

Lingfield Neighbourhood Plan

Response to TDC Local Plan Sites Consultation (Regulation 18)

1. Introduction and general comments.

1.1. This response to Tandridge District Council (TDC)'s Local Plan: Sites Consultation is submitted by the Steering Group drawing up the Lingfield Neighbourhood Plan (LNP).

1.2. The TDC draft plan (Issues and Approaches) was published in December 2015. The LNP was concerned about a number of aspects of the process adopted for that consultation, in particular about the complexity of the documentation and the difficulty of finding one's way through it and identifying the important sections, particularly for members of the public not used to dealing with such a large number of documents. The LNP were also concerned that the timing of the consultation, over the Christmas and New Year period, regardless of the ten week period, meant that the time available to work through the documents was more limited than it might appear. Overall, the process was unfortunate as it suggested to a number of people in the community that the consultation was aimed at complying with government legislation rather than really trying to get their views. The plan was badly presented, with an excessive number of documents that were poorly written, often contradictory and difficult for residents to understand. These problems have not, in our opinion, been addressed.

1.3. This consultation appears to have similar failings. It is more limited in scope than the previous one and the main document sets out its aims more clearly, however the referencing system is still difficult to follow and the cross-referencing between the main document and the subsidiary ones is quite limited, with the result that some dedication is needed to identify all the issues relating to a site. The size of the documents at more than 3,500 pages is unmanageable, even the time taken to download the online versions is an indication of their dimensions. The statements in the main document do not always appear to reflect fully the points made in the supporting ones. Furthermore, there is still the problem of the consultation extending over the Christmas and New Year period, when many people do not have the time needed to plough through the documents in the detail they deserve.

2. Description of Lingfield Parish.

2.1. Lingfield Parish covers 8.67km² (3.35 square miles) and is located almost in the most south eastern part of Tandridge District and of Surrey. The village of Lingfield is inset from the Green Belt and this is about 10% of the area of the parish. It includes some large open spaces: Jenner's Field Talbot Road Recreation Ground and the school playing field. It has a medieval "Old Town" with many important buildings including a Grade I Listed dwelling house. The introduction of the rail link through Lingfield in the late 1890's brought expansion, which was partly related to the

opening of the racecourse. Local industries were based on the raw materials found in the area, including iron foundries and brickworks, the last of which closed in 1979 (Crowhurst Brickworks). The main use of the land today is for mixed farming.

2.2. The largest single landowner in the parish is Lingfield Park, which has a racecourse, training gallops, golf course, hotel complex and the associated buildings and infrastructure to service the busiest horse racing venue in the country. The second largest holding is Felcourt Farm which is a mixed farm, predominantly dairy, with beef herds and fodder crop production.

2.3. The village sits on a ridge above the low-lying areas which are very prone to flooding and this risk has constrained its growth to the north and east. The village can be completely cut off by flood waters as the surrounding areas are the “flashy head” of the Eden Brook, which has two branches either side of the village. The elevated position of the village, and the predominance of the Grade I Listed church above the skyline with the houses clustered around it, make the views towards the village notable. There are considerable far reaching views outwards across the surrounding countryside, towards the Surrey Hills and North Downs to the north and the High Weald AONB to the south east.



Figure 2.3. View of Lingfield church and village from Dormansland village.

Note the impact of the visual appearance of the village is reduced by the tree cover.

2.4. There are about 4,500 residents in the parish; most live within the village boundary but there are stretches of houses in Felcourt to the south and along part of the Lingfield Common Road to the north.

2.5. The last 20 years has been a sustained period of growth in the village, with 400 additional dwellings, bringing the parish total to 1,820. The LNP have noted the key

concern of residents is that this growth has not been matched by any improvement in the local infrastructure, with a particular concern that the doctor's surgery and primary school are now at capacity and unable to expand due to site constraints. The nearest secondary school (Oxted) is also full and with the increasing pressure on the nearby East Grinstead schools by its own growing demand, the spaces previously taken by Lingfield students will be reduced or removed. The congestion, especially at school times and on race days, is compounded by parking problems on the through routes.

2.6. The employment rate in the parish is above average with 73% aged between 16 and 74 in work (England 68%) although there is a significant number of people over the age of 65 (20% as opposed to the England average of 16%) and 17% of the population have a long term illness. The largest employment sector is retail, then health and social work and third largest is construction. A significant number are in managerial or professional positions (47%) and many of these commute out of the area, mainly by train, to work.

3. The Neighbourhood Plan.

3.1 Lingfield parish was designated as a Neighbourhood Plan area on 18 June 2014. The parish council instructed a Steering Group in September 2014 to produce the plan.

3.2. The LNP have carried out a number of public engagements over the last two years to collect the information needed to ensure the LNP reflects local opinion, and the Steering Group have drawn on the results of these in preparing this response. Two are particularly relevant, and so are described in more detail below.

3.3. The first was a Community Survey carried out in November 2015. A questionnaire was delivered to each of the 1820 households in the village and 472 replies were received, a response rate of about 26%. The main conclusion is that most of the residents enjoy living in Lingfield and would like it to remain much as it is at present. The most appreciated features are its setting in (and strong links with) the countryside, its good rail links to London and its community spirit. There was very considerable concern about the local infrastructure, however, in particular the surgery (too small, poor service), the number and range of shops, traffic congestion and parking. There was strong support for the Green Belt and for other things that contribute to the village's atmosphere and its relationship with the countryside.

3.4. The second was an Open Day in the Lingfield Community Centre on 26th November 2016, with display boards setting out the LNP's key features, sites within the village identified in TDC's HELAA 2016, and currently undeveloped areas near the village, shown in Figure 3.4 with the sites included in TDC's current consultation. Visitors were asked write comments on the boards and to rank the undeveloped areas in the order in which they'd prefer to see them developed (i.e. giving a score of 1 to the area they would least object to being developed and 5 to the area they would most object to). The results are given in Table 3.4.

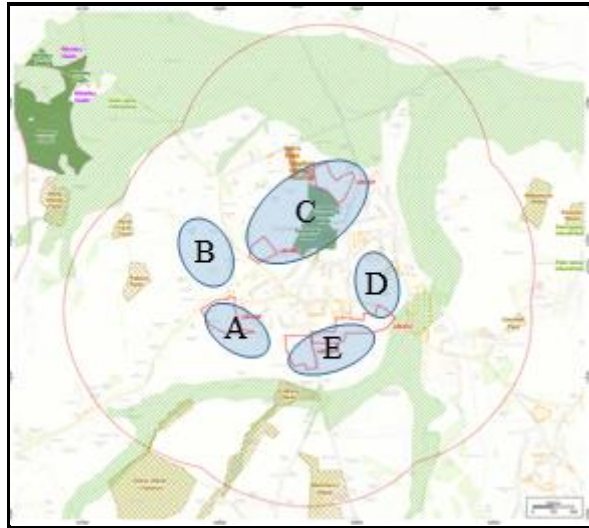


Figure 3.4. Areas around Lingfield currently undeveloped.

Area	Description	Average Score*
A	South of Newchapel Road	1.62
B	West of Godstone Road	1.81
C	Between the village and Lingfield Common Road	4.24
D	Between The Star and the station	4.05
E	Either side of East Grinstead Road	3.52

Table 3.4. Scoring results.

The higher the value, the higher the protection desired.

* The Average Score is the total of the scores given for the area divided by the number of responses

3.5. The results show there is a preference in the community for any development to take place to the west of the village (Areas A and B) rather than to the north, to the east or (to a lesser extent) to the south (Areas C, D and E). It must be noted that the sample size for this particular exercise was small and in general the majority view is that should development be allowed, subject to the appropriate infrastructure, the priority should be for those with local connections to have the housing, which the LNP could be in a position to draw up policies for.

3.6. These and other engagements have provided the Steering Group with evidenced insight into the concerns of the residents and businesses, identifying the key issues the plan will try to address. There are other issues outside of the scope of a Neighbourhood Plan which have been noted and these have helped inform this LNP response.

4. Housing numbers.

4.1. The LNP appreciates that this consultation is about examining sites that might be suitable for development to ensure all relevant issues have been identified and understood, rather than reviewing the current and future need for housing in Tandridge. Nevertheless, the assessment of this need is a critical step in developing the Local Plan, and the LNP is concerned about the number determined in the Objectively Assessed Housing Need (OAN) Technical Paper (2015) and reproduced in the Strategic Housing Market Assessment (2015), for two main reasons:-

- i. The method of arriving at the final number is shrouded in commercial sensitivity, so the figure has to be accepted at face value.
- ii. The factors taken into account are open to criticism. The projected housing number is based on a sustained period of over-delivery in the district due to large sites being abandoned as big businesses and institutions, such as Caterham Barracks and St Lawrence's Hospital, moved out of the area and were replaced with housing. As a result the derived future need projections will have been over-estimated. There are also questions about the factors used to estimate household formation and migration rates.

4.2. If the current OAN figure is adopted without being challenged or reviewed, the LNP is concerned that the housing delivery target would be set too high, which could result in Green Belt sites being released for development inappropriately. The use of Green Belt to meet housing need is not considered the appropriate justification for an exceptional circumstance. All the sites in Lingfield meet at least one of the purposes of the Green Belt and some of them perform very well.

4.3. The LNP has commissioned its own Housing Needs Assessment for Lingfield. The work was undertaken by Surrey Community Action, who concluded that the parish has a housing need of

- 12 affordable social rented units; and
- 12 market rate units.

4.4. The Housing waiting list from TDC has 75 units requiring rehousing. The highest need is for 1 bedroom units (42) and a third of the list are identified as Band D and E, which indicates they either do not have as great a need for alternative housing or earn too much to be entitled to be allocated a social rented property. There are 7 at band A, the most urgent need, all these require 1 bedroom units. The LNP assumes there is some overlap in these statistics but does not rule out they identify discrete numbers. This could make the need for the village as about 50 additional dwellings, although because of the needs, the majority would be single person units.

4.5. The responses to the LNP surveys outlined in Section 1 confirm that the infrastructure in the village is under significant stress (particularly the surgery but also the school. These are also identified in the Duty to Cooperate Statement Update (2016) (p22 and App A, meetings held on 25Aug, 01Sep and 08Sep). The LNP finds that the majority of residents want this deficit to be addressed before any further development takes place. The LNP believes that providing the identified need with the number and type of units could be accepted locally, provided they are allocated

to existing residents. Any larger number of units than this would only be possible if the infrastructure deficit is addressed and it would also need to fit into the landscape, provide a good mix of housing types and access the village in a way that is acceptable to the residents. LNP is looking to attempt to do this.

5. Possible Developments within Lingfield Parish

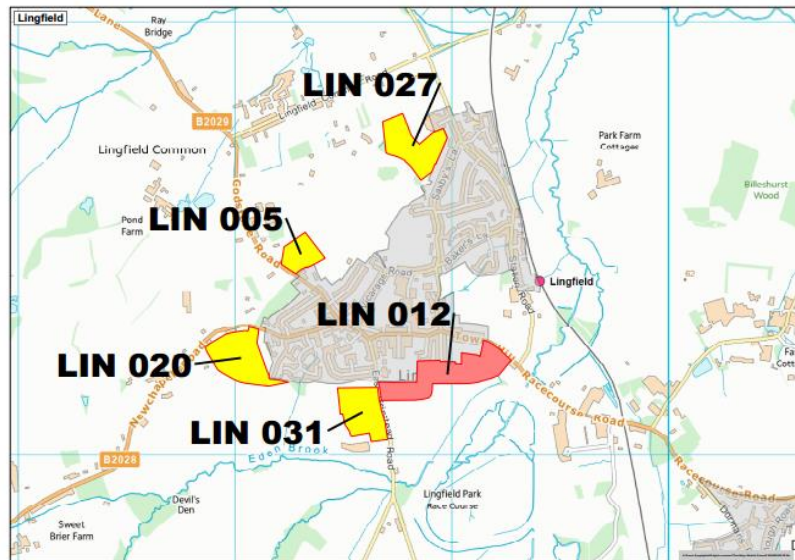


Figure 5. Lingfield sites identified in the Sites Consultation (2016).

Site LIN 005 Field to east of Godstone Road

5.1. Within the last year there has been a public meeting run by a planning consultant, Foxley Tagg, on behalf of the site's owner about using it for rural exception self-build housing. The meeting was attended by a large number of residents, whose overwhelming response was against any development at the site. This is consistent with the response at the recent LNP-run public meeting described in Section 1, which was strongly against any development in Undeveloped Area C (which includes this site).

5.2. The primary objection is on landscape and local importance grounds. The site has a particular value to residents as it is part of an extensive network of public footpaths crossing the open space between the village and Lingfield Common Road. There are far-reaching views to the North Downs across it, and it forms part of the visual gateway entering and leaving the village as there is a clear edge to the village, with any houses set back from the view or behind trees.

5.3. Its importance is recognized in the Green Belt Assessment Part 2 (2016) Appendix 2, which notes that 'there are three listed buildings (The Old House, The Thatched Cottage and Porters Hall) that mark the entrance to Lingfield, to the north, and are on the settlement boundary of the Green Belt' (p115). On the next page it states 'Development creep on the east side of Godstone Road (beyond Wallis Garden Machinery site) into the Green Belt is to be particularly resisted as it poses a

bulge beyond the village boundary and takes it precious close to what was common land.'

5.4. This is not the impression of the site provided in the Sites Consultation document. It only acknowledges the sites' 'low/medium capacity to accommodate development in the wider landscape' (p229) and only refers to the setting of just one listed property that would need consideration; It does not acknowledge the importance of the high level of sensitivity and by only recording one listed building, the score for the setting value is low. There are three Grade II listed buildings within close proximity, one of which is Grade II*. The "value" total is also reduced by not recognising the three footpaths which almost surround the site (only one is noted) and its proximity to the Lingfield Nature Reserve which is accessed by these paths is not recorded. By scoring low on these matters, the Sites Consultation document indicates the site is suitable for development. Even with the 15 units suggested, the assessment fails to take into account that planting screening trees would ruin one of the best views out of the village to the north.

5.5. Other objections are on the grounds of access, which would be compromised by the presence of the recently installed pinch points, and surface water drainage, since care would be needed to avoid affecting properties in Lingfield Common Road which already flood regularly. The houses on the southern edge of the field are also prone to flooding and the boundary ditch is where their foul water overflows from their septic tanks.

Site LIN 012 Land between Town Hill and East Grinstead Road

5.6. Although this site has been ruled out on landscape capacity/sensitivity and ecology grounds, it remains in the list of 'Deliverable and Developable' sites in the HELAA Appendix 3, hence the inclusion in this response.

5.7. The LNP confirms that it is unsuitable, partly because of its historic value as the only remnants of the extensive apple orchards that once surrounded Lingfield and partly because the access from either East Grinstead Road or Town Hill would be difficult. However the impact development here would have a damaging impact on the landscape in general and the extensive views both from the village towards the High Weald AONB and the wooded slopes of Dormansland and inwards from these places and from the racecourse.

5.8. It is in Undeveloped Area E (Fig. 3.4), which is where residents would prefer development **does not take place**, as described in Section 3.5. As in the other site put forward by Lingfield Park (LIN 020), there is historic use of the open land for access by residents for informal recreation, mainly dog walking, from both Lingfield and Dormansland with the tacit knowledge of the owners and this has been a common practice for at least the last 50 years.

Site LIN 020 Land adjacent Newchapel Road.

5.9. This site is in Undeveloped Area A (Fig 3.4), which is one of the areas where the residents would prefer any development to take place, as described in section 3.5. There were some comments however, against any release of Green Belt land

including this site, because of its open aspect and that it forms a good boundary “edge” to the village. It serves the purpose of visual separation from the string of Victorian properties further along the Newchapel Road.

5.10. Nevertheless there are some issues that would need to be considered if it was developed, in particular the access to it from Newchapel Road. This road, which has several bends, gets very busy during the morning and evening rush hours and is subject to speeding traffic at other times, so the access arrangements would need to incorporate appropriate safety measures.

5.11. Drainage could also be a problem, although adoption of appropriate Sustainable Urban Drainage Systems (SUDS) arrangements should overcome this. The stream at the bottom of the slope drains into a flood risk area.

5.12. The need to retain the existing open views from and through the site, to avoid affecting views from East Grinstead Road and methods to improve and sustain the local ecology would also need to be considered. This would require a lower density of housing and a height restriction to allow views to be retained.

Site LIN 027 Land behind Saxby’s Lane.

5.13. This site is in Undeveloped Area C (Fig. 3.4), which is one of two areas where the residents would be **strongly against any** development taking place, as described in Section 3.5. The main reasons for this are the desire to retain the area between the village and Lingfield Common Road as open space, to avoid anything that would affect the people using it and the enjoyment they get from the views to and from the area, and to retain the link between the village and the surrounding countryside that this site affords.

5.14. There are other significant objections, however, in particular the difficulty of access. There is no obvious access point from an adjacent road to the site. The current owners’ access is an agricultural right of way of an adjoining property they happen to rent. Saxby’s Lane is a residential road, largely built in the 1940s when motor cars were uncommon. As a result most of the houses do not have allocated off road parking and the subsequent on street parking makes this road very congested. Parking on the verges, including at the road junctions is already a problem for road safety.

5.15. The potential impact on the local ecology is a major concern. The site adjoins the protected areas of the Lingfield Nature Reserve and Tom’s Field/Lingfield Orchid Meadow. Any development on any part of this site will impact on the designated areas. Apart from the increased pressure on the open space by the additional residents (and their dogs), development on either of the fields will break the well established green corridor which stretches from the Godstone Road in the west to the Bio Diversity Opportunity area to the east. This corridor includes the Lingfield Nature Reserve and the associated public open space of the Centenary Fields, Community Orchard and Jenner’s Field recreation ground. The ecological sensitivity already identified in the Site Based Ecological Assessments for this site extends to these public open areas which are maintained by volunteers in order to protect and encourage native species for the benefit of the residents. The LNP is aware the

gardens adjacent to the site have ponds which host Great Crested Newts, which will use this site for foraging. Lingfield is particularly lucky to have healthy populations of these, mainly because of the protection afforded by this belt of undeveloped land between the village and Lingfield Common Road in which the Lingfield Nature Reserve is located.

5.16. The reports indicate the site is in flood zone 1 and not at risk from surface water flooding. This does not reflect the actual nature of the site. It is often fully saturated, being at a low point locally and in heavy rainfall events holds surface water which floods into the adjacent gardens. The whole site is below the 50m Ordnance datum and the edge is within 20 metres of the Flood Zone 3. Development on any portion of this site would be unsustainable when the climate change criteria are considered and that there is nowhere to put any surface run-off from the development with a SUDS because of the highly vulnerable nature of the functional flood plain in very close vicinity.

5.17. The suggested yield in the Sites Consultation of 72 units makes no allowance for the reduction suggested in the ecology report. LNP recommends this site is removed from further consideration primarily because of its unsuitability on ecology and flood risk grounds but also because the site has no viable access.

Site LIN 031 Lingfield House and Grounds

5.18. This site is within the area (E, Section 3.5) which residents indicated they did not want any development. The setting of the large Victorian house and the visual gateway into the village would be adversely affected. Whilst the house is not listed, it is within its historical context on a prime location outside the edge of the village. The separation is enhanced by an access strip to the racecourse land between Lingfield Housed and Drivers Mead. This is an informal access for residents to walk across to the Newchapel Road.

5.19. The access to the site will be a specific problem, with the busy East Grinstead Road passing through a cutting as it bends down the slope to Jacksbridge. This part of the road is often wet with run-off from the fields, busy and despite narrowing to a bridge, the traffic is very fast for the conditions. It is a local accident hot spot and has been the site of frequent accidents involving serious injuries and fatalities over the last 20 years.

5.20. Should development be considered on this site if the above problems could be addressed, a further consideration should be the openness of the site from the village to the north and north east. Whilst not officially a right of way, residents have enjoyed the open nature of the adjacent site for recreation, which is enhanced by the clear views to the High Weald AONB.

Site LIN 030 Land to the rear of Old Cottage, Station Road

5.21. Whilst it is noted this site is in the HELAA Appendix 4 as it is deemed "unsuitable", the LNP would like to reiterate its unsuitability for any development. It is split by a very heavily used public right of way (FP 381a) which links the village to

the station and Station Road. The open space so close to the village heart is highly valued by residents and it provides views from the oldest part of the village (Church Road) to the countryside and the views into the village at this point are close to what they would have been for the last 300 years. The cluster of listed buildings around the church include a Grade I listed dwelling and it is very unusual for a modest domestic heritage asset to be close to the original boundary of the village. There are other heritage assets to the east of the site, the only stone house in the village, New Place and its walls are listed, and Old Cottage itself.

5.22. The whole site is within the conservation area because of its importance in providing the original setting for the high number of heritage assets, and as such all the trees in the area are protected by this status. There are however Tree protection Orders specifically on the trees in this site. They are protected to ensure the setting was maintained as the site was previously owned by a housebuilding company. Any access to the site would have to either involve the removal of these trees or the demolition of Old Cottage, neither of which would be acceptable. Station Road is a busy cut through and the official route for race-course traffic away from the village centre.

5.23. A further problem is the low lying nature of the site, prone to holding standing water and its role in providing drainage from Church Road. Flood mitigation would have to be considered. The little stream on the site often breaches its banks. Even if the site was not protected in the conservation area, it would cause harm to so many aspects, it would not be deliverable. LNP are considering identifying this whole site as a Local Green Space because of its very high value to the residential amenity to the whole village.

General Comments about the sites in Lingfield

5.24. It is noted the scoring system, whilst not ideal because of its subjective nature, euphemistically referred to as “professional judgement”, is based on secondary evidence alone and the statement that it was completed without the Ecology and Landscape reports (Sustainability Appraisal 2016, p3) doesn't inspire confidence in its accuracy. The LNP is in a better position, working with and living within the community to have knowledge of the situation regarding each site. One aspect of Lingfield the LNP is aware of is the local economy. The commercial centre is struggling, with a large number of vacant retail units and convenience and food shops are generally being replaced by services such as dog grooming, restaurants and coffee shops. This does generate some local employment opportunities, as do the larger businesses, in particular the racecourse, the schools, including Young Epilepsy nearby, the elderly care establishments and the restaurants. Therefore the majority of local jobs are in the lower end of the pay scales. These types of jobs will not be able to provide sufficient incomes for anyone buying any new houses on the Green Belt sites around Lingfield. There is the rural exception scheme to build a limited number of affordable homes for people with a local connection on Green Belt land, which has already been used to satisfy some of the local demand. The LNP cannot see the release of these Green Belt sites are justified by employment opportunities locally. The economy in Tandridge generally is shrinking so the

economic case for housebuilding for local employment is not valid. The only people who will be able to afford to buy these Green Belt houses, will be commuters, probably working in central London. This is not a sustainable option and the appraisal should have taken this into account. Every single site should have scored worst on economy; indeed that should be the score for every residential site in the district.

5.25. As all of the sites in Lingfield are green field sites, the LNP would have thought the very adverse effects of building on it would make the score for 'previously developed land' lower. None of the green field sites score worse than the 'pink' grade. The LNP is concerned that the Green Belt sites are being considered at this stage when the document they are presented in makes no reference to the importance of Local Plans having to comply with the policies of the NPPF. The broad statement that "should exceptional circumstances be determined and the site allocated", fails to give due weight to the requirement set out in the NPPF that sustainable development and housing delivery has to take into account the constraints of the policies within it (NPPF, paras 14 & 47). Green Belt is one of those constraints.

6. Major development proposals near to Lingfield.

6.1. The sites consultation document identifies the possibility that stand alone large scale development, either in the form of a new settlement or urban extension could be a method to deliver a significant portion of housing numbers supplied with their own infrastructure requirements. This is a method larger planning authorities are considering and may have their merits if the sustainability issues are addressed satisfactorily.

6.2. LNP do not believe Tandridge is a suitable district for the consideration of any such scheme. The sustainability of any site falls down on the following general criteria even before the harm to the Green Belt or other harms are considered.

- Economy. Tandridge does not offer a credible case for any economic growth
- Transport infrastructure. Both the road and rail links out of the district are at capacity and the possibility of any improvement is unlikely given the physical and capacity constraints that will prevent significant improvement.
- House prices. Whilst not a planning reason in itself, commuters working in higher paid jobs in London will always outbid locals for any new housing, so the housing will be bought by workers who will have to travel out of the district for employment and any workers in the district who cannot afford to buy here will have to travel in to work. This is unsustainable, especially where the use of cars will predominate as the railways are either full or not working properly.
- Infrastructure deficit. TDC has consistently over-delivered housing without any significant inputs from the service providers so Doctor's, schools, etc are running very close to or at capacity.
- Environment. Flooding is a serious issue over most of the district and in the south the clayey soils drain poorly and are prone to flashy flooding. The

proposed sites are in the drainage basin of the River Eden and both areas have flood risk to a degree and a very high risk of making flooding worse elsewhere unless extensive mitigation is put in place. This will add cost to the development, possibly making it unviable.

- Loss of a large tract of Green Belt – the harm to the Green Belt will not be outweighed by the notional gain in housing numbers, particularly as the significant unsustainability issues would make the schemes unacceptable.
- Other harms – to the local ecology or historic assets, drainage, light pollution, additions to congestion, visual amenity and loss of farmland

6.3. As far as the village of Lingfield is concerned, the possibility of a new settlement nearby, is very undesirable. The village services are not coping well with the current pressures and any additional increase during the period of development will cause serious problems. The primary school and surgery are constrained by their sites from further expansion.

6.4. Both of the proposed settlements would need to access railway stations. The Godstone line is less favoured by London commuters and for any residents at Blindley Heath, Lingfield would be the most likely station to use. The South Godstone site may prefer to drive to Hurst Green for the London service. The current passenger numbers for Lingfield is about 2,500 passengers in and out every day. Congestion in the village by commuters coming in from other areas, including from outside of the district, already creates a serious parking issue. However for both lines, the limit to the increase in the number or length of the trains will be the capacity of the junctions to process the trains. Both lines go through East Croydon which does not have much more capacity to increase the throughput of trains. For Lingfield it will mean commuters parking earlier to get spaces on the trains extending the length of the “rush hour”.

6.5. The roads in Lingfield village have already been noted by the LNP as an issue for residents and whilst largely out of the LNP’s ability to address the congestion, any new settlement, especially when it is growing and relying on other places for infrastructure provision, will add more traffic into Lingfield. It is already the route for HGVs into the south end of Edenbridge from the A25/M25 because of a low bridge, it serves as a rat run for commuters and businesses to avoid the Felbridge congestion on the A22 in East Grinstead and it has the district’s number one employer (Young Epilepsy) as well as a large private school (Notre Dame) which generates huge numbers of cars going through Lingfield. Add to this the race traffic on the busiest racecourse in the country, it is understandable that any additional traffic as a result of new settlements is likely to drive through the village for some purpose and add to the problem.

6.6. Another knock-on consequence to adding a new settlement in the south of the district is increased flows of surface and foul water. The sewage treatment works at Lingfield serves Blindley Heath. Because of the low lying nature of the area, the foul waste does not drain away easily and backflows from the sewage works occur regularly in Lingfield and Blindley Heath. Any increased run-off from a new settlement at either of the locations will drain into the Eden Brook which is the source

of the river flooding in Lingfield. There are some flood defences but these are to channel the flood water into holding areas rather than allowing it to go down stream into Edenbridge. The wider impacts of drainage will need to be included in the further evaluation of the sites, if all the other issues can be addressed.

Post script.

The late inclusion of the Redhill Aerodrome proposals at this point in time is not helpful, as it is a distraction. It may serve to deflect opinion for a new settlement to there without ensuring the settlement proposals for Blindley Heath or South Godstone are ruled out properly on planning grounds. The LNP will reserve comment about this site when it comes forward for consultation.