



Oakleigh House,  
Town Hill,  
Lingfield,  
RH7 6AG

Tandridge District Council,  
8 Station Road East,  
Oxted,  
RH8 0BT.

31st August 2018

Dear Sirs,

**Tandridge District Local Plan (“TDLP”) – Star Fields (HGS 12) Site Allocation**

I am writing on behalf of the RH7 History Group, based in Lingfield. We wish to lodge our objections to the proposed development which has been allocated in Lingfield in the Tandridge District Local Plan (“TDC”). It is shown in “Our Local Plan 2033 on page 119” as HSG12 and was previously called LIN030 and Land Behind Old Cottage in other documents. I will refer to it below as Star Fields.

Our objections are due to a failure of legal compliance and soundness.

**1. TDC’s failure to consult at a formative stage and lack of transparency (legal compliance)**

In previous consultations, TDC described this site as “unsuitable”. Subsequently developers put the site forward in a submission in December 2016, showing the whole site as available and deliverable. TDC failed to advise or consult with the residents of Lingfield, the Parish Council, district councillors or the Neighbourhood Plan Steering Group when the decision to include the site was made. TDC were aware of the work of the Lingfield Neighbourhood Plan in looking at sites around the village and of their view that the Star Fields were unsuitable. TDC were also aware that the Neighbourhood Plan group had provided evidence that there was less opposition in the village to broad locations for development around the western and southern sides of the village, subject to appropriate designs.

The inclusion of the Star Fields site was kept secret until the first publication of the draft documents in Mid-June 2018 meaning the Council have clearly failed to engage with any of the stakeholders or provided us with an opportunity to submit our views on it.

## **2. Lack of flexibility and reasonable alternatives not considered (legal compliance)**

Other sites were put forward in the green belt around Lingfield and these were presented as possibilities in the Sites Consultation (Nov-Dec 2016). TDC arranged further investigation of these sites in 2017, which very marginally concluded that the sites were unsuitable. However, TDC again did not communicate this information to stakeholders. The Neighbourhood Plan group asked for two of these alternatives to be considered **instead** of the Star Fields when they met the planning officers at the end of June this year, shortly before the final version of the draft plan was approved by the Council in July, which is when it was discovered that the sites had been ruled unsuitable.

The exclusion of these alternative site was kept secret until the first publication of the draft documents in Mid-June 2018 meaning the Council have clearly failed to engage with any of the stakeholders or provided us with an opportunity to submit our views on it.

## **3. Inaccurate, contradictory and misleading evidence (soundness)**

When the site was ruled out for the Sites Consultation in Nov/Dec 2016, its position in relation to the setting of the Conservation Area was given considerable weight. This resulted in it being described in these documents as “unsuitable”.

A more detailed investigation of the site’s position in the green belt parcel assessments, stated that it 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.**” (Green Belt Assessment (Part 2) Areas for further investigation 2016, Appendix A, pages 147 & 149)

The description of the site’s position in “Our Local Plan 2033” omits the previous documents’ findings. It states that the site 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 and a Grade II\* listed building sits to the east.” (TDLP page 119).

This description is misleading. The Star Fields links the 17th century Grade II\* New Place with Lingfield Old Town, in which there are **11 listed buildings**; both Grade I and Grade II\*, which makes this cluster of heritage assets significant. The site is no ordinary agricultural field **but an important setting for this medieval heritage area providing open views across to New Place** and the value this affords to this

unique setting explains why Star Fields form a large portion of the Lingfield Conservation Area which protect this setting.

A TDLP justification for removing the Star Fields site from the Green Belt is that it is physically and visually well contained **by built form on three sides**. This is to meet their own statement in the plan that releasing Green Belt in semi-rural settlements like Lingfield will be permitted only where it comprises: "Infilling within an existing substantially developed frontage."

This is manifestly inaccurate and untrue. The site is in fact surrounded by mature back gardens, the lower church graveyard, hedges and mature trees, agricultural land not in the site, a small orchard and the Listed Grade II\* wall to the garden of New Place.

#### **4. Insufficient weight has been given to the importance of the Heritage Assets (legal compliance and soundness).**

The Sustainability Appraisal for Lingfield shows that sites were rejected for reasons including the "close proximity to Conservation Area and may affect setting of Listed buildings", yet the Star Fields site is stated as having "west half within a Conservation Area and a Grade II\* Listed building sits to the east". The close proximity of two Grade I Listed buildings and all the other Listed Heritage Assets are not mentioned at all. This is deliberately down-playing the importance of the Heritage Assets, especially the Grade I and Grade II\* buildings which are of **National Importance**.

A public footpath running beside a site and the access is through a Biodiversity Opportunity Area counts towards rejection, yet the Star Fields is bisected by a well-used public footpath. It includes a Nationally recognised Biodiversity Opportunity Area in the southern portion (not acknowledged in the documents) and the site-based ecology report (2017) identifies 15% of the site as ecologically unsuitable for development. The land on another site is rejected on lesser ecology grounds than for the Star Fields, which is further evidence of unreasonable bias.

The assessment does not give the Heritage Assets adjacent to Star Fields sufficient weight with regards to setting. The National Planning Policy Framework (2012, para 132) states that "great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be" and includes as significant harm, "development **within its setting**". Grade I Listed buildings are assets of national importance and in the case of Pollard House and Cottage, which as a modest domestic building, is of sufficient historic value to be classed in the same group as stately houses and palaces, its proximity of the open fields adds to the setting of the Lingfield Old Town.

#### **5. Exceptional Circumstances to release green belt are not met (legal compliance and soundness).**

Having found that the area serves the purposes of the green belt in previous assessments, especially as it is one of the few locations within the green belt of Tandridge which meets one of the 5 purposes of the green belt: to preserve the setting and special character of historic towns (National Planning Policy

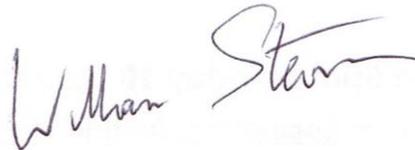
Framework, 2012 and 2018), very little weight is given to this purpose in the green belt exception test.

The assessment is flawed as it repeats the assertion that the Star Fields are “physically and visually well contained by built form on three sides” which as has been already stated, is not true.

The TDC exception test assessment states that the site would have limited impact on the openness of the green belt as it would infill a gap thereby completing the settlement form, which is illogical. The ‘openness’ of the green belt is not specific to a location. Its ‘openness’ is measured on its openness and permanence. This green belt site has not been encroached upon and the boundaries have been maintained intact, mainly because they are already partly ‘open’ as gardens, graveyard, fields and wooded areas.

Joining the gaps on a map to ‘complete’ the boundary is not a sound planning reason to release the green belt. Indeed, if developed, it will join the already developed areas between Lingfield and Dormansland. The Racecourse, Franklin Gardens and Lingfield College have built form up to the railway line to the east. That the railway line is a physical barrier to prevent Lingfield and Dormansland merging is not enough reason to allow this green belt to be encroached upon. Its value to separate the settlements has been reduced by the Council because of the physical barrier of the railway line but the Council fails to assign importance of inclusion of the Star Fields in restricting the sprawl of Lingfield towards Dormansland and also towards the setting of New Place and New Place Farm, with its Oast House, recognised by Tandridge as locally listed Heritage Assets, ‘Buildings of Character’.

Yours sincerely,

A handwritten signature in blue ink that reads "William Stevenson". The signature is written in a cursive, flowing style.

William Stevenson  
Chairman