



Planning Enquiries
Planning Department
Guildford Borough Council
Millmead House, Millmead
GUILDFORD GU2 4BB

31st July 2026

Dear Sir or Madam

26/S/00002 Request for an EIA Scoping Opinion under Regulation 6 of the Town & Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended).

Land North of Lower Road, Effingham

Effingham Residents Association (EFFRA) is writing to respond to the consultation on Berkeley Homes request for an EIA Scoping Opinion to which it objects.

EFFRA is extremely disappointed that Berkeley Homes is proposing to apply to build 600 residential homes on its land at Effingham Lodge Farm, after withdrawing from the agreed scheme to provide a secondary school on that land in return for enabling development. At the public webinar on 16th July Berkeley Homes' representatives confirmed that they would submit the application on a claiming the land is grey belt and that the application would "build on the previous scheme".

EFFRA disputes the land in question is grey belt and points out that:

- Berkeley Homes is required to legally prove the grey belt status for the whole site. Grey belt status does not in any case give an automatic right to build on land.
- As the previous scheme was only agreed because of the very special circumstances of the public benefit of providing a new school the previous scheme agreed is not applicable to any new application without such benefit. Berkeley Homes should be required to start its application for building on this land from the beginning and not be allowed to rely on any part of or studies for the previous scheme. Because of the duration of the previous applications much of this work is now out of date with circumstances and many conditions have changed making previous studies associated with that scheme irrelevant.
- The number of homes proposed at up to 600 is a large increase on the previously agreed 405 on three different sites and will be concentrated in a smaller area. It would cause greater harm than the previous scheme with no public benefit.
- The increase would also be a major expansion of the village (an approximate 57% increase) contrary to the Local Plan where Effingham was identified as a village unsuitable for major expansion.

EFFRA contends that as the Environmental Impact Assessment (EIA) Statement is for a major, new proposal on a known sensitive site, it needs to be a thorough evaluation of the potential environmental risks of the proposed project. It would be wrong to scope out major topics as Berkeley Homes is proposing and EFFRA objects in particular to the scoping out of:

- 1 **Green Belt assessment** and dealing with it “separately” via the LVIA as the harm to the Green Belt is the most important issue of this proposal. The impact on the setting of the close by Effingham and Little Bookham Conservation Areas should also be fully assessed.
- 2 **Ground Conditions and Contamination and Risk of Major Accidents and/or Disasters.** Positive findings of levels of asbestos in tested soil at 1 in 5 (4 of 20 test pits) are revealed in the documents submitted. Local residents have reported this site was subject to illegal dumping of materials and waste for a number of years after it was no longer used for agriculture. In particular, asbestos waste was said to be buried in trenches on the site. The tests carried out by the owner have confirmed its presence in one area and similar testing needs to be extended to the whole site as part of the Environmental Impact Assessment before there is any disturbance to land on the site because of the risk to human health. This site is close to four schools (Manor House School is not listed in Table 2) and residential dwellings and leaving such a risk is unacceptable. Similarly, the impact of construction noise and dust and the effect on air quality needs to be assessed at the pre application stage with schools and residential homes close by.
- 3 **Light Pollution.** It is incorrect to state that “the effect of artificial light pollution depends on the design of proposed light installations” para 5.18. This site is next to Ancient Woodland and situated in a village with a Dark Skies policy as part of its Neighbourhood Plan (ENP-ENV4). The applicant appears unaware of this as it is incorrectly stated in para 4.24 that there is street lighting on the north side of Lower Road ..towards Effingham Village”. Any artificial light on this site will have an impact and this needs to be covered in the EIA.

EFFRA is particularly concerned by the proposed minimal scoping proposed on the Ancient Woodlands bounding the site in the north. As the Government Guidelines from Natural England points out ancient woodland is irreplaceable and the impact of any proposed development close to it needs to be fully assessed prior to determination. It should not be treated as a condition as it may affect the determination of the site. The assessment should include the impact of any soil disturbance, increased sound, light and change to the water table – the latter being particularly relevant to this site. Natural England requirements include mandatory buffer zones of a minimum width of 15 metres, depending on the scale of development and other factors. The buffer zones are required to be left semi natural, including natural shrubs and scrub to dilute the wind. Humans and domestic animals are supposed to be largely excluded from the buffers to avoid compaction of the soil affecting tree roots and impact on wildlife and fauna. EFFRA is therefore disturbed by Berkeley Homes’ stated intention in its masterplans published at its webinar, to use the recommended buffer zone between the development and the Ancient Woodland as counting towards open green space and for it to be used for recreation with walking/cycling/dog walking routes marked on it. Berkeley Homes has also excluded an area of ancient woodland it owns on the north west boundary of the defined site which means it could not be conditioned if a scheme was approved and therefore this area should be included in the site boundaries.

EFFRA is very concerned about surface water and flood risk on this site and does not believe its assessment is adequately covered. Surface water flooding from this site to both the east and west has increased since the first application was submitted for the site. Site drains and an attenuation

pond were built under the previous permission but some appear to have been filled in. With climate change the surface water and flood risks on neighbouring roads and buildings need to be fully assessed in the EIA together with the likely impact on the neighbouring Ancient Woodland.

EFFRA is also concerned that the cumulative impact of this scheme with other local developments should be fully assessed and an artificial 2km boundary should not be accepted as this excludes places in the AONB such as Polesden Lacey that have views over this site and nearby developments as at Wisley.

EFFRA is also concerned about the quality of the EIA Scoping Opinion Request submitted by Berkeley Homes' agents because of the number of errors and omissions in it. This gives us little confidence in its conclusions and recommendations. Example of errors include an incorrect public water supplier being quoted (Thames Water instead of SES), incorrect public footpath numbering, incorrect details of public transportation, incomplete inclusion of local roads and schools, street lighting assertion above and exclusion of Liberham Lodge and The Grange as homes of vulnerable residents.

EFFRA asks GBC to require that a full EIA is carried out and that Berkeley Homes is not given permission to scope out the topics it has requested and to which EFFRA has objected above.

Yours faithfully for EFFRA

Vivien White, Chairman