long distance views and creates a blur between town and country. As such this area has been identified as an area for further investigation (this area is labelled 044 on the map in Appendix F).
- D.43.8 The built area of Felbridge is fairly well defined by the residential dwellings within the settlement. However, development occurs east from London Road at The Limes and The Glebe. Together these represent a concentration of built form in the Green Belt, and given the almost continuous pattern of development between them stretching south into East Grinstead they would be considered ribbon development. Further sporadic development also exists along London Road although it is broken up by open fields and woodland. This is also true for the adjacent parcel 041. As such, this area has been identified as an area for further investigation (this area is labelled 041 on the map in Appendix F).

Conclusion on Purpose 1

- D.43.9 The strategic assessment set out in Appendix B recognises the importance the Green Belt plays restricting sprawl from East Grinstead. To understand this further, this area has been identified as a further area for investigation (this area is labelled 041 in the map in Appendix F). However, also within this area is some development that extends along to The Limes and The Glebe, and has been identified as an area for further investigation (this area is also labelled 041 on the map in Appendix F).
- D.43.10 Whilst the settlement of Lingfield is defined by the residential dwellings within it, there is a recreation ground at the end of Talbot Road, which blurs the line between town and country. As such, this area has been identified as an area for further investigation (this area is labelled 044 on the map in Appendix F).
- D.43.11 It is noted that there have been some changes within the Green Belt, such as the Lingfield Racecourse. However, due to the nature of the development it cannot be sprawl related to this purpose.

Purpose 2: to prevent neighbouring towns merging into one another

What settlements/towns are within the parcel?

- D.43.12 The parcel lies between Lingfield and Dormansland, in conjunction with 035 and 044. The parcel also contains a small part of Felbridge, and East Grinstead is to the south of the parcel, within the District of Mid Sussex. Dormans Park is also located in the adjacent parcel GBA 043 to the east.

Would the reduction in the gap notably compromise the separation of settlements and the overall openness of the parcel visually or physically?

D.43.13 A reduction in the gap between the two settlements of Dormansland and Lingfield could cause them to merge as they are not separated by a considerable distance. However, the railway line provides a partial physical barrier to prevent them merging. The gap between Dormans Park and Felbridge is a significant distance that there is no risk that the settlements would merge.

D.43.14 Felbridge and East Grinstead have already merged, so any reduction in the gaps remaining would further coalesce the settlements.

Does this parcel, either in part or in its entirety, act as a buffer to the merging/coalescence of 2 or more settlements?

D.43.15 The parcel acts as a buffer between a number of settlements; Lingfield and Dormansland, and Felbridge and Dormans Park.

D.43.16 The parcel cannot really act as a buffer between Felbridge and East Grinstead as they have already merged. However, in the parts where they are separated, the Green Belt prevents them from merging further.

Can you see any neighbouring settlement 'on the ground'? If not, what prevents this? i.e. too far away, visual obstruction from topography, buildings or woodlands, etc.?

D.43.17 Although long distance views are available from Lingfield, it is difficult to see Dormansland due to the tree cover and topography. Felbridge and Dormans Park are too far away to see each other and are also screened by large woodland.

D.43.18 Due to the proximity between Felbridge and East Grinstead you can see the neighbouring settlements from each other. However, there is some tree cover in parts which screens the settlements slightly.

Conclusion on Purpose 2

D.43.19 The parcel separates a number of settlements. However, due to physical features such as the railway line between Lingfield and Dormansland and the woodland between Felbridge and Dormans Park (as well as the distance) there is no risk of them merging.

Purpose 3: to assist in safeguarding the countryside from encroachment

What are the characteristics and features of the area?

D.43.20 The central areas are predominantly woodland and fields, and the countryside south of Lingfield is also particularly open and free from

development, including the Racecourse. There is quite a substantial amount of development at Felcourt although the majority of this is located in the adjacent parcel 043. Although there are a number of large dwellings here most are set back from the road and well screened by hedges and tree cover. From the west they are completely hidden by woodland.

What type of development exists within the area? For example: agricultural buildings, industrial uses, etc.

- D.43.21 The parcel contains some agricultural buildings, Lingfield Racecourse and some residential dwellings.

Does the parcel contain countryside?

- D.43.22 The parcel is generally free from development and contains countryside.

What is the size and scale of the development and/or visual obstructions within the parcel? i.e. woodlands, topography etc.

- D.43.23 The Racecourse contains a substantial amount of built form. However, very special circumstances were established to allow the development in the Green Belt. The rest of Racecourse is open but is also well screened from the western side.

- D.43.24 There are also some isolated dwellings throughout the parcel, but they are fairly small in form and are not of significant concentration to have encroached upon the countryside.

Conclusion on Purpose 3

- D.43.25 There is some development within the parcel. However, the most substantial is the Racecourse; where very special circumstances were established to allow the development in the Green Belt. The rest of the development is scattered and isolated, so as to not have an encroaching appearance on the countryside. The parcel is effective at serving this purpose.

Purpose 4: to preserve the setting and special character of historic towns

Are there any designated historic conservation areas within or visible from the parcel?

- D.43.26 The Lingfield Conservation Area extends out from the inset part of the settlement east into the Green Belt.

How would you describe the view from, within, into and out of the conservation area?

D.43.27 There are views into the settlement and fields that surround the Conservation Area.

How does the parcel complement the setting of the conservation area?

D.43.28 Although most of the developed part of the Conservation Area is surrounded by newer development within the settlement, part of the Conservation Area also includes the fields and some buildings in the Green Belt.

Conclusion on Purpose 4

D.43.29 The Green Belt forms part the setting of area and so it is considered to make a strong contribution to preserving its setting and special character and as such has been identified as an area for further investigation (this area has been identified as 045 on the map in Appendix F).

Conclusion: How effectively does Parcel 042 serve the purposes of the Green Belt?

D.43.30 The parcel plays a critical role in checking urban sprawl from East Grinstead and preventing it expanding northwards, despite the presence of some existing ribbon development. As such, this area has been identified as an area for further investigation (this area is labelled 041 on the map in Appendix F). There is also recreation ground at the end of Talbot Road that blurs the line between town and country and as such has been identified as an area for further investigation (this area is labelled 044 on the map in Appendix F). The parcel is generally effective at safe guarding the countryside from encroachment and where development is present in the Green Belt it is generally small scale and low density. The parcel also plays an important role in maintaining the setting and special character of part of the Lingfield Conservation Area; for this reason has been identified as an area for further investigation (this area is labelled 045 on the map in Appendix F). Whilst the parcel plays a role in maintaining settlements, there are physical barriers between them that would prevent them merging.

Appendix 3: Tandridge Green Belt Assessment (Part 2) (2016) Appendix 2 Extract – (Parcel 045)

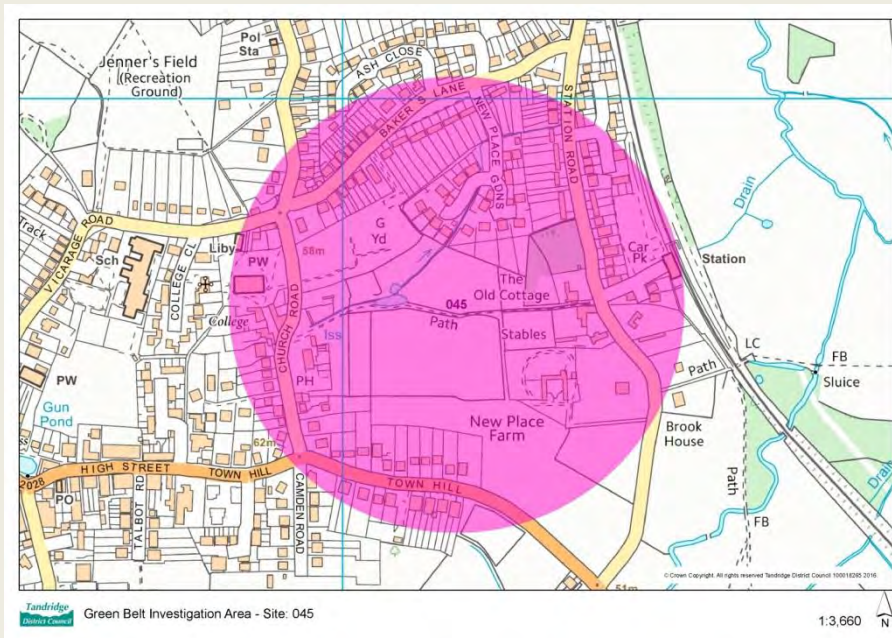
GBA AREA FOR FURTHER INVESTIGATION NO:

045

Description of Area for Further Investigation:

This Area for Further Investigation relates to the eastern end of the Lingfield Conservation Area. It extends from the land opposite the church to Station Road to the east and includes various residential dwellings, with the Green Belt extending to the east of the church and the public house. The development around Church Road fronts onto that road and beyond those buildings is an open space. At the eastern end are further residential dwellings, including farm buildings, which have been converted. The Conservation Area includes a small area which is not within the Green Belt (New Place Gardens), which together with the land to the north abutting the Conservation Area comprises residential dwellings. To the south of the Conservation Area, there are further residential dwellings, which extend part way along Town Hill. Further residential dwellings outside of the Conservation Area face onto its eastern edge, before a transition to open and undeveloped land.

A: Map of Area for Further Investigation



B: Why was this selected as an Area for Further Investigation?

The Green Belt forms part the setting of the Lingfield Conservation Area and so it is considered to make a strong contribution to preserving its setting and special character and as such has been identified as an Area for Further Investigation.

C: Summary of Consultation Comments applicable to Area for Further Investigation

No comments have been received that are applicable to this Area for Further Investigation.

D: Is there built form in the Area for Further Investigation and what is the nature, age and relationship with the setting of the built form?

The Area includes residential dwellings, including converted farm buildings. The majority of the buildings within the Conservation Area, where it is designated as Green Belt, are clearly historic (being 17th and 18th century buildings as set down in their listings). Others are Victorian in appearance.

E: How much undeveloped land lies within the Area for Further Investigation and describe the undeveloped land?

This Area is predominantly undeveloped and comprises fields, some of which have no apparent use, although there are some which appear to be used for grazing of horses.

F: Are there any definitive boundaries within the Area for Further Investigation? Would the boundary prevent sprawl and / or does the boundary contain existing development? Is there opportunity to create a permanent boundary? Please consider this even when the definitive boundary is across the administrative boundary.

If this Area were to be released from the Green Belt, there are public highways which would adequately prevent further sprawl. However the current boundaries comprise the rear boundaries of a number of properties, parts of Church and Station Road as well as tree lines. Based on aerial photographs, in part the Green Belt boundary appears to cut across the rear gardens of properties on New Place Gardens, although it is noted that the Green Belt boundary is aligned with the approved rear boundary of these properties as allowed at appeal under reference TA/97/1019 and permission has not been granted for their use as residential land. It is considered that the boundaries have generally been successful in preventing sprawl.

G: Does the Area for Further Investigation prevent settlements from merging; partially or fully? What would be the implications if this area merged? Consider where this may be two built up areas merging. Does the area provide separation, or could it provide separation?

The Area for Further Investigation encompasses built-form, which falls within the same settlement, with notable built-up areas to the west/south-west and to the north/north-east. This area does not serve to prevent settlements from merging. However, it does serve to prevent built-up areas within the same settlement from merging.

H: What is the current use of the land and how does this relate to the purposes of the Green Belt?

The Area includes a mixture of uses, including residential, which do not relate well to the purposes of including land in the Green Belt. The remaining areas of land comprise fields, with a small part used as a cemetery. Many of the fields do not appear to be in any form of active use, but it is apparent that some are used for grazing, and relate well to the purposes of including land within the Green Belt.

I: Is there a Conservation Area within the Area for Further Investigation? Please set out the details of the Conservation Area; including the size of the Conservation Area, the boundaries, the setting of it within the Green Belt, the reason why it is a Conservation Area. Also provide information and consider any adjacent Conservation Areas.

This Area for Further Investigation relates to the eastern end of the Lingfield Conservation Area. There is no appraisal. However, the character of this Area is clearly open and provides a rural setting for the church and the approach to it, as well as including the historic buildings to the east, some of which formed part of a farm. The Conservation Area also includes land, which is designated as Larger Rural Settlement, including part of New Place Gardens. It is only this eastern end of the Conservation Area, which is located within the Green Belt.

J: Has this area been subject to development pressure? Refer to planning applications / appeals and identify the key Green Belt considerations mentioned in the report.

There is no visual evidence of development pressure and this is supported by the planning application search.

K: In line with paragraph 81 of the National Planning Policy Framework, what opportunities does the Green Belt offer?

This Area includes a public footpath, which cuts through the area, leading from the built-up area. The land is otherwise predominantly privately owned. As such this area provides some public benefits.

L: Using all the above information, what is the final conclusion?

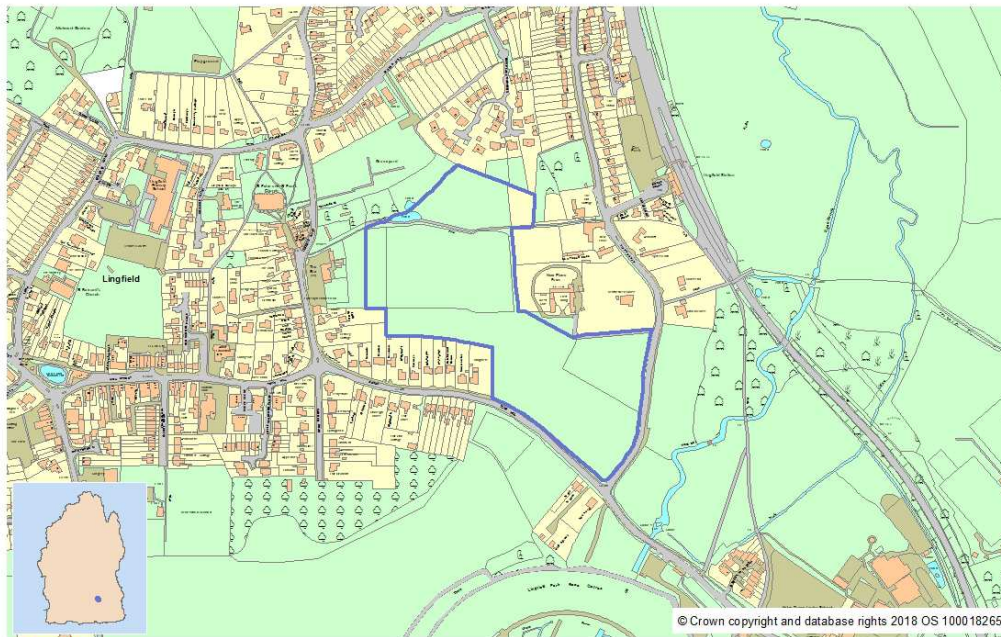
This Area covers the eastern end of the Lingfield Conservation Area. The documentation relating to this Area's designation as Conservation Area does not clearly indicate the reasons for its designation, but it is assumed it relates to the historic layout of the village and the fact that a farm existed on the outer edges of the village, which would be surrounded by open land as a result of its use. The Area for Further Investigation provides a rural setting and approach to the church. It is considered that the siting and scale of the Green Belt in this location serves to prevent sprawl, the merging of built-up areas and encroachment upon the countryside and that this is essential in preserving the setting of this part of the Conservation Area. Whilst built form is visible from within this Area for Further Investigation, overall it is open and makes a notable contribution to the openness of the Green Belt. Additional protection has been considered but it has been concluded that no stronger protection is either necessary or possible. Accordingly, this Area is not recommended to be considered further as part of the Green Belt Assessment.

Appendix 4: Tandridge Green Belt Assessment (Part 3) (2018) Appendix 1 Extract – (Parcel LIN030)

LIN 030 - Land at the Old Cottage, Station Road, Lingfield

LIN 030 Land at the Old Cottage, Station Road, Lingfield

EXTENT & LOCATION OF SITE



Land at the Old Cottage, Station Road, Lingfield

Proposed Development: Residential, 50 units

Spatial Strategy

Is the site strategically compliant?

The site is undervalued land located on the edge of the built-up area of Lingfield, a sustainable settlement designated as Tier 2 in the Council's Settlement Hierarchy and identified as a preferred location for development as part of the spatial strategy. Accordingly, the Council considers that the site is strategically compliant and would have a significant role to play in achieving sustainable patterns of development across the district.

Green Belt Assessment

Does the Green Belt Assessment recommend that the GB in this location should be retained or further considered in terms of exceptional circumstances?

The site has been considered through the Green Belt Assessment Part 1 as part of GBA 042. The Green Belt evidence concludes that the parcel is effective in safeguarding the countryside from encroachment, contributes to preserving the setting and special character of part of the Lingfield Conservation Area, plays a critical role in checking urban sprawl from East Grinstead and preventing it expanding northwards, and plays a role in maintaining settlements. This site was also considered through Part 2, falling with AFI 045, which concludes that this Area provides a rural setting and approach to the church, and that the Green Belt serves to prevent sprawl, the merging of built-up areas and encroachment on the countryside, as well as being essential in preserving the setting of the conservation area. Furthermore, that overall it is of national character. It is not recommended for further consideration.

What is the nature and extent of the harm to the Green Belt if the site is developed?

Development in this location would result in sprawl, the merging of built-up areas, encroachment on the countryside and could fail to preserve the setting of a conservation area. However, whilst the area is generally open, it is also contained by built form and accordingly development is likely to have a limited impact with respect to its encroachment on the countryside, sprawl, merging with other

LIN 030 Land at the Old Cottage, Station Road, Lingfield

		<p>settlements and subject to a robust and defensible boundary being identified, the wider Green Belt. It would also, by infilling this area, make a positive contribution to settlement form.</p>
	<p>To what extent can the consequent impacts on the purposes of the Green Belt be ameliorated or reduced to the lowest reasonably practicable extent?</p>	<p>The impact of development could be reduced through buffers, landscaping and sensitively designed signs, in particular it could be designed such that it conserves the setting of the Lingfield Conservation Area. Further, Town Hill which aligns with the southern site boundary and Station Road marking the eastern site boundary provide robust and defensible boundaries, whilst making a positive contribution to settlement form in this location. As such this would limit the impact on the wider Green Belt's ability to continue to serve its purposes.</p>
<p>Other evidence base considerations</p>		
	<p>Does the ecology indicate consideration of the site is ecologically suitable?</p>	<p>The majority of the site is ecologically suitable and development would need to be within the ecologically suitable parts of the site. The off-site woodlands and orchards to the north and east of the site would require a buffer zone of 10 to 15m, and there is 0.41 woodland within the site which is ecologically unsuitable. The open grasslands are ecologically suitable and a well-planned development can retain or replace the "stepping-stone" corridor value of the field-boundary hedgerows. Therefore development of this site would need to include an unlit buffer for semi-natural woodland, orchard and linear hedgerow/track/scrub habitats and to avoid the loss of irreplaceable habitats, additional land may need to be considered.</p>
	<p>Does the landscape indicate consideration of the site has capacity to accommodate development in the landscape?</p>	<p>With both moderate sensitivity and value, the site is considered to have medium landscape capacity for development. The site is potentially suitable for limited development within the northern part of the site, in association with the existing surrounding development, provided it has regard for the existing character of the area and demonstrates no adverse impacts on the surrounding local landscape or separation to Dormansland. The southern portion of the site begins to protrude into the surrounding landscape, and is a noticeable part of the south-eastern approach to Lingfield providing a rural setting to the village; it is also part of the undeveloped land between Lingfield and Dormansland. Any development would need to be of a form that is closely related to, and in scale with, the existing settlement adjacent to the site, in particular it should be in keeping with the conservation area and preserve views of the church spire from the south-east. However, potential planting could screen the site effectively from the south-east.</p>
	<p>Does the Open Space, Sport and Recreation Facilities Assessment consider that the site is surplus provision or can facilities be provided elsewhere?</p>	<p>Not applicable as the site is not existing open space. However, the population resulting from proposed development on this site would generate additional demands for open space. These would need to be considered against existing provision in the parish and result in policy requirements for on or off-site provision, if the site is allocated.</p>
	<p>Does the Sustainability Appraisal consider that the site is a sustainable location?</p>	<p>It considers that the site can provide sufficient housing, has satisfactory access to a GP surgery, employment opportunities and public transport. The northern half of LIN 030 is within the Lingfield Conservation Area. At present the northern area of the site is an open field, therefore residential development of LIN 030 would be expected to change the nature of the conservation area in this location. Further, development of the site is expected to restrict views of the church from the east. Its development would be expected to preserve and enhance the Lingfield</p>

LIN 030 Land at the Old Cottage, Station Road, Lingfield

	<p>Conservation Area and its setting through design and low density. It is greenfield and its development would be expected to lead to the loss of soil. The site overlaps with the Eden Biodiversity Opportunity Area. Given that the same area of the site is also an area of flood risk, there is the potential to enhance the habitat in this area however it is not known whether this opportunity would be undertaken at this time. The site classified as Grade 3 (good to moderate quality) land under the Agricultural Land Classification system.</p>
<p>Is the site substantially preferred? Would development of this site increase flood risk or impact on water quality?</p>	<p>The majority of the site is within Flood Zone 1, but also contains Flood Zone 2, a low risk of surface water flooding and negligible risk from groundwater flooding. Therefore it is not substantially preferred however a sequential approach within the site would be expected and given the extent of Flood Zone 2 it is considered that mitigation through design and layout would be possible. It would pose negligible inherent risk or benefits to water quality. In order to mitigate the effects, SUDs would be required.</p>
<p>Is the proposed development of the site likely to result in harm that would be difficult to mitigate and/or provide opportunities for community benefits?</p>	<ul style="list-style-type: none"> • Biodiversity enhancement opportunities comprising enhancement of grassland (within orchard and alongside hedgerow network) and woodland and creation of wetland habitats. • Community Infrastructure Levy eligible/potential contributions or on-site provision of infrastructure.

Discussion

Are there exceptional circumstances that would outweigh the harm to the Green Belt and justify Green Belt release?

Having considered (i) the acute needs/intensity of the objectively assessed need for housing, (ii) the inherent constraints on supply/availability of land prima facie suitable for sustainable development and (iii) the consequent difficulties in achieving sustainable development without impinging on the Green Belt (Calverton principles (i) to (iii)) in the main report, as well as the reasonable options set out in the draft NPPF 2018, it is evident that development within the Green Belt is necessary.

In light of the above, housing development on this site would make a contribution of 50 units which would help meet the district's housing need in the short term, consistent with the principles of sustainable development. Furthermore, the site comprises undeveloped land located on the edge of a Tier 2 settlement and as such is in a preferred location on sustainability grounds, being within close proximity to a GP surgery, schools, countryside, employment and public transport. In addition, the site is considered, in principle, suitable for development from a landscape and ecology perspective subject to mitigation measures. Other potential adverse effects such as the impact upon the setting of listed buildings, surface water flooding and groundwater contamination could similarly be adequately mitigated.

The Green Belt in this location serves the Green Belt purposes in terms of safeguarding from encroachment, preventing sprawl, preventing settlements from merging and preserving the Lingfield Conservation Area, and as such its development would impact upon the site's ability to serve these purposes however as the site is physically and visually well contained by built form on the sides, and subject to the use of sensitive design, buffers, landscaping and robust and defensible boundaries, its impact on the wider Green Belt would be limited and its harm to the Green Belt purposes in this location mitigated. Accordingly, development is likely to have a limited impact on openness because it would infill a gap confined by built development and roads in the built-up area. It would 'complete' the settlement form. In addition this site is not within a satisfactory distance from secondary schools; however this is the case for all Lingfield sites.

LIN 030 Land at the Old Cottage, Station Road, Lingfield

It is considered that, subject to appropriate design, development would make a positive contribution to settlement form, whilst providing an opportunity to enhance the Lingfield Conservation Area through townscape design. The development of this site would attract CIL, and as such would contribute towards infrastructure needed to support the growth of the district. In addition this site could provide benefits above and beyond any need to offset impacts associated with its development, contributing to a wide range of community benefits including the opportunity to contribute to the funding of a new DDA compliant footbridge at Lingfield Station, Lingfield Surgery improvements, highway improvements and by providing additional community parking and public open space. In addition the site overlaps with the Biodiversity Opportunity Area and Flood Zone 2, and this site's development could include biodiversity enhancement measures.

Having considered all of the factors set out in section 3 of the paper "Green Belt Assessment Part 3: Exceptional Circumstances and Insetting" it is considered, as a matter of planning judgement, that this site does justify the exceptional circumstances necessary to recommend amendment of the Green Belt boundary.

Is there an alternative boundary that would be suitable, permanent and endure in the long term and serve to meet the exceptional circumstances of this site?

Town Hill aligning the southern site boundary and Station Road marking the eastern site boundary provide robust definable boundaries that are capable of enduring in the long term.