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20th March 2024

Dear Sir,

Planning Application: MO/2024/0096

**Location: Land north of Lower Road and west of Little Bookham Street,
Bookham**

Description: Outline application with all matters reserved except for means of access for a residential led mixed use development

The Bookham Residents Association strongly objects to this Application. There is outrage from the residents of Bookham at the serious adverse impact this application would have on their lives if it were to be approved.

There are many reasons why we have concluded that this major planning application should be refused. This letter summarises our objections and concerns. The letter contains four appendices in which those concerns, questions and objections are detailed. In total we have identified at least 25 points that must be properly considered and responded to by the Council to show residents that their objections have been addressed and how they have been addressed. These are highlighted in bold in the Appendices.

Firstly, we have serious concerns about the affects the proposed development will have on Bookham's infrastructure, especially when considered in association with other approved developments that are situated within 2/3rds of a mile of this land. Savills Planning report for the applicant identifies approximately 600 new potential dwellings along the section of Lower Road to Effingham.

In Appendix 1 there is detailed analysis by the BRA on the applicant's transport assessment. The analysis concludes that traffic volumes along Lower Road would be increased by approximately 50% which will create major problems, making congestion a major issue especially in the vicinity of the development; increasing pollution levels; and creating a less safe environment for pedestrians and cyclists, especially for children when on a trip to or from school. It also examines the proposed access to the site.

We are also concerned that an additional 200 dwellings together with 3 gypsy and traveller pitches will place increased stress to residents in terms of its adverse impact on the availability of school places for children in the village; and the lack of capacity in health facilities, especially doctor's surgeries.

Secondly, the development is proposed on Green Belt land at a time when it is widely accepted that new housing should be limited to brownfield sites where possible, a strategy that



central government strongly promotes. It will adversely affect the nature of Bookham as a village and can be seen to be a major step to merge the village with Effingham to the west.

We acknowledge that the draft Local Plan contemplates releasing part of this site from the Green Belt, but the Local Plan remains a draft which may or may not be approved by the Government Inspector. Therefore, it follows that this land remains in the Green Belt at present. Notwithstanding this the applicant is proposing to build a Community building, some housing and Gypsy/Traveller accommodation upon land that will remain in the Green Belt irrespective of whether the Local Plan is approved or not. This is not acceptable use for Green Belt land. Introduction para 4 of the NPPF makes it clear that it must be read in conjunction with the Traveller Site policy and makes it clear that the stationing of caravans for a traveller's site is inappropriate development on Green Belt land. (This is not discriminatory against travellers because residential development of any kind and by anyone is deemed inappropriate in the Green Belt).

I have attached in Appendix 2 our detailed analysis of this issue and its impact on Bookham, its residents, its wildlife, and natural environment.

Thirdly, the proposed development will affect valuable heritage assets and potentially affect the number of trees on the land. In Appendix 3 attached we have analysed these issues which clearly demonstrate that the applicant has not properly examined them.

Lastly, and very importantly, we have serious worries about how a development of this nature will affect drainage and sewage in the area, as well as its adverse effect on the chalk streams that run through the land. Bookham has a high water table and there are continuing problems of flooding and raw sewage spills in the vicinity. These problems increased when Thakeham built The Saddlery adjacent a few years ago. An additional 200 dwellings, a Community Building, car park and new roads will exacerbate these problems.

This is discussed in Appendix 4 a comprehensive report analysing the effects that a development will on this important land and how it will affect both the site and adjoining lands and how it will have serious environmental effects.

The above summarises the key issues. The four Appendices attached provide detailed analysis and evidence that are fundamental to explaining why this application must be refused and also bringing to light inadequacies in the documents that the applicant has produced within its planning application.

It is important to recognise that the application has been submitted prior to receiving the government's Inspector report on the examination of the Council's draft Local Plan, especially in light of the recent publication of the Government's NPPF, and the government's stance on avoiding development on Green Belts and promoting the development of brownfield sites. We understand that MVDC has not updated its identification of suitable brownfield sites since 2017. In the last seven years the country's economic characteristics have substantially changed which common sense dictates will have created increased potential for brownfield sites within Mole Valley especially in its larger towns.

The BRA also have concerns that as an Outline Application with all matters reserved except for means of access, makes a full appraisal of its potential adverse effects quite difficult, so



we have focussed on the obvious issues but suspect that many others may emerge once the reserved matters are published.

Furthermore, the nature of the proposed dwellings, and the basis of financing the management of completed development including the potential community assets and park are unknown and, having regard to examples elsewhere, may result in the local community bearing unexpected and continuing costs whilst the developer makes substantial profits and sets up a future income flow.

Yours faithfully

A handwritten signature in black ink that reads 'Keith Whale'. The signature is written in a cursive style with a horizontal line underneath the name.

K Whale
Chairman Planning Sub Committee.

Cc Cllr Monica Weller, Cllr Elizabeth Daly, Cllr Roger Adams, Cllr Paul Kennedy, Cllr Andrew Matthews, Cllr Christine Miller, SCC Cllr Clare Curran, MVDC Planning Department, Alex Bagnall.

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APPENDIX 1 – TRANSPORT ASSESSMENT

1 Summary of Key Concerns

Key concerns of the Bookham Residents Association with the Transport Assessment by i-Transport for Thakeham Homes and discussed hereunder are primarily related to traffic flows and the accesses/ egresses to/ from the development:

- Whilst the traffic counts purport to cover several days, the data tables made available are all dated as being Tuesday 28th November. All data should be made available, showing source counts and aggregation.
- The rate of trip generation per household is low and not consistent with that used in previous transport assessments by Motion and Glanville for the neighbouring developments in Effingham, feeding onto the same roads. The lower rate used by i-Transport understates the traffic impact. Applying a higher rate of trip generation as used by Motion and Glanville increases the impact of traffic flows on the Lower Road after development to +40% (compared to now) west of the Preston Farm junction and +45% east of it.
- Furthermore, the rate of car ownership in Mole Valley is higher than both in Surrey as a whole and the national average. The limited public transport in the area exacerbates this. The higher rate of car ownership together with limited public transport alternatives increases the rate of trip generation above that derived from a wider regional average.
- Traffic flow projections along Rectory Lane and the Lower Road do not reflect the real situation with effectively single lane flows at peak times from road width restrictions and parked vehicles throughout the school day during term time respectively.
- The very short distance between the new Preston Farm access junction and the Preston Cross mini-roundabout impacts the free-flow of traffic adversely. Eastbound traffic on the Lower Road queueing at the Preston Cross mini-roundabout may at peak times restrict traffic from exiting Preston Farm.
- When buses stop at either the new westbound or eastbound stops close to the Preston Farm entrance, a queue of vehicles will build rapidly and will impact traffic flows.
- The traffic flow projections do not make allowance for residents driving children to/ from school. We believe that this is unrealistic and does not recognise factors such as parents' preferences for particular schools, awarding of school places, siblings already in school and distances to schools.
- No traffic from the Community Facility or the SANG is included. Users of both will generate traffic, including in peak hours.
- Increased traffic will have an adverse impact on air quality and particulates in water courses.
- We understand that the travellers' pitches will be *settled*, in which case the proposed access from Water Lane will not work. Water Lane is too narrow for the size of commercial vehicle used to deliver the mobile homes and the swept paths in the Assessment have been based on a smaller caravan towed by a car.
- The shortest route for cyclist and pedestrian users of the proposed route via Fox Lane will lead to many going along Burnhams Road, which is a private road.

We have estimated in Section 12 that the cumulative impact of the above after completion of the Effingham developments combined with Preston Farm may be an overall increase in traffic to the west of the Preston Farm junction in the AM peak hour of +46% compared to now, rather than the +33% in TF7 in the Transport Assessment, and to the east of +58% compared to now, rather than the +37% in TF7.

We believe that the Transport Assessment and the Strategic Highway Assessment by Surrey County Council require updating to reflect the above.

2 Survey Data

The Transport Assessment states in Sections 3.4.5 and 7.3.1 that automatic traffic counts were conducted in November 2023 over a week and manual counts on weekdays over a period from Tuesday – Thursday. However, the data tables provided in Appendix C in Part 3 are all labelled as being on 28/11/23. If this is the averaged data of several counts, then the source counts of the individual days must be provided so that the spread within the data can be reviewed and how it has been averaged.

Location	Type	Duration	Evidenced
Lower Road	Auto-matic	1 week	No separate counts identified as ATC.
Water Lane	Auto-matic	1 week	
Preston Cross	Manual	Tues – Thurs counts 0700 - 1000 and 1600 – 1900	All data of counts on pages 72-78, 80 – 90 in Appendix 3 of the Transport Assessment is labelled as Tuesday 28/11/23.
A246/ Rectory Lane	Manual	As MCC 1	

In a meeting with Surrey County Council (minute 9.1 of 21/11/23), it was recorded that these counts would follow imminently in late November and early December. A single date of 28/11/23 is not consistent with this.

We request that all count data is made available to be validated.

3 Trips per Household

3.1 Trip Generation Rate

The rate used for trip generation per household has been based on the TRICS surveys. We have noted that the rate for trip generation per household is low compared to those used by Motion and Glanville, also derived from TRICS surveys, in their separate studies for the approved schemes in Effingham. Furthermore, the rates of trip generation used by both Motion and Glanville for the Lodge Farm/ Effingham developments are consistent with each other. Had the latter rates been used by i-Transport, the effect would be to increase the projected traffic flows on the Lower Road, Rectory Lane, Preston Cross mini-roundabout and other highway infrastructure. I-Transport proposes an even further reduced rate in its 'Vision' projections (discussed in Section 3.2 over page).

The assessment by Glanville was for application GBC 14/P/02109 covering three sites in three phases; initially 310 dwellings across Browns Lane, the playing fields to the north of the existing Howard of Effingham School and finally the existing school site (a total of 295 was approved). The assessment by Motion for application GBC 21/P/01306 considered a further 110 dwellings on land at Lodge Farm plus 4 self-build dwellings on land at 408-410 Lower Road. These were in addition to the previously approved 295 dwellings and bring the total to 409 dwellings.

As i-Transport quote a single overall rate, whereas the other assessments differentiated between the types of housing (*Open Market vs. Affordable*), we have averaged the rates in the latter on the basis of 40% affordable housing (this being the mix quoted by Savills in the Final Planning Statement dated January 2024). Through this, the trip generation rate used by Motion and Glanville is 20.6% higher than i-Transport's 'Vision' rate, meaning that, if applied, the projections in i-Transport's TF3 – TF8 would be proportionately higher and queueing at junctions may be worse to a similar degree.

Source	Type of Housing		Averaged car trips per household
	Open Market	Affordable	
Preston Farm – i-Transport			Baseline (Table 7.1 of Transport Assess.) = 4.32 Vision (Table 7.2 of Transport Assess.) = 3.88
Lodge Farm – Motion	5.32	3.73	Averages 4.68 on 40% Affordable & 60% Open Market
Berkeley Homes – Glanville	5.32	3.70	

The validity of making such an alignment is demonstrated in Section 8 where we compare the traffic counts within the three transport assessments using data for the Preston Cross mini-roundabout.

3.2 Long-Term Vision Rate

The long-term 'Vision' rate of trip generation assumes an overall reduction in trips and that many journeys, such as going to Bookham Station, are on foot. As commuter journeys are in the dark for over four months of the year, even such short trips may be driven on account of concerns for personal safety, particularly on unlit footpaths or cycle routes. Similarly, journeys by residents attending evening activities are commonly driven apart from the summer months when it is light late into the evening; personal safety is cited often as a concern. We do not believe that the trip rate reflects this adequately.

3.3 Car Ownership

The rates of car ownership within the selected regions and areas for the TRICS data used by i-Transport are lower than Mole Valley. The areas selected for the data tables in the Transport Assessment were from the Southeast, Southwest, East Anglia, East and West Midlands, Yorkshire, the Northwest and Durham. We have compared over page the rates in these areas to that in Mole Valley, based on ONS data.

	Region/ Area	Source	Average Rate of Car Ownership per Household
A	Southeast only	ONS Census 2021	1.42
B	Selected regions excl. South-east	ONS Census 2021	1.34
C	All selected as above by i-Transport and listed in Appendix A		1.36
D	Mole Valley	ONS Census 2021	1.54
E	% increase Mole Valley over all regions selected by i-Transport		13.2% (D cf. C)
F	% increase Mole Valley over regions selected excl. Southeast		15.0% (D cf. B)

Therefore, an estimate of trip generation based on the source data used by i-Transport may give a 13.2% lower result than one based on Mole Valley only, or an even larger difference depending on the weighting of the other regions outside of the Southeast.

Whilst the trip generation rate used by Glanville in its 2014 Transport Assessment was higher than i-Transport's, we noted that the regions, and thus areas within them, selected for the TRICS data also reflected a marked bias away from the Southeast.

Region	Number of Areas Selected within Each Region
Southeast	1
England – other regions	6
Ireland	6
Ulster	2

The rate of car ownership in Bookham is reflective of the limited public transport apart from the train services radiating from London. The only bus service is between Guildford – Bookham – Epsom, with none running to Reigate or Cobham. Travel by public transport to adjacent Reigate or Cobham entails lengthy train journeys with changes.

4 Traffic Flow

4.1 Road Widths

The assessments of traffic flow along Lower Road and Rectory Lane treat them both as having two free-flowing lanes:

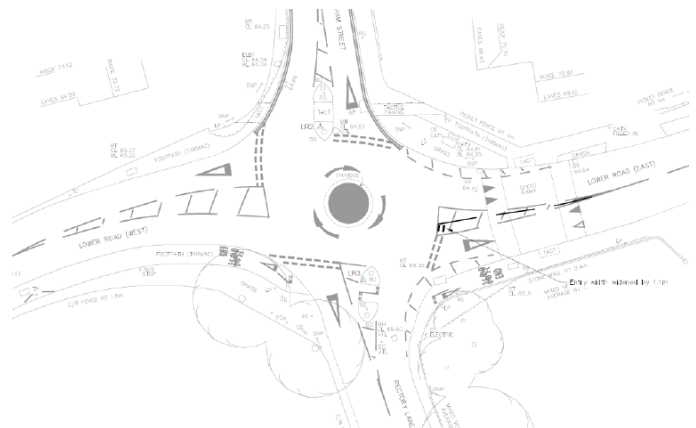
- Rectory Lane is stated in Section 3.4.4 in the Transport Assessment as being wide enough at its southern end for two cars to pass. This is not the case in the middle section as the size of the average car or SUV necessitates one vehicle to pull over, so in practice it operates as single lane with passing. Towards its northern end, there is a traffic restriction reducing it once again to a single lane. These delays can be exacerbated by HGVs, as the route is designated also as the HGV route to reach the Bookham Industrial Area.

- Widening of Rectory Lane would be challenging for SCC as there is parkland on one side and quality farmland with chalk streams on the other, plus the required installation of street lighting would require upgrading of the electrical network. We understand there to be no such plans at present, with previous plans having been shelved. If correct, this contradicts the statement in Section 3.2.3 of i-Transport's Travel Plan that Mole Valley Local Transport Strategy Forward Programme includes a scheme to extend the 1.2m footway all the way to the A246.
- We understand a further complication of widening Rectory Lane to be that its junction with the A246 would also require re-configuration, further increasing cost.
- West of Water Lane, the Lower Road is reduced to single lane all day on weekdays in term-time by parked cars. This is likely to continue even if the Howard of Effingham School development progresses with onsite parking as the Lower Road would remain an easy drop-off/ pick-up point, though there is one planned within the development. The Lower Road may remain the quicker alternative preferred by parents. We understand that SCC Highways would be resistant to installing any further stopping/ parking restrictions along the Lower Road, beyond those in place already.
- When buses stop on the Lower Road, traffic needs either to wait behind the bus or overtake when it is safe to do so. This slows traffic flow. This will remain the case with the new bus stops as proposed and unless bus laybys were to be created, which could be difficult. The rate of traffic build-up in the AM peak hour behind a stopped eastbound bus at the stop nearest the Preston Farm junction may be up to 9 cars per minute and up to 12 per minute behind a stopped westbound bus at the stop nearest the Preston Farm junction (based on the traffic flow projections of i-Transport in TF7)

4.2 Preston Cross

Although there is a reference within the Transport Assessment to an improvement scheme for this mini-roundabout, we understand that the widening of the pavement and white-lining carried out already may be the extent of planned works by SCC Highways. If so, there are no further works planned that will improve traffic flow rate through the roundabout and so Preston Cross will remain a source of potential congestion.

Indeed, Motion's Transport Assessment for Berkely Homes (document *Lodge Farm – 21P01306 -Transport Assessment - 1712403*) noted the Preston Cross mini-roundabout as being 'inadequate' to cope with increased flows from any development (either within the Effingham sites or Preston Farm) without improvement works.



4.3 Queuing at Junctions

The modelling of traffic flow by i-Transport and that of queueing at junctions appears to assume that the traffic exiting a junction can move away freely. Application of the restrictions noted in Section 4.1, together with a higher trip rate as discussed in Section 3, will impact adversely queueing at junctions such as:

- Vehicles turning left from Preston Farm's new junction onto the Lower Road eastbound may be blocked by vehicles queueing at Preston Cross mini-roundabout, leading to southbound queueing within the new access road. The distance between the two is around 30m, allowing no more than 4 cars to queue eastbound (marked in purple below). Using i-Transport's projections in Table 7.7 of the Transport Assessment and reflected also in TF7, the queue may be 2.8 cars in 2028 in the AM peak hour with all developments. If these projections are adjusted simply in line with the increased trip rate per household used in the previous two assessments (as noted in Section 3.1), this queue increases to the maximum of 4 vehicles, beyond which point vehicles are prevented from exiting freely.



- Vehicles on Lower Road westbound may be unable to move away quickly from Preston Cross mini-roundabout on account of congestion either from the width restriction on Rectory Lane by Liberham Lodge affecting its southbound flow or, if continuing westbound, traffic turning right into Preston Farm's new junction or cars queueing behind a stopped westbound bus.

5 School Drop-Offs/ Collections

Surrey County Council agreed that the methodology of the assessment should not include any need to drive to local primary or secondary schools (minute 9.3 of a meeting on 21/11/23). We do not believe that this is a realistic assumption:

- Whilst the Preston Farm residents will be in the catchment area for the Howard of Effingham and St. Lawrence schools, the alternatives are more distant. The parents' choice of school may be affected by where the child is already, educational needs or religion.
- The new developments by Berkeley Homes, with a proposed 409 dwellings in Effingham, will also have children competing for places at the Howard of Effingham and St. Lawrence schools.
- When families with school-age children move into Preston Farm, they are likely to keep children in existing schools if they are living already within the area.

- Manor House is close, but it is private and less likely to be a choice for the 40% in affordable housing.
- If families were unsuccessful with entry to the Howard of Effingham School, the state sector secondary alternatives are primarily in Leatherhead.
- If younger families did not enrol in St Lawrence for any reason or could not get a place, Great Bookham and Eastwick Infants & Junior School are 1.0 – 2.0km distant.
- Between 25% - 30% of families in Bookham already send their children to independent schools outside of Bookham. A number of these schools are in Guildford, Epsom and Cobham areas.
- For a family with children at more than one school, driving will be their primary choice as it may be the only timely way to make drop-off/ collection times at all schools, especially when younger.

Therefore, we believe that the traffic flows in the Transport the Assessment should be re-modelled to reflect a more realistic rather than 'idealistic' scenario.

6 Community Facility & SANG

6.1 Community Facility

The new Community Facility is stated within the application as serving residents of Preston Farm and attracting them on a day-to-day basis, implying without external use, so not generating any additional traffic. Whilst the initial requirement was to be capable of accommodating early years education needs, within the Main Modifications to the Local Plan there is the proposal that it should be suitable for other Class E or F uses. This is bound to generate external traffic. Early years education would create traffic within the peak hours.

Other classes of use may generate traffic across other periods of the day as well as in the peak hours. This should be reflected in the modelling.

6.2 SANG

Neither does there appear to be additional traffic associated with the SANG, even though this has an associated car park. As residents in Preston Farm will not need to drive to the SANG, the car park must be for external users. Whilst some of this use will be throughout the day when other traffic volumes are lighter and thus will be of little impact, the early morning user/ dog-walkers external to Preston Farm would coincide with AM peak hour traffic for commuters and school runs.

This should be reflected in the modelling, especially for the AM peak hour.

7 Projected Increases in Traffic

7.1 Peak Hour Increases

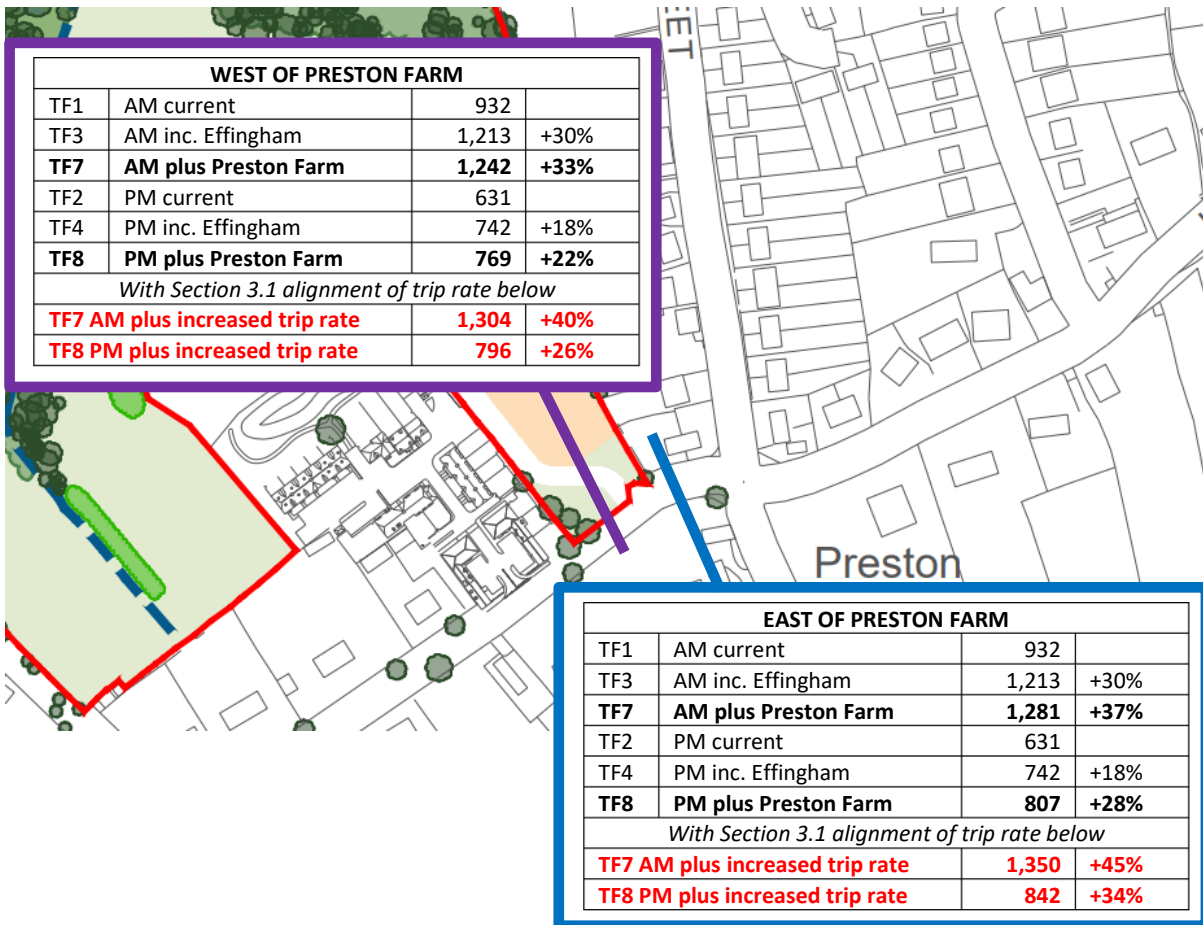
Projections TF1 and TF2 in the Transport Assessment set out i-Transport's baseline counts of current traffic - TF1 for the AM peak hour and TF2 for the PM peak hour. These are adjusted then in TF3 and TF4 respectively to reflect the impact of the previously approved developments in Effingham, which add a combined total of 409 dwellings. The impact of Preston Farm is overlaid in TF7 and TF8 respectively. Thus, a comparison of TF7 against TF1 gives the cumulative increase in AM peak hour traffic when Preston Farm is completed in addition to the previously approved developments in Effingham.

We have summarised over page the impact of these two-way counts just west of the proposed Preston Farm junction (refer to purple table over page) and east of it (refer to blue table over page). The percentages are the increases on the current traffic flows as reflected in TF1 and TF2. The cumulative impacts in the AM peak hour projected by i-Transport are +33% west of Preston Farm and +37% between the Preston Farm junction and Preston Cross. The PM peak hour impacts are +22% and +28% respectively; the evening peak is lower as the commuting and school peak are less coincident than in the morning.

7.2 Impact of an Increased Trip Rate

As noted in Section 3.1, the trip rate per household used by i-Transport is considered to be low. If it is aligned with the trip rate in the transport assessments by Motion or Glanville for the nearby schemes in Effingham, all of which use the same road network, then the increase (in red text overpage) in the AM peak hour is +40% just west of the proposed Preston Farm junction and +45% for the short section leading from it to Preston Cross. Similarly, the PM peak hour is less at +26% and +34% respectively. These increases are calculated by applying the higher trip rate to the increase in traffic count projected by i-Transport in moving from TF1 to TF7 and TF2 to TF8.

When the traffic increases are considered in combination with cyclists and pedestrians on the Lower Road, these increases may affect road safety adversely, even if just from more pedestrians and cyclists needing to cross the main vehicular thoroughfares at defined points.



7.3 Congestion Increases Non-Linearly

A further factor that should be considered is that the ability of traffic to flow freely is not necessarily a linear relationship to volume. Traffic can increase, with congestion increasing linearly, until the volume reaches a critical point beyond which the flow reduces disproportionately.

This may be through factors such as:

- As noted in Section 4.3, four cars heading eastbound on Lower Road can queue between the exit from Preston Farm and Preston Cross, but a fifth car will block it.
- Any westbound car turning into Preston Farm will block Lower Road westbound until it has turned, crossing the eastbound flow. This interrupts both flows on the Lower Road.
- When traffic moves away from a stationary position, the spacing of cars increases so traffic moves in a concertina fashion when delayed.
- When cars have to give way in *single lane with passing flows*, such as in Rectory Lane or along Lower Road by the Howard of Effingham School, the delay can be worsened by a driver trying to push forward and another then needing to reverse.
- When a bus stops on Lower Road, if vehicles cannot overtake because of heavy traffic in the other direction, the hold-up will be the time to load and disgorge passengers. As noted in Section 4.1, the rate of traffic build-up behind a bus stopping at the westbound stop by the Preston Farm junction may be in the region of 12 cars per minute. Thus, a stop of less than one minute would back-up as far as Preston Cross mini-roundabout. The surge of cars behind an eastbound bus may temporarily block the Preston Farm junction.

Hence there is a point at which a small increase in the volume of traffic has a disproportionate impact on traffic congestion.

7.4 Air Quality

The increases in traffic and queueing will have an adverse impact on air quality, either from exhaust of fossil fuelled vehicles or the increased generation of particulates by the heavier electric vehicles, especially when braking and turning. The latter may pollute further the water courses as they wash off the road surfaces in heavy rain.

8 Comparison of Source Data

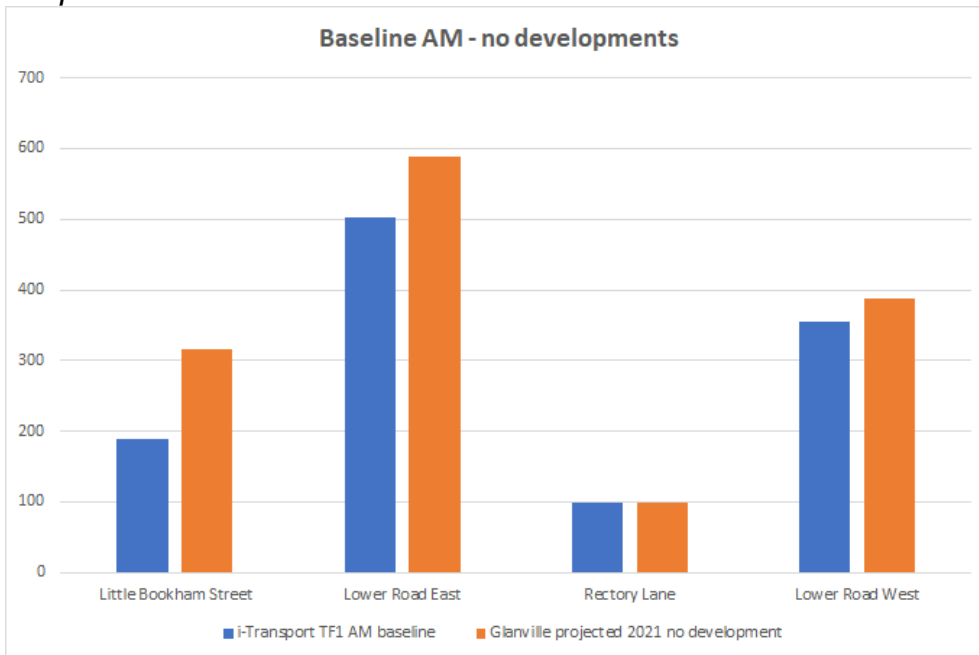
We have endeavoured to compare the traffic flows projected by i-Transport for Preston Farm before and after development with those projected by Motion for Berkeley Homes prepared in 2021 (*GBC 21/P/01306 – Transport Assessment - 1712403*) and by Glanville for Berkeley Homes in 2014 (*GBC 14/P/02109 Transport Assessment Part 1 - 741201 through to Part 9 - 741213*). The data we extracted for this comparison has been the traffic count into the Preston Cross mini-roundabout, as it is readily discernible from all data tables by direction and as entry flows.

Both the i-Transport Transport Assessment in 2023 (used for Preston Farm) and the Glanville Assessment of 2014 show existing traffic volumes before any development, even in Effingham. The relevant data table for Motion 's Assessment is referenced but it is not included in its published appendix.

For the comparison over page, we have used the projection by Glanville for 2021 volumes. This is without any development but simply reflecting the increase in traffic from 2013 to 2021. The projected increase by Glanville from 2013 is consistent with national statistics for increases in traffic since then. The traffic growth used for this uprating was 9.3% for the AM peak hour and 8.9% for the PM hour.

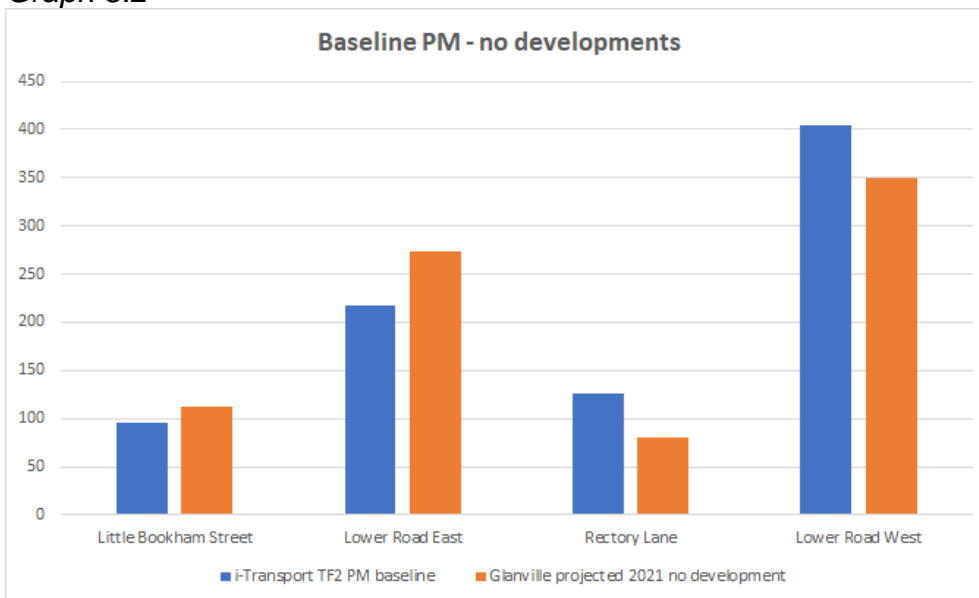
I-Transport's counts are shown in blue and compared to Glanville's 2021 figures in orange in Graphs 8.1 over page and 8.2 over page. Hence Graph 8.1 suggests for the AM peak hour a broad consistency for Lower Road West and Rectory Lane but suggests a lower base by i-Transport for Lower Road East and Little Bookham Street.

Graph 8.1



For the PM peak hour, Graph 8.2 suggests a smaller difference for Lower Road East and Little Bookham Street and a higher baseline by i-Transport for Rectory Lane and Lower Road West. The difference in Rectory Lane may be simply due to the expansion of the Grange and the development of Liberham Lodge.

Graph 8.2



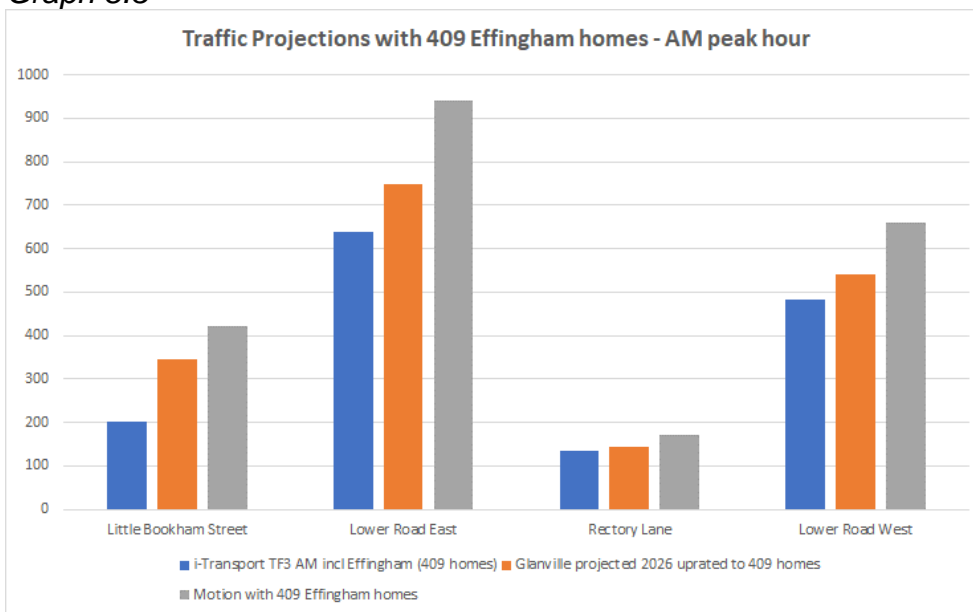
The projections for traffic after the completion of the schemes in Effingham is compared in Graphs 8.3 and 8.4 over page. For this we used:

- i-Transport data in TF3 and TF4 which assumes 409 new dwellings in Effingham. These are shown in blue.
- Motion’s projection for completion of the developments in Effingham is based also on 409 new dwellings. Their projections on the impact of an additional 114 dwellings in addition to the 295 approved previously, are introduced in grey.

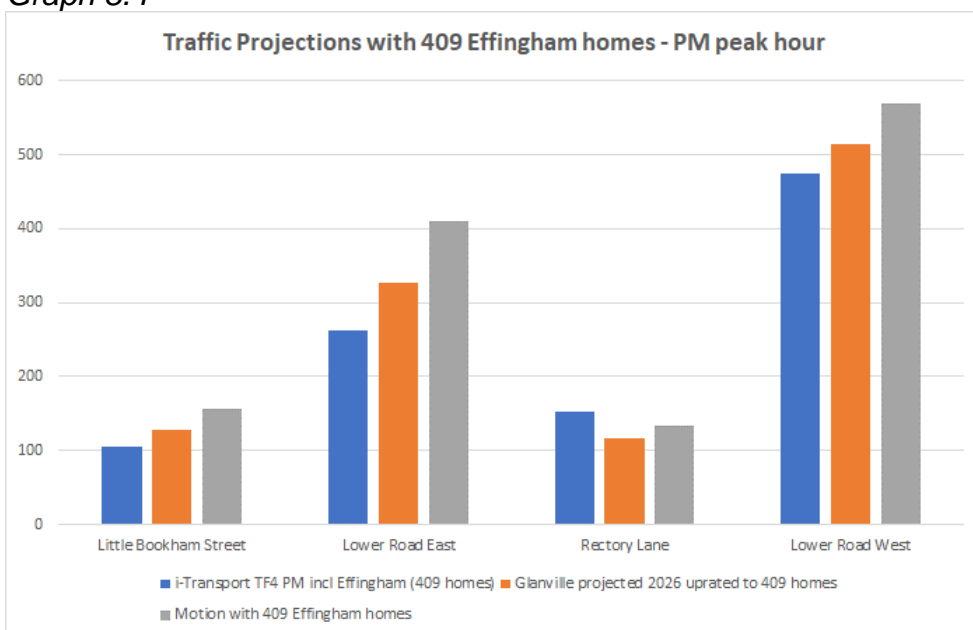
- The Glanville projection in its Transport Assessment was based on 310 dwellings in Effingham by 2026, of which 295 were approved. To compare against the others on a like-for-like basis, these figures have been adjusted for Graphs 8.3 and 8.4 to equate to 409 new dwellings in Effingham, with the additional 99 dwellings having the same rate of trip generation per new home, i.e. a linear rate of increase. These are shown in orange.

These graphs suggest that, based on such an analysis of the traffic flows at the Preston Cross mini-roundabout, the traffic projections by i-Transport prior to any development at Preston Farm are lower than those of both Motion and Glanville. This supports the argument that the greater increases in traffic through a higher trip rate, as discussed in Section 3.1 and shown in red in the Section 7.1, may be the more realistic and should be part of an assessment of the impact of the development at Preston Farm on the road network.

Graph 8.3

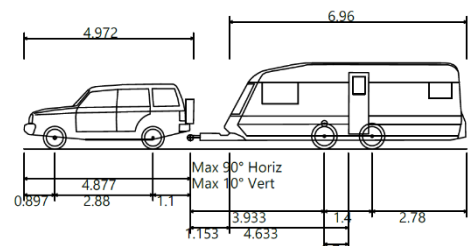


Graph 8.4



9 Water Lane Access for Travellers' Pitches

Water Lane is proposed as the access for the three travellers' pitches. The swept path shown in Drawing ITB8170-GA-026 in the Transport Assessment is based on a 7m caravan towed by a car, the maximum size permitted for a non-commercial vehicle (as per diagram to right). As such, the caravans are assumed to be 2.3m wide and towed onto site in a forward direction; they would be removed similarly with all turning undertaken on site.



However, we understand that the three pitches are planned to be for *settled* travellers, in which case the accommodation is normally a mobile home. Mobile homes of a single width unit range from 3.7 – 5.5m wide and 12.2 – 24.4m in length. They are brought to their static pitch on either a flatbed lorry or a low loader. Assuming even the narrowest width of home of 3.7m, transported on a flatbed of standard 2.9m width, we do not believe that the swept path shown is appropriate on account of the greater length and width. The route needs to be tested also for vertical clearance as the height during transport is greater.



Also, the wider vehicles could lead to damage to the land drainage ditch on the western edge of Water Lane; this ditch is critical to limiting flooding and keeping it passable. The refuse vehicles used currently for Water Lane are smaller vehicles, since the standard size of three-axle vehicle does not fit, implying that the moving of a mobile home through Water Lane would be challenging without widening works and more environmental damage in the Green Belt than is being proposed already. Larger vehicles on Water Lane may also affect the number of trees that would require felling to achieve the sweep on the turn into the designated area.

Furthermore, settled sites tend to have commercial vehicles as some families will run their businesses from the site. Such increased traffic movements by commercial vehicles will have an adverse impact on residents of Water Lane and the environment, especially if they are larger.

10 Cycle & Pedestrian Routes

10.1 General

The BRA welcomes the proposal in principle to reduce journeys by car and to make those on foot and by bicycle easier. There are two main pedestrian and cyclist routes proposed, one from the north of the development leading into Fox Lane and another from the southwest leading into Water Lane. To be used readily throughout the year, they will need to be well lit and engineered to be resistant to flooding.

10.2 Northern Route to Fox Lane

The Transport Assessment references a proposed pedestrian and cycle route between the northern end of the development and Bookham Station as being through Fox Lane and Burnhams Road. In Drawing ITB8170-GA-027, the public right of way is shown as entering Fox Lane. It does not show that the most direct exit from Fox Lane in the direction of Bookham Station is then along Burnhams Road, which is a private road (see red dashed line on map below). To continue on the public right of way from Fox Lane through to Heatherside Close (see green dashed route on map below) will take pedestrians and cyclists away from Bookham Station and thus it will not be the preferred route, except at night-time on account of Burnhams Road being unlit. During daylight hours, pedestrians and cyclists will naturally cut through Burnhams Road, to the likely frustration of its residents who are responsible for the road.



This route is suggested also as providing improved access to the Howard of Effingham School and thus also the major developments in Effingham, which will make it even busier. As there is no easily enforceable means of preventing pedestrians and cyclists cutting through Burnhams Road, this may be a festering source of conflict between residents of Burnhams Road and cyclists/ pedestrians.

It is unclear from Drawing ITB8170-GA-027 what improvement is planned for the pedestrian and cyclist route between the site boundary and Fox Lane. It is not shown as being upgraded and this short section becomes very muddy and prone to some flooding during periods of

rain. Lighting is a concern also if it is to be used by pedestrians and cyclists outside of day-light hours: concerns over personal safety in unlit areas are often a reason for driving short distances.

10.3 Southern Route to Water Lane

The route enters/ exits the development through an area in the southwest corner of Preston Farm, which is marked in other documents as being prone to flooding, so the surface will need to be engineered accordingly if it is to be usable year-round. We note the plans for visibility splays on the junctions with Water Lane and then Water Lane with Lower Road.

These will require regular maintenance to prevent their becoming overgrown.

11 Active Travel England

We note that the assessment thus far by Active Travel England is purely desk-based using the ATE toolkit, in which the proposed development 'fails' in the criterion of amenities within 800m.

We recommend that Active Travel England is invited to conduct its own and more detailed field-assessment.

12 Potential Increased Traffic Flow

12.1 Introduction

Previous sections in this commentary on the Transport Assessment have identified areas where we believe the traffic flows may be under-estimated. We endeavour below to draw these together and quantify the impact on the AM peak hour of this difference. These are through:

- The higher trip rate consistent with the assessments by Motion and Glanville.
- The higher rate of car ownership in Mole Valley (Section 3.3)
- Including school trips rather than their being excluded (Section 5)
- External users of the SANG and Community Facility (Section 6)

12.2 Car Ownership

The difference in the rate of car ownership in Mole Valley against those regions used to select the TRICS data was 13.2%. When projecting the impact of this, we have applied a dilution factor in Table 12.3, which reduces the net impact to provide a margin of caution. For example, a dilution factor of 25% reduces the impact of the higher ownership to 9.9%.

12.3 School Trips

To project the impact of including school trips, we have taken the split of dwellings by size and *Affordable* vs. *Open Market* from the Savills report and estimated the following:

- % of those dwellings with children. See Table 12.3.1 below.
- Of those dwellings with children, the % sending the children to private schooling. We have used the lower end of the range in Bookham. See Table 12.3.2 below.
- And of those dwellings with children in state education, the % with children neither going to St. Lawrence nor the Howard of Effingham for whatever reason. See Table 12.3.3 below
- Of those dwellings that thus might be driving children to/ from school, the % that would travel west along the Lower Road from Preston Farm. This has been taken to be the minority based on where alternative schools are.
- And the % of dwellings that are driving children to school for which the journey is combined with commuting. For the % that may be combining the trip with commuting, we have assumed that no additional journeys are generated. Otherwise, it is 2 trips within the AM peak hour (out and back).

Table 12.3.1

	Bedrooms	1	2	3	4+
Market	%ge	25%	45%	20%	10%
	homes	20	36	16	8
	% with children	0%	50%	70%	85%
Affordable	%ge	15%	45%	30%	10%
	homes	12	36	24	8
	% with children	0%	75%	90%	100%

Table 12.3.2

Homes with children in private schools	Market	25%
	Affordable	0%

Table 12.3.3

Children state educated not in Howard/ St Lawr & driven	Market	40%
	Affordable	40%

12.4 SANG

For the SANG, we have estimated the number of cars coming in the AM peak hour for a reason such as dog-walking. As these would be short duration stays, it is likely that the generation is 2 trips within the same hour. As with school traffic, there is a % assessment of how much traffic is coming from Lower Road west and returning that way.

SANG	AM peak hour	Cars	8
	Coming from west		20%
	Trips in peak		2

12.5 Community Facility

For the Community Facility we have considered the impact of an early years' facility where the children are left, as opposed to a playgroup which would be later in the morning and the parents remain. We have assumed that a few of the cars arriving may relate to staff and so the trip generation has been reduced from 2, since staff will be staying past the AM peak hour.

Community Facility	AM peak hour	Dropping	15
	Coming from west		20%
	Trips in peak		1.75

12.6 Consolidation

The consolidated assessment of the impact is shown below, with that west of the Preston Farm junction in blue and east in pink. The increase in traffic to the west in the AM peak hour could then increase by +46%, rather than the +33% in TF7 in the Transport Assessment, and to the east by +58%, rather than the +37% in TF7.

AM peak hour			Source	West of Preston Farm			East of Preston Farm		
Baseline			Transport Assessment	TF1	932		TF1	932	
After development			Transport Assessment	TF7	1242		TF7	1281	
Uplifted to Motion/ Glanville trip rate			This document	Sec'n 3.1	1304	40%	Sec'n 3.1	1350	45%
Increased car ownership	Sec'n 3.3	13.2%	This document						
	Dilution	25%	See Section 13.2						
	Apply	9.9%			37			41	
School trips impact	West	20%	See Section 13.3		13			52	
	Commuter %	20%							
SANG trips			See Section 13.4		3			13	
Community Facility			See Section 13.5		5			21	
Additional trips			Sub-total of above		58			128	
Previously uplifted			Uplift using Glanville trip rate		1304			1350	
Revised total trips			Total of above		1362			1478	
Increase vs. baseline			Comparison against TF1			46%			59%

We would question whether the Lower Road, Preston Cross mini-roundabout and environs can handle such a potential increase without unacceptable congestion or risks, such as to road safety or from frayed tempers of road users.

13. Strategic Highway Assessment

The Strategic Highway Assessment contained in Surrey County Council's Technical Note of January 2023 for the Lower Road was prepared prior to the approval of the additional 114 dwellings in application GBC 21/P/01306. It took as the baseline an approved 296 dwellings at the Howard of Effingham School and opposite, adding in Preston Farm with an adjustment for Grove Corner and then considered the impact of a further 114 dwellings from GBC



21/P/01306. Thus, the transport assessment by Motion was the most recent prior to the note and that for Preston Farm had not been submitted.

We recommend a review of the Strategic Highway Assessment in the light of the representations made in this commentary on the Transport Assessment for Preston Farm by i-Transport and the additional traffic volumes which we believe may result, beyond those reflected in the transport assessments completed to date.

APPENDIX 2 - GREEN BELT IMPACT ASSESSMENT

1 Introduction

The Bookham Residents Association strongly objected to the inclusion of Land northwest of Preston Farm DS8 in the Future Mole Valley Draft Local Plan (Proposed Submission Version – Regulation 19) A1. At every stage of the process, the BRA has made it clear that it opposes this level of release of the Green Belt.

The Bookham Neighbourhood plan was adopted by the Council on 23rd May 2017, after public consultation. The plan acknowledges that to date the village has contained all development within the existing boundaries and not infringed on Green Belt and it wishes that this is maintained. This is important as extension of the village beyond the Green Belt was not expected at any time and is opposed.

We believe that Bookham's Green Belt, including land at Preston Farm, currently enjoys significant protection under the National Planning Policy Framework ('NPPF'), as revised in December 2023, paras. 142 to 156, namely:

NPPF 142. The government attaches great importance to Green Belts. The fundamental aim of the Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

The Planning Application MO/2024/0096 was submitted prior to the Council voting to unpause the Draft Local Plan on 25th January 2024. Thakeham Homes in its Planning Statement para: 5.53 acknowledge that "whilst the site will formally remain in Green Belt until such time as the eMVLP is adopted" it requests to bring forward the residential development on grounds of "very special circumstances". We do not agree there are "very special circumstances" simply because MVDC is following the directions of the Department for Levelling Up, Housing and Communities to progress the Local Plan through examination in accordance with the letter from the Housing Minister, Lee Rowley, dated the 25th January 2024.

To the contrary, various 'Matters, Issues & Questions' ('MIQ') to be considered by the Inspector relating to the release of Green Belt land, which remain unanswered during the Local Plan Examination, could then be overlooked if the Council was to consider this application before the Inspector issues her final report and the Local Plan, subject to her recommendations, is adopted. Therefore, we would ask the Council to defer any decision until both of these two events happen.

The consultation on the Main Modifications ('MM') and the Council's Note 35 is running from the 1st March 2024 – 23rd April 2024. The Bookham Residents Association ('BRA') acknowledges that there is no Main Modification to remove DS8 Land northwest of Preston Farm in order to make the Local Plan sound. However, we await Inspector Barrett's final report, which will include her opinion on the soundness of the Council's approach to Green Belt Exceptional Circumstances discussed at Matter 3 Green Belt, Matter 9 Site Allocations Selection Methodology and Matter 10 covering the Site Allocation for Bookham and Land northwest of Preston Farm DS8.

In its assessment of harm to the Green Belt, we asked the Council to consider the additional 110 dwellings now granted permission at Effingham Lodge Farm which were under appeal

when the Inspector agreed the Main Modifications before the hearings closed on the 28/10/22. They were considered to impact on the Area BA at Preston Farm and we believe could increase the score for merging from *moderate* to *significant*. This was brought to the attention of Inspector Barrett during the Matter 10 hearing on the 25/10/22 by Mr Joel Semakula (Counsel) and he also raised the point that the Council's policy was that any site within a broad area with a 'significant' score for merging was eliminated at Stage 1 of the Strategic Housing and Economic Land Availability Assessment ('SHELAA'). The Inspector asked to be kept informed on the decision which was published on the 28/11/22. Therefore even if this decision did impact on the scoring of the Area BA at Preston Farm, no Main Modification could have been agreed by Inspector Barrett. We await her final report.

We would also remind the Council that Inspector Barrett was concerned that it had failed to consult the public on the Compendium of Minor Green Belt Boundaries, Updates & Alterations (MVDC 2022) (H16) which affects 51 properties in Little Bookham. Following the completion of the hearing sessions, she requested a further consultation (the Inspector's Consultation ED50) to allow representors a further 14 days to submit information. Inspector Barrett confirmed that she will take these comments into consideration in her final deliberation on the soundness of the plan. Therefore, any decision on this planning application would be premature because so many homeowners in Bookham are affected by boundary changes. This is another valid reason to await the Inspector's report and delay the Council's decision.

The land at Preston Farm provides a significant contribution to the Green Belt and forms an important wildlife corridor between Bookham and Effingham. Another concern for all our residents is the impact the development will have on all areas of land which are remaining in the Green Belt. We would ask the Council to ensure that the National Planning Policy Framework (NPPF) Section 13 'Protecting Green Belt Land' paragraphs 142 to 156 is respected in all areas of this proposed development, should it proceed.

143. Green Belt serves 5 purposes:

- a) to check the unrestricted sprawl of large built-up areas.*
- b) to prevent neighbouring towns merging into one another.*
- c) to assist in safeguarding the countryside from encroachment.*
- d) to preserve the setting and special character of historic towns; and*
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.*

It appears that Thakeham Homes is challenging the boundaries and has not taken on board comments from both the Council Officer and Inspector Barrett at the Local Plan Examination. Even if the Local Plan including DS8 is adopted, the BRA is surprised that Thakeham Homes is still proposing to develop an area of land which nonetheless remains in the Green Belt. This is the 2ha of land between Water Lane and the NNE side of The Saddlery, which the Council told Inspector Barrett during the Examination would **not** be developed. The illustrative Master Plan shows the position of Gypsy and Travellers pitches to be in the south-western part of the site with access off Water Lane together with the community centre and some residential dwellings within the 2 ha of land behind The Saddlery. NPPF para. 152 states "*Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances*".

There are **no** such very special circumstances, and we are shocked that Thakeham Homes is putting the Council under constant additional pressure to release extra land for development. Therefore, this application must be refused or sent back to the drawing board.

Nor is there evidence that Thakeham Homes has paid regard to NPPF para. 148 as this planning application does not give full consideration to rules with regards to “defining Green Belt boundaries”. Furthermore, we challenge its assessment of glimpsed views, amenity value and openness of the Green Belt.

The following documents have been referenced during our research:

- *Mole Valley Local Plan 2000*
- *Mole Valley Core Strategy 2026 (adopted 2009)*
- *NPPF revised December 2023*
- *Bookham Neighbourhood Development Plan (NDP)*
- *Draft Local Plan (Proposed Submission Version – Regulation 19) (A1)*
- *Green Belt Exceptional Circumstances Topic Paper (MVDC 2021) (H15)*
- *Green Belt Exceptional Circumstances Topic Paper 2 (MVDC 2022) (H16)*
- *Compendium of Minor Green Belt Boundaries Updates & Alterations (MVDC 2022) (A9)*

2 The Emerging Local Plan

The Emerging Local Plan (‘ELP’) is at an advanced stage and progressing towards adoption. Thakeham Homes write in para. 5.40 on page 34 of its Final Planning Statement of January 2024:

- a) The stage of preparation of the emerging plan (the more advanced its preparation, the greater weight that may be given);*
- b) The extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given)*

We accept that the Council will be giving greater weight to the ELP in light of the appeal decision on Sondes Place Farm. However, we would point out that each development site should be considered on its own merits and that the unresolved objections in relation to Land northwest of Preston Farm are indeed significant.

3 Council Policies EN1 & DS8

It is important to refer to Policy EN1: The Green Belt and Policy DS8: Land northwest of Preston Farm, Bookham.

3.1 Policy EN1

Policy EN1 (included as Annex 1) states in paragraphs 1 and 2:

- 1. Land which is designated as Metropolitan Green Belt will be protected against inappropriate development, as defined by national policy.*
- 2. Inappropriate development will not be permitted in the Green Belt, unless very special circumstances are demonstrated which are concluded to outweigh the potential harm, including harm to the openness of the Green Belt and the purposes of including land within it.*



We support the intention of paragraphs 1 and 2 to protect the Green Belt against inappropriate development, which should include development where there are no exceptional or special circumstances for its provision, or where a proposal would be inappropriate or result in harm.

We note that the Policy does not consider the provision of housing as a special circumstance to warrant development on Green Belt land. The Policy, as drafted, clearly demonstrates that only small scale and limited forms of development are appropriate on sites in the Green Belt by virtue of the over-riding value of the land. Hence, any allocation of Green Belt land for larger housing development falls contrary to the objectives of this policy.

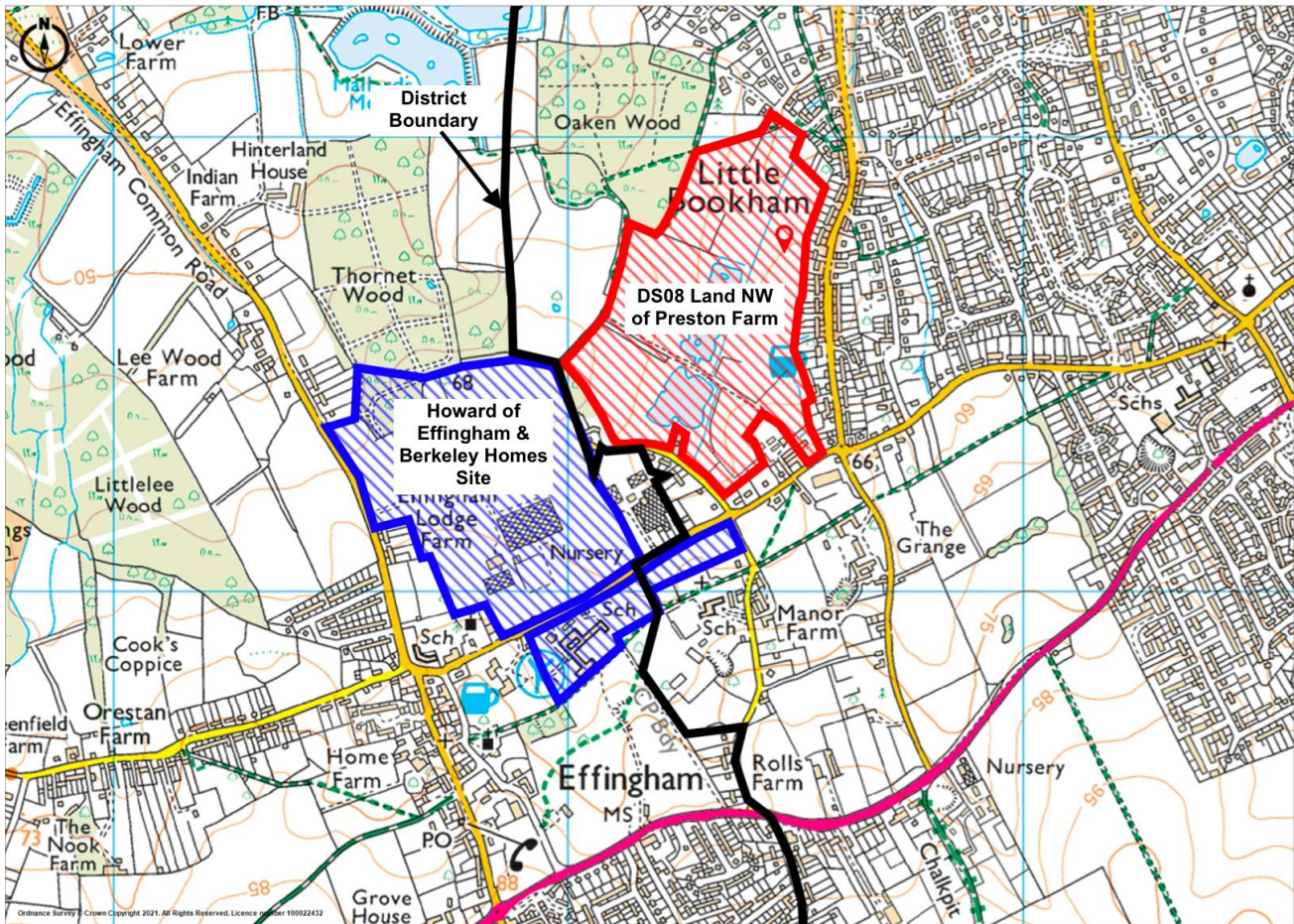
We consider Policy EN1 to be sound on the basis that it seeks to carefully restrict development in the Green Belt. The planning application on land at Preston Farm for residential development clearly does not accord with this policy and should be refused.

3.2 Policy DS8

The BRA objected to the allocation of Land NW of Preston Farm for residential led mixed-use development because the site serves an important purpose in terms of its role as Green Belt. In particular, this site plays a key part in preventing the merging of the settlements of Little Bookham and Effingham (NPPF, Paragraph 143 criterion b). Policy DS8 is in Annex 2 below.

Over recent years, and especially with the grant of planning permission on appeal in 2016, for the redevelopment of the Howard of Effingham School site for residential, and the re-provision of the Howard School on land at Effingham Lodge Farm, to the east of Preston Farm, on Lower Road, the settlements have become increasingly merged. The landscape buffer between the two at the point of Lower Road is now minimal and would be further degraded through the allocation and future development of the Land to the northwest of Preston Farm.

The town of Leatherhead has over time become completely merged with Fetcham, Great Bookham, and Little Bookham, creating a linear settlement pattern with limited definition between the villages along the A246 Guildford Road. The loss of the Green Belt between Little Bookham and Effingham, and thus between Guildford and Mole Valley, will further subsume Effingham into this ribbon development. In this respect, it is also very reasonable to argue that the Green Belt also serves the valid purpose of checking the unrestricted sprawl of the large built-up area of Leatherhead (NPPF, Paragraph 143 criterion a.).



Even if Inspector Barrett agrees there are Exceptional Circumstances and the allocation of DS8 proceeds once the plan is adopted, Policy EN1 would still apply to any land remaining in the Green Belt in accordance with the policies map. In particular with regards to Paragraph 3 (d), which lists appropriate buildings or facilities; this does not include housing, community buildings or gypsy and travellers' pitches.

Furthermore, this would mean that the gypsy and traveller sites, community centre and certain dwellings should be relocated from the Green Belt.

4 SHELAA

4.1 General

The Strategic Housing and Economic Land Availability Assessment ('SHELAA') of 2020 is referenced on page 14 of the Final Planning Statement, with it being noted under the Exceptional Circumstances assessment 18-BK-008 – Land northwest of Preston Farm, Bookham:

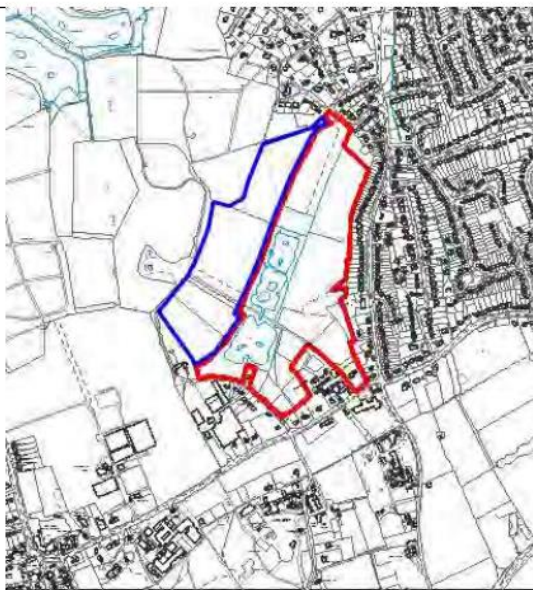
- The Council's policy was to eliminate any site with a Broad Area which scored "Significant" for the purposes of sprawl, merging or encroachment.
- Preston Farm straddles two broad areas – "BA" and "BB".
- We understand Area BA covers the Land northwest of Preston Farm which scored moderate for sprawl and encroachment and minimal for merging.

- Area BB scored moderate for sprawl, significant for merging and minimal for encroachment.

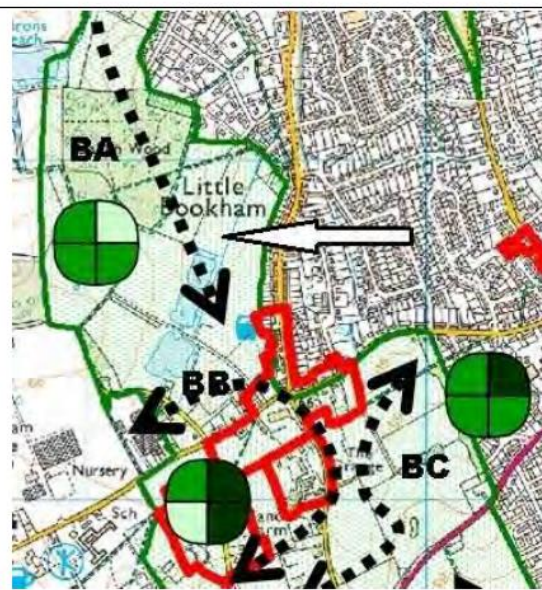
Refer to the extracted plan below from the assessment of 2020.

Exceptional Circumstances assessment: 18-BK-008 – Land North West of Preston Farm, Bookham, KT23 4EF

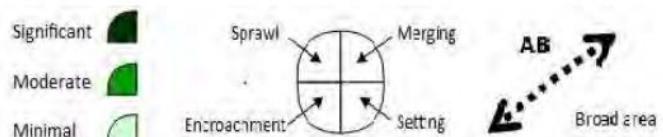
Site boundary (blue line denotes proposed country park)



Extract from Green Belt Review map



Total site area (ha)	27.4
Developable site area (ha)	10.0 approx
Potential yield	200



4.2 Area BA

The SHELAA Part 1.c states:

Planning permission has been granted for a new secondary school and 295 dwellings on land to the west, within GBC. The implications of this permission particularly in relation to merging between Bookham and Effingham have been considered and do not affect the scoring in the 2020 GBR. The land immediately west of area BA would include playing fields and outdoor sports facilities for the proposed school, which have a degree of openness and are not considered incompatible with the moderate score for merging in this location.

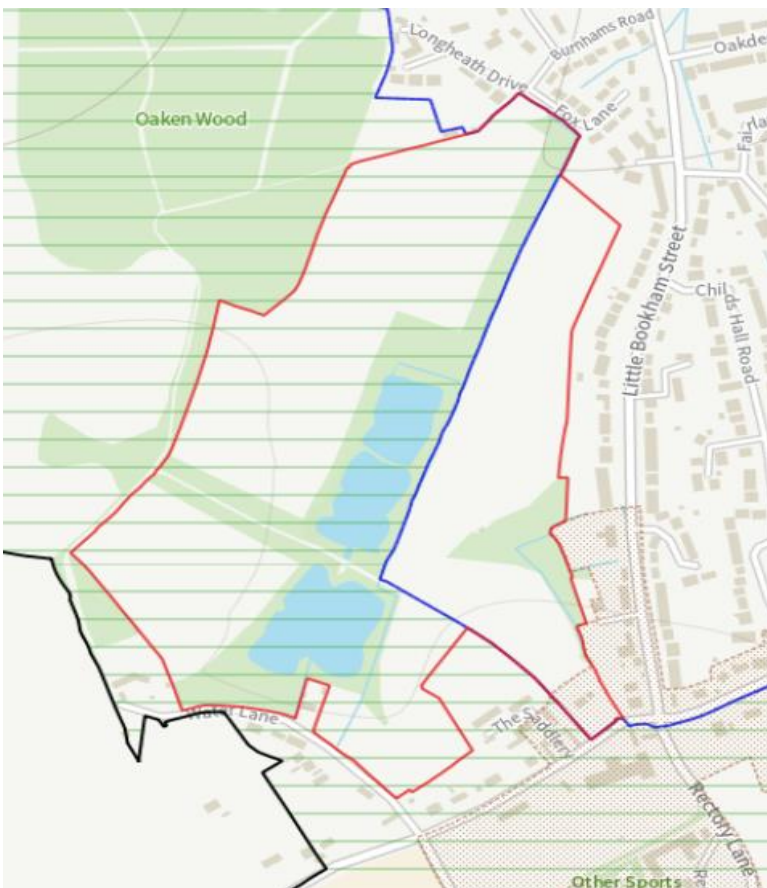
The SHELAA informs us that a major factor in the assessment of merging is the land immediately west of Area BA which includes the proposed Howard of Effingham school site. It was pointed out during the Local Plan Matter 10 Hearing of 25/10/22 that the additional 110 houses at Effingham Lodge Farm, which have since been granted planning permission by the Planning Inspectorate, would increase merging between Little Bookham and Effingham. Inspector Barrett was informed that if these had been included, the Area BA may have scored significant in terms of merging and been eliminated from the Local Plan.

4.3 Area BB

The significant score already allocated should have resulted in the Area BB being eliminated but, unlike a nearby site, it was not eliminated, and neither was Preston Farm. The BRA disagrees with this decision as the Area BB performs *significantly* in terms of merging.

Instead of eliminating during the sift between Regulations 18 to 19 the Area BB to the south-west of Preston Farm, which has a boundary with Water Lane and runs to the north of The Saddlery, the Council has confirmed that this area of approximately 2ha will remain in the Green Belt. The Green Belt will also wash over The Saddlery, which was a brownfield site situated on Preston Farm and developed by Thakeham Homes in 2019/20. There are no permitted development rights at The Saddlery to protect the Green Belt.

These changes were confirmed in the Policies Map at Regulation 19 (see below). Local councillors (at the time), namely Councillor Adams and Councillor Goodacre, confirmed in writing that the Council had no intention of building on Area BB and referred members of the public to the Policies Map. This was to confirm the new boundary running down the farm lane/track and separating The Saddlery from the 7.46ha of land proposed for development.



The Council's decision not to remove Area BB area during the 'sift' before Reg. 19 has caused significant confusion and should not, in our opinion, have been considered part of the development area. As a result, Thakeham Homes has continued to exploit the situation by putting the Council under additional pressure to release this land for development, as they are doing in this planning application. However, In February 2022, Council Officers confirmed there was no confusion (see 2nd February 2022 in 4.5) email from Piers Mason) and that the

development area in Policy DS8 was 10 ha. However, within the 10 ha only 2 ha could only be used for flood mitigation measures and not buildings. And 7.46 ha could be used for buildings including houses.

The Planning Policy Manager Duncan Clarke clarified the exact position during Matter 10: Issue 4 on the 25th October 2022.

7.4 ha – housing, community building and gypsy and travellers' sites.

2.3 ha – the Area BB remaining in the Green Belt.

2.4 ha – Sustainable Urban Drainage.

5.4 ha – Ponds

10.1 ha – Suitable Alternative Natural Green Space (SANG)

In respect of maintaining the Green Belt, the NPPF (Para 145) states:

Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period.

MVDC has been through this very lengthy process to establish its strategic policies, which are currently subject to Public Examination.

Thakeham Homes has also fully acknowledged in para 5.46 on page 35 of its Planning Statement of January 2024:

Green Belt Review area 'BB' includes a small portion of the southern part of the site. This area performs significantly in terms of merging. Consequently, the council have confirmed on that they are not proposing any development on the "BB" area as it would lead to merging, a loss of openness and harm to the Green Belt in this location.

However, the outline planning application under discussion is submitted with all matters reserved except for means of access, one of which is in the Area BB, namely access to the gypsy and traveller pitches on (up to) 0.2ha of land remaining in the Green Belt off Water Lane. Thakeham Homes also plan to build the community building, car park and some residential dwellings in this area north of The Saddlery; this evidences that Thakeham Homes is continuing to challenge the protection of the Green Belt and its boundaries.

This matter was discussed at great length with Inspector Barrett during the Local Plan examination Matter 10, Issue 4. She has not agreed a Main Modification to release this land. The NPPF paragraphs 142-156 aim to protect Green Belt land.

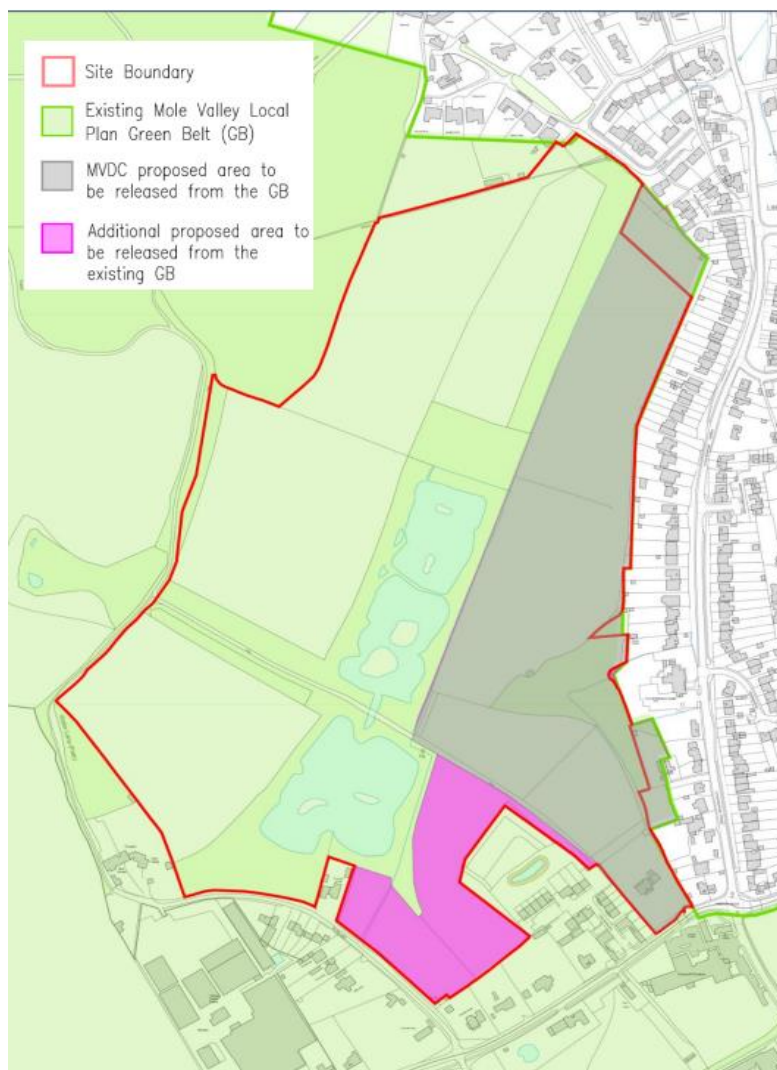
The BRA asks the council to ensure that Area BB is protected from further encroachment (NPPF para. 143c) and that no 'inappropriate development' is allowed in this area.

4.4 Public Hearings/ Stage 3/ Matter 10/ Issue 4: Bookham/Gypsy & Traveller Provision

Thakeham Homes R510 Hearing Statement of September 2022 on 2.6 Exceptional Circumstances for Green Belt Release suggested that, on a correct assessment of the Green Belt characteristics of the area around the Site, a further 2-hectare area (below) performs weakly in relation to Green Belt. It argued that, therefore, there are Exceptional Circumstances for amendment of the Green Belt boundary in this location.

In paragraph 2.30 from the Hearing Statement, Thakeham Homes has admitted that the development can be completed without encroaching into the area shown in purple below which remains within the Green Belt. It stated:

For the avoidance of doubt, should the extent of Green Belt release not be increased, Thakeham can deliver all requirements under DS8 including 200 dwellings, community building and Gypsy and Traveller provision. However, our proposed modifications are necessary to ensure soundness, providing the best layout for 200 new homes with capacity for modest increase, optimum locations for Gypsy and Traveller provision, community facility and open space.



Pursuant to this, Mr Burcher, Counsel for Thakeham, requested a Main Modification during the hearing but clearly the Inspector disagreed as there is no Main Modification in ED74 of 29/2/24, which has now gone out to public consultation. The BRA agrees with the Inspector that it was not necessary as detailed below:

Inspector MIQ: 6:

How would the requirement for Gypsy and Traveller pitches be accommodated within the site, including access, and would this be realistic?

Council's response MVDC Hearing Statement 8.6.1 of 8/9/22:

As shown within document B19j, representation Appendix 71B(Page33), the illustrative master plan submitted by the site promoter shows the Gypsy and Traveller pitches to be accommodated within the south-western part of the site with access off Water Lane. The Council welcomes the inclusion of the pitches within the promoted scheme. However, this element of the scheme will need to be considered further at the planning application stage as this is the area that the Council would like to see undeveloped.

R510 Thakeham Homes Matter 10 Bookham Hearing Statement 2.31 of September 2022:

It is important to enable the right location for Gypsy and Traveller provision within the Site. Whilst the pitches are deliverable within the existing boundary, the modest increase in Green Belt release proposed above would allow more sustainable delivery of the pitches, with their own vehicular access to the south. The two alternative approaches are shown below.

Figure 2.9: Gypsy and Traveller location under Submission Draft approach (L) and Thakeham proposal (R)



4.5 Council's Response of February 2022

This issue had been raised previously in February 2022 with the Deputy Chief Executive, Piers Mason, which resulted in the following response from him on 2/2/22:

"It is best that I start by saying that I do not agree that the Council has misled anybody as to the size of the developable area on proposed allocation DS8. I am of the view that accurate information is in the public domain. The total site area, shown edged red on the plan accompanying DS8 is approximately 27.4 Ha. The area that the allocation says is developable is approximately 10 Ha. The amount of land that is proposed to be removed from the Green Belt by adjusting the boundary is approximately 7 Ha. The difference between the 10 Ha and the 7 Ha is to account for land in the green belt being available for sustainable drainage measure to support the development. That area will therefore have development works on it but it will remain in the green belt and will not be developed with housing or any other buildings.

To be clear that is the Council's position. It is also the Council's position that the part of the site that would not be in the Green Belt is capable of delivering 200 houses.

To reiterate, our position is that the proposed Green Belt removal amounts to about 7 Ha and that is sufficient for the supply yield we have identified."

From the evidence provided, the Council clearly agrees with the BRA that any attempts to seize additional land for development which is in conflict of Policy EN1 must be dismissed and any development in the area remaining in the Green Belt would be inappropriate and harmful to the Green Belt

The BRA believes that there are no very special circumstances. As noted in Section 4.4, Thakeham Homes has previously confirmed during the Local Plan Examination they could deliver the gypsy and traveller pitches, the community building, and the full housing allocation in the 7.46 ha. This accords with the views of the Deputy Chief Executive, Piers Mason.

Furthermore, this planning application is in contravention of National Policy.

'Planning policy for traveller sites' (December 2023) Policy E:

16. Inappropriate development is harmful to the Green Belt and should not be approved in, except in very special circumstances. Traveller sites (temporary or permanent) in the Green Belt are inappropriate development. Subject to the best interests of child, personal circumstances and unmet need are unlikely to clearly outweigh harm to the Green Belt and any other harm so as to establish very special circumstances.

17. Green Belt boundaries should be altered only in exceptional circumstances. If a local planning authority wishes to make an exceptional, limited alteration to the defined Green Belt boundary (which might be to accommodate a site inset within the Green Belt) to meet a specific, identified need for a traveller site, it should do so only through the plan making process and not in response to a planning application. If land is removed from the Green Belt in this way, it should be specifically allocated in the development plan as a traveller site only.

We have previously said that we assume considerable weight will be given to the eMVLP when examining this planning application. Policy H5 Gypsies, travellers and travelling show people accommodation, clearly states in Part 6:

The development of new Gypsy and Traveller sites in the Green Belt is inappropriate development and will not be approved except in very special circumstances.

The BRA concludes that the proposed development of Gypsy and Traveller sites in the Green Belt is inappropriate development as the Council have stated they have no intention to remove the 2 ha of land from the Green Belt.

5 The Compendium of Minor Green Belt Boundaries

5.1 General

We address below Updates & Alterations (MVDC 2022) (H16) & Preston Farm DS8 which affect 51 individual properties in Little Bookham. Following the completion of the hearing sessions, Inspector Barrett requested a further consultation to the Inspector's Consultation ED50; the results of which will not be known until the Inspector issues her final report.

The NPPF at Paragraph 145 clearly states that once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified.

5.2 Proposed Changes

The Council has identified that in moving the boundaries, this could hypothetically result in development potential. The references are:

BK03 Long Heath Cottage, Longheath Drive (page 79 ED50)

The land appears to run behind 3 properties in Longheath Drive and not just Long Heath Cottage as stated. The area could clearly accommodate at least one large, detached house or several smaller properties.

BK09 2 Fox Lane, 3, 4 and 5 Heatherside Close, 85 – 97 Little Bookham Street (page 85 ED50)

The land affected as a consequence of the proposed changes is of significant size and could accommodate several properties. The council have stated that this land is adjacent to 11 properties, but the plan does not indicate where the garden boundaries are for all of the properties on the plan.

BK11 7, 9, 11, 15, 19 and 21 Little Bookham Street (page 91 ED50)

The land affected as a consequence of BK11 is of significant size and could accommodate several properties. The Green Belt boundary runs through the gardens and through the property at number 11. This property has been built behind the building line in the Green Belt. Therefore, as the land is of significant size, there would presumably be no objection to building properties behind the other properties which will be affected by this decision. These properties are all in the Conservation Area and some of them, including the Olde Windsor Castle, are listed buildings.

BK08 1, 2, 3, & 5 Fox Lane opposite 17 Burnham's Road (page 82 ED50)

BK10 Nos 33 – 85 Little Bookham Street (page 88 ED50)

It is unlikely that BK08 and BK10 will result in hypothetical land for development but, nonetheless, the owners of these properties should be consulted before any changes are made to boundaries that run through their gardens. One owner in Little Bookham Street does not own the land at the bottom of his garden, he leases it from the owner of Preston Farm. There

could be others in a similar situation and, therefore, the exact implications of all the boundary changes are unknown.

5.3 BRA Concerns

The BRA has a number of concerns with the proposed changes:

- At the Stage 2 Matter 3 Hearing, the Inspector asked Mr Clarke what criteria were used to decide on the broad areas for development and one was that the sites had to be surrounded by roads. However, the development Area BA at Preston Farm is not surrounded by roads as evidenced in these proposed boundary changes. The only part which adjacent to a road is at 330 Lower Road.
- The data in ED50 confirms that 51 properties in Little Bookham will have Green Belt boundaries removed/changed, many of which run through their gardens. This would happen without their consent and possibly without their knowledge. People purchased their properties in the knowledge that the NPPF protected the Green Belt which meant their gardens would be safe and that neighbours could not build behind their properties.
- The Compendium of Minor Green Belt Updates was filed in the Examination Library in February 2022 as a consequence of gaps in the information. So, there has been no opportunity to inform the public during Regulation 18 or Regulation 19.
- Also of concern is that the Inspector's current request for responses is only from representors. There has been little time for research into the potential risks. For example, how will the proposals impact on priority habitats and the spring which runs along the edge of the field if homeowners start felling trees or clearing land for housing development?
- The Inspector asked if the council's criterion was robust enough to protect the public. Surely homeowners will be wondering what grounds the Council will have for dismissing planning applications if they are consenting to 200 houses being built on adjacent land which is also currently in the Green Belt.

The BRA concludes these are further reasons for the Council to defer their decision.

6 Green Belt Boundaries

6.1 NPPF Para. 148

The NPPF states in para. 148 that, when defining Green Belt boundaries, plans should:

- Ensure consistency with the development plan's strategy for meeting identified requirements for sustainable development;*
- Not include land which it is unnecessary to keep permanently open;*
- Where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;*

- (d) *Make clear that safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development;*
- (e) *Be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and*
- (f) *Define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.*

The existing boundary at Preston Farm is clearly defined by The Saddlery, the rear gardens of houses in Little Bookham Street and areas of mature woodland (consistent with para 148(f) of the NPPF). They provide a permanent and defensible boundary. The new boundary follows a line close to the ponds' edges and not the ponds themselves, a thin row of trees and a drainage channel and a track. These lack any defined physical features.

The BRA's concern is that that the Council's analysis relies on its ability to protect the Area BB (deemed *Significant* for merging) by limiting the extent of the built development in this area. However:

- This would rely on a defensible GB boundary, which cannot be delivered in this location as there are no defined physical features to promote this;
- And secondly, on the face of it there is already pressure from the developer to locate residential dwellings and a community building in this area as evidenced in the Masterplan.

This gives the BRA little confidence that adequate effort will be made to ensure that NPPF para. 148 is complied with.

There is currently an old farm track which is still in use which separates the 2ha of land remaining in the Green Belt and the 7.46ha proposed for development. This is acknowledged in the SHELAA Part 2: (e) as the dividing point of the two areas and the line which requires a permanent and physical boundary on the ground.

The avenue of Horse Chestnut trees, which are a prominent feature of this boundary, are being proposed for removal to make way for the new access road to the site. However, they do not form a physical boundary on the ground and would need to be supplemented with additional planting or some form of fencing to comply with NPPF para. 148 (f):

When defining Green Belt boundaries, plans should: define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.

The SHELAA Part 1 (c) states that "*subject to excluding built development within the broad area BB it is not considered that this loss of openness would have wider implications for the function of the Green Belt in this location.*"

This is not strictly true and has not been properly considered. The areas affected in this location are Water Lane, the bridleway leading from Water Lane and The Saddlery. The SHELAA was written in 2020 and The Saddlery wasn't completed until later that year. It goes without saying that the openness of the Green Belt will be harmed by development because the public currently enjoy fully open views from Water Lane which may be considered 'filtered views' but there will still be an impact. The deciduous hedge which borders the Water Lane boundary with Preston Farm is very patchy and if any more trees are felled, there will be open views across the fields.

The houses at The Saddlery stand out very prominently looking south-east from the bridleway. The lack of the permanent physical boundary will mean loss of amenity to residents and the public in Water Lane. The same could be said for residents living at The Saddlery. The openness of the Green Belt will be replaced by a building site initially and, on completion, modern houses.

6.2 Site Constraints in the Design & Access Statement (Figure 14)

The methodology to assess the openness of the Green Belt and visually sensitive areas appears to be inconsistent in its approach and confusing. If this is purely down to personal opinion and surely it must be, we do not agree with it and suggest another appraisal should be undertaken to fully reflect the loss of amenity to both residents and the public.

- The rear of gardens in Little Bookham Street have “filtered views” and this is a visually sensitive edge. We agree this is an extremely visually sensitive edge and a loss of amenity to residents.
- There is no assessment for The Saddlery which is referred to as The Martingales and shows the old farm buildings. Firstly, this is out of date and secondly, the views from The Saddlery would be “direct views” because there is no screening to the rear of the properties and minimal screening looking towards the Area BA. A number of trees were planted by Thakeham Homes but half of them died, possibly due to the waterlogged soil and climate change. There are a group of trees on the eastern boundary of The Saddlery which are diseased so no doubt their future is uncertain. The Saddlery is extremely exposed to the development in the Area BA and in our opinion should have been assessed as a visually sensitive edge.
- Why has the rear of gardens on Lower Road not had their views assessed but been rated a visually sensitive edge. This appears to be at odds with The Saddlery assessment.
- From Water Lane the views are filtered but are not visually sensitive. If Lower Road is a visually sensitive edge, why isn't Water Lane? If development proceeds in the Area BA, Water Lane will have direct views towards the development.

6.3 The Landscape & Visual Appraisal January 2024

To emphasise the point, the viewpoint appraisal at the end of this document on page 90 indicates that the proposed 2-3 storey buildings on the development will be theoretically visible from as far away as Thornet Wood in Effingham and The Grange in Rectory Lane.

There is no doubt to us that the visual impact of the development on Little Bookham Street and The Saddlery will be severe. They are extremely exposed.

Water Lane currently has some screening albeit patchy in places and deciduous woodland, so the impact would be moderate to severe depending on the seasons.

From the public bridleway, Lower Road and Liberham Lodge also on Lower Road, the impact will be minimal to moderate.



6.4 Key Requirements

The BRA believes that key requirements to be adopted to satisfy NPPF para. 148 are:

- If the development proceeds, Thakeham Homes should provide a new physical boundary which will form a permanent demarcation between the Areas BA and BB. NPPF 148 (f). This is vital to identify the land remaining in the Green Belt. The boundary will also protect Area BB from incursion once the development is completed.
- A more thorough appraisal of the visually sensitive edges is recommended to ensure fair treatment to all residents living around Preston Farm and the public views.
- Any significant impacts must be mitigated with mature planting which will be watered and maintained for a period of 5 years.

Annex 1 – POLICY EN1: THE GREEN BELT

1. Land which is designated as Metropolitan Green Belt will be protected against inappropriate development, as defined by national policy.
2. Inappropriate development will not be permitted in the Green Belt, unless very special circumstances are demonstrated which are concluded to outweigh the potential harm, including harm to the openness of the Green Belt and the purposes of including land within it.
3. The following forms of development are exceptions to the definition of inappropriate development and will be permitted where they comply with other relevant policies in this Plan:
 - a. Extension or alteration of an existing dwelling or other building, including provision of ancillary buildings within the curtilage of an existing dwelling or other building, provided the proposed development does not result in disproportionate additions over and above the size of the original building;
 - b. Replacement of an existing dwelling or other building, provided the new building is in the same use and not materially larger than the one it replaces;
 - c. Buildings or other structures which it has been demonstrated are reasonably necessary to support agricultural, horticultural or forestry use of the site, in accordance with Policy EC6;
 - d. Appropriate buildings or facilities for outdoor sport, outdoor recreation, cemeteries, burial grounds and allotments, provided the proposed buildings and associated uses or activity would preserve the openness of the Green Belt and not conflict with the purposes of including land within it, by reason of their scale, design or siting. Where external lighting is proposed, or likely to be required, in connection with proposed outdoor uses, this should not result in light pollution adversely impacting on the amenities of neighbouring properties or the surrounding landscape, taking account of existing levels of artificial illumination in the surrounding area;
 - e. The re-use of existing buildings which are of permanent and substantial construction, provided the physical changes and associated uses and activity would preserve the openness of the Green Belt and not conflict with the purposes of including land within it.
 - f. Limited infilling in villages, in accordance with Policy EN3;
 - g. Limited infilling or redevelopment of previously developed land where the new development would not have a greater impact on the openness of the Green Belt than the existing development;
 - h. Reuse of previously developed land to meet an identified affordable housing need within Mole Valley, where the development would not cause substantial harm to the openness of the Green Belt;
 - i. Limited affordable housing for local community needs, in accordance with Policy H4 or,
 - j. Other forms of development specifically identified through national policy as exceptions to the definition of inappropriate development, including changes of use and engineering operations which preserve the openness of the Green Belt and do not conflict with the purposes of including land within it.

Annex 2 – POLICY DS8 - LAND NORTHWEST of PRESTON FARM, BOOKHAM

*Allocated for: Residential, Community (including early years education) and Country Park
Site area (ha): 27.4 ha total, approx. 10ha developable*

Indicative capacity: 200 dwellings, at least 3 gypsy and traveller pitches

*Policy Map Designations: Former Green Belt (part), Green belt (part), Built up area (part),
Conservation area (part), Area of Critical Drainage, Part within 5km, rest within 7km of
Thames Basin Heaths Special Protection Area.*

Relevant Planning History: None

In addition to meeting the policies in the plan, any developer of this site will be required to:

- 1. Locate built development within the eastern part of the site, which is excluded from the Green Belt, as shown on the Policies Map.*
- 2. Create clearly defined boundaries between the edge of the residential development and the Green Belt using physical features which are recognisable, likely to be permanent and consistent with the character of the surrounding environment.*
- 3. Conserve and where possible enhance the setting of heritage assets including Little Bookham Conservation Area and nearby listed buildings.*
- 4. Retain the existing ponds and incorporate them into proposals for management and enhancement of biodiversity on site.*
- 5. Maximise retention and safeguarding of existing mature trees and hedgerows, including areas identified as Priority Habitat (deciduous woodland), and incorporate them into a well-integrated landscape strategy.*
- 6. Create a Country Park within the land lying to the west of the ponds, providing at least 10.3ha of Suitable Alternative Natural Greenspace (SANG), incorporating walking routes, public car parking and measures for biodiversity enhancement, designed and implemented in accordance with Natural England guidelines.*
- 7. Establish a legal mechanism for long term management of the Country Park, supporting both public access and an appropriate habitat management regime.*
- 8. Incorporate any mitigation measures that may be required to address any adverse effects on the integrity of the Thames Basin Heaths Special Protection Area.*
- 9. Incorporate sustainable drainage measures to mitigate the risk of surface water flooding in accordance with Policy INF3 and site-specific guidance in the Level 2 Strategic Flood Risk Assessment.*
- 10. Incorporate an area of approx. 0.2ha, with access to the highway and utilities connections, suitable for delivery of gypsy and traveller pitches in accordance with policy H5.*
- 11. Provide a community building of at least 2000sqm, capable of accommodating early years education provision and other community uses responding to the needs of the locality.*
- 12. In addition to the country park, provide publicly accessible open space and equipped play space in accordance with the standards in Policy EN10.*
- 13. Provide suitable and safe vehicular access from Lower Road.*
- 14. Demonstrate through traffic modelling that the proposed development would not have any significant impact on the transport network in terms of capacity or congestion, both individually and cumulatively with other nearby developments, or that any such impact can be mitigated to an acceptable degree.*
- 15. Liaise with the relevant service provider to ensure the occupation of the development is phased to align with the delivery of necessary sewerage infrastructure.*
- 16. Provide water efficiency measures such as water butts, rainwater harvesting, water-saving appliances and fittings, with the aim of exceeding the requirements of policy H10, to reduce increased pressure on water supply infrastructure.*



- 17. Any developer of this site should, where possible:*
- 18. Establish walking and cycling routes through the site, connected to surrounding roads and rights of way, at locations which support active travel to work, school and local services.*
- 19. Incorporate measures to enhance pedestrian and cyclist safety along Lower Road, in order to facilitate safe sustainable travel to local shops, schools and other services.*
- 20. Incorporate measures for flood risk betterment, aimed at reducing the surface water flow path through and beyond the site.*

APPENDIX 3 – TREES, HERITAGE ASSESSMENTS & ECOLOGY

1. Tree Matters

Whilst this is only an Outline Application, we feel it would be beneficial to make some general comments at this stage.

1. We would strongly recommend a proactive approach and that MVDC issue an area TPO for the entire site to prevent any pre-emptive tree works.

With the exception of a small area of the site, which is in a Conservation area, where these trees have a nominal amount of protection, there is no protection at all for all the remaining trees.

This site contains, in addition to other species, approximately 20 class A and 65 class B English Oaks (*Q. robur*) which need to be protected. There is a possibility some of these Oaks could be classified as either “Veteran” or “Ancient”.

A repeat of events at the former Aviva Insurance site on Pixham Lane in Dorking needs to be avoided. Nobody wants a distressed phone call on a Sunday morning.

2. The Tree Survey is incomplete. It is missing a vital document namely the plan showing the location of each tree / group of trees.

This document is essential to enable a full understanding of where all the trees are located and their positions relative to the proposed new building works.

3. For the proposed access point to be viable a mature Lime street tree (under SCC responsibility) would need to be removed.

We strongly object to a mature and healthy tree being needlessly sacrificed.

4. The MVDC Tree Officer needs to verify that all trees that are stated in the Tree Schedule to be diseased / dead / a danger to the public are correct.

It is perhaps convenient that the avenue of Horse Chestnuts proposed to be removed are stated as being diseased.

5. All Ash trees need to be carefully assessed for Dieback. It should not be assumed that all Ash trees are going to die from Dieback. Recent findings in the Bookhams areas are indicating that some Ash trees, especially mature trees, are recovering from dieback and acquiring natural immunity.

6. Green architecture

Although this is an outline application, consideration of green architecture could be put in place at this stage to prevent the use of wooden board fencing to divide new properties in this development. In order to maintain the “countryside” feel of the locality, replacing board

fencing between properties with wire fencing and hedgerows (preferably of native species) will go a long way towards mitigating the introduced hard landscape.

2. Archaeological Desk Based Assessment

We feel that this desk-based assessment does not give full detail of local discoveries.

The Archaeological Desk Based Assessment (024.01.17__7506C_Preston_Farm_ADBA_FINAL_v2_reduced.pdf) Section 4.2.4 records Roman finds as:

- A Roman coin of Tiberius (116) was encountered c.755m south of the Site.
- A Roman brooch (2982) on Rectory Lane c.425m south-east of the Site
- 2 references to a Roman ditch (MSE24336) west of Browns Lane c.865m south-west of the Site.

Section 4.2.7 describing Iron Age records states:

“No Iron Age archaeological records are present within the Site or Study Area.”

Whilst this information has been taken from the SHER Surrey Historic Environment Record, we are aware that the information given is incomplete and out of date in that there have been numerous Roman coins and a number of Roman brooches found within 1km of the study site. In addition, there have been both late Iron Age coins and a brooch found within 1km of the study site.

This information is available from the Portable Antiquities Scheme database finds.org.uk. A database affiliated to the British Museum.

Furthermore, both Roman and Saxon ditches were recently excavated east of Church Street in Effingham, within the 1km study site area.

We strongly endorse SCC Archaeological Dept conclusion that:

“No development shall take place until the applicant, or their agents or successors in title, has secured the implementation of a programme of archaeological work, to be conducted in accordance with a written scheme of investigation which has been submitted to and approved, in writing, by the Local Planning Authority.”

Recent finds from an area less than a mile from this site have uncovered a significant number of artefacts from the late Iron Age and Roman periods.

It is highly likely this site is also rich in artefacts from the same period.

3 Ecology

The BRA has concerns also over the impact of the development on the ecology, which warrant further investigations.

APPENDIX 4 – FLOOD RISK & WASTEWATER ASSESSMENTS

1 Comments on Flood Risk Assessment

1.1 General

These comments relate to Cannon document CCE/L271/FRA2-04 dated January 2024. We note that SCC have advised (8 March 2024) that they are currently satisfied with proposed drainage scheme but advise appropriate conditions be added to any planning permission.

BRA and the Bookham Flood Forum have for a number of years monitored problems with both surface water flooding and foul and surface water sewers throughout the villages of Great and Little Bookham. To this end, they are very aware of the problems associated with Preston Farm and the area 'downstream' of the site, which is not always evident from a desk-based analysis.

In relation to this Outline Application, BRA request that Thakeham Homes provide:

- The drainage strategy for the new Country Park / SANG.
- Details of measures being put in place to manage the flooding to the rear of properties in Little Bookham Street.
- Details of how existing drainage for The Saddlery will be included in the overall drainage strategy for the site.
- Details of surface water drainage from the Gypsy and Traveller pitches.
 - Assurances that the proposed compensatory flood plain will not cause any flooding towards Water Lane.
- Measures to be put in place to ensure pedestrian and cycle routes will be passable year round and not routinely flooded.
- Commitment to enter into a legal agreement with National Trust regarding maintenance of their Little Bookham Street ditches.
- Clarity over proposed on-site surface water drain infrastructure maintenance and who will pay for it.

Further detailed comments follow:

1.2 Environment Agency mapping and sources of incoming and outflowing flooding

Environment Agency mapping clearly shows the areas of surface water flooding running down the middle of the site adjacent to the ponds. Ponding on the grassland across the site may be seen in periods of heavy rainfall. The public footpath network (FP76/FP84) adjacent to the proposed Country Park / SANG is similarly often flooded.

Thakeham Homes have proposed, in section 2.5 of the FRA, siting the Gypsy and Traveller pitches off Water Lane in such a potentially wet area that they are proposing to raise it by

600 mm. In section 2.6 they mention a compensatory flood plain to the south-east in the same rough area as the shallow basin mentioned in d. below.

Assurances are requested that this will not cause any flooding towards Water Lane.

1.2.1 Sources of water coming onto Preston Farm

As evidenced by the EA map, surface water drains towards the site from a number of sources, most of these stemming from the spring line which runs South of Lower Road all the way from Effingham to Bookham, during high rainfall events. The following is observed and documented by photographic and video evidence.

- i. **From the west** from Effingham Lodge Farm – a fast flowing stream runs along FP76 to the west of The Vineries, crosses Water Lane to the east and then runs off towards Preston Farm.



Figure 1 - Water flooding off FP76 (top of picture) and across Water Lane to Preston Farm 2nd March 2024

- ii. **From the south-west**, from The Howard and Manor House schools, which flows across The Vineries and through some of the properties in Water Lane into the ditching system there and thence onto Preston Farm. The spring line is mentioned in section 2.8 of the FRA but it does not detail the onward flow onto Preston Farm.
- iii. **From the south**, along Manor House Lane and Water Lane, often flooding the single track road but then draining to a roadside ditch, under the lane, and into a ditch across Preston Farm.



*Figure 2 - Water flowing down Water Lane
2nd March 2024*



*Figure 3 - Water flowing off Water Lane
into ditch, under the road and across to
ditching on Preston Farm 2nd March 2024*

- iv. **From the south-east** originating in a field south of Lower Road and causing flooding to the footway, the road and through the garage of 340 Lower Road. This is described as highway drainage in section 1.8 of the FRA and a shallow basin is proposed to help treat any pollutants from this source. Clearly the highway is not the original source of this flow.

Additionally, **the EA map shows flooding to the east of the site**, close to Little Bookham Street, both in defined watercourses and also irregular areas of surface water to the rear of some of the properties. During high rainfall events, this drains off Preston Farm to the rear of some of the properties in Little Bookham Street causing significant flooding in rear gardens and surrounding the rear of the houses.



*Figure 4- Looking onto Preston Farm
from garden of house in Little Bookham
St. 2nd March 2024*



*Figure 5 - Flooding from rear garden
round to side of house in Little Bookham
St. 2nd March 2024*

Some of this then drains through to Little Bookham Street and north along the road there. One other input to the drainage infrastructure which needs to be taken into account is the **surface water drainage from The Saddlery** development. This currently flows into an attenuation pond before being released via piping straight down to the watercourses running along the line of ponds. This needs to be addressed in the overall drainage strategy for the site.

1.2.2 Current outflow

The surface water from Preston Farm drains into a ditch at Fox Lane and thence on to Little Bookham Street, where it crosses under the road and enters the open National Trust ditching northwards towards Bookham Common. The open ditching alongside vegetation is frequently blocked, causing further flooding.

At Fox Lane there are two outlets from the ditch:

- i. A 600 mm Thames Water surface water sewer at the corner in Fox Lane which is culverted under the road to the cul de sac end and thence into an open ditch out towards Little Bookham Street, as described above.
- ii. A twin bored culvert where FP84 leaves a heavily waterlogged area of Preston Farm land to go under Fox Lane and some of the houses directly opposite, before also going into open ditching and taking the route above. During high rainfall events this second outflow is typically badly overloaded, with the whole area of the site under water and the footpath passable only in boots.



Figure 6 - Flooding at Fox Lane near current bridge 3rd March 2024

1.3 Geology and infiltration

In sections 1.1.1 – 1.1.3 of the Flood Risk Assessment, the site soil is recognised as clay-based and infiltration rates are not surprisingly poor.

1.4 Public footpaths and site pedestrian and cycle routes

- i. As mentioned above, FP76 & FP84 are frequently flooded as is the area where FP84 and the Fox Lane pedestrian/cycle route leaves the site.
- ii. Similarly, there is a proposed pedestrian/cycle route leaving the site at Water Lane and this is crossing what has previously been described as compensatory flood plain and a treatment basin.

- iii. The Country Park / SANG has a network of paths and these will be across an area which may well flood as well.

There is no mention of how these paths and routes will be improved/ constructed to ensure they are usable year-round. In particular the proposed pedestrian/cycle route through the site has been included to keep people off the roads would be used by people in normal footwear, unlike the Country Park/SANG where people may be prepared to wear stouter footwear. Nonetheless if the latter surface is routinely flooded it will not be used and the Country Park will become an expensive-to-maintain red herring.

1.5 Proposed Drainage Strategy

This is summarised in section 2.3 and further detailed in section 3. Key to this is conveying water off the development parcel via an aqueduct and 3 earth bunds into an attenuation pond at the northern end of the site in the SANG area. Run off from the site into the watercourse within the site boundary will be appropriately controlled to the annual greenfield rate. These measures are intended to reduce off-site flooding.

The following information is missing from the strategy

- i. There is no mention of any drainage strategy for the **new Country Park / SANG**. This area is subject to flooding and as such could contribute to flooding downstream, not managed by the Proposed Drainage Strategy for the development parcel.
- ii. Nor is there any mention of any measures being put in place to manage the **flood- ing to the rear of properties in Little Bookham Street**.
- iii. Surface water drainage from **Gypsy and Traveller pitches** is similarly not defined.
- iv. Measures to be put in place to address the afore-mentioned issues with pedestrian and cycle routes.

a) Conveyance of outflow via National Trust ditches in Little Bookham Street

As indicated earlier, these ditches frequently block and BRA requested that the National Trust were consulted about this application. We would like to request that consideration given to a condition on this application covering off a legal agreement to ensure that these ditches are kept appropriately maintained to avoid potential problems arising from the development in periods of high rainfall.

b) Responsibility for ongoing maintenance of surface water drainage infrastructure

Clarity is required as to who will foot the bill for maintenance of all the drainage related infrastructure post site occupation; it is not considered acceptable for incoming residents to have a service charge for this.

In summary, BRA is requesting further information, as detailed above, to complete its review of the Flood Risk Assessment.

2 Comments on Wastewater Assessment

These comments relate to Cannon document CCE/L271/WA2-04 dated January 2024. We note that Thames Water have advised (1 March 2024) that they have '*no objections with regard to foul water sewerage network infrastructure capacity*'.

BRA and the Bookham Flood Forum have for a number of years monitored problems with both the foul water sewers and surface water flooding throughout the villages of Great and Little Bookham. To this end, they are very aware of the problems with the existing foul network due to the age of the infrastructure, specifically to Preston Farm.

In relation to this Outline Application, BRA request that Thakeham Homes

- **provide further detail about the proposals for the existing 150 mm foul sewer across Preston Farm, along with associated existing property connections.**
- **confirm how the proposed Gypsy and Traveller pitches will be connected to the foul water network.**
- **seek specific confirmation from Thames Water that the planned connection to Burnhams Road is to a modern, adequately sized PVC sewer.**
- **also, that the Little Bookham Street main sewer to the north of the Burnhams Road junction is in good condition and has adequate capacity.**

Further comments follow:

History of problems with current foul sewer across Preston Farm site.

Prior to Winter 2012/13, a 150mm diameter pitch fibre foul drain ran across Preston Farm from Water Lane to Little Bookham Street, entering the Little Bookham Street main around house no. 31. That winter there was a severe blockage of the line at the Water Lane end due to root ingress and eventually a relatively short section of the line was replaced by a 150 mm PVC pipe. There have been a number of further blockages over the years and last summer Thames Water made a total of 6 visits to clear further root ingress, which was causing an overflowing manhole and back-up at The Saddlery, a recent 25 home development to the south. We had always suggested that any development on Preston Farm would need a new and probably upsized foul sewer.

The **Wastewater Assessment proposes** in section 2.4:

- Upsizing and re-routing the existing 150mm pipe crossing the Site (to provide additional capacity and to divert existing flows further downstream to a less constrained part of the TW network).
- A point of connection to the existing network north of the Site within Burnhams Road;

Details of missing information where clarification is required.

The outline wastewater drainage strategy is given in Appendix C and shows the above proposals but omits to give any detail about what is happening to the existing sewer and the properties connected to it. Nor does it give any details of how the proposed Gypsy & Traveller pitches off Water Lane will be connected. These omitted details must be provided for a full evaluation to be made. BRA would request that, should the existing connections be retained, the 150 mm pipeline needs complete replacement by a PVC pipe to avoid further problems with root ingress.

We would welcome reassurance that the planned connection to Burnhams Road is to a modern, adequately sized PVC sewer without any potential for root ingress or other old pitch fibre line issues. Also that the Little Bookham Street main sewer to the north of the Burnhams Road junction is in good condition and has adequate capacity. It should be noted that there have previously been issues with the sewer further south in Little Bookham Street where the current pitch fibre sewer across Preston Farm drains to.

In summary, BRA is requesting further information, as detailed above, to complete its review of the Wastewater Strategy.

3 Chalk Streams

In May 2022, Natural England launched a national project to identify updates to the BAP chalk rivers map:

“The review process has extended the original map into the smaller stream network. Collectively these smaller chalk streams, including seasonally flowing ‘winterbournes’, are of great importance to biodiversity, and it is critical that they are properly recognised, protected and restored along with larger chalk streams and rivers. Efforts were made to make the published map as accurate as possible but further local refinement is known to be required since there is still considerable uncertainty within the smaller stream network.”

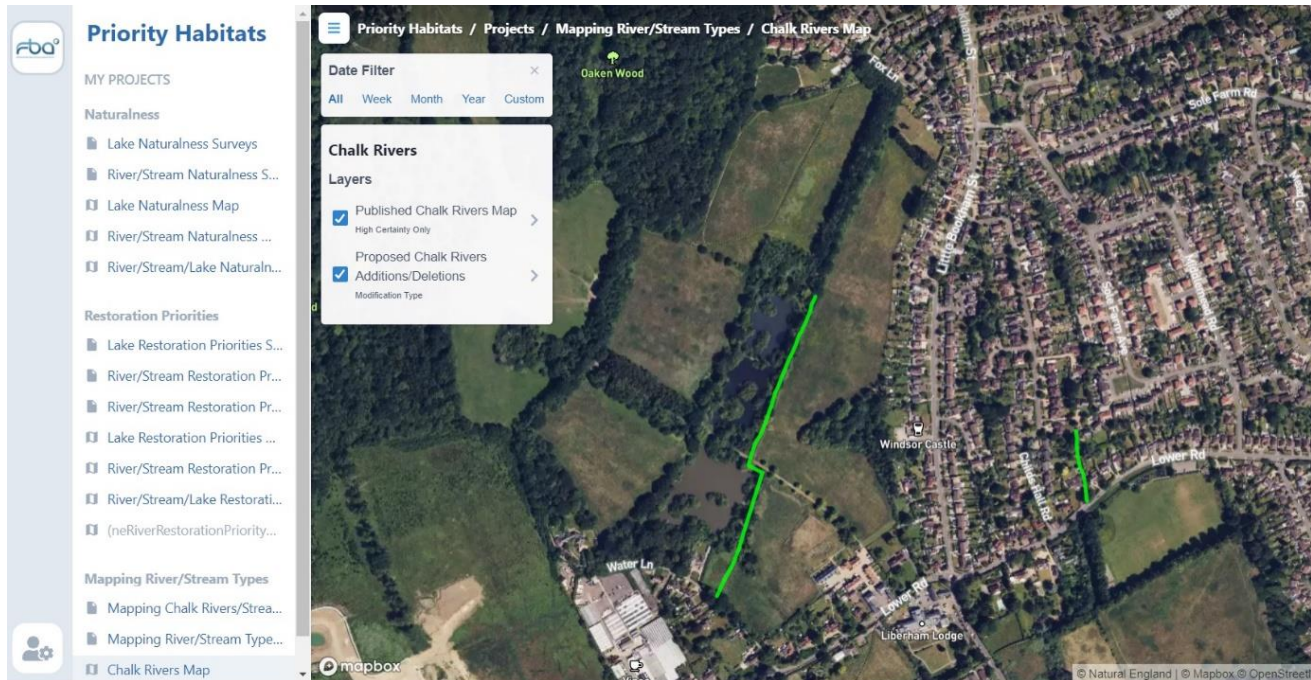
Further refinements to the BAP chalk rivers map are important for ensuring all chalk rivers receive sufficient attention within the broader context of priority river habitat objectives and the measures put in place to implement the Water Framework Directive. Since 2008 the UK BAP definition of priority river habitat has been much broader than chalk rivers, which has necessitated a shift in strategic focus towards protecting and restoring high levels of natural river and stream function across all river/stream types (further explanation of this is provided here on the Discovering priority habitats website). The important thing to remember is that all chalk rivers are a biodiversity priority for protection and restoration at one level, along with all other river types included in the UK BAP definition. The national map of chalk rivers allows strategic assessment and management of the chalk river resource, in terms of its condition and the levels of activity directed at its protection and restoration.”

The BRA has been liaising with Natural England, the South East Rivers Trust and other parties to evidence the natural spring line through the Bookham villages, including the chalk springs and streams in the vicinity of Preston Farm.

Following the submission of video and photographic evidence into Natural England, its freshwater specialists approved two additions to the UK’s Chalk River data set (i.e. permanent and winterbourne chalk streams) in August 2022 in Great and Little Bookham simply on the basis of the videos and evidence the BRA had uploaded. The assessment was:

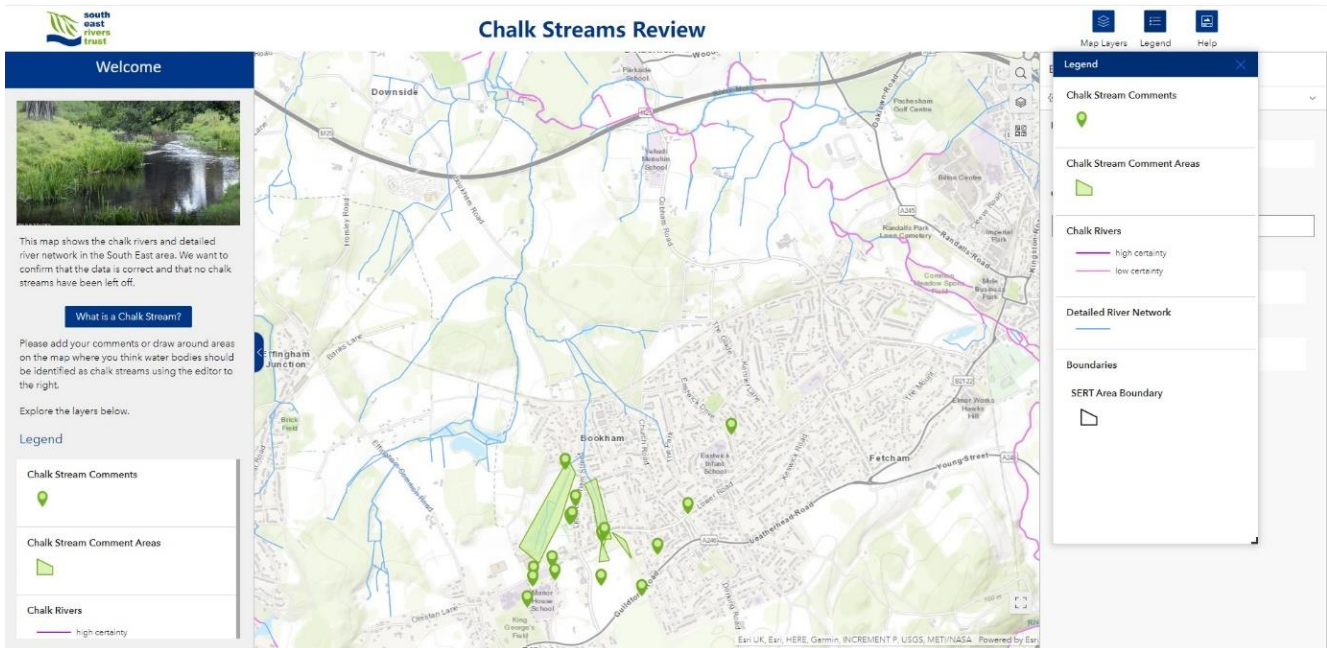
“the location relative to other headwater sections that are currently on the chalk rivers/streams map suggests it is likely there would be a natural winterbourne there. ... Irrespective of whether there is an identifiable winterbourne stream, naturally functioning spring zones and associated pools and flushes are an extremely important and greatly diminished habitat. It’s not clear how natural the vegetation is from your photos but it would appear that the spring

line is functioning naturally (in hydrological terms) and irrespective of the current state of vegetation there looks to be considerable restoration potential. This is the kind of area where Natural England is looking to restore more naturally functioning habitat mosaics (see Reports NERR064 and NERR071 and CaBA biodiversity guidance), even if this a small-scale example.”



Following the submission of video and photographic evidence into the South East Rivers Trust’s survey, a SERT team conducted an initial site survey in December 2022. This initial survey:

- Confirmed the proposed Chalk River additions;
- Identified some winterbourne headwaters in the areas to the south of the new Chalk Rivers including: one of the ancient chalk pits in Great Bookham, which fill directly from the aquifer when the water table is high; and a few more locations in which chalk springs have repeatedly emerged;
- Confirmed the need for further surveys along Mole Valley’s spring line to identify the full extent of this Priority Habitat and its associated irreplaceable habitat (lowland fens), including also tracing the route of each chalk stream tributary from the spring line through Bookham Common’s SSSI and into the River Mole.



During an examination of the draft Local Plan, the BRA provided evidence to Mole Valley in relation to the work being done to confirm priority & irreplaceable habitats in the catchment known as “Downside Ditches and Bookham Brook”, which takes in water from an area around 21.379 km² in size and is part of the Mole Lower and Rythe catchment area. It is 6.327 km long. According to the mapping data available from the Environment Agency, a network of streams flow to the north/northwest of the development site, stretching to the vicinity of Bookham Common, a SSSI.

Since the Examination, the Environment Agency in association with Cartographer Studios has rolled out training for the local planning officers and ecologists who are responsible for reviewing planning applications. https://www.local.gov.uk/pas/find-event/pas-past-events/water-course-metric-biodiversity-training-local-planners-ecologists?fbclid=IwAR0mhz9CFG6dspixvHXjfPKEYym2daHJW9lrJD_9XRK-hEY5WWq9QnhwZ9WY Once SERT’s extensive survey data has been transferred into Natural England’s tooling, a formal reissue of the BAP chalk rivers map will be made. However, local planning officers and ecologists are able to verify the presence of chalk stream additions running through Preston Farm and in close proximity to it, and can therefore confirm that they will be adversely affected by the proposed development.

In the interests of protecting Mole Valley’s Irreplaceable and Priority habitats along the North Downs Dip Slopes, our expectation is that a suitably qualified freshwater ecologist must be commissioned by the Council to provide an independent validation of the presence of chalk streams.