



Application: 2025/1376 and DM/26/0303

Site: Land north of Borers Arms Road, east of Copthorne Bank & south of Clay Hall Lane, Copthorne

Proposal: Outline for up to 260 dwellings (all matters reserved except access) with vehicular access from Copthorne Bank/Borers Arms Road; associated works.

Position

OBJECTION for the reasons set out below. Without prejudice, if the LPA is minded to approve, Worth Parish Council supports Sussex Police's S106 submission and requests the S106 package listed at the end of this response to mitigate impacts on Copthorne.

1) Location, settlement pattern and Green Belt context

1. The site sits on the edge of Copthorne, largely within Tandridge, with proposed access connections via Copthorne Bank and Borers Arms Road, immediately adjacent to West Sussex. The consultation material confirms up to 260 homes and depicts the indicative access arrangement.
2. The proposal would intensify development in an area that presently forms a transition to open land/Grey Belt, undermining settlement pattern and increasing pressure at a cross-boundary location. NPPF Section 13 requires that planning decisions safeguard the Grey Belt from inappropriate development and protect its purposes, notably preventing encroachment and safeguarding the countryside from sprawl.
3. Tandridge's adopted development plan continues to apply Green Belt protection and a development-plan-led approach to location/scale of growth until a new Local Plan is adopted.

Harm summary: The scheme would erode the edge-of-settlement character and Green Belt setting, contrary to NPPF Section 13 and the plan-led approach in Tandridge's adopted development plan.

2) Highways and transport safety

1. Right-turn risks on the A264: Councillors and residents have highlighted that a right-turn restriction/issue on the A264 may push traffic to route through Copthorne to reach the Brookhill Road roundabout, increasing village rat-running and collision risk. This risk is heightened by HGV activity locally and the

constrained pedestrian environment on approaches to the village.
(Resident/councillor evidence as per public representations to WPC).

2. The developer's boards show vehicular access via Copthorne Bank/Borers Arms Road—locations already sensitive for pedestrian safety and severance. Any intensification must demonstrate safe access for vehicles and pedestrians and not displace turning movements into village streets.

Ask to LPA: Require an independent road safety audit of the A264 movements and diversionary routing, with mitigation to prevent village rat-running, and robust pedestrian safety measures linked to desire lines to village services.

3) Flood risk, drainage and surface-water management

1. The site lies in the catchment that drains towards watercourses in the Upper Mole system (including Burstow Stream) which covers Copthorne; the area is subject to flood alerts from time to time. Surface-water and ordinary watercourse issues are a known local constraint.
2. Tandridge's Strategic Flood Risk Assessment (SFRA) stresses the need to apply the sequential/exception tests and to interrogate surface water and groundwater risk as well as fluvial, with site-specific FRAs required and robust SuDS that do not worsen off-site risk.
3. Community evidence indicates surface-water ponding/flooding on the fields. Since the development of Burstow Gardens the Copthorne Sports Association have advised of significant flooding on the King Georges field. Concerns have been raised that future development will exacerbate this issue further.
While the applicant appears to consider attenuation tanks, such features do not resolve underlying constraints nor guarantee no increase in downstream risk if exceedance routes and long-term maintenance are not proven.

Harm summary: Insufficient assurance against increased flood risk to Copthorne and downstream receptors, contrary to NPPF Section 14 (flood risk) and SFRA guidance for Tandridge.

4) Ecology, Biodiversity Net Gain and irreplaceable/priority habitats

1. Public representations point to species records (badgers, bats, owls, potential dormouse) and a history of unimproved grassland/meadow interest (SNCI-type characteristics). These are high-value habitats that can be irreplaceable or priority in planning terms.
2. The applicant's consultation boards promise "at least 10%" BNG; however, BNG credits or a 10% uplift cannot compensate for the loss of irreplaceable habitat. Where irreplaceable habitat is present, planning permission should only be granted in exceptional circumstances, and the 10% BNG requirement does not

apply—instead bespoke compensation is required, and impacts must be avoided from the outset.

3. DEFRA's policy and professional guidance reiterate that BNG is not a substitute for protecting irreplaceable habitats (e.g., ancient woodland/ancient trees and other listed irreplaceable), and impacts trigger stricter tests and bespoke compensation strategies.
4. The site also lies within Gatwick Airport safeguarding. Gatwick has issued a Bird Hazard Management Plan in relation to 2025/1376, underlining the need to manage landscaping/water to avoid attracting hazardous bird activity. This constraint can conflict with biodiversity and SuDS design (e.g., open water bodies), further limiting meaningful ecological mitigation.

Harm summary: The proposal risks the loss of high-value grassland and protected species habitat in a location where effective on-site mitigation is constrained by airport safeguarding and Green Belt edges. It fails NPPF Section 15 (conserving and enhancing the natural environment) and BNG/irreplaceable habitat guidance.

5) **Airport safeguarding implications**

1. Gatwick's Aerodrome Safeguarding response for 2025/1376 includes a Bird Hazard Management Plan (LGW6047), reminding the LPA that landscaping, SuDS and open water features must be designed not to increase bird strike risk. This adds design constraints and may limit wetland-type ecological mitigation touted by the scheme.

Implication: The site's proximity to the airport limits the range of habitat and SuDS solutions, undermining claims of easy ecological "net gain" through open-water or wetland creation.

6) **Community safety and healthy streets**

Residents report fear of walking along parts of the local network due to traffic incidents and narrow footways—especially north-side access with narrow pavements—which a development of this scale risks exacerbating without significant infrastructure upgrades (lighting, crossings, speed management, passive surveillance).

7) **Planning balance**

1. The applicant's material cites "up to 260 homes" with 50% affordable and generalised infrastructure promises; however, planning law requires decisions be made in accordance with the development plan unless material considerations indicate otherwise. The NPPF is a material consideration, but the harm identified above—in respect of Green Belt setting, highways safety, flood risk, airport safeguarding, and ecology/BNG compliance—is significant.

2. On ecology, reliance on statutory BNG credits or a nominal 10% net gain cannot offset loss where habitats may be irreplaceable or where on-site mitigation is constrained by airport safeguarding; the government's guidance is explicit on this point.

Conclusion: Worth Parish Council **objects**. The adverse impacts would significantly and demonstrably outweigh the asserted benefits in this sensitive cross-boundary location.

Without prejudice – Section 106 requirements if the LPA is minded to approve

WPC strongly supports the Section 106 requests submitted by Sussex Police and the Copthorne Sports Association and requires that Copthorne-focused mitigation measures are secured in full. These obligations must be proportionate to the scale of the development, clearly defined, and supported by enforceable delivery triggers to ensure that appropriate provision is made for leisure, community infrastructure, play, formal sport, and community buildings.

It is explicitly stated in the applicant's own Design and Access Statement that the development is intended to function as an extension of Copthorne, with local services and facilities presented as integral to the scheme. Despite this, the application provides no precept contributions and no Section 106 funding to compensate for the increased strain such growth will place on Copthorne's already limited infrastructure. This is unacceptable. If the development is to rely so heavily on Copthorne's identity and resources, then it must contribute fairly to the village it claims to be part of. Without secured mitigation, the proposal places a significant and unjustified burden on the existing community.

Please see quotes below from the Design and Access Statement for reference

1.03 i' In a wider context, Copthorne is the village that abuts the site boundary to the south, and it has a variety of facilities and transport links, including a primary school, Church, Parish Hub and village store - together with play areas and open spaces.'

1.03 ii 'Its location on the settlement edge, means the development is in a sustainable location with access to educational, retail, health and religious facilities. There is a parish hub and thriving youth club as well as play areas and open spaces for recreation'.

1.04 'The proposed development site provides a natural settlement extension to Copthorne, that is in turn constrained on its northern boundary by Clay Hall Lane'.

Local Community Infrastructure (LCI)

- Street-lighting upgrades on connecting streets to village services (e.g., Borers Arms Road, Copthorne Common Road, Brookhill, Newtown, Copthorne Bank,

Church Lane, Church Road) to current standards for footway safety and passive surveillance.

- CCTV/ANPR at key corridors (Shipleigh Bridge Lane, Borers Arms Road, Copthorne Common Road, Brookhill, Newtown, Copthorne Bank, Church Lane, Church Road) to deter rat-running and support community safety.
- Landscaping/creation of community space at Lashmere (walking distance to the site).
- Opening up and naturalisation of the village brook at Copthorne Village Green (a focal point for the village), with habitat enhancement and public realm improvements.
- Moveable Speed Indicator Devices (SIDs) for strategic deployment across Copthorne (locations to be agreed with WSCC/TDC).

Justification: Measures align with NPPF aims on healthy, safe communities and promoting sustainable transport, address airport-safeguarding constraints (lighting/CCTV vs open-water), and mitigate safety/severance effects of development traffic.

Play space (if applicable)

- Upgrades to playground at Copthorne Recreation Ground (Copthorne Bank) – the closest equipped play area to the site;
- Upgrades to Westway playground (within walking distance).

Formal sports (if applicable)

- Improvements at Copthorne Pavilion (building upgrades; football/cricket pitch quality works);
- MUGA capacity and facility improvements at Copthorne Recreation Ground (Copthorne Bank).

Community buildings (if applicable)

- Improvements to Copthorne community buildings, including:
 - Parish Hub, Borers Arms Road;
 - Copthorne Village Hall, Copthorne Bank.

These asks reflect WPC's community priorities and the need to support local facilities proportionate to growth.

Community representations noted by WPC

- Access via Borers Arms Road is unsuitable for pedestrians due to HGVs and narrow pavements; north-side access footways are constrained.
- Meadow/grassland quality has been degraded over the years but still supports badgers, bats, owls and dormouse activity (recent footage reported).
- Flooding/surface-water issues occur on the fields.
- Right-turn/A264 concerns risk diverting traffic through the village to Brookhill roundabout; WPC has raised this with highways.

- The site abuts a hard Green Belt boundary, limiting realistic ecological mitigation opportunities.
- BNG credits (10%) cannot replace loss of irreplaceable habitat.
- Live badger setts reported near Clay Hall Lane boundary.
- Copthorne Village association will submit a detailed response to Tandridge and Mid Sussex.

Requested conditions / information (if approved contrary to objection)

1. Highways: Pre-occupation delivery of village rat-running mitigation, pedestrian crossing upgrades, and a monitored Travel Plan with remedial funding. (Access shown via Copthorne Bank/Borers Arms Road).
2. Flood/Drainage: A detailed FRA & SuDS strategy demonstrating no increase in flood risk on- or off-site, exceedance routing, long-term management, and alignment with Tandridge SFRA.
3. Ecology/BNG: Precautionary approach to irreplaceable/priority habitats; where present, apply NPPF tests and DEFRA guidance (no reliance on standard BNG uplift), with a secured compensation strategy and 30-year management.
4. Airport safeguarding: Secure compliance with Gatwick's Bird Hazard Management Plan (LGW6047); restrict open-water SuDS that elevate bird strike risk.
5. Construction: CTMP to protect Copthorne from HGV routing, hours, and road safety impacts.