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2 November 2021

Planning Policy,
Mole Valley District Council,
Pippabrook,
Dorking,
Surrey,
RH4 1SJ

Dear Sir/Madam,

**Future Mole Valley
Draft Mole Valley Local Plan 2020 – 2037
Proposed Submission Version (Regulation 19)**

Effingham Parish Council (EPC) welcomes the opportunity to respond to the Future Mole Valley Local Plan, Regulation 19 (The Plan).

EPC has a number of concerns with the Regulation 19 version basically the same concerns that it has had all through the Mole Valley Local Plan process with over-development in the Lower Road area, school provision, health provision and whether or not Mole Valley DC have liaised with GBC especially regarding the over-development on the Effingham Bookham border.

Policy DS8: Land Northwest of Preston Farm, Bookham (Page 128)

POLICY DS8: LAND NORTH WEST OF PRESTON FARM, BOOKHAM Allocated for: RESIDENTIAL, COMMUNITY (including Early Years Education) AND COUNTRY PARK Site Area (ha): 27.4ha total, approx. 10ha developable Indicative capacity: 200 dwellings, at least 3 gypsy and traveller pitches.

Jon Short ~ Clerk
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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
This policy allocates this 27.4ha area for 200 dwellings in an area of former Green Belt (part) and continuing Green Belt (part).

EPC has serious concerns about Policy DS8. This policy, and the site allocation, is on the border of Little Bookham and Effingham. It does not take account the existing planning permissions, and two new planning applications, affecting land only a few hundred metres away in Lower Road, Effingham, just across the village boundary in the Guildford Borough Council (GBC) area.

An existing planning permission awarded to Berkeley Homes (BH), allowed on appeal in 2018 by the Secretary of State, allows BH to build a new Howard of Effingham School on green belt land off Lower Road next to Effingham's border with Little Bookham, with enabling permission for 295 additional dwellings in Effingham. The new school will take 2000 pupils: a 25% increase, equivalent to two forms of entry.

In addition to this planning permission BH has recently submitted two additional planning applications to GBC (21/P/01283 and 21/P/01306) for an additional 114 homes in the same Lower Road area. A total now in Effingham of 409 new dwellings of which 372 will be on Lower Road with the new school.

Policy DS8, the site selection of Preston Farm for development, will close the green belt gap between Effingham and Little Bookham in the Lower Road area. The two villages will run into each other, which is contrary to the NPPF at paragraphs 137 and 138.

The development of Preston farm will put considerable pressure on local road infrastructure, especially along the section of Lower Road from Preston Farm to The Street in Effingham, a distance of almost one mile. The 200 extra homes if allowed at Preston Farm will result in an over-development of this part of the Lower Road area, significantly increase traffic and with the potential to create a road safety risk for the circa 2700 children commuting to and from the three schools in this small area: The Howard of Effingham, St Lawrence Primary and the nearby Manor House School.

Further DS8 is being proposed within a critical drainage area, and the Policy should be strengthened to ensure all types of drainage are adequately assessed before the Plan and policy DS8 are agreed. The capacity of the sewage system in Little Bookham is already under severe strain. If the new Howard of Effingham School and over 400 extra houses in Effingham, along Lower Road, are built, they will be using this same drainage and sewage systems as Preston Farm. The Lower Road, Water Lane and Preston Farm areas are problematic areas for drainage, of both surface and foul water, and there is a risk of flooding. The Plan should mention in these risks.

Secondary School provision

Secondary education is hardly mentioned in The Plan. EPC can find no reference as to how the secondary education needs of any new Bookham housing will be met. Even if the enlarged Howard School is built, there will be significant competition for places from new developments in Guildford Borough, already allocated under Guildford's Local Plan.

At present, a significant number of Bookham children attend the Howard of Effingham School. The Guildford Local Plan allocates land in the catchment area of the Howard for over 1000 new homes on smaller non-strategic sites in the east of Guildford Borough, which will severely increase the competition for places at the Howard School within the next few years. This does not include the prospective development of about 2200 new homes at the former Wisley Airfield. Although it is possible a new secondary school will be provided at the former Wisley Airfield, it will be many years before it become available, if it ever does

Planning permission has been granted for the Howard of Effingham School to be rebuilt with 400 additional pupil places, equivalent to two additional forms of entry. This development has not yet started, and the land for the new school at Effingham Lodge Farm remains green belt under the Guildford Local Plan. If and when the new Howard School is built, the new enabling housing developments in Effingham itself, plus the new developments in the nearby Guildford Borough areas from site selections in the Guildford Local Plan, are likely to consume most, if not all, of these extra places.

Effingham Parish Council believes that the omission of a Policy to ensure adequate secondary school provision for the Bookham and Fetcham area is a significant failure in The Plan.

Health provision

The absence of any specific proposals for addition GP surgeries, or expansion of existing surgeries, is a significant concern, given that the two Bookham surgeries are at full capacity even now. Effingham has no surgery of its own, and around 50% of Effingham residents attend the two Bookham GP practices (others use the East Horsley surgery.) Further surgery development should be considered in the Plan to cater for the demand from the extra housing proposed.

Liaison with Guildford Borough Council

EPC was expecting to see some understanding of the existing housing and school development situation in the cross-border area, between Bookham and Effingham, in The Plan. We are disappointed to see that The Plan does not recognise the cross-border infrastructure situation, drainage, health and school provision.

If we add up the total number of dwellings proposed for the Lower Road areas of Little Bookham and Effingham they add up to over 600 in total plus a 2000 pupil school. That

represents an over-development of this small area. The Lower Road would be significantly over-developed if Policy DS8 were allowed.

EPC believes that The Plan fails to take proper account of cross-border issues including the amount of development in the Horsleys already allocated in Guildford's Local Plan and can only conclude that insufficient liaison has taken place between GBC and MVDC over The Plan.

Summary

In summary EPC has serious concerns about some aspects of the Plan and requests that the following measures should be taken:

- a. Review the draft Plan to reduce the housing to a sustainable level in the Little Bookham area, and to take account of developments already included in Guildford's Local Plan. This includes removing the housing allocation at Preston Farm (Policy DS8) and keeping that area within the green belt, to avoid destroying the green belt gap between Effingham and Little Bookham.
- b. Put adequate plans in place to ensure sufficient provision of secondary education in Bookham and Fetcham; if necessary, allocate land in Mole Valley for a new school to serve this area.
- c. Review the infrastructure provision in this area, particularly roads, health, drainage and sewerage, and ensure adequate improvements are made before significant housing developments along Lower Road are allowed.
- d. EPC is concerned that Mole Valley District Council (MVDC) has not fully liaised with GBC on the cross-border planning issues before producing Policy DS8. EPC seeks assurances from MVDC that they have seriously discussed issues a – c above with GBC before submitting The Plan to Regulation 19 evaluation.

Yours faithfully,



Ian Symes
Chairman, Effingham Parish Council