

Planning application 2026/650

Hybrid application for phased residential development comprising: in Full - access arrangements including new pedestrian footpath into New Farthingdale and conversion of Farindons into 4 town houses. In outline: erection of up to 65 dwellings with all matters reserved

Farindons, High Street, Dormansland, Lingfield, Surrey, RH7 6NN

REPRESENTATION PREPARED BY ONH PLANNING FOR GOOD ON BEHALF OF
DORMANSLAND PARISH COUNCIL

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Summary of Representation

- The Parish Council **objects** to the proposed development.
- The transport evidence does not demonstrate that the site is a sustainable location for the purposes of §110, §115 and §155(c) of the NPPF. The Transport Assessment forecasts only vehicular trips, undertakes no assessment of active travel demand against Active Travel England's standing advice, fails LTN 1/20 on the applicant's own traffic data, and depends upon a 20mph Traffic Regulation Order that cannot be assumed at this stage.
- The application does not satisfy the golden rules at §156(b) of the NPPF. The applicant's own evidence concedes a secondary school capacity deficit, Dormansland Primary School has no meaningful headroom, and Lingfield Surgery, is already the subject of ICB requirements for additional primary care provision. Sole reliance on unquantified and unplanned spend CIL receipts is incapable of securing the necessary improvements, and the cumulative demand of other recent permissions in the locality has not been assessed.
- The unresolved objection of the Lead Local Flood Authority engages the flood risk policies within Footnote 7 of the NPPF. While that objection stands, the decision-maker cannot conclude that the Grey Belt provisions of §155 or the provisions of §11(d) are satisfied.
- The determination is scheduled days before the close of the Regulation 16 consultation on the Dormansland Neighbourhood Plan. Determination should be deferred until that consultation has closed, so that appropriate weight can be attached to the emerging plan in accordance with §48 of the NPPF.
- In the event that the Local Planning Authority is nonetheless minded to approve the application, the conditions and planning obligations set out in section 3 of this representation are requested.

1. Relevant Policies

- 1.1 The Parish Council relies upon the policies identified in table 2 in the Planning Statement supporting the application together with the material considerations in the National Planning Policy Framework (NPPF), Active Travel England's Standing Advice and Local Transport Note 1/20.
- 1.2 The Planning Statement also recognises the Dormansland Neighbourhood Plan (DNP) in §5.9. The Regulation 16 consultation is scheduled to start 24 July 2026 for a minimum of six weeks therefore likely ending on 4 September 2026. It is noted that the planning application decision date is currently scheduled for 28 August 2026.
- 1.3 A decision on the application is therefore due days before the end of the Regulation 16 consultation period on the DNP. The Parish Council has worked closely with the Local Planning Authority and other stakeholders throughout the DNP process to ensure that its content meets the basic conditions. It is therefore considered that the decision-maker should exercise the provisions of §48 of the National Planning Policy Framework (NPPF) to ensure that relevant policies in the emerging DNP including its Design Code, which will be at an advanced stage, is anticipated to have few, if any, unresolved objections, and has full regard to the NPPF, are assigned material and increasing weight.
- 1.4 The Regulation 15 Submission version of the DNP (December 2025) contains policies of relevance to the determination of this application including:
 - DNP1: A Spatial Plan for the Parish
 - DNP2: Supporting Good Design
 - DNP4: Promoting the Natural Environment

2. Key Issues

Sustainable Location

- 2.1 The Parish Council's principal concern is that the application has not demonstrated, through robust evidence, that the development would genuinely prioritise sustainable modes of travel. Active Travel England's Standing Advice Note: Active Travel and Sustainable Development (June 2024) sets out the matters that transport submissions for residential development should address. While the scheme falls below the threshold for statutory consultation with Active Travel England (ATE), the advice note confirms that local planning authorities should use the guidance routinely in the assessment of planning applications and afford it due weight. Whilst §110 of the NPPF recognises that opportunities to maximise sustainable transport will vary between urban and rural areas, this does not remove the need to assess active travel. The submitted Transport Assessment and Framework Travel Plan fall short of that guidance in several material respects. Consequently, notwithstanding the site's rural location, the assessment does not demonstrate the likely demand for active travel or how the proposed infrastructure responds to that demand.

- 2.2 The ATE advice note expects Transport Assessments to forecast the volume and distribution of all-day pedestrian and cycling trips to, from and within the site, aligned with the national target that half of all journeys in towns and villages should be walked, wheeled or cycled by 2030. The Transport Assessment contains no forecast of walking, wheeling or cycling trips and makes no reference to the national target. The trip generation exercise is confined to vehicular movements.
- 2.3 The Transport Assessment proposes no cycle infrastructure and relies wholly on the village-wide 20mph limit to make on-carriageway cycling acceptable. Under LTN 1/20, which the ATE advice note applies to off-site cycling provision, mixed-traffic cycling at 20mph is generally suitable only where traffic volumes are in the order of 2,500 vehicles per day or fewer. The applicant's own 2026 ATC surveys (Table 5E) record approximately 4,500 to 4,700 vehicles per day on High Street. On the applicant's evidence, High Street would carry nearly double the volume at which LTN 1/20 considers mixed-traffic cycling appropriate, even if the 20mph limit is delivered in full. No assessment against LTN 1/20, the Cycling Level of Service Tool or the Junction Assessment Tool has been undertaken, and no route audit of any kind is presented; reliance is instead placed on Strava heatmaps, which record existing use but say nothing about route safety and condition or compliance with current design standards.
- 2.4 The 20mph limit is central to the applicant's case on cycling conditions and highway safety, yet it requires a Traffic Regulation Order (TRO) subject to its own statutory consultation process. The Transport Assessment does not address the position should the Order not be made or be made in modified form. The Parish Council urges the decision-maker to be satisfied that the development is acceptable on the basis of existing recorded speeds and conditions or seeks measures that secure the outcome sought in the separate statutory TRO process.
- 2.5 The Framework Travel Plan is noted, but the Transport Assessment fails to undertake the active travel forecasting that ATE expects. The Framework Travel Plan cannot cure that omission because it is designed to influence and monitor travel behaviour after occupation, whereas the forecasting exercise should inform the assessment of the development before permission is granted.
- 2.6 The indicative targets presented in the Framework Travel Plan do not engage with the national active travel target. The Year 5 position in Table 5A is 24 per cent walking and 3 per cent cycling, a combined active mode share of 27 per cent, with car-based modes remaining at 67 per cent. The advice note requires targets to be ambitious and aligned with the national target; the Framework Travel Plan neither meets that benchmark nor explains any departure from it. The monitoring period also runs for five years from the baseline travel survey, whereas the ATE advice note requires targets to extend to five years beyond final occupation of the development.
- 2.7 Finally, the document does not appear to be site-specific. Paragraph 6.1.1 describes the site as occupying a "highly accessible, station-adjacent location" when Dormans station is 1.2 kilometres away and the site frontage has no footway. The TRICS appendix likewise records surveys deselected as low trip generating sites while the parameter summary states that no surveys were manually removed, an inconsistency

between the stated methodology and the audit trail that is considered should be clarified.

- 2.8 The Parish Council therefore considers that the submission at this time does not demonstrate compliance with ATE's standing advice. Active travel demand has not been forecast, cycling conditions fail the applicant's own traffic data when tested against LTN 1/20, the mitigation strategy depends on a TRO that cannot be assumed at this stage, and the travel plan includes targets that fall well short of national policy. These matters go to the heart of whether the development would genuinely prioritise sustainable transport, and the Parish Council urges the decision-maker to require them to be resolved before the application is determined.
- 2.9 None of the appeal decisions cited by the applicant demonstrates that ATE's advice note was considered, still less that it was given little weight. The appeals simply confirm that sustainability in rural areas requires a site-specific planning judgment under NPPF §110 and §115. They do not establish that an applicant can dispense with the evidence-led assessment of active travel expected by ATE when preparing a Transport Assessment.
- 2.10 Whilst ATE's Standing Advice and Planning Application Assessment Toolkit do not form part of the development plan and are not policy in themselves, they constitute the Government's specialist technical guidance on assessing active travel impacts in planning applications. Accordingly, they are capable of attracting material weight in evaluating the robustness of a Transport Assessment. Recent appeal decisions demonstrate that Inspectors do not apply the guidance mechanistically or treat recommended distance thresholds as absolute. Rather, they undertake a site-specific assessment of whether the evidence demonstrates that walking, wheeling and cycling would provide realistic, attractive and convenient alternatives to private car use. Where that evidence is lacking, or where proposed routes are unlikely to encourage meaningful modal shift, Inspectors have attached significant weight to those shortcomings in the planning balance. Conversely, where the overall accessibility evidence demonstrates genuine opportunities for sustainable travel, rigid reliance on guideline distances has been rejected.
- 2.11 In the present case, the issue is not whether Farindons must achieve an urban level of active travel, nor whether every destination lies within the indicative 800-metre walking distance. Rather, the issue is whether the Transport Assessment provides the evidence necessary to undertake the site-specific assessment envisaged by both the NPPF and ATE. The Parish Council considers that it does not. The Assessment forecasts only vehicular trips, provides no forecast of the likely volume or distribution of walking, wheeling or cycling trips, does not quantify the likely effect of the proposed active travel measures, and does not explain how those forecasts have been aligned with national or local active travel objectives. Consequently, there is insufficient evidence to conclude that the proposed infrastructure would provide realistic opportunities for meaningful modal shift or reduce reliance on the private car. This evidential deficiency should therefore attract material weight in the assessment of the proposal's sustainability.

Infrastructure capacity

- 2.12 It is noted that the applicant's Health Impact Assessment concedes that secondary school capacity is insufficient and this is proposed to be dealt with by CIL contributions. The Parish Council does not consider that reliance on CIL alone is an appropriate response to the conceded secondary school capacity deficit. There is no delivery pathway through which the levy could resolve it. Tandridge does not allocate CIL to a programmed schedule of infrastructure but through an annual competitive bidding process, across all infrastructure categories district-wide, within which the education authority would need to bid against parish, community and leisure projects with no guarantee of success. Even were such a bid made and successful, the sums are of a different order to the need. A CIL payment made on commencement, into a discretionary district fund, with no identified project, no funding commitment and no delivery body, cannot secure school places required upon occupation. The applicant's assertion that CIL contributions "would help to mitigate and address" the deficit accordingly rests on a mechanism that is incapable of doing so, and the requirement of §156(b) of the NPPF for necessary infrastructure improvements in this respect remains unmet.
- 2.13 The same deficiency applies to primary provision. Dormansland Primary School is a one form entry school with a published admission number of 30, operating with 194 pupils against a capacity of 210, leaving headroom of around two places per year group. The 17 to 21 primary age children this development would generate on standard yield assumptions cannot be absorbed within that headroom, and no expansion of the school features in any Surrey County Council capital programme or district infrastructure plan. It is also not considered that incremental expansion on a one form of entry constrained village site funded by a per-scheme levy contribution is a realistic proposition. A CIL payment into the district's discretionary annual bidding fund therefore secures nothing for the school upon which the development would place immediate demand. The practical consequence is not mitigation but displacement, in direct contradiction of the walkable, sustainable village location upon which the Planning Statement's case under §155 of the NPPF depends. The applicant cannot rely on the village school's proximity to evidence sustainability while offering no mechanism to ensure its capacity to serve the development.
- 2.14 It is anticipated that reliance may be placed upon national pupil projections and the 2026 school census which record that primary rolls have been falling nationally since 2019, that secondary numbers fell in 2026 for the first time in a decade, and that the national school population is projected to decline towards 2031. School place planning is undertaken at planning area level and Surrey County Council's own school organisation data projects Year 7 demand within the Tandridge secondary planning area at approximately 790 pupils in 2028/29 against a combined published admission number of 755 across the borough's secondary schools. Local pressure therefore arrives, and exceeds capacity, at precisely the point this development would be occupied, regardless of the national trajectory towards 2031. The national decline is driven principally by falling birth rates and reduced net migration, concentrated in London and other urban areas, whereas demand within this planning area is a function of local housing delivery, which the applicant itself contends is accelerating through the recent permissions upon which its housing land supply case relies.

2.15 In respect of healthcare, Dormansland has no GP surgery and the village is served by Lingfield Surgery. The capacity position of that practice is already a matter of record. NHS Surrey Heartlands ICB has identified the need for additional primary care provision within its catchment, having set out its requirements for a new GP surgery within the 107-unit Lingfield House scheme recently allowed on appeal. The addition of a further 69 dwellings, generating in the order of 165 or more new residents, would place additional demand upon the same practice. The application documents make no assessment of the cumulative demand arising from Lingfield House, or other recent decisions in the locality, which are cited by the applicant solely as favourable precedents on housing land supply and Grey Belt status with their combined burden on shared education and health infrastructure being ignored.

2.16 The Parish Council considers that the sole mechanism offered in mitigation, that is CIL, is not capable of being relied upon, since CIL is not currently linked to any particular project and no sum is secured for the specific schools or surgery affected. The applicant states that funds "could then be invested in improvements to local GPs and schools", concedes as much. The golden rules at §156(b) of the NPPF require necessary improvements to local or national infrastructure to be made. An unquantified, discretionary levy set against a conceded capacity deficit and an unassessed cumulative position does not satisfy that requirement. Compliance with the golden rules is accordingly asserted rather than demonstrated, the significant weight claimed under §158 of the NPPF is not engaged, and the unmitigated pressure on education and healthcare infrastructure constitutes an adverse impact which should carry material weight.

3. Other matters for consideration

3.1 The Parish Council notes that the applicant recognises that NPPF Footnote 7 assets and areas play a role in establishing whether the application site can be classified as Grey Belt. Footnote 7 identifies policies relating to areas at risk of flooding as policies for protecting areas or assets of particular importance. The Parish Council notes that the Lead Local Flood Authority (LLFA), as the statutory consultee, has objected to the application on the basis that the proposed surface water drainage strategy does not comply with §181 and 182 of the NPPF, the accompanying Planning Practice Guidance or the National Standards for Sustainable Drainage Systems. The LLFA concludes that insufficient information has been provided to demonstrate that flood risk will be appropriately managed and that the proposal should therefore be refused unless these deficiencies are resolved.

3.2 Whilst the site is not located within Flood Zones 2 or 3, Footnote 7 is not confined to fluvial flood zones but extends to policies relating to areas at risk of flooding. Until it has been demonstrated, through an acceptable site-specific drainage strategy, that the proposal complies with the flood risk policies of the NPPF, the decision-maker cannot proceed on the basis that the Grey Belt provisions are engaged. The unresolved objection from the LLFA is therefore a material consideration in determining whether the proposal satisfies the policy framework applicable to Grey Belt development.

3.3 The Parish Council's position remains that additional transport evidence is required prior to determination. In the event that the application is approved the Parish Council requests conditions securing the appropriate outcomes of the additional transport evidence providing it is accepted as appropriate including:

- ATE compliant Travel Plan with monitoring five years beyond final occupation;
- Walking, wheeling and cycling infrastructure and the New Farthingdale link before first occupation;
- Highway works and the 20mph TRO in force before occupation with a fallback mitigation scheme if the TRO is not made.

3.4 The Parish Council also supports the LLFA recommended conditions in the event that the application is approved and requests that any permission is subject to a robust Construction Traffic Management Plan. This should identify approved construction vehicle routes, restrict HGV movements during school drop-off and pick-up periods and other peak village activity, specify construction working and delivery hours, and include appropriate measures to minimise disruption to local residents, highway users and the day-to-day operation of the village throughout the construction period.

3.5 The Parish Council considers that appropriate education and healthcare contributions alongside affordable housing and open space governance are obligations that need to be secured. The Parish Council would be willing to discuss the future adoption and management of the proposed public open spaces and other community areas, where appropriate and subject to mutually acceptable terms. If adoption by the Parish Council is envisaged, it should be a party to any Section 106 Agreement dealing with those areas so that it can help shape the specification, management and transfer arrangements and ensure that the obligations are practical, adequately funded and capable of being delivered over the long term.

4. Conclusion

4.1 The Parish Council recognises the benefits advanced by the applicant, including the contribution of market and affordable housing in the context of the District's housing land supply position, the restoration of Farindons and the provision of publicly accessible open space. Those benefits attract weight. They do not, however, absolve the application of the requirement to demonstrate compliance with the policy gateway upon which it depends.

4.2 The sustainability of the location is asserted rather than evidenced. For the reasons set out at section 2, the Transport Assessment does not undertake the assessment of active travel expected by Active Travel England's standing advice, fails LTN 1/20 on the applicant's own traffic data, and rests upon a Traffic Regulation Order that cannot be assumed at this stage. This evidential deficiency goes directly to §155(c) of the NPPF and should attract significant weight against the proposal.

- 4.3 Not all of the NPPF's golden rules are met. The conceded secondary school capacity deficit, the absence of headroom at Dormansland Primary School, the position of Lingfield Surgery and the unassessed cumulative demand arising from other recent permissions are answered, only proposed to be dealt with by unquantified and unplanned spend of CIL receipts. Compliance with §156(b) is asserted rather than demonstrated, the significant weight available under §158 is not engaged, and the unmitigated pressure on education and healthcare infrastructure is an adverse impact attracting significant weight against the proposal.
- 4.4 The unresolved objection of the LLFA engages policies within Footnote 7 of the NPPF. While that objection stands, the decision-maker cannot properly conclude either that the site qualifies as Grey Belt under §155 nor that the tilted balance criteria at §11(d) is met, providing a clear reason for refusing the development as submitted. This matter attracts substantial weight and is, on the evidence before the Local Planning Authority, determinative.
- 4.5 The emerging DNP is at an advanced stage and its policies attract material and increasing weight under §48 of the NPPF.
- 4.6 Drawing these matters together it is clear that the delivery of market and affordable housing attracts substantial weight in the scheme's favour; the restoration of Farindons and the open space provision attract moderate weight; and the economic benefits attract limited weight, being common to most development of this scale. Against them, the unresolved Footnote 7 flood risk position, the failure to demonstrate a sustainable location and the failure to satisfy all of the golden rules each attract significant or substantial weight. On the evidence as submitted, the application should be refused. If, notwithstanding these representations, the Local Planning Authority is minded to approve the application, the conditions and planning obligations set out at section 3 are requested.