

ITEM 5.1

Application: 2022/548

Location: Lingfield House, East Grinstead Road, Lingfield, Surrey, RH7 6ES

Proposal: 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 and reconfigured access from East Grinstead Road and footway improvement works

Ward: Lingfield and Crowhurst

Constraints: Constraints – Area of Special Advertising Consent; Ancient woodland(s) within 500m; Gatwick Bird Strike Zone; Gatwick Safeguarding (90m); Green Belt area; Gatwick Noise Exposure Contours: 57-60 (dBA); Parish: Lingfield; C-Classified Road: East Grinstead Road; Risk of Flooding from Surface Water – 1 in 1000 years; Special Protection Area.

RECOMMENDATION: REFUSE

1. This application is reported to Committee following a Member request for a 'call-in'

Summary

2. The proposal would result in inappropriate development within the Green Belt for which very special circumstances have not been demonstrated to clearly outweigh this, and other identified, harm.
3. Insufficient provision has been made in respect of infrastructure while the proposal would be sited outside of a settlement and would result in unsustainable development and a reliance on use of the private car.
4. Harm to the character of the area which is open countryside would arise due to the overall scale, massing and layout of the development.
5. As a result of the nature and quantum of these concerns it is recommended that planning permission is refused for the reasons set out at the end of this report.

Site Description

6. The application site lies to the south of the rural settlement of Lingfield (but does not adjoin it) in the south-east of the District. The site sits wholly within Green Belt land. At present there is no defined walking access from the site to the settlement of Lingfield.
7. The existing site is roughly rectangular measuring 4 hectares (ha) in area. The longest edge of the site (eastern edge) faces onto East Grinstead Road, from where access and egress is maintained.
8. The site is in residential use (Use Class C3 of the Use Classes Order) and contains a large single family dwellinghouse. The existing building dates from the late-Victorian era, it is multifaceted with a number of gables and the height

is between one and three storeys (this includes the accommodation within the roof). The building and grounds appear to be well-maintained.

9. The remainder of the site contains:
 - Ornate/landscaped gardens adjacent to the house (in the west, south and east), containing a variety of tree and plant species;
 - to the west and south-west is a field, which is undeveloped;
 - to the south is a paddock; and,
 - to the north of the house is a tennis court and single storey outbuilding.
10. Lingfield House is located in the highest point of the site. The land within the site gently slopes downwards from east to west, a level change of 4 metres (approx.). From north to south there is 9 metre level difference from Lingfield House to the lowest point being on the southern edge of the site.
11. To the south of the site is Jacksbridge Farm, which contains a cluster of buildings (approx. 150 metres from Lingfield House) mainly linked to agricultural uses with some residential. Notably there are two large barns, some smaller barns, and residential dwellings. Immediately to the north is undeveloped land, also within the Green Belt. This contains what appears to be an established but informal walking route spanning from east to west. This land has a width from north to south of approximately 35 metres. The closest built development to the north is within the Lingfield settlement boundary, along Drivers Mead. This development appears to date from the 1950's and is predominantly in the form of two storey semi-detached buildings with pitched roofs, bungalows are pepper-potted in between giving relief from the taller built form.

Relevant History

12. 2022/116/EIA – EIA screening opinion for refurbishment of Lingfield House and development in the grounds to provide an integrated retirement community (Use Class C2) comprising 135 independent living apartments, communal facilities, GP consulting rooms and associated landscaping and parking.
13. 2004/256 – Erection of side and rear extension plus garage – Approved 27.04.04
14. 2003/440 – Erection of side and rear extension plus garage – Approved 19.05.03
15. 2002/167 - Replace velux windows with dormers - Approved 01.04.02
16. 2001/1750 - Erection of new piers and gates - Approved 22/02/02

Proposal and Key Issues

17. The proposal is for an integrated retirement community (Use Class C2) comprising up to 117 independent living apartments and 11 cottages together with associated communal facilities and consulting rooms, landscaping, amenity space provision and parking including a new and reconfigured access from East Grinstead Road and footway improvement works, containing the following elements:

18. The conversion of Lingfield House (also referred to as the Main House), which would house a number of key functions to include the following:
 - multi-function room;
 - commercial kitchen;
 - sitting room;
 - living / Dining room;
 - library;
 - gym;
 - hydrotherapy pool;
 - 6 x Guest suites; and
 - staff area.
19. The construction of a two-storey building (north of Lingfield House) referred to as Mortar communal building which would house three x consulting rooms and reception area, a community fridge, store, staff room, kitchen and WC.
20. The development of up to 128 (Use Class C2) independent living apartments and cottages contained within:
 - 10 x residential blocks to contain up to 117 apartments:
 - Sky Bridge Buildings – Cessili, Dorothy and Rita buildings: six x three-storey buildings (each pair linked by bridges); and,
 - Double Gable buildings – Allan, Donald, Stanley, Parker buildings: three times x three storey buildings.
 - Cottages: James, Adam, Kate Cottages: 11 units contained within three x two storey terraced blocks with pitched roof.
21. The proposed development will serve residents over the age of 70 and all of the extra care units are available for purchase on a leasehold basis.
22. The key issues relevant to this Application are:
 - Principle of Development;
 - Impact on the Green Belt;
 - Infrastructure;
 - Housing Need;
 - Affordable Housing;
 - Character and Appearance;
 - Residential Amenity;
 - Parking Provision and Highway Safety;
 - Flood Risk Management;
 - Landscaping and Trees;
 - Energy / Sustainability
 - Biodiversity
 - Very Special Circumstances

Development Plan Policy

- Tandridge District Core Strategy 2008
- Tandridge Local Plan Part 2 – Detailed Policies 2014
- Emerging Tandridge Local Plan 2033

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

- Lingfield Village Design Statement (SPG)
- Surrey Design Guide (2002)

National Advice

- National Planning Policy Framework (NPPF) (2021)
- Planning Practice Guidance (PPG)
- National Design Guide (2019)

Statutory Consultation Responses

23. List of consultees:

- Gatwick Airport Limited
- Lead Local Flood Authority
- SCC Highways
- Surrey Wildlife Trust
- Natural England
- Environment Agency
- Surrey Police
- SCC Adult Social Care
- TDC Housing Team
- TDC Environmental Health
- TDC Tree Officer
- SES Water – no response
- Thames Water – no comments
- Southern Water – no response
- Canal and River Trust – no comments
- Historic England: no comment
- Surrey County Council - Contaminated Land: no comment
- SGN Plant Protection Team – no response
- Highways England – no response received

24. **Statutory Consultees:**

Consultee:	Surrey County Council Highways	Date received:	12 August 2022 & 22 September 2022
Summary of comments:	<p>12 August 2022:</p> <p>The response requests the following be provided by the Applicant:</p> <p>1. The proposed southbound bus stop on East Grinstead Road is opposite a road junction. It is considered that it will be difficult for drivers to turn right into and out of Drivers Mead when there is a bus at the stop. Drivers may try to make the turn when they can't see possibly leading to the potential for collision. Could the applicant please consider the location of the bus stop in respect of the above concerns.</p> <p>2. The speed survey data provided in the Transport Assessment records at site 2 mean speeds of 35 mph northbound and 34.7 m southbound. This complies with SCC's Policy for a signs alone</p>		

speed limit reduction to 30 mph and could therefore be extended as far as the survey site. This will mean that both the site entrance and the new pedestrian refuge island are in the 30 mph speed limit. This will require an amendment to the TRO, Can the applicant confirm they are happy for this to be included in the proposals. Consultation is taking place with Surrey Police for their acceptance of this reduction.

3. Could the Travel Plan submitted with the planning application please be amended to include the following:

- Will any showers be provided for Staff (para 6.6)?
- Could the contact details of a member of staff within Revere Life be included, to be
- contacted if necessary prior to the appointment of the Travel Plan Coordinator.
- If targets are to be set for residents - as referred to in para 7.4 - will a baseline survey also
- be undertaken for residents (only employees are referred to in para 7.4 with regard to the baseline survey)?
- Table 9.1 (action plan) should be Table 7.1.
- Section 8 should refer to monitoring the use of the EV charging bays, so that the passive EV

provision can be activated if necessary.

4. The proposed access drawing does not indicate the gradient the bank that adjoins the carriageway of East Grinstead Road will be regraded to and SCC will need to see the

Geotechnical Design Report work for the proposed works and that would include the slope

stability analysis. This will determine the extent of the regraded area.

The drawing is a 2D plan and it is not clear what the gradient of the new access will be. . It is

not considered that it will be the same as the regraded bank and therefore it will be a

shallower section of regrading. If this is the case the interface details (i.e. retaining walls/

graded ground etc) between the two would need to be submitted and it is not clear how

this will affect the required visibility splays and could have an affect on the extent of the

regraded areas. (In accordance with Surrey Design the access should be no more that 1:20

for the first 20 m as the access will be used by service vehicles and there should be no

obstruction to visibility splays above 1 m in height from ground level).

5. The Transport Assessment on Page 25 'Baseline Traffic Conditions' refers to traffic data

being obtained along East Grinstead Road but does not give any information about where

this was obtained or the age of the data.

Please request that the Applicant provides the above amendments/information in sufficient time

so that we may respond before your deadline for determination.

Please ensure that the

response to this letter is in writing and all appropriate documentation, as requested, is attached.

22 September 2022

Recommendation for an appropriate agreement should be secured before the grant of permission.

A contribution of £6,150 for the monitoring fee for the Travel Plan.

Conditions

1. Condition for a S278 Agreement in general accordance with drawing no. 2102036-03 Rev
 - I. A 2m wide footway to be provided on the western side of East Grinstead Road connecting the southern site access to the existing footway at Drivers Mead.
 - II. A 2 m wide footway on the eastern side of East Grinstead Road to connect to the existing footway to the north of Orchard Court Care Home,
 - III. The existing footway to the north of Drivers Mead along the western side of East Grinstead Road to be widened to 2m and tactile paving to be provided across the junction of Drivers Mead.
 - IV. The provision of a pedestrian refuge island across East Grinstead Road to measure 2m in width and provided with dropped crossings and tactile paving.
 - V. Relocation of the 40/30 mph speed limit signs to a position to be agreed with Highway Authority and subject to TRO approval.
 - VI. The provision of new bus stops on the eastern and western side of East Grinstead Road, both to be provided with the following facilities:
 - 9m straight length of accessible kerbing at 140 mm in height
 - 23m bus cage markings and bus stop clearway
 - bus shelters with lighting and seating
 - bus flag and pole
 - Real Time Passenger Information (RTPI)
 - minimum 3m width of footway at the bus stops
2. The development shall be commenced unless and until the proposed vehicular access to East Grinstead Road has been constructed and provided.
3. No occupation of the development unless and until the proposed modified southern vehicular access to East Grinstead Road has been constructed
4. Parking to be laid out in accordance with the approved plans
5. Cycle and mobility parking details

6. Electric Vehicle charging points
7. Adherence to Travel Plan
8. revised Construction Transport Management Plan

Reason: So that the development does not prejudice highway safety or cause inconvenience to other highway users.

Informatives

A list of 12 informatives has also been recommended.

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Note to LPA

Accessibility

The proposed development is situated approximately 200 m south of Lingfield Village centre, a short walking distance to a number of local amenities. The proposal will provide a new footway on either side of East Grinstead Road linking the site to the existing footways network to provide a direct link to Lingfield.

There are currently bus stops located approximately 160 m from the site outside Lingfield doctors surgery serving routes 236 and route 409 which offers an hourly service on weekdays and two hourly at weekends between East Grinstead and Selsdon. These bus stops offer very little in the way of facilities and improvements are not possible due to the limited width of the footway. The proposal therefore provides two new bus stops with shelters, accessible kerbing, seating, lighting and real time passenger information close to the development with a new 2m wide pedestrian

island to connect the two stops. Additional services can be accessed along the High Street approximately 300 m north of the site.

Lingfield railway station is located approximately 1.2 km north east of the site (a 15 minute walk or a 5 minute cycle ride) with services every 30 minutes to East Grinstead and London Victoria. The proposals include on-site transportation in the form of an electric minibus which can be booked by residents for trips to the supermarket, hospital appointments when required and offers an alternative to the private car.

Access Arrangements

The existing access to Lingfield House will be retained but widened to allow simultaneous entry and exit for vehicles. A new priority junction access will be constructed approximately 100m to the south of the existing Lingfield House access and will provide simultaneous entry and exit for vehicles.

To ascertain the required visibility splays two automatic traffic counters were placed along East Grinstead Road, one to the north of the site and one to the south to record vehicle speeds and appropriate visibility splays calculated for both the new and existing access. To achieve the visibility splays for the proposed access the embankment adjacent to East Grinstead Road will need to be

regraded and a number of highway trees removed for which the County Council will require a full CAVAT value payment.

The two site access junctions with East Grinstead Road have been modelled five years following submission of the planning application using the Junctions 9 (PICADY) software and the results demonstrate that both site access points would operate well within their theoretical capacity and would not lead to any queuing and therefore there would be no impact on the free-flow of traffic on East Grinstead Road.

Proposed Trip Generation

An assessment of the likely trip traffic generation has been carried out using the TRICS database, which shows that the total trips for the independent living units and doctors consulting rooms would result in 21 two-way trips in the am peak hour and 32 two-way trips in the pm peak. Due to the nature of the proposed development the peak periods for arrivals/departures are not within the typical network peak periods of 8-9 am and 5-6 pm and therefore fall outside of these times.

it is accepted that the development will result in an increase in vehicle movements on the local road network within the peak periods when considering the existing residential use but this is not considered to have a significant impact on the local road network. Servicing Arrangements.

All servicing (deliveries and refuse collection) will take place within the site and swept path analysis has been provided demonstrating that a refuse and delivery vehicle can turn within the site and exit both access points in forward gear.

Emergency access to the site will be taken from East Grinstead Road via both access points and a swept path analysis demonstrates a fire appliance can access the site in forward gear and negotiate the internal access road and exit the site in forward gear via both accesses.

Parking

It is proposed to provide a total of 145 parking spaces on-site for residents, staff and visitors with 9 of these spaces designated as disabled and accords with Tandridge parking standards and is considered sufficient to the Highway Authority.

Cycle Parking

The proposals include 60 cycle parking spaces throughout the site and 6 spaces for mobility scooters which will be secure and undercover. The applicant has stated that the use of these will be monitored and increased parking space provided if necessary. Construction Transport Management Plan A CTMP has been provided however this will need to be revised as per condition 7. This will also require the applicant to include a requirement that no construction traffic is to use/cross Jacks

	Bridge which is 200-300 m south of the site along East Grinstead Road. The bridge doesn't have a signed weight restriction however, it has not passed the 40t assessment and therefore a routing plan will need to be provided to avoid it and the applicant will need to ensure that the supply chain etc know and only use the agreed construction traffic route.
Officer Response:	Officers note that the applicant provided information to address the initial concerns, in its second responses County Highways recommended a series of heads of terms, conditions and informatives. Officers are agreeable to their conclusion provided that the recommended condition for a s278 is secured by a s106 agreement.

Consultee:	SCC Adult Social Care	Date received:	28 October 2022
Summary of comments:	<p>It is positive to see a range of facilities presented alongside suitably designed apartments, and a commitment to a 24/7 onsite care presence of a CQC-regulated provider. This reflects recognisable standards for extra care housing, assisted living or (as per What is an Integrated Retirement Community? ARCO (arcouk.org)) an integrated retirement community. The applicant should:</p> <ul style="list-style-type: none"> • Evidence how it will assess prospective residents for suitability, based on its assumption that they will need "at least" two hours of care a week alongside a clear focus on supporting older people • Set out how the management charges will be applied for residents across the entire site, with everyone paying towards the communal facilities and the on-site care and housing management team, whether in the cottages or the apartment buildings. 		
Officer Response:	Comments noted – the applicant responded to confirm each resident will be assessed by an independent GP prior to occupation to understand their care needs. Management charges will be priced on a pro rata £ per sq ft rate for each resident across the site.		

Consultee:	Surrey Police - Designing out Crime Officer	Date received:	24 August 2022
Summary of comments:	<p>Thank you for the opportunity to comment on this application for the residential development at the above location. I can only make comment on the security of the proposed development.</p> <p>To reduce crime and the opportunity of crime I apply principles of Crime Prevention through Environmental Design (CPTED). The CPTED concept relies on a premise that the way space is designed can have an effect on the behaviour of people using it and how the built environment can send out signals which people either consciously or sub-consciously recognize and respond to.</p> <p>Crime should not be a standalone issue which is why guidance on crime has been embedded throughout the guidance on design rather than being set out in isolation. Supporting recommendations contained within the Home Office publication the national Policy Framework (republished February 2019) which underpins guidance to ensure crime and disorder or the fear of crime does not undermine quality of life of community cohesion and resilience.</p>		

	<p>Specifically, section 8, Promoting healthy and safe communities and Section 12, Achieving well designed spaces.</p> <p>I have reviewed the Design and Access statement for the proposed development and associated documents. I note that the architects mention part Q but have provided no further details in relation to the security of the development. In relation to the site, I note parking has been allocated around the proposed access road for the development. I have concerns about the natural surveillance of the communal parking next to Rita Building, Parker Building and Donald Building, in view of the current issues regarding catalytic and keyless car theft in Surrey. I would welcome dialogue with the applicant to address the security considerations for this development and the permeability of the site.</p> <p>Please can the attached document be shared with the developer for this application for their consideration.</p> <p>To support Approved Document Q which was incorporated into the Building Regulations 2010, in October 2015: compliance to the 'Secured by Design' scheme would satisfy all requirements and further supports the applicant's submitted intention to achieve a sustainable development.</p> <p>Use of the home Office Secured by Design (SB) award scheme as a planning condition would provide both the developer and future residents with a police preferred minimum level of security. Reducing opportunity for crime and the fear of crime to support community sustainability clearly in line with current policy.</p> <p>The Secured by Design scheme can be viewed at www.securedbydesign.com</p> <p>I recommend the following planning condition is included.</p> <p>I offer the following wording for consideration. "The development shall achieve standards contained within the Secure by Design award scheme to be successfully granted the award."</p> <p>I ask that these comments are brought to the attention of the planning committee and copied to the applicant for their attention.</p> <p>If I can be of further assistance on this application, please do not hesitate to contact me.</p>
Officer Response:	Officers accept and include the Secure by Design condition.

Consultee:	the Lead Local Flood Authority (LLFA)	Date received:	14 June 2022 & 31 August 2022
Summary of comments:	<p>14 June: The LLFA was not satisfied with the proposed drainage scheme, due to concerns about the attenuation area and calculation, discharge of surface water, and the pipework to the proposed ditch outfall.</p> <p>31 August: The LLFA is satisfied that the proposed drainage scheme meets the requirements set out in the aforementioned documents and are content with the development proposed.</p> <p>Should planning permission be granted, the LLFA advises a suitably worded condition is applied to ensure that the SuDS Scheme is properly implemented and maintained throughout the lifetime of the development. Furthermore, a condition is recommended for a</p>		

	<p>verification report to ensure the approved SuDS scheme has been implemented.</p> <p>An informative regarding the impact on the ordinary watercourse.</p>
Officer Response:	In the instance that the application is approved, officers are agreeable to the proposed conditions which are included within the list of conditions.

Consultee:	Gatwick Airport	Date received:	1 June 2022
Summary of comments:	<p>With respect to aerodrome safeguarding, the proposal is not considered to conflict with safeguarding criteria and therefore no objections are raised.</p> <p>However, the following observation is made:</p> <p>Cranes: Given the nature of the proposed development it is possible that a crane may be required during its construction. The applicants' attention the to the requirement within the British Standard Code of Practice for the Safe use of Cranes, for crane operators to consult the aerodrome before erecting a crane in close proximity to the aerodrome. Gatwick Airport requires a minimum of four weeks notice. For crane queries please visit Crane Permits (gatwickairport.com) or email cranes@gatwickairport.com.</p>		
Officer Response:	Response noted – should the application be approved, the advice provided in regards to cranes will be included as an informative for the attention of the applicant.		

Consultee:	Environment Agency	Date received:	6 July 2022
Summary of comments:	<p>No comments to make.</p> <p>However, if the application at a later stage proposes the use of non-mains drainage, the EA must be consulted.</p>		
Officer Response:	Officers will include the comments regarding drainage as an informative.		

Consultee:	Surrey Wildlife Trust	Date received:	14 October 2022, 9 November 2022 and 23 November 2022
Summary of comments:	<p>23 November:</p> <p>This is the third consultation provided for this planning application. Since the consultation provided on the 9th November 2022 – the LPA has provided us with an additional technical note on Ecology (Greenspace Ecological Solutions, 2022).</p> <p>Bat Roost in B1 In the additional technical note, it states that the Applicant has confirmed no works will affect the bat roost within B1 and that no further survey is required. No further comment on this point, however, if this changes, then we would advise that further bat surveys would be required.</p>		

Bat Activity Surveys

No bat activity surveys of the proposed development site have been carried out despite the recommendation provided in 2017 report by Greenspace Ecological Solutions. However, Greenspace Ecological Solutions have assessed that the completion of bat activity surveys would result in no change to the mitigation currently proposed... and that further activity surveys bats would not be reasonable or proportionate in this instance.

We would advise the LPA that bat activity survey data would have benefits for the project because it would mean the mitigation strategy and impact assessment is evidence-based.

However, we note that good practice principles and design have been embedded into the project as part of the proposal, as outlined in the response note. In conclusion of this point, we would advise that the Applicant is required to carry out the development in line with these measures recommended and provided by Greenspace Ecological Solutions Ltd.

Tree Removals and Bats

We have no further comment on this point, based on the detail provided in the response note by Greenspace Ecological Solutions. As a precautionary approach, we would advise that the felling of trees is carried out under the supervision of an ecological clerk of works. The ecological clerk of works would carry out a pre-felling inspection to ensure that the activity is in line with the legislation afforded to species such as bats (and birds).

9 November:

This is the second consultation provided for this planning application. Since the consultation provided on the 14th October 2022 – the LPA has provided us with an additional technical note on Ecology (Greenspace Ecological Solutions, 2022). The scope of this document is to provide a validity statement for the LPA, due to the age of the 2017 Extended Phase 1 Habitat Survey.

This validity statement appears to be suitable to support the planning application. It concludes that with no significant change to the status of the Site...the conclusions and recommendations set out within the 2017 report remain current and valid.

We would advise the LPA that this submission is sufficient to respond our comments provided under the sub-heading 'Extended Phase 1 Habitat and Habitat Suitability Index (HSI) Survey (Greenspace Ecology, 2017)', however, it does not provide further information on the comments provided under the sub-heading 'Bats'. For ease of reference, we have provided key elements of this sub-heading and information below.

Bats

The Extended Phase 1 Habitat and Habitat Suitability Index (HSI) Survey (Greenspace Ecology, 2017) states that 1000+ bat droppings were recorded in Building B1 – indicating the presence of a long-eared roost. A single bat was also recorded in the building. Building B2 was assessed to have negligible suitability to support a

bat roost in 2017. The numbering of the Phase 1 habitat map for buildings does not appear to be accurate as B2 is the larger building and B1 the smaller building.

Section 5.4 of the Extended Phase 1 Habitat and Habitat Suitability Index (HSI) Survey (Greenspace Ecology, 2017) states that further activity surveys of the wider site will be required and further surveys of the B1 will be required if the roof void is impacted.

On this point we would advise that:

- The Applicant should provide further information on the bat activity surveys of the wider site that were recommended in the 2017 report. We have found no evidence that these bat activity surveys have been carried out.

- The LPA must be confident that the building which supports the long-eared roost will not be impacted by the project at any stage. This would include direct impacts and indirect impacts – which would include the intentional or reckless obstruction of access for bats to a roost. Even the 2021 technical note by Greenspace Ecological Solutions does not provide certainty on this point. It states “*Therefore, building B1 remains a confirmed bat roost and will require three further dusk emergence/pre-dawn re-entry surveys to determine how bats are using the structure and a licence sought from Natural England prior to any works on the building that could impact roosting bats (if required)*”. The LPA must have certainty on the proposals and possible impacts to this building (and bats), prior to determination.

- Linked to this point, we would advise that further justification for the lighting masterplan, especially in proximity to B1 (the building which supports the long-eared roost is provided. Section 3.3 of the Lighting Masterplan does not appear to show any proposed ‘bespoke’ lighting around B1 which has been shown to be a brown long-eared bat roost. The submitted lighting design therefore does not appear to reflect the guidance note on the importance of lighting considerations in the vicinity of a bat roost.

Arboricultural Impact Assessment

Section 5.2 of the report details significant tree removal for arboricultural reasons and to enable the proposed development. We have not found the results of a bat preliminary ground level tree roost assessment. We would advise that the results are provided prior to determination. This information has not been provided in the 2021 technical note and we have not found this information in any other ecology report submitted.

9 November 2022

SWT raised the following key concerns:

- the need to see Section a Preliminary Ecological Appraisal, undertaken in 2021.
- The need to review all information relation to bats.
- The provision of an impact assessment for the roost within B1, even if the building is not being directly impacted. In the absence of bat activity surveys data, it is not clear how the lighting strategy has been designed.

	<ul style="list-style-type: none"> • The submitted lighting design does not appear to reflect the guidance note on the importance of lighting considerations in the vicinity of a bat roost. Further justification of lighting masterplan required. • Tree removal: SWT have not found the results of a bat preliminary ground level tree roost assessment. We would advise that the results are provided prior to determination.
Officer Response:	Noted and information supplied to satisfy concerns raised by SWT accordingly.

Consultee:	NHS Property Services Ltd	Date received:	28 November 2022
Summary of comments:	<p>The development will put pressure on local NHS healthcare services, and the Integrated Care Board are concerned that the health proposals put forward by the applicant would not mitigate its impact on healthcare and would therefore not be sustainable development. It also is unclear how the arrangements for a private GP can be effectively secured in perpetuity in the S106, and it is very unlikely that residents would want to pay to attend a private GP when they are already registered, or could register with, a local NHS GP.</p> <p>The NHS has established approaches to effectively mitigate the health impacts from development and this should be explored.</p>		
Officer Response:	Noted and considered in the Infrastructure section of this report.		

Third Party Comments

Lingfield Parish Council – no comment.

Objections:

A significant number of objections have been received which raise the following points, those which are material planning considerations are addressed in the 'Assessment' section of this report:

- Greenbelt impact
 - Harm to openness of GB
 - Inappropriate development
 - No very special circumstances
 - Development would constitute sprawl
- Highways/transportation impacts
 - Traffic Safety – accidents and deaths in past
 - Insufficient parking provision
- Need for elderly accommodation not justified
 - Already a retirement village at Charters Village – 2 miles
- Affordable housing
 - There is a need for social and affordable housing
 - Affordable housing should be prioritised
- Infrastructure: GP provision
 - Concern that elderly residents would increase pressure on healthcare
- Not beneficial to residents – harm to infrastructure

- Employment - minimal employment opportunities
- Harm to character of landscape
- Out of scale
- Overdevelopment
- Flooding is an issue on East Grinstead Road
- The developer did not engage effectively with the community – leaflets not sent to all residents
- Valuable land with deer, foxes, owls and other valuable mammals.

General comments:

General comments were made and raise the following points:

- No S106 with the application (Officer comment – legal agreements are normally negotiated, through the application process, particularly if minded for approval
- Build more retirement homes to free up the market

Support:

A significant number of representations in support of the application have been received – the comments made are summarised below:

- The scheme is well integrated discreetly located and supports sustainable growth.
- The homes help to address a need for this type of retirement care home facility.
- Provision for new GP consulting rooms welcomed, alleviating adverse impacts on local healthcare infrastructure.
- 21% net biodiversity gain, employment opportunities for construction and operational jobs, the community fridge, are evidence that this scheme meets the intergenerational needs of the community.

TDC advice

25. The following TDC consultation responses were received.

Consultee:	TDC Environmental Health	Date received:	16 June 2022
Summary of comments:	Should planning permission be granted the following conditions are recommended: <ul style="list-style-type: none"> - Implementation of the measures in the lighting strategy report and adherence to the requirements of the Institute of Lighting Professionals Guidance Notes for the Reduction of Obtrusive Light; - Dust control measures during construction. - Hours of construction to be limited. 		
Officer Response:	Officers note the comments made and agree that the conditions should be applied if the application is minded for approval. Due to the scale of development and extent of the site, officers consider that an Construction and Environmental Management Plan would be necessary in this instance and this would cover matters regarding dust.		

Consultee:	TDC Housing Team	Date received:	24 June 2022
Summary of comments:	<p>The applicant is proposing a development of up to 128 independent living apartments and cottages with communal facilities and consulting rooms as part of a proposed integrated retirement community. The applicant submits that the scheme falls within Use Class C2 and as such is not expected to contribute towards an affordable housing provision. Use Class C2 (Residential Institutions) relates to the provision of residential accommodation and care to people in need of care. It includes hospitals, nursing homes, residential schools or training colleges. In contrast, the dwellings proposed can be used as independent dwellings where occupants will have their own front door and private facilities. The occupants are free to engage or not with the other facilities available, much like they would in any settlement, provided they meet the age restriction and purchase a mandatory 2 hours per week care. They will be liable for council tax in the same way as a C3 dwelling house and the dwellings count towards housing supply in the district, as a C3 dwelling house would too. It is therefore our expectation that this proposal should include up to 34% onsite affordable housing and in its current form does not meet the requirements of policy CSP4.</p> <p>Furthermore and notwithstanding the above, should the decision maker be satisfied that the description of the proposals meets the definition of Use Class C2, this does not automatically preclude the requirement to provide affordable housing. Where residential units are capable of being independent dwellings, then they can be regarded as 'dwellings' even where there is an element of care provided. CSP4 does not differentiate between Use Classes and as such this proposal should trigger an affordable housing requirement either way.</p> <p>The application site is of sufficient size to accommodate onsite provision and Officers can provide the applicant with a suitable mix for onsite affordable housing, in line with the requirements of policy HS4A of the Housing Strategy.</p>		
Officer Response:	Officers note the comments and a Financial Viability Assessment was undertaken to establish if the scheme could generate affordable housing. This is addressed in the officer report.		

Consultee:	TDC Principal Tree Officer	Date received:	28 July 2022
Summary of comments:	<p>This site has two main character areas – the main house and its mature landscaped grounds, and the field set to pasture beyond. As you might expect, the trees of highest landscape value can be found within the formal grounds of Lingfield House itself with a strong mix of mature landscape trees and early mature specimens that have significant future potential, and formal hedges. There are also many less formal groups of small trees and mature shrubbery. There are a total of 74 individual trees surveyed, 28 group of trees and 27 hedge elements.</p> <p>According to the submitted arboricultural impact assessment, construction of the proposal will require the removal of 23 individual</p>		

	<p>trees, 12 full groups of trees, 4 partial groups, and 12 hedge sections.</p> <p>The large majority of the trees of landscape significance are to be retained. In this instance I am less concerned about the relative BS5837 categorisation of trees to be removed, as the focus should be on landscape impact. In that sense the impact will be moderately negative in the short term, particularly with the removal of trees T57-T62 on the frontage, required for the formation of a visibility splay for the proposed new access.</p> <p>The vegetation losses will be mitigated and compensated for in the medium and long term, however, with the extensive tree, hedge and shrub planting proposed throughout. A total of 122 semi mature trees are proposed for planting, and a diverse mix of native and non-native trees are indicated giving a high level of biodiversity value, climate change and pest and disease resilience. Significant ecology and biodiversity enhancements are also proposed throughout the site, and in particular in the areas currently set to pasture.</p> <p>There are several areas where the root protection areas of retained trees are encroached, and whilst only the principle of mitigation is shown on the submitted tree protection plan and within the submitted report, I am satisfied that the works can be achieved without significant harm to retained trees, albeit much more technical detailed information would be required under condition should you be minded to grant consent.</p> <p>In conclusion I have no arboricultural objections, subject to the following conditions:</p> <ol style="list-style-type: none"> 1. Hard and soft landscaping 2. Trees – Arboricultural method statement
Officer Response:	Officers note the comments and include them within the

Assessment

Procedural note

26. The Tandridge District Core Strategy and Detailed Local Plan Policies predate the NPPF as published in 2021. However, paragraph 219 of the NPPF (Annex 1) sets out that existing policies should not be considered out-of-date simply because they were adopted prior to the publication of the Framework document. Instead, due weight should be given to them in accordance to the degree of consistency with the current Framework.

Principle of development

Sustainability

27. The NPPF 2021 states that local planning authorities should support a pattern of development which, where reasonable to do so, facilitates the use of

sustainable modes of transport, and that developments should be located where practical to give priority to pedestrian and cycle movements, and have access to high quality public transport facilities. The NPPF does, however, recognise that opportunities to maximise sustainable transport solutions will vary from urban to rural areas. Policy CSP1 of the Tandridge District Core Strategy (2008) states that in order to promote sustainable patterns of travel, and in order to make the best use of previously developed land, development will take place within the existing built up areas of the District and be located where there is a choice of mode of transport available and where the distance to travel to services is minimised.

28. Policy CSP1 seeks to promote sustainable patterns of travel and make best use of previously developed land, by directing development towards the existing built-up areas of the District, our Category 1 settlements. Development appropriate to the needs of rural communities may be permitted in our Category 2 settlements. The latter comprises those settlements defined as Larger Rural Settlements and those washed over by the Green Belt but that have a defined boundary.
29. The application site is located south of Lingfield. It does not adjoin the settlement, and there is undeveloped land spanning of 30 metres (north to south) between the application and the settlement boundary.
30. Lingfield is categorised as a Larger Rural Settlement and a Category 2 Settlement. Within Tandridge District Council's (TDC) emerging Tandridge Local Plan (hereafter referred to as "Local Plan 2033") it is identified as a Semi-Rural Service Settlement, falling within Tier 2. The evidence underpinning the Local Plan 2033 includes a Settlement Hierarchy (2015 and 2018 update), which comprises an assessment of TDC's various settlements and where they sit in the hierarchy. Tier 1 of the hierarchy comprises our most sustainable settlements whilst the Tier 2 settlements are identified as being able to demonstrate good levels of service provision and access to facilities (shops, primary education, community facilities and access to local health care).
31. The spatial strategy, within the Local Plan 2023, directs development towards both TDC's Tier 1 and Tier 2 Settlements. As such the Council have proposed the allocation of land within or abutting Lingfield's settlement boundaries.
32. It is noted that this site does not abut the settlement boundary and as such, is arguably not is a suitable location as it is contrary to the cohesiveness of the settlement form and boundary.
33. The applicant has indicated improvements to make the application site more sustainable by including a walking route/footpath along the East Grinstead Road to the settlement of Lingfield. This would mean that residents would have access to buses and local shops and services. With a walking route, the distance to the Town Centre would be 250 metres from the north-eastern edge of the site. The application site is not within easy reach of Lingfield Train Station.
34. Officers are of the view that despite the improvements to the footpath, they would only head north of the site and while there would be access to bus routes, it is still considered that users of the site would rely heavily on cars to get around the district. This is partly due to the nature of the development, which is a mono-tenure marketed to over 75's and also the location. It is not highly accessible for public transport and there is only a limited offer of shops and services within the settlement of Lingfield and there would be a reliance on cars for journeys

farther afield. Furthermore, the development of this site, would not come forward to address the undeveloped land to the north of the site. By way of the loss of openness this piece of land would no longer form an effective, functioning part of the Green Belt. The failure to effectively masterplan, is considered to be unsustainable

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.
36. *Principle of the land use*
37. Lingfield House is a large single family dwellinghouse which falls within Use Class C3 of the Town and Country Planning (Use Classes) Order 1987 (as amended). The site comprises extensive grounds in the region of xx hectares (ha) containing landscaped gardens, a tennis court, open fields in use for paddocks and other equestrian activities.
38. As a result of the proposal the use of the land would change from Use Class C3 to Use Class C2 – Residential institutions (which includes residential care homes, hospitals, nursing homes, boarding schools, residential colleges and training centres).
39. Officers have carefully considered if the application would constitute a C2 use class. Surrey County Council has prepared a Commissioning Statement (April 2019) for TDC which relates to accommodation with care, residential & nursing care for older people. In considering if a scheme is truly a C2 use class the Commissioning Statement asks the following questions which officers have sought to answer below:

Key Questions	Officer response/assessment
<i>Regarding the facilities</i>	
Does the proposed scheme have facilities not normally associated with retirement or sheltered housing such as bar/ lounge, kitchen/dining room, laundry, crafts room, IT suite, shop, gym etc?	Yes – it would include a restaurant, cafe and bar, multi-function room, commercial kitchen, sitting room, living / dining room, library and IT hub, gym, hydrotherapy pool, guest suites, and consulting rooms.
Will 24 hour care services be available to all residents according to their needs?	Yes – Residents would have a minimum of 2 hours care. The scheme will provide a range of nursing, personal and domestic care services. These services include a 24-hour emergency support response.

Can residents receive/ purchase care from an on-site, CQC registered home based (domiciliary) care team which operates in partnership with the future landlord?	Individual care and nursing to be provided through a Registered Domiciliary Care Service regulated by the Care Quality Commission (CQC) whereby care and nursing services will be delivered directly to residents. Residents are also entitled to use their own care or nursing agency.
<i>Regarding the planned delivery of care</i>	
Does the scheme offer an opportunity for elderly owner-occupiers to purchase their own property in a scheme where an increasing level of care can be provided?	The cottages and apartments within the scheme are to be made available for purchase on a long leasehold basis.
Does the scheme anticipate a range of need levels on site, which could include support to people living with dementia?	Subject to clarification from with the applicant.
Will the scheme help older people stay independent and remain active in old age?	Yes – this appears to be the case. There would be grounds to walk within, a walking route to Lingfield Settlement, as well as a gym. Care appears to be provided to a minimum of 2 hours a week.
Can the developer evidence how residents may be able to avoid admission into residential care as their needs increase?	Not evidenced – Should a resident require specialist nursing for a complex or critical condition, whether temporarily or permanently, it is likely that hospitalisation would be required, or the resident may move to a residential care/nursing facility with such specialist services and equipment. However, Lingfield Gardens will always work with residents and their medical advisors to provide the necessary services and equipment in the residents' own apartment if that is the resident's preference and if it is feasible and safe so to do.
<i>Background of the developer</i>	
What is the average age on entry to existing schemes?	Unknown.
How much care per week was purchased during the first year of operation?	Unknown.

40. Overall, while there are some gaps in the information above, officers are satisfied that the proposal constitutes C2 development.

Principle of Green Belt Development

41. Given that the site lies in the Green Belt an assessment needs to be made in respect of its appropriateness and proportionality and if not, whether very special circumstances exist that outweigh the identified harm to the Green Belt. The other matters concern impact on the character of the open countryside and

the impact on neighbouring amenities, and any highway or ecology issues. The relevant planning considerations are assessed below.

Impact on the Green Belt

Policy Background

42. The proposal site is located within the Green Belt and the National Planning Policy Framework (NPPF) 2021 advises that the fundamental aim of Green Belt is to prevent urban sprawl by keeping land permanently open. The essential characteristics of Green Belts are their openness and permanence and, to this end, paragraph 147 of the NPPF says that new development in this area would be considered as inappropriate and therefore harmful and should not be approved except in 'very special circumstances' (VSC). Further to this Paragraph 148 adds that such circumstances will not exist unless the potential harm to the Green Belt, and any other harm, is clearly outweighed by other considerations.
43. Paragraph 149 of the NPPF sets out a number of exceptions for the construction of new buildings in the Green Belt none of which apply to the proposed development.
44. Local Plan Policies DP10 and DP13 reflect the provisions of the NPPF 2021 and Policy DP10 says that within the Green Belt, planning permission for any inappropriate development which is by definition harmful to the Green Belt will normally be refused. Proposals involving inappropriate development in the Green Belt will only be permitted where sufficient very special circumstances are considered to exist, to the extent that other considerations clearly outweigh any potential harm to the Green Belt by reason of inappropriateness and any other harm. Local Plan Policy DP13 further elaborates how development in the Green Belt may be justified and says that unless very special circumstances can be clearly shown to exist, the Council will regard the construction of new buildings as inappropriate in the Green Belt.
45. In order to consider the acceptability of the proposal in regards to its impact on the Green Belt, it is necessary to refer to the following key questions:
 1. Whether the proposals constitute inappropriate development in the Green Belt;
 2. The effect of the proposals on the open nature of the Green Belt and the purposes of including land within it; and
 3. Whether the harm to the Green Belt is clearly outweighed by other considerations so as to amount to the very special circumstances (VSC) necessary to justify inappropriate development.
46. The application is accompanied by a Planning Statement titled Planning Policy Statement (PPS), prepared by QED Planning, dated March 2022.

Q1. Does the proposal constitute inappropriate development in the Green Belt

47. Paragraph 134 of the NPPF 2021 states that the Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

48. Paragraph 138 of the Framework sets out the five purposes of the Green Belt:
- a) to check the unrestricted sprawl of large built-up areas;
 - b) to prevent neighbouring towns merging into one another;
 - c) to assist in safeguarding the countryside from encroachment;
 - d) to preserve the setting and special character of historic towns; and
 - e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
49. The application site lies to the south of the settlement of Lingfield. The proposal site is one plot removed from the settlement, with the plot to the north being undeveloped Green Belt land. Due to its physical location, the application site achieves a key objective of the Green Belt by restricting the sprawl of development, and in this specific case, a continuous ribbon of development linking to the cluster of buildings in and around Jacksbridge Farm to the south of the site.
50. The application site does contain some development due to its existing residential use. The main building is Lingfield House which is regarded to be a single building on an extensive plot. The limited developed extent of site helps to safeguard the countryside from encroachment by maintaining its openness and this assists in urban regeneration by encouraging the reuse of derelict and other urban land or previously developed land in line with the NPPF.
51. The application site therefore serves least three (identified at NPPF para 138 a, c & e) of the five purposes of the Green Belt and the site's inclusion within the Green Belt boundary is therefore considered to be strongly justified from a local and national perspective.
52. Paragraph 147 of the NPPF 2021 makes clear that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Paragraph 149 of the framework regards the construction of new buildings as inappropriate development within the Green Belt. However, paragraph 149 does allow for several exceptions set out in sub-paragraphs a-g. In this case, the proposal would fail to meet the exceptions in sub-paragraphs a-g.
53. As the proposed development would not meet any of the exceptions to Green Belt policy referred to in the NPPF or the Local Plan policies, it is therefore considered to constitute inappropriate development. The site is not within a Defined Village in the Green Belt and therefore wider Green Belt policy would apply. Officers note that this is a conclusion shared by the applicant and the PPS states that, "notwithstanding the presence of the existing dwelling on the site, the applicant accepts that the proposed integrated retirement community would not accord with any of the NPPF exceptions".
54. In such cases, the Framework advises at paragraph 148 that "when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations" (paragraph 148). Following further considerations below the LPA will conclude its assessment with a review of the applicant's case for 'Very Special Circumstances'.

Q2. The effect of the proposals on the open nature of the Green Belt and the purposes of including land within it

55. Having established that the proposal comprises inappropriate development, it is necessary to consider the matter of harm. Inappropriate development is, by definition, harmful to the Green Belt, but it is also necessary to consider whether there is any other harm to the Green Belt and the purposes of including land therein. As noted above, paragraph 147 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 Green Belts being described as their openness and their permanence.
56. Planning Practice Guidance provides further clarification about the definition of openness and specifies that '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'. Furthermore, 'the degree of activity likely to be generated, such as traffic generation' can also be considered.
57. This planning application has been submitted in detail and therefore officers have a very good appreciation of how the proposed development would appear from reviewing the drawings, accompanying information and visiting the site. Officers take the view that the proposal would extensively and for the most part of the site, evenly distribute buildings and associated development such as roads and hardstanding across the site – thus is a notable increase volume.
58. Officers note that the proposed development would not be highly visible from some views, particularly wider views (from more than approx. 1 km) and views from the west where there is limited public access/rights of way. The Council has undertaken a Green Belt Assessment and Landscape Assessment to inform its emerging Local Plan (2033) and assessed the Green Belt at various levels. This site has been analysed as part of the Landscape Assessment which states that that the majority of views of the site are 'relatively localised' and that development in the south-east of the site would be visible above the site boundary in views from East Grinstead Road. The Landscape Assessment concludes that the visual sensitivity of the site is 'moderate' and that the landscape capacity for housing development in this location is 'judged to be low/medium due to its substantial sensitivity, including in particular, its inconsistency with the existing settlement'. And notably it states that 'the site is beyond existing soft southern settlement edge, currently defined by strong belt of vegetation at the top of slope. North of flood zone'. Whilst there are no formal footpaths in the immediate vicinity of the site, it is noted that there are informal footpaths.
59. In the assessment of this application officers consider that the proposal will be visible from the streetscene, particularly from the south east where it is considered that Kate and Ada Cottages, Rita Building and Cessili Building would be highly visible. In addition, the formation of a new pedestrian link along East Grinstead Road, to the settlement of Lingfield is considered to introduce a new route by which the site would be more visible to members of the public in views from the north and east. Officers note that the bulk of the development (and the tallest buildings) would be placed in the west of the site.
60. Opportunities to create a greater sense of relief between the proposed buildings, to respect the openness of the Green Belt have been neglected within the proposal. Due to the quantum, height, scale and massing of development the proposal would comprise a substantial amount of new built

development placed wholly on open Green Belt land. Consequently, it is considered that there would be clear and undeniable harm to openness both visually and spatially.

61. Due to the harm to the visual and spatial openness of the site, the proposal would result in significant harm to openness of the Green Belt contrary to NPPF 2021 and Policies DP10 and DP13 of the Detailed Policies 2014. Substantial weight should be afforded to these factors.

Q3. Whether the harm to the Green Belt is clearly outweighed by other considerations so as to amount to the very special circumstances necessary to justify inappropriate development

62. The NPPF does not provide guidance as to what can comprise 'very special circumstances'. However, some interpretation of very special circumstances (VSC) has been provided by the Courts. The rarity or uniqueness of a factor may make it very special, but it has also been held that the aggregation of commonplace factors could combine to create very special circumstances (i.e. 'very special' is not necessarily to be interpreted as the converse of 'commonplace'). However, the demonstration of very special circumstances is a 'high' test and the circumstances which are relied upon must be genuinely 'very special'. In considering whether 'very special circumstances' exist, factors put forward by an applicant which are generic or capable of being easily replicated on other sites, could be used on different sites leading to a decrease in the openness of the Green Belt. The provisions of very special circumstances which are specific and not easily replicable may help to reduce the risk of such a precedent being created. Mitigation measures designed to reduce the impact of a proposal are generally not capable of being 'very special circumstances'. Ultimately, whether any particular combination of factors amounts to very special circumstances will be a matter of planning judgment for the decision-taker.
63. An assessment of the VSP's is undertaken later in this report.

Infrastructure

64. CS Policy CSP11 (Infrastructure and Services) sets out that appropriate levels of infrastructure and services will be sought. The Council's evidence base includes an Infrastructure Delivery Plan (2019) (IDP) that identifies the District's infrastructure requirements, the priority of infrastructure to be delivered and how it will be funded. This stance is echoed within TLP 2033 Policy TLP 04 (Infrastructure Delivery and Financial Contributions).
65. As set out in Planning Practice Guidance (PPG) (Planning Obligations), "planning obligations assist in mitigating the impact of development which benefits local communities and supports the provision of local infrastructure".
66. It is of course recognised that to secure infrastructure funding any request must meet the three tests set out under Reg 122 of the CIL Regs 2010 and as such must be necessary to make the development acceptable in planning terms, directly related to the development and fairly and reasonably related in scale and kind to the development. Such contributions would be secured throughout the negotiation as part of any S106 Legal Agreement, in the absence of such the proposal would fail to meet the objectives of Policy CSP11 and would be unacceptable.

67. The application site lies within the parish of Lingfield. The IDP has identified a number of different infrastructure requirements for the parish, to which this proposal may be expected to contribute.
68. Within the IDP it sets out health needs and specifically the need to rebuild Lingfield Surgery, noting this is a priority for delivery is 1-5 / 6-10 years (set in 2019). The estimated cost, set out in 2019 is £7.5 million. In addition to health quiet lanes/rural enhancement schemes are also a priority in Lingfield with an estimated cost of £80,000. It is important to note that while extra care is a consideration within the IDP for the District, this was not highlighted as a priority within Lingfield.
69. The proposal contains three consulting rooms, including a reception and WC facilities. The PPS acknowledges the pressures local healthcare providers are facing and to address this, the PPS states that consulting rooms can be made available to local healthcare professionals. Specifically those offering services to the retirement community or as a branch surgery of the existing GP practice (Lingfield Surgery). Through discussions over the course of the application, the applicant has come forward to offer Section 106 head of terms for private GP provision for the proposed development and confirmed that their fees would be covered as part of the overall management fee charged to all residents. This would not be an extra fee to the residents of the development.
70. As set out above the proposal includes consulting rooms and the PPS indicates that these facilities would be offered to the local GP surgery or local health professionals. However, to-date officers have received no communication from the local GP or associated healthcare professionals to indicate either their support for such facilities or a commitment to a joined-up approach to enhancing the local healthcare provision.
71. When considering the healthcare provision in the round, officers consider that the a GP may help to reduce some impact on the local health service. However, the provision is for simply a single GP and while residents may be able to undertake consultations with a private GP, it is currently unclear what wider medical services are offered within the service charges. An area of concern are residents with greater health needs, such as those with long term health conditions who are likely to need to visit nurses, occupational therapists and other health professionals that sit outside of the scope of what a single on-site GP can offer. Furthermore, no indication has been provided to confirm if the residents would benefit from private referrals for further treatment or hospital treatment. It is likely that for more significant treatment or ongoing treatment that the residents are likely to still need to rely on local public health services provided by NHS.
72. To support this assertion, officers have consulted the Joint Strategic Needs Assessment, published by Surrey County Council's Public Health Team. It provides background to the treatment of Long Term Conditions (LTCs). By definition LTCs are health conditions 'which cannot, at present be cured, but which can be controlled with the use of appropriate treatments and/or other therapies'. In particular, the JSNA indicates that 'a number of common risk factors are recognised as increasing the likelihood of LTCs which should be taken into account when assessing risk. These are age, gender and family history / genetic factors which are unmodifiable. For example LTCs are more prevalent in older people – 58% of people over 60 compared to 14% under 40 – and in more deprived groups – people in the poorest social class have a 60%

higher prevalence than those in the richest social class and 30% more severity of disease’.

73. Finally, the JSNA indicates that LTC’s account for:
- “50% of all GP appointments
 - 64% of all hospital outpatients appointments
 - 70% of all hospital bed days; including 50% of emergency bed days for over 75s; and 25% of bed days occupied by someone dying
 - 70% of health and care spend
 - 33% of GP appointments for patients with multiple long-term conditions.”
74. As demonstrated from the above list, not all of the health requirements sit with a GP and it indicates that a broader healthcare package would be needed to support people with LTCs.
75. The applicant’s submission is clear that the proposed development does not offer a care package which would see residents cared for should they have more complex needs. The PPS states that:
- ‘Should a resident require specialist nursing for a complex or critical condition, whether temporarily or permanently, it is likely that hospitalisation would be required, or the resident may move to a residential care/nursing facility with such specialist services and equipment. However, Lingfield Gardens will always work with residents and their medical advisors to provide the necessary services and equipment in the residents’ own apartment if that is the resident’s preference and if it is feasible and safe so to do.’*
76. What is concerning is that the applicant does not appear to offer a seamless care package to either ensure that residents are cared for on-site or off-site. There is concern that there could be a concentration of people requiring social care once they are no longer deemed suitable to stay within the development. This could be burdensome to local healthcare providers and raises the question of how former occupants would be housed and by whom on leaving the site.
77. Officers consulted NHS Property Services, through Surrey’s Public Health Team. A response has been received confirming that the development would put pressure on local NHS healthcare services, and the Integrated Care Board are concerned that the health proposals put forward by the applicant would not mitigate its impact on healthcare and would therefore not be sustainable development. It also is unclear how the arrangements for a private GP can be effectively secured in perpetuity in the S106, and it is very unlikely that residents would want to pay to attend a private GP when they are already registered, or could register with, a local NHS GP.
78. Officers are currently of the view, pending clarification by the applicant that the proposal fails to provide appropriate mitigation to fully offset the impact of the development on the existing public health service. In addition, the proposal fails to benefit the local community by not adequately supporting the provision of local infrastructure.
79. It is also noted that the provision of consulting rooms and GP provision have been put forward as a VSP to justify the acceptability of the development on Green Belt. Given that the proposal fails to simply mitigate its own impact, it is

the case regardless of the Green Belt designation, officers are not accepting of this as a VSC as set out in the relevant section below.

80. In conclusion, officers currently consider that that the proposal would have a detrimental impact on public healthcare provision in the locality. It is also the case that the consulting rooms and the GP provision is not considered be an acceptable addition for the case for VSC's. As such officers currently consider these issues to form reasons for refusal.
81. Should the application be minded for approval officers would seek to secure the GP consulting room facilities and the provision of a GP for the lifetime of the development. This is set out in the Heads of Terms.

Housing Need – extra care provision

82. Policy CSP7 requires proposals to contain an appropriate mix of dwellings in accordance with current identified needs. The Council's evidence base includes a Strategic Housing Market Assessment 2015 and its 2018 update. More specific to this application, Policy CSP7 states that the Council will encourage the provision of housing for the elderly and for people with special needs, where appropriate whilst avoiding an undue concentration in any location.
83. CS policy CSP8 directly engages with Extra Care Housing and sets out what should be considered. The Tandridge District Housing Strategy also recognises the need for sheltered accommodation for older people within the District, focusing on those in real need of support. Its strategic approach includes focusing and improving sheltered housing in five key areas: Warlingham, Caterham Hill/Valley, Oxted/Hurst Green, Godstone/Bletchingley and Lingfield/Dormansland.
84. CS Policy CSP7 encourages the provision of housing for the elderly where appropriate, whilst policy CSP8 directly engages with Extra Care Housing and sets out what should be considered. The Tandridge District Housing Strategy also recognises the need for sheltered accommodation for older people within the District, focusing on those in real need of support. Its strategic approach includes focusing and improving sheltered housing in five key areas: Warlingham, Caterham Hill/Valley, Oxted/Hurst Green, Godstone/Bletchingley and Lingfield/Dormansland. TDC's emerging Local Plan 2033 includes policy TLP14 (Specialist Need Housing and Extra Care) and the provision of some extra care is enabled through site allocation in an area where there is a recognised need, as well as supporting the provision of additional units where they can be demonstrated to be appropriate. An important element contained in the Local Plan 2033 is the need for extra care to be sustainable by virtue of its location.
85. Surrey County Council has published commissioning statements at borough and district level to assist developers, care providers and local planning authorities on the strategic direction, minimal development expectations and future needs for extra care housing. The Commissioning Statement for Tandridge (April 2019 onwards) states that development proposals for extra care should demonstrate the level of accessibility to local facilities through a choice of accessible transport options and to be in a location that would not face any barriers to leaving the setting or returning to it (such as being located on a hill or other gradients which would present challenges to people who have difficulties walking or who use wheelchairs). The location of housing is a key

consideration for older people and factors to consider include proximity to good public transport, local amenities, health services and town centres. The setting should not only enable people to create a new community with their new neighbours on-site, but the setting should be sympathetic and supportive of people maintaining their links with the wider community.

86. The application site lies to the south of the rural settlement of Lingfield in the south-east of the District. The site sits wholly within Green Belt land. Lingfield is categorised as a Larger Rural Settlement and a Category 2 Settlement.
87. As set out in the Principle of Development (above), the spatial strategy, within our emerging Local Plan, directs development towards TDCs Tier 1 and Tier 2 Settlements. As such the Local Plan 2033 has proposed the allocation of land within or abutting Lingfield's settlement boundaries. Tier 1 of the hierarchy comprises our most sustainable settlements whilst the Tier 2 settlements are identified as being able to demonstrate good levels of service provision and access to facilities (shops, primary education, community facilities and access to local health care).
88. Officers are satisfied that the proposal is within a C2 Use Class as set out in the Principle of Development. However, there are concerns about sustainability. It is the case the Development Plan has not identified this site as a suitable location for housing.
89. Officers consider that this mono-tenure development will fail to contribute successfully with surrounding development and will create a transient community due to the short term lease structure of the development (serving residents aged 70 and above).
90. Therefore officers do not consider this site to be located in an appropriate location for the proposed C2 development as it would be contrary to the settlement hierarchy laid out within the Development Plan and fails to support sustainable development.

Affordable Housing

91. The affordable housing provision will need to be set in the context of national and local planning guidance. Policy CSP4 of the Core Strategy states, the Council will require that a proportion of new dwellings built in the District will be affordable, to be available to people on lower incomes, unable to afford housing at the prevailing market price or who need to live within the District.
92. The NPPF 2021 describes affordable housing as 'housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers), and which complies with one or more of the following definitions':
93. The accompanying PPS indicates that the scheme falls within Use Class C2 and as such is not expected to contribute towards affordable housing provision.
94. Use Class C2 (Residential Institutions) relates to the provision of residential accommodation and care to people in need of care. It includes hospitals, nursing homes, residential schools or training colleges. In contrast, the dwellings proposed can be used as independent dwellings where occupants will have their own front door and private facilities. The occupants are free to engage or not with the other facilities available, much like they would in any

settlement, provided they meet the age restriction and purchase a mandatory 2 hours per week care. They will be liable for council tax in the same way as a C3 dwelling house and the dwellings count towards housing supply in the district, as a C3 dwelling house would too. It is therefore the expectation that this proposal should include up to 34% onsite affordable housing and in its current form does not meet the requirements of policy CSP4.

95. The application is accompanied by a Financial Viability Assessment (FVA) prepared by Newsteer. The LPA appointed BNP Paribas (BNPP) to independently review the FVA and advise the LPA on its robustness, and thus on whether the proposed development is securing the maximum reasonable amount of affordable housing.
96. The proposed development would provide 0% (nil) affordable housing at a tenure split. This does not represent a policy compliant quantum and therefore, Policy CSP4 indicates that the actual provision will be negotiated on a site-by-site basis after taking into account market and site conditions.
97. In its review BNPP highlight that the Newsteer FVA has concluded that the proposed development with 100% private housing generates a deficit of -£3,619,434 against their claimed viability benchmark. Therefore, BNPP have undertaken an assessment of the proposed Development with 100% private housing. Taking into account of the following recommended amendments:
 - Request additional information in relation to the revenue lines within the DCF;
 - Recommend that should the Council have concerns regarding the construction costs, a Cost
 - Consultant is instructed to undertake a review of the itemised cost plan (currently not provided by the Applicant);
 - Request additional information in relation to Empty (Void) Property Costs;
 - Reduce profit level to reflect the risk profile of the scheme; and
 - Adjust the programme timetable to reflect current market expectations.
98. BNPP has concluded that the proposed Development with 100% private housing generates a deficit of -£1,136,032 against the viability benchmark. BNPP's conclusion was provided on a strictly 'without prejudice' and 'subject to confirmation' basis pending receipt of the information requested. Further discussion with BNPP since this issuing of its report has highlighted that there has been an increase in build costs and the costs outlined by the applicant appear within a reasonable range. BNPP has recommended that the Council include both early and late-stage review mechanisms to be captured within a Section 106 Agreement.
99. It is the case that the applicant has demonstrated that the scheme is not able to provide any on-site affordable housing and that this is the maximum reasonable amount of affordable housing. Should the scheme be minded for approval officers would support an early and late-stage review mechanism, which has the potential capture contributions to affordable housing where there are significant changes in costs or uplifts in values.

Character and Appearance

100. The NPPF states that good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people. Planning decisions should aim to ensure that developments add to the overall quality of the area; respond to local character; reflect the identity of local surroundings and materials; are visually attractive as a result of good architecture and appropriate landscaping. Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.
101. 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.
102. 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.
103. Policy CSP21 of the Tandridge District Core Strategy 2008 advises that the character and distinctiveness of the Districts landscapes and countryside will be protected for their own sake and that new development will be required to conserve and enhance landscape character.
104. Paragraph 40 of the National Design Guide stipulates that “well designed new development responds positively to the features of site itself and the surrounding context beyond the site boundary.” Paragraph 49 also states that the “identity or character of a place comes from the way buildings, streets, spaces, landscape and infrastructure combine together and how people experience them. Furthermore, paragraph 51 advises that local identity is made up of typical characteristics such as the pattern of housing, and special feature that are distinct from their surroundings. Paragraph 52 articulates that this includes considering the composition of street scenes, individual buildings and their elements and the height, scale, massing and relationships between buildings.

Access and Layout

105. The proposed development site area is roughly rectangular, with the longest edge of the site (eastern edge) facing onto East Grinstead Road. Two vehicular access and egress points would be located to the east onto East Grinstead Road. A separate footpath for pedestrians is proposed in the north-east corner, to allow for a new route to the north into the settlement of Lingfield. The main internal road curves through the site in a C-shape and allows access to the three main clusters of buildings. Due to the orientation of the buildings, direct access to the main entrances of the buildings from the internal road would be maintained.
106. The foci of activity would be directed towards Lingfield House (also referred to as the Main House), which would house a number of key functions to include:

- Multi-function room;
 - Commercial kitchen;
 - Sitting room;
 - Living / dining room;
 - Library;
 - Gym;
 - Hydrotherapy pool;
 - 6 x Guest suites; and,
 - Staff area.
107. To the north of Lingfield House is the Mortar communal building which would house 3 x consulting rooms and reception area, a community fridge, store, staff room, kitchen and WC.
108. There are 11 x three storey residential blocks located in the grounds, concentrated to the west of the site. In the south-west edge of the site are three terraced rows of cottages, two storeys in height.
109. At present the site presents itself as a large undeveloped site which acts as a clear area of relief between the rural settlement of Lingfield and Jacksbridge Farm further to the south. Whilst there is presently a large family house (and associated residential paraphernalia) on the site, this appears relatively modest when compared to the extensive grounds it sits within.
110. The proposal to infill a large proportion of this area introduces a tendril of development latching onto the cluster of buildings further south. This would form a ribbon of development to the south, creating a notable sprawl from the settlement boundary. The development proposal raises a number of questions about the resulting function of the undeveloped land to the north of the site, the land has a width of approximately 35 metres at its greatest depth (from north to south). No details of masterplanning or engagement with landowners about this land appear to have been held. Whilst it is acknowledged that the area to the north of the site sits outside the control of the applicant, this is a large-scale major application in Green Belt and a joined-up approach should be taken to manage the sprawl of development in this location. The application has not demonstrated if there has been any engagement with landowners to the north and how the development would respond.
111. An undeveloped amenity area is located to the south-east of the site, this area is 8 metres lower than the main house. The main road and the southern road access is located at this point. Officer have concerns about the layout of the blocks to the south and their likely visibility.

Massing, scale, form, and height

112. The land within the site gently slopes downwards from east to west, a level change of 4 metres. From north to south, the details within the application indicate that there is a 8.5 metre level difference in the site from the highest point close to the house and the lowest point is on the southern edge of the site.
113. Lingfield House is prominently located within the north-eastern corner of the site. The existing building dates from the late-Victorian era, it is multifaceted with a number of gables and the height is between one and three storeys (this includes the accommodation within the roof)..

114. As indicated above, Lingfield House is between 1 and 3 storeys in height and the building is a unique building within the locality. The predominant heights are displayed within development to the north of the site (Drivers Mead and Lincolns Mead) at between 1 and 2 storeys.
115. The proposed new buildings have been relatively evenly laid out across the site in a rough grid formation, the exception being a landscaped amenity area, in the south-eastern part of the site. This corner of the site is regarded as a visible area of the site from the main road. Notably the boundary comprises a deciduous hedge (or hedgerow) and it is evident that in the past year it has been allowed to grow taller. During the winter months the site is likely to be highly visible (as seen on Google Streetview), particularly in views from the main road looking north and west and the buildings are expected to be visible. Officers note that a visibility splay is required to allow for safe access and egress and that this would result in the loss of vegetation on this boundary. There is concern about the prominence and visibility of the development as a result.
116. It is noted that the applicant describes the buildings at 1.5 and 2.5 storey houses, it is understood that this is the case due to the way upper floor windows are partially set within the roofs. Officers have looked at the heights and compared this to other two and three storey buildings permitted by the LPA. It is regarded that generally, these buildings are akin to the heights of an average two and three bedroom dwelling. Therefore officers will refer to these buildings accordingly.
117. The buildings of the greatest height (3 storeys) and scale (namely Parker, Stanley, Donald and Allen buildings) have been concentrated to north-west of the site. The applicant has relied on this lower position to reduce the visual dominance of the buildings from the main road to the east of the site. The aforementioned buildings have been placed in the north-west as they would be less visible and there are no key walking routes or vantage points to view the site from the west of the development. However, it is evident occupiers of land in the immediate surrounds of the site and users of informal walking routes would feel the presence of the development and note the impact on the openness of the Green Belt. When viewed from the north and north-west, these buildings will very much appear as three-storey buildings. The properties that are likely to note the presence of this development are at:
- 20 properties at nos 1 – 20 Drivers Mead;
 - two properties at 101 and 103 Lincolns Mead; and,
 - Jackbridge Farm: which is understood to contain nos 1 and 2 Ivy Cottages and the White House.
118. A collection of six buildings referred to as the Sky Bridge Buildings (Cessili, Dorothy and Rita buildings) are placed at the centre of the site. Whilst the application refers to them as three buildings, officers are of the view that they would in fact be six buildings built in pairs and linked by a two-storey sky bridge. The bridges would be glazed and wrapped in metal fins/rills. Whilst the bridge may be functional, it would present as a rather dominant feature which encloses the site. The presence of the two-storey bridges, creates a visual block, and prevents views and a feeling of openness through the site. If arranged more thoughtfully, with better orientated buildings of a lesser scale, it may have been

possible to support a greater sense of openness and forge better links with the surrounding rural Green Belt landscape.

119. In regards to the massing, scale, form and height, it is considered that the proposal will present as a dominant development, with limited breaks between the buildings to give relief from the built form. It is noted that gable features have been added to a number of the buildings. However, on a number of the key elevations (front and rear elevations of Parker, Stanley, Donald and Allen buildings) only a single gable has been added to try and detract from the scale of the buildings. Therefore, the remainder of these buildings appears rather flat. Officers are concerned that not enough architectural ingenuity has been employed to break up the massing in this instance.

Architecture

120. Architecturally the materials for the buildings are encouraging. The palette of materials has been set out within the accompanying Design and Access Statement, prepared by Collado Collins Architects. The materials include clay tile and rusticated red brick with varying tones which is reflective of local vernacular. The contrasting modern and robust materials such as the coloured zinc cladding for the dormers are supported. Officers note that attention has been paid to include window reveals and wrap around windows, this does allow for some shadow which is positive, although this does not overcome the concerns about the wider massing issues identified above.
121. There is concern about the positioning of some of the material finishes in relation to the site context. It is the case the Mortar Community Building, has an agrarian design and this style has been positioned alongside Lingfield House. It is also the case that the buildings furthest west, proposed to face the open Green Belt appear to be typically domestic buildings. This therefore raises some questions about the appropriateness of the buildings in relation to agricultural and rural context. It is officers opinion that a more agrarian style would be suitable furthest west and the more residential buildings, which are more reflective of Lingfield House and the settlement to the north should be placed further to the east.
122. Overall, it is considered that the proposal would fail to make a positive contribution to the open rural character due to its design, excessive scale, height and massing that would result in a cramped and overdeveloped site.
123. For the above reasons the proposal would therefore be contrary to Policy DP7 of the Tandridge Local Plan: Part 2 – Detailed Policies and Policy CSP18 of the Core Strategy.

Residential Amenity

124. Policy CSP18 of the Core Strategy advises that development must not significantly harm the amenities of the occupiers of neighbouring properties by reason of overlooking, overshadowing, visual intrusion, noise, traffic and any adverse effect. Criteria 6-9 of Policy DP7 of the Local Plan Part 2: Detailed Policies seek also to safeguard amenity, including minimum privacy distances that will be applied to new development proposals.
125. The above policies reflect the guidance at Paragraph 130 of the NPPF, which seeks amongst other things to 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 of development.

126. Given the separation of the site from adjoining residential buildings it is not considered that there would be an undue harmful impact with respect to daylight, sunlight, privacy or outlook.
127. Noise and disturbance is also a material consideration and Officers have also consulted TDC's environmental Health Team. The response advises the inclusion of the following conditions, should the application be minded for approval:
 - Implementation of the measures in the lighting strategy report and adherence to the requirements of the Institute of Lighting Professionals Guidance Notes for the Reduction of Obtrusive Light;
 - Dust control measures during construction.
 - Hours of construction to be limited.
128. Officers are mindful of the noise generated from aircraft. London Gatwick Airport has flight paths, for at least some of the time that operate above the site. Officers have not seen any particular reference to mitigating the impact of aircraft noise within the application.
129. It is the case that officers do not consider there to be sufficient information to demonstrate the application site will sufficiently respond to noise from aircraft. Therefore, this forms a reason for refusal.

Parking Provision and Highway Safety

130. The NPPF 2021 states that local planning authorities should support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport, and that developments should be located where practical to give priority to pedestrian and cycle movements, and have access to high quality public transport facilities. The NPPF does, however, recognise that opportunities to maximise sustainable transport solutions will vary from urban to rural areas.
131. CS Policy CSP1 states that in order to promote sustainable patterns of travel, and in order to make the best use of previously developed land, development will take place within the existing built-up areas of the District and be located where there is a choice of mode of transport available and where the distance to travel to services is minimised. CS Policy CSP12 advises that new development proposals should have regard to adopted highway design standards and vehicle/other parking standards. Criterion 3 of Policy DP7 of the Local Plan also requires new development to have regard to adopted parking standards and Policy DP5 seeks to ensure that development does not impact highway safety.
132. The application is supported by a Transport Assessment, and a Transport Assessment prepared by Motion dated 7 April 2022.
133. The proposal has been referred to the Surrey County Council Highways Team which has considered highways and transport issues. Key details of the response are referred to throughout the following assessment.

Access and Layout

134. The Transport Assessment indicates that vehicular access and egress would be maintained from East Grinstead Road from two locations in the north-east and south-east of the site. The existing 'northern access' aligns with Lingfield House and would be widened to 5.5 metres. The proposed 'southern access' (close to the site of a telephone mast on the eastern side of East Grinstead Road) would measure 5.5 metres in width. The widths of these access points means that two cars would be able to pass one another. The County Highways Team note that to achieve the visibility splays for the proposed access the embankment adjacent to East Grinstead Road will need to be regraded and a number of highway trees removed for which the County Council will require a full Capital Asset Value of Amenity Trees value payment.
135. An internal road loops around the site and provides access the front of each property with associated car parking, cycle parking stores and bin stores throughout the site, the arrangement of the internal road appears to provide suitable access for residents and service vehicles.
136. At present there is no safe walking route from the site into the settlement of Lingfield. It is proposed to introduce a new pavement on both sides of the road to link to the pavement in the settlement boundary. This means that users of the development would be able to walk to the settlement of Lingfield from the north of the site. The inclusion of a pavement would mean that there would be a distance of 250 metres to the retail centre of Lingfield.
137. The County Highways team note that there are currently bus stops located approximately 160 m from the site outside Lingfield doctors surgery serving routes 236 and route 409 which offers an hourly service on weekdays and two hourly at weekends between East Grinstead and Selsdon. These bus stops offer very little in the way of facilities and improvements are not possible due to the limited width of the footway. The proposal therefore provides two new bus stops with shelters, accessible kerbing, seating, lighting and real time passenger information close to the development with a new 2m wide pedestrian island to connect the two stops. Additional services can be accessed along the High Street approximately 300 m north of the site.
138. Lingfield railway station is located approximately 1.2 km north east of the site (a 15 minute walk or a 5 minute cycle ride) with services every 30 minutes to East Grinstead and London Victoria. The proposals include on-site transportation in the form of an electric minibus which can be booked by residents for trips to the supermarket, hospital appointments when required and offers an alternative to the private car.

Proposed Trip Generation

139. An assessment of the likely trip traffic generation has been carried out using the TRICS database, which shows that the total trips for the independent living units and doctors consulting rooms would result in 21 two-way trips in the am peak hour and 32 two-way trips in the pm peak. Due to the nature of the proposed development the peak periods for arrivals/departures are not within the typical network peak periods of 8-9 am and 5-6 pm and therefore fall outside of these times.
140. The County Highways team do not consider that the development would result in an increase in vehicle movements on the local road network within the peak

periods. It is not considered that the development would have a significant impact on the local road network.

141. Officers therefore do not consider that there would be significant adverse impacts on the highway in regards to trip generation.

Servicing

142. The County Highway team has considered servicing. It notes that all servicing (deliveries and refuse collection) will take place within the site and swept path analysis has been provided demonstrating that a refuse and delivery vehicle can turn within the site and exit both access points in forward gear.
143. Emergency access to the site will be taken from East Grinstead Road via both access points and a swept path analysis demonstrates a fire appliance can access the site in forward gear and negotiate the internal access road and exit the site in forward gear via both accesses.
144. Therefore the servicing arrangements are deemed to be acceptable.

Highway Safety

East Grinstead Road is a two-way single carriageway road subject to a 40 miles per hour speed limit outside of the site. The speed limit changes to 30 miles per hour approximately 65 metres north of the site, as East Grinstead Road enters the centre of Lingfield.

Parking provision

145. It is proposed to provide a total of 145 parking spaces on-site for residents, staff and visitors with 9 of these spaces designated as disabled and accords with Tandridge parking standards and is considered sufficient to the Highway Authority.

Cycle parking provision

146. Provision for 60 cycle parking spaces and 6 mobility scooter spaces is made across the site within the ground floor of residential blocks or as separate outbuildings. The storage appears to be suitably secure and undercover. The applicant has stated that the use of the storage will be monitored, with the number of spaces increased if necessary. Officers consider that there is sufficient provision for cycle parking.

Construction phase

147. County Highways has reviewed the accompanying Construction Transport Management Plan (CTMP). While a CTMP has been provided, it is considered that revisions are required. Specifically the CTMP should ensure that no construction traffic is to use/cross Jacks Bridge which is 200-300 m south of the site along East Grinstead Road. The bridge doesn't have a signed weight restriction however, it has not passed the 40t assessment and therefore a routing plan will need to be provided to avoid it. A condition is therefore recommended to secure a suitable alternative route which the applicant will need to abide by.

148. County Highways recommend the following, if the application is minded for approval – the conditions are available to review in full at the end of this report. Officers have removed a condition for a S278 agreement and consider that this is better secured within a Section 106 Agreement. A further head of term for a travel plan monitoring fee is also recommended by County highways, also to be applied if the application is minded for approval.
149. Summary of recommended conditions:
- The development shall be commenced unless and until the proposed vehicular access to East Grinstead Road has been constructed and provided.
 - No occupation of the development unless and until the proposed modified southern vehicular access to East Grinstead Road has been constructed
 - Parking to be laid out in accordance with the approved plans
 - Cycle and mobility parking details
 - Electric Vehicle charging points
 - Adherence to Travel Plan
 - revised Construction Transport Management Plan
150. Section 106 Heads of Terms:
- Travel Plan monitoring fee contribution of £6,150.
 - S278 Agreement for the following:
 - I. A 2m wide footway to be provided on the western side of East Grinstead Road connecting the southern site access to the existing footway at Drivers Mead.
 - II. A 2 m wide footway on the eastern side of East Grinstead Road to connect to the existing footway to the north of Orchard Court Care Home,
 - III. The existing footway to the north of Drivers Mead along the western side of East Grinstead Road to be widened to 2m and tactile paving to be provided across the junction of Drivers Mead.
 - IV. The provision of a pedestrian refuge island across East Grinstead Road to measure 2m in width and provided with dropped crossings and tactile paving.
 - V. Relocation of the 40/30 mph speed limit signs to a position to be agreed with Highway Authority and subject to TRO approval.
 - VI. The provision of new bus stops on the eastern and western side of East Grinstead Road, both to be provided with the following facilities:
 - 9m straight length of accessible kerbing at 140 mm in height
 - 23m bus cage markings and bus stop clearway
 - bus shelters with lighting and seating
 - bus flag and pole
 - Real Time Passenger Information (RTPI)
 - minimum 3m width of footway at the bus stops
151. Officers have considered the response from SCC and the information gathered on site for the assessment of the proposal. Overall, it is considered that the increase in residential units from the development would increase vehicular movements in the locality. However, this is not considered to cause significant harm.

152. Officers do have concerns about the sustainability of the site, given the reliance on cars and the limited public transport accessibility. These have been assessed more generally under the considerations for the sustainability of the proposal.
153. In regards to highway safety and parking it is assessed that the proposal would have an acceptable impact, provided that the aforementioned conditions and heads of terms are secured, if the application is minded for approval. Therefore, the proposal with respect to highway safety and parking is considered to comply with the provisions of Core Strategy Policy CSP12 and Local Plan Policies DP5 and DP7.

Flood Risk Management

154. One of the twelve land-use planning principles contained in the NPPF and to underpin plan-making and decision-taking relates to taking full account of flood risk. Paragraph 159 of the NPPF advises that; 'Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere'.
155. Policy DP21 of the Tandridge District Local Plan Part 2: Detailed Policies 2014 advises that proposals should seek to secure opportunities to reduce both the cause and impact of flooding. Development proposals within Flood Risk Zones 2 and 3 or on sites of 1 hectare or greater in zone 1 will only be permitted where, inter alia, the sequential test and, where appropriate, exception tests of the NPPF have been applied and passed and that it is demonstrated through a Flood Risk Assessment (FRA) that the proposal would, where practicable, reduce flood risk both to and from the development or at least be risk neutral.
156. The impact of climate change on the global environment is recognised and flooding from surface water runoff is one of the main consequences. The planning system is expected to play a critical role in combating the effects of climate change by pursuing sustainable development and use of Sustainable Urban Drainage Systems.
157. The application is accompanied by a 'Drainage Strategy' and a 'Flood Risk Assessment' (FRA), both prepared by Apex Consulting Engineers and dated March 2022.
158. The Environment Agency flood risk maps have been reviewed as part of this assessment. The Site is regarded to be at 'Very Low Risk' in relation to flooding from 'rivers and the sea' and 'surface water'.
159. The Lead Local Flood Authority (LLFA) has reviewed the submitted Drainage Strategy and FRA. Initially the LLFA was not satisfied with the proposed drainage scheme, due to concerns about the attenuation area and calculation, discharge of surface water, and the pipework to the proposed ditch outfall. In response the applicant updated the Drainage Strategy and the LLFA was reconsulted. The LLFA is now satisfied that the proposed drainage scheme meets the requirements set out in the aforementioned documents and are content with the development proposed.

160. The Environment Agency was also consulted regarding the application and conforms that it has no comment based on the assumption that the proposal uses mains drainage.
161. Should planning permission be granted, the LLFA advises a suitably worded condition is applied to ensure that the SuDS Scheme is properly implemented and maintained throughout the lifetime of the development. Furthermore, a condition is recommended for a verification report to ensure the approved SuDS scheme has been implemented. Furthermore an informative regarding the impact on the ordinary watercourse. Officers are supportive of the proposed condition and informative, this has been recommended if the application is minded for approval.
162. Officers are satisfied that the application is acceptable in relation to flooding provided that the aforementioned conditions and informatives are applied to any decision, if the application is minded for approval.

Landscaping and Trees

163. Policy CSP18 of the Core Strategy required that development must have regard to the topography of the site, important trees and groups of trees and other important features that need to be retained. Criterion 13 of the Local Plan Policy DP7 required that where trees are present on a proposed development site, a landscaping scheme should be submitted alongside the planning application which makes the provision for retention of existing trees that are important by virtue of their significance within the local landscape.
164. The Tandridge Trees and Soft landscaping SPD (2017) outlines the importance of landscaping which applies to urban and rural areas and advises that it is 'essential that the design of the spaces around building is given the same level of consideration from the outset as the design of building themselves'. Trees are not only a landscape environmental benefit but, as the SPD outlines, a health benefit for people which enhances their environment.
165. The application is supported by the following documents:
 - Landscape and Visual Appraisal, prepared by the Landscape Partnership, dated March 2022;
 - Landscape Strategy;
 - Landscape Statement, prepared by Andy Sturgeon Design, dated March 2022
 - Landscape General Arrangement Plan;
 - Landscape and Environmental Management Plan; and,
 - Arboricultural Impact Assessment and Tree Survey.

Landscaping

166. The existing landscape is described in the Landscape Statement as 'the existing Lingfield House with formal gardens' and 'open grassland with hedgerows and tree belts'. It is intended to retain much of the existing formal gardens and it is proposed that improvements would be made to increase planting diversity and the creation of communal allotments. The new residential blocks would be placed within the existing grassland areas.



Proposed Masterplan – excerpt from Landscape Statement.

167. Officers are of the view that the landscape vision has evolved unharmoniously with the sensitive Green Belt location. Rather than being landscape-led, it is evident that the landscape proposal is reactive to a fixed build form and layout. It appears that preference has been given to give greater relief around Lingfield House, notably by the surrounding ornate landscape and the meadow area (south-east corner of the site). The preference for more open landscaping around Lingfield House appears to serve the amenity of future residents within the interior of the site and the meadow area, attempts to reduce the view of the development from the main road. The remainder of the site contains a more dense built form, with no significant breaks between buildings. Due to the even spread of the proposed built form the site and the limited breaks between the buildings, it is not considered that enough priority has been given to preserve the openness of the Green Belt. This view is demonstrated by the narrow corridor depicted as 'visual link to the countryside' on the Proposed Masterplan (shown above) within the Landscape Statement. The visual link is an insignificant area, providing a snapshot to the rural landscape beyond. As such officers do not consider there to be an appropriate vista relating to the surrounding rural landscape within the Green Belt.
168. Officers therefore consider that the proposal fails to provide a landscape led scheme that that prioritises the openness of the Green Belt and consider it to be at odds with the surrounding rural landscape.
169. It is noted that should the application be minded for approval that TDC's Tree Officer has recommended a condition for details of soft landscaping. Should the application be minded for approval, officers support the inclusion of this condition.

Trees

170. TDC's Principal Tree Officer has reviewed the proposal and notes that there is a strong mix of mature landscape trees and early mature specimens that have significant future potential. It is also noted that there are a total of 74 individual trees surveyed, 28 group of trees and 27 hedge elements.
171. The Tree Officer highlights that the submitted arboricultural impact assessment indicates that the construction of the proposal would require the removal of 23 individual trees, 12 full groups of trees, 4 partial groups, and 12 hedge sections. The large majority of the trees of landscape significance are to be retained. In this instance the Tree Officer is less concerned about the relative BS5837 categorisation of trees to be removed, as the focus should be on landscape impact. In that sense the impact will be moderately negative in the short term, particularly with the removal of trees T57-T62 on the frontage, required for the formation of a visibility splay for the proposed new access.
172. The vegetation losses will be mitigated and compensated for in the medium and long term, however, with the extensive tree, hedge and shrub planting proposed throughout. A total of 122 semi mature trees are proposed for planting, and a diverse mix of native and non-native trees are indicated giving a high level of biodiversity value, climate change and pest and disease resilience. Significant ecology and biodiversity enhancements are also proposed throughout the site, and in particular in the areas currently set to pasture.
173. There are several areas where the root protection areas of retained trees are encroached, and whilst only the principle of mitigation is shown on the submitted tree protection plan and within the submitted report, I am satisfied that the works can be achieved without significant harm to retained trees, albeit much more technical detailed information would be required under condition should you be minded to grant consent.
174. The Tree Officer has requested a condition for hard and soft landscaping details and
175. The development is therefore considered to have an acceptable impact on the ancient woodland and protected trees thus the development would comply with Policies CSP18 and DP7.
176. For the reasons above, the proposal would be contrary to Local Plan Policy DP7 and Core Strategy Policy CSP18. For these reasons, officers cannot support the proposal on landscaping grounds.

Energy / Sustainability

177. Policy CSP14 requires the reduction of carbon dioxide (CO₂) emissions by means of on-site renewable energy technology. For schemes of more than ten dwellings a 20% saving in CO₂. Development over 5000m² is expected to incorporate combined heat and power or similar technology.
178. The application is accompanied by an Energy and Sustainability Statement (ESS), prepared by Hoare Lea, dated 6 April 2022.
179. The ESS indicates that the proposal would achieve up to a 53.7% sitewide reduction in CO₂ emissions beyond the Building Regulations Part L 2013

'baseline' (using SAP 10 carbon factors) prior to the consideration of low or zero carbon technologies. This is achieved due to passive design and energy efficiency. Whilst the proposed reductions in CO₂ are considered to be positive, it is the case that Policy CSP14 specifically requires a 20% reduction in CO₂ from renewables. The ESS indicates the proposal would include roof mounted photovoltaic panels (south-east facing) to produce 55.5 kWp of energy as well as air source heat pumps. However, in total it is understood that there would be a 7.4% reduction in CO₂ from renewables which falls significantly below the policy requirement. Officers are satisfied that the proposed CO₂ savings would exceed the minimum policy position.

180. While there is deviation from Policy in relation to the CO₂ reductions from renewables, officers do not consider this to be grounds for refusal. To ensure that the appropriate carbon emissions savings are achieved, it is considered necessary to impose a condition. Should the application be minded for approval, a condition requiring the submission of further information relating to renewable energy technology implementation is recommended by officers.

Biodiversity

181. Section 15 (paragraphs 174 - 188) of the NPPF speaks of the need to conserve and enhance the natural and local environment. Developments that conserve or enhance biodiversity should be supported. Development proposals are required to minimise impacts on and providing net gains for biodiversity.
182. CS Policy CSP17 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.
183. LP Policy DP19 advises 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.
184. The current site is largely undeveloped and contains mature landscaped grounds, and the field set to pasture beyond.
185. In regards to biodiversity and ecology impacts, Surrey Wildlife Trust (SWT) were consulted.

Biodiversity net gain

186. SWT have indicated that the submitted biodiversity net gain report which includes the metric assessment is acceptable. SWT confirm that this shows that the trading rules have been satisfied, and that a biodiversity net gain is achievable for the project. The success of the proposal would be dependent upon the creation and management of habitats, in line with the assessment carried out. We note that a Landscape and Environmental Management Plan has been submitted, and this document does appear to be suitable.

Protected species

187. In regards to bats SWT have noted that *“the Extended Phase 1 Habitat and Habitat Suitability Index (HSI) Survey (Greenspace Ecology, 2017) states that 1000+ bat droppings were recorded in Building B1 – indicating the presence of a long-eared roost. A single bat was also recorded in the building. Building B2 was assessed to have negligible suitability to support a bat roost in 2017. The numbering of the Phase 1 habitat map for buildings does not appear to be accurate as B2 is the larger building and B1 the smaller building”*.
188. In response the applicant has provided further information to SWT. SWT have reviewed that information and advise:
189. “We note that good practice principles and design have been embedded into the project as part of the proposal, as outlined in the response note. In conclusion of this point, we would advise that the Applicant is required to carry out the development in line with these measures recommended and provided by Greenspace Ecological Solutions Ltd.”
190. As a precautionary approach, SWT advise that the felling of trees is carried out under the supervision of an ecological clerk of works. The ecological clerk of works would carry out a pre-felling inspection to ensure that the activity is in line with the legislation afforded to species such as bats (and birds). Officer would be able to include an informative to bring this to the attention of the developer.
191. Overall in terms of the impact on biodiversity the proposal is deemed to be acceptable.

Very Special Circumstances

192. As discussed above, it is considered that the proposed development would comprise inappropriate development within the Green Belt which would have a greater impact on openness than existing development on the site. It has also been found that the proposed development would have a harmful impact on the character and appearance of the site and surrounding area.
193. In such circumstances, and in accordance with paragraph 147 of the NPPF, inappropriate development is, by definition, considered harmful to the Green Belt and should not be approved except in very special circumstances. Paragraph 148 of the NPPF goes on to state that when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. ‘Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.
194. The accompanying Planning Policy Statement (PPS), prepared by QED sets out 11 points which make the Applicant’s case to demonstrate VSC’s. Overall, the PPS indicates that the following VSC’s, will collectively support the three strands (economic, social and environmental) to sustainable development set out in the NPPF.
195. Officers have carefully reviewed the VSC’s and regardless of the Green Belt designation, a large-scale major development such as this would ideally be of a high quality, masterplanned and provide appropriate mitigation. Generally,

the following VSC's comprise the type of offer that would normally be expected from development proposals. Given the Green Belt designation and the need to demonstrate VSC's to outweigh any harm, officers assessed each of the VSC's put forward to support this application accordingly:

VSC ref.	VSC's suggested by the applicant / Officer Assessment
VSC1	<p>Addressing a clear and accepted need for specialist accommodation for older people in Tandridge</p> <p>A development proposal should be in a sustainable location – achieving the foundations to sustainable development as set out in the NPPF.</p>
VSC2	<p>Delivering a scheme on a site that is suitable, available and achievable for development and that is within walking distance of local services and facilities</p> <p>The proximity to Lingfield settlement and the proposed improvements to the walking routes are noted. However, this location does not adjoin the settlement and it would have negative impacts by effectively diminishing and annexing land to the north from the Green Belt.</p>
VSC3	<p>The absence of any alternative sites outside of the Green Belt that are available to meet this need</p> <p>Officers do not consider that this is the only available site in the district for the provision of homes for the elderly.</p>
VSC4	<p>Providing an exemplar development in terms of the standard of facilities and in the provision of support and care, such that the proposed will enhance the wellbeing and level of social interaction for prospective residents and offer better health outcomes</p> <p>Officers consider the design, scale, height and massing of the development to be excessive and consider that it has a poor relationship with the surrounding context.</p>
VSC5	<p>Helping to address the Council's 5-year housing land supply shortage;</p> <p>This proposal is for a single tenure development, it does not offer a mixed and balanced housing offer, a notion underpinned by the NPPF. Whilst there is a need for extra-care provision, the same great need can also be made for family housing and affordable homes.</p>
VSC6	<p>Freeing up other sectors of the housing market by releasing much-needed family housing accommodation</p> <p>It is recognised that the proposed development would potentially free up larger homes that could be occupied by families. However, it is a broad assumption to make that residents will be occupying such developments. Furthermore, it is not likely that this would have a direct impact on freeing up homes in the district as the proposed units will be sold on the open market.</p>
VSC7	<p>Improving the local healthcare infrastructure through the provision of enhanced GP capacity – In addition the applicant confirmed the offer of a full time on-site private GP for residents.</p> <p>Consulting rooms and a private GP are offered on site. The applicant has not been able to demonstrate that these facilities would tie into the local GP provision in any meaningful way. Officers have concerns about a stand-alone GP and are aware that a GP's are normally supported by a range of support in order to function. E.g practice managers, receptionists, nurses (and other health professionals).</p>
VSC8	<p>Providing community access to the shared facilities and high quality garden areas within the scheme;</p> <p>Open space is regarded to offer a number of public benefits. However, this is not a significant space and there has been no formal offer to</p>

	maintain this area as public open space in perpetuity. It is also the case that the formal gardens are located within the interior of the development and it would be hard to contain members of the public within this space. Officers therefore do not consider that this space can be of significant benefit to the wider community.
VSC9	Creating significant local employment opportunities both at the construction and operational stages, increasing spending power locally and supporting the vitality of the village centre; The offer of an employment contribution is of course welcomed. However, this is not an uncommon offer for a major development scheme where LPAs seek heads of terms to secure construction and operational jobs and training.
VSC10	Delivering highways improvements in the form of enhanced pedestrian footways and a potential new crossing on East Grinstead Road. Improvements to make proposals more sustainable are welcomed by the Development Plan. However, this application sites outside of the settlement boundary and
VSC11	Enhancing the landscaping and biodiversity potential of the site. Officers note that supporting information provides modelling to indicate that there would be improvements to the site. However, the quantum of scale and massing of the development is still considered to be excessive and harmful to the wider landscape.

196. On review of the VSP's suggested by the applicant officers are not of the view that either one of these cases individually or collectively outweigh the substantial harm to the Green Belt.
197. For the above reasons officers are of the view that the application should be refused as the proposed development would constitute inappropriate development in the Green Belt causing significant harm to the openness and visual amenities of the Green Belt. Finally, it would fail to demonstrate VSC's to outweigh the harm.

Conclusion

198. Officers are of the view that the proposal would result in inappropriate development in the Green Belt in which the applicant has failed to demonstrate 'very special circumstances'. Furthermore, the proposal be would harmful to the Green Belt openness and open countryside of the undeveloped land immediately to the north of the site. Insufficient infrastructure has been provided for this development outside of the settlement boundary and the proposal fails to provide a sustainable form of development. The proposed development would result in significant harm to the character and appearance of the area and its landscape quality. The impact of noise from aircraft has not been sufficiently demonstrated. Finally, the proposal has not been able to demonstrate that it would have an acceptable impact on bats.
199. As a result of the nature and quantum of these concerns it is recommended that planning permission is refused for the reasons set out at the end of this report.

200. 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 paragraph 218 and 219 of the NPPF. Due regard as a material consideration has been given to the NPPF and PPG in reaching this recommendation.
201. All other material considerations, including third party comments, have been considered but none are considered sufficient to change the recommendation.

RECOMMENDATION: REFUSE

Reasons for Refusal

- 1) The proposed development would constitute inappropriate development in the Green Belt causing significant harm to the openness and visual amenities of the Green Belt. No very special circumstances exist to clearly outweigh the harm by reasons of inappropriateness and other identified harm. As such, the proposal is contrary to the provisions of Policies DP10 and DP13 of the Tandridge Local Plan Part 2: Detailed Policies, and the provisions of the National Planning Policy Framework 2021 with respect to protection from built development of Green Belts.
- 2) The proposed development of the application site which is detached from the built-up area of Lingfield Village does not integrate effectively with its surroundings and, as such, would have a negative impact on the contribution to Green Belt openness and open countryside of the undeveloped land immediately to the north of the site. No very special circumstances exist to clearly outweigh the harm by reasons of inappropriateness and harm by way of the loss of contribution to open countryside of this adjoining Green Belt land. As such, the proposal is contrary to the provisions of Policy CSP18 of the Tandridge District Core Strategy and Policies DP7, DP10 and DP13 of the Tandridge Local Plan Part 2: Detailed Policies, and the provisions of the National Planning Policy Framework 2021 with respect to conserving and enhancing the natural environment.
- 3) The design, layout, height, scale and massing of the apartment blocks and cottages within the proposed development will result in a cramped and over developed site and, together with the introduction of significant areas of hard surfaced access roadways and parking areas particularly within parts of the site that are currently open paddocks, will have an urbanising effect on the site and adjoining areas of open countryside contrary to the provisions of Policy CSP18 of the Tandridge District Core Strategy and Policy DP7 of the Tandridge Local Plan Part 2: Detailed Policies.
- 4) The proposed development would constitute an unsustainable form of development, failing to meet the objectives as set out in the NPPF and resulting in a residential development reliant on the private car. As such, it would be contrary to the provisions of Policy CSP1 of the Core Strategy, DP1 of the Tandridge Local Plan Part 2 Detailed Policies and the National Planning Policy Framework 2021.

- 5) Insufficient details have been provided within the planning application to assess any proposed footway connection from the northern site access along the verge of East Grinstead Road to link with Drivers Mead to the north and, in particular, the impact construction of such a footway would have on the Corsican Pine which makes a significant and positive contribution to the appearance of the site frontage and street scene. Any such footway construction proposal is currently considered to be contrary to the provisions of Policy CSP18 of the Tandridge District Core Strategy and Policy DP7 of the Tandridge Local Plan Part 2: Detailed Policies
- 6) Insufficient details have been provided within the planning application to assess the impact of construction of the southern access into the site from East Grinstead Road and whether this will result in the increased visibility of the development from that road causing additional harm to the existing rural character of the area. As such, this aspect of the development proposal is currently considered to be contrary to the provisions of Policy CSP18 of the Tandridge District Core Strategy and Policy DP7 of the Tandridge Local Plan Part 2: Detailed Policies.
- 7) Insufficient information has been provided within the application to date to determine whether the residents of the proposed integrated care community will be exposed, either now or in the future, to unacceptable levels of noise from aircraft using Gatwick Airport and overflying Lingfield Village. As such, the development proposal is currently considered to be contrary to the provisions of Policy DP22 of the Tandridge Local Plan Part 2: Detailed Policies.
- 8) The proposed scheme makes insufficient provision for the infrastructure contributions required to offset the impacts of the future residents upon local infrastructure and is thus contrary to the provisions of Policy CSP11 of the Core Strategy and the National Planning Policy Framework 2021.
- 9) The unsustainable location of the site and lack of reliable and regular public transport would not support the provision of a care facility in this location and future residents would be largely contained to their setting. The applicant has therefore failed to demonstrate the care provision is appropriately located and would meet the needs of the district and future occupant's contrary to Policies CSP7 and CSP8 of the Core Strategy 2004 and the provisions of the National Planning Policy Framework 2021.

S106 Agreement - Heads of Terms

1. Cost undertaking for the Councils Legal services in order to prepare the Legal Agreement.
2. Occupancy restrictions to secure the proposed Class C2 Use Class including:
 - A minimum age restriction of 70 years for the primary occupant
 - The primary occupant to be in receipt of a minimum of two hours of care and support per week.
 - All residents to benefit from the use of an on-site GP – to form part of the service charge.

Full details of the suggested C2 occupancy criteria are contained at Appendix 5 of the Planning Policy Statement.

3. Approval and implementation of a detailed Travel Plan (to build on the initiatives set out in the applicant's Framework Travel Plan).
4. A monitoring fee of £6,150 to secure the agreed Travel Plan initiatives.
5. The provision of a community fridge facility (for a defined time-period and at defined hours).
6. The provision of GP consulting rooms and waiting area.
7. The funding of a private GP on a 60% FTE basis.
8. Works to facilitate the extension of the pavement from the entrance to Lingfield House to Drivers Mead as well as the widening of the existing footpath north of Drivers Mead. Tactile paving to be provided across the junction of Drivers Mead.
9. Works to secure a new pedestrian refuge island across East Grinstead Road with drop kerbs and tactile paving.
10. Works to secure a new footway on the eastern side of East Grinstead Road to connect to the existing footway to the north of Orchard Court care home.
11. Contributions to new local bus stop provision on the eastern and western side of East Grinstead Road (to include accessible kerbing, bus cage markings, bus shelters, bus flag and pole, real time passenger information and minimum 3m width footways).
12. Relocation of the 40/30mph speed limit signs to a position to be agreed with the Highways Authority.
13. A viability review mechanism to appraise whether the provision of affordable housing may become viable should sales rates exceed those envisaged in the independent viability review. As recommended in the independent review, this approach provides a balance between ensuring the scheme is viable and deliverable at the early stage and ensuring that if the scheme's viability improves, that any uplift in value is captured for the local authority.
14. A commitment to implement training opportunities to local people during the construction phase and using local suppliers where possible.