

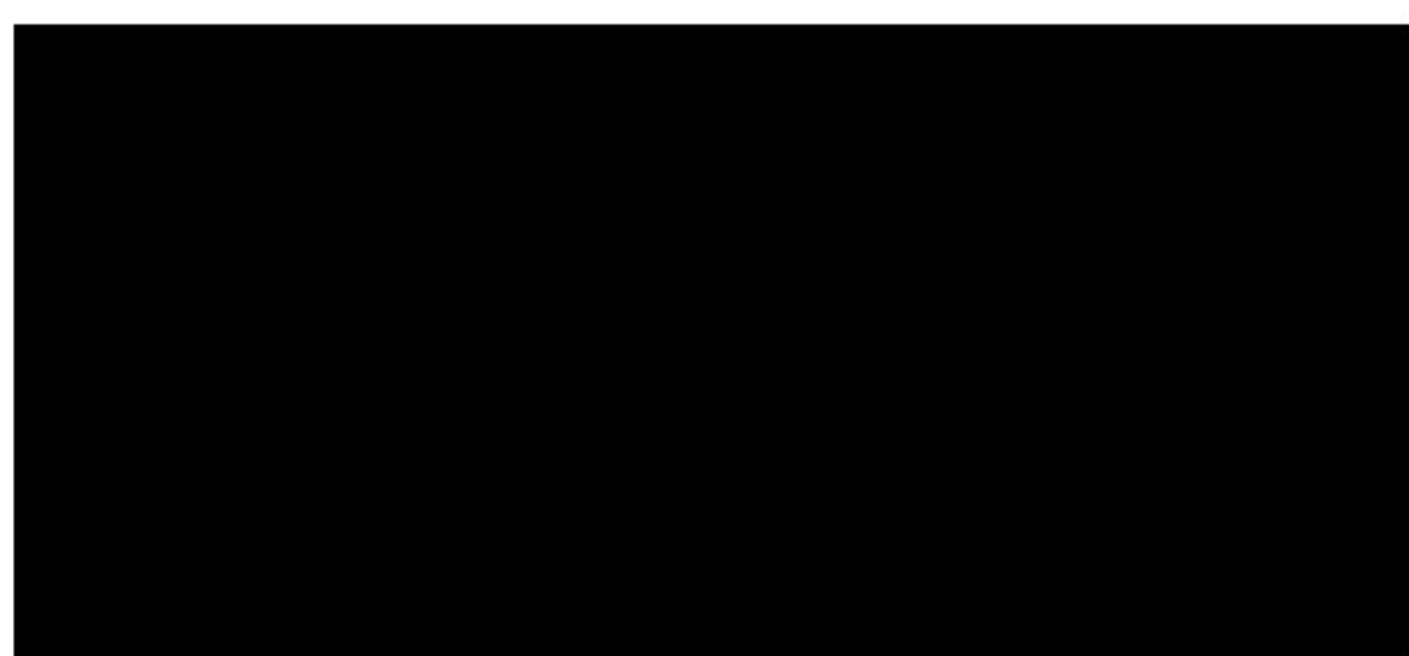
FORMAL PLANNING OBJECTION

To Tandridge District Council
And
Mid Sussex District Council

For the attention of Alda Song at Tandridge District Council by email to asong@tandridge.gov.uk
For the attention of Steven King at Mid Sussex District Council by email to steven.king@midsussex.gov.uk

RE- Application Ref: 2025/1376 at Tandridge District Council
Re- Application Ref DM/26/0303 at Mid Sussex District Council
Land North of Borers Arms Road (Copthorne Meadows)

Prepared by Peter Thomsson



Date 26th March 2026

I wish to formally object to the above planning application for the following reasons

Opening Statement

I have lived in the village of Copthorne for 35 years and before that the village of Smallfield for over 10 years so I feel I can talk from a position of having family and friends and emotional ties to both settlements.

Copthorne and Smallfield village have distinct characters, and should this application be approved I fear that both villages will merge into one and by doing so dilute the distinct character of each.

This planning application spans two District Councils with Tandridge District Council being the deciding authority. However, both councils need to view and consider the comments made or attached to this application on each council planning portal this is the only way to gauge the strength of feeling be it for or against the application of both settlements when coming to a decision.

Green Belt

The site is designated Green Belt. Under NPPF paragraph 142, the fundamental aim of Green Belt policy is to prevent urban sprawl.

Substantial weight must be given to any harm to the Green Belt.

The proposed development of up to 260 dwellings across approximately 13 hectares cannot do anything but, substantial harm to the green belt and is therefore inappropriate development.

NPPF paragraph 153 confirms that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.

The application/developer makes no attempt to justify how this application meets the criteria of “special circumstances” that would justify consideration be given to the application.

The developer makes no attempt to show or demonstrate that all reasonable alternative locations with less harmful ecological impacts have been fully examined and shown to be unsuitable.

The development therefore fails to meet the test of "special circumstances".

Unimproved meadows and site of SNCI Status

The proposed Planning Application is within an area known as "Copthorne Meadows" part of the old 'Copthorne Common'. It is not only within the Green Belt it is a "Site of Nature Conservation Interest" (SNCI).

It was noted at the time, of the classification, the meadows were of such importance that a notification of SSSI was considered.

These meadows are part of the last 10% of unimproved grassland meadows in the United Kingdom, the remaining 90% having been lost within the past 70/100 years. It contains rich grassland species and is a priority habitat under section 41 of the NERC Act 2006.

Surveys on the site have recorded over 50 species of plants of conservation interest.

Bats, breeding birds, dormice, grass snakes, adders, great crested newts' badgers, foxes, deer, hedgehogs barn owls and kestrels as well as many other invertebrates are all known to be present on the site and are at serious risk from the proposed development.

It is important to note most of the above are protected species.

Th UK is one of the most nature depleted nations in Europe it is therefore important that careful consideration must be given to any development which will deplete the UKs biodiversity even further.

Planning Permission should be refused if "significant harm to biodiversity from a development cannot be avoided..." (NPPF193(a)).

The Environment Act 2021 and Schedule 7A of the Town and Country Planning Act 1990 require a minimum 10% Biodiversity Net Gain.

The developer admits It is not possible to mitigate for the direct loss of this grassland habitat and mitigation, or compensation procedures cannot offset the loss of biodiversity. The developer is no more than stating the obvious as you cannot mitigate or replace unimproved meadows.

Therefore, the statutory requirement of a 10% Biodiversity Net Gain is not practically achievable.

Should the application be granted the UK will forfeit any right to lecture others on species or habitat conservation be it in the Amazon or Lowland gorilla habitat protection, or indeed anywhere else where nature is at risk

For having sanctioned the destruction of part of the last 10% of such important scarce habitat, (in its own backyard), how could the UK lecture others on conservation.

Coalescence

The development would go against the fundamental policy of the Green Belt prevention of the joining up of settlements in this case Copthorne and Smallfield. The application crosses the boundaries of two councils Tandridge District Council (the principal deciding authority) and Mid Sussex District Council.

The size of the development 260 houses and industrial warehousing will without doubt join up the two settlements with all the housing located in Smallfield it would mean that Copthorne has all the negative effects of road congestion/pedestrian safety/overcrowded infrastructure such as schools GPs and after school clubs, with no benefit.

It will erode the distinct character of the village and goes against the primary purpose of the Green Belt which is to prevent the merging of neighbouring towns and is one of the five key purposes of Green Belt designation, ensuring towns and villages remain distinct the Green Belt policy serves to preserve this by maintaining permanent open land between them, ensuring separate identities. It restricts development to prevent "ribbon" or "strip" development along roads and preserves the rural, open character of areas bordering built-up zones.

Ecological survey

The developer's submission incorrectly states there has been no loss of habitat from activities since January 2020, this is simply not the case, flailing has been undertaken on several occasions and somewhere I have photographic evidence to prove it.

The flailing and destruction of the habitat before the ecological survey casts doubt on the reliability of the report and it is important that the council do not rely on inaccurate information.

Such actions should not be rewarded

It is interesting to note a formal complaint on the destruction of the habitat and the destruction of protected species breeding sites has been lodged and that the council have opened a case ref: ENF/2026/44 with a level 3 priority.

This complaint should be upgraded to a higher level.

Should the council approve the application it will have done so on a flawed ecological survey and may well be left open to judicial challenge.

The ecological survey fails miserably in its duties to wildlife and to the Great Crested Newt in particular, it has failed to survey ponds within the development site and within the required catchment area.

I know this personally as one such pond (which should have been surveyed) is in my garden where we have great crested newts, this pond being within 400 meters of the proposed development. The habitat found within the site is the perfect habitat for the great crested newt, so it is highly likely that the great crested newt is breeding in the ponds within the development area.

The developers' submittals cast doubt on the abundance of wildlife; however, locals will be able to point to the exact nesting sites of many of the species identified above and will be happy to do so.

Archaeology survey

The developer's archaeology survey yet again takes a complacent and purely desk top view and downplays the potential for archaeology discovery.

The site has never been fully investigated or the ground disturbed. That is why it is SNCI status and forms part of the last 10% of unimproved meadows in the UK.

Surrey County Council, Historic Environment Planning: Archaeology department state in their correspondence ***"investigations from which a better understanding of its potential might be drawn and, therefore, that the site's potential remains unknown. Given the size of the site, its unknown archaeological potential and that groundworks associated with the proposed development will have a severe and widespread impact that will destroy any Heritage Assets of archaeological significance that may be present, further archaeological work is required. This is in accordance with the requirements of Local Plan policy DP20, and the National Planning Policy Framework (paras 207 & 218).***

Flooding

NPPF paragraph 181 requires that flood risk is not increased elsewhere and it is interesting here to note the objection by SCC - Flood Risk, Planning and Consulting Team.

The developers' flood risk assessment is woefully inadequate, understated and complacent and lacks adequate flood risk mitigation

It incorrectly states that the runoff is to the Copthorne Common ditch, when in fact it is to the Burstow Stream. If they cannot get this simple matter correct, how can we have confidence in their flood risk assessment.

It is noteworthy that Burstow has suffered and still is suffering considerable flooding, the proposed development will only exacerbate this flooding problem.

The developer has admitted that "Soakaway drainage is unlikely to be suitable for this site." But no practical alternative solutions are offered.

We have lived at Clay Hall for 35 years and in recent years have noticed a considerable increase in the flooding in the locality. We have installed additional measures to prevent flooding of our property the latest was undertaken last year (we are happy to show you the extent of the works).

Pedestrian Safety

The developers yet again take a complacent approach to pedestrian safety.

NPPF paragraph 110 requires safe and suitable access for all users. Yet the development will be accessed by two routes both of which are unsuitable for the safety of pedestrians.

One access is to Borers Arms Road through a busy industrial estate (which the developer intends to enlarge) this will entail the pedestrians having to navigate past goods vehicles delivering and reversing and then on to Borers Arms Road which has very little pavement and pedestrians must criss-cross to each side to avoid walking in the road.

The second entrance is on to Copthorne bank, which again has little pavement, and in some cases none, pedestrians must criss-cross to each side to avoid walking in the road. Copthorne Bank also has a very nasty bend where only recently two pedestrians were badly injured when a vehicle mounted the pavement. Refer to (<https://www.sussexexpress.co.uk/news/crime/two-pedestrians-seriously-injured-in-copthorne-collision-4637671>)

The very narrow, dangerous pathway beside St Francis Care Home wall is a very real danger to pedestrians, attempting access to Copthorne Village and the application makes no attempt to show how this could be addressed.

The developers fail to show how school children and pedestrians can safely reach schools, GP surgery, shops, and other infrastructure.

Due to of the lack of pavement and the unsuitable route for pedestrians it is most likely that parents will decide to drive their children to school and clubs, this will only exacerbate the danger to those that walk or cycle and further discourage walking and cycling.

Traffic and Congestion

With over 700 more people and circa 390 more cars there will be an unacceptable impact on highway traffic and safety for both Copthorne Bank and Bowers Arms road and all adjoining roads and junctions.

It is interesting that the highways authority has requested additional time to undertake an impact assessment.

Infrastructure

The existing schools, GP surgery and sports clubs are already oversubscribed, and the occupants of this proposed development would not have access to a range of services and facilities and public transport, and, in consequence, they would not be sustainably located.

There is no clear plan for additional school places, GP capacity, or infrastructure to support this scale of growth.

It is noteworthy the residents on the development on the west side of Copthorne comprising of 500 plus houses, are already complaining of the lack of school or GP services and are having to travel out of the village for such.

It is interesting to note that some of the objectors are teachers and club leaders, and they all say the same "there is no more capacity and that their waiting list is already full"

Cumulative Impact

Copthorne has already seen large and small developments over the past few years one such development is still under construction and consists of 500 houses on the West side of Copthorne at Heathy Wood.

The National Planning Policy Framework requires decision makers to consider cumulative impacts, not just the effects of one scheme in isolation. Relevant policy: Paragraph 109

Personal Statement

Most people in the UK watch TV programmes showing the destruction of species their habitat and in some cases the extinction of whole species with horror and foreboding of what the future of the earth will be.

They and the UK government plead with countries to protect habitat and species. We rightly put forward reasons why villages in foreign lands should live side by side with nature and in some cases wild animals which often eat their livestock and in some cases the people themselves.

These so-called developing countries are making enormous efforts to save species and preserve habitat and live in harmony with nature. Whilst the so-called developed nation of the UK seems to be moving in the opposite direction and putting profit first and speaking with double standards on conservation.

If this application is granted those who grant it should hang their head in shame. For if the UK cannot protect the last 10% of unimproved meadows and the species who depend on such habitat for survival, we have no right to ask others to do what we fail to do ourselves.

Conclusion

The site is green belt
The site is SNCI status
The site forms part of the last 10% of unimproved meadow in the UK
The site is home to many protect species
The developers admit that the 10% diversity net gain is unachievable
The site has had habitat degradation in the past 3 years prior to the ecological survey
The ecological survey is flawed and cannot be relied upon (incorrect briefing and timing)
The ecological survey failed to properly survey the site for great crested newts
The developer's archaeology survey is inadequate.
The proposals fail to show safe pedestrian routes to infrastructure/schools/GP/village shops
The proposals fail miserably to show how flooding with be avoided to existing houses
Village infrastructure is already full and at breaking point
The village roads are unsuitable for such a large-scale development
The development will go against the guidance preventing the joining up of settlements in this case Copthorne and Smallfield.
The site has not been allocated in the local Plan and is not in accordance with the "Preferred Strategy
The site was assessed by Tandridge's own ecology review as unsuitable for development [SEBA 2016 DOM13].

I believed due to the rejection of the wider Local Plan; this application is no more than a speculative application by developers who have paid little attention to the significant importance of the SNCI status and the fact the area is part of the last remaining 10% of the UK unimproved meadows.

The application therefore should be robustly refused

