



East Horsley

Parish Council

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29th July 2021

GBC Planning Services,
Guildford Borough Council,
Millmead House,
Millmead,
Guildford GU2 4BB

Attention: Case officer, John Busher

RE: Application 21/P/01306 Land at Effingham Lodge Farm, Lower Road, Effingham

Hybrid planning application for outline planning permission (only access to be considered) for the erection of 4 self-build dwellings on land at 408-410 Lower Road, Effingham following demolition of all existing buildings; and full planning permission for the erection of 110 dwellings, with access, parking, community assets, landscaping, and associated works on land at Effingham Lodge Farm, Lower Road, Effingham.

Dear John,

I am writing on behalf of East Horsley Parish Council ('EHPC') to OBJECT to the planning application by Berkeley Homes (Southern) Ltd for the proposed development at Effingham Lodge Farm in Effingham as summarised above.

We believe this proposal represents inappropriate development in the Green Belt without sufficient justification in terms of the Very Special Circumstances ('VSC') as required under the NPPF, and therefore should be REFUSED by GBC. Our analysis supporting this opinion is set out below.

PLANNING BALANCE ANALYSIS

The test for demonstrating that the VSC condition is being met by a planning application is particularly high, requiring a significant excess of benefits arising from the proposed development over planning harm caused. Our analysis of the main elements of planning gain and harm arising from the proposed development are given as follows:

Planning Gain

The principal planning benefits are identified as follows:

a) Contribution to housing land supply:

In the 2018 appeal for the Howard of Effingham school development (14/P/02109), the appeal inspector gave “very substantial weight” to the provision of new housing land. However, at that time the GBC Local Plan had not been adopted and Guildford borough’s housing land supply was estimated to be just 2.1 years. The situation today is fundamentally different. The GBC Local Plan was adopted in 2019 and there is a clearly demonstrated 5-year housing supply across the borough. The proposed site is not allocated in the Local Plan and it is not needed for meeting either the housing needs of Guildford borough, nor the housing needs of the local area, where a series of other large-scale developments are now coming forward. As such, we believe that the weight given to housing benefit from this development should only be considered as “limited”.

b) Replacement school and Cullum Centre:

The 2018 appeal inspector attributed “very substantial weight” to the provision of a replacement school and associated Cullum Centre. This clearly remains the primary benefit arising from the Berkeley Homes offering. However, the present application is not identical to the original 2014 application (14/P/02109), since it relates only to an extension of the already approved development site and associated school replacement. According to Berkeley Homes, the application is being made because of recent increases in building costs impacting their profitability level from the original proposal – hence the need to materially increase the scale of ‘enabling housing’ through a 7.33 ha site extension to allow such dwellings to be constructed.

Effectively this application can be viewed as a commercial negotiation between Berkeley Homes and the Education Authority over the level of profitability resulting from this development. It may also be noted that in their latest financial viability statement Berkeley Homes indicate that even under their current very pessimistic assumption of costs and market prices the project still generates a gross profit of around £10 million. Margins in the UK construction industry are often volatile and fluctuations in costs and selling prices can occur frequently. Whilst raw material costs may have increased of late, so too have local selling prices. Ultimately, the only effective way in which the financial assumptions of Berkeley Homes can reliably be tested is through a competitive tendering process. Otherwise, the negotiation process will always be tilted in favour of the sole developer.

Whilst the benefits of securing a replacement school clearly remain important, there would appear to be various options available to the Education Authority in the event the site extension is not approved. These include a revision of the build specifications to reduce costs, a potential re-phasing of the build-out schedule or even opening up the project to a number of other contractors on a competitive tender basis, thereby ensuring greater transparency and perhaps greater price competitiveness. Accordingly, we consider delivery of the replacement school to represent a “substantial” benefit, which is a slight reduction from the 2018 appeal inspector due to the availability of such potential options.

c) Other benefits

The applicant has identified other further benefits arising from this development such as the provision of new SANG areas and benefits in highways improvements. However, we consider these to be essentially mitigation measures arising to address the consequences of this development, which would not normally be considered as planning gain.

Planning Harm

a) Green Belt harm

Harm to the openness of the Green Belt was identified by the 2018 appeal inspector as carrying “substantial weight”. We still believe this applies to the current application.

b) Character and appearance of the Effingham settlement

The additional 114 dwellings at this supplementary site will mean the total increase in population of Effingham parish arising from this whole project will be around 40%. This represents a huge population growth in a short period of time and is likely to fundamentally harm the character of this small Surrey village. We would therefore attribute a “substantial weighting” to the harm caused to local character as a result of this project.

c) Ecological impact

The re-designation of an existing woodland as a SANG cannot mitigate the severe ecological harm caused by an intensive housing development at a 7.33 ha green field location which encompasses important wildlife corridors. The overall harm to local ecology must be considered to have a moderate to substantial weighting in terms of planning harm.

d) Impact on local road network

The roads around the site, in particular Lower Farm Road, are often heavily congested during peak hours at the present time. A 40% increase in the population of Effingham parish cannot fail to exacerbate such congestion. Such highways impact is likely to be classed as “severe” within a planning context.

e) Impact on local social infrastructure

Other than the replacement school there is no meaningful provision for new social infrastructure in the area, either provided in connection with this development or from the GBC Local Plan. We would anticipate that new residents will draw upon a range of social infrastructure available in the adjacent larger settlements of Bookham and East Horsley. For instance, the site is just 1.5 miles from the parish of East Horsley, where much of the social infrastructure is currently operating at its capacity including the local Medical Centre, primary school and village centre parking. The railway station of Effingham Junction, part of East Horsley parish, was operating at full capacity during pre-Covid weekdays and is the nearest railway station to the site.

Without any provision of new social infrastructure either under the Local Plan or as part of the proposed development, we expect the harm caused to existing social infrastructure arising from this development to have a weighting of Moderate to Substantial.

Summary balance

The overall Planning Balance arising from this development is therefore estimated as follows:

GAIN:	<u>Attributed weight</u>
Contribution to housing land supply	Limited
Replacement school	Substantial
Other benefits	Neutral
HARM:	
Green Belt harm	Substantial
Character & appearance of Effingham	Substantial
Ecological Impact	Moderate/substantial
Impact on local road network	Severe
Impact on social infrastructure	Moderate/substantial

Based on our analysis, therefore we conclude there is a significant preponderance of planning harm over planning gain arising from the proposed development at Effingham Lodge Farm. Therefore, the conditions needed to satisfy VSC and thereby justify this Green Belt development are not met.

Accordingly, East Horsley Parish Council OBJECTS to this proposed Green Belt development at Effingham Lodge Farm and recommends that GBC should REFUSE this application.

Yours faithfully,

N.S.Clemens

Nicholas Clemens
Clerk & Responsible Financial Officer,
East Horsley Parish Council