

Steven King

From: [REDACTED]
Sent: [REDACTED]
To: [REDACTED]
Cc: [REDACTED]
Subject: Objection to 2025/1376 and consultation 2026/928 – land, ecology and protected species
Attachments: Maidenbower Infant School comments.pdf

Dear Ms Song,

Please register this email as my formal objection and further representation concerning:

- application 2025/1376; and
- consultation reference 2026/928, relating to Mid Sussex application DM/26/0303.

I am an adjoining resident. Please read this email alongside my objection to 2025/1376, dated 28 March 2026. My aforementioned concerns remain.

Relationship between the applications

The use of three references for substantially the same development makes the process difficult to follow. Please confirm that:

- my earlier objection remains registered under 2025/1376;
- this representation will be linked to both Tandridge references;
- relevant representations and consultee responses, including Surrey Wildlife Trust's responses, will be considered;
- this representation will be supplied to Mid Sussex District Council under DM/26/0303; and
- residents will be allowed to comment on any further significant information or amended plans.

Copthorne Meadows SNCI

Surrey Wildlife Trust formally objected to the proposal. Its concerns included:

- destruction of approximately 60% of Copthorne Meadows SNCI;
- loss of around half of its best lowland-meadow grassland;
- insufficient compensation;
- failure properly to apply the mitigation hierarchy;
- loss of lowland mixed deciduous woodland;
- outdated or incomplete protected-species evidence;
- no detailed invertebrate survey; and
- unresolved biodiversity-net-gain calculations.

Lowland meadow, qualifying hedgerows and lowland mixed deciduous woodland are Habitats of Principal Importance.

Tandridge Policy DP19 requires significant harm to be avoided and less harmful alternatives to be considered. Please explain what new evidence, if any, has resolved Surrey Wildlife Trust's objections.

Protected wildlife and habitats — legal protection

The following protections are relevant:

- Badgers and their setts — Protection of Badgers Act 1992. It is an offence, without an appropriate licence, to kill, injure or take a badger; damage or destroy a sett; obstruct access to it; or disturb a badger occupying it.
- Bats and their roosts — Conservation of Habitats and Species Regulations 2017 and Wildlife and Countryside Act 1981. Bats and their breeding sites and resting places are protected. A roost remains protected when bats are not present.
- Hazel dormice and their breeding or resting places — Conservation of Habitats and Species Regulations 2017 and Wildlife and Countryside Act 1981. Capturing, injuring, killing or unlawfully disturbing a dormouse, or damaging or destroying its breeding or resting place, may constitute an offence.
- Great crested newts and their breeding or resting places — Conservation of Habitats and Species Regulations 2017 and Wildlife and Countryside Act 1981. Assessment may need to cover ponds and connected terrestrial habitat used for shelter, foraging and hibernation.
- Grass snakes and common lizards — Wildlife and Countryside Act 1981. They are protected against intentional killing and injury.
- Wild birds, eggs and active nests — Wildlife and Countryside Act 1981. Schedule 1 species receive additional protection from disturbance while nesting.
- Native bluebells — Wildlife and Countryside Act 1981. They are protected against specified commercial activities. Uprooting any wild plant without the landowner's or occupier's authority may also be an offence.
- Common toads — Species of Principal Importance under section 41 of the Natural Environment and Rural Communities Act 2006. They do not receive the same strict protection as bats or dormice, but their conservation must be considered.
- Important hedgerows — Hedgerows Regulations 1997. Removal of a qualifying important hedgerow may require formal notice and may be prohibited.
- Lowland meadow, qualifying hedgerows and lowland mixed deciduous woodland — Habitats of Principal Importance under section 41 of the Natural Environment and Rural Communities Act 2006. The Council's section 40 biodiversity duty is relevant.
- Copthorne Meadows SNCI — protected through the development plan, including Tandridge Policy DP19. Its non-statutory status does not remove the requirement to avoid, mitigate and, only as a last resort, compensate for significant harm.

Surrey Wildlife Trust identified concerns about the available surveys. These included apparently expired badger information, trees not assessed for bats since 2019, old building survey information, a dormouse record, great-crested-newt work dating from 2023, recorded reptiles and common toads, and insufficient information about wintering birds and invertebrates.

Please provide a concise species-by-species schedule confirming:

- which surveys were undertaken and when;
- the areas covered, including Thorne Copse and both accesses;
- whether the surveys remain current;
- the effects identified;
- the avoidance and mitigation measures proposed;

- whether a Natural England licence would be required;
- whether the applicable licensing tests are capable of being met; and
- how the measures will be secured, monitored and enforced.

I am not asking for sensitive sett or roost locations to be published. However, current information must be available to the authorities and their ecological advisers. Surveys should not be left until after permission where the results could change the layout, access, drainage, lighting or developable area.

Thorne Copse and drainage

Thorne Copse appears in the later material although, as I understood it, it was not within the original application boundary.

Please explain whether it is intended to provide public open space, drainage, ecological mitigation, biodiversity net gain or another function.

The applicant's Flood Risk Assessment reportedly states that:

- the site has soils with impeded drainage;
- groundwater was encountered at approximately 1.85 metres and 2.5 metres below ground level;
- all four soakaway tests failed; and
- soakaway drainage is not viable.

Thorne Copse is also known locally to become wet and waterlogged. Please establish whether it would be safely accessible throughout the year, whether seasonal groundwater monitoring has been completed and whether drainage or access works would damage its habitat or increase flood risk elsewhere.

The copse is regularly used by deer. Although this does not prevent development, it is relevant to wildlife movement, habitat connectivity, fencing, lighting and road-collision risk.

Biodiversity net gain and possible degradation

The biodiversity metric reviewed by Surrey Wildlife Trust reportedly showed:

- a 63.68% on-site loss in habitat units;
- a 9.09% on-site hedgerow gain; and
- a remaining 22.69% habitat-unit loss even with the identified off-site scheme.

Please confirm whether a corrected metric has been submitted, whether it has been independently checked and whether Thorne Copse is being treated as on-site or off-site provision.

Surrey Wildlife Trust also reported allegations and photographs concerning possible habitat degradation. It did not conclude that unlawful degradation had occurred, and I do not ask the Council to assume that it did.

However, please investigate objectively what cutting, flailing, grazing or scrub clearance has occurred since 30 January 2020 and whether an earlier habitat condition must be used for the statutory biodiversity baseline.

Schools and cross-boundary education

The development would expand Copthorne and use a Copthorne address. The relevant assessment of local mainstream capacity must therefore consider schools administered by West Sussex County Council, rather than relying on spare capacity elsewhere in Tandridge.

The Headteacher of Maidenbower Infant School has stated that Copthorne schools are already oversubscribed and that Maidenbower regularly admits between four and six children each year who could not obtain a place at a Copthorne school.

Aurora Redehall School in Smallfield must not be counted as available mainstream capacity. It is a specialist school. Placement requires an Education, Health and Care Plan, formal local-authority consultation, an individual assessment that the school can meet the child's needs and agreed funding.

Please obtain confirmation from West Sussex County Council about:

- existing and forecast capacity at Copthorne's mainstream schools;
- current overflow and in-year admission pressures;
- the effect of this and other committed developments;
- where the children generated by the development would realistically attend school;
- whether additional places or school expansion would be required; and
- how and when those places would be delivered.

Any specialist or EHCP-only schools must be clearly identified and excluded from calculations of general mainstream capacity.

Highways, parking and pedestrian safety

Please also ask the relevant highway authority to address:

- the reportedly widened access exceeding ten metres;
- the reported reduction of the footway to approximately 1.5 metres near Units 4 and 12;
- the Road Safety Audit recommendations concerning a pedestrian refuge or shorter crossing and a two-metre footway;
- safety for children, wheelchair users, people using mobility aids and parents with pushchairs;
- the reported loss of eight existing employment parking spaces;
- whether the 64 commercial spaces are required for the proposed commercial building rather than replacing existing spaces;
- the reported RFC above 1.0 at the A2220/Copthorne Common Road roundabout;
- additional school journeys caused by children being unable to attend Copthorne schools; and
- whether the collision study period was sufficiently long.

Conclusion

I am asking Tandridge to satisfy itself that the evidence is complete, current and independently reviewed.

If the ecological, drainage, education and highway concerns remain unresolved, I ask Tandridge to refuse application 2025/1376 and withhold support in its consultation response under 2026/928.

Please acknowledge receipt and confirm that:

- this representation has been registered against both Tandridge references;
- it will be supplied to Mid Sussex District Council under DM/26/0303;
- my objection dated 28 March 2026 remains linked to the proposal; and
- my personal information will be redacted before publication.

Yours sincerely,

