

TA/2026/559 Land to the South of Ship Hill, Tatsfield, Surrey, TN16 2AH

Demolition of existing buildings and erection of 84 dwellings with associated works (Outline application with all matters reserved except access, layout, and scale).

Comment:

Executive Summary

Tatsfield Parish Council formally objects in the strongest possible terms to outline planning application 2026/559. While the applicant seeks to frame this speculative layout as an appropriate development under the national 'Grey Belt' delivery provisions, the Parish Council provides clear, evidence-based planning reasons demonstrating that the proposal fundamentally conflicts with the NPPF, Tandridge Local Plan and Tatsfield Neighbourhood Plan.

The developer's submission represents a major estate-scale urban expansion onto sensitive, open greenfield land completely outside the Defined Village settlement boundary of Tatsfield village. The applicant's technical documentation contains severe deficiencies and unresolved conflicts regarding Green Belt policy, landscape character preservation, statutory biodiversity trading rules, highways and infrastructure capacity, historic environment assets, and physical public safety constraints. The application must therefore be refused.

Detailed Grounds of Objection

1. Fundamental Violation of Green Belt Policy and Invalidation of the Grey Belt Claim

The applicant's Planning Statement admits that the entire 4.22 hectare site is located within the Metropolitan Green Belt. To circumvent the strict statutory presumption against inappropriate development, the applicant relies on the newly introduced national Grey Belt provisions to assert that the development is 'not inappropriate'.

Tatsfield Parish Council requests that Tandridge District Council reject this claim on the following grounds:

1.1 Green Belt Purpose C Preservation: Under paragraph 143 of the National Planning Policy Framework (NPPF), a core purpose of the Green Belt is *‘to assist in safeguarding the countryside from encroachment’*. The applicant's own ecological and arboricultural assessments describe the vast majority of the land as open grazing fields, agricultural paddocks, rural hedgerows, and a native edge-of-village landscape.

The presence of a timber stable yard and a rubber-shred exercise menage does not alter the character of the remaining open land. Siting an 84-dwelling estate here represents an inappropriate encroachment into the countryside.

1.2 Granularity of Grey Belt Assessments: National Planning Practice Guidance (PPG) on the Green Belt explicitly mandates that assessments to identify Grey Belt land must be sufficiently granular to examine the variable contribution of smaller subdivisions, rather than applying a general classification across a large assessment block.

The applicant has failed to provide a granular study. While the localised footprint of the timber stables might arguably represent previously developed land, the remaining 3.5 hectares of fields strongly perform the core Green Belt role of safeguarding open land and must be excluded from any Grey Belt re-classification.

1.3 Failure to Satisfy Statutory Grey Belt Criteria and Breach of National ‘Golden Rules’

The applicant's strategy relies on a flawed interpretation of the ‘Grey Belt’ designation introduced in the revised National Planning Policy Framework (NPPF).

To qualify as a *‘not inappropriate’* development on Grey Belt land under NPPF Paragraph 155, a scheme must demonstrate that the site *‘does not strongly contribute’* to specific Green Belt purposes, stands in a sustainable location, and fully satisfies the three mandatory strands of the national Golden Rules.

The developer's submission fails on all counts:

1.3.1. Fundamental Failure of Green Belt Purpose Compliance (NPPF Paragraph 143)

The NPPF definition of Green Belt explicitly confines the designation to '*previously developed land*' (PDL) or land that '*does not strongly contribute*' to any of the following three statutory purposes set out in Paragraph 143:

- **(a) To check the unrestricted sprawl of large built-up areas:** Siting a major residential estate on this agricultural field would set a precedent for large-scale piecemeal urbanisation along the southern edge of the Tatsfield settlement boundary (defined village) and, more broadly, the London fringe.
- **(b) To prevent neighbouring towns merging into one another** (and, by reasonable planning interpretation, villages): This is one of the site's primary structural planning functions. The application parcel forms part of an important green buffer zone around the defined village boundary of Tatsfield, remote rural landmarks such as St Mary's Church and small clusters of rural homes along Church Hill. The Surrey Hills National Landscape is just to the south and the continuous built-up boundary of the London Borough of Bromley

(Biggin Hill) directly to the north. Urbanising this site directly undermines Purpose (b), significantly expanding the settlement pattern and creating merger with other distinct remote clusters of rural buildings.

- **(d) To preserve the setting and special character of historic towns:** The site directly limits built expansion to protect the setting of Tatsfield village, preserving the historic rural views and transition from the open North Downs noted in Chapter 01.1 of the Tatsfield Neighbourhood Plan.

Because the site contributes significantly to all three of these core planning fields, it cannot be reclassified as Green Belt. The proposal remains an inappropriate development in the Green Belt, requiring 'very special circumstances' that have clearly not been demonstrated.

1.3.2. Breach of Golden Rule Strand A (Affordable Housing and Viability Loops)

NPPF Paragraph 156 and 157 mandate that until local plan policies are updated, any major development in the Green Belt must provide an affordable housing contribution **15 percentage points above the highest existing local policy requirement, capped at 50%**. While the applicant offers a 49% affordable housing split to align with this rule, this benefit is un-secured and technically flawed.

National Planning Practice Guidance (PPG) on Green Belt viability establishes that site-specific viability assessments cannot be used to reduce this affordable housing requirement. Because the developer's infrastructure layout contains unmitigated on-site costs, including a net loss of 12.69% in area habitat units that requires expensive, un-priced off-site compensation, the viability of delivering this 49% allocation remains completely unproven. The Council cannot give weight to affordable housing claims until they are fully bound through a completed Section 106 legal agreement.

1.3.3. Breach of Golden Rule Strand B (Infrastructure Capacity Failure)

The second strand of the national Golden Rules requires developments to deliver **all necessary improvements to local or national infrastructure** directly impacted by the development. The applicant has failed to meet this requirement.

As established by the **Surrey Fire and Rescue Authority's formal holding objection**, the outline application lacks the mandatory technical data required to prove compliance with UK Building Regulations Approved Document B5 safety standards.

The layout fails to show that local approach corridors can support a 26-tonne appliance footprint load, or that the internal streets provide the clear 6.0m operational width required for high-reach emergency machinery.

Because emergency rescue access is an essential requirement under Objective 6 of the Tatsfield Neighbourhood Plan, the application breaches Strand B of the national framework.

1.3.4. Breach of Golden Rule Strand C (Accessible Green Space Deficiency)

The final strand of the Golden Rules dictates that housing schemes on Green Belt or Grey Belt land must provide **new or improved green spaces that are accessible to the public, ensuring that new residents can access good quality green infrastructure within a short walk.**

The applicant's layout fails to deliver a high-quality green infrastructure asset that aligns with this policy. The on-site open spaces are dominated by the deep retention ponds required for the Sustainable Drainage System (SuDS). These engineered catchments are heavily constrained by local clay runoff and are prone to waterlogging. They do not constitute usable, dry recreational open space. Siting this infrastructure across the open plateau directly causes a **12.69% net loss in local biodiversity habitat value**. It cannot be counted as a public open space asset, representing a clear breach of Strand C of the national rules and Tatsfield Neighbourhood Plan Policy TNP02G.

2. Conflict with the Statutory Development Plan and Housing Settlement Strategy

The proposal completely contradicts the housing framework established by the local community under a successful and recent Neighbourhood Planning process - now adopted within the statutory Development Plan:

- **Direct Contravention of Policy TNP03A:** The Adopted Tatsfield Neighbourhood Plan (made June 2024) explicitly restricts new residential developments to locations *within* the Defined Village Boundary. The application site is situated in the open countryside, designated under Character Area 3 (Outer Village) and Character Area 4 (Farmland Setting). It does not qualify under any of the acceptable exception categories set out in Policy TNP03A (such as modest infilling within a substantially developed frontage or the redevelopment of brownfield land within the village boundary).
- **Democratic Rejection of Greenfield Allocations:** Page 51 and 52 of the Tatsfield Neighbourhood Plan document that during the formal site assessment process, the adjacent parcel of land (referenced historically as shortlisted site TNP-01), was thoroughly evaluated by Aecom and the Parish Council.

The community explicitly rejected extending the village boundary (Option 1) or allocating edge-of-village greenfield locations for housing (Option 4). Instead, the community formally resolved to adopt Option 5 (Do not allocate housing in the Neighbourhood Plan) to preserve the countryside. Allowing a developer to bypass this statutory protection via an outline application undermines the entire local planning framework.

3. Material Breach of Statutory On-Site Biodiversity Net Gain Requirements

The applicant's ecological submission contains a major National Planning Policy and Neighbourhood Plan compliance failure regarding environmental Biodiversity Net Gain:

- **Failure to Satisfy On-Site Baseline Demands:** The applicant's submitted Statutory Biodiversity Metric tool explicitly confirms that the layout results in a net loss of 12.69% (-2.52 area habitat units) on site. The metric notes that the project's trading rules are not satisfied. This directly violates Policy TNP02G (New Landscaping) of the Tatsfield Neighbourhood Plan, which mandates that all developments must deliver a minimum 10% gain on-site by avoiding or reducing negative impacts on biodiversity during layout design.
- **Speculative Off-Site Deferral Scheme:** The developer proposes to address this deficit by purchasing 4.51 area habitat units from a private habitat bank at Beeches Farm after planning permission is granted. This is a speculative and unsecured arrangement. Because the applicant relies entirely on public benefits to justify Green Belt development, the Council cannot give weight to these claimed improvements while the statutory trading rules remain broken, and the off-site credits are legally unsecured.

4. Unmitigated Harm to Protected Landscape Features and Notable Viewpoint 8

The physical layout of the development creates an unacceptable visual impact on the landscape assets protected by the adopted Tatsfield Neighbourhood Plan:

- **Destruction of Notable Viewpoint 8 Corridor:** Policy TNP02D (Protection of open views) identifies eight specific visual corridors that must be safeguarded from obstruction. The application site directly sits inside Notable Viewpoint 8: *View across from Ship Hill, over the fields towards the old school building*. The applicant's Design and Access Statement claims the view is preserved because the old school building will remain partially visible through a narrow gap. This is incorrect. Section 02.10 of the Neighbourhood Plan states that the value of this view is the open, rural field setting that establishes the transition into the countryside. Siting a dense housing estate here replaces this protected view with an urban streetscape.
- **Admitted Landscape Character Degradation:** The applicant's own Landscape and Visual Appraisal (LVA) admits that users of the Tandridge Border Path (Viewpoints 4 and 5) will experience a **Moderate Adverse visual effect** at Year 1 due to the encroachment of the housing estate into their open views. This direct violation of local landscape protection policies contradicts Objective 10 of the Tatsfield Neighbourhood Plan.

5.0 Highway Safety, Capacity, and the Constraints of Local Country Lanes

5.1 Introduction and Baseline Geometric Realities

The applicant's Transport Statement seeks to characterise Ship Hill and Church Hill as minor distributor corridors fully capable of absorbing an influx of heavy residential and construction traffic. This characterisation completely ignores the local geometric constraints of the surrounding highway network. In reality, both Ship Hill and Church Hill are narrow, historic rural country lanes that lack standard modern carriageway widths, geometric consistency, and uniform pedestrian footways.

Section 02.2 and Section 04.4 of the Adopted Tatsfield Neighbourhood Plan explicitly identify the parish road network as being typically rural, comprised of narrow, meandering lanes lined by long-established hedgerows and mature woodland. These lanes are characterised by an absolute absence of formal urbanisation, generating a distinct country feel that extends right into the settlement edge.

5.2 Specific Geometric Constraints of Church Hill

Church Hill, which forms the southern and eastern boundary of the application site, exhibits severe physical constraints. It functions as a narrow, essentially single-carriageway rural track flanked by steep embankments and mature structural hedgerows. Along considerable stretches of Church Hill, the operational width of the asphalt falls well below the minimum threshold required for two standard passenger vehicles to pass each other safely and fluidly.

As a result, when two vehicles encounter each other travelling in opposite directions, one driver is frequently forced to execute hazardous reversing manoeuvres over long distances or mount vulnerable, un-kerbed grass verges. This creates an immediate risk of vehicle conflict, damages roadside root protection zones, and creates severe safety hazards for non-motorised highway users, including pedestrians, cyclists, and horse riders who frequently use this route to access the wider Public Rights of Way (PROW) network.

5.3 Visibility and Sightline Limitations on Ship Hill

Similarly, the northern frontage along Ship Hill is heavily constrained by topography and dense, mature vegetation. The road features a prominent horizontal curvature and a steep gradient that drops from a high plateau of 231m AOD down to a low northwestern corner of 209m AOD. This steep slope, combined with the dense boundary hedgerows, severely restricts the actual, available sightlines at the proposed estate entry bell mouth.

Because traffic speeds measured by Automatic Traffic Counters (ATC) regularly exceed 31 mph past the site frontage, any vehicle emerging from the proposed estate road will be forced to nose out into oncoming traffic without a clear view of approaching vehicles, creating an unacceptable risk of side-impact collisions.

5.4 Direct Conflict with Development Plan Policies and the NPPF

By introducing a projected 366 daily vehicle movements into a network defined by such severe geometric deficits, the proposal stands in direct and irreconcilable conflict with the following statutory provisions:

- **Policy TNP02B (Protection of rural parish lanes):** This policy explicitly mandates that development proposals *must* maintain and, where practicable, enhance the natural, rural, informal, country lane characteristics of key village approach roads, specifically including Church Hill. The applicant's scheme will inevitably trigger severe suburbanisation through required road widening, structural vegetation clearing to achieve visibility, and the installation of intrusive highway markings, completely destroying the country lane character protected under Policy TNP02B.
- **Aspirational Policy TNP09F (Roads, traffic and safety):** This statutory mechanism establishes that development must not give rise to increases in traffic that damage the rural character or spoil the pattern of parish lanes, and explicitly protects unmade, hedge-bounded tracks from being widened or straightened.
- **Paragraph 115 of the National Planning Policy Framework (NPPF):** The framework commands that development should be refused if there are unresolved issues that would result in an unacceptable impact on highway safety, or if the residual cumulative impacts on the road network would be severe.

Because the applicant's layout forces a heavy, continuous volume of multi-axle construction vehicles, residential cars, and heavy delivery vans into a restricted, sub-standard rural lane network, the cumulative impact on local highway functionality will be severe.

5.5 Overstated Transport Sustainability and Deficient Traffic Baseline Data

The applicant's Transport Statement overstates the sustainability of the location, a claim that must be technically challenged:

- **Conflict with the Defined Rural Settlement Profile:** The applicant's highway modelling relies on very outdated 2011 Census journey-to-work metrics. The Tandridge District Settlement Hierarchy formally designates Tatsfield as a Rural Settlement with a basic, minimal tier of services and shops, explicitly recognising that residents are heavily reliant on external private vehicle travel for work, shopping, healthcare, and secondary education.
- **Unviable Sustainable Infrastructure Assumptions:** The nearest railway stations are not within reasonable walking distance. Accessing them by car still generates private vehicle trips. Furthermore, the local 695 bus routing

cited by the developer is a very restricted school service taking local children to Oxted School, not a viable daily public transit option for commuting professionals.

- **Violation of Parish Lane Trip Volume Caps:** The addition of 84 dwellings will introduce an estimated 366 daily vehicle movements - a 16% increase over base traffic flows on Ship Hill. This trip generation directly violates **Aspirational Policy TNP09F (Roads, traffic and safety)**, which explicitly states that developments must not give rise to traffic increases that damage the narrow, rural character of the parish lanes.

6. Holding Objection from Surrey Fire and Rescue Authority

The applicant is asking to permanently fix the site access, layout, and scale parameters at this outline stage. This request is unadopted and unsafe due to a critical statutory holding objection:

- **Insufficient Technical Scale Data:** In their formal consultation response (dated 24th June 2026), the Surrey Fire and Rescue Authority (SFRS) states that the outline files contain insufficient technical data to verify compliance with Approved Document B5 safety guidelines in the UK Building Regulations.
- **Unresolved Access Dimensions:** Because Ship Hill is steep and constrained, featuring a sharp bend close to the proposed entrance, the Council cannot approve the scale and layout parameters while the fire authority is unable to confirm safe entry, deployment, and turning paths for a standard 26-tonne appliance footprint load. Proceeding to lock in layout parameters before resolving these safety requirements violates the infrastructure delivery principles of Objective 6 of the Tatsfield Neighbourhood Plan.

7. Deficient Pre-Determination Evaluation of Historic Environment Assets

The site holds significant sub-surface historical value that has not been evaluated prior to determination:

- **High Risk of Heritage Destruction:** The statutory response from the SCC Senior Archaeologist (Nigel Randall, dated 25th June 2026) confirms that the northeastern sector of the application site contains a high potential for sub-surface remains associated with the historic 18th-century Tatsfield Parsonage House, which stood on the land until its demolition by 1861.
- **Incompatibility with Outline Parameter Approval:** Because sub-surface archaeological assets directly govern the physical placement of foundations, road routing, and the footprints of the open-air SuDS infiltration basins, these remains must be identified before layout and scale parameters are legally locked in.

Deferring this work to a post-consent condition via a Written Scheme of Investigation (WSI) is completely inappropriate. In line with Tatsfield Neighbourhood Plan Policy TNP06B(e), a comprehensive grid of physical archaeological trial trenching must be executed pre-determination to avoid the irreversible destruction of locally significant heritage assets.

8. Technical Contradictions Regarding Major Pipeline Hazards

The applicant's Utilities and Wastewater Note contains a direct technical contradiction regarding a critical public safety constraint:

- **Presence of a Major Accident Hazard Pipeline:** The applicant's report confirms that National Gas Transmission's high-pressure main routes directly south of the site, and that the HSE Outer Consultation Zone covers a large portion of the proposed housing layout. The high-pressure main running along the North Downs near Tatsfield is part of the UK's National Transmission System (NTS). This critical backbone of the country's energy network transports large volumes of gas at high speeds to power stations, major industries, and local Gas Distribution Networks.
- **Contradictory Safety Screening:** Paradoxically, the same report asserts in later paragraphs that there are 'no major pipelines or transmission infrastructure nearby that would act as a constraint'. This technical inconsistency presents an unquantified safety risk. The Local Planning Authority must refuse to determine this application until the formal Health and Safety Executive (HSE/PADHI) risk assessment has been fully published and reconciled against the proposed layout density.

9. Failure to Demonstrate Dark Night Skies Compliance Metrics

Because the land sits outside the Defined Village boundary on a dark rural edge, it is exceptionally vulnerable to light pollution in an area that is currently without street lighting or major building groups:

- **Violation of Tatsfield Neighbourhood Plan Policy TNP02J: Policy TNP02J (Tranquillity and dark night skies)** establishes a strict requirement that all external lighting schemes for developments outside the Defined Village must explicitly prove they do not exceed the restrictive illuminance caps set for Environmental Zone E1 (Natural Darkness).
- **Unmitigated Risk to Ecological Corridors:** While the applicant's ecological assessment calls for a dark corridor to protect confirmed day roosts for common pipistrelle and brown long-eared bats inside the stable block, the energy statement concurrently calls for extensive street lighting and roof-light windows across all 84 properties. The submission fails to supply a technical lighting model demonstrating compliance with Zone E1 thresholds, creating an unmitigated threat to protected bat foraging corridors and violating Tatsfield Neighbourhood Plan Policy TNP02J.

10. Ecological Impact and Biodiversity Loss

10.1. Conflict with National and Local Planning Policy

The application directly contradicts local and national policies designed to protect the natural environment:

- NPPF Chapter 15 (Conserving and Enhancing the Natural Environment): Paragraphs 180 and 186 state that planning decisions should contribute to and enhance the natural environment by protecting and enhancing valued landscapes, sites of biodiversity value, and minimising impacts on biodiversity.
- Tatsfield Neighbourhood Plan (TNP) - Built and Natural Environment Framework: The Plan explicitly requires development to protect local

biodiversity, wildlife corridors, and prevent 'habitat fragmentation and broken links' to ensure the rural aspect of the Parish is maintained.

10.2. Failure to Account for Protected and Notable Avian Species

Contrary to the applicant's limited desk-based assessment, extensive, multi-season field observations confirm the site is functionally critical for protected and high-conservation-status birds. The development would cause irreversible habitat loss for:

- Schedule 1 Species: Red Kites (Wildlife and Countryside Act 1981), alongside Buzzards and Kestrels, which rely heavily on these open fields as primary foraging grounds.
- UK Red List Species: Swifts, Swallows, Song Thrushes, and Mistle Thrushes. The presence of these aerial insectivores and passerines proves the site possesses a highly productive invertebrate biomass and vital seasonal foraging resources (established wild raspberry/blackberry scrub) that cannot be replicated.
- Local Apex Species: Tawny Owls and a breeding pair of Ravens, indicating a mature, deeply connected ecosystem.

10.3. Destruction of Terrestrial Mammal Corridors and Fragmentation

The site acts as a critical ecological artery linking local woodlands, hedgerows, and adjacent countryside.

- Protected Mammals: Badgers (protected under the Protection of Badgers Act 1992) regularly utilise these fields to commute between the site and adjacent ancient woodland.
- Severance of Corridors: In direct conflict with Neighbourhood Plan objectives to 'prevent habitat fragmentation', the insertion of an urban footprint, complete with artificial light pollution, domestic noise, and human activity, will permanently sever this functional wildlife corridor, isolating local populations.

10.4. Flawed Biodiversity Baseline and Inadequate Mitigation

- Pollinator Habitat Loss: The existing grassland supports an abundance of bees and butterflies. Stripping this land conflicts with the NPPF mandate to provide net gains for biodiversity.

- **Inadequacy of Mitigation:** In line with NPPF Paragraph 186(a) (the mitigation hierarchy), biodiversity loss must first be avoided. The Parish Council rejects any assertion that post-development landscaping can replace the complex, symbiotic relationships of an ecosystem matured over decades. The applicant's Biodiversity Net Gain (BNG) baseline calculations are fundamentally flawed as they significantly underestimate the site's true ecological value.

The ecological value of this land has been severely undervalued. In accordance with the Tatsfield Neighbourhood Plan and NPPF Chapter 15, this application cannot progress until comprehensive, independent, multi-season ecological surveys are completed and submitted for review.

Conclusion:

Tatsfield Parish Council submits that planning application ref. 2026/559 represents an unjustified, estate-scale development that fundamentally conflicts with local and national planning policies. This proposal is not a modest village infill scheme. It is an inappropriate 84 dwelling encroachment into the protected Metropolitan Green Belt that violates the settlement strategy, housing constraints, visual protections, design standards, and dark night skies policies of the Adopted Tatsfield Neighbourhood Plan (2024).

The site is not Grey Belt under NPPF Paragraph 143 and fails to satisfy the mandatory national Golden Rules required to unlock such land.

Critical infrastructure and environmental constraints remain unresolved, downplayed, or deferred to post-determination conditions. An outline application cannot legally lock in layout, scale, and access parameters while these fundamental physical, infrastructure, and safety constraints remain unaddressed:

- Highway Safety
- Notable Views
- Heritage Assets

- Pipeline Hazard
- Dark Night Skies
- Biodiversity and Ecology

To safeguard the semi-rural identity of the parish, Tatsfield Parish Council formally requests that Tandridge District Council uphold the Development Plan and refuse planning permission for application 2026/559.