

OUR REF: WF/AE/R00056

Planning Department
Tandridge District Council
Council Offices
8 Station Road East
Oxted
RH8 0BT

11 November 2022

Dear Tandridge Planning

LETTER ACCOMPANYING THE SUBMISSION OF ADDITIONAL INFORMATION IN SUPPORT OF PLANNING APPLICATION REF. 2022/685 LAND AT THE OLD COTTAGE, STATION ROAD, LINGFIELD, RH7 6PG

This Cover Letter has been prepared on behalf of Woolbro Group and Morris Investment (“the Applicant”), to accompany the submission of additional information in support of planning application ref. 2022/685 at Land at the Old Cottage, Station Road, Lingfield. The planning application seeks outline permission for the residential redevelopment of the above site.

This letter outlines the additional information which is submitted to the LPA and details how this supports the assessment of the proposals in relation to relevant planning policy and comments received from statutory consultees and the LPA. The additional information comprises:-

- Site Sections (drawing no. 2661-A-1010-PR revA).

Background

Planning application ref. 2022/685 was validated by Tandridge District Council on 20th June 2022. The application seeks outline planning permission for the following development, as per the LPA’s amended description of development:

Outline application with all matters reserved except for access and layout for a residential development of 99 dwellings (40% affordable) with associated access, formal open space, landscaping, car & cycle parking and refuse. (The application site is located within Lingfield Conservation Area and affects the setting of Listed Buildings and Structures).

Since the validation of the planning application and subsequent consultation period, several comments have been made by statutory consultees in response to the proposals. These are summarised in the following table:-

02-Aug-22	Surrey Highways	CC	Objection	Requests additional information - however, has not reviewed May 2022 Highways Technical Note which covers these points.
11-Aug-22	Surrey Heritage	CC	Objection (subject planning balance) to	The development will harm views of the CA and from behind The Star Inn; loss of views of Grade I church and rural setting; slate-roof oast houses inappropriate within local context. Harm to be considered as part of planning balance.
26-Aug-22	Surrey Wildlife Trust		Objection	Prior to determination, must provide: - Updated protected species survey results; - Demonstrate feasibility for BNG. Other requests for various conditions relating to landscape and ecological management.
29-Sep-22	Parish Council		Objection	Green Belt and Conservation Area. Surrounded by listed buildings. Overwhelming community objection. The site is not being included in the emerging Neighbourhood Plan.

Table 1 Summary of statutory consultee responses

With regards to the objections by Surrey CC Highways and the Surrey Wildlife Trust (SWT), it is highlighted that these comments are made without having reviewed the additional information provided to the LPA following the validation of the application. For clarity, these documents are:-

- Biodiversity Net Gain Feasibility Assessment, LUC, July 2022
- (Revised) Landscape Strategy Plan, June 2022
- Biodiversity Metric 3.1 Calculations
- (Revised) Ecological Appraisal, LUC, October 2022
- Highways Technical Note, Motion, 12 May 2022
- Stage 1 Road Safety Audit v1.0, Gateway TSP, 20 April 2022
- Utility Report, Integration UK, 23 June 2022

These documents were issued to the LPA on 15th July, 19th August, and 4th November.

The above documents are considered to address the requests for additional information from Surrey CC Highways and the SWT. For example, the highways response notes that traffic surveys/junction analysis and a Stage 1 Safety Audit should be submitted; in fact, these are provided by way of the above listed documents. In addition, the request in the SWT response for further detail regarding the potential for the development to deliver a biodiversity net gain (BNG) is addressed by the feasibility assessment, revised landscape strategy plan, and the BNG

calculations as provided to the LPA in August. Updated protected species surveys have been carried out since the submission of the application and are detailed within the revised Ecological Appraisal by LUC, in accordance with the SWT's recommendations. Thus, it is considered that these consultee comments have been appropriately addressed.

While the comments made by the Parish Council are noted, it is reiterated that detailed justification for the proposed development has been made in relation to the impacts to the Green Belt and surrounding heritage assets. These impacts are mitigated through the design, scale, and layout of the proposed development. Furthermore, the public benefits of the proposals should be given substantial weight, particularly in light of the delivery of housing including affordable housing and the LPA's inability to demonstrate a five-year housing supply of land. In the absence of specific requests for additional information made by the Parish Council, it is considered that the information already submitted with the application and the additional section drawings enclosed sufficiently address the Parish Council's comments.

Surrey CC Heritage comments

The comments from Surrey CC Heritage relate to the impact of the proposed development on surrounding heritage assets including the Lingfield Conservation Area, The Church of St Peter and St Paul (Grade 1 listed building), and various other statutory and locally listed buildings within Lingfield. The detailed comments are summarised as follows:-

- The development will harm views of the Conservation Area from New Place to Church Town.
- It will harm views from Station Road and will be visible behind The Starr Inn along Church Road.
- The proposed slate roof building would be an inappropriate backdrop to this part of the Conservation Area.
- The development will lead to the loss of views of the Grade I Church of St Peter and St Paul and the loss of the fields which give it a rural setting.
- The two slate roof "oast house" buildings would challenge the prominence of the church tower.
- There would be a loss of views of the locally listed oast house at New Place Farm from Station Road.
- The garages shown on the illustrative street scenes do not relate well to the proposed buildings or wider streetscene.
- Concerns regarding specific materials such as brick garages and oast house slate roofs.
- Heritage benefits from the provision of public space within the Conservation Area which will allow some limited views of the Grade I Church of St Peter and St Paul.

Additional information is enclosed with this submission to address some of the concerns raised by the heritage officer. This comprises **a series of sections through the Site** which more

precisely demonstrate the scale of the proposed development and its relationship to surrounding buildings, including the heritage assets mentioned in the heritage officer's detailed response. The section drawings clearly show that the two-storey scale of the proposed development would sit comfortably in the context of existing built form in Lingfield. The ridge heights of the proposed buildings are in all cases substantially lower than that of the Grade I Church of St Peter and St Paul to the north-west of the Site, both as a result of (a) the modest scale of the proposed buildings and (b) the ground levels which slope up towards the church. As such, the proposed development would have an extremely limited impact to the prominence of the listed building and would allow views to the church spire through the Site including the central pathway which is retained.

It is considered that the submitted section drawings provide strong additional justification for the appropriateness of the proposed development in the context of surrounding heritage assets and the existing settlement of Lingfield. They provide further clarity as to the precise scale of the proposed development and contextualise this in relation to natural ground levels, which are beneficial in terms of the principal heritage impacts identified by the heritage officer.

With regards to some of the other comments in the heritage officer's response, such as those regarding the more detailed design features such as the garages and materiality of specific buildings, it is highlighted that this application seeks outline permission only with matters including appearance, scale, and landscaping being reserved. Thus, while these comments are duly noted, it is reiterated that the indicated details are illustrative only at this stage and will be subject to a subsequent reserved matters application, at which point additional details and justification in town planning terms will be submitted for the consideration of the LPA and statutory consultees. As a result, it is respectfully suggested that these comments should not warrant a reason to refuse outline planning permission.

Furthermore, it is clear from the above comments that the heritage officer does not consider that the heritage impacts of the proposed development should necessarily direct refusal, but rather that they represent a degree of harm which must be balanced against the benefits of the scheme. This is evident from the following statement, taken from the Heritage Officer consultation response:

the above will all need to be taken into account as part of an overall planning balance to assess the benefits of providing housing in the district. I am of the opinion that the impact on the aforementioned heritage assets could be used as a reason for refusing the application should the proposal not balance favourably" (emphasis added)

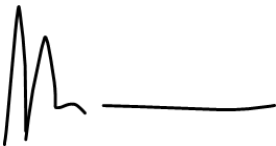
As has been detailed elsewhere in the application, the public benefits of the proposed development are substantive and should be given a great deal of weight in the planning balance. It is the applicant's view that, cumulatively, these far outweigh the limited harm identified by the heritage officer.

Conclusion

Overall, it is considered that the additional information enclosed and the above justification sufficiently addresses the heritage officers comments and provides further weight to the applicant's argument that any limited heritage harm arising from the proposed development is clearly and demonstratively outweighed by the public benefits of the scheme, in accordance with the test set out in paragraph 202 of the NPPF. Thus, the proposed development is considered to be wholly in accordance with relevant local and national planning policy and should be supported by the LPA.

I trust that you have all the information you require to proceed with the determination of this application. If, in the interim, you have any queries please do not hesitate to contact either myself or Wilf Foster (wilf.foster@rokplanning.co.uk). I look forward to you confirmation of receipt of this letter and any further comments or questions you may have.

Yours faithfully,



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