



The Head of Planning,
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Planning correspondence by email to:
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9th May 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. Additional information received in regard to Transport, Ecology, Trees and other matters.

I acknowledge receipt of the letter from Piers Mason dated 29th April 2024, notifying me of the additional information submitted by the Applicant in respect of this Outline Planning Application.

The Bookham Residents Association has examined this additional information in close detail and has found nothing that has led us to amend the views and statements set out in our initial Letter of Representation dated 20th March 2024, where we strongly objected to the proposed development. I set out below our representations on the additional information submitted, utilising, where relevant, the headings adopted on the Documents section of the Planning Portal.

A. Derek Finnie Associates Technical Response to Surrey Wildlife Trust

In our opinion, the Ecological Impact Assessment dated January 2024 shows a lack of evidence on research in several areas, including bats and great crested newts. We are grateful for the information and advice provided by Surrey Wildlife Trust.

Thames Basin Heaths SPA

We disagree with Derek Finnie Associates. The objection should not be removed until all of Natural England's requirements have been met. These include a SANG Management Plan to include quantity, funding into perpetuity and a site visit by an officer from Natural England.

SWT have advised the Local Planning Authority to request a consultation with Natural England on its position for the Mole Gap to Reigate Escarpment SAC and the SSSI with the ecological zone of influence. This has been identified as 2km by Derek Finnie Associates.

Water Courses

SWT pointed out the lack of a completed watercourse unit, a point that Derek Finnie did not address. The site includes several winterbourne chalk streams, and their riparian zones need to be referenced correctly as lowland fen. It is mandatory to complete this unit for all watercourses that are inside the red line or within 10m outside of the red line for the site. The

Thakeham reports to date omit all references to the watercourses on the Eastern side. These need to be included as these are chalk streams with fens as well.

Groundwater Flooding

The source of our groundwater flooding is not unknown as Derek Finnie Associates claim. It was identified in the relevant "Section 19 Flood Investigation Report: Mole Valley 28 October 2015" section 9.2 states MV identified that Bookham is affected by springs and surface water flooding that closed roads and flooded properties). This is because we are on the winterbourne reaches of the North Downs' dip slopes, multiple "dry valleys" run through Bookham hence the whole of Bookham is affected. There is significant flow along these winterbourne reaches to the south of the A246 when the water table is very high. This is why the EA map shows all of Bookham (and Fetcham) as areas with critical drainage issues.

Designated Sites

Section 4.2.2 of the Ecological Impact Assessment details that four Sites of Nature Conservation Importance ('SNCI') are located within 2km of the application site, with the nearest being Thornet Wood, Effingham. One SNCI is located approximately 250m to the west of the application site. In its review SWT confirms Thornet Wood, Effingham SNCI as being approximately 100m to the west of the application site.

Section 5.1 of the EIA scopes out construction and operational phase impacts upon non-statutory designated sites. SWT states that the EIA lacks sufficient evidence base, or evidence of an assessment to allow this conclusion to be acceptable.

Derek Finnie Associates conclude that as Thornet Wood is under private ownership and public ingress is limited to the southeast corner. This should not negate the need for a EIA.

Habitats - Ancient Woodland & Wildlife Corridors

SWT confirms "The level of evaluation and assessment for ancient woodland, within the ecological zone of influence, as defined by the Ecological Impact Assessment (EIA), is insufficient in assessing construction and operational phase impacts."

The BRA agrees with this conclusion. We confirm that there is direct access from the application site to Oaken Wood which is 10.9ha of Ancient Replanted Woodland. The public footpaths 76 & 84 are accessible from the west of the application site and regularly used on a daily basis by ramblers and dog walkers. Undoubtedly the additional footfall from the proposed development and SANG could have a detrimental impact on the Ancient Woodland as there are no fences to stop incursion into the woods. The woods are full of bluebells and there is a field of primroses which is incredible. Of serious concern is the plan to site a 2ha attenuation basin in the SANG area next to Oaken Wood. Ground works in this area could cause considerable harm to the environment and destroy the biodiversity which now inhabits it.

There has been no evaluation or assessment of Oaken Wood by Thakeham Homes and the EIA is insufficient in assessing construction and operational phase impacts. This is entirely unsatisfactory, and we would also request that the Ecological Impact Assessment is updated prior to determination. This should also include an assessment of the wastewater sewer connection which will go through G218 woodland.

Amphibians

We have previously advised the Council that there is a population of Great Crested Newts on Bookham Commons which is 750m from the development site and SWT state it is feasible that they are present on Preston Farm. This requires access for independent testing and verification. There are several wet ditches and areas which are ideal for Great Crested Newts on Preston Farm and we understand from residents that common toads have also been seen in the area. We look forward to reading the eDNA survey when available.

Fauna within the proposed development

The BRA has been advised that certain parts of the research of fauna undertaken by the team and submitted to MVDC should not be placed in the Public Domain. Therefore, this has been redacted from the document.

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Bats & Bechstein Bats

SWT is concerned that the EIA and the information to inform Habitat Regulation Assessment has no consideration of the advice provided by the Bat Conservation Trust and Natural England for the Core Sustenance Zone to be extended to 3km for Bechstein bats. They write "our own research into the location of the application site indicates a reasonable likelihood that Bechstein's bat are active in the local landscape". Derek Finnie Associates think this is an overestimate and he appears to be pinning his assumption on a planning enquiry in Effingham. The BRA would prefer the Council to rely on the advice provided by SWT, which is wholly independent of the developer.

We would bring the Council's attention to the following on page 6 of the Bat Survey:

3.2.5 An eighth species, Barbastelle's bat, was recorded from a single detector (Detector 2A, Figure 2), on three occasions in June 2023, totalling four registrations. Given the paucity of registration, it would appear that a single, or low number of bats, are commuting through the



Site on an infrequent basis. Preliminary Bat Roost Assessment 3.2.6.

Barbastelles are rare and have recently been given the status of Favourable Conservation by Natural England ('NE'). NE published a new record on 8th March 2024 confirming Favourable Conservation Status is the minimum threshold at which we can be confident that the species is thriving in England and is expected to continue to thrive sustainably in the future. According to

the survey only one was detected on Preston Farm. However, there is likely to be more as they live in woodland and forage over a wide area. Hence Preston Farm is an ideal habitat for this species.

Residents wrote about bat habitats in their representations, and these should not be ignored because several species have been identified in the survey. However, some areas of the 28ha were not monitored and does not cover fully the proposed SANG, so the results could be unreliable. The BRA feels there is a conflict of interest if the LPA relies solely on the research and evidence provided by a consultant who is working for the developer, which has a vested interest. A far safer approach would be for the Council to instruct independent external consultants to do the research on protected species to ensure that the data is comprehensive and reliable.

BNG Assessment

We note that Derek Finnie Associates confirm that it is incumbent on the developer to demonstrate the 10% BNG in principle, whereas MVDC have a minimum threshold of 20% BNG. Furthermore, some residents have questioned the basis of the BNG calculation and whether the approach may result in the gain being over-stated. We expect the Council to assure itself on the correctness of the calculations.

B. Tree and Landscaping proposals

TGA.2578.TSP.001A_(Sheets_1_to_5)_1

Below are the comments of the person responsible for tree matters on the BRA Planning sub-committee, who is also a Bookham Tree Warden.

"I am rather concerned at what is coming across as the evasive manner of Thakeham Homes with regards to tree matters. Whilst these plans appear to show and identify the individual trees, their accuracy cannot be verified without access to the site, nor can the health of the individual trees be checked. Additionally, Thakeham Homes do not consider it necessary to give any further information on tree matters at this stage as requested by MVDC.

So far it has been muted that the following trees will need to be removed:

- 1 mature and healthy Lime close to the current entrance of 330 Lower Road. On verge and, therefore, the responsibility of SCC
- 1 semi-mature and healthy Oak (approx. 125 years of age) located on the verge of Water Lane close to the proposed Traveller's entrance. As this tree is more than 3.75 metres from the edge of the road it is not recorded as being a SCC tree and, therefore, must be assumed it is owned by Preston Farm.
- A whole row of Horse Chestnut trees (most of which are healthy) along the current access track which is proposed to be widened and become the new approach road to the development.

This site has been largely under-managed for many years which has allowed the wooded areas to revert to its natural wild state, resulting in good biodiversity. Under Biodiversity Net Gain (BNG) criteria Wet Woodland is classified as high distinctiveness and Wood Pasture and

Parkland containing veteran or ancient trees as very high. This site has both these categories and there is a high probability that it contains veteran trees especially with regards to Oaks.

With a general feeling of unease, we would appreciate it if we could have a meeting with the MVDC Tree Officer to discuss this matter further with regards to what options are available at this preliminary stage of this Application to prevent any wanton removal of trees.”

C. Transport and/or Travel – the 5 new documents.

ITB8170-GA-026B

This document updates the swept path using a 4x4 luxury caravan towed by a car (or SUV). This misses the point that travellers at settled sites use mobile homes of various sizes, which are towed by a commercial vehicle or brought on a low-loader. The overall length and width are greater than that shown in the swept path analysis. 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, the swept path shown is incorrect. The route needs to be tested also for vertical clearance as the height during transport is greater than that of the home when pitched.

The re-modelling must be coordinated with a survey of the trees in the area and the land drainage ditches. For example, close to the proposed entrance to the site for travellers is a 125-year-old oak tree with a diameter at breast height of 102cm. This oak is only 3.9 metres from the current edge of the tarmacked road. Any new road works will be within this tree's root protection area and will likely seriously impair this tree's future growth. In addition, increased heavy traffic will lead to soil compaction.

The proposed exit route runs across land with a land drainage ditch which removes significant volumes of groundwater from the property opposite and flowing down Water Lane. The functioning of this must be preserved and not impaired by the exit route.
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ITB8170-GA-005_Rev_K

When the swept path analysis is updated as above to reflected wider vehicles using Water Lane, this plan will require updating also. We note that there are a number of requirements in SCC's response of 20/3/2024 from Ronald Musasiwa to be met still in such an update to accommodate larger vehicles. These will have larger swept paths and blind spots on turning, which may impact pedestrian and cyclist safety.

The drawing shows the proposed arrangements at this junction and indicates a 2m wide footway across the corner of the top eastern grass verge very close to the junction. The whole verge is raised above the road level by *circa* 50cm and is rough grass. It is not clear how the footway would be surfaced and whether it would be at the level of the verge or sunken through. We suggest that it would be safer to reduce the level of the verge to road level. However, the verge has a number of pieces of telecom/lighting equipment, as shown in the upper photo to the right. The grey pole is a new lamp standard, as previous one was demolished in a non-injury accident around 22/09/23 (referenced below also under 2.1.8 under ITB8170-022A). The wooden pole is the BT phone line which runs down the lane through the trees. It is presumably connected to the concrete plinth on the ground with the marking 'PO'. At the back of the verge to the right is a green/grey telecoms box, adjacent to a concrete plinth on the ground with the marking 'NYNEX' (we understand it is probably now used by Virgin Media).



The visibility turning east out of Water Lane is poor, due to a protruding tree/hedge line between the corner house and 340 Lower Road. This is shown in the photo to the right.



The proposed crossing across Lower Road will potentially be quite busy at the beginning and end of the school day for both St Lawrence Primary and Howard of Effingham secondary schools. We are concerned that with limited visibility and possibly deep in conversation with friends, or listening to music on headphones, they might try crossing the road at a dangerous time with an inadequate awareness of traffic.

We are also concerned about the hazards to pedestrians from vehicles exiting Manor House Lane and Water Lane and immediately encountering pedestrians via an informal crossing, possibly without proper due care and attention. Perhaps SCC Highways should consider a more visible zebra style crossing with beacons in this location?

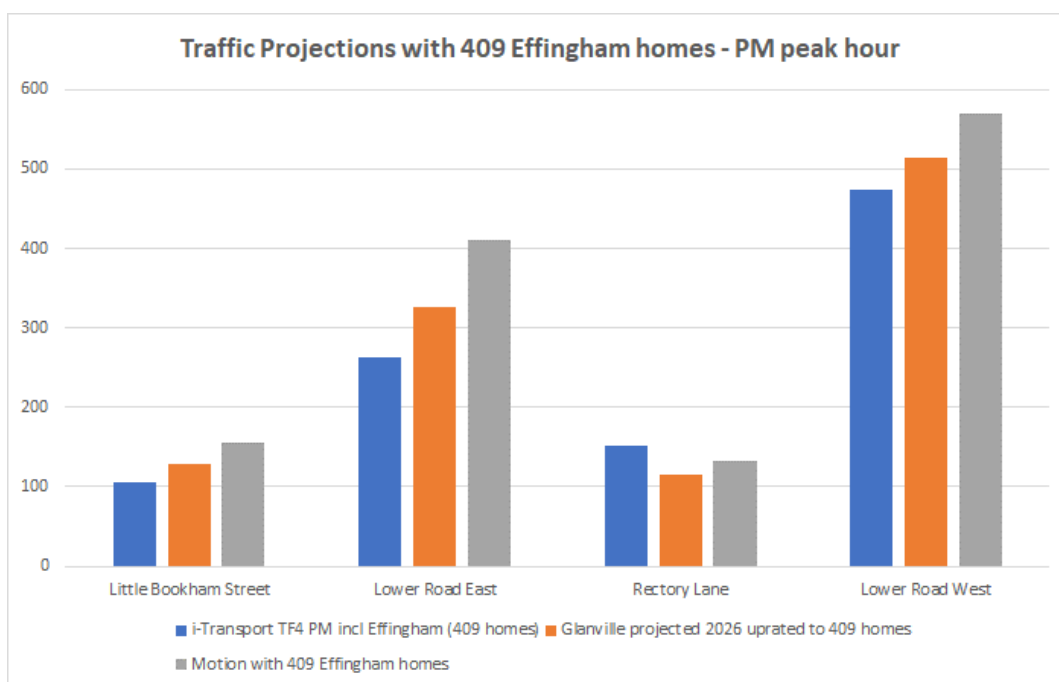
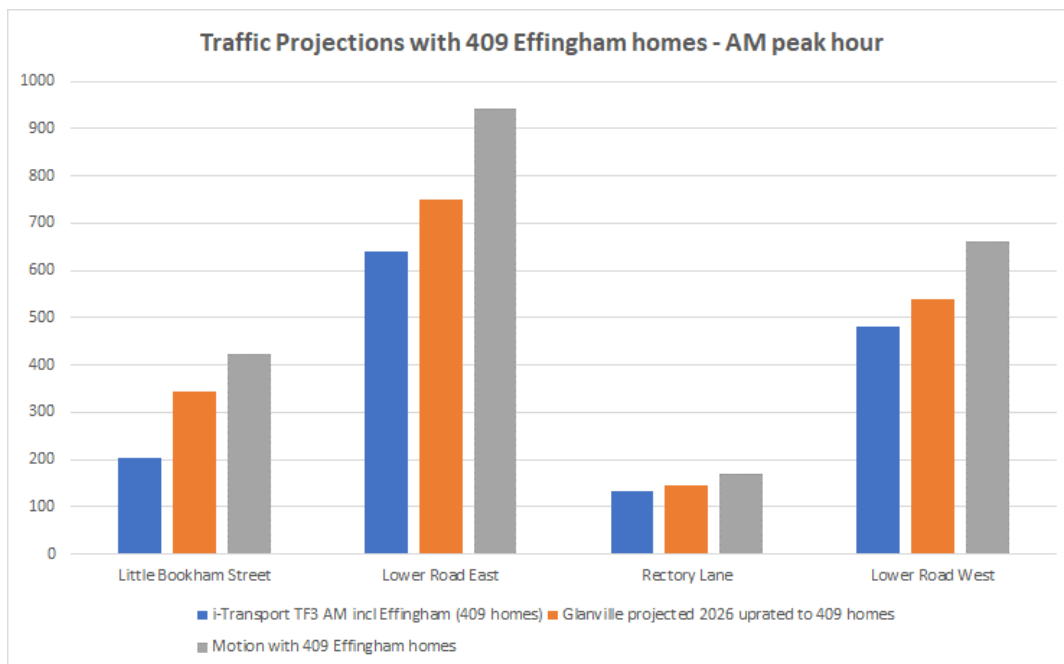
Any works in this area will need to consider that there is likely to be power cabling, gas lines and sewer lines in close proximity to this verge. This will require surveying appropriately.

ITB8170-022A_Response_to_SCC_consultation_comments

Further to the comments on the above two documents, referencing the numbered paragraphs:

- 2.1.2 As above, the safety of a footway and shared cycle path will be undermined by the risk from larger commercial vehicles. And passing places will need to be much longer than suggested, which may require significant removal of trees and hedgerows. The latter will have an adverse impact on flooding in an area prone already to significant flooding.
- 2.1.7 It is fallacious to suggest that there will not be an increase in vehicle movements. Semi-permanent travellers tend to run their businesses from their homes so there will be traffic associated with this.
- 2.1.8 Whilst there may have been no recorded personal injury accidents on Water Lane or its junction with the Lower Road in the last 5 years, there have been at least three accidents not involving personal injury. In April of last year a car exiting Manor House Lane (opposite Water Lane) hit a vehicle on the Lower Road. In September 2022, a vehicle hit and brought down the lamppost at the eastern corner of the junction at the point where pedestrians will cross. And, about 15 years ago a vehicle hit the wooden BT pole. Therefore, we believe that the consideration of risks to road safety for the future must include also non-injury accidents, especially with potentially much increased pedestrian and cycle use.
- 2.1.14 We note that Water Lane can meet this condition. A similar consideration needs to be extended to the cycle path on Lower Road from Preston Cross to Effingham, as it does not extend the full way.
- 2.1.19 We repeat the above comments in relation to: (i) width of footway proposed as the road may require widening for commercial vehicles; (ii) the size of passing places required to allow, say, two low-loaders to pass.
- 2.1.20 The trees and hedgerows affected will require re-assessment. There may be trees not in the stated category. The removal of trees reduces the ability for groundwater absorption.
- 3.1.2 Whilst the provision and short-term financing of a demand responsive bus service is laudable, it will deter people from driving only if it is frequent and prompt and continues into the longer term. Moreover, we note that Thakeham Homes is seeking to refute this requirement so the introduction of any such service would fall onto SCC. If so, we question whether SCC will introduce it against other financial pressures and a constrained public purse.
- 3.1.4 In the Bookham Residents Association representation dated 20/3/24, we noted the potential for the rapid build-up of queues behind stopping buses, vehicles trying to enter the Preston Farm development together with the proximity of Preston Cross roundabout and thus the potential for temporary localised gridlock.
- 3.1.5 The hourly bus service is one reason why many residents drive. The infrequency of was noted in the letters of representation from residents.
- 3.1.7 A significant number of commuting residents commented in their letters of representation that they drive to Effingham because of the infrequent rail service from Bookham and would welcome improved parking in Effingham to mitigate. For these commuters, walking distance and a bus service are academic.
- 3.1.8 The residents as above would disagree with this statement.

- 3.1.12 This response ignores the fact that the shortest route will be along Burnhams Road, which is a private road, and commuters will generally take the shortest route. See Section 10.2 of Appendix 1 of the Bookham Residents Association representation dated 20/3/24 and also note the objection from the Burnhams Road Residents Association.
- 3.1.15 This contradicts 3.1.2 by challenging the provision of a demand responsive bus service.
- 3.1.16 Improved bus stops and crossings with the existing frequency of buses will not deter residents from driving.
- 4.2.1 We note the dates given, but the daily ATC counts for the individual days have not been released into the public domain as yet.
- 4.2.2 It is incorrect to assume that all drivers will follow the recommended diversion route and re-joining point. There will be many drivers who, as locals knowing the road network, then follow their own diversion routes to avoid possible delays rejoining Lower Road and to reach destinations past the Effingham end of Lower Road.
- 4.2.4 We cannot reconcile the data purporting to be the ATC with that in TF1/ TF2 of the i-Transport submission. The latter shows higher traffic flows of 932pcu adjacent to 330 Lower Road in the AM peak and 631pcu in the PM peak.
- 4.2.6 We note that the 2023 Turning Count (possible road closure) is closer to the TF1 data.
- 4.2.8 Similarly, we could not reconcile the traffic counts with the data for Rectory Lane in TF1, although the figures appear much closer at 229pcu for the AM peak hour and 130pcu for the PM peak hour.
- 4.2.10 We disagree with this statement. Having compared the 'Effingham development only' traffic counts by i-Transport against those by Glanville (uprated from 310 to 409 homes in Effingham) and Motion (with 409 homes in Effingham), the i-Transport counts are the lowest. These represent the baseline where the approved developments in Effingham are completed but prior to the impact of Preston Farm. Refer to graphs over page.



- 4.2.11 We disagree that the existing highway network has adequate capacity to cope with the development of 600 homes in aggregate along a short stretch of the Lower Road, together with an enlarged intake at the Howard of Effingham School. This is reflected also in '*Traffic*' being cited as a concern by over 80% of residents who have made representations concerning Preston Farm. We view the exclusion of school trips as unrealistic, especially when the shortage of school places is considered (again a concern of residents in their representations), meaning that pupils may not be able to attend the nearest school. Once school trips are factored into the mix, the traffic along the Lower Road just east of the main access to Preston Farm, in an area already suffering from congestion, may be projected to increase by *circa* 60%. See Section 12.6 of Appendix 1 of the Bookham Residents Association representation dated 20/3/24.

Section 7 Refer to comments on *ITB8170-017D_Framework_Travel_Plan_Redacted*.

ITB8170-GA-005 Refer to previous comments on same drawing.

ITB8170-Ga-026 Refer to previous comments on same drawing.

ITB8170-GA-006 The main access to the site is too close to the Preston Cross roundabout. Once more than four eastbound cars are queueing at Preston Cross, the exit from the development will be blocked. Westbound vehicles trying to turn right into the development may be prevented from doing so by eastbound traffic or the fifth car queueing from Preston Cross, at which time the westbound queue will build rapidly to block Preston Cross. One must factor into this mix also a high number of cyclists and pedestrians trying to cross the same roads at Preston Cross. Pedestrian and cyclist safety was raised as a concern by over 40% of residents responding to the recent consultation.

ITB8170-021A_Initial_Response_to_SCC_Consultation_Comments

2.1.2 The impact of making the changes sought by SCC will be magnified by the need to update the swept path analysis to reflect the use of larger commercial vehicles along Water Lane to transport mobile homes to/ from the travellers' pitches.

2.1.6 It is fallacious to suggest that there will not be an increase in vehicle movements. Semi-permanent travellers tend to run their businesses from their home so there will be traffic associated with this, which may include commercial vehicles.

2.1.7 The safety of a footway and shared cycle path will be undermined by the risk from larger commercial vehicles. Passing places will need to be much longer than suggested which may require removal of trees and hedgerows.

2.1.18 We question the achievability of this once the larger vehicle sizing is taken into account, as noted in comments on ITB8170-GA-026B.

2.1.19 The cutting back may be much more extensive once the factors noted above are reflected in the swept path analysis. Such removal of vegetation, irrespective of conservation concerns, will increase the risk of flooding in an area that is already prone to flooding.

3.1.1 Refer to previous comments.

Drawings Refer to previous comments on the same drawings.

ITB8170-017D_Framework_Travel_Plan_Redacted

2.2.4 Whilst this is a laudable objective, we must question its realism in a semi-rural environment with poor public transport links, compounded by Thakeham seeking to refute the proposal for limited funding of a demand responsive bus service.

3.2.1 As the shared use footway/ cycleway does not continue all along the Lower Road cyclists are required to re-join or start out on the main carriageway towards Effingham, depending on direction of travel, with consequent risks to road safety.

3.2.3 Widening of Rectory Lane would be challenging for SCC as there is privately owned land 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 that the extension of the footway at the southern end has been shelved.

- 3.3.3 The 479 bus service is currently hourly in the region of Preston Cross and the Howard of Effingham School (based on the latest published timetable), outside of the school peak hours.
- 3.3.5 Whilst Bookham may be the closest railway station, many commuters drive to Effingham or Leatherhead stations on account of the greater frequency of trains. The lack of a more frequent rail service from Bookham and limited parking at Effingham Station was raised by a number of commuting residents in their letters of representation.
- 3.4.4 The table shows simply the walking distances without any factoring for availability of school places or, say, likelihood whether many people will carry shopping 1.2km from the Village Centre. In terms of schools: (i) if families were unsuccessful with entry to the Howard of Effingham School, the state sector secondary alternatives are primarily in Leatherhead, which is not readily walkable; (ii) between 25% - 30% of families in Bookham already send their children to independent schools outside of Bookham, which are mainly in Guildford, Epsom and Cobham areas. Regarding comfortable walking distances, is it realistic to consider a 1.6km walk to a Bowls Club as comfortable when the majority of members are senior or a 1.7km walk to a Golf Club if carrying clubs?
- 3.4.5 The map shows local services and infrastructure without considering whether any of it is over-subscribed. Over 56% of residents responding to the Preston Farm consultation have cited inadequacy of services such as doctor, dentists and school places being a current issue before a further 600 homes are developed with no widespread development of infrastructure to support.
- 3.4.7 Whilst the opportunity to travel other than by car might exist, will it be used in reality? A mother with an infant or an elderly resident is not going to hop on a bicycle to see a doctor over a mile away, especially if the weather is inclement.
- 4.2.1 Refer to previous comments on: (i) pedestrians will in reality cut through Burnhams Road; (ii) the problem with the main access being too close to Preston Cross roundabout; (iii) the inadequacy of the Water Lane access for larger vehicles bringing homes to/ from the travellers' pitches; and (iv) road safety concerns for pedestrians and cyclists exiting Water Lane and crossing the Lower Road..
- 4.3.4 The take-up of electric vehicles will depend also on the availability of re-charging points elsewhere on journeys, which remains a barrier to take-up.
- 5.2.1 Is there not better data than that from 13 years ago and pre-COVID? The choice of this as a baseline may make a 10% change target easier to achieve.
- 5.3.4 Whilst this activity may be funded by Thakeham Homes for the first five years, after that the costs are likely to fall onto residents in a service charge for something they may not want.
- 6.2.3 Is this realistic in a semi-rural environment with poor public transport?
- 6.3.4 If Thakeham Homes is serious about encouraging adult residents to purchase bicycles, then a voucher value of at least 50% of the cost of the bicycle may work rather than less than 10%.
- 6.6.1 A car club with one car allocated to the site will make minimal difference to car travel or ownership. Or even a second, such as suggested under 6.6.4?

Conclusion

We require that i-Transport releases the detailed traffic counts by individual day and location so that it be verified. SCC needs to re-assess the impact of the increased traffic on the Lower Road and environs, based upon the inclusion of:

- School trips, reflecting also that children will not necessarily be going to St. Lawrence Primary School, The Howard of Effingham School, or Manor House School. This needs to also reflect the existing shortage in school places which affects where pupils obtain a place.
- Traffic from users of the Country Park.
- Traffic from users of the Community Facility.
- The likely reality of there being no demand responsive bus service.
- And using the higher trip rate more aligned with the semi-rural location of Bookham and the concomitant rate of car ownership.

If this data is not sufficiently robust, then a further independent assessment needs to be commissioned. The impact of construction traffic needs to be considered also.

D. Savills letter dated 12th April 2024 to Sherrelle Munnis.

Introduction

Thakeham Homes has chosen to respond only to the official consultees, and it would appear have chosen to ignore the valid arguments raised by local residents and 'main societies and parish councils' with much more detailed knowledge of the area, specifically those in relation to traffic flows and impact on Lower Road where the main site access comes out and all the key drainage issues, both surface water and foul drainage.

Designing Out Crime

Thakeham confirms that the level of detail required by the Crime Reduction Advisor and Designing Out Crime Officer in their response dated the 22nd of February 2024, is not known at this stage since this is only an outline planning application. However, the requested details will be addressed and incorporated into any future Reserved Matters planning application, where possible.

In his consultation response, Neil Clarke Crime Reduction Advisor & (DOCO) states "I have reviewed the Design & Access Statement thoroughly and cannot find any references to security or safety measures being proposed for this development. Given the proposed size and nature of the development I would have expected to see some clear references to both physical and design security measures proposed for not only the dwellings but also the wider environment of the site." The BRA agrees with Mr Clarke.

Unsurprisingly, Mr Clarke raises some very important points concerning exterior lighting, the orientation of proposed dwellings, natural surveillance, defensible space, and ongoing maintenance of the site as a whole. For a development site of almost 28 ha to comprise of 200 dwellings, 3 gypsy and traveller pitches, a community building, a car park, footpaths, and a county park, we understand why he expected to see more clear evidence on the proposed security measures before the application goes to the development management committee. The proposed development area is surrounded on most sides by woodland or residential areas which for the most part are dark and unlit. Undoubtedly the security of our neighbourhoods

comes first but Thakeham also needs to strike a balance between keeping the area safe and secure for residents whilst observing the necessary requirements to protect wildlife, natural habitats and ancient woodland from light pollution?

The comment “where possible” appears to imply that Thakeham does not feel it is necessary to observe all the observations of the Crime Reduction Advisor/DPCO. Therefore, it will give the BRA more reassurance if the Council asks Thakeham to provide evidence of its plans before this application proceeds.

Mole Valley Access Group

In her consultation response, the Chair of the Access Group stated: “There is a lack of detail in the outline application.” Thakeham has confirmed that all detailed information relating to accessibility will be addressed suitably in any future Reserved Matters applications.

This is unhelpful but we trust the Council has noted the Access Group’s observations 1-6. We would make particular reference to point 6, concerning access and safety of wheelchair users and partially sighted/blind/elderly users navigating either of the proposed accesses to the development in Lower Road or the SANG. Many of our residents have expressed concerns about safety issues for children and vulnerable groups crossing Lower Road during peak travel times and so far we have seen no evidence that these concerns are being addressed by the Council. The SANG should also be inclusive to all visitors but once again no outline details have been published.

Surrey County Council Archaeology

Thakeham’s acceptance of the proposed planning condition is noted. This must be carried out. As noted in our original Letter of Representation, there are artefacts in this area dating back to Roman times and the late Iron Age.

Thames Water

The response from Thames Water confirms that the application provides insufficient detail to enable them to make a proper response to a matter that they, and we, consider to be an important issue. Problems with sewage backing-up were raised in a number of the letters of representation from residents, as well as an unacceptable rate of raw sewage discharge into the local waterways in times of high rainfall. This suggests that a major upgrade of the network and treatment facilities will be required, not just the connection of the proposed development. There has been no clarity on how the travellers’ pitches will be connected, nor on plans for replacing the existing but inadequate sewer line which runs across the site. We are concerned whether this will be undertaken to the extent required, noting the company’s financial difficulties and potential deficiencies in the mapping of its network.

Affordable Housing Officer

Thakeham does not respond to the Officer’s comments about tenure type. Nor is there any reference to potential service charges that are likely to arise to cover the costs of maintaining common parts, the Community Facility and SANG, which are likely to prove expensive. This was common concern in the representations from residents and could have a disproportional impact on residents in affordable homes, whether purchased or rented.



Nature Space

We are pleased to note that Nature Space is following Natural England's Guidance for Great Crested Newts: advice for making planning decisions. Published 14th January 2022. For further comments see Section A.

Lead Local Flood Authority (LLFA)

Our concerns were raised in detail in Appendix 4 of the Bookham Residents' Association letter of representation dated 20th March 2024 and also under the representation of 19th April, 2024 to the Main Modification, MM34 inter alia.

Historic Environment Officer

The Historic Environment Officer considered that the scheme would result in a low degree of less than substantial harm to the character and appearance of the conservation area but that it needed to be weighed against the provision of housing in Mole Valley. As we have demonstrated in our response dated 19th April to the Main Modifications and the Housing Trajectory ED71A, we believe that the target for the Bookhams can be met through infill plus brownfield development at a rate that has proven to be achievable. In which case there is no requirement to consider causing any harm, since it is not required.

Guildford Borough Council

Guildford's response should be interpreted on the basis that it will rely on MVDC to deal with the application by adopting the usual management considerations.

Environmental Health Officer

Whilst the EHO has comments on there being low noise levels at present, residents in Little Bookham Street and properties near to the development have raised concerns over future levels of noise.

Surrey County Council Countryside Access Officer and Ramblers Association

Again, Thakeham is seeking to defer consideration of this by requesting to submit details at a later date without any clear indication as to what it might involve.

Natural England

Thakeham notes Natural England's comment on 14th March 2024 to the application on the basis of additional information being required in relation to the Suitable Alternative Natural Green Space (SANG). They conclude that Natural England ('NE') does not object in-principle and its holding objection only is wholly commonplace in these circumstances and fully capable of being resolved through dialogue. Furthermore, Thakeham implies that a detailed management plan will take time to evolve and can be secured via conditions and a Section 106 agreement. It expects to continue negotiations via the Discretionary Advice Service (DAS) and has not agreed to a site visit with an officer from Natural England. In the final paragraph Thakeham advise that there have been no discussions at the time of writing with MVDC on the long-term management and maintenance of the SANG. Such potential long-term costs have been a common concern raised by residents in their letters of representation.

The BRA has referred to the consultation response from Natural England and has concluded that Thakeham is misinterpreting the rules. The Senior Adviser from NE has confirmed that the following information is required to determine impacts on designated sites:

- Quantity and quality (in terms of the NE Guidelines) of SANG being brought forward – this requires a full SANG Management Plan and an arranged visit by a Natural England officer through our DAS to ensure the site and SANG plans are suitable and compliant.
- Information on the proposed long-term management, costs and funding of the SANG in perpetuity (i.e. to whom will management ultimately default? Natural England's preferred option would be the Local Planning Authority).
- The NE Senior Adviser also informs MVDC in the consultation response "As this development is proposing a bespoke SANG solution, the site must be visited, and its quality assessed by a Natural England officer prior to it being accepted.

The BRA is rightly concerned that Thakeham has submitted an outline planning application before it has fully researched and complied with the necessary requirements for a SANG, which has not yet been accepted by Natural England. This appears to be a complete oversight on its part and the legislation makes it quite clear that a site visit is necessary. The "Guidelines for Creation of Suitable Alternative Natural Greenspace – August 2021" confirms in Appendix 3: on page 9 para: 4, "*It is essential that NE visits and agrees a SANG, before any housing development can be attributed towards it. This is in line with Policy NRM6 of the South East Plan.*" Also, in Appendix 4, the SANG Information Form requests a management plan. Natural England confirms that compliance with these rules is requested unless there are very special circumstances. The BRA has concluded that there is a great deal of outstanding work to resolve on the SANG and asks that the Council ensures all requirements are met before this planning application is considered any further. The Council has a duty not to allow its progression until all statutory requirements have been met.

Surrey County Council (SCC) Highways

See Section C above.

Sustainability Officer

The Officer submits that Thakeham should be able to meet the 10% from AHSP and solar PV. It is unclear how this will be achieved but in the unlikely event of consent being granted then confirmation of Thakeham's approach on this must be demanded.

Surrey Wildlife Trust

Refer to comment under Section A and also below, combined with The National Trust.

National Trust

The Council needs to ensure that the recommendations of both the National Trust and the Surrey Wildlife Trust are met in order to minimise the risks of the proposed development having an adverse impact on the biodiversity, geological conservation value or integrity of the Bookham Commons Site of Special Scientific Interest (SSSI).

The National Trust wrote in its consultation: "The Trust has reviewed the Ecology Impact Assessment report submitted with the application. Whilst the report notes the existence of

Bookham Commons SSSI within a 2km radius study area it fails to undertake an assessment of the impact of the proposed development on the SSSI. In the Trust's view this is a significant omission from the assessment which should be rectified before the application is determined."

The Surrey Wildlife Trust (SWT) raises the same query on page 2 of its consultation. They advise the Council "We would advise that prior to determination, the LPA request consultation with Natural England on their position on the Mole Gap to Reigate Escarpment SAC and Sites of Special Scientific Interest within the ecological zone of influence.

However, we are disappointed to read that Thakeham does not consider further analysis is necessary in relation to Bookham Commons SSSI." Government Guidance confirms that developers are responsible for finding out if their development is likely to affect a protected area and we can find no evidence of this in the recent reports written by Derek Finnie Associates.

Tree Officer

Refer to Section B above.

Red Line

The area of the SANG appears to be incorrect on some of Thakeham's documents, including the Design & Access Statement which refers to the SANG as being 12.8 ha. The Council advised that it was 10.1ha at the Public Hearing Matter 10, Issue 4. Could the Council clarify which is correct?

We would refer MVDC to the Best Practice Guide and ask them to ensure that paths and surfaces are both suitable and safe for visitors because the area of the proposed SANG is subject to frequent and prolonged flooding and cannot be navigated during the winter.

Further to our belief that there is no requirement for Preston Farm to be developed in the first instance, we oppose strongly the development of the 2.8ha area which is planned to remain within the Green Belt. This has been raised by residents in their letters of representation who believe that the development of this area runs counter to both local policy and Government policy for travellers' pitches.

Conclusion and next steps

Thakeham explains that having reviewed all of the consultation responses they consider that none of them prevent the site coming forward and are capable of being addressed via S106 and reserved matters.

The BRA strongly disagrees with this statement, and we have highlighted the responses of several consultees who concur with us. Importantly and not the least of which:

- There is a great deal of research and planning to complete in order to satisfy Natural England's statutory requirements on the SANG, which could take months.
- There is a lot of work to undertake with SCC Highways.
- Surrey Wildlife Trust have stated that the Environmental Impact Assessment falls a long way short of expectations. We urge the Council to review these issues and request detailed appraisals in line with SWT's recommendations.

Thakeham has requested an extension of time until 31st July 2024 to enable consideration of the planning application once the Local Plan is adopted, or if near to adoption, and they wish to satisfy all issues raised to appropriately determine the application in line with Policy DS8. The recently submitted i-Transport evidence would suggest to the contrary, failing to address previously raised concerns.

We believe that the Planning Application MO/2024/0096 Land North of Lower Road and West of Little Bookham Street does **not** fulfil the requirements of Local Plan Policy DS8 Land North West of Preston Farm Bookham.

We explained at length in our earlier representations that Inspector Barrett did not agree to Thakeham's request for a Main Modification to build a Community Building, three Gypsy & Travellers pitches or dwellings in the 2ha of land which is remaining in the Green Belt on the policies map. This would be inappropriate development on the Green Belt.

We disagree that it is premature of MVDC to seek a withdrawal or refusal of this application. To the contrary, it is Thakeham Homes who has sought to submit an application prematurely and with insufficient attention to detail in the hope that all matters, with the exception of access, could be reserved, including the SANG.

For the reasons mentioned above, a time extension would serve no purpose and the planning application should be refused.

E. Letters of Representation submitted by residents of Bookham.

We have also reviewed other Letters of Representation submitted by residents of Bookham. There have been over 200 such letters from Bookham's residents objecting to this application. Over half have raised concerns about the following matters:

- Loss of Green Belt.
- Traffic Generation.
- Over development of housing.
- Existing insufficiency of medical facilities and infrastructure.
- Flooding & surface water issues.

Many have also expressed concerns about ecology, merging of villages, school provision and road/pedestrian safety.



These points were all covered within our initial Letter of Representation, but a significant number of concerns about building heights have been raised by residents living along Little Bookham Street and Fox Lane. This plan has been copied from the planning application documents and indicates the length of run of taller buildings. The lowest block below is 2-storey (yellow), then 2.5 storey (orange) and finally 3-storey (pink). So, 24 properties on LBS would back onto 2.5-storey or higher. And even those in the orange block in middle are "limited 3-storey on key corners". We agree with this concern in that the height of the proposed dwellings could well impinge on privacy and the outlook from the residents along Little Bookham Street and Fox Lane.

Overall Conclusions

In conclusion we have found nothing within the amendments submitted that changes our view that this application should be refused. We can see no need for a decision to refuse consent cannot be made soon bearing in mind the considerable number of credible objections from local residents as well as from local societies and an adjacent Parish Council.

All the evidence is made by consultants employed by Thakeham which can be seen as a conflict of interest, and it is likely to be refuted by external consultants. In light of the vast number of objections we request that the decision to refuse consent is made as soon as is possible.

Furthermore, we are convinced that there is no need to develop this site to meet the proposed housing allocation target of 255 houses by 2039 in Bookham. Having regard to a history of infill developments, it is logical and entirely credible to accept that such developments will continue into the future, together with the likelihood of new brownfield sites becoming available, often being in locations suitable for affordable housing.

As an illustration of this in the 4-week period between 15th March and 12th April there were applications submitted for 11 new dwellings in Bookham. Indeed, in the year to date to 12th April 2024 there have been applications for 20 net new dwellings, which is over 75% of the average annual total for 2024 – 2039 sought under the Trajectory for Housing ED71A. The table below demonstrates that the development of Preston Farm is not required for MVDC to meet its target within the proposed Housing Trajectory.

Allocations to Specific Sites	Equates to DS8, 9,11	212
Permissions Granted	These were granted before 22/6/22 so would not count as new approvals for 2024-39	Excl.
Completed	Exclude as they were completed in/ by 2022	Excl.
Small site windfall	Table 2* total of 110 across 13 years plus further 2 years pro-rata	127
Development Opp Areas	Unchanged as they are within previously defined boundaries	59
Total for Period 2024 - 2039		398
Average per annum over 2024 - 2039		26.5
<i>Cf. 2022 – 2023 average</i>		24
<i>Cf. 2022 rate</i>		26

Preston Farm is neither required to meet housing targets under ED71A nor is not wanted by the residents of Bookham.



I request acknowledgement of receipt of this letter.

Yours faithfully

A handwritten signature in black ink, reading 'Keith Whale'. The signature is written in a cursive style with a prominent underline.

K Whale BSc FRICS
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.