



Planning Policy,  
MVDC,  
Pippbrook,  
Reigate Road,  
Dorking,  
RH4 1SJ

22<sup>nd</sup> March 2020

Dear Sir or Madam

### **Response to Consultation on Draft Local Plan**

Effingham Residents Association (EFFRA) is writing to comment on the draft Local Plan of Mole Valley District Council. Effingham is in the Borough of Guildford but it borders Mole Valley and will be significantly affected by the Plan proposals.

#### ***Policy S2***

We strongly object to ***Policy S2*** which redraws the Green Belt boundary to allow housing at Ashted, Leatherhead, Fetcham and Bookham. Very special circumstances have not been demonstrated to justify the proposed changed boundary. Mole Valley has land outside the Green Belt, with good transport links that could be used for housing. We also do not feel that all brownfield options have been exhausted before proposing to build on Green Belt.

#### ***Site Allocations SA09 to SA11***

We would like to particularly comment on Site Allocations ***SA09 to 11*** on pages 104 to 109.

EFFRA is very disappointed that Mole Valley is proposing to build near to the Effingham boundary. EFFRA understood that there was an agreement between Guildford Borough Council (GBC) and Mole Valley Council not to propose developments close to the boundary in their respective Local Plans. This was not only to retain a clear boundary of green space between the two authorities and villages, but also because it was recognised that the infrastructure of this area was already under great strain. This includes narrow congested roads, out of date drainage and sewerage systems, over full medical and dental practices and over-burdened schools, which it was impossible to satisfactorily rectify and upgrade and which extra dwellings would seriously exacerbate.

GBC honoured this agreement in their Local Plan allocations but the Secretary of State ruled that the building of a new enlarged secondary school (the Howard of Effingham School on Effingham Lodge Farm) merited special circumstances which required the building of an enabling development of 295 dwellings close to the boundary. This school will serve pupils from the GBC area and also Great and Little Bookham and will therefore benefit Mole Valley. We believe that Mole Valley should take in account this agreed development on the boundary with Guildford and the developments in Guildford's adopted Local Plan.

EFFRA believes that proposing 800 dwellings in Great and Little Bookham with many of these close to the Effingham boundary is not only in breach of this agreement, but is a further over-development of the area. It will seriously exacerbate the infrastructure problems already facing the area to which the Howard School/Berkeley Homes development will add. We attach an image of the area showing the agreed developments in Effingham and those proposed in Little and Great Bookham which clearly shows the proximity of these developments. The following infrastructure and other issues will result from these allocations.

- Serious and dangerous worsening of the narrow and congested road system, particularly in relation to **SA09** Preston Farm (see below). It is clear that the traffic implications of these developments have not been adequately assessed contrary to the statement in the Strategic Highways Assessment. We believe that a full traffic modelling study would be required to properly assess these as we believe that these developments would result in a serious increase in road traffic accidents including injuries to pedestrians and cyclists.
- Serious under provision of primary and secondary school capacity as a result of the approximately 800 Bookham extra dwellings in addition to those in the Guildford Local Plan for Horsley and Effingham and the extra 295 from the Secretary of State's decision. If such a number of dwellings in Great and Little Bookham is to be allowed then schools need to be built or extended in Mole Valley to provide the places (**Policy INF3**).
- Further pressure on the already heavily overloaded primary health care facilities, which already have unacceptable waits for appointments. If this number of dwellings is to be allowed the Plan should contain provision for building or extending health care facilities.
- A net biodiversity loss will result from these developments. This is not in compliance with Government Policy and is contrary to the Draft Plan Policy EN9 – Enhancing Biodiversity. This area sits between the SSSI sites of Ranmore Common in the south and Bookham Common in the north and is important for linking the wildlife and helping maintain biodiversity in these fragile ecological habitats. Because of the amount of development in recent years it is important that the few areas of open land remaining between these SSSIs are protected from development. Sites **SA09** and **SA10** are important remaining open areas and **SA11** is part of a designated wildlife corridor in the adopted Effingham Neighbourhood Plan (see below).

Below we give our additional particular comments for each individual site.

**SA09: LAND NORTH WEST OF PRESTON FARM, BOOKHAM** - 250 dwellings and two gypsy and traveller pitches – site access from Lower Road just west of Preston Cross roundabout

- Unacceptable closing of the gap between Little Bookham and Effingham contrary to the NPPF and local residents' wishes, particularly as the new Berkeley Homes school and housing development allowed because of very special circumstances will come up to the district boundary. The Green Belt land proposed for development is valued as it is visible from public footpaths contrary to the statement in the Draft Plan discussion.
- Site **SA09** is in very close proximity to the newly approved 2000 pupil Howard of Effingham School and 159 houses and a further (outline approved) 99 houses. The resultant level of traffic will cause undue congestion on the road, particularly at peak times. It will be a safety risk to pedestrians and cyclists on a road that is used by many school children going to and from the Howard School by bicycle or by foot from their homes in Great and Little Bookham. The location of the exit from this development for 500+ vehicles just 50 metres from the small Preston Cross junction and opposite a 70 bed care home is particularly dangerous. As mentioned above, a full traffic modelling study is needed.
- The local sewage network is old and degraded in various areas and currently it is proposed that the new school sewage enters this system to the east. With the new site using the same routing across Preston Farm and thence into Little Bookham Street, blockages are certain to occur even more frequently. Any extension of housing numbers should contain provision for replacement and upgrading of the sewage network (**Policy INF4**).
- The site has a history of surface water flooding and overload in the drainage system downstream as has the Effingham Lodge Farm site. This section of Lower Road has a history of flooding. We believe flood risk will not be able to be managed as required by **Policy INF2** without significant investment.
- This site is adjacent to the Conservation Area of Little Bookham and near to Effingham Conservation Area. Adding this number of dwellings will urbanise Little Bookham Conservation Area, causing serious harm to it.
- If this development is permitted, we support the retention of the ponds and the provision of a country park. However, we are concerned about both how this would be managed and that it should be managed for wildlife to be compliant with policy **EN9**, with pet dogs forbidden or only allowed on leads because of the wildlife ponds.

**SA10: LAND NORTH OF GUILDFORD ROAD, BOOKHAM** - 164 dwellings and two gypsy and traveller pitches – site access from A246 to the west of Hawkwood Rise

- **SA10** will be accessed from the A246 and the resultant extra traffic will cause congestion on an already busy road.
- Building on this Green Belt site would reduce the rural feel of the area. We understand that the proposed western boundary is not a defensible Green Belt boundary. This is of particular concern as the developers also own the land to the west and have publicly stated their intention to extend the site west to Rectory Lane. This would destroy the rural feel of the area and close up the historic boundary and green gap between Little Bookham and Great Bookham contrary to the NPPF.

- As with Site **SA09**, foul drainage from **SA10** will join the line down Little Bookham Street, a system that already suffers from well documented issues.

**SA11: LAND AT CHALKPIT LANE, GUILDFORD ROAD, BOOKHAM – 11**  
dwellings – site access from A246

- **SA11** will be accessed from the A246 and the resultant extra traffic will cause congestion on an already busy road, close to the junction with Rectory Lane which will itself be much busier with the Effingham developments on Lower Road and Preston Farm if it is approved as a site allocation
- This site forms part of a designated wildlife corridor in the adopted Effingham Neighbourhood Plan (*Policy ENP-ENV2*). A wildlife corridor links the SSSIs of Ranmore Common and Bookham Commons via the hedges and woods. The proposed development of 11 dwellings at site **SA11** would have serious consequences for this wildlife corridor, as it would create a barrier, preventing or seriously restricting movement of wildlife across the A246 from Chalkpit Lane. We urge Mole Valley to include this wildlife corridor within their Local Plan to provide protection for wildlife.

We understand that local residents on the Great and Little Bookham side of the boundary have similar concerns to ours and trust that Mole Valley District Council will listen to these concerns and remove these damaging site allocations.

Yours faithfully

DJ King  
Hon. Secretary