



The Head of Planning,  
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16<sup>th</sup> December 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**

Thank you for notifying me of the amended and additional information received by you in respect of this Application, which is summarised in the Design & Access Statement Addendum. We recognise that the main changes are: -

- The relocation of the Gypsy & Traveller Pitches and the Community Building and its car park.
- Updated access arrangements including the removal of vehicular access from Water Lane.
- The relocation of the Local Equipment Area of Play & the SANG car park.
- Reconfiguration of residential land parcels and updated building heights, as shown on the Amended Parameter Plans.

Apart from the Design & Access Statement Addendum we note that the new documents include: -

- An amended SANG circular route.
- An amended Illustrative Masterplan.
- A Heritage Impact Assessment.
- Some additional Ecology Information.
- A Chalk Streams Rebuttal.
- Plus, Addenda to the Landscape & Visual Assessment; the Green Belt Statement; the Planning Statement; the Arboricultural Impact Assessment; and the Flood Risk Assessment.

I have set out below our views in relation to the planning application following detailed consideration of the added documents and amendments to the proposed development. All policy references are to the Local Plan adopted in October 2024, unless otherwise noted.

## 1. Land use.

Our key concerns can be summarised as:

- The density of housing proposed for the developable area is approximately 28 per hectare based on the stated proposal for 200 dwellings, based upon the statement in Policy DS8 that

the developable area is 7.4 ha and deducting the 0.32 ha allocated to G&T and the Community building. This exceeds significantly the Council's policy with Indicative Residential Capacity under Chapter 9, Paragraph 9.5 on p.119, which is 20 per hectare for *Greenfield with Built Up Edge More Than 3ha*. Applying the density in this paragraph, the development should incorporate around 140 – 145 dwellings to remain consistent with policy.

- Building heights are expressed simply in terms of storeys but not as physical heights, so it is difficult to assess their impact, especially in terms of loss of amenity for residents of Little Bookham Street and compliance with the Council's Policy EN4 on Character and Design. There is neither a definition of a storey nor whether this includes the height of the roof, which can be a substantial increase if pitched. The height to the top of the roofline in metres is required to assess this. The relationship to existing buildings needs to be based on the total visual mass of the building, including the roofline. In relation to this, we note that more of the site has buildings indicated as being 2.5 storeys than had been proposed original and in previous iterations. Refer to the extent of the orange shading in the graphic above. This means that more of the houses on Little Bookham Street will be in closer proximity to higher buildings in the developable area, exacerbating a loss of amenity.
- We note that the mix of Affordable Housing (H9 paragraph 3) has not been supported by the Affordable Housing Officer. This may require further review once the density of housing has been compared against Council policy and any required adjustments made to overall numbers.
- The visuals in *BMD.23.0069.RP.002\_Design\_and\_Access\_Statement\_Addendum* do not show any garages. What parking will be available to residential occupiers? There is also reference to the provision of fast EV chargers but no reference to ensuring adequacy of power supply; this is a concern as residents have raised concerns in the earlier Letters of Representation over the adequacy of the existing utility connections.
- Will the developer retain the freehold, and will the roads be adopted? If not, who will be maintaining common parts and bearing the costs? We note from the Design & Access Statement that there will be mown verges and other landscaping requiring maintenance. If there is to be a service charge, then this can become a significant on residents, especially those who have struggled to enter home ownership through affordable housing.
- The Community Orchard is a welcomed idea, but it is located in an area where the ground conditions are often wet. We doubt that an orchard in this location is realistic given soil conditions, as the extent of groundwater may lead to rapid root rot.



## 2. SANG.

On behalf of BRA, I submitted a letter dated 27<sup>th</sup> November 2024 to Piers Mason (see Appendix 5) regarding the SANG Management Plan prepared by Derek Finnie Associates and uploaded to the Planning Portal on 24/10/24. This confirms our continuing concerns over its long-term management and costs, which are challengeable. If not secured adequately, the risk is of the area reverting to a non-managed state and the whole proposal becoming a token to BNG.

Furthermore, there are inconsistencies concerning cycling in SANG, with a consequential uncertainty over costings. Some references are to *walking and cycling* whilst others are to *walking* only. There is reference also to circular cycling routes, but the routes are not clear on the plans unless they are the same as the walking routes. Irrespective of whether there is cycling in the SANG, we have concerns as to the type of surface on these paths and footpaths. They have been costed in the SANG

Management Plan as mown paths and there is no mention of any more durable surfacing or substrate. A mown path would be suitable neither for cyclists nor disabled in wheelchairs nor infants in pushchairs through many months especially in the autumn and winter, or indeed after any periods of heavy rain. Even if cycling is not permitted in the SANG, is the SANG to be accessible year-round to groups such as disabled residents in wheelchairs or parents with young in pushchairs?

The SANG Management Plan proposes in paragraph 5.2.1 that from Year 6 its management will transfer to the council or another 'competent authority' with the mechanism included within the Section 106 agreement. Bearing in mind that the development plus management costs for the SANG have been understated in our opinion, compounded by an incorrect calculation of the impact of inflation, it is essential that the Section 106 agreement incorporates:

- Realistic costs for the ongoing management and maintenance of the SANG.
- Their likely quantum after applying compounded inflation with a contingency (i.e. recognising that there may be periods of higher inflation).
- And recognises that pressures on public finances may affect the desire of the Council or other competent authorities to take on further cost burdens, especially if under-estimated initially.
- Leading to, who would manage and maintain the SANG if no such body is forthcoming?

These are essential to meeting Requirement 7 of the Policy DS8. Finally, the following needs to be undertaken in the creation of the SANG as it is omitted from the SANG Management Plan (V3):

- The Giant hogweed noted in the *Ecology Appendix 7\_BNG\_Report\_Nov\_24\_V2* needs to be destroyed and its prevention to be managed. This is not reflected in the costings for the SANG.
- An asbestos shed adjacent to FP76 and just within the SANG boundary needs to be removed safely (see Appendix 2).
- The nearby rubbish tip needs to be removed safely (see Appendix 2), as well as any rubbish or hazardous materials that may have been deposited elsewhere on the SANG and the other green space remaining in the Green Belt but are as yet undiscovered.

### **3. Heritage impact.**

We question whether the new locations of the Community Centre and the Gypsy & Traveller Pitches have paid due regard to the Policy EN6. This requires "*regard to the impact of new development on their fabric, integrity and significance, and their settings*".

- Whilst we appreciate the removal of the Community Centre from the area retained in the Green Belt, the revised location may impact adversely the amenity of nearby residents in Little Bookham Street and the Conservation Area due to potential noise, especially if it is used in the evening. We note that the Historic Environment Officer has questioned the proximity of the Community Centre in the response of 28/11/24. This is an area where there is less screening between the development and the houses sitting within the Little Bookham Conservation Area.



- Similarly, the proximity of the Gypsy & Traveller Pitches to the Conservation Area is a concern and the height of the pitches is not stated (merely that they are single storey), which may exacerbate their visibility from the homes on Little Bookham Street and in the Conservation Area. Refer to Appendix 1, where we have overlaid their location against the Conservation Area and noting the buildings that are designated in the Council's appraisal of 2011 as providing a "*positive contribution*".

- A significant amount of the green buffer shown on the previous illustrative masterplan between the development and the Conservation Area has been removed, in particular to the rear of 7 Little Bookham Street and of 9 the Post Cottage, which is a grade II listed building. This adversely affects the setting of these buildings which currently have no built development behind them. Refer to the changes marked in Appendix 3.
- The noise and visibility of the built development will damage the quiet setting of the Conservation Area. This is contrary to Requirement 3 of Policy DS8 which requires the setting of heritage assets to be conserved and where possible enhanced. BRA believes that to help fulfil this requirement a green buffer zone with a width of 15 metres is needed between the development and the length of the Conservation Area's boundary, rather than its reduction from 10 to 5 metres as confirmed by tga arboricultural consultants in its letter of 8/11/24. Refer to the changes marked in Appendix 3.

We have noted the consultation response by SCC's Archaeological Officer requiring a survey plus test dig, which we agree with and support. We trust the location of the trial trench will be determined by the Archaeological Officer, rather than influenced by the developer.

#### **4. Flood risk.**

Council Policy INF3 on Flood Risk states that the Council will work with a number of bodies including the Catchment Partnership to mitigate risk and *inter alia* prevent pollution of ground water. This is another reason for the Council to engage directly with SERT as a co-host of the River Mole Catchment Partnership.

#### **Wastewater**

As has been reflected in previous letters of representation, the other risk in this area has been from the historically inadequate sewerage infrastructure. Not only are there problems already with sewage infrastructure in Little Bookham without more houses, in the autumn of 2023 a significant part of the developable area was flooded with raw sewage for several weeks from a failure of the sewer running through the area. The Applicant has not responded to our previous concerns regarding this existing 150mm foul sewer, along with associated existing property connections from Water Lane and The Saddlery. How will this remain accessible for maintenance once built over?

Requirement 15 of Policy DS8 is "*to ensure that the necessary upgrades to the off-site wastewater infrastructure can be delivered*". We remain concerned that there are no guarantees of such major infrastructure upgrading will be undertaken by Thames Water (or a successor body), especially with its continued parlous financial state and the pressures on it to make many fold improvements across a wide area. We note that its consultation response of 1/3/24 makes no mention of upgrading the existing downstream infrastructure to create the capacity for the additional dwellings which will feed into a new pipeline exiting to Burnhams Road.

#### **Surface Water Drainage**

Also, we are unclear from the documents submitted whether the full Sequential Testing required under Policy INF3 has been completed as yet. We remain concerned that Requirements 9 and 19 on surface water flooding and flood risk betterment will not be met. The placement of the LEAP and the car parking for the SANG is in an area known to suffer historically from significant groundwater, so the drainage and surface treatment needs to be appropriate to this additional pressure, especially with one impact on climate change being significantly more rainwater in a deluge as has been experienced in a number of instances this winter. The paths and cycle routes need to be adequately constructed to ensure they do not become unusable in times of high rainfall and during the winter months, where they are already notoriously muddy and indeed impassable at Fox Lane.

## 5. Chalk Streams.

We are very concerned that the evidence of Chalk Streams has been rebutted by Derek Finnie Associates on behalf of the Applicant, in a document with factual inaccuracies. Rather than critique each assertion in that document, I have highlighted below key dates and set out in Appendix 4 a more detailed timeline:

- In May 2022, Natural England issued a call for evidence of chalk streams. Following this, data submitted for two chalk river additions was reviewed and approved by Natural England ('NE') in August 2022, one of which runs through the Policy DS8 site. Neither of these have yet been reflected in an update of NE's Authoritative Map, as the data in that relates to April 2022, and has not been updated since publication.
- There was a further call for evidence by South East Rivers Trust ('SERT') in October 2022 and the data was submitted also to SERT using the latter's mapping tool. As you know, SERT is a co-host of the River Mole Catchment Partnership with Surrey Wildlife Trust. Mole Valley District Council is also a member of this partnership.
- Following the validation by SERT of the mapped data through a physical survey of the watercourses, it was uploaded by SERT to ('NE') but after an extensive delay. The successful upload from SERT to NE was on 22/8/24 at 5:04pm.
- Since April 2022 was the last update to the dataset for NE's Authoritative Map and the NE work is ongoing, no weight can be derived from these approved additions being omitted. Our understanding from NE, as recently as 30/10/24, is that there are no plans for the map to be updated within the current financial year.

Whilst the Council's officers have asserted to date that they will recognise only evidence reflected in NE's mapping, I draw to your attention the Council's Policy S5 which states that the Council "*will work with ... the River Mole Catchment Partnership*" amongst others. As SERT is a member of this partnership, together with MVDC, we suggest strongly that the Council engages directly with SERT to obtain the data files (if required) and to validate the existence of this data. Not to do so, or to deny the existence of the data, is to use the under-resourcing at NE in the knowledge that its map pre-dates the dataset from SERT and will remain out-of-date for some time yet. All of the above can be validated through direct communication with Dr Chris Gardner, who leads the Science and Partnerships Team in SERT.

## 6. Ecology.

The document *Ecology\_Appendix\_7\_BNG\_Report\_Nov\_24\_V2* presents in 4.1.1 the headline results of the BNG calculation but not the detail, preventing its validation. We request that the full set of worksheets is released to permit thorough checking. There is no indication that the watercourse metric has been included, which would be mandated through the watercourses mapped by SERT (a consultee of the District Council through the River Mole Catchment Partnership) and in the dataset accepted by Natural England.

Referencing the document *Further\_Ecology\_Info\_131124\_Redacted*:

- There is a significant redaction on page 2. Does this relate to a species of mammal, rather than Ancient Woodland, and what is the content?
- We disagree with the assertion that the Biodiversity Net Gain need not apply on account of timing as it was in the draft Local Plan, notwithstanding the claim that it has been exceeded in any event.
- The final section references Council Note 15 to suggest that Surrey Wildlife Trust does not believe that chalk streams exist in this vicinity. However, Note 15 pre-dates the mapping of the

chalk streams and their validation by SERT (as set out in Appendix 4), so it is understandable that it could not anticipate the later dataset with their presence.

## **7. Access points.**

### **Walking & Cycling**

Policy DS8 Requirement 17 refers to walking and cycling routes supporting active travel. There are inconsistencies on whether there is cycle access from Fox Lane. Some documents state that it is pedestrian access only, whilst the Design & Access Statement suggests cycling access. If the latter, this will require agreement where such access is a part of or parallel to the existing Public Right of Way. We note that the Senior Countryside Access Officer is awaiting still further clarification on this. Also, there are no details on how pedestrians and cyclists entering or exiting at Fox Lane will be discouraged from using the shortest route to the station, which runs through a private road that is both unlit and narrow with no pavement.

### **Gypsy & Travellers**

There is insufficient clarity on the Gypsy & Traveller Pitches in terms of their access. The swept path analysis incorporated in *ITB8170-024\_TN\_Minor\_Access\_Updates* is based on a large SUV towing a twin-axle caravan. As we have submitted previously, it is common for users of such pitches to have larger vehicles and for the accommodation to be a mobile home, which may require a low loader. The swept path analysis needs to be corrected for this and show the entire access path between the Lower Road and the pitches. Also, noise from the frequent movement of commercial vehicles, noted as a consideration in national design guidance for such sites, may impact residents in the Little Bookham Conservation Area. Furthermore, such frequent movement of commercial vehicles along a shared access with users of the Community Centre and/ or housing raises health & safety concerns if traffic and pedestrians are not separated, especially if early years education use as set out in Requirement 11 of Policy DS8 comes to fruition.

## **8. Traffic.**

Projected increases in traffic along the Lower Road remain a concern of the BRA and were cited in 77% of the representations from residents. Requirement 14 for Policy DS8 requires that the developer *“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.”*

Using figures from the developer’s traffic modelling, the projected increase in traffic along the Lower Road in the weekday peak hours may be of the order +60% (as set out in Section 12.6 of the BRA Letter of Representation of 24/3/24). Notwithstanding Surrey County Council not recognising that such increase having an impact, we believe that a 60% increase is *significant* and thus breaches Requirement 14. Furthermore, we question the extent to which it is being mitigated to an acceptable degree compliant with Requirement 18, which addresses pedestrian and cyclist safety. The distance from the entrance/ egress of the site to Preston Cross is short and we are unaware of proposals to ease the cumulative impact of vehicles plus cyclists entering/ leaving site, general traffic on the Lower Road, buses stopping within close vicinity on Lower Road and traffic delayed at the Preston Cross roundabout.

## **9. Green Belt.**

We acknowledge that the recently adopted Local Plan retains within the Green Belt an area that had been proposed previously for development (known as Area BB), which has been cited by the Applicant as the reason to relocate the Gypsy/Traveller accommodation and the proposed Community



Centre. Requirement 2 of Policy DS8 talks about *clearly defined* and *permanent* boundaries between the area of Green Belt and residential development. These need to be “*consistent with the character of the surrounding environment*”. The Applicant has not demonstrated that this will be achieved.

Prior to the adoption of the Local Plan, the existing boundary at Preston Farm was clearly defined by the Saddlery and the rear gardens of houses on Little Bookham Street as well as areas of mature woodland (consistent with para 149 (f) of the NPPF). They provided a defensible boundary, but the new boundary between that Area BA and the Area BB on the Policies Map is defined by an old farm track and not a defensible boundary such as a road, fence, wall or hedge. Neither can we see any plans to put one in place, which could risk encroachment onto the land remaining in the Green Belt. The strip between the Area BA and the Area BB clearly requires a boundary that is defensible and permanent. The BRA notes also that the existing features around the central ponds and the woodland belt only provide a moderately strong defensible boundary and that these boundaries may require strengthening to ensure they remain defensible and permanent. This is addressed in the document *RPTS HCUK Report 7506 Bookham Greenbelt Statement V5 Addendum 27<sup>th</sup> November 2024*.

We understand that an issue may arise also with the location of the LEAP relative to The Saddlery and the potential encroachment on a zone protected within the covenants on the Saddlery. We believe that this will be addressed under a separate LoR on behalf of the residents of the Saddlery.

Notwithstanding this, most of the local community remain disappointed with the loss of Green Belt in the developable area.

### **In Conclusion**

This remains an outline application to which the Bookham Residents Association strongly objects as the general nature of the proposed development is unchanged. Accordingly, the reasons for objection set out in our previous letters remain. This is endorsed by the fact that around 250 objections to the application have been submitted by Bookham’s residents.

The BRA remains concerned that, as an Outline Application with all matters reserved except for means of access, a full appraisal of its potential adverse effects is 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 homes, and the basis of financing the management of completed development including the potential community assets and the SANG are uncertain and will probably result in the Council and/or members of the local community bearing unexpected and continuing costs.

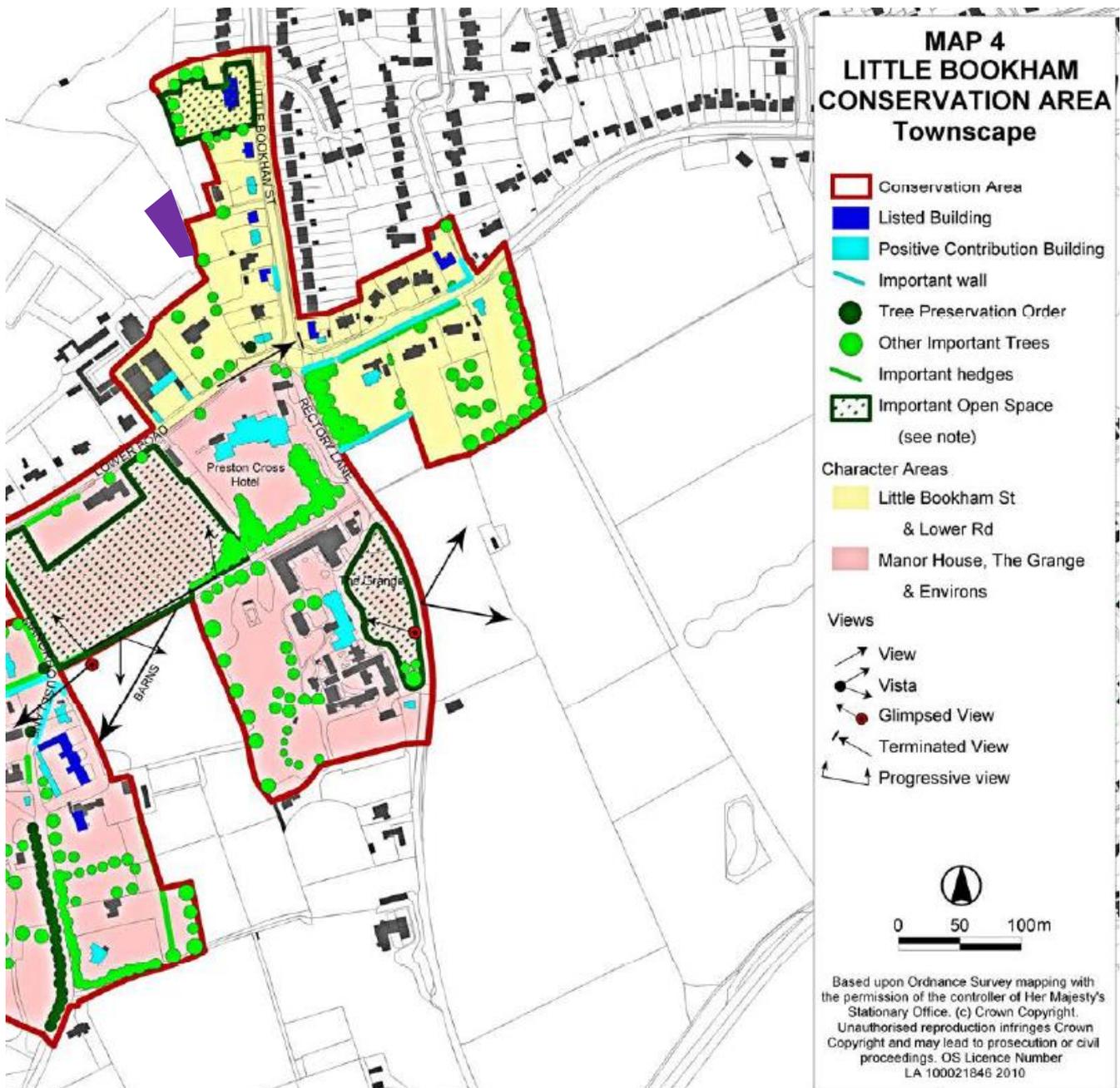
Yours faithfully

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.

## APPENDIX 1 Little Bookham Conservation Area

The approximate location of the Gypsy & Traveller Pitches taken from the Design & Access Statement is shown below in purple. The buildings which are designated as 'making a positive contribution' are shown in turquoise. The map is from the MVDC document *Little Bookham Conservation Area Appraisal & Management Plan* of June 2011.



## APPENDIX 2 Unbudgeted Clearing Needed to Create SANG



Preston Farm — showing problems needing clearing alongside FP76 during creation of the SANG. Both the corrugated shed and rubbish tip are at north western end of track coming out of the rear of The Saddlery and between the 2 southern ponds



### APPENDIX 3 Changes To Screening Zones

Comparing the two revisions of BMD.23.0069.DR.P003\_Parameter Plan\_Green Infrastructure, the extent of screening appears to have reduced within the purple dashed zones and along the dashed line marked on Revision P2, contrasted against Revision P5. If there are further areas or this is an incorrect interpretation of the drawing, these require confirmation by the Developer.

Revision P2



Revision P5



## APPENDIX 4 Mapping of Chalk Streams & Dataset Submission

We set out below the timeline detailing how and when the chalk streams were mapped, their validation, by whom and the submission of the dataset to Natural England:

- The data in Natural England's (NE's) authoritative map was "based on Environment Agency Detailed River Network v3. Data prepared Autumn 2021". The data in it was updated and published April 1, 2022. NE confirmed 30/10/24 that there has not been any update to the data reflected in this map since its publication.
- In May 2022, Natural England issued a call for evidence and published "*Guidance For Stakeholders On Proposing Local Refinements To The BAP Map Of Chalk Rivers*" to recognise properly, protect and restore the network of smaller headwater chalk streams, including 'winterbournes' due to their great importance for biodiversity. Cross-referencing Derek Finnie's rebuttal against this clear guidance highlights numerous errors with respect to the nature of winterbourne headwaters and their associated calcareous fen (lowland fen), how superficial geologies that overlay a chalk aquifer need to be considered, and the requirement to discount human activities when natural hydrological pathways exist within the headwaters.
- This NE call for evidence provided the data portal [Discovering priority habitats](#) as a means through which stakeholder data could be uploaded for validation and approval by Natural England's freshwater experts. A Bookham resident did so and, following dialogue and the exchange of photographic and video evidence with Chris Mainstone (co-author of the Natural England Guidance) and other NE experts, two "chalk river additions" in Bookham were approved in August 2022 by Natural England. These were the Earbourne in the vicinity of the Lower Road Recreation Ground and another through the Preston Farm site. Both additions are visible on the portal. Furthermore, Chris Mainstone's assessment and a screenshot from the portal have been provided previously to Mole Valley Planning.
- The South East Rivers Trust ('SERT') co-hosts the River Mole Catchment Partnership with Surrey Wildlife Trust, and Dr Chris Gardner (SERT's Head of Science & Partnerships) is the Partnership's freshwater expert. Given Mole Valley District Council is also a member of this partnership, it will be aware that SERT is the partner that leads on freshwater matters.
- As a result of the Natural England's call for evidence, SERT launched its [South East Chalk Stream Mapping Project](#) in October 2022. The photographic and video evidence that had already been submitted to Natural England was uploaded also to SERT's project portal. In December 2022, SERT's freshwater experts conducted physical surveys at representative chalk streams sites around Bookham. For the chalk streams in the vicinity of Preston Farm, SERT surveyed the watercourses around the physical perimeter of the Preston Farm site as there was not public access throughout the site.
- SERT's Chalk Stream Mapping Project accepted evidence from across the South East. Understandably, collating the evidence and conducting physical surveys took time. SERT's project discovered and then ground-truthed over 80 new chalk streams, totalling in excess of 150km. Given the volume of data, SERT exported its data in *shape files* format to deliver it to Natural England ('NE') on 22<sup>nd</sup> August 2024 at 5:04pm. Mole Valley District Council can obtain these shape files.

Assuming Mole Valley has trained its planning officers to recognise the quality (or otherwise) of the applications containing watercourses <https://www.local.gov.uk/pas/events/pas-past-events/2023-events/watercourse-metric-biodiversity-training-local-planners>, it will be aware already that the Applicant has yet to submit documents that describe all of the required watercourses correctly. Such documents should identify and assess all watercourses, i.e. all within the red boundary (including the network on the Eastern side of the site), and those located 10m beyond the red line boundary (i.e. where site has an impact on the riparian zones). This would call into question also the referencing of ephemeral headwater streams as ditches.



**APPENDIX 5  
BRA Letter Regarding the SANG Management Plan**



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27<sup>th</sup> November 2024

Dear Piers,

**Planning Application: MO/2024/0096 Land north of Lower Road and west of Little Bookham Street, Bookham. SANG Management Plan.**

I am writing to raise some concerns which we have on the costings in the plan for the management of the SANG, prepared by Derek Finnie Associates and uploaded on 24/10/24 (titled Preston Farm SANG Management Plan v3). I have highlighted some instances below, which suggest that a thorough validation of the costings needs to be undertaken by the Council's officers. Indeed, there are a number of areas where the Council can compare the proposals directly against its experience of undertaking similar work or managing similar areas.

In Summary

We are not seeking to undertake a detailed evaluation of the costings, many of which are in areas where the Council has direct experience, but we wish to flag our concern that the costings presented may considerably underestimate the likely outturn. Especially as:

- Natural England is seeking a sound plan for the creation and management of the SANG. We are not convinced that v3 is providing this as yet.
- Whatever body is responsible for management of the SANG from Year 6, it needs to work from sound cost estimates. An underestimate may present financial and/or quality of maintenance risks to the Council or other successor body after year 6.
- Whilst the SANG is Thakeham's responsibility to create and manage prior to then, it too needs sound costings to ensure that underestimates in one area do not lead to cost cutting elsewhere.

Calculation of Inflation

This does not appear to have been compounded at a consistent % rate, rather it has been allowed as a set monetary sum over the stated period and thus is a diminishing %.

Years 1 – 5 budgeted cost total of Section B as per report	£81,783
Same with compounded inflation from end of year 1 using 3%	£84,309

This difference may not be that great over years 1 - 5 but looking at the Section C totals for years 6 - 80:

Projected total maintenance cost for the next 75 years	£1,028,710
As above but with compound inflation at 3%	<u>£3,070,829</u>
Aggregate impact over the 75 years	<u>£2,042,119</u>

Furthermore, we note that the basis of the costs in Section C is unchanged from Section B, though there will have been five years of cost inflation by that stage as Section C starts from Year 6.

### Construction of paths

The SANG is stated as having 2.3km of paths for which an area of 5,600m<sup>2</sup> has been allowed, thus the paths would be 2m wide. ISU3 of Section A allows 50p/m<sup>2</sup>, or £1 per metre of path for labour only and no cost for materials. We are unclear from the documents what the expectation is for any surface treatment of paths or whether there are to be any board walks, as significant areas of the SANG are prone to flooding. This could of course affect the costings. Could you advise whether the budgeted costing is consistent with the Council's and Natural England's requirements for this SANG and advise the detail of what that requirement may be?

### Low costs

Some costings appear to be at the low end of a range of realistic costs, which in some instances may beg the question as to the quality allowed:

- Signage – the cost for way markers would be consistent with steel but how does that accord with the Council's policies on style and durability of signage?
- Benches – is the allowance consistent with a bench that will last, rather than requiring replacement once the management comes under the local authority or another body from year 6?
- Tree surgery – a higher rate has been allowed than for landscaping, but it remains low against the experience of some of our members for similar work?

### Watering of Newly Planted Trees

The report suggests in 2.19 that newly planted trees are watered as below but the basis of the budgeted cost is not consistent with this:

Period (from 2.19)	Duration (from 2.19)	Frequency (from 2.19)	Implication
Height of summer	2 months (July/ August)	Every other day – 25L	31 visits
Spring & autumn	4 months	Every other day – 10L	61 visits
Based on the above and allowing, say, a 25% reduction in the requirement for spring/ autumn during periods of rain would yield an aggregate			Say 75 visits per annum
Frequency allowed under B7 in budgeted costs based on the note			20 visits per annum
Cost implication			3.75x budgeted cost in years 1 and 2

### VAT Implication

Whilst the Council does have the ability to offset some VAT, our understanding is that any unrecovered input VAT is reflected as a cost. If we are correct in interpreting that much of the input to its ongoing management will be under a contract, rather than direct labour, then this will have a VAT implication. During years 1 – 5, the plan states in 5.1.1 that Thakeham will manage the SANG; so any VAT implication prior to Year 6 need not concern the Council. However, from year 6 (when the ongoing management is handed across under 5.2.1) if all of the labour for the management of the SANG was under contract, then the implication will be £1,460 in that year using the Section C costs. Once inflation is included and projecting across the 75 years of the SANG being managed by the Council, or other competent body, this adds a further £390,000 to the costs of management. Should any costs have been under-estimated, then this gap will widen. We believe that



should the management of the SANG come under the Council or another competent body at any stage, such as one with charitable status, input VAT may be a cost to be budgeted as there is no direct output VAT from the SANG.

#### Ownership

Can you advise what the proposal is for ownership of the SANG from Year 6, based on 5.2.1? The report refers to handing over the SANG but could be read ambiguously in terms of ownership as opposed to management.

#### In Conclusion

We would be interested to learn the Council's view of the submitted management plan. We would appreciate if any valid concerns raised and not corrected are passed to Natural England.

With best regards,

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 BSc FRICS  
Chairman Planning Sub Committee.