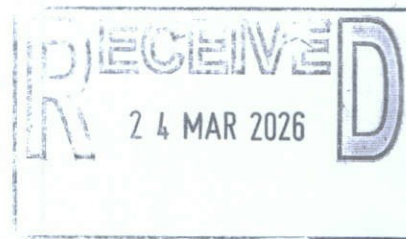


Thomas James, The Head of Planning
Tandridge District Council
Council Offices, 8 Station Road East, Oxted, Surrey, RH8 0BT



Date: 23 March 2026

RECORDED DELIVERY

Dear Mr James,

RE: Application 2025/1258 – Formal Notification of Environmental Zone E1 Classification

I am writing to formally alert the Planning Department to a fundamental **Procedural Error** in the applicant's submission.

The lighting strategy for the proposed 68 masts is predicated on a **Zone E2 (Rural)** baseline. However, on-site technical readings at **Weir Lodge** confirm that this location meets the criteria for **Environmental Zone E1 (Natural/Dark)** under the **Institution of Lighting Professionals (ILP) Guidance Note 01/21**.


The Legal Implications of Misclassification:

1. **Strict Compliance:** Under **Zone E1**, the "Upward Light Ratio" (ULR) must be **0% (Absolute)** and post-curfew "Light Intrusion" (Ev) into windows must be **0 Lux**. The applicant's 5700K LED proposal is physically incapable of meeting these E1 mandates due to Rayleigh Scattering and Source Intensity.
2. **Material Misrepresentation:** If the Planning Committee determines this application based on an "E2" assumption, the resulting decision will be based on a **material error of fact**.
3. **Judicial Review Risk:** Proceeding with an "E2" classification in the face of "E1" evidence constitutes a failure of due diligence. This renders any subsequent grant of permission vulnerable to a **Statutory Challenge** or **Judicial Review** on the grounds of irrationality and procedural unfairness.

Our Formal Demand: We demand that the Council instruct the applicant to resubmit their Lighting Impact Assessment using a **Zone E1 Baseline**. This must include a specific **"Zero-Intrusion" guarantee** for all receptors on Blackberry Lane.

Until this misclassification is corrected, the Council is not in a position to lawfully determine this application.

Yours sincerely,


Paula Cox
Weir Lodge, Blackberry Lane, Lingfield, Surrey, RH7 6NG

CC: The Planning Development Manager, Paul Batchelor; The Case Officer, Errol Reid; Chair of the Planning Committee, Cllr Claire Blackwell; Blackberry Lane residents

Thomas James, The Head of Planning
Tandridge District Council
Council Offices, 8 Station Road East, Oxted, Surrey, RH8 0BT
Date: 23 March 2026

RECORDED DELIVERY

Dear Mr James,

RE: Application 2025/1258 – Formal Demand for Deferral: Notice of Insufficient Evidence

In addition to my letter *Re: Application 2025/1258 – Formal Notification of Environmental Zone E1 Classification* dated 23 March 2026, I am writing to issue a **Formal Demand** that this application be immediately removed from the current committee cycle and deferred. The application, in its current form, is **evidentially incomplete**, rendering any decision made by the Committee procedurally flawed and vulnerable to legal challenge.

We demand that the application be deferred until the applicant provides the following missing material evidence:

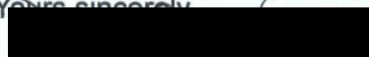
1. **A Full BS 4142:2014 Noise Assessment:** To include specific "character penalties" for impulsive peaks and tonal noise during the 21:00–21:45 breakdown period. An average (L_{Aeq}) is not an acceptable measure for night-time startle noise at a <1m-81m residential receptor.
2. **A Comprehensive Logistics and Plant Management Plan:** Detailing the movement, idling, and acoustic impact of starting gates, telescopic camera cranes, broadcast vans, tractors, ambulances and support vehicles.
3. **A Comprehensive Traffic Dispersal Plan (TDP):** Specifically addressing the high-velocity "exit pulse" of racegoers and heavy horse boxes onto unlit, narrow rural lanes between 21:00 and 22:00.
4. **A Revised Lighting Plan Capped at 3000K (Warm White):** To align with ILP **GN01/21 Zone E1** requirements and the **BCT/ILP 08/23** ecological mandate. The current 5700K proposal is a verified neurobiological and ecological hazard.

Procedural Warning:

Until this data is provided, the Council is in breach of its **Duty of Inquiry**. Determining this application on the current "under-evidenced" submission would constitute a **Procedural Error**. We formally demand that a new 21-day public consultation period be triggered once this missing information is submitted, to allow for professional scrutiny of the new data.

Failure to defer will be cited as a primary ground in any future application for **Statutory Challenge or Judicial Review**.

Yours sincerely,


Paula Cox

Weir Lodge, Blackberry Lane, Lingfield, Surrey, RH7 6NG

CC: The Planning Development Manager, Paul Batchelor; Chair of the Planning Committee, Cllr Claire Blackwell; Blackberry Lane residents