

Application: 2024/236
Location: Pavilion, Godstone Road Playing Field, Godstone Road, Lingfield, Surrey, RH7 6JG
Proposal: Installation of drainage system to village sports ground.
Ward: Lingfield and Crowhurst

Constraints – ASAC, Gas medium pressure pipeline within 12.5m, Gatwick bird strike zone, Gatwick safeguarding 90m, Green belt area, TDC_legal land terrier 9/28, Road_local b - Godstone road, Risk of flooding from surface water – 30, 100, 1000, Special protection area(s)

RECOMMENDATION: **Grant subject to conditions**

1. The application is presented to the Planning Committee due to the application site comprising Tandridge District Council owned land.

Summary

2. Planning permission is sought for the installation of a drainage system to the existing village sports ground to make it fit for purpose.
3. The proposal would not be inappropriate development within the Green Belt as it would meet the exceptions Paragraph 155 (b) of the NPPF. The proposal would be acceptable with regards to character and appearance, residential amenity and ecology. The applicant has committed to achieving no changes to the final outfall pipe with surface water discharge rates not increasing as a result of the development. Conditions have been recommended which would achieve a suitable SUDS scheme to meet the requirements of Policy DP21.

Site Description

4. The site is located within the Green Belt area of Lingfield and comprises a sports ground together with a pavilion located adjacent to the southern boundary. The site is accessed via Godstone Road. A parking area is located by the entrance.

Relevant History and Key Issues

5. The relevant planning history for the site is as follows:
 - GOR/9340 - Re-erection & re-siting of pavilion Approved 11/03/1949.
 - GOR/1439 - Construction of vehicular access to playing field Approved 25/05/1954.
 - GOR/61/71 - Erection of sports pavilion Approved 16/02/1971.
 - 77/544 - Extension to sports pavilion Approved with Conditions 23/09/1977.
 - 79/995 - Erection of 6 floodlights Approved with Conditions 05/02/1980.
 - 80/444 - Erection of canopy to sports pavilion and erection of sports equipment storeroom Approved (full) 03/07/1980.

- 82/56 - Change of use of waste ground to playing fields Approved (full) 06/04/1982.
- 83/482 - Erection of a 2-metre-high fence fronting Godstone road Approved (full) 05/07/1983
- 85/868 - Erection of double garage for use as equipment store Approved (full) 23/10/1985
- 2000/1047 - Removal of existing covered stand. formation of curved roof over existing flat roof of pavilion providing covered viewing area with disabled access in to pavilion. Subject To Full Council 21/11/2000
- 2002/1336 - Retention of container for storage of sports equipment. Approved (full) 04/12/2002
- 2002/1018 - Erection of 4 x 9.5m high columns supporting flood lights and construction of concrete/gravel paths to improve pedestrian access to land to the west. Refuse 09/01/2003
- 2002/1337 - Change of use of land for recreational purposes providing 2 full size football pitches & four mini-pitches. Approved (full) 19/11/2002
- 2006/22 - Erection of two artificial cricket nets in one enclosed structure incorporating the laying of synthetic grass over prepared sub-base. Approved (full) 13/02/2006
- 2005/705 - Extension of existing car park. Approved (full) 10/08/2005
- 2010/957 - Erection of replacement shed. Approved (full) 14/09/2010
- 2011/40 - Erection of grandstand. Approved (full) 04/04/2011

6. The key issues for this application are:

- the principle of development within the Green Belt,
- acceptability in terms of character and appearance,
- impact on neighbouring amenity
- impact on surface water

Proposal

7. Planning permission is sought for the installation of a drainage system. This involves;

- Installation of 276 linear metres of 150mm pipes
- Installation of 6342 linear metres of 80mm pipes set at 4m centres across the site
- Installation of 22,617 linear metres of secondary drainage consisting of 40mm wide, 200mm deep sand bands at 1m spacing.
- Formation of 76m ditch

Development Plan Policy

8. Tandridge District Core Strategy 2008 – Policies CSP1, CSP17, CSP18

9. Tandridge Local Plan: Part 2 – Detailed Policies 2014 – Policies DP1, DP7, DP10, DP13, DP21
10. Woldingham Neighbourhood Plan 2016 – Not applicable
11. Limsfield Neighbourhood Plan 2019 – Not applicable
12. Caterham, Chaldon and Whyteleafe Neighbourhood Plan 2021 – Not applicable
13. Tatsfield Neighbourhood Plan (Regulation 16)- Not applicable

Supplementary Planning Documents (SPDs), Supplementary Planning Guidance (SPGs) and non-statutory guidance

14. Tandridge Parking Standards SPD (2012)
15. Tandridge Trees and Soft Landscaping SPD (2017)
16. Surrey Design Guide (2002)

National Advice

17. National Planning Policy Framework (NPPF) (2023)
18. National Planning Practice Guidance (NPPG)
19. National Design Guide (2019)

Statutory Consultation Responses

20. Lingfield Parish Council – No objection
21. Environment Agency- No comment
22. Local Lead Flood Authority- Objection : The proposed surface water drainage scheme does not meet the requirements set out in the NPPF, its accompanying PPG and the Non- Statutory Technical Standards for sustainable drainage systems.
23. We are not satisfied that the proposed drainage scheme meets the requirements; however, in the event that planning permission be granted by the Local Planning Authority, suitably worded conditions should be applied to ensure that the SuDS Scheme is properly implemented and maintained throughout the lifetime of the development. Conditions suggested.
24. Southern Gas Network- No comments received.
25. Sports England-Objection: we consider there is insufficient information to demonstrate that any of the exceptions to our Playing Fields Policy are met or that it accords with paragraph 103 of the National Planning Policy Framework (NPPF).
26. Surrey Wildlife Trust- No comments provided.

Third Party Comments

27. Neighbour Letters and Site Notice- No representations received at the of publication.

The consultation period for the application runs until 10th April on expiry of the press notice. Members will be updated with any subsequent comments since the publication of this report.

Assessment

Status of Local Plan

28. The Tandridge Development Plan is formed of Tandridge District Core Strategy 2008, Tandridge Local Plan Part 2: Detailed Policies 2014-2029, Caterham, Chaldon & Whyteleafe Neighbourhood Plan 2021, Limpsfield Neighbourhood Plan 2019 and Woldingham Neighbourhood Plan 2016, as well as the Surrey Waste and Minerals Plans. Section 70(2) of the Town and Country Planning Act 1990 and section 38(6) of the Planning and Compulsory Purchase Act 2004 require decisions to be taken in accordance with the Development Plan, unless there are material considerations that indicate otherwise.
29. The NPPF is a material consideration in planning decisions and its Policies have to be taken into account in dealing with applications from the day of its publication. It is important to note that even though the adopted Development Plan predates the publication of the most recent NPPF, the majority of Policies remain up to date. Policies will be given due weight in accordance with their degree of consistency with the NPPF (December 2023, paragraph 225).

Green Belt

30. The NPPF 2023 supports the protection of Green Belts and the restriction of development within these designated areas. Paragraph 142 of the NPPF states that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open, the essential characteristics of the Green Belt being its openness and permanence.
31. Paragraph 155 of the NPPF advises that certain other forms of development are also not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it. This includes b) engineering operations.
32. Advice in the NPPG states that assessing the impact of a proposal on the openness of the Green Belt, where it is relevant to do so, requires a judgement based on the circumstances of the case. These include, but are not limited to:
- openness is capable of having both spatial and visual aspects – in other words, the visual impact of the proposal may be relevant, as could its volume;
 - the duration of the development, and its irremediability – taking into account any provisions to return land to its original state or to an equivalent (or improved) state of openness; and
 - the degree of activity likely to be generated, such as traffic generation.
33. Policy DP10 of the Local Plan reflects paragraphs 152-156 of the NPPF in setting out that inappropriate development in the Green Belt is, by definition, harmful and that substantial weight must be attributed to this harm. Permission should only be

granted where very special circumstances can be demonstrated to clearly outweigh the harm by reason of inappropriateness and any other harm identified.

34. Policy DP13 states that unless very special circumstances can be clearly demonstrated, the Council will regard the construction of new buildings as inappropriate in the Green Belt. Policy DP13 sets out the exceptions to this, one of which (Part B) is the provision of appropriate facilities for outdoor sport and recreation and for cemeteries, as long as it preserves the openness of the Green Belt and does not conflict with the purposes of including land within it. Also relevant to note is (Part I) which includes any other form of development as listed under paragraph 90 of the NPPF (2012) [*Since superseded by Paragraph 155 of the NPPF 2023*]
35. The proposal seeks to install a drainage system to the village sports ground. Whilst the works proposed would be used to benefit the drainage of the sports pitches and therefore could be considered facilities for outdoor sport the proposal is solely ground works and therefore it is most appropriate in this case to consider the works as engineering operations. The NPPF considers engineering operations to be an exception to inappropriate development within the Green Belt provided the works preserve its openness and do not conflict with the purposes of including land within the Green Belt.
36. The works proposed seek to install a primary and secondary drainage system to the existing sports pitches. This will consist of engineering works to install a linear drainage pipework in a west-east orientation and secondary drainage sand bands in a north-south orientation to create a lattice works of drainage channels across the ground. A 150mm pipe is to be installed along the northern boundary of the sports ground and a new 76m long ditch to the southern boundary, both leading into the existing drainage ditch to the western extent of the site. These works, bar the proposed ditch, would be buried once complete with the sports pitches overseeded to restore the grass following the works. With the majority of the works below ground level ;the proposal would not result in any visual harm to openness nor would there be any perceived spatial harm. The proposal seeks to facilitate the existing use of the site and would not conflict with the purposes of the Green Belt. Taking the above into account, it is considered that the proposal would preserve openness meeting the exception under Paragraph 155 (b) and therefore also meeting the exception under Policy DP13 (I). The proposal is therefore not inappropriate within the Green Belt according with the requirements of Policy DP13 I and Paragraph 155 (b) of the NPPF.

Character and Appearance

37. Paragraph 135 of the NPPF advises that planning Policies and decisions should ensure that developments will function well and add to the overall quality of the area, are sympathetic to local character and history, establish or maintain a strong sense of place and create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users. Paragraph 139 states that development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design.
38. Policy CSP18 of the Core Strategy requires that new development should be of a high standard of design that must reflect and respect the character, setting and local context, including those features that contribute to local distinctiveness.

Development must also have regard to the topography of the site, important trees or groups of trees and other important features that need to be retained.

39. Policy DP7 of the Local Plan Part 2: Detailed Policies requires development to, inter alia, respect and contribute to the distinctive character, appearance and amenity of the area in which it is located, have a complementary building design and not result in overdevelopment or unacceptable intensification by reason of scale, form, bulk, height, spacing, density and design.
40. As discussed above the proposal is to install linear drainage pipework in a west-east orientation and secondary drainage sand bands in a north-south orientation to create a lattice works of drainage channels across the ground. A 150mm pipe is to be installed along the northern boundary of the sports ground and a new 76m long ditch to the southern boundary, both leading into the existing drainage ditch to the western extent of the site. These works, bar the proposed ditch, would be buried once complete with the sports pitches overseeded to restore the grass following the works. Whilst there would be a change in appearance in the short term there would be no long-term character impacts arising from this proposal once the overseeding is established. The proposed ditch would not be overly prominent from views outside the site and would not result in harm to the character and appearance of the site.
41. It is therefore considered that the proposed development would be acceptable in terms of character and appearance and would therefore comply with the provisions of Policies DP7 of the Tandridge Local Plan: Part 2 - Detailed Policies and Policy CSP18 of the Core Strategy.

Ecology

42. Policy CSP17 of the Core Strategy requires development proposals to protect biodiversity and provide for the maintenance, enhancement, restoration and, if possible, expansion of biodiversity, by aiming to restore or create suitable semi-natural habitats and ecological networks to sustain wildlife in accordance with the aims of the Surrey Biodiversity Action Plan.
43. Policy DP19 sets out that there will be a presumption in favour of development proposals which seek to:
 1. Protect, enhance or increase the provision of, and access to the network of multi-functional Green Infrastructure (GI);
 2. Promote nature conservation and management;
 3. Restore or create Priority Habitats; or
 4. Maximise opportunities for geological conservation.It also sets out that planning permission for development directly or indirectly affecting protected or Priority species will only be permitted where it can be demonstrated that the species involved will not be harmed or appropriate mitigation measures can be put in place.
44. The application site does not lie within an area of specific ecological designation and the open recreational use of the playing fields would limit its ecological and biodiversity value. The application site is not accompanied by any ecological appraisal and therefore there is no professional assessment submitted to identify potential habitats for protected species. However, there remains potential for the proposal to have an impact on ecology at the boundary or adjacent to the site. It would therefore be reasonable in this case to require a preliminary ecological appraisal to be undertaken prior to the commencement of works.

Drainage

45. Local Plan Policy DP21 states that proposals should seek to secure opportunities to reduce both the cause and impact of flooding; for example through the use of Green Infrastructure for flood storage and, where necessary, the incorporation of Sustainable Drainage Systems (SuDS) suitable to the scale and type of the development, ensuring the discharge of surface run off is restricted to that of the pre-development site. Consideration should be given as to the future maintenance of any proposed SuDS schemes.
46. The proposed development seeks to install a drainage system to the existing sports pitches to assist the drainage of the ground. The proposal will therefore improve the drainage of the application site however the more efficient drainage of the land could result in an increase flood risk beyond the application site. Any development would therefore need to demonstrate that such flows can be adequately controlled on site.
47. The application as submitted does not provide any technical details with regards to the drainage system nor the runoff rate from the site. As a result the LLFA and Sports England have raised objection due to insufficient details having been provided. However, the LLFA have indicated that in the event that the Local Planning Authority are minded to grant planning permission suitably worded conditions should be applied to ensure that the SuDS Scheme is properly implemented and maintained. Two conditions have been suggested, the first of which secures the details of the drainage scheme, the second to provide verification that drainage is installed in accordance with the approved details.
48. The applicant, through discussion with officers, have confirmed the following:
 - No changes are proposed to the final outfall pipe
 - Surface water discharge rates will not increase.
 - As part of the works, it will ensure any other boundary ditches/watercourses are well maintained and free flowing.
49. It is acknowledged that the application has not been supported with the technical details of the drainage scheme to be installed nor any calculations to demonstrate that discharge rates will not increase from the application site. This has prompted the LLFA and Sports England to object to the application in its current format. However the principal of the proposal which will result in the provision of new drainage system for the site is not objected to. Additionally the LLFA are content that planning permission can be granted, subject to the conditions they have recommended to secure adequate details. The conditions will need to be discharged prior to the commencement of works with a further condition prohibiting use of the site until the works have been verified.
50. In light of the above and with the conditions imposed as suggested above the development will be able to achieve compliance with Local Plan Policy DP21

Sports Provision

51. The proposed development seeks to install a drainage system to the existing sports ground. Sports England within their representation have objected to the application considering there is insufficient information to demonstrate that any of

the exceptions to our Playing Fields Policy are met or that it accords with paragraph 103 of the National Planning Policy Framework (NPPF). The representation provided by Sports England outlines that they have sought advice from the (English Cricket Board (ECB) and the Football Association (FA). Both have identified that insufficient details have been provided with regards to design of the drainage system.

52. Paragraph 103 of the NPPF requires that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
- c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.
 - all or any part of a playing field, or
 - land which has been used as a playing field and remains undeveloped, or
 - land allocated for use as a playing field unless, in the judgement of Sport England, the development as a whole meets with one or more of five specific exceptions.

The development proposed would not see the loss of the playing pitches as is the goal of Paragraph 103 of the NPPF to safeguard, however will result in changes to it which could impact on its usability. The comments from Sports England (and that of the ECB and FA) are therefore concerned that without sufficient details of the drainage it could compromise the use of the playing fields. As discussed above the applicant will be required to submit details of the drainage system prior to commencement of works. Such details would therefore ensure any drainage system installed would provide acceptable drainage of the pitches ensuring they remain usable. The securing of such details would therefore also seek to overcome the main concerns raised by Sports England within their objection.

Equality Duty

53. The Council has a responsibility to promote equality of opportunity, eliminate unlawful discrimination and promote good relations between people who share protected characteristics under the Equality Act 2010 and those who do not. The Case Officer has reviewed the proposed development and documentation and considers that the proposal is not likely to have any direct equality impacts.

Conclusion

54. The proposal would be not inappropriate development within the Green Belt, as it would meet the exceptions under Paragraph 155 (b) of the NPPF. The proposal would be acceptable with regards to character and appearance, residential amenity and ecology. The applicant has committed to achieving no changes to the final outfall pipe with surface water discharge rates not increasing as a result

of the development. Conditions have been recommended which would achieve a suitable SUDS scheme to be meet the requirements of Policy DP21. An acceptable drainage scheme would also secure the continued use of the playing pitches to overcome the objection raised by Sports England.

55. The recommendation is made in light of the National Planning Policy Framework (NPPF) and the Government's Planning Practice Guidance (PPG). It is considered that in respect of the assessment of this application significant weight has been given to Policies within the Council's Core Strategy 2008 and the Tandridge Local Plan: Part 2 – Detailed Policies 2014 in accordance with the NPPF 2023. Due regard as a material consideration has been given to the NPPF and PPG in reaching this recommendation.

RECOMMENDATION:

Grant subject to conditions

1. The development hereby permitted shall start not later than the expiration of 3 years from the date of this permission.

Reason: To comply with Section 91 of the Town and Country Planning Act 1990 as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.

2. This decision refers to Location Plan and 820.01 Rev A received 29th February 2024. The development shall be carried out in accordance with these approved drawings. There shall be no variations from these approved drawings.

Reason: To ensure that the scheme proceeds as set out in the planning application and therefore remains in accordance with the Development Plan.

3. Prior to the commencement of works a preliminary ecological appraisal shall be undertaken for the proposed development. Any mitigation or recommendations with that report shall be submitted to the Local Planning Authority for approval. Thereafter the development shall be undertaken in full accordance with those details.

Reason: To ensure the development does not cause undue harm to ecology in accordance with Policy CSP17 of the Core Strategy and Policy DP19 of the Local Plan Part 2: Detailed Policies.

4. The development hereby permitted shall not commence until details of the design of a surface water drainage scheme have been submitted to and approved in writing by the planning authority. The design must satisfy the SuDS Hierarchy and be compliant with the national Non- Statutory Technical Standards for SuDS, NPPF and Ministerial Statement on SuDS. The required drainage details shall include:

- a) Evidence that the proposed final solution will effectively manage the 1 in 30 (+20% allowance for climate change) & 1 in 100 (+25% allowance for climate change) storm events, during all stages of the development. Associated discharge rates and storage volumes shall be provided using a maximum discharge rate equivalent to the predevelopment Greenfield run-off including multifunctional sustainable drainage systems.

b) Details of the receiving watercourse including downstream connectivity, condition and capacity.

c) Detailed drainage design drawings and calculations to include: a finalised drainage layout detailing the location of drainage elements, pipe diameters, levels, and long and cross 3 sections of each element including details of any flow restrictions and maintenance/risk reducing features (silt traps, inspection chambers etc.).

d) A plan showing exceedance flows (i.e. during rainfall greater than design events or during blockage) and how property on and off site will be protected from increased flood risk.

e) Details of drainage management responsibilities and maintenance regimes for the drainage system.

Reason: To ensure the design meets the national Non-Statutory Technical Standards for SuDS and the final drainage design does not increase flood risk on or off site.

5. Prior to the first use of the development, a verification report carried out by a qualified drainage engineer must be submitted to and approved by the Local Planning Authority. This must demonstrate that the surface water drainage system has been constructed as per the agreed scheme (or detail any minor variations), provide the details of any management company and state the national grid reference of any key drainage elements (surface water attenuation devices/areas, flow restriction devices and outfalls), and confirm any defects have been rectified.

Reason: To ensure the Drainage System is designed to the National Non-Statutory Technical Standards for SuDS.

Informative

1. Condition 2 refers to the drawings hereby approved. Non-material amendments can be made under the provisions of Section 96A of the Town and Country Planning Act 1990 and you should contact the case officer to discuss whether a proposed amendment is likely to be non-material. Minor material amendments will require an application to vary condition 2 of this permission. Such an application would be made under the provisions of Section 73 of the Town and Country Planning Act 1990. Major material amendments will require a new planning application. You should discuss whether your material amendment is minor or major with the case officer. Fees may be payable for non-material and material amendment requests. Details of the current fee can be found on the Council's web site.

The development has been assessed against Tandridge District Core Strategy 2008 – Policies CSP1, CSP17, CSP18, Tandridge Local Plan: Part 2 – Detailed Policies 2014 – Policies DP1, DP7, DP10, DP13, DP21 and material considerations, including third party representations. It has been concluded that the development, subject to the conditions imposed, would accord with the Development Plan and there are no other material considerations to justify a refusal of permission.

The Local Planning Authority has acted in a positive and proactive way in determining this application, as required by the NPPF (2023), and has assessed the proposal against all material considerations including the presumption in favour of sustainable development and that which improves the economic, social and environmental conditions of the area, planning policies and guidance and representations received.