Effingham Residents Association

Objection to outline planning application 26/P/01289

26/P/01289 Land North of Lower Road, Effingham
Outline Application (with all matters reserved except for points of access to the highway) for residential development (Use Class C3), a nursery (Use Class E(f)), together with landscaping and associated works (following demolition of existing structures)

Effingham Residents Association (EFFRA) strongly objects to this outline planning application.

This application seeks outline planning permission for up to 600 dwellings on 23.78 hectares of land on Effingham Lodge Farm (ELF) which is located close to the historic centre of Effingham. There are currently around 1,000 dwellings and this proposal would represent a 60% increase.

EFFRA objects to the proposal as inappropriate development in the Green Belt that conflicts with the National Planning Policy Framework (NPPF). We maintain that the site does not qualify as grey belt land and lacks the "very special circumstances" required to justify building here. Furthermore, even if the site were classed as grey belt, it is not a sustainable location as it relies heavily on transport by car and fails to satisfy the requirements of NPPF Policy GB7(g) and the Golden Rules under NPPF Policy GB8, as detailed in our full objection.

Additionally, we object to the proposal on the following grounds:

- Scale, Density and Design: The development is inappropriate in its scale, density, and urban design.
- Landscape: It will negatively impact the local landscape and village character.
- Heritage: It will cause harm to nearby heritage assets especially the Effingham Conservation Area.
- Transport: It will place an unsustainable strain on local roads and transport infrastructure.
- Access Arrangements and Highway Safety: The proposed principal vehicular access from Lower Road opposite the Howard School is a serious safety concern.
- Flood Risk: It presents an unacceptable and unmitigated risk of groundwater and surface water flooding.
- Open Space: It provides an inadequate amount of open space.
- Local Services: It will negatively impact local education, community, and recreational facilities, with no contribution to improve them included in the application.
- Ecology: It will harm local wildlife and ecology, particularly the rare ancient woodland it borders.
- Asbestos contamination: asbestos has been found in soil samples on the site but the full extent of the contamination remains unknown. A full survey of potential contamination should be undertaken prior to any planning consent being considered and cannot be left to planning conditions.

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Background of Effingham and the Proposed Development

Effingham is a small rural village built around an historic core protected as a Conservation Area and which the former farmland (ELF) in the application adjoins. This land also separates Effingham from the equally historic village of Little Bookham, which forms the western edge of the wider urban area extending from Fetcham to Bookham.

Most of Effingham's working residents commute to London or the neighbouring towns of Guildford and Leatherhead. Travel is heavily car dependent, as the local bus service is very limited. Accessing the rail service from Effingham and Bookham stations also requires car journeys (and parking) for most residents. The village experiences significant traffic congestion due to its narrow historic roads. These are heavily used by vehicles travelling and because it acts as one of the few routes to the north via Effingham Common Road. These vehicles either come from the Bookham/Fetcham area via Lower Road where the land subject to this application is situated or from villages in the Surrey Hills to the south via The Street. This congestion is significantly worsened by school traffic because Effingham has two schools on Lower Road, and two nearby independent schools - St Teresas to the south and Manor House School in Little Bookham some 260 metres away from the land in question.

The Howard of Effingham School is situated opposite the application site and was to be rebuilt by the applicant as part of the approved planning permission it withdrew from in March 2026. The school is well regarded and is operating at full capacity. Its buildings are generally in poor condition and were described by the applicant as "not fit for purpose". Pupils reach the school by a variety of methods; many walk from Effingham and Bookham along streets with either narrow or no pavements; some cycle on the busy roads; other children use school buses – such large vehicles causing further congestion; parents drop off their children with resultant traffic chaos and many of the sixth formers have their own cars which are generally parked opposite the school and prevent a two way traffic flow on Lower Road

Effingham has few local facilities. It has a small parade of five shops, a pub, café and garden centre but no medical facilities or dentist. No recreation facilities are provided or funded by the Borough Council. A local charity, the Effingham Village Recreation Trust run by volunteers, manages 12.5 hectares of land given to the village by a group of residents that included Sir Barnes Wallis. There are playgrounds, rugby and football pitches, a 3G sports pitch and a rundown hall in a building that also houses a nursery and rugby club. Car parking is restricted on the site as it is in the Conservation Area. The former planning development (now abandoned by Berkeley Homes) would have provided funding for a new hall through the S106 money.

EFFRA believes that building 600 homes on this former farmland would put an unbearable strain on the already congested roads, schools and recreational facilities. This strain cannot be mitigated because of the historic constraints and it is downplayed in the applicants' documents. All independent reports commissioned by Guildford Borough Council have agreed that Effingham is a village unsuitable for major expansion particularly on its northern side i.e. where this site is. The previous permissions obtained by the applicant for this site had a maximum of 273 dwellings plus the school building – the latter being the only reason the development was allowed as a "very special circumstance".

The Applicant and the History of the Site

The applicant, Berkeley Homes, has a twelve year planning history on this land which it inappropriately attempts to rely on in this application. The earlier planning permissions were granted even though the proposed development was inappropriate development in the Green Belt and the village was overwhelmingly against it. The offer of building a replacement Howard of Effingham School was agreed to be "Very Special Circumstances" that exceptionally allowed enabling housing for the school to be built. This did

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not establish a principle of residential development on this Green Belt land. After twelve long years of numerous planning applications, Berkeley Homes withdrew from building the school in March 2026 when the approved applications then became void.

EFFRA believes that the behaviour of Berkeley Homes, (a public company) during these twelve years has fallen well short of the standard that local residents were entitled to expect and has caused long term distress and worry for many Effingham residents. Berkeley Homes had confirmed to the Inspector in June 2017 that the scheme was financially viable but after gaining its first approval at Appeal in 2018, the company sought to build more housing, to change the conditions imposed upon it and to build a smaller school with a lower specification, claiming that the scheme was no longer financially viable.

Details of the main applications can be found at Appendix 1.

Since buying the farmland in 2013, the company has allowed it to become unkempt and overgrown. Prior to its acquisition by Berkeley Homes, the land had been used for grazing animals and had a horticultural business on the southern part of the land. In 2017 trees were removed from the grass verge adjoining Lower Road in supposed readiness for a cycle way. This reduced its rural feel, but no cycle way was ever built. Ugly heras fencing was erected around the site. The horticultural buildings were removed and features forming the field boundaries removed. Concrete blocks close off the entrance on Lower Road and a half finished road and ugly fencing scars the site entrance on Effingham Common Road.

Many local residents have been distressed by the behaviour of Berkeley Homes. This company which has treated our community so poorly over the last 12 years and which the village finds completely untrustworthy is now proposing to put the village through another 12 years of noise, disruption and uncertainty to build this excessively large development in an inappropriate location. EFFRA believes that Berkeley Homes should not be rewarded for reneging on its promise to build a new school and its poor behaviour over the last 12 years.

EFFRA's Reasons for Strong Objection

EFFRA believes that this harmful outline planning application should be refused under national and local planning policy for the reasons set out below. We also believe that the supporting documents to this application are unbalanced and do not represent a true picture of the harm that would be caused by this development.

1. Primary Reason for Objection: Inappropriate development in the Green Belt

The land is not Grey Belt

The applicant is basing its application on the grounds that the land is grey belt. EFFRA does not believe that the land is grey belt and does not believe the applicant has adequately demonstrated that it is.

Effingham Lodge Farm, the application site, is agricultural land and forms a crucial green buffer that maintains the open, agricultural character of the countryside and provides a clear physical and visual separation between the built settlement of Effingham village and its rural surroundings. It also prevents coalescence with the neighbouring communities to the east.

Grey belt land is defined by the NPPF as Green Belt land that does not strongly contribute to the purposes of A, B or D on Policy GB2. This land contributes strongly to purpose A as it 'checks the unrestricted sprawl of the large built-up area of Bookham/Fetcham. The land has been recognized in all previous Guildford local plan studies as protecting the Effingham-Bookham gap i.e. ensuring a gap remains between the village of

Effingham and Little Bookham at the end of the large built-up area. We contend that if built on this land would result in an "incongruous pattern of development" as an "extended 'finger' of development into the Green Belt" contrary to Annex E.3 of the NPPF.

EFFRA also believes that building on this land would adversely affect the openness of the remaining Green Belt particularly across the boundary with the neighbouring Mole Valley district. This aspect has not been adequately addressed by the applicant.

The applicant is relying on the August 2026 Green Belt Assessment produced by AECOM for Guildford Borough Council which suggests the land as grey belt due to it making insufficient contribution to purposes A, B and D of Policy GB2 of the National Planning Policy Framework (NPPF). However, we understand that Guildford Borough Council's Director of Planning has assured Effingham Parish Council that the AECOM report is "*an evidence base document and will be a starting point only for decision taking regarding sites that may be grey belt".* In our view the applicant has not demonstrated that the land is grey belt.

If the land is not grey belt, then development on it will be inappropriate development in the Green Belt unless it meets one of the exceptions in NPPF GB7 or there are very special circumstances to allow it. The building of a replacement secondary school was allowed as a very special circumstance in the applicant's previous applications, but no new school is included in this application. The provision of housing both market and affordable is in our view not sufficient to outweigh the harm this development would cause (see housing section below).

NPPF Policy GB7 and the Golden Rules are not met

If the land was to be classified as grey belt, the proposed development must meet all the requirements in NPPF Policy GB7g and the Golden Rules in NPPF GB8. EFFRA does not believe it does so.

With regard to NPPF Policy GB7g EFFRA believes it does not meet all the four requirements of NPPF Policy GB7g which have to be met per below:

I. **The development would utilise grey belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan**
Instead, the development would "fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan" as this land is on a boundary between two local authorities and the Green Belt does not recognize local council's boundaries. As noted above, this land has an important role in keeping the Green Belt open across the boundary with the neighbouring Mole Valley district.

II. **There is an evidenced unmet need for the type of development proposed**
Whilst Guildford Borough Council has unmet housing need, there is no evidenced need in the eastern part of the borough where this land is located. Indeed, recent developments and those forecast forward show a surplus in this part of the borough. For a village on the border like Effingham the situation in the neighbouring local authority is relevant. The neighbouring local authority, Mole Valley Borough Council, had a land supply surplus at 13 August 2026 with a 5.3 year's land supply. Similarly, a large supply of affordable homes in this rural location is not needed. Thus, there is not evidenced need for the type of development proposed.
We also have concerns over the actual delivery of the scheme based on the previous behaviour of the applicant.

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III. **The development would be in a sustainable location, with particular reference to policy TR3 of this Framework.**

The development is not in a sustainable location and does not meet the requirements of TR3 which says “the location should limit the need to travel, particularly by private car, and offer a genuine choice of transport modes for residents and users”. The location plainly fails this test. As recognised by the applicant, the village has few employment opportunities or local services and has poor transport links. The primary mode of travel in the village is by car, and the applicant recognizes that this would also apply to the development.

There are two train stations in neighbouring settlements. Effingham Junction is approximately 1.2 miles from the nearest site access to it and Bookham Station similarly 1.3 miles from its nearest site access. As Bookham Station offers only an hourly service Effingham Junction is mainly used by commuters. The applicant places particular emphasis on active travel infrastructure and assumes that a meaningful proportion of residents will choose to cycle to Effingham Junction Station. However, the proposed improvements do not appear to provide a continuous segregated cycling route between the development and Effingham Junction Station. The applicant's own assessment acknowledges that sections of the route present physical constraints and that opportunities to widen footways are limited, meaning cyclists will continue to share the carriageway with general traffic along parts of the route. This is materially different from providing a dedicated cycle corridor and is unlikely to encourage widespread use by families, older residents or less confident cyclists. As a result, the forecast level of modal shift away from private car use appears optimistic and insufficiently evidenced.

The reality experienced by local residents is that access to the station is heavily dependent on the private car. Unlike many commuter settlements, Effingham Junction Station is not located within the village centre and serves a wide rural catchment extending beyond Effingham itself. Consequently, a significant proportion of existing users already drive to the station. This reflects the limitations of the local bus network, the dispersed pattern of surrounding residential areas and the practical difficulties associated with walking and cycling along local roads. The station therefore functions as a park-and-ride facility for many residents rather than a destination that can be conveniently reached by active travel.

This existing dependence on car travel has already resulted in pressure on parking and access infrastructure at the station. Additional housing growth would not simply increase rail use but would also increase demand for station parking, drop-off facilities and the surrounding road network. The Assessment fails to demonstrate how this additional demand would be accommodated in practice or whether sufficient capacity exists to absorb growth arising from the development. During peak commuter times, the car park already runs at effectively full or over capacity.

Furthermore, the assessment does not adequately consider cumulative impacts arising from other significant housing developments within the wider area. Effingham Junction Station will not only serve residents of the proposed 600-dwelling development but will also be relied upon by residents of other major schemes, including the former Wisley Airfield development. The combined effect of multiple developments placing additional demand on the same transport infrastructure has not been properly considered.

Accordingly, EFFRA considers that the application substantially overstates the sustainability credentials of the site. The proposed active travel improvements do not provide a continuous or genuinely attractive alternative to private car use, and the applicant has failed to demonstrate that the travel patterns assumed within the assessment reflect the realities of commuting from Effingham. In practice, most future residents are likely to remain reliant on private cars to access rail services, placing further pressure on local roads, station parking and the wider transport network.

IV. **In the case of major development involving the provision of housing, the development proposed complies with policy GB8. Viz The Golden Rules**

EFFRA believes it does not meet The Golden Rules in policy GB8 per below.

a. **Affordable housing**

The applicant is offering 50% of the housing to be affordable but the details are unclear. The location is unsuitable for this scale of affordable housing as the village has few local jobs and poor transport links. Government policy is clear that affordable housing should be located in urban areas with good infrastructure.

b. **Necessary improvements to local or national infrastructure**

This proposal fails to offer the necessary social and community infrastructure required in order for the community not to be overwhelmed by the development. The development will take up local school places but no improvements to schools are offered, unlike the previous scheme which involved the building of a new school. A new Nursery is included but is an insufficient contribution. No new recreational facilities are offered, unlike in the previous scheme where recreational facilities at the new school would be available to local residents and the KGV Hall would be rebuilt. The KGV Hall and playing fields are run by a local charity and will be unable to support an extra 1,000+ residents in the village. The offered improvement to the transport infrastructure is insufficient to offer any real improvement and the problem is that the constrained historic nature of the road system means that such an improvement would not be possible. Section 106 contributions will be insufficient to resolve these inadequacies.

c. **Provision of new green space or improvements to existing green space, which is accessible to the public**

Whilst green space which is accessible to the public is proposed on the development this rule is failed by the provision that it should support nature recovery. The wildlife in these fallow agricultural fields will be harmed by this development.

2. Other Reasons for Objection

I. Inappropriate scale, density and urban design

The application is for up to 600 dwellings on this 23.78 hectares of farmland with an approximate density of around 26 homes per hectare. This tight density is graphically illustrated in the Illustrative Master Plan on page 42 of the Design and Access Statement. This density is over 50% higher than neighbouring properties and is totally out of character for this rural village. Nearby dwellings are a

mixed stock of bungalows, chalet style houses and detached houses, most with large mature gardens containing hedges and trees, with their design matching the rural character of the village. These packed urban style dwellings on very small plots will be out of keeping with the village, particularly with their proposed heights. The Buildings Heights Parameter Plan shows building heights much taller than other buildings in the village. Most of the buildings are proposed to be at least of 2½ storeys with a maximum ridge height of 11.5 metres (equating to 3 storey houses as the roof will contain a third floor). Over a third are proposed to be 3 storeys with a maximum ridge height of 13.5 metres. Possibly a quarter of the buildings (mainly on Lower Road and on the south east and south west borders) are proposed to be two storeys and up to 9.5 metres in height.

EFFRA believes this is in conflict with Guildford Local Plan policies and the Effingham Neighbourhood Plan which forms part of it. Policy D4 sets out the character and design of new development and specifically requires new developments to "integrate well with the natural, built and historic environment", "respond meaningfully and sensitively to the site, its characteristics and constraints, and the street patterns, spaces around buildings, layout, grain, scale, massing, proportions, height and materials of surrounding buildings" and "ensure appropriate density to make the most efficient use of the land whilst responding to local character and context". Clearly this proposal does not match this requirement or the additional requirements for villages to "regard the distinctive settlement pattern and relationship between built form and surrounding landscape", "protect important views of the village from the surrounding landscape" and "protect views within the village of local landmarks". Similarly, the proposal is in conflict with Policy ENP-G2 of the Effingham Neighbourhood Plan and its 2016 Effingham Village Design Statement which requires new developments to be in harmony with existing heights, massing and density.

In an attempt to make the urban design acceptable the proposed design of the site is claimed to be sympathetic to Effingham's historic character. Instead, it is inappropriate and damaging because it is based on features which are not common to Effingham and downland villages, including the informal design (as the medieval layout of Effingham was formal), "tyes" and "village greens". Village greens are particularly atypical of Surrey downland villages as fertile soil was at a premium and used solely for agriculture.

No justification is given by the applicant for seeking to depart from the approved local plan policies for new developments. If approved, the result would be an inappropriate urban estate which would cause substantial harm to the character and open setting of Effingham. Whilst this is an outline application, there is no likelihood that any of these shortcomings will be properly addressed at the reserved matters stage based on the applicant's previous behaviour. Therefore, it should carry substantial adverse weight in considering the planning balance of this proposed development.

II. Impact on landscape and village Character

The proposed development would have a harmful effect on the landscape and village character of Effingham and be in conflict with local planning policies that seek to protect it as it would replace 23.78 hectares of countryside on the edge of the settlement by a residential urban style neighbourhood of up to 600 homes with associated roads, parking and infrastructure.

The Guildford Landscape Character Assessment and Guidance, Volume 1: Rural Assessment (GBC and Land Use Consultants, January 2007, p.60) forms part of the saved policies in the current Local Plan. It highlighted the dispersed rural settlement pattern within the historic field structure as important and advised against "expansion of settlement along roads (for instance northwards from Effingham)"

as this “would impair the rural, unified character of the area”. The Effingham Neighbourhood Plan policy G2 requires developments to respect the rural and landscape character and setting of Effingham in the Assessment, in particular by conserving the open countryside in and around the village area and key strategic views and vistas identified. The proposal does not conform with either of these or with Local Plan Policy D1.

In the previous applications for this site the Inspector was concerned that the proposals would not respect these policies and that it would harm the character and appearance of the area. However, the “very special circumstances” weighed effectively against this harm in the planning balance. This proposal has no “very special circumstances” and this harm should not be allowed.

III. Harm to Heritage Assets

EFFRA believes this development would cause substantial harm to the character and significance of designated heritage assets contrary to national and local planning policies.

Effingham Lodge Farm is unusually situated between two Conservation Areas – being adjacent to the Effingham Conservation Area and only 78 metres from the boundary of the Little Bookham Conservation Area. Both Conservation Areas contain a large number of nationally listed buildings and locally listed buildings with a Grade II* church in each Conservation Area. Within 1km of the farmland there are two Grade II* Listed Buildings (churches), 28 Grade II Listed Buildings, one Scheduled Monument, and the two Conservation Areas. In addition, there are 22 Locally Listed Buildings (non-designated heritage assets or “NDHAs”). This location is obviously extremely sensitive, and any development would need to be compliant with the NPPF guidelines on protecting, conserving and enhancing heritage assets. EFFRA believes it is not.

The land plays an important role in preserving the character and significance of the Effingham Conservation Area as it is an area of open land adjoining the historic village which helps to preserve its historic rural setting. It also provides an area of open land between Effingham and its neighbouring rural village of Little Bookham which also has a Conservation Area. Building a dense, high urban style development within view of these Conservation Areas with their rural village characters would adversely affect their character and significance and cause harm.

The applicant acknowledges that the applications site’s openness contributes to appreciating Effingham Conservation Area as an historic rural settlement, including the separation between Effingham and Little Bookham (Heritage Statement page 55 6.127) but concludes that harm would be minor. EFFRA contends that the harm would be more than minor but, in any case, any harm to heritage carries considerable weight in the planning balance and cannot be disregarded.

Furthermore, the proposal would negatively impact the setting of several nearby nationally and locally listed buildings, including Our Lady of Sorrows Church and its lych gate, the Grade II listed Red House and Lodge, and The Lodge. The applicant’s Heritage Statement seeks to minimise the significance of the nearest heritage assets, thereby underestimating the degree of harm the development would cause. This assessment of historic value is particularly flawed regarding two Grade II listed properties: the Red House is situated close to the site, and Our Lady of Sorrows Church is directly adjacent to it.

Harm to the Little Bookham Conservation Area is dismissed. But the site will be visible from it, particularly in the winter months when the vegetation dies back and the urban style development will be exposed. The Inspector in the 2017 Appeal was aware of this commenting on "*the sense of rural tranquility that defines the character of the setting to the Little Bookham Conservation Area" and the Grade II* listed church"*, but saying that the setting back of the school from the road with the open space in front would mean there was "*no clear inter-visibility*". In the current application, it is proposed that the development will be close to Lower Road in full view of the Little Bookham Conservation Area. This will obviously harm its character. The first Reserved Matters application for the existing school site was rejected both by the LPA and at Appeal because of the visibility of the proposed development to the Conservation Area.

The Heritage Statement also suggests the harm might be mitigated by the Reserved Matters application as it could ensure *"the developments sit harmoniously alongside the historic buildings of the Conservation Area"* (6.28). That is not possible! The Outline Application sets out a dense 600 dwelling development with parameter plans (Proposed Building Heights, Proposed Illustrative Landscape and Land Use Key Streets Space) and an illustrative masterplan in the Design and Access Statement which will constrain any changes to minor ones and will make little difference to the harm. Berkeley Homes' prior behaviour also suggests that it would be unlikely to compromise at a later stage to reduce harm to heritage assets

EFFRA believes the applicant's Heritage Statement is unbalanced, shows a poor understanding of the history of the site and contains factual errors. All of these shortcomings call into question the reliability of the assessment of the harm as minor. The Heritage Statement and the Planning Statement refer to the previous applications for this site but fail to include the Inspector's full assessment of the harm to the Effingham Conservation Area that would result. The very special circumstances which allowed acceptance of the original application do not apply to this application.

The Heritage Statement also shows a lack of understanding of the history of the site and of the character of Effingham as a downland village. For example, it states there is no known connection of the site with Little Bookham, whereas historical records clearly show the land belonged to the lord of the manor of Little Bookham until 1909 although the land was always situated in Effingham. Effingham's character is said to be "defined by an informal arrangement of streets, buildings and open spaces", whereas the historic village is based on a formal layout of narrow streets established during the medieval period which still survives and constrains traffic. (A fuller history of the site and assessment of heritage harm is given in Vivien White's comment by letter of 2nd November).

IV. Impact on road and transport infrastructure

EFFRA believes the proposed development of 600 dwellings on a site close to the centre of the small village would have a seriously harmful impact on road and traffic infrastructure in Effingham, which is already under pressure and would also adversely affect the surrounding area.

The Transport Assessment, prepared by Motion for Berkeley Homes, exaggerates the site's sustainability and underestimates the traffic impact of the development. Although the report repeatedly calls the location sustainable, its conclusions rely heavily on hoped-for behaviour changes, unbuilt infrastructure upgrades, and optimistic shifts toward use of public transport rather than how people actually travel today. Consequently, the assessment paints an unrealistic picture of future resident travel and minimizes the true strain the development will put on the local road network.

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The robustness of the Transport Assessment is also open to question given the timing of the baseline traffic surveys. The surveys were undertaken on Wednesday 8 July 2026, a date which the applicant presents as representative of typical conditions. However, this survey date fell approximately two weeks after the conclusion of both GCSE and A-Level examinations, when most children who had taken these exams at the Howard of Effingham School would no longer have been attending classes. Furthermore, published term dates clearly show that St Teresa's School, one of the local schools contributing to traffic movements within Effingham, had already ended its academic year on 4 July 2026, four days before the traffic surveys were undertaken. Whilst Manor House School remained open, the surveys were conducted during the final week of term, when attendance levels from children who had taken GCSEs would have been lower. As a result, car journeys on that day were likely to have been significantly lower than normal.

These factors are particularly important given that school-related traffic is widely recognised as a significant contributor to congestion on Lower Road and the surrounding highway network. The Transport Assessment provides no evidence that adjustments have been made to reflect the absence of exam-year pupils, nor does it demonstrate that traffic conditions recorded on 8 July 2026 were representative of peak school-period conditions experienced during the academic year. As a consequence, there is a material risk that the baseline traffic flows used to assess the impact of the proposed 600-dwelling development understate existing levels of congestion and therefore understate the true impact of the proposal on the local highway network.

V. Access Arrangements and Highway Safety

EFFRA has significant concerns regarding the proposed principal vehicular access from Lower Road. As shown on the submitted parameter plans, the main access to the development would be located directly opposite, or in very close proximity to, the principal entrance of Howard of Effingham School.

This location already experiences severe congestion during school drop-off and collection periods. Howard of Effingham School serves a wide catchment area extending beyond Effingham and, due to the limited parking provision available on the school site itself, parents, sixth-form students and visitors frequently rely on parking along Lower Road and neighbouring residential roads. As a result, traffic conditions along Lower Road are often characterised by significant queuing, vehicle maneuvering, on-street parking and high numbers of pedestrians crossing the highway immediately before and after the school day.

The proposed development would introduce up to 600 additional dwellings and a substantial increase in vehicle movements through a principal access positioned at one of the most heavily congested and sensitive points within the village. Residents entering and leaving the development would be required to interact directly with existing school-related traffic, creating additional delays and conflict points during peak periods. Local residents will recognise that current conditions are already challenging and that even modest increases in traffic can result in disproportionate levels of congestion and delay during term time.

Of particular concern is the highway safety risk arising from the concentration of vehicular and pedestrian movements in the immediate vicinity of the school entrance. At the start and end of the school day, substantial numbers of pupils walk, cycle and cross Lower Road to access the school, bus stops and surrounding residential areas. Introducing the principal access to a large residential development at this exact location would inevitably increase the number of turning movements

across pedestrian desire lines and increase the potential for conflict between vehicles and school children. This is especially concerning given that the development will itself generate additional family households and associated school-related traffic.

The application does not adequately demonstrate why the proposed access location represents the safest or most appropriate solution, nor does it convincingly address the cumulative effect of development traffic, school traffic, on-street parking and pedestrian activity during peak periods. In EFFRA's view, the proposal would intensify existing congestion and create an unacceptable highway safety risk at a location already subject to significant pressure during term time.

VI. Drainage and Flooding

EFFRA believes this site is unsuitable for this level of development because of the risk of groundwater and surface flooding which is likely to increase in a period of climate change. We believe the submissions by the applicant are inadequate as does the Surrey County Council SuDS team.

NPPF F7.1 requires:

'*Development proposals should not present a risk to potential occupiers, users, or visitors, and should not increase flood risk elsewhere*.' F7 2. Requires that *'where development is proposed in a location known to be at risk of any form of flooding, now or in the future, it should be refused unless:*
e. it can be demonstrated that flood risk will not be increased elsewhere.'
Guildford Local Plan Policy P4 2c) requires '…..without increasing flooding elsewhere, and where possible, will reduce flood risk overall.'

We do not believe this application meets these requirements.

The site is in EA flood zone 1 prone to both groundwater and surface water flooding. Parts of the site are classified as 'low, medium and high' risk. The applicant's submissions understate the flooding risk and the likely effect of building on the site which will reduce its capacity to absorb rainfall in a time of increased rainfall due to climate change. The SCC and GBC maps included in the reports such as VLLFA-PAA-GU-26-0183 - Land off Effingham Common Road show the current flood risk and surface water flows of the site, and we suggest that building on the site will increase the problem.

The site straddles chalk to the south and clay to the north which holds the water draining down from the chalk. It is subject to springs randomly breaking out across the Site at times of high rainfall which drain off the site and affect the surrounding areas. The site has an old local nickname of the "*Rainbow Fields*" as it has always been known for rainbows appearing when the springs activate. The applicant states that there is no history of flooding on the site, but it would be more correct to say there is no <u>record</u> of flooding on the site as it is agricultural land and the flooding has been managed as part of farming it. It is also not perhaps surprising that there are no historical records of buildings built on the northern clay part of the site (the archaeological investigations carried out as part of the previous applications also unusually found no evidence of settlement).

Lower Road along the south of the site marks a spring line which is unpredictable and can flood Lower Road and affect nearby properties in times of heavy rainfall such as the winter of 2013-14. The west of the site runs off on to Effingham Common Road, a major road through the village, and

regularly floods the road and ices it up in cold weather. The applicant has already had to deal with this on a number of occasions, but the problem remains and will be made worse by any development. Part of the site drains eastwards, regularly flooding FP76 from the junction with FP119A which runs along the side of the site. This then floods across Water Lane on to Preston Farm land. We do not believe the piped land drain which is not regularly maintained and subject to blockage will cope with increased flow. The water that will drain off this land after development is likely to be polluted. It is unacceptable for it to drain onto Preston Farm land which is to become a country park and into its ponds. Similarly, north of the site the Thornet Wood SNCI ancient and other woodlands would be affected by any polluted run off. Any development on this site should ensure that neighbouring properties and the woodland and green space around it are not taking surface or ground water from the site.

VII. Open Space

The applicant claims in its Open Space Assessment that the scheme would provide a surplus of open space over legal requirements. EFFRA believes however that the applicant has double counted space that is required under other regulations and that as a result there is actually a lack of open space for recreational use in the proposal.

Because of the sensitive nature of the site land is required to be set aside for ecological buffers to protect the ancient woodland, a wildlife corridor and Sustainable Drainage Systems (SuDS). This land will and should not be available for recreation as it will counteract its specific function. As a result, there is insufficient open space allocated for recreation and community use. This is of particular concern as the size of the development means that it will put pressure on the existing recreational facilities, public rights of way, and the surrounding countryside around Effingham.

The applicant proposes to push back the critical details covering landscaping, access, play facilities, management structures, and long-term maintenance to future Reserved Matters applications. This is unacceptable when the Open Space Assessment fails to demonstrate that the proposal would provide enough accessible, genuinely usable open space to meet the demands created by this proposed major development.

VIII. Impact on Education, Community and recreational infrastructure

EFFRA has significant concerns regarding the robustness of the Community and Educational Needs Assessment, particularly its conclusion that local educational infrastructure is capable of accommodating demand arising from a 600-dwelling development. EFFRA is also concerned about the effect on the community and recreational infrastructure of the village as there are no proposals for funding contributing to provide or upgrade community and recreational facilities.

Educational Infrastructure

The Assessment relies heavily on theoretical surplus school places and wider forecasts of declining pupil numbers, whilst failing to adequately consider actual school capacity constraints, year-group pressures, admission patterns and the practical realities of accommodating additional pupils within a small village community.

The Assessment itself forecasts that the proposed development will generate approximately 146 primary-age pupils and 58 secondary-age pupils. However, rather than demonstrating how these children could realistically be accommodated within local schools, the report largely relies on a snapshot of existing capacity data and broad county-wide projections of falling school rolls. This approach fails to recognise that the proposal represents a substantial concentration of new family housing in a highly localised catchment, where even modest increases in pupil numbers can have significant impacts on school capacity and associated infrastructure.

Particular concern arises from the baseline data used within the Assessment. For example, the report identifies Great Bookham School as having 259 pupils against a capacity of 330, resulting in a purported surplus of 71 places. However, current Department for Education records show the school accommodating 335 pupils against the same stated capacity of 330. This discrepancy calls into question the reliability of one of the Assessment's key assumptions regarding available primary school capacity and suggests that existing pressures will be materially greater than those presented by the applicant.

Whilst the Assessment also identifies spare capacity at St Lawrence Primary School, this also requires careful scrutiny. Department for Education data records a capacity of 210 pupils and a roll of 181 pupils (Berkeley Homes state the latter number, incorrectly, as 179). However, St Lawrence Primary School is a single-form entry primary school, meaning that spare places are unlikely to be evenly distributed across year groups. The existence of a small number of vacant places across the school as a whole does not necessarily mean that future demand arising from a large housing development can be accommodated without creating pressure within specific year groups. The Assessment fails to consider this practical constraint and instead assumes that all theoretical spare places are immediately available to absorb new demand.

The Assessment further overlooks the wider infrastructure implications associated with additional school-age children. In particular, St Lawrence Primary School has extremely limited on-site parking provision for parents and guardians. Existing drop-off and collection activity already places pressure on Orestan Lane, Lower Road and surrounding roads, with parents frequently relying on local highway space. The Assessment contains no meaningful consideration of the cumulative effects that additional school-related traffic and parking demand would have on an already constrained local road network.

The Assessment also assumes that spare places identified within schools located up to five miles away can be treated as readily available for future residents. This is an unrealistic assumption. School admissions are influenced by catchment areas, oversubscription criteria, parental preferences and transport accessibility. The existence of a theoretical place at a school several miles away does not mean that a child living in Effingham will be able to secure admission to that school in practice. Consequently, the Assessment overstates the flexibility of the local education system and understates the likelihood of additional pressure being placed on schools serving Effingham and the surrounding villages.

The Assessment relies heavily upon county-wide forecasts of declining pupil numbers to support its conclusion that sufficient educational capacity exists to accommodate the development. However, the current position at local schools appears considerably more constrained. Department for

Education data shows that primary schools are currently operating above its published capacity, whilst Howard of Effingham School is operating at approximately 97% of capacity. These facts do not indicate a school estate with substantial surplus capacity and call into question the Assessment's assumption that additional pupil demand generated by 600 dwellings can be accommodated without adverse effects on local educational provision.

The Assessment also fails to reflect the practical realities of travel between Effingham and neighbouring settlements, particularly during school drop-off and collection periods. Whilst the report assumes that pupils can readily access schools elsewhere within the local area, in practice the highway network is already subject to significant congestion at peak times. Residents regularly experience substantial delays on Lower Road and the routes connecting Effingham and Bookham during the morning and afternoon school runs, reflecting the concentration of local educational facilities including Howard of Effingham School, St Lawrence Primary School, St Teresa's School and Manor House School. Public transport options are limited, and for many families, there is no realistic alternative to travelling by car, particularly where younger children are involved or where school places are secured outside the immediate village. Consequently, the report's assumption that pupils can simply be accommodated within schools elsewhere in the surrounding area fails to account for the very real transport implications of those journeys and the additional pressure that would be placed on an already constrained local road network.

The Assessment considers the impact of the proposed development in isolation and does not appear to assess the cumulative effects arising from other committed and emerging residential developments in the wider Effingham and Bookham area. The assumption that spare capacity within nearby schools will remain available throughout the assessment period is therefore unsubstantiated. This omission is particularly significant given that the Assessment's conclusions rely heavily on surplus places at schools outside Effingham, including Great Bookham School and schools within the wider 2-mile and 5-mile catchment areas. A robust assessment should consider the cumulative impact of all significant residential developments expected to contribute to future demand for school places during the build-out period.

Taken together, these issues cast significant doubt on the Assessment's conclusion that the development can be accommodated without adverse impacts on local educational infrastructure. At a minimum, the evidence submitted by the applicant does not provide a sufficiently robust basis for concluding that a development of 600 dwellings would have a negligible impact on local schools, school-related traffic or associated community infrastructure.

Community and recreational infrastructure

As stated earlier, Effingham as a small village, is very reliant on the KGV Hall and Playing Fields run by the Effingham Village Recreational Trust (EVRT), a small local charity run by volunteers, for community use and recreation. This facility is also very heavily used by neighbouring Bookham residents. Effingham has no community or recreational facilities provided or funded by Guildford Borough Council or Surrey County Council and no sports clubs on their own land. The addition of 1,000 + new residents will overwhelm the KGV facilities, and the application contains no proposals for new recreational or community facilities on the site or for funding to improve the KGV facilities.

The previous approvals for this site given under “very special circumstances” included a new school with a large sports hall that would be open to the public after school hours and playing fields. It also included money for rebuilding the inadequate KGV hall. This permission covered 405 dwellings not the 600 in this application. Even if money was allocated through Section 106 it would be unlikely to be sufficient to provide adequate community and recreational infrastructure for a village that had increased by 60%, as the KGV would be overwhelmed by the increased use with car parking already a problem on the KGV. As the KGV is in the Conservation Area adding a large amount of additional car parking is not an option. Such necessary additions to community and recreational infrastructure need to be part of the application and land allocated to them on the applicant’s site including land for parking for users of the facilities.

IX. Impact on Wildlife and Ecology

This site is predominantly greenfield, containing only a minimal amount of hard standing remaining from previous agricultural and horticultural uses. Currently, the land consists largely of unmaintained grassland and scrub, with tree cover concentrated along the boundaries. To the north, the site borders Thornet Wood SNCI, an area of ancient woodland. To the east, it adjoins a designated wildlife corridor under Policy ENP-ENV2 of the Effingham Neighbourhood Plan (2016–2030).

Although the Applicant has engaged with the Surrey Wildlife Trust (SWT), their response to SWT’s concerns in the Environmental Statement (Chapter 13: Ecology, Table 13.1) is inadequate. When addressing the risk that all proposed habitat corridors could be severed in at least one location, the Applicant dismissively states that "the severance of wildlife corridors within the centre of the site is unavoidable when accommodating the number of units proposed."

The applicant is unable to meet the Biodiversity Net Gain targets and intends to purchase them off site. That is unsurprising as the land will be covered with development which will not only decimate the existing wildlife on it but also affect the areas around it. We are very concerned by the possible impact on Thornet Wood SNCI. The applicant is intending to install the legally required 15 m buffer zone, but the guidance specifically says this may need to be extended where the development changes the water table. It is clear that the water table will be affected by building on this wet site and we are concerned about the effect on the ancient woodland. If the development goes ahead the buffer zone should be extended. We are also concerned that the applicant originally intended to put a dog walking, cycle and walking route through the buffer zone. In the application documents this route has been moved to just beyond the edge of the buffer zone, but it is important that the buffer zone is planted as a semi-natural habitat to protect the woodland and that dogs and humans are excluded from it.

We are also concerned about the Eastern Wildlife Corridor. ENP-ENV2 requires a minimum width of 100m, and it is not clear from the Illustrative Landscape Proposal Drawing 18837_P12 whether this has been allowed for. There also appears to be a gravel path for walking and cycling running through it and possibly a play area. Such usage would need to be carefully considered so that it does not negatively impact on its effectiveness as a wildlife corridor.

We also note that the wildlife surveys carried out may not accurately reflect the whole situation as they were carried out in unusually dry weather, whilst this site is prone to surface water flooding.

X. Asbestos contamination

There has been work carried out on the fields shown in Google Earth images which is of particular concern as the company has confirmed that it has found evidence of asbestos in soil samples. Residents reported that in the years before the applicant bought the site, lorries had been seen entering the site at night and using diggers to bury quantities of material that were believed to contain asbestos. Since there is no certainty if any or how much of the site may be contaminated, we believe that proper investigations should be carried out before there is any further disturbance to the land. This is of particular concern with three schools and residential properties close to the site. A full survey of potential contamination should be undertaken prior to any planning consent being considered and cannot be left to planning conditions.

In summary, Effingham Residents Association (EFFRA) strongly objects to this outline planning application as inappropriate development in the Green Belt that conflicts with the National Planning Policy Framework (NPPF). We believe the scale of the development would cause substantial harm to the Green Belt, landscape and village character, heritage and wildlife and ecology and would have a severe negative impact on the risk of flooding, roads, transport and highway safety and education, community and recreational infrastructure in the local area. We are also concerned about the extent of asbestos contamination on the land.

EFFRA therefore strongly objects to this application and respectfully requests that the application be refused.

20th November 2026

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Appendix 1: Main Planning Applications and Decisions from Former Berkeley Homes Scheme

1. Original scheme approved of 405 enabling homes for new school

Planning application 14/P/02109 for 295 homes as enabling development with 20% affordable for a new 2,000 pupil Howard School and separate Cullum Centre for children on the autistic spectrum on their land at Effingham Lodge Farm submitted in October 2014; refused by Guildford Borough Council Planning Committee in March 2016 and approved at appeal on 21 March 2018 with strict conditions on timing, design and green space with S106 Agreement for community contribution including rebuild of KGV Hall. The 295 homes were distributed over three sites.

- a new building for the Howard of Effingham School, and playing fields, on Lodge Farm for 2000 pupils (an expansion of the existing school size of 1600 places)
- 159 homes adjacent to the new school on Lodge Farm
- 99 homes on the site of the existing school on Lower Road once the new school is complete
- 37 homes on Browns Field (between Browns Lane and The Street) once the new playing fields are in use

2. 110 further dwellings agreed on a Green Belt extension to the original site and 4 self build homes on existing site on basis that scheme with school build was not financially viable without it.

Planning application 21/P/01306 submitted on 10 June 2021 and refused on 5 April 2022 and agreed at appeal on 28 November 2022, enabled by 21/P/01283 which removed areas from the parameter plan including from the area agreed for the school, for a further 110 dwellings with 20% affordable on an additional piece of land at Effingham Lodge Farm to the original scheme and four self-build dwellings on grounds that the scheme was no longer financially viable.

3. School size reduced from 2,000 pupils to existing size of 1600 pupils, Cullum SEND Centre removed and school design specification lowered
Planning application 25/P/01128 submitted on 8 August 2025 in which Berkeley applied for a simplified school design for 1,600 pupils without a separate Cullum Centre – again on the grounds that the modified scheme was not financially viable. Not determined.

4. **Application to remove affordable housing requirement and double the number of new homes to be occupied in advance of practical completion and transfer of the new school** on grounds that modified scheme is not financially viable.
26/P/00146 submitted on 4 February 2026 not determined

In late March 2026 the company said that it would not build the new Howard of Effingham School and was "committed to bringing forward a viable scheme" for the site, before submitting this application in October 2026.