

Draft Lingfield Neighbourhood Plan (Reg 14) – Analysis of proposed site policies LNP 1 – LNP 4

Lingfield House (LNP 1)

The site has been the subject of a recent planning application (ref. 2022/548) for the following development:

“The conversion of Lingfield House and development of the site to provide an integrated retirement community (Use Class C2) comprising up to 128 independent living apartments and cottages together with associated communal facilities and consulting rooms, landscaping, amenity space provision and parking including a new reconfigured access from East Grinstead Road and footway improvement works”.

The application was due to go to planning committee on 30th November 2022 but was withdrawn just prior to the meeting by the applicant. However, an officer’s report was published which gave the officer’s recommendation to the committee for refusal, citing a total of nine reasons:

- 1. The proposal would be inappropriate development within the Green Belt for which Very Special Circumstances (VSC) have not been demonstrated to clearly outweigh this, and other identified harm*
- 2. Detached from the built-up area of Lingfield Village and is not effective in integrating into its surroundings, as such the impact would be negative with regards to contribution to GB openness and open countryside.*
- 3. Harm to the character of the area which is open countryside would arise due the overall scale, massing and layout of the development.*
- 4. Unsustainable form of development in conflict with the NPPF resulting in a reliance of the private car.*
- 5. Insufficient details have been provided to assess any proposed footways connection from the northern site access along the verge of East Grinstead Road and the impact construction of the footway on the Corsican Pine.*
- 6. Insufficient details with regards to construction access into the site and whether this would result in the increased visibility of the development.*
- 7. Unacceptable levels of noise from Gatwick airport and flightpath*
- 8. Insufficient provision for the infrastructure contributions required to offset the impacts of the future residents upon local infrastructure.*
- 9. Unsustainable location of the site and lack of reliable and regular public transport.*

The officer’s assessment within the detailed report (paragraph 35) finds that the site is an unsustainable location which would be contrary to the borough-wide spatial strategy and wider sustainability objectives of national planning policy:

35. *It is concluded that the proposal fails to develop a scheme that adheres to the Council's Policy approach to direct development to defined settlements. In this case, it would be a Category 2 Settlement which should address the needs of rural communities. Furthermore, by virtue of the type of development being proposed, the proposed development is considered to be likely to encourage reliance on the private car over more sustainable transport modes such as walking and cycling, and the use of public transport. The redevelopment of the site would therefore be unsuitably located and would be unsustainable contrary to Policy CSP1 of the Core Strategy 2008 and contrary to the sustainability objectives of the NPPF 2021.*

It is highlighted that the site does not abut the settlement boundary, with an undeveloped strip of land approx. 30 metres wide separating the site from the existing settlement. As such, the assessment finds that the site is "not a suitable location as it is contrary to the cohesiveness of the settlement form and boundary".

This supports the Council's assessment during its emerging Local Plan process, in which the site was not taken forward for allocation during the Regulation 19 consultation on the grounds that the location away from the village was not considered appropriate for an extension to the existing settlement or release from the Green Belt.

Green Belt

Previous assessment of the site's development capability raised concerns in relation to impact on the Green Belt, stating that it would likely lead to "urban sprawl" and would be "unacceptable intrusion to the open countryside to the detriment of the village".

Highways/ transport

Surrey CC Highways consultee response to the withdrawn planning application notes that impacts of the development of the site could be mitigated via appropriate planning conditions and s106/ s278 agreement.

Environmental

It is noted that the site lies under a flightpath for Gatwick Runway 26L and is therefore subject to significant and constant noise intrusion.

Heritage

The site is adjacent to Lingfield Conservation Area and several Grade I and II listed buildings which may constraint development. It is also noted that Lingfield House is a Victorian property

and although it is not listed it has local significance in the context of its siting at the southern entrance to the village.

Conclusion on LNP 1

The proposed policy supports the site for a development which is identical in terms of the proposed use and quantum of accommodation to that submitted under recent planning application ref. 2022/548. While that application was ultimately withdrawn by the applicant, there was a clear recommendation to planning committee to refuse the proposed development, on a total of nine grounds including fundamental objections to the unsustainable location of the site and harm to the openness of the Green Belt and the character of the open countryside.

It is clear that these objections are fundamental and are highly unlikely to be overcome by an alternative design or layout. Thus, the policy as proposed would appear to be contrary to previous detailed assessments of the site by the LPA, which find it not to be an unsustainable location for development and find the proposal to develop the site to be in conflict with the strategic policies contained within the development plan, including Policy CSP 1. As such, it is not considered that the policy would meet the “basic conditions” set out in Paragraph 8(2) of Schedule 4B of the Town and Country Planning Act 1990 (as amended).

Garth Farm, Godstone Road (LNP 2)

Site LNP 2 was submitted to TDC’s HELAA in 2015. However, the 2017-18 HELAA listed the site as unavailable, understood to be due to a lack of confirmation from the landowner. As a result, a detailed assessment of the site’s suitability for development was not undertaken through the emerging Local Plan process, although it was assessed in the AECOM 2020 report.

Green Belt

According to the AECOM assessment, “the site is adjacent to the existing built-up area and is considered to have a low landscape sensitivity to development as a result of existing mature planting surrounding the site”.

However, the development of the site would result in an extension of the village towards Lingfield Common to the north and would evidently result in a coalescence, contrary to Green Belt purposes a), b), and c). It is therefore inappropriate development and result in “in-principle” harm to the Green Belt.

Highways/ transport

Access to the site could be achieved via Godstone Road.

Environmental

The AECOM assessment notes that the site contains a TPO is adjacent to several other TPOs. These may constrain the developable area of the site.

The site has been used in the past for the unauthorised burning of waste. As such the land could be contaminated. This may undermine the viability and deliverability of the site.

Heritage

There is a group of Grade II and Grade II* buildings to the southeast on Godstone Road. Development of the site need to have regard for the setting of these buildings.

Conclusion on LNP 2

It is not considered that the site assessment by AECOM clearly demonstrates that site LNP 2 is suitable and deliverable. There are concerns regarding urban sprawl and the coalescence of Lingfield and Lingfield Common, given the relatively small gap between the settlements and the likelihood that other sites may be susceptible to future development, notably the site opposite Godstone Road, which has previously been submitted as part of the emerging Local Plan process (site ref. LIN 005). As such, it is not clear that there would be exceptional circumstances to justify development of the site.

Additionally, the environmental, heritage, and (particularly) ground contamination constraints undermine the deliverability of the site, while it remains unclear whether the site is immediately available for development given that it was listed as unavailable in the 2017-18 HELAA.

Land to the Southwest of Lingfield (LNP 3)

Site LNP 3 was assessed as part of TDC's HELAA in 2017-18. It was not taken forward as a site allocation in the draft Local Plan (Reg 19), based on the conclusions of the subsequent Green Belt Assessment Part 3 (2018) (hereafter "GBA").

Green Belt

TDC's GBA notes that the site "plays a critical role in checking urban sprawl from East Grinstead by preventing settlements from merging".

It further notes that the site provides limited screening to mitigate impact on views into the open countryside and that "no robust and defensible boundaries have been identified, which would be necessary to limit its impact on the wider Green Belt."

The site occupies a prominent position at the top of a slope, resulting in "substantial landscape sensitivity". As such, the GBA notes that even sensitive design would not sufficiently mitigate

the impact of development of the site to Green Belt openness and the purposes of the Green Belt.

The GBA concludes that “having considered all of the factors... it is considered, as a matter of planning judgement, that this site does not justify the exceptional circumstances necessary to recommend amendment of the Green Belt boundary.”

Highways/ transport

it is understood that the site could be accessed from Newchapel Road.

Environmental

There are no known environmental constraints to development.

Heritage

There is a Grade II* listed building opposite the site which would need to be considered through the development management process.

Conclusion on LNP 3

It is clear from TDC's GBA as summarised above that there are significant concerns regarding the impact of the development of LNP 3 on the openness and purposes of the Green Belt. The assessment clearly states that “exceptional circumstances” would not exist and therefore the release of the site from the Green Belt would be contrary to paragraphs 140 to 143 of the NPPF.

The AECOM assessment acknowledges that the site would be “a large urban extension to the west of Lingfield in the context of Lingfield's current size”. In light of the concerns regarding sprawl and coalescence, it is evident that site LNP 3 is not a suitable site for development and would result in unacceptable Green Belt harm.

Pitts Barn, Newchapel Road (LNP 4)

Site LNP 4 was submitted by the landowner and agent directly to the LNP. As such, there has been no prior assessment of the site's suitability for development as part of the emerging Local Plan process or associated evidence base. There is an assessment of the site in the AECOM report.

Notwithstanding this, it is clear that the site is not a suitable location for a new residential development. The site is approx. 0.6 miles from the existing settlement, only accessible via Newchapel Road which is a busy thoroughfare with a very narrow footway. Potential occupiers

would be heavily dependent on the use of a private car. This is supported by the findings of the AECOM assessment, which states that “the site is not in close proximity to local amenities or services and would result in an unsustainable form of development”, concluding that “the site is not considered suitable for allocation”.

The LNP references an appeal decision at Rowlands Farm, Newchapel Road (APP/M3645/W/18/3216522) as evidence of the sustainable location of the site. However, the appeal decision in question is for the erection of 2 buildings for use as holiday lets. A holiday let is materially different from a permanent dwelling in terms of its pattern of use and trip generation. As such, it may be considered acceptable for a relatively inaccessible site to provide a holiday let, whereas it may not be considered able to support a new permanent dwellinghouse. Furthermore, the proposal for 2 holiday lets is materially different in scale from the indicative 40no dwellings that would be provided according to the proposed policy. The appeal decision relates to a different use and scale of development and therefore is not considered to establish that the location would be suitable for the residential use proposed under LNP 4.

It is clear that a new residential development of up to 40 homes would be an unsustainable form of development and contrary to local and national planning policy aims.

Green Belt

Although the impact of the site on the Green Belt has not been assessed in detail as part of TDC’s Green Belt assessment, it is evident that the development of a large site in the open countryside would have a significant impact on openness and conflict with the purposes of including land within the Green Belt.

Additionally, Part 1 of the Green Belt Assessment (2015) provides a broad assessment of the parcel of land to the south of Lingfield in relation to the Green Belt purposes. This notes that “the parcel plays a critical role in checking urban sprawl from East Grinstead and preventing it expanding northwards”.

Highways/ transport

The AECOM assessment notes that “the site does not have an existing access to the public highway, this would need to be provided through the landowner’s property to the north of the site.”

Environmental

The site is partially with Flood Zone 2 and adjacent to Flood Zone 3. As such, any development would need to be justified by a flood risk assessment and sequential test.

Heritage

It is noted that there are two Grade II listed buildings are located to the north of the site. These may provide a constraint to development of the site.

Conclusion on LNP 4

It is clear that site LNP 4 is not a suitable or sustainable location for residential development. This is confirmed by the assessment of the site within the AECOM report, which recommends that the site is not allocated. It is unclear why the site has therefore been included within the draft LNP.

Sites LNP 1 – LNP 4



Figure 1 Map showing location of draft Lingfield Neighbourhood Plan (Reg 14) site policies

The map above shows the location of the draft site policies LNP 1 – LNP 4 and LPN 5 (Star Fields). As can be seen, the development of all of the proposed sites LNP – LNP 4 would result in a proliferation of built form to the west of the existing settlement. This would clearly result in impacts to the purposes of the Green Belt and openness which exceed that of any individual site as discussed above.

In particular, the proliferation of development would undermine the western edge of the settlement, which is currently well-defined. In doing so, it would make adjacent parcels of land more susceptible to future development, likely resulting in even greater sprawl to the western half of Lingfield and further reducing the gap between Lingfield and adjacent settlements, including East Grinstead. For this reason, it is considered that the proposed site policies would

be contrary to the spatial strategy for Tandridge and national planning policies to protect the Green Belt and open countryside from sprawl and encroachment.

In contrast, LNP 5, would form a “natural extension” to the existing settlement – in effect infilling the gap to its southeastern edge – and would provide a clearly defined boundary to the village. This would protect the Green Belt from future sprawl and support the purposes of the Green Belt, given the pressures on the district’s land for housing. For this reason, it is considered that LNP 5 is a suitable site for development that would accord with the spatial strategy for Tandridge and should be a preferred option for the LNP.